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# Florida Department of Environment

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 7, 1992

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NAS PENSACOLA

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**CERTIFIED MAIL  
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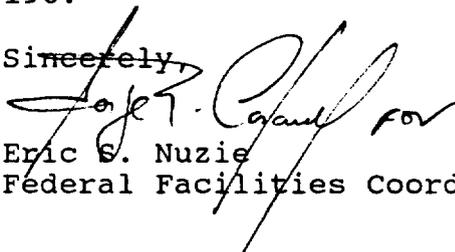
Ms. Linda Martin  
Code 1851  
Department of the Navy  
Naval Facilities Engineering Command  
Southern Division  
2155 Eagle Drive  
Post Office Box 10068  
Charleston, South Carolina 29411-0068

Dear Ms. Martin:

Department personnel have reviewed your responses to our comments on the Draft Site Management Plan for NAS Pensacola. Your responses did not adequately address our comments. I have enclosed a memorandum addressed to me from Mr. Jorge Caspary. It documents our comments that still need to be addressed. We would like to resolve these issues before the formal Dispute Resolution process is evoked per the NAS Pensacola Federal Facilities Agreement. We will cooperate with you in any way possible to meet your needs and still adequately address our concerns.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

  
Eric S. Nuzie  
Federal Facilities Coordinator

ESN/bb

Enclosure

cc: Jorge Caspary  
Bill Kellenberger  
Ron Joyner  
Allison Drew  
Satish Kastury



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# Interoffice Memorandum

TO: Eric S. Nuzie, Federal Facilities Coordinator  
Bureau of Waste Cleanup

THROUGH: Dr. James J. Crane, PGIII/Administrator *for JC*  
Technical Review Section

FROM: Jorge R. Caspary, P.G. *J.R.C.*  
Base Coordinator  
Technical Review Section

DATE: December '7, 1992

SUBJECT: Review of Navy's Responses to FDER Comments regarding  
Pensacola's Naval Air Station Final 1993 Site  
Management Plan.

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The above referenced responses have been reviewed and before the Site Management Plan can be considered final and approved by the Department, the following issues merit consideration and response by the Navy.

## General Comment

There seems to be a misunderstanding on the part of the Navy and its contractors concerning the **"screening"** concept. As soon as NAS Pensacola became listed on the National Priorities List, a procedural framework was developed which would ensure that past and present environmentally-related activities at the Base were thoroughly investigated following established guidelines and policies. It was then agreed by all three parties on the FFA that the Navy's proposal to "screen" potential sources of contamination using higher DQOs would best benefit the process by confirming or denying the presence of chemical constituents. The **"screening"** process was never intended to delineate or characterize contamination, for this would fall directly under the scope of a Remedial Investigation [(please see 40 CFR 300.430(b) and (d)]; however, some proposed workplans and responses presented to date convey the idea that the delineation and/or characterization effort will be accomplished during the so-called "confirmatory screening phase". The Department questions the wisdom of pursuing a characterization and/or delineation effort under the "screening" phase, for this falls under the scope of an RI/FS; therefore, the Department strongly encourages the Navy to revise the classification of some sites that have already had "screening" work performed and to consider performing any additional "confirmatory" work under the CERCLA RI/FS process.

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Specific FDER responses to Navy responses

- 1) There seems to be some confusion regarding the status of Sites 12, 13, 14, and 24. The Department approved the Final Phase II RI/FS workplans which included these sites for investigation under a full-scale RI/FS; however and regrettably, there seems to be a reversal of this earlier decision. This issue should be clarified and the Navy should provide reason for reversing the earlier decision. In addition, if enough contamination is detected at those sites such that it warrants a risk assessment, then the site falls under the RI/FS process according to the National Oil and Hazardous Substances Pollution Contingency Plan. Please note, a risk assessment report is not required for "screening" sites (please see 40 CFR 300.420). If however, the Navy agrees to do the work at these sites in accordance with all RI/FS required Data Quality Objectives (DQOs), the the Department would consider concurring with doing the investigations under the site screening process. Specific details would have to be agreed upon before final concurrence with this issue.
  
- 2) Likewise, there seems to be some confusion regarding the status of Site 36. It is the Department's position that the "screening" phase has accomplished its original intent, namely, to verify the presence or absence of contamination and in what quantities. In reviewing the technical reports prepared during the "screening" phase for this linearly large and complex site, it is clear that chemical constituents are present at certain locations in levels that exceed federal and state regulatory standards. Based on this observation, it would seem logical that the best course of action is to pursue the delineation stage of this effort under the scope of an RI/FS which will support the Baseline Risk Assessment (BRA). The Department strongly encourages the Navy to pursue this course'of action and modify Appendix A of the FFA accordingly.

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- 3) This response addresses the Department's comment regarding the proposed removal of petroleum-stained soil at the Oak Grove Campground. The comment was made in the context of Section XXIII of the FFA which states that "the SMP shall include the actions necessary to mitigate any immediate threat to human health or the environment". While the urgency of the threat presented by this site may be open to argument, it is the Department's position to encourage the implementation of immediate interim removal actions as appropriate to prevent potential exposure and to control the risks associated with this and other sites scattered across Navy installations throughout the State. The Navy has indicated its position not to include any Immediate Removal Actions within the scope of the Site Management Plan and as the lead agency, they can exercise this option; however, the Department strongly encourages that the data needed to determine the necessity and extent of the remedial action be as complete as possible. In addition, the Navy should consider not only potential exposure and risks associated with these sites but also the perception by the population living nearby these sites and around the Naval Air Stations that the Navy acts in a prompt and expeditious manner when situations like this arise. Please indicate an approximate date in which a plan with schedules that addresses this work will be available for review.