



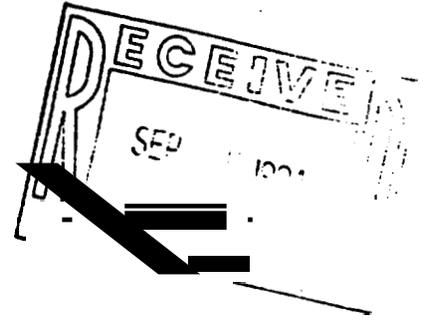
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION IV

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

SEP 28 1994



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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

NAS PENSACOLA

5090.3a

Commanding Officer  
Attnt Mr. Bill Hill - Code 1851  
Southern Division  
NAVFACENGCOM  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

SUBJ: Revised Comprehensive Sampling and Analysis Plan  
NAS Pensacola, Florida; EPA Site ID No.: FL 9170024567

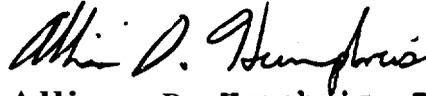
Dear Mr. Hill:

The Environmental Protection Agency (EPA) has completed its review of the Navy's Revised Comprehensive Sampling and Analysis Plan (CSAP), which was received in this office in July 1994. Our comments are enclosed. EPA will consider the CSAP for approval upon receipt of a revised version of this document which adequately addresses our enclosed comments.

As mentioned in EPA's review of the initial draft of this document, the CSAP is a critical component of all RI/FS Work Plans. At present, all RI/FS Work Plans, most of which have been conditionally approved, contain numerous references to the previously-submitted, unacceptable Generic Quality Assurance Project Plan (GQAPP). As stated in correspondence dated June 1993 from EPA to the Navy, all final site-specific and generic SAPs will supersede the GQAPP. Therefore, final EPA approval of all RI/FS Work Plans is dependent upon EPA acceptance of the CSAP. This approval will provide the Navy with written assurance that the work being conducted is satisfactory for RI/FS purposes.

In order to facilitate rapid finalization of the CSAP, please submit the revised CSAP to this office within thirty (30) calendar days of your receipt of this letter.

Sincerely,



Allison D. Humphris, RPM  
Department of Defense Remedial Section  
Federal Facilities Branch

**Enclosure**

cc: Ron Joyner, NAS, Pensacola  
Eric Nuzie, FDEP  
Henry Beiro, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENTS  
COMPREHENSIVE SAMPLING AND ANALYSIS PLAN  
NAVAL AIR STATION (NAS) PENSACOLA  
PENSACOLA, FLORIDA

1. Pages 3-1 through 3-3, Section 3.1:

EPA looks forward to receiving a copy of the expanded, updated well inventory in the near future.

2. Page 8-1, Section 8.0, Paragraph 3

Section 8 lacks sufficient detail regarding the decision-making process and/or the field investigatory steps to be used in completing an adequate ecological risk assessment. The absence of this information is not critical for the aquatic sites, since it can be presented in the RI/FS Work Plans for OUs 15-17. In contrast, the RI/FS Work Plans for terrestrial sites are being finalized through the approval of site-specific SAPs. Neither the original Work Plans (prepared by E&E) nor the site-specific SAPs for terrestrial sites contain this information. It must therefore be incorporated into either the CSAP or the site-specific SAPs. Clarification and agreement by the Parties up front on an acceptable approach for conducting the terrestrial ecological risk assessment is critical, particularly since "ecological risk assessment has not yet evolved to where standard risk can be calculated, as in human health risk assessments." (CSAP, Section 8.4). Early communication and consensus on this issue will facilitate the timely development of adequate RI Reports.

Following are some specific comments regarding the information which should be included in the CSAP (or SAPs) in order to ensure completion of an adequate ecological risk assessment for terrestrial sites:

A. Since there are currently no recommended soil screening values with which to compare soil contaminant levels, the Navy should develop a "criteria list" for use in determining whether or not to pursue field and laboratory testing beyond the chemical assessment stage (phase IIA). Following is a recommended list of factors:

- What is the frequency of contaminant detection?
- Are contaminants present (especially inorganics) at or above twice mean background (elevated levels)?
- Are elevated contaminant concentrations widespread or localized?
- What is the mode of action (e.g. toxic effects) of the contaminant(s) detected? Can they biomagnify?
- What are the potential receptor species and habitats?

B. Phase IIB, if performed at terrestrial sites, should not be limited to toxicity testing (p. 8-9, paragraph 3). Other measures, such as soil contaminant bioaccumulation tests, and food chain modeling (ingestion), should also be considered and implemented. Also, specify the type of toxicity test to be performed (e.g. bulk soil or soil elutriate).

C. In October 1993, the Parties held a conference call to determine the contents and structure of an acceptable ecological risk assessment. The results of this conference call, and particularly the outline which was developed, should be referenced, quoted and/or discussed in the CSAP as appropriate. This is necessary to ensure that all data needed to complete an acceptable risk assessment for terrestrial sites is collected during the field stage of the investigation.

3. Pages 8-11, Paragraph 2:

The toxicity testing of reference area samples must be done at the same time as testing of all samples from the corresponding areas of concern in order to lessen the potential for variability due to test conditions. If the Navy can demonstrate low variability in toxicity test results for reference area samples through repeated sampling and testing efforts, EPA may consider modifying this requirement in the future.

Also, please clarify that a chemical analysis will be performed on a split of all samples collected for toxicity tests.

4. Plate 1:

This figure must be revised to more accurately locate each of the terrestrial sites. For example, according to the current figure, Site 26 overlies Site 11. This illustration is inconsistent with previous figures and documents submitted for these sites. Also, given the large size of the Plate and the volume of environmental data which the Navy has collected to date, it should be possible to locate site boundaries more accurately than shown.

5. Plate 2:

Please recheck this figure to ensure that the full length of the sewer line is depicted, including both active and inactive segments. The current figure differs somewhat from previous figures generated for the line. Also, either revise this plate to include the terrestrial sites which are co-located with the line, or add the line to Plate 1, in order to illustrate the overlap of the sewer line with other known terrestrial sites.