



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

AUG 12 1992

R.E. Ybanez
Commander, CEC, U.S. Navy
Public Works Officer
NAVSTA Roosevelt Roads
FPO Miami 34051-3001

Re: NAVSTA Roosevelt Roads - Remedial Investigation Workplan
dated April 27, 1992.

Dear Commander Ybanez:

As discussed in telephone conversations between Mr. Timothy Gordon, of my staff and various LANTDIV staff, the United States Environmental Protection Agency (EPA) Region II received the above draft workplans on July 2, 1992, and supporting background material on July 7, 1992. Due to the late receipt of the subject documents, the United States Environmental Protection Agency (EPA) Region II has not been able to complete its full review of the workplans by July 31, 1992 as requested by your letter of July 1, 1992.

However, LANTDIV staff had indicated in telcom that written comments from EPA could be submitted through August 15, 1992. Therefore, we are providing comments regarding the proposed analytical program in the above workplan, which we view as the most deficient part of the workplan. The Part B Permit Application (revision 4, dated 01/31/92) filed by NAVSTA Roosevelt Roads lists 68 hazardous wastes currently handled at Roosevelt Roads. In addition, 40 C.F.R. § 264.101 requires that a facility seeking a permit for treatment, storage, or disposal of hazardous waste must institute corrective action for all releases of hazardous waste or **constituents**, regardless of the time at which waste was placed in such unit.

Therefore, in light of the multitude of hazardous wastes currently handled, and the possibility that other hazardous wastes or constituents may have been handled in the past, EPA requests that the analytical program, as listed in Table 2-1 of Part I: Field Sampling Plan, and Table 5-2 of the "Workplan Remedial Investigation", be altered as follows:

- 1) IR Site 5 - Army Cremator Disposal Area: Do full Target Compound List (TCL). Since this area was used as the main base disposal site for at least 20 years, a full spectrum of hazardous constituents must be screened.
- 2) IR Site 10 - collapsed Building 25 area: Do full TCL. Since this area was used for nearly 40 years as a general storage area for "industrial waste", a full spectrum of hazardous constituents must be screened.
- 3) IR Site 13 - fuel tank farm and sludge burial pits: For the 14 proposed groundwater samples, do either full TCL or full Part 264 Appendix IX. Groundwater under this site is contaminated; however, a full spectrum of hazardous constituents has not been investigated. Full characterization of the groundwater is needed before final remediation can be accepted.
- 4) IR Site 14 - Ensenada Honda shoreline and mangroves: Do full TCL for the proposed 12 sediment samples. Besides VOCs, BNAs, and metals which are called for in the workplan, pesticides and PCBs are likely constituents of concern.

In addition, although EPA considers the installations on Vieques Island to be a separate facility from Roosevelt Roads, a Part 264 Subpart X Permit will evidently be required, and therefore corrective action under the authority of the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901-6991 will be required. Therefore we feel it advisable now to comment on the analytical program for the Vieques Island sites which are included in the above referenced workplan. Specifically, Table 2-1 of Part I: Field Sampling Plan, and Table 5-2 of the "Workplan Remedial Investigation" need to be altered as follows:

- 1) IR Site 1 - Quebrada Disposal Site: For the proposed 3 sediment and 6 soil samples do full TCL. Since this area was used as general facility disposal site for at least 20 years, a full spectrum of hazardous constituents must be screened.
- 2) IR Site 2 - Mangrove Disposal Site: For the 8 soil samples do full TCL. Since this area was used as general facility disposal site for at least 20 years, a full spectrum of hazardous constituents must be screened.

EPA expects that review of the remaining portions of the workplan should be completed by August 28, 1992. EPA would point out that as corrective action at Roosevelt Roads will eventually be under the Schedule of Compliance of the HSWA Permit, any corrective actions done prior to issuance of the HSWA Permit should be designed to meet EPA requirements. Should you have any questions, please contact Mr. Timothy Gordon, of my staff, at (212)-264-9538.

Sincerely yours,



Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch

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