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CERTIFIED MAIL- RETURN UPON RECEIPT

06 JUN 1991

Ms. Allison Drew
Environmental Protection Agency
Region IV
Waste Management Division
RCRA and Federal Facilities Branch
345 Courtland Street
Atlanta, Ga 30365

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NAS PENSACOLA
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**Subj: RESPONSE TO EPA COMMENTS ON THE PROPOSED APPROACH FOR
FOR PHASE I SAMPLING AT SITES 25 AND 27; CONTAMINATION
ASSESSMENT/REMEDIAL ACTIVITIES INVESTIGATIONS, NAVAL AIR
STATION (NAS) PENSACOLA, FLORIDA**

Dear Ms. Drew:

Enclosed for your review are our responses provided by Ecology and Environment, Inc. per our request to your May 15, 1991 comments on the above subject. Many of your comments were mentioned and addressed during both the January 29, 1991 Remedial Project Managers and Technical Review Committee meetings. Minutes to these meetings are also enclosed for your review. We regret that EPA was unable to attend these meetings.

The Navy appreciates your continued input into the activities at Site 25 and 27: Naval Air Station Pensacola, Florida. If you have any questions concerning our responses to your comments, please call Ms. Suzanne Sanborn (Code 18211) at (803) 743-0574.

Sincerely,

J.B. MALONE, Jr., P.E.
MANAGER, INSTALLATION
RESTORATION, EAST SECTION

Encl :

- (1) Response to EPA Comments
- (2) Minutes to the RPM/TRC
January 29, 1991 meetings

copy to:

FDER (Mr. Eric Nuzie) w/encl
NAS Pensacola (Mr. Ron Joyner, Code 18520) w/encl

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ecology and environment, inc.

316 SOUTH BAYLEN STREET, PENSACOLA, FLORIDA 32501, TEL. (904)
International Specialists in the Environment

May 28, 1991

Commanding Officer
Attn: (Code 18211)
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 10068
Charleston, SC 29411-0068

RE: Responses to BPA Comments on the Proposed Approach for Phase I Sampling at Sites 25 and 27, Contamination Assessment/Remedial Activities Investigations, Naval Air Station (NAS) Pensacola, Florida, Contract No. N62467-88-C-0200, Modification No. 9.

Dear Sir:

Pursuant to your request, Ecology and environment, Inc., (E & E) is please to provide Southern Division with responses to the U.S. Environmental Protection Agency (EPA), Region IV comments on E & E's February 26, 1991, letter outlining the proposed approach at Sites 25 and 27 for the above-referenced project. Each of the comments in EPA's May 13, 1991, letter are given below followed by E & E's responses.

Comment: The July 1990 work plan and Section 6 of the GOAPP 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 EPA-Atlanta Office of Radiation should evaluate these various instruments and determine which would be more appropriate for these sites.

Response: E & E's radiation group has recommended the use of the sodium iodide probe gamma scintillation detector as the most reliable and sensitive instrument for detecting low levels of radiation associated with Radium 226.

Comment: 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?

Response: Given that background radiation levels at NAS Pensacola are on the order of 2 to 3 microRoentgens per hour, using twice the background level for the determination of radioactivity is a very conservative approach.

Comment: 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?

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Response: CEP can analyze for the full range of parameters. Eowever, CEP is not set up to perform the analytical screening analyses listed in Table 14-1 in the work plan. During Phase I, non-radioactive samples will still be sent to E & E's ASC for analytical screening. During Phase II, CEP or some other mixed-waste laboratory will also be used for TCL analyses of any radioactive samples. Non-radioactive Phase II samples will be sent to E & E's ASC for TCL analyses as listed in Table 14-2 of the work plan.

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

Response: The purpose of the TCL analyses during the proposed approach is to characterize significant contamination in radioactive soil samples which cannot be analyzed for screening parameters by E & E's ASC. The 500 ppm criteria was proposed in order to keep to a minimum the total number of soil samples requiring TCL analyses during Phase I, yet still provide a mechanism to quantify significant contamination.

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

Response: Selecting samples for radiometric analyses on the basis of visual observations is not proposed. All soil samples will be analyzed for radiometric analyses. Samples for TCL analyses will be selected on the basis of field screening data. Eowever, should field screening methods fail to highlight any samples, visual observations will be used to select five samples per site for TCL analyses. It should be noted that this procedure applies only to samples determined to be radioactive (i.e., samples exceeding twice the background radiation levels).

Comment: 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 for analysis.

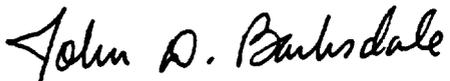
Response: CEP will perform radiometric analyses on all samples, radioactive and non-radioactive. CEP will not perform TCL analyses on non-radioactive samples. These samples will be analyzed for screening parameters by E & E's ASC. Gross alpha is not a reliable indicator of radium 226 contamination in soil. Given that this is the primary contaminant of concern at sites 2 and 27, radium 226 is the most appropriate radiometric analytical parameter.

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E & E believes these responses should clarify any concerns EPA had regarding the methods and rationale to be used during the proposed approach for Phase I sampling at these sites. If there are any questions or comments regarding these responses or other matters pertaining to the project, please do not hesitate to call me at (904) 435-8925 or Rick Rudy at (904) 877-1978.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.



John D. Barksdale, P.G.
Program Manager

JDB/mv/366

Attachment

cc: J. Wilcox; E & E--Buffalo/Central File UH8000
R. Rudy; E & E--Tallahassee/Central File UH8000
G. Gallagher; E & E--Tallahassee
C. Tronolone; E & E--Buffalo
B. Caldwell; E & E--Pensacola