



UNITED STATES ENVIRONMENTAL PROTECTION A

REGION IV

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

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NAS PENSACOLA
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JUN 1 1994

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Attn: Mr. Bill Hill - Code 1851
Southern Division
NAVFACENCOM
P.O. Box 190010
North Charleston, South Carolina 29419-9010

SUBJ: Navy Request to Extend and Revise FY94 SMP Schedules;
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) is in receipt of the Navy's request to modify and extend the schedules contained in the approved FY94 Site Management Plan (SMP). EPA has reviewed the revised FY94 SMP which accompanied this request, and our comments are enclosed. Please submit a revised FY94 SMP which adequately addresses EPA's comments no later than fourteen (14) days from your receipt of this letter. Upon receipt of this revision, EPA shall consider the Navy's request to extend and modify the current enforceable schedules for approval.

Please contact me at (404) 347-3016 if you have any questions regarding the above issues or if I can be of further assistance.

Sincerely yours,

A handwritten signature in cursive script that reads "Allison D. Humphris".

Allison D. Humphris
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS Pensacola
Eric Nuzie, FDEP
Henry Beiro, EnSafe

TECHNICAL REVIEW AND COMMENTS
REVISED FY94 SITE MANAGEMENT PLAN
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

1. Page 3, Paragraph 6:

Please revise the second sentence of this paragraph to clarify that "Categories" are not equivalent to "Operable Units". "Groups", "Batches" and "Categories" were devised by the Navy to facilitate the funding process. An "Operable Unit" is "a discrete action that comprises an incremental step toward comprehensively addressing site problems." (NCP)

2. General Comment:

As discussed in the April 1994 conference call, EPA will require the following category-specific review times in order maintain review schedules for large numbers of documents simultaneously.

<u>Document</u>	<u>Review Period (days)</u>
Draft RI/BRA	100
Draft Final RI	60
Draft FS	90
Draft Final FS	60
Draft Proposed Plan	60
Draft Final PP	45
Draft ROD	60
Draft Final ROD	45

These time periods must be entered into the schedules provided for each category. Also, since Categories 2 and 4 include 3 or more Operable Units, an additional 20 days will be required to review all documents in these categories.

3. General Comment:

As discussed in the April 1994 conference call, the Draft FS Report for all Operable units should be submitted simultaneously with, rather than prior to, the Draft Final RI Report.

4. General Recommendation:

Simplify the format of future SMPs as much as possible. For example, in the detailed schedules provided for each category, add mail times to the time allotted for the preceding event. This will eliminate almost every other line of these schedules. Flag the enforceable due dates in these schedules through use of bold or shaded print, and eliminate the individual deliverables schedules provided after each site description. Such simplification may facilitate preparation, review and finalization of future SMPs.