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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

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NAS PENSACOLA
5090.3a

Mr. D. R. Spell
Head, Environmental Branch
Southern Division, NFEC
Post Office Box 10068
Charleston, South Carolina 29411

Dear Mr. spell:

On January 29, 1982, Mr. Glenn C. Bradley of your staff forwarded the first quarterly analysis report for the Hazardous Waste surface Impoundment Groundwater Monitoring Program, Naval Air Station, Pensacola, Florida, for our review as required by Section 265.94(a) of RCRA regulations.

Our review identified several concerns, some of which must be addressed if the program is to yield useful information. A copy of our review is enclosed for your use. Your response as soon as possible is warranted.

For the purpose of discussion, Mr. Don Hunter (404/881-3433) was the reviewer of this report and should be contacted if you feel it is necessary to do so.

If we can be of any assistance, please let us know.

Sincerely yours,

Arthur G. Linton, P.E.
Federal Activities Coordinator
Environmental Assessment Branch

Enclosure

cc:
Mr. Don Hunter
NAS, Pensacola - Public Works Officer

DATE

SUBJECT HWSI Ground water Monitoring Program
Naval Air Station, Pensacola, Florida

FROM Environmental Scientist
Hazardous Waste Section

TO Arthur G. Linton
Federal Facilities Coordinator

Thru: John Herrmann, Chief, Technical Support Unit *Bowfor*
James H. Scarbrough, Chief, Residuals Management Branch *JHS*

The Ground water Sampling and Analysis Plan submitted to our section has been reviewed, with the assistance of the Ground water Section. We have several concerns, some of which should be addressed if the program is to yield useful information. These concerns are as follows:

- 1) Why did they disinfect the wells with chlorine? These are not drinking water wells. The introduction of chlorine into the wells, with no absolute guarantee of complete purging afterwards will a) mitigate meaningful colliforin analyses required by RCRA and b) most likely elevate chlorine, also a RCRA parameter. In short, the addition of chlorine is a **bad** practice.
- 2) If they are using stainless steel casing, why the precaution of using PVC bailers for metal samples as opposed to the stainless bailers used for organics?
- 3) We understand their reason for locating the upgradient well as they did, but don't agree with their logic. The purpose of the upgradient well is to determine the quality of ground water that is moving onto and under a particular site, regardless of whether it is contaminated or not. This background quality is then compared to the downgradient during the second year to determine the possible effects that the site has had on the ground water. Knowing that the ground water is already contaminated is not a reason to avoid sampling for the purpose of RCRA. In order to meet the requirements of RCRA, the facility must install a legitimate upgradient well as soon as possible and begin sampling at that location.
- 4) We are in strong disagreement with the configuration of the downgradient wells. The plan has all three wells in a straight line downgradient from the midpoint of the impoundment. As far as detection goes, this arrangement serves as a single well. A proper system would have the three wells along the downgradient side of the impoundment, serving to monitor at three points equidistant from the impoundment. We strongly recommend the installation of the additional wells per this description.

CONCLUSIONS AND RECOMMENDATIONS :

Considerable attention should be given to the wells regarding removal of chlorine. If there *is* any indication of residual chlorine from the disinfectant process, a rigorous pumping program should be undertaken to assure removal.

We feel that comments number 3 and 4 must be addressed to have a system which complies with the requirements of RCRA.

Don Hunter