



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

32501.000
03.05.00.0013

APR 03 1992

4WD-RCRA/FF

N00204.AR.000352

NAS PENSACOLA

5090.3a

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Federal Facilities Agreement (FFA), corrected pages 21-23;
NAS, Pensacola

Dear Ms. Sanborn:

In accordance with Section XXXI. of the Federal Facilities Agreement (FFA) for the Naval Air Station (NAS) Pensacola, EPA requests that the following corrections be made to the primary and secondary documents lists included in the copies of this agreement currently held by the parties:

1. Page 21: replace Risk Assessments Report with Baseline Risk Assessment Report

2, Page 22: delete Baseline Risk Assessment

These changes are in accordance with 40 CFR §300.430(d)(4) which states that "the lead agency shall conduct a site-specific baseline risk assessment to characterize the current and potential threats to human health and the environment...". The function of the RI is to provide the information needed to "assess [these] risks ... and to support the development, evaluation and selection of appropriate response alternatives [i.e. the Feasibility Study (FS)]." (40 CFR §300.430(d)(1). Thus, as defined by the NCP, the RI, BRA and FS each comprise major discrete portions of the RI/FS process, and are therefore primary documents.

Corrected versions of the affected pages (21 through 23) are enclosed. Unless you have further questions or concerns regarding these changes, please replace the pages in your copy of the agreement with these corrected pages. Your assistance in this matter is appreciated.

Sincerely yours,

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

2. "Secondary documents" include those reports, plans and studies that are discrete portions of the primary documents and are typically input or feeder documents. Secondary documents are issued by the Navy in draft subject to review and comment by U.S. EPA and FDER. Although the Navy will respond to comments received, the draft secondary documents may be finalized in the context of the corresponding primary documents. A secondary document may be disputed at the time the corresponding draft final primary document is issued.

C. Primary Documents:

1. The Navy shall complete and transmit draft documents of the following primary documents, if such documents are required under the Site Management Plan, to U.S. EPA and FDER for review and comment in accordance with the provisions of this Section. Unless otherwise specified, the documents shall be for a specific operable unit(s).

- a. Site Management Plan
- b. Site Community Relations Plan (CRP)
- c. Remedial Investigation or Feasibility Study (RI/FS) Work Plans
- d. Baseline Risk Assessment Report
- e. Remedial Investigation (RI) Reports
- f. Feasibility Study (FS) Reports
(including Detailed Analysis of Alternatives)
- g. Proposed Remedial Action Plans (PRAP)
- h. Records of Decision (RODs)

- i. Remedial Desian (RD) Reports
(including Desian Plans and
Specifications)
- j. Remedial Action (RA) Work Plans
- k. Final Remediation Reports (including
Notices of Intent to Delete)
- l. Five Year Review Reports
- m. NPL Close-Out Report

2. Only the draft final primary documents identified above shall be subject to dispute resolution. The Navy shall complete and transmit draft primary documents in accordance with the timetable and deadlines established in Section XXIII (Deadlines) of this Agreement.

D. Secondary Documents:

1. The Navy shall complete and transmit draft documents of the following secondary documents, if such documents are required under the Site Management Plan, to U.S. EPA and FDER for review and comment in accordance with the provisions of this Section. Unless otherwise specified, the documents shall be for specific operable unit(s). Secondary documents include:

- a. Preliminary Characterization Summary
Reports
- b. Site Health and Safety Plan
- c. Site Sampling and Analysis Plan
(including Quality Assurance Project

Plan (OAPP) and Field Sampling Plan).

- d. Site Quarterly Proaress Reports
- e. Treatability Study Reports
- f. Remedial Action (RA) Proaress Reports
- g. Remedial Design (RD) Implementation Plan
- h. Remedial Pre-Design Reports
- i. Remedial Action (RA) Post-Construction Reports

2. Although U.S. EPA and FDER may comment on the draft documents for the secondary documents listed above, such documents shall not be subject to dispute resolution except as provided by Paragraph B hereof. Target dates shall be established for the completion and transmission of draft secondary documents pursuant to Section XXIII (Deadlines) of this Agreement.

E. Meetings of the Project Managers on Development of Documents:

The Project Managers shall confer monthly except as otherwise agreed by the Parties, to review and discuss the progress of work being performed at the Site on the primary and secondary documents. Prior to preparing any draft document described in Paragraphs C and D above, the Project Managers shall discuss the data to be reported in an effort to reach a common understanding with respect to the results to be presented in the draft document to the maximum extent practicable.

F. Identification and Determination of Potential
ARARs: