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April 16, 1993

Florida Department of Environmental Regulation
Federal Facilities Coordinator
Attn: Eric Nuzie
Twin Towers Office Building
2600 Stone Road
Tallahassee, **Florida 32399-2400**

RE: Final Sampling and Analysis Plans, Category **II:** Sites **1, 25, 27, and 39**, NAS-Pensacola,
Contract # **N62467-89-D-0318/059**

Dear Mr. Nuzie:

Enclosed please find two copies of each **Final Sampling and Analysis Plan, Remedial Investigation/Feasibility Study**, for Category **II:** Sites **1, 25, 27, and 39** for the Naval Air Station Pensacola in Pensacola, **Florida**.

If you should have any questions or need any additional information regarding the plan, please do not hesitate to call me.

Sincerely,
EnSafe\Allen & Hoshall



Henry H. Beiro
Task Order Manager

Enclosure
Final Sampling and Analysis Plans

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Category II

Sites: **1, 25, 27,** and 39
Pensacola Naval Air Station

GENERAL COMMENT

Sites 1, 25, and 27 already have had Phase II workplans approved; however, the OU-10-based Sampling and Analysis Plan (**SAP**) for this category presents some changes to the sampling methodologies previously proposed in the workplans; these changes to the sampling methodologies are addressed in the specific Comments portion of this memo. In addition, since sites 25 and 27 belonged to the now defunct Group G, there is still **an** issue that needs to be resolved: In a letter issued on December 29, 1992 the Department asked the Navy to formally respond to the issue of short duration aquifer pump tests for assessment and remedial purposes. The Department approved the Phase II Workplans for Group G believing that this issue can be resolved without invoking informal Dispute Resolution; therefore, until this issue is resolved and comments presented below are adequately addressed, the documents reviewed cannot **be** considered final.

Response:

In accordance with the site-specific SAPs and work plans, slug tests will be performed at selected monitoring wells. If groundwater remediation will be **required**, the results of the slug tests will be **used** to design the appropriate pumping tests. Full-scale pumping tests (up to 48 hours) will be performed at each site with the objective of evaluating the hydraulic properties of the aquifer and underlying aquitard, the leakage between the two more permeable zones of the Sand and Gravel Aquifer, the radial influence of pumping, and any boundary effects. Pumping tests will continue until the above listed objectives are achieved. The EPA and FDER will be kept apprised of the investigation **as** it progresses, and will be notified prior to conducting full-scale pumping tests. The Navy will take technical responsibility for the design and implementation of these tests. Pumping tests will be performed in accordance with the procedures provided in Section **9.6.2** of the Comprehensive Sampling and Analysis Plan (CSAP).

SPECIFIC COMMENTS

Sites **1, 25, 27** and 39

The Navy proposes to change the RCRA-based Appendix IX analysis requirement to the CERCLA-based "Full Scan" analysis plus the collection of additional information about soil and groundwater physical parameters necessary to prepare the upcoming Feasibility Study. Given the fact that this course of action is being implemented at other NPL listed **military** facilities in the State of Florida, the proposed change is acceptable.

The Navy has changed soil sample intervals from the already approved 0.0-1.0, 1.0-2.5, 2.5-5.0, etc. feet below ground surface to continuous split-spoon sampling from ground surface to the water table (0.0-2.0, 2.0-4.0, etc. below ground surface) "to ensure a regular **and** consistent sampling interval". The Navy should be aware that during the July 14, 1992 RPM meeting, the Navy agreed to sample from 0.0-1.0, 1.0-2.5, etc. feet bgs. At that time, **FDER** and **EPA** presented technical reasons why the 0-1.0 and the 1.0-2.5 feet bgs are perhaps the most important intervals in soil sampling; furthermore, **FDER** approved the RI/FS Workplans for groups H, I, P, and Q based on this change. In addition, page 4-11 of the approved Sampling and Analysis Plan (**SAP**) for Operable Unit 10 indicates that surficial (0.0-1.0 foot bgs) will be obtained. The Department encourages the Navy to clarify its final position regarding the soil sampling intervals.

Response:

The soil sampling interval will be from 0.0-1.0 foot bgs, 1.0-3.0 feet bgs, 3.0-5.0 feet bgs etc to the water table. The 0.0-1.0 foot interval is necessary for risk assessment purposes. The remaining intervals 1.0-3.0 feet bgs, 3.0-5.0 feet bgs, etc. are required to reduce the risk of cross contamination by allocating one sample interval per 2-foot long split barrel sampler.