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EMAIL REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE OPERABLE UNIT 2 (OU 2) SITE 11 WHITE PAPER NAS PENSACOLA
FL
4/11/2014
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Walker, Gerry

From: Grabka, David <David.Grabka@dep.state.fl.us>
Sent: Friday, April 11, 2014 3:43 PM
To: 'Sam.Naik@CH2M.com'; Woolheater.Tim@epa.gov
Cc: patty.whittemore@navy.mil; gregory.campbell@navy.mil; aharris@Ensafe.com; Walker, Gerry; Brian Caldwell
Subject: RE: OU 2 Site 11 white paper

Team, I have reviewed the "white paper" and have the following comments on it:

- (1) Some of the terminology used is pretty subjective. We should probably be a little more precise with the language in those places. For example, I am talking about where it states "low" concentrations of COCs in groundwater are not causing "significant" contaminant migration and COCs appear to have attenuated "significantly". If we could be a little more precise in our language, it might help others understand what our argument is.
- (2) On page 8, third paragraph, it says that the cost of excavating the landfill would be prohibitive. I'm not sure prohibitive is right term to use here. I think it could be argued on cost/benefit basis that it would be very costly with limited benefits as well as having Sustainability arguments against it (cost of moving material from one landfill to another landfill in terms of fuel, vehicle emissions, road wear and tear, fugitive emissions (possibly with asbestos fibers), tree killing, etc.).
- (3) On page 10, last bullet, last sentence, remove one of the "and to".
- (4) On page 10, last sentence on bottom of page, it says "factors are applicable and relevant to Site 11 . . ." This is awful close to applicable or relevant and appropriate language from ARARs. Is this what was meant?
- (5) On page 11, first bulleted item after third paragraph, last sentence, it says that trenching during the RI did not indicate the presence of contaminant mass. Based on what is presented in Table 1, that is incorrect. There it mentions, product, black ooze, strong diesel odor, sheen, black oil/tar oozing, black colored sand seams, green froth on groundwater, visible sheen.
- (6) In Section 2.6, only ARARs should be listed and whether they are applicable or relevant and appropriate. One could stuff some "To Be Considered" in there as well. There shouldn't be any "Not Relevant and Appropriate" or "Not Applicable".
- (7) On page 14, in the State ARARs table, please remove the petroleum contamination cleanup rule, brownfields cleanup rule and the drycleaners cleanup rule as they have all been incorporated into 62-780 as far as I'm aware.
- (8) The ARAR citations should be more precise. Instead of citing an entire rule, find the specific parts of the rule that apply or are relevant and appropriate.
- (9) On page 15, bottom of page, last line, please change Chapter 62-780(2) FAC to Rule 62-780.680(2)(b)1.b., which is the soil cover part of RMO II.
- (10) On page 17, Threshold Criteria, second paragraph, please cite for the cap meeting the Department's leachability ARARs as Rule 62-780.680(2)(b)2.c.
- (11) On page 17, Threshold Criteria, third paragraph, please change Chapter 62-780.680(2) to Rule 62-780.680(2)(b)1.b., which is the soil cover part of RMO II.
- (12) I have worked on several BRAC bases where asbestos was an issue. However, for asbestos to be an issue, three things had to be true. (1) asbestos had to be present, (2) asbestos had to be friable (breathable fibers) and (3) asbestos had to be available for people to come into contact and breath it. As I understand what the Navy is doing, by ensuring there is two feet of cover, the availability to the asbestos is removed and risks from it is abated.

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From: Sam.Naik@CH2M.com [mailto:Sam.Naik@CH2M.com]

Sent: Friday, March 28, 2014 4:23 PM

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Subject:

Tim and Dave-

On behalf of the Navy, please find attached (Part 1 of) the interim document (“white paper”) detailing a rationale and comparative analysis for a containment remedy for Site 11, OU2, NAS Pensacola. This document was prepared per the outline discussed with you by the Navy.

Much appreciate a quick review and your comments and feedback on this document, we will incorporate changes immediately upon receiving your feedback.

Part 2 of the file follows shortly.

Thanks and have a great weekend!

Sam

