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NAS PENSACOLA
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LETTER AND CONCURRENCE FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING EXTENSION TO SUBMIT DRAFT FINAL REMEDIAL ACTION
WORK PLAN OPERABLE UNIT 18 (OU18) SITE 43 NAS PENSACOLA FL
7/25/2012
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

July 25, 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 18,
Site 43, Naval Air Station Pensacola, Pensacola

Dear Patty:

The Department has received the Navy's request for a 25 day extension from July 30, 2012 to August 24, 2012 to submit the Draft Remedial Action Work Plan for Operable Unit 11, Site 38, 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 by e-mail on July 25, 2012. 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

KAW



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

Memorandum for the file

Date: July 24, 2012

Subject: Extension of Calendar Year 2012 NAS Pensacola Site Management Plan (SMP)
Deadlines, Extension Number 2012-049-020

From: Patty Marajh-Whitemore, 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 (RAWP) and Uniform Federal Procedure Sampling and Analysis Plan (UFP-SAP) for OU 18, Site 43, Naval Air Station (NAS) Pensacola, Pensacola, Florida.
3. **Length of extension/new deadline:** 25-day extension for submitting the Draft RAWP from July 30, 2012 to August 24, 2012 due to reasons detailed in item 5 below. The 92-day extension for submittal of the Draft Remedial Action Completion Report (RACR) from September 30, 2012 to December 31, 2012 which was requested in the previous extension letter dated June 28, 2012 remains unaffected by the above 25-day extension request for submittal of the Draft RAWP.
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 had previously requested an extension for the deadline to submit the Draft Remedial Action Work Plan (RAWP) for OU18, Site 43 in a Memo to File dated June 28, 2012 indicating a submittal date of July 30, 2012 for the Draft RAWP. This extension was requested to allow the Navy enough time to incorporate consensus items arrived at by the NAS Pensacola Partnering Team (the Team) members during the June 13, 2012 NAS Pensacola Partnering Team meeting on the approach for delineation of lead contamination in soil using X-ray Fluorescence (XRF) field screening and fixed-base laboratory analysis using the Synthetic Precipitation Leaching Procedure (SPLP), into the Draft UFP-SAP. Additionally, the extension was to provide time to incorporate procedures related to ordnance safety as required by the Navy's ordnance safety organization (Naval Ordnance Safety and Security Activity (NOSSA) into the Draft RAWP.

Previously materials presenting a potential explosive hazard (MPPEH) were unearthed at the site during interim removal actions in 2002, and recognized as belonging to the Civil War era, with some munitions artifacts recognized in the field to have intact fuses. As a result, the probability of encountering such MPPEH at the site has been deemed by NOSSA to be higher than previously anticipated. Due to the unavailability of published literature on various safe distances, etc. associated with these Civil War era MPPEH, the Navy needs additional time to calculate various safe distances and incorporate procedures related to safe distances, exclusion zones, etc. in the Draft RAWP. Therefore, the Navy requests a milestone schedule extension of 25 days for the Draft RAWP from July 30, 2012 to August 24, 2012. A revised Milestone Schedule that reflects the 25-day schedule extension is attached.

Additionally, submittal of the Draft UFP-SAP (secondary document) which was earlier slated for July 13, 2012 has experienced delays by the Navy's contractor due to extended review times and laboratory responses. The Draft UFP-SAP will now be submitted on or before July 31, 2012.

The 25-day extension for the Draft RAWP will allow:

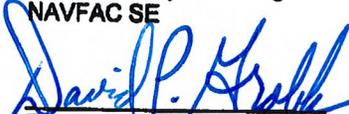
- Incorporation of the field safety procedures related to MPPEH that may be encountered during the pre-excavation sampling, well installations and soil excavations. .

IT IS SO AGREED



Patty Marajh – Whittemore
Remedial Project Manager
NAVFAC SE

7/24/12
Date



David Grabka
Remedial Project Manager
Florida Department of Environmental Protection

7/25/12
Date

Timely

Good Cause

Tim Woolheater
Remedial Project Manager
USEPA, Region 4

Date

Timely

Good Cause