

32501.038  
04.01.38.0002



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, S.W.  
ATLANTA, GEORGIA 30303-3104**

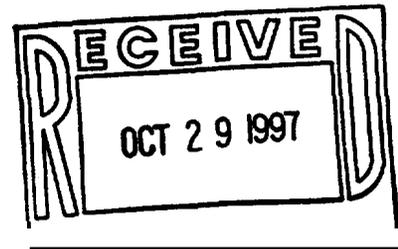
N00204.AR.001549  
NAS PENSACOLA  
5090.3a

October 24, 1997

4WD-FFB

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

commanding Officer,  
Southern Division, NAVFACENCOM  
Attn: Mr. Bill Hill (code 1851)  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010



SUBJ: Focused Feasibility Study  
Sites 38  
Naval Air Station Pensacola  
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has partially completed the review of the above subject document, dated September 8, 1997. Comments are enclosed.

If you have any questions please contact me at (404) 562-8538.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gena D. Townsend".

**Gena D. Townsend  
Senior Project Manager  
Federal Facilities Branch**

Enclosure

cc: Ron Joyner, NAS Pensacola  
Henry Beiro/Brian Caldwell, Ensafe, Pensacola  
Allison Dennon, Ensafe, Memphis  
John Mitchell, FDEP

## 10 GENERAL COMMENTS

1. Section 2.1.1.2, Page 2-8, Paragraph 3 states that most contaminant exceedance was less than one order of magnitude greater than PRG present in one or two isolated borings, suggesting no significant subsurface contamination source. The text also states in the above text that concentrations at or near the PRG will likely not be a threat to groundwater unless presented extensively in subsurface soil (i.e. significant mass is present and available for leaching). However, the remediation of subsurface soil does not depend on order of magnitude greater than PRG or the area of contamination. The question is whether the subsurface soil poses a risk which exceeds the acceptable level. The text has not presented supporting facts that the soil will not continue to be a source for groundwater contamination. There is no reference about the leaching study. Also the text should support that the covering at the site is acting as a barrier to retard surface water percolation, and is structurally sound. In addition, the text should show that groundwater fluctuation will not fluctuate on a seasonal basis to come in contact with the source to have an impact on groundwater. These questions should be incorporated into the body and conclusion of the text. This comment also applies to Site 604.

2. Section 2.1.2.1, Page 2-18, Paragraph 1 states that the area of concern for lead concentration is delineated by three borings at Building 604, and these areas will be assessed further. However, the text does not address alternative for surface soil in this document. If the extent of lead concentration is delineated then the text should present remedial goals for the clean-up of surface soil. The text should present a detailed analysis of alternatives.

3. Section 2.1.2.3, Page 2-19, Paragraph 2 states that subsurface soil at Building 604 will not be considered further for the FS or remedial action. However, the text does not explain why the subsurface soil is not considered. The text should explain why the subsurface soil at Building 604 will not be considered for the remediation. This comment also applies to Building 71.

4. Section 4.0 states that alternatives have been developed to respond to the remedial need for groundwater and soil separately. In Section 2.1.1.1 the text states that surface soil will be assessed further for the FS. However, the text only developed remedial alternatives for groundwater but it does not address surface soils within this FS. The rationale for not addressing the surface soil in this FS should be given.

5. Section 4.0, Page 4-1 through 4-16 addresses development and screening of alternatives. However, in the beginning of this section without any discussion, three alternatives for groundwater are selected for evaluation. At the end of the previous section (Section 3.0) there is also no discussion on which alternatives are selected although 11 alternatives are presented in Table 3-1. Therefore, a discussion regarding the rationale for selecting these three alternatives should be presented either in Section 3 or Section 4.

## 20 SPECIFIC COMMENTS

### **1. Section 5.2.2.2, Page 5-14, Paragraph 3, Sentence 2.**

The text states that contaminants would be destroyed through intrinsic process, irreversibly reducing toxicity by either biotic or abiotic degradation. However, the word "destroy" in the statement is inappropriate. The preferred statement should be that amount of contamination and their toxicity will be reduced due to biotic or abiotic degradation. The text should be revised accordingly.