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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING REVIEW OF DRAFT FEASIBILITY STUDY SITE 15 NAS PENSACOLA FL
5/29/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Department of
Environmental Protection

Memorandum

TO: John Mitchell, Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section

FROM: Greg Brown, P.E., Professional Engineer II, Technical Review Section

DATE: May 29, 1998

SUBJECT: Draft Feasibility Study, Site 15; NAS Pensacola, Florida.

I reviewed the subject Feasibility Study for Site 15 dated April 21, 1998 (received April 22, 1998). I have the following minor comments:

1. The FS provides a reasonable range of alternatives for risk managers to consider. The comparative analysis, however, may be distorted. The volume of contaminated media is not based on adequately protective remedition goals. Balancing factors such as cost-effectiveness and implementability, among others, may therefore not be commensurable between alternatives. This will make remedy selection and implementation difficult for risk managers since they may need to revisit the comparative analysis at an inopportune time in the project life cycle. Using volume estimates based on adequately protective criteria and repeating the comparative analysis will thus give risk managers better information to make decisions. Rather than spend Department resources by commenting on the details of the draft comparative analysis, I suggest that the volume calculations and comparative analysis be refined first.

2. Prior Feasibility Studies from Pensacola NAS (for example, Site 38) took exception at using ARARs as remedial goals for groundwater contamination, advocating instead alternative risk-based concentrations. This FS rejects this approach and embraces groundwater ARARs without hesitation. This is interesting in light that the U.S. EPA is proposing possible changes in the current MCL for arsenic from 50 ug/l to somewhere between 2 and 20 ug/l. The lower level of 2 ug/l is based on an estimated incremental excess cancer risk of 1 in 10,000. The choice between ARARs or alternative risk-based concentrations in this FS is apparently one of expedience.

If you have questions, please call me at (850) 488-3935.