

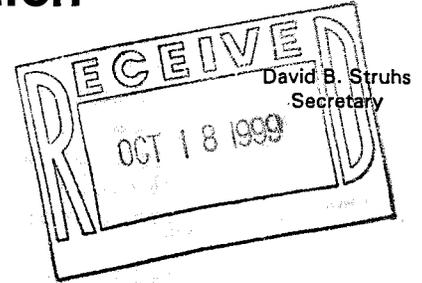


Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

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October 14, 1999

N00204.AR.001838

NAS PENSACOLA

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Mr. Bill Hill  
Code 1851  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Draft Technical Memorandum, Development of Remedial Goals, Site 2 (Waterfront Sediments), NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated September 16, 1999 (received September 17, 1999). I have the following comments that should be addressed in the final document.

1. Page 15, Last Sentence before Table 4: This sentence states that the mysid bioassay results reveal mortality levels at 34 to 49%, indicating that the bioavailability of the COC may be limited. These mortality levels are significant and indicate adverse effects to mysids either from the COCs or other unknown chemicals. It is possible that unmeasured toxic chemicals are causing degradation at Station Q2; however, the other stations may be impacted by the COCs. It is not correct to conclude that the COCs have limited bioavailability. This would only be possible if the sediment chemistry data were to indicate the presence of COCs without having adverse effects to growth, mortality, or diversity to the benthic organisms.
2. Page 18, Section 4.1, Remedial Goals: The use of one data point, which represents the highest no effects level, is not appropriate for determining the remedial goals. The amount of data is limited (only 11 samples). In addition, during my review of the data, I noted many of the samples exhibited adverse effects at concentrations below the highest no effects level.

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Mr. Bill Hill  
Page Two  
October 14, 1999

3. Appendix C: The graphs for Mercury and BEHP were not included in the appendix. In addition, the data presented in the graphs did not clearly establish an appropriate no effects level for any of the COCs. Clearly, more data **is** required to establish remedial goals for this site.
4. Page 21: I believe it is significant that BEHP was detected at Site 38, the terrestrial site adjacent to Site 2, and that present day concentrations may represent a portion of the chemical that was not leached and transported **off** site.

A no further action (NFA) recommendation is inappropriate at this time. The Team had previously decided by consensus to obtain additional data for Site 2. I acknowledge your proposal by electronic mail to the Team on October 13 to obtain additional funding for the collection of benthic diversity and toxicity data in conjunction with the sediment chemistry data proposed in the Post RI Sampling and Analysis Plan for Site 2 dated August 17, 1999. I recommend that remedial goal evaluation be deferred until the additional data can be reviewed.

If I can be of any further assistance with this matter, please contact me at (850) 921-9989.

Sincerely,

*Joseph F. Fugitt*

Joseph F. Fugitt, P.G.  
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola  
Gena Townsend, USEPA Region IV  
Brian Caldwell, EnSafe, Knoxville  
Allison Harris, EnSafe, Memphis  
Tom Dillon, NOAA, USEPA, Region IV  
Tom Lubozynski, FDEP Northwest District

TJB

*TJB*

JJC

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