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July 18, 1995

David Clowes
Florida Dept. of Environmental Protection
Federal Facilities Coordinator
Twin Towers Office Building
2600 Stone Road
Tallahassee, FL 32399-2400

RE: Responses to Florida Department of Environmental Protection (FDEP) Technical Review and Comments, Draft Final Sampling and Analysis Plans (SAPs) for Category VI Sites 15, 17, 18, 24, and 28; Pensacola Naval Air Station, Pensacola, FL; Contract #N62467-89-D-0318, CTO-0071

Dear Ms. Humphris:

EnSafe/Allen and Hoshall **is** pleased to submit responses to technical review and comments provided to the Navy by the Florida Department of Environmental Protection for the Draft Final SAPs for Category **VI** Sites 15, 17, 18, 24, and 28.

Should you have any questions or comments regarding these errata or the comment responses, please feel free to call me.

Sincerely,

EnSafe/Allen & Hoshall

Brian E. Caldwell

Brian E. Caldwell
Task Order Manager

Enclosure

cc: Bill Hill - SOUTHNAVFACENGCOM
Bill Gates - SOUTHNAVFACENGCOM
EnSafe/Allen & Hoshall File - Memphis
EnSafe/Allen & Hoshall File - Pensacola

DEPARTMENT OF ENVIRONMENTAL PROTECTION DRAFT FINAL SAMPLING AND ANALYSIS PLANS (SAPs) FOR CATEGORY 6 SITES (SITES 15, 17, 18, 24 AND 28) NAVAL AIR STATION PENSACOLA, FLORIDA

Section 4.0 (All Sites):

COMMENT:

1. The submission of a separate SAP for each site appears to be an unnecessary cost, because the bulk of information presented in each SAP is identical in all SAPs. The submission of one SAP for Category VI sites should be considered.

RESPONSE:

Due to the advanced stage of production, the Category 6 Final SAPs will be submitted as separate documents. The submittal of one SAP for Category 7 sites will be considered.

COMMENT:

2. Unless the proposed Phase I work (source identification and determination of nature of contamination) was not conducted by previous investigations, duplication of this work does not appear worthwhile or cost-effective use of diminishing funds.

RESPONSE:

Previous work was conducted on sites 15, 17, and 24 only. Investigative data included screening analyses and full-CLP sampling of permanent wells. This data, coupled with a preliminary contaminant source survey performed by E/A&H, was evaluated in the SAP development. Historically, however, the Navy has noted discrepancies between screening data and CLP data at sites where comparisons were made; therefore, some duplication is necessary to fully identify the source and nature of contamination at these sites.

COMMENT:

3. In order to determine if sufficient sampling **has** already been conducted, and if not, the best locations for subsequent sampling; the results from the previous investigations should be summarized, with figures showing sample locations.

RESPONSE:

A summary of previous investigations **is** provided in the SAPs. These data were used to develop the sampling approach for each site. Sample locations for the RI investigation were based on previous investigations as well as a preliminary contaminant source survey performed by E/A&H. Please see the response to comment **2.**

COMMENT:

4. If the Geraghty & Miller monitoring wells were properly installed and are functional, they **should** be resampled before finalizing the location of the proposed monitoring wells.

RESPONSE:

Data from the G&M wells sampled during previous investigations were utilized in developing the sampling approach for these sites. These wells will be resampled in conjunction with the installation and sampling of temporary wells, as indicated in Table **4-1** (Site **15** only), before the installation of permanent wells at the sites.

COMMENT:

5. Sample locations should be based not only on grain size/TOC, but **also** on proximity to sources of Contamination. For example, sediment should be sampled if possibly impacted by an area of contamination, even **if** the sediment is coarse grained.

RESPONSE:

Sediment samples will be collected in areas potentially impacted by contamination. With the exception of Sites 2, 40, and 42, grain size and TOC analysis are used to characterize the sediment, and not necessarily direct the sample location.

COMMENT:

6. The updated, April 5, 1995, Florida Soil Cleanup Goals should be utilized.

RESPONSE:

Agreed.

COMMENT:

7. The cost benefit of collecting additional media samples to develop site-specific leachability numbers is questionable, especially since DEP has already developed leachability numbers. The additional cost would be better spent in delineating contamination or for site remediation.

RESPONSE:

The Navy will continue to develop site-specific leachibility goals at sites were soil remediation is imminent (i.e. soil concentrations > PRGs). The Navy feels that because FDEPs values were theoretically derived, they may be too conservative. Site specific leachibility values will be developed in the anticipation that the values will be greater than FDEPs, resulting in consequent lower remediation costs.

COMMENT:

8. Though temporary wells are acceptable in delineating groundwater contamination, the cost savings between the proposed temporary wells ("ungrouted permanent wells") and permanent wells appears questionable; especially if wells need to be resampled during subsequent phases of assessment and/or remediation. However, the utilization of direct push temporary wells in the screening phase may decrease groundwater assessment costs. Note, all temporary wells should be properly abandoned as soon as installed and sampled.

RESPONSE:

Temporary wells will be installed by hand auger and direct push methods without the use of a sand filter pack or bentonite seal. These wells will be developed, purged, and sampled immediately and properly abandoned after sampling.

COMMENT:

9. The specific information in the site histories that would exclude the need to sample for hexavalent chromium should be provided.

RESPONSE:

None of the Category 6 sites has a history of site activities (metal plating, casting, etc.) where hexavalent chromium would be a potential contaminant of concern. A statement to this effect will be added to each SAP's site history section. These corrections will be submitted as errata for each of the SAPs. If results from the initial phase of investigation indicate the presence of chromium above the range of NAS background concentrations, the need for hexavalent chromium sampling in subsequent phases of work will be reevaluated.

Site 15 (Pesticide Rinsate Disposal Area):

COMMENT:

10. Figure 4-1: Unless analytical data *can* be provided from the Former Holding **Tank** Location (southeast corner of site), soil samples should be collected at this location.

RESPONSE:

Agreed. Five soil borings and associated samples will be completed in the Former Holding Tank Location and analyzed for FSA to identify any potential contamination in this **area.** Corrections to the SAP (text, tables, and figures) will be submitted as an erratum.

COMMENT:

11. Figure 4-1: If groundwater flow is to the north, the locations of the proposed temporary wells appear reasonable.

RESPONSE:

Agreed.

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