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NAS PENSACOLA
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U.S. Environmental Protection Agency
Attn: Ms. **Gena** Townsend
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

Re: Final Proposed Plan
Site 17, **NAS** Pensacola
Contract # N62467-89-D-0318/083

Dear Ms. Townsend:

On behalf of ~~the~~ Navy, EnSafe/Allen & Hoshall is pleased to submit two copies of the Final Proposed Plan for Site 17, Transformer Storage Yard at the Naval Air Station Pensacola in Pensacola, Florida. Responses to USEPA comments are enclosed. FDEP concurred with the March 1997 version. As we agreed in the June 1997 Partnering Meeting, the proposed plan will be submitted to the public in a fact sheet form after funding is secured for the removal action.

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: Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
Ron Joyner, NAS Pensacola - 2 copies
Denise Klimas, NOAA - 1 copy
EnSafe/Allen & Hoshall file - 1 copy
EnSafe/Allen & Hoshall Pensacola - 1 copy
EnSafe/Allen & Hoshall Library - 1 copy
Administrative Record - 1 copy

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV

Response to Comments

Naval Air Station Pensacola

Site 17 (Operable Unit 14) Proposed Plan

Comment 1:

The proposed plan is **missing** some basic statutory requirements which **are** required to be in such plans. Specifically, the proposed plan does not contain **a summary of site risks, a summary of alternatives, an evaluation of the alternatives, a discussion for each alternative of the nine evaluation criteria, and a discussion of ARARs.**

Response:

The proposed alternative **section** has been revised to state that upon completion of the **soil** removal, confirmatory **sampling** and receiving concurrence **from** EPA and Florida, the resulting site conditions will be protective of human health and the environment, Therefore, the recommendation for this site is **“no action”** and the evaluation criteria requirements are not applicable.

Comment 2:

The proposed plan needs further explanation on why **a full** baseline risk assessment was **unnecessary**. Expand on how **a risk threshold evaluation using an** area-weighted analysis is sufficient in lieu of the baseline risk assessment. Include this information **as nontechnically as possible, (this document is for public review).**

Response:

The risk **characterization** summary section has been revised to state that the **USEPA, FDEP** and Navy agreed that a full baseline risk assessment was unnecessary at Site 17. In addition, the **PCB** levels detected are below the **USEPA** residential action level of **10 ppm**.