



32501.012
16.01.12.0013

**U.S. DEPARTMENT
National Oceanic and Atmospheric Administration**

National Ocean Service
Office of Ocean Resources Conservation and Assessment
Hazardous Materials Response and Assessment Division
Coastal Resources Coordination Branch

1 TIWET Dr.
Pendleton SC 29670
803-646-2335
803-646-2277 (fax)
tbrown@hazmat.noaa.gov (internet id)

N00204.AR.000721
NAS PENSACOLA
5090.3a

24 May, 1994

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

Attention: Mr. Bill Hill

Dear Mr. Hill:

Review of the subject document 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 Sampling and Analysis Plan for Site 36, Industrial Wastewater Treatment Plant Sewer Line, Chevalier Field Area, Naval Air Station Pensacola, May 1994.*
2. *Draft Sampling and Analysis Plan for Site 26, Supply Department Outside Storage, Naval Air Station Pensacola, May 1994.*
3. *Draft Sampling and Analysis Plan for Site 12, Scrap Bins, Naval Air Station Pensacola, May 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 these sites, "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."

The 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.

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,


Trev Brown

Federal Facilities Coastal Resource Coordinator
NOAA, Region IV

cc: Craig Brown, Remedial Project Manager, EPA