

Department of Environmental Protection

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

December 9, 1996

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 Final 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 July 12, 1996 (received July 15, 1996) and provide the following comments.

1. The Declaration of the Record of Decision on page vii indicates that groundwater will be treated through some form of pump and treat system. This is based on the assumption that the modified RCRA Permit will include groundwater treatment. Current efforts are being done to determine if natural attenuation will be allowed under the permit renewal. This would be contrary to the R.O.D.
2. Section 4.0 (Scope and Role of the Operable Unit) discusses active treatment of the groundwater. Please refer to Comment No. 1.
3. Section 6.4 (Risk Characterization) indicates, on page 45, that further evaluation and remedial action would occur if the risk level is greater than 1×10^{-4} . However, it later indicates that the State of Florida does not accept risk greater than 1×10^{-6} . To eliminate this contradiction, I suggest the last full paragraph on page 45 read as follows:

"The USEPA accepts a risk range of 1×10^{-6} to 1×10^{-4} before a response action is required. However, the State of Florida does not accept risk greater than 1×10^{-6} . Therefore, a risk level greater than 1×10^{-6} is evaluated

Mr. Bill Hill
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cc: Ron Joyner, NAS Pensacola
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Tom Moody, FDEP Northwest District
Pat Kingcade, OGC/Trustee File

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