



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

ATLANTA FEDERAL CENTER  
100 ALABAMA STREET, S.W.  
ATLANTA, GEORGIA 30303-3104

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NAS PENSACOLA  
5090.3a

April 3, 1997

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Commanding officer,  
Southern Division, NAVFACENGCOM  
Attn: Mr. Bill Hill (code 1851)  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

SUBJ: Response to Comments  
OU - 2, Dated 3-21-97  
Naval Air Station Pensacola  
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has completed the review of the response to comments, delivered at the March 26, meeting. There are four comments which require clarifications (see enclosure). A formalized response is not required.

If you have any questions please contact me at (404) 562-8538.

Sincerely,

Gena D. Townsend  
Senior Project Manager  
Federal Facilities Branch

cc: Ron Joyner, NAS Pensacola  
Henry Beiro/Brian Caldwell, Ensafe, Pensacola  
Allison Dennon, Ensafe, Memphis  
John Mitchell, FDEP

Note: EPA agrees with the response for the comments not listed below.

Comments - Response to EPA's comments, October 15, 1996

1. Comments listed on pages 1 and 2 of the "response to comments" are not comments for OU2. They **are** comments for site 38.
2. Page 5, **Response** to Paragraph 4: **To be** discussed on the April 8, conference call.
3. Page 12, Comment 8: The response states that the comment is not clear. There needs to be clarification in the document, **are** the contaminants listed the only ones detected above PRGs or are they the only contaminants that were detected? Technically, the nature and extent section should identify all **contaminants** that were detected and the **risk** assessment section should eliminate the contaminants that are below the PRGs. The table of contents list the "Nature and Extent" section (section 7) before the Risk Assessment (section 10). The logical progression would be to identify the contaminants (nature and extent) and then proceed to eliminate the ones that do not pose a risk (risk assessment). However, the present process has been accepted by the Agency for this document. Therefore, no action is required to address this comment. Future documents should adopt the above stated progression.
4. Page 14, Comment 13: The RBCs should be used for screening and the risk evaluations should be conducted. If the resulting calculations identify contaminants with concentrations below the MCL or the State's standards then that contaminant can be eliminated. There are a few instances where the RBCs are lower than the MCLs and those specific situations should be addressed on a site by site basis. As the comment stated, EPA MCLs are not totally risk-based values and should not be used in the risk screening process. The MCLs are used in the remedial action decision process.