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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II  
290 BROADWAY  
NEW YORK, NEW YORK 10007-1866

JUL 13 1995

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Sindulfo Castillo  
Director, Environmental  
Engineering Division  
Public Works Department  
U.S. Naval Station Roosevelt Roads  
TSC 1008 Box 3001  
Code NO  
FPO AA 34051-3001

Re: SWMU #30 (Site 1983) - Site Characterization Report  
U.S. Naval Station Roosevelt Roads  
E.P.A. ID. No. PR2170027203

Dear Mr. Castillo:

The United States Environmental Protection Agency (EPA) Region II has reviewed the SWMU #30 (Site 1983) - Site Characterization Report, transmitted by your letter of May 17, 1995. EPA will consider the results of these investigations towards fulfillment of the investigation requirements for SWMU #30 (the former incinerator) of the 1994 RCRA/HSWA permit, subject to the following issues being satisfactorily resolved.

The investigations implemented as part of this report have established the presence of a significant area of petroleum contaminated subsurface soil. EPA does not fully accept the report's conclusion that "due to incomplete exposure pathways, the potential for human contact with the compounds of concern is extremely low." First of all, as is discussed below, since this investigation focused only on the underground storage tank, surface soils at this SWMU have not been characterized, and other potential sources at the SWMU have not been investigated. Therefore, until SWMU #30 is fully characterized, **any risk assessment conclusions are invalid.** Secondly, the "qualitative risk assessment" for the contaminated subsurface soils considered human exposure through consumption of bio-receptors (fish) in Puerca Bay (presumably through leaching to the groundwater and its

discharge to Puerca Bay, though the pathway was not described) and excluded it by noting that 1) "no commercial fishing is allowed; and 2) the compounds of concern [unspecified] in the groundwater do not exist above EQB standards." However, recreational fishing was apparently not evaluated, nor the possible future impact of continued leaching on groundwater. In addition, ecological impacts were not considered.

Therefore, EPA does not concur with the report's recommendation of no further action for this SWMU, and the corrective action requirements for SWMU #30 (the former incinerator) of the 1994 RCRA/HSWA permit, are not completed.

In addition, the report does not contain a complete data validation review of the analytical results. EPA requires that a complete data validation review be submitted with all RFI sample results. RFI data validation should follow either EPA's "Contract Laboratory National Functional Guidelines for Data Review", or the Region II "CERCLA Quality Assurance Manual", a copy of which had been previously supplied to Mr. James Szykman of LANTDIV.

Since this investigation focused entirely on contamination from the 550 gallon underground tank, surface soils at the SWMU #30 area were not investigated. At one soil boring location, sample 1983-SB-1 (#91418-6), soils from 2-4 feet were analyzed; however, at all other soil borings, samples were obtained from 4 feet below surface, or deeper. The subsurface soil results to date, suggest (based on the area and configuration of the subsurface soil contamination) that sources other than the underground tank (including releases at the surface and/or releases from underground piping) may also have contributed to the soil contamination at SWMU #30.

To complete the Permit required corrective action investigation, a surface soil investigation for this SWMU must be included in the RFI work plans currently being finalized. EPA suggests that a soil vapor survey on a grid basis, followed by selected soil samples at the highest soil vapor locations, would be the most efficient way to investigate possible surface releases across the SWMU #30 area. EPA requests that the location of any proposed soil vapor grid, and all subsurface piping (both currently or previously) associated with this SWMU be displayed on the SWMU map submitted with the RFI work plans.

EPA is not able to determine the location or depth of where the "1983 Soil Cuttings" (sample #91491) were collected. The location or locations and depths where the cuttings were collected must be clearly stated in the report.

Also, while groundwater characterization is fairly complete based on the 5 wells installed, since no wells were installed along the northwest flank of this SWMU (adjacent to the "steep vegetation covered hill"), there is a possibility, contingent on the results of surface soil investigation, that wells may be required along this flank.

In addition, only one copy of the report was submitted. In the future please supply two (2) copies of all documents submitted to my office.

Within 50 days of your receipt of this letter, please submit written comments to fully address the above deficiencies, along with a complete work plan to fully characterize the surface soils and other potential sources at the SWMU #30 area.

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. P.A. Rakowski, P.E., LANTDIV  
Mr. Carl A. Soderberg, 2EPA-CFO  
Mr. Israel Torres, PREQB  
Mr. Art Wells, LANTDIV