



EnSafe / Allen & Hoshall

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NAS PENSACOLA
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March 1, 1995

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

Re: ~~Draft~~ Final Sampling and Analysis Plans
Sites 15, 17, 18, 24 and 28
NAS Pensacola
Contract # N62467-89-D-0318/CTO-071

Dear Ms. Humphris:

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 15, 17, 18, 24 and 28 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

Brian Caldwell
Task Order Manager

Enclosures

cc: EnSafe/Allen & Hoshall file — 1 copy
EnSafe/Allen & Hoshall Pensacola — 1 copy
Bill Hill, SOUTHNAVFACENGCOM — 1 copy
Bill Gates, SOUTHNAVFACENGCOM — 1 copy
Ron Joyner, NAS Pensacola - 6 copies
Tom Moody, FDEP - 1 copy
John Mitchell, FDEP - 1 copy
Waynon Johnson, NOAA - 1 copy

U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW AND COMMENTS
DRAFT SAMPLING AND ANALYSIS PLANS FOR
SITES 15, 17, 18, 24, 28 (CATEGORY 6)
NAVAL AIR STATION (NAS), PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS

Comment 1:

The proposed groundwater sampling locations in these site-specific SAPs are either very similar or identical (in the case of Sites 3, 9, 10, 29 and 34) to the sampling locations proposed in the Phase II Work Plans. These locations were based on the results of the Phase I investigations. Due to the unreliability of much of the Phase I data (e.g., questionable metals results due to the collection of turbid groundwater samples; questionable organics results due to poor QNQC procedures, including the apparent use of non-organics-free water during sample collection), it is difficult to estimate the extent of contaminated plumes and the optimal locations for permanent monitoring locations. It therefore seems premature and inefficient to propose the exclusive use of permanent wells and full scan analysis, at DQO Level IV protocol, of all samples collected from these wells. In the absence of representative groundwater data, the proposed installation and sampling of permanent wells is likely to result in too few wells to delineate extent at some sites and excessive numbers of wells at other sites. In either case, an additional round of groundwater sampling may be necessary.

As recommended in EPA's review of the Phase II Work Plans, the collection of ground water samples using temporary, or screening, techniques (e.g., temporary wells, hydropunch, geoprobe) while following proper QA/QC procedures will provide representative groundwater samples in a timely manner. Use of an on-site mobile lab to analyze these samples (together with analysis of a representative percentage of splits by a full CLP lab for confirmation purposes) should further expedite the attainment of representative groundwater analytical results. These results can then be used to select the optimal permanent monitoring well locations needed to characterize the nature and extent of any contaminant plume, thereby assuring that groundwater contaminant characterization and delineation will be completed in the upcoming round of field work.

Finally, as mentioned in previous reviews, full, DQO Level IV analyses are needed to confirm the nature and extent of contamination. This type of data is not needed to accomplish the sometimes extensive, time-consuming task of contaminant plume delineation.

Response:

As agreed during the Partnering Meeting of January 21, 1994, the investigation of these sites has been revised into a three-phase approach. This approach incorporates many of the elements cited above, and is fully described in the revised SAPs.

Comment 2:

Further justification must be provided, on a site-specific basis, for the performance of hexavalent chrome analyses. Also, there is no acceptable method for the analysis of hexavalent chrome in soil samples. The proposed hexavalent chrome analyses for **soil** and **sediment** samples should therefore be deleted.

Response:

Hexavalent chromium has been deleted.

Comment 3:

The description of the Habitat and Biota Survey to be performed during these site-specific investigations indicates that the three-phased approach presented in the RI/FS Work Plans for the Bay, Bayou and Wetlands **will** also be followed for the terrestrial site investigations. This approach is acceptable, provided it does not significantly impact the enforceable schedules for Categories 5 and 6 which are contained in the Site Management Plan schedules. The SAP text must be revised to clarify this point.

Response:

The terrestrial site investigation will follow the three-phase approach. The Site Management Plan schedules are currently being revised, and **will** incorporate the time required to complete each investigative phase.

Comment 4:

The locations for background samples to be collected for each media must clearly indicated in a figure for each **SAP**.

Response:

Three locations have been selected **as** background locations for **NAS** Pensacola. These are near the municipal water supply wells at **NASP**, and were described in detail in the Site 1 Draft Final RI report.

Comment 5:

EPA continues to recommend the use of pure bentonite grout materials with the installation of **PVC** wells.

Response:

Because of the proximity to saline water, monitoring wells will be installed in accordance with Florida Administrative Code 40A-3, which requires a neat cement grout.

SPECIFIC COMMENTS

SITE 15 - PESTICIDE RINSATE DISPOSAL AREA

Comment 1:

This **SAP** should not be implemented until it is determined (e.g., through consultation with **PWC**) whether building 3586 is still being "used for the storage, **mixing** and disposal of pesticides." (p. 5).

Response:

Building **3586** is currently used for the storage, mixing, and disposal of pesticides.

Comment 2:

A complete list of chemicals disposed of at this facility must **also** be compiled prior to implementing this **SAP**.

Response:

A complete list of chemicals disposed of at this facility will be compiled during the contaminant source survey before the field investigation begins. Sample locations will be biased to any areas identified during the contaminant source survey **as** disposal areas.

SITE 17 - TRANSFORMER STORAGE YARD

Comment 1:

One of the newer immunoassay screening kits would probably provide much better qualitative and quantitative information than the proposed Dexsil C1 screening. **EPA** strongly recommends use of the former in selecting appropriate boring locations.

Response:

Agreed. The immunoassay screening kits **will** be **used**.

SITE 18 - PCB SPILL AREA

Comment 1:

This site should first be screened with one of the newer immunoassay screening kits. The results of this screening will enable the Navy to make more **informed** decisions regarding the selection of final sampling locations.

Response:

Agreed. The immunoassay screening kits **will** be used.

SITE 24 - DDT MIXING AREA

Comment 1:

Because the exact location of the site **is** unknown, **EPA** recommends that the Navy attempt to locate **and** utilize a soil screening technique for **DDT**. It **is** very possible that one or more of the companies which market immunoassay screening kits for PCB analysis also have kits for **DDT**.

Response:

Agreed. Soil samples will be collected and submitted for pesticide analysis using Method 8080. At locations where DDT is detected, soil samples **will** be collected and submitted for full TAL/TCL analysis using CLP protocol.

SITE 28 - TRANSFORMER ACCIDENT AREA

Comment 1:

See comment for Site 17.

Response:

Agreed. The immunoassay screening kits will be used.