

9/13/07-02790



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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September 13, 2007

Mr. Kevin Cloe
Western Vieques Remedial Project Manager
Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Boulevard
Norfolk, VA 23508-1278

Re: Review of the Draft Proposed Plan Area of Concern H, Former Naval Ammunition Support Detachment, Vieques Island, Puerto Rico

Dear Mr. Cloe:

The U.S. Environmental Protection Agency (EPA) has completed the review of the Draft Proposed Plan for the Area of Concern (AOC) H, Former Power Plant and Fire Training Area, Former Naval Ammunition Support Detachment, Vieques, Puerto Rico, submitted via e-mail by Mr. Brett Doerr, on behalf of the Navy, on August 29, 2007. 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: Josefina González, EQB, w/ encl.
Richard Henry, FWS, w/ encl.
Brett Doerr, CH2M Hill, w/encl.

**EPA Comments Draft Proposed Plan
Area of Concern H Former Naval Ammunition Support Detachment
Vieques, Puerto Rico**

General Comments:

1. Random words are bolded throughout the document. It appears that these are words that are more extensively defined in the glossary, but this is not clearly presented. It is recommended that if bolding identifies words that are defined in the attached glossary, this should be stated at the beginning of the PRAP.

Specific Comments:

2. Section 2.2, Summary of Investigation, Preliminary Assessment/Site Investigation (2000), page 2: At the bottom of the page, there is a discussion of risk and a note to "see Cancer Risk and Non-cancer Hazard in the Glossary." It may make sense to also refer readers to the glossary for the definition of ecological risk assessment.
3. Section 3.1, Site Characteristics, page 4, first paragraph on top left: Perhaps add to the discussion that during the time of sampling, the groundwater was not discharging to the stream, but it may potentially discharge to Vieques Passage to the north. However, the levels of contaminants detected in groundwater did not warrant an investigation to collect additional information regarding groundwater discharge.
4. Section 3.2, Nature and Extent of Contamination, page 4:
 - a. The title of this section is "Nature and Extent of Contamination", the PRAP recommends no action and this section identifies concentrations that exceed risk-based criteria. Although this is explained in the text, this title suggests that contamination exists. EPA suggests revising the title to read, "Findings of the Remedial Investigation" or "Results of the Remedial Investigation".
 - b. The paragraph on surface water states that one SVOC sample was detected, however, in contrast with the other discussions of detections presented in the section, there is no mention if it exceed, or not, a screening criteria or PRG. Please clarify.
 - c. The paragraph on sediment analytical results should discuss the inorganic data, similar to what is provided in Section 5.2, Ecological Risk Survey.
5. Section 3.3, Contaminant Fate and Transport, page 4: In the first paragraph, it is recommended that the phrase, "During rain storms..." be revised to read, "During rain events..."

6. Section 5.1, Human Health Risk Summary, pages 4 and 5:
 - a. In the first paragraph of this section on page 4, please revise the second sentence to include current recreational users. The sentence includes future recreational users, but does not mention that current users have also been evaluated in the BHHRA.
 - b. In the last sentence on page 4, please replace the word "conservative" with "health-protective".
 - c. In the second sentence on page 5, please include the current and future recreational user in the summary.
 - d. In the first sentence in the last paragraph of page 5, please remove the word "land" from "...current or future recreational use scenarios." The text refers to surface water and sediment, so including the word "land" might be confusing.
 - e. It would be helpful for the table number and title that appears at the bottom of page 5 be placed on top of the table so that it could be easily identified in this section.
7. What is human health risk and how is it calculated?, box on right column, page 5: In the text for Step 3, please revise the fourth sentence to read, "In other words, for every 10,000 people that might be exposed under the conditions identified in Step 2, one additional cancer...."
8. Section 5.2, Ecological Risk Survey, pages 6 and 7:
 - a. In the last sentence it is noted that groundwater is not discharging to the ephemeral stream; the word "therefore" should be substituted for the word "regardless"; "Groundwater is not discharging to the ephemeral stream based on water level data and, *therefore*, is not a complete exposure pathway for ecological receptors."
 - b. In the second paragraph, the word "surface" should be inserted before the word "soil." The results of the ERA concluded chemicals detected in *surface* soil . . .
 - c. In the second sentence of the second paragraph, it should be clearly indicated that comparisons to background/upgradient data was conducted for inorganics only.
 - d. In the third sentence of the second paragraph, the words "upper trophic level receptor" should be used in place of "predator wildlife."
 - e. Some discussion of the sediment samples relative to screening criteria and background are included here. It is noted that barium does not have a literature

screening value available. The paragraph notes that "Barium is not widely distributed, exceeded background in only one sample; and does not have a literature screening value available; thus, the potential for unacceptable risk is likely to be negligible." Although this language is similar to that in the final RI, it may make sense to delete the part about barium not having a screening value available as one of the reasons that the potential for unacceptable risk is likely to be negligible. Maybe add something like, "No distribution patterns indicative of a release from the Site was identified."

9. Section 7.2, Record of Decision, page 8: First paragraph, 3rd line, "a final" is repeated (twice). Please correct.
10. Box on right column, page 8: Please add an email address for Ms. Gonzalez and Mr. Rodríguez so that commenter's can send comments via email to any of the people listed.
11. Glossary: Background: In the last sentence of this definition, it should be clearly indicated that background concentrations are factored in during the risk management portion of the process; it is incorrect to state that they are "subtracted."