



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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AUG 28 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  
P.O. Box 10068  
Charleston, S.C. 29411-0068

RE: Schedule for completion of Interim ROD at Operable Unit 10;  
NAS Pensacola, Florida

Dear Ms. Martin:

At the June 16-17, 1992 Remedial Project Manager's (RPM) meeting, the parties agreed to complete an Interim Record of Decision (ROD) for Operable Unit (OU) 10 (Industrial Wastewater Treatment Plant and associated sites). This decision was based on the fact that considerable data and information already exists for this OU, and that a remedy (pump and treat) has already been selected and implemented under RCRA post-closure Permit No. HF17-170951. The Environmental Protection Agency (EPA) agreed to submit a draft Remedial Investigation (RI) Report to the parties for review within sixty (60) days of the RPM meeting, or by August 15, 1992. The Navy, in turn, agreed to prepare the Draft Feasibility Study (FS) Report. The parties further agreed to follow a review and comment schedule similar to the generic expedited schedules contained in the approved FY92 Site Management Plan (SMP).

The purpose of this letter is to present a revised schedule for completing the Interim ROD and associated decision documents for OU 10 (see Attachment 1). Following additional discussion among the parties regarding the enclosed schedule as necessary, the final schedule should be included in the FP93 Site Management Plan (SMP), due September 1, 1992.

The most significant change which EPA would like to propose to the agreed-to schedule is to omit preparation of a formal RI/FS Report. The primary function of this Interim ROD is to formalize under CERCLA the decision to implement pump and treat as a remedy for groundwater contamination at OU 10. The Part B permit application and associated reports should provide adequate documentation of the groundwater contamination detected thus far, as well as the justification for the pump and treat system currently in operation. Furthermore, EPA anticipates that an RI/FS Report which adequately documents the full extent of groundwater and soil contamination for OU 10 will be prepared by the Navy following completion of the upcoming round of field work. It would thus appear duplicative and unnecessarily time-consuming to

prepare a full RI/FS report at this time. Rather, preparation of a Proposed Plan and ROD should provide adequate support for the remedial action decision under CERCLA. As stated in the following excerpt from the March 8, 1990 Federal Register: "...in cases where the relevant data can be summarized briefly and the alternatives are few and **straightforward**, it may be adequate and **more** appropriate to document this supporting information in the proposed plan that **is** issued for public **comment**."

Furthermore, given the shortened schedule which will result from deletion of the RI/FS Report, EPA proposes to take some additional time to prepare a Draft Proposed Plan. Specifically, EPA would like to submit a draft Proposed Plan to the parties sixty (60) days from our receipt of the data for OU 10 in electronic format. Given our receipt date of August 4, 1992 for this information, EPA will transmit a draft of the Proposed Plan to the parties by October 3, 1992. Following receipt of comments from the parties, EPA will prepare the draft final and final versions of the Proposed Plan in accordance with the schedule provided in Attachment 1. In turn, EPA proposes that the Navy take the lead in developing the Interim ROD for OU 10. In accordance with the attached schedule, EPA proposes that preparation of the draft ROD begin immediately upon completion of the parties' review of the Draft Proposed Plan. The Draft ROD should be submitted to the parties for review within sixty (60) days of this preparation start date.

Please review the attached schedule and provide your concurrence or comments as appropriate. If you have any questions regarding this matter, please call me at (404) 347-3016.

Sincerely yours,



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

cc: Ron Joyner, NAS Pensacola  
Eric Nuzie, FDER

Enclosure

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INTERIM ROD FOR OU 10  
 CHRONOLOGICAL EVENT SCHEDULE  
 NAVAL AIR STATION (NAS) PENSACOLA

TASK NAME	EXPEDITED DUE DATE	ENFORCEABLE DUE DATE
EPA transmit Draft Proposed Plan (PP)	03-Oct-92	N/A
Navy, FDER transmit review of Draft PP	24-Oct-92	N/A
EPA transmit Draft Final Proposed Plan	23-Nov-92	N/A
Navy, FDER transmit review of Draft Final PP	07-Dec-92	N/A
Navy transmit Draft Record of Decision (ROD) Proposed Plan Finalized	08-Dec-92	02-Jan-93
Navy publish Public Notice	14-Dec-92	N/A
EPA, FDER transmit review of Draft ROD	28-Dec-92	23-Jan-93
Navy respond to comments on Draft ROD	29-Dec-92	02-Apr-93
Navy transmit Draft Final ROD	N/A	01-Jun-93
Public Meeting	19-Jan-93	31-Jul-93
Public Comment Period Ends	22-Jan-93	14-Feb-93
Navy transmit Final ROD w/ Respons. Summary	11-Feb-93	09-Mar-93
	26-Feb-93	30-Aug-93

INTERIM ROD FOR OU 10  
 EXPEDITED SCHEDULE  
 NAVAL AIR STATION (NAS) PENSACOLA

TASK NAME	START	END	DURATION (days)
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Proposed Plan			
Prepare/submit Draft	04-Aug-92	03-Oct-92	60
FDER,NAVY review	03-Oct-92	24-Oct-92	21
Prepare/submit Draft Final	24-Oct-92	23-Nov-92	30
FDER,Navy review	23-Nov-92	07-Dec-92	14
Proposed Plan Finalized	07-Dec-92	14-Dec-92	7
Public Comment			
Prepare Public Notice	14-Dec-92	28-Dec-92	14
Publish Public Notice		28-Dec-92	1
Public Comment Period	28-Dec-92	11-Feb-93	45
Public Meeting		22-Jan-93	1
Responsiveness Summary	11-Feb-93	26-Feb-93	15
Record of Decision			
Prepare/submit Draft	24-Oct-92	08-Dec-92	45
EPA,FDER review	08-Dec-92	29-Dec-92	21
Prepare/submit Draft Final	29-Dec-92	19-Jan-93	21
Final ROD ( - Resp. Summary)	19-Jan-93	09-Feb-93	21

INTERIM ROD FOR OU 10  
 ENFORCEABLE SCHEDULE  
 NAVAL AIR STATION (NAS) PENSACOLA

TASK NAME	START	END	DURATION (days)
<b>Public Comment</b>			
Prepare Public Notice	02-Jan-93	23-Jan-93	21
Publish Public Notice		23-Jan-93	1
Public Comment Period	23-Jan-93	09-Mar-93	45
Public Meeting		14-Feb-93	1
Responsiveness Summary	09-Mar-93	08-Apr-93	30
<b>Record of Decision</b>			
Prepare/submit Draft	24-Oct-92	02-Jan-93	70
EPA, FDER review	02-Jan-93	02-Apr-93	90
Navy Respond to Comments	02-Apr-93	01-Jun-93	60
Prepare/submit Draft Final	01-Jun-93	31-Jul-93	60
Final ROD w/ Respons. Summary	31-Jul-93	30-Aug-93	30