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NAS PENSACOLA  
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LETTER REGARDING CONCURRENCE OF AN EXTENSION FOR SUBMITTAL OF  
RESPONSE TO COMMENTS ON DRAFT REMEDIAL ACTION WORK PLAN SITE 43 NAS  
PENSACOLA FL  
2/21/2012  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

February 21, 2012

Ms. Patty Marajh-Whittemore  
Remedial Project Manager  
ITP Gulf Coast  
Naval Facilities Engineering Command Southeast  
Attn: AJAX Street, Building 135N  
P.O. Box 30A  
Jacksonville, FL 32212-0030

RE: Extension to Submit the Draft Remedial Action Work Plan for Operable Unit (OU) 18, Site 43, Naval Air Station Pensacola, Pensacola, Florida.

Dear Patty:

The Department has received the Navy's request for an extension from January 13, 2012 to April 12, 2012 to submit the Draft Remedial Action Work Plan for Operable Unit (OU) 18, Site 43, Naval Air Station Pensacola. The request was submitted pursuant to Section XXIII of the NAS Pensacola Federal Facilities Agreement and was received by the Department on February 13, 2012. The Navy has requested the extension to further evaluate the soil leaching procedures proposed by EPA and to incorporate the revised leaching procedure into the Remedial Action Work Plan and UFP SAP for Site 43. While the request for this extension might have been deemed untimely, the Department considers there to be sufficient cause to grant the extension. Further, the document in question is not clearly covered as a primary document subject to deadlines specified in the Site Management Plan for the base. Therefore, pursuant to Section XXIV of the NAS Pensacola Federal Facilities Agreement, the Department concurs with the requested extension. I have attached a signed copy of the Extension Memorandum to this letter.

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

Ms. Marajh-Whittemore  
Extension Request, OU 18, Site 43  
February 21, 2012  
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**DEPARTMENT OF THE NAVY**  
Naval Facilities Engineering Command Southeast  
Jacksonville, FL 32212-0030

**Memorandum for the file**

**Date:** February 13, 2012

**Subject:** Extension of Calendar Year 2012 NAS Pensacola Site Management Plan (SMP) – OU 18, Site 43 – Demolition Debris Disposal area.  
Deadlines, Extension Number 2012-005.

**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 :** Operable Unit (OU) 18, Site 43 Demolition Debris Disposal Area.
2. **Deadline or schedule being extended:** Submittal of the Draft Remedial Action Work Plan for OU 18, Site 43 Naval Air Station (NAS) Pensacola, Pensacola, Florida.
3. **Length of extension/new deadline:** 90 day extension for preparing the Draft Remedial Action Work Plan from January 13, 2012 to April 12, 2012. The schedule extension also affects document delivery dates for the Remedial Action Completion Report.
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:**

On December 13 and 14, 2011; the Naval Air Station Pensacola Partnering Team held a quarterly Team meeting and during the discussions it was determined that the US Environmental Protection Agency (EPA) would require an additional analytical tests for soil leachability instead of the Synthetic Precipitation Leaching Procedure (SPLP) EPA method 1312. Various discussions ensued however it was unclear as to what alternate analytical method should be completed. The Navy initiated a conference call on February 8, 2012 between the Navy, EPA and the Florida Department of Environmental Protection (FDEP) to discuss the use of SPLP and additional leaching procedures and as a result of the conference call, EPA provided a memo with suggested guidance for the evaluation of the potential for soil contaminants to leach to groundwater. However because the additional analytical procedures will require further evaluation and incorporation into the Remedial Action Work Plan, the Navy requests a milestone schedule extension of 90 days with a proposed revised submittal date for the Draft Remedial Action Work Plan from January 13, 2012 to April ~~20~~<sup>12</sup>, 2012. A revised Milestone Schedule that reflects the 90 day schedule extension is attached.

The 90 day extension will allow:

- A further evaluation and further discussions of the soil leaching procedures proposed by EPA
- Incorporation of the revised soil leaching procedure into the Remedial Action Work Plan and UFP SAP

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**IT IS SO AGREED**

  
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Patty Marajh – Whittemore  
Remedial Project Manager  
NAVFAC SE

2/13/2012  
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

\_\_\_\_\_  
Date

Timely       Good Cause