

Department of
Environmental Protec

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Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, florida 32399.2400

Virginia B. Wetherell
Secretary

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November 17, 1995

CERTIFIED MAIL
RETURN RECEIPT REOUESTED

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NAS PENSACOLA
5090.3a

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Final Focused Feasibility Study, OU 10, NAS Pensacola

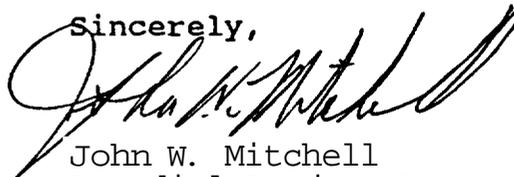
Dear Mr. Hill:

I have completed the technical review of the above referenced document dated October 26, 1995 (received October 30, 1995). I can approve the document as final based upon the attached comments and certification of Mr. Gregory Brown. I have also attached a copy of our most recent information from Chapter 61G15-23, F.A.C. which indicates requirement of a metal-type impression seal.

Also, after reviewing F.R. 300.430, I am in agreement with Mr. Brown that site specific risk based cleanup concentrations are not ARARs. F.R. 340.430 [e][2][i][A][2] states that the 1E-6 "risk level shall be used as a point of departure for determining remediation goals for alternatives when ARARs are not available."

If I can be of any further assistance with this matter, please contact me at (904) 921-9989.

Sincerely,



John W. Mitchell
Remedial Project Manager



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 14, 1995

CERTIFICATION OF APPROVAL

RE: Final Focused Feasibility Study; Operable Unit 10;
Pensacola, Florida; Submitted by Ensafe/Allen & Hoshall,
Memphis, Tennessee.

Operable Unit 10 consists of sites undergoing investigation and remedial action under the federal Comprehensive Environmental Response, Compensation, and Liability Act, as amended. The proposed remedial actions are responses to reduce pollutants in groundwater and soil.

In my professional judgment, the engineering features described in the engineering document, Final Focused Feasibility Study; Operable Unit 10; Pensacola, Florida, provide reasonable assurance of reducing applicable pollutants below quantities which may be potentially harmful or injurious to human health or welfare and animal or plant life in accordance with state criteria authorized by Chapter 376, F.S.

I have not evaluated and do not certify aspects of this plan that are outside the limits of my review responsibilities and outside my area of technical expertise (including but not limited to electrical, mechanical, and structural features). I personally completed this review.


Gregory M. Brown, P.E.
Professional Engineer No. 42194
Expires February 28, 1997

Nov 17, 1995
Date

copy 1 of 2
Enclosure (1)

Memorandum

Florida Department of Environmental Protection

TO: John Mitchell, Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section }

FROM: Greg Brown, P.E., Professional Engineer II, *JB*
Technical Review Section

DATE: November 14, 1995

SUBJECT: Final Draft Focused Feasibility Study; OU 10 FS; NAS Pensacola, Florida

I reviewed the subject document dated October 26, 1995 (received November 14, 1995). The document is adequate for its intent. There are two minor comments, however, that I am mentioning for the record. The first concerns the Navy's contention that site-specific risk based cleanup criteria are **ARARs**. I believe CERCLA and the NCP describe **ARARs** as promulgated federal or state environmental or facility siting standards, while site-specific risk-based criteria are not. The second comment concerns the requirement for an impression-type metal seal for engineering certifications in accordance with Chapter 61615-23, F.A.C. The engineering certification in this feasibility study appears to be sealed with an ink-type rubber stamp.

These are minor comments that I hope the Navy will address in future feasibility studies and engineering documents. These exceptions do not detract from the final conclusions of this feasibility study. My Certification of Approval is attached. I have included two copies of the Certification of Approval for the Navy's files and the facility's administrative record. Please request the Navy to place a copy of these certifications and the original signed and sealed copies of the subject engineering document into the administrative record. If you have any questions, please call me at (904) 488-3935.

encl (2)

CHAPTER 61G15-23
SEALS

- 61G15-23.001 Seals Acceptable to the Board.
- 61G15-23.002 Seal, Signature and Date Shall Be Affixed.

61G15-23.001 Seals Acceptable to the Board.
 (1) Pursuant to 472.025, F. S., the Board hereby establishes as indicated below the forms of metal-type impression seals which are acceptable to the Board:



(2) The type of seal on the left may be used only by registrants who are registrants in good standing under both Chapter 471 and Chapter 472. F. S. Specific Authority 472.025 FS. Law Implemented 472.025 FS. History—New 1-8-80, Amended 6-23-80, Formerly 21H-23.01, 21H-23.001.

61G15-23.002 Seal, Signature and Date Shall Be Affixed.

(1) A professional engineer shall sign his name and affix his seal to all plans, specifications, plats, reports, or other documents prepared or issued by said registrant and being filed for public record. The date that the signature and seal is affixed as provided herein shall be entered on said plans, specifications, plats, reports, or other documents immediately under the signature of the professional engineer.

(2) Each sheet of plans and prints which must be sealed under the provisions of Chapter 471 shall be sealed, signed and dated by the professional engineer in responsible charge. A cover or index sheet for engineering specifications may be used and that sheet must be signed, sealed and dated by those professional engineers in responsible charge of the production and preparation of each section of the engineering specification with sufficient information on the cover sheet or index so that the user will be aware of each portion of the

specifications for which each professional engineer is responsible. Engineering reports must be signed, sealed and dated on a signature page or cover letter by each professional engineer who is in responsible charge of any portion of the report. A professional engineer may only seal an engineering report, plan, print or specification if that professional engineer was in responsible charge of the preparation and production of the engineering document and the professional engineer has the expertise in the engineering discipline used in producing the engineering document in question.

(3) A professional engineer should not seal original documents made of mylar, linen, sepia or other materials which can be changed by the entity with whom such document(s) are filed unless the professional engineer accompanies such document(s) with a signed and sealed letter making the receiver aware that copies of the original document as designed by the professional engineer have been retained by the professional engineer and that the professional engineer will not be responsible for any subsequent changes to the reproducible original documents.

Specific Authority 471.025 FS. Law Implemented 471.025 FS. History—New 1-8-80, Amended 1-20-85, Formerly 21H-23.02, Amended 5-14-86, Formerly 21H-23.002.