



EnSafe / Allen & Hoshall

a joint venture for professionals

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July 23, 1993

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NAS PENSACOLA
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U.S. Environmental Protection Agency

Attn: Ms. Allison Drew
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Responses to the Clarifications and Modifications
Draft Final Site-Specific Sampling and Analysis Plans
Categories 2 (Sites 1, 25, 27 and 39) and 3 (Sites 2, 11, 30 and 38)
NAS Pensacola
Contract # N62467-89-D-0318/CTO-058 and CTO-059

Dear Ms. Drew:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit seven copies each of the Responses to the Clarifications and Modifications required for document finalization for the Draft Final Site-Specific Sampling and Analysis Plans for Categories 2 (Sites 1, 25, 27 and 39) and 3 (Sites 2, 11, 30, and 38) at the Naval Air Station Pensacola in Pensacola, Florida. Also enclosed are replacement pages for the Site-Specific Sampling and Analysis Plans. Please replace the pages previously submitted with the pages enclosed.

Please let us know if you have any questions or comments regarding the plans.

Sincerely,

EnSafe/Allen & Hoshall

Allison L. Dennen
Project Geologist

Paul V. Stoddard
Technical Director

Enclosures

cc: EnSafe/Allen & Hoshall file
Linda Martin, SOUTHNAVFACENGCOM — 2 copies
Ron Joyner, NASP - 13 copies
Tom Moody, FDER - 1 copy
John Mitchell, FDNR - 1 copy
Waynon Johnson, NOAA - 1 copy
Lynn Griffin, FDNR - 1 copy

**U.S. ENVIRONMENTAL PROTECTION AGENCY
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**

Comment 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.

Response:

Two copies of the well inventory were submitted on July 8, 1993. The well inventory survey is an ongoing project and will be periodically revised.

Comment 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.

Response:

Enclosed is the requested schedule of field activities. All dates are tentative and may be revised in the future.

Comment 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** focuses primarily on the ecological assessment to 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.

Response:

Phase I ecological assessments will be performed at all sites. Data obtained during the Category 2 and 3 investigations will be used in assessing ecological risk.

Comment 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.

Response:

Agreed. The statements providing for the investigation of additional sources or contamination have been added to the SAPs for Sites 2 and 38.

Comment 5:

Table 4-1 in the SAP for Site 27 must be revised to include the DQO Levels for all sample analyses.

Response:

Agreed. The table has been revised to include DQO levels.

Comment 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.

Response:

The wetland adjacent to Site 30 is part of the Site 41 investigation. The Site 30 investigation will proceed as scheduled. However, samples will be collected from the potential source area to confirm contamination, and an immediate removal plan will be submitted in the fall, if necessary.

Schedule Name : CAT-2&3
 Responsible : HENRY H. BEIRO
 As-of Date : 31-Mar-93

Schedule File : CAT-2&3

FIELD WORK AND REPORT WRITING TASKS

Task Name	Start Date	End Date	Duratn (Days)	Pct Achvd
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CATEGORY II	24-May-93	23-Nov-93	129.0	0
Site 1	24-May-93	17-Nov-93	125.0	0
GW well inst/dev	24-May-93	6-Jul-93	30.0	80
Trenching	2-Aug-93	27-Aug-93	20.0	0
cadastral survey	30-Aug-93	11-Oct-93	30.0	0
slug/pump test	12-Oct-93	1-Nov-93	15.0	0
GW sample	7-Jul-93	3-Aug-93	20.0	0
data valdt	1-Sep-93	29-Sep-93	20.0	0
BRA	30-Sep-93	20-Oct-93	15.0	0
internal drft	21-Oct-93	17-Nov-93	20.0	0
Site 39	24-May-93	9-Sep-93	76.0	0
soil boring	24-May-93	25-May-93	2.0	100
GW well inst/dev	26-May-93	7-Jun-93	8.0	100
cadastral survey	12-Jul-93	6-Aug-93	20.0	0
slug/pump test	12-Jul-93	16-Jul-93	5.0	0
GW sample	8-Jun-93	8-Jun-93	1.0	100
data valdt	8-Jul-93	21-Jul-93	10.0	50
BRA	22-Jul-93	11-Aug-93	15.0	0
internal drft	12-Aug-93	9-Sep-93	20.0	0
Site 25/27	1-Jun-93	23-Nov-93	124.0	0
SOV	1-Jun-93	14-Jun-93	10.0	100
soil boring	7-Jun-93	2-Jul-93	20.0	50
rad. survey	7-Jun-93	11-Jun-93	5.0	100
GW well inst/dev	14-Jun-93	12-Jul-93	20.0	50
cadstral survey	13-Jul-93	9-Aug-93	20.0	0
slug/pump test	10-Aug-93	16-Aug-93	5.0	0
GW sample	13-Jul-93	2-Aug-93	15.0	0
data valdt	31-Aug-93	28-Sep-93	20.0	0
BRA	29-Sep-93	26-Oct-93	20.0	0
internal drft	27-Oct-93	23-Nov-93	20.0	0
CATEGORY III	26-May-93	2-Mar-94	191.0	0
Site 11	26-May-93	7-Jan-94	153.0	0
SOV	26-May-93	9-Jun-93	10.0	0
Trenching	26-Jul-93	13-Aug-93	15.0	0
GW well inst/dev	16-Aug-93	17-Sep-93	24.0	0
cadastral survey	20-Sep-93	15-Oct-93	20.0	0
slug/pump test	20-Sep-93	24-Sep-93	5.0	0
GW sample	20-Sep-93	29-Sep-93	8.0	0
data valdt	28-Oct-93	17-Nov-93	15.0	0
BRA	18-Nov-93	3-Dec-93	10.0	0
internal drft	6-Dec-93	7-Jan-94	20.0	0
Site 30/31 & sewer	2-Jun-93	18-Feb-94	179.0	0
SOV	2-Jun-93	29-Jun-93	20.0	0
drilling prep	30-Jun-93	9-Jul-93	7.0	0
soil boring	12-Jul-93	3-Aug-93	17.0	0
GW well inst/dev	4-Aug-93	22-Sep-93	35.0	0

Schedule Name : CAT-2&3
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 As-of Date : 31-Mar-93

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FIELD WORK AND REPORT WRITING TASKS

Task Name	Start Date	End Date	Duratn (Days)	Pct Achvd
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cadastral survey	23-Sep-93	20-Oct-93	20.0	0
slug/pump test	23-Sep-93	16-Nov-93	39.0	0
GW sample	23-Sep-93	20-Oct-93	20.0	0
data valdt	18-Nov-93	17-Dec-93	20.0	0
BRA	20-Dec-93	21-Jan-94	20.0	0
internal drft	24-Jan-94	18-Feb-94	20.0	0
Site 2	2-Aug-93	2-Mar-94	145.0	0
sediment map	2-Aug-93	20-Aug-93	15.0	0
WQ stations	23-Aug-93	4-Oct-93	30.0	0
chemical sample	5-Oct-93	1-Nov-93	20.0	0
data valdt	2-Dec-93	5-Jan-94	20.0	0
BRA	6-Jan-94	2-Feb-94	20.0	0
internal drft	3-Feb-94	2-Mar-94	20.0	0
Site 38	21-Jun-93	22-Dec-93	129.0	0
SOV	21-Jun-93	2-Jul-93	10.0	0
soil boring	12-Jul-93	23-Jul-93	10.0	0
GW well inst/dev	26-Jul-93	20-Aug-93	20.0	0
cadastral survey	23-Aug-93	20-Sep-93	20.0	0
slug/pump test	23-Aug-93	27-Aug-93	5.0	0
GW sample	23-Aug-93	27-Aug-93	5.0	0
data valdt	28-Sep-93	25-Oct-93	20.0	0
BRA	26-Oct-93	22-Nov-93	20.0	0
internal drft	23-Nov-93	22-Dec-93	20.0	0