



Gardner, Executive Director

FLORIDA DEPARTMENT OF NATURAL RESOUR

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August 12, 1991

Commanding Officer
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Naval Facilities Engineering Command
Attn: Ms. Suzanne O. Sanborn, Code 18211
2155 Eagle Drive
P.O. Box 10068
Charleston, South Carolina 29411-0068

1821/1
1821/1
Add 8/12/91
New 8/13

Dear Ms. Sanborn,

We have reviewed the Draft Contamination Assessment/Remedial Activities Investigation Interim Data Report for Groups A - E, Naval Air Station, Pensacola. Our comments follow:

Site 1 (Sanitary Landfill)

contamination of the surface water and sediments were detected in Bayou Grande and the ponds adjacent to the site. Also, due to the color of the leachate in the ponds and at the base of the pond vegetation, iron and manganese may be in high quantities.

The proposed Phase II recommendations expand the number of sediment and surface water samples. However, the sampling is limited primarily to analysis for BNAs and a few TRPHs in Bayou Grande, and for metals and BNAs in the ponds. Why aren't all parameters being analyzed in all the adjacent water bodies? Are iron and manganese going to be tested for in the metal samplings and why weren't they tested for in the Phase I sampling?

In the habitat and biota survey, a variety of species were found in both the upland and submerged habitats. As the soils, sediments, and surface waters are contaminated, sampling of the flora and fauna should be performed to determine if there is any bioaccumulation in any of the species. Direct and indirect link to the human food chain can be attributed to many of the species found on and adjacent to the site.

Site 2 (Waterfront Sediments)

Detectable levels of contamination were found in the sediments. The additional sampling and analysis recommended for Phase II is commendable.

Benthic samples also need to be studied, considering the types of fauna observed reside in the sediments and serve as a food source

for larger animals. Some of these species are filter feeders, which would indicate a high potential for bioaccumulation of contaminants.

Site 11 (North Chevalier Disposal Area)
Site 30 (Buildings 649 and 755)

The contamination results of the surface water and sediment sampling for Site 30 shows direct correlation to Site 11 in the area of Bayou Grande. The surface water quality was below Class II standards. Phase II recommendations show more sampling of surface water and sediments in Bayou Grande, however, they do not extend further out in the Bayou than what was initially done in Phase I.

We would like to see more sampling performed further north in the southern arm of Bayou Grande. We would also like benthic sampling and analysis in Bayou Grande as the habitat has been contaminated. The Habitat and Biota survey results for Site 11 states "no indication of stressed biota was observed." However, the previous paragraph mentions a benthic coring was performed in the marsh revealing no biota. If the habitat was not stressed, than one would expect some living organisms within the marsh sediments. Sampling and analysis of the flora and fauna in the marsh and bayou should be performed to assess natural resource damage and possible bioaccumulation of contaminants within species. This also applies to the wetland adjacent to Buildings 649 and 755.

Contamination of Bayou Grande may also be related to other areas of the base south of where the creek leading from Buildings 649 and 755 joins the north south drainage ditch. We commend further sampling of the ditch south of this confluence as most surface water drains from the southwest end of Chevalier Field.

Site 12 (Scrap Bins)

Sediment contamination was found in the sediments of the stormwater drain. As contaminants may have progressed, off-site through this drainage system, further sampling of the complete drain system should be performed, as well as location of the outfall of that drainage system. We realize contamination within other areas of the storm drain may be from locations other than Site 12.

Site 13 (Magazine Point Rubble Disposal Area)

Sediment and surface water sampling needs to be analyzed for Pensacola Bay. Also a habitat/biota survey should be performed in the sediments and water adjacent to this site.

There does not appear to be significant contamination emanating from this site, but is traced back to the IWTP (Group 0). Yet review of the plan for Group 0 is dependent on the study at this

site. No surface water or sediment samples are addressed for this area of Pensacola Bay, yet shallow groundwater has been effected which may leach into the bay.

Site 14 (Dredge Spoil Fill Area)

Elevated levels of contamination was detected in all sediment samples, but were highest in samples 3 and 4 which are located in Pensacola Bay. Phase II increases the number of sediment samples at the southwest area of the site, but no additional samples are designated for the bay. We would like more samples taken in the bay between the outfalls from the site.

Also, the habitat biota survey at the site appears to have excluded the marine environment of the bay and should be performed. If further sampling shows contamination above safe limits, benthic sampling should be analyzed.

Site 15 (Pesticide Rinsate Disposal Area)

We perceive a limited concern at this site based on Phase I results. However groundwater and surface water flow is toward the golf course and the pond located at the NE corner of the Golf Course. Due to possible surface water run-off from the soils and possible surficial aquifer leachate occurring in the pond, surface water and sediment sampling should be performed in the pond. This pond has a tidal connection to Bayou Grande through a culvert at the north edge of the pond.

Site 24 (DDT Mixing Area)

Refer to General Comments.

Site 25 (Supply Department Outside Storage)

Refer to General Comments.

General Comments

As a natural resource trustee, the Florida Department of Natural Resources perceives the entire naval base as a site of potential contamination of our trust resources. Our trust resources include all of Bayou Grande, Pensacola Bay, and the tidal estuaries and sloughs in and around the base. We have jurisdiction over these submerged lands and the marine environment.

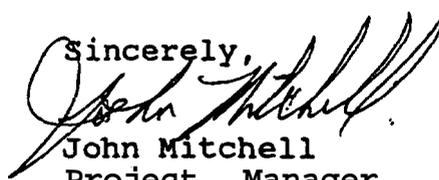
The Pensacola Naval Air Station is identified by U.S.E.P.A. as a site on the National Priorities List. We commend the Navy, and E. and E. for identifying all potential sources of contamination (PSC)

and proceeding to identify the extent of contamination for those specific PSC. However, all of these sites are located on a peninsula surrounded by our trust resources. All surface water run-off, drainage, and groundwater leachate flow from the base into our trust resource. Most of the above sites do not address the surface water flow from the PSC. The only ones addressing surface water are Sites 1, 11, and 30.

We believe sediment sampling and analysis needs to be performed in all areas of the water body surrounding the base. Also surface water flow needs to be addressed thoroughly at those sites not directly adjacent to a creek, bayou, or bay. All of the Phase I studies of the sites state contamination may be from ambient sources.

Thank you for the ability to comment. We anticipate a constructive and facilitated remediation of contamination at the base. If you have any questions, please call me at (904) 922-6067.

Sincerely,



John Mitchell
Project Manager, Office of
Marine Programs and Planning

cc: Ernie Barnett, FDNR
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