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NAS PENSACOLA  
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LETTER REGARDING NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION  
COMMENTS ON DRAFT FOCUSED FEASIBILITY STUDY ADDENDUM FOR SITE 2 NAS  
PENSACOLA FL  
4/29/2004  
NOAA



## MEMORANDUM

**TO:** NAS Pensacola Team

**FROM:** Tom Dillon, Ph.D.

**SUBJECT:** NOAA Comments on Site 2 Feasibility Study

**DATE:** April 29, 2004

The U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to comment on Draft Focused Feasibility Study Report Addendum Site 2 - Waterfront Sediments NAS Pensacola, Pensacola, Florida, prepared by EnSafe Inc., Memphis, TN for NAVFAC Southern Division, January 29, 2004. If you have any questions, please contact me at 404-562-8639; FAX 404-562-8662 or tom.dillon@noaa.gov.

- 1. Sediment bioassays should be added to Alternative 4: Long Term Monitoring.** In assessing the Long-Term Effectiveness and Permanence of Alternative 4 (§3.2.4), the report states that "toxicity could decrease with time". To assess this directly, add toxicity tests to the Long Term Monitoring Alternative. Assessing toxicity directly and not relying solely on sediment chemistry is especially important because, as the RI Addendum notes, often there is poor correlation between sediment chemistry and sediment toxicity. This is most likely due to differences in contaminant bioavailability in Site 2 sediments (e.g., presence of paint chips, varying levels of organic carbon and acid-volatile sulfides).
- 2. Unless there is a compelling reason to do so, backfilling should be eliminated from Alternative 3: Dredging.** Cost breakouts in Table B-3 indicate considerable resources are proposed for backfilling (≈\$316,000) after dredging 2 Decision Units. Eliminating the backfilling step would save the U.S. Government a considerable sum of money and lower the Total Net Present Worth of Alternative 3 from \$1,283,000 to approximately \$761,000 (Table 4-1).

### **3. Other Comments**

§1.2.1 Text suggests Site 2 is "recovering". Rather than "recovering", multiple lines of evidence suggest the sediments at Site 2 have probably reached an equilibrium (see detailed explanation in NOAA's April 7, 2003 comments on RI Addendum).

§2.1 The text does not explain why the No Action Alternative will cost \$45,000.

§2.3 For Alternative 3, it was assumed that all excavated material will be transported to a Subtitle D Landfill rather than be used as fill material on base. Is this a reasonable assumption given what we know about the expected level of contamination?

§3.1 The 9 criteria for evaluating remedial alternatives should be presented in the same order as they appear in the NCP and in §4.0; i.e., Threshold Criteria, then Balancing Criteria, then Modifying Criteria.