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Governor

Department of Environmental Protection

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Virginia B. Wetherell
Secretary

September 29, 1994

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NAS PENSACOLA
5090.3a

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
~~Post Office Box 190010~~
2155 Eagle Drive
North Charleston, South Carolina 29419-9010

Dear Mr. Hill:

Department personnel have completed the technical review of the Draft Field Investigation Technical Memorandum, Sites 10 and 14, NAS Pensacola. I have enclosed a memorandum addressed to me from Mr. David M. Clowes. The concerns detailed in his memorandum need to be adequately addressed before we can consider approval of the referenced document.

If I can be of any further assistance with this matter, please contact me at 904/488-3935.

Sincerely,

Eric S. Nuzie
Eric S. Nuzie
Federal Facilities Coordinator

ESN/sg

Enclosure

cc: David Clowes
John Mitchell
Tom Moody
Ron Joyner
Allison Humphris

@

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Memorandum

Florida Department of
Environmental Protection

TO: Eric S. Nuzie, Federal Facilities Coordinator
Bureau of Waste Cleanup

THROUGH: James J. crane, P.G. Administrator
Technical Review Section *JJC*

Tim J. Bahr, P.G. Supervisor
Technical Review Section *TJB*

FROM: David M. Clowes, Remedial Project Manager
Technical Review Section *DME*

DATE: September 26, 1994

SUBJECT: Draft Field Investigation Technical Memorandum for
Sites 10 and 14, Naval Air Station Pensacola.

I have reviewed the above stated document dated April 25, 1994 (received April 26, 1994). The following comments should be addressed before this document can be considered final:

General Comments:

1. The quantitation limits used for groundwater sample analysis are above Florida Primary, Secondary and "free from" Water Quality Standards (Chapters 17-520 and 17-550, F.A.C). contract Lab Protocol (CLP) should be adjusted so the quantitation limits are at or below State standards. However, to avoid reanalyzing every sample, samples do not need to be reanalyzed if the samples were not diluted before analysis, if estimated values can be provided, and if significant soil contamination is not present. In the future, the reasoning behind sample dilution should be explained to avoid confusion and facilitate document review. As agreed in the June 27-29, 1994 meeting, screening data (predilution) will be provided and assessment phases beyond screening will use quantitation limit analyses at or below State Water Quality standards.
2. The metal concentrations in the background groundwater samples are many times above the MCLs. The location of these background wells and the relationship to known contamination sources should be identified.
3. A summary of the results from the previous investigations (E & E, 1991 and 1992) and comparison between the 1991/1992 and 1994 data sets should be included, with discussion of the reasons for the detection of TRPHs and phcnolc in soil and groundwater in 1991/1992 but not in the 1994 data.



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4. The subject document should be updated to *reflect* the July 5, 1994 Florida Soil cleanup Goals (CG), which replaces the previous version of February 14, 1994.
5. An explanation of the abbreviations used in the lab data sheets (or reference to a previous explanation if relevant) should be provided. For example, what does the abbreviation "RE" in sample 14S0310RE represent?

Specific Comments:**Site 10 (Comodore's Pond):**

1. Dieldrin was detected in soil up to 790 ppb (Without any qualifiers) in sample 10GS0101D. This result should be included in the text and tables. Dieldrin at 790 ppb is substantially above the CG of 71.2 ppb (aggregate resident exposure scenario). Thus, subsequent soil sampling in this area is necessary to delineate the extent of contamination.
2. Due to the dieldrin soil contamination and possible groundwater contamination (0.110 ppb, flagged "UJ"), monitoring wells 10GS01 and 10GS02 should be resampled. The quantitation level employed should be equal to or lower than the State ARAR of 0.1 ppb (See General Comment No. 1). Note, if dieldrin is present in groundwater, then the leachability scenario soil CG is 0.36 ppb, which would supersede the exposure scenario soil CG of 71.2 ppb, requiring additional soil sampling over the whole sites.
3. The location of adjacent sites/contamination sources should always be illustrated on all relevant figures. Thus, Site 23 and the approximate location of the buried drums should be included on Figure 2.

Site 14 (Dredge Spoil Fill area):

1. The lead concentration in soil sample 148305 of 28,600 ppm ("J" flagged) should be confirmed, since the level detected is substantially above the other neighboring samples.
2. Surface soil samples should be collected from all locations.. For example, at location 14S03 the shallowest sample was collected at five foot (sample 148305).
3. Since the results from the dredge spoil samples are not homogenous with respect to metals and organics, a minimum of two additional soil borings should be collected from each



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basin. Recommended Locations are in the center and southern end of each basin.

4. If the analysis of soil samples contain significant levels of metals above soil CGs (such as at 14S305), then these samples should also be analyzed for TCLP.
5. Due to the elevated metal levels from 14S03, an additional monitoring well should be installed on the berm to the east of 14S03. Another reason for installing a third well is that potentiometric surface maps require a minimum of three points to determine groundwater flow.
6. In the groundwater lab data sheets, Acetone and Methylene chloride were "U", not "J" flagged. Thus, these chemicals were not detected; contrasting the statement on page 30 of their presence as lab contaminants. Additionally, if these solvents are present as lab contaminants, then why are they also not detected from Site 10 samples?
7. Groundwater samples 14G501 and 14G502, with Manganese levels of 261 ppb and 314 ppb, exceed the promulgated Florida Secondary Drinking Water Standard (17-550, F.A.C.) of 50 ppb. The text should be corrected.
8. The updated CG for Nickel, based on a child resident and Hazard Index of 1, is 1,510 ppm. Thus, none of the soil samples analyzed are above the updated Cleanup Goal. (See General Comment No. 3).
9. The updated CG for Benzo(a)pyrene, based on an aggregate resident, is 148 ppb. (See General Comment No. 3).