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NAS PENSACOLA

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July 10, 1995

U.S. Environmental Protection Agency

Attn: Ms. Allison Humphris

345 Courtland Street, N.E.

Atlanta, Georgia 30365

Re: Final Preliminary Site Characterization Report

Site 5, NAS Pensacola

Contract # N62467-89-D-0318/970

Dear Ms. Humphris:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit **one** copy of **the Final** Preliminary Site Characterization Report for Site 5 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

Brian Caldwell

Task Order Manager

Enclosure

cc: Bill Hill, SOUTHNAVFACENGCOM without enclosure
EnSafe/Allen & Hoshall CTO file without enclosure
EnSafe/Allen & Hoshall file — 1 copy
EnSafe/Allen & Hoshall Pensacola — 1 copy
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Ron Joyner, NAS Pensacola — 9 copies
John Mitchell, FDEP — 1 copy
Melissa Waters, NOAA — 1 copy
Steve Cowen, BEI — 1 copy

TECHNICAL REVIEW AND COMMENTS
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV
DRAFT ' PRELIMINARY SITE CHARACTERIZATION REPORT: SITE 5
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS:

COMMENT 1:

EPA is in agreement with the Navy's conclusion that "no further action is warranted at this site based on the concentrations of detected parameters." Provided our enclosed comments are adequately addressed in the next revision of this document, EPA will consider the document, and the Navy's proposal to eliminate Site 5 from further consideration, for final approval.

RESPONSE:

Agreed.

COMMENT 2:

Throughout the document, the contaminants detected in groundwater are compared to risk based concentrations (RBCs), the reference standard, and the Florida Primary Drinking Water Standards (FPDWSs). Concentrations detected in groundwater should be compared to the Federal Maximum Contaminant Level (MCLs) and the FPDWSs, since these are the numbers that the facility must comply with for groundwater.

RESPONSE:

All references to the risk-based concentrations (RBCs) for groundwater have been deleted. Detected concentrations in groundwater will be compared to the lower of the Federal Maximum Contaminant Levels (MCLs) and the Florida Water Quality Standards (FWQSs) .

COMMENT 3:

Soil concentrations are compared to the "reference standard" and RBCs. These numbers are not appropriate for determining whether contaminant concentrations pose a potential risk via leaching to groundwater. Therefore, unless the Navy can provide alternate justification for concluding that observed contaminant levels do not present a threat to

groundwater, Soil Action Levels (SALs) must be calculated for the contaminants detected at the site in order to evaluate **this** potential.

RESPONSE:

This comment was retracted by the USEPA in the April 1995 Partnering Meeting for this site.

SPECIFIC COMMENTS :

COMMENT 1:

Pages 2-1 to 2-5, Section 2.2.2:

If the investigation of UST Site 3221NE included any metals analyses (e.g. lead) that data should be presented and discussed in **this** section.

RESPONSE:

Agreed.

COMMENT 2:

Page 2-3, Figure 2-2:

Please revise **this** figure to include the meaning of all symbols in the legend.

RESPONSE:

Agreed.

COMMENT 3:

Page 7-1, Section 7.1:

While detected concentrations in the current **soil** background samples appear low, the number of soil background samples collected is extremely limited (**18** samples from **2**

geographically proximate soil borings) and therefore may not be representative of conditions throughout the base. As discussed at the November 1994 RPM meeting, EPA recommends that the Parties work together to develop a more representative set of soil background values for NAS Pensacola.

Given the low concentrations detected in downgradient samples at Site 5, it will not be necessary to determine new reference concentrations in order to support the "No Further Action" recommendation for this site. However, suitable reference concentrations must be developed for all future sites at which detected contaminant concentrations are not low enough to clearly support a recommendation for "No Further Action". It is important that this issue be resolved in the near future, due to its potential impact on the finalization of forthcoming screening and Remedial Investigation Reports.

RESPONSE:

The Navy agrees that it is unnecessary to determine new reference concentrations to support the "No Further Action" recommendation for this site. The Navy looks forward to presenting more representative values for agency consideration in an upcoming Partnering meeting.

COMMENT 4:

Page 7-3, Table 7-1:

Please revise this table to more clearly indicate that the "mean reference concentrations" provided for antimony, mercury, and silver are theoretical values equal to one-half of the IDL, not actual detected concentrations (e.g. include the final sentence provided in this table as a footnote "c", and flag each of appropriate values in the table with a "c").

RESPONSE:

A footnote will be added to Table 7-1 outlining how the mean reference concentrations for mercury and silver were calculated. Antimony was not detected in the site samples. The appropriate reference concentrations will be flagged accordingly.

COMMENT 5:

Page 7-7, Paragraph 1:

The reference groundwater sample results must **be** provided in **this** document. Also, the most recent analytical **results** obtained for these reference wells (July-August 1994) must **be** used.

RESPONSE:

Agreed. Site 5 sample data will be compared **with** reference data obtained using the low-flow technique collected in July-August 1994. The reference concentrations are provided in Appendix H. However, due to different sample collection techniques, the **two sets** of data are not comparable. Site samples were collected **using** standard bailing equipment and procedures. However, the reference samples were collected using **a** quiescent technique, which results in less turbidity in the samples. Therefore, metals data in the site data set may falsely appear **higher** than reference due to the differing techniques.

COMMENT 6:

Pages 9-2 through 9-3, Section 9.3:

The term "receptors" is generally used in a Baseline **Risk** Assessment with respect to people, plants and animals potentially affected by site contaminants. To avoid confusion, a different term (e.g., affected media, affected areas) should **be** used to refer to media or **areas** affected by site contaminants.

RESPONSE:

Agreed. The term "**receptors**" has been replaced **with** affected media.