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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SEP 01 1989

4WD-RCRA

Mr. David Criswell
Southern Division
NAFAC-ENGCOM
2155 Eagle Drive
Post Office Box 10068
Charleston, South Carolina 29411-0068

RE: RCRA Facility Investigation Workplan
Naval Air Station Pensacola, Florida

Dear Mr. Criswell:

The Resource Conservation and Recovery Act (RCRA) Waste Engineering Section has completed its review of the plans for Contamination Assessments and Remedial Activities at Naval Air Station Pensacola, which were submitted to meet the RCRA Facility Investigation Work Plan requirements outlined in the Hazardous and Solid Waste Amendments Permit. Comments on the plans are enclosed.

Our Environmental Services Division (ESD) has provided us with partial comments on the Generic Quality Assurance Project Plan (GQAPP), and those were provided to you at the July 25, 1989, Technical Review Committee meeting. We are expecting additional comments from ESD within the next two weeks or so, and at that time will transmit a complete set of formal comments on the GQAPP to you. These comments may also include review of the Site-Specific Quality Assurance Project Plans.

If you have questions regarding these comments, or need any additional information, please contact Drew Puffer of my staff at (404) 347-3433.

Sincerely yours,

James H. Scarbrough, P.E.
Chief, RCRA Branch
Waste Management Division

Enclosure

cc: Eric Nuzie, FDER

I General RFI Comments

1. Although Superfund and RCRA are separate programs, Region IV will coordinate activities between the two programs so that duplication of effort is kept to a minimum for the tasks required. Consequently, several requirements of the Superfund Program will be incorporated, to the extent possible, into the RCRA process:

   a. The Record of Decision (ROD) will be used as a base document for any HSWA permit modification(s) dealing with Solid Waste Management Unit (SWMU) determinations. Consequently, if a number of RODs are scheduled for completion and public notice at one specific time, it will streamline our process as well by clustering a number of SWMU determinations together for one public notice and HSWA permit modification event. It is our intention to use the same public notice period to address both the Superfund and RCRA requirements for a given cluster of units, which will further streamline the process.

   b. The RCRA program does not yet have a great deal of guidance that would be helpful in identifying Potential Receptors as specified in the RFI Workplan Outline. The outline is included as Appendix C of the HSWA Permit. We believe that the Navy can use the Superfund Risk Assessment process, the RFI Workplan Outline, and the attached section from the RCRA Facility Investigation Guidance as aids in satisfying the RCRA requirements for identifying potential receptors.

2. Appendix IX sampling for all potentially affected media will be required for many of these SWMUs. More limited sampling can be allowed only where the Navy can clearly demonstrate that the compounds/wastes associated with the activities taking place at a particular unit would be identified by a more restricted scope of sampling. The best sampling approach for most sites will be to first do an initial analytical screening like that outlined in the Phase I Sampling and Analytical Requirements of the work plans. The specific location where contamination is highest for each media will be the location from which the Appendix IX sample should be taken. In most cases only one sample per media per

site will be required. Units such as the Sanitary Landfill or Industrial Waste Sewer Line should require more Appendix IX samples due to their size and the wide variety of contaminants that may be found within them.

11. Project Management Plan

1. Section 5.3.4; For the RCRA program, recommended analytical methods are provided in EPA Document SW-846 "Test Methods For Evaluating Solid Waste".

2. Section 3; The Organizational Structure needs to better indicate which people in the structure are Contractor personnel and which are Navy personnel. In addition, it appears that only one person within the structural chart is from the Navy, and there clearly are more Naval personnel than that involved in the overall processes. The Structure needs to better define the Navy's role in the development and execution of the RFI.

3. We concur with the comments provided to you by Superfund regarding Interagency Agreements and changes in operable units. The latter, changing the groupings of SWMUs addressed by each of the Work Plans, threatens to introduce additional elements of complexity into a process that is already fairly complex.

III. Site Management Plan

Sites that are ranked as high priority for investigation in Tables 2-1 and 4-1 are not always accordingly scheduled for earlier startup of activities than are lower priority sites. While it may be reasonable to assume that sites ranked as high priority pose more of a threat to human health and the environment, the RFI Workplan should go ahead and outline the criteria used to prioritize these sites. If site priorities are based on real or potential threat to human health and the environment, then high priority sites should be the first investigated and remediated, thereby minimizing the possibility of environmental damage from these sites. This approach ensures that lower priority sites won't use up resources that should be used for units that most need them.

IV. Work Plan Comments

A. General

1. There appears to be an error in the climatology section of all work plans concerning minimum monthly rainfall averages. The lowest monthly average given is 10

inches, which seems to be rather high.

2. Section 7; All shallow wells in the surficial zone of the Sand and Gravel Aquifer are designed to sample only the water close to the water table interface, thereby leaving the rest of the 40 to 70 foot thickness of this zone unmonitored. Given the variable densities and solubilities of some of the contaminants of concern, such as chlorinated solvents, it is essential to consider monitoring the entire aquifer zone for contamination at each site.

3. The RPI should better resolve whether or not the Low Permeability zone truly is a continuous semi-confining or confining unit. To accomplish this, the workplans need to include the task of gathering available information on the Low Permeability Zone and fill in any data gaps that exist through additional borings, monitor wells, pump tests, etc.

4. In a number of the work plans reference is made to contamination found at specific soil boring locations during previous investigations. It would be helpful to include a diagram to show the locations of these soil borings in their respective work plans.

5. We strongly agree with Superfund that four phases for investigation is too many, and believe that an RFI with two properly designed phases should be sufficient. For this facility, this should be more easily accomplished than would otherwise be the case, since there have been previous investigations at many of these sites. This data can be incorporated into the RFI process to reduce the amount of additional data needed to evaluate these sites. Given the number of sites to be investigated, and the fact that there will be draft reports and revised reports, management and review of up to four phases of investigatory work for such a large number of sites will be very unwieldy and time-consuming.

6. The Region IV Standard Operating Procedures and Quality Assurance Manual recommends that stainless steel materials be used for monitoring well construction where organic contaminants are of concern.

V. Comments on Specific Workplans

1. Group A, Section 14.1.13; Are the storm sewer outfalls above or below the bay water level? The surface emissions survey would be effective only if the outfalls are above the water line.

2. Group C, page 3-2; In the second full paragraph, sediments are characterized as "fine grained" or "sandy". This description is very sketchy: are these clays, silts, sands or what?

3. Group E, Figure 14-1; There needs to be at least one monitoring well to the north of the two buildings comprising this site. At present, it is not appropriate to assume that migration of contaminants to north of these two buildings is not poss'ible as groundwater flow direction has not been clearly established in this area. The recommended well will help establish flow direction, and if it is upgradient of the site will be useful in establishing background groundwater contaminant levels for the site.

4. Group F, Section 14.1.1.2; It is not clear why sites 9, 10 and 23 were chosen for the radiation survey while the other sites were not. An explanation would be helpful.

5. Group G, Section 14.1.2; The workplan should explain why a geophysical survey is not recommended for site number 27.

6. Group G, Table 14-1; Acids and caustics were used at these sites, but are not among the compounds to be sampled for. This deficiency needs to be corrected.

7. Group K, Section 7.2.3; The reference in sentence number two is to site 20. Shouldn't the reference be to site 21?

8. Group M, Figure 14-2; The monitor wells appear to be clustered into the center of site 31, which does not seem logical, since groundwater contamination has been documented (by well GM-1) to be outside of this area. The wells should be more widely spaced to get a better characterization of both the contaminant plume location and the hydrogeology. Similarly, soil borings may not encompass a large enough portion of the site; it is unclear if this is so as there are no indications as to how large an area within the site was used for waste materials disposal.

9. Group N, Section 14; Given the nature of some of the contaminants, and the sandy nature of the soils, soil gas sampling might be a good methodology for assessing contamination along the sewer line.