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NAS PENSACOLA  
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RESPONSE TO COMMENTS FROM THE U S EPA REGION IV ON THE DRAFT FEDERAL  
FACILITIES AGREEMENT SITE MANAGEMENT PLAN CALENDAR YEAR 2012 NAS  
PENSACOLA FL  
10/14/2011  
NAVFAC SOUTHERN

**Response to Comments**  
**Comments from the U. S. Environmental Protection Agency on the Draft Federal**  
**Facilities Agreement (FFA) Site Management Plan (SMP),**  
**Calendar Year 2012**  
**Naval Air Station Pensacola,**  
**Pensacola, Florida**  
**Comments dated September 16, 2011.**

**General Comments**

1. Pg 1-2: Please provide a summary of all operational ranges along with the "other than operational" ranges referred to in Section 1.2. By policy, operational ranges are typically deferred unless a release "off-range" is of issue. The determination of whether and off-range release has occurred should be discussed.

**Response:** Currently the only operational range in the Pensacola Naval Complex is the pistol range at Sherman Field. There is no official name for the range but it is typically called the pistol range. The only rifles allowed to be fired at the range are shot guns. The range is not certified for any other rifles. The range is utilized to certify military personnel in the use of pistols. The pistols are fired into targets which are placed in front of a large berm which captures the bullets. Therefore, there are no off-range issues and no off-range releases have occurred at this operational range. This text will be added to the SMP.

2. Pg 2-1, last paragraph: Please clarify the statement that a "Post-Closure Permit was completed..." It would appear to suggest that the Permit was closed; however, the context suggests that it was issued in September 2008.

**Response:** A Post-Closure permit is still active for the wastewater treatment plant. The FDEP Permit/Certification Number is 015498-005-HF and the permit was renewed on September 12, 2008 and expires September 20, 2016.

The SMP wording looks to be accurate as other PSCs were identified in the original HSWA permit and are included in an Appendix to current permit.

3. Page 2-2, first paragraph: The background information is a bit unclear. Please provide an appendix with a summary of all of the PCS site and their current status. The status does not have to be as detailed as Table 1; however, should provide a list of each PSC, its OU if necessary, site description, regulatory status and reference document for the last decision. This will then allow a crosswalk between overall status and the remaining work as described in Table 1.

**Response:** The indicated document text will be revised for clarity, Table 1 will be edited for a more concise site description and history and an additional table

will be added to provide the site regulatory status and current decision documents.

4. Pg 2-2, first paragraph: Twenty-five PSCs have been classified as requiring RI/FS's and 21 classified as PSCs requiring screening. Please clarify that the 22 PSC sites with RODs are in the subset of sites requiring an RI/FS. Please clarify the rationale for removing PSC 6. There are also 22 NFA sites (10 with RODs and 12 others). This would suggest that 15 sites remain in the 2 category of requiring an RI/FS and another 9 screening sites. However, 10 sites have been transferred to UST and RCRA. Please explain and document site status by PSC in a table as requested above. It may also be beneficial to separate the two categories of sites (RI/FS and screening) into two paragraphs.

**Response:** The reviewer is correct in that the 22 PSC sites with RODs are in the subset of sites requiring an RI/FS. This statement will be incorporated into the document.

Screening PSC 6 was removed from the screening process because it is an active construction debris landfill exempt from solid waste landfill regulations (correspondence dated August 8, 1997). This statement will be incorporated into the document.

An additional table (Table 2) will be incorporated into the SMP to describe screening verses RI/FS sites, provide the current regulatory status of each of the PSC site and current decision documents.

5. Pg 2-3, 1st partial paragraph: Please clarify what is meant by "The seven remaining PSCs..."

**Response:** The text has been modified as follows: "Seven PSCs (including PSCs 3, 19, 20, 21, 22, 23, and 37) will not proceed in the IRP process. These seven PSCs were transferred to the Petroleum Program and the proposed schedule of deliverables is included in Florida Petroleum Contamination Agreement Annual Site Management Plan Amendment. The FDEP has a regulated process administered through promulgated rules for the assessment and remediation of petroleum related constituent contaminated sites."

6. Pg 2-3, paragraphs 2 and 3: Please clarify the status of the decision to address OU10 groundwater under RCRA. As written, these paragraphs would suggest a decision has yet to be made regarding the transfer to RCRA.

**Response:** The transfer was previously completed and the text has been edited as follows: "OU 10 met the criteria established in 62 CFR Part 62523 to defer the site to the RCRA program. The transfer to RCRA, as concurred by FDEP and USEPA, ensured that the remedy remains protective of human health and the

environment, complies with federal and state requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action at the time the original ROD was signed.”

7. Table 1 (T1) General: For clarity, please provide one additional column to the table that delineates the primary and secondary documents that are scheduled in Table A-1.

**Response:** Table 1 will be extensively revised for clarity and conciseness. An additional table (Table 2) will be added to cross reference the PSC regulatory status and current decision documents. However the purpose of the placement of the document schedule in Appendix A was so that the Site Management Plan could be readily updated annually without extensive cross checking and referencing. Incorporating the primary and secondary documents for a given year into a table within the body of the document defeats this purpose and is not recommended.

8. T1 review including cross-walk with Table A1
  - a) OU1: Table A1 does not include the schedule for the ESD mentioned in the write-up.

**Response:** The Navy originally anticipated submittal of the Draft OU 1 ESD as a Draft Primary document in November 2011 which is within the 2011 calendar year, and therefore, it was not included in the NAS Pensacola Site Management Plan for Calendar Year 2012. However the Navy now projects document submittal within calendar year 2012 and the document will be added to the SMP.

- b) OU2: There is no provision for an ESD in A1. Would there also be an LTM/LUC WP?

**Response:** The Navy originally anticipated submittal of the OU 2 ESD during the 2011 calendar year and therefore it was not included in the NAS Pensacola Site Management Plan for Calendar Year 2012. However the Navy now projects document submittal within calendar year 2012 and the document will be added to the SMP.

The LTM work plan was completed in the form of a UFP SAP which was submitted by CH2M Hill and approved by the regulatory agencies on August 5, 2011.

Specifications for the implementation of the OU 2 Land Use Controls are provided in the previously submitted Final Remedial Design for Operable Unit 2 Naval Air Station Pensacola, Pensacola, Florida. (March 2010) Appendix A; the Land Use Control Remedial Design.

- c) OU3: Please explain how the NFA ROD compares with the statement, "unless restrictions ... are substantially changed."

**Response:** As specified in the Site 2 (OU 3) ROD: "The selected remedy is No Action. None of the CERCLA Section 121 statutory determinations are necessary in this section since no remedial action is selected. No CERCLA action is necessary for the protection of human health and the environment at the site. "

- d) OU4: The text mentions an Interim ROD and 5YR. Please indicate when the final ROD will be issued and explain the rationale why the 5YR did not lower the arsenic standard to 10ug/L as would be expected.

**Response:** In Table 1 the OU 4 discussion references an Interim Remedial Action Report and a final ROD. The final ROD was issued September 27, 2000.

The 5-year review specifies (Page 3-8) "It should be noted that the wells exceeding the remedial goal for arsenic in the baseline survey also exceeded the remedial goal for arsenic during each semi-annual monitoring event. In addition, although the ROD specified a remedial goal of 50 µg/L, the USEPA Region IV preliminary remediation goal and FDEP's GCTL for arsenic is 10 µg/L (CH2MHill, 2003)." However the document later specifies:

- **"Changes to Standards and To Be Considered:** Changes to standards FAC Chapter 62-3, 62 550 and 62-777 were identified during performance of this five-year review. However, the changes are not believed to affect the protectiveness of the remedy for this site."

- e) OU6: Please explain why the disposal yard does not have LUCs. Also explain the results of any investigations regarding the "black slimy liquid."

**Response:** The OU 6 site area is located in the area of the former Base Realignment and Closure (BRAC) activities of Chevalier Field. The area was subject to extensive demolition and construction following the 1994 field investigation. Prior to BRAC construction, contaminated soil identified in the field investigation was removed as an interim removal action. The final RI report indicated that further delineation and assessment within the OU 6 area is unwarranted and recommended no further action.

Following the reported exposure to "black slimy liquid" in 1981, a phased remedial investigation was completed between 1994 and 1997. The area of the "black slimy liquid" exposure was investigated during Phase I by the installation of 2 soil borings, 10 soil boring converted to temporary monitoring wells and a permanent monitoring well. Phase II of the investigation refined the data collection by conducting 4 additional soil borings and converting an additional soil boring to a temporary monitoring well. The presence of the liquid was not verified and a risk assessment did not identify unacceptable risks.

- f) OU11: Should include RA work plan schedule (if necessary) in Table A-1 and an indicator of RA completion report.

**Response:** For OU 11 Site 38 the remedial action work plan was completed as a UFP SAP which was submitted as a draft document to the regulatory agencies on May 17, 2010. FDEP commented on the document on August 18, 2010 and USEPA approved the document without comment on November 1, 2010. A Remedial Action Completion Report is not planned, however, Annual Groundwater Sampling Reports will be submitted to the regulatory agencies for review.

- g) OU12: Please indicate the rationale for not lowering the MCL and indicate the documentation approving the shallow aquifer as non-potable by the FDEP.

**Response:** For OU 12, Site 39 the original ROD completed in July 1995 specified the selected remedy of No Further Action with a Five-year review within 5 years. However in March 1998 an ESD was approved which specified a significant difference to the ROD involved deleting the Five-year Review. Therefore the site was not included in the 2003 or 2008 NAS Pensacola 5-Year Review.

Although the shallow aquifer is discussed in the ESD as non-potable based on saltwater intrusion, documentation approving the shallow aquifer as non-potable by the FDEP has not been verified, therefore the statement will be removed.

- h) OU13: Should have a secondary monitoring report in App A.

**Response:** Agreed a Secondary Document the Draft Annual Groundwater Monitoring Report will be submitted in December 2012. The document will be added to Table A-1 in Appendix A.

- i) OU14: The EP Toxic standard are not the appropriate test method for determining whether PCBs are an issue at sites. Please explain the rationale for the use of this standard.

**Response:** Reference to the EP Toxic standard was a miss-statement. The reference will be removed from the table.

- j) OU19, 20 and 21: Please add a projected schedule for the RAs for these sites.

**Response:** Agreed the projected scheduled for the Remedial Actions for OUs 19, 20 and 21 will be added.

- k) NFA PSC Sites: Please explain the rationale for adding these sites to this table. They may be more appropriately added to the table proposed in this review. The

table would also need to include the operational ranges as previously commented.

**Response:** The table will be modified for clarity and conciseness. In addition the operational ranges will be added.

- l) 5-Year Review: EPA understands that this document should be completed prior to the date in Table A-1. With that in mind, it may be better to list a Draft report as a milestone 1 year prior to completion of the report.

**Response:** Comment noted, an accelerated submittal date of the 5-year Review document is currently being planned by the Navy.

9. Appendix: Please provide an overall schedule as was done in the 2010 submittal to compliment the milestone schedule.

**Response:** Based on the NAS Pensacola FFA an "overall schedule" (Gantt Chart) is not a Site Management Plan requirement. However, the schedule of Draft Primary Documents as required by the FFA is provided in Appendix A. In addition to facilitate an understanding of the overall progress of the CERCLA process at NAS Pensacola, a Gantt Chart has been prepared and will be reviewed and updated during quarterly NAS Pensacola Partnering Team meetings.