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Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 25, 1995

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NAS PENSACOLA
5090.3a

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: Draft Proposed Plan (PP), Site 39 (Oak Grove
Campground), Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject document, dated March 29, 1995 (received March 30, 1995). The following comments should be addressed before the document is considered final:

1. Section 4.0, Page 7 should be rewritten. With the inclusion of the inhalation pathway in the calculation of Remedial Goal Options (RGOs)/Cleanup Levels, FDEP utilizes $1E-6$ for carcinogenic Chemicals of Concern (COCs) and 1.0 hazard quotient for non-carcinogenic COCs as default criteria. However, if the contamination level of a Chemical of Potential Concern (COPC) is below the ARAR (MCL, PRG, etc.), then the COPC is not considered a COC, even if the RGO is exceeded. Therefore, since the level of arsenic detected in groundwater is not above the Florida Primary Standard (Chapters 62-520 and 62-550, F.A.C.), the RGO of $1.3E-4$ is not applicable.
2. Section 7.0, Page 10: My title is Remedial Project Manager (Mr. Eric Nuzie is the Federal Facilities Coordinator).

Mr. Bill Hill
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If I can be of any further assistance with this matter,
please contact me at (904) 488-3935 or (904) 921-9989.

Sincerely,



David M. Clowes, P. G.
Remedial Project Manager

/dmc

cc: Ron Joyner, NAS Pensacola
Allison Humphris, EPA Region IV
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Phil Crotwell, Bechtel, Knoxville, TN
Tom Moody, FDEP Northwest District
John Mitchell, FDEP Natural Resource Trustee

TJB TJB JJC JJC ESN ESN