



UNITED STATES ENVIRONMENTAL PROTECTIC

REGION IV

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

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NAS PENSACOLA
5090.3a

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4WD-RCRA&FFE

CERTIFIED MAIL - TURN 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, S.C. 29411-0068

RE: EPA Review of Interim Data Reports for Screening Sites: 12,
13, 14 and 24
NAS, Pensacola, Florida.

Dear Ms. Sanborn:

EPA Region IV has completed its review of the Phase I Interim Data Reports for Screening Sites 12, 13, 14 and 24 which were received in this office on June 4, 1991. Enclosed are our comments on these documents.

Based on the fact that contamination was detected and recommendations for additional field work have been provided for all four sites, an RI/FS will be required for each of these screening sites. The appropriate Operable Units must therefore be expanded to include these screening sites. All future submittals pertaining to these sites, up to and including generation of a Baseline Risk Assessment (BRA), should be submitted as Operable Unit-specific documents.

As stated in our letter of August 22, 1991, these Interim Data Reports "may be finalized in the context of the corresponding primary document" (Federal Facilities Agreement (FFA); Section VIII.B.2.), i.e. the Phase II RI/FS Work Plan. We appreciate your consideration of each of our comments in preparation of the latter document.

If you have any questions regarding these matters, please call me at (404) 347-3016.

Sincerely yours,

Allison W. Drew, RPM
RCRA & Federal Facilities Branch
Waste Management Division

cc: James Malone, SOUTHDIV
Ron Joyner, NAS
Eric Nuzie, FDER

TECHNICAL REVIEW AND COMMENTS
INTERIM DATA REPORTS (PHASE I - SCREENING)
NAVAL AIR STATION (NAS), PENSACOLA

GENERAL COMMENTS PERTAINING TO SCREENING SITES 12, 13, 14 & 24:

- 1) The Work Plans for these sites were submitted as Group-specific documents. Why weren't the Interim Data Reports also submitted according to this format? As per our telephone conversation of August 22, 1991, all of the sites contained in a given group (both RI/FS and screening) should be carried through the investigative and reporting process together. Organization of the work in this manner will permit optimal use of the "group" concept, which was created to facilitate the investigative process by combining sites with similar characteristics which will require similar investigative efforts.
- 2) Based on the fact that contamination was reported and recommendations for additional field work have been provided for all four screening sites, an RI/FS must be conducted for each of these sites. The appropriate Operable Units must be expanded to include these screening sites for all investigative and reporting purposes up through, and including, generation of a Baseline Risk Assessment (BRA). The decision of whether or not Remedial Action is necessary for each screening site will be made based on the information contained in the BRA. If determination is made that no Remedial Action is needed, a "No Further Action" ROD can be prepared, eliminating the site from further consideration.
- 3) Future screening reports should include a more comprehensive evaluation of the significance of detected contaminant concentrations. All of the appropriate APARs should be presented and compared with the data. By examining and interpreting the data from this perspective, a more complete and accurate determination can be made of the potential threat to human health and the environment and the need for further investigation.
- 4) General Comments #2-6 included in the review of the 6 associated RI/FS sites are also applicable to these 4 screening sites.

SITE 12 - SCRAP BINS

Interim Data Report

1) Page 1-1, Paragraph 1:
See comment 1 for Site 1.

2) Page 2-3, Section 2.3:
See comments 4 and 5 for Site 1.

3) Page 2-3, Section 2.4:
See comment 6 for Site 1.

4) Page 2-4, Section 2.7
If this information was given primary information in the development of placement strategies, a description of these strategies should be presented somewhere in the text.

5) Page 2-6, Section 2.9:
See comments 10 and 13 for Site 1.

6) Page 2-9, Section 2.11
See comment 17 for Site 1.

7) Page 2-10, Paragraph 1:
The wells at site 1 were tied into well GM39's elevation and the wells at site 11 were tied into well GM47's elevation. Here at site 12, the wells will be tied into monitoring well GM15 (site 11). **Why** so many different reference points?

8) Page 2-10, Section 2.13.2:
See comment 10 for Site 1.

9) Page 2-11, Paragraph 2:
See comment 21 for Site 1.

10) Page 2-11, Paragraph 3:
See comment 22 for Site 1.

11) Page 3-1, Section 3.1
Existing data analysis should have included a **discussion of** historical waste management practices and the materials **disposed**.

12) Page 3-2, Section 3.2, Paragraph 4:
The ~~HRU~~ readings referenced here were not included for review.

13) Page 3-4, Paragraph 2:
See comment 4 for Site 1.

14) Page 3-4, Section 3.4, Paragraph 2:
How will the high radiation potential near Building 3821 be addressed in the future, considering the 300 uR/h reading from the boring?

15) Page 3-8, Figure 3-3:
See comment 36 for Site 1.

16) Page 3-9, Paragraph 4:
See comments 39 and 40 for Site 1.

17) Page 3-9, Paragraph 5:
See comment 41 for Site 1.

18) Page 3-11, Paragraph 1:
What are the possible sources of the 120,000 ug/kg concentration of PCBs in sample SD001?

19) Page 3-11, Section 3.7.2:
Metals concentrations discussed are relative to the site, rather than to action levels. EPA's proposed action levels, as per the appendices contained in the proposed Subpart S rule: Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) for Solid Waste Management Units (SWMUs), must be included in the discussion.

20) Page 3-12 thru 3-19, Table 3-3:
The state action levels and the blank data should be included in this table.

21) Page 3-19, Table 3-3:
Sample B016D is listed twice. Please correct this error.

22) Page 3-23, Paragraph 2:
See comment 40 for Site 1. Also, the reference to Section 3.10.2 should be to Section 3.9.2.

23) Page 3-24, Paragraph 2:
See comment 41 for Site 1.

24) Page 3-24, Section 3.7.3, Paragraph 1:
The refernce to Appendix C should be to Appendix D.

25) Page 3-26, Table 3-5:
Include the Florida Primary Drinking Water Standards (FPDWSs) on this table.

26) Page 3-27, Paragraph 6:
See comment 48 for Site 1.

27) Page 3-30, Paragraph 1:
See comment 11 for this site.

28) Page 3-31, Section 3.8.3:
Further clarification is needed as to which samples and analytical results "other on-site metals" refers to.

29) Page 3-32, Paragraph 3:
What was the rationale for not installing temporary wells into borings B008 and B010, which, upon analysis, had the highest detected metal concentrations?

30) Page 4-1, Section 4.0:
On several occasions, in this section and throughout the text, "off-site sources", "additional sources", or "ambient sources" are mentioned but not detailed or explained. Exactly where and what might these sources refer to?

Attachment A

31) Page 1, Paragraph 1:
See comment 60 for Site 1.

32) Page 1, Paragraph 2:
See comment 61 for Site 1.

33) Page 1, Paragraph 3:
See comment 62 for Site 1.

34) Page 2, Paragraph 2:
See comment 64 for Site 1.

35) Page 2, Paragraph 3 thru 5:
See comment 66 for Site 1.

36) Page 5, Table 1:
Why aren't all samples of the same media to be analyzed for the same parameters? **Why** are only the soil samples to be analyzed for radiometric parameters? **Why** is gross alpha not on the list of analyses to be performed?

37) Page 6, Paragraph 3:
See comment 67 for Site 1.

38) Page 6, Paragraph 5:
See comment 68 for Site 1.

39) Page 7, Paragraph 1:
See comment 69 for Site 1.

40) Page 7, Paragraph 3:
See comment 70 for Site 1.

Appendices

41) Appendix B:
The 300 uR/h noted in the text was not included in this Appendix.

SITE 13 - MAGAZINE POINT RUBBLE DISPOSAL AREA

Interim Data Report

1) Page 1 (Executive Summary), Paragraph 3:
These findings ~~suggest~~ that it would be useful to group further investigation of this site with investigations for Operable Unit 10: the IWIP and associated PSCs .

2) Page 1-1, Paragraph 1:
See comment 1 for Site 1.

3) Page 1-3, Figure 1-2:
Insert the text and boundary lines for the IWIP and designate the discharge point.

4) Page 2-38 Section 2.4:
See comment 3 for site 1.

5) Page 2-3, Section 2.5:
See comment 4 for Site 1.

6) Page 2-58 Paragraph 1:
See comment 5 for Site 1.

7) Page 2-5, Section 2.6:
See comment 6 for Site 1.

8) Page 2-5, Section 2.8:
See comment 4 for Site 12.

9) Page 2-6, Section 2.9, Paragraph 1:
See comments 10 and 13 for Site 1.

10) Page 2-6, Section 2.10:
See comment 17 for Site 1.

11) Page 2-7, Section 2.11:
Wells were surveyed in relative to USGS Benchmark No. A161; sites 1, 11 and 12 all had different reference points. Will each site have its own elevation reference point?

12) Page 2-9, Section 2.12.2:
See comment 10 for Site 1.

13) Page 2-9, Section 2.13, Paragraph 2:
See comment 21 for Site 1.

14) Page 2-9, Section 2.13, Paragraph 3:
See comment 22 for Site 1.

15) Page 3-1, Section 3.1:
see comment **11** for Site **12**.

16) Page 3-2, Paragraphs 1-2:
Any idea as to what had been in the 55-gallon drums?

17) Page 3-4, Section 3.4:
See comment **3** for Site **1**.

18) Page 3-6, Section 3.5, Paragraph 2:
see comment **4** for Site **1**.

19) Page 3-6, Section 3.6:
Was the background radiation data collected for alpha, beta or gamma radionuclides?

20) Page 3-8, Paragraph 1:
How will the high radiation potential near Building 771-F be addressed in the future, considering the 100 uR/h measurement?

21) Page 3-11, Section 3.8.1.1:
See comment 19 for Site **12**.

22) Page 3-12, Table 3-3:
See comment 41 for site **1** and comment **20** for Site **12**.

23) Page 3-15, Section 3.8.1.3:
Having a laboratory-derived contaminant (methylene chloride) in so many samples indicates that the lab is using improper or inadequate QA/QC methods.

24) Page 3-18, Table 3-4:
What is the explanation for the pH of 4.12 in well TW011, when the other wells had pH's of 6.1 to 7.3 ?

25) Page 3-19, Table 3-5:
See comment **25** for Site **12**.

26) Page 3-20, Paragraph 2:
See comment **48** for Site **1**.

Attachment A

27) Page 1, Paragraph 1:
See comment **60** for Site **1**.

28) Page 2, Paragraph 1:
Justify **the** geophysical survey proposed for this **site**. The site is a rubble disposal area. If the purpose is to look for radioactive metal, then a radiation detector **should** be used rather than a metal detector.

29) Page 2, Paragraph 2:
See comment **66** for Site **1**.

30) Page 2, Paragraph 4:
See comment 67 for Site 1.

31) Page 4, Table 1:
Why aren't all samples within the same media to be analyzed for the same constituents? Also, if monitoring instruments detected up to 100 uR/H radiation, why are no radiometric analyses to be performed on any of these samples?

32) Page 5, Paragraph 1:
See comment 69 for Site 1.

33) Page 5, Paragraph 2:
Site 13 should be grouped with Operable Unit 10 for all further investigative and reporting purposes.

34) General Comment:
A Baseline Risk Assessment must be performed for Site 13. See comment 70 for Site 1.

Appendices

35) Appendix C:
How will the high radiation potential near Building 771-F be addressed in the future, considering the 100 uR/h measurement?

SITE 14 - DREDGE SPOIL FILL AREA

Interim Data Report

1) Page 1-1, Paragraph 1:
See comment 1 for Site 1.

2) Page 1-1, Paragraph 2:
A description is needed of the location **from** which the Pensacola Bay sediments were dredged. This should be **shown** on Figure 1-1. **Also**, the contaminants which may have been released into the sediments and the sources **of** the releases must be provided.

According to this paragraph, dredging occurred in the late 1970's, but on page 3-2, the second paragraph states that more dredge **spoil** disposal occurred between 1986 and 1989. Was this material stored on site from the late 1970's to the late 1980's, or was this additional material dredged between 1986 and 1989?

3) Page 2-1, Section 2.1, Paragraph 2:
Why were Stations PNB-5 and PNB-6 selected as representative of ambient Bay conditions for determining background contamination? **Are** they located near the location where the **spoil** material was originally dredged? **If** there are any sampling stations closer to the original dredging location which are representative of ambient bay conditions, this data should be used **for** determining background levels.

4) Page 2-3, Section 2.4:
See comment 4 for Site 1.

5) Page 2-4, Paragraph 1:
See comment 5 for Site 1.

6) Page 2-4, Paragraph 2:
See comment 6 for Site 1.

7) Page 2-4, Section 2.7:
see comment 4 for Site 12.

8) Page 2-5, Section 2.9, Paragraph 2:
See comments 10 and 13 for Site 1.

9) Page 2-9, Paragraph 1:
see comment 10 for Site 1. **Also**, well6 were surveyed in relative to USGS Benchmark No. A161; sites 1, 11 and 12 all had different reference points. Will each site have its **own** elevation reference point?

10) Page 2-9, Section 2.12.2:
See comment 10 for Site 1.

11) Page 2-10, Paragraph 1:
See comment 21 for Site 1.

11) Page 2-10, Paragraph 2:
See comment 22 for Site 1.

12) Page 3-1, Section 3.1:
See comment 11 for Site 1.

13) Page 3-2, Section 3.2, Paragraph 2:
Why didn't any of the air monitoring equipment pick up the strong organic odor downwind side of the ponds? Will the drum alluded to here be sampled?

14) Page 3-5, Section 3.4, Paragraph 2:
See comment 4 for Site 1.

15) Page 3-8, Table 3-1:
Why were the water levels for the 10 temporary wells collected over a period of 5 days? This is absolutely unacceptable. Water levels must be collected over as short a time period as possible. Considering the proximity of the site to the bay, they should also be measured during the same tidal phase.

16) Page 3-9, Figure 3-3:
See comment 36 for Site 1.

17) Page 3-12, Section 3.7.1.1, Paragraph 2:
There appears to be a typographical error. Zn is referred to twice.

18) Page 3-12, Section 3.7.1.2:
A table should be provided showing background sediment levels that are being used for comparison to on-site sediment samples (i.e. data for PNB-5 and PNB-6 sediment samples provided by FDER).

19) Page 3-14, Paragraph 1:
See comment 40 for Site 1.

20) Page 3-15, Table 3-3:
See comment 41 for Site 1 and comment 20 for Site 12.

21) Page 3-21, Section 3.7.2.1:
See comment 19 for Site 12.

22) Page 3-22, Figure 3-5:
See comment 43 for Site 1.

23) Page 3-23, Section 3.7.2.3, Paragraph 1:
See comment 40 for Site 1.

24) Page 3-24, Section 3.7.3.2, Paragraph 2:
See comment 48 for Site 1.

25) Page 3-26, Table 3-5:
See comment 25 for Site 12.

26) Page 3-31, Section 3.8.2, Paragraph 3:
TRPH contamination is not restricted to the settling basin, and this statement should be deleted or modified accordingly.

27) Page 3-32, Paragraph 1:
How will the assumption that the VOC contamination source may be ambient in origin be proven?

28) Page 3-32, Section 3.8.3, Paragraph 1:
PAHs were only detected in one of the two samples. The text should be corrected accordingly.

29) Page 4-1, Paragraph 2:
The PAH concentration in the sediment samples collected from the drainage channel was 4.7 ppm and should not be considered a "highly" elevated level, but only "elevated".

Attachment A

30) Page 1, Paragraph 1:
See comment 60 for Site 1.

31) Page 1, Paragraph 2:
See comment 61 for Site 1.

32) Page 1, Paragraph 3:
See comment 62 for Site 1.

33) Page 2, Paragraph 2:
Justify the geophysical survey proposed for this site.

34) Page 2, Paragraph 3:
See comment 64 for Site 1.

35) Page 2, Paragraph 4:
See comment 66 for Site 1.

36) Page 4, Table 1:
Why aren't all samples within the same media to be analyzed for the same parameters?

37) Page 5, Paragraph 4:
See comment 67 for Site 1.

38) Page 6, Paragraph 2:
See comment 69 for Site 1.

39) Page 6, Paragraph 3:
See comment 70 for Site 1.

Appendices

40) Appendix C:

Please note that the OVA was not working while drilling TW009.

SITE 24 - DDT MIXING AREA

Interim Data Report

1) Page 2 (Executive Summary), Paragraph 1:
See comment 30 for Site 12.

2) Page 1-1, Paragraph 1:
See comment 1 for Site 1.

3) Page 2-3, Section 2.4:
See comments 4 and 5 for Site 1. Why was no radiation monitoring conducted at this site?

4) Page 2-6, Section 2.8, Paragraph 1:
See comment 13 for Site 1.

5) Page 2-6, Section 2.8, Paragraph 2:
See comment 10 for Site 1.

6) Page 2-8, Section 2.10:
See comment 17 for Site 1.

7) Page 2-8, Section 2.11, Paragraph 2:
Water levels should be measured as close to each other as possible and within the same tidal phase. Please note that temporary wells for site 24 were surveyed in relative to the well elevation for GM39. Wells at site 1 were surveyed in relative to well GM39, at site 11 to well GM47, at site 12 to well GM15, at sites 13 and 14 to USGS Benchmark No. A161 and site 15 to well elevations for GM59 and GM60.

8) Page 2-10, Section 2.12.2:
see comment 10 for Site 1.

9) Page 2-10, Section 2.13, Paragraph 2:
See comment 21 for Site 1.

10) Page 2-11, Paragraph 1:
See comment 22 for Site 1.

11) Page 3-1, Section 3.1:
Existing data analysis should include a discussion of historical waste management practices and the materials disposed.

12) Page 3-2, Section 3.2, Paragraph 2:
Only the OVA readings are included in the appendix; where are the HNU readings?

13) Page 3-3, Section 3.4, Paragraph 2:
See comment 4 for Site 1.

- 14) Page 3-5, Section 3.6.2, Paragraph 2:
Please explain why it 2 days to measure water levels for 5 wells.
- 15) Page 3-7, Figure 3-2:
SEE comment 36 for Site 1.
- 16) Page 3-8, Section 3.7.1, Paragraph 2:
The methylene chloride and toluene are being written off as laboratory-derived contaminants. What future lab QA/QC will be proposed to prevent this problem?
- 17) Page 3-8, Section 3.7.1, Paragraph 3:
See comment 19 for Site 12.
- 18) Pages 3-9 thru 3-15, Table 3-2:
See comment 20 for Site 12.
- 19) Page 3-16, Figure 3-3:
See comment 43 for Site 1.
- 20) Page 3-18, Paragraph 5:
See comment 41 for Site 1.
- 21) Page 3-20, Section 3.7.2, Paragraph 2:
Aren't there only 5 temporary wells, not 10?
- 22) Page 3-22, Table 3-4:
See comment 25 for Site 12.
- 23) Page 3-23, Paragraph 1:
See comment 48 for Site 1.
- 24) Page 3-27, Section 3.8.1, Paragraph 2:
What type of air monitoring will be conducted in the future to determine if there is an ambient source of the DDT-pesticides for site 24?

Attachment A

- 25) Page 1, Paragraph 1:
See comment 60 for Site 1.
- 26) Page 1, Paragraph 2:
See comment 61 for Site 1.
- 27) Page 1, Paragraph 3:
See comment 62 for Site 1.
- 28) Page 2, Paragraph 2:
See comment 66 for Site 1.
- 29) Page 2, Paragraph 5:
See comment 67 for Site 1.

30) Page 4, Table 1:

Why **aren't** all **samples** within the **same** media to be analyzed for the **same** **parameters**? Why **aren't** radiological parameters proposed for this site?

31) Page 5, Paragraph 2:

See comment 68 for Site 1.

32) Page 5, Paragraph 3:

See comment 69 for Site 1.

33) Page 5, Paragraph 5:

See comment 70 for Site 1.

Appendices

34) Appendix C:

Please note that the highest open-borehole OVA/HNu readings ranged from 0 to 175.