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Virginia B. Wetherell
Secretary

March 8, 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 *RI/FS Sampling and Analysis Plan for Site 41, NAS Pensacola Wetlands*, Naval Air Station Pensacola, February 15, 1995
11. Draft *Final Remedial Investigation/Feasibility Study Work Plan for Site 41, NAS Pensacola Wetlands*, Naval Air Station Pensacola, February 10, 1995

Dear Mr. Hill:

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

I. RI/FS SAP for Site 41

1. Table 2-1 (Summary of Sources and Pathways)

Based upon the site map, we believe the following wetlands need to be added to the column under "Specific Wetland(s) Potentially Impacted" for these certain sites:

- a. Wetland W2 - Site 1, 5, 6, and 16
- b. Wetland 54 - Site 3
- c. Wetland 55 - Site 5
- d. Wetland 62 - Site 3
- e. Wetland 64 - Sites 9, 10, 29, 30, and 34

2. **Document Sampling Location Figures**

All figures throughout the document which denote the surface water and sediment sampling locations should include the location of any monitoring wells.

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3. Figure 4-2 (Wetland 5 Sample locations)

We recommend an additional sediment sample be taken about 250 feet downgradient from the current most proposed sediment sample. Also, the industrial sewer line and manholes for Site 36 which are in the vicinity of Sites 27 and 30 should be shown on the figure. Also refer to comment #2.

4. Section 4.3.1 (Wetland 6 Associated Sites Historical Summary)

Sites 27 and 30 should also be included as a site which may have historically or may currently impact the portion of Wetland 6 north of the confluence of Wetland 5. Also, since Site 12 is also considered for potential affect, shouldn't Site 26, which is close to Site 12, also be included.

5. Section 4.4.1 (Site 1 Historical Summary)

The second paragraph should also indicate the northerly flow of groundwater flows into Bayou Grande.

6. Figure 4-4 (Wetland 1 Sampling Locations)

The extent of the boundaries for Sites 1 and 16 should be indicated on the figure. Also refer to comment #2.

7. Figure 4-5 (Wetland 3 Sampling Locations)

The extent of the boundary of Sites 1 should be indicated on the figure. Also refer to comment #2.

8. Figure 4-6 (Wetland 4 Sample Locations)

Refer to comment #2.

9. Figure 4-7 (Wetland 15 Sample Locations)

The extent of the boundary of Sites 1 should be indicated on the figure, Also refer to comment #2.

10. Figure 4-8 (Wetland 16 Sampling Locations)

The extent of the boundary of Sites 1 should be indicated on the figure. Also refer to comment #2.

The proposed sediment sample location is not indicated on the figure. We suggest one near the beginning of east end of the channel leading to the bayou. Also, we suggest another surface water sample be taken near the southeast portion of the wetland.

11. Figure 4-9 (Wetland 17 Sampling Locations)

The extent of the boundary of Sites 1 should be indicated on the figure. Also refer to comment #2.

Based upon previous analytical results in this wetland, we suggest only one SW/SD sample is needed.

12. Figure 4-10 (Wetland 18 Sampling Locations)

The extent of the boundary of Sites 1 should be indicated on the figure. Also refer to comment #2.

13. Section 4.5.1 (OU 10 Historical Summary)

On p. 4-53 the document states, related to Wetland 13, that "a bilge water spill reportedly occurred at this site. This spill, suspected to have occurred in the area of Wetland 13, will be investigated under the FDEP UST program, separate from Sites 32, 33, and 35." According to Figure 4-11, Wetland 13 is east of the Bilge Water Treatment Plant (BWTP). The wetland affected by the bilge water spill was immediately adjacent to and west of the BWTP. This was either Wetland 12 or east of Wetland 12. This error should be corrected.

Also, at previous meetings, we discussed the wetland affected by the bilge water spill and that it would be included in the Site 41 investigation. We had previously wanted it studied related to OU 10, but agreed to postpone the study until the Site 41 investigation. We still believe this wetland and Wetland 13 should be evaluated under CERCLA due to there being in the immediate vicinity of OU 10.

14. Figure 4-11 (Wetlands 10 and 12 sampling Locations)

As stated in comment #13, we believe Wetland 13 needs to be included for investigation. Also refer to comment #2.

15. Figure 4-12 (Wetland 63A Sampling locations)

The figure should include the locations of Buildings 2662 and 3380. Also refer to comment #2.

16. Figure 4-13 (Wetland 63B sampling Locations)

Refer to comment #2

16. Figure 4-14 (Wetland W1 Sampling Locations)

No proposed sediment sample locations are indicated on the figure, yet the legend gives the indication there are. This symbol should be removed from the figure to eliminate any confusion. We agree no further samples are needed in this wetland. Also refer to comment #2.

17. Section 4.7.3 (Proposed Wetlands 52 and 48 Sample Locations) and Figure 4-16 (Wetlands 48 and 52 Sampling Locations)

We do not quite understand the sampling locations. Even though Wetland 48 appears to be a location of groundwater discharge and flows into Wetland 52A, this specific area shown in the figure does not appear to be downgradient from any sites. Site 3 is the nearest site and is northeast of the sampling locations. Groundwater flow at Site 3 is to the south and southeast; away from the designated sampling locations in Figure 4-16. We are not opposed to sampling these locations, but we believe other more significant areas of the Wetland 52 system would be more appropriate.

After reviewing Figure 2-1 and Figure 4-20, we recommend sampling also be performed in the wetland areas hydrologically (surface water and groundwater) downgradient of Site 3 and Wetland 1A. Specifically, Wetlands 52, 52D, 52B, 62, and the eastern portion of 52A as these have more potential of being affected by sites.

18. Figure 1-17 (Wetland 72 Sampling Locations)

We recommend that the most downgradient proposed sediment sample be at least 200 feet further downstream. Also refer to comment #2

19. Figure 4-18 (Wetland 19A and 19B Sampling Locations) and Figure 4-19 (Wetland W2 Sampling Locations)

We are unsure about needing a surface water and sediment sample in the upgradient portion of Wetland 19A. Wetland 19 appears to drain easterly toward Bayou Grande. We also, believe an additional surface water and sediment sample should be performed in Wetland W2 upgradient of its confluence with Wetland 1.

The delineation of the Site 16 boundary should be shown on these figures. Also refer to comment #2.

20. Section 4.9 (site 4 Wetlands)

We do not recommend sampling of wetlands for Site 4 until Site 4 has been investigated and contamination found to be of a significant problem.

21. section 4.12 (control Wetlands 25, 32, and 33)

We are not opposed to using Wetlands 32 and 33 as reference locations. However, Wetland 25 poses some question due to its close vicinity to the first point of land to the east on Bayou Grande. The FDEP sediment group had a sampling location off this point which had elevated hits of metals, PAHs and PCBs (FDEP, 1994). We suggest the reference wetland be further west; possibly Wetlands 27A and 27B, or Wetlands 70A and 70B).

22. Section 4.13.7 (Site 27)

This section indicates that Site 27 might be of concern for Wetland 6 which is 100 feet east of the site. We suggest that the closer Wetland 5A may be a location of contaminant migration from this site.

23. Section 4.13.8 (Site 31)

We believe Wetland 5A is more likely to have been impacted from this site rather than Wetland 64.

24. Appendix D (Piezometer, Rain Gauge, and Staff Gauge Installation Procedures)

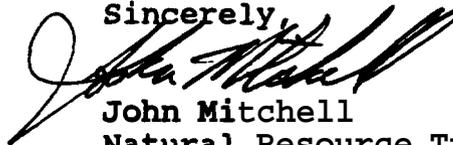
We also recommend tide staff gauges be installed in tidal estuarine wetlands, and these gauges correlated to a local tidal control gauging stations to measure any tidal affects on groundwater flow.

11. RI/FS Work Plan

Our only comment concerns the title of Appendix D and Table D-1. Each should have the word "Other" preceding the word "Sites."

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

Reference

Seal, T.L. Calder, F.D. Sloane, G.M. Schropp, S.J. Windom, H.L. 1994. *Florida Coastal Sediment Contaminants Atlas, a Summary of Coastal Sediment Quality Surveys*. Florida Department of Environmental Protection, Tallahassee, FL. 112pp.

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