

Department of  
Environmental Protection

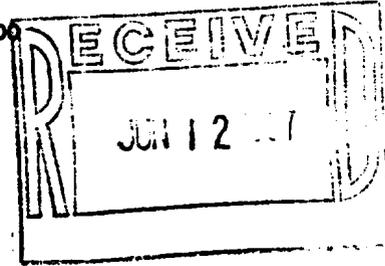
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Lawton Chiles  
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Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

June 5, 1997



**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: Final Record of Decision, Operable Unit 10, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced final Record of Decision (ROD) dated April 18, 1997 (received April 22, 1997) and cannot approve it as final until the following comments are addressed.

Certain portions of the document continue to be too specific on the groundwater treatment rather than being general related to groundwater treatment under the RCRA permit modification and Corrective Action Plan. Specifically:

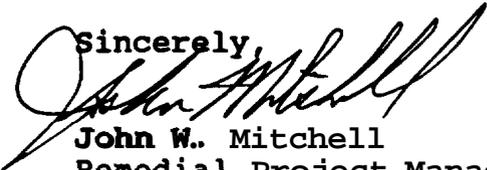
1. In the Declaration of the Record of Decision on page 8, and in Section 4.0 (Scope and Role of the Operable Unit) on page 16:
  - a. In the second bullet, change "remedial design/remedial action/" to "Corrective Action Plan of the."
  - b. In the fourth bullet, delete "upon attainment of the performance standards" in the first sentence. Also, in the second sentence, change "continued attainment of" to "or is progressing toward."
2. In Section 8.1.1 (Overall Protection of Human Health and the Environment) on page 79, change "recovery system" to Corrective Action Plan in the third and fourth paragraphs.
3. In Section 9.1 (Source Control) on page 85, in the last sentence, change "groundwater treatment under the RCRA

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treatment system" to "groundwater remediation under the RCRA Corrective Action Plan."

4. In Section 9.2 (Groundwater Treatment and Monitoring) on page 87:
  - a. Change all instances of "RD/RA" to "Corrective Action Plan."
  - b. In the second bullet, delete "upon attainment of performance standards."
5. Delete Section 9.3 (Extraction, Treatment, and Discharge of Contaminated Groundwater).
6. Rename Section 9.3.1 to read "Performance Standards." Also, in the first sentence of this section, change "shall be treated" to "remediation will continue."
7. Delete Sections 9.3.2 (Discharge Standards), 9.3.3 (Design Standards), and 9.4 (Compliance Testing).
8. In Section 10.2 (Attainment of the ARARs), under subsection Action Specific ARARs on page 92, change the last sentence to read, "All groundwater treatment standards will be met as per the RCRA permit."

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

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

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