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May 23, 2003

U.S. Environmental Protection Agency – Region II
290 Broadway – 22nd Floor
New York, New York 10007-1866Attn: Mr. Adolph Everett, P.E.
Chief, RCRA Programs BranchRe: 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)

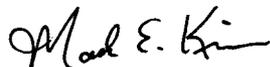
Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with two copies of replacement pages for the Final Corrective Measures Study (CMS) Task I Report, Tow Way Fuel Farm (TWFF) dated April 22, 2003. These replacement pages reflect the agreement made between the EPA and Navy on May 15, 2003 during a conference call with Mr. Tim Gordon of your office. 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; with a revision to the Navy Responses to EPA Comment No. 35 dated April 22, 2003. This submittal is in accordance with the EPA's request during the May 15, 2003 conference call.

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 Managerpcl
Attachmentscc: 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)**Challenge US.**

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

BOOZ ALLEN HAMILTON COMMENTS

II SPECIFIC COMMENTS

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 Revised Response to BAH Specific Comment No. 35

The Navy has combined the screened process options into workable alternatives that address all contaminants of concern in each media for the entire site. During the upcoming evaluation process (Tasks II, III, and IV), each alternative will be evaluated against the criteria identified in the Part B permit. After the evaluation process, if it becomes apparent that an alternative would be more acceptable if a process option was removed and/or replaced, the alternative could be adjusted as necessary.

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 8-1 which 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.