



Jeb Bush  
Governor

## Department of Environmental Protection

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

David B. Struhs  
Secretary

September 8, 2000

Mr. Bill Hill, Chief, Environmental Protection (EPA) Division, Southern Division, Naval Facilities Engineering Command, 2155 Eagle Drive, P.O. Box 190010, North Charleston, South Carolina 29419-9010

RE: Letter Report Request for No Further Remedial Action, Site 34, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced letter report dated August 18, 1999 (received August 23, 1999). My review included an examination of two previously submitted documents: the Remedial Investigation Report for Sites 9, 29, and 34 submitted April 5, 1996 and Confirmation Sampling Results, Chevalier Field Removal Actions submitted June 25, 1996.

Naphthalene was detected at a concentration of 39 ug/L in a groundwater sample collected from monitoring well 34GR01 on December 14, 1994. In December 1995, 1,111.1 cubic yards of soil were removed from this area of the site during an interim remedial action and confirmation soil samples did not exhibit detectable concentrations of naphthalene. In addition, this area is no longer accessible since site structures were removed and new construction occurred over the site during Base Realignment activities at the former Chevalier Field area. I have the following comments that should be addressed before the State can concur with a No Further Remedial Action status for Site 34.

Similar to Sites 9 and 29, groundwater at Site 34 exceeds the Secondary Drinking Water Standard for manganese. Additional groundwater data should be presented to define the area of the manganese exceedence and /or establish that the elevated manganese concentrations are not site related.

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It is probable that the area of manganese exceedance extends beyond the site boundary and encompasses a portion of the former Chevalier Field area. The occurrence of manganese is also suspected to be the nature of the fill brought in to this area, and therefore, may not be attributable to the site.

Existing groundwater data (manganese concentrations and turbidity) collected for CERCLA sites in the Chevalier Field area may be utilized to evaluate the occurrence of manganese and demonstrate if manganese is endemic to this area of the facility and attributed to turbidity. I recommend that this evaluation be conducted in conjunction with a similar request (June 9, 2000) for groundwater data to support the Final Record of Decision for Operable Unit 6 (Sites 9 and 29).

If I can be of any further assistance with this matter, please contact me at (850) 921-9989.

Sincerely,

*Joseph F. Fugitt*

Joseph F. Fugitt, P.G.  
Remedial Project Manager

- cc: Ron Joyner, NAS Pensacola
- Genia Townsend, USEPA Region 4
- Brian Caldwell, EnSafe, Knoxville
- Allison Harris, EnSafe, Memphis
- Terry Hansen, Tetra Tech NUS, Inc., Tallahassee
- Charlie Goddard, FDEP, Northwest District

TJB JJC ESN