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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

MAR 20 1986

Mr. J. R. Bailey, P.E.
Environmental Quality Branch
Utilities, Energy and Environmental Division
Department of the Navy, Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511-6287

Dear Mr. Bailey:

We are submitting the enclosed comments on the following Phase I NACIP reports:

- Initial Assessment Study of Naval Activities
San Juan Area, Puerto Rico
- Initial Assessment Study of Naval Security
Group Activity Sabana Seca and Naval Communications Station,
Puerto Rico
- Initial Assessment Study of Naval Station
Roosevelt Roads, Puerto Rico

We request being kept informed of future phases of these studies. This would include receiving copies of scopes of work for our review and also updated status reports on the progress of the Phase II Confirmation Studies.

Please send all correspondence to my attention at the above address. Should you have any questions, please contact Linda Comerci of my staff at (212) 264-5394.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Robert W. Hargrove".

Robert W. Hargrove
Federal Facilities Coordinator
Environmental Impacts Branch

Enclosures

EPA - Region II COMMENTS ON THE INITIAL ASSESSMENT STUDY OF
SABANA SECA AND NAVAL COMMUNICATIONS STATION, PUERTO RICO

Assessment of the NAVCOMMSTA has proceeded logically and NO ACTION recommendations have been adequately justified. The nine sites, as described, pose no threat to the environment or human health for reasons of not having used generated, or spilled hazardous substance, having disposed of no more than irrelevant amounts of such substances on site, or have appropriately and safely contained said substances onsite or disposed of them off site. There is no basis for commenting further upon the study's classification of the NAVCOMMSTA sites.

Assessment of the sites of NSGA Sabana Seca, while having proceeded similarly to these of the NAVCOMMSTA installations, impress us as having assigned NON-CONFIRMATION status, in some instances, somewhat prematurely. Groundwater flow patterns at Sabana Seca would appear to be somewhat less than well-defined and the relatively self-contained nature of the installation and attendant volume and variety of waste that it generates present possibilities that the retired landfills - sites 1, 3, and 4 contain significant volumes of unknown materials such as the drummed waste removed from site 5 when it was remediated. The oldest landfill (site 1), for example might be considered particularly suspect for reason of its greater volume and the relaxed regulatory climate extent during its operation.

Ostensibly, all three landfills are favorably situated relative to the facility, presupposing of course that groundwater flow is exclusively as described (i.e., seaward). The only recommendation in this instance would be the installation and monitoring of a leachate collection system between the sites and the facility.

Site 5, as noted, has been remediated. The systematic and directed soil sampling recommended for site 6 seems to have been adequately conceived. We assume that additional samples would be taken as indicated by the nature of the soils profile (i.e., presence of organic mats, clays) Finally, the posting of the adjacent picnic area might as well have been considered as an interim remedial measure.

The confirmation study recommended for site 7 is considered appropriate both as to the types of samples and analysis. Again, given the perceived uncertainties as the groundwater flow patterns, an "upgradient" monitoring well should also be installed.

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EPA-REGION II COMMENTS ON THE INITIAL ASSESSMENT STUDY OF
NAVAL STATION-ROOSEVELT ROADS, PUERTO RICO

The objective of the IAS was defined as identification and assessment of sites posing a potential threat to human health or the environment due to contamination from past hazardous waste operations.

Based on an intensive record review twenty sites were identified at the NAVSTA for study. Of the twenty sites, sixteen were recommended for confirmation studies including:

- Site 9, PCB Disposal Area
- Site 7, Station
- Site 18, Pest Control Building Area
- Site 12, Two Way
- Site 15, Substation
- Site 11, Building
- Site 10, Building
- Site 3, IRFNA/M Vieques
- Site 13, Tanks
- Site 14, Ensenada Honda Shoreline and Mangroves
- Site 16, Old Power Plant, Building 38
- Site 2, Mangrove Disposal Site, Vieques
- Site 5, Army Cremator Disposal Area
- Site 6, Langley Drive Disposal Site
- Site 1, Quebrada Disposal Site, Vieques
- Site 8, Drone Washdown

An evaluation of historic data, as well as surface and aerial surveys was used in characterizing the sites examined under the IAS. The data presented in the report is adequate to determine the need for Confirmation Studies at the sites examined.

The specific criteria listed in the report for recommendation of a Confirmation Study are; sufficient evidence exists to indicate the presence of contamination, and the contamination poses a potential threat to human health or the environment. These criteria were used effectively in screening the sites examined in the IAS. The four sites not recommended for further studies have no record of past hazardous waste disposal or onsite use of hazardous materials.

The specific criteria listed in the report for recommendation of a Confirmation Study are; sufficient evidence exists to indicate the presence of contamination, and the contamination poses a potential threat to human health or the environment. These criteria were used effectively in screening the sites examined in the IAS. The four sites not recommended for further studies have no record of past hazardous waste disposal or onsite use of hazardous materials.

Deficiencies of the IAS are limited to the sampling programs recommended under the confirmation studies. An example is the Quebrada Disposal site. The site is a landfill 500 feet long, 20 feet deep and 4 feet wide located in a quebrada or intermittant drainage channel. The report recommends compositing three, six inch deep borings at three locations. The report states that materials, including solvents and 55 gallon drums, were buried at the site between the early 1960's and late 1970's. Surface sampling is not sufficient to verify contamination at the site. A more thorough investigation is needed. Another example is the PCB Disposal, Dry Dock Area Site. The report recommends magnetometer or visual inspection to locate intact or remnants of twentyfive 5 gallon containers of PCB contaminated dielectric fluid disposed of in Puerca Bay. It also recommends collection of ten sediment cores, 60 inches long. Although we concur with the magnetometer visual inspection portion of the study we do not believe that the core sampling program is reasonable. Distribution of the PCB contaminated dielectric fluid would likely be limited to the surface sediments (top foot) if it does occur. Because the site is located off a wet slip we assume that the area would be dredged if sedimentation interfered with use of the wet slip. Because there is no mention of dredging activities since 1968, the time of disposal, we assume there is limited sedimentation on the site and the containers and any contaminated sediments would be near the surface. We would suggest that the sampling program be modified to sample a wider horizontal distribution of the top foot of sediments.

It is our opinion that the recommendations for no action or Confirmation Study presented in the report are adequate based on the available data and the technical evaluation of the data.

In general the recommended programs appear to be designed exclusively to confirm the presence of the contamination. However, the sampling as outlined does little to assess potential threats to the public health and the environment.

It appears, that more intensive sampling is justified based on historical evidence of hazardous waste activities and the fact that several of the sites are located in habitats of rare and endangered species such as the Caribbean manatee.

We recommend that detailed alternative sampling plans be prepared for each of the sixteen sites, which would address the vectors and potential for human and environmental endangerment.