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5090.3a

February 13, 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: Draft Remedial Investigation, Site 39 (Oak Grove  
Campground), Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject document, dated November 30, 1994 (received December 5, 1994). Unfortunately, inconsistencies between the text, tables and figures, prevents approval of this document at this time. Note, documents should not be submitted with avoidable errors. Thus, before this document is resubmitted, a thorough peer review should be conducted to improve quality control. The following comments should be addressed before the document is considered final:

1. Report Document Page: The final RI, as well as all final technical documents, should be signed and sealed by a valid State of Florida certified professional. This page documents an expired professional certification.
2. Page 5-1: It should be noted that Sampling and Analysis Plans are reviewed and approved by both FDEP and EPA.
3. The analytical results of SVOCs in soils (Table 7-2) for samples 39S0101 to 3980403 is repeated three times and the data for the other soil samples (39S05, 39806, 39S08, 39809, 39S10 and 39S11) is not provided. This error should be corrected.
4. In Section 7.0 figures, the specific contaminants in soil and groundwater should be denoted, because the regulations are chemical specific. As stated many times in meetings and in

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review comments to previous documents, information should be presented in the clearest manner possible, such as plotting specific contaminant levels on figures, to increase document review efficiency.

5. Arsenic is above the Florida Soil Cleanup Goal of 0.7 ppm in post-removal confirmatory sample 39809 at 2.2 ppm. Comparisons to the background values were not available since they were not provided.
6. The analytical results of Metals in Groundwater (Table 7-7) for wells 39S01 to 39S04 were repeated four times and the results of the other wells (39GI05 to 396107) were not provided. This error should be corrected.
7. Monitoring wells 39GS02 and 39GS03 should be resampled using the "low-flow technique" to confirm the levels of aluminum and iron detected many times above the source and upgradient well samples.
8. The sample identification numbers of monitoring wells in Appendices F and G do not agree with the tables and figures. For example, in the appendix the analytical results of monitoring well 39GI005 is given; however, this well does not exist at this site. Explanation/correction is needed.
9. What was the technical reasoning behind the placement of the intermediate wells at this site? Intermediate well locations were not proposed/approved in the Final Sampling and Analysis Plan (1993). Intermediate wells are generally installed adjacent to the source well if contamination is detected above action levels in the source well. However, at this site, the source well does not contain contamination above action levels. Thus, it appears that intermediate wells 39GI06 and 39GI07 were unnecessary, and even if necessary were not installed in the most advantageous positions.
10. The quantitation limits used for groundwater sample analysis are above Florida Primary, Secondary and "free from" Water Quality Standards (Chapters 62-520 and 62-550, F.A.C). Contract Lab Protocol (CLP) should be adjusted so the quantitation limits are at or below State standards. However, to avoid reanalyzing every sample, samples do not need to be reanalyzed if the samples were not diluted before analysis, if estimated values can be provided, and if significant soil contamination is not present. In the future, the reasoning behind sample dilution should be explained to avoid confusion and facilitate document review.

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As agreed in the June 27-29, 1994 meeting, screening data (predilution) will be provided and assessment phases beyond screening will use quantitation limit analyses at or below State Water Quality standards. This information has been repeatedly requested for many other sites since July 1994 and has not been provided.

11. Selection of Chemical of Potential Concern (COPC) (Section 10.2.4, page 10-10) for carcinogenic chemicals of concern (COCs) ( $1E-4$  to  $1E-6$ ) and hazard quotients (10, 1 and 0.1) for non-carcinogenic COCs are not acceptable. With the inclusion of the inhalation pathway in the calculation of RGOs/Cleanup Levels, PDEP only considers  $1E-6$  for carcinogenic COCs and 1.0 hazard quotient for non-carcinogenic COCs acceptable. Therefore, the cancer risks and hazard quotients of the COPCs above these levels should be renamed COCs, in the consideration of the soil, sediment and groundwater as areas of possible remediation.
12. Another helpful means to expedite review would be to reorganize appendices of analytical results, so all the soil and groundwater is together and the quality control data is separate.

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, Knoxville, TN  
Tom Moody, FDEP Northwest District  
John Mitchell, FDEP Natural Resource Trustee

TJB   *TJB*  

JJC   *JJC*  

ESN   *ESN*