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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING TECHNICAL REVIEW OF DRAFT REMEDIAL INVESTIGATION
SITES 9, 29 AND 34 NAS PENSACOLA FL
8/21/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 21, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: Draft Remedial Investigation, Sites 9, 29 and 34, Naval
Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject documents, dated May 9, 1995 (received May 25, 1995). The following comments, as well as the enclosed comments from Ms. Jane Fugler, should be addressed:

1. The Site Management Plan (SMP) should include the schedule for the soil removals at these three sites, so the removals are performed before construction interferes/inhibits them. Depending on the Tier I Team decision, the removals can be performed as either IRAs before finalizing the RI or as Remedial Actions after the RI, with the Finalization of the RI pending on the confirmatory post-removal sampling results.

Site 9:

2. The soil scheduled for removal should include the area around soil boring 09S18, contaminated with inorganics such as copper at 47,700 ppm and lead at 51,300 ppm. The soil should be analyzed for TCLP to determine whether it is hazardous waste; and then, handled and disposed of properly. Confirmatory samples should be collected and the results submitted. If the numbers are below Florida Soil Cleanup Goals, then no further action with regard to soil will be appropriate.

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3. Since a groundwater sample was not collected in the area of highest soil contamination (09S18), a groundwater sample should be collected from this location after the soil removal.

Site 29:

4. After the proposed soil removal, due to dieldrin contamination, a groundwater sample should be collected from 29GR01 to confirm that the contamination source has been removed, and to confirm the inconsistent presence of dieldrin in the two recent sampling episodes.

Site 34:

5. Due to the presence of naphthalene at (320 ppb) in groundwater above the Florida groundwater guidance level (6.8 ppb), a no further action proposal for groundwater is not appropriate. However, if after the proposed soil removal for PAHs and lead contamination, the wells are resampled and the levels are decreasing; then the site can be considered for either monitoring or no further action if a water use deed restriction is agreed to.
6. Monitoring wells 34GS02 and 34GM6, adjacently located, have different results. 34GS02 has a detection of lead above Florida Groundwater Standards, but 34GM6 does not. Thus, to confirm the presence of lead groundwater contamination, 34GS02 should be resampled using quiescent sampling.

If I can be of any further assistance with this matter, please contact me at (904) 921-9989.

Sincerely,



David M. Clowes, P.G.
Remedial Project Manager

/dmc

cc: Ron Joyner, NAS Pensacola
Jay Bassett, EPA Region IV
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Steve Cowan, Bechtel, Knoxville, TN
Tom Moody, FDEP Northwest District
John Mitchell, FDEP Natural Resource Trustee

TJB



JJC



ESN



Memorandum

Florida Department of Environmental Protection

TO: David Clowes, DOD Facilities Technical Review

THROUGH: Jim Crane, Bureau of Waste Cleanup *JJC*

FROM: Jane Fugler, Hazardous Waste Sites Technical Review *JF*

DATE: July 14, 1995

SUBJECT: Risk Assessment Review for NAS Pensacola Sites 9, 29 and 34

I have reviewed the risk assessment portion of the May 9, 1995 "Draft Remedial Investigation Report for Sites 9, 29 and 34, NAS Pensacola". I concur with the basic conclusions of no further action for these sites; however, this is contingent upon the results in response to comment 2 below. Specific concerns and disagreements are discussed below.

1. The maps provided were not very helpful in identifying the locations discussed in the text, such as buildings 607, 630, and 3588 and the tank farm north of 3557.
2. Appendix A lists the preliminary remediation goals (PRGs) which lists FDEP and EPA 1994 screening numbers. However, comparing the soil screening values to the April 5, 1995 FDEP numbers, some values are missing or have been changed. These new numbers should be considered and may cause some significant changes.
3. Section 5 discusses the sampling of the groundwater monitoring wells in February and December, 1994 and their abandonment in March 1994 (page 5-30). Should this be March 1995?
4. Anthropomorphic compounds should not be screened against background concentrations, however they may be indicated as ubiquitous.
5. It was concluded that there is a potential risk from some of the chemicals of concern on individual sites. However, because of the current and future land uses of these sites, this risk is minimal and no further action should be employed. I agree that the 5 foot of fill, and the placement of buildings, parking lots and maintained lawns will reduce the soil exposure. However, in the far future, if this base goes into closure, the potential of exposure would exist during excavation and other land uses, and a risk assessment would need to be conducted again. Some provisions should be made to limit future land use, such as deed restrictions. This argument also pertains to the groundwater, concentrations exist now that would impose a risk if the water were used. However, it is my understanding that the current water supply is from a POTW. There was no statement of the water source lawn irrigation, this would be the only present concern.

MEMORANDUM

David Clowes, Technical Review Section

July 14, 1995

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Although this risk assessment was based on relatively current conditions, the sites can no longer be monitored since the monitoring wells have been abandoned. The industrial waste sewer line that passes through these sites is a potential source for future contamination. It is not clear whether this pipeline will remain after construction. If it does remain, the integrity of the vitreous clay pipeline should be improved and monitored.

6. Considering the current and near future land uses of these sites, the ecological risk appears to be minimal. They have delayed an in-depth assessment, which will be included in the Sites 40 and 41 ecological risk assessment. The main concerns from these sites are the drainage swales and contaminated groundwater entering the nearby surface water bodies.

/jlf

cc: Ligia Mora-Applegate

CERTIFIED

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