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NAS PENSACOLA
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July 31,1997

Florida Department of Environmental Protection
Attn: John Mitchell
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Final Preliminary Site Characterization Report Responses to FDEP
Comment and Errata Pages,
Site 4, NAS Pensacola
Contract # N62467-89-D-0318/970

Dear Mr. Mitchell:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit two copies of the response to FDEP comments and the errata pages for the Final Preliminary Site Characterization Report for Site 4 at the Naval Air Station Pensacola in Pensacola, Florida. USEPA concurred with the no further action decision in a letter dated July 3, 1997.

If you should have any questions or need any additional information regarding the document, please do not hesitate to call me.

Sincerely,

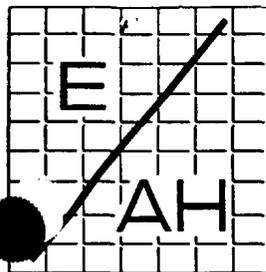
EnSafe/Allen & Hoshall



Brian Caldwell
Task Order Manager

Enclosure

cc: Patricia Kingcade, FDEP without enclosure
Tom Moody, FDEP – NW District without enclosure
Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
EnSafe/Allen & Hoshall file without enclosure
EnSafe/Allen & Hoshall Pensacola file without enclosure
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Administrative Record



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Florida Department of Environmental Protection
Response to Technical Comments
Site 4 — Army Rubble Disposal Area
Naval Air Station Pensacola

Comment 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.

Response:

The requested change **has** been made to the Acronym List.

Comment 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 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 flow 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.

Response:

Due to the uncertainty as to site-specific localized flow directions, the groundwater elevation contours have been removed from the figure. Based on the proximity of the nearest surface water of significance (Pensacola Bay), the topographic slope toward Pensacola Bay, and base-wide water level measurements, the generalized flow direction is to the southeast. This information **has** been added to the text of the report.

Comment 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.

Response:

Reference to other Naval Air Station Pensacola sites has been removed from the text. Additional information regarding potential sources has also been added, and the text clarified as to the surface condition of the sample location.

Comment 4:

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

Response:

The requested change has been made to the text.