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August 10, 2001

U. S. Environmental Protection Agency - Region II
290 Broadway - 22nd Floor
New York, New York 10007-1866Attn: Mr. Timothy Gordon
Acting Chief, RCRA Caribbean SectionRe: Contract N62470-95-D-6007
Navy CLEAN, District III
Contract Task Order (CTO) 0033
U.S. Naval Station Roosevelt Roads (NSRR), Puerto Rico
RCRA/HSWA Permit No. PR2170027203
Ecological Risk Assessments for SWMUs 1 and 2 and SWMU 45

Dear Mr. Gordon:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is pleased to provide you with two copies of the Draft Screening-Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate for SWMUs 1 and 2, and two copies of the Draft Screening-Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate for SWMU 45. It should be noted that the Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment at SWMUs 1 and 2 and SWMU 45 are included in the above mention documents as Appendix B. Additional distribution has been made as indicated below.

These documents are being submitted as part of a new proposed strategy to address the ecological risks at SWMUs 1, 2, and 45 as discussed in the phone call on July 24, 2001 between yourself, Kevin Cloe, and myself. It was during this conversation that you recommended providing the attached documents for your review. The rationale for this strategy is provided in the paragraphs that follow.

The Navy submitted a Revised Final II CMS Work Plan for SWMUs 1 (Army Cremator Disposal Site) and 2 (Langley Drive Disposal Area) and a Revised Final II CMS Work Plan for SWMU 45 (The Former Power Plant) July 14, 2000. Both of these documents, which have been approved by the EPA on May 4, 2001, included methodology for conducting an ecological risk assessment (ERA). The methodology presented within the work plans covered Steps 1 and 2 of the Navy ERA process:

- Screening-level problem formulation and ecological effects evaluation (Step 1).
- Screening-level exposure estimate and risk calculation (Step 2).

The work plans also included methodology for conducting Step 3a of the baseline risk assessment. Under Navy policy, Step 3a precedes the baseline risk assessment problem formulation (Step 3b).



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Both work plans acknowledged that significant data gaps exist at each SWMU. At SWMUs 1 and 2, the nature and extent of potential contamination within downgradient aquatic habitats (mangrove forest and Ensenada Honda) has not been adequately characterized. Available data for the mangrove forest downgradient from SWMU 1 is limited to four sediment samples, while the available analytical data for the mangrove habitat downgradient from SWMU 2 is limited to three surface water and sediment samples. The surface water and sediment samples from SWMU 2 were collected during the 1988 Confirmation Study. As such, these data do not represent current surface water and sediment quality. At SWMU 45, the nature and extent of PCB contamination in Puerca Bay has not been adequately characterized. Surface water data is also lacking from this surface water body.

The Navy is requesting USEPA approval to forgo completion of the screening-level risk calculation (Step 2) and Step 3a of the baseline risk assessment at SWMUs 1 and 2 until data gaps have been adequately addressed through additional sampling. Under this scenario, Step 1 of the Navy ERA guidance, as well as the screening-level exposure estimate would be completed and are being submitted to the USEPA attached to this letter. As part of this submittal, a sampling and analytical program is presented that addresses existing data gaps and data inadequacies. The submittal also includes methodology for evaluating the West Indian manatee. The USEPA-approved Revised Final II CMS Work Plan stated that this methodology would be presented in the document presenting the focused sampling and analytical program. While this proposal delays submittal of the screening-level risk calculation and Step 3a of the baseline risk assessment for SWMUs 1 and 2, it does not affect the overall completion of the final CMS report since the USEPA-approved Revised Final II CMS Work Plan identified the need to address known data gaps through a focused sampling and analytical program. Under the original schedule, this focused sampling and analytical program was to be completed after submittal and approval of draft ERA.

The Navy is also requesting USEPA approval to forgo completion of the screening-level risk calculation (Step 2) and Step 3a of the ERA at SWMU 45. Under this scenario, Step 1 and the screening-level exposure estimate would be completed and are being submitted to the USEPA attached to this letter. The screening-level risk calculation and Step 3a will be completed once data gaps and inadequacies have been addressed. Again, the need to address data gaps was acknowledged in the Revised Final CMS Work Plan for SWMU 45. As part of the submittal, a sampling and analytical program is presented that addresses data gaps and inadequacies. The submittal also includes methodology for evaluating potential risks to the West Indian manatee and avian piscivores. The USEPA-approved Revised Final II CMS Work Plan stated that this methodology would be submitted in the document presenting the focused sampling and analytical program at this SWMU. Identical to SWMUs 1 and 2, addressing data gaps prior to completion of the screening-level risk calculation and Step 3a of the baseline risk assessment will not affect the scheduled completion date for the final CMS report.

In summary, addressing data gaps and inadequacies at SWMUs 1, 2, and 45 prior to completion of the screening-level risk calculation and Step 3a of the baseline risk assessment will prevent reevaluation of risks once data gaps are filled. As stated, the proposed outlined above does not affect the schedule for completion of the CMS investigation at each SWMU (see the schedules in the attached work plans). The proposal only affects the order in which specific tasks would be completed during the CMS investigation. This change in order can result in significant savings. It is also the intention to perform the fieldwork addressing the data gaps during the same time frame as the fieldwork for the TWFF.

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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 Manager

MEK/lp
Attachments

cc: Mr. Kevin Cloe, P.E. – Code EV23 (1 copy)
Ms. Madeline Rivera, NSRR (4 copies)
Mr. John Tomik, CH2M Hill Virginia Beach (1 copy)
Ms. Kathy Rogovin, Booz Allen & Hamilton (1 copy)
Mr. Mace Barron, Booz Allen & Hamilton (1 copy)
Mr. Carl A. Soderberg, USEPA Caribbean Office (1 copy)
Ms. Asa Colon, PREQB (2 copies)