



DEPARTMENT OF THE NAVY

NAVY ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

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Date Received: 1/10/00
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Base Project Code: M KIMES / PROJ. E: J ETHRIDGE;
DAILY FILE
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IN REPLY REFER TO:

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JAN 13 2000

U. S. Environmental Protection Agency
Region II
Attn: Ms. Nicoletta DiForte
Chief, RCRA Caribbean Section
290 Broadway-22nd Floor
New York, New York 10007-1866

Re: U.S. Naval Station Roosevelt Roads, Puerto Rico
RCRA Corrective Action Program
RCRA/HSWA Permit No. PR2170027203
Task I CMS Report for SWMU 7/8-Tow Way Fuel Farm
Operable Unit (OU) 2

Dear Ms. DiForte:

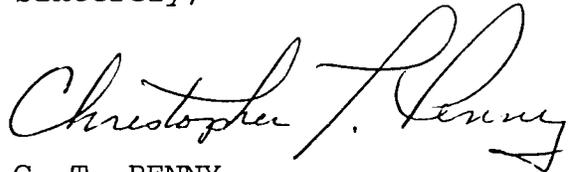
Per the request of Mr. Tim Gordon, the Navy is providing you with the issues that needed to be addressed in the revision of the Task I CMS for SWMU 7/8-Tow Way Fuel Farm to extend the delivery schedule. The Navy provided the EPA a revised Section 3.0 (Establishment of Corrective Action Objectives) of the Task I CMS on April 21, 1999. The EPA provided comments on this document on June 30, 1999. In this comment letter the EPA asked for a complete stand-alone Task I CMS document that provides sufficient data to allow for independent assessment of the adequacy of the proposed clean-up levels.

The Navy will submit the Task I CMS for the TWFF in its entirety on January 20th, 2000 for receipt to the EPA on Friday, January 21, 2000. This submission will address all of the concerns raised by Booz Allen & Hamilton in their review of the CMS. This document will be a stand-alone document, which will allow for independent assessment of the adequacy of the proposed clean-up levels as you requested. In addition, the Navy has received other comment letters from the EPA and Booz Allen & Hamilton on other risk assessments subsequent to the submission of the initial draft of TWFF Task I CMS. Because of the nature of these recent comments, the Navy also wanted to ensure that the CMS Task I document and/or revisions made contained the necessary discussion to support the risk assessment assumptions and conclusions presented in the document.

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Please do not hesitate to call me at (757) 322-4815 if you have any questions or desire further clarification of any of the points discussed in this letter.

Sincerely,



C. T. PENNY
Navy Technical Representative
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:
EPA Region II (Mr. Tim Gordon)
NSRR (Ms. Madeline Rivera)
PREQB (Mr. Isreal Torres)
Baker Environmental Inc. (Mr. Mark E. Kimes)
CH2M Hill (Mr. John Tomik)