

TO: NASP Meeting Files

**FROM:** Tier I Partnering Team

DATE: August 5, 1994

**RE:** Identification and Resolution of CERCLA, RCRA Regulatory Issues Relevant to BRAC activities at Chevalier Field

Base Realignment and Closure (BRAC) plans will **require** complete reconstruction of the Chevalier Field **area**. **Since hazardous** wastes have **been managed in** this **area**, all pre-construction plans must include plans for adequately **addressing** pertinent environmental regulatory issues. **Specifically**, the requirements of CERCLA, RCRA, **and the UST** Regulatory programs must be met at both state and federal levels.

Under the Federal Facilities Agreement, the Tier **1 team** is **tasked with** ensuring that all actual and potential releases of hazardous waste **are** adequately addressed through appropriate **response** actions in accordance with CERCLA and RCRA **regulatory** programs. Tier **1 recognizes** that in order to achieve **this** goal in a complete **and** timely manner, they must **coordinate** their efforts with the efforts of other regulatory programs, such **as those pertaining to** underground storage tanks and the treatment, storage, and disposal of RCRA **hazardous** wastes. This process ensures that all program requirements are met, and reduces the number of duplicate efforts.

In order to achieve the above goal, Tier **1** must select appropriate **response actions** for all "IR" sites in the Chevalier Field area. Due to short BRAC timetables, **all** response actions for soils are currently being addressed through conservative removal actions, aimed at alleviating the **need** for future remedial actions.

In order for BRAC activities to continue **on** schedule, **all** pertinent environmental regulatory issues must be resolved by September **7, 1994**. Therefore, due to **this** severe time constraint, Tier **2** is empowering Tier **1** to accomplish the following additional **tasks on** or before **this** deadline:

1. Resolve the following specific CERCLA/RCRA issues:
  - abandonment procedures for **the** Industrial Waste Collection **and** Transfer System
  - disposal of Chevalier Field **concrete**
  - **delisting** of Chevalier Field soils
2. Compile and evaluate all available **information pertinent to the** above Tier **2** issues, and Tier 1's **normal** issues. If any UST information is **needed** in order to make decisions regarding **these** issues, that information **will also be** compiled.
3. Identify all non-Tier **1** stakeholders which may provide pertinent or **useful** input

to decisions **on** the above issues, **and** involve them **in the process as** appropriate. Tier 2 **can** assist Tier 1 in identifying **these** stakeholders.

4. Acknowledge when the authority for **making** a **final** regulatory decision resides with a stakeholder. Involve **him/her** accordingly when **making** the required decisions. (In particular, the authority for **all** issues **regarding** the treatment, storage, and disposal of **hazardous** wastes lies with **Bill** Kellenberger, FDEP District **Office**).
5. **Based** on **all** the above information obtained **from** the **sources identified** in 2-4 above, compile a position **paper** which **presents** proposed solutions **to both** Tier 2's issues, **and** Tier 1's **normal** issues.
6. If time limitations prevent tier 1 from obtaining information which is critical to **making** a decision **on one of these issues**, Tier 1 will formulate the best decision possible based **on** the available information **and qualify** this decision **by stating** the regulatory risks inherent **in accepting** this decision.
7. Tier 2 empowers Tier 1 to make the necessary decisions **regarding** the above stated issues. Tier 2 acknowledges the priority of this project **and** agrees **to** provide the **necessary resources** required **to** make a decision.
8. Tier 1 **accepts** the responsibilities **as** outlined above.

Tier 2 agrees with **and supports** the above statements **and** goals.

**NAS PENSACOLA TIER I: ATTEND.**

DATE: 8-3-94

NAME	REPRESENTING	PHONE	FAX	INITIALS
Allison Humphris	EPA Region IV	404-347-3016	404-347-5205	AMH
Henry Beiro	EnSafe/Allen & Hoshall	901-372-7962	901-372-8930	H/B
David Clowes	FDEP	904-488-3935	904-922-4939	DMC
Brian Caldwell	EnSafe/Allen & Hoshall	904-479-4595	904-479-9120	(BC)
Ron Joyner	NAS Pensacola	904-452-3900	904-452-2150	<del>                    </del>
Bill Hill	NAVY	803-743-0324	803-743-0465	BH
Bill Gates	NAVY	803-743-0360	803-743-0465	BG
Clayt Schroeder	Management Edge	207-934-1604		JCS
Dick Handraha	" "	813-397-6155	813-397-6255	DAH
GAINES SMITH	Bechtel ENUR	615 220-2531	615 220-2748	AS
Allison Danner	E/A&H	901-372-7962	901-372-8930	AD
Tricia Scurfield	E/A&H	901-372-7962	901-372-8930	TS
Ken PALKA	NAVY	803-743-0637	803-743-0465	KJP
Joe McCauley	navy	803/743-0500	" "	JM

# NAS PENSACOLA TIER I: ATTENDANCE LIST

DATE: 8-4-94

NAME	REPRESENTING	PHONE	FAX	INITIALS
Allison Humphris	EPA Region IV	404-347-3016	404-347-5205	ABH
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Brian Caldwell	EnSafe/Allen & Hoshall	904-479-4595	904-479-9120	BC
Ron Joyner	NAS Pensacola	904-452-3900	904-452-2150	RJ
Bill Hill	NAVY	803-743-0324	803-743-0465	BH
Bill Gates	NAVY	803-743-0360	803-743-0465	BG
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# NAS PENSACOLA TIER I: ATTENDANCE LIST

DATE: 8-5-94

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Allison Humphris	EPA Region IV	404-347-3016	404-347-5205	AH
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Brian Caldwell	EnSafe/Allen & Hoshall	904-479-4595	904-479-9120	BC
Ron Joyner	NAS Pensacola	904-452-3900	904-452-2150	RJ
Bill Hill	NAVY	803-743-0324	803-743-0465	BH
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Ken PALKA	NAVY	803-743-0637	0465	KP