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Florida Department of Enviro

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

July 26, 1991

Carol M. Browner, Secretary

N00204.AR.000251

NAS PENSACOLA

5090.3a

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Suzanne Sanborn
code 18211
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P. O. Box 10068
Charleston, South Carolina 29411-0068

Dear Ms. Sanborn:

Department personnel have completed the technical review of the following documents:

- 1) NAS Pensacola; CA/RA Investigation Sites 1, 2, 11, 12, 13, 14, 15, 24, 26, and 30.
- 2) NAS Pensacola; Diesel Fuel Marine Pipeline Leak, Intersection of East and North Avenues.
- 3) NAS Pensacola; CA/RA Investigation Work Plan - Group O Sites 32, 33 and 35.

I have enclosed memoranda for each report. They document our concerns on them.

If I can be of any further assistance with these matters, please contact me at 904/488-0190.

Sincerely,

Eric S. Nuzie
Federal Facilities Coordinator

ESN/sr

Enclosure

c: Bill Kellenberger
Allison Drew
Lynn Griffin
John Mitchell
*Ron Joyner





State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

To	_____	Journal	_____
To	_____	Location	_____
To	_____	Location	_____
From	_____	Date	_____

interoffice Memorandum

TO: Eric S. Nuzie, Federal Facilities Coordinator

THROUGH: Dr. James J. Crane P.G., Environmental Administrator
Technical Review Section *JJC*

FROM: Jorge R. Caspary, Environmental Specialist
Technical Review Section *JRC*

DATE: July 8, 1991

SUBJECT: NAS Pensacola; CA/RA Investigation Sites I, 2, 11, 12,
13, 14, 15, 24, 26, and 30.

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I have reviewed the above mentioned sites and offer the following generic and site specific comments for your consideration.

1. The documents do not mention that potable/irrigation water wells encountered during a NEESA survey or recently installed wells drawing from the Producing Zone of the Sand and Gravel Aquifer are being used at or near the vicinity of each of the sites reviewed below.
2. The consultant plots the total metals for soil and groundwater in the figures without providing specific figures for each metal, especially for the primary ones. As is the case of Figure 3-14, Site 1, for TW004 the figure indicates a total metal concentration of 1,669 ug/l, however, 700 ug/l corresponds to Zinc, a secondary drinking water standard. Therefore, we recommend that different parameters be plotted in different figures.
3. Total PAHs in sediments, soils, and groundwater are reported only as Benzo-a-pyrene. Were any other constituents, i.e. naphthalene, fluorene detected in the lab analysis? It is expected that the second phase of the assessment will report individual PAHs as opposed to total PAHs as Benzo-a-pyrene only.
4. Phenols are reported as Trichlorophenol. Once again, were any other chlorinated or natural phenols detected in the laboratory analysis? Likewise, it is expected that the second phase of the assessment will report individual phenols as

opposed to total Phenols as Trichlorophenol only.

5. Are the detection limits for the different constituents analyzed throughout these reports the lowest attainable? That is, are there assurances that even though constituents were not detected at stated detection limits (which in the case of VOCs for soils were 1000 ppb) they could be present still above DER standards for clean soil although below laboratory screening limits?
6. The presence of methylene chloride is prevalent throughout the analytical phase at almost all sites many times at concentrations exceeding the assigned detection limit. While said parameter is a common laboratory contaminant, no discussion is presented as to the possibility of methylene chloride existing as a constituent rather than a laboratory contaminant.
7. It is expected that the additional work proposed will be performed at full protocol and not use "screening phase" detection limits.

CA/RI Sanitary Landfill (Site 1)

1. On the proposed sediment sampling event and its locations, additional sediment chemical parameters should be analyzed for especially NE of the site. At a minimum, metals and TRPHs should be included in addition to BNAs given the fact that no sampling event has been conducted for the above mentioned constituents.

On the proposed soil sampling event and its locations, is there reason to suspect that the soil borings to be located outside the landfill boundary will only contain metals?. For instance, what is the rationale for analyzing the proposed soil boring below the groundwater table adjacent to TW022, TW028 and TW012 for metals only? Are there assurances that of all possible leachate constituents, only metals are migrating through the groundwater table into the soil in that part of the site? We recommend that the soil be analyzed for TCL parameters at these locations since the soil borings analysis for TW022, TW028, and TW012 was not provided.

3. For the groundwater data presented, please refer to generic comment No. 2

4. It would be advisable to further investigate the collapse feature in the southern part of the site due to the fact that they are usually associated with solution cavities which could act as a pathway for contaminant migration, i.e. leachate to the main producing zone of the aquifer. We recommend that subsurface geophysics be conducted to determine the horizontal/vertical extent of this collapse feature before the proposed intermediate and deep monitoring wells are installed in the nearby vicinity.
5. It is indicated that this site contains a Boy Scout camp and a recreational area; if so, are recreational fishing/oystering activities being conducted on any of the ponds and/or the Bayou Grande area that could cause unacceptable risks to camp and/or picnic attendants given the levels of TRPHs, PAHs and Phenols in the nearshore/pond sediments?

Waterfront Sediments (Site 2)

1. It would be prudent to include in this report the often mentioned FDER's Pensacola Bay sediment sampling data and its plot on a map. Moreover, no discussion is presented regarding the possibility that the parameter concentrations found at this site exceeded the reported FDER values.
2. Please refer to generic comments No. 1; 2, 3, 4, 5, and 6.

North Chevalier Disposal Area (Site 11)

1. Free product recovery should be implemented at the detected wells.
2. Please refer to generic comment No. 1, 2, 3, 4, 5, and 6.
3. Due to the apparent direction of groundwater and surface water flow, plus the amount of PAH's and Phenols found in the vicinity of the creek adjacent to the site, sediment and surface water should be sampled and analyzed for TRPHs, PAHs, and TCL metals in addition to the sampling proposed in the document.
4. The consultant proposes to conduct an "off-Site Contaminant Source Survey", however, additional details of the proposed survey are not provided. For instance, are any additional drilling or geophysics necessary to conduct such assessment?

Scrap Bins (Site 12)

1. On the proposed soil sampling, why are the samples north, south, and west of B002 only going to be analyzed for TCL BNAs? Are there any assurances that VOCs are absent from the soil in that or any sector of the site at concentrations below those stated in the lab analysis?
2. The soil boring north and south of B001 should also be analyzed for Phenols due to the concentrations found at B002.
3. Please refer to generic comments No. 1 through 6.
4. While the consultant indicates that a source of contamination may be Bldg. 455, no indication is provided as to the institutional controls being exercised that could prevent possible contaminant migration to the outside.

Magazine Point Rubble Disposal Area (Site 13)

1. Please refer to generic comments No. 1 through 6.
2. why does the proposed additional work plan does not include monitoring any of the wells that Geraghty and Miller installed as part of a separate study?
3. Any investigation near the vicinity of the previously encountered asbestos material should be carried out with care due to the fact that while asbestos tile is not readily friable, it can become so by any type of boring or disturbing activity that encounters said material.

Dredge Spoil Fill Area (Site 14)

1. Is there reason to believe that the proposed sediment sample northwest of B009 will only contain TRPHs when the sample 200 feet northwest and up the creek will be analyzed for TCL and other parameters?
2. In the case of B001A and others, please refer to generic comments No. 1 through 6.
3. On the work'proposed adjacent to B00 and B007, why is analysis for VOCs not being proposed?
4. For comparison purposes, we recommend that results of the FDER sampling event done on Pensacola Bay be provided.

Eric S. Nuzie
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5. Are pond, underdrain sand filters, or any institutional controls being used/practiced for filtering potential contaminants?

Pesticide Rinsate Disposal Area (Site 15)

1. Analysis for VOCs in soil should also be conducted North and West of B001 North of B003, West of B004, East of B013, North of B015, East of B016, and South of B017.
2. Please refer to generic comments No. 1 through 6.

DDT Mixing Area (Site 24)

1. The soil borings northeast, southwest of B001, southwest of B002, southeast of B008, north and northeast of B015, should be analyzed for VOCs.
2. The soil boring proposed southeast of B017 should also be analyzed for metals.
3. Due to the groundwater flow, a monitoring well East of TW017 should be installed and the groundwater analyzed for Metals and Pesticides.
4. Please refer to generic comments No. 1 through 6.

Supply Department Outside Storage (Site 26)

1. We recommend analyzing the soil borings around B004 for VOCs.
2. Are any pesticides stored in the Chemical Storage Shed and if so, the soil borings proposed behind, in front of, and south west of it should also be analyzed for pesticides.
3. Please refer to generic comments No. 1 through 6.

Buildings 649 and 755 (Site 30)

1. We recommend that the proposed soil borings around B001 be analyzed for VOCs.
2. Please refer to generic comments No. 1 through 6.