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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
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April 29, 2005

Mr. Christopher T. Penny
Remedial Project Manager
Installation Restoration Section (South)
Environmental Program Branch
Environmental Division,
Atlantic Division (LANTDIV), Code 182
Naval Facilities Engineering Command
6506 Hampton Blvd.
Norfolk, VA 23508-1278

Dear Mr. Penny:

On April 7, 2005, the United States Environmental Protection Agency (EPA) and the Puerto Rico Environmental Quality Board (EQB) conducted a public meeting to discuss the Resource Conservation and Recovery Act (RCRA) 90-day emergency permit to detonate recovered unexploded ordnance on the Island of Vieques issued to the U.S. Navy on February 4, 2005. During the meeting, Vieques residents expressed concerns about the potential contamination and/or air releases of contaminants that may have been generated from the blow-in-place (BIP) activities that the Navy conducted in connection with the implementation of the Expanded Range Assessment / Site Inspection (ERA/SI) work plan for eastern Vieques.

As you are aware, EPA, as well as EQB, recommended measures that could be used to minimize the release of contaminants that could result from a BIP. Some of these are:

- perform single shots or small consolidated shots. The rationale is that the bigger the shot, the more likely it will be incomplete, and the more donor charge is needed;
- use donor charges that are relatively low in terms of potential for toxic residues; and
- establish an air monitoring program. Although air monitoring is not a measure that will result in a reduction of potential air emissions from BIP and open detonation (OD), it was well received by the community as a mechanism for addressing their concerns about potential air emissions that could impact their health.

It is our understanding that DOD has taken similar measurements at other facilities (e.g., Fort ORD, California) when BIP and OD activities were conducted. Given the projected

aggressive field work schedule (i.e., Time Critical Removal Action), it is essential that the Navy address the recommendations contained in this letter at the earliest possible time.

These measures were discussed with Navy representatives at the Munitions Response (MR) Subcommittee meeting on April 20, 2005. At the meeting, you indicated that the Navy was not willing to perform the air monitoring. You presented, however, the option of having EQB use its contractor to develop and implement the air monitoring program with assistance from the Navy through the Cooperative Agreement under the Department of Defense and state Memorandum of Agreement (DSMOA).

In the spirit of addressing this legitimate concern raised by the Vieques community, which EPA recognizes and supports, we are requesting that the Navy implement or assist in the implementation of an air monitoring program to assess any potential contamination that could result from the projected BIP and OD operations in Vieques. This air monitoring program should characterize contaminants released from the site, measure contaminant concentrations and collect enough information to assess the potential for airborne contaminants to reach receptors.

EPA is committed to actively working with residents, elected officials, community groups, and other interested individuals in a transparent process as the work on Vieques proceeds. We feel it is imperative to establish a strong Community Involvement Plan (CIP) that sets forth policies for working with the public, similar to EPA's draft RCRA CIP. Optimally, this CIP would be a joint document of the Navy and EPA. Based on the telephone conference call with your staff held on April 28, 2005, it seems that the Navy is interested in establishing a joint document as well. As our two agencies discuss this further, we encourage the Navy to augment its community involvement activities with public notices, coordination with elected officials, direct communication with stakeholder groups, and outreach to the media. The more we engage the community, the more productive we will be as we complete our work on Vieques.

We will appreciate your efforts to address community concerns about air emissions and public involvement, and we look forward to your continued cooperation throughout the Vieques cleanup efforts. Should you need any additional information, please call Mr. Daniel Rodríguez of my staff at (787) 741-5201.

Sincerely,



Carl-Axel P. Soderberg, P.E.

Director

Caribbean Environmental Protection Division

cc: Carlos W. Lopez Freytes, Esq., Chairman EQB
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