

279



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CENTRO EUROPA BUILDING, SUITE 417
1492 PONCE DE LEON AVENUE, STOP 22
SAN JUAN, PR 00907-4127

May 31, 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 Proposed Plan Solid Waste Management Unit (SWMU) 1,
Former Vieques Naval Training Range, Vieques, Puerto Rico

Dear Mr. Cloe:

The U.S. Environmental Protection Agency (EPA) completed the reviews of the Draft Proposed Plan Solid Waste Management Unit (SWMU) 1, Former Vieques Naval Training Range, Vieques, Puerto Rico, dated March 2011. Enclosed you will find our comments.

In addition to the comments enclosed herein, EPA would like to discuss the role of land use controls (LUCs) and their implementation on the site overall, especially with respect to groundwater and access. To ensure the successful development of a LUC strategy, EPA recommend that these discussions also include the Puerto Rico Environmental Quality Board and the U.S. Department of Interior.

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.
Julio Vazquez, EPA-ERRD, w/ encl.

Draft Proposed Plan Solid Waste Management Unit 1
Former Vieques Naval Training Range, Vieques, Puerto Rico
March 2011

Presented below are EPA comments on the *Draft Proposed Plan Solid Waste Management Unit (SWMU) 1, Former Vieques Naval Training Range, Vieques, Puerto Rico*, dated March 2011.

General Comments:

1. The draft Proposed Plan does not present risk estimates for any use of groundwater (including potable), relying instead on implementation of Land Use Controls (LUCs) as part of the remedy to prevent its use. A general description of what these LUCs would entail should be included in the Proposed Plan. Also, the appropriate agencies need to have a discussion on what LUC are required and whether or not they are implementable as well as determine who would be responsible for their implementation and any ongoing monitoring or maintenance.
2. The document throughout indicates that the SWMU 1 landfill only contains municipal trash and debris -- yet, on page 6, it states that munitions-related items were also observed. Ammunition and small arm cartridges are not normal municipal trash. In addition, the data on page 7 for some pesticides and particularly for copper (23,400 ppm) are not characteristic of municipal trash, but rather hazardous substances. The wording tends to underestimate the hazards and could be misleading to the public.
3. The titles for all of the tables are in small type at the bottom of each table these should be moved to the top of the page and made larger to make the document more reader friendly.

Specific Comments:

1. **Section 2.1, Facility Description and History, page 2:** Nowhere in this document is the site referred to by the name it is known on the National Priorities List "Atlantic Fleet Weapons Training Area -Vieques." Recommend amending the sentence that currently reads "On February 11, 2005, Vieques ... " to read "On February 11, 2005, the Atlantic Fleet Weapons Training Area - Vieques (also known as AFWTA-Vieques) was added to the National Priorities List ..."
2. **Section 2.2, Site Description, page 2:** It might be helpful to discuss the ephemeral stream in this section. Describing the physical components of the site early in the report may help the reader understand the rest of the document more clearly. Please add this information to Section 2.2.
3. **Section 2.3, Summary of Previous Investigations, Streamlined Remedial Investigation/Feasibility Study (2011), page 6:** The wording in the second complete sentence of the first paragraph notes that "there were no unacceptable risk to human health or the environment posed by contaminant levels identified at the site *under current and planned*

future land use scenarios.” The italicized words are misleading as ecological risk assessment considers the current exposure only, and does not consider or evaluate future land use scenarios. It is recommended that the discussion of ecological risk be removed from this sentence and a second sentence be added that indicates that “No unacceptable risks to the environment were identified at this Site.”

4. **Section 2.3, Summary of Previous Investigations, Streamlined Remedial Investigation/Feasibility Study (2011), page 6:** Left Column, Second Paragraph: Please clarify in the text that EPA's presumptive remedy guidance is for municipal landfills. As written, the text suggests the guidance applies to all types of landfills.
5. **Section 2.3, Summary of Previous Investigations, Streamlined Remedial Investigation/Feasibility Study (2011), page 6:** This paragraph refers generically to EPA's guidance on presumptive remedies for landfills. This section should discuss OSWER Directive 9355.0-67FS “Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills” and why it is appropriate for SWMU1. Then in Section 3.2, Nature and Extent of Contamination, the PRAP should provide a description of how the material found is similar to that found in municipal landfills.

Also, since the Navy is citing the Presumptive Remedy strategy a discussion of how the proposed remedy is meeting the components of the Containment Presumptive Remedy is appropriate. These components include: cap, source area groundwater control, leachate collection treatment, landfill gas collection and treatment and ICs to supplement ECs. For example, if a leachate collection system and landfill gas collection system are not necessary then a statement to that effect with a brief description of the rationale would be appropriate.

In addition, the Administrative Record will need to contain the following documents to support the use of the presumptive remedy (in addition to the site specific documents developed for SWMU1):

1. Presumptive Remedy: Policy and Procedures
 2. Presumptive Remedy for CERCLA Municipal Landfill Sites
 3. Application of the Municipal Landfill Presumptive Remedy to Military Landfills
 4. Feasibility Study Analysis for CERCLA Municipal Landfill Sites
6. **Section 3.1, Physical Characteristics, page 6:** Is the elevation 23 to 3 ft as indicated? If so, it should be written as 3 to 23 ft (lowest to highest).
 7. **Table 1, Soil Exceedance Results, page 9:** Please provide information regarding the site-specific SSL, and note that this value is protective of human health. Further, the table may add confusion regarding risk to ecological receptors, as it appears that there are contaminants identified at concentrations greater than ecological value. However, these potential contaminants are not discussed in Section 4.2 Ecological Risk Assessment. Additional language should be added to Section 4.2 to explain exceedances included in Table 1 and why concentrations of these contaminants were not of ecological concern.

8. **Section 3.2, Nature and Extent of Contamination, page 9:** The second sentence in the first complete paragraph, "Although several inorganic concentrations detected in the ephemeral stream slightly exceed background dataset concentrations, they are likely attributable to background based evaluation of the ephemeral stream dataset as a whole (Table1)" is confusing and inaccurate. As noted in the RI/FS, "Because the ephemeral stream only contains water infrequently, there is no discernable difference in habitat between the ephemeral stream and the surrounding area within the SWMU 1 site boundary. Thus, the surface soil samples from the site and ephemeral stream were combined for this evaluation." Inorganics detected in ephemeral stream samples were compared to surface soil and subsurface soil background data (as appropriate), not data specific to ephemeral streams. Therefore, it is recommended that this sentence be removed.
9. **Section 3.2, Nature and Extent of Contamination, page 9:** Suggest rewording the last sentence to read: Groundwater data collected from beneath, adjacent to and down gradient of the landfill indicate that although some concentrations are above background, they are below EPA MCLs and do not indicate widespread leaching from the landfill has occurred.
10. **Section 3.3, Fate and Transport, page 9:** The last sentence is confusing as written. Suggest rewording: The groundwater monitoring data, as well as the number of years that the waste has been in place (between 30 and 55 years), indicate that the potential for leaching from the landfill is minimal.
11. **Section 6, Remedial Action Objectives, page 12:** As there is exposed debris within the landfill, the RAO should be to prevent direct contact with surface as well as subsurface landfill debris.
12. **Section 6, Remedial Action Objectives, page 12:** The last bullet provides an RAO for ensuring GW use is restricted, and the first paragraph after this bullet states that no RAO for GW is needed "...because there is no groundwater contamination requiring remediation and no evidence that leaching is a concern. However, long-term groundwater monitoring will be conducted to determine if a future release from the landfill occurs that results in groundwater contamination..." Is it appropriate to include a RAO to ensure contamination left onsite at the landfill will not impact groundwater in the future and then identify an action to perform long-term GW monitoring?
13. **Section 7.1, Relative Evaluation of Alternatives, Threshold Criteria, Compliance with ARARs, page 13:** The proposed plan does not discuss ARARs anywhere so it is difficult to determine if the statement "All alternatives except Alternative 1 comply with the ARARs" is factual. Identification of a select number of key ARARs would be beneficial, especially if they impact current/future land use.
14. **Table 4, Remedial Alternatives, page 13:** Alternatives 2 and 3 need to specify that groundwater monitoring is part of each remedy. Please confirm that the cost estimates as shown include this long term groundwater monitoring.

15. **Table 6, Relative Ranking of Remedial Alternatives, page 17:** This table presents the 3 alternatives and ranks each of the 9 criteria for remedy selection, using a scale of 1 - 5, with 5 being the most favorable. Under the criterion of present-worth cost, both the No Action alternative (estimated to be \$95,000) and the Enhanced Soil Cover alternative (priced at \$1,258,000) are ranked "4", while the Additional Soil Cover option at a value of \$6,611,000 is ranked "1". This makes no sense - 2 alternatives with more than an order of magnitude in price difference are ranked equally high, while the third option, at a cost only 5 times the medium-priced alternative, is ranked much lower. Please review.
16. **Section 10, Glossary, page 18:** Define "Land Use Control" in the glossary.