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NAS PENSACOLA  
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LETTER AND CONCURRENCE FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING RECORD OF DECISION OPERBALE UNIT 2 (OU2) WITH  
ATTACHMENT NAS PENSACOLA FL

4/2/2009

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

April 2, 2009

Commanding Officer  
Attention: Ms. Patty Marajh-Whittemore  
Naval Facilities Engineering  
Command Southeast  
Post Office Box 30, Building 903  
Naval Air Station Jacksonville  
Jacksonville, Florida 32212-0030

Dear Ms. Marajh-Whittemore:

The Department of Environmental Protection has reviewed the Record of Decision for Operable Unit 2 (OU 2), at Naval Air Station Pensacola and concurs with the selected remedy proposed in that document. The selected remedy for OU 2 consists of a soil removal action, natural attenuation of contaminants in groundwater, long-term groundwater monitoring and land use controls. The land use controls will prohibit residential use of the site, excavation and removal of soils from the site and use of groundwater from the aquifer underlying the site.

If you have any questions concerning this letter of concurrence, please contact Ms. Tracie L. Bolanos, our Naval Air Station Pensacola Remedial Project Manager, at (850) 245-8998.

Sincerely,

Mary Jean Yon, Director  
Division of Waste Management

MJY/tlb

# Memorandum

# Florida Department of Environmental Protection

TO: Mary Jean Yon, Director  
Division of Waste Management

THROUGH: Douglas A. Jones, Chief *3/27/09*  
Bureau of Waste Cleanup

James J. Crane, P.G. Administrator *JJC*  
Federal Programs Section

FROM: Tracie Bolanos, Remedial Project Manager *TB*  
Federal Programs Section

DATE: March 24, 2009

SUBJECT: Record of Decision, Operable Unit 2, Sites 11, 12, 25, 26, 27 & 30, Naval  
Air Station Pensacola, Pensacola, Escambia County

Attached for your review and signature is a letter of concurrence to the Naval Facilities Engineering Command (NAVFAC) Southern Division regarding the Record of Decision (ROD) for Operable Unit 2 (OU 2), Sites 11, 12, 25, 26, 27 & 30, Naval Air Station (NAS) Pensacola, Pensacola.

OU 2 consists of contaminated soil and groundwater identified at Sites 11, 12, 25, 26, 27 & 30 at NAS Pensacola, which have been grouped together because of their proximity. OU 2 is located in the eastern portion of NAS Pensacola and is comprised of six individual sites: Site 11 – North Chevalier Field Disposal Area, Site 12 – Scrap Bins, Site 25 – Radium Spill Area, Site 26 – Supply Department Outside Storage Area, Site 27 – Radium Dial Shop Sewer, and Site 30 – Complex of Industrial Buildings and Industrial Wastewater Treatment Plant Sewer Line. The OU is approximately 68 acres in size. A brief description of the sites that compose OU 2 follows:

- Site 11 – North Chevalier Field Disposal Area is a former landfill where industrial and municipal wastes were disposed of and burned from the late 1930s to the mid-1940s. The area, mostly covered with vegetation, occupies approximately 20 acres southwest of an extension of Bayou Grande called the Yacht Basin.
- Site 12 – Scrap Bins is currently referred to as the Defense Reutilization and Marketing Office Recyclable Materials Center and is used to store scrap metal. The site is approximately 800 feet northwest of former Chevalier Field and immediately west and upgradient of Site 26.
- Site 25 – Radium Spill Area is an approximately 50-foot by 50-foot concrete-paved area located immediately east of Murray Road and north of Farrar Road. The site includes an area east of the radium decontamination building (Building 780) where a radium spill is reported to have occurred. Additionally, a former helicopter scrap yard approximately 25 feet east of Building 780 is currently used as a parking area for Navy Exchange semi-trailers.

*"More Protection, Less Process."*

*Printed on recycled paper.*

- Site 26 – Supply Department Outside Storage Area is northwest of former Chevalier Field. The approximately 150-foot by 200-foot area houses an open metal shed near a former chemical storage building. DRMO uses this area to store paints, fuels, and solvents. Site access is limited by an 8-foot chain-link fence surrounding the storage area.
- Site 27 – Radium Dial Shop Sewer extends through the concrete foundation of former Building 709. The building was demolished, and the foundation is currently a parking lot.
- Site 30 – Complex of Industrial Buildings and Industrial Wastewater Treatment Plant Sewer Line covers approximately 35 acres and is also known as the Building 649 complex. The buildings were used by the Dynamic Component Division of the former Naval Aviation Depot and several aircraft component repair functions. In addition to the buildings, the Site 30 investigation included a portion of the sewer line from the Building 649 complex to the industrial wastewater treatment plant (IWTP). The sewer line investigation included lines at Sites 25, 27, and 30 and their downstream segments along with the sewer extending from the Building 649 complex, the feeder line from Building 3220, and the main line running to the IWTP. Wetland 5A is located to the south of Site 30. Surface water from the wetland drains to the southeast to a ditch that flows northeastward to the Yacht Basin.

Several environmental investigations were performed at OU 2 including a Remedial Investigation Feasibility Study (RI/FS), which included a wetlands delineation study and two different removal events conducted at the site.

Investigations of the soils at OU 2 reported concentrations above the soil cleanup target levels (SCTLs) for volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs), pesticides/PCBs and inorganics (metals). Investigations of the groundwater at OU 2 reported concentrations above the groundwater cleanup target levels (GCTLs) for VOCs, SVOCs, pesticides/PCBs and metals.

The risk to ecological receptors for the six sites included in OU 2 was assessed. No unacceptable risks to ecological receptors were identified. There is no quality habitat available because most of the area is paved or occupied by buildings. Only the grass between the roads and buildings could be used by terrestrial receptors such as perching birds and/or small animals.

The concentrations of chemicals of concern in surface soil and subsurface soil exceed SCTLs. Specific areas have been identified for the excavation of soils necessary to meet our industrial SCTLs. Since OU 2 is an industrial area, the removal of the soil and implementation of LUCs will prevent unacceptable risks to human health. The response action presented in the ROD is adequate to protect the public health and welfare and the environment from actual or threatened releases of hazardous substances into the environment.

The following Remedial Action Objectives were established for OU 2:

- Protect human health by eliminating or preventing exposure to contamination in surface soil by chemicals of concern that exceed Florida SCTLs.

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Mary Jean Yon  
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- Eliminate a continuing contamination source to groundwater by eliminating chemicals of concern in surface and subsurface soil at concentrations that exceed Florida SCTLs for leachability.
- Reduce human health risk from exposure to groundwater by reducing groundwater contamination at OU 2 to meet Florida GCTLs.

The selected remedy at OU 2 consists of three major components: (1) monitored natural attenuation of contaminated groundwater, (2) additional removal of selected soil areas, and (3) land use controls (LUCs).

The expected outcomes of the selected remedy may be summarized as follows:

- After the removal of areas of soil identified for excavation, detected concentrations remaining in soil will no longer present an unacceptable threat to human health or the environment assuming that only nonresidential (industrial) uses of the sites are permitted. Surface soil areas identified as exceeding industrial State of Florida SCTLs will be removed and replaced with clean fill to prevent unacceptable exposure.
- Since contamination is present in groundwater at concentrations greater than FDEP GCTLs, groundwater monitoring will be performed to verify that no unacceptable contaminant migration is occurring and to evaluate reductions in contaminant concentrations through MNA.

Because this remedy will result in hazardous substances, pollutants, or contaminants remaining on site in excess of levels that allow for unlimited use and unrestricted exposure, in accordance with Section 121(c) of CERCLA and NCP §300.430(f)(5)(iii)(c), a statutory review will be conducted within 5 years of initiation of remedial action and every 5 years thereafter to ensure that the remedy continues to be protective of human health and the environment.

The public was provided an opportunity to review and comment on the OU 2 Proposed Plan. A Public Notice was published in the Pensacola News Journal on May 11, 2008 informing the public that the Proposed Plan was available for review at the NAS Pensacola Information Repository and requesting that all comments be submitted to the Navy by June 25, 2008. No comments were received from the public during the comment period; therefore, no significant changes to the remedy, as originally identified in the Proposed Plan, were necessary or appropriate.

Captain William R. Reavey, Commanding Officer for NAS Pensacola, signed the ROD on September 30, 2008. Franklin Hill, Director of EPA Region 4's Superfund Division, signed the ROD on September 30, 2008. I recommend you sign the attached letter concurring with the selected remedy for OU 2 at NAS Pensacola.

TB/tlb

Attachment