



# Department of Environmental Protection

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September 8, 1994

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NAS PENSACOLA  
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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,  
*Final Sampling and Analysis Plans*, Sites 3, 9, 10, 14, 29, and  
34

Dear Mr. Hill,

We have reviewed the above referenced documents and again provide the same comments we submitted previously concerning Sites 14 and 34. Our response to your previous comments on these sites have yet to be addressed, nor have you provided response comments to our response of March 1, on the Draft Final SAPs for these sites.

Site 14 (Dredge Spoil Fill Area)

In your response to our previous comments of November 17, 1993, you indicated the statement, "Because this area of land was created by dredge spoils material from the bay, it is considered state owned land and not Navy property," would be deleted from the document until ownership is determined. This statement continues to be included in the document in Section 2.2 (Site History) without any statement related to research or approval of ownership.

It is true that dredge spoil from the channel leading into Pensacola Bay through the inlet, and the Intracoastal Waterway are state owned lands. However, the dredge spoil placed on site from the turning basin and the inlet to the turning basin may not be state owned land. As stated in our original comments of November 17, 1993, historically, the state has deeded some submerged lands adjacent to federal facilities to the United States of America. Much of the dredged spoil came from submerged land which may have been deeded and conveyed to the Navy by the State of Florida. A thorough search of state land records needs to be made to determine actual ownership.

Also, we have additional comments which came to mind based

upon our reevaluation of a previous visit to Site 14. The basins within the dredge spoil area appear to always contain water, and wading birds have been observed feeding within these basins. Two Surface water and sediment samples should be performed and analyzed in each of these basins to determine whether potential affects to biota may occur.

In addition, we recommend a change in the sediment sampling methodology proposed. The currently proposed sediment samples in Pensacola Bay adjacent to the site call for a single grab sample with a Ponar dredge. This will only analyze a single point which may or may not be relevant. We suggest taking five grab samples from within a 25-foot x 25-foot area and compositing the samples for analysis. We realize that this might cause dilution of the contamination at one sampling point, however, if only one point in five is contaminated, it poses little risk overall. Preferably, each sample would be discrete, as in most terrestrial soil sampling which is performed on a grid every few feet. However, to decrease the cost of discrete analysis, we suggest the composite sample. This may not be part of the Standard Operating Procedure (SOP) for Region IV, but would provide a better indication than just a single point sample. If this sediment sampling methodology is not acceptable, we suggest replicate samples be taken for comparison with the proposed sediment sample.

Site 34 (Solvent North of Building 3557)

In this SAP and the Final Draft SAP, sediment sampling which was proposed in the original draft has been eliminated from the investigation. In your response to our comments of November 17, 1993, you state, "if it appears that the drainage ditch north of the site is a significant migration pathway (based on Phase I sampling results), sediment samples will be collected during subsequent field work."

We again indicate that the SAP for this site indicates that the drainage ditch is a likely pathway. In Section 2.2 (Site History), it states, "The unpaved drainage ditch in the tank area [which discharges to Wetland 6] is suspected of carrying contamination off-site and is presumed to be connected to the paved drainage ditch west of Chevalier Field." This down-gradient paved ditch flows into Bayou Grande. The release of 45,000 gallons of solvent detergent from the pipe leak would have likely migrated to the adjacent drainage area in question. Sediment sampling and analysis should remain as

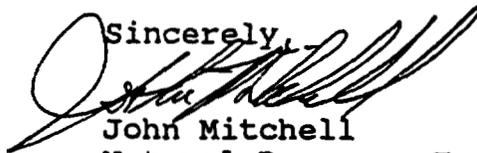
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part of the Phase I sampling.

We have no additional comments related to the Final SAPs for Sites 3, 9, 10, and 29.

Thank you for the ability to comment. If you have any questions, please call (904) 487-2231.

Sincerely,



John Mitchell  
Natural Resource Trustee  
Project Manager, Office of  
Intergovernmental Programs

cc: Pat Kingcade, FDEP  
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