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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
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November 5, 2010

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 2011, 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 2011, Former Naval Facilities, Vieques, Puerto Rico, dated June 2010. 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.
Daniel Hood, Navy, w/encl.
Brett Doer, CH2M Hill, w/encl.

**EPA Comments on the Draft Site Management Plan
Fiscal Year 2011, Former Naval Facilities
Vieques, Puerto Rico
June 2010**

General Comments:

1. EPA recognizes the Navy's efforts on identifying additional work to accelerate the progress of the clean-up. The additional work identified by the Navy should be included in the current Site Management Plan (SMP), as stated in the specific comments below.
2. Initiating Remedial Investigations (RI) concurrent with the non-time critical removal actions (NTCRA), increasing the number of field teams and/or initiating investigation of underwater unexploded ordnance are some of the efforts that could present alternatives for accelerating the clean-up. The Navy should explore more of these options and update the SMP to reflect these opportunities.
3. The Federal Facility Agreement, per Section 12.8, Public Participation, requires general public participation be provided for the annual amendments of 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:

4. **Section 2.1.3, Munitions Response Sites, Live Impact Area (LIA) page 2-21:** Please revised the third paragraph to reflect the current status (as of June 15, 2010) of the TCRA at the LIA. The paragraph contains outdated information.
5. **Section 2.1.3, Munitions Response Sites, Surface impact Area (SIA), page: 2-22:** Please correct the next to last bullet, it should read: UXO 9, SIA Exterior, instead of LIA Exterior.
6. **Table 3-1, FY10 and Beyond Tentative Schedule, Munitions Response Program:** It will be helpful for Table 3-1, track projections for each of the UXO sites (e.i., UXO-1, UXO-2, etc.) defined by the Navy, instead of the Munitions Response Areas (MRA, e.i., LIA, SIA, EMA) since MRA may contain more than one or more UXO site with different completion dates. Please modify the table to show the projections for each of the UXO sites.

Also, MEC SI for the Underwater Assessment is to start in FY 2010. Figure 3-1, Vieques Munitions Response Program Schedules, do not have a line item for

underwater assessment/investigation for FY 2010. Please modify Figure 3-2 to include the work and the time frame for the underwater MEC investigation. As highlighted in the general comment number 2 above, the investigation of underwater UXO may present an opportunity for accelerating the clean-up process.

7. **Figure 3-1, Vieques Munitions Response and Environmental Restoration Program Schedule:** There has been new development in which the Navy has expressed there is additional work to be initiated during fiscal year 2011. These are PA/SI work at UXO 17 (PI-14, PAOC-EE, and PAOC-FF), and RI work at UXO 12, UXO 13, UXO 14, and UXO 16. Please include these sites with the project schedule in Table 3-1.
8. **Appendix A-2, Status of Remedial Investigation/Feasibility Study Sites in Vieques, Puerto Rico, Munitions Response Sites, page 1:** UXO 3, LIA Roads, appears twice in the table. UXO 2, LIA Beaches, however, is missing. Please correct.
9. **Appendix A-2, Status of Remedial Investigation/Feasibility Study Sites in Vieques, Puerto Rico, Munitions Response Sites, page 1:** Please add to the UXO 4, LIA Interior, status column the acreage where surface removal of MEC could not be completed.
10. **Appendix A-2, Status of Remedial Investigation/Feasibility Study Sites in Vieques, Puerto Rico, Munitions Response Sites, page 5:** Please modify the 2nd to last sentence of the 2nd paragraph and the last paragraph in the status column.
11. **Appendix B-1, Site Screening Areas – Environmental Response Sites, East Vieques, Puerto Rico, page 1:** The last sentence in the status column for SWMU 4 reads that an action is recommended and then it further states that the site will be included in the NA/NFA decision document. Please correct.