



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

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NAS PENSACOLA

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

Subj: Draft Final Remedial Investigation (RI) Report, Draft
Proposed Plan and Draft Record of Decision (ROD) for OU 12
(Site 39: Oak Grove Campground);
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) has completed its review of the Draft Final Remedial Investigation (RI) Report, the Draft Proposed Plan and the Draft Record of Decision for Operable Unit (OU) 12 (Site 39: Oak Grove Campground). Our comments are enclosed. Upon receipt of revised versions of these documents which adequately address EPA's comments, the Agency will consider these documents for approval and finalization.

Please contact me at (404) 347-3555, x6441 if you have any questions or wish to discuss these issues further.

Sincerely Yours,

Allison D. Humphris
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

Enclosure

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

TECHNICAL REVIEW AND COMMENTS
DRAFT FINAL REMEDIAL INVESTIGATION REPORT,
DRAFT PROPOSED PLAN AND DRAFT RECORD OF DECISION
SITE 39: OAK GROVE CAMPGROUND
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

DRAFT FINAL REMEDIAL INVESTIGATION REPORT:

General Comment:

The negative references to USEPA Region IV in this document are inappropriate and must be eliminated. Many standard risk assessment principles are referenced as "required" by Region IV. Please revise the text to cite the specific guidance on which the USEPA comments were based, rather than USEPA Region IV. Some specific examples follow:

Page 6, Section 10.2.1, Paragraph 4:

"No further action was recommended by USEPA for NAS Pensacola Site 39 soil, and USEPA also requested that the soil exposure pathways not be addressed in the BRA because Site 39 surface soil now consists exclusively of clean backfill material." Please delete this sentence, along with any similar statements contained in this document. Justification for elimination of this pathway should not be USEPA, but rather the absence of a complete exposure pathway.

Page 10-23, Table 10-S:

The text must be edited to reflect that soil exposure pathways are not addressed in the BRA because of the absence of a complete exposure pathway. USEPA doesn't recommend excluding post-removal soil from the BRA; USEPA recommends the use of soil from 0 to 1 foot below land surface in the evaluation of direct contact soil exposure pathways.

Page 10-38, Section 10.4.2, Paragraph 1:

The basis for including this section can be found in RAGS Section 7.7.1, which indicates that a short description of the toxic effects of each chemical carried through the assessment should be presented in the main body of the text in non-technical language. Please eliminate the reference that USEPA Region IV requires brief toxicological profiles for all COPCs. Also, the reference to USEPA Region III Risk-Based Screening Table as another main source of toxicological information should be eliminated from this section. Region IV has previously indicated that these tables should not be used as a source of toxicity information.

DRAFT PROPOSED PLAN:

1. Abstract and Executive Summary:

Please include a summary of the groundwater investigation and the risks associated with groundwater in these sections of the document.

2. Page 1, Section 1.0, paragraph 2

The text must be revised to indicate that the removal 'reduced' rather than "eliminated" risks. The baseline risk assessment shows an unacceptable hazard index (2) resulting from exposure to groundwater by a child resident.

3. Page 2, Paragraph 3:

A. The Federal Facilities Agreement was signed in October 1990.

B. The full RCRA permit (both state and EPA portions) addresses not only the treatment, storage and disposal of hazardous materials and waste, but also the investigation and remediation of any releases of hazardous waste and/or constituents from solid waste management units. As seems to be indicated in the final sentence of this paragraph, the intent of the FFA is to integrate the Navy's CERCLA response obligations and RCRA corrective action obligations, such that the activities completed under the FFA will achieve the requirements of both programs. Please revise the text as needed.

4. Pages 3 through 7, Section 3.0:

It is misleading to include only a summary of pre-removal soil analytical results under the heading "Remedial Investigation Summary". The proposed "no further action" decision for soils is based on the post-removal soil analytical results. The pre-removal soil analytical results presented here provided the justification for the July 1994 soils removal action - ~~not~~ the currently-proposed "no further action." While it may be legitimate to refer to the pre-removal data as an early portion of the RI, the full RI must include a description of current site condition (i.e. post-removal soil analytical results) in order to meet the definition of an RI. Ideally, the pre-removal site information, the removal action itself, and the post-removal site information should be presented in chronological order in a "Site Background" section.

5. Page 6:

It would be helpful to include a glossary in the Proposed Plan which defines terms such as "PRGs" and "drinking water standards", that the general public is not likely to be familiar with.

6. General Comment:

The "Summary of Site Risks" section must be preceded with a section entitled "Scope and Role of Operable Unit Response

Action", which summarizes the lead agency's rationale and strategy for remediating the site (e.g. no further action proposed for all media; final action for the site).

7. Pages 7 through 8, Section 4.0:

A. This section must be revised to include the risk values presented in the April 1995 Baseline Risk Assessment. The values presented are from the Draft Baseline Risk Assessment dated November 1994.

B. Better justification must be provided for no further action, based on the unacceptable hazard index for the future child resident. The justifications that the contaminants are "likely not site related" and that the surficial zone is not "anticipated" to be used as a potable water source are weak. It is recommended that deed restrictions be used to eliminate the potential for this pathway to become complete. Also, in accordance with 40 CFR Section 300.435(f)(4)(ii), since the remedial action selected will result in "hazardous substances, pollutants or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after initiation of the selected remedial action". The Proposed Plan must be modified to indicate this.

C. The comparisons in this section between exposure point concentrations and state and federal drinking water standards should include the value of the exposure point concentrations.

D. The first paragraph should clearly state that it addresses site risks for soils.

E. The second paragraph should clearly state which COPCs and COCs were identified for groundwater.

F. The description of ecological risk seems to contradict earlier statements regarding the current extent of soil contamination at the site. See also, the text pertaining to assessment of ecological risk in paragraph three of the Executive Summary.

8. Pages 8 through 9, Section 5:

This section should be placed earlier in the document, in the section entitled "Site Background". See comment #4 above.

RECORD OF DECISION (ROD):

1. General Comment:

All comments on the Proposed Plan which are applicable to the ROD must be addressed for the latter document as well. This includes the majority of comments provided for the Proposed Plan.

2. Page iii:

"Because this remedy will not result in hazardous substance remaining onsite above health-based levels, the five-year review will not apply to this action." This statement is in conflict with the Baseline Risk Assessment. Please revise the text, both here and throughout the document, accordingly.

3. Page 5, Section 3.01

The text should indicate that Site 39 was officially designated a "Remedial Investigation" site upon signature of the PFA in October 1990.

4. Section 7.0, Summary of Site Risks:

A. This section must include a brief summary of the information developed in the April 1995 (not the November 1994) risk assessment.

B. The information must be presented in a manner which adequately support6 the selected remedy. The primary focus should be on those exposure pathways and chemicals found to pose actual or potential threats to human health. In general, "Guidance on Preparing Superfund Decision Documents" OERR Directive 9355.3-02 (January 1992) should be followed in preparing this section including use of standard language for the text portions of the toxicity assessment summary and risk characterization summary. Specifically, this section should include appropriate discussion and summary of each of the following points:

- Chemicals of Concern: including exposure point concentrations
- Exposure Assessment: including major assumptions about exposure frequency and duration
- Toxicity Assessment: including slope factors, weight of evidence infoamation, reference doses, and sources of toxicity infannation
- Risk Characterization: including the quantified carcinogenic risks of each contaminant of concern in each relevant exposure medium for each exposure pathway, combined (summed) carcinogenic risks reflecting all contaminants of concern and pathways reasonably expected to affect a given receptor, potential for noncarcinogenic effects identified by the hazard quotient for each contaminant of concern in each

exposure medium for each *exposure* pathway, and potential for combined noncarcinogenic effects as expressed by hazard indices.

5. General Comment:

Upon completion of the public comment period, the ROD must be revised to include a section entitled "**Responsiveness Summary**".