

N40003.AR.002381
PUERTO RICO NS
5090.3a

DRAFT STATEMENT OF BASIS FOR SOLID WASTE MANAGEMENT UNIT 68 WITH
TRANSMITTAL LETTER NAVAL ACTIVITY PUERTO RICO (DRAFT ACTING AS FINAL)
9/30/2009
RIGHT WAY ENVIRONMENTAL CONTRACTORS

Right Way Environmental Contractors, Inc.
HC 72 Box 3744
Naranjito, P.R. 00719
Phone # 787-857-8832
Fax # 787-857-6068
E-mail : rwec@hughes.net

September 30, 2009

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

Attn: Mr. Adolph Everett, P.E.
Chief, RCRA Programs Branch

Re: Contract N69450-08-R-0093
Corrective Action for SWMUs 14, 56, 68, and 69
Naval Activity Puerto Rico, Ceiba, Puerto Rico
U.S. Naval Activity Puerto Rico (NAPR)
EPA I.D. No. PR2170027203
Draft Statement of Basis for SWMU 68

Dear Mr. Everett:

Right Way Environmental Contractors, Inc. (RWEC), on behalf of the Navy, is pleased to provide you with one hard copy of the Draft Statement of Basis for SWMU 68 in accordance with Section XXVIII of the Consent Order. This document is being submitted in accordance with EPA comments dated August 6, 2009. Additional distribution has been made as indicated below.

If you have questions regarding this submittal, please contact Mr. Mark Davidson at (843) 743-2124.

Sincerely,
Right Way Environmental Contractors, Inc.



Pedro R. Tejada
Vice President

Attachments

cc: Ms. Debbie R. Sanders, BRAC PMO SE (letter only)
Mr. David Criswell, BRAC PMO SE (letter only)
Mr. Mark E. Davidson, BRAC PMO SE (1 hard copy)
Mr. Pedro Ruiz, NAPR (1 hard copy)
Mr. Mark E. Kimes, Michael Baker Jr., Inc. (1 hard copy)
Mr. Tim Gordon, US EPA Region II (1 hard copy)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy)
Mr. Gloria Toro, PR EQB (1 hard copy)
Ms. Willmarie Rivera, PR EQB (1 hard copy)
Mr. Felix Lopez, US F&WS (1 hard copy)
Mr. Anthony Scacifero, TechLaw, Inc. (1 hard copy)

STATEMENT OF BASIS/ PROPOSED FINAL REMEDY DECISION	REGION 2 ID# PR2170027203
---	--------------------------------------

**NAVAL ACTIVITY PUERTO RICO (former Naval Station Roosevelt Roads)
Ceiba, Puerto Rico
(September 19, 2009)**

Facility/unit Type: SWMU 68 - Former Southern Fire Training Area
Contaminants: copper, lead and zinc
Media: surface and shallow subsurface soil (ground surface to approximately two feet below the ground surface)
Proposed Final Remedy: Excavation and off-site disposal of approximately 555 cubic yards of contaminated soil (to a depth of two feet below the ground surface).

FACILITY DESCRIPTION

The USEPA issued a RCRA 7003 Administrative Order (EPA Docket No. RCRA-02-2007-7301) (effective January 29, 2007), which identifies SWMU 68 (formerly referred to as ECP Site 14) – the Former Southern Fire Training Area as having documented releases of solid and/or hazardous waste and hazardous constituents and required additional investigation in the form of a Phase I RFI.

SWMU 68 is located at the southwest end of the Ofstie Airfield adjacent to the Clear Zone off the end of the main runway (see Figure 1). SWMU 68 covers approximately 18 acres of mostly upland habitat; portions of this area include a freshwater wetland classified as Palustrine Emergent Persistent (PEM1) wetland.

The site was first identified through an aerial photography analysis conducted as part of a Phase I Environmental Condition of Property (ECP) Report due to the observation of a circular, graded area with an aircraft fuselage and two stained areas consistent with a fire training area on photographs from 1961 through 1964. Dates of usage of the area are unknown but are suspected to be in the 1950s and 1960s.

Phase I RFI and CMS investigations identified only limited surface soil contamination associated with this site. No previous corrective action activities or interim measures have been conducted at this SWMU.

Ownership of the airfield parcel (Ofstie Airfield) was transferred from the United States Navy to the Puerto Rico Ports Authority on February 7, 2008. The Ports Authority has developed the Ofstie Airfield into a regional airport (operation as a regional airport began in December 2008).

EXPOSURE PATHWAYS

Based on data from the Phase I RFI and CMS investigations, screening of soil and groundwater data from the SWMU did not indicate unacceptable carcinogenic or noncarcinogenic risks to human health.

Exposure pathways for ecological receptors include exposure of terrestrial plants and invertebrates to surface soil and direct dietary intake (ingestion) by terrestrial avian receptors.

SELECTED REMEDY

The goal of the proposed remedy is the removal of contaminated surface soil thereby eliminating potential exposure by terrestrial plant, invertebrate and avian receptors.

The proposed remedy for SWMU 68 consists of the excavation and off-site disposal of approximately 555 cubic yards (CY) of contaminated soil (to a depth of two feet below the ground surface) from two areas at the site (see Figure 2). Approximately 370 CY of lead and zinc contaminated soil will be excavated from the first area; and approximately 185 CY of lead and copper contaminated soil will be excavated from the second area. Samples will be collected from the edge of the excavation to confirm removal of the contaminated soil to below the cleanup goals. The excavated soil will be transported to an on-island, permitted disposal facility. The excavation areas will be backfilled with clean soil, graded and revegetated.

No long term restrictions, controls or monitoring are required with this remedy.

Media	Estimated Volume (CY)	Contaminant	Maximum Concentration (mg/kg)	Clean-up Objective (mg/kg) ⁽¹⁾	Point of Compliance ⁽²⁾
Surface Soil	185	Copper	250	168	Confirmation Samples
	555	Lead	230	87	Confirmation Samples
	370	Zinc	130	120	Confirmation Samples

CY – cubic yards

mg/kg – milligrams per kilogram

(1) – Clean-up objectives are based on surface soil background and on protection of terrestrial plants, invertebrates and avian receptors.

(2) – The point of compliance will be various delineation/confirmation sample locations around the perimeter of the excavations.

The estimated capital cost for implementation of the excavation of contaminated soil and off-site disposal corrective measure is \$298,000. Since contamination will be removed from the site, long-term or operation and maintenance costs are not required.

INNOVATIVE TECHNOLOGIES CONSIDERED

Excavation and off-site disposal of contaminated soil is a presumptive remedy for this SWMU. No innovative technologies were considered.

PUBLIC PARTICIPATION

Public review and comment on the proposed remedy for SWMU 68 will be implemented as required by the Administrative Order on Consent between the Navy and USEPA. A public notice of the public comment period will be published in both Spanish and English in select Puerto Rico newspapers.

NEXT STEPS

Following completion of public review and comment on the proposed remedy, the USEPA will advise of any required modifications based on the public comments, or its acceptability. Following USEPA's approval of the proposed remedy, NAPR will implement the approved remedy.



FIGURE 1
LOCATION MAP
SWMU 68—FORMER SOUTHERN FIRE TRAINING AREA
STATEMENT OF BASIS
NAVAL ACTIVITY PUERTO RICO

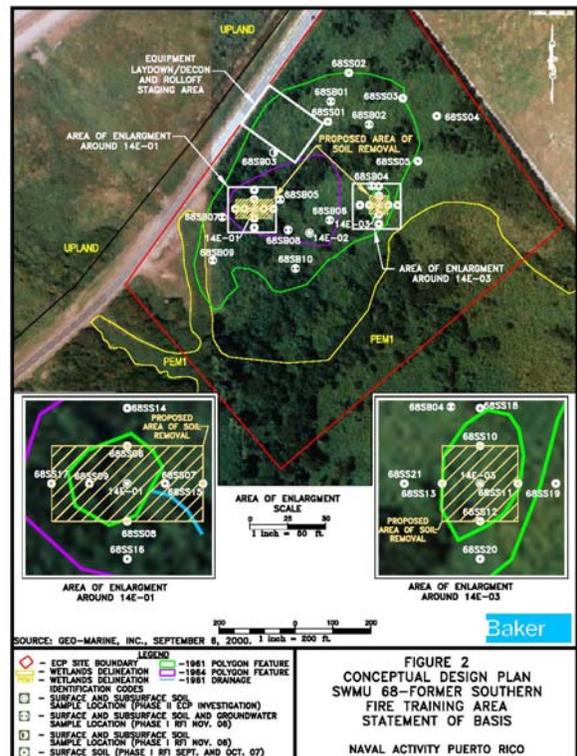


FIGURE 2
CONCEPTUAL DESIGN PLAN
SWMU 68—FORMER SOUTHERN
FIRE TRAINING AREA
STATEMENT OF BASIS
NAVAL ACTIVITY PUERTO RICO

KEY WORDS

Soil, copper, lead, zinc, excavation, off-site disposal, NAPR, SWMU 68

CONTACT

Timothy R. Gordon
USEPA, Region 2
290 Broadway
New York, NY 10007-1866
Phone: (212) 637-4167