

Department of
Environmental Protection

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NAS PENSACOLA
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Lawton Chiles
Governor

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Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 14, 1997

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 Preliminary Site Characterization Report Site 7, NAS
Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated January 17, 1997 (received January 21, 1997) and provide the following comments:

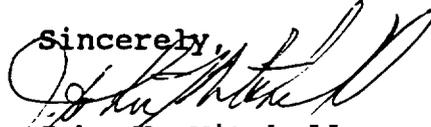
1. Section 6.1 (Soil Assessment) states only aluminum exceeds its soil reference concentration and that aluminum, arsenic and iron all exceed their PRGs and USEPA Region III RBC. Arsenic (4.0 mg/kg) and iron (13,100 mg/kg) also exceeded there reference concentrations of 1.56 mg/kg and 2,745 mg/kg, respectively. Aluminum does not exceed the Florida Soil Cleanup Goal (SCG) and iron has no SCG, However, arsenic exceeded the SCG of 0.8 mg/kg.
2. In Section 6.3 (Summary and Conclusions), delete the last two sentences of the first paragraph. Comparison of the inorganic constituents to frequencies of detection at other sites is inappropriate, Comparison should be made to the screening values (i.e., Region III RBCs; Florida SCGs; and NAS Pensacola Background Reference). Arsenic, aluminum and iron were detected at 4.0 mg/kg, 11,800 mg/kg, and 13,100 mg/kg, respectively, in one soil sample. As stated in the previous comment these detections exceeded their respective background reference values.
3. In Section 9.0 (Conclusions and Recommendations), the first bullet should reflect what I indicated in Comment No. 2. Also, I do not necessarily agree with the no further action (NFA) recommendation considering arsenic exceeded its PRGs.

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Although only one of four samples had this exceedence, the other sampling locations were hundreds of feet away. There could be an isolated area around the one sampling location which could pose a risk. However, an interim action to remove this area of soil contamination could lead to NFA for this site.

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
Allison Dennen, EnSafe, Memphis
Karen Atchley, Bechtel, Knoxville
Tom Moody, FDEP Northwest District
Pat Kingcade, OGC/Trustee File

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