



EnSafe / Allen

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November 29, 1994

Mr. David Clowes
Florida Department of Environmental Protection (FDEP)
Twin Towers Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Comment Responses on the Final Sampling and Analysis Plans (SAPs) for Category 5 Sites, Naval Air Station Pensacola

Dear Mr. Clowes:

EnSafe/Allen and Hoshall, on behalf of the Navy, is pleased to submit responses to FDEP comments for the above-referenced documents. Specifically, these comments were provided to the Navy on November 2, 1994, following submittal of Eratta for the final SAPs.

COMMENT:

1. 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.

RESPONSE:

The PRGs will include the most recent cleanup goals provided by the FDEP. Additionally, the Florida Water Quality Standards will also be considered PRGs.

COMMENT:

2. 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.).

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RESPONSE:

As agreed to by the Tier 1 Team, Phase I analyses will be conducted according to CLP protocol, and Phase II and III analyses will be conducted using CLP protocol and special analytical services, as required. In accordance with this decision, CLP protocol *can* be modified to register detection limits that will be equal to the Florida Water Quality standards, barring any necessity for dilution of the samples.

COMMENT:

3. To expedite document review, I recommend that soil and groundwater contamination above Federal and State standards/guidelines be graphically represented as well as 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 concentrations levels, would be useful. Proposed soil and groundwater sample locations should be plotted together on another figure.

RESPONSE:

The recommended format is acceptable to the Navy.

Should you have any questions or comments concerning these comment responses, please do not hesitate to call Mr. Bill Hill at (803)743-0360, or me at (904)479-4595.

Respectfully,



Brian E. Caldwell, PG

cc: Bill Hill/Bill Gates, SOUTHNAVFACENGCOM
Allison Humphris, USEPA
Ron Joyner, NASP
EnSafe/Allen & Hoshall file
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