



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

JAN 3 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin Cloe
Navy Technical Representative
Installation Restoration Section (South)
Environmental Program Branch
Environmental Division
Atlantic Division (LANTDIV), Code EV23KC
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. Additional Data Collection Work Plan for Tow Way Fuel Farm
3. Draft RFI Work Plan for SWMU #3.

Dear Mr. Cloe:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the revised portions of the Draft RFI Work Plan for SWMUs #53 and #54, and the revised Corrective Measures Schedule (Figure 5-1) for the Additional Data Collection Work Plan for Tow Way Fuel Farm. Both were submitted on the Navy's behalf by Baker Environmental Inc's letters of December 6, 2001. EPA has also completed its review of the Draft RFI Work Plan for SWMU #3, submitted on the Navy's behalf by Baker Environmental Inc's letter of December 17, 2001. These documents were submitted pursuant to corrective action requirements of the 1994 RCRA Final Permit for Naval Station Roosevelt Roads.

RFI Work Plan for SWMUs #53 and #54

With the submission of the acceptable revised portions of the Draft RFI Work Plan for SWMUs #53 and #54 to address comments given in EPA's letter of November 21, 2001, the work plan is approved. Implementation is to commence pursuant to the schedule given in Figure 6-1 included with the December 6th letter.

Additional Data Collection Work Plan for Tow Way Fuel Farm

EPA had previously approved the Additional Data Collection Work Plan for Tow Way Fuel Farm in our November 21st letter, and hereby concurs with the revised Corrective Measures Schedule (Figure 5-1) included with the December 6th letter. Pursuant to that schedule, implementation of the additional data collection activities at Tow Way is to commence in January 2002.

Draft RFI Work Plan for SWMU #3

The Draft RFI Work Plan for SWMU #3 submitted with the December 17th letter is designed to complete the groundwater investigations for that SWMU, which is the base's currently operating solid waste landfill. Previously, other tasks required under the original September 1995 RFI work plan have been implemented, including collection and analysis of 15 shoreline sediment samples around the perimeter of the landfill, and geophysical profiling to delineate the landfill's extent. However, as discussed in the work plan, the required groundwater investigations have not been implemented to date. Under the work plan, groundwater is to be sampled in nine wells for all constituents in 40 CFR Part 264 Appendix IX, plus asbestos and explosives.

A total of 14 explosive constituents are included under Table 3-3 of the work plan, which is labeled as "Appendix IX Compound List". However, these 14 constituents are not included in Appendix IX of 40 CFR Part 264, but appear to be taken from EPA analytical method 8330. To better clarify the list of explosive constituents EPA requests that:

- 1) an additional table [Table 3-4] be submitted for the work plan, listing the explosive constituents to be analyzed;
- 2) for consistency with other investigations, EPA recommends that the table should include all explosive constituents analyzed in the November 1999 Hydrogeologic Investigations for Atlantic Fleet Weapons Facility on Vieques; and
- 3) Table 3-3 should be revised to contain only constituents given in Appendix IX of 40 CFR Part 264.

In addition, Section 5.0 (Reporting) states that the RFI report will include "analytical results for the data collected during this RFI field investigations and the rounds of the groundwater monitoring events and the previous portions of the RFI field investigations." EPA has two comments to better clarify what should be included in the draft RFI Final report; however submission of a revised Section 5.0 of the work plan is not necessarily required:

1) the draft RFI Final report should include all analytical results from the four previous groundwater sampling events (June 1998, February 2000, May 2000, and August 2000) implemented pursuant to the Puerto Rico solid waste requirements; and

2) the draft RFI Final report should include all analytical results as well as a complete discussion and appropriate figures showing the 1996 and 1997 collection and analysis of 15 shoreline sediment samples around the perimeter of the landfill, and a complete discussion and appropriate figures showing the 1997 geophysical profiling to delineate the landfill's extent.

EPA hereby approves the SWMU #3 work plan, contingent on the above comment regarding explosive constituents being acceptably addressed, within 21 days of your receipt of this letter. You do not need to re-submit the entire document; only an additional table [Table 3-4] and revised Table 3-3. Following that submission, implementation of the work plan shall commence pursuant to the schedule given in Figure 6-1 of the work plan.

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

Sincerely yours,



Nicoletta DiForte, Chief
Caribbean Section
RCRA Programs Branch

cc: Mr. Carmelo Vasquez, P.R. Environmental Quality Board, w encl.
Ms. Madeline Rivera, Public Works Department, Naval Station Roosevelt Roads
Christopher Penny, Environmental Division, Atlantic Division (LANTDIV), Naval
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