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NAS PENSACOLA
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January 11, 1995

Florida Department of Environmental Protection
Federal Facilities Coordinator
Attn: David Clowes
Twin Towers Office Building
2600 Stone Road
Tallahassee, Florida 32399-2400

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

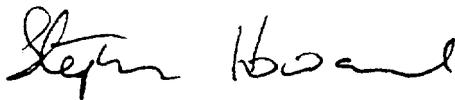
~~Dear~~ Mr. Clowes:

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 without enclosure
Bill Hill, SOUTHNAVFACENGCOM without enclosure

RESPONSE TO COMMENTS - FDEP
Made by the Florida Department of Environmental Protection (FDEP)

DRAFT SAMPLING AND ANALYSIS PLANS: SITES 12 and 26
NAVAL AIR STATION PENSACOLA

General Comments

COMMENT 1:

Sections 4.3 (Sample Location and Rationale) does not include the rationale for the number and location of samples. Normally, **this** information is provided in **workplans**; however, the workplan (E & E, 1992) proposes different locations and numbers of samples than proposed in this **SAP**.

RESPONSE

The number and locations of the samples were discussed, and **agreed** upon, in the March 1994, Tier 1 Partnering Meeting. We believe these samples **will** provide enough resolution to determine whether contaminants **are** present in the **soil** and ground water.

COMMENT 2:

The Preliminary Remediation Goals (PRGs) should include the **soil** Cleanup Goals (CGs) listed in the **FDEP** Memo dated July **5**, 1994, as well as other applicable **or** relevant and appropriate requirements (ARARs). The CGs only address **soils, so ARARs for other media**, such as the Florida Water Quality **Standards** (Chapters 17-520 and 17-550, Florida Administrative Code), should also be considered PRGs.

RESPONSE:

The Preliminary Remediation Goals (PRGs) for soils shall include the **soil** Cleanup Goals (CGs) listed in the **FDEP** Memo dated July **5**, 1994, in addition **to** other applicable or relevant and appropriate requirements (ARARs).

The Preliminary Remediation Goals (PRGs) for ground water will be 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 3:

The Contract Lab Protocol (CLP) should **be** adjusted **so** that the quantitation limits **used** for groundwater sample analysis are equal to or below Florida **Primary**, Secondary and "free from" Water Quality Standards (Chapters 17-520 and 17-550, F.A.C.).

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 4:

To expedite document review, I recommend that soil and groundwater contamination above Federal and State standards/guidelines be graphically represented **as well as** documented in the text. Separate figures for soil and groundwater are preferable to **composite** figures. If a **certain** contaminant is widespread, then an additional figure, with contours **illustrating** concentration levels, would be useful. Proposed soil and groundwater sample locations should be plotted together on another figure.

RESPONSE:

Soil and ground water data will be graphically represented when values exceed the Federal and State Standards/Guidelines. Isocons will **be used** when contamination is **widespread**.

Specific Comments

Site 12 (Scrap Bins)

COMMENT 1:

The Phase I assessment has already been completed by E & E (1991). Therefore, why will EnSafe repeat the Phase I assessment and submit a Preliminary Site Characterization Report? Was the E & E assessment not considered valid?

RESPONSE:

The work is being repeated because the data obtained during the **E & E Phase I** Assessment (1991) was for screening purposes **only**, and is not repeatable. **Also** the previous analytical work was not conducted according to Level IV protocol, and thus the accuracy of the data is difficult to verify. The E & E data will be summarized in the RI **Report**.

COMMENT 2:

With metals, **TRPHs**, **VOCs**, **PAHs**, **PCBs**, phenols and radiation **in** either soil, sediments or groundwater (Phase I study, E & E, 1991), a more thorough record search should be conducted to determine the activities that would be associated with the **release** of these chemicals in order to focus the assessment/remediation. Apparently, more than just "wet garbage" was disposed of at this site.

RESPONSE:

Agreed. At this time, this is the extent of the historical information available, however a thorough record search will be conducted during the Contaminant Source Survey (Section 3.2 of the **SAP**).

COMMENT 3:

E & E (1992) recommended that this site be upgraded in *status* for screening to RI/FS status, based on the levels and/or extent of contamination. **So**, why is **this** site still listed in the 1995 Site Management Plan as a screening site?

RESPONSE:

We have reviewed the SMPs for fiscal years **1993** and **1994**, and Site **12** was listed **as** a screening site. The purpose of the **SAP** is not to recommend site status.

E & E (1991) referred to the Contamination Assessment/Remedial Activities Investigation of Site 12 as "the first step in the completion of a Remedial Investigation/Feasibility Study for the site". However they did not recommend that the site status **be** upgraded. We believe that this reference to the site was a simple slip in terminology and not a recommendation. **Also**, we have not found any recommendations proposed by **E & E** in **1992**, that Site **12** **be** upgraded to a RI/FS site.

The Tier 1 **Team** decided during the November **2-4** meeting that the elevation **from** screening to RI **status** is dependant on the need for a baseline **risk** assessment, which is based on the Phase 1 CLP results. **This** has not been established for Site **12** yet.

COMMENT 4:

Figure **4-1** should include the location for the proposed surface water sample. If the sample is to be collected distal from the area illustrated by the figure, then **this** should **be** denoted.

RESPONSE:

The location of the surface water sample will be decided during the field investigation. The surface water sample will be collected from 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.

COMMENT 5:

If the two proposed sediment samples, at the upstream and downstream extensions of the onsite storm drainage system are located off the area illustrated by Figure **4-1**, the **figure** should **still** indicated that they will be collected, but at locations distal from the **area** illustrated by the figure.

RESPONSE:

The locations of five of the **six** samples **are** now are presented Figure **4-2** in 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.

Site 26 (Supply Department Outside Storage)

COMMENT 1:

The identification of metals, **PAH**, and TRPH in **soil** and metals and 1,1,1-trichloroethane in the groundwater during the **E & E** (1991) study should be included in **the site history**..

RESPONSE:

This additional information has now been inserted into the **Draft Final SAP**.

COMMENT 2:

If groundwater **flow** is to the east, then the locations for the proposed **monitoring** wells **are** acceptable; however, if the groundwater flow **is** in another direction, then additional monitoring wells will be necessary to delineate the extent of shallow groundwater contamination.

RESPONSE:

Agreed.