

Baker

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March 18, 2003

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

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

Re: 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
Revised Final RCRA Facility Investigation Report
SWMU 3

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with two copies of insert pages for the Final RCRA Facility Investigation Report for SWMU 3. These insert pages make up the Revised Final RCRA Facility Investigation Report for SWMU 3. Directions for incorporating the insert/replacement pages into the Final RFI for SWMU 3 are attached. Responses to EPA comment letter dated February 19, 2003 on the December 23, 2003 Final RFI for SWMU 3 are included for your review. This submittal is in accordance with EPA's letter of February 19, 2003.

If you have questions regarding this submittal, please contact Mr. Kevin Cloe, P.E. at (757) 322-4736. Additional distribution has been made as indicated below.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Mark E. Kimes, P.E.
Activity Manager

MEK/lp
Attachments

cc: Mr. Kevin R. Cloe, LANTDIV - Code EV23KRC (1 copy)
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 Vasquez, PR EQB (2 copies)
Mr. John Tomik, CH2M Hill Virginia Beach (1 copy)

Challenge Us.

**NAVY RESPONSE TO EPA COMMENTS DATED FEBRUARY 19, 2003 ON
NAVY DECEMBER 23, 2003 RESPONSE TO EPA COMMENTS DATED SEPTEMBER 4,
2002 AND FINAL RFI REPORT FOR SWMU 3 DATED DECEMBER 23, 2002
NAVAL STATION ROOSEVELT ROADS
CEIBA, PUERTO RICO**

EPA COMMENTS

EPA has reviewed Booz Allen's Technical comments, which are enclosed, and concurs with those comments. Based on this review, EPA has the following comments:

1. *EPA's has reviewed Baker Environmental's December 23, 2002 responses to EPA's November 19, 2002 comment letter on the September 4, 2002 Draft RFI Final Report for SWMU 3, and found the responses to be largely, but not entirely, acceptable. Several issues, which are discussed in the enclosed Technical Review, must be, addressed, before the Draft RFI Final Report for SWMU 3 is fully acceptable. Within 35 days of your receipt of this letter, please submit either an addendum to the RFI Final Report for SWMU 3 addressing comments in the enclosed Technical Review, or, considering the significance of SWMU 3, EPA would prefer submission of a complete RFI Final Report, incorporating both the revised pages and figures submitted with Baker Environmental's letter of December 23, 2002, as well as any modifications necessary to address comments in the enclosed Technical Review [dated February 6, 2003].*

Navy Response to EPA Comments

See the response to BAH comments below.

BOOZ ALLEN HAMILTON COMMENTS

Booz Allen Hamilton reviewed the above-referenced RCRA Facility Investigation (RFI) report for technical adequacy and submitted comments on November 19, 2002. The Naval Station Roosevelt Roads (NSRR) submitted responses to Booz Allen's and EPA's comments and submitted revised document pages to EPA on December 23, 2002. Booz Allen reviewed the information provided in the December 23, 2002 correspondence. In general, the previous comments have been accepted by NSRR and appropriate revisions have been made to the document. However, outstanding issues are discussed below.

EPA COMMENTS

1. *The response is acceptable.*
2. *The response is acceptable.*

BOOZ ALLEN COMMENTS

I General Comments

1. *The response is acceptable.*

2. *NSRR has indicated that Section 5.2 (Sediment) will include a brief discussion on the human health and ecological risk assessment data along with a table comparing sediment results from both the 1995 and 1997 RFI, as EPA requested. In addition, NSRR indicated that references will be added where appropriate in the document to afford the reader the opportunity to trace the history of the site.*

While the new text and table help to clarify the history of the Health and Environmental Assessments (IRAs) for solid waste management unit (SWMU) 3 sediments, critical information is missing. This discussion indicates that potential risks are posed by the sediments in area of concern (AOC) D, and the Executive Summary and Section 6.1 indicate that NSRR proposed and EPA agreed that no further action was required for SWMU 3 sediments. However, the relationship between AOC D and SWMU 3 has not been established, and the technical basis for the no further action recommendation has not been included. Thus, Section 5.2 should be expanded to clarify how the HEA for AOC D relates to SWMU 3, and why no further action is appropriate for SWMU 3 particularly when the Phase I HEA indicated potential risks to exposed populations.

Navy Response to BAH Comment General Comment No. 2:

The Navy will include in Section 5.2 a discussion of the relationship between AOC D and SWMU 3 sediments. Included in the Navy's discussion will be the technical basis for the no further action recommendation in which the EPA has already approved.

II Specific Comments

Table 5-1 Summary of Organic Detections in Groundwater, SWMU 3, Base Landfill

1. *NSRR has indicated that it will utilize a low level polycyclic aromatic hydrocarbon (PAH) analysis with reporting limits at 2 µg/L. NSRR further states that this value is at the maximum contaminant level (MCL) for benzo(a)pyrene but above the EPA Region III tap water risk-based concentration (RBC) for the majority of the PAHs.*

However, NSRR's response incorrectly stated the MCL for benzo(a)pyrene, which is actually 0.2 µg/L, rather than 2 µg/L. Thus, a reporting limit of 2 µg/L remains too high. SW-846 Method 8310 provides a reporting limit for benzo(a)pyrene of approximately 0.2 µg/L and a method detection limit of approximately 0.02 µg/L, which are much closer to the MCL and RBC. Therefore, it is recommended that NSRR utilize EPA Method 8310 for future groundwater monitoring to ensure that detection and reporting limits are lower than or as close as possible to the appropriate screening levels.

Navy Response to BAH Specific Comment No. 1:

The Navy Response to BAH Specific Comments No. 1 dated December 23, 2002 contained a typographical error for the reporting limit of low level PAH benzo(a)pyrene at 2 µg/L. The actual reporting limit for low level 8270 for benzo(a)pyrene is 0.2 µg/L. This reporting limit matches the reporting limit utilizing Method 8310. The Navy will utilize 8270 for this analysis for two reasons 1) This method has the same reporting method as Method 8310, 2) Method 8270 low level is mass spec

with a mass spec detector which is confirmational. Method 8310 is not confirmational and utilizes HPLC that is highly sensitive to matrix interferences and routinely requires dilution that negates the benefit of the low reporting limit.