

N00204.AR.004465
NAS PENSACOLA
5090.3a

LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON DRAFT RECORD
OF DECISION FOR OPERABLE UNIT 15 (OU 15) NAS PENSACOLA FL
4/4/2004
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 4, 2004

4WD-FFB

William J. Hill
CodeES31
South Division
Naval Facilities Engineering Command
2155 Eagle Dr.
P.O. Box 190010
North Charleston, South Carolina, 29419-9010

Subject: Draft Record of Decision for Operable Unit 15, Site 40-Bayou Grande, NAS
Pensacola, Pensacola, Florida

Dear Mr. Hill:

EPA has reviewed the above referenced document and we offer the following comments.

GENERAL COMMENTS:

1. This document was reviewed against the Recommended Outline and Checklist for a Record of Decision found on pages 6-60 through 6-64 of the EPA Guidance document A Guide to Preparing Superfund Proposed Plans, Records of Decisions, and other Remedy Selection Documents, EPA 540-R-98-031, July 1999. The basic structure of the Record of Decision(ROD) followed the format and topics suggested by the guidance. The following specific comments address areas which need additional explanation or clarification.
2. The document should include a section which explains how the remedy satisfies the requirements of § 121 of CERCLA as well as explaining the five year remedy

review requirements. Please see page 6-64 of the above referenced guidance document to review the details of these requirements.

3. Please include a responsiveness summary in this document which will document the results of the public participation process for this ROD.
4. The performance of a human risk assessment with three samples, at first glance, appears to be insufficient. However, the integration of the human health risk assessment with the data and results of the ecological risk assessment do provide sufficient information to make proper risk management decisions about this site.

SPECIFIC COMMENTS:

1. Page 3, Section 2.0. Please include more descriptive text describing the history of this site and why it was under investigation. The Remedial Investigation report needs to be referenced here, not just oblique references to the report by way of the tables.
2. Page 74, Section 7.2.1. The text states that the recreational and subsistence fishermen exposure scenarios were evaluated for comparison purposes in the fish ingestion risk characterization. The data presented in Tables 7-17 through 7-20 are all based upon recreational fishermen. If the subsistence fisherman exposure scenario were evaluated, the data are not presented in this section. The text and tables should be amended to include the subsistence fisherman evaluation.

If you have any questions or comments, please contact me in writing or at 404.562.8544.

Sincerely,

Gregory D. Fraley

Digitally signed by Gregory D. Fraley
DN: CN = Gregory D. Fraley, C = US
Reason: I am the author of this document
Date: 2004.04.21 14:29:03 -04'00'

Gregory D. Fraley
Senior Remedial Project Manager

cc: Tracie Vaught, FDEP