



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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

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NAS PENSACOLA

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JAN 23 1992
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: Draft Final Group 0 RI/FS Work Plan (Sites 32, 33 and 35)
NAS, Pensacola

Dear Ms. Sanborn:

The Environmental Protection Agency (EPA) has reviewed the Draft Final Group 0 Work Plan for NAS, Pensacola received in this office on January 9, 1992. EPA is hereby conditionally approving the work plan contingent on satisfactory incorporation of the attached comments into the final document. In accordance with Section VIII.I. of the FFA, the Navy must supply us with either (i) written assurance that the attached concerns will be satisfactorily incorporated or (ii) a Final RI/FS Work Plan for Group 0 which incorporates these concerns, by February 9, 1992. If the final work plan cannot be provided by this date, your reponse must include an anticipated document submittal date.

Also, please provide us with a formal schedule of Navy's anticipated start date for field work at these sites, including the dates and time periods for all events which will precede this start date.

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

Sincerely yours,

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

Enclosure

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDER

TECHNICAL REVIEW AND COMMENTS
DRAFT FINAL GROUP O WORK PLAN, JANUARY 1992
NAVAL AIR STATION (NAS), PENSACOLA
PENSACOLA, FLORIDA

1. Page 2-3, Figure 2-2:

This figure shows an IWTP discharge pipe leading to Pensacola Bay. Information concerning the effluent discharged to the Bay (presumably under an NPDES permit) and any previous permit violations that might affect the nearshore sampling of surface water and sediment in conjunction with Site 13 should be included in the work plan.

2. Page 3-4, Paragraph 1:

This section states that "stormwater drainage directs flow towards the small ditch...which drains to Pensacola Bay and Bayou Grande", while Figure 2-2 shows the drainage ditch leading only to Pensacola Bay. Please correct this discrepancy.,

3. Page 5-5, Section 5.1.7:

A recent aerial photograph should be used in conducting the habitat/biota survey in order to generate a schematic map showing the locations of the different habitats at the Group O sites and adjacent areas.

4. Page 5-6, Section 5.2:

A sit&-specific background sample must be collected for surface water and sediment if an acceptable location can be identified.

5. Page 5-18, Paragraph 1:

It is unlikely that the proposed monitoring wells will provide adequate information to "determine the full [i.e. lateral/vertical] extent of groundwater contamination" (as per p. 4-2 of the work plan). At a minimum, 3 wells must be installed in the low permeability zone and 3 in the main producing zone. Ideally, these wells should be clustered with wells penetrating the surficial zone and installed in areas where deeper contamination is more likely (i.e. locations displaying elevated contamination in the surficial zone). Locations should also be selected to maximize the amount of information available on the direction of groundwater flow in these zones.

6. Page 5-22, Paragraph 3:

The proposed short-duration pumping tests are a good approach for estimating aquifer properties at specific points in the surficial zone. However, at least one long term aquifer test must be conducted on the unconfined surficial zone in order to determine the specific yield of the aquifer and the effects of any hydrologic boundaries. This data is needed in order to adequately assess potential contaminant migration and to perform contaminant transport modeling.

Furthermore, it is unlikely that the interaction between the surficial zone and the main producing zone will be observed after 8 hours of pumping. A 48-hour aquifer test (24 hours of pumping and 24 hours recovery) must be conducted in the main producing zone to determine the aquifer characteristics, the leakage rate between the zones, and any boundary effects within the major producing zone. This information is necessary for determining the fate and transport of contaminants in the horizontal and vertical directions and eventually for selecting appropriate remedial alternatives.

The details of these long term aquifer tests (pumping rate, duration, location of pumping and observation wells, etc.) should be submitted as an addendum to the present work plan as soon as the information needed to provide specific design details becomes available.

7. Page 5-23, Paragraph 1:

In order to improve the accuracy and usefulness of the specific capacity test results, the wells should be developed and the water level allowed to recover prior to conducting the test.

8. Page 5-25, Section 5.2.10.2:

Once final procedures for the disposal of investigation-derived waste are established these should be included as an appendix to the work plan. These procedures must be established and approved by EPA and FDER prior to the initiation of the Group 0 field investigation.

9. Page 5-27, Section 5.5:

The Baseline Risk Assessment must also follow EPA's 1989 document entitled: Risk Assessment Guidance for Superfund: Volume II - Environmental Evaluation Manual (Interim Final).

10. Page 5-28, Section 5.5.1:

The reference to indicator chemicals is not appropriate for site characterization and risk assessment purposes and must be deleted.

11. Page 5-29, Section 5.5.3:

While it is true that toxicity assessment for human health concerns generally relies upon existing toxicity information, a toxicity assessment for the biota may involve toxicity testing (e.g. bioassays, chemical analysis of tissues) if the existing toxicity information is insufficient.

12. Page 5-30, Paragraph 2:

IRIS should be used for the Toxicity Assessment (Section 5.5.3). Please move this reference to the appropriate section.

13. Page 7-2, Project Schedule:

The proposed investigative schedule is overly lengthy and must be significantly reduced. The time required to complete the individual tasks listed must either be reduced or run concurrently with other tasks.

Treatability studies should begin as early as possible. If they are not started until after all data collection efforts are complete, they will either delay the entire project or not be available for use in the Feasibility Study.

The exposure assessment is part of the Baseline Risk Assessment. The information needed to perform this task will not be available until the majority of the field investigation is completed.