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NAS PENSACOLA
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October 30, 1995

U.S. Environmental Protection Agency
Attn: **Mr. Jay Bassett**
345 Courtland Street, N.E.
Atlanta, Georgia 30365

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

Dear Mr. Bassett:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit two copies of the **Final** Sampling and Analysis Plan for Site 36 — the IWTP Sewer Line at the Naval Air Station Pensacola in Pensacola, Florida. Responses to EPA and FDEP comments are also enclosed.

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: Bill Hill, SOUTHNAVFACENGCOM without enclosure
Ms. Kimberly Reavis, Code 0233KR without enclosure
EnSafe/Allen & Hoshall CTO file without enclosure
EnSafe/Allen & Hoshall file — 1 copy
EnSafe/Allen & Hoshall Pensacola — 1 copy
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Ron Joyner, NAS Pensacola — 9 copies
Melissa Waters, NOAA — 1 copy
Steve Cowan, BEI — 1 copy

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV
TECHNICAL REVIEW AND COMMENTS
DRAFT SAMPLING AND ANALYSIS PLAN (SAP): SITE 36
DRAFT TECHNICAL MEMORANDUM: SITE 36 — AVGAS LINE AREA
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

Draft Sampling and Analysis Plan:

Comment 1:

Page 9, Section 2.3.1:

The text and Figures 2-2 and 2-3 fail to clearly indicate the number and locations of soil, groundwater and sediment samples which were collected during that portion of the Site 36 investigation which was completed to facilitate BRAC construction activities. Please address the following apparent discrepancies as appropriate:

- A. According to the text, 37 soil borings were installed. Figure 2-2 illustrates 2 soil borings and Figure 2-3 illustrates 12 soil borings (total: 14 soil borings).
- B. According to the text, 22 temporary wells were installed. Figure 2-2 illustrates 24 temporary wells.
- C. Were any of the permanent wells illustrated in Figure 2-2 sampled? If so, the number and locations should be indicated in the text.
- D. Illustration of "Building 3380" sampling locations for all media in Figure 2-3 would facilitate evaluation of the relative locations of soil and groundwater sampling points.
- E. According to the text, sediment samples were collected from manholes. These locations should be illustrated in Figure 2-2. Also, it would be helpful to label all manhole numbers on some figure, since specific manhole numbers are referenced throughout the SAP text.
- F. According to the text and figures, the Site 36 investigation includes the area adjacent to Building 3380. The Executive Summary should be revised to state this fact, along with the decision made at the December 1994 Partnering meeting to upgrade appropriate portions of Site 36 (inclusive of Building 3380) to RI status upon completion of this screening investigation.

Response:

- A. The text has been revised to state that **22** of the soil borings were completed as temporary monitoring wells. Figure **2-2** has also been revised.
- B. The text has been revised to more clearly indicate the temporary monitoring well installed as part of the **BRAC** construction investigation and previously installed **ABB** temporary monitoring wells.
- C. All of the permanent monitoring wells illustrated on Figure **2-2** were sampled. The text will be revised accordingly.
- D. **All** Building **3380** sampling locations are shown on Figure **2-3**.
- E. Sampled manhole locations are shown on Figure **2-2**. All manholes are now labeled on Figure **2-2**.
- F. The executive **summary** has been revised to include the Building **3380** area in the Site **36** investigation. It **also** summarizes the Tier **1 Partnering Team** agreement to upgrade only appropriate sections of the IWTP sewer line to RI status. That decision will be made **upon** completion of the screening investigation.

Comment 2:

Pages 9 through **18**, Section **2.3.2**:

- A. The same contaminant classes (i.e. VOCs, SVOCs, metals) were detected in both soil and groundwater samples. As such, it would be extremely useful to illustrate the data in a manner which facilitates direct comparison (and hence, evaluation) of the results for these two media. One possible way of doing this would be to illustrate soil results for a given contaminant(s) on a clear plastic overlay, followed by groundwater results for the same contaminant(s) on the next (underlying page). Since **this** comment pertains to data presentation, it may be addressed during preparation of the draft report for Site 36, rather than through revision of **this SAP**.
- B. In December 1994, EPA commented **on the** Removal Action Plan submitted by the Navy for the soils adjacent to Building **3380** (see Attachment 1). Comment **7** of **this** review, regarding additional sampling **needs** must be addressed in **this SAP**. Comments **3** through **5**, regarding sampling activities and results, Contaminant Source Survey (**CSS**) results, and general information gathering results, must be addressed in the draft report which is prepared for Site 36. EPA is still awaiting receipt of a revised Removal Action Plan or Report which adequately addresses our comments.

Response:

- A. The data will be presented as requested in the draft report for Site 36.
- B. The identified soil near Building 3380 was removed and replaced with clean backfill. Soil samples were collected at the extent of the excavation to document that all soil above the PRGs was removed. That data will be summarized in the Site 36 report.

Comment 3:

Page 18, Section 2.3.3:

This subsection is very helpful. EPA recommends that this subsection become a standard subsection for all media in all reports, even if it states nothing more than that the detection limits for all analyses were at or below the required levels. Also, all data presentations should include a clear list of problematic analyses and detection limits in order to facilitate Tier 1 evaluation of, and concurrence on, all resampling plans.

Response:

As discussed in the Tier 1 Partnering Meeting, this subsection will be included when it is applicable. Generally, this information is not available during SAP preparation.

Comment 4:

Page 21, Section 2.4.2:

This section should be updated to reflect the current decisions made by Tier 1 regarding portions of Site 36 impacted by removal of the AVGAS line. Namely, that little or no soil will actually be removed during AVGAS line removal, and hence, what little soil is removed during this action may be replaced back in the hole. Furthermore, at a later date, the BRAC construction contractor shall remove all soils adjacent to the AVGAS line which contain contaminants in excess of the agreed-upon PRGs. The specifics of this removal action (such as the actual area of soil to be removed) should be presented in an appropriate document (e.g. Removal Plan, Action Memo) for Tier 1 concurrence. This latter document must also address the following concerns, which were not addressed in the present SAP:

- (i) contingency plans — if the first round of confirmatory samples shows contaminant levels in excess of the PRGs, how will removal plans be adjusted to ensure that the goal of removing all soil contamination in excess of the PRGs is achieved?

(ii) 36GR07 — soil excavation and confirmatory sampling must also be **performed** at this location, where benzo(a)pyrene was detected at a concentration significantly exceeding the agreed upon PRG (300 ppb vs. 88 ppb).

Response:

The section **has been** updated to include the Tier 1 decision not to remove **soil as** part of the AVGAS line removal. What little soil is removed during the **AVGAS line** removal **will** be returned to the excavation. An Action Memorandum for the Chevalier Field Removal Actions **was** submitted on July **12, 1995**. Sampling activities are documented in the memorandum.

Comment 5:

Page 22, Section 3.1:

The general approach presented for conducting the Contaminant Source Survey (CSS) is acceptable. One presumed use of the **CSS** is to evaluate the need for additional **data** collection efforts (**i.e.** beyond those currently presented in the **SAP**). **As** such, the results and conclusions of the **CSS** should be presented during a Tier 1 meeting for Tier 1 concurrence. This would preferably be done prior to field demobilization. Use of the **CSS** in developing the sampling strategy should be indicated in Section 4.3: Sampling Locations and Rationale.

Response:

The CSS **was** completed before submittal of **this SAP**. Information obtained during the **CSS** is contained within the appendices and presented in the Sample Location and Rationale section.

Comment 6:

Page 25, Paragraph 3:

Presumably, Phase II samples (if collected) will only be analyzed for parameters **exceeding** the PRGs, and **Phase III** confirmatory samples (if collected) will be analyzed for the full **TCWTAL**. If this is the case, then the Baseline **Risk** Assessment (BRA) cannot be "completed **during** Phase II", as indicated on page 3 of the **SAP**. Rather, the purpose of Phase III is to collect the high quality data needed to complete the BRA. Please revise the **SAP** text as needed for clarity and consistency.

Response:

The Phase **III** samples would be collected for confirmation of the Phase **II** Sampling only. The Phase I data are likely to be best suited for the **BRA**. The **BRA** may be done following Phase I or Phase III if necessary.

Comment 7:

Page 32, Paragraph 1:

- A. According to the text, portions of the "IWTP Line — Site 36" are above ~~the~~ water table. It was EPA's understanding that only that portion of the IWTP line ~~being~~ investigated as part of Site 30 (OU 2) is above the saturated zone. The general sampling rationale presented is sound. However, the draft report prepared for Site 36, must include current information regarding the relative depths of the **IWTP** line and the water table (e.g. specific locations and a water level map for the entire site).
- B. How will the soil borings advanced along these "unsaturated" portions of the line be used "to investigate any potential piping system leaks".

Response:

- A. The draft report will include the relative depths of the IWTP line and the water table.
- B. The sentence will be revised to state that the **soil** borings **will** be advanced along the unsaturated portions of the line to **assess** if there is **any** contaminated soil **near** the **line** at manhole locations or where PWC performed repairs on the IWTP sewer line.

Comment 8:

Page 32, Groundwater Samples:

It is unclear from the text exactly which wells will be sampled for the full **scan** analysis. Please see comment #1, **and** revise the text as appropriate.

Response:

Agreed.

Comment 9:

Appendix B, Page 3, Paragraph 3:

The heavily clogged, **dirty** condition of **the IWTP** line to **the** west and northwest of Building **2662** should be evaluated as a potential source for the groundwater contamination detected adjacent to Building **3380** and associated areas.

Response:

As discussed in the Tier 1 Partnering meeting, that section of the sewer line is below the water table. Therefore, groundwater infiltrating the line would occur. In addition, the IWTP sewer line closest to Building 2662 (between manholes A-10 and A-11-A) was observed to be in good condition.

TECHNICAL MEMORANDUM:

No comments. The document met its intended purpose of providing Tier 1 with current (at time of Issue) information about Site 36 needed to make decisions relevant to BRAC construction activities (e.g. **AVGAS** line removal). As indicated in comment #4 above, updated information and decisions on this portion of Site 36 must be provided in **the** appropriate forthcoming documents for Site 36 (e.g. **SAP**, removal documents, report).