



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

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 (former Naval Station Roosevelt Roads) - EPA I.D. Number
PRD2170027203

1. SWMU 14 - Response to Comments and RCRA Facility Investigation (RFI) Work Plan
2. Response to Comments and Final Work Plan for Soil Remediation at Various Sites (SWMUs 9, 13, 46/AOC C, and 53)

Dear Mr. Cloe:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the above documents which were submitted on behalf of the Navy by your contractors, Baker Environmental's letter of November 11, 2005 and CAPE's letter of November 15, 2005.

As part of our review, EPA requested our contractor, Booz Allen Hamilton, to review both documents. Based on Booz Allen's and our own reviews, EPA has determined the following:

SWMU 14 - Response to Comments and RFI Work Plan

The November 2005 Final RFI work plan is largely acceptable. However, prior to EPA's final approval, as discussed in the enclosed Technical Review, several items need to be clarified with regard to the 1995 Health and Safety Plan (HASP), the Schedule, and several editorial type issues (refer to BAH General Comment 1). These items may be addressed in a supplemental Response to Comments and/or addendum to the work plan. Please submit that supplemental Response and/or addendum to the work plan, addressing all comments in the enclosed Technical Review, within 25 days of your receipt of this letter.

Final Work Plan for Soil Remediation at Various Sites (SWMUs 9, 13, 46/AOC C, and 53)

Based on Booz Allen's and our own reviews, EPA has determined that the November 2005 Final Work Plan is conditionally acceptable, subject to the following:

- 1) the schedule given in Appendix G of the Work Plan being replaced with the schedule sent to me by Mr. John Thomas' Email of November 29, 2005 (however, you do not need to re-submit the Work Plan);
- 2) submission to EPA of a draft Final Report on implementation of the November 2005 Final Work Plan within 60 days of completion of all activities shown on the schedule sent by Mr. Thomas' Email of November 29, 2005 (the November 29th revised schedule includes no schedule for reporting to EPA); and
- 3) public review of the November 2005 Final Work Plan (revised as per 1 above), as part of the planned public review of the proposed Administrative Order between EPA and the Navy.

For the draft Final Report on implementation of the November 2005 Final Work Plan, please submit two paper copies and two CDs to EPA's RCRA Programs Branch and 1 paper copy and 1 CD to Mr. Carl Soderberg of EPA's Caribbean Environmental Protection Division (San Juan, PR) and the same to both Ms. Yarissa Martinez and Mr. Julio I. Rodriguez Colon of the Puerto Rico Environmental Quality Board

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

Enclosure

- cc: Ms. Yarissa Martinez, P.R. Environmental Quality Board, with encl.
Mr. Julio I. Rodriguez Colon, P.R. Environmental Quality Board, with encl.
Lieutenant Commander A. Ferguson, Assistant Officer in Charge, Naval Activity Puerto Rico, with encl.
Mr. Felix Lopez, U.S. Fish & Wildlife Service, with encl.
Mr. Mark Kimes, Baker Environmental, with encl. ✓
Ms. Kathy Rogovin, Booz Allen & Hamilton, w/o encl.

**TECHNICAL REVIEW OF THE
FINAL RCRA FACILITY INVESTIGATION WORK PLAN FOR SWMU 14
FIRE TRAINING PIT AREA**

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO**

**REPA3-2203-069
November 23, 2005**

EPA COMMENT

1. The response to this comment is partially acceptable in that the RFI Work Plan now makes specific reference to Health and Safety Plan (HASP) prepared in 1995. However, in this comment, EPA also requested confirmation that the 1995 HASP: a) addresses all potential exposures at Solid Waste Management Unit (SWMU) 14; b) reflects current site conditions at the NAPR facility; and c) complies with all currently applicable Occupational Safety and Health Administration (OSHA) requirements. Although Section 2.3 of the Work Plan has been revised to reference the 1995 HASP, the text only indicates that this HASP is "still relevant". More definitive and detailed language should be provided with respect to EPA's above referenced concerns.

BAH GENERAL COMMENTS

1. The response to this comment is largely acceptable, however several minor omissions and errors were noted in the response and/or the revised Work Plan text and figures.
 - The legend for Figure 3-1 should be revised to indicate that only the sampling locations shown in red are proposed for this portion of the investigation. Sampling locations shown in orange were completed in 1995 and 1996.
 - In accordance with the expanded scope of investigation, the first paragraph in Section 3.2 should be expanded to note that a temporary well will also be installed at the Temporary Fire Training Pit location.
 - The rationale for the proposed sampling locations is provided in Section 1.2 of the Work Plan, rather than Section 1.1, as stated in the response.
2. The response to this comment is acceptable.
3. The response to this comment is acceptable. However, after analyses are completed, NAPR should review actual quantitation limits calculated by the laboratory to be sure that they are sufficiently low (i.e., below applicable human health risk-based concentrations or ecological screening criteria). If not, an evaluation of those

constituents should be conducted to assess whether they are actually present at levels of concern, and associated discussion should be provided in the RFI Report.

BAH SPECIFIC COMMENTS

Section 1.0, Introduction

1. The response to this comment is acceptable.

Section 2.3, Previous Investigations

2. The response to this comment is acceptable.

Section 3.5.2, Investigation Derived Wastes (IDW)

3. The response to this comment is acceptable.

Section 3.5.3, Decontamination

4. The response to this comment is acceptable.

Section 4.0, Reporting

5. The response to this comment is acceptable.

Section 5.2.2, Data Summary

6. The response to this comment is acceptable.
7. The response to this comment is acceptable.

Section 5.2.3, Identifying Chemicals of Potential Concern

8. The response to this comment is acceptable.

Section 7.0, Schedule

9. The response to this comment is acceptable, but there appears to be a significant error on the revised schedule. According to Figure 7-1, field work (Task 9) will commence on January 5, 2006, but the field investigation (Subtask 10) will not begin until February 1, 2006. Because no explanation is provided for the delay, and the mobilization effort should not be significant, this discrepancy appears to be a simple typographical error. Accordingly, the schedule should be revised to also show Subtask 10 beginning on January 5, 2006, as the first component of Task 9.

10. The response to this comment is acceptable.

Section 8.1. Project Team Responsibilities

11. The response to this comment is acceptable.

Table 3-2. Method Performance Limits

12. The response to this comment is acceptable.

PR EQB COMMENTS

13. The response to this comment is acceptable.

14. See the response to EPA Comment 1 above.

15. The response to this comment is acceptable.