



UNITED STATES ENVIRONMENTAL PROTECTI  
REGION IV

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ATLANTA, GEORGIA 30365

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NAS PENSACOLA  
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APR - 1 1991

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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Ted Campbell  
Remedial Activities Branch  
Department of the Navy - Southern Division  
Naval Facilities Engineering Command  
1255 Eagle Drive  
P.O. Box 10068  
Charleston, South Carolina 29411-0068

Re: Site Management Plan  
NAS Pensacola NPL Site  
Pensacola, Florida

Dear Mr. Campbell:

The Environmental Protection Agency (EPA) has reviewed the Site Management Plan (SMP) which was received in our office February 26, 1991. Several problems still exist with the SMP in its present format. EPA's general and specific concerns are outlined in the following pages. We strongly urge you to respond to these comments promptly and effectively so that the next SMP submitted is acceptable to all parties. It is EPA's feeling that the SMP for NAS Pensacola has already gone through an inordinate number of review drafts.

If there are any questions regarding the enclosed comments, please contact me at (404) 347-3016. I would be glad to assist you in addressing any of the agency's concerns.

Sincerely yours,

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

Enclosure

CC: Ron Joyner, NAS Pensacola  
Eric Nuzie, FDER  
Mr. James Malone, SOUTHNAVFACENGCOM

EPA COMMENTS ON 2/26/91  
SITE MANAGEMENT PLAN FOR  
NAVAL AIR STATION - PENSACOLA

1. Page 1 of 12 - The section entitled "Overall Management Approach" should include a listing and brief description of the SMP schedules supplied in the remainder of the document:

(i) Deliverables for the current year (1991), including a complete listing of delivery dates for primary and secondary documents (the compliance schedule); and

(ii) a projected schedule of program events through the end of 1993. This schedule will be updated and revised on a yearly basis to reflect newly-obtained information, program accomplishments and changes in project priorities

(iii) a Gant chart illustrating the time frame for all activities associated with the preparation, submittal, review and finalization of the deliverables for each OU.

2. Page 1 of 12; Paragraph 5, - The identity of the 17 OUs would be better clarified by replacing the phrase, "the 20 areas of consideration" with "the 17 PSCs requiring RI/FS and the 3 areas to be considered if supporting data warrants."
3. Pages 2 through 12 - A description of each Operable Unit (type and extent of contamination, general hydrogeologic information, etc.) must be provided using existing information and data (e.g. the IAS, VS, CS, and RFA). The Jacksonville SMP provides a good example of the amount of detail recommended.
4. Pages 3 through 12 - In the schedules currently provided for FY91 deliverables and out-year projected deliverables the deliverables listed are not OU-specific. As specified in the FFA, all primary and secondary documents submitted are for a single OU only. Taking the Phase I Data Reports for OUs 1-5, for example, the schedule must clearly indicate that a total of 5 Phase I Data Reports, including one for each OU, will be submitted on June 8, 1991.

EPA would like to suggest the following reorganization of the two schedules to facilitate this "OU-specific" listing of deliverables. Since the deliverables listed for all 17 OUs are identical in name, a spreadsheet could be set up listing OU No. (and possibly "Type" and "PSC No.") down the left-hand side of the page and deliverables (e.g. Draft RI Report (P)) across the top. If the given deliverable for the OU is due during 1991 (compliance schedule) or during

1992-93 (out-year projected schedule) the compliance or projected date could then be entered in the appropriate "block".

5. Pages 3, 5, 7, 9, 11 - The current schedules reflect a confusion as to the use of the terms "Deadline" and "Projected". "Deadline" indicates a compliance date, i.e. any deliverable due date which occurs during 1991. "Projected" indicates an out-year projection due date, i.e. a deliverable due date for a year later than 1991.
6. Pages 4, 6, 8, 10, 12 - The Gant charts provided should be extended to include out-year projected deliverables through the end of 1993; or, at a minimum, through the Record of Decision.
7. Pages 3, 5, 7, 9, 11 - The Baseline Risk Assessment (BRA) should be a primary document. It is referred to as a secondary document if it will be submitted independently of the RI report. Technically, the BRA is part of the RI.
8. Pages 3, 5, 7, 9, 11 - The compliance and projected due dates for several OUs need significant revision. As mentioned in our comments submitted to you in February 1991, Policy Directive 9355.0-20 states that the RI/FS process leading to a ROD should not exceed 18 to 24 months.

The draft FS Report should be submitted no later than 3 months after the Draft RI. Treatability Studies and the submission of associated reports should be performed during the phased field investigation, prior to submission of the Draft RI.

In addition to these recommendations, the following deliverable due dates were either stated in the draft SMP submitted to EPA on January 24, 1991, or discussed and agreed upon by the SOUTHNAV and EPA RPMs for NAS Pensacola following EPA's most recent submission of comments to SOUTHNAV but prior to SOUTHNAV's resubmission of the most recently-revised SMP. These dates, as restated on Table 1, must be incorporated into the SMP before it can be approved.

9. Page 2 of 12 - Some clarification is still required as to precisely which PSCs have been recommended for an RI/FS. Following a review of the Work Plan approved October 23, 1990; the SMP received in this office on February 26, 1991; and the Community Relations Plan (CRP) provided to EPA's RPM during a site visit to NAS Pensacola on February 19-20,

1991; Table 2 was prepared. The Table lists the PSCs recommended for an RI/FS by each of these documents. EPA is concerned at the lack of concurrence between these three documents, two of which have already been finalized. This situation must be remedied.

10. Page 2 of 12 - It is EPA's opinion that the justification for grouping of Operable Units may require reconsideration in some instances. Specifically, the current groupings have apparently not taken into account the information obtained from ongoing RCRA investigations and Corrective Actions at NAS Pensacola. The Work Plan approved October 23, 1990 makes reference only to studies conducted under the NACIP Program, including an Initial Assessment Study, and a two-part Confirmation Study: consisting of a Verification Study followed by a Characterization Study. The information obtained from RCRA investigations and Corrective Actions may prove particularly useful in defining an Operable Unit pertaining to existing groundwater contamination assessment and remediation. EPA feels that sufficient information exists to permit grouping of some PSCs into Operable Units by criteria other than simple geographic proximity.