



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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NAS PENSACOLA
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CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ms. Linda Martin
Remedial Activities Branch
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston, South Carolina 29411-0068

Re: Review of Response to Comments for Sampling and Analysis Plan (SAP) for Operable Unit 10;
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Ms. Martin:

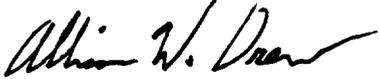
The Environmental Protection Agency (EPA) has completed its review of the the Navy's Response to Comments for the Sampling and Analysis Plan (SAP) for Operable Unit 10. The vast majority of EPA's comments have been adequately addressed in the Navy's written responses and in the revised version of the SAP which was submitted along with these responses. However, the following issues must be addressed in the Draft Final SAP in order for EPA to approve this document.

1. Regarding Specific Comment 1: Site 13 is an RI/FS site. EPA conditionally approved the RI/FS work Plan for this site on September 1, 1992. Final approval of this work plan is contingent upon EPA receipt and approval of a Sampling and Analysis Plan for Site 13. Until the SAP is approved, any work done at this site will be at the Navy's risk. Since Site 13 has been designated part of OU 10, the necessary information should either be incorporated into, or amended to, the present SAP for OU 10.
2. Regarding Specific Comment 4: The technical justification provided for use of a carbon filter to screen for natural methane and hydrogen readings is inadequate. EPA is unaware of any evidence or documentation indicating that this device acts as a preferential filter for the two compounds mentioned. While the Navy may elect to record both readings, EPA will not consider the filtered results and only unfiltered readings may be used to select sampling locations for the collection of higher DQO Level samples.
3. Regarding Specific Comment 6: EPA recommends that the soil gas groundwater samples collected for VOC analysis be submitted to a CLP laboratory for DQO Level III or IV analysis instead of being analyzed via field GC. Additional compound/analyte fractions (e.g. metals, BNAs) should also be submitted for CLP analysis if sample volumes

permit. If this is not feasible due to budgetary or other constraints, a minimum of 20% of the groundwater samples collected should be analyzed by a CLP lab at the higher DQO level. In particular, groundwater samples from areas where soil gas readings exhibit low or borderline concentrations should be submitted to a CLP lab for confirmation purposes. Groundwater samples for CLP analysis should also be collected from 10-20% of the sampling points where soil gas readings indicate an absence of contamination, also for confirmation purposes. Finally, a description of the heated headspace analytical method was not provided in Appendix B. Please provide this information so that EPA can review and evaluate the adequacy of this method.

EPA looks forward to approving a revised Draft Final SAP for Operable Unit 10 upon receipt. Should you have any questions or concerns regarding these matters, please contact me at 404/347-3016.

sincerely yours,



Allison W. Drew, RPM
Department of Defense Remedial Section
Federal Facilities Branch

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