



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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NAS PENSACOLA
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DEC 10 1994
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Commanding Officer
Attn: Mr. Bill Hill - Code 1851
Southern Division
NAVFACENCOM
P.O. Box 190010
North Charleston, South Carolina 29419-9010

SUBJ: Draft Final FY95 Site Management Plan (SMP);
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) has completed its review of the Draft Final FY95 Site Management Plan (SMP) for the Naval Air Station (NAS) Pensacola, which was received in this office on November 18, 1994. Our comments are enclosed. Per Section XXIII.D. of the Federal Facilities Agreement (FFA), since the Parties have failed to finalize the FY95 SMP by December 1, we are now in dispute on this document. It is therefore imperative that the Parties meet to discuss and finalize the FY95 SMP as soon as possible. EPA recommends that this be a priority issue at the upcoming RPM Meeting scheduled for December 12-14, 1994 in Atlanta.

Please contact me at (404) 347-3016 if you have any questions regarding the enclosed comments.

Sincerely Yours,

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

Enclosure

cc: Ron Joyner, NAS Pensacola
Eric Nuzie, FDEP

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**TECHNICAL REVIEW AND COMMENTS
DRAFT FINAL FY95 SITE MANAGEMENT PLAN
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA**

1. Page 2, Paragraph 2:

Upon further review of the data collected to date for the solvent plume identified in the ground water near building 3380, EPA noted that the detected concentrations of several solvents exceed their respective Maximum Contaminant Levels (MCLs). Due to this ARAR exceedence, a full remedial investigation and, potentially, remedial action, must be performed for this site. The site may either be identified as Site 44, or "appended" to an existing RI site. Please make the appropriate changes throughout the SMP text as needed.

Upon review of the data collected to date for Site 14: Dredge Spoil Fill, it appears that a baseline risk assessment, and some additional sampling, is needed to adequately evaluate whether or not the site presents a threat to human health or the environment. As discussed at the November Partnering Meeting, the site can therefore no longer be considered "screening" and must be upgraded to "RI" status. Please make the appropriate changes throughout the SMP text as needed.

2. Page 5, Paragraph 3:

For clarification, please revise the second sentence of this paragraph to read: "Based on the letter received from the USEPA dated 13 March 1992, only FDEP concurrence to modify the CRP is needed". EPA acknowledges and concurs with the Navy's plans to update the CRP, and looks forward to receiving and reviewing a revised CRP which incorporates the many changes which have occurred since the CRP was last prepared, including programmatic changes, changes in DOD guidance, and changes in the concerns of the Pensacola community.

3. Page 5, Paragraph 4:

For clarification, please specify that OU 2 originally consisted of only PSC 11. Also, PSC 30 was originally OU 5, not OU 3.

4. Page 9, Section 4.0:

Please revise the text to clarify that the final status of each PSC (screening or RI) will be determined prior to report submittal, in order to avoid schedule delays in the submittal of RI Reports and/or the unnecessary preparation of Site Characterization Investigation Reports.

5. General Comment:

As discussed in a recent conference call, Section XXIII. of the FFA states that each year's final "FY" SMP will provide schedule deadlines and work priorities for completing each draft primary document "to be submitted in the following calendar year." Therefore, upon approval of an SMP by the Parties, the deadlines

contained in that *SMP* remain in effect until December 31 of the corresponding calendar year (e.g. the FY93 *SMP* specifies enforceable due dates for calendar year 1993). Hence, any deadline missed in the September - December timeframe will require a formal extension request, regardless of any proposed schedule revision which appears in an annual *SMP* update submitted during that same time frame. For this year only, EPA will accept the Draft Final FY95 *SMP* as the Navy's formal request to extend the enforceable due dates for the following primary documents:

- OU 10: Draft FS Report
- OU 3: Draft RI Report
- OU 15: Draft Final RI Work Plan
- OU 16: Draft Final RI Work Plan
- OU 17: Draft Final RI Work Plan
- OU 6: Draft RI Report
- OU 8: Draft RI Report

In the future, formal extension requests must be submitted.

6. General Comment:

As previously agreed to by the Parties, a final, formal response to comments will be submitted with the draft final primary document. However, in order to comply with the terms of Section VIII.G.5. of the FFA, some form of written response to EPA's and FDEP's comments must be received within sixty days of the close of the comment period. EPA recommends that the Parties discuss, and come to agreement on, the form and the timeframe for this response, at the next Partnering Meeting so that it can be included in the final revision of the FY95 *SMP*.

8. Page 18:

In general, the Draft FS should be submitted either after, or concurrently with, the Draft Final RI, since it is difficult to evaluate the adequacy of the FS until the RI is in near-final form. Please revise the schedule for OU 1, and any other schedules, as needed.

9. Page 35:

Combining all sites northeast of Chevalier Field into a single OU should facilitate the Parties efforts to conduct a more coordinated investigation and remediation of this area. However, EPA is concerned at the scheduling delays which have been incurred by adding the relatively low-priority PSCs 12 and 26 to OU 2. Specifically, the Draft RI Report for this high-priority OU will now be submitted only two months before the Draft RI Report for the low-priority Category 6 sites. This delay could also lead to data-useability problems with some of the earliest-collected data for these sites. Since most of the data for sites 11, 25, 27, 30 and 31 is already available, EPA encourages the Navy to schedule data presentations and propose Interim Remedial Actions and/or Removal Actions as soon as possible for appropriate portions of OU 2.