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LETTER REGARDING REVIEW AND COMMENTS ON DRAFT PROPOSED PLAN SITE 46
FORMER BUILDING 72 NAS PENSACOLA FL
6/3/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

June 3, 2011

Ms. Patty Marajh-Whittemore
Naval Facilities Engineering Command Southeast
IPT, Gulf Coast
Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Proposed Plan, Operable Unit 21, Site 46, Former Building 72, Naval Air Station Pensacola, Pensacola, Florida.

Dear Patty:

The Department has reviewed the Draft Proposed Plan, Operable Unit 21, Site 46, Former Building 72, Naval Air Station Pensacola, dated February 2011 (received February 14, 2011), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the document:

- (1) On page 1, left column, The Cleanup Proposal, second paragraph, please replace the word "criteria" with "risks".
- (2) On page 5, left column, inorganic and organic chemicals detected in surface and subsurface soil above regulatory criteria are listed. The regulatory criteria that are exceeded are mentioned as either a standard, a criterion, or a criteria. Please pick one and use it consistently for each chemical. Also, please identify for each chemical whether it is a state or federal standard that is being exceeded.
- (3) On page 5, right column, bottom bullet, please note that the federal MCL for vinyl chloride is 2 µg/L (2 ppb).
- (4) On page 6, right column, Step 1, in the discussion of surface soil, COPCs are identified as including aluminum, iron and Arochlor-1260, all of which are not mentioned as having been detected on page 5. Also, several contaminants listed on page 5 were not listed on page 6. I have the same comment concerning the COPCs listed for subsurface soil and groundwater.

- (5) On page 8, right column, middle of the page, it says that bis(2-ethylhexyl)-phthalate was not retained as a COC after resampling indicated that it was not present. In the next two sentences, it says that 2-methylnaphthalene, bromodichloromethane and chlorodibromomethane were not retained because they did not exceed regulatory criteria. Was this during the resampling event that is mentioned in the discussion on bis(2-ethylhexyl)-phthalate? When was this resampling done? I could not find a mention of it in the "History of Site Investigations" located on the right side of page 2.
- (6) Please note that for the ecological pathway, the Department considers the groundwater to surface water (Pensacola Bay) pathway to be important. While contaminants have not been shown so far to have reached the bay by this pathway, groundwater monitoring will be required to show that this pathway for contaminant migration remains incomplete.
- (7) On page 9, left column, last paragraph on bottom of page, please remove the word "unacceptable" that is used twice in the paragraph.
- (8) On page 9, right column, bottom of the page, Subsurface Soil, the lead criteria of 15 ppb seems too low. The residential SCTL for lead is 400 ppm. It would appear the GCTL for lead is listed there.
- (9) On page 10, Groundwater, please note that the Florida MCL for trichloroethene is 3 ppb ($\mu\text{g}/\text{L}$). Also, the federal MCL for vinyl chloride is 2 ppb ($\mu\text{g}/\text{L}$).
- (10) For alternatives G-2 and G-3, natural attenuation processes are identified as being able to reduce inorganic contaminants. Please identify the natural processes by which this would occur.
- (11) On page 12, left column, in the section **Evaluation of Alternatives**, first paragraph, the paragraph stops and then reappears at the top of the page in the right column.
- (12) On page 12, compliance with ARARs for the soil cleanup alternatives is discussed, but the term ARARs is not explained until the end of the section on page 13.
- (13) On page 12, right paragraph, near bottom of the page, it says that federal and state location-specific ARARs (i.e. requirements because a site is on or near a wetland or surface water) for soil do not apply to Alternatives S-1 and S-2. While

I would concur that there is not a soils remediation location-specific ARAR, I would identify salt-water surface water cleanup target levels (Chapter 62-777, Florida Administrative Code) as location specific-ARARs for groundwater located adjacent to and discharging into Pensacola Bay.

- (14) On page 14, left column, Compliance with ARARs, first sentence, please swap GW-2 and GW-3. On same page, left column, Long-Term Effectiveness and Permanence, second paragraph, please swap GW-2 and GW-3.
- (15) On page 14, Reduction of Toxicity, Mobility, or Volume Through Treatment, first sentence, please change it to read that Alternative GW-2 would not reduce the toxicity, mobility or volume of the COCs through treatment because no treatment would occur.
- (16) On page 14, Reduction of Toxicity, Mobility, or Volume Through Treatment, second sentence, please explain how alternatives GW-2 and GW-3 would reduce the mobility of the inorganic contaminants over time by adsorption to sediment beyond that which would happen if Alternative GW-1, No Action, were selected.

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



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

CC: Julie Corkran, EPA Region 4, Atlanta
Gerald Walker, TtNUS, Tallahassee
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