UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

OCT 10 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Christopher T. Penny
Navy Technical Representative
Installation Restoration Section (South)
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) Sampling and Analysis Plan for new SWMUs 53 and 54, dated August 4, 2000;

2) Response to EPA Comments on Corrective Measures Study (CMS) Task 1 Report for Tow Way Fuel Farm (SWMUs #7 & #8), dated June 29, 2000.

Dear Mr. Penny:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the above documents transmitted on behalf of the Navy by Baker Environmental Inc. EPA's comments on the above documents are given below.

Sampling and Analysis for SWMUs 53 and 54, dated August 4, 2000

EPA has reviewed the Sampling and Analysis Plan (the work plan) for recently identified [new] SWMUs 53 and 54, submitted on behalf of the Navy by Baker Environmental Inc on August 4, 2000, as well as your August 22nd letter regarding those recently identified SWMUs. SWMU #53 consists of the unoccupied (but not demolished) former Malaria Control Building, and SWMU #54 consists of the former NEX [Naval Exchange] vehicle maintenance/repair shop. Although both buildings existed and were utilized for these functions for many years, their identification as SWMUs was first made in the RCRA Quarterly Progress Report submitted to EPA on May 31, 2000.

Based on our review, the work plan, which EPA considers equivalent to the Phase 1 RFI or Release Assessment [for description refer to the EPA guidance document "RCRA Corrective Action Plan," dated May 31, 1994, EPA 520-R-94-004] for these two SWMUs, is now approved. Pursuant to Condition III.C.4(c) of the 1994 RCRA Operating Permit for Naval Station Roosevelt Roads, implementation should commence not later than 30 calender days from your receipt of this letter. However, since Section 7.0 of the work plan indicates that implementation will commence "Once funding [from the Navy] is made available..." [refer to the schedule given in Table 7-1], EPA's approves an extension for commencement of implementation of the work plan. However, approval of that extension is contingent on implementation of the field activities required under the work plan being completed not later than March 31, 2001 (i.e., the end of Q/2 FY'01). If such is not the case, the Navy must request in writing a further extension for implementation of the work plan. As proposed in Section 6.0, a draft report on the sampling results must be submitted not later than thirty days from the Navy's receipt of all validated analytical results.

Response to EPA Comments on Corrective Measures Study (CMS) Task 1 Report for Tow Way Fuel Farm (SWMUs #7 & #8), dated June 29, 2000 ["the Response"];

EPA has reviewed the Response, submitted on behalf of the Navy by Baker Environmental Inc's letter of June 29, 2000, to address EPA's comment letter of May 4, 2000 on the Navy's January 21, 2000 responses [submitted by Baker Environmental Inc. on behalf of the Navy] to EPA's June 30, 1999 [original] comments on the CMS Task 1 Report for Tow Way Fuel Farm.

EPA requested our contractor, Booz Allen & Hamilton (BAH) to review the June 29th Response. BAH's comments are given in the enclosed Technical Review [dated September 22, 2000]. Based upon their review, BAH concluded, and EPA concurs, that while the Navy adequately addressed the majority of concerns, but not all, given in EPA's letter of May 4, 2000, the Navy did not include complete exposure pathways when determining cleanup goals for Tow Way Fuel Farm. A re-calculation of the cleanup goals is necessary to ensure that the cleanup levels will be protective of cumulative exposures possible from each media. In addition, the Navy should demonstrate that cleanup goals, protective of future construction workers, have been developed for all chemicals of concern in both surface and subsurface soil. This is necessary, because the Navy did not composite surface and subsurface soils when assessing risk to the construction worker in the baseline risk assessment.

Also, several of the Navy's responses in the June 29th Response indicate that the facility intends to rely on a proposed deed restriction or other institutional control to preclude future residential use of the area as well as prohibit the use of groundwater as a potable source. EPA's comments are predicated on the assumption that such land use and groundwater use restrictions will be implemented. If, however, such land use and groundwater use restrictions are not

ultimately secured as part of the Final Remedy for Tow Way Fuel Farm, the CMS will have to be revised to evaluate potential future residential usage of that site, along with utilization of the groundwater as a potable water source, unless documentation of the groundwater's non-potability is included in the CMS Final Report, when submitted.

Although BAH's Technical Review concluded that many of the Navy's proposals in the Response, but not all, were either acceptable or partially acceptable, EPA cannot fully approve those responses, because many of the responses were positioned as "will be discussed/addressed in the CMS Final Report" and did not include the proposed revised text and/or necessary calculations, etc. [refer especially to your responses to "USEPA Consultant Comments (BAH)" #1, 4, 5, 7, 13, 15, and 16]. In addition, the Response regarding the comment on Section 3.4.2 (Human Health Risk Based Cleanup Goals) is not acceptable.

However, rather than revising and re-submitting the Response to include a comprehensive response and/or necessary calculations, and to address comments on the Response given in the enclosed Technical Review, EPA requests instead that the necessary text and calculations, etc., and other revisions to address comments given in the enclosed Technical Review, be reflected in the Draft Corrective Measure Study (CMS) Final Report for Tow Way Fuel Farm (SWMUs #7 & #8), when submitted. EPA's understanding is that the Draft CMS Report will be submitted to the Agency by January 31, 2001. If that is not correct, please advise in writing within thirty days of your receipt of this letter, when it will be submitted, and the causes for any delay beyond January 31, 2001.

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

Sincerely yours,

Timothy R. Gordon, for

Nicoletta DiForte, Chief
Caribbean Section
RCRA Programs Branch

Enclosure

cc: Mr. Jose J. Lajara, PREQB w/encl.
Ms. Madeline Rivera, NAVSTA Roosevelt Roads w/encl.
Mr. Mark Kimes, Baker Environmental w/encl.
Mr. John Tomik, CH2M Hill w/encl.
Ms. Connie Crossley, Booz Allen w/o encl.

TECHNICAL REVIEW OF

NAVAL STATION ROOSEVELT ROADS
JUNE 29, 2000, RESPONSE TO EPA COMMENTS DATED JANUARY 21, 2000, REGADING THE REVISED CORRECTIVE MEASURES STUDY TASK I REPORT FOR TOW WAY FUEL FARMS

CIEBA, PUERTO RICO

SEPTEMBER 22, 2000
REPA2-0203-024

GENERAL COMMENTS

1a. Response is partially acceptable. Naval Station Roosevelt Roads (NSRR) should also discuss (per the Response to Specific Comment 6) how institutional controls will be used to prevent future residential exposures to groundwater under a non-potable scenario (e.g., lawn watering, car washing).

1b. Response is partially acceptable. NSRR neglected to consider construction worker exposure to both surface and subsurface soil. A construction worker should be considered for exposure to both surface and subsurface soil (0 to 15 feet below ground surface), due to the possible mixing of the soils during heavy construction. Therefore, NSRR should re-screen for contaminants of concern (COC) based on composite concentrations of surface and subsurface soil. Alternatively, if NSRR can demonstrate that all the COCs have been identified for the construction worker in both surface and subsurface soil, that cleanup goals have been calculated for all of the identified COCs, and that these cleanup goals will be protective of a construction worker exposed to both surface and subsurface soil, then it is acceptable that NSRR not re-screen for COCs based on composite concentrations of surface and subsurface soil. NSRR should address this issue in the draft Corrective Measures Study (CMS) Final Report.

1c. Response is acceptable.

2. Response is acceptable. However, because the revised text was not supplied in the June 29, 2000, Response to Comments Letter, this issue will be further reviewed when submitted in the draft CMS Final Report.

SPECIFIC COMMENTS

Section 3.2, Identification of Media of Concern/Contaminants of Concern (COCs) as Determined by the Human Health Risk Assessment, page 3-4

1. Response is partially acceptable. NSRR has indicated that total lead was retained as a COC in the Draft RCRA Facility Investigation (RFI) Report for OU 2 (SWMU 7/8). However, total lead has not been included as a COC in groundwater in the Revised CMS Task I Report, nor has it been discussed. The maximum total lead concentration (3,500 ug/L) exceeds the EPA action level of (15 ug/L) by two orders of magnitude. NSRR must address total lead concentrations in groundwater in the draft CMS Final Report.

Section 3.3, Exposure Routes and Receptors, page 3-4

2. Response is partially acceptable. See General Comment 1b.

Section 3.4.2, Human Health Risk-Based Cleanup Goals, page 3-9

3. Response is not acceptable. According to USEPA Risk Assessment Guidance for Superfund, Part B, Development of Risk-Based Preliminary Remediation Goals (RAGS Part B) (USEPA, 1991), all relevant exposure pathways should be considered when developing preliminary remediation goals. While there may be pathways (e.g., inhalation) that did not produce unacceptable human health risks in the baseline risk assessment, the inhalation pathway is a complete exposure pathway and must be included in determining cleanup goals. This will ensure that the cleanup levels will be protective of cumulative exposures possible from each media. Thus, NSRR should revise the cleanup goals to include consideration of the inhalation pathway.

4. Response is acceptable.

5. Response is acceptable.

Section 3.4.3, Selection of Cleanup Levels, page 3-10

6. Response is acceptable.

Section 3.4.3 Selection of Cleanup Level, page 3-11

7. Response is acceptable.

8a. Response is acceptable.

8b. Response is partially acceptable. See response to General Comment 1a.

Table 3-1

9. Response is acceptable.

Tables 3-2 and 3-3

10. Response is acceptable.

11. Response is acceptable.

Table 3-5

12. Response is acceptable.

Table 3-6

13. Response is acceptable.

Table 3-7

14. Response is acceptable.

Table 3-8

15. Response is acceptable.

Table 3-9

16. Response is not acceptable. See response to Specific Comment 3.