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AUG 22 2000

U. S. Environmental Protection Agency
Region II
Attn: Ms. Nicoletta DiForte
Chief, RCRA Caribbean Section
290 Broadway - 22nd Floor
New York, New York 10007-1866

SUBJECT: U.S. NAVAL STATION ROOSEVELT ROADS, PUERTO RICO
RCRA CORRECTIVE ACTION PROGRAM
RCRA/HSWA PERMIT NO. PR2170027203
SWMU SAMPLING AND ANALYSIS PLAN FOR SWMUS 53 AND 54
REVISED FINAL II CMS FINAL REPORT FOR SWMUS13 AND 46/AOC C

Dear Ms. DiForte:

This letter confirms that the Navy has submitted to EPA Region II the SWMU Sampling and Analysis Work Plan for SWMUs 53 and 54 and the Revised Final II CMS Final Report for SWMUs 13 and 46/AOC C on August 4, 2000. These submittals were sent separately by Baker Environmental. It should be noted that the Navy submitted the Notification and SWMU Assessment Reports for SWMUs 53 and 54 concurrently in the RCRA Quarterly Progress Report (01 February 2000 - 30 April 2000) on 31 May 2000.

The schedule identified in the SWMU 53/54 Sampling and Analysis Work Plan has been developed in accordance with Module III Section C of the NSRR Final RCRA Part B Permit and the implementation of this schedule is dependent upon EPA reviewing these work plans within 45 days. Upon receipt of EPA comments on the Work Plan, the Navy will respond to the comments and finalize the Work Plan and/or schedule as required. Following EPA approval of the SWMU 53/54 Sampling and Analysis Final Work Plan, the Navy will then implement these work plans accordingly.

As previously mentioned, the Navy has also provided EPA Region II with the Revised Final II CMS Final Report for SWMUs 13 and 46/AOC C. This document has been revised to include the requested information from your comment letter dated March 15, 2000. Please note that on behalf of the Navy, Baker Environmental Inc. provided detailed responses to these comments in a letter to your office on May 30, 2000. The CMI Design for SWMUs 13 and 46/AOC C were submitted to the EPA on July 10, 2000 in accordance with your

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request in EPA's Comment Letter dated March 15, 2000. Your comment letter requested that the human health risk-based cleanup levels and remediation levels be addressed as part of the CMI Design. In order to avoid confusion in the tracking of modifications associated with the Final CMS Final Report, the Navy elects not to provide these modifications into the CMI Design, but rather revise the Final CMS Final Report for SWMUS 13 and 46/AOC C to include the human health risk related revisions. Upon your review, the Navy requests that EPA issue a final approval letter on the CMS Final Report.

Please do not hesitate to call me at (757) 322-4815 if you have any questions or desire further clarification of any of the points discussed in the enclosure.

Sincerely,

CHRISTOPHER T. PENNY, REM
Navy Technical Representative
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

EPA Region II (Mr. Tim Gordon)
US EPA Caribbean Office (Mr. Carl Soderberg)
Booz Allen & Hamilton (Ms. Constance Crossley)
NAVSTA Roosevelt Roads (Ms. Madeline Rivera)
PREQB (Mr. Jose J. Lajara)
Baker Environmental, Inc. (Mr. Mark E. Kimes, P.E.)
CH2M Hill Virginia Beach (Mr. John Tomik)

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