

MEETING AGENDA

Location of Meeting: U.S. EPA Region II
26 Federal Plaza
New York, NY

Date of Meeting: December 22, 1993; 10:00 a.m.

Subject of Meeting: Inclusion of the Tow Way Fuel Farm (UST Site)
under RCRA Corrective Action
Naval Station Roosevelt Roads, PR

Attendees:

<u>U.S. EPA Region II</u>	<u>Atlantic Division, NAVFAC</u>
Andrew Bellina	Paul Rakowski
Barry Tornick	John Kresky
Tim Gordon	James Szykman

Agenda:

- Introduction
- Underground Storage Tank Regulation, PR-EQB
- Work at Tow Way Fuel Farm
 - Past, Present, and Future
- Impacts of bringing UST Site into RCRA Corrective Action
 - Procedural
 - Risk and Remediation
 - Schedule
 - Cost
 - Overall
- Discussion
 - Clarification of Proposed Rule on the Exemption of Petroleum Contaminated Media & Debris from UST from RCRA Hazardous Waste Requirements
 - Effects on the remainder of the UST Program
 - EPA Region II's view/response
 - Alternatives/Summary

Underground Storage Tank Control Regulation Commonwealth Of Puerto Rico, Office of the Governor Environmental Quality Board Water Quality Area, November 7, 1990

Adopted from 40 CFR § 280 and 281 almost verbatim.

<u>40 CFR</u>	<u>Section EQB Rule</u>	<u>Description</u>
280.10	103	Applicability
280.50	501	Reporting of suspected releases
280.60	601	General
280.61	602	Initial Response
280.62	603	Initial Abatement Measures and Site Check
280.63	604	Initial Site Characterization
280.64	605	Free Product Removal
280.65	606	Investigations for Soil & Groundwater Cleanup
280.66	607	Corrective Action Plan

PAST, PRESENT, AND FUTURE WORK UNDER THE UNDERGROUND STORAGE TANK PROGRAM

PAST

- Installed 17 monitoring wells and sampled for BTEX, TPH, and Metals completed in 1992 by O'Brien & Gere.
- Additional data needs identified by Law Environmental in Draft Corrective Action Plan (CAP), October 1993.

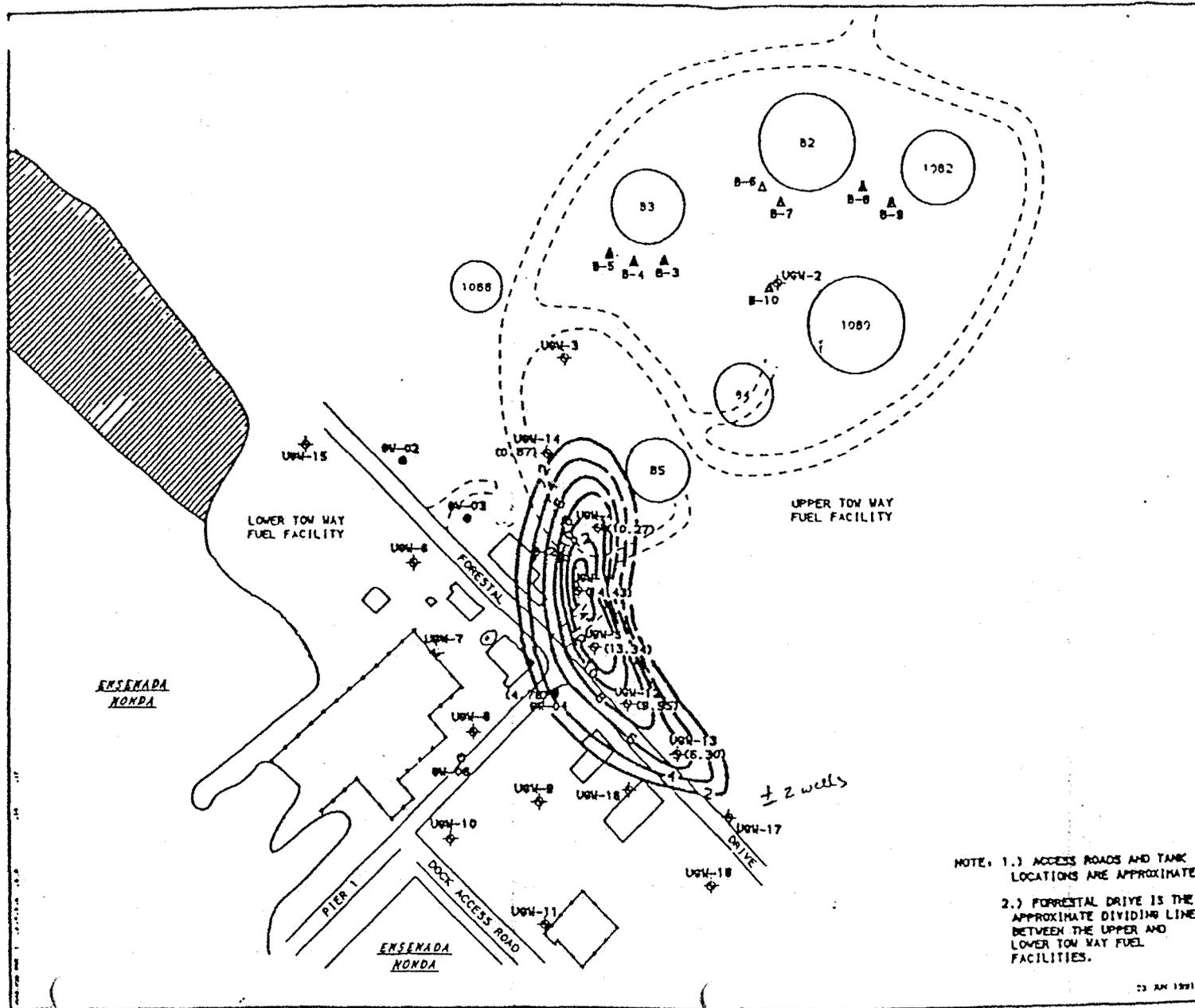
PRESENT

- Contracted with Blasland Bouck and Lee to provide additional data needs identified in Draft CAP.
- Contracted with Terra Vac to setup and operate free product recovery system (presently operating) and storage, transportation, and disposal of free product.

FUTURE

- Draft Site Characterization Report due February 15, 1994
- Interim Action of Free Product Removal to continue under contract to Terra Vac.
- Full Scale free product removal system to be designed and constructed in FY 95.
- CAP will be re-evaluated to address remaining soil and groundwater contamination once free product removal has reached its maximum practical endpoint. Any further remediation will be based on a quantitative risk assessment and subject to EQB regulatory approval.

FIGURE 5
 TOV WAY FUEL FARM
 U.S. NAVAL STATION
 ROOSEVELT ROADS, PUERTO RICO



LEGEND

- ◆ MONITORING WELL LOCATION
- ▲ BORING LOCATION
- OLD MONITORING WELL LOCATION
- - - PRODUCT THICKNESS CONTOUR (DASHED WHERE INFERRED)
- 08.300 PRODUCT THICKNESS
- - - ACCESS ROAD
- ▨ MANGROVE SWAMP

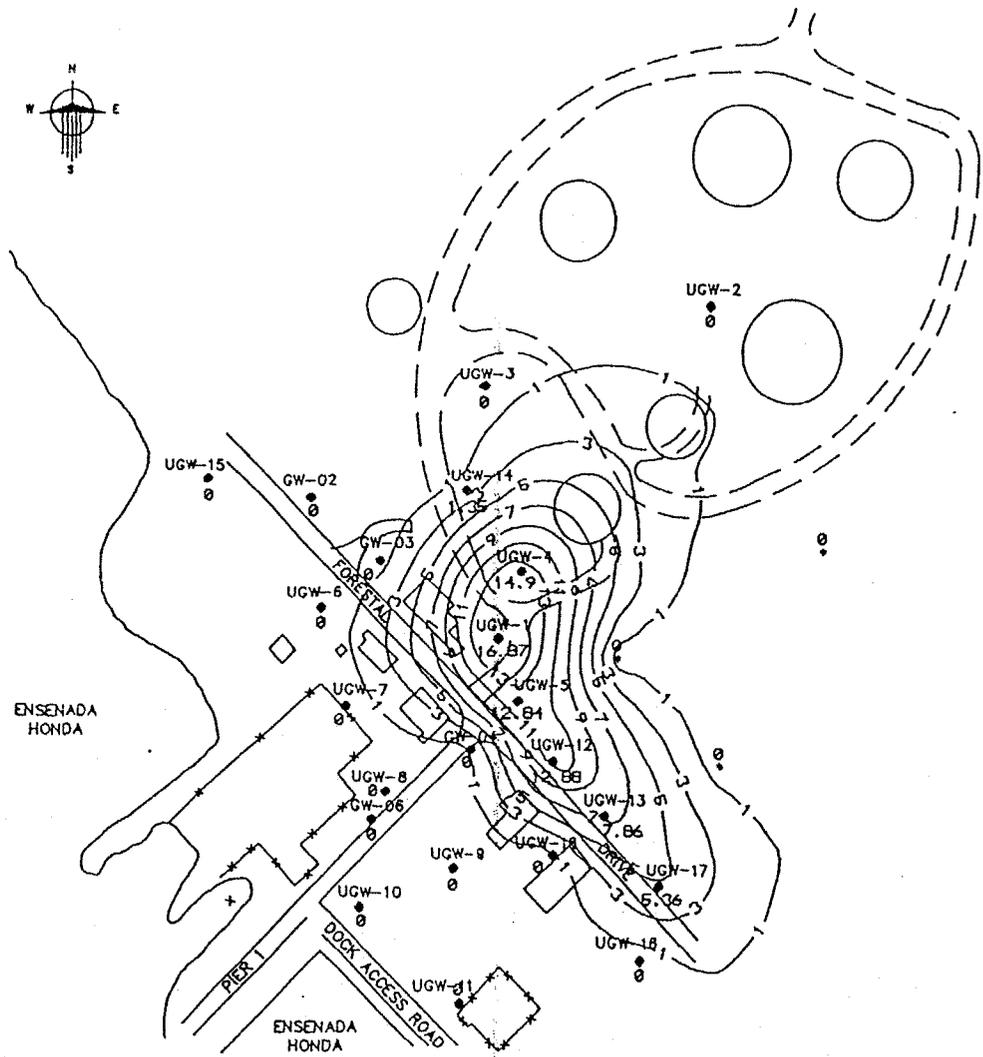
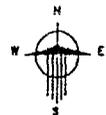
FREE PRODUCT PLUME MAP
 (3/29/91)



NOTE: 1.) ACCESS ROADS AND TANK LOCATIONS ARE APPROXIMATE
 2.) FORRESTAL DRIVE IS THE APPROXIMATE DIVIDING LINE BETWEEN THE UPPER AND LOWER TOV WAY FUEL FACILITIES.

4718.005.390

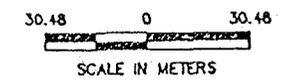




DRAFT

- LEGEND:**
- UGW-18 ● MONITORING WELLS
 - - - PRODUCT THICKNESS

- NOTE:**
1. ACCESS ROADS AND TANKS LOCATION ARE APPROXIMATE
 2. CONTOUR INTERVAL 2 FT.



DRAWN: J.R.R.	CHECKED: V.F./ E.A.	PRINCIPAL REV: R.C.	FILE NAME: P121292.DWG
U.S. NAVAL STATION ROOSEVELT ROADS FACILITY TOW WAY FUEL FARM SAMPLING PLAN CEIBA, PUERTO RICO		 LAW ENVIRONMENTAL - CARIBE CASO BUILDING, SUITE 603 1225 PONCE DE LEON AVENUE SANTURCE, PUERTO RICO 00907 (809) 722-7740	FREE PRODUCT THICKNESS MAP (DECEMBER 11, 1992) PROJECT NO. 54-2578

BASE MAP SOURCE: O'BRIEN AND GERE, 1990
 GRIDING ALGORITHM: KRIGING (SURFER PACKAGE)

FIGURE 14

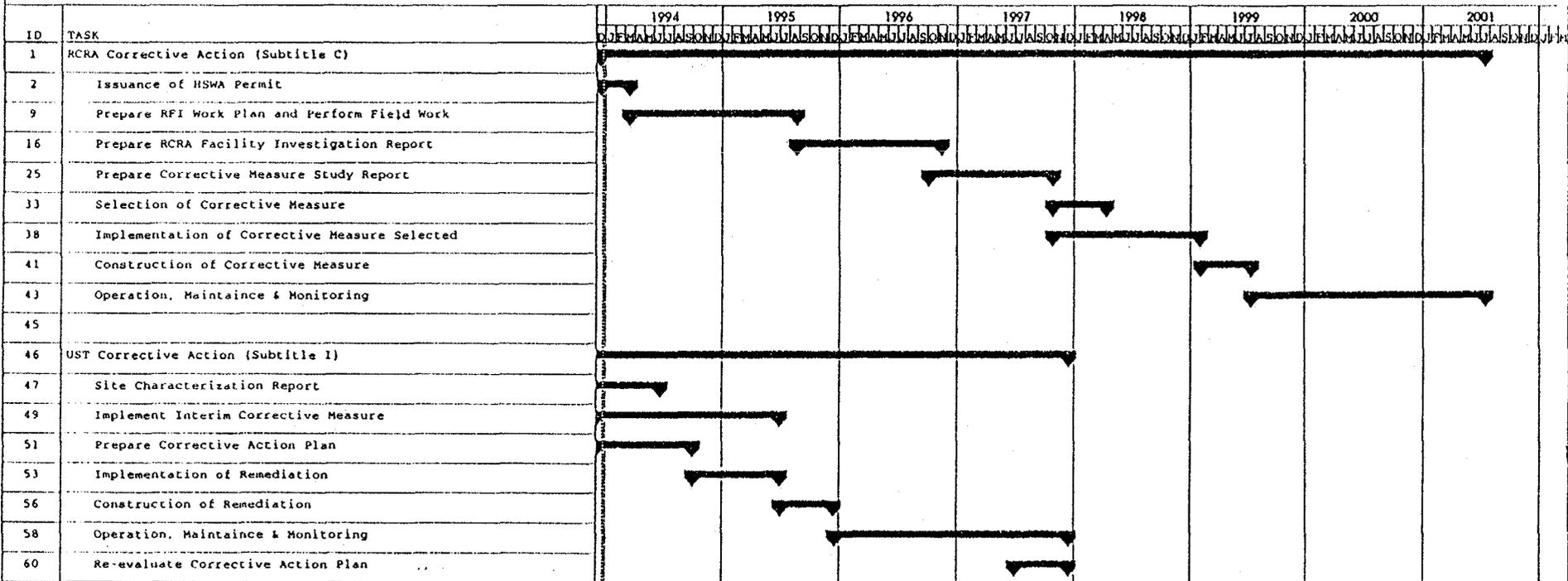
PROCEDURAL IMPACTS:

- Acceptance of all work performed under the UST program; Site Characterization Report will be final at the same time the permit becomes final.
- Coordination of EPA and EQB on both programs (UST and RCRA Corrective Action) must be done by the either EPA or EQB to avoid program conflicts.
- Underground Storage Tank Control Regulations for The Commonwealth of Puerto Rico have Primacy.
- Must satisfy the requirements of both programs which achieve the same result with different approaches.
- On-site treatment would require Class 2 permit modification.
- Investigation and Corrective Action Plan performed concurrently under UST where the RFI and CMS are performed consecutively under RCRA Corrective Action.

RISK AND REMEDIATION IMPACTS:

- Time delays caused by compliance with subtitle C requirements will increase environmental risk by delaying final cleanup.
- Required to shutdown interim system while completing administrative requirements (i.e. additional testing and reporting) under RCRA Corrective Action?
- No RCRA permitted TSD facilities in The Commonwealth of Puerto Rico (Free Product Removal presently being recycled through a Puerto Rico Refinery).
- Fuel would become a Hazardous Waste at no benefit to site remediation.
- Use of on-site innovative technologies inhibited by LDRs and 90 day rule.
- Delay in Corrective Measure Implementation;
FY-95 for subtitle I vs. FY-98 for subtitle C.

Subtitle C Corrective Action vs. UST Corrective Action



Project:
Date: 21/12/93

Critical [Pattern]
Noncritical [Pattern]

Progress [Line]
Milestone [Diamond]

Summary [Line]
Rolled Up [Diamond]

COST IMPACTS:

- Cost savings from the exemption would be lost; management of the media as a Hazardous Waste increase clean-up cost (2 to 15 times).
- Use of on-site innovative technologies inhibited by LDRs and 90 day rule.
- No RCRA permitted TSD facilities in The Commonwealth of Puerto Rico.
- Acceptance of all work performed under the UST program; Site Characterization Report will be final at the same time the permit becomes final.
- Additional monitoring required for a known UST Site (Appendix IX vs. BETX, TPH, and Metals).

OVERALL IMPACT:

- Overall cost to implement the program is dramatically increased.
- Overall time to achieve final corrective action is dramatically increased.
- Potential to increase risk to human health and the environment.
- Inconsistent with the remainder of the 50 plus UST sites at Roosevelt Roads.
- Limits Naval Station's Commanding Officers options to comply with the U.S. District Court judgement directing Naval Station to expeditiously take action to prevent the contamination from the Tow Way Fuel Farm from entering the sewer line which passes near the lower edge of the plume.
- Appearance that the EQB UST program is not adequate to address this problem.
- EPA Region II already involved in Subtitle I oversight (Multi-media inspection October 1992).

DISCUSSION:

- Clarification of Proposed Rule on the Exemption of Petroleum Contaminated Media & Debris from UST form RCRA Hazardous Waste Requirements.
- Effects on the remainder of the UST Program.
- EPA Region II's view/response.
- Alternatives/Summary.