

N00204.AR.004279
NAS PENSACOLA
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION IC REGARDING DRAFT SAMPLING
AND ANALYSIS PLAN SITE 43 OPERABLE UNIT 18 (OU18) NAS PENSACOLA FL
8/20/2012
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

August 20, 2012

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

4SF/FFB

Ms. Patty M. Whittemore
Remedial Project Manager
SOUTH NAV FAC ENG COM
NAS Jacksonville Building 103
Jacksonville, FL 32212

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

Dear Ms, Whittemore:

The United States Environmental Protection Agency has received and reviewed the above referenced document. Enclosed, EPA has provided the comments to the document along with a Checklist that EPA uses to review the UFP document.

Please incorporate the changes into a revised and 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

Enclosure

CC: Mr. David Grabka, FDEP

**DRAFT SAMPLING AND ANALYSIS PLAN FOR
REMEDIAL ACTION FOR
OPERABLE UNIT 18: SITE 43
DEMOLITION DEBRIS DISPOSAL AREA
AUGUST 2012**

**NAVAL AIR STATION PENSACOLA
ESCAMBIA COUNTY, PENSACOLA, FLORIDA
EPA ID NO. FL9170024567**

I. GENERAL COMMENTS

1. It is unclear if the proposed sample design is sufficient for addressing the questions of this investigation. The following issues have been identified that should be addressed:
 - a. The Draft Sampling and Analysis Plan for Remedial Action for Operable Unit 18: Site 43 Demolition Debris Disposal Area (Draft SAP) does not present previous sample results for soil and groundwater to support the proposed sampling locations. Tables and/or a figure should be included presenting previous results above action levels.
 - b. It is unclear how the vertical extent of contamination will be confirmed by the sampling approach. The Draft SAP proposes to establish vertical delineation by sampling the corners and sidewalls of each hot spot. However, ideally, the contaminant concentrations at the corners and sidewalls will be below action levels. It is possible that contamination in the center of the hot spot could be deeper than the corner and sidewalls indicate. Worksheet #14 does not discuss the steps that will be taken if the floor sample exceeds action limits (e.g., additional vertical step-outs will be performed).

Revise the Draft SAP to include results from previous investigations and describe the steps that will be taken if the floor sample(s) exceed the action limits.

2. The Draft SAP dated August 2012 does not include important laboratory-specific information, such as the Quality Assurance Manual, standard operating procedures (SOPs), quantitation limits or quality control (QC) limits. Without this information, the ability of the laboratory to meet the Measurement Performance Criteria and the overall adequacy of the methods cannot be evaluated. For example, it is unclear why SOP 00132 for the Toxicity Characteristic Leaching Procedure is listed on Worksheet #23 rather than an SOP for the Synthetic Precipitation Leaching Procedure that will be used for this investigation. Revise the Draft SAP to include additional laboratory information as indicated in the Uniform Federal Policy for quality Assurance Project Plans (UFPQAPP) Manual. Alternatively, revise the Draft SAP to provide a reference of where the laboratory-specific information/Quality Assurance Manual/SOPs/QC limits etc., can be located.
3. It is unclear why benzo(a)pyrene equivalents (BEQs) are not indicated for hot spot A6 in Table 1 presented in Worksheets #10 and #14. Worksheet #18 includes BEQs in surface soil samples for all hot spots. Revise the Draft SAP to resolve this discrepancy.

4. The first sentence on Page 35 indicates the Environmental Protection Agency (EPA) Maximum Contaminant Level (MCL) for lead is 15 micrograms per liter ($\mu\text{g/L}$). It should be noted that the 15 $\mu\text{g/L}$ lead (at tap) standard is not an MCL, but an “action level”. This same reference to a lead MCL of 15 $\mu\text{g/L}$ also occurs on SAP Worksheet #11 - Project Quality Objectives/Systematic Planning Process Statements, 2. What are PALs?, Page 39. Revise the Draft SAP to address this issue.
5. The Draft SAP does not present the Florida Department of Environmental Protection (FDEP) Leachability to Groundwater (LGW) Soil Cleanup Target Levels (SCTLs). For example, the SAP Worksheet No. 11, Project Quality Objective/Systematic Planning Process Statements, Page 39 discusses the Project Action Limits (PALs) for LGW for site COCs, however, PALs for LGW for the Site 43 COCs are not presented in this section. Additionally, in SAP Worksheet #14 – Summary of Project Tasks, Page 49, Table 1 does not list the PAL for LGW for the COCs listed for soil. Finally, Worksheet #15 - Reference Limits and Evaluation Table provides the PALs for the analytical data. However, LGW PALs for the site COCs are not listed in the worksheet table. Revise the Draft SAP to address this issue.
6. The Draft SAP does not discuss the collection of global positioning system (GPS) coordinates for sample locations. If a GPS unit will be used for this investigation, revise the Draft SAP to discuss this instrumentation in appropriate worksheets (e.g., #21 and #22).
7. The Draft SAP does not indicate that EPA will be notified of significant corrective actions or assessment findings. Revise the Draft SAP to indicate that EPA will be notified with this information.

II. SPECIFIC COMMENTS

1. SAP Worksheet No. 10 – Problem Definition, Regulatory History, Page 33

The third paragraph in this section states that the Final Remedial Investigation (RI) Report documented the collection of surface soil, subsurface soil, and groundwater samples to determine the nature and extent of contamination at Site 43. However, the text does not discuss whether sediment and/or surface water was investigated during the Site 43 RI. As such, it is not clear whether potential sediment and/or surface water (if present) issues at Site 43 have been adequately addressed. Additional text is needed to indicate how it was determined that there are no sediment and/or surface water exposure issues at Site 43. Revise the Draft SAP dated August 2012 to address this issue.

2. SAP Worksheet No. 10 – Problem Definition, Physical Setting and Land Use, Page 34

This section does not describe the surface water features surrounding the Naval Air Station (NAS) Pensacola and Site 43. Additionally, this section does not describe the surface water flow direction and storm water drainage pathways and discharge points at

Site 43. For completeness and to promote a clearer understanding of the physical site conditions, revise the Draft SAP to address this issue.

3. SAP Worksheet No. 10 – Problem Definition, Geology and Hydrogeology, Page 34

The last paragraph in the section indicates the groundwater flow direction is towards the east. However, a potentiometric surface map has not been presented for Site 43. In order to ensure that monitoring well network is adequate to monitor the Site 43 plume conditions, a potentiometric map will be required. Revise the Draft SAP to address this issue.

4. SAP Worksheet No. 10 – Problem Definition, Groundwater Long-Term Monitoring, Page 36

This section indicates that groundwater monitoring will be conducted in five (5) wells listed in Table 2, Groundwater COCs for LTM, and shown in Figure 3, Remedial Action Components. However, the title of the column over the monitoring wells listed in Table 2 indicates “Proposed Area of Excavation” instead of Proposed Monitoring Well Locations. Additionally, a review of Figure 3 indicates that only four (4) wells are shown in the figure and well PEN-43-5S could not be located. Revise the column header in Table 2 as appropriate and ensure all monitoring wells proposed to be sampled have been identified in Figure 3.

5. SAP Worksheet No. 10 – Problem Definition, Environmental Questions to be Answered for OU-18, Site 43, Page 37

The first question designated “1a.” in this sections asks “what is the horizontal and vertical extent of COCs in soil above FDEP direct exposure industrial SCTLs and FDEP leachability to groundwater (LGW) SCTLs at the proposed areas of excavation?” The Draft SAP Table 1, Soil COCs in Proposed Areas of Excavation, Page 36 lists the FDEP direct exposure residential and industrial SCTLs but The FDEP LGW SCTLs were not presented. As such, it is not known how conservative the FDEP LGW SCTLs for site COCs are relative to the FDEP residential and industrial SCTLs. Revise the Draft SAP to address this issue.

6. SAP Worksheet No. 10 – Problem Definition, Environmental Questions to be Answered for OU-18, Site 43, Page 38

The text under the third question on Page 38 indicates the LTM objectives are to determine if the contaminants and/or contaminant plumes are stable, increasing, or decreasing after source area removals in soil are complete. However, the text does not explain how this objective will be met. The Draft SAP should be revised to indicate how it will be demonstrated that the plume is stable, increasing or decreasing (e.g., time-series plots, statistical analysis [e.g., Mann Kendall], or plume maps through time will be prepared based on measured concentrations).

7. **SAP Worksheet No. 10 – Problem Definition, Environmental Questions to be Answered for OU-18, Site 43, Page 38**

The text under Environmental Question 4 indicates installation of three new monitoring wells upgradient and downgradient of well PEN-MW-13S, which is a source area well with lead exceedances. Figure 3 depicts the proposed well PEN-43-MW-102S location to be installed presumably (no potentiometric maps prepared) upgradient of source area well PEN-MW-13S. A review of figure 3 shows proposed well PEN-43-MW-102S to be installed within the footprint of the A4 Excavation Area. The Draft SAP does not discuss step-out procedures for monitoring well installations at Site 43. If the groundwater data collected from PEN-43-MW-102S at the location depicted in Figure 3 exceed applicable screening levels, additional monitoring well installations will be required to define the plume. Additionally, this would also apply to newly installed downgradient wells with exceedances of screening levels. Revise the Draft SAP to address this issue to ensure that the site has an adequate monitoring well network.

8. **SAP Worksheet No. 11, Project Quality Objective/Systematic Planning Process Statements, Page 43**

Project Quality Objective (PQO) No. 6 indicates if the horizontal delineation of excavation encounters paved areas, the delineation will be stopped and excavation limits will be established at the edge of the paved areas. It should be noted that if delineation of soil is stopped at the edge of the pavement, then it can be assumed that contaminated soil exceeding screening levels is present beneath the paved area. Since the pavement is essentially serving as the remedy for protection from impacted soils, the paved area will be subject to Land Use Controls (LUCs) to maintain the integrity of the paved area. Revise the Draft SAP to address this issue.

9. **SAP Worksheet No. 31, Planned Project Assessments, Page 95**

This worksheet references the Department of Defense (DoD) Environmental Laboratory Accreditation Program (ELAP) certification, which is included in Appendix C. This certification does not list the methods for which the laboratory is certified. Revise the Draft SAP to include a list of methods for which the laboratory is certified by DoD ELAP.