



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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July 25, 2008

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

Re: Review of the Draft Site Management Plan, Fiscal year 2008, Former Naval Facilities, Vieques Island, Puerto Rico

Dear Mr. Cloe:

The U.S. Environmental Protection Agency (EPA) completed the review of the Draft Site Management Plan, Fiscal year 2008, Former Naval Facilities, Vieques Island, Puerto Rico, dated June 2008. Enclosed you will find our comments.

The Federal Facility Agreement, per Section 12.8, Public Participation, requires public participation be provided for the annual amendments of Site Management Plan (SMP). The Draft SMP does not include discussion on how this requirement will be met. Please discuss how the Navy plans to provide timely opportunity for public participation. EPA suggests that the Project Managers have a conference call to discuss this matter.

If you have any questions or comments, please contact me at (787) 741-5201.

Sincerely,

Daniel Rodriguez
Remedial Project Manager
Response and Remediation Branch

Enclosure

cc: Wilmarie Rivera, EQB
Richard Henry, FWS
Daniel Hood, Navy
Christopher Penny, Navy

**EPA Comments on the Draft Site Management Plan
Fiscal Year 2008, Former Naval Facilities
Vieques, Puerto Rico
June 2008**

General Comments:

1. Please modify the SMP title to read “Fiscal Year 2008-2009” instead of Fiscal Year 2008. It better describe the planning for the FYs and it make the title consistent with the first SMP.

Specific Comments:

2. **Section 1.1.4.1, East Vieques (former VNTR), page 1-3:** The last paragraph of the section needs to be updated. The CCP for the Vieques National Wildlife Refuge was made final on August 1, 2007. Please revise.
3. **Section 2.1.3.2, Surface Impact Area, page 2-16:** The second paragraph should include discussion of the amendment to the Phase II ERA/SI work plan to include additional transect evaluation and the wide area assessment (Aerial Magnetometer Survey). Also, discussion of the EE/CA and NTCRA work plan for the MEC surface removal should be included to the last paragraph of the section. It will make it more consistent with Figure 3-2.
4. **Section 2.1.3.3, Eastern Maneuver Area (MRA-EMA), page 2-16:** Discussion of the amendment to the Phase II ERA/SI work plan to include additional transect evaluation and the wide area assessment (Aerial Magnetometer Survey) should be added, similar to comment 2 above.
5. **Figure 2-1, East Vieques Sites To Be Assessed Under CERCLA:** Please modify the description in the legend in the figure for the shaded pink area to read “Munitions Removal Sites.” Munitions Remedial Investigation Sites covers an area greater than just the LIA. Also, the pink shaded area in the figure should be extended to include the ECA.
6. **Figure 2-2, West Vieques Sites To be Assessed Under CERCLA:** What is the purpose of the “Property Line” identified in the legend? It covers the same area as the mustard colored area identifying DOI property. Suggest deleting “Property Line” from the legend in the figure.
7. **Figure 3-1, Vieques Environmental Restoration Program Schedule:** Please add to the SWMU 4 RI Report schedule the additional data collection. Adjust the schedule, if needed.

8. **Figure 3-2, Vieques Environmental and Munitions Response Schedules:** Suggest the figure title be modified to read “Vieques Munitions Response Schedule” since the ERP schedule was separated and presented as Figure 3-1. Also, the “not funded” description should be explained in the legend. It could give the impression that the scheduled work is not included in the Vieques funding projections presented in Table 3-1, hence not funded.