



UNITED STATES ENVIRONMENTAL PROTECTION

REGION 4

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

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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 14  
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 14 (Dredge Spoil Fill Area). 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,

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

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV  
TECHNICAL REVIEW AND COMMENTS  
DRAFT PRELIMINARY SITE CHARACTERIZATION REPORT  
SCREENING SITE 14 (DREDGE SPOIL FILL)  
NAVAL AIR STATION (NAS) PENSACOLA, FLORIDA

1. Abstract and Executive Summary:

These sections should be rewritten for clarity. In particular, each paragraph which presents and evaluates analytical results should clearly specify (i) the sample media being discussed, and (ii) the standard(s) to which the results are being compared and rationale for selection of those standard(s) (particularly if sample results for a given media are being compared with more than one set of standards).

2. Pages 6-1 through 6-48, Section 6:

The data presentation is well thought out, organized and presented. Figure quality is excellent.

3. Page 6-5, Section 6.1:

"The preliminary health risk evaluation considered the material as soil and sediment...because the basins are periodically dry and represent a potential soil pathway." For the reason stated, the results obtained for these samples should have been compared to both the Region IV sediment screening values and the Region III risk-based screening concentrations in this section.

4. Page 8-3, Current and Potential Receptors:

The term receptors should be applied only to the organisms being affected by the impacted media, not the media itself. Please revise the terminology appropriately.

5. Page 9-2, Paragraph 3:

The validity of the conclusions presented in this paragraph are suspect, based on inaccuracies and inconsistencies noted in the Preliminary Risk Assessment (see below comments).

6. Appendix D, Page 1, Paragraph 1:

"Site characteristics would not be expected to encourage frequent trespass or recreational use." This site could be a highly desirable attraction for a trespassor. Also, the Navy had at one time considered turning it into a recreational area. Please revise this statement, as well as the first two sentences of Paragraph 2 on page 2, appropriately.

7. Appendix D, Page 1, Paragraph 3:

Why was the initial screening comparison against Florida CGs (included in previous drafts of this document) omitted from this revision?

8. Appendix D, Page 3:

The following statements appear to directly conflict with the results presented in Tables 7 and 8 (pages 14-15):

"The maximum concentrations [in sediments] of arsenic, beryllium and benzo(a)pyrene were found to exceed the occupational sediment SUSRBC."

"...the lifetime-weighted average (carcinogenic) recreational SUSRBCs [for surface water] for...heptachlor epoxide were exceeded. Maximum concentrations also exceeded the hazard-based child recreational SUSRBCs [for surface water] for mercury and thallium."

"The worker carcinogenic SUSRBCs [for surface water] were exceeded for...heptachlor epoxide, dieldrin and gamma-chlordane. Maximum concentrations also exceeded the hazard-based site worker SUSRBCs for mercury and thallium."

The reviewer was also unable to reproduce the corresponding ILCRs and non-carcinogenic hazard indices presented in the text using the values contained in the associated tables. It is therefore uncertain whether the values and results presented in the text, the tables, or both are incorrect. Consequently, the conclusions drawn from these results regarding the identification of COCs and the need for performing a full Baseline Risk Assessment must also be considered suspect.

9. Appendix D, Page 10, Table 3:

A. Assuming an exposure frequency of "weekends" for the recreational scenario, the exposure duration should be increased from 52 to 104 days/year.

B. The exposure duration of 12 years used for the child in this table is inconsistent with the child age of "1-6" provided in Figures 1 and 2. Please clarify.

10. Appendix D, Pages 11, 14 and 15:

Tables 4, 7 and 8 include numerous footnotes which were not utilized in these tables. Please make the appropriate changes.

11. Appendix E, Page 9, Exposure Scenario:

Since the nearby wetlands have potentially been impacted by this site, this subsection should also include an initial evaluation of ecological risk to wetlands based on potential contaminant migration pathways (e.g. surface water runoff or groundwater discharge).