



UNITED STATES ENVIRONMENTAL PROTECTIO
REGION IV
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ATLANTA, GEORGIA 30365

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NAS PENSACOLA
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MAY 4 1994

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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: Draft Final Sampling and Analysis Plans for Category 5
Sites; NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) is in receipt of the Draft Final Sampling and Analysis Plans for the following Operable Units and Screening Sites (Category 5):

Operable Unit 6 (Sites 9 and 29)
Operable Unit 8 (Site 3)
Screening Site 10
Screening Site 14
Screening Site 34

EPA has completed its review of these documents, and our comments are enclosed. Given that these SAPs are Secondary Documents, EPA proposes that our comments be addressed through adequate incorporation into either the Comprehensive Sampling and Analysis Plan (CSAP) or the next Primary Document to be submitted for these sites: the Draft Remedial Investigation (RI) Report. Consequently, upon EPA's receipt and approval of the CSAP, EPA shall consider the Remedial Investigation/Feasibility Study (RI/FS) Work Plans for Operable Units (OUs) 6 and 8 as final and approved. However, EPA shall not consider the RI Reports for OUs 6 and 8 for approval unless these Reports, or the CSAP, adequately address our enclosed comments on the corresponding SAPS.

Please contact me at (404) 347-3016 if you have any questions or wish to discuss these issues further.

Sincerely Yours,



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

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDEP
Brian Caldwell, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENT
DRAFT FINAL SAMPLING AND ANALYSIS PLANS (SAPS)
FOR SITES 3, 9, 10, 14, 29 & 34
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS :

1. If contaminant delineation (Phase II) proves necessary for any of these sites, it is recommended that analytical parameters be restricted to only those contaminants found above their PRGs. If at all possible, Phase II should be conducted using field analytical techniques.
2. EPA's Environmental Services Division (ESD) has recently tested a new technique for the installation of temporary wells. Basically, the well screen is filled with a round sand to just above the level of the screen. This technique has been found to greatly reduce turbidity and the amount of time involved in developing/sampling the temporary well. ESD is available for consultation concerning this method.

SPECIFIC COMMENTS:

SITE 3 (Crash Crew Training Area)

1. Page 8, Habitat and Biota Survey:
Either the CSAP or this site-specific SAP must provide a more complete description of the investigative approach(es) which will be used to complete the terrestrial ecological risk assessment for Site 3.
2. Page 9, Habitat and Biota Survey:
Please revise the text to clarify that Phase II sampling will be implemented in accordance with the final RI/FS Work Plan for OU 41, of which the CSAP and site-specific SAP are components.
3. Page 15, Paragraph 1:
It is unclear exactly how many ground water samples, particularly from temporary sampling locations, will be collected for this site. The text here states that 23 ground water samples (4 from existing wells and 19 from proposed temporary wells) will be collected. Yet Figure 4-1 (page 13) provides locations for 23 temporary wells, and Table 4-1 (page 10) states that 31 ground water samples, including 27 from temporary wells, will be collected. Please provide the exact number and locations of proposed ground water samples. Also, please provide justification for collecting what would appear to be a relatively large number of ground water samples in order to accomplish the

objectives of Phase I. It would appear that a number of these planned sampling points could be effectively deferred to the delineation portion of the investigation.

SITE 9 (Navy Yard Disposal Area)

1. Page 8, Section 4.0:

"A hydrologic and ecologic assessment will also be conducted for Site 9." A more complete description of the plans to conduct these assessments is needed. Please refer to comments 1 and 2 for Site 3.

2. Page 9, Line 1:

Use of the term "Contaminants of Concern" in this context is inappropriate and should be deleted. The term "Contaminants of Concern", or preferably "Chemicals of Concern", should be reserved for chemicals which exceed a 10^{-6} risk level or HI of 0.1 in baseline risk assessment scenarios which exceed 10^{-4} risk level or HQ of 1. Please revise here and throughout the text as needed.

3. Page 13, Figure 4-1:

Clarify whether the solid triangle is actually used to specify unpaved areas in this figure.

4. Page 14, Paragraph 2:

Why is the term "contaminant groups" used here? Does this reflect a decision to analyze for "indicator" chemicals, or perform non-chemical specific analyses (e.g. TPH) during some portion of the investigation?

5. Page 15, Paragraph 2:

According to the text, sediment samples will be collected from 13 different locations. Yet these locations are not specified on any figure, and Table 4-1 (page 10) indicates that only 1 sediment sample will be collected. Please clarify.

SITE 10 (Commodore's Pond)

1. Page 7, Habitat and Biota Survey:

See comments 1 and 2 for Site 3.

SITE 14 (Dredge Spoil Fill Area)

1. Page 15, Section 4.6:

See comments 1 and 2 for Site 3.

SITE 29 (Soil South of Building 3460)

1. Page 7, Habitat and Biota Survey:
See comments 1 and 2 for Site 3.

2. Page 8, Section 4.1:
See comment 2 for Site 9.

SITE 34 (Solvent North of Building 3557)

1. Page 8, Habitat and Biota Survey:
See comments 1 and 2 for Site 3.

2. Page 8, Section 4.1:
See comment 2 for Site 9.