



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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

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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
P.O. Box 10068
Charleston, S.C. 29411-0068

RE: Community Relations Plan Revision
NAS Pensacola, Florida.

Dear Ms. Sanborn:

Pursuant to conversations between the Remedial Project Managers, it is EPA's understanding that the Navy is seeking to modify the approved Community Relations Plan (CRP) in accordance with Section VIII.J.1. of the Federal Facilities Agreement (FFA) for NAS Pensacola.

EPA concurs with the Navy's decision to update the CRP, since significant changes relevant to the RI/FS process have occurred since this primary document was finalized on November 1, 1990. In order to assist the Navy in updating the document efficiently, EPA has conducted a review of the approved CRP. The enclosed comments are aimed at updating and correcting the factual content of the work plan as well as communicating the information contained in the plan to the public more clearly.

In addition to the enclosed specific comments, EPA wishes to emphasize that the primary function of the CRP is to provide NAS Pensacola with a "blueprint" for actively involving the public in the RI/FS process. This proactive approach should be emphasized throughout the text of the revised document. Since community acceptance is one of the nine criteria which must be addressed prior to finalization of any Record of Decision (ROD) for the facility, it is imperative that the community be updated on a regular basis and provided with clear opportunities to voice any issues and concerns that they may have throughout the RI/FS process. The Navy, in turn, must strive to actively respond to these concerns. Fact sheets, press releases, public forums and meetings, and any other suitable tools should be prepared or scheduled whenever useful or appropriate.

EPA looks forward to receiving the revised CRP for NAS Pensacola at your earliest convenience. Should you have any further questions regarding this matter, please call me at (404) 347-3016.

Sincerely yours,



Allison W. Drew, RPM
Federal Facilities Branch
Office of RCRA & Federal Facilities
Waste Management Division

cc: Ron Joyner, NAS
Eric Nuzie, FDER

Ag50114

TECHNICAL REVIEW AND COMMENTS
COMMUNITY RELATIONS PLAN
NAVAL AIR STATION (NAS) PENSACOLA
PENSACOLA, FLORIDA

1. **Title Page:**
Please revise the document title. EPA prefers all plans involving **community** relations to be called the **Community Relations Plan (CRP)** in accordance with the statute.
2. **Page 1:**
Please update the list of **sites** requiring an **RI/FS** as per Appendix A of the **FFA**. This **correction must** be made throughout the text as needed.
3. **Page 2, Paragraph 2**
Reword this paragraph as follows: "...Public involvement begins prior to the **Remedial Investigation** and continues.... These fact sheets will be **mailed** to local homes, **businesses**, and **community leaders**..."
4. **Page 2, Paragraph 1:**
Delete the final sentence of this paragraph.
6. **Page 2, paragraph 2:**
Reword this paragraph as follows: "...the Navy, EPA and Florida Department of **Environmental Regulation**. Under this **Agreement**, all testing and cleanup is done with the **approval** and oversight **of**"
6. **Pages 2 through 7, Section 2.2**
This section must be shortened. The following **comments** are provided.
 - a. **Page 3, Paragraph 1:**
Please defer all individual **site** descriptions to **Section 2.3**.
 - b. **Page 6, Paragraph 2**
Please list all **previous site investigations** in bullet form. Other **significant** items and **events which should be included in this list are:**
 - RCRA Facility Assessment (RFA):
 - RCRA/HSWA Permit:
 - RCRA Closure & Post-Closure **Permits:**
 - NPL Site Listing:
 - c. **Page 6, Paragraph 3:**
Please update the contents of this paragraph as needed.

The phrase "During the Preliminary Assessment phase of the IR process..." should begin a new paragraph.

Please update Table 2.1 as needed. Also, move the reference to this **table** to the beginning of the **paragraph**.

The phrase **"There are 17 sites..."** should **begin** a new paragraph.
 - d **Page 7, Paragraph 1:**
The steps of the **RI/FS process, including those activities** which solicit community involvement and response, would be more easily viewed in bullet **form** rather than **text/narrative** form. Please

revise accordingly.

Navy responses to comments and the ROD must be submitted to both EPA and FDER

Move the reference to Table 2-2 to the beginning of the paragraph.

7. Page 7 through 16, Section 2.3

This section should begin with a general or introductory subsection which briefly describes basic physical conditions at NAS Pensacola. Brief descriptions of the facility's geology, hydrogeology, topography, surface water and drainage pathways, water usage and significant ecological conditions should be included. These descriptions should be aimed at providing the public with a basic knowledge of the facility which they can use to evaluate the more specific information provided for individual sites.

The site-specific descriptions can be significantly abbreviated. To the maximum extent practicable, the site descriptive information should be moved to Tables 2-1 and 2-2 and deleted from the text. Regarding the inclusion of investigative results, as more data becomes available it will become increasingly difficult to keep this section updated. Recommendation is made that the authors either:

1. Refer the reader to available reports for information on investigative results (e.g. include a bibliography as an appendix), and/or
2. Summarize the results in a simpler, more readily updated, format. For example, prepare a table which lists contaminants, by general class (e.g. VOCs, BN/Aa, metals) detected in each media (e.g. surface water, sediment, soil, shallow groundwater contamination, deep groundwater contamination) on a site-by-site basis. Definitions of contaminant classes, media types and other terms unfamiliar to the public should be included in Appendix B Glossary.

a Page 17, Paragraph 2:

The first half of this paragraph, up to and including the sentence: "NAS Whiting Field is located in Santa Rosa County." should be moved to Section 2.2 Site Background.

9. Pages 18-19, Section 3.2

This section must be updated as new community concerns become apparent.

10. Page 19:

Please correct the grammatical errors on this page.

11. Page 20, Paragraph :

Please include the schedules and/or specific criteria which will be used to determine when an update of the CRP is needed.

12. Page 20, Objective 1, Method of Accomplishment 3

Please modify the last sentence as follows: "...periodic fact sheets and releases to local media and all citizens on the mailing list." NAS Pensacola should continue to use the mailing list as a vehicle for keeping the public updated and informed.

13. Page 22, Section 6.1.1:

A public meeting should be held when the RI/FS Work Plan is finalized.

14. Pages 22-28, Section 5.1.2:

Please make the following corrections:

REVISIONS

Bullet 1: Modify text to **state**: "...with local **officials** and citizens..".

Bullet 8 The "comprehensive **Fact Sheet**" referred to here is actually **the Proposed Plan**.

Bullet 4 A **46 day** comment period will be required to meet both RCRA and CERCLA requirements.

Bullet 6 Please **note that** all activities (including public meetings and workshops) held during the public comment period must be transcribed. For this reason, the facility may wish to hold **activities requiring extensive** transcription outside of the public comment period whenever possible.

Bullet 6: Modify the **text** to **state**: "...with local **officials**, community leaders and citizens.."

16. Page 23, Section 5.1.3:

Bullet 1: Modify the **text** to **state**: "...with local officials and the community.."

Bullet 5: delete (repeats Section 6.1.2, Bullet 3).

16. Page 24:

Insert Section 5.1.5: Removal Actions. Please refer to 40 CFR 300.415(m) of the NCP for further information on community relations requirements for removal actions.

17. Tables 2-1 and 2-2:

These tables *should* either be included in the body of the text or designated as Appendices.

18. Appendix A:

Please make the following corrections:

Remedial Investigation Complete:

Bullet 1: Replace with: "Prepare/release Proposed Plan"

Bullet 2 A **46 day** comment period will be required to meet both RCRA and CERCLA requirements.

Prior to Initiation of Remedial Design:

Bullet 1: delete

Bullet 8 delete

Insert Bullet at beginning: **Prepare** an RD Fact Sheet

19. Appendix B:

COMMENT PERIOD: Revise the final sentence to read: "A **minimum 6-week** comment period is held to *allow* community members to review the **Administrative Record** and review and comment on the Proposed Plan."

COST-EFFECTIVE ALTERNATIVE: correct the grammatical errors in this paragraph.

ENDANGERMENT ASSESSMENT: retitle this paragraph "BASELINE RISK ASSESSMENT".

ENGINEERING EVALUATION/COST ANALYSIS (EE/CA): An analysis of removal alternatives for a site. It is similar in form and content to an abbreviated Feasibility Study (FS).

EXPLANATION OF DIFFERENCES either **clarify**, in layman's terms, what "Section 106" and "Section 122" are, or reword this definition in such a way that use of these terms is not required.

INCINERATION: revise the final phrase to read: "hazardous or non-hazardous waste."

INFORMATION REPOSITORY: delete the word "current"

MONITORING WELL: delete the word "special"

800-456-1234

OPERABLE UNIT: the ~~text~~ in ~~this~~ paragraph is describing an ~~Interim Remedial Action~~. An **Operable Unit** is defined as a discrete action which comprises an incremental step toward ~~comprehensively addressing site problems~~. **This** discrete portion of a remedial response manages ~~migration, or eliminates or mitigates~~ a release, threat of a release, or pathway of exposure.

PROPOSED PLAN: revise the *opening* phrase to **read:** "A public ~~participation~~ requirement of **SARA** in which the lead agency summarizes for the public..."

RECORD OF COMMUNICATION Please correct this definition.

RESPONSE ACTION As defined by Section 101(25) of CERCLA, means remove, removal, remedy or remedial action, **including** enforcement activities related thereto.

RESPONSIVENESS SUMMARY: revise the **first** sentence of this paragraph to **read:** "A summary of *oral and* written public comments **received** by the lead agency during a comment period on **key** documents, and the responses to these comments prepared by the lead agency."

SUPERFUND: Please **replace** this definition with the following: "The "trust fund" established by the Comprehensive **Environmental** Response, Compensation and **Liability Act** (CERCLA) which can be **drawn** upon to plan and conduct cleanups of **past hazardous waste disposal** sites, and **current releases** or threats of releases of non-petroleum **products**. Superfund is often divided into **removal, remedial and enforcement** components."

SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA): please replace this definition with the following: "The public law enacted on **October 17, 1986** to reauthorize the funding **provisions**, and to amend the authorities and requirements of CERCLA and associated laws. **Section 120** of SARA requires ~~that all Federal Facilities~~ "be subject to and comply with, this Act in the same manner and to the **same extent...as** any nongovernmental entity..."

TRUST FUND: please omit this definition.

20.

Appendix C:

FEDERAL, STATE AND LOCAL OFFICIALS: please update as needed.

ENVIRONMENTAL PROTECTION AGENCY:

1. ~~Replace~~ Pat Tobin with
Hagan Thompson
Public Affairs Office
2. Replace **Beverly Mosely** with
Shirley Jones
Community Relations Advisor
3. ~~Please~~ add the following individual to the ~~list~~ of EPA contacts:
Denise Bland
Technical Assistance Grant (TAG) Coordinator
404/347-2234

Also, include a **definition of the TAG** program in Appendix B Glossary. **Section 117.(e)** of the **Statute** contains some information on this program.

4. The current Remedial **Project Manager** is Allison Drew

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NATURAL RESOURCE TRUSTEES ,ATSDR: please include the names and addresses of these individuals.

Please include business phone numbers for all individuals listed in PART A