



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board

PUERTO RICO
VERDE 

277

ENVIRONMENTAL EMERGENCIES RESPONSE AREA

April 25, 2011

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 Draft No Action/No Further Action Decision Document PI 7, PAOC Q and PAOC R, Former Vieques Naval Training Range

Dear Mr. Cloe:

The Puerto Rico Environmental Quality Board (PREQB) has conducted a technical review of the Draft No Action/No Further Action Decision Document PI 7, PAOC Q and PAOC R, Former Vieques Naval Training Range (VNTR), Vieques, Puerto Rico, dated March 2011. Our comments are provided in the attachment.

If you have any questions or comments, please contact me at (787) 767-8181 x. 6129.

Cordially,



Wilmarie Rivera
Federal Facilities Coordinator

cc: Daniel Rodriguez, EPA
Richard Henry, FWS
Brett Doerr, CH2M Hill
Daniel Hood, Navy

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**Technical Review of the Draft No Action/No Further Action Decision Document
PI 7, PAOC Q and PAOC R, Former Vieques Naval Training Range, Vieques, Puerto
Rico, dated March 2011**

GENERAL COMMENTS

1. For discussions of constituents detected in groundwater, it would be helpful for this document to discuss trends observed (i.e., increasing or decreasing concentrations or whether constituents were detected in the latest round of samples).

PAGE-SPECIFIC COMMENTS

1. Table ES-1: Please consider revising the first sentence in the Rationale for No Action/No Further Action Determination column. Drum and contaminated soil removal eliminates past releases and potential future sources of contamination, rather than eliminating past *sources* of contamination, as it currently reads.
2. Page 2-6, Section 2.1.2, ESI Soil Sampling: Please add a brief summary of the analytical results at the end of this section.
3. Page 2-17, Section 2.2, Ecological Evaluation: Please consider rewording the second to the last sentence of the second bullet to read “This suggests that the copper concentrations detected in this portion of PI 7... *are* within the range of background.” This removes one of the two equivocal terms/phrases in this sentence (“suggests” and “may be”). Note that this sentence appears throughout the report in discussing inorganics results, so please consider revising the text throughout the report.
4. Page 2-17, Section 2.2, Additional Comparisons: Please consider adding a sentence to the end of the first paragraph that clarifies why not detecting copper in groundwater is important to this evaluation (i.e., that copper is not leaching to groundwater).
5. Page 3-2, Section 3.1.3: Please include the thickness of the native layer above bedrock. This information is needed to clarify that not all soil material was removed above bedrock prior to sampling. This comment applies to Section 4.1.3 also.
6. Page 3-5, Section 3.2, Ecological Evaluation: Please clarify in the last sentence that the *native* surface soil sample poses not ecological risk and clarify why (i.e., no exposure pathway to native soil located at depth, etc.).