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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING TECHNICAL REVIEW OF WORK PLAN ADDENDUM NUMBER 5
FOR SOIL AND GROUNDWATER SAMPLING SITES 8 AND 24 REVISION NUMBER 1 NAS
PENSACOLA FL
10/13/2003
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

October 13, 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, Revision No. 1,
Naval Air Station Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated June 18, 2003 (received June 20, 2003). Even though the work recommended in this workplan has already been completed, comments are provided for the assessment report to be produced for these sites. 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? This comment remains from previous comments from the Department made in the May 9, 2003 response to comment letter. Please correct the sentence or findings in the assessment report that provides the results from this workplan.
2. **Page 1-7, paragraph 4:** This paragraph states, *"Of the eight initial samples collected and analyzed for cadmium and the nine initial samples collected and analyzed for dieldrin, no samples exceeded the remediation cleanup goals."* Soil boring 08S03 has an exceedence above the Remedial Goal of 0.21 mg/kg listed in Table 1-1 at both 0-1' below land surface (bls) with a dieldrin concentration of 2.01 mg/kg and 5-7' ft bls with a

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dieldrin concentration of 0.496 mg/kg. The information listed for cadmium should be sufficient. Please correct the sentence or findings in the assessment report that provides the results from this workplan.

3. **Table 3-2:** Soil samples from 0-1' bls should be sampled for both SPLP and regular soil analysis for sample locations 08S01 and 24S10 because these are surface soil samples. This will provide the team with the contamination present in the soil for both contaminants of concern at each boring as well as the SPLP information. However, because both of these samples exceed 3xSCTL which defines areas that need to be excavated when using the 95%UCL remedial approach, it would be a good idea to take samples for laboratory analysis to determine how much soil will need to be excavated. No need to show this change in another workplan, just present the results in the assessment report for this site.

Since these comments are being submitted after the proposed field work has already been completed. This comment can be addressed after the Department reviews the next report.

4. **Appendix A:** 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. Please correct the sentence or findings in the assessment report that provide the results from this workplan.

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
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TJB



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