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June 26, 1995

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NAS PENSACOLA
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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 Final Sampling and Analysis Plans (SAPs) for
Category 6 Sites (Sites 15, 17, 18, 24, and 28), Naval
Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject documents, dated March 1, 1995 (received March 2, 1995). The following comments should be addressed:

Section 4.0 (All Sites):

1. The submission of a separate SAP for each site appears to be an unnecessary cost, because the bulk of information presented in each SAP is identical in all SAPs. The submission of one SAP for Category VI sites should be considered.
2. Unless the proposed Phase I work (source identification and determination of nature of contamination) was not conducted by previous investigations, duplication of this work does not appear worthwhile or cost-effective use of diminishing funds.
3. In order to determine if sufficient sampling has already been conducted, and if not, the best locations for subsequent sampling; the results from the previous investigations should be summarized, with figures showing sample locations.
4. If the Geraghty & Miller monitoring wells were properly installed and are functional, they should be resampled before finalizing the location of the proposed monitoring wells.

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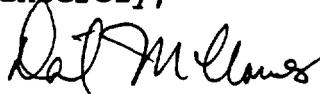
5. Sample locations should be based not only on grain size/TOC, but also on proximity to sources of contamination. For example, soil should be sampled if possibly impacted by an area of contamination, even if the soil is coarse grained.
6. The updated, April 5, 1995, Florida Soil Cleanup Goals should be utilized.
7. The cost benefit of collecting additional media samples to develop site-specific leachability numbers is questionable, especially since DEP has already developed leachability numbers. The additional cost would be better spent in delineating contamination or for site remediation.
8. Though temporary wells are acceptable in delineating groundwater contamination, the cost savings between the proposed temporary wells ("ungrouted permanent wells") and permanent wells appears questionable; especially if wells need to be resampled during subsequent phases of assessment and/or remediation. However, the utilization of direct push temporary wells in the screening phase may decrease groundwater assessment costs. Note, all temporary wells should be properly abandoned as soon as installed and sampled.
9. The specific information in the site histories that would exclude the need to sample for hexavalent chromium should be provided.

Site 15 (Pesticide Rinse Disposal Area):

10. Figure 4-1: Unless analytical data can be provided from the Former Holding Tank Location (southeast corner of site), soil samples should be collected at this location.
11. Figure 4-1: If groundwater flow is to the north, the locations of the proposed temporary wells appear reasonable.

If I can be of any further assistance with this matter, please contact me at (904) 921-9989.

Sincerely,



David M. Clowes, P.G.
Remedial Project Manager

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/dmc

cc: Ron Joyner, NAS Pensacola
Allison Humphris, EPA Region IV
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