



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY N00204.AR.000729
 REGION IV NAS PENSACOLA
 345 COURTLAND STREET, N.E. 5090.3a
 ATLANTA, GEORGIA 30365

MEMORANDUM

DATE: JUN 09 1994

TO: NAS Pensacola Team

FROM: Allison D. Humphris, RPM *ADH 6/9/94*
 DOD Remedial Section, FFB; U.S.EPA Region IV

RE: Transmittal of **comments** on Technical Memorandum for Sites 9, 29 and 34

Attached are EPA's comments on the subject document. Please give me a call if you have any questions or want to discuss these issues further. The Navy need not revise and resubmit the Technical Memorandum, given its status as a secondary document. However, in order for EPA to consider the next primary document to be submitted for these sites for approval (i.e. the RI/BRA Report), that document must adequately address our attached comments. The Navy should also consider these comments, as appropriate, in making any decisions to conduct removal actions for these sites.

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FAX TRANSMITTAL

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TECHNICAL REVIEW AND COMMENTS
TECHNICAL MEMORANDUM: SITES 9, 29 & 34
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS:

1. Throughout this document, **Safe Drinking Water Act (SDWA) Maximum Contaminant Levels (MCLs)** should be used as the basis for comparison with groundwater data. **USEPA's Numeric Action Levels (NAL)** for contaminated Drinking Water are not appropriate **ARARs** for the groundwater at these sites and should not be used for this purpose.

2. The groundwater background sampling data is suspect due to the high (above SDWA MCL) concentrations of many Inorganic chemicals (beryllium, cadmium, chromium, lead, manganese, mercury, nickel). Unless adequate documentation supporting the representativeness of this data (e.g. collected from a contaminant-free area using adequate sampling technique) can be provided, additional samples must be collected and analyzed in order to establish NASP-specific background concentrations for groundwater. Until this issue is satisfactorily resolved, the conclusions regarding the lack of a metals problem for ground water at these sites is also suspect.

3. Since Site 10 is referenced in several places throughout the document (e.g. Figure 1, page 2), please clarify the relationship between Site 10 and Sites 9, 29 and 34 in the document text.

4. Use of the term "Contaminants of Concern" in this document is not appropriate. This term, or preferably "**Chemicals of Concern**" (COC), should be reserved for chemicals which exceed a 10^{-6} risk level or HI of 0.1 in baseline risk assessment scenarios which exceed 10^{-4} risk level or HQ of 1. Please revise the text accordingly.

5. The subsections entitled ~~Summary of Analytical Data~~ (pages 14, 25, 38) should not refer to the values presented for comparison as **ARARs**. The correct term for this set of values is **Preliminary Remediation Goals (PRGs)**. Also, the USEPA's NAL for Contaminated Drinking Water should be removed from this list and replaced with the **SDWA MCLs**.

6. All tables should be located immediately after the page which cites the table. In order to improve the readability and clarity of table contents: (i) the format for a given table should be consistent for the entire table (e.g. Table 2), and (ii) the text size will be large enough to allow distinction of text types (e.g. bold) and symbols.

7. Inorganic data must be presented in a table similar to organic data for all sites included in this report.

8. Why do Tables 2, 4, and 7 include comparisons with RBCs and CG8 but not with background?

9. All references to the "applicable RBCs" should clearly indicate which of the Region III RBCs are "applicable" (i.e., residential or industrial).

10. If ground water contamination, or the potential for soil contaminants to leach to ground water, is found to exist at these sites, site-specific soil action levels should be derived for each detected contaminant. The methodology used to derive these numbers should also be provided for review. The EPA Region III Risk-Based Concentrations may not be protective of ground water, and FDEP Cleanup Goals may be overly conservative.

11. Difficulties in attaining satisfactory quantitation limits for samples were noted in several instances. Therefore, the following confirmatory sampling/analyses will be required to support final remedial decisions for these sites:

A. The quantitation limits for volatiles for soil sample 09S0101 were elevated (1200 ug/kg). In order to support a final remedial decision for this site, soil samples should be recollected from this area and reanalyzed to confirm that volatile contamination does not exist in this area.

B. The quantitation limits for volatiles in ground water sampler 34GR01 and 34GR02 were extremely high (100 ppb), and the detection limits for semi-volatiles were elevated (40 ppb). In order to support a final remedial decision for ground water at this site, ground water from location 34GR01 and downgradient of location 34GR02 should be resampled and reanalyzed, possibly using permanent wells.

C. The quantitation limits for volatiles in the ground water sample 34GM53 were elevated (33 ppb). In order to support a final remedial decision for this site, ground water from this permanent well should be resampled and reanalyzed. It is also very possible that once confirmatory data for shallow ground water is obtained for this site, additional intermediate wells will be needed to delineate the vertical extent of groundwater contamination. Every effort should be made to anticipate and plan for this need, so that it can be completed in the upcoming field event, and prevent the need for an additional field mobilization.

D. The quantitation limits for volatiles for soil sample 34S01 were elevated (1200 ug/kg). Also, elevated levels of semi-volatiles were detected in the "09" sampling interval. In order to support a final remedial decision for this site, the additional soil samples proposed on page 40 should be analyzed not only for lead, but also for volatiles and semi-volatiles.

12. Given that elevated "J" values for pesticide were reported for the ground water sample from intermediate well GM-61, both the

intermediate well and the shallow nested well which will replace OM-96 should be resampled *for pesticides*. This information is needed to confirm the lack of a pesticide contamination problem *for* ground water and support a final remedial decision for ground water at the site.

13. In general, in instances where additional sampling is needed to delineate identified contaminants, the clearly defined objective of the upcoming round of sampling should be to **complete** adequate delineation of the subject contamination during this field event and provide final confirmation of the results (i.e. use field analytical methods and strategize/implement plans for contingency sampling as needed) (see comment 11.C. above).

14. The dieldrin concentration⁶ detected represent a legitimate contamination concern, and must be addressed through remediation where deemed appropriate based on the findings of the Baseline Risk Assessment. However, the source of the dieldrin contamination is most likely separate from the sources originally identified as Sites 9, 29 and 34. The detected concentrations are just as likely to be seen at any maintained location at NASP. In order to effectively delineate detected dieldrin contamination at the base, it may be necessary to devise a different investigative strategy. EPA recommends that inquiries be made to PWC concerning their past use of pesticides (e.g. what was used, under what guidance was it used, etc.).

SPECIFIC COMMENTS:

1. Page 4, Paragraph 21
PVC should not be steam cleaned,

2. Page 8 19-20, Table 2:
Bis(2-ethylhexyl)phthalate is included on page 8 of the Region III RBC table. Please make the appropriate corrections to Table 2.

3. Page 16, Paragraph 2:
According to Appendix B, the NAS Peneacola-specific background standard for lead is 157.60, not 78.8. Please clarify. The FSDWS for manganese is 50 ppb, not 500 ppb.

4. Page 17, Paragraph 1:
Delete the first four lines of duplicative text.

5. Page 18, Paragraph 21
Lead concentration⁶ in groundwater at this site exceeded the SDWA treatment technique action level. Lead was therefore inappropriately eliminated from consideration based on inappropriate use of the NAL value.

6. Page 23, Paragraph 2:
111 TCE is not an appropriate abbreviation. The chemical 1,1,1-

trichloroethane should be abbreviated 111 TCA and the chemical trichloroethene should be abbreviated TCE. There is no such chemical as 1,1,1-trichloroethene.

7. Page 40, Paragraph 3:

An inquiry should be made to PWC regarding the lead detected in soil samples and the semi-volatiles detected in ground water samples. If a records search indicates that these chemicals are not constituents of the believed "source" materials used by PWC at this site, it is possible that they originated from remnant fuel spills/leaks, and as such should be dealt with under FDEP's U6T program.

8. Appendix A:

Data should be presented as reported from the laboratory. It is inappropriate to present data which the laboratory has reported as 39 ug/l as 39.0000 ug/l even with the added caveat "data not shown in significant digits." Also, it appears that the data has not been transposed consistently from Appendix A to the Table 8 within the document. For instance, a comparison of Table 2 and Appendix A indicates that some values presented in Table 2 for 0960301 are from 0980301 and some are from 09S0301DL. Procedures for preparing tables from the data should be clearly stated in the document. Also, the accuracy of all tables contained in the text should be verified.

9. Appendix B:

Justification for the elimination of 01GS69 in the average concentration should be presented.