



**U.S. DEPARTMENT OF
National Oceanic and**

National Ocean Service

Office of Ocean Resources Conservation and Assessment
Hazardous Materials Response and Assessment Division
Coastal Resources Coordination Branch

c/o The Institute of Wildlife and Environmental Toxicology
1 TIWET Dr.

Pendleton SC 29670

803-646-2335

803-646-2277 (fax)

thrown@hazmat.noaa.gov(internet id)

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NAS PENSACOLA

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23 May, 1994

Commanding Officer
Code 1851
SOUTHNAVFACENCOM
PO Box 190010
North Charleston SC 29419-9010

Attention: Mr. Bill Hill

Dear Mr. Hill:

Review of the subject document for Naval Air Station Pensacola, Escambia County, Pensacola, Florida was conducted by technical representatives of the Natural Resource Trustee for the National Oceanic and Atmospheric Administration (NOAA), U.S. Department. Of Commerce. The following comments are offered for your consideration.

Documents Reviewed:

1. *Draft Preliminary Site Characterization Report Site 5. NAS Pensacola, Pensacola, Florida.*

Comments:

The National Oceanic and Atmospheric Administration (NOAA) is authorized under the provisions of Section 107 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Subpart G of the National Contingency Plan (NCP) to protect natural resources under its jurisdiction against the injurious effects of hazardous substances. These comments are provided so that remediation decisions made will be protective of trust resources that are threatened or adversely affected by this site, or could be affected in the future.

The conclusion of the Report is that no further action is warranted at site 5. This conclusion is a result of the Preliminary Site Characterization assessment. This assessment is based primarily on analytical data from soil borings and groundwater analysis. In terms of environmental risk assessment however, the primary concern for this site is the low pH range found. No significant variation was found in measured pH values for the site, with the pH values ranging between 3.79 and 4.96 pH units. The pH values in this range are extremely low in terms of environmental values and further investigation should be conducted so as to determine the reason for the occurrence of such low values. These low pH values also may be the cause for the high levels of metals detected in groundwater samples.

In addition, section 9.3 on pp. 9-2 - 9-3 refers to aquifer zones as receptors. Receptors, in environmental risk assessment, are normally understood to be exposed biological units, such as



individuals or populations of plants or animals. Another word should be used to describe groundwater units.

Thank you for providing **NOAA** the opportunity to comment on this site and for keeping me apprised of ongoing activities. I will be happy to discuss any questions or comments pertaining to this review that you may have. My telephone number is **(803) 646-2335**.

Sincerely yours,



Trey Brown
Federal Facilities Coastal Resource Coordinator
NOAA, Region IV

cc: Craig Brown, Remedial Project Manager, **EPA**