



**UNITED STATES ENVIRONMENTAL PRO.**

REGION 4  
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ATLANTA, GEORGIA 30303

N00204.AR.001849  
NAS PENSACOLA  
5090.3a

December 2, 1999

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

SUBJ: Draft Proposed Plan  
Operable Unit 13, Sites 8 & 24  
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, Knoxville  
Allison Harris, Ensafe, Memphis  
Joe Fugitt, FDEP

## Comments

1. The Introduction section should state that the Proposed Plan fulfills the requirements of Section 117(a) of CERCLA.

2. On page 4, last paragraph of the "RI Findings - Groundwater" section, a statement is made that the "exposure pathway is not completed." On page 8, last paragraph in the "Comparison of Alternatives - Groundwater" section, it is again stated that "a risk pathway is not complete . . ." On page 9, in the "Preferred Alternatives - Groundwater" section, it is stated that "the exposure pathway is not complete." The Proposed Plan should describe how the groundwater pathway is not complete in the "RI Findings" section. [The proposed plan describes how the gw pathway is not complete, however, it does not define what is meant by complete. A statement should be added defining a complete Pathway, (i.e., contaminated media coming in contact with a receptor).]

3. In the "Description of Alternatives" section, include the estimated volumes and implementation time frames associated with removing the soils in Alternatives S-3(a) and S-3(b). For Alternative G-3, include more information on the groundwater monitoring, such as what constituents will be monitored and the remediation levels to be achieved.

4. On page 8, in the "Comparison of Alternatives" section, the Proposed Plan fails to state the implementability, and short- and long-term effectiveness of the alternatives. These are primary balancing criteria which should be considered. [Use the language in the ROD]

5. On page 8, last paragraph in the "Comparison of Alternatives - Groundwater" section, state whether the alternative will comply with the ARARs.

6. The Proposed Plan should state that the preferred alternative does not satisfy the statutory preference for treatment as a principal element, and justify why not meeting the preference is acceptable in this case. [The soil is being treated. The gw is being monitored. The pp needs to justify why monitoring the gw is acceptable. (i.e., source removal will allow the gw to return to its natural state).]