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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

346 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

N00204.AR.000739

NAS PENSACOLA

5090.3a

MEMORANDUM

DATE: Fri 07 1994

TO: NAS Pensacola Team

FROM: Allison D. Humphris, RP ADH 7/7/94
DOD Remedial Section, FPB, U.S. EPA Region IV

RE: Transmittal of comments on Technical Memorandum for
Additional Sampling for NAS Pensacola Site 1

Attached are EPA's comments on the subject document. Please give me a call if you have any questions or wish to discuss these issues further. The Navy need not revise and resubmit the Technical Memorandum, given its status as a secondary document. However, in order for EPA to consider the next primary document to be submitted for these sites for approval (i.e. the RI Report), that document must address our attached comments.

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL # of pages 3

To <u>Bill Hill / Bill Gates</u>	From <u>Allison Humphris</u>
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To <u>David Clowes</u>	From
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To <u>Ron Jayner</u>	From
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To <u>Brian Caldwell</u>	From
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To <u>Henry Beiro</u>	From
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TECHNICAL REVIEW AND COMMENTS
TECHNICAL MEMORANDUM: ADDITIONAL SAMPLING FOR SITE 1
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

1. In selecting the additional locations to be sampled during this field effort, *care* should be taken to ensure that the data available for Site 1 upon completion of the RX will be adequate to characterize surface water runoff migration pathways for this site. This characterization must be included in the RI and associated BRA for Site 1.
2. As agreed to during the January 1994 RPM Meeting in Atlanta, the information obtained during this sampling effort should be adequate to perform a preliminary characterization of the wetlands adjacent to Site 1, in order to begin assessing the potential effects of Site 1 contaminants on these wetlands. If the results indicate that the wetlands have been impacted by Site 1, this impact should be described and evaluated in the RI/BRA and dealt with appropriately in the FS for Site 1. Additional characterization and remediation of the wetlands per se will be addressed in the RI/FS to be performed for OU 41: NASP wetlands.
3. According to the RI Report for Site 1 (pp. 2-6 through 2-8 and 2-10), discolored water/leachate seeps, soils and vegetation were observed in and/or adjacent to the nearby wetlands. If such conditions are observed during the additional sampling investigation, they should be used to help place sampling locations in the wetland and pond areas.
4. For Wetland 3, a surface water sediment pair should be collected near wells 01GS64/01GI65 and GM34. Also, the downstream location should have both a surface water and a sediment sample collected, since the Contamination Assessment Report (E&E, May 1991) indicated high concentrations of phenols in the downstream sediment in this pond.
5. For Wetland 4, at least one surface water/sediment pair (preferably two) should be collected here, since the Draft RI Report (pp. 2-6 through 2-8) states that landfill leachate flowed into this pond. Also, the Contamination Assessment Report indicated high concentrations of phenols in the sediment in this wetland.
6. For Wetland 15, surface water and sediment should be sampled, since this wetland is located in the direction of ground water flow and the RI Report (p. 7-2) states that there is a dry (intermittent) stream between the landfill and this pond. Also, the Contamination Assessment Report indicated high concentrations of phenols in the sediment in this wetland.
7. For Wetland 16, surface water and sediment should be sampled in the areas nearest Site 1.

8. For Wetland 1, since no channels are shown in attached figure, the sampling location is unclear. It is preferable to collect at least two surface water/sediment pairs, especially since some of the migration pathways are still unclear.

9. According to the RI Report (p. 9-5), ground water seepage was seen in the intermittent creek hading from the landfill to Beaver Pond. If this creek has not been sampled recently, it should be included in the current sampling effort.