



Lawton Chiles
Governor

Department of Environmental Protection

32501.039
09.01.39.0015

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

Virginia B. Wetherell
Secretary

N00204.AR.000733

NAS PENSACOLA

5090.3a

June 14, 1994

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
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 Immediate Removal Action Plan, Site 39, NAS Pensacola. I have enclosed a memorandum addressed to me from Mr. David M. Clowes. The concerns detailed in Mr. Clowes' memorandum need to be adequately addressed before we can consider approval of the referenced document.

If I can be of any further assistance with this matter, please contact me at 904/488-3935.

Sincerely,

Eric S. Nuzie
Federal Facilities Coordinator

ESN/st

Enclosure

cc: David Clowes
John Mitchell
Tom Moody
Ron Joyner
Allison Drew
Satish Kastury

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Memorandum

Florida Department of Environmental Protection

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

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

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

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

DATE: June 13, 1994

SUBJECT: Draft Immediate Removal Action Work Plan, Site 39,
Naval Air Station Pensacola.

I have reviewed the above stated document dated March 3, 1994 (received March 4, 1994) submitted for this site. The following three comments should be addressed:

1. Abandonment of the shallow monitoring well from the center of the area of soil removal should be conducted according to Rule 17-532.440, F.A.C.
2. During the Remedial Investigation, the monitoring wells need to be resampled due to high levels of turbidity. It is recommended that the wells be sampled using Quiescent Sampling (low flow purging using a peristaltic pump with a flow rate of about one liter per minute and waiting up to a maximum of six hours to sample at a low flow rate using a peristaltic pump). Turbidity measurements (using a turbidity meter) should be taken in conjunction with the metals sampling.
3. Surface soils are considered by FDEP to be from 0 to 2 feet below land surface. While it is acceptable to sample soils from 0 to 1 foot for Risk Assessment to be consistent with EPA; all remediation for surface soils should be from 0 to 2 feet unless soil contamination is limited to the upper one foot'. As per conversation with Henry Beiro (June 13, 1994) soil removal will not solely remove just one foot of soil, but to the full extent of stained soil or until the shallow groundwater (approximately 3 feet bls) interferes with further removal.