N00204.AR.002282
NAS PENSACOLA
5090.3a

LETTER FROM THE U S EPA REGION IV REGARDING REVIEW OF FINAL TECHNICAL MEMORANDUM ON ECOLOGICAL ASSESSMENT METHODOLOGY FOR OPERABLE UNIT 1, 2 AND 7 NAS PENSACOLA FL
4/8/1993
U S EPA REGION IV

INFO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

rec. 4/8/93

APR 08 [redacted]

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Cliff Casey
Remedial Activities Branch (Code 11518)
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 10068
Charleston, South Carolina 29411-0068

RE: Final Technical Memorandum on Ecological Assessment Methodology, Operable Units 1, 2 and 7
Naval Air Station Cecil Field, NPL Site

Dear Mr. Casey:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Final Technical Memorandum on Ecological Assessment Methodology for Operable Units 1, 2 and 7. Our comments are enclosed. Should you have any questions or concerns regarding these comments, please contact me at (404) 347-3016.

Sincerely,

James W. Hudson, RPM
Department of Defense Remedial Section
Federal facilities Branch

Enclosure

cc: Eric Nuzie, FDER
Basit Ghori, NAS Cecil Field

Technical Review and Comments
Technical Memorandum on Ecological Assessment Methodology
for Operable Units 1, 2 and 7

The detection limits for chemical analysis of surface water and sediment samples should be sufficiently low for comparison with appropriate surface water quality standards/criteria and sediment screening values, as much as possible. (See the attachment for the sediment screening values.)

Include figures showing the site layout for Sites 4, 17, and 16, and the proposed sampling locations at these sites.

Sec. 3.1, p. 3-5. Clarify whether the additional surface water and sediment samples will be analyzed for all Target Compound List organics and Target Analyte List inorganics.

Include the sampling interval for surface soil samples (e.g., 0-6 inches bls, as shown for Site 5 in Section 3.2.3, page 3-10).

Fig. 3-2, p. 3-6. The second portion of the constituent list should be headed "Sediment", rather than "Surface Water", since the units are ug/kg.

Sec. 3-1, p. 3-7. Sediment samples should also be analyzed for grain (particle) size, at least on a qualitative basis (i.e., percent composition of the sediment particle fractions), to describe the physical nature of the sediments.

Sec. 3.2.1, p. 3-7. The surface soil sampling depth should be 0-6 inches bls, not 0-4 inches bls.

Sec. 3.2.2, p. 3-9. This section refers to Figure 3-4 for Site 4, but Figure 3-4 shows only Site 5. A figure should be added for Site 4.

Figs 4-1 through 4-3, pp. 4-3 through 4-5. Where appropriate, include aquatic plants in these contaminant pathway models.

Sec. 5.0, p. 5-1. Analytical results should also be summarized for ground water at the appropriate sites, depending on whether contaminants in the ground water can migrate and subsequently discharge to nearby surface water bodies (as indicated in Section 6.2.2, page 6-4).

Fig. 6-1, p. 6-2. Correct the typographical errors in this figure.

Sec. 6.2.2, p. 6-3. Chemical concentrations in sediments should be compared with the USEPA Region IV Waste Management Division's sediment screening values, which are based upon the levels of sediment contaminants causing adverse biological effects, as compiled by the National Oceanic and Atmospheric Administration

(attached).

Sec. 6.3.3, p. 6-7. Field measurements of water quality parameters should also include temperature.

Sec. 7.2.1, p. 7-1. Since the wood stork, an endangered species, is a known forager in Lake Fretwell (Table 2-1, page 2-11), it is recommended that the wood stork be used as representative species for the terrestrial evaluation.

Sec. 7.2.2, p. 7-2. Subsurface soil contaminants should also be considered for any sites containing potential gopher tortoise habitat, since the gopher tortoise is a federally-designated threatened species that has been found at NAS Cecil Field (Table 2-1, page 2-10).