



Michael Baker Jr., Inc.
A Unit of Michael Baker Corporation

January 13, 2010

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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 N62470-07-D-0502
IQC for A/E Services for Multi-Media
Environmental Compliance Engineering Support
Delivery Order (DO) 0002
U.S. Naval Activity Puerto Rico (NAPR)
EPA I.D. No. PR2170027203
Revised Final Phase I RCRA Facility Investigation Report for SWMU 62

Dear Mr. Everett:

Michael Baker Jr., Inc. (Baker), on behalf of the Navy, is pleased to provide you with one hard copy of the replacement pages for the Final Phase I RCRA Facility Investigation Report for SWMU 62, Naval Activity Puerto Rico, for your review and approval. These replacement pages make up the Revised Final Phase I RCRA Facility Investigation Report for SWMU 62. Directions for inserting the replacement pages into the Final Phase I RCRA Facility Investigation Report for SWMU 62 are provided for your use. Also included with the copy of the replacement pages is one electronic copy provided on CD of the Revised Final Phase I RCRA Facility Investigation Report for SWMU 62, Naval Activity Puerto Rico.

This document is being submitted in accordance with EPA comments dated December 15, 2009. The Navy responses to these comments are attached for your review.

If you have questions regarding this submittal, please contact Mr. Mark Davidson at (843) 743-2124. Additional distribution has been made as indicated below.

Sincerely,

MICHAEL BAKER JR., INC.

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

Mark E. Kimes, P.E.
Activity Coordinator

MEK/lp
Attachments

cc: Ms. Debra Evans-Ripley, BRAC PMO SE (letter only)
Mr. David Criswell, BRAC PMO SE (letter only)
Mr. Mark E. Davidson, BRAC PMO SE (1 hard copy and 1 CD)
Mr. Pedro Ruiz, NAPR (1 CD)
Ms. Bonnie P. Capito, NAVFAC Atlantic – Code EV32 (1 hard copy for Admin Record)
Mr. Tim Gordon, US EPA Region II (1 hard copy and 1 CD)
Mr. Carl Soderberg, US EPA Caribbean Office (1 hard copy and 1 CD)
Mr. Felix Lopez, US F&WS (1CD)
Mr. Anthony Scacifero, TechLaw, Inc. (1 CD)
Ms. Willmarie Rivera, PREQB (1CD)
Ms. Gloria Toro, PREQB (1 hard copy and 1 CD)

NAVY RESPONSES TO THE USEPA EVALUATION DATED DECEMBER 15, 2009

**FINAL PHASE I RCRA FACILITY INVESTIGATION REPORT FOR SWMU 62 – FORMER
BUNDY DISPOSAL AREA DATED FEBRUARY 6, 2009**

(EPA Comments are provided in italics, while Navy responses are provided in plain text)

Evaluation of the response to EPA comment 1: The response appears to be partially adequate. According to Section 6.1.2, Ecological, of the Final Phase I RCRA Facility Investigation Report (Report), only those soil samples collected from depths between one and three feet below ground surface (bgs) were compared against ecological screening criteria; however, based on review of Table 6-2, all concentrations of vanadium detected have been screened against the Selected Ecological Surface Soil Screening Values, regardless of the depths from which the samples were collected. Revise the Report to clarify why the concentrations of vanadium detected in samples collected from depths greater than three feet were compared to ecological screening criteria or remove the highlighting from the values at depths greater than three feet bgs.

In addition, based on review of Table 6-2, the concentration of copper detected at boring 62SB06-01 [140 milligrams per kilogram (mg/kg)] exceeded the background screening concentration of 120 mg/kg, however it was not noted as such. Revise the table and the text of Section 6.3, Subsurface Soil, to reflect and discuss this exceedance. Further, since Figure 6-2 presents the locations where inorganic parameters exceeded ecological screening criteria and the NAPR base-wide background value; the copper exceedance should also be depicted on the figure.

Navy Response: Table 6-2 will be revised to reflect that only subsurface soil samples collected from the 1.0 to 3.0-foot depth interval were screened against ecological soil screening values (i.e., highlighting will be removed from vanadium concentrations for samples collected at depths greater than three feet below ground surface). In addition, Table 6-2, Figure 6-2, and the text in Sections 6.3 and 7.1 will be revised to indicate that the copper detection in subsurface soil sample 62SB06-01 exceeds the ecological soil screening value and background screening value.

Evaluation of the response to EPA comment 4: The response appears to be partially adequate. It is unclear how the revised ecological screening value for tin was determined given that there is no plant-based ecological screening level reference provided for tin in the footnote referenced in Table 6-1. Provide a technical reference for the revised screening value or a rationale for why the value was selected.

Navy Response: Table 6-1 will be revised to provide a technical reference for the ecological screening value selected for tin.