

From: Gordon.Timothy@epamail.epa.gov [mailto:Gordon.Timothy@epamail.epa.gov]  
Sent: Wednesday, December 23, 2009 2:07 PM  
To: mark.e.davidson@navy.mil  
Cc: Kimes, Mark; wilmarierivera@jca.gobierno.pr; GloriaToro@jca.gobierno.pr;  
AScacifero@TechLawInc.com  
Subject: NAPR - PREQB Review - SWMU 9 (Nov 19 Responses and Proposal for Add. Sampling)

Mark,

We have received TechLaw's review of the Nov 19, 2009 Navy Response to EPA's Sept 17, 2009 Comments on the SWMU 9 Draft Full RFI Report (July 14, 2009) and the Proposal for Additional Sampling at SWMU 9. TechLaw made the following comment,.

The Navy's response to EPA's General Comment 1 appears to be adequate. However, remedial options for the groundwater contamination in the vicinity of, and to the north and northwest (downgradient) of, wells 9SB41, 9SB42, and 9SB44 should be addressed during the Corrective Measures Study (CMS). In addition, if the eight temporary wells are still in place, it is recommended that groundwater samples be collected from them at the time of the proposed additional sampling effort to the east and northeast in order to obtain a current data set.

EPA concurs with the comment that if the eight temporary wells are still in place, it is recommended that groundwater samples be collected from them at the time of the proposed additional sampling effort to the east and northeast in order to obtain a current data set. If you are agreeable to that request, EPA will approve the Nov 19, 2009 Responses to EPA's Comments and the Proposal for Additional Sampling at SWMU 9.

If you are agreeable to this request, by February 1, 2010, please submit a letter cofirming that the Navy will attempt to collect groundwater elevation readings and samples (to be analyzed for Appendix IX VOCs and TPH DRO/GRO) in any of the 8 temporary wells that can still be accessed, along with a proposed schedule for implementing all the additional sampling at SWMU 9 and submitting the revised Draft Final RFI Report incorporating those results, per the Nov 19, 2009 letter from Mark Kimes of Baker Enviro on behalf of the Navy,

In addition, please advise when you will submit responses addressing the attached PREQB comments.

Thanks, and Happy Holidays to All!

Timothy R. Gordon  
U.S. Environmental Protection Agency  
RCRA Programs Branch  
Resource Conservation and Special Projects Section 290 Broadway, 22nd. Floor New York, NY  
10007-1866 Phone (212) 637-4167

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Mark,

Attached below are comments received from PREQB on the Nov 19, 2009 Navy Response to EPA's Sept 17, 2009 Comments on the SWMU 9 Draft Full RFI Report (July 14, 2009) and the Proposal for Additional Sampling at SWMU 9. I hope to receive comments from TechLaw (EPA's consultant) by COB today and will forward those when received.

Timothy R. Gordon  
U.S. Environmental Protection Agency  
RCRA Programs Branch  
Resource Conservation and Special Projects Section 290 Broadway, 22nd. Floor New York, NY  
10007-1866 Phone (212) 637-4167  
----- Forwarded by Timothy Gordon/R2/USEPA/US on 12/23/2009 10:19 AM  
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wilmarierivera@jca.gobierno.pr

12/16/2009 11:34 AM  
To  
Timothy Gordon/R2/USEPA/US@EPA  
cc  
[GloriaToro@jca.gobierno.pr](mailto:GloriaToro@jca.gobierno.pr)  
Subject  
PREQB Review - SWMU 9

Mr. Gordon,

Here is PREQB Review of the Navy Response to comments on the Draft RCRA Facility Investigation SWMU 9 - Area B, Tank 214 Area and Additional Sampling Proposal, naval Activity Puerto Rico, Ceiba, Puerto Rico, PR2170027203. Hard copy will follow.

Please give me a call if you have any questions.  
Merry Christmas!!

(See attached file: PREQBReviewResponsetoCommentsDraftFullRFISWMU9.pdf)

Wilmarie Rivera  
Federal Facilities Coordinator  
Puerto Rico Environmental Quality Board  
Tel. (787) 767-8181 x. 6141  
Cel. (787) 365-8573(See attached file:  
PREQBReviewResponsetoCommentsDraftFullRFISWMU9.pdf)



COMMONWEALTH OF PUERTO RICO  
OFFICE OF THE GOVERNOR  
ENVIRONMENTAL QUALITY BOARD

Environmental Emergencies Response Area

December 16, 2009

Timothy Gordon  
US Environmental Protection Agency – Region II  
290 Broadway – 22<sup>nd</sup> Floor  
New York, New York 10007-1866

**Re: Draft Full RCRA Facility Investigation  
SWMU 9 – Area B, Tank 214 Area  
Response to PREQB Comments and  
Additional Sampling Proposal  
Naval Activity Puerto Rico (NAPR), Ceiba  
EPA ID No. PR2170027203**

Dear Mr. Gordon:

The Federal Facility Coordinator (FFC) and the Hazardous Wastes Permits Division (HWPD) has finished the review of the above-mentioned document. The Environmental Quality Board received it on November 23, 2009.

Joint comments of the HWPD and the office of EQB's Federal Facility Coordinator are being forwarded to EPA and the facility to avoid duplicity. If you have any additional comments or questions please feel free to contact Gloria M. Toro Agrait at (767) 787-8181 extension 3586 or myself at extension 6141.

Cordially,

Wilmarie Rivera  
Federal Facilities Coordinator  
Environmental Emergencies Response Area

cc. Gloria M. Toro Agrait, Environmental Permits Officer

***PREQB Review of Responses to comments on  
Draft RCRA Facility Investigation  
SWMU 9 – Area B, Tank 214 Area (July 14, 2009) and  
Additional Sampling Proposal  
Naval Activity Puerto Rico, Ceiba  
PR2170027203***

**Additional Sampling:**

1. Please analyze a subset of the new sediment samples for a full suite of metals and PAHs to fully document the spatial extent of previously documented exceedances of petroleum constituents and to provide data to evaluate risks to human health and the environment.
2. The last sentence in the third bullet on page 2 describes the proposed sediment sampling for lead to better understand findings from the CMS investigation. The text indicates samples 9SD177 through 9SD181 will be analyzed for lead. Please add two samples to analyze sample locations 9SD182 and 9SD183. Figure 6-8 of the RFI indicates the southeastern corner of the elevated lead extends into the location occupied by 9SD182, so lead analysis of 9SD182 is needed. Lead analysis of 9SD183 is also suggested to ensure that the lateral extent of lead contamination has been determined. Note that sample 9SD183 will already be collected for TPH DRO analysis, so the only cost is the additional single lead analysis.

**Evaluation of Response to Comments:**

The responses to PREQB's comments are acceptable with the exception of the following comment responses discussed below.

**General Comments:**

1. Evaluation of Response to PREQB General Comment 4 and Page-Specific Comment 22. The response is acceptable with as long as the bullet list of Eco-SSLs listed in the response are used for screening soil, rather than just considered, unless adequate justification is provided for not using one of the wildlife Eco-SSLs provided in this list.
2. Evaluation of Response to General Comment 6 and Page-Specific Comments 23, 29 and 30. As organic lead is a constituent of leaded gasoline, please include an evaluation of tetraethyl lead in the baseline risk assessments (for both ecological and human health) where the fraction of lead considered to be organic is estimated and the potential risks evaluated initially using appropriate screening criteria and then in the baseline risk assessments if identified as a chemical of potential concern.

## Page Specific Comments:

1. Evaluation of Response to PREQB Comment 2c, Page 4-2, Section 4.1. The procedure described in the response (i.e., shipping samples in a cooler packed with ice), is the procedure used for refrigerated samples, not frozen samples. Therefore, please clarify whether the samples were received at the laboratory in a frozen state.
2. Evaluation of Response to PREQB Comment 8, Page 4-5, Section 4.8, Paragraph 1. Please revise the text of the report to address the potential for both negative and positive bias introduced by the wrong type of tubing used. In addition, the usability of these data are highly questionable based on the use of incorrect tubing combined with the lack of flow rate measurements as discussed in PREQB Comment 31a. These data should only be used for screening purposes and not as definitive measurements of contamination in groundwater samples at the site. Please revise the text to reflect the limited usability of these data. When resampling the wells, please ensure that the proper procedures are used in order to obtain definitive data for use in delineation and assessing risk at the site.
3. Evaluation of Response to PREQB Comment 9, Page 4-8, Section 4.10.5 Clarification should be made that the comment was referring that the fact of Multi-site blank preparation is not clearly stated at the approved work plan, independent of procedure for its preparation. The intention of the comment is to be noted for future work plans, in order to clearly state that the rinsate blank collected for the subject investigation will be shared with other sampling activities being carried on the same date.
4. Evaluation of Response to PREQB Comment 12, Page 5-1, Section 5.1, last paragraph. Please include a reference to the nature and extent discussion in Section 6.4 and include a discussion in Section 6.4 of the nature and extent of contamination in the vicinity of this sample, as petroleum odors were detected at this location.
5. Evaluation of Response to PREQB Comment 13, Figures 5-2 to 5-4. Please redraw these figures so that the elevation, stratigraphy, and thickness at a location are consistent and accurate between the figures. For example, the stratigraphy at location 9SB44 is different in Figure 5-3 and Figure 5-4, yet the stratigraphy is the same in the field. Additionally, it is confusing to indicate general elevation information that is inconsistent with precise elevation data. For example, point 9SB41, with an elevation of 108.93, should be drawn within the 110-ft contour.
6. Evaluation of Response to PREQB Comment 14, Page 5-3, Section 5.2.4, paragraph 2. Please include the reference for the porosity in this section of the report.

7. Evaluation of Response to PREQB Comment 15, Page 6-1, Section 6.1. Please include a discussion of the potential for soil contamination to be a continuing source of contamination to groundwater, as this should be part of a discussion of nature and extent of contamination.
8. Evaluation of Response to PREQB Comment 17, Page 6-2, Section 6.1.2.1. Please see Evaluation of Response to PREQB General Comment 4.
9. Evaluation of Response to PREQB Comment 19, Page 6-3, Section 6.1.2.1. Please incorporate the response in the text of this section.
10. Evaluation of Response to PREQB Comment 24, Page 6-7, Section 6.1.3 and Tables 6-1 to 6-6. Please include PREQB's cleanup levels for TPH-GRO and TPH-DRO in the tables. The tables currently show "NE", which is defined in the footnotes as "Not Established" for both TPH-GRO and TPH-DRO in the same column where the Total TPH value of 100 mg/kg is listed (Regional Screening Levels Residential). PREQB has established a cleanup level of 100 mg/kg for both TPH-GRO and TPH-DRO. Therefore, please list these values or state "NA" (Not Applicable) rather than stating that no value exists for these two TPH fractions.
11. Evaluation of Response to PREQB Comments 26 and 32a, Tables 6-1 to 6-7 and Appendices A and B. PREQB acknowledges that this issue is currently under discussion.
12. Evaluation of Response to PREQB Comment 31a, Appendix A. Flow rate measurements are required in order to comply with EPA Region II low-flow sampling procedures. The usability of these data are therefore questionable based on the lack of flow rate measurements combined with the use of incorrect tubing, as discussed in PREQB Comment 8. These data should only be used for screening purposes and not as definitive measurements of contamination in groundwater samples at the site. Please revise the text to reflect the limited usability of these data. The text must also be revised to reflect the limited usability of these data. When resampling the wells, please ensure that the proper procedures are used in order to obtain definitive data for use in delineation and assessing risk at the site.