



Lawton Chiles  
Governor

# Department of Environmental Protection

32501.032  
09.01.32.0021

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2600 Blair Stone Road  
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Virginia B. Wetherell  
Secretary

N00204.AR.000734

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 32, Wetland No. 80, 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 approve 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

Florida Department of  
**Environmental Protection**

**Memorandum**

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

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

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

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

DATE: June 13, 1994

SUBJECT: Draft Immediate Removal Action Work Plan, Site 32,  
Wetland No. 80, Abandoned Wastewater Treatment Plant,  
Naval Air Station Pensacola.

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I have reviewed the above stated document dated March 2, 1994 (received March 3, 1994) submitted for this site. The overall workplan is acceptable with the following two comments:

1. If the purpose of the sampling for waste characterization during the pre-removal stage is to determine whether the sludge is nonhazardous (below TCLP levels), then one composite sludge sample from each of the three containers is not considered adequate. Discrete (non-composite) samples are recommended to prevent dilution of chemicals at "hot spots". Specifically, discrete samples should be collected at the four corners of the Imhoff Tank, at the four corners and the middle of the Sludge Beds, and at the area of highest possible contamination in the Chlorine Contact Chamber.
2. The sludge in the three containers is only approximately six inches to one foot thick (conversation with Henry Biero, June 13, 1994), thus it is acceptable only to sample the surface. However, if the sludge is thicker, then additional samples at depth are warranted.