

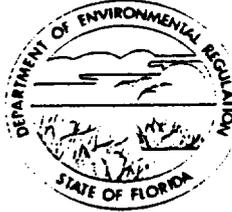
STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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TWIN TOWERS OFFICE BUILDING  
2800 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

N00204.AR.000478

NAS PENSACOLA

December 17, 1982 5090.3a

Commanding Officer  
ATTENTION: Code 114A1  
Southern Division  
Naval Facilities Engineering Command  
Post Office Box 10068  
Charleston, South Carolina 29411

Re: Navy Public Works Center, Pensacola NAS FL9170024567,  
Groundwater Monitoring Program

Dear Mr. Chacey:

We have reviewed the groundwater monitoring information submitted for the hazardous waste surface impoundment located at Pensacola NAS. After discussing our concerns with Messrs. Tom O'Donnell and Tom Missimer, of Missimer and Associates, Inc., it was concluded that to fully comply with 40 CFR 265 Subpart F, as referenced by Part III of Chapter 17-30 Florida Administrative Code, the following items should be attended to.

1. The location and arrangement of the existing downgradient wells are not suitable to ensure the immediate detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the surge pond. Two additional wells should be installed at the northeast and southeast corners at the boundary of the impoundment. We feel that these two new wells in conjunction with the existing well at the northwest corner (designated DG-1) will be better able to immediately detect any leaching of hazardous waste or hazardous waste constituents. An additional alternate downgradient well, located at the southwest corner of the impoundment, has also been proposed but is not required at this time.
2. Site specific hydrogeologic information for the uppermost aquifer including groundwater elevations, transmissivity and hydraulic gradient(s), well drillers logs, and field procedures (such as, sampling methods, equipment cleaning, and chain-of-custody) should be submitted.

The above items must be completed prior to the first scheduled semiannual sampling date in 1983.

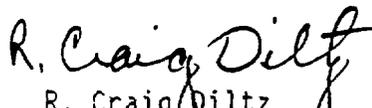
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The following items were also discussed with the representatives from Missimer and Associates, Inc. :

1. Since the location of the hazardous waste impoundment with respect to groundwater mound and the peculiarity of the groundwater gradients (resulting from surface drainage and tidal effects) precludes the placement of an effective upgradient well, we agreed that an alternative location is appropriate in this instance. We also agree that the background well (designated UG-1) and its continued monitoring according to 40 CFR 265.92 will provide data representative of the true background groundwater quality in this area.
2. We feel that the initial background concentrations or values established in accordance with 40 CFR 265.92(c)(1) and (2) will not have to be repeated for the two new downgradient wells. The data from the first year's monitoring of the existing wells represents the quality of groundwater which is less likely to have been impacted by contaminants from the surge pond. Therefore, virtually any alteration of groundwater quality detected during future sampling at the new wells would be statistically significant and would trigger the assessment strategy of 40 CFR 265.93. Continued sampling of the two existing downgradient wells, DG-2 and DG-3, will not be required. However, these wells may have potential for future use should the groundwater assessment program be implemented.

I hope this letter has adequately addressed all of the issues under contention. If you or your consultant have any more questions, please contact me at 904/488-0300.

Sincerely



R. Craig Diltz  
Solid & Hazardous Waste Section

RCD/CB/s

cc: Don Hunter, EPA  
Tom Moody, Pensacola DER  
Tom O'Donnell, Missimer & Associates