

10/13/03-02319

October 13, 2003

Division of Environmental Planning and Protection  
U.S. Environmental Protection Agency  
Region 2  
Attn: Mr. Walter Mugdan, Director  
290 Broadway  
New York, New York 1007-1866

Re: Atlantic Fleet Weapons Training Facility (AFWTF), Vieques Island, PR, Approved RFI Work Plans; EPA I.D. # PRD980536221

Dear Mr. Mugdan::

This letter is in response to your letters of September 12th and October 3rd, 2003 regarding EPA's approval to implement the RCRA Facility Investigation Work plans. It was the Navy's understandmg, based on EPA's public meeting in Vieques on July 2, 2003 that with the future listing of the AFWTF site on the CERCLA Superfund National Priorities List that the environmental sites on eastern Vieques would be investigated under CERCLA. This process would be a collaborative effort between the Navy, EPA, DOI, PREQB and the community through the implementation of a Federal Facilities Agreement. However, based on your October 3, 2003 letter we now understand that EPA intends to conduct the investigations in accordance with the requirements of the January 2000 RCRA 3008 (h) Order on Consent between the Navy and EPA.. Although the Navy supports PREQB's and the community's recommendation that the environmental restoration of eastern Vieques be completed under CERCLA, through the NPL listing, the Navy is willing to proceed under the current RCRA regulatory program.

The Navy is looking forward to proceeding with the implementation of the Environmental Restoration Program at east Vieques. It has been over two years since EPA approved the Final RFI work plans that were submitted by the Navy to EPA in September, 2001. However, we recognize that EPA's approval was conditional based on public review and comment.

In accordance with your October 3, 2003 letter and Section 6 of the September 2001 Final Site Specific Work Plan Phase I RFI (revised in June 2003), the Navy shall commence implementation of the RCRA work plans no later than 60 days from the receipt of your approval letter on October 16, 2003.. In addition , within 60 days of receipt of your October 3, 2003 letter and in accordance with Section VI.F.2 of the January 2000 Order, the Navy shall commence implementation of the approved September 2001 Final Work Plan for Groundwater Baseline Investigation at U.S.Navy's Eastern Maneuver Area, Vieques. During the next 60 days we will be initiating the initial steps of the work plans which is to solicit subcontractor bids for the field investigations and prepare purchase orders for the selected subcontractors.. Due to potential scheduling conflicts and multiple mobilizations over the holidays, we intend to be in the field on Vieques during the week of January 5, 2003 to initiate the field tasks of the RCRA Facility Investigation and the Groundwater Baseline Investigation.

Pursuant to Section VI.B.5 of the January 2000 Order, within 90 days of completing the implementation of all work required under the Phase I RFI Workplan, the Navy shall submit to EPA for review and approval a draft Final Phase I RFI Report. Because the Background Investigation Work Plan in as integrated part of the RFI Investigation, the Draft Phase I RFI Report will be submitted to EPA 90 days following the Navy's receipt of the validated analytical results required under the Background Investigation.

October 27, 2003

As you are aware, the integration of the Background Investigation into the RFI has not only been approved by EPA but is required under the RCRA regulations, and is required under Navy policy for conducting investigations under the Environmental Restoration Program. Furthermore, based on the Navy's experience in the CERCLA investigations completed on western Vieques, neither PREQB or the community would accept a Site Investigation Report, either under RCRA or CERCLA, without an approved background investigation. The Draft Work Plan and Sampling and Analysis Plan Soil and Groundwater Background Investigation AFWTF Vieques Island Puerto Rico will be submitted to you under a separate cover within the next week..

Following your review and comment on the Background Investigation Work Plan we propose to meet with you to discuss the items identified in your September 12, 2003 letter including:: the revised background sampling locations; proposed work for the PAOCs and PIs; future activities anticipated for SWMUs #3, #9 and # 11; the closure of the OB/OD units and an integrated schedule to address these items.

If you have any questions, please don't hesitate in contacting me at 757-322-4815.

Sincerely,

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

copy to:

PREQB (Mr. Esteban Mujica Cotto, Chairman)  
PREQB (Yarissa Martinez)  
COMNAVSTA Roosevelt Roads (CDR J.T. Borowy)  
COMNAVSTA Roosevelt Roads (Ms. Madeline Rivera)  
LANTNAVFACENGCOM (Mr. Byron Brant)  
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