



DEPARTMENT OF THE NAVY
U.S. NAVAL STATION, ROOSEVELT ROADS
PSC 1008, BOX 3001
FPO AA 34061

5090
Ser N02C-B14/1414
1 May 96

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, 22nd 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. The enclosed chart provides the chronology of events for the Tow Way Fuel Farm for your reference.

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

Navy's 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's request: Explanation why recommendation to recover free product at UGW-25 has not been implemented.

5090

Ser NO2C-B14/1414

1 May 96

Navy's 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 locations 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) for the ICM 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's 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 replace 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 all free product in wells and agree that the highest priority should be those areas with the greatest amount.

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

5090

Ser NO2C-B14/1414

1 May 96

Navy's reply: 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, we have not implemented the CAP and P&S for the approved CAP will be forwarded to your office in May 1996.

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

Navy's reply: We believe that it may 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 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's 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 their use, if necessary.

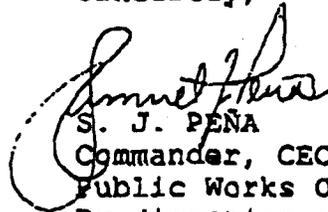
From the concerns raised in your letter, it appears that we have not clearly communicated to you that we have not yet begun the ICM under the approved CAP. Our efforts to date are a result of the UST program targeted to prevent migration of the free product. As stated earlier, we plan to end operation of the emergency response system by September 1996 when the new system will start.

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

5090
Ser NO2C-B14/1414
1 May 96

Should you have any questions, please contact Mr. Pedro Ruiz,
Pollution Abatement Program Manager, Environmental Engineering
Division, at (787) 865-4429.

Sincerely,



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

Encl:
(1) Chronology of Events
for Tow Way Fuel Farm
(SWMU #7)

Copy to:
Environmental Quality Board
Attn: Mr. Israel Torres
Land Pollution Control
RCRA Section
P.O. Box 11488
Santurce, PR 00910

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CHRONOLOGY OF EVENTS FOR TOW WAY FUEL FARM (SWMU #7)

- September 1984- Initial Assessment Study by the Navy identifies Tow Way Fuel Farm (TWFF) as a potential contaminated site.
- December 1988- EPA promulgates UST regulation 40 CFR 280.
- December 1990- Puerto Rico promulgates its own UST regulation.
Being a UST site, TWFF is transferred to the UST program by the Navy.
- February 1992- Site Characterization under UST program confirmed contamination of petroleum at TWFF.
- June 1993- EPA Region II conducts inspection at NAVSTA, Roosevelt Roads including all Installation Restoration sites.
- September 1993- Navy awards emergency response contract to Terra Vac.
- January 1994- The Navy requests EPA, Region II to maintain Tow Way Fuel Farm under the UST program.
- April 1994- Second Site Characterization defines the extend of contamination of the TWFF.
Emergency response contract still operating.
- September 1994- EQB approves CAP for Tow Way Fuel Farm.
EPA denies Navy request to exempt TWFF from permit.
- October 20, 1994- EPA, Region II issued final RCRA/HSWA permit.
- November 28, 1994- RCRA/HSWA Part B Permit becomes effective. All SWMU are in permit (including TWFF).
Emergency response contract still operating.
- January 1995- Navy awards contract to prepare Plans and Specifications (P&S) to implement ICM at TWFF.
- May 1996- Navy will submit P&S to EPA, Region II ..
- September 1996- Anticipated completion of emergency response contract.
Navy anticipates start-up of ICM.