



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

AUG 11 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. July 1, 2008 Responses to EPA Comments dated May 13, 2008 on Navy's April 17, 2008 Revised Groundwater Sampling and Analysis Plan for Base Landfill (SWMU #3J);
2. July 8, 2008 Semi-annual Groundwater Monitoring Report for SWMU #3 former Solid Waste Landfill;
3. July 11, 2008 Revised Final Phase I RCRA Facility Investigation Report for SWMU 68 (former southern fire training area).

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. Navy Responses to EPA Comments on Navy's April 17, 2008 Revised Groundwater Sampling and Analysis Plan for Base Landfill (SWMU #3)

EPA has completed our review of the Responses to EPA Comments dated May 13, 2008 on Navy's April 17, 2008 Revised Groundwater Sampling and Analysis Plan (SAP) for the Base Landfill, i.e., SWMU #3. Those Responses were submitted on behalf of the Navy by Baker Environmental's letter of July 1, 2008. As part of our review, EPA requested our consultant,

TechLaw Inc., to review the July 1, 2008 Responses. Based on those reviews, EPA has determined that the Responses are acceptable. Those Responses included a revised Table 4-16 (dated July 1, 2008), to replace the version of Table 4-16 included in the April 2008 SAP. Therefore, EPA will approve the April 17, 2008 SAP, as modified to include the revised Table 4-16 (dated July 1, 2008).

## II. Semi-annual Groundwater Monitoring Report for SWMU #3 former Solid Waste Landfill

EPA has completed our review of the July 8, 2008 Semi-annual Groundwater Monitoring report on the March 2008 Sampling Event (the Report). As part of that review, EPA requested our consultant, TechLaw Inc., to also review the Report. Based on those reviews, EPA has several comments on the Report, which are discussed in the enclosed technical review.

While EPA will not require submission of a revised groundwater report at this time, please submit, within 35 days of your receipt of this letter, written responses to address comments in the enclosed Technical Review.

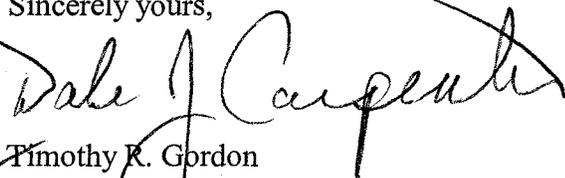
## III. Revised Final Phase I RCRA Facility Investigation Report for SWMU 68

EPA has completed its review the July 11, 2008, Revised Final Phase I RCRA Facility Investigation Report for SWMU 68 (the Report). This review included the associated Responses, submitted on behalf of the Navy by Baker Environmental's July 11, 2008 letter, addressing EPA's May 13, 2008 Comments. Based on our review, the Responses and the revised Final Phase I RFI Report are acceptable.

Based on the Conclusions and Recommendations given in Section 6.0 of the Report, EPA has determined that a "Streamlined CMS" is required to define the proposed remedy for the elevated lead concentrations measured in the surface soils at SWMU 68. Within 60 days of your receipt of this letter, please submit a draft work plan for such a "Streamlined CMS", as described in Section 23.F(b) of the Consent Order.

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

Sincerely yours,



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

Enclosure (1)

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

**TECHNICAL REVIEW OF THE JULY 8, 2008, SEMI-ANNUAL  
GROUNDWATER MONITORING REPORT ON THE MARCH 2008  
SAMPLING EVENT FOR SWMU 3, BASE LANDFILL  
NAVAL ACTIVITY PUERTO RICO**

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

**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**

<b>EPA Task Order No.</b>	<b>002</b>
<b>Contract No.</b>	<b>EP-W-07-018</b>
<b>TechLaw TOM</b>	<b>Andrew Dorn</b>
<b>Telephone No.</b>	<b>312-345-8963</b>
<b>EPA TOPO</b>	<b>Timothy Gordon</b>
<b>Telephone No.</b>	<b>212-637-4167</b>

**July 25, 2008**

**TECHNICAL REVIEW OF THE JULY 8, 2008, SEMI-ANNUAL  
GROUNDWATER MONITORING REPORT ON THE MARCH 2008  
SAMPLING EVENT FOR SWMU 3, BASE LANDFILL  
NAVAL ACTIVITY PUERTO RICO**

The following comments were generated based on the technical review of the July 8, 2008, Semi-Annual Groundwater Monitoring Report on the March 2008 Sampling Event for SWMU 3, Base Landfill (Report).

**GENERAL COMMENTS**

1. Section 3.3, Data Quality Control and Validation, states that several qualifications were necessary due to contamination in continuing blanks and associated QA/QC samples, in particular, the equipment rinsate. However, no additional information about these data quality issues has been included. Revise this section to discuss the specific instances where qualification was required and the reasons for this requirement. In addition, discuss the effect on the overall data quality for this sampling event.
2. It appears, based on Table 3-3, Criteria Comparison Table, that barium was detected in several locations above the Intrawell comparison levels. For example, in R7GW04R, barium exhibited a concentration of 0.15 mg/l, which exceeded the Upgradient Background Average/Max. In addition, barium at R7GW08R (0.066J mg/l) exceeded the Background Intrawell level (0.035 mg/l). These exceedances have not been discussed in Section 3.4.2. Section 3.4.2 should be revised to discuss any exceedance of any criteria. Further, based on the response to TechLaw General Comment 1 on the Revised Groundwater Sampling and Analysis Plan (Baker, July 1, 2008), it appears that any exceedance of any standard was to be discussed, and the Navy would explain why this exceedance is not indicative of a release.

**SPECIFIC COMMENTS**

1. **Section 3.4.1, Volatile Organic Compounds, Page 3-3:** This section states that Volatile Organic Compounds (VOCs) were detected above background levels. However, Section 3.4.1 does not state whether these compounds were detected above regulatory levels. Revise this section to discuss whether the detected compounds were above regulatory levels. In addition, revise Sections 3.4.1 and 3.4.2 to discuss any compounds that exhibited detection limits above any of the comparison criteria (e.g., acetone in R7GW02R was reported as 25U, which exceeded both the Overall Background Upper Limit of the Means and also the Upgradient Background Average; antimony in R7GW04R was reported as 0.005 UJ mg/l, which exceeds the Overall Background Upper Limit of the Means (0.002 mg/l)).

2. **Table 2-3, Groundwater Elevation Summary:** Each well shown in Table 2-3 occupies two rows; each row has a different groundwater elevation. It is unclear why two groundwater elevations have been presented for each well in Table 2-3. Revise the table to provide an explanation for the two rows under each monitoring well.
3. **Table 3-3, Criteria Comparison Table, Page 4 of 9:** The result for barium is qualified as R, but R is not defined in the table notes. Add a description of the R qualification to the table.