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U.S. DEPARTMENT OF
National Oceanic and Atmospheric Administration

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c/o USEPA Region IV
345 Courtland Street
Atlanta, Georgia 30365
404-347-5231
March 13, 1991

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NAS PENSACOLA
5090.3a

Mr. Joel Murphy
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr.
P.O. Box 10068
Charleston, S.C. 29411-0068
Code 18213

Dear Mr. Murphy:

I have reviewed Mr. G. C. Bradley's January 29, 1991 information package on Southern Division installations. Information on twenty-two (22) installations was received and reviewed. As per our discussion, additional installation packets will be forwarded by yourself for further NOAA consideration. Of the 22 installations, fifteen (15) have sites of potential concern to NOAA. Five (5) installations, listed at the end of the letter, are outside of NOAAs jurisdiction and no further communications are necessary on these.

Of the 15 installations of concern, several information packets were of insufficient detail to allow a determination of interest/no interest. NOAAs decision process requires sufficient detail on contaminant levels and surface water/ground water migration pathways to surface waters of concern to ascertain potential levels of threat. Some sites are of definite concern and they are identified below; installations or sites requiring additional detail are similarly identified.

Under CERCLA §104(b)(2), NOAA requests opportunity be extended to participate, when applicable, in:

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- ∞ site visits;
- ∞ kick-off meetings;
- ∞ RI/FS scoping meetings;
- ∞ meetings to discuss RI results and discussions of potential additional work phases;
- ∞ meetings on the remedial alternative selection, especially in the selection of clean-up criteria, and;
- ∞ Remedial design/remedial action meetings.

NOAAs requests opportunity to comment and/or review:

- ∞ draft RI/FS and field sampling and analysis work plans;
- ∞ draft remedial investigations/feasibility studies;
- ∞ draft baseline risk assessment (environmental risk assessments);
- ∞ Record of Decision;
- ∞ draft remedial design/remedial action plans, and;
- ∞ draft operation and maintenance plans.



7 NOAA requests two (2) copies of each document for review purposes. I expect that as information on specific sites increases, the majority of sites will be found to be of no further interest. At that time the RPM/EIC will be notified and the requirement to forward site documents will cease.

NOAA also requests to participate in negotiations/discussions on environmental restorations for those sites at which adequate restoration/rehabilitation is not possible through the application of a remedial alternative.

The above addresses all anticipated expectations for NOAAs participation. Additional requirements may become necessary, especially at some specific sites. For example, it is not uncommon for ecological assessments/wetlands assessments to take on a life of their own.

A final note: NOAA reserves its right to investigate and take action on any release or threatened release of oil or hazardous substances potentially causing injury to its trust resources, regardless of the initial conclusions which I may have drawn as discussed below. I recognize and greatly appreciate the good faith efforts extended by the Navy to cooperate with NOAA, but future information may require a reassessment of sites for which I concluded 'no further interest'.

Review of Installations by State

South Carolina

MCAS and Naval Hospital, Beaufort. The information provided suggests that not all of the 23 sites will be of interest to NOAA, but more detailed information is required before excluding any sites. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

MCRD, Parris Island. The information provided suggests that all 16 sites are of potential interest to NOAA. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

NWS, Charleston. The information provided suggests that not all of the 18 sites will be of interest to NOAA (eg. site 7), but more detailed information is required before excluding any sites. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

Navbase, Charleston. NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available for Site #2 (Lead Contamination Area), #7 (PCB Transformer Storage Area), and #14 (Chemical Disposal Area), in order to ascertain a level of concern. NOAA is interested in reviewing and commenting

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on investigations at #8 (Oil Sludge Pit). If not already undertaken, NOAA recommends sediment investigations in Shipyard Creek, as it was a repository or potential repository for past releases (eg Site #9, 11, 12, 20). The majority of sites at this installation are not recommended by the Navy for additional investigation. However, if concern at any of the no further action sites becomes warranted in the future, NOAA requests opportunity to review all site investigation work plans and/or additional site assessment information in order to ascertain an appropriate trustee agency response.

Florida

NAS/NFD Jacksonville. Forty (40) sites are identified. Solely on the basis of the site descriptions provided, thirteen sites clearly suggest no further interest to NOAA. These sites are: 1, 8, 10, 17, 19, 21, 22, 23, 29, 35, 36, 37, 38. On December 4, 1990, NOAA provided comment through EPA on Sites 26 and 27. The majority of the remaining sites will likely also be of no further interest, but NOAA requests opportunity to screen any sites requiring further action by the Navy.

NAS Pensacola. I have previously toured the facility, March 20, 1990 with Nancy Dean, EPA, Mike Brimm, USFWS, and Ed Keppner, NOAA/NMFS. Sites of concern to NOAA include site numbers 1, 2, 11, 30 (now in Batch 1), and sites 13, 14 and 21 (Batch number unknown).

NOAA has not received any documents since the draft RI/FS Work Plans in August 1989. We would appreciate being brought current and will notify via letter, Mr. Ted Campbell as per your suggestion.

NAS Cecil Field. NOAA has potential interest in the following sites: PSC sites 18 and 19 and RI/FS sites 1, 2, 3, 5, 7, 8, 10, 15, 16 and 17. Additional information pertaining to threats to important surface waters, such as Sal Taylor Creek, Rowell Creek and Yellow Water Creek are needed before any decisions can be made about no further interest. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

Naval Station Mayport. NOAA has interest in the following sites: 1, 2, 4, 5, 6, 8, 9, and 14. Sites 10, 11, 12, 13, 14 and 15 are of potential interest, especially if further investigations are undertaken. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

NAS-Key West. NOAA has interest in reviewing all 10 sites described in the summary document. Informational detail is insufficient to exclude any sites from interest. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

Naval Coastal Systems Center, Panama City. NOAA has interest in reviewing all 9 sites described in the summary document. Informational detail is insufficient to exclude any sites from interest. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

NAS Whiting Field, Milton. NOAA is primarily interested in contaminant migration to Clear Creek and Big Coldwater Creek. The information provided suggests that not all of the 18 sites will be of interest to NOAA, but more detailed information is required before excluding any sites. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

Georgia

Naval Submarine Base, Kings Bay. NOAA is interested in having opportunity to screen any sites requiring further action. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as they become available.

MCLB Albany. The Flint River is the primary water body of concern to NOAA. The river is home to threatened Gulf Coast striped bass subspecies. The site descriptions are too brief to permit an assessment of the potential threat any of those sites pose. NOAA will expect to review progress at each site until adequate information permits a decision of no further interest.

Alabama

OLF Barin, Foley. The information provided suggests sites 1, 2, 3, 4, 5, 6, are of interest to NOAA. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as they become available. Sites 7 and 9 are of no further interest based on the description of potential threat. Site 8 is of potential great interest to NOAA. Concentrations of dioxin in parts per billion are significant, however, additional information is required before NOAA can ascertain its level of involvement.

NCBC, Gulfport. The information provided suggests that not all of the sites (eg. sites 7 and 9) will be of interest to NOAA, but more detailed information is required before excluding any of the 9 sites. Therefore, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as they become available.

Louisiana

NAS New Orleans, New Orleans. The information provided suggests that not all of the 10 sites will be of interest to NOAA, but more detailed information is required before excluding most, if not all sites; with the exception of Sites 2, 5, and 7 which are of no further interest. Otherwise, NOAA requests opportunity to review site investigation work plans, and/or additional site assessment information as it becomes available.

NOAA has no jurisdictional interests in the following installations:

Naval Air Station Memphis, Millington, Tennessee

Naval Training Center, Orlando, Florida. ?

Naval Air Station, Meridian, Mississippi †

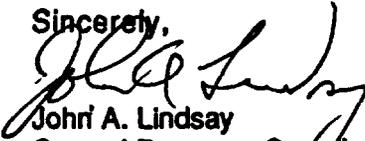
Naval Air Station, Dallas, Texas

Naval Weapons Industrial Reserve Plant, Dallas Texas

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I appreciate the effort that you, Mr. Bradley, and the Department of the Navy have expended to coordinate with NOAA. I also appreciate the open invitation to visit any of the installations of concern. At the appropriate time, NOAA will request site visits and we shall abide by the constraints of sufficient notice and personal information requirements. I look forward to working with you and the Navy.

Sincerely,



John A. Lindsay
Coastal Resource Coordinator

cc: B. Spagg (EPA Reg. IV)
M. Hartnett (EPA Reg. IV)
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