



# EnSafe / Allen & Hoshall

a joint venture for professional services

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NAS PENSACOLA  
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October 14, 1994

David Clowes  
Florida Dept. of Environmental Protection  
Federal Facilities Coordinator  
Twin Towers Office Building  
2600 Stone Road  
Tallahassee, FL 32399-2400

**RE:** Responses to Florida Department of Environmental Protection (FDEP) Technical Review and Comments, Final Sampling and Analysis Plans for Category V Sites 14 and 34; Pensacola Naval Air Station, Pensacola, FL; Contract #N62467-89-D-0318, CTO-0070.

Dear Mr. Clowes:

On behalf of the Navy, EnSafe/Allen and Hoshall is pleased to submit responses to technical review and comments provided to the Navy by Mr. John Mitchell of Florida Department of Environmental Protection for the Final Sampling and Analysis Plans for Category V Sites 14 and 34.

Should you have any questions or comments regarding these comments responses, please feel free to call me.

Sincerely,

EnSafe/Allen & Hoshall

  
Brian E. Caldwell  
Task Order Manager

Enclosure

cc: Bill Hill - SOUTHNAVFACENGCOM  
Bill Gates - SOUTHNAVFACENGCOM  
EnSafe/Allen & Hoshall File - Memphis  
EnSafe/Allen & Hoshall File - Pensacola  
Allison Humphris

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**TECHNICAL REVIEW AND COMMENTS**  
**DRAFT SAMPLING AND ANALYSIS PLANS (SAPS),**  
**FOR SITES 3, 9, 10, 14, 29, 34**  
NAVAL AIR STATION (NAS) PENSACOLA  
PENSACOLA, FLORIDA

**SPECIFIC COMMENTS:**

Site 14 (Dredge Spoil Fill Area)

**COMMENT :**

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 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.

**RESPONSE:**

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," will be removed from the SAP. The Navy recognizes this area as part of Site 14 and will continue the environmental investigations here, regardless of property ownership. As a result, a thorough search of state land records is not necessary. A correction to the SAP will be submitted as an erratum.

### COMMENT :

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.

### RESPONSE

**Agreed.** These samples will **be collected** and **analyzed** in **accordance** to methods outlined in the **SAP** and Comprehensive Sampling and Analysis **Plan** (CSAP). **Corrections will be made** to the text, tables, and figures in the **site specific SAP** and submitted **as an** erratum.

### COMMENT :

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.

### RESPONSE

The **Navy** will **agree to collect** composite sediment samples in **Pensacola Bay** in the vicinity of the outfalls. The **SAP** will **be revised to** indicate that sediment samples **will be collected as** discrete and/or **composite** samples in **the bay**. If discrete samples are collected, a duplicate sample will **be collected from** at least one of the locations. **Corrections** to the **SAP** will be submitted **as an** **erratum**.

**Site 34 Solvent North of Building 3557**

**COMMENT:**

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 downgradient 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 part of the Phase I sampling.

**RESPONSE:**

Sediment sampling in the drainage ditch will be performed. However, during Phase I, samples will be collected and analyzed for grain size only to determine sediment size characteristics. If, based on grain size analysis, the sediments have the potential to adsorb contaminants, additional samples will be collected and analyzed for full Target Analyte List/Target Compound List during Phase II.