



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board



ENVIRONMENTAL EMERGENCIES RESPONSE AREA

November 12, 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 Draft Final Sampling and Analysis Plan, Eastern Conservation Area, Former Vieques Naval Training Range, Vieques, Puerto Rico

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has conducted a technical review of the Draft Final Sampling and Analysis Plan, Eastern Conservation Area, Former Vieques Naval Training Range (VNTR), Vieques, Puerto Rico, received on October 29, 2010. Our comments are provided in the attachment.

If you have any questions or comments, please contact me at (787) 767-8181 x. 6129.

Cordially,

Wilmarie Rivera
Federal Facilities Coordinator

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

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Technical Review of the Draft Final Sampling and Analysis Plan, Eastern Conservation Area, Former Vieques Naval Training Range, Vieques, Puerto Rico

The draft final version of the Sampling and Analysis Plan for the Eastern Conservation Area incorporates the changes as agreed upon, with the exception of the following:

1. PREQB Comment #2: Worksheet #4: The Vieques field auditor Stephen Brand was added to the worksheet. However, the Navy changed the Field Team Leader from TBD to Stephen Brand. It is unclear how the Field Team Leader can provide an objective field audit. Field audits need to be performed by someone independent from the field team. Please clarify.
2. PREQB Comment #4: Worksheet #9a: The response to the comment was acceptable. However, the worksheet shows that the meeting took place on January 26, 2010 (the day before the site visit) and not January 28, 2010, as indicated in the response to the comment. Please clarify.
3. PREQB Comment #11.a.ii: Worksheet # 19: The holding time for pH analysis of solid samples is still 28 days. The response to the comment indicated this would be changed to "as soon as possible."

Minor Edits/Typographical Errors:

1. Table 15-2, Reference Limits and Evaluation Table, Nitrobenzene: This value was changed to 2,400,000 ug/kg for the adjusted industrial RSL. However, the May version of the RSL table indicates that the industrial RSL is 24 mg/kg, which converts to 2,400 ug/kg. Please verify.