Lawton Chiles
Governor

Florida Department of Environmental Protec___

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August 20, 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda Martin
Department of the Navy
Southern Division - Code 1851
Naval Facilities Engineering Command
Post Office Box 10068
Charleston, South Carolina 29411-0068

Dear Ms. Martin:

Department personnel have completed the technical review of the Draft Remedial Investigation Report (RI) for Operable Unit 10, Pensacola Naval Air Station. I have enclosed a memorandum addressed to me from Mr. Jorge R. Caspary. It documents our comments on the referenced report.

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

Sincerely,

for

Eric S. Nuzie
Federal Facilities Coordinator

ESN/bb

Enclosure

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

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Florida Department of

Memorandum **Environmental Protection**

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

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

FROM: Jorge R. Caspary, PG I/Base Coordinator JRC.
Technical Review **Section**

DATE: August **13, 1993**

SUBJECT: Review of Draft Remedial. Investigation Report (RI) for OU-10 (Sites **13, 32,33,** and **35).** Pensacola Naval Air Station.

I have reviewed the subject document and submit these comments for the Air Force's consideration.

GENERAL COMMENTS - RI REPORT

The Department agrees with the conclusions for Sites 32, **33** and **35** and expects that the next version of the Document will have filled the data gaps needed to implement the Feasibility Study and subsequent Proposed Remediation Plan.

The proposed course of action for Site **13** is acceptable. The data available to date has proven that large portions of Site 13 do not need to be further assessed; furthermore, the areas of Site 13 that could have been impacted by disposal activities seem to have been addressed on a subsequent sampling episode and the Department will await the results of such to pursue a tripartite No Further Action agreement.

No explanation is given in the conclusion section of the report for the apparent discrepancy between the soil gas values obtained for Sites **32, 33,** and **35** and the groundwater data. Could this indicate improper groundwater sampling techniques? or improper soil gas QA/QC protocols?

Please include page numbers on tables and figures.

SITE SPECIFIC COMMENTS

Figure **2-4** and Page **2-23.** Please include in the text a discussion on the degree of completion of the Contamination Assessment Report (CAR) for the waste oil spill at the Bilge Water Treatment Plant and how does it relate to the **CERCLA** effort. Also, show on appropriate figures the location of soil borings and temporary/permanent monitoring wells installed **as** part of the aforementioned CAR. Is the assessment at this location being conducted under a Departmental Consent Order? or a regular NAS Petroleum contract? Will Groundwater Technologies (the **NAS** consultant) or EnSafe/Allen Hoshall (SouthDiv's Navy **CLEAN** contractor) fill the data gaps at this location?.

Page **3-6.** Please provide an accurate depth to groundwater. Refer to page 3-3 and clarify this discrepancy.

Page **4-6** Please provide the location of the Drainage Swale and the North-South Drainage Ditch on all figures.

?age **5-20.** Why was a "One Way" PVC pump used? Since it could cause excessive agitation of the water column in the well while sampling, the VOC and inorganic data presented for groundwater might be suspect; it seems that a peristaltic low-flow pump could have been a much better instrument used for purging and sampling monitoring wells. It is expected that the upcoming monitoring well resampling event will correct this deficiency by using a SAP approved instrument.

Page **5-40.** Please explain why the specific capacity of the shallow and intermediate monitoring wells was calculated while they were being developed. The specific capacity of a well should be computed after the fine sediments have been removed from the well bore and well screens via well development.

Page **5-42.** The results of the aquifer tests and subsequent aquifer parameters have proven inconclusive due to the short amount of time the pump test was underway **(6** hrs.). This **is** further proof of the long-standing Departmental position that a 72 hour pump test must be implemented.

The amount of well drawdown per pumpage time (0.04 to 0.15 feet) is insufficient to design an effective recovery system. Will this be the range of values used in the Draft FS and subsequent Proposed Plan? Please indicate the amount of time that the wells were pumped prior to the time the discrete drawdown measurements were made.

Does the Navy plan to calculate vertical conductivity (Kv) of the surficial and intermediate aquifer before the implementation of the Final FS? This is an important parameter needed in any pump and treat system.

Page 6-29. Please use unconfined aquifer methodology to calculate surficial non-confined aquifer parameters as is the case at NAS Pensacola. Correct the next and figures as needed.

BASELINE RISK ASSESSMENT

Page **10-3** Tables **10-1** and 10-2. Please explain the configuration of these tables. How was a **95%** UCL obtained for **1,2,4-** Trichlorobenzene if only one hit out of **100** samples **is** reported in the table? It seems that the maximum concentration should have been used. In order to avoid confusion to persons that might be interested in reading these documents but lack enough technical and/or statistical expertise; i.e., some TRC Members, all tables should be adequately explained in the text.

Have non-detection values been used in the sample population and subsequent calculation of the UCL?

Page 10-11. The Department questions the Navy's opinion that Operable Unit 10 does not provide suitable locations to determine site-specific background conditions. Due to the size of Site **13**, there are areas that have not been impacted by any disposal activity or have not had the soils reworked; therefore, Site **13** could be used to determine background conditions. It is expected that background conditions will be established by the time the supplemental sampling results are provided to the Department.

BASELINE RISK ASSESSMENT - CONT'D

Page 10-17. It seems that the Navy has unilaterally decided on an industrial scenario to determine soil and groundwater Remedial Cleanup Goals. This is unacceptable. Although highly unlikely at this Operable Unit, the Exposure Assessment must include a future residential scenario unless the Navy has a deed restriction on this area recorded with Escambia County. Furthermore, the determination of Remedial Cleanup Goals at Operable Unit 10 to actual Industrial or potential Residential levels has to be done by a consensus of all three parties to the FFA. Please see FFA Section VIII (F) Consultation with U.S. EPA and FDEP (nee FDER).

Sediment values should also be compared to the Florida Sediment Criteria, that unlike NOAA's, which have been defined for sediments present throughout the country, are more applicable to Florida's sedimentary facies which are unique.

Table 10-15 should only indicate Soil Remediation Goals (SRGs) as compared to current Federal and State SRGs. All the other information should go in another Table.

APPENDICES K,N, O, and P

Please provide an explanation of the J qualifier at the end of each appendix and indicate so at the end of each table.