

Department of Environmental Protect

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NAS PENSACOLA

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November 1, 1994

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Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010 Southern Division
North Charleston, South Carolina 29419-9010

RE: Draft Sampling and Analysis Plans (SAPs) for Sites 12
and 26, Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the above stated documents dated May 1994 (received May 4, 1994). The following comments should be addressed before these documents can be considered final:

General Comments (comments that pertain to both sites):

1. Sections 4.3 (Sample Location and Rationale) does not include the rationale for the number and location of samples. Normally, this information is provided in workplans; however, the Workplan (E & E, 1992) proposes different locations and numbers of samples than proposed in this SAP.
2. The Preliminary Remediation Goals (PRGs) should include the soil Cleanup Goals (CGs) listed in FDEP Memo dated July 5, 1994, as well as other applicable or relevant and appropriate requirements (ARARs). The CGs only address soils, so ARARs for other media, such as the Florida Water Quality Standards (Chapters 17-520 and 17-550, Florida Administrative Code), should also be considered PRGs.
3. The Contract Lab Protocol (CLP) should be adjusted so that the quantitation limits used for groundwater sample analysis are equal to or below Florida Primary, Secondary and "free from" Water Quality Standards (Chapters 17-520 and 17-550, F.A.C.).
4. To expedite document review, I recommend that soil and groundwater contamination above Federal and State standards/guidelines be graphically represented as well as

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documented in the text. Separate figures for soil and groundwater *are* preferable to composite figures. If a certain contaminant is widespread, then an additional figure, with contours illustrating concentration levels, would be useful. Proposed soil and groundwater sample locations should be plotted together on another figure.

Specific Comments:

Site 12 (scrap Bins):

1. The Phase I assessment has already been completed by E & E (1991). Therefore, why will Ensafe repeat the Phase I assessment and submit a Preliminary Site Characterization Report? Was the E & E assessment not considered valid?
2. With metals, TRPHs, VOCs, PAHs, PCBs, phenols and radiation in either soil, sediments *or* groundwater (Phase I study, E & E, 1991), a more thorough record search should be conducted to determine the activities that would be associated with the release of these chemicals in order to focus the assessment/remediation. Apparently, more than just "wet garbage" was disposed at this site.
3. E & E (1992) recommended that this site be upgraded in status from screening to RI/FS status, based on the levels and/or extent of contamination. So, why is this site still listed in the 1995 Site Management Plan as a screening site?
4. Figure 4-1 should include the location for the proposed surface water sample. If the sample is to be collected distal from the area illustrated by the figure, then this should be denoted.
5. If the two proposed sediment samples, at the upstream and downstream extensions of the onsite storm drainage system, are located off the area illustrated by Figure 4-1, the figure should still indicate that they will be collected, but at locations distal from the area illustrated by the figure.

Site 26 (Supply Department Outside Storage):

1. The identification of metals, PAH and TRPH in soil and metals and 1,1,1-trichloroethane in the groundwater during the E & E (1991) study should be included in the site history.

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2. If groundwater flow is to the **east**, then the locations for the proposed monitoring wells are acceptable; however, if groundwater flow is in another direction, then **additional** monitoring wells will be necessary to delineate the **extent** of shallow groundwater contamination.

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

Sincerely,



David M. Clowes
Remedial Project Manager

/dmc

cc: Ron Joyner, NAS Pensacola
Allison Humphris, EPA Region IV
Brian Caldwell, Ensafe, Pensacola
Tom Moody, FDEP Northwest District
John Mitchell, FDEP Natural Resource Trustee

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