



COMMONWEALTH OF PUERTO RICO  
Office of the Governor  
**Environmental Quality Board**



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*ENVIRONMENTAL EMERGENCIES RESPONSE AREA*

October 7, 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 Vieques Site Management Plan Section 2.3 - Munitions Response Site Prioritization**

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has conducted a technical review of the Vieques Site Management Plan Section 2.3 - Munitions Response Site Prioritization, received on September 30, 2010. Enclosed our comments.

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

Cordially,

Wilmarie Rivera  
Federal Facilities Coordinator

## **PREQB Technical Review of Vieques Site Management Plan Section 2.3 “Munitions Response Site Prioritization”**

1. There is a typographical error in the sixth line of the second paragraph. “Compromised” should be “Comprised”.
2. This text doesn’t state how the SPP is going to be used on Vieques. For example, will it be strictly followed for sequencing, or, as the SPP allows, will other “risk-plus factors” be considered when sequencing work at the Vieques MRS? The reason for this is that the SPP, as presented, doesn’t appear to offer much benefit for sequencing because almost all MRS received a score of “2”. The reader of this section will logically be asking how the Vieques MRS are going to be sequenced if the SPP doesn’t numerically perform that function. Adding information on this issue is recommended.
3. The beginning of the third paragraph states that the “... HHE module was used for evaluating the potential hazards posed by Munitions Constituents (MC) and other chemical constituents at each MRS. However, for the Vieques MRSs sufficient MC data has only been collected for the SWMU 4 site on west Vieques...” Please clarify if the HHE module was used, as stated, when all UXO scores are 5, and the text states that a medium score was used for all sites due to the lack of environmental data for the MRSs. If the HHE was not used for any of the Vieques MRSs for this initial scoring, please revise the sentences reproduced above.
4. The HHE rating for SWMU 4 is 5, as shown in the Appendix D UXO Scoring file provided. Please clarify if the HHE module was used to generate the HHE rating of 5 for SWMU 4 or whether 5 represents the default “medium” rating used for all MRSs. If this value is the default used for all MRSs, please clarify why the HHE module was not used when MC data are available for SWMU 4.