



Lawton Chiles  
Governor

# Department of Environmental Protection

32501.039  
09.01.39.0022

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

Virginia B. Wetherell  
Secretary

April 25, 1995

N00204.AR.000907  
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 Record of Decision (ROD), Site 39 (Oak Grove  
Campground), Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject document, dated March 30, 1995 (received March 31, 1995). The following comment should be addressed before the document is considered final:

Section 7.0, Human Health Risk Assessment: 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.

Mr. Bill Hill  
April 25, 1995  
Page 2

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 T JJC JJC ESN ESN