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LETTER FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING  
TECHNICAL REVIEW OF CONTAMINATION ASSESSMENT REPORT AT SITE 21 NAS  
PENSACOLA FL  
8/25/1997  
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 25, 1997

Mr. Byas Glover  
Code 18410  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

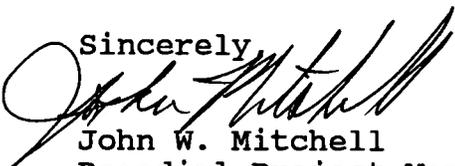
RE: Contamination Assessment Report, Site 21, Sludge at Fuel  
Tanks Area, NAS Pensacola, Florida  
Facility #179202973

Dear Mr. Glover:

I have completed the technical review of the Contamination Assessment Report (CAR) dated June 1997 (received July 15, 1997) submitted for this site (21). Please submit a Site Assessment Addendum which addresses the comments in the attached memorandum from David Grabka. Further site assessment must be performed in accordance with the newly revised Chapter 62-770, F.A.C.

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

Attachment

cc: Dean Spencer, NAS Pensacola  
Tom Moody, FDEP Northwest District

TJB T JJC JJC ESN ESN

## Memorandum

# Florida Department of Environmental Protection

**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 *DPG*

**DATE:** August 12, 1997

**SUBJECT:** NAS Pensacola, Contamination Assessment Report for Site 21, Sludge at Fuel Tanks Area

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I have completed my review of the Contamination Assessment Report (CAR) and Monitoring Only Plan (MOP) for the above-referenced site. In order to meet the requirements of Chapter 62-770, Florida Administrative Code (F.A.C.), the following comments need to be addressed:

- (1) The horizontal extent of groundwater contamination has not been adequately characterized. Water table monitoring wells should be installed 50 feet northwest of MW-11 (near southwest corner of volleyball court) and 50 feet northwest of MW-4.
- (2) The vertical extent of groundwater contamination has not been investigated. One intermediate depth monitoring wells should be installed between MW-5 and MW-11. Another intermediate well should be installed adjacent to MW-19. A third intermediate depth monitoring well should be installed adjacent to MW-4. The wells should be screened between 30 and 35 feet below land surface.
- (3) Lead concentrations in groundwater are compared to an incorrect primary standard of 50 µg/l on pages 10 and 43. Formerly, 50 µg/l was the target cleanup level and No Further Action level for lead under Chapter 62-770. The Florida Primary Drinking Water Standard (FPDWS) for lead is 15 µg/l. Lead was detected in monitoring wells MW-2, MW-5, MW-7, MW-9, MW-10, MW-11, MW-12, MW-13, MW-15, MW-16, MW-17, MW-18 and MW-19 at levels exceeding the FPDWS of 15 µg/l using the quiescent sampling technique. Prior to that, lead concentrations had been detected in MW-1 though MW-5 at levels well above the FPDWS. Lead concentrations in groundwater exceeded the FPDWS in four of five temporary wells installed during preliminary site screening. Further assessment, both horizontally and vertically, for lead contamination of groundwater is required.
- (4) A water table monitoring well should be installed approximately 60 feet southeast of the southeast corner of the parking lot. The monitoring well should be located in the approximate location where free product or a petroleum sheen was observed during Phase I IR fieldwork.

## MEMORANDUM

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(8) Pursuant to the newly revised Chapter 62-770, F.A.C., for a site to qualify for Monitoring of Natural Attenuation, available data must show that the mass of contamination is decreasing, that contamination is not migrating vertically and that background levels or applicable target cleanup levels will not be exceeded at a temporary point of compliance. These criteria should demonstrate that the site is anticipated to achieve the applicable No Further Action criteria in Section 62-770.680, F.A.C., as a result of natural attenuation in five years or less. If these criteria are not met, the cost-effectiveness of natural attenuation may be demonstrated in accordance with Rule 62-770.690(1)(f).

(9) The report has not been signed and sealed by either a Professional Geologist or Professional Engineer.