



10/12/05-02451

DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
ATLANTIC
6506 HAMPTON BLVD
NORFOLK VA 23508-1278

TELEPHONE NO:

IN REPLY REFER TO:

October 12, 2005

Mr. Daniel Rodriguez
Remedial Program Manager
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency
Vieques Office Park
Carr. 200, Km 0.4
Vieques, PR 00765-1537

Re: *Initiation of Rock Removal from AOC F (Rock Quarry) for Road Repair, Vieques, Puerto Rico*

Dear Mr. Rodriguez:

In a letter dated January 19, 2005, from the United States Environmental Protection Agency (EPA) provided conditional approval of the Navy's operational plan for removal of rock material from AOC F to be used as roadbed materials during road repair on the former Vieques Naval Training Range (VNTR). Conditional approval was based on incorporation of minor revisions to the *Final Operational Plan for Removal of Rock Material from AOC F, the Former Rock Quarry* (CH2M HILL, January 12, 2005). Those revisions were incorporated, and the revised plan submitted to EPA as the *Operational Plan for Removal of Rock Material from AOC F to be Used as Roadbed Materials* (NAVFAC/CH2M HILL, February 4, 2005), hereafter referred to as the Plan.

The Plan cites the use of approximately 4,200 cubic yards of quarry material to fill washed out road sections to make them passable, in support of ongoing munitions response and environmental restoration activities. The Plan further states that the results of a Toxicity Characteristic Leaching Procedure (TCLP) inorganics analysis of a composite sample collected in December 2004 will be presented to EPA, the Puerto Rico Environmental Quality Board (PREQB), and the US Fish and Wildlife Service (USFWS) prior to initiating the rock removal activities. In addition, the quarried material will be visually screened for the presence of munitions, cultural artifacts, and potential environmental contamination, as well as sampled for off-site laboratory analysis of TCLP inorganics at a rate of 1 sample per 100 cubic yards of material removed.

Since EPA's approval of the Plan, you have verbally requested at the CERCLA Technical Committee meetings that analyses of total metals, from the list of RCRA metals, be added to the list of constituents to be analyzed from the samples that are collected at a rate of 1 sample per 100 cubic yards of material removed. It should be noted that the Navy does not consider it necessary to analyze samples of the quarried material because it is a raw material and there is no evidence that it is associated with historical disposal of hazardous waste. However, the Navy will conduct these analyses in order to continue with the ongoing munitions response and environmental restoration activities.

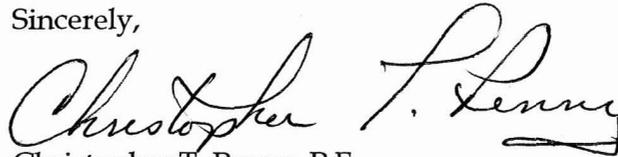
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Based on EPA's conditional approval and the additional actions identified in this letter, the Navy will pursue with the USFWS the rock removal activities documented in the Plan and this letter, unless EPA retracts the approval in writing within the next 30 days.

Should you have any questions, please do not hesitate to contact me at (757) 322-4815.

Sincerely,



Christopher T. Penny, P.E.
Eastern Vieques Project Coordinator
Environmental Programs Branch (Caribbean Section)
Environmental Division
By direction of the Commander

cc: USEPA (Messrs. Carl Soderberg, Jose Font, Tim Gordon, Adolph Everett)
PREQB (Sra. Yarissa Martinez)
DOI (Ms. Susan Silander, Messrs. Oscar Diaz and Bud Oliveira)
NAVFAC Atlantic (Messrs. Byron Brant and Jeffrey Harlow)
CH2M HILL (Messrs. John Tomik and Brett Doerr)