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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW AND COMMENTS OF DRAFT PROPOSED PLAN FOR OPERABLE UNIT 20 SITE 45  
BUILDING 603 LEAD SITE NAS PENSACOLA FL  
10/01/2010  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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123  
Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi A. Drew  
Secretary

October 1, 2010

Ms. Patty Marajh-Whittemore  
Naval Facilities Engineering Command Southeast  
Post Office Box 30  
Building 903  
Naval Air Station Jacksonville  
Jacksonville, Florida 32212-0030

RE: Draft Proposed Plan for Operable Unit 20, Site 45 - Building 603 Lead Site, Naval Air Station Pensacola, Pensacola, Florida.

Dear Ms. Marajh-Whittemore:

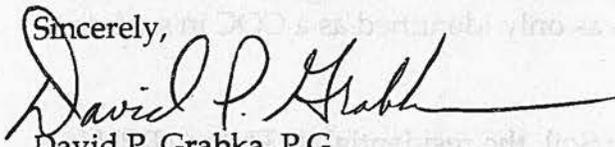
I have completed my review of the Draft Proposed Plan for Operable Unit 20, Site 45 - Building 603 Lead Site, Naval Air Station Pensacola, dated August 2010 (received August 13, 2010), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Draft Proposed Plan:

- (1) On page 5, second column, Human Health Risks, Step 1, it lists out the Chemicals of Potential Concern (COPCs) identified for surface soil, subsurface soil and groundwater. It appears that barium and TRPH have been left off the list for surface soil and barium has been left off the list for subsurface soil. These contaminants were mentioned as exceeding the Department's SCTLs in other parts of the Proposed Plan and were identified as becoming chemicals of concern (COCs) on page 7, first column.
- (2) On page 5, first column, second bullet, the leachability to groundwater SCTL for TRPH is 340 ppm.
- (3) On page 6, second column, third bullet from the bottom, please place a comma between "workers" and "unacceptable".
- (4) On page 7, first column, in the list of COCs for surface and subsurface soil, TRPH is identified as a COC. I believe TRPH was only identified as a COC in surface soils, not subsurface soils.
- (5) On page 8, first column, in the section on Soil, the residential SCTL for TRPH is 460 ppm and the leachability to groundwater SCTL is 340 ppm.

- (6) On page 8, second column, Soil Cleanup Alternatives, Soil Alternative S-2, first sentence, please change "consists" to "consist".
- (7) On page 9, first column, top paragraph, please change the last sentence to read that the completed treatment and LUCs would partially meet the objectives of RAO 2. This is because cPAHs exceeding industrial SCTLs are not addressed by this soil remedy.
- (8) On page 9, first column, Soil Alternative S-4, second sentence, please remove the word "it".
- (9) On page 11, first column, in the section on Compliance with ARARs, it says location-specific ARARs do not apply to Alternatives S-1, S-2 and S-3. Why would location-specific ARARs apply to Alternative S-4?
- (10) On page 12, first column, Groundwater Cleanup Alternatives, Overall Protection of Human Health and the Environment, middle of the paragraph, please change a sentence to read "LUCs implemented for alternative GW-2 and GW-3 would prevent use of groundwater and would be protective of human health by preventing unacceptable risks from exposure to groundwater until cleanup levels are met."
- (11) On page 12, second column, Long-Term Effectiveness and Permanence, first paragraph, first sentence, please add "are met" to the end of the sentence. In the second paragraph, first sentence, please add the word "and" between the words "plumes" and "would".
- (12) On page 13, second column, second paragraph from the bottom, please change "will brief" the RAB to "has briefed" the RAB and provide the date the RAB was briefed.

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

Ms. Patty Marajh-Whittemore  
Draft Proposed Plan for Site 45  
October 1, 2010  
Page 2

CC: Greg Fraley, EPA Region 4, Atlanta  
Gerald Walker, TtNUS, Tallahassee  
Greg Campbell, NAS Pensacola  
Sam Naik, CH2M Hill, Atlanta

JJC  ESN 