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COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION TO
DRAFT PROPOSED PLAN SITE 1 NAS PENSACOLA FL
10/1/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

ENSAFE

ENSAFE INC.
5724 Summer Trees Drive
Memphis, TN 38134

FAX

Phone 901-372-7962

Fax 901-372-8930 Bldg. 1 901-372-6023 Bldg. 4 901-383-1743 JVSO
901-372-2454 Bldg. 2 901-386-4628 Bldg. 5

To: Bill Hill/ Bill bates Ron Joyner	From: Allison	Date: 10/1/97
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Fax to number: (904) 452-2150 Number of pages: 3

Remarks:

See attached.

Allison

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**Florida Department of Environmental Protection
Comments on Naval Air Station Pensacola
Draft Proposed Plan for Site 1**

Comment 1:

The subsection *Wetlands and Bayou Grande* of the Remedial Investigation (RI) Summary, on page 4, should indicate that the Florida Surface Water Quality Standard (SWQS) for iron was exceeded in all the wetland samples adjacent to the site. Other metals (e.g., lead; aluminum) also exceeded their SWQS in a limited number of the samples.

Response:

Agreed. The iron exceedance of the Florida Surface Water Quality Standard has been included. It has also been noted that lead and aluminum also exceeded the standards for surface water in a limited number of samples.

Comment 2:

In Table 1 (*Cleanup Goals for Groundwater*), the following inorganic and organic constituents (aluminum; antimony; beryllium; chromium; iron; lead; mercury; vanadium; tetrachloroethene; naphthalene) should also be included as they exceeded the states drinking water standards. Some of these constituents exceeded the standards in both the shallow and the intermediate portion of the surficial aquifer.

Response:

Aluminum, cadmium, chromium, iron, lead, bromoform, naphthalene, and xylene have been added to Table 1. Antimony, beryllium, mercury, vanadium, and tetrachloroethene were not included because the parameters were not detected above standards in the 1994 sampling event.

Comment 3:

The subsection *Ecological Risk: Groundwater* of the section Site Risk indicates that the Ecological Risk Assessment shows "no noticeable ecological risk from groundwater discharge to wetlands near Site 1." Although further evaluation of the adjacent wetlands will occur in the Site 41 Remedial Investigation, the groundwater discharge from Site 1 exceeds the SWQS and poses a potential risk yet to be quantified. This section needs to indicate that exceedence of the SWQS from groundwater is not acceptable to the state. Ecological risk in the wetland is yet to be determined.

Response:

The text has been revised to state that ecological risk to the wetlands will be assessed during the Site 41 remedial investigation.

Comment 4:

Alternative 3 (Description of Alternatives) needs to show that institutional controls will also include restricted use of the groundwater.

Response:
Agreed.

Comment 5:

The subsection *Overall Protection of Human Health and the Environment* under the section Comparison of Alternatives needs to delete statements that ecological risk to the wetland from groundwater discharge is minimal. Ecological risk from the wetlands is yet to be determined. This section should state that Alternatives 2 and 3 do not eliminate groundwater discharge above SWQS in the adjacent wetlands.

Response:

The section has been revised to state that groundwater discharge above the Florida SWQS has not been eliminated under Alternative 3. Alternative 2 has been revised to include the options presented in the Site 1 FFS Addendum.

Comment 6:

I believe the Preferred Alternative on Page 8 should be Alternative 4; treatment of the groundwater prior to discharge into the surface waters of the wetlands, either through a groundwater pump-and-treat system or through a wetland treatment system.

Response:

The preferred alternative is Natural Attenuation for the landfill with groundwater interception and treatment for the Wetland 3 area.