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Ms. Nicoletta DiForte  
March 26, 1997  
Page 1

April 4, 1997

U.S. Environmental Protection Agency  
Region II  
290 Broadway, 22nd Floor  
New York, New York 10007-1866

Attn: Ms. Nicoletta DiForte  
Chief, Caribbean Section  
RCRA Programs Branch  
290 Broadway, 22nd Floor  
New York, NY 10007-1866

Dear Ms. DiForte:

The Navy is presently planning projects and budgets for future years. A part of this planning process involves procedurally "closing out" sites where no more work under the installation restoration program will be required. A review of the Draft RFI report for OU 1, 6 and 7 at Roosevelt Roads and the subsequent EPA comments (November 8, 1996 letter) appears to indicate that there are a number of sites for which the provisions of corrective action have been met.

We have discussed this situation with Mr. Tim Gordon of your staff and, based on these discussions, have determined that receiving your written concurrence now by letter on the status of these sites would be sufficient for our purposes. At this juncture, it does not appear to be cost efficient for either of our organizations to engage in the formal petition process to remove sites from the permit necessitating permit amendment. Rather, with your written concurrence now, the Navy can be more effective in programming and directing funds to other sites of concern in lieu of formal petitioning. Based on the premise that the provisions of corrective action have been met for these sites, and with your concurrence, the Navy understands that EPA will officially remove these sites from the permit at the time it is expected to be reissued in 1999.

The sites which received no comments from EPA review of the Draft RFI Report are:

SWMU 12 - Fire Training Pit Oil/Water Separator  
SWMU 14 - Fire Training Pit Area  
SWMU 23 - Oil Spill Separator Tanks  
SWMU 24 - Oil Spill Oil/Water Separator  
SWMU 30 - Former Incinerator  
SWMU 37 - Waste Oil Storage Area/Building 200  
SWMU 39 - Former Battery Drain Area/Building 3158  
SWMU 51 - New AIMD Storage Pad/Building 379

Ms. Nicoletta DiForte

March 26, 1997

Page 2

Based on the lack of EPA comments, the Navy assumes the Phase I RFI work satisfied the corrective provisions of the RCRA permit for these sites. At your earliest convenience, we would like to receive written confirmation of our assumption. The Navy understands that your confirmation will be predicated on there being no further information regarding releases or potential releases from these sites being discovered in the future. The confirmation also obviously does not reduce the Navy's liability for any future releases.

Ms. Nicoletta DiForte

March 26, 1997

Page 3

Please do not hesitate to call me at (757) 322-4815 if you have any questions or desire to discuss any of the contents of this letter. The navy appreciates your assistance in this matter.

Sincerely,

Christopher T. Penny  
Navy Technical Representative

cc: Ms. Madeline Rivera - NSRR  
Mr. Thomas Fuller - Baker