



Lawton Chiles
Governor

Department of Environmental Protection

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Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

October 20, 1994

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Mr. Bill Hill
code 1851
southern Division
Naval Facilities Engineering Command
P.O. Box 10068
'North Charleston, South Carolina 29419-9010

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NAS PENSACOLA
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RE: Rules 17-520 and 17-550, and Florida Ground Water
Guidance Concentrations, Naval Air Station Pensacola.

Dear Mr. Hill:

The Navy and its contractor Ensafe have requested additional documentation of the State's applicable or relevant and appropriate requirements (ARARs) for groundwater.

As discussed many times in meetings and documented recently in agency comments (July 12, 1994) to the Technical Memorandum for Category V Sites 9, 29, and 34, the Florida Primary, Secondary and minimum criteria or "free from" Water Quality Standards (Chapters 17-520 and 17-550, Florida Administrative Code) are ARARs because they're promulgated rules. The updated 1994 Florida Ground Water Guidance Concentrations booklet contains the Maximum Concentration Levels (MCLs) and numerical interpretations by Departmental toxicologists of the promulgated narrative minimum criteria standard. The Primary and Secondary Drinking Water Standards are established in Chapter 17-550, F.A.C. and promulgated as groundwater standards in Chapter 17-520, F.A.C. For those constituents in the booklet that do not have Primary or Secondary Drinking Water Standards, the Department considers them exceedences of minimum criteria and trigger/screening values for assessment purposes. Furthermore, the Department would consider them cleanup levels unless alternate ones are approved by the Department.

Sincerely,

David M. Clowes
Remedial Project Manager

Mr. Bill Hill
October 20, 1994
Page 2

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cc: Ron Joyner, NAS Pensacola
Allison Humphris, EPA Region IV
Tom Moody, FDEP Northwest District
Brian Caldwell, Ensaf, Pensacola
John Mitchell, FDEP Natural Resource Trustee

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