



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

N00204.AR.000988

NAS PENSACOLA

5090.3a

September 13, 1995

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

RE: Technical Memorandum, Revised FS Memoranda Format: OU 10 FS  
Options, NAS Pensacola,

Dear Mr. Hill:

I have completed the review of the above referenced technical memorandum dated August 31, 1995 (received September 1, 1995), and provide the following comments. Also, further comments from Greg Brown are included in the attached memorandum.

1. The Florida FDEP Soil Cleanup Goals for Military Sites should be considered ARARs and not TBCs. These values should be the RAOs for soil, unless site specific values are determined using the formula accepted by the Department.
2. The Preliminary Remediation Goals (PRG) in soil for Benzo(a)pyrene and Dibenz(a,h)anthracene in Table 1 should meet the FDEP Soil Cleanup Goals for Military Sites of 140  $\mu\text{g}/\text{kg}$  (residential) or 500  $\mu\text{g}/\text{kg}$  (industrial).
3. In Table 4, I have no problem with Capping as a technology or alternative, but I do have concerns of using asphalt as the cap. An asphalt cap would increase the likelihood of the site being accessed by vehicles and heavy equipment. This usage would create the likelihood of cap failure. Also, the use of this area will likely change due to the closure of the IWTP.
4. Under the Section Assembly of Alternatives, Alternative III should be titled Offsite Landfilling rather than Excavation. Excavation is a technology incorporated in an alternative such as offsite landfilling or offsite incineration.

Also, I do not believe offsite incineration of soil should be excluded as an alternative. This alternative is

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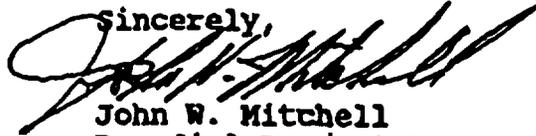
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currently being proposed for the NADEP realignment area for treatment of contaminated soils.

Should you have any questions. please contact me at (904) 921-9989.

Sincerely,



John W. Mitchell  
Remedial Project Manager

cc: Jay Bassett, EPA Region IV  
Henry Beiro/Brian Caldwell, Ensafe, Pensacola  
Steve Cowan, Bechtel, Knoxville, TN  
Tom Moody, FDEP Northwest District  
Pat Kingcade, FDEP Office of General Counsel

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Florida Department of  
**Environmental Protection**

**Memorandum**

TO: John Mitchell, Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section <sup>B</sup>

FROM: Greg Brown, P.E., Professional Engineer 11, <sup>AB</sup>  
Technical Review Section

DATE: September 12, 1995

SUBJECT: Technical Memorandum; Revised FS Memoranda Format;  
OU 10 FS; NAS Pensacola, Florida

I reviewed the subject document dated August 31, 1995 (received September 1, 1995). The format and content of the Technical Memorandum are acceptable and consistent with earlier discussions. I do have the following minor comments, however.

1. ARARs are legal threshold requirements that generally take precedence over guidance or site-specific risk-based cleanup goals. If ARAR attainment is not desirable or feasible, waivers are required as described in Section 121(d)(4) of CERCLA.
2. Comparison of site concentrations with ambient background concentrations for arsenic in soil and sediments should be presented in the RI and BRA to support screening it out as a COC.
3. Mr. David Clowes, P.G., communicated the regulatory status of the State of Florida's Ground Water Guidance Concentrations in his memorandum dated October 5, 1994, "Rules 17-550 and Florida Ground Water Guidance Concentrations, Naval Air Station Pensacola". Based on Mr. Clowes' accurate explication, Florida Ground Water Guidance Concentrations should be considered ARARs and not TBCs as presented in the memorandum.
4. The proposal for addressing groundwater contamination at Site 13 by transferring it into the on-going RCRA compliance action may have desirable features from immediate cost and institutional perspectives. The Navy, EPA, and Department, however, should review the details of the FFA, compliance order, and other applicable regulatory agreements to assure that no unintended and undesirable consequences are possible in such a transfer.

If you have any questions, please call me at (904) 488-3935.