



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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ATLANTA, GEORGIA 30365

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NAS PENSACOLA
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OCT 11 1991

4WD-RCRA&FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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: Draft FY 92 Site Management Plan (SMP)
NAS, Pensacola

Dear Ms. Sanborn:

The Environmental Protection Agency (EPA) has completed its review of the draft FY92 Site Management Plan (SMP) for NAS, Pensacola, received in this office on September 6, 1991. Our comments are presented on the following pages. As per Section XXIII.D. of the FFA, a revised draft must be resubmitted within 30 days of receipt of this letter.

Please feel free to contact me at 404/347-3016 should you have any 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
DRAFT FY92 SITE MANAGEMENT PLAN FOR
NAVAL AIR STATION - PENSACOLA

1. Page 2 of 75:

Please make the following changes to the second paragraph on this page:

- (a) Delete the third sentence of this paragraph and replace it with the following text: "The 17 PSCs will not be included or tracked in the SMP unless they have been grouped with Operable Units for investigative and reporting purposes, Each Operable Unit Narrative thus identifies and briefly describes all sites to which the accompanying Operable Unit-specific schedule applies. The schedules are enforceable, however, only for those sites for which an RI/FS has been required.."
- (b) Delete the last two sentences of this paragraph.

2. Page 3 of 75:

This chart should be reorganized to facilitate tracking of the RI/FS process:

Column 1: Group Letter
Column 2: Operable Unit Number
Column 3: Site Number
Column 4: Site Name/Description
Column 5: FFA Requires (RI/FS or screen)
Column 6: Batch Number
Column 7: Type of Contamination (from Table 1-2)
Column 8: Grouping Rationale (e.g. similar contaminant types, geographic proximity, etc.)

3. Page 5 of 75:

Please replace the final sentence of the first paragraph on this page with the following: "The purpose of this approach is to eliminate the need for the development of formal interim data reports. Specifically, the data gaps and the information needed to fill those gaps shall be identified by evaluating the data itself rather than by evaluating a formal data report. The formal report shall be prepared once the nature and extent of contamination have been adequately delineated for the purposes of performing a Baseline Risk Assessment (BRA) and selecting a Remedial Action."

4. Page 6 of 75:

Please modify the second sentence of the first paragraph of Section 3. as follows: "The scheduled work at these OUs is being offset based on relative potential threat, schedule optimization and task management."

5. Page 6 of 75:

Please insert the following two sentences at the end of the first paragraph in Section 3. (i.e. after the listing of the 12 criteria used to generate RI/FS OUs): "These Operable Units may be re-defined as more data is collected and evaluated. Ultimately, an Operable Unit will consist of PSCs and matrices which **require** similar remedial efforts."

6. Page 6 of 75:

Please move the second paragraph of Section 3. (i.e. "Also, the following....as separate deliverables.") to the end of Section 5.

7. Pages 6 thru 9:

Please delete the final sentence on page 6, Table 1-2, and the first sentence on page 9.

8. Page 9 of 75:

Please insert the following phrase at the end of the first sentence in Section 4.: "unless they have been grouped with Operable Units for investigative and reporting purposes.

9. Page 9 of 75:

Regarding the third sentence of Section 4., please replace the phrase "...create additional OUs to address the PSC problem." with the following: "incorporate these PSCs into existing Operable Units, or designate them as new Operable Units, following the criteria listed in Section 3."

10. Page 9 of 75:

Please insert the following text, at the end of Section 5: "Table 1-2 provides a listing, by Operable Unit, of Compliance or Projected due dates for all draft primary documents up through, and including, the Draft Feasibility Study."

Please insert "Table 1-2"*, to contain deliverable dates for the following documents, at the end of Section 5.:

Column 1:	Operable Unit
Column 2:	Draft RI/FS Work Plan (/Phase II Work Plan)
Column 3:	Draft Remedial Investigation (RI) Report and Baseline Risk Assessment (BRA)
Column 4:	Draft Feasibility Study (FS)
Column 5:	Draft Proposed Plan

*

Please note that while future Phase I Interim Data Reports will be accepted for background information purposes, these documents will not be subject to EPA peer review and have therefore not been included in this table.

11. Page 11 of 75:

Please insert a one or two-sentence rationale for the investigative priority of this Operable Unit at the end of the "Description:" paragraph. This rationale may reference such factors as: relative potential for human exposure, potential for off-site migration, magnitude and/or toxicity of suspected contamination, etc.. Additional factors which may have influenced the start date of the RI/FS, such as the date of PSC identification, should also be stated.

12. Pages 11 and 12 of 75:

The "Primary Deliverables" schedule must list the due dates for all items which are to be transmitted in calendar year 1992, as per Section XXIII.A. of the FFA. The "Projected Deliverables" schedule should list all out-year transmittal dates which occur on or after December 31, 1992. Please revise these schedules accordingly. References to past transmittal dates should be deleted, with the exception of approval dates for Primary Documents. These comments are applicable to the Primary and Projected Deliverables schedules for all Operable Units.

The following errata were also detected:

- a) The Site Management Plan and Quarterly Reports are generic documents and should be presented in a separate generic schedule. Other generic documents to be included in this schedule include the Community Relations Plan.
- b) The Draft/Final RI/FS Phase II Work Plan is chronologically out of order. Please check the chronology of this, and all other, Operable Unit schedules.
- c) As stated in Section VIII.C. of the FFA, the Baseline Risk Assessment is a primary document. Please make the necessary corrections to this, and all other, Operable Unit schedules.

13. Page 13 of 80:

The schedule provided here must be Operable Unit-specific. Clearly, the 360-day time period listed for field work and report preparation is Batch- rather than Operable Unit-specific. In those instances where it is impracticable to provide an Operable Unit-specific time period, this should be indicated in the schedule (i.e. footnoted, etc.). This comment is applicable to all of the OU schedules included in the present SMP.

The public notice should be prepared and published in one 15-day period. This comment is applicable to all of the OU schedules included in the present SMP.

Preparation of the Feasibility Study (FS) should begin during the Remedial Investigation (RI) and run concurrently with the latter. This approach will give the Navy more time to prepare the FS, which must be submitted within 3 months of the Draft RI Report. According to the schedule provided in the current SMP for Operable Unit 1, preparation of the Draft Feasibility Study (FS) does not begin until after submittal of the Draft Remedial Investigation (RI) on June 29, 1993. The 60 day period allotted for preparation of the Draft FS is likely to be inadequate. This comment is applicable to all of the OU schedules included in the present SMP.

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. A staggering of these schedules for each Operable Unit would probably be advantageous and improve the quality of the documents being produced.

14. Page 15 of 75:

Please insert the following after the paragraph on PSC 26: "The following Screening Site which will be investigated and reported on concurrently with this Operable Unit include: PSC 12: Scrap Bins." This sentence should be followed by a brief description of the PSC. This comment is applicable to all Operable Units which are being investigated concurrently with one or more screening sites.

15. Page 48 of 75:

Please update this schedule to reflect the receipt-date of EPA/FDER comments on the Draft Work Plan. Also, 385 days of field work on an Operable Unit for which considerable investigation has already been done is clearly excessive. This time period must be shortened substantially.

16. Pages 67 thru 75

The Draft RI/FS Work Plans for Operable Units 15, 16 and 17 are not scheduled for submittal until mid- to late-1992. These submittal dates must be moved up, particularly since these investigations will be quite different in nature from those conducted for other PSCs and they will probably require the services of a different contractor.

17. General Comment, Compliance Schedules:

Roughly the same amount of time has been allotted for field work and RI Report preparation for all 17 Operable Units (i.e. either 360 or 385 days). Consideration must be given to the individual characteristics of each batch of PSCs, so that a unique, "batch-specific" schedule for the duration of field work and draft RI report preparation can be provided in each case.

The grouping of Operable Units into batches for the purpose of streamlining field work and improving cost-effectiveness is understandable. However, the simultaneous investigation of 10 or more PSCs has resulted in RI/FS schedules which are overly lengthy. Serious consideration must be given to regrouping these Operable Units in order to reduce the lengths of RI/FS schedules and demonstrate significant progress toward the clean up of some sites within more reasonable time frames. In short, the current batch schedules place too much emphasis on cost-effectiveness and insufficient emphasis on timely investigation and clean up.

18. Informal Expedited Schedules for Operable Units 1-17:
The allotment of 120 days for data assessment alone is excessive. Data assessment should begin while field work is still in progress and continue through the preliminary stages of Draft RI/FS Report preparation. This 120-day period must be reduced to 45 days for all Expedited Schedules.