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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

Certified Mail
Return Receipt Requested

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

Re: RCRA Facility Investigation (RFI) - Comments on Proposed RFI
Data Validation Methodologies
EPA I.D. PR2170027203

Dear Captain Wood:

The United States Environmental Protection Agency (EPA) Region II has completed its review of Appendix D, the proposed RFI data validation methodologies, of the Final RFI Work Plan, transmitted by your consultant, Baker Environmental, Inc. EPA has the following comments:

1. Methods 6010, 7000 Series, and 9010.
The format for these data validation methodologies are not acceptable. Please revise the format to be consistent with Region II's inorganic data validation SOP, which is being transmitted to Mr. Art Wells of Atlantic Division (LANTDIV) Code 1823, Naval Facilities Engineering Command, by copy of this letter.

2. Method 8080.
The proposed data validation methodology is not acceptable. The facility may use method 8080A (an improved version of method 8080), and the Region II method 8080A data validation SOP. The Region II method 8080A data validation SOP is being transmitted to Mr. Art Wells of LANTDIV by copy of this letter. Alternatively, the proposed method 8080 data validation methodology may be revised to be consistent with the Region II method 8080A data validation SOP.

3. Method 8140

The format for this data validation SOP is not acceptable. Please revise the format of this data validation methodology to be consistent with our Region II method 8150A data validation SOP, which is being transmitted to Mr. Art Wells of LANTDIV by copy of this letter.

4. Method 8150

The proposed data validation methodology is not acceptable. The facility may use method 8150A (an improved version of method 8150), and the Region II method 8150A data validation SOP. The Region II method 8150A data validation SOP is being transmitted to Mr. Art Wells of LANTDIV by copy of this letter. Alternatively, the proposed method 8150 data validation methodology may be revised to be consistent with the Region II method 8150A data validation SOP.

5. Method 8240

The format for this data validation SOP is not acceptable. Please revise the format of this data validation methodology to be consistent with our Region II method 8270B data validation SOP, which is being transmitted to Mr. Art Wells of LANTDIV by copy of this letter.

6. Method 8270

The proposed data validation methodology is not acceptable. The facility may use method 8270B (an improved version of method 8270), and the Region II method 8270B data validation SOP. The Region II method 8270B data validation SOP is being transmitted to Mr. Art Wells of LANTDIV by copy of this letter. Alternatively, the proposed method 8270 data validation methodology may be revised to be consistent with the Region II method 8270B data validation SOP.

7. Method 8330

The proposed data validation methodology is not acceptable. The facility may use the Region II method 8330 data validation SOP. The Region II method 8330 data validation SOP is being transmitted to Mr. Art Wells of LANTDIV by copy of this letter. Alternatively, the proposed method 8330 data validation methodology may be revised to be consistent with the Region II method 8330 data validation SOP.

Please submit appropriately revised Appendix D, the proposed RFI data validation methodologies, within 35 days of your receipt of this letter. If you have any technical questions on the above comments, please contact Mr. Leon Lazarus of EPA's Environmental Services Division, at (908) 321-6778. For any other questions, please contact Mr. Tim Gordon, of my staff, at (212) 637-4167.

Sincerely yours,

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

Enclosures (for Mr. Art Wells, LANTDIV, Code 1823)

cc: Commander S.J. Penna, NAVSTA Roosevelt Roads, w/o encl.
Carl Soderberg, CFO, w/o encl.
Israel Torres, EQB, w/o encl.
Art Wells, LANTDIV, **with enclosures**

FAX, 4 Sheets
Environmental Quality Division
Atlantic Division, Naval Facilities Engineering Command

From:	Art Wells	FAX	804-322-4805
	LANTDIV	VOICE	804-322-4587
To:	Tom Fuller	FAX	412-269-2002
	Baker	VOICE	412-269-2065
	Madeline Rivera	FAX	809-865-3021
	Roosevelt Roads	VOICE	809-865-4429
Date:	17 October 95		

Tom/Madeline,

Attached are EPA's comments (letter only) on our proposed data validation methodologies for the Roosevelt Roads RFI. Various data validation SOP's referenced in letter will be forwarded by mail as soon as possible. This is the final loose end we need to resolve with EPA for them to fully accept the RFI Project Plans. Thanks, Art