



Department of Environmental Protection

Jeb Bush
Governor

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

November 9, 1999

N61331.AR.000679

NSWC PANAMA CITY

5090.3a

Mr. B.K. Moring
Code 1855
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: May 1999 - Quarterly LNAPL Measurement and Sampling Report,
SWMU 10, Coastal Systems Station, Panama City, Florida

Dear Mr. Moring:

I have completed the technical review of the above referenced document dated July 1999 (received August 11, 1999), prepared and submitted by Dames & Moore. The report adequately support discontinuing LNAPL measurements at PCY-363-MW-1 (MW-1). However, the information provided does not support the final close out of the site. I have the following comments that need to be resolved:

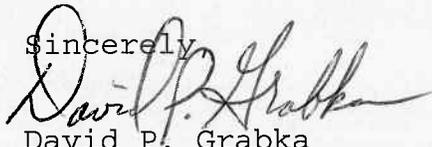
- (1) According to the approved Corrective Measures Study LNAPL Monitoring Plan flow diagram (attached), when quarterly sampling for LNAPL was to begin, monitoring wells PCY-363-4 (MW-4) and PCY-363-5 (MW-5D) were to be sampled and analyzed on a quarterly basis. I could find no reference to previous sampling events or analyses of MW-4 or MW-5D prior to this quarterly LNAPL sampling event. If there was a subsequent report (approved by the Department) to revise the decision process at the site, please refer to it in the report.
- (2) During the last sampling event, contaminants were not detected in the source well (MW-1) or downgradient wells (MW-4 and MW-5D) at concentrations exceeding Florida groundwater cleanup targets levels (GCTLs). Before the Department can give its concurrence that no further action is required for groundwater, two consecutive sampling events should demonstrate that GCTLs have been met. The second sampling and analysis event is confirmation of the previous event.
- (3) I cannot corroborate the decision to only analyze MW-5D for the 8 RCRA metals, and not VOCs and SVOCs, with what is

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written in the Corrective Measures Study. The document where this decision was made should be documented somewhere in the text. If the decision cannot be corroborated, MW-5D should be sampled and analyzed for VOCs and SVOCs.

If I can be of any further assistance with this matter, please contact me at (850) 488-3693.

Sincerely,



David P. Grabka
Remedial Project Manager

cc: Arturo McDonald, Naval CSS Panama City
Olga Perry, USEPA Region IV
Tom Lubozynski, FDEP Northwest District
James Spencer, Dames & Moore, Richmond, VA

TJB

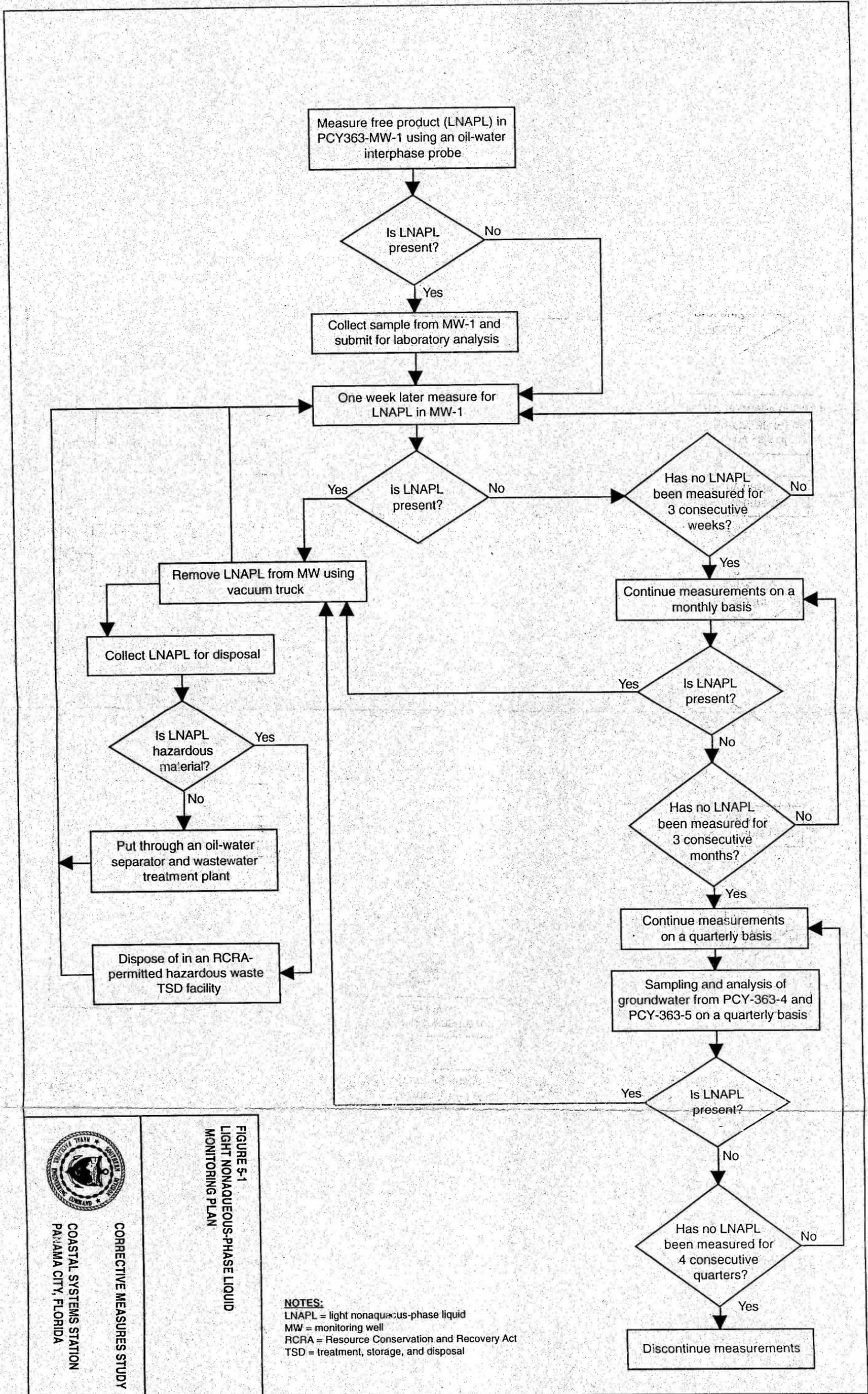


JJC



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CORRECTIVE MEASURES STUDY
 COASTAL SYSTEMS STATION
 PANAMA CITY, FLORIDA

FIGURE 5-1
 LIGHT NONAQUEOUS-PHASE LIQUID
 MONITORING PLAN

NOTES:
 LNAPL = light nonaqueous-phase liquid
 MW = monitoring well
 RCRA = Resource Conservation and Recovery Act
 TSD = treatment, storage, and disposal