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NAS PENSACOLA  
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Mr. John Mitchell  
Florida Department of Environmental Protection  
Federal Facilities Coordinator  
Twin Towers Office Building  
2600 Stone Road  
Tallahassee, FL 32399-2400

Re: Final Site 10 and 14 Preliminary Site Characterization Reports  
NAS Pensacola, Contract # N62467-89-D-0318\CTO-070

~~Dear~~ Mr. Mitchell:

Please find enclosed seven copies of the Final PSC reports for Sites 10 and 14. Both Final PSC reports have been revised to address issues discussed and agreed upon during recent Tier 1 team partnering meetings. Where written comments were received, responses to those comments are included as attachments to the reports. The Site 10 report includes only errata pages for revisions to the May 10, 1995 draft PSC. Please replace the corresponding Site 10 draft PSC pages with these revised pages. The Site 14 report was revised and is being submitted in its entirety as final. Appropriate copies are also being submitted to SOUTHNAVFACENGCOCM, EPA, NOAA, and NAS Pensacola representatives as directed.

Please contact me with any questions, or if you need additional information.

Sincerely,

EnSafe/Allen & Hoshall

  
Brian E. Caldwell  
Task Order Manager

Enclosure

- cc: Bill Hill, SOUTHNAVFACENGCOCM — 2 copies  
Ron Joyner, NAS — 7 copy  
Tom Moody, FDEP — cover letter only  
John Lindsey, USDC — 1 copy  
Jay Bassett, USEPA — 5 copies  
Patricia Kincaid, FDEP — 1 copy  
EnSafe/Allen & Hoshall file — 1 copy  
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EnSafe/Allen & Hoshall Pensacola file — 1 copy

**DEPARTMENT OF ENVIRONMENTAL PROTECTION  
TECHNICAL REVIEW AND COMMENTS  
DRAFT PRELIMINARY SITE CHARACTERIZATION REPORT  
SCREENING SITE 10 (COMMODORE'S POND)  
NAVAL AIR STATION (NAS) PENSACOLA, FLORIDA**

**COMMENT:**

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.

**RESPONSE:**

As agreed during the recent Tier I team partnering meeting, for screening purposes the Site 10 PSC report has been revised to include a comparison of USEPA Region IV Sediment Screening Values and **FDEP** Soil Cleanup Goals to site sediment sample results. Corresponding errata pages are provided.

**COMMENT:**

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.

**RESPONSE:**

Tables 6-2 and 6-3 have been revised accordingly and are submitted as errata pages.

**COMMENT:**

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 Commodore's 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.

**RESPONSE:**

As agreed during the recent Tier 1 team partnering meeting, a recommendation of "no further action" has been included in the revised **PSC** report, along with a recommended modification to the facility's master development plan to require the surface soil dieldrin concentration be further evaluated if residential development of the site is considered in the future. Corresponding errata pages are provided.

**COMMENT:**

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.

**RESPONSE:**

The PSC report tables for Section 6 and Appendix D have been revised to include the updated FDEP CGs. Corresponding errata pages are provided.

**COMMENT:**

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  $\mu\text{g/L}$** ).

**RESPONSE:**

Applicable Florida Groundwater Guidance Concentrations have been added to the Appendix E table. Corresponding errata pages are provided.

**COMMENT:**

6. Our only comment concerns the level of dieldrin concentrations at surface soil sampling station 10S0101 and 10S0201, and subsurface sampling station 10S0207. Although dieldrin concentrations at the surface may be from anthropogenic activities, it is highly insoluble except under certain conditions (i.e., mixed with acetone **or** benzene). The detection in the subsurface soil sample presents the question of why the dieldrin detected at the surface appears to be migrating to such an extent. [**Note: This comment was received under separate cover.**]

**RESPONSE:**

Dieldrin concentrations detected at **depth** are likely associated with soil reworking from underground utility installation, fill material introduced during the development **of** the Chevalier Field area, soil drag-down during drilling activities, or possible combinations of each. Given the fate characteristics of dieldrin, and its absence in shallow groundwater, it is not expected to have migrated a significant distance in the subsurface.