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Ser N02C-B14/

U.S. Environmental Protection Agency  
Region II  
Attn: Mr. Andrew Bellina, P.E.  
Chief, Hazardous Waste Facilities Branch  
New Jersey-Caribbean Permitting Section  
290 Broadway, 22<sup>nd</sup> Floor  
New York, NY 10007-1866

Gentlemen:

This letter is to respond to the concerns mentioned in your letter of April 5, 1996 regarding the current system installed at the Tow Way Fuel Farm, Solid Waste Management Unit (SWMU) # 7. We will respond to each of your concerns as presented in your letter.

EPA's concern: Using recovery wells PW-1, 2, 3, 4, 5, 6, and MW-1 vice wells with greater free product layers.

Navy reply: We agree with your comment, however we want to reiterate that the current system installed at SWMU #7 is intended as an emergency response action under the Underground Storage Tank (UST) program to prevent/inhibit migration of the free product plume. This system is not intended as the Interim Corrective Measures (ICM) recommended in the Corrective Action Plan (CAP) approved by the Puerto Rico Environmental Quality Board (EQB). We do not plan to make any modifications to this emergency response system since it will be replaced by a new system to perform the ICM. The monthly progress reports being forwarded to your office are submitted to comply with Condition B.8 of Module III of the November 1994 Resource Conservation and Recovery Act/Hazardous and Solid Waste Amendment (RCRA/HSWA) Operating Permit and not to report operations under the 1994 CAP since we have not begun ICM work.

EPA request: Explanation why recommendation of installation of free product at UGW-25 has not been implemented.

Navy reply: Again the Navy reiterates that the scope of the current contract is for an emergency response action to prevent migration of the free product. Due to contractual constraints and funding limitations, Terra Vac.'s recommendation has not been implemented in the current contract. However, we have awarded a contract which will install a free product recovery system as recommended by the approved CAP. This new system will install recovery wells at optimum location to recover free product. We have completed the design phase of the

new system to be installed as the ICM. We anticipate the operation of the emergency response system to end by September 1996 when the new system will start. A copy of the Plans & Specifications (P&S) will be included in the upcoming RCRA Permit Quarterly Report which will be forwarded to your office in May 1996.

EPA's concern: The locations of the seven present wells do not conform with the recovery well locations recommended in the approved CAP.

Navy reply: These wells were installed for the evaluation of the existing system so that we could address the issues mentioned in your letter of July 27, 1995. They were not intended to replaced the wells recommended in the approved CAP. The recommended wells in the CAP will be installed as described in the P&S performance criteria. The criteria in the P&S of the Remedial Design (RD) document requires both trench and recovery well placement in the areas of the thickest product based on bail down tests as identified by the CAP. However, the P&S allows flexibility for the Remedial Action Contractor (RAC) to modify locations as conditions change, or new site information becomes available. Specific pump types and sizes although suggested in the P&S, may also be modified by the RAC to meet requirements for site specific conditions at the time when the final system is installed. The Navy has arranged for this flexibility so that modifications are possible, if necessary. We have every intent to capture free product in wells containing free product and agree that the greatest priority should be those areas with the greatest product on the water table.

EPA's concern: Unilateral revisions in the free product recovery system without EPA approval.

Navy's reply: Again we reiterate that the current system is not intended as the ICM but as a quick response to prevent migration of the free product. In your letter you state that we have implemented the September 1994 CAP. However, as stated above, P&S implementing the approved CAP will be forwarded to your office in May 1996.

EPA's: Recommend the Navy to perform groundwater modeling.

Navy reply: The Navy believes that it would be important to develop a groundwater model to understand transmissivity and simulate a proposed recovery system if groundwater were to be extracted and treated. Groundwater is not planned for recovery or treatment at the Tow Way as part of the ICM, and since transmissivity of groundwater and free product are different, a groundwater model will not provide specific information relative to optimal recovery rates or capture of free product. Expected recovery rates have been determined using the existing empirical data available and, if necessary, these rates can be re-evaluated following pilot testing during the construction of the new system by the RAC contractor.

EPA's concern: Incorporation of multi-well testing data.

Navy reply: This data was to evaluate ways to improve the efficiency of the emergency response system. The data has been provided to the contractor who will perform the ICM for use, if appropriate.

From the concerns raised in your letter, it appears that we have not clearly communicated to you that we have not yet begun the ICM under the approved CAP. Our efforts to date are a result of when the site was under the UST program and are targeted to prevent migration of the free product. The enclosed chart provides the chronology of events for the Tow Way Fuel Farm. We hope that this clarifies your concerns.

Again, we would like to restate that we are committed to cleanup of this site and are willing to meet with you and your staff to go over this matter at your earliest convenience.

If you have any questions, please contact Mr. Pedro Ruiz, Pollution Abatement Program Manager, at (809)865-4429.

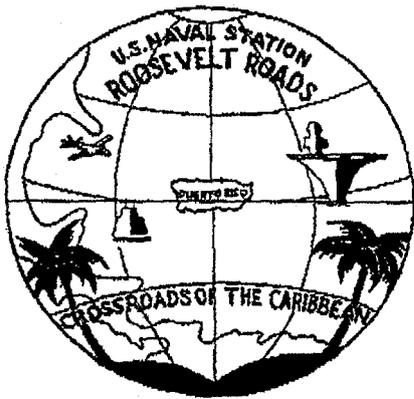
Sincerely,

S. J. PEÑA  
Commander, CEC, U.S. Navy  
Public Works Officer  
By direction of the  
Commanding Officer

Copy to:  
Environmental Quality Board  
Attn: Katherine Batista  
Underground Storage Tank Office  
P.O. Box 11488  
Santurce, PR 00910

Environmental Quality Board  
Attn: Israel Torres  
Land Pollution Control  
RCRA Section  
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FACSIMILE TRANSMISSION COVER SHEET  
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TOTAL NUMBER OF PAGES INCLUDING COVER SHEET: 12		DATE: 25 Apr 96	
SUBJ: TOW WAY FUEL FARM (SWMU # 7)			
FROM: Pedro J. Ruiz	TO: Tim Gordon	AGENCY: USNS ROOS RDS/PWD/EED	AGENCY: EPA, Region II
NAME/CODE: N02C-B14	NAME/CODE:	TELEPHONE: (787) 865-4429	FAX #: (212)637-4437
<p><b>MESSAGE:</b> Tim, enclosed is an advance copy of the additional information regarding the current system installed at the Tow Way. The Appendices are too big to fax but you have copies anyway since they are previous reports submitted to you. We wanted to send the April 5, 1996 response with this but that is now going through our chain of command for comments, so we did not want to delay this any further. If you have any questions, please let me know.</p> <p>Copy to:          Art Wells (LANTDIV)</p>			

Art, after a few revisions, this is what this letter looks like now. As you can see Cdr Peña will sign the letter, most likely Monday 29. The chart of events I'll fax you later

PJR  
 4/25/96