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NAS PENSACOLA
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April 18, 1997

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

Re: 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 Final Record of Decision for Operable Unit 10 at the Naval Air Station Pensacola in Pensacola, Florida.

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 Kingcade, FDEP without enclosure
Tom Moody, FDEP — NW District without enclosure
Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
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**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
RESPONSE TO COMMENTS
DRAFT FINAL RECORD OF DECISION
OPERABLE UNIT 10, NAS PENSACOLA**

Comment 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 ROD.

Response:

The section has been revised to be consistent with the RCRA permit modification.

Comment 2:

Section 4.0 (Scope and Role of the Operable Unit) discusses active treatment of the groundwater. Please refer to Comment No. 1.

Response:

The section has been revised. Please refer to the response to Comment 1.

Comment 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 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 further to determine a remedial action to decrease the estimated risk to acceptable levels.”

Response:

Agreed.

Comment 4:

Table 7 4 (Potential Chemical Specific ARARs) should indicate that Florida Water Quality Standards; Florida Surface Water Standards; Florida Groundwater Classes, Standards, and Exemptions; Florida Drinking Water Standards, Monitoring and Reporting; and Florida Ambient Air Quality Standards are Applicable (A); not just Relevant and Appropriate (R&A).

Response:

Agreed.

Comment 5:

In Section 8.1.1 (Overall Protection of ~~Human~~ Health and the Environment), the second sentence of the third paragraph should be changed to read, "If the leachability study shows that contaminants in soil are adversely impacting groundwater, the contingency excavation remedial action will be implemented." Also, the last sentence of this section at the top of page 71 can be deleted from the text.

Response:

Agreed.

Comment 6:

In Section 8.2.1 (Long Term Effectiveness and Permanence), I do not see how Alternative 4 presents "long-term liabilities" due to disposal at a landfill or treatment facility. These would be permitted facilities. The sentence should read that "Alternative 4 would require disposal of contaminated soil at a permitted landfill or treatment facility."

Response:

The Navy disagrees with your opinion. Even though facilities are permitted, there is always a chance the Navy could be identified as a PRP in the future.

Comment 7:

In Section **8.2.2** (Reduction of Toxicity, Mobility, and Volume Through Treatment), delete the phrase “but would likely reduce contaminants over time” from the second sentence.

Response:

Agreed.

Comment 8:

In Section **8.2.3** (Short Term Effectiveness), I disagree with the first two sentences and recommend they read as follows: “Alternative **2** is expected to have the least short term effectiveness because contamination is left in place. Its effectiveness would be achieved through land use restrictions.”

Response:

Agreed.