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NS MAYPORT
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LETTER REQUESTING SCHEDULE FOR PHASED RESOURCE CONSERVATION AND
RECOVERY ACT FACILITY INVESTIGATION REPORT SUBMISSIONS TO BE APPROVED
BY U S EPA REGION IV NS MAYPORT FL
6/20/1991
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

NAVSTA Mayport Administrative Record
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Captain J. B. Mitchell, Jr.
Commanding Officer
U.S. Naval Air Station Mayport
P.O. Box 265
Mayport, Florida 32228

RE: SWMU Prioritization and Corrective Action Management Plan
NAS Mayport, Florida

Dear Captain Mitchell:

The Navy is currently finalizing a workplan, to be approved by EPA, for the investigation of each SWMU and AOC at NAS Mayport. Following the approval of the workplan including the schedule, the Navy is to perform all the work at once followed by a phased (RFI) report of the findings.

Due to the magnitude of this permit requirement, EPA recommends that the Navy present to EPA a schedule for phased RFI report submission and request its acceptance. This schedule should be included as an appendix or section within the RFI Workplan.

The HSWA Permit issued for NAS Mayport has provisions that address schedule changes. Condition II.G.7. Schedules of Compliance, states, "The results of all plans and reports shall be submitted in accordance with the approved schedule (in the RFI Workplan). Extensions of the due date for submittals may be granted by the Regional Administrator based on the Permittee's demonstration that sufficient justification for the extension exists."

EPA recommends that the schedule be presented as a "Corrective Action Management Plan" to include the following:

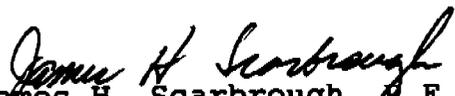
- A. The SWMUs and AOCs gathered into "groups" based on proximity to one another and/or media affected.
- B. A prioritization of SWMUs and AOCs from highest to lowest ranking using associated risk to human health and environment as the scale. Within this ranking the reasoning behind the selection should be addressed to give justification for each site.
- C. Submittal dates for RFI reports.

In addition to the current sites under investigation, the EPA is to be kept informed of any releases or SWMUs which are discovered at any time on the facility in accordance with Condition I.D.16. Other Information, Condition II.A.2. Applicability, and Condition II.B.1. RCRA Facility Assessment (RFA).

In the future all field work and laboratory procedures performed by the Navy or its contractors for NAS Mayport must comply (Condition I.D.9.a) with EPA Region IV Standard Operating Procedure Quality Assurance Manuals (SOPQAM). The SOPQAM for field procedures is dated February 1991, and the SOPQAM for laboratory procedures is dated September 1990. Any planned deviation from EPA Region IV SOPQAM must be justified in writing and be approved by EPA. By not following the Region IV SOPQAMs, NAS Mayport would be in violation of their permit.

Please call Mr. Carl R. Froede Jr. of my staff at (404) 347-3016 with any questions concerning these comments.

Sincerely yours,


James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division

cc: Mr. Satish Kastury, FDER
Mr. Richard Teddar, FDER
Mr. Eric Nuzie, FDER
Mr. James B. Malone, Jr., SODIVNAVFACENGCOM
Mr Jim Reid, SODIVNAVFACENGCOM