



FLORIDA DEPARTMENT OF NATURAL RESOURCES

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November 12, 1991

Addressed
to the
Director

Commanding Officer
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Attn: Ms. Suzanne O. Sanborn, Code 18211
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N00204.AR.000306
NAS PENSACOLA
5090.3a

Re: Contamination Assessment/Remedial Activities Investigation
Work Plans

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:

Table with 2 columns: GROUP and SITE NUMBER AND NAME. Rows include: A Site 1 - Sanitary Landfill; B Site 11 - North Chevalier Disposal Area, Site 12 - Scrap Bins, Site 26 - Supply Department Outside Storage; C Site 2 - Waterfront Sediments, Site 13 - Magazine Point Rubble Disposal Area, Site 14 - Dredge Spoil Fill Area; D Site 15 - Pesticide Rinsate Disposal Area, Site 24 - DDT Mixing Area; E Site 30 - Buildings 649 and 755

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 A

### Section 14.3.1 (Phase III - Biota Sampling)

The plan should specify the type of analysis (bioassay; tissue analysis; etc.) . It only includes marine sampling and ignores terrestrial species.

## Group E

### Section 14.2 (Phase II - Characterization/Extent Delineation)

Page 14-13 - The plan states that Site 11 is probably of primary impact to this section of Bayou Grande. Why not focus surface water and sediment sampling in the bayou with this study plan rather than for the plan for Site 30.

Page 14-15 - Under Site 11, paragraph 2, Bayou Grande is referred to as Site 30, while it is actually Site 40.

Page 14-16 - To identify the impact to on-site and off-site components by contaminants, we need tissue sampling of biota in Phase II, not Phase III. Due to the length of time these sites have been present, there is a high probability of residual damage to biota.

### Section 14.2.2.1 (Surface Water/Sediment Sampling)

Page 14-40 - Surface water and sediment sampling should be performed more relative to Site 11, rather than Site 30, as this site has a more likelihood of primary impact.

Page 14-41 - The location of the drainage outfall from Site 12 needs to be shown on the Site 12 map, as well as the SW/SD sampling location, so we can better evaluate this proposal.

## Group C

### Section 14.2 (Characterization/Extent Delineation)

Page 14-14 - Under Sites 13 and 14, the objectives should characterize the flora, as well as the fauna, in the bay area adjacent to the site.

Page 14-15 - For Site 2, 13 and 14, to meet the objectives of determining "the presence, nature, magnitude, and extent of nearshore and on-site" contamination, biota sampling and analysis needs to be performed.

## Group D

No specific comments.

## Group E

### Section 14.2 (Characterization/Extent Delineation)

Page 14-10 - For Site 30, the objectives should characterize the flora, as well as the fauna, in Bayou Grande and the marsh area.

Page 14-11 - To meet the objectives of determining "the presence, nature, magnitude, and extent of nearshore and on-site" contamination, biota sampling and analysis needs to be performed.

## General Comments

As we stated in our previous letter commenting on study Groups H, I, L, P, and Q, the phased approach of the remedial investigations appears to prolong the investigative process. In this phased approach, if contamination above background levels is determined within 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.

Also, do to the long time frame in which many of these sites have been in existence, uptake of contaminants by the fauna and flora is likely to have occurred and is ongoing. Rather than postpone biological sampling and analysis until Phase III (based upon contaminants of concern determined from surface water and sediment analysis), sampling and analysis of yet to be determined species should be performed in Phase II.

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 which is a more pronounced source for off-site migration of contaminants in the soils than is the groundwater. During heavy rainfalls, rapid flowing surface water is more likely to transport contaminants or contaminated soil off-site.

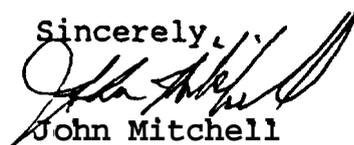
We also have a problem with only addressing site-specific biological resources (Section 5.2). Due to the likelihood of off-site migration of contaminants, biological resources need to be identified and later sampled beyond the site boundaries. Faunal species (marine and terrestrial) may not reside at 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 marine and terrestrial communities adjacent to these less disturbed areas.

We realize work plans have yet to be established for Site 40 (Bayou Grande), Site 41 (NASP Wetlands), and Site 42 (Pensacola Bay), as these areas were only recently established as actual sites of Potential Source of Contamination (PSC). In the work plans for these sites, our concerns for biota sampling and analysis can be addressed, however, due to the potential for current natural resource damage from the other sites, these concerns should be addressed now, rather than be postponed.

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

Sincerely,



John Mitchell  
Project Manager, Office of  
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cc: Ed Conklin, FDNR  
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