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Technical evaluation on the documents entitled:
Draft Final Work Plan and Sampling and Analysis Plan Soil and Groundwater Background Investigation Atlantic fleet Weapons training facility Vieques Island, Puerto Rico; Final Work Plan for Groundwater Baseline Investigation at U.S. Navy's Eastern Maneuver Area, Vieques Island, Puerto Rico; Final Description of Current Conditions Report Atlantic Fleet Weapons Training Facility, Vieques Island, Puerto Rico; Final Master Work Plan Atlantic Fleet Weapons Training Facility, Vieques Island, Puerto Rico and the Final Site Specific Work Plan Phase I RCRA Facility Investigation Atlantic Fleet Weapons Training Facility (AFWTF) Vieques Island, Puerto Rico

Prepared for the Office of the Commissioner of Vieques and Culebra
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The following is a technical evaluation on the documents discussed at the USEPA, U.S. Navy and Puerto Rico Environmental Quality Board presentation to the Vieques Community on August 15, 2002, and the evaluation of the documents utilized at the said meeting. The documents identified as Draft Final Work Plan and Sampling and Analysis Plan Soil and Groundwater Background Investigation Atlantic Fleet Weapons Training Facility Vieques Island, Puerto Rico; Final Work Plan for Groundwater Baseline Investigation at U.S. Navy's Eastern Maneuver Area, Vieques Island, Puerto Rico; Final Description of Current Conditions Report Atlantic Fleet Weapons Training Facility, Vieques Island, Puerto Rico; Final Master Work Plan Atlantic Fleet Weapons Training Facility, Vieques Island, Puerto Rico and the Final Site Specific Work Plan Phase I RCRA Facility Investigation Atlantic Fleet Weapons Training Facility (AFWTF) Vieques Island, Puerto Rico

Our comments are limited to those elements related to our field of expertise and the Office of the Commissioner for Vieques and Culebra statutory responsibilities. It does not cover other aspects not related to the ones indicated. The report does not include detailed comments on analytical or sampling procedures, since those are to be covered in detail by the responsible regulatory agencies. Should you have any comments or doubts about the above information, please direct your comments or doubts in writing to Dr. Juan Fernández, Commissioner, Vieques y Culebra, Fernández Juncos 635, San Juan, Puerto Rico 00907.

As indicated on the "Final Work Plan for Groundwater Baseline Investigation at U.S. Navy's Eastern Maneuver Area, Vieques Island, Puerto Rico", the purpose of the investigation was to "establish baseline groundwater quality, regional groundwater flow patterns along the western perimeter of the Navy facility, and to determine whether activities at the Navy's Facility have impacted groundwater at the western perimeter of the Facility; and if such impacts are indicated, are they currently or in the future, likely to migrate offsite into the non-Navy owned areas of Vieques Island". Recent developments indicate that the U.S. Navy has been less than truthful in providing information about using in the past a series of highly dangerous chemicals and biological agents in the general area of the Island of Vieques. The documents presented do not address at all for the testing for the presence of these materials, nor does it take any provisions to do the sampling and testing work in a manner that will provide for the protection of the personnel conducting those tasks.

Thus, and based on these findings, it is strongly recommended that a moratorium be placed on this Plan, until such a time as the U.S. Navy discloses all of the data regarding the chemicals and biological agents, and a determination be made as to possible amendments to the Plans.

Plans Evaluation

We are going to initiate our report with the discussion of several items that were presented during the community meeting that are relevant to the discussion of the individual sites. These comments are limited to the general concept of the meeting and the reports indicated, and should not be interpreted as a refusal or endorsement by the Government of the Commonwealth of Puerto Rico of the Plans and the data presented.

Our findings indicate that the proposed study does not comply with the present regulatory requirements based on present knowledge of the sites, nor does it establish the baseline groundwater quality, regional groundwater flow patterns along the western perimeter of the Navy facility, or determine whether activities at the Navy's Facility have impacted groundwater at the western perimeter of the Facility; or whether such impacts are likely to migrate offsite into the non-Navy owned areas of Vieques Island.

It is our professional opinion, that in order to comply with the basic requirements for the Plans and the Puerto Rico Regulations for Hazardous and Non-hazardous Solid Waste, and the types of materials that so far have been identified or documented as used in the past or present in Vieques, and related to the AFWTF facilities at Vieques Island, as a minimum, the following analyses to all samples must be added to Table 2-1 of the Plan.:

- Nitrite and Nitrates as N
- Phenolic Substances
- Conductivity
- Oil and Grease
- Phosphorus
- Sulfides (H₂S non-ionized)
- Total Petroleum Hydrocarbons (TPH)
- Sulfate
- Trioctyl phosphate (tri (2-ethylhexyl) phosphate)
- Radioactivity (Alpha total, Beta total, Radium total, Radium 225 total)
- Orange Agent (2,4,5-trichlorophenyl oxyacetic acid (2-4-5T))
- Tritonal
- H-6
- RDX (cyclonite)
- Torpex
- TNT (trinitrophenol)
- 4-amino-2,6-dinitrotoluene
- 2-amino-4,6-dinitrotoluene
- Composition B

- Octol
- Tetryl (trinitrophenylmethylnitramine)
- Explosive D
- Composition A-3

Comments on Specific Sites

The following are our comments of the specific sites selected for investigation and potential remedial action. Please be aware that these comments require further evaluation based on recent developments, and that the mere correction of these items does not correct the problem:

SWMU 01- Camp Garcia Landfill (Camp Garcia)

This site is located at about 4,000 feet north of Blue Beach. This Solid Waste Management Unit (SWMU) was active from at least 1954 to 1978. General domestic and military waste was deposited at this site. The site was covered with "native soils". The area has been defined by the Puerto Rico Environmental Quality Board as covering about 200 acres. CH2MHILL indicates that they believe it's only 55 acres in area.

The proposed investigation includes a geophysical survey using magnetometer and/or EM methods. In addition an observation well up-gradient, another down-gradient and three observation wells at the site will be installed. It is recommended that prior to the selection of the location of these wells, the geophysical survey be completed to determine actual extent of the affected area. In addition, it is indicated that 50 surface (sic.) soil samples were or will be taken at the site. We have to assume that these samples will be taken of the material under the soil cap and not on the surface, since otherwise the only data to be obtained from these samples will be the characterization of the "native soil".

Based on information recently acquired, it is our firm opinion, that since there exists the distinct possibility that this site could have been used in the past for the disposal of chemical or biological agents, packing materials of those components and excess material, the sampling program be expanded to treat this site as an extremely hazardous site. This would require a detailed risk assessment evaluation prior to sampling and testing, and a much more detailed sampling program than the one proposed..

SWMU 02- Fuels Off-loading Site (Camp Garcia)

This site was the location of a fuel off-loading operation, located at Camp Garcia, and an underwater fuel line that unloaded the fuel from vessels. At every off-loading operation, the line was flushed with seawater prior to off-loading. Conservative estimates are that over 100,000 gallons of oil were discharged at the coastal area between Bahía Tapón and Bahía de la Chiva to the south of Vieques.

At this site, it is to be expected that heavy subsoil contamination with petroleum products and residues be found. Even though the site shows minimal visible signs of this activity and there are no visible stains, there is a significant possibility of contamination of the underlying soil or sand. Prior experience in Puerto Rico (Zoe Colocotronis, US District Court 1977, Civ. 252-73, Civ. 309-73, civ. 985-73), in an area very similar in climate and geology to the one affected in

Vieques, indicates that these petroleum products maintain their presence and integrity for many years or even thousands of years, to the point that it is possible to accurately fingerprint these residual products to their original source many years after the spill. At present, 29 years after the referred to incident, oil continues to seep through the sand and soil. Thus, there is a mayor potential for these materials to be found at the Vieques site.

The Plan indicates that sampling will be limited to 12 surface samples and two soil borings in the general area of the tanks. No sampling is indicated for the shoreline areas or adjacent beaches. We believe that this amount and location of sampling is totally inadequate and insufficient. As indicated before, petroleum products will maintain their integrity and thus their presence in soils for many years. In addition, they tend to slowly percolate down in the soil, leaving a visually clean surface layer. In order to clearly establish the affected area, it is strongly recommended that soil borings be conducted in the general area and down current of the spill area to define the extent of the petroleum products plume. These soil borings should be down to bedrock or water table, whichever is shallower, and must include sampling and testing every ten to twelve inches.

SWMU 04- Waste Areas of Building 303 (Camp Garcia)

This area, located near Building 303 of Camp Garcia, includes an area utilized for the accumulation and disposal of spent batteries fluids, batteries, hydraulic oil, cleaning and degreasing materials, cleaning rags, absorbents, grease and other unidentified materials. The area consisted of a catch basin for used oil, a cleaning materials and degreasers basin and a storage area for rags, adsorbent materials and grease. These activities were initiated in the 1960's or before, and continue at present.

The Plan treats this site, to say the least, in a very superficial manner. It indicates that 12 surface soil samples were taken and analyzed. It also indicates that in addition, one soil boring will be conducted outside the catch basin, and several additional soil samples will be taken.

We believe that this amount of sampling is totally inadequate and insufficient. Most of the components of this group of contaminants will maintain their integrity, and even worst, the combination of battery acids and petroleum products can degrade into extremely hazardous components. In addition, these materials will stay in the soil for many years, and some of these components will slowly percolate down into the soil, leaving a visually clean surface layer. In order to clearly establish the extent of the affected area, it is strongly recommended that additional soil borings be conducted in the general area of the SWMU-04 to define the total extent of the contaminant plume. These soil borings should be down to bedrock, and must include sampling and testing every ten to twelve inches.

SWMU 05- Spent Battery Accumulation Area (Observation Post 1 (OP-1), Inner Range, AFWTF)

This site was used for the accumulation of what is described as a minimum number of batteries on an outside gravel driveway. Battery liquids were drained, collected and shipped to Roosevelt Roads for disposal. There are no visible signs of spills at the site.

Four soil samples are recommended for this area. We concur with the recommendation for the number of sampling points, except that they should be taken to include at least samples on the surface and at three (3) feet depth, with a composite made of the total sample for analytical purposes.

SWMU 06- Waste Oil and Paint Accumulation Area (Seabees Area, Camp Garcia)

This area consisted of a disposal area for a paint shop located on Building 303. Liquid waste, including solvents, degreasers, paints, oil, lubricants and related waste was released at this site from 1990 to present. These materials were disposed in the immediate grassy area of the Building.

We believe that the presence of contaminants in the area as result of these activities could be minimal. We concur with the sampling program delineated in the Plan, with the recommendation that should any of these materials be found at the site as a result of the sampling program, they should be removed and disposed of in accordance to the applicable regulations.

SWMU 07- Waste Oil Accumulation Area (outside of Building 303 at Camp Garcia)

This site consisted of an area near Building 303, where Marines disposed of their oily waste by mixing it with sand, and disposing of it by shipping it to Roosevelt Roads for disposal. Very little information is known about the site.

We believe that the presence of contaminants in the area as result of these activities could be minimal. We concur with the sampling program delineated in the Plan, with the recommendation, that should any of these materials be found at the site as a result of the sampling program, they should be removed and disposed of in accordance to the applicable regulations. In addition, it is recommended that proper used oil collection and disposal procedures within the established regulatory requirements be instituted immediately.

SWMU 08- Waste Oil Accumulation Area (Observation Post 1, Inner Range, AFWTF)

This site consists of an used oil accumulation area. Used oil was stored in 55-gallon drums until shipment to Roosevelt roads. The accumulation started about ten years ago, and the activity continues.

We believe that the presence of contaminants in the area as result of these activities could be minimal. We concur with the sampling program delineated in the Plan, with the recommendation, that should any of these materials be found at the site as a result of the sampling program, they should be removed and disposed of in accordance to the applicable regulations. In addition, it is strongly recommended that proper used oil collection and disposal procedures within the established regulatory requirements be instituted immediately.

SWMU 10- Sewage Treatment Lagoons (Camp Garcia)

At this site, it is indicated that the wastewater treatment unit was installed in the early 1950's. This information is not correct. The sewage treatment system for Camp Garcia since the early 1950's was a holding pond that was located south of the runway, with a direct overflow pipe

into the sea at Bahia Corcho. As a result of the discovery in 1971 of this situation by Eng. Rafael Cruz Perez, at that time the Associate Director for Air and Water resources of the Puerto Rico Environmental Quality Board, the discharge was changed to a "land spreading" disposal method in 1971-72. This "land spreading" system was utilized until 1976 when a system of unlined treatment ponds was installed with a discharge into an evaporation pond.

Although we concur with the sampling program delineated in the Plan for the ponds already identified, it is strongly recommended that a thorough record and physical search for the original pond be conducted, and a similar sampling program implemented for that or those pond(s).

SWMU 12- Solid Waste Collection Unit Area (Observation Post 1, Inner Range AFWTF-formerly AOC B)

This site consists of a garbage collection area at the OP-1 location. The type of garbage stored is not identified. Material was stored in boxes metal dumpsters and cans. No further information is available.

We believe that the presence of contaminants in the area as result of this activity could be minimal. We concur with the sampling program delineated in the Plan, with the recommendation, that should any of these materials be found at the site as a result of the sampling program, they should be removed and disposed of in accordance to the applicable solid Waste regulations.

AOC-A- Diesel Fuel Fill Pipe Area (Observation Post 1, Inner Range, AFWTF)

This site consists of a pipe that was used to fill an underground storage tank located at OP-1. After a series of inconclusive intents to close the site and remove the contamination provided, the storage tank was removed and replaced with another tank somewhere in 1997

We believe that the presence of contaminants in the area as result of this activity will be minimal. We concur with the sampling program as delineated in the Plan, with the requirement that a Closure Certification be obtained from the Puerto Rico Environmental Quality Board for this tank.

AOC-F- Rock Quarry (Camp Garcia)

This site is located southwest of the former Camp Garcia landfill. The quarry was utilized for many years to provide fill material for Camp Garcia and maintenance of the roads and trails in the area.

We believe that the presence of contaminants in the area as result of this activity could be minimal. We concur with the sampling program delineated in the Plan.

AOC-G- Pump Station and Chlorinating Building at Sewage Lagoons (Camp Garcia)

This site is located in the general area Camp Garcia, and there are some doubts as to the date in which it was established. Although the unit was supposed to be in operation, it was not

observed or recorded as existing during the 1971 visit and inspection by the Puerto Rico Environmental Quality Board.

We believe that the presence of contaminants in the area as result of this activity could be minimal. We concur with the sampling program as delineated in the Plan, with the requirement that a Closure Certification be obtained from the Puerto Rico Environmental Quality Board for these facilities.

Other Potential Areas of Concern

Even though some additional sites were deemed as potential areas of concern (PAC), the document does not discuss why they were discarded as such. Based on the experience obtained at the Naval Ammunition Support Detachment Property about the mishandling of the operation of those properties, it could be logical to assume that the same pattern at the eastern area could be similar, and that there is a need to conduct some further investigation of these other sites.

PAOC-I- Former power plant and mechanics shop northeast of Bldg. 303 at Camp Garcia (structure still exists)

This unit consists of a concrete building and oil tank that was used as a power plant. Although there is no evidence of tank releases, based on the U.S. Navy operational record in the area, there is a major possibility that some of the fuels used would have reached the ground. Any evaluation of the area should include plume definition, surface soils and possible remedial action to be conducted.

PAOC-J- Former vehicle maintenance area at Camp Garcia (all structures were demolished prior to 1980)

This site consists of a concrete pad utilized as a vehicle wash area. The site is suspect of being impacted by wash waters, lubricants, oil, petroleum products, commercial cleaning agents, degreasers and solvents. We believe that the issue of where this unit was located should be thoroughly studied, in particular for groundwater's and soils contamination

PAOC-K- Former wash rack area north of main road (structure demolished prior to 1980)

This wash rack was also identified as south of the road. This site consists of a concrete pad utilized as a vehicle wash area. The site is suspect of being impacted by wash waters, lubricants, oil, petroleum products, commercial cleaning agents, degreasers and solvents. We believe that the where this unit was located should be thoroughly studied, in particular for groundwater's and soils contamination

PAOC-L- Former paint and transformer storage area (structure still exists)

This area consisted of the disposal area for a paint shop located at Camp Garcia. Liquid waste, including solvents, degreaser, paint, oil, lubricants and related waste were disposed in the immediate area of the storage area.

Although we believe that the presence of contaminants in the area as result of these activities could be minimal, we recommend that a similar sampling program as the one delineated for

SWMU-06 be conducted, with the recommendation that should any of these materials be found at the site as a result of the sampling program, they should be removed and disposed of in accordance to the applicable regulations.

Other Facilities Identified by CH2MHILL but not Investigated:

There are some additional facilities identified on the various reports, which indicate soil alteration, vegetation anomalies and other environmental signs of man made activities. These sites are discarded without further explanation. Based on past suspicions and recent disclosures by the U.S. Navy, we believe that all of these sites require further investigation to assure that no activities that may endanger the health and welfare of the people of Vieques, the environment and the actual properties affected.

- A closure report for a UST at AOC-A on or about July 1997. 15,000-gallon diesel tank. Subject to verification at Puerto Rico Environmental Quality Board records.
- Six small arms ranges (SAR's).
- Filling Station (demolished).
- Boiler(s) (removed).
- Small Arms ranges 1, 3, 6 and 9.
- Suspect areas identified on Tables 2-1 and 2-2.

Other Potential Contaminated Sites

It is not possible from the documentation presented to clearly determine the procedures utilized or sources investigated to determine potential contaminated sites at the facility or guidance utilized to determine whether a site was only a potential site, or was determined to be a Solid waste management unit. A more complete explanation of the procedures must be outlined, and rationale for accepting or discarding the different sites discussed. In accordance to the experiences of government officials and concerned citizens about activities that have been observed in the past at the properties included on these reports, it is concluded that there are a considerable amount of other known sites that should be investigated as part of this Plan. Among some of the additional areas of concern that we believe should be discussed are:

Artillery impact (target) area east of Laguna Puerto Diablo

This sector comprises a large area east and south of Laguna Diablo. This area was utilized as an artillery impact area until the 1970's. The gun positions were located on the periphery of this area. It must be noted, that it was common practice of the artillery to excavate powder pits and latrines near the gun positions. At the powder pits, the extra powder bags were burnt as an open fire. This burning of powder leaves in the ground large quantities of chemicals. The latrines were closed by dumping all kinds of garbage generated at the gun positions, and then backfilled with soil from excavation and the surrounding area. Some of the aerial photographic analysis of this general area has identified several disturbed sites. These disturbances are consistent with this type of activity.

Bull's eye target 2, 0.5 kilometers west of Laguna Puerto Diablo

This target was used for many years until the late 1960's, when the target line was moved to a location east of OP-1. This site has a potential for the presence of unexploded ammunition. Further evaluation of this area is warranted, including soil sampling.

Ranges 1, 2, 3, 4, 4a, 4b, 5, 6, between Punta Brigadier and Punta Campanilla on the north coast of Vieques

These ranges were used for small arms fire. Further evaluation of these areas is warranted, including soil sampling.

Ranges 7, 8, 9 north of Punta Carenero

These ranges were used for small arms fire. Further evaluation of these areas is warranted, including soil sampling.

Camp Garcia sewage holding tank or pond

This pond was located south of the runway, with a direct overflow pipe into the sea at Bahia Corcho. The discharge was changed to a "land spreading" disposal method in 1971-72, until 1976 when a treatment plant was installed with a discharge into an evaporation pond.

Other solid waste disposal units

Several solid waste disposal units were, or still are located east of Camp Garcia, which include:

Runway

There is an active military airstrip located south of Camp Garcia. The airstrip has been utilized for loading and unloading operations since the early 1950's. Experience at other sites has indicated that loading and unloading areas are prime suspects in the contamination of the soil and underground waters. This contamination results from the chronic leaking of lubricants, accidental spills, fuel and fluids from the aircrafts as well as the discarding of waste or damaged material in the areas immediate to the loading and unloading area.

Loading and unloading areas

There are several loading areas, both at Camp Garcia and some of the near beaches. Experience at other sites has indicated that loading and unloading areas are prime suspects in the contamination of the soil and underground waters. This contamination results from the chronic leaking of lubricants, accidental spills, fuel and fluids from the transporting vehicles as well as the discarding of waste or damaged material in the areas immediate to the loading and unloading area.

Quarries

Quarrying operations were conducted in the area for the extraction of material for the maintenance of roads and facilities. In addition a significant "caliche" extraction was conducted for the construction and maintenance of the runway. There were also several material extraction on the lands bordering the roads.

Other open burn/open detonation areas

Government officials and local people recall that the activities of detonating or open burning ammunition and/or other unidentified waste were conducted at several other sites not included in the investigation.

Asbestos containing materials

Asbestos containing material is present at several structures. This material is considered by the Navy as Non-friable material, thus not subject to regulatory action. Prior to the occupation of any of these buildings, an asbestos containing material survey and abatement project must be conducted in accordance to the Puerto Rico Environmental Quality Board Regulation for the Control of Asbestos Containing Abatement Activities.

PCB containing units

No mention is made of PCB containing units, thus it must be assumed that they have not been evaluated, and that they exist on site.

Lead paints

Since most of the structures on site were constructed before 1978, they have to be assumed to contain lead-based paint. Lead from paint, paint chips and dust can pose health hazards if not managed properly. It must be noted, that the structures at the site were built (1960-61) before 1980, the cut-off date when lead based paints (LBP) were eliminated from the market, thus, lead based paints, such as enamels, lacquers, varnishes or floor paints, are expected to be on site.

Closing Statement

We want to emphasize, that recent developments indicate that the U.S. Navy has been less than truthful in providing information about using in the past a series of highly dangerous chemicals and biological agents in the general area of the Island of Vieques. There is a strong possibility that this information that was denied even to the Congress of the United States of America, was also denied to the investigators and scientists preparing these documents. Since the documents presented do not address at all for the testing for the presence of these materials, nor does it take any provisions to do the sampling and testing work in a manner that will provide for the protection of the personnel conducting those tasks, we must assume that this data was not made available to the investigators and scientists involved.

Thus, and based on these findings, it is strongly recommended that a moratorium be placed on this Plan, until such a time as the U.S. Navy discloses all of the data regarding the chemicals and biological agents, and a determination be made as to possible amendments to the Plans.

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RCP

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Informe documentos limpieza área este de Vieques			
Comments:	<p>Le incluyo copia del primer borrador sobre los planes propuestos para la evaluación y estudio de las áreas impactadas en el área este de Vieques. Es mi recomendación que se ponga una moratoria a estos estudios hasta tanto la Marina provea todos los datos que tiene sobre las actividades llevadas a cabo por esta en Vieques.</p> <p>Sería recomendable enviarle una copia de esto a Eugene Scott para sus comentarios.</p>		

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