



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

September 1, 1993

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NAS PENSACOLA
5090.3a

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda Martin
Department of the Navy
Southern Division - Code 1851
Naval Facilities Engineering Command
Post Office Box 190010
Charleston, South Carolina 29419-9010

Dear Ms. Martin:

Department personnel have completed the technical review of the Response to Sampling and Analysis Plan Addendums, Sites 30 and 38, NAS Pensacola. 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,

Eric S. Nuzie
Federal Facilities Coordinator

ESN/bb

Enclosure

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

Memorandum

Florida Department of
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 *J.R.C.*
Technical Review Section

DATE: August 30, 1993

SUBJECT: Response to Sampling and Analysis Plan (SAP) Addendums
for Sites 30 and 38. Pensacola Naval Air Station

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

GENERAL COMMENT

The proposed course of action presented by the Navy is similar in scope to the one presented in 1992. At that time the Department suggested a more cost effective and time efficient plan. The main concern of the Department then and now resides in the fact that more effective tools designed to assess whether the industrial sewer line is leaking are readily available at the Navy's disposal. A tool discussed with the former and actual Navy RPM is the Video and Smoke Test for Exfiltration. In fact, the text of this document indicates that such tests have already been conducted at this site; however, the development of this SAP Addendum does not take into account the results of the test to formulate an assessment approach; rather, it indicates that "the results of the tests will be provided to E/A/A&H by the Navy; if possible, to target possible areas for investigation". This step should have been accomplished long before the Navy presented this Document for concurrence; and as it stands, the proposed course of action and assessment work at these two sites will probably incur unnecessary costs as well as additional time. Due to recent events affecting NADEP Pensacola, an alternate proposed course of action follows.

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Eric S. Nuzie
August 30, 1993
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As result of Base Realignment And Closure (BRAC) III legislation, NADEP Pensacola will drastically reduce its industrial activities and the Navy has indicated that the sewer line will cease operations and be removed as part of the station's realignment. Unless the postponement of the work would result in funding problems or further contamination, the Department suggests:

- 1) the results of the smoke and video exfiltration tests, which should indicate the likelihood of areas of the sewer line needing a more focused assessment, i.e., soil borings and monitoring wells, be used to assess both sites, and
- 2) the assessment is coordinated with the actual removal of both, the gravity and force lines. The Department believes that this is a more cost-efficient and timely means of assessing this unique feature and suggests that the Navy, EPA, and FEDP Remedial Project Managers include this proposal as part of the Site Management Plan meeting tentatively scheduled for late September.