

Baker**Baker Environmental, Inc.***A Unit of Michael Baker Corporation*Airport Office Park, Building 3
420 Rouser Road
Coraopolis, Pennsylvania 15108(412) 269-6000
FAX (412) 269-2002

December 6, 2001

U.S. Environmental Protection Agency – Region II
290 Broadway – 22nd Floor
New York, New York 10007-1866Attn: Ms. Nicoletta DiForte
Chief, RCRA Caribbean SectionRe: Contract N62470-95-D-6007
Navy CLEAN, District III
Contract Task Order (CTO) 0099
U.S. Naval Station Roosevelt Roads (NSRR), Puerto Rico
RCRA/HSWA Permit No. PR2170027203
Final RFI Work Plan SWMUs 53 and 54

Dear Ms. DiForte:

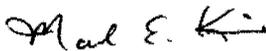
Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with two copies of replacement pages to be replaced in the Draft RFI Work Plan for SWMUs 53 and 54, that was submitted August 27, 2001. Pages 3-2 and 3-3 were revised to increase the confirmatory samples sent to the laboratory from ten percent to twenty percent, with a minimum of three surface and three subsurface soil samples sent to the mainland laboratory. Figure 6-1 was revised in accordance with the actual EPA review time to indicate anticipated implementation of the RFI for SWMUs 53 and 54.

Please use the revised attachments (pages 3-2, 3-3, Figure 6-1, and cover) to finalize the Draft RFI Work Plan for SWMUs 53 and 54.

Baker is also providing you with the attached Navy's Response to EPA's Comment Letter dated November 21, 2001 regarding the Draft RFI Work Plan for SWMUs 53 and 54. Additional distribution has been made as indicated below.

Please do not hesitate to contact me at 412-269-2009, or Mr. Kevin Cloe, P.E. at 757-322-4736, if you have any questions.

Sincerely,

BAKER ENVIRONMENTAL, INC.Mark E. Kimes, P.E.
Activity ManagerMEK/lp
Attachmentscc: Mr. Kevin R. Cloe, LANTDIV - Code EV23KRC (3 copies)
Ms. Madeline Rivera, NSRR (4 copies)
Mr. Tim Gordon, US EPA Region II (2 copies)
Ms. Kathy Rogovin, Booz Allen & Hamilton (1 copy)
Mr. Carl Soderberg, US EPA Caribbean Office (1 copy)
Mr. Carmelo Vazquez, PR EQB (2 copies)
Mr. John Tomik, CH2M Hill Virginia Beach (1 copy)

**NAVY RESPONSES TO EPA COMMENT LETTER DATED NOVEMBER 21, 2001
ON THE DRAFT RFI WORK PLAN FOR SWMUS 53 AND 54,
DATED AUGUST 27, 2001**

Draft RFI Work Plan for SWMUs #53 and #54

EPA Comment

EPA approves the revised portions of the Sampling And Analysis Report for SWMUs #53 and #54, and, with one exception, the Draft RFI Work Plan for SWMUs #53 and #54. That exception is as follows. Section 3.1 of the Draft RFI Work Plan, indicates that surface and subsurface soil samples at SWMU #53 will be field screened for lead and DDT and that a minimum of ten percent of those surface and subsurface soil samples will then submitted for confirmatory laboratory analysis. Ten percent of the 14 surface and 14 subsurface soil samples corresponds to 1.4 samples each. Likewise, if the ten percent figure is applied to the sum total of surface and subsurface soil samples (28), only 3 samples would have to be submitted for confirmatory laboratory analysis. That is not sufficient. EPA requests that the Draft RFI Work Plan be modified to have 3 surface soil samples and 3 subsurface soil samples from SWMU #53 (total of 6 samples) be submitted for confirmatory laboratory analysis for lead and DDT. Accordingly, within 21 days of your receipt of this letter, please submit an addendum to the August 27 RFI Work Plan to reflect this revision. If the submitted addendum acceptably reflects the above revision, the RFI Work Plan for SWMUs #53 and #54 will be acceptable.

Navy Response to EPA Comment

The Navy has revised Section 3.1 of the Draft RFI Work Plan to state that "A minimum of three of the surface soil samples and three of the subsurface soil samples screened in the field will be submitted to the mainland laboratory for confirmatory analysis of 4,4-DDT and Lead. Twenty percent of all additional samples collected and screened in the field, will be submitted to the mainland laboratory for the above mentioned confirmatory analysis." This revision is being submitted in the Final RFI Work Plan for SWMUs 53 and 54.

Schedules

EPA Comment

As has been indicated in Mr. Kevin Cloe's [of Atlantic Division, Naval Facilities Engineering Command] Email of October 17, 2001 to Mr. Tim Gordon, funding to implement the above work plans is not yet available. Therefore, implementation may be delayed from the schedules given in Figure 6-1 of the SWMU 53 and 54 RFI Work Plan and Figure 5-1 of the Tow Way Fuel Farm Additional Data Collection Work Plan. Accordingly, within 21 days of your receipt of this letter please submit up-dated schedules, based on the funding authorized at that point, for implementing the SWMU 53 and 54 RFI Work Plan and the Tow Way Fuel Farm Additional Data Collection and ERA Work Plans, along with the revised portions of the SWMU #53 and #54 RFI Work Plan, as discussed previously.

Navy Response to EPA Comment

Funding is currently available to implement the RFI for SWMUs 53 and 54. Therefore, the Navy will implement the Final RFI Work Plan for SWMUs 53 and 54 upon EPA approval. The Navy has made adjustments to the schedule (Figure 6-1) found in the Draft RFI Work Plan for SWMUs 53 and 54 to reflect actual EPA review time. This revision is being submitted in the Final RFI Work Plan for SWMUs 53 and 54. It should be noted that the updated schedule for the Tow Way Fuel Farm Additional Data Collection Work Plan has been submitted under separate letter.