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NAS PENSACOLA  
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LETTER REQUESTING EXTENSION OF SUBMITTAL OF DRAFT FINAL SAMPLING AND  
ANALYSIS PLAN FOR GROUNDWATER MONITORING WORK PLAN NAS PENSACOLA FL  
2/17/2012  
NAVFAC SOUTHEAST



**DEPARTMENT OF THE NAVY**  
Naval Facilities Engineering Command Southeast  
Jacksonville, FL 32212-0030

**Memorandum for the file**

**Date:** February 17, 2012

**Subject:** Extension of Calendar Year 2012 NAS Pensacola Site Management Plan (SMP)  
Deadlines, Extension Number 2012-006.

**From:** Patty Marajh-Whittemore, Navy  
David Grabka, FDEP  
Tim Woolheater, USEPA Region 4

**To:** File

In accordance with Part XXIII of the October 23, 1990, Federal Facilities Agreement, deadlines established in the SMP may be extended pursuant to part XXIV. Below is a request for extending a deadline date in accordance with Part XXIV, paragraph A.1-4 as agreed to by the parties and is extended in accordance with paragraph E. The change recorded in this memo will be reflected in the calendar year 2012 Final SMP update submitted December 1, 2011.

1. **OU/SITE Number & Description :** OU 19, Site 44 – Former UST Site 3221
2. **Deadline or schedule being extended :** Submittal of the Draft Final Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) Groundwater Monitoring Work Plan for Operable Unit (OU) 19, Site 44 Feasibility Study Addendum.
3. **Length of extension/new deadline:** 60 days from March 1, 2012 to April 30, 2012.
4. **Good Cause**
  - Force Majeure
  - Another Parties failure
  - Dispute Resolution
  - Delay caused by extension granted for other deadline
  - Events or series of events mutually agreed to by the Parties
5. **Brief description/Explanation of cause:**

The Navy submitted to the regulatory agencies for review the Response to Comments for regulatory comments received on the Federal Facilities Agreement (FFA) Primary Document

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titled "Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) Groundwater Monitoring Work Plan for Operable Unit 19 (Site 44) Feasibility Study Addendum Naval Air Station (NAS) Pensacola, Pensacola, Florida". The Response to Comments document was submitted on November 1, 2011. On December 20, 2011; the Navy, U.S. Environmental Protection Agency (EPA), and Florida Department of Environmental Protection (FDEP) completed a conference call and discussed the path forward. The EPA provided specific comments on the Response to Comments document on the same day. Comments or approval from FDEP has not yet been received. Additional comments were received from EPA requesting that soils samples be added to the Feasibility Study Addendum Work Plan and that soil and groundwater samples be analyzed for Target Analyte List (TAL) and Target Compound List (TCL) parameters. During a conference call on January 10, 2012, the Navy agreed to the request. An additional comment was received from EPA on February 13, 2012 requesting that laboratory analysis for hexavalent chromium be added to the Feasibility Study Addendum Work Plan.

The NAS Pensacola FFA specifies that Draft Final Primary Documents will be submitted 60 days following submittal the Response to Comments document. The original Draft Final document due date was December 31, 2011. However a 61 day milestone extension was requested by the Navy on December 21, 2011 and later approved which extended the due date to March 1, 2012. Therefore the current due date for the Draft Final Document is March 1, 2012. Because of the additional specific comments from EPA on the Response to Comments was not received in a timely manner and will require sampling and analysis of additional media and specialized laboratory analysis and because comments or approval have not been received from FDEP; the Navy requests a milestone schedule extension of 60 days with a proposed revised submittal date for the Draft Final Document from March 1, 2012 to April 30, 2012. This schedule extension will also extend the milestone due dates for the Final Feasibility Study Addendum Work Plan and future documents including the Feasibility Study Addendum, Proposed Plan, Record of Decision, and Remedial Design. A revised Milestone Schedule that reflects the 60 day schedule extension is attached.

The 60 day extension will allow:

- Evaluation and incorporation of the addition of the soil media into the Response to Comments and revision of the Draft Feasibility Study Addendum Work Plan (UFP SAP).
  - Evaluation and incorporation of soil and groundwater analysis for TAL and TCL parameters and hexavalent chromium into the Response to Comments and revision of the Draft Feasibility Study Addendum Work Plan. The inclusion of hexavalent chromium in the document will require the procurement of an additional laboratory for the
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specialized analysis.

- Adequate time for regulatory review of the revised Response to Comments document and revised Draft Feasibility Study Addendum Work Plan which in addition to the above change will also be revised from a Tier II Work Plan (UFP SAP) to a Tier I Work Plan (UFP SAP) type. The Navy will wait on comments or approval of the revised Draft Feasibility Study Addendum Work Plan before submittal of the draft final version.
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**IT IS SO AGREED**

  
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Patty Marajh – Whittemore  
Remedial Project Manager  
NAVFAC SE

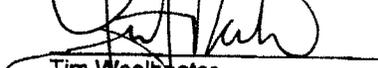
2/17/2012  
Date

  
\_\_\_\_\_  
David Grabka  
Remedial Project Manager  
Florida Department of Environmental Protection

2/17/12  
Date

Timely

Good Cause

  
\_\_\_\_\_  
Tim Woolheater  
Remedial Project Manager  
USEPA, Region 4

2/22/12  
Date

Timely

Good Cause





