

# Department of Environmental Protection

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NAS PENSACOLA  
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2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 14, 1997

CERTIFIED MAIL  
RETURN RECEIPT ONLY

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, Site 15, NAS Pensacola

Dear Mr. Hill:

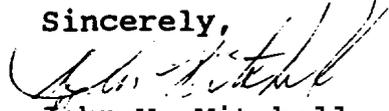
I have completed the technical review of the above referenced document dated May 23, 1997 (received May 28, 1997) and provide the following comments. Also, please address the comments in the attached memorandum from David Grabka.

1. In Figure 2-1 (Site Location Map), the site is improperly located. It should be east of the golf course pond.
2. In Table 9-1 (Exposure Pathways Summary), I do not agree with eliminating from evaluation the Air Inhalation Pathway for chemicals entrained in fugitive dust for Current Site Users/Maintenance. This area is heavily traveled by trucks, tractors, and mowers which would increase fugitive dust occurring at the site. Also for the current site worker, what is meant by the "qualified" no for assessment of soil ingestion and dermal contact? This should be clarified in the footnotes.
3. For the Baseline Risk Assessment (BLRA), both the Reasonable Maximum Exposure (RME) and Central Tendency (CT) were calculated. Although this follows USEPA risk assessment guidance, FDEP only accepts RME; not CT.

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Drat RI Site 15  
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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, EnSafe, Pensacola  
Brian Caldwell, EnSafe, Knoxville  
Allison Dennen, EnSafe, Memphis  
Karen Atchley, Bechtel, Knoxville  
Tom Moody, FDEP Northwest District  
Pat Kingcade, OGC/Trustee File

TJB

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JJC

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ESN

ESN

**Memorandum**

TO: John Mitchell, E.S. III, Remedial Project Manager

**THROUGH:** Tim Bahr, P.G. Supervisor, Technical Review Section *TB*

FROM: David P. Grabka, E.S. I, Technical Review Section *DG*

DATE: June 17, 1997

**SUBJECT:** **NAS** Pensacola, Site 15, Draft Remedial Investigation Report, 5/23/97

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I have reviewed the Draft Remedial Investigation Report submitted by Ensafe/Allen & Hoshall for the above-reference site.

(1) Based on inferred contours on figures 6-3 and 6-5 and levels above the preliminary remediation goals (PRGs) further assessment is necessary to determine the lateral extent of arsenic and dieldrin contamination in surface soil. Soil borings and analyticals for the following locations are suggested:

- (a) six soil borings in the holding tank contents disposal area; **50'** northwest and **50'** southwest of 15S53; **50'** northeast, **50'** southeast and **50'** southwest of 15S55 and **50'** south of 15S10. Soil samples should be analyzed for arsenic.
- (b) three soil borings west of building 2640; **30'** west and **30'** south of 15S41 and **30'** south of 15S42 for arsenic, pesticides and PCBs;
- (c) three ~~soil~~ borings west of building 2692; **30'** north, **30'** south and **30'** west of 15S57 for pesticides;
- (d) three soil borings between buildings 2640, 2692 and 747; **30'** east of 15S61; **40'** northeast and **30'** east of 15S05 for arsenic and pesticides;
- (e) two soil borings northeast of building **747**; **50'** east and **50'** southeast of 15S58 for arsenic;
- (f) four soil borings around building 3586; **30'** northwest of 15S64, **30'** west of 15S07, **30'** southwest of 15S20 and **30'** east of 15S21 for arsenic;
- (g) one soil boring north of building 3447; **30'** north of 15S50 for pesticides.

(2) Further assessment of arsenic contamination in groundwater is necessary. Monitoring wells should be installed **50'** west of 15GR65, **80'** downgradient of 15GR65, **40'** east of 15GR66 and **80'** downgradient of 15GR66 and **30'** upgradient of 15GR07. Monitoring wells should be constructed **so** that the screen intercepts the water table.

Memorandum to John Mitchell  
NAS Pensacola, Site 15, Draft RI  
June 17, 1997  
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(3) Monitoring well 15GS68 should **be resampled** and analyzed for pesticides to verify the **elevated level** of Dieldrin found during the Phase III-C sampling event. Although the **concentration** of Dieldrin detected in this well (.11  $\mu\text{g/l}$ ) only slightly exceeds the **preliminary** remedial goal of .10  $\mu\text{g/l}$  (Florida Groundwater Guidance Concentration), the concentration detected greatly exceeds the Surface Water Quality Standard of .0019  $\mu\text{g/l}$ . Monitoring **well** 15GS68 is located immediately adjacent to Bayou Grande and groundwater in **this** vicinity can be expected to discharge into Bayou Grande. Surface water and sediment quality in this area will be evaluated **as** part of separate remedial investigations for Sites **40** and **41**.

(4) If elevated levels of Dieldrin are confirmed in 15GS68, soil sampling immediately upgradient should be conducted to determine its **source**.

(5) Preliminary Remediation Goals (**PRGs**) for Soil Contaminants listed in Appendix D should have current **FDEP** Soil Cleanup Guidance Concentrations for arsenic, 1,1-dichloromethene, **cis-1,2-dichloroethene**, **trans-1,2-dichloroethene**, tetrachloroethene (PCE), **trichloroethene** (TCE) and vinyl chloride.