

757-322-4815

5090
1823:CTP:clm

FEB 19 1999

U.S. Environmental Protection Agency
Region II
Attn: Ms. Nicoletta DiForte
Chief, RCRA Caribbean Section
290 Broadway - 22nd Floor
New York, New York 10007-1866

Re: U.S. Naval Station Roosevelt Roads, Puerto Rico
RCRA Corrective Action Program
RCRA/HSWA Permit No. PR2170027203
Time Extension Request for Revised OU 3/5 RFI Report

Dear Ms. DiForte:

Comments from your office on the Draft OU 3/5 RCRA Facility Investigations (RFI) were received on December 1, 1998. A period of 60 days was allowed to provide responses, which would have made the revised document due at the end of January 1999. The comments have required extensive revisions to the report. Mr. Tim Gordon, of your staff, was contacted prior to the original resubmission date for a time extension. At that time, he verbally approved a 14 working day extension setting the new due date at February 18, 1999. This allowance was greatly appreciated by the Navy. However, that amount of extended time was insufficient to complete the revised report. Therefore, the Navy finds it necessary to request a second time extension.

Since this is the second request for an extension, the Navy believes that some explanation for the delay is offered to support the time request. The following work elements have been completed or are underway to address the comments:

- The entire electronic database had to be reconstructed to include data from three previous investigations. This effort included significant amounts of data input by hand and reworking of the data since the original information was in different formats or was totally unavailable in electronic files. The "new" database was not available for use until February 15, 1999.
- The revised risk assessment, the creation of the isopleth maps, the statistical determination of sample density, and revisions/additions to the report text could not be effectively started without the database (although efforts to accomplish those tasks were expended prior to the database being available in an attempt to meet the scheduled submission date). While attempting to meet the response period, it was discovered that these major revisions caused an unexpected increase in labor and resources.

Re: U.S. Naval Station Roosevelt Roads, Puerto Rico
RCRA Corrective Action Program
RCRA/HSWA Permit No. PR2170027203
Time Extension Request for Revised OU 3/5 RFI Report

- Approximately 40 original drawings had to be completely revised and approximately 69 isopleth maps and a small number of other additional figures had to be produced from the data. The revisions and new drawings represent a 200% increase in effort than was required for the original report. The original document had to be completely revised.
- The Navy realizes that the cost of the report is not a specific concern of the EPA as technical quality and acceptability is but, we feel it important that the EPA understands that this report revision will cost approximately \$40,000 to \$60,000 above the original contracted amount. Because of the cost growth, please be advised that time consuming contractual obligation efforts were required to address the scope increase.

Based on the above, the Navy requests a revised submittal date of March 22, 1999. This is effectively a three working week extension (four calendar weeks) since the week of March 8, 1999 will be spent in Puerto Rico at the Joint Interest Group meeting. We recognize that the overall corrective action schedule is of concern and will make every effort to recover through the aggressive management of investigations and/or reporting for this and other sites at Roosevelt Roads.

Please do not hesitate to call me at (757) 322-4815, if you have any questions or desire further clarification of any of the points discussed in this letter.

Sincerely,

C.T. PENNY
Navy Technical Representative
Installation Restoration Section (South)
Environmental Programs Branch
Environmental Division
by Direction of the Commander

Copy to:

Ms. Madeline Rivera - NAVSTA
Mr. Tim Gordon, US EPA Region II
Mr. Thomas C. Fuller - Baker Environmental, Inc.
Mr. Mark Kimes, Baker Environmental, Inc
Mr. Israel Torres, PREQB
Mr. Doug Dronefield, CH2MHILL-WDC

Blind copy to:
182
~~1823~~ (CP)
18S
ou35-ext.doc