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From: Gordon.Timothy@epamail.epa.gov
Sent: Thursday, June 08, 2006 3:00 PM
To: Tom.Roth@CH2M.com; Davidson, Mark E CIV EFDSOUTH
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Subject: Re: NAPR/Roos Rds - Pineros Island Work Plan Review
Attachments: Roos Rds Pineros REPA3-2203-087.pdf



Roos Rds Pineros
 REPA3-2203-08...

Tom and Mark,

In addition to the below attached technical review comments from EPA Region 2's contractor (Booz Allen), I have the following comments:

- 1) Figure 1-4 shows a structure labled "Storage Facility", yet no discussion of the nature of what was stored there is given. Please discuss what activities occurred at this "Storage Facility", including a discussion of whether materials or wastes that contained hazardous constituents or substances were stored there.
- 2) Revise the title of Section 3.5.1 (pg 3.5) to "Soil Sampling Program" (instead of Field Operations).
- 3) Revise Section 3.5.1 (pg 3.5 and 3.6) to include soil sample locations at the "Storage Facility" and the Bivouac Area, both of which are shown on Figure 1-4. Also, increase the number of environmental samples for VOCs, SVOCs, Pesticides/PCBs, and RCRA metals to at least 9 sampling locations to include: two samples each at both the Storage Facility and the Bivouac Area, plus two samples (instead of 1) at the currently proposed helicopter pad, one sample at each of the 2 crab trap areas, and one background sample. Also, add a discussion indicating that the soil samples for explosive residues will be distributed over various sites/locations, and will not be concentrated at a limited number of sites.
- 4) Revise Section 1.2 (pg. 1-2) as follows: In third sentence, put a period after the word determination, and delete the rest of that sentence.

Note - I may have a few more, but the above are my major comments/concerns. In addition, Doug Maddox of EPA HQs should be sending comments to me tomorrow. Call me if any questions (though I'm out tomorrow).

(See attached file: Roos Rds Pineros REPA3-2203-087.pdf)

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**TECHNICAL REVIEW OF THE RESPONSE TO EPA COMMENTS
ON THE WORK PLAN TO CONDUCT A
PHASE I RCRA FACILITY INVESTIGATION**

**PIÑEROS AND CABENZA DE PERRO ISLANDS
NAVAL ACTIVITY PUERTO RICO**

REPA3-2203-087

June 8 2006

EPA COVER LETTER COMMENTS

EPA Cover Letter Comments 4 and 5: The responses indicate that the text of Section 2.2.7 has been revised; however, there is no Section 2.2.7 in the May 2006 Final Work Plan (WP) to Conduct Phase I RCRA Facility Investigation (RFI) Report. The responses should be revised to reference the appropriate section.

EPA Cover Letter Comment 5: The response requires additional detail. EPA is requesting that a more comprehensive Conceptual Site Model (CSM) be prepared. The CSM should identify all potentially complete exposure pathways, including the identification of potential source media, receptors, and routes of exposure. This is to ensure that all appropriate media and contaminant transport mechanisms have been considered for the purposes of sampling, for which the results will be used to assess risks. Specifically noted is the lack of discussion regarding access to bunker trail and whether there are potential receptors (e.g., hikers) who may obtain access. Additionally, there is a lack of discussion regarding the specific exposure pathways for each receptor. For example, the CSM mentions potential receptors such as land crabbers, beach visitors and snorklers, but does not specify the environmental media and exposure pathways to which these receptors may potentially be exposed. The CSM should be revised to include the specific exposure media and pathways for each receptor (e.g., for the beach visitor, potentially complete exposure pathways might include ingestion of and dermal contact with surface water runoff and sediment, and direct contact with munitions and explosives of concern [MEC]; for the recreational fisher, potentially complete exposure pathways might include ingestion of fish and/or shellfish).

In addition, the text indicates that a screening assessment will compare concentrations with regulatory and/or risk-based criteria. The text should specify the specific criteria that will be used for screening.

EPA ENCLOSURE III

EPA General Comment 2: The response indicate that the text of Section 2.2.4 has been revised; however, there is no Section 2.2.4 in the May 2006 WP. The response should be revised to

reference the appropriate section.

EPA General Comment 10: Although the area of planned vegetation removal in Section 3.2.2 has been revised, a typographical error suggests that the clearing are will range from 0 to 4 acres in size. The text should be further corrected to eliminate the error and specify a proposed vegetation removal area of 0.4 acre.

STANDARD OPERATING PROCEDURE (SOP) REVIEW COMMENT

Except for a typographical error in Section III.A. of SOP A-2 (where the text should refer to SOP A-3), the SOPs provided in Appendix E appear to be acceptable. However, several of the procedures make reference to other SOPs that have not been provided for review. SOPs that appear to be appropriate for the planned effort and should be added to Appendix E include the SOPs for equipment decontamination (cited in SOP A-2) and packaging and shipping procedures (cited in SOP A-3).