



UNITED STATES ENVIRONMENTAL PROTECTIO  
REGION IV

345 COURTLAND STREET. N.E.  
ATLANTA. GEORGIA 30365

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NAS PENSACOLA  
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OCT 28 1993

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REOUESTED

Commanding Officer  
Attn: Ms. Linda Martin - Code 1851  
SOUTHNAVFACENGCOM  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Re: Draft FY 94 Site Management Plan (SMP)  
Naval Air Station (NAS) Pensacola, Florida

Dear Ms. Martin:

The Environmental Protection Agency (EPA) has completed its review of the draft FY94 Site Management Plan (SMP) for the Naval Air Station (NAS) Pensacola, Florida which was received in this office on September 9, 1993. Our comments are presented on the following pages. As per Section XXIII.D. of the FFA, a draft final SMP which incorporates our comments must be submitted within 30 days of your receipt of this letter.

Please contact me at 404/347-3016 should you have any questions regarding the enclosed comments.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Allison W. Drew".

Allison W. Drew  
Remedial Project Manager  
Department of Defense Remedial Section  
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS, Pensacola  
Eric Nuzie, FDER

REVIEW AND COMMENT  
FY94 SITE MANAGEMENT PLAN  
NAVAL AIR STATION (NAS) PENSACOLA  
PENSACOLA, FLORIDA

GENERAL COMMENTS:

1. In order to keep the Parties informed of, and allow them to anticipate, other activities and investigations occurring at NASP which may impact the IRP investigative schedules, priorities and goals, please include the following as attachments or appendices to the SMP:

- A. A list of sites being investigated under the UST Program
- B. A map illustrating the locations of currently-planned construction associated with the BRAC realignment

2. In the interests of streamlining the remedy selection process, EPA proposes the following change to all enforceable schedules for the Parties consideration:

- A. Prepare and submit the Draft Record of Decision concurrently with the Draft Final Proposed Plan
- B. Extend the total, combined period of review for these two documents to 90 days. Complete review of the Draft Final Proposed Plan in the first 30 days of this period and take the entire 90 days to complete review of the Draft Record of Decision.

This should improve the efficiency of the review process by allowing the Parties to prepare and review two very similar documents simultaneously, thereby reducing the number of separate submittal and review deadlines to be maintained. Also, since the net effect would be to shorten the total time between submittal of the Draft RI/BRA and ROD finalization, this change would allow the Parties to lengthen the "stagger" time between categories (i.e. submit the Draft RI Report at a later date for later categories) without any slippage in the current ROD finalization dates.

SPECIFIC COMMENTS:

1. Page 2, Paragraph 2:

A. "The seventeen (17) PSCs undergoing screening will not be included or tracked in the SMP, unless they have been categorized with Operable Units for investigative and reporting purposes." Therefore, please include a brief (i.e. one paragraph) description of each screening site which has been assigned to a category containing an Operable Unit, or RI/FS site. Specifically, please include descriptions of the following screening sites for the following categories:

Category 5: site 14

Category 7: sites 7, 16

B. "...Once available, the Navy will utilize such data to either prepare individual PSC assessment reports to support a No Further Remedial Action Planned (NFRAP) determination with USEPA/FDER concurrence or immediately reclassify the site to RI/FS status." Based on the contamination detected at site 35 (miscellaneous IWTP SWMUs) and the Navy's decision to submit the investigative results for this site as a part of the RI Report for OU 10, rather than as an individual PSC assessment report, please update the SMP to reclassify site 35 to RI/FS status.

2. Page 8, Paragraph 1:

The second sentence of this paragraph is a fragment. Please revise as needed. In general, please check all SMP text for grammatical and spelling errors and revise as needed.

3. Page 9, Section 4.:

Please revise the text to clarify what is meant by the final sentence of this section.

4. Page 13:

A. Please include any actual duration dates for OU 10 which were not known at the time of Draft SMP submittal in the Draft Final SMP.

B. As per our telephone conversation of October 25, 1993, and in the interests of expediting the RI/FS for OU 10 to the extent practicable, the Parties agree that the following changes shall be made to the schedule for Category 1 - OU 10:

1. The forthcoming revision of the RI Report for OU 10 may be considered draft final provided that (i) the agency review period is extended to 60 days, as shown in the Draft FY94 SMP, in order to allow time for a complete technical review, and (ii) the Navy agrees to request, in writing, an extension for submittal of the final RI Report if any Party has a significant number of substantial comments (i.e. comments which cannot reasonably or acceptably be addressed within a week of receipt).

2. EPA shall complete its review of the Draft FS Report for OU 10 and transmit draft comments to the Navy within 30 days of our receipt of the Draft Final RI Report for OU 10. EPA's final comments on the Draft FS Report shall be transmitted to the Navy no later than 45 days from our receipt of the Draft Final RI Report. The Navy shall revise and resubmit the Draft Final FS Report, to address all Parties comments, by January 12, 1993, as shown in Draft FY94 SMP.

5. Pages 21 through 26:

Please revise the primary and projected deliverable lists for Category 3 to include the Draft Final RI Report and the Final RI Report.