



**Baker Environmental, Inc.**  
*A Unit of Michael Baker Corporation*

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June 14, 2004

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

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

Re: Contract N62470-95-D-6007  
Navy CLEAN, District III  
Contract Task Order (CTO) 0033  
U.S. Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico  
RCRA/HSWA Permit No. PR2170027203  
Navy Response to EPA Comments Dated February 24, 2004  
Final Additional Data Collection Investigation Report for SWMU 9

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is providing you with one copy of the replacement cover and spine, and inside cover for the Draft Additional Data Collection Investigation Report for SWMU 9 dated January 8, 2004. These replacement pages make up the Final Additional Data Collection Investigation Report for SWMU 9. Directions for inserting the replacement pages into the Draft Additional Data Collection Investigation Report for SWMU 9 are provided for your use.

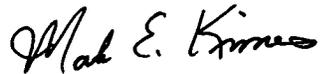
This document is submitted in response to the EPA Comment letter dated February 24, 2004 approving the Draft Additional Data Collection Investigation Report for SWMU 9. The Navy Response to EPA Comment dated February 26, 2004 on the Draft Additional Data Collection Investigation Report for SWMU 9 is attached to this letter.

Mr. Adolph Everett, P.E.  
U.S. Environmental Protection Agency, Region II  
June 14, 2004  
Page 2

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, P.E., LANTDIV - Code EV23KC (1 copy)  
Mr. Peter Cummings, LANTDIV – Code AQ114 (letter only)  
Ms. Lee Anne Rapp, P.E, LANTDIV – Code EV31LR (letter only)  
Ms. Madeline Rivera, NSRR (4 copies)  
Mr. Tim Gordon, US EPA Region II (2 copies)  
Ms. Kathy Rogovin, Booz Allen & Hamilton (2 copies)  
Mr. Carl Soderberg, US EPA Caribbean Office (1 copy)  
Mr. Carmelo Vazquez, PR EQB (2 copies)  
Mr. John Tomik, CH2M Hill Virginia Beach (1 copy)

**NAVY RESPONSES TO EPA COMMENTS**  
**DATED FEBRUARY 24, 2004 ON THE**  
**DRAFT ADDITIONAL DATA COLLECTION INVESTIGATION**  
**REPORT FOR SWMU 9 DATED JANUARY 8, 2004**

**EPA COMMENT NO. 1:**

*EPA finds that the January 8, 2004 Draft Additional Data Collection Investigation Report (“ADCIR”) for SWMU 9 is acceptable. Since the results of the ADCIR shall be incorporated into the draft Final Corrective Measure Study (CMS) Report for SWMU 9, in the draft Final CMS, when developed, please clarify the equations and exposure parameters used in the ADCIR to calculate lead and zinc risks. Also, the draft Final CMS report should specify the source for the lowest observed adverse effect level (LOAEL), no observed adverse effect level (NOAEL), and maximum acceptable toxicant concentration (MATC) values presented in Tables 4-2,4-4,4-9, and 4-12 of the ADCIR.*

**Navy Response to EPA Comment No.1:**

The requested information was previously presented in the Revised Draft RFI report dated March 10, 2003 (note this document was referenced in the Draft Additional Data Collection Report for SWMU 9). The appropriate tables and text from the Revised Draft RFI that present this information will be incorporated into the Draft CMS Final Report.