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ENSAFE INC.

ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

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June 7, 1999

N00204.AR.001773

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

NAS PENSACOLA  
5090.3a

Re: Final Record of Decision,  
Operable Unit 6 (Sites 9 and 29), NAS Pensacola  
Contract # N62467-89-D-0318/083

Dear **Mr.** Fugitt:

On behalf of the Navy, EnSafe Inc. is pleased to submit two copies of the Final Record of Decision for Operable Unit 6 (Sites 9 and 29), 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. Harris  
**Task Order Manager**

Enclosure

cc: Patricia Kingcade, FDEP - without enclosure  
Tom Lubozynski, FDEP - NW District without enclosure  
Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure  
EnSafe Inc. file without enclosure  
EnSafe Inc. Knoxville file without enclosure  
EnSafe Inc. library without enclosure  
Administrative Record

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
RESPONSE TO COMMENTS  
DRAFT FINAL RECORD OF DECISION  
OPERABLE UNIT 6  
NAS PENSACOLA

**Comment 1:**

Due to residential Soil Cleanup Target Levels being exceeded at Site 9 for benzo(a)pyrene, the Florida Primary Drinking Water Standard being exceeded for cyanide in one well, and the Secondary Drinking Water Standard being exceeded for iron and manganese, I recommend institutional controls to restrict the area of Site 9 to non-residential use and that the groundwater be restricted from use at the operable unit. Also, as the state cannot extend a permanent variance for the drinking water standard, monitoring of the groundwater in the area of the cyanide exceedance will be needed. To eliminate this possibility, it may be beneficial to take another round of groundwater samples in the area of the cyanide exceedance to determine if it was an anomaly.

**Response:**

As agreed by the Tier 1 Partnering Team in February 1999, the isolated benzo(a)pyrene and arsenic exceedances in surface soil have been covered by at least two feet of fill and a road. Therefore, the pathway is no longer complete. The detected concentrations in soil are below leachability criteria, therefore the concentrations are protective of groundwater. Groundwater was resampled in the area of the cyanide exceedance, and cyanide was detected (5.2 ppb) below the drinking water standard (200 ppb). Iron concentrations were below NAS Pensacola reference concentrations in all but one groundwater sample. Monitoring wells downgradient of the reference concentration exceedance were below the reference concentration suggesting that the iron exceedance is not widespread in the OU 6 area. In addition, USEPA indicated in the June 25, 1997 *Summary of TQM Contractor Meeting* email, iron's Reference Dose (RfD) is not a proper RfD. In accordance with this guidance, iron should be addressed in the uncertainty section, if at all. Consequently, iron is not considered COPC and does not contribute to risk. The hazard-based RGO based on a hazard quotient of 1 for manganese is 78 ppb, which is only slightly greater than the ARAR of 50 ppb. Therefore, the Navy is proceeding with the No-Action Record of Decision.