

# Department of Environmental Protection

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Lawton Chiles  
Governor

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2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 31, 1996

AUG 12 1996

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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NAS PENSACOLA  
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Mr. Bill Hill  
Code 1851  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Draft *Focused Feasibility Study for Site 1*, NAS Pensacola

Dear Mr. Hill:

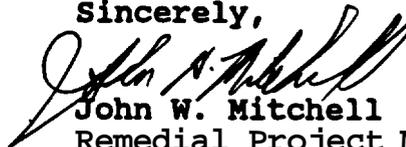
I have completed the technical review of the above referenced document dated May 1996 (received May 31, 1996). The document appears adequate except for a few minor changes which are addressed in the following comments. Also, please note the enclosed memorandum from Greg Brown, P.E..

1. In Section 1.3.1 (RI Assessment), the last paragraph on Page 1-16 should indicate that Florida Surface Water Quality Standards (SWQS) and Federal Ambient Water Quality Criteria (AWQC) were exceeded in some of the downgradient wetlands for inorganics and VOCs; specifically Wetlands 3, 16, and 18. This information is important related to which alternative is most appropriate for this site.
2. In Section 3.2.2 (Natural Attenuation), as well as the other alternatives, the portion on institutional controls for land use and groundwater restrictions requires editing, as the issue of the base management plan being adequate for these controls has yet to be decided. In the FFS, it would be better to just indicate land use restrictions for industrial use only, and that groundwater use beneath and downgradient of the landfill will be restricted.
3. I agree with Greg Brown, that Alternative 4b should be the preferred alternative due to inorganics (specifically iron) in monitoring wells adjacent to surface water bodies and wetlands exceeding SWQS; in some cases 40 times the standard.

Bill Hill  
July 31, 1996  
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If I can be of any further assistance with this matter,  
please contact me at (904) 921-9989.

Sincerely,



John W. Mitchell  
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola  
Jay Bassett, USEPA Region IV  
Henry Beiro/Brian Caldwell, EnSafe, Pensacola  
Allison Dennen, EnSafe, Memphis  
Karen Atchley, Bechtel, Knoxville  
Tom Moody, FDEP Northwest District  
Pat Kingcade, OGC/Trustee File

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# Memorandum

# Florida Department of Environmental Protection

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

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section

FROM: Greg Brown, P.E., Professional Engineer 11, Technical  
Review Section

DATE: July 29, 1996

SUBJECT: Draft Focused Feasibility Study; Site 1; NAS  
Pensacola, Florida.

I reviewed the subject document dated May 1996 (received May 31, 1996). It is adequate for its intent. Unless there are other significant comments from your team members, I suggest that this document be made final by changing the control copies' covers and inserting engineering certifications (including the administrative record copies). I have some minor comments you may wish to consider when selecting an alternative as the final remedy:

1. Alternative 2: Natural Attenuation. In general, Natural Attenuation is not an appropriate site "management philosophy" if there is a continuing source of contamination and a completed exposure pathway. The low levels of contaminants in both soil and groundwater indicate the landfill is still a likely source, and the tidal influenced groundwater indicates a hydraulic connection with surface water. Additionally, Alternative 2 has a contingency imbedded in it that may require an action in the future. For these reasons, this alternative is the least desirable of the three viable alternatives.
2. Alternative 3: Capping. To use a cliché, capping an old landfill seems to be like "closing the barn door after the horse is out." At specific landfills, this may be a reasonable strategy, but not at this landfill given the data and analysis. Additionally, this alternative requires destruction of the mature pine forest that presently covers the site. This may have deleterious impacts on wildlife habitat and any scenic and recreational values the area offers.

3. Alternative 4b: Groundwater Containment with Pumping and Treatment using Constructed Wetlands, This alternative offers attainment of the conventional threshold and balancing criteria. It also offers additional benefits not explicitly included in the FS. The constructed wetland may enhance wildlife habitat off-setting some of the past environmental impacts from the landfill activities. This would also complement the recreational values of the current adjacent landuse (e.g., Boy Scout Camp and Golf Course). One concern with this alternative, however, is that it should not increase ecological risks if the constructed wetland becomes an attractant to wildlife. Considering the sum total of its explicit and implicit benefits and its cost relative to the other alternatives, this appears to be the most desirable of the alternatives assessed in the FS.

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