FLORIDA

Department of Environmental Protec...

32501.036
09.01.36.0018

Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia E. Wetherell
Secretary

N00204.AR.000877
NAS PENSACOLA
5090.3a

March 1, 1995

CERTIFIED NAIL
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 Technical Memorandum, Category VIII, Site 36, Phase I, Preliminary Site Characterization Results Summary, AVGAS Line Area, Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject document, dated January 16, 1995 (received January 17, 1995). This document was discussed during the 2/1/95 conference call with the Tier 1 Team and DEP's Northwest District representative Bill Kellenberger, and at the 2/22/95 meeting with Tier 1 Team and DEP's Northwest District Air Program. The comments below include decisions reached at these meetings as well as recommendations to avoid problems, as encountered with Sites 2662W and 3380. The comments should be addressed in the next document concerning either of these two sites:

1. Figures 5-1 to 5-3: The purpose of the document should be clearly stated and include relevant figures containing sampling locations and results. Since the purpose of this document is to report the soil and groundwater contamination around the AVGAS pipeline where it crosses the southwest section of the Industrial Waste Treatment Line (Category VIII, Site 36), the AVGAS pipeline should be included on the figures. Additionally, since this document only discusses the results of six sample locations (36S01, 36S03, 36S05, 36S06, 36S07 and 36814) of the total 37 soil borings and 22 temporary monitoring wells, the other sample points on the figures should be deleted or a denotation made to differentiate the six samples from the rest of the samples. Otherwise, a comparison of the sample locations and results

represented on the figures gives a bias perspective of less contamination then actually detected.

2. Section 5.2.2: The text should be consistent with the tables, figures and appendices. For example, dibromochloromethane was detected in groundwater samples 36GR01 and 36GP03 at 2.0 ppb and 3.0 ppb respectively, above the Florida Guidance Concentration of 1.0 ppb, but was not discussed in the text and tables. Thus, there is more than just petroleum derived VOCs in groundwater, with the chlorinated solvent possibly having leaked from the IWTP line.

3. Section 6.0: As per the Pensacola Tier 1 Team (including FDEP Northwest District representative Bill Kellenberger) conference call on 2/1/95, the removal of the AVGAS pipeline will not require a significant amount of soil from the intersection of Site 36 and the AVGAS pipeline to be removed. Therefore, it is acceptable to place back into the trench the small amount of soil that will be removed during excavation (if not contaminated with petroleum product); with the understanding that the soils will be removed by the construction contractor (George Hyman) at a later date based on full-scan analysis, and be transferred to a RCRA approved holding container for transport to an appropriate facility. The soils scheduled for removal should include soils samples with detected levels of constituents above the PRGs identified in this document. Not noted for removal is soil contaminated with arsenic, sample 36GR14 with a detected level of 1.9 ppm (PRG of 0.711 ppm), thus, this soil should also be excavated.

4. Section 6.0: SVOCs and inorganics detected in soil were above the PRGs, thus, at concentrations above trace levels. Therefore, the sentence "Analytical results of soil samples collected from the study area indicate trace concentrations of VOCs, SVOCs, PCBs, pesticides and inorganic compounds" should be modified.

5. The appropriate DEP District program should be consulted when addressing issues concerning implementation of actions that normally require permits. For example, when considering soil remediation, such as incineration, the Air Program should be consulted; and when considering removal of dredge spoil areas, the Dredge and Fill Program should be consulted.

6. Appendix C: In this document as in most documents submitted for NAS Pensacola, the quantitation limits used for groundwater sample analyses are many times above Florida Primary, Secondary and "free from" Water Quality Standards (Chapters 17-520 and 17-550, F.A.C). Contract Lab Protocol (CLP) should be adjusted so the quantitation limits are at or below State standards. For example, the quantitation for naphthalene in sample 36GR01 is 11,000 ppb, which is substantially above the Florida's minimum criteria of 6.8. ppb. As agreed in the meeting June 26 to 29, 1994, screening data (predilution) will be provided and assessment phases beyond screening will use quantitation limits below CLP, in order to consider the Florida Water Quality Standards. However, this requested information has not been provided for any sites at NAS Pensacola. Unless, this information is provided, resampling will be needed.

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: Bill Kellenberger, FDEP Northwest District
Tom Moody, FDEP Northwest District
Ron Joyner, NAS Pensacola
Allison Humphris, EPA Region IV
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Phil Crotwell, Bechtel, Knoxville, TN
Mark Diblin, ABB, Tallahassee
John Mitchell, FDEP Natural Resource Trustee

TJB 5 JJC JJC ESN ESN