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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-3104

March 16, 1998

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

N00204.AR.001625
NAS PENSACOLA
5090.3a

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

SUBJ: Draft Record of Decision
Operable Unit 3, Site 2
Naval Air Station Pensacola
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has completed its review of the above subject document. Comments are enclosed.

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

Sincerely,

Gena D. Townsend
Senior Project Manager
Federal Facilities Branch

Enclosure

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

Comments

General

The information contained in the ROD does not appear to support the decision. The results of the ecological risk assessment demonstrate unacceptable risks to the benthic community using toxicity test information, (although aquatic toxicity tests were used to evaluate sediment contamination), and benthic community analysis. If the decision is to accept monitoring, appropriate sediment toxicity testing should be included as well as defined levels which will be acceptable or trigger a re-evaluation of other active remedial options.

Specific

1. **Pages 9 and 10, 4.0 Scope and Role of the Operable Unit; and Pages 40-41, 7.4 Alternative 4: Long-Term Sediment Monitoring (LTSM)** - The monitoring plan should include appropriate (e.g., a sediment dwelling organism such as an amphipod) toxicity testing.

2. **Page 20, 6.2 Ecological Risk Assessment** - Elevated mercury levels would require a different assessment endpoint than the benthic and nekton communities (e.g., predators).

3. **Page 22, Sediment Chemistry** - Hazard quotients (HQs) should not be summed to produce a Hazard Index (HI) unless there is a common mode of toxicity or similar target organ.

4. **Page 22, Sediment Toxicity** - Aquatic toxicity tests (mysid shrimp and sheepshead minnow) were used to evaluate sediment contamination. If these tests showed site-related toxicity than the contaminants would have to move from the sediments to an aquatic phase. How were these tests conducted? Toxicity tests using sediment dwelling organisms are preferable. It would be assumed that these tests would be more sensitive to sediment contamination.

5. **Page 41, 7.4 Alternative 4: Long-Term Sediment Monitoring (LTSM)** - Pending the results of the monitoring the implementation of alternatives 2 or 3 may be required. Trigger levels requiring re-evaluation of the remedial options should be defined. Disadvantages of this option include no reduction in risk to the ecological receptors.

6. **Page 47, Protection of the Environment** - What **is** the USEPA

reference that suggests "levels above '10 indicate a moderately high potential risk"? The last paragraph excludes statements, above the reduction of risk to ecological receptors related to exposure to site-related contaminants.