



Jeb Bush  
Governor

# Department of Environmental Protection

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NAS PENSACOLA  
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Colleen M. Castille  
Secretary

May 9, 2005

**Mr. Bill Hill**  
**Code ES311**  
**Southern Division**  
**Naval Facilities Engineering Command**  
**2155 Eagle Drive**  
**P.O. Box 190010**  
**North Charleston, South Carolina 29419-9010**

**RE: Final Focused Feasibility Study Report Site 38, NAS Pensacola, Florida**

Dear Mr. Hill,

The Department has reviewed the subject document dated October, 2004, (received November 19, 2004). The Department finds the document to be adequate for its intent. The following comments from Jeff Lockwood are provided for your consideration.

General Comments:

1. It appears that the site conditions have changed significantly such that the Feasibility Study needs to be revisited. For soil, the plan should be to excavate as much as possible, but the excavation plan should be supported by post-hurricane soil data. My concern is that the storm surge may have significantly impacted the contaminant distribution especially close to the surface.
2. There is also the possibility that the groundwater plume may have been affected by the hurricane. The most promising remedial alternative for groundwater appears to be pump and treat, as proposed in the Feasibility Study. Salt water intrusion may have at least temporarily impacted the geochemistry of the subsurface, and this would be most likely to impact the applicability of the natural attenuation and in-situ bioremediation alternatives. Regardless of the selected alternative, the aquifer characteristics including groundwater flow direction should be re-evaluated as the predicted capture zones in Figure 4-20 may no longer be relevant.
3. The issue of how much the groundwater analyticals have changed since the hurricane should be addressed in any case because this could affect the choice of preferred

alternative. For instance, if the plume has become more diffuse than what the year 2000 sampling indicates, bioremediation and/or MNA may become the preferred alternative.

4. I will defer further recommendations until a full set of post-hurricane soil and groundwater data is available. I suggest that data be obtained from all locations (or at least a representative subset of the previously sampled soil and groundwater locations) before proceeding further.

If I can be of any further assistance with this matter, please contact me at (850) 245-8998.

Sincerely,

A handwritten signature in black ink that reads "Tracie L. Vaught". The signature is written in a cursive style with a long horizontal line extending to the right from the end of the name.

**Tracie L. Vaught**  
**Remedial Project Manager**

JJC 

ESN 