



Baker Environmental, Inc.
A Unit of Michael Baker Corporation

Airside Business Park
100 Airside Drive
Moon Township, PA 15108
Office: 412-269-6300
Fax: 412-375-3995

April 17, 2008

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 Programs Branch

Re: Contract N62470-02-D-3052
Navy CLEAN, District III
Contract Task Order (CTO) 110
U.S. Naval Activity Puerto Rico (NAPR)
Final Phase I RCRA Facility Investigation Work Plan for
SWMU 78, Pole Yard
Naval Activity Puerto Rico
RCRA/HSWA Permit No. PR2170027203

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is pleased to provide you with one hard copy of the replacement pages for the Draft Phase I RCRA Facility Investigation Work Plan for SWMU 78, Pole Yard, Naval Activity Puerto Rico for your review and approval. These replacement pages make up the Final Phase I RCRA Facility Investigation Work Plan for SWMU 78. Directions for inserting the replacement pages into the Draft Phase I RCRA Facility Investigation Work Plan for SWMU 78 are provided for your use. Also included with the hard copy is an electronic copy provided on CD of the Final Phase I RCRA Facility Investigation Work Plan for SWMU 78, Pole Yard, Naval Activity Puerto Rico.

This work plan is being submitted in accordance with EPA comments from Mr. Mr. Timothy Gordon received on April 1, 2008 via electronic mail. If you have questions regarding this submittal, please contact Mr. David Criswell, P.E. at (843) 743-2130. Additional distribution has been made as indicated below.

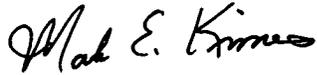
Baker has received funding from the Navy to conduct the field work and reporting for the CMS Investigations at SWMUs 56, 61, 69, and 74 and the Phase I RFI investigations at SWMUs 62, 71, and 78. The field work for all seven of these SWMUs is being conducted under one mobilization over a two month period. Mobilization for this work is scheduled to occur on April 27, 2008 beginning with the field work for SWMUs 56, 69, and 74. The field work for SWMUs 61, 62, 71, and 78 is scheduled after completion of field work at SWMUs 56, 69, and 74, which is estimated to be around June 5, 2008. Therefore the Navy is requesting an expedited review of the minor modifications to the enclosed work plan for SWMU 78 in order to have approval prior to initiating the field work.

Mr. Adolph Everett, P.E.
U.S. Environmental Protection Agency, Region II
April 17, 2008
Page 2

If you have questions regarding this submittal, please contact Mr. David Criswell at (843) 743-2130.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Mark E. Kimes, P.E.
Activity Manager

MEK/lp
Attachments

cc: Ms. Debra Evans-Ripley, BRAC PMO SE (letter only)
Mr. David Criswell, BRAC PMO SE (1 hard copy and 1 CD)
Mr. Pedro Ruiz, NAPR (1 CD)
Ms. Bonnie Capito, NAVFAC Atlantic – Code EV42 (1 hard copy for Admin Record)
Mr. Tim Gordon, US EPA Region II (1 hard copy and 1 CD)
Mr. Andrew Dorn, TechLaw, Inc. (1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy and 1 CD)
Mr. Julio I. Rodriquez Colon, PR EQB (1 hard copy and 1 CD)
Ms. Willmarie Rivera, PR EQB (1 hard copy and 1 CD)
Mr. Felix Lopez, U.S. F&WS (1 CD)
Mr. John Swenfurth, CH2M Hill, Tampa (1 CD)

NAVY RESPONSE TO EPA COMMENTS DATED JANUARY 2, 2008

TECHLAW COMMENTS ON THE DRAFT PHASE I RFI WORK PLAN FOR SWMU 78

(TechLaw comments are provided in italics while the Navy responses are in regular print)

GENERAL COMMENTS

TechLaw General Comment 1

- 1. Section 3.0, Scope of Investigation, states that if visual evidence indicates contamination impact extends to the soil/bedrock interface, then one groundwater monitoring well will be installed. The text does not state what types of visual evidence are indicative of the extent of contamination. Further, as stated in Section 3.1, the field log will include flame ionization detector (FID)/photo ionization detector (PID) readings. It is unclear whether field data generated from these screening tools will be utilized in making the decision of whether to put in the well. Revise the text to state that if there is visual evidence or field screening data that provides evidence that contamination extends into the bedrock, then one groundwater monitoring well will be installed.*

Navy Response to TechLaw General Comment 1:

The first paragraph in Section 3.0 of the work plan will be revised to read “If the field team observes significant staining, stressed vegetation, or if the field screening data shows evidence of contamination at sample location 78SB01, one groundwater well will be installed at this location.” In addition, the second paragraph of Section 3.2 (Monitoring Well Installation Program) will be revised to clarify that a monitoring well will be installed at soil boring location 78SB01 if the field team observes significant staining, stressed vegetation, and/or if flame ionization detector (FID)/photo ionization detector (PID) readings during soil boring advancement indicate that contamination is suspected to extend to the bedrock interface.

TechLaw General Comment 2

- 2. There appears to be a general lack of historical data for this SWMU. The SWMU is new, and has not been investigated prior to the currently proposed plan. In addition, no photographs of the tractor-trailers and the laydown area have been provided. It is suggested that available additional information, such as historical aerial or site photographs be included in the final version of the report. If prior uses of the SWMU are determined, the areas of interest should be clearly labeled on the figures.*

Navy Response to TechLaw General Comment 2: Historical data for this SWMU is limited. All available historical information and site photographs are included as part of the work plan. No revisions to the work plan are required.

TechLaw General Comment 3

3. *The scope discussion does not address the contractor that will be retained to implement the Work Plan, but the following sections repeatedly defer to contractor plans to be submitted in the future, rather than providing specific information. For example, Sections 3.3 and 3.6 note that the analytical laboratory and data validation have not been selected, Section 3.5.3 requires an equipment decontamination plan to be prepared by the contractor, and Section 3.5.5 requires a contractor health and safety plan. Figure 6-1 shows that the contractor and key personnel are yet to be determined. To be considered a final, approvable Work Plan, the document should provide the specific proposed plans and identify the contractor(s) and qualified personnel who will implement the Work Plan.*

Navy Response to TechLaw General Comment 3:

The Draft Phase I RFI Work Plan was originally prepared with the understanding that an undetermined third party would be responsible for implementation of the activities. However, since that time it has been determined that Baker will be implementing this work. Therefore, the work plan will be revised to provide the missing information requested above. Section 3.5.5 will be revised to state that the health and safety procedures as part of the approved RFI Management Plans for Baker will be used during this investigation. The Standard Operating Procedures for this work plan are included as Appendix B and are referenced throughout the text, where appropriate. Figures 5-1 and 6-1 will be updated to reflect the project schedule and appropriate key personnel for the Phase I RFI, respectively.

TechLaw General Comment 4

4. *Based on the limited data available, it is suggested that one additional sample be collected.*
 - a. *One additional soil sample should be collected to the west of 78SB15 within the area occupied by the tractor-trailers.*

Navy Response to TechLaw General Comment 4:

One additional soil sample location (78SB16) will be added to the sampling and analysis program, west of sample 78SB15 within the area occupied by the tractor-trailers. This sample point will be added to the soil sampling and analysis discussion in Section 3.0, as well as on Figure 3-1 and in Table 3-1 - Summary of the Sampling and Analytical Program.

SPECIFIC COMMENT

TechLaw Specific Comment 1

- 1. Section 1.2, Site Location and History, Page 1-1: The text states that there were past spillages at the pole yard. However, the text does not state what may have been spilled. Revise this section to specify what may have been spilled at the pole yard, and the location of the spills.*

Navy Response to TechLaw Specific Comment 1: There was one suspected release associated with accumulated water from the drainage valve of the concrete pad storing transformers at this SWMU. The sentence in the first paragraph of Section 1.2 that references past spillages will be deleted from the text.