



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

32501.008  
03.01.08.0003

N00204.AR.000415

NAS PENSACOLA

5090.3a

AUG 11 1992

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Linda Martin  
Remedial Activities Branch  
Department of the Navy - Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
Charleston, South Carolina 29411-0068

Re: Conditional approval of Draft Final RI/FS Work Plans for OUs 11-14;  
NAS Pensacola, Florida  
EPA Site ID No.: FL 9170024567

Dear Ms. Martin:

The Environmental Protection Agency (EPA) has completed its review of the Draft Final RI/FS Work Plans for Operable Units (OUs) 11 through 14 which were received in this office on July 7, 1992. EPA proposes to approve the present work plans, upon our receipt of insert pages which provide the following corrections to the work plan text, with the mutual understanding and agreement of all three FFA parties that the work plans will be revisited prior to implementation to assure the timeliness and the quality of the work ultimately performed.

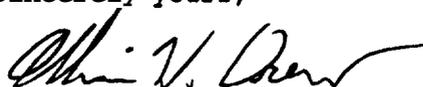
1. As indicated in our letter of June 22, 1992, Region IV defines surface soil samples as those collected from a depth range of 0-1' below ground surface (BGS). The Navy has made the appropriate corrections to two of the four work plans. EPA requests that similar corrections be made to Section 14.1.3.2 of the RI/FS Work Plan for OUs 13 (Group H) and 12 (Group Q).
2. The only method number listed for Total Organic Halogens in the SQAPPs for these work plans is SW 9020. The apparent discrepancy between this listing and the Navy's response to our comment 49b. for the OU 13 RI/FS Work Plan must be clarified

As was discussed at the June 16-17 RPM Meeting, EPA still has some significant concerns regarding the general content of these work plans. EPA is particularly concerned at the DQO Level proposed for Phase I data analyses, since this screening approach is likely to adversely impact expeditious completion of the RI/FS for these sites. However, EPA is equally concerned that further discussions on these work plans at the present time will distract the valuable resources of all parties from progress on the higher priority sites identified at the June 16-17 RPM meeting.

Aside from our general concerns regarding these work plans, it also appears likely that the revised site prioritization scheme agreed to at the June 16-17, 1992 RPM meeting will necessitate the revision of at least some of these work plans prior to implementation. Specifically, two of the sites in OUs 11-14 (including Site 38: Building 71 and Site 39: Oak Grove Campground) were identified as high-priority candidates for removal. Assuming that the removals are, in fact, carried out prior to RI/FS Work Plans implementation, the work plans will almost certainly require modification.

Should you have any questions or concerns regarding these matters, please do not hesitate to contact 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, FDBR