



Jeb Bush
Governor

Department of Environmental Protection

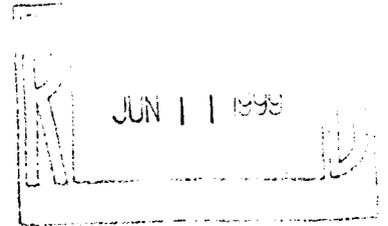
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David B. Struhs
Secretary

June 4, 1999

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



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NAS PENSACOLA
5090.3a

RE: Draft Record of Decision, Operable Unit 4, NAS
Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated April 2, 1999 (received April 6, 1999). I have the following comments that should be addressed in the final document.

1. Page 11, Section 4.0, Scope and Role of the Operable Unit: The last sentence in the opening paragraph states "The two technologies are independent of each other, because there is no correlation between contamination in surface soil and groundwater". It is highly probable that there is a direct correlation between surface soil contamination and groundwater contamination at this site. The selection of "independent" technologies is based on performance for reducing risk versus the cost for respective media.
2. Page 19, Groundwater Contamination, Paragraph 2: This paragraph supports my first comment on the correlation between arsenic contamination in the surface soil and the groundwater.
3. Page 30, Table 6-6, Toxicological Reference Information for Chemicals of Potential Concern: It would be helpful if abbreviations used in the column titled "Weight of Evidence" were explained in the notes at the bottom of this table.

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4. Page 44, Third paragraph: Arsenic is not considered an essential nutrient nor can it be attributed to saltwater intrusion at this site. I recommend this paragraph be deleted from the text.
5. Page 48, Table 7-1, Soil Threshold Concentrations: The remedial volumes calculated should also consider the soil leachability values for dieldrin (0.005 mg/kg) and chlordane (4.1 mg/kg).
6. I would recommend clarifying the cost assumptions as a maximum case scenario (30 years of monitoring).
7. Page 64, Table 7-3, Chemical Specific ARARs for the Selected Remedy: Drinking water standards in the State of Florida are established in Chapter 62-550 of the Florida Administrative Code (FAC). Chapter 62-520 of the FAC establishes groundwater quality standards and classification of groundwater aquifers within the state.
8. Table 8-1, Page 73: The cost benefit and time savings to the Navy for Alternative 2 is not apparent in this table. I would recommend clarifying the cost assumptions as a maximum case scenario. The actual cost and time frame for cleanup could be greatly reduced following soil removal since the source of groundwater contamination will be reduced.
9. Page 73, Section 8.1.3.1, State/Support Agency Acceptance: The State of Florida agrees with the selection of Alternative 2 for groundwater to remediate Site 15. Please note, upon revisions to the draft ROD, the final ROD will be forwarded to the Secretary of the Department for concurrence with the selected alternative. Until the Secretary concurs with the final ROD, State acceptance should be considered as "pending".
10. Page 79, Section 8.2.3.1, State/Support Agency Acceptance: The State of Florida agrees with the selection of Alternative 3 to remediate Site 15. Please revise the sentence to state Alternative 3. Please note, upon revisions to the draft ROD, the final ROD will be forwarded to the Secretary of the Department for concurrence with the selected alternative. Until the Secretary concurs with the final ROD, State acceptance should be considered as "pending".
11. Page 82, Table 9-1, Performance Standards for Groundwater: The criteria for Groundwater of Low

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Yield/Poor Quality cannot be applied to this site. The performance standard for arsenic in groundwater is currently 50 ppb.

In addition to the comments above, I recommend that chromium be reevaluated as a chemical of potential concern (COPC) in the Remedial Investigation (RI) Report. If chromium is found to contribute to risk in the groundwater, the following sections should be revised in the final document.

Page 19, Groundwater Contamination Section
Page 29, Table 6-2, Groundwater COPCs
Page 36, Section 6.1.6.2, Summary of Groundwater Risk
Page 42, Table 6-11, Groundwater RGO for Site Resident
Page 43, Table 6-12, Groundwater RGO for Site Worker

Upon revisions to this draft, I will forward the Final Record of Decision to the Secretary of the Department for concurrence.

If I can be of any further assistance with this matter, please contact me at (850) 921-9989.

Sincerely,

Joseph F. Fugitt

Joseph F. Fugitt, P.G.
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola
Gena Townsend, USEPA Region IV
Brian Caldwell, EnSafe, Knoxville
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Tom Lubozynski, FDEP Northwest District

TJB *TJB*

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