



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

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PURERTO RICO NA

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JAN 19 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

K.W. Martello, Captain, U.S. Navy  
Commanding Officer  
U.S. Naval Station Roosevelt Roads  
TSC 1008 Box 3001  
Code NO  
FPO AA 34051-3001

Re: RCRA Facility Investigation (RFI) - Tow Way Fuel Farm (SWMUs #7 and #8) revised Work Plan Addendum 1, and Data Validation Procedures, RCRA/HSWA Permit No. PR2170027203

Dear Captain Martello:

Tow Way Fuel Farm RFI Work Plan Addendum 1

The United States Environmental Protection Agency (EPA) Region II has reviewed the Tow Way Fuel Farm (SWMUs #7 and #8) revised Work Plan Addendum 1, transmitted by Baker Environmental, Inc. on January 3, 1996 on behalf of the Navy. EPA has the following comments:

1. The second paragraph of Section 2.1.1.1 (page 4) describing the deep boring program should be modified to indicate that the borings will be continued from auger refusal to either a point 25 feet into competent rock or a minimum 10 feet below the water table, whichever is deeper. This condition is needed to insure that, should a boring encounter competent rock significantly above the water table, as indicated for wells UGW-23 and UGW-24 (reference Cross Section A-A'/Figure 2-1 of the April 1994 Site Characterization Report, by Blasland, Bouck & Lee, Inc.), the boring will in fact be continued to penetrate sufficient saturated formation thickness to allow for implementation of rising head slug tests, as proposed, in the two inch wells to be installed in all four deep borings.
2. In Section 2.1.2 describing the Shallow boring program, Part 1 (page 7) should clearly indicate that the samples discussed in this part are for subsurface soil samples above the water table. Also, the expected depth to the top of the water table should be given.

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3. Table 1 (page 6) needs to list the 7 surface soil samples described in Section 2.2 (page 8). Also, Table 1 should be modified so that the two listings for subsurface soil samples for SWMU #8 are annotated to indicate those for the 7 test pits (21 samples) and those from the 3 "trenches" (18 samples).

4. Section 3.0 (page 12) should give specific dimensions for the 7 proposed test pits (as distinct from the 3 test trenches). EPA recommends a minimum of 10 feet long by approximately 4 feet wide.

5. In addition to the reports listed in Figure 3, the schedule for Operable Unit 2 (SWMUs 7, 8, & 9), please note that Quarterly RFI Progress Reports are required pursuant to condition B.8 of Module III of the 1994 Final RCRA/HSWA permit.

#### Data Validation Procedures

EPA has reviewed the letter of December 6, 1995 from Mr. S. Castillo (Director, Environmental Engineering Division, Public Works Department, NAVSTA Roosevelt Roads) regarding the data validation procedures to be utilized in conjunction with all RFI sampling. EPA approves the proposal contained in that letter, to validate the RFI data in accordance with the five Region II Standard Operating Procedures (SOPs), previously transmitted to Mr. Art Wells of LANTDIV by copy of my letter of October 17, 1995 to you.

EPA requests that within 25 calendar days of your receipt of this letter the Navy submit either the complete Addendum 1 for the Tow Way Fuel Farm RFI as revised, or only those pages/table/figures revised (though EPA recommends the full Addendum) to address the above comments.

Also, as previously requested, please advise EPA (verbally, to be followed by written confirmation) at least 20 days prior to commencement of any field investigation activities pursuant to the approved RFI work plans. 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 S.J. Pena, NAVSTA Roosevelt Roads  
Israel Torres, PREQB  
Art Wells, LANTDIV Code 1823