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November 21, 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) 108
U.S. Naval Activity Puerto Rico (NAPR)
Navy Responses to EPA Comments dated October 3, 2008 on the Final
Steps 6 and 7 of the Baseline Ecological Risk Assessment for SWMU 45
EPA ID No. PR2170027203

Dear Mr. Everett:

Baker Environmental, Inc. (Baker), on behalf of the Navy, is pleased to provide you with the Navy Responses to EPA comments dated October 3, 2008 on the Final Steps 6 and 7 of the Baseline Ecological Risk Assessment for SWMU 45. Included with these responses is one hard copy of Tables 2-4 and 2-5. These replacement pages make up the Addendum to the Final Steps 6 and 7 of the Baseline Ecological Risk Assessment for SWMU 45. Also included with Tables 2-4 and 2-5 is an electronic copy provided on CD of the Addendum to the Final Steps 6 and 7 of the Baseline ERA for SWMU 45. This document is being submitted in accordance with EPA comments dated October 3, 2008.

If you have questions regarding this submittal, please contact Mr. David Criswell at (843) 743-2130. Additional distribution has been made as indicated below.

Sincerely,
BAKER ENVIRONMENTAL, INC.

A handwritten signature in black ink that reads "Mark E. Kimes".

Mark E. Kimes, P.E.
Activity Manager

MEK/lp
Attachments

cc: Ms. Jean Mann, NAVFAC Atlantic – Code AQ119 (letter only)
Mr. Tim Gordon, US EPA Region II (1 hard copy and 1 CD)
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 Administrative Record)
Mr. Michael S. Smith, TechLaw, Inc. (1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy and 1 CD)
Mr. Manny Vargas, 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 OCTOBER 3, 2008

**TECHLAW, Inc. COMMENTS ON THE FINAL STEPS 6 AND 7
OF THE ECOLOGICAL RISK ASSESSMENT FOR SWMU 45 DATED JULY 11, 2008**

TechLaw comments are provided in italics for ease of review.

1. **Evaluation of the Response to TechLaw, Inc. General Comment 2:** *The response to General Comment 2 does not adequately address the issue being raised. The original comment requested a table that summarizes the MATC (Maximum Acceptable Toxicant Concentration) values that were used to calculate MATC based Hazard Quotient (HQs) values. Table 4-13 contains the MATC-based HQs, but not the MATC values used to calculate those HQs. The lack of MATC values prevented the reviewer from being able to verify the MATC-based HQs. Please provide a table that shows the MATC values and explain how each value was calculated.*

Navy Response to TechLaw, Inc. Comment 1: Table 2-5 will be revised to include test species and receptor species Maximum Acceptable Toxicant Concentration (MATC) values. The receptor species MATC values (MATC values adjusted to reflect differences in body weights between the mammalian test species and the West Indian manatee) were used to derive the MATC-based HQ values included in Table 4-13.

2. **Evaluation of the Response to TechLaw, Inc. General Comment 3:** *The response to General Comment 3 only partially addresses the issue being raised. It is understood that the results in Table 2-4 are from the Final Additional Data Collection Report and Screening-Level Ecological Risk Assessment for SWMU 45 (Baker, 2006a). It is suggested that a footnote be added to this table citing this particular document as the source for the input parameters used to calculate the HQs shown. This would clarify to the reader from where the values originated.*

Navy Response TechLaw, Inc. Comment 2: Table 2-4 will be revised to include the following footnote:

Hazard Quotient values and the methodology used in their derivation were previously presented in the Final Additional Data Collection Report and Screening-Level Ecological Risk Assessment and Step 3a of the Baseline Ecological Risk Assessment for SWMU 45 (Baker, 2006a).

References:

Baker Environmental, Inc (Baker). 2006a. Final Additional Data Collection Report and Screening-Level Ecological Risk Assessment and Step 3a of the Baseline Ecological Risk Assessment for SWMU 45, Naval Activity Puerto Rico, Ceiba, Puerto Rico. Coraopolis, Pennsylvania. May 18, 2006