



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Rakowski, P.E., DEE
Head, 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 - 1) Revised Addendum 2 (to September 1995 approved RFI work plans), Additional Investigation Work Plans for certain OU 1, 6, and 7 SWMUs; and

2) Addendum 3 (to September 1995 approved RFI work plans), Additional Investigation Work Plans for SWMU #9.

EPA ID # PR2170027203

Dear Mr. Rakowski:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of 1) the Revised Addendum 2, Additional Investigation Work Plans for certain OU 1, 6, and 7 SWMUs, transmitted on behalf of the Navy by Baker Environmental Inc's letter of June 12, 1997, and 2) Addendum 3, Additional Investigation Work Plans for SWMU #9, transmitted by Baker Environmental on May 15, 1997.

EPA has one comment on the Revised Addendum 2. The language in section 2.3.2 (Additional Investigations for SWMU 26), is not clear as to whether the Navy plans to analyze both surface soils (just below the root zone) and subsurface soils (2.5 feet to 3 feet below surface), or just the subsurface soils. EPA believes the intent was to analyze both surface and subsurface soils at the ten new sampling locations. Subject to the Navy concurring, EPA approves the Revised Addendum 2 work plan as submitted.

Also, EPA approves the Addendum 3 work plan for additional investigations at SWMU #9. EPA further concurs with the Navy's recommendation that the SWMU #9 investigation/corrective action activities be separated from the Operative Unit (OU) 2 SWMUs #7 & #8 at Tow Way Fuel Farm.

Pursuant to the terms of the 1994 RCRA/HSWA permit issued to Roosevelt Roads, the Permittee must commence implementation of the RFI Work Plan within 60 days following written approval of the Plan. This requirement applies to both the Revised Addendum 2 (OU 1, 6, and 7 SWMUs) and Addendum 3 (SWMU #9) work plans, which are hereby approved. EPA notes that the schedule given in Figure 3-1 of Addendum 2 indicates that field investigations are scheduled to commence approximately 15 days from your receipt of the approval. Likewise, Figure 3-1 of Addendum 3 indicates that field activities at SWMU #9 will commence 6 weeks (42 days) following EPA's approval of the work plan. While not required by the permit terms, EPA encourages the Navy to meet these accelerated implementation schedules.

Also pursuant to the terms of the 1994 RCRA/HSWA permit, the draft RFI Final report(s) for both the OU 1, 6, and 7 SWMUs, and SWMU #9 is (are) required to be submitted within 60 calendar days of receipt by the Permittee of validated analytical results. The draft Final report for those OU 1, 6, and 7 SWMUs where additional investigations are being implemented must incorporate previous RFI data at those SWMUs, and may be structured as an Addendum to the original July 1996 draft RFI report for OUS 1, 6, and 7, rather than re-submitting the entire report. Likewise, the draft Final report for the SWMU #9 investigations must incorporate all previous RFI data at that SWMU..

Please telephone Mr. Tim Gordon of my staff at (212) 637-4167 if you have any questions.

Sincerely yours,



Nicoletta DiForte
Chief, Caribbean Section
RCRA Programs Branch

cc: Mr. Israel Torres, PREQB
Ms. Madeline Rivera, NAVSTA Roosevelt Roads
Mr. Christopher Penny, LANTDIV
Mr. Tom Fuller, Baker Environmental