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LETTER SUBMITTING THE FINAL REMEDIAL INVESTIGATION REPORT ADDENDUM FOR
SITE 2 WITH NAVY RESPONSES TO REGULATORY COMMENTS NAS PENSACOLA FL

2/28/2003

ENSAFE



ENSAFE INC.

ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

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February 28, 2003

Florida Department of Environmental Protection
Attn: Tracie Vaught
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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

Dear Ms. Vaught:

On behalf of the Navy, EnSafe Inc. is pleased to submit two copies of the Final Remedial Investigation Report Addendum, Site 2 Waterfront Sediments for the Naval Air Station Pensacola. Responses to EPA, FDEP and NOAA comments are also provided.

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

Sincerely,

EnSafe Inc.

A handwritten signature in cursive script that reads "Allison L. Harris".

Allison L. Harris
Task Order Manager

Enclosure

cc: Charlie Goddard, FDEP – NW District without enclosure
Bill Hill, Code 1851 SOUTHNAVFACENGCOM without enclosure
EnSafe Inc. file without enclosure
EnSafe Inc. Pensacola file without enclosure
EnSafe Inc. Knoxville file without enclosure
EnSafe Inc. library without enclosure
Administrative Record

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

Comments received 22 February 20 02

Comment 1:

Page 2-3: A sample location map should be added to the document.

Response 1:

An orientation map is provided in Figure 1-1, which identifies the study area and the two reference locations. Figure 2-1 identifies the decision units at Site 2.

Comment 2:

Page 3-11, 1st paragraph: Define or explain the Hazard Quotient for this table.

Response 2:

Agreed. The definition for Hazard Quotient will be included as a footnote to Table 3-1 and will also be explained in the text.

Comment 3:

Page 3-11, Table 3-1: Define "Sediment Benchmark" in the footnotes.

Response 3:

Agreed. The definition for Sediment Benchmark will be included as a footnote to Table 3-1.

Comment 4:

Page 3-14, Section 3.1.2 Sediment Subsurface: The subsurface findings explained in Appendix B need to be discussed further. Appendix B discusses subsurface contamination for metals, Polynuclear Aromatic Hydrocarbons (PAHs) and Semi Volatiles. Figures showing subsurface contamination with a top view and a vertical cross section should be included in this section.

Response 4:

Agreed. Subsurface findings will be addressed in the body of the report.

Comment 5:

Page 3-15, 1st paragraph: What is this sentence trying to say?

Response 5:

Section 2.1.3 explains acid volatile sulfides and simultaneously extracted metals (AVS/SEM) and the role they play in the equilibrium partitioning approach. AVS/SEM provides general information on the possible bioavailability of five (Cd, Cu, Ni, Pb, and Zn) distinct metals. Section 3.1.3 provides the results from the AVS/SEM analyses. The last sentence in that section states: "For Site 2 the AVS/SEM results revealed that metal constituents are generally not bioavailable, though they may be at Stations GH-12, CD-23, and GH-67." We will insert the word 'present' into the statement so

it reads, "...though they may be present at Stations GH-12, CD-23, and GH-67". Table 4-3 shows no impact on biota at Stations GH-12, CD-23, and GH-67.

Comment 6:

Page 4-15, 1st paragraph: Are we ignoring evidence and data that would lead to a Feasibility Study?

Response 6:

The Navy assumes this comment refers to paragraph 4.4.10; Station CD-23. This station was one of the furthest sampling stations from Site 2, and was the closest station to the wet slip on the west side of the Allegheny Pier. Boat traffic in and out of the wet slip may have contributed or might be the source of the contamination at Station CD-23. Table 3-1 shows that 14 constituents with HQs above 1 were detected at Station CD-23. However, 11 of these exceedances were for PAHs and metals, indicating the contamination is likely related to vessel traffic in the Site 2 area.

Comment 7:

Page 5-1: Does the decision tree really take us in the direction of NFA?

Response 7:

Table 4-6, Page 4-10, shows that 9 of the 11 decision units within Site 2 follow the steps to NFA when applied to Flow Chart 2, the Simplified Decision Flow for Each Decision Unit. Decision Units CD-23 and EF-45 are the exceptions. The multiple lines of evidence gathered during the investigation of Site 2 indicate that the area is recovering from past Naval Base activities.

Comment 8:

Appendix B, Page 2: A sample location map for the sediment and subsurface samples is required for a complete review of this material.

Response 8:

Appendix B was compiled by USEPA Region IV and cannot be revised. An orientation map is provided in Section 1, and Figure 2-1 includes station decision unit identifications. In addition, Appendix A Figure 1 shows the sampling grid and sediment sampling plan. For further clarification, Step 7 of the DQO process (Page 21) provides a verbal explanation of the sampling plan, procedures, and rationale.

Comment 9:

Appendix B, Page 7: Metals contamination found in the subsurface for DUs 3 and 4 should be discussed in Chapter 3 of the RI Addendum.

Response 9:

Agreed. Subsurface sediment will be discussed in the RI Addendum.

Comment 10:

Appendix B, Page 9, paragraph 2: This paragraph should be discussed in chapter 3 of the RI Addendum.

Response 10:

Agreed. Subsurface sediment will be discussed in the RI Addendum.

Comment 11:

Appendix B, Page 12: PAHs contamination found in the subsurface for DUs 3 and 11, should be discussed in Chapter 3 of the RI Addendum.

Response 11:

Agreed. Subsurface sediment will be discussed in the RI Addendum.

Comment 12:

Appendix B, 3.1.4 Pesticides/PCB Analysis: Why is there no discussion of the subsurface findings in this section?

Response 12:

The Draft RI Addendum focused on the upper 6 inches of sediment. Subsurface sediment will be discussed in the RI Addendum. Appendix B was compiled by USEPA Region IV under contract to the Navy and cannot be revised.