



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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NAS PENSACOLA

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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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: Finalization of RI/FS Work Plan for Operable Unit 10  
(Sites 32, 33 and 35); NAS, Pensacola

Dear Ms. Sanborn:

EPA has completed its review of the Draft Final Group 0 RI/FS Work Plan, resubmitted to this office on February 10, 1992. With two exceptions, the Agency's comments were adequately addressed in this resubmittal. EPA hereby approves the Group 0 RI/FS Work Plan contingent upon acceptable resolution of the the following issues.

- (i) Regarding comment 3: Section 5.1.7 of the work plan states that, "During the walkover survey, rare, threatened and endangered species and their potential habitats will be identified...". In order to adequately evaluate the potential impact of any detected contamination on these receptor organisms, the location of all identified habitats must be provided on the requested map.
- (ii) Regarding comment 13: the proposed investigative schedule is still too long and must be shortened.

These issues must be resolved as follows:

- (i) The revisions pertaining to comment 3 must be incorporated into the work plan. The Navy may resubmit only the affected pages, rather than reissuing the entire document.
- (ii) Regarding shortening of the investigative schedule, the Parties to the Federal Facilities Agreement (FFA) must meet, either in person or via conference call, to negotiate an Expedited Schedule. Following review of the expedited schedule, decision will be made by the Parties as to whether revision of the Enforceable Schedule for Operable Unit 10 is also necessary. All scheduling changes agreed to shall be documented in the Navy's response to our outstanding comments on the 1992 Site Management Plan (SMP), due March 1, 1992, and in the 1993 SMP.

In addition to the preceding issues, EPA wishes to offer the Navy the following recommendations. Due to an oversight in our review process, Section 5.7. Feasibility Study (FS), was inadequately reviewed. Given the current near-final status of this work plan, and the fact that "further details on the specific tasks to be performed as part of the FS will be described in detail after the field work has been completed" (p. 5-31), a thorough review of this portion of the work plan will be performed upon receipt of this later submittal. In the interim, EPA encourages the Navy to utilize the following sources when preparing this submittal:

(i) USEPA guidance document: Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (Interim Final, 1988)

(ii) comments supplied to the Navy on the Feasibility Study portions of the Draft RI/FS Work Plans for Operable Units 11 through 14 (specifically, comment 46).

Please be advised that, in any event, in order for the Feasibility Study to be considered acceptable, it must be completed in accordance with the requirements of the National Contingency Plan (NCP) as described in 40 CFR 300.430(e).

Finally, the Navy has yet to supply EPA with a formal schedule of Navy's anticipated start date for field work at these sites, including the dates and time periods for all events which will precede this start date. Please note that in accordance with the approved 1992 SMP, field work at these sites must commence immediately upon final approval of the RI/FS Work Plan unless this office receives notification otherwise.

Should you have any further questions regarding these matters, please feel free to contact me at 404/347-3016.

Sincerely yours,



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

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