



DEPARTMENT OF THE NAVY  
SOUTHERNDIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
2155 EAGLE OR.. P. O. BOX 10068  
CHARLESTON, S. C. 29411-0068

32501.000  
03.03.00.0013

... NUMBER OF THIS LETTER.  
REFER TO:

5090/11  
Code 18211  
06 JUN 1991

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Ms. Allison Drew  
Remedial Project Manager  
RCRA & Federal Facilities Branch  
Waste Management Division  
U.S. Environmental Protection Agency  
Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

N00204.AR.000229  
NAS PENSACOLA  
5090.3a.

Dear Ms. Drew:

Enclosures (1) through (3) have been provided for your review. Enclosure (1) identifies our comments addressing your letter of April 1, 1991, which provided comments on the Draft/Final Site Management Plan (SMP) dated February 26, 1991. We have appropriately addressed your comments in enclosure (2), Final SMP dated June 3, 1991 (Revision 4). Expedited schedules for OUs 1-17 (also identified as Batches 1-5) have been provided as enclosure (3) per the agreement made during the May 7, 1991 meeting in Atlanta, Georgia with SOUTHDIV, FDER, Installation, and EPA representatives.

Please contact Ms. Suzanne Sanborn at (803) 743-0574, if you should have any questions.

Sincerely;

MR. J.B. MALONE, JR., P.E.  
MANAGER OF THE INSTALLATION  
RESTORATION, EAST SECTION

Encl:

- (1) SOUTHDIV COMMENTS, dtd 6/3/91
- (2) FINAL SMP, dtd 6/3/91
- (3) EXPEDITED SCHEDULES FOR BATCHES 1-5

copy to:

FDER (Mr. Eric Nuzie)  
NAS Pensacola (Mr. Ron Joyner, Code 18520)

SOUTHDIY COMMENTS  
JUNE 3, 1991  
SITE MANAGEMENT PLAN  
FOR  
NAVAL AIR STATION- PENSACOLA

ADDRESSING:  
EPA **LTR AND COMMENTS** DTD APRIL 1, 1991  
FDER LTR AND **COMMENTS** DTD APRIL 12, 1991

**ADDRESSING EPA COMMENTS FROM LETTER DATED APRIL 1, 1991:**

1, Concerning comment #1 of EPA comments dtd 2/26/91, we received clarification through the conversation on April 19, 1991 between Ms. Suzanne Sanborn and Ms. Allison Drew. Therefore, we have included in the section titled "Overall Management Approach" a brief description of the SMP schedules which is identified on page 2 of 80 (SMP dtd June 3, 1991) for 1991 deliverable and the projected schedules identified on page 9 of 80 for deliverables and outlying years (Table 1-3, SMP dtd June 3, 1991).

We have also provided on page 5 of 80 (SMP dtd June 3, 1991) the criteria for grouping PSCs into OUs.

Under each OU, we have provided a brief description of each OU, due dates for primary deliverables, target dates for secondary deliverables, projected dates for projected deliverable, a Gantt Chart for each OU, and a listing of time schedules for each OU through the publishing of the public notice for the Record of Decision. The Gantt Chart exhibits years through 1993 (Dec 31, 1993) for each OU.

2. Concerning comment #2 of EPA comments dtd 2/26/91, we have modified paragraph 2 of page 2 of 80 (SMP dtd June 3, 1991) to incorporate your suggestion in clarifying the identity of the 17 OUs. Changed to read "the 17 PSCs requiring RI/FS and the 3 areas to be considered if supporting data warrant"...

3, Concerning comment #3 of EPA Comments dtd 2/25/91, we have briefly provided a description of each OU (type and extent of contamination, general hydrogeologic information, etc.). Information was taken from IAS, VS, CS, RFA, and CRP.

4. Concerning comment #4 of EPA comments dtd 2/26/91, 1st paragraph; we have provided OU-specific all primary and secondary deliverables for 1991 and out-year projected deliverables.

Enclosure (1)

5. Concerning comment #4 of EPA comments dtd 2/26/91, 2nd paragraph: we have take *your* suggestion of reorganization of the two schedules to facilitate "OU-specific" listing of deliverables for 1991 (compliance schedule) and 1992-1993 (out-year projected schedule) and have included Table 1-3 on page 9 of 80 (SMP dtd June 3, 1991).

6. Concerning comment #5 of EPA comments dtd 2/26/91, we have identified and clarified all transmittal dates as the following: the transmittal dates for primary deliverables to be "Due Dates", the transmittal dates for secondary deliverables to be "Target Dates", and the transmittal date for projected deliverables to be "Projected Dates". These changes were made to clarify the previous use of terms "Deadline" and "Projected".

7. Concerning comment #6 of EPA comments dtd 2/26/91, we have provided Gantt Charts for each OU through 31 Dec 1993, as well as providing a listing of all program events through the publishing of public notice for the Record of Decision.

8. Concerning comment #7 of EPA comments dtd 2/26/91, the Baseline Risk Assessment will be identified as a secondary document as identified in the FFA, Section VIII D.1.c.

9. Concerning comment #8 of EPA comments dtd 2/26/91, 1st paragraph, we understand that EPA has a policy titled EPA Policy Directive 9355.0-20, which states that the RI/FS process leading to a ROD should not exceed 18 to 24 months. The DoN shall proceed in a timely, efficient, and effective manner. Also as stated in the FFA page 29 of Section IX, the Navy shall conduct work identified in all provisions of RCRA, CERCLA, the NCP, as amended, and as provided for in pertinent written US EPA or State issued guidance or policy, and other applicable Federal or State law.

EPA and FDER, as identified in the FFA, shall identify all pertinent written guidance in response to written requests by the Navy for said guidance to assist the Navy in satisfying the requirement pursuant to the FFA.

10. Concerning comment #8 of EPA comments dtd 2/26/91, 2nd paragraph, we **have** taken your recommendation into consideration when developing schedules and program events. The DoN shall proceed in the most timely, and cost effective, and efficient manner without causing an impact on the quality of work and data obtained. We have provided schedules which run between 22 months to 30 months.

11. Concerning comment #8 of EPA comments dtd 2/26/91, 3rd paragraph, we have submitted 3 draft SMPs independently of each other to be reviewed and commented on during the comment period to reach the final submittal. We have reviewed your proposed Table 1, and have noticed that a compressed schedule has been developed using both draft SMP (SMP January 19, 1991, and SMP February 26, 1991) proposed schedules. The Final SMP and its schedule must be agreed upon by all Parties of the FFA. We have provided a revised SMP, the Final SMP, and a similar Table identified as Table 1-3 of page 9 of 80 (SMP dtd June 3, 1991) for your review and consideration for approval. The Navy has taken into consideration all previous comments when developing a timely executable schedule and program events.

12. Concerning comment #9 of EPA comments dtd 2/26/91, to clarify the PSCs requiring RI/FS: The FFA specifies those sites where an RI/FS is required. The discrepancy is based on the fact that the Workplans were developed and submitted prior to listing of the Facility on the NPL, and the initiation of the FFA negotiations. At that time the Workplans were developed to primarily meet HSWA requirements with CERCLA concurrence. At the same time the Navy was concerned about eliminating any site (PSC) from further consideration based on little or no technical information. Therefore, the Navy committed through the Workplans to do Phase I and Phase II at all PSC's (SWMU's), and to do a full RI/FS (with Risk Assessment etc.) only at those sites (PSC's or SWMU's) requiring on RFI under the HSWA permit. The CRP was developed after the submission of the Workplans, but before negotiation of the FFA. The CRP, therefore only listed those SWMU's where an RI/FS//RFI would be performed. The priorities assigned to the PSC's in the Workplan are based purely on previous knowledge of the PSC's or types of contaminants suspected without regard to regulatory status, in other words "worst first".

13. Concerning comment #10 of EPA comments dtd 2/26/91, we have provided a section titled "Rational for Operable Unit Site Groupings". In this section, we have identified the criteria used to generate the RI/FS OU groupings. We are coordinating with our RCRA section to obtain information about RCRA investigations and Corrective Action measures in defining as OU pertaining to existing groundwater contamination assessment and remediation. We agree with EPA that sufficient information exists to permit grouping of some PSCs into OUs by the other than simply geographic proximity.

**Addressing FDER Comments From Letter Dated April 12, 1991:**

1. We will track the progress of the sites undergoing screening and not yet identified as Remedial Investigation/Feasibility Study Operable Units in our quarterly reports.
2. We have provided a brief description of each OU and the extent of contamination known, and we have provided a OU-specific Gantt Chart, due dates for primary documents, target dates for secondary documents.
3. We appreciate all your efforts to expedite review times whenever possible. We are identifying our contracting process that would provide in the future timely contract award procedutes. We are proceeding as timely as possible under the provisions of the FFA. We look forward to a cooperative effort on all parties of the FFA.