

N60200.AR.008868
NAS CECIL FIELD
5090.3a

LETTER AND U S NAVY RESPONSE TO U S EPA REGION IV COMMENTS TO SITE
MANAGEMENT PLAN NAS CECIL FIELD FL
10/31/1991
NAVFAC SOUTHERN



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

2155 EAGLE DR., P. O. BOX 10068

CHARLESTON, S. C. 29411-0068

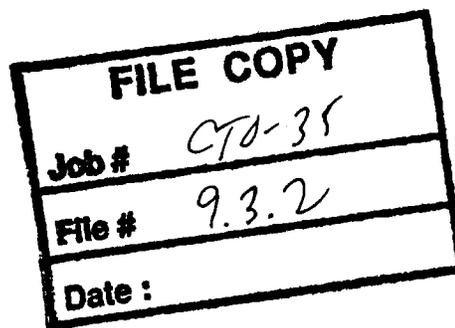
PLEASE ADDRESS REPLY TO THE
COMMANDING OFFICER, NOT TO
THE SIGNER OF THIS LETTER.
REFER TO:

5090/11
Code 18212

31 OCT 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Michelle Glenn
U.S. Environmental Protection Agency
Region IV
Waste Management Division
RCRA and Federal Facilities Branch
345 Courtland Street
Atlanta, GA 30365



SITE MANAGEMENT PLAN COMMENTS
NAS CECIL FIELD, JACKSONVILLE, FLORIDA

Dear Ms. Glenn:

In response to your offered comments, the following summarized comments and Navy response is provided:

FORMAL SCHEDULE

COMMENT

Include a groundwater operable unit.

RESPONSE

At this time, groundwater operable units cannot be defined. We are only in the field stage of source characterization and groundwater impact. Accurate site information that describes groundwater impact and their possible relation to nearby sites is required to define groundwater operable units. Completion of the Remedial Investigation should allow groundwater operable units to be defined.

COMMENTS

Clarify transmittal date for the Draft RI/FS Report.

RESPONSE

A revised deliverable summary page is provided.

COMMENT

Why not speed up schedule for work plans for Operable Units 3,4,5 and 6?

RESPONSE

A tremendous amount of resources would be required of the contractor and the lead federal agency RPM to coordinate, review and manage work plan preparations for the next set of Operable Units (3,4,5 and 6) during the field

4 NOV 1991

SITE MANAGEMENT PLAN COMMENTS
NAS CECIL FIELD, JACKSONVILLE, FLORIDA

investigations of existing Operable Units (1,2 and 7). The Navy RPM is responsible for field oversight and coordination during the investigation. Additionally, the schedule submitted assumes site characterization will be simple and straight forward. Site data collected recently indicates the sites are much more complex than indicated in the field schedule.

EXPEDITED SCHEDULE

COMMENT

For Operable Units 1,2 and 7 the schedule is two months later than planned last year. The 181 days for the Record of Decision is excessive.

RESPONSE

Review, preparation, and response periods of 15, 45 and 30 days are incorporated for expedited schedules. The schedule agreed to last year did not provide detailed milestone dates. Using the review and response periods identified above provides the schedule as indicated. Additionally, this schedule starts field work one week later to reflect actual scheduling.

COMMENT

For Operable Units 3,4,5 and 6 is this schedule correct?

RESPONSE

No, the wrong year was entered at the beginning of this timeline. Work should reflect January 1992 instead of January 1991. A new schedule is provided.

A revised Site Management Plan incorporating these changes is provided. Please contact Mr. Cliff Casey, Code 18212, the Navy Project Manager, at (803) 743-0561 if you have questions.

Sincerely,

R. DAVID CRISWELL, P.E.
MANAGER, INSTALLATION
RESTORATION, WEST SECTION

Encl:

- (1) SMP 30 Oct 91
- (2) Schedule 30 Oct 91 Expedited

Copy to:

NAS Cecil Field (Code 18IR)
ABB Environmental (Peggy Layne)