



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

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NAS PENSACOLA

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PLEASE ADDRESS REPLY TO THE
COMMANDING OFFICER, NOT TO
THE SIGNER OF THIS LETTER
REFER TO.

5090/13

Code 1851

20 Mar 95

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. David Clowes
Florida Department of Environmental Protection
Twin Towers Office Building

2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
MAR 22 1995

Subj: SITE MANAGEMENT PLAN, NAVAL AIR STATION PENSACOLA, FL

Dear Mr. Clowes:

The Navy respectfully submitted the Draft Final SMP to you at the Tier I Partnering meeting held at NAS Pensacola on February 24 1995. Comments from US EPA dated 01 Dec 1994 and from FDEP dated 09 December 1994 have been received and the following actions have been taken:

Comments from EPA stated the following:

1. A summary of comment 1 addresses two issues:

a: Ground water data collected near building 3380 detected concentrations of several solvents exceeding their respective Maximum Contaminant Levels (MCLs), therefore, a full remedial investigation and potentially remedial action must be performed for this site. The site may either be identified as Site 44, or "appended to an existing RI site.

Response: As agreed to at our Tier I partnering meeting held on 12 December 1994 this area will remain part of Site 36. The groundwater at this area, referred to as Site 3380, will require a BRA, thereby raising it to RI/FS status. Discussion was held and it was agreed to table the proposal (Initially Site 36 will be addressed through PA/SI process, upon completion of PA/SI, any portions easily identified as No Further Action will be dropped. The redefined Site 36 will be defined by the contaminants that will be required to go through the RI/FS process, including Site 3380 OR the site will be designated as a new site) until the Navy reports on this action item. During our Tier I conference call on 08 February 1995 it was agreed to follow the above approach since there is a possibility additional groundwater contamination along the industrial sewer line may be encountered during the Navy's investigation and may be compiled into one report. As agreed during this conversation Category 8, Site 36 (including the area associated with building 3380) will remain a screening site status. The description for Site 36 has been revised to indicate this action on page 62.

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b: Data collected to date for Site 14 appears to require a baseline risk assessment and additional sampling to evaluate whether or not the site presents a threat to human health or the environment. As discussed at the November Partnering Meeting, the site can therefore no longer be considered "screening" and must be upgraded to "RI" status.

Response: As agreed to at our Tier I partnering meeting held on 12 December 1994 this site will remain a screening site and the discussion to upgrade the status would be deferred until a data presentation scheduled for the February 1995 Partnering meeting which will include additional sampling results. As a result of the data presentation presented 24 February 1995 Site 14 will remain as a "screening" site at this time.

2. For clarification, please revise the second sentence of paragraph 3 on page 5 to read: "Based on the letter received from the US EPA dated 13 March 1992, only FDEP concurrence to modify the CRP is needed". EPA acknowledges and concurs with the Navy's plans to update the CRP, and looks forward to receiving a revised CRP which incorporates the many changes which have occurred since the CRP was last prepared, including programmatic changes, changes in DOD guidance, and changes in the concerns of the Pensacola community.

Response: The subject sentence has been revised to incorporate this comment, see page 5 of the February 1995 SMP.

3. For clarification, please specify that OU 2 originally consisted of only PSC 11. Also, PSC 30 was originally OU 5, not OU 3.

Response: This has been corrected as indicated on page 5 of the February 1995 SMP.

4. Please revise the text to clarify that the final status of each PSC (screening or RI) will be determined prior to report submittal, in order to avoid schedule delays in the submittal of RI Reports and/or the unnecessary preparation of Site Characterization Investigation Reports.

Response: As agreed to at our Tier I partnering meeting held on 12 December 1994 the phrase "the DoN shall incorporate these PSCs into existing OUs prior to the submittal of the RI report" has been inserted into the next to the last sentence of Section 4.0, page 10 of the February 1995 SMP.

5. General Comment: As discussed in a recent conference call, Section XXVIII. of the FFA states that each year's final "FY" SMP will provide deadlines and work priorities for completing each

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draft primary document "to be submitted in the following calendar year." Therefore, upon approval of an SMP by the Parties, the deadlines contained in that SMP remain in effect until December 31 of the corresponding calendar year (e.g. the **FY93** SMP specifies enforceable due dates for calendar year **1993**). Hence, any deadline missed in the September - December timeframe will require a formal extension request, regardless of any proposed schedule revision which appears in an annual SMP update submitted during that same time frame. For this year only, EPA will accept the Draft Final SMP as the Navy's formal request to extend the enforceable due dates for the following primary documents:

- OU 10: Draft FS Report
- OU 3: Draft RI Report
- OU 15: Draft Final RI Work Plan
- OU 16: Draft Final RI Work Plan
- OU 17: Draft Final RI Work Plan
- OU 6: Draft RI Report
- OU 8: Draft RI Report

In the future, formal extension requests must be submitted.

Response: The Navy concurs with this position and will submit an official extension request if required within the calendar year. The Navy also recognizes that since EPA has invoked dispute on this document we are operating without enforceable due dates for primary documents for this calendar year of **1995** until this Draft Final SMP has been approved by all Parties. In good faith, the Navy will comply with the due dates outlined in the Revised Draft Final SMP provided to you on February 24, 1995 at our Partnering meeting. (Note: As agreed upon during our conference call on February 27, 1995 a schedule is included as part of an errata for OU 10. See Enclosure (1).)

6. General Comment: As previously agreed to by the Parties, a final, formal response to comments will be submitted with the draft final primary document. However, in order to comply with the terms of Section VIII.G.5. of the FFA, some form of written response to EPA's and FDEP's comments must be received within sixty days of the close of the comment period. EPA recommends that the Parties discuss, and come to agreement on, the form and the timeframe for this response, at the next Partnering Meeting so that it can be included in the final revision of the FY95 SMP.

Response: As agreed upon during our conference call on February 27, 1995 a paragraph submitted by EPA will be added to the Draft final SMP provided to you February 24, 1995 by Enclosure (1).

7. Page 18: In general, the Draft FS should be submitted either after, or concurrently with, the Draft Final RI, since it is

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difficult to evaluate the adequacy of the FS until the RI is in near-final form. Please revise the schedule for OU 1, and any other schedules, as needed.

Response: The Draft Final SMP dated February 1995 provided to you February 24, 1995 has adjusted the schedules to comply with the comment.

8. Page 35: Combining all sites northeast of Chevalier Field into a single OU should facilitate the Parties efforts to conduct a more coordinated investigation and remediation of this area. However, EPA is concerned at the scheduling delays which have been incurred by adding the relatively low-priority PSCs 12 and 26 to OU 2. Specifically, the Draft RI Report for this high-priority OU will now be submitted only two months before the Draft RI Report for the Low-priority Category 6 sites. This delay could also lead to data-useability problems with some of the earliest-collected data for these sites. Since most of the data for sites 11, 25, 27, 30, and 31 is already available, EPA encourages the Navy to schedule data presentations and propose Interim Remedial Actions and/or Removals as soon as possible for appropriate portions of OU 2.

Response: The Navy does not understand EPA's concern with scheduling delays at this time. It was agreed by all Parties that this was the most effective way to combine these sites because of the geographic proximity of the sites. Data-useability should not be a problem since the bailer technique used for the sampling at sites 11, 25, 27, 30, and 31 would be a worst case scenario compared to the parastatic low-flow technique sampling being used at sites 12 and 26. The RI report is to be a snapshot in time to establish the chemicals of concern and the area of contamination with the results incorporated into risk assessments for both human and ecological effects. These results would then be incorporated into a FS Report which would propose remedial actions acceptable to bring this OU within acceptable limits. The Navy has proposed removals for appropriate portions of OU 2 but will not pursue without concurrence by all Parties to insure actions will not invoke resubmittal of primary documents due to changes of current site conditions.

Comments received from FDEP stated the following:

1. The primary reason Site 3380 was placed into Category 8, PSC 36, was not because suspected source is the industrial sewer line, but for administrative convenience. Presently, the source of the solvent groundwater contamination is unknown, requiring additional assessment.

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Response: The Navy concurs and has stated additional groundwater assessment is necessary during each data presentation presented to date. For clarification, this area was placed into Category 8, PSC 36 by consensus from all Parties because of the fiscal close proximity of the industrial sewer line and was the suspected source at the time this discussion was made. Our investigation has indicated our assumption was not correct and the source may be the bilge water treatment line located within this area which was unearthed during the surface soil clean-up efforts.

2. With groundwater contamination, unidentified source and the need for further assessment at Site 3380, I recommend that PCS 36 be transferred from screening to RI/FS status.

Response: As agreed to at our Tier I partnering meeting held on 12 December 1994 this area will remain part of Site 36. The groundwater at this area, referred to as Site 3380, will require a BRA, thereby raising it to RI/FS status. Discussion was held and it was agreed to table the proposal (Initially Site 36 will be addressed through PA/SI process, upon completion of PA/SI, any portions easily identified as No Further Action will be dropped. The redefined Site 36 will be defined by the contaminants that will be required to go through the RI/FS process, including Site 3380 OR the site will be designated as a new site) until the Navy reports on this action item. During our Tier I conference call on 08 February 1995 it was agreed to follow the above approach since there is a possibility additional groundwater contamination along the industrial sewer line may be encountered during the Navy's investigation and may be compiled into one report. As agreed during this conversation Category 8, Site 36 (including the area associated with building 3380) will remain a screening site status. The description for Site 36 has been revised to indicate this action on page 62.

Enclosure (1) incorporates additional comments to the February 1995 Draft Final SMP provided to **you** 24 February 1995 based on our 27 February 1995 Tier I Partnering Team conference call.

If you should have any questions regarding the enclosure, please contact Bill Hill (Code 1851) or Bill Gates (Code 18510), at (803) 743-0324 or (803) 743-0360 respectively.

Sincerely,



WILLIAM J. HILL
Environmental Engineer
Installation Restoration I Branch

Subj: SITE MANAGEMENT PNA, NAVAL AIR STATION PENSACOLA, FL

Encl :

(1)Errata to Draft Final 1995 SMP dated 20 March 1995

copy to:

NAS Pensacola (Mr. Ron Joyner, Code 00500) w/encl

NAS Pensacola (Ms. Michele Harrison) w/encl

Ensafe (Mr. Henry Beiro) w/encl

Ensafe (Mr. Brian Caldwell) w/encl

Bechtel (Mr. Larry Trautner) w/encl