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LETTER REGARDING U S EPA REGION IV EVALUATION OF U S NAVY RESPONSE TO
COMMENTS ON THE DRAFT SAMPLING AND ANALYSIS PLAN FOR OPERABLE UNIT 2
(OU 2) SITE 11 AND SITE 30 GROUNDWATER TO SURFACE WATER INVESTIGATION NAS
PENSACOLA FL
3/20/2014
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

March 20, 2014

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: Operable Unit 2 Groundwater Surface Water Investigation SAP

Dear Ms Whittemore:

The U.S. Environmental Protection Agency has received and reviewed the above mentioned document and has enclosed comments on the document. Please address the comments in a separate correspondence and, once agreed upon, integrate the agreements into change pages for a final 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
DRAFT SAMPLING AND ANALYSIS PLAN
GROUNDWATER/SURFACE WATER INTERFACE
OPERABLE UNIT (OU) 2, SITES 11 AND 30
REVISION 5
DATED DECEMBER 17, 2013**

**NAVAL AIR STATION PENSACOLA
ESCAMBIA COUNTY, PENSACOLA, FLORIDA
EPA I.D. FL9170024567**

The following is an evaluation of the Response to USEPA Comments on the Draft Sampling and Analysis Plan Groundwater/Surface Water Interface, Operable Unit (OU) 2, Sites 11 and 30, dated July 2010, as presented in Appendix B of the Draft Sampling and Analysis Plan Groundwater/Surface Water Interface, Operable Unit (OU) 2, Sites 11 and 30 Revision 5, dated December 17, 2013 (Draft OU2 SAP Rev. 5), for the Naval Air Station, Pensacola, Florida (NASP). In addition to an evaluation of the responses, the Draft OU2 SAP Rev. 5 was reviewed to ensure that responses were appropriately incorporated.

It is noted that one new comment was generated during the review and evaluations are provided for those comments that were not adequately addressed by the second facility response (response to Additional General Comment 2). Those responses not addressed herein were adequately addressed by the second facility response, and the associated information was appropriately incorporated into the Draft OU2 SAP Rev. 5.

I. NEW COMMENT

1. One purpose for the data being collected is to ensure that the contaminants of concern do not affect the surface water. The contaminants of concern would appear to have been developed using protective criteria for groundwater. There may be a subset of contaminants that may have not been a concern for groundwater and yet would be a concern for surface water. Please clarify whether the original data was screened against the surface water criteria being used in this SAP.

II. ADDITIONAL GENERAL COMMENT

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.

Response: The following text in quotes has been added to the executive summary and Section 10.1.

“The purpose of the GSI study is to is to optimize the area requiring LUCs for groundwater based on the current plume extent and assess whether surface water is, or may be exposed to contaminated groundwater from Sites 11 or 30 (based on monitoring well data, groundwater flow rate and direction, or fate and transport modeling) at levels that exceed applicable surface water standards in the wetlands hydraulically downgradient of these two sites. If groundwater is not adversely affecting surface water and will not adversely affect the surface water in the future based on actual data or groundwater modeling, then alternative groundwater cleanup target levels (GCTLs) may be established in accordance with Chapter 62-780, Florida Administrative Code (F.A.C.). If the GSI investigation determines that groundwater from Sites 11 and 30 adversely affect surface water, the Project Team will convene to determine a path forward.”

It should also be noted that sediment and surface water samples are also being collected at Wetlands 5A, 7, 8 and 64 per the Draft Sampling and Analysis Plan for OU16, Site 41 (Resolution Consultants, 2013) to assess exposure by human and appropriate ecological receptors.

Evaluation: The response partially addresses the comment. While the facility responses adequately addresses the issues raised in EPA’s original comment, the last paragraph of the response was not incorporated into the Draft OU2 SAP Rev. 5. This information should be incorporated as it establishes the connection between potential contamination sourced to Sites 11 and 30, and impacts to ecological and human receptors. Revise the Draft OU2 SAP Rev. 5 to include the information provided in the last paragraph of the facility response.