



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY**

REGION 4

**SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303**

January 14, 2002

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: Draft Remedial Investigation Addendum
Operable Unit 3, Site 2
Naval Air Station Pensacola
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has completed its review of the above subject document. Enclosed are the comments as discussed in our meeting on January 8th.

If you have any questions, please contact me at (404) 562-8538.

Sincerely,

A handwritten signature in cursive script that reads "Gena D. Townsend".

Gena D. Townsend
Senior Project Manager
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS Pensacola
Allison Harris, Ensafe, Memphis
Tracie Vaught, FDEP

Comments

1. Page 1-2, Fourth Paragraph - The information contained in this report validates the conclusions of the previous RI to conduct a feasibility study to provide the information for the proper selection of the appropriate remedial action for this site.
2. Page 2-2, Figure 2-1 Map showing the 150' X 150' Sampling Grids for this Investigation - Identify the sample grids by the code used in the text (e.g., EF-45).
3. Page 3-1, 3.1.1 Field Chemistry Results - The comparison of maximum values from the previous study to the results of the composite samples in the present study may overemphasize the differences in the contaminant concentrations when the composite sample value (which may represent an average value for an area) is lower than the previous maximum value. This comparison may also underemphasize the differences in the contaminant concentrations when the composite sample value is greater than the previous maximum value.
4. Page 3-22, 3.2.5 Benthic Community Results, First Paragraph - The mixture of pollution tolerant and pollution sensitive organisms may be due to the sample collection occurring during a recruitment period (samples were collected in March) of the benthic community seasonal cycle.
5. Page 4-3, 4.2.1 Interpretation of Biological Endpoints to the Triad - The "non-normalized" toxicity test information should be incorporated into a redrafted decision making triad table.
6. Page 4-12, 4.4.3 Station GH-12 - How can the SEM/AS ratio be above 1 but the SEM-AVS value be below 0.0?
7. Page 5-1, 5.0 Conclusions and Recommendations - Sub-lethal effects are appropriate endpoints for remedial ecological risk assessments. The evidence appears to contradict the second paragraph.