



## Department of Environmental Protection

Jeb Bush  
Governor

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2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

February 29, 2000

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 Proposed Plan and Public Notice, Operable Unit  
13, Sites 8 and 24, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated September 30, 1999 (received October 4, 1999). I have the following comments that should be addressed in the final document.

1. The Focused Feasibility Study (FFS) for OU 13 submitted May 15, 1998 should be finalized before submitting the Final Proposed Plan and Public Notice.
2. The FFS should include a comparative analysis for soil cleanup using the leachability scenario for cadmium and dieldrin (see Figure 2-3 in the FFS).
3. The FFS should also include a comparative analysis and estimated time for Monitored Natural Attenuation of Groundwater as a potential remedy.
4. The figure on page 3 does not correctly depict the extent of contamination for surface soils using an industrial scenario at the sites (see Figure 2-2 of the FFS).
5. Soil cleanup goals for leachability should be included in Table 1, Cleanup Goals for Surface Soil,
6. Cleanup goals for subsurface soils based on leachability should be listed for cadmium and dieldrin. Since cadmium and dieldrin are leaching to groundwater, a comparative analysis for soil cleanup using the

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Mr. Bill Hill  
Page Two  
February 29, 2000

leachability scenario for cadmium and dieldrin should be included in the FFS and proposed plan.

7. In Table 2, the applicable standard for Dieldrin, Manganese, and Thallium are 0.005(GCTL), 50 (FSDWS), and 2 (FPDWS) micrograms per liter (ug/L), respectively.

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  
~~Allison Harris, EnSafe, Memphis~~  
Charlie Goddard, FDEP Northwest District

TJB *TJB*

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