



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

SAM N U " ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

N00204.AR.001958

NAS PENSACOLA

5090.3a

October 4, 2001

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: Feasibility Study Report
Operable Unit 2
Naval Air Station Pensacola
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has completed its initial review of the above subject document. As was stated, in the meeting on August 28, 2001, these are general comments and a comprehensive review will be conducted on the next submittal. 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, Ensaf, Knoxville
Allison Harris, Ensaf, **Memphis**
Joe Fugitt, FDEP

Comments

1. There is no action required for this comment. The information that is provided in this Feasibility Study, (FS), is needed and is acceptable in this document, however, the proper place would have been in the Remedial Investigation, (RI). The contaminant comparison to the “environmental media evaluation criteria” in this document is not typically included in this phase of the process. The identification and evaluation of contaminants of concern are usually performed in the RI. The FS is designed to develop and screen remedial alternatives.

2. ARARs are defined as standards, requirements, criteria or limitations that are determined to be legally applicable or relevant and appropriate Federal and/or State requirements. The State’s “Dry Cleaning Solvent Cleanup Program” or the “Brownsfield Cleanup Criteria” are not applicable or relevant to NAS Pensacola. Therefore, the classification of groundwater as low yield/poor quality is not appropriate. The contaminants of concern need to be reevaluated using the appropriate criteria.

3. In Section 8 and throughout the document because the groundwater was evaluated using the PQG criteria, contaminants may have been eliminated. This elimination has resulted in the groundwater contamination to be discussed as single well hits and no plumes have been identified. The groundwater should be reevaluated and all detections should be identified to determine an area of concern.

Specific Comments

1. **Page 3-11.** This section addresses leaching values protective of water bodies. Naphthalene has been identified in soil and gw. The text states, because levels are low, attenuation is expected to reduce the contaminant concentration before it discharges into the yacht basin. However, naphthalene was detected in wetland 64 sediments. The text also states that naphthalene in soil will not be considered a potential threat to gw and the soil/gw areas will not be considered a potential threat to adjacent water bodies. Because naphthalene has been identified in wetland 64 it should be retained as a contaminant of concern.

2. **Page 4-6.** Cadmium was removed as a COC based on the PQG criteria. This is not appropriate. Cadmium was detected in soil, gw and wetland 64. Cadmium should be retained as a Contaminant of Concern, (*COC*).

3. **Page 4-6.** The soil alternatives appear to only address the PAHs. The identified sampling locations also contained cadmium. The alternatives should be reevaluated to include cadmium.

4. Site 12. There appears to be wide spread PCB contamination in the soils. However, the sampled soils are under asphalt. **Is** the PCB contamination older than the asphalt and is there a possibility that there may be contamination under the building?

5. Page 5-1. The text states that the chromium identified is in the trivalent state and the RSCTL assumes hexavalent state. Has this been verified and accepted by the State of Florida?

6. Page 6-1. Section **6.1.1** states that the chromium is primarily in the trivalent state. How was this determined? If the chromium is primarily trivalent, what other form is it in?

7. Page 6-9. The text states that mercury was only detected at one location and the adjacent borings did not contain Mercury above the SL-PQG, suggesting that no large mercury source exist. The text should identify if Mercury was detected in other locations surrounding the one hot boring, even if the hits are below standard. This would identify if this area contained wide spread mercury or if the detected sample is an isolated location.

8. Page 7-10. The text states that Dieldrin was detected in only one intermediate well and not in shallow wells. The text also states that the absence of Dieldrin from gw indicates that it **is** not a threat to surface water. The text should read that Dieldrin does not appear to be impacting the surface water via groundwater discharge.

9. Page 7-14. The text states that **14** out of 20 sediment samples had detections of contaminants. The text then proceeds to say that the compounds contributed to a minimal hazard and are not considered a primary source of wetland contamination. This statement should be removed. The contaminants detected in the wetland are the same contaminants that are associated with Site **30**. The impact to the wetland is not discussed in this report., therefore, the use of the term minimal hazard may be premature.

10. Page 8-1. The text states that this is not a usable drinking water aquifer, therefore sodium and the secondary standards were excluded. This is not a valid argument. The State has designated all aquifers as drinking water aquifers unless there is approval to meet other criteria. **NAS** Pensacola has not been granted that approval. Also, the secondary standards should not be excluded. The State of Florida requires that the remedial goals include the secondary contaminants.

11. Page 8-9 & 8-11. The text states that secondary metals were excluded from evaluation and the VOCs detected in wells were not detected in sediment, therefore, Site 11 is not considered a primary source of wetland contamination. Although, Site 11 may not be the only source of contamination in the wetland, it is a potential source and the designation of not being a primary source has little relevance.

12. Page 9-7. The text states that Site 25 is not adjacent to any freshwater body. It

appears that the groundwater discharge from this site is Wetland 6.

13. Page 9-19. The text states that Site 27 **is** not adjacent to a freshwater body. Groundwater flow direction from Site 27 is toward Wetlands 5b and 6. Therefore, the groundwater discharge points appear to be the wetlands.

14. Table 9-6. The text states and implies that the contamination identified in Wetlands 5A, 5B, and 6 is not from Site **30**. This is a misleading statement. The contaminants that have been identified in the wetlands are the same contaminants that have been identified at Site **30**. **Also**, the groundwater flow direction from Site **30 is** toward the wetlands. Although there are other inputs of groundwater contamination to this site and the wetlands, it **is** documented that Site **30** was a functioning part of the NADEP area and a wide range of contaminants have been detected in the soils and groundwater.