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Florida Department of Environ

Twin Towers Office Bldg. o 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400
Lawton Chiles, Governor
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June 15, 1992

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NAS PENSACOLA
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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 Interim Data Reports (Phase I) and Proposed Contamination Assessment/Remedial Activities Investigation Work Plans (Phase 11), Groups F, G, J, K and N, NAS Pensacola. I have enclosed a memorandum addressed to me from Mr. Jorge Caspary. It documents our comments on these reports.

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

Sincerely,

Eric S. Nuzie

Eric S. Nuzie
Federal Facilities Coordinator

ESN/dd

Enclosure

cc: Bill Kellenberger
Ron Joyner
John Mitchell
Lynn Griffin
Allison Drew
Jorge Caspary

State *of* **Florida**
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

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

THROUGH: Dr. James J. Crane, PGIII/Administrator
Technical Review Section JJC

FROM: Jorge R. Caspary, P.G. Base Coordinator
Technical Review Section J.R.C.

DATE: June 5, 1992

SUBJECT: Review of Interim Data Reports (Phase I) and Proposed Contamination Assessment/Remedial Activities Investigation Work Plans (Phase 11). Groups F, G, J, K, and N. Pensacola Naval Air Station.

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The above referenced documents have been reviewed and I offer the following comments:

General Comments

1 - Previous responses have indicated that Phase II background samples will be taken around the inactive well fields. Is this still the case for all these sites?

2 - It is expected that at the contaminant levels found at various sites during the screening phase, a longer -48 to 72 hours- aquifer pump test will be required during Phase II to determine or design aquifer remedial action plans. With the extent of the work proposed in Phase II and by the conclusion of said phase, the majority of the horizontal and vertical extent of contamination in both media should have been defined. Remedial Action Plans or Feasibility Studies that will take care of the most contaminated areas should be designed and implemented while still pursuing any remaining plume delineation during Phase III.

Phase I - Site 9 - Navy Yard Disposal Area - Group F

1 - The work presented in Phase I -Interim Data Report- is acceptable for its purposes.

Phase II - Site 9 - Navy Yard Disposal Area - Group F

1 - The work proposed is acceptable for its purposes.

Phase I - Site 10 - Commodore's Pond - Group F

1 - pp. 3-7. Please indicate where the background reading was obtained for this site or is a background sampling program underway around the inactive well field?.

2 - pp. 3-33. The consultant and the Navy state that Site 23 is affecting Site 10. Due to the proximity of both sites and some areal overlap, it is suggested that they be considered a single site for assessment and/or remediation purposes.

Phase II - Site 10 - Commodore's Pond - Group F

1- The work proposed is satisfactory for its purposes.

Phase I - Site 23 - Group F

1- The work presented is satisfactory for its purposes.

Phase II - Site 23- Group F

1- pp. 14-42. The rationale for installing permanent well number 5 is acceptable, however, it is suggested that shallow, permanent monitoring wells be installed approximately 50 feet northwest and southeast of former temporary well TW 008 to determine the origin and to delineate the extent of free product in ground water.

2- In addition to the above mentioned well, a permanent intermediate well (Screen Interval from 20 to 30 feet below land surface) should be installed next to well number 5 to determine the vertical extent of phenols in the intermediate aquifer.

Phase I - Site 29 - Soil South of Building 3460 - Group F

1- The work presented is satisfactory for its purposes.

Phase II - Site 29 - Soil South of Building 3460 - Group F

1- pp. 14-28. A soil boring located east of SB-6 should be installed to define the lateral extent of Pyrenes found during Phase I.

Phase I - Site 24 - Solvent North of Bldg. 3557 - Group F

1- The work presented is acceptable for its purposes.

Phase II - Site 34 - Solvent North of Building 3557 - Group F

1- Please include with the work proposed a leak test of tanks and lines.

2- pp. 14-29. Additional soil borings are warranted in the unpaved area north of the tank, between B010 and B008 to confirm the absence of contamination.

Phase I - Site 27 - Radium Dial Shop Sewer- Group G

1- pp. 3-15. Table 3-3 presents data for Radium 226 in soil with a detection limit of 0.5 pCi/g. However, some of the data presented on the same table indicates levels that are below instrument detection limits. Please explain.

Phase II - Site 27 - Radium Dial Shop Sewer - Group G

1- pp. 14-1. How does the consultant or the Navy propose to learn more about the NEESA-RASO survey, and if that information is or was available why wasn't it presented during Phase I?

Phase I - Site 25 - Radium Spill Site- Group G

1- This comment goes back to the issue of detection limits, for instance, total PCBs in soil. The consultant's laboratory has used detection limits that are simply too high. At this site and others, the detection limits presented are in the order of 5000 ug/kg. Typically, in most laboratories using GC/ECD, EPA Method 8080, the Method Detection Limits are 10 to 20 ug/kg for a sample of 30 g. GC/ECD is a fairly common technique among better labs. Even if the laboratory is using the GC/MS technique, the detection limits are higher but definitely lower than the 5000 ug/kg presented here. Why were such high detection limits used?

2- pp. 3-28. Please show the exact location and areal extent of the radium spill. The arrows are too general.

Phase II - Site 25 - Radium Spill Site - Group G

1- Based on comment number 1 for Phase I, an additional soil boring is warranted at the former location of B009.

2- Additional soil borings and a shallow monitoring well around B016 are warranted to define the lateral extent of TRPHs in soil and to verify their presence/absence in ground water.

3- pp. 14-20. Figure 14-4. With the exception of well number 13 which should be located at 60 feet from well number 14, it is recommended that all wells be installed where they are pictured as opposed to locating some wells 50, 60, even 90 feet from their indicated locations. These distances seem excessive if the Navy is to confirm the absence of radium in ground water.

Phase **I - Site 3 - Crash Crew Training Area - Group J**

1- pp. 1-1 Why doesn't the boundary of the site include the southernmost stressed area ?

2- Concurrent with the above comment, why weren't surface emissions, magnetic and soil headspace surveys, etc. included around the "stressed area"?

3- pp. 2-13. It is indicated that Geraghty & Miller wells number 20 and 22 have sustained severe damage. Please expand.

4- pp. 3-32. Explain the presence of Zinc in the blanks.

Phase II - Site 3 Crash Crew Training Area - Group J

1- pp. 14-15. The proposed Interim Remedial Measure should be implemented as soon as possible to remove this continuous source of contamination. Provide a schedule of actions to be taken to accomplish this step.

2- Additional soil borings and shallow ground water monitoring wells should be installed around the southernmost stressed area to confirm the presence or absence of contamination, moreover, the boundary of the site should be expanded to include this feature.

Phase I - Site 7 - Fire Fighting School - Group K

1- The work presented is satisfactory for its purposes.

Phase II - Site 7 - Fire Fighting School - Group K

1- pp. **14-21.** The installation of a shallow monitoring well about **25** feet downgradient of TW008 is recommended. Monitoring wells 2 and 3 are lateral to the general ground water flow.

Phase I - Site 21 - Sludge at Fuel Tanks - Group K

1- The work presented is satisfactory for its purposes.

Phase II - Site 21 - Sludge at Fuel Tanks - Group K

1- pp. **14-18.** Adjacent to the proposed soil interim removal area, an expanded OVA analysis north, south, east and west of soil boring B024 should be carried out which could expand the area of the excessively contaminated soil.

2- Since the Interim Remedial Measure should be implemented as soon as possible, please provide a schedule of activities which will accomplish this objective.

Phase I - Site 36 - Industrial Waste Sewer - Group N

1- Is the sewer only used for industrial wastes or is it a combined sewer, that is, designed for both industrial sewage and storm water?.

2- Has any leakage test ever been conducted at this sewer or portions of it ? If so, what was the leakage rate?

3- Please show on a top view map the location of flow control devices i.e. weirs, spillway siphons, gates, valves and the joints of the sewer line. Said devices/ joints may have not been maintained or installed properly, thus, contributing to the contamination of some of the adjacent sites to the Sewer Line.

Phase II - Site 36 - Industrial Waste Sewer - Group N

1- The proposed sampling program seems excessive; a different approach should be undertaken at this site to account for the hit or miss results presented in Phase I. At this time, it seems that the sewer is exfiltrating contaminated wastes through poor joints or cracked pipes. It is suggested here that before Phase II is started, the Navy conduct a thorough investigation of the disposal practices of the various industrial processes that dispose of their products into this sewer. In addition to the above step, it would be wise to correlate highly contaminated spots with a leak test to determine if the sewer is truly exfiltrating contaminated sewage, thus, affecting adjacent sites. At this point in time, chasing contaminant plumes serves no purpose if a comprehensive waste management and disposal plan is not in place and if the sewer continues to leak.