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LETTER AND TECHNICAL REVIEW OF RESPONSE TO U S EPA COMMENTS ON DRAFT
SAMPLING AND ANALYSIS PLAN FOR GROUNDWATER/SUFRACE WATER INTERFACE
OPERABLE UNIT 2 (OU2) SITES 11 AND 30 NAS PENSACOLA FL

5/15/2013

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

May 15, 2013

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

4SF/FFB

Ms. **Patty Marajh-Whittemore**, Remedial Project Manager,
ITP Gulf Coast
Dept of the Navy; Naval Facilities Southeast
Attn: AJAX Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

Re: OU 2 GSI SAP RTC review

Dear Ms Whittemore:

The U.S. Environmental Protection Agency has received and reviewed the above mentioned responses to comments and has enclosed the remaining issues for the document. Please address the comments in a separate correspondence and, once agreed upon, integrate the agreements into a revised document.

Thank you for the opportunity to review this document. Should any further clarification be required, please contact me at 404-562-8510 or woolheater.tim@epa.gov.

Sincerely,

Timothy R. Woolheater
Senior Remedial Project Manager
Federal Facilities Branch

CC: David Grabka, FDEP

TECHNICAL REVIEW OF THE RESPONSE TO EPA COMMENTS ON THE

**DRAFT SAMPLING AND ANALYSIS PLAN
GROUNDWATER/SURFACE WATER INTERFACE,
OPERABLE UNIT (OU) 2, SITES 11 AND 30,
JULY 2010
AND THE REVISED VERION DATED
FEBRUARY 2013**

**NAVAL AIR STATION PENSACOLA
ESCAMBIA COUNTY, PENSACOLA, FLORIDA**

An evaluation of the responses to comments and determination of adequate integration of responses into the *Draft Sampling and Analysis Plan for Groundwater/Surface Water Interface, Operable Unit (OU) 2, Sites 11 and 30*, dated February 2013 (SAP) was conducted. The comment responses and integration evaluations presented below identify only the general and specific comments that require additional response. Additional, new general and specific comments presented below were generated as result of the review of the February 2013 revision.

I. EVALUATION OF RESPONSE TO GENERAL COMMENTS

1. Evaluation of Response to General Comment 3:

The response partially addresses the comment. The response indicates that additional text has been added to the executive summary and Section 10.1 of the SAP; however, the last three paragraphs of the response have not been incorporated into the document. Revise the SAP to ensure this information is inserted into Section 10.1.

2. Evaluation of Response to General Comment 4:

The response partially addresses the comment. The response does not indicate how unacceptable exposure to ecological receptors will be addressed in the event that the groundwater surface water interface (GSI) data indicates that groundwater contamination is exerting adverse effects on the pore water and surface water. Revise the SAP to indicate what steps will be taken to address unacceptable exposure to ecological receptors if the GSI data concludes that groundwater contamination is negatively impacting pore water and surface water.

3. Evaluation of Response to General Comment 8:

The response partially addresses the comment. The rationale for the number and location of proposed samples is insufficiently detailed. For example, it is unclear why the number of samples is adequate to answer the study questions. Additionally, it is unclear why the pore water samples are located in close proximity to one another, rather than spaced evenly throughout the wetland. It also appears that the direct push technology (DPT) samples would be more likely to capture groundwater contamination from Site 30 if they were located further north in Wetland 5A since the potentiometric information presented in Figures 10-2 and 10-3 suggest that groundwater is primarily flowing towards the east. Revise the SAP to provide a more detailed rationale for each sample location and to clarify why the number of samples proposed will be sufficient to answer the study questions.

4. Evaluation of Response to General Comment 11:

The response partially addresses the comment. The response indicates that background samples for pore water will be obtained during Phase II of the GSI. However, this is not discussed in the SAP. Revise the SAP to discuss the collection of background samples for pore water, or indicate this information will be provided in a SAP Addendum.

5. Evaluation of Response to General Comment 12:

The response addresses the comment. However, the following text of the response should be added to the decision criteria in the SAP: “If the Project Team deems it necessary to collect pore water or surface water samples, the potential for ecological receptors and exposure pathways may need to be addressed in a SAP Addendum, even though the ROD concluded that there was no quality ecological habitat available at most of OU 2.” Ecological receptors have been identified in Wetland 6 and it has been added to the OU16 study. Revise the SAP accordingly.

I. ADDITIONAL GENERAL COMMENT

1. The text in Section 14.8 indicates that 10 pore water samples will be collected from Wetland 64. However, only five pore water samples are proposed within Wetland 64 on Figure 17-1. Additionally, the figure references in Section 14.8 are inaccurate. Revise the SAP to add the additional 5 pore water locations to Figure 17-1 and ensure the figure references in Section 14.8 are accurate.
2. The purpose of the GSI investigation is vague. It states that the purpose is to determine whether groundwater is affecting surface water. The reasons for determining the affect on surface water are not given. The purpose of ensuring that the pore water is not contaminated can also be expanded. Adverse chemical concentrations in the pore water may affect sediments, as well. The contamination of pore water, surface water and/or sediments need to then be related to ecological receptors in addition to human receptors.

III. EVALUATION OF RESPONSE TO SPECIFIC COMMENTS

1. Evaluation of Response to Specific Comment 6:

The response partially addresses the comment. The response provides a summary of contaminants exceeding Florida Department of Environmental Protection (FDEP) Groundwater Cleanup Target Levels (GCTLs) at each site within OU2; however, Figure 10-1 has not been updated to show where these contaminants were detected and at what concentrations. Further, it remains unclear why Sites 11 and 30 are considered to be representative of groundwater contamination at OU2, particularly since many contaminants were also detected above regulatory criteria at the other sites. It should be noted this relates back to the rationale for sample locations discussed in General Comment 8. Revise the SAP to update Figure 10-1 with the exceedances identified within the response for each site at OU2 and provide further justification indicating why Sites 11 and 30 are representative of groundwater contamination at OU2, or consider all sites within OU2 for this investigation.

2. Evaluation of Response to Specific Comment 13:

The response partially addresses the comment. Similar to the response to General Comment 4, the response does not discuss what will happen to the Conceptual Site Model (CSM) if this investigation demonstrates that groundwater adversely impacts pore water and surface water. Revise the SAP to clarify if the CSM will be updated in the event that groundwater contamination is found to adversely impact pore water and surface water.

3. Evaluation of Response to Specific Comment 18:

The response partially addresses the comment. The response indicates that tidal influence at Wetland 7 will be taken into consideration. However, it is unclear what steps will be taken to account for tidal influence at Wetland 7. Revise the SAP to clarify how tidal influence of contaminant movement at Wetland 7 will be evaluated.

4. Evaluation of Response to Specific Comment 25:

The response does not address the comment. The relevant equations for precision, accuracy, representativeness, comparability, and completeness (PARCC) parameters should be included in the SAP per Section 5.2.3, Usability Assessment, of *the Uniform Federal Policy for Quality Assurance Project Plans Manual* (UFP QAPP Manual), dated March 2005. Additionally, ensure the SAP provides calculations for field and laboratory completeness and corresponding completeness goals. Revise the SAP to provide the relevant equations for PARCC parameters per the UFP QAPP Manual.

II. ADDITIONAL SPECIFIC COMMENTS

1. Section 10.3, Evaluation of SPAWAR Report, Page 37

EPA evaluated the SPAWAR report and developed a number of conclusions that resulted in the Navy agreeing to put Wetland 64 into the GSI study. Please add reference to these discussions into the paragraph.

2. Section 14.5, DPT Groundwater Sampling, Page 62

This section indicates that polyethylene tubing will be utilized for groundwater collection. However, Teflon™ tubing should be used for groundwater collection, particularly for volatile organic compound (VOC) samples. Revise the SAP to indicate that Teflon™ tubing will be used during groundwater collection.

3. SAP Worksheet #19, Sampling and Analytical SOP Requirements Table, Page 84 and Appendices

The note at the bottom of the table on page 84 indicates laboratory standard operating procedures (SOPs) will be provided upon request. Please note as well that a CLP laboratory and typical CLP methods will be used. If there are non-standard SOPs, then these should be included in this worksheet (or as an appendix), noting what is standard and the deviations from it that will be used and the rationale for such deviations. EPA has decided that though

UFP guidance recommends the provision of SOPs in the SAP, these documents are large and encumber finding important information. This would be true of sampling protocols, as well. Please appropriately refer the reader to online locations for SOPs, if available (Region 4 Sampling SOPs), and document deviations in the document and the Appendix. If the SOPs are not available online, please reference where they can be found, if necessary.

4. Figures 10-1 and 17-2, Figure Appendix

These two figures appear to bring into question the groundwater well installation and pore water sampling locations associated with the well. Sampling results are not provided for well 30GS123 (though there are colored indicators of certain analyses) on Figure 10-1. There are results for 30GS111 above criteria; however, this well is located on the far side of the conveyance ditch from Site 30. Figure 17-2 would appear to be placing the new well in the general vicinity of 30GS123 and yet it would appear from Figure 10-1 that 30GS111 is where the contaminants would appear to be located. Please explain and clarify the work plan.