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May 25, 1999

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

Attn: Mr. Timothy Gordon
RCRA Caribbean Branch

Re: Contract No. N62470-D-89-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0277
RCRA Corrective Action
Naval Station Roosevelt Roads
Issues Related to "Background"

Dear Mr. Gordon:

The issue of background, what it contains and in what concentration, has been a recurring theme at Roosevelt Roads throughout the RCRA Corrective Action program. Most recently, the subject was raised in the EPA February 12, 1999 letter which addressed, among other things, SWMU 26 and the presence of inorganics in the site and background analytical data. The Navy indicated that it would research the availability of information related to background in Puerto Rico. This letter provides the result of the Navy's efforts.

The following steps have been taken in efforts to establish "background" related to Roosevelt Roads:

- Four monitoring wells were installed early in the corrective action program at the station perimeter fence (near former Gate 2) to provide station specific background for soil and groundwater.
- Site-specific background was developed for SWMU 26 through sampling performed outside the boundaries of the SWMU.
- Extensive research using the internet was performed by Baker to find information on background in Puerto Rico.
- A professional computer research firm (NERAC, Inc.) was retained to provide references related to background soil and groundwater conditions in Puerto Rico, and
- A Baker environmental scientist, with extensive experience in Puerto Rico, was sent to the island to personally research background.

In this process, a large amount of information has been reviewed. The results of the most recent effort (the trip to Puerto Rico) are attached as a bibliography. Previous efforts have been summarized in various reports and response to comments that have been provided to the EPA during the corrective action program.

The results of these efforts have largely been negative, i.e., there is very little information publically available. Nothing specific regarding the chemical composition of soils or groundwater in Puerto Rico appears to be available. In fact, there appear to be a number of industrial facilities on the island subject to regulatory action



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(either commonwealth or federal) at which background issues continue to delay final disposition of problem areas. This would appear to indicate that the lack of specific information found by the Navy does not reflect an ineffectual effort by the Navy to establish background but is more indicative of a lack of available information.

The only area of potential information that has not been explored is the regulated community. Most investigations performed under RCRA, CERCLA or other regulatory program contain some efforts to establish background. Based on this, it is likely that a significant amount of data regarding background has been developed but has not been gathered or shared. The Navy would be willing to combine this data into a useable format if it were made available by the EPA and EQB. Therefore, the Navy requests that EPA and EQB review their files and provide any pertinent information. Once this is complete, the resulting database may be valuable to both the regulatory agencies and the regulated community.

Beyond the effort described above, the Navy does not intend to expend additional resources in efforts to unilaterally establish a background for soils and groundwater in Puerto Rico. There are presently no sites in the Roosevelt Roads corrective action program at which background issues are delaying progress. Based on this, stopping efforts to establish background at this time will not negatively impact the corrective action program.

Please do not hesitate to call me at (412) 269-2065 or Mr. Christopher T. Penny, the Navy's Technical Representative, at (757) 322-4815 if you have any questions or desire to discuss any of the points addressed in this letter. The Navy looks forward to working with the EPA and EQB in the future when the appropriate information becomes available.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Thomas C. Fuller
Activity Coordinator

TCF/lp

cc: Ms. Luz A. Muriel Diaz - PREQB
Ms. Madeline Rivera - NSRR
Mr. Christopher T. Penny, LANTDIV
Mr. John Tomik, CH2M Hill