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April 23, 2010

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

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

Re: Contract N69450-08-C-0093
Corrective Action for SWMUs 14, 56, 68 and 69
Naval Activity Puerto Rico, Ceiba, Puerto Rico
U.S. Naval Activity Puerto Rico (NAPR)
EPA I.D. No. PR2170027203
Functional Assessment and Supplemental Sediment Sampling Report
for the Drainage Ditch Downgradient from SWMU 56

Dear Mr. Everett:

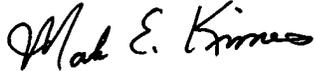
Michael Baker, Jr., Inc. (Baker), on behalf of the Navy, is pleased to provide you with one hard copy of the Response to USEPA comments and proposed project schedule for the Functional Assessment and Supplemental Sediment Sampling Report for the Drainage Ditch Downgradient from SWMU 56, Naval Activity Puerto Rico.

This document is being submitted in accordance with EPA comments dated February 18, 2010.

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

Sincerely,

MICHAEL BAKER JR., INC.



Mark E. Kimes, P.E.
Activity Coordinator

MEK/lp
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)
Mr. Pedro Ruiz, NAPR (1 hard copy)
Mr. Timothy Gordon, EPA Region II (1 hard copy)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy)
Mr. Felix Lopez, US F&WS (1 hard copy)
Mr. Jonathan Flewelling, TechLaw, Inc. (1 hard copy)
Ms. Wilmarie Rivera, PREQB (1 hard copy)
Ms. Gloria Toro, PREQB (1 hard copy)

NAVY RESPONSE TO EPA COMMENTS DATED FEBRUARY 18, 2010

FUNCTIONAL ASSESSMENT AND SUPPLEMENTAL SEDIMENT SAMPLING REPORT FOR THE DRAINAGE DITCH DOWNGRADIENT FROM SWMU 56 (DATED DECEMBER 3, 2009)

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

EPA COMMENT

EPA has completed its review of the above report, which represents an interim report on the evaluation of whether or not the adjacent drainage ditches have been impacted by releases from SWMU 56. The need for and scope for such an evaluation was discussed at the October 30, 2008 meeting between EPA, the Navy, the PR Environmental Quality Board (PREQB) and their respective consultants, as memorialized in meeting notes distributed by EPA to the Navy, PREQB and their respective consultants via Email from myself on November 20, 2008. EPA and PREQB had given their concurrence to the proposed sample locations as shown in a table and figure distributed via Email dated May 20, 2009 sent by Mark Kimes (of Baker Environmental) on behalf of the Navy. The December 3, 2009 interim report indicates that "The Functional assessment and drainage ditch analytical data will be incorporated into the ecological risk assessment (ERA) previously presented within the draft CMS for the SWMU." EPA concurs. Therefore, within 60 days of your receipt of this letter please submit a work plan and a schedule for both completing the ERA and the Corrective Measures Study (CMS) for SWMU 56 and the adjacent drainage ditches. The schedule for completing the ERA and CMS must also be coordinated with your proposal for completing the evaluation of whether or not Building 207, adjacent to SWMU 56, should either be identified as new area to be investigated under requirements of the Consent Order, or included within the definition of areas impacted by releases from SWMU 56, as discussed below.

Navy Response: The Navy offers the following points of clarification relative to this comment. A CMS Work Plan (dated December 6, 2007) for SWMU 56 has previously been submitted and approved by the EPA. A draft CMS Report (September 26, 2009) also was prepared and submitted to the EPA and PREQB. The EPA and PREQB submitted comments on the Draft CMS Report (dated January 15, 2009). However, the Draft CMS Report was retracted in a letter dated December 3, 2009 from Baker, on behalf of the Navy, to the EPA because of soil disturbance activities within the SWMU by the Puerto Rico Ports Authority. The soil disturbance issue between the Navy and Puerto Rico Ports Authority has since been resolved and additional sampling at SWMU 56 is not necessary since soil activities did not impact previous soil sampling locations. Therefore, it is the Navy's intention to revise the retracted CMS by incorporating the following:

- Information presented within the Functional Assessment and Supplemental Sediment Sampling Report
- Responses to EPA and PREQB comments dated January 15, 2009
- The newly established airfield background soil data set and freshwater drainage ditch data set (Addendums B and C of the *Revised Final II Summary Report for Environmental Background Concentrations of Inorganic Compounds* dated February 29, 2008).

Therefore, the Navy does not believe it is necessary to submit a work plan for completing the ERA and CMS.

A schedule for completing the CMS is attached to this response to comments letter. It is noted that the attached schedule is dependent on EPA and PREQB approval of the newly established airfield background soil and freshwater drainage ditch data sets. Draft addendums were submitted to the EPA and PREQB on January 6, 2010. EPA and PREQB comments on each addendum were provided to the Navy on March 11, 2009. Navy responses and revised addendums are scheduled for submittal to the EPA and PREQB on April 29, 2010. As evidenced by the schedule, the Navy anticipates that a Draft CMS Report with the revisions noted within the bullet items above will be submitted to the EPA and PREQB on August 1, 2010. Again, this date is dependent on EPA and PREQB approval of the Addendum B and C data sets.

With regard to the Site 56A (Building 207), it is the Navy's intention to designate this area as a new SWMU or Area of Concern. This intention also has been incorporated into the April 23, 2010 Navy Responses to EPA and PREQB comments on the SWMU 56/Site 56A Source Area Investigation Report.

SWMU 56 CMS Project Schedule

