



Department of Environmental Protection

32501.032
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Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

November 15, 1994

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NAS PENSACOLA
5090.3a

Mr. Bill Hill
Code 18211
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Re: Naval Air Station Pensacola, National Priority List Site,
Draft Final *Remedial Investigation Report, Operable Unit 10
and Site 13*, October 14, 1994

Dear Mr. Hill:

We have reviewed the above referenced document and offer the following comments.

1. Table 10-6 (Reference Concentrations - Shallow Groundwater) - p. 10-20

We still have concerns about the high concentrations of inorganics in the reference wells. Florida Primary Drinking Water Standards (FPDWS) were exceeded for antimony, barium, beryllium, chromium, lead, and nickel in both wells. Mercury exceeded the FPDWS in well 01GS67. The Florida Secondary Drinking Water Standards were exceeded for aluminum, iron and manganese in both reference wells. We question whether all of these levels are normal background for the aquifer. Another location may need to be established for background referencing.

2. section 12.0 (Conclusions) - p. 12-1

This section states that "additional assessment work at screening Site 13 is not required, given the low detected concentrations in soil and no risk related pathways." However, the dredge spoil area at the north end of magazine point had contaminated levels above sediment screening values in the depressions. These depressions have begun to serve as a wetland environment. Aquatic vegetation, specifically cattails, were observed in the depressions, and blue heron tracks were seen leading to and from one of the depressions during a site visit. A risk assessment is needed related to these areas.

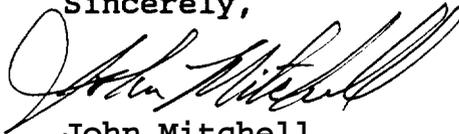
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3. Appendix N

According to the analytical tables in Appendix N, many of the detection limits were not low enough to meet the Region IV draft sediment screening values. However, the screening values are within the limit of the CLP-PQL. Also, the values for analyzed constituents listed as non-detect (U) varied. For example, antimony has a sediment screening value of 12 mg/kg yet the "U" delineator was given at sediment stations 13M61, 13M62, 13M65, and 13M66 with a value of 15.4 mg/kg, 24.4 mg/kg, 16.5 mg/kg, and 20.7 mg/kg, respectively. The screening value needs to be lower, and any non-detect values should be constant. This inconsistency occurs for the majority of the constituents analyzed. Also, the sediment screening value and CLP-PQL for volatile and semi-volatile compounds is 330 $\mu\text{g}/\text{kg}$, yet in the majority of cases, the detection limit was 440 $\mu\text{g}/\text{kg}$ or higher. These data gaps need to be corrected.

Thank you for the ability to comment. If you have any questions, please call (904) 487-2231.

Sincerely,



John Mitchell
Natural Resource Trustee Project
Manager, Office of Intergovernmental
Programs

cc: Pat Kingcade, FDEP
Eric Nuzie, FDEP
Waynon Johnson, NOAA
Jim Lee, DOI
Mike Brim, USFWS
Ron Joyner, USN
Allison Humphris, EPA
Henry Beiro, E/AH