



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: TECHNICAL EVALUATION SWMU 1 HUMAN HEALTH RISK
ASSESSMENT PRE-INTERIM DELIVERABLE, FORMER VIEQUES
NAVAL TRAINING RANGE, PUERTO RICO**

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has completed its review of the SWMU 1 Human Health Risk Assessment Pre-Interim Deliverable, Former Vieques Naval Training Range, Vieques, Puerto Rico. 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 the SWMU 1 Pre-Interim Deliverable
Former Vieques Naval Training Range, Puerto Rico**

1. The data provided in the Analytical Data Attachment file includes landfill cover soil and ephemeral stream surface soil data. It appears that these two datasets are combined for the purposes of the human health risk assessment. One of the options discussed for the feasibility study is evaluating whether the current cover material is acceptable as the final remedy. In order to provide information concerning the risks associated with the landfill cover, please consider separating the data into two datasets, one comprised of landfill cover soil data and one comprised of ephemeral stream soil data.
2. RAGS Table 2 and Table 3. These tables indicate that the exposure medium is surface soil from 0-2 feet below ground surface (bgs), yet all samples represent soil from 0-1 foot with the exception of one ephemeral stream sample at sample location SO-27 collected from 0-2 feet bgs at the stream delta to account for land crabs. Please revise these tables to reflect the actual sample depth of all but one sample, and address the inclusion of the ephemeral stream sample data in the landfill cover dataset, as commented on in Comment 1 above.