



ENVIRONMENTAL AND SAFETY DESIGNS, INC.

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NAS PENSACOLA  
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October 31, 1997

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

**RE:** Site 1 Focused Feasibility Study Addendum, Contract # **N62467-89-D-0318/0059**

Dear Mr. Mitchell:

On behalf of the Navy, EnSafe Inc. is pleased to submit two copies of the Site 1 Focused Feasibility Study Addendum, at Naval Air Station Pensacola, Florida. Also, a final response to comments is provided to facilitate the review process. If you should have any questions or need any additional information regarding this document, please do not hesitate to call me.

Sincerely,

EnSafe Inc.



Henry H. Beiro, P.E.  
Task Order Manager

Enclosure

cc: Bill Hill, SOUTHNAVFACENGCOM – 2 copies  
Ron Joyner, NAS Pensacola – 2 copies  
Gena Townsend, USEPA – 1 copy  
Tom Dillon, NOAA – 1 copy  
Linda Boldyreff, John C. Pace Library – 1 copy  
Judeth Walker, NAS Pensacola – 1 copy  
EnSafe Inc. File – 1 copy  
EnSafe Inc. Library – 1 copy  
EnSafe Inc. Pensacola – 1 copy

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
FOCUSED FS ADDENDUM, SITE 1, NAS PENSACOLA, FLORIDA**

(Comments from Greg Brown, P.E. dated July 28, 1997)

**COMMENT:**

1. The Alternatives are inspired by the violation of a surface water standard by a single chemical stressor (**i.e.**, iron). The ERA summary in the subject document did not report any actual or potential ecological effects or any assessment endpoints describing the ecological entities and values threatened by the stressor.' It **may be** useful **to** quantify the ecological effects of the observed stressor via field observations and bioassays. Alternatives could be chosen in the context of explicit ecological assessment endpoints.

**RESPONSE:**

The Florida Department of Environmental Protection representative to the Tier I partnering team has indicated that any exceedance of a state surface water quality standard for iron will require action. The addendum now reflects the interception of groundwater exceeding iron surface water quality standards before it enters Wetland 3 and treats it prior to discharge.

**COMMENT:**

2. Alternative 2 will modify the functions of Wetland 3 for wastewater treatment of landfill leachate. Construction and operations would destroy other wetland **values** such **as** wildlife habitat. The alternative proposes off-site mitigation using wetland, preservation to compensate for these losses. Wetland preservation, however, is not typically **used** for mitigation except in special circumstances. Preservation may be desirable when the preserved wetland offers unique values and is threatened by development. Preservation may also be acceptable if the preserved wetland helps to achieve goals of a watershed management plan if one exists. The Navy should therefore consider other forms of compensatory mitigation such **as** on-site restoration or enhancement. Discussions with the Mobile District ACOE and NW District FDEP may help refine the options.

**RESPONSE:**

The Tier I partnering team has agreed that mitigation is a negotiated penalty that has no relation to the decision process for the FFS and it will therefore be removed from discussion in the Site 1 FFS Addendum. Because mitigation is being removed from the addendum, this comment is no longer applicable.

**COMMENT:**

3. If site conditions permit, site grading and hydroperiod control using an outlet structure at the culvert may achieve the same results as the proposed dike system described in Alternative 2. The wetland geometry and flow regime could be modified to enhance iron retention in Wetland 3 while enhancing other wetland functions. Consultation with a competent wetland scientist may be useful.

**RESPONSE:**

Comment noted. The design of any wetland modification will be refined during the remedial design phase of the project if Alternative 2 is selected in the proposed plan and record of decision.