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NAS PENSACOLA
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LETTER REGARDING APPROVAL OF REQUEST FOR EXTENTION TO SUBMIT DRAFT
REMEDIAL ACTION COMPLETION REPORT OPERABLE UNIT 18 (OU18) SITE 43 NAS
PENSACOLA FL
12/20/2012
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
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RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

December 20, 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 Completion Report, Operable Unit 18,
Site 43, Naval Air Station Pensacola, Pensacola

Dear Patty:

The Department has received the Navy's request for a 137-day extension from December 31, 2012 to May 17, 2013 to submit the Draft Remedial Action Completion Report, Operable Unit 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 by e-mail on December 19, 2012. The Department and EPA have granted previous extensions for the Draft Remedial Action Work Plan and the Draft Remedial Action Completion Report this calendar year. The current reason for requesting an extension identifies a greater-than-expected density of anomalies detected in the top 2 feet of soils within an area to be excavated and more time to allow for approval of the Final Explosives Safety Submission by DDESB. While the Department is increasingly frustrated with delays in the completion of remedial actions at Operable Unit 18, Site 43, the Department reluctantly concurs with the requested extension pursuant to Section XXIV of the NAS Pensacola Federal Facilities Agreement. 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

Patty Marajh-Whittemore
Extension Request for Draft RACR
Operable Unit 18, Site 43
Naval Air Station Pensacola
Page 2 of 2
December 20, 2012

KAW

A handwritten signature in blue ink, appearing to be 'Patty Marajh-Whittemore', written over the printed name 'KAW'.



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

Memorandum for the file

Date: December 19, 2012

Subject: Extension of Calendar Year 2012 NAS Pensacola Site Management Plan (SMP)
Deadlines, Extension Number 2012-027

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.

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 Completion Report (RACR).
3. **Length of extension/new deadline:** The 137-day extension for submittal of the Draft RACR from December 31, 2012 to May 17, 2013.
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 Completion Report (RACR) for OU18, Site 43 in a Memo to File dated July 24, 2012 indicating a submittal date of December 31, 2012. This extension was requested with the expectation that the pre-excavation confirmation sampling would be completed during October 2012 and the Final Explosives Safety Submission for Site 43 would be approved by Naval Ordnance Safety and Security Activity (NOSSA) and the Department of Defense Explosives Safety Board (DDESB) to facilitate excavation of soils during November and December 2012. In the meantime, comments from NOSSA on the Draft ESS required additional coordination by the Navy's remedial action contractor to acquire information on the status of all occupied and unoccupied buildings within the explosive safety quantity distance (ESQD) arcs of a potential munitions and explosives of concern (MEC) or materials presenting a potential explosive hazard (MPPEH) identified for Site 43. Review of the Final ESS by DDESB is currently ongoing and expected to be complete by early February 2013. Additionally, the Navy's remedial action contractor has discovered a significant density of anomalies within the top 2 feet of soils within the excavation areas that will require additional discussion from the NAS Pensacola Partnering Team before implementation of the pre-excavation confirmation sampling procedures currently prescribed in the Uniform Federal Code Sampling and Analysis Plan (UFP-SAP) for Site 43. The greater-than-expected density of anomalies is also likely to increase the time required to complete soil excavation at the site. In order to allow sufficient time for DDESB review and approval of the Final ESS, facilitation of a discussion of the confirmation sampling procedure by the NAS Pensacola Partnering Team, commencement and completion of excavation activities followed by preparation and submittal of the Draft RACR, an extension for the Draft RACR submittal date to May 17, 2013 is being requested.

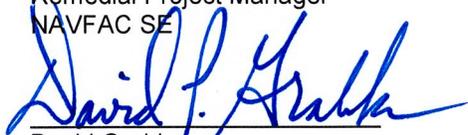
IT IS SO AGREED

MARAJH-
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ou=USN, cn=MARAJH-
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Patty Marajh – Whittemore
Remedial Project Manager
NAVFAC SE

Date



12/20/12
Date

Timely

Good Cause

David Grabka
Remedial Project Manager
Florida Department of Environmental Protection

Timely

Good Cause

Tim Woolheater
Remedial Project Manager
USEPA, Region 4

Date