



Jeb Bush
Governor

Department of Environmental Protection

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

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NAS PENSACOLA
5090.3a

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: Draft Feasibility Study Report for Operable Unit 2, NAS Pensacola, Florida

Dear Mr. Hill,

The Department has reviewed the subject document dated January 18, 2005, (received January 19, 2005). The Department finds the document to be adequate for its intent and approved. Please read the attached comments from Jeff Lockwood, Professional Engineer with the Department of Environmental Protection. If I can be of any further assistance with this matter, please contact me at (850) 245-8998.

Sincerely,

Tracie L. Vaught
Remedial Project Manager

JJC

ESN

**Florida Department of
Environmental Protection**

Memorandum

TO: Tracie Vaught
Federal Programs Section

FROM: Jeff Lockwood, P.E. JL
Federal Programs Section

DATE: April 26, 2005

SUBJECT: Feasibility Study Report, OU-2
NAS Pensacola
Pensacola, Florida

I have reviewed the submittal dated January 18, 2005 (received January 19, 2005). The report appears to address an adequate range of alternatives given the latest available soil and groundwater data. Although I understand that the site was not impacted by Hurricane Ivan to the same extent as other contaminated sites in the vicinity, the overall groundwater concentrations at this site appear to be within the Natural Attenuation Default Criteria, and I agree that groundwater recovery and treatment is unlikely to be cost-effective. A permeable reactive barrier may also be subject to uncertainties in the subsurface characteristics and could easily be bypassed if not well-keyed into a tight aquitard.

Phytoremediation, including the use of riparian corridors, bioremediation, and monitored natural attenuation appear to be the most appropriate groundwater remediation alternatives. A permeable reactive barrier was also considered, but this would be subject to uncertainties in the subsurface characteristics and could easily be bypassed if not well keyed into a tight aquitard.

For soils, asphalt capping would most likely need to be considered if contaminant levels close to the surface are still high enough to generate human health concerns around the developed areas (buildings), although it appears that much of this asphalt cover already exists, or will be replaced once excavation is completed. Elevated groundwater tables and flooding as a result of the hurricane would probably have a beneficial impact on residual soil hot spots. Given the likelihood of reduced levels of contaminants in soil, it appears that an adequate range of alternatives has been considered for soil remediation. Please note that in areas where soil capping is being considered in lieu of asphalt capping, the Department may request soil sampling to demonstrate that applicable leachability criteria will be met.

I believe that a visit to this site would be helpful in my understanding of the applicability of the alternatives mentioned above, especially if further guidance is requested in the alternative screening process. If you have any questions, please contact me at 7004 or (850) 245-7504.

JDL/jl