



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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NAS PENSACOLA
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SEP 28 1994

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

SUBJ: Draft 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 FY95 Site Management Plan (SMP) for the Naval Air Station (NAS) Pensacola, which was received in this office on September 6, 1994. Our comments are enclosed. As per Section XXIII.D. of the Federal Facilities Agreement (FFA), a Draft Final SMP which incorporates our comments must be submitted within thirty (30) days of your receipt of comments from all Parties.

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

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

1. Page 2, Paragraph 2:

Two additional sites have been identified at NAS Pensacola since the SMP was last revised: (i) the buried drums adjacent to site 10 and (ii) the solvent plume identified in the ground water near building 3380. The SMP must be revised to include these sites as discussed at the September 1994 RPM/Partnering Meeting. Also, please revise the total number of sites to include other changes which the Parties have agreed to at previous meetings, including:

- the transfer of sites 19, 20, 21, 23 and 27 from the IRP program to the UST program
- the merging of site 31 with site 30

These changes should be made throughout the SMP text as needed.

2. Page 2, Paragraph 3:

As discussed and agreed to at the September 1994 RPM/Partnering Meeting, please insert a sentence in this paragraph indicating that for sites which are currently listed as RI sites, if, upon review of the RI Report, the Parties agree that no remedial action is needed, then a draft Proposed Plan will be submitted in place of a draft FS. The Parties should make this decision as early in the process as possible and revise the enforceable schedules accordingly.

3. General Comment:

As discussed at the September 1994 RPM/Partnering Meeting, please add another section to the SMP text describing the status of the Community Relations Plan. Also note that per Section VIII.J. of the FFA, if a Party desires to modify a Primary Document following finalization of that document, they must submit a concise written request to the other Parties for consideration and consensus.

4. Page 18:

During the September 1994 RPM/Partnering Meeting, the Navy indicated that some field and laboratory work (Phase IIB) has yet to be completed for Site 2. Yet the draft RI Report is due on November 23, 1994. The Navy should take this information into consideration in preparing the final FY95 schedule for this site.

5. Pages 30 through 32 and 35 through 37:

The enforceable schedules for sites 40, 41 and 42 must be revised to accurately reflect the recent agreements made by the Parties to complete Phase I prior to submitting the site-specific SAPs for these water bodies, thereby eliminating the need for a Phase I Technical Memo.

6. Page 41:

In reviewing the data collected to date for Category 5 sites, EPA has stated that additional data must be collected for sites 14 and 34 in order to prepare a complete RI Report for these sites. The Navy should take this requirement into consideration in preparing final FY95 schedules for these sites.

Also, add site 14 to the heading for this schedule.

7. General Comment:

The goal of the Partnering process, and of our respective Agencies, is to accomplish adequate cleanup of the base as expeditiously as possible. Currently, the primary means for measuring such success is through the completion of RI/FS and RD/RA activities (e.g. RODs and Final Remediation Reports). In the interests of demonstrating measurable success to the public and to our respective agencies, the schedules must be revised to indicate that at least one Record of Decision will be finalized in FY95.

8. General Recommendation:

The Navy is encouraged to simplify the SMP schedules by reducing the number of tasks presented. The completion deadlines for many of these tasks are not enforceable, and therefore not essential components of the schedules. Simplification of the schedules would make modification and review of the schedules much less cumbersome. Alternate methods (e.g. meeting handouts, FAXed memos) could be used to track the numerous non-enforceable tasks more accurately, since these are subject to day-to-day change. Simplification of the enforceable SMP schedules, coupled with more frequent, informal updates of non-enforceable tasks, should enable the Navy to focus more readily on the essential deadlines, and to manage the schedules more effectively in order to meet these deadlines.