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NAS PENSACOLA
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January 23, 1995

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

Re: Draft Sampling and Analysis Plan
Site **36 IWTP** Sewer Line
NAS Pensacola
Contract # **N62467-89-D-0318/CTO-0063**

Dear **Ms.** Humphries:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit seven copies of the **Draft** Sampling and Analysis Plan for Site **36** — the **IWTP** Sewer Line at the Naval **Air** Station Pensacola in Pensacola, **Florida**. Please be advised that John Mitchell of **FDEP** had no specific comments on the **draft IWTP** Sewer Line Chevalier Field Area **SAP** submitted **May 9, 1994**. Comments from David Clowes of **FDEP** have not been received to **date**, and **are** therefore not incorporated into this **draft SAP**.

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

Sincerely,

EnSafe/Allen & Hoshall

Allison L. Dennen
Task Order Manager

Enclosure!

cc: **Mr. 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
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EnSafe/Allen & Hoshall Pensacola file

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 included in the **SAP**. The **Preliminary Remediation Goals** (PRGs) for groundwater **will** be the **Florida Water Quality Standards** and the **Safe Drinking Water Act** (**SDWA**) **Maximum Concentration Levels** (**MCLs**).

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 groundwater, 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 **groundwater** investigative results).

RESPONSE:

Site-specific soil action levels, for each detected **contaminant**, and the methodology **used** to derive them **will** be developed during Phase II of the investigation, and included in the report which presents the groundwater 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**).

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RESPONSE:

These additions will be made. The RBCs for non-carcinogens in residential soil from the most recent RBC table (currently Third Quarter 1994) shall be applied. The RBCs for carcinogens in residential soil 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 risk level or HQ or 1. Please revise the text accordingly.

RESPONSE:

The 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. The analytical laboratory will supply a comparison of instrument detection limits (IDLs) versus contract required detection limits (CRQL).

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, Phase II results will be presented to the regulatory agencies in the form of tables and figures. The final report shall be a Site Characterization Report.

Comments applicable to Site 36 only:

COMMENT 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 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**.

RESPONSE:

The Draft SAP now contains details for the entire Site.

COMMENT 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.

RESPONSE:

A site plan showing the entire Site is presented in the Draft SAP.

COMMENT 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.

RESPONSE:

Agreed. A description of all the Navy's current plans for the sewer line is included in the Draft **SAP**.

COMMENT 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?

RESPONSE:

The soil investigation at Building 3380 conducted by E/A & H is summarized in Section 2 of the **SAP**. Full scan analysis was performed on the soil samples collected.

COMMENT 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.

RESPONSE:

Your comments are noted. The PVC well screen and casing will be not be reused. Also, the temporary well design using Ottawa Sand will not be used. A Navy field study performed during the Chevalier Field area investigation found no difference in the sample turbidity from wells constructed using the Ottawa Sand and those installed using the typical temporary monitoring well design.