



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 3036532501.005
03.01.05.0003N00204.AR.000835
NAS PENSACOLA
5090.3a

DEC 05 1994

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: Draft Preliminary Site Characterization Report: Site 5
NAS Pensacola, Florida;
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) has completed its review of the Draft Preliminary Site Characterization Report for Site 5 (Borrow Pit). Our comments are enclosed. EPA will consider this report for approval and finalization upon receipt of a revised version which adequately addresses our enclosed comments.

Please contact me at (404)347-3555, extension 6441 if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Allison D. Humphris", is written over a printed name.

Allison D. Humphris, RPM
Department of Defense Remedial Section
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS, Pensacola
David Clowes, FDEP
Henry Beiro, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENTS
DRAFT PRELIMINARY SITE CHARACTERIZATION REPORT: SITE 5
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS :

1. EPA is in agreement with the Navy's conclusion that "no further action is warranted at this site based on the concentrations of detected parameters." Provided our enclosed comments are adequately addressed in the next revision of this document, EPA will consider the document, and the Navy's proposal to eliminate Site 5 from further consideration, for final approval.

2. Throughout the document, the contaminants detected in ground water are compared to risk based concentrations (RBCs), the reference standard, and the Florida Primary Drinking Water Standards (FPDWs). Concentrations detected in ground water should be compared to the Federal Maximum Contaminant Level (MCLs) and the FPDWSS, since these are the numbers that the facility must comply with for ground water.

3. Soil concentrations are compared to the 'reference standard' and RBCs. These numbers are not appropriate for determining whether contaminant concentrations pose a potential risk via leaching to ground water. Therefore, unless the Navy can provide alternate justification for concluding that observed contaminant levels do not present a threat to groundwater, Soil Action Levels (SALs) must be calculated for the contaminants detected at the site in order to evaluate this potential.

SPECIFIC COMMENTS:

1. Pages 2-1 to 2-5, Section 2.2.2:

If the investigation of UST Site 3221NE included any metals analyses (e.g. lead) that data should be presented and discussed in this section.

2. Page 2-3, Figure 2-2:

Please revise this figure to include the meaning of all symbols in the legend.

3. Page 7-1, Section 7.1:

While detected concentrations in the current soil background samples appear low, the number of soil background samples collected is extremely limited (18 samples from 2 geographically proximate soil borings) and therefore may not be representative of conditions throughout the base. As discussed at the November 1994 RPM meeting, EPA recommends that the Parties work together to develop a more representative set of soil background values for NAS Pensacola.

Given the low concentrations detected in downgradient samples at Site 5, it will not be necessary to determine new reference concentrations in order to support the "No Further Action" recommendation for this site. However, suitable reference concentrations must be developed for all future sites at which detected contaminant concentrations are not low enough to clearly support a recommendation for "No Further Action". It is important that this issue be resolved in the near future, due to its potential impact on the finalization of forthcoming screening and Remedial Investigation Reports.

4. Page 7-3, Table 7-1:

Please revise this table to more clearly indicate that the "mean reference concentrations" provided for antimony, mercury, and silver are theoretical values equal to one-half of the IDL, not actual detected concentrations (e.g. include the final sentence provided in this table as a footnote "c", and flag each of appropriate values in the table with a "c").

5. Page 7-7, Paragraph 1:

The reference ground water sample results must be provided in this document. Also, the most recent analytical results obtained for these reference wells (July-August 1994) must be used.

6. Pages 9-2 through 9-3, Section 9.3:

The term "receptors" is generally used in a Baseline Risk Assessment with respect to people, plants and animals potentially affected by site contaminants. To avoid confusion, a different term (e.g., affected media, affected areas) should be used to refer to media or areas affected by site contaminants.