



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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NAS PENSACOLA
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JUL 08 1992

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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
Charleston, South Carolina 29411-0068

Re: Agency review of "Immediate Removal Action Contingency Plan"
NAS Pensacola, Florida

Dear Ms. Martin:

The U.S. Environmental Protection Agency (EPA) has completed its review of the draft "Immediate Removal Action Contingency Plan", received in this office on June 18, 1992. In general, the document provides an adequate plan for dealing with any contamination encountered in the course of construction associated with Military Construction Project MILCON P-100, which will occur within the boundaries of screening sites 21 and 36 at NAS Pensacola, Florida. EPA's only comment on this document pertains to the health and safety training requirements for workers involved in the project. Pursuant to OSHA 29 CFR **\$1910.120(a)(1)(i)** and OSHA 29 CFR **\$1910.120(a)(2)(ii)** any cleanup work on a regulated hazardous waste site must conform with OSHA training requirements. Since these include the 40 hour health and safety training course, all personnel working within the designated AOC boundaries must have completed this training. Contingent upon satisfactory incorporation of this requirement into the plan (i.e. appropriate revision to Section 4.1.2), EPA shall consider the "Immediate Removal Action Contingency Plan" approved.

In addition, EPA requests that the Navy notify EPA in advance of: (i) the initiation of any field or removal activities associated with this construction project and (ii) all community relations activities associated with this removal action.

Finally, EPA reminds the Navy that, per 40 CFR §300.415 (c), "Removal actions shall, to the extent practicable, contribute to the efficient performance of any anticipated long-term remedial action with respect to the release concerned." Movement of contaminated soils within the designated Areas of Concern (AOCs) should comply with this requirement.

Please contact me at 404/347-3016 should you have further questions or concerns regarding these matters.

Sincerely yours,



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

cc: Ron Joyner, NAS Pensacola
Eric Nuzie, FDER