



DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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CHARLESTON S C 29411-0068

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COMMANDING OFFICER
THE SIGNER OF THIS LETTER
REFER TO

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1851/11

JUN 26 1992

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. John W. Mitchell
Project Manager
Florida Department of Natural Resources
Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399

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NAS PENSACOLA
5090.3a

Dear Mr. Mitchell:

Enclosed for your review are our responses to your comments on the following documents: Revised Generic **SMP**, Revised **PMP**, Revised **QAPP**, and Revised **HASP** prepared by Ecology and Environment, Inc., and the Draft Phase I Workplan for Group L (screening sites). The revised documents are to be finalized based on your concurrence with our responses and incorporation of your comments. The Draft/Final Phase I workplan for Group L is due 60 days after the receipt of our responses which is August 24, 1992.

Please contact Ms. Linda Martin, Code 1851, at (803) 743-0574, if you should have any questions regarding these documents.

Sincerely,

JAMES B. MALONE, JR., P.E.
MANAGER, INSTALLATION
RESTORATION, EAST SECTION

copy to:
NAS Pensacola (Mr. Ron Joyner)
FDER (Mr. Eric Nuzie)
EPA (Ms. Allison Drew)

**RESPONSES TO COMMENTS FROM
THE FLORIDA DEPARTMENT OF NATURAL RESOURCES (FDNR)
DRAFT GENERIC PROJECT DOCUMENTS,
NAVAL AIR STATION (NAS) PENSACOLA**

- Item 1. Site Management Plan, Contamination Assessment and Remedial Activities, Naval Air Station Pensacola
- Item 2. Project Management Plan, Contamination Assessment and Remedial Activities, Naval Air Station Pensacola
- Item 3. General Health and Safety Plan, Environmental Contamination Assessment, Naval Air Station Pensacola
- Item 4. Generic Quality Assurance Project Plan for Contamination Assessments and Remedial Activities, Naval Air Station Pensacola
- Item 5. Remedial Investigation/Feasibility Study Work Plan - Group 0, Naval Air Station Pensacola

GENERAL COMMENTS

Comment 1:

We recently received the draft final for the above-referenced plans (Items 1-5). In general, we concur with the plans. However, investigations at many of these sites have discovered contaminants which appear to be from ambient sources. The management plans should address ways to research or determine the source of these ambient contaminants at a specific site.

Response:

It is not the purpose of these generic documents to address the potential sources of ambient contamination at a specific site. This is a site-specific problem and should be addressed on a site by site basis, during the Phase II investigations, if it is deemed appropriate based on Phase I results.

SPECIFIC COMMENTS

Items 1 to 4

Comment 1:

Site 41 (NASP Wetlands) is not identified on the illustrations (NAS Pensacola Site Locations) in any of the above subject plans.

Response:

A figure showing the wetlands at NAS Pensacola (as mapped by the 1991 EPA survey) has been added to Items 1 and 2.

Item 4

Comment 2

In Chapter 6 (FIELD WORK AND SAMPLING PROCEDURES), no procedures are described for the "Habitat/Biota Survey." We suggest transects or cross sections be established to perform this survey.

Also, no methodologies are characterized for "Biota Sampling" should this sampling be necessary.

Response:

The habitat/biota surveys are designed to use walkover, non-invasive techniques. Given that all sites will not conform to the same techniques to accomplish the intended purpose of the surveys, standard procedures for conducting them were not included in the Generic Quality Assurance Project Plan. Initial reconnaissance of a given site generally determines the appropriate methods to use in these surveys, and transects and cross section traverses have been utilized as procedures on some of the sites investigated to date.

The need for formal biota sampling will be determined following a full evaluation of the chemical nature of contamination at a given site. As stated in all of the site work plans, when the need for this type of sampling is established, a separate biological sampling plan (including sampling methodologies) will be presented to all concerns involved for review.