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MAR 14 2001

U.S. EPA Region II
Attn: Ms. Nicoletta DiForte
Chief, RCRA Caribbean Section
290 Broadway - 22nd Floor
New York, NY 10007-1866

SUBJECT: Atlantic Fleet Weapons Training Facility, Vieques
Island, PR
EPA I.D. #PRD980536221
USEPA Comment ltr dtd November 29, 2000

Dear Ms. DiForte

Enclosed is the Navy response to the Environmental Protection Agency (EPA) letter dated November 29, 2000 regarding EPA's comments on the following four documents submitted on September 30, 2000 for the Atlantic Fleet Weapons Training Facility (AFWTF) at Vieques, Puerto Rico:

1. Draft RCRA Facility Investigation (RFI) Master Work Plan
2. Draft Site Specific Work Plan for the Phase I RFI
3. Draft Description of Current Conditions Report
4. Draft Work Plan for the Groundwater Baseline Investigation

Comments addressing the four above-mentioned documents were received from USEPA on December 7, 2000. As per Sections VI.B.1 and VI.F.1 of the Administrative Order on Consent (Docket No. RCRA-02-2000-7301), the Navy's responses are provided in Attachment A. The revised documents that incorporated EPA'S comments were submitted to your office under separate cover on February 20, 2001.

The draft documents submitted on September 30, 2000 were prepared based on the results of a Joint Interest Group (JIG) meeting held between the Navy, EPA and CH2MHill on August 8th and 9th in CH2M Hill's Tampa, FL office. During the JIG meeting, EPA

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and the Navy collaborated on an effective technical strategy for the RFI Phase I investigation of nine Solid Waste Management Units (SWMUs) and three Areas of Concern (AOCs) identified in the Order. However, the Navy notes that the nature and extent of EPA's comments of the September 30th submission that are inconsistent with the strategy that was agreed upon at that meeting. A conference call was held on January 26, 2001 to discuss these significant issues addressed in EPA's comment letter. A meeting summary of that conference call is provided as Attachment B. Based on those discussions during the conference call, the Navy understands that EPA will not be soliciting comments from Puerto Rico Environmental Quality Board (PREQB) nor will EPA require a public comment period on the four final documents submitted by the Navy on 20 February 2001. Because of the high public concern about Public Health and the environment on Vieques, the Navy recommends that a public comment period be implemented prior to any field investigations.

On the attached comment/response document, the responses to each comment are shown in bold italics. The comments are listed in the order they were received from USEPA and are numbered sequentially.

Unless a public comment period is in effect, the Navy is requesting a written approval response from USEPA for the four documents referenced above within 90 days of the date of this letter.

If there are any questions, please do not hesitate in contacting me (757) 322-4815 or Ms. Madeline Rivera at (787) 865-5337.

Sincerely,

C. T. PENNY, REM
Project Coordinator
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Enclosures

Copy to: (w/encls)

NAVSTA Roosevelt Roads (Mr. Rivera, CAPT Warnecke)

CH2M Hill (Mr. Tomik)

CH2M Hill (Mr. Clasen)

PREQB (Ms. Aissa Colon)

EPA Carribbean Office (Mr. Soderberg)

CNRSE (CDR Young)

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