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UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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

4/7/92

MAR 18

4WD-RCRA/FF

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

N00204.AR.000353

NAS PENSACOLA

5090.3a

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: Conditional acceptance of Navy's decision to use PVC as
monitoring well construction material
Naval Air Station (NAS) Pensacola

Dear Ms. Sanborn:

The U.S. Environmental Protection Agency (EPA) has received and
reviewed the following document, dated January 1992:

Justification for the Use of Polyvinyl Chloride as
Monitoring Well Construction Material at Naval Air Station
Pensacola, Pensacola, Florida

As a secondary document EPA accepts the document as presented
with the understanding that the Navy will be responsible for
any and all compounds or contaminants found in association with
PVC groundwater monitoring wells at NAS Pensacola.

The EPA Region IV Standard Operating Procedures and Quality
Assurance Manual (February 1, 1991) for the selection of
monitor well materials (Appendix E, Section E.5) specifically
states that stainless steel (304 or 316) is the preferred
material for monitor wells located in areas of organic compound
contamination. However, the Navy may elect to use PVC for
monitoring well construction on a site-specific basis.

If the Navy **uses** PVC as well casing material then NAS Pensacola
will be held responsible for all risks that the use of that
casing material might cause (i.e., interferences and/or
inaccuracies in chemical analysis). All compounds found in
samples collected from the aquifer will be considered to
originate in the aquifer being monitored. EPA acceptance of
PVC **for** well casing material applies to all Operable Units for
which a Draft RI/FS Work Plan has been received and/or approved
prior to submittal of this letter (i.e., Operable Units 1
through 14).

EPA reserves the right to refuse groundwater monitoring data from groundwater wells constructed of alternate materials from those specified in the Region IV SOP/QAM whenever such construction materials could cause the groundwater monitoring data to fail to meet the necessary data quality objectives. The Navy will be notified of such situations as soon as they are apparent.

Should you have any further questions regarding this matter, please call me at (404) 347-3016.

Sincerely yours ,



Allison W. Drew
Remedial Project Manager
DOD Remedial Section

cc: Eric Nuzie, FDER
Ron Joyner, NAS Pensacola