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December 12, 2007

Mr. Bill Hill
OPG6
NAVFACSOUTHEAST
P.O. Box 190010
North Charleston, South Carolina
29419-9010

N00204.AR.002162
NAS PENSACOLA
5090.3a

RE: Draft Remedial Investigation Report for Site 44 (Former Underground Storage Tank 3221) Naval Air Station, Pensacola Florida

Dear Mr Hill:

The Department has completed the technical review of the above referenced document dated June 2007(received June 22, 2007) with the following comments:

1. **Page ES-2, 4th paragraph General Issue:** In this paragraph, Tetra Tech state, "Carcinogens risks exceed 1×10^{-4} , for exposure to groundwater by hypothetical future resident." The Department has always required 1×10^{-6} for this scenario. Please review this and address this in the final Remedial Investigation report.
2. **Chapters 6 and 7:** Please review the attached comments from the University of Florida for the Departments comments on these chapters.
3. **Conclusions:** The Department concurs with the recommendation to proceed with a Feasibility Study for this site.

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

Sincerely,

Tracie L. Bolanos
Remedial Project Manager

JJC ESN



Center for Environmental & Human Toxicology

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October 8, 2007

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

Re: Remedial Investigation Report for Site 44

Dear Ms. Mora-Applegate:

At your request, we have reviewed the Remedial Investigation Report for Site 44 (Former UST Site 3221 SW), Naval Air Station Pensacola, Pensacola, Florida. Tetra Tech Nus, Inc. prepared this report in June 2007. This site is currently used to refurbish and clean aircrafts used in a museum display. This risk assessment considers receptor exposure under residential, industrial, and recreational land use scenarios including: occupational workers, maintenance workers, construction workers, adult/adolescent recreational users, and hypothetical future residents. A screening -level ecological risk assessment was also conducted. Based on our review, we have the following comments:

1. In section 4.0, both cadmium and lead SPLP results showed an exceedance in the leachability to groundwater criteria but were not discussed further as potential COPCs in section 6.0.
2. For arsenic, the site concentrations in soil appear to be indicative of background. The highest on-site value is 2.5 mg/kg. Any values above 2.5 mg/kg would need further evaluation.
3. On page 6-5, surface soil is defined as zero to one feet bls and subsurface soil is defined as soil collected from depths one to nine feet bls. Chapter 62-780, FAC defines surface soil as soil located from zero to two feet bls and subsurface soil as greater than two feet bls.
4. For the construction worker scenario, a groundwater exposure route should be added for completeness to account for inadvertent exposure to groundwater during construction activities.
5. A soil-to-air inhalation pathway was not included in the risk assessment evaluation due to partial covering of the site with asphalt and concrete. Although exposed soil may not be a significant portion

References:

US EPA (2002) *Supplemental guidance for developing soil screening levels for superfund sites*. Solid Waste and Emergency Response. OSWER 9355.4-24.

US EPA (2004) *Risk Assessment guidance for superfund volume I: Human health evaluation manual (Part E, supplemental guidance for dermal risk assessment)*. Office of Superfund Remediation and Technology Innovation, Washington, D.C.