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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

AUG 31 1992

Certified Mail
Return Receipt Requested

R.E. Ybanez
Commander, CEC, U.S. Navy
Public Works Officer
NAVSTA Roosevelt Roads

Re: NAVSTA Roosevelt Roads - Remedial Investigation Work Plan dated April 27, 1992

Dear Commander Ybanez:

The United States Environmental Protection Agency (EPA) Region II has completed its review of the Remedial Investigation/Feasibility Study (RI/FS) work plans for eight Installation Restoration (IR) sites at NAVSTA Roosevelt Roads, which were transmitted to us by your letter of July 1, 1992. We have previously submitted to you, in our letter of August 12, 1992, preliminary comments on these RI/FS workplans.

EPA has had the RI/FS workplans reviewed by our contractor, TRC Environmental Corporation, with regards to the eight IR sites (5,6,7,10,13,14,18, and 21) which are part of the contiguous facility of Roosevelt Roads. TRC did not review IR sites 1 and 2 on Vieques Island, although many of the general comments in the TRC review are also applicable to the workplans for IR sites 1 and 2. A complete copy of TRC's comments is attached.

EPA has reviewed TRC's comments, and are in basic agreement with the concerns raised. EPA concurs with TRC's summary statement that "...this Work Plan does not satisfy the requirements of an RI/FS Work Plan as defined under CERCLA, nor does the Work Plan provide for a comprehensive investigation to satisfy the RCRA approach to environmental investigation and cleanup. The Work Plan does not effectively: (1) evaluate existing physical and chemical data available for the study areas; (2) establish conceptual models which fully outline all potential sources,

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pathways, and receptors; (3) define data gaps with respect to contaminant distribution and site hydrology; (4) identify potentially applicable remedial alternatives for the data requirements and technology evaluation; (5) formulate up-to-date comprehensive approaches to risk assessment and feasibility study development; and (6) provide for the conduct of investigations at each site which are comprehensive enough to fully determine the nature and extent of contamination...."

EPA concurs with TRC statements that "...the Work plan does not develop a strategy which will result in a comprehensive investigation. In turn, the data generated are not likely to be sufficient to support a risk assessment and development of appropriate remediation alternatives. Likewise, since all of the sources, pathways, and receptors are not adequately addressed, there is the possibility that the remedial efforts and risk assessment analysis will not address some significant exposure scenarios and sources of contamination."

EPA likewise concurs with, and wishes to highlight, the following specific TRC comments:

1) " The development of a feasibility study (or Corrective Measures Study under RCRA) requires that accurate volume estimates of contaminated material...be obtained.... The field investigation tasks outlined in this Work Plan are not extensive enough to achieve this...."

2) "....the proposed laboratory analysis are referred to using such terms as VOCs, BNAs, metals, etc. The Work Plan needs to identify specific analytical constituents, methods, and associated detection limits."

3) "The discussion of ground water behavior...is severely deficient.... Direct hydraulic parameter measurements, such as hydraulic conductivity and permeability, are not proposed in the Work Plan. These aquifer measurements are needed to determine contaminant migration rates.... The Work Plan should also include provisions for collecting such basic ground water parameters as pH, redox potential (Eh), temperature, turbidity, and conductivity."

4) "The Work Plan should provide justification for not evaluating Site 13 subsurface soil samples for VOCs (other than BTEX) and metals (other than lead)." EPA recommends that the same discrete analytes sampled for in the surface soil samples (VOCs, BNAs, metals) should be investigated in the subsurface soil samples. TPH analysis will not achieve this.

5) "Samples collected from Sites 18 and 21 should also be analyzed for semi-volatile organic compounds, as these are often associated with the carriers used to apply pesticides."

6) "The text should explain the reasoning for the selection of the eight-foot depth (for soil sampling at IR Site 21) and discuss whether sampling is continuous to that depth."

7) "....the Work Plan should clarify how the location of the disposal area (at Site 5) and the vertical and lateral extent of contamination will be determined.... In addition future exposure to ground water and subsurface soils appears to be a possibility. Considering the above, it needs to be explained why only surface soil samples will be collected from this site (Site 5)."

8) "....it appears there is a crest of a hill in the middle of this site (Site 5 - figure 5-3). The text should discuss the reasoning in sampling on only one side of the site (Site 5)."

9) For Site 6.... "One well is not sufficient to characterize this site.... At least one upgradient and three downgradient wells should exist/be installed."

10) For Site 7.... "The Work Plan must justify why no subsurface soils are to be collected...the lateral and vertical extent of fill material, landfill disposal patterns, topography and drainage, depths to ground water, and potential confining layers all must be determined during the RI, in addition to establishing the nature and extent of contamination."

11) For Site 13.... "It is important to collect (subsurface soil) samples from below the bottom of the tank (but none scheduled)...no information on how deep the wells will be or where they will be screened. This information needs to be included so that the effectiveness of the wells in measuring contamination may be evaluated."

12) "The methodology presented for conducting the baseline risk assessment often does not follow EPA guidance...." Details are given beginning on page 18 of the attached comments by TRC.

13) "The Work Plan should state that IRIS is the primary source for toxicity criteria and that HEAST (Health Effects Assessment Summary Tables) will be referenced as a secondary source only when criteria are not available in IRIS...it is not appropriate for the contractor to derive toxicity values for use in the risk assessment."

14) "Most of the soil sampling locations selected are slated for surface soil collection (with a trowel) only. Such a soil sampling program will not define the three-dimensional distribution of contaminated material...."

15) "Some of the analytical methods are questionable, as they may lead to detection limits which are greater than the ARAR maximum contaminant levels. Methods need to be selected that will achieve detection limits that are close to the relevant standards." Details are given beginning on page 23 of TRC's comments.

16) "The decontamination procedures listed are incorrect. The correct procedures need to be included in the document. The same is true for some holding times." Details are given on pages 22, 25, 26, 27.

17) "The Quality Assurance Project Plan (QAPjP) does not discuss data reduction. This item needs to be addressed and included in the QAPjP. In addition, the QAPjP should include a section describing the various types and number of QA/QC blanks to be collected...."

In addition to these specific items, EPA essentially concurs with the full text of the attached TRC comments. EPA recommends that all concerns raised in the TRC comments be addressed, along with the comments in our August 12, 1992 letter. Either a revised work plan should be submitted, or these concerns may have to be addressed during future investigatory work.

As pointed out in our August 12, 1992 letter, EPA would urge that any corrective actions done at NAVSTA Roosevelt Roads prior to issuance of the HSWA Permit should be designed to meet EPA requirements, as corrective action at Roosevelt Roads will eventually be under the Schedule of Compliance of the HSWA Permit. Should you have any questions, please contact Mr. Timothy Gordon, of my staff, at (212) 264-9538.

Sincerely yours,

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

Attachment

cc: Jose Negron - NAVSTA Roosevelt Roads, w/o attachment
Sindulfo Castillo - NAVSTA Roosevelt Roads, w/o attachment
Paul A. Rakowski - LANTDIV Code 182, w/o attachment
Laurie A. Boucher - LANTDIV Code 1823 w/o attachment
James Szykman - LANTDIV Code 1823 with attachment
Carl-Axel Soderberg - EPA CFO w/o attachment
Flor del Valle - PREQB w/o attachment