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May 27, 2011

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 N62470-10-D-3000
IQC for A/E Services for Multi-Media
Environmental Compliance Engineering Support
Delivery Order (DO) JM01
U.S. Naval Activity Puerto Rico (NAPR)
EPA I.D. No. PR2170027203
Revised Final Phase I RCRA Facility Investigation Work Plan for SWMU 80

Dear Mr. Everett:

Michael Baker Jr., Inc. (Baker), on behalf of the Navy, is pleased to provide you with one hard copy of the replacement pages for the Final Phase I RCRA Facility Investigation Work Plan for SWMU 80, Naval Activity Puerto Rico for your review and approval. These replacement pages make up the Revised Final Phase I RCRA Facility Investigation Work Plan for SWMU 80. Directions for inserting the replacement pages into the Final Phase I RCRA Facility Investigation Work Plan for SWMU 80 are provided for your use. Also included with the copy of the replacement pages is one electronic copy provided on CD of the Revised Final Phase I RCRA Facility Investigation Work Plan for SWMU 80.

This document is being submitted in accordance with EPA comments dated March 11, 2011. The Navy's responses to these comments are attached for your review. Additional distribution has been made as indicated below.

If you have questions regarding this submittal, please contact Mr. Mark Davidson at (843) 743-2124.

Sincerely,
MICHAEL BAKER JR., INC.

Mark E. Kimes, P.E.
Activity Coordinator

MEK
Attachments

cc: Ms. Debra Evans-Ripley, BRAC PMO SE (letter only)
Mr. David Criswell, BRAC PMO SE (letter only)
Mr. Mark E. Davidson, BRAC PMO SE (1 hard copy and 1 CD)
Mr. Pedro Ruiz, NAPR (1 CD)
Mr. Tim Gordon, US EPA Region II (1 hard copy and 1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy and 1 CD)
Ms. Bonnie Capito, NAVFAC Atlantic – Code EV42 (1 hard copy for Administrative Record)
Ms. Gloria Toro, PREQB (1 hard copy and 1 CD)
Ms. Wilmarie Rivera, PREQB (1 CD)
Mr. Felix Lopez, US F&WS (1CD)
Ms. Brenda Smith, TechLaw, Inc. (1 CD)

NAVY RESPONSES TO EPA COMMENTS DATED MARCH 11, 2011
FINAL PHASE I RCRA FACILITY INVESTIGATION WORK PLAN
SWMU 80 (DRAINAGE DITCH NEAR BUILDING 207) DATED NOVEMBER 24, 2010

(Regulator comments are provided in italics, while the Navy responses are provided in regular print.)

EPA COMMENTS

GENERAL COMMENTS

General Comment 1: *The Work Plan is lacking several elements required by EPA Requirements of Quality Assurance Project Plans (QAPP), dated March 2001 (QA/R-5). These elements are necessary to evaluate the proposed Work Plan:*

- *Laboratory specific information including standard operating procedures, method detection limits, reporting limits (RLs), quality control (QC) acceptance limits, analytical calibration procedures and acceptance criteria, and corrective actions should the calibration/QC criteria be exceeded must be provided for the currently proposed analytical methods. Ensure that laboratory RLs are provided alongside the screening values.*

- *Project specific completeness goals for both the field and laboratory have not been provided. In addition, the Work Plan does not indicate if any proposed samples are deemed critical to this investigation.*

- *There is no project specific discussion of how precision, accuracy, representativeness, comparability and completeness and sensitivity (PARCCS) measures will be incorporated into a data quality assessment (DQA), how completeness will be measured for this project, or if an evaluation of significant trends and biases will be included as part of a DQA.*

Revise the Work Plan to provide this information.

Navy Response: The Navy plans to implement this investigation at NAPR in accordance with the EPA approved Master Project Management Plan (PMP), Master Data Collection Quality Assurance Plan (DCQAP), Data Management Plan (DMP), and Master Health and Safety Plan (HASP) for NAPR (Baker, 1995. Final RCRA Facility Investigation Management Plans, Naval Station Roosevelt Roads, Ceiba, Puerto Rico. September 14, 1995. Coraopolis, Pennsylvania.) The EPA approved the work plan on September 25, 1995. These Master Plans define acceptable data requirements and error levels associated with the field and analytical portions of this investigation. Therefore, to maintain consistency with past Navy work under the Consent Agreement, this work plan has been revised using the Navy's EPA approved Master Plans for this facility.

In response to previous comments by the EPA on Phase I RFI Work Plans for SWMUs 62 and 71 (see the April 17, 2008 letter from Baker on behalf of the Navy to the EPA); the Navy provided an evaluation of the Master Project Plans (Baker, September 14, 1995) in relation to the QA/R-5 requirements ("EPA Requirements for Quality Assurance Project Plans." EPA/240/B-01/003. [EPA, March 2001]). Table 1 of the April 17, 2008 letter provides a map between the DCQAP sections, the work plan content and the sections required by QA/R-5 and illustrates that although there are format and minor content differences, the DCQAP is generally consistent with and includes all of the main elements required by QA/R-5. For example, data validation is discussed in Section 10 of the DCQAP and PARCCS measures are discussed

in Section 4 of the DCQAP; and forms and checklists are provided in the tables and appendices of the DCQAPP. Some additional examples of forms and checklists that may be found in the DCQAP are shown in the following table:

Item	Location in the DCQAP
System Audit Checklist	Table 12-1
Test Boring Record	Appendix B – SOP F101 – Borehole and Sample Logging
Typical Monitoring Well Construction Details and Test Boring and Well Construction Records	Appendix B – SOP F103 – Monitoring Well Installation
Chain of Custody Form	Appendix B – SOP F302 – Chain of Custody
Sample Label	Appendix B – SOP F302 – Chain of Custody
Data Validation Checklists	Appendix D – Data Validation Methodologies

There are a number of new forms that are integrated into the updated standard operating procedures included as Appendix C of the Phase I RFI Work Plan for SWMU 80. These forms include well installation log, groundwater sampling, and the instrument calibration record.

The analytical methods, analyte lists, detection limits, etc. may have changed to some degree since publication of the DCQAP. Consequently, the Phase I RFI Work Plans contain the following tables specifying the sampling and analytical program requirements so that data of sufficient quality for future risk management decisions is collected:

- Table 3-1 Summary of Sampling and Analytical Program – Environmental Samples
- Table 3-2 Summary of Sampling and Analytical Program – QA/QC Samples and IDW Samples
- Table 3-3 Method Performance Limits

The information provided in these tables has been reviewed against screening levels and have been determined to generally meet these levels. Table 3-3 has been revised to include preparation methods. Soil screening values are presented on Tables 4-1. Groundwater and surface water screening values are presented on Table 4-2. In addition, a table with sediment screening values (Table 4-3) and human health screening values (Table 4-4) were added for easy comparison to the analytical method detection limits. These quantitation limits have also been reviewed by an analytical laboratory to ensure that they can be met. In all cases, the quantitation limits are the lowest achievable by the laboratory for the specified analytical method. These tables are then provided to the analytical laboratory subcontractor as part of their scope of work so that the laboratory is clearly aware of the analytical requirements of the project. Additionally, only laboratories capable of providing an acceptable Laboratory Quality Manual (LQM) will be selected for this project. The LQM will be provided on request (after selection of the analytical laboratory).

This evaluation (presented in the April 17, 2008 letter), which was approved by EPA on May 13, 2008, indicated that the Phase I RFI Work Plan structure, with reference to the 1995 Master Project Plans and inclusion of project-specific tables summarizing the sampling and analysis program for environmental and QA/QC samples and method performance limits, and other factors as discussed in the April 17, 2008 letter, when taken together provide the information and guidance necessary for the project team to generate good quality data and to use that data for developing risk management based recommendations and decisions. The structure of the Phase I RFI Work Plan for SWMU 80 is in accordance with the QA/R-5 QAPP requirements.

EPA Evaluation of the Response to EPA General Comment 1: *The response partially addresses the comment. However, because the laboratory has not been selected, laboratory specific standard operating procedures (SOPs), quality control (QC) limits, and quantitation limits (QLs) have not been included in the Work Plan. Additionally, Table 3-3 states that the QLs listed for soil are based on wet weight and that the quantitation limits calculated by the laboratory on a dry weight basis will be higher. Since screening levels are based on dry weight calculations, it is unclear whether the chosen laboratory's dry weight QL will be able to meet screening levels. Ensure that when a laboratory is selected, laboratory specific SOPs, QC limits, and QLs are included in the draft Phase I RFI Report as an addendum. Also, in the draft Phase I RFI Report clarify how it was ensured that the laboratory was able to meet screening levels when reporting results are on a dry weight basis.*

Navy Response: As indicated in our previous response, to help ensure that screening levels are met, required quantitation limits are provided to the laboratory as part of their contractual scope of work. Upon the selection of the subcontracted analytical laboratory for this investigation, laboratory specific SOPs and QC limits will be reviewed to confirm they will be able to meet the applicable screening levels. The analytical laboratory's specific SOPs, QC limits, and QLs will be included as an appendix to the Draft Phase I RFI Report. Additionally, upon further review of Table 3-3, it was discovered that outdated QLs were included in error for SW-846 Method 6020A (ICP/MS) analysis of groundwater. Therefore, Table 3-3 has been revised to include the most current QLs available for Method 6020A.

General Comment 2: *A data quality objective (DQO) section should be provided in the Work Plan. The DQO section should clearly define the problem and the environmental questions that should be answered for the current investigation. Project decision "If…, then…" statements should be developed, linking data results with possible actions. The DQOs should also identify the type, quantity, and quality of data needed to answer the study questions. The following information should be added to the Work Plan so that complete DQOs are presented:*

- *Provide project decision conditions ("If…, then…" statements) for each matrix and/or decision area.*
- *Provide the rationale for the proposed number of samples for each area of interest, matrix, and interval. In addition, provide the rationale for the proposed type of sample (e.g., grab samples vs. composite samples as well as random samples vs. judgmental samples). The rationale should provide sufficient detail to explain why each of these will address the environmental questions being asked.*

Revise the Work Plan to include this information.

Navy Response: Although the seven-step DQO process was not applied rigorously, elements essential to the process (with the exception of statistically determining the number of samples) have been considered in the development of the sampling design. Because the investigation is designed to determine if impacts have occurred to soil, sediment, groundwater or surface water at the site, the sample locations have been selected to reflect the most likely impacted areas based on site history and professional judgment. All samples are grab samples with locations biased towards meeting the project objective of determining the presence of contamination. Detailed sampling rationale, including the number and location of samples from each media, specific rationale for each sample, sampling procedures, and associated laboratory analyses is provided in Section 3 of the SWMU 80 Phase I RFI Work Plan.

Project decision conditions include comparing analytical data to human health-, ecological-, and background-based screening values. Exceedances of human health and/or ecological screening values and background screening values will result in a recommendation of additional sampling locations under the Full RFI Work Plan to further delineate the site. Human health and ecological risk assessments will not be conducted as part of the Phase I RFI or Full RFI. The Full RFI Work Plan will be developed with

input from Phase I RFI data, our human health and ecological risk assessors to assure that the investigation will provide the data that is needed for future risk management decisions. The human health and ecological risk assessors review the sampling (number, frequency, location and collection methods) and analytical programs (analytical methods, parameter lists, detection limits) and compare applicable screening values to method performance limits to maximize the usability of the resultant data. The decision criteria for this project (comparison of environmental media analytical results to screening criteria), will be discussed extensively in Sections 4.6.1, 4.6.2 and 4.6.3 of the Full RFI Work Plan. Additional data quality criteria is provided in Section 4.1.1.2 (data quality levels) and Section 14.3 (data completeness and other criteria) of the approved final DCQAP. Based on the above, no revisions to the text of the Phase I RFI Work Plan for SWMU 80 are required.

EPA Evaluation of the Response to EPA General Comment 2: *The response partially addresses the comment. However, the decision process behind the selection of sample locations and depths and why it will address study goals is not clearly stated. In the draft Phase I RFI Report, when developed, include a more specific rationale behind why the number and locations of samples is sufficient to meet study goals.*

Navy Response: For clarification purposes, the rationale behind why the number and locations of samples will meet study goals has been added to Section 3.0 of the Phase I RFI Work Plan.

In order to understand if Building 207 is a potential source, four monitoring wells will be situated around the building. One monitoring well will be placed at the southwest and southeast corners of the building (80SB02 and 80SB04 respectively). Two additional monitoring wells will be placed northwest and northeast of Building 207 (80SB01 and 80SB03 respectively). These two wells will also be located between the two streams to better identify potential source areas. The monitoring well placed at location 80SB05 will be placed topographically up gradient from staining associated with a groundwater seep immediately northeast of Building 207. Monitoring well 80SB06 will be placed north-northwest of Building 207 as groundwater flow control point and as a potentially up gradient groundwater sample location. Sampling frequency and analysis are discussed in Section 3.3.

To further understand if Building 207 is a potential source, twelve soil borings will be advanced to collect and analyze surface/subsurface soil. The proposed location of the borings was designed to capture surface and subsurface soil from around and down gradient of Building 207. The proposed number of borings will give a statistical significant number if a risk assessment is necessary. The proposed groundwater monitoring well locations (80SB01 through 80SB06) will be used to collect surface and subsurface soil. To augment the aerial coverage given by the six groundwater monitoring well locations, six additional soil borings are proposed. Four soil borings (80SB08, 80SB10, 80SB11, and 80SB12) are proposed to help delineate the soil between the building and first drainage ditch. Two additional soil borings (80SB07 and 80SB09) are proposed between the two drainage ditches to further delineate the aerial extent between the ditches. Sampling frequency and analysis are discussed in Section 3.1.

The proposed sediment sample locations are intended to delineate the extent of contamination in drainage ditch sediment. The up gradient portion of the drainage ditch closest to Building 207 was not characterized during September 2008 and June 2009 sampling events. Therefore, two sediment samples (80SD01 and 80SD02) will be collected in the up gradient portion of the drainage ditch closest to Building 207. One sediment sample (80SD03) will be collected to characterize the down gradient ditch between previously collected sediment samples 56AASD10 and 56SD11. All sediment samples will be collected from depositional deposits. The analytical results of the sediment samples will supplement the results from previous investigations. Sampling frequency and analysis are discussed in Section 3.4.

Previous investigations have not determined potential impacts to surface water quality. Therefore, six surface water samples are proposed to screen potential impacts to surface water quality. The proposed sample locations were selected to initially determine water quality throughout the drainage ditch system. Sampling frequency and analysis are discussed in Section 3.5.

General Comment 6: *MCLs are not solely risk-based. Groundwater exceedances of risk-based screening criteria warrant an HHRA unless land use controls and/or institutional controls are in place at SWMU 80 to prevent consumption of groundwater (e.g., restrictions on residential development). Further, if a HHRA is warranted and conducted as part of the CMS, groundwater COPCs should be selected based on comparison of analytical results to the applicable Tap Water Regional Screening Level (RSL) and not the MCL. Revise the Draft RFI Work Plan to update Section 4.6.2, Human Health Screening Values, and update Section 4.6.2.2, Federal Drinking Water MCLs, or provide adequate justification for not doing so.*

Navy Response: MCLs will be used only as one of the screening tools in the Phase I RFI. As indicated in Section 4.6.2, USEPA Regional Tap Water SLs and inorganic background levels also will be used for groundwater screening in the Phase I RFI for SWMU 80. It is acknowledged in Section 4.6.2.2 that MCLs are not solely risk-based. Note that it is not the objective of the Phase I RFI to evaluate the potential for human health risks. Further evaluation of the potential for human health risks will be conducted as part of a CMS investigation. In HHRAs conducted for NAPR, only risk-based screening criteria are used in the COPC selection process. As such, MCLs are not used to identify groundwater COPCs. No revisions to the text of the Phase I RFI Work Plan for SWMU 80 are required.

EPA Evaluation of the Response to EPA General Comment 6: *The Navy's response does not fully address the intent of EPA General Comment 6. EPA and TechLaw are aware that Section 4.6.2, Human Health Screening Values, indicates that Tap Water Regional Screening Levels (RSLs) will be used in the Full RFI screening for groundwater, but acknowledges that Maximum Contaminants Levels (MCLs) will also be used. The intent of EPA General Comment 6 was to recommend that where EPA Tap Water RSLs are more protective than MCLs, EPA Tap Water RSLs be used in determining and delineating the nature and extent of contamination in groundwater. Given that a human health risk assessment (HHRA) will not be conducted as part of the RFI, it is important the RFI data evaluation confirms or justifies the decisions about whether or not SWMU 80 will be recommended for a CMS. It is recommended that such justifications be risk-based for all media; therefore, the use of EPA Tap Water RSLs rather than MCLs (when EPA Tap Water RSLs are more protective) is recommended. While MCLs are the regulatory limit, delineating to the EPA Tap Water RSL, when RSLs are more protective than MCLs, will allow for a more protective data evaluation in the RFI in support of a decision for/against performing a CMS. In the draft Phase I RFI Report, when developed, clarify that EPA Tap Water RSLs were used to delineate any groundwater contamination when EPA Tap Water RSLs are more protective than MCLs, or alternatively, provide justification for not following this approach.*

Navy Response: The Navy concurs with this comment. Groundwater analytical data generated as part of the Phase I RFI investigation will be compared to MCLs, Tap Water RSLs and background (where applicable for selected metals); the most stringent of these for a given parameter will be used as the basis for delineating groundwater contamination. The first paragraph of Section 4.6.2 was revised to state the following:

In the case of groundwater comparison to human health screening criteria conducted as part of the Phase I RFI, the Regional Tap Water SLs will be used to delineate the nature and extent of contamination in groundwater when the Regional Tap Water SLs are more protective than MCLs.

General Comment 7: *Ensure that contract-required quantitation limits (QLs) are low enough to meet human health and ecological screening criteria. Revise the Work Plan to show that QLs will be low enough to meet data quality standards for risk assessment purposes. The requested revision can be easily addressed by updating tables to compare the QLs to applicable human health and ecological screening values.*

Navy Response: The human health screening values (Regional Screening Levels and MCLs) are provided in Table 4-4 and ecological screening values are provided in Tables 4-1 to 4-3. The information provided in Table 3-3 has been reviewed against project-specific screening levels and has been determined to generally meet these levels. The quantitation limits have also been reviewed by an analytical laboratory to ensure that they can be met. In all cases, the quantitation limits are the lowest achievable by the laboratory for the specified analytical method. The project-specific screening values are then provided to the analytical laboratory subcontractor as part of their scope of work so that the laboratory is clearly aware of the analytical requirements of the project.

EPA Evaluation of the Response to EPA General Comment 7: *The response is partially adequate. The Work Plan has been revised to include the human health screening values (i.e., Regional Screening Levels [RSLs] and Maximum Contaminant Levels [MCLs]) in Table 4-4. However, it is noted the footnotes reference the May 2010 RSLs. Note that the RSLs were updated in November 2010. Ensure that the most current RSLs are used in the draft Phase I RFI report, when developed.*

Navy Response: The first footnote on Table 4-4 has been revised to include the following statement:

> The most current version of the RSLs available at the time the SWMU 80 Phase I RFI is completed will be used for screening purposes.

SPECIFIC COMMENTS

Specific Comment 3: *Section 3.2, Monitoring Well Installation, Page 3-3: The text states that the wells will be developed until the discharged water runs relatively clear of fine-grained materials. The text further indicates that typical limits placed on well development may include any one or a combination of the following: clarity of water based on visual determination; a maximum time period; a maximum borehole volume; stability of pH, specific conductance, and temperature measurement; and, clarity based on turbidity measurements. Since the clarity of the water is a qualitative measure that could be subjective based on the person making the observations, ensure that this is not the only limit used in well development. Revise the Work Plan to indicate that at least one of the other limits will be placed on well development in conjunction with visual observation of water clarity, should it be used.*

Navy Response: Section 3.2 third bullet item states that one of the limits placed on well development, in addition to a visual inspection of clarity, is a maximum borehole volume (typically three to five borehole volumes plus the amount of any water added during the drilling or installation process). No revisions to the text of the Phase I RFI Work Plan for SWMU 80 are required.

EPA Evaluation of the Response to EPA Specific Comment 3: *The response is not adequate. The text implies that clarity of water based on visual determination may be the only limit placed on well development. Please submit a written addendum to the Phase I RFI work plan to clarify that during well development, clarity of water based on visual observation may be used in conjunction with other limits, but not as a sole limit, and discuss other criteria that may be utilized.*

Navy Response: The well development discussion in Section 3.2 of the Phase I RFI Work Plan has been revised as follows:

> Typical limits placed on well development will include clarity of water based on visual determination and any one or a combination of the following:
>
> - A maximum time period (typically two hours for shallow wells).
> - A maximum borehole volume (typically three to five borehole volumes plus the amount of any water added during the drilling or installation process).
> - Stability of pH, specific conductance, and temperature measurements (typically less than ten percent change between three successive measurements).
> - Clarity based on turbidity measurements (typically less than 20 Nephelometric Turbidity Units [NTU]).

Specific Comment 7: *Section 3.5, Surface Water Sampling and Analysis Program, Page 3-5: This section indicates that samples will be obtained by filling sample bottles directly with surface water. While this may be acceptable, it should be noted that sample bottles should not be directly filled if they are pre-preserved. Revise the Work Plan to clarify if sample bottles will be pre-preserved, and if so, how the samples will be collected.*

Navy Response: Surface water sampling techniques have been added to Section 3.5 which includes sampling with pre-preserved containers.

EPA Evaluation of the Response to EPA Specific Comment 7: *The response partially addresses the comment. However, volatile organic compound (VOC) samples require overfilling to form a meniscus to eliminate bubbles which cannot be achieved by filling the sample bottle directly with the surface water. Please submit a written addendum to the Phase I RFI work plan that clarify that such a procedure is followed during VOC sample collection, or provide an alternate method to collect VOC samples that will eliminate air bubbles.*

Navy Response: Additional surface sampling techniques have been added to Section 3.5; more specifically the following bullet within Section 3.5 has been revised:

- Care shall be taken to avoid excessive agitation of the water which may result in the loss of volatile constituents. Additionally, samples for volatile organic analyses will be collected first, followed by the samples for other constituents. Dipper equipment shall be used for VOC sample collection. Dippers are uncomplicated in construction, simple to use, and relatively easy to decontaminate. Samples obtained with the dipper shall be poured into an appropriate pre-preserved container (VOA vial) with minimal air contact and agitation. When filling the appropriate pre-preserved VOC vial, a meniscus will be formed before capping the container to eliminate air entrapment.

Specific Comment 13: *Section 4.0, Reporting, Pages 4-1 through 4-9: This section does not indicate that a DQA will be included in the final report. Revise this section to specify that a DQA will be part of the final report, and specify what will be included in the DQA (e.g., an evaluation of PARCCS, significant trends and biases, comparing data to DQOs to ensure questions were addressed, etc.).*

Navy Response: The following statement will be added to Section 4.7:

All data from the laboratory will be certified by a Puerto Rican Chemist and laboratory data will be validated to ensure data usability. Only usable data will be included in the evaluation and the conclusions and recommendations sections of the report. Data validation reports will be included as an appendix to the Phase I RFI report and will discuss:

- Overall Evaluation of the Data
- Potential Usability Issues
- Data Completeness
- Technical Holding Times
- Initial and Continuing Calibrations
- Method and QC Blanks
- Laboratory Control Samples
- Matrix Spikes
- Quantitation and Data Qualifications

EPA Evaluation of Response to EPA Specific Comment 13: *The response appears partially adequate. However, Section 4.7 should also state that the data validation reports will include discussions on surrogates, internal standards, post digest spikes, field duplicates, the extent of outlier exceedances, which results were affected, and how results were qualified. Please submit a written addendum to the Phase I RFI work plan that clearly state this.*

Navy Response: Section 4.7 has been revised to include the following statement:

> The data validation reports will include discussions on surrogates, internal standards, post digest spikes, field duplicates, the extent of outlier exceedances, which results were affected, and how results were qualified.

Specific Comment 20: *Table 3-2, Summary of Sampling and Analytical Program – QA/QC and IDW Samples, Page 1: The analyses listed for IDW samples do not include semivolatile organic compounds (SVOCs) or pesticides. However, the environmental samples for this investigation will be analyzed for these constituents since elevated concentrations have been detected for some compounds on the site. Further, Section 3.8.4 indicates that the soil and water IDW samples will be analyzed for TCLP VOC and TCLP metals. However, this table does not include TCLP analysis for aqueous IDW samples. Revise the Work Plan to clarify why IDW samples will not also be analyzed for SVOCs and pesticides. Further, revise this table to indicate aqueous IDW samples will be analyzed for TCLP metals and TCLP VOCs.*

Navy Response: Table 3-2 will be revised to indicate that the aqueous IDW samples will be analyzed for Appendix IX VOCs, SVOCs, pesticides and metals, and reactivity, corrosivity and ignitablilty. Solid IDW samples will be analyzed for TCLP organics (including VOCs, SVOCs and pesticides), TCLP metals, and reactivity, corrosivity and ignitability. Section 3.8.4 of the text also will be revised accordingly.

EPA Evaluation of the Response to EPA Specific Comment 20: *The response addresses the comment. However, Table 3-2 needs to be revised to indicate that aqueous investigation derived waste (IDW) samples will be analyzed for Appendix IX semivolatile organic compounds (SVOCs) and pesticides, as well as reactivity, corrositvity, and ignitability (RCI). Also, this table needs to be revised to indicate that solid IDW samples will be analyzed for toxicity characteristic leaching procedure (TCLP) organics (including SVOCs, and pesticides) in addition to TCLP metals and volatiles, and RCI. Please submit a written addendum to the Phase I RFI work plan that includes a revised Table 3-2 to provide this information.*

Navy Response: Table 3-2 has been revised as recommended by this comment to include RCI and Appendix IX SVOC and pesticide analyses for IDW water and TCLP SVOCs and pesticides for IDW soil in additional to those analyses already include on this table.

PREQB COMMENTS

EVALUATION OF RESPONSES TO PREQB COMMENTS

PREQB Evaluation of General Comment 2:

PREQB General Comment 2: Please consider the collection of co-located sediment and surface water samples as opposed to the separate samples that are currently proposed. The data derived from co-located samples collected during the same deployment will aid in the understanding of site conditions.

Navy Response: The three proposed sediment sample locations presented on Figure 3-2 were chosen to fill data gaps in the previous 2008 and 2009 sediment sampling events. The proposed surface water sample locations (80SD01 through 80SD06) will be collected in the same locations as the previous sediment samples (56ASD01, 56ASD02, 56ASD05, 56ASD06, 56ASD07, 56ASD10).

Evaluation of Response: Although collecting co-located surface water and sediment samples is the preferred approach, the response is accepted. Please add the clarifying text of the response to the text of the work plan.

Navy Response: Clarification has been added to Section 3.0 of the Work Plan; specifically, the third and fourth bullet in this section have been revised as follows:

- A total of three sediment samples (80SD01 through 80SD03) will be collected; two sediment samples will be collected in the drainage ditch north of Building 207 and one sediment sample downstream, northeast of Rabaul Street. The proposed sediment sample's locations are intended to fill data gaps from previous 2008 and 2009 sediment sampling events.

- A total of six surface water samples (80SW01 through 80SW06) will be collected; three surface water samples will be collected from the drainage ditch north of Building 207, two from a parallel drainage ditch, and one down gradient from the confluence of both drainage ditches, northeast of Rabaul Street. The six surface water samples are located at the same locations as previous sediment samples (56ASD01, 56ASD02, 56ASD05, 56ASD06, 56ASD07, and 56ASD10).

PREQB Evaluation of Page-Specific Comment 2(a):

PREQB Page-Specific Comment 2, Page 2-2, Section 2.2.2:

a. *Please provide information on possible source(s) for the pesticides identified in environmental samples at SWMU 80.*

Navy Response: The purpose of performing the Phase I RFI is to determine presence or absence of contaminants and the need for further characterization of SWMU 80. The current sampling data is not sufficient to determine a possible source for pesticide contamination.

Evaluation of Response: *Please clarify whether a historical records search was conducting prior to scoping for the Phase I RFI. A review of historical records is helpful in determining what chemicals were used, stored or disposed of at a site. If such a review has been conducted, please clarify what information was obtained concerning the use, storage or disposal of pesticides at SWMU 80. If a records search has not been conducted, please ensure that this is done as part of the Phase I RFI.*

Navy Response: Since closure of NAPR, historical records are no longer available for review; however, this will be confirmed as part of the Phase I RFI. Additional clarification has been added to Section 2.2.2 stating:

> In addition, it is recommended that a thorough review of available historical records be performed as part of the Phase 1 RFI to assist determining what chemicals were used, stored and/or disposed of at the site.

Furthermore, the first paragraph of Section 3.0 has been revised to include the following:

> Prior to implementing the sampling program, a thorough review of available historical records will be conducted to assist in determining the materials used, stored or disposed of in the vicinity of Building 207.

PREQB Evaluation of Page-Specific Comment 2(d):

Page 2-2, Section 2.2.2:

d. *The presence of the orange precipitate in the drainage ditch occurs from approximately 30 feet upstream of sediment sample location 56A-SD01 to the culvert immediately downgradient of this sample location. Please depict the location of this culvert on Figure 2-2. In addition, please provide a description of this culvert including possible function of the culvert as it would appear to be located within a forested wetland and not associated with any existing road.*

Navy Response: The estimated location of the culvert has been added to Figure 2-2. During the Phase I RFI the location of the culvert will be survey located.

Evaluation of Response: *The culvert is not depicted on Figure 2-2 as stated in the response. Please include the culvert on Figure 2-2 and discuss this culvert in terms of its function and its potential role as a contributing source of contaminants to the ditch as part of the RFI report.*

Navy Response: Figure 2-2 has been revised to depict the culvert immediately down gradient of sample location 56A-SD01. The culvert is discussed in further detail in Section 2.2.2 stating:

> The culvert down gradient of sample location 56A-SD01 was observed to be remaining from an old roadway which used to pass through the forested area. The road appeared to be abandoned for some time, overgrown and impassable to a vehicle. The culvert itself did not appear to be an environmental concern or as a contributing source of contamination.

PREQB Evaluation of Page-Specific Comment 4(b):

PREQB Page-Specific Comment 4b, Page 3-2, Section 3.1: *Please include details on how soil samples for VOCs will be collected and clarify whether samples will be collected in a coring device (i.e., TerraCores) or whether field preservation will be used.*

Navy Response: Section 3.1 has been revised to indicate that soil sample acquisition procedures for VOC analysis are located in the Final RCRA Facility Investigation Management Plans (Baker 1995)

Evaluation of Response: Typical VOC collection procedures in solid matrices have been updated since 1995 (SW-846 method 5035 was introduced in December 1996 and the newer version of this method, 5035A, was introduced in July 2002). Therefore, please update the VOC collection procedures in solid matrices to meet current collection procedures and document the method that will be used in this work plan.

Navy Response: The third paragraph in Section 3.1 has been revised to include an updated VOC collection procedure, as follows:

> Soil samples that are intended for VOC analysis will be collected from the macro core sampler as soon as possible after the soil has been exposed to the atmosphere to reduce loss of VOCs. Three 5-gram subsamples will be collected per sample location using a Terra Core™ sampler and placed into separate pre-weighed 40-mL VOA vials (one pre-preserved with methanol and the remaining two with deionized water) containing a magnetic stir bar. The sealed vials will be packed in coolers and placed on ice to maintain a temperature of 4° Celsius.

PREQB Evaluation of Page-Specific Comment 6:

PREQB Page Specific Comment 6, Page 3-4, Section 3.3: Please include the time period between well development and groundwater sampling. As per the Ground-Water Sampling Guidelines for Superfund and RCRA Project Managers, Office of Solid Waste and Emergency Response, EPA 542-S-02-001, May 2002, the time for a well to re-stabilize after development is dependent on site-specific geology and should be specified in the site sampling plan.

Navy Response: Based on knowledge of the site geology a minimum of 24 hours is required between well development and sampling. Section 3.3 has been revised to specify no sampling for a minimum of 24 hours after well development.

Evaluation of Response: Please provide additional detail on how it was determined that 24 hours is a suitable waiting period for physical and chemical equilibration of the aquifer in the area of newly installed wells. According to EPA's 1995 USEPA OSWER article EPA/540/S-95/504 by Puls and Barcelona, typically, one to two weeks is required for equilibration. The response indicates that the 24-hour time frame was determined based on site geology. Please provide the methods used or calculations employed in the determination of this brief timeframe.

Navy Response: The purpose of monitoring well development is to ensure removal of fine grained sediments (fines) from the vicinity of the well screen. This allows the water to flow freely from the formation into the well and also reduces the turbidity of the water during sampling. (USEPA ERT SOP 2044; October 23, 2001). Environmental industry standard and Baker's SOP is to conduct well development a minimum of 24 hours after well installation (setting of the cement/bentonite grout). The purpose of this wait time primarily is to ensure that the bentonite well seal is fully hydrated and that the cement-bentonite grout has set sufficiently so that they will not be eroded by the development process. If gentle development methods are used it is even acceptable to develop the well shortly after installation as long as the method does not interfere with the setting of the well seal (USEPA ERT SOP 2044; October 23, 2001).

The timing of groundwater sampling with respect to well installation/development is typically controlled be the fieldwork logistics and the overall project schedule. As a general practice, the groundwater monitoring well installation and development task is usually initiated as one of the first tasks during a field event and sampling of those wells is typically one of the last tasks initiated to maximize the time between development and sampling. For longer field programs, this could mean a week or more between installation/development and sampling. However, for shorter field programs, a minimum time period between installation /development and sampling of 24 hours is usually used as a rule.

More important than the stand-time between well installation/development and groundwater sampling is the equilibration of the groundwater within the well with the surrounding aquifer. This equilibration is evaluated by monitoring the water level in the well (i.e., is the water level static?) and by measuring groundwater quality parameters during purging. Stabilization of the water quality parameters is a strong indicator that the water being purged (and ultimately sampled) is representative of the groundwater quality in the aquifer being sampled. During purging and sampling, pH, specific conductance, temperature, reduction/oxidation (redox) potential, dissolved oxygen (DO), and turbidity are monitored every five minutes. pH is a measure of the free uncomplexed hydrogen ions and reflects stable chemical conditions with a less than 0.1 change in three consecutive readings. Redox potential is a measure of the tendency of the solution to either gain or lose electrons when it is subject to change by introduction of a new species. According to low flow sampling procedures redox must be stable with less than 10 millivolts change in three consecutive readings. DO enters groundwater through diffusion of surrounding air and by aeration caused by rapid movement. DO is stabilized to less than a 10 percent change over three consecutive readings. These indicator parameters at stable conditions also suggest chemical equilibrium of the monitoring well system. If the water quality parameters are stabilized, and other low flow sampling procedures are properly followed then the resulting groundwater sample will be representative of the aquifer groundwater quality.

Reference: USEPA Environemntal Response Team (ERT) Standard Operating Procedures (SOPs), SOP 2044 Monitor Well Development. October 23, 2001 as on the ERT website http://www.ert.org/mainContent.asp?section=Products&subsection=List

PREQB Evaluation of Page-Specific Comment 7(a):

PREQB Page-Specific Comment 7a, Page 3-5, Section 3.4: Please include details on how sediment samples for VOCs will be collected and clarify whether samples will be collected in a coring device (i.e., TerraCores) or whether field preservation will be used.

Navy Response: Section 3.4 has been revised to indicate that sediment sample acquisition procedures are located in the Final RCRA Facility Investigation Management Plans (Baker 1995)

Evaluation of Response: Please refer to PREQB's Evaluation of Response to Comment 4b.

Navy Response: Section 3.4 has been revised to include an updated VOC collection procedure, as follows:

> Sediment samples that are intended for VOC analysis will be collected as soon as possible after the sediment has been exposed to the atmosphere to reduce loss of VOCs. Three 5-gram

subsamples will be collected per sample location using a Terra Core™ sampler and placed into separate pre-weighed 40-mL VOA vials (one pre-preserved with methanol and the remaining two with deionized water) containing a magnetic stir bar. The sealed vials will be packed in coolers and placed on ice to maintain a temperature of 4° Celsius.

PREQB Evaluation of Page-Specific Comment 13:

PREQB Page-Specific Comment 13, Page 4-5, Section 4.6.1.2: Water hardness from a stream present within the general region of the site is proposed to represent water hardness for the surface water samples collected from the drainage ditch. Although acceptable to initially develop surface water screening values, site-specific water hardness should be used in determining the site-specific screening values for metals that are hardness-dependent. It is unclear why water hardness is not analyzed directly from the drainage ditch for each of the proposed surface water samples. This parameter is relatively inexpensive to analyze and is more appropriately collected from the ditch itself rather than rely on a regional value that may not reflect site conditions. Please consider adding water hardness to the list of parameters to be analyzed at each surface water sample location.

Navy Response: The development of screening values for hardness dependent metals using EPA accepted standardized values is preferred to using a small data set from a single round of water hardness data collected at the site. No revisions to the text of the Phase I RFI Work Plan for SWMU 80 are required.

Evaluation of Response: It would be preferable to collect site-specific water hardness data. However, if site-specific water hardness data are not collected during the RFI, PREQB prefers a more conservative approach where the mean (or the 95 percent lower confidence limit of the mean - not the upper confidence limit) is used to calculate water hardness-dependent screening values.

Navy Response: Section 4.6.1.2 has been revised to reflect the 95 percent lower confidence limit of the mean (31.35 mg/L as $CaCO_3$; derived using Scout Version 1.00.1 software [USEPA, 2008]) for USGS water hardness data. As a result, hardness-dependent metals will now have more conservative screening values. Each surface water sample will be analyzed for total calcium and magnesium. Analytical data for these two metals will be used to calculate the hardness concentrations of each sample using the methodology presented in Section 4.6.1.2., upon which time the values in Table 4-2 will be updated to reflect site conditions. Specifically, the water hardness discussion in Section 4.6.1.2 has been revised as follows:

> In these equations, hardness concentrations are expressed in units of mg/L as calcium carbonate ($CaCO_3$). The Water Resources Division of the United States Geological Survey (USGS), in cooperation with local and Federal agencies, obtains data pertaining to the water resources of Puerto Rico each year. Data are available in the National Water Information System water quality database available at http://waterdata.usgs.gov/nwis. A USGS monitoring station (i.e., 50071000) has been identified within a stream located approximately 4 miles northwest of NAPR. From February 21, 1961 to August 10, 2004, a total of 231 hardness measurements were taken at this station. Hardness concentrations ranged from 4 mg/L to 61 mg/L as $CaCO_3$, with an arithmetic mean concentration of 32.2 mg/L as $CaCO_3$, a 95 percent lower confidence limit (LCL) of the mean concentration of 31.35 mg/L as $CaCO_3$ (derived using Scout Version 1.00.1 software [USEPA, 2008]), and a 95 percent upper confidence limit (UCL) of the mean concentration of 32.86 mg/L $CaCO_3$ (derived using USEPA ProUCL Version 4.00.02 software [USEPA, 2007b]). Because NAPR and USGS monitoring station 50071000 are located within the same hydrologic unit (21010005), hardness data for the USGS monitoring station will represent reasonable estimates of surface water hardness within the drainage ditch. Therefore, the

95 percent LCL concentration (i.e., 31.35 mg/L as $CaCO_3$) will be used to derive the surface water screening values for beryllium, cadmium, chromium, copper, lead, nickel, silver, and zinc.

Groundwater and surface water samples will be analyzed for total recoverable calcium and magnesium. These data were used to calculate the hardness concentration of each surface water sample using the following equation from Franson (1985):

$$Hardness\ (mg\ CaCO_3/L) = 2.497[Ca] + 4.118\ [Mg]$$

where:

[Ca]	=	Total recoverable calcium concentration (mg/L)
[Mg]	=	Total recoverable magnesium concentration (mg/L)

In addition to the revisions made to Section 4.6.1.2, Table 4-2 has been updated to reflect these changes.

PREQB Evaluation of Page-Specific Comment 17(a):

PREQB Page-Specific Comment 17, Table 3-3:

a. *To facilitate review and to demonstrate achievement of data quality objectives, please include the project action limits presented in Tables 4-1 through 4-4 on Table 3-3.*

Navy Response: The intent of separate tables (Tables 4-1 through 4-4) to present soil, surface water, sediment and human health screening values was to promote clarity and easy accessibility of the data something that would be sacrificed if action limit values for all media were presented on a single table. Project action limits for all sampling media will not be included on Table 3-3. No revisions to the Tables included in Phase I RFI Work Plan for SWMU 80 are required.

Evaluation of Response: In addition to presenting the PALs on Tables 4-1 through 4-4, please present the lowest PAL on Table 3-3 or prepare a new table that compares the PALs to the reporting limits as a means of demonstrating whether the reporting limits are at or below the PALs. This is an important step in evaluating whether the proposed investigation will meet data quality objectives.

Navy Response: As indicated in the previous response, the intent of presenting separate tables for screening values and quantitation limits is to promote clarity of the data. Similarly, presenting the lowest screening value on Table 3-3 could be misinterpreted by a data user as to the origin or applicability of the value. However, as indicated in our previous response to EPA General Comment 1, to help ensure that screening values are met, required quantitation limits are provided to the laboratory as part of their contractual scope of work. Upon selection of the subcontracted analytical laboratory for this investigation, laboratory specific SOPs and QC limits will be reviewed to confirm they will be able to meet the applicable screening levels. The analytical laboratory's specific SOPs, QC limits, and QLs will be included as an appendix to the Draft Full RFI Report. Additionally, upon further review of Table 3-3, it was discovered that outdated QLs were included in error for SW-846 Method 6020A (ICP/MS) analysis of groundwater. Therefore, Table 3-3 was revised to include the most current QLs available for Method 6020A.

PREQB Evaluation of Response (email from Gloria Toro Agrait on May 11, 2011): *The Navy response indicates that the Navy has not selected the laboratory and will review the selected laboratory's achievable limits to ensure they meet applicable screening levels. This response is not consistent with joint EPA and DoD guidance for UFP-QAPPs, which PREQB has indicated is the preferred work plan*

format. Worksheet 15 of the UFP-QAPP requires the presentation of the project action limits, along with the achievable laboratory limits, defined as "Achievable MDLs and QLs are limits that an individual laboratory can achieve when performing a specific analytical method (taken from the EPA and DoD March 2005 Final Workbook for Uniform Federal Policy for Quality Assurance Plans, EPA: EPA-505-B-04-900C and DoD: DTIC ADA 427486)." PREQB prefers that a table be prepared in all work plans summarizing the information included on Worksheet #15 of the UFP-QAPP to ensure that the data will meet the project action limits and that the data collected during the investigation meets data quality objectives for making site cleanup decisions. However, PREQB will defer to EPA on this issue. Also, please clarify why the revised Table 3-3 is missing quantitation limits for the following metals: barium, beryllium, cadmium, chromium, and cobalt. These metals were included in the original Table 3-3; it is unclear if they have now been removed from the program or were inadvertently left off of the table.

Navy Response: The Navy recognizes that the UFP-QAPP is currently the preferred work plan format. Based on discussions between the Navy, EPA, PREQB and Baker during a conference call held on May 3, 2011, the Navy has agreed to prepare a plan for phasing-in the UFP-QAPP work plan requirements for new projects; existing projects will be completed following the format and requirements of the existing approved Master Project Plans for NAPR. The Navy is currently preparing a letter to the EPA documenting their approach for implementing the UFP-QAPPP requirements.

Table 3-3 was corrected to reflect quantitation limits for barium, beryllium, cadmium, chromium and cobalt as indicated by this comment. Additionally, Table 3-3 was revised to include the lowest screening criteria by media (soil or water) for each parameter.

PREQB Evaluation of Page-Specific Comment 17(d):

Table 3-3:

d. *The QLs listed for metals in aqueous samples appear very high and more appropriate for analysis via 6010C instead of 6020A. Please verify these QLs with the laboratory and/or please consider procuring a laboratory that is capable of reporting lower QLs. Most of the listed QLs appear to be high by about one order of magnitude compared to QLs typically reported by method 6020A. It is important to note that many of the aqueous metals QLs exceed the risk screening levels (ecological groundwater screening levels presented in Table 4-2 as well as the May 2010 EPA Regional Screening Levels [RSLs]) and therefore lower QLs are really needed in order to achieve project objectives. Specific exceedances of risk screening levels are as follows:*

    i. *Antimony QL (20) > EPA Tap water RSL (1.5)*
    ii. *Arsenic QL (10) > EPA Tap water RSL (0.045)*
    iii. *Cadmium QL (5) > EPA Tap Water RSL (1.8)*
    iv. *Chromium QL (10) > EPA Tap Water RSL (0.043)*
    v. *Cobalt QL (10) > EPA Tap Water RSL (1.1)*
    vi. *Vanadium QL (10) > EPA Tap Water RSL (0.26)*
    vii. *Copper QL (20) > ecological groundwater screening levels (3.73)*
    viii. *Nickel QL (4) > ecological groundwater screening levels (8.28)*
    ix. *Silver QL (10) > ecological groundwater screening levels (0.23)*

Navy Response: The Navy conducted a comparison of quantitation limits from different laboratories and found that the quantitation limits for Method 6020A provide lower reporting limits than Method 6010C. The Navy is aware that many of the reporting limits exceed the ecological groundwater screening levels presented in Table 4-2 as well as the May 2010 Regional Screening Levels.

<u>Evaluation of Response:</u> It is PREQB's preference for the quantitation limits to meet the data quality objectives. Please note that for all metals, the QLs provided by the Navy for the 6020 analysis of aqueous samples are much higher than QLs typically observed by PREQB for this method. The table below compares typical QLs to those provided by the Navy as well as the standard EPA CLP methodology for ICP/MS. Please provide additional information as to why your lab cannot achieve typical QLs for this method.

Quantitation Limits for SW-846 Method 6020A (ICP/MS)						
Metals by ICP/MS		***Proposed QLs***	***Lab 1 QLs***	***Lab 2 QLs***	***Lab 3 QLs***	***EPA CLP Method QLs***
(ug/L) 6020A	*Antimony*	*20*	*0.05*	*1.0*	*0.5*	*2*
	Arsenic	*10*	*0.5*	*0.40*	*0.5*	*1*
	Barium	*10*	*0.05*	*50*	*0.5*	*10*
	Beryllium	*4.0*	*0.03*	*0.40*	*0.5*	*1*
	Cadmium	*5.0*	*0.03*	*0.50*	*0.5*	*1*
	Chromium	*10*	*0.2*	*10*	*0.5*	*2*
	Cobalt	*10*	*0.03*	*NA*	*0.5*	*1*
	Copper	*20*	*0.1*	*NA*	*0.5*	*2*
	Lead	*5.0*	*0.03*	*1.0*	*0.5*	*1*
	Nickel	*40*	*0.2*	*5.0*	*0.5*	*1*
	Selenium	*10*	*1.5*	*5.0*	*1*	*5*
	Silver	*10*	*0.03*	*0.50*	*0.5*	*1*
	Thallium	*10*	*0.03*	*0.20*	*0.5*	*1*
	Tin	*10*	*0.1*	*NA*	*NA*	*NA*
	Vanadium	*10*	*0.3*	*5.0*	*0.5*	*5*
	Zinc	*20*	*0.75*	*20*	*5*	*2*

Navy Response: As indicated in our previous response to EPA General Comment 1, to help ensure that screening levels are met, required quantitation limits are provided to the laboratory as part of their contractual scope of work. Upon the selection of the subcontracted analytical laboratory for this investigation, laboratory specific SOPs and QC limits will be reviewed to confirm they will be able to meet the applicable screening levels. The analytical laboratory's specific SOPs, QC limits and quantitation limits will be included as an appendix to the Draft Phase I RFI Report. Additionally, upon further review of Table 3-3, it was discovered that outdated QLs were included in error for SW-846 Method 6020A (ICP/MS) analysis of groundwater. Therefore, Table 3-3 has been revised to include the most current QLs available for Method 6020A.

<u>PREQB Evaluation of Response (email from Gloria Toro Agrait onMay:</u> Please refer to PREQB's Evaluation of Response for PREQB original Page-Specific Comment 17 on Table 3-3 above.

Navy Response: Refer to the response to PREQB Page-Specific Comment 17(a), above.

PREQB Evaluation of Page-Specific Comment 20:

<u>PREQB Page-Specific Comment 20, Figure 3-1:</u> It would be helpful to include information on potential discharge points associated with Building 207, such as doorways, sewer pipes, and floor drains, piping and any outfalls to aid in determining the appropriate location for surface and subsurface soil samples, the purpose of which is to determine if contamination associated with historic activities as Building 207 is

responsible for contamination identified in the drainage ditches.

Navy Response: The purpose of performing the Phase I RFI is to collect current site data used to characterize impacts to the environment and determining the need for further delineation of SWMU 80. Phase I RFI results are used to determine if a Full RFI is required to obtain additional site characterization data and determine possible sources of contamination. The selection of sample locations based on assumptions about Building 207 historic operation and possible discharge points is not a sound scientific method. No revisions to Figure 3-1 of the Phase I RFI Work Plan for SWMU 80 are required.

Evaluation of Response: *In order to ensure that samples are located in areas where contamination is most likely to be present and to aid in determining potential sources for contaminants, an understanding of historic site operations, including the locations of where hazardous chemicals were used, stored or disposed of, is important in scoping a Phase I RFI. Section 1.2 states that Building 207 is part of SWMU 80; therefore, an understanding of what chemicals were used, stored and disposed of and where such activities took place in and around Building 207will aid in determining appropriate placement of samples used to determine presence or absence of contamination at SWMU 80. Please provide the information requested in the original comment.*

Navy Response: The Navy concurs that historical information regarding building use and associated activities is helpful in the development of sampling frequency, location and analysis. However, since the operational closure of NAPR, many historical file are no longer available for review. Only limited information regarding Building 207 was found in the real estate files on-base; this information has already been incorporated into the Work Plan. Refer also to the Navy Response to the PREQB Evaluation of Page-Specific Comment 2(a) which indicates that, as part of the Phase I RFI a thorough review of available historical records will be conducted to assist in determining the materials used, stored or disposed of in the vicinity of Building 207. The results of this review will be presented in the Phase I RFI Report.