



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
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9/23/2004

4WD-FFB

William J. Hill  
CodeES31  
South Division  
Naval Facilities Engineering Command  
2155 Eagle Dr.  
P.O. Box 190010  
North Charleston, South Carolina, 29419-9010

Subject: Sampling And Analysis Plan For Remedial Investigation At Site 43, NAS Pensacola, Florida

Dear Mr. Hill: We have reviewed the subject document and offer the following comments.

**GENERAL COMMENTS**

1. The above referenced sampling and analysis plan is regarded as a reasonably good document. The following specific comments are intended to improve the overall quality of the document.

**SPECIFIC COMMENTS**

- I. Cover Page (Page 1 of 181 of the electronic version). Please add an "S" to correctly spell "ANALYSIS" on the cover of this document.
- II. Section 2.2, Page 2-3, 3<sup>rd</sup> Paragraph (of the section), 2<sup>nd</sup> Sentence. This sentence says, "Test Pitting was completed at 17 of the geophysical anomaly areas." For the sake of completeness and clarity, please list which 17 of the 25 geophysical anomaly areas had test pits completed on them.
- III. Section 2.2, Page 2-3, 3<sup>rd</sup> Paragraph (of the section), 4<sup>th</sup> Sentence. This sentence

says, "Following the excavation seven subsurface soil samples were collected from depths ranging from 2 to 3.5 feet below land surface (bls) underneath the buried drum area." Please comment on whether this depth was, in fact, beneath the buried drums that were encountered. Please also comment on whether the test pits were excavated to a depth of 5 feet bls, as had been recommended in Section 2.1 of this report. Were the subsurface soil samples collected from such a relatively shallow depth bls in order to remain above the water table? Please comment.

- IV. Section 2.2, Page 2-3, 5<sup>th</sup> Paragraph (of the section), 1<sup>st</sup> Sentence. Please confirm that these five additional soil samples were collected from the "Soil Boring and Monitoring Well Locations" shown on Figure 2-2, and add text to this paragraph to make that perfectly clear.
- V. Section 3.2, Page 3-1, 1<sup>st</sup> Paragraph. The word "delineate" is misspelled three times in this paragraph and the word "anomaly" is misspelled once. Please spell them correctly. The 2<sup>nd</sup> sentence lists five anomaly areas, yet fails to include geophysical anomaly area 13, which on Page 2-6 was included as an area with exceedances that were not excavated. Please explain why anomaly area 13 was not included, and include it, if appropriate.
- VI. Section 3.2, Page 3-2, 3<sup>rd</sup> Paragraph (of the section), Bullet List. The 1<sup>st</sup> sentence of this paragraph says, "The specific metals to be analyzed for each anomaly area are as follows:" However, SVOCs are included in the lists. Please substitute the word "parameters" or "analytes" for "metals", or eliminate SVOCs from the lists. Also, vanadium is misspelled twice in this paragraph. Please spell it correctly. Also, Anomaly Area 23 ought to be given its own bullet in the bullet list. Please make it so.
- VII. Table 3-1. For the convenience of the reader, please add the acronyms "TCL" and "SVOCs" to the NOTES section of this table. Also, please remove "mL", "oz", and "HNO<sub>3</sub>" from the NOTES section of this table, as they are not included in this table. Also, in the "Preservation" column, please capitalize the word "cool" in the 1<sup>st</sup> row and remove the semicolon in the 2<sup>nd</sup> row.
- VIII. Section 3.2, Subsurface Soil Sampling Plan, Page 3-3, 1<sup>st</sup> Paragraph (of the subsection). The word "delineate" is misspelled once in the first sentence. Please spell it correctly. The 2<sup>nd</sup> sentence lists five anomaly areas, yet fails to include geophysical anomaly area 13, which on Page 2-6 was included as an area with exceedances that were not excavated. Please explain why anomaly area 13 was not included, and include it, if appropriate.
- IX. Section 3.2, Subsurface Soil Sampling Plan, Page 3-3, 2<sup>nd</sup> Paragraph (of the subsection). The 4<sup>th</sup> sentence of this paragraph mentions the 20 surface soil borings that were already discussed in the previous subsection. Please remove the reference to these surface soil borings from this subsection. Please add the word "subsurface" to the 5<sup>th</sup> sentence of this paragraph so that the sentence reads, "The proposed

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subsurface soil investigation area is shown on Figure 3-2.”

- X. Section 3.2, Subsurface Soil Sampling Plan, Page 3-3, 3<sup>rd</sup> Paragraph (of the subsection), 1<sup>st</sup> Sentence. The word “vanadium” is misspelled once in this sentence. Please spell it correctly.
- XI. Figure 3-2. The locations of the two proposed subsurface soil samples within the footprint of the former tennis court location that are not directly adjacent to Geophysical Anomaly 15 appear to be rather arbitrary. Please comment on the wisdom of performing a search for geophysical anomalies within the footprint of the former tennis court location now that the tennis court has been removed. Mind you, this comment assumes that the March 1994 geophysical survey did not include the footprint of the former tennis court location (owing to cultural clutter and its resulting interference in geophysical surveys), and that the tennis court was constructed sometime after drums were disposed of in this area.
- XII. Figure 3-3. Eight proposed shallow monitoring well and soil boring locations should be shown on this figure, not seven which are currently shown.
- XIII. Table 3-2. For the convenience of the reader, please add the acronyms “CLP”, “TCL”, “VOCs”, and “TAL” to the NOTES section of this table. Also, please make the word “degree” plural in the NOTES section of this table.
- XIV. Section 3.2; Aquifer Testing, Page 3-9, 1<sup>st</sup> Paragraph (of the subsection), 2<sup>nd</sup> Sentence. It is assumed that the acronym “UST” as used here stands for Underground Storage Tank, however, for the sake of clarity, please define the acronym here and/or include it in the list of acronyms at the beginning of the report.

Sincerely,

Gregory D. Fraley Digitally signed by Gregory D. Fraley  
DN: CN = Gregory D. Fraley, C = US  
Reason: I am the author of this  
document  
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Gregory D. Fraley  
Senior Remedial Project Manager

cc: Tracie Vaught, FDEP