



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION  
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ATLANTA, GEORGIA

OPTIONAL FORM 90 (7-90)

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NAS PENSACOLA

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## MEMORANDUM

DATE: AUG 09 1994

TO: NAS Pensacola Files

FROM: Allison D. Humphris, RPM *ADH 8/9/94*

RE: List & Current Status of Informal Disputes and  
RI/FS Work Plan Approvals  
Naval Air Station (NAS) Pensacola

1. FY93 Site Management Plan (SMP): EPA invoked dispute on December 17, 1992, due to Navy's failure to submit an acceptable SMP. Issues: status of screening sites 12, 13, 14, 24 and 36 (upgrade to RI etatus?); Navy failure to recognize Baseline Risk Assessment as primary document. Dispute issues were resolved in a meeting held February 3-4, 1993 and documented in subsequent correspondence and in a revised FY93 SMP submitted April 16, 1993.

2. FY94 Site Management Plan (SMP): EPA approved the FY94 SMP in December 1993. Early in 1994, the Navy informed the Parties that in order to meet BRAC program requirements, the schedules had to be modified. Numerous subsequent meetings were held in an effort to devise workable schedules which were acceptable to all Parties. The Navy formally submitted an extension request (revised SMP) in April 1994. Following BPA and FDEP comment, a second revised SMP was submitted and ultimately approved by the Parties in July 1994.

3. Sites ③, 7, ⑨, 10, 25, ②⑦, ②⑨, ③①, 34 & 36 (former E&E Groups F, G, J, K, M & N) (Note: only sites 3, 9, 27, 29 and 31 are RI sites): Due to the receipt of unsatisfactory draft final work plans, EPA invoked informal dispute in January 1993 to keep the work plans from going final. Navy requested specific list of problematic comments/issues which BPA provided in February 1993. Meetings and discussions were held in an effort to resolve these issues. Due to the large number of issues and ongoing workload, the period of dispute was extended by the Parties several times. In a letter dated March 30, 1993, the Navy recommended that a majority of the issues be resolved through finalization of the Comprehensive Sampling and Analysis Plan (CSAP). The remaining issues could be resolved through approval of site-specific SAPs. EPA agreed with this proposal.

A. **CSAP:** the Navy has submitted, and EPA and FDEP have reviewed, **several revisions** of the CSAP. The most recent revision was received in this office on July 11, 1994. Based on recent meetings and discussions, BPA is hopeful that this most recent version can be approved by the regulatory agencies.

B. **Sites 25 E 27:** EPA reviewed and approved SAPs (& Work Plane) for these sites in correspondence dated August 1993.

*action required* → C. **Sites ③, ⑨, 10, ②⑨ E 34:** ERA transmitted review comments to the Navy on these SAPs in May 1994. In order to expedite the field start for these sites, many of which were impacting BRAC activities, EPA stated that the Navy need not revise and resubmit the SAPs (secondary documents), provided that the Navy understood that these comments must be adequately addressed in the appropriate RI Reports (primary documents) in order for EPA to consider those Reports for approval.

D. **Site 7:** In accordance with the approved FY94 SMP schedules, field work for this site is scheduled to commence in February 1995. The Draft SAP will be submitted to EPA for review in January 1995.

E. **Site 31:** Was merged with Site 30, due to close proximity, See status description under 4B.

F. **Site 36:** This site originally consisted of the entire Industrial Waste Sewer Line. During the FY93 SMP dispute resolution, the Parties agreed to divide the line into 3 portions. Those portions of the line which were adjacent to sites 30 and 38 were to be investigated as part of those sites. Site 36 now consists only of the remaining central portion of the line. The Navy submitted amended SAPs for sites 30 and 38 in the summer of 1993. EPA transmitted comments on these addendums in September 1993. The Parties reached verbal agreement on these SAP amendments during a Fall 1993 RPM Meeting. The Navy submitted a "partial" Site 36 SAP, to investigate those portions of the site which were impacting BRAC, in May 1994. EPA commented on that SAP in July 1994. The "remainder" of the site 36 SAP has not yet been submitted.

4. **Other Outstanding Issues:** Between August and November 1992, EPA transmitted correspondence to the Navy conditionally approving the RI/FS Work Plan for Operable Units 1 through 5 (sites 1, 2, 11, 15, 26, 30) and 11 through 14 (sites 17, 22, 38, 39). The current status of the Work Plans/SAPs for each of these sites is:

*action required* → A. **Sites ① & ⑪:** In August 1993, EPA approved SAP/W.P., with

the exception of the proposed addendums, and transmitted comments on the addendums. Field Work was initiated and has since been completed.

*action required* → B. Sites 30 & 38: In September 1993, EPA approved SAP/W.P., with the exception of the proposed addendums, and transmitted comments on the addendums. The Parties reached verbal agreement on these SAP amendments during a Fall 1993 RPM Meeting. Field Work was initiated and has since been completed.

C. Sites 2 & 39: EPA approved the SAP/W.P. in August 1993 correspondence.

D. Sites 15 & 17: The SAP was initially submitted and reviewed in January 1994. It will be revised and resubmitted in September 1994. Field work is scheduled to commence in November 1994.

*action required* → E. site 26: EPA received an initial SAP in May 1994, and commented in July 1994. Field work is currently scheduled to commence in September 1994.

F. Site 22: The SAP was initially submitted and reviewed in January 1994. It will be revised and resubmitted in January 1995. Field work is scheduled to commence in February 1995.

5. OU 10 RI Report: The Navy submitted the Draft Final RI Report for Operable Unit 10: Industrial Waste Treatment Plant, in December 1993. Upon review, EPA found that virtually none of the Agency's comments on the Baseline Risk Assessment had been addressed, and the contractor had collected most surface soil samples from 0-2 feet instead of 0-1 feet. EPA therefore invoked dispute to keep the Report from going final, and provided the Navy with a complete listing of Agency comments within 2-3 weeks of invoking dispute. EPA also offered to collect the necessary surface soil samples in order to expedite this process, and the Navy accepted this offer. EPA provided the results/report for the additional surface soil samples in June 1994. The Parties had previously agreed that the Navy could take 60 days from receipt of EPA's date to complete revision of, and resubmit, the Draft Final RI. The revised Draft Final RI Report for OU 10 is due in this office on August 15, 1994.

'O' = RI site