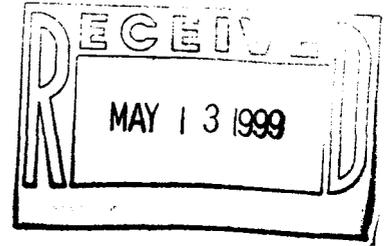




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
SAM NUNN ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, S.W.  
ATLANTA, GEORGIA 30303

May 7, 1999



4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

N00204.AR.001762  
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 4, Site 15  
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 April 2, 1999. Comments are enclosed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Gena D. Townsend".

Gena D. Townsend  
Senior Project Manager  
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS Pensacola  
**Brian** Caldwell, Ensafe  
Allison ~~Harris~~, Ensafe, Memphis  
**Joe** Fugitt, FDEP

## Comments

### Executive Summary

1. **3<sup>rd</sup> Bullet** - Remove 5 year review from this statement. It should read: “the gw monitoring program will continue until the alternative has achieved continued attainment of the performance standards and remains protective of human health and the environment.”
2. **Soils Remedy** - “LUCA” should be changed to “LUCAP”, Land Use Control Assurance Plan. (**This** comment applies to all sections where “LUCA” is used).

### Section 4

1. **Page 12, 5<sup>th</sup> bullet** - The groundwater monitoring does not have to continue until a 5-year review is performed. The monitoring program will continue until continued attainment of the performance standards, (remedial goals), are achieved and concurrence **from** EPA and the State of Florida is received to end the monitoring program.
2. **Page 13** - A section should be added to discuss that by removing the source, (soil contamination), the groundwater should return to its natural state.

### Section 5

1. **Page 19, Last paragraph** - What is the meaning behind these statements? Explain the relevancy to Arsenate.
2. **Figure 5-3** - Add groundwater flow direction to figure.

### Section 6

1. **Site Risk Summary, Page 36** - It is not clear what the Hazard Indexes and Incremental Lifetime Cancer **Risks** are. The ROD states that **6** of **53** soil sample locations, and **12** of **28** groundwater samples, had concentrations that resulted in a residential cumulative HI greater than 1, but it is not clear what **those** HIs were, or where they are located. Similarly, the ROD states that **48** of **53** soil sample locations, and all **28** groundwater samples, had reported concentrations resulting in a residential cumulative **risk** greater than **1E-6**, but it is not clear what those ILCRs were, or where they are located. Because this document is for public review, it must be stated clearly so that individuals who are not familiar with the site can understand the **basis** for taking the remedial action. [Include figures showing “residential **risk**” similar to figure 6.1]
2. **Ecological Risk Assessment, Page 45** - state whether any endangered species may be affected by the contamination.

**Section 8**

1. **Cost, Page 73** - The selected remedy **has** a longer remediation life and cost more than the other alternatives. **This** table needs to be modified or a justification needs to be added to demonstrate how the selected alternative is the best alternative.
2. **Page 79** -The Navy's selected soil remedy is Alternative 3, yet the ROD states that the State of Florida "concur[s] with the selection of Alternative 4." It appears that the State does *not* concur with the Navy's selected remedy. **This** issue must be resolved.

**Section 9**

1. **"The Selected Remedy"**- state the carcinogenic risk level to be attained and the rationale for it.
2. **Page 81, Second Bullet** - Should read "~~annual~~ review of institutional controls ....", not 5 year review.
3. **Page 81, Compliance Testing, Second Sentence** - Should read " After continued attainment of the performance standards for 2 consecutive sampling events and concurrence from EPA and the State of FL the monitoring program may be discontinued."
4. **Page 81, Compliance Testing** - Remove last sentence.

**Section 10**

1. **Section 10.2, page 84** - it seems that the references to Tables 7-2, 7-3 and 7-1 are incorrect. Should these be Tables 7-3, 7-4 and 7-5?
2. **Section 10.5, page 85** - the remedy selected for groundwater must satisfy the preference for treatment **as** a principal element, or *justify not meeting the preference*.