



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUL 23 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Criswell
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,

- 1) Final Landfill Gas Monitoring Work Plan – SWMU 3 (dated May 20, 2008).
- 2) Responses to Comments on Final Monitored Natural attenuation Work Plan for AOC F
- 3) Full RFI Reports for SWMUs 27, 28, and 29 (dated June 24, 2008)

Dear Mr. Criswell:

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). EPA Region 2 has completed its reviews of the above documents, which were submitted by Baker Environmental on behalf of the Navy, pursuant to the requirements of the Consent Order. Based upon our reviews, EPA has several comments, which are discussed below.

I. Final Landfill Gas Monitoring Work Plan – SWMU 3

EPA requested that our consultant, TechLaw Inc., review the May 20, 2008 Revised final Work Plan. Based on that review, EPA has determined that the May 20, 2008 work plan is acceptable, subject to the Navy addressing two comments. These comments are:

1. **Response to Specific Comment 1: Section 2.0, Monitoring Activities, Pages 2-1 through 2-4.** The comment requested that procedures described in 40 CFR Part 258.23(c), which presents procedures that must be followed if methane gas levels in the regulation are exceeded, be included in Section 2. The response includes a revision to the text which includes a reference to this section of the CFR, however, the procedures have

not been outlined. For a complete Work Plan, this section should be revised to provide more specific details regarding the procedures that must be followed, and not just a reference to 40 CFR Part 258.23(c).

2. **Response to Specific Comment 2: Section 2.4.3, Calibration of Field Instruments, Page 2-3.** The response states that equipment will be calibrated at the office prior to use. It is unclear based on this response if this refers to the contractor's office on the site or another mainland office. If calibration will not be performed onsite prior to LFG monitoring, this response is inadequate. In order to ensure accurate readings on equipment such as a photoionization detector, calibration must be performed daily, after the equipment has been shipped.

The Navy does not need to submit a revised work plan; rather please submit, within thirty days of your receipt of this letter, an addendum to the work plan addressing the above two comments.

II. Responses to Comments on Final Monitored Natural Attenuation Work Plan for AOC F

EPA requested that our consultant, TechLaw Inc., review the Responses to Comments submitted by Baker Environmental's letter of May 20, 2008, which addressed comments given with EPA's April 10, 2008 letter. EPA has determined that the May 20, 2008 Responses are acceptable.

As previously discussed in EPA's April 10, 2008 letter, the Navy shall submit a revised MNA Work Plan, addressing EPA's December 11, 2007 and April 10, 2008 comments, following completion of the initial round (first quarter) of Quarterly sampling required under the October 10, 2007 MNA Work Plan. Please submit that revised MNA Work Plan no later than 45 days following receipt of all validated analytical data from the initial round of Quarterly sampling, which is the timeframe allowed for submission of the first MNA sampling report, as described in Section 11.0 (Reporting) of the October 10, 2007 MNA Work Plan.

III. Full RFI Reports for SWMUs 27, 28, and 29

EPA has completed its review of the Full RFI Reports for the sludge drying beds at the facility's three wastewater treatment plants, which were submitted by Baker Environmental's letter of June 24, 2008. As part of that review, EPA also requested that our consultant, TechLaw Inc, review the reports. Based on those reviews, EPA has determined that the Full RFI Reports for SWMUs 27, 28, and 29 are acceptable, except as noted in the attached technical reviews. Rather than resubmitting the Full RFI reports, please submit an addendum to each report addressing the enclosed comments. Please submit those addendums to the Full RFI reports within thirty days of your receipt of this letter.

Since the RFI Reports indicate that the recently issued (June 2008) EPA Regional Screening Levels are not reflected in the Full RFI reports, those 2008 Regional Screening levels should be reflected in the Corrective Measure Studies (CMS) that are proposed for each SWMU (refer to the Recommendations Section of each RFI Report). If based on evaluations using those 2008 Regional Screening Levels, additional sampling appears warranted to further delineate contamination and/or quantify risk, the proposals for such additional sampling should be included with the draft CMS work plans for those SWMUs, when submitted. Pursuant to Paragraph 23.F of the Consent Order, the draft CMS Work Plans shall be submitted within 60 days of your receipt of this letter.

If you have any questions on the above or enclosed comments, please telephone me at (212) 637-4167.

Sincerely yours,



Timothy R. Gordon
Remedial Project Manager
Resource Conservation & Special Projects Section
RCRA Programs Branch

Enclosures (3)

cc: Ms. Wilmarie Rivera, P.R. Environmental Quality Board, w/encls.
Mr. Julio I. Rodriguez Colon, P.R. Environmental Quality Board, w/encls.
~~Mr. Mark Kimes, Baker Environmental, w/encls.~~
Mr. Andrew Dorn, TechLaw Inc, w/o encls.

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID NO. PR2170027203**

**TECHNICAL REVIEW OF THE DRAFT FULL RCRA FACILITY INVESTIGATION
REPORT FOR SWMU 27- CAPEHEART WASTEWATER TREATMENT
PLANT SLUDGE DRYING BEDS**

**TECHNICAL REVIEW OF THE DRAFT FULL RCRA FACILITY INVESTIGATION
REPORT FOR SWMU 28- BUNDY WASTEWATER TREATMENT
PLANT SLUDGE DRYING BEDS**

**TECHNICAL REVIEW OF THE DRAFT FULL RCRA FACILITY INVESTIGATION
REPORT FOR SWMU 29- INDUSTRIAL AREA WASTEWATER
TREATMENT PLANT SLUDGE DRYING BEDS**

DATED JUNE 24, 2008

Submitted to:

**U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866**

Submitted by:

**TechLaw, Inc.
One Penn Plaza, Suite 2509
New York, NY 10119**

**Task Order No.
Contract No.
U.S. EPA TOPO
Telephone No.
TechLaw TOM
Telephone No.**

**002
EP-W-07-018
Timothy Gordon
212-637-4167
Andrew Dorn
312-345-8963**

July 21, 2008

NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID NO. PR2170027203

TECHNICAL REVIEW OF THE DRAFT FULL RCRA FACILITY INVESTIGATION
REPORT FOR SWMU 27- CAPEHEART WASTEWATER TREATMENT
PLANT SLUDGE DRYING BEDS

DATED JUNE 24, 2008

GENERAL COMMENT

1. For some of the analytes (e.g., arsenic) the Contract Required Quantitation Limit (CRQL) is higher than the screening values for USEPA Region IX Residential Soil PRGs and/or the Selected Ecological Surface Soil Screening Values. It is unclear if and how results that fall below the CRQL, but are above the screening levels are qualified. Please include a discussion on the qualification of these results.

SPECIFIC COMMENTS

1. **Section 4.4.1 Surface and Subsurface Soils:** A surface soil sample was collected at 27SB08, which was not included in Table 3.1 of the Full RCRA Facility Investigation [RFI] Work Plan, SWMUs 27, 28, and 29 (Work Plan). Based on Section 3.1.1 and Figure 3-1 of the Work Plan, a concrete pad exists at this location of 27SB08. Please revise the Draft Full RFI Report, SWMU 27 Capeheart Wastewater Treatment Plant Sludge Drying Beds to provide the rationale for the collection of the surface soil Sample at 27B08.
2. **Table 5-1:** In sample 27SS02 zinc is listed as exceeding the ecological screening value and NAPR basewide background value in Figure 5-2. However, in Table 5-1 the concentration of zinc is not highlighted (as exceeding the ecological screening value) even though the value is equivalent to the value listed in the table. For consistency, please revise the formatting of Table 5-1 so that the information matches that in Figure 5-2.

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**TECHNICAL REVIEW OF THE DRAFT FULL RCRA FACILITY INVESTIGATION
REPORTS FOR SWMU 28- BUNDY WASTEWATER TREATMENT
PLANT SLUDGE DRYING BEDS**

DATED JUNE 24, 2008

GENERAL COMMENT

1. For some of the analytes (e.g., arsenic) the Contract Required Quantitation Limit (CRQL) is higher than the screening values for USEPA Region IX Residential Soil PRGs and/or the Selected Ecological Surface Soil Screening Values. It is unclear if and how results that fall below the CRQL, but are above the screening levels are qualified. Please include a discussion on the qualification of these results.

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TECHNICAL REVIEW OF THE DRAFT FULL RCRA FACILITY INVESTIGATION
REPORT FOR SWMU 29- INDUSTRIAL AREA WASTEWATER
TREATMENT PLANT SLUDGE DRYING BEDS

DATED JUNE 24, 2008

GENERAL COMMENT

1. For some of the analytes (e.g., arsenic) the Contract Required Quantitation Limit (CRQL) is higher than the screening values for USEPA Region IX Residential Soil PRGs and/or the Selected Ecological Surface Soil Screening Values. It is unclear if and how results that fall below the CRQL, but are above the screening levels are qualified. Please include a discussion on the qualification of these results.

SPECIFIC COMMENTS:

1. **Section 4.2.1 Surface and Subsurface Soils:** For soil borings 29SB13 and 29SB14, only four subsurface soil samples were collected even though no groundwater was encountered. However, Section 3.1.3 of the Full RCRA Facility Investigation [RFI] Work Plan, SWMUs 27, 28, and 29 (Work Plan) proposes the collection of five subsurface soil samples at each soil boring location. Please revise the Draft Full RFI Report, SWMU 29 Industrial Area Wastewater Treatment Plant Sludge Drying Beds report to explain this deviation from the Work Plan.
2. **Section 5.3 Subsurface Soils and Section 6.1 Conclusions:** Both sections state that "Arsenic exceeded the PRGs at six out of the seven subsurface locations." However, there were subsurface soils collected at eight locations. Table 5-2 indicates that results for arsenic exceeded the Project Remediation Goals (PRGs) at seven of the eight locations. Please revise the text so that it is consistent with the information presented in Table 5-2.
3. **Figure 5-1:** Figure 5-1, Exceedances of Human Health Screening Criteria and Background for Surface Soil includes sample 29SB13-00. However, while arsenic and vanadium exceed the human health PRG in 29SB13-00, the concentrations of these metals do not exceed the background level. To be consistent with the information presented for the other samples, please revise Figure 5-1 to only include results exceeding both human health screening levels and the background concentration. Alternatively, explain in the text why 29SB13-00 is included in the figure.