



ENSAFE INC.

ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

5724 Summer Trees Drive • Memphis, Tennessee 38134 • Telephone 901-372-7962 • Facsimile 901-372-2454 • www.ensafe.com

November 16, 2001

N00204.AR.001960

NAS PENSACOLA

5090.3a

Florida Department of Environmental Protection
Attn: Joe Fugitt
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Site 38, Operable Unit 11, NAS Pensacola
Contract # N62467-89-D-0318/059

Dear Mr. Fugitt:

On behalf of the Navy, EnSafe Inc. is pleased to submit two copies of the Final Site 38 Remedial Investigation Report Addendum 2. Responses to FDEP comments are also enclosed. Comments from EPA were not received.

If you should have any questions or need any additional information regarding the document, please do not hesitate to call me.

Sincerely,

EnSafe Inc.

A handwritten signature in cursive script that reads "Allison L. Harris".

Allison L. Harris
Task Order Manager

Enclosure

cc: Charlie Goddard, FDEP - NW District without enclosure
Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
EnSafe Inc. file without enclosure
EnSafe Inc. Knoxville file without enclosure
EnSafe Inc. library without enclosure
Administrative Record

Florida Department of Environmental Protection
Response to Technical Comments
Remedial Investigation Report Addendum 2
Site 38 (Operable Unit 11)NAS Pensacola

Comment 1:

Table 2-3: The unit of measurement for conductivity should be corrected on this table.

Response:

The units will be changed.

Comment 2:

Table 3-1: Top of Casing Elevation for other (EPA) monitoring wells should be surveyed in for any future monitoring at this site.

Response:

This will be included as a task during the first post-Record of Decision monitoring period for this site.

Comment 3:

Page 4-6 and 4-7, Building 604 Volatile Organic Compounds: 3rd paragraph — It is stated that **PCE** was non-detect in downgradient monitoring wells. Monitoring well 38GS18 (14 µg/L) is apparently a downgradient well (see Page 4-11 Vinyl Chloride discussion) based on Figure 4-1. 4th paragraph — The TCE discussion also does not agree with Table 4-4 and Figure 4-1. I recommend the data be reviewed and the discussion be revised appropriately.

Response:

With regard to the PCE discussion, monitoring well 38GS18 is cited in paragraph 3 as one of the wells demonstrating an exceedance. With regard to the TCE discussion, 38GS19 is located near the southernmost portion of Building **604**. The sentence noting that downgradient monitoring wells were non-detect for PCE and TCE has been deleted from both of the discussions. No other discrepancies were noted during the review of the data.

Comment 4:

Tables 4-7, 4-11, and 4-12, and pages 4-15, 4-21, and 4-25: The SCTL should be replaced with the **GCTL** (Groundwater Cleanup Target Level) during the groundwater discussion.

Response:

Section 4 text and tables have been modified to cite groundwater cleanup target levels (**GCTLs**) as comparative groundwater criteria and surface water cleanup target levels (**SWCTLs**) as comparative surface water criteria.

Comment 5:

Tables 5-7 and Figures 5-9 through 5-17: Inspection of the data indicates that VOC concentrations are elevated in 38GS08 and 32 (650 feet and 860 feet downgradient of 38GS28). The Navy should evaluate the data to determine if VOCs are potentially moving off site.

Response:

Figure 4-1 provides a useful depiction of the situation with regard to these two wells. 386832 is in fact downgradient from 08, and the VOC concentrations clearly demonstrate significant attenuation. At 32, the only VOC above a groundwater standard is vinyl chloride, which at 2 ppb is only marginally above the 1 ppb standard. All VOCs detected in 08 above standards (PCE, TCE, VC, cis-1,2-DCE and trans-1,2-DCE) were decreased significantly in 32 (PCE by 100%, TCE by 100%, cis-1,2-DCE by 96.5%, trans-1,2-DCE by 93.5%, and vinyl chloride by 91%).

Comment 6:

Table 5-9, page 5-39: The reported concentration of cadmium is 79 µg/L in monitoring well 38GS19. I recommend that the existing data be evaluated to determine if a potential source is located in this area.

Response:

While surface soil in this area did exhibit cadmium above a leachability-based PRG of 6 mg/kg, it was not above this threshold in subsurface soil. This was reported in the Final Remedial Investigation Report (1996).

Comment 7:

The data presented in the report indicates that natural attenuation mechanisms are reducing concentrations of VOCs and some metals at the site. If monitored natural attenuation is selected as the preferred remedial alternative, I recommend that additional monitoring wells be installed downgradient from 38GS18 and 38GS32 during the remedial design phase.

Response:

Additional well installation and monitoring will be considered as part of the development of an overall monitoring program, either as part of remedial design or as remedial action.