



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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ATLANTA, GEORGIA 30365

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NAS PENSACOLA  
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SEP 3 1993

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Commanding Officer  
Attn: Ms. Linda Martin - Code 1851  
SOUTHNAVFACENGCOM  
P.O. Box 1910010  
North Charleston, South Carolina 29419-9010

Re: Review of Draft Sampling and Analysis Plan Addendums for  
Sites 30 and 38; NAS Pensacola, Florida  
EPA Site ID No.: FL 9170024567

Dear Ms. Martin:

The Environmental Protection Agency (EPA) has completed its review of the Draft Sampling and Analysis Plan (SAP) Addendums for Sites 30 and 38 which were received in this office on July 28, 1993. Our enclosed comments must be satisfactorily addressed before EPA will consider the SAP Addendums for Sites 30 and 38, as well as the associated RI/FS Work Plans, for approval.

The SAP Addendums present the Navy's planned approach to investigating the portions of the Industrial Wastewater Treatment Plant (IWTP) Sewer Line which the Parties agreed to append to RI/FS Sites 30 and 38 during the Remedial Project Managers Meeting held February 3-4, 1993 in Atlanta. While the number of planned samples along the IWTP Sewer Line has been reduced, the investigative approach is still very similar to the approach proposed by the previous contractor. As stated at the February RPM meeting, EPA strongly believes that the installation of large numbers of borings and monitoring wells along an operating sewer line, with little or no knowledge of potential areas of leakage, is not an efficient or cost-effective means for identifying and delineating contamination at this site.

In separate correspondence dated June 16, 1993, Captain A. W. Johnson of NAS Pensacola describes the Navy's plans "to completely abandon the industrial waste sewer line by December 1998". The Navy plans to cap and abandon the IWTP line in four different sections, with the final section scheduled for abandonment by the 1998 completion date. The impending abandonment of the IWTP Sewer Line may account, in part, for the Navy's unwillingness, expressed later in this letter, to locate and secure the funding needed to perform additional sewer line testing. Existing test results were also not made available for

inclusion in the subject SAP Addendums.

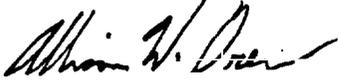
Some type of direct evidence indicating the current condition of the sewer line is needed in order to devise an effective sampling plan. A series of evenly-spaced borings will provide little information on the condition of the sewer line for points between these borings. Inferences to previously-collected data and water table levels are also not sufficient to justify a "No Further Investigation" decision for the IWTP Sewer Line. In EPA's original comments on the RI/FS Work Plan for the IWTP Sewer Line (dated August 13, 1992), we indicated a preference for excavation of the sewer line, since this would provide direct physical evidence of the condition of the sewer line and surrounding soils. Alternatively, testing results may be acceptable, since these would provide at least some information on which to base sampling locations. Such direct information must be collected in order for EPA to consider the RI Report for the IWTP Sewer Line complete. EPA reminds the Navy that the current ROD completion date for RI/FS Sites 30 and 38 is June 21, 1996.

As further stated in the correspondence from Capt. A. W. Johnson, so long as the IWTP Sewer Line remains operational, it is the responsibility of both the Public Works Center (for purposes of O&M) and the IR Program (given its status as an RI and RFI site under the Federal Facilities Agreement and RCRA HSWA Permit Number FL9 170 024 567). However, once it is abandoned, the IWTP Sewer Line shall become solely the responsibility of the IR Program (and fully subject to the aforementioned enforceable schedules). It may also become immediately subject to RCRA Treatment, Storage and Disposal (TSD) regulations. The Florida Department of Environmental Protection should be consulted on the status of the waste materials in the sewer line upon abandonment. EPA strongly encourages the Navy to proactively consider the regulatory requirements of both programs. Plans to conduct an appropriate investigative program should be established and initiated now in order to ensure continued regulatory compliance as these new requirements become effective.

The current plans for abandonment of the IWTP Sewer Line are clearly in conflict with the enforceable IR Program schedules, and may also fail to meet RCRA TSD requirements. A timely decision as to how to proceed with the investigation of Sites 30 and 38 is needed in order to assure continued compliance for these sites. EPA recommends that the Parties schedule a meeting or conference call as soon as possible upon receipt of this letter in order to resolve these issues. Please contact me at

(404)347-3016 if you have any questions regarding these issues or our enclosed comments.

Sincerely Yours,



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

Enclosure

cc: David Criswell, SOUTHDIV  
A.W. Johnson, NAS Pensacola  
Gary Sweppenhiser, NAS Pensacola  
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Paul Stoddard, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENTS  
SAMPLING AND ANALYSIS PLAN ADDENDUMS FOR SITES 30 & 38  
NAVAL AIR STATION (NAS) PENSACOLA  
PENSACOLA, FLORIDA

1. Collecting soil samples every 100 feet along the sewer line is not an effective method for detecting leaks. The Navy must wait until the video and smoke test results are available for review, and collect soil samples accordingly.
2. Placing fifteen monitoring wells along the portion of the sewer line which has been appended to Site 30, and five monitoring wells along the portion of the sewer line which has been appended to Site 38, will not provide effective monitoring. The Navy must wait until the video and smoke test results are available for review, and perform groundwater monitoring accordingly.
3. Monitoring of this unit cannot be completed until the the sewer line is out of service.