

32501.000
03.03.00.0020

N00204.AR.000316
NAS PENSACOLA
5090.3a



UNITED STATES ENVIRONMENTAL PROTECTION
REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JAN 08 1992

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, S.C. 29411-0068

RE: 1992 Site Management Plan (SMP)
NAS, Pensacola, Florida.

Dear Ms. Sanborn:

EPA Region IV has reviewed the most recent version of the 1992 SMP for Naval Air Station (NAS), Pensacola, received in this office on November 18, 1991. EPA is approving the Draft Final SMP with the Navy's acceptance of the enclosed primary comments. The EPA's secondary comments still need to be addressed in order for EPA to approve any subsequent SMPs.

The primary comments involve problems with the document sequences and submittal dates which must be addressed in order for the schedules to be technically correct in accordance with the NCP.

The remaining comments deal with other, equally important issues, many of which involve the overall investigative strategy and schedule implementation at NAS, Pensacola. EPA realizes that some of these issues may require additional discussions with the Navy before a mutually acceptable solution can be reached. We therefore propose that these concerns be discussed at a meeting to be held January 14, 1992, following the Remedial Project Manager's meeting, currently scheduled for January 13, 1992. All of the comments should be resolved no later than March 1, 1992.

If you have any questions regarding this matter, please call me at (404) 347-3016.

Sincerely yours,


Allison W. drew, RPM
RCRA & Federal Facilities Branch
Waste Management Division

cc: Ron Joyner, NAS
Eric Nuzie, FDER

TECHNICAL REVIEW AND COMMENTS
DRAFT FINAL FY92 SITE MANAGEMENT PLAN (SMP)
NAVAL AIR STATION (NAS), PENSACOLA

EPA approval of the FY-92 Site Management Plan (SMP) is contingent upon the Navy's acceptance of the following Primary comments :

1. Page 11:

The Projected Deliverables schedule for OU1 is still out of order. The correct order of transmittal for the documents listed in accordance with the NCP is:

- a) Remedial Investigation/(Baseline) Risk Assessment
- b) Feasibility Study (PS)
- c) Proposed Plan (PP)

[Note: For non-controversial remedial alternatives the Navy should consider development and submittal of the FS and PP simultaneously to save costs and expedite the review and approval process.]

2. Page 11:

The (Baseline) Risk Assessment, as per Section VIII.C.1.d. of the FFA, and as defined in 40 CFR §300.430(d)(4) is a Primary document pertaining to risk in accordance with the NCP whenever it is submitted seperately rather than with the RI Report. Please correct as necessary.

3. Page 12:

The dates provided for submittal, review and revision of the Feasibility Study are clearly incorrect. Please revise these dates in accordance with EPA's previous comment #13 pertaining to scheduling of the FS. This correction is applicable to all Operable Units, as appropriate.

4. Page 69:

All efforts should be made to have the formal start dates for OUs 15-17 moved forward. As is evident from examining the currently-scheduled submittal dates for Draft RI/FS Work Plans, such an action would not preclude a staggered schedule:

<u>OU</u>	<u>Current Draft RI/FS W.P. Schedule</u>
10	June 22, 1991
11-14	(+3 mos. =) September 22, 1991
1-5	(+1 mo. =) October 17, 1991
6-9	(+6 mos. =) April 17, 1992
15-17	(+8 mos. =) December 12, 1992

EPA recommends that the work plans for OUs 15-17 be submitted as soon as possible after submittal of the work plans for OUs 6-9. EPA will provide any assistance necessary to accomplish the acceleration of the current schedule.

5. In any case where the intent of the Federal Facility Agreement is questioned the NCP requirements shall prevail where applicable.

SECONDARY COMMENTS WHICH MUST BE RESOLVED BY MARCH 1, 1992 AND PRIOR TO THE APPROVAL OF SUBSEQUENT SMPs:

1. Page 2, Paragraph 2:

The ninth line of this paragraph should begin: "have been grouped".

2. Page 3, Table 1-1:

The information included in this table should be ordered in such a way that it reflects the RI/FS schedules contained in the rest of the SMP. Specifically, since the batch number reflects the relative time at which the RI/FS will begin for a given PSC, PSCs should be arranged in order of increasing batch number in this table. Since, the RI/FS process is Operable Unit-specific, the OU number should be the second sorting factor, and the PSC number should be the third sorting factor.

A portion of the information corresponding to PSC 14 is offset to the right.

3. Page 6, Paragraph 1:

Please replace the sentence in this paragraph as requested in EPA's comment #3 on the Draft 1992 SMP. Formal Interim data reports shall not be prepared, since these represent an unnecessary delay in the RI process. Decisions as to how the investigation shall proceed will be made through less formal presentation and examination of the data (for example: through the use of brief technical reports updating investigatory progress/results, summary tables & figures, etc.) and/or discussions at project manager's meetings.

4. Page 8:

The table requested in EPA's comment #10 on the Draft SMP will serve a useful purpose and must be included. While it is true that all of the information requested for this table is contained in the SMP, this information is scattered throughout 75 pages of text and tables. The purpose of this table is to consolidate information on significant milestones in the RI/FS process for all PSCs into a single location. In short, the table will facilitate the tracking process.

5. Page 9:

A Generic Schedule must precede the OU-specific schedules. It is redundant to list the Quarterly Report and SMP schedules in each OU schedule, and these documents are not OU-specific. Submittal dates and review/revision schedules for all other generic documents, such as the QAPP, must also be included in this schedule. With regards to the CRP, our records indicate that while a Draft Final version of this document has been submitted to this office, formal approval of the document has not yet been made. EPA anticipates submitting comments on this document to the Navy within the next several weeks.

6. Page 10, Paragraph 1:

Both the grammar and content of the prioritization rationale included here is confusing. EPA suggests the following rewrite: "PSC 1 was identified prior to preparation of the IAS report in 19—. The site was given a very high investigative priority relative to other PSCs identified at this time. This high priority was due to the suspected magnitude and toxicity of contamination, the potential for off-site migration of contaminants via several pathways, and the potential for human exposure."

A similar statement of prioritization rationale should be included for each Operable Unit in the *SMP*. Presumably, this rationale has already been determined. It should therefore not be difficult to include.

7. Page 12:

The following deficiencies were noted:

a) As was stated in our previous comment 13, if it is impracticable to provide an OU-specific time period for field work, this should be indicated in the schedule (i.e. through means of a foot-note, etc.).

Furthermore, if the schedules provided must be batch-rather than OU-specific, why not provide a single schedule, and a listing of primary, secondary and projected deliverables, for each batch of PSCs. In its present form, the *SMP* contains numerous identical schedules which only serve to increase the thickness of the document.

b) The schedule must be expanded to show submittal, review and revision schedules for the proposed plan and the ROD.

Some or all of the above comments are applicable to the schedules for remaining Operable Units.

8. Page 50:

EPA's original comment #15 stands. 385 daya for field work at OU 10 is excessive and must be reduced.

If 45 days is the time needed to prepare and publish the public notice, then this period must overlap with the preparation and review period for the Draft Final Proposed Plan. EPA recommends that work begin on the Public Notice the day after the Draft Final Proposed Plan is submitted for review. This comment is applicable to all Operable Units. Also, two weeks is excessive for preparation of a public notice. Our office can provide additional guidance and assistance on this.

9. General Comment:

EPA understands the Navy's decision to investigate a large number of sites simultaneously (i.e. in Batches). Clearly, this is a significant cost-saving measure which could potentially shorten the overall length of the field investigation by eliminating the delays associated with mobilization/demobilization.

However, the unavoidable result of choosing to investigate a large number of sites simultaneously, is to significantly lengthen the RI/FS process for individual sites. For example, "batching" a PSC believed to consist of a limited area of soil contamination with 7 other sites is likely to increase the time required to complete the RI/FS process for that relatively smaller site at least severalfold.

Clearly, the PSC groupings must be carefully planned if the RI/FS is to be completed in a cost-effective and timely manner for the individual PSC. As was stated in our earlier comment #17, it is EPA's opinion that the current grouping does not adequately address the latter goal. For this reason, the present PSC grouping rationales must be re-examined and justified in greater detail, to determine whether a better balance between these two goals can be achieved.

According to page 7 of the *SMP*, 12 factors were used to establish investigative priorities and PSC groupings. Factors 9 through 12 are primarily concerned with potential threat to human health and the environment and thus pertain more to prioritization. Factors 1 through 8 provide the grouping rationales. These can be restated as follows:

1. Contaminant Type
2. Affected (contaminated) Media
3. Vertical and Lateral Extent of Contamination

These factors will, in turn, determine:

4. Scope/Complexity/Method of Investigation
5. Remedial Action

Clearly, similarities in factors 1-3, and thus 4-5, for individual PSCs, must drive the PSC grouping process. Geographic proximity should be used only as a last resort, if little or no information about factors 1-3 is known. The following are some specific recommendations:

PSCs which are likely to require extensive investigation of several media (such as large landfills), should not be grouped with smaller, high priority PSCs which are likely to require a shorter, less complex, period of investigation.

If several PSCs are likely to display similar contamination of the same media, then these PSCs should be grouped together in anticipation that similar investigatory methods will be employed, and a similar remedial action may be proposed for the entire group in a single ROD. (The present Operable Units 14 (PCB sites) and 4 (Pesticide sites) are good examples of this approach).

If the grouping of a large number of sites is unavoidable, the information and data on these sites must be evaluated as it becomes available to determine whether a subdivision of the group at some point will allow the RI/FS of a portion of the sites to be brought to a more rapid conclusion.

Only after the grouping process is complete, should the prioritization factors be used to determine the order in which group investigations will proceed.

In **summary**, your response to this comment must include the following:

A) A clearly thought out statement of the rationale behind the designation of each Operable Unit. Specifically, an adequate justification for this designation shall include an evaluation of all PSCs included in the Operable Unit with respect to grouping factors 1-3 (and implicitly 4-5) listed above.

B) A clearly thought out statement of the reasons for placing individual OUs in the same batch. A rationale similar to that required in "A)" must be provided as justification for combining groups into batches.

10. General Comment:

The field schedules for batches must be arranged so that the completion of field investigations, and submittal of RI/FS reports for individual Operable Units is staggered, or offset, to the maximum extent possible. A strategy must be developed whereby certain Operable Units are targeted for early completion of the field work. This shall be done to avoid the difficult task of preparing decision documents and holding public comment periods, simultaneously, for numerous Operable Units, except in those cases where it may be workable and expedient to do so.

Furthermore, unless the number of documents submitted simultaneously for review is considerably reduced in the future, EPA may need to extend its review period under the Expedited Schedule.

11. Expedited Schedules:

Regarding the 120 days allotted for data assessment, EPA does not disagree with the amount of time allotted for this task. Rather, we disagree with the fact that, according to these schedules, this task does not begin until after the field work is completed. This lack of overlap is inefficient. Data analysis should begin when the first piece of data is obtained and must be completed no more than 30 days after the last piece of data is received (15 days to validate and 15 days to assess/evaluate). This 30 day period for pure data validation/assessment could be further reduced through overlap with the initial stages of RI/FS report preparation.

Why do the expedited schedules allot 90 days for preparation of the Draft Proposed Plan, while the enforceable schedules allot 60 days?

Preparation of the Draft Record of Decision must begin, and run concurrently with, the first 14 days of the public comment period. Additional guidance on preparation and processing of proposed plans and RODs will be provided under separate correspondence and will be applicable to all NPL sites.