



Department of Environmental Protection

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NAS PENSACOLA
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Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

June 7, 1995

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

Re: NAS Pensacola Superfund Site

1. Draft Final *Sampling and Analysis Plans, Sites 15, 17, 18, 24, and 28*, March 1, 1995
2. Draft *Remedial Investigation Report, Sites 9, 29, and 34*, May 9, 1995
3. Draft *Preliminary Site Characterization Report, Site 10*, May 10, 1995
4. Draft *Preliminary Site Characterization Report, Site 14*, May 11, 1995

Dear Mr. Hill:

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

SAPs for Sites 15, 17, 18, 24, and 28

No comments.

RI Report, Sites 9, 29, and 34

1. Section 2.1 (Site Area Description) for Site 34, p. 2-6, states that "it is presumed that contaminants were carried offsite via" the drainage swale. It should indicate where contamination migrated offsite (i.e., Bayou Grande Yacht Basin).

2. Section 5.1.1 (Phase I Soil Investigation), p.5-7, indicates a sediment sample was taken. No where is the location of this sediment sample indicated; in text or figures. Please correct. The results should also be included in Section 7 (Nature and Extent of Contamination) and in the analytical results (Appendix D).
3. In Section 7, all site figures should show the location of Site 36 (Industrial Waste Sewer Line). Also, figures for Site 34 should show the location and length of the identified swale. Any surface drainage features should be shown on all site figures.
4. Section 9.2.4 (Groundwater Transport), p. 9-11 - 9-13, provides the approximate time it would require for groundwater constituents to discharge into the nearby drainage ditch. Although these travel times are based on advective transport and do not take into account dispersion and diffusion, the short travel time and the length of time since contamination occurred increase the likelihood that the worse contamination has already discharged into the ditch and only residual contamination remains. This possibility is accentuated by the last sentence of this section.
5. Section 9.3 (Current and Potential Receptors), p. 9-14, states FDEP Class II surface waters are for recreation and maintenance of a well balanced fish and wildlife population. That is the description of a Class II waterbody. A Class II waterbody is for maintenance of shellfish propagation or harvesting.

Preliminary Site Characterization, Site 10

Our only comment concerns the level of dieldrin concentrations at surface soil sampling station 10S0101 and 10S0201, and subsurface sampling station 10S0207. Although dieldrin concentrations at the surface may be from anthropogenic activities, it is highly insoluble except under certain conditions (i.e., mixed with acetone or benzene). The detection in the subsurface soil sample presents the question of why the dieldrin detected at the surface appears to be migrating to such an extent.

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preliminary Site Characterization. Site 14

No comments.

Should you have any questions, please contact me at (904)
487-2231.

Sincerely,



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

cc: Pat Kingcade, FDEP
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