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Virginia B. Wetherell
Secretary

January 6, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: Remedial Work Plan for Chevalier Field, Task 1, Site
2662W and Task 2, PSC 36, Category VIII, Building 3380,
Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject document, dated September 26, 1994 (received October 13, 1994). This workplan documents the procedures for the removal and thermal remediation of contaminated soil at Chevalier Field, Petroleum Site 2662W and IR Site 36, Building 3380, in preparation for BRAC construction. Groundwater contamination was not addressed in this document, so comments regarding further groundwater delineation will not be addressed here.

Completing the review of this document was delayed awaiting receipt and review of related documents (Technical Memorandum, Limited Feasibility Study, Site 36, Building 3380, dated August 2, 1994, received November 4, 1994; and Technical Memorandum, Building 3380 Soil Investigation, Preliminary Site Characterization Results Summary, dated August 19, 1994, received November 18, 1994) as well as conference calls and meetings to discuss these documents. During this delay, with commencement of BRAC construction in the beginning of 1995 and the need to remove/remediate the soils before construction, Bechtel, the Remedial Action Contractor (RAC), mobilized and implemented the soil removal and remediation prior to the approval of this document. Upon receipt of all the information, there are still data gaps in the delineation and characterization of soil contamination and possible RCRA considerations associated with treatment and/or transport of potentially hazardous waste.

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Since the Work Plan has already been implemented, only general comments will be provided. Additionally, to prevent possible problems in the future, recommendations are also provided:

1. All documentation should be distributed to all Pensacola Tier 1 Team Members and other related personnel in a timely manner in order to allow sufficient time for documents to be approved before the commencement of work.
2. Petroleum and IR sites should be treated separately. IR Site 3380 contained solvents in the soil and the Low Temperature Treatment Desorption system was only permitted for the treatment of petroleum contaminated soils. If the soil tests positive for TCLP or if the source of the solvent is determined to be post 1980, then RCRA regulations associated with treatment, transport, storage and distribution of hazardous waste would need to be followed. Therefore, to avoid possible RCRA violations, as soon as problems are discovered, such as solvents detected in soil, the Tier 1 Team in conjunction with DEP's District Office and other related personnel should be informed so appropriate and timely decisions can be made.
3. Other ARARs besides the criteria used for thermal treatment of petroleum contaminated soils (Chapter 62-775, F.A.C.), such as the Soil Cleanup Goals (DEP Memorandum, July 5, 1994), should be considered for IR sites.
4. With solvent contamination in soil and groundwater adjacent to Site 3380, all possible sources should be identified prior to BRAC construction.
5. The delineation of the horizontal and vertical extent of soil contamination should be conducted prior to BRAC construction. SVOCs and PCE were detected in soils above the Florida Soil Cleanup Goals at the most distal sampling locations. Specifically, additional soil samples are needed to delineated SVOC contamination detected in 36825 and 361526, and PCE contamination in 36829. However, since removal/remediation has already commenced, confirmatory samples from the excavated soil and the soils around the perimeter of the excavations should be collected for analysis. The soil sampling should follow the protocol of the November 23, 1994 Tier 1 Team letter submitted by Henry Beiro to B. K. Moring. Note, samples 36S25 and 36S26 are adjacent to wetlands, necessitating sediment and surface water sampling,

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and the appropriate Natural Resource Trustees should be consulted.

6. Confirmatory sampling should be collected using Level III or IV methodology. The use of DQO Level 1, as stated in Section 5.2.3, is not acceptable.
7. A Comprehensive Quality Assurance Project Plan (ComQUAPP) in accordance with 62-160, F.A.C. should be submitted to DEP's Quality Assurance Section by all contractors collecting samples.
 - a. All technical documents should be signed and sealed by a State of Florida certified professional.

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
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Phil Crotwell, Bechtel
Tom Moody, FDEP Northwest District
John Mitchell, FDEP Natural Resource Trustee

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