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# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Boqueron Field Office  
P.O. Box 491  
Boqueron, Puerto Rico 00622

MAR 24 2006

Chris Penny  
Vieques Remedial Project Manager  
Naval Facilities Engineering Command Atlantic  
Environmental Division  
6506 Hampton Blvd  
Norfolk, VA 23508-1278

Re: Draft Work Plan, Removal Actions  
SWMU 6, SWMU 7, AOC J and AOC R,  
Former Naval Ammunition Support  
Detachment, Vieques, Puerto Rico

Dear Mr. Penny:

This is to comment on the November 2005, draft Work Plan for the removal actions at various sites in Former Naval Ammunition Support Detachment, Vieques, Puerto Rico.

Our office had previously commented on the Engineering Evaluation/Cost Analysis (EE/CA) for these sites. Based on the information provided we have the following comments on the draft work plan:

### **General Comments:**

Estimates of the magnitude of debris piles were included in the EE/CA. The draft Work Plan has interpreted these as exact measurements and this is problematic. For example, Solid Waste Management Unit (SWMU) 6 is now described as a debris pile 165 feet long, 10 feet wide and two feet deep. We recommend that the site dimensions should be the same as those indicated in the RI for the site, also there is no data as to the depth of the waste or the volume since the waste piles were not ever sampled. We recommend that Section 3 of the Work Plan should state that the depth of excavation will depend on the depth of debris requiring removal. We also feel it is premature to assign tonnage of debris to be removed at each site except for conceptual planning purposes.

### **Specific Comments:**

1) Section 3.2.1 Utility Markout: SWMU 6 previously belonged to the Navy and therefore the Fish and Wildlife Service (FWS) has very little information regarding utility lines in the area. Puerto Rico's Sewer and Aqueduct Authority can provide the right-of-way of the freshwater pipeline that supplies potable water for the Municipality.

2) Section 3.2.2 Pre Construction Meeting: FSSI/Shaw should make sure that the FWS Refuge manager and staff are present during any meetings regarding SWMU 6 and Area of Concern (AOC)-J. Puerto Rico's Department of Natural and Environmental Resources may need to be consulted and present during any meetings regarding the ephemeral or intermittent streams in SWMU 7 and AOC-R.

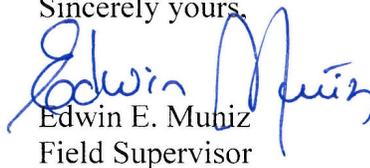
3) Section 3.2.3 Permits: A special use permit may be required by FWS Refuges for work in FWS areas (SWMU 6 and AOC J). Special use permits may be obtained from the FWS Refuge Manager on Vieques.

4) Section 3.3.6 Waste Characterization Sampling: In addition to the analysis listed in Table 3-1, FWS had asked that Organochlorine (OC) pesticides and heavy metals be added to SWMU 6 and AOC J. Some of these are covered in the Toxicity Characteristic Leaching Potential (TCLP) analysis, but OC pesticides such as DDT are left out. We continue to recommend that an OC pesticide scan be included in the waste sampling, the Confirmation Sampling table 3-2 in Section 3.4.3 and in Appendix C the Sampling and Analysis Plan.

5) Appendix B Health and Safety Plan. The plants that constitute biological hazards listed in Section 4.4.3 do not exist in Puerto Rico. Instead this section needs to include several toxic native plants. These are manchineel, castor bean, *Comocladia* and *Croton*. Manchineel (*Hippomane mancinella*) is an evergreen tree found in coastal forest or thickets and can be more toxic than poison ivy or poison sumac. Its sap produces lesions similar to chemical burns. Castor bean (*Ricinus communis*) also has sap that can cause skin lesions and is found in previously disturbed coastal areas. *Comocladia* spp. is a small shrub found in limestone soils such as the eastern part of the Live Impact Area. It has toxic sap and can cause allergic reactions. Another invasive shrub is *Croton discolor*. This small shrub rapidly invades cleared or disturbed areas and can cause respiratory allergies. Photographs of these plants and appropriate first aid should be included in this Work Plan.

Thank you for the opportunity to comment on this project, if you have any questions please contact Felix Lopez of my staff at 787 851-7297 x 226.

Sincerely yours,

  
Edwin E. Muniz  
Field Supervisor

fhl

cc:

EPA, Vieques

EQB, San Juan

USFWS, Vieques