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5090.3a NO. 750 P003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1066

April 05, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

COPY

S. J. Pena
Commander, CEC, U.S. Navy
Public Works Officer
U.S. Naval Station Roosevelt Roads
TSC 1008 Box 3001
Code NO
FPO AA 34051-3001

Re: Tow Way Fuel Farm (SWMU #7) - Free Product Recovery System
U.S. Naval Station Roosevelt Roads
RCRA/HSWA Permit No. PR2170027203

Dear Commander Pena:

The United States Environmental Protection Agency (EPA) Region II has completed its review of the Monthly Free Product Recovery reports for January 1996 and the February 1996 transmitted respectively by Mr. S. Castillo's (Director, Environmental Engineering Division, Public Works Department, Naval Station Roosevelt Roads) letters of February 14, 1996 (received February 26, 1996) and March 12, 1996. EPA has serious concerns with effectiveness of the free product program as currently being implemented, and its ability to prevent/inhibit migration of the free product plume.

EPA does not understand the justification for utilizing only the seven recently (September 1995) installed recovery wells (PW-1, 2, 3, 4, 5, 6, and MW-1), clumped together in close proximity to one another, and presently containing thin to no free product layers. The thickness of the free product layer measured in the seven current recovery wells (based on February 28, 1996 measurements with pumps off) ranges from zero in recovery wells PW-1, 3, and 6 to a maximum of only 1.45 feet in well PW-5.

Yet, at the same time, numerous wells on the elongated (indicating spreading/migration) southeast flank of the plume, with free product layers ranging from 9.80 feet in well UGW-12 to 1.08 feet in UGW-21 (also 8.23 feet in UGW-13, 6.25 feet in UGW-17, and 3.23 feet in UGW-19) have no recovery operations near them. In addition, at the northwest flank of the plume, far removed from the seven active recovery wells, well UGW-3 contains 4.80 feet of free product and UGW-25 contains 1.68 feet. All the above thicknesses were measured on February 28, 1996 with pumps off.

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It should be noted that in the September 1995 Monthly report, (which was not received by EPA until January 23, 1996, though transmitted by Mr. S. Castillo's letter dated December 28, 1995, which also transmitted the July and August 1995 Monthly reports), the Navy's consultant, Terra Vac, stated that "...free product in UGW-25 has slowly increased over the past 9 months... [and] The installation of a recovery system should be evaluated at this time as a method to halt the advancing free product plume in this [UGW-25] area." EPA requests an explanation of why this recommendation has not been implemented to date.

Further, it should be noted that the locations of the seven present recovery wells do not conform with the recovery well locations recommended in the (EQB approved) September 1994 Corrective Action Plan (CAP). The CAP proposed a wider distribution for the 8 recovery wells recommended (see figure 5-1), with 3 recovery wells recommended for the southeastern flank of the free product plume, where currently there are none. Prior to September 1995, the distribution of seven wells then being utilized as free product recovery wells was similar to that recommended in the CAP. However, without advising or consulting EPA, this distribution pattern was abandoned, and replaced in September 1995 by the present seven recovery wells, clumped together in close proximity to one another (EPA did not even learn of this until after January 23, 1996, when we received the September 1995 monthly report).

As discussed in my February 23, 1996 letter to Captain K.W. Martello (EPA acknowledges receipt, via fax, of your March 20, 1996 response letter) Condition E.4 of Module III of the November 1994 RCRA/HSWA Operating Permit required submission and approval of an Interim Corrective Measures (ICMs) Work Plan for free phase hydrocarbon removal at Tow Way Fuel Farm (SWMU #7). However, pursuant to Condition E.4 of the permit, EPA, by my letter of July 19, 1995 to you, accepted, after the fact, the September 1994 CAP (which was already being implemented by the Navy) as the approved work plan, subject to restrictions/conditions given in my letter. Thereafter, subsequent major unilateral revisions in the free product recovery system at Tow Way Fuel Farm (SWMU #7), without EPA approval, are violations in fulfilling the approved work plan, and, therefore, the terms of the 1994 RCRA/HSWA Permit.

In addition, as discussed during the March 22, 1996 telephone call between Mr. Jim Malot of Terra Vac (the Navy's consultant for free product recovery at Tow Way Fuel Farm) and Mr. Tim Gordon of my staff, EPA strongly recommends that the Navy perform groundwater modeling to guide the design and implementation of free phase hydrocarbon recovery at the Tow Way Fuel Farm (SWMU #7). EPA had previously suggested the need for such modeling in the enclosure attached to my letter of July 27, 1995 to Mr. S. Castillo of your staff.

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EPA has just received the report on the extensive multi-phase well testing carried out at the Tow Way Fuel Farm (SWMU #7) during September and October 1995. The Navy has submitted this report (after several extensions were requested due to budgetary and contract interruptions) in response to EPA's July 27, 1995 comments on the Tow Way Fuel Farm free product recovery system as operated from January through May 1995, prior to the extensive changes implemented by the Navy, which are the subject of this letter. EPA received the complete multi-phase well test data report on April 1, 1996 (along with an advanced copy of the text faxed by Mr. Pedro Ruiz of your staff on March 26, 1996), but will not complete its review of this report until approximately May 10, 1996.

Though our comments in this letter may be impacted by the results of the multi-phase well testing data just submitted, they are nevertheless sufficiently independent of the new data, that EPA requests submission, within 30 days from the date of this letter, a written response to all our above comments (including the need for groundwater modeling). The Navy's response should incorporate, as appropriate, information/conclusions from the just submitted report on the extensive multi-phase well testing, and give specific recommendations to improve the effectiveness of the free product recovery program, especially as regards its ability to prevent/inhibit further migration of the free product plume.

Please contact Mr. Tim Gordon of my staff, at (212) 637-4167 if there are any questions.

Sincerely yours,

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

cc: Mr. Sindulfo Castillo, NAVSTA Roosevelt Roads
Mr. Israel Torres, PREQB
Mr. Art Wells, LANTDIV Code 1823
Mr. Adam Balogh, TRC Environmental