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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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Head, Environmental Program Branch  
Environmental Division,  
Atlantic Division (LANTDIV), Code 182  
Naval Facilities Engineering Command  
1510 Gilbert Street  
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Re: Naval Station Roosevelt Roads - EPA ID # PR2170027203

- 1) Tow Way Fuel Farm Corrective Measures Study (CMS) Task I Report dated November 30, 1998;
- 2) Navy's December 16, 1998 Response to EPA's comments on the June 30, 1998 CMS Investigation Report for Tow Way Fuel Farm.
- 3) Navy's letter of February 19, 1999 requesting extension for response to EPA's comments on the OU 3/5 RFI Draft Final Report.

Dear Mr. Rakowski:

The United States Environmental Protection Agency (EPA) Region 2 has completed its review of the Navy's November 30, 1998 Task I Report for the Tow Way CMS, and the December 16, 1998 response to EPA's comments on the CMS Investigation Report. Both documents were submitted on your behalf by Baker Environmental, Inc.. EPA has the following comments:

Tow Way Fuel Farm Corrective Measures Study (CMS) - Task I Report

EPA's contractor, TechLaw, Inc., has reviewed the Task I report, which covers Description of Current Conditions [Situation], Establishment of Corrective Action Objectives, and Screening of Corrective Measure Technologies, and had several brief comments, which are given in the enclosed January 18, 1999 Evaluation. While EPA generally agrees with TechLaw's conclusion that the Task I report meets the requirements given in Appendix B (Scope of Work for a CMS) of Module III of the November 1994 RCRA Permit (the Permit), EPA is not yet prepared to approve

the Task I report and the recommended clean-up levels given in Section 3.2 of the report.

In order to approve the Task I report, EPA requires a much more complete discussion of the development of the recommended risk-based clean-up levels for groundwater (i.e., dissolved constituents) and for soils (both surface and subsurface). This must include a complete screening of all possible exposure pathways (including vapor inhalation), and the basis for limiting the risk evaluated exposure pathways to only accidental ingestion and dermal contact for both soil and groundwater. Also, exposures pathways for the plume of phase-separated hydrocarbons (PSH) floating on top of the groundwater must be evaluated.

In addition, there is no discussion of clean-up goals for the PSH plume. Unless the Navy intends that the dissolved constituent clean-up goals for groundwater are to apply to the PSH plume, specific clean-up goals must also be defined for any non-aqueous phase liquids (NAPLs), such as the PSH layer. Such NAPL clean-up goals may be expressed in some manner other than concentration values (e.g., clean-up goals for PSH may be stated in terms of a measured PSH thickness [such as none], to be confirmed by a monitoring program over a period of time). The clean-up goals for the PSH must also include a discussion of its protectiveness in regards to ecological impacts.

In addition, as part of the discussion of the development of the recommended risk-based clean-up levels, EPA requires a through discussion and justification of why the recommended list of clean-up constituents of concern (COCs) should be limited to the four constituents listed in Section 3.2 (benzene, toluene, ethylbenzene, and total xylenes). EPA requests that any hazardous constituent detected at Tow Way Fuel Farm in the surface and/or subsurface soils at concentrations exceeding their respective Region 3 residential risk-based concentration (RBC) level, or in the groundwater at concentrations exceeding either their MCL (pursuant to 40 CFR § 141), or Region 3 tap water RBC, must be screened as a potential COC. The CMI Task I Report must include a discussion of why, or why not, they were determined to be COCs for the purposes of defining clean-up.

Furthermore, as discussed in the enclosed TechLaw evaluation, the Task I report contains no discussion of the trichloroethene (TCE) recently detected at an estimated ("J" qualified) concentration of 2000 ug/l in the groundwater of well 7MW07 (reported in the June 1998 CMS Investigation report). That concentration exceeds the MCL for TCE of 5 ug/l by a factor of 400. MCLs are generally recognized as appropriate Action Levels (screening levels) for further investigation, even if the clean-up standard is not ultimately set at that concentration. Even though a discussion of the possible TCE plume was not included in the Task I report, the Navy's December 16, 1998 response (which is discussed below) to EPA's comments on the CMS Investigation report, included a map showing all recent TCE detections at Tow Way Fuel Farm. Although that map indicates that the TCE plume appears localized to the 7MW07 area, it is not clear where points of negative control (where groundwater was sampled for TCE, but the results were non-detect) are located; therefore, it is not possible to ascertain if the TCE is truly localized in the 7MW07 area. The December 16, 1998 letter indicates that the Navy will subsequently

issue (at an unspecified time) a letter to EPA regarding the need for follow-up activities for the TCE release.

In addition to such a letter, EPA requests that the TCE map (Figure 1 of the December 16, 1998 submittal) be revised to also show all recent (i.e., 1997 and later) TCE non-detect points. Also, several other discrepancies or omissions, which are discussed in the enclosed TechLaw evaluation, must be addressed prior to EPA's final approval of the Task I report.

Within 45 days of your receipt of this letter, please submit a written response and/or an Addendum to the CMS Task I Report addressing all of the above comments and those given in the enclosed TechLaw evaluation of January 18, 1999.

December 16, 1998 Response to EPA's comments on the June 1998 CMS Investigation Report

In addition to our above comments regarding the TCE detection in well 7MW07, EPA has the following comments on the Navy's December 16, 1998 response letter.

For the responses to EPA's comments #2, 3, 4, and 5, and those given in the TechLaw evaluation included with EPA's October 2, 1998 letter, the Navy indicates they accept EPA's/TechLaw's comments; yet instead of supplying the appropriately revised text or figure, the letter contains numerous statements to the effect that the revised text or figure, etc., will be provided either with the "final submission" or "next submittal". EPA requests that within 45 days of your receipt of this letter, the Navy submit an addendum to the June 1998 CMS Investigation report, which includes all revised text or figures, etc., as indicated in Baker's December 16, 1998 letter. Such an addendum may be combined with the Addendum for the Task I report discussed above.

Navy's letter of February 19, 1999 requesting extension for response to EPA's comments on the OU 3/5 Draft Final RFI Report

As requested in Mr. Christopher Penny's letter of February 19, 1999, EPA approves the extension until March 22, 1999 for submission of your response to EPA's November 24, 1998 comments on the OU 3 & 5 Draft Final RFI Report.

Please telephone Mr. Tim Gordon of my staff at (212) 637- 4167 if you have any questions regarding any of the above.

Sincerely yours,

Nicoletta DiForte  
Chief, Caribbean Section  
RCRA Programs Branch

## Enclosure:

cc: Mr. Israel Torres, PREQB, with encl.  
Ms. Madeline Rivera, NAVSTA Roosevelt Roads, with encl.  
Mr. Christopher Penny, LANTDIV, with encl.  
Ms. Luz Muriel-Diaz, PREQB, with encl.

bcc: Carl A. Soderberg, 2CEPD, with encl.  
John Gorman, 2DECA, w/o encl.  
Tim Gordon, 2DEPP- RAB, with encl.  
RCRA File Room, with encl.

**Navy's Draft Responses  
To  
TechLaws Evaluation of Draft RCRA Facility Investigation Report  
Operable Unit 3/5**

**TECHLAW COMMENTS**

**General Comments**

**Comment 1**

The issue of analytical data and data validation has been managed previously in your formal comments by indicating that the review of the material is performed by the Edison Lab. Based on this premise, the Navy withholds any response until directed otherwise in EPA's formal comment letter.

**Comment 2**

For your information, rejected data was not used in the statistical analysis.

**Comment 3**

**First Bullet** - Salinity and aquifer data will be obtained from the additional investigations for SWMU 9 to determine or demonstrate that the shallow aquifer is not a potable water source.

**Second and Third Bullet** - The second two bullets of Comment 3 appear to assume that a deed restriction and long term groundwater monitoring program will be sufficient for the site. The Navy intends to impose institutional controls ( i.e. property use restrictions, etc.) for SWMU's 1 and 2. The Navy did not imply that a Long-Term groundwater-monitoring program would be part of the institutional controls. It is assumed that TechLaw is viewing this landfill as if it were a typical Base landfill and that a long term groundwater monitoring program would be required as standard procedures for landfill closures. Based on the investigation information presented in the RFI Report, there is strong evidence that these SWMU's operated more as a disposal area rather than a conventional type landfill. The data also reveals that there is minimum risk to future residents utilizing groundwater. Based on the fact there is only minimum risk and groundwater is not utilized as a drinking water source on the base, it does not appear that a LTM of groundwater is warranted when institutional controls (property use restrictions) will be imposed on the site.

As agreed to earlier, the Navy will prepare a master document describing the institutional controls imposed on the proposed sites, the manner in which the Navy will record these institutional controls, and a letter signed by the Base Commander, addressed to EPA, committing the Navy to these institutional controls.

**Comment 4**

Offshore (harborside of the mangroves) sediments were sampled when the area was IR Site 14. At that time, semivolatiles indicative of spilled fuel products were found at low but significant levels. These compounds were attributed to the 100,000 + gallon spill from the Tow Way. This

information can be presented in the Navy's response to EPA's formal comments.

The Navy proposes that a meeting be held between EPA and the Navy to discuss the framework of work involved for the ecological investigations and risk assessment before finalization of plans for any additional work.

## **PAGE SPECIFIC COMMENTS**

### **Page 3-8, Section 3.4.1.1, Paragraph 2**

A work plan for the recharacterization of the Building 38 interior was submitted on March 31, 1998. At this time, a determination of the need for additional work at the building is pending EPA TSCA group review of the clarified data, which was provided at the June JIG meeting.

### **Page 5-1, Section 5.0, Paragraph 1**

#### **SWMU1 - Bulleted Comments**

##### **First Bullet**

Existing information from historical photographs and records indicates that the SWMU was more or less utilized as an open dump rather than a structured landfill operation. The results of the investigations indicated that there was only one area within the SWMU that had evidence of trench filling. This area was subjected to additional drilling and sampling during the performance of the RFI and was completed in accordance with the approved RFI work plans. In the other areas within the SWMU, it appears that trucks simply backed down the access road and dumped their loads on the ground surface. This assumption is based on visual observations of the area during the RFI and supported by historical records. This theory among others would explain why the disposal of past waste appears random and the thickness of waste material is inconsistent.

This information was known before preparation of the RFI work plans and was used to assist in developing the technical approach of the investigation. The scope of investigations were reviewed and approved by EPA. Efforts were made to fully explore the areas where trench filling was indicated and a sampling program was conducted to characterize the general area of the landfill.

The Navy's concern is that TechLaws comments are general in nature and appear to follow standard guidance for typical landfill investigations and remedial design. A majority of these comments or concerns should have been presented during their review of the Draft RFI Work Plan so that they would have been addressed prior to commencing the investigation and report. Nevertheless, soil and groundwater data to date have indicated that unacceptable risk to future onsite residents and current on-site maintenance workers. Because the risks are minimal, the Navy proposes to impose institutional controls as a final remedy. These controls would prohibit intrusive work, building construction, and groundwater use restrictions. Based on that premise and with economic considerations in mind, additional characterization is not warranted since both of these sites have undergone two extensive investigations, which revealed the same general conditions.

The Navy desires to come to closure on these issues and these sites and move ahead with the

overall corrective action program. It would appear that an overall "risk management" approach would be more mutually profitable for this site (and others at the Base). The Navy anticipates that you will take these concerns into account during your review of the document.

### **Second Bullet**

Historical records and the results of the investigation suggest that the landfill was never closed in accordance with regulatory procedures. No evidence of a typical landfill cover exists. However, samples of surface soils covering the area at represented locations across the site were taken and the analyses were provided in the report.

### **Fourth Bullet**

As indicated previously, this SWMU is not a landfill in the normal sense but more a random open dump with truckload piles of material generally occurring throughout. Based on this, there is essentially no "vertical extent" to establish. The general extent of the vertical elevation of the landfill has been assessed visually. The Navy is concerned on how much more effort will be required for this site at this stage of the process, given that only minimum human health risks are posed by the site and that institutional controls will most likely be the remedy.

### **Fifth Bullet**

Groundwater monitoring has been performed at the down gradient perimeter of the site and background locations have been established. The direction of flow is to Ensenada Honda, which is the uppermost aquifers discharge point. Since the disposal operations at the landfill ended a relatively long time ago (25 years plus) it can reasonably be assumed that the groundwater is in equilibrium with the soils and the surface water. At this juncture, the additional work requested by Techlaw appears unwarranted considering the minimal risks to human health posed by the site?

### **Sixth Bullet**

This is a very generic comment. It is not clear as to the type of media that has been omitted from the program to date?

### **Seventh Bullet**

Up and down gradient wells have been installed around the landfill area. These have been sampled and subjected to a rigorous battery of analytical suites. To what further extent does EPA envision the need to provide additional characterization of groundwater?

### **Eighth Bullet**

This comment also lacks specificity. Samples of sediments and surface water were taken at the down gradient limit of the landfill which coincides with the edge of the water.

### **SWMU 2**

SWMU 2 is a similar landfill to SWMU 1. The one area in which subsurface disposal was indicated in a review of historical air photos, was investigated in accordance with the approved workplans. The remainder of the landfill is an open dump, which is coverless. Techlaw provided essentially the same comments for SWMU 2 as those for SWMU 1. As before, the Navy has serious concerns regarding the extent of additional investigations at this stage of this

process.

## **SWMU 11/45**

### **First Bullet**

How much more, if any, characterization of groundwater will be needed considering that all sources of contamination have been removed. The risks posed to human health are minimal and it is proposed that institutional controls will be imposed at this facility. Additional investigations may not be very cost effective when considering the cost/benefit ratio when the outcome is basically pre-designed.

### **Second Bullet**

There is only one detection of mercury (at 2.6 ug/l) above the federal MCL. Surrounding sampling points do not confirm its widespread presence. Soils have been remediated in the area and at this juncture, additional investigations do not appear warranted.

### **Third Bullet**

An ICM Closeout report for SWMU 45 PCB soil removal "Final, Closeout Report for Interim Remedial Action of PCB Contaminated Soils, Sites 15 and 16 at the Naval Station, Roosevelt Roads, Puerto Rico." OHM Remediation Services Corporation and Metcaf & Eddy, Inc., May 1995 (Note: Site 16 includes the soils in the vicinity of Building 38) contained results of confirmatory sampling performed after site clean up. The final report had been submitted to your office upon clarifying issues presented in an EPA comment letter of the Closeout Report. EPA accepted this report as final in 1997. The Navy assumes that this comment was generated without knowledge of the close out report.

### **Fourth Bullet**

Surface water and sediments (the only two media present at the tunnel's terminus) have been sampled. The most recent sampling event included extensive sediment sampling and sampling of soils along the full length of the tunnel. It is not clear as to why this comment was generated and would appear to ignore those efforts and is asking, in essence, for another program similar to the one just completed.

## **SECTION 6:**

Page 6-9, Section 6.1.2.1.....

It has been an accepted practice, by Region II, on all past NSRR risk assessments to evaluate and retain both total and dissolved inorganics as groundwater COPCs; however, in the Exposure Assessment, the tap water pathways for total inorganics are logically eliminated since the amount of sedimentation from turbidity observed in the samples is never representative of conditions at the tap. It is more logical to evaluate exposures to total inorganics in groundwater under, e.g., construction worker scenarios, where shallow groundwater may be encountered during excavation. This logic coincides with the Navy's intention of imposing institutional controls (i.e. groundwater use restrictions, property use restrictions, etc) at these SWMU sites.

Page 6-17, Section 6.1.2.3, Paragraphs 3 & 4

Although it is normally expected for total inorganic concentrations to exceed corresponding dissolved concentrations, and without explanation, the opposite does occur a small percentage of the time. However, there are three possible explanations that are being offered for the discrepancy cited in regards to the mercury concentrations, these would be: 1) incomplete acid digestion of the unfiltered sample during sample preparation; 2) mercury contamination present in either the glassware used for acid digestion of the dissolved sample (as a result of improper washing techniques; and/or 3) mercury contamination may have been present within the analyzer during analysis of the dissolved fraction. Whatever the reason, it should be noted though that the results of data validation indicate the mercury data are still useable.

Page 6-28, Section 6.2.3, Paragraph 1; Page 6-46.....

The quality of groundwater at Roosevelt Roads has been discussed previously. It is the Navy's intent to characterize the groundwater for salinity at other SWMU's in upcoming investigations and analyze the data to determine the quality of groundwater for potable use in the local area.

Page 6-35

The PEF value of  $1.32 \times 10^9$  m<sup>3</sup>/kg is an updated default value derived in USEPA's Soil Screening Guidance (1996).

Page 6-36, Paragraph 2, and Appendix M

The use of the nonsteady state model for estimating dermal absorption is not recommended for use in this risk assessment. This is because it is overly conservative since it is based on a mono-phasic approach that assumes absorption solely by skin lipids and ignores movement across the proteinaceous stratum corneum layer. This often times produces risks that are equivalent to or greater than those estimated for the ingestion pathway, which is counterintuitive for many chemicals (e.g., some semivolatiles) for which this has been observed. In addition, the steady-state model has been used and accepted consistently by USEPA on past NSRR risk assessments. Introduction of the nonsteady state model into the dermal intake calculations would not only be unrealistically conservative, but would be inconsistent with past risk assessments conducted for NSRR.

Page 6-46, Paragraphs 1 & 2

With regard to the question of total lead concentrations exerting unacceptable risks, please see the previous response to the comment on Page 6-9, Section 6.1.2.1..... . Although lead concentrations exceeded the residential soil screening level (please see Table 6-4) for SWMU 1, there are no human health sediment values established for a more appropriate comparison with sample data to determine if actual risks exist. In addition, there are currently no lead models available to evaluate sediment exposures to humans. The discussion of the uncertainties associated with potential risks to lead in sediment will be expanded in Section 6.5.6 of the revised report.

Page 6-47, Paragraphs 1 & 2

The discussion of the lack of available toxicity criteria established for isodrin will also be addressed as an uncertainty in Section 6.5.6 in the revised report.

Page 6-48, Paragraphs 1 & 2

The exceedence of the Federal action level (please note that there is no MCL established for lead) by total lead levels is inappropriate in the cited paragraphs for the reasons cited in the previous response to the comment made on Page 6-9, Section 6.1.2.1..... .

Page 6-53, Section 6.5.6, Paragraph 6

The text in Section 6.5.6 will be expanded in the revised report to address this comment, and per the previous responses for the comments made on pages 6-46 and 6-47.

Tables 6-4, 6-5, and 6-12

The residential soil RBC values will be corrected as noted for PeCDF, chrysene and phenanthrene. These corrections will have no change in the outcome of the COPC selection and the risk assessment.

Table 6-7

Isodrin will be retained as a COPC for qualitative evaluation in Section 6.5.6 as discussed previously in the response to the comment made on page 6-47. This will have no affect on the outcome of the risk assessment.

Table 6-11

Please refer to the response previously discussed for the comment made on page 6-17.

Tables 6-14 and 6-16 and Appendix M

The inhalation rate will be changed in the revised report as noted. It should be noted that this modification is not significant enough to change the outcome of the risk assessment results.

Appropriate corrections will be made in the revised report to Appendix F, Appendix H, SWMU 1, Appendix H, SWMU 11/45

The issues identified in the recommendation section have been addressed previously

**Page 7-5, Section 7.2.3**

This comment requests "Addenda to this report... which address the cumulative impacts of exposure at both SWMUs 11 and 45 to current and future receptors." Given the discussion of numerous points regarding these SWMUs in responses to individual comments, can this comment be clarified to identify particular concerns.

**Page 7-7, Sections 7.3.1 & 7.3.2**

As previously discussed, this comment presupposes a remedy. Is this the intent?

**Page 7-8, Section 7.3.3, Paragraph 5**

It is not clear as to why additional information would be needed. A rigorous sampling program was conducted which indicated no contamination at a distance of 50 feet from the tunnel. Given the small area of contamination (immediately around the tunnel) and the fact that the source has been eliminated, it would seem unnecessary to perform additional investigations.

**EQB COMMENTS**

**General Comment to Letter**

A work plan for performing the RFI at SWMUs 1 and 2 was approved in 1995. In the fall of 1996, initial site characterization work under the approved plans was begun. As the data from these efforts was being evaluated, it became apparent that two wells for SWMU 1 (which were a part of the work plan) had not been installed as planned. This was documented to EPA in a letter provided in April 1997.

It was agreed that the Navy would install the two wells that were inadvertently omitted during the first field investigation prior to submitting any report for OU 3/5. It was further agreed that the wells would be installed in conjunction with field efforts for the additional work at OUs 1, 6 and 7. This work was completed in the fall of 1997.

The OU 3/5 RFI report contains the results of all the investigations performed in accordance with the approved work plans. There was only two "phases" of work in terms of the installation of the complete monitoring well network in two separate installation events. In no way did the results of what the report refers to as "Phase I" drive or determine the scope of the reports "Phase II". There was one complete RFI performed in two separate field events.

**Background Samples**

The background sampling locations have been approved by EPA since they were used in the Revised Draft OU2 RFI Report (SWMU 7/8) which has received EPA approval. They were also tacitly approved in the OU 1, 6 and 7 RFI report and subsequent addenda.

**Comments**

**First Bullet**

The presence of a dioxin in the background data set simply indicates their ubiquitous nature in industrialized portions of the world.

**Second Bullet**

The determination of background concentrations for metals in soil and groundwater was largely the purpose of going to the expense of installing the background wells.

**Third Bullet**

The Navy can see no good technical reason to prove background is background by the taking and analyzing additional samples from the remote location especially given the EQB's apparent pronounced disinclination to accept any background as representative.

**Fourth Bullet**

The purpose of background is to establish a baseline of ambient environmental conditions in environmental media of concern. Background is not some arbitrary standard from some pristine setting totally unaffected by man but is based on site-specific conditions. The purpose of background sampling is not to provide comparisons of data to establish that a SWMU is untouched by man but to attain an understanding of what effect the waste management activities at the SWMU have had on the site and what, if any, degradation of environmental media has occurred when compared to similar areas which have not been subjected to waste management activities.

All sites, whether they are SWMUs or not, are equally affected by anthropomorphic contamination from multiple sources. Specifically, runoff from parking lots and roadways often contain volatile and semi-volatile organics arising from petroleum based paving materials and emissions from vehicles. These chemicals commonly occur in soils and drainage ditch sediments near these features. The historic and long-term use of pesticides and herbicides, especially in a tropical environment, will often produce low levels of residual chemicals in the soil and sometimes groundwater. Finally, airborne contaminants (dioxin being a prime example) can migrate onto a facility from offsite sources and eventually show up randomly in site soils.

In all the cases discussed above, the important consideration is establishing ambient site conditions. All the factors, which may affect the site, must be taken into consideration. This is the key to constructing a background database that is representative of ambient conditions, unaffected by waste management activities.

Based on the forgoing information, the Navy contends that it is perfectly reasonable and technically supportable to use background data for organics.

#### **Fifth Bullet**

The presence of antimony, cadmium, mercury, selenium, silvers and thalliums are not present in the background as a result of "man's impact". These are naturally occurring elements whose presence in site media is of no surprise especially considering the igneous nature of the parent rock.

Attachment 1 to this letter provides some brief information concerning the occurrence of the "trace elements" in soil and groundwater. As can be seen, all the elements attributed to "man's impact" in the comments are commonly occurring. Of special interest is the quote from the McGraw Hill volume regarding the occurrence of selenium in Puerto Rico soils.

Based on the above, the Navy still contends that the background data is of particular importance in considering inorganics constituents and to what extent they may be site related.

#### **SWMU 1 - Former Army Cremator Disposal Site**

##### **Comments**

A review of Attachment 1 indicates that essentially all of the inorganic elements cited in the comments commonly occur in natural soils and groundwater.

#### **SWMU 2 - Langley Drive Disposal Site**

##### **Soil and Subsurface Samples**

### **First Paragraph**

A full RFI was performed at SWMU 2. All work proposed for the full RFI in the EPA approved workplan was completed.

### **Comments**

#### **Third Bullet**

The stated information in the comment does not necessarily support the conclusion reached.

### **Quality Assurance and Quality Control Samples**

### **Comments**

#### **First Bullet**

Chloroform, a common by product of chlorination of water, appeared in the Roosevelt Roads potable water sample taken previously. Bis-2-ethylhexylphthalate is a plasticizer commonly found in laboratory and sample containers. Its low level presence in QA/QC samples is usually ascribed to being a "laboratory artifact" especially considering the site was not used for the manufacture of plastics.

#### **Second Bullet**

The "contamination" seen in the cited QA/QC samples is minor. All decontamination activities were performed in proper areas and in accordance with the EPA approved RFI workplan.

#### **Final Bullet**

The duplicates and MS/MSDs were collected during the conduct of the RFI in accordance with the approved workplan. All results of these samples were discussed in the data validation reports. The analytical data and data validation reports were provided to EPA's Edison, New Jersey laboratory for their review.

The Navy appreciates this opportunity to provide its opinions and thoughts on the preliminary comments regarding the OU3/5 Draft RFI report. Please do not hesitate to call me at (757) 322-4815, if you have any questions or if the Navy can provide any additional information that would assist you in your review of the document.

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