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NAWC WARMINSTER
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LETTER AND THE U S EPA REGION III COMMENTS REGARDING THE EXTENSION OF
THE SUBMITTAL DATE FOR THE DRAFT FINAL REMEDIAL INVESTIGATION/ FEASIBILITY
STUDY FOR THE NAWC WARMINSTER PA
11/08/1994
U S EPA REGION III PHILADELPHIA PA

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

NOV 8 1994

Mr. Thomas Ames (87D00R14)
BRAC Environmental Coordinator
Naval Air Warfare Center
Aircraft Division Warminster
P.O. Box 5152
Warminster, PA 18974-0591

Dear Mr. Ames:

This letter regards the Navy's recent consultation with the Environmental Protection Agency (EPA) regarding the extension of the submittal date for the draft final remedial investigation/feasibility study (RI/FS) for the Naval Air Warfare Center (NAWC) in Warminster, Pennsylvania.

Through this consultation, EPA Region III concurred that the submission date of December 5, 1994 for the draft final RI/FS for NAWC, as required by the National Defense Authorization Act for Fiscal Years 1992 and 1993, PL 102-190, Section 334, may be extended for at least six months.

In light of this deadline extension, EPA Region III requests the Navy propose to EPA a revised schedule for completion of the draft final RI/FS for NAWC. The subject RI/FS should include all RI/FS work necessary to meet CERCLA requirements at NAWC. As reflected in previous correspondence, this work should address the entire NAWC property, as necessary. The subject schedule should include, in addition to a deadline date, all significant interim milestone dates. It is suggested that media and/or areas of potential concern be divided into operable units, where appropriate, and that concurrent schedules be developed for these operable units as needed. This schedule may be best presented in the form of a "Gantt chart".

Section XV. of the Federal Facility Agreement for NAWC signed by the Navy and EPA on September 20, 1990 suggests that the Navy should propose the deadline for the completion of a draft final RI/FS within 21 days of a request by EPA. However, given the complexity of the RI/FS and our request for interim milestone dates, a proposal within 21 days may not be reasonable. On the other hand, it is our understanding that the Navy plans to complete a draft revision of the BRAC Cleanup Plan by December 31, 1994. Given that the new deadline date and milestone

schedule would be appropriate to include in the updated BCP, we suggest the Navy propose a new deadline date and milestone schedule to EPA by mid-December 1994. In this case, EPA may comment on the proposal prior to inclusion in the draft revised BCP.

We suggest this matter be included on the agenda of our next BRAC Cleanup Team meeting and otherwise look forward to coordinating with the Navy on the development of the new RI/FS schedule. Should you have any questions regarding the above, please give me a call.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

cc: Orlando Monaco, NORTHDIV
Bob Lewandowski, NORTHDIV
Ben Mykijewycz
David Kennedy, PADER