



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 05 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Rakowski, P.E., DEE
Head, Environmental Program Branch
Environmental Division
Atlantic Division (LANTDIV), Code 182
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Re: Naval Station Roosevelt Roads - SWMU #6 (Building 145)/AOC B (Building 25) Area
revised Risk Assessment, and request for a Corrective Measures Study (CMS),
EPA ID # PR2170027203

Dear Mr. Rakowski:

As discussed during the November 2, 1999 Roosevelt Roads monthly conference call between Navy staff (Christopher Penny, et. al.) and contractors, and Mr. Tim Gordon of my staff [EQB staff also normally participate, but were not available this month], the United States Environmental Protection Agency (EPA) Region II had apparently, inadvertently, never issued comments on the revised Risk Assessment for SWMU #6/AOC B, transmitted on November 24, 1998 by Baker Environmental Inc., on your behalf. [EPA, in our letter of February 12, 1999, had reviewed and commented on other portions of your November 24, 1998 submittal.] EPA has now completed its review of the revised Risk Assessment for SWMU #6/AOC B. Because unacceptable risks are indicated, not only for both adult and young children (total cancer risk 6.2×10^{-4} and 3.8×10^{-4} , respectively, and Hazard Indices of 3.1 and 7.6 respectively) under possible future residential land-usage scenario, but also under current land-usage, for on-site workers (total cancer risk 2.0×10^{-4}), EPA cannot approve a no further action required recommendation for the SWMU 6/AOC B area.

With submission of the November 24, 1998 Revised Risk Assessment, the RFI phase is now completed for the SWMU 6/AOC B area. However, because unacceptable risks are indicated, further action is required. EPA requests that, within 60 days of your receipt of this letter, the Navy submit either a workplan for conducting a CMS, or if a "presumptive remedy" and/or engineering and institutional controls are to be proposed, the Navy, if it chooses, may omit a CMS workplan, and submit instead the draft CMS Final Report within 60 days of your receipt of this letter. If submitted at that time, the draft CMS Final Report shall include a proposal for either a "presumptive remedy" (such as soil excavation and removal of the contaminated

standing water inside the bunker at SWMU 6), and/or engineering (such as secure fencing) and institutional controls (such as land use restrictions), or only engineering and institutional controls, and describe how the proposed remedy will be protective of human health for the SWMU 6/AOC B area, under both current and possible future residential land-usage.

It should also be noted that EPA in our letter dated September 15, 1998 had stated that since restriction on future site usage would be required if no other corrective measures were implemented at the SWMU 6/AOC B area, a CMS and CMI documenting any "institutional controls" would be required. The Navy, in its [Baker Environmental's] November 24, 1998 letter, had responded that it intended to comply "at the appropriate time". Pursuant to Condition III.E.5(d) of the 1994 Final RCRA Permit, the CMS [work] plan is required 60 days after notification by EPA that a CMS is required. Since there may have been some past confusion on this with regards to the SWMU 6/AOC B area, this letter shall constitute that notification.

Please telephone Mr. Tim Gordon of my staff at (212) 637- 4167 if you have questions regarding any of the above.

Sincerely yours,



Nicoletta DiForte, Chief
Caribbean Section
RCRA Programs Branch

cc: Mr. Israel Torres, Attn. Ms. Luz Muriel-Diaz, PREQB
Ms. Madeline Rivera, NAVSTA Roosevelt Roads
Mr. Christopher Penny, LANTDIV
Mr. Mark Kimes, Baker Environmental
Mr. John Tomik, CH2M Hill
Ms. Connie Crossley, Booz Allen