



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP - 1 2004

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
6506 Hampton Blvd.
Norfolk, VA 23508-1278

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,
EPA I.D. Number PRD2170027203
Final TCE Plume Delineation and Source Investigation Report for SWMU 55 and
Responses to EPA's February 24, 2004 comments

Dear Mr. Cloe:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the Navy's Final TCE Plume Delineation and Source Investigation Report for SWMU 55 (the Final Investigation Report) and the Responses to EPA's February 24, 2004 comments on the Draft TCE Plume Delineation and Source Investigation Report, both submitted on behalf of the Navy by Baker Environmental's letter of August 11, 2004. As part of our review, EPA requested our contractor, Booz Allen Hamilton, to review both documents.

Our review indicates that the August 11, 2004 Final Investigation Report is acceptable. However, EPA has several points of clarification regarding the Navy's Responses to EPA's February 24, 2004 comments on the Draft TCE Plume Delineation and Source Investigation Report. While the Navy has adequately responded to the majority of EPA's February 24, 2004 comments, there are some potential issues remaining regarding the fate and transport of chlorinated solvents, which were discussed in Specific Comments 3 and 4 of the Technical Review enclosed with EPA's February 24, 2004 letter. These issues are discussed below.

1) The Navy's response to Specific Comment #3 is generally adequate. The Navy's response includes possible explanations for the differences in geochemistry observed between monitoring wells. In addition, the response acknowledges the uncertainty in the delineation of the TCE plume and the uncertainty associated with using 7MW21 as a sentinel well. The response also appears to be correct in stating that based on the levels of chlorinated solvents identified, "it is

unlikely that any migration to the [Ensenada] Honda, should it be occurring, would result in an ecological risk.” However, should the Corrective Action Objectives (CAOs) proposed in the Draft Corrective Measures Study (CMS) Final Report, indicate that contaminant levels for the well 7MW21 area to be potentially problematic, EPA reserves its rights to require further characterization and/or contaminant fate and transport analysis at that time.

2) The Navy’s response to Specific Comment #4 is not fully adequate. The response acknowledges the validity of the concerns raised by the comment. The response also indicates that, “it is likely that a combination of natural attenuation and dilution are keeping the TCE concentrations low in the downgradient area.” However, the groundwater quality data do not support the contention that natural attenuation (reductive dechlorination) is responsible for the low levels of chlorinated solvents observed in downgradient areas. The levels of daughter products (principally cis 1,2-dichloroethene [cis 1,2-DCE]) observed on site are not commensurate with the amount of degradation necessary to reduce contaminant levels to those observed in downgradient areas. Moreover, the aerobic conditions observed in groundwater are not conducive for the reductive dechlorination of TCE to occur. While the concentration levels measured at this time do not appear to warrant fate and transport modeling and/or additional plume delineation, EPA reserves its rights to require further characterization and/or fate and transport analysis of the chlorinated solvents if the CAOs proposed in the Draft CMS Final Report, when developed, indicate that may be warranted.

The above comments do not require any action at this time, but may following development of the Draft CMS Final Report for SWMU 55, which as discussed in Baker Environmental’s letter of August 11, 2004, will be submitted to EPA by October 28, 2004.

If you have any questions, please telephone me at (212) 637- 4167.

Sincerely yours,



Timothy R. Gordon,
Remedial Project Manager
Caribbean Section
RCRA Programs Branch

cc: Ms. Yarissa Martinez, P.R. Environmental Quality Board
Mr. Julio I. Rodriguez Colon, P.R. Environmental Quality Board
Ms. Kathy Rogovin, Booz Allen & Hamilton
Mr. Mark Kimes, Baker Environmental.