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NAS PENSACOLA
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DRAFT FACT SHEET NUMBER 13 REGARDING EXPLANATION OF SIGNIFICANT
DIFFERENCES SITES 32, 33 AND 35 NAS PENSACOLA FL
5/1/1998
NAS PENSACOLA



Naval Air Station Pensacola Installation Restoration Program (IRP)

This is one in a series of fact sheets informing interested citizens about the environmental investigations and remedial actions at NAS Pensacola. Other fact sheets will be written at appropriate points in the program and in response to public interest. Distribution is coordinated through the Public Affairs Office at NAS Pensacola, (850) 452-2311.

DRAFT FACT SHEET 13: U.S. Navy Explanation of Significant Differences Operable Unit 10 (Sites 32, 33, and 35), Naval Air Station, Pensacola

Introduction

This fact sheet explains the significant differences between the selected remedy for environmental concerns at Operable Unit 10 (Sites 32, 33, and 35) of Naval Air Station Pensacola, and the actual remedy that will be implemented by the U.S. Navy in completing the site remediation.

The Navy is required to issue an Explanation of Significant Difference (ESD) when it modifies any remedy documented in a Record of Decision (ROD). This ESD covers Operable Unit 10, as required under the public participation rules of Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act, Section 300.435(c)(2)(i) of the National Contingency Plan. This ESD also is part of the site's Administrative Record (AR), which contains the ROD and background information on which the remedy initially was selected.

The Navy, with U.S. Environmental Protection Agency (USEPA) and Florida Department of Environmental Protection (FDEP) concurrence, selected a remedy for OU 10 in June 1997 – as described below – and documented the action in the ROD, the report explaining remedy selection at NAS Pensacola.

Upon further review of the remediation goals and that the groundwater corrective action is being conducted in accordance with the RCRA corrective action plan, the Navy, with USEPA and FDEP concurrence, is eliminating the five-year review criteria from the ROD. Therefore, the Navy is issuing this document under the public participation requirements cited earlier. The ROD is available for public review at the libraries listed on Page 2.

OU 10 Remediation and Assessment

OU 10 is on Magazine Point at the Naval Air Station (NAS) Pensacola, in Escambia County, Florida. OU 10 comprises three sites: the former Industrial Sludge Drying Beds (ISDBs; Site 32); the former Wastewater Treatment Plant Ponds including the former surge pond, stabilization pond, and polishing pond (Site 33); and miscellaneous Industrial Wastewater Treatment Plant Solid Waste Management Units (SWMUs; Site 35) which are listed in the ROD. Except for the Industrial Wastewater Treatment Plant (IWTP) conversion to domestic wastewater treatment only in October 1995, no other use changes are expected for Magazine Point.

Between December 1992 and October 1995, a remedial investigation was performed at OU 10. The RI was designed to assess the nature and extent of contamination to support a remedy selection. Fieldwork for the RI included installing monitoring wells and sampling soil, sediment, surface water, and groundwater.

In 1994 and 1995, a time-critical removal action was performed on the Imhoff tank north of the IWTP. Approximately 148 tons of hazardous waste were removed from the tank. In addition, 619 tons of nonhazardous soil, gravel, and construction debris were removed and landfilled. Confirmatory samples collected at the extent of the excavation did not detect volatile organic compounds, semivolatile organic compounds, or polychlorinated biphenyls. Metals and pesticide concentrations detected were below preliminary remedial goals.

Selected Remedy

The selected remedy for OU 10 included the following elements:

- Excavation and disposal of soil in which contaminants exceeded residential soil preliminary remediation goals (Area A)
- Leachability study on Areas B, C, and D to verify that contaminants remaining in soil are not leaching to groundwater
- Contingency remedial action of Areas B, C, and D to include excavation and disposal of soil that the leachability study verifies as a source of groundwater contamination
- The remedial design for groundwater treatment was developed in the Corrective Action Plan for the Resource Conservation and Recovery Act (RCRA) permit modification (Permit HF17-292641 issued 9/26/97)
- Groundwater monitoring program to ensure the groundwater treatment system will be effective and that contaminants will not migrate
- Continued groundwater monitoring at sampling intervals to be determined during the remedial design for groundwater treatment developed in the Corrective Action Plan for the RCRA permit modification. The groundwater monitoring program will continue until a five-year review concludes that the alternative has achieved the performance standards and remains protective of human health and the environment. This remedy was presented in the June 1997 OU 10 ROD

Significant Difference

The significant difference to the ROD involves deleting the five-year review under CERCLA. Soil excavation has been completed in accordance with the ROD and is documented in the Remedial Action Completion Report.

The significant difference to the ROD is the deletion of the five-year review. The review was included in the ROD to provide for CERCLA oversight of the groundwater cleanup.

OU 10 meets the criteria established in 62 FR 62523 to defer the site to the RCRA program. Performance standards for CERCLA were included in the RCRA Corrective Action Plan. The RCRA corrective action would therefore afford equivalent protection to a CERCLA action. Response under RCRA is progressing adequately, and successful completion of the RCRA corrective action would eliminate the need for further cleanup under CERCLA. This change will provide cost savings, while protecting human health and the environment.

Support Agency Comments

The Navy, USEPA, and FDEP have agreed to delete the five-year review.

Affirmation of Statutory Determination

The Navy, USEPA, and FDEP believe the remedy, with the considered change, protects human health and the environment, complies with federal and state requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action at the time the original ROD was signed, and is cost-effective.

Administrative Record and Information Repository

This ESD will become part of the AR for OU 10, which may be reviewed at the following locations:

NAS Pensacola Library

Building 633

M-F 8 a.m. to 6 p.m.

Sat 9:30 a.m. to 5 p.m.

Closed every Saturday in July

Closed Sundays

John C. Pace Library,

University of West

Florida

M-Th 8 a.m. to 9 p.m.

Fri 8 a.m. to 5 p.m.

Sat 9 a.m. to 5 p.m.

Sun 1 p.m. to 5 p.m.

Point of Contact

For details, please contact:

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