

Department of
Environmental Protection

32501.032
09.01.32.0046

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 9, 1996

N00204.AR.001136
NAS PENSACOLA
5090.3a

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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: Draft Record of Decision, Operable Unit 10, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced draft Record of Decision (ROD) dated March 8, 1996 (received March 11, 1996). The following comments which have been previously discussed at our partnering meeting need to be addressed.

1. Under the abstract (Item 19) of the Report Documentation Page for Alternative 2, industrial use zoning should be included in the Base Management Plan along with some other form of documented assurance of maintaining this institutional control. What form of assurance has yet to be determined, but hopefully the issue will be resolved in the near future.

Also, the last sentence of the abstract is incorrect in that comments were received and addressed at the public meeting.

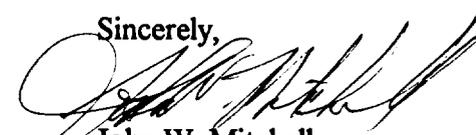
2. Under Section 2.2 (Site History) on page 7, the last paragraph should indicate what year the closure permit was issued for the surge pond.
3. Under Section 5.1 (Nature and Extent of Soil Contamination) on page 14, in the second sentence of the first paragraph for Sites 33 and 35 you should delete "and low concentrations in outlying borings may approximate ambient conditions."
4. Under Section 5.4 (Nature and Extent of Groundwater Contamination) on page 20, the first paragraph should be deleted. Also in the last full paragraph on this page, delete from

the last sentence, "and may be representative of elevated suspended solids."
Hypothesizing is not appropriate in the ROD; just indicate the facts.

5. Under Section 6.4 (Risk Characterization) on page 45, the second paragraph should include a statement that **FDEP** requires action if risk is greater than **1E-6** or the **HQ** is greater than 1.
6. Under Section 7.0 (Description of Remedial Alternatives) the modified RCRA Permit for the groundwater treatment is part of each alternative, not just Alternatives 1 and 2.
7. Under Section 7.2 (Alternative 2: Institutional Controls) on page 2, the defining of the method of instituting and maintaining only industrial use at OU 10 has yet to be resolved (See Comment 1). Once this issue is resolved, the method of instituting these controls will be defined in this section of the ROD.
8. Under Section 8.1.1 (Overall Protection of Human Health and the Environment) on page 64, the first sentence of the subsection, Protection of the Environment, is confusing. It should be written that the Baseline Risk assessment determined there were **no** ecological risks from soil, sediment, surface water, or groundwater. Also in this subsection on page 65, delete the portion in parentheses "(and highly unlikely given the contamination age)."
9. Under Section 8.1.2 (Compliance with ARARs) on page 65, in the second sentence insert "modifying and" prior to the word "enforcing." It should also be noted that the modification to the RCRA recovery system is a part of all the alternatives; not just Alternative 2.
10. Under Section 8.2.1 (Long-Term Effectiveness and Permanence) on page 66, the first sentence of the subsection, Magnitude of Residual Risk, should state that soils present no risk to current or future site workers. Also, the subsection, Adequacy and Reliability of Controls, should include a statement which defines the institutional controls which are yet to be resolved (see Comment 1).
11. Under Section 9.0 (The Selected Remedy), the designation of institutional controls (industrial designation) will have to be redefined once the issue is resolved (see comment 1).

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

Mr. Bill Hill
May 9, 1996
Page 3

cc: Ron Joyner, NAS Pensacola
Jay Bassett, USEPA Region IV
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Allison Dennen, EnSafe, Memphis
Karen Atchley, Bechtel, Knoxville
Tom Moody, FDEP Northwest District
Pat Kingcade, OGC/Trustee File

TJB  JJC  ESN 