



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board



ENVIRONMENTAL EMERGENCIES RESPONSE AREA

March 10, 2011

Mr. Daniel Hood
Remedial Project Manager
Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Boulevard
Norfolk, VA 23508-1278

RE: Technical Review Draft Engineering Evaluation/Cost Analysis for Surface MEC Removal from the Munitions Response Site UXO-13, Former Vieques Naval Training Range

Dear Mr. Hood:

The Puerto Rico Environmental Quality Board (PREQB) has conducted a technical review of the Draft Engineering Evaluation/Cost Analysis for Surface MEC Removal from the Munitions Response Site UXO 13, Former Vieques Naval Training Range (VNTR), Vieques, Puerto Rico, dated February 2011. 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 Rodriguez - EPA
Richard Henry - FWS
Kevin Cloc- Navy
John Tomick - CH2MHILL

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**Technical Review of the Draft Engineering Evaluation/Cost Analysis
for Surface MEC Removal from the Munitions Response Site UXO 13, Former
Vieques Naval Training Range, Vieques, Puerto Rico,
Dated February 2011**

GENERAL COMMENTS

1. Please consider including in the title “Interim Remedial Action” as this will clearly identify the intent of this document.

2. PREQB concurs with the conclusion and recommendation of the document (selection of Alternative 3: surface removal of MEC). For clarity and to support the decision-making process, please ensure that Sections 4 and 5 and Table 4-2 are consistent in that all the individual criteria presented on the table are addressed and any new criteria presented in the sections are included on the table. For example:
 - Section 4.3.2, “protection of workers during implementation” is not identified in Table 4-2 as an evaluation criterion.
 - The sub-criteria for “implementability” and “cost” are not individually addressed.
 - The bullets in Section 5.1 showing the sub-criteria for “effectiveness” are different than the sub-criteria presented in Table 4-2. For example, “protection of workers during implementation” is included and “long-term effectiveness and “short-term effectiveness” are not included. The sub-criteria for “implementability” in Section 5.2 are also different from those presented in Table 4-2.
 - Worker protection is again discussed in Section 5.1 on lines 19 and 20 while that isn’t identified in Table 4-2 as an evaluation criterion.
 - Section 5.1, Lines 23 and 24 discusses “public health and safety” for Alternative 2 when the evaluation criterion requires evaluation of the “protection of human health and the environment”. Using terminology that is consistent with the guidance and Table 4-2 is recommended.
 - The sub-criteria for “Implementability” in Section 5.2 are different than the sub-criteria in Table 4-2.

PAGE-SPECIFIC COMMENTS

1. Page 5-2, Section 5.2, Lines 17 and 18 say, “Evaluation of implementability is essentially the evaluation of technical and administrative feasibility.” However according to Table 4-2 the evaluation of implementability is the evaluation of technical feasibility, administrative feasibility, availability of services and materials, and state and community acceptance. Please revise the text to reflect all the criteria used to evaluate implementability.

2. Page 4-5, Section 4.3.2, Alternative 3: This section says, “Only authorized personnel will be allowed in the exclusion zone”. As agreed upon by the Navy, “authorized visitors” are allowed under specific conditions to enter the EZ. Please revise the text accordingly.
3. Page 4-5, Section 4.3.3: Please evaluate the three alternatives for compliance with ARARs in this section.
4. Page 4-4, Section 4.3.4: An additional benefit for Alternative 3 for Short-term Effectiveness is that the insertion of UXO workers into the area will serve to identify and discourage trespassing immediately, thereby reducing the exposure of trespassers to the MEC hazard. Please mention this in this section to add support to Alternative 3 for Short-term Effectiveness.
5. Page 4-6, Section 4.3.5: Please address the following issues in the evaluation of Alternative 3 for Long-term Effectiveness:
 - a. Line 2 says that Alternative 3 will remove “on-site MEC”. It would be more accurate to say “surface MEC”.
 - b. Please identify positive effects of Alternative 3 in this evaluation. For example, while MEC in the subsurface may be exposed through erosion, experience on Vieques and other similar MR sites shows that the majority of MEC is located at least partially on the surface and will be removed under Alternative 3. Also, removal of the surface MEC will result in a significant reduction in the MEC hazard in UXO-13.
6. Page 4-6, Section 4.4.2, Lines 19 – 22: Please clarify why this paragraph discusses reduction of MEC risk and USFWS access to the site as it appears that these topics are not part of the evaluation for “implementability”.
7. Page 4-7, Section 4.5.2, Line 21 identifies an evaluation of O&M costs for Alternative 2 for five years. Please clarify why the cost of fencing and signage is only being evaluated for five years.
8. Table 5-1: Minor editorial comment – This table defines “VNTR” in the notes although “VNTR” is not used in the table.
9. Section 6, first paragraph: Please revise this section for consistency with Table 4-2. For example, the evaluation of “effectiveness” needs to be an evaluation of all five of the sub-criteria identified in Table 4-2. Please consider modifying this introductory paragraph to state that all of the sub-criteria were evaluated.
10. Section 6, Line 11 refers to Alternative 3 as a “more permanent overall remedy for the site”. Please consider revising the text to indicate that this remedy is more consistent with the anticipated overall remedy for the site.

11. Section 6, Line 16: Please consider adding text such as, "... and the RAO will not be fully achieved through implementation of this interim remedial action" to the end of the first bullet (line 16).