



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Boqueron Field Office  
P.O. Box 491  
Boqueron, Puerto Rico 00622



November 20, 2002

Acting Chief  
RCRA Program Branch  
USEPA Region II  
290 Broadway, 22 floor  
New York, NY 10007-1866

Re: Final Work Plans RCRA Facility Investigations  
Eastern Vieques

Dear Sir:

This is to follow up our Nov 7, 2002 letter regarding the four documents regarding the Atlantic Fleet Weapons Training Facility and Eastern Maneuver Area at Vieques Island, Puerto Rico. The Service is deeply interested in the RCRA process that is ongoing in this area. The Navy just released an EA/FONSI regarding the transfer of these lands to the Department of Interior (DOI). The document states that the Navy will identify and remediate, as necessary all sensitive sites. It also states that the Navy will perform rededication of hazardous waste contamination and munitions and explosives of concern.

Will the RCRA process continue once all active military training ceases on Vieques and the lands are transferred to DOI, or will the sites come under CERCLA? With the transfer of these lands to DOI, will additional sites that have been previously identified in the Current Conditions Report but did not form part of the Consent Order be included? We are concerned as well with the fate of the active and inactive small arms ranges found on Vieques. Once the Navy leaves, they will become a source of metal contamination through storm water runoff, exposure to contaminated soil, ingestion or transport by contaminated dust.

In regards to the 12 sites that are part of the existing Consent Order we believe that SWMU 1, the Camp Garcia Landfill poses the greatest potential for possible contamination. At the time the landfill was operational environmental regulations governing the proper disposal of many wastes did not exist. This may lead to isolated hot spots in the older cells. The sewage treatment lagoons SWMU 10 is another site that has potential for contamination and exposure to wildlife since they still hold some water and can be considered an attractive nuisance to wildlife. Many of the other sites are in the Camp Garcia area and are associated with buildings having very localized impacts.

We are concerned with the photo identified sites that had prolonged periods of scarred or discolored areas. The soil in these sites should be screened at various depths. Possible fill areas that have been photo identified are also a concern since they could indicated burial of materials and should also be investigated as well. It would be safe to suspect that Department of Interior Trust Resources may have been impacted by one or more of the SWMU, AOC, PAOC's and PI sites that have been identified in eastern Vieques.

EPA should include the near shore marine areas in the Current Conditions Report. Various questions have been raised about the use of barges and ships as targets by the Navy. These vessels are said to have contained numerous drums and cylinders or perhaps even oil, which may pose a risk to the environment. To our knowledge the exact number of these vessels around eastern Vieques has not yet been determined. Since they may pose an environmental risk, we recommend that EPA add these to the possible AOC's in the area.

Figure 1-3 of the Groundwater Baseline Investigation shows groundwater practically following the current AFWTF property line. Since there is a wetland continuum between Puerto Ferro and Puerto Mosquito, it should be safe to assume that some of the ground water flows into Puerto Mosquito as well. Our concern is that Puerto Mosquito is one of the most important Bioluminescent Bays in US territory. As stated in the Project Objectives, it must be determined if there has been impacts to the ground water and if those impacts are likely to migrate offsite. We believe that at least some monitoring wells should be installed in the Puerto Mosquito side of the existing security fence to determine if there is any migration towards this ecologically sensitive area.

Thank you for the opportunity to comment on these documents, if you have any questions please feel free to contact Felix Lopez of our office at 787-851-7297 ex. 26.

Sincerely,



Carlos A. Diaz  
Acting Field Supervisor

fhl

cc:

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