



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

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NAS PENSACOLA

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Mitchell
Project Manager
Office of Marine Programs and Planning
Florida Department of Natural Resources
Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399

Dear Mr. Mitchell:

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 FDNR comments

copy to:

NAS Pensacola (Mr. Ron Joyner, Code 18250)

FDER (Mr. Eric Nuzie)

EPA (Ms. Allison Drew)

**RESPONSES TO COMMENTS FROM THE
FLORIDA DEPARTMENT OF NATURAL RESOURCES**

Comment 1, Site 1 (Sanitary Landfill):

Contamination of the surface water and sediments were detected in Bayou Grande and the ponds adjacent to the site. Also, due to the color of the leachate in the pads and at the base of the pond vegetation, iron and manganese may be in high quantities.

The proposed Phase II recommendations expand the number of sediment and surface water samples. However, the sampling is limited primarily to analysis of ENAs and a few TRPHs in Bayou Grande and for metals and ENAs in the pads. Why aren't all parameters being analyzed in all the adjacent water bodies? Are iron and manganese going to be tested for in the metal samplings and why weren't they tested for in the Phase I sampling?

In the habitat and biota survey, a variety of species were found in both the upland and submerged habitats. As the soils, sediments, and surface waters are contaminated, sampling of the flora and fauna should be performed to determine if there is any bioaccumulation in any of the species. Direct and indirect link to the human food chain can be attributed to many of the species found on and adjacent to the site.

Response:

Iron and manganese were not included in the list of approved Phase I screening parameters; however, the Phase II work plan will be modified to include the full TAL/TCL on almost all samples at all sites. Sampling of the flora and fauna at this site will be conducted as part of the ecological risk assessment for Site 40 (Bayou Grande area) and Site 41 (NASP Wetlands).

Comment 2, Site 2 (Waterfront Sediments):

Detectable levels of contamination were found in the sediments. The additional sampling and analysis recommended for Phase II is commendable.

Benthic samples also need to be studied, considering the types of fauna observed reside in the sediments and serve as a food source for larger animals. Some of these species are filter feeders, which would indicate a high potential for bioaccumulation of contaminants.

Benthic faunal sampling at this site will be conducted as part of the ecological risk assessment for Site 42 (Pensacola Bay area).

Comment 3, Site 11 (North Chevalier Disposal Area) and Site 30 (Buildings 649 and 755):

The contamination results of the surface water and sediment sampling for Site 30 shows direct correlation to Site 11 in the area of Bayou Grande. The surface water quality was below class II standards. Phase II recommendations show more sampling of surface water and sediments in Bayou Grande, however, they do not extend further out in the Bayou than what was initially done in Phase I.

We would like to see more sampling performed further north in the southern arm of Bayou Grande. We would also like benthic sampling and analysis in Bayou Grande as the habitat has been contaminated. The Habitat and Biota survey results for Site 11 states "no indication of stressed biota was observed." However, the previous paragraph mentions a benthic coring was performed in the marsh

revealing no biota. If the habitat was not stressed, than one would expect some living organisms within the marsh sediments. Sampling and analysis of the flora and fauna in the marsh and bayou should be performed to assess natural resource damage and possible bioaccumulation of contaminants within species. This also applies to the wetland adjacent to Buildings 649 and 755.

Contamination of Bayou Grande may also be related to other areas of the base south of where the creek leading from Buildings 649 and 755 joins the north/south drainage ditch. We recommend further sampling of the ditch south of this confluence as most surface water drains from the southwest end of Chevalier Field.

Response:

Sediment, surface water, and benthic faunal and floral sampling will be conducted further out in this area of Bayou Grande as part of the ecological risk assessment for Site 40 (Bayou Grande area). Extensive sampling of both sediment and surface water in the wetlands, creek, drainage ditch, the marsh area and Bayou Grande will be proposed in the revised Phase II work plan for Site 30.

Comment 4, Site 12 (Scrap Bins):

Sediment contamination was found in the sediments of the storm water drain. As contaminants may have progressed off-site through this drainage system, further sampling of the complete drain system should be performed, as well as location of the outfall of that drainage system. We realize contamination within other areas of the storm drain may be from locations other than Site 12.

Response:

The Navy agrees with this comment and has added additional sampling of the drainage system and the outfall area to the Phase II investigation for Site 12.

Comment 5, Site 13 (Magazine Point Rubble Disposal Area):

Sediment and surface water sampling needs to be analyzed for Pensacola Bay. Also a habitat/biota survey should be performed in the sediments and water adjacent to this site.

There does not appear to be significant contamination emanating from this site, but is traced back to the IVTP (Group 0). Yet review of the plan for Group 0 is dependent on the study at this site. No surface water or sediment samples are addressed for this area of Pensacola Bay, yet shallow groundwater has been effected which may leach into the bay.

Response:

Sediment and surface water samples as well as a habitat/biota survey have been added to the Phase II investigation for Site 13.

Comment 6, Site 14 (Dredge Spoil Fill Area)

Elevated levels of contamination was detected in all sediment samples, but were highest in samples 3 and 4 which are located in Pensacola Bay. Phase II increases the number of sediment samples at the southwest area of the site, but no additional samples are designated for the bay. We would like more samples taken in the bay between the outfalls from the site.

Also, the habitat biota survey at the site appears to have excluded the marine environment of the bay and should be performed. If further sampling shows contamination above safe limits, benthic sampling should be analyzed.

Response:

Sediment and surface water samples as well as a habitat/biota survey have been added to the Phase II investigation for Site 14.

Comment 7, Site 15 (Pesticide Rinse Disposal Area):

We perceive a limited concern at this site based on Phase I results. However, groundwater and surface water flow is toward the golf course and the pond located at the NE corner of the golf course. Due to possible surface water run-off from the soils and possible surficial aquifer leachate occurring in the pond, surface water and sediment sampling should be performed in the ponds. This pond has a tidal connection to Bayou Grande through a culvert at the north edge of the pond.

Response:

Sediment and surface water samples will be collected in this pond and in Bayou Grande as part of the Phase II investigation of Site 1.

Comment 8, Site 24 (DDT Mixing Area)

Refer to General Comments.

Response:

See responses to general comments.

Comment 9, site 25 (Supply Department Outside Storage):

Refer to General Comments.

Response:

See responses to general comments.

Comment 10, General Comments:

As a natural resource trustee, the Florida Department of Natural Resources perceives the entire naval base as a site of potential contamination of our trust resources. Our trust resources include all of Bayou Grande, Pensacola Bay, and the tidal estuaries and sloughs in and around the base. We have jurisdiction over these submerged lands and the marine environment.

The Pensacola Naval Air Station is identified by USEPA as a site on the National Priorities List. We commend the Navy, and E & E for identifying all potential sources of contamination (PSC) and proceeding to identify the extent of contamination for those specific PSC. However, all of these sites are located on a peninsula surrounded by our trust resources. All surface water run-off, drainage, and groundwater leachate flow from the base into our trust resources. Most of the above sites do not address the surface water flow from the PSC. The only ones addressing surface water are Site 1, 11 and 30.

We believe sediment sampling and analysis needs to be performed in all areas of the water body surrounding the base. Also surface water flow needs to be addressed thoroughly at those sites not directly adjacent to a creek, bayou, or bay. All of the Phase I studies of the sites state contamination may be from ambient sources.

Response:

In response to FDNR's concerns, the Navy is fully committed to the evaluation of all surface waters and associated environments on and surrounding the NAS Pensacola. Storm water runoff, surface water flow and groundwater discharge were considered during the Phase I investigation, as well as the proposed Phase II investigation. For example, during Phase I routes of storm water runoff into surface water bodies were looked for and were to be sampled, if found. None were observed for this group of sites; however, extensive surface water and sediment sampling in adjacent water bodies was performed. In addition, in response to your comments, more extensive sampling of surface waters and sediments is now proposed for Phase II. For areas that are not directly associated with these (Batch 1) sites, these concerns will be addressed during the Phase II work on Batch 2 sites or the ecological risk assessments for Site 40, (Bayou Grande area), Site 41 (NAS Pensacola Wetlands) and Site 42 (Pensacola Bay).