



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

7/5/96-01204

JUL - 5 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

S. J. Peña
Commander, CEC, U.S. Navy
Public Works Officer
U.S. Naval Station Roosevelt Roads
TSC 1008 Box 3001
Code NO
FPO AA 34051-3001

Re: RFI Quarterly Progress Report - February 1, 1996 - April 30,
1996, U.S. Naval Station Roosevelt Roads
RCRA/HSWA Permit No. PR2170027203

Dear Commander Peña:

The United States Environmental Protection Agency (EPA) Region II has reviewed the RFI Quarterly Progress Report - February 1, 1996 - April 30, 1996 transmitted on the Navy's behalf by Baker Environmental, Inc.'s (your consultant's) letter of May 30, 1996. EPA has two main comments on the report.

First, the discussion of field investigations implemented during this period (at SWMUs 7, 8, and 9) is far too cursory, and, except for Attachment 3, the geophysical investigation report, provides no substantive details/description of the investigation work actually carried out. In addition, there is no discussion of the field requested major changes from the program contained in the approved RFI work plan (again except for the geophysical investigation report), and the basis for requesting and implementing such changes. Please submit, with the next quarterly RFI progress report (due August 30, 1996), a more detailed description of the field investigations implemented at SWMUs 7, 8, and 9 during the period February 1 through April 30, including a discussion of all field requested major changes from the program contained in the approved work plan, along with the basis for requesting and implementing such changes. In the future, similar information should be included for any RFI investigation activities implemented during the period covered.

Secondly, although the report contains voluminous analytical results for several SWMUs, EPA cannot accept the data as final, even though it is apparently validated (based on data qualifier's), due to the absence of the following:

- 1) A complete data validation report;
- 2) Copies of all field and laboratory raw data records; and
- 3) A written discussion regarding the results and conclusions, and recommendations (further action, no-further action, etc.).

In addition, the following items must also be submitted before the data can be accepted:

- 4) Maps showing the location of all samples;
- 5) Well logs for all groundwater sampling points, and lithologic descriptions for all soil samples;
- 6) Identification of the exact depth interval sampled (for both groundwater and soil samples).

In order to have this data considered towards partial fulfillment of the corrective action requirements of Module III of the 1994 RCRA Final Permit, please submit the above items by August 30, 1996, the due date for the next quarterly RFI progress report. In the future, similar information should be included for any RFI analytical results submitted.

The field and laboratory raw data records should be submitted directly to Mr. Leon Lazarus of Region II's Environmental Services Division (ESD), at the following address:

U.S. Environmental Protection Agency
Attn: Mr. Leon Lazarus
Monitoring Management Branch
2890 Woodbridge Ave.
Edison, NJ 08837

A copy of the transmittal should be sent to my office. The other items (including the data validation report) should be sent directly to my office. Please contact Mr. Lazarus at (908) 321-6778, if you have any questions regarding the type of field and laboratory raw data records to be submitted. Please contact Mr. Tim Gordon of my staff, at (212) 637-4167 regarding any other questions.

Sincerely yours,

Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch

cc: Mr. Sindulfo Castillo, NAVSTA Roosevelt Roads
Mr. Israel Torres, PREQB
Mr. Art Wells, LANTDIV Code 1823