



DEPARTMENT OF THE NAVY

ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST
NORFOLK, VA 23511-2699

TELEPHONE NO

(757) 322-4815

IN REPLY REFER TO:

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U. S. Environmental Protection Agency
Region II
Attn: Ms. Nicoletta DiForte
Chief, RCRA Caribbean Section
290 Broadway - 22nd Floor
New York, New York 10007-1866

SUBJECT: U.S. NAVAL STATION ROOSEVELT ROADS, PUERTO RICO
RCRA CORRECTIVE ACTION PROGRAM
RCRA/HSWA PERMIT NO. PR2170027203
EPA COMMENT LETTER DATED OCTOBER 10, 2000 ON
REVISED DRAFT CMS TASK I REPORT FOR TWFF (SWMU 7/8)

Dear Ms. DiForte:

This letter is in response to your comment letter dated October 10, 2000 regarding the risk based clean up goals associated with the CMS Task I report for the above referenced Site. The Navy requests that in lieu of proceeding to the CMS Final Report (Tasks II, III, and IV) as indicated in your letter, that we develop a complete stand-alone CMS Task I that provides sufficient data to allow for independent assessment of the adequacy of the proposed clean-up levels. This is in keeping with your comments provided in your June 30, 1999 comment letter. In addition Appendix B, Module III of the RCRA Part B Permit states that the establishment of corrective action objectives is to be performed in the Task I phase of the Corrective Measures Study. Failure to follow this process may result in corrective measure alternative(s) that do not meet the corrective measure objectives.

Therefore, the Navy prefers to submit a revised Section 3.0 from the Task I CMS on January 31, 2001. This submission will include the entire Section 3.0 of the Task I CMS for your review since this is the only portion of the Task I CMS, for which comments were directed. Following the approval of the revised Section 3.0, the entire Task I CMS will be released as the Final Task I CMS Report. Once the Task I CMS Report is completed and approved then the development of the CMS Final Report can continue. Based on the above, an additional 90 days upon approval of the Task I CMS Report will be required to complete the CMS Final Report.

Quality Performance ... Quality Results

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If you have any questions please contact me at (757) 322-4815 or
Mr. Kevin R. Cloe, P.E. at (757) 322-4736.

Sincerely,



CHRISTOPHER T. PENNY, REM
Navy Technical Representative
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

EPA Region II (Mr. Tim Gordon)
US EPA Caribbean Office (Mr. Carl Soderberg)
Booz Allen & Hamilton (Ms. Constance Crossley)
NAVSTA Roosevelt Roads (Ms. Madeline Rivera)
PREQB (Mr. Jose J. Lajara)
Baker Environmental, Inc. (Mr. Mark E. Kimes, P.E.)
CH2M Hill Virginia Beach (Mr. John Tomik)