



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

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September 16, 1993

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NAS PENSACOLA  
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Virginia B. Wetherell  
Secretary

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

Re: Naval Air Station Pensacola, National Priority List Site

1. Draft *Remedial Investigation Report, Operable Unit 10*
2. Draft *Feasibility Study, Operable Unit 10*
3. Sampling and Analysis Plan Addendums - Sites 30 and 38

Dear Ms. Martin,

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

1. Draft RI Report, OU 10

The report indicates groundwater contamination beneath the site. Surface water and sediment contamination for pesticides and metals was found above water quality standards and sediment guidance values in the wetland adjacent to the Bilge Water Treatment Plant, and in the southern drainage ditch.

The wetland area shows definite impact from a 3,000 gallon waste oil spill in 1992 from the bilge plant. The reasons for the high pesticide content in the sediments and surface water of the ditch is unknown. The assumption is made that the pesticide contamination is a cumulative effect of past use for insect control. However, the values found are at levels which would be injurious to biota and will bioaccumulate up the food chain.

The potential risks from the contaminants discovered is limited for human contact due to the restricted and industrial nature of the area. However, the impacts to the wetlands place terrestrial and aquatic natural resources at high risk for injury. Further study of this wetland is needed related to bio-diversity, toxicity, and bio-accumulation analysis.

Section 10.9 (Preliminary Remediation Goals - PRGs) states, "no preliminary remediation goals were established for surface water or sediment because neither medium was shown to pose a significant

risk/hazard under a commercial/industrial exposure scenario." This does not take into account the ecological risks and hazards posed in the area of the wetland and southern drainage ditch. Due to the ecological risk evident within the wetland, preliminary PRGs are needed for this scenario.

Also, the dredge spoil area at the north end of Magazine Point (Site 13) indicated levels of contamination for sediments above NOM sediment guideline values. This sediment was deposited from dredging an area of Bayou Grande adjacent to the station's yacht basin and at the channel into the bayou from Pensacola Bay. The reason for these high pollution values in the dredge spoil may be related to other sites at NAS Pensacola. The current study of this dredge spoil should be used in correlation with the investigation of Bayou Grande as it relates to other potential sources of contamination.

## 2. Draft **FS**

The feasibility study provides alternatives for remediation of contaminated soils and groundwater at OU 10. However, it does not address the imminent risks posed by the contaminated sediment and surface water in the wetland and southern drainage ditch. It leaves the wetland area to be further investigated and remediated under the plans for Site 41 (NASP Wetlands).

As stated in our comments for the RI Report, the level of contamination within these wetlands and the southern drainage ditch pose a potentially high risk of injury to terrestrial and aquatic biota. Due to the analysis already performed, we recommend that remedial alternatives for this wetland be included in the feasibility study. Also, as mentioned above, further analysis of potential impacts to biota needs to be performed.

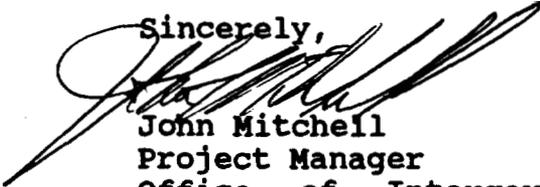
## 3. **SAP Addendums**

We have no comments on the addendums at this time.

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

Sincerely,



John Mitchell  
Project Manager  
Office of Intergovernmental  
Programs

cc: Pat Kingcade, FDEP  
Eric Nuzie, FDEP  
Waynon Johnson, NOM  
Jim Lee, DOI  
Ron Joyner, USN  
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