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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NEW YORK, NY 10007-1866

MAR 08 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul A. Rakowski, P.E., DEE
Head, Environmental Program Branch
Environmental Division,
Atlantic Division (LANTDIV), Code 182
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Re: Naval Station Roosevelt Roads - EPA ID # PR2170027203

- 1) Tow Way Fuel Farm Corrective Measures Study (CMS) Task I Report dated November 30, 1998;
- 2) Navy's December 16, 1998 Response to EPA's comments on the June 30, 1998 CMS Investigation Report for Tow Way Fuel Farm.
- 3) Navy's letter of February 19, 1999 requesting extension for response to EPA's comments on the OU 3/5 RFI Draft Final Report.

Dear Mr. Rakowski:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the Navy's November 30, 1998 Task I Report for the Tow Way CMS, and the December 16, 1998 response to EPA's comments on the CMS Investigation Report. Both documents were submitted on your behalf by Baker Environmental, Inc.. EPA has the following comments:

Tow Way Fuel Farm Corrective Measures Study (CMS) - Task I Report

EPA's contractor, TechLaw, Inc., has reviewed the Task I report, which covers Description of Current Conditions [Situation], Establishment of Corrective Action Objectives, and Screening of Corrective Measure Technologies, and had several brief comments, which are given in the enclosed January 18, 1999 Evaluation. While EPA generally agrees with TechLaw's conclusion that the Task I report meets the requirements given in Appendix B (Scope of Work for a CMS) of Module III of the November 1994 RCRA Permit (the Permit), EPA is not yet prepared to approve the Task I report and the recommended clean-up levels given in Section 3.2 of the report.

In order to approve the Task I report, EPA requires a much more complete discussion of the

development of the recommended risk-based clean-up levels for groundwater (i.e., dissolved constituents) and for soils (both surface and subsurface). This must include a complete screening of all possible exposure pathways (including vapor inhalation), and the basis for limiting the risk evaluated exposure pathways to only accidental ingestion and dermal contact for both soil and groundwater. Also, exposures pathways for the plume of phase-separated hydrocarbons (PSH) floating on top of the groundwater must be evaluated.

In addition, there is no discussion of clean-up goals for the PSH plume. Unless the Navy intends that the dissolved constituent clean-up goals for groundwater are to apply to the PSH plume, specific clean-up goals must also be defined for any non-aqueous phase liquids (NAPLs), such as the PSH layer. Such NAPL clean-up goals may be expressed in some manner other than concentration values (e.g., clean-up goals for PSH may be stated in terms of a measured PSH thickness [such as none], to be confirmed by a monitoring program over a period of time). The clean-up goals for the PSH must also include a discussion of its protectiveness in regards to ecological impacts.

In addition, as part of the discussion of the development of the recommended risk-based clean-up levels, EPA requires a thorough discussion and justification of why the recommended list of clean-up constituents of concern (COCs) should be limited to the four constituents listed in Section 3.2 (benzene, toluene, ethylbenzene, and total xylenes). EPA requests that any hazardous constituent detected at Tow Way Fuel Farm in the surface and/or subsurface soils at concentrations exceeding their respective Region 3 residential risk-based concentration (RBC) level, or in the groundwater at concentrations exceeding either their MCL (pursuant to 40 CFR § 141), or Region 3 tap water RBC, must be screened as a potential COC. The CMI Task I Report must include a discussion of why, or why not, they were determined to be COCs for the purposes of defining clean-up.

Furthermore, as discussed in the enclosed TechLaw evaluation, the Task I report contains no discussion of the trichloroethene (TCE) recently detected at an estimated ("J" qualified) concentration of 2000 ug/l in the groundwater of well 7MW07 (reported in the June 1998 CMS Investigation report). That concentration exceeds the MCL for TCE of 5 ug/l by a factor of 400. MCLs are generally recognized as appropriate Action Levels (screening levels) for further investigation, even if the clean-up standard is not ultimately set at that concentration. Even though a discussion of the possible TCE plume was not included in the Task I report, the Navy's December 16, 1998 response (which is discussed below) to EPA's comments on the CMS Investigation report, included a map showing all recent TCE detections at Tow Way Fuel Farm. Although that map indicates that the TCE plume appears localized to the 7MW07 area, it is not clear where points of negative control (where groundwater was sampled for TCE, but the results were non-detect) are located; therefore, it is not possible to ascertain if the TCE is truly localized in the 7MW07 area. The December 16, 1998 letter indicates that the Navy will subsequently issue (at an unspecified time) a letter to EPA regarding the need for follow-up activities for the TCE release.

In addition to such a letter, EPA requests that the TCE map (Figure 1 of the December 16, 1998 submittal) be revised to also show all recent (i.e., 1997 and later) TCE non-detect points. Also,

several other discrepancies or omissions, which are discussed in the enclosed TechLaw evaluation, must be addressed prior to EPA's final approval of the Task I report.

Within 45 days of your receipt of this letter, please submit a written response and/or an Addendum to the CMS Task I Report addressing all of the above comments and those given in the enclosed TechLaw evaluation of January 18, 1999.

December 16, 1998 Response to EPA's comments on the June 1998 CMS Investigation Report

In addition to our above comments regarding the TCE detection in well 7MW07, EPA has the following comments on the Navy's December 16, 1998 response letter.

For the responses to EPA's comments #2, 3, 4, and 5, and those given in the TechLaw evaluation included with EPA's October 2, 1998 letter, the Navy indicates they accept EPA's/TechLaw's comments; yet instead of supplying the appropriately revised text or figure, the letter contains numerous statements to the effect that the revised text or figure, etc., will be provided either with the "final submission" or "next submittal". EPA requests that within 45 days of your receipt of this letter, the Navy submit an addendum to the June 1998 CMS Investigation report, which includes all revised text or figures, etc., as indicated in Baker's December 16, 1998 letter. Such an addendum may be combined with the Addendum for the Task I report discussed above.

Navy's letter of February 19, 1999 requesting extension for response to EPA's comments on the OU 3/5 Draft Final RFI Report

As requested in Mr. Christopher Penny's letter of February 19, 1999, EPA approves the extension until March 22, 1999 for submission of your response to EPA's November 24, 1998 comments on the OU 3 & 5 Draft Final RFI Report.

Please telephone Mr. Tim Gordon of my staff at (212) 637- 4167 if you have any questions regarding any of the above.

Sincerely yours,



Nicoletta DiForte
Chief, Caribbean Section
RCRA Programs Branch

Enclosure

cc: Mr. Israel Torres, PREQB, with encl.
Ms. Madeline Rivera, NAVSTA Roosevelt Roads, with encl.
Mr. Christopher Penny, LANTDIV, with encl.
Ms. Luz Muriel-Diaz, PREQB, with encl.

EVALUATION OF
DRAFT
CORRECTIVE MEASURES STUDY TASK 1 REPORT FOR
TOW WAY FUEL FARM
AND
DECEMBER 16, 1998 RESPONSE TO EPA COMMENTS REGARDING CORRECTIVE
MEASURES STUDY INVESTIGATION, TOW WAY FUEL FARM, DATED JUNE 1998
NAVAL STATION ROOSEVELT ROADS
CEIBA, PUERTO RICO

Submitted to:

Ms. Elizabeth Van Rabenswaay
Regional Project Officer
U. S. Environmental Protection Agency
Region 2
290 Broadway, 22nd Floor
New York, New York 10007

Submitted by:

TechLaw, Inc.
122 East 42nd Street
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New York, New York 10168

January 18, 1999

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DRAFT
CORRECTIVE MEASURES STUDY TASK 1 REPORT FOR
TOW WAY FUEL FARM
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DECEMBER 16, 1998 RESPONSE TO EPA COMMENTS REGARDING CORRECTIVE
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NAVAL STATION ROOSEVELT ROADS
CEIBA, PUERTO RICO

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DRAFT
CORRECTIVE MEASURES STUDY TASK 1 REPORT FOR
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AND
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NAVAL STATION ROOSEVELT ROADS
CEIBA, PUERTO RICO

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA) has requested support for technical review of documents associated with the RCRA Facility Investigation (RFI) of the U.S. Naval Station Roosevelt Roads (NSRR) located in Ceiba, Puerto Rico. TechLaw has assigned this project to TRC, a TechLaw Team member under the REPA Contract under Work Assignment No. R02020.

The NSRR is located on the east coast of Puerto Rico in the municipality of Ceiba, approximately 33 miles southeast of San Juan. The primary mission of NSRR is to provide full support for the Atlantic Fleet weapons training and development activities. NSRR is currently operating under a Draft RCRA Corrective Action Permit that includes varying degrees of work at 28 Solid Waste Management Units (SWMUs) and three Areas of Concern (AOCs).

EPA requested the TechLaw Team to review the Draft Corrective Measures Study Task 1 Report for Tow Way Fuel Farm. The method and objective of this evaluation are presented in Section 2.0. General comments are presented in Section 3.0. Specific comments are detailed in Section 4.0. Recommendations are presented in Section 5.0.

2.0 METHODOLOGY

Pursuant to the EPA Work Assignment Manager's (WAM's) Technical Directive dated December 1, 1998, the TechLaw Team reviewed the Draft Corrective Measures Study Task 1 Report for Tow Way Fuel Farm to evaluate the completeness of site characterization, the acceptability of proposed clean-up goals, and the appropriateness of identified corrective measure alternatives. The review considered as guidance Appendix B ("Scope of Work For A Corrective Measure Study") of Module III of the Facility's 1994 RCRA Operating Permit. On December 18, 1998, EPA requested that the TechLaw Team also review the December 16, 1998 Response to EPA Comments regarding Corrective Measures Study Investigation, Tow Way Fuel Farm, dated June 1998.

The following documents were considered during these reviews:

- Draft Corrective Measures Study Investigation, Tow Way Fuel Farm, prepared by Baker Environmental, Inc., dated June 1998;
- Tow Way Fuel Farm Quarterly Summary Progress Report No. 7, NSRR, P.R. prepared by Baker Environmental, Inc., dated December 4, 1998;
- Interim Final RCRA Facility Investigation Guidance, OSWER Directive 9502.00-60, EPA 530/SW-89-031, May 1989;
- RCRA Final Permit Required Quarterly Progress Report, August 1, 1998 - October 31, 1998, prepared by Baker Environmental, Inc., dated December 4, 1998; and,
- Scope of Work For A Corrective Measure Study at U.S. Naval Station Roosevelt Roads, Appendix B, Module III of the 1994 RCRA Operating Permit.

3.0 General Comments

The Task I report adequately discusses the Scope of Work actions presented in Appendix B of Module III of the Facility's 1994 RCRA Operating Permit for the Tow Way Fuel Farm with the discrepancies noted below. The December 16, 1998 Response to Comments regarding the Corrective Measures Study Investigation adequately addresses EPA's concerns.

The Task I report does not discuss the detection of trichloroethene at 7MW07 reported in the Draft Corrective Measures Study Investigation (June 1998). This is not considered a significant omission since the December 16, 1998 Response to Comments states that follow-up activities are being conducted to evaluate additional investigative actions.

4.0 Specific Comments

Page 3-3, Paragraph 2

The text should include a brief synopsis of risk assessment findings. For example, the text should indicate that the risk assessment determined that migration of volatiles from ground water and subsurface soil into indoor air spaces was not a concern.

Appendix A

Discrepancies in the preliminary remediation goals must be clarified and the goals revised as appropriate. The soil to-skin adherence factor should be revised from 0.2 mg/cm² to 1 mg/cm² as specified in Dermal Exposure Assessment: Principles and Applications (EPA, 1992). The adult

water ingestion rate should be revised from 0.05/liters to 0.08 L/hour for consistency with the 2 liters per 24 hour assumption presented on page 3-2, section 3.2.2.

5.0 RECOMMENDATIONS

The following are recommended:

- Review baseline and pilot study analytical results which will be provided in the CMS Task II report to evaluate the CleanOX process; and,
- Review findings regarding the use of the building located adjacent to 7MW07 to evaluate adequacy of proposed investigative activities regarding source and extent of trichloroethene contamination.