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January 23, 1995

Florida Department of Environmental Protection
Federal Facilities Coordinator
Attn: David Clowes
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Draft Sampling and Analysis Plan
Site 36 IWTP Sewer Line
NAS Pensacola
Contract # N62467-89-D-0318/CTO-063

Dear Mr. Clowes:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit two copies of the Draft Sampling and Analysis Plan for Site 36 — the IWTP Sewer Line at the Naval Air Station Pensacola in Pensacola, Florida. Please be advised that John Mitchell of FDEP had no specific comments on the draft IWTP Sewer Line Chevalier Field Area SAP submitted May 9, 1994. Your comments have not been received to date, and are therefore not incorporated into this draft SAP.

Please let me know if you have any questions or comments regarding the plan.

Sincerely,

EnSafe/Allen & Hoshall

Allison L. Dennen
Task Order Manager

Enclosure

cc: Mr. Bill Hill, SOUTHNAVFACENGCOM without enclosure
EnSafe/Allen & Hoshall file without enclosure
EnSafe/Allen & Hoshall Pensacola file without enclosure

RESPONSE TO COMMENTS
Made by the U.S. Environmental Protection Agency (USEPA) - Region IV

SAMPLING AND ANALYSIS PLANS: SITES 12, 26 & 36 (partial)
NAVAL AIR STATION - PENSACOLA

General Comments:

COMMENT 1:
The Sampling and Analysis Plans state that the USEPA Risk Based Concentrations (RBCs) developed by Region III and FDEP Cleanup Goals will serve as Preliminary Remediation Goals (PRGs) for soils. These documents should also specify the values which will serve as PRGs for groundwater and, if applicable, sediment and surface water. In general, groundwater data should be confined to the Safe Drinking Water Act (SDWA) Maximum Concentration Levels (MCLs).

RESPONSE:
The additional information will be included in the SAP. The Preliminary Remediation Goals (PRGs) for groundwater will be the Florida Water Quality Standards and the Safe Drinking Water Act (SDWA) Maximum Concentration Levels (MCLs).

COMMENT 2:
If groundwater contamination, or the potential for soil contaminants to leach to groundwater, is found to exist at any of these sites, it will probably be necessary to develop site-specific soil action levels for each detected contaminant. The EPA Region III RBCs may not be protective of groundwater, and FDEP Cleanup Goals may be overly conservative. The need to develop these numbers, and methodology used to derive them should be presented in the appropriate Technical Memo (i.e., the memo which presents the groundwater investigative results).

RESPONSE:
Site-specific soil action levels, for each detected contaminant, and the methodology used to derive them will be developed during Phase II of the investigation, and included in the report which presents the groundwater investigation results.

COMMENT 3:
All references to the RBCs should clearly indicate which of the Region III RBCs are "applicable" (i.e., residential or industrial). The text should also clearly indicate which RBC table was used (i.e., Hazard Index of 1 or 0.1 used in calculating the RBCs, which update of the RBC table was used).

RESPONSE:
These additions will be made. The RBCs for non-carcinogens in residential soil from the most recent RBC table (currently Third Quarter 1994) shall be applied. The RBCs for carcinogens in residential soil will be from the most recent table in which a Hazard Index of 1 was used (currently First Quarter 1994).

COMMENT 4:
Use of the term "Contaminants of Concern" in these documents is not appropriate. This term, or preferably "Chemicals of Concern" (COC), should be reserved for chemicals which exceed a 10^{-6} risk level or HI of 0.1 in baseline risk assessment scenarios which exceed 10^{-4} risk level or HQ or 1. Please revise the text accordingly.

RESPONSE:
The use of the term "Contaminants of Concern" will not be continued, and the text shall be revised accordingly.

COMMENT 5:
During recent Partnering Meetings, the Parties have agreed that if the contaminants detected exceed the agreed-upon PRGs, then further contaminant delineation and/or CERCLA response actions will be necessary. In order to ensure that these objectives are met, an important Data Quality Objective of these investigations should be to ensure that the laboratory quantitation limits for all analyzed samples approximate the agreed upon PRGs. The attainment of these quantitation limits is particularly critical for sites where the levels of contamination are expected to be low. If the quantitation limits obtained greatly exceed the agreed upon PRGs, then re-sampling and re-analysis may be required before final decisions regarding delineation and/or response actions can be made. The decision to re-sample and re-analyze, however, should be made on a sample-specific basis. As agreed to by the Parties during the June Partnering Meeting, Special Analytical Services will be performed as needed to complete Phases 2 and 3 (delineation and confirmation) of these site investigations.

RESPONSE:
The Navy agrees that on an as needed basis, as agreed by the Tier 1 Partnering Team, special analytical services will be utilized to provide Quantitation Limits necessary to evaluate specific analytes. The Navy also wishes to remind all parties that special analytical services may not be able to evaluate low detection limits on all target analytes under all circumstances. The analytical laboratory will supply a comparison of instrument detection Limits (IDLs) versus contract required detection limits (CRQL).

COMMENT 6:
Regarding the reports to be submitted for these sites, it may not be necessary to submit a Technical Memorandum upon completion of Phase II (delineation). If Phase II results *can* be

provided to the Regulatory Agencies in the form of tables and figures, the Parties may be able to discuss and agree upon Phase III (confirmatory) sampling locations in a meeting. Also, for screening sites, the final investigatory report should be the Preliminary Site Characterization Report. For RI sites, or for screening sites which are upgraded to RI sites, the final report should be the RI Report. Only one of these two reports should be prepared for each site. (i.e., as stated in the SMP, only an RI Report should be prepared for screening sites which are upgraded to RI sites).

RESPONSE:
The comment has been noted. Phase II results will be presented to the regulatory agencies in the form of tables and figures, The final report shall be a Site Characterization Report.

Comments applicable to Site 36 only:

COMMENT 1:
Section 1.0:
The current *SAP* deals only with that portion of Site 36 which is co-located with BRAC construction activities. The remainder of Site 36 "shall be investigated during additional phases," beginning on November 20, 1994 (per approved FY94 *SMP*). Plans to submit the remainder of the Site 36 *SAP* should therefore be submitted at least sixty days prior to the field start date, in order to allow time for regulatory review and revision/approval. EPA concurrence on Navy decisions regarding the investigative status of Site 36 (i.e., NFI vs. RI) is dependent on the adequacy of the screening investigation as presented in the *SAP*.

RESPONSE:
The Draft *SAP* **now contains details** for **the entire Site.**

COMMENT 2:
Section 2.1:
A figure illustrating all of Site 36 should be provided in the *SAP* so that the relationship of the current "partial" investigation to the "full" Site 36 investigation *can* be determined.

RESPONSE
A site plan showing the entire Site is presented in the Draft *SAP*.

COMMENT 3:
Section 2.2:
This section should include a description of all the Navy's current plans for the sewer line (i.e., closure and associated BRAC program activities, RCRA program requirements, any other regulatory program requirements). *All* such activities, which may (i) impact the Site 36 investigation or (ii) facilitate the investigation by providing additional information, should be

described "up front". Unless this is done, EPA cannot guarantee that the investigations proposed in this SAP will be adequate to make final decisions regarding the investigative or response action status of Site 36. A clear understanding and coordination of the multiple ongoing activities at this Site will also benefit the Navy by reducing the potential for duplicative effort or missed program requirements.

RESPONSE:
Agreed. A description of all the Navy's current plans for the sewer line is included in the Draft *SAP.*

COMMENT 4:
Section **4.3,** Building **3380** Area:
"The soil contamination has been adequately addressed in ABB's Contamination Assessment Report *(CAR)*; therefore no soil shall be sampled in the Building **3380** investigation." Adequate justification and documentation to support this conclusion must be provided in order for EPA to agree to "No Further Action" status for the soils at this location. Does the soil contamination detected at Building **3380** consist solely of petroleum constituents? Were full scan analyses performed on any of the soil samples collected from this area?

RESPONSE:
The soil investigation at Building 3380 conducted by E/A&H is summarized in Section **2** of the *SAP.* Full scan analysis was performed on the soil samples collected.

COMMENT **5:**
Section **4.4.2:**
Stainless steel is recommended for the temporary wells. **PVC** that becomes stained or heavily scratched from repeated usage must be discarded, because it *can* no longer be properly decontaminated. In addition, the sand in the wells must be present above the screen and be at least **1-2** feet below the water table for the proposed method to work.

RESPONSE:
Your comments are noted. The PVC well screen and casing will be not be reused. Also, the temporary well design using Ottawa Sand will not be used. A Navy field study performed during the Chevalier Field area investigation found no difference in the sample turbidity from wells constructed using the Ottawa Sand and those installed using the typical temporary monitoring well design.