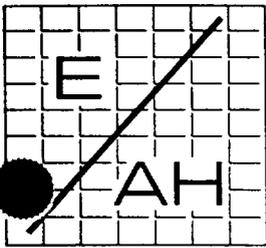


EnSafe / Allen & Hoshall

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NAS PENSACOLA
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**Program
Management
Office**

Shelby Oaks Plaza
5909 Shelby Oaks Dr.
Suite 201
Memphis, TN 38134
Phone (901) 383-9115
Fax (901) 383-1743

**EnSafe/Allen & Hoshall
Branch Offices:**

Charleston
935 Houston Northcutt Blvd.
Suite 113
Mt. Pleasant, SC 29464
Phone (803)884-0029
Fax (803)856-0107

Cincinnati
400 TechnoCenter Dr.
Suite 301
Cincinnati, OH 45150
Phone (513)248-6419
Fax (513)248-8447

Pensacola
2114 Airport Blvd
Suite 1150
Pensacola, FL 3250-1
Phone (904) 479-4595
Fax (904) 479-9120

Norfolk
303 Butler Farm Road
Suite 113
Hampton, VA 23666
Phone (804)766-9556
Fax (804)766-9558

Raleigh
5540 Centerview Drive
Suite 205
Raleigh, NC 27606
Phone (919)851-1886
Fax (919)851-4043

Nashville
311 Plus Park Blvd
Suite 130
Nashville, TN 37217
Phone (615)399-8800
Fax (615)399-7467

Dallas
Fuller Drive
Suite 326
Irving, TX 75038
Phone (214) 791-3222
Fax (214) 791-0405

March 11, 1997

U.S. EPA
ATTN: Gena Townsend
345 Courtland Street, NE
Atlanta, GA 30365

RE: Site 2 Remedial Investigation Report, NAS Pensacola
Contract #N62467-89-D-318/0059

Dear Ms. Townsend:

On behalf of the Navy, EnSafe/Allen & Hoshall is pleased to submit one copy of the response to comments for the Site 2 Remedial Investigation Report at the Naval Air Station Pensacola. These comments were previously discussed in the June 1995 partnering team meeting. If you should have any questions or need any additional information regarding this document, please do not hesitate to call me.

Sincerely,

EnSafe/Allen & Hoshall

Henry H. Beiro, P.G.
Task Order Manager

Enclosure

cc: Bill Hill, SOUTHNAVFACENCOM - 2 copies
Ron Joyner, NAS Pensacola - 2 copies
John Mitchell, FDEP - 1 copy
Denise Klimas, NOAA - 1 copy
Judeth Walker, NAS Pensacola - 1 copy
EnSafe/Allen & Hoshall File - 1 copy
EnSafe/Allen & Hoshall Library - 1 copy
EnSafe/Allen & Hoshall Pensacola - 1 copy

U.S. Environmental Protection Agency, Region IV
Technical Review and Comments
Draft Remedial Investigation, Site 2
NAS Pensacola, Florida

(Allison Humphris Comments)

COMMENT:

1. Abstract:

The text must be revised to include a more quantitative presentation of data findings in order to adequately support the proposed "No Further Action" recommendation.

RESPONSE:

This recommendation has been changed by the Partnering team and is reflected in the **12/22/96** Site 2 RI.

COMMENT:

2. Page 1-1, Section 1.0

Clarify the role of ground water contamination at Site 2.

RESPONSE:

Groundwater discharges to the bay and is diluted with seawater. The Navy requests additional clarification as to the added value this clarification would provide for a contaminated sediments study.

COMMENT:

3. Page 2-1, Section 2.1

Indicate whether Allegheny Pier is the same as Pier **303**, shown in Figure **4-3** and subsequent Site **2** figures.

RESPONSE:

This is correct, Allegheny Pier is the same as Pier **303**. The Navy agrees to make the clarifying change.

COMMENT:

4. Pages 2-1, through 2-4, Section 2.2

This section should also include reference to the contamination assessment and associated report which was completed by Ecology & Environment.

RESPONSE:

The Navy agrees to make the additional reference change.

COMMENT:

5. Page 3-13, Section 3.6

- a. While this section presents a good general discussion of the biota of Pensacola Bay, it does not present site-specific information. One of the Contamination Assessment reports for Site **2**, written by Ecology & Environment (Section 12, page **12-2**), contained some information about the biota found at Site **2**. Check the reports and include any pertinent information.
- b. Ctenophores are planktonic animals and, therefore, should not be included in the listing of benthic macroinvertebrates in paragraph **3**.

RESPONSE:

While the Navy's contractor can reference other work done at Site 2, only those organisms observed should be detailed. This section will be rewritten providing documented organisms and referenced organisms in the Site 2 vicinity.

COMMENT:

6. Page 4-5, Figure 4-1

This figure should be revised to include outfall locations, as discussed in Section 4.3.2 of the text.

RESPONSE:

A map will be provided that contains this data.

COMMENT:

7. Page 4-13, Paragraph 2

Specify the location of outfall 1 in a figure.

RESPONSE:

Outfall 1 will be located on a map and text modified to reflect the change.

COMMENT:

8. Page 5-1, Paragraph 2

Specify whether any of the field changes were significant.

RESPONSE:

Text will be modified to clarify this issue of field changes. The only field change of significance was the termination of using the split barrel sampler for a Ponar dredge due to sample recovery.

COMMENT:

9. Page 5-6, Section 5.1

Paragraph 1 states that “Offshore sampling along transects was accomplished by visual alignment of shore-based pylons, and distance to sampling points was subjectively determined.” Section 5.4, pages 5-23 to 5-24, states that a Global Positioning System was later used in determining the position (latitude and longitude?) Of the sampling locations as marked with buoys. If possible, indicate approximately how far off the actual surface water and sediment sampling locations were from the map grid locations (Figures 5-2 and 5-3).

RESPONSE:

Wind, waves, and anchor chain accuracy determined the actual location of each sampling point. The grid locations could be off by as much as 50 feet. The later use of GPS greatly reduced this error to ± 1 meter.

COMMENT:

10. Pages 5-7 through 5-9, Section 5.2.1 and Fig. 5-2

Based upon the locations of the outfalls and the ground water contaminant plume associated with Site 38, future sampling at this site must include surface water sampling closer to the shoreline (e.g., 100-foot distance) in the vicinity of Site 38.

RESPONSE:

Station I-0 was used during the Phase IIB sampling to provide this data. Sampling at the shoreline is impossible due to a 50 foot concrete toe of the seawall.

COMMENT:

11. Page 5-9, Section 5.2.2

This section states that the split-spoon/corer sediment sampling method was abandoned for the sediment contaminant assessment because **of problems** in sediment retrieval, yet Section 5.1 (page 5-6) states that the split-spoon sampler **was** used to obtain sediment samples for TOC and grain **size** analysis. Please explain.

RESPONSE:

The split barrel sampler was tried during the Phase I sampling of grain **size** and TOC. It was determined that for chemical analysis the sediment volume would need to be greater and the split barrel sampler was insufficient for this use.

COMMENT:

12. Page 5-10, Fig. 5-3

Since the reference stations were designated by **X**, rather than by transect letter, include the station numbers for the reference stations in **this** figure.

RESPONSE:

Please read the legend. A hexagon was used to denote the placement of reference stations. (See figure 5-3)

COMMENT:

13. Page 5-11, Section 5.2.3

- a. For comparison with ground water contaminant data, surface water should be sampled close to the well locations. Currently, the surface water sampling station closest to monitoring well 38GS02 is 500 feet offshore (Figure 5-2).

- b. Provide the rationale for installing and sampling the well at the southwest corner of Building **76**.

RESPONSE:

- a. Meaningful surface water collection was not possible due to wave action in the near shore environment.
- b. The wells were installed for the site **38** investigation and to reveal the groundwater quality just prior to discharge.

COMMENT:

- 14. Page 5-17, Paragraph 2

At the May 1995 Partnering meeting, it was stated that the low-flow purging method was not used to sample wells at Site **38**. Why were different groundwater sampling methods used for these two sites, when field work was conducted at about the same time?

RESPONSE:

They were not sampled at the same time. This was during the period of change over from bailers and other sampling techniques to quiescent technology.

COMMENT:

- 15. Page 5-25, Section **5.5**

In view of the migratory behavior of blue crabs in relation to mating, spawning, development/maturation, and seasonal environmental factors (such as water temperature), it is uncertain whether analytical data for edible tissues from blue crabs caught in and near Site 2 (for the human health risk assessment) would represent contaminant uptake from Site 2.

RESPONSE:

Since blue crabs are harvested in the vicinity of Site 2, the public would be interested in blue crabs as a receptor for human health risk assessment. Crabs scavenge anything edible on the bottom providing an exposure path for contaminant uptake. In addition, crabs have a simplistic liver that cannot detoxify complex organics such as PAHs. For these reasons, the Navy believes this organism is valid for this study.

COMMENT:

16. Page 5-25, Figure 5-7

This figure shows the locations of crab samples taken during the RI. The underlying assumption was made that a crab roughly a mile away would never enter Site 2, and therefore would be a candidate for being a “reference crab” against which crab samples within Site 2 could be compared. This reasoning excludes the migratory nature of crab feeding and the broad extent of its habitat within Pensacola bay. Therefore, it seems unreasonable to use a “reference crab”. This screening tool should be removed from the baseline risk assessment and all the contaminants found should be screened only against the fish ingestion risk based screening values.

RESPONSE:

The Navy agrees to make this change.

COMMENT:

17. Page 6-12, Section 6.2

- a. Since the sediment reference samples (Figure 5-3) were collected at the 1200-foot distance, add a statement about the nature of the sediments at or near these reference locations. Based upon Table 6-1 (pages 6-3 through 6-10), these sediments change from sand in the west to sand/shell in the central part to sandy clay or clay in the eastern part of the sampling grid. More specific information is also given later in Table 7-3 (page 7-9).

- b. Include information on the total organic carbon content of the reference station sediments.

RESPONSE:

- a. Section 6 provides this information, specifically in Figures 6-3 and 64 . Also see Appendix b.
- b. Section 6 provides this information, specifically in Figures 6-3 and 64 . Also see Appendix b.

COMMENT:

18. Page 7-1, Section 7.1

Contrary to the first sentence in this section, metals (e.g. silver, zinc) were detected in surface water samples, per Appendix A. Please check this and revise the text as needed.

RESPONSE:

The text was changed in the 12/22/96 version of the Site 2 remedial investigation report.

COMMENT:

19. Pages 7-1 through 7-18, Section 7.2

This section tends to discuss elevated levels of contaminants in relation to factors such as stormwater runoff and boat maintenance, while including little mention of past discharges of industrial wastes and potential inputs via ground water discharge of contaminants from land-based sites. Expand this section to address these points.

RESPONSE:

Boat maintenance in the area of the boat slip and stormwater runoff at Site 2 have been the primary contaminant inputs for 17 years. Nonetheless, the Navy agrees to expand this section to include historical and groundwater discharge discussions.

COMMENT:

20. Page 7-16, Section 7.2

The quantitation limits for many of the PAH analyses for sediments greatly exceeded the sediment screening values for PAHs, which are based upon the contract required quantitation limits. Address this point. Also, evaluate how this problem may impact Tier 1's ability to make remedial decisions using this data.

RESPONSE:

This data cannot be used for decision making, except to say, the matrix is difficult to analyze. The Phase IIB sampling did address some of these problems by requiring the laboratory to provide lower detection limits. In most cases the laboratory was able to provide data, solving this problem, but as can be seen from the Site 42 data, in areas where natural organics are present due to sea life, the matrix interferences combined with the effects of moisture content in the sediment made a laboratory determination impossible. Section 8 is a more appropriate place to discuss laboratory problems and will be expanded to meet these concerns.

COMMENT:

21. Page 7-18, Section 7.2

In view of the elevated levels of contaminants found along transect H (particularly station H1), additional sediment samples must be collected from transects I and J for chemical analysis to fill in the data gap between transects H and K. Transects I and J, like transect H, are located near Site 38.

RESPONSE:

The Navy disagrees that the expensive sampling effort and delay for additional sampling along transect I and J are needed. The Navy believes the extensive grid used to map the bottom type and total organic carbon at Site 2 combined with the data at hand from Phase IIB and transects H and K allow the nature and extent to be assessed. The assessment is based on the correlation between fine grain sediments and contaminants found. The few exceptions can be noted to this, I-0 and H-1, were silty sands not pure sand.

COMMENT:

22. Pages 9-1 through 9-7, Section 9

This section tends to make statements and draw conclusions about Site 2 based on general scientific knowledge and principles (e.g. page 9-6, paragraphs 2 and 3). Greater support for the applicability of these conclusions and statements to Site 2, in the form of site-specific data and information, is needed.

RESPONSE:

The Navy understands general scientific knowledge and principles. Additional guidance with references is requested to provide the “greater support”.

COMMENT:

23. Page 9-7, Paragraph 1

The section mentions petroleum contaminants, yet petroleum data are not discussed in Section 7.2, pages 7-16 to 7-17. Clarify this point.

RESPONSE:

Some of the PAHs found on site are derivatives or combustion by-products of petroleum. The text should be changed to clarify the “petroleum related contaminants”.

COMMENT:

24. Page 10-4, Paragraph 2

The text states that the USEPA' Framework document (for ecological risk assessment) was the basis for the outline, yet this risk assessment is missing sections on the selection of ecological Chemicals of Potential Concern (including a table showing the chemicals detected, frequency of detection, range of concentrations, mean reference/background concentrations, etc.), Exposure Assessment, and Risk Characterization. The text must be modified to include these sections.

RESPONSE:

The text in the 12/22/96 Site 2 remedial investigation does include this information, but not in this exact format. For example, exposure assessment is covered under Phase IIA Preliminary Risk Characterization and Phase IIB results. Risk characterization is its own section. Table 10-1 offers the information requested for COPCs.

COMMENT:

25. Page 10-4, Section 10.2.1

Include a figure showing the conceptual site model (i.e. sources, migration pathways into the different media, exposure pathways and ecological receptors).

RESPONSE:

The graphical conceptual model is not currently provided in the 12/22/96 Site 2 RI. The Navy agrees to make the change adding the figure.

COMMENT:

26. Page 10-5, Section 10.2.2

Delete the word "proposed" in reference to the USEPA Region IV Waste Division sediment screening values.

RESPONSE:

At the time, the **SSVs** were proposed. The **12/22/96 Site 2 RI** does not reference the **SSVs** as proposed.

COMMENT:

27. Page **10-6**, Section **10.2.2**

The potential for ground water contaminants (e.g., from Site **38**) to discharge to the Bay at Site **2** at levels of ecological concern must also be evaluated. This *can* be done through a comparison of the ground water contaminant concentrations to surface water standards/screening numbers, as a worst-case scenario.

RESPONSE:

The Navy agrees to make the change by providing tables in an appendix exhibiting Site **38** groundwater data compared to all surface water and drinking water standards.

COMMENT:

28. Page 10-7, Section 10.2.2.2

- a. The locations of the sediment samples **from** the NOAA-FDEP Pensacola Bay study are not given, so it is not known whether they represent background conditions or conditions related to particular sources (e.g. point sources). The data should not be used for comparison with Site **2** data unless this information is also presented. Additionally, the purpose of sampling reference stations for Site **2** was to provide information on background conditions in the vicinity of Site 2.
- b. Check with FDEP on the appropriate use of the FDEP metal-to-alumhum ratio for this site.

RESPONSE:

At the time of publishing the draft **RI** for Site **2**, the Navy was not able to determine the FDEP sampling locations. The Navy agrees to make the change if these locations can be verified.

COMMENT:

29. Page 10-8, Section **10.2.2.2**

- a. Include a figure showing the location of NOAA station **1** in relation to Site **2**. If available, include information on water column depth and particle size distribution at NOAA station **1**.
- b. The screening level approach **based** upon the USEPA Region **III** Interim Ecological Risk Assessment Guidelines is basically similar to the USEPA Region **IV** Waste Division approach. Region **IV** compares the maximum concentration or the **95%** UCL (whichever is lower) to the available screening value. (This follows the approach used for human health, as described in Section 10.3.4.4 of this **RI** (pp. 10-45 and 10-48). Exceedance of a screening value indicates a potential for ecological effects and a need for further evaluation (e.g. spatial distribution of detections, number of contaminants exceeding screening values, magnitude of the exceedances, etc.) And possibly site-specific ecological investigations or tests, as planned for Phase **IIB**.
- c. See Section 10.3.4.4, pages 10-48 and 10-50, concerning the approach for nondetect values.

RESPONSE:

- a. The Navy agrees to make the change if the data is available.
- b. Phase **IIB** sampling was accomplished and documented in the **12/22/96** Site **RI**.
- c. **As** agreed in the **2/97** Partnering meeting, all non-detects will be handled by using $\frac{1}{2}$ the CRQL for CLP data.

COMMENT:

30. Pages 10-13 through 10-15, Section 10.2.2.3

The discussion of “natural” concentrations of metals in sediments is valid yet somewhat misleading. It is possible that some natural levels of metals could have an adverse effect on ecological receptors. However, background levels of chemicals in the present study were to be addressed through sampling appropriate background or reference locations. Site 2 data should be compared to the Site 2 reference data, prior to comparison with any other Pensacola Bay data.

RESPONSE:

At the time of the draft RI, reference locations were not agreed upon by the Partnering team in the sampling and analysis plan. Since that time numerous locations have been sampled during the site 42 investigation that could be used for a reference or “background” comparison, if agreed by the Partnering team.

COMMENT:

31. Page 10-20, Section 10.2.2.3

The statement concerning “The extremely limited use of portions of the bay near and within Site 2 by sensitive estuarine life stages” is unsupported. Give the basis for the statement.

RESPONSE:

This statement will be changed as follows: “Based on field observations, the extremely limited use of portions of the bay near and within Site 2 by sensitive estuarine life stages does not”.

COMMENT:

32. Page 10-27, Section 10.2.2.4

As mentioned above, the quantitation limits for many of the PAHs in sediment samples greatly exceed the contract required quantitation limits (Appendix **A**), which are also the Region **IV** sediment screening values. This can be addressed through following the procedure for nondetects mentioned above, or possibly by modifying laboratory procedures to obtain low quantitation limits.

RESPONSE:

As agreed in Partnering meeting nondetects will be handled by using $\frac{1}{2}$ the CRQL for CLP methods. The text will be reviewed for the necessary specific changes.

COMMENT:

33. Pages 10-27 through 10-30, Section 10.2.2.4

Discuss organic contaminants in relation to past operations at Site 38 and other land-based sites with surface water or ground water discharges to Site **2**.

RESPONSE:

This comment is noted, however this information was discussed in Section **4** extensively and in other sections.

COMMENT:

34. Page 10-30, Section **10.2.2.4**

This section questions the usefulness of “sandy reference locations” for comparison with Site **2** sediment pesticides data, yet the station (M2) having the highest total DDT concentration has sandy sediment. Clarify this point.

RESPONSE:

The Navy agrees this point is not clear and should be clarified. The purpose of this discussion is to be sure sediments are compared based on total organic content and grain size.

COMMENT:

35. Page 10-31, Section 10.2.3

- a. Once the comments given above are addressed, modify this section accordingly.
- b. Based upon the comments given above, risk to ecological receptors at Site 2 has not yet been determined. Based upon the **exceedances** of sediment screening values for multiple contaminants at many Site 2 sampling locations (particularly in the northeast portion), the magnitude of the **exceedances**, and the uncertainty concerning potentially affected receptors, Phase IIB (benthic macro invertebrate analysis and toxicity testing) must be conducted.
- c. The text predicts a decline in contaminant levels once contaminant sources are removed from the Base. However, much of the contaminant migration into Site 2 took place while the land-based facilities were actively discharging wastes into the Bay. Those discharges apparently stopped in 1973 (Section 2.2, page 2-1), yet Site 2 still contains related contaminants at levels of ecological concern. Please revise the text as needed. Historic levels could be traced by chemically analyzing sediment core intervals in the depositional areas, though this would not necessarily add to the evaluation of ecological risk.
- d. While it is true that "physical variability of the system" **can** reconfigure the bottom sediments, it has still been over 20 years since the discharges stopped. Based upon the brief description of surface water hydrological conditions at Site 2 (Section 6.2, page 6-12), it appears that the depositional areas within Site 2 will remain depositional, lower-energy areas unless the shoreline configuration changes.

RESPONSE:

- a. These sections have been changed extensively in the 12/22/96 version of the Site RI to include this information.
- b. Phase IIB sampling was conducted and reflected in the 12/22/96 Site 2 RI.
- c. The value of core analysis is unclear and should be explained further relative to a feasibility study and the specific function of this environment that would be protected by remediation.
- d. The Navy agrees, but is uncertain what is being requested.

COMMENT:

36. Pages 10-32 through 10-34, Section 10.2.5

Once the comments given above have been addressed, revise this section accordingly.

RESPONSE:

These sections have been changed extensively in the 12/22/96 version of the Site RI to include this information.

COMMENT:

37. Page 10-39, Paragraph 3

Specify that the twice background rule *only applies to inorganic chemicals* and may not be used to screen organics, as it is assumed that most organic chemicals found at hazardous waste sites are produced through human activities.

RESPONSE:

The Navy disagrees that “twice background only applies to inorganic chemicals”. The purpose of using background or a reference ~~data~~ is not to evaluate what is natural in the environment but what we can measure ~~as~~ an anthropogenic addition. If aldrin, or its sister endrin, are found to be ubiquitous in similar bay sediments, then the Navy cannot substantiate to the public attributing Aldrin or Endrin to Site 2. **Any** chemical which the Navy believes it can substantiate as ubiquitous to this environment, will be treated as “background”.

COMMENT:

38. Page 10-40, Section 10.3.3.5

The reference to “tissue ingestion **RBCs**” should be changed to reflect that the values used from the Region III **RBC** table are *fish ingestion RBCs*. This change will facilitate the reader’s identification of the appropriate screening values.

RESPONSE:

The Navy agrees to replace “tissue” for “fish”

COMMENT:

39. Page 10-41, Table 10-4

The fish ingestion screening value for mercury is 0.041, not 0.41. Also Aldrin should not be screened based on comparison with screening concentrations, since organic chemicals are only appropriately screened against risk based screening values, not background concentrations.

RESPONSE:

This table has been replaced in the 12/22/96 Site 2 RI.

COMMENT:

40. Pages 10-52 through 10-53, Figure 10-9

All of the equations need to be reformatted so as to appear in the correct place on the page.

RESPONSE:

Figure reformatted in the 12/22/96 Site 2 RI.

COMMENT:

41. Page 10-55, Paragraph 4

The USEPA Region III RBC Tables should not be used as a source of toxicological values. IRIS, HEAST, and ECAO are the only sources that should be referenced for toxicity values.

RESPONSE:

The text clearly states IRIS, HEAST, and ECAO are considered primary and secondary sources for this information. The text also states the RBC tables are used in lieu of any primary or secondary source information on these contaminants,

COMMENT:

42. Page 10-56, Paragraph 1

"USEPA Region IV" should not be used as rationale for inclusion of toxicological profiles. RAGS part A Section 7.7.1 (not Region IV guidance) indicates that a short description of the toxic effects of each chemical carried through the risk assessment should be presented in the main body of the text in non-technical language.

RESPONSE:

Published or unpublished guidance will be referenced by the Navy in remedial investigation reports. This provides the public with the rationale for Navy actions and decisions. The Navy will be glad to include the additional reference provided.

COMMENT:

43. Page 10-57, Table 10-8

This table should include modifying factors where appropriate and a column for listing critical effects of each chemical, as specified in RAGS part A Section 7.7.1.

RESPONSE:

The Navy agrees to clarifying the modifying factors. In accordance with RAGS part **A**, section 7.7.1.

COMMENT:

44. Pages 10-62 through 10-71, Section 10.3.7

The Risk Uncertainty section should not be used as “general comments” sections but should stick to the point, answering such questions as: “What are the uncertainties introduced in the final assessment of risk?”, and “Do they tend to overestimate or underestimate the risk or hazard involved?”

RESPONSE:

Though the section does begin with a “General” subtitle and discussion, the section contains subsections on the uncertainty associated with risk based screening, comparison to reference concentrations, quality of the data, characterization exposure setting and identification of exposure pathways, determination of exposure concentration, and toxicity assessment information. If requested, the Navy can provide an additional section answering these sections. In accordance with provided guidance, the assumptions are numerous and the risk is excessively over estimated.

COMMENT:

45. Page 10-63, Table 10-9

The chronic daily intakes for each chemical should be included **in** these tables to aid the reader in calculating hazard quotients and cancer **risks**.

RESPONSE:

The tables submitted were developed in accordance with **RAGS**. Chronic daily intake was included in previous risk assessments prepared for NAS Pensacola. The EPA Region IV reviewer required them to be removed, claiming chronic daily intake “distracts from the risk.” This comment is the first indication that USEPA’s preferences regarding risk characterization tables

have changed and future submissions will be modified accordingly to suit USEPA's preferences. Tables showing only chronic daily intake will be omitted from future submissions, despite the submissions not appearing identical to examples shown in **RAGS**. Based on this comment, chronic daily intake will only be presented in the risk characterization section of future submissions, because the information would otherwise be presented twice.