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November 10, 2006

U.S. Environmental Protection Agency - Region II
290 Broadway – 22nd Floor
New York, New York 10007-1866

Attn: Mr. Adolph Everett, P.E.
Chief, RCRA Programs Branch

Re: Contract N62470-02-D-3052
Navy CLEAN, District III
Contract Task Order (CTO) 121
U.S. Naval Activity Puerto Rico (NAPR)
Final RCRA Facility Investigation Work Plan for SWMU 68
Naval Activity Puerto Rico
RCRA/HSWA Permit No. PR2170027203

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is pleased to provide you with two copies of the replacement cover and spine, inside cover, text, and tables for the Draft RCRA Facility Investigation Work Plan for SWMU 68, Naval Activity Puerto Rico. These replacement pages make up the Final RCRA Facility Investigation Work Plan for SWMU 68. Directions for inserting the replacement pages into the Draft RCRA Facility Investigation Work Plan for SWMU 68 are provided for your use. Also included with the replacement pages are two electronic copies provided on CD of the Final RCRA Facility Investigation Work Plan for SWMU 68, Naval Activity Puerto Rico.

This document is submitted in accordance with the EPA comments received via e-mail from Timothy Gordon of your office on November 7, 2006 on the Draft RCRA Facility Investigation Work Plan for SWMU 68, Naval Activity Puerto Rico. The Navy responses to these comments were provided to Timothy Gordon on November 7, 2006 for review and acceptance. On November 8, 2006 Mr. Gordon informed the Navy that these responses appeared acceptable and requested that the document be submitted reflecting the responses for your review and approval. The Navy responses to EPA comments along with the final document are attached for your review and approval.

If you have questions regarding this submittal, please contact Mr. Mark E. Davidson at (843) 820-5526. Additional distribution has been made as indicated below.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Mark E. Kimes, P.E.
Activity Manager

MEK/lp
Attachments

cc: Ms. Jean Mann, NAVFAC Atlantic – Code AQ119 (letter only)
Mr. David Criswell, BRAC Program Management Office SE (letter only)
Mr. Mark Davidson, Navy BRAC PMO SE (1 hard copy and 1 CD)
Mr. Pedro Ruiz, NAPR (1 hard copy and 1 CD)
Ms. Bonnie Capito, LANTDIV – Code EV32 (1 hard copy for the Admin Record)
Mr. Tim Gordon, US EPA Region II (2 hard copies and 2 CDs)
Ms. Jennifer Nystrom, BAH (1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 CD)
Mr. Manny Vargas, PR EQB (1 hard copy and 1 CD)
Ms. Yarissa Martinez, PR EQB (1 hard copy and 1 CD)
Mr. Felix Lopez, U.S. F&WS (1 CD)
Ms. Jamie Butler, CH2M Hill Virginia Beach (1 CD)

NAVY RESPONSE TO EPA COMMENTS DATED NOVEMBER 7, 2006 ON THE DRAFT RCRA FACILITY INVESTIGATION WORK PLAN FOR SWMU 68 DATED OCTOBER 25, 2006

BAH TECHNICAL REVIEW OF THE DRAFT RCRA FACILITY INVESTIGATION WORK PLAN, SWMU 68, NAVAL ACTIVITY PUERTO RICO, CEIBA, PUERTO RICO DATED OCTOBER 25, 2006.

I. GENERAL COMMENTS

1. Booz Allen Hamilton (Booz Allen) has reviewed the October 25, 2006, Draft RCRA Facility Investigation (RFI) Work Plan (WP) for Solid Waste Management Unit (SWMU) 68 at the Naval Activity Puerto Rico (NAPR) facility in Ceiba, Puerto Rico. SWMU 68 addresses the former Southern Fire Training Area, which was previously identified as Environmental Condition of Property (ECP) Site 14. As requested by the EPA Work Assignment Manager (WAM), this review was largely limited to:

   - Confirming that the RFI WP included the entire scope of work (e.g., sample locations, depths, analytical constituents) discussed in e-mail correspondence between Tim Gordon of EPA and Mark Davidson of the Navy, dated October 19 through 23, 2006
   - Verifying that the quality assurance/quality control (QA/QC) and data validation protocols are acceptable
   - Evaluating the acceptability of using concentrations equal to two times established background levels as a screening tool for detected inorganic constituents in soil.

   Overall, the document appears acceptable and in accord with the scope of work agreed upon between EPA and the Navy. Only a few issues require further clarification, as presented in the comments below. Because field work is scheduled to begin in mid-November, we recommend that the Navy provide written responses to each comment for EPA review as soon as possible. Assuming that those responses are acceptable, finalization of the RFI WP can be accomplished on a schedule that does not impact the proposed field work schedule.

Navy Response to EPA Region II Comment

Comment noted. Please see the Navy responses to Booze Allen Technical Review below.

II. SPECIFIC COMMENTS ON THE DRAFT RFI WP

Booze Allen Specific Comment 1

Section 3.4.2, Equipment Rinsates

1. The second paragraph of this section indicates that NAPR expects to collect a total of two equipment rinsate samples during the proposed SWMU 68 investigation. However, no sampling rate is specified. Section 3.4.1 of EPA's Test Methods for Evaluating Solid Waste, Physical/Chemical Methods Manual (SW-846) states that one equipment rinsate sample should be collected per day for each matrix being sampled. An EPA Region 3 fact sheet on quality control blanks dated November 15, 2001 (available at:

www.epa.gov/region3/esc/QA/Blanks_QC_Tools.pdf) further stipulates collection of one equipment rinsate sample per day per matrix or one for every 20 samples per matrix, whichever is more frequent. As such, the quantity of equipment rinsate samples to be collected during the proposed field effort is dependent on the number of sampling days and the final tally of samples collected. Furthermore, because samples are to be collected from three separate media using three different types of sampling equipment (i.e., stainless steel spoons for surface soil, split spoon samplers or macro core liners for subsurface soil, polyethylene and silicon tubing for groundwater), it would seem appropriate to collect at least three equipment rinsate samples during the course of this investigation. Revise the RFI WP to specify the proposed rate of equipment blank collection in accordance with EPA guidance; and note that the total quantity of equipment blanks will be dependent on the number of field days, the final environmental sample count, and the various media to be sampled.

Navy Response to Booze Allen Specific Comment 1:

Section 3.4.2 of the RFI work plan will be revised to specify a minimum of three equipment rinsate samples and reference EPA guidance for the proposed rate. The total number of equipment rinsates blanks will be dependent on the number of field days, the final sample count, and the various media sampled. In addition, Table 3-3 will be revised to include a minimum of three equipment rinsate samples during this investigation.

Booze Allen Specific Comment 2

Table 3-1, Summary of Sampling and Analytical Program

2. Add a footnote to this table indicating that, although only two subsurface soil samples have been listed per boring, additional subsurface soil samples will be collected if areas of staining or other indicators of contamination are encountered at multiple depths. In that event, the number of QA/QC samples outlined in Section 3.4 and listed on Table 3-3 will also be adjusted accordingly.

Navy Response to Booze Allen Specific Comment 2:

This footnote will be added to Table 3-1.

Booze Allen Specific Comment 3

Table 3-2, Method Performance Limits for Volatile Organic Compounds

3. Sample preparation for volatile organic compounds in this table should be updated to reference method SW5030B, the most current version of the method specified in EPA's online SW-846 test methods manual (available at: www.epa.gov/epaoswer/hazwaste/test/ main.htm).

Navy Response to Booze Allen Specific Comment 3:

Table 3-2 will be revised to reflect the most recent version of the methods listed above.

Booze Allen Specific Comment 4

Section 6.1, Project Team Responsibilities

4. A minor typographical error was noted in the second sentence of this section. The reference to Ms. Staszak should be corrected to state that Ms. Butler will provide senior technical review of project deliverables and monitor schedule and budget for this project.

Navy Response to Booze Allen Specific Comment 4:

Section 6.1 to the RFI WP will be revised to reference Ms. Butler.

III. EVALUATION OF SCREENING INORGANIC CONTAMINANT CONCENTRATIONS AGAINST TWICE ESTABLISHED BACKGROUND LEVELS

1. The inorganic results for surface and subsurface soils from the previous ECP investigation have been screened against two times background values that were established in a preliminary draft of the Summary Report for Environmental Background Concentrations of Inorganic Compounds (Summary Background Report). The Revised Final Summary Background Report was recently issued on October 17, 2006. In the Revised Final Summary Background Report, the background data set has been modified and the Navy adopted an alternate approach to screening against two times background values. The screening values adopted in the Revised Final Summary Background Report for arsenic (surface soil), chromium (surface and subsurface soil), and vanadium (surface and subsurface soil) are less than two times the background values used to screen these inorganic soil concentrations in the previous ECP Report[1] (Tables 5-48 and 5-50). Thus, the previously used soil screening values are not as conservative as those currently established in the October 17, 2006, Revised Final Summary Background Report. However, inspection of the actual inorganic soil concentrations reported in the previous ECP Report indicate that inorganic soil concentration measurements in question are not only lower than two times the background values initially used for screening, but are also lower than the screening values established in the Revised Final Summary Background Report. Consequently, revision of the previous soil data background screening does not appear to be necessary.

Comment noted.

[1] Final Phase I/II Environmental Condition of Property, Former U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico. Prepared by Naval Facilities Engineering Command Atlantic (NAVFAC Atlantic). Dated July 2005.