

Department of Environmental Protection

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NAS PENSACOLA
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Governor

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Virginia B. Wetherell
Secretary

November 25, 1996

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: Final Remedial Investigation Report Site 38, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document submitted August 12, 1996 (received August 15, 1996), and provide the following comments.

1. In Section 7.0 (Nature and Extent of Contamination), on page 5-7, subsection Establishment of Background indicates the background analytical results for soil and groundwater are in Appendix G. Appendix G only contained hydrologic data. The inorganic reference values are shown in Appendix K, but the background analytical data is missing from the report.
2. Section 7.2.3 (Summary of Groundwater Contamination at Site 38) indicates that aluminum, iron, manganese and lead exceedences of MCLs may represent ambient conditions. Although some upgradient and side gradient wells had exceedences of primary and secondary drinking water standards, the highest concentrations were located at the source area and in downgradient wells. The secondary standards exceeded for aluminum and iron also exceeded the reference concentration at the source area indicating the site is a likely source or the cause of these analytes releasing from the soil. The exceedences in upgradient and side gradient wells indicates the possibility of another source.
3. 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

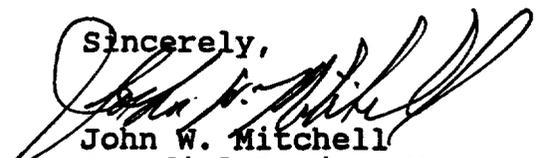
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Bulletin 3 (1995). I believe this was interpreted incorrectly. According to the bulletin, the arithmetic mean is to be used for hot spot areas and only the arithmetic mean of those wells concentrated in the hot spot. The BRA used the arithmetic mean 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.

4. Also in Section 10, on page 10-72, the document indicates MCL exceedences for aluminum, iron, manganese, and lead may be from ambient conditions. Please see Comment 2.
5. Section 11.0 (Ecological Risk Assessment) indicates potential risk to marine receptors due to groundwater migration and that Florida Surface Water Quality Standards (FSWQS) were exceeded for PCE and TCE in monitoring wells GS32 and GWT03, and for lead in wells GWT03 and GWT18. Our main concern would be in the well most downgradient at the site and nearest the surface water body. These wells would be GS32 for Building 604, and wells GS03, GS13, GS02, and GS23 for Building 71. The FSWQS were exceeded for aluminum, iron, and lead in well GS03; for aluminum, cadmium, chromium, iron, and lead in well GS13; for iron and lead in well GS02.

It also indicates that it is difficult to interpret the PCE and TCE FSWQS exceedences in well GS32 as the standard is an annual average. For clarification, the annual average is based on the number of samples taken annually. In the case of a single sample in one year, that is the average. Therefore, the FSWQS is exceeded in well GS32. To determine if the FSWQS is actually being exceeded in Pensacola Bay, you could sample and analyze the sediment pore water or water from a seepage meter taken or placed, respectively, adjacent to the seawall downgradient of these wells.

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

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cc: Ron Joyner, NAS Pensacola
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