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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

FEB 22 1993

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. P. A. Rakowski, P.E.  
Head  
Environmental Programs Branch  
Environmental Quality Division  
Naval Facilities Engineering Command  
Norfolk, Virginia 23511-6287

Re: NAVSTA Roosevelt Roads - Draft Work Plans for Interim  
Remedial Action at IR Sites 15 and 16

Dear Mr. Rakowski:

The United States Environmental Protection Agency (EPA) Region II has reviewed the Draft Work Plans for Interim Remedial Action at IR Sites 15 and 16, transmitted by your letter of January 12, 1993, and has the following comments:

The method of confirmatory sampling using composited samples introduces risks of skewed results due to imprecise volumetric compositing. Also, the risk of failing to detect "hot spots" is increased, due to the potential skewing of results by imprecise compositing of collected material. In addition the draft work plan does not adequately discuss steps that will be taken in the event exceedances of the derived action levels (10 ppm. divided by the number of samples in the composite) are measured in the composite. Moreover, the methodology of using derived action levels, instead of multiplying the measured concentration of the composite by the number of samples in the composite, and comparing that number to the fixed action level of 10 ppm. may create some confusion as to interpretation of the results.

Since the suspected mode of contamination involved pouring transformer fluids onto the soil, it is not unreasonable to envision discrete "hot spots", extending to subsurface layers. Pursuant to 40 CFR §761.130 (c) the number of samples must be

sufficient to ensure that areas of contamination of a radius of 2 feet or more within the sampling area will be detected. Accordingly, the absence of "hits" (above relevant action levels) in the confirmatory sampling program contained in the draft work plans, will not necessarily conclusively establish the absence of contamination in the subsurface, or the need for subsequent investigation of subsurface layers.

EPA recommends that in order for the confirmatory sampling program to more conclusively establish the absence of contamination in the subsurface beneath the removed soil, at a minimum, samples should be gathered to a depth of approximately 6 inches beneath the base of the removed soil, and analyzed on a discrete basis, at a density of approximately one per every 225 square feet (sample grids 15 feet by 15 feet). Failure to perform minimally acceptable confirmatory sampling, will result in EPA reserving its right to require future investigation of the subsurface layers. EPA strongly recommends that the work plans be revised to incorporate an acceptable confirmatory sampling program, as described above.

EPA also notes that pursuant to 40 CFR §761.125, the excavated areas must be capped with at least 10 inches of clean soil, containing less than 1 ppm PCB.

EPA also notes that the Interim Remedial Action Work Plans only address soil contamination, and do not address other indicated potential PCB contamination at the two sites, including: the building surfaces, concrete pads, the drainage ditches, the cooling water tunnels at site 16, the surface water and sediments, and ground water. This Interim Remedial Action does not represent final clean-up at these two sites, and EPA reserves the right to require future investigations and remediation of other media or areas of potential contamination at these two sites.

Please direct any questions to Mr. Timothy Gordon, of my staff, at (212) 264-9538.

Sincerely yours,

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Andrew Bellina, P.E.  
Chief, Hazardous Waste Facilities Branch

cc: Carl A. Soderberg, EPA-CFO  
Flor del Valle, PREQB  
L.V. Marchette, NAVSTA Roosevelt Roads  
James Szykman, LANTDIV Code 1823 ✓