



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

6/12/03-02338

JUN 12 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Christopher T. Penny
Project Coordinator
Installation Restoration Section (South)
Environmental Program Branch
Environmental Division,
Atlantic Division (LANTDIV), Code 182
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Re: Atlantic Fleet Weapons Training Facility (AFWTF), Vieques Island, PR
Final Draft Preliminary Range Assessment Report, Vieques Naval Training
Range; EPA I.D.# PRD980536221

Dear Mr. Penny:

This letter is addressed to you as the Navy's designated Project Coordinator, pursuant to Section IX of the January 2000 RCRA 3008(h) Administrative Order on Consent (the Order).

The United States Environmental Protection Agency (EPA) Region 2 has reviewed the April 2003 *Final Draft Preliminary Range Assessment Report, Vieques Naval Training Range* (the PRA), which was submitted to EPA on May 15, 2003. As part of that review, EPA requested our contractor, TechLaw Inc., to assess the PRA for its completeness and acceptability. EPA's comments are given below and in the enclosed Technical Review prepared by TechLaw.

One of the main technical deficiencies identified with the PRA are the data gaps that exist pertaining to the type, amount, and location of munitions fired at the range through the 1940s to the 1970s. No discussion is provided in the document to detail this information. While these data gaps do not invalidate the conclusions and recommendations contained in the report, a discussion of site activities during this time period is important, in that significant revisions to the conclusions and recommendations may be necessary based on the additional information.

In addition, the report provides no indication that the water areas contiguous to the terrestrial range areas are being assessed, despite the fact that these areas very likely contain extensive unexploded ordnance (UXO). This fact should be noted in the report, and the significance of excluding potentially impacted [with UXO] water areas should be thoroughly discussed.

Based on the extensive general and specific comments on the PRA, EPA recommends that the Draft PRA be revised to address all comments given in the enclosed Technical Review.

Also, EPA strongly recommends that the Draft PRA promptly be made available for public review, and that copies promptly be placed in all public repositories designated under the AFWTF Community Relations Work Plan.

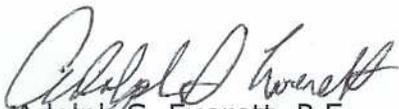
Within 21 days of your receipt of this letter, please confirm in writing that you will revise the Draft PRA to address comments given in the enclosed Technical Review, and indicate a schedule for that revision. Also, please confirm that the Draft PRA will be made available for public review, including promptly placing copies of the Draft PRA in all public repositories.

In addition, the lack of information in the PRA regarding munitions related activities from the 1940's to the 1970's may be relevant to the April 2003 Draft Red and Blue Beaches MEC [munitions and explosives of concern] Investigation Report, which was previously submitted to EPA. As you know, the April 2003 Draft Red and Blue Beach report is to be revised to reflect the additional MEC investigation work implemented from April 26 through April 30, 2003. The revised Red and Blue Beach Report should also address the significance of this lack of information regarding munitions related activities from the 1940's to the 1970's, as regards the investigations implemented at those two beaches.

Please note that EPA also plans to submit comments on the April 1, 2003 Draft Final *Environmental Baseline Survey* (EBS) [which was also submitted to EPA on May 15, 2003]; however, our review of the EBS will not be completed until approximately July 3, 2003.

If you have questions regarding the above, please telephone Mr. Tim Gordon, EPA's Designated Project Coordinator for the Order, at (212) 637- 4167.

Sincerely,



Adolph S. Everett, P.E.

Chief
RCRA Programs Branch

Enclosure

cc: Sam D. Hamilton, U.S. Department of the Interior, Fish & Wildlife Service
w/o encl.
Bud Oliveira, U.S. Department of the Interior, Fish & Wildlife Service w/encl.
Mr. Esteban Mujica Cotto, Chairman, PREQB w/o encl.
Yarissa Martinez, PREQB w/encl.
Capt. John R. Warnecke, Naval Station Roosevelt Roads w/encl.
Mr. John Tomik, CH2MHILL w/encl.