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02 MAY 1997

U.S. Environmental Protection Agency
Region II
Attn: Ms. Nicoletta DiForte, Chief
Caribbean Section RCRA Programs Branch
290 Broadway, 22nd Floor
New York, New York 10007-1866

Re: U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico
Draft RCRA Facility Investigation Report for
OU 2 EPA Comment Letter of March 4, 1997

Dear Ms. DiForte:

This letter is in response to your correspondence dated March 4, 1997, addressed to Commander S. J. Pena, CEC, U.S. Navy Public Works Officer, U.S. Naval Station, Roosevelt Roads, Puerto Rico. The subject letter was in regard to the September 1996 Draft RCRA Facility Investigation (RFI) Report-Operable Unit 2 (OU 2), transmitted on behalf of the Navy by Baker Environmental, Inc. The Department of the Navy has reviewed EPA comments and share the same concerns. Accordingly, the Navy has been involved in restructuring the management and approach of the Tow Way Fuel Farm in order to enhance continuity among the various investigations and clean up efforts. The Navy will advise your office of the details in management changes as they become finalized in the near future. However, the Navy would like to take this opportunity to convey our efforts and proposals toward revising the RFI Report so that your comments can be addressed appropriately in the revised reports.

SWMU # 7 and # 8 (SWMU7/8)

Because the area of SWMU Number 8 is contiguous with the area of SWMU Number 7, the Department of the Navy agrees with the EPA that a overall site wide characterization of all vadose zone soils and groundwater within the Tow Way Fuel Farm is technically warranted. Therefore, the Department of the Navy is in the process of performing an integrated site characterization of all SWMU Number 7 and SWMU Number 8 area vadose zone soils and groundwater. All available data, including all past data incorporated in the 1994 Site Characterization report, and any other historical

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data available on the Tow Way Fuel Farm will be condensed into one report, SWMU 7/8. However, more effort than was originally anticipated is required to coordinate and gather data from previous reports from other contractors and integration of this data into one report. Therefore, as discussed and confirmed with Mr. Tim Gordon of your staff, the Navy will be submitting the revised report for SWMU 7/8 OU-2 to your office no later than June 16, 1997. Also, if there are no objections, the Navy will revise the title nomenclature of this report to read "RCRA Facility Investigation Report for Operable Unit 2 (SWMU Numbers 7/8) Naval Station Roosevelt Roads Ceiba, Puerto Rico.

SWMU # 9

Since the arial extent of SWMU Number 9 is not contiguous with SWMU Numbers 7/8 of the Tow Way Fuel Farm and that the schedule of work associated with SWMU Number 9 differs from SWMU Numbers 7/8 , the Navy requests that EPA consider separating this report section from the original RCRA RFI OU-2 Report and viewing it entirely as a separate RFI investigation from this time forward. If there are no objections, the Navy will proceed forward and develop a separate RCRA RFI Report for SWMU Number 9.

The Navy concurs with EPA in that additional investigations are warranted for SWMU 9. The Navy is currently in the process of developing the necessary work plan addendum. The work plan addendum will be submitted to your office for review no later than May 15, 1997. A performance schedule depicting the critical milestones which follow the work plan submission date will also be provided..

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Please do not hesitate to call me at (757) 322-4815 or Ms. Madeline Rivera at (787) 865-4429, if you have any questions or desire to discuss any of the points raised in further detail.

Sincerely,

C. T. PENNY
Navy Technical Representative
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

NSRR (Ms. Madeline Rivera)
Baker Environmental, Inc., (Mr. Thomas Fuller)
PR EQB (Mr Israel Torres)

Blind copy to:

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