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NAS JACKSONVILLE
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON PROPOSED SCHEDULE OF EVENTS AT NAS JACKSONVILLE FL
11/19/1993
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

CC: F. Bragdon
W. Britton
file (orig)
P. Redfern

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 19, 1993

RECEIVED 12/1/93

CERTFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joel Murphy
Code 1853
Southern Division Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Dear Mr. Joel:

Department personnel have completed the review of the Proposed Schedule of Events for NAS Jacksonville. I have enclosed a memorandum addressed to me from Mr. Jorge R. Caspary. It documents our comments on the referenced schedules. We agree with your October 28, 1993 letter requesting a meeting in Tallahasee to discuss the proposed schedules. Please notify me or Mr. Caspary of an available date at your earliest convenience so arrangements can be made.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

Eric S. Nuzie

Eric S. Nuzie
Federal Facilities Coordinator

Enclosure

cc: Jorge R. Caspary
James Hudson, EPA-Atlanta
Kevin Gartland, NAS Jacksonville
Philip Georgariou, ABB-Jacksonville
Peter Redfern, ABB-Jacksonville

Printed on recycled paper.

Memorandum

Florida Department of
Environmental Protection

TO: Eric S. Nuzie, Federal Facilities Coordinator
Bureau of Waste Cleanup

THROUGH: Dr. James J. Crane, PG Administrator
Technical Review Section JJC

FROM: Jorge R. Caspary, Remedial Project Manager
Technical Review Section J.R.C.

DATE: November 17, 1993

SUBJECT: Review of Proposed Schedules for NAS Jacksonville.
NAS Jacksonville.

I have reviewed the subject document and submit these comments for the Navy's consideration. I also suggest the three parties to the Federal Facilities Agreement hold a meeting to discuss this memorandum's proposed schedules.

GENERAL COMMENT

While the schedules presented by the Navy have improved from the 1993 Site Management Plan, they still can be vastly improved. While numerous meetings with the Navy have resulted in a strong spirit of cooperation amongst the three parties to the FFA, the Department feels that this spirit of cooperation should be carried over in the schedules presented for this NPL facility. As such, the Department has closely reviewed the schedules presented by the Navy and presents them on a Operable Unit basis.

Operable Unit 1 (OU-1) Interim Remedial Action

The schedules proposed by the Navy are acceptable and should be implemented as soon as possible.

Operable Unit 2 (OU-2) Interim Remedial Action at PSCs 2, 41, and 43

The main concern resides in the amount of time it takes for the implementation of the Proposed Plan. Instead, the Department proposes the following alternative schedule of events.

* Focused Field Work done by	18 Nov. 93
* Tech. Memo preparation ends	22 Dec. 93
* Agency Reviews Tech. Memo by	25 Jan. 94
# Navy awards RA Contract & Site Visit by	28 Feb. 94
* **FEDP and EPA meet with Navy to discuss any comments on TM. Contractors must be present** .	15 Feb. 94
# RAC Visit by	15 Mar 94
# RAC reviews TM by	28 Feb 93
# Finalize Perf. reqmt. for TM by	05 Mar 94
* RAC Develops IRA WP	05 Apr 94
* Agency Reviews IRA WP by	05 May 94
* Navy responds to IRA WP comments by	05 Jun 94
* RAC finalizes WP by	30 Jun 94
* Award RAC Implementation by	30 Aug 94
Implementation of the IRA WP by	30 Sep 94

Total savings over schedules presented: 120 days

Note: The above schedule presents previously discussed and agreed review times and streamlined contracting timelines. As stated before, the Department is committed to an expedient review of documents regarding Focused FS and IRAs. The schedule assumes a 30-day review time for regulatory agencies review and a 60-day award of contracts for RAC site visits and Work Plan implementation. Moreover, the schedule assumes a working-type of meeting with Navy and its contractors regarding review of documents. Please see the schedules on Comments on TM.

Operable Unit 2 (OU-2) Interim Remedial Action PSCs 3 and 42

The main concern resides in the amount of time it takes for the implementation of the Proposed Plan. Instead, the Department proposes the following alternative schedule of events.

* Focused Field Work done by	21 Mar 94
* Tech. Memo preparation ends	21 Apr 94
* Agency Reviews Tech. Memo by	25 May 94
# Navy awards RA Contract & Site Visit by	28 May 94
*** FEDP and EPA meet with Navy to discuss any comments on TM. Contractors must be present .**	15 Jun 94
# RAC Visit by	15 Jun 94
# RAC reviews TM by	30 Jun 94
# Finalize Perf. reqmt. for TM by	15 Jul 94
* RAC Develops IRA WP	30 Jul 94
* Agency Reviews IRA WP by	30 Aug 94
* Navy responds to IRA WP comments by	30 Sep 94
* RAC finalizes WP by	30 Oct 94
* Award RAC Implementation by	15 Jan 95
Implementation of the IRA WP by	30 Jan 95

Total savings over schedules presented: 120 days

Note: The above schedule presents previously discussed and agreed review times and streamlined contracting timelines. As stated before, the Department is committed to an expedient review of documents regarding Focused FS and IRAs. The schedule assumes a 30-day review time for regulatory agencies review and a 60-day award of contracts for RAC site visits and Work Plan implementation. Moreover, the schedule assumes a working-type of meeting with Navy and its contractors regarding review of documents. Please see the schedules on Comments on TM.

Operable Unit 3 (OU-3 Interim Remedial Action

The main concern resides in the amount of time it takes for the implementation of the Proposed Plan. Instead, the Department proposes the following alternative schedule of events.

* Focused Field Work done by	17 Oct 94
* Tech. Memo preparation ends	17 Nov 94
* Agency Reviews Tech. Memo by	17 Dec 94
# Navy awards RA Contract & Site Visit by	17 Jan 95
*** FEDP and EPA meet with Navy to discuss any comments on TM. Contractors must be present .**	30 Jan 95
# RAC Visit by	30 Jan 95
# RAC reviews TM by	15 Feb 95
# Finalize Perf. reqmt. for TM by	01 Mar 95
* RAC Develops IRA WP	01 Apr 95
* Agency Reviews IRA WP by	01 May 95
* Navy responds to IRA WP comments by	01 Jun 95
* RAC finalizes WP by	01 Jul 95
* Award RAC Implementation by	01 Sep 95
Implementation of the IRA WP by	15 Oct 95

Total savings over schedules presented : 60 days

Note: The above schedule presents previously discussed and agreed review times and streamlined contracting timelines. As stated before, the Department is committed to an expedient review of documents regarding Focused FS and IRAs. The schedule assumes a 30-day review time for regulatory agencies review and a 60-day award of contracts for RAC site visits and Work Plan implementation. Moreover, the schedule assumes a working-type of meeting with Navy and its contractors regarding review of documents. Please see the schedules on Comments on TM.

Tasks and Submittals For Operable Unit 1 in the Site Management Plan

The schedules proposed for Operable Unit 1 need major revisions. The Department is specially concerned that the amount of time (13 months) requested for the Treatability Study is simply too excessive. While long-term treatability studies may be needed to demonstrate state-of-the art remedial technologies at sites deemed difficult to remediate with available technologies, this is simply not the case at Operable Unit 1. The Department encourages the Navy to substantially reduce the time it plans to perform this type of study and to submit the Draft Feasibility Study for OU-1 no later than December 1994.

Tasks and Submittals For Operable Unit 2 in the Site Management Plan

The schedules proposed for Operable Unit 2 need major revisions. The amount of time (16 months) requested to "Work RI Tasks" is simply too excessive. The Department questions the Navy's proposal to submit the Draft Baseline Risk Assessment (BLRA) **1 year before the Draft RI is submitted.** Ideally, both reports should be submitted together because the RI findings support the conclusions reached in the BLRA. Likewise, the Department encourages the Navy to substantially reduce the time it plans to "Work RI Tasks" and to submit the Draft RI no later than December 1994.

The amount of time (13 months) requested for the Treatability Study is simply too excessive. While long-term treatability studies may be needed to demonstrate state-of-the art remedial technologies at sites deemed difficult to remediate with available technologies, this is simply not the case at Operable Unit 2. The Department encourages the Navy to substantially reduce the time it plans to perform this type of study and to submit the Draft Feasibility Study for OU-2 no later than January 1995.

Tasks and Submittals For Operable Unit 3 in the Site Management Plan

The schedules proposed for Operable Unit 3 need major revisions. The Department is specially concerned with the amount of time (15 months) elapsed between the end of the validated RI field work and the submittal of the Draft RI report. Likewise, the amount of time (18 months) needed to "perform the FS" also needs to be revised. Moreover, the amount of time (9 months) requested to implement the RI Field Work is simply too excessive. The Navy should consider that the Department has already approved a comprehensive preliminary scope of work designed to reduce the amount of time for the RI field work and subsequent steps. As an alternative to the schedules presented, the Department proposes the following alternative schedule of events.

Scoping Field Work Ends by	8 Oct 93
Data Validated by	7 Dec 93
Agency Review Data Report by	31 Jan 94
Data Report Meeting by	4 Feb 94
Navy develops rough RI Work Plan by	4 Apr 94
Draft RI WP sent to agencies by	10 Apr 94
Agency Review Draft RI Work Plan by	15 Jun 94
Draft RI WP working meeting w/ all parties by	30 Jun 94
Navy prepares Draft Final RI WP by	30 Aug 94
Draft Final RI WP goes Final by	30 Sep 94
Award Work RI Field Work	05 Oct 94
FW Mobilization	05 Nov 94
Field Work ends by	05 Apr 95
Data Validated by	05 Jun 95
Transmit Draft NM report by	05 Aug 95
Transmit Draft RI/BLRA by	05 Dec 95
Agency reviews Draft RI/BLRA by	05 Feb 95
Meeting w Navy and contractors	15 Feb 95
Navy issues Draft Final RI/BLRA	15 Apr 95
Award Work Treatability Study by	30 Sep 94
Navy prepares TT Work Plans by	30 Nov 94
Navy generates Draft TT WP	30 Jan 95
Agencies review Draft TT WP by	15 Feb 95
Agencies meet w/Navy and contractors by	28 Feb 95
Navy issues Draft Final TT WP by	30 Mar 95
Award TT Study by	30 May 95
Perform TTS (it ends by)	30 Oct 95
Submit Draft TT report by	30 Dec 95
Agency review by	28 Feb 96
Working meeting w/ Navy and contractors by	15 Mar 96
Navy issues Final TT report and conclusions by	15 May 96

Tasks and Submittals For Operable Unit 3 - Cont'd

Award Work Feasibility Study by	30 Oct 94
Navy submits Draft FS by	30 Sep 95
Agencies review FS by	30 Nov 95
Meet with Navy and its contractors by	30 Dec 95
Navy issues Draft Final FS by	28 Feb 96