



## Department of Environmental Protection

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Governor

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2600 Blair Stone Road  
Tallahassee, Florida 32399.2400

David B. Struhs  
Secretary

September 14, 2000

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: Final Remedial ~~Investigation Report~~ Errata Pages and  
Response to Comments, Site 40, NAS Pensacola

Dear Mr. Hill:

I have **completed** the technical review of the above referenced document dated April 21, 2000 (received **April 25, 2000**). **Most of** the comments were addressed adequately in the response summary and in the errata pages. The new figures submitted in the errata **present** the information very well. I have a minor comment that should be addressed as replacement page in the document.

**Page 11-5, AZ-2, Nature and Extent:** Please correct the site names discussed in this section. **Site 8 is** the Rifle Range Disposal Area and **Site 24 is** the DDT Mixing Area.

In addition I have several general comments below that **must be addressed** before I can support a no further action decision at Site 40.

Section 11.1, Page 11-4: The Navy recommends no further action for AZ-1 based on the distribution of contamination, lack of toxicity, and indicators of a healthy environment for community analysis. Based on my review of the data, it is not clear to me that this is an **appropriate** course of action. Figure 7-6, Nature and Extent of Mercury indicate an area of sediment contamination that is apparently coming from NAS Pensacola. **HQs for: Mercury** were greater than 1 **for** this area and as high as 40.

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The **benthic community** may be diverse and very **happy** in this area; however, there is **still** some **uncertainty** concerning how "healthy" this environment is to other organisms. Tissue **from** forage fish or other **appropriate** organisms were **not** collected and analyzed for Mercury. A model for **predicting** the **uptake** of Mercury in upper level fish presents a risk for **most** of the model **assumptions**. This risk is only reduced somewhat by creatively **tweaking** the **variables** into this model. The **question** remains : unanswered whether or not Mercury is occurring in fish tissue. The pathway to the subsistence or recreational **fisher** is questioned also in the document; however, there is still a pathway.

I understand the position of the Navy not to sample fish tissue from **game** fish like the Red Drum because **it** may increase uncertainty in the evaluation of risk due to their home range. With that in mind, I would **recommend** a different approach by collecting forage fish or other **appropriate** organisms having a limited home range in the area exhibiting Mercury in the sediment and analyzing the tissue for Mercury.

The recommendation by the Navy for no further investigation of the four assessment zones associated with Site 40 is under consideration. Due to present day activities from NAS Pensacola potentially **contributing** to sediment contamination at Site 40, I recommend that the Navy prepare to transfer this site to a pollution prevention (P2) program.

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 4  
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