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FLORIDA DEPARTMENT OF NATURAL RESOURCES

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NAS PENSACOLA
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Dear Ms. Sanborn,

We recently received the Draft Contamination Assessment/Remedial Activities- Investigation Work Plans for the following site groupings at Naval Air Station, Pensacola:

GROUP	SITE NUMBER AND NAME
H	Site 8 - Rifle Range Disposal Area Site 22 - Refueler Repair Shop
I	Site 17 - Transformer Storage Yard Site 18 - PCB Spill Area Site 28 - Transformer Accident Area
L	Site 4 - Army Rubble Disposal Area Site 5 - Borrow Pit Site 6 - Fort Redoubt Rubble Disposal Area Site 16 - Brush Disposal Area
P	Site 38 - Building 71
Q	Site 39 - Oak Grove Campground

As N.A.S. Pensacola is on a peninsula bordered by our trust resources, the entire base is of concern due to its potential impact on these resources. Our comments concerning the above work plans are as follows:

Group H

Surface water drainage is not adequately addressed. Where are the storm water drains or ditches in relation to the sites? These drainage systems need to be analyzed for sediment and surface water contamination.

Group I

We assume these sites are being grouped due to the similarity of the potential contaminant. However, they are geographically separate. These sites should be addressed individually.

Group L

The plan states surface water runoff at Site 6 is negligible due to the porous sandy soils and the topography. This is likely true during light rainfall. However, heavy rainfalls would cause rapid movement of these sandy soils. Also, the porous nature of the soils would provide for rapid movement into the surficial groundwater.

Site 16 is adjacent to Bayou Grande with a drainage ditch passing through the site and flowing into the bayou. More surface water and sediment sampling is needed in the drainage ditch, especially near its outfall into the bayou. Also sediment and surface water sampling is needed in the bayou adjacent to the site, as surface water and ground water flow is toward it.

Surface water and sediment sampling should also be performed in the drainage ditches or storm water drains in or adjacent to Sites 4, 5, and 6.

Group P

The previous drainage system in the area of Building 71 discharged directly into Pensacola Bay prior to being diverted to the industrial waste treatment facility. Where was the previous outfall into the Bay? Sediment sampling should be performed in the area of that drainage outfall.

Also, the location of this site is adjacent to Site 2 (Waterfront Sediments). The results from Site 2 need to be correlated with Site 38.

Group Q

There is a lack of concern for surface waters and sediments in Pensacola Bay and Sherman Inlet which are only 700 feet south and west from the site. During heavy rainfall storm water may carry contaminated sediments to these water bodies. Any groundwater flow is likely toward the bay and inlet. Surface water or sediment sampling should be performed in the bay and inlet.

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General Comments

The phased approach of the remedial investigation appears to prolong the investigative process. If contamination above background levels is determined within the a site location, then further study will be performed laterally from the site. This seems to be a short-sighted strategy. Many of these sites have been in existence for a long history. The likelihood of off-site migration is therefore amplified. It is possible contamination would not be found on-site, yet could be found further from the site. Even though initial cost may be more to examine more parameters off-site, it would be less than the multi-phased technique which allows for possible redundancy and added costs.

A topographical survey will not be performed until the last phase of the plan. This phase will only be performed if problems are found in earlier stages. We believe the topography should be identified in the beginning to accurately address surface water drainage.

We also have a problem with only addressing site-specific biological resources (Section 5.2). Due to the likelihood of off-site migration of contaminants, biological resources need to be identified and later sampled beyond the site boundaries. Faunal species may not reside at a particular site, but use the resources at that site.

At those sites which are the least disturbed and most natural, the flora and fauna should be analyzed for possible uptake of contaminants should contaminants be found above ARAR. This should also be performed in the benthic communities adjacent to these sites.

Thank you for the ability to comment. If you have any questions, please call (904) 922-6067.

Sincerely,



John Mitchell
Project Manager, Office of
Marine Programs and Planning

cc: Ed Conklin, FDNR
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