



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

AUG 21 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

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

- 1) Notice of Newly Discovered Release, dated June 29, 2007;
- 2) SWMU 9, Area B, Tank 214 - Draft Phase I RFI Report, dated Aug 14, 2007

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). EPA Region 2 has received the above items and has the following comments:

Newly Discovered Release

Based on the newly discovered release at the transformer storage pad in the pole yard off of Hallandia Street, as reported in the June 29, 2007 letter from Mr. Jeffrey G. Meyers of the Navy, and verbal allegations made by a past base employee at the August 7, 2007 Restoration Advisory Board (RAB) meeting in Ceiba, PR, that there were past spillages at the pole yard, EPA has determined that the transformer storage pad in the pole yard off of Hallandia Street, and the area surrounding that storage pad likely impacted by alleged past releases from it, are to be designated as SWMU # 78. This designation is made pursuant to Section VIII, Paragraph 26 of the Consent Order.

Also, pursuant to Section VIII, Paragraph 26 of the Consent Order, within 90 days of your receipt of this letter, please submit a draft Phase I RFI Work Plan to determine whether or not releases of solid and/or hazardous wastes or hazardous constituents are confirmed to be present both immediately adjacent to the transformer storage pad and throughout the area surrounding the storage pad that might have been impacted by alleged past releases from it.

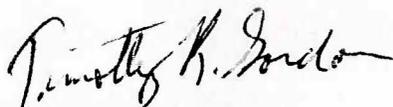
SWMU 9, Area B, Tank 214

The Draft Phase I RFI Report, dated August 14, 2007, which was submitted on behalf of the Navy by Mr. Mark Kimes of Baker Environmental, indicates that elevated concentrations of total petroleum hydrocarbons (TPH), including both "diesel range organics" (DRO) and "gasoline range organics" (GRO) were detected in surface soils and sediments near the shore-line north of Tank 214, and that benzene and several other organic constituents, including the chlorinated solvent 1,1,2-trichloroethane (TCA), were detected in the groundwater adjacent to tank 214 at concentrations exceeding human health screening criteria. EPA has determined that the Phase I RFI Report, dated August 14, 2007, is complete.

Since the results of the Phase I RFI have confirmed that releases of solid and/or hazardous wastes or hazardous constituents are present, please submit, within 90 days of your receipt of this letter, a work plan to implement a full RFI for the soils, sediments, and groundwater impacted by the releases at the Tank 214 area. The full RFI work plan shall be designed to fully characterize the nature and extent of contamination associated with: a) the TPH present in the soils surrounding Tank 214; b) the TPH present in the sediments near the shore-line north of Tank 214; and c) benzene and other organic constituents, including TCA, present in the groundwater around Tank 214. The work plan shall conform with the "Scope of Work for a Full RFI", given in Attachment III of the January 2007 Consent Order.

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

Sincerely yours,



Timothy R. Gordon
Project Coordinator
Caribbean Section
RCRA Programs Branch

cc: Ms. Josefina Gonzales, Office of the President, P.R. Environmental Quality Board
Mr. Julio I. Rodriguez Colon, Manager, Land Pollution Control Area, P.R. Environmental Quality Board.
Mr. Pedro Ruiz, Naval Activity Puerto Rico.
Mr. Dave Criswell, US Navy, BRAC PMO
Mr. Mark Kimes, Baker Environmental
Mr. Andrew Dorn, TechLaw Inc.
Mr. Felix Lopez, USF&WS