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Florida Department of Environ.

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Lawton Chiles, Governor

Carol M. Browner, Secretary

November 12, 1991

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NAS PENSACOLA

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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

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

Dear Ms. Sanborn:

Department personnel have completed the technical review of the Draft Contamination Assessment/Remedial Activities Investigation Work Plans, Groups H, I, L, P and Q, NAS Pensacola. I have enclosed a memorandum from Mr. Mark Canfield and Mr. Jorge Caspary to me. It documents our concerns on this matter.

If I can be of any further assistance, please contact me at (904)488-0190.

Sincerely,

Eric S. Nuzie
Federal Facilities Coordinator

ESN/dd

Enclosure

cc: Bill Kellenberger
Ron Joyner
Lynn Griffin
John Mitchell



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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Interoffice Memorandum

TO: Eric S. Nuzie, Federal Facilities Coordinator
Bureau of Waste Cleanup

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

FROM: Jorge R. Caspary, Technical Review Section *J.R.C.*
Bureau of Waste Cleanup

Mark A. Canfield, Technical Review Section
Bureau of Waste Cleanup

DATE: November 4, 1991

SUBJECT: Review of Draft Contamination Assessment/Remedial
Activities, Investigation Work Plans Groups H, I, L, P,
and Q. Pensacola Naval Air Station

We have reviewed the above referenced documents and offer the following comments for your consideration.

General Comments

It is indicated that these work plans are the result of information provided by the Navy as well as E & E preliminary site inspections conducted during January of 1989. The delay of over two years to propose locations for soil borings and temporary/permanent wells is unacceptable. It is our hope that subsequent work will move a lot faster through the review system.

For Phase I, the compositing of soils over a five foot interval is unacceptable. A less extensive interval is recommended.

Water generated during well purging and development at any phase should not be disposed back into the well.

As stated in previous memos and agreed upon during a subsequent project manager's meeting held on base, some of the less rigorous QA/QC methodologies intended for Phase I soil and groundwater assessment are unacceptable. The screening phase or Phase I should be the basal phase upon which all subsequent work is based, therefore, detection limits currently used by the Department should be strived for if the Navy and its subcontractors are to avoid any comments regarding this issue.

Eric S. Nuzie
November 4, 1991
Page Two

Concurrent with the above comment, and as agreed upon during the previous project manager's meeting, it is expected that, when reported, the designation of "total **as**" for various chemical parameters will be avoided both on the tables and figures.

Will any soil samples be collected below the groundwater table to assess the vertical extent of soil contamination due to possible "**sinker**" constituents?

In the past, E & E Buffalo Laboratory has had serious problems with methylene chloride levels detected during the screening phase chemical analyses. Said constituent and its elevated levels were purportedly a result of laboratory work. It is recommended that stricter QA/QC controls methods be used to avoid unnecessary comments regarding this issue.

Phase I sampling and analysis results should be current (less than six months old) when submitted to the Department for review.

Who will conduct the asbestos surveys, a field geologist and his crew? Please clarify.

Site specific Comments

Group I (Sites 17, 18, and 28)

Site 18 PCB Spill Area

pp. 14-8, Figure 14-2. Is there any reason as to why a tentative soil boring is not proposed at the upper right hand corner of the site?

Group H (Site 8 and 22)

Sites 8 Rifle Range Disposal Area

Site 22 Refueler Repair Shop

pp. 14-11, Figure 14-2. This figure does not clearly identify the boundaries of both sites. The shaded area is identified as "**the sampling area**" not the site. Does the "sampling area" reflect the areal extent of both sites? Please clarify.

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Eric S. Nuzie
November 4, 1991
Page Three

Group L (Sites 4, 5, 6, and 16)

Site 6 - Fort Redoubt Rubble Disposal Area

pp. 3-2, Asbestos may or may not have been buried on site. How much asbestos is estimated to have been buried on site, and are the estimated depths of burial and thickness of cover available?

Group P (Site 38)

Site 38 - Building 78

pp. 14-4 Sediment Sampling. It is indicated that each sediment sample will be composited, however, the composite interval is not indicated. Is the drainage system deep enough to warrant composite samples as opposed to grab samples? Also, please explain the methodology and tools to be used in obtaining a composite drain sample.

pp. 14-8 Please note, any tests done to determine aquifer hydraulic characteristics should use a minimum of three wells.

Group Q (Site 39)

Site 39 - Oak Grove Campground

pp 14-7, Figure 14-1. Is the areal extent of stained soils accurately depicted on Figure 14-1? How has it been determined? Has a land survey already taken place?

pp 14-6. Groundwater. It is indicated that the locations of the temporary monitoring wells "will be determined after the completion of the physical and geophysical survey", therefore, are the locations of the soil borings that will be converted into temporary monitoring wells also dependent on these two surveys or do they represent, as inferred in the previous section - Soils -, permanent and predetermined locations?

pp 14-11 Figure 14-2. The installation of a temporary/permanent shallow monitoring well in the center of the site is recommended to be accomplished during the screening phase as opposed to Phase 11.

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