



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

January 11, 1994

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NAS PENSACOLA  
5090.3a

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Bill Hill  
Code 1851  
Southern Division  
NAVFACENGCOM  
P. O. Box 190010  
2155 Eagle Drive  
North Charleston, SC 29419-9010

Dear Mr. Hill:

Department personnel have completed the technical review of the Draft Final Remedial Investigation/Feasibility Study Work Plans, Sites 40 and 42, NAS Pensacola. I have enclosed a memorandum addressed to me from Mr. David M. Clowes. It documents our comments on the referenced report.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

Eric S. Nuzie  
Federal Facilities Coordinator

ESN/st

Enclosure

cc: David Clowes  
Satish Kastury  
John Mitchell  
Bill Kellenberger  
Ron Joyner  
Allison Drew

Florida Department of  
**Environmental Protection**

**Memorandum**

TO: Eric S. Nuzie, Federal Facilities Coordinator  
Bureau of Waste Cleanup

THROUGH: James J. Crane, P.G. Administrator *JJC*  
Technical Review Section

Jorge R. Caspary, Professional Geologist *JRC*  
Technical Review Section

FROM: David M. Clowes, Remedial Project Manager *Jmc*  
Technical Review Section

DATE: January 11, 1994

SUBJECT: Draft Final Remedial Investigation/Feasibility Study  
(RI/FS) Work Plans for Site 40 - Bayou Grande, and  
Site 42 - Pensacola Bay; Naval Air Station Pensacola.

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I have reviewed the above referenced documents dated November 1993 (received November 30, 1993) submitted for these sites. The following comments need to be addressed before these documents can be considered final:

**General Comments:**

These documents lack the necessary information and details for a complete review. Relevant information contained in the Draft Work Plans and in response to Comment 8 of the Common Site 40 and 42 EPA comments to the Draft (summarizing the three-phase sampling approach) is omitted from the Draft Final Work Plans. Upon inquiry to the contractor of these omissions, Mr. Paul Stoddard (Ensafe), informed me that based on EPA's recommendation this information will be incorporated into Chapter 8 of the Comprehensive Sampling and Analysis Plan (CSAP) to be submitted in January 1994, and not in the Work Plans. Also, as discussed in other responses to comments for the Draft Work Plans, the Sampling and Analysis Plans (SAPs) also contain information omitted from the Work Plans, and these have not been received as of yet. Consequently, the Work Plans cannot be reviewed until the CSAP, SAPs and all other relevant documentation has not been received and approved. A solution to these problems, generated by the need to simultaneously submit these interdependent, separate documents should be discussed at the next meeting. I propose submitting the CSAP first, then combined Work Plans and site specific SAPs afterwards. This process would not only expedite the review process by decreasing unnecessary duplications of similar data; but also avoid the logistical problems, confusion, and overburden to the Navy, and contractors, and regulatory agencies to produce/review all these documents together.

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In addition, the Draft Final documents lack necessary footnotes/bolded amended text, denoting these changes and explaining the reason(s) for them; leaving the reader the burden of having to review the Draft documents again and simultaneously with the Draft Final documents.

According to the Final 1994 Site Management Plan (SMP), the Final Work plans are due on December 28, 1993, thirty days after the submittal of the Draft Finals. This is a normal review time for Draft Final documents that solely incorporate review comments of the Drafts. However, in light of the many changes made between the Draft and Draft Final documents independent of the review comments, the Final document submittals need to be delayed in order for the comments of the Drafts and Draft Finals to be addressed. Thus, an extension of at least twenty days is requested.

specific comments:

1. The proposed installation of shallow monitoring wells and groundwater remediation outlined in the text, tables and figures of the Draft documents have been omitted in the Draft Finals without explanation. Additionally, Departmental Draft review recommendations (February 19, 1993) to install additional wells have not been addressed.
2. Proposed surface water samples and surface water/total water quality stations in the Drafts have been omitted from the Draft Finals without explanation.
3. A summary of the three-phase sampling scheme outlined in a response to Comment 8 in the Common Site 40 and 42 EPA comments contains information omitted from the Draft Finals. Specifically, in Phase I the bathymetry of sediment sample collection and the time of technical memorandum submittal is omitted. In Phase II, locations where samples could be collected (storm water discharge points, areas hydraulically downgradient from PSCs, areas of surface water discharge, etc.), surface water sample collection where sediment samples exceed background or trigger levels, duration of acute and chronic toxicity tests, and timing of technical memorandum submittals are omitted.
4. The Departmental recommendation to incorporate sites potentially impacting Bayou Grande, as illustrated in Figure 3-1, into Figures 5-1A, B, and C has not been addressed.
5. Responses to Departmental comments of the Draft for Site 42 were not included.

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6. What are the missing word(s) from the sentence on page 4-14 for documents of Sites 40 and 42, "Any sites having values below this benchmark may still be studied further, particularly if the substrate markedly bioavailable"? Please explain the state of substrate bioavailability.