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LETTER REGARDING U S NAVY RESPONSES TO REGULATORY COMMENTS ON DRAFT
SAMPLING AND ANALYSIS PLAN AND HEALTH AND SAFETY PLAN FOR REMEDIAL
INVESTIGATION AT SITE 43 NAS PENSACOLA FL
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TtNUS/TAL-05-004/4821-3.2

January 19, 2005

Project Number 4821

Commander
Department of the Navy
Southern Division
Naval Facilities Engineering Command
ATTN: Mr. Bill Hill (ES31)
2155 Eagle Drive
North Charleston, South Carolina 29419-9010

Reference: Clean Contract No. N62467-94-D0888
Contract Task Order No. 0355

Subject: Response to Regulatory Comments on the Draft Sampling and Analysis Plan and Final Health and Safety Plan for the Remedial Investigation at Site 43, Naval Air Station Pensacola, Pensacola, Florida

Dear Mr. Hill:

Tetra Tech NUS is pleased to submit the attached Response to Comments document for Regulatory comments received on the Draft Sampling and Analysis Plan and Final Health and Safety Plan for the Remedial Investigation at Site 43, Naval Air Station (NAS) Pensacola, Pensacola, Florida. The Response to Comments addresses all comments received and explains and documents the changes to the text to be incorporated into the final version of the Sampling and Analysis Plan.

In order to continue with the projected schedule, TtNUS plans to publish the final version of this document, prior to approval of the Response to Comments. We will also proceed with the planning and initiation of the proposed sampling program. Any significant, future additional concerns or comments will be incorporated, as they become known, during the actual sampling program. A copy of this Response to Comments Document will be included as an Appendix to the Sampling and Analysis Plan.

If you have any questions regarding the attachment or require further information, please contact me at (850) 385-9899.

Sincerely,

A handwritten signature in cursive script that reads "Gerald Walker".

Gerald Walker, P.G.
Task Order Manager

GW/gw

Attachment

cc: Greg Fraley, USEPA
Tracie Vaught, FDEP
Allison Harris, Ensaf
Greg Wilfley, CCI
Debra Humbert, TtNUS (cover letter only)
Mark Perry/project file, TtNUS
Brian Caldwell, TtNUS

RESPONSE TO COMMENTS
FROM UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ON
SAMPLING AND ANALYSIS PLAN FOR REMEDIAL INVESTIGATION AT
SITE 43, NAS PENSACOLA, PENSACOLA, FLORIDA

GENERAL COMMENTS

COMMENT 1: The above referenced Sampling and Analysis Plan is regarded as a reasonably good document. The following specific comments are intended to improve the overall quality of the document.

SPECIFIC COMMENTS

COMMENT I: Cover Page (Page 1 of 181 of the electronic version).
Please add an "S" to correctly spell "ANALYSIS" on the cover of this document.

RESPONSE:
Corrections were made to the text.

COMMENT II: Section 2.2, Page 2-3, 3rd Paragraph (of the section), 2nd Sentence
This sentence says, "Test Pitting was completed at 17 of the geophysical anomaly areas." For the sake of completeness and clarity, please list which 17 of the 25 geophysical anomaly areas had test pits completed on them.

RESPONSE:
The text was supplemented as follows "Test pitting was completed at 17 of the geophysical anomaly areas including anomaly area 4 and areas 10 through 25. As recommended, test pits were advanced to a depth of 5 feet using a track hoe and shovels."

COMMENT III: Section 2.2, Page 2-3 3rd Paragraph (of the section) 4th Sentence
This sentence says, "Following the excavation seven subsurface soil samples were collected from depths ranging from 2 to 3.5 feet below land surface (bls) underneath the buried drum area." Please comment on whether this depth was, in fact, beneath the buried drums that were encountered. Please also comment on whether the test pits were excavated to a depth of 5 feet bls, as had been recommended in Section 2.1 of this report. Were the subsurface soil samples collected from such a relatively shallow depth bls in order to remain above the water table? Please comment.

RESPONSE:
The soil samples were collected immediately beneath the buried drums generally 2 to 3.5 feet below land surface. The test pits were completed to a depth of 5 feet below land surface, as recommended. The soil samples were collected above the water table and

depth to groundwater measurements ranged from 8.73 to 16.79 feet below top of casing in onsite monitoring wells

The text was supplemented as follows “Following the excavation, seven subsurface soil samples were collected. Due to the shallow burial of the drums, soil samples were collected immediately beneath the buried drums at depths ranging from 2 feet to 3.5 feet below land surface. All soil samples were collected above the water table.”

COMMENT IV: Section 2.2, Page 2-3, 5th Paragraph (of the section), 1st Sentence. Please confirm that these five additional soil samples were collected from the “Soil Boring and Monitoring Well Locations” shown on Figure 2-2, and add text to this paragraph to make that perfectly clear.

RESPONSE:

The five additional soil samples were collected from the soil boring and monitoring well locations shown on Figure 2-2.

The text was supplemented as follows “In addition to the test pitting subsurface soil sampling, a direct-push technology (DPT) rig was used to collect five additional soil samples from above the water table. The additional soil samples were collected at locations corresponding to the soil boring and monitoring well locations shown on Figure 2-2. The samples were analyzed for the same parameters as the previous subsurface soil samples.”

COMMENT V: Section 3.2, Page 3-1, 1st Paragraph.

The word “delineate” is misspelled three times in this paragraph and the word “anomaly” is misspelled once. Please spell them correctly. The 2nd sentence lists five anomaly areas, yet fails to include geophysical anomaly area 13, which on Page 2-6 was included as an area with exceedances that were not excavated. Please explain why anomaly 13 was not include, and include it, if appropriate.

RESPONSE:

Corrections to the text were made for the misspelled words. Geophysical Anomaly Area 13 was inadvertently omitted from the text and has been included in the revised document.

COMMENT VI: Section 3.2, Page 3-2, 3rd Paragraph (of the section), Bullet List.

The 1st sentence of this paragraph says, “The specific metals to be analyzed for each anomaly area are as follows:” However, SVOCs are included in the lists. Please substitute the word “parameters” or “analytes” for “metals”, or eliminate SVOCs from the lists. Also, vanadium is misspelled twice in this paragraph. Please spell it correctly. Also, Anomaly Area 23 ought to be given its own bullet list. Please make it so.

RESPONSE:

The first sentence of the 3rd paragraph was reworded substituting the word “parameters” for “metals”. Text corrections were made for the spelling of “vanadium”. Finally, a bullet was added for Anomaly Area 23.

COMMENT VII: Table 3-1.

For the convenience of the reader, please add the acronyms “TCL” and “SVOCs” to the NOTES section of this table, as they are not included in this table. Also, please remove “mL”, “oz”, and “HNO₃” from the NOTES section of this table, as they are not included in this table. Also, in the “Preservation” column, please capitalize the word “cool” in the 1st row and remove the semicolon in the 2nd row.

RESPONSE:

Corrections were made to Table 3-1 as follows: The acronyms “TCL” and “SVOCs” were added to the NOTES section of the table. As directed, “mL” and “HNO₃” were deleted from same. However, “oz” was left in the NOTES section of the table, because it is used in the sample volume column of the table. In the “Preservation” column, the word “cool” was capitalized in the 1st row and the semicolon was removed from the 2nd row.

COMMENT VIII: Section 3.2, Subsurface Soil Sampling Plan, Page 3-3, 1st Paragraph (of the subsection).

The word “delineate” is misspelled once in the first sentence. Please spell it correctly. The 2nd sentence lists five anomaly areas, yet fails to include geophysical anomaly area 13, which on Page 2-6 was included as an area with exceedances that were not excavated. Please explain why anomaly area 13 was not included, and include it, if appropriate.

RESPONSE:

The text was corrected for the spelling of “delineate”. Geophysical Area 13, which was inadvertently omitted, was added to the list of anomaly areas.

COMMENT IX: Section 3.2, Subsurface Soil Sampling Plan, Page 3-3, 2nd Paragraph (of the subsection).

The 4th sentence of this paragraph mentions the 20 surface soil borings that were already discussed in the previous subsection. Please remove the reference to these surface soil borings from this subsection. Please add the word “subsurface” to the 5th sentence of this paragraph so that the sentence reads, “The proposed subsurface soil investigation area is shown on Figure 3-2.”

RESPONSE:

The indicated corrections were made to the Sampling and Analysis Plan text.

COMMENT X: Section 3.2, Subsurface Soil Sampling Plan, Page 3-3, 3rd Paragraph (of the subsection), 1st Sentence.

The word “vanadium” is misspelled once in this sentence. Please spell it correctly.

RESPONSE:

The spelling of “vanadium” was corrected.

COMMENT XI: Figure 3-2.

The locations of the two proposed subsurface soil samples within the footprint of the former tennis court location that are not directly adjacent to Geophysical Anomaly 15 appear to be rather arbitrary. Please comment on the wisdom of performing a search for geophysical anomalies within the footprint of the former tennis court location now that the tennis court has been removed. Mind you, this comment assumes that the March 1994 geophysical survey did not include the footprint of the former tennis court location (owing to cultural clutter and its resulting interference in geophysical surveys), and that the tennis court was constructed sometime after drums were disposed of in this area.

RESPONSE:

The purpose of the soil borings adjacent to Geophysical Anomaly Area 15 is not to search for additional anomalies but instead, as indicated in the text on Page 3-3, “to address potential subsurface soil contamination not previously evaluated due to the presence of the structure.” The Interim Removal Action Report (CH2M Hill, 2003) indicated that delineation sampling and excavation activities were terminated at the edge of the tennis courts because of the presence of the structure. Because the structure has now been removed additional sampling will be completed to confirm the extent of contamination.

Additional investigation for geophysical anomalies is not believed warranted. Because of the shallow nature of the drum disposal and that construction activities for the tennis courts would require the installation of footers and grading of the site. It is believed that any nonnative materials encountered would have been removed.

COMMENT XII: Figure 3-3.

Eight proposed shallow monitoring well and soil boring locations should be shown on this figure, not seven which are currently shown.

RESPONSE:

Figure 3-3 has been updated to include one additional shallow monitoring well location for a total of 8 locations.

COMMENT XIII: Table 3-2

For the convenience of the reader, please add the acronyms “CLP”, “TCL”, “VOCs”, and “TAL” to the NOTES section of this table. Also, please make the word “degree” plural in the NOTES section of this table.

RESPONSE:

For clarification the acronyms “CLP”, “TCL”, “VOCs”, and “TAL” were added to the NOTES section of the table. An “s” was added to the word “degree” to make it plural.

COMMENT XIV: Section 3.2, Aquifer Testing, Page 3-9, 1st Paragraph (of the subsection), 2nd Sentence.

It is assumed that the acronym “UST” as used here stands for Underground Storage Tank, however, for the sake of clarity, please define the acronym here and/or include it in the list of acronyms at the beginning of the report.

RESPONSE:

The acronym “UST” was added to the Acronyms list located on page V.

**RESPONSE TO COMMENTS FROM
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
FOR THE SAMPLING AND ANALYSIS PLAN FOR REMEDIAL
INVESTIGATION AT SITE 43, NAVAL AIR STATION PENSACOLA,
PENSACOLA, FLORIDA**

COMMENT 1: Page 3-3, Section 3.2, Subsurface Soil Sampling Plan:

The Department recommends reviewing the latest version of the Global RBCA Rule 62-780, in section 62-780.600(5) (c) 1, which describes how to conduct soil sampling when the remedial approach for the surface soil is proposed to be 95% UCL. To obtain the latest version of this rule go to the following URL address.

<http://www.dep.state.fl.us/waste/categories/wc/pages/ERCAAdoptionHearing020205.htm>

When you are on this page scroll down until you get to the text shown below and click on the "Text of Rule and Table", at this point look for the section given above for soil sampling details required when using 95% UCL.

Chapter 62-780 Contaminated Site Cleanup Criteria:

- Text of Rule and Table

RESPONSE:

TtNUS has reviewed the rule and compared it to the proposed sampling plan. Although the sampling plan is not overly detailed we believe the two documents are compliant. However, the text will be supplemented with the following insert:

“The sampling methodology will be compliant with FDEP’s Global RBCA Rule 62-780, including section 62-780.600(5) (c) 1, which describes how to conduct soil sampling when the remedial approach for the surface soil is proposed to be 95% UCL.”