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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON DRAFT SITE ASSESSMENT REPORT ADDENDUM FOR
UNDERGROUND STORAGE TANK SITE 02 BUILDING 2662 NAS PENSACOLA FL
06/27/2011
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

June 27, 2011

Ms. Patty Marajh-Whittemore
Naval Facilities Engineering Command Southeast
IPT, Gulf Coast
Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Site Assessment Report Addendum for Underground Storage Tank Site 02
(Building 2662), Naval Air Station Pensacola, Pensacola, Florida.

Dear Patty:

The Department has reviewed the Draft Site Assessment Report Addendum (SARA) for Underground Storage Tank Site 02 (Building 2662), Naval Air Station Pensacola, dated December 2010 (received December 23, 2010), prepared and submitted by Tetra Tech NUS, Inc. The Department cannot concur at this time with the recommendation of No Further Action for the site. The Department has the following comments on the report and recommendations for further assessment work to be conducted to attempt to document the site has been remediated:

- (1) Appendix A contains a greatly appended version of the April 1994 Contamination Assessment Report (CAR). In Table 5-3, OVA readings are presented for 95 soil borings. Tables 5-4 through 5-6 present soil laboratory analytical data for three soil boring samples, one duplicate sample, and a sample from a trench. Between this data and data collected by Bechtel during soil excavation, thermal treatment of the soil, and post-treatment soil analysis, the Department hopes that a figure or figures showing the area that was excavated and where samples were collected and OVA and analytical data tables can be compiled that conclusively show that soil contamination at the site has been adequately remediated and meets the current regulatory requirements for RMO I for soils. If sufficient data has not been collected to show this, or if there is an indication that contaminated soil still exists on the site, the Department expects the Navy to address it in accordance with the current Petroleum Cleanup Rule, Chapter 62-770, Florida Administrative Code.

- (2) Between the April 1994 CAR and the December 1996 Second CAR Addendum, contaminants detected in groundwater above their current groundwater cleanup target levels included benzene, naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, TRPH and lead. TRPH concentrations reported in the December 1996 Second CAR Addendum would indicate that the detections above GCTLs in the April 1994 CAR were no longer of concern. The lead concentrations reported in the December 2010 SAR Addendum would indicate that lead is no longer of concern. Analysis of the other contaminants has not been done lately because the last time they were analyzed, they were detected at concentrations less than the cleanup numbers in effect at the time they were reported. Because the site was not closed earlier when the aforementioned cleanup number were in effect, the current cleanup numbers are required to be met. Please identify a list of monitoring wells to be sampled for analysis for volatiles and semi-volatiles per Chapter 62-770, F.A.C.
- (3) The very high pH values depicted in Table 2-2 need to be explained or otherwise addressed through remediation. Currently, the best hypothesis is that grout was introduced into several wells at the time of installation and/or development. Please investigate to determine whether the surficial aquifer has been impacted so that it is highly alkaline.
- (4) I have the following editorial changes to be made to the Draft SARA:
 - a. On page 1-5, second bullet, first sentence, please change fluorine to fluorene.
 - b. On page 1-5, second paragraph after the bullets, please change Bechetel to Bechtel.
 - c. On page 3-1, Section 3.1, first paragraph, the Florida MCL for lead is defined as a treatability standard under Chapter 62-550, F.A.C. Please correct this to state the Florida MCL for lead is a human health standard.
 - d. On page 4-1, Section 4.1, last paragraph, same comment as c. above.
- (5) Please note that the well numbers do not correlate between the December 2010 SARA (figure 2-1) and the December 1996 CARA (figure 3-5).

<u>SARA</u>	<u>CARA</u>
2662MW01	MW-2
2262MW02	MW-3
2262MW03	MW-4
2262MW04	MW-5
2262MW05	MW-6

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2262MW06	MW-15
<u>SARA</u>	<u>CARA</u>
2262MW07	MW-14
2662MW08	MW-13
2262MW09	MW-11
2262MW10	MW-10
2262MW11	MW-8
2262MW12	MW-7
2262MW13	MW-12
2262MW14	MW-9
2262MW15	MW-16

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: Gerald Walker, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola
Sam Naik, CH2M Hill, Atlanta

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by
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