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JUL 09 2004

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

Subject: Draft Work Plan For Expanded Range Assessment/Phase
I Site Inspection (ERA/SI) for the Former Vieques
Naval Training Range (VNTR)

Dear Mr. Mugdan;

This letter is in response to your letter of May 3, 2004. Pursuant to meeting the protocols of both CERCLA and Section 3008(h) of RCRA, the enclosed *Draft Final Work Plan for the Expanded Range Assessment/Phase I Site Inspection for the Former Vieques Naval Training Range* is submitted for the Environmental Protection Agency's (EPA) review and comment. In addition, the above referenced work plan has been forwarded to other core governmental agencies involved in the Military Munitions Response Program for Vieques (i.e. Department of Interior (DOI), Puerto Rico Environmental Quality Board (EQB), Naval Ordnance Safety and Security Activity (NOSSA) and EPA Headquarters) for their concurrent review. The Draft Final Work Plan addresses the comments that the Navy received from the working munitions response sub-committee (Navy, EQB, DOI, and EPA) on June 16, 2004, regarding the Draft Work Plan that was submitted to EPA, EQB, and DOI during the CERCLA Technical Committee Meeting held in San Juan, Puerto Rico on June 3, 2004.

This work plan has been prepared in accordance with Department of Defense (DOD) requirements to conduct munitions responses under CERCLA (42 U.S.C 9601, Executive Order 12580). This scope of the work is considered as the initial phase of a multi-phased approach for the identification and assessment of explosive hazards associated with each of the Munitions Response Areas (MRA's) across the surface lands of the Former Vieques Naval Training Range. Site identification and knowledge of the

July 9, 2004

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explosives hazards specific to the identified site are essential elements in regards to assessing the explosives safety aspect of follow on munitions response actions (i.e. site inspections, remedial investigations, and interim removal actions). In addition, the results of the site inspection will assist in providing the necessary data elements for prioritizing the individual Munitions Response Sites (MRS's) within each MRA for subsequent munitions response actions. Prioritization of MRS's for subsequent munitions response actions will follow the provisions set forth in the Department of Defense's Proposed Rule for Munitions Response Site Prioritization Protocol (32 CFR Part 179).

Since this document has received preliminary reviews from the working munitions response sub-committee and revised accordingly, the Navy requests an expedited review by your agency so that the Navy can commence this phase of assessments and specific site inspections by September 2004.

Please be advised that the Navy also intends to submit a public notice in the local newspaper advising the community of the public availability of this draft document on or about July 30, 2004. If you have any questions, please don't hesitate in contacting me at 757-322-4770 or Christopher T. Penny of my staff at 757-322-4815.

Sincerely,



PAUL RAKOWSKI, P.E.

Head

Environmental Programs Branch

Environmental Services

By direction of the Commander

Copy to:

PREQB (Mr. Esteban Mujica Cotto, Chairman, Ms. Yarissa Martinez)

GEOPHEX (Mr. Jim Pastorik)

ASN (I&E) (Mr. Paul Yaroschak)

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CNO N45 (Mr. Dave Olson)

LANTNAVFACENGCOM (Messrs. Paul Rakowski, Byron Brant)

EPA RCRA Branch (Messrs. Adolf Evertt, Tim Gordon)

EPA Federal Facilities (Ms. Helen Shannon)

EPA Headquarters Caribbean Office (Messrs. Daniel Rodriguez,
Carl Soderberg)

DOI (Messrs. Bud Olivera, Cal Garnet, Oscar Diaz, Felix
Lopez)

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