N00204.AR.004255
NAS PENSACOLA
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT REMEDIAL ACTION WORK PLAN OPERABLE UNIT 18 (OU18) SITE 43 NAS PENSACOLA FL
9/11/2012
U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

September 11, 2012

Official Correspondence – This electronic message is being sent in lieu of regular mail

4SF/FFB

Ms. Patty M. Whittemore
Remedial Project Manager
SOUTHNAVFACENGCOM
NAS Jacksonville Building 103
Jacksonville, FL 32212

Re: EPA's review of the Draft RAWP for OU18, Site 43

Dear Ms, Whittemore:

The United States Environmental Protection Agency has received and reviewed the above referenced document. EPA has enclosed the comments that need to be addressed.

Please incorporate the changes into a draft-final document as prescribed in the FFA. If there are any issues with these comments, please contact me with any concerns at 404-562-8510 or woolheater.tim@epa.gov.

Sincerely,

Timothy R. Woolheater
Senior Remedial Project Manager
Federal Facilities Branch

CC: Mr. David Grabka, FDEP

TECHNICAL REVIEW OF THE
REMEDIAL ACTION WORK PLAN
OU 18, SITE 43, DEMOLITION DEBRIS DISPOSAL AREA
AUGUST 2012

NAVAL AIR STATION PENSACOLA
ESCAMBIA COUNTY, PENSACOLA, FLORIDA

I. GENERAL COMMENTS

1. The Remedial Action Work Plan Implementation of Remedial Design, Operable Unit 18, Site 43, Demolition Debris Disposal Area (the RAWP) does not address all of the components summarized on page 5-3 in Section 5.1.1 of the Environmental Protection Agency (EPA) document Interim Final Guidance on EPA Oversight of Remedial Designs and Remedial Actions Performed by Potentially Responsible Parties (the RD/RA Guidance), dated April 1990. The following items are deficient in the RAWP:

   a) The RAWP does not include a complete formulation of the Remedial Action Team, including the key personnel, descriptions of duties, and lines of authority in the management of construction activities. Specific examples are discussed in the Specific Comments below.
   b) There is no description contained in the RAWP of the process for continuously updating the project schedule as the Remedial Action (RA) progresses over time.
   c) The RAWP does not summarize the criteria for selection and the composition of the Independent Quality Assurance Team (i.e., the Project Quality Control [QC] Manager and the Unexploded Ordnance [UXO] QC Specialist [UXOQCS]).
   d) There is no section in the RAWP outlining the requirements for project close-out.

   Revise the RAWP to include all of the information that should be addressed in the document as stated on page 5-3 of Section 5.1.1 of the RD/RA Guidance.

2. Section 3.7, Pre-Excavation Sampling and Analysis, and Section 3.8.1, Contaminated Soil Excavation, indicate that confirmation samples will be sent to a laboratory for analysis of benzo(a)pyrene equivalents, arsenic, barium, copper, lead, and vanadium; however, Section 2.3.1 lists nine metals, including antimony, nickel, and zinc, that were detected at concentrations exceeding the residential soil cleanup target levels (SCTLs) at Site 43. The RAWP does not explain why confirmation samples will not be analyzed for all metals of concern (e.g., antimony, nickel, and zinc). Revise the RAWP to include antimony, nickel, and zinc or explain why these metals have been left out of the confirmation sampling.

3. The RAWP does not include many of the required elements of QA/R-5, EPA Requirements for Quality Assurance Project Plans (QAPPs), dated March 2001, or the Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual, dated March 2005 (UFP-QAPP Manual). For example, the RAWP does not specify measurement performance criteria that must be met by the laboratory or describe procedures that will be followed to audit, validate, and assess laboratory data. In addition, the RAWP does not identify the laboratory that will analyze samples collected

during this remedial action. The laboratory should be identified and laboratory-specific information such as standard operating procedures, quantitation limits, and quality control acceptance limits should be included in the RAWP to ensure that the methods and limits are adequate for meeting data quality objectives. Revise the RAWP to ensure that key requirements for QAPPs and laboratory-specific information are included or provide a reference as to where these can be located.

4. It is unclear what sample collection procedures and analyses will be performed on excavated soil to ensure proper disposal. Section 6.2.2 provides directions for labeling waste containers based on analytical results but no sampling procedures or analytes are described in Section 6.0. Section 4.3.1 discusses waste characterization sampling for wastes generated by Munitions and Explosives of Concern (MEC) disposal and decontamination activities but does not discuss procedures for excavated soil. Revise the RAWP to clarify the waste characterization sampling procedures and analyses for excavated soil disposal.

5. Table 4.2 indicates that composite sampling will be conducted for liquid waste but composite sampling is not described in the liquid waste sampling section of 4.3.1, Waste Characterization Sampling. Revise the RAWP to consistently describe the sampling procedure for liquid wastes.

6. Section 4.0 indicates that samples will be collected for "Pre/Post-MEC Detonation Site Impact Determination" but does not describe details of this activity (e.g., rationale and sampling procedures). Revise Section 4.0 to include additional details for Pre/Post-MEC Detonation Site Impact Determination.

II. SPECIFIC COMMENTS

1. Figure 2-2, Site 43 Site Map, Page 2-3

The text of the RAWP discusses site features and site information that are important for understanding the scope of work discussed in the RAWP but have not been displayed on Figure 2-2, Site 43 Site Map. These items include the twenty-five identified geophysical anomalies, the excavation boundaries for debris removal at Anomaly Areas 15 and 20, the location and extent of the six anomaly area excavations, the location of concrete projectile objects and Material Potentially Presenting an Explosive Hazard (MPPEH), the location of seventeen surface soil samples, the location of the five temporary monitoring wells, and relevant sampling results highlighting concentrations that exceed cleanup target levels. Revise Figure 2-2, Site 43 Site Map, to include the site features and information discussed in the text of the RAWP. If this will result in a cluttered figure, then consider including additional figures in the RAWP as appropriate to display the requested information.

2. Figure 3-1, Staked Silt Fence Detail, Page 3-2

Figure 3-1 shows a three inch minimum depth on the profile view of the staked silt fencing, but does not identify which feature of the fencing the three inch minimum applies to. If it refers to the height of the woven wire fabric fence above ground surface,

three inches is insufficient and conflicts with the frontal view of the fence that indicates a minimum distance of 2.5 feet from ground surface to the top of the fence. Revise Figure 3-1 to clarify which feature of the fencing requires a three inch minimum or to indicate a consistent minimum for both views.

3. Section 3.5, Analog Subsurface Anomaly Detection and Removal, Page 3-5

This section states that, **"**Non-UXO qualified personnel will not be allowed in the EZ during intrusive operations. If access is required by non-UXO qualified personnel, all work will stop while they are in the EZ." This requirement would, in effect, prohibit most authorized visitors from the regulatory agencies from entering the exclusion zone (EZ) to execute their oversight responsibilities if operations are underway. Access for authorized visitors, regardless of their UXO qualification status, is allowed by Section 14-7.5, Access, of Naval Sea Systems Command (NAVSEA) OP 5, Volume 1, Ammunition and Explosives Safety Ashore. Please revise the cited statement to allow for authorized visitors within the EZ during intrusive operations.

4. Section 3.8.1, Contaminated Soil Excavation, Page 3-9

According to Section 3.8.1, "the XRF screening will be used to guide the excavation limits vertically and horizontally to meet the cleanup goals for the site;" however, the XRF only provides data for metals concentrations and benzo(a)pyrene was also detected above SCTLs at Site 43. The text does not explain what tool(s) will be used to guide the excavation limits for meeting benzo(a)pyrene cleanup goals. Revise Section 3.8.1 to indicate what tool(s) will be used to guide the excavation limits for meeting benzo(a)pyrene cleanup goals at Site 43.

5. Section 3.8.1, Contaminated Soil Excavation, Page 3-9

Section 3.8.1 states "to avoid endangering old-growth trees adjacent to the excavation areas, excavations will be stopped when paved areas or the groundwater table are encountered and halted at a safe distance from the roots of existing trees.;" however, the text does not specify what qualifies as a safe distance or the criteria for establishing a safe distance. In addition, it should be noted that if delineation of soil is stopped at the edge of the pavement or near the roots of existing trees, then it can be assumed that contaminated soil exceeding screening levels will remain at the site. Any remaining contamination should be subject to Land Use Controls (LUCs) to protect future receptors. Revise Section 3.8.1 to specify what qualifies as a safe distance, to explain how the safe distance has been established, and to discuss LUCs for any remaining contamination.

6. Figure 3-4, Excavation Plan, Page 3-10

Figure 3-4 displays the extent of the tree canopy but does not indicate where tree trunks or tree roots are located, which are of greater interest since these features could impact the extent of the excavation areas. Revise Figure 3-4 to display the location of tree trunks and the extent of the roots rather than the tree canopy.

7. Section 3.8.1, Contaminated Soil Excavation, Page 3-11

According to Section 3.8.1, "excavated contaminated material may be direct loaded in tandem trailer trucks for transportation and disposal, or contaminated material may be stockpiled;" however, the text does not indicate how or when will it be decided which method to use. Revise Section 3.8.1 to specify how the method (i.e., direct loading or stockpiling) will be selected and when the decision will be made.

8. Figure 3-5, Proposed Groundwater Monitoring Well Locations, Page 3-12

Figure 3-5 does not show the direction of groundwater flow or groundwater concentrations from previous sampling events. These items are important for understanding why the proposed locations for new groundwater monitoring wells have been selected. In addition, it is not clear why there are no proposed monitoring well locations near the A6 and A7 excavation areas. Revise Figure 3-5 to show the direction of groundwater flow and groundwater concentrations from previous sampling events. In addition, revise Figure 3-5 to include proposed monitoring well locations near the A6 and A7 excavation areas, or explain why wells are thought to be unnecessary in these areas.

9. Table 3-1, Groundwater Monitoring Well Details, Page 3-13

Table 3-1 indicates that groundwater samples from the new monitoring wells will only be analyzed for lead, but soil at Site 43 contained benzo(a)pyrene and nine metals, including antimony, arsenic, barium, copper, nickel, vanadium, and zinc, above SCTLs. In order to confirm that contaminants in soil have not leached into the groundwater, samples collected from the new monitoring wells should be analyzed for the chemicals present in soil above SCTLs. Expand the analysis for groundwater samples collected from the new monitoring wells to include benzo(a)pyrene, antimony, arsenic, barium, copper, nickel, vanadium, and zinc.

10. Table 3-3, Project Personnel Directory, Page 3-15

Table 3-3 contains personnel entries that are "TBD" or to be determined. The personnel should be selected and updated in the RAWP prior to the commencement of Remedial Action (RA) activities at Site 43. Ensure all entries listed as "TBD" in the RAWP are updated prior to the beginning of RA activities at Site 43.

11. Section 4.3, Borrow Source Confirmation Sampling, Pages 4-5 through 4-6

The rationale for the number of samples proposed for this removal action is not sufficient. This section indicates that one representative sample will be analyzed from each stockpile or borrow source area and one sample each will be needed to characterize solid and liquid waste streams. In addition, the first step of the Procedure for Collecting Non-Volatile Samples states that soil or solid waste samples will be collected "from five randomly selected sample locations." It is unclear if one sample (for volatile analytes) or a 5-point composite sample (for non-volatile analytes) is sufficient to represent each stockpile or borrow source area. In addition, the procedure does not specify how the five locations will be randomly selected. Revise this section to include the maximum volume

of borrow material or waste that is represented by one sample or one 5-point composite sample and specify how the five locations for soil or solid waste sample collection will be randomly selected.

12. Figure 5-1, Project Organization Chart, Page 5-2

Figure 5-1 does not contain contact information for the staff members displayed in the Project Organization Chart. In addition, the Project Organization Chart contains personnel entries that are "TBD." Revise Figure 5-1 to include contact information for the staff members displayed in the Project Organization Chart. In addition, ensure all entries listed as "TBD" in the Project Organization Chart are updated prior to the beginning of RA activities at Site 43.

13. Figure 5-1, Project Organization Chart, Page 5-2 and Table 5-1, Roles, Responsibilities, and Authorities of Key Project Personnel, Page 5-3

Most of the roles listed in Table 5-1 are not included in the Project Organization Chart, so it is not clear how the roles listed in Table 5-1 report or relate to the positions shown on Figure 5-1. In addition, the responsibilities and authorities of the most of the positions shown on Figure 5-1 have not been summarized in Table 5-1. Expand Figure 5-1 to include the roles listed in Table 5-1. In addition, revise Table 5-1 to include the positions shown on Figure 5-1 and the associated responsibilities and authorities.

14. Figure 5-1, Project Organization Chart, Page 5-2; Table 5-1, Roles, Responsibilities, and Authorities of Key Project Personnel, Page 5-3; and Section 5.4.8, Waste Management, Page 5-15

The role of Waste Coordinator is discussed in Section 5.4.8, but has not been included either on Figure 5-1 or in Table 5-1, or different terms are used. Revise Figure 5-1 to include the role of Waste Coordinator and revise Table 5-1 to include the responsibilities and authorities associated with this role and ensure that this position is referred to consistently throughout the RAWP.

15. Section 5.4, Definable Features of Work, Pages 5-6 through 5-16

Several definable features of work listed in Section 5.4 (e.g., Pre-Mobilization Activities, Groundwater Monitoring Well Installation, and Site Restoration) are not described in the following subsections. Revise the RAWP to include subsections to describe each definable feature of work listed in Section 5.4, including Pre-Mobilization Activities, Groundwater Monitoring Well Installation, and Site Restoration.

16. Section 5.6.2, Continual Improvement, Page 5-18

Section 5.6.2 states that "project personnel at all levels are encouraged to provide recommendations for improvements in established work processes and techniques;" however, the text does not indicate whether the RAWP will be updated each time an improvement is approved or if the improvements will be described in the Remedial Action Completion Report (RACR) as changes/deviations from the RAWP. Revise

Section 5.6.2 to specify whether approved improvements will be documented via RAWP revisions or in the RACR as changes/deviations from the RAWP.

17. Section 6.2.2, Labels, Page 6-2

According to Section 6.2.2, "if analytical results indicate that the container contents are hazardous, the other container will be labeled with a pre-printed "Hazardous Waste" label;" however, it is not clear what is meant by the term "other container". Clarify what is meant by the term "other container" in Section 6.2.2.

18. Section 6.2.3, Waste Management Area Requirements, Page 6-5

According to the soil stockpiles procedures described in Section 6.2.3, "(a)ccumulated free liquids will be pumped to a container or tank. Rainwater only may be pumped to the ground surface." However, because rainwater may have mixed with accumulated free liquids or come into contact with contaminated soils, all accumulated free liquids including rainwater should be pumped to a container or tank for proper disposal. Revise Section 6.2.3 to state that rainwater will also be pumped to a container or tank.

19. Section 8.6, Protection of Endangered Species, Page 8-2

Section 8.6 does not identify endangered or threatened species that may be present in the area of Site 43. Endangered or threatened species in the vicinity of Site 43 should be identified in Section 8.6 along with any precautions specifically aimed toward the protection of those species, if necessary. Please revise Section 8.6 to identify endangered or threatened species that may be present in the vicinity of Site 43 and describe the precautions specifically aimed toward the protection of the identified species.

III. MINOR COMMENTS

1. Table of Contents, Pages II through IV

Some of the page numbers listed in the Table of Contents are not accurate. For example, the Table of Contents lists Figure 3-2 on page 3-2, but this figure is found on page 3-3. The Table of Contents indicates that Figure 3-4 is on page 3-6, but this figure is found on page 3-10. Update the RAWP Table of Contents to ensure accurate page numbers are provided for all sections, tables, and figures.

2. Figure 3-3, Temporary Containment of Excavated Soil Detail, Page 3-3

Greek characters are used for the plan view on Figure 3-3. Revise Figure 3-3 to use English letters in place of the Greek letters.

3. Section 3.8.1, Contaminated Soil Excavation, Page 3-11

The first paragraph on Page 3-11 references Section 8.0 for the Waste Management Plan of this Work Plan; however, the Waste Management Plan is presented in Section 6.0. Revise the text to reference the correct section.