



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board

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Environmental Emergencies Response Area

August 18, 2010

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

RE: Technical Review of the Interim Deliverable for Ecological Risk Assessment - SWMU 1, Former Vieques Naval Training Range, Vieques, Puerto Rico

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has completed its review of the Interim Deliverable for the Ecological Risk Assessment - SWMU 1, Former Vieques Naval Training Range, Vieques, Puerto Rico. Enclosed our comments.

Please contact me at (787) 767-8181 X.6129 if you have any questions or comments about our review.

Cordially,

Wilmarie Rivera
Federal Facilities Coordinator

cc: Daniel Rodríguez - EPA
Richard Henry - FWS
Daniel Hood - Navy
Christopher Penny - Navy
Brett Doerr - CH2MHILL

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PREQB Technical Review
Draft Interim Deliverable for Ecological Risk Assessment - SWMU 1,
Former Vieques Naval Training Range, Vieques, Puerto Rico

1. Page 7, Section 1.2.1: The text states that food web modeling will not be conducted for the ephemeral stream. Section 1.1.3 indicates that these ephemeral streams (along with the landfill surface soil) constitute the exposure medium for the site. Please provide additional justification for not conducting food web modeling for these habitats (i.e., do these streambeds have characteristics that would preclude higher trophic level receptors from foraging within these areas?). It would appear that receptors would be able to forage within these areas similarly to the landfill site as most of the samples collected from these ephemeral streams are within the limits of surface soil samples conducted for the landfill site.
2. Page 8, Section 1.3.1: Soil screening guidelines are presented for tin, pyridine and dioxin. Note that the suggested dioxin value of 4.0 pg/g (TEQ based on mammalian Toxicity Equivalence Factors or TEFs) presented in CCME (2007) represents a value protective of human health. Please clarify how this value would be protective of ecological receptors.
3. Page 8, Section 1.3.2: Ingestion toxicity reference values for dioxin are presented for birds and mammals. USEPA (Framework for Application of the Toxicity Equivalence Methodology for Polychlorinated Dioxins, Furan and Biphenyls in Ecological Risk Assessment, EPA/100/R-08/004, June 2008) recommends that bird and mammalian dioxin/furan toxicity reference values be based on egg and diet concentrations, respectively. Please justify the appropriateness of the values presented in Sample et al. (1996) rather than the recommended avian egg and mammalian diet TEQ thresholds for dioxin congeners provided in USEPA (2008).