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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, N00204.AR.000192

REGION IV

NAS PENSACOLA

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

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FEB 12 1991

4WD-RCRA&FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. G. C. Bradley, Head
Remedial Activities Branch
Department of the Navy - Southern Division
Naval Facilities Engineering Command
1255 Eagle Drive
P.O. Box 10068
Charleston, South Carolina 29411-0068

Re: Draft Final Site Management Plan
NAS Pensacola
Pensacola, Florida

Dear Mr. Bradley:

The Environmental Protection Agency (EPA) has reviewed the Draft Final Site Management Plan (SMP) which was received in our office January 24, 1991. The cover letter dated January 22, 1991, states the SMP was revised based on Florida DER comments and the comments raised in a meeting among EPA and representatives of the Naval Facilities Engineering Command which was held to discuss the SMP's for other naval installations. The cover letter does not indicate that the SMP was revised in accordance with the EPA comments on the SMP which were transmitted to you via certified mail on December 17, 1990. Although the revised SMP addressed some of the EPA comments, EPA is very concerned that these comments were apparently disregarded in the preparation of the Draft Final SMP.

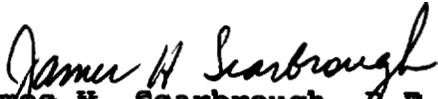
EPA intends to work diligently to continue to provide comments and assistance in a more timely manner than that given in the Federal Facilities Agreement. Please let me know if I or my staff can assist you in meeting these requirements in a more timely fashion. The formal compliance schedule will be the schedule in the SMP (subject to penalties). However, EPA would like to establish an Expedited Review and Document Development schedule which represents the best efforts of EPA, FDER and the Navy in achieving expedited response actions at the effected NPL sites.

Enclosed are EPA's comments on the Draft Final SMP. The comments are divided into two parts. The first part are those comments which were raised in EPA's December 17, 1990, review comments that were not addressed in the Draft Final SMP. Comments in the second part are those which were identified in the most recent review of the Draft Final of the SMP.

Section XXIII.D. of the Federal Facility Agreement (FFA) requires that Dispute Resolution be invoked if the SMP is not finalized by February 25, 1991 (thirty days from receipt). EPA will invoke dispute resolution if the SMP is not revised accordingly and submitted within the required time-frame.

If there are any questions regarding the enclosed comments, please contact Ms. Michelle M. Glenn, of my staff, at (404) 347-3016.

Sincerely,


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

Enclosures

cc: Eric Nuzie, FDER
Ron Joyner, NAS Pensacola
Mr. James Malone, SOUTHNAVFACENGCOM

EPA COMMENTS ON
DRAFT FINAL SITE MANAGEMENT PLAN FOR
NAVAL AIR STATION - PENSACOLA

Part I - Deficiencies remaining from the Draft Final SMP

1. NAS Pensacola is reminded again to title documents consistent with the consultation review process under Section VIII of the FFA. The initial submittal of a primary document must be titled "Draft".
2. I would suggest like to suggest the narrative portion of the SMP be modeled after the Draft Final SMP provided to EPA for the Jacksonville Naval Air Station (Jacksonville, FL). Overall, the narrative of the SMP prepared for NAS Jacksonville comes very close to what was anticipated in an SMP.

Part II - Deficiencies identified in the revised SMP

1. An opening paragraph of the SMP should be dedicated to a narrative of the major activities completed and scheduled for the current calendar year. This should include an identification of all approved primary documents and completed secondary documents. This narrative will serve to summarize the yearly progress and current calendar year projected activities.
2. EPA concurs with the deferral of units 19, 20, 23 and 37 to the State Underground Storage Tank program provided these units are covered under an appropriate enforcement mechanism. The SMP should identify how these hazardous substance releases are addressed under other environmental remediation authorities (e.g., Navy UST Agreement).
3. Page 3 of 13 - The "Group" designation supplied here appears to be redundant. Does it serve a different purpose than the Operable Unit designation? If not, you may want to remove the "Group" designation to prevent confusion.
4. Page 3 of 13 - The "Batch" designation appears to be specific to NAS Pensacola. This designation is unnecessary to meet the requirements of the SMP and may be confusing when the "Batches" become staggered during to site specific scheduling differences.

5. Page 3 of 13 - Batch 2, Group F must include Site No. 34, "Solvent Area North of Building 3557". Why does Operable Unit #6 include Site No. 9, which is apparently subject to site screening?
6. Page 4 of 13 - Deliverables should be designated as "primary" or "secondary". The following documents are secondary documents:

Site Health and Safety Plan
Site Sampling and Analysis Plan (including Quality Assurance Project Plan (QAPP) and Field Sampling Plan)
Site Quarterly Progress Reports
Proposed Treatability Studies

For further clarification of the primary and secondary documents required under the FFA for each Operable Unit, please refer to Section VIII. CONSULTATION WITH U.S. EPA AND FDER, Paragraphs B, C and D. Paragraphs C.1. and D.1 both contain the following sentence pertaining to applicability of the listed deliverables "...Unless otherwise specified, the documents shall be for a specific operable unit(s)...".

7. Please see the enclosed schedule for primary documents subject to review and compliance dates in 1991.
8. The schedule of projected activities leading to a Record of Decision (ROD) for each operable unit is unacceptable. The preamble to the National Contingency Plan (NCP) and OSWER Policy Directive 9355.0-20 state that the RI/FS process leading to a ROD should not exceed 18 to 24 months. The projected dates of 1998 to 2000 for completion of ROD's is clearly unacceptable. Based on a prioritization scheme, completion of ROD's for lower priority operable units under an extended time-frame may be appropriate; however, the highest priority operable units should not significantly exceed the 18 to 24 month schedule unless appropriately justified.

The schedule for projected activities leading to the submission of draft primary documents are shown in the timeline figures to run successively, without any concurrent activities. A significant reduction in the projected schedule can be obtained by scheduling appropriate tasks concurrently. Development of both the Baseline Risk Assessment and the Feasibility Study can and should be carried out during the Remedial Investigation (RI) phase. Performing these activities during the RI phase will ensure that sufficient data will be gathered

during the RI to complete the risk assessment and remedial alternatives evaluation. Attached are the FFA Guidance and an example timeline for the remedial process. Development of the projected schedule utilizing the attached guidance should enable scheduling that is more consistent with the NCP.

Some of the durations of the projected activities leading to a Record of Decision (ROD) are excessive. The duration of Phase II field activities and report preparation of 15 months must be reduced. This duration is especially overextended considering that this is only a phase of the overall investigation. The 6 months allowed for development of the draft Baseline Risk Assessment Report should be reduced. The scheduled 19 months for carrying out the Feasibility Study should be reduced. This report typically takes one to two months to prepare. The 15 months scheduled to develop the Proposed Remedial Action Plan should be reduced to no longer than 1 to 2 months. The 11 months scheduled to develop the ROD should be reduced.

The project schedules within the site-specific work plans include up to four phases to complete the remedial investigations. The SMP identifies only two phases. Although the EPA encourages the RI to be completed in as few phases as possible, the SMP should address the four phases described in the approved work plans. If it is the intention of the Navy to carry out the RI in four phases, the duration of each phase should be aggressively scheduled so that the time for the overall RI is still within accepted time frames. Again the NCP recommends that the overall RI/FS process does not exceed 18 to 24 months. Clearly the RI portion alone should not exceed this two year time-frame.

9. The Phase II RI Work Plan should be submitted to EPA and the State as an amendment to the RI Work Plan in accordance with Section XXXI of the FFA. For planning purposes, allow 30 days for EPA/State reviews and comment of the amended work plan. Also, this would be a good time to begin treatability studies. These studies should begin as early as possible in the process so the results can be incorporated into the Feasibility Study Report. I assume the Draft Treatability Study projected for July 1995 is the Treatability Study Report documenting the results of earlier studies.

10. Please see the enclosed schedule for primary documents subject to review and compliance dates in 1991. This schedule should be applied to each operable unit, not each "batch".
11. The times for conducting the RIS from approval of the RI Work Plan through submission of the Draft FS Report should be no longer than 18 to 24 months.
12. Please revise the timelines given in the SMP through the Record of Decision (ROD) to reflect the above comments.

FFA SITE MANAGEMENT PLAN
 NAS Pensacola
 1991

Compliance Dates/Timelines for 1991

<u>Primary Deliverables:</u>	<u>Due Date/Timeline:</u>	<u>Expedited Review and Document Development Schedule</u>
Community Relations Plan	Implemented 30 days after CRP finalized.*	_____

<u>Secondary Deliverables:</u>	<u>Target Dates/Timelines:</u>	<u>Expedited Review and Document Development Schedule</u>
Draft Phase I Report	175 days from finalization of RI/FS Work Plan. EPA/State review and comments due to Navy within 30 days of receipt.	_____

Out Years Projected Schedule

<u>Primary Deliverables:</u>	<u>Projected Dates/Timelines:</u>	<u>Expedited Review and Document Development Schedule</u>
Draft Phase II Work Plan (Amendment to RI/FS Workplan)	30 days from receipt of EPA/State comments on Phase I Report.	_____
Draft RI Report	June 1992	_____

* Actual date is determined by completion of previous action. Deadlines that fall within FY 1991 in the column entitled "Due Date/Timeline" are subject to stipulated penalties in accordance with the FFA.

_____ - Blanks are provided for your convenience in providing a "Best Case" schedule.

(continued)

<u>Primary Deliverables:</u>	<u>Projected Dates/Timelines:</u>	<u>Expedited Review and Document Development Schedule</u>
Draft FS Report	September 1992	_____
Draft Baseline Risk Assessment	June 1992	_____

The actual dates for out year projections should be based on a completion time of 18 months from the approval of the RI/FS Work Plan to submission of the draft Feasibility Study Report.