



UNITED STATES ENVIRONMENTAL PROTECTION
REGION IV
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ATLANTA, GEORGIA 30365

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NAS PENSACOLA
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AUG 03 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 Sampling and Analysis Plans for Sites 12, 26 & 36
(BRAC-affected portion);
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 Screening Site 12 ((Scrap Bins), Remedial Investigation (RI) Site 26 (Supply Department Outside Storage) and that portion of Screening Site 36 (Industrial Wastewater Treatment Plant Sewer Line) which is being impacted by Base Realignment and Closure (BRAC) activities. Our comments are enclosed.

Regarding RI Site 26, the Parties are currently informally disputing the RI/FS Work Plan for this site. In order for EPA consider this work plan for approval, thereby resolving the dispute, a revised SAP which addresses our enclosed comments must be submitted no later than thirty (30) days from your receipt of this letter and prior to the commencement of field work.

Regarding Screening sites 12 and 36, our enclosed comments must be addressed either during field work or in subsequent reports and/or technical memorandums in order for EPA to make any decision regarding the Navy's recommendations on the final investigative or response action status of these sites. Also, an addendum to the current Site 36 SAP which addresses the remainder of Site 36 (i.e. the portion not affected by BRAC activities) must be submitted in order for EPA to consider the Site 36 SAP complete.

Please contact me at (404) 347-3016 if you have any questions regarding our comments or wish to discuss this issue further.

Sincerely Yours,



Allison D. Humphris
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS Pensacola
Eric Nuzie, FDEP
Henry Beiro, EnSafe
Brian Caldwell, EnSafe

TECHNICAL REVIEW AND COMMENTS
SAMPLING AND ANALYSIS PLANS: SITES 12, 26 & 36(partial)
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS :

1. The Sampling and Analysis Plans state that the USEPA Risk Based Concentrations (RBCs) developed by Region III and FDEP Cleanup Goals will serve as Preliminary Remediation Goals (PRGs) for soils. These documents should also specify the values which will serve as PRGs for groundwater and, if applicable, sediment and surface water. In general, groundwater data should be compared to the Safe Drinking Water Act (SDWA) Maximum Contaminant Levels (MCLs).
2. If ground water contamination, or the potential for soil contaminants to leach to ground water, is found to exist at any of these sites, it will probably be necessary to develop site-specific soil action levels for each detected contaminant. The EPA Region III RBCs may not be protective of ground water, and FDEP Cleanup Goals may be overly conservative. The need to develop these numbers and the methodology used to derive them should be presented in the appropriate Technical Memo (i.e. the memo which presents groundwater investigative results).
3. All references to the RBCs should clearly indicate which of the Region III RBCs are "applicable" (i.e., residential or industrial). The text should also clearly indicate which RBC table was used (i.e. Hazard Index of 1 or 0.1 used in calculating the RBCs, which update of the RBC table was used).
4. Use of the term "Contaminants of Concern" in these documents is not appropriate. This term, or preferably "Chemicals of Concern" (COC), 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 the text accordingly.
5. During recent Partnering Meetings, the Parties have agreed that if the contaminants detected exceed the agreed-upon PRGs, then further contaminant delineation and/or CERCLA response actions will be necessary. In order to ensure that these objectives are met, an important Data Quality Objective of these investigations should be to ensure that the laboratory quantitation limits for all analyzed samples approximate the agreed upon PRGs. The attainment of these quantitation limits is particularly critical for sites where the levels of contamination are expected to be low. If the quantitation limits obtained greatly exceed the agreed upon PRGs, then re-sampling and re-analysis may be required before final decisions regarding delineation and/or response actions can be made. The decision to re-sample and re-analyze, however, should be made on a sample-specific basis. As agreed to by the Parties during the June Partnering Meeting, Special Analytical Services

will be performed as needed to complete Phases 2 and 3 (delineation and confirmation) of these site investigations.

6. Regarding the reports to be submitted for these sites, it may not be necessary to submit a Technical Memorandum upon completion of Phase II (delineation). If Phase II results can be provided to the Regulatory Agencies in the form of tables and figures, the Parties may be able to discuss and agree upon Phase III (confirmatory) sampling locations in a meeting. Also, for screening sites, the final investigatory report submitted should be the Preliminary Site Characterization Report. For RI sites, or for screening sites which are upgraded to RI sites, the final report should be the RI Report. Only one of these two reports should be prepared for each site (i.e. as stated in the SMP, only an RI Report should be prepared for screening sites which are upgraded to RI sites).

COMMENTS APPLICABLE TO SITE 12 ONLY:

1. Section 4.3, Figure 4-1:

Please locate the sediment samples "to be collected at upstream and downstream extensions of the onsite storm drainage system and at the drainage system outfall." Is this two or three samples? Also, locate the planned surface water sample on this figure.

COMMENTS APPLICABLE TO SITE 26 ONLY:

(no specific comments)

COMMENTS APPLICABLE TO SITE 36 ONLY:

1. Section 1.0:

The current SAP deals only with that portion of Site 36 which is co-located with BRAC construction activities. The remainder of Site 36 "shall be investigated during additional phases", beginning on November 20, 1994 (per approved FY94 SMP). Plans to submit the remainder of the Site 36 SAP should therefore be provided in the present document. The complete SAP should be submitted at least sixty days prior to the field start date, in order to allow time for regulatory review and revision/approval. EPA concurrence on Navy decisions regarding the investigative status of Site 36 (i.e. NFI vs. RI) is dependent on the adequacy of the screening investigation as presented in the SAP.

2. Section 2.1:

A figure illustrating all of Site 36 should be provided in the SAP so that the relationship of the current "partial" investigation to the "full" Site 36 investigation can be determined.

3. Section 2.2:

This section should include a description of all the Navy's current plans for the sewer line (i.e. closure and associated BRAC program

activities, RCRA program requirements, any other regulatory program requirements). All such activities, which may (i) impact the Site 36 investigation or (ii) facilitate the investigation by providing additional information, should be described "up front". Unless this is done, EPA cannot guarantee that the investigations proposed in this SAP will be adequate to make final decisions regarding the investigative or response action status of Site 36. A clear understanding and coordination of the multiple ongoing activities at this site will also benefit the Navy by reducing the potential for duplicative effort or missed program requirements.

4. Section 4.3, Building 3380 Area:

"The soil contamination has been adequately addressed in ABB's Contamination Assessment Report (CAR); therefore no soil shall be sampled in the Building 3380 investigation." Adequate justification and documentation to support this conclusion must be provided in order for EPA to agree to "No Further Action" status for the soils at this location. Does the soil contamination detected at Building 3380 consist solely of petroleum constituents? Were full scan analyses performed on any of the soil samples collected from this area?

5. Section 4.4.2:

Stainless steel is recommended for the temporary wells. PVC that becomes stained or heavily scratched from repeated usage must be discarded, because it can no longer be properly decontaminated. In addition, the sand in the wells must be present above the screen and be at least 1-2 feet below the water table for the proposed method to work.
