

32501.003  
16.01.03.0014

N00204.AR.000682  
NAS PENSACOLA  
5090.3a

National Oceanic and Atmospheric Administration  
Hazardous Materials Division  
c/o The Institute of Wildlife & Environmental Toxicology  
1 TIWET Drive  
Pendleton, SC 29670  
803-646-2335

14 March, 1994

Commanding Officer  
Code 1851  
SOUTHNAVFACENGCOM  
PO Box 190010  
North Charleston SC 29419-9010

Attention: Mr. Bill Hill

Dear Mr. Hill:

Review of the subject documents for Naval Air Station Pensacola, Escambia County, Pensacola, Florida was conducted by technical representatives of the Natural Resource Trustee for the National Oceanic and Atmospheric Administration (NOAA), U.S. Department of Commerce. The following comments are offered for your consideration.

**Documents Reviewed:**

1. *Draft Final Sampling and Analysis Plan for Site 3, Crash Crew Training Area, Naval Air Station, Pensacola, Florida. February 1994.*
2. *Draft Final Sampling and Analysis Plan for Site 9, Navy Yard Disposal Area, Naval Air Station, Pensacola, Florida. February 1994.*
3. *Draft Final Sampling and Analysis Plan for Site 10, Commodore's Pond, Naval Air Station, Pensacola, Florida. February 1994.*
4. *Draft Final Sampling and Analysis Plan for Site 14, Dredge Spoil Fill Area, Naval Air Station, Pensacola, Florida. February 1994.*
5. *Draft Final Sampling and Analysis Plan for Site 29, Soil South of Building 3460, Naval Air Station, Pensacola, Florida. February 1994.*
6. *Draft Final Sampling and Analysis Plan for Site 34, Solvent North of Building 3557, Naval Air Station, Pensacola, Florida. February 1994.*

**Comments:**

The National Oceanic and Atmospheric Administration (**NOAA**) is authorized under the provisions of Section 107 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Subpart G of the National Contingency Plan (NCP) to protect natural resources

under its jurisdiction against the injurious effects of hazardous substances. These comments are provided so that remediation decisions made **will** be protective of trust resources that **are** threatened or adversely affected by this site, or could be affected in the **future**.

As stated in the Sampling and Analysis Plan for Site 3, "Investigative work will be completed through **a** three-phased approach consisting of soil borings, temporary monitoring wells, permanent monitoring wells, and collection of soil, groundwater and sediment samples for target analyte list/target compound list (TAL/TCL) using CLP protocol (etc). Phase I activities will identify the presence or absence of contaminants at the site. Preliminary remedial goals (PRGs) will be established following evaluation of Phase I data for identified contaminants of concern. Further assessment activities **will** depend on whether soil, groundwater, and sediment samples exceed the applicable PRGs. A technical memorandum summarizing the findings of the first phase of the investigation presenting PRGs and outlining additional work will be prepared following receipt and evaluation of the analytical data."

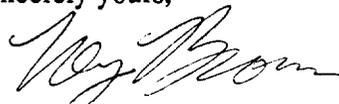
"Phase II of the investigation will be implemented for delineation of plume/soil contamination (contaminants of concern above the PRGs) through installation of additional temporary monitoring wells/soil borings. A technical memorandum will summarize the findings of the Phase II plume delineation and recommend location for permanent monitoring wells. Phase III permanent monitoring wells (and soil borings, if required) will replace strategically located temporary monitoring wells and be used to confirm contamination delineation and risk assessment."

The three-phased approach partially described above seems to be **an** appropriate way to address contamination for the reviewed sites as well as the other sites on the base. Overall it should be noted that risk, ecological or otherwise, should only be determined after all stages of assessment have occurred. It is premature to make any statements or determinations about ecological risk after only preliminary investigations unless those are the only investigations to be done for a particular site.

It has been stated in comments on these reports that there is no acceptable method for the analysis of hexavalent chromium. This is not true. EPA Analytical Methods 7195, 7196, 7197, and 7198 are appropriate methods for determining levels **of** hexavalent chromium in soils if the soils are treated with an acid wash and analyzed accordingly. The EPA approved methods for extraction should be used. Although full digestion procedures are normal for metals analyses for soils, treating the soils in the described manner can **be** used to understand the fraction that is most likely to be bioavailable. Where appropriate, hexavalent chromium analyses should be performed.

Thank you for providing NOAA the opportunity to comment on this site **and** for keeping me apprised of ongoing activities. I will be happy to discuss any questions or comments pertaining to this review that you may have. My telephone number is (803) 646-2335.

Sincerely yours,



Trey Brown  
Federal Facilities Coastal Resource Coordinator  
NOAA, Region IV

cc: Craig Brown, Remedial Project Manager, EPA