



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY**

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

April 30, 2003

4WD-FFB

Commanding Officer,
Southern Division, NAVFACENCOM
Attn: Mr. Bill Hill (ES31)
P.O. Box 190010
North Charleston, South Carolina 29419-9010

SUBJ: Final Remedial Investigation Addendum
Operable Unit 3, Site 2
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,

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

Gena D. Townsend
Senior Project Manager
Federal Facilities Branch

Enclosure

cc: Greg Campbell, NAS Pensacola
Allison Harris, Ensafe, Memphis
Tracie Vaught, FDEP

1. Comments

The conclusion section in this report states, *“the multiple lines of evidence gathered during the investigation of Site 2 concluded that the area is recovering from past Naval Base Activities”*. Although, the data may demonstrate that there is a change in site conditions, it does not necessarily support a recovering effect. The contaminants appear to have shifted over time from natural phenomena or normal dispersion; this would support a change in site conditions more so than a recovering effect. Additionally, the comparison of data from the two different sampling events can be performed on a generalized basis, it cannot be performed as an exact comparison. The last sampling event used the DQO process as a design standard which produced a more comprehensive sampling scheme than the initial sampling event. However, the data does support the present day conditions of the site and a decision can be made in the next step.

Figure 4-1, “Decision Flow for Each Decision Unit” states, if condition “1” or “6” of triad exist in top 6” of sediment, declare unacceptable condition, calculate remedial goal objectives and go to FS. The document identifies two decision units (DU) that demonstrated condition “6”, CD-23 and EF-45. Also, from NOAA’s comments, EF 23 may be an additional area of concern. The next step in this process would be to calculate a remedial goal and proceed to a FS to evaluate alternatives. Keep in mind, a physical action will not necessarily be required, however, all alternatives should be evaluated and the most appropriate alternative selected.

Observations of the effected DUs:

CD-23

- Sample conditions: silty on top, sandy underneath
- Subsurface core length: 6”–17”
- The subsurface contamination is higher than the surface.
- The contaminants include metals and PAHs
- Remedial area would include a depth 36” and approximately include 17” worth of material (due to compaction).
- DU near sea wall

EF-45

- Sample conditions: dark silty sediments
- subsurface: hard pack sands, divers could not insert cores, little or no organic deposits
- Surface contamination: PAHs
- DU appears to straddle the submerged sea wall
- DU could possibly be impacted by the normal activities from Port Ops.

EF-23

- Sample conditions: Silty sand, broken shells
- Subsurface core length: 6"- 16"
- Surface contamination: metals and PAHs, higher in surface than subsurface.
- DU near sea wall

2. Editorial Comments

1. Page 1-4, 2nd paragraph, 6th sentence – incomplete sentence
2. Page 4-19, 5th paragraph, last sentence – tables 3-10 and 3-11 should be 3-8 and 3-9.