UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

345 COURTLAND STREET. N.E.
ATLANTA. GEORGIA 30365

JAN 18 1994

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Attn: Mr. Bill Hill - Code 1851
Southern Division
NAVFACENGCOM
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subj: Review of Draft Sampling and Analysis Plans for Sites 3, 9, 10, 14, 29 and 34 (Category 5) and Sites 15, 17, 18, 24 and 28 (Category 6); NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) has completed its review of the Draft Sampling and Analysis Plans (SAPs) for Sites 3, 9, 10, 14, 29 and 34 (Category 5) and Sites 15, 17, 18, 24 and 28 (Category 6), which were received in this office on October 4, 1993. Our comments are enclosed. Upon receipt of revised SAPs which adequately address EPA's comments, the Agency will consider these documents for approval and finalization.

Please contact me at (404) 347-3016 if you have any additional questions comments.

Sincerely Yours,

Allison W. Drew
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDEP
Paul Stoddard, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENTS
DRAFT SAMPLING ***AND*** **ANALYSIS PLANS** FOR
SITES **3, 9, 10, 14, 29, 34** (CATEGORY **5)**
SITES 15, 17, 18, 24, 28 (CATEGORY ***6)***
NAVAL AIR STATION **(NAS),** PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS:

1. The proposed groundwater sampling locations in these site-specific SAPs are either very similar **or** identical (in the case **of** sites 3, 9, **10, 29** and **34)** to the sampling locations proposed in the Phase II **Work** Plans. These locations were based on the results of the Phase I investigations. Due to the unreliability of much **of** the Phase I data (e.g. questionable metals results due to the collection of turbid groundwater samples; questionable organics results due to poor QA/QC procedures, including the apparent use of non-organic-free water during sample collection), **it** is difficult to estimate the extent of contaminated plumes and the optimal locations for permanent monitoring locations. **It** therefore seems premature and inefficient to propose the exclusive use of permanent monitoring wells and full scan analysis, at DQO Level IV protocol, of all samples collected **from** these wells. In the absence of representative groundwater data, the proposed installation and sampling of permanent wells is likely to result in too few wells to delineate extent at some sites and excessive numbers of wells at other sites. In either case, an additional round of groundwater sampling may be necessary.

As recommended in EPA's review of the Phase II Work Plans, the collection of ground water samples using temporary, or screening, techniques (e.g. temporary wells, hydropunch, geoprobe) while following proper **QA/QC** procedures will provide representative groundwater samples in a timely manner. Use of **an** on-site mobile lab to analyze these samples (together with analysis of **a** representative percentage of splits by a full CLP lab **for** confirmation purposes) should further expedite the attainment of representative groundwater analytical results. These results can then be used to select the optimal permanent monitoring well locations needed to characterize the nature and extent of any contaminant plume, thereby assuring that groundwater contaminant Characterization and delineation will be completed in the upcoming round of field work.

Finally, as mentioned in previous reviews, full scan, DQO Level **IV** analyses are needed to confirm the nature and extent of contamination. This type **of** data is not needed to accomplish the sometimes extensive, time-consuming task of contaminant plume delineation.

2. Further justification must be provided, on a site-specific basis, for the performance of hexavalent chrome analyses. Also, there **is** no acceptable method for the analysis of hexavalent chrome in soil samples. The proposed hexavalent chrome analyses for soil and sediment samples should therefore be deleted.

3. The description of the Habitat and Biota Survey to be performed duringthese site-specific investigations indicates that the three-phased approach presented in the RI/FS Work Plana **for** the Bay, Bayou and Wetlands will also **be** followed for the terrestrial site investigations. This approach **is** acceptable, provided **it does** not significantly impact the enforceable schedules for Categories 5 and ***6*** which are contained in the Site Management Plan schedules. The **SAP** text must be revised to clarify this point.

4. The locations for background samples to **be** collected for each media must clearly indicated in a figure for each ***SAP.***

5. EPA continues to recommend the use of pure bentonite grout materials with the installation **of** PVC wells.

SPECIFIC COMMENTS:

SITE 3 - CRASH CREW TRAINING AREA

1. The investigation of these fire training pits should be straightforward, relatively quick and inexpensive. The SAP does not provide adequate information to justify the cost of performing 226 TCT/TAL analyses and installing 28 new monitoring wells. EPA recommends that VOC plume delineation be accompliehed using temporary groundwater sampling methods (e.g. piezocone/hydrocone technology) and a DQO Level II field laboratory. If the plume delineation showe the existing monitoring well system to be deficient, these deficiencies can then be corrected, DQO Level IV analyses can then be performed on samples collected from a select subset of sampling points which are strategically located to confirm the extent and maximum concentration of groundwater contamination.

SITE 9 - NAVY YARD DISPOSAL AREA

1. The proposed sampling scheme may serve to detect contamination if present. However, given the current limited knowledge regarding the nature and extent of contamination at this site, it seems unlikelythat the proposed sampling scheme will meet the stated goal of delineating the nature and extent of soil and groundwater contamination. The main objective of this investigation should therefore be to determine whether or not significant contamination is present at this site- If significant contamination is not present, the site should be NIFRAPd.

2. To determine the contaminant types and concentrations, a series of boreholes should be constructed in the fill area at locations more central than those shown in Figure 4-1. The waste should be visually characterized and sampled (if possible). Temporary groundwater sampling points should be screened below the waste and fill samples collected. If the site is established as a source, its contaminant plume should be delineated in conjunction with Sites 10, 23 and 27, using temporary groundwater sampling methods and a field laboratory.

SITE 10 - COMMODORES POND

1. See comment 1. for Site 9.

2. Even with a substantial reduction in the number of proposed samples, the desired objective of determining whether or not significant contamination exists at the site can still be met. If the site is determined to be a source area, the investigation should proceed as recommended for Site 9 (comment 2).

SITE 14 - DREDGE SPOIL AREA

1. The primart objective of this investigation should be to determine whether, in fact, the dredge spoil is a significant source of contamination. The dredge spoil should not be presented as an environmental media (Section 4.3). The number of spoil samples needed to characterize this potential source could be reduced without seriously impacting this study. If significant Contamination is not detected, this site should be NIFRAPd.

2. Additional investigation will be necessary if significant contamination is confirmed to exist within the spoil. This work should be initiated as soon as the need for it is confirmed. The following should be taken into consideration in designing any investigations aimed at delineating the extent of confirmed contamination:

A. The sampling scheme will have to be redesigned and expanded to meet the

objective of delineating the extent of soil and sediment contamination. Land surface is the interface between the spoil and the original ground topography. To determine the impact to the surface soil, samples must be specifically collected from this interface and logged as such. Also, the full extent of contamination will not be known until the adjacent sediments in Pensacola Bay are sampled.

B. The proposed sampling scheme must be revised in order to meet the goal of adequately delineating the extent of any detected groundwater contamination.

SITE 29 - SOIL SOUTH OF BUILDING 3460

1. The only potential source area mentioned in the description of the contaminants encountered at this site is the IWTP Sewer Line. Therefore, the proposed investigative plan must be considered contingent upon review of the PWC files concerning the IWTP Sewer Line.

2. If the area where the workers were chemically burned cannot be determined through the PWC files, interviews, examination of the concrete for signs of the excavation, etc., it will be necessary to systematically search for it. If it cannot be located through a systematic search, the site should be seriously considered for a NIFRAP. EPA is willing to assist the Navy in suggesting lines of inquiry for locating historical data, and implementing a systematic search if necessary.

3. Given that the source of contamination at this site has yet to be identified, it is unlikely that the proposed sampling will delineate the extent of soil and groundwater contamination.

SITE 34 - SOLVENT NORTH OF BUILDING 3557

1. Figure 4-1 does not locate the leak or the piping. The text also does not describe the leak in any detail. The type of solvent involved is not identified, nor is the reason that it cannot be identified provided. This information must be provided. During the RPM Meeting held October 13-14, 1993 at NAS Pensacola, NADEP was able to show EPA the location of the former leak. Personnel from NADEP and PWC should therefore be contacted prior to implementation of this investigation to determine the exact location and nature of this former leak.

2. The presumed direction of groundwater flow in the shallow aquifer must be presented in order for the effectiveness of the proposed investigation to be determined.

3. The discharge point of the unpaved ditch in the drainage area must be determined prior to implementing this SAP.

SITE 15 - PESTICIDE RINSATE DISPOSAL AREA

1. This *SAP* should not be implemented until it is determined (e.g. through consultation with PWC) whether building 3586 is still being "used for the storage, mixing and disposal of pesticides." (p. 5)

2. A complete list of chemicals disposed of at this facility must also be compiled prior to implementing this *SAP*.

SITE 17 - TRANSFORMER STORAGE YARD

1. One of the newer immunoassay screening kits would probably provide much better

qualitative and quantitative information than the proposed Dexsil Cl^- screening. EPA strongly recommends use of the former in selecting appropriate boring locations.

SITE 18 - PCB SPILL AREA

1. This site should first be screened with one of the newer immunoassay screening kits. The results of this screening will enable the Navy to make more informed decisions regarding the selection of final sampling locations.

SITE 24 - DDT MIXING AREA

1. Because the exact location of the site is unknown, EPA recommends that the Navy attempt to locate and utilize a soil screening technique for DDT, It is very possible that one or more of the companies which market immunoassay screening kits for PCB analysis also have kits for DDT,

SITE 28 - TRANSFORMER ACCIDENT AREA

1. See comment for Site 17.