



Department of Environmental Protection

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NAS PENSACOLA
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Lawton Chiles
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Virginia B. Wetherell
Secretary

January 11, 1995

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

Re: I. Draft *Remedial Investigation Report, Site 38*, Naval Air
Station Pensacola, December 6, 1994
11. Draft *Remedial Investigation Report, Site 1*, Naval Air
Station Pensacola, December 9, 1994

Dear Mr. Hill:

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

I. Draft RI, Site 38

1. Section 10.2.4 (Selection of Chemicals of Potential Concern)

In the first paragraph of the subsection, Comparison of Site Related Data to Screening Concentrations (p. 10-18), the document states "those samples collected from beneath the concrete and asphalt were evaluated relative to occupational screening criteria" rather than residential. If construction and changes at NAS Pensacola was inactive, then occupational criteria could be relevant. However, restructuring of areas of the base often occurs, therefore making the possibility for those soils beneath the asphalt and concrete to become exposed. A residential scenario should be evaluated for these soils.

2. Section 10.9 (Ecological Risk Assessment)

This section states, "Preliminary data indicate that no impacts to Benthic and Nekton communities, in the nearshore environment" (Site 2) "adjacent to Site 38, have occurred or are measurable." This statement should be removed from the

document. Sediment analysis at Site 2 has detected contaminants related to Site 38 at levels above Region IV Sediment Screening Values (SSVs). It is unknown if any effects are occurring from this contamination. Most of the Site sediment contamination likely occurred from the 35 years of surface discharge from the storm drains. However, migration of the contaminated groundwater into Site 2 may continue to have impacts.

II. Draft RI, Site 1

1. Section 8.3.1 (Surface Water and Sediment)

a. In the second paragraph on page 8-24, the document states, "Except for lead at Wetland 1, where the chronic freshwater criteria was exceeded, no other water quality criteria were exceeded by detected concentrations." This is true for federal criteria. However, the Florida Surface Water Quality Standards (FSWQS) were exceeded for aluminum arsenic, copper, iron, and lead in Wetland 1. Specifically:

Constituent	FSWQS ($\mu\text{g/L}$) fresh/marine	Wetland 1 ($\mu\text{g/L}$)
Aluminum	1500	2120
Arsenic	.05	3.4
Copper	HD/2.9	7.5
Iron	1000/300	3540
Lead	HD/5.6	6.0J

HD = Hardness Dependent

Also, iron exceeded FSWQS in all the wetlands investigated.

b. In the subsection, Wetland 1, the document indicates "SSVs were unavailable for the other constituents detected." When no SSV is available from the Region IV Sediment Screening Guidelines, we recommend that the SSV be established as twice the background/reference concentration.

2. Section 13.0 (Conclusions and Recommendations)

The document states under the subsection Ecological Risk that "In Wetland 1. both benchmark values for lead were exceeded for surface water and sediment. However. risk from lead in Wetland 1 sediment is most likely low. The SSV was exceeded slightly, and no measure of risk was intended by

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the SSVs." The SSVs were not intended as a risk measurement, but as a value to determine whether to continue with Phase IIB for the wetland. Also, refer to Comment No. 1 concerning other contamination which is above standards in Wetland 1.

Due to some SSVs being exceeded in many of the adjacent wetlands, consideration needs to be given to continuing with Phase IIB for the remedial investigation of these wetlands. This can be discussed in future meetings.

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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