



# EnSafe / Allen & Hoshall

a joint venture for professional services

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NAS PENSACOLA  
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October 20, 1995

**Program Management Office**

Shelby Oaks Plaza  
5909 Shelby Oaks Dr.  
Suite 201  
Memphis, TN 38134  
Phone (901) 383-9115  
Fax (901) 383-1743

**EnSafe/Allen & Hoshall Branch Offices:**

**Charleston**  
935 Houston Northcutt Blvd.  
Suite 113  
Mt. Pleasant, SC 29464  
Phone (803) 884-0029  
Fax (803) 856-0107

**Cincinnati**  
400 TechCenter Dr  
Suite 301  
Milford, OH 45150  
Phone (513) 248-6449  
Fax (513) 248-8447

**Pensacola**  
2114 Airport Blvd.  
Suite 1150  
Pensacola, FL 32504  
Phone (904) 479-4595  
Fax (904) 479-9120

**Norfolk**  
303 Butler Farm Road  
Suite 113  
Hampton, VA 23666  
Phone (804) 766-9556  
Fax (804) 766-9558

**Raleigh**  
5540 Centerview Drive  
Suite 205  
Raleigh, NC 27606  
Phone (919) 851-1886  
Fax (919) 851-4043

**Nashville**  
311 MusPark Blvd.  
Suite 130  
Nashville, TN 37217  
Phone (615) 399-8800  
Fax (615) 399-7467

**Dallas**  
4545 Fuller Drive  
Suite 100  
Dallas, TX 75038  
Phone (214) 791-3222  
Fax (214) 791-0405

U.S. Environmental Protection Agency  
ATTN: Mr. Jay Bassett  
345 Courtland Street, NE  
Atlanta, GA 30365

**SUBJECT:** CTO No. 0036  
**Final RI/FS Work Plan** Sampling and Analysis Plan  
Site 41, NAS Pensacola

**REFERENCE:** Contract N62467-89-D-0318

**Dear Mr. Bassett:**

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit **three** copies of the **Final RI/FS Work Plan/Sampling and Analysis Plan** for Site 41 at the Naval Air Station in Pensacola, **Florida** and the responses to comments. If you should have any questions or **need** any additional information regarding the work plan, please do not hesitate to call me.

Sincerely,

EnSafe/Allen & Hoshall

Henry H. Beiro  
*Task Order Manager*

Enclosure

- cc:** Contracts File: CTO No. 0036  
Project File: NAS Pensacola  
SOUTHNAV: Ms. Kim Reavis/Code 0283K??  
Bill Hill, SOUTHNAVFACENGCOM - 2 copies  
EnSafe/Allen & Hoshall file - 1 copy  
EnSafe/Allen & Hoshall Pensacola - 1 copy  
Roy Joyner, NAS Pensacola - 9 copies  
Lynn Griffin, FDEP - 1 copy  
John Lindsay, NCMA - 1 copy  
John Mitchell, FDEP - 2 copies  
Tom Moody, FDEP - Cover letter only

DAVID CLOWES -- FDEP  
RESPONSE TO COMMENTS  
DRAFT FINAL RI/FS WORKPLAN, SITE 41  
NAVAL AIR STATION PENSACOLA  
COMMENTS DATED JUNE 27,1995

**COMMENT 1:**

Why was a second Draft **Final** Workplan submitted? The previous version of this document, dated November 30,1993 was also a Draft **Final**. the submission of previous versions of this document **and** the reason(s) for resubmission should be substantiated.

RESPONSE:

Because of the changes made in the **SAP** that were not consistent with the workplan, **it was** felt that the work plan should **also be revised to reflect those** changes.

**COMMENT 2:**

Most of the **information** provided in the **Workplan** and Sampling and Analysis Plan (**Draft**, submitted February 15,1995) **appears** to be redundant. In the future, it would appear to more cost effective combine **the Workplan and SAP** for each site/category, **and also remove the unnecessary duplication.**

RESPONSE:

The work plan was meant to address, in general **terms**, the purpose and the framework of the investigation. Detailed background **information on NAS Pensacola was also** provided. The **SAP** is meant to detail **sampling locations**, rationale, and address **the appropriate study endpoints of the investigation.**

**COMMENT 3**

Response to FDEP Comment:

Page 2-1: The **response** to my comment **contradicts the text and also the** December 1994 Tier I Partnering decision. The decision was that if the **wetlands were only impacted by a petroleum site**, then the **assessment/remediation would be addressed** under the petroleum agreement. **The** decision was not that these wetlands would **be excluded from consideration.** From the **data** presented in the subject document, the wetlands **appear to be affected by OU-10 ; thus should be included in Site 41.**

RESPONSE:

**All UST sites** that may have impacted **wetlands** will be addressed as part of the **Site 41** investigation. However, full scan **analysis will not need to be performed at these sites.**

**DAVID CLOWES — FDEP**  
**RESPONSE TO COMMENTS**  
**DRAFT FINAL RI/FS SAMPLING AND ANALYSIS PLAN, SITE 41**  
**NAVAL AIR STATION PENSACOLA**  
**COMMENTS DATED JUNE 27, 1995**

**COMMENT 1:**

Abstract: The abstract only mentions a total of 20 IR sites. however, based on the CSAP, there are 35 IR sites, excluding Sites 40 and 42.

**RESPONSE:**

Only 23 of the 35 IR sites are suspected of impacting the wetlands. These are the only sites that will be considered. This point will be made clearer in the text.

**COMMENT 2:**

Though Site 3 has been transferred to the petroleum program, the propose sample location for wetlands potentially contaminated by this site (Wetlands W1 and 72), should not change due to the change in programs. The only difference will be the constituents analyzed for do not have to be full scan, but limited to the constituents detected in the initial soil and groundwater assessment.

**RESPONSE:**

The constituents to be analyzed will not be full scan but will be limited to the constituents anticipated to be present or those detected in the initial soil and groundwater assessment. All other aspects of the investigation will be similar.

**COMMENT 3:**

Figure 2-1, Table 2-1, and Section 4.0: Category 6 sites besides Site 24 (15, 17, 18, and 28) should be illustrated and described as sites potentially impacting wetlands. For example, Site 15 (Pesticide rinsate Disposal Area), has the potential of contamination. All other IR sites, some with little potential of contamination, such as Sites 39 and 10; and others downgradient of any wetland, such as Sites 9 and 36, are illustrated. Though Category 6 sites are in their preliminary stages of assessment, as are Categories 3 and 7, a denotation should be included, stating further sampling could be included as more information is collected.

RESPONSE:

A description of **sites 15, 17, 18, and 28** will be included in Section 4.13, "**Other Sites of Concern**". Since little information is known about **these sites**, they **will be evaluated** for wetland impact **after** further study.

COMMENT 4:

Section 4.4.5: sediment and **surface** water samples may need to be collected from Wetlands 4A, 4B, and 4C as **further** assessment is conducted at **Category 6** sites.

RESPONSE:

It **will be** mentioned in the ~~text that~~ additional samples may need to be collected, depending on the **results from** Category 6. **Descriptions** of **Category 6 sites** is provided in **Section 4.14** of the **SAP**, "**Other Sites of Concern**". A general statement will **also be** added to **Section 4.14** stating that any other **sites, after further** investigation, suspected of impacting a wetland may **also be** studied further to gauge potential impacts.

COMMENT 5:

If reference samples are **already** collected by EPA from ~~Wetland~~ **39**, and the sediment contamination levels are below the **Sediment Screening Values**, why are **additional** reference samples proposed for ~~Wetlands~~ **25A, 25B, 32 and 33**?

RESPONSE:

There are a variety of wetland **types** at **NAS Pensacola**, which represent a **large** portion of the base. **To** obtain more representative **reference conditions**, ~~it was felt that~~ **choosing** **three** reference wetlands would yield more **accurate** and **representative** information on background conditions. **Wetland 27** has been **chosen over** **Wetland 25** as a reference wetland. These **three** wetlands differ in their **type, size**, and location to provide the best representation of **all** wetlands on base.