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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

FEB 09 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Captain Stephen C. Wood  
Commanding Officer  
U.S. Naval Station Roosevelt Roads  
TSC 1008 Box 3001  
Code NO  
FPO AA 34051-3001

Re: Semi-volatile Organic Compounds (SVOC) Data  
U.S. Naval Station Roosevelt Roads  
RCRA/HSWA Permit No. PR2170027203

Dear Captain Wood:

As discussed during our January 13, 1995 meeting with Mr. James Szykman and Art Wells of Atlantic Division, Naval Facilities Engineering Command (LANTDIV), and Mr. Sindulfo Castillo of NAVSTA Roosevelt Roads Public Works Office, the United States Environmental Protection Agency (EPA) Region II has completed its review of the Additional Information Analytical Results, transmitted November 21, 1994 by your consultant, Baker Environmental, Inc. Comments prepared by EPA's contractor, A.T. Kearney/TRC Environmental (TRC), are enclosed.

EPA supports the conclusions, as discussed in the enclosure, that for the SVOC data, the usage of the Instrument Detection Limits (IDLs) as the basis for risk assessment, in place of the sample quantitation limits (SQLs), is not acceptable. Even though the SVOC samples were recorded as non-detections, the SQLs for this data were above the  $10^{-6}$  level, the established basis for further investigation, apparently due to excessive laboratory dilutions. However, the non-detections at the elevated SQLs do indicate that levels of gross SVOC contamination were not encountered.

While EPA does not accept the usage of IDL levels as the concentration basis for risk assessment, the fact that gross SVOC contamination was not encountered, allows for flexibility in both the timing, and possibly quantity, of SVOC data points required to be re-sampled. Therefore, EPA requests that for those SWMUs/AOCs affected (SWMU #1 - Army Cremator Disposal Site; SWMU #2 - Langley Drive Dispsal Site; SWMU #13 - Old Pest Control Shop/Building 258; AOC B - Public Works Dept./Building 25; AOC D/IR Site 14 - Ensenada Honda Sediments) a program of obtaining replacement SVOC data for the rejected data must be included as part of the RFI Work Plans, required to be submitted March 28, 1995 pursuant to the Final RCRA Permit.

Please contact Mr. Tim Gordon, of my staff, at (212) 637-4167 if there are any questions. Please note our new address, and Mr. Gordon's new telephone number.

Sincerely yours,

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

Enclosure

cc: Commander L.V. Marchette, NAVSTA Roosevelt Roads w/encl.  
Mr. P.A. Rakowski, P.E., LANTDIV w/encl. ✓  
Mr. Carl A. Soderberg, CFO w/encl.  
Mr. Israel Torres, EQB w/encl.  
Mr. Art Wells, LANTDIV w/encl.