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UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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

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NAS PENSACOLA
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DEC 23 1989

4WD-SISB

Mr. David Criswell
NAVFAC-ENGCOM
Southern Division
P.O. Box 10068
Code 11526
Charleston, S.C. 29411-0068

Re: EPA Region IV Ecological Technical Assistance Group (ETAG)
comments on the NAS Pensacola RI/FS Work Plan

Dear Mr. Criswell,

The following comments on the NAS Pensacola RI/FS Work Plan are from the EPA Region IV Ecological Technical Assistance Group (ETAG). ETAG is composed of EPA Regional expert ecologists and toxicologists along with members from the National Oceanic and Atmospheric Administration (NOAA) and the Fish and Wildlife Service. The latter two members along with the Florida Department of Natural Resources are NAS Pensacola's natural resource trustees for offsite contamination. Comments pertain to the field work methodology proposed for sites included in Group A, B and C of the RI/FS Work Plan.

Group A

Page 14-2, A biological sampling plan should be prepared and submitted to EPA for approval of station location and sampling methodology. Oversight of data collection and data interpretation will need to be performed by an EPA or U.S. Fish and Wildlife biologist.

Page 14-5, Surface water samples need to be collected from one (1) foot above the bottom. Sediment samples need to be collected by corer instead of a dredge in order not to disturb surface sediments. The top 10 cm. of the core should not be composited with the rest of the core. It should be collected and analyzed separately.

Page 14-7, The soil sampling plan needs to include areas determined to be in the surface water pathway to Bayou Grande. In addition to soil samples, nearshore and offshore sediment samples from Bayou Grand should be collected in duplicate. One set for chemical analysis and the other for biological toxicity of sediment elutriate.

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page 14-13, As stated previously a biota sampling plan should be proposed for Bayou Grande as well as the other ponds on the site. If sediment samples are found to be toxic with biological toxicity tests, a biotic index of benthic organisms will need to be assessed as an indicator of ecological damage.

Group B

Page 14-8, Locate stations for some of the sediment samples in areas carrying surface runoff to ponds or the bayou to determine potential pathways to surface water and sediment. Duplicate sediment samples should be collected nearshore to mid channel of Bayou Grande for chemical analysis and elutriate bioassay. The U.S. Fish and Wildlife Service and National Marine Fishery Service should be contacted for a determination of ecologically sensitive areas which may be impacted in Bayou Grande.

Group C

Page 14-11, What is the rationale for sampling dredged areas in Pensacola Bay? Prevailing currents in the bay may require relocating some of the proposed stations.

Page 14-16, Additional sediment samples can be collected for evaluating the benthic population of Pensacola Bay when samples are collected for chemical analysis.

Representatives from NOAA and Fish and Wildlife have requested a site visit to NAS Pensacola. EPA would like to arrange such a visit to coincide with a project managers meeting to discuss EPA comments on the RI/FS Work Plan. Please inform Ms. Dean of my staff at (404) 347-5059 when a site visit and project managers meeting can be arranged.

Sincerely yours,



for
H. Kirk Lucius, Chief
Site Investigation and Support Branch
Waste Management Division

cc: Eric Nuzie, FDER
Dwayne bay, NAS Pensacola
John Lindsay, NOAA