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International Specialists in the Environment

December 3, 1992

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

RE: Responses to Comments on the 100% Draft Interim Data Reports and Revised Investigation Work Plans for Site Groups F, G, J, K, M and N, Contamination Assessment/Remedial Activities Investigations, Naval Air Station (NAS) Pensacola, Florida

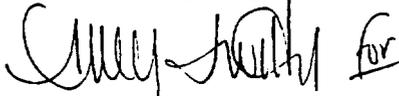
Dear John:

Ecology and Environment, Inc., (E & E) is pleased to submit to the Florida Department of Natural Resource (FDNR) one copy of responses to comments on the 100% draft interim data reports and revised investigation work plans for site groups F, G, J, K, M and N for the above-referenced project. The comments were received from the U.S. Environmental Protection Agency, Region IV, the Florida Department of Environmental Regulation and FDNR. Ms. Linda Martin of Southern Division, U.S. Navy has reviewed and approved the comment responses.

If there are any questions or comments concerning these comment responses or other matters pertaining to the project, please feel free to contact me at (904) 435-8925.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.



John D. Barksdale', P.G.  
Program Manager

JDB/sw/26:15

#### Attachments

cc: L. Martin; SouthNavFacEngCom--Charleston  
J. Wilcox; E & E--Buffalo/Central File UH8000  
G. Gallagher; E & E--Tallahassee  
C. Tronolone; E & E--Buffalo  
H. Beiro; EnSafe--Memphis

Attachment C

RESPONSES TO **COMMENTS FROM TEE**  
FLORIDA DEPARTMENT OF NATURAL RESOURCES (FDNR)  
**DRAFT REVISED WORK PLANS, FOR SITE GROUPS P, G, J, K, M AND N**  
NAVAL AIR STATION (NAS) PENSACOLA  
PENSACOLA, FLORIDA

**GROUP F: SECTION 14.2 (PHASE II - CHARACTERIZATION/EXTENT DELINEATION)**

**Comment :**

On page 14-21, sediment sampling is included for only the stormwater drainage ditch at Site 34. However, a major drainage ditch flows through the middle of Site 23 for which no sampling is planned. A surface water/sediment (SW/SD) sample is being taken for background purposes in the ditch adjacent to Site 30. As another storm drainage ditch traverses the length of Site 23, we would like SW/SD samples performed and analyzed for all parameters in the drainage ditch at this site.

This ditch is a main source for surface runoff and surficial groundwater transmission. Surficial groundwater contamination has been discovered in this area from remedial investigation activities for Group N (Site 36).

**Response :**

Surface water and sediment sampling has been proposed in this area in conjunction with the Phase II investigation of Site 30 (Buildings 649 and 755) in the Group E work plan. Please see the responses to the EPA's specific comments 2E and 2F for Site 10.

**GROUP G: SECTION 3.1 (SITE 25 - RADIUM SPILL AREA)**

**Comment :**

We find the last paragraph of page 3-1 confusing. It states:

"A fenced storage area adjacent to Building 780 has been used for drum storage since the 1970's (NEESA 1983). It is not known how many drums are currently being stored in this area or the procedures being used for the disposal of radioactive waste."

This is written in the present tense. Is radioactive waste still being generated, stored in drums on site, and disposed of? We thought this activity had been discontinued. Also, if this is a current operation, why are the disposal procedures unknown?

**Response:**

Current information regarding Building 780 and the drums located there are in Sections 1 and 3.2 of the IDR for Site 25. Section 3.1 of the work plan has been amended with the current information.

GROUP J: SECTION 14.2.3.1 (SURFACE WATER AND SEDIMENT SAMPLING)

Comment :

A SW/SD sample is being performed 500 feet downstream from the southern outfall of the southern storm drain at Site 3. We would also like a SW/SD sample taken 500 feet downstream from the northern outfall of the northern storm drain.

Response :

The stormwater drainage maps of this area indicate that the northern outfall is located at the convergence of several other drainage systems therefore, a sample collected downstream from this location would not necessarily be directly attributable to Site 3. In order to meet the objectives of the Site 3 investigation, sampling should be performed directly at the outfall.

Section 18.4 (Risk Characterization)

Comment :

What is the Integrated Risk Information System (IRIS)? It is not mentioned nor defined in the document.

Response :

IRIS is an EPA data base of parameters used to perform risk assessments.

Comment :

Also, determining risk from a baseline risk assessment for human health is appropriate. However, in determining other environmental risks, an ecological risk assessment must be performed based upon USEPA guidelines.

Response:

The Navy agrees with this comment. Ecological risk assessments may be performed, based on the results of the Phase II sampling, for each site and will also be performed in conjunction with the investigation of operating units (OUs) 15 - 17.

GROUP K

GROUP M

No specific comments.

GROUP N

Comment :

Due to the potential for ambient sources of contamination and the wide areal range of various contaminations, an assumption is made that the pollution is not caused by pipe leakage. This assumption is not adequate without actual testing of the pipeline. There could be leakage through cracked pipes or joints. This system has been in place for several years without any thorough analysis of its credibility. AS there are various sites along this industrial sewer line which have exorbitantly high contaminant results, these locations would be likely areas for examining the pipe for leaks.

Response :

The Phase I data do not support the unequivocal presence of active, continuing leaks along the sewer line. This is not to say that leaks haven't occurred in the past or are still occurring. In addition, many other potential nearby sources may exist along the sewer line. The goal of Phase II sampling rationale, as presented in the work plan, is to determine the source of contamination detected along the sewer line. The Navy believes that testing of the sewer line is impractical at this time; however, an evaluation of some portions of the line may be made after the Phase II data has been evaluated.

Comment :

Besides lead, cadmium, and chromium, two other metals (copper and zinc) resulted in high contaminant levels in soil and surficial groundwater. The levels for copper and zinc were below the Florida Drinking Water Standards. However, they, along with lead cadmium, and chromium, were well above the Florida Surface Water Standards (FSWS) for aquatic and marine life.

Response:

If groundwater contaminants are detected in close proximity to surface water bodies, where groundwater may enter and mix into the surface water body, the FSWS will be considered as a potential cleanup standard.

#### **GENERAL COMMENTS**

comment 1:

The NAS Pensacola shallow groundwater leaches into the surface water streams, wetlands, bay and bayou in the around the air station. Contaminated surficial groundwater which migrates into surface water bodies should meet FSWS for marine or fresh water.

Response:

Please see the above response for the FDNR comment for Group N.

comment 2:

The storm drainage system has the likelihood of containing ambient contaminants other than what exists at the adjacent potential Source of Contamination (PSC) site. Many areas of the base, which are not identified as a PSC, are likely sources for various pollutants, and have stormwater runoff into the storm drainage system. This system may be a PSC alone. Since some areas of these drainage ditches have elevated levels of contamination some distance from known PSCs, the Navy may want to consider making the storm drain system an operable unit.

Response:

This comment is noted.