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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-3104

N00204.AR.001668
NAS PENSACOLA
5090.3a

June 18, 1998

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: Draft Feasibility Report
operable Unit 4, Site 15
Naval Air Station Pensacola
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has completed the review of the above subject document, dated April 21, 1998. Comments are enclosed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Gena D. Townsend".

Gena D. Townsend
Senior Project Manager
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS Pensacola
Brian Caldwell, Ensaf
Allison Dennon, Ensaf, Memphis
John Mitchell, FDEP

1.0 GENERAL COMMENTS

1. Section 1.3.3, Page 1-18 through 1-24 discusses the baseline risk assessment (BRA) in the RI which was conducted in 1997. The ecological risk assessment failed to address the potential risk from pesticides at the site where there was a pesticide handling facility. The previous comments on the baseline risk assessment suggested that re-sampling and/or COPC reevaluation should be performed. The Feasibility Study should expand on the ecological risk assessment section to address the potential pesticide risk.

2. Section 2.1.2, Page 2-9, Paragraph 1 states that the arsenic concentration in subsurface soil was roughly equivalent to the USEPA SSL of 15 mg/kg and as a consequence is not considered a significant source area. However, it is misleading to make such a statement without comparing subsurface soil sample results for arsenic with FDEP CGL which is one of the chemical specific ARARs that may have a more stringent standard. The aforementioned comparison should be made and the text revised accordingly.

3. Section 2.2, Page 2-10 discusses the Remedial Action Objectives. However, the discussion is inadequate. EPA guidance suggests that the RAOs should specify the contaminants of concern, exposure route and receptors, and acceptable contaminant levels or range of levels for each exposure route, that is, a PRG. The text should be revised accordingly.

4. Section 3.0 contains the identification and screening of technologies. However, no mention is made of any community relations pursued during technology screening. EPA guidance suggests several community relations activities during the development of alternatives such as a workshop for citizens or briefings for local officials (EPA, 1988). The community relations activities for the site should be listed in the text or a reference should be made to the Community Relations Plan for the Naval Air Station, Pensacola.

5. Section 3.0 Page 3-1, Paragraph 1, Sentence 1 states that once technologies are identified, they are reviewed for effectiveness, implementability and cost. However, since this is the preliminary identification and screening of technologies, they should be screened using only implementability. The text should be revised accordingly. In addition, the screening should be revised using only implementability at this stage of the selection process.

2.0 SPECIFIC COMMENTS

Section 23.1. Page 2-14. Paragraph 2. Sentence 3.

1. The text states that Figure 1-5 shows the areas listed in Table 2-2. However, this statement is inaccurate for Figure 1-5 and does not depict soil remediation areas. A figure should be included in this section depicting soil remediation areas.

Section 4.0.

2. Section 4.0 presents the cost estimate details. **However**, the source of cost items (vendor quote, EPA data, and engineering estimate) is not given. The tables should be revised accordingly to provide this information.

Appendix A.

3. Appendix A presents a summary of ARARs for soil and groundwater. However, not all of the applicable ARARs are addressed. For example, DOT and OSHA regulations were not considered ARARs for soil, excavation and backfill. DOT regulations are applicable to transport of the soil and OSHA regulations apply to workers performing the excavation. In addition, OSHA regulations apply to workers installing an asphalt cover for the soil. Appendix A should be revised accordingly to include the aforementioned ARARs.