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March 21, 2011

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

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

Re: Contract N62470-10-D-3000
IQC for A/E Services for Multi-Media
Environmental Compliance Engineering Support
Delivery Order (DO) JM01
U.S. Naval Activity Puerto Rico (NAPR)
EPA I.D. No. PR2170027203
Revised Final Full RCRA Facility Investigation Work Plan for SWMU 78

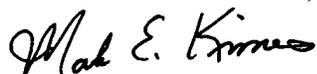
Dear Mr. Everett:

Michael Baker Jr., Inc. (Baker), on behalf of the Navy, is pleased to provide you with one hard copy and one electronic copy provided on CD of the replacement pages that make up the Revised Final Full RCRA Facility Investigation Work Plan for SWMU 78. Directions for inserting these pages into the Final Full RCRA Facility Investigation Work Plan for SWMU 78 are enclosed.

This report is being submitted in accordance with EPA comments dated February 9, 2011. The Navy responses to these comments are attached for your review. Additional distribution has been made as indicated below.

If you have questions regarding this submittal, please contact Mr. Mark Davidson at (843) 743-2124.

Sincerely,

MICHAEL BAKER JR., INC.

Mark E. Kimes, P.E.
Activity Coordinator

MEK/vk
Attachments

cc: Ms. Debra Evans-Ripley, BRAC PMO SE (letter only)
Mr. David Criswell, BRAC PMO SE (letter only)
Mr. Mark E. Davidson, BRAC PMO SE (1 hard copy and 1 CD)
Mr. Pedro Ruiz, NAPR (1 CD)
Mr. Tim Gordon, US EPA Region II (1 hard copy and 1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy and 1 CD)
Ms. Gloria Toro, PREQB (1 hard copy and 1 CD)
Ms. Wilmarie Rivera, PREQB (1 CD)
Ms. Bonnie Capito, NAVFAC Atlantic – Code EV42 (1 hard copy)
Mr. Felix Lopez, US F&WS (1CD)
Ms. Brenda Smith, TechLaw, Inc. (1 CD)

**NAVY RESPONSES TO EPA AND PREQB COMMENT LETTER DATED FEBRUARY 9, 2011
FINAL FULL RCRA FACILITY INVESTIGATION WORK PLAN
SWMU 78 (POLE YARD) DATED OCTOBER 14, 2010
MARCH 21, 2011**

(Regulator comments are provided in italics, while the Navy responses are provided in regular print.)

EPA COMMENTS

GENERAL COMMENTS

General Comment 1. The Work Plan is lacking several elements required by EPA Requirements of Quality Assurance Project Plans (QA/R-5), dated March 2001. For example:

- Laboratory specific information (e.g., laboratory specific standard operating procedures, reporting limits, quality control (QC) limits, analytical equipment maintenance, and calibration) has not been provided.*
- Quality control acceptance criteria have not been provided.*
- There is no discussion on how data will be verified or validated.*
- There is no discussion of how precision, accuracy, representativeness, comparability and completeness and sensitivity (PARCCS) measures will be incorporated into a usability report or if an evaluation of significant trends and biases will be included as part of a data quality assessment.*
- Examples of all forms and checklists to be used have not been provided (e.g., chain-of-custody forms, sample labels, audit checklists, data validation checklists).*
- There is no discussion of corrective action procedures.*

Revise the Work Plan to provide the level of detail as discussed in QA/R-5.

Navy Response: The Navy plans to implement this investigation at NAPR in accordance with the EPA approved Master Project Management Plan (PMP), Master Data Collection Quality Assurance Plan (DCQAP), Data Management Plan (DMP), and Master Health and Safety Plan (HASP) for NAPR (Baker, 1995. Final RCRA Facility Investigation Management Plans, Naval Station Roosevelt Roads, Ceiba, Puerto Rico. September 14, 1995. Coraopolis, Pennsylvania.) The EPA approved the work plan on September 25, 1995. These Master Plans define acceptable data requirements and error levels associated with the field and analytical portions of this investigation. Therefore, to maintain consistency with past Navy work under the Consent Agreement, this work plan has been revised using the Navy's EPA approved Master Plans for this facility.

In response to previous comments by the EPA on Phase I RFI Work Plans for SWMUs 62 and 71 (see the April 17, 2008 letter from Baker on behalf of the Navy to the EPA); the Navy provided an evaluation of the Master Project Plans (Baker, September 14, 1995) in relation to the QA/R-5 requirements ("EPA Requirements for Quality Assurance Project Plans." EPA/240/B-01/003. [EPA, March 2001]). Table 1 of the April 17, 2008 letter provides a map between the DCQAP sections, the work plan content and the sections required by QA/R-5 and illustrates that although there are format and minor content differences, the DCQAP is generally consistent with and includes all of the main elements required by QA/R-5. For example, data validation is discussed in Section 10 of the DCQAP; PARCCS measures are discussed in Section 4 of the DCQAP; and forms and checklists are provided in the tables and appendices of the DCQAPP. Some additional examples of forms and checklists that may be found in the DCQAP are shown in the following table:

Item	Location in the DCQAP
System Audit Checklist	Table 12-1
Test Boring Record	Appendix B – SOP F101 – Borehole and Sample Logging
Typical Monitoring Well Construction Details and Test Boring and Well Construction Records	Appendix B – SOP F103 – Monitoring Well Installation
Chain of Custody Form	Appendix B – SOP F302 – Chain of Custody
Sample Label	Appendix B – SOP F302 – Chain of Custody
Data Validation Checklists	Appendix D – Data Validation Methodologies

There are a number of new forms that are primarily associated with groundwater sampling. These include the Well Detail and Sampling Log, the Low Flow Purge Data Sheet and the Daily Meter Calibration Record. Although groundwater is not expected to be encountered at SWMU 78, the contingency for installation and sampling of groundwater monitoring wells is included in the Work Plan. Consequently, the new groundwater sampling and equipment calibration forms will be included as an appendix to the Full RFI Work Plan for SWMU 78.

The analytical methods, analyte lists, detection limits, etc. may have changed to some degree since publication of the DCQAP. Consequently, the Full RFI Work Plans contain the following tables specifying the sampling and analytical program requirements so that data of sufficient quality for future risk management decisions is collected:

- Table 3-1 Summary of Sampling and Analytical Program – Environmental Samples
- Table 3-2 Summary of Sampling and Analytical Program – QA/QC Samples
- Table 3-3 Method Performance Limits

The information provided in these tables has been reviewed against screening levels and have been determined to generally meet these levels. Table 3-3 has been revised to include preparation methods. Ecological screening values are presented on Tables 4-1 and 4-2. In addition, a table with Human Health Screening Values (Table 4-3) and NAPR Background Screening Values (Table 4-4) were added for easy comparison to the analytical method detection limits. These quantitation limits have also been reviewed by the analytical laboratory to ensure that they can be met. In all cases, the quantitation limits are the lowest achievable by the laboratory for the specified analytical method. These tables are then provided to the analytical laboratory subcontractor as part of their scope of work so that the laboratory is clearly aware of the analytical requirements of the project. Additionally, only laboratories capable of providing an acceptable Laboratory Quality Manual (LQM) will be selected for this project. The LQM will be provided to USEPA after selection of the analytical laboratory.

This evaluation (presented in the April 17, 2008 letter), which was approved by EPA on May 13, 2008, indicated that the Phase I RFI Work Plan structure, with reference to the 1995 Master Project Plans and inclusion of project-specific tables summarizing the sampling and analysis program for environmental and QA/QC samples and method performance limits, and other factors as discussed in the April 17, 2008 letter, when taken together provide the information and guidance necessary for the project team to generate good quality data and to use that data for developing risk management based recommendations and decisions. The structure of the Full RFI Work Plans for SWMUs 62, 71 and 78 is identical to the Phase I RFI structure and therefore meets the QA/R-5 QAPP requirements.

EPA Evaluation of Responses to General Comment 1: *The response partially addresses the comment. However, because the laboratory has not been selected, laboratory specific standard operating procedures (SOPs) and quality control (QC) limits have not been included in the Final Work Plan. Additionally, Table 3-3 states that the quantitation limits (QLs) listed for soil are based on wet weight*

and that the quantitation limits calculated by the laboratory, calculated on dry weight basis, will be higher. Since screening levels are based on dry weight calculations, it is unclear whether the laboratory's dry weight QL will be able to meet screening levels. It is recommended that the laboratory quantitation limit be at least five to ten times lower than the screening level to account for moisture content in the sample and inherent variability of analytical results at the quantitation limit. Ensure that when a laboratory is selected, laboratory specific SOPs and QC limits are included and that the laboratory will be able to meet screening levels.

Navy Response: The comment is noted. As indicated in our previous response, to help ensure that screening levels are met, required quantitation limits are provided to the laboratory as part of their contractual scope of work. Upon the selection of the subcontracted analytical laboratory for this investigation, laboratory specific SOPs and QC limits will be reviewed to confirm they will be able to meet the applicable screening levels. The analytical laboratory's specific SOPs, QC limits, and QLs will be included as an addendum to the draft Full RFI Report. Additionally, upon further review of Table 3-3, it was discovered that outdated QLs were included in error for SW-846 Method 6020A (ICP/MS) analysis of groundwater. Therefore, Table 3-3 will be revised to include the most current QLs available for Method 6020A.

General Comment 10. *Consistent with EPA guidance and following agreements with the Navy, inorganics that exceed human health risk-based screening criteria cannot be eliminated from the quantification of risk and hazard regardless of background concentrations. Specifically, the EPA raised this issue in a comment letter dated January 23, 2009 on the Draft Final Correctives Measure Study for Solid Waste Management Unit (SWMU) 68. The Navy responses to the EPA comment letter, dated June 12, 2009, stated that chemicals detected above risk-based screening criteria will be retained as Chemicals of Potential Concern (COPCs) and assessed under total baseline conditions. The Navy's responses further stated that those chemicals at or below background levels (non-site related) will be discussed as part of the risk characterization and then exit the risk assessment process. This approach is consistent with U.S. Navy Human Health Risk Assessment Guidance (available at [http://www.nmcphc.med.navy.mil/downloads/ep/Chapters 201-12.pdt](http://www.nmcphc.med.navy.mil/downloads/ep/Chapters%201-12.pdt)). Note that this approach appears to be acceptable based EPA's approval letter dated August 6, 2009 on the Final Corrective Measure Study for SWMU 68 (Baker, 2009b).*

Ensure that the Work Plan is revised so as to be consistent with these previous agreements to ensure consistency among all HHRAs performed at NAPR SWMUs and compliance with EPA recommended risk assessment methodologies. HHRAs conducted for NAPR SWMUs should quantify risk and hazard for any and/or all inorganic compounds that exceed residential or industrial health-based screening criteria. Further, the uncertainty analysis, presented as part of the risk characterization, should include a refinement of risk. This refined risk evaluation should present a breakdown of the total risk as site-related risk and background risk. This will provide the basis for exiting such inorganic COPCs from the HHRA process (i.e., show that such inorganic COPCs should exit at the end of Tier 2, Baseline HHRA, and not continue to the Tier 3 process, risk assessment for selection of remedial alternatives).

With respect to ecological risk assessments, the Navy's approach is generally consistent with EPA guidance because inorganic compounds are not excluded based on background in Step 2 (Tier I) of the Navy's ERA process, and Step 3.a (Tier 2) does include a refinement of risk based on statistical background comparisons (much like the refinement of risk conducted as part of the HHRA uncertainty analysis).

Navy Response: The Navy offers the following points of clarification relative to this comment. As discussed in the Navy's general response to USEPA comments, as well as the Navy response to General Comment No. 7, the Full RFI analytical data will not be statistically compared to background analytical data as part of the Full RFI. Instead, Full RFI analytical data will be compared to the background-screening values (i.e., ULM background concentrations) presented within the Revised Final II Summary

Report for Environmental Background Concentrations of Inorganic Compounds, Naval Activity Puerto Rico, Ceiba, Puerto Rico [Baker, 2010]), as well as human health and ecological screening values, to define the extent of contamination that was detected by the Phase I RFI. Exceedances of human health and/or ecological screening values and background screening values will result in the site moving to a Corrective Measures Study (CMS) with the preparation of a Draft CMS Work Plan; a HHRA and ERA will be conducted as part of the CMS as detailed in the CMS Work Plan

Inorganic concentrations below background levels will be eliminated from further consideration as site-related contaminants in the Full RFI. However, this does not eliminate them from the quantification of risk in the event an HHRA is warranted. Rather, in HHRAs conducted for NAPR all chemicals detected above risk-based screening criteria, regardless of whether those chemicals are at or below background, are retained as COPCs and evaluated quantitatively as part of the total baseline HHRA. In addition, a refinement of total site (where the term “site” refers to the SWMU under evaluation) risk addressing the contribution of background to risk (i.e., risks from those chemicals at or below background levels [non-site related]) would be included as part of the uncertainty analysis and risk characterization. Those chemicals whose SWMU-specific concentrations and associated risk/hazard are attributable to background would then exit the risk assessment process, which is consistent with *U.S. Navy Human Health Risk Assessment Guidance*.

EPA Evaluation of the Response to EPA General Comment 10: *The response is partially adequate. The Final Work Plan has been revised to include the human health screening values (i.e., Regional Screening Levels [RSLs] and Maximum Contaminant Levels [MCLs]), and background screening values in Table 4-3 and Table 4-4, respectively. However, Table 4-3 does not properly reference the table footnotes. Revise Table 4-3 to properly reference the notes used in the table, and ensure that the source of the total petroleum hydrocarbons (TPH) diesel range organics (DRO) RSLs is provided in the footnotes. Additionally, ensure that the latest RSLs (November 2010) are used in the RFI.*

Navy Response: Table 4-3 will be revised to include the references for the notes used in the table. Additionally, Puerto Rico Water Quality Standards (PRWQS) will be added to Table 4-3. The most current version of the RSLs available at the time the SWMU 78 Full RFI is completed will be used for screening purposes.

General Comment 13. *Maximum Contaminant Levels (MCLs) will be used to screen groundwater data; however, MCLs are not solely risk-based. Groundwater exceedances of risk-based screening criteria warrant a HHRA unless land use controls (LUCs) and/or institutional controls (ICs) are in place at SWMU 78 to prevent consumption of groundwater (e.g., residential development). If a HHRA is warranted again, note that the identification of groundwater COPCs should be selected based on the Tap Water Regional Screening Level (RSL) and not the MCL.*

Navy Response: MCLs will be used only as one of the screening tools in the Full RFI. As indicated in Section 4.6.2, USEPA Regional Tap Water SLs and inorganic background levels also will be used for groundwater screening in the Full RFI for SWMU 78. It is acknowledged in Section 4.6.2.2 that MCLs are not solely risk-based. Note that it is not the objective of the Full RFI to evaluate the potential for human health risks. Further evaluation of the potential for human health risks will be conducted as part of a CMS investigation. In HHRAs conducted for NAPR, only risk-based screening criteria are used in the COPC selection process. As such, MCLs are not used to identify groundwater COPCs. No revisions to the text of the Full RFI Work Plan for SWMU 78 are required.

EPA Evaluation of the Response to EPA General Comment 13: *The Navy’s response does not fully address the intent of EPA General Comment 13. EPA and TechLaw are aware that Section 4.6.2, Human Health Screening Values, indicates that Tap Water RSLs will be used in the Full RFI screening for groundwater, but acknowledges that MCLs will also be used. The intent of EPA General Comment 13 was to recommend that where EPA Tap Water RSLs are more protective than MCLs, EPA Tap Water*

RSLs be used in determining and delineating the nature and extent of contamination in groundwater. Given that a Human Health Risk Assessment (HHRA) will not be conducted as part of the RFI, it is important the RFI data evaluation confirms or justifies the decisions about whether or not SWMU 78 will be recommended for a CMS. Since CMS decision-making will be based on risk-based screening levels, the use of EPA Tap Water RSLs rather than MCLs (when EPA Tap Water RSLs are more protective) is recommended. While MCLs are the regulatory limit, delineating to the EPA Tap Water RSL, when RSLs are more protective than MCLs, will allow for a more protective data evaluation in the RFI in support for/against a CMS. Revise the RFI Work Plan to clarify that EPA Tap Water RSLs will be used to delineate any groundwater contamination when EPA Tap Water RSLs are more protective than MCLs, or alternatively, provide justification for not following this approach either in the RFI Work Plan or the subsequent RFI Report.

Navy Response: The first paragraph of Section 4.6.2 will be revised to state the following:

“In the case of groundwater comparison to human health screening criteria conducted as part of the Full RFI, the Regional Tap Water RSLs will be used to delineate the nature and extent of contamination in groundwater when the RSLs are more protective.”

SPECIFIC COMMENTS

Specific Comment 5. *Section 3.5.3, Investigation Derived Waste Management, Page 3-8: It is not clear if investigation derived waste (IDW) will be combined from multiple wells into one 55-gallon drums or if each well will have its own drum. It would not be possible to replace the soil cuttings into the boring from which they came if the soil cuttings are combined from multiple borings into one 55-gallon drum. Revise the Work Plan to clarify this information.*

Navy Response: The soil cuttings associated with subsurface soil sampling will be placed back into the location where the cuttings were collected immediately after the subsurface soil samples are collected if a monitoring well is not going to be installed at that soil boring. If a monitoring well is going to be installed at a soil boring location, the soil cuttings associated with that soil boring will be stored temporarily in a 55-gallon drum. All the soil cuttings for soil borings that have monitoring wells installed will be placed in the same drum (there will not be one drum for each soil boring) and a composite sample will be collected and submitted for laboratory analysis. The text in Section 3.5.3 will be edited to clarify the IDW procedures.

EPA Evaluation of Response to Specific Comment 5: *The response addresses the comment. However, text in Section 3.5.3 does not match the text of the response. For example, Section 3.5.3 states that soil cuttings from the subsurface soil sampling will not be placed back into the boring from which they came if contamination is present. It is not clear where these soil cuttings will be stored while a determination is made. Revise Section 3.5.3 to include the response text.*

Navy Response: Section 3.5.3 will be revised to include the following text:

“All the soil cuttings for soil borings that have monitoring wells installed will be placed in the same drum (there will not be one drum for each soil boring) and a composite sample will be collected and submitted for laboratory analysis. However, the soil cuttings associated with subsurface soil sampling will be placed back into the location where the cuttings were collected immediately after the subsurface soil samples are collected if a monitoring well is not going to be installed at that soil boring. Furthermore, soils last out of the hole will be returned first as much as possible, thereby approximating original stratigraphy.”

Specific Comment 8. *Section 4.7, Conclusions and Recommendations, Page 4-7: This section states that information from the physical and analytical results will be synthesized into conclusions regarding site*

conditions. However, this section does not describe how data usability will impact the conclusions and recommendations. Revise the section to address this issue.

Navy Response: All analytical laboratory data will be validated to ensure data usability. In the data validation narrative, the usability of the data is discussed for each Sample Delivery Group that is received from the laboratory.

EPA Evaluation of Response to Specific Comment 8: *The response addresses the comment. However, Section 4.7 has not been revised to address the response. Revise Section 4.7 to include the information presented in the response.*

Navy Response: The first paragraph of Section 4.7 will be revised to include the following text:

“As previously discussed, all analytical laboratory data will be validated to ensure data usability. In the data validation narrative included as part of the Full RFI, the usability of the data is discussed for each Sample Delivery Group that is received from the laboratory. The data validation reports (DVRs) in the draft Full RFI report should include discussions on surrogates, internal standards, post digest spikes, field duplicates, the extent of outlier exceedances, which results were affected, and how results were qualified.”

PREQB COMMENTS

EVALUATION OF RESPONSES TO PREQB COMMENTS

PREQB Evaluation of Page-Specific Comment 1:

Page 3-1, Section 3.1.

c. *Please consider the inclusion of soil borings to the west of 78SB05 to allow for the collection of surface and subsurface soil samples based on the presence of metals at concentrations that exceed one or more of the screening values (as presented in the data tables included as Appendix B).*

Navy’s Response: The EPA approved Phase I RFI report did not recommend further sampling around 78SB05. The Navy feels that additional samples west of 78SB05 are not necessary for further characterization at the SWMU.

PREQB Evaluation of Response: *It is PREQB’s preference that additional samples be collected around 78SB05 to further characterize metals exceeding screening criteria. However, as EPA did not require additional samples in this area, PREQB will defer to EPA.*

Navy Response: Comment noted.

PREQB Evaluation of Page-Specific Comment 6:

Page 3-8, Section 3.5.3, Paragraph 1. *Please clarify the handling of soil IDW. The work plan indicates that soil cuttings associated with subsurface soil sampling will be stored temporarily in 55-gallon drums and will be placed back in the borings unless contamination is present. Please clarify if there will be a drum dedicated to the soil derived from each boring location to prevent co-mingling of soils from multiple borings.*

Navy’s Response: The soil cuttings associated with subsurface soil sampling will be placed back into the location where the cuttings were collected from immediately after the subsurface soil samples are collected if a monitoring well is not going to be installed at that soil boring. If a monitoring well is going to be installed at a soil boring location, the soil cuttings associated with that soil boring will be stored

temporarily in a 55-gallon drum. All the soil cuttings for soil borings that have monitoring wells installed will be placed in the same drum (there will not be one drum for each soil boring) and a composite sample will be collected and submitted for laboratory analysis. The text in Section 3.5.3 will be edited to clarify the IDW procedures.

PREQB Evaluation of Response: Consistent with other work plans for NAPR investigations, please include text that “as much as possible, soils last out of the hole will be returned first, thereby, approximating original stratigraphy.”

Navy Response: Refer to Navy response to EPA Evaluation of Responses to Specific Comment 5.

PREQB Evaluation of Page-Specific Comment 7:

Table 3-3.

d. The quantitation limits (QLs) listed for metals in aqueous samples appear very high and more appropriate for analysis via 6010C instead of 6020A. Please verify these QLs with the laboratory and/or procure a laboratory that is capable of reporting lower QLs. Most of the listed QLs appear to be high by about one order of magnitude compared to QLs typically reported by method 6020A. It is important to note that many of the aqueous metals QLs exceed the risk screening levels (ecological groundwater screening levels presented in Table 4-2 as well as the May 2010 EPA Regional Screening Levels [RSLs]) and therefore lower QLs are needed in order to achieve project objectives. Specific exceedances of risk screening levels are as follows:

- i. Antimony QL (20) > EPA Tap water RSL (1.5)
- ii. Arsenic QL (10) > EPA Tap water RSL (0.045)
- iii. Cadmium QL (5) > EPA Tap Water RSL (1.8)
- iv. Chromium QL (10) > EPA Tap Water RSL (0.043)
- v. Cobalt QL (10) > EPA Tap Water RSL (1.1)
- vi. Vanadium QL (10) > EPA Tap Water RSL (0.26)
- vii. Copper QL (20) > ecological groundwater screening levels (3.73)
- viii. Nickel QL (4) > ecological groundwater screening levels (8.28)
- ix. Silver QL (10) > ecological groundwater screening levels (0.23)
- x. Benzo(a)anthracene QL (0.2) > ecological groundwater screening levels (0.025)

Navy Response: The Navy conducted a comparison of quantitation limits from different laboratories and found that the quantitation limits for Method 6020A Review RTC on Full RFI Work Plan SWMU 78 provide lower reporting limits than Method 6010C. The Navy is aware that many of the reporting limits exceed the ecological groundwater screening levels presented in Table 4-2 as well as the May 2010 Regional Screening Levels.

PREQB Evaluation of Response: It is PREQB’s preference for the quantitation limits to meet the data quality objectives. Please note that for all metals, the QLs provided by the Navy for the 6020 analysis of surface water samples are much higher than QLs typically observed by PREQB for this method. The table below compares typical QLs to those provided by the Navy as well as the standard EPA CLP methodology for ICP/MS. Please provide additional information as to why your lab cannot achieve typical QLs for this method.

<i>Quantitation Limits for SW-846 Method 6020A (ICP/MS)</i>						
<i>Metals by ICP/MS</i>		<i>SWMU 78 Proposed QLs</i>	<i>Lab 1 QLs</i>	<i>Lab 2 QLs</i>	<i>Lab 3 QLs</i>	<i>EPA CLP Method QLs</i>
<i>(ug/L)</i>	<i>Antimony</i>	<i>20</i>	<i>0.05</i>	<i>1.0</i>	<i>0.5</i>	<i>2</i>
<i>6020A</i>	<i>Arsenic</i>	<i>10</i>	<i>0.5</i>	<i>0.40</i>	<i>0.5</i>	<i>1</i>
	<i>Barium</i>	<i>10</i>	<i>0.05</i>	<i>50</i>	<i>0.5</i>	<i>10</i>
	<i>Beryllium</i>	<i>4.0</i>	<i>0.03</i>	<i>0.40</i>	<i>0.5</i>	<i>1</i>
	<i>Cadmium</i>	<i>5.0</i>	<i>0.03</i>	<i>0.50</i>	<i>0.5</i>	<i>1</i>
	<i>Chromium</i>	<i>10</i>	<i>0.2</i>	<i>10</i>	<i>0.5</i>	<i>2</i>
	<i>Cobalt</i>	<i>10</i>	<i>0.03</i>	<i>NA</i>	<i>0.5</i>	<i>1</i>
	<i>Copper</i>	<i>20</i>	<i>0.1</i>	<i>NA</i>	<i>0.5</i>	<i>2</i>
	<i>Lead</i>	<i>5.0</i>	<i>0.03</i>	<i>1.0</i>	<i>0.5</i>	<i>1</i>
	<i>Nickel</i>	<i>40</i>	<i>0.2</i>	<i>5.0</i>	<i>0.5</i>	<i>1</i>
	<i>Selenium</i>	<i>10</i>	<i>1.5</i>	<i>5.0</i>	<i>1</i>	<i>5</i>
	<i>Silver</i>	<i>10</i>	<i>0.03</i>	<i>0.50</i>	<i>0.5</i>	<i>1</i>
	<i>Thallium</i>	<i>10</i>	<i>0.03</i>	<i>0.20</i>	<i>0.5</i>	<i>1</i>
	<i>Tin</i>	<i>10</i>	<i>0.1</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>
	<i>Vanadium</i>	<i>10</i>	<i>0.3</i>	<i>5.0</i>	<i>0.5</i>	<i>5</i>
	<i>Zinc</i>	<i>20</i>	<i>0.75</i>	<i>20</i>	<i>5</i>	<i>2</i>

- (1) Columbia Analytical Services, Kelso, Washington (DoD Certified)*
- (2) Con-test Analytical in East Longmeadow, MA*
- (3) Alpha Analytical in Westborough, MA*

Navy Response: As indicated in our previous response to EPA General Comment 1 (refer to Navy response to EPA Evaluation of Responses to General Comment 1 within this document) , to help ensure that screening levels are met, required quantitation limits are provided to the laboratory as part of their contractual scope of work. Upon the selection of the subcontracted analytical laboratory for this investigation, laboratory specific SOPs and QC limits will be reviewed to confirm they will be able to meet the applicable screening levels. Additionally, upon further review of Table 3-3, it was discovered that outdated QLs were included in error for SW-846 Method 6020A (ICP/MS) analysis of groundwater. Therefore, Table 3-3 will be revised to include the most current QLs available for Method 6020A.