



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

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CHARLESTON, S. C. 294 11-0068

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PLEASE ADDRESS REPLY TO THE  
COMMANDING OFFICER, NOT TO  
THE SIGNER OF THIS LETTER  
REFER TO:

5090/11

Code- 18211

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

05 NOV 1991

Mr. Jay Field  
U.S. Department of Commerce  
National Oceanic and Atmospheric Administration (NOAA)  
Hazardous Material Response Branch  
7600 Sand Point Way N.E. - Box C15700  
Seattle, Washington 98115

N00204.AR.000302

NAS PENSACOLA

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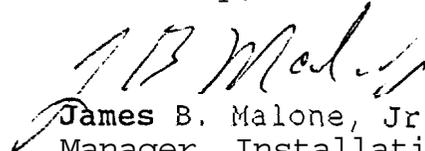
Dear Mr. Field:

Enclosed for your review are our responses to your comments on the Draft Workplans Phase I and II Report for Operable Unit 10: Group O; PSC Site 32, 33, and 35 at the Naval Air Station Pensacola, Pensacola, Florida.

We have incorporated your appropriate comments into the development of the Draft/Final Report due for submittal on December 5, 1991.

We appreciate your effort and corporation in providing review comments. 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:

Attachment A: Navy responses to NOAA comments

copy to: w/out encl:

NAS Pensacola (Mr. Ron Joyner, Code 18250)

PWC Pensacola (Mr. Greg Campbell, Code 480)

FDER (Mr. Eric Wuzie)

EPA (Ms. Allison Drew)

880000

## Attachment A

### RESPONSES TO COMMENTS FROM THE NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION

Comment 1:

The soil gas **survey** will not locate contamination by toxic elements, semi-volatile organic **compounds**, PCBs or pesticides, which may be found separately in soil and groundwater from organic compounds. Phase I soil and groundwater sampling should be performed in a systematic manner throughout the site unless current and reliable soil and groundwater data are available to determine locations of contamination.

**Response:**

There is currently no information which would indicate **where** or if significant soil contamination might be found at the Industrial Wastewater Treatment Plant (IWTP). The wastes processed by the IWTP would be expected to contain volatile organic **compounds** (VOCs) by virtue of the fact that **much** of the material is derived from solvent *cleaning* and paint stripping operations. Previous analyses of soil and **groundwater samples** also indicated the presence of VOCs. As a result, the soil gas **survey** should be an effective indicator of any areas potentially having contaminated soil and/or groundwater. Additionally, any other indications of contamination (e.g., stained soil) observed *during* the site reconnaissance or **other** field tasks will be considered and soil samples will be added as appropriate. The work plan text was modified to reflect **this**.

Comment 2:

The use of temporary wells did not provide reliable results in Phase I sampling of other sites. Unless changes are **made** in sampling and analysis procedures to address these problems, permanent wells should be installed for phase I.

**Response:**

Unless confirmatory samples collected from **permanent** wells prove otherwise, all Phase I sampling results should be regarded as reliable. The Group 0 work plan has been revised to combine Phase I and Phase II objectives, and will include the installation of permanent monitoring wells as opposed to temporary **wells**. **However**, the Navy **fails to** see the connection between sampling and analysis procedures and the type of monitoring well installed.

Comment 3:

The assumption that additional data for Group 0 sites will be provided by sampling of Sites 13 and 30 is not supported by information provided for those sites. The recommendations for Phase II sampling included with the Interim Data Reports for those sites did not provide for delineation of contamination from Group 0 sites. Planned Bayou Grande Phase II surface water and sediment sampling for Site 30 was too limited. According to the phase II Site 13 sampling **recommendations** in the Interim data Reports, contamination from the Group 0 sites should be investigated as Group 0 **sampling**. Additional **surface** water and sediment samples should be collected at Bayou Grande and **Pensacola Bay where** surface water or **groundwater** from the sites discharge, as part of Group 0 **sampling**.

**Response:**

**According** to the revised (September 1991) Group C work plan, the **Phase II investigation** of site 13 will be performed concurrently with the Group 0 work. The **proposed** work includes the collection of surface water and sediment samples adjacent to *the* Industrial Wastewater Treatment Plan (IWTP) in Pensacola Bay. The investigation of Site 30 will be later according to a different **schedule** but

includes the collection of surface and sediment water samples in Bayou Grande adjacent to the IWT. Any surface water and/or sediment contamination detected as part of either Site 13 or 30 will be incorporated into the Group 0 results. If additional sampling is required to further delineate the extent of any contamination detected it will be performed as part of either Group 0 or Site 30. A statement to that effect was added to the Group 0 work plan.

**Comment 4:**

The Phase I analysis of samples should be more extensive than planned. At a minimum, analysis of all samples should be for all TAL substances, including mercury, and PCBs. Detection limits for metals, pesticides and PCBs should be at or below the ambient water quality criteria for the protection of aquatic organisms (AWQC) for surface water and groundwater samples and ER-L concentrations (Long and Morgan, 1990) for sediment samples, in order to provide meaningful results for evaluation the potential risk to aquatic organisms.

**Response:**

As a result of combining phase I and Phase II objectives, all samples will be analyzed for the full TAL/TCL and will utilize the lowest detection limits achievable using CLP protocol.

**Comment 5:**

The effects of major storm events on surface water run-off should be considered when inspecting for surface drainage during the phase I physical reconnaissance. All drainage pathways should be included in the sampling program for Group 0 as well as the portions of Bayou Grande and Pensacola Bay near the discharge points of those drainages.

The effects of major storm events on surface water run-off will be considered. In fact, the only identified surface drainage feature on the sites is the drainage ditch south of the polishing and stabilization pads. The number of proposed surface water and sediment samples in the ditch has been increased from two to four in order to better characterize the extent of any possible contamination. Any additional surface water pathways identified will also be sampled.

**Comment 6:**

A comprehensive surface water and sediment sampling program for Bayou Grande and Pensacola Bay should be considered as a separate effort from individual site sampling programs. A comprehensive program would provide data for evaluating individual sites and interrelationships between sites, and for locating contaminant sources not previously identified. This type of program is needed to conduct an ecological assessment for the NAS Pensacola site.

**Response:**

The Navy agrees with this comment. A comprehensive surface water and sediment sampling program will be conducted at NAS Pensacola during the investigation of the Bayou Grande Area (Operable Unit [OU] 15), the NASP Wetlands (OU 16), and Pensacola Bay (OU 17).

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