UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAY 15 1998

4WD-RCRA&FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Suzanne Sanborn
Remedial Activities Branch
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 10068
Charleston, South Carolina 29411-0068

Re: NAS Pensacola NPL Site
Pensacola, Florida

Dear Ms. Sanborn:

We have received your request for review of the proposed modifications to the Work Plan and the original (approved) Work Plan for sites 25 & 27 at the subject site.

I have enclosed the Agency's comments on your proposal. The activities suggested in these modifications should be closely monitored by personnel skilled in air or radiation monitoring. EPA would like a detailed schedule in order to coordinate oversite and sampling with our Montgomery lab. (NAREL).

Please feel free to contact me at 404/347-3016 should you have any further questions regarding this matter.

Sincerely yours,

Michelle M. Clemons

Allison W. Drew, RPM
Department of Defense Remedial Unit
RCRA & Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDER
Jon Richards, EPA
Sharon Matthews, EPA

Sections 1 and 2: Ro comment.

ection 3
g 3-1: It is not clear why the number of drums stored at Site 25, or the methods used for disposal have not been delineated considering this site has been in oparation since 1975.

pg 3-2: If "The spill was reported to have been properly cleaned up, however, the procedure used for removal of the spill and the length of time between the spill and the clean up operation is not known", then how can the study conclude that "...because the material was ... properly cleaned up..."?

pg 3-3: Why is the disposal location of the Building 709 demolition debris not known considering that this debris was radioactively contaminated?

Why were no samples ever collected by RASO to determine the extent of the contamination?

Sections 4, 5, 6: No comment.

Section 7
pg 7-6: "...however, a generally southward flow is expected under ambient conditions'. Define 'ambient" as it is used here.

ections 8, 9, 10, 11; 12, 13: No comment.

Section 14
pg 14-2: Section 9.1 of the GQAPP was not included for review.

What is the radiation alert instrument referenced here?

pg 14-3: What is the rationale for only monitoring with the gama scintillation detector at ground level? Considering that gross alpha is a potential problem at these sites, what type of monitoring device will be used?

pg 14-4: References to air monitoring should be reviewed by the ESD Air Compliance Unit or the EPA-Atlanta Air Compliance Branch.

pg 14-7: What statistical procedure will be used to determine if a sample is above background levels?

pg 14-8: Soil samples for VOCs should not be composited but collected as grab samples to prevent volatilization of the sample.

pg 14-9: Table 14-1 ddes not include the sediment samples to be collected at Site 27. The three sediment samples noted in this table for Site 25 are not discussed in the text. Also, why will these samples be analyzed for the A list and not the more inclusive B list? It would appear that as much pertinent data as possible should be collected under Phase I to determine the potential contamination problem.

pg 14-11: Will the 5-f screens be able *to* detect the s' 'ers and floaters of concern at these sites?

What is the "established benchmark" referenced here7

14-15: As before, VOC samples mhould not be compositad.

pg 14-17: "Aquifer testing will be conducted in conjunction with well development to decrease the amount of potentially contaminated ground water that must be disposed of". This is not acceptable. Aquifer testing should be conducted on a well that has already been developed to get the most accurate results..

As before, the air sampling section should be reviewed by the ESD Air Compliance Unit or the EPA-Atlanta Air Compliance Branch.

pg 14-20: Section 7.0 of the GQAPP was not included for review.

It is not recommended that the well purge/development water be discharged on the ground but containerized until the analytical results are back *to* determine if there is a contamination problem.

Sections 15 thru 24: No comment.

Appendix A: Considering that radiation is a potential problem at these sites, the EPA-Atlanta Office of Radiation should also review these safety plans for adequacy.

3 of 6: The final rinse for decontamination should be with organic-free water, not distilled water.

Appendix B: The methods specified here should be reviewed by the ESD Laboratory €valuation and Quality Assurance Section.

Appendix C: No comment.

GQAPP - Section 6.0: Field Work and Sampling Procedures

Section 6.1: References to air monitoring should be reviewed by the ESD Air Compliance Unit or the EPA-Atlanta Air Compliance Branch.

Section 6.2: No comment.

Section 6.3: EPA-Atlanta Office of Radiation personnel should review this section for adequacy.

Section 6.4: See the 7-7-89 ESD memo for the inadequacies of the soil headspace survey.

Section 6.5: The soil gas survey method given here has some problems. The pipe should not be galvanized but stainless steel. Tedlar bags will allow volatiles to escape with time. Allowing 5 minutes for equilibration may cause undue volatilation of the sample. Using methanol as a rinse can be a potential safety problem in the field because of its low boiling point and it's respiratory effects.

Section 6.6: As before, VOC samples should not be composited but collected as grab samples.

Boreholes should be backfilled as per FLDER regulations.

Section 6.7: The bentonite seal should be allowed to hydrate as per the manufacturer's specifications.

Section 6.0: PVC bailers are not recommended for collecting samples.

Section 6.9: What is the rationale for not collecting the shallow water samples directly into the sample containers?

As before, VOC samples should not be composited.

Section 6.10: No comment.

Section 6.11: Table 6-2 - VOC soil samples should be collected into 2-oz (60 ml) containers.

The containers and volumes specified here should be reviewed by the ESD Laboratory Evaluation and Quality Assurance Section.

Section 6.12: Section 9.1 was not included for review. This section should be reviewed by the ESD Laboratory Evaluation and Quality Assurance Section.

February 26, 1991 E&E memo

The July 1990 Workplan and Section 6 of the GQAPP make reference to using a gamma scintillation detector, a pancake Geiger Mueller detector, an alpha scintillation detector and a micro-R-meter for radiation monitoring. This memo references a sodium iodide probe. The &PA-Atlanta Office of Radiation should evaluate these various instruments and determine which would be more appropriate for these sites.

What is the rationale for using twice the background radiation as the cut-off point for which lab will be used to analyze samples? Shouldn't any sample over background be sent to a lab equipped to deal with radiation?

It appears that CEP can only analyze for a limited number of parameters. Will the other parameters listed in Tables 14-1 and 2 as A, B, etc. be analyzed by some other lab?

What is the rationale for selecting samples for TCL analysis based on having a headspace reading exceeding 500 ppm over background?

Using a visual determination for radiation samples is not a viable option. Samples should be collected on the basis of field monitoring data.

It is not clear why non-radioactive samples will be sent to CEP when the ASC could analyze for a greater number of constituents. Also, considering that gross alpha has been a contaminant of concern in the past, it is not recommended that this be deleted from analysis.