

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAR 26 2004

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 RCRA Facility Investigation (RFI) Report for SWMU 11 (interior areas of closed
Power Plant - Building 38)

Dear Mr. Cloe:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the above document which were submitted on behalf of the Navy by Baker Environmental's letter of February 5, 2004. As part of its review, EPA requested our contractor, Booz Allen Hamilton, to review the report. Based on Booz Allen's and our own review, EPA has determined that the SWMU 11 draft RFI report is not yet fully acceptable. Specific comments are given in the enclosed Technical Review dated March 18, 2004 (revised by EPA March 25, 2004).

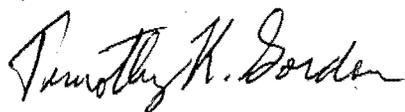
In addition, as discussed in previous letters, any future RFI and/or CMS Final Reports where final action recommendations are made, including the no further action recommendation made in the SWMU 11 draft RFI report, must thoroughly consider the impact of the planned closure of Naval Station Roosevelt Roads (NSRR) on March 31, 2004. The SWMU 11 RFI must indicate how the Navy will ensure that the proposed no further action recommendation and existing interim access control measures will remain appropriate when the installation is closed and the site is transferred to private or other ownership. The discussion must also thoroughly describe the land use assumptions that were made in proposing the recommendation. The discussion provided in the RFI Report should be adequate to establish that the proposed no further action recommendation and existing interim access control measures will remain appropriate after the property transfers.

As part of the technical evaluation and justification for any recommended final remedy, including no further action, this and future RFI and/or CMS Final Reports should clearly identify any specific land-use control (LUC) mechanisms that will be utilized (e.g., fencing, signage, covenant restrictions, zoning/permitting requirements) as part of the final remedy.

Within 30 days of your receipt of this letter, please submit a revised RFI report, or an addendum to the report, addressing the above comments and those in the enclosed Technical Review. However, since you have indicated in our conference call on March 22, 2004 that some of the future land-use and land-use control mechanisms for the SWMUs and AOCs at Roosevelt Roads cannot be fully specified at the present time, EPA will withhold its request for revision of those portions of the RFI final report where revisions are necessary to address our comments regarding future land use and land-use controls. However, EPA will then not be able to complete its evaluation of the acceptability of the SWMU 11 RFI final report and its recommendation for no further action until the Navy revises the report to fully specify the expected future land-use and land-use controls (LUCs) to be placed on SWMU 11, and discusses how those LUCs and the existing access control measures will remain appropriate when the installation is closed and the site is transferred to private or other ownership.

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

Sincerely yours,



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

Enclosure

cc: Mr. Julio I. Rodriguez Colon, P.R. Environmental Quality Board, with encl.
Ms. Yarissa Martinez, P.R. Environmental Quality Board, with encl.
Mr. Sindulfo Castillo, Public Works Dept., Naval Station Roosevelt Roads, with encl.
Ms. Kathy Rogovin, Booz Allen & Hamilton, with encl.
Mr. Mark Kimes, Baker Environmental, with encl.

TECHNICAL REVIEW

FEBRUARY 5, 2004

DRAFT RCRA FACILITY INVESTIGATION REPORT FOR SWMU 11

NAVAL STATION ROOSEVELT ROADS CEIBA, PUERTO RICO

REPA3-1203-024

March 18, 2004

(Revised by EPA March 25, 2004)

I. GENERAL COMMENTS

1. Review of the February 5, 2004, Draft RCRA Facility Investigation Report for SWMU 11 Report (SWMU 11 Report) indicates that the Navy followed the approved July 21, 2003, Recharacterization Work Plan for SWMU 11 (Work Plan). However the SWMU 11 Report does not adequately address the polychlorinated biphenyl (PCB) contamination and asbestos-containing material. Specifically, the SWMU 11 Report proposes no further action for this SWMU. It is recognized that the July 21, 2003, Interim Measures Work Plan indicates that the building is locked and that no person may enter the building without contacting Madeline Riveria. Although this is an acceptable interim measure, it is not sufficient for final remedy. Because the facility is being closed and the property will ultimately be transferred, an interim measure is no longer sufficient and a final remedy must be achieved. As part of the evaluation for final remedy, the Navy may need to conduct a risk evaluation, implement remedial and/or removal activities, and implement deed restrictions. However, the current recommendation of no further action is not acceptable. The SWMU 11 Report should be revised to address issues regarding future use and final remedy.
2. The SWMU 11 Report indicates that elevated levels of PCBs are present in Building 38. However, no comparison of the wipe sampling or chip sampling results to relevant regulatory levels (e.g., TSCA) are included in the document. The SWMU 11 Report should compare and discuss PCB results relative to applicable regulatory levels so that an assessment of the degree of impact can be made. This assessment is necessary for risk evaluation and evaluation/selection of the final remedy.

II. SPECIFIC COMMENTS

Section 1.2, Site History

1. The SWMU 11 Report indicates (pg. 1-2) that soil remediation occurred outside the building. Even though the areas outside the building is not considered part of SWMU 11, the RFI should discuss the relationship of SWMU 11 and SWMU 45 (outside areas of

the closed power plant), and briefly summarize the results of the corrective measures implemented at SWMU 45. Also, the levels of residual PCB contamination that remains in place in the soils around the outside areas of the building and any potential human health risks should be briefly discussed in the SWMU 11 Report.

Section 2.4, Assessment of the Thermal Insulation inside the Building

2. The SWMU 11 Report indicates that asbestos is present in the building and that the asbestos is damaged in many locations. Based on the October 31, 1994, Memorandum from the Office of the Under Secretary of Defense, the asbestos policy for facilities undergoing Base Realignment and Closure (BRAC) is, "asbestos-containing material shall be remedied prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property." Because the asbestos is damaged, it may pose a threat to human health. The SWMU 11 Report should be revised to include a discussion of whether the type and condition of asbestos are in compliance with applicable laws, regulations, and standards; whether the asbestos poses a threat to human health; and if so, how the asbestos-containing material will be remediated prior to transfer.

Section 3.2.2, Concrete Chip Sampling

3. The SWMU 11 Report indicates that six concrete chip wall samples and 13 concrete chip floor samples were collected and evaluated for the presence of PCBs. The results of these samples indicate that PCB contamination is present in the concrete. In addition, some concrete chip samples, such as sample 11CC13(F), reported highly elevated concentrations (430 mg/kg) of Aroclor-1260. However, no comparison to applicable standards, such as Toxic Substances Control Act (TSCA) requirements, have been included in the document (see General Comment No. 2), and there is no discussion of the significance of the PCB levels present in the chip samples or the potential risks to human health, if any.

In addition, the SWMU 11 Report merely presents the results of the chip sampling but does not evaluate whether the chip samples adequately characterize contamination within and below the concrete. Since the first one-half inch of concrete is contaminated, the need for additional evaluation and possibly sampling of the deeper concrete and soil beneath the concrete may be warranted.

The Navy should revise the SWMU 11 Report to include a discussion of the PCB concentrations in the concrete chip samples, including a comparison to applicable regulatory levels and a discussion of the potential risks to human health, if any. In addition, the Navy should also discuss the integrity of the concrete, the actual thickness of the concrete, and indicate if cracks or joints in the concrete were observed. Finally, the

Navy should evaluate whether additional sampling of deeper concrete is warranted based on the current results of the chip samples.

Section 3.3, Comparison of Wipe Sample Results from Both Investigations

4. The SWMU 11 Report presents the results of the wipe samples. In addition, the SWMU 11 Report compares the previous PCB wipe sample results with the newly collected PCB wipe sample results. However, no comparison of the contaminant levels to applicable regulatory levels, or a discussion of the potential risks to human health is included in the SWMU 11 Report. Since the recommendation for SWMU 11 is no further action, a discussion of the contaminant levels relative to applicable regulatory levels and the potential risks to human health is warranted. Revise the SWMU 11 Report to include a comparison of the wipe sample data to applicable regulatory levels and an evaluation of the potential risks to human health.

Section 6.0, Conclusions and Recommendations

5. The Work Plan indicates (pg. 3-5) that EPA and the Navy, "will consider all sludge and other materials located in the tunnels/pits to contain PCBs at concentrations greater than 50 parts per million (ppm). Therefore, no additional sludge samples will be obtained during the investigation." The SWMU 11 Report recommends no further action, which means that sludges and materials with PCB concentrations greater than 50 ppm are allowed to remain in place. Furthermore, it is unclear how much sludge and other materials located in the tunnels/pits and the PCB concentration levels these materials contain. Because the facility is being closed and the property will ultimately be transferred, the PCB materials must either be remediated or a risk evaluation of the material must be conducted. Furthermore, because the volume and concentrations are unknown, additional sampling will probably be required for a risk evaluation. The Navy should revise the SWMU 11 Report to address these PCB containing sludge and other materials located in the tunnels/pits.
6. The Navy proposes no further action for SWMU 11. The problem with the proposed no further action is that the recommendation does not address issues associated with reuse of the building, property transfer, and future land use. The July 21, 2003, Interim Measures Work Plan indicates that the building is locked and that no person may enter the building without contacting Madeline Rivera. Although this may have been an acceptable interim measure while the facility remained an active, controlled-access military base, it is not sufficient for the final remedy, and may not even be applicable after March 31, 2004, as EPA understands that Ms. Rivera will no longer be employed at the facility once control is transferred to Naval Activity Puerto Rico (NAPR). Because the facility is being closed and final remedy must be reached, the proposal of no further action recommendation is not supported. The Navy must revise the SWMU 11 Report to address issues regarding future use and final remedy for this SWMU.