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UNITED STATES ENVIRONMENTAL PROTECTIC

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

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NAS PENSACOLA
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Mr. David Criswell
NAVFAC-ENGCOM
Southern Division
2155 Eagle Drive
P. O. Box 10068
Code 11526
Charleston, South Carolina 29411-0068

Re: Documentation of Decisions made at the March 20, 1990
Project Managers Meeting at NAS Pensacola

Dear Mr. Criswell:

EPA is documenting by this letter agreements reached during the above referenced meeting at NAS Pensacola.

Comments that were inadequately addressed must be responded to by the Navy prior to formal approval of the RI Work Plan under the terms of the FFA. In addition, RCRA permit requirements have not been fully addressed due to the inadequacy of the responses and continued noncompliance could result in a formal RCRA enforcement action.

1. The Navy will, per EPA's recommendation, make Bayou Grande, Pensacola Bay and freshwater wetlands affected by past base operations separate "Operable Units" to be addressed as part of the NPL site under the terms of the Federal Facility Agreement. A sediment and biological monitoring plan will be submitted to EPA prior to Phase II for review and approval and inclusion in the Phase II field activities. The bio-monitoring plan will be based on the recommended EPA methods (Triad approach) and the plan will be developed in the close cooperation of the Fish and Wildlife Service and the National Oceanographic and Atmospheric Administration. Data collected from the bio-monitoring can subsequently be used in Risk Assessments for the individual sources located on these water bodies.
2. The Navy and EPA agreed that sampling dredged areas would not provide useable data.
3. The Navy agreed to provide more detailed schedules of field activities and reporting for individual Work Plans.
4. The need for review of amended Work Plans for subsequent Phases and length of the review time will be decided among the project managers after the completion of the previous phase.
5. Specific location of deeper monitoring wells to be installed during Phase I will be added to the Work Plan. Deeper

monitoring wells for latter phases will be added during amendment of the Work Plan. Specifics on the characterization of the low permeability zone will be in the Phase II Amendment to the Work Plan.

6. The Navy will provide a Navy Organizational Chart for the Project Management Plan.
7. The Navy will sample sediments at storm sewer outfalls that are below the bay water level.
8. A justification for use of monitoring well casing material other than stainless steel will be provided by the Navy.

Many comments provided by the EPA Environmental Services Division were not responded to or the responses from the Navy were not considered adequate. Below is a listing of these comments:

9. Specify how source areas for particulates will be determined.
10. Include in the plan the distance from the meteorological station to the site. Will the data be relevant to conditions at the site? Specify "other equivalent monitoring equipment." Note in the QAPP that the maximum potential for buildup occurs between 2200 and 0400 hours when temperatures exceed 80 degrees. EPA requires data to be generated from soil and waste samples for a specific location. The plan must include a method for determining airborne volatile and/or particulate contaminants.
11. The EPA criteria for meteorological stations must be met.
12. Describe methods of calibration in a stepwise and detailed procedure. Describe the precautions that will be taken to avoid cartridge contamination. Describe the desorption techniques, equipment and analytical procedures. List the absorbents that will be used in this study. EPA recommends the use of TO-14 as an absorbent. Describe how breakthrough will be determined and what flow rates and volumes will be used to minimize breakthrough.
13. Do not include glass syringes and tedlar bags in the plan except for use for grab samples due to the losses, degradation and artifact formation the methods produce. Provide in the plan the specific methods for the Method TO-14.
14. Describe in the plan specific methods and calibrations.

15. Describe in the plan the preliminary screening to be done with a particulate monitor.
16. Describe in the plan the height at which the hi-vol inlet should be placed. EPA requires its height to be at least two meters above the ground. Describe in the plan the operational and calibration checks to be used. Describe the mechanical structure of the hi-vol. EPA requires it to be equipped with a motor/blower, flow calibrations controller, etc. Also, specify the maintenance schedule for the hi-vol.
17. Describe how the sample period, project duration, etc., will be determined for the study. Give the calibration procedures for the hi-vol. Include in the plan if particulate analysis will be done. Specify how SSI sampling will be done.
18. Describe how the hi-vol will be modified for PUF sampling.
19. ESD will provide an alternate method for the soil head space survey.
20. Specify the type of tubing to be used in the soil gas survey. EPA requires TFE. Specify equilibration time.
21. Specify decontamination procedures for soil-gas equipment.
22. Include in the plan the air monitoring equipment to be used, if any, during the soil-gas survey.
23. Specify the volume of soil.
24. Specify what soil-gas procedures will be used.
25. Decontamination procedures in the plan for drilling equipment must include sandblasting all rust, soil, etc.
26. The method for collecting VOAs must be altered to conform to EPA methods.
27. The referenced QA/QC Procedures Manual must be included for EPA review.

As was discussed at the project manager's meeting, a separate meeting to clarify exact requirements by ESD has been scheduled for April 20, 1990, in Athens, Georgia.

Please contact Nancy Dean of my staff at (404) 347-5059 for additional information on the meeting.

Sincerely yours,

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

cc: Ron Joyner, NAS Pensacola
Eric Nuzie, FDER
James Malone, NAVFAC-ENGCOM