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NAS PENSACOLA  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW AND COMMENTS ON DRAFT INTERIM REMEDIAL ACTION COMPLETION  
REPORT OPERABLE UNIT 4 SITE 15 PESTICIDE RINSATE DISPOSAL AREA NAS  
PENSACOLA FL  
9/9/2013  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

044



**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

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RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

September 9, 2013

Ms. Patty Marajh-Whittemore  
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 Interim Remedial Action Completion Report, OU 4 – Site 15, Pesticide Rinsate Disposal Area, Naval Air Station Pensacola, Pensacola

Dear Patty:

The Department has reviewed the Draft Interim Remedial Action Completion Report, OU 4 – Site 15, Pesticide Rinsate Disposal Area, Naval Air Station Pensacola, dated May 2013 (received May 8, 2013), prepared by Resolution Consultants. I have the following comments:

- (1) The report in Table 2-1 and on page 5, bottom paragraph, incorrectly cites 3.1 mg/kg as the remedial action objective for arsenic to be protective of the industrial user that was presented in the Record of Decision (ROD) for the site. The ROD actually cited a concentration of 3.7 mg/kg as the remedial action objective for arsenic (Table 7-1 of the ROD). Please note that this cleanup number for arsenic in soils has been adjusted several times as cited in CH2M Hill Constructors, Inc.'s, Interim Remedial Action Report (April 2006). The ultimate cleanup appears to have achieved levels below the Department's current arsenic industrial soil cleanup target level of 12 mg/kg, but not levels at or below 3.1 or 3.7 mg/kg, based on what is presented in the Interim Remedial Action Report.
- (2) In Section 5.0, page 9, please identify that land use controls for soil will be maintained within the boundaries of the site indefinitely, or until all parties agree that soil contamination is at levels that allow for unlimited use and unrestricted exposure. Currently, the paragraph only mentions land use controls for groundwater.

Ms. Marajh-Whittemore  
Draft Interim Remedial Action Completion Report  
Operable Unit 4, Site 15  
Page 2 of 2  
September 9, 2013



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

CC: **Greg Campbell, NAS Pensacola**  
**Tim Woolheater, EPA Region 4**  
**Gerry Walker, Tetra Tech, Tallahassee**  
**Allison Harris, Ensafe, Memphis, TN**