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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON THE SOURCE REMOVAL REPORT FOR AREA OF
CONCERN 2 AT NSA PANAMA CITY FL
12/10/2008
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

December 10, 2008

Mr. John Schoolfield, P.E.
Department of the Navy
Naval Facilities Engineering Command Southeast
Building 903
Yorktown/Langley
Jacksonville, Florida 32212-0030

RE: Source Removal Report, AOC 2, Naval Support Activity Panama City, Panama City Beach, Florida (CH2M Hill Constructors, Inc., October 14, 2008)

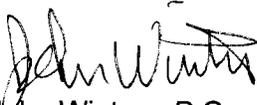
Dear Mr. Schoolfield:

I have reviewed the above document dated October 14, 2008 (received October 27, 2008). This Source Removal Report documents the activities performed by CH2M Hill Constructors, Inc. (CH2M Hill) to complete the soil and water removal to recover free product at AOC 2. I/FDEP concur with this report and all 8 conclusions presented within, except for portions of conclusion #6. Conclusion #6 states that, "Confirmation sample analytical results indicate TRPH concentrations in soil outside the excavation are below the FDEP leachability SCTL. Additional assessment may be necessary to ensure soil and groundwater concentrations meet the cleanup criteria in the area east of the fence line where the excavation did not occur." I concur that additional assessment in the utility corridor area (the area just east of the excavation) is necessary to ensure soil and groundwater concentrations meet FDEP cleanup criteria. However, I do not concur with the way the confirmatory soil sampling was conducted and with the conclusions presented in this report with respect to their analytical results. In the report it states that the confirmatory soil samples were collected anywhere from 3 to 4.5 feet below land surface (bls). The water table at this site is known to be at approximately 6 feet bls. FDEP requires soil samples be collected as close to the water table as possible. To satisfy this sampling requirement for this site, I would expect the unsaturated zone to extend to approximately 5.5 feet bls (the capillary fringe should extend approximately 6 to 10 inches above the water table) and that the soil sample should then be collected very near to this depth. The NSA Panama City Partnering Team's path forward for AOC 2 should be discussed as a Team and as soon as possible.

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Source Removal Report
Naval Support Activity Panama City, AOC 2
December 10, 2008

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager

Cc Tim Bahr, FDEP, Tallahassee

JJC JJC

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by

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