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NAS PENSACOLA
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LETTER REGARDING REVIEW AND COMMENTS ON FEDERAL FACILITY AGREEMENT
SITE MANAGEMENT PLAN FOR 2012 NAS PENSACOLA FL
9/16/2011
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

September 16, 2011

Official Correspondence – This electronic message is being sent in lieu of regular mail

4SF/FFB

Ms. Patty M. Whittemore
Remedial Project Manager
SOUTHNAVFACENCOM
NAS Jacksonville Building 103
Jacksonville, FL 32212

Re: EPA Review of the Federal Facility Agreement Site Management Plan, FY 12

Dear Ms. Whittemore:

The United States Environmental Protection Agency has received and reviewed the above referenced document. The EPA comments on the Pensacola SMP are provided below:

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.
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.
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.
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

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.

5. Pg 2-3, 1st partial paragraph: Please clarify what is meant by “The seven remaining PSCs...”
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.
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.
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
 - b. OU2: There is no provision of an ESD in A1. Would there also be an LTM/LUC WP?
 - c. OU3: Please explain how the NFA ROD compares with the statement, “unless restrictions ... are substantially changed.”
 - d. OU4: The test 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.
 - e. OU6: Please explain why the disposal yard does not have LUCs. Also explain the results of any investigations regarding the “black slimy liquid.”
 - f. OU11: Should include RA work plan schedule (if necessary) in Tble A-1 and an indicator of RA completion report.
 - 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.
 - h. OU13: Should have a secondary monitoring report in App 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.
 - j. OU19, 20 and 21: Please add a projected schedule for the RAs for these sites.
 - 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.
 - 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.
9. Appendix: Please provide an overall schedule as was done in the 2010 submittal to compliment the milestone schedule.

Should any of the above comments require clarification, please contact me at 404-562-8510 or woolheater.tim@epa.gov.

Sincerely,

Timothy R. Woolheater
Senior Remedial Project Manager
Federal Facilities Branch

CC: Mr. David Grabka, FDEP