

Baker

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June 12, 1997

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

Attn: Ms. Nicoletta DiForte
Chief, Caribbean Section
RCRA Programs Branch

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0173
Final RCRA Facility Investigation Workplans
Addendum 2 - Additional Investigations at OU 1, 6 and 7
Revised Document and Response to Comments
U.S. Naval Station, Roosevelt Roads (NSRR), Puerto Rico

Dear Ms. DiForte:

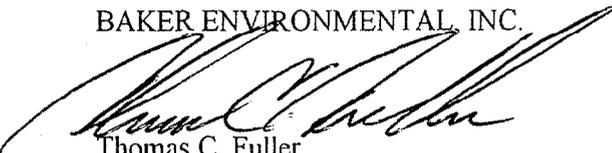
Transmitted under the cover of this letter are three copies of the Revised Final RCRA Facility Investigation Workplans, Addendum 2 - Additional Investigations at OU 1, 6 and 7. This workplan addendum has been revised in accordance with comments provided to the Navy in your April 25, 1997 letter. To summarize the changes made, a formal response to comments summary is attached to this letter.

Revisions to the Draft RCRA Facility Investigation Report for OU 1, 6 and 7 - Addendum 1 (for which comments were also received in the April 25, 1997 letter) have not been completed. The extensive revisions to the Tow Way Fuel Farm report have taken up the time of those people who are most familiar with this site. As discussed with Mr. Gordon of your staff, the Navy desires to submit the revised report July 14, 1997. This window of time also takes into account attendance at the joint interest group meeting in Puerto Rico.

Please do not hesitate to call me at (412) 269-2065 or Mr. Christopher T. Penny, the Navy Technical Representative, at (757) 322-4815, if you have any questions.

Sincerely

BAKER ENVIRONMENTAL, INC.


Thomas C. Fuller
Activity Coordinator

TCF/lq
Attachments

cc: Mr. Christopher T. Penny - LANTDIV - Code 1822 (3 copies)
Mr. Isreal Torres - PREQB (2 copies)
Ms. Madeline Rivera - NSRR (4 copies)
Mr. Jose Negrón - NSRR (1 copy)



A Total Quality Corporation

**Final RCRA Facility Investigation Workplans
Addendum 2
Additional Investigations at OU 1, 6, and 7
Response to Comments**

EPA Comment - Pertains to additional investigations at AOC B and SWMU 2.

Navy Response

The Navy intends to address the EPA's Concerns regarding AOC B/SWMU 6 in their response to comments pertaining to the RFI Report for OU 1, 6 and 7 - Addendum 1.

The Navy recognizes the need for additional sediment sampling in the area of SWMU 2 as recommended in the original report. Page 2-8 of the Addendum report discussed briefly the suggestion that additional sediment sampling be delayed until the completion of the OU 3/5 RFI Report (which includes SWMU 2). The rationale for this is that, at this point, it is unknown whether the apparent contamination indicated in the AOC D information is related to site activities at SWMU 2 or is the result of long-term harbor use. The Navy would like the opportunity to review the SWMU 2 sediment data as it relates to any contamination found within the SWMU. This may allow a similarity or dissimilarity among contaminants to be identified which can be used to guide future sampling efforts. For example, if the constituents found in the sediments appear to match well with those seen in the SWMU, a sampling program concentrating on near shore sediments can be designed. Conversely, should the contaminants appear not to be related to the SWMU, a sampling program concentrating more on offshore sediments may be more applicable.

Based upon the Navy's opinion that the minor delay incurred will be offset by the technical advantages of a focussed approach. The Navy intends to follow this course of action unless there are objections.

A T Kearney Comments

General Comments

The revised workplan addendum contains the corrected and expanded sampling information as detailed in the specific comments.

Navy Response

The response to EPA's comments discusses AOC B/SWMU 6 and sediment sampling at SWMU 2.

SWMU 10 (Substation 2 - Building 90)

Navy Response

The workplan has been emended to reflect the installation of three temporary wells.

The discussion of installation methods has been expanded.

The rationale section has been expanded as requested.

SWMU 26 (Building 544 Area)

Navy Response

Figure 2-2 has been modified to show the background sampling locations.

SWMU 46 (Pole Storage Yard Covered Pad)

Navy Response

Soil samples have been added around the "Contaminated Soil Area" as requested in the comments.

The number of samples has been rectified. The figure has been appropriately modified.

AOCC (Transformer Storage Pads)

Navy Response

The figure has been modified to show the correct number of samples.

AOC D (SWMU 13 and SWMU 11/45)

Navy Response

Total organic carbon has been added as a analyte for sediments.

Page 2-17, Section 2.9.2

Navy Response

The data validation methods contained in Appendix D of the final workplans were deemed unacceptable by EPA and were not approved. Protracted discussions between affected parties led to an approved set of data validation standards which by and large consisted of EPA Region II SOPs. These were SW-846 specific methods provided by Mr. Leon Lazarus of the EPA Edison, NJ laboratory. The Navy agreed to their use and EPA approved by letter. It is these SOPs that are referenced in the text since they are formally a part of the approved workplans which superseded Appendix D.