

01.01 - 7/25/91 - 00147

RR-00147
191-7-25-91

Versar INC.

July 25, 1991

Ms. Maritza Montesinos-Gross, Code 1822
Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511-6287

Reference: Versar Contract N62470-90-B-7645 (Versar 5295)

Dear Maritza:

Enclosed you will find 10 copies of the Final Draft Site Summaries for Sites 3, 8, and 9. Also enclosed are 10 copies of the Initial Draft Community Relations Plan for NAVSTA Roosevelt Roads.

The site summaries reflect comments received from the activity. We have addressed all of the activity's specific technical comments; however, two of their general comments that require further explanation have not been addressed in the reports. First, the activity questions whether the data was developed according to suitable CERCLA regulations. Throughout the project, Versar has attempted to locate additional information on the data to no avail. Our scope of work calls for Versar to use the data, as is, in developing the site summaries; to take the data at face value. We feel that the data probably is accurate. However, there is no field QA/QC information, including notebooks or chain of custody to support this position if EPA or EQB were to press the issue (see attached letter). EPA guidance does allow for the use of unvalidated data such as this in scoping and screening; however, the lack of field documentation is still a major problem for these sites.

In response to the second issue: can a position of no further action be defended for the reasons stated in the summaries. All reservations concerning the data aside (that is, assuming the available data is correct) we believe the logic for taking no further action at these sites is sound. However, we do recognize that if EPA or EQB reject the use of the data, it would be necessary to resample to obtain equivalent data to support our conclusions.

Lastly, the CRP is complete except for the two areas I discussed with you on the phone: 1) the activity needs to designate the location of on- and off-activity information repositories; and 2) the community profile section lacks certain demographic information. As we discussed, this information will be included in the Final CRP, and there is no need to hold up the draft CRP for it.

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Ms. Maritza Montesinos-Gross

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If you should have any questions, please do not hesitate to call me at (703) 642-6747.

Yours truly,

Noel G. Simmons
Senior Project Manager

NGS/npg
Enclosures
5295.1-ROOSEVELTROAD-SUMMARYSITE8

CC: Dan Boucher, Code 09A2124 (1 copy)
James Spatarella
Nile Luedtke, Martin Marietta Energy Systems (1 copy)
Sindulfo Castillo, NAVSTA Roosevelt Roads (2 copies)