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NAS PENSACOLA
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RESPONSE TO COMMENTS FROM THE FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION 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 Florida Department of Environmental Protection on the Draft
Federal Facilities Agreement (FFA) Site Management Plan (SMP)
Calendar Year 2012
Naval Air Station Pensacola,
Pensacola, Florida
Comments dated September 7, 2011

Comments

1. The title page of the document would indicate the Site Management Plan covers Fiscal Year 2012, but the transmittal page to the document, the text within the document and the Appendices with the program schedule all refer to Calendar Year 2012.

Response: The NAS Pensacola Site Management Plan applies specifically to the Calendar Year 2012. All references to the 2012 Fiscal Year will be changed to calendar year.

2. On page 1-2, Section 1.2, it states that the Preliminary Assessment identified 10 "other than operational" ranges at NAS Pensacola and that in 2010, the Navy initiated Site Inspections at all 10 of the sites. According to our records, Site Inspections were only conducted at 7 of the sites. Those included the Fort Barrancas Rifle Ranges 1 and 2A/2B, the Magazine Point Rifle Range, the Magazine Point Bombing Target, the National Cemetery Gunnery Area South, the Sherman Field Rifle Range, the Fort Redoubt Skeet Range and the National Cemetery Skeet and Trap Ranges. Three ranges listed in Section 2, Table 1, Site Description Chart, as being in the Site Inspection Regulatory Status were not investigated except possibly in the Preliminary Assessment phase. These include the Chevalier Field Machine Gun Range, the Chevalier Field Pistol Range and the National Cemetery Gunnery Range Area North. Please make sure that the Site Management Plan correctly identifies the status of all the ranges.

Response: The Navy concurs with the stated comment. Changes to the text will be made to reflect the current status of all known "other than operational" ranges.

3. On page 2-1, Section 2.2, third sentence, please remove the ")" after "SI".

Response: The indicated correction will be completed.

4. On page 2-6, Table I, in the description of OU I, first paragraph, last sentence, please change "disposed of the PSC 1" to "disposed at PSC 1".

Response: The indicated correction will be completed.

5. On page 2-7, Table I, in the description of OU 2, PSC 11, first paragraph, last sentence, I believe it should say "did not indicate increased toxicity in Wetland 64 leading into Bayou Grande." Also, I am not sure why the fact that toxicity of sediment does not increase as one moves from the source of contamination (Wetland 64) into the larger water body (Bayou Grande) should matter. I would think that it would be expected.

Response: Comment noted. However based on FDEP and USEPA comments Table 1 has been extensively revised. The revised Table 1 will only include a limited site description and history. An additional Table 2 will provide a summary of the individual site regulatory status and current decision documents.

6. In Table I, in the description of OU 2, PSCs 11, 12, 25, 27 and 30, it mentions that "Inorganics detected in excess of NAS Pensacola background Reference Concentrations included ..." It does not identify the medium, whether soil or groundwater.

Response: The indicated text refers to exceedances of NAS Pensacola groundwater Background Reference Concentrations. However based on FDEP and USEPA comments Table 1 has been extensively revised. The revised Table 1 will only include a limited site description and history. An additional Table 2 will provide a summary of the individual site regulatory status and current decision documents.

7. In the description of OU 2, PSCs 11, 12, 25 and 30, in Table 1, a summary of groundwater contaminants that were detected seems to be missing. Also, there does not seem to be any mention of a groundwater monitoring plan or remedy for groundwater associated with those PSCs.

Response: Comment noted. However based on FDEP and USEPA comments Table 1 has been extensively revised. The revised Table 1 will only include a limited site description and history. An additional Table 2 will provide a summary of the individual site regulatory status and current decision documents.

8. Some of the site descriptions in Table 1 need clarification or fixing. I will give two examples. For OU 6, PSC 29, it says workers received skin burns from a "black slimy liquid" in the soil. It goes on to say that the types of chemicals involved and extent of contamination are unknown but that the site received a NFA ROD in 1999. Secondly, for PSC 34, it discusses contamination of soils and groundwater that may have occurred because of a solvent detergent release, that may have penetrated beneath the apron via the expansion joints. It goes on to discuss how "these PSCs" were grouped together and prioritized but does not identify which PSCs are being discussed. The PSC 34 site description indicates the site is contaminated but the regulatory status has it as receiving NFA in 2000.

Response: Comment noted. However based on FDEP and USEPA comments Table 1 has been extensively revised. The revised Table 1 will only include a limited site description and history. An additional Table 2 will provide a summary of the individual site regulatory status and current decision documents.

9. The References given for the Site Management Plan do not seem to mesh with the report. Two Remedial Investigation Reports, two Records of Decision, a Groundwater Monitoring Plan and an Initial Assessment Study are referenced.

Response: The reference list will be revised and updated to accurately reflect the references for the document.

10. In Appendix A, Table A-1, I have the following comments:

- a. For OU 1, Site 1, the first Draft 2014 Annual Monitoring Report should be the Draft 2013 Annual Monitoring Report.

Response: Agreed the change will be made.

- b. For OU 11, Site 38, it has no primary or secondary documents being received in calendar year 2012.

Response: Correct, a Primary Document the Draft Remedial Design was submitted November 30, 2010 and the Secondary Document the Draft UFP SAP for Groundwater monitoring was submitted May 17, 2010. Based on the NAS Pensacola Partnering Team Gantt schedule next draft document will be the Annual Groundwater Monitoring Report in May 2013.

- c. OU 13, Sites 8 and 24 is not listed in Table A-1 and is mistakenly put in Table A-2.

Response: Agreed the site will be moved to the correct table.

- d. For Base wide, please add LUC Inspection Reports.

Response: Agreed the change will be made.