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**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND  
ATLANTIC  
6506 HAMPTON BLVD  
NORFOLK VA 23508-1278

TELEPHONE NO:

IN REPLY REFER TO:  
October 8, 2004

Division of Environmental Planning and Protection  
U.S. Environmental Protection Agency  
Region 2  
Attn: Mr. Adolph Everett, P.E.  
Chief, RCRA Programs Branch  
290 Broadway  
New York, New York 1007-1866

Re: Atlantic Fleet Weapons Training Facility (AFWTF), Vieques Island, PR; Draft Final Work Plan and Sampling and Analysis Plan soil and Groundwater Background Investigation.; Draft Phase I RCRA Facility Investigation Report; EPA I.D. # PRD980536221

Dear Mr. Everett:

The Navy has received your letter dated August 6, 2004 which includes comments from The United States Environmental Protection Agency (EPA) and the Puerto Rico Environmental Quality Board (EQB) regarding the Draft Final Work Plan and Sampling and Analysis Plan, Soil and Groundwater Background Investigation. In addition, the Navy has received your letter dated August 26, 2004 which includes comments from the agencies regarding the Draft Phase I RFI Report.

Based on the discussions at our meeting on September 28, 2004 regarding the Background Investigation Work Plan, the Navy proposes to prepare a Technical Memorandum to present the objectives and technical approach for completing the Background Investigation. In addition, the Technical Memorandum will address the key technical issues that were discussed at the September 28<sup>th</sup> meeting.

A Draft of the Technical Memorandum for the Background Investigation will be submitted for your review by October 28<sup>th</sup>. We will present a summary of the key issues to be included in the memorandum during the CTC meeting on October 21, 2004. We propose to revise the Draft Final Work Plan For the Background Investigation within 45 days of reaching agreement of the technical approach presented in the memorandum.

As discussed at the September 28<sup>th</sup> meeting, the conclusions of the Draft Phase I RCRA Facility Investigation (RFI) for the 12 sites will be dependent on the results of the Background Investigation. Specifically, recommendations for subsequent actions (i.e., No Further Action, a Phase II RFI) at each the 12 RFI sites will be based on the results of the risk assessment and Background Investigation. Therefore, it is proposed that the revised Draft Phase I RFI Report be postponed until the Background Investigation and report is completed. Although we propose deferring the submittal date of the Draft RFI Report, we propose submitting responses to the RFI Report comments by December 1, 2004. Within 75 days of reaching agreement on the Draft Background Investigation Report and the responses to the comments on the Draft Phase I RFI Report, we will submit a revised Draft Phase I RFI Report.

As requested in your August 26<sup>th</sup> letter, the Navy proposes to submit a Draft Phase I RFI work plan for the nine PAOC / PI sites by December 1, 2004.

We request a conference call during the CTC Meeting on October 21, 2004 to further discuss this approach and to address any initial comments you may have on the Technical Memorandum. In

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addition, we propose a meeting in your office to discuss the Navy's responses your comments on the Draft RFI Report. If you have any questions, please don't hesitate in contacting me at 757-322-4815.

Sincerely,

A handwritten signature in black ink that reads "Christopher T. Penny". The signature is written in a cursive style with a large, stylized initial "C".

Christopher T. Penny, P.E.  
Vieques Project Coordinator  
Environmental Programs Branch  
Environmental Division  
By direction of the Commander

Copy to:

PREQB (Mr. Esteban Mujica Cotto, Chairman)

PREQB (Yarissa Martinez)

LANTNAVFACENGCOM (Mr. Byron Brant)

2DEPP-RPB (Messrs. Tim Gordon, Daniel Rodriguez)

DOI (Messrs. Cal Garnet, Oscar Diaz, Felix Lopez)

CH2MHILL (Mr. John Tomik)