ENSAFE

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NAS PENSACOLA
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August 12,1998

U.S. Environmental Protection Agency
Attn: Ms. Gena Townsend
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

Re: Feasibility Study Report, Response to Comments
Site 15, NAS Pensacola
Contract # N62467-89-D-0318/071

Dear Ms. Townsend:

On behalf of the Navy, EnSafe Inc. is pleased to submit responses to comments for the Feasibility Study Report for Site 15 at the Naval Air Station Pensacola in Pensacola, Florida. Also enclosed are responses to FDEP's comments. If you should have any questions or need any additional information regarding the document, please do not hesitate to call me.

Sincerely,

EnSafe Inc.

Allison Harris for
Brian Caldwell
Task Order Manager

Enclosure

cc: Bill Hill, Code 1851 SOUTHNAVFACENGCOM
Ron Joyner, NAS Pensacola
Tom Dillon, N O M
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RESPONSES TO USEPA COMMENTS
SITE 15 DRAFT FS
NAS PENSACOLA

1.0 GENERAL COMMENTS

Comment 1: Section 1.3.3, Page 1-18 through 1-24 discusses the baseline risk assessment (BRA) in the RI which was conducted in 1997. The ecological risk assessment failed to address the potential risk from pesticides at the site where there was a pesticide handling facility. The previous comments on the baseline risk assessment suggested that re-sampling and/or COPC reevaluation should be performed. The Feasibility Study should expand on the ecological risk assessment section to address the potential pesticide risk.

Response: There currently are no valid data regarding pesticide toxicity in birds or mammals for soil media *against* which this site data *can* be screened. There are data appropriate for sediment and surface water, and for invertebrates. As stated in the RI, further academic and practical research needs to be conducted in this area to provide this data. Notably, remedial actions addressing the threat to human health at this *site* will in all likelihood prove sufficient to minimize residual threat to terrestrial species as well.

Comment 2: Section 2.1.2, Page 2-9, Paragraph 1 states that the arsenic concentration in subsurface soil was roughly equivalent to the USEPA SSL of 15 mg/kg and as a consequence is not considered a significant source area. However, it is misleading to make such a statement without comparing subsurface soil sample results for arsenic with FDEP CGL which is one of the chemical specific ARARs that may have a more stringent standard. The aforementioned comparison should be made and the text revised accordingly.

Response: The data were screened against the FDEP CGL.

Comment 3: Section 2.2, Page 2-10 discusses the Remedial Action Objectives. However, the discussion is inadequate. EPA guidance suggests that the RAOs should specify the contaminants of concern, exposure route and receptors, and acceptable contaminant levels or range of levels for each exposure route, that is, a PRG. The text should be revised accordingly.

Response: The requested information is included in Section 2.2.2 of the FS.

Comment 4: Section 3.0 contains the identification and screening of technologies. However, no mention is made of any community relations pursued during technology screening. EPA guidance suggests several community relations activities during the development of alternatives such as a workshop for citizens or briefings for local officials (EPA, 1988). The community relations

activities for the site should be listed in the text or a reference should be made to the Community Relations Plan for the Naval Air Station, Pensacola.

Response: The public is kept appraised of the progress of environmental work at NASP through presentations and correspondence with the RAB, which is made up of community members and representatives form the Navy and regulatory agencies. This is elaborated on in the Introduction. Additionally, all remedial alternatives and rationale for selection of the preferred alternative is presented to the public via the Proposed Plan.

Comment 5: Section 3.0, Page 3-1, Paragraph 1, Sentence 1 states that once technologies are identified, they are reviewed for effectiveness, implementability and cost. However, since this is the preliminary identification and screening of technologies, they should be screened using only implementability. The text should be revised accordingly. In addition, the screening should be revised using only implementability at this stage of the selection process.

Response: This comment is noted. However, given that this is predominantly a single-contaminant site, the approach taken was to focus the feasibility analysis for simplicity. Therefore, for identification of technologies, the FS discussed only in general terms what *can* be done at a CERCLA site for inorganics in soil and groundwater, and then proceeded immediately on to the technology screening step.

2.0 SPECIFIC COMMENTS

Section 2.3.1, Page 2-14. Paragraph 2, Sentence 3.

Comment 1: The text states that Figure 1-5 shows the areas listed in Table 2-2. However, this statement is inaccurate for Figure 1-5 and does not depict soil remediation areas. A figure should be included in this section depicting soil remediation areas.

Response: This comment is noted and the figure is added.

Section 4.0.

Comment 2: Section 4.0 presents the cost estimate details. However, the source of cost items (vendor quote, EPA data, and engineering estimate) is not given. The tables should be revised accordingly to provide this information.

Response: This comment is noted, however, some of the costing was derived from standard engineering practice. If further support for a particular cost is requested by the public, that analysis will be provided.

Appendix A

Comment 3: Appendix A presents a summary of ARARs for soil and groundwater. However, not all of the applicable ARARs are addressed. For example, DOT and OSHA regulations were not considered ARARs for soil, excavation and backfill. DOT regulations are applicable to transport of the soil and OSHA regulations apply to workers performing the excavation. In addition, OSHA regulations apply to workers installing an asphalt cover for the soil. Appendix A should be revised accordingly to include the aforementioned ARARs.

Response: This comment is noted. However, the reviewer is incorrect in that these are ARARs. ARARs are mandates under federal or state environmental or facility siting law that affect levels of contaminants or standards of control that the remedy has to attain if contaminants are left onsite, and were intended to compensate for the preemption of environmental permits under CERCLA. DOT and OSHA regulations have to be complied with as a matter of law.