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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
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March 23, 2011

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

Re: Review of the Draft Site Inspection/Expanded Site Inspection Report Addendum, PI 7, PAOC Q, and PAOC R, Former Vieques Naval Training Range, Vieques, Puerto Rico

Dear Mr. Cloe:

The U.S. Environmental Protection Agency (EPA) completed the review of the Draft Site Inspection/Expanded Site Inspection Report Addendum, PI 7, PAOC Q, and PAOC R, Former Vieques Naval Training Range, Vieques, Puerto Rico, dated January 2011. Enclosed you will find our comments.

If you have any questions or comments, please contact me at (787) 741-5201.

Sincerely,

Daniel Rodríguez
Remedial Project Manager
Response and Remediation Branch

Enclosure

cc: Wilmarie Rivera, EQB, w/ encl.
Richard Henry, FWS, w/encl.
Brett Doerr, CH2M Hill, w/ encl.

EPA REVIEW OF THE DRAFT SITE INSPECTION/EXPANDED SITE INSPECTION REPORT ADDENDUM PI 7, PAOC Q, AND PAOC R FORMER VIEQUES NAVAL TRAINING RANGE VIEQUES, PUERTO RICO JANUARY 2011

Presented below are comments resulting from the review of the Draft Site Inspection/Expanded Site Inspection Report Addendum PI 7, PAOC Q, and PAOC R, Former Vieques Naval Training Range, Vieques, Puerto Rico.

1. Figure ES-1 and Figure 1-1: These figures imply that areas such as Isabel Segunda are within the Former Vieques Naval Training Range. Please correct.

2. Section 3.3, PI 7 Release Assessment Decision Analysis, Step 6: *Can more realistic evaluations of the data be performed, and if so, do they suggest contaminant levels warrant no further investigation or action?* *Ecological Evaluation*, page 3-9: The arithmetic mean concentrations of selenium should be discussed and compared to the ecological soil screening value. There should be some discussion regarding the range of non-detect values which appear to be greater than the screening value, and result in a mean concentration greater than the maximum concentration detected.

3. Table 3-1, Surface Soil Detection and Exceedance Results: Please clarify that the screening level for chromium is for hexavalent chromium and add the appropriate footnote.

4. Figure 3-1, PI 7 Central Subsection – Former Quarry: It would be useful to include the sampling dates in the legend.

5. Table 3-3, HHRA COPC Summary Table:

    a. The detection frequency for surface soil and subsurface soil is confusing. Surface soil should represent samples collected from 0 - 2 feet, while subsurface soils are 0 - 6 feet. Therefore, the subsurface data set should include all data from the surface soil data set. Please explain why the surface soil dataset is larger than the subsurface soil dataset.

    b. Please clarify if the calculations for surface soil for the resident include ADAF adjustments for PAHs, which act through a MMOA. If not, these should be revised to include the appropriate age adjustment factors.

6. Table 4-3, HHRA COPC Summary Table: Please correct the errors in the "frequency of criteria exceedance" column. For example, the frequency of exceedance for vanadium is 8 out of 2.

7. Tables 5-3, HHRA COPC Summary Table, and 5-4, HHRA COPC Summary Table Supplement: Since the total HI value exceeds 1.0, please provide a breakout table of HI values based on target organ.