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DEPARTMENT OF THE NAVY  
ATLANTIC DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
NORFOLK, VIRGINIA 23511-6287

TELEPHONE NO

(804) 445-8855

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1822:JFS:srw

26 FEB 1992

U.S. Environmental Protection Agency  
Region IV  
Attn: Mr. James S. Kutzman, P.E., Associate Director  
RCRA & Federal Facilities Branch  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Dear Mr. Kutzman:

This is in response to the Environmental Protection Agency (EPA) Region IV letter of October 25, 1991, concerning environmental monitoring data reporting requirements. The Prototype Electronic Reporting System (PERS) software and documentation enclosed with the letter have been reviewed and evaluated. Most of the data required for input into the Interchange File Format (IFF) is collected by our contractors during field events and is provided via submission of RCRA Facility Investigation (RFI) reports, Installation Restoration Remedial Investigation (RI) reports, and other related documentation.

We do not have the resources to implement a pilot data management system for your electronic data reports in addition to the reporting format currently in effect under the Navy's Installation Restoration Program. The proposed EPA system adds no value to the RCRA/CERCLA remediation process for Navy/Marine Corps facilities. Processing of the data into an electronic management system should be performed by EPA or EPA contract personnel as your funding and resources permit.

We will continue to report environmental investigation data using the formats established under RCRA and CERCLA regulations. We will also provide electronic-based data and other pertinent information within our contract requirements for completing RFI and RI reports. However, we cannot divert the resources required for implementation of the IFF at this time.

If you have any questions or comments, please call Ms. Nina Johnson at (804) 445-6643.

A handwritten signature in cursive script, appearing to read "P. A. Rakowski", is located above the typed name.

P. A. RAKOWSKI, P.E.  
Head  
Environmental Programs Branch  
Environmental Quality Division  
By direction of the Commander

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