



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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NAS PENSACOLA
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SEP 18 1992

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda Martin
Remedial Activities Branch
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston, South Carolina 29411-0068

Re: Review of Draft Sampling and Analysis Plan (SAP) for OU 10;
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Ms. Martin:

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The Environmental Protection Agency (EPA) has completed its review of the Draft Sampling and Analysis Plan (SAP) for Operable Unit (OU) 10, which was received in this office on August 24, 1992. Enclosed are our comments.

Given the secondary, or supporting nature of this document, EPA recommends the following alternate schedule for finalization of the SAP:

1. Navy provides written response to those comments with which they disagree within 14 days of receipt of all comments from the FFA parties
2. Parties schedule a meeting or conference call as needed to resolve any outstanding issues
3. Navy submits Draft Final SAP within 30 days following submittal of the response to comments.
4. The parties notify the Navy of any additional problems with the document within 30 days of receipt of the Draft Final SAP. If none are identified within this time frame, the Draft Final automatically becomes the Final.

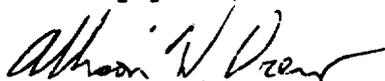
EPA is aware of the Navy's desire to begin field work at OU 10 as soon as possible. Field work may begin at any point in the above process, so long as the Navy is willing to assume the risks associated with proceeding without a final, approved SAP.

Also, in accordance with Section XV.B. of the FFA, EPA is informing the Parties of its intent to perform field oversight and possibly collect split samples during the early stages of the Remedial Investigation for OU 10. So that we may select the most appropriate dates for field oversight,

please provide us with an anticipated field schedule, including start dates and the general time frames during which each field activity will be performed, at your earliest convenience. Upon receipt of this information, EPA will notify the Parties of the dates on which we intend to perform oversight.

Should you have any questions or concerns regarding these matters, please contact me at 404/347-3016.

Sincerely yours,



Allison W. Drew, RPM
Department of Defense Remedial Section
Federal Facilities Branch

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDER

TECHNICAL REVIEW AND COMMENTS
DRAFT SAMPLING AND ANALYSIS PLAN FOR OPERABLE UNIT 10
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENT:

1. The Sampling and Analysis Plan (SAP) does not state what contaminants are known or suspected of being present at the site, or how they were released to the environment. This information must be provided in the SAP text.

SPECIFIC COMMENTS:

1. Page 2-1, Paragraph 1:

As agreed to by the three parties to the Federal Facilities Agreement (FFA), operable Unit (OU) 10 has been expanded to include Site 13: Magazine Point Rubble Disposal Area. The text must be revised to indicate this.

2. Page 2-4, Paragraph 2:

The cross section in Figure 2-3 illustrates only the surficial zone of the Sand and Gravel Aquifer, not the three major hydrogeologic units listed in this paragraph. Please revise either the text or the table accordingly.

3. Pages 2-4 through 2-7, Section 2.3:

Given the volume of information which has been collected for OU 10, there should be a significant amount of site-specific hydrogeologic information available, particularly for the Sand and Gravel Aquifer. For instance, is the cross section shown in Figure 2-3 representative of conditions for the entire Operable Unit? Further information regarding site-specific conditions must be provided for all three hydrogeologic units. If site-specific information is not available, this should be stated.

4. Page 3-2, Paragraph 1:

The technical justification for placing a carbon filter on the OVA to determine methane concentrations must be presented and explained. In EPA's opinion, the technical merit of this method is questionable.

5. Page 3-2, Section 3.3:

The following comments, originally provided on the RI/FS Work Plans for Site 27, are also applicable to the present SAP:

A. The instruments used for the radiation surveys performed during the Site 25 and 27 Phase I investigations are not adequate for the low microR levels detected in the general (i.e. non-hot spot) areas. The 1.0 uR/hr readings recorded for these sites using the Bicron are too low to be accurate. There is no area with background levels this low. Typical background levels for Florida (away from phosphate areas) range from 5 to 10 uR/hr. EPA recommends using a Pressurized Ion Chamber (PIC) and Ludlum microR-meter. When calibrated for the Ra-226 gamma energies these are much more accurate in providing real radiation exposure rates.

B. It is **assumed** that the **dpm** and **uR/hr** readings collected for Sites 25 and 27 were relative, as opposed to true, radiation readings. In the future, the instrument used must be calibrated against Ra-226, and the radiation units given must be explained against actual radiation units and background levels.

6. Page 3-3, Section 3.5:

EPA recommends driving the **soil** gas probes a few feet further and collecting groundwater samples for analysis by the portable **GC**. This direct measurement of the contaminant plume would be much more **informative** than a strict soil gas analysis. EPA's Environmental Services Division (ESD) has found the Geoprobe to be an excellent **tool** for this type of work. It may even be possible to **drive** the Geoprobe to the screen depths of the intermediate wells.

The soil gas sampling point must be constructed of stainless steel pipe. Galvanized steel should not be used.

7. Page 4-2, Table 4-1:

This table indicates that no equipment rinsate blanks are associated with the soil samples. Please correct the table to show that equipment rinsate blanks will be collected from the **soil** sampling equipment at the frequency specified in Table 6-1 (p. 6-3). A minimum of three (3) rinsate blanks should be collected and analyzed for analytical suite A.

8. Page 4-6, Section 4.2:

It will probably be advisable to collect samples of free product/saturated media as-a part-of the FS data collection efforts.

9. Page 4-7, Bullet 2:

What is the **disposable** sampling equipment constructed of, and what cleaning procedures are used in its' decontamination? Will equipment rinsate blanks be collected from this equipment to ensure that it **is** properly decontaminated?

10. Pages 4-9 through 4-10, Section 4.5.1:

The text must be expanded to provide a description of the general sampling **strategy/objectives** which will be **used** to select surface water and sediment sampling locations. How will the information collected on the surface water hydrodynamics be used to modify any presumed appropriate surface **water/sediment** sampling locations and select the final sampling locations?

11. Page 4-10, Section 4.5.3:

"Soil sampling locations will be based on the results of the soil gas survey." The text must also state how these results will be used (i.e. criteria, strategies, objectives) to select the final soil sampling locations.

12. Page 4-10, Section 4.5.3:

In accordance with Region IV guidance, surface soil samples must be collected from a depth of 0-1'.

13. Page 4-11, Paragraph 2:

"The soil samples will be labeled and thermally preserved." Please define the term "thermally preserved".

14. Page 4-12, Paragraph 1:

EPA recommends the use of stainless steel well casings and screen for this field investigation. While the use of PVC materials may not significantly influence the data for this project, EPA does not feel that it is the best choice. If PVC is selected, however, it must meet the specifications of NSF Standard 14 as well as ASTM schedule 40. PVC must not be solvent rinsed or cleaned with hot water. Intermediate and deep PVC wells must not be grouted with cement materials.

15. Page 4-13, Figure 4-1:

The following corrections and additions must be made to this figure:

A. The "Former Surge Tank" is actually the "Former Surge Pond"

B. Sampling locations 3 (OM-71) and 5 (GM-72) should be labeled on this figure.

16. Page 4-15, Figure 4-3:

The concrete pad must extend a minimum of 2 feet below ground surface around the borehole.

17. Page 4-16, Paragraph 3:

"Samples collected for metals analysis will not be preserved or filtered." This statement is inconsistent with the preservation requirements provided in Table 4-3 (p. 4-17) and the Region IV ECBSOPQAM. Samples collected for metals analysis must be preserved. Please make the appropriate correction to the text.

18. Page 4-20, Section 4.6:

Field sampling equipment must be decontaminated in accordance with Section B.8 of the ECBSOPQAM. Sections 8.3 through B.5 are not intended for field cleaning.

19. Pages 4-21 through 4-32, Table 4-3:

Please make the following corrections to this table:

A. Page 4-25 - The sample preservation requirements of method 602 state " 1:1 HCl pH 2^o". Please correct this typographical error.

B. Page 4-30 - The sample preservation requirements of method 8240 states "HCl^o". Please correct this typographical error.

C. Page 4-31 - The container size for semivolatle organic compounds is inadequate. In accordance with CLP protocol, the recommended sample container is 1-gal. amber glass or 2.5-gal. amber glass.

D. Page 4-32 - The container size for pesticides/PCBs is inadequate. In accordance with CLP protocol, the recommended sample container is 1-gal. amber glaas or 2.5-gal. amber glass.

20. Pages 4-39 through 4-40, Section 4.9:

This section must be expanded to address the disposal of isopropanol used in equipment decontamination.

21. Page 5-2, Section 5.2.1:

According to this section, the analytical methods are listed in Table 4.1. However, Table 4-1 provides incomplete information regarding the analysis methods and must be revised as follows:

A. Many of the analysis method numbers are not provided.

B. The listing of analytical methods must include the extraction methods used.

C. The sources of the methods are not referenced. If CLP methodology is used, then the statement of work document number should be included as a reference.

22. Page 6-3, Table 6.1:

The following additional quality control samples must be included in the equipment/material blanks.

A. If potable water is used during drilling activities, this water must be tested for contamination.

B. The ASTM type III water used during equipment decontamination must be tested for contamination.

23. Pages 7-1 through 7-7, Section 7.0:

The CLP data must be validated using procedures in "National Functional Guidelines for organic Data Review," June 1991 and "National Functional Guidelines for Inorganic Data Review," July 1988. Data from other analyses should be validated using procedures appropriate to the method of analysis. Independent data validation is recommended.

24. Appendix D, Bullet 6:

The sampled material must not be composited prior to filling the volatile sample container. Following collection of the aliquot for VOC analysis, the remainder of the sample must be thoroughly composited and homogenized.

25. Appendix H, Bullet 2:

According to this Appendix, monitoring well stabilization criteria is contained in section 5.1. However, Section 5.1 does not provide these criteria. The SAP must be revised to include this information.

26. Appendix I, Step 5:

A leader of Teflon coated stainless steel wire must be placed between the bailer and the line. This leader is not disposable and must be decontaminated along with the bailer.

27. Appendix L:

The following comments are provided:

A. All downhole drilling, sampling, and associated equipment which will come into contact with the downhole equipment and sample medium must be cleaned in accordance with the ECBSOPQAM. This means that some equipment which is considered "nonsampling" in the document (e.g. augers) must be decontaminated with the same procedure used for the sampling equipment. The SAP must be revised to reflect this.

B. Region IV SOP requires that the sampling equipment be rinsed twice, not once, with isopropanol.

C. Samples of the filter pack, bentonite, grout and any drilling fluids must be collected for analysis.