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## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary  
N00204.AR.000510  
NAS PENSACOLA  
5090.3a

February 26, 1993

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Ms. Linda Martin  
Code 1851  
Department of the Navy - Southern Division  
Naval Facilities Engineering Command  
Post Office Box 10068  
Charleston, South Carolina 29411-0068

Dear Ms. Martin:

Department personnel have completed the technical review of the Draft Sampling and Analysis Plan, Category 11, Site 1, 25, 27, and 39, NAS Pensacola. I have enclosed a memorandum addressed to me from Mr. Jorge R. Caspary. It documents our comments on the referenced report.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

Eric S. Nuzie  
Federal Facilities Coordinator

ESN/bb

Enclosure

cc: Jorge Caspary  
Bill Kellenberger  
Ron Joyner  
Allison Drew  
Satish Kastury  
Lynn Griffin  
John Mitchell



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# Interoffice Memorandum

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

THROUGH: Dr. James J. Crane, Technical Review Section *JJC*

FROM: Jorge R. Caspary, PGI/Base Coordinator  
Technical Review Section *JRC*

DATE: February 22, 1993

SUBJECT: Review of Draft Sampling and Analysis Plan, Category II  
Sites: 1, 25, 27, and 39. Pensacola Naval Air Station.

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The above referenced documents have been reviewed and the following comments are offered for the Navy's consideration:

### General Comment

Sites 1, 25, and 27 already have had Phase II workplans approved; however, the OU-10-based Sampling and Analysis Plan (SAP) for this category presents some changes to the the sampling methodologies previously proposed in the workplans; these changes to the sampling methodologies are addressed in the Specific Comments portion of this memo. In addition, since sites 25 and 27 belonged to the now defunct Group G, there is still an issue that needs to be resolved: in a letter issued on December 29, 1992 the Department asked the Navy to formally respond to the issue of short duration aquifer pump tests for assessment and remedial purposes. The Department approved the Phase II Workplans for Group G believing that this issue can be resolved without invoking informal Dispute Resolution; therefore, until this issue is resolved and comments presented below are adequately addressed, the documents reviewed cannot be considered final

### specific Comments

#### Sites 1, 25, 27, and 39

The Navy proposes to change the RCRA-based Appendix IX analysis requirement to the CERCLA-based "Full Scan" analysis plus the collection of additional information about soil and groundwater physical parameters necessary to prepare the upcoming Feasibility Study. Given the fact that this course of action is being implemented at other NPL listed military facilities in the State of Florida, the proposed change is acceptable.

Eric S. Nuzie  
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The Navy has changed soil sample intervals from the already approved 0.0-1.0, 1.0-2.5, 2.5-5.0, etc. feet below ground surface to continuous split-spoon sampling from ground surface to the water table (0.0-2.0, 2.0-4.0, etc. below ground surface) "to ensure a regular and consistent sampling interval". The Navy should be aware that during the July 14, 1992 RPM meeting, the Navy agreed to sample from 0.0-1.0, 1.0-2.5, etc. feet bgs. At that time, FDER and EPA presented technical reasons why the 0-1.0 and the 1.0- 2.5 feet bgs are perhaps the most important intervals in soil sampling; furthermore, FDER approved the RI/FS Workplans for groups H, I, P, and Q based on this change. In addition, page 4-11 of the approved Sampling and Analysis Plan (SAP) for Operable Unit 10 indicates that surficial (0.0-1.0 foot bgs) will be obtained. The Department encourages the Navy to clarify its final position regarding the soil sampling intervals.