



Lawton Chiles  
Governor

# Florida Department of Environmental Protec

Marjory Stoneman Douglas  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

March 16, 1994

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NAS PENSACOLA  
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Virginia B. Wetherell  
Secretary

Mr. Bill Hill  
Code 18211  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Re: Naval Air Station Pensacola, National Priority List Site,  
Draft *Remedial Investigation Report, Site 1*

Dear Mr. Hill,

We have reviewed the above referenced document and provide the following comments.

1. Section 7.1.2 (Summary and Conclusions) states that (in soils) "concentrations of VOCs, semivolatiles, and PCBs, while not detected in perimeter or background samples, were reported for interior soil samples." Three samples, 01S7101 (NW perimeter) and 01S7201 (NE perimeter) had high levels of PCB contamination, 310 pbb and 130 pbb respectively. These samples are topographically near surface water pathways, the North Pond and Bayou Grande Pond. Also, sampling location 01S7201, which is near the Bayou Grande Pond, also had metal and pesticide contamination. Sampling location 01SI3501 which is near the Beaver Pond also had high pesticide levels.

In Section 9.2.2 (Surface Water Transport), it mentions a dry stream in the north portion of the site which leads to Bayou Grande Pond. This stream provides a soil migration pathway during storm events. The level of contamination is many times above sediment guidelines.

2. The results of groundwater analysis indicates contamination above MCLs in several areas of the surficial and intermediate aquifer, but no specific plume exists. MCLs were also exceeded for some metals in the referenced background wells. The document indicates that results cannot specifically determine that the contamination is directly related to the landfill. Whatever the case, the fact that the MCLs are exceeded for several constituents indicates some source of contamination. The inorganic contamination in the background

wells indicates a possible problem, and these wells may not be a good reference source.

3. The RI also indicates that during sampling of the groundwater wells that turbidity was evident in the recently installed wells, yet none in the older Geraghty and Miller wells. This leads to questions of purging techniques, well installation, or the type/size of screen used. This problem should be resolved.
4. We believe that those wells adjacent or near a surface water body or wetland should be evaluated based on Florida Surface Water Quality Standards (FSWQS). Many of these wells indicated contamination of one or more metal 2X or more above standards. Please refer to the attached Table 1. Also, migration of these metals could also impact sediments in the adjacent wetlands and water bodies above sediment guidelines.
5. Section 10.2.2 (Contaminants of Concern) and Section 11.1.4 (Conclusions and Recommendations) indicate ecological, surface water, and sediment issues will not be addressed until the investigation of Site 41 (NASP Wetlands). Site 40 (Bayou Grande) also needs to be referenced in this documentation.

We believe investigation of wetlands, Bayou Grande, the North Pond, Bayou Grande Pond and the Beaver Pond adjacent to this site should be included in the further investigation of Site 1. As discussed in our meeting in February at the USEPA office in Atlanta, when contamination is discovered at a particular upland site and has likely migrated into the wetlands or bayou, then the investigation of the wetlands and bayou in the area of the particular site will be incorporated. This is accentuated by the statement in Section 9.2.3 (Groundwater Transport): "Based on information, contaminants leaching to shallow groundwater from the landfills central portion potentially have migrated across the sites full northwestern, northern, and northeastern extends to Bayou Grande during the approximately 20 year period since the landfill was closed."

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Thank you for the ability to comment. If you have any questions,  
please call (904) 488-0784.

Sincerely,



John Mitchell  
Natural Resource Trustee  
Project Manager  
Office of Intergovernmental  
Programs

cc: Pat Kingcade, FDEP  
Eric Nuzie, FDEP  
Waynon Johnson, NOAA  
Jim Lee, DOI  
Ron Joyner, USN  
Allison Drew, EPA  
Henry Beiro, E/AH

TABLE 1

Metals at least 2X above FSWQS in Groundwater Wells adjacent to or near Bayou Grande, Bayou Grande Pond, North Pond, Beaver Pond, and Wetlands

WELL	METAL (S)	RESULT µg/L	FSWQS CLASS III µg/L
GM03	Copper	10.1	2.9
	Lead	74.1	5.6
GM39	Copper	15.4	2.9
	Iron	79800	300
	Lead	11.2 J	5.6
	Mercury	0.79 U	0.025
GM41	Copper	7.4	2.9
	Mercury	0.26	0.025
GM42	Copper	10.6	2.9
	Iron	52200	300
	Mercury	0.25	0.025
01GS57	Aluminum	333000	1500
	Arsenic	400 UJ	50
	Beryllium	5.2	0.13
	Copper	142	2.9
	Iron	200000	300
	Lead	35.2 J	5.6
	Mercury	1.3	0.025
	Nickel	158 J	8.3
Selenium	300	71	
01GI35	Copper	27.6	2.9
	Lead	41.8 J	5.6
	Nickel	21.0	8.3
01GI36	Copper	32.8	2.9
	Nickel	219.0	8.3
01GI43	Copper	24.4	2.9
	Lead	22.4 J	5.6
	Mercury	0.28	0.025
	Nickel	18.0	8.3
01GI44	Copper	71.2	2.9
	Lead	38.4	5.6
	Mercury	0.48	0.025
	Nickel	59.2	8.3
01GI46	Copper	11.1	2.9
01GI48	Copper	24.8	2.9
	Mercury	0.4	0.025
	Nickel	19.2	8.3