



DEPARTMENT OF THE NAVY  
COMMANDING OFFICER  
PSC 1008, BOX 3021  
U. S. NAVAL STATION ROOSEVELT ROADS  
FPO AA 34051-3021

N40003.AR.000456  
PUERTO RICO NA  
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Ser N02C-B14/ 4637

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U.S. Environmental Protection Agency  
Region II  
Attn: Mr. Raymond Basso  
290 Broadway, 22<sup>nd</sup> Floor  
New York, NY 10007-1866

Gentlemen:

This letter is in response to your letter of December 13, 1996, regarding Tow Way Fuel Farm, Solid Waste Management Unit (SWMU) #7. Our response to your requests follows the same order as in your letter.

EPA request: Copy of the Alternative A plan for 7 new and one existing wells proposed as free product recovery wells mentioned in the monthly report transmitted in our letter of November 29, 1996. This plan apparently differs from the proposed plan in the letter of September 27, 1996.

Navy response: As discussed during our telephone conversation between Mr. Tim Gordon, of your office; and Mr. Chris Penny and Mr. Pedro Ruiz, from the Navy, on December 18, 1996, the Alternative A mentioned in the monthly report is the same as the proposed in our letter of September 27, 1996. The apparent difference is due to the language used to describe the proposed plan for contractual purposes. The enclosed drawing was used to locate the recovery wells. As built drawings will be provided to your office as part of the close-out report for this project once available from the construction contractor.

EPA request: The October monthly report submitted on November 29, 1996 does not address the current status of on-going product recovery operations. The report must indicate if operations are suspended, date of suspension, and provide cumulative volume of recovered product (since initiation of recovery) as of the suspension date.

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Navy response: Part of this information was addressed in our letter of October 30, 1996. As discussed during the telephone conversation on December 18, 1996, the product recovery operation was suspended on September 30, 1996 when the contract with Terra Vac Inc. expired. The recovery operation was suspended so that construction of the new proposed system could commence. Currently the new system is in process of being commissioned before the Operation and Maintenance (O&M) is initiated as proposed in the letter of September 27, 1996. In reference to the free product recovered, the total cumulative volume amounts to 13,773 gallons. This effort covers the period from February 1994 through September 1996.

Also discussed and agreed upon during the referenced telephone conversation was to eliminate the monthly reports. Status of operations at the Tow Way will be submitted on the quarterly reports required by Condition B.8 of Module III of the November 1994 Resource Conservation and Recovery Act/Hazardous and Solid Waste Amendment (RCRA/HSWA) Operating Permit. Additionally, every other quarter, an analysis of the data and operation of the recovery system will be included as part of the quarterly report. This effort will provide a better understanding of the operation of the system installed.

As addressed in previous correspondence, we welcome and encourage any comments which will improve our effort to clean this and other sites in an efficient and responsible matter.

If you have any questions, please contact Mr. Pedro Ruiz, at (787)865-4429, or Mr. Christopher Penny, at (757)322-4815.

Sincerely,



S. CASTILLO  
Director, Environmental  
Engineering Division  
Public Works Department  
By direction of the  
Commanding Officer

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Encl:

(1) Proposed LNAPL Recovery Well Locations

Copy to:

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

Environmental Quality Board

Attn: Mr. Israel Torres

Land Pollution Control

RCRA Section

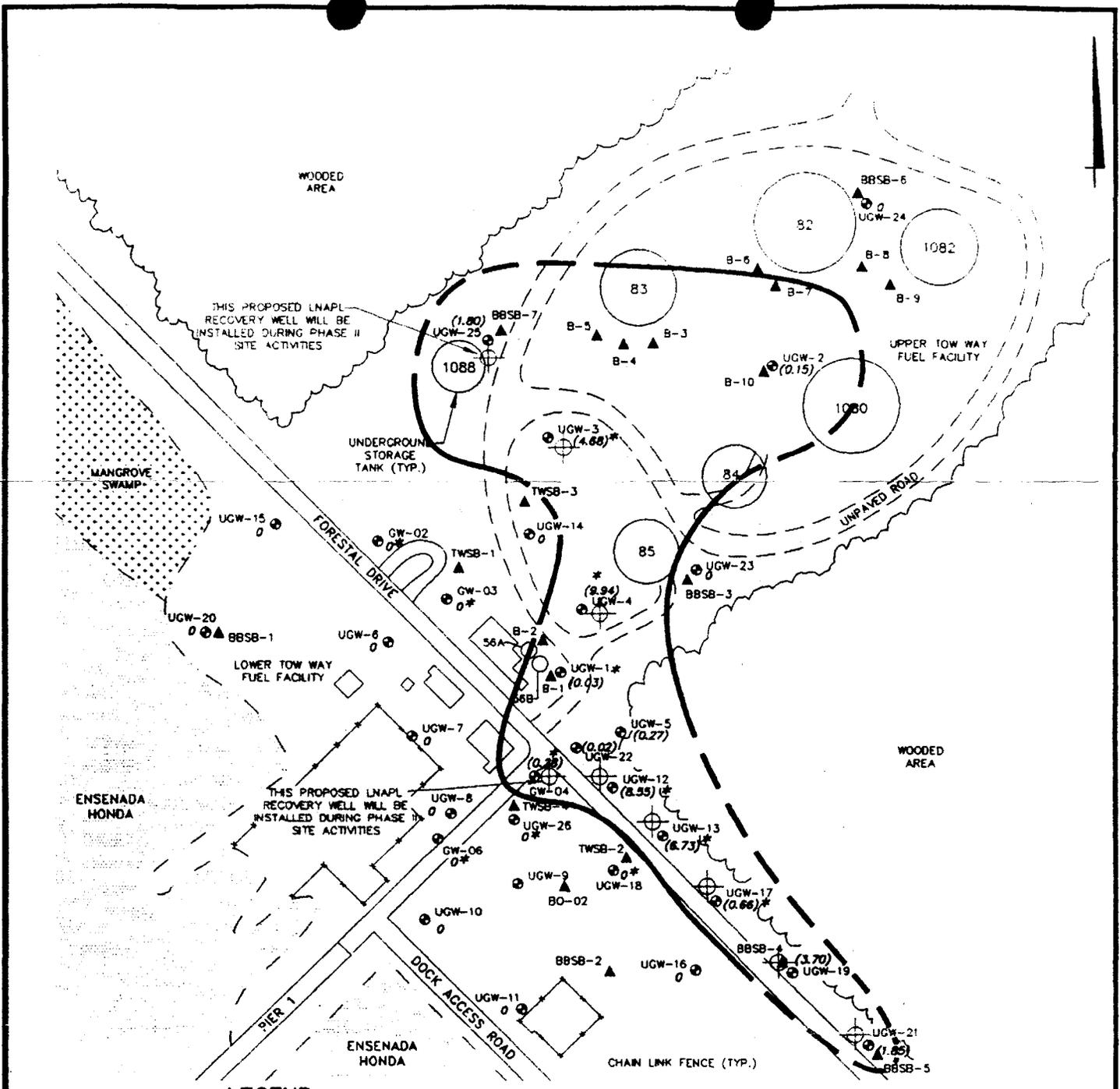
P.O. Box 11488

Santurce, PR 00910

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 1822 (C. Penny)  
1510 Gilbert Street  
Norfolk, VA 23511-2699

Baker Environmental, Inc.  
Attn: Mr. Tom Fuller  
Airport Office Park, Building 3  
420 Rouser Road  
Coraopolis, Pennsylvania 15108

Commander in Chief  
U.S. Atlantic Fleet  
Code N465  
Norfolk, VA 23511

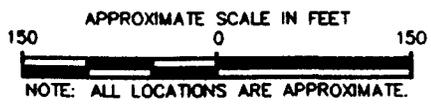


**LEGEND**

- ⊙ MONITORING WELL
- ▲ SOIL BORING
- (0.07) APPARENT LNAPL THICKNESS IN FEET (8/13/96)
- \* WELL SCREENED INTERVAL BELOW POTENTIOMETRIC SURFACE OR UNKNOWN
- LNAPL EXTENT (APPROX.) DASHED WHERE INFERRED
- ⊕ PROPOSED LNAPL RECOVERY WELL LOCATIONS

Roosevelt Roads U.S. Naval Station  
TOW WAY FUEL FACILITY  
CEIBA, PUERTO RICO

**PROPOSED LNAPL RECOVERY WELL LOCATIONS**



DEPARTMENT OF THE NAVY  
ATLANTIC DIVISION

BLAISLAND, BOUCK & LEE, INC.  
engineers & scientists

FIGURE  
**3**

L: P-LNAPL P-WELLS  
P: APX  
9/28/98 5YR-54-POL  
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