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NAS PENSACOLA  
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U S NAVY RESPONSES TO U S EPA REGION IV COMMENTS ON THE DRAFT FINAL  
PROPOSED PLAN FOR SITE 43 NAS PENSACOLA FL  
6/3/2009  
NAVFAC SOUTHERN

**Response to USEPA Comments on the Draft Final Proposed Plan  
For Site 43, NAS Pensacola, Pensacola, Florida  
June 3, 2009**

EPA has reviewed the above referenced document. We offer the following comment.

**SPECIFIC COMMENT:**

We would like to see an explanation of how you expect the G-1 alternative –also known as the preferred alternative- to eventually meet the cleanup goal. And if the cleanup mechanism is natural attenuation, please refer to my e-mail concerning natural attenuation for some guidance.

**Response to Comment:**

**The preferred Groundwater Alternative is G-1: Land Use Controls (groundwater use restrictions) and Monitoring**

This alternative would meet the minimum RAO requirements by monitoring groundwater concentrations for any attenuation and potential migration of the plume until site conditions become suitable for an exit strategy to be implemented. Administrative controls would be used to prohibit groundwater use.

In onsite groundwater the only Contaminant of Concern exceeding USEPA MCLs at Site 43 is lead. At a single location, monitoring well PEN-43-13S, lead was reported to exceed the USEPA MCL and Florida GCTL of 15 micrograms per liter (ug/L). The detected concentration in the groundwater sample from PEN-43-13S was 29.9 ug/L, which is slightly less than 2 times the MCL. Only one round of groundwater sampling has been completed.

The monitoring well with the reported exceedance (PEN-43-13S) is located at the center of Anomaly Area 11 (Figure 4-5 of the Feasibility Study, attached), where surface and subsurface soil samples were reported to contain lead concentrations exceeding Florida residential and industrial SCTLs. This area surrounding the monitoring well is proposed for removal based on the preferred alternative **Alternative S-3: Limited Excavation and Off-site Disposal, and Maintenance of Pavement to meet Florida Industrial/commercial SCTLs; and LUCs**. It is expected that this excavation would remove the soils acting as a source to the lead contamination in groundwater and the groundwater lead concentrations would decrease below regulatory standards.

Naturally occurring processes such as sorption into the soil matrix, dispersion, and dilution would reduce concentrations of lead to acceptable levels over time. The combination of Alternative G-1 with the removal of high concentrations of lead in the soil via the implementation of an active soil remediation alternative would further ensure the attainment of groundwater cleanup goals because of mass reduction in the source.

The groundwater monitoring program would not be initiated until after the soil excavation has been completed and it is anticipated that groundwater concentrations would quickly decrease so that the required two rounds of sampling results with lead below regulatory standards (MCLs and GCTLs) could be met and No Further Action criteria could be documented.