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ENSAFE INC.

ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

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September 9, 1999

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

NAS PENSACOLA  
5090.3a

Re: Final Record of Decision  
Operable Unit 4 (Site 15, Pesticide Rinsate Disposal Area), NAS Pensacola  
Contract # N62467-89-D-0318/083

Dear Ms. Townsend:

On behalf of the Navy, EnSafe Inc. is pleased to submit three copies of the Final Record of Decision for Operable Unit 4 (Site 15, Pesticide Rinsate Disposal Area), at the Naval Air Station Pensacola in Pensacola, Florida. Responses to USEPA and FDEP comments are also enclosed. As soon as the comment period is over, a responsiveness summary will be completed for inclusion in the ROD.

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 L. Harris  
Task Order Manager

Enclosure

cc: Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure  
Ron Joyner, NAS Pensacola - 3 copies  
Tom Dillon, NOAA - 1 copy  
EnSafe Inc. file - 1 copy  
EnSafe Inc. Knoxville - 1 copy  
EnSafe Inc. Library - 1 copy  
Administrative Record

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV  
RESPONSE TO COMMENTS  
DRAFT FINAL RECORD OF DECISION  
OPERABLE **UNIT 4** (Site **15**, Pesticide **Rinsate** Disposal **Area**)  
NAS PENSACOLA

**EXECUTIVE SUMMARY**

**Comment 1:**

**3<sup>rd</sup>** Bullet - Remove **5** year review period from this statement. It should read: "the groundwater monitoring program will continue until the alternative has achieved continued attainment of the performance standards and remains protective of human health and the environment."

**Response:**

The statement **will** be modified **as** suggested.

**Comment 2:**

Soils Remedy - "LUCA" should be changed to "LUCAP," Land Use Control Assurance Plan. (This comment applies to all sections where "LUCA" is used).

**Response:**

The change from "LUCA" to "LUCAP" **will be** made universally in the document.

**SECTION 4**

**Comment 3:**

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 the monitoring program.

**Response:**

The bullet will be revised to state:

"Groundwater monitoring **will** be performed on at least 5-year time intervals. At that time two consecutive monitoring events show continued attainment of performance standards and concurrence with USEPA and FDEP is received, the monitoring program will cease."

**Comment 4:**

Page 13 - **A** section should be added to discuss that by removing the source, (soil contamination), the groundwater should return to its natural state.

Response:

Any correlation between soil and groundwater contamination is relict. Surface soil is being remediated because of the calculated **risk** to site receptors based on existing chemical concentrations in soil, not because of threats to groundwater. Based on the fact that there is no correlation between subsurface soil and groundwater contamination, leaching of contaminants to the subsurface and groundwater from surface soils does not appear significant. Therefore, the calculated remedial volumes at the site are based on an excavation depth of **2** feet.

## SECTION 5

Comment 5:

Page 19, Last paragraph - What is the meaning behind these statements? Explain the relevancy to Arsenate.

Response:

The last paragraph on Page **19** will be removed.

Comment 6:

Figure 5-3 - Add groundwater flow direction to figure.

Response:

The groundwater flow direction will **be** added to Figure **5-3**.

## SECTION 6

Comment 7:

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 is not clear what those HI s were, or where they are located. Similarly, the ROD states that **48** of 53 soil sample locations, and a 28 groundwater samples, had reported concentrations resulting in a residential cumulative risk greater than 1E-6, but is not clear what those ILCRs were, or where they are located. Because this document is for public review, it must be clearly stated so that individuals who are not familiar with the site can understand the basis for **taking** remedial action. [Include figures showing residential risk similar to Figure 6.1]

Response:

This section will **be** clarified.

Comment 8:

Ecological Risk Assessment, Page 45 - state whether any endangered species may **be** affected by the contamination.

Response:

A statement will **be** added indicating that no endangered species will be affected by contamination.

## SECTION 8

Comment 9:

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.

Response:

The FOTW is not able to accept discharge of water from the proposed groundwater recovery system due to the elevated levels of arsenic. Therefore, groundwater Alternative 3 cannot **be** implemented and is not feasible without pretreatment of the groundwater. Groundwater recovery with pretreatment was evaluated in Alternatives 4a and **4b**. The ROD will **be** modified to reflect that Alternative 3 fails the implementability criteria.

Comment 10:

Page 79 - The Navy's selected soil remedy is Alternative 3, yet the **ROD states** that the State of Florida "concur 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.

Response:

The referenced statement includes a typographical error, the State of Florida concurs with the selection of Alternative 3.

## SECTION 9

Comment 11:

"The Selected Remedy" - state the carcinogenic risk level to **be** attained and the rationale for it.

Response:

This section will **be** modified to include the carcinogenic risk level to **be** attained and corresponding rationale.

**Comment 12:**

Page **81**, Second Bullet - Should read "annual review of institutional controls .....", not **5** year review.

Response:

This statement will **be** modified to reflect the requirements of the **LUCAP**.

**Comment 13:**

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 Florida the monitoring program may be discontinued."

Response:

The text will be modified **as** suggested.

**Comment 14:**

Page **81**, Compliance Testing - Remove last sentence.

Response:

The referenced sentence will **be** deleted.

**SECTION 10**

**Comment 15:**

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**?

Response:

The table references will **be** corrected.

**Comment 16:**

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.

Response:

In groundwater, the statutory preference for treatment is directly linked to the balancing criteria for a reduction in toxicity, mobility, and volume of contamination. Given that source control measures will or have **been** executed, a continued **decrease** of groundwater contamination is the probable result of the natural attenuation base of action. Therefore, the intent of the statutory preference for treatment **as** a principal element is satisfied.