



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN 22 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark E. Davidson
U.S. Navy
BRAC PMO SE
P.O. Box 190010
North Charleston, SC 29419-9010

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

Final additional Data Collection Report and Screening Level Ecological Risk Assessment
and Step 3a of Baseline Ecological Risk Assessment at SWMUs 1 and 2, dated May 18,
2006;

Draft Steps 3b and 4 of Baseline Ecological Risk Assessment at SWMU 45, dated April
20, 2006

Dear Mr. Davidson:

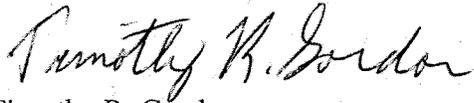
The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the above two documents submitted by Baker Environmental on behalf of the Navy. Based upon our review and by our contractor, Booz Allen, EPA has determined that the Final additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment at SWMUs 1 and 2 is acceptable. However, EPA has identified two items of concern with the proposed analytes and with the decision criteria proposed in the Draft Steps 3b and 4 of Baseline Ecological Risk Assessment (BERA) at SWMU 45. These are discussed in the enclosed Technical Review.

In addition to the comments given in the enclosed Technical Review, EPA requests that when implementing the BERA at SWMUs 1 and 2, and Steps 3b and 4, and subsequent steps of the BERA at SWMU 45, the BERA evaluations of inorganic constituent releases at those SWMUs should be made based upon comparisons with the results of the revised Summary Report for Environmental Background Concentrations of Inorganic Constituents, which is to be developed pursuant to EPA's letter of May 22, 2006 to Mr. Kevin Cloe, and your letter of June 12, 2006 to myself.

Within 30 days of your receipt of this letter, please submit a response to the comments in the enclosed Technical Review and/or an addendum to the proposal for Steps 3b and 4 of the SWMU 45 BERA. Also, at the same time, please submit up-dated schedules for completing the BERAs at both SWMUs 1 and 2, and at SWMU 45.

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

Sincerely yours,



Timothy R. Gordon
Remedial Project Manager
Caribbean Section
RCRA Programs Branch

Enclosure

cc: Ms. Yarissa Martinez, P.R. Environmental Quality Board, w/encl.
Mr. Julio I. Rodriguez Colon, P.R. Environmental Quality Board, w/encl.
Commander D. F. Kalal, Naval Activity Puerto Rico, w/encl.
Mr. Felix Lopez, USF&WS, w/encl.
Mr. Mark Kimes, w/encl.
Ms. Kathy Rogovin, Booz Allen & Hamilton, w/o encl.

TECHNICAL REVIEW

DRAFT STEPS 3B AND 4 OF THE BASELINE ECOLOGICAL RISK ASSESSMENT FOR SWMU 45 APRIL 20, 2006

NAVAL ACTIVITY PUERTO RICO (NAPR) CEIBA, PUERTO RICO

REPA3-2203-085

May 19, 2006

GENERAL COMMENTS

1. NAPR proposes collecting turtle grass tissue samples for analysis of arsenic, cadmium, selenium, and mercury. NAPR does not, however, propose collecting co-located sediment samples for analysis of the same metals. Collection and analysis of co-located sediment samples is recommended because such data would allow NAPR to relate plant tissue concentrations to sediment concentrations, which will be necessary if calculated risks indicate the need for remedial action. These data would also permit verification that the collected turtle grass samples are from areas that are representative of the range of sediment concentrations observed in the embayment downgradient of solid waste management unit (SWMU) 45. NAPR should include collection and analysis of co-located sediment samples in the study design, or discuss the reasons for their exclusion.
2. Table 4-1 indicates that no further action may be recommended in the event that toxicity is observed in the *Leptocheirus plumulosus* tests, but no dose-response relationship is observed for Aroclor-1260. It should be noted that, under this circumstance, additional evaluation may be warranted to determine which constituent(s) are likely causing the observed toxicity, and whether these constituent(s) are site related. In the screening-level ecological risk assessment, exceedences of sediment screening values were noted for constituents other than Aroclor-1260; thus, it is plausible that one or more of these other constituents could contribute to any observed toxicity. For this reason, it is suggested that NAPR include a broader suite of analytes in the chemical analyses of toxicity test sediments. Inclusion of these analyses in the current effort may prevent unnecessary additional toxicity testing in the future. NAPR should also revise the "Decision Recommendations/Actions" in Table 4-1 to indicate that further evaluation may be necessary if toxicity is observed that cannot be attributed to Aroclor-1260.

Additionally, it should be noted that conclusions about the acceptability of risk based on statistical tests will be contingent upon the power of the statistical test. A lack of significant difference in a statistical test of very low power may not provide sufficient support for a conclusion of no further action. Table 4-1 should be revised to include this qualifying factor in the "Decision Recommendations/Actions" column.