



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

2/1/95-00678  
Rec'd 2/17/95 mmw  
18 cm 188 rad 185 2/17/95-  
1865  
(Info/file)

February 1, 1995

Mr. Jim Harris  
Environmental Quality Division  
Department of the Navy  
Atlantic Division  
Naval Facilities Engineering Command  
1510 Gilbert Street  
Norfolk, Virginia 23511-2699

Dear Mr. Harris,

Listed below is the agenda for the meeting on Wednesday, February 15, 1995 at 10:00am in EPA Region III's office.

**Item 1:** In Oceana's letter to Mr. Robert Greaves dated June 16, 1994, Oceana states that Oceana believes that industrial occupational scenarios are the reasonable goal at the Oceana Naval Air Station (NAS) sites. It is the policy of EPA Region III that risk assessment exposure calculations be based on Residential Scenarios. If Oceana wishes they can include industrial scenarios in their risk assessment for the RFI.

**Item 2:** The following are actual and/or potential violations of the Consent Order: a) Lack of notifying the EPA project coordinator at least fourteen (14) days before engaging in any field activities, reference Oceana Progress Report dated 11 October, 1994; b) Revising the Project Management schedule without prior notification to the EPA and without EPA's approval.

**Item 3:** EPA has noted that Oceana has consistently violated Section XIV, Paragraph 2, NOTIFICATION AND CERTIFICATION OF DOCUMENTS of the Administrative Order on Consent (Consent Order). Oceana routinely sends the EPA Project Coordinator uncertified documents such as bimonthly Progress Reports, notices of field activities, appraisals of Installation Restoration (IR) activities, etc. Any data and factual presentations submitted by Oceana pursuant to the Consent Order must be certified by the Head, Installation Restoration Section, Atlantic Division, NAVFACENCOM. The certification of the responsible official required by paragraph 2, Section XIV, must be in the form of paragraph 3, Section XIV.

timeline, CPM. All timelines are to be revised with due notification to the EPA. This will ensure that the RFI Report timeline, CPM, that the EPA is reviewing is the latest version of the timeline, CPM.

**Item 7:** Oceana must send two copies of all documentation and official correspondence to:

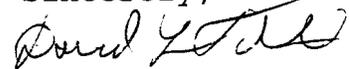
Steve Frazier  
Virginia Department of Waste Management  
Virginia Department of Environmental Quality (VADEQ)  
P.O. Box 10009  
101 East Main Street  
Richmond, Virginia 23240

Furthermore, for Oceana to progress with the remediation of its Facility from the RFI to the Corrective Measures Study with the approval of the EPA, these comments and concerns must be addressed as soon as possible. Therefore, we recommend that Oceana contact the EPA Project Coordinator as soon as possible for a meeting to discuss and clarify these comments.

EPA recognizes that to date, Oceana has been allowed to pursue their present mode of operation. However, this mode will no longer be accepted by EPA from the date of receipt of this letter by Certified Mail. For Oceana to proceed in an acceptable manner to the EPA and with EPA's approval, Oceana must follow the procedure outlined in these comments.

If you have any questions, concerns, and/or comments I can be reached by phone at (215) 597-6688 and/or FAX at (215) 597-7906.

Sincerely,



David L. Toth  
Project Coordinator  
RCRA 3HW61

cc: Harry Daw, Chief, 3HW61  
Patricia Hilsinger, 3RC33  
Joel Hennessy, 3HW61  
Betty Ann Quinn, 3HW61  
Erica Dameron, VADEQ  
Steve Frazier, VADEQ  
Jay Roberts, VADEQ, OECA  
Dave Bolton, VADEQ, TRO  
John Berard, CORPS-Norfolk  
Captain W.H. Shurtliff, Commander, U.S. Navy  
Nina M. Johnson, Oceana NAS  
James F. Harris, Oceana NAS