



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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SEP 16 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) Revised Final II Summary Report for Environmental Background Concentrations of Inorganic Compounds
- 2) SWMU 3 (Closed Solid Waste Landfill) – Report on March 2010 Sampling Event
- 3) SWMU 70 (Former Disposal Area Northwest of Landfill) – Draft Full RFI Work Plan
- 4) SWMU 73 (Camp Moscrip) – Responses to Comments on Draft CMS Investigation Report
- 5) SWMU 74 (Fuel Pipelines and Hydrant Pits) – Revised Final Phase I Report and Phase II CMS Investigation Work Plan

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:

Revised Final II Summary Report for Environmental Background Concentrations of Inorganic Compounds

EPA has completed its review of the Navy's July 2010 Responses to EPA's May 2010 Comments on Addendum B (Airfield Background Soil) and Addendum C (Freshwater Drainage Ditch Sediment) of the Revised Final II Summary Report for Environmental Background Concentrations of Inorganic Compounds, Dated April 29, 2010. EPA will approve the Responses and the July 30, 2010 Revised Final II Summary Report for Environmental Background Concentrations of Inorganic Compounds, subject to the following future requirements:

- 1) Should a human health risk assessment (HHRA) be warranted at a SWMU or AOC, selection of chemicals of potential concerns (COPCs) must be done in accordance with EPA risk assessment guidance. Therefore, when conducting a baseline HHRA, the risk and hazard must be quantified for inorganic compounds that are detected above risk-based screening criteria, regardless of background concentrations.
- 2) In the future, ensure that baseline HHRA's include the following procedures:
 - a) Any inorganic compound detected above *risk-based* screening criteria must be selected as a COPC. Inorganic compounds exceeding risk-based screening criteria should *not* be excluded if they are detected below background concentrations.
 - b) Risk potential and hazard quotients should be quantified for all COPCs (including inorganic COPCs as discussed in #1 above).
 - c) The risk characterization and/or the uncertainty analysis should present a discussion of the *total risk*, the *risk attributable to background* and the *risk attributable to site-related levels*.
- 3) When the non-airfield freshwater drainage ditch sediment background data-set given in Addendum C is updated with additional data points, ensure that a test for outliers is conducted. If outlier results are not removed from the data-set, justification for retaining the outlier results must be provided.

SWMU 3 (Closed Solid Waste Landfill) – Report on March 2010 Sampling Event

EPA has completed its review of the June 25, 2010 Report on the March 2010 Sampling Event (the Report). As part of that review, EPA requested our consultant, TechLaw Inc., to review portions of the Report. TechLaw had the following comments on the Report:

Figure 2-1, Groundwater Contour Map, and Table 2-4, Groundwater Velocity

Calculations: It is unclear why hydraulic gradients were established using distances between contour lines and not distances between monitoring wells, where the groundwater elevations are firmly established. For example, Line 2 is set in an area away from other wells. It is recommended that groundwater elevations collected from site monitoring wells be used to establish hydraulic gradients in future groundwater monitoring reports for SWMU 3. Please note that this issue was also identified in previous semi-annual groundwater monitoring report reviews. EPA will not require submission of a revised Report, but this issue should be considered in future reports.

Also, TechLaw found that Section 3.3, Data Quality Control and Validation, indicated that several qualifications were necessary due to contamination in initial/continuing calibration blanks and associated method, laboratory and field quality assurance/quality control (QA/QC) samples, and matrix spike recoveries. Please note that this issue was also identified during reviews of previous semi-annual groundwater monitoring reports. EPA will not require submission of a revised Report, but may consider conducting a detailed review of future data validation reports if this issue reoccurs.

In addition, the Puerto Rico Environmental Quality Board (PREQB) has reviewed the Report. In its August 12, 2010 letter to myself, PREQB indicated that it concurred with the conclusions and recommendations made in the Report, and had no additional comments.

SWMU 70 (Former Disposal Area Northwest of Landfill) – Draft Full RFI Work Plan

EPA has completed its review of the Draft Full RFI Work Plan, dated June 30, 2010.

As part of that review, EPA requested our consultant, TechLaw Inc. to review the Full RFI Work Plan proposal. TechLaw's comments are given in the enclosed Technical Review dated September 1, 2010 (Encl. #1). Please submit, within forty five days of your receipt of this letter, written responses to comments in the enclosed Technical Review and any necessary revisions to the Full RFI Work Plan.

In addition, the Puerto Rico Environmental Quality Board (PREQB) has several comments on the RFI Work Plan. Those are given in the August 17, 2010 letter to myself, which is enclosed with this letter (Encl. #2). Please submit written responses to PREQB's comments and any necessary revisions to the Full RFI Work Plan within forty five days of your receipt of this letter.

SWMU 73 (Camp Moscrip) – Responses to Comments on Draft CMS Investigation Report

EPA has completed its review of the Department of the Army's August 12, 2010 Responses to EPA's Comments on the February 4, 2010 Draft CMS Investigation Report (transmitted by EPA's letter of May 27, 2010 to yourself). As part of that review, EPA requested our consultant, TechLaw Inc. to review the August 12 Responses. TechLaw's comments are given in the enclosed Technical Review dated September 10, 2010 (Encl. #3).

Except for the six Responses discussed in the enclosed Technical Review, the Army's August 12, 2010 Responses appear to be generally acceptable. However, EPA's full approval of them cannot be given until we receive and review the revised CMS Investigation Report for SWMU 73, which was requested by our EPA's letter of May 27, 2010. In addition, please note that the Department of the Army's August 12, 2010 Responses do not address the PR Environmental Quality Board's (PREQB's) comments on the February 4, 2010 Draft CMS Investigation Report, which were included as Enclosure #3 to EPA's letter of May 27, 2010 to yourself.

Therefore, rather than submitting a separate revision to the August 12, 2010 Responses at this time, EPA requests that when the revised CMS Investigation Report for SWMU 73 is submitted, please include the following:

- 1) All necessary revisions to the Department of the Army's August 22, 2010 Responses to EPA/TechLaw's original comments (transmitted with EPA's letter of May 27, 2010), and the comments in the attached September 10, 2010 Technical Review (Enclosure #3); and
- 2) Responses to address PREQB's comments on the Feb 4, 2010 Draft CMS Investigation Report for SWMU 73, which were included with EPA's letter of May 27, 2010 to the Navy.

Please submit the revised CMS Investigation Report and above Responses by November 1, 2010, as was previously indicated in my Email of September 14, 2010 to Mr. Barrett Borry of the Department of the Army.

SWMU 74 (Fuel Pipelines and Hydrant Pits) – Revised Final Phase I Report and Phase II CMS Investigation Work Plan

EPA has completed its review of the Revised Final Phase I Report and the Phase II CMS Investigation Work Plan, dated July 9, 2010. EPA has determined that the Revised Final Phase I Report is acceptable. Also, EPA requested our consultant, TechLaw Inc., to review the Phase II Work Plan proposal. TechLaw's comments on the Phase II Work Plan are given in the enclosed Technical Review dated September 1, 2010 (Encl. #4). Please submit, within forty five days of your receipt of this letter, written responses to comments in the enclosed Technical Review and any necessary revisions to the Phase II CMS Investigation Work Plan.

In addition, the Puerto Rico Environmental Quality Board (PREQB) has reviewed the Revised Final Phase I Report and concurred with its conclusions and recommendations. PREQB had no other comments on the Phase II CMS Investigation Work Plan. (Refer to PREQB letter dated August 13, 2010 to myself).

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 (4)

cc: Ms. Wilmarie Rivera, P.R. Environmental Quality Board, w/encls. #1, 3 and 4
Ms. Gloria Toro, P.R. Environmental Quality Board, w/encls., #1, 3, and #4
Mr. Barrett Borry, Department of the Army, w/encl. #3.
Mr. Mark Kimes, Baker Environmental, w/encls.
Ms. Cathy Dare, TechLaw Inc. w/o encls.
Mr. Felix Lopez, USF&WS, w/o encls.

REPA4R2-002-ID-201

**TECHNICAL REVIEW OF THE
DRAFT FULL RCRA FACILITY INVESTIGATION WORK PLAN
SWMU 70 – DISPOSAL AREA NORTHWEST OF LANDFILL
DATED JUNE 30, 2010**

**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.
221 Mineola Boulevard
Mineola, NY 11501**

EPA Task Order No.	002
Contract No.	EP-W-07-018
TechLaw TOM	Cathy Dare
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September 1, 2010

**TECHNICAL REVIEW OF THE
DRAFT FULL RCRA FACILITY INVESTIGATION WORK PLAN
SWMU 70 – DISPOSAL AREA NORTHWEST OF LANDFILL
DATED JUNE 30, 2010**

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

The following comments were generated based on review of the June 30, 2010, *Draft Full RCRA Facility Investigation Work Plan: SWMU 70 – Disposal Area Northwest of Landfill*, Naval Activity Puerto Rico, Cieba, Puerto Rico (Work Plan).

GENERAL COMMENTS

1. The Work Plan is lacking several elements required by *EPA Requirements of Quality Assurance Project Plans (QAPP)*, dated March 2001 (QA/R-5). These elements are necessary to evaluate the proposed Work Plan:

- Laboratory specific information including standard operating procedures; method detection limits, reporting limits (RLs), quality control (QC) acceptance limits, analytical calibration procedures and acceptance criteria, and corrective actions should the calibration/QC criteria be exceeded must be provided for the currently proposed analytical methods.
- Specific procedures for data verification and validation of the proposed methods must be provided. While the referenced Management Plan provides validation procedures, it does not include how data generated by Methods 6020A, 8260B, 6010C, 9012A, 1010/1030, 9040B/9045C, 9034, 9060 or Acid Volatile Sulfides/Simultaneously Extracted Metals will be validated.
- Project specific completeness goals for both the field and laboratory have not been provided. In addition, the Work Plan does not indicate if any proposed samples are deemed critical to this investigation.
- There is no project specific discussion of how precision, accuracy, representativeness, comparability and completeness and sensitivity (PARCCS) measures will be incorporated into a data quality assessment, how completeness will be measured for this project, or if an evaluation of significant trends and biases will be included as part of a data quality assessment.
- Examples of all forms and checklists to be used have not been provided (e.g., chain-of-custody forms; sample labels, audit checklists, data validation checklists).

Revise the Work Plan to provide this information.

2. A data quality objective (DQO) section should be provided in the Work Plan. The DQO section should clearly define the problem and the environmental questions that

should be answered for the current investigation. Project decision "If..., then..." statements should be developed, linking data results with possible actions. The DQOs should also identify the type, quantity, and quality of data needed to answer the study questions. The following information should be added to the Work Plan so that complete DQOs are presented;

- Provide project decision conditions ("If..., then..." statements) for each matrix and/or decision area.
- Specify how "good" the data need to be in order to support the environmental decision (e.g., definitive-data with 100% validation).
- Provide the rationale for the proposed number of samples for each area of interest, matrix, and interval. In addition, provide the rationale for the proposed type of sample (e.g., grab samples vs. composite samples as well as random samples vs. judgmental samples). The rationale should provide sufficient detail to explain why each of these will address the environmental questions being asked.

Revise the Work Plan to include this information.

3. Although discussed in Section 4.6.2 of the Work Plan, human health screening values [i.e., Regional Screening Levels (RSLs), federal drinking water maximum contaminant limits (MCLs)] and background screening values have not been presented in the Work Plan. Only ecological screening levels (ESLs) were presented. Verification that the laboratory reporting limits will be able to meet screening level values cannot be performed without a presentation of all of the screening values to be used. Revise the Work Plan to provide all screening criteria to allow for comparison to analytical results. Ensure that laboratory RLs are also provided alongside the screening values.
4. Figure 4-1 indicates that a statistical process will be used to evaluate the data generated during this effort. However, it appears that sample locations will be judgmental and not randomly chosen. Therefore, statistical analysis of the data is not appropriate. Revise the Work Plan to clarify this apparent discrepancy.
5. Appendix D discusses EPA Region 2's low-flow sampling procedures but does not indicate the type of pump to be used during groundwater sampling. Revise the Work Plan to specify the type of pump that will be used during groundwater sampling.
6. The Work Plan does not specify that exceedances of human health and/or ecological risk-based screening criteria warrant the need for a Human Health Risk Assessment (HHRA) and/or Ecological Risk Assessment (ERA) if complete exposure pathways exist. Clarify that detected concentrations of chemicals will be compared to generic human health and/or ecological risk-based screening criteria only as part of the RCRA Facility Investigation (RFI), and that if exceedances exist, a HHRA and/or ERA will be conducted as part of the Corrective Measures Study Work Plan, unless

sufficient justification is provided to demonstrate that a HHRA and/or ERA is not warranted.

7. The Work Plan indicates that "background screening values" will be used to evaluate analytical results relating to both human and ecological receptors. Consistent with EPA guidance and following agreements with the Navy, inorganics that exceed human health risk-based screening criteria cannot be eliminated from the quantification of SWMU-specific risk and hazard regardless of background concentrations. Specifically, the EPA raised this issue in a comment letter dated January 23, 2009 on the Draft Final Correctives Measure Study for Solid Waste Management Unit (SWMU) 68. The Navy responses to the EPA comment letter, dated June 12, 2009, stated that chemicals detected above risk-based screening criteria will be retained as Chemicals of Potential Concern (COPCs) and assessed under total baseline conditions. The Navy's responses further stated that those chemicals at or below background levels (non-site related) will be discussed as part of the risk characterization and then exit the risk assessment process. This approach is consistent with U.S. Navy Human Health Risk Assessment Guidance (available at <http://www-nmcphc.med.navy.mil/downloads/ep/Chapters%201-12.pdf>). Note that this approach appears to be acceptable based on EPA's approval letter dated August 6, 2009 for the Final Correctives Measure Study for SWMU 68 (Baker, 2009b).

Ensure that the Work Plan (e.g., first paragraph of Section 4.6.2, Human Health Screening Values, and Section 4.6.3, Background Screening Values) is revised to reflect these previous agreements to maintain consistency among all HHRAs performed at Naval Activity Puerto Rico (NAPR) SWMUs and demonstrate compliance with EPA-recommended risk assessment methodologies. HHRAs conducted for NAPR SWMUs should quantify SWMU-specific risk and hazard for any and/or all inorganic compounds that exceed residential or industrial health-based screening criteria. Further, the uncertainty analysis, presented as part of the risk characterization, should include a refinement of risk. This refined risk evaluation should present a breakdown of the total SWMU-specific risk as site-related risk and background risk. This will provide the basis for exiting such inorganic COPCs from the HHRA process (i.e., show that such inorganic COPCs should exit at the end of Tier 2, Baseline HHRA, and not continue to the Tier 3 process, risk assessment for selection of remedial alternatives).

With respect to ERAs, the Navy's approach is generally consistent with EPA guidance because inorganic compounds are not excluded based on background in Step 2 (Tier 1) of the Navy's ERA process, and Step 3.a (Tier 2) does include a refinement of risk based on statistical background comparisons (much like the refinement of risk conducted as part of the HHRA uncertainty analysis).

8. MCLs should not be used to screen groundwater data; MCLs are not solely risk-based. Groundwater exceedances of risk-based screening criteria warrant an HHRA unless land use controls and/or institutional controls are in place at SWMU 70 to prevent consumption of groundwater (e.g., residential development). Further, if a

HHRA is warranted, note that groundwater COPCs should be selected based on comparison of analytical results to the applicable Tap Water Regional Screening Level (RSL) and not the MCL during the HHRA conducted as part of the CMS. Revise the Draft RI Work Plan to update Section 4.6.2, Human Health Screening Values, accordingly and omit Section 4.6.2.2, Federal Drinking Water MCLs, or provide adequate justification for not doing so.

9. Ensure that contract-required quantitation limits (QLs) are low enough to meet human health and ecological screening criteria. Revise the Work Plan to show that QLs will be low enough to meet data quality standards for risk assessment purposes. The requested revision can be addressed by simply adding/updating tables that compare the QLs to applicable human health and ecological screening values.
10. Appendix D discusses EPA Region 2's low-flow sampling procedures but does not indicate the type of pump to be used during groundwater sampling. Revise the Work Plan to specify the type of pump that will be used during groundwater sampling.
11. Figure 1-3 of the Work Plan outlines three areas in the western portion of SWMU 70 (east and northeast of sample location 70SB06) in blue. According to the figure legend, this color denotes a "water boundary," which would seem to indicate that these areas may be surface water bodies, at least for part of the year. Standing water appears to be present in the largest of the three areas in the aerial photograph. However, except for Ensenada Honda, the Work Plan does not discuss the presence of surface water at the site. Revise the Work Plan to clarify if surface water bodies are present at SWMU 70, even if only for part of the year. If so, these areas need to be discussed in the Work Plan and investigated.
12. The link between groundwater and surface water at SWMU 70 has not been adequately described in the Work Plan. Figure 1-3 indicates that a large portion of SWMU 70 has been identified as estuarine wetlands, and the Work Plan details plans to collect 19 sediment samples in these areas. As noted in the General Comment 11 on Figure 1-3, the Work Plan does not discuss the presence of surface water at SWMU 70, other than Ensenada Honda. The presence of shallow groundwater is noted several times in the Work Plan. On page 4-3, Section 4.6.1.2 of the Work Plan states that groundwater sampling results will be compared to surface water (specifically, saltwater) screening. Although the rationale for this decision is not explained, it is possible that shallow groundwater in the wetland areas rises above the soil surface and exists as surface water at least part of the time. However, this occurrence is not mentioned in the text of the Work Plan. The presence of surface water, even if sporadic, could indicate the presence of additional ecological receptors and exposure pathways. Revise the Work Plan to include information about the connection, if any, between groundwater and surface water at SWMU 70.
13. The Work Plan does not discuss potential ecological receptors that could be exposed to contaminants in soil, sediment, or groundwater at SWMU 70. Revise the

Work Plan to specify that biota at or hydrologically downgradient from SWMU 70 will be discussed in the subsequent RFI Report.

14. Appendix C of the Work Plan shows that several bioaccumulative COPCs, those with $\log K_{ow}$ above 3.5, were detected in soil samples from SWMU 70 and open water sediment samples from Ensenada Honda during the Phase I RFI. These COPCs include benzo(a)anthracene, benzo(a)pyrene, chrysene, dibenz(a,h)anthracene, fluoranthene, and pyrene. Many of these detections were estimated. Although the previously detected concentrations did not exceed risk-based ecological screening levels, bioaccumulation of these contaminants may occur through food webs and impact upper trophic level receptors. However, the Work Plan does not discuss this issue, and no additional soil or sediment samples will be analyzed for these COPCs in the Full RFI. The potential impact to ecological receptors via bioaccumulation of COPCs should be addressed in order to be protective. Revise the Work Plan accordingly to explain why additional sampling is not warranted to address COPCs that bioaccumulate.

SPECIFIC COMMENTS

1. **Section 2.2.1, Phase II ECP, Page 2-1:** This section indicates that subsurface soil samples were proposed but not collected from soil boring locations 16E-03 through 16E-06 because the groundwater at these four locations was encountered at depths ranging from 0.3 foot below ground surface (bgs) to 1.2 feet bgs. However, no discussion regarding these potential data gaps has been provided. Also, additional subsurface soil sampling near 16E-03 through 16E-06 was not included in this Work Plan. Revise the Work Plan to discuss how these data gaps will be addressed.
2. **Section 2.2.2, Phase I RFI, Page 2-3:** The text indicates that acetone exceeded the ESL at three surface soil locations (70SB06, 70SB07, and 70SB08), and concludes that the acetone is a result of laboratory contamination. However, the levels of acetone reported in Appendix C, page 8 of 18, appear to be significantly higher (i.e., approximately 2 orders of magnitude in some cases) than the reporting limit for acetone. Further, no information has been presented to support the conclusion that acetone should be considered a laboratory contaminant (i.e., if acetone was observed in the corresponding laboratory method blanks, trip blanks, the levels it was found in the blanks as compared to the samples, etc.). Without further information to support the conclusion that elevated acetone results were the result of laboratory contamination, acetone should not be eliminated from future sediment investigations. Revise the Work Plan to either provide supporting information that acetone in sediment samples was the result of laboratory contamination or include acetone in the list of analytes that will be addressed in estuarine and open water sediment samples for this investigation.
3. **Section 3.1, Soil Sampling and Analysis Program, Page 3-1:** Under the first bullet of this section, two additional groundwater samples are proposed to delineate arsenic in groundwater; however, they are located south and west of the existing well 70SB01

and there does not appear to be any delineation of groundwater to the north or east of well 70SB01. Revise the Work Plan to discuss the rationale for the groundwater sampling around well 70SB01 or propose additional wells to fully delineate arsenic in this area.

4. **Section 3.1, Soil Sampling and Analysis Program, Page 3-1:** Under the first bullet, the text states, "One surface, one shallow subsurface [1 to 3 feet (ft) below ground surface (bgs)] sample and a groundwater sample will be collected from soil borings 70SB01, 70SB15 and 70SB16." However, it is unclear why surface and subsurface soil is proposed at 70SB01 since it is an existing well location. Revise the Work Plan to address this.
5. **Section 3.1, Soil Sampling and Analysis Program, Page 3-1:** Under the second bullet of this section, two additional groundwater samples are proposed to delineate arsenic and vanadium in groundwater; however, they are located south and west of the existing well 70SB02 and there did not appear to be any delineation of groundwater to the north or east of well 70SB02. Revise the Work Plan to discuss the rationale for the groundwater sampling around well 70SB02 or propose additional wells to fully delineate arsenic and vanadium in this area.
6. **Section 3.1, Soil Sampling and Analysis Program, Page 3-2:** The text indicates that a boring log will be maintained during soil boring installation "indicating, among other things, lithology, water occurrence, photoionization detector (PID) measurements and other observations." The text should be revised to clarify what information is required for the boring log and a specific list of items that will be presented in the boring log. Revise the Work Plan to provide this information.
7. **Section 3.2, Monitoring Well Installation, Page 3-4:** The text states, "The wells will be developed until the discharged water runs relatively clear of fine-grained materials." The text further indicates that typical limits placed on well development may include, "Clarity of water based on visual determination." Since the clarity of the water is a qualitative measure that could be subjective based on the person making observations, it is recommended that three to five borehole volumes be removed to ensure proper development, at a minimum. Revise the Work Plan to require the removal of at least three to five borehole volumes during well development.
8. **Section 3.4, Sediment Sampling and Analysis, Page 3-6:** The text states, "If field conditions indicate that the proposed samples should be classified as soil, the sampling program will be modified to reflect the change in media and surface and subsurface soil samples will be collected;" however, it is not clear what the field conditions are or what criteria will be used to distinguish between sediment and soil. Revise the Work Plan to include specific criteria for determining the nature of media at the site.
9. **Section 3.4, Sediment Sampling and Analysis, Page 3-5:** In the description of the methodology to be used for collecting sediment samples for the Full RFI, the Work

Plan does not indicate the depth to which sediment will be collected. In order to represent the most relevant exposures for sediment-dwelling ecological receptors, sediment samples should be collected from zero to six inches below ground surface. Revise this section to clarify the planned depth range for sediment sampling.

10. **Section 3.5.2, Equipment Rinsates, Page 3-7:** This section indicates that the equipment rinsate samples will be collected from macro core liners for soils and from the Teflon-lined polyethylene tubing for groundwater. The liners and tubing are usually not decontaminated in the field; therefore, it is recommended that the equipment rinsates be collected from equipment that has been decontaminated (e.g., groundwater pump) to ensure no cross-contamination has occurred. In addition, this section does not identify hand augers as a potential piece of equipment that may require a rinsate sample. Revise the Work Plan to indicate that equipment rinsates will be collected from equipment requiring decontamination and identify all potential equipment.
11. **Section 3.6.5, Investigation Derived Waste Management, Page 3-8:** It is unclear if investigation derived waste (IDW) will be combined from multiple borings into one 55-gallon drum or if each boring will have its own drum. Also, it was unclear how the procedure for potentially replacing the soil cuttings into the borings would be implemented if the soil cuttings are combined from multiple borings into one 55-gallon drum. Revise the Work Plan to clarify IDW management procedures.
12. **Section 3.6.5, Investigation Derived Waste Management, Page 3-8:** More detailed IDW sampling procedures should be provided. The Work Plan should indicate how each aliquot of IDW will be collected for soil, and how these aliquots will be combined for the composite sample. Revise the Work Plan to provide this information.
13. **Section 3.6.7, Delineation of Wetland Boundaries, Page 3-9:** This section indicates wetland delineation will be performed at the site; however, the timing and any potential effect on sampling locations was not included. For example, proposed sediment sample location 70SD17 is currently shown on Figure 3-1, Proposed Full RFI Sample Location Map, as being located in an upland area. It was not clear if this sample location would contain sediment or soil. Revise the Work Plan to include the timing of the wetland delineation and any potential adjustments to sample locations or media based on the wetland delineation.
14. **Section 3.6.7, Delineation of Wetland Boundaries, Page 3-9:** This section indicates wetland delineation will be performed at the site; however, the timing and any potential effect on sampling locations was not included. For example, proposed sediment sample location 70SD17 is currently shown on Figure 3-1, Proposed Full RFI Sample Location Map, as being located in an upland area. It was not clear if this sample location would contain sediment or soil. Revise the Work Plan to include the timing of the wetland delineation and any potential adjustments to sample locations or media based on the wetland delineation.

15. **Section 3.6.10, Chain-of-Custody, Page 3-9:** This section states that chain-of-custody procedures will be followed; however, these procedures have not been provided in the Work Plan. Revise this section to provide the chain-of-custody procedures to be followed.
16. **Section 4.0, Reporting, Pages 4-1 through 4-9:** This section does not indicate that a data quality assessment will be included in the final report. Revise this section to specify that a data quality assessment will be part of the final report, and specify what will be included in the data quality assessment (e.g., an evaluation of PARCCS, significant trends and biases, comparing data to DQOs to ensure questions were addressed, etc.).
17. **Section 4.6.1.2, Groundwater Screening Values, Page 4-3:** This section indicates that chronic saltwater National Ambient Water Quality Criteria (NAWQC) were preferentially used as groundwater screening values. However, neither the salinity of the groundwater at SWMU 70, nor the rationale behind the use of saltwater NAWQC are discussed in the Work Plan. In the interest of clarity and completeness, revise the Work Plan to explain the use of saltwater NAWQC as opposed to groundwater screening criteria.
18. **Section 4.6.1.3, Sediment Screening Values, Page 4-5:** The Work Plan indicates in Section 3.4 that sediment samples will be collected for Acid Volatile Sulfide and Simultaneously Extracted Metals (AVS/SEM) analysis. AVS/SEM analysis is useful in quantifying the bioavailability of divalent metals. However, the Work Plan does not explain how the AVS/SEM data will be used in the sediment screening process. Revise the Work Plan to clarify how the AVS/SEM data will be used.
19. **Section 4.7, Conclusions and Recommendations, Page 4-8:** This section states that information from the physical and analytical results will be synthesized into conclusions regarding site conditions; however, this section does not describe how data usability will impact the conclusions and recommendations. Revise the section to address this issue.
20. **Section 4.7, Conclusions and Recommendations, Page 4-8:** This section states that data obtained during the field effort will be incorporated into the web based Geographic Information System (GIS) currently residing on the NAPR project team web site; however, it is unclear if the database is compared to the hard copy data to ensure its accuracy. Also, it is unclear if validation qualifiers will be entered into the database to ensure qualifications are considered when using the database (i.e., especially if data are rejected during validation). Revise the Work Plan to discuss how the accuracy of the database is ensured and to clarify if the validation qualifiers are entered in the database.

21. **Section 6.1, Project Team Responsibilities, Page 6-1:** This section does not provide the responsibilities of all the project team members (e.g., laboratory chemist, data validator, etc.). Revise the section to provide a list of all the members of the project as well as their responsibilities.
22. **Table 3-1, Summary of Sampling and Analytical Program – Environmental Samples:** The table indicates that the groundwater sampling depths are not applicable. However, the Work Plan should specify the depth at which the pump will be set in the well during sample collection. Revise the Work Plan to provide this information.
23. **Table 3-3, Method Performance Limits:** This table contains analytes that have RLs above ecological screening levels, (e.g., copper, nickel, and silver). However, the Work Plan does not specify how analytes with reporting limits that exceed screening levels will be evaluated or qualified. This is particularly important since the RLs in Table 3-3 are based on wet weight results, and they will be elevated when corrected for dry weight. Finally, it is unclear if the laboratory chosen will be able to meet the reporting limits presented in the table. Revise the Work Plan to present the laboratory specific reporting limits, indicate which analytes have screening levels below the reporting limits and clarify how results will be evaluated and/or qualified if screening levels are below the reporting limit.
24. **Table 3-1, Summary of Sampling and Analytical Program – Environmental Samples, Pages 1-3:** This table indicates that field duplicate samples will be distinguished using a “D” at the end of the sample nomenclature. However, it is recommended that all field duplicate samples be submitted to the laboratory as blind duplicates. Revise the Work Plan to remove the “D” from field duplicate sample nomenclature.
25. **Table 4-1, Ecological Soil Screening Values:** The surface soil screening value listed for zinc, 4.6 mg/kg, cited from the USEPA document Ecological Soil Screening Levels for Zinc (Interim Final) (2007), is incorrect. The correct value from this source is 46 mg/kg. Revise the table to cite the correct value.
26. **Appendix C Summary of Phase 1 RFI Analytical Results:** Several of the “Selected Ecological Surface Soil Screening Values” in Appendix C differ from the ecological soil screening values listed in Table 4-1 of the Work Plan. The lowest-available benchmark for plants, soil invertebrates, avian herbivores, avian ground insectivores, avian carnivores, and mammalian herbivores was selected as the soil screening value for each analyte and presented in Table 4-1. The screening values listed in Appendix C for beryllium, cadmium, chromium, copper, lead, vanadium, and zinc all exceed the values listed in Table 4-1. The selected ecological surface soil screening values used in Appendix C for soil comparison should be the same as those presented in Table 4-1. In addition, ensure that the lowest soil screening value for each analyte is used in the future assessment of soil data from SWMU 70. Amend the text accordingly.



COMMONWEALTH OF PUERTO RICO
OFFICE OF THE GOVERNOR
ENVIRONMENTAL QUALITY BOARD



ENVIRONMENTAL EMERGENCIES RESPONSE AREA

August 17, 2010

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

Re: Review Draft Full RCRA Facility Investigation
Work Plan for SWMU 70 – Disposal Area Northwest of Landfill
Naval Activity Puerto Rico (NAPR), Ceiba
EPA ID No. PR2170027203

(dated June 30, 2010)

Dear Mr. Gordon:

The Hazardous Wastes Permits Division and the Federal Facility Coordinator have finished the review of the above-mentioned document. The document was prepared and submitted by Michael Baker, Jr., Inc. on behalf of the Navy. It was received on July 1, 2010. The purpose of this work plan is to further delineate the environmental impact to media found during the Phase I RFI conducted at SWMU 70.

After a thorough review, several comments were issued. Enclosed please find PREQB's comments to the reviewed work plan. If you have any question or additional comment regarding the matter feel free to contact Gloria M. Toro-Agrait at 787-767-8181 extension 3586 or 787-833-1188 or myself at extension 6141.

Cordially,

Wilmarie Rivera Otero
Federal Facilities Coordinator
Puerto Rico Environmental Quality Board

cc: Gloria M. Toro Agrait – Environmental Permits Officer

Review Full RCRA Facility Investigation Work Plan,
SWMU 70 -- Disposal Area Northwest of Landfill,
EPA I.D. No. PR2170027203
June 30, 2010

I. GENERAL COMMENTS

1. Please note that the readers of the work plan would benefit from a statement regarding the direction of ground water flow (as determined based on the previous ground water level measurements), as well as an indication on one of the figures.

II. PAGE-SPECIFIC COMMENTS

1. Pages 2-1 to 2-2, Section 2.2.1:
 - a. The text of the second bullet states that subsurface soil samples were collected to depths of 15 feet bgs and 5 feet bgs. However, according to the summary of results in Appendix B, both subsurface soil samples were collected from 3-5 feet bgs. Please clarify.
 - b. In paragraph 4, please include a reference to the constituents in the sediment samples exceeding their respective marine sediment screening values. The current lead-in to this section references exceedances of USEPA Region III Residential RBCs for soils or USEPA Region III RBCs for tap water only.
 - c. Subsurface Soil Bullet: Add vanadium to the list of exceedances in subsurface soil. This is in accordance with the results presented in Appendix B for the subsurface soil sample collected at 1.6E-01.
2. Page 2-3, Section 2.2.2:
 - a. Please discuss total metals concentrations in groundwater, as they are used for human health screening purposes.
 - b. In paragraph 4, please specifically identify that the Phase I RFI ground water sample 70SB04 is the one in which the vinyl chloride concentration exceeded the Regional Tap Water SL.
 - c. In paragraph 6, please specify that the two locations in which the cobalt concentrations in surface and/or subsurface soils exceed the Residential RBCs were 70SB02 and 70SB05.
 - d. It would be helpful to consider cobalt concentrations detected in other sediment samples collected in Ensenada Honda as a possible line of evidence for whether cobalt is site-related or within the range of background.
3. Page 3-1, Section 3.1, Bullet 1: The text indicates that a surface soil sample, subsurface soil sample and ground water sample will be collected from soils borings 70SB01, along with the two proposed borings. This regimen for location 70SB01 is not indicated by the symbol/color-coding on Figure 3-1. Is it the intent to re-sample soils adjacent to the existing 70SB01 monitoring well location? Please clarify.

4. Page 3-1, Section 3.1, Bullet 3: Please see the comment above for Bullet 1 in this section -- the same comment applies to the reference to the 70SB04 location.
5. Page 3-1, Section 3.1, Bullet 3: Please consider the addition of VOCs to the analyte list for the soil samples to be collected in the up-gradient direction of location 70SB04. There are two likely scenarios for the detection of vinyl chloride in the ground water at this location: a source in the immediate area that may not have been detected by the original 70SB04 soil samples or migration of impacts in the ground water from a source up-gradient of SWMU 70. Sampling the up-gradient soils for VOCs would shed some light on the likely scenario.
6. Page 3-3, Section 3.2, Bullet 1: Please consider that the more favorable method for well installation would be to install the well materials through the augers, as opposed to into an open borehole. The augers allow for the hole to remain open to the desired depth and allow for the sand pack to be placed under more controlled conditions. The shallow water table conditions in this area that will prevent the placement of a full two feet of sand above the top of the screen dictate the sand pack be placed under very controlled conditions.
7. Page 3-7, Section 3.5.2 and Table 3-2: The text states that polyethylene tubing will be used during the collection of groundwater samples. However, Table 3-2 states that Teflon-lined polyethylene tubing will be used. Polyethylene tubing is not acceptable at wells being sampled for VOCs. Revise the text in Section 3.5.2 to incorporate Teflon-lined tubing for these wells. As per the Region 2 low flow groundwater sampling SOP included in Appendix C of this Work Plan, Teflon or Teflon-lined polyethylene tubing must be used to collect groundwater samples for organic analyses. Polyethylene tubing would be appropriate for inorganic analyses only.
8. Page 4-3, Section 4.6.1.2: Groundwater screening values are proposed for evaluating constituents detected in groundwater samples at the site. Please include the aquatic life criteria presented in the Puerto Rico Water Quality Standards (March 2010) as the preferential screening benchmark source. Please note that metal ambient water quality criteria presented in the Puerto Rico Water Quality Standards are based on total recoverable concentrations of metals.
9. Page 4-8, Section 4.6.2.2: Please also include Puerto Rico's Water Quality Standards Regulation (PRWQS) in this section. Please use the more stringent of either the federal WQS or PRWQS as the enforceable groundwater standard.
10. Page 4-8, Section 4.6.3: Please consider using the EPA's statistical software, ProUCL, to conduct the statistical comparison of site data to background. This

software is published by EPA, and is used at sites in Puerto Rico for conducting statistical analysis.

11. Table 3-1: Sediment samples are proposed to be collected from the surface to three inches. Generally, sediment samples are collected to a depth of six inches unless site-specific characteristics or objectives require a shallower or deeper sampling depth. Please provide the site-specific rationale for collecting sediments to a depth on only three inches at SWMU 70 or revised the table to indicate a surface to six inch sampling depth. Note that all previous sediment samples collected during the Phase I RFI and Phase II ECP Investigation were collected from 0-0.5 feet bgs. In addition, samples 70SD09 through 70SD12 are being used specifically to delineate contamination found at 70SB07 which was collected from 0-0.5 feet bgs.

12. Table 3-3:
 - a. Please revise the method description for the VOC analysis to GC/MS instead of Inductively Coupled Plasma.
 - b. Please include the preparation methods being used for metals in soil, sediment and groundwater samples.
 - c. Groundwater samples from 70GW04, 70GW31, and 70GW32 are being collected for VOCs due to a previous exceedance of a Regional Tap Water Screening Level for vinyl chloride. The current screening level for vinyl chloride is 0.016 ug/L and the quantitation limit (QL) is 1.0 ug/L. Therefore, a more sensitive analytical method (i.e., selective ion monitoring) needs to be used in order to ensure that the project objectives will be achieved.
 - d. The QLs listed for metals in aqueous samples appear very high and more appropriate for analysis via 6010C instead of 6020A. Please verify these QLs with the laboratory and/or procure a laboratory that is capable of reporting lower QLs. Most of the listed QLs appear to be high by about one order of magnitude compared to QLs typically reported by method 6020A. It is important to note that many of the aqueous metals QLs exceed the risk screening levels (ecological groundwater screening levels presented in Table 4-2 as well as the May 2010 EPA Regional Screening Levels [RSLs]) and therefore lower QLs are needed in order to achieve project objectives. Specific exceedance of risk screening levels are as follows:
 - Antimony QL (20) > EPA Tap water RSL (1.5)
 - Arsenic QL (10) > EPA Tap water RSL (0.045)
 - Cadmium QL (5) > EPA Tap Water RSL (1.8)
 - Chromium QL (10) > EPA Tap Water RSL (0.043)
 - Cobalt QL (10) > EPA Tap Water RSL (1.1)

- Vanadium QL (10) > EPA Tap Water RSL (0.26)
- Copper QL (20) > ecological groundwater screening levels (3.73)
- Nickel QL (4) > ecological groundwater screening levels (8.28)
- Silver QL (10) > ecological groundwater screening levels (0.23)

13. Table 4-2: This table references an outdated Puerto Rico Water Quality Standards reference. In addition, the ambient water quality criteria for metals presented in the Puerto Rico Water Quality Standards (March 2010) are based on total recoverable concentrations of metals. Please correct the table accordingly.

Minor Points:

1. Page 3-1, Section 3.1, Bullet 2: Please remove the “s” from the second reference to the word “location” in the first sentence.
2. Page 3-5, Section 3.4, Paragraph 1: Please capitalize the “t” in the first word of the fourth sentence.

REPA4R2-002-ID-202

**EVALUATION OF THE AUGUST 24, 2010, RESPONSE TO EPA COMMENTS
ON THE DRAFT CORRECTIVE MEASURES STUDY INVESTIGATION SWMU 73
DATED FEBRUARY 4, 2010**

**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.
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EPA Task Order No.	002
Contract No.	EP-W-07-018
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September 10, 2010

**EVALUATION OF THE AUGUST 24, 2010, RESPONSE TO EPA COMMENTS
ON THE DRAFT CORRECTIVE MEASURES STUDY INVESTIGATION SWMU**

73

DATED FEBRUARY 4, 2010

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

Response to EPA General Comment 1: The response does not appear to be adequate. While it is understood that the boring for location 73SB24 may have penetrated below the water table before the presence of groundwater was detected, it is unclear why the 17 to 19-foot interval was sampled, as opposed to ten feet below ground surface (bgs), given that the Final Corrective Measures Study Work Plan for SWMU 73 (CMS WP) states that a sample should be collected at a depth shallower than the water table or ten feet bgs, whichever comes first. In addition, the response does not provide a rationale for the collection of a sample at 17 to 19 feet bgs from boring 73SB27. The response indicates that the CMS Investigation (Study Investigation) will be modified to explain how the CMS data collected were sufficient to meet general study objectives. In the revised Study Investigation, ensure that all deviations from the CMS WP are described and the impact on study objectives noted.

Response to EPA General Comment 2: The response does not appear to be adequate. While no low level polynuclear aromatic hydrocarbons (PAHs) were detected in the soil sample collected from seven to nine feet bgs at well 73MW01 (i.e., SB2), collection of a groundwater sample for low level PAHs from this location is still warranted, as it is unknown whether low concentrations of PAHs may be present in the groundwater, with source areas potentially present at locations other than the soil in the vicinity of this well. Also, it should be noted that the reporting limits for PAHs in the semivolatile organic compound (SVOC) groundwater analyses are typically above several groundwater screening levels (defined in the CMS WP as "USEPA Region IX Tap Water PRGs" and the federal Maximum Contaminant Levels and are therefore not necessarily reflective of the potential presence of PAHs. Revise the Study Investigation to explain how the extent of potential PAH contamination in groundwater has been determined in the vicinity of location 19E-03 considering low level PAHs were not analyzed at 73MW01.

In addition, no explanation has been provided as to why the sample collected from 73MW03 was analyzed for select metals and low level PAHs only, as opposed to volatile organic compounds, SVOCs, low level PAHs, and metals, as specified in the CMS WP. Provide an explanation for the deviation from the CMS WP in the revised Study Investigation.

Response to EPA General Comment 7: The response substantially addresses concerns raised in the original comment. However, it is recommended that the revised document

include more information on the 'dilution' potential for the groundwater recharge to Puerca Bay surface water. The hydrologic connectivity between groundwater and surface water must be understood to remove this pathway from further consideration. Also, as mentioned in the response, the nature and extent of the bioaccumulative pesticides needs to be fully described in the revised document to better understand if these chemicals can create an exposure setting to ecological receptors. Ensure that the issues above are addressed in the revised document.

Response to EPA General Comment 14: The response partially addresses the comment. Although NAPR has agreed to evaluate some additional exposure pathways (i.e. ingestion of groundwater by a hypothetical future resident), NAPR has not proposed to evaluate inhalation of dust and vapors by a construction worker and resident as originally requested, and cites EPA's *Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites*, dated 2001 (Soil Screening Guidance), as justification. First, NAPR appears to be citing the peer review draft version of the Soil Screening Guidance, dated 2001, but the final version of the document, dated December 2002, is available and should be cited accordingly. Additionally, the rationale provided for not evaluating the inhalation pathway does not appear to apply to both inhalation of dust and inhalation of outdoor vapors nor does it address the construction worker scenario. The Soil Screening Guidance does provide instances when the fugitive dust exposure route need not be routinely considered for a residential and commercial/industrial scenario, but it also states that the fugitive dust exposure route pathway should be routinely evaluated for hexavalent chromium under a residential and commercial/industrial scenario (Page 4-16). Further, as stated on Page 5-10 of the Soil Screening Guidance, "...due to the potential for increased dust exposure from truck traffic on unpaved roads during construction," EPA recommends that the inhalation of fugitive dusts for the construction scenario be evaluated "for semi-volatile compounds and for all metals." With respect to the inhalation of outdoor vapors pathway, the Soil Screening Guidance states, on Page 4-21, that "EPA recommends evaluating this pathway at sites where volatile contaminants have been detected in subsurface source areas and where the surface soils covering those sources are undisturbed." Revise the human health risk assessment to evaluate the inhalation of outdoor vapors pathway for the future construction worker and resident. Additionally, revise the human health risk assessment to evaluate the inhalation of fugitive dust pathway for the construction worker, and based on the chemicals of potential concern, for the future resident as appropriate.

Response to EPA General Comment 15: The response partially addresses the comment. The response indicates that additional attempts to identify suitable surrogate toxicity reference information will be made and documented; however, the response does not address several additional action items that were also noted in the original comment. Specifically, the comment requested revisions to Table 42. These revisions included defining symbols used in the footnotes, using available toxicity criteria for Aroclor 1248, and including inhalation toxicity criteria in the table. Revise the response to state that these additional action items will be incorporated into the final Study Investigation.

Response to EPA Specific Comment 35: The response partially addresses the comment. The rationale for utilizing StatXact software over ProUCL Version 4.00.04 software was provided, but the response has not provided a complete reference for StatXact, as originally requested. Revise the response to indicate that a complete reference for StatXact will be included in the list of references of the final Study Investigation.

**TECHNICAL REVIEW OF THE
FINAL PHASE I OF THE CORRECTIVE
MEASURES STUDY INVESTIGATION
FOR SWMU 74;
ADDENDUM A – PHASE II OF THE
CMS WORK PLAN FOR SWMU 74**

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

Submitted to:

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Submitted by:

**TechLaw, Inc.
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EPA Task Order No.	002
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September 1, 2010

**TECHNICAL REVIEW OF THE
FINAL PHASE I OF THE CORRECTIVE MEASURES STUDY INVESTIGATION FOR
SWMU 74; ADDENDUM A – PHASE II OF THE CMS WORK PLAN FOR SWMU 74**

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
DATED JULY 2010**

The following comments were generated based on a review of the *Final Phase I of the Corrective Measures Study Investigation for SWMU 74; Addendum A – Phase II of the CMS Work Plan for SWMU 74 (Addendum)*, Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico, dated July 2010.

GENERAL COMMENTS

1. Contingency borings are specified for most of the areas that are to be sampled during Phase II; however, the exact method to be used to locate the contingency borings is not specified. Elaborate on the method to be used to locate the contingency borings. If the contingency borings will be installed as “step-outs” from the proposed boring locations, discuss how far each “step-out” will be and how this distance will be determined. In addition, the Addendum should state that all contingency boring locations will be provided to the regulatory agencies for review and approval prior to implementation.
2. A screening value of 25% of the Puerto Rico Environmental Quality Board (PREQB) total petroleum hydrocarbons (TPH) criteria for soil and groundwater was used in the Phase I investigation to identify areas potentially impacted by the hydrocarbon releases. For the Phase II investigation, the PREQB criteria for TPH in soil and groundwater will be used as the principal criteria to delineate to potential extent of contamination. Explain and justify the use of the higher (400% higher) screening values for the Phase II portion of the investigation as well as the potential for inadequate delineation of contamination as a result of the higher screening values.

SPECIFIC COMMENTS

1. **Airfield Area Investigation, Page A-3:** The second and last bullet points on this page discuss the collection of surface and shallow subsurface soil samples in order to horizontally delineate TPH impacts. If the investigation results indicate PID or other visual/olfactory observations at the bottoms of these borings, then NAPR should consider extending these borings deeper in order to delineate the vertical extent of TPH impacts.
2. **SWMU 9 Area A/B, Page A-4:** The second sentence in the fourth bullet point states that proposed soil borings 74SB582, 74SB584 and 74SB586 will be converted to groundwater monitoring wells; however, Figure 6, Proposed Sample Locations SWMU 9 Area A/B, appears to indicate that proposed soil boring 74SB585, not 74SB586, will be converted to a groundwater monitoring well. Revise either the text or the figure for consistency and to

accurately reflect which boring will actually be converted into a groundwater monitoring well.

3. **JP-5 Hill and DFM Area; Segment A – JP-5 Hill Tank Area, Page A-5:** The first and third bullet points in this section state that no groundwater monitoring wells are proposed for the areas in question because subsurface impacts are shallow. Should the proposed soil samples indicated soil contamination at depths greater than those detected during Phase I activities, additional groundwater monitoring wells will likely be necessary.
4. **JP-5 Hill and DFM Area; Segment A – JP-5 Hill Tank Area, Page A-6:** The first sentence in the last bullet of this section lists five existing monitoring wells (74VP9a/JP5, 74VP11a/JP5, 74VP11b/JP5, 74SB273 and 74SB285) that are to be sampled as part of the Phase II investigation. Figure 8, Phase II Proposed Sample Locations Segment A – JP-5 Hill Tank Area, indicates that six existing monitoring wells will be resampled as part of the Phase II investigation. 74SB139 is the only resampling location shown on Figure 8 that is not listed in the text. Revise either the text or the figure for consistency and to accurately reflect which groundwater monitoring wells will be resampled.
5. **SWMU 9 Area C, Page A-7:** The second sentence in the first bullet states that “two of the borings (74SB738 and 74SB739) will involve construction of groundwater monitoring wells.” For clarity, it is recommended the text be revised to state that “two of the borings will be converted to groundwater monitoring wells.”