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NAS PENSACOLA
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September 29, 1993

U.S. Environmental Protection Agency
Attn: Ms. Allison Drew
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Response to Comments
Comprehensive Sampling and Analysis Plan
NAS Pensacola
Contract # N62467-89-D-0318/CTO-036

Dear Ms. Drew:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit **seven copies** each of the Response to Comments for the Comprehensive Sampling and Analysis Plan at the Naval Air Station Pensacola in Pensacola, Florida. The Navy is in agreement with the July 7, 1993 USEPA letter for (i) the schedule for CSAP finalization, and (ii) the Navy proposes to extend the period of informal dispute on the "Batch 2" RI/FS Work Plans to the anticipated date of CSAP approval, December 16, 1993.

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

Sincerely,

EnSafe/Allen & Hoshall

Allison L. Dennen
Project Geologist

Henry H. Beiro
Task Order Manager

Enclosures

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

Florida Department of Environmental Protection
Technical Review and Comments
Draft Comprehensive Sampling and Analysis Plan (CSAP)
Naval Air Station (NAS) Pensacola
Pensacola, Florida

Comment 1 - **Section 1.0 (Introduction):**

The second paragraph on page 1-1 states, "The analytical tasks will be performed by a USEPA Contract Laboratory (CLP) approved laboratory." Many of the Florida Surface Water Quality Standards and Ambient Water Quality Standards for some contaminants of concern are well below the CLP detection limits. This is also true for the "To Be Considered (TBC)" ER-L and ER-M values for sediments suggested by the National Oceanic and Atmospheric Administration (NOAA) (Long and Morgan, 1991). We suggest the detection limits be lowered to adequately address these standards and TBC values.

Response:

The Navy will be submitting trigger level values for joint approval and subsequent use. If needed, the detection limits of the chemical analysis will be lowered to be commensurate with the trigger levels. However, the added cost should be weighed against the usefulness of the analytical data in determining ecological risk.

Comment 2 - **Section 2.2 (General Sampling Requirements)**

On page 2-2, the next to last bullet declares, "After collection, samples believed to be highly contaminated will be separated from the samples believed to contain trace amounts of contamination." We take issue with the word "believed."

Response:

The sentence has been revised to state 'Samples exhibiting obvious visual or olfactory contamination will be separated from the samples not exhibiting visual or olfactory evidence.'

Comment 3 - **Section 8.1.3 (Hydric Soils)**

The last sentence of the second paragraph of this section states, "Only when a hydric soil supports hydrophytic vegetation and the area has indications of wetland hydrology may the soil be classified as a wetland soil." In general we would agree with this determination. However,

the soils may be so highly contaminated that they will not support vegetation. To determine if it is a wetland soil should be based on the soils and the wetland hydrology. The vegetation would be an additional indicator.

Response:

Agreed. This statement has been changed to read 'Only when a hydric soil supports or would normally support hydrophytic vegetation and the area has indications of wetland hydrology may the soil be classified as a wetland soil.'

Comment 4 - Section 10.2 (Laboratory Analysis)

Refer to Comment #1 concerning detection limits.

Response:

If needed, the detection limits of the chemical analysis will be lowered to be commensurate with the trigger levels and water quality criteria. However, the added cost should be weighed against the usefulness of the analytical data in determining ecological risk.