



Florida Department of Environmental Protection

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March 5, 2010

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NAS PENSACOLA

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Ms. Patty Marajh-Whittemore
Naval Facilities Engineering Command Southeast
Post Office Box 30
Building 903
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Final Feasibility Study for Operable Unit 20, Site 45 – Building 603 Lead Site,
Naval Air Station Pensacola, Pensacola, Florida.

Dear Ms. Marajh-Whittemore:

The Department has completed its review of the Draft Final Feasibility Study (FS) for Operable Unit 20, Site 45 – Building 603 Lead Site, Naval Air Station Pensacola, dated October 2009 (received November 4, 2009), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Draft Final FS:

- (1) On page 1-5, Section 1.2.3.3, last sentence, it says that the depth to the shallow surficial aquifer is approximately 13 feet bgs at Site 45. This is incorrect as the depth to the water table is approximately 4 feet bgs. The depth of the shallow surficial aquifer is being confused with the total depth of shallow monitoring wells that have screens that intersect the water table.
- (2) On page 1-7, Section 1.4.1, first paragraph, some of the groundwater chemicals of concern (COCs) have been inadvertently added to a discussion regarding chemicals detected in soil.
- (3) On page 1-8, Section 1.4.2, second sentence, it says that Table A of Chapter 62-785, Florida Administrative Code, specifies chemicals that have secondary standards. This is incorrect. Table A of Chapter 62-785, F.A.C., contains groundwater cleanup target levels (GCTLs) calculated solely based on protection of human health for chemicals that either have GCTLs listed in Chapter 62-777, F.A.C., based on organoleptic considerations (example: cumene) or have secondary standards.
- (4) On page 1-8, Section 1.4.2, the terms “background concentration” and “reference concentration” are both used in the same paragraph. If the terms mean the same

thing, one term should be chosen and referred to throughout the document for consistency and clarity sake. If there are differences between "background concentration" and "reference concentration", the differences should be explained.

- (5) One page 1-11, second paragraph from the top of the page, first sentence, please revise the sentence to read correctly per my comment (3) above.
- (6) On page 2-6, Section 2.2.1, second paragraph, it discusses the use of the 95% upper confidence level (UCL) of the mean. Please identify this as a technique for calculating exposure point concentrations for a specified area to which a receptor could be exposed and that the technique requires apportionment of the risks of like-acting chemicals per Chapter 62-780, F.A.C.
- (7) On page 2-9, Section 2.4.2, it describes how the volume of contaminated groundwater was estimated. I found the description somewhat confusing. A figure depicting graphically how the volume was calculated would be appreciated. Please note that the volume calculated in this section is extremely important in deriving costs for any remedy that actively treats groundwater.
- (8) On page 3-6, Section 3.2.3, subsection on Cost, same comment as (1) above.
- (9) On page 4-15, Component 1, fourth sentence, please replace the word "in-situ" with the word "ex-situ". This will conform with what is written in Component 3.
- (10) On page 4-19, Section 4.3.1.2, subsection on Long-Term Effectiveness and Permanence, please change "surface water" to "groundwater".
- (11) Why has the active treatment component for groundwater been limited to in-situ treatment? There are other groundwater treatment options available that could have been evaluated in the FS. Please note that monitoring groundwater for the natural attenuation of metals like lead (Pb), mercury (Hg) and vanadium (V) could be a very expensive option if natural attenuation processes are very slight and no appreciable difference is detected between monitoring events. It may be advisable to estimate timeframes for remediating groundwater via natural attenuation and active treatment in order to better calculate which remedy is truly the most cost effective option.

Ms. Patty Marajh-Whittemore
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If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,

A handwritten signature in blue ink that reads "David P. Grabka". The signature is fluid and cursive, with a long horizontal stroke at the end.

David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Tim Bahr, FDEP
Greg Fraley, USEPA, Atlanta
Gerald Walker, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola

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