



**DEPARTMENT OF THE NAVY**  
**BASE REALIGNMENT AND CLOSURE**  
**PROGRAM MANAGEMENT OFFICE SOUTHEAST**  
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**BPMOSE med/0001**  
**01 Oct 10**

U.S. Environmental Protection Agency  
Region 2  
Mr. Timothy Gordon  
290 Broadway – 22nd Floor  
New York, NY 10007-1866

**Subj: SWMU 73 REVISED DRAFT CORRECTIVE MEASURES STUDY REPORT  
EXTENSION REQUEST, NAVAL ACTIVITY PUERTO RICO**

Dear Mr. Gordon:

Per your letter dated 16 Sep 2010, the United States Environmental Protection Agency (USEPA) requested by 1 Nov 2010 the submittal of a Revised CMS Investigation Report, necessary revisions to the Army's 12 Aug 2010 responses to USEPA's original comments dtd 27 May 2010, responses to USEPA's comments dated 16 Sept 2010 and response to Puerto Rico Environmental Quality Board's (EQB) comments dated 4 Feb 2010.

Per USEPA's 16 Sep 2010 letter, several of the United States Army Public Health Command's (the Army) responses to comments were considered unacceptable. The Army has considered those responses and determined that additional soil and groundwater sampling must be performed in order to address USEPA and EQB comments. Data from the additional sampling will be used to prepare a revised Draft CMS report.

The additional sampling will require more time. The Army must collect the samples per requirements of the CMS work plan. Samples must be analyzed, undergo 3rd party data validation, be certified by a licensed Puerto Rico chemist and then the data must be used to revise the risk assessment. Additionally, No Further Action will not be the only corrective measure evaluated in the revised CMS. Also necessary is time for the Army Reserve Command and Navy to review the revised CMS report and responses to comments prior to submittal to USEPA.

A revised delivery date of 1 May 2011 is requested for submittal of the revised CMS and response to USEPA and EQB comments.

01 Oct 10

Should you have any questions, please contact me at (843) 743-2124 or by email at [mark.e.davidson@navy.mil](mailto:mark.e.davidson@navy.mil).

Sincerely,



MARK E. DAVIDSON

BRAC Environmental Coordinator

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