

Department of Environmental Protection

32501.024
09.01.24.0022

Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

April 9, 1998

N00204.AR.001631
NAS PENSACOLA
5090.3a

CERTIFIED MAIL
RETURN RECEIPT REQUEST

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, Errata, Operable Unit
(OU) 13 (Sites 8 and 24), NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced Errata dated January 3, 1998 (received January 7, 1998) for the Remedial Investigation Report dated June 20, 1997 (received June 23, 1997). I cannot approve the document as final until the following comments are addressed.

1. In the Executive Summary on page xi, it indicates that inorganic soil exceedences are likely due to maintenance application of herbicides, fertilizers, and pesticides. As I commented in our Tier I Partnering meeting, the document should have verification based upon the actual types of materials used in this area (e.g., the cemetery) and the ingredients of those materials.
2. In the Executive Summary and in Section 10 (Conclusions and Recommendations), I do not agree that no further action is needed for soils and groundwater at OU 13. I agree there are no current receptors for soil at Site 8 as long as the asphalt cover remains. However, to assure that the asphalt remains in place, institutional controls (IC) would have to be implemented.

As related to groundwater, I agree that an IC (i.e., restricting groundwater usage) would be needed to assure there are no receptors. However, as there is a metals plume (specifically cadmium) at the OU, long term monitoring of the groundwater will be needed to monitor any potential migration of the contaminants as well as to monitor

Mr. Bill Hill
April 9, 1998
RI Operable Unit 13
Page 2

contaminant concentrations. The feasibility study will need to include possible active remedial alternatives for comparison with monitoring/natural attenuation, etc.

3. In Section 8.3.2, it indicates that significant attenuation of the metals exceedences occurs over very short distances. I do not necessarily agree with this analysis. The distance from the apparent source area (Site 8) and the downgradient wells is over 600 feet. The highest concentration for cadmium (23.7 $\mu\text{g}/\text{l}$) in monitoring well 08GR01 is only slightly higher than the 15.5 $\mu\text{g}/\text{l}$ of cadmium in well 24GS02 400 feet downgradient. This does not appear to be significant attenuation. Cadmium levels appear to be relatively uniform at the OU. This also appears to be true for antimony and thallium.

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
Brian Caldwell, EnSafe, Knoxville
~~Wilson Bennett~~, EnSafe, Memphis
Karen Atchley, Bechtel, Knoxville
Tom Moody, FDEP Northwest District
Tony Ettore, OGC/Trustee File

TJB

JRC
TB

JJC

JJC

ESN

ESN