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RESPONSES TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 4
TECHNICAL REVIEW OF THE DRAFT FINAL SAMPLING AND ANALYSIS PLAN WETLAND
SEDIMENT AND SURFACE WATER SAMPLING OPERABLE UNITS 1,2, AND 16 SITE 41
DATED SEPTEMBER 2014 ECOLOGICAL RISK REVIEW NAS PENSACOLA FL
10/08/2014
NAS PENSACOLA

**RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 4
TECHNICAL REVIEW OF THE
DRAFT FINAL SAMPLING AND ANALYSIS PLAN
WETLAND SEDIMENT AND SURFACE WATER SAMPLING
OPERABLE UNITS 1, 2, AND 16 — SITE 41
DATED SEPTEMBER 2014**

ECOLOGICAL RISK REVIEW

**NAVAL AIR STATION PENSACOLA
ESCAMBIA COUNTY, PENSACOLA, FLORIDA
EPA ID NO. FL9170024567
Dated 24 September 2014**

General Comment 4:

The response to General Comment 4 is partially adequate. The response indicates that wetland-specific food web risk evaluation will be based on the upper confidence level of the mean concentration of the contaminant in the wetland (estimated with ProUCL software). However, this is not consistent with the recommendation provided by EPA to the Navy via email correspondence on Friday, April 25, 2014 11:50 AM where EPA stated that EPA does not object to use of ProUCL; however, the maximum and average calculations will be required. Please revise the SAP Appendix B to also include the maximum and average calculations.

Response:

The Navy agrees to use the maximum and average calculations for the wetland-specific food web risk evaluations. Appendix B has been updated to include the maximum and average concentrations.

Minor Comments

Comment 1:

Worksheet #9, project scoping on June 7, 2013, C. Marcussen was no longer with TechLaw. As of 8/1/12, C. Marcussen is with Skeo Solutions. Please change the affiliation to Skeo Solutions and the email address to cmarcussen@skeo.com.

Response:

Claire Marcussen's affiliation and email address have been updated on Worksheet #9.

Comment 2:

Throughout worksheet #10 the statement is made that the evaluation of upper trophic level receptors will be contingent on the following: 1) identification of sediment concentrations that are greater than historical concentrations and 2) determination that extent of contamination is not an isolated area. According to Appendix B and consistent with past EPA comments on food web models, surface water should also be included in the food web models. Please clarify that surface water will also be addressed in the food web model if bioaccumulative compounds are detected. In addition, Box 10-4 indicates that food web model will be conducted on the surface water data while Boxes 10-3 and 10-5 through 10-15 indicated food web model will be conducted using sediment data. Please revise the SAP to be consistent with Appendix B that surface water and sediment will be addressed in the food web model.

Response:

The boxes in Worksheet #10 have been updated to clarify that surface water will also be addressed in the food web model if bioaccumulative compounds are detected.