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April 23, 2010

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

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

Re: Contract N69450-08-C-0093
Corrective Action for SWMUs 14, 56, 68 and 69
Naval Activity Puerto Rico, Ceiba, Puerto Rico
U.S. Naval Activity Puerto Rico (NAPR)
EPA I.D. No. PR2170027203
Letter Report – SWMU 56/Site 56A Source Area Investigation Report

Dear Mr. Everett:

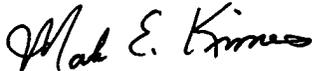
Michael Baker, Jr., Inc. (Baker), on behalf of the Navy, is pleased to provide you with one hard copy of the Response to USEPA and PREQB Comments, proposed project schedule, and a replacement figure for the Letter Report for the SWMU 56/Site 56A Source Area Investigation Report, Naval Activity Puerto Rico. Please replace Figure 4 in your Letter Report dated January 13, 2010 (SWMU 56/Site 56A Source Area Investigation Report) with the revised figure included as part of this submittal.

This document is being submitted in accordance with EPA comments dated February 18, 2010 and PREQB comments dated February 5, 2010.

If you have questions regarding this submittal, please contact Mr. Mark Davidson at (843) 743-2124. Additional distribution has been made as indicated below.

Sincerely,

MICHAEL BAKER JR., INC.



Mark E. Kimes, P.E.
Activity Coordinator

MEK/lp
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)
Mr. Pedro Ruiz, NAPR (1 hard copy)
Mr. Timothy Gordon, EPA Region II (1 hard copy)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy)
Mr. Felix Lopez, US F&WS (1 hard copy)
Mr. Jonathan Flewelling, TechLaw, Inc. (1 hard copy)
Ms. Wilmarie Rivera, PREQB (1 hard copy)
Ms. Gloria Toro, PREQB (1 hard copy)

NAVY RESPONSES TO EPA COMMENT LETTER DATED FEBRUARY 18, 2010

**EPA COMMENTS ON THE JANUARY 13, 2010
LETTER REPORT – SWMU 56/56A SOURCE AREA INVESTIGATION REPORT**

EPA COMMENTS

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

EPA GENERAL COMMENT No. 1

- 1. The interim report concluded that “While contamination is indicated by sediment analytical data, it cannot be definitively...” linked to Building 207, and therefore additional investigation is recommended. EPA concurs with the recommendation. Therefore, within 60 days of your receipt of this letter please submit a work plan and a schedule for implementing the additional investigations to determine if Building 207 is the likely source of the elevated metal concentrations detected in the drainage ditch sediments, and/or whether or not that those drainage ditch sediments should be addressed as part of the areas impacted by releases from SWMU 56, or whether Building 207 and the impacted drainage ditch sediments should be addressed as a new SWMU or Area of Concern.*

In addition, by letter dated February 5, 2010 to myself, the PREQB has indicated its agreement with the conclusions and recommendations made in the Source Area Investigation report, but noted several minor comments on the report. A copy is enclosed. Therefore, within 60 days of your receipt of this letter please also submit an addendum to the report addressing minor comments made in PREQB’s February 5, 2010 letter.

Navy Response to EPA General Comment No. 1: A schedule for implementing additional investigations is included as Figure 1. The schedule will be implemented and a Draft Phase I RFI Work Plan will be developed to determine if Building 207 is the likely source of the elevated metals concentrations detected in the drainage ditch sediments. The Navy has decided to designate this area as a new SWMU or Area of Concern.

An addendum to the letter report will be provided that will address the minor comments noted in the February 5, 2010 PREQB letter as discussed below.

**PREQB COMMENTS (DATED FEBRUARY 5, 2010) ON THE JANUARY 13, 2010 LETTER
REPORT – SWMU 56/56A SOURCE AREA INVESTIGATION REPORT**

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

PREQB agreed with the conclusions and recommendations presented at the report. However, have the following minor comments to be considered by the Navy:

- 1. PREQB Comment No. 1: Table 2, Page 4 of 6, the concentration of Beryllium for sample number 56A-SD08 should be underlined.*

Navy Response to PREQB Comment No. 1: Beryllium is reported as 0.55 UJ on page 4 of 8 on Table 2. The qualifier “UJ” is considered a non-detected value; therefore an underline is not required for this analytical result as a non-detected value does not exceed any listed screening values on the Table.

2. *PREQB Comment No. 2: Figure 4 should be revised to:*

- a. *Correct the Site ID for 56A-SD03, the table presents SD01 instead of SD03.*
- b. *Explain why the Beryllium concentration of sample 56A-SD06 is shaded, against what ecological screening value was compared.*
- c. *Revise the concentrations of Beryllium and Cadmium at sample 56A-SD08 to agree with the concentrations on Table 2.*

Navy responses to items a through c is presented below.

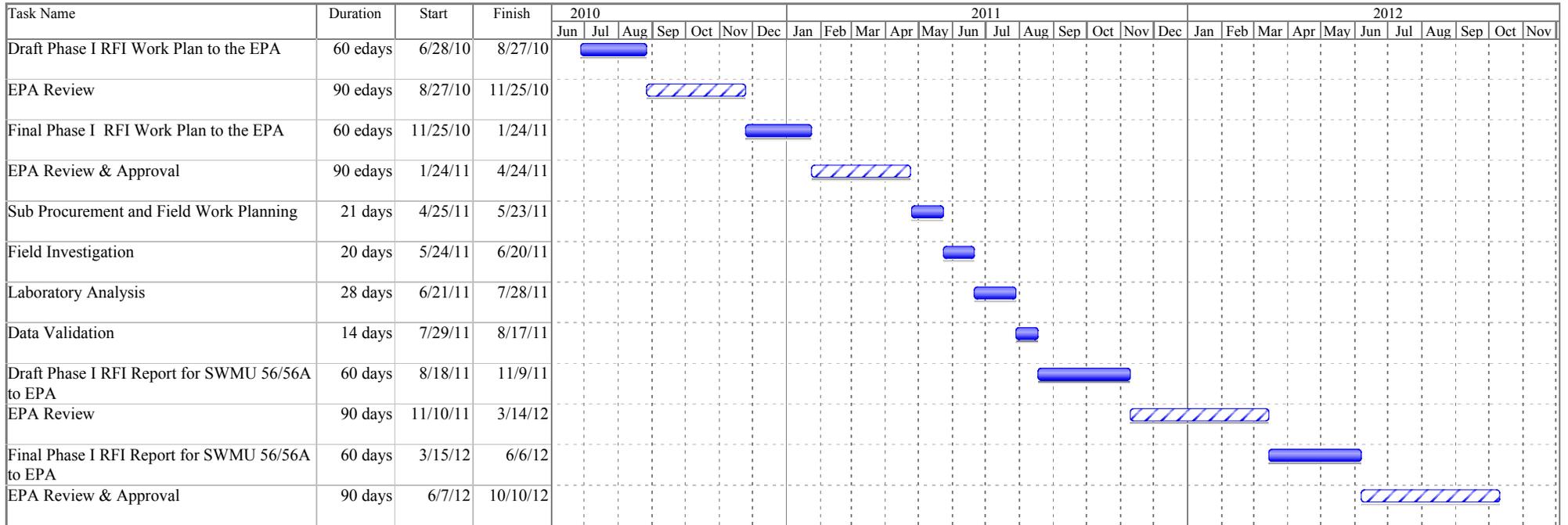
a: The Site and Sample ID for 56A-SD03 on Figure 4 will be edited to be 56A-SD03, not SD01.

b: The Beryllium concentration (0.6 milligrams per kilogram [mg/kg]) on Figure 4 should not be shaded since there is not an ecological screening value available to compare beryllium against. Figure 4 will be edited to reflect that beryllium does not exceed its ecological screening value.

c: The concentrations of beryllium and cadmium for sample 56A-SD08 on Figure 4 were revised to be consistent with Table 2. In so doing, the concentrations of these compounds no longer exceed screening criteria and were therefore deleted from Figure 4.

FIGURES

**FIGURE 1
PROPOSED PROJECT SCHEDULE
DRAINAGE DITCH NEAR BUILDING 207
PHASE I RFI WORK PLAN
NAVAL ACTIVITY PUERTO RICO, CEIBA, PUERTO RICO**



Site ID	56SD08
Sample ID	56SD08
Date	9/25/2008
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	4.8 J
Cobalt	85 J
Copper	240 J
Vanadium	430 J

Site ID	56A-SD06
Sample ID	56A-SD06
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	3.9
Beryllium	0.6 J
Cobalt	46.1 J
Copper	163 J
Vanadium	319

Site ID	56SD11
Sample ID	56SD11
Date	9/25/2008
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	3.1 J
Cobalt	46 J
Cadmium	0.36 J

Site ID	56A-SS02
Sample ID	56A-SS02
Date	9/25/2008
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	4.1

Site ID	56A-SD05
Sample ID	56A-SD05
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Cobalt	62.6 J
Tin	8.3 J

Site ID	56A-SD04
Sample ID	56A-SD04
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Cobalt	63.3 J
Nickel	29.5 J

Site ID	56A-SD01
Sample ID	56A-SD01
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	17.3 J
Cobalt	59.5 J
Lead	216 J
Nickel	24.6 J

Site ID	56A-SD03
Sample ID	56A-SD03
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Mercury	0.18

Site ID	56A-SS04
Sample ID	56A-SS04
Date	9/25/2008
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	6.2
Lead	23.1 J

Site ID	56A-SS04
Sample ID	56A-SS04D
Date	9/25/2008
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	5
Lead	22.4 J

Site ID	56A-SD10
Sample ID	56A-SD10
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Cobalt	53.5 J
Vanadium	242

Site ID	56A-SD10
Sample ID	56A-SD10D
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Cobalt	50.6 J
Vanadium	267 J

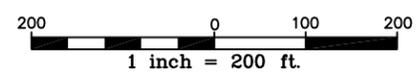
Site ID	56A-SD08
Sample ID	56A-SD08
Date	6/23/2009
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	3.4 J
Barium	213 J
Cobalt	81.1 J
Tin	9.9 J
Vanadium	275 J

Site ID	56SD09
Sample ID	56SD09
Date	9/25/2008
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	3.2 J
Cadmium	0.82 J
Lead	46 J
Zinc	410 J

Site ID	56A-SS03
Sample ID	56A-SS03
Date	9/25/2008
Depth Range (ft bgs)	0-0.33
Metals (mg/kg)	
Arsenic	2.8

Notes/Qualifiers:	
ug/L	microgram per kilogram
J	Estimated value
█	Exceeds Ecological Screening Value
BOLD	Exceeds Residential Regional Screening Level
<i>ITALICS</i>	Exceeds Industrial Regional Screening Level
<u>UNDERLINE</u>	Exceeds Basewide Background Value

NOTE
SAMPLE LOCATIONS APPROVED IN THE
FIELD BY PREQB ON JUNE 22, 2009



LEGEND	
	-SWMU BOUNDARY
	-WETLAND DELINEATION
PEM1	-THE COWARDIN WETLAND CLASSIFICATION SYSTEM
●	-SEDIMENT SAMPLING LOCATION
●	-SURFACE SOIL SAMPLE LOCATION
⊗	-2008 PRE-EXCAVATION SEDIMENT DELINEATION SAMPLE LOCATION ASSOCIATED WITH SWMU 56 CMS
—	-DRAINAGE DITCHES

FIGURE 4
DETECTED METALS IN SURFACE SOIL AND
SEDIMENT GREATER THAN RISK-BASED AND
BACKGROUND SCREENING CRITERIA
SOURCE AREA INVESTIGATION
SWMU 56/SITE 56A
NAVAL ACTIVITY PUERTO RICO