



EnSafe  **Allen &**

a joint venture for professional

5720 Summer Trees Dr. Suite 8 Memphis, TN 38134
(901) 383-9115 Fax (901) 383-1743

32501.032
09.01.32.0039

N00204.AR.001074
NAS PENSACOLA
5090.3a

January 26, 1996

Florida Department of Environmental Protection

Attn: John Mitchell

Twin Towers Office Building

2600 Blair Stone Road

Tallahassee, Florida 32399-2400

Re: **Transmittal** of Documents
Final Focused Feasibility Study
Operable Unit 10, NAS Pensacola
Contract # N62467-89-D-0318/CTO-048

Dear Mr. Mitchell:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit two copies of the **Final Focused Feasibility Study** for Operable Unit 10 at the Naval Air Station Pensacola in Pensacola, Florida. Response to comments are also included with this document. This document replaces the previously submitted *Final Focused Feasibility Study for Operable Unit 10* submitted on October 26, 1995.

Please let me know if you have any questions or comments regarding the report.

Sincerely,

EnSafe/Allen & Hoshall

Henry H. Beiro
Task Order Manager

Enclosure

cc: Mr. Bill Hill, SOUTHNAVFACENGCOM without enclosure
Mr. Tom Moody, FDEP — NW District without enclosure
Ms. Pat Kingcaid, FDEP without enclosure
EnSafe/Allen & Hoshall file without enclosure
EnSafe/Allen & Hoshall Pensacola file without enclosure
EnSafe/Allen & Hoshall CTO file 048 without enclosure
Kim Reavis, Code 0233KR without enclosure

TECHNICAL REVIEW AND COMMENTS
FINAL FOCUSED FEASIBILITY STUDY: OU 10 FS
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMENT:

1. The Navy's contention is that site-specific risk based cleanup criteria **are** ARARs. CERCLA and the NCP describe ARARs as promulgated federal or **state** environmental or facility siting standards while site-specific risk based criteria are not.

RESPONSE:

Agreed. **This** comment **will** be addressed in future feasibility studies.

COMMENT:

2. **An** impression-type **metal** seal for engineering certifications is required in accordance with Chapter 61G15-23, **F.A.C.**

RESPONSE:

Agreed. A metal impression-type professional engineer **seal** has been included in the FFS **errata**.

COMMENT:

3. The addition of a list of ARARs, the removal of **soil and** groundwater monitoring from the no action alternative **and** the addition of document preparation costs to cost estimates were requested during the December **13-14**, 1995, partnering meeting.

RESPONSE:

These requests have been incorporated into the **FFS**.

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV

COMMENT:

Include ARARs section in the OU 10 FFS

RESPONSE:

Agreed. ARARs have been included in Appendix A of the **FFS**.

COMMENT:

Include how groundwater will be cleaned to meet MCLs through RCRA permit action.

RESPONSE:

Agreed. How the groundwater will be cleaned has been added to Section 2, Assembly of Alternative.

COMMENT:

Revise the "no action" alternative with monitoring to a no action alternative.

RESPONSE:

Agreed. Monitoring in the no action alternative has been deleted from the no action alternative.

U.S. Navy

COMMENT:

Revise the engineering costs to include costs for the Remedial Action Contractor at the following amount. Alternative 1 — no costs, Alternative 2 — \$50,000, Alternative 3 — \$50,000, and Alternative 4 — **\$100,000**. These costs include a site visit by the Remedial Action Contractor and document development.

RESPONSE:

Agreed. The above listed costs have been included.