



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

APR 10 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) February 29, 2008 Responses to Comments on CMS Work Plans for SWMUs 56, 59, 61, 69, and 74
- 2) February 29, 2008 Responses to Comments on SWMU 9 Area B, Tank 214 Draft Full RFI Work Plan;
- 3) February 15, 2008 Responses to Comments on SWMU 14 Screening-Level Ecological Risk Assessment (SERA) Plan;
- 4) February 15, 2008 Draft Landfill Gas Monitoring Plan for SWMU 3; and
- 5) February 15, 2008 Responses to EPA's December 11, 2007 Comments on the October 10, 2007 Final Monitored Natural Attenuation Work Plan for AOC F (Rev 01).

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.

1. CMS Work Plans for SWMUs 56, 59, 61, 69 and 74

The Navy did not include an updated Quality Assurance Project Plan (QAPP) with the December 6, 2007 Corrective Measures Study (CMS) Work Plans for SWMUs 56, 59, 61, 69 and 74, but rather cited the procedures in the September 1995 RFI "Master Management Work Plan". Since

the 1995 RFI Master Plan was prepared prior to the Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP), dated March 2005, EPA in our comments dated January 25, 2008 requested that the Navy discuss where the information required under the UFP-QAPP is presented in the 1995 Master Management Plan.

Our review of the Navy's February 29, 2008 Responses to EPA's December 6, 2007 Comments has determined that, as requested in the January 25 comments, the Navy has done an acceptable job of showing, section by section, where the information required under the UFP-QAPP is presented in the 1995 Master Management Plan. Since the DCQAP was previously reviewed and approved by EPA as part of the 1995 Master RFI Work Plan, no further comments are made on the DCQAP at this time. Therefore, EPA approves the December 6, 2007 CMS Work Plans for SWMUs 56, 59, 61, 69 and 74.

II. SWMU 9 Area B, Tank 214 Draft Full RFI Work Plan

EPA has completed its review of the February 29, 2008 Responses to Comments and the Revised Full RFI Work Plan for SWMU 9 Area B, Tank 214, and determined that they acceptably address EPA's January 17, 2008 Comments. Therefore, the February 29, 2008 Full RFI Work Plan is approved.

III. SWMU 14 Responses Regarding Screening-Level Ecological Risk Assessment(SERA)Plan

EPA has completed its review of the February 15, 2008 Responses to EPA's December 11, 2007 Comments regarding the November 9, 2007 Additional Data Collection Work Plan (the Work Plan) in support of the Screening-Level Ecological Risk Assessment (SERA) for SWMU 14. EPA's comments regarded procedures to be followed for implementing the SERA upon completion of the Additional Data Collection Work Plan. The February 15, 2008 Responses acceptably address EPA's comments on implementing the SERA. As indicated in our letter of December 11, 2007, the November 9, 2007 Additional Data Collection Work Plan itself was previously approved.

IV. Draft Landfill Gas Monitoring Work Plan - SWMU 3 (Base Landfill)

Based on the technical review by our consultant, TechLaw Inc., EPA has the following comments on the February 15, 2008 Draft Landfill Gas Monitoring Plan:

GENERAL COMMENTS

The Work Plan indicates that landfill gas monitoring will only be conducted in Area 4 of the landfill. However, the rationale for not performing gas monitoring in other areas of the landfill is not sufficiently supported in the Work Plan. The rationale for only monitoring Area 4 is presented in Section 1.3.1 of the Work Plan, and appears to be based on the greater age of the fill in Areas 1 and 2 and the intermediate/vegetative covers in these areas. With respect to Area 3, which is reportedly a more recently filled area, it can be surmised from Section 2.1 that only Area

4 (and not the recently filled Area 3) is being monitored since Area 4 “was the last cell filled,” and because it is the only cell with venting. An excerpt from the EPA guidance document titled Guidance for Evaluating Landfill Gas Emissions from Closed or Abandoned Facilities, EPA/600/R-05/123a (EPA Guidance) is included in Section 1.3.1, and seems to be included to support the Navy’s contention that Areas 1, 2 and 3 do not require monitoring due to their age and years of inactivity. However, that same guidance document states (Section 1) that: “Usually, gas production begins within a year of waste placement and may continue for as long as 50 years after landfill closure.” Importantly, the onset of gas production and the duration of gas production are dependent on the type of waste and moisture content of the waste. The Work Plan needs to be revised to provide a more detailed discussion of the rationale for not conducting landfill gas monitoring in Areas 1, 2 and 3 of the landfill.

SPECIFIC COMMENTS

1. **Section 2.0, Monitoring Activities, Pages 2-1 through 2-4.** 40 CFR Part 258.23(c) describes procedures that must be followed if methane gas levels in the regulation are exceeded. However, these procedures are not included in the Work Plan. Revise the Work Plan to include the 40 CFR Part 258.23(c) procedures.

Section 2.4.3, Calibration of Field Instruments, Page 2-3. This section states that contractor-owned gas monitoring equipment is calibrated in the office prior to shipment of the equipment, and if the equipment is rented, it is assumed the rental company will have calibrated the instruments prior to shipment. However, a photoionization detector (PID) has been proposed for the screening of gross concentrations of VOCs. The type of calibration gas used and proper calibration in the field will be critical to the detection of the targeted VOCs potentially present at the landfill. At a minimum, field instruments should be calibrated daily before use, and the calibration should be confirmed at the end of the day to verify that the data accurately represent field conditions. Revise the Work Plan to include daily calibration procedures for the field instruments.

Section 2.5, Quality Assurance/Quality Control, Page 2-4. The Work Plan indicates that if VOCs are detected by the PID at concentrations greater than 10 parts per million (ppm), then a sample will be collected in a summa canister and sent to a laboratory for VOC analysis. However, the Work Plan does not indicate the analytical procedures and methods to be used and the parameters that will be analyzed. In addition, there are no quality assurance/quality control (QA/QC) procedures included in the plan for laboratory analysis. Revise the Work Plan to identify the analytical methods that will be used to test the gases in the summa canisters, and include a statement in the Work Plan that QA/QC procedures for the laboratory analyses will be submitted to EPA for approval upon shipment of the summa canister to the laboratory.

Within 35 days of your receipt of this letter, please submit a revised Landfill Gas Monitoring Plan and/or written responses to address the above comments.

V. RESPONSES TO COMMENTS ON THE FINAL MONITORED NATURAL ATTENUATION WORK PLAN FOR AOC F

Based on EPA and our consultant's (TechLaw's) evaluation of the Navy's February 15, 2008 Responses to EPA's December 11, 2007 Comments on the October 10, 2007 Final Monitored Natural Attenuation Work Plan for AOC F (Rev 01), EPA has the following comments.

Response to General Comment 2: The Navy's response to TechLaw General Comment 2 requires several clarifications, as discussed below:

- The Navy's response to the first bullet states that isopleth maps may be provided. It is suggested that at a minimum, contaminant of concern (COC) isopleths, from the most recent sampling event, be included in the 5-year review. In each subsequent 5 year review, the isopleths maps from the most recent sampling event should be presented for comparison to the previous 5-year isopleths maps. This will provide an easy means to understand graphical representation of the progress of the remedy.
- The Navy's response to the fourth bullet states that MTBE will be monitored for the first year. This means that for the sites with annual monitoring, MTBE may only be sampled once. This approach may be acceptable where records indicate that no MTBE or MTBE containing fuels were ever handled; however for sites where MTBE or MTBE fuels were managed, those sites should be sampled at least twice to minimize false positives/negative results.

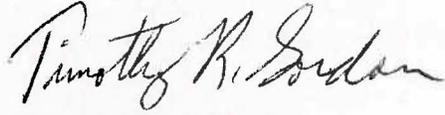
In addition, while no seasonal effects are anticipated at this site, the sites on a quarterly sampling schedule should be evaluated for seasonal variation to ensure this assumption.

Only those responses that do not appear adequate or which require further clarification are discussed above; the other February 15, 2008 Responses are acceptable.

Pursuant to the request in Baker Environmental's February 15, 2008 letter to submit revisions to the MNA work plan following completion of the first-round of sampling, the Navy may address the above comments and submit the revised MNA Work Plan, which shall address EPA's December 11, 2007 comments, and the above comments, following completion of the initial round (first quarter) of Quarterly sampling required under the October 10, 2007 MNA Work Plan. Please submit the revised MNA Work Plan no later than 45 days following receipt of all validated analytical data from the initial round of Quarterly sampling. That is the timeframe allowed for submission of the first report, as described in Section 11.0 (Reporting) of the MNA Work Plan.

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 and Special Projects Section
RCRA Programs Branch

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