Baker

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April 22, 2003

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 N62470-95-D-6007
Navy CLEAN, District III
Contract Task Order (CTO) 0034
U.S. Naval Station Roosevelt Roads (NSRR), Puerto Rico
RCRA/HSWA Permit No. PR2170027203
Final Corrective Measures Study Task I Report
Tow Way Fuel Farm (SWMU 7/8)

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with two copies of replacement pages for the Revised Draft Final Corrective Measures Study (CMS) Task I Report, Tow Way Fuel Farm (TWFF) dated January 3, 2003. These replacement pages make up the Final CMS Task I Report for the TWFF. Directions for inserting the replacement pages into the Revised Draft Final CMS Task I Report for the TWFF are provided for your use.

Baker is also providing you, on behalf of the Navy; two copies of cover and spine and inside cover page for the Draft Final Additional Data Collection Investigation Report for the TWFF dated January 3, 2003. It should be noted that this document makes up Appendix E of the CMS Task I Report and has been bound separately for ease of review. These replacement pages make up the Final Additional Data Collection Investigation Report for the TWFF. Directions for inserting the replacement pages into the Draft Final Additional Data Collection Investigation Report for the TWFF are provided for your use.

Baker is also providing you, on behalf of the Navy, with responses to EPA comment letter dated March 13, 2003 on the Navy Responses (January 8, 2003) to EPA comments dated October 24, 2002. This submittal is in accordance with the EPA's letter of March 13, 2003.

If you have questions regarding this submittal, please contact Mr. Kevin Cloe, P.E. at (757) 322-4736. Additional distribution has been made as indicated below.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Mark E. Kimes, P.E.
Activity Manager

MEK/lp
Attachments

cc: Mr. Kevin R. Cloe, LANTDIV - Code EV23KRC (1 copy)
Ms. Madeline Rivera, NSRR (4 copies)
Mr. Tim Gordon, US EPA Region II (2 copies)
Ms. Kathy Rogovin, Booz Allen & Hamilton (1 copy)
Mr. Mace Barron, Booz Allen & Hamilton (1 copy)
Mr. Carl Soderberg, US EPA Caribbean Office (1 copy)
Mr. Carmelo Vazquez, PR EQB (2 copies)
Mr. John Tomik, CH2M Hill Virginia Beach (1 copy)

NAVY RESPONSES TO EPA COMMENTS
DATED MARCH 13, 2003 ON THE
NAVY RESPONSES TO EPA COMMENTS
DATED OCTOBER 24, 2002

BOOZ ALLEN HAMILTON COMMENTS

I GENERAL COMMENTS

1. The response is partially adequate. The issues regarding the screening of technologies have been adequately addressed. However, there remain some concerns regarding the development of remedial alternatives for further study during the Corrective Measures Study (CMS) (see Specific Comment No. 35).

Navy Response to BAH General Comment No. 1

Comment noted. Additional explanation of the development of remedial alternatives is discussed further in Comment No. 35.

2. The response is adequate.

3. The response is adequate.

4. The response is adequate.

II SPECIFIC COMMENTS

2.3.1 Soil Contamination, Page 2-1 1

1. The response is partially adequate. The Naval Station Roosevelt Roads (NSRR) has provided a revised page that refers the reader to Appendix F for historical data, but there is no specific mention of total petroleum hydrocarbon (TPH) data in the text. NSRR should include a sentence that clarifies whether TPH data are available, and specifies the appendix table and figure where these data are presented.

Navy Response to BAH Specific Comment No. 1

This page of the document has been revised to further explain to the reader when the TPH data was obtained, as well as where it can be located within Appendix F.

2.3.3 Surface Water Analytical Results, Page 2-12

2. The response is adequate.

3.7 Step 3a of the Baseline Risk Assessment (Refinement of Conservative Exposure Assumptions), Pages 3-19 to 3-31

3. *The response is adequate. NSRR has provided a convincing argument that the 10 fold dilution factor was adequately conservative and was applied for a limited number of analytes.*

Navy Response to BAH Specific Comment No. 3

No response required.

3.7.1.1.1 Risk Evaluation for Surface Soil, Pages 3-32 to 3-33

4. *The response is partially adequate. NSRR has provided some clarification of background, but has not provided Figure 3-9, cited in the response to comments, to EPA. NSRR should provide Figure 3-9 and should briefly summarize the comparison of site background to the regional background that is referenced by NSRR.*

Navy Response to BAH Specific Comment No. 4

Figure 3-9, which shows the location of base background surface soil samples, has been added to Section 3.0. As discussed in the original response to USEPA comments dated January 8, 2003, site background surface soil samples were not collected at SWMU 7/8. The surface soil background data used in the comparison to site surface soil data were base background data. As such, a comparison of site background surface soil data to regional background surface soil data is not possible.

A comparison of base background surface soil data to Island-wide surface soil data generated by the USGS (1992) was previously presented and discussed in the document entitled Draft Corrective Measures Study Investigation Report for SWMU 9 (Baker 2001). The comparison concluded that the percent contribution (by weight) for many metals in the base background data set were similar to their percent contributions (by weight) in the Island-wide data set. However, as discussed by Baker (2001), the Island-wide background data set was not optimal for comparison primarily due to the analytical methodology employed that resulted in low precision and elevated reporting limits. For additional information, please refer to:

Baker Environmental, Inc. (2001). Draft Corrective Measures Study Investigation Report for SWMU 9, Naval Station Roosevelt Roads, Ceiba, Puerto Rico. July 2, 2001. Coraopolis, Pennsylvania.

U.S. Geological Survey (USGS). 1992. Analytical Results for Stream Sediment and Soil Samples from the Commonwealth of Puerto Rico, Isla de Culebra, and Isla de Vieques. U.S. Department of the Interior, Geological Survey.

3.7.1.3.1 Risk Evaluation for Sediment, Pages 3-36 to 3-38

5. *The response is adequate. While EPA does not agree with the sediment toxicity benchmarks that NSRR has derived for polycyclic aromatic hydrocarbons (PAHs) using the equilibrium partitioning theory, NSRR has provided a convincing argument that individual sediment PAHs do not pose a risk in proximity to the Tow Way Fuel Farm (TWFF). The text and table provided in the response to comments should be included in the final report.*

Navy Response to BAH Specific Comment No. 5

Text provided in the original response to comments dated January 8, 2003 has been added to Section 3.7.1.4.1. This text includes reference to a new table (3-39a), which contains a comparison of maximum and mean PAH sediment concentrations to EqP-based sediment benchmarks derived by Di Toro and McGrath (2000).

Di Toro, D.M. and J.A. McGrath. 2000. Technical basis for Narcotic Chemicals and Polycyclic Aromatic Hydrocarbon Criteria. II. Mixtures and Sediments. Environ. Toxicol. Chem. 19:1971-1982.

6. *The response is adequate.*

3.6.1.5.2 Aquatic Food Web Exposures, Page 3-25

7. *The response is adequate.*

3.7.2 Uncertainties Associated with the Refined Screening-Level Risk Characterization, Pages 3-39 to 3-42

8. *The response is partially adequate. NSRR has provided a qualitative discussion of uncertainty and conservatism in the risk assessment for the manatee. In addition to the discussion, EPA requests that NSRR provide a more quantitative assessment of uncertainty and conservatism for the manatee. Specifically, NSRR should provide upper bound risk estimates for the manatee for a few chemicals (e.g., antimony, other potential risk drivers) in the uncertainty section. The upper bound estimates should be determined using maximum or upper 95% confidence limit values for sediment concentrations and bioaccumulation factors. EPA requests this because of the special status of the manatee and the requirement for protecting individuals rather than populations.*

Navy Response to BAH Specific Comment No. 8

The screening-level risk calculation for aquatic food web exposures (see Section 3.6.1.5.2 and Table 3-25) presented risk estimates for the West Indian manatee using maximum sediment concentrations maximum/high-end BAF/BCF estimates. Section 3.7.2 (page 3-42) has been revised to include the conservative risk estimates for potential ecological COPCs identified in Step 2 of the ERA.

9. *The response is partially adequate. NSRR agrees to include a sediment toxicity benchmark for total PAHs, and states that the screening value is presented in Table 3-11 and the risk results are presented in Tables 3-23 and 3-34. 'The total PAH benchmark and screening results could not be located in Tables 3-11,3-23 and 3-34. Revised Tables 3-11,3-23 and 3-34 should be provided to EPA.*

Navy Response to BAH Specific Comment No. 9

Table 3-11 has been revised to include the total PAH screening value (threshold effect level [TEL] developed by MacDonald [1994]). Tables 3-23 (Step 2 sediment screening table) and 3-34 (Step 3a sediment screening table) have also been revised to include a comparison of maximum and mean total PAH concentrations, respectively, to the total PAH sediment screening value.

Finally, Table 3-26 has also been revised to show that total PAHs were identified as preliminary ecological COPCs in Step 2 of the ERA.

Conclusions and Recommendations, Pages 3-42 to 3-43

10. *The response is adequate.*

11. *The response is adequate.*

12. *The response is adequate.*

Summary of Human Health Risk Assessment and Selection of Contaminants of Potential Concern, Page 4-3

13. *The response is adequate.*

Quantitative CAOs, pages 4-4

14. *The response is adequate.*

Quantitative CAOs, pages 4-5 and 4-6, Target Risk Levels

15. *The response is adequate.*

Table 4-1 Cancer Risks and Hazard Indices from the RFI

16. *The response states that Table 4-1 was proofed and corrected. However, no replacement Table 4-1 was provided. Considering Table 4-1 provides a summary of previous risk assessment results performed for the RFI and not for the CMS, Table 4-1 should be provided to EPA.*

Navy Response to BAH Specific Comment No. 16

Table 4-1 and Table 4-3 were modified to reflect corrections to errors found in original RFI tables. The total residential risk was correct in Table 4-1 but the total adult risk in Table 4-3 was incorrect. The corrected tables were inadvertently left out of the CMS Task 1 report.

Table 4-6 Groundwater Data and COPC Selection Table 4-6

17. *The response is adequate.*

Table 4-10 Summary of Soil-to-Air Volatilization Factor (VF) Calculation

18. *The response is adequate.*

19. *The response is adequate.*

Table 4-12 Summary of Quantitative CAO Calculations, Exposure Via Dermal Absorption of Chemicals of Soil

20. The response is adequate. However, a minor editorial issue remains. The definition of the absorption factor (ABS) parameter at the bottom of Table 4-12 references the reader to Appendix D. The correct reference is Appendix H.

Navy Response to BAH Specific Comment No. 20

The Appendix reference was changed from D to H as noted.

Table 4-16 Determination of Dermal Absorption Factor** (DAJ?) **for Use in Calculating Dermal Absorption of Organic Chemicals from Water

21. The response is adequate.

Table 4-17 Dermal Absorption Factor Parameter Values for Groundwater COPCs

22. The response is adequate.

Table 4-18 Toxicological Data Summary

23. The response is adequate. However, an editorial mistake has been made in the revision of Table 4-18. The inhalation Slope Factor value for ethylbenzene has been put in the column under Unit Risk Factor. The correct toxicity factor has been used in subsequent risk calculations, so this is merely an editorial issue.

Navy Response to BAH Specific Comment No. 23

Table 4-18 was corrected as noted.

Table 4-19 Quantitative Soil CAOs

24. The response is adequate.

4.5.3 Approach to Evaluating Carcinogenic PAHs, page 4-9

25. The response is adequate.

5.0 Identification of COCs, Pages 5-1 to 5-2

26. The response is partially adequate. NSRR has provided some clarification of the Corrective Action Objectives (CAOs), but additional discussion of soil, surface water and sediment is needed in this section of the report. EPA requests this because a number of ecological Contaminants of Potential Concern (COPCs) are identified in the ecological risk assessment, but these do not have CAOs For example, page 3-42 identifies zinc in soil as a COPC and notes that a number of metals have the potential to impact aquatic invertebrate populations. In addition to the uncertainty evaluation in Section 3, Section 5 should provide a brief summary (possibly a table) of the rationale for excluding any ecologcal COPCs from the CAO development. Additionally, the generic statement that "Ecological COPCs had higher CAOs than the equivalent Human Health COPCs" is not adequate. NSRR should provide a quantitative comparison for all chemicals with a CAO.

Navy Response to BAH Specific Comment No. 26

Corrective Action Objectives will not be developed for those ecological COPCs not identified as potential risk drivers. Rational for the exclusion of ecological COPCs as risk drivers is provided in Section 3.0.

Based on the ERA presented in Section 3.0, zinc has been identified as a potential risk driver for surface soil; however, a recommendation to collect additional data was made to determine the spatial extent of zinc contamination downgradient from a hot spot. Until additional samples are collected and the data are evaluated, a surface soil CAO will not be generated. Additional text has been added to Chapter 5 to reflect this fact. Trichloroethene (TCE) has been identified as a potential risk driver for groundwater. The CAO for this VOC was established at 200 µg/L (surface water screening value. The sentence referencing the "Ecological COPCs had higher CAOs than the equivalent Human Health COPCs" has been removed and additional text has been added to correct this statement.

27. The response is adequate.

5.2 Soil COCs, page 5-2

28. The response is adequate.

Table 5-1 Groundwater COCs and CAOs

29. The response is adequate.

Table 5-2 Soil COCs and CAOs

30. The response is adequate.

Table 6-1 Potentially Applicable Corrective Measures Technologies, Soil Matrix

31. The response is adequate.

6.0 Preliminary Corrective Measures Technologies

Table 6-2 Corrective Measures Treatment Technology Descriptions, Soil Matrix

32. The response is adequate.

7.0 Screening of Corrective Measures Technologies

Table 7-1 Treatment Technologies Screening Matrix

33. The response is adequate.

Table 7-2 Applicable Corrective Measure Technologies, Soil Matrix

34. The response is adequate.

8.0 Identification of the Corrective Measures Alternative, Page 8-1

35. *The response is partially adequate. The list of remedial alternatives has been expanded as requested. However, the remedy alternatives are quite complex with five or six different technologies, but there is no explanation as to why these elements were grouped together. The rationale behind some of the groupings is unclear. For example, electro chemical geo oxidation (ECG) is retained as an alternative for soil treatment and groundwater treatment, but in separate alternatives (Alternative 3 for soil and Alternative 5 for groundwater). It would seem more appropriate to include these in the same alternative. Another example is Alternative 4, in which high temperature thermal desorption (HTTD) is proposed for soil that can be excavated and soil vapor extraction (SVE) is proposed for soil that must be treated in-situ. A primary benefit of HTTD is the removal of PAHs, which is a primary weakness of SVE. These do not appear to be a good pairing. Further, justification for the grouping of technologies into alternatives is necessary. Evaluating alternatives for each media (groundwater, phase separated hydrocarbon, and soil) separately, while waiting until the final remedy selection to group them together, should be considered as an alternative to the current approach of formulating complex alternatives addressing all media.*

Navy Response to BAH Specific Comment No. 35

The Stations RCRA/HSWA Permit No. PR2170027203 dated October 20, 1994 Appendix B.III.D directs the Permittee (Navy) to develop corrective measure alternative(s) based on the corrective action objectives and analysis of the Preliminary Corrective Measure Technologies. The Permittee shall rely on engineering practice to determine which of the previously identified technologies appear most suitable for the site. Technologies can be combined to form the overall corrective action alternative(s). The alternative(s) developed should represent a workable number of option(s) that each appear to adequately address all site problems and corrective action objectives. Each alternative may consist of an individual technology or a combination of technologies. The first paragraph of Chapter 8 of the Task I CMS explains this criteria/rationale as directed by Appendix B.III.D of the Stations RCRA/HSWA Permit. Additionally, further discussion of each alternative is provided in Chapter 8 and within Table 8-1which identifies the technology(ies) to be used to address each media (groundwater, soil, and PSH) at the site.

Electro chemical geo oxidation (ECG) technology is available for treatment of groundwater and soil. However, in order to formulate a workable alternative and keep the number of alternatives manageable, it was separated out. This will allow the technology to be evaluated independently for each media, which will be conducted in Task II of the CMS as required by the Stations RCRA/HSWA Permit, Appendix B.IV.

In Alternative 4, high temperature thermal desorption (HTTD) is proposed to address ex-situ soils while using soil vapor extraction (SVE) to address in-situ soils. HTTD appears to be better than SVE for removal of polycyclic aromatic hydrocarbons PAHs within the soils, however some soils may not be accessible and an in-situ option is warranted. In this case, SVE was recommended as a technology option for treating these soils. SVE was recommended so that the maximum number of technologies can be evaluated within the alternatives developed. SVE appears to be weak at addressing PAHs, but further evaluation is necessary. Additionally, the Stations RCRA/HSWA Permit, Appendix B.IV (Task II) is the approved section for the evaluation of alternatives.

Grouping the technologies into alternatives to address the whole site (groundwater, soil, and PSH) will allow NSRR to discuss site-specific complexities associated with each media. Combining the technologies to address each media into a cohesive alternative will also allow NSRR an opportunity to address cross-media concerns.

APPENDIX E ADDITIONAL DATA COLLECTION INVESTIGATION REPORT

GENERAL COMMENTS

36. The response is adequate.

APPENDIX G DRAFT GROUNDWATER MODEL REPORT-TOW WAY FUEL FARM

GENERAL COMMENTS

37. The response is adequate.

SPECIFIC COMMENTS

1.1 Groundwater Modeling Objectives

38. The response is partially adequate. The response acknowledges that, if necessary, various pumping scenarios can be developed using the model for optimization of such a system and that, if necessary, transport modeling could be done using the results of the steady-state groundwater flow model. However, both the response and the revised Appendix G indicate that the pump-and-treat option is not the preferred option developed in the CMS. At this point in the CMS process there should be no preferred option and all options should be treated equally as potential alternatives.

Navy Response to BAH Specific Comment No. 38

The text of Appendix G will be revised to reflect impartiality of any CMS option at this point.

3.2 Model Grid and Boundary Conditions

39. The response is adequate.

3.3 Recharge

40. The response is adequate.

4.1 MODFLOW Results

41. The response is adequate.

42. The response is adequate.

4.2 MODPATH Pathline Analysis

43. *The response is partially adequate. The model has been revised, and much more realistic travel times have been predicted by the pathline analysis. Moreover, the overall calibration of the model does appear to be reasonably good, particularly given the variation in water levels. However, it should be noted that model calibration appears to have resulted in overestimating somewhat the gradient in the lower TWFF area in the vicinity of Ensenada Honda. Consequently, the travel times presented by the model may still be somewhat overestimated. Since the ultimate role of the model has not be defined (see Specific Comment No. 38), the impact of this model error in not clear. The impact of this error on any potential application of the model during the CMS will have to evaluated, and recalibration to emphasize a better match between predicted and observed water level data in the lower TWFF area may have to be considered.*

Navy Response to BAH Specific Comment No. 43

It is noted that the gradient in the lower TWFF as predicted by the model is slightly higher than the observed gradient in the lower TWFF. However, the result of this model error is to underestimate, not overestimate, the travel times. As such, the MODPATH analysis is conservative.

A potential pumping scenario application of the model in the CMS in the lower TWFF will change the groundwater table and gradients that are calculated. A higher gradient will occur around a pumping well and dissolved solutes will flow toward the pumping well according to the new gradients and groundwater heads computed. Should this application of the model occur, a sensitivity analysis of the model for travel times will be done, but recalibration of the model cannot be done because there are no observed groundwater heads under a pumping scenario at this time. The steady state calibration of this model to observed groundwater head is adequate. Text will be added to Appendix G to reflect these statements.

APPENDIX H Corrective Action Objectives (CAO) Calculations

44. *The response is adequate.*

45. *The response is adequate.*

46. *The response is adequate.*

PUERTO RICO ENVIRONMENTAL QUALITY BOARD COMMENTS

1. Section 3.7-Baseline Risk Assessment (Refinement of Conservative Exposure Assumptions), Page 3-31. (Navy comment response number 3).

Figure 3-9 is absent from the document. This figure should show the location of base background surface soil and groundwater sampling locations. Subsequently, the List of Figures obviously has to be replaced.

Navy Response to PREQB Comment No. 1

Figure 3-9 has been added to Section 3.0 and the List of Figures has been revised to show the inclusion of this figure into the document.

2. ***Section 3.7.1.1.1- Risk Evaluation for surface Soil, Pages 3-32 to 3-33 (Navy comment response number 4).***

   The pages 32 @ 33 have not been replaced. The navy response to this comment #4, made reference and mention again the Figure 3-9, which is absent from document.

Navy Response to PREQB Comment No. 2

Please see Navy response to BAH Specific Comment No. 4. As stated in the Navy response to PREQB Comment No. 1 above, Figure 3-9 has been added to Section 3.0. The previous Navy response to comment did not state that Pages 3-32 and 3-33 were replaced. These pages were not modified.

3. ***Section 3.6.1.5.2 Aquatic Food Web Exposures, Page 3-25 (Navy comment response number 7).***

   This section should give the Table 3-25 as a reference. The table provide information of the Hazard Quotients (HQs) for Conservative Food Web Exposures (Aquatic Receptors). Correction should be made in Section 3.6.1.5.2, page 3-25, 3rd sentence. It's not "twelveeleven", the correct number is twelve. This must be clarified to avoid confusion.

Navy Response to PREQB Comment No. 3

Table 3-25 is referenced in Section 3.6.1.5 (Screening-Level Risk Calculation for Food Web Exposures). Given that Section 3.6.1.5 functions as an introduction to Sections 3.6.1.5.1 (Terrestrial Food Web Exposures) and 3.6.1.5.2 (Aquatic Food Web Exposures), there is no need to reference Table 3-25 in Section 3.6.1.5.2.

The text in Section 3.6.1.5.2 (page 3-25, second sentence) has been revised to reflect the number of detected metals with HQ values greater than 1.0.

4. ***Section 3.0, Pages 3-41 and 3-42 (Navy comment response number 9).***

   A comparison of total PAH concentration in Encenada Honda sediment to the total PAH sediment screening value should be in table 3-23 (step 2 sediment screening table), (step 3 sediment screening table) in table 3-34 and the total PAH screening valve in table 3-1 1. Tables 3-11, 3-23, 3-34 apparently has not been revised. Amendments should be provided to USEPA and EQB to approve the document.

Navy Response to PREQB Comment No. 4

Table 3-11 has been revised to include the total PAH screening value (threshold effect level [TEL] developed by MacDonald [1994]). Tables 3-23 (Step 2 sediment screening table) and 3-34 (Step 3a sediment screening table) have also been revised to include a comparison of maximum and mean total PAH concentrations, respectively, to the total PAH sediment screening value. Finally, Table 3-26 has also been revised to show that total PAHs were identified as preliminary ecological COPCs in Step 2 of the ERA.

5. Table 4-1 Cancer Risk and Hazard Indices from the RFI (Navy comment response number 16).

The information on table 4-1 was not appropriately corrected. The NSRR does not clarified the real value of the total hazard index for the future construction worker. This USEPA comment is apparently unanswered.

Navy Response to PREQB Comment No. 5

See response to EPA specific comment 16 above.

6. Table 4-18, Toxicological Data Summary (Navy comment response number 23).

All toxicity values mentioned were updated in table 4-1 8 but not were placed in the correct column. Correction apparently should be made to the position of the Provisional Inhalation Cancer Slope Factor (SF) number that is (3.85 E-02 Kg-d/mg). The Inhalation Unit Risk Factor (URF) for Ethylbenzene is absent in the table. (1.1E- 03 (mg/m^3).

Navy Response to PREQB Comment No. 6

Table 4-18 was corrected as noted.

7. Draft Groundwater Model Report-Tow Way Fuel Farm (Navy comment response number 37).

Groundwater Modeling Report CD not provided.

Navy Response to PREQB Comment No. 7

The groundwater model report CD provided to EPA was to be used for review by their contractor, Booz Allen Hamilton. It contains only the input files used for the MODFLOW simulation. To be of value, it is necessary to run the MODFLOW computer program using these input files, but this program is not provided with the CD. If PREQB has a copy of the MODFLOW program and has a need to run the model and would like to obtain a copy of this CD, please do not hesitate to contact Mark Kimes, the Activity Manager, for a copy.

8. Section 1.1 (Appendix G) Ground Modeling Objectives, Page 1-1 (Navy comment response number 38).

The report does not present the preferred alternatives for the CMS and does not have any reference in the document regarding the matter.

Navy Response to PREQB Comment No. 8

See response to Navy comment No. 38.

9. Section 4.2 MODFLOW results (Navy comment response number 42).

The USEPA comment regarding the sensitivity analysis is apparently not completely answered in all the components. For example: The estimate in the potential error in the computed travel time is absent in the 4.1.1. section.

Navy Response to PREQB Comment No. 9

See response to Navy comment No. 43.