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NAS PENSACOLA
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January 11, 1995

U.S. Environmental Protection Agency
Attn: **Ms.** Allison Humphries
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: **Draft Final** Sampling and Analysis Plans
Sites **12** and **26**
NAS Pensacola
Contract # N62467-89-D-0318/CTO-970

Dear Ms. Humphries:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit **two** copies each of the **Draft Final** Sampling and Analysis Plans for Sites **12** and **26** at the Naval Air Station Pensacola in Pensacola, Florida.

Please let **us know** if you have **any** questions or comments **regarding** the plans.

Sincerely,

EnSafe/Allen & Hoshall

Stephen Howard
Project Geologist

Enclosures

cc: EnSafe/Allen & Hoshall file
EnSafe/Allen & Hoshall Pensacola file — 1 copy
Bill Hill, SOUTHNAVFACENGCOM — 2 copies
Ron Joyner, NASP — 6 copies
Tom Moody, FDEP — 1 copy
John Mitchell, **FDEP** — 1 copy
Waynon Johnson, NOAA — 1 copy
Lynn Griffin, **FDEP** — 1 copy

RESPONSE TO COMMENTS

Made by the U.S. Environmental Protection Agency (USEPA) - Region IV

SAMPLING AND ANALYSIS PLANS: SITES 12, 26 & 36 (partial) NAVAL AIR STATION - PENSACOLA

General Comments:

COMMENT 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 confined to the Safe Drinking Water **Act** (SDWA) Maximum Concentration Levels (**MCLs**).

RESPONSE:

The additional information will be inserted into the **SAP**. The **Preliminary** Remediation Goals (PRGs) for ground water and surface water will be the lower of the Florida **Primary** and Secondary **Drinking** Water **Standards** and the Safe **Drinking** Water Act (SDWA) Maximum Concentration Levels (MCLs), If these have not been established for a contaminant, the Florida Guidance Concentrations will be applied.

COMMENT 2:

If groundwater contamination, or the potential for soil contaminants to leach to groundwater, 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 methodology used to derive them should be presented in the appropriate Technical Memo (**i.e.** the memo which presents the ground water investigative results).

RESPONSE:

The Tier 1 Team has determined that soil leachability values will **be** developed for the base as a whole, and applied to individual sites relative to the soil **types** present. If time does not allow for the use of base-wide action levels, then site-specific action levels will **be** derived.

Site-specific soil action levels, for each detected contaminant, and the methodology used to derive them will be developed during the investigation, and included in the report which presents the ground water investigation results.

COMMENT 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).

RESPONSE.

These additions will be made. The RBCs for non-carcinogens in residential **soil** from the most recent RBC table (currently Third Quarter 1994), using a Hazard **Index** of 0.1 **shall be** applied. The RBCs for carcinogens will be **from** the most recent table in which a Hazard Index of 1 was used (currently First Quarter 1994).

COMMENT 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.

RESPONSE:

The inappropriate use of the term "Contaminants of Concern" will not **be** continued, and the text shall be revised accordingly.

COMMENT 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.

RESPONSE:

The Navy agrees that on an as needed basis, **as** agreed by the Tier 1 Partnering **Team**, special analytical services **will** be utilized to provide Quantitation Limits **necessary** to evaluate specific analytes. The Navy also wishes to remind **all** parties that **special analytical** services may not be able to evaluate low detection limits on **all** target analytes under **all** circumstances.

COMMENT 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** 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).

RESPONSE:

The comment has been noted. However Sites **12** and **26** **are** not being investigated using a phased approach. A data presentation will be provided to the Tier **1** Partnering **Team** prior to document submittal.

Unless results indicate that a **Baseline Risk Assessment (BRA)** is **necessary**, Site **12** **will remain** a screening site. Because of the proximity of Site **12** to Site **11**, it is possible that Site **12** **soil** and ground water will be separated, with soil data being presented in a **Preliminary** Site Characterization (PSC) Report, and ground water data being included in the RI Report with Sites **11, 25, 27, and 30**. If this occurs, it may be **necessary** to separate the soil and ground water into separate operable units.

Site **26** is an **RI** Site, and the soil and ground water data will be presented in the **RI Report** with Sites **11, 12, 25, 27, and 30**.

Comments applicable to Site 12 only:

COMMENT 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.

RESPONSE:

The locations of five of the **six** sediment samples is shown in **figure 4-2** of the Draft Final **SAP**; the location of the sixth sample **will** be determined during the field investigation. All sediment samples will **be** collected **from** within Site **12** boundaries. Further assessment of the storm drain system indicated that it would not be advantageous to collect sediment samples upstream and downstream of Site **12** because no storm water is flowing onto Site **12**, and the storm drains downstream of Site **12** will contain sediment derived from areas other than Site **12**. It is beyond the scope of this investigation to evaluate them.

The location of the surface water sample will be decided during the field investigation. The surface water sample will consist of surface run-off pooled after a period of rain. The purpose of this sample is to determine whether contaminants are being washed offsite with storm water.

Comments Applicable to Site 36 only:

The responses to these will be submitted with the Site 36 ~~Draft~~ Final SAP.