

Department of Environmental Protection

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NAS PENSACOLA
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Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 9, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bill Hill
Code 1851
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Draft Proposed Plan for Site 1, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated October, 1996 (received September 12, 1996) and provide the following comments.

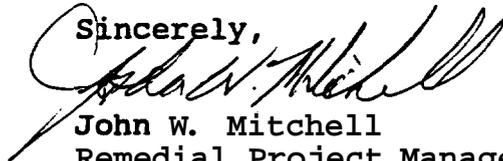
1. The subsection *Wetlands and Bayou Grande* of the Remedial Investigation (RI) Summary, on page 4, should indicate that the Florida Surface Water Quality Standard (SWQS) for iron was exceeded in all the wetland samples adjacent to the site. Other metals (e.g., lead; aluminum) also exceeded their SWQS in a limited number of the samples.
2. In Table 1 (Cleanup Goals for Groundwater), the following inorganic and organic constituents (aluminum; antimony; beryllium; chromium; iron; lead; mercury; vanadium; tetrachloroethene; naphthalene) should also be included as they exceeded the states drinking water standards. Some of these constituents exceeded the standards in both the shallow and the intermediate portion of the surficial aquifer.
3. The subsection *Ecological Risk: Groundwater* of the section Site Risk indicates that the Ecological Risk Assessment shows "no noticeable ecological risk from groundwater discharge to wetlands near Site 1." Although further evaluation of the adjacent wetlands will occur in the Site 41 Remedial Investigation, the groundwater discharge from Site 1 exceeds the SWQS and poses a potential risk yet to be quantified. This section needs to indicate that exceedence

of the SWQS from groundwater is not acceptable to the state. Ecological risk in the wetland is yet to be determined.

4. Alternative 3 (Description of Alternatives) needs to show that institutional controls will also include restricted use of the groundwater.
5. The subsection Overall *Protection of Human Health and the Environment* under the section Comparison of Alternatives needs to delete statements that ecological risk to the wetland from groundwater discharge is minimal. Ecological risk from the wetlands is yet to be determined. This section should state that Alternatives 2 and 3 do not eliminate groundwater discharge above SWQS in the adjacent wetlands.
6. I believe the Preferred Alternative on Page 8 should be Alternative 4; treatment of the groundwater prior to discharge into the surface waters of the wetlands, either through a groundwater pump-and-treat system or through a wetland treatment system.

If I can be of any further assistance with this matter, please contact me at (904) 921-9989.

Sincerely,



John W. Mitchell
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola
Gena Townsend, USEPA Region IV
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Allison Dennen, EnSafe, Memphis
Karen Atchley, Sechtel, Knoxville
Tom Moody, FDEP Northwest District
Pat Kingcade, OGC/Trustee File

Attachment

TJB



JJC



ESN

