



DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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32501.000
03.03.00.0035

PLEASE ADDRESS REPLY TO THE
COMMANDING OFFICER, NOT TO
THE SIGNER OF THIS LETTER.

REFER TO:
5090/13
Code 1851

02 DEC 1993

N00204.AR.000650
NAS PENSACOLA
5090.3a

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Allison Drew
U. S. EPA, Region IV
4WD/FFB
345 Courtland Street, NE
Atlanta, GA 30365

Subj: DRAFT FY94 SITE MANAGEMENT PLAN (SMP) NAVAL AIR STATION
(NAS) PENSACOLA, FL

Dear Ms. Drew:

The Navy has completed its review of the comments received from U.S. EPA for the subject document of 28 October 1993. Our response to the comments are enclosed for your review as enclosure (1). The Final 1994 Yearly Site Management Plan (SMP) for the Naval Air Station (NAS) Pensacola, FL, is submitted with the corrective actions as explained in enclosure (1), incorporated in the document as enclosure (2). The Navy received a letter of 5 November 1993, from FDEP which stated "The document appears acceptable in its present form."

If you should have any questions regarding the enclosures, please contact Mr. Bill Hill at (803) 743-0324.

Sincerely,

WILLIAM J. HILL
Environmental Engineer
Installation Restoration I Division

Encl :

- (1) Navy's Response to Comments
- (2) FY94 SMP

copy to:

NAS Pensacola (Mr. Ron Joyner, Code 18520) (w/encl)
NAS Pensacola (Ms. Linda Weber, Code 18521) (w/encl)
Ensafe (Mr. Henry Beiro) (w/encl)

NAVY RESPONSE TO U.S. EPA'S **REVIEW COMMENTS**
DATED 28 OCTOBER 1993
ON THE **DRAFT FY 94 SITE MANAGEMENT PLAN (SMP)**
FOR NAVAL AIR STATION (NAS) PENSACOLA, FL

1. **GENERAL COMMENTS:**

1) Recommended a list of UST sites along with a map showing the locations of each UST be included as an attachment or appendices to the SMP in order to keep Parties informed of schedules which may impact the IR program.

The Navy concurs the recommendation has merit but will not include this information as part of the SMP document at this time since it may delay the schedule of the SMP. This information will be compiled and added in the future.

2) Recommended in the interest of streamlining, submit the Draft Record of Decision (ROD) concurrently with the ~~Draft~~ Final Proposed Plan.

The Navy position on this recommendation is there is a possibility of risk associated with because the public comments may not accept the Proposed Plan thus having to duplicate the efforts of the Draft ROD. The Navy will not adopt this recommendation at this time.

2. **SPECIFIC COMMENTS:**

1.a) Your comment requested a brief description of each screening PSC that is not associated with an Operable Unit.

The Navy's position is that since screening sites do not have enforceable scheduled dates a brief description is not required unless the site is transferred to a RI status. A clarifying statement has been added to this paragraph identifying screening sites 14 in Category 5 and screening sites 4, 5, 6, 7, and 16 in Category 7 are screening sites that are not associated with an Operable Unit. Category 8, screening site 36 has also been added with this explanation to explain why no projected schedule is included.

1.b) Your comment requested Category 1, PSC 35 be updated from a screening site to a RI/FS status and added to OU 10.

The Navy concurs and has updated the SMP to reflect this change.

2.) Comment stated the second sentence of para. 1 on page 8 was fragmented.

The Navy concurs and has revised this sentence.

3.) Comment stated the last sentence on page 9, Section 4 is not clear as to its intent.

The Navy concurs and has **revised** this **sentence**.

4.a) Recommended **any** actual duration dates for OU 10 which were not known at the time of the Draft *SMP* be **incorporated**.

The yearly update of this document is **intended** to **show current events not pasted history**; therefore the **Navy** rejects this **recommendation**.

4.b) Per a telephone conversation between Ms. Linda **Martin** and Ms. **Allison Drew** on 25 October 1993 **U.S. EPA recommended**:

(1) The **next** version of the RI report for OU 10 may be considered Draft **Final** provided that (i) agency review be kept at 60 days according to the **FY 94 SMP** schedule, 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**.

(2) **EPA shall** complete its review of the Draft Report and **provide draft** comments **within 30 days** of receipt of the **next** version of the **RI Report**. **Final comments** on the Draft **FS Report** would be submitted **no later than 45 days after receipt** of the **next** version of the **RI report**. The Navy shall revise and submit the Draft **Final FS Report**, addressing all comments, by **12, January 1994** in order to maintain the **Draft FY94 SMP** scheduled date.

Per another telephone conversation **between Mr. Bill Hill** and Ms. **Allison Drew** on 5 November 1993, it was **agreed that** the **above recommendation allowed only a 30 day time** frame for the Navy to receive comments, **respond to comments, incorporate comments, and mail out the Draft Final FS Report** in lieu of the **90 days allotted** for this Report as a result of **U. S. EPA's** position of not reviewing the Draft **FS Report** submitted 7 July 1993. Both parties **agreed** to extend the **FY94 SMP schedule** by **30 additional days** in order to perform the above **tasks**. **FDEP** was contacted on 8 November 1993 for **their concurrence** of this action and **Mr. David Clowes** **agreed to** the extension. The schedule has been revised.

5.) Comment requested the Primary and **Projected** Deliverable lists for Category 3 be revised to include the Draft **Final RI Report** and the **Final RI Report**.

The Navy concurs and has **revised** these lists.