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FLORIDA DEPARTMENT OF NATURAL RESOUI

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NAS PENSACOLA
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July 13, 1992

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn: Linda Martin, Code 18211
P.O. Box 10068
Charleston, South Carolina 29411-0068

Re: Contamination Assessment/Remedial Activities Investigation Work Plans - Naval Air Station, Pensacola

Dear Ms. Martin,

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
F	Site 9 - Navy Yard Disposal Area Site 10 - Commodores Pond Site 23 - Chevalier Field Pipe Leak Area Site 20 - Soil South of Building 3460 Site 34 - Solvent North of Building 3557
G	Site 25 - Radium Spill Area Site 27 - Radium Dial Shop Sewer
J	Site 3 - Crash Crew Training Area Site 19 - Fuel Farm Pipeline Leak Area
K	Site 7 - Fire Fighting School Site 20 - Pier Pipe Leak Area Site 21 - Sludge at Fuel Tanks Area
M	Site 31 - Soil North of Building 648
N	Site 36 - Industrial Waste Sewer

Our comments concerning the above work plans are as follows:

Group F

Section 14.2 (Phase II - Characterization/Extent Delineation)

On page 14-21, sediment sampling is included for only the stormwater drainage ditch at Site 34. However, a major drainage ditch flows though the middle of Site 23 for which no sampling is planned. A surface water/sediment (SW/SD) sample is being taken for background purposes in the ditch adjacent to Site 30. As another storm drainage ditch traverses the lengtn of Site 23, we would like SW/SD samples performed and analyzed for all parameters in the drainage ditch at this site.

This ditch is a main source for surface runoff and surficial groundwater transmission. Surficial groundwater contamination has been discovered in this area from remedial investigation activities for Group N (Site 36).

Group G

Section 3.1 (Site 25 - Radium Spill Area)

We find the last paragraph of page 3-1 confusing. It states:

> "A fenced storage area adjacent to Building 780 has been used for drum storage since the 1970s (NEESA 1983). It is not known how many drums are currently being stored in this area or the procedures being used for the disposal of radioactive waste."

This is written in the present tense. Is radioactive waste still being generated, stored in drums on site, and disposed of? We thought this activity had been discontinued. Also, if this is a current operation, why are the disposal procedures unknown?

Group J

Section 14.2.3.1 (Surface Water and Sediment Sampling)

A SW/SD sample is being performed 500 feet downstream from the southern outfall of the southern storm drain at Site 3. We would also like a SW/SD sample taken 500 feet downstream from the northern outfall of the northern storm drain.

Section 18.4 (Risk Characterization)

What is the Integrated Risk Information System (IRIS)? It is not mentioned nor defined in the document.

Also, determining risk from a baseline risk assessment for human health is appropriate. However, in determining other environmental risks, an ecological risk assessment must be performed based upon USEPA guidelines.

Group K
Group M

No specific comments.

Group N

Due to the potential for ambient sources of contamination and the wide areal range of various contaminants, an assumption is made that the pollution is not caused by pipe leakage. This assumption is not adequate without actual testing of the pipeline. There could be leakage through cracked pipes or joints. This system has been in place for several years without any thorough analysis of its credibility. As there are various sites along this industrial sewer line which have exorbitantly high contaminant results, these locations would be likely areas for examining the pipe for leaks.

Besides lead, cadmium, and chromium, two other metals (copper and zinc) resulted in high contaminant levels in soil and surficial groundwater. The levels for copper and zinc were below the Florida Drinking Water Standards. However, they, along with lead, cadmium, and chromium, were well above the Florida Surface Water Standards (FSWS) for aquatic and marine life.

General Comments

1) The NAS Pensacola shallow groundwater leaches into the surface water streams, wetlands, bay and bayou in and around the air station. Contaminated surficial groundwater which migrates into surface water bodies should meet FSWS for marine or fresh water.

2) The storm drainage system has the likelihood of containing ambient contaminants other than what exists at an adjacent Potential Source of Contamination (PSC) site. Many areas of the base, which are not identified as a PSC, are likely sources for various pollutants, and have stormwater runoff into the storm drainage system. This system may be a PSC alone. Since some areas of these drainage ditches have elevated levels of contamination some distance from known PSCs, the Navy may want to consider making the storm drain system an operable unit.

Thank you for the ability to comment. If you have any questions, please call (904) 488-5474.

Sincerely,

John Mitchell
Project Manager
Office of Policy and Planning

cc: Pamela McVety, FDNR
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