



Baker Environmental, Inc.
A Unit of Michael Baker Corporation

Airside Business Park
100 Airside Drive
Moon Township, PA 15108

Office: 412-269-6300
Fax: 412-375-3995

December 29, 2005

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) 099
U.S. Naval Activity Puerto Rico (NAPR)
Revised Final RCRA Facility Investigation Work Plan for SWMU 14
RCRA/HSWA Permit No. PR2170027203

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is pleased to provide you with two copies of the replacement cover and spine, inside cover, text, and figures for the Final RCRA Facility Investigation Work Plan for SWMU 14 dated November 10, 2005. These replacement pages make up the Revised Final RCRA Facility Investigation Work Plan for SWMU 14. Directions for inserting the replacement pages into the Final RCRA Facility Investigation Work Plan for SWMU 14 are provided for your use. Also included with the replacement pages are two electronic copies provided on CD of the Revised Final RCRA Facility Investigation Work Plan for SWMU 14.

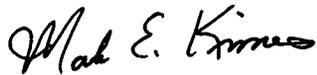
This document is submitted in accordance with the EPA letter dated December 5, 2005. The Navy responses to your comment dated December 5, 2005 are also attached.

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

**NAVY RESPONSE TO EPA COMMENTS DATED DECEMBER 12, 2005 ON THE SWMU 14
FINAL RCRA FACILITY INVESTIGATION (RFI) WORK PLAN
DATED NOVEMBER 10, 2005**

EPA REGION II COMMENT

SWMU 14 - Response to Comments and RFI Work Plan

The November 2005 Final RFI work plan is largely acceptable. However, prior to EPA's final approval as discussed in the enclosed Technical Review, several items need to be clarified with regard to the 1995 Health and Safety Plan (HASP), the Schedule, and several editorial type issues (refer to BAH General Comment 1). These items maybe addressed in a supplemental Response to Comments and/or addendum to the work plan. Please submit that supplemental Response and/or addendum to the work plan, addressing all comments in the enclosed Technical Review, within 25 days of your receipt of this letter.

Navy Response to EPA Region II Comment

Please see the Navy responses to BAH Technical Review below.

**BAH TECHNICAL REVIEW OF THE
FINAL RCRA FACILITY INVESTIGATION WORK PLAN FOR SWMU 14
FIRE TRAINING PIT AREA
NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO**

EPA COMMENT

1. The response to this comment is partially acceptable in that the RFI Work Plan now makes specific reference to Health and Safety Plan (HASP) prepared in 1995. However, in this comment, EPA also requested confirmation that the 1995 HASP: a) addresses all potential exposures at Solid Waste Management Unit (SWMU) 14; b) reflects current site conditions at the NAPR facility; and c) complies with all currently applicable Occupational Safety and Health Administration (OSHA) requirements. Although Section 2.3 of the Work Plan has been revised to reference the 1995 HASP, the text only indicates that this HASP is "still relevant". More definitive and detailed language should be provided with respect to EPA's above referenced concerns.

Navy Response to EPA Comment #1

The language to be added to the fourth paragraph of Section 2.3 is as follows and shown in **Bold type**:

Project Plans were developed and approved by the EPA to conduct the Phase I RFI for SWMU 14. The Final RCRA Facility Investigation document dated 9/14/1995 contains the entire set of project plans including a Project Management Plan, Data Collection Quality Assurance Plan, and the Health and Safety Plan (Baker, 1995). These project plans are referenced and still relevant for the performance of the work described in this work plan. **This Health and Safety Plan addresses all potential exposures at SWMU 14 and reflects the current site conditions at the facility. The only changes at this site since the original RFI work was conducted in March of 1996 is that the facility is closed and no longer in use for fire training. This document also complies with applicable Occupational Safety and Health Administration requirements.**

BAH GENERAL COMMENTS

1. The response to this comment is largely acceptable, however several minor omissions and errors were noted in the response and/or the revised Work Plan text and figures.
 - The legend for Figure 3-1 should be revised to indicate that only the sampling locations shown in red are proposed for this portion of the investigation. Sampling locations shown in orange were completed in 1995 and 1996.
 - In accordance with the expanded scope of investigation, the first paragraph in Section 3.2 should be expanded to note that a temporary well will also be installed at the Temporary Fire Training Pit location.
 - The rationale for the proposed sampling locations is provided in Section 12 of the Work Plan, rather than Section 1. 1, as stated in the response.

Navy Response to BAH General Comment #1

The word "PROPOSED" will be added before "SOIL SAMPLE LOCATION" in the legend for the red sample locations. The word "PROPOSED" will be deleted from the description in the legend for the orange sample locations.

The first paragraph in Section 3.2 will be modified as follows. The modifications are presented in **Bold type**.

Two temporary wells will be installed in three of the six soil borings from the original/current pit location to characterize the groundwater potentially affected by activities at the Fire Training Pit. The location of these wells will be determined based on the findings from the subsurface soil sampling effort. A third temporary well will be installed in the boring located within the temporary pit location used in 1983.

Comment noted.

2. The response to this comment is acceptable.
3. The response to this comment is acceptable. However, after analyses are completed, NAPR should review actual quantitation limits calculated by the laboratory to be sure that they are sufficiently low (i.e., below applicable human health risk-based concentrations or ecological screening criteria). If not, an evaluation of those constituents should be conducted to assess whether they are actually present at levels of concern, and associated discussion should be provided in the RFI Report.

Navy Response to BAH General Comment #3

Comment noted.

BAH SPECIFIC COMMENTS

Section 1.0, Introduction

1. The response to this comment is acceptable.

Section 2.3, Previous Investigations

2. The response to this comment is acceptable.

Section 3.5.2, Investigation Derived Waste (IDW)

3. The response to this comment is acceptable.

Section 3.5.3, Decontamination

4. The response to this comment is acceptable.

Section 4.0, Reporting

5. The response to this comment is acceptable.

Section 5.2.2, Data Summary

6. The response to this comment is acceptable.
7. The response to this comment is acceptable.

Section 5.2.3, Identifying Chemicals of Potential Concern

8. The response to this comment is acceptable.

Section 7.0, Schedule

9. The response to this comment is acceptable, but there appears to be a significant error on the revised schedule. According to Figure 7-1, field work (Task 9) will commence on January 5, 2006, but the field investigation (Subtask 10) will not begin until February 1, 2006. Because no explanation is provided for the delay, and the mobilization effort should not be significant, this discrepancy appears to be a simple typographical error. Accordingly, the schedule should be revised to also show subtask 10 beginning on January 5, 2006, as the first component of Task 9.

Navy Response to BAH Specific Comment #9

Comment noted. There is not a significant error on the schedule. Task 9 is labeled "Initiate Field Work" not "Field Work". Task 9 Initiate Field Work has duration of 60 days in accordance with Module III.E.2 of the RCRA Part B Permit. This task reflects the period of time in which the field work needs to be initiated. The start date for Task 10 Field Investigation falls within the period listed in Task 9. To avoid confusion Task 9 will be deleted from the schedule. Therefore no other changes to the dates on the schedule are required. It should be noted that the dates provided in the schedule are dependant upon EPA approval of the RFI Work Plan.

10. The response to this comment is acceptable.

Section 8.1, Project Team Responsibilities

11. The response to this comment is acceptable.

Table 3-2, Method Performance Limits

12. The response to this comment is acceptable.

PREQB COMMENTS

13. The response to this comment is acceptable.

14. See the response to EPA Comment 1 above.

Navy Response to PR EQB Comment

See the Navy Response to EPA Comment #1 above.

15. The response to this comment is acceptable.