



U.S. DEPARTMENT OF
National Oceanic and Atmospheric Administration
Hazardous Materials Response Branch
7600 Sand Point Way N.E. - Bin C15700
Seattle, Washington 98115
September 11, 1991

N00204.AR.000263
NAS PENSACOLA
5090.3a

Ms. Suzanne Sanborn, Code 18211
Southern Division Naval Facilities Engineering Command
P.O. Box 10068
Charleston, South Carolina 29411-0068

Dear **Ms. Sanborn**:

Thank you for the opportunity to review and comment on the Contamination Assessment/ Remedial Activities Investigation, Investigation Work Plan - Group O, Sites 32, 33, and 35. Naval Air Station Pensacola, Pensacola, FL.

Comments

The soil gas survey will not locate contamination by toxic elements, semivolatile organic compounds, PCBs or pesticides, which may be found separately in soil and groundwater from organic compounds. Phase I soil and groundwater sampling should be performed in a systematic manner throughout the site unless current and reliable soil and groundwater data are available to determine locations of contamination.

The use of temporary wells did not provide reliable results in Phase I sampling of other sites. Unless changes are made in sampling and analysis procedures to address these problems, permanent wells should be installed for Phase I.

The assumption that additional data for Group O sites will be provided by sampling of Sites 13 and 30 is not supported by information provided for those sites. The recommendations for Phase II sampling included with the Interim Data Reports for those sites did not provide for delineation of contamination from Group O sites. Planned Bayou Grande Phase II surface water and sediment sampling for Site 30 was too limited. According to the Phase II Site 13 sampling recommendations in the Interim Data Reports, contamination from the Group O sites should be investigated as Group O sampling. Additional surface water and sediment samples should be collected at Bayou Grande and Pensacola Bay where surface water or groundwater from the sites discharge, as part of Group O sampling.

The Phase I analysis of samples should be more extensive than planned. At a minimum, analysis of all samples should be for all TAL substances, including mercury, and PCBs. Detection limits for metals, pesticides and PCBs should be at or below the ambient water quality criteria for the protection of aquatic organisms (AWQC) for surface water and groundwater samples and ER-L



concentrations (Long and Morgan, 1990)¹ for sediment samples, in order to provide meaningful results for evaluating the potential **risk** to aquatic organisms.

The effects of major storm events on surface water run-off should be considered when inspecting for **surface** drainage during the **Phase I** physical **reconnaissance**. All drainage pathways should be included in the sampling program for Group O as well as the portions of Bayou Grande and Pensacola Bay near the discharge points of **those** drainages.

A comprehensive surface water and sediment sampling program for Bayou Grande and Pensacola Bay should be considered as a separate effort **from** individual **site** sampling programs. A comprehensive program would provide **data** for evaluating individual sites and interrelationships between sites, and for locating contaminant **sources** not previously identified. This **type** of program is needed to conduct an ecological assessment for the **NAS** Pensacola site.

If **you** have any questions regarding these comments, please call me at **206-526-6404** or Waynon Johnson at 404-347-5231.

Sincerely,



Jay Field

cc: **Ron** Joyner, Naval Air Station Pensacola, Pensacola, FL

¹Long, E.R. and L.G. Morgan. 1990. The potential for biological effects of sediment-sorbed contaminants tested in the National Status and Trends Program. N O M Tech. Memo. NOS OMA 52. National Oceanic and Atmospheric Administration, Seattle, Washington. 175 pp. + appendices.