

Department of Environmental Protection

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NAS PENSACOLA
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Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 7, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: Draft Focused Feasibility Study Report, Operable Unit 13
(Sites 8 & 24), NAS Pensacola

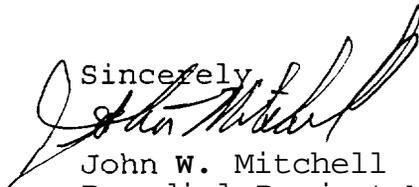
Dear Mr. Hill:

I have completed the technical review of the above referenced document dated May 15, 1998 (received May 19, 1998) and provide one comment. Also, please address the comments in the attached memorandum from Mr. Greg Brown, P.E.

1. In the Executive Summary on page iii, delete the sentence "For OU 13, annual groundwater monitoring is considered excessive." This is an opinion, which is not appropriate for inclusion in this document.

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

Sincerely,

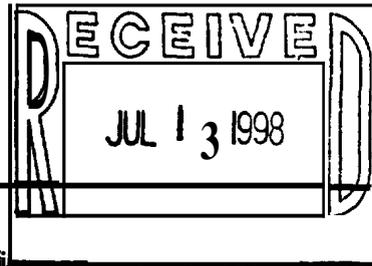


John W. Mitchell
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola
Gena Townsend, USEPA Region IV
Brian Caldwell, EnSafe, Knoxville
Allison Dennen, EnSafe, Memphis
Karen Atchley, Bechtel, Knoxville
Tom Moody, FDEP Northwest District

TJB JJC ESN

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: June 24, 1998

SUBJECT: Draft Feasibility Study Report, OU13, Sites 8 and 24;
NAS Pensacola, Florida.

I reviewed the subject Draft Feasibility Study for OU13, Sites 8 and 24, dated May 15, 1998 (received May 19, 1998). I have the following minor comments:

1. The Draft FS provides a reasonable range of alternatives for risk managers to consider.
2. The Draft FS narrative implies that cadmium is migrating from source areas via groundwater at concentrations that could pose public health or environmental impacts. The Draft FS claims, however, that it is "assumed that natural processes are decreasing cadmium concentrations to below MCLs before groundwater reaches OU13's northern boundary." Rather than assume, a reasonable quantification of the natural attenuation of cadmium should be made using either historical groundwater data or site-specific transport and fate modeling. If the later approach is used, any model in the judgment of the analyst sufficient to confirm the assumption is appropriate (e.g., simple "desk-top" analytical or elaborate computer based numeric models) as long as the logic and assumptions are explicit in the report.
3. Since one of the sites is planned to be used as a cemetery, the ingestion/inhalation exposure pathway should be considered for workers engaged in excavation. I recommend that you consult the Section's risk assessor for specific exposure assumptions.

If you have questions, please call me at (850) 488-3935.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"