

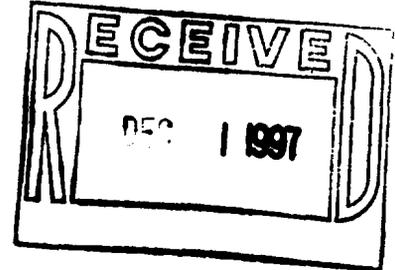


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-3104

N00204.AR.001564
NAS PENSACOLA
5090.3a

November 25, 1997



4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

commanding officer,
Southern Division, NAVFACENGC0M
Attn: Mr. Bill Hill (code 1851)
P.O. Box 190010
North Charleston, South Carolina 29419-9010

SUBJ: Draft Proposed Plan
Site 1, Operable Unit 1
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 above subject document, dated October 1997. EPA's comments are attached.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Gena D. Townsend".

Gena D. Townsend
Senior Project Manager
Federal Facilities Branch

Attachment

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

Comments

The Office of RCRA and Federal Facilities Legal Support has reviewed the draft Proposed **Plan** for Operable Unit 1 - Site 1 dated October 1997, submitted by **the U.S. Navy** for the Naval Air Station in Pensacola, Florida, and has the following comments. The comments **are based** on OSWER Directive 9355.3-02 and the National Contingency Plan, **and** the information requested is deemed necessary to provide a reasonable explanation of the proposed plan and alternative proposals considered, **as required by CERCLA § 117(a)**.

There is no discussion on the **scope** and role of OU 1 - Site 1. The "Scope and Role of Action" section must summarize the overall strategy for **remediating the entire NAS site and** describe how the action being considered in the Proposed **Plan** for OU 1 - Site 1 fits into that overall strategy. The purpose of each operable unit and their sequence should also **be described**, or at a minimum, referenced to a document in **the Administrative Record**.

The "Remedial Investigation Summary" section is insufficient. The **summary** must specifically identify **all** contaminants of concern for each media.

The summary of the Baseline Risk Assessment in the "Risk Characterization" section is insufficient. The exposure levels, associated **risks** and hazard indexes must **be described and** compared to remediation goals for carcinogens and non-carcinogens. **What are the cancer risks? What is the hazard index? The risk numbers must be presented in the Proposed Plan, accompanied by a discussion that explains what the risks mean if the site is not cleaned up. This is especially important when a "natural attenuation" alternative is proposed.**

In the "Description of Alternatives" section, include **the** estimated implementation time frames **associated** with each alternative. Describe how, and what kind of, institutional controls in Alternative 2 would be implemented. Include the lengths of time estimated to achieve degradation of contaminants for Alternatives 2.a, 2.b, and 2.c. Describe the treatment method to remove the iron from groundwater in Alternative 2.c. Because only iron will be removed, describe how the other contaminants (mainly organics which **are** above cleanup goals) will be addressed.

In the "Comparison of Alternatives" section, **under** the subsection on ARARs, state what the specific ARARs **are** for OU 1 - Site 1. For example, will Alternative 2.b require **a** dredge-and-fill permit; will Alternative 4.b require **an air permit**; will Alternatives 2, 3 and 4 require **compliance with solid and hazardous waste regulations** for **disposal** of **the excavated tar pit**, etc.?