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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT SITE  
MANAGEMENT PLAN 2013 NAS PENSACOLA FL  
10/1/2012  
U S EPA REGION IV



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

October 1, 2012

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 OU 2013 Draft Site Management Plan

Dear Ms, Whittemore:

The United States Environmental Protection Agency has received and reviewed the above referenced document. The EPA comments on the Pensacola SMP are provided enclosed. EPA also reviewed the Exit Strategy and the Site schedule to determine whether these are consistent with the Site Management Plan.

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

Sincerely,

Timothy R. Woolheater  
Senior Remedial Project Manager  
Federal Facilities Branch

CC: Mr. David Grabka, FDEP

**EPA's Review of the  
2013 Draft Site Management Plan  
Naval Air Station Pensacola  
August 2012**

This review is divided into two parts; a review of the text and tables of the SMP itself and then a review of the Appendix Milestone schedule concurrently with the Exit Strategy and the Schedule (9-14-12).

**Part 1: Review of the SMP text and Tables**

1. **Section 2.4, Active Operable units, OU 4:** The last sentence should be deleted as it appears to be part of the site discussion which EPA is awaiting the Navy response. As further clarification, the previous MCL of 50ppb is outside EPA's risk range and therefore the use the current standard of 10 is required. There must be a decision document that specifies the new cleanup level for arsenic. At a minimum, ESD should be issued to reflect the change in cleanup level and indicate whether existing remedy is expected to address the arsenic in GW. This ay require modification to remedy if not.
2. **Section 2.4, Active Operable units, OU 16:** The description should be a bit more specific considering the efforts this fiscal year.
3. **Section 2.4, Active Operable units, OU19:** The description should be updated.
4. **Section 2.4.1, Additional Significant Items, first paragraph:** The paragraph mentions "recent requests" from EPA and "NCP acknowledge concept of freezing ARARs..." EPA made these requests during the last discussion of the SMP which is not recent. In addition, since the ARAR (arsenic) is no longer protective the remedy is no longer protective and the remedy must be appropriately addressed. These types of discussions are best addressed through the work at the site and not in the SMP. The phrase should be deleted or revised.
5. **Section 2.4.1, Additional Significant Items, second paragraph:** The paragraph mentions that remedial construction activities were previously completed and that interim RACRs were not required. Interim RACRs were required at the time of the completions; however, they were not completed. EPA is requesting that they be completed to bring the site up-to-date. These types of discussions are best addressed through the work at the site and not in the SMP. The phrase should be deleted or revised.
6. **Site Description Chart, Table 1, PSC 1:** The ROD was completed in 1998 and construction activities have been completed for some time. It is suspected that the site is in Long-Term Remedial Action (LTRA) which begins once the interim RACR is completed. This will allow the site to be considered complete until the remedial action goals are achieved. The regulatory status

should reflect the current phase. This particular comment would appear to be appropriate for other PSC's, as well.

7. **Site Description Chart, Table 1, PSC 7:** Please explain whether any sampling was ever performed at the site. Fire Training areas are notorious for operations that cause significant groundwater issues. It is unclear whether a preliminary screening program would provide the level of scrutiny that would detect the contamination from these types of activities. In the response to these comments, please clarify the PSCR activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.
8. **Site Description Chart, Table 1, PSC 8:** It is unclear what the site's ROD recommended and whether the site is being investigated in the MMRP program. Please revise the description.
9. **Site Description Chart, Table 1, PSC 18:** An IAS (acronym undefined) assumed that "no immediate cleanup effort was conducted." The statement suggests that a cleanup effort is needed except for the PSCR being no further action. Please add a statement that allowed the change in site status from 1966 to 2000.
10. **Site Description Chart, Table 1, PSC 28:** The site description relates transformer oil being spilled with possible PCBs washing into a nearby storm drain. The 1997 PSCR is NFA. It is unclear whether a preliminary screening program would provide the level of scrutiny that would detect the contamination from these types of activities. In the response to these comments, please clarify the PSCR activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.
11. **Site Description Chart, Table 1, PSC 29:** The site description suggests that the types and extent of contamination are unknown. Since a ROD was completed it is expected that this statement is no longer true. In the response to these comments, please clarify the site activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.
12. **Site Description Chart, Table 1, PSC 34:** The site description has contamination being carried off-site. The site is only listed as NFA. In the response to these comments, please clarify the site activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.
13. **PSC and Site Status, Table 2, PSC 1:** Please update the site information comments to reflect the remedy re-evaluation ongoing.

14. **PSC and Site Status, Table 2, PSC 7:** The comments are different than the regulatory status of Table 1. The site has had a removal action though it is unclear whether the standards for the action were consistent with standards that may be applicable under remedial actions.
15. **PSC and Site Status, Table 2, PSC 10 and 18:** Please explain the difference between a "Completion Report" for PSC 10 and a PSCR. If this is the Removal Action Report, please explain whether the standards for the removal actions (at 10 and 18) are as protective as those required during a remedial action. This would include the potential need for land use controls.
16. **PSC and Site Status, Table 2, PSC 13 and 14:** Please explain the difference between the PSCRs and the Site Characterization Reports that appear to have been completed at different dates. If the SCR include sampling then this would suggest that other site with only PSCR did not include sampling and raises question of protectiveness of those sites. Please clarify.

## **Part 2: Review of the Exit Strategy (IR Site Detail Table)/ SMP/ and current schedule (9-14-12)**

### OU 1

#### Exit Strategy:

1. Please add a date to the comment field for the regulatory approval of the iron value.

#### Schedule

1. It is unclear why the Annual monitoring reports are being submitted 8 to 9 months after the calendar year ends. It would appear that the SMP is more appropriately scheduled.
2. It is also unclear why the baseline dates and the actual finish dates (for future tasks) are different. EPA will assume that the baseline dates are being revised for the new 2013 SMP.
3. The Draft FS is scheduled for Jan 2013 (See line 89). The Draft proposed plan should begin preparation thirty days after the Navy begins review of the regulatory comments on the draft FS (Line 91). This would tighten the schedule a bit by allowing the DF FS and the Dft PP to be submitted at the same time. The schedule appeared to accommodate this efficiency in the past but was not included in the current baseline schedule.
4. The same schedule layering should be considered for the PP-ROD, ROD-RD, and RD-RAWP.

#### SMP Milestones:

1. Revise per the comments above on the schedule.

## OU 2

### Exit Strategy:

1. The comment field suggests that only LTM is being completed while the remedy calls for MNA. Please revise.
2. Site 12: There would appear to be a need for further excavations at Site 12. Please update with plan date for these excavations.
3. Site 27: Please explain the SS acronym
4. Site 30: Please give an update on the status of the RASO investigations for Site 30.

### Schedule:

1. Reflects Site 11, 12 and Site 30 excavations as being late. Is this due to Site 12 non-rad. and Site 30 RASO or some other reason? Please revise line 187 to make the date current and removal site 11 (since no further excavations will occur).
2. It is also unclear why NA has been entered into the baseline figures. The site is being evaluated for cap thickness for soil cover and will need an FSA/PP.
3. The Public comment period (Line 199) would appear to be held during the finalization of the Proposed Plan and FSA (based on previous future dates). It will have to wait for the final proposed plan before starting. Please note that the Draft ROD does not have to wait for the public comment period. The incorporation of the public comments (Line 200) typically occurs during revised drafts or draft final phases.
4. Line 209: There is no public comment on the DF ROD.
5. Will there be need to revised the LUC RD to ensure that the LUC include no intrusive activities in the Site 11 area? I also wonder about an RD considering the need for additional work on the cover for Site 11. Drainage protection may be a key component considering the location near the shore. If we can make it protective with just an RAWP I'm game.

### Milestones in 2013 SMP

1. Milestone dates will need to be revised to meet the questions above.

## OU 4

### Exit Strategy:

1. The comments suggest that the year 2 plan was just completed. Seems we should have one plan for all 5 years adjusted appropriately. It is unclear from the schedule what year 2011 is; though it is likely Year 3 (Deduced from year 4 also being on the schedule). The exit strategy says year 4 is 2012. This comment field needs some clarity.

2. The site also suggests LTM program when it should more like be MNA program.

#### Schedule

1. This OU schedule appears to switch back to a fixed baseline un-modified by 2013 submittal. Reviewed the future actual dates for next milestones.

#### SMP Milestones:

1. Year 4 would appear to be schedule for May 2013. However, there is a one year difference between the baseline date and the actual date. This makes unclear which report is being submitted in 2013 (Year 4 or Year 5). If year 4, then it would appear we're behind schedule. Please clarify the three documents (Exit Strategy, Schedule and SMP).
2. EPA is still awaiting the Navy submittal of an Interim RACR. Please add this to the SMP.

#### OU 11

#### Exit Strategy

1. There would appear to be some confusion in the dates in the additional comment field. Was the RD sent to the regulators in Nov 2010? If so, please correct the typo.

#### Schedule

1. The Navy recently submitted a GW monitoring plan for OU 11. Is this the RAWP when combined with the UFP-SAP?
2. Are the LUC RD and the RD equivalent?
3. The 2011 Monitoring report is not being schedule until 2013. Seems a title change would be appropriate to cover the periods of the sampling.
4. The schedule concludes with a RACR but it is unclear from the Exit Strategy what is included in this RACR. Should it include GW then it would be interim. If for the soils then it should include the Removal action report.

#### SMP Milestones

1. Please update based on the comments above.

## OU 13

### Exit Strategy

1. Please revise LTM nomenclature as the site should be reviewed through MNA parameters.

### Schedule

1. The schedule would appear to no longer include sampling events (NA in baseline sampling). If groundwater concentrations have not reached performance goals then monitoring should continue. The SMP appropriately includes additional sampling as does the future schedule.

### SMP

1. Please include an interim RACR for this site.

## OU 16

### Exit Strategy

1. No comment

### Schedule

1. Please begin the FS once the Draft RI has been commented on by the regulatory agencies. This will allow full internal deliberation and limit some of the extended schedules. The same should be true for the PP, ROD, and RAWP schedules.

### SMP

1. Once the schedule is revised as per the comments above, the SMP can be updated.
2. The date for submittal of the Draft RI is acceptable.

## OU 18

### Exit Strategy

1. The phase for OU18 for this OU should read RA.
2. Remedy is MNA for groundwater not LTM. Additional comments a bit dated, as well.

Schedule:

1. The RACR should be an interim report because of the GW concentrations remaining above cleanup goals.

SMP:

1. No Comment

OU 19

Exit Strategy:

1. No Comment

Schedule:

1. The draft PP should be submitted with the DF FS, and draft ROD with the DF PP. The same may provide efficiencies for the RD and RAWP.
2. There is also a need for a RACR (interim) for this site.

SMP:

1. The Proposed Plan will likely be a 2013 milestone if submitted with the DF FS.
2. Other dates can be adjusted accordingly.

OU20 and OU 21

Exit Strategy:

1. Should be updated to reflect EPA's request to integrate these OUs into OU11.

Schedule:

1. Please integrate a line item for a technical memorandum that updates the groundwater concentrations and path forward for this site.
2. It is likely a revised draft of the proposed plan will be required should these OU's continue.
3. Schedule efficiencies could be achieved by submitting draft final PP and Draft RODs at similar time frames. Other efficiencies post-ROD should also be considered.

SMP:

1. Decision needed on OUs prior to review.

PSC 47

Exit Strategy:

1. Should be added to the IR Sites table.

Schedule

1. Needs to be added.

SMP:

1. Please explain why characterization wouldn't start in 2013.

MMRP

Exit Strategy:

1. It would appear that there is more definition to the MMRP sites than presented in the exit strategy. It might be possible to separate the MMRP site that are likely to go into an RI/FS from those that would not. Those with an RI might be listed separately.

Schedule:

1. Please submit the Draft PP with the Draft Final FS. The same should happen in subsequent phases like ROD and RAWP
2. Please add the subsequent phases for the project (RD and RA).

SMP:

1. RI date in the schedule does not reflect the date in the SMP
2. The same is true for the FS, Proposed Plan, ROD
3. RD or RA should have proposed dates as appropriate.