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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW OF SITE ASSESSMENT REPORT ADDENDUM III FOR UNDERGROUND
STORAGE TANK SITE 22 INSTALLATION RESTORATION SITE 21 NAS PENSACOLA FL
11/29/2010
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
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127 *Rec'd 12/1/10*

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

November 29, 2010

Ms. Patty Marajh-Whittemore
Naval Facilities Engineering Command Southeast
Post Office Box 30
Building 903
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Site Assessment Report Addendum III for Underground Storage Tank Site 22 (IR Site 21), Naval Air Station Pensacola, Pensacola, Florida.

Dear Ms. Marajh-Whittemore:

I have completed my review of the Site Assessment Report Addendum III for Underground Storage Tank Site 22 (IR Site 21), Naval Air Station Pensacola, dated January 2010 (received January 22, 2010), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Site Assessment Report Addendum III:

- (1) On Figure 1-3, there are nine former aboveground storage tanks depicted with dashed circles. The figure also depicts monitoring well locations. One of the tanks depicted has no monitoring well associated with it. Was this tank assessed for possible contamination?
- (2) On Figure 2-3, there are two monitoring wells MW39 depicted. The most eastern well should be MW43.
- (3) In Figures 4-4 and 4-5, lead and TRPH were detected in wells or DPT points closest to Pensacola Bay at concentrations that exceed their surface water cleanup target levels. Those wells and DPT points are MW64, MW65, MW69, MW74, DP32 and DP04. This indicates that further delineation is required to determine whether those contaminants may be discharging to Pensacola Bay. If it is determined that contaminants are discharging to Pensacola Bay above their surface water cleanup target levels, groundwater monitoring as the remedial alternative would not be acceptable to the Department.
- (4) In Figure 4-4, the legend at the top left of the figure has an incorrect GCTL for 1-methylnaphthalene. It should be 28 $\mu\text{g}/\text{L}$. Also, the GCTL for total xylenes should be depicted in the legend.

- (5) On Table 4-1, the table indicates that groundwater samples were analyzed for three PAHs, but not for the rest as these are listed as NA. This seems to be an error.
- (6) In the conclusions and recommendations of the report in Section 5.3, it is recommended that a RAP be prepared to address TRPH contamination in soil and groundwater and that monitoring only is recommended for inorganic contaminants in groundwater. I cannot concur with these recommendations at this time based on the information provided in the report. First, lead contamination in groundwater would appear to extend to the seawall/shoreline based on the information provided in Figures 4-4 and 4-5 (see comment #3 above). Also, the TRPH plume has not been completely delineated in the downgradient southerly direction or sidegradient to the plume, mainly in the westerly direction. Also, much of the data collected for this SAR Addendum III was collected in May 2007, with supplemental sampling having occurred in January 2009. This data can be considered too old to make final remedy decisions. I would propose the following in another round of site assessment: (1) an inventory of all the wells that currently exist on the site, (2) a conceptual site model be prepared to depict the probable contaminant distribution based on all the data previously collected, the predicted direction the groundwater plumes would migrate based on advection, and potential discharge points of contamination to Pensacola Bay, (3) the installation of monitoring wells to completely delineate the plumes in all directions, both horizontally and vertically, and to test the conceptual site model as far as potential discharge points to Pensacola Bay, and (4) the sampling and analysis of monitoring wells that would provide current information on source level concentrations, current information on compliance wells around the plumes, for determining whether contaminants are actually discharging or potentially discharging to Pensacola Bay and validating the conceptual site model.

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

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November 29, 2010
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CC: Gerald Walker, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola

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