



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board

156 8
Environmental Emergencies Response Area

June 2, 2008

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

**RE: DRAFT RECORD OF DECISION AREA OF CONCERN (AOC) H,
FORMER NAVAL AMMUNITION SUPPORT DETACHMENT,
VIEQUES, PUERTO RICO, MAY 2008**

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has completed its review of the Navy's Draft Record of Decision Area of Concern (AOC) H, Former Naval Ammunition Support Detachment, Vieques, Puerto Rico, dated May 2008. Enclosed our comments.

Please contact me at (787) 767-8181 X.6141 if you have any questions or comments about our review.

Cordially,

Wilmarie Rivera
Wilmarie Rivera
Federal Facilities Coordinator

cc: Daniel Rodríguez - EPA
Richard Henry - FWS
Brett Doerr - CH2M Hill
Daniel Hood - Navy
Christopher Penny - Navy

PREQB Technical Evaluation

Draft Record of Decision Area of Concern H, Former Naval Ammunition Support Detachment, Vieques, Puerto Rico, May 2008

INTRODUCTION

This review is of the Draft Record of Decision Area of Concern H, Former Naval Ammunition Support Detachment, Vieques, Puerto Rico, May 2008. During this review, the following document was consulted:

1. Optimizing the Decision Process through the “improved” Record of Decision (iROD), Naval Facilities Engineering Command, April 7, 2008.

PAGE-SPECIFIC COMMENTS

Page 5, Figure 3. For consistency, please replace “soil” with “surface soil, subsurface soil” in the Future Resident exposure scenario. The other receptor descriptions specify surface and/or subsurface soil.

Page 7, Figure 4. The symbols used in Figure 4 and the legend should be verified. It appears that the symbols for monitoring well location and surface soil/soil boring location have been switched. For example, in the figure, MW01 is depicted with the symbol for surface soil/soil boring locations. The numerous surface soil/soil boring samples around Building 13 are depicted with the symbol for monitoring well locations.

Page 8, Section 2.5.1, Paragraph 1. Please remove the parenthesis in the second sentence. The highest level of human exposure is not necessarily the maximum concentration. It is unclear why this parenthetical phrase is included in this sentence. Also, the third sentence states that the RME point concentrations were used to calculate non-cancer hazards. However, no such similar statement is made for the concentrations used to calculate cancer risks. Please include cancer risks in this sentence. Also, please remove the word “point” from the phrase “RME point concentrations.” It is less confusing to read “RME concentration” as this phrase was used in the first sentence and the ROD does not go into detail on the concept of an exposure point concentration.

Page 8, Section 2.5.1, Paragraph 2. Please revise the first bullet to be consistent with the language used in the Proposed Plan. The Proposed Plan states the “...groundwater at the site is brackish and, therefore, would require filtration/treatment to remove suspended particulates prior to potable use...” Please change “as groundwater would likely be filtered” to “as groundwater is brackish and would require filtration prior to potable use.”

Page 9, Section 2.5.1, Paragraph 3. The third sentence should be revised for clarity. The risk assessment indicates that vanadium may pose an unacceptable health hazard. However, vanadium is likely attributable to background. Therefore, past Navy activities are not associated with unacceptable health hazards. Please revise this paragraph accordingly. Note that the revision should also use the term “hazard” rather than “risk” when discussing noncarcinogenic compounds for consistency.

Page 9, Table 2. The text should be revised to clarify Table 2. As indicated in the April 7, 2008 iROD document, Table 2 presents “unacceptable risks.” Additionally, please revise the table title.

Page 10, Section 2.5.2, Paragraph 1. The Remedial Investigation Report and Proposed Plan indicate that the ERA step-wise process follows both Navy and EPA policy and guidance. Please clarify why only Navy guidance is referred to in the first sentence.

Page 10, Section 2.5.2, Paragraph 2. Please replace the phrase “effects levels” with “exposure level” in the sixth sentence.

Page 10, Section 2.5.2, Paragraph 2. The third sentence currently states that “...zinc was the only chemical with a LOAEL above one and NOAELs were not exceeded...” This statement should be corrected to: “...zinc was the only chemical with a NOAEL above one and LOAELs were not exceeded...”

Page 10, Section 2.5.2, Paragraph 3. It is unclear why only lower trophic level receptor risks are discussed in this paragraph. Please clarify why site risks to upper trophic level receptors were also found to be acceptable in this paragraph.