

From: Gordon.Timothy@epamail.epa.gov [mailto:Gordon.Timothy@epamail.epa.gov]
Sent: Tuesday, May 25, 2010 10:51 AM
To: mark.e.davidson@navy.mil
Cc: Kimes, Mark; GloriaToro@jca.gobierno.pr; wilmarierivera@jca.gobierno.pr
Subject: Fw: PREQB Technical Evaluation of SWMU 69

Hi Mark,

My letter of May 11, 2010 approved the Disturbed Soil Sampling Plan at SWMU 69 (Aircraft Parking Area), but requested you submit, within 30 days of receipt of my May 11 letter, a schedule for implementing. Since then I have received comments from PREQB on the Sampling Plan (attached below).

Please address those PREQB comments when you submit the schedule requested by my May 11 letter. Please confirm that time-frame is acceptable, or if not, please propose an alternative date to respond to PREQB's SWMU 69 Comments.

Thanks.

Timothy R. Gordon
U.S. Environmental Protection Agency
RCRA Programs Branch
Resource Conservation and Special Projects Section 290 Broadway, 22nd. Floor New York, NY 10007-1866 Phone (212) 637-4167

----- Forwarded by Timothy Gordon/R2/USEPA/US on 05/25/2010 10:41 AM

From: "Rivera Otero, Wilmarie" <WilmarieRivera@jca.gobierno.pr>
To: Timothy Gordon/R2/USEPA/US@EPA
Cc: "Toro Agrait, Gloria" <GloriaToro@jca.gobierno.pr>
Date: 05/21/2010 09:24 AM
Subject: PREQB Technical Evaluation SWMU 77 and SWMU 66

Good Morning, Tim:

Attached please find PREQB technical Evaluations for the Draft Soil Sampling Strategy for Disturbed Soil, SWMU 69 and the RTCs Final Phase I RFI Sampling and Analysis Plan, SWMU 77, Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico. Hard copy will follow.

If you have any questions or comments, please give me a call.

Have a nice day!

Wilmarie Rivera
Federal Facilities Coordinator
Puerto Rico Environmental Quality Board
Tel. (787) 767-8181 x. 6129
Cel. (787) 365-8573(See attached file: PREQB Tech Evaluation of Soil Sampling Strategy SWMU 69 TRC.pdf)(See attached file: PREQB Technical Evaluation of the RTCs Draft SAP SWMU77.pdf)



COMMONWEALTH OF PUERTO RICO
OFFICE OF THE GOVERNOR
ENVIRONMENTAL QUALITY BOARD

ENVIRONMENTAL EMERGENCIES RESPONSE AREA

May 17, 2010

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

**Re: Technical Evaluation of the Draft Soil Sampling Strategy for Disturbed Soil,
SWMU 69 – Aircraft Parking Area, Naval Activity Puerto Rico (NAPR), Ceiba,
Puerto Rico, EPA ID No. PR2170027203**

Dear Mr. Gordon:

The Hazardous Wastes Permits Division (HWPD) and the Federal Facility Coordinator has finished the review of the above-mentioned document.

Enclosed please find PREQB's technical review. If you have any additional comment or question please feel free to contact Gloria M. Toro Agrait at (787) 767-8181 extension 3586 or myself at extension 6141.

Cordially,


Wilmarie Rivera

Federal Facilities Coordinator
Environmental Emergencies Response Area

cc: Gloria M. Toro Agrait, Environmental Permits Officer

**PREQB's Technical Evaluation of the Draft Soil Sampling Strategy for
Disturbed Soil, SWMU 69 – Aircraft Parking Area
Naval Activity Puerto Rico, Ceiba, PR2170027203**

I. GENERAL COMMENTS

1. Based on observations made by Baker personnel, the limit of soil disturbance at SWMU 69 is two feet in depth. Therefore, please collect the subsurface soil samples in one-foot increments (1- to 2-feet and 2- to 3-feet below grade) as opposed to collecting one two-foot increment. This would minimize the potential of dilution of the 1- to 2-foot interval soils with the presumably cleaner 2- to 3-foot interval soils. Further, as a cost-saving measure, the laboratory can analyze the 1- to 2-foot interval as soon as the samples are submitted and archive the deeper interval for potential analysis at a later date pending the results of the first analyses and evaluation of the data relative to the CAOs. If the results of an upper interval sample analysis exceed the CAOs, the laboratory could then analyze the sample from the lower interval. This approach would allow for better vertical definition and it may also prove to be cost-effective during the implementation of the corrective measures, i.e., soils may only have to be excavated to depths of 2 feet as opposed to 3 feet.

II. PAGE-SPECIFIC COMMENTS

1. Table 1:
 - a. Please correct the sample identification number for the 1-3 foot sample collected at 69SB118-01. It is currently listed as 69SB108-01.
 - b. Please collect a matrix spike/matrix spike duplicate sample from one of the soil pile samples in order to properly assess the matrix effects on this particular matrix. Please revise the table accordingly.

2. Table 2:
 - a. Some of the listed quantitation limits (QL) exceed soil screening levels. Please evaluate the use of ICP/MS (SW-846 method 6020A) in order to achieve these screening levels.
 - i. The QL of arsenic (1.0 mg/kg) exceeds the EPA Regional Screening level for residential soil (0.39 mg/kg).
 - ii. The QL of chromium (1.0 mg/kg) exceeds the EPA Regional Screening level for hexavalent chromium in residential soil (0.29 mg/kg).
 - iii. The QL of tin (5.0 mg/kg) exceeds the NAPR basewide background value (3.76 mg/kg).

- b. Please clarify to what criteria the sediment sample results will be compared.
- c. Please provide a revised Table 2 showing the criteria being used for soil and sediment samples in addition to the QLs.
- d. Please confirm that the QLs will be used in the evaluation of nondetect results and not the method detection limits, as this has been an issue in previous reports submitted for this SWMU.

2. Table 3:

- a. The document stated that the field activities including the quality assurance/quality control procedures will follow the EPA-approved Final CMS Work Plan for SWMU 69 submitted on December 6, 2007. Please revise Table 3 in order to be in accordance with Section 3.5 of CMS Work Plan. Specifically to proposed to use trip blanks at a frequency of one per shipped cooler.