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FLORIDA DEPARTMENT OF NATURAL RESOURCES

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April 22, 1993

Commanding Officer
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Attn: Ms. Linda Martin, Code 18211
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N00204.AR.000537
NAS PENSACOLA
5090.3a

Re: Naval Air Station Pensacola, National Priority List Site

1. Draft Remedial Investigation/Feasibility Study, Comprehensive Sampling and Analysis Plan for Naval Air Station Pensacola
2. Draft and Draft Final Comprehensive Long-Term Environmental Action Sampling and Analysis Plans for Sites 1, 2, 11, 25, 27, 30, 38, and 39

Dear Ms. Martin,

We recently reviewed the above referenced documents and offer the following comments:

RI/FS Comprehensive **Sampling** and Analysis Plan (SAP) for NAS Pensacola

In general the SAP for NAS Pensacola will provide the needed information for delineating contamination at the base, and provide information to analyze paths of contamination from the multiple sites. We do have some specific concerns related to sections of the SAP.

1. Section 1.0 (Introduction)

The second paragraph on page 1-1 states, "The analytical tasks will be performed by a USEPA Contract Laboratory (CLP) approved laboratory." Many of the Florida Surface Water Quality Standards and Ambient Water Quality Standards for some contaminants of concern are well below the CLP detection limits. This is also true for the "To Be Considered (TBC)" ER L and ER M values for sediments suggested by the National Oceanic and Atmospheric Administration (NOAA) (Long and Morgan, 1991). We suggest the detection limits be lowered to adequately address these standards and TBC values.

2. Section 2.2 (General Sampling Requirements)

On page 2-2, the next to last bullet declares, "After collection, samples believed to be highly contaminated will be separated from the samples believed to contain trace amounts of contamination." We take issue with the word "believed."

This is separating samples based upon an assumption. As most sampling will not be composited, this separation is not needed. Only after the analysis of the sample as been performed can one appraise the relationship of one sample to another.

3. Section 8.1.3 (Hydric Soils)

The last sentence of the second paragraph of this section states, "Only when a hydric soil supports hydrophytic vegetation and the area has indications of wetland hydrology may the soil be classified as a wetland soil." In general we would agree with this determination. However, the soils may be so highly contaminated that they will not support vegetation. To determine if it is a wetland soil should be based on the soils and the wetland hydrology. The vegetation would be an additional indicator.

4. Section 10.2 (Laboratory Analysis)

Refer to comment #1 concerning detection limits.

SAPs for Sites 1, 2, 11, 25, 27, 30, 38, and 39

The overall comprehensiveness of the *SAP* for these specific sites should provide adequate analysis for determining whether contamination exists and what impact may be occurring. The only specific comments concern the *SAP* for Sites 2, 27, 30, and 38.

Site 2 (Waterfront Sediments)

1. Section 4.5.1 (Surface Water Sampling)

The current Surface Water Sampling/Water Quality Stations (WQ) are adequate for addressing the eastern half of the site. However, the initial draft *SAP* had no WQ proposed for the western half of the site. The draft final *SAP* shows the westernmost WQ delineated in the first draft *SAP* as being further west. We agree with this location. However, we believe an additional nearshore WQ should be performed near

the westernmost part of the site.

2. Section 4.5.2 (Sediment Sampling)

As previously stated in our comments concerning the RI/FS Work Plan for Site 42 - Pensacola Bay, we believe the sediment sampling transects should be lengthened due to the size of the bay, and the unknown hydrogeology. Also, the size of the bay allows for more impact from the hydrography, especially during storm events. Sediment displacement may have extended beyond the immediate nearshore environment proposed for study.

The SAP proposes sampling at 100 foot intervals from 0 - 300 feet. We suggest increasing the transect to 700 feet from the shoreline. To eliminate the added cost for increased sampling needed at 100-foot intervals, we suggest sampling be done at 0, 100, 250, 400, 550, and 700 feet. This only increase the number of samples by one for each transect.

Site 27 (Radium Dial Shop)

In the *Contamination Assessment Remedial Activities Investigation Work Plan - Group G (Sites 25 and 27) - December, 1992* submitted by Ecology and Environment, Inc., sediment samples were to be taken at the site of the sewer manholes K-6 and N-4. In the current SAP submitted by EnSafe/Allen & Hoshall, these sampling events have been eliminated. Due to the possibility of surface drainage into these areas, we believe these sediment samples still need to be performed.

Site 30 [and 31) (Buildings 649, 755 [and 648])

1. Section 2.1 (Site Description)

The last paragraph of this section mentions numerous outfalls which intersect Wetland 6. During a previous site visit, we also noticed several outfalls which intersected Wetland 5B as it runs its course.

2. Section 4.0 (Field Sampling Plan - sediment Samples)

Page nine discusses sediment sampling, and Figure 4-1 denotes the location for these samples. We also believe additional soil/sediment samples are needed in the flood plain portion of

Wetland 5, as during heavy rainfall, the creek overflows it's banks. These samples should be performed at the site of any outfalls into Wetland 5B, and on alternate banks.

3. Section 4.0 (Field Sampling Plan) and Section 5.2 (Laboratory Analysis)

Section 4.0 mentions some analysis will include non-Contract Lab Protocols (CLP). We agree this is necessary for some of the surface water and sediment analysis of particular constituents. However, Section 5.2 states analysis will be conducted in accordance with the **RI/FS** Comprehensive **SAP** which only mentions analysis by standard CLP.

We agree with the determination for analysis in Section 4.0. Also refer to comment #1 for the **RI/FS** Comprehensive **SAP**.

Site 38 (Building 71)

1. Section 2.1 (Background Description)

The next to last paragraph on Page 3 discusses the interconnected drain system underneath the flooring of Building 71, and of a drainage system east of the building with an unknown pathway or connection. These drainage systems, with there reportedly known and unknown connections, need to be further researched to determine there actual connections and pathways.

2. Section 3.1 (Contaminant Source Survey)

This section states the survey will identify, "The location of previous and current underground and overhead piping and utilities." As stated in the previous comment, the connections/interconnections and pathways of these pipes should be determined. Also, sediment sampling and analysis should be performed in any underground and surface drains.

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Thank you for the ability to comment. If you have any questions,
please call (904) 488-7454.

Sincerely,



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