

ATLANTIC DIVISION  
 NAVAL FACILITIES ENGINEERING COMMAND  
 NORFOLK, VIRGINIA 23511-6287

MEMORANDUM TO FILE

17 MAR 92

Subj: MARCH 13, 1992 MEETING BETWEEN EPA REGION II (RCRA) AND LANTDIV (CODE 1823) AT EPA REGION II'S OFFICE IN NY CONCERNING THE RFA FOR NAVSTA ROOSEVELT ROADS, PR

1. Meeting attendees and their affiliations are as follows:
- |                          |                     |              |
|--------------------------|---------------------|--------------|
| Maritza Montesinos-Gross | LANTDIV Code 1823   | 804-445-9897 |
| Laurie A. Boucher        | LANTDIV Code 1823   | 804-445-1814 |
| Nina M. Johnson          | LANTDIV Code 1822   | 804-445-6643 |
| Louis Speas              | LANTDIV Code 1812   | 804-445-6645 |
| Eileen C. Villafañe      | PREQB Superfund     | 809-767-8071 |
| Timothy R. Gordon        | USEPA HW Facilities | 212-264-9538 |
| Barry Tornick            | USEPA HW Facilities | 212-264-9601 |
| Vivian Chin              | USEPA HW Facilities | 212-264-9539 |

2. Summary of meeting is as follows:

\* The RFA was never submitted to the Navy for review and comment because it was considered by EPA to be in "draft" form.

\* The RFA was recently given to the Navy, thereby this meeting was established.

\* We asked EPA when they expect to issue the draft permit and will they allow us to input? EPA said we will be informed about the most important aspects before it goes out for public comment, but the whole document will probably not be given to us for review.

\* The permit process will most likely not be delayed due to the ongoing efforts at the IR sites nor the future efforts at the RFA sites. However, the permit must indicate what the plans are to be at the RFA and IR sites. This does not have to be in major detail nor does a schedule need to be provided unless one exists.

\* Since there is insufficient manpower in the Superfund branch to handle the IR efforts, there won't be enough manpower to handle the additional sites identified in the RFA. Therefore, EPA wants all IR and RFA sites to be handled under RCRA regulations versus CERCLA.

\* It is understood that the Navy is in the middle of two projects already contracted out to follow CERCLA guidance. The Navy can not drastically change these contracts. EPA said they will try to work with us in maintaining these efforts smooth. EPA will try not to have us repeat any work just so we can follow RCRA guidance to a "T".

\* We agreed to provide EPA with a letter addressing each RFA site. For those RFA sites which we are currently working on, we are to provide them a summary of the efforts conducted to date (i.e., provide them copies of past

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reports) and indicate our plans for the future of these sites. If a site is being considered for a possible drop from the program, we must provide EPA with our reasons. EPA appears to be willing to drop sites if we can provide them with good and detailed reasons. Some legitimate reasons for possible drops are that they are being handled under a different program such as UST, data indicates no significant impact, impossible to even locate the area of contamination for study or it has been cleaned-up. For those RFA sites which we believe require additional work, EPA would like some idea of our future plans, including schedules whenever possible. If we have sites in the IR that were never indicated in the RFA, EPA wants us to include these too. Again they would like to know their past, present and future status.

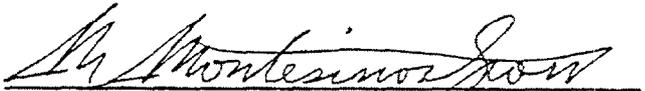
\* EPA is to be included in the review and comment process. They cannot guarantee they will respond on a timely manner nor can they provide us with an answer within a specified time frame. EPA will get to it when they can....1 month to maybe 6 months!!! We indicated that due to the nature of our contracting mechanism we need to know in advance the schedule and the work planned. EPA understands our dilemma and realizes we will have to risk going forward with our plans when we have not received any comments from them. EPA said it would help a great deal if we could provide them with schedules, that way they can arrange their time and people ahead of time, thereby lessening our risk. But again no guarantees.

\* We indicated to EPA that we have signed agreements with various EPA regions where all agree to meet certain timeframes. Unfortunately these agreements are under CERCLA program, but the RCRA people are willing to pursue this. Until otherwise told that which is indicated in the above paragraph holds.

\* We questioned EPA about what to do with the numbering of the sites. We indicated a desire to maintain the numbering system in the IR and to change the RFA site numbering to follow in consecutive order thereafter. They didn't seem to mind this since the IR numbering is more well known due to reports having been produced and provided to EPA as well as the public. The RFA report has only been in EPA hands and is a "draft". Mention new numbering system in letter to EPA.

\* IR site 21 is in the process of RCRA closure. All reports and sampling data from the IR efforts at this site should be provided as part of the closure plan. This data will be provided to the activity so that it can be included in the closure plan. The SI report being prepared for this site must be separate from any other reports being produced as part of the IR efforts by Baker Environmental, Inc. (CLEAN CTO-0007).

\* EPA would like us to refer to the sites as SWMUs versus RFA sites.

  
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