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LETTER REGARDING REVIEW AND COMMENTS FROM FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION OF DRAFT ANNUAL MONITORING REPORT FOR
UNDERGROUND STORAGE TANK SITE 21 BERTHING PIER NAS PENSACOLA FL
8/21/2014
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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HERSCHEL T. VINYARD JR.
SECRETARY

August 21, 2014

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 Annual Monitoring Report for Underground Storage Tank (UST) Site 21 – Berthing Pier,
Naval Air Station Pensacola, Pensacola

Dear Patty:

The Department has reviewed the Draft Annual Monitoring Report for Underground Storage Tank (UST) Site 21 – Berthing Pier, Naval Air Station Pensacola dated February 18, 2013 (received February 18, 2013), prepared by Tetra Tech, Inc. I apologize for the length of time it has taken to provide this response. The report provides groundwater monitoring results over four quarters from November 2010 to August 2011, LNAPL measurements over the same period, and recommends site closure under the Department's Chapter 62-780, Florida Administrative Code (F.A.C.), Risk Management Option (RMO) II, with the seawall at the Berthing Pier substituting for a constructed engineered barrier eliminating contaminant migration to surface water. The Department has evaluated the proposal and finds that the seawall, constructed of interlocked steel sheet piles, does not meet the requirements of an engineering control that prevents the migration of groundwater contaminants and their discharge to Pensacola Bay. Subsection 62-780.680(2)(c)2, F.A.C., states that:

An engineering control that prevents migration of the plume (for example, a permanent containment such as a barrier wall) is implemented, and it has been demonstrated to the Department by a minimum of one year of groundwater monitoring data that groundwater contaminant concentrations at the property boundaries do not, and will not, exceed the appropriate groundwater CTLs specified in subparagraph 62-780.680(1)(c)1., F.A.C., and that the plume has not affected, and will not affect, a freshwater or marine surface water body pursuant to subparagraph 62-780.680(1)(c)2., F.A.C. Periodic monitoring of the engineering control by the PRSR shall be required to verify the effectiveness of the engineering control in preventing migration of the plume. The PRSR shall report to the Department any failures of the engineering control to prevent migration of the plume within 30 days of discovery of a failure. Prior to Department approval of a No Further Action with engineering controls, the PRSR shall provide certification by a registered Professional Engineer that to the best of his or her knowledge the engineering control is consistent with commonly accepted engineering practices, is appropriately designed and constructed for its intended purpose, and has been implemented;

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The seawall was not designed or constructed for the purpose of containing contaminated groundwater and product and preventing their discharge to surface water, detailed engineering design drawings and construction specifications of the seawall were not provided, the seawall is likely not watertight at the steel sheet pile interlocks, the status of the seawall with regard to corrosion is not mentioned, and the seawall has not been certified by a Professional Engineer as being suitable as an engineering control eliminating contaminant migration. For the purpose of evaluating the seawall as a vertical engineered barrier, EPA's *Evaluation of Subsurface Engineered Barriers at Waste Sites*, August 1998, EPA 542-R-98-005, and *Subsurface Containment and Monitoring Systems: Barriers and Beyond (Overview Report)*, March 1999, prepared by Leslie Pearlman, National Network of Environmental Management Studies Fellow, for EPA's Office of Solid Waste and Emergency Response Technology Innovation Office, were consulted. Based on my evaluation, the information provided regarding the seawall does not meet the criteria of Chapter 62-780, F.A.C., as an engineering control preventing the migration of contamination and its discharge to surface water.

Please resume groundwater monitoring as previously approved by the Department. Please also provide a proposal to address petroleum contamination at the site in accordance with either Section 62-780.610, F.A.C., Fate and Transport Model and Statistical Method Requirements, Section 62-780.650, F.A.C., Risk Assessment, Section 62-780.690, F.A.C., Natural Attenuation Monitoring, or Section 62-780.700, Active Remediation.

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
Gerry Walker, Tetra Tech, Tallahassee
Allison Harris, Resolutions Consultants

KAW

