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Environmental Protection

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November 25, 1996

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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  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Draft Remedial Investigation Report OU 2, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated July 26, 1996 (Received July 26, 1996), and provide the following comments.

1. The Table of Contents on page v should list and title the Appendices.
2. In Section 6.3.2 (Tidal Influence), Table 6-4 shows only the tidal influence for Site 27 wells; not the monitoring wells for Sites 11 and 30 indicated on Page 6-6. Also, Monitoring Well 11GI08 is not shown in Figure 3.
3. Section 6.5 (Surface Water Hydrology) indicates there are no active streams at OU2. This is incorrect. The drainage at Site 30 from Wetland 5 through Wetland 5b and Wetland 6 has continuous flow and was likely a natural stream prior channelization.
4. Section 7.1.1.1 (VOC Surface Soil Contamination) states no VOC were observed in surface soil. Figure 4 indicates that sample 25GS03 exceeded for vinyl chloride. Also, this section attempts to write off chloroform detection as a false positive based upon nebulous assumptions. This should be better clarified. Also, chloromethane may be found at low levels in tap water, but I am unaware of chloroform being used as a supplement to tap water.
5. Section 7.1.1.2 (VOC Subsurface Soil Contamination) states benzene is likely a false positive and is a common

laboratory artifact. This is not likely. However, the detections of methylene chloride, acetone, chloromethane and chloroform may be found as laboratory contaminants. They could also be contaminants in the soil. Were these constituents found at significant levels in the laboratory blanks? If not, they are likely of concern in the soil.

6. In Section 7.2 (Groundwater), a Table indicating those wells sampled in Phase II would be beneficial for review. This would also be of use in the figures.
7. In Section 7.0 (Nature and Extent of Contamination) a Section needs to be included for surface water analytical results. If there are no surface water results, then this should be noted in Section 7.5 (Data Gaps).
8. Section 7.6 (Current and Potential Receptors) indicates that the coastal waters in and around NAS Pensacola are Class II which is for Shellfish Harvesting and Propagation, rather than for Recreation and Maintenance of Fish and Wildlife Population which would be Class III.
9. Section 8.1.3 (Blanks) indicates detection of pesticides in blank samples. The reason given is due to the labs practice of reporting pesticide results below their method detection limits. It seems to me that pesticides would not be commonly found or detected in any lab blanks unless there is poor handling and cleaning practices by the lab.
10. Section 8.5 (Conclusion of Data Validation) states that validation reports will only be a part of the Final OU 2 report Reference File. They should be a part of all final documents, as well as part of drafts for review.
- 1.1. Table 9-2 (Fate and Transport - Travel Time Analysis) is very confusing. It appears that groundwater at Sites 12, 25, 26 and 27 reaches the nearest surface water body sooner than Site 11. However, the groundwater from these sites migrates through Site 11 which is directly adjacent to the surface water body, Bayou Grande. Please correct your calculations.
12. I have some general comments related to Section 10 (Baseline Risk Assessment). In determining Exposure Point Concentrations, either the 95% UCL or Arithmetic Mean was used based on Supplemental Guidance to RAGS, EPA Region IV Bulletin 3 (1995). I believe this was interpreted incorrectly. According to the bulletin, the arithmetic mean is to be used for hot spot areas and only the arithmetic mean of those wells concentrated in the hot spot. The BRA used the arithmetic mean of all detections. Also, the BRA

uses the UCL, the arithmetic mean, or the maximum detection value. This is mixing two different approaches. It should be one method or the other, not both. Due to the extent of the contaminant plume and exceedences of screening values throughout the site area, the 95% UCL should be used or the maximum detected concentration if the UCL exceeds the maximum. Please see comments from Dr. Steve Roberts.

13. Section 10.3.1.6 (Risk Uncertainty) indicates that "exposure to current surface soil would be unlikely under a true future residential scenario" based on the assumption that buildings would be demolished, asphalt surfaces would be removed, and wetland areas would be filled." If buildings were destroyed and asphalt surfaces removed, the likelihood of potential contact with surface soil increases due to its being uncovered. Wetlands would likely not be filled unless a permit was received and mitigation approved. Also, due to the low elevation of the property, any homes would probably be elevated (stilt homes) and surface soil continuing to be exposed.
14. In Section 11.2 (Recommendations) it states that no data gaps are noted which would limit development of a feasibility study. Surface water analysis in the adjacent wetlands and Bayou Grande is a data gap which could effect types and choice of remedial alternatives. It states this will be addressed with the Site 40 and 41 investigation. Since surface water standards may be or are exceeded, and wetland sediment have been impacted, the FS must address groundwater related to discharge.

Also, this section states Phase I groundwater is deemed inappropriate to evaluate nature and extent due to turbidity. This may be relevant to inorganic constituents. However, organic contaminants correlated well to Phase II data. Therefore, Phase I groundwater data is relevant for organic contamination.

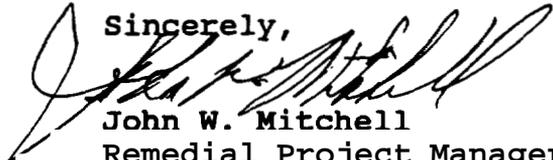
15. Appendix G (Figures) was beneficial in that it broke down constituent exceedences of Preliminary Remediation Goals (PRG) by soil and groundwater for each specific site. However, the figures encompassed all of OU 2 and it became difficult to review and analyze the data for each site because of the clutter of all sampling locations being shown on each figure. It would be nice to have the overall figure showing soil and groundwater sampling locations as in Figures 1 and 2. Site specific figures would be beneficial to better analyze the sites related to their specific contamination. Also, if a contaminant plume exists, a figure showing the contaminant contours would enhance review

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RI Operable Unit 2  
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for purposes of determining nature and extent, and for reviewing remedial alternatives in the feasibility study.

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  
Gena Townsend, USEPA Region IV  
Henry Beiro/Brian Caldwell, EnSafe, Pensacola  
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