

N00204.AR.004655
NAS PENSACOLA
5090.3a

LETTER REGARDING REVIEW AND COMMENTS FROM FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION OF DRAFT REMEDIAL ACTION PLAN ADDENDUM
REVISION 1 FOR UNDERGROUND STORAGE TANK SITE 25 TOUCH-N-GO SERVICE
STATION NAS PENSACOLA FL

6/20/2014

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

June 20, 2014

Mr. William Neimes
Remedial Project Manager
ITP Gulf Coast
Naval Facilities Engineering Command Southeast
Attn: AJAX Street, Building 135N
Post Office Box 30A
Jacksonville, Florida 32212-0030

RE: Draft Remedial Action Plan Addendum, Site UST 25, Touch-N-Go Service Station,
Revision No. 01, Naval Air Station Pensacola, Pensacola

Dear Bill:

The Department has reviewed the Draft Remedial Action Plan Addendum, Site UST 25, Touch-N-Go Service Station, Revision No. 01, Naval Air Station Pensacola, dated April 2014 (received electronically April 17, 2014), prepared by AGVIQ-CH2M HILL Constructors, Inc. Joint Venture III. The Remedial Action Plan Addendum proposes to revise the remedial approach at UST Site 25 from bioslurping to monitored natural attenuation (MNA). Bioslurping was the Navy's proposed remedy that was approved by the Department in a Remedial Action Plan Approval Order dated May 9, 2002. Based on my review of the report, it appears that this remedy was never implemented. However, the reasons why the remedy was not implemented are not explained. I have evaluated the proposed MNA remedy and have determined that it does not meet the criteria of Rule 62-780.690, Florida Administrative Code (F.A.C.), as the sole remedy to address petroleum contamination at this site.

The following criteria of Rule 62-780.690, F.A.C., are not met:

- (1) *Free product is not present.* Approximately one-quarter foot of free product was detected in MW-09 in November 2013. Also, the decrease in free product thickness between measurements in 2012 and 2013 may not indicate that the product is being naturally remediated. The decrease may be function of water table fluctuations.
- (2) *Contaminated soil is not present in the unsaturated zone.* Soil samples have not been collected or analyzed since 2001. At that time, some soil had contaminant concentrations above leachability to groundwater soil cleanup target levels. The absence of recent soil data makes it impossible to determine whether the soil cleanup criteria is met.

Mr. William Neimes
Remedial Action Plan Addendum
UST Site 25, Touch-N-Go Service Station
Page 2 of 2
June 20, 2014

- (3) *Contaminants present in the groundwater at concentrations above applicable groundwater cleanup target levels are not migrating beyond the temporary point of compliance.* As stated in the RAPA, plume migration has occurred beyond the original temporary point of compliance (MW-13) although not beyond the newly installed downgradient compliance well. Therefore, the plume is likely migrating and may not have stabilized.
- (4) *The site is anticipated to meet the applicable No Further Action criteria of Rule 62-780.680, F.A.C., as a result of natural attenuation in five years or less.* Free product and groundwater contamination are still present although natural attenuation processes have been in effect at least since the site was originally assessed in 2000. It is unlikely that five more years of letting natural processes clean up the site will result in No Further Action being required.

The Department requests that the current soil contaminant distribution in the vadose zone and smear zone be investigated in conjunction with groundwater monitoring. Depending on the results of this soil investigation, the Department may require that soil contamination be actively remediated. The proposed natural attenuation monitoring recommendations located in Section 3.2 in the RAPA and in Appendix H to the RAPA should be revised to continually confirm the contaminant plume boundary, both downgradient and sidegradient, and to determine what effect seasonal water table fluctuations are having on free product thickness and on groundwater contaminant concentrations in representative wells. Comprehensive groundwater quality measurements across the site should be conducted at least annually.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
DoD and Brownfields Partnerships
Waste Cleanup Program

cc: Greg Campbell, NAS Pensacola
Hector Hernandez, CH2M Hill, Navarre
Allison Harris, Resolutions Consultants
Gerry Walker, Tetra Tech, Tallahassee

KAW

