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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

July 20, 2009

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 Management Plan, Fiscal Year 2010, Former Naval Facilities, Vieques, Puerto Rico

Dear Mr. Cloe:

The U.S. Environmental Protection Agency (EPA) completed the review of the Draft Site Management Plan, Fiscal year 2010, Former Naval Facilities, Vieques, Puerto Rico, dated June 2009. Enclosed you will find our comments.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel Rodríguez".

Daniel Rodríguez
Remedial Project Manager
Response and Remediation Branch

Enclosure

cc: Wilmarie Rivera, EQB, w/encl.
Richard Henry, FWS, w/encl.
Daniel Hood, Navy, w/encl.
Christopher Penny, Navy, w/encl.

**EPA Comments on the Draft Site Management Plan
Fiscal Year 2010, Former Naval Facilities
Vieques, Puerto Rico
June 2009**

General Comments:

1. The Federal Facility Agreement, per Section 12.8, Public Participation, requires general public participation be provided for the annual amendments of Site Management Plan (SMP). The Draft SMP does not include discussion on how this requirement will be met. It only shows in Figure 3-2, Vieques Munitions Response Program Schedule, time allocated for RAB review. Please discuss how the Navy plans to provide timely opportunity for general public participation.

Specific Comments:

2. **Section 2.1.1, Environmental Sites, pages 2-2 to 2-7:** For a number of environmental sites, it is stated that the Draft SI/ESI Report is scheduled to be submitted by September 2009. Figure 3-1, Vieques Environmental Restoration Program Schedule, shows the Draft SI/ESI Report being submitted in October 2009. Also, Appendix B-1, Site Screening Areas – Environmental Sites shows the Draft SI/ESI Report is scheduled to be submitted in September 2009. Please correct for consistency.
3. **Section 2.1.2, Photo-identified (PI) and Potential Area of Concern (PAOC) Sites, pages 2-8 to 2-15:** Same as comment # 1 above.
4. **Section 2.1.3, Munitions Response Sites, Live Impact Area, page 2-16:** The last paragraph states that the subsurface removal action was initiated in May 2008. During the last MRP meeting the Navy informed that the subsurface MEC removal on beaches and roads was initiated in May 2009. Please correct.
5. **Section 2.1.3, Munitions Response Sites, Surface Impact Area, page 2-16:** The last sentence on the second paragraph, discusses an amendment to the phase II site inspection work plan to include additional transect evaluations within the EMA. How is that relevant to the SIA discussion? Please clarify.

Also, please update the discussion on the SIA surface MEC removal work plan on the fourth paragraph.

6. **Section 2.1.3, Munitions Response Sites, Eastern Maneuver Area (MRA-EMA), page: 2-17:** The last paragraph needs to be updated to reflect the current status; the Final NTCRA of Subsurface MEC work plan has been approved by regulatory agencies.

7. **Section 2.2.1, West Vieques Sites, Environmental Sites, page 2-18 to 2-21:** For the sites where NTCRAs took place, the discussion indicates that the Draft Construction Completion Report with residual risk assessments will be submitted in December 2009. Figure 3-1, Vieques Environmental Restoration Program Schedule, shows the Draft Construction Completion Report will be submitted to the agencies in February 2010. Also, Appendix A-1, Status of RI/FS Study Sites in Vieques, PR, shows the Draft Construction Completion Report with residual risk assessments to be submitted in December 2009. Please correct for consistency.

8. **Table 3-1, FY10 and Beyond Tentative Schedule:** Please explain the changes on this table from the FY 2009 SMP. For example, Remedial Investigation on the LIA was to start during FY 2010 in the FY 2009 SMP, and now it shows as starting in FY 2011. Why was there a delay in starting the remedial investigation at the former LIA?

Also, MEC SI for the Underwater Assessment is to start in FY 2010. Figure 3-2, Vieques Munitions Response Program Schedules, do not have a line item for underwater assessment for FY 2010. Please modify Figure 3-2 to be consistent with Table 3-1. Also, include underwater MRS discussion in sections 2.2.1 and 2.2.2, and on Appendix B-2.

9. **Appendix A-2, Status of Munitions Remedial Investigation, page 1:** SWMU 4, Inactive OB/Waste Explosive Detonation Range (west Vieques – DOI Property), the Status column needs to be updated to reflect current status.

10. **Appendix B-2, Site Screening Areas – Munitions Response Sites, Vieques, PR:** Please update the discussion on the Status column. The ERA/SI Phase II has been completed and a report is scheduled to be submitted by September 2009.