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Date: 1/17/2008 3:29 PM
Subject: NAPR - comments on SWMU 9 Area B RFI Tank 214 Work Plan
Attachments: NAPR TECHNICAL REVIEW OF SWMU 9 Area B RFI.08 Jan.doc

Mark,

Attached are our comments on the Nov 28, 2007 SWMU 9 Area B Tank 214 RFI Work Plan. Please advise whether you prefer that these be submitted formally (i.e., with an official letter), or if this Email is sufficient, and based on it you will submit Responses the the Comments and/or a revised Work Plan. Also, advise when you would submit those. Thanks.

(See attached file: NAPR TECHNICAL REVIEW OF SWMU 9 Area B RFI.08 Jan.doc)

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January 17, 2008
(Incorporates TechLaw Technical Review dated January 2, 2008)

**TECHNICAL REVIEW OF THE
NOVEMBER 28, 2007 DRAFT FULL RCRA FACILITY INVESTIGATION WORK
PLAN
FOR SWMU 9 AREA B, TANK 214**

The following comments were generated based on review of the November 28, 2007, *Draft Full RCRA Facility Investigation Work Plan for SWMU 9 Area B, Tank 214* (Work Plan), Naval Activity Puerto Rico (NAPR) Ceiba, Puerto Rico.

GENERAL COMMENTS

1. Section 2.2, Previous Investigations/Interim Corrective Measures, states that barium, lead, thallium and vanadium were detected in the site sediments and that these detections were above background concentrations; yet they are not included in the current investigations. Revise Sections 2 and 3 to clarify why these metals have not been included as constituents of concern in the Full RFI Work Plan.
2. It is unclear whether methyl tertiary butyl ether (MTBE) has ever been included as an analyte in previous investigations at SWMU 9. MTBE is a common gasoline additive. MTBE has substantially different transport and degradation properties than benzene and may present different remedial challenges. Please indicate in your responses whether MTBE has been included in the prior SWMU 9 investigations, and if not, why not, and summarize any past results, and indicate why it will not be included in the current sampling effort.
3. The data collected from the proposed temporary wells will be "screening" type data. The results will indicate whether there "is" or "is not" contamination in the shallow aquifer. If the resulting data exceeds screening levels, it may be necessary to install properly constructed wells in order to make risk-based decisions on potential impacts to human health and the environment. Please indicate in your responses whether the Navy will install permanent monitoring wells if the "screening" level data shows releases to groundwater.
4. The work plan does not identify the contractor that will be retained to implement the Work Plan; and several sections of the Work Plan repeatedly indicate contractor developed plans are to be submitted in the future. For example, Sections 3.3 and 3.7 note that the analytical laboratory and data validation contractors have not been selected, while Section 3.6.4 requires an equipment decontamination plan to be prepared by the contractor, and Section 3.6.6 requires a contractor health and safety plan (HSP). To be considered an acceptable RFI Work Plan, the document should either include all relevant plans, such as for equipment decontamination and the HSP, or cite applicable plans that have been previously approved by EPA Region 2 for usage under RCRA corrective action activities at the NAPR facility. If there are any such applicable plans that the Navy intends to utilize under this RFI Work Plan, please cite those in your responses.

5. The Schedule given in Figure 5-1 must be revised to include either target dates or the time intervals for implementation of the actual work (sample collection, analysis, and submission of the draft Final report, etc.).
6. The RFI Work Plan does not cite a specific Quality Assurance Project Plan (QAPP) to be followed in implementing the work. However, Section 7.0 References lists the 1995 Final RCRA Facility Investigation Management Plan for Naval Station Roosevelt Roads, which does contain a Master Data Quality Assurance Plan (DCQAP), previously approved by EPA. However, that DCQAP was developed before the March 2005 "Uniform Federal Policy for Implementing Environmental Quality Systems" (UFP-QAPP) was developed. Therefore, EPA requests that the Navy revise the RFI Work Plan to clearly cite the QAPP to be followed, and if the work will be follow procedures in the 1995 DCQAP, also discuss whether the DCQAP provides procedures that will produce data of sufficient quality to comply with the 2005 UFP-QAPP standards.