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NAS PENSACOLA
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October 20, 1995

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U.S. Environmental Protection Agency
ATTN: **Mr. Jay Bassett**
345 Courtland Street, NE
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SUBJECT: CTO No. 0036
Final RI/FS Work Plan Sampling and Analysis Plan
Site 41, NAS Pensacola

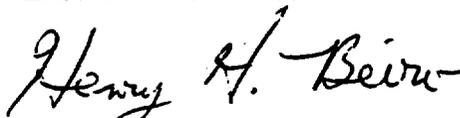
REFERENCE: Contract N62467-89-D-03 18

Dear **Mr. Bassett:**

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit three copies of the Final RI/FS Work Plan/Sampling and Analysis Plan for Site 41 at the Naval Air Station in Pensacola, Florida and the responses to comments. If you should have any questions or need any additional information regarding the work plan, please do not hesitate to call me.

Sincerely,

EnSafe/Allen & Hoshall


Henry H. Beiro
Task Order Manager

Enclosure

cc: Contracts File: CTO No. 0036
Project File: NAS Pensacola
SOUTHDEV: Ms. Kim Reavis/Code 0233K??
Bill Hill, SOUTHNAVFACENCOM - 2 copies
EnSafe/Allen & Hoshall file - 1 copy
EnSafe/Allen & Hoshall Pensacola - 1 copy
Roy Joyner, NAS Pensacola - 9 copies
Lynn Griffin, FDEP - 1 copy
John Lindsay, NOAA - 1 copy
John Mitchell, FDEP - 2 copies
Tom Moody, FDEP - Cover letter only

**JOHN MITCHELL — FDEP
RESPONSE TO COMMENTS
DRAFT FINAL RI/FS SAMPLING AND ANALYSIS PLAN, SITE 41
NAVAL AIR STATION PENSACOLA
COMMENTS DATED MARCH 8, 1995**

COMMENT 1:

Table 2-1 (Summary of Sources and Pathways)

Based upon the site map, we believe the following wetlands **need** to be added to the column under "Specific Wetland(s) Potentially Impacted" for **these certain** sites:

- a. Wetland W2 — Site 1, 5, 6, and 16
- b. Wetland 54 — Site 3
- c. Wetland 55 — Site 5
- d. Wetland 62 — Site 3
- e. Wetland 64 — Sites 9, 10, 29, 30, and 34

RESPONSE:

- a. *Agreed.*
- b. *Agreed.* However, impacts to Wetland 48 and 52 should be **determined** first before Wetland 54 is sampled.
- c. Wetland 55 is over 1 mile away **from** Site 5. This wetland is **not** considered **potentially** impacted by Site 5.
- d. *Agreed.* However, impacts to wetlands 48 and 52 should be **determined** first before Wetland 54 is sampled.
- e. *Agreed.*

COMMENT 2:

Document Sampling Location Figures

All figures throughout the document which denote the surf.. water **and** sediment sampling locations should include the location of **all monitoring** wells.

RESPONSE:

New figures will be generated which **show** the location of **all** nearby monitoring wells. Because of the density of monitoring wells on some figures, **not** all monitoring wells **can** be labeled.

COMMENT 3:

Figure 4-2 (Wetland 5 Sample Location)

We **recommend** an additional sediment sample be **taken** about 250 feet **downgradient** from the current **most** proposed sediment sample. **Also**, the industrial sewer line and manholes for Site 36 which are in the vicinity of Sites 27 and 30 should be shown on the figure. Also refer to comment #2.

RESPONSE:

The purpose of the **initial Phase IIA** sample is to determine whether contamination may be present at "hot spots". **These** sample locations were **chosen** by **E/A&H** personnel based on **historical** information about the **site**, the wetland in question, and a site **reconnaissance**. Depending on sample **results**, locations in addition to those shown on the **figures** may be sampled. In the case of Figure 4-2, additional sample locations may be collected, depending on sample **results** from wetlands **5A** and **5B**.

The industrial waste sewer line will be shown where it **extends** onto **Figure 4-2**. The manholes are not considered **sources** of contamination. **Please refer** to the *Draft Sampling and Analysis Plan for Site 36-Industrial Wastewater Treatment Sewer Line, Naval Air Station, Pensacola, Florida*. January 1995.

COMMENT 4:

Section 4.3.1 (wetland 6 Associated Sites **Historical Summary**)

Sites 27 and 30 should **also** be included as a site which may have **historically** or may currently impact the portion of Wetland 6 **north** of the confluence of Wetland 5. **Also**, since Site 12 is also considered for potential **affect**, shouldn't Site 26, which is close to Site 12, **also** be **included**.

RESPONSE:

This section is intended to be a **historical** summary of **sites** immediately associated with or adjacent to a particular wetland or wetland complex. A **historical summary** of Site 30 is described in the previous **section** as it pertains to Wetland 5. Discussing **Site 30** in detail as it pertains to Wetland 6 would lead to repetitive **information**. **Since** it is already **stated** in Table 4-1 which sites may have impacted particular wetlands, it is **not necessary** to go into **further** detail in the **text**.

Site 26 is not included **because** it is a UST site and will be addressed under the UST program.

COMMENT 5:

Section 4.4.1 (Site 1 **Historical Summary**)

The **second** paragraph should **also** indicate the northerly flow of groundwater flows **into** Bayou Grande.

RESPONSE:

This will be ~~mentioned~~ in the text.

COMMENT 6:

Figure 4-4 (wetland 1 Sampling Locations)

The extent of *the* boundaries for Sites 1 and 16 should be indicated **on the figure**. Also refer to **comment #2**.

RESPONSE:

The boundaries of Sites 1 and 16 and the location of **all** nearby **monitoring wells** will be indicated on **Figure 4-4**. Bear in mind that the exact boundaries of *Site 1* and *Site 4* are not known. The best estimates will be provided.

COMMENT 7:

Figure 4-5 (wetland 3 Sampling Locations)

The extent of the boundary of **Sites 1** should be indicated on the **figure**. *Also* refer to **comment #2**.

RESPONSE:

The boundaries of **Site 1** and the location of **all** nearby **monitoring wells** will be indicated on **Figure 4-5**.

COMMENT 8:

Figure 4-6 (wetland 4 Sample Locations)

Refer to **comment #2**.

RESPONSE:

The boundaries of **Site 1** and the location of **all** nearby **monitoring wells** **will** be indicated on **Figure 4-6**.

COMMENT 9:

Figure 4-7 (Wetland 15 Sample Locations)

The extent of the boundary of **Sites 1** should **be** indicated on *the figure*. Also refer to **comment #2**.

RESPONSE:

The boundaries of **Site 1** and the location of **all** nearby **monitoring wells** **will** be indicated on **Figure 4-7**.

COMMENT 10:

Figure 4-8 (wetland 16 Sampling Locations)

The extent of the boundary of Sites 1 should be indicated on the figure. Also refer to comment #2.

The proposed sediment sample location is not indicated on the figure. We suggest one near the beginning of east end of the channel leading to the bayou. Also, we suggest another surface water sample to be taken near the southeast portion of the wetland.

RESPONSE:

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-8. Three sediment samples will be placed on Figure 4-8.

COMMENT 11:

Figure 4-9 (wetland 17 Sampling Locations)

The extent of the boundary of Sites 1 should be indicated on the figure. Also refer to comment #2.

Based upon previous analytical results in this wetland, we suggest only one SW/SD sample is needed.

RESPONSE:

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-9. Two sediment samples and one surface water sample will be collected from this wetland and will be shown on Figure 4-9.

COMMENT 12:

Figure 4-10 (wetland 18 Sampling Locations)

The extent of the boundary of Sites 1 should be indicated on the figure. Also refer to comment #2.

RESPONSE:

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-8. Three sediment samples will be placed on Figure 4-10.

COMMENT 13:

Section 4.5.1 (OU10 Historical Summary)

On p. 4-53 the document states, related to Wetland 13, that "a bilge water spill reportedly occurred at this site. This spill, suspected to have occurred in FDEP UST program, separate

from Sites 32, 33, and 35." According to Figure 4-11, Wetland 13 is east of the Bilge Water Treatment Plant (BWTP). The wetland affected by the bilge water spill was immediately adjacent to the west of the BWTP. This was either Wetland 12 or east of Wetland 12. This error should be corrected.

Also, at previous meetings, we discussed the wetland affected by the bilge water spill and that it would be included in the Site 41 investigation. We had previously wanted it studied related to OU 10, but agreed to postpone the study until the Site 41 investigation. We still believe that this wetland and Wetland 13 should be evaluated under CERCLA due to there being in the immediate vicinity of OU 10.

RESPONSE:

The text on page 4-53 and the discrepancy with Figure 4-11 will be corrected. Wetland 13 will also be investigated because of its proximity to OU 10.

COMMENT 14:

Figure 4-11 (Wetlands 10 and 12 Sampling Locations)

As stated in comment #13, we believe Wetland 13 needs to be included for investigation. Also refer to comment #2.

RESPONSE:

Wetland 13 will be included in the investigation. One sediment sample and one surface water sample will be collected from this wetland.

COMMENT 15:

Figure 4-12 (wetland 63A Sampling Locations)

The figure should include the locations of Buildings 2662 and 3380. Also refer to Comment #2.

RESPONSE:

These buildings will be included. Site boundaries will be included to the most accurate extent possible.

COMMENT 16:

Figure 4-14 (wetland W1 Sampling Locations)

No proposed sediment sample locations are indicated on the figure, yet the legend gives the indication there are. This symbol should be removed from the figure to eliminate any confusion. We agree no further samples are needed in this wetland. Also refer to comment #2.

RESPONSE:

The legend depicting proposed **sediment** sample locations will be removed from **Figure 4-14**.

COMMENT 17:

Section 4.7.3. (Proposed Wetlands 52 and 48 Sample Locations) and Figure 4-16 (Wetlands 48 and 52 Sampling Locations)

We do not quite understand the **sampling** locations. Even though Wetland **48** appears to be a location of groundwater discharge and flows **into** Wetland 52A, **this specific area shown in the figure** does not appear to be downgradient from **any** sites. Site 3 is the **nearest** site and is northeast of the **sampling** locations. Groundwater flow at Site 3 is **to the south** and southeast, away **from** the designated **sampling** locations **in** Figure **4-16**. We are not opposed to **sampling** these locations, but we believe other more significant **areas** of the Wetland 52 system would be more appropriate.

After reviewing Figure 2-1 and Figure 4-20, we recommend **sampling also be performed** in the wetland areas hydrologically (**surface** water and groundwater) downgradient of Site 3 and Wetland 1A. **Specifically**, Wetlands 52, 52D, 52B, **62**, and the **eastern** portion of 52A as these have **more** potential of being affected by sites.

RESPONSE:

A field survey was performed to determine the best locations for sampling wetlands 48 and 52. It was determined that wetlands 48 and 52 have unique **drainage** patterns. Wetland 48 **begins** as a drainage culvert **from** the area of Site 3 and **continues east** until it crosses under Blue Angel Parkway.

COMMENT 18:

Figure 4-17 (Wetland 72 Sampling Locations)

We recommend that the most downgradient proposed **sediment** sample be at least 200 feet further downstream. **Also** refer to comment #2.

RESPONSE

Agreed.

COMMENT 19:

Figure 4-18 (Wetland 19A and 19B Sampling Locations) and Figure 4-19 (Wetland W2 sampling Locations)

We are unsure about **needing** a **surface** water and **sediment** sample in **the** upgradient portion of Wetland 19A. Wetland **19** appears to **drain** easterly toward Bayou Grande. We **also**, believe an additional **surface** water and **sediment** sample should be **performed** in Wetland W2 upgradient of its confluence with Wetland 1.

RESPONSE:

All of these wetlands are hydraulically contiguous. Samples will be collected in those areas shown for that reason.

COMMENT 20:

Section 4.9 (Site 4 Wetlands)

We do not recommend sampling of wetlands for Site 4 until Site 4 has been investigated and contamination found to be of a significant problem.

RESPONSE:

The Tier I partnering team has decided to continue the Site 41 investigation as planned.

COMMENT 21:

Section 4.12 (Control Wetlands 25, 32, and 33)

We are not opposed to using Wetlands 32 and 33 as reference locations. However, Wetland 25 poses some question due to its close vicinity to the first point of land to the east of Bayou Grande. The FDEP sediment group had a sampling location off this point which had elevated hits of metals, PAHs and PCBs (FDEP, 1994). We suggest the reference wetland be further west; possibly Wetlands 27A and 27B, or Wetlands 70A and 70B.

RESPONSE:

Wetlands 27A and 27B will be used instead of Wetland 25 as a reference wetland.

COMMENT 22:

Section 4.13.7 (Site 27)

This section indicated that Site 27 might be of concern for Wetland 6 which is 100 feet east of the site. We suggest that the closer Wetland 5A may be a location of contaminant migration from this site.

RESPONSE:

Wetland 5A will be added as a potential wetland of concern.

COMMENT 23:

Section 4.13.8 (Site 31)

We believe Wetland 5A is more likely to have been impacted from this site rather than Wetland 64.

RESPONSE:

Wetland 5A will replace Wetland 64 as the potential wetland of concern.

COMMENT 24:

Appendix D (Piezometer, Rain Gauge, and Staff Gauge Installation Procedures)

We also recommend tide staff gauges be installed in tidal estuarine wetlands, and these gauges correlated to a local tidal control gauging stations to measure any tidal affects on groundwater flow.

RESPONSE:

This has been done at other sites in the area of Bayou Grande, and there has been no influence noted from tidal effects on groundwater flow.

RI/FS Work Plan

COMMENT 1:

Our only comment concerns the title of Appendix D and Table D-1. Each should have the word "Other" preceding the word "Sites."

RESPONSE:

This change will be made.