



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

**MAY 11 2010**

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 PRD2170027203,

- 1) SWMU 69 (Aircraft Parking Area) – Draft Sampling Strategy for Disturbed Soil Sampling
- 2) SWMU 56/Site 56A – Source Area Investigation Report
- 3) SWMU 56 (Hanger 200 Apron) – Functional Assessment and Supplemental Sediment Sampling Report
- 4) AOC F – Site 1738 Draft MTBE Investigation Work Plan
- 5) SWMU 61 (Former Bundy Vehicle Maintenance Facility) – Revised Corrective Measures Study (CMS) Investigation Plan

Dear Mr. Davidson:

This letter is addressed to you as the Navy's designated project coordinator pursuant to the January 29, 2007 RCRA Administrative Order on Consent ("the Consent Order") between the United States Environmental Protection Agency (EPA) and the U.S. Navy (the Navy).

EPA has completed its review of the above documents, and has the following comments:

SWMU 69 (Aircraft Parking Area) – Draft Sampling Strategy for Disturbed Soil Sampling

EPA has completed its review of the proposal outlined in the April 20, 2010 letter submitted by Michael Baker Jr., Inc. on behalf of the Navy. The purpose of the proposal is to re-characterize an area of contaminated soils (as described in the December 3, 2008 Draft Corrective Measures Study (CMS) Report, now withdrawn by the Navy) which were inadvertently disturbed in August 2008 by contractors for the Puerto Rico Ports Authority (PRPA), the current property owner.

The proposal is to sample surface soil (0 to 1 foot bgs) and subsurface soil (1 to 3 feet bgs) at a total of 52 locations adjacent to the southern edge of the "expanded" aircraft parking apron in two rows on a 50-foot by 50 foot grid pattern. In addition, soil/sediment samples will be collected at eleven locations in the drainage ditch adjacent to the southern edge of the apron. The analytical program for the samples will include all metals in the 40 CFR Part 264 Appendix IX list. The proposed sampling will be implemented pursuant to procedures given in the December 2007 CMS Work Plan for SWMU 69.

EPA concurs with the proposed sampling strategy. However, no schedule is given with the April 20, 2010 letter for implementation of this sampling or for incorporating the results into a revised Draft CMS Report for SWMU 69, and submitting the revised CMS report to EPA. Therefore, within 30 days of your receipt of this letter, please submit a schedule for implementation of this sampling and incorporating the results into a revised Draft CMS Report for SWMU 69, and submitting the draft report to EPA.

#### SWMU 56/Site 56A – Source Area Investigation Report

EPA has completed its review of the Responses to EPA's comments on the January 2010 SWMU 56/Site 56A – Source Area Investigation Report, which were included with the April 23, 2010 letter submitted by Michael Baker Jr., Inc., on behalf of the Navy. EPA concurs with the Navy's proposal to designate the 56A area as a new SWMU or Area of Concern (AOC), and to develop a draft Phase I RFI Work Plan to complete characterization of that new SWMU or AOC. Therefore, within 60 days of your receipt of this letter, please submit a draft Phase I RFI Work Plan, and a letter designating the 56A area as either SWMU 80 or AOC G, pursuant to the requirements of the Consent Order.

#### SWMU 56 – Functional Assessment and Supplemental Sediment Sampling Report

EPA has completed its review of the Responses, which were included with the April 23, 2010 letter submitted by Michael Baker Jr., Inc., on behalf of the Navy, addressing EPA's comments on the December 2009 SWMU 56 – Functional Assessment and Supplemental Sediment Sampling Report. EPA concurs with the Navy's responses and the proposal to revise the September 2009 Draft CMS Report to incorporate information contained in the Functional Assessment and Supplemental Sediment Sampling Report; Navy Responses of January 15, 2009 to EPA and PREQB comments, and the newly established background soil data set and freshwater drainage ditch data set.

Therefore, pursuant to the schedule included with your April 23 letter, within 60 days of your receipt of this letter, please submit a revised Draft CMS Report for SWMU 56 to EPA.

AOC F – Site 1738 Draft MTBE Investigation Work Plan

EPA has completed its review of the proposal outlined in the April 29, 2010 letter submitted by Michael Baker Jr., Inc., on behalf of the Navy. The purpose of the proposal is to: 1) complete characterization of the MTBE plume present at Site 1738; and 2) implement a pilot-scale treatability study to determine the effectiveness of in-situ, enhanced bioremediation, using oxygen releasing compound to create aerobic conditions within the aquifer.

EPA concurs with the approach to completing characterization and implementing a pilot-scale treatability study, as described in the April 29, 2010 letter. Therefore, within 60 days of your receipt of this letter, please submit a draft CMS work plan to implement both the additional characterization of the MTBE plume present at Site 1738 and a pilot-scale treatability study to determine the effectiveness of in-situ, enhanced bioremediation in addressing the MTBE plume as defined following the additional MTBE plume characterization work. The CMS work plan can be a “streamlined” type CMS work plan, as described in Section 23.F (b), on page 24, of the Consent Order.

SWMU 61 – Revised Corrective Measures Study (CMS) Investigation Plan

EPA has completed its review of the revisions to the investigation proposal given in the March 11, 2010 letter submitted by Michael Baker Jr., Inc. on behalf of the Navy. These revisions acceptably address the comments made in EPA’s letter of February 18, 2010. Since the additional sampling proposed for SWMU 61 has now been implemented, the Navy should submit the draft CMS report to EPA, incorporating the additional sampling results, by June 8, 2010, as implied by the schedule included with the March 11, 2010 letter. If the Navy wishes to request a revised due date for submission of the draft CMS report, please submit the request for such an extension before June 8, 2010.

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

Sincerely yours,



Timothy R. Gordon

Project Coordinator

Resource Conservation and Special Projects Section

RCRA Programs Branch

cc: Ms. Wilmarie Rivera, P.R. Environmental Quality Board.  
Ms. Gloria Toro, P.R. Environmental Quality Board  
Mr. Mark Kimes, Baker Environmental  
Mr. Jonathan Flewelling/Cathy Dare, TechLaw Inc.  
Mr. Felix Lopez, USF&WS