



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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ATLANTA, GEORGIA 30365

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NAS PENSACOLA

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JUN 10 1994

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Attn: Mr. Bill Hill - Code 1851
Southern Division
NAVFACENGCOM
P.O. Box 190010
North Charleston, South Carolina 29419-9010

SUBJ: 3 Planned Removal Actions for Fiscal Year (FY)94;
NAS Pensacola, Florida
EPA Site ID No.: FL 9170024567

Dear Mr. Hill:

The Environmental Protection Agency (EPA) has completed its review of the following draft documents for the Naval Air Station (NAS) Pensacola:

Immediate Removal Action Work Plan, Site 30, Wetland 5A
Immediate Removal Action Work Plan; Site 32; Wetland 80
Immediate Removal Action Work Plan, Site 39

Our comments are enclosed. Provided that our comments are adequately addressed, EPA concurs with, and will support, the Navy's plans to conduct these three removal actions in Fiscal Year (FY) 94. EPA is encouraged at the proactive efforts which the Navy is taking to initiate cleanup activities at **NAS Pensacola**.

In general, it is critical that all actions conducted at a National Priorities List (NPL) site, such as **NAS Pensacola**, are completed in accordance with National Contingency Plan (NCP) requirements. Appropriate record files and community relations efforts will protect the Navy against future questions regarding the appropriateness and integrity of any given action. In the case of removal actions, it is particularly important that appropriate type of removal action (e.g. time critical, non-time critical) be specified and justified, and that the corresponding community relations activities be completed. As the lead federal agency with removal authority at this facility, it is the responsibility of the Navy to ensure that each removal action is appropriately-identified, -and that all associated requirements under the NCP are met.

Please contact me at (404) 347-3016 if you have any questions or wish to discuss these issues further.

Sincerely Yours,



Allison D. Humphris
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

cc: Ron Joyner, **NAS**, Pensacola
Eric Nuzie, FDEP
Brian Caldwell, Ensafe/Allen & Hoshall

TECHNICAL REVIEW AND COMMENT
REMOVAL ACTION PLANS FOR
SITE 30, WETLAND NO. 5A
SITE 32, WETLAND NO. 80
SITE 39: OAK GROVE CAMPGROUND
NAVAL AIR STATION (NAS), PENSACOLA
PENSACOLA, FLORIDA

GENERAL COMMENTS:

1. Introduction:

The present documents are more commonly titled "Removal Action Plans". However, the exact documentation requirements (e.g. document titles, contents) will depend on the type of removal action planned (i.e. emergency, time-critical or non time-critical). For instance, if a time-critical removal is planned, this document may satisfy the requirements of an "Action Memorandum". Specific community relations requirements must also be met for each type of removal (40 CFR Section 300.415(m)). EPA recommends that the introductory section of this document specify and justify the type of removal action planned, briefly summarize the statutory requirements (documentation, community relation) for that type of removal action, and retitle the document accordingly.

As the lead agency with removal authority, it is the responsibility of the Navy to determine whether and what type of removal action is appropriate in each case (see 40 CFR Section 300.415(b)) and to assure that all NCP requirements associated with the removal process (documentation, procedural, etc.) are met. Numerous EPA guidance documents are available for the Navy to consult in making this determination, including:

Action Memorandum Guidance (December 1990) (EPA/540/P-90/004)

Guidance on the Consideration of ARARs During Removal Actions (September, 1991) (EPA/540/P-91/001)

Guidance On Conducting Non-Time-Critical Removal Actions Under CERCLA (August 1993) (EPA/540-R-93-057)

2. All three planned removal actions appear to be in accordance with 40 CFR Section 300.415(c), which states: "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." As is generally indicated in these plans, all appropriate and useful information collected during the removals (e.g. confirmatory sampling results) should be incorporated into the appropriate primary documents to support the subsequent RI/FS and RD/RA processes.

SPECIFIC COMMENTS:

SITE 30, WETLAND NO. 5A:

1. Page 1-13, Paragraph 3:

"The wetland's hydrology appears to be controlled by two active beaver dams." It is EPA's understanding that a major water line leak which discharged into this wetland was recently detected and repaired by the Navy. Please revise the text, and other pertinent portions of the document (including procedures to be followed in conducting the removal) to include this new information on wetland hydrology which has recently become available.

2. Pages 2-4 through 2-6, Sections 2.1.3 through 2.1.4:

Given the recent water line repair, does the Navy still anticipate the need for wetland draining and/or the construction of a road to the waste-receiving structure?

3. Page 2-8, Section 2.2:

It is strongly recommended that numerous photographs be taken and sketches made of the iron structure, its base and all associated piping found. While the primary purpose of this plan is the safe removal of the structure, a major secondary purpose of the work should be to try to discern the nature and use of this device. This information may prove to be the best available to the team for determining waste disposal practices in this part of the facility.

4. Page 2-13, Section 2.3.2:

Caution must be used in screening the surrounding sediments with an OVA. The methane content of these sediments may be expected to be quite high. Some other field test may be more useful, and not as susceptible to false positives.

5. Page 4-4, Section 4.2.2:

The Petit Ponar dredge may be attempted. It is recommended, however, that hand augers be kept in reserve. There is a strong possibility that the dredge will not operate properly in the heavily-vegetated sediments. Push tubes may also yield acceptable samples.

6. General Comment:

EPA recommends that the Natural Resource Trustees be kept informed of this removal action and of the associated procedures which may be of concern to them.

SITE 32, WETLAND NO. 80:

1. General Comment:

The general purpose of the proposed removal action needs to be clarified. According to the document title, this removal action plan addresses contamination in Wetland t80 at Site 32. However,

according to the text, the purpose of this plan is to address contamination identified at the former Wastewater Treatment Plant (specifically, the former sludge drying beds, the Imhoff tank and the chlorine contact chamber). The WTP is located within "potential wetland 80...[an] area which [will not be] confirmed as a wetland until it can be evaluated according to protocol presented in the 1987 Corps of Engineers Wetlands Delineation Manual." (p. 5) Will the proposed removal action address the "potential" wetland in any way, shape or form? If Wetland 80 is identified as a "confirmed" wetland, will this determination affect the removal action in any way? EPA recommends that the Natural Resource Trustees be kept informed of this removal action as appropriate.

SITE 39, OAK GROVE CAMPGROUND:

(no specific comments)