



Department of Environmental Protection...

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July 20, 1995

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

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NAS PENSACOLA
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Re: Draft Final *Remedial Investigation/Feasibility Study Work Plan* and Draft *RI/FS Sampling and Analysis Plan* for Sites 40 and 42 Bayou Grande and Pensacola Bay, NAS Pensacola, June 28, 1995

Dear Mr. Hill:

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

RI/FS Work Plan

1. Section 3.1 (ARARS and Screening Values) indicates on p. 29 using the January, 1993, Florida Sediment Quality Assessment Guidelines (SQAGs). The most recent November, 1994, SQAGs should be used for evaluation.
2. Section 4.3.2 (Evaluating Contaminant Levels) mentions on p. 54 using the FDEP metal to aluminum ratios for evaluating metal contamination. This can only be used quantitatively when using sediment analytical methods involve total digestion methods. They can only be used qualitatively when using other analytical methods. This should be noted in the document.

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1. On page 19, Site 15 should also be mentioned as a potential source of contamination for Assessment Zone 3. Also, Site 11 and Operable Unit 10 should be mentioned as a likely contributor to contamination in Assessment Zone 4.

2. Under Section 4.2 (Sampling Locations, Methods, and Analysis), on page 22 the document indicates TAL/TCL constituents will be analyzed in sediment elutriate. Is this in addition to whole sediment analysis? Elutriate analysis should only be performed if whole sediment analysis determines a constituent exceeded its screening value or twice its reference value if a screening value does not exist.
3. On page 51, the document indicates that no sandy sediment reference sites will be established as the focus of the sediment investigation is toward areas of fine grained silty sediment. We agree that this will be the primary focus of sediment sampling, however, some sandy sites may be unavoidable. Also, some sandy sampling stations occurred during the site 2 study. To completely eliminated a sandy sediment sampling reference location could create a potential data gap.
4. Under Section 5.3.2 (Assessment Endpoints), we recommend using the Belted Kingfisher (*Megaceryle alcyon*) in addition to the other species presented.

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
Eric Nuzie, FDEP
Bill Kellenberger, FDEP
John Lindsey, NOAA
Ron Joyner, USN
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