

6/13/03 - 02279



COMMONWEALTH OF PUERTO RICO / OFFICE OF THE GOVERNOR

To: Christopher Penny Fax: 757-322-4805

From: PR Environmental Quality Board Date: 6/13/03

Re: PRA Comments Pages:

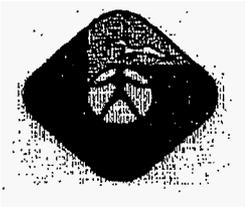
CC: Felix López (787) 851-7440  
Carlos Ramos (212) 637-4943

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**YARISSA MARTINEZ, ENG.**

EDIFICIO NACIONAL PLAZA / AVE Ponce de Leon 431/HATO REY, P.R.



COMMONWEALTH OF PUERTO RICO  
OFFICE OF THE GOVERNOR  
ENVIRONMENTAL QUALITY BOARD

June 13, 2003

Mr. Christopher T. Penny  
Remedial Project Manager  
Naval Facilities Engineering Command  
Atlantic Division, Code EV 23  
1510 Gilbert Street  
Norfolk, VA 23511-2699

Dear Mr. Penny:

The Puerto Rico Environmental Quality Board (EQB) respectfully submits to the U.S. Department of the Navy the ~~comments~~ contained herein regarding the environmental investigation on the East Side of the Vieques Island.

If you have any questions or comments, do not hesitate to contact Yarissa Martinez at 787-365-8573.

Cordially,

Esteban Mujica Cotto  
President

cd Susan Silander, Fish & Wildlife Services  
Carlos Ramos, EPA Region II

Enclosure



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**EQB Comments on the  
 Preliminary Range Assessment,  
 Vieques Naval Training Range, Puerto Rico  
 Dated April 2003**

**Comments Developed June 13, 2003**

1	1-1	1.0	Third paragraph states, "Interior would administer the Live Impact Area (LIA), ..., as a "Wilderness Area" with no public access." Is this established fact or is there some portion of the LIA that is planned for use involving public access? Recommend supporting this statement by attributing the source at DOI.
2	2-6	2.2.2.1	The statement, "However, live ordnance was not used on a regular basis until 1974" is not supported by data in the report. The ARS report only presents range utilization data beginning in 1974, but this doesn't mean live ordnance wasn't used in significant quantities before that time. Elsewhere in the report it states that the EMA was heavily used in the 1950s and 1960s (2.2.3.3) and that the LIA was established in 1964. Recommend removing this statement.
3	2-14	Table 2-6	This is the first instance in the report where 40-mm HE projectiles are grouped with small arms ammunition. This is a dangerous precedent because 40-mm HE projectiles (sometimes incorrectly referred to as 40-mm grenades) are high explosive projectiles designed to detonate and fragment and small arms are not. Highly recommend checking all of the text and tables in this document to change all references to 40-mm HE projectiles as "small arms" and "Rifle Grenades" to "40-mm HE projectile grenades".
4	2-15	2.2.2.3	The first sentence references "... nine ranges .... may have existed historically at the EMA, ..." Are these nine ranges in addition to the ranges listed on page 2-14?
5	2-15	2.2.2.4	There is no support for the statement, "Since training commenced in the 1940s, more than 700,000 items of live and inert munitions have been expended without a single round falling outside the limits of the Inner Range Complex (Pace-Fallon, 1999)." Recommend removing this statement.
6	2-17	Table 2-7	This table notes that "2.75" HE Warhead" were recovered from VNTR. However, it was previously stated that inert 2.75-in. rockets were most frequently used (Table 2-1). Recommend removing the notation (inert) from Table 2-1.
7	2-19	2.2.3.3	This section notes that three additional ranges were identified during photo analysis. However, review of Figure 2-5 indicates that Range 4 is actually



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			three distinct ranges (4A, 4B, and 4C) that are not connected to each other. Recommend changing the number of ranges discovered by the photo analysis to 5.
8	2-20	2.2.4	This section notes the use of DU projectiles. However, the text does not provide the location of this event. Recommend providing the location of the use of DU projectiles.
9	3-4 3-17	Table 3-1 3.2.17.3	There is documented use of 3.5-in rockets on Range 4. Recommend adding this ordnance use to the table.
10	3-9 and 3-10		Please explain the difference between a "Gun Emplacement/Position (G-7)" and a "Gun Emplacement/Position (GP-1)". What is the difference between a "G" and a "GP" designation?
11	3-12	3.2.10	Why is "Air to Ground Target (GP-7)" given the GP designation as if it were a gun position? Please explain.
12	3-13	3.1.12	Why is "Former Gun Position (OP-5)" given a designation as an "OP"? The reviewer is becoming confused by the use of the designations "G", "GP", and "OP" and how they relate to "gun positions" and "targets".
13	3-14	3.2.13	It is highly recommended that the water surrounding the "Ordnance Transport/Offloading Location (p1-9 East)" be investigated for the presence of MEC.
14	3-15 3-16 3-17 3-19	3.2.14.3 3.2.15.3 3.2.16 3.2.18	This section refers to "practice grenades" and the reviewer is not sure what MEC is being referred to here because the term "practice grenades" is used elsewhere to refer to practice 40-mm projectile grenades. Recommend reviewing these references and making a distinction between "practice hand grenades", "40-mm HE projectile grenades", "practice 40-mm projectile grenades", and "rifle grenades". There are safety issues associated with these different MEC and safety would be served by being as accurate as possible with these identifications.
15	3-21	3.2.20.3	Please define the term "lay down area".
16	4-2	Table 4-1	<ol style="list-style-type: none"> <li>1. Range 4 is actually three ranges (4A, 4B, and 4C).</li> <li>2. Range 3 was used for 40-mm HE projectile grenades.</li> <li>3. The approach road to Target 2 and other areas of interest are not included on this table,</li> <li>4. It is not substantiated that PI ranges 7, 8, and 9 were only used for small arms.</li> </ol> <p>Recommend making the above changes and additions to this table.</p>
17	4-4	4.1.2	Recommend adding "dropping (bombing)" to the Primary Release Mechanisms and adding a subsection on this release mechanism.



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18	4-4	4.1.2.1	<ol style="list-style-type: none"> <li>1. Recommend adding "Naval Gunfire" to this section.</li> <li>2. Recommend changing the use of Range 3 to "40-mm HE projectile grenades".</li> <li>3. Range 4 is actually Range 4A, 4B, and 4C. Also, recommend adding "40-mm HE Projectile Grenades", "Dragon", "LAW", and "AT-4" to the munitions used on Range 4A, 4B, and 4C.</li> </ol>
19	4-5	4.1.2.3	Recommend adding the "Ordnance Transport/Offloading Location (PI-9East) as a potential burial area based on the description in section 3.2.13.
20		Figure 4-3	<ol style="list-style-type: none"> <li>1. Recommend adding hand grenades, 40-mm HE projectile grenades and AT-4 to the "surface to 4-ft." depth category,</li> <li>2. Recommend removing the terms "Unrestricted" and "UXO construction Support" from the depth matrix descriptions because this figure is meant to only show the likely depth of penetration of the various MEC, not to evaluate the appropriateness of cleanup depth requirements on the former VNTR.</li> </ol>
21	4-8	4.2	References "62 MEC areas". Recommend identifying these 62 areas. On Table 5-1 the reviewer counts 63 areas not 62. Also, are Ranges 4A, 4B and 4C being counted as one range or three?
22		App. A	It has been suggested that there is a significant amount of information on VNTR at the museum at Marine Corps Base Quantico, Virginia. Recommend investigating this source.
23	14	App. A Table 6	<ol style="list-style-type: none"> <li>1. 16" 50 is noted under "Live" ordnance used on VNTR. However, earlier it was stated (in the body of the report) that only inert 16-in, projectiles were used. Please correct the earlier reference to only inert 16-in. projectiles being used,</li> <li>2. Recommend including other documented MEC use before 1974 such as 2.36-in and 3.5-in. rockets.</li> <li>3. 20-mm, 30-mm and 40-mm should not be included under "small caliber". They should be moved to the "Live" column. Also, what are the MK-14 and MK-16 listed under "small caliber"?</li> <li>4. What is the MEC referred to as "Tank" under the column "Live"?</li> </ol>
24	24	App. A	The entries "NA" under the column "totals" for ATG and NGF "Total Weight of HE in Ordnance Dropped" must be incorrect since ordnance is listed as being dropped during years 1974 through 1981. Recommend correcting this error.
25		App. D	Since VNTR was used so intensively and for such a long period of time until recently it is highly likely that there are many knowledgeable persons that participated directly in training on VNTR that can add to the body of knowledge. Recommend searching out former Marines and Navy training



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			managers for VNTR to get additional information.
26	1	App. E	The footnote at the bottom of the page states that this addendum report does not include analysis of the LIA "located at the far eastern side of Vieques." However, the ECA, not the LIA, is located at the far eastern side of Vieques. Is this footnote in error and was it the ECA that was not included? If so, it would be valuable include aerial photo analysis of the ECA to help determine the amount of MEC remaining in his area.