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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

FEB 7 5 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Captain Stephen C. Wood
Commanding Officer
U.S. Naval Station Roosevelt Roads
TSC 1008 Box 3001
Code NO
FPO AA 34051-3001

Re: Draft Work Plan - Investigation, Characterization, and
Interim Corrective Measures, Site 16/SWMU 45 (Old Power
Plant)
U.S. Naval Station Roosevelt Roads
RCRA/HSWA Permit No. PR2170027203

Dear Captain Wood:

The United States Environmental Protection Agency (EPA) Region II has completed its review of the Draft Work Plan - Investigation, Characterization and Interim Corrective Measures (ICMs) Site 16/SWMU 45 (Old Power Plant) transmitted February 7, 1995 by your consultant, Baker Environmental, Incorporated. As was discussed in telephone conversation on February 10, 1995 between Mr. Art Wells of Atlantic Division, Naval Facilities Engineering Command (LANTDIV), and Mr. Tim Gordon of my staff, EPA has the following comments:

1) The work plan submitted is for investigation and characterization only, and will be used as the basis for developing ICMS. There are no ICMS proposed in the work plan, as submitted. These will be developed based on the results of the investigations.

2) The work plans are designed to accomplish the following objectives only:

* characterization of the contents of the two 50,000 gallon underground storage tanks (USTs), and possible (work plan not definitive) **visual** assessment of past release potential into underground concrete vaults and the surrounding subsurface soils,

* locating the cooling water tunnel to Ensenada Honda and investigation/characterization of any fluids and sediments in the tunnel (however, since the number of sampling points is not specified, the extent to which characterization will be complete cannot be ascertained, pending receipt and review of the results report).

However, since there is no attempt to definitively assess possible releases into the subsurface soils and groundwater, through sampling of these media, ICMs designed based on results of the investigations in the draft work plans, **may not necessarily satisfy final investigation or remediation requirements**, i.e., the investigations as proposed cannot definitively be used as the basis for establishing no release impact to the subsurface soils, and consequently no release to groundwater. This is especially true with regards to the two 50,000 gallon USTs, since it is beyond question that they have in the past contained materials capable of releasing hazardous constituents. It is highly unlikely that visual inspection alone could definitively establish no release impacts.

3. Section 3.2.1 does not clearly include PCBs as analytes to be characterized during the UST sampling. Since there are extensive confirmed releases of PCBs into the soils surrounding the power plant and the Puerca Bay cooling water tunnel, both ascribed to disposal of transformer fluids (and references of possible similar disposal into the two abandoned USTs), EPA requires that PCBs be added as analytes for the UST samples.

Consistent with the schedule (Figure 5-1) in the work plan, please provide EPA with 3 copies of the results report ("Engineering Report") not later than 45 days following completion of field investigations/sampling.

Please contact Mr. Tim Gordon, of my staff, at (212) 637-4167 if there are any questions.

Sincerely yours,

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

cc: Commander L.V. Marchette, NAVSTA Roosevelt Roads
P.A. Rakowski, P.E., LANTDIV ✓
Carl A. Soderberg, 2EPA-CFO
Israel Torres, PREQB
Art Wells, LANTDIV