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March 4, 2011

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

Attn: Mr. Adolf Everett, P.E.
Chief, RCRA Programs Branch

Re: Contract N62470-10-D-3000
IQC for A/E Services for Multi-Media
Environmental Compliance Engineering Support
Delivery Order (DO) 0002
U.S. Naval Activity Puerto Rico (NAPR)
EPA I.D. No. PR2170027203
Final Corrective Measures Study Work Plan and Addendum A, Phase II Investigation
Work Plan for SWMU 74

Dear Mr. Everett:

Michael Baker, Jr., Inc. (Baker), on behalf of the Navy, is pleased to provide you with one hard copy of the replacement pages for the response to EPA comments and one electronic copy, provided on CD, of the above-reference document. We are resubmitting Addendum A with a revised date on all of the pages, as requested. The project schedule (Figure 9-1) for the Work Plan also has been updated to reflect the work to be conducted during Phase II of the CMS Investigation. Since the EPA comments and associated responses are administrative/editorial rather than technical, and to maintain the attached schedule, we request an expedited review and approval of this submittal.

Additional distribution has been made as indicated below. If you have questions regarding this submittal, please contact Mr. Mark Davidson at (843) 743-2124.

Sincerely,

MICHAEL BAKER JR., INC.

A handwritten signature in black ink that reads "Mark E. Kimes". The signature is written in a cursive, flowing style.

Mark E. Kimes, P.E.
Activity Coordinator

MEK/vk
Attachments

cc: Ms. Debra Evans-Ripley, BRAC PMO SE (letter only)
Mr. David Criswell, BRAC PMO SE (letter only)
Mr. Mark E. Davidson, BRAC PMO SE (1 hard copy and 1 CD)
Mr. Pedro Ruiz, NAPR (1 CD)
Mr. Tim Gordon, USEPA Region II (1 hard copy and 1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy and 1 CD)
Ms. Bonnie Capito, NAVFAC Atlantic–Code EV42 (1 hard copy for the Administrative Record)
Mr. Felix Lopez, US F&WS (1 CD)
Ms. Brenda Smith, TechLaw, Inc. (1 CD)
Ms. Wilmarie Rivera, PREQB (1 CD)
Ms. Gloria Toro, PREQB (1 hard copy and 1 CD)

**NAVY RESPONSE TO EPA COMMENTS DATED FEBRUARY 9, 2011
ON THE FINAL CMS WORK PLAN AND ADDENDUM A, PHASE II INVESTIGATION
WORK PLAN FOR SWMU 74 – FUEL PIPELINE AND HYDRANT PITS
DATED OCTOBER 21, 2011**

(EPA comments are provided in italics while Navy responses are provided in regular print.)

EPA Comments dated February 9, 2011

***EPA Comment 1:** Although the title page of the CMS Work Plan and the Navy certification are dated October 21, 2010, most of the pages of the document indicate they were “Revised: December 6, 2007”. Any pages, figures, or tables in the document revised subsequent to then, need to reflect the date of the most current submittal, including the pages of Addendum A Phase II of the CMS Work Plan.*

Navy Response to EPA Comment 1: The only revisions to the CMS Work Plan subsequent to December 6, 2007 are the Cover, Signature Page, the schedule (as discussed in the following comment) and the addition of Addendum A. Headers will be added to the Addendum A text and tables to reflect the current date of submission (March 4, 2011).

***EPA Comment 2:** Section 9.0 (Schedule) indicates that “A schedule for the implementation of this work plan, and follow-up reports for the CMS reports is provided as Figure 9-1. However, the included Figure 9-1 shows a proposed implementation schedule covering June 2007 through May 2010, and is indicated as “Revised: December 6, 2007”. The schedule needs to be revised and updated to reflect all activities proposed as part of Addendum A Phase II of the CMS Work Plan.*

Navy Response to EPA Comment 2: Figure 9-1, the project schedule has been revised to reflect the activities proposed as part of Addendum A, Phase II of the CMS Work Plan. The date of Figure 9-1 also has been revised to reflect the March 4, 2011 submission.

***EPA Comment 3:** Please note that the adequacy and acceptability of any contingency borings which are installed as part of Addendum A Phase II of the CMS Work Plan at locations which are not previously reviewed and approved by EPA, will be subject to EPA’s acceptance as part of its review and approval of the Phase II CMS Investigation Reports (see page A-8) of Addendum A, when developed.*

Navy Response to EPA Comment 3: As indicated by this comment, it is noted that the adequacy and acceptability of any contingency borings installed as part of Phase II of the CMS Investigation for SWMU 74, which are not previously reviewed and approved by EPA will be subject to EPA’s acceptance as part of its review and approval of the Phase II CMS Investigation Reports.