



EnSafe / Allen & Hoshall

a joint venture for professional services

32501.032
09.01.32.0047

N00204.AR.001164
NAS PENSACOLA
5090.3a

July 12, 1996

Program Management Office

Shelby Oaks Plaza
5909 Shelby Oaks Dr.
Suite 201
Memphis, TN 38134
Phone (901) 383-9115
Fax (901) 383-1743

EnSafe/Allen & Hoshall Branch Offices:

Charleston

935 Houston Northcutt Blvd.
Suite 113
Mt. Pleasant, SC 29464
Phone (803) 884-0029
Fax (803) 856-0107

Cincinnati

400 TechCenter Dr.
Suite 301
Mason, OH 45150
Phone (513) 248-8449
Fax (513) 248-8447

Pensacola

2114 Airport Blvd.
suite 1150
Pensacola, FL 32504
Phone (904) 479-4595
Fax (904) 479-9120

Norfolk

303 Butler Farm Road
Suite 113
Hampton, VA 23666
Phone (804) 766-9556
Fax (804) 766-9558

Raleigh

5540 Centerview Drive
suite 205
Raleigh, NC 27606
Phone (919) 851-1886
Fax (919) 851-4043

Nashville

311 Plus Park Blvd.
suite 130
Nashville, TN 37217
Phone (615) 399-8800
Fax (615) 399-7467

Irving

10000 North Central Expressway
Suite 100
Irving, TX 75038
Phone (214) 791-3222
Fax (214) 791-0405

Florida Department of Environmental Protection
Attn: John Mitchell
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Draft/Final Record of Decision,
Operable Unit 10, NAS Pensacola
Contract # N62467-89-D-0318/083

Dear Mr. Mitchell:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit two copies of the response to comments and the revised Draft/Final Record of Decision for Operable Unit 10 at the Naval Air Station Pensacola in Pensacola, Florida. Changes to the last version of the document are noted in bold and brackets. Please note that institutional controls have not been defined in **this** version pending resolution from Tier 2.

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

Sincerely,

EnSafe/Allen & Hoshall

Allison L. Dennen
Task Order Manager

Enclosure

cc:.. Patricia Kincade, FDEP without enclosure
Tom **Moody**, FDEP — NW District without enclosure
Bill Hill, Code 1851 SOUTHNAVAFACENGCOM without enclosure
Kim Reavis, Code 0233KR SOUTHNAVAFACENGCOM without enclosure
EnSafe/Allen & Hoshall file without enclosure
EnSafe/Allen & Hoshall CTO 083 file without enclosure
EnSafe/Allen & Hoshall Pensacola file without enclosure
EnSafe/Allen & Hoshall Library

RESPONSE TO COMMENTS
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT RECORD OF DECISION, OPERABLE UNIT **10**, NAS PENSACOLA

COMMENT 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.

RESPONSE:

When resolution on the institutional controls issue is received from Tier **2**, it will be incorporated into the final ROD. The last sentence of the abstract has been revised.

COMMENT 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.

RESPONSE:

Agreed. The change has been made.

COMMENT 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.”

RESPONSE:

Agreed. Change made.

COMMENT 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.

RESPONSE:

Agreed. Change made.

COMMENT 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.

RESPONSE:

Agreed. Change made.

COMMENT 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.

RESPONSE:

Agreed. Change made.

COMMENT 7:

Under Section 7.2 (Alternative 2: Institutional Controls) on page 2, the defining of the method of instituting and maintaining only industrial use of 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.

RESPONSE:

When resolution on the institutional controls issue is received from Tier 2, it will be incorporated into the final ROD.

COMMENT 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),”

RESPONSE:

Agreed. Change made.

COMMENT 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.

RESPONSE:

Agreed. Change made.

COMMENT 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, this subsection, Adequacy and Reliability of Controls, should include a statement which defines the institutional controls which are yet to be resolved (see Comment 1).

RESPONSE:

Agreed. Change made.

COMMENT 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).

RESPONSE:

When resolution on the institutional controls issue is received from Tier 2, it will be incorporated into the final ROD.