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NAS PENSACOLA
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April 5, 1995

U.S. Environmental Protection Agency
Attn: Ms. Allison Humphris
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Final Remedial Investigation Report,
Site 39, NAS Pensacola
Contract # N62467-89-D-0318/059

Dear Ms. Humphris:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit three copies of the Final Remedial Investigation Report for Site 39 at the Naval Air Station Pensacola in Pensacola, Florida.

If you should have any questions or need any additional information regarding the report, please do not hesitate to call me.

Sincerely,

EnSafe/Allen & Hoshall

Michael R Hess
for
Henry H. Beiro
Task Order Manager

Enclosure

cc: Bill Hill, SOUTHNAVFACENGCOM — 2 copies
EnSafe/Allen & Hoshall N e — 1 copy
EnSafe/Allen & Hoshall Pensacola — 1 copy
Ron Joyner, NAS Pensacola — 9 copies
John Mitchell, FDEP — 1 copy
Melisa Waters, NOAA — 1 copy
David Clowes, FDEP — 2 copies
Tom Moody, FDEP — 1 copy

TECHNICAL REVIEW AND COMMENTS USEPA
DRAFT REMEDIAL INVESTIGATION REPORT
SITE 39 (OAK GROVE CAMPGROUND)
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS:

COMMENT 1:

The primary purpose of the RI Report is to document current site conditions, since this is the information which will be used to characterize the site for purposes of developing and evaluating appropriate remedial alternatives. As such, the focus of the RI should be on presenting and describing these conditions. Historical (e.g. pre-removal) site data should be presented in the appropriate sections of the RI (e.g. site history, previous investigations, etc.) instead of comprising a major part of the RI Report "proper" (i.e. Sections 5.0 - 11.0). Ideally, all information used to support the removal action should be thoroughly documented and presented in the Removal Action Work Plan, eliminating the need to include anything more than a summary of pre-removal site conditions in the RI. However, if the time constraints associated with the removal action process preclude thorough documentation of this information in the appropriate removal documents, the RI Report may provide an acceptable alternative for documenting this information. Major revision of the entire RI Report is not necessary. However, the Baseline Risk Assessment must be revised to eliminate the pre-removal data and risk evaluations. This comment must also be taken into consideration in preparing future documents for all RI sites at NAS Pensacola, including future documents to be prepared for Site 39 (i.e. Proposed Plan and ROD).

RESPONSE:

Comment noted, the Baseline Risk Assessment for Site 39 was based on post-removal site conditions, however it will be revised to eliminate any pre-removal data and risk evaluations and the Draft Final Site 39 RI report will reflect these revisions. This comment will be considered while preparing future documents for Site 39 and other RI sites at NAS Pensacola.

COMMENT 2:

The values presented in this document as USEPA-RBC's are often incorrect. The Region III document "Selecting Exposure Routes and Contaminants of Concern by Risk-Based Screening" (March 18, 1994) should be used, and clearly referenced throughout the document. This table sets the risk level at 10^{-6} and the hazard quotient at 0.1. All soil screening should use the residential soil values included in this table.

RESPONSE:

Agreed, the Draft Final Site 39 RI report will reference the Region III document "Selecting Exposure Routes and Contaminants of Concern by Risk-Base Screening" (March 18, 1994) and any discrepancies between USEPA-RBCs referenced in the Draft Site 39 RI report and this document will be corrected.

COMMENT 3:

The document should be consistent throughout in the use of the terms "reference" or "background" concentrations (see, for e.g., Table 10-3). Please revise as needed.

RESPONSE:

Agreed, Table 10-3 and other portions of the RI report will be revised for consistency and only "reference concentrations" will be used in the Draft Final Site 39 RI report.

COMMENT 4:

The document should be consistent throughout in use of the term COC to refer to Chemicals of Concern (rather than Contaminants of Concern). *Also,* COPCs (chemicals of potential concern) is used in the text without definition. Please revise as needed.

RESPONSE:

Agreed, the document will be revised to eliminate any conflict for the acronym COC which will only be used to refer to Chemicals of Concern. A different acronym will be used if Contaminants of Concern are being referred to and Chemicals of Potential Concern (COPCs) will be defined.

COMMENT 5:

As required by the Comprehensive Sampling and Analysis Plan, all data and site maps must be submitted in electronic format.

RESPONSE:

Agreed, all data will be submitted in electronic format with the Draft Final Site 39 RI report. The photogrametric base survey map has previously been submitted, please specify which additional maps are required.

SPECIFIC COMMENTS:

COMMENT 1: Page viii:

Indicate that RAGS is Risk Assessment Guidance for Superfund: Volume 1 - Human Health Evaluation Manual (Part A).

RESPONSE:

Agreed, the acronym list of the RI report will be revised to indicate that RAGs is Risk Assessment Guidance for Superfund: Volume 1 - Human Health Evaluation Manual (Part A).

COMMENT 2: Page 2-2, Figure 2-1:

This figure shows an area labeled "backfill stockpile" but it is not explained in the text. It would help to refer to this figure in the discussion of the soil removal (e.g., Section 5.0, page 5-1).

RESPONSE:

Agreed, Section 5 will reference Figure 2-1 and the existing text already fully explains "backfii stockpile".

COMMENT 3: Pages 5-2 through 5-3, Tables 5-1 and 5-2:

A. Should the title of Table 5-1,read: "Contamination Assessment and Confirmation of Clean-up"? Please check and revise as needed.

B. It would be helpful to include the number of samples, as well as sample numbers, in these tables.

RESPONSE

A. Agreed, the heading to Table 5-1 will be revised to read "Contamination Assessment and Confiiation of Clean-up".

B. The number of each sample type will be included in these tables, however the sample numbers will not as they would clutter the table. Individual sample numbers *can* be found in the appendices.

COMMENT 4: Page 5-5, Figure 5-1:

A. Since this is the key figure illustrating the locations of all soil samples collected for Site 39, it should be revised to clearly indicate the purpose for each sample collected (e.g. screening, contamination assessment, confirmation, stratigraphic exploration, physical characterization) as discussed in the text. This may be done through the use of different symbols or by labeling each soil boring location.

B. A figure illustrating the extent (both horizontal and vertical) of the removal action conducted for soils at this site is needed. This will facilitate the reader's understanding of exactly which samples *can* be used to characterize pre-removal versus post-removal conditions at the site.

RESPONSE:

A. Figure 5-1 was included as a supplement to the written text, the uses of each sample location is described in the text as needed. At the USEPA's request each location will include a letter code for each type of sample taken from that location.

B. The pre-removal action survey only included the monitoring well locations thus these points have not changed from pre-removal to post-removal. A close approximation of a 3-D site map could be constructed to facilitate the readers understanding of the pre-removal versus post-removal site conditions, however it may be more clearly understood in a table format which lists which depth intervals have been removed. The current figures will be modified to include the estimated current thickness of backfill material at the site today.

COMMENT *5:* Page 6-4, Figure 6-2:

This figure appears to illustrate VOC concentrations in groundwater, not water level changes in shallow and intermediate wells, as indicated in the figure title. Please check and revise as needed.

RESPONSE:

Agreed.

COMMENT 6: Pages 7-1 through 7-43, Section 7:

The text and figures throughout this section should all clearly distinguish between surface and subsurface soil data.

RESPONSE:

Agreed, a common reference point should be chosen (i.e., depth to soil sample from surface as site exists today). All references to samples will the thickness of backfill material as the site exists today.

COMMENT 7: Page 7-2, Table 7-1:

The screening value for toluene should be 1,600,000 µg/kg rather than 16,000,000 µg/kg. The screening value for trichloroethene should be 47,000 µg/kg rather than 58,000 µg/kg. Please make the necessary corrections.

RESPONSE:

Agreed.

COMMENT 8: Page 7-27, Paragraph 1:

Please include the reference concentration for arsenic in this paragraph.

RESPONSE:

Agreed.

COMMENT 9: Page 7-28, Paragraph 1:

Should the reference in this paragraph be to benzo(a)pyrene rather than to pyrene? Please check and revise as needed.

RESPONSE:

No, the reference is correct as pyrene.

COMMENT 10: Page 7-29:

According to the text, three metals (sodium, calcium, and magnesium) were detected at concentrations exceeding NAS Pensacola reference concentrations in post-removal soil samples. All metals which exceeded the reference concentrations should be discussed in the text, including lead and chromium.

RESPONSE:

Disagree, only metals that exceeded PRGs or metals that had no applicable PRGs and exceeded NASP reference concentrations were mentioned in the text. Chromium did exceed the NASP reference concentration in some cases but was well below any applicable PRGs. Lead also exceeded NASP reference concentration however it was well below the screening level of 400 ppm developed by the EPA in their ***Draft Guidance on Residential Lead-Based Faint, Lead-Contaminated Dust, andhad-Contaminated Soil.*** Since this is a draft guidance document lead will be included in the text for discussion.

COMMENT 11:

A. This table would be less cumbersome if the screening values were presented on a separate table and only one column in Table 7-7 was devoted to illustrating the lowest appropriate screening value.

B. The contents of this table are somewhat confusing, since metals concentrations are listed for four shallow monitoring wells, yet only two rounds of sampling were conducted. According to the footnote, "d" indicates "the second round of sampling of monitoring wells conducted in June 1994". However, a "d" superscript/subscript is not included in the table. Please modify the table to clearly show the date of sample collection, the appropriate well ID, and identify first and second round ground water samples.

C. No inorganic data for the intermediate wells are presented in tabular form, or perhaps the well numbers are mislabeled. Tables 7-6 and 7-7 indicate that the intermediate wells were sampled during the first round and the text briefly discusses metals concentrations detected in these wells, but the concentrations are not listed. The inorganic and organic data obtained from the intermediate wells should be summarized in a table and included in the appendix.

RESPONSE:

A. Agreed, Table 7-7 had errors which made it confusing and it will be revised in the Draft Final Site 39 report. The Navy believes that presenting analytical data with all appropriate screening values is the most effective way to present the data.

B. Agreed, see response to A.

C. Agreed, Tables 7-6 and 7-7 will be revised to include data from the intermediate wells.

COMMENT 12 Page 7-41, Paragraph 6::

A. There is no USEPA-MCL for lead; 15 μg/l is the treatment technique action level (TTAL). Please revise as needed.

B. The statement in this paragraph that lead was detected at concentrations ranging from 2.5 μg/l to 5.2 μg/l is inconsistent with Table 7-7 (pages 7-35 through 7-39), which indicates that lead was detected at concentrations ranging from 16.2 μg/l to 65.2 μg/l. Please check and revise as needed.

RESPONSE:

A. Agreed.

B. Disagree, the paragraph noted is addressing the lead concentrations from the second round of groundwater sampling. The concentrations in the comment is from the first round of groundwater sampling. Because Table 7-7 has typographical errors it is confusing and it will be revised in the Final Draft Site 39 RI report. It was explained earlier in the text why the second round of sampling was considered more representative of the aquifer for metal analysis and why only this data was considered in the RI.

COMMENT 13: Pages 9-3 through 9-4, Section 9.3:

The term "receptor" is generally used in referring to human or ecological receptors. Please use a different term in referencing contaminated media or places (e.g., groundwater zone).

RESPONSE:

Agreed.

COMMENT 14: Pages 10-1 through 10-2, Section 10.1.

Please revise the list of EPA guidance documents to include all "Supplemental Region IV Risk Assessment Guidance."

RESPONSE

The list of EPA guidance documents listed on pages 10-1 through 10-2 will be revised to include all applicable "Supplemental Region IV Risk Assessment Guidance." Included in this list, as well, will be "Provisional Guidance of Quantitative Risk Assessment of PAHs" (July 1993 -- EPA/600/R-93/089) that is referred to in Comment number 22.

COMMENT 15: Page 10-6, Paragraph 4:

"Sample results from the 0- to 1-foot depth were used in this risk assessment." Please clarify how this data was used in the risk assessment. Since the excavation site was backfilled with a minimum of 1 foot of clean soil following the removal, this data will no longer meet the requirements of surface soil data.

RESPONSE:

As indicated in paragraph 4 on page 10-6, four confirmatory samples were taken from the base of the excavation at the 0 to 1 foot depth, which for the purpose of assessing potential receptor contact would be considered subsurface soil. This data was used to evaluate a potential future land use occupational receptor engaged in construction activities (i.e., excavation of subsurface soil). The only data available to assess human receptors exposed to surface soil is the composite sample results taken from the backfill material (one foot of clean soil). The revised BRA will use only the residential scenario and the backfill data.

COMMENT 16: Pages 10-10 through 10-11, Comparison of Site-Related Data to *Screening* Concentrations:

Please revise the text to clearly state that the screening values are set at hazard quotient equal to 0.1 and risk equal to 10^{-6}. *Also,* residential screening values should be used for all soils. It is inappropriate to use industrial soil values for screening purposes.

RESPONSE:

The lesser of either the USEPA or the FDEP screening value was used for NASP screening. As stated in the text of the USEPA Region III document referenced in the NASP Site 39 baseline risk assessment (BRA), the target hazard quotient of 0.1 and the risk goal of 10^{-6} were used by USEPA Region III to calculate screening concentrations for noncarcinogens and carcinogens, respectively. The text clearly references the source of the USEPA RBCs, but the text will be revised as required in Comment 15 to provide USEPA with a more detailed description of USEPA's target hazard and risk goals.

Although surface soils (0-1') are typically the only soil depth assessed as part of a BRA, the Navy assessed an alternative scenario at Site 39 — potential future workers' exposure to soil — in which workers' exposure to all soil depths was assumed because the depth and type of potential construction activities are unknown. In addition, no construction activities are known to be scheduled for Site 39 in the future. This scenario was assessed to determine what risk, if any, would be posed to construction workers during a non-typical (i.e., long-term) construction job. Residential screening values were used for all other exposure scenarios. The alternative worker scenario is clearly an industrial exposure scenario, and the corresponding industrial screening values were appropriately applied for this non-typical industrial exposure scenario, however, the revised BRA will use only the residential scenario and the backfill data.

COMMENT 17: Page 10-16, Table **10-5:**

Please include a definition for the "b" notation used in the table.

RESPONSE

For Table 10-5, page 10-16, the definition for the "b" notation used in the table is listed as 2, "the lesser of one-half the quantitation limit and the lowest reported detection was used as the default value for all non-detects." The definition for the "a" notation used in the table is listed as 1, "Number of positively detected concentrations/Total number of samples." The notes will be revised to more clearly identify what they are referring to.

COMMENT 18: Pages 10-17 through 10-18, Table 10-6:

Please remove the industrial screening values from this table and replace them with residential screening values.

RESPONSE:

Although surface soils (0-1') are typically the only soil depth assessed as part of a BRA, the Navy assessed an alternative scenario at Site 39 — potential future workers' exposure to soil — in which workers' exposure to all soil depths was assumed because the depth and type of potential construction activities are unknown. In addition, no construction activities are known to be scheduled for Site 39 in the future. This scenario was assessed to determine what risk, if any, would be posed to construction workers during a non-typical (i.e., long-term) construction job. Residential screening values were used for all other exposure scenarios. The alternative worker scenario is clearly an industrial exposure scenario, and the corresponding industrial screening values were appropriately applied for this non-typical industrial exposure scenario, however, the revised BRA will use only the residential scenario and the backfill data.

COMMENT : Page 10-20, Table 10-7.

A. The screening value for chromium should be the MCL of 0.1 mg/l.

B. TTAL should be defined as the treatment technique action level, not the treatment technology based action level.

C. The RBC notation should include the corresponding hazard quotient and risk levels.

RESPONSE:'

A. The screening value of 0.18 mg/L listed for chromium on page 10-20, Table 10-7 will be changed to 0.1 mg/L. The reference for chromium under the Source column will be changed to FPDWS/M.

B. TTAL will be defined as treatment technique action level, not treatment technology based action level.

C. As indicated in Comment 15, the corresponding hazard quotient and risk levels do not change, (i.e.; for RBCs, 0.1 for hazard quotients and 10^{-6} for cancer risks; for FSCGs, 1.0 for hazard quotients and 10^{-6} for cancer risks).

COMMENT 20: Pages 10-21 through 10-32, Section 10.3:

Since a minimum of one foot of clean fill was deposited on the site no surface soil pathways need to be evaluated in this risk assessment.

RESPONSE:

Agreed, no surface soil pathways will be evaluated.

COMMENT 21: Page 10-27, Section 10.3.2:

Please revise the text to indicate that the details regarding the rationale for exposure pathway selection/rejection *are* included in Table 10-8 rather than 10-9.

RESPONSE:

Page 10-27, Section 10.3.2, second sentence, Table 10-9 will be changed to Table 10-8.

COMMENT 22: Page 10-29, Paragraph 3:

Please correct the format error in the presentation of the UCL formula.

RESPONSE:

The format for the presentation of the UCL will be corrected.

COMMENT 23: Page 10-31, Section 10.3.4:

Please revise the text to reflect the most recent guidance on PAHs TEFs - "Provisional Guidance of Quantitative Risk Assessment of PAHs" (July 1993 - EPA/600/R-93/089).

RESPONSE:

Page 10-31, Section 10.3.4, second sentence will be changed to "As discussed in Provisional *Guidance of Quantitative Risk* Assessment *of PAHs*, the EPC associated with the family of compounds that constitutes PAHs are multiplied by a chemical-specific TEF."

COMMENT 23: Page 10-34, Figure 10-1:

A. Please present the equation of calculation of intake as one equation rather than two.

B. The units presented, mg/kg, are incorrect for the IF factor. As presented in this figure the IF factor should be in Ykg.

C. The note on the bottom of page one of Figure 10-1 is inappropriate and should be removed.

D. Please revise the figure to include a definition of CDI.

RESPONSE:

A. Separation of the two equations for calculation of intake is appropriate because groundwater intake rates are different for child and adult receptors. The equation can be combined to suit the preference of the reviewer. However, the lifetime weighted average would be more easily understood by all readers if the equations are presented as shown in the BRA in two steps. In addition, hazard quotients, hazard indices, and remedial goal options are calculated based on childhood exposure. Combined equations could distract from readers' understanding the childhood-based equations. The Navy believes that the information available is sufficient to reach a decision on Site 39.

B. The units presented on page 10-34, Figure 10-1 will changed from mg/kg to L/kg for the IF factor.

C. The note on the bottom of page one of Figure 10-1 will be removed.

D. CDI is defined as chronic daily intake within the Section of text (10.3.5 Quantification of Exposure) to which Figure 10-1 refers, however this definition will be included in the figure.

COMMENT 25: Page 10-38, Table 10-12:

A. "Other is EPA documents" is not an acceptable reference for toxicity values. Please revise to reflect the EPA document from which the information was derived.

B. Please include the definition of "A" cancer classification in the notes section of this table.

RESPONSE:

A. Note "a" on Page 10-38, Table 10-12 will be changed to "Provisional RfD provided by Mr. Kevin Koporec, USEPA Region IV Office of Health Assessment."

B. The definition of cancer classification "A" is found on page 10-33, Section 10.4.1. Section 10.4, Toxicity Assessment, references Table 10-12, however this definition will be included in the notes section of this table.

COMMENT 26: Page 10-43, Table 10-13:

A. Presentation of risk, hazard index and hazard quotient values should be as one significant figure (Table 10-13 and associated text).

B. The footnotes "0.0" and "0" on this table am inappropriate. Hazard quotient and hazard index values should be presented as one significant figure. Please revise as needed.

RESPONSE:

A. Based on previously received EPA Region N comments for NASP Operable Unit 10 and Site 13 total cancer risk and hazard index values appeared as one significant digits. Chemical specific cancer risk and hazard quotient values appeared as two significant digits. The Navy believes that the data presented is sufficient to reach a decision on Site 39.

B. The notes corresponding to "0" and "0.0" will be removed from page 10-43, Table 10-13.

COMMENT 27: Page 10-57, Section 10.9:

While the information presented in this Ecological Assessment is basically good, the assessment should follow the outline discussed previously. That is, the ecological risk assessment must include sections entitled (i) Conceptual Model (including problem formulation), (ii) Chemicals of Potential Concern, (iii) Exposure Assessment (including information obtained through a habitat and biota survey), (iv) Ecological Effects Assessment, (v) Risk Characterization, and (vi)

Uncertainties. Also, as noted previously, the risk assessment must be based solely on data or information reflecting current (i.e. post-removal) site conditions.

RESPONSE:

Agreed, the Ecological Risk Assessment must be based solely on data or information which reflects the current site conditions. As the risk assessment which was reviewed did not meet this criterion any response related to the assessment presented in Section 10 would be inappropriate. Instead the Navy will provide an ecological risk assessment which is based on post-removal concentrations in surface soils and groundwater in the draft final RI report for Site 39.

COMMENT 28: Page 10-59, Section 10.9.1:

A. Paragraph 1 states that "Soil samples were ...compared to two times the maximum reference concentration." The sentence should state that they were compared to twice the mean background concentration, as indicated in Section 7.1 (page 7-1).

B. Ground water chemical concentrations should be compared to the EPA Region IV Waste Division surface water screening values and the Florida surface water standards as a worst-case scenario of ground water contaminants discharging into a surface water body. This comparison should be shown in a table. Modifying factors such as dilution can then be mentioned.

C. Check the surface soil data used in this section and in Section 10.9.3. Only surface soil data from the backfill soils/confirmatory samples and from non-removal areas should be used in this risk assessment. (If contaminated soils were removed, they would pose no future risk to potential ecological receptors at the site.)

RESPONSE:

As mentioned in the response to Comment 26, the Ecological Risk Assessment must be based solely on data or information which reflects the current site conditions. As the risk assessment which was reviewed did not meet this criterion any response related to the assessment presented in Section 10 would be inappropriate. Instead the Navy will provide an ecological risk assessment which is based on post-removal concentrations in surface soils and groundwater in the draft final RI report for Site 39.

COMMENT 29: Page 10-62, Section 10.9.3:

A. Do not mention other CERCLA sites by name in this document, especially not as justification for comparison of surface soils to sediment screening values.

B. Comparison of surface soil chemical concentrations to sediment screening values (e.g., the NOAA Effects Range - Low and Effects Range - Median values) might be acceptable for soils located along surface water runoff pathways (i.e., soils with the potential to become sediments), but this comparison is discouraged for surface soils in general. Since the post-removal area of contaminated soils at this site is small, the ecological risk would appear to be small, based upon the limited potential for exposure. For sites with greater potential for expose, the terrestrial ecological risks should be determined differently (e.g. estimation of exposure based upon dietary intake modeling or tissue analyses, literature review on ecological effects of the contaminants, soil toxicity tests, etc.).

C. For SVOCs, ER-L and ER-M values are mentioned for PAHs in Florida sediments, yet the first paragraph in this Section mentions that the ER-L and ER-M values are based upon data from samples throughout the United States. Please explain.

RESPONSE:

As mentioned in the response to Comment 26, the Ecological Risk Assessment must be based solely on data or information which reflects the current site conditions. As the risk assessment which was reviewed did not meet this criterion any response related to the assessment presented in Section 10 would be inappropriate. Instead the Navy will provide an ecological risk assessment which is based on post-removal concentrations in surface soils and groundwater in the draft final RI report for Site 39.

COMMENT 30: Page 10-64, Paragraph 1:

The last sentence is confusing. If it compares soil concentrations to Florida water quality criteria, the comparison is not appropriate. If it compares ground water concentrations to the water quality standards, this should be stated.

RESPONSE:

As mentioned in the response to Comment 26, the Ecological Risk Assessment must be based solely on data or infomation which reflects the current site conditions. As the risk assessment which was reviewed did not meet this criterion any response related to the assessment presented in Section 10 would be inappropriate. Instead the Navy will provide an ecological risk assessment which is based on post-removal concentrations in surface soils and groundwater in the draft final RI report for Site 39.

COMMENT 31: Pages 10-64 through 10-65, Potential for Species/Community Effects:

The statement about endangered and threatened species is appropriate. However, since Section 4.4.2, page 4-7, mentions nearby populations of Godfrey's golden aster, a

state-designated imperiled plant species, add a statement about the occurrence of this species and the apparent lack of contaminant migration pathways to those areas.

RESPONSE

As mentioned in the response to Comment 26, the Ecological Risk Assessment must be based solely on data or information which reflects the current site conditions. As the risk assessment which was reviewed did not meet this criterion any response related to the assessment presented in Section 10 would be inappropriate. Instead the Navy will provide an ecological risk assessment which is based on post-removal concentrations in surface soils and groundwater in the draft final RI report for Site 39.

COMMENT 32: Page 11-4:

In order to streamline the preparation of decision documents for this site, and expedite selection of an appropriate remedial action for groundwater, EPA recommends that the RI be revised to propose limited action for all of Site 39 (i.e. soils and groundwater). This action would include no action for soils and quarterly monitoring for groundwater, with monitoring results to be evaluated at the end of one year to determine if further action for groundwater at the site is warranted.

RESPONSE:

Agreed, the RI will be revised to propose limited action for all Site 39 (i.e., soil and groundwater). This limited action is to include no action for soil, however bi-annual monitoring of the shallow aquifer is considered adequate to protect human health and the environment and also to provide a basis for a decision on any further action after the initial year. The Navy believes that doubling the cost of the monitoring is not justified or needed to make a decision on the site after a year of monitoring.

COMMENT 33: Appendix F:

A. Only the groundwater analytical results for monitoring wells 39GS01, 39GS02, 39GS03, and 39GS04 (June 1993 sampling round) are included in this appendix. Please revise to include groundwater analytical results for intermediate wells as well.

B. The groundwater resampling data near the end of the appendix lists a well ID of 39GI03. This well does not exist at the site. Could this be well 39GI06?

RESPONSE:

A. Disagree, this data is included in appendix F, however it is located on a page with QA/QC samples and is labeled on the top of the page as QA/QC Water Samples, this

label will be changed and this data will be moved with the rest of the groundwater sample data.

B. Agree, monitoring well 39GI06 had been inadvertently mislabeled 39GI03. The data label in the appendix F will be corrected.