



**COMMONWEALTH OF PUERTO RICO
OFFICE OF THE GOVERNOR
ENVIRONMENTAL QUALITY BOARD**

Land Pollution Control Area

May 5, 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 71 – QUARRY DISPOSAL AREA
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. This report presents the results of the field investigation conducted in May and June 2008 following the Revised Final Phase I RCRA Facility Investigation Work Plan approved by EPA on May 13, 2008. Its principal objective is to determine whether contaminants are present from past disposal activities at SWMU 71.

This activity was scheduled as a commitment for the Third Quarter at the FY-08 RCRA Work Plan negotiated between the USEPA and EQB. Only one activity was scheduled for this quarter for this site, hence, it is being submitted as additional work.

Although, EQB concurred with the conclusions and recommendations of the report, there are some comments regarding its content that should be addressed before requiring a Full RFI Work Plan for SWMU 71. Enclosed you will find PREQB's 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,

María V. Rodríguez Muñoz
Manager
Land Pollution Control Program

cc: Ariel Iglesias Portalatín
Wilmarie Rivera, Federal Facilities Coordinator

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***Review Draft Phase I RCRA Facility Investigation Report,
SWMU 71 – Quarry Disposal Site, Naval Activity Puerto Rico,
EPA I.D. No. PR2170027203
March 12, 2009***

Introduction:

This report presents the results of the field investigation conducted in May and June 2008 following the Revised Final Phase I RCRA Facility Investigation Work Plan approved by EPA on May 13, 2008. Its principal objective is to determine whether contaminants are present from past disposal activities at SWMU 71.

The United States Environmental Protection Agency (USEPA) issued Resource Conservation and Recovery Act (RCRA) 7003 Administrative Order on Consent (EPA Docket No. RCRA-02-2007-7301) to NAPR which identified SWMU 71 (formerly referred to as ECP 17) as having documented releases of solid and/or hazardous wastes waste and hazardous constituents.

Comments:

- 1) At page 4-1, the third point indicates that due to the low groundwater volume at 71SB04, the samples from 71GW04 were only analyzed for VOCs, SVOCs, and GRO. This constituted a deviation from the work plan and should be also listed at the end of section 4.0 along with all other deviations. Additionally, the minor deviation number 4 should be justified.
- 2) According to Section 3.4 the Revised Final Phase I RCRA Facility Investigation Work Plan approved by EPA on May 13, 2008, QA/QC samples will be obtained during the investigations. The samples will include Field Blanks, among others. The work plan also specifies that field blank samples consist of the source water used in equipment decontamination procedures. At a minimum, one field blank for each source of water must be collected and analyzed for the same parameters as the related samples. The RFI Report informed at Section 4.8.4 that only one field blank sample (FB01) was collected and adequately explains the reason for it. The field blank was analyzed for the appropriate parameters. Nevertheless, the sample was not taken during the sampling events. According to the summary of the laboratory results the field sample was collected on May 2, 2008. PREQB's interpretation of the procedures at the work plan was that the field blanks were going to be collected during the same conditions that the investigation samples would be collected, hence, on the same date. 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 29 – 31, 2008. Furthermore, according to the RCRA Sampling Procedures Handbook (USEPA 1996) a field blank is similar to the trip

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blank except that it is prepared in the field with laboratory grade distilled water and is prepared exactly as all other samples in the field. The same comment apply for sample number QATB01 that is a trip blank. 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) The chain of custody that includes sample ID 71GW04 was not found at the report.