



UNITED STATES ENVIRONMENTAL PROTECTION
REGION IV
345 COURTLAND STREET. N.E.
ATLANTA. GEORGIA 30365

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NAS PENSACOLA
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JUN 23 1993

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Attn: Ms. Linda Martin - Code 1851
SOUTHNAVFACENGCOM
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Re: Review of Draft Final Sampling and Analysis Plans (SAPs)
for Investigative Categories 2 (Sites 1, 25, 27 & 39) and 3
(Sites 2, 11, 30 & 38);
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 Sampling and Analysis Plans (SAPs) for Investigative Categories 2 (Sites 1, 25, 27 & 39) and 3 (Sites 2, 11, 30 & 38). Our comments are enclosed. With the exception of the SAPs submitted for Operable Units 5 (Sites 30 and 31) and 11 (Site 38), these SAPs will be considered acceptable upon receipt of replacement pages which address our comments. The SAPs for Operable Units 5 and 11 cannot be considered complete and acceptable until EPA receives the amendments to these SAPs which adequately address the RI/FS for those portions of the IWTP Sewer Line which the Parties have agreed to include in these Operable Units, as documented in the FY93 Site Management Plan.

To date, EPA has conditionally approved the RI/FS Work Plans for sites 1, 2, 11, 30, 38 and 39 (see correspondence dated September 1, 1992 and November 2, 1992). The Parties are also currently informally disputing the contents of the RI/FS Work Plans for sites 25 and 27. Since the SAPs are critical components of these Work Plans, in accordance with Section VIII of the Federal Facility Agreement, EPA shall withhold approval of each Work Plan until acceptable revisions of the corresponding SAPs are received. Upon receipt of an acceptable SAP for each site, EPA shall consider the RI/FS Work Plan for that site final and approved and the dispute for that site resolved.

Please provide copies of the necessary replacement pages within 30 days of your receipt of this letter. Should you have any

questions or comments regarding these issues, please contact me at 404/347-3016.

Sincerely yours,



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

Enclosure

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDER
Henry Beiro, Ensafe/Allen & Hoshall

CLARIFICATIONS AND MODIFICATIONS REQUIRED FOR DOCUMENT FINALIZATION
DRAFT FINAL SAMPLING AND ANALYSIS PLANS
CATEGORY 2 (SITES 1, 25, 27 & 39)
CATEGORY 3 (SITES 2, 11, 30 & 38)
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

1. EPA looks forward to receiving a copy of the completed well inventory which is referenced in these SAPs. Please provide 2 copies to this office within 30 days of your receipt of this letter.
2. In order to facilitate the planning and coordination of field oversight activities, and to allow EPA to provide the Parties with timely notification of its intent to perform field oversight (in accordance with Section XV. of the FFA) the SAPs must be amended to include schedules of the planned field activities for each site.
3. Most of the SAPs state that Phase I (and Phases II and III, as needed) of the ecological assessment described in Section 8.0 of the CSAP will be performed "at Site ____". Section 8.0 of the CSAP focuses primarily on the ecological assessment to be performed for Sites 40-42. The larger-scale ecological studies for these sites may be performed concurrently with the terrestrial site investigations (i.e. Sites 1-39). However, the ecological assessments for Sites 1-39 should be limited to the identification and evaluation of ecological impacts which occur within site boundaries. Sites 40-42 were identified to provide a means for assessing the off-site impacts of Sites 1-39. The text must be revised to clarify this point to ensure that the appropriate assessments are completed, and to avoid any duplication of effort.
4. Some of the SAPs fail to incorporate the general statements in Sections 1.0 or 4.0 which provide for the investigation of additional sources or contamination identified during Phase II which were not detected during Phase I. Specifically, the SAPs for Sites 2 and 38 must be revised to incorporate these plans.
5. Table 4-1 in the SAP for Site 27 must be revised to include the DQO Levels for all sample analyses.
6. As stated in our comments on Site 30, a contaminant source was identified in the wetland adjacent to this site during ESD's field oversight investigation, (Summer 1992). Unless adequate justification is provided, this known source area must be removed prior to initiating further investigation of the wetland and associated drainage ditch. As long as the source remains, it will likely be difficult or impossible to determine whether, and to what extent, any additional sources are impacting this wetland. Also, if additional sources are present, removal of the known source area will enable the Navy to determine, in the next field effort, whether the cumulative impact of remaining sources on human health and the environment is sufficient to warrant remedial action. The known contaminant source is a localized structure and can probably be readily removed without causing significant physical damage to the wetland.