



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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NAS PENSACOLA
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MAR 11 1994

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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: Preliminary Remediation Goals and Streamlined RI/FS
Approach for Chevalier Field sites;
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear *Mr.* Hill:

The Environmental Protection Agency (EPA) is in receipt of a letter dated February 21, 1994 from Brian Mulhearn of Ensafe, the Navy's contractor for the Naval Air Station (NAS) Pensacola, to Julie Keller of this Agency. The purpose of this letter was to transmit a copy of the most recent Region III Risk-Based Concentration Table. In the letter, Brian also requested further discussion between EPA and Ensafe on the use of these values.

The purpose of this letter is to provide the Navy with written clarification of EPA's position regarding use of the risk-based concentrations (RBCs) contained in the subject table. EPA encourages the project management and technical staff of all parties concerned to hold additional discussions and meetings as needed to ensure clear communication of this position and acceptable implementation of the streamlined approach which the Navy is using to expedite the RI/FS process for sites at Chevalier Field.

In general, the risk-based concentrations (RBCs) contained in the Region III RBC table are acceptable, although the RBCs derived using reference doses and carcinogenic slope factors from data bases other than KEAST and IRIS are regarded as questionable.

As stated in the cover memo to this table, these RBCs may be used as a "desk reference" but should not be used as "a substitute for EPA guidance for preparing baseline risk

assessments." Specifically, these RBCs, along with high quality site-specific analytical data, can be used to develop Preliminary Remediation Goals (PRGs) for an individual site. Such PRGs are appropriate for use in planning and streamlining site-specific analytical and sampling requirements, or for anticipating site-specific Feasibility Study and Remedial Design needs. EPA Region IV has also determined that these PRGs may be used to facilitate the planning and implementation of removal actions. However, the PRGs cannot be substituted for the Chemicals of Potential Concern for a site, or to circumvent other portions of the baseline risk assessment. A full baseline risk assessment, including a complete evaluation of all exposure pathways and chemicals of potential concern, must be completed in order to make a final determination of what remedial action is necessary for a site.

If a removal action uses RBC-based PRGs as "cut-off" levels (i.e. concentrations below which no further removal action will be performed), the chances are good that this removal action will adequately mitigate the threat presented by the subject media for the site. However, since the RBCs presented in the Region III table were developed using the ingestion pathway only (with the exception of VOCs, which also consider the inhalation pathway), and do not consider the additive effects of multiple chemicals, adequate mitigation of the threat through completion of a removal action is not certain. In order to document that the threat has been adequately addressed, the quantity and quality of the full scan confirmatory samples collected upon completion of the removal must be adequate to support a baseline risk assessment. The baseline risk assessment can then be used to determine whether additional remedial action is required.

EPA strongly recommends that construction resulting from Base Realignment and Closure (BRAC) at a site not commence until the Parties have made a final determination that all necessary Remedial Action (RA) which may be adversely impacted by such construction is completed for that site. If BRAC construction is initiated prior to this determination, the construction activities could potentially worsen contaminant conditions at the site or delay the completion of required RA activities. The risks inherent in initiating such early construction activities will be solely the responsibility of the Navy.

In short, the streamlined approach to completing the RI/FS should include the following steps:

1. Collect biased, high-quality site-specific data for purposes of setting PRGs for the site;
2. Develop the PRGs using either the methods outlined in the guidance document: Risk Assessment Guidance for Superfund: Volume I - Human Health Evaluation Manual (Part B,

Development of Risk-base6 Preliminary Remediation Goals), or the values contained in the Region III RBC table;

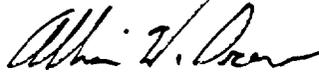
3. Use these PRGs to develop a restricted list of chemicals (including appropriate analytical and detection limits) to be used during the delineation (and/or removal) stage of the investigation;

4. Collect systematic and biased, high-quality full scan data for purposes of confirming that the goals of step 3 have been accomplished and completing the baseline risk assessment;

5. Use the data obtained in step 4 to conduct the complete baseline risk assessment for the site and determine the need for further remedial action.

Please feel free to contact me at (404) 347-3016 if you have any questions or wish to discuss these issues further.

Sincerely Yours,



Allison W. Drew
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDEP
Paul Stoddard, Ensafe/Allen & Hoshall