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LETTER FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING
DRAFT EXPLANATION OF SIGNIFICANT DIFFERENCES OPERABLE UNIT 1 (OU1) SITE 1
SANITARY LANDFILL NAS PENSACOLA FL
3/25/2013
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

March 25, 2013

Ms. Patty Marajh-Whitemore
Remedial Project Manager
ITP Gulf Coast
Naval Facilities Engineering Command Southeast
Attn: AJAX Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Draft Explanation of Significant Differences, Operable Unit 1, Site 1 – Sanitary Landfill,
Naval Air Station Pensacola, Pensacola

Dear Patty:

The Department has reviewed the Draft Explanation of Significant Differences (ESD), Operable Unit (OU) 1, Site 1 – Sanitary Landfill, Naval Air Station Pensacola, dated March 2012 (received April 2, 2012), prepared by Tetra Tech NUS, Inc. With this document the Navy was proposing to formally change the selected remedy for OU 1, Site 1, by discontinuing the operation of the groundwater interceptor trench system component and modifying the surface water monitoring program. The ultimate result of this change would be that:

- Groundwater contaminated with iron and other contaminants collected in the previously installed groundwater interceptor trench would no longer be actively pumped to the wastewater treatment system;
- Only passive treatment of groundwater passing through the alkaline limestone material within the interceptor trench would continue; groundwater contaminated with iron would continue to discharge to Wetland 3 at concentrations above its surface water standard and background concentration;
- Surface water discharging from Wetland 3 to Wetland 4D with iron concentrations above the Department's surface water standard and the background concentration would continue; and
- Surface water monitoring would be revised to ensure that iron concentrations were below the surface water standard or NAS Pensacola background screening concentration (whichever is higher) at the point of discharge from Wetland 4 to Bayou Grande.

The Navy's stated reasons for changing the selected remedy for OU 1, Site 1, are that the groundwater interceptor trench system did not make an appreciable change in iron concentrations in groundwater or in surface water in Wetland 3, and that the iron concentrations in Wetland 3 are not adversely affecting human health or the environment.

Ms. Patty Marajh-Whittemore
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The discharge of groundwater with high iron concentrations to Wetland 3 has clearly been occurring for many years, possibly since the landfill was in operation or since it was closed in 1976. The Department also agrees that the interceptor trench system for removing iron contaminated groundwater, that operated from 1999 to May 2010, did not have the anticipated effect of reducing the overall iron concentrations in surface water within Wetland 3 because of the prevalence of iron upgradient, sidegradient and downgradient to the interceptor trench. However, the Department considers the discharge of the contaminated groundwater to Wetland 3 to be a violation of the surface water criteria of Sections 62-302.500 and 62-302.530, Florida Administrative Code (F.A.C.). The contaminated site created by the discharging landfill must be addressed pursuant to the requirements of Chapters 62-780 and 62-777, F.A.C., which requires cleanup of all affected media including groundwater, surface water, soil and sediment. The Department could concur with any proposed remedy for OU 1 that remediated groundwater prior to its discharge to Wetland 3, thereby meeting surface water criteria. The Department is also willing to consider a remedy that temporarily utilizes Wetland 3 as a treatment system. However, we are still in the process of determining whether such a remedy would be allowed under Florida's governing statutes and rules for determining wetlands jurisdiction.

Wetland 3 and Wetland 4D are "waters" of the state as defined by Section 403.031(13), Florida Statutes. Continuing discharge of high concentrations of iron from groundwater to the surface water in Wetland 3 is a violation of the minimum criteria of Section 62-302.500(1)(a), F.A.C., as well as the numeric criteria of Section 62-302.530, F.A.C. It is also evident that the remedy as proposed in the Draft ESD would not seek to actively reduce concentrations of iron in groundwater or surface water and would allow continuing, possibly perpetual violations of groundwater cleanup target levels and surface water criteria. Therefore, the Department does not concur with the remedy specified in the Draft ESD.

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

