



Center for Environmental & Human Toxicology

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June 5, 2006

Ligia Mora-Applegate  
Bureau of Waste Cleanup  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Demolition Debris Disposal Area – Site 43

Dear Ms. Mora-Applegate:

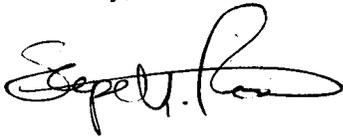
We have reviewed at your request the *Remedial Investigation Report for the Demolition Debris Disposal Area – Site 43* at the Naval Air Station in Pensacola. This document was prepared by Tetra Tech Nus, Inc and is dated March 7, 2006. As expected, this document closely follows EPA and FDEP risk assessment procedures. We do, however, have the following comments:

1. Surface soil samples taken on the borders of Anomaly Area 12 exceed residential SCTLs for arsenic and Benzo[a]pyrene (BaP). This suggests that the extent of the contaminated area may extend beyond the current borders.
2. Surface soil samples taken on the borders of Anomaly Area 23 contained a "hot spot" of arsenic and exceeded the residential SCTL for barium and vanadium. The adjacent area (Anomaly Area 24) was not analyzed for these metals but may also contain these chemicals of potential concern (COPC) in the surface soil.
3. Anomaly Area 17 was considered adequately delineated, but the surface soils were not tested for arsenic, barium, or vanadium. Adjacent areas have residential SCTL exceedances for these metals.
4. In Table 6-12 carbazole should be apportioned under the recreational user scenario.
5. SPLP tests were not conducted for arsenic, copper, or lead. Leachability may present a problem for arsenic and lead because these metals were found in surface soils above their residential and industrial SCTLs. Additionally, lead was detected above its GCTL in shallow groundwater at one location (PEN-43-GW13S01).
6. The Site 43 ecological risk assessment evaluates risk from surface soil contaminants only, as there are no surface water bodies or sediment on site. In addition, groundwater does not appear to pose risk to off-site surface water

bodies, as the directional groundwater flow does not form an exposure pathway to nearby surface waters. Maximum surface soil contaminants were compared to Region IV Ecological Screening Values as well as EPA Eco-Soil Screening Levels. This method is appropriate. However, upon comparison to the corresponding Region IV value of 1000 ug/kg, total PAHs were not retained even though the maximum value exceeded nearly twice the Region IV value (1919 ug/kg). The reasoning for this is not clear. A study was cited by Friday (1998), that used a value of 20,000 ug/kg to describe moderate PAH soil contamination. We do not believe it is appropriate to use alternative screening values without site-specific justification especially during the initial screening step, therefore we disagree with the elimination of total PAHs from further consideration. We do concur, however, with the report's conclusions that barium, copper and lead pose risks to invertebrates, small birds and mammals.

We would appreciate the opportunity to participate in a meeting to discuss these comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen M. Roberts". The signature is fluid and cursive, with a large initial "S" and "R".

Stephen M. Roberts, Ph.D.

A handwritten signature in black ink, appearing to read "Leah D. Stuchal". The signature is cursive and somewhat stylized, with a large initial "L" and "S".

Leah D. Stuchal, Ph.D.