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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION RESPONSE TO COMMENTS  
TO DRAFT FINAL REMEDIAL INVESTIGATION FEASIBILITY STUDY SAMPLING AND  
ANALYSIS PLAN SITE 41 NAS PENSACOLA FL  
03/08/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

**JOHN MITCHELL — FDEP  
RESPONSE TO COMMENTS  
DRAFT FINAL RI/FS SAMPLING AND ANALYSIS PLAN, SITE 41  
NAVAL AIR STATION PENSACOLA  
COMMENTS DATED MARCH 8, 1995**

**COMMENT 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

**RESPONSE:**

- a. Agreed.
- b. Agreed. However, impacts to Wetland 48 and 52 should be determined first before Wetland 54 is sampled.
- c. Wetland 55 is over 1 mile away from Site 5. This wetland is not considered potentially impacted by Site 5.
- d. Agreed. However, impacts to wetlands 48 and 52 should be determined first before Wetland 54 is sampled.
- e. Agreed.

**COMMENT 2:**

**Document Sampling Location Figures**

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

**RESPONSE:**

New figures will be generated which show the location of all nearby monitoring wells. Because of the density of monitoring wells on some figures, not all monitoring wells can be labeled.

**COMMENT 3:**

**Figure 4-2 (Wetland 5 Sample Location)**

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.

**RESPONSE:**

The purpose of the initial Phase IIA sample is to determine whether contamination may be present at "hot spots". These sample locations were chosen by E/A&H personnel based on historical information about the site, the wetland in question, and a site reconnaissance. Depending on sample results, locations in addition to those shown on the figures may be sampled. In the case of Figure 4-2, additional sample locations may be collected, depending on sample results from wetlands 5A and 5B.

The industrial waste sewer line will be shown where it extends onto Figure 4-2. The manholes are not considered sources of contamination. Please refer to the *Draft Sampling and Analysis Plan for Site 36-Industrial Wastewater Treatment Sewer Line, Naval Air Station, Pensacola, Florida. January 1995.*

**COMMENT 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.

**RESPONSE:**

This section is intended to be a historical summary of sites immediately associated with or adjacent to a particular wetland or wetland complex. A historical summary of Site 30 is described in the previous section as it pertains to Wetland 5. Discussing Site 30 in detail as it pertains to Wetland 6 would lead to repetitive information. Since it is already stated in Table 4-1 which sites may have impacted particular wetlands, it is not necessary to go into further detail in the text.

Site 26 is not included because it is a UST site and will be addressed under the UST program.

**COMMENT 5:**

**Section 4.4.1 (Site 1 Historical Summary)**

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

**RESPONSE:**

This will be mentioned in the text.

**COMMENT 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.

**RESPONSE:**

The boundaries of Sites 1 and 16 and the location of all nearby monitoring wells will be indicated on Figure 4-4. Bear in mind that the exact boundaries of Site 1 and Site 4 are not known. The best estimates will be provided.

**COMMENT 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.

**RESPONSE:**

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-5.

**COMMENT 8:**

**Figure 4-6 (Wetland 4 Sample Locations)**

Refer to comment #2.

**RESPONSE:**

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-6.

**COMMENT 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.

**RESPONSE:**

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-7.

**COMMENT 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 to be taken near the southeast portion of the wetland.

**RESPONSE:**

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-8. Three sediment samples will be placed on Figure 4-8.

**COMMENT 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.

**RESPONSE:**

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-9. Two sediment samples and one surface water sample will be collected from this wetland and will be shown on Figure 4-9.

**COMMENT 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.

**RESPONSE:**

The boundaries of Site 1 and the location of all nearby monitoring wells will be indicated on Figure 4-8. Three sediment samples will be placed on Figure 4-10.

**COMMENT 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 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 the 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 that this wetland and Wetland 13 should be evaluated under CERCLA due to there being in the immediate vicinity of OU 10.

**RESPONSE:**

The text on page 4-53 and the discrepancy with Figure 4-11 will be corrected. Wetland 13 will also be investigated because of its proximity to OU 10.

**COMMENT 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.

**RESPONSE:**

Wetland 13 will be included in the investigation. One sediment sample and one surface water sample will be collected from this wetland.

**COMMENT 15:**

**Figure 4-12 (Wetland 63A Sampling Locations)**

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

**RESPONSE:**

These buildings will be included. Site boundaries will be included to the most accurate extent possible.

**COMMENT 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.

**RESPONSE:**

The legend depicting proposed sediment sample locations will be removed from Figure 4-14.

**COMMENT 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.

**RESPONSE:**

A field survey was performed to determine the best locations for sampling wetlands 48 and 52. It was determined that wetlands 48 and 52 have unique drainage patterns. Wetland 48 begins as a drainage culvert from the area of Site 3 and continues east until it crosses under Blue Angel Parkway.

**COMMENT 18:**

**Figure 4-17 (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.

**RESPONSE:**

Agreed.

**COMMENT 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.

**RESPONSE:**

All of these wetlands are hydraulically contiguous. Samples will be collected in those areas shown for that reason.

**COMMENT 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.

**RESPONSE:**

The Tier I partnering team has decided to continue the Site 41 investigation as planned.

**COMMENT 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 of 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.

**RESPONSE:**

Wetlands 27A and 27B will be used instead of Wetland 25 as a reference wetland.

**COMMENT 22:**

**Section 4.13.7 (Site 27)**

This section indicated 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.

**RESPONSE:**

Wetland 5A will be added as a potential wetland of concern.

**COMMENT 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.

**RESPONSE:**

Wetland 5A will replace Wetland 64 as the potential wetland of concern.

**COMMENT 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.

**RESPONSE:**

This has been done at other sites in the area of Bayou Grande, and there has been no influence noted from tidal effects on groundwater flow.

**RI/FS Work Plan**

**COMMENT 1:**

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

**RESPONSE:**

This change will be made.