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LETTER REGARDING REVIEW OF U S NAVY RESPONSES WITH ADDITIONAL
COMMENTS ON FEDERAL FACILITY AGREEMENT SITE MANAGEMENT PLAN FOR 2012
NAS PENSACOLA FL
11/10/2011
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

November 10, 2011

Official Correspondence – This electronic message is being sent in lieu of regular mail

4SF/FFB

Ms. Patty M. Whittemore
Remedial Project Manager
SOUTHNAVFACENGCOM
NAS Jacksonville Building 103
Jacksonville, FL 32212

Re: EPA Review of the Response to EPA comments on the
Federal Facility Agreement Site Management Plan, FY 12

Dear Ms, Whittemore:

The United States Environmental Protection Agency has received and reviewed the above referenced document. EPA would still like to continue the discussion on 2012 targets for certain sites to project expected progress on the site. The targets may relate to non-primary documents. The EPA comments on the Navy responses are provided below:

1. Off-range: Not sure the RTC's addressed the issue. Off-range releases were only part of the request. The other portion had to do with the "other than operational range issues. Please clarify where these are addressed in the SMP. In addition, please verify that a groundwater monitoring well evaluation is the basis for discussion regarding the lack of an off-site release from "The Range."
2. Table 2 and paragraphs in Section 2 are much improved and add significant clarity to the report. There would appear to be 12 sites that are not included in the first 2 paragraphs on page 2-2 that are part of Table 2. The majority (10) are no action at the site characterization phase (PSC 4, 5, 7, 10, 13, 14, 16, 18, 28, and 36). Another site (PSC 34) is no action based on a letter dated 8/18/99 though the exact process leading to that letter and who it is from is unclear. Finally, PSC 41 (Wetlands) is not addressed as being elevated to RI/FS.
3. Cmt 8a: Table 1 was edited to remove the discussion on the need for an ESD. This needs to be included in the document. I concur with limiting some of the discussion in the table although there is need to ensure that the next steps for a site are part of the site management plan. A

section right after 2.3 may be appropriate to link the OU's in Section 2.3 with the milestones presented in Appendix A.

4. Cmt 8b and Table A-1 for OU2: The RACR label in the table should add a word to ensure clarity (i.e. soils, radiation, ...) EPA wonders whether addressing the GW within the RACR would be of merit. This would delay the RACR. An Interim RACR for GW will be required in the milestones, as well.
5. The Interim RACRs apply to all gw sites that include monitoring. This allows the RA to close from a construction perspective and remain open until the site meets RAO's. This would apply to OU 1, 2, 4, 11, 13, and/or any other sites that have construction activities closed out if they haven't been completed.
6. Cmt 8d and g (OU6 and 12): ESDs or RAD amendments will be required to lower the As standard at each of the sites where 50 ug/L was established as the remedial goal in groundwater.
7. Additional TableA-1 comments: Site OU 20 and 21 will require RA milestones.

Should any of the above comments require clarification, please contact me at 404-562-8510 or woolheater.tim@epa.gov.

Sincerely,

Timothy R. Woolheater
Senior Remedial Project Manager
Federal Facilities Branch

CC: Mr. David Grabka, FDEP