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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT FEASIBILITY STUDY FOR OPERABLE UNIT 16 SITE 41
WETLANDS NAS PENSACOLA FL
06/30/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Ms. Patty Marajh-Whittemore
Department of the Navy
Naval Facilities Southeast
Attn: Ajax Street, Building 135N
P.O. Box 30A
Jacksonville, Florida 32212-0030

RE: Draft Feasibility Study for Operable Unit 16, Site 41 Wetlands, Naval Air Station
Pensacola, Pensacola, Florida.

Dear Patty:

The Department has reviewed the Draft Feasibility Study for Operable Unit 16, Site 41 Wetlands, Naval Air Station Pensacola, dated December 2010 (received December 30, 2010), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the document:

- (1) While I concur with the remedies selected for evaluation in the Feasibility Study, I am finding it difficult in determining the need for implementation of an active remedy like sediment excavation or dredging vs. the act of sediment monitoring. The problems I am having conceptually are that:
 - a. The laboratory analytical data for sediment samples is in most cases quite old. As an example, on Figure 2-1, the Wetland 3 data appears to have collected in 1994, 1995 and 1997. The current state of the wetlands is likely unknown. Storm events that have occurred since the last samples were collected may have buried contamination under cleaner sediments, it may have uncovered more contaminated sediments, it may have redistributed the contaminants within the wetland, or it may have transported contaminated sediments to another wetland or Bayou Grande.
 - b. For some wetlands, the data collected appears quite sparse and areas depicted in figures in Section 2 for some wetlands as being either an area of concern (AOC) based on human health or based on ecological concerns do

- sediment contamination that appear to have little to no data to support it. See for instance page 3-14, Section 3.2.5.2, last paragraph which specifies 6 inches or page 4-16, Section 4.2.4.1, Component 2: Excavation, which specifies excavation or dredging to an **assumed** depth of 1 foot.
- d. For sediment monitoring to be a viable alternative, **terrestrial sources of contamination** that may continue to be transported and deposited in the wetlands need to be eliminated. This is made difficult in that the wetlands sites have been separated from the Operable Units that may be affecting them. For instance, Operable Unit 2 (OU 2) consists of several sites that may affect Wetlands 5A/5B, 6 and 64. In addressing soil contamination to be excavated from OU 2, the effects of those contaminants in soil on the adjacent wetlands was not evaluated, Remedial Action Objectives were not identified or calculated for the soil to sediment pathway, and excavation boundaries for OU 2 were specifically stopped at a wetland's boundary with the understanding that it would be addressed by the Site 41 Wetlands site.
 - e. The excavation grids in Section 4 would appear to be based on arbitrary boundaries not always supported by analytical data. See comment (1)b.

(2) I have the following editorial comments on the Draft Feasibility Study report:

- a. Section 2.2 is missing. See 2-15 and Table of Contents.
- b. On page 2-1, Section 2.1, second paragraph, third bullet, it says there are no location-specific ARARs for Site 46. First, it should be Site 41. Second, as wetlands are a primary example of an area with location-specific ARARs, this statement is obviously erroneous.
- c. On page 4-14, Section 4.2.3.2, Compliance with ARARs, there is no discussion regarding chemical-specific ARARs or TBCs.
- d. SED-4 is ex-situ treatment consisting of the excavation and off-site disposal of sediments. However on page 4-25, Section 4.2.4.2, bottom of the page, it clearly states that SED-4 would not reduce the toxicity, mobility, and volume of contaminants because no treatment would occur. I believe that at least the word "volume" needs to be removed.
- e. Table 5-1 on page 5-7 is truncated. Most of the Table is missing from the page.

natural recovery based on the dates the original sediment samples were collected?

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

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by
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