

RESPONSE TO COMMENTS

ON THE

PRELIMINARY DRAFT HSWA PERMIT

FOR

**U. S. N. COASTAL SYSTEMS CENTER , DEPARTMENT OF THE NAVY
(A.K.A. COASTAL SYSTEMS, STATION PANAMA CITY)
PANAMA CITY, FLORIDA
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SEPTEMBER 2000

The following is EPA's response to the Navy's August 29, 2000, comments on the preliminary draft permit and fact sheet for the above facility. Note: EPA's responses are in bold print.

1. On page 1 of the Fact Sheet, remove the reference to FDEP Permit #HF03-271924. That permit is obsolete since CSS is now considered a Small Quantity Generator.

Revised as requested.

2. In the last paragraph on page 7 of the Fact Sheet, change Arturo McDonald's phone number to (850) 234-4743 and FDEP's area code to 850.

Revised as requested.

3. The Navy appreciates the EPA's concurrence in Appendix A.2, of those sites requiring no further action. However, we take exception to Appendix A.3. which would require that an RFI be performed on three SWMUs and one AOC. The Navy has proceeded with its' investigation of the environmental concerns at the facility in accordance with the RCRA Corrective Action Plan issued by your agency. The Navy received written approval from the EPA and FDEP for each step of the prescribed process. A brief synopsis is given below:

At a meeting on April 5, 2000, Navy staff informed EPA that no groundwater monitoring had occurred for at least eighteen months, and that the product plume from SWMU 10, may have migrated off base. There was no information on the contaminated groundwater plume. It was also stated that contamination was showing up in an area that had been previously NFA'd. Therefore, the extent of groundwater contamination and the nature and extent of contamination is not known. An addendum to the RFI is required to delineate the nature and extent of contamination. On April 5, 2000, April 26, 2000, and June 3, and June 20, 2000, the Navy was informed that the Statement of Basis was not approvable, and that natural attenuation was not an appropriate remedy for contaminated groundwater that may be migrating off base. The Navy was also informed on April 26, June 3, and June 20, that an amended RFI and CMS would be required. The requirement for an amendment to the RFI and CMS, when new contaminant information is received is universal to all RCRA facilities, therefore an RFI amendment must be completed.