

Department of Environmental Protection

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NAS PENSACOLA
5090.3a

March 17, 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 4, NAS
Pensacola*

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated January 17, 1997 (received January 21, 1997). Although I agree with the conclusion that no further action (NFA) may be possible at this site, the following comments need to be addressed for the final document.

1. The acronym "PPS" noted in Tables 4-1 and 4-2 needs to be defined either in the Table notes or in the Acronym List at the beginning of the document.
2. Figure 5-1 (Shallow Surficial Piezometric Surface) indicates groundwater flow to the northwest. This should be corrected. Based on the water elevation in monitoring well 04GS02, it appears that this may be at a potentiometric high. The two monitoring wells to the northeast (04GS03) and to the southwest (04GS01) have a lower groundwater elevation than 04GS02 indicating flow could be both toward the northeast and to the southwest from this well. This assumption is based on the locations of the nearest surface water bodies (Bayou Grande to the north and Pensacola Bay to the south). This would also be more reflective of the text in Section 5.2 which states: "Groundwater generally flows toward the Intercoastal Waterway/Pensacola Bay." If there is other groundwater flow direction known from other sites near this area which could better define the likely gradient, I suggest noting this in the text.

Bill Hill
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Draft PSCR Site 4
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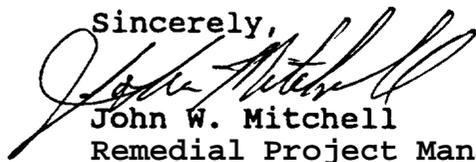
3. In Section 6.3 (Summary and Conclusions), delete the last two sentences of the first paragraph. Comparison of the inorganic constituents to frequencies of detection at other sites is inappropriate. Comparison should be made to the screening values (i.e., Region III RBCs; Florida SCGs; and NAS Pensacola Background Reference). Arsenic was detected at 3.0 mg/kg which is twice the reference value of 1.56 mg/kg. This is also at the same sampling location where Benzo(a)pyrene (.14 mg/kg) exceeded the SCG of .1 mg/kg. However, I agree with the analysis that this sample was taken next to a building and adjacent to a parking lot; therefore allowing for the likelihood of runoff of PAHs from the parking lot and for an area of likely pesticide application. Arsenic based pesticides are known to have been used at NAS Pensacola. These are the types of comparative analysis which would lend credence to a NFA decision for this site. Also, this area is near the industrial flight area for Forest Sherman Field.

Also in this section, the first sentence of the second paragraph implies that this sample was taken below an overlying asphalt. According to the monitoring well boring logs, this sample area is grassy. The document figures indicate that the sample is adjacent to paved parking. The text should be corrected.

4. In Section 9.0 (Conclusions and Recommendations), the first bullet should reflect what I indicated in Comment No. 3.

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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