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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING REVIEW OF WORK PLAN ADDENDUM NUMBER 6 FOR
GROUNDWATER AND SOIL SAMPLING SITES 8 AND 24 NAS PENSACOLA FL

5/9/2003

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

May 9, 2003

Mr. Bill Hill
Code ES311
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

**RE: Work Plan Addendum No. 05 Soil and Groundwater Sampling
at Operable Unit 13, Sites 8 and 24, Naval Air Station
Pensacola**

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated April 2003 (received April 16, 2003). The Department has the following comments:

- 1. Page 3-2, paragraph 3:** This paragraph states "*It was determined arsenic is naturally occurring in the area and will not be sampled.*" What rationale is being used to determine that arsenic is naturally occurring at the site?
- 2. Figure 3-1:** Soil samples 08S10 and 08S12 have "NE" listed for 0-1 feet below land surface (bls) for Dieldrin. Is it below 0.210 mg/kg, which is described in number 3 in the notes section at the top of this figure, or 0.004 mg/kg which is number 4? Until the leaching samples results are in for Dieldrin, 0.004 mg/kg needs to be used as the main driver for surface soil cleanup at the site, Since the leaching criteria of 0.004 mg/kg is less than the residential SCTL of 0.07 mg/kg. This is because leaching takes place in the entire soil column if the soil is left in place. This topic needs to be further discussed when the SPLP sampling results for Dieldrin are available for review.

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Mr. Bill Hill

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3. **Appendix A:** I will need to see the actual surface soil concentrations for all sample locations shown in Figure 1 in this Appendix for each constituent that the team wants to use the 95% UCL approach for. The figure will also need to be updated with all of the surface soil sample locations taken. I noticed some missing sample points for site 8.

If I can be of any further assistance with this matter, please contact me at (850) 245-8998.

Sincerely,

Tracie L. Vaught
Remedial Project Manager

enclosures

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

TJB _____

JJC _____

ESN _____