



DEPARTMENT OF THE NAVY

NAVY PUBLIC WORKS CENTER
310 JOHN TOWER ROAD
PENSACOLA, FLORIDA 32508-5303

32501.036
03.01.36.0015

IN REPLY REFER TO:

5090
Code 911.1
Ser 1311

JUN 16 1993

Ms. Allison Drew, RPM
U.S. Environmental Protection Agency
Region IV
4WD/FFB
345 Courtland Street
Atlanta, GA 30365

N00204.AR.000575
NAS PENSACOLA
5090.3a

Re: IR SITE 36 NAVAL AIR STATION, PENSACOLA, FLORIDA

Dear Ms. Drew:

In response to the Environmental Protection Agency's (EPA) concern over the possibility of active leaks of contaminants from the industrial waste sewer line, the Navy conducted an engineering evaluation of existing available data to assess the condition of the industrial waste line. Data from Plate 4, "Surficial Zone Water Level Elevation for Temporary Monitoring Wells" from the final draft (April 1992) of the Contamination Assessment was used to determine the depth to the groundwater. Additional data from NAVFAC drawings 5152541-46 was used to determine the corresponding depth to the industrial waste line. With this information, we determined the gravity sections of the pipeline which are above the water table and thus have the potential for exfiltration. The sections below the water table are of less concern because if leaks exist, infiltration, rather than exfiltration, would occur and we would be processing groundwater at our industrial waste treatment plant. Approximately 2,500 feet of line is above the water table. Enclosure (1) delineates the sections of the line which are above the water table.

It is the Navy's intent to modify our processes to eliminate the need for the industrial sewer line. When sections of the line are taken out of service, they will be capped at both ends and abandoned. Remediation at the industrial lines will be addressed by the record of decision for the site under the Installation Restoration Program. The Navy has taken significant steps to not only reduce the volume of waste being treated at the plant but also the toxicity. We will send a letter better detailing these actions in the near future.

Because of the size and cost of this project, it is necessary to accomplish it in phases. The phases for abandonment of the industrial waste sewer line are identified on enclosure 2. Phase 1 will abandon and cap off sections of the industrial waste line, the contributing processes of which are currently undergoing modification. Phase 2 will abandon and cap off sections of the sewer line which are above the water table. Phase 3 will abandon and cap off 2950 feet of eight-inch force main from Building 782 to Manhole A-4, Phase 4 will abandon and cap off the remaining sections of the industrial waste line. Our goal will be to completely abandon the industrial waste sewer line by December 1998.



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Re: IR SITE 36 NAVAL AIR STATION, PENSACOLA, FLORIDA

In February, the Navy, U.S. EPA, and Florida Department of Environmental Regulation (FDER) met to discuss the approach to be used to study PSC 36 IWTP sewer line. At this meeting, it was decided that the portion of the sewer line from test location 0451A to the northwest and north to the ends of the lines would become part of PSC 30. Based on an evaluation of the as-built drawings and available groundwater elevations, the portion of the sewer line that is included in PSC 30 is located above the groundwater table. The decision to move this portion of PSC 36 to PSC 30 was made because the soil and the groundwater contaminants of concern at PSC 36 are the same as those found throughout PSC 30. The groundwater flow at PSC 30 is east to the drainage ditch where the sewer line crosses PSC 30 and north to the Bayou Grande (away from the sewer line). Based on the analytical screening data and the groundwater flow direction, the Navy feels that the contaminants detected are associated with PSC 30 rather than the sewer line. We believe continuation of the Phase II sampling and analysis using validated Level III and IV data is the most appropriate method to evaluate the effects of the sewer line on contamination at PSC 30.

The operation and maintenance of the IWTP sewer line is under the responsibility of the Public Works Center (PWC) Pensacola and not part of the IR Program. Because of this, neither Defense Environmental Restoration Account (DERA) funds nor Pollution Abatement (PA) funds can be used to test the line.

We want to ensure a continuing cooperative effort between the U.S. Navy and the EPA on this matter. The point of contact for the IR comments is Linda Martin of Southern Division, Naval Facilities Engineering Command, at (803) 743-0574. The point of contact for the operation and maintenance of the IWTP sewer line at PWC Pensacola is Gary Sweppenhiser at (904) 452-8587.

Sincerely,



A. W. JOHNSON
Captain, CEC, USN
Commanding Officer

Enclosure:

- (1) Site Vicinity Map
- (2) Phases of Industrial Waste Line Abandonment

copy to:

SOUTHNAVFACENCOM (185)
NADEP Pensacola (Code 00, 60001)
NAS Pensacola (Code 00, 00500, 18520)



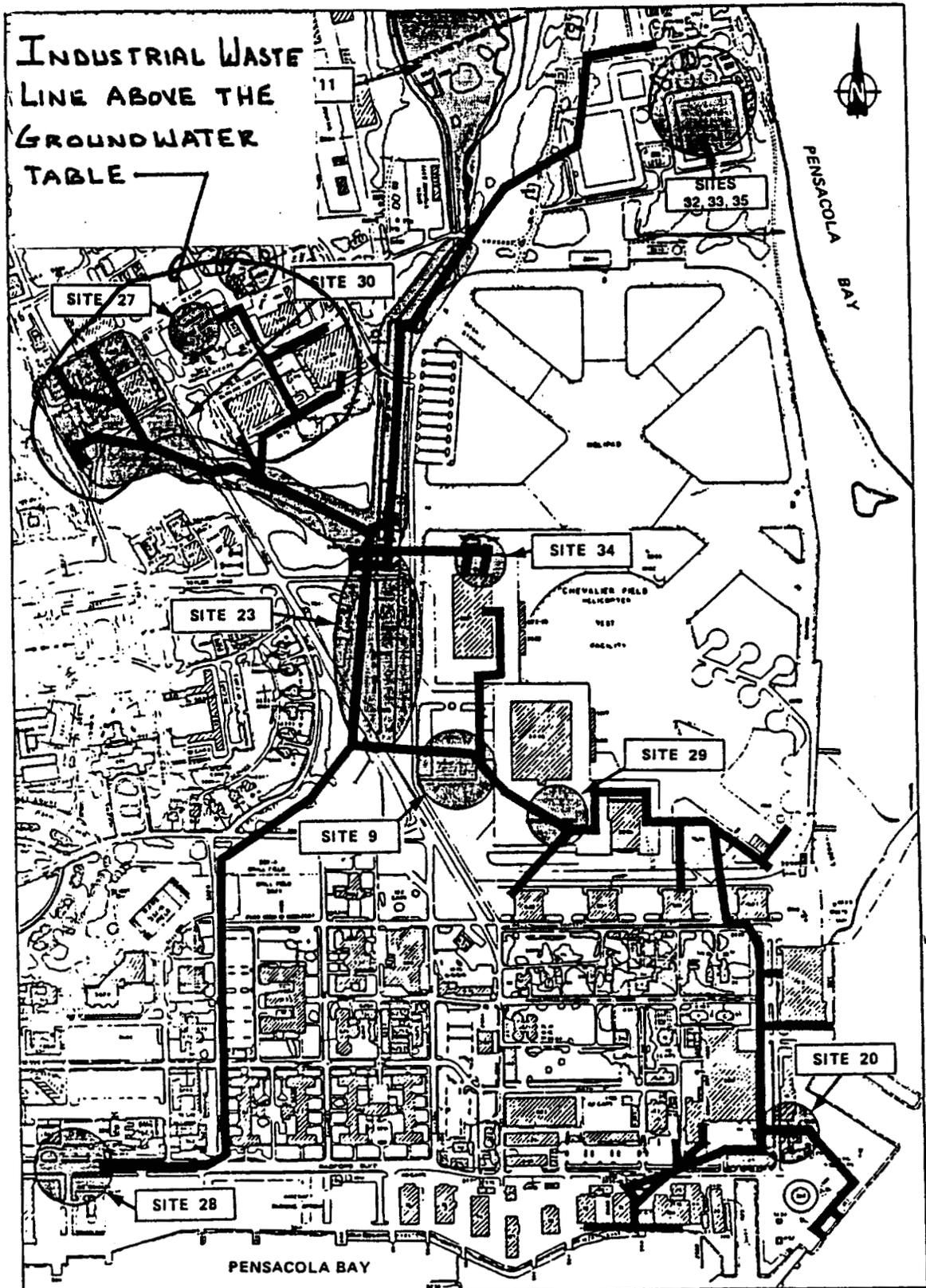


Figure 1-2 SITE VICINITY MAP - NAS PENSACOLA SITE 36



ENCLOSURE 2
PHASES OF INDUSTRIAL WASTELINE ABANDONMENT

PHASE 1: - Disconnect before 31 December 1993
includes the following buildings and lines:

<u>Building</u>	<u>Line Size</u>	<u>Line Length</u>
72, 71, 104, 44	6, 8, 12" gravity	over 700'
52	2-1/2 and 4" f.m.	amount unknown
627	2" force main	10' disconnect build
630	6" gravity	disconnect building
606	4 and 6" gravity	413' disconnect build.
pit @ 2662	6" gravity	100' disconnect pit
3819	8" gravity	130'
3557	6" gravity	956'
3220	6" gravity	20'
near 3220	4" gravity	50' fuel tank drain
3450	2" force main	unknown length
2691	4" gravity	50' disconnect build

PHASE 2:- Disconnect before 31 December 1994
gravity sewers above the groundwater table

<u>Building</u>	<u>Line Size</u>	<u>Line Length</u>
649, 692, 647, 755, 649B	4, 6, 8, 10, 12, and 15"	over 900'
3214		over 370'

Note: Abandonment of the above lines will also abandon 665' of the 15" main collector line from manhole B-7 to manhole B-3.

3220	6"	510'
741	8"	488'

Enclosure (2)



Building

Line Size

Line Length

3450

4"

200' disconnect build

Note: Abandonment of the above lines will also abandon 827' of the 15" main collector line from manhole B-3 to pump station 2.

PHASE 3:- Disconnect before 31 Decoember 1995

2950' of 8" Force Main from building 782 to manhole A-4

PHASE 4:- Disconnect before 31 December 1998

All remaining lines

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