



EnSafe / Allen & Hoshall

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NAS PENSACOLA
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July 10, 1997

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

Re: Response to Comments
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 on **the Final** Record of Decision for Operable Unit **10** at the Naval Air Station Pensacola in Pensacola, Florida. The changes were incorporated into the **Record** of Decision **dated June 16, 1997**. EPA has **concurred** with document.

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
- EnSafe/Allen & Hoshall file without enclosure
- EnSafe/Allen & Hoshall Pensacola file without enclosure
- EnSafe/Allen & Hoshall Library
- Administrative Record**

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

Comment 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."

Response:

- A. **Agreed. The sentence has been changed.**
- B. **Upon attainment of the performance standards has been deleted from the first sentence of the fourth bullet. The second sentence has been revised to state that "the alternative has achieved the performance standards".**

Comment 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.

Response:

Agreed, The sentence has been changed.

Comment 3:

In Section 9.1 (Source Control) on page 85, in the last sentence, change "groundwater treatment under the RCRA treatment system" to "groundwater remediation under the RCRA Corrective Action Plan."

Response:

Agreed. The sentence has been changed.

Comment 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."

Response:

- A. Agreed. ~~RD/RA~~ has been *changed* to Corrective Action Plan.
- B. The sentence has been revised to state 'alternative ~~has~~ continuously attained the performance standards and remains protective of human health and the environment.'

Comment 5:

Delete Section 9.3 (Extraction, Treatment, and Discharge of Contaminated Groundwater).

Response:

The section has been revised, but not deleted. The section contains the performance standards for groundwater remediation.

Comment 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."

Response:

Agreed. The *changes* have been made. The section number 9.3.1 has been deleted, but the information on performance standards is contained within Section 9.3.

Comment 7:

Delete Sections 9.3.2 (Discharge Standards), 9.3.3 (Design Standards), and 9.4 (Compliance Testing).

Response:

Sections 9.3.2 and 9.3.3 have been deleted. Section 9.4 has been retained and revised to state that groundwater will be monitored in accordance with the Corrective Action Plan for the RCRA permit modification.

Comment 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."

Response:

Agreed. The sentence has been changed.