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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FINAL
RECORD OF DECISION FOR SITE 43 NAS PENSACOLA FL
2/26/2010
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary-Designee

February 26, 2010

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 Record of Decision for Site 43 (Operable Unit 18) – Demolition Debris Disposal Area, Naval Air Station Pensacola, Pensacola, Florida.

Dear Ms. Marajh-Whittemore:

The Department has completed its review of the Draft Final Record of Decision (ROD) for Site 43 – Demolition Debris Disposal Area, Naval Air Station Pensacola, dated August 2009 (received September 1, 2009), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments and directions on a path forward for the Draft Final ROD:

- (1) Please formalize the information provided in your February 10, 2010 e-mail regarding past activities in the vicinity of Site 43. The information should be provided in the form of a letter and appended to the White Paper that has been prepared to address secondary standard exceedances in groundwater at this site. The White Paper should also be finalized.
- (2) Please change the argument in the Record of Decision for eliminating iron and manganese as chemicals of concern (COCs) for groundwater. Please replace the secondary standard and non-health based argument with the one prepared in the White Paper, specifically that high iron and manganese concentrations were determined not to be related to past disposal activities at the site.
- (3) Please verify the contents of Table 2-4. The calculated ILCR for residential exposure to subsurface soil cPAHs is incorrect, it should be 2.0×10^{-6} . I also cannot determine where the SCTLs for lifelong recreational exposure to surface and subsurface soils for arsenic and cPAHs were derived. What exposure assumptions went into the lifelong recreational exposure risk calculations? It should also be noted that the term cPAHs is being used in places in the ROD as though it meant the same thing as benzo(a)pyrene equivalent (BAPEq).

- (4) Because the concentrations in Table 2-5 are in mg/kg, the residential and industrial SCTLs for cPAHs should be 0.1 mg/kg and 0.7 mg/kg, respectively.
- (5) On page 16, Section 2.8, last paragraph, last sentence, please change "in-site" to "in-situ".
- (6) Please fix Table 2-9. S-1 should be "Excavation and Off-Site Disposal to Meet Industrial SCTLs and LUCs". Also, S-3 should not have a lower value for "Overall Protection of Human Health and the Environment" than S-1 and S-2. Also, please change the value for S-3 for "Reduction of Toxicity, Mobility and Volume" to at least medium.
- (7) On Table 2-10, please fix the column headings by adding G-1 and G-2.
- (8) On page 21, Section 2.9.2, third paragraph, first sentence, please insert the word "remaining" between the words "the" and "contaminated". Please also replace the word "industrial" with the word "residential" in that same sentence.

Please make the changes requested above to the ROD and submit the final signed ROD to the Department. If you have any concerns 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: Tim Bahr, FDEP
Greg Fraley, USEPA, Atlanta
Gerald Walker, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola

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