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ELECTRONIC LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION REGARDING REVIEW OF SOIL AND GROUNDWATER
SAMPLING SITES 8 AND 24 AND SAMPLING AND ANALYSIS PLAN PRESENTATION
OPERABLE UNIT 13 NAS PENSACOLA FL
2/7/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

OFFICIAL CORRESPONDENCE - This electronic message is sent in lieu of regular mail

From: Tracie L. Vaught

Tracie L. Vaught

Date: February 7, 2003

To: Mr. Bill Hill

Site or Documents:

- Evaluation of Site Conditions Based on Results of Soil and Groundwater Sampling, Operable Unit 13, Sites 8 and 24, and a
- Power point presentation entitled Sampling and Analysis Plan, OU-13, NAS Pensacola.

Facility: NAS Pensacola, Pensacola Florida

Document Date: October 30, 2002

Receipt Date of Document: Received October 31, 2003, discussed this document during November 7, 2002 partnering meeting. At that time I was told that I would receive a revised workplan. I received updates to this document during partnering meeting which took place on January 13, 2003, the updates were outlined in a power point presentation.

My comments on the subject documents are as follows (these comments apply to both Site 8 and Site 24):

1. In the text historical soil samples are discussed; where are these samples located? Please show this in the next technical memorandum or report on these sites.

2. A Remedial Goal (RG) is not 3xSCTL, which is what was used in the workplans for Sites 8 and 24 dated October 30, 2002. As I stated during the partnering meeting on November 7, 2003, the RG that is listed in both of the workplans needs to be defined. The RG is synonymous with Cleanup Target Levels for either soil or groundwater, otherwise known as the Soil Cleanup Target Levels (SCTLs) or Groundwater Cleanup Target Levels (GCTLs).
3. The proposed SPLP samples should not be composited. When the sample is composited it does not provide the specific SPLP information for the specific depth of the contamination in place. For example, for Soil boring 08S03, instead of taking the 3 SPLP samples at 0-1, 5-7 and 9-11 feet below land surface (bls) and running them as a composite SPLP, still collect the different samples and run the most contaminated sample first if logistically possible based on holding times. If the first sample fails the SPLP analysis than have the lab run the next sample and so on. This will minimize the amount of subsurface soil that will require remediation, excavation or land use controls. Apply this approach to all SPLP sampling at these sites.
4. I need to see the surface soil data and calculations provided for anything related to using the 95% UCL prior to approving this approach.
5. The monitoring wells proposed in the power point presentation presented in January 13, 2003 will be adequate.