



Lawton Chiles
Governor

Florida Department of Environmental Protection

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Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 29, 1994

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NAS PENSACOLA
5090.3a

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Bill Hill
Code 1851
Southern Division
NAVFACENGCOM
P.O. Box 190010
2155 Eagle Drive
North Charleston, SC 29419-9010

Dear Mr. Hill:

Department personnel have completed the technical review of the Draft Final Sampling and Analysis Plans, Sites 3, 9, 10, 14, 29, and 34, **NAS** Pensacola. I have enclosed a memorandum addressed to me from Mr. David M. Clowes. 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/st

Enclosure

cc: David Clowes
Satish Kastury
John Mitchell
Bill Kellenberger
Ron Joyner
Allison Drew

Florida Department of
Environmental Protection

Memorandum

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

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

Tim J. Bahr, Professional Geologist II
Technical Review Section **B**

FROM: David M. Clowes, Remedial Project Manager *DME*
Technical Review Section

DATE: March 29, 1994

SUBJECT: Draft Final Sampling and Analysis Plans (SAPs) for
Sites 3, 9, 10, 14, 29, and 34, Naval Air Station
Pensacola.

I have reviewed the above referenced documents dated February 1994 (received February 28, 1994) submitted for these sites. These site specific Sampling and Analysis Plans (SAPs) describe three phases (Phase I, II and 111) of field work.

The priorities of NAS Pensacola have changed in the last few months, with BRAC becoming the Navy's number one priority. Due to this priority change, the Navy requested the Draft SAPs for Category Five (Sites 3, 9, 10, 29 and 34) to be finalized as soon as possible in order to meet the BRAC schedule. To meet this objective the Tier I Pensacola IR team agreed during the January 21, 1994 meeting to verbally decide upon a general sampling strategy and specific sampling locations. The SAPs for these sites include the results of this meeting. Since the meeting date and before finalization of these Draft Final SAPs, Phase I field work has been completed. The results are to be submitted soon.

Temporary wells are proposed for Phase I and II field work and confirmatory permanent wells for Phase 111. The temporary wells are to be constructed, developed and sampled in accordance with the standard protocol for permanent wells, except lacking a bentonite seal and cement grout. Temporary wells are proposed instead of permanent wells under the Navy's/Contractor's assumption of cost and time savings.

FDEP agreed to the Navy's request to install temporary wells (followed by post-construction permanent wells if possible) at Category V sites affected by BRAC construction because permanent wells could be damaged. All temporary wells should be properly closed after one sampling event, to prevent them serving as

MEMORANDUM

ADDRESSEE

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conduits for surface water runoff, contaminating the groundwater and creating false positive groundwater sampling results.

However, at sites not impacted by BRAC, temporary wells (as described above) are not recommended for the following reasons. If permanent wells are needed to confirm the extent of contamination and for risk assessment, then the cost and time to install temporary wells in addition to confirmatory permanent wells will be greater, not lesser than solely installing permanent wells. **Also**, installing temporary wells at every soil sampling location instead of just installing a minimum of one permanent monitor well at the highest contaminated soil sample will also contribute to higher assessment time and costs. **There could be a potential costs savings if "direct push technique" groundwater sampling (followed by confirmatory permanent wells) for plume delineation were utilized.**

In summary, these documents appear to be acceptable in describing the specific sampling techniques for the assessment of Category V sites. However, for non-BRAC sites where contamination is suspected, it is recommended that permanent wells be installed instead of temporary wells (and confirmatory permanent wells) in order to save time, money and the risk of exasperating groundwater contamination.