



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

345 COURTLAND STREET NE.
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NAS PENSACOLA

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

Subj: Draft Removal Action Plan for Site 36 (Building 3380);
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

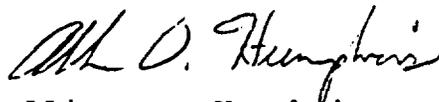
The Environmental Protection Agency (EPA) is in receipt of the draft document entitled "Remediation Work Plan, Pensacola Task 2, PSC 36, Category VIII, Building 3380". Based on the discussions at recent Partnering Meetings, it is EPA's understanding that the Navy desires to conduct a removal action to address soil contamination at the subject site. EPA has therefore reviewed this document for adequacy in meeting the requirements of a removal action plan. Our comments are enclosed. EPA shall concur with the Navy's proposed removal plans upon receipt of a revised removal action plan which adequately addresses our enclosed comments.

In general, all actions conducted at a National Priorities List (NPL) site, such as the Naval Air Station (NAS) Pensacola, must be completed in accordance with National Contingency Plan (NCP) requirements. As the lead federal agency with removal authority at NAS Pensacola, it is the responsibility of the Navy to ensure that each removal action is identified and conducted appropriately and in accordance with these requirements.

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

Sincerely Yours,



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

Enclosure

cc: Ron Joyner, NAS, Pensacole
Eric Nuzie, FDEP
Henry Beiro, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENTS
REMEDIAL PLAN - TASK 2
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

1. Title:

The current action meets the requirements of a removal action, not a remedial action. Please retitle the document accordingly, and make the appropriate corrections throughout the text. Use of the term remedial action implies that the Parties have finalized RI/FS Work Plans and Reports for this site, and that the Baseline Risk Assessment demonstrated that the contaminant levels detected at the site exceed acceptable exposure levels, thereby requiring selection and documentation of an appropriate remedial alternative in a final Record of Decision. In contrast, the Navy has the authority to conduct a removal action at any time, following site identification, in order to reduce actual or potential risks to human health or the environment, so long as that action does not impede the Navy's efforts to conduct any future investigations or remedial actions deemed necessary by the Parties (see 40 CFR Section 300.415(c)).

In general, it is important that the Administrative Record make accurate use of all CERCLA terminology. Misuse of this terminology will make it difficult for readers of the AR to accurately follow the cleanup process at NAS Pensacola and could potentially be misconstrued as an attempt on the part of the Navy to misinform the public.

2. General Comment:

All actions conducted at National Priorities List (NPL) sites, including Federal Facilities, must be completed in accordance with National Contingency Plan (NCP) requirements (see CERCLA Section 120). In the case of removal actions, it is particularly important that the appropriate type of removal action (e.g. time critical, non-time critical) be specified and justified, and that the corresponding community relations activities be completed. As the lead agency, with removal authority, it is the responsibility of the Navy to ensure that all NCP requirements are met and fully documented in the AR. These efforts will protect the Navy against future questions regarding the appropriateness and integrity of any such removal action.

3. General Comment:

All appropriate and useful information collected during the removal should be incorporated into the future documents prepared regarding the investigation and/or remediation of this site.

4. Page 20, Section 5.2.2, Paragraph 4:

In order to ensure that the treated soil meets adequate cleanup criteria for non-petroleum contaminants, it is EPA's understanding that the soils removed from the area identified as "semi-volatile organic compounds" in Figure 3-2 of this document

will be tested as specified in the November 23, 1994 letter from Henry Beiro, representing the NAS Pensacola Tier 1 Partnering Team, to B.K. Moring, Southern Division. This approach is acceptable to EPA.

5. Page 22, Section 5.2.3:

In order to ensure that all excessively contaminated soil in the vicinity of the "semi-volatile organic compounds" area is removed and treated, it is EPA's understanding that confirmatory sampling will be performed as specified in the Technical Memorandum prepared by EnSafe on December 15, 1995. This approach is acceptable to EPA provided the figure referenced in this memo illustrates the excavation area which has been previously agreed to by all parties.

Also, in order to ensure that an adequate effort has been made to locate the source(s) responsible for the solvent contamination in the groundwater adjacent to building 3380, the Navy must conduct a complete contaminant source survey (CSS) of this area, including adequate sampling and chemical analyses. An RI Report will eventually have to be prepared for this site, due to the exceedence of Maximum Contaminant Levels in several groundwater samples, and the CSS will comprise an important part of this RI Report. In order to ensure that the CSS does not adversely impact BRAC construction activities, EPA recommends that the CSS be completed and thoroughly documented for team review as soon as possible, so that the Parties can determine the adequacy of the CSS prior to the start of BRAC construction. Ideally, the Navy should take advantage of the conditions created by the present removal actions to collect the information on potential source areas (e.g. visual observations, samples for chemical analysis) which will be needed to complete the CSS. Some of the potential source(s) mentioned in documents received by EPA to date on this site include: the IW line, the bilge pipeline and the helicopter maintenance pad at building 2662.

6. Page 23, Table 5-3:

The clean soil criteria provided in this table must be revised to be consistent with the preliminary remediation goals agreed upon by the NASP Tier 1 team for use at all Chevalier Field BRAC sites.

7. Additional Data Needs:

In order to ensure adequate characterization and delineation of soils and groundwater contamination at the "Building 3380" site, several additional samples must also be collected from outside of the boundaries of the BRAC construction area:

A. The extent of contamination in the wetlands to the northeast has not been defined. Surface water/sediment samples should be collected in the wetlands area and in the drainage ditch that discharges to the wetlands. In addition, EPA recommends that the Natural Resource Trustees be consulted for any concerns that they may have regarding this portion of the site.

B. Additional subsurface soil samples must be collected to delineate the extent of soil contamination. Samples should be collected north and northeast of 36632, east of 36S25, and in the area southeast of Building 3380 where the OVA indicated volatile contamination greater than 50 ppm.

C. For the most part, the extent of the ground water contamination in the shallow zone has been defined. However, based on the levels of chlorobenzene and 1,4 dichlorobenzene detected in TW-1 and TW-2, permanent monitoring wells should be installed near TW-11 and between TW-1 and TW-13 at a depth of 35 feet. Additional wells will also be required to determine the vertical extent of ground water contamination at this site.