

NAPR - SWMU 62 Phase I RFI comments.txt

From: Gordon.Timothy@epamail.epa.gov
Sent: Friday, August 21, 2009 10:26 AM
To: mark.e.davidson@navy.mil; Kimes, Mark
Cc: wilmarivera@jca.gobierno.pr; GloriaToro@jca.gobierno.pr
Subject: NAPR - SWMU 62 Phase I RFI comments
Attachments: NAPR_TechLaw SWMU 62_Phase I RFI Review_09 March 16.doc

Mark & Mark,

Attached is TechLaw's March 16, 2009 technical review comments on the Feb 6, 2009 Draft Phase I RFI report for SWMU 62. Apparently, we never sent these to you, or otherwise commented or approved the SWMU 62 report. Rather than my now sending you a formal letter transmitting the attached, since there are comments which need to be addressed, I propose that you address the attached comments, and then you formally (via letter) submit your responses and any needed revisions to the draft Phase I RFI report. After receipt of the responses and necessary revisions to the SWMU 62 Phase I Report, EPA will review those and then issue a formal letter either commenting on or approving them. I would also at that time request PREB to do the same.

Please advise if you concur on this approach and the due date for when you would formally submit the responses and necessary revisions to the SWMU 62 Phase I Report,

(See attached file: NAPR_TechLaw SWMU 62_Phase I RFI Review_09 March 16.doc)

Call or Email me if any questions. Thanks,

Timothy R. Gordon
U. S. Environmental Protection Agency
RCRA Programs Branch
Resource Conservation and Special Projects Section 290 Broadway, 22nd. Floor
New York, NY 10007-1866 Phone (212) 637-4167

**TECHNICAL REVIEW OF THE
DRAFT PHASE I RCRA FACILITY INVESTIGATION REPORT
SWMU 62 – FORMER BUNDY DISPOSAL AREA
DATED FEBRUARY 6, 2009**

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID NO. PR2170027203**

Submitted to:

**U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866**

Submitted by:

**TechLaw, Inc.
One Penn Plaza, Suite 2509
New York, NY 10119**

EPA Task Order No.	002
Contract No.	EP-W-07-018
TechLaw TOM	Michael Smith
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Telephone No.	212-637-4167

March 16, 2009

**TECHNICAL REVIEW OF THE
DRAFT PHASE I RCRA FACILITY INVESTIGATION REPORT
SWMU 62 – FORMER BUNDY DISPOSAL AREA
DATED FEBRUARY 6, 2009**

The following technical comments were generated based on a review of the *Draft Phase I RCRA Facility Investigation Report: SWMU 62 – Former Bundy Disposal Area* (Draft Phase I RFI Report), Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico dated February 6, 2009.

TECHNICAL REVIEW COMMENTS

1. It does not appear that the data collected as part of the Phase I RFI investigation have been accurately presented, summarized, and interpreted throughout the text and tables of the Draft Phase I RFI Report. Specific examples noted during the review are delineated below:
 - Based on a review of Table 6-2, Summary of Detected Laboratory Results – Subsurface Soil, it appears that a few constituents were detected at concentrations exceeding one or more of the screening levels presented in Table 6-2, but were not marked as such. For example, it appears that the concentration of beryllium detected in the soil sample collected from 62SB06-03 exceeded the NAPR basewide background concentration, however it was not identified as an exceedance. Please review and revise Table 6-2 in its entirety to ensure that all exceedances are properly identified.
 - It does not appear that the collected data have been accurately summarized in Sections 6.2, Surface Soil, and 6.3, Subsurface Soil. Furthermore, it is unclear why references are made to certain screening level exceedances and not others. For example, Section 6.2 states that detected concentrations of arsenic at three locations exceed the background screening level; however, no statement is made regarding the arsenic detections which also exceeded the Regional Screening Levels (RSLs) for residential and industrial soil. No discussion regarding the beryllium exceedances noted in Table 6-2 is included in Section 6.3. Section 6.3 indicates that detected cobalt concentrations exceeded the RSL for residential soil, but no statement is made regarding the exceedance of ecological surface soil screening values at 62SB06-01. Please revise Sections 6.2 and 6.3 to include complete and accurate discussions of the collected data and associated exceedances identified as part of the Phase I RFI investigation.
 - According to Section 7.1, Conclusions: "...a few samples have resulted in elevated concentrations above ecological surface soil and NAPR basewide background screening values namely barium (62SB04-00 and 62SB07-00) and tin (62SB09-00) in the surface soil and barium and copper (62SB06-01) in the subsurface soil." This statement appears to be inaccurate. According to Table 6-2, the concentration of copper detected in the sample collected from 62SB06-01 did not exceed the NAPR basewide background screening value. Please revise Section 7.1 to eliminate this

discrepancy between the text and Table 6-2.

- Section 7.1 notes that arsenic concentrations were detected above RSLs for residential soil and NAPR basewide background screening levels at borings 62SB06-00 and 62SB09-00. According to Table 6-1, arsenic was also detected above both criteria in sample 62SB08-00D. In fact, arsenic was detected above the RSL for industrial soil at all three locations. For completeness and transparency in the interpretation of the collected data, please revise Section 7.1 to address all known exceedances of arsenic and comment on their significance with respect to the conclusions reached in the Phase I RFI investigation.
 - Section 7.2, Recommendations, states “The full RFI investigation should focus around Phase I RFI sample locations 62SB04, 62SB06, 62SB07, and 62SB09.” Given that Sections 6.2, 6.3, and 7.2 present only a limited and, at times, inaccurate discussion of the collected data and its significance, the basis for focusing the full RFI investigation on these four sampling locations is unclear. Please provide a rationale for this conclusion, including a discussion of why these locations were selected and not others.
2. According to Section 6.2, “Based on the exceedances of background and regulatory screening concentrations in the soil, it appears that metals contamination (primarily arsenic, barium, and tin) may have occurred in the surface soil at SWMU 62 due to human activities on site.” It is unclear how it was concluded that the three aforementioned metals are the primary contaminants when other detected metals concentrations, such as those for vanadium and cobalt, also exceeded regulatory screening concentrations. Please provide the basis for this conclusion.
 3. According to the Revised Final Phase I RCRA Facility Investigation Work Plan, dated April 17, 2008, “two subsurface soil samples [one to three feet bgs and just above the water table interface] will be collected from each boring location, if site topography and terrain will allow (see SOP F102 in Baker, 1995).” According to Table 4-1 of the Draft Phase I RFI Report, no soil samples were collected at one to three feet bgs from borings 62SB01, 62SB04, and 62SB08. In addition, according to Section 5.2.2, groundwater was not encountered during the installation of the borings, and no indication of the depth of the water table interface was made on the soil boring logs. As a result, the rationale for selecting the sampling depth at all borings appears to be unclear. Please discuss the rationale behind the sampling depth selections and provide a justification for the noted deviations from the Work Plan.
 4. According to Table 6-1, Summary of Detected Laboratory Results – Surface Soil, the laboratory reporting limits for tin are listed at concentrations above the selected ecological surface soil screening value and the NAPR basewide background level. Therefore, it is unclear whether tin is present at SWMU 62 above the screening levels. Please include a discussion as to how this issue will be addressed.

Fw NAPR - SWMU 62 Phase I RFI comments.txt

From: Gordon.Timothy@epamail.epa.gov
Sent: Friday, August 21, 2009 11:46 AM
To: mark.e.davidson@navy.mil; Kimes, Mark
Cc: GloriaToro@jca.gobierno.pr; Wilmarivera@jca.gobierno.pr
Subject: Fw: NAPR - SWMU 62 Phase I RFI comments
Attachments: NAPRPhaseIRFIReportSWMU 62-Emailversion.doc

Mark & Mark,

Since I never sent you comments on SWMU 62 (refer to my earlier Email today), please address not only the TechLaw March 16 technical review comments sent earlier today, but also PREQB's March 4, 2009 comments, which are attached below.

As requested in my earlier Email today, please advise a target due date for the Navy submitting responses and revisions to the SWMU 62 Phase I RFI report to address both TechLaw's March 16 technical review comments sent earlier today, and PREQB's March 4, 2009 comments attached below.

Thanks,
Timothy R. Gordon
U. S. Environmental Protection Agency
RCRA Programs Branch
Resource Conservation and Special Projects Section 290 Broadway, 22nd. Floor
New York, NY 10007-1866 Phone (212) 637-4167
----- Forwarded by Timothy Gordon/R2/USEPA/US on 08/21/2009 11:36 AM

GloriaToro@jca.gobierno.pr

08/21/2009 11:27 AM

Timothy Gordon/R2/USEPA/US@EPA
To
cc

Subject
Re: NAPR - SWMU 62 Phase I RFI comments

Tim:
Did you forward EQB's comments on SWMU 62 to the Navy/Baker? I send you an e-mail with the comments on March 2009. I am attaching the comments to this e-mail, just in case you did not received.
My new phone number is 787-833-1188 or 787-450-1068

Cordially, Gloria

Gloria M. Toro-Agrait
Environmental Permits Officer II
Hazardous Wastes Permit Division
Land Pollution Control Area
Puerto Rico Environmental Quality Board

Fw NAPR - SWMU 62 Phase I RFI comments.txt

Tel: 787-767-8181 X 3586
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-----Gordon. Timothy@epamail.epa.gov wrote: -----

To: mark.e.davidson@navy.mil, mkimes@mbakercorp.com
From: Gordon. Timothy@epamail.epa.gov
Date: 08/21/2009 10:25AM
cc: wilmerivera@jca.gobierno.pr, Gloriatoro@jca.gobierno.pr
Subject: NAPR - SWMU 62 Phase I RFI comments

Mark & Mark,

Attached is TechLaw's March 16, 2009 technical review comments on the Feb 6, 2009 Draft Phase I RFI report for SWMU 62. Apparently, we never sent these to you, or otherwise commented or approved the SWMU 62 report. Rather than my now sending you a formal letter transmitting the attached, since there are comments which need to be addressed, I propose that you address the attached comments, and then you formally (via letter) submit your responses and any needed revisions to the draft Phase I RFI report. After receipt of the responses and necessary revisions to the SWMU 62 Phase I Report, EPA will review those and then issue a formal letter either commenting on or approving them. I would also at that time request PREB to do the same.

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Call or Email me if any questions. Thanks,

Timothy R. Gordon
U. S. Environmental Protection Agency
RCRA Programs Branch
Resource Conservation and Special Projects Section 290 Broadway, 22nd. Floor
New York, NY 10007-1866 Phone (212) 637-4167(See attached file:
NAPRPhaseI RFI ReportSWMU
62-Email version.doc)



COMMONWEALTH OF PUERTO RICO
OFFICE OF THE GOVERNOR
ENVIRONMENTAL QUALITY BOARD

Land Pollution Control Area

March 4, 2009

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

**RE: REVIEW DRAFT PHASE I RCRA FACILITY INVESTIGATION
(RFI) REPORT SWMU 62 – FORMER BUNDY DISPOSAL AREA
NAVAL ACTIVITY PUERTO RICO (NAPR)
CEIBA, PR PR2170027203**

Dear Mr. Gordon:

The Hazardous Wastes Permits Division (HWPD) of the Land Pollution Control Area has finished the review of the above-mentioned document. This document have been prepared to report the findings of the May/June 2008 Phase I RFI field investigation for SWMU 62 and serves as the basis for determining the nature of impacts from the potential release of hazardous constituents at the site.

Although, EQB concurred with the conclusions and recommendations of the report, there are several comments regarding it content that should be addressed before requiring a Full RFI Work Plan for SWMU 62. Enclosed you will find comments to the reviewed report.

If you have any additional comment or question please feel free to contact Gloria M. Toro Agrait of my staff at (787) 767-8181 extension 3586.

Cordially,

Brenda L. Rodríguez Soto
Supervisor
Hazardous Wastes Permit Division

cc: Ariel Iglesias Portalatín
Wilmarie Rivera, Federal Facilities Coordinator

**Review Draft Phase I RCRA Facility Investigation Report,
SWMU 62, Naval Activity Puerto Rico, EPA I.D. No. PR2170027203,
February 6, 2009**

- 1) The first sentence of section 2.2 located SWMU 62 at the southeastern portion of the base and referred to Figure 2-2. According to the mentioned figure the “Former Bundy Disposal Area” is really located at the southwestern portion of the base. Please revise the text and correct as appropriate.
- 2) Some of the QA/QC samples associated with SWMU 62 were share with other SWMUs that were investigated during the same period of time. Please provide more detailed information regarding the sample identification and preparation. For example, it is not clear how a Field Blank, collected on May 2, 2008 could be related to samples taken on May 31, 2008 and June 1, 2008. For future activities the frequency of the QA/QC samples should be clearly noted along with how the quality samples will be taken and share for concurrent site activities.
- 3) Using the provided web address at the References on Section 8.0 the Regional Screening Levels Table could not be accessed.
- 4) Preliminary Risk Calculations for surface soils are not being discussed on Section 6.2. It appears that a general discussion for all the detected concentrations (surface and subsurface soils) were included as part of section 6.3. This type of organization leads to confusion, please clarify if the discussion presented is intended for both sections or only for section 6.3. If it is a general discussion, it should be presented in a manner that include both sections or discuss the calculations of each section in a separate way.
- 5) On the fourth paragraph of Section 6.2, at page 6-3, two soil sampling locations were identified as been from SWMU 68. Please revise and correct.
- 6) On Section 6.3, the fifth paragraph discusses the metals that exceeded screening levels. This discussion included the soil sample identification but omits the depth interval from were the samples came from. Please revise and correct in order to include the complete sample identification number.

- 7) Baker, on behalf of NAPR submitted on February 26, 2009 a table with the Revised Human Health Risk Assessment Summary of Receptors and Exposure Parameters. The preliminary Human Health Risk Calculations presented in Appendix D should be revised to reflect the changes according to the new table.
- 8) The document makes reference to NAPR base wide background surface soil screening value (upper limit of the means concentrations [mean plus two standards deviation]) for Subsurface Soil Background Fine Sand/Silt Table 3-5 (Baker, 2008). The referenced document is not available at the NAPR Project Team Website for comparison. The only document available (which is the same document that is available at PREQB files) is dated October 17, 2006, please made available the most recent base wide background summary.
- 9) The report did not mentioned management of investigation derived waste (IDW). The approved RFI Work Plan revised on December 20, 2007 and made final on April 17, 2008 did mentioned, on Section 3.3.2 at page 3-4 below other field activities, the procedures for the management of IDW. The report should included information regarding IDW, if any were generated.