



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board

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Environmental Emergencies Response Area

June 23, 2010

Mr. Kevin Cloe, P.E.
Remedial Project Manager
Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Boulevard
Norfolk, VA 23508-1278

**RE: DRAFT NO ACTION/NO FUTURE ACTION DECISION
DOCUMENT, 7 CONSENT ORDER SITES AND 14 PI/PAOC SITES,
FORMER VIEQUES NAVAL TRAINING RANGE, VIEQUES, PUERTO
RICO**

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has completed its review of the Navy's Draft No Action/No Further Action Decision Document, 7 Consent Order Sites and 14 PI/PAOC Sites, Former Vieques Naval Training Range, Vieques, Puerto Rico, dated June 2010. Our comments are provided in the attachment.

Please contact me at (787) 767-8181 X.6129 if you have any questions or comments about our review.

Cordially,

Wilmarie Rivera
Federal Facilities Coordinator

cc: Daniel Rodríguez - EPA
Richard Henry - FWS
Brett Doerr - CH2M Hill
Daniel Hood - Navy
Christopher Penny - Navy
John Tomik - CH2M Hill

PREQB Technical Evaluation of Draft No Action/No Further Action Decision Document, 7 Consent Order Sites and 14 PI/PAOC Sites, Former Vieques Naval Training Range, Vieques, Puerto Rico, June 2010

I. PAGE-SPECIFIC COMMENTS

1. Table ES-1, Rationale for No Action/ No Further Action Determination.

- a. SWMU 4. Please clarify the following text “Data suggest there has not been a CERCLA-related release or, if a release occurred, it has not resulted in soil or groundwater contamination at concentrations that would pose a potentially unacceptable risk to human or ecological receptors or leaching concern for groundwater...” Please consider revising this statement, as it appears that it is not known whether a release occurred or not. Note that this text occurs elsewhere in Table ES-1 and in the individual sections that present the information on each site. Please consider revising the text of the document to be more definitive as to whether a release occurred or not. For SWMU 4, the text of Section 3 states “...there has not been a CERCLA-related release at SWMU 4 that has resulted in contamination of soil at concentrations that would pose a potentially unacceptable risk to human or ecological receptors or leaching concern for groundwater...” Please consider using this text in this section of the table.
- b. PAOC P. Please revise the text to indicate that removal of the mobile generator eliminates potential future sources of contamination and the data collected from beneath the generator indicated no past releases occurred. Currently the text states that “mobile generator removal has eliminated *past* and potential future source[s] of contamination...”
- c. PAOC X. Please revise the text to indicate that removal of the debris eliminates potential future sources of contamination and that the soil confirmation data indicates no past releases occurred. Currently the text states that “debris removal has eliminated *past* and potential future source[s] of contamination...”

MINOR EDITORIAL COMMENTS

1. Table ES-1.

- a. PAOC J. Typographical error – change “Spolls” to “Spills” in “Potential Release Mechanism(s)” column.
- b. PAOC K. Typographical Error – change “Vehicl” to “Vehicle” in “Site History” column.