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LETTER REGARDING REVIEW AND COMMENTS ON DRAFT FEDERAL FACILITY
AGREEMENT SITE MANAGEMENT PLAN 2012 NAS PENSACOLA FL
9/7/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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September 7, 2011

Ms. Patty Marajh-Whittemore
Naval Facilities Engineering Command Southeast
IPT, Gulf Coast
Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Federal Facilities Agreement Site Management Plan, Calendar Year 2012 for
Naval Air Station Pensacola, Pensacola, Florida.

Dear Patty:

The Department has reviewed the Draft Federal Facilities Agreement Site Management Plan, Calendar Year 2012 for Naval Air Station Pensacola, dated August 2011 (received August 31, 2011), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the document:

- (1) The title page of the document would indicate the Site Management Plan covers Fiscal Year 2012, but the transmittal page to the document, the text within the document and the Appendices with the program schedule all refer to Calendar Year 2012.
- (2) On page 1-2, Section 1.2, it states that the Preliminary Assessment identified 10 "other than operational" ranges at NAS Pensacola and that in 2010, the Navy initiated Site Inspections at all 10 of the sites. According to our records, Site Inspections were only conducted at 7 of the sites. Those included the Fort Barrancas Rifle Ranges 1 and 2A/2B, the Magazine Point Rifle Range, the Magazine Point Bombing Target, the National Cemetery Gunnery Area South, the Sherman Field Rifle Range, the Fort Redoubt Skeet Range and the National Cemetery Skeet and Trap Ranges. Three ranges listed in Section 2, Table 1, Site Description Chart, as being in the Site Inspection Regulatory Status were not investigated except possibly in the Preliminary Assessment phase. These include the Chevalier Field Machine Gun Range, the Chevalier Field Pistol Range and the

National Cemetery Gunnery Range Area North. Please make sure that the Site Management Plan correctly identifies the status of all the ranges.

- (3) On page 2-1, Section 2.2, third sentence, please remove the “)” after “SI”.
- (4) On page 2-6, Table 1, in the description of OU 1, first paragraph, last sentence, please change “disposed of the PSC 1” to “disposed at PSC 1”.
- (5) On page 2-7, Table 1, in the description of OU 2, PSC 11, first paragraph, last sentence, I believe it should say “did not indicate increased toxicity in Wetland 64 leading **into** Bayou Grande.” Also, I am not sure why the fact that toxicity of sediment does not increase as one moves from the source of contamination (Wetland 64) into the larger water body (Bayou Grande) should matter. I would think that it would be expected.
- (6) In Table 1, in the description of OU 2, PSCs 11, 12, 25, 27 and 30, it mentions that “Inorganics detected in excess of NAS Pensacola background Reference Concentrations included . . .” It does not identify the medium, whether soil or groundwater.
- (7) In the description of OU 2, PSCs 11, 12, 25 and 30, in Table 1, a summary of groundwater contaminants that were detected seems to be missing. Also, there does not seem to be any mention of a groundwater monitoring plan or remedy for groundwater associated with those PSCs.
- (8) Some of the site descriptions in Table 1 need clarification or fixing. I will give two examples. For OU 6, PSC 29, it says workers received skin burns from a “black slimy liquid” in the soil. It goes on to say that the types of chemicals involved and extent of contamination are unknown but that the site received a NFA ROD in 1999. Secondly, for PSC 34, it discuss contamination of soils and groundwater that may have occurred because of a solvent detergent release, that may have penetrated beneath the apron via the expansion joints. It goes on to discuss how “these PSCs” were grouped together and prioritized but does not identify which PSCs are being discussed. The PSC 34 site description indicates the site is contaminated but the regulatory status has it as receiving NFA in 2000.
- (9) The References given for the Site Management Plan do not seem to mesh with the report. Two Remedial Investigation Reports, two Records of Decision, a Groundwater Monitoring Plan and an Initial Assessment Study are referenced.

- (10) In Appendix A, Table A-1, I have the following comments:
- a. For OU 1, Site 1, the first Draft 2014 Annual Monitoring Report should be the Draft 2013 Annual Monitoring Report.
 - b. For OU 11, Site 38, it has no primary or secondary documents being received in calendar year 2012.
 - c. OU 13, Sites 8 and 24 is not listed in Table A-1 and is mistakenly put in Table A-2.
 - d. For Basewide, please add LUC Inspection Reports.

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Tim Woolheater, EPA Region 4, Atlanta
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