



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 24 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark E. Davidson
US Navy
BRAC PMO SE
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,
EPA I.D. Number PRD2170027203,

- 1) August 2, 2007 Navy Responses to EPA Comments on Draft Phase I RFI Reports for SWMUs 16, 42, and AOC A;
- 2) July 20, 2007 Navy Responses to EPA Comments on Draft Final RFI Report for SWMU 14 (former "Crash-Crew" Fire Training Area), and SWMU 68 (former Southern Fire Training Area);
- 3) July 20, 2007 Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment for SWMU 14; and
- 4) Navy Responses to EPA's June 28, 2007 Comments on Draft Phase I RFI Reports on SWMUs 27, 28, and 29.

Dear Mr. Davidson:

This letter is addressed to you as the Navy's designated project coordinator pursuant to the January 29, 2007 RCRA Administrative Order on Consent ("the Consent Order") between the United States Environmental Protection Agency (EPA) and the U.S. Navy (the Navy). EPA Region 2 has completed its reviews of the above documents, which were submitted on behalf of the Navy, pursuant to the requirements of the Consent Order. Based upon our reviews, EPA has the following comments. Additional comments are also given in the three enclosed Technical Reviews prepared for EPA by our consultant, TechLaw, Inc.

Responses to EPA Comments on Draft Phase I RFI Reports for SWMUs 16, 42, and AOC A

EPA has completed its review of the Responses submitted on August 2, 2007 by Baker Environmental on behalf of the Navy. Those responses address EPA's June 11, 2007 Comments on the Draft Phase I RFI Reports for SWMUs 16, 42, and AOC A. EPA has determined that the Response to comments on the SWMU 16 RFI Report are acceptable; however, EPA does not fully concur with the Response to comments on the SWMU 42 and AOC A RFI Reports. Comments on the Navy's Responses are given in the enclosed Technical Review prepared for EPA by our consultant, TechLaw, Inc. EPA concurs with those comments. Those comments, and approaches to addressing them, especially those regarding natural background conditions for certain inorganic constituents, including arsenic and vanadium, were discussed with the Navy and Baker Environmental during a conference call held on September 20, 2007. Based on that conference call, please submit by 60 days from the date of your receipt of this letter, the following:

- 1) a revised Phase I RFI Report for SWMU 16, or Addendum to the Phase I RFI Reports, to reflect the revisions described in the Responses submitted on August 2, 2007 by Baker Environmental on behalf of the Navy; and
- 2) revised Responses and revised Draft Phase I RFI Reports for SWMU 42 and AOC A, or Addendums to those Phase I RFI Reports, addressing comments given in the enclosed Technical Review dated September 7, 2007, and the results of the September 20, 2007 Conference Call.

Responses to EPA Comments on Draft Final RFI Report for SWMU 14 and Draft Phase I RFI Report for SWMU 68;

EPA has completed its review of the Responses submitted on July 20, 2007 by Baker Environmental on behalf of the Navy. Those responses address EPA's May 29, 2007 Comments on the Draft Phase I RFI Report for SWMU 68 (former Southern Fire Training Area), and Draft Final RFI Report for SWMU 14 (former "Crash-Crew" Fire Training Area). EPA has determined that the Response to comments on the SWMU 14 and SWMU 68 RFI Reports are not fully acceptable. Comments on the Navy's Responses are given in the enclosed Technical Review prepared for EPA by our consultant, TechLaw, Inc. EPA concurs with those comments. The EPA comments were discussed with the Navy and Baker Environmental during a conference call held on September 20, 2007. Based on that conference call, please submit by 45 days from the date of your receipt of this letter a revised Responses to Comments for SWMU 14 and for SWMU 68, addressing comments given in the enclosed Technical Review dated August 21, 2007, and the results of the September 20, 2007 Conference Call. As discussed during the September 14, 2007 Conference Call, because additional work is to be implemented as part of the SWMU 14 and SWMU 68 RFIs, revised RFI reports do not need to be submitted at this time; however, those revised reports shall be submitted within 60 days of completion of all additional work required to be implemented as part of those RFIs.

Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment for SWMU 14

EPA has completed its review of the above work plan submitted on July 20, 2007 by Baker Environmental on behalf of the Navy. EPA has determined that the Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment for SWMU 14 is not fully acceptable. Comments on the draft work plan are given in the enclosed Technical Review prepared for EPA by our consultant, TechLaw, Inc. EPA concurs with those comments. Please submit by 45 days from the date of your receipt of this letter a revised work plan, addressing comments given in the enclosed Technical Review dated August 22, 2007

Navy Responses to EPA's June 28, 2007 Comments on Draft Phase I RFI Reports on SWMUs 27, 28, and 29.

As discussed with the Navy and Baker Environmental during the conference call held on September 20, 2007, please submit by 45 days from your receipt of this letter, either revised draft Phase I RFI Reports on SWMUs 27, 28, and 29 or Addendums to those Reports, and Responses to the comments given in EPA's June 28, 2007 letter, and the results of the September 20, 2007 Conference Call.

If you have any questions, please telephone me at (212) 637- 4167.

Sincerely yours,



Timothy R. Gordon
Remedial Project Manager
Caribbean Section
RCRA Programs Branch

Enclosures (3)

cc: Ms. Josefina Gonzalez, PREQB w/encls.
Mr. Julio I. Rodriguez Colon, PREQB w/encls.
Mr. Pedro Ruiz, Naval Activity Puerto Rico, w/encls.
Mr. Dave Criswell, US Navy, BRAC PMO, w/o encls.
Mr. Mark Kimes, Baker Environmental, w/encls.
Mr. Andrew Dorn, TechLaw Inc., w/o encls.
Mr. Felix Lopez, USF&WS, w/o encls.

Encl. #1

**REVISED TECHNICAL REVIEW OF THE RESPONES DATED AUGUST 2, 2007
TO EPA AND TECHLAW COMMENTS
NAVAL ACTIVITY PUERTO RICO
DRAFT PHASE I RCRA FACILITY INVESTIGATION REPORT FOR
SWMU 16, 42, and AOC A**

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID No. PR2170027203**

Submitted to:

**U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866**

Submitted by:

**TechLaw, Inc.
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September 7, 2007

**TECHNICAL REVIEW OF THE RESPONSES DATED AUGUST 2, 2007
TO EPA AND TECHLAW COMMENTS
NAVAL ACTIVITY PUERTO RICO
DRAFT PHASE I RCRA FACILITY INVESTIGATION REPORT FOR
SWMU 16, 42, and AOC A**

**DRAFT PHASE I RCRA FACILITY INVESTIGATION REPORT FOR SWMU 42
(REPORT)**

GENERAL COMMENTS

Navy Response to EPA General Comment (regarding acrolein), Page 2 of 20: The Navy's response has partially addressed this comment. More information is required to assess why acrolein is not present. It is suggested that the Navy either validate their data or provide more information about the timeframe for acrolein application. The argument that acrolein was applied in a manner consistent with application does not preclude the need to evaluate this chemical since RCRA requires that all releases of hazardous waste or constituents be addressed.

Navy Response to EPA General Comment (regarding copper), Page 2 of 20: The Navy's response has not adequately addressed this comment. The response has not addressed the comment regarding copper as it only describes the results for vanadium. Ensure that the Report is revised as originally requested in Specific Comment 8.

Navy Response to EPA General Comment (regarding arsenic and vanadium in soil), Page 3 of 20: The Navy's response has not adequately addressed this comment. The comment discusses the probability plots for arsenic and vanadium used in evaluating the Upper Limit of Means (ULM) but does not adequately explain what these plots show or why they appear to show several populations. Probability plots are useful in visually determining whether a small data set follows a normal distribution and estimates the mean and standard deviation. However, these plots, although they fall below the accepted background concentration ULM, do not verify that there is no contamination. For example, *Figure 1 - Arsenic in Surface Soil* appears to show three separate populations and it is difficult to reconcile that all three populations are not reflective of arsenic contamination in surface soil although they do appear to fall below 2.59 mg/kg.

In addition, it is unclear why the data in *Figure 2 - Arsenic in Subsurface Soil* appears to form step patterns. These step patterns may be the result of different sampling rounds and/or reflect differing reporting limits. For example, the data included in the Table 3-1 of the October 2006 Background Report (Background Report) shows that the data was collected in 1999, 2000 and 2004. It is also unclear which data is shown in Figure 2. Is the arsenic subsurface soils data from the clay, fine sand/silt or weathered data? Arsenic subsurface soils also appear to show that there is some arsenic contamination in subsurface soils although below the ULM.

The vanadium background data raises similar questions related to sample collection times, reporting limit differences and the presence of multiple populations reflective of contamination. Please provide an explanation about why the probability plots differ from traditional probability plots; why they appear to show several different data populations; and acknowledge that the data may show arsenic and vanadium contamination, even though the concentrations are below the reported "background" levels. EPA has developed guidance to make valid comparisons between background concentrations and concentrations measured in soil samples at Superfund and RCRA sites. [EPA. 2002. Guidance for Comparing Background and Chemical Concentrations in Soil for CERCLA Sites. EPA 540-R-01-003. September 2002]. The background comparisons should be consistent with that guidance.

Navy Response to EPA General Comment (regarding a proposal for human health risks for potential exposure to lagoon sediment), Page 4 of 20: The Navy's response has partially addressed this comment. The response appears to address the comment for arsenic, vanadium and copper. However, more information is needed on acrolein. Please refer to the first comment discussing the Navy's response regarding acrolein. Furthermore, unless prior agreements have been made and/or the property is already restricted from residential development, please provide justification for the absence of an evaluation of future risk which would include an unrestricted land use scenario (i.e., consider performing the baseline human health risk assessment [HHRA] assuming that institutional or land use controls [IC/LUCs] are not in place and effective in precluding exposure) or quantitatively evaluate risk and hazard under residential land use conditions.

Navy Response to EPA General Comment (regarding unacceptable human health risks from potential exposure to lagoon sediment), Page 5 of 20: The Navy's response has not adequately addressed this comment. It is difficult to agree with the Navy's conclusion that the NAPR background groundwater set is representative of background conditions. The probability plot in Figure 5 appears to show several different populations of data reflected on the plot, but there is no discussion of potential contamination in groundwater although the concentrations are below the accepted background levels. Please refer to the General Comment response above regarding arsenic and vanadium in soil.

Navy Response to EPA General Comment (regarding a recommendation for Corrective Action Complete), Page 5 of 20: The Navy's response has partially addressed this comment. There does not appear to be a risk for arsenic, vanadium and copper at this time. However, more information is needed on acrolein. Please refer to the first general comment regarding the Navy's response concerning acrolein.

Navy Response to EPA General Comment (regarding background levels of vanadium in groundwater, Page 5 of 20): The Navy's response has not addressed this comment. It is difficult to agree with the Navy's conclusion that that the NAPR background groundwater set is representative of background conditions. The probability plot in Figure 5 appears to show several different populations of data reflected on the plot. Please refer to the General Comment response above regarding arsenic and vanadium in soil

SPECIFIC COMMENTS

1. Section 4.1 Soil Boring Advancement and Temporary Well Installation: The Navy's response has partially addressed Specific Comment 1. The sampling locations in Figure 4-1 of the Report vary from the proposed locations shown in Figure 3-5 of the approved Work Plan. If the soil borings are located as specified in the Work Plan, as stated in Navy's response, revise Figure 4-1 to show the actual sampling locations.

**TECHNICAL REVIEW OF THE RESPONSES DATED AUGUST 2, 2007
TO EPA AND TECHLAW COMMENTS
NAVAL ACTIVITY PUERTO RICO
DRAFT PHASE I RCRA FACILITY INVESTIGATION REPORT FOR
SWMU 16, 42, and AOC A**

**DRAFT PHASE I RCRA FACILITY INVESTIGATION REPORT FOR AOC A
(REPORT)**

SPECIFIC COMMENTS

4. **Section 4.2.2 Concrete Chip Samples:** The Navy's response has partially addressed Specific Comment 4. According to Section 3.6, Concrete Chip Sampling and Analysis Program of the Work Plan "if during the ½ inch deep sample collection procedure the field team has an indication that contamination may be below the top ½ inch, an additional sample will be collected from ½ inch to 1 ½ inches or deeper pending site conditions." Revise the RFI Report to provide the rationale for not collecting additional deeper concrete chip samples.

7. **Section 4.3.5 Equipment Rinsates:** The Navy's response has partially addressed Specific Comment 7. The Logbook in Appendix A.1 does not indicate whether the disposable stainless steel spoons were re-used for each sampling location. Furthermore, the response does not clarify why the equipment rinsate sample was collected a day before the concrete sampling, when the chisel would appear to be a non-disposable piece of equipment. Ensure that the report is revised as requested in Specific Comment 7.

8. **Section 5.5.2 STL Savannah SDG 22098-2:** The Navy's response has not addressed Specific Comment 8. The response has not explained why the sampling results for chip samples AOCACC02, AOCACC06, and AOCACC05 should be strictly qualified based on an equipment rinsate sample collected a day before the sampling date. As stated in Specific Comment 7, equipment blanks are collected to verify that non-disposable equipment have been adequately decontaminated. It does not appear appropriate to use an equipment rinsate sample collected a day before the environmental sample collection date to quantify data. Ensure that the Report is revised as requested in Specific Comment 8.

10. **Tables:** The Navy's response has partially addressed Specific Comment 10. Ensure that the Report is revised as requested in Specific Comment 10.

Encl. #2

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID NO. PR2170027203**

**TECHNICAL REVIEW OF THE NAVY RESPONSES TO
COMMENTS DATED MAY 29, 2007 (SWMU NOS. 14 AND 68)**

DATED JULY 20, 2007

Submitted to:

**U.S. Environmental Protection Agency
Region 2
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Submitted by:

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**Task Order No.
Contract No.
U.S. EPA TOPO
Telephone No.
TechLaw TOM
Telephone No.**

**002
EP-W-07-018
Timothy Gordon
212-637-4167
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August 21, 2007

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID NO. PR2170027203**

**TECHNICAL REVIEW OF THE NAVY RESPONSES TO
COMMENTS DATED MAY 29, 2007 (SWMU NOS. 14 AND 68)**

DATED JULY 20, 2007

The following comments were generated based on review of the July 20, 2007 *Navy Responses to Comments dated May 29, 2007*. Except as noted in the General and Specific Comments below, the Navy's responses to comments are adequate.

GENERAL COMMENTS

1. The Navy's responses to EPA's General Comment regarding the validity and use of the October 17, 2006 "Revised Final Summary for Environmental Background Concentrations for Inorganic Constituents Report" (Background Report) is not adequate at this time. The EPA noted that "the base-wide background concentrations for arsenic, lead, and particularly vanadium ... may not be fully representative of natural background conditions in the SWMU 68 area and/or may have been impacted by contaminant releases." Specifically, the EPA states that three of the subsurface soil samples used in the Background Report "were collected during the 2004 Environmental Conditions of Property (ECP) investigations at what subsequently became identified as SWMU 68" and that "all [three samples] may have been impacted by contamination, based on reported indications of 'DRO' (diesel range organics) in those samples." In addition, the EPA notes that there is no rationale provided in the Background Report as to why vanadium would occur naturally at such high concentrations at this site.

In response, the Navy provides a statistical comparison to U.S. Geological Survey (USGS) vanadium data for Puerto Rico. The logic of comparing 19 vanadium sample results to 292 vanadium sample results is unclear. The text on page 2 states "As evidenced by Table 1, the range of vanadium concentrations within the NAPR background data set falls within the range of concentrations within the USGS data set." The USGS data set is so large, taking into account the entire island of Puerto Rico, and the range is so broad that it appears that any data would fall within this range. In addition, this does not appear to address the question of the site specific concentrations at SWMU 68, which may pose a current or future risk to residential or industrial users.

Based on this, it appears that supplemental discussion is necessary for this response. First, the Navy should address more specifically those samples identified above by EPA and discuss whether they may themselves be impacted by contamination. Second, additional information regarding the USGS data should be provided to confirm that this data is an adequate standard for comparison to base-wide data. Finally, additional discussion is necessary to address EPA's concern regarding the lack of rationale provided as to why vanadium would occur naturally at such high concentrations at this site.

2. The Navy does not provide sufficient information regarding the summary statistics for either the Background Report data or the site specific data. Without additional information regarding these statistics, the following concerns were identified:

Table 2, Summary Statistics and Results – Vanadium in NAPR Background and SWMU 68 Surface Soil, states that the surface soil data for vanadium is normally distributed. Based on Figure 1, Probability Plot of Vanadium in NAPR Background Surface Soil, this appears inaccurate. Figure 1 appears to show left skewness and/or potentially a mixture of several normal distributions.

Table 3, Summary Statistics and Results – Vanadium in NAPR Background and SWMU 68 Subsurface Soil, and Table 4, Summary Statistics and Results – Vanadium in NAPR Background and SWMU 68 Groundwater, indicate that the subsurface soil and groundwater data are lognormally distributed. However, Figure 2, Probability Plot of Vanadium in NAPR Background Subsurface Soil, and Figure 3, Probability Plot of Vanadium in NAPR Background Groundwater, are labeled “Normal Distribution.” These figures should be log plots.

Finally, it appears that in parts of the analysis, the Navy compares different types of distributions to one another. For example, in Table 6, Summary Statistics and Results – Arsenic in NAPR Background and SWMU 68 Subsurface Soil, gamma and lognormal distributions are compared. In addition, Figure 7, Probability Plot of Arsenic in NAPR Background and SWMU 68 Subsurface Soil, compares both these data sets on a plot labeled “Normal Distribution.”

For each data set presented in this document, provide summary statistics regarding distributions, skewness, kurtosis, correlation coefficients, etc. In addition, update the probability plots as discussed above where discrepancies are present. Finally, discuss why the same element has different distributions at the site and please provide rationale as to why this information can be compared in the manner currently presented.

3. As described in the tables provided, the term “positive detections” is not adequately defined. Define this term and discuss how the detection limits are treated within these statistical tests.

SPECIFIC COMMENTS

1. **Navy Response to EPA Comment No. 1, SWMU 68, Page 3.** The third paragraph of this response concludes with “For each medium, the maximum, mean, and 95% UCL background concentration exceeds maximum, mean, and 95% UCL concentrations for SWMU 68.” This statement is incorrect. As stated in Section 5.3, Subsurface Soils, of the Phase I RCRA Facility Investigation Report for SWMU 68, NAPR dated March 26, 2007 (SWMU 68 Report), and as reiterated by the EPA General Comment, “vanadium exceeded its background screening level at ... one location.” Please revise this response to account for this discrepancy.

In addition, since vanadium does exceed background chemical levels in this subsurface sample, further discussion is necessary to adequately respond to EPA Comment No. 2 for SWMU 68. Specifically, the Navy should provide additional discussion as to the potential human health risks resulting from vanadium in the subsurface soil.

2. **Navy Response to TechLaw Specific Comment No. 6, SWMU 68, Page 9.** This response is not adequate at this time. As indicated in TechLaw’s original comment, the arsenic contamination identified on the northern portion of the site was not adequately bounded to the north in the initial investigation. The final sentence of TechLaw’s comment states “If this statement cannot be supported by a statistical analysis, identify additional arsenic characterization and remediation as an activity for future work at SWMU 68.” Based on the statistical analyses presented, the arsenic contamination located at the northern portion of this site is not representative of natural background concentrations. Therefore, additional characterization of this contamination is warranted, specifically to define the extent of contamination to the north

Encl. #3

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID NO. PR2170027203**

**TECHNICAL REVIEW OF THE Draft Additional Data Collection
Work Plan in Support of Ecological Risk Assessment, SWMU 14**

DATED JULY 20, 2007

Submitted to:

**U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866**

Submitted by:

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Task Order No.	002
Contract No.	EP-W-07-018
U.S. EPA TOPO	Timothy Gordon
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August 22, 2007

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO
EPA ID NO. PR2170027203**

**TECHNICAL REVIEW OF THE Draft Additional Data Collection
Work Plan in Support of Ecological Risk Assessment, SWMU 14**

DATED JULY 20, 2007

Please find below TechLaw's review of the *Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment, SWMU 14* (WP), Naval Activity Puerto Rico EPA I.D. No. PR2170027203 Ceiba, Puerto Rico, dated July 20, 2007.

The WP provides only a partial sampling approach to address the data gaps in the Screening Ecological Risk Assessment (SERA) and generate data in support of the Baseline Ecological Risk Assessment (BERA). Several technical issues are identified below, which will require further clarification before the WP can be implemented.

GENERAL COMMENTS

1. The WP addresses data gaps from past studies. These data gaps were large enough that a full evaluation of ecological risk from exposure to soil, surface water and sediment could not be completed. The WP proposes only to collect additional soil samples without obtaining surface water and sediment samples. The WP describes a "somewhat phased" approach pending the proposed soil sample results. It is indicated that additional media may be sampled only if the soil analysis yields concentrations above 'ecologically important values'. The most 'valued ecological resource' in the area is the adjacent wetland (PEM1). It is critically important to sample the entire flow pathway from SWMU 14 to and including the wetland. The analytical results (soil sediment and surface water) will then provide the data to assess the ecological risk concerns with the wetland. Revise the WP to include a surface water and sediment sampling component for the wetland.
2. The WP refers to 'ecologically important concentrations' several times (Subsection 1.1, second paragraph) without clearly defining the meaning of this term. It is later defined (Subsection 2.4.3, pg 2-6) as 'concentrations that are greater than soil screening values and statistically elevated above background concentrations'. This definition indicates that 1) the soil screening values have already been identified, and 2) a method has been developed to establish background concentrations and make statistical comparisons. Both the soil screening levels and background evaluation method need to be described to complete the WP. Several resources were referenced (e.g., Baker, 2006 'Final Summary Report for Environmental Background Concentrations of Inorganic Compounds') without

describing how these resources would be used with the new data. The WP needs to be revised to provide a complete list of soil screening values (and their sources) and to describe the method for background comparisons that will be used in the revised SERA and BERA.

3. It is unclear in the WP how the fire pit will be handled in the future (refer to Subsection 2.3). It is unknown if the pit will remain as is or will be returned to a more natural setting. Future use is an important consideration to the SERA/BERA process as it may affect the choice of assessment and measurement endpoints. If SWMU 14 is to retain a physically disturbed character, then potential for ecological risk can be placed into context with the surrounding land use. On the other hand, if SWMU 14 were to transition to more valuable habitat, then a more thorough evaluation of risk may be warranted since exposure settings could change over time. Please revise the WP to describe the anticipated future land use for SWMU 14 and whether this use would affect the scope of work described in the WP.
4. Excluding groundwater from the ERA process is not well supported. The general statements describing the groundwater setting (bullet points on page 2-5) are not supported by quantitative groundwater flow information. A groundwater connection to the adjacent wetland cannot be excluded in the absence of groundwater flow pathway information. Please update the WP to include more substantial information to support the position that groundwater does not represent an exposure point for ecological receptors.
5. The WP indicates that samples will be analyzed for a targeted set of chemicals (PAHs and metals) which were detected in earlier studies. It is suggested that the organic carbon (OC) content and pH of the soil samples be measured. The OC content will provide an indication of bioavailability for the PAHs if the soil were to become sediment. Certain metals (e.g., aluminum) also become bioavailable at specified pH levels. Integrating chemical concentrations with OC and pH will help support more definitive risk conclusions. It is suggested that these two parameters be included in the analysis program.
6. The WP proposes to analyze a single surface soil sample for dioxins/furans. It appears that this minimalist approach is attributable to the lack of a source associated with past activities at the pit. Regardless, the WP needs to clearly state the rationale behind the decision to analyze only one surface soil sample for dioxins/furans.
7. The WP needs to be thoroughly revised in order to link the figures to the text. It is unclear what purpose the figures serve and why certain types of information are provided within them (e.g., polygons of information in Figure 1-2). It is also suggested that the location of the PEM wetland be clarified in Figure 3-1 in order to place the proposed sampling program in relation to the target wetland. Please revise the WP and include only those figures with relevant information to the project.

8. Table 2-1 summarizes the previous SERA findings. However, in order to better understand the potential risk conditions, it is suggested that the actual calculated HQs for those detected chemicals with HQs > 1 be presented. This additional information will highlight which chemicals are the import risk drivers. Please revise Table 2-1 to include the actual, calculated HQs for the detected chemicals.