



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

**Land Pollution Control Area**

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April 30, 2009

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 DRAFT PHASE I RCRA FACILITY INVESTIGATION (RFI)  
REPORT SWMU 78 – POLE YARD  
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 2008 Phase I RFI field investigation for SWMU 78 and serves as the basis for determining the nature of impacts from the potential release of hazardous constituents at the site.

This activity was scheduled as a commitment for the Third Quarter at the FY-08 RCRA Work Plan negotiated between the USEPA and EQB.

Although, EQB concurred with the conclusions and recommendations of the report, there are some comments regarding it content that should be addressed before requiring a Full RFI Work Plan for SWMU 78. 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

**Review Draft Phase I RCRA Facility Investigation Report,  
SWMU 78 – Pole Yard, Naval Activity Puerto Rico,  
EPA I.D. No. PR2170027203,  
February 26, 2009**

**Introduction:**

The document presented the results of the Phase I Resource and Recovery Act (RCRA) Facility Investigation (RFI) report for Solid Waste Management Unit (SWMU) 78 (Pole Yard) at the facility. Baker prepared the report as required by the Navy in accordance with the previously approved RCRA Facility Investigation Work Plan.

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), In accordance with the Consent Order, section VIII, Paragraph 26, SWMU 78 was designated by the USEPA after the discovery of the release of potential hazardous constituents from a transformer storage pad at NAPR and official notification by the Navy. The Final Phase I RCRA Facility Investigation (RFI) Work Plan was approved on May 2008.

**Comments:**

- 1) At page 2-2, the first paragraph indicates that Baker and Navy personnel visited the area of the suspected release on June 15 and 19, respectively. Although it is inferred this sentence should be corrected to include the year that the visits were performed.

The second paragraph of the same page at the last sentence referred to Photograph A-1 in Appendix A to see the “small area (approximately 10 feet by 3 feet) of the stained soil and stressed vegetation was observed at the discharge of the drainage valve” at SWMU78. The photograph that shows the mentioned conditions is identified as A-5 instead of A-1. Please revise and correct.

- 2) According to Section 3.4 the 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 4.6.4 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 was that

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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 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 QATB01 and FB01 was not found at the report. Equipment Rinsate sample ER24 was not include at any of the chain of custodies presented at the report.
  
- 4) The report did not mentioned management of investigation-derived waste (IDW). The approved RFI Work Plan below other field activities, the procedures for the management of IDW. The report should included information regarding IDW, if any were generated.