



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

AUG 17 2006

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Mark E. Davidson  
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 PR2170027203,

- 1) SWMU 45 Baseline Ecological Assessment Steps 3b and 4, dated July 26, 2006.
- 2) Draft RFI Work Plan for SWMUs 16, 27, 28, 29, 42 and AOC C, dated July 13, 2006.

Dear Mr. Davidson:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the above two documents.

SWMU 45 Baseline Ecological Assessment (BERA) Steps 3b and 4, dated July 26, 2006

EPA has completed its review of the July 26, 2006 revised proposal for Steps 3b and 4 of the SWMU 45 Baseline Ecological Assessment and your responses to address EPA's comments of June 22, 2006. As part of our review, EPA requested our contractor, Booz Allen Hamilton (BAH) to review the revised proposal and responses to EPA's comments. Based on this review EPA has determined that both are acceptable. Please commence implementation of Steps 3b and 4 of the BERA pursuant to the schedule given in Figure 6-1 of the BERA. That schedule indicates that "field verification" will begin on September 11, 2006, and that implementation of the data collection required under Steps 3a and 4 of the BERA is to commence November 2, 2006. If you wish to propose alternative dates for implementation, please submit a revised Figure 6-1 (schedule) within 15 days of your receipt of this letter; otherwise the schedule given in Figure 6-1 of the BERA shall apply.

Draft RFI Work Plan for SWMUs 16, 27, 28, 29, 42 and AOC C, dated July 13, 2006

EPA has completed its review of the Draft RFI Work Plan for SWMUs 16, 27, 28, 29, 42 and AOC C, dated July 13, 2006 (the Work Plan). The work plan is designed to implement Phase I RFIs at these 6 SWMUs and AOCs, and is expected to be required under the draft 7003 Order currently under development. As part of our review, EPA requested our contractor, Booz Allen Hamilton (BAH) to review the work plan. Based on this review, several items require clarification and/or revision, prior to EPA's approval of the Work Plan. These are discussed in the enclosed Technical Review. Within 25 days of your receipt of this letter, please submit revised pages and Figures and/or written responses which address the comments in the enclosed technical review.

Also, for both of the above proposals/work plans, at least 14 days prior to commencement of any sample collection activities, please advise myself and Mr. Manuel Vargas of the PREQB. Mr. Vargas can be contacted at 787-767-8181 ext. 3583, or via Email at [ManuelVargas@jca.gobierno.pr](mailto:ManuelVargas@jca.gobierno.pr).

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.  
Pedro Ruiz, Naval Activity Puerto Rico, w/encl.  
Mr. David Criswell, U.S. Navy, BRAC PMO SE, w/encl.  
Mr. Felix Lopez, USF&WS, w/encl.  
Ms. Kathy Rogovin, Booz Allen & Hamilton, w/o encl.

## TECHNICAL REVIEW

### DRAFT RCRA FACILITY INVESTIGATION WORK PLAN FOR SWMUs 16, 27, 28, 29, AND 42, AND AOC A

#### NAVAL ACTIVITY PUERTO RICO CEIBA, PUERTO RICO

REPA3-2203-090  
AUGUST 3, 2006

## I SPECIFIC COMMENTS

### Section 3.0, Scope of Investigation

1. Although the introductory paragraph of this section indicates that site topography, facility operational features, and anticipated groundwater flow direction were considered in selecting sampling locations for the Phase I RCRA Facility Investigation (RFI), rationale should be provided to explain why proposed sampling locations at solid waste management unit (SWMU) 27 are clustered at the northeastern corner of the sludge drying beds. In addition, justification should be provided for the lack of proposed sampling locations west of the water purification plant lagoons at SWMU 42. According to Section 2.1.5, topography in this location moves from a high point in the east to a low point in the west. Given this surface topography, it is possible that runoff and/or releases from the lagoons moved westward, and a sampling location in this direction seems appropriate.

### Section 3.1, Soil Sampling and Analysis

2. Based on its former usage as a torpedo shop, it would appear that samples collected at area of concern (AOC) A (i.e., soil, groundwater, wipes, and concrete chips) should also be analyzed for explosives constituents. The RFI work plan should be revised in this section and subsequent related sections addressing the other media referenced above. If sufficient justification exists for omitting the requested analysis, such rationale should be provided for review.

### Section 3.4, Sediment Sampling and Analysis Program

3. According to this section, sediment samples will be homogenized before being placed into sample jars and sent to the analytical laboratory. To minimize volatilization and loss of constituents prior to analysis, the portion of each sediment sample to be sent for volatile organic compound (VOC) analysis should be containerized before homogenization is performed.

#### Section 4.0, Reporting

4. Because the scope of the proposed Phase I RFI field efforts is not extensive, it is recommended that a single combined summary report be prepared for all of the SWMUs and AOC included in this RFI work plan, rather than a set of six separate reports. In addition, because background information appears to be similar between the sites (e.g., SWMUs 27-29), individual reports could be highly repetitive and inefficient to produce and review.

#### Section 4.4, Nature and Extent of Contamination

5. According to this section, NAPR proposes to screen soil and groundwater results against EPA Region III Risk-Based Concentrations (RBCs). Whereas the Region III RBCs consider exposure via ingestion and inhalation routes, EPA Region IX Preliminary Remediation Goals (PRGs) also consider exposure via dermal contact. For this reason, the PRGs are generally considered more conservative indicators of risk, and screening of site data against the PRGs is typically preferred over the use of EPA Region III RBCs. Unless specific justification can be provided for the use of Region III RBCs, the work plan should be revised to mandate use of Region IX PRGs for screening soil and groundwater results.

#### Section 6.1, Project Team Responsibilities

6. According to this section, Ms. Janna Staszak will serve as the Activity Coordinator for this project. Figure 6-1, however, indicates that Ms. Jamie Butler will be serving in this position. Revise the RFI work plan to indicate the actual staffing for this assignment.

#### Table 3-7, Method Performance Limits

7. NAPR should revise this table as needed to specify the most recent version of each method (e.g., SW7470A, SW7471A, SW9012B, SW9030B). EPA's online test methods manual (found at: [www.epa.gov/epaoswer/hazwaste/test/main.htm](http://www.epa.gov/epaoswer/hazwaste/test/main.htm)) should be consulted in responding to this comment. The same revisions should be incorporated into Table 3-4 of the RFI work plan.

#### Figure 1-2, Location Map

8. It is extremely difficult to identify the locations of the various SWMUs and AOC A on this figure. Unit labels for the SWMUs/AOCs to be investigated under this work plan should be made significantly more prominent in order to increase the usability of this figure.

Figure 3-7, Proposed Wipe and Concrete Chip Sampling Locations at AOC A

9. The color-coding shown in the legend for this figure is reversed, and should be corrected to identify red flags as wipe sample locations and blue flags as concrete chip sample locations.