



DEPARTMENT OF THE NAVY  
ATLANTIC DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
NORFOLK, VIRGINIA 23511-6287

01.01-10/01/92-0083

TELEPHONE NO:

(804) 445-2993

IN REPLY REFER TO:

5090

1823:JJS:srw

Baker Environmental, Inc.  
Attn: Mr. Thomas Fuller, P.G.  
Airport Office Park, Bldg. 3  
420 Rouser Road  
Coraopolis, PA 15108

Re: Draft SI Forms/PA Scoresheets, Sites 1, 2, and 3  
Vieques Island, U.S. Naval Station, Roosevelt Roads,  
Contract No. N62470-89-D-4814, CTO-0007,  
Modification 0001

Dear Mr. Fuller:

Comments on the PA/SI scoresheets are provided to you in the enclosures. Please revise the scoresheets incorporating these comments and issue the report as draft final. The Navy requests that draft final SI Forms/PA Scoresheets be issued to the Navy no later than October 9, 1992.

Copies of the draft final shall be distributed as indicated in the Contract Task Order, i.e., three copies to LANTNAVFACENGCOM and five copies to Naval Station, Roosevelt Roads.

If you have any questions concerning this matter, please contact Mr. James Szykman at (804) 445-2993.

Sincerely,

L. A. BOUCHER, P.E.

Head

Installation Restoration Section  
(South)

Environmental Programs Branch  
Environmental Quality Division  
By direction of the Commander

Encl:

- (1) LANTNAVFACENGCOM comments on Draft PA/SI scoresheets
- (2) NAVSTA Roosevelt Roads comments on Draft PA/SI scoresheets

SITE INSPECTION REPORT, SITES 1, 2, AND 3 VIEQUES ISLAND  
U.S. NAVAL STATION ROOSEVELT ROADS

<u>Page/Para</u>	<u>Comment</u>
1, Para. 1	The summary should include a brief statement of why the CTO was initiated and the objective of the PA/SI report.
4	Item 14 should list the actual person who prepared the information and the Agency should be listed as Baker Environmental.
5	Under the description of the site it is stated that, "There is no known history of permits pertaining to the site." Were permits required during the period of operations at Vieques.
9	Site 3-IRFNA/MAF-4 should be listed as a spill area rather than a landfill. A one time disposal activity is the action causing concern.
11, Para. 3	Where metals concentrations for filtered or unfiltered, please specify.
11, Para. 4	Change the last sentence to read that "levels were within the ambient water quality criteria, as well as drinking water criteria.
14	Item 8 conflicts with item 9. How does this affect the scoring with respect to groundwater intake? Please explain.
16, Para. 2	This should be eliminated. According to the site summary report from Versar, site 3 and the spring used by the cattle are located on opposite sides of a major drainage divide. Surface water flows away from the spring. The report prepared by Versar, "Site Summary for IRFNA/MAF-4 Disposal Site Vieques Island, (Site No. 3)" February 4, 1991 should be included as a reference.
20	Item 23, MAF-4 and IRFNA are the only waste known to be disposed of at site 3. Why have solvents and paints been listed as possible contaminants. This report should correct any mis-information that has been listed in the past. The answer to item 23 conflicts with item 26.
23	List the Versar report for site 3 as a reference.

PRELIMINARY ASSESSMENT NARRATIVE REPORT, SITES 1, 2, AND 3  
VIEQUES ISLAND, U.S. NAVAL STATION ROOSEVELT ROADS

<u>Page/Para</u>	<u>Comment</u>
2	Section 2.3, Waste Characteristics; This section should contain some additional information of the physical characteristics of the waste, specifically for site 3. MSDS should be available for IRFNA. MAF-4 may be classified, but a similar compound may be used for comparative purposes.
4	Section 4.3, State that there is a groundwater divide at site 3 between the disposal site and the permanent spring.

Encl (1)

## REVIEW COMMENTS ON DRAFT PA/SI FOR SITES 1, 2 & 3

**Reference  
(Page/Paragraph)**

Comments

*Site Inspection*

1

\* This section covers a site summary only and does not include recommendations as the title indicates.

9/2nd

\* Correct; "... IRFNA were emptied into the quebrada, and the drone bodies were disposed of by dropping them into the ocean off deep water ledge." As per reference 2, it should say; "...IRFNA were emptied into the low area and the drone bodies were poured into the low area." *per ref*

20/item no. 24

\* Correct. Population that resides within 4 miles of the site needs to be re-evaluated and corrected. The population to distance relation is most likely:

<u>Distance</u>	<u>Population</u>
>1-2 miles	0
>2-3 miles	~100 {Mil Residents & Transients}
>3-4 miles	0

21/item no. 25

\* Correct; "West Indiana Manatee..."; it should say; "West Indian Manatee..."

\* None of the three sites are turtle habitats. Please correct or clarify.

*Preliminary*

*Assessment*

2

\* The size of Sites 1 & 2 is much smaller than what it has been stated, 5 and 18 acres respectively. Based on the Confirmation Study it suggests that Site 2 may be within an acre. Please re-evaluate the information and correct.

5

\* Section 6.0 provides a summary only. Where are the conclusions?

*PA Scoresheets*

*ENCL (2)*

4

\* Please correct the list of secondary target population served by ground water withdrawn. It is more like:

<u>Distance</u>	<u>Population</u>
>1-2 miles	0
>2-3 miles	~100 {Mil Residents & Transients}
>3-4 miles	0

6

\* Please clarify on section that calls for "Water Body Type/Flow (cfs)". What is it?

7/item no. 9

\* Sites 1 and 3 are not within critical habitats nor wetlands.

7/item no. 10

\* Again, total population to distance relationship on or within is incorrect. Please correct as follows:

<u>Distance</u>	<u>Population</u>
>1-2 miles	0
>2-3 miles	~100 {Mil Residents & Transients}
>3-4 miles	0
Total	100

\* Sensitive environment within 1/2 mile of the site: at a distance from 0 to 1/4 mile encompasses a maximum of approximately 126 acres and not between 200 to 300 acres as stated. Please verify and correct.

\* Additionally, wind blows from southeast which is to the opposite direction from populated areas. Please incorporate comment.

*Waste Characteristics*

1

\* Is the waste characteristic score an average of the three sites or is it the addition? Should we provide individual score for each site?

2

\* What is the criteria used to provide a yes or no answer? What does large, heavy, high, etc. means?

5

\* Need to recalculate the population served to include the revised figures below:

	<u>Distance</u>	<u>Population</u>
	>1-2 miles	0
	>2-3 miles	~100 {Mil Residents & Transients}
7	>3-4 miles	<u>0</u>
	Total	100

8 \* Again, as in comment number 2 above; what is the criteria used?

9 \* The Target Nearby data provided applies to only one site. Please clarify in the document.

\* Primary Fishery Identified: The referenced study area applies to one site only. Please clarify.

10 \* Primary Sensitive Environment Identified: Even though Reference 5 (Draft) shows Site 1 and 3 to be within wetlands, we disagree with the reference because the environment does not meet the requirement of a wetland. Need to further evaluate for wetland characterization.

21 \* Surface Water Pathway Score: Are these characteristics applied to only one site? Please clarify.

\* Air Pathway Secondary Target Populations: Please correct to consider information below:

	<u>Distance</u>	<u>Population</u>
	>1-2 miles	0
	>2-3 miles	~100 {Mil Residents & Transients}
	>3-4 miles	<u>0</u>
	Total	100