



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board

199
Environmental Emergencies Response Area

April 6, 2008

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

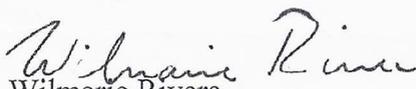
Re: Review of the Draft Action Memorandum Non-Time Critical Removal Action in the Surface Impact Area, Former Naval Training Range, Vieques, Puerto Rico

Dear Mr. Hood:

The Puerto Rico Environmental Quality Board (PREQB) has completed the review of the Navy's Draft Action Memorandum Non-Time Critical Removal Action in the Surface Impact Area, Former Naval Training Range, Vieques, Puerto Rico, dated February 2009. Enclosed our comments.

If you have any questions or comments about our review, please contact me at (787) 767-8181, extension 6141.

Cordially,


Wilmarie Rivera
Federal Facilities Coordinator

cc: Daniel Rodríguez, EPA
Richard Henry, FWS
John Tomick, CH2M Hill
Kevin Cloe, Navy
Christopher Penny, Navy

**PREQB Comments on the
Draft Action Memorandum Non-Time Critical Removal Action
in the Surface Impact Area
Former Naval Training Range, Vieques, Puerto Rico
Dated February 2009**

1. Please include PREQB in the list of acronyms and abbreviations.
2. The header on each page says, "ACTION MEMORANDUM FOR SANDY BRANCH, TRIBUTARY 2, OPERABLE UNIT 1". Please correct.
3. EQB believes that this Action Memorandum is for an interim removal action to efficiently decrease the hazard in the SIA and that additional removal actions will be evaluated for the SIA in the future prior to site closure. This action of an interim removal action is the same as was implemented for the LIA TCRA. EQB recommends that this information (that the action being described in this document is an interim action and that additional evaluation of the SIA will be performed and another decision document will be produced prior to site closure) be added to the document.
4. On Page 6, Section VII A, at the end of the second line please replace the word "Rice" with "Rico".
5. On Page 6, Section VII B, the following statement is made: "As members of the CERCLA Technical Committee the Department of Interior (USFWS), the U.S. EPA (Region II) and the Commonwealth of Puerto Rico (Environmental Quality Board) will continue to be consulted until actions addressing the contaminated area are complete." EQB believes that EPA and EQB have a responsibility for greater and more formal regulatory participation than is implied by this sentence (only being members of the CTC receiving consultation) because Vieques is a CERCLA site. It is recommended that this statement be revised to more accurately reflect the role of EPA and EQB under CERCLA and the FFA.
6. On Page 7, Section X, A. (third bullet) contains the statement: "The BDU 33 type practice bombs are not fitted with a sensitive fuze. If the BDU 33 failed to function upon impact, it would only contain a few grams of energetic material." It is understood that this statement is intended to distinguish between the hazard of a practice bomb spotting charge and HE ordnance. However, accidents occur with old practice bombs and this statement overly minimizes the hazard. BDU 33 practice bombs that fail to function are UXO and should be treated with similar precautions as other UXO. It is recommended that this statement be modified to indicate that there is less hazard associated with practice ordnance without overly minimizing the hazard with phrases such as, "few grams of energetic material".

7. On Page 10, Section X A, "Certification/Disposal of Scrap Metal", 3. (ARARS) the reference to "Table 1" should be to "Tables 1 through 4".
8. Page 10, Section X, A, 4. (Project Schedule) contains "proposed estimated project schedule" and a "proposed project schedule for removal action". Are both of these schedules needed or can they be replaced by one schedule? It is recommended that one schedule be included in the document and that the schedule include projected start and completion dates for the tasks listed.
9. Page 11, Section XIV, says, "This Action Memorandum presents the selected remedial action for the Munitions Response Areas recognized as the Live Impact Area and Eastern Conservation Area, Former Vieques Naval Training Range, Puerto Rico." The underlined portion should be updated to say "Surface Impact Area".
10. Table I-2, please revise the acronyms and abbreviations at the end of the table, EQB believes that some of them are not relate to the project.