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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 21 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Christopher Penny
Navy Technical Representative
Installation Restoration Section (South)
Environmental Program Branch
Environmental Division,
Atlantic Division (LANTDIV), Code 182
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Re: Naval Station Roosevelt Roads - EPA I.D. Number PRD2170027203

1. Draft RFI Work Plan for SWMUs #53 and #54
2. Tow Way Fuel Farm Additional Data Collection and Ecological Risk Assessment Work Plans

Dear Mr. Penny:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of: 1) the Draft RFI Work Plan for SWMUs #53 and #54, as well as the revised portions of the April 11, 2001 Draft Sampling And Analysis Report for SWMUs #53 and #54, submitted on the Navy's behalf by Baker Environmental Inc's [Mr. Mark E. Kimes'] letter of August 27, 2001; and 2) the Tow Way Fuel Farm Additional Data Collection Work Plan and Ecological Risk Assessment Work Plan [Appendix C of the Additional Data Collection Work Plan] submitted on the Navy's behalf by Baker Environmental Inc's letter of September 26, 2001, and modified by the enclosures submitted with Baker Environmental Inc's letter of November 2, 2001. These documents were submitted pursuant to corrective action requirements of the 1994 RCRA Final Permit for Naval Station Roosevelt Roads.

Draft RFI Work Plan for SWMUs #53 and #54

The Draft RFI Work Plan for SWMUs #53 and #54, and the revised portions of the April 11, 2001 Draft Sampling And Analysis Report for SWMUs #53 and #54 were submitted by Baker Environmental Inc's letter of August 27, 2001 in response to EPA's comment letter of July 5, 2001.

EPA approves the revised portions of the Sampling And Analysis Report for SWMUs #53 and #54, and, with one exception, the Draft RFI Work Plan for SWMUs #53 and #54. That exception is as follows. Section 3.1 of the Draft RFI Work Plan, indicates that surface and subsurface soil samples at SWMU #53 will be field screened for lead and DDT and that a minimum of ten percent of those surface and subsurface soil samples will then submitted for confirmatory laboratory analysis. Ten percent of the 14 surface and 14 subsurface soil samples corresponds to 1.4 samples each. Likewise, if the ten percent figure is applied to the sum total of surface and subsurface soil samples (28), only 3 samples would have to be submitted for confirmatory laboratory analysis. That is not sufficient. EPA requests that the Draft RFI Work Plan be modified to have 3 surface soil samples and 3 subsurface soil samples from SWMU #53 (total of 6 samples) be submitted for confirmatory laboratory analysis for lead and DDT. Accordingly, within 21 days of your receipt of this letter, please submit an addendum to the August 27 RFI Work Plan to reflect this revision. If the submitted addendum acceptably reflects the above revision, the RFI Work Plan for SWMUs #53 and #54 will be acceptable.

Tow Way Fuel Farm Additional Data Collection and Ecological Risk Assessment Work Plans

EPA has completed its review of the Tow Way Fuel Farm Additional Data Collection Work Plan and Ecological Risk Assessment (ERA) Work Plan [Appendix C of the Additional Data Collection Work Plan] submitted on behalf of the Navy by Baker Environmental Inc's [Mr. Mark E. Kimes'] letter of September 26, 2001. Based on Mr. Tim Gordon's [of my staff] Email of October 12, 2001 to Mr. Kevin Cloe [of Atlantic Division, Naval Facilities Engineering Command] and yourself, certain revisions to the September 26th submittal were requested. A copy of EPA's Email of October 12, 2001 and its attachment [Technical Review dated October 10, 2001] is enclosed. Acceptable revisions to address EPA's October 12th Email were submitted on behalf of the Navy by Baker Environmental Inc's [Mr. Mark E. Kimes'] letter of November 2, 2001. Therefore, EPA approves the Additional Data Collection and ERA work plans, as modified by the enclosures submitted with the November 2, 2001 letter.

Schedules

As has been indicated in Mr. Kevin Cloe's [of Atlantic Division, Naval Facilities Engineering Command] Email of October 17, 2001 to Mr. Tim Gordon, funding to implement the above work plans is not yet available. Therefore, implementation may be delayed from the schedules given in Figure 6-1 of the SWMU 53 and 54 RFI Work Plan and Figure 5-1 of the Tow Way Fuel Farm Additional Data Collection Work Plan. Accordingly, within 21 days of your receipt of this letter please submit up-dated schedules, based on the funding authorized at that point, for implementing the SWMU 53 and 54 RFI Work Plan and the Tow Way Fuel Farm Additional Data Collection and ERA Work Plans, along with the revised portions of the SWMU #53 and #54 RFI Work Plan, as discussed previously.

If you have any questions, please contact Mr. Gordon, at (212) 637- 4167.

Sincerely,



Nicoletta DiForte, Chief
Caribbean Section
RCRA Programs Branch

Enclosure

cc: Mr. Carmelo Vasquez, P.R. Environmental Quality Board, w. encl.
Ms. Madeline Rivera, Public Works Department, Naval Station Roosevelt Roads, w. encl.
Kevin Cloe, Environmental Division, Atlantic Division (LANTDIV), Naval Facilities
Engineering Command, w/o encl.
Ms. Kathy Rogovin, Booz Allen & Hamilton, w/o encl.
Mr. Mark Kimes, Baker Environmental, w/o encl.
Mr. John Tomik, CH2MHill, w/o encl.