



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

MAR 07 1997

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

S. J. Pena
Commander, CEC, U.S. Navy
Public Works Officer
U.S. Naval Station Roosevelt Roads
TSC 1008 Box 3001
Code NO
FPO AA 34051-3001

Re: RCRA Facility Investigation (RFI) Quarterly Report -
November 1, 1996 - January 31, 1997, Activities at Tow Way
Fuel Farm Free Product Recovery System.
U.S. Naval Station Roosevelt Roads
RCRA/HSWA Permit No. PR2170027203

Dear Commander Pena:

The United States Environmental Protection Agency (EPA) Region II has received the RCRA Facility Investigation (RFI) Quarterly Report for the period November 1, 1996 - January 31, 1997, transmitted on behalf of the Navy by Baker Environmental, Inc.'s letter of February 28, 1997. The Quarterly Report includes a section reporting on the Free Product Recovery Activities Conducted at Tow Way Fuel Farm (including Attachments 3, 4, and 5 [the November, December, and January Monthly Reports]), as required pursuant to terms of the 1994 RCRA/HSWA Operating Permit. EPA has determined that the section reporting on the Tow Way Fuel Farm Free Product Recovery Activities is grossly inadequate, due to the following deficiencies.

1. Numerous references are made to specific recovery wells, such as on page 3 of the January 1997 Monthly Report (Attachment 5) where it is stated "Based on gauging data, it

appears the product plume is moving to the southeast along Forestal Drive. Product in RW-8 has increased from less than 1/2 inch to over 3 inches. Product thickness at RW-1 has decreased from over 12 feet to less than 9 feet." Yet no well location map was included with this quarterly report or the attached monthly reports, nor has the Navy or its contractors ever submitted a map to EPA identifying the new recovery wells by number. All maps submitted for the new free product recovery system only show proposed well locations, without numbers assigned to the wells. EPA cannot assess progress towards implementing the recovery activity at this site without a map identifying the wells by number. **All future quarterly and monthly reports for the Tow Way Free Product Recovery System must contain a fully annotated map, with all wells identified by number.**

2. As evidenced by the above quoted statement "Based on gauging data..." from [page 3 of] the January Monthly report (Attachment 5), and elsewhere, well gauging is occurring. Yet the submitted monthly reports contain no such data. **All future quarterly and monthly reports for the Tow Way Free Product Recovery System must contain a tabulation of the water level and free product thickness for all wells (both recovery and observation) gauged during that reporting period.**

3. On page 5 of the Quarterly report it is stated "Once the commissioning phase is completed, it will be under the Operation and Maintenance (O&M) described in the Workplans." An O & M plan has never been submitted to EPA, as noted in EPA's letter of June 26, 1996 (and previous letters as far back as EPA's letter of July 27, 1995). **Please advise when the O & M Plan, currently being developed, will be submitted to EPA.**

4. On page 2 of the December 1996 Monthly report (Attachment 4) the statement is made that "Recovery well RW-3 was scheduled to be installed in existing monitoring well UGW-22." Yet the maps submitted with Mr. S. Castillo's (Director Environmental Engineering - Roosevelt Roads) letters of December 23, 1996, and by Baker Environmental's letter of September 27, 1996, in response to EPA deficiency comments, show no recovery well being installed in UGW-22.

Furthermore, on the same page (page 2 of the December 1996 Monthly report [Attachment 4]) the statement is made that "Based on this discussion [with Kathy Luke of BB&L], it is our recommendation not to install a recovery pump in this well [UGW-22] at this time and reserve the eighth pump as a spare." Yet the maps submitted with Mr. Castillo's letter of December 23, 1996, and Baker Environmental's letter of September 27, 1996, show only 7 recovery wells proposed to be installed during Phase I activities (plus 2 during Phase II, represented as occurring later). **Please clarify if in fact 8 recovery wells were planned for Phase I, and if an alternative location is now proposed for the eighth recovery well.**

5. The only information regarding the volume of free product recovered during the reporting period is given on page 5 of the Quarterly report where it is stated "During the commissioning phase approximately 200 gallons of free product have been recovered..." While EPA will accept this description for the present report; **all future quarterly and monthly reports for the Tow Way Free Product Recovery System must contain a tabulation of the exact volume of free product recovered during each month, along with a cumulative total of the volume recovered through the end of the reporting period.**

6. The only information regarding which recovery wells are , on-stream (i.e. being operated), or not (i.e. shut-in), is given on page 1 of the January Monthly report (Attachment 5) where it is stated "Pump RW-8was temporarily shut off because free product thickness was reduced to less than 1/8 th inch. The pump will be turned on as needed.", and on page 2 of that same report where it is stated "The system was shut down by Navy personnel on January 6, 1997...." **All future quarterly and monthly reports for the Tow Way Free**

Product Recovery System must contain a discussion and/or tabulation of which recovery wells are, or are not, on-stream (i.e. being operated) and the period (i.e. number of days) of their operation and/or shut-in.

Please provide a written response addressing the above comments, within 25 days of your receipt of this letter. Please contact Mr. Tim Gordon of my staff, at (212) 637-4167 if you have any questions.

Sincerely yours,



Nicoletta DiForte
Chief, Caribbean Section
RCRA Programs Branch

cc: Mr. Israel Torres, EQB
Mr. Christopher T. Penny, LANTDIV Code 1822
Mr. Tom Fuller, Baker Environmental, Inc.