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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT FEDERAL FACILITIES AGREEMENT SITE MANAGEMENT PLAN
CALENDAR YEAR 2013 FOR NAS PENSACOLA FL
11/06/2012
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

November 6, 2012

Ms. Patty Marajh-Whittemore
Naval Facilities Engineering Command Southeast
IPT, Gulf Coast
Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Federal Facilities Agreement Site Management Plan, Calendar Year 2013 for Naval Air Station Pensacola, Pensacola, Florida.

Dear Patty:

The Department has reviewed the Draft Federal Facilities Agreement Site Management Plan, Calendar Year 2013 for Naval Air Station Pensacola, dated August 2013 (received August 30, 2012), prepared and submitted by Naval Facilities Engineering Command Southeast. I have the following comments on the document:

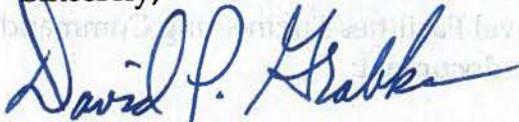
- (1) On page 2-2, second paragraph, fifth sentence, please change PCS 41 to PSC 41.
- (2) On page 2-4, first paragraph, second sentence, please revise this sentence as it is poorly constructed.
- (3) In Table 1, Site Description Chart, PSC 8 should be identified as Site 8 and should also be identified as part of OU 13. PSC 24 should be identified as the other part of OU 13.
- (4) In Table 1, Site Description Chart, PSC 34, it discusses where contamination may have occurred or was suspected to have been carried. However, it does not discuss whether these were ever investigated or remediated, something that would normally be required for the site to have attained No Further Action status in 2000.
- (5) The References given for the Site Management Plan include only the NEESA Initial Assessment Study, the Geraghty and Miller Verification Study and the

Tetra Tech Record of Decision for OU 13. This list seems unnecessarily limited. The references should probably include at least the Federal Facilities Agreement the Confirmation Study report, and the RCRA Facility Assessment report.

- (6) In Section 2.2, last paragraph, it says that the next Community Involvement Plan update is planned for 2014. This is not reflected in the Installation Restoration Program Schedule for Basewide documents in Appendix A.
- (7) In Table A-1, for OU 19, Site 44, it has the Draft ROD being issued November 2012 in the CY2014 column. This date has the Draft ROD being issued before the Draft FS Addendum or Draft Proposed Plan.
- (8) In Table A-1, for the MMRP Sites, it has the Draft ROD being issued over two years after the Draft Proposed Plan. The Draft ROD should be issued shortly after the Proposed Plan has been accepted by the regulatory agencies and the public.

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

CC: Tim Woolheater, EPA Region 4, Atlanta
Gerald Walker, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola
Sam Naik, CH2M Hill, Atlanta

KAW