



# ecology and environment, inc.

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September 29, 1992

Hs. Allison Drew  
Environmental Protection Agency  
Region IV  
Waste Management Division  
RCRA and Federal Facilities Branch  
345 Courtland Street, N.E.  
Atlanta, GA 30365

RE: Responses to Comments on the Draft Final Work Plans for Site Groups  
E, I, P and O, Contamination Assessment/Remedial Activities  
Investigations, Naval Air Station (NAS) Pensacola, Florida.

Dear Allison:

Enclosed are responses to comments on the Draft Final Work Plans for  
Site Groups H, I, P and Q for the above-referenced project. Ms. Linda  
Martin of Southern Division has reviewed and approved these responses.

If there are any questions concerning these comment responses or other  
matters pertaining to the project, please feel free to contact me at  
(904) 435-8925 or Rick Rudy at (904) 877-1978.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.

  
John D. Barksdale, P.G.  
Program Manager

JBD/mv/40:25

Attachments

cc: L. Martin; SouthNavFacEngCom--Charleston  
J. Wilcox; E & E--Buffalo/Central File UH8000  
G. Gallagher; E & E--Tallahassee  
C. Tronolonc; E & E--Buffalo

Attachment A

RESPONSES TO COMMENTS FROM THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV (EPA)  
ON THE DRAFT FINAL WORK PLANS FOR OPERABLE UNITS (OUs) 11-14  
SITE GROUPS E, I, P AND Q  
NAVAL AIR STATION (NAS) PENSACOLA, FLORIDA

**Comment 1:**

As indicated in our letter of June 22, 1992, Region IV defines surface soil samples as those collected from a depth range of 0-1' below ground surface (BGS). The Navy has made the appropriate corrections to two of the four work plans. EPA requests that similar corrections be made to section 14.1.3.2 of the RI/FS Work Plan for OUs 13 (Group H) and 12 (Group Q).

**Response:**

There seems to be some confusion regarding what was agreed to at the June 16 and 17, 1992, RPM meeting. The Navy agreed to change the depth interval for surficial soils from 0 to 0.5 feet to 0 to 1.0 feet. This change was based on EPA's suggestion that the 0 to 1.0 foot interval was more appropriate for risk assessment purposes. This change was not applicable to Phase I soil samples which are generally collected from the 0 to 5 foot interval, analyzed for screening parameters, and not subject to usage for risk assessment purposes. Revising these Phase I soil sample depth intervals was not discussed at the RPM meeting. Changes were made in the work plans to the applicable methodology sections. The confusion over this appears to be related to the fact that Phase I soils for Group P were never proposed for screening analyses and were originally scoped for sampling at 0 to 0.5 feet, 0.5 to 2.5 feet, 2.5 to 5.0, etc. Thus, the change to 0 to 1.0 feet was made. Similarly, because Group I is comprised of PCB sites, the Phase I soil samples were originally scoped for screening analyses of the soils at 0 to 0.5, 0.5 to 2.5, 2.5 to 5.0, etc., intervals. Thus, these sites were changed to 0 to 1.0 feet. Groups H and Q were also revised to reflect the 0 to 1.0 foot interval in Phase II. However it was not the Navy's understanding that the Phase I (screening) depth intervals for Groups H and Q were to be modified.

**Comment 2:**

The only method number listed for Total Organic Halogens in the SQAPPs for these work plans is SW9020. The apparent discrepancy between this listing and the Navy's response to our comment 49b. for the OU 13 RI/FS work plan must be clarified.

**Response:**

The method previously listed in the SQAPPs for Total Organic Halogens, as well as the Navy's response to comment 49b. were incorrect. The correct method for this analysis is SW9020 which is consistent with the Generic Quality Assurance Project Plan. As a result, the SQAPPs in the draft final work plans were changed to show method SW9020.

Attachment B

RESPONSES TO COMMENTS FROM THE  
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION (PDER)  
ON THE DRAFT FINAL WORK PLANS FOR OUs 11-14  
SITE GROUPS E, I, P AND Q  
NAVAL AIR STATION (NAS) PENSACOLA, FLORIDA

Comment 1:

As discussed during the RPH Meeting of June 16 and 17, the Department would like to do away with compositing soil samples over five foot intervals. Based on EPA's definition of surface soil samples as those obtained from 0 to 1 feet below land surface, it was agreed that corrections would be made to all the groups, however, those corrections seem to be missing from Groups H and Q. Please correct Sections 14.1.3.2 accordingly.

Response:

There seems to be some confusion regarding what was agreed to at the June 16 and 17, 1992, RPM meeting. The Navy agreed to change the depth interval for surficial soils from 0 to 0.5 feet to 0 to 1.0 feet. This change was based on EPA's suggestion that the 0 to 1.0 foot interval was more appropriate for risk assessment purposes. This change was not applicable to Phase I soil samples which are generally collected from the 0 to 5 foot interval, analyzed for screening parameters, and not subject to usage for risk assessment purposes. Revising these Phase I soil sample depth intervals was not discussed at the RPM meeting. Changes were made in the work plans to the applicable methodology sections. The confusion over this appears to be related to the fact that Phase I soils for Group P were never proposed for screening analyses and were originally scoped for sampling at 0 to 0.5 feet, 0.5 to 2.5 feet, 2.5 to 5.0, etc. Thus, the change to 0 to 1.0 feet was made. Similarly, because Group I is comprised of PCB sites, the Phase I soil samples were originally scoped for screening analyses of the soils at 0 to 0.5, 0.5 to 2.5, 2.5 to 5.0, etc., intervals. Thus, these sites were changed to 0 to 1.0 feet. Groups H and Q were also revised to reflect the 0 to 1.0 foot interval in Phase 11. However it was not the Navy's understanding that the Phase I (screening) depth intervals for Groups H and Q were to be modified.

Comment 2:

As agreed during the June 16-17 RPM Meeting, the Department would conditionally approve the Draft Final RI/FS Work Plans if fieldwork related issues had been taken care of. With the exception of the comment referenced above, and since our comments issued on November 4, 1991 have been adequately addressed, the Documents should be considered approved. Please note, as agreed during the June 16-17 RPM Meeting, the work plans regarding this batch will be discussed amongst the three FFA parties prior to field work initiation to assure expediency and to prevent any misunderstandings regarding the assessment approach and Data Quality Objectives.

Response:

Comment noted