

**Baker**

0301-2/15/00-00870

**Baker Environmental, Inc.**

*A Unit of Michael Baker Corporation*

Airport Office Park, Building 3  
420 Rouser Road  
Coraopolis, Pennsylvania 15108

February 15, 2000

(412) 269-6000  
FAX (412) 269-2002

U. S. Environmental Protection Agency  
Region II  
Chief, RCRA Caribbean Section  
290 Broadway - 22nd Floor  
New York, NY 10007-1866

Attn: Ms. Nicoletta DiForte

Re: Contract 62470-95-D-6007  
Navy CLEAN, District III  
Contract Task Order (CTO) 0031  
U.S. Naval Station Roosevelt Roads, Puerto Rico  
RCRA Corrective Action Program  
RCRA/HSWA Permit No. PR2170027203  
Final TCE Investigation Report for SWMU 7/8 – Tow Way Fuel Farm  
Operable Unit (OU) 2.

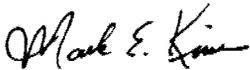
Dear Ms. DiForte:

Baker Environmental, Inc. is submitting, on behalf of the Navy, the Final TCE Investigation Report for SWMU 7/8 – Tow Way Fuel Farm. This work was completed according to the EPA approved Work Plan dated April 21, 1999. This Work Plan was issued as part of the response to the Navy's response to the EPA comment letter dated March 8, 1999. This Final Report addresses the EPA comments dated January 20, 2000. Responses to these comments are attached for your files.

Please do not hesitate to call Mr. Christopher T. Penny at (757) 322-4815 or myself at (412) 269-2009 if you have any questions or desire further clarification of any of the points discussed in this letter or the attached report.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Mark E. Kimes, P.E.  
Activity Coordinator

MEK/lp

cc: Mr. Christopher T. Penny, LANTDIV, Code 18231 (3 copies)  
Mr. Tim Gordon, US EPA Region II (3 copies)  
Ms. Madeline Rivera – NSRR (4 copies)  
Mr. Isreal Torres – PREQB (2 copies)  
Mr. John Tomik, CH2M Hill (1 copy)  
Mr. Carl A. Soderberg, US EPA Caribbean Division (1 copy)



**Response to EPA Comments  
EPA Comment Letter dated January 20, 2000  
Draft TCE Investigation Report for Tow Way Fuel Farm**

**EPA Comment**

*EPA's review found that in Sections 6.4.3 and 6.5, the total non-cancer hazard index (HI) is indicated to be 1.2; yet Table 6-5 lists the total HI as 1.8. Please submit revised pages and or Tables to correct the conflicting text.*

**Navy Response**

Table 6-5 was correct. The text in Sections 6.4.3 and 6.5 has been revised to read "1.8".

**EPA Comment**

*Also, as indicated in Section 6.4 of the report, the total cancer risk estimates associated with the volatile hazardous constituents trichloroethene (TCE), 1, 1-Dichloroethene (DCE), and chloromethane dissolved in the groundwater slightly exceed the risk level of  $1.0 \times 10^{-6}$ , and the cumulative HI for non-cancer risks slightly exceeds one. Therefore, a slight health risk is indicated for construction worker exposures to contaminated groundwater as a result of excavation to the water table.*

**Navy Response**

Comment noted. The slight human health risks indicated for dissolved TCE, DCE, and chloromethane will be addressed further in the development of the CMS for the TWFF.

**EPA Comment**

*Also, no evaluation of ecological risks was conducted, even though the dissolved TCE plume is in proximity to the likely area of groundwater discharge to the surface waters of Ensenada Honda.*

**Navy Response**

Comment noted. Ecological risks associated with the dissolved TCE, DCE, and chloromethane plume will be evaluated in the CMS for the TWFF.

**EPA Comment**

*Nevertheless, EPA concurs with the recommendation, given in Section 7.2 of the report, that a more detailed evaluation will be performed in the CMS for Tow Way Fuel Farm. That evaluation must include an acceptable ecological risk assessment for the dissolved TCE, DCE, and chloromethane as part of the CMS final report currently being developed for Tow Way Fuel Farm, and the CMS must address the slight human health risks indicated for dissolved TCE, DCE, and chloromethane. Subject to the Navy submitting revised pages and or Tables to correct the erroneous text regarding the cumulative total HI, as discussed above, and completion of an acceptable ecological risk assessment as discussed above, EPA approves the TCE investigation report.*

**Navy Response**

Comment noted. The CMS currently being developed for the TWFF will address the ecological risk assessment and the slight human health risks for dissolved TCE, DCE, and chloromethane.