



Lawton Chiles
Governor

Department of Environmental Protection

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N00204.AR.000851

NAS PENSACOLA

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January 9, 1995

CERTIFIED MAIL

R RECEIPT REQUESTED

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: Technical Memorandum, Preliminary Results, Site 2
 Remedial Investigation, Naval Air Station Pensacola.

Dear Mr. Hill:

I have completed the technical review of the subject document, dated November 1994 (received November 10, 1994). The following comments should be addressed:

1. Based on the February 16-17, 1994 meeting in Atlanta, the Tier 1 Pensacola Team and Natural Resource Trustees agreed to use the Sediment Screening Values (SSVs) as screening/trigger levels to compare to the analytical results from sediment samples. The Team also agreed that values above the SSVs would be considered for further assessment (Phase IIB and 111) to determine ecological effects of sediment contamination. Based on the analytical results, the following constituents are above the SSVs: arsenic, cadmium, chromium, copper, lead, zinc, DDT, PCBs, and PAHs. Of particular interest are "hot spots" such as location H1 that have values of cadmium, chromium, lead and PAHs many times above not only the SSVs but also other criteria used for comparison in this document, such as Long and Morgan's ERLs and NOAA's NS & T values collected from Pensacola Bay. Thus, I recommend that further ecological assessment, such as bioassays, be conducted if the results will be useful in determining the need and type of remediation. However, if remediation of the "hot spot" by dredging or other cost effective techniques will be employed regardless of the results of the Phase IIB analysis, then the cost benefit of additional ecological assessment is questionable. These topics should be discussed further in our next partnering

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meeting with all concerned parties. In conclusion, with a 40 year history of discharge of untreated industrial wastes, analytical results of sediment samples collected near shore effluent discharge pipes above screening levels, and the preliminary human health risk assessment conclusion that there is a possible human health risk due to consumption of shellfish, it appears prudent to consider further cost effective ecological assessment and/or remediation.

2. Analytical methods other than standard CLP should be employed for silver in surface water due to the levels of silver detected many times above the Florida Surface Water Quality Standards (Chapter 62-302, F.A.C.).
3. If the conclusion of Section 6.0 relates to Section 5.0 and not to Section 4.0, it should be added to Section 5.0 and not made a separate section.

If I can be of any further assistance with this matter, please contact me at (904) 488-3935.

Sincerely,



David M. Clowes
Remedial Project Manager

/dmc

cc: Ron Joyner, NAS Pensacola
Allison Humphris, EPA Region IV
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Tom Moody, FDEP Northwest District
John Mitchell, FDEP Natural Resource Trustee

TJB B JJC JJC ESN ESN