Navy Response to USEPA Comments on the Final Record of Decision OU 13 NAS Pensacola, Pensacola Florida July 17, 2006

Comments received 17 July 2006

Comment 1:

Statutory Determinations - Please include a statement that the facility has used permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. The earlier soil removal action would satisfy this criteria.

Response 1:

The text on page viii has been modified as follows:

Statutory Determinations

The selected remedy is protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost-effective. *The facility has used permanent solutions and alternative treatment technologies or resource recovery technologies including the previously completed soil removal action to the maximum extent possible.* This *final* remedy does not satisfy the statutory preference for treatment, but was selected because of the relatively low contaminant concentrations, lack of potential current and future receptors, and the long remedial time frame and high costs associated with treatment of metals at low concentrations.

Comment 2:

Section 5.3, page 16 - The areas of pesticide contamination at Sites 8 and 24 are a "release" within the meaning of CERCLA Section 101(22). According to Section 2.2, Site 8 was used as a pesticide storage and equipment rinsing area and Site 24 was used for mixing pesticides with diesel fuel prior to application. In addition, the text describing Site 24 activities include identification of a spill. The pesticide exemption under CERCLA Section 107(I) relates to cost

recovery. It does not void the requirement to remediate the release of a pesticide. Please revise the text and remedy as needed to address this comment.

Response 2:

The exemption under CERCLA Section 101(22) was not used. Instead a risk decision was made based on the CH2M Hill Inc. Technical Memorandum "Evaluation of Site Conditions Based on Results of Soil and Groundwater Sampling NAS Pensacola, Operable Unit 13, Site 24" (October 30, 2002). The document provided rational that because groundwater has not been affected in the area after more than 50 years of operation at the site and COCs in the soil are consistent with the background/anthropogenic concentrations, soil removal is not necessary and a greater impact to the environment would realized by the destruction of more than a dozen trees in the area. The risk decision was made by the NAS Pensacola Partnering Team including USEPA and FDEP representatives.

Comment 3:

Please identify current and anticipated future land uses and groundwater uses before discussing summary of site risks.

Response 3:

The text in section 5.5.6, page 27 has been modified as follows:

5.5.6 Current and Potential *Use* and Receptors

Site 8 is currently used by the NAS Pensacola PWC Maintenance/Material Department for offices and to store building materials on the paved area west of Building 3561. Miscellaneous office trailers and fenced storage, including Building 3678, are north of the building. The paved area east of the building is used for PWC storage and employee parking. The projected future site use is consistent with current use of office space and commercial storage.

Site 24 is located immediately north of Building 3561, near the northwest corner of the Barrancas National Cemetery. Nearly three quarters of the site is part of the Barrancas

National Cemetery and contains multiple gravesites. The central and northern portions of Site 24 are primarily unpaved and sparsely covered with native grasses and trees. However, the fenced storage area around Building 3678, in Site 24's southern portion, has a gravel/crushed shell land surface. An unimproved dirt road runs west to east across the site's center. The site is currently used as a buffer zone between John H. Towers Road and the Barrancas National Cemetery and for cemetery burials. The projected future site use is consistent with current use of undeveloped buffer zone and cemetery burials.

Transport of parameters detected at Sites 8 and 24 is generally downward from surface soil through subsurface soil to groundwater.

Comment 4:

Table 6-4 - Please spell out the word corresponding to the acronym "EPC."

Response 4:

The acronym has been corrected to ECPCs and is spelled out in the document text and table as *"Ecological Chemicals of Potential Concern"*

Comment 5:

Section 6.7 - Please identify the cleanup levels referenced in the first paragraph.

Response 5:

In Section 7.2 - first paragraph, the cleanup levels referenced are the Florida Residential Soil Cleanup Target Levels, coupled with the risk decision referenced above in Response to Comments No. 2.

Comment 6:

Section 6.7, second paragraph, 7th sentence - Please delete the word "significant."

Response 6:

The word "significant" has been deleted from Section 7.4, second paragraph, 7th sentence.

Comment 7:

Alternative 3 is indistinguishable from Alternative 2. Alternative 3 proposes monitoring in the heading but monitoring is not discussed in the text below. Also, Alternative 2 proposes land use controls which will restrict groundwater until cleanup levels are met but determination of this endpoint would require monitoring.

Response 7:

Reference to groundwater monitoring is included in Section 7.5 on Page 41. However the text has been amended as follows:

7.5 Alternative G3: LUCs with Monitoring

Under this alternative, no remedial actions would be taken to reduce, treat, or decrease the mobility or toxicity of onsite groundwater contamination. However, LUCs would be implemented to restrict groundwater use until cleanup levels are met, thereby precluding potential unacceptable exposures to contamination. The LUC boundary is shown in Figure 7-2. This alternative does not require any changes to existing activities, since current activities at OU 13 (including a PWC and cemetery) do not use the surficial aquifer for a potable water source. A LUC RD work plan will be prepared as the land use component of the RD. *A LUC Remedial Design (RD) work plan will be prepared as the land use component of the RD. In accordance with the Site Management Plan and the NAS Pensacola Federal Facilities Agreement, the Navy shall prepare and submit for a LUC RD that shall contain implementation and maintenance actions, including periodic inspections to EPA and FDEP for review.* In addition, this alternative will implement a monitoring program to track the groundwater plume's migration and ensure that concentrations of COCs as they leave the site are at acceptable levels. *Implementation of this alternative does not require any innovative technologies or construction activities. Many contractors are available in Florida to perform groundwater monitoring activities.*

Comment 8:

Table 7-4. Correlate ARARs to the proposed remedy to which they apply.

Response 8:

All ARARs listed in Table 7-4 correlate to Remedial Alternative G2 LUCs and Alternative G3 LUCs with Monitoring. The title of the table has been changed to:

Table 7-4, ARARs *for LUCs and LUCs with Monitoring*

Comment 9:

Comparison of Alternatives - Specify the types of land use controls proposed. In addition to the notice on the base master plan, indicate whether the facility will use signs or fencing to prohibit access. This is necessary to support the cost comparison for each remedy.

Response 9:

The text in Section 8.1, page 46, second paragraph has been modified as follows:

Alternative G2 provides for LUCs until cleanup levels are met which would prevent the use of the aquifer at OU 13 as a potable water source. *LUCs will be implemented through administrative procedures to provide protection to human health. The site area will be formally documented as non-residential use in the Base Master Plan. At any time that a property is considered for an alternative use or any intrusive activities are planned, a site approval or dig permit process is initiated. The restricted area will be delineated and the restriction will be described in the Base Master Plan. Enforcement will be achieved through the Activity's site approval and Dig Permit processes. The site use and Dig Permits must be approved by the Activity Environmental Office before any intrusive or construction activities are performed. Re-evaluation will be required for any land use changes. The Remedial Design work plan will outline implementation actions for the LUCs.*

Through administratively controlling exposure to the groundwater, potential consumption/inhalation is precluded. ...

CHECKLIST COMMENTS:

Comment 1:

Checklist Item 3 - Add Section 6.0, last sentence of paragraph, p. 29.

Response 1:

The text indicated was added.

Comment 2:

Checklist Item 4 - LUC performance objectives are described in Section 7.1, page 35, bulleted paragraph.

Response 2:

The text indicated was added.

Response 3:

Checklist Item 8 - Add Section 9.1, second paragraph, last two sentences.

Response 3:

The text indicated was added.