

**Baker**

**Baker Environmental, Inc.**  
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March 18, 2003

U.S. Environmental Protection Agency – Region II  
290 Broadway – 22<sup>nd</sup> Floor  
New York, New York 10007-1866

Attn: Mr. Adolph Everett, P.E.  
Chief, RCRA Program Branch

Re: Contract N62470-95-D-6007  
Navy CLEAN, District III  
Contract Task Order (CTO) 0099  
U.S. Naval Station Roosevelt Roads (NSRR), Puerto Rico  
RCRA/HSWA Permit No. PR2170027203  
Draft Recharacterization Work Plan SWMU 11

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with two copies of the Draft Recharacterization Work Plan for SWMU 11. This work plan reflects the modifications requested in your letter dated March 8, 2002. Responses to EPA comment letter dated March 8, 2002 on the March 31, 1998 SWMU 11 – Building 38 Old Power Plant Sampling Results and Recharacterization Work Plan are included for your review. This submittal is in accordance with EPA's letter of March 8, 2002 and the Navy letter dated May 14, 2002.

If you have questions regarding this submittal, please contact Mr. Kevin Cloe, P.E. at (757) 322-4736. Additional distribution has been made as indicated below.

Sincerely,

**BAKER ENVIRONMENTAL, INC.**



Mark E. Kimes, P.E.  
Activity Manager

MEK/lp  
Attachments

cc: Mr. Kevin R. Cloe, LANTDIV - Code EV23KRC (1 copy)  
Ms. Madeline Rivera, NSRR (1 copy)  
Mr. Tim Gordon, US EPA Region II (2 copies)  
Ms. Kathy Rogovin, Booz Allen & Hamilton (1 copy)  
Mr. Carl Soderberg, US EPA Caribbean Office (1 copy)  
Mr. Carmelo Vasquez, PR EQB (1 copy)  
Mr. John Tomik, CH2M Hill Virginia Beach (1 copy)

**Challenge Us.**

**NAVY RESPONSE TO EPA COMMENTS DATED MARCH 8, 2002**  
**SWMU 11 – BUILDING 38 OLD POWER PLANT**  
**SAMPLING RESULTS AND RECHARACTERIZATION WORKPLAN**  
**NAVAL STATION ROOSEVELT ROADS**  
**CEIBA, PUERTO RICO**  
**MARCH 31, 1998**

**EPA Comments**

*In regards to PCB contamination, the most significant comment is that since, at this time the future disposition of the building has not been determined, the specific sampling and clean-up requirements cannot be fully defined. Ultimately, the intended future disposition of the building must be defined in determining the clean-up requirements. Among comments on the re-characterization work plan itself, the enclosed memo recommends that:*

- 1) floor areas where the 1996 sampling found PCB contamination to be less than 10 µg/100cm<sup>2</sup> should be re-evaluated with wipe samples to determine if the extent of contamination has been substantially changed as a result of the 1998 fire;*
- 2) likewise the most highly contaminated areas in the 1996 sampling, as well as wall locations sampled in 1996, should be re-evaluated with wipe samples to determine if the extent of contamination has been substantially changed by the fire;*
- 3) however, wipe samples are no longer acceptable for determining clean-up levels for porous surfaces, including concrete. Bulk samples must be utilized to evaluate clean-up requirements. EPA recommends that the Re-characterization Sampling work plan be revised to also include a bulk sampling program as described in the enclosed memo.*

*In addition, as noted above, SWMU 11 has never been investigated for other potential contaminants, including asbestos, and/or hazardous wastes and hazardous constituents. EPA recommends that the revised work plan also include a screening program for other potential contaminants, including asbestos, and/or hazardous wastes and hazardous constituents inside SWMU 11. Otherwise, prior to any final determination as to the requirements for the final disposition of this SWMU, a subsequent investigation may be required following evaluation of PCB contamination at this SWMU.*

**Navy Response to EPA Comment**

The Draft Re-Characterization Work Plan outlines a sampling program for wipe samples from the previous sampling locations to assist in determining whether or not the contaminant concentrations inside the building have changed due to the fire. Additionally, concrete chip samples have been added to the draft work plan along with additional analytes as requested and discussed in a conference call with Tim Gordon on April 22, 2002. In addition, an asbestos condition assessment has been added to the work plan.

**EPA Comments from Pesticides and TSCA Branch**

*We have reviewed the Sampling Results and Recharacterization Workplan dated March 31, 1998 for SMU #11. At this time the future disposition of the building has not been determined.*

*The proposed sampling workplan relies on wipe samples for determining concentrations of polychlorinated biphenyls (PCBs) on surfaces and takes into consideration that levels of contamination may have been affected by a fire in the building subsequent to the last sampling event.*

*Substantial changes were made to the PCB regulations, 40 C.F.R. Part 761, in the PCB Disposal Rule issued on June 29, 1998 and amended on June 24, 1999.*

*If the building were intended to be sold it would have to be remediated in accordance with 40 C.F.R. § 761.61 for use prior to the sale (40 C.F.R. § 761.20(c)).*

*Cleanup or disposal of the building materials is to be based on the actual PCB concentration as found, on a dry weight basis. Cleanup levels in porous materials, like concrete, are to be determined based on bulk samples. Wipe samples can be used to focus on areas with the highest contamination but are no longer used for determining cleanup levels for porous surfaces unless cleanup is commenced within 72 hours of the release.*

*In the new sampling plan some wipe samples should be obtained from floor areas where PCB contamination was less than 10 gm/100 cm<sup>2</sup> to assess if the extent of contamination has been substantially changed by the fire. For the same reason, some wipe samples should be taken in the most contaminated areas and on the walls (at the same height as previously sampled). These wipe samples are intended to evaluate if the impact of the fire on contamination was substantial. Bulk samples should be taken in the most highly contaminated areas to determine PCB contamination within the concrete. The bulk sample results would be primary information used to evaluate further actions.*

*PCB bulk samples should be taken from the top ½-inch of concrete. If deeper penetration of PCBs is anticipated, additional samples of material ½-inch to 1½ or deeper can be taken at the same time as the ½ inch depth samples. New samples of the walls should be near (e.g., within 2 feet of) the floor as the likely area of the highest contamination is near the floor.*

*Any low level where oils may have contacted concrete for long periods of time would be likely to be among the most highly contaminated. The tunnels/pits were found in the reported sampling to contain PCBs sludge and other materials at 50 ppm or greater in 14 of 17 samples. There does not seem to be any reason to resample this material, we suggest that it all be considered to contain PCBs at 50 ppm or greater.*

*Remediation under 40 C.F.R. § 761.61 generally requires PCB contamination to be reduced to 1 ppm or less unless engineering controls and deed restrictions are established and maintained. Cleanup levels up to 100 ppm are addressed in pre-determined cleanups found at 40 C.F.R. § 761.61(a). Other risk-based cleanups can be authorized under 40 C.F.R. § 761.61(c) and coordinated with RCRA corrective action risk based cleanups under 40 C.F.R. § 761.77 (Coordinated Approvals).*

*With the appropriate bulk sample information the remediation options of cleaning surfaces, removing concrete, or implementing another method consistent with 40 C.F.R. § 761.61 may be evaluated. If material from the building or the building itself were to be disposed, the areas with PCB concentrations of 50 ppm or greater in the concrete could be defined.*

*The PCB regulations do not have requirements on the disposal of material that contains less than 50 ppm on an as found basis except for the particular uses banned under 40 C.F.R. § 761.20(c). If a remediation is performed under 40 C.F.R. § 761.61(a) the disposal methods within that section are allowed. Material containing PCBs at concentrations of 50 ppm or greater may be disposed in a TSCA landfill or incinerator as authorized under 40 C.F.R. § 761.61(b). Other criteria and methods*

*of disposal of PCBs at concentrations of 50 ppm or greater may be included in a risk based approval authorized under 40 C.F.R. § 761.61(c).*

Another option in the regulations for use is found at 40 C.F.R. § 761.30(p), which allows contaminated surfaces that are double washed/double rinsed and encapsulated to be used. This is not a remediation and is not included in 40 C.F.R. § 761.20(c) as an option that would permit the distribution in commerce (e.g. sale) of the contaminated area.

**Navy Response to EPA Comments from Pesticides and TSCA Branch**

A lot of the information provided in this comment is informational and has been utilized in the development of the Draft Recharacterization Work Plan. Sampling of the previous locations and concrete bulk samples are being proposed in the work plan as recommended in the above comment. No sampling of the sludge's from within the tunnels/pits are recommended.