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NAS CECIL FIELD, FL
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT SITE MANAGEMENT
PLAN FOR FISCAL YEAR 2007 NAS CECIL FIELD FL
10/26/2006
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

Site Mang. Plan 2007

CTO 0025

October 26, 2006

EMAIL & US MAIL

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BRAC PMO SE

Attn: Mark Davidson
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

SUBJ: Draft Fiscal Year 2007 Site Management Plan; Naval Air Station, Cecil Field, Florida

Dear Mr. Davidson:

EPA has targeted Naval Air Station Cecil Field (NASCF) for Construction Completion during Fiscal Year (FY) 2007. The Environmental Protection Agency (EPA) has reviewed the subject document and therefore has the following comment:

Please revise the 2007 Draft Site Management Plan to show all Records of Decision (RODs) being signed as early as possible, but certainly no later than August 30, 2007.

This has been discussed at recent Tier I, II, and Tier III Meetings. EPA requests the Navy's assistance in accomplishing this commitment. EPA is committed to doing everything possible to support the Navy in making this happen.

Only two sites remain to have Records of Decision (RODs) signed, Operable Unit (OU) 5, Site 15, the Blue 10 Ordnance Area; and OU 9, Site 59, Building 324/1845. Although a lot of work remains to be completed, work is well under way at both of these sites. EPA is confident that all necessary work can be completed and these that these RODs can be signed this Fiscal Year in time for Construction Completion to the achieved.

NASCF enjoys a high-performing, self-facilitated team that serves as a model for others in problem solving and work product generated. The team is highly motivated, has a high level of trust, and has a good working relationship. For this reason, EPA management is confident that this team can accomplish all necessary work at NASCF so Construction Completion can be achieved this Fiscal Year.

Factors Critical to Accomplishing Construction Completion at NASCF in FY 2007 Are:

- Thorough planning of the Site Management Plan (SMP) with heavy involvement of the entire Project Team in a conference call by close of business November 3, 2006, to

discuss a Revised Draft SMP for 2007 with a compressed schedule. Of course, FDEP is an integral part of this entire process and needs to be on that conference call.

- Voluntary Interim Removal Actions (VIRAs) and “thinking outside of the box.”
- Focusing on solutions rather than problems.
- Doing as many tasks in parallel, rather than in series, as possible.
- Doing as many tasks as soon as possible and letting the paperwork catch up later.
- Prioritizing work so NASCF work is done as nearly first as possible.
- Compressing schedules rather than following those stated in the Federal Facilities Agreement (FFA).
- Timely communication. As work progresses and new developments occur, unscheduled telephone calls “24/7” are inherent to the success of this project. EPA encourages use of cellphones, especially outside of normal duty hours and anytime a person is otherwise unavailable.
- Occasional work outside of normal duty hours, as needed, to keep the process moving.
- Empowerment of all BCT members.
- Decision making “at the table” by the BCT.
- Identification of key support team personnel within each organization. Understanding by these support team personnel of the need for rapid turnaround on support requested is critical.

Until the last ROD is signed, EPA requests that the BCT, and if possible the Project Team, seriously consider meeting monthly with frequent conference calls in between, as needed. Some meetings may last only part of a day but those meetings are very important. Every meeting should include a complete discussion of OU 5, Site 15, the Blue 10 Ordnance Area; and OU 9, Site 59, Building 324/1845. EPA is agreeable to having as many meetings in Charleston, Jacksonville, or Tallahassee as necessary to accommodate the Navy’s and FDEP’s travel budgets. While this may appear to be too much at first, the value of these meetings will be realized more and more as the time comes for signature of that final ROD. Throughout this process, there is no substitute for “real-time” discussions of the pros and cons of present and upcoming tasks with “real-time” decisions “made at the table.”

EPA has already tasked TechLaw to complete the Preliminary Site Closeout Report (PCOR) begun two years ago by Gannett Fleming. Key personnel working on this task are the same as those who worked on a similar task for Gannett Fleming, and the same as those who prepared the PCOR for Homestead Air Force Base in their Fiscal Year 2006 Construction Completion. Everyone’s assistance in helping Rick Hardy and Sarah Cook locate the information they need would be greatly appreciated. After the final ROD is signed, this PCOR document will have to be submitted to EPA Headquarters for their approval.

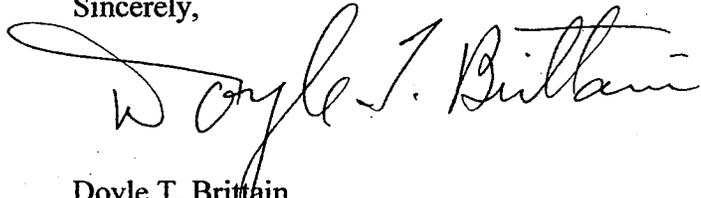
In late August 2007, EPA will need to conduct an inspection of every site at NASCF to ensure all appropriate action has been taken and, as appropriate, Land Use Controls, groundwater treatment systems, and/or Long Term Monitoring Systems for groundwater are in place.

Therefore, EPA requests that the subject Draft 2007 SMP be revised to show both RODs signed as early as possible but certainly no later than August 30, 2007, because of the other work that has to be done after the RODs are signed to document Construction Completion.

I apologize for writing such along letter when EPA has only one comment. However, the nature of that comment is critical. Construction Completion can be accomplished only if the Project Team implements the critical factors identified above now, and makes significant revisions to the Draft FY 2007 SMP by close of business November 3, 2006. Everyone's full cooperation would be appreciated.

If you have any questions, please call me at (404) 562-8549 or Earl Bozeman at (404) 562-8545.

Sincerely,

A handwritten signature in black ink that reads "Doyle T. Brittain". The signature is written in a cursive style with a large, sweeping initial "D".

Doyle T. Brittain
Senior Remedial Project Manager

cc: David Grabka, FDEP
Mark Speranza, TTNUS
Mike Halil, CH2MHill
Earl Bozeman, EPA
Martha Brock, EPA