



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 29, 2005

4WD-FFB

William J. Hill
CodeES31
South Division
Naval Facilities Engineering Command
2155 Eagle Dr.
P.O. Box 190010
North Charleston, South Carolina, 29419-9010

Subject: Draft Focused Feasibility Study Report Addendum, Site 2, NAS Pensacola, Pensacola, Florida

Dear Mr. Hill:

EPA has reviewed the above referenced document and we offer the following comments.

SPECIFIC COMMENTS:

1. Section 1.2, Page 1-4, Paragraph 3. Text states, "the sampling stations were based on the same transect system originally established for this site." It would be helpful to discuss this system. Please include how each 150 square foot sampling box in the corresponding Figure 1-3 is represented, what the numbering inside each box represents, and where the sample within the box is taken, i.e., if it was in the center or at a random location within the box. Furthermore, note where the 2000 sampling was taken with respect to the hot spots found in previous 1996 sampling, shown in the Figure 1-2.
2. Section 1.2.1, Page 1-7, Paragraph 1. Text notes the presence of contamination in only 2 of 11 DUs sampled, and references the Figure 1-3. The locations of these contaminated DUs are not shown in Figure 1-3, but are identified in Figure 1-4. Please change text to reference Figure 1-4 instead.
3. Section 1.2.1, Page 1-8, Paragraph 1. Text discusses the "weight of evidence" used to evaluate each station. As this approach seems rather vague, please discuss how this is used and define the criteria. Furthermore, the determination of the "condition (1-6)" for

each 150 square foot section is not explained clearly. Again, discuss the criteria used.

4. Section 1.3.1, Page 1-11, Paragraph 2. Text mentions Site 38. Please Identify in a figure the proximity of this site to site 2.
5. Section 3.2.1, Page 3-7, Paragraph 1. The text discusses the No Action alternative and the natural attenuation anticipated. Please note whether there is an estimated time frame for this process to occur, based on surrounding conditions.
6. Section 3.2.1, Page 3-9, Paragraph 3. Community acceptance section should be rewritten to state “The status of community acceptance for Alternative 1 will be established after the public comment period for the FFSA.”
7. Section 3.2.2, Page 3-9, Paragraph 3. Long term effectiveness of capping certainly depends on the maintenance of the capping material. Appendix B cost analysis indicates re-capping every 10 years. This should be noted in text.
8. Section 3.2.2, Page 3-11, Paragraph 4. Community acceptance section should be rewritten to state “The status of community acceptance for Alternative 2 will be established after the public comment period for the FFSA.”
9. Section 3.2.3, Page 3-13, Paragraph 1. Please add a note in the Cost subsection to address what costs may be associated with liability of disposal waste.
10. Section 3.2.3, Page 3-13, Paragraph 5. Community acceptance section should be rewritten to state “The status of community acceptance for Alternative 3 will be established after the public comment period for the FFSA.”
11. Section 3.2.4, Page 3-16, Paragraph 4. Community acceptance section should be rewritten to state “The status of community acceptance for Alternative 4 will be established after the public comment period for the FFSA.”
12. Figure 1-3, Page 1-6. Please include hot spot locations for contamination in the figure. It appears that the box edges for the DUs are at the location for 1996 sample hot spots, such that if the 2000 sample is taken from the center of the DU, the hotspot may not be repeated. Please discuss the strategy intended here in corresponding text. The figure also indicates that there is no sampling in the ship docking area. This could possibly be because the docking area is dredged regularly, but text should note that as well in the corresponding text.
13. Table 1-2, Page 1-14. The number of exceedences for each contaminant should be expressed as a fraction of samples tested for that analyte. The number of exceedences may have changed, from 1996 to 2000, but the fraction may indicate something different. Please either include a statement in the table notes for the number of samples for each concern group for each of the two years or split the number of exceedences column into two columns each expressing a fraction of the number of samples taken.

If you have any questions or comments, please contact me in writing or at 404.562.8544.

Sincerely,

Gregory D. Fraley
Senior Remedial Project Manager

cc: Tracie Vaught, FDEP