

Baker

Baker Environmental, Inc.
A Unit of Michael Baker Corporation

November 22, 2005

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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) 0268
U.S. Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico
RCRA/HSWA Permit No. PR2170027203
Revised Final CMS Final Report Tow Way Fuel Farm

Dear Mr. Everett:

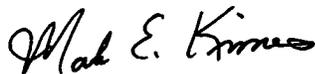
Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with two copies of the replacement cover and spine, inside cover, text, tables, figures, and appendices for the Final CMS Final Report for Tow Way Fuel Farm dated August 29, 2005. These replacement pages make up the Revised Final CMS Final Report for Tow Way Fuel Farm. Directions for inserting the replacement pages into the Final CMS Final Report for Tow Way Fuel Farm are provided for your use. Also included with the replacement pages are two electronic copies provided on CD of the Revised Final CMS Final Report for Tow Way Fuel Farm.

This document is submitted in accordance with the EPA letter dated October 13, 2005. This document incorporates all the necessary changes outlined in the attached Navy responses to your October 13, 2005 comments.

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, NAVFAC Atlantic - Code OPCEV5 (1 hard copy and 1 CD)
Ms. Rochelle Lee, NAVFAC Atlantic – Code OPCAQ5 (letter only)
Ms. Bonnie P. Capito, NAVFAC Atlantic – Code EV31LR (1 hard copy)
Ms. Madeline Rivera, NAPR (4 hard copies and 1 CD)
Mr. Tim Gordon, US EPA Region II (2 hard copies and 2 CD)
Ms. Kathy Rogovin, Booz Allen & Hamilton (1 hard copy and 1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy and 1 CD)
Mr. Manny Vargas, PR EQB (2 hard copies and 1 CD)
Ms. Janna Staszak, CH2M Hill Virginia Beach (1 hard copy and 1 CD)

ChallengeUs.

**NAVY RESPONSE TO EPA COMMENTS DATED OCTOBER 13, 2005 ON THE FINAL
CMS FINAL REPORT FOR SWMUs 54 AND 55 DATED AUGUST 29, 2005 AND THE
FINAL CMS FINAL REPORT TOW WAY FUEL FARM DATED AUGUST 29, 2005**

EPA REGION II COMMENT

SWMU 54 and 55 Corrective Measures Study CMS Final Report

Based on our review of the Navy's April 8, 2005 responses to EPA's January 7, 2005 comments and the August 29, 2005 revised CMS Final Report for SWMU 54 and 55, EPA has determined that the CMS Final Report is acceptable. However, since the proposed remedies for both SWMUs (enhanced bio-remediation for dissolved TCE in the groundwater at both SWMUs, plus, at SWMU 54, dissolved benzene in the groundwater) involve an element of pilot-testing before the exact remedial measures are defined, this acceptance of the CMS Final Report is conditional upon:

- a) completion of all proposed pilot-testing; and
- b) following completion of such pilot-testing, EPA's review and approval of a Corrective Measures Implementation (CMI) plan for both SWMUs, giving exact details as to how the selected remedial measures will be implemented.

In addition, as EPA has previously advised the Navy, the selected remedies must undergo public review and comment (pursuant to Condition III.E.9 of the facility's 1994 RCRA permit).

Navy Response to EPA Comment

Comment Noted.

EPA REGION II COMMENT

Tow Way Fuel Farm (SWMUs 7 & 8) CMS Final Report

Based on our review of the Navy's April 8, 2005 Responses to EPA's January 7, 2005 Comments and the August 29, 2005 revised Corrective Measures Study (CMS) Final Report for Tow Way Fuel Farm (SWMUs 7 and 8), EPA has determined that the August 29, 2005 CMS Final Report is largely acceptable; however, several limited issues remain, which are discussed in the enclosed Technical Review. Since addressing those remaining issues may not alter the overall scope of the recommended remedy for Tow Way Fuel Farm, rather than re-submitting the entire CMS Final Report, please submit, within 45 days of your receipt of this letter, an addendum to the August 29' CMS Final Report addressing the issues discussed in the enclosed Technical Review.

If following submission of the addendum, EPA finds it is acceptable and does not alter the overall scope of the recommended remedies for Tow Way Fuel Farm, then pursuant to Condition III.E.9 of the RCRA permit, the revised CMS Final Report, modified to incorporate any changes per the addendum, must undergo public review and comment before being fully approved by EPA.

In addition, as described in the CMS Final Report, following two years of operation of the passive skimming system for the phase separated hydrocarbon (PSH, a/k/a "free product") recovery, the

Navy will submit to EPA an Engineering Evaluation Report (EER) addressing the effectiveness of the PSH and groundwater remedies. Therefore, EPA's acceptance of the PSH and groundwater remedies recommended in the CMS Report will also be conditional upon:

- a) results of the EER indicating that the proposed remedial measures are effectively addressing the PSH and groundwater; and
- b) EPA's review and approval of any revisions to the selected remedial measures based on the EER.

Navy Response to EPA Comment

Comment Noted.

Public Review of the Selected Remedies

As EPA has previously advised, pursuant to Condition H.I.E.9 of the facility's 1994 RCRA permit, the selected remedies must undergo public review and comment before being fully approved by EPA. Also as previously discussed with Navy representatives, completion of such public review on the final remedies recommended for several of the SWMUs at NAPR, including SWMUs 54 and 55 and Tow Way Fuel Farm, may be deferred, pending implementation of such public review as part of the public review of the RCRA Order on consent, currently being developed for completing corrective action at the NAPR facility.

Navy Response to EPA Comment

Comment Noted.

**BAH TECHNICAL REVIEW OF THE AUGUST 29, 2005
FINAL CMS FINAL REPORT FOR TOW WAY FUEL FARM
NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO**

BAH Comment #1

1. In response to EPA's April 8, 2005, Comments a and d, the Navy committed to performing a full evaluation of monitored natural attenuation (MNA) prior to implementation of any alternative in which MNA is included. This MNA evaluation will address items in OSWFR Directive 9200.4-17 for the use of MNA at Resource Conservation and Recovery Act (RCRA) and Superfund Sites. This commitment is reflected in the Technical Performance discussion of Alternative 1 for the Tow Way Fuel Farm (TWFF) (Section 2.2.1.1), but has not been included in the description of the other four TWFF alternatives (each of which also include MNA as a remedial component). Because Alternative 1 is the recommended corrective measures alternative for the TWFF, this issue should not present ongoing concerns. However, the Navy should be aware that the same MNA evaluation will be required if another corrective measures option is ultimately selected for the TWFF.

Navy Response to BAH Comment #1

The sentence: "An MNA evaluation would be performed at the TWFF prior to implementation of this remedy" will be added to each alternative under Technical, Performance, similar to that given in Alternative 1. The costs associated with an MNA evaluation were already incorporated into the total alternative costs.

BAH Comment #2

2. In response to EPA's April 8, 2005, General Comment 4, the Navy indicated that pump testing will be performed before startup of any active groundwater corrective measures system to determine well quantities and spacing. However, no reference to pump testing appears to be included in the Final Corrective Measures Study (CMS) Report for TWFF. Pump testing should be included in the Final CMS Report as a necessary step in designing a proper corrective measures program for active groundwater treatment alternatives.

Navy Response to BAH Comment #2

A reference to pump testing has been added to Alternatives 2 and 3 under the implementation section.

BAH Comment #3

3. In response to several EPA comments on the Draft CMS Report for the TWFF, the Navy proposed full implementation of the passive skimming alternative. After two years of data have been obtained from the fully implemented system, the Navy will prepare and submit an Engineering Evaluation Report (EER) to assess the effectiveness of this technology or other remedial components in achieving corrective action objectives for phase separated hydrocarbons (PSH). Accordingly, Figure 3-1 has been updated to include development of the EER. As presented, EER assessment activities are scheduled to begin two years after initiation of corrective measures design. However, the report text and schedule are unclear as to when full-scale passive skimming activities will actually begin (i.e., this could possibly be as late as system "startup" in month 23). Thus, it cannot be determined whether EER activities have been properly scheduled. For clarification, it is recommended that the Navy provide a more detailed proposed schedule for the recommended corrective measures alternative; the schedule should include a breakdown of specific construction tasks for soil, groundwater, and PSH.

Navy Response to BAH Comment #3

The schedule shown in Figure 3-1 has been changed to reflect implementation of the construction activities associated with the corrective measures applicable to the different media at TWFF. The EER will be performed after two years of operational time of the PSH Skimming alternative.