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NAS SAUFLEY FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS OF DRAFT FINAL SITE ASSESSMENT REPORT FOR SITE 1
REVISION 1 NAS SAUFLEY FIELD FL
01/28/2015
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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January 28, 2015

Mr. John Schoolfield
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: Draft Final Site Assessment Report for Saufley Field Site 1, Revision 2, Saufley Field,
Pensacola, Florida.

Dear John:

I have completed my review of Draft Final Site Assessment Report for Saufley Field Site 1, Revision 2, Saufley Field, dated October 2014 (received October 27, 2014), prepared and submitted by Tetra Tech, Inc. I have the following comments on the report:

- (1) In the Executive Summary, page ES-2, last sentence on bottom of page extending to top of page ES-3, it states that "Arsenic was also detected in subsurface soil samples that exceed Residential and Industrial Direct Exposure SCTLs, but were at depths that these SCTLs would not be applicable for the exposure scenarios." This sentence should be clarified to more accurately state why the Department's direct exposure SCTLs are not applicable to the arsenic detected in subsurface soil samples.
- (2) On page ES-3, third paragraph, same comment as (1) above.
- (3) In Section 1.8, page 1-7, it discusses the Saufley C & D Landfill and Site 4, but does not provide a context for why those sites are relevant to Site 1. Please provide a little background on the two sites and their relationship to Site 1 with regard to their location, proximity, and scope of investigations. This section should also discuss why environmental data from those sites is relevant or comparable to the data collected during the Site 1 site assessment. Site 2 at Saufley Field should also be discussed in this section as environmental data from the investigation of Site 2 is used in comparison to the data from Site 1. Please provide a figure depicting the locations of Saufley Field Sites 1, 2 and 4 and the Saufley C & D Landfill.

- (4) On page 3-2, third paragraph, first sentence, please insert the word “were” between “Groundwater Samples” and “collected”.
- (5) In Section 3.5 on page 3-6, first paragraph, first sentence, please remove the part where it says that the sampling methodology was compliant with Florida’s Risk Assessment Rule Chapter 62-780.650, F.A.C. It is already stated earlier in the sentence that sampling was conducted in accordance with FDEP’s SOP FS 3000.
- (6) On page 3-12, in Table 3-3, the well screen interval of well SF-1-MW02 is inconsistent with the total depth of the well specified in the third paragraph of page 3-12 and in Table 3-3. Please check the information on the well’s construction and correct.
- (7) On page 3-13, Table 3-4, it says Site 2 instead of Site 1. Please correct this.
- (8) In Section 3.7, page 3-13, second paragraph, second sentence, it says that a low-flow, low-stress purge rate was achieved by adjusting the pump speed to match the draw-down in the well. I believe the word “match” should be replaced with “minimize”.
- (9) On page 4-29, in the first sentence after the lithology table, please make sure the description of the lithology in the 14-15 feet below land surface interval matches what is described in that lithology table.
- (10) On page 4-30, third paragraph, first sentence, please replace the word “and” with “its”.
- (11) On page 4-35, Table 4-8, please remove the reference to Site 2.
- (12) On page 5-1, Section 5.1.2, second paragraph, the second and third sentence are identical. Please delete one.
- (13) On page 5-1, Section 5.1.2, third paragraph, first sentence, please insert the word “on” between the words “based” and “the”.
- (14) Section 4.5, Background Soil Sample Results, discusses the results of the background investigation at soil borings SB15 and SB16. Their locations are depicted in Figure 3-2. Please add these sampling points and arsenic soil concentrations to Figure 4-2.
- (15) Section 4 has a separate section discussing background soil concentrations. There should also be a separate section discussing background groundwater concentrations.
- (16) The arguments for why iron, aluminum and manganese in groundwater should be eliminated from consideration as site contaminants at Site 1 is not clearly stated. It states

Mr. John Schoolfield
Draft Final Site Assessment Report
Site 1, Saufley Field
January 28, 2015
Page 2 of 2

in Section 4.6 that concentrations of those inorganics are within the range detected at Site 4 and background wells, but the actual concentrations are not provided for comparison. Also, Section 1.8 mentions the Saufley C & D Landfill only for the purpose of determining that the C & D landfill is not impacting Site 4 groundwater. Groundwater samples from the C & D landfill monitoring wells contained elevated aluminum, iron and manganese concentrations. I would suggest that the C & D landfill concentrations be provided and included in the discussion in Section 4 on whether concentrations of iron, aluminum and manganese are naturally elevated in groundwater.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
DoD and Brownfields Partnerships
Waste Cleanup Program

CC: Greg Campbell, NAS Pensacola
Frank Lesesne, Tetra Tech, Tallahassee

KAW

