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CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. David Clowes
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

Subj: 1995 DRAFT FINAL SITE MANAGEMENT PLAN (SMP), NAVAL AIR
STATION PENSACOLA, FL

Dear Mr. Clowes:

The Navy respectfully submits the 1995 Draft Final SMP as Enclosure (1). Comments received 13 October 1994 from FDEP and 4 October 1994 from EPA have been received and the following actions have been taken:

FDEP stated the final version should reflect the extension request for Category 1 Draft Final Remedial Investigation Report.

Response: Category 1 schedules have been revised to reflect requested time extensions.

Comments from EPA stated the following:

1. 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

Response: Only the buried drum site was agreed to be added as Site 43 and a schedule has been added to the SMP. The solvent site at building 3380 has been investigated as part of Site 36 since it was suspected to have been generated from the Industrial Waste Line.

Changes to the SMP which the Parties have agreed to at 'previous meetings are included (see last paragraph on page 6).

2. As discussed and agreed to at the September Meeting, please insert a sentence in paragraph 3 on page 2 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, the 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.

Response: Concur. The first complete paragraph on page 5 has been revised to reflect this change.

3. 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 (CRP). 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.

Response: A paragraph has been added to the text describing the status of the CRP (see the second paragraph on page 5).

In response to your note, the Navy requests EPA and FDEP consideration and consensus to revise the CRP. The current document was issued in 1990 and a number of site status changes have been made as well as personnel changes to the different committees listed. Please allow us the opportunity to update this Primary Document in order to keep the public informed of changes in the IR Program.

4. 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.

Response: A modified schedule for this site has been added and since all Parties concurred with this decision no separate request for an extension is necessary. An independent schedule has also been developed for Site 39 based on the removal action accomplished at this site. This schedule does not include a FS Report since the RI Report will recommend No Further Action based on the results of the clean-up.

5. 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.

Response: The schedules for each of the referenced sites have been modified to reflect the agreements made by all Parties and that no formal extension request is necessary. Please note that reference to Tech Memos have been deleted from the schedules as agreed upon at the October RPM/Partnering Meeting.

6. 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.

Response: In order to comply with the above, an independent schedule has been developed for OU-8 (Site 3), OU-6 (Sites 9&29 w/Screening Site 34), and Screening Sites 10 and 14. Site 34 is proposed to be grouped with OU-6 since it is in the same geographical area similar to Screening Site 13 with OU-10. No formal extension requests are necessary since all Parties have agreed additional sampling must be collected.

7. 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 interest 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.

Response: The Navy concurs with this comment and will strive to complete a ROD this fiscal year as agreed at the October RPM/Partnering Meeting where an expedited schedule for Site 39 was developed. Note: Expedited schedules will not be included in the SMP.

8. 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.

Response: The Navy has reduced the number of tasks included in the proposed schedules by eliminating Tech Memos and separate response to comments. Data presentations, as necessary during the RI investigation, will be made which takes the place of the Tech Memos. An agreement among all Parties was reached to send response to comments with the revised Primary document. This should enable each reviewer to verify each response action has been incorporated in the Primary document.

If you should have any questions regarding the enclosure, please contact Bill Hill (Code 1851) or Bill Gates (Code 18510), at (803) 743-0324 or (803) 743-0360 respectively.

Sincerely,

WILLIAM J. HILL
Environmental Engineer
Installation Restoration I Branch

Encl:
(1) Revised FY 95 SMP

copy to:
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