N00204.AR.002412
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LETTER AND COMMENTS FROM U S NAVY IN RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTIONS COMMENTS TO FINAL REMEDIAL INVESTIGATION REPORT SITE 41 NAS PENSACOLA FL
4/9/2001
NAS PENSACOLA

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Response to FDEP Comments
Final Remedial Investigation Report
Site 41 (Operable Unit 16), NAS Pensacola Wetlands
NAS Pensacola
Dated April 9, 2001

General Comments, Volume I and II

FDEP Comment 1:

Section 4.5, Deviations from the site 41 SAP Addendum: It is indicated in this section that due to a sampling error, mercury was not included in the analysis of the fish tissue samples. Since the submission of the draft report, a mercury model has been utilized to estimate mercury in upper trophic fish based on observed sediment concentrations. Since mercury was detected in sediment samples collected in a number of the wetlands, fish tissue samples should be collected and analyzed for mercury in order to reduce the uncertainty in the human health risk assessment.

Response:

The Navy recognized the data gap and collected sediment and fish at Wetland 64 in 2001. These data were incorporated into a food chain model (FCM). The FCM discussed in the final RI should address these concerns.

FDEP Comment 2:

Table 6-2, Site 41 Sediment Inorganic Reference Concentrations: Analytical results on this table should be reported in mg/kg (see Volume III, Appendix A) and not µg/L since these are sediment samples.

Response:

The units have been corrected in the Final Site 41 RI Report.

FDEP Comment 3:

Table 6-3, Site 41 Fresh Surface Water Inorganic Concentrations: The freshwater Surface Water Criteria for Aluminum is 13 µg/L based on toxicity (Table 1, Chapter 62-777, Florida Administrative Code [FAC]).

Response:

Noted and corrected in the Final Site 41 RI Report.

FDEP Comment 4:

Table 6-4, Site 41 Salt Surface Water Inorganic Concentrations: The marine Surface Water Criteria for Aluminum is 13 µg/L based on toxicity (Table 1, Chapter 62-777, Florida Administrative Code [FAC]). The FDEP Criteria of 1500 µg/L, published in Chapter 62-302.503, Parameter (2) Aluminum, is modified later in Chapter 62-302.530, Parameter (62) Substances in concentrations which injure, are chronically toxic to, or produce adverse physiological or behavioral response in humans, plants or animals.

Response:

The aluminum criteria is 13 µg/L for freshwater surface water based on toxicity.

FDEP Comment 5:
Figure 7-1, Wetland Functional Use Assessment: Why is a variable condition indicated for mammals at Wetland 18 but not for the other wetlands on this table?

Response:
An operable unit 1 wide food chain model is used to assess potential risk to mammals, predatory fish and predatory birds.

FDEP Comment 6:
Page 7-27, Great Blue Heron Food Chain Model: This section presents calculations of site foraging factors (SFF) for the Great Blue Heron. In addition to the Great Blue Heron, a number of piscivorous birds have been observed in the NAS Pensacola Wetlands (e.g. Little Blue Heron, Belted Kingfisher, and Tricolored Heron). Has any comparison been made to these species and their respective foraging ranges?

Response:
Each operable unit grouping of wetlands is evaluated using food chain models to better assess impacts from the contaminants detected to the fish-eating birds, fish and mammals.

FDEP Comment 7:
Page 7-32: This page is presented twice in the report.

Response:
Noted and corrected in the Final Site 41 RI Report.

FDEP Comment 8:
Figure 8-1, Conceptual Surface Water Migration Pathways: The figure presents the conceptual model for surface water migration pathways between many of the wetland and is of great value to the reviewer. Why isn't a similar figure available in the report presenting a conceptual groundwater migration pathway?

Response:
The Final Site 41 RI Report has been reorganized and reformatted to present the information in a clearer format. Wetlands are now grouped by their association with identified terrestrial sites. Fate and transport analysis evaluates the groundwater to wetlands media pathway as well as the storm water to wetlands media pathway.

FDEP Comment 9:
Section 8.3.4.1, Screening Comparisons, Sediment and Surface Water Data, Page 8-14: It is stated that concentrations of lead reported in surface water were compared to 15 µg/L, the treatment technique action level. For wetland located adjacent to marine surface water, a comparison should be made the marine surface water criteria of 5.6 (Chapter 62-302.530, FAC).

Response:
Marine surface water has been compared to the marine surface water criteria of 8.5 µg/L (Chapter 62-777).

FDEP Comment 7:
Pages 8-16 and 8-17: Tables 8.3-4 and 8.3-5 should be corrected to 8-4 and 8-5 as indicated in the List of Tables and in the text.

Response:
The HHRA methods section has been re-written for the final RI report. This comment is no longer applicable.

FDEP Comment 8:
Section 10.1.5.5 states that no surface water data were available and no COPCs were identified. What data is presented in Table 10-1-12 then?

Response:
No surface water samples were collected from Wetland 64 during Phase II sampling. Two samples were collected during the Phase III sampling effort, and this is what is presented.

FDEP Comment 9:
Section 10.2.5.7, Remedial Goal Options: This section is printed twice in the report.

Response:
Noted and corrected in the Final Site 41 RI Report.

FDEP Comment 10:
Page 10-3-2: The text discusses DDT and alpha-chlordane results for a sediment sample collected at location 0103. A comparison with Figure 10-3-1 and Table 10-3-2 indicate that this is possibly location 0303. This location should be verified and corrected if necessary.

Response:
Noted and corrected in the Final Site 41 RI Report.

FDEP Comment 11:
Page 10-9-21, Section 10.9.6, Conclusions and Recommendations: This section is missing from the report.

Response:
Noted and corrected in the Final Site 41 RI Report.

Site Specific Comments, Volume II
Section 10, Wetland 64
FDEP Comment:
Toxicity data indicate some mortality for amphipods but a higher survivability for polycheates (a pollution tolerant species). Analysis of the sediment quality triad suggests that containments are stressing the benthic community.

Surface water samples exhibit elevated HQs for some metals and it is stated that there is a potential risk in Level 3 fish species from directly toxic effects (Page 10-1-56).

The recommendation on page 10-1-57 is to transfer the site to the petroleum program; however, elsewhere in the report there is a recommendation to transfer the site to the base stormwater program. The source of contamination to this wetland is apparently from some of the sites associated with Operable Unit (OU) 2 and also from storm water runoff. An evaluation of the Conceptual Surface Water Migration Pathways presented in Figure 8-1 suggests that this wetland is closely associated with Wetlands 5A, 5B, and 6.

Transfer of this wetland to the Base Stormwater Program will be considered; however, the source of water into these wetlands needs to be identified and pretreatment will be required since the wetland cannot serve as the final remedy for treatment of stormwater. The source of petroleum contamination has not been established therefore it is unclear if transfer of any portion of this site to the petroleum program is appropriate at this time.

Response:
Agreed, the sediment chemistry and toxicity test results indicate some stress to the benthic community. The Navy is recommending a feasibility study for Wetland 64.

Section 10.2, Wetland 5A/5B
FDEP Comment:
Wetland 5A and potentially 5B are impacted by Site 30 due to the presence of several volatile organic compounds (1,1-Dichloroethane, cis-1,2-dichloroethene, and vinyl chloride) detected in surface water samples. These compounds potentially represent degradation products of chlorinated solvents located in the Site 30 area.

Other volatile compounds (bromodichloromethane, chloroform, and dibromochloromethane) are potentially an artifact from the potable water supply release into Wetland 5A.

Transfer of this wetland to the Base Stormwater Program will be considered; however, the source of water into these wetlands needs to be identified.

Response:
The groundwater to wetland sediment/surface water pathway is evaluated in the RI report. The Navy agrees that the trihalomethanes may be related to the potable water supply release into Wetland 5A. The Navy is recommending a feasibility study for Wetland 5A. However, toxicity testing performed in 2004 at Wetland 5B do not indicate that constituents present are causing adverse acute or chronic effects on benthic macroinvertebrates. The food-chain model indicates HQs less than one for PCBs, dieldrin, and BHC. Therefore, the Navy is recommending NFA for Wetland 5B.

Section 10.3 Wetland 3
FDEP Comment:
HQs were high at sample location 0303 for DDT (184), DDE (57), and DDD (327). Results of the benthic toxicity study indicate that sediment contaminants are not bioavailable; however, toxicity samples were not collected at location 0303. Four VOCs (benzene, chlorobenzene, methylene chloride, and cis-1, 2-dichloroethene) were also detected in surface water samples and are potentially leaching from Site 1. Wetland 3 is directly impacted by discharge of groundwater from Site 1 (OU 1) and should continue to be monitored in conjunction with remedial activities at Site 1.

Response:
A feasibility study is recommended for this site to address sublethal effects to the benthic community.

Section 10.4, Wetland 4D
FDEP Comment:
Table 10-4-12 indicates a slight human health risk for the trespasser and maintenance worker from arsenic in the sediments. Carcinogenic risk for the trespasser and maintenance worker from arsenic is 1.67E-06 and 2.71E-06, respectively. Arsenic is most likely attributed to normal herbicide application on the golf course where Wetland 4B is located. Since there is no apparent ecological risk at this wetland a no further action (NFA) decision is appropriate.

Response:
Agreed. The arsenic is likely related to herbicide application on the golf course, and Wetland 4D is appropriate for NFA.

Section 10.5, Wetland 16
FDEP Comment:
The two VOCs (1, 1-dichloroethane and chlorobenzene) detected in surface water at Wetland 16 may be associated with leachate from Site 1 (OU1). The recommendation for NFA may be appropriate for Wetland 16; however, some monitoring of the wetland may be required in conjunction with monitoring of Site 1.

Response:
The Navy has added some additional monitoring wells at Site 1 to assess groundwater contamination.

Section 10.6, Wetland 18
FDEP Comment:
Wetland 18A is fed by a groundwater seep originating from Site 1 (page 10-6-1).

Elevated HQs for chemicals in sediments include DDT (1512), DDD (762), DDE (130), arsenic (11.5), and naphthalene (8.6).

DDT and PCBs were detected in level 3 fish tissue. HQs estimated for heron exposure to total DDT in fish tissue exceeded 1 (3.67) based on feeding territory during the fall season.

Further delineation of DDT is recommended for this wetland. In addition, monitoring of surface water may be required in conjunction with remedial activities at Site 1.

Response:
Detected pesticides are assessed in an OU 1 wide food chain model. Napthalene is not retained as a COPC in sediment after refinement. When normalized to TOC, PAHs are not identified as risk drivers. Arsenic does not exceed its RV. Parameters retained after refinement are evaluated in the fate and transport analysis to determine if groundwater and/or storm water transport are valid pathways to the wetland surface water/sediment.

Since the passage of the Homeland Security Act and the publishing of NAS Pensacola Instruction 5500.1F, which contains the *Pensacola Complex Physical Security Plan* (NAS Pensacola, October 22, 2003), Wetland 18 is now in an area of the base that is restricted to general access by the public.

Section 10.7, Wetland 10
FDEP Comment:
Silver was detected at one surface water sample location at a concentration of 24,500 µg/L. This is potentially a data entry error (a duplicate of the value reported for sodium) that should be corrected if necessary. The HQ for silver is not reported on Table 10-7-4. The freshwater surface water criteria of silver is 0.07 µg/L (Chapter 62-302, FAC).

A review of the surface flow conceptual model indicates that this wetland is potentially affected by Wetlands 12 and 13. Wetland 11 (East of Building 3644) may also potentially impact Wetland 10 if an overflow culvert from Wetland 11 extends east under a road into Wetland 10. It is likely that Wetland 10 is impacted by Sites 32, 33, and 35.

Transfer of this wetland to the Base Stormwater Program will be considered; however, the source of water into these wetlands needs to be identified.

Response:
The silver concentration was in error and has been corrected. Storm water and groundwater discharge to the wetland sediment and surface water are evaluated in the fate and transport analysis to determine if the pathways are valid. The Navy recommends a feasibility study contingent upon a confirmatory sampling of metals at that location.

Wetland 10.8, Wetland 12
FDEP Comment:
The Pensacola Partnering Team referred Wetland 12 to the State of Florida Petroleum Program (documented in the September 19 and 20, 1006 Partnering Meeting Minutes). I agree with this decision.

Response:
Agreed. The bilge water spill is being investigated under the state's petroleum program. Therefore, CERCLA has no authority to proceed.

Section 10.9, Wetland 1
FDEP Comment:
A potential source to Wetland 1 is Site 1 (OU1) Sanitary Landfill. Based on the discussion conducted during the March 28, 20001 Partnering Meeting, activities associated with Forrest Sherman Field may also have been a source for PAHs.

The source of PAHs should be confirmed. This wetland will potentially require monitoring as part of the remedy at Site 1.

Response:
Wetland 1 has been subdivided into 1A and 1B. Wetland 1A is the wetland, while 1B is a storm water drainage ditch. PAHs were not detected in Wetland 1A and were below the Swartz MEC in Wetland 1B.

Fate and transport analysis based on two associated Site 1 monitoring wells indicated that the storm water to wetlands media and groundwater to wetlands media pathways are not valid for Wetland 1A.

Wetland 1B is an open storm water ditch. This drainage ditch begins at an outfall formed by twin 54-inch concrete pipes and merges downstream with Wetland W2. Sample locations 041M010301 and 041M010401 were collected just downstream from this outfall. A review of the NAS Pensacola SWPPP shows a system of underground concrete pipes leading to this outfall. Wetland 1B is currently being monitored under the Storm Water Pollution Prevention Program in accordance with the Florida Generic Permit.

Section 10.10, Wetland 15
FDEP Comment:
Metals (aluminum, arsenic, beryllium, chromium, cooper, iron, lead, mercury, nickel and zinc) exceed marine surface water criteria at sample location 1501. Sample turbidity exceeded 1,000 nephelometric turbidity units (NTUs) as reported in Table 4-1.

The source of mercury in the surface water should be identified. I recommend that a confirmation surface water sample be collected to determine if NFA is appropriate for this wetland.

Response:
The Navy agreed to resample at location 1501 for surface water. However, the location did not contain surface water. The previous sample had been collected from a depression dug at that location and the sample was highly turbid and not representative of the surface water media.

The Navy continues to recommend no further action for this wetland based on the data evaluation presented in the Site 41 RI report.

Section 10.11, Wetland 6
FDEP Comment:
A review of the surface flow conceptual model indicates that this wetland is affected by Wetland 5. Groundwater discharge into Wetland 6 from sites associated with OU2 and Site 23 (Chevalier Field Pipe Leak Area) is also likely to occur.

The conclusions state that Wetland 6 is a channelized ditch without a viable aquatic community; however, it is stated on page 10-11-1 that small fish and crayfish have been observed in this wetland. In addition, the blue heron has been observed in this wetland on occasion.

Transfer of this wetland to the Base Stormwater Program will be considered; however, the source of water into this wetland needs to be identified.

Response:
This wetland functions primarily as a drainage ditch. The food chain models indicate acceptable risk levels to predators. The fate and transport analysis evaluates the groundwater and storm water pathways from OU 2 to the wetland media as well as transport within the wetland. No further action is recommended for Wetland 6.

Section 10.12, Wetland 63A
FDEP Comment:
Metals (aluminum, cooper, iron, and lead) exceed surface water criteria at sample location 63A2. Lead was identified as surface water COPC. Probable source include Site 14 (Dredge Spoils Disposal Area) and UST Site G (Building 2662).

I recommend that a confirmation surface water sample be collected and that groundwater data from sites adjacent to this wetland be reviewed to determine if an NFA decision is appropriate for this wetland.

Response:
Location 63A2 was resampled for metals in 2004. Only manganese and barium were retained as COPCs after refinement. Lead was not retained as a COPC after refinement for surface water based on the 2004 sampling event. The fate and transport analysis evaluates storm water and groundwater pathways to wetland media. The weight of evidence continues to support NFA.

Section 10.13, Wetland 48
FDEP Comment:
DDD (2,600 µg/kg), DDE (620 µg/kg), and DDT (240 µg/kg) were detected at concentrations that exceed sediment benchmark levels in sample 4801. Sediment HQs were elevated for DDD (2131), DDE (299), and DDT (201). No COPCs were identified for sediments and surface water; however, no formal ecological or human health risk assessment was conducted. High DDT and metabolite concentrations should be further evaluated in order to determine nature and extent of the exceedance.

Response:
Pesticides/PCB concentrations have been evaluated in the Remaining Wetlands food chain model. Formal ecological and human health risk assessments have been conducted on Wetland 48. However, no connection to an IR site can be established. The most likely source of the pesticides is road side application.

Section 10.14, Wetland 49
FDEP Comment:
This wetland is apparently self-contained with Wetland 51 and surface water enters the wetlands only during rainy periods. A fuel release (Site 19, Fuel Farm Pipeline Leak) occurred near the Wetland 49 area in 1958. No sediment or surface water COPCs were identified. Public access is restricted to Wetland 49 due to the proximity of Forrest Sherman Field and the base pistol range. I agree with a no further action decision for this wetland.

Response:
The Navy has evaluated Wetland 49 using food chain models, mean ERM quotients, and TOC normalization of VOCs and PAHs. The multiple lines of evidence continue to support NFA.

Section 10.15, Wetland 13
FDEP Comment:
Twenty-one metals were detected in one surface water sample. The sample is reported to have a high turbidity (greater that 1,000 NTUs). Since there is no permanent standing water in this wetland and sample turbidity probably contributed to the detection of metals, I agree with an NFA decision.

Response:
A re-sampling event in 2004 was attempted, but the wetland contained no surface water. Therefore, the original sample is not representative of the surface water media. The Navy recommends NFA.

Section 10.16, Wetland 17
FDEP Comment:
Site 1 (OU) is the only site that may potentially impact Wetland 17. A no further action decision will be considered for Wetland 17; however, surface water monitoring may be required in conjunction with monitoring at Site 1.

Response:
The surface water location was resampled in 2004 for metals, and thallium remained above its criteria. The fate and transport analysis evaluated the groundwater to wetland surface water pathway. The pathway was not validated for thallium. No COPCs were retained after refinement for sediment. Therefore, the contaminant levels do not warrant further action at Wetland 17.

Section 10.17, Wetland 19
FDEP Comment:
The location and conceptual surface water flow indicated that this wetland is probably accepting storm water runoff from Sherman Field during heavy rain events and directing the runoff toward Redoubt Bayou. Access to this area would be restricted due to the airfield.

The Partnering Team decided that an NFA decision for Wetland 19 was appropriate (September 18, 1996 Eco Meeting Minutes and September 19 and 20, 1006 Partnering Team Minutes). Since the wetland is receiving storm water runoff, it should be transferred to the base storm water program. As shown on Figure 15-1, the Redoubt Bayou area is monitored at Outfall 30 near the end of Wetland W2.

Response:
Location, 041W19A1, was resampled in 2004 for metals to verify the exceedances. The results are presented in Section 15.1. Only barium and manganese were retained after refinement. The Navy continues to support an NFA decision for Wetland 19.

Section 10.18, Wetland 52
FDEP Comment:
Based on the surface flow conceptual model, this wetland is receiving storm water overflow from Wetland W1 and is possibly impacted from NAS Fuel Farm, Sherman Field, and UST Site 18 (Crash Crew Training Area). The source of petroleum contamination has not been established therefore it is unclear if transfer of any portion of this wetland to the petroleum program is appropriate.

Response:
The fate and transport analysis evaluates storm water and groundwater discharge to wetlands media pathways. TOC normalized PAH concentrations are less than the TEC. In addition, the food chain models indicate an HQ of less than 1 for dieldrin. The multiple lines of evidence indicate that the contaminants do not warrant further evaluation.

Section 10.19, Wetland 56
FDEP Comment:
The wetland receives stormwater runoff from Sherman Field and has an active NPDES permit for a stormwater outlet. This wetland should be transferred to the Base Storm Water Compliance Program.

Response:
As presented in Section 15.2, no parameters were retained after refinement for sediment. The food-chain model for the remaining wetlands do not indicate an adverse risk to predators. In addition, TOC normalized PAHs did not exceed the TEC. Therefore, contaminants do not warrant further investigation.

Section 10.20, Wetland 57
FDEP Comment:
The wetland receives stormwater runoff from Radford Blvd. This wetland should possibly be transferred to the Base Storm Water Compliance Program. The Navy should consider collecting a confirmation surface water sample in order to determine if NFA is appropriate for this wetland.

Response:
As presented in Section 15.3, no parameters were retained after refinement for sediment. The food-chain model for the remaining wetlands do not indicate an adverse risk to predators. In addition, TOC normalized PAHs did not exceed the TEC. Therefore, contaminants do not warrant further investigation.

Section 10.21, Wetland 58
FDEP Comment:
The wetland apparently receives stormwater runoff from roads in the area, possibly Site 39 (Oak Grove Campground), and the area adjacent to Sherman Field. This wetland should possibly be transferred to the Base Storm Water Compliance Program. The Navy should consider collecting a confirmation surface water sample in order to determine if NFA is appropriate for this wetland.

Response:
As presented in Section 15.4, only two SVOCs were retained after refinement for sediment. The food-chain model for the remaining wetlands do not indicate an adverse

risk to predators. In addition, TOC normalized PAHs did not exceed the TEC. Therefore, contaminants do not warrant further investigation.

Section 10.22, Wetland 63B
FDEP Comment:
Since this wetland is only receiving storm water runoff, an NFA is appropriate for this wetland.

Response:
The Navy agrees that NFA is appropriate.

Section 10.23, Wetland 72
FDEP Comment:
Aluminum, silver, and thallium exceeded their respective surface water criteria. HQs were slightly elevated or cooper (2.08) and fluoranthene (1.06) in sediments. HQs were elevated for aluminum (10), silver (62.8), and thallium (1.3) in surface water.

Wetland 72 receives discharge by stormwater piping from Wetland W1 in the Sherman Field Area. The report states that no sediment nor surface water COPCs were identified. It is not clear where the source of silver originates from and how it was not considered a COPC.

Since this wetland is receiving stormwater runoff from Sherman Field, the wetland should possibly be transferred to the Base Storm Water Compliance Program. The navy should consider collecting a confirmation surface water sample in order to determine if NFA is appropriate for this wetland.

Response:
A confirmation surface water sample was collected from Wetland 72 in April of 2004. The only surface water parameter retained after refinement is barium. The TOC normalized PAHs are less than the TEC and the food-chain models do not indicate an adverse risk to predators. The Navy recommends NFA for this wetland.

Section 10.24, Wetland 79
FDEP Comment:
Wetland 79 no longer exists since being filled in with concrete debris around 1995 (approved by Corps of Engineers). No surface water samples could be taken. No sediment COPCs were identified in the assessment.

This area received storm water runoff at one time from parking areas near Sherman Field. There are no apparent risks at the site and since no suitable wetland habitat remains, I agree with a NFA decision for Wetland 79.

Response:
Because the wetland has been filled, it is not presented in the 2005 version of the RI report.

Section 10.25, Wetland W2
FDEP Comment:
Wetland W2 is also known as the Southeast Drainage Ditch. Since this wetland is receiving stormwater runoff from Sherman Field, the wetland should be transferred to the Base Storm Water Compliance Program.

Response:
Outfall 030 at the northern extent of Wetland W2 is monitored under the Storm Water Monitoring Program.

Section 10.26, Wetland 25
FDEP Comment:
Wetland 25 was identified as a reference wetland since there is no apparent connection to any CERCLA site and is located in an undeveloped area of the Base.

Response:
Agreed. Wetland 25 is a reference wetland and is not presented in the Final RI Report.

Section 10.27, Wetland 27
FDEP Comment:
Wetland 27 was identified as a reference wetland since there is no apparent connection to any CERCLA site and is located in an undeveloped area of the Base.

Response:
Agreed. Wetland 27 is a reference wetland and is not presented in the Final RI Report.

Section 10.27, Wetland 32
FDEP Comment:
Wetland 32 was identified as a reference wetland since there is no apparent connection to any CERCLA site and is located in an undeveloped area of the Base.

Response:
Agreed. Wetland 32 is a reference wetland and is not presented in the Final RI Report.

Section 10.29, Wetland 33
FDEP Comment:
Wetland 33 was identified as a reference wetland since there is no apparent connection to any CERCLA site and is located in an undeveloped area of the Base.

Response:
Agreed. Wetland 33 is a reference wetland and is not presented in the Final RI Report.

Section 10.30, Wetland W1
FDEP Comment:
Wetland W1 is a mowed swale that collects surface water runoff from the Sherman Field airfield and directs it off site and drain pipes to Wetland 52. Since this wetland is receiving storm water runoff from Sherman Field, the wetland should be transferred to the base storm water compliance program.

Response:
Wetland W1 is being investigated under FDEP's petroleum program.

Section 10.31, Wetland 75
FDEP Comment:
Wetland 75 was originally evaluated as a reference wetland; however, this status was later dropped. Since this wetland is receiving storm water runoff from a highway, the wetland should be transferred to the base storm water compliance program.

Response:
Wetland 75 is not related to an IR site and was sampled only as a possible reference wetland. The wetland is not assessed in this report.