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CERTIFIED MAIL- RETURN RECEIPT REQUESTED

DEC 18 1992

Ms. Allison Drew
United States Environmental Protection Agency (EPA)
Region IV
Waste Management Division
RCRA and Federal Facilities Branch
345 Courtland Street, NE
Atlanta, Georgia 30365

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NAS PENSACOLA
5090.3a

Dear **Ms. Drew**:

Responses to EPA's letter dated 8 DEC 1992 (received 14 DEC 1992), and FDER's letter dated 7 DEC 1992 (received 11 DEC 1992), on the 1993 Site Management Plan (SMP) for the Naval Air Station (NAS) Pensacola, Pensacola, Florida are submitted as enclosure (1).

EPA's letter stated, if the Navy did not have responses back by 17 DEC 1992 the matter shall be immediately elevated to dispute resolution. The Navy believes dispute resolution should be invoked over substantial unresolvable issues and not arbitrary dates. To do otherwise would not meet the parties' FFA obligation to resolve disputes at as informal level as possible.

If you should have any questions regarding the enclosures, please contact Ms. Linda A. Martin at (803) 743-0574.

Sincerely,

JAMES B. MALONE, JR., P.E.
BRANCH HEAD, INSTALLATION
RESTORATION, SECTION 1

(1) Navy Responses to EPA's and FDER's Comments

copy to:
NAS Pensacola (Mr. Ron Joyner, Code 18520)
FDER (Mr. Eric Nuzie) w/encl
Ensafe (Mr. Henry Beiro) w/encl

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THE NAVY'S RESPONSES TO EPA' AND FDER'S REVIEW COMMENTS ON
REVISED FY 93 SITE MANAGEMENT PLAN (SMP)
FOR NAVAL AIR STATION PENSACOLA, PENSACOLA, FL

1. Comment: #1 EPA and #1 FDER

Regarding the status of PSC's 12, 13, 14, and 24, the approved final Phase II Workplans are in error. These workplans were changed by the contractor, without discussions with the Navy, from a statement in EPA's cover letter to comments directing they be changed. These sites for the SMP will remain screening sites as listed in the FFA until there is defensible data to decide otherwise.

As I explained in our last responses to comments:

1. The Navy will take all samples at level 3 or level 4 DQL.
2. Since these sites have cost plus contracts all contracts have been or will be negotiated as if all sites are RI/FS sites.
3. For all FFA screeningsites, when the Navy receives validated data the site will either have a site assessment report written with a no further action required or will immediately proceed to the RI/FS status.

By doing the above, the proper action for these sites can be determined for the least funds and time.

2. Comment #2 EPA and #2 FDER

The Phase I investigations did show contaminates exist at the site. It does not show if the contaminates are from the existing RI/FS site the line crosses or from the sewer line.

After discussing Site 36 Industrial Sewer Line with EPA and FDER, we proposed delaying Site 36 from the approval of the SMP, until after a meeting on 21 and 22 Jan. 1993. This proposal is due to the complexity of Site 36.

If the delay is not granted, the Navy's position is the same response as Navy's Comment 1.

3. Comment: #3 EPA

The only risk assessment as a separate document the Navy is preparing for all bases is the baseline risk assessment. In accordance with Section VIII.D of the FFA, they will remain secondary documents.

4. Comment #3 FDER (Approximate date of schedule for Site 39 Oak Grove Campground Immediate Removal Action)

If it is determined an IRA is needed at all, you will receive a schedule in June 1993. In the first part of November tests (SOV's and ground water) were taken for VOC's. Nothing was found. Because of this information and 1990 testing it appears there is no immediate health risk. Since sampling for Category II Phase II work will start in the March-April timeframe, the Navy will wait for this data to make a decision on the IRA.

5. Comment: Lateness of Navy's SMP resubmittal

The Navy's SMP resubmittal was not late. The FFA Section XXIII.D states the Navy has 30 days from receipt of all comments to resubmit. Although your letter were addressed 6 OCT(EPA's) and 9 OCT(FDER's), they were received in this office 12 OCT and 15 OCT. The SMP was resubmitted on 13 NOV.