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NAS PENSACOLA
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LETTER FROM U S EPA REGION IV REGARDING REVIEW OF RISK REVIEW COMMENTS
ON ECOLOGICAL ASPECTS SITE 38 NAS PENSACOLA FL
10/15/1996
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

MEMORANDUM

DATE: October 15, 1996

SUBJECT: Risk Review Comments on Ecological Aspects
NAS Pensacola
Site 38
Pensacola, Florida

FROM: Joan J. Dupont, Environmental Biologist
Geographic Planning and Technical Support Branch, TSS/WMD

TO: Gena D. Townsend, Remedial Project Manager
Federal Facilities Branch, DOD/WD

Per your request, I have reviewed the **Final Remedial Investigation Report** for NAS Pensacola, Site 38. My comments provided below are divided into two sections, i.e., (1) comments specifically to you the RPM and (2) comments that, if you concur, can be conveyed verbatim to the party responsible for preparation of the document. To facilitate the verbatim conveyance, I am providing a copy of my comments in this memorandum via cc: mail.

General Comments to the RPM

It is the policy of the EPA Region 4 Office of Technical Services (OTS)/Waste Division to require written responses to review comments provided by OTS and the Geographic Planning and Technical Support Branch, Technical Support Section (TSS)/Water Management Division. If a meeting with the Federal Facility is to be held to discuss these comments, we request that written responses be provided prior to such a meeting. We also request that any risk assessment comments received from the State or any other source be provided to the reviewer for the Office of Technical Services' site file. If risk comments from sources other than OTS or TSS are forwarded to the Federal Facility's contractor, the source should be clearly identified unless concurrence of OTS or TSS is sought. In this case, we should formally review these comments and provide you with our response before they

are forwarded.

Comments to be Conveyed to the Federal Facility

Sec. 7.0, pp. 7-1 and 7-5: Clarify that the Preliminary Remediation Goals (PRGs) used in this evaluation are based upon the protection of human health and do not address the protection of ecological receptors.

Secs. 9.1 and 9.1.1, p. 9-1: Again, clarify that the PRGs are based upon the protection of human health.

Sec. 11.0, p. 11-1:

1) In paragraph 1, add a statement indicating whether or not the existing surface soil contaminants could potentially migrate into Pensacola Bay via surface water runoff .

2) In the last line of paragraph 2, explain "RC."

3) The screening of ground water analytical data is inadequate. The screening focused on data from only three wells; no basis was given for the selection of the three wells. The location of monitoring well GS32 is shown in ground water figures in Section 7, but wells GWT3 and GWT18 are shown only in Figure 5-6. The ground water figures in Section 7 show high concentrations of several contaminants, more that just those presented in Table 11-1, page 11-2. Also, those figures show only the contaminants exceeding the human health PRGs. No tables are given summarizing all detected ground water contaminant concentrations. To evaluate potential ecological risks based upon possible future migration of ground water contaminant plumes, include a table comparing the maximum ground water contaminant concentrations to the surface water screening values. This should be done primarily for the shallow ground water zone but also for any zone with a potential to discharge into the bay.

If there are any questions regarding this document, please feel free to contact me at vmx29228.