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United States Department of the Interior



FISH & WILDLIFE SERVICE

Boqueron Field Office

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APR 18 2005

Mr. G. Brett Doerr
CH2MHILL
5700 Cleveland St
Suite 101
Virginia Beach, VA 23462

Re: Site Specific Work Plan, Phase I RCRA
Facility Investigation for Eight PI/PAOC
Sites, Former AFWTF, Vieques, Puerto
Rico

Dear Mr. Doerr:

Thank you for requesting our comments on the above referenced work plan. This plan is for 8 photo identified (PI) potential areas of concern (PAOC) that were identified during the Phase I RCRA Facility Investigation. The work plan includes two PI sites (PI-4, PI-7) and six PAOC (PAOCs J, K, L, N, S, and U). The plan is to determine whether a release of hazardous materials occurred and characterize the nature and extent of contamination.

Of the eight sites listed, the Service is primarily concerned with two of the sites, PI-7 and PAOC S.

PI-7 Former Quarry, Tar Disposal Area and Construction Debris Area: This site was inspected during the June 2003 joint site inspection with EPA, EQB, FWS and Navy personnel. At that time several dozen drums were found partially buried or crushed in the woods at the foot of the existing quarry. Some drums were stained with tar, some were labeled fuel some were both. These were found less than 100 meters from the existing dirt road (see enclosed photos).

Currently there are six additional surface and subsurface soil sampling points being proposed. We recommend that prior to the final determination of the additional sampling points, a through reconnaissance of the area should be conducted to place the sampling points in the areas with the highest probability of contamination such as the drum area.

PAOC-S, former fuel pipeline. Currently there are only 4 proposed surface soil and subsurface soil sampling points proposed. Records show the pipeline was removed in 1984. The reference for this is the 2003 Draft Environmental Baseline Survey (EBS). This document cites demolition records which state that the pipeline was demolished in 1984. However, copies of the demolition records are not provided in the EBS. We recommend copies of these demolition records be obtained in order to properly determine what type of pipeline, whether it was buried or above ground or both, and any other

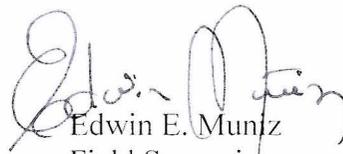
additional information which would be useful in determining the sampling scheme for this site.

The former pipeline crosses the northern boundaries of the Bahia Tapon wetlands. From the aerial photos it appears that some sections of the pipeline route run within a few meters of these wetland areas. The saltflat areas of the northern Bahia Tapon wetlands suffered high sedimentation rates from adjacent upland erosion (Lewis 1981). Since the fuel line ran close to this wetland area in several locations, we recommend that surface samples be taken immediately within the saltflat area. Because of past high sedimentation rates and the use of the area by land crabs we recommend that surface soils samples be taken to a depth of 24 inches.

Several of the sites are located within the existing Camp Garcia area. We recommend close coordination with Vieques National Wildlife Refuge staff in order to facilitate the sampling and minimize impacts to Refuge operations.

Thank you for the opportunity to comment on this project, if you have any questions please contact Felix Lopez of my staff at 787 851-7297 x 226.

Sincerely yours,



Edwin E. Muniz
Field Supervisor

fhl

cc:

EPA, Vieques

Vieques NWR, Vieques

NMFS, New Jersey

Yarissa Martinez, EQB, San Juan

Tim Gordon, RCRA, EPA, New York

Christopher Penny, US NAVY, Norfolk, VA

John Tomik, CH2MHILL, Virginia



Photo 1, A section of the drum field found in PI-7 at the foot of the old Quarry site



Photo 2, Tar stained drum marked "FUEL" partially buried in debris.