



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board

Environmental Emergencies Response Area

August 18, 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 Review of the Interim Deliverable for the Human Health Risk Assessment – RAGS Part D Tables- SWMU 1, Former Vieques Naval Training Range, Vieques, Puerto Rico

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has completed its review of the Interim Deliverable for the Human Health Risk Assessment – RAGS Part D Tables- SWMU 1, Former Vieques Naval Training Range, Vieques, Puerto Rico. Enclosed our comments.

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
Daniel Hood - Navy
Christopher Penny – Navy
Brett Doerr – CH2MHILL

PREQB Technical Review
Interim Deliverable for the Human Health Risk Assessment – RAGS Part D Tables –
SWMU-1, Former Vieques Naval Training Range, Vieques, Puerto Rico

1. Page 1, Section 2, Potential Receptors: Due to the present of landfill materials, it is reasonable to assume exposure only to the cover material as a land use control will restrict access to landfill materials below the landfill cover. However, it is unclear that this land use restriction will apply to areas outside of the landfill boundary. For the human health risk assessment (HHRA) report, please verify that the land use restriction will be placed across all of SWMU 1, rather than just on the landfill, and verify that workers will not conduct any intrusive activities in the future outside the landfill boundary at SWMU 1. This comment applies to Note 4 on Figure 1 also.
2. Table 4, Supplement A: It is unclear that the default vegetative cover value of 0.5 is applicable to this site, where land use restrictions will prohibit future activities that would result in removal of vegetation. A vegetative cover of 1.0 would be more applicable to this site. Please address.
3. Table 5: Please clarify why dermal reference doses are calculated for chemicals that footnote 1 on Table 4, Supplement B, indicates will not assess for dermal exposure.
4. Figure 1:
 - a. Note that Figure 1 indicates that subsurface soil only refers to municipal landfill waste; however, subsurface soil is present outside of the landfill boundary but within the area investigated as SWMU 1. Please clarify in the report why subsurface soil outside the landfill boundary was not sampled and not evaluated in the HHRA. Please revise this table and the text as applicable for use in the HHRA report.
 - b. Note 4 – Please see Comment 1 above.