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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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APR 27 1995

4WD-FFB

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Subj: Draft Sampling and Analysis Plan (SAP); Preliminary Site
Characterization Summary: AVGAS Line Area;
Site 36: Industrial Waste Sewer Line
Naval Air Station (NAS) Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) has completed its review of the following documents for Site 36 (Industrial Waste Sewer Line) at the Naval Air Station (NAS) Pensacola:

*Draft Sampling and Analysis Plan (SAP), and
Preliminary Site characterization Summary: AVGAS Line Area*

Our comments are enclosed.

EPA looks forward to resolving the issues addressed in our comments at the May 31, 1995 Project Manager's meeting. Please contact me at (404) 347-3016 if you have any questions or wish to discuss these issues prior to the meeting.

Sincerely Yours,

Allison D. Humphris
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS Pensacola
David Clowes, PDEP
Henry Beiro, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENTS
DRAFT SAMPLING AND ANALYSIS PLAN (SAP): SITE 36
DRAFT TECHNICAL MEMORANDUM: SITE 36 - AVGAS LINE AREA
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

DRAFT SAMPLING AND ANALYSIS PLAN:

1. Page 9, Section 2.3.1:

The text and Figures 2-2 and 2-3 fail to clearly indicate the number and locations of soil, groundwater and sediment samples which were collected during that portion of the Site 36 investigation which was completed to facilitate BRAC construction activities. Please address the following apparent discrepancies as appropriate:

A. According to the text, 37 soil borings were installed. Figure 2-2 illustrates 2 soil borings and Figure 2-3 illustrates 12 soil borings (total: 14 soil borings).

B. According to the text, 22 temporary wells were installed. Figure 2-2 illustrates 24 temporary wells..

C. Were any of the permanent wells illustrated in Figure 2-2 sampled? If so, the number and locations should be indicated in the text.

D. Illustration of "Building 3380" sampling locations for all media in Figure 2-3 would facilitate evaluation of the relative locations of soil and groundwater sampling points.

E. According to the text, sediment samples were collected from manholes. These locations should be illustrated in Figure 2-2. Also, it would be helpful to label all manhole numbers on some figure, since specific manhole numbers are referenced throughout the SAP text.

F. According to the text and figures, the Site 36 investigation includes the area adjacent to Building 3380. The Executive Summary should be revised to state this fact, along with the decision made at the December 1994 Partnering meeting to upgrade appropriate portions of Site 36 (inclusive of Building 3380) to RI status upon completion of this screening investigation.

2. Pages 9 through 18, Section 2.3.2:

A. The same contaminant classes (i.e. VOCs, SVOCs, metals) were detected in both soil and groundwater samples. As such, it would be extremely useful to illustrate the data in a manner which facilitates direct comparison (and hence, evaluation) of the results for these two media. One possible way of doing this would be to illustrate soil results for a given contaminant(s) on a clear plastic overlay, followed by groundwater results for the same contaminant(s) on the next (underlying) page. Since this comment pertains to data presentation, it may be addressed during preparation of the draft

report for Site 36, rather than through revision of this SAP.

B. In December 1994, EPA commented on the Removal Action Plan submitted by the Navy for the soils adjacent to Building 3380 (see Attachment 1). Comment 7 of this review, regarding additional sampling needs, must be addressed in this SAP. Comments 3 through 5, regarding sampling activities and results, Contaminant Source Survey (CSS) results, and general information gathering results, must be addressed in the draft report which is prepared for Site 36. EPA is still awaiting receipt of a revised Removal Action Plan or Report which adequately addresses our comments.

3 Page 18, Section 2.3.3:

This subsection is very helpful. EPA recommends that this subsection become a standard subsection for all media in all reports, even if it states nothing more than that the detection limits for all analyses were at or below the required levels. Also, all data presentations should include a clear list of problematic analyses and detection limits in order to facilitate Tier 1 evaluation of, and concurrence on, all resampling plans.

4. Page 21, Section 2.4.2:

This section should be updated to reflect the current decisions made by Tier 1 regarding portions of Site 36 impacted by removal of the AVGAS line. Namely, that little or no soil will actually be removed during the AVGAS line removal, and hence, what little soil is removed during this action may be replaced back in the hole. Furthermore, at a later date, the BRAC construction contractor shall remove all soils adjacent to the AVGAS line which contain contaminants in excess of the agreed-upon PRGs. The specifics of this removal action (such as the actual area of soil to be removed) should be presented in an appropriate document (e.g. Removal Plan, Action Memo) for Tier 1 concurrence. This latter document must also address the following concerns, which were not addressed in the present SAP:

(i) contingency plans - if the first round of confirmatory samples shows contaminant levels in excess of the PRGs, how will removal plans be adjusted to ensure that the goal of removing all soil contamination in excess of the PRGs is achieved?

(ii) 36GR07 - soil excavation and confirmatory sampling must also be performed at this location, where benzo(a)pyrene was detected at a concentration significantly exceeding the agreed-upon PRG (300 ppb vs. 88 ppb).

5. Page 22, Section 3.1:

The general approach presented for conducting the Contaminant Source Survey (CSS) is acceptable. One presumed use of the CSS is to evaluate the need for additional data collection efforts (i.e. beyond those currently presented in the SAP). As such, the results and conclusions of the CSS should be presented during a Tier 1 meeting for Tier 1 concurrence. This would preferably be done prior to field

demobilization. Use of the CSS in developing the sampling strategy should be indicated in *Section 4.3: Sampling Locations and Rationale*.

6. Page 25, Paragraph 3:

Presumably, Phase II samples (if collected) will only be analysed^z for parameters exceeding the PRGs, and Phase III confirmatory samples (if collected) will be analysed for the full TCL/TAL. If this is the case, then the Baseline Risk Assessment (BRA) cannot be 'completed during Phase II', as indicated on page 3 of the SAP. Rather, the purpose of Phase III is to collect the high quality data needed to complete the BRA. Please revise the SAP text as needed for clarity and consistency.

7. Page 32, Paragraph 1:

A. According to the text, portions of the "IWTP Line - Site 36" are above the water table. It was EPA's understanding that only that portion of the IWTP line being investigated as part of Site 30 (OU 2) is above the saturated zone. The general sampling rationale presented is sound. However, the draft report prepared for Site 36. must include current information regarding the relative depths of the IWTP line and the water table (e.g. specific locations and a water level map for the entire site).

B. How will the soil borings advanced along these "unsaturated" portions of the line be used "to investigate any potential piping system leaks".

8. Page 32, Groundwater Samples:

It is unclear from the text exactly which wells will be sampled for the full scan analysis. Please see comment #1, and revise the text as appropriate.

9. Appendix B, Page 3, Paragraph 3:

The heavily clogged, dirty condition of the IWTP line to the west and northwest of building 2662 should be evaluated as a potential source for the groundwater contamination detected adjacent to building 3380 and associated areas.

TECHNICAL MEMORANDUM:

No comments. The document met its intended purpose of providing Tier 1 with current (at time of issue) information about Site 36 needed to make decisions relevant to BRAC construction activities (e.g. AVGAS line removal). As indicated in comment 64 above, updated information and decisions on this portion of Site 36 must be provided in the appropriate forthcoming documents for Site 36 (e.g. SAP, removal documents, report).