



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 5090.3a

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 3036532501.001
03.01.01.0013

SEP 0 1

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Conditional approval of Draft Final RI/FS Work Plans for OUs 1-5;
NAS Pensacola, Florida
BPA Site ID No.: FL 9170024567

Dear Ms. Martin:

The Environmental Protection Agency (EPA) has completed its review of the Draft Final RI/FS Work Plan⁸ for Operable Units (OUs) 1 through 5. EPA shall consider these work plans conditionally approved upon our receipt of insert pages which provide the following corrections to the work plan text.

1. Pursuant to 40 CFR §300.430(d)(4), the data generated in the RI must be used to "conduct a site-specific baseline risk assessment to characterize the current and potential threats to human health and the environment". Thus, while the scope of the ecological component of the BRA may vary from one Operable Unit (OU) to the next, the assessment of ecological risk for each OU is not optional. Since it is uncertain at this point whether biota sampling or other data collection efforts will be needed to complete the BRA for OUs 1-5, the following text must be deleted from each of the five work plans:

"Biota sampling also will not be conducted during Phase II..
However, basewide biota sampling will be conducted in conjunction with the investigation of Operable Units (OUs) 15, 16 and 17...respectively."

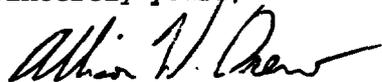
In the event that this, or other, sampling is needed to complete the BRA for OUs 1-5, this sampling must be performed in accordance with the paragraph which was inserted in each Draft Final Work Plan to perform additional work during Phase II.

2. The only method number listed for Total Organic Halogens in the SQAPPs for these work plans is SW 9020. The apparent discrepancy between this listing and the Navy's response to our comment 49b. for the OU 13 RI/FS Work Plan must be clarified.

Conditional approval is granted with the mutual understanding and agreement of all three FFA parties that the work plans for OUs 1-5 will be re-evaluated (through re-submittal, review and approval of the OU-specific Sampling and Analysis Plans (SAPs)) prior to their implementation to assure the timeliness and the quality of the work ultimately performed.

Should you have any questions or concerns regarding these matters, please contact me at 404/347-3016.

Sincerely yours,



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

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