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July 9, 2003

U.S. Environmental Protection Agency
Attn: Ms. Gena Townsend and Mr. Greg Fraley
Atlanta Federal Center
100 Alabama Street SW
Atlanta, Georgia 30303-3104

Re: Site 2, Operable Unit 3, NAS Pensacola
Contract # N62467-89-D-0318/059

Dear Ms. Townsend and Mr. Fraley:

On behalf of the Navy, EnSafe Inc. is pleased to submit two copies of the response to comments on the Final Remedial Investigation Report Addendum, Site 2 Waterfront Sediments for the Naval Air Station Pensacola. Included are responses to EPA, FDEP, University of Florida, and NOAA comments.

If you should have any questions or need any additional information regarding the responses, please do not hesitate to call me.

Sincerely,
EnSafe Inc.

Allison L. Harris
Task Order Manager

Enclosure

cc: ES31 Mr. Bill Hill SOUTHNAVFACENGCOM without enclosure
Greg Campbell, NAS Pensacola – 3 copies
Tom Dillon, NOAA – 1 copy
EnSafe Inc. file – 1 copy
EnSafe Inc. Pensacola – 1 copy
EnSafe Inc. Knoxville – 1 copy
EnSafe Inc. Library – 1 copy
Administrative Record

Navy Response to USEPA Comments (April 30, 2003)
Final Remedial Investigation Report Addendum
Site 2 (Operable Unit 3) Waterfront Sediments, NAS Pensacola
July 9, 2003

Comment 1:
The conclusion section in this report states, "the multiple lines of evidence gathered during the investigation of Site 2 concluded that the area is recovering from past Naval Base Activities". Although the data may demonstrate that there is change in site conditions, it does not necessarily support a recovering effect.

Response:
The Navy had based their conclusions on the data presented (chemical analyses, toxicological exposures using two sensitive invertebrate species, and a benthic community survey). Table 4-8 summarizes the study results as agreed by the Partnering Team and captured in the DQO Process. Table 4-12 presents a weight of evidence table which also provides ancillary information to enhance the data and the Navy's conclusions. Toxicological exposures and benthic community surveys conducted in 1996 demonstrated signs of a degraded environment, whereas similar studies utilizing more sensitive species in 2000 demonstrated a healthy diverse community, which was interpreted as an improvement.

Comment 2:
The contaminants appear to have shifted over time from natural phenomena or normal dispersion; this would support a change in site conditions more so than a recovering effect.

Response:
The Navy, as a member of the Partnering Team, chose the Site 2 study location based in part on Phase IIB chronic toxicity test data collected in 1996. Sediments, especially those found at Site 2, are known to be in a dynamic (ever changing) system and can be expected to behave in response to weather and wave related conditions. The Partnering Team discussed at length the obvious weather conditions (three named hurricanes, and several winter storms) and the concept that sediments may have shifted. The concept of attenuation was also briefly discussed. The Team unanimously agreed to conduct their investigation based on the data collected during Phase IIB, and to concentrate their efforts in areas exhibiting HI values greater that 10. The problem statement agreed upon by the Team was, "Are chemicals in the Site 2 sediments creating a condition adverse to benthic communities?" Utilizing the DQO Process, the 2000 Site 2 Investigation developed an approach to answer this question.

Comment 3:
Additionally, the comparison of data from the two different sampling events can be performed on a generalized basis, it cannot be performed as an exact comparison.

Response:
The Navy agreed that direct comparison would not be applicable and removed direct comparisons between the 1996 and 2000 data. However, a summary of the 1996 data is provided in Section 1 as part of the rationale for the 2000 study.

Comment 4:
The last sampling event used the DQO process as a design standard which produced a more comprehensive sampling scheme then the initial sampling event. However, the data does not support the present day conditions of the site and a decision can be made in the next step.

Response:
An FS will be completed to evaluate appropriate alternatives.

Comment 5:
Figure 4-1, "Decision Flow for Each Decision Unit" states, if condition "1" or "6" of the triad exist in the top 6" of sediment, declare unacceptable condition, calculate remedial goal objectives and go to FS. The document identifies two decision units (DU) that demonstrate condition "6", CD-23 and EF-45. Also, NOAA's comments, EF-23 may be an additional area of concern. The next step in the process would be to calculate a remedial goal and proceed to an FS to evaluate alternatives.

Response:
Agreed, the Navy will develop a Feasibility Study to evaluate alternatives. Decision Unit EF-23 will not be included in the FS because when data was applied to the SQT, Condition 3 was interpreted as contaminants are not bioavailable.

Comment 6:
Keep in mind, a physical action will not necessarily be required, however, all alternatives should be evaluated and the most appropriate alternative selected.

Response:
The Navy agrees. The FS will evaluate all feasible remedial alternatives for the site, including a no-action alternative.

Editorial Comment # 1: Page 1-4, 2nd paragraph, 6th sentence is incomplete

Response:
Noted. The sentence should read: "HQs are produced by dividing the detected concentration by the sediment screening value (SSV) for that constituent."

Editorial Comment # 2: Page 4-19, 5th paragraph, last sentence - Tables 3-10 and 3-11 should be 3-8 and 3-9.

Response:
Agreed, the sentence will be revised.