



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

NOV 30 2011

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Mark E. Davidson  
US Navy  
BRAC PMO SE  
4130 Faber Place Drive – Suite 202  
North Charleston, SC 29405

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,  
EPA I.D. Number PRD2170027203

SWMU 11 (interior of Old Power Plant/Building 38) – Revised draft Final RFI Report,  
dated May 18, 2004

Dear Mr. Davidson:

This letter is addressed to you as the Navy's designated project coordinator pursuant to the January 29, 2007 RCRA Administrative Order on Consent ("the Consent Order") between the United States Environmental Protection Agency (EPA) and the U.S. Navy (the Navy).

In February 2004, Baker Environmental, on behalf of the Navy, submitted to EPA a draft RCRA Facility Investigation (RFI) report which contained the results of concrete wipe samples (total 45 locations) and concrete chip samples (total 19 locations) from the walls and floor of the interior of Building 38. This sampling was intended to re-characterize the extent of previously documented polychlorinated biphenyl (PCB) contamination inside Building 38 (refer to September 1995 RFI Report). Because a fire had occurred inside Building 38 in 1997, the 2004 re-characterization sampling was necessary to characterize the post-fire conditions. Based on that re-characterization sampling, the February 2004 RFI report made the following recommendation in Section 6.0 (Conclusions and Recommendations): "It is recommended that no further action be performed for this SWMU under the pending closure of the base. It is recommended that any future tenant of this building be informed of the contaminants present within the building so that they may evaluate their options for reuse of the structure."

By letter dated March 26, 2004, EPA advised the Navy that the February 2004 RFI report was not fully acceptable. Our letter further advised that "EPA will...not be able to complete its evaluation of the acceptability of the SWMU 11 RFI final report and its recommendation for no further action until the Navy revises the report to fully specify the expected future land-use and land-use controls (LUCs) to be placed on SWMU 11...."

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

Sincerely yours,



Timothy R. Gordon  
Project Coordinator  
Corrective Action and Special Projects Section  
RCRA Programs Branch

cc: Ms. Wilmarie Rivera, P.R. Environmental Quality Board  
Ms. Gloria Toro, P.R.Environmental Quality Board  
Mr. Jamie Lopez, Acting Executive Director, PR Local Redevelopment Authority  
Mr. Barry Steinberg, Esq., Kutak Rock LLP  
Mr. Mark Kimes, Baker Environmental  
Mr. Stacin Martin, US Navy  
Ms. Cathy Dare, TechLaw Inc.  
Mr. Felix Lopez, USF&WS