

03.01-03/20/96-00272



DEPARTMENT OF THE NAVY
U. S. NAVAL STATION, ROOSEVELT ROADS
PSC 1008, BOX 3001
FPO AA 34051

5090
Ser N02C-B13/0848
20 Mar 96

U.S. Environmental Protection Agency
Attn: Mr. Andrew Bellina
290 Broadway, 22nd Floor
New York, NY 10007-1866

Gentlemen:

This letter provides comments to the Resource Conservation and Recovery Act (RCRA) Field Investigation (RFI) Quarterly Progress Report, discussed in your letter of February 23, 1996. We have keyed our comments to have our paragraphs coincide with those in your letter.

1. As mentioned in the quarterly report, the data collected for solid waste management units (SWMUs) #6, 12, 14, and area of concern (AOC) B was for internal Navy use to prioritize funding, and not intended as a replacement for the data required pursuant to the approved work plan. Quality assurance/quality control data was not provided since it was not required for the intended Navy purpose. We want to reiterate that it has always been our intention to comply with the approved work plan, as scheduled. The data was submitted as a requirement of Condition B.8 of the Module III of the RCRA/Hazardous and Solid Waste Amendments permit which states that we must submit reports of all work performed at the sites. Field investigation on these SWMUs will begin in March 1996, in accordance with the workplans. Samples results, including QA/QC data, will be provided following completion of the field work.
2. Unfortunately, the quarterly report did not specify the dates that the free product recovery system was shut down. The system was not in operation at the time the quarterly report was written, November 1996, but was in operation during the months of July, August and September 1995. The system was shut down from October 1995 to December 1995 due to funding limitations at the beginning of the fiscal year. This information was faxed to your office, to the attention of Mr. Tim Gordon, on February 6, 1996. The October 1995 monthly report will not be submitted since the system did not operate this month. Funding has been provided for this fiscal year, and the system has been operating since January 1996.
3. We concur with your comment that Region III "Risk-Based Concentration" levels will not be exclusively used to determine

5090
Ser N02C-B13/0848
20 Mar 96

whether or not corrective measures are required. However, we would like to ask you to share with us how you plan to determine the required clean-up levels.

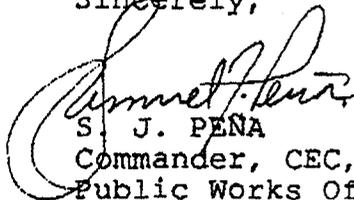
4.a) We acknowledge that Interim Corrective Measures for free-phase removal are required to be implemented pursuant to Condition E.4 of Module III of the permit and Condition IX of Appendix C. The Navy is committed to cleanup this site within the Department of Defense budgetary process and to fulfill the requirements of the permit. We will notify you of any cessation of free-phase hydrocarbon recovery in our monthly and quarterly reports.

b) We will comply with submission of the monthly reports 30 days following the end of the month. However, the monthly reports for October, November, and December 1995 will not be submitted since no activities were performed at the site as explained in paragraph 2.

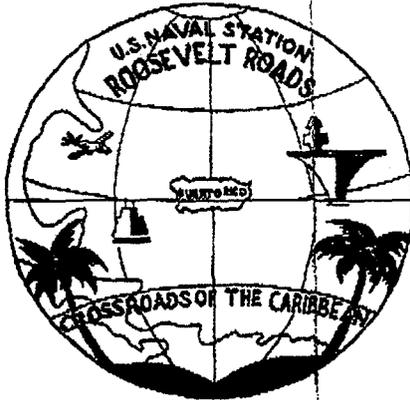
We appreciate your comments and look forward to continued cooperation in cleaning up these sites.

Should you have any questions, please contact Mrs. Madeline Rivera of my staff, at (787)865-4429.

Sincerely,



S. J. PENA
Commander, CEC, U.S. Navy
Public Works Officer
By direction of the
Commanding Officer



FASTMAIL TRANSMISSION COVER SHEET
ENVIRONMENTAL ENGINEERING DIVISION
PUBLIC WORKS DEPARTMENT
BOX 3021, BUILDING 31
U.S. NAVAL STATION, ROOSEVELT ROADS
FPO AA 34051-3021

FAX NUMBER (787) 865-4967

TOTAL NUMBER OF PAGES INCLUDING COVER SHEET: 3

DATE: 20 Mar 96

SUBJ: TOW WAY FUEL FARM (SWMU # 7)

FROM:	PEDRO J. RUIZ
AGENCY:	USNS ROOS RDS/PWD/EED
NAME/CODE:	N02C-B14
TELEPHONE:	(787) 865-4429

TO:	TIM GORDON
AGENCY:	EPA, REGION II
NAME/CODE:	
FAX #:	(212)637-4437

MESSAGE: Tim, enclosed is an advance copy of our response to your letter of February 23, 1996. If you have any questions, please let Madeline or me know.

COPY TO:
Art Wells (LANTDIV)
