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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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NAS PENSACOLA  
5090.3a

AUG 28 1989

Ref: 4WD-SISB

Mr. David Criswell  
Southern Division  
NAFAC-ENGCOM  
2155 Eagle Drive  
P.O. Box 10068  
Charleston, S.C. 29411-0068

Dear Mr. Criswell:

EPA's Superfund Federal Facilities Unit (FFU) has reviewed the Work Plans submitted for a Remedial Investigation/Feasibility Study at Pensacola Naval Air Station. Three plans were not received by FFU. These are plans for site groups H, I and L. In addition, we are not providing **comments** on the Group O Work Plan which is to be submitted to the FFU at a later date. Currently, we are sending a set of initial comments on Work Plans A - G, J, K, M and N.

In addition, the Work Plans will be reviewed by a panel of ecologists from EPA and other Federal Agencies for their adequacy in addressing an Ecologic Assessment. EPA's RCRA Branch will be transmitting comments on the General FSAP. These comments apply for Superfund as well. NAS Pensacola's Work Plans are currently still under internal review, and we anticipate forwarding further comments to you by September 30, 1989. The individual site QAPPs and HSPs which the FFU only recently received are still under review.

Enclosed are our current comments on the Work Plans. These comments are arranged in the following order: 1) general comments on the overall approach to investigation, 2) comments on the Site Management Plan and the Project Management Plan, 3) general comments applying to all Work Plans, and 4) comments on specific Work Plans.

As you can see from the attachment, there are a number of significant comments. EPA is available to meet and discuss these comments. If you would like to arrange such a meeting or if you have questions regarding any of the comments, please contact Nancy Dean at (404) 347-5059.

Sincerely yours,

H. Kirk Lucius, Chief  
Site Investigation and Support Branch  
Waste Management Division

Enclosure

cc: Eric Nuzie, FDER

### GENERAL COMMENTS

1. NAS Pensacola has separated the RI/FS Work Plans into groups of sources (RCRA SWMUs). The Navy intends to do individual RIs and RODs for each source. This means that the Navy plans to have 37 operable units at Pensacola. EPA suggests that RIs and RODs only be done for sites that have contamination. Other solid waste sites should be investigated in a preliminary manner, such as the Phase I investigations in the Work Plans, and eliminated with EPA's concurrence from further study. If such an investigation has already been done, the Navy may propose to eliminate a waste site from consideration now. Instead of just concentrating on sources, EPA strongly urges the Navy to separate out certain contaminated media and investigate them as separate operable units. The proposed operable units are surface water bodies containing contaminated sediments from the receipt of hazardous substances over an extended period of time and which individually may provide exposure pathways that pose risks to human health and the environment. We suggest the three following operable units: 1) contamination from Naval Operations in Pensacola Bay, 2) contamination from Naval Operations in Bayou Grande, and 3) contamination from Naval operations in freshwater wetlands at NAS Pensacola. EPA recommends breaking these 3 operable units out as separate investigations due to: 1) the complex risk assessments that are needed, 2) the fact that many sources including nonpoint sources and even base contaminated groundwater contribute to these three operable units, 3) the need to make a decision on what if any actions need to be taken in order to prevent risk from the contamination to public health and the environment and, 4) if these investigations are combined with an individual source, it may delay a decision on that source.

2) Associated with the above comment is the need to perform an Ecologic Assessment as part of a Risk Assessment for these three surface water bodies. Some of your Work Plans suggest limited sediment sampling in these areas, however, a more detailed assessment will be required. Enclosed is a copy of the Guidance Documents - Risk Assessment Guidance for Superfund - Environ va 1 3  
Manual (Attachment 1) and Review of Ecological R SSI 1 1  
Methods (Attachment 2). Also enclosed is a copy of a recent Ecologic Assessment Work Plan (Attachment 3) for a small wetlands area in Brandon, Florida as an example of what Region IV considers necessary for such an Assessment.

## SITE MANAGEMENT PLAN COMMENTS

1. Table 4-1 shows the prioritization of individual sites for investigation and the schedule by which the various Site Group Work Plans (containing 1 or more individual sites) will be implemented. There appears to be a problem in this area of scheduling. For example, a low priority C site in Work Plan E is scheduled for an early start, whereas a high priority A site in Work Plan N is scheduled for a late start. EPA urges the Navy to start all priority A sites early. This may mean either breaking out priority A sites **from** Group Work Plans and doing an individual Work Plan for that site or alternatively reordering start dates for the Work Plan Groups.
2. Administrative Record requirements are being sent to all Federal facilities in Region IV.
3. Low priority sites should be investigated last. EPA recommends that priority sites be the first **RODs** completed. EPA considers this important for two reasons: 1) it will concentrate resources on problems and not nonproblems; 2) it will give the community the assurance that remediation is under way at the Base, so that when the Navy holds a NFA public meeting, it will have been preceded by public meetings where actual cleanup decisions were discussed.

## PROJECT MANAGEMENT PLAN

1. Once a schedule is approved as part of a Work Plan, it will be incorporated into the Interagency Agreements (IAG) and be subject to conditions of the IAG. Therefore, schedules cannot be easily changed or revised. Extensions must be requested and will only be approved for good cause.
2. EPA cannot commit to a review time outside of the Interagency Agreement.
3. EPA reports should go to the attention of **Mr.** Patrick M. Tobin, Waste Management Division. The FFU will require five bound copies and one unbound copy of documents submitted for EPA review.
4. If the Navy plans to change operable units at a later date, then the Project Management Plan must be revised. EPA suggests the Navy make these decisions as much as possible now. **This** will give the Navy more control over the projects as they proceed through the Superfund process.

## WORK PLANS GENERAL COMMENTS

The comments below apply to most or all of the Work Plans submitted, as many of the same techniques, methods and procedures were common to all of the Work Plans.

1. EPA recommends that the Navy limit the number of phases in its investigation. Most RIs utilize a two phase approach, but **justification** of four phases as you have suggested should be provided. If a four-phase approach is used, EPA will require an amended or revised Work Plan for each phase. These amendments are necessary since not all data requirements are specified in the initial Work Plan. EPA will have to review and comment on each amendment. This should be included in your schedule.

2. Many of your sites already have confirmed contamination. Why are you not proceeding to characterize and delineate per phases II and III in the Work Plan instead of starting with phase I? The sites include Group A, Site 1; Group B, site 11; Group D, site 15; Group G, site 27; and Group J, site 3.

3. A better schedule is needed in each Work Plan (see attached Attachment 4 as an example). Each RI/FS must be conducted in a reasonable length of time. Guidance references 18 to 24 months. Please submit in each Work Plan a definite timetable with an exact schedule and no dashes leading off into the distant future. This schedule will become part of the IAG once the Work Plan is approved.

4. The Risk Assessment Sections were somewhat limited. The Agency for Toxic Substances and Disease Registry has requested that since there was no explanation of the methods or assumptions for which the potential impact of the sites on public health will be evaluated that the following data for each site be obtained during the investigation.

- \* Distance to the closest residence (on or off base)
- \* Type of barrier, if any, to prevent access.
- \* Approximate population within one-fourth mile of the site (including the base).
- \* Sensitive land uses in the vicinity of the site (schools, hospitals, retirement homes, etc.).
- \* Activities (recreational or occupational) which take place near the sites and the estimated number of people involved.
- \* Records of any environmental and/or health complaints by persons regarding the sites.
- \* Log of actions taken by health unit regarding health issues, complaints and concerns.

5. The **Risk** Assessment Sections should reference that the following **EPA** guidance will be used in preparing the Risk Assessment: Superfund Public Health Evaluation Manual and Risk Assessment Guidance for Superfund - Environmental Evaluation Manual. Both a public health assessment and an environmental (ecologic) assessment must be done.

6. Risk Assessments should use IRIS for determining acceptable levels of risk if contaminants are included in the data base.

7. All samples to characterize contamination should be sampled for the **TCL**, except for those wells specified by RCRA, which will be analyzed for Appendix IX.

8. Region IV protocol is not to install PVC wells at sites where there are solvents in the groundwater. This protocol is part of the Standard Operating Procedures that will be a requirement of the IAG.

If this presents a significant problem, please contact us for further discussion.

9. **Are** supply wells (including back-ups) at NAS Pensacola sampled and analyzed on a regular basis? If so, what are they analyzed for?

10. Your Work Plans provide a thorough and extensive sampling plan of the sources and for shallow groundwater. However, the Work Plans indicate that all shallow wells are to be installed at the water table and that installation of deeper wells is dependent on finding contamination in the shallow wells. **Due** to the fact that "sinkers" such as TCE may not be found in your shallow wells, the Navy should install cluster wells at different depths rather than shallow wells only.

#### SITE SPECIFIC COMMENTS

##### Group A

14.3.5 Please note that already existing deep and shallow wells show a difference in types of contaminants. This is site specific evidence that deeper well definition of contamination should not be based on shallower well contamination.

16. The aquifer on-site has been preliminarily classified as Class I, ecologically vital water, using Guidelines for Ground-water Classification under the EPA Groundwater Protection Strategy. This classification is based on 1) the surface water discharging into Bayou Grande and Pensacola Bay which are likely to contain threatened or endangered species, and 2) the high vulnerability of the surficial aquifer to contamination due to its hydrogeological characteristics. Class I aquifers are subject to the most stringent cleanup standards which would include MCLs, MCLGs or health-based criteria.

**Group B**

Table 3-1 Many of the compounds on this table have Drinking Water Standards <10 ppb. Using trace as <10 ppb disguises contamination. Make sure that all further data is reported appropriately. Minimum Detection **Limits (MDLs)** and/or Minimum Quantification Limits (MQLs) should be indicated for each set of analyses.

## Group C

14.2.1 A determination will need to be made on whether the **FDER** methods for metals in marine sediments is in accordance with **EPA** guidelines.

*How* was the sampling depth for sediment samples in Pensacola Bay determined?

**Group D**

3.1 E-P toxicity tests are only used to determine if a waste is a **RCRA** regulated characteristic hazardous waste. It is not an indication of risk, and Superfund does not use these numbers as a cutoff on whether an investigation or cleanup should be done. Superfund uses **Risk** Assessment to make these determinations.

14.1.3 *How* does your current soil sampling fit in with past sampling? **EPA** suggests not starting over again but building on what you already know as appropriate.

## Group E

14.1.3.1 *How* was the sampling depth for sediment samples in Bayou Grande determined?

**Group G**

14.1.3.1 **The** Navy needs to define the extent of contamination from the sewer. The sampling plan appears inadequate. For example, why is only **one** sediment sample being taken from **the** sewer? Where is the outfall for the sewer? Will **the** sewage plant be looked at in conjunction with this assessment? Will the outfall be looked at in conjunction with this assessment?

## Group J

6.2 Is the marshy area near this site classified as a wetland?

## Group K

14.1.1.1 The delay in investigation of site 20 is not shown on the overall Management Plan. The schedule indicates investigation for *Group* K will start with groups J and M. Please revise the Site Management Plan as appropriate.

Group N

**7.2** Please note that clay has limited to no attenuation or confining properties for certain solvents: eg. TCE.

**14.1.2.1** How deep is the sewer line buried and will soil samples reach below that depth? Also, did the Radium shop sewer connect with this sewer?

