



UNITED STATES ENVIRONMENTAL PROTECTION

REGION 4

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Commanding Officer,  
Southern Division, NAVFACENCOM  
Attn: Mr. Bill Hill (code **1851**)  
P.O. Box **190010**  
North Charleston, South Carolina **29419-9010**

**SUBJ:** Concurrence with September **1995**, Final **RI/FS** Workplan and Sampling and Analysis Plan (SAP) for Sites **40** and **42** (Bayou Grande and Pensacola Bay), Naval Air Station (NAS) Pensacola, Florida, EPA Site ID No.: **FL9170024567**.

Dear Mr. Hill:

The U.S. Environmental Protection Agency (EPA), has reviewed the above referenced Workplan, concurs with the Navy's methodology, and accepts this document as final.

The following late recommendations should be considered with respect to the ongoing RI work at Sites **40** and **42** where appropriate and do not substantially impact agreed upon methodologies nor require revision to the September **1995**, Final **RI/FS** Workplan and SAP.

Draft Final RI/FS Work Plan

Sec. **3.1**, Screening Values, p. 29: The State of Florida has a newer version of its Sediment Quality Assessment Guidelines, dated November **1994**. The newer version is being checked by the Region **4** ETAG (Ecological Technical Assistance Group) Coordinator to see whether the U.S. EPA Region **4** Waste Division Sediment Screening Values need to be modified.

Fig. 3-2, p. 42: In this conceptual model, plants and animals should be shown as separate columns under aquatic and terrestrial receptors, since some of the exposure pathways would differ (e.g., no inhalation or ingestion for aquatic plants). Also, consider using "respiration" in place of "inhalation" for aquatic animals.

See. **4.3.2**, Data Gaps, p. 56: Depending upon the assumptions and uncertainties associated with the mathematical models for bioaccumulation, the results of the modeling efforts might need to be verified through field or laboratory bioaccumulation tests (e.g., Phase III investigations).

Sec. **4.4**, p. 62:

1) Paragraph #2 seems to mix toxicity tests with bioaccumulation tests. For example, the percent lipid would be pertinent to bioaccumulation determinations but not directly applicable to toxicity tests. Also, terrestrial species might be appropriate for evaluating food chain effects but not for toxicity tests for Sites 40 and 42.

2) Since earthworms, larval midges, fathead minnows, and guppies are terrestrial or freshwater organisms, they would not be appropriate test organisms for sediment at Sites 40 and 42.

3) With respect to bioaccumulation studies, another possibility is in situ caged animal studies.

Sec. **4.5**, pp. 63-64:

1) Sentence #1 in paragraph #2, "observed" human health effects are not to be addressed in the risk assessment for human health. (Both observed and predicted effects are addressed for the ecological receptors.)

Secs. 5.2, 5.3, and 5.4: Since these sections basically repeat portions of subsections under Sections 4.3 and 4.4, comments for Sections 4.3 and 4.4 would apply here.

Sec. 5.5, p. 67: If the last sentence refers to ecological risk assessment, the framework document should be dated **1992**. Additional ecological risk assessment guidance should also be utilized (e.g., **Risk Assessment** Guidance for Superfund, Vol. II: Environmental Evaluation Manual, **Interim** Final, March **1989**).

#### Draft RI/FS Sampling and Analysis Plan

Sec. 4.2, p. 22: Recommend that TAL/TCL analyses will be done on both bulk sediment and sediment elutriates, and that the bulk sediment samples **will** be used for toxicity tests.

Sec. 4.2, p. 23: The sampling methods mentioned here are somewhat inconsistent with those mentioned in Section 4.3.1, page 51, of the Work Plan. Please check this.

Sec. 4.2, Proposed Reference Locations, p. 51: Recommend that reference locations also include some sandy areas, since some of the sampling stations for Sites 40 and 42 appear to be located in sandy areas.

Sec. 5.3.1, p. 56, and Sec 5.3.2, p. 58: Since the selection of measurement endpoints is determined by the chosen assessment endpoints, the assessment endpoints should be discussed first.

Table 5-1, p. 58: While the organisms initially chosen for toxicity analysis as presented in this table are good, organisms representing taxa other than **crustaceans** may also be considered.

Sec. 5.3.2, p. 58: One factor to consider with respect to the representative ecological receptors listed is the size of their feeding **range/home** range relative to the size of the contaminated area. It is understood that other species will also be considered.

If you have any questions please contact me (404) 347-3555, extension 6462.

Sincerely,



Jay V. Bassett,  
Remedial Project Manager,  
Federal Facilities Branch

cc: Ron Joyner, NAS Pensacola  
Henry Beiro/Brian Cladwell, Ensafe, Pensacola  
Allison Dennen, Ensafe, Memphis  
John Mitchell, FDEP