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Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Attention: Mr. Bill Hill
2155 Eagle Drive, P.O. Box 190010
North Charleston, SC 29419-9010

SUBJECT: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
**DO 0071 SUBMITTAL OF REVISION 0 OF THE WORK PLAN,
SAFETY AND HEALTH ADDENDUM, QUALITY CONTROL PLAN
ADDENDUM AND ACTION MEMORANDUM FOR VARIOUS SITES,
NAVAL AIR STATION PENSACOLA, FLORIDA**
Site/Subject Codes: 407/5320

Dear Mr. Hill:

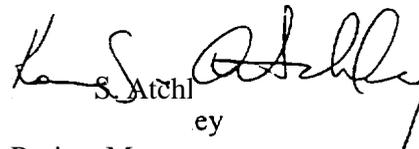
Enclosed is a copy of the above-mentioned document for the Navy Contracting Officer's signature and EPA and FDEP concurrence. A copy of the FDEP comment resolution has been enclosed to assist in your review. As you are aware, no comments were received from the EPA, NAS Pensacola, nor the public.

A copy of the Safety and Health addendum has previously been sent to Connie Merting electronically, thus any comments Ms. Merting had have been incorporated. Signature pages are being submitted for both the Safety and Health and Quality Control Plans for the Navy Contracting Officer's signature.

Distribution of the documents to other individuals listed with the original Delivery Order Statement of Work will take place following the receipt of the signed signature pages.

If you should have any questions, please feel free to call me at (423) 220-2167.

Sincerely,



K. S. Atchley
ey

Project Manager

KSA:cw:LRI497

Enclosure: As stated

cc: Gena Townsend, EPA
John Mitchell, FDEP



Bechtel Environmental, Inc.

Response to FDEP comments on Work Plan for Time-Critical Removal Action for Various Sites; NAS Pensacola, Florida

1. Page 2, Action Memo, specifies the PRG for lead as 500 mg/kg while Table 1-1, Work Plan, specifies 400 mg/kg. The residential **SCG** for lead is 500 mg/kg (June 26, 1996). Is the project specific PRG 500 or 400 mg/kg?

Response: The action memo was correct with a PRG of 500 mg/kg. The Work Plan will be changed.

2. The narrative on page 3 of the Work Plan describes Site 1 as being 10 feet by 30 feet in extent, while Table 1-1 on page 6 specifies it as 10 feet by 3 feet. Please resolve.

Response: After the area was surveyed, 10feet by 70feet wasfound to be the correct dimensionsfor the removal area at Site 1. The table and text will be corrected to reflect this change.

3. The narrative on page 3 of the Work Plan describes Site 9A as being 100 feet by 150 feet in extent, while Table 1-1 on page 6 specifies it as 100 feet by 15 feet. Please resolve.

Response: 100feet by 150feet are the correct dimensionsfor the questionable area at Site 9A. Afterfurther delineation efforts in December, the table and text will be corrected to define the approximate excavation area.

4. The Department encourages use of innovative site characterization technologies when effective and practical. Will the project specific x-ray fluorescence laboratory be able to obtain detection limits practical enough to achieve the site screening goals at site 9A?

Response: Yes, the x-rayfluorescence laboratory was used at another location, Loring Air Force Base, Maine, for this samepurpose, to better differentiate hazardous areasfrom non-hazardous areas. It is only used as afield screening method. At the time of remediation and disposal, confirmation samples will be collected to verify the achievement of 500 mg/kg.

5. The judgmental confirmatory sampling scheme posed for sites 10, 17, 18, and 25 seems sufficient considering the sites' limited extent. Site 9A, however, should have more than 5 confirmatory samples due to its larger extent.

Response: Confirmatory samples will be collected at intervals no greater than 50 feet around the perimeter of the excavation.

6. The estimated cost of \$423,000 to excavate and haul 200 tons of contaminated soil with confirmatory sampling seems excessive when compared to similar interim actions at other DoD facilities in Florida. I suggest the Team scrutinize the sources of the costs of these removal actions and economize to the extent practicable. Competitive lump sum bidding may help reduce costs by encouraging competitive pricing.

Response: The subcontract for hazardous waste transport and disposal was competitively bid. This cost is based on removal, transport and disposal of hazardous contaminated soil; labeled hazardous as a result of a soil sample which failed TCLP analysis for lead.