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LETTER REGARDING NAVY RESPONSE TO FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION COMMENTS ON DRAFT FINAL CALENDAR YEAR 2015
SITE MANAGEMENT PLAN NAS PENSACOLA FL
11/18/2014
NAVFAC SOUTHERN



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST
JACKSONVILLE, FL 32212-0030

5090
Ser OPUE3/480
November 18, 2014

Florida Department of Environmental Protection
Waste Cleanup Program
Attn: Mr. David Grabka, P.G.
Bob Martinez Center, MS 4535
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Grabka:

SUBJECT: DRAFT FINAL CY 2015 SITE MANAGEMENT PLAN AT NAVAL AIR STATION
PENSACOLA, FLORIDA

In reference to the CLEAN Contract No. N62470-11-D-8013, Contract Task Order No. JM40, enclosed are the Responses to Comments and Draft Final CY 2015 Site Management Plan for the Naval Air Station Pensacola, FL.

Should you require any further details or clarifications, please contact Ms. Patty Marajh-Whittemore, Remedial Project Manager, at (904) 542-6202 or email: patty.whittemore@navy.mil.

Sincerely,

For C. R. DESTARNEY, PE
Environmental Business Line
Coordinator
By direction of the
Commanding Officer

Enclosure: Draft Final CY 2015 Site Management Plan at Naval Air Station
Pensacola, FL

Copy to:

Ms. Patty Marajh-Whittemore, NAVFAC SE
Mr. Tim Woolheater, EPA
Mr. Greg Campbell, NASP PWC
Mr. Gerry Walker, Tetra Tech
Mr. Sam Naik, CH2M Hill
Ms. Allison Harris, Resolution Consultants

**Florida Department of Environmental Protection
Technical Comments on the
Draft Federal Facilities Agreement
Site Management Plan, Calendar Year 2015
Naval Air Station Pensacola, Pensacola, Florida
Received November 13, 2014**

Comment 1:

On page 2-3, second paragraph, third sentence, please replace "petroleum related constituent contaminated sites" with "sites contaminated with petroleum or petroleum products".

Response:

Agreed. Petroleum related constituent contaminated sites" has been replaced with "sites contaminated with petroleum or petroleum products".

Comment 2:

On page 2-3, fifth paragraph, fourth sentence, please remove the "and" from "and or".

Response:

Agreed. "And" have been removed from "and or".

Comment 3:

On pages 2-3 and 2-4, last sentence at the bottom of page 2-3 extending to page 2-4, please revise the sentence to read correctly.

Response:

Agreed. The sentence has been revised.

Comment 4:

On page 2-5, Section 2.4, first paragraph, first sentence, a report (ESI) is identified as a site. Please correct.

Response:

Agreed. The sentence has been revised from ESI to PSC.

Comment 5:

On page 2.5, Section 2.4, third paragraph, first sentence, it says that the operation of the groundwater interception trench was decommissioned because the system was not effective in reducing iron concentrations in the wetland. Please revise the sentence to more accurately state that groundwater extraction from the groundwater interception trench was discontinued because the system was not attaining groundwater or surface water remedial action objectives.

Response:

The sentence has been revised to state "trench was discontinued in May 2010 because the system was not attaining groundwater or surface water remedial action objectives. "

Comment 6:

The Draft SMP uses the terms Potential Sources of Contamination (PSCs) and Sites to designate the same sites in different parts of the document. Please explain how PSCs are related to Sites or if they are equivalent. In Sections 2.0 through 2.3, the term PSCs is mostly used. In Section 2.4, the term Sites is prevalent.

Response:

Agreed. The term Potential Sources of Contamination (PSCs) is used when the site conditions are not known. PSCs will either be no further action or become a site or operable unit based on the investigation findings.

Comment 7:

On page 2-7, second paragraph, last sentence, the word "proposed" is misspelled.

Response:

The spelling on "proposed" has been corrected.

Comment 8:

On page 2-8, in the discussion of OU 11, the paragraph ends with the word I-RACR by itself. Please either complete a sentence with the word or remove it.

Response:

Agreed. The sentence has been revised to state "The OU 11 I-RACR schedule will be dependent on whether the groundwater for OUs 20 and 21 will be integrated into OU 11."

Comment 9:

In Table A-1, there are no primary or secondary documents scheduled for OU 18, Site 43. I believe this is in error.

Response:

Table A-1 has been updated based on the Gantt Chart updated during the November 18 and 19, 2014, Team Meeting.

Comment 10:

In Table A-1, there are no secondary documents scheduled for OU 19, Site 44; OU 20, Site 45; and OU 21, Site 46. I believe this is in error. All three sites are expected to undergo continuing groundwater monitoring and there are sampling programs for all three sites that have been approved or are in the process of finalization.

Response:

Table A-1 has been updated based on the Gantt Chart updated during the November 18 and 19, 2014, Team Meeting.