



DEPARTMENT OF THE NAVY

ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORFOLK, VIRGINIA 23511-6287

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IN REPLY REFER TO:

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12 SEP 1986

U.S. Environmental Protection Agency
Attn: Mr. Robert W. Hargrove
Federal Facilities Coordinator
Region II
26 Federal Plaza
New York, NY 10278

Gentlemen:

We appreciate your comments on the ~~NACEL~~ Phase I reports and would like to provide you with some additional information and to respond to the issues you raised. Since your letter of March 20, 1986, our personnel have made two fact-finding trips to Puerto Rico; your HRS contractor, NUS Corporation, has visited each of the sites identified in the Phase I reports; and our Confirmation Study (CS) contractor has completed one round of sampling at those sites recommended for further study. Although we were not allowed to review the NUS report, we would like to convey additional facts gained during site visits by our staff and our CS contractor (his report is still in draft form and not available for review).

Comments on Initial Assessment Study (IAS) at Naval Activities, San Juan Area

During visits to the former San Juan Naval Station in March and July 1986, we inspected the sandblast grit disposal area identified as Site 1 in the IAS. The piles of sandblast grit present during the IAS team's visit have been removed and Building 19 has been demolished. The tenants on the property, the Puerto Rico Drydock Authority, are paving the area to use for storage. As a precaution, we sampled some of the grit on the ground and are enclosing the analysis results. The material did not exhibit the characteristics of EP toxicity, as defined in 40 CFR 261. We do not believe additional investigation is warranted and, at the conclusion of the paving operation, will consider the site remediated.

Since the advent of the Underground Storage Tank regulations, the Navy has established a separate program for inventorying, investigating, and remediating leaking underground tanks. Site 2, the fuel tanks and drain lines, will be deferred to this program for study and subsequent remediation. Your concerns regarding the procedure for draining the tanks have been forwarded to that program manager. You will be given the opportunity to review the detailed specifications for draining the tanks as they become available.

After carefully considering your comments on Site 3, the Salvage Yard Disposal Area, we cannot concur with your recommendations. From the information presented in the IAS, any hazardous materials present at the site would have come from an occasional diverted truckload of municipal waste. Of more concern would be the municipal landfill that received the bulk of this material. We believe the potential for PCB migration from filters that may have been in a truckload of garbage that may have been diverted to this disposal area to be remote. In March of this year, inspection of this site revealed a grassy area which appeared to be unused. A steep, rocky hill separates the landfill from the softball field to the west. By the time of our July site visit, the area had been converted to an impound yard by the Puerto Rican authorities. No exposed debris was visible in an inspection of the shoreline. Excessing this property to the Puerto Rican government has been tied up in the courts for several years; however, we will endeavor to have the IAS precautions for future use of this property included in the final property transfer records.

Regarding your concerns over the application of DDT and other pesticides, we believe the DDT spraying operations and the extensive use of pesticides, herbicides, and insecticides were not confined to the Naval Station, but occurred throughout the metropolitan San Juan area. While we do not intend to launch a separate investigation into potential pesticide problems on the former Naval Station, we would be willing to participate in any studies of the metropolitan San Juan area initiated by your office or the Environmental Quality Board.

Comments on the IAS of Sabana Seca and Naval Communications Station

We have noted your comments on Sites 1, 3, and 4, but we do not believe the available evidence warrants additional monitoring at those sites. The Naval Security Group Activity is classified as a small quantity generator; for example, our records show they generated less than 150 gallons of hazardous waste in 1985. Secondly, a visual inspection of the sites did not reveal any mounds characteristic of extensive landfilling; wrecked cars were the only visible exposed debris. You may want to consult NUS Corporation's HRS report for an independent evaluation. Finally, we have installed a network of monitoring wells to determine if contaminated groundwater could be moving from Site 7 to the activity's potable wells. These well locations, shown in Enclosure (2), should also detect any contaminants migrating from Site 3.

Although we are monitoring six wells, including the two potable wells, as part of the Confirmation Study, we have no plans to install additional wells around the municipal landfill (such as an upgradient well) since it is non-Navy property.

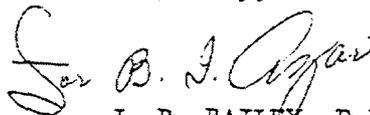
Comments on the IAS of Naval Station, Roosevelt Roads

We concur with your recommendations for more intensive sampling at the Confirmation Study sites. We made extensive revisions to the IAS sampling recommendations based on our experience with similar studies and our CS contractor's recommendations during a site reconnaissance. Our final sampling plan and proposed sampling locations for round one of the verification step are forwarded as enclosure (3). You will note that we installed three monitoring wells at Site 1, the Quebrada Disposal site, to verify the existence of contamination. Conducting a magnetometer survey at Site 9 was not possible. Apparently, that pier is a popular fishing spot on the base and the bottom is littered with soft drink cans and other debris. The CS contractor sampled sediment in 10 locations at 0-1, 1-2, and 2-3 foot depths and collected four surface water samples.

Environmental Science and Engineering, Incorporated is conducting the Phase II Confirmation Study at Sabana Seca and Roosevelt Roads. This study is divided into three steps: verification, characterization, and the development of feasible alternatives for remediation. The verification step is subdivided into three rounds of sampling. We believe three rounds of data from groundwater and surface water samples are the minimum requirement for denying the existence of contamination and deleting a site from the NACIP program or proceeding with characterization and feasibility evaluation for the site. The sampling plan and site drawings enclosed are from the first round of verification step sampling. We are currently developing the scope of work for a second round of sampling. You will be given the opportunity to review our confirmation study efforts as each step is completed and to comment on the results and recommendations for remedial action.

If you have any additional questions or concerns, our point of contact for the NACIP Program is Cheryl Barnett, (804) 445-1814.

Sincerely,



J. R. BAILEY, P.E.
Head, Environmental Quality Branch
Utilities, Energy and Environmental
Division

By direction of the Commander

Encl:

- (1) JTC Environmental Consultants Lab Report #375 of August 25, 1986
- (2) Proposed Sampling Locations at Site 7, Leachate Ponding Area, Sabana Seca
- (3) Summary Table of Step 1A Verification and Proposed Sampling Locations

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