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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
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July 30, 2010

Mr. Kevin Cloe
Project Manager
Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Boulevard
Norfolk, VA 23508-1278

Re: Review of the Draft Post-Removal Supplemental Confirmatory Sampling and Analysis Plan Solid Waste Management Unit (SWMU) 6, Former Naval Ammunition Support Detachment, Vieques, Puerto Rico

Dear Mr. Cloe:

The U.S. Environmental Protection Agency (EPA) completed the review of the Draft Post-Removal Supplemental Confirmatory Sampling and Analysis Plan Solid Waste Management Unit (SWMU) 6, Former Naval Ammunition Support Detachment Vieques, Puerto Rico, dated May 2010. Enclosed you will find our comments.

If you have any questions or comments, please contact me at (787) 741-5201.

Sincerely,

Daniel Rodríguez
Remedial Project Manager
Response and Remediation Branch

Enclosure

cc: Wilmarie Rivera, EQB, w/ encl.
Richard Henry, FWS, w/encl.
Brett Doerr, CH2M Hill, w/ encl.

**EPA Comments on the Draft Post-Removal Supplemental Confirmatory
Sampling and Analysis Plan Solid Waste Management Unit (SWMU) 6
Former Naval Ammunition Support Detachment
Vieques, Puerto Rico
May 2010**

1. Worksheet #9a, page 19 – Project Scoping Session Participants Sheet: Under “Project Role” for Mindy Pensak please include review of ecological risk assessments.
2. Worksheet #9d, page 28 - Project Scoping Session Participants Sheet: Please include Stan Pauwels, Technical Support Contractor to EPA; ecological risk assessor.
3. Worksheet #9d, page 30 - Project Scoping Session Sheet: Under SWMU-6 Sampling Approach, the second paragraph under the third *Consensus* bullet indicates that “historic surface water and sediment data will not be used in the future HHRA ...” Please indicate whether the statement should refer to the ecological risk assessment, rather than the HHRA.
4. Worksheet # 10, pages 35 and 36 – Problem Definition, Environmental Questions to be Answered by the Supplemental Confirmatory Sampling: The response to the first question indicates that background surface water and sediment data set will be collected and analyzed for inorganic constituents to compare to site concentrations. As elevated concentrations (greater than ecological screening values) of pesticides have been identified in the sediments (Figure 13, Pesticide/PCB Detections and Exceedances in Sediment), it may make sense to include pesticide analysis for background sediment collection, similar to what was conducted for the background soil collection.
5. Worksheet # 11, page 37 – If the Method Detection Limit (MDL) will be used for comparisons to the action levels, the Navy should request that its laboratory report their results to the (MDL). It should be noted that results near the MDL (to around 5-10 times the MDL) should be used with caution.
6. Worksheet # 12, pages 41 - 48 – In order to avoid confusion, the actual measurement performance criteria should be listed, not a reference to another worksheet.
7. Worksheet # 13, page 53 – Secondary Data Criteria and Limitations Table: The third row includes 7 surface water samples and 12 sediment samples, which were collected during the RI in 2003. In the fourth column, “How Data Will Be Used” for the same row it is noted that “sampling results in areas not excavated will be used in the post-removal risk assessment.” Worksheet # 9d indicate that previously collected surface water and sediment data will not be used in the post-removal risk assessment. Please clarify.

8. Worksheet #15-8, page 70 – Reference Limits and Evaluation Table: The RSL Residential Soil Adjusted for Chromium is 290 ug/kg, which is the value for hexavalent chromium; hexavalent chromium is also included in this table. It is recommended that any samples for chromium be speciated and analyzed for both total chromium and hexavalent chromium. These results are used to determine the concentration of trivalent chromium. Due to the significant toxicity of hexavalent chromium and its identification by EPA as an oral carcinogen, the toxicity of hexavalent chromium is significantly higher than trivalent chromium, which is likely to be present in higher concentrations. Unless speciated data are available, all chromium results should be evaluated in the HHRA as hexavalent. Therefore, it is recommended that all chromium samples be speciated.
9. Worksheet # 15-11, page 73 – Reference Limits and Evaluation Table (AVS/SEM Analysis): Please provide information regarding how AVS/SEM data will be interpreted. It should be noted that regardless of the results of the AVS/SEM analysis, in the event that inorganic contaminants are identified at the site at concentrations greater than screening and background values, biological studies may be warranted.
10. Worksheet #17, page 77 – Sampling Design and Rationale: Indicates that 2 soil samples will be collected and analyzed for PCBs in the former debris removal areas on the south side of Highway 200. SAP Worksheet #18 (Sampling Locations and Methods/SOP Requirements Table) indicates that 3 sediment and/or soil samples will be analyzed for PCBs. Please confirm the number of samples analyzed for PCBs.
11. Worksheet # 17, page 77 – Sampling Design and Rationale: Please indicate whether SS009 and SS010 will be evaluated as marine sediment for ecological receptor exposures and surface soil for human health exposures.
12. Worksheet # 18, page 79 – Sampling Locations and Methods/SOP Requirements Table: The sampling SOP number should be provided for each type of sample collected.
13. Worksheet # 18, page 79 – Sampling Locations and Methods/SOP Requirements Table: It may be useful to clearly indicate in the “Analytical Group” column which samples are for the background investigation. In the “Number of Samples” column please indicate the number of site or background-specific samples and the number of duplicates for each group to be sampled.
14. Worksheet # 19, page 81 – Analytical SOP Requirement Table: It is difficult to distinguish which sampling requirements are applicable to which analytical method for metals. This information should be provided separately for each analytical method.
15. Worksheet # 20, page 83 – Field Quality Control Sample Summary Table: Please explain why the total number of samples to be sent to the laboratory is overstated by one sample. Also, EPA does not normally require Trip Blanks for solid samples

submitted for VOA analysis.

16. Worksheet # 28 – Field QC and corrective action information should be added to this worksheet. In addition, the measurement performance criteria should be provided, since this information is more closely related to the rest of the information in this Worksheet than to that in Worksheet # 15.
17. Attachment A, Figure 13, Pesticide/PCB Detections and Exceedances in Sediment: Please include units in site figure.