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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

SEP 29 1995

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Stephen C. Wood, Captain, U.S. Navy  
Commanding Officer  
U.S. Naval Station Roosevelt Roads  
TSC 1008 Box 3001  
Code NO  
FPO AA 34051-3001

Re: RCRA Facility Investigation (RFI) Workplan  
U.S. Naval Station Roosevelt Roads  
EPA I.D. # PR2170027203

Dear Captain Wood:

The United States Environmental Protection Agency Region II (EPA) has completed its review of all portions of the September 1995 [Draft] Final RFI Work Plan, transmitted by your consultant, Baker Environmental, Inc., except for Appendix D, the Data Validation Methodologies. Enclosed with this letter is a more detailed "Technical Review of the September 1995 RFI Work Plan".

In addition to the submitted RFI Work Plan, a separate revised Draft Final RFI work plan for SWMUs #7 & 8 (Tow Way Fuel Farm) is to be submitted October 3, 1995, pursuant to Mr. Sindulfo Castillo's (Director Environmental Engineering Division, Public Works Department, NAVSTA Roosevelt Roads) letter of August 24, 1995.

Subject to the following slight modifications being made, EPA approves the September 1995 RFI Work Plan, except for Appendix D, Data Validation Methodologies:

1. SWMU #2: Table 4-2 of the Data Collection Quality Assurance Plan (DCQAP) must be modified to reflect that 3 sediment samples will be collected as stated on page 4-10 and shown in Figure 4-2 of the DCQAP.
2. SWMU #9: Modify Table 4-2 of the DCQAP to list 46 subsurface soil samples instead of 44. This is based on: 6 tanks x 3 excavation pits per tank x 2 subsurface samples per excavation, plus 4 new monitoring wells to be installed x 2 subsurface samples per well (page 4-17), **plus 2 samples for the additional test pit** at the known disposal area near the loading dock in the tank 216/217 area (see Figure 4-7 and page 4-16 of the DCQAP).

3. SWMU #6: Modify Table 4-2 of the DCQAP to include 1 surface water sample (conditional) for this SWMU as indicated in the text (page 4-22).

4. SWMU #13: Modify Table 4-2 of the DCQAP to list 5 surface soil samples for Appendix IX analysis (instead of 4) for this SWMU to agree with to text (page 4-24).

5. SWMU #14: Modify Table 4-2 of the DCQAP to note that the soil samples are not surface soil, but to be collected at approximately 3 feet below surface in a hand augered hole as stated on page 4-25 of the DCQAP.

6. Modify either Table 4-2 and page 4-27 of the DCQAP to list 6 surface soil samples (instead of 5) for this SWMU, or Figure 4-16, which shows 6 sample points. EPA recommends that 6 samples as shown on Figure 4-16 be collected.

7. Section 4.0 of the Project Management Plan (PMP) states that the Base Landfill (SWMU #3) comprises Operable Unit 4; yet Table 4-1 of the PMP (SWMUs Comprising Operable Unit 1) includes SWMU #3, the Base Landfill. Please modify either Section 4.0 of the PMP (page 4-1) or Table 4-1 to be consistent, and as appropriate, Figure 4-3 of the PMP, the Schedule for Operable Units 4 and 6.

8. EPA approves the schedule given in Figure 4-1 of the Project Management Plan (PMP) for Operable Unit 1 (Table 4-1 of the PMP), subject to comment 7 above. However, EPA cannot approve the schedule given in Table 4-1 for Operable Unit 2, since revised Draft Final RFI work plans for SWMUs #7 & 8 (included in Operable Unit 2) will not be submitted until October 3, 1995, pursuant to Mr. Sindulfo Castillo's (Director Environmental Engineering Division, Public Works Department, NAVSTA Roosevelt Roads) letter of August 24, 1995.

9. While EPA concurs with a staggered approach to field investigations, it cannot concur with delaying implementation of field investigations at SWMUs 1 and 2 (Operable Unit 5) and SWMUs 11/45 (Operable Unit 3) until August 1997, as shown in Figure 4-2 of the PMP. Unless satisfactory justification for such a delay can be documented based on Federal budgetary constraints, EPA requests that implementation of field investigations for Operable Units 3 and 5 commence by October 1996. Figure 4-2 of the PMP should be modified accordingly.

10. Since sampling of sediments in Ensenada Honda is described in conjunction with the investigation programs for SWMUs #1, 2, 3, 7, and 45 (cooling water tunnel entrances), EPA is not clear whether such sampling is to be implemented pursuant to the schedules for those SWMUs, or the Schedule given in Figure 4-4 of the PMP for Operable Unit 7. If this sampling is to be implemented pursuant to the Operable Unit 7 schedule, EPA

requests that, since this sampling is clearly tied to final assessment decisions regarding the above 5 SWMUs, implementation of the sediment sampling should commence by October 1997 (instead of February 2000 as shown). Figure 4-4 of the PMP should be modified to reflect this change.

EPA also has the following additional comments, however, their incorporation is not required for approval of the RFI work plans:

11. As the Project Schedules (Figures 4-1 through 4-4 of the PMP) do not list submission of quarterly reports, EPA notes that Quarterly RFI reports are required pursuant to condition B.8 of Module III of the 1994 RCRA/HSWA Permit, and should include all information required pursuant to that Permit condition.

12. SWMU #8: Subject to a separate revised Draft Final RFI work plan for SWMUs #7 & 8 (Tow Way Fuel Farm) being submitted October 3, 1995, pursuant to Mr. Sindulfo Castillo's (Director Environmental Engineering Division, Public Works Department, NAVSTA Roosevelt Roads) letter of August 24, 1995, EPA offers the following comments on SWMU #8.

a. Page 4-15 of the DCQAP states that a total of seven test pits are to be excavated at locations based on the results of GPR (ground penetrating radar). However, later in the same page it is stated that "At the three known disposal pits a single soil boring will be advanced to the top of the water table. Subsurface samples will be collected at the same intervals as the test pits". Based on Table 4-2 listing only 21 subsurface samples, it appears that only 4 test pits are to be excavated, instead of 7, and that the other 3 [possibly] known sludge disposal pits will be evaluated via a **single** soil boring at each. EPA does not agree with this approach, but recommends the approach discussed in the enclosed "Technical Review of the RFI Work Plan".

b. EPA strongly recommends that the same analytical suite proposed for the SWMU #9 sludge disposal pits subsurface soil samples (i.e., volatiles, semivolatiles, RCRA metals, and TPH) should be used for the SWMU #8 sludge disposal pits subsurface soil samples, instead of TPH alone as proposed.

13. SWMU #30: The 2 groundwater samples for Appendix IX should be preferably collected in existing wells 1983-DW1 and 1983-MW4 or MW3, if possible.

14. EPA recommends that SWMU #10 (Substation 2/Building 90) should be included with Operable Unit 3, instead of Operable Unit 1, since HYDROPUNCH investigations are slated at both SWMU #10 and SWMU #45. Table 4-1 and page 4-1 of the PMP should be modified if such a changes is made.

Within 25 days of your receipt of this letter, please submit appropriately revised pages, Tables, and Figures to address the above comments.

EPA will issue separate comments on the proposed Data Validation Methodologies within approximately 2 weeks. However, subject to satisfactorily addressing comments 1 through 10 above, implementation of the approved portions of the RFI Work Plan for Operable Unit 1 should commence pursuant to the schedule given in Figure 4-1 of the PMP (i.e., field investigations to commence by January 15, 1996).

Please contact Mr. Tim Gordon, of my staff, at (212) 637-4167 if there are any questions.

Sincerely yours,

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

Enclosure

cc: Commander S. J. Pena, NAVSTA Roosevelt Roads w/encl.  
Mr. Carl A. Soderberg, CFO w/encl.  
Mr. Israel Torres, EQB w/encl.  
Mr. Art Wells, LANTDIV w/encl.