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757-322-4815

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AUG 12 2003

Mr. Adolph S. Everett, P.E.
Acting Chief
RCRA Programs Branch
U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, New York 1007-1866

Re: Atlantic Fleet Weapons Training Facility (AFWTF), Vieques Island, PR, Site Specific RFI Work Plans Implementation Schedule, EPA I.D. # PRD980536221

Dear Mr. Everett:

Based on the knowledge learned during the bi-weekly Vieques Teleconference Call held on August 7th 2003 between the participating government agencies, the Navy understands that the United States Environmental Protection Agency (EPA) will be issuing a public notice on August 11th, 2003 regarding EPA's responses to the public comments received in association with the RCRA Facility Investigation (RFI) Work Plans developed pursuant to the January 2000 RCRA Administrative Order for AFWTF. The purpose of this letter is to advise EPA that the implementation schedule submitted in the RFI Work Plans require certain modifications to reflect changed conditions and knowledge gained since the work plans were originally developed and submitted to EPA in 2001. The Navy is committed to commence implementation of the RFI Work plans pursuant to the conditions of the Order. However, revisions to the sequence and duration of activities is necessary at this juncture in order to address high interest community concerns, additional technical and archival knowledge, as well as logistical restraints.

The schedules in the 2001 Site Specific RFI Work Plans, 2001 Groundwater Baseline Investigation, and Navy proposed Soil And Groundwater Background Investigation were developed as independent activities that begin with the same start dates. The activities in each of the Work Plan schedules were never integrated during the latest review/response period to reflect the logic for conducting the Groundwater Baseline Investigation and Soil and Groundwater Investigation as precedent activities to the implementation of the activities presented in the RFI

Investigation Work Plans. The completion of these activities in a logical sequence are critical to the decision making aspects when comparing and considering the results of the data collected during the RFI Investigations. Based on the experience with environmental background issues associated with West Vieques activities, the establishment of a scientifically sound groundwater baseline and soil and groundwater background conditions are of paramount importance to all stakeholders, especially when moving forward with the analysis and necessary decision making criteria needed when determining environmental and human health risks of the sites under examination (i.e. Solid Waste Management Units (SWMU's) and Potential Areas of Concern (PAOC's)). As well, knowledge learned from both the Draft Preliminary Range Assessment and Draft Environmental Baseline (currently under revision by the Navy) suggests that the proposed locations of soil and groundwater wells and sampling locations require further examination and discussion between Navy and EPA technical personnel. This is discussed further in the Navy's responses to public comments that the Navy submitted to EPA in June 2003.

In addition, logistical and resource availability have changed considerably during the last two years since the draft Final Work Plans were originally submitted. The time durations depicted in the implementation schedule were based on critical logistical support from AFWTF and Naval Station Roosevelt Roads (NSRR). The logistical and surface water transportation support is no longer available since the Navy transferred the AFWTF Training Range and Camp Garcia property to the Department of Interior on May 1st, 2003. These changed conditions significantly impact certain activity time durations in the implementation schedule.

Based on the discussion above, the Navy proposes to revise the schedules depicted in each of the Work Plans into one integrated precedent type schedule that reflects the logic and critical path activities associated with the concerns presented in this letter. In general, the Navy recommends that the investigation and draft reports for the Groundwater Baseline and Soil and Groundwater Investigation be completed prior to implementing the investigations for the SWMU's, PAOC's, and PI's. A revised schedule reflecting these conditions will be prepared and submitted to your office within 30 calendar days from the date of this letter. The revised schedule will also address the submission of a revised Soil and Groundwater Background Investigation.

Due to these proposed revisions, the Navy anticipates that the implementation of the Groundwater Baseline and Soil and Groundwater Background investigation may be delayed an additional sixty to one hundred and twenty days beyond EPA's anticipated

time frame of October 2003. Early collaboration between Navy and EPA technical representatives regarding the proposed changes will facilitate an earlier implementation date of the work plans. The Navy recommends that a meeting between technical representatives occur within 45 calendar days to discuss the proposed changes to the groundwater well and soil sampling locations. The Navy will submit a revised Draft Final Work Plan within 45 calendar days upon agreement of the technical changes.

The Navy looks forward in addressing these technical issues with you and your staff. Please advise me of available dates that are convenient to meet with you and your staff to discuss these matters. If you have any questions, please don't hesitate in contacting me at 757-322-4815.

Sincerely,

Christopher T. Penny, REM
Designated Navy Project Coordinator
Caribbean Section and Other
Installations
Environmental Programs Branch
Environmental Division
By direction of the Commander

Copy to:

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