



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

MAR - 8 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

1. Draft Re-characterization Sampling Work Plan for SWMU #11 (Interior Areas of Building 38 - the Old Power Plan)
2. Draft RFI Work Plan for SWMU #3 (Currently Operating Solid-waste Landfill)

Dear Mr. Cloe:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the Re-characterization Sampling Work Plan for SWMU #11 (Interior Areas of Building 38 - the Old Power Plan), which was submitted on the Navy's behalf by Baker Environmental Inc. Investigation of SWMU 11 is required under the 1994 RCRA operating permit issued to Roosevelt Roads. As you may recall, a sampling program to delineate PCB contamination inside SWMU #11 was implemented in 1996, and involved 126 wipe samples. That sampling program did not include evaluation for other potential contaminants inside the building, including asbestos, and other hazardous wastes or constituents. Subsequently, in 1998 a significant fire occurred inside the building, and patterns of PCB contamination delineated by the 1996 sampling may have been altered as a result of the fire. Therefore, on March 31, 1998 the Navy submitted the Re-characterization Sampling Work Plan for SWMU #11.

Since the primary identified constituent of concern at SWMU 11 is PCBs, which are regulated under TSCA, we requested Region 2's Pesticides and Toxic Substances Branch (PTSB) to review the work plan. Comments prepared by PTSB [Mr. David Greenlaw] are enclosed.

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In regards to PCB contamination, the most significant comment is that since, at this time the future disposition of the building has not been determined, the specific sampling and clean-up requirements cannot be fully defined. Ultimately, the intended future disposition of the building must be defined in determining the clean-up requirements. Among comments on the re-characterization work plan itself, the enclosed memo recommends that:

- 1) floor areas where the 1996 sampling found PCB contamination to be less than 10 ug/100cm² should be re-evaluated with wipe samples to determine if the extent of contamination has been substantially changed as a result of the 1998 fire;
- 2) likewise the most highly contaminated areas in the 1996 sampling, as well as wall locations sampled in 1996, should be re-evaluated with wipe samples to determine if the extent of contamination has been substantially changed by the fire;
- 3) however, wipe samples are no longer acceptable for determining clean-up levels for porous surfaces, including concrete. Bulk samples must be utilized to evaluate clean-up requirements. EPA recommends that the Re-characterization Sampling work plan be revised to also include a bulk sampling program as described in the enclosed memo.

In addition, as noted above, SWMU 11 has never been investigated for other potential contaminants, including asbestos, and/or hazardous wastes and hazardous constituents. EPA recommends that the revised work plan also include a screening program for other potential contaminants, including asbestos, and/or hazardous wastes and hazardous constituents inside SWMU 11. Otherwise, prior to any final determination as to the requirements for the final disposition of this SWMU, a subsequent investigation may be required following evaluation of PCB contamination at this SWMU.

The Re-characterization Sampling work plan must be revised to address the above comments and other comments given in the enclosure. Please submit a revised work plan within 60 days of your receipt of this letter.

SWMU #3

EPA approves the revisions to the RFI work plan for SWMU #3 submitted on behalf of the Navy by Baker Environmental's letter of January 24, 2002. Implementation of the remaining RFI work is to be per the schedule given in Figure 6-1 of the December 17, 2001 updated RFI work plan.

If you have any questions, please have them contact Mr. Tim Gordon of my staff, at (212) 637-4167.

Sincerely yours,



Nicoletta DiForte, Chief
Caribbean Section
RCRA Programs Branch

Enclosure

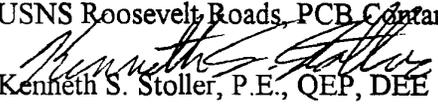
- cc: Mr. Carmelo Vasquez, P.R. Environmental Quality Board; w. encl.
Ms. Madeline Rivera, Public Works Department, Naval Station Roosevelt Roads, w. encl.
Christopher Penny, Environmental Division, Atlantic Division (LANTDIV), Naval Facilities Engineering Command, w. encl.
Ms. Kathy Rogovin, Booz Allen & Hamilton, w. encl.
Mr. Mark Kimes, Baker Environmental, w. encl.
Mr. John Tomik, CH2MHill, w. encl.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

ENCLOSURE

DATE: FEB 04 2002

SUBJECT: USNS Roosevelt Roads, PCB Contamination, SMU #11, Building 38, Old Power Plant.

FROM: 
Kenneth S. Stoller, P.E., QEP, DEE
Chief
Pesticides and Toxic Substances Branch

TO: Raymond Basso, Chief
RCRA Programs Branch

We have reviewed the Sampling Results and Recharacterization Workplan dated March 31, 1998 for SMU #11. At this time the future disposition of the building has not been determined.

The proposed sampling workplan relies on wipe samples for determining concentrations of polychlorinated biphenyls (PCBs) on surfaces and takes into consideration that levels of contamination may have been affected by a fire in the building subsequent to the last sampling event.

Substantial changes were made to the PCB regulations, 40 C.F.R. Part 761, in the PCB Disposal Rule issued on June 29, 1998 and amended on June 24, 1999.

If the building were intended to be sold it would have to be remediated in accordance with 40 C.F.R. § 761.61 for use prior to the sale (40 C.F.R. § 761.20(c)).

Cleanup or disposal of the building materials is to be based on the actual PCB concentration as found, on a dry weight basis. Cleanup levels in porous materials, like concrete, are to be determined based on bulk samples. Wipe samples can be used to focus on areas with the highest contamination but are no longer used for determining cleanup levels for porous surfaces unless cleanup is commenced within 72 hours of the release.

In the new sampling plan some wipe samples should be obtained from floor areas where PCB contamination was less than 10 $\mu\text{gm}/100 \text{ cm}^2$ 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. Bulk samples should be taken in the most highly contaminated areas to determine PCB contamination within the concrete. The bulk sample results would be primary information used to evaluate further actions.

PCB bulk samples should be taken from the top $\frac{1}{2}$ inch of concrete. If deeper penetration of PCBs is anticipated, additional samples of material $\frac{1}{2}$ inch to $1\frac{1}{2}$ or deeper can be taken at the

same time as the ½ inch depth samples. New samples of the walls should be near (e.g., within 2 feet of) the floor as the likely area of the highest contamination is near the floor.

Any low level where oils may have contacted concrete for long periods of time would be likely to be among the most highly contaminated. The tunnels/pits were found in the reported sampling to contain PCBs sludge and other materials at 50 ppm or greater in 14 of 17 samples. There does not seem to be any reason to resample this material, we suggest that it all be considered to contain PCBs at 50 ppm or greater.

Remediation under 40 C.F.R. § 761.61 generally requires PCB contamination to be reduced to 1 ppm or less unless engineering controls and deed restrictions are established and maintained. Cleanup levels up to 100 ppm are addressed in pre-determined cleanups found at 40 C.F.R. § 761.61(a). Other risk-based cleanups can be authorized under 40 C.F.R. § 761.61(c) and coordinated with RCRA corrective action risk based cleanups under 40 C.F.R. § 761.77 (Coordinated Approvals).

With the appropriate bulk sample information the remediation options of cleaning surfaces, removing concrete, or implementing another method consistent with 40 C.F.R. § 761.61 may be evaluated. If material from the building or the building itself were to be disposed, the areas with PCB concentrations of 50 ppm or greater in the concrete could be defined.

The PCB regulations do not have requirements on the disposal of material that contains less than 50 ppm on an as found basis except for the particular uses banned under 40 C.F.R. § 761.20(c). If a remediation is performed under 40 C.F.R. § 761.61(a) the disposal methods within that section are allowed. Material containing PCBs at concentrations of 50 ppm or greater may be disposed in a TSCA landfill or incinerator as authorized under 40 C.F.R. § 761.61(b). Other criteria and methods of disposal of PCBs at concentrations of 50 ppm or greater may be included in a risk based approval authorized under 40 C.F.R. § 761.61(c).

Another option in the regulations for use is found at 40 C.F.R. § 761.30(p), which allows contaminated surfaces that are double washed/double rinsed and encapsulated to be used. This is not a remediation and is not included in 40 C.F.R. § 761.20(c) as an option that would permit the distribution in commerce (e.g. sale) of the contaminated area.

If you have any questions on the above information you may contact Mr. David Greenlaw of my staff at 732-906-6817. We recognize that PCB remediation can be complicated and are available to discuss this with anyone your branch selects.