



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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NAS PENSACOLA

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Ms. Suzanne Sanborn
Remedial Activities Branch
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 10068
Charleston, South Carolina 29411-0068

Re: Site Management Plan (SMP) submitted June 6, 1991
NAS, Pensacola

Dear Ms. Sanborn:

The Environmental Protection Agency (EPA) has completed its review of the most recent draft of the Site Management Plan (SMP) for NAS, Pensacola, received in this office June 10, 1991. Overall, the present SMP represents a great improvement over previous drafts. The format is good and the time frames are generally much improved. We appreciate your consideration and efforts to incorporate each of our comments. However, some revisions are still needed before the SMP can be approved. A revised draft must be resubmitted within 7 days of receipt of this letter.

EPA's comments, presented in the following pages, are divided into two groups. The first group of comments must be addressed in the current redraft of the SMP. The second group must be addressed in preparation of the SMP due September 1, 1991. Many of the comments in the latter group pertain to long-range concerns which may be adequately, and perhaps more effectively, addressed in the upcoming and later SMPs as more data becomes available.

Please feel free to contact me at 404/347-3016 should you have any further questions regarding this matter.

Sincerely yours,

Allison W. Drew, RPM
Department of Defense Remedial Unit
RCRA & Federal Facilities Branch

Enclosure

cc: Ron Joyner, NAS, Pensacola
Eric Nuzie, FDER

EPA COMMENTS ON 6/6/91
SITE MANAGEMENT PLAN FOR
NAVAL AIR STATION - PENSACOLA

COMMENTS WHICH MUST BE ADDRESSED FOR THE CURRENT SMP TO BE APPROVED:

1. Page 2 of 80, Paragraph 2 - The first sentence of this paragraph states that, "twenty-two (22) PSCs are undergoing screening..". The third sentence states that, "screening is underway or planned for nineteen (19) PSCs..". Table 1-1 identifies 18 screening sites. These seeming discrepancies must be resolved. All screening sites must be identified in the *SMP* and tracked in quarterly progress reports.
2. Page 3-4 of 80, Table 1-1 - Appendix A of the FFA requires that an RI/FS be conducted for Sites 1, 2, 3, 9, 11, 15, 17, 22, 26, 27, 29, 30, 31, 32, 33 and 38 through 42. Please make the appropriate corrections to this table.
3. Page 1 of Expedited Schedule - The time allotted for field work, data assessment and report preparation in this schedule (240 + 120 + 90 days) actually exceeds that allotted in the enforcement schedule (360 days). The purpose of the Expedited Schedule is clearly to reduce the time required to complete each task. This situation must be remedied.

COMMENTS WHICH MUST BE ADDRESSED IN THE SMP DUE SEPTEMBER 1, 1991:

1. Page 1 of 80, Section 1. The Basis for a Site Management Plan (SMP) - The second sentence in this section contains an error. The FFA is required by Section 120 (e)(2), not Section 120 (e)(1), of SARA.
2. Page 1 of 80, Section 2.0 OVERALL MANAGEMENT APPROACH - Future versions of the *SMP* should emphasize a more dynamic approach to Remedial Investigation activities. An inflexible multi-phased approach in which each phase of field work is followed by report preparation and review periods adds considerable time to the RI schedule. These time periods can be shortened considerably through continual assessment of the data as it is being collected. See Section 2.0 of the *SMP* for MCLB, Albany for a good example of this approach.
3. Page 5 of 80, footnote - There appears to be an organizational problem here. What does this footnote reference? It appears to be out of context.

4. Page 5-6 of 80, Section 3.0 RATIONALE FOR OPERABLE UNIT SITE GROUPINGS - This section is a useful addition to the SMP and provides a good explanation of the "site-grouping" process. However, further explanation of the investigation prioritization process is needed, since Section 4.3 of the July 1990 Site Management Plan (Ecology and Environment Work Plans) provides little information on this issue. The site grouping process, which emphasizes physical similarities between the sites, is clearly (and appropriately) oriented towards streamlining field investigations and expediting remediation efforts. However, the statement that prioritization of sites is "driven by actual or potential threat posed by the PSC's known or suspected contamination" needs to be expanded upon. Were factors such as:

- i) potential for human exposure/contact
- ii) suspected mobility of potential contaminants
- iii) potential for off-site migration & exposure
- iv) relative threat to groundwater (e.g. suspected date & volume of release) considered?

If this information has been provided in other documents, these references should be provided.

5. Page 7 of 80, Table 1-2 (cont'd) - Some of the information provided on pages 56 and 60 of the SMP should be provided under the heading "Type of Contaminants" for OU#s 11 and 12.
6. Page 9 of 80, Table 1-3 - According to this table, the field investigation/report preparation schedule has been modified from that presented in the work plans approved on October 23, 1990. These original work plans described a minimum two-phase field investigation for each site which could be extended to as many as four phases of investigation if needed to adequately characterize contamination. Table 1-3 indicates that the Phase II investigations will complete the field investigations for all sites, and that the complete results will be presented in the draft RI report. This change is also evident in the schedules provided for individual OUs. EPA strongly approves of this change. However, this revised approach to field investigations needs to be clearly described in an introductory section at the beginning of the SMP, perhaps as an addition to Section 5. OPERATIONAL UNIT SCHEDULING.
7. Page 9 of 80, Table 1-3 - As is evident in this table and in the schedules provided for the individual OUs, the Navy has shortened the schedules leading up to completion of a ROD considerably. As stated in your response #10 to our comments, the schedules now run from 22 to 30 months. EPA commends this commitment to shortening schedules to the

maximum extent possible while maintaining the quality of work and data obtained. However, it has come to our attention in reviewing the Phase I Data Reports for OUs 1-5, that the quality of our review would be greatly improved if these documents were submitted on a staggered schedule. Likewise, future field work would probably also be of better quality if it were conducted on a similarly staggered schedule, particularly since the next phase of field investigations will be the final phase. A two-month offset between the schedules for each OU is recommended.

8. Page 13 of 80, Time Line Schedule for OU #1 - 360 days is excessive for the completion of field work at OU#1 alone. Does this number assume that field work will be ongoing at OUs 1-5 during this time? Unless adequate justification is provided, the schedules for each OU - inclusive of the field work - should be OU-specific. This comment appears applicable to all of the OU schedules included in the present SMP.
9. Page 13 of 80, Time Line Schedule for OU #1 - According to this schedule, preparation of the Draft Feasibility Study (FS) does not begin until after submittal of the draft RI Report. Preparation of the FS should begin during the RI and run concurrently with the latter. In this way, more time could be allotted for the Draft FS, which should be submitted within 3 months of the Draft RI Report. This comment appears applicable to all of the OU schedules included in the present SMP.
10. Page 28 of 80, Description for OU #5 - While the "site-grouping" process described in Section 3.0 of the SMP is good, it needs to be applied at the OU-specific level. A brief rationale for the grouping of these sites as an OU must be included in this description. This comment appears applicable to the schedules for all OUs which include more than one site in the present SMP.
11. Page 60 of 80, Description for OU #12 - The rationale behind the present investigation prioritization must be addressed on a site specific level, either in the general introductory sections of the SMP or as a brief statement in each individual site description. At present, the relatively low priority of some sites, such as the Oak Creek Campground, requires further explanation.
12. Page 1 of Expedited Schedule - The short periods allotted for preparation of documents for the draft through the final ROD may be difficult to obtain if these are being prepared for OUs 1-5 simultaneously. Again, phasing would probably be advantageous and improve the quality of the documents being produced.