



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

FEB - 9 2006

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Kevin Cloe  
Navy Technical Representative  
Installation Restoration Section (South)  
Environmental Program Branch  
Environmental Division,  
Atlantic Division (LANTDIV), Code EV23KC  
Naval Facilities Engineering Command  
6506 Hampton Blvd.  
Norfolk, VA 23508-1278

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,  
EPA I.D. Number PRD2170027203,

Revised Final Corrective Measures Study (CMS) Final Report for Tow Way Fuel Farm  
(SWMU 7 and 8), dated November 22, 2005.

Dear Mr. Cloe:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the Navy's November 22, 2005 revised Corrective Measures Study (CMS) Final Report for Tow Way Fuel Farm (SWMU 7 and 8) and the Responses to EPA's October 13, 2005 Comments. EPA has determined that both are conditionally acceptable, subject to implementation of public review by the Navy of the proposed Corrective Measure/final remedy (as made in Section 3.2 of the revised CMS Final Report). That public review should meet the substantive requirements given at 40 CFR § 270.42(b).

The proposed Corrective Measure/final remedy for Tow Way Fuel Farm (SWMU 7 and 8) is Alternative 1 plus the Alternative 3 soil excavation, as discussed in Section 3.2 of the CMS Report, and involves institutional controls, soil removal, monitored natural attenuation (MNA) for dissolved constituents in the groundwater, and containment/collection of phase separated hydrocarbon (PSH) on the groundwater. Specifically, this proposed Corrective Measure/final remedy includes:

a) excavation of PAH and arsenic contaminated surface soils to a depth of two feet below ground surface (approximately 1919 cubic yards of PAH contaminated soils and approximately 5852 cubic yards of arsenic contaminated soils will be removed);

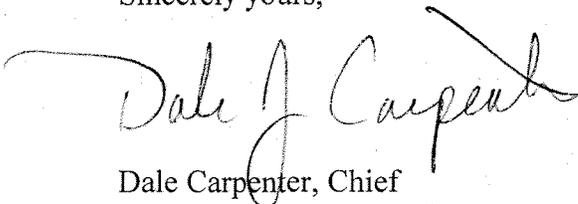
- b) operation of a phase separated hydrocarbon (PSH) skimming system (consisting of pneumatic skimmer pumps in 60 wells) to reduce/remove PSH present on the groundwater to a corrective action objective (CAO) of a residual thickness of 0.01 feet or less;
- c) monitored natural attenuation (MNA) for remediation of dissolved organic constituent plumes in the groundwater; and
- d) placement of land use controls/institutional controls over the areas impacted by releases from Tow Way Fuel Farm (SWMU 7 and 8). Such land use controls/institutional controls would include: 1) prohibition of development of buildings on the site that may be occupied on a regular basis by humans, and 2) prohibition on usage of the groundwater impacted by releases from Tow Way Fuel Farm (SWMU 7 and 8) for potable purpose.

Pursuant to Conditions I.K and III.E.9 of the facility's existing RCRA permit, the Navy must implement public review of the proposed Corrective Measure/final remedy (as made in Section 3.2 of the revised CMS Final Report), prior to EPA's final approval of it. That public review should meet the substantive requirements given at 40 CFR § 270.42(b).

To support that public review, no later than 60 days from your receipt of this letter, please submit for EPA's review and approval a draft Statement of Basis summarizing the proposed Corrective Measure/final remedy for Tow Way Fuel Farm (SWMU 7 and 8) and why that Corrective Measure/final remedy is protective of human health and the environment.

If you have any questions, please telephone Mr. Timothy R. Gordon, the Remedial Project Manager, at (212) 637- 4167.

Sincerely yours,



Dale Carpenter, Chief  
Caribbean Section  
RCRA Programs Branch

- cc: Ms. Yarissa Martinez, P.R. Environmental Quality Board  
Mr. Julio I. Rodriguez Colon, P.R. Environmental Quality Board  
Lt. Commander A. Ferguson, Naval Activity Puerto Rico  
Ms. Kathy Rogovin, Booz Allen & Hamilton  
Mr. Mark Kimes, Baker Environmental