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February 22, 2007

Patty Whittemore
OPG6
NAVFACSOUTHEAST
NAS Jacksonville Building 103
Jacksonville, FL 32212

Draft

N00204.AR.002127

NAS PENSACOLA

5090.3a

Re: **Draft Remedial Investigation Report for Site 46 (Former Building 72), Naval Air Station Pensacola, Florida**

Dear Ms. Whittemore,

The Department has completed the technical review of the above referenced document dated March 2007 (received March 23, 2007) and has the following comments:

- Page 4-45, Section 4.4, Surface Water and Sediments, 1st paragraph, 1st sentence:** The following sentence states, "Surface water and sediment samples were not collected for the site characterization investigation at Site 46 because no surface water bodies are present at the site." In the next sentence Pensacola Bay is referred to and Pensacola Bay is a marine surface water body and it is located downgradient from the site on the Southern boundary. Please clarify.
- Chapters 6 and 7:** The Department supports and concurs with the attached comments on Chapter 6 "Human Health Risk Assessment" and Chapter 7 "Screening Level Ecological and Risk Assessment" which were reviewed by the University of Florida.
- Page 8-3, Section 8.3, Groundwater Assessment, 2nd paragraph:** This paragraph discusses groundwater analytical results for pesticides, PCBs and TRPH and says lab analyses for those analytes had results that were below the laboratory detection limits. Please explain whether the "laboratory detection limits" cited are method detection limits (MDLs) or Practical Quantitation Limits (PQLs). Also, it should be stated whether those "laboratory detection limits" are below the applicable groundwater cleanup target levels (GCTLs) or below the concentrations listed in Table C, in the guidance document entitled, "Guidance for the Selection of Analytical Methods and for the Evaluation of Practical Quantitation Limits". If the "laboratory detection limit" for a particular analyte exceeds the GCTL for that analyte, and the PQL in the guidance document for that analyte, it may be required to have groundwater reanalyzed by a different EPA Method or by another laboratory in order to get data verifying the absence of that analyte.

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4. **Page 8-4, Figure 8-2, Extent of Impact to Site Groundwater Site 46:** What does the shading in this figure indicate? Please clarify and make the necessary changes to the figure.

5. **Section 8.3, Groundwater Assessment:** Contaminants of Concern (COC) detected in the groundwater and their impact on the Pensacola Bay surface water body are discussed in this section. The COCs that exceed Marine Surface Water Cleanup Target Levels (MWSWCTLs) are listed below:

- Vinyl Chloride
- Bis(2-Ethylhexyl)phthalate
- Naphthalene
- Beryllium
- Nickel

The COCs listed above have been detected in concentrations that exceed MWSWCTL in sentry monitoring wells located adjacent to the Pensacola Bay. This contamination is a violation per Chapter 62-780, F.A.C.. The Department recommends the following to determine if groundwater is contaminating Pensacola Bay:

- Install additional sentry monitoring wells closer to Pensacola Bay to determine if the groundwater contamination is affecting Pensacola Bay or
- conduct a Trident probe study to determine the same thing.

6. **Section 8.8 "Conclusions":** In this section, the proposed remedy for this site is Monitored Natural Attenuation. The Department will consider this option after the issues explained in the previous comments have been addressed. In addition, an explanation on how the inorganic groundwater contamination naturally attenuates needs to be included when discussing this remedy.

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

Sincerely

Tracie L. Bolanos
Remedial Project Manager

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