



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

March 10, 2006

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

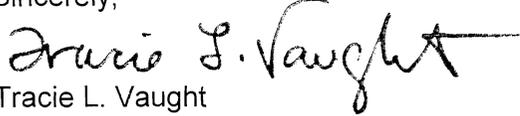
RE: Final Record of Decision Operable Unit 11,  
Site 38, Naval Air Station Pensacola, Pensacola, Florida

Dear Mr. Hill:

The Department has completed the review of the above referenced document dated December 13 (received December 14, 2005). The Department of Environmental Protection concurs with the Navy's selected remedy of Excavation of Industrial Hot Spots and Leachability Criteria Exceedances with offsite disposal and Monitoring for Natural Attenuation for the groundwater at Operable Unit 11, Site 38, Naval Air Station Pensacola. Enclosed please find a copy of the approval letter from Mary Jean Yon, Director, Division of Waste Management.

If you have any questions concerning this letter of concurrence, please contact Ms. Tracie L. Vaught, our NAS Pensacola Remedial Project Manager, at (850) 245-8998.

Sincerely,

  
Tracie L. Vaught  
Remedial Project Manager

TLV/tlv

Enclosure

cc: Mike Kennedy, Northwest District Office, Pensacola, Florida  
file

JJC 

ESN 



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

March 3, 2006

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

Dear Mr. Hill:

The Department of Environmental Protection concurs with the Navy's selected remedy of Excavation of Industrial Hot Spots and Leachability Criteria Exceedances with offsite disposal and Monitoring for Natural Attenuation for the groundwater at Operable Unit 11, Site 38, Naval Air Station Pensacola.

If you have any questions concerning this letter of concurrence, please contact Ms. Tracie L. Vaught, our NAS Pensacola Remedial Project Manager, at (850) 245-8998.

Sincerely,

Mary Jean Yon, Director  
Division of Waste Management

MJY/tlv

cc: file

Mike Kennedy, Northwest District Office, Pensacola, Florida

Florida Department of  
**Environmental Protection**

**Memorandum**

TO: Mary Jean Yon, Director  
Division of Waste Management

THROUGH: Douglas A. Jones, Chief *Jim Crane, Acting*  
Bureau of Waste Cleanup  
James J. Crane, P.G. Administrator *JJC*  
Federal Programs Section

FROM: Tracie L. Vaught, Project Manager *T/V 3/1/06*  
Federal Programs Section

DATE: March 3, 2006

SUBJECT: Final Record of Decision, Operable Unit 11, Site 38, Naval Air Station  
Pensacola, FL

Attached for your review and signature is a letter of concurrence to Southern Division Naval Facilities Engineering Command regarding the Record of Decision, Operable Unit 11, Site 38, Naval Air Station (NAS) Pensacola. The Record of Decision presents the selected remedy at Site 38 as Excavation of Industrial Hot Spots and Leachability Criteria Exceedances with Offsite Disposal for Soil, and Monitoring for Natural Attenuation for Groundwater. The selected alternative requires statutory review be conducted within 5 years after initiation of the remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

Site 38 includes Buildings 71 and 604, surrounding areas, and the associated Industrial Waste Water Treatment Plant (IWTP) sewer line. The southern edge of the one-acre site borders Pensacola Bay. Building 71 was used from about 1935 to the late 1970s for aircraft painting and paint stripping operations. More recently, it housed hazardous wastes. Building 604 was used for plating operations and other industrial purposes until they were discontinued in 1996 as part of base realignment.

Based on the Remedial Investigation the potential sources of contaminant releases were paint stripping operations at former Building 71 and a former underground solvent storage tank and plating shop at Building 604. The main areas of soil contamination were centered around Buildings 71 and 604, and at distinct points along the IWTP sewer lines. Soil contamination consisted of inorganics, pesticides, PCBs, and SVOCs detected in both surface and subsurface soil from the site at levels exceeding Soil Cleanup Target Levels (SCTLs). The subsurface soil has VOCs detected above SCTLs. Contamination in the groundwater showed that inorganics, SVOCs, and VOCs were present above their Groundwater Cleanup Target Levels (GCTLs) in the shallow groundwater below both Buildings 71 and 604. These findings are consistent with soil exceedances. However, based on sampling events over the years, concentrations in the groundwater appear to be decreasing.

A Remedial Investigation/Baseline Risk Assessment Addendum (RI/BRA Addendum) was prepared in September 1998. This document summarized the results of previous investigations,

*"More Protection Less Process"*

Ms. Mary Jean Yon  
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discussed the additional investigations, and described the nature and extent of contamination. This document was approved by the Department and University of Florida, the Department's risk assessment consultant, on March 1999. The Contaminants of Potential Concern were assessed in the ecological risk assessment evaluation conducted in accordance with the U.S. EPA Risk Assessment Guidance (RAG) for Superfund, U.S. EPA Region 4 Ecological Risk Assessment Bulletins – Supplement to RAGs, U.S. EPA Amended Guidance on Ecological Risk Assessment at Military Bases and the Navy Policy for Conducting Ecological Risk Assessments. The surface soil exposure pathways at Buildings 71 and 604 have been effectively eliminated by the widespread asphalt pavement and concrete flooring. The groundwater will be restricted through land use controls thus no human risk was identified in Site 38.

Natural terrestrial habitat features in and around Site 38 are absent. The only terrestrial receptors that appear to be present onsite are shorebirds that periodically frequent the area. Minimal soil contamination from the few exposed locations does not warrant further pathway-uptake analysis.

For Building 71, all locations with industrial SCTL and/or leachability criteria exceedances that are not located under existing asphalt/pavement surface will be removed. For Building 604, the estimated impacted volume of subsurface and surface soil to be excavated is approximately 1,100 cubic yards. The soil to be excavated includes all soil that exceeds industrial SCTLs. The contaminated soil will be excavated and disposed of properly and the area will be covered with two feet of clean fill. Excavation depth may vary from 2 to 5 feet below land surface and will be replaced with a minimum of 2 feet of clean fill material.

Natural attenuation was selected as the preferred groundwater alternative because it is expected to achieve long-term risk reduction. The combination of the soil and groundwater preferred remedies will reduce risk in a reasonable time frame and at a lower cost than some of the other alternatives, along with providing long-term reliability.

Land use controls (LUCs) will be implemented through administrative coordination to provide protection to human health. The site area will be formally documented as industrial/commercial use only. Re-evaluation will be required for any significant land use changes. The Remedial Design workplan will provide implementation actions for the LUCs for both subsurface soil and groundwater for this site.

The Remedial Investigation/Baseline Risk Assessment for this site was approved on March 4, 1999 and the Feasibility Study was approved on May 5, 2005. Based on the information available at this time, the Navy, USEPA, and FDEP believe the preferred alternatives will be protective of human health and the environment and will comply with Applicable or Relevant and Appropriate Requirements, be cost effective, and use permanent solutions and alternative treatment technologies to the maximum extent practicable.

I recommend you sign the attached letter of concurrence.

TLV/tlv

Attachments (2)

JJC 

ESN 