

Baker**Baker Environmental, Inc.**

A Unit of Michael Baker Corporation

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FAX (412) 269-2002January 24, 2001²U. 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) 099
U.S. Naval Station Roosevelt Roads, Puerto Rico
RCRA/HSWA Permit No. PR2170027203
Final RFI Work Plan for SWMU 3

Dear Ms. DiForte:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with two copies of insert pages for the Draft RFI Work Plan for SWMU 3. These insert pages make up the Final RFI Work Plan for SWMU 3. Your letter of January 3, 2002 requested minor modifications to the document. Having completed the modifications as requested the document is now complete and should be considered approved in accordance with your letter dated January 3, 2002. The Navy will implement the work outlined in this work plan in accordance with the schedule.

Responses to your comments on the Draft RFI Work Plan SWMU 3 dated January 3, 2002 are attached to this letter for your review.

If you have any questions regarding this submittal, please contact me at (412) 269-2009 or Mr. Kevin Cloe at (757) 322-4736.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Mark E. Kimes, P.E.
Activity CoordinatorMEK/lp
Attachmentscc: Mr. Kevin Cloe, LANTDIV - Code EV23KRC (3 copies of entire document)
Mr. Tim Gordon, US EPA Region II (2 copies of insert pages)
Mr. Carl Soderberg, US EPA Caribbean Office (1 copy of insert pages)
Ms. Kathy Rogovin, Booz, Allen & Hamilton (1 copy of insert pages)
Ms. Madeline Rivera, NSRR (4 copies of insert pages)
Mr. Carmelo Vasquez, PREQB (2 copies of insert pages)
Mr. John Tomik, P.G, CH2M Hill-Virginia Beach (1 copy of insert pages)
Ms. Bonnie Capito, LANTDIV - Code EV32 (1 copy of entire document)

**RESPONSE TO EPA COMMENT LETTER DATED JANUARY 3, 2002
DRAFT RFI WORK PLAN FOR SWMU 3
DECEMBER 17, 2001**

EPA Comment No. 1

A total of 14 explosive constituents are included under Table 3-3 of the work plan, which is labeled as "Appendix IX Compound List". However, these 14 constituents are not included in Appendix IX of 40 CFR Part 264, but appear to be taken from EPA analytical method 8330. To better clarify the list of explosive constituents EPA requests that:

- 1) *an additional table [Table 3-4] be submitted for the work plan, listing the explosive constituents to be analyzed;*
- 2) *for consistency with other investigations, EPA recommends that the table should include all explosive constituents analyzed in the November 1999 Hydrogeologic Investigations for Atlantic Fleet Weapons Facility on Vieques; and*
- 3) *Table 3-3 should be revised to contain only constituents given in Appendix IX of 40 CFR Part 264.*

Navy Response to EPA Comment No. 1

- 1) *Table 3-3 has been modified to remove the explosive constituents from the Appendix IX list and provide them in a separate table. The separate table is Table 3-4.*
- 2) *Two additional explosive constituents (nitroglycerin and pentaerythritol tetranitrate) have been added to the explosive list matching the November 1999 Hydrogeologic Investigation Report.*
- 3) *Table 3-3 has been modified to contain only constituents given in Appendix IX of 40 CFR Part 264.*

EPA Comment No. 2

In addition, Section 5.0 (Reporting) states that the RFI report will include "analytical results for the data collected during this RFI field investigations and the rounds of the groundwater monitoring events and the previous portions of the RFI field investigations." EPA has two comments to better clarify what should be included in the draft RFI Final report; however submission of a revised Section 5.0 of the work plan is not necessarily required:

- 1) *the draft RFI Final report should include all analytical results from the four previous groundwater sampling events (June 1998, February 2000, May 2000, and August 2000) implemented pursuant to the Puerto Rico solid waste requirements; and*
- 2) *the draft RFI Final report should include all analytical results as well as a complete discussion and appropriate figures showing the 1996 and 1997 collection and analysis of 15 shoreline*

sediment samples around the perimeter of the landfill, and a complete discussion and appropriate figures showing the 1997 geophysical profiling to delineate the landfill's extent.

Navy Response to EPA Comment No. 2

- 1) Section 5.0 of the text has been modified to read that all analytical results from the four previous groundwater-sampling events (June 1998, February 2000, May 2000, and August 2000) will be provided in the RFI Report for SWMU 3.
- 2) Section 5.0 of the text has been modified to read that the 1996 and 1997 collection and analysis of the 15-shoreline sediments around the landfill along with the geophysical profiling performed in 1997 will be provided in the RFI Report for SWMU 3.

**DIRECTIONS FOR INSERT PAGES
FINAL RCRA FACILITY INVESTGATION WORK PLAN SWMU 3**

The following directions are to be utilized to assist you in inserting the revised pages into the Draft RCRA Facility Investigation Work Plan SWMU 3. These insert pages make up the Final RCRA Facility Investigation Work Plan SWMU 3.

- Replace the Draft cover with the new Final cover.
- Replace page iii of the Table of Contents with the new page iii.
- Replace page 5-1 of Section 5.0 with the new page 5-1.
- Replace the eleven pages of Table 3-3 with the new ten pages of Table 3-3.
- Insert the new Table 3-4 immediately following Table 3-3.