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NAS PENSACOLA
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U S NAVY RESPONSE TO COMMENTS ON TECHNICAL MEMORANDUM FOR REVISED
FEASIBILITY STUDY OPERABLE UNIT 10 (OU 10) NAS PENSACOLA FL
9/14/1995
NAVFAC SOUTHERN

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Technical Memorandum
Revised FS Memoranda Format: OU 10 FS Options
NAS Pensacola

Comment 1: The Florida FDEP Soil Cleanup Goals for Military sites should be considered ARARs and not TBCs. These values should be the RAOs for soil, unless site specific values are determined using the formula accepted by the Department.

Response 1: As per discussions with the Tier I Partnering Team, the FDEP's *Soil Cleanup Goals for Military Sites* are considered TBCs that will be considered relevant and appropriate to the site unless site-specific cleanup goals are available.

Comment 2: The Preliminary Remediation Goals (PRG) in soil for Benzo(a)pyrene and Dibenz(a,h)anthracene in Table 1 should meet the FDEP Soil Cleanup Goals for Military Sites of 140 $\mu\text{g}/\text{kg}$ (residential) or 500 $\mu\text{g}/\text{kg}$ (industrial).

Response 2: As per discussions with the Tier I Partnering Team, site-specific PRGs for protection of human health and the environment were developed in the BRA performed during the RI. For more information, please refer to the *Final Remedial Investigation Report, Naval Air Station Pensacola, Operable Unit 10 and Site 13* (EnSafe/Allen & Hoshall, September 1995).

Comment 3: In Table 4, I have no problem with Capping as a technology or alternative, but I do have concerns of using asphalt as the cap. An asphalt cap would increase the likelihood of the site being accessed by vehicles and heavy equipment. This usage would create the likelihood of cap failure. Also, the use of this area will likely change due to the closure of the IWTP.

Response 3: OU 10 will remain a domestic wastewater treatment plant; given the presence of several ordnance bunkers and the treatment facility on Magazine Point, it is unlikely land use will change with the closure of the IWTP. Currently, Site 32 (the ISDBs) has an asphalt cap approved as per FDER Closure Permit Number HF17-134657. These caps, like all asphalt pavement, are designed to bear loads; loads are supported by the base and subbase design. Due to the mechanics of asphalt pavement, vehicular loadings are necessary to maintain the strength and integrity of the cap. Although vehicle access may be restricted, light-duty traffic and use as temporary staging areas will likely not increase the chances of cap failure. An O&M plan, similar to the ones implemented for the RCRA-closed units, will be implemented to inspect and maintain the cap.

Comment 4: Under the Section Assembly of Alternatives, Alternative III should be titled Offsite Landfilling rather than Excavation. Excavation is a technology incorporated in an alternative such as offsite landfilling or offsite incineration.

Also, I do not believe offsite incineration of soil should be excluded as an alternative. This alternative is currently being proposed for the NADEP realignment area for treatment of contaminated soils.

Response 4: As defined in USEPA feasibility study guidance documents, excavation is a technology process option which can be combined with other treatment or disposal activities. This alternative is titled Excavation with Offsite Disposal for purposes of clarity.

Data do not suggest that offsite incineration is necessary for OU 10 soil. Constituent concentrations are relatively low, and there is no technical reason or regulatory requirement for incineration before disposal. In addition, incineration is a prohibitively expensive treatment option. For these reasons, this technology was screened out using techniques presented in the NCP and USEPA guidance documents.

More detail regarding the technology screening process will be included in the FFS.

Comment 5: ARARs are legal threshold requirements that generally take precedence over guidance or site-specific risk-based cleanup goals. If ARAR attainment is not desirable or feasible, waivers are required as described in Section 121(d) (4) of CERCLA.

Response 5: As per the NCP, site-specific risk-based cleanup concentrations are ARARs for CERCLA actions (FR 300.430[d][4] and FR 300.430[e][2][i][A]). Other ARARs may be used to develop PRGs (e.g., MCLs, as per FR 300.430[e][2][i][B]). If the attainment of ARARs are not desirable or feasible, the Navy will apply for a waiver as per CERCLA requirements.

Comment 6: Comparison of site concentrations with ambient background concentrations for arsenic in soil and sediments should be presented in the RI and BRA to support screening it out as a COC.

Response 6: Comparison of site concentrations with ambient background concentrations was performed during the RI and BRA. For more information, please refer to the *Final Remedial Investigation Report, Naval Air Station Pensacola, Operable Unit 10 and Site 13* (EnSafe/Allen & Hoshall, September 1995).

Comment 7: Mr. David Clowes, P. G., communicated the regulatory status of the State of Florida's Ground Water Guidance Concentrations in his memorandum dated October 5, 1994, "Rules 17-550 and Florida Ground Water Guidance Concentrations, Naval Air Station Pensacola". Based on Mr. Clowes' accurate explication, Florida Ground Water Guidance Concentrations should be considered ARARs and not TBCs as presented in the memorandum.

Response 7: The Navy has noted the comment.

Comment 8: The proposal for addressing groundwater contamination at Site 13 by transferring it into the on-going RCRA compliance action may have desirable features from immediate cost and institutional perspectives. The Navy, EPA, and Department, however, should review the details of the FFA, compliance order, and other applicable regulatory agreements to assure that no unintended and undesirable consequences are possible in such a transfer.

Response 8: The Navy has noted the comment.