



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAY - 4 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

Dear Mr. Penny:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the following documents submitted pursuant to corrective action requirements of the 1994 RCRA Final Permit for Naval Station Roosevelt Roads:

- 1) Draft Interim Decision Document for SWMU #14, dated November 22, 2000;
- 2) Draft Final CMS Report for SWMU 6/AOC B, dated November 30, 2000;
- 3) Final CMS Work Plan for SWMU #9, dated January 15, 2001;
- 4) Basis of Design and Technical Specifications Corrective Measures Implementation (CMI) Work Plan for SWMU 31/32, dated January 25, 2001;
- 5) Basis of Design and Technical Specifications Corrective Measures Implementation (CMI) Work Plan for SWMU 13 and SWMU 46/AOC C area, dated January 25, 2001;
- 6) Revised Section 3.0 of CMS Task I Report for Tow Way Fuel Farm, dated January 31, 2000;
- 7) Work Plan for Additional Data Collection, Tow Way Fuel Farm, dated January 31, 2000; and

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- 8) Department of the Navy letter of October 19, 2000 regarding CMS Work Plans for SWMUs #1 and #2 and SWMU #45.

EPA has the following comments on the above documents:

1. The Draft Interim Decision Document for SWMU #14, dated November 22, 2000, indicates there are no current unacceptable threats to human health, under current usage of that unit as a fire training facility. Therefore, the Interim Decision Document is approved, and completion of the remaining RFI investigations for this unit and corrective measures, if required, will be suspended until permanent cessation of fire training operations at this unit, or dismantling of the unit. However, as discussed in EPA's letter of July 5, 2000, potential future threats when the unit is removed, and/or for a site land usage different than present usage, have not been fully evaluated. Accordingly, this approval of the Interim Decision Document is based on the recommendations given in Section 4.0 of the Document, that "once fire training operations cease [at this unit], additional site characterization of the site will be conducted..[and].. If it is [then] determined that an unacceptable risk is present the [SWMU 14] area would be remediated as appropriate," being acceptably implemented upon permanent cessation of fire training operations at this unit, or dismantling of the unit.
2. The Draft Final CMS Report for SWMU 6/AOC B, dated November 30, 2000, is not fully acceptable as completing the CMS stage for these two units. The reason is that the recommendation, given in Section 4.0 of the CMS Report, that no remedial action is required because of "the upgrade to the site" is not sufficient to justify a no remedial action decision. This is because: a) removal of and/or covering of arsenic and DDT contaminated soils are necessary to eliminate possible future unacceptable risks to young children under a residential usage scenario, even if it is implemented as part of "the upgrade to the site," and b) the details of how and when the contaminated media will be removed and/or covered of as part of "the upgrade to the site" are not given. Therefore, Section 4.0 of the CMS Report must be revised to either reflect that removal of and/or covering of contaminated media is required to eliminate potential unacceptable risks, even if it is part of "the upgrade to the site," or that institutional controls will be required to prevent future usage of the site for residential, child-care, or school facilities. Within 45 days of your receipt of this letter, please submit a revised Section 4.0 of the CMS Final Report to reflect the above. Also, since remedial measures (either removal of and/or covering of contaminated media, or institutional controls) are required, a Corrective Measures Implementation (CMI) work plan must be developed and give relevant details and a schedule for implementation (even if part of "the upgrade to the site"). Upon EPA's receipt and approval of the appropriately revised Section 4.0 of the CMS Report, submission of the CMI work plan will be required. Because either remedial alternative for SWMU

remedial alternative for SWMU 6/AOC B would be relatively straight-forward, EPA is prepared to accept a streamlined CMI work plan.

3. The Final CMS Work Plan for SWMU #9, dated January 15, 2001, acceptably addresses comments given in EPA's letter of December 5, 2000, and is, therefore, approved. If not already commenced as indicated in the schedule given in Figure 7-1 of the work plan, pursuant to Condition III.E.6 of the 1994 RCRA permit, implementation of the CMS Work Plan for this SWMU is to commence within 30 days of your receipt of this letter.
4. EPA approves the Basis of Design and Technical Specifications Corrective Measures Implementation (CMI) Work Plan for SWMU 31/32, dated January 25, 2001, as they acceptably address comments given in EPA's letter of December 5, 2000, which also included comments received from the Puerto Rico Environmental Quality Board (PREQB). The two documents are acceptable as constituting the CMI Work Plan; however, this approval is conditioned on the proposed CMI being public noticed, and any comments received during the public comment period being acceptably addressed. The public notice and public comment on the proposed CMI may be implemented either as a permit modification [to the existing 1994 RCRA Permit], or as part of the public notice and public comment for the renewed RCRA Permit, which is expected to occur in FY'02. Following either of these, EPA will require implementation of the CMI remedy.
5. EPA also approves the Basis of Design and Technical Specifications Corrective Measures Implementation (CMI) Work Plan for SWMU 13 and SWMU 46/AOC C area, dated January 25, 2001. These documents acceptably address comments given in EPA's letter of December 5, 2000, which also included comments received from the PREQB. The two documents are acceptable as constituting the CMI Work Plan; however, this approval is conditioned on the proposed CMI being public noticed, and any comments received during the public comment period, being acceptably addressed. The public notice and public comment on the proposed CMI may be implemented either as a permit modification [to the existing 1994 RCRA Permit], or as part of the public notice and public comment for the renewed RCRA Permit, which is expected to occur in FY'02. Following either of these, EPA will require implementation of the CMI remedy.
6. EPA has two comments on the Revised Section 3.0 of the CMS Task I Report for Tow Way Fuel Farm, dated January 31, 2000. First, Section 3.0 of the Task I report must be revised to indicate that in establishing corrective action objectives (CAOs) either all inorganic analytes detected above their health-based screening levels are included as constituents in setting CAOs, or that all inorganic analytes detected above their health-based screening levels were then screened relative to measured background concentrations in order

to establish the list of constituents included in the CAOs. Secondly, Section 3.0 of the Task I report must contain a discussion of how any land usage controls that are proposed as part of the remedy will be implemented, and include an example of the proposed document which will control/restrict land usage. However, Section 3.0 of the CMS Task I Report for Tow Way Fuel Farm does not need to be re-submitted at this time, but should be appropriately revised and submitted with the full CMS Report, following completion of the Groundwater Modeling project and Additional Data Collection for Tow Way Fuel Farm, which are discussed below.

7. As discussed during the March 28, 2001 conference call between Mr. Tim Gordon, of my staff, EPA's contractor (Booz Allen & Hamilton) and various Navy representatives and consultants, EPA requests that the Work Plan for Additional Data Collection, Tow Way Fuel Farm, dated January 31, 2000, not be implemented until EPA's review of the revised Conceptual Groundwater Model proposal for Tow Way Fuel Farm, in case additional data gaps are identified during development of the Conceptual Groundwater Model. As discussed during the March 28, 2001 conference call, submission of the revised Conceptual Groundwater Model proposal to EPA is due April 27, 2001.
8. The responses transmitted with your Department of the Navy letter of October 19, 2000 acceptably address EPA's comments in our letter of September 15, 2000 on the July 14, 2000 CMS Work Plans for SWMUs #1 and #2 and SWMU #45. The Schedules for the implementing the CMSs at these SWMUs along with your responses regarding a Phase II Screening Level Ecological Risk Assessment, both of which were included with your letter of October 19, 2000, are acceptable. Therefore, the July 14, 2000 CMS Work Plans for SWMUs #1 and #2 and SWMU #45, as modified by your Department of the Navy letter of October 19, 2000, are now complete and acceptable. Pursuant to Condition III.E.6 of the 1994 RCRA permit, implementation of the CMS Work Plans for these three SWMUs is to commence within 30 days of your receipt of this letter.

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

Sincerely,


Raymond Basso, Chief
RCRA Programs Branch

cc: Captain John R. Warnecke, Naval Station Roosevelt Roads
Ms. Madeline Rivera, Public Works Department, Naval Station Roosevelt
Roads
Ms. Aissa Colon, P.R. Environmental Quality Board
Ms. Kathy Rogovin, Booz Allen & Hamilton
Mr. Mark Kimes, Baker Environmental
Mr. John Tomik, CH2MHill