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# EnSafe / Allen & Hoshall

a joint venture for professional services

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NAS PENSACOLA  
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May 26, 1995

U.S. Environmental Protection Agency  
Attn: Ms. Allison Humphris  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Re: Final Proposed Plan  
Site 39, **NAS** Pensacola  
Contract # N62467-89-D-0318/083

Dear Ms. Humphris:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit three copies of the Final Proposed Plan for Site 39 at the Naval Air Station Pensacola in Pensacola, Florida.

If you should have any questions or need any additional information regarding the plan, please do not hesitate to call me.

Sincerely,

EnSafe/Allen & Hoshall

Allison L. Dennen  
*Task Order Manager*

Enclosure

cc: **Bill Hill**, SOUTHNAVFACENGCOM without enclosure  
EnSafe/Allen & Hoshall **CTO** file without enclosure  
EnSafe/Allen & Hoshall file — 1 copy  
EnSafe/Allen & Hoshall Pensacola — 1 copy  
EnSafe/Allen & Hoshall Library — 1 copy  
Ron Joyner, NAS Pensacola — 9 copies  
John Mitchell, FDEP — 1 copy  
Melissa Waters, NOAA — 1 copy  
Phil Crowell, BEI — 1 copy

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
TECHNICAL REVIEW AND COMMENT  
DRAFT PROPOSED PLAN AND RECORD OF DECISION (ROD)  
SITE 39: OAK GROVE CAMPGROUND  
NAVAL AIR STATION (NAS) PENSACOLA  
PENSACOLA, FLORIDA**

**COMMENT 1:**

**Page 2, Paragraph 3:**

- A. The Federal Facilities Agreement **was signed in** October 1990.
- B. The full RCRA permit (both state and EPA portions) addresses **not** only the treatment, storage and **disposal** of **hazardous** materials, and **waste**, but **also** the investigation and remediation of any releases of **hazardous waste** and/or constituents from solid waste management units. **As** seems to be **indicated** in the final sentence of this paragraph, the intent of the FFA is to integrate the Navy's CERCLA **response** obligations and RCRA corrective action obligations, such that the activities completed under the FFA **will** achieve the requirements of both programs.

**RESPONSE**

- A. **Agreed.**
- B. **Agreed.**

**COMMENT 2:**

**Pages 3 through 7, Section 7.0:**

It is misleading to include only a summary of pre-removal **soil** analytical results under the heading "Remedial Investigation Summary". The proposed "no further action" decision for **soils** is based on the post-removal soil analytical results. The pre-removal **soil** analytical results presented here provided the justification for the July 1994 **soils** removal action - not the currently-proposed "no further action." while it may be legitimate to refer to the pre-removal **data as any** early portion of the RI, the **full** RI must include a description of current site conditions (**i.e.** post-removal **soil analytical** results) in order to meet the definition of an **RI**. Ideally, the pre-removal site information, the removal action itself, and the post-removal site information should be presented in chronological order in a "Site Background" **section**.

**RESPONSE:**

**Agreed.** A chronological order of the site information has been added to the Site Background Section.

**COMMENT 3:**

**Page 6:**

It would be helpful to include a **glossary** in the Proposed Plan which defines terms such as "PRGs" and "drinking water standards", that the general public **is not likely to be familiar** with.

**RESPONSE**

**Agreed.** A glossary has been added as Appendix A.

**COMMENT 4:**

**General Comment:**

The "Summary of Site Risks" section should be preceded with a section entitled "Scope and Role of Operable Unit Response Action", which summarizes the lead agency's rationale and strategy for **remediating** the site (e.g. no further action proposed for all **media**; final action for the **site**).

**RESPONSE:**

**Agreed.**

**COMMENT 5:**

**Pages 7 through 8, Section 4.0:**

- A. The first paragraph should clearly **state** that it addresses **site risks** for **soils**.
- B. The second paragraph should clearly **state** which COPCs and COCs were **identified** for groundwater.
- C. The description of **ecological risks** **seems to** contradict earlier statements regarding the current extent of **soil contamination** at the **site**. **See also**, the text pertaining to assessment of **ecological risk** in paragraph three of the Executive **Summary**.

**RESPONSE:**

- A. **Agreed.**

B. *Agreed.*

C. The ecological risk description has been revised.

**COMMENT 6:**

**Pages 8 through 9, Section 5:**

**This Section should be placed earlier in the document, in the section entitled "Site Background".  
See comment #2 above.**

**RESPONSE:**

***Agreed.***