



# FLORIDA DEPARTMENT OF NATURAL RESOURCES

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3900 Commonwealth Boulevard  
Tallahassee, Florida 32399

June 19, 1992

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1851 405  
6/22/92

Allison Drew  
Remedial Project Manager  
DOD Remedial Section  
U.S. Environmental Protection Agency  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

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NAS PENSACOLA  
5090.3a

Subject: Naval Air Station Pensacola (NASP)  
Draft (May 1992) Contamination Assessment/Remedial  
Activities Investigation Naval Air Station, Pensacola,  
Data Summary and Preliminary Scoping for Ecological Risk  
Assessment Work Plans

Dear Ms. Drew:

We have reviewed the above referenced document and provide our comments.

Table 2-2 (Toxicological Benchmark Concentrations for Sediments) and Table 2-3 (Toxicological Benchmark Concentrations for Surface Water):

We are concerned with the limited number of contaminants being used for toxicological examination as outlined in these tables. Also, the contaminants considered in Table 2-2 are not completely considered in Table 2-3. Table 2-3 should also include lead, cadmium, nickel, and silver. Also, PCBs are not addressed at all.

A limited number of inorganics, Volatile Organic Compounds, and other contaminants are used in determining a risk quotient (RQ). We agree that the contaminants in these tables are of high priority. However, the full range of target analytes and compounds should be considered in establishing risk.

Section 3.3.3 (Preliminary Assessment of Ecological Risk) :

In the first paragraph of this section it is stated the impacted wetlands "appear to provide adequate habitat for species adapted to anthropogenic change." This is based upon the fact that many species (beaver, amphibians, reptiles, birds, etc.) live and survive in these physically impacted and contaminated areas.

The word "adequate" seems inappropriate and is suppositional wording. The existence of a species in an environment, does not necessarily make that habitat adequate. Species which

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are residing or foraging in these areas, may have diseases or illnesses which cannot be detected upon simple observation. The .contaminantsof concern may be having a carcinogenic and teratogenic affect on biota.

We appreciate the opportunity to be involved in the meetings and negotiations related to the remediation at NASP. Should you have any questions, please contact me at (904) 488-2960.

Sincerely,



/John W. Mitchell.  
Project Manager

JWM

cc: Suzanne Sanborn, USN  
Ron Joyner, USN  
Waynon Johnson, NOAA  
Jim Lee, DOI  
Lynn Griffin, FDER  
Pam McVety, FDNR