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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING TECHNICAL REVIEW OF FINAL FEASIBILITY STUDY REPORT  
RESPONSES SITE 38 NAS PENSACOLA FL  
9/15/2000  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

September 15, 2000

Mr. Bill Hill  
Code 1851  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Final Feasibility Study Report Responses, Site 38, NAS  
Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated June 5, 2000 (received June 12, 2000). In addition, I have reviewed the Partnering Team Meeting Minutes for October 27 to 29, 1997. I have comments regarding the decisions outlined in this response that should be addressed in any revisions of the Final Feasibility Study.

1. The point of compliance for surface water must be in the groundwater at the closest monitoring well prior to the point of discharge and cannot be at the mixing zone in the surface water body.
2. The Feasibility Study should address soil leachability since soils potentially represent a source for groundwater contamination.

Using the 95% upper confidence limit is at least one approach suggested by the University of Florida for evaluating risk from direct exposure to contaminated soils. The document was not available during the October 1997 meeting. This approach has been used recently at other Navy facilities. I agree with using this approach to evaluate the direct exposure soil risk at Site 38.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

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Mr. Bill Hill  
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If I can be of any further assistance with this matter,  
please contact me at (850) 921-9989.

Sincerely,

*Joseph F. Fugitt*

Joseph F. Fugitt, P.G.  
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola  
Gena Townsend, USEPA Region 4  
Tom Dillon, NOAA, USEPA Region 4  
Brian Caldwell, EnSafe, Knoxville  
Allison Harris, EnSafe, Memphis  
Terry Hansen, Tetra Tech NUS, Inc., Tallahassee  
Charlie Goddard, FDEP Northwest District

TJB

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