EnSafe / Allen
a joint venture for professional

5720 Summer Trees Dr. **Suite 8** **Memphis, TN 38134**
(901) 383-9115 **Fax (901) 383-1743**

32501.014
03.01.14.0029

N00204.AR.001043
NAS PENSACOLA
5090.3a

November 17, 1995

Mr. Jay Bassett
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Final Site 10 and 14 Preliminary Site Characterization Reports NAS Pensacola. Contract #N62467-89-D-0318/CTO-070

Dear Mr. Bassett:

Please find enclosed five copies of the Final PSC reports for Sites 10 and 14. Both Final PSC reports have been revised to address issues discussed and agreed upon during recent tier 1 team partnering meetings. Where written comments were received, responses to those comments are included as attachments to the reports. The Site 10 report includes only errata pages for revisions to the May 10, 1995 draft PSC. Please replace the corresponding Site 10 draft PSC pages with these revised pages. The Site 14 report was revised and is being submitted in its entirety as final. Appropriate copies are also being submitted to **U.S.** Navy, FDEP, NOAA, and NAS Pensacola representatives as directed.

Please contact me with any questions, or if you need additional information.

Sincerely,

EnSafe/Allen & Hoshall

for

Brian Caldwell

Brian E. Caldwell
Task Order Manager

Enclosure

cc: Bill **Hill,** SOUTHNAVFACENGCOM — **2** copies
Ron Joyner, NASP — **7** copies
John Mitchell, FDEP — **2** copies
Tom Moody, FDEP — cover letter only
John Lindsey, USDC — 1 copy
Patricia Kincaid, FDEP — 1 copy
EnSafe/Allen & Hoshall file — 1 copy
EnSafe/Allen & **Hoshall Library** — 1 copy
EnSafe/Allen & Hoshall Pensacola file — 1 copy

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV TECHNICAL REVIEW AND COMMENTS DRAFT PRELIMINARY SITE CHARACTERIZATION REPORT SCREENING SITE 14 (DREDGE SPOIL FILL) NAVAL AIR STATION (NAS) PENSACOLA, FLORIDA

COMMENT:

1. Abstract and Executive Summary:
These sections should be rewritten for clarity. In particular, each paragraph which presents and evaluates analytical results should clearly specify (i) the sample media being discussed, and (ii) the standard(s) to which the results are being compared and rationale for selection of those standard(s) Particularly if sample results for a given media are being compared with more then one set of standards).

RESPONSE:

These sections have been rewritten accordingly.

COMMENT:

2. Pages 6-1 through **6-48,** Section 6:
The data presentation is well thought out, organized and presented.. Figure quality is excellent.

RESPONSE:

The comment is appreciated,.

COMMENT:

3. **Page 6-5, Section 6.1:**
"The preliminary health risk evaluation considered the material as soil and sediment...because the basins are periodically dry and represent a potential soil pathway." For the reason stated, the results obtained for these samples should have been compared to both the Region IV sediment screening values and the Region III risk-based screening concentrations in this section.

RESPONSE:

Sediment sample data have been compared to both sediment and soil PRGs. The text and figures in Section 6.0 have been modified accordingly. Samples collected in Pensacola Bay proper were compared to SSVs only.

COMMENT:

4. Page 8-3, Current and Potential Receptors:
The term receptors should be applied only to the organisms being affected by the impacted media, not the media itself. Please revise the terminology appropriately.

RESPONSE:

The text has been changed accordingly.

COMMENT:

5. Page 9-2, Paragraph 3:
The validity of the conclusions presented in this paragraph are suspect, based on inaccuracies and inconsistencies noted in the Preliminary **Risk** Assessment (see below comments).

RESPONSE:

The conclusions presented have been modified to reflect the corrections made to the Preliminary Risk Assessment.

COMMENT:

6. Appendix D, Page **1,** Paragraph **1:**
"Site characteristics would not be expected to encourage frequent trespass or recreational use." This site could be a highly desirable attraction for a trespasser. Also, the Navy had at one time considered turning it into a recreational area. Please revise this statement, as well as the first two sentences of Paragraph 2 on page **2,** appropriately.

RESPONSE:

Appendix D was revised to state that the Tier I Partnering Team concluded Site **14** sediment will be moved to Site 6 in the future, and Site **14** sand will be used **as** construction and fill material.

COMMENT:

7. Appendix D, Page 1, Paragraph 3:
Why was the initial screening comparison against Florida CGs (included in previous drafts of this document) omitted from this revision?

RESPONSE:

As noted in Table 7, the Florida CGs were included in the comparison. The text was revised in Appendix D to more clearly state that Florida CGs were compared to RBCs, and the most conservative of the two values was used as a screening value in the Site 14 screening comparisons.

COMMENT:

8. Appendix D, Page 3:
The following statements appear to directly conflict with the results presented in Tables 7 and 8 (pages **14-15):**

> "The maximum concentrations [in sediments] of arsenic, beryllium and benzo(a)pyrene were found to exceed the occupational sediment SUSRBC."
>
> "…the lifetime-weighted average (carcinogenic) recreational **SUSRBCs** [for surface water] for.. .heptachlor epoxide were exceeded. Maximum concentrations also exceeded the hazard-based child recreational **SUSRBCs** [for surface water] for mercury and thallium."
>
> "The worker carcinogenic **SUSRBCs** [for surface water] were exceeded for.. .heptachlor epoxide, dieldrin and gamma-_____ Maximum concentrations also exceeded the hazard based site worker **SUSRBCs** for mercury and thallium."

The reviewer was also unable to reproduce the corresponding ILCRs and non-carcinogenic hazard indices presented in the text using the values contained in the

associated tables. It is therefore uncertain whether the values and results presented in the text, the tables, or both are incorrect. Consequently, the conclusions drawn from these results regarding the identification of COCs and the need for performing a full Baseline Risk Assessment must also be considered suspect.

RESPONSE:

Agreed. The text was revised to support the tables. In addition, text was added to state that the preliminary human health assessment supports the Tier I team decision to reuse dredge spoil and sand for construction and fill purposes.

COMMENT:

9. Appendix D, Page 10, Table 3:

A. Assuming an exposure frequency of "weekends" for the recreational scenario, the exposure duration should be increased from **52** to 104 days/year.

B. The exposure duration of 12 years used for the child in this table is inconsistent with the child age of "1-6" provided in Figures 1 and 2. Please clarify.

RESPONSE:

A. The FDEP trespassing exposure frequency is 80 days per year, which was reduced to **52** days per year to reflect one day per weekend per year for a restricted access area. Similar text was added as a note to Table 3.

B. For the purpose of this report, all references to child refer **to** adolescent child age, **7** to **18.** The figures have been modified to reflect the adolescent child exposure scenario, age **7** to 18 (12 years).

COMMENT:

10. Appendix D, Pages 11, 14 and 15:
Tables 4, 7 and 8 include numerous footnotes which were not utilized in these tables. Please make the appropriate changes.

RESPONSE:

Footnotes which were not applicable were deleted from Tables 4, 7, and 8.

COMMENT:

11. Appendix E, Page 9, Exposure Scenario:
Since the nearby wetlands have potentially been impacted by this site, this subsection should also include an initial evaluation of ecological risk to wetlands based on potential contaminant migration pathways (e.g. surface water runoff or groundwater discharge).

RESPONSE:

The text has been modified to discuss potential impacts to these wetlands.