



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IV  
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ATLANTA, GEORGIA 30365

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NAS PENSACOLA  
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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Linda Martin  
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 93 Site Management Plan (SMP)  
Naval Air Station (NAS) Pensacola, Florida

Dear Ms. Martin:

The Environmental Protection Agency (EPA) has completed its review of the draft FY93 Site Management Plan (SMP) for the Naval Air Station (NAS) Pensacola, Florida which was received in this office on September 8, 1992. 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 your receipt of this letter.

Please feel free to contact me at 404/347-3016 should you have any questions or if I can be of additional assistance.

Sincerely yours,

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

Enclosure

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

**EPA COMMENTS ON  
THE DRAFT FY93 SITE MANAGEMENT PLAN FOR  
NAVAL AIR STATION (NAS) PENSACOLA  
PENSACOLA, FLORIDA**

1. Page 1, paragraph 1:

As stated in the *SMP* text, "The intent of the plan is to provide: (1) an action deemed necessary to mitigate any immediate threat to human health [or] the environment...". The *SMP* must therefore include, at a minimum, (i) an identification and brief description of all planned or proposed removal activities, (ii) the planned/actual submittal dates for the corresponding "Removal Action Plans", (iii) approval dates for those plans where appropriate, and (iv) the planned submittal dates for all Removal Action Reports. EPA is currently aware of two such actions at NAS Pensacola. A Contingent Removal Action Plan to address contaminated soils at Sites 21 and 36 which may be encountered during military construction project MILCON P-100 was approved by EPA on June 8, 1992. The Navy has also proposed to conduct a Removal Action on the contaminated soils at Site 39, which would presumably be completed before the RI/FS field work for this site begins. Additional candidates for Removal Actions were presented in EPA's comments on the Phase II RI/FS Work Plans for Batch 2 sites, and it is anticipated that decisions regarding these actions will be made at future RPM meetings. For information purposes, all proposed Removal Actions agreed to by the parties must be included in the *SMP*.

2. Page 1, paragraph 1, final sentence:

The text must be updated to indicate that the FY93 *SMP* represents the second annual update of this document.

3. Page 2, paragraph 1, final sentence:

Does 21 still accurately reflect the number of UST sites/tanks being investigated? Please update/correct the text as needed.

4. Page 2, paragraph 2, second sentence:

Based on Phase I investigatory results for Batch 1 sites, EPA directed the Navy to upgrade all screening sites in this Batch to RI/FS sites. Thus, Sites 12, 13, 14 and 24 are now RI/FS sites. This decision is documented in the cover letter dated September 25, 1991, in which EPA transmitted comments to the Navy on the Batch 1 Interim Data Reports for screening sites. Also, the parties agreed at the recent RPM/Scoping meeting held September 9-10, 1992 in Pensacola, Florida, to upgrade screening Site 36: IWTW Sewer Line to RI/FS status. Site 25: Radium Spill Area was also presented as a potential candidate for RI/FS status. However, EPA has agreed to postpone a final decision regarding this site pending receipt and evaluation of additional information and data. Please make the appropriate corrections to the text both here and throughout the *SMP*.

5. Page 2, paragraph 2, ninth line:

This line should begin with the phrase "have been grouped",

6. Page 2, paragraph 2:

Does this paragraph accurately list the number and identity of all known UST sites at NAS Pensacola? Please update this information as needed. Also, while it would be unnecessarily time-consuming to include lengthy descriptions

and schedules for these sites in the **SMP**, since they are already being addressed under a separate program, certain basic information on these sites should be included in the **SMP** in order to facilitate early recognition of potential overlap and conflict between **UST** and **CERCLA** sites. Specifically, EPA recommends that a table be added to the **SMP** which includes the following information: (i) **UST site number and name**, (ii) **work plan status (e.g. "approved 8/1/92")**, (iii) **report status (e.g. "anticipated submittal date: 2/1/93")**, (iv) **other pertinent information (e.g. "site was recommended for transfer to CERCLA program on 10/1/92")**. At some point, it would also be helpful if the Navy could provide a map which illustrates the locations of all **UST** sites, though this does not necessarily need to be included in the **SMP**.

7. Page 2, paragraph 3:

The dates in this paragraph need to be adjusted to reflect the fact that this is the **FY93 SMP** (e.g. the "upcoming year" is 1992-93).

8. Pages 3-4, Table 1-1:

A) This table must be updated to reflect the **RI/FS** status of sites 12, 13, 14, 24 and 36.

B) EPA recommends the following changes to the current site "categories". In the interests of resolving the associated contractual difficulties, EPA recommends that a meeting be held between the Parties' contractual staffs and the project managers sometime prior to finalization of the **SMP**.

1. Given the potential for similar remedial approaches (and thus, similarities in the content of the associated decision documents), both landfills (i.e. Sites 1 and 11) should be kept on the same schedule. This approach will greatly facilitate the **RI/FS process**. It should also not be overly difficult from a field or logistics standpoint, since the planned "**SAP Finalization**" and "**Field Work Start-dates** are identical for these two sites.
2. In our comments on the Batch 2 Phase II **RI/FS Work Plans**, EPA states that Sites 29 and 34 should be combined with Site 36. The contamination identified at Sites 9 and 10 may also be associated with Site 36. Thus, at least 3, and ideally all 5, of these sites will be investigated simultaneously. In addition, Site 36 is an extremely large site. Simultaneous investigation and report preparation for these 5 sites, together with the other 3 sites in "Category 3", is therefore likely to overload the system and delay completion of the **RI/FS** for the latter 3 sites. Category 3 must be revised to include 2 separate schedules ("subcategories"). Specifically, it is unlikely that the field work for Sites 2, 30 and 38 will require the full 180 days allotted to complete. **RI/FS Report** preparation for these sites should thus begin immediately upon completion of the field work and data validation tasks. Ideally, the draft reports for Sites 2, 30 and 38 would then be submitted sometime between the July 14, 1993 due date for "**Category 2**" sites and the current October 11, 1993 due date for "**Category 3**" sites.

9. Pages 7-8, Section 3:

This section must be updated to include a discussion of the recent changes agreed to at RPM meetings regarding eite groupings and reprioritizations.

10. Page 9, Section 6:

Please delete the reference to Gantt charts, mince these are no longer included in the SMP.

11. Page 13, schedule for OU 10:

According to this schedule, the FS for OU 10 will be submitted on February 4, 1993, together with the RI report. To date, the only document related to conducting or preparing the FS is the brief section contained in the RI/FS Work Plan. In order to maintain this schedule, it is essential that the Navy initiate plans to complete any activities associated with the FS (field or otherwise) now. The SMP schedule must also be revised to include the proposed submittal dates for any FS-related documents (e.g. Treatability Study Work Plans, Treatability Study Reports, etc.).

12. Page 16, paragraph 2:

Please delete all portions of this paragraph which refer to Site 31, since this RI/FS eite is no longer being investigated with Sites 25 and 27.

13. Page 17, 1993 Primary Deliverables:

Please delete the first reference to submittal of the FY93 SMP, since it is repetitive and out of order.

14. Page 18, Site 39: Oak Grove Campground Area:

This eite is targeted for a Removal-Action which will likely to address much of the contamination associated with the site and simplify subsequent investigatory efforts. For these reasons, Site 39 would be an excellent candidate for an expedited ROD. Please provide an expedited, non-enforceable schedule for this eite, as an attachment to the SMP, which would permit finalization of the ROD by late 1993.

15. Pages 28-30:

The document prepared by E&E entitled: "Data Summary and Preliminary Scoping for Ecological Risk Assessment Work Plans" contains concise, well-written description of each of OUs 15, 16 and 17. Please replace the corresponding SMP text with the opening paragraphs of Sections 3.1 (p. 3-1), 3.2 (p. 3-22) and 3.3 (p. 3-30) from E&E's document.

16. Page 31:

The RI/FS schedules for OUs 15-17 must be reviaied to reflect the changes agreed to at the recent RPM meeting (i.e. submittal of 2 technical memos and revised submittal date for the Draft RI/FS Work Plan).

17. Page 33, paragraph 3:

Please omit the reference to UST Site 23 from this paragraph.

18. Page 34, paragraph 4:

Please omit this paragraph deecribing UST Site 23 from the SMP text.

19. Page 44, 1993 Primary & Secondary Deliverables:

These lists correctly include the submittal dates for the Phase II Draft Final RI/FS Work Plan and supporting documents. These documents must be included in the "deliverables" lists for all Batch 2 RI/FS sites.

20. General Comments regarding all schedules:

A) As agreed to by the previous SOUTHDIV RPM and James Malone, Chief, Remedial Activities Branch, if the Baseline Risk Assessment is not submitted with the Remedial Investigation Report, then it shall be considered a primary document. Please make the appropriate corrections to all "Primary Deliverables" lists.

B) Please include the due dates for the Draft SAP and the Draft Final SAP under the "1993 Secondary Deliverables" list for each site where appropriate.

C) EPA commends the Navy for preparation of the aggressive schedules included in this draft of the FY93 SMP. However, based on previous experience, it may be difficult to maintain these schedules, particularly once field work and document preparation for multiple "Categories" is underway. In order to assure that all Parties involved will be able to maintain the final SMP schedules, EPA recommends that the amount of offset between each "Category" be increased slightly. Specifically, please revise the schedules so that the RI/FS Reports for each of Categories 2, 3, 5, 6 and 7 are submitted 2 months apart, beginning with the current July 14, 1993 due date for Category 2.

D) In the interests of expediting the review/finalization process for the numerous decision documents which are required for each Operable Unit, EPA proposes the following modifications/ammendments to the review and response periods included in the Federal Facilities Agreement:

1. Reduce the EPA and FDER review times for all Proposed Plans and RODs from 90 to 45 days.

2. Reduce the Navy's "Response to Comment" period from 60 days to 30 days.

E) 45 days to prepare and publish the public notice is excessive. These 2 tasks should be completed in one 21-day period.