

6/13/06-01235



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN 13 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark E. Davidson
US Navy
BRAC PMO SE
P.O. Box 190010
North Charleston, SC 29419-9010

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,
EPA I.D. Number PR2170027203,

Work Plan to Conduct Phase I RCRA Facility Investigation (RFI) at Pineros and Cabeza
de Perro Islands, dated May, 2006.

Dear Mr. Davidson:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the Navy's May 2006 Work Plan to Conduct a Phase I RCRA Facility Investigation (RFI) at Pineros and Cabeza de Perro Islands ("the Work Plan"). Our review included a review by EPA Region 2's contractor, Booz Allen, whose comments are given in the enclosed Technical Review. In addition to those given in the Technical Review enclosed with this letter, EPA has the following comments:

- 1) Figure 1-4 shows a structure labeled "Storage Facility", yet no discussion of the nature of what was stored there is given. Please discuss what activities occurred at this "Storage Facility", including a discussion of whether materials or wastes that contained hazardous constituents were stored there.
- 2) Revise the title of Section 3.5.1 (pg 3.5) to Soil Sampling Program (instead of Field Operations).
- 3) Revise Section 3.5.1 (pg 3.5 and 3.6) to include soil sample locations at the "Storage Facility" and the Bivouac Area, both of which are shown on Figure 1-4. Also, increase the number of samples for VOCs, SVOCs, Pesticides/PCBs, and RCRA metals to at least 9 environmental sampling locations and to include: two samples each at both the Storage Facility and the Bivouac

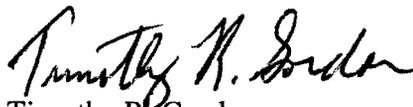
Area, plus two samples (instead of 1) at the currently proposed helicopter pad, one sample at each of the 2 crab trap areas, and one background sample. Also, add a discussion indicating that the soil samples for explosive residues will be distributed over various sites/locations, and not be concentrated at a limited number of sites. Since the document is now a Phase I RFI Work Plan, as opposed to a PA/SI Work Plan as previously titled, these modifications and the additional sampling are important. A Phase I RFI is for a screening investigation/sampling program to determine whether or not a release or releases requiring further investigation is/are indicated, whereas a PA/SI is for a pre-investigation evaluation.

4) Revise Section 1.2 (pg. 1-2) as follows: In third sentence, put a period after determination, and delete the rest of that sentence.

Within 25 days of your receipt of this letter, please submit an addendum to the Work Plan or a revised Work Plan, which addresses all comments given above and in the enclosed Technical Review. However, as EPA understands that the Navy may commence implementation of the Work Plan imminently. Comments given above and in the enclosures should be followed during such implementation, pending submission to EPA of an acceptable addendum or a revised Work Plan.

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, w/encl.
Mr. Julio I. Rodriguez Colon, P.R. Environmental Quality Board, w/encl.
Lt. Commander A. Ferguson, Naval Activity Puerto Rico, w/encl.
Kevin Cloe, LANTDIV, w/encl.
Mr. Felix Lopez, USF&WS, w/encl.
Ms. Kathy Rogovin, Booz Allen & Hamilton, w/o encl.