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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

N00204.AR.001573
NAS PENSACOLA
5090.3a

December 5, 1997



4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: Draft Record of Decision
Operable Unit 17, Site 42
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 3, 1997. Comments are enclosed.

If you have any questions please contact me at (404) 5628538.

Sincerely,

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

Gena D. Townsend
Senior Project Manager
Federal Facilities Branch

Enclosure

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

Comments

The following comments and concerns are based on OSWER Directive 9355.3-02, the National Contingency Plan, and CERCLA § 117(a).

1. A major legal concern is that the proposed ROD concludes that a "No Action" scenario is protective of human health and the environment, even though the Hazard Quotients (HQs) for many constituents are above 1. There is no rationale present in the ROD that explains why the HQs that are above 1 would not pose an adverse effect on human health or the environment. Remediation goals must be protective of human health and the environment, in accordance with 40 CFR. § 300.430(e)(2)(i)(A), and shall be developed so that non-carcinogenic toxicants will not pose an adverse effect. An adverse effect is assumed to occur at a HQ which is greater than 1. See "Risk Assessment Guidance for Superfund Volume 1 - Human Health Evaluation Manual (Part B, Development of Risk Based preliminary Remediation Goals), Interim, OSWER Directive 9285.7-01B (December 1991). 40 CFR. § 300.430(e)(2)(i)(A) also allows the consideration of other factors relating to uncertainty, or other pertinent information, for developing a remediation goal, but this is not present in the ROD to justify leaving in place (through no action) constituents which pose an adverse effect. If the "No Action" scenario presents a threat to human health or the environment, then it is not acceptable as a remediation alternative.

The text should contain supporting information to justify that the site specific HQs above 1 demonstrate minimal effects to the ecological resources. This can be done by including verbiage and figures which identify the magnitude of the sampling and the actual areas where the contaminants were detected (fig. 7-7, RI, can be used as one example). Also, change the wording in the first sentence to read "An HQ of more than 1 is interpreted as a level where there is a potential for adverse ecological effects".

2. Another major concern is that the "Summary of Site Risks" section is legally insufficient. The ROD must include quantified carcinogenic risks for each contaminant of concern. The risk numbers must be presented in the ROD, accompanied by a discussion that explains what the risks mean if the site is not cleaned up.

Other deficiencies are as follows:

3. The "Site Background" section must include a history of the wastes generated and disposed of at OU 17 - Site 42.

4. There is no discussion on the scope and role of OU 17 - Site 42. This section must summarize the overall strategy for remediating the entire NAS site and describe how the action (or non-action) 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.

NOTE: Included are examples ~~from~~ a Camp Lejeune no action ROD.

5. It is not clear what is meant by ~~the~~ first sentence under "Conclusions" in Section 5.1 (page 12): "All detections were limited by nondetects in all sampling directions thus providing the ~~area~~ of extent" Because ~~this~~ document is for public review, please expand on ~~this~~ point as nontechnically as possible (Explain "nondetects." What does it mean to be "limited by nondetects?" At what point do "nondetects" occur?).
6. ~~The~~ last sentence in ~~the~~ first paragraph of Section 6.0 is misleading. ~~The~~ sentence states: "Actual ~~or~~ ~~threatened~~ releases of ~~hazardous~~ substances from ~~this~~ site, if not addressed by implementing the ~~response~~ action selected in ~~this~~ ROD, may present an imminent and substantial endangerment to public health or ~~the~~ environment." But ~~the~~ response action selected in ~~this~~ ROD is "No Action." As stated previously, if ~~the~~ response action itself ("No Action") presents an imminent and substantial endangerment to public health or the environment, then the "No Action" alternative is not acceptable.
7. There must be a section in the ROD that describes the selected remedy and how the remedy meets ~~the~~ statutory requirements of CERCLA § 121, including why the selected remedy is believed to best meet ~~the~~ evaluation criteria and why it is the ~~most~~ appropriate solution for the site. If "No Action" is the remedy, then the ROD should state that the "No Action" alternative takes into account both the current and reasonable maximum exposure scenarios, and allows for unrestricted use of, or unlimited access to, the area, or describes pre-existing institutional controls that are in place to ensure that no unacceptable exposures will occur.
8. Section 20 - General Site History; Remove ~~the~~ HRS score. Once a site is placed on the NPL ~~the~~ score has little importance.
9. ~~The~~ fourth paragraph on page 30 is misleading. If Silver was not detected at locations close to the IWTP, how can it be assumed that ~~the~~ IWTP is ~~the~~ source.