



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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JUN - 3 2003

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Kevin Cloe  
Navy Technical Representative  
Installation Restoration Section (South)  
Environmental Program Branch  
Environmental Division,  
Atlantic Division (LANTDIV), Code EV23KC  
Naval Facilities Engineering Command  
1510 Gilbert Street  
Norfolk, VA 23511-2699

Re: Naval Station Roosevelt Roads - EPA I.D. Number PRD2170027203

1. March 7, 2003 revisions to Corrective Measures Study (CMS) Work Plan for SWMU 53 and 54
2. March 18, 2003 Draft Recharacterization Work Plan for SWMU 11
3. Final CMS Investigation Report and Additional Data Collection Work Plan for SWMU 9

Dear Mr. Cloe:

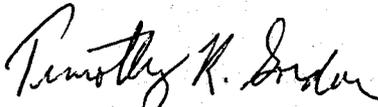
The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the above documents which were submitted on behalf of the Navy by Baker Environmental's letters of March 7, March 18, and April 25, 2003, respectively. As part of its review, EPA requested our contractor, Booz Allen Hamilton, to review documents 1 and 3 above. Booz Allen has found those two documents acceptable, as has EPA. Therefore, the Corrective Measures Study (CMS) Work Plan for SWMU 53 and 54 dated March 7, 2003 is approved. Also, the Final CMS Investigation Report for SWMU 9, dated July 2, 2001, as modified by the April 25, 2003 submittal from Baker Environmental is approved, along with the Additional Data Collection Work Plan for SWMU 9, dated April 25, 2003, which is also approved. You had previously been verbally advised of these determinations.

Since polychlorinated biphenyls (PCBs) are the primary constituent of concern [as addressed pursuant to the facility's 1994 RCRA Permit] at SWMU 11, the interior areas of the old power plant, EPA requested that our Pesticides and Toxic Substances Branch (PTSB) review the March 18, 2003 Draft Recharacterization Work Plan for SWMU 11. Due to certain inconsistencies and other issues discussed in the enclosed May 8, 2003 memo developed by PTSB, EPA cannot approve the Draft Recharacterization Work Plan as submitted. It should also be noted that asbestos, which is likely present at SWMU #11, is not addressed under the Draft Recharacterization Work Plan. Remedial measures for asbestos are not generally implemented pursuant to RCRA corrective action requirements, as given at 40 C.F.R. § 264.101.

As discussed during our May 6, 2003 meeting at EPA's New York offices, EPA also recommends that the SWMU 11 Draft Recharacterization Work Plan be expanded to also include a proposed Interim Measures (IM) Plan to establish [if not already established] and maintain engineering controls to prevent site access by workers and/or trespassers to the interior areas of the old power plant (SWMU 11). Within 45 days of your receipt of this letter, please submit a revised Draft Recharacterization Work Plan for SWMU 11 to comply with all applicable comments given in the enclosed May 8, 2003 memo, and also an IM Plan as described above. The two plans may be submitted as one document.

If you have any questions, please telephone me at (212) 637- 4167.

Sincerely,



Timothy R. Gordon  
Remedial Project Manager  
Caribbean Section  
RCRA Programs Branch

Enclosure

cc: Mr. Julio I. Rodriguez Colon, Attn. Mr. Efrain Camis Rosado, PREQB w/encl.  
Ms. Madeline Rivera, Public Works Dept. w/ encl.  
Ms. Kathy Rogovin, Booz Allen & Hamilton w/encl..  
Mr. Mark Kimes, Baker Environmental w/encl.

Date

TIM

DATE: **MAY 08 2003**

SUBJECT: Draft Recharacterization Work Plan for SWMU #11, Building 38, Old Power Plant  
USNS Roosevelt Roads

FROM: Kenneth S. Stoller, Chief *Daniel Kraft for*  
Pesticides and Toxic Substances Branch

TO: Adolph Everett, P.E., Chief  
RCRA Programs Branch

We have reviewed the Draft Recharacterization Work Plan for SWMU #11 at USNS Roosevelt Roads transmitted by your memo dated March 27, 2003.

Original investigation results are presented, as well as plans for recharacterization following both a fire in the building and the amendments to the PCB regulations. We have concerns with the data presented in the original characterization. Section 2.1 discusses the range of PCB concentrations detected in 126 wipe samples. However, the data is presented in micrograms per liter ( $\mu\text{g/L}$ ). The corresponding Table 2-1 summarizing all wipe sample results expresses the same results discussed in Section 2.1 in  $\mu\text{g/wipe}$ . Besides the conflicting units of measure for the same data, neither is appropriate for a standard wipe sample.

The  $\mu\text{g/L}$  unit of measure is appropriate for liquid samples. Wipe samples should be expressed in  $\mu\text{g}/100\text{ cm}^2$ . Of additional concern is Figure 2-1 which depicts a color coded illustration of the contamination codes with the points based on ranges expressed in parts per billion (ppb). The representation translates the results in Table 2-1 (listed in  $\mu\text{g/wipe}$ ) as being equal to the same value in ppb (i.e., 550  $\mu\text{g/wipe}$  at 11WS44 corresponding to 550 ppb shown in green for the range of 100 - 1000 ppb). As noted above, the appropriate unit of measure for a wipe sample is  $\mu\text{g}/100\text{ cm}^2$ . If the values in Table 2-1 expressed in  $\mu\text{g/wipe}$  are in fact  $\mu\text{g}/100\text{ cm}^2$ , this does not translate to the same numerical value in ppb. The unit  $\mu\text{g/L}$  does correlate to ppb, however, as stated above,  $\mu\text{g/L}$  is not an appropriate unit of measure for wipe samples.

40 C.F.R. § 761.1(b)(3) specifies that PCB provisions for concentrations of less than 50 parts per million (ppm) correspond to PCB concentrations of less than or equal to  $10\text{ }\mu\text{g}/100\text{ cm}^2$ . Provisions applying to PCB concentrations between 50 and 500 ppm correspond to between 10 and  $100\text{ }\mu\text{g}/100\text{ cm}^2$ . Provisions applying to concentrations over 500 ppm apply to contaminated surfaces at PCB concentrations over  $100\text{ }\mu\text{g}/100\text{ cm}^2$ . While recharacterization is pending, it is only planned for recollection of a portion of the original samples. Therefore, we would like clarification of the original values with appropriate units of measure, also bearing appropriate and consistent units of measure in mind for the recharacterization samples.

Approximately one third of the original number of wipe samples, as well as a limited number of concrete chip samples will be conducted. The original sample results have been relied upon to target specific areas for additional wipe sampling essentially to gauge the impact of the fire. Chip sampling primarily encompasses less than a quarter of the floor area.

Until the inconsistencies identified above for the original sampling are clarified we can not evaluate whether the bulk sampling proposed is sufficient to fully characterize contamination in the floor. EPA's March 2002 letter recommended that *in the new sampling plan some wipe samples should be obtained from floor areas where PCB contamination was less than 10  $\mu\text{g}/100\text{ cm}^2$  to assess if the extent of contamination has been substantially changed by the fire. For the same reason, some wipe samples should be taken in the most contaminated areas and on the walls (at the same height as previously sampled). These wipe samples are intended to evaluate if the impact of the fire on contamination was substantial.* The letter also recommended that *bulk samples should be taken in the most highly contaminated areas to determine PCB contamination within the concrete. The bulk sample results would be the primary information used to evaluate further actions.* In the absence of reliable wipe sample data to focus the bulk sampling, we would recommend 40 C.F.R. §761 Subpart N be utilized for characterization. Subpart N provides a method for collecting new data for characterizing a PCB remediation waste cleanup site or for assessing the sufficiency of existing site characterization data, as required by §761.61(a)(2).

If you have any questions of the above information you may contact Vivian Chin, of my staff, at (732) 906-6179.