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NAS PENSACOLA
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FINAL REMEDIAL
INVESTIGATION ADDENDUM FOR SITE 2 NAS PENSACOLA FL
5/9/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

32501-002
09.01.02.0044

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

May 9, 2003

Mr. Bill Hill
Code ES311
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Final Remedial Investigation Report Addendum
Site 2 Waterfront Sediments, NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated February 28, 2003 (received March 3, 2003). This document addresses previous comments from the Department dated February 21, 2002 and comments from Hugo Ochoa with the University of Florida dated February 4, 2002, see attached letter for details. Due to changes made in the subject document further review was necessary, the Department has some additional comments:

1. **Tables 3-1 and 3-2:** These tables have incorrectly reported reference concentrations by adding the two reference concentrations together. Reference concentrations for sediments should either be the average of the concentrations found in the reference samples or the range of sample concentrations detected.
2. **Section 3:** Changing the reference concentrations will affect all discussions, tables and figures in Section 3.
3. **Conclusions:** A Feasibility Study needs to be discussed in this section.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Mr. Bill Hill
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If I can be of any further assistance with this matter,
please contact me at (850) 245-8998.

Sincerely,

Tracie L. Vaught

Tracie L. Vaught
Remedial Project Manager

enclosures

cc: Ron Joyner, NAS Pensacola
Gena Townsend, USEPA Region 4
Brian Caldwell, EnSafe, Knoxville
Allison Harris, EnSafe, Memphis
Gerry Walker, Tetra Tech NUS, Inc., Tallahassee
Charlie Goddard, FDEP Northwest District

TJB

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May 6, 2003

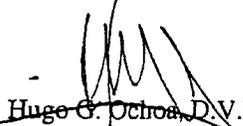
Ligia Mora-Applegate
Bureau of Waste Cleanup
Florida Department of Environmental Protection
Room 471A, Twin Towers Office Building
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Tallahassee, FL 32399
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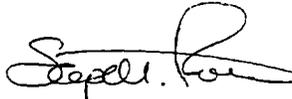
Dear Ms. Mora-Applegate,

At your request, we have reviewed the February 2003 *Final Remedial Investigation Report Addendum, Site 2 Waterfront Sediments, Naval Air Station Pensacola, Florida*. We reviewed a previous version of this document in a letter sent to you on February 4, 2002. Most of our comments were addressed in the present version, and we believe this revised document provides useful information for the evaluation of this site. Our previous comments objected to the comparison of 1996 and 2000 sediment concentration data used to assert that concentrations are decreasing over time. We thought this was inappropriate because 1996 data were obtained from discrete samples, whereas information from 2000 was based on composite samples. We also warned against relying on available sulfide information to predict future availability of metals. The current document does not include the concentration comparison and includes sulfides data only as ancillary information. As before, we think that the lack of overt toxicity observed on the bioassays coupled with the absence of significant effects on species diversity and abundance observed in community surveys demonstrate that contaminants present at the site are not having a significant adverse effect on benthic organisms, even though some Effect Range Medium (ERM) and Probable Effect Levels (PELs) are exceeded in some of the quadrants studied. Given that none of the contaminants present at the site are expected to bioaccumulate significantly, the lack of direct effects suggests there are no significant adverse environmental effects due to Site 2 contaminants.

We hope these comments are helpful. Please do not hesitate to contact us if you need further assistance regarding this site.

Sincerely,


Hugo G. Ochoa, D.V.M., Ph.D.


Stephen M. Roberts, Ph.D.