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UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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

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NAS PENSACOLA
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OCT 23 1990

4WD-RCRA & FF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Criswell
NAVFAC-ENGCOM
Southern Division
P.O. Box 10068
Code 11526
Charleston, S.C. 29411-0068

Re: Approval of the Phase I Work Plan and the
General Quality Assurance Project Plan for Naval Air
Station Pensacola

Dear Mr. Criswell:

EPA has reviewed the draft final Phase I Work Plan and the General Quality Assurance Project Plan (GQAPP). EPA approves the Phase I Work Plan only; all succeeding phases must be submitted as draft primary documents to EPA for review and comment. Project Managers may agree as specified in the FFA, Section VIII G. 2, to a shorter time period for review of these discrete portions of the Work Plan. EPA is still of the opinion that the bulk of the field investigation should be completed in Phase 11, including thorough definition of contamination at all depths in the surficial aquifer and below the low permeability zone for all operable units. EPA suggests this be kept in mind when preparing the Phase II Work Plan.

EPA conditionally approves the GQAPP for use in all phases of the remedial investigation. However, a justification for using an alternate well construction material (PVC) must be submitted to EPA for our review and comment prior to Phase 11. Enclosed please find a letter dated March 23, 1990, that outlines the information needed for such a justification. Since screening data only is being gathered under Phase I, such a justification is unnecessary at this time.

Many items in the Management Plans submitted with the Work Plan are contrary to the Federal Facility Agreement (FFA). Please note that the requirements of the FFA take precedence to your planning documents. In addition, EPA has not received the draft final Community Relations Plan (CRP). EPA will need to review the draft final CRP as soon as possible since the Navy is planning to start field work immediately.

If there are any questions concerning this letter, please contact Ms. Nancy Dean at (404) 347-3016.

Sincerely yours,


James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

cc: Ron Joyner, NAS Pensacola
Harry White, OPA, NAS Pensacola
Eric Nuzie, FDER