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LETTER REGARDING TRANSMITTAL OF DRAFT EXPLANATION OF SIGNIFICANT
DIFFERENCES OPERABLE UNIT 10 NAS PENSACOLA FL
5/13/1998
ENSAFE/ALLEN AND HOSHALL



ENSAFE INC.

ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

5724 Summer Trees Drive • Memphis, Tennessee 38134 • Telephone 901-372-7962 • Facsimile 901-372-2454 • www.ensafe.com

May 13, 1998

Commanding Officer
Attn: Mr. Bill Hill, Code 1851
SOUTHNAVFACENGCOM
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Delivery of Report
CTO-083, Proposed Plan and RODs

Reference: Contract # N62467-89-D-0318, CLEAN II

Dear Mr. Hill:

EnSafe Inc. is pleased to submit two copies of the Draft Explanation of Significant Differences, 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 Inc.

Allison L. Dennen
Task Order Manager

Enclosure: Draft Explanation of Significant Difference, Operable Unit 10, NAS Pensacola

cc: Ms. Kimberly Reavis, Code 0233KR SOUTHNAVFACENGCOM without enclosure
EnSafe Inc. CTO 083 file without enclosure
EnSafe Inc. Pensacola file without enclosure
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DRAFT
DECLARATION OF THE EXPLANATION OF SIGNIFICANT DIFFERENCES

Site Name and Location

Operable Unit 10 (Sites 32, 33 and 35), Industrial Wastewater Treatment Plant
Naval Air Station Pensacola
Pensacola, Florida

Statement of Basis and Purpose

The U.S. Navy, as the lead agency, has prepared an Explanation of Significant Differences (ESD) for Operable Unit 10 (Sites 32, 33 and 35) — Industrial Wastewater Treatment Plant, Naval Air Station Pensacola. The ESD is issued under the public participation requirements of Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act, Section 300.435(c)(2)(i) of the National Contingency Plan. The ESD is part of the site's Administrative Record.

The Navy, with concurrence from the United States Environmental Protection Agency (USEPA) and the Florida Department of Environmental Protection (FDEP), selected a remedy for OU 10 with the following elements:

- Excavation and disposal of soil in which contaminants exceed residential soil preliminary remediation goals (Area A)
- Leachability study on Areas B, C, and D to verify that contaminants remaining in soil are not leaching to groundwater
- Contingency remedial action of Areas B, C, and D to include excavation and disposal of soil that the leachability study verifies as a source of groundwater contamination
- The remedial design for groundwater treatment was developed in the Corrective Action Plan for the Resource Conservation and Recovery Act (RCRA) permit modification (Permit HF17-292641 issued 9/26/97)
- Groundwater monitoring program to ensure that the groundwater treatment system will be effective and that contaminants will not migrate
- Continued groundwater monitoring at sampling intervals to be determined during the remedial design for groundwater treatment developed in the Corrective Action Plan for the RCRA permit modification

The groundwater monitoring program was proposed to continue until a five-year review concluded that the alternative had achieved the performance standards and remained protective of human health and the environment. This remedy was presented in the June 1997 OU 10 Record of Decision.

The Navy has considered and adopted a change to the selected cleanup remedy. The modification to the remedy will increase cost-effectiveness, while ensuring protection of human health and the environment. USEPA and FDEP have concurred on the modification to the OU 10 selected remedy.

Description of the Selected Remedy and the Significant Differences

The selected remedy for OU 10 was for soil excavation, with deferral of groundwater treatment to the RCRA program. A five-year review was included in the ROD. Soil excavation has been completed in accordance with the ROD and is documented in the Remedial Action Completion Report.

The significant difference to the ROD is the deletion of the five-year review. The review was included in the ROD to provide for CERCLA oversight of the groundwater cleanup. OU 10 meets the criteria established in 62 FR 62523 to defer the site to the RCRA program. Performance standards for CERCLA were included in the RCRA Corrective Action Plan. The RCRA corrective action would therefore afford equivalent protection to a CERCLA action. Response under RCRA is progressing adequately, and successful completion of the RCRA corrective action would eliminate the need for further cleanup under CERCLA. The public was notified of the proposed deferral, and opposition to the deferral was not encountered. This change will provide cost savings, while protecting human health and the environment.

Statutory Determinations

Considering the changes that have been made to the selected remedy, the Navy, with USEPA and FDEP concurrence, believes the remedy remains protective of human health and the environment, complies with federal and state requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action at the time the original ROD was signed, and is cost-effective.

Captain J.M. Denkler (Commanding Officer, NAS Pensacola)

Date



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May 13, 1998

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

Re: Draft Explanation of Significant Differences
Operable Unit 10, NAS Pensacola
Contract # N62467-89-D-0318/083

Dear Ms. Townsend:

On behalf of the Navy, EnSafe Inc. is pleased to submit two copies of the Draft Explanation of Significant Differences 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 Inc.

Allison L. Dennen
Task Order Manager

Enclosure

cc: Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
Ron Joyner, NAS Pensacola – 2 copies
Tom Dillon, NOAA – 1 copy
EnSafe Inc. file – 1 copy
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May 13, 1998

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

Re: Draft Explanation of Significant Differences,
Operable Unit 10, NAS Pensacola
Contract # N62467-89-D-0318/083

Dear Mr. Mitchell:

On behalf of the Navy, EnSafe Inc. is pleased to submit two copies of the Draft Explanation of Significant Differences 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 Inc.

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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May 13, 1998

Jesse Rigby
125 West Romana Street, Suite 800
Pensacola, Florida 32501

Re: Draft Explanation of Significant Differences
Operable Unit 10
Naval Air Station Pensacola
Pensacola, Florida

Dear Mr. Rigby:

On behalf of the Navy, EnSafe Inc. is pleased to submit one copy of the Draft Explanation of Significant Differences, Operable Unit 10 at the Naval Air Station Pensacola. We look forward to hearing any comments you may have at the next RAB meeting. Please let me know if you have any questions or comments regarding the report.

Sincerely,

EnSafe Inc.

Allison L. Dennen
Task Order Manager

Enclosure

cc: Commander Cruz – 1 copy
Mr. Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
Mr. Harry White, NAS Pensacola – 1 copy
Mr. John Early – 1 copy
Mr. Jerry Westmoreland – 1 copy
Ms. Lisa Minshew – 1 copy
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