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LETTER REGARDING NAVY RESPONSES TO NATIONAL OCEANIC AND ATMOSPHERIC
ADMINISTRATION REVIEW COMMENTS ON DRAFT CONTAMINATION ASSESSMENT AND
REMEDIAL INVESTIGATION NAS PENSACOLA FL
10/13/1991
NAVFAC SOUTHERN

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CERTIFIED MAIL- RETURN RECEIPT REQUESTED

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Mr. Jay Field
U.S. Department of Commerce
National Oceanic and Atmospheric Administration (NOAA)
Hazardous Material Response Branch
7600 Sand Point Way N.E.- Box C15700
Seattle, Washington 98115

Dear Mr. Field:

Enclosed for your review are our responses to your comments on the Draft Interim Data Reports and the Proposed Recommendations for Phase II Workplans at the Naval Air Station Pensacola Sites 1, 2, 11, 12, 13, 14, 15, 24, 26, and 30.

We have incorporated your appropriate comments into the Final Interim Data Report submittals and the Draft Phase II Workplans for the above mentioned sites. The Interim Data Reports were finalized in the context of the corresponding primary document (Federal Facilities Agreement (FFA), Section VIII.B.2).

We appreciate your effort and corporation. Please contact Ms. Suzanne O. Sanborn at (803) 743-0574, if you should have any questions pertaining to our responses or any other matter concerning the Naval Air Station Pensacola, Pensacola, Florida Installation Restoration Program.

Sincerely,

JAMES B. MALONE, JR., P.E.
MANAGER, INSTALLATION
RESTORATION, EAST SECTION

Encl:
(1) NAVY Responses to NOAA comments

copy to:
NAS Pensacola (Mr. Ron Joyner, Code 18250)
FDER (Mr. Eric Nuzie)
EPA (Ms. Allison Drew)

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RESPONSES TO COMMENTS FROM THE
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION

Comment 1, Site 1 Sanitary Landfill:

Elevated contaminant concentrations were found in soil and shallow groundwater at the site. Elevated concentrations of metals, TRPHs, PAHs and phenols were found in sediment from the ponds adjacent to Bayou Grande, some of which discharge to Bayou Grande and support NOAA resources. Sediment samples are needed to determine the extent of contamination of wetland areas to the west and southwest of the site and are not currently planned for Phase II.

Response:

Sediment and surface waters will be added in these areas for the Phase II investigation. A detailed rationale for the location of samples and analytical requirements will be provided in the Phase II work plan for this site.

Comment 2, Site 2, Waterfront Sediments:

Metals, TRPHs, VOCs and PAHs were found in near shore sediments. Elevated metals and PAH concentrations were located along the eastern portion of the southern waterfront area where untreated industrial waste had formerly discharged. Elevated TRPH concentrations were widespread.

Planned Phase II samples should be analyzed for PCBs and pesticides at detection limits that will show effects on aquatic life.

Response:

Pesticides and PCBs will be added to the analyses. The detection limits will be the lowest achievable using standard EPA methods and full CLP protocol.

Comment 3, Site 11, North Chevalier Disposal Area:

Contamination from burning, landfilling and disposal of industrial wastes was found in soil and groundwater throughout the site. The site is adjacent to Bayou Grande and sediment sampling there found high contaminate concentrations from the site.

Phase II soil, groundwater, and sediment samples should be analyzed for radionuclides. Detection limits for pesticides and PCBs should be below AWQC and ER-L values.

Sediment samples in addition to the planned Phase II samples (to be included in Site 30 sampling) should be collected to delineate the extent of the high contaminant concentrations found in Bayou Grande and to determine the extent of contamination in the wetland areas adjacent to Bayou Grande.

Response:

All Phase II samples will be analyzed for gross alpha, beta and gamma radiation to screen for radionuclides. Detection limits for pesticides and PCBs will be the lowest achievable using standard EPA methods and full CLP protocol. Additional investigation of Bayou Grande and adjacent wetlands will be performed during the ecological risk assessment of Site 40 (Bayou Grande area) and Site 41 (NASP Wetlands).

Comment 4, Site 30, Buildings 649 and 755:

Former plating operations at these buildings is considered to be the source of most contamination found at the site, although some contamination may result from off-site sources. Elevated contaminant concentrations were found in soil and groundwater at the site. Sediment and surface water near the site are contaminated with metals, TRPHs, PAHs and phenols. Undetermined concentrations of pesticides and PCBs were also found in sediment near the site.

Additional Phase II sediment samples should be collected to determine the extent of the high metals concentrations found at two sampling locations in Bayou Grande near Site 11. For all Phase II samples, PCBs and pesticides should be analyzed for using detection limits less than the AWQC and ER-L values.

Response:

Extensive sampling in this area of Bayou Grande is proposed in the revised Phase II work plan for Site 30. See response to comment 3.

Comment 5, Site 12, Scrap Bins:

The facilities at the site which include a salvage yard with a compactor, a chemical storage shed and storage bins are likely sources of contamination found at the site. Elevated surface radiation readings were found and a boring was abandoned because of radiation levels to 300 uR/h. High concentrations of metals, PAHs and PCBs were found in sediment samples from a storm drain at the site. Elevated contaminant concentrations were also found in soil and groundwater.

Phase II groundwater and sediment samples should be analyzed for radionuclides. Lower detection limits should be used for PCB and pesticide sampling analysis in Phase II.

Response:

Phase II samples on all sites will be analyzed for gross alpha, beta and gamma to screen for radionuclides. Phase II detection limits for pesticides and PCBs will be considerably lower than those for Phase I.

Comment 6, Site 15, Pesticide Rinsate Disposal Area:

Arsenic was found in high concentrations in both soil and groundwater at the site, which is located near Bayou Grande. A high concentration of mercury was found in an existing permanent well at the site.

Lower detection limits should be used for pesticides in Phase II sampling analysis. Because mercury was not analyzed for in soils previously, all samples should be analyzed for metals to determine the source of the high mercury concentration found in the permanent monitoring well.

Possible surface water pathways should be investigated.

Response:

Phase II samples will include analysis for all Target Analyte List (TAL) Metals including mercury. Detection limits for pesticides and PCBs will be lower and possible surface water pathways will be investigated on all sites.

Comment 7, Site 24, DDT Mixing Area:

The site is located in the center of the peninsula and therefore is of less concern than the sites adjacent to surface water. Lead found in soil and groundwater throughout the site is the contaminant of concern. The source of the lead contamination is uncertain, but was suspected to be from the occasional use of aviation fuel for mixing with DDT instead of diesel fuel.

All Phase II soil samples should be analyzed for TCL metals. Lower detection limits for pesticides should be used. Possible surface drainage pathways from the site should be investigated during Phase II.

Response:

See responses to comments 5 and 6.

Comment 8, Site 13, Magazine Point Rubble Disposal Area:

The site is a narrow strip of land along Pensacola Bay where building rubble and construction materials were disposed. Several surface radiation readings were recorded above background, including a mass of metal ship parts which had a reading of 100 uR/h. Floor tiles from the rubble were found to contain 5% to 20% asbestos materials.

Elevated concentrations of metals, TRPHs, PAHs and phenols were found at the site in the vicinity of the IWTP and adjacent to Pensacola Bay. It is suspected that the IWTP and Chevalier Field runways may contribute more to contamination at the site than the rubble disposed there. Contamination of the area is of concern because of the proximity to Pensacola Bay.

Radionuclides should be analyzed for in Phase II soil and groundwater samples. Sediment samples should be collected from Pensacola Bay in the vicinity of the elevated contaminant concentrations found in soil and groundwater.

Response:

See responses to comment 5 and 6. Sediment and surface water samples will be collected in this area and analyzed for the full TAL/TCL.

Comment 9, Site 14, Dredge Spoil Fill Area:

Contaminated sediments from Pensacola Bay were placed at the site in the late 1970's when the Bay was dredged to create an aircraft carrier turning basin and port. Chevalier Field, west of the site, is suspected to be the source of some of the contamination found. Wetland areas which receive drainage from Chevalier Field are located north and south of the dredge spoil fill area.

Sediment, soil, and groundwater contamination are present, but probably not at high concentrations. The site is of concern because of its location on Pensacola Bay. Structures to control fuel spills from Chevalier Field and oil/water separators should be constructed here.

Response:

Surface drainage to the wetlands at Site 14 and Pensacola Bay primarily occurs from the southeastern portion of Chevalier Field. A storm water in-fall grating inlet is located at the southeastern corner of the field; from there discharge flows to a culvert outfall and drainage ditch that is located on the southern boundary of the Dredge Spoil Fill Area. The storm water inlet and culvert do contain an oil-water separating unit, and the discharge to the drainage ditch is monitored for flow, pH, oils and greases, suspended solids, and temperature under NPDES permit FLO002500, outfall serial no. 006. In addition, surface water and sediment samples are proposed in this area during Phase II.

Comment 10, Site 26, Supply Department Outside Storage:

The site is an open shed on a concrete pad used for chemical storage, located in the center of the Peninsula. Slightly elevated contaminant concentrations were found in soil and groundwater. The source of 1,1,1-Trichloroethane found in groundwater has not been determined. TRPHs were found in most soil samples.

Response:

Comment noted. Further investigation of Site 26 for these concerns will occur during Phase II.