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U S NAVY RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS TO MONITORING ONLY PLAN FOR CONTAMINATION ASSESSMENT  
REPORT ADDENDUM SITE 2662W NAS PENSACOLA FL  
10/27/1995  
ABB ENVIRONMENTAL SERVICES, INC



October 27, 1995

Document No. 7527.106

Mr. Eric Nuzie  
Federal Facilities Coordinator  
Bureau of Waste Cleanup  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399

**SUBJECT:** Response to FDEP Comments dated September 21, 1995 and Submittal of the Monitoring Only Plan Recommendation for the Contamination Assessment Report Addendum for Site 2662W  
Naval Aviation Depot (NADEP)  
Naval Air Station, Pensacola, Florida.  
Contract No. N62467-89-D-0317, CTO No. 008.

Dear Mr. Nuzie:

Pursuant to our phone conversation with John Mitchell on October 19, 1995, ABB-ES is submitting this response to the Site 2662W CAR Addendum comments dated September 21, 1995. The following is our current approach to the monitoring only plan (MOP) after speaking with the construction personnel at NAS Pensacola.

At the present time the area we need to access is covered by a huge concrete rubble pile and a crushed concrete rubble pile. The concrete is stored in one pile while waiting to be crushed and the crushed pile is stored nearby for reuse in road building and other construction work. Construction is scheduled for completion by November 6, 1996. I spoke with Frosty White (Environmental Coordinator) of George Hyman Construction who provided me with this information. She was reasonably sure that access to the Site 2662W area would not be available for about six months. I informed her that I would periodically check back with her to assess the progress of the project and to reassess when we may be able to work in the Site 2662W area.

The soonest we might gain access is May 1996 and there is no guarantee that we will be able to access the area before November 6, 1996 (the scheduled completion date). As with construction projects, the possibility exist that delays could extend the scheduled finish date. With these items in mind ABB-ES recommends that the start of the MOP be delayed until the completion of construction. This recommendation is consistent with the Contamination Assessment Report (CAR).

Several questions remain: 1) can the CAR Addendum be approved "as-is" with the MOP recommendation? 2) If we considered the area near temporary well TW-11 as an additional source area could the CAR for Site 2662W be approved? If so, the area surrounding well TW-11 would be assessed as a new site.

ABB Environmental Services Inc.

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In the past the Navy has requested that ABB-ES submit the MOP as a separate document from the CAR. Because of this request the number of wells and sampling parameters, in addition to their location, was not provided in the CAR Addendum dated May 1995. As an attachment to this document (Attachment A) we have provided the "MOP Implementation". This attachment provides the number of proposed wells, their locations, and the parameters for laboratory analysis. This attachment can be converted into a more formal MOP document if needed.

Earlier in 1995 ABB-ES abandoned all temporary wells and permanent wells that were still accessible by filling them with grout. Several wells along the northwestern and northern boundaries of the site were buried under concrete rubble and were inaccessible. Of the 25 wells listed in the CAR Addendum dated May 1995, 13 wells were believed to be destroyed. The remaining 12 wells were abandoned.

Please call me or otherwise correspond at your earliest convenience with your thoughts on our recommendations. Both Jim or I can be reached at (904)-656-1293.

Sincerely,

ABB ENVIRONMENTAL SERVICES, INC.

Mark Diblin, P.G.  
Senior Task Order Manager

Jim Williams, P.G.  
Technical Director

cc: Jim Williams, P.G., ABB-ES  
Byas Glover, EIC, SouthDiv  
Dean Spencer, NADEP  
John Mitchell, RPM, FDEP  
File



MONITORING ONLY PLAN (MOP) IMPLEMENTATION

The MOP will require the following actions.

- The installation of thirteen monitoring wells in the vicinity of former permanent and temporary monitoring wells MW-2, MW-15, MW-51, TW-3, TW-4, TW-9, TW-10, TW-11, TW-12, TW-13, TW-16, TW-17, and TW-18 to replace those wells destroyed during site construction activities or abandoned (see Figure 4-1). The wells will be constructed of 2-inch inside diameter schedule 40 polyvinyl chloride (PVC) casing with flush-threaded joints and 10 feet of 0.010-inch machine-slotted screen.
- Quarterly groundwater sampling of the new monitoring wells will occur for a period of 1 year. Groundwater samples will be collected in accordance with an FDEP-approved Quality Assurance Plan (QAP). Samples will be shipped to an FDEP-approved analytical laboratory. All groundwater samples collected will be analyzed by U. S. Environmental Protection Agency (USEPA) methods: 602 for BTEX, 418.1 for TRPH, 239.2 for lead, and 200.7 for chromium. If chromium and lead concentrations are shown to be near or below method detection limits in the first quarter sample analytical results, then subsequent samples will not be analyzed for chromium and lead.
- Depth to groundwater from the top of the casing will be measured in each new monitoring well on a quarterly basis. Depth to groundwater will be measured using an electronic water-level indicator and an engineering tape with divisions in increments of 0.01 foot. Groundwater level elevations will be calculated by subtracting the measured depth to groundwater from the elevation at the top of the well casing. Top of casing (TOC) elevations will be measured by ABB-ES personnel conducting a TOC elevation survey using a level and rod. A groundwater flow direction map will be prepared using groundwater elevation data.
- Quarterly analytical results will be submitted in a written report to FDEP within 60 days of sample collection. In addition, three copies of the report will be submitted to



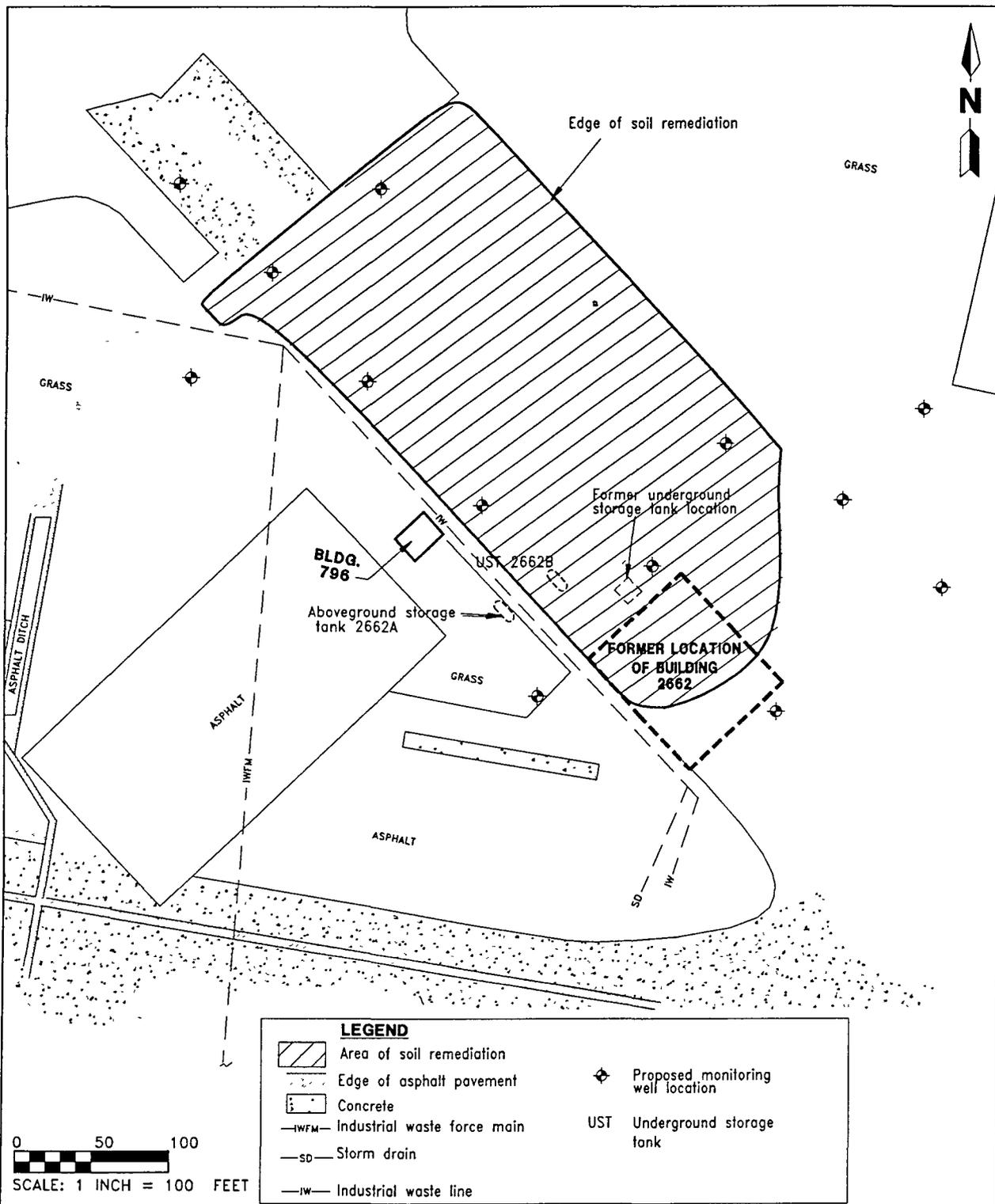
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SOUTHNAVFACENGCOC and two copies of the report will be submitted to the Public Works Department at NADEP Pensacola. Each quarterly report will include:

- 1) a brief review of site background information and site conditions;
- 2) a site location map showing the locations of the new monitoring wells;
- 3) a groundwater contamination map illustrating laboratory analytical results;
- 4) a table showing top-of-casing elevations, depth to groundwater, and groundwater elevations for the new monitoring wells; and
- 5) a groundwater flow direction map using groundwater elevations from the new monitoring wells.

- The quarterly reports will include a summary of all previous groundwater analytical data for the site.

If, at the end of the monitoring period, total BTEX and TRPH concentrations are not less than the State target levels of 50 ppb and 5 ppm, respectively, then additional monitoring, supplemental assessment, and/or remediation may be required.



**FIGURE 4-1  
PROPOSED MONITORING WELL  
LOCATION MAP**



**MONITORING ONLY PLAN**

**SITE 2662W  
NADEP PENSACOLA  
PENSACOLA, FLORIDA**