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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

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

March 29, 2007  
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: OU2 Proposed Plan, Pensacola Naval Air Station, Pensacola, FL

Dear Mr. Hill:

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

1. Site Background -
  - a. Indicate whether the 1988 RC RA permit been renewed or reissued by FDEP.
  - b. State whether the facility is an operating TSD or has converted to a generator since the permit was issued.
  - c. State whether this is a RCRA/CERCLA unit.
2. Scope and Role of Operable Unit - Describe how OU 2 fits into the overall remediation plan or, at least, the cleanup plan for units within the same watershed.
3. Site Characteristics
  - a. For each subunit, describe the scope and extent of contamination associated with that unit. Provide a map which distinguishes soil contamination from groundwater contamination. Please see Appendix A of the ROD guidance for an example of the amount of detail the Proposed Plan should include.
  - b. Identify constituents of concern for each unit.
  - c. Indicate whether there are any geographic or topographic features that would affect remedy selection. One of the groundwater remedies mentions a wetland but this is not discussed in the Site Characteristics section.
  - d. Indicate the groundwater classification for the groundwater underlying this site since this will impact the remedial action objectives?
4. Summary of Site Risks -

- a. Provide information contrasting concentrations found at the site against the screening levels/cleanup levels used. This can be done in a table. Indicate the land use upon which the screening numbers are based.
  - b. Include regulatory citations associated with the acceptable risk ranges mentioned in 2<sup>nd</sup> paragraph on page 5.
  - c. It is unclear whether the facility performed a risk assessment. 40 C.F.R. § 300.430(d)(4) requires that the facility conduct a site specific baseline risk assessment to characterize the threat posed by the contamination. Please revise the proposed plan to include this information. See Section 3.3.5 of the ROD guidance.
  - d. Indicate the land use upon which the COCs were determined.
  - e. Please clearly indicate the basis for taking action. See Chapter 6, footnote # 11, in the ROD guidance.
  - f. The GSI is proposed as a component of Alternative GW-3 to determine whether the groundwater is contaminating the adjacent wetlands. Why isn't this investigation being during the site evaluation?
5. Remedial Action Objectives
- a. Level I, II, and III criteria is listed in F.A.C. 62-780. Please correct reference.
  - b. Please explain why Florida GCTLs are being used as a Remedial Action Objectives instead of MCLs. Per 40 C.F.R. § 300.430(e)(2)(B), MCLs established under the Safe Drinking Water Act shall be attained by remedial actions for groundwater that are current or potential sources of drinking water.
6. Summary of Cleanup Alternatives - For each remedy described, indicate the time period required for the remedy to achieve the remedial action goals.
7. Summary of Cleanup Alternatives, Alternative 3 -
- a. Second paragraph, 4<sup>th</sup> sentence and 5<sup>th</sup> sentence. CAMUs constitute applicable or relevant and appropriate requirements with technical requirements for construction. It is unclear why consolidating contaminated soil under the proposed asphalt cap for Site 27 is appropriate and would relieve the facility of the requirement to comply with the CAMU construction standards. Please explain. Are constituent concentrations in the contaminated soil high enough to trigger LDR?
8. Summary of Cleanup Alternatives, Alternative 5, 3<sup>rd</sup> paragraph
- a. It does not appear that the subunits comprising this OU would contain listed hazardous waste since they ceased operation prior to November 1980. Please delete all of this paragraph except the first sentence.
  - b. Identify the offsite disposal location.
9. Summary of Cleanup Alternatives, Alternative GW-2 -
- a. The groundwater determination should be done prior to the Proposed Plan since the results may change the remedial action goals. Please revise the ROD as necessary to address this comment.
  - b. This remedy includes monitoring but does not include the groundwater/surface water interface investigation. Please explain why.
10. Summary of Cleanup Alternatives, Alternative GW-3, 3<sup>rd</sup> paragraph - Indicate how the NFA status is related to the Florida GCTL remediation goal.
11. Summary of Cleanup Alternatives, Alternative GW-4 - Describe the riparian corridor that would be installed for OU 2. Indicate whether this remedy would interfere with ongoing activities or require relocation of structures or utilities.
12. Summary of Cleanup Alternatives, Alternative GW-5 - Justify inclusion of this remedy as a legitimate alternative since the text states that the remedy is probably not appropriate for OU 2.

13. Summary of Cleanup Alternatives, Alternative GW-7 - Permits for onsite remedies are not required, per CERCLA Section 121(e). Explain why this remedy would require an NPDES permit.

14. Preferred Alternative - Include the statutory determinations and Five Year Review requirement. See Section 6.3.13 of the ROD guidance.

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

Sincerely,

**Gregory D.  
Fraley**

Digitally signed by Gregory D. Fraley  
DN: cn=Gregory D. Fraley, c=US,  
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Date: 2007.03.29 17:22:50 -0400

Gregory D. Fraley  
Senior Remedial Project Manager

cc: Tracie Bolanos, FDEP