

Baker**Baker Environmental**

A Unit of Michael Baker Corporation

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February 15, 2000

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) 0099
U.S. Naval Station Roosevelt Roads, Puerto Rico
RCRA Corrective Action Program
RCRA/HSWA Permit No. PR2170027203
Final SWMU 30 - Former Incinerator Area RFI Report
Operable Unit (OU) 1

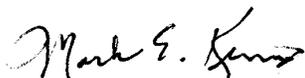
Dear Ms. DiForte:

Baker Environmental, Inc. is submitting, on behalf of the Navy, the Final RFI for SWMU 30 - Former Incinerator Area requested in the EPA letter dated November 14, 1997. This work was completed according to the EPA approved Work Plan dated December 24, 1997. 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)

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**Response to EPA Comments
EPA Comment Letter dated January 20, 2000
Draft Phase II RFI Report for SWMU 30 – Former Incinerator Area**

EPA Comment

EPA has reviewed this report, transmitted by Baker Environmental on December 10, 1999, and has several comments. Since the Tier II screening process cited in Section 6.3 was based on a method given in a 1999 personal correspondence from Ms. Gina Ferreira of EPA's Superfund Program, please submit a copy of the cited personal correspondence, which will then be included as an Appendix to the RFI report. Furthermore, since, as indicated in Section 6.4, the Tier II screening for two inorganic hazardous constituents (antimony and zinc) dissolved in the groundwater resulted in HI's (for non-cancer risk) exceeding 1.0, a potential human health risk is indicated. Therefore, EPA's approval of the no further action required (NFAR) recommendation for this SWMU, given in Section 8.2 of the report, is contingent on groundwater underlying or downgradient of the SWMU not being used in the future as a drinking water source. Furthermore, this approval is tentative, pending completion of public comment of this decision, which will be incorporated in a Draft Permit.

Navy Response

Comment noted. The correspondence which has occurred concerning the elimination of inorganic constituents compared to 2x the average detected background concentrations has been included as Appendix G per EPA's request.

EPA Comment

If such usage does occur in the future, EPA reserves its right to re-open its approval of the NFAR status for SWMU #30, and if warranted, require further action at that time to protect human health. EPA's approval of the NFAR status is also contingent on the Tier II screening method given in the cited 1999 personal correspondence, being acceptable for usage in RCRA corrective action final decisions. Based on this contingent approval of the NFAR status for SWMU #30, the RFI is now completed.

Navy Response

Comment noted.