

**Navy Response to USEPA Comments on Draft Remedial
Investigation Report Addendum Site 2 Waterfront Sediments,
NAS Pensacola
April 19, 2002**

Comments received 7 January 20 02

Comment 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.

Response 1:

The purpose of this study was to discern if conditions adverse to benthic communities in Pensacola Bay Site 2 area exist today (2000). The original RI Report was completed June 1997. Following the RI, an FS was completed and finalized in September 1997. During the public comment period (8 Dec 97 to 22 Jan 98), a comment was received questioning the preferred alternative. The comment suggested that the Navy should do something or do nothing at the site. Since the regional area had been directly impacted by three hurricanes after the original study, the Partnering Team agreed to reevaluate the current conditions. The multiple lines of evidence gathered during the investigation of Site 2 indicate that the area is recovering from past Naval Base activities.

Comment 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).

Response 2:

Agreed. Figure 2-1 will be updated to include station decision unit identifications.

Comment 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 values (which may represent an average value for an area) is lower than the previous maximum value. This comparison may also under emphasize 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 under emphasize the differences in the contaminant concentrations when the composite sample value is greater than the previous maximum value.

Response 3:

Agreed. Comparisons between the two sampling events have been deleted. Instead, 2000 sediment data will be compared to the reference concentration (developed for the study), and the lower of sediment screening values (USEPA Region IV or FDEP) for sediment benchmark comparisons. Table 3-1 shows the surface sediment chemistry and Table 3-2 shows the subsurface chemistry,

each of which compare the constituents to the reference location and the sediment benchmark values.

Comment 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.

Response 4:

The Tier 1 members and the eco-sub group labored for over one year finalizing the details of the study plan, and received buy-in from all members (Tier 1, eco-group, and even a Tier 2 representative). The sampling schedule determined by USEPA was conducted at their earliest convenience (March).

The purpose of the diversity sampling was not to conduct an in-depth benthic community assessment as that would require seasonal, if not monthly, sampling over a series of years. The intent of the Pensacola Site 2 sampling was to provide a snap shot of the organisms currently making up the benthos. In addition, the information collected is included in the weight of evidence approach which utilizes the sediment quality triad approach (species diversity, toxicity tests, and chemical analyses) to address the original question, 'Are conditions adverse to benthic communities in Pensacola Bay Site 2 area in existence today (2000)?'

Benthic community from the Site 2 area will be compared to the reference stations (18 and 22) as agreed upon in the DQO document.

Comment 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.

Response 5:

Agreed. Non-normalized data will be presented throughout the report.

Comment 6:

Page 4-12, 4.4.3 Station GH-12 - How can the SEM/AVS ratio be above 1 but the SEM-AVS value be below 0.0?

Response 6:

Table 4-6 shows the SEM-AVS for Station GH-12 is 0.095. This will be corrected in 4.4.3, the narrative portion of this decision unit, in the document.

Comment 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.

Response 7:

The Navy will address uncertainties identified by reviewers of the document to better support earlier conclusions. The sublethal endpoints are included in the evaluation of site conditions and have been evaluated using the criteria established in the approved DQO document (Appendix A).