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April 9, 1997

U.S. EPA
ATTN: Gena Townsend
345 Courtland Street, NE
Atlanta, GA 30365

RE: Sampling and Analysis Plan Addendum for Sites 30 and 38, NAS Pensacola
Contract #N62467-89-D-318/0059

Dear Ms. Townsend:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit one copy of the response to comments for the Sampling and Analysis Plan Addendum for Sites 30 and 38 at the Naval Air Station Pensacola. Since the document is now in final form, we are also providing our professional geologist seal. If you should have any questions or need any additional information regarding this document, please do not hesitate to call me.

Sincerely,

EnSafe/Allen & Hoshall

Henry H. Beiro, P.G.
Task Order Manager

Enclosure

- cc: Bill Hill, SOUTHNAVFACENGCOM - 2 copies
Ron Joyner, NAS Pensacola - 2 copies
John Mitchell, FDEP - 1 copy
Denise Klimas, NOAA - 1 copy
Judeth Walker, NAS Pensacola - 1 copy
EnSafe/Allen & Hoshall File - 1 copy
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Review of Draft Sampling and Analysis Plan Addendums for Sites 30 and 38
NAS Pensacola, Florida
Response to U.S. EPA Region 4

(Allison Drew Comments 09/03/93)

The Environmental Protection Agency (EPA) has completed its review of the Draft *Sampling* and Analysis Plan (*SAP*) Addendums for Sites 30 and 38 which were received in this office on July 28, 1993. Our enclosed comments must be satisfactorily addressed before EPA will consider the *SAP* Addendums for Sites 30 and 38, as well as the associated RUFFS Work Plans, for approval.

The *SAP* Addendums present the Navy's planned approach to investigating the portions of the Industrial Wastewater Treatment Plant (IWTP) Sewer Line which the Parties agreed to append to RI/FS Sites 30 and 38 during the Remedial Project Managers Meeting held February 3-4, 1993 in Atlanta. While the number of planned samples along the IWTP Sewer Line has been reduced, the investigative approach is still very similar to the approach proposed by the previous contractor. As stated at the February *RPM* meeting, EPA strongly believes that the installation of large numbers of borings and monitoring wells along an operating sewer line, with little or no knowledge of potential areas of leakage, is not an efficient or cost-effective means for identifying and delineating contamination at this site.

In separate correspondence dated June 16, 1993, Captain A.W. Johnson of NAS Pensacola describes the Navy's plans "to completely abandon the industrial waste sewer line by December 1998". The Navy plans to cap and abandon the IWTP line in four different sections, with the final section scheduled for abandonment by the 1998 completion date. The impending abandonment of the IWTP Sewer Line may account, in part, for the Navy's unwillingness, expressed later in this letter, to locate and secure the funding needed to perform additional sewer line testing. Existing test results were also not made available for inclusion in the subject *SAP* Addendums.

Some type of direct evidence indicating the current condition of the sewer line is needed in order to devise an effective sampling plan. A series of evenly-spaced borings will provide little information on the condition of the sewer line for points between these borings. Inferences to previously-collected data and water table levels are also not sufficient to justify a "No Further Investigation" decision for the IWTP Sewer Line. In EPA's original comments on the RUFFS Work Plan for the IWTP Sewer Line (dated August 13, 1992), we indicated a preference for excavation of the sewer line, since this would provide direct physical evidence of the condition of the sewer line and surrounding soils. Alternatively, testing results may be acceptable, since these would provide at least some information on which to base sampling locations. Such direct information must be collected in order for EPA to consider the RI Report for the IWTP Sewer

Line complete. EPA reminds the Navy that the current ROD completion date for RI/FS Sites **30 and 38** is **June 21, 1996**.

As further stated in the correspondence from Capt. A.W. Johnson, so long as the IWTP Sewer Line remains operational, it is the responsibility of both the Public Works Center (for purposes of O&M) and the IR Program (given its **status, as an RI and RFI site Number FL9 170 024 567**). However, once it is abandoned, the IWTP Sewer Line shall become solely the responsibility of the **IR Program (and fully subject to the aforementioned enforceable schedules)**. It may also become immediately subject to RCRA Treatment, Storage and Disposal (TSD) regulations. The Florida Department of Environmental Protection should be **consulted** on the status of the waste **materials** in the sewer **Line** upon abandonment. EPA strongly **encourages** the Navy to proactively consider the regulatory requirements of both programs. Plans to conduct **an** appropriate investigative program should be established and **initiated now** in order to ensure continued regulatory compliance as these new requirements become effective.

The current plans for abandonment of the **IWTP** Sewer Line are clearly in conflict with the enforceable IR Program schedules, and may also fail to meet RCRA TSD requirements. A timely decision **as** to how to proceed with the investigation of Sites 30 and 38 is **needed** in order to assure continued compliance for these sites. EPA recommends that the Parties schedule a meeting or conference call as soon as possible upon receipt of this letter in order to resolve these issues.

Technical Review and Comments
Sampling and Analysis Plan Addendums for Sites 30 and 38
Naval Air Station (NAS) Pensacola
Pensacola, Florida

COMMENT:

1. Collecting soil samples every 100 feet along the sewer line is not an effective method for detecting leaks. The Navy must wait until the video and smoke test results are available for review, and collect soil samples accordingly.

RESPONSE:

The Navy has closed the IWTP, therefore the sewer line is now abandoned. All connections to the line have been closed by concrete. The Partnering Team agreed to a closure procedure for cleaning and sampling the line. This plan was approved, executed and documented in the report entitled "Closure Report, Industrial Waste Treatment Plant, Sewer Lines" dated October 17, 1996.

COMMENT:

2. Placing fifteen monitoring wells along the portion of the sewer line which has been appended to Site 30, and five monitoring wells along the portion of the sewer line which has been appended to Site 38, will not provide effective monitoring. The Navy must wait until the video and smoke test results are available for review, and perform groundwater monitoring accordingly.

RESPONSE:

The Navy has closed the IWTP, therefore the sewer line is now abandoned. All connections to the line have been closed by concrete. The Partnering Team agreed to a closure procedure for cleaning and sampling the line. This plan was approved, executed and documented in the report entitled "Closure Report, Industrial Waste Treatment Plant, Sewer Lines" dated October 17, 1996.

COMMENT:

3. Monitoring of this unit cannot be completed until the sewer line is out of service.

RESPONSE:

The Navy **has** closed the IWTP, therefore the sewer line is now abandoned. All connections to the line have been closed by concrete. The Partnering Team agreed to a closure procedure for cleaning and sampling the line. This plan was approved, executed and documented in the report entitled "Closure Report, Industrial Waste Treatment Plant, Sewer Lines" **dated** October **17, 1996**.