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RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON FINAL SITE ASSESSMENT REPORT BUILDINGS 2269 AND 2270 NAVAL HOSPITAL NAS PENSACOLA FL

11/29/2011

AEROSTAR ENVIRONMENTAL SERVICES, INC.

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November 29, 2011

Re: Aerostar Response to FDEP Comments
Documents Reviewed: Final SAR Naval Hospital Pensacola
Facility ID# 17/9700031
Document Date: July, 2011
Reviewed By: David Grabka, FDEP
Comments Received: October 14, 2011
Response By: Curtis Mills, Aerostar

Mr. Latham and Mr. Campbell,

Below are AEROSTAR's responses to the FDEP's comments regarding the Final SAR for Naval Hospital Pensacola.

Comments

1. I concur with the conclusion that the polynuclear aromatic hydrocarbon contamination detected in the soils by Building 2269 is a result from the historically use of that area as a skeet range and is not the result of a petroleum discharge. Therefore, the department concurs that the further assessment and remediation of the site should be conducted under the Navy's Munitions Response Program as the Corry Station Skeet Range.
Comment Noted.

2. Concerning Building 2270, AEROSTAR's recommendation to collect soil samples for laboratory analysis by Total Recoverable Petroleum Hydrocarbons (TRPH) Speciation is a good one and should be conducted. It may also be advisable to conduct SPLP extraction on soil samples as well.
Comment Noted: Aerostar will collect two soil samples at 8' below land surface (BLS) in the areas of DW-1 and MW-4. The soil samples will be submitted for TRPH Speciation and Synthetic Precipitation Leaching Procedure (SPLP) analysis.

3. Concerning Building 2270, I could find no laboratory analytical data within the report that would corroborate the statement on page 21 that "...there are currently at least two feet of non-impacted soil between land surface and the impacted soil, therefore engineering controls may already be in place." In order to demonstrate this with actual physical data, surface soil samples should be collected in the vicinity of the diesel aboveground storage tanks (ASTs) and analyzed for petroleum products' contaminants of concern.
Comment Noted: To confirm that there is at least two feet of non-impacted soil between the land surface and impacted soil, AEROSTAR will collect four confirmatory soil samples. Composite soil samples from ground surface to 2' BLS will be collected east and north of the diesel ASTs and submitted for

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analysis of benzene, toluene, ethylbenzene, total xylense, and methyl tert-butyl ether (BTEX/MTBE), polynuclear aromatic hydrocarbons (PAHs), and TRPH.

4. Most all of the soil and groundwater sampling locations are to the north and east of the diesel ASTs at Building 2270. With groundwater flowing to the south as depicted in Figures 12 and 13, there needs to be a well installed directly south of the ASTs. Soil samples should be collected during well installation.
Comment Noted: AEROSTAR will install one shallow permanent monitoring well south of the diesel ASTs top a depth of approximately 15' BLS. Due to underground utilities directly south of the ASTs, the monitoring well may have to be installed in the roadway. During well installation, soil samples will be collected at one foot intervals and screened with an OVA-FID. One soil samples will be submitted for laboratory analysis of BTEX/MTBE, PAH, and TRPH. A groundwater sample will be collected from the newly installed well and analyzed for volatile organic hydrocarbons (VOHs), PAHs, TRPH, and Lead.

5. Another round of groundwater sampling and analysis should be conducted on wells MW-1, MW-4, and MW-5 to verify that the concentrations of ethylbenzene, total xylenes, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, and TRPH detected in those wells from May 12, 2011 sampling event remain below the Department's groundwater cleanup target levels. This groundwater sampling should be conducted in conjunction with the sampling of the well mentioned in comment (4) above.
Comment Noted: AEROSTAR will collect confirmatory groundwater samples from monitoring wells MW-1, MW-4, and MW5 for analysis of VOHs, PAHs, TRPH, and Lead.

6. Please note that the May 12, 2011 groundwater elevation for MW-7 should be 91.46 feet in Table 8 and Figure 12.
Comment Noted: Table 8 and Figure 12 will be revised to reflect accurate groundwater elevation.

If you have any questions or require additional information, please feel free to contact me at (251) 432-2664 or cmills@aerostar.net.

Curtis R. Mills
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