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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING ABBREVIATED REMEDIAL ACTION WORK PLAN AND DRAFT
REMEDIAL ACTION WORK PLAN OPERABLE UNIT 18 (OU18) SITE 43 NAS PENSACOLA

FL

9/18/2012

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

September 18, 2012

Ms. Patty Marajh-Whittemore
Remedial Project Manager
ITP Gulf Coast
Naval Facilities Engineering Command Southeast
Attn: AJAX Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Abbreviated Remedial Action Work Plan and Draft Remedial Action Work Plan,
Operable Unit 18, Site 43, Naval Air Station Pensacola, Pensacola, Florida.

Dear Patty:

I have reviewed the Abbreviated Remedial Action Work Plan for OU 18, Site 43, Naval Air Station (NAS) Pensacola, received by e-mail on September 13, 2012. I agree that the Navy and AGVIQ-CH2M Hill can proceed with the work proposed in the Abbreviated Remedial Action Work Plan. The work mainly consists of utility locates, UXO avoidance, and surveying preliminary excavation boundary confirmatory sample locations.

I have also reviewed the Draft Remedial Action Work Plan for OU 18, Site 43, NAS Pensacola, dated August 2012 (received by e-mail on August 24, 2012), prepared and submitted by AGVIQ-CH2M Hill Constructors, Inc. Joint Venture III. I have the following comments:

- (1) On page 2-4, in Section 2.2.2, it says groundwater was encountered between 13 and 124 feet below ground surface. I believe it was meant to say between 13 and 14 feet below ground surface.
- (2) On page 3-6, first solid circular bullet, change the word "no" to "not".
- (3) On page 3-11, it says 4 monitoring wells will be installed. It also points to Figure 3-5 as depicting the locations of the monitoring wells to be installed. The text

and this figure would suggest that monitoring well -13S is to be reinstalled. This contradicts the UFP-SAP for the Remedial Action at OU 18, Site 43, previously reviewed and commented on, which says only 3 monitoring wells are to be installed and does not mention well -13S being reinstalled. Also, if monitoring well -13S is to be reinstalled because it is inside excavation A8, that would mean that the current well -13S would need to be properly abandoned per the requirements of the Northwest Florida Water Management District. If it is proposed that well -13S is to be saved, please make sure that the excavation activities do not compromise the well so that it provides faulty water quality data from groundwater samples collected from the well. If the well is compromised, a new well will be required.

- (4) On page 3-13, top paragraph, it says monitoring well details for 8 proposed wells are in Table 3-1. However, Table 3-1 has information on only the four wells briefly discussed in comment (3) above.
- (5) On page 5-13, Section 5.4.5, Initial Phase, UXOQCS is misspelled.
- (6) On page 6-6, Section 6.5, please change the word "near" to "nearby".
- (7) On page 7-1, Section 7.1.1, please change the word "manor" to "manner".

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Greg Campbell, NAS Pensacola
Gerald Walker, Tetra Tech NUS, Tallahassee
Sam Naik, CH2M Hill, Atlanta
Tim Woolheater, EPA Region 4, Atlanta

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