N00204.AR.004488
NAS PENSACOLA
5090.3a

LETTER SUBMITTING NAVY RESPONSES TO REGULATOR COMMENTS ON FINAL REMEDIAL INVESTIGATION ADDENDUM FOR SITE 2 NAS PENSACOLA FL
3/29/2004
ENSAFE

ENSAFE

ENSAFE INC. ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

5724 Summer Trees Drive • Memphis, Tennessee 38134 • Telephone 901-372-7962 • Facsimile 901-372-2454 • www.ensafe.com

March 29, 2004

Commander
Attn: ES31 Mr. Bill Hill
SOUTHNAVFACENGCOM
2155 Eagle Drive
North Charleston, South Carolina 29406

Subject: Delivery of Report, Final Remedial Investigation Report Addendum Errata Pages
CTO-059, Categories 2 and 3, Naval Air Station Pensacola, Florida
Contract # N62467-89-D-0318, CLEAN II

Dear Mr. Hill:

EnSafe Inc. is pleased to submit one printed copy of the Final Site 2 (Operable Unit 3) Remedial Investigation Report Addendum Errata Pages for the Naval Air Station Pensacola. Also enclosed are two "Living CDs" containing supporting documents for the Site 2 decision process and an electronic copy of the RI Addendum with incorporated errata pages. Responses to EPA, FDEP and NOAA comments are also enclosed.

If you should have any questions or need any additional information, please let me know.

Sincerely,
EnSafe Inc.

Allison L. Harris
Task Order Manager

Enclosures: Site 2 (Operable Unit 3) Final RI Report Addendum Errata Pages, NAS Pensacola

cc: Ms. Katie Stohs, Code ACQ22 SOUTHNAVFACENGCOM without enclosure
Mr. Greg Campbell, NAS Pensacola – 2 printed and 2 CDs
Mr. Greg Fraley, USEPA Region IV – 1 printed and 1 CD
Ms. Tracie Vaught, FDEP - 1 printed and 2 CDs
Mr. Tom Dillon, NOAA - 1 printed and 1 CD
Mr. Greg Wilfley CCI -1 CD
Mr. Gerry Walker, TetraTech NUS – 1 CD
EnSafe Inc. CTO-059 without enclosure
EnSafe Inc. Knoxville file – 1 CD
EnSafe Inc. Pensacola – 1 CD
EnSafe Inc. Charleston – 1 CD
EnSafe Inc. Library – 1 printed
Administrative Record - 1 printed

Navy Response to Florida DEP Comments on the Final Remedial Investigation Report Addendum Site 2 Waterfront Sediments, NASPensacola
May 9, 2003

Comments received 15 May 03

Comment 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 the sample concentrations detected.

Response:
Section 3.1.1 of the text details how the data collected at the reference stations were used to develop site specific reference concentrations for individual constituents for comparison to Site 2 detections. Two times the mean concentration for each detection at Stations 18 and 22 was used as the reference concentration for each given constituent. This method and approach was agreed upon by the partnering team during the early stages of the DQO process.

Comment 2:
Section 3: Changing the reference concentrations will affect all discussions, tables and figures in Section 3.

Response:
The reference concentrations were calculated correctly, therefore no tables or figures need to be amended.

Comment 3:
Conclusions: A Feasibility Study needs to be discussed in this section.

Response:
A Feasibility Study will be developed for Site 2, as explained in Section 5.

Navy Response to University of Florida/Florida DEP Comments on the Final Remedial Investigation Report Addendum Site 2 Waterfront Sediments, NAS Pensacola
May 6, 2003

Comment 1:
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 4 February 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.

Response:
The Navy agrees with this statement.

Comment 2:
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.

Response:
The Navy removed all 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 3:
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.

Response:
The Navy recognizes the AVS/SEM Model as a tool which can be used to enhance a data set and provide a theoretical measure of potential bioavailability for five divalent metals. When used in concert with other theoretical tools the AVS/SEM Model can be utilized in the weight of evidence approach.

Section 3.1.5 provides the AVS/SEM results in surface sediments. The data was calculated using two USEPA approaches. The Navy showed both outcomes in Table 3-4, and placed more emphasis in the USEPA 2001 method (versus the USEPA 1991 method) which correlated more with the other technical findings.

Comment 4:
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 the benthic community surveys demonstrate that contaminants present at the site are not having a significant adverse effect on benthic organisms, even though some Effects Range Medium (ERM) and Probable Effect Levels (PELs) are exceeded in some of the quadrantsstudied.

Response:
The Navy agrees.

Comment 5:
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.

Response:
The Navy agrees.