



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

SEP 19 2002

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

Draft RFI Final Report for SWMUs 53 and 54

Dear Mr. Cloe:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the Draft RFI Final Report SWMUs 53 and 54, which was submitted on behalf of the Navy by Baker Environmental Inc's letter of July 17, 2002. SWMU 53 consists of the former Malaria Control Building (Building 64) which was utilized from 1942 until 1980, and apparently is still intact. SWMU 54 consists of a former automobile repair and maintenance facility (building 1914), which is no longer operating, but still intact, and the adjacent underground storage tank (UST) at building 510. The Draft Final RFI report incorporates the results of two rounds of investigations at SWMUs 53 and 54: the December 2000 investigations results originally reported in the April 2001 Sampling and Analysis Report, and a subsequent round of investigations conducted under the December 2001 RFI Work Plan.

SWMU 53

For SWMU 53, the Draft Final RFI Report indicates that arsenic, lead, and 4,4-DDT were detected in the surface soils at concentrations exceeding EPA Region 3's residential risk-based-concentrations (RBCs) and for lead, a concentration of 400 mg/kg, based on EPA's 1996 Soil Screening Guidance. The Draft Final RFI Report indicates that the surface soils have been adequately delineated for those three constituents. For the subsurface soils at SWMU 53, all concentrations detected were either below the relevant screening levels cited above, and/or for certain inorganic constituents, below native background concentrations.

However, the Draft Final RFI Report indicates that because chlordane and heptachlor epoxide were detected in a single outlying [i.e., not surrounded by other data points] sample location (53SB14-00) during the 2002 investigations at concentrations exceeding their residential RBCs, the delineation of contamination in the surface soils from those two constituents has not yet been fully completed.

The Draft Final RFI Report recommends that the delineation of chlordane and heptachlor epoxide be completed and that "...a corrective measure study (CMS) be completed to develop remedial alternatives for the pesticides and metals that are present in the surface soil at SWMU 53." EPA concurs. As discussed during our telephone conversation on September 10, 2002, the Navy proposes to develop a CMS work plan for SWMU 53 that includes both: a) completion of delineation of the chlordane and heptachlor epoxide in the surface soils and b) a proposal for expedited removal of any chlordane and heptachlor epoxide contaminated soils, as well as the arsenic, lead, and 4,4-DDT contaminated soils already defined. EPA approves the Draft Final RFI Report as competing the RFI for SWMU 53, contingent on the Navy's agreement to complete delineation of any chlordane and heptachlor epoxide containing soils as part of the CMS.

#### SWMU 54

For SWMU 54, the Draft Final RFI Report recommends that a CMS be developed for trichloroethene (TCE), benzene, and ethylbenzene plumes in the groundwater. EPA concurs. In addition, since chloroform was detected in all nine groundwater samples collected during the 2002 RFI investigations at concentrations exceeding the Region 3 Tap Water RBC of 0.15 ug/l, as part of the CMS, chloroform should be evaluated as a potential constituent of concern (COC) for groundwater. Also, since benzo(a) pyrene exceeded its MCL of 0.2 ug/L in two groundwater samples collected in as part of the 2000 investigations, it should also be evaluated as a potential COC for groundwater.

In addition, the Draft RFI Final Report recommended that no further action be required for surface and subsurface soils, without adequately explaining the basis for that recommendation. Even though the constituent 1,2-Dibromo-3-chloropropane was measured in one subsurface soils at a concentration slightly elevated to the Region 3 residential risk-based-concentration of 456 ug/kg, the Draft Final RFI Report recommended no further action for subsurface soils without adequately explaining the basis for that recommendation, [presumably because the constituent was only detected at an elevated concentration in one of eight subsurface samples (5 locations), and the depth interval of the sample with the elevated concentration (9 - 11 feet below ground surface) may have been impacted by contaminant plumes in the groundwater, which are to be addressed as part of the CMS]. The Draft CMS work plan should clarify why the volatile constituent 1,2-Dibromo-3-chloropropane was not identified as a potential COC for subsurface soils.

EPA approves the Draft Final RFI Report as completing the RFI for SWMU #54, contingent on the CMS work plan, in addition to containing proposals for evaluating remedies for the TCE, benzene, and ethylbenzene plumes in the groundwater, include an evaluation of chloroform and benzo(a) pyrene as potential COCs for groundwater, and 1,2-Dibromo-3-chloropropane as a potential COC for subsurface soils.

Pursuant to Condition III.E.5.(a) of the 1994 RCRA Permit (the Permit) issued to Naval Station Roosevelt Roads, this shall constitute the notification that a CMS is required for SWMUs 53 and 54. Pursuant to Condition III.E.5.(d) of the Permit, please submit a draft CMS work plan within 60 days of your receipt of this letter.

In addition, please be advised that Ms. Nicoletta DiForte and Mr. Raymond Basso are no longer assigned to the RCRA Programs Branch. Therefore, in the future please address all RCRA permitting and corrective action related correspondence to:

Acting Chief,  
RCRA Programs Branch  
U.S. Environmental Protection Agency  
290 Broadway, 22<sup>nd</sup> Floor  
New York, NY 10007-1866,

with a copy also sent to myself.

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

Sincerely yours,



Timothy R. Gordon, Acting Chief  
Caribbean Section  
RCRA Programs Branch

cc: Mr. Carmelo Vazquez, P.R. Environmental Quality Board  
Ms. Madeline Rivera, Public Works Department, Naval Station Roosevelt Roads  
Ms. Kathy Rogovin, Booz Allen & Hamilton  
Mr. Mark Kimes, Baker Environmental