



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

FEB 18 2010

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Mark E. Davidson  
US Navy  
BRAC PMO SE  
4130 Faber Place Drive  
Suite 202  
North Charleston, SC 29405

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,  
EPA I.D. Number PRD2170027203,

- 1) SWMU 56 (Hanger 200 Apron Area) – Functional Assessment and Supplemental Sediment Sampling Report, dated December 3, 2009
- 2) SWMU 56/Site 56A (Hanger 200 Apron/Building 207 Area) – Source Area Investigation Report, dated January 13, 2010
- 3) SWMU 61 (Former Bundy Vehicle Maintenance Facility) – Request for Additional Sampling, dated January 8, 2010
- 4) SWMU 62 (Former Bundy Disposal Area) – Revised Final Phase I RFI Report, dated January 13, 2010
- 5) AOC F – Navy's Responses to EPA's September 29 and October 2, 2009 Comments on Draft – Year 7 Annual Report, dated December 30, 2009

Dear Mr. Davidson:

This letter is addressed to you as the Navy's designated project coordinator pursuant to the January 29, 2007 RCRA Administrative Order on Consent ("the Consent Order") between the United States Environmental Protection Agency (EPA) and the U.S. Navy (the Navy).

EPA has completed its review of the above documents, and has the following comments:

SWMU 56 - Functional assessment and Supplemental Sediment Sampling Report, dated December 3, 2009

EPA has completed its review of the above report, which represents an interim report on the evaluation of whether or not the adjacent drainage ditches have been impacted by releases from SWMU 56. The need for and scope for such an evaluation was discussed at the October 30, 2008 meeting between EPA, the Navy, the PR Environmental Quality Board (PREQB) and their respective consultants, as memorialized in meeting notes distributed by EPA to the Navy, PREQB and their respective consultants via Email from myself on November 20, 2008. EPA and PREQB had given their concurrence to the proposed sample locations as shown in a table and figure distributed via Email dated May 20, 2009 sent by Mark Kimes (of Baker Environmental) on behalf of the Navy. The December 3, 2009 interim report indicates that "The Functional assessment and drainage ditch analytical data will be incorporated into the ecological risk assessment (ERA) previously presented within the draft CMS for the SWMU." EPA concurs. Therefore, within 60 days of your receipt of this letter please submit a work plan and a schedule for both completing the ERA and the Corrective Measures Study (CMS) for SWMU 56 and the adjacent drainage ditches. The schedule for completing the ERA and CMS must also be coordinated with your proposal for completing the evaluation of whether or not Building 207, adjacent to SWMU 56, should either be identified as new area to be investigated under requirements of the Consent Order, or included within the definition of areas impacted by releases from SWMU 56, as discussed below.

SWMU 56/Site 56A - Source Area Investigation Report, dated January 13, 2010

EPA has completed its review of the above report, which represents an interim report on the evaluation of whether Building 207 (former weapons inert storage area) and/or a portion of Rabaul Street, both adjacent to SWMU 56, should be identified as new areas to be investigated under requirements of the Consent Order, and/or included within the definition of areas impacted by releases from SWMU 56. Because samples, collected in September 2008 as part of the SWMU 56 CMS investigations, had found elevated concentrations of metal constituents in two drainage ditch sediment samples downgradient from Building 207, the need for and scope for additional sampling to determine whether Building 207 was the source area, was discussed at the October 30, 2008 meeting between EPA, the Navy, the PREQB. The scope of this sampling is memorialized in meeting notes distributed by EPA via Email from myself on November 20, 2008, and also in tables and a figure showing the proposed sample locations which was distributed via Email dated May 20, 2009 from Mark Kimes (of Baker Environmental) on behalf of the Navy. The interim report concluded that "While contamination is indicated by sediment analytical data, it cannot be definitively..." linked to Building 207, and therefore additional investigation is recommended. EPA concurs with the recommendation. Therefore, within 60 days of your receipt of this letter please submit a work plan and a schedule for implementing the additional investigations to determine if Building 207 is the likely source of the elevated metal

concentrations detected in the drainage ditch sediments, and/or whether or not that those drainage ditch sediments should be addressed as part of the areas impacted by releases from SWMU 56, or whether Building 207 and the impacted drainage ditch sediments should be addressed as a new SWMU or Area of Concern.

In addition, by letter dated February 5, 2010 to myself, the PREQB has indicated its agreement with the conclusions and recommendations made in the Source Area Investigation report, but noted several minor comments on the report. A copy is enclosed. Therefore, within 60 days of your receipt of this letter please also submit an addendum to the report addressing minor comments made in PREQB's February 5, 2010 letter.

#### SWMU 61 (Former Bundy Vehicle Maintenance Facility) – Request for Additional Sampling

EPA has completed its review of the Navy's January 8, 2010 responses to comments given with EPA's letter dated December 15, 2009, and the revised Proposal for Additional Sampling. As part of that review, EPA requested our contractor, TechLaw Inc., to provide comments on the Navy's responses and the revised proposal for additional sampling. TechLaw found the responses and proposal for additional sampling to be acceptable, except for the following:

- The headers on Pages 2 through 9 of the proposal were not updated with the date of "January 8, 2010," and instead, reference the date of the original Request for Additional Sampling. It is suggested that the Request for Additional Sampling be revised to reference the appropriate date in the page headers.
- On Page 5 of the proposal, in the second paragraph under the Subsurface Soil (3 to 11 ft bgs [below ground surface]) subheading, it is noted that six volatile organic compounds (VOCs) were detected in the subsurface soil. However, only five of the six VOCs are identified (3-chloro-1-propene, acetone, carbon disulfide, iodomethane, and trichloroethene). Table 3 indicates that chloroform was also detected in subsurface soil. The Additional Sampling should include chloroform as it is one of the six VOCs detected in soil.

Within 60 days of your receipt of this letter please submit revisions to address the above, along with a proposed schedule for completing the additional sampling (following Navy's approval of funding for project implementation) and submitting a draft Corrective Measures Study (CMS) Report for SWMU 61.

In addition, TechLaw made the following comment, which will not require a response at this time; however, the Navy will need to address this issue in the draft CMS Report, when submitted:

- In General Comment 2, EPA requested that Table 3, Summary of Detected Laboratory Results, Subsurface Soil, be revised to include a comparison of subsurface soil data to Protection of Groundwater Soil Screening Levels (SSLs), and that the Request for Additional Sampling be revised to include a discussion of the potential for soil contaminants to impact groundwater. The Navy has responded that it will not make either of the requested changes. This response is inadequate. While it is agreed that groundwater data will allow for a “quantitative determination of groundwater quality,” a comparison of soil data to SSLs will aid in determining what constituents in soil, if any, may be contributing to groundwater contamination that has already been identified at the site. The SSLs, as published on EPA’s Regional Screening Level (RSL) table, were developed using conservative default parameters, including a dilution attenuation factor (DAF) of 1 (which may or may not be applicable to SWMU 61). In lieu of screening against the default SSLs, the potential for migration to groundwater could be evaluated by developing site-specific migration to groundwater SSLs or assessing leaching test results, if available. However, the final Corrective Measures Study (CMS) Report will need to include a discussion and evaluation of the potential for contaminants in soil to impact groundwater quality, since leaching of soil contaminants to groundwater is a potential chemical transport mechanism at the site. Note, the results of any RSL SSL screening would represent one line of evidence that should be used to support any final decisions regarding extent of contamination, and the results of such an evaluation should be used in conjunction with the results from any groundwater data collected to identify areas targeted for remediation.

#### SWMU 62 – Navy’s Responses to comments and Revised Final Phase I RFI Report

EPA has completed its review of the Navy’s January 13, 2010 Responses to comments given with EPA’s December 15, 2009 letter and the January 13, 2010 Revised Final Phase I RFI Report. Based on our review, EPA has determined they are acceptable. Please note that by letter dated February 5, 2010 to myself, the PREQB has indicated its approval of the responses and revised Phase I RFI report. A copy is enclosed. As requested in my December 15, 2009 letter, please submit a draft Work Plan for a Full RFI.

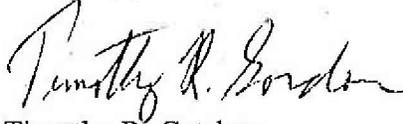
#### AOC F – Navy’s Responses to EPA’s Comments on Draft – Year 7 Annual Report, dated December 30, 2009

EPA has completed its review of the Navy’s December 30, 2009 Responses to EPA’s September 29, 2009 letter and October 2, 2009 Email commenting on the Draft – Year 7 Annual Report, the revisions to the Year 7 Report, and the proposal to address data gaps at AOC F. As part of that review, EPA requested our contractor, TechLaw Inc., to provide comments on the Navy’s responses and the proposal to address data gaps at AOC F. Based on those reviews, EPA has determined that the Responses and the December 30, 2009 revisions to the Year 7 Report are acceptable. Though the December 30, 2009 proposal to address data gaps at AOC F is generally

acceptable, EPA cannot give its final approval since no schedule is included, and the proposal indicates the additional work will be implemented "when the Navy obtains the necessary funding...". Therefore, EPA requests that within 75 days of your receipt of this letter, the Navy submit a work plan and a schedule for implementing (following Navy's approval of funding) the additional work described in the December 30, 2009 proposal to address data gaps at AOC F.

If you have any questions, please telephone me at (212) 637- 4167.

Sincerely yours,



Timothy R. Gordon  
Project Coordinator  
Resource Conservation and Special Projects Section  
RCRA Programs Branch

Enclosures (2)

cc: Ms. Wilmarie Rivera, P.R. Environmental Quality Board, w/o encls.  
Ms. Gloria Toro, P.R.Environmental Quality Board, w/o encls.  
Mr. Mark Kimes, Baker Environmental, w/encls.  
Ms. Cathy Dare, TechLaw Inc., w/encls.  
Mr. Felix Lopez, USF&WS, w/encls.



COMMONWEALTH OF PUERTO RICO  
Office of the Governor  
Environmental Quality Board

Land Pollution Control Area

February 5, 2010

Mr. Timothy Gordon  
RCRA Programs Branch  
U.S. Environmental Protection Agency – Region II  
290 Broadway – 22<sup>nd</sup> Floor  
New York, New York 10007-1866

**RE: REVIEW LETTER REPORT – SWMU 56/SITE 56A  
SOURCE AREA INVESTIGATION REPORT  
NAVAL ACTIVITY PUERTO RICO (NAPR), CEIBA  
EPA ID. NO, PR2170027203**

Dear Mr. Gordon:

The Hazardous Wastes Permits Division (HWPD) has finished the review of the above-mentioned document. Michael Baker, Jr., Inc. submitted the document on behalf of the Navy.

The Navy has completed the environmental sampling and laboratory analysis activities as agreed on the October 30, 2008 meeting between the Navy, the Environmental Protection Agency (EPA) and the Puerto Rico Environmental Quality Board (PREQB) in New York. As a result of the discussion during the meeting, on May 20, 2009 the navy Submitted a figure by electronic mail to illustrate the proposed sampling location. EPA and PREQB subsequently approved the sampling locations. The samples collection was performed during June 2009 and a PREQB representative was present in the field, a sediment sampling oversight report was prepared (July 16, 2009).

The additional sampling was performed according to the approved Final Corrective Measures Study Work Plan SWMU 56 (Baker, 2007). PREQB agreed with the conclusions and recommendations presented at the report. However, have the following minor comments to be considered by the Navy:

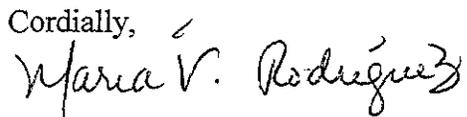
- 3) Table 2, Page 4 of 6, the concentration of Beryllium for sample number 56A-SD08 should be underlined.
- 4) Figure 4 should be revised to:
  - a. Correct the Site ID for 56A-SD03, the table presents SD01 instead of SD03.
  - b. Explain why the Beryllium concentration of sample 56A-SD06 is shaded, against what ecological screening value was compared.
  - c. Revise the concentrations of Beryllium and Cadmium at sample 56A-SD08 to agree with the concentrations on Table 2.

Mr. Tim Gordon  
February 8, 2010  
Letter Report SWMU 56/Site 56A...  
Page 2

The previously mentioned comments should be addressed but does not preclude the Navy to continue with this investigation and present a Work Plan for revision.

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

Cordially,



María V. Rodríguez Muñoz  
Manager  
Land Pollution Control Area

cc. Ariel Iglesias Portalatín  
USEPA-CEPD Response and Remediation Branch  
Centro Europa Building Suite 417  
1492 Ponce de Leon Avenue  
San Juan, PR 00907-4127

Wilmarie Rivera, PREQB  
Federal Facilities Coordinator

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COMMONWEALTH OF PUERTO RICO  
OFFICE OF THE GOVERNOR  
ENVIRONMENTAL QUALITY BOARD

Land Pollution Control Area

February 5, 2010

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

**RE: Revised Final Phase I RFI Report  
SWMU 62 – Former Bundy Disposal Area  
Response to EPA and PREQB Comments  
Naval Activity Puerto Rico (NAPR), Ceiba  
EPA ID No. PR2170027203**

Dear Mr. Gordon:

The Hazardous Wastes Permits Division has finished the review of the above-mentioned document. The document was submitted in accordance with EPA comments dated December 15, 2009.

The Navy responds to EPA's comments and the Revised Final pages were sent. The appropriate replacement of the pages was performed. PREQB already approved the report as a Final Version in a letter dated November 9, 2009. 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,

María V. Rodríguez Muñoz  
Manager  
Land Pollution Control Area

cc: Ariel Iglesias Portalatín  
Wilmarie Rivera, Federal Facilities Coordinator



COMMONWEALTH OF PUERTO RICO  
OFFICE OF THE GOVERNOR  
ENVIRONMENTAL QUALITY BOARD

Land Pollution Control Area

January 27, 2010

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

**RE: REVIEW FINAL MONITORED  
NATURAL ATTENUATION  
AOC F YEAR 7 ANNUAL REPORT  
NAVAL ACTIVITY PUERTO RICO (NAPR)  
CEIBA, PR PR2170027203**

Dear Mr. Gordon:

The Hazardous Wastes Permits Division has finished the review of the above-mentioned document. The document was submitted in accordance with PREQB comments dated September 2, 2009.

Revision of the responses and insertion of the replacement pages was accomplished. The Navy adequately responds to PREQB's comments and the Final document reflect its respective consideration. Hence, we hereby approved the report as a Final Version. 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,

María V. Rodríguez Muñoz

Manager

Land Pollution Control Area

cc: Ariel Iglesias Portalatín  
Wilmarie Rivera, Federal Facilities Coordinator