

01.01-09/27/96 00455



**DEPARTMENT OF THE NAVY**  
U. S. NAVAL STATION, ROOSEVELT ROADS  
PSC 1008 BOX 3001  
FPO AA 34051-0001

5090  
Ser N02C-B13 3600

27 SEP 1996

U.S. Environmental Protection Agency  
Region II  
Attn: Raymond Basso,  
Chief, RCRA Program Branch  
290 Broadway, 22nd Floor  
New York, NY 10007-1866

Gentlemen:

In response to your letter of September 13, 1996 and as discussed during the telephone conference of September 17, 1996 with participation from your agency; Baker Environmental, Inc.; Blasland, Bouck, and Lee, Inc.; Atlantic Division, Naval Facilities Engineering Command Code 182; and our personnel, the requested information will be forwarded to you by Baker Environmental, Inc. under separate correspondence.

Should you have any other questions, please contact Mrs. Madeline Rivera, or Mr. Pedro Ruiz from the Environmental Engineering Division, at (787) 865-4429. Also, please let me know if the information provided fails to address your concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. J. Pena".

S. J. PENA  
Commander, CEC, U.S. Navy  
Public Works Officer  
By direction of the  
Commanding Officer

5090

Ser N02C-B13/13600

27 SEP 1996

Copy to:  
Baker Environmental, Inc.  
Airport Office Park, Building 3  
429 Rouser Road  
Coraopolis, PA 15108

Environmental Quality Board  
Attn: Mr. Israel Torres  
Land Pollution Control  
RCRA Section  
P.O. Box 11488  
Santurce, PR 00910

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 182  
1510 Gilbert Street  
Norfolk, VA 23511.

## **COMMENT RESPONSE**

The following provides detailed responses to the comments transmitted in EPA's letter of December 6, 1995. Please note that the responses are provided using the same numbering system employed in the comment letter.

### **Comment 1**

The Navy recognizes that there are discrepancies between the two figures and, for this reason, the text has been structured in such a way as to describe the intent of the program in terms of landmarks. This notwithstanding, the revised Addendum 1 has used "Figure 1" that the EPA believes to be the most accurate to illustrate the investigatory programs for both SWMUs.

All areas proposed for GPR, test trench location, and known disposal pit locations are shown on Figure 2 which uses the same base mapping as Figure 1.

There are presently no suitable aerial photographs available. It is the intent to obtain accurate mapping as a part of the RFI preparation process. This will be available for the investigations report.

### **Comment 2**

A table similar to Table 4-2 of the RFI Workplans has been added to the Addendum addressing SWMUs 7 and 8. This can be found on page 6 of the revised Addendum.

### **Comment 3a**

The Addendum now indicates that the three shallow borings will extend to a point 15 feet below the water table or auger refusal if it occurs above this. This change is contained on page 8 of the revised Addendum 1.

**Comment 3b**

The sampling program has been modified to be more specific. Provisions have been made for up to three samples below the water table. See page 8 of the revised addendum.

**Comment 3c**

The original comments on the Site Characterization Report did not indicate the need to perform sampling above the water table. Since this Addendum was in part written to address the concerns related to the Site Characterization Report, no sampling within this zone was included. This notwithstanding, a program of up to three samples from the vadose zone in each of the three shallow borings has been included. This will allow for consistency in analytic approach and a better comparison to be made with previous data. The changes made to the text can be found on page 7 of the revised Addendum 1.

It is the intent of the Addendum to provide details of only the actual investigations to be undertaken. Reliance has been placed on the RFI project plans for details of sampling methodologies, etc. A sentence clearly indicating this has been added to Section 1.0.

**Comment 4a**

An expanded description of the GPR survey, using the suggested grid spacings, has been added to the text (page 12).

**Comment 4b**

The GPR grid will extend to a point 145 feet away from any tank in all directions. The text has been modified to reflect this change (page 12).

**Comment 4c**

A statement has been added to the text indicating that the minimum text trench dimensions will be 20 feet lateral and 8 feet vertical (page 14).

**Comment 5**

The additional wells suggested in the comment have been added to the ground water elevation monitoring effort. See page 9 of the revised Addendum 1.

**Comment 6**

It is the intent to conduct the 48 hour tidal influence study immediately prior to the limited pump testing. This approach will provide pre-pumping water level information. Page 10 of the revised Addendum 1 has been modified to clearly reflect this approach.

**Comment 7**

A separate schedule for Operable Unit 2 has been added to the Addendum. Section 4.0 (page 14) and Figure 3 (page 15) provide the required information.