

Department of Environmental Protection

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NAS PENSACOLA

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October 3, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Draft Preliminary Site Characterization Report Site 10, NAS
Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated May 10, 1995 (received May 11, 1995). The following comments need to be addressed.

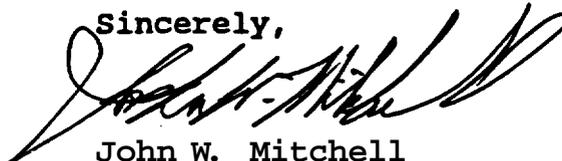
1. In Section 6.0 (Contamination Assessment) the USEPA Region IV Draft Sediment Screening Values (SSVs) are defined as Preliminary Remediation Goals for sediment. The SSVs nor the FDEP Sediment Quality Assessment Guidelines (SQAGs) were not meant to be viewed as remediation goals, but as ways to determine risk for ecological receptors. However, if the SSVs are to be used as PRGs, then the SQAGs Threatened Effects Level (TEL) should also be included as PRGs related to ecological receptors. Also, the FDEP Soil Cleanup Goals for Military Sites should be included for sediment as it relates to human receptors.
2. For easier review, Table 6-2 (Summary Analytical Results for Soil Samples) and Table 6-3 (Summary Analytical Results for Groundwater Samples) should also include a column showing the reference concentrations.
3. We do not agree with the recommendation (Section 9.0) to not further delineate the pesticide (Dieldrin) contamination related to surface soil sample 10S0101. We agree this contamination may not be from the Site 10 historical activities (i.e., underwater timber storage in Commodores Pond). We also agree that the dieldrin levels may be from anthropogenic activities (i.e., surface runoff from

upgradient drainage). However, the level of contamination is 10 times the states cleanup goal for dieldrin, and nearly 20 times the USEPA Region III RBCs. This area of pesticide contamination needs to be further delineated and possibly some interim removal action taken before a no further action decision can be approved for this site.

4. Appendix D indicates the FDEP Soil Cleanup Goals (CGs) of July 5, 1994. The most recent FDEP CGs (April 5, 1995) should be included in this appendix, as well as throughout the document.
5. Appendix E includes a table which summarizes the analytical results for background groundwater samples. In the column FPDWS, guidance concentrations which do not have a primary or secondary standard should also be included (e.g., vanadium = 49 $\mu\text{g/L}$).

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

Sincerely,



John W. Mitchell
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola
Jay Bassett, USEPA Region IV
~~Henry Beiro/Brian Caldwell~~, Ensaf, Pensacola
Steve Cowan, Bechtel, Knoxville
Tom Moody, FDEP Northwest District
Pat Kingcade, OGC/Trustee File

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