



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board
35 Years of Environmental Management

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Office of the Chairman

November 2, 2007

Mr. Kevin Cloe
Code EV41
NAVFAC Atlantic
6506 Hampton Blvd.
Norfolk, VA 23508-1278

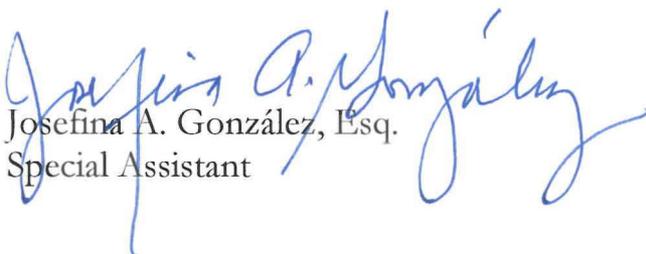
**RE: DRAFT FINAL WORK PLAN REMOVAL ACTIONS SWMU 6,
SWMU 7, AOC J, AND AOC R**

Dear Mr. Cloe:

The Environmental Quality Board (EQB) has reviewed the subject document. Attached you will find our comments.

Do not hesitate to contact me at (787)767-8056 if you have any questions regarding our comments to this reviewed document.

Sincerely,


Josefina A. González, Esq.
Special Assistant

cf: Mr. Christopher T. Penny, P.E.
Vieques Project Coordinator

Mr. Danny Rodríguez
Remedial Project Manager
Environmental Protection Agency

Mr. Richard Henry
US Fish and Wildlife Service

PREQB TECHNICAL EVALUATION

DRAFT FINAL WORK PLAN REMOVAL ACTIONS SWMU 6, SWMU 7, AOC J, AND AOC R, FORMER NAVAL AMMUNITIONS SUPPORT DETACHMENT, VIEQUES, PUERTO RICO, AUGUST 2007

INTRODUCTION

This Technical Evaluation is provided of the Draft Final Work Plan Removal Actions SWMU 6, SWMU 7, AOC J, and AOC R, Former Naval Ammunitions Support Detachment, Vieques, Puerto Rico, August 2007.

The Draft Work Plan describes removal actions at Solid Waste Management Unit (SWMU) 6, SWMU 7, Area of Concern (AOC) J, and AOC R at the former Naval Ammunitions Support Detachment (NASD) in the western part of Vieques Island. The overall goal presented in the Draft Work Plan is to eliminate the uncertainty of the debris being a potential future source of contamination by removing the debris and associated contaminated soil, if present.

The Responses to Comments to the Draft Work Plan (March 2007) were discussed in meetings held on June 26, 2007 in Vieques, Puerto Rico.

This Technical Evaluation chiefly considers whether comments to the Draft Work Plan were addressed as discussed. Only outstanding deficiencies are identified below.

GENERAL COMMENT

The Work Plan should be expanded to include text clarifying that groundwater sampling will be conducted. Based on discussions during the June 2007 meeting, it is anticipated that the sampling will be conducted by CH2MHill in accordance with the Master QAPP.

PAGE-SPECIFIC COMMENTS

Section 2.7.1, Paragraph 2. Restoration of the mangrove wetland within SWMU 6 is proposed by regrading the area following remediation and planting appropriate mangrove species within the disturbed areas. In order to verify successful restoration, it is recommended that a monitoring program be

initiated following the completion of the proposed site restoration efforts. The monitoring program should involve inspections of the restoration area (twice a year) with brief reports prepared that detail survival/vigor of the transplanted mangroves, establishment of volunteer mangroves and a qualitative assessment (e.g., abundant, common, uncommon, rare) of plant occurrence (species-specific) within the restoration area. Two or three permanent photographic stations should also be identified and photographs of the restoration area from these stations provided with each monitoring report. A brief summary of the monitoring program should be provided in the text of the Work Plan. *Alternatively, please clarify what methods will be employed to ensure that mangrove restoration is successful.*

QAPP Worksheet #9. The comment was not addressed that requested clarification whether NOAA will require sampling of surface water and sediment as part of the SWMU 6 confirmatory protocol. If surface water and sediment sampling are required, various worksheets and portions of the SAP will need to be updated to include these matrices.

QAPP Worksheet #15.

- a. The solid sample worksheets included action limits for only the Region IX Industrial PRGs. Residential PRGs are applicable and should be included on the table if controls are not in place at the Municipal Landfill that ensures that the soil will not be taken by residents for home use. In addition, ecological project action limits must be provided for soil since Worksheet #17 states that an ecological risk assessment will be performed with the soil results.
- b. The surface water worksheets did not include project action limits stating this was not applicable because samples are collected to characterize the surface water only and not action limits were therefore not needed. However, Worksheet #17 states that an ecological risk assessment will be performed. Therefore, the project action limits should be provided for surface water.
- c. The solid sample worksheets did not include any project action limits for sediment. Since an ecological risk assessment will be performed, these should be provided.
- d. As requested above, background values for metals were not added to the metals worksheets for soil/sediment samples. Since these are also listed in Worksheet #17 as being used for comparison to metals results, these must be provided in Worksheet #15.

- e. Once the additional project action limits mentioned above are included in Worksheet #15, an evaluation must be performed to determine if any of the project action limits will not be achievable by comparing these values to the laboratory's quantitation limits. If it is determined that some project action limits are not achievable and the data are critical to the objectives of the program, potential method modifications (i.e., use of SIM) or alternate methods (i.e., ICP/MS) must be investigated.

Worksheet 17

Debris and Soil Removal. The use of industrial PRGs and a maintenance worker exposure scenario is not protective should the soil slated for cover material at the landfill be stockpiled at the landfill where residents will have access to the soil. Therefore, residential PRGs should be used to determine whether the soil is acceptable for landfill cover unless controls are in place to ensure that removal and use of the soil by residents does not occur. *PREQB acknowledges that the Navy is working with the Municipality to determine control measures should the soil be stockpiled at the landfill and used for daily cover. Should such controls be established to ensure soil cannot be removed and used by residents, the industrial PRGs and maintenance worker exposure scenario is acceptable.*

Post Excavation Sampling Analysis and Evaluation, Paragraph 1. Please provide a specific reference to the confirmatory sampling protocol. This section references a "work plan attachment (see above)." Please clarify.

QAPP Worksheet #30. TPH-DRO in aqueous matrices was removed from this worksheet. If this analysis will be performed on surface water samples, it should be included. The original comment was: SW-846 3510C should be the preparation method listed for TPH DRO in aqueous matrices (not 3550B).