



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

2155 EAGLE DR., P. O. BOX 10068

CHARLESTON, S. C. 29411-0068

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THE SIGNER OF THIS LETTER  
REFERS TO:

5090/11

Code 18211

18 JUL 1991

N00204.AR.000247

NAS PENSACOLA

5090.3a

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Eric Nuzie  
Florida Department of Environmental Regulation (FDER)  
Federal Facility Coordinator  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 37399-2400

Dear Mr. Nuzie:

We are in receipt of your July 2, 1991 approval letter for the Final Site Management (SMP) dated June 3, 1991.

We appreciate any recommendations that you can provide on "time saving measures" as stated in your letter.

We are in receipt of EPA Region IV comments for the submitted SMP dated June 3, 1991. We will be resubmitting a modified Final SMP incorporating EPA's comments prior to the yearly update of the Approved Final SMP. We request your review and concurrence with the EPA comments and revisions.

Thank you for your cooperation and your review. Please contact Ms. Suzanne O. Sanborn (Code 18211) at (803) 743-0574, if you should have any questions.

Sincerely,

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

copy to:  
NAS Pensacola (Mr. Ron Joyner)  
EPA (Ms. Allison Drew)

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DEPARTMENT OF THE NAVY  
SOUTEDIV COMMENTS  
JULY 18, 1991  
SITE MANAGEMENT PLAN (SMP)  
FOR  
NAVAL AIR STATION PENSACOLA, FLORIDA

ADDRESSING: EPA FAXED LTR AND COMMENTS DTD JULY 18, 1991

PAGE 1 OF 2

ADDRESSING COMMENTS WHICH MUST BE ADDRESSED IN CURRENT SMP FOR APPROVAL:

1. Concerning Comment #1 on June 3, 1991 Final SMP: Page 2 of 80, Paragraph 2- the first sentence of the paragraph states that, "twenty-two (22) PSCs are undergoing screening..." The third sentence states that, "screening is underway or planned for nineteen (19) PSCs..." Table 1-1 identifies 18 screening sites. All screening sites must be identified in the SMP and tracked in quarterly progress reports.

The discrepancy has been corrected and further clarification has been made to the second paragraph on page 2 of 80 of the SMP dtd 6/3/91 as follows:

"There is a total of 42 PSCs which have been identified at NAS Pensacola (See Table 1-1). Of the 42 PSCs (see Table 1-1), seventeen (17) PSCs are undergoing screening and twenty (20) PSCs require RI/FS as identified in the FFA. The screening process of the 17 PSCs is due to the present data quality objective inadequacies and data gaps, or due to a preliminary determination that no further action is required. The 17 PSCs undergoing screening will not be included or tracked in the SMP, but will be tracked in a different methodology. Screening is currently underway or planned for seventeen (17) PSCs in the IR program, and a schedule status will continually track the investigation progress and provide updates to the Remedial Project Managers (RPMs). The five (5) remaining PSCs which will not proceed in the IR Program are PSCs Sites 19, 20, 21, 23, and 37, and these sites have been transferred to the Underground Storage Tank (UST) Program. These five (5) PSCs are not included or tracked in this SMP. The UST Program is a State and EPA regulated program, in which the State of Florida has a regulated process for the remediation of petroleum contaminated sites. A few of the total PSCs have been grouped together (both screening and RI/FS PSCs) in order to investigate sites more efficient. See Table 1-1 of the SMP for a complete list of PSCs undergoing RI/FS and screening."

We also plan to track the PSC screening site in quarterly reports, however, they will only appear on Table 1-1 of the SMP for reference.

Enclosure (2)

DEPARTMENT OF THE NAVY  
SOUTBDIV COMMENTS  
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PAGE 2 OF 2

2. Concerning Comment #2 on June 3, 1991 SMP: Page 3-4 of 80, Table 1-1- Appendix A of the FFA requires that an RI/FS be conducted for Sites 1, 2, 3, 9, 11, 15, 17, 22, 26, 27, 29, 30, 31, 32, and 38 through 42. Please make the appropriate corrections to this table.

We have made the appropriate corrections to Sites 11, 15, 22, 26, and 27. Changing the statute requirements from H,C screen or C screen to H, C RI/FS or C RI/FS as appropriate. The other sites 1, 2, 3, 9, 29, 30, 31, 32, and 38 through 42 were correct as presented in the 6/3/91 SMP.

3. Concerning Comment 3 on June 3, 1991 SMP, Page 1 of Expedited Schedule- the time allotted for field work, data assessment and report preparation in this schedule (240 + 120 + 90 days) actually exceeds that allotted in the enforcement schedule (360 days). The purpose of the Expedited Schedule is clearly to reduce the time required to complete each task. This situation must be remedied.

Per the discussion with Ms. Allison Drew on July 19, 1990, we have clarified that the expedited schedule is correct and that it shows the combination of the RI/FS reports. The enforcement schedule is broken down showing the RI report and the FS report schedules. The expedited schedule is taking less time.

COMMENTS WHICH MUST BE ADDRESSED IN THE SMP DUE SEPTEMBER 1, 1991:

1. Concerning Comments #1 through #12 of the June 3, 1991 SMP: We are in the processing of reviewing and incorporating those recommended and appropriate comments for the September 1, 1991 yearly update on the SMP. These comments will be reflected that submittal.

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