

(804) 445-2993

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APR 20, 1993

U.S. Environmental Protection Agency  
Region II  
Mr. Robert J. Wing, Chief  
Federal Facilities Section  
Jacob K. Javits Building  
New York, New York 10278

Re: Preliminary Assessment, Atlantic Fleet Weapons Training  
Facility (AFWTF), Vieques, PR

Dear Mr. Wing:

This letter is to supplement Naval Station Roosevelt Road's letter of December 29, 1992 regarding the listing of AFWTF on the Federal Agency Hazardous Waste Compliance Docket ("docket"). As requested in NAVSTA's letter, we ask that both AFWTF and Camp Garcia be listed as one facility, called Eastern Vieques, PR.

However, in a recent telephone conversation on March 16, 1993 between Ms. Helen Shannon of your office and Mr. James Szykman of Atlantic Division, Ms. Shannon stated that PA/SI scoring would be required at AFWTF regardless of past HRS efforts and how the facility is listed on the "docket". We strongly disagree with any requirement for additional scoring at the Eastern Vieques Facility for the following reasons.

The Initial Assessment Study (IAS) that was completed in September 1984 covered the Naval Station Roosevelt Roads, NAF Vieques, and Eastern Vieques (Camp Garcia and AFWTF). It is our understanding that the IAS was used to complete the HRS scoring for these facilities in August 1986 which generated a score of 12.56, thereby fulfilling Naval Station Roosevelt Roads initial requirement as mandated by CERCLA.

In addition, it is both DOD and U.S. EPA policy that active military ranges are not regulated under either CERCLA or RCRA. Although the Open Burning/Open Detonation (OB/OD) unit does exist within the range, it is effectively regulated under RCRA. We request that any future action be deferred to RCRA for this discrete unit. If this is not the case, any further action required under CERCLA would violate existing DOD policy and require this issue to be addressed at a higher level within DOD.

Re: Preliminary Assessment, Atlantic Fleet Weapons Training  
Facility (AFWTF), Vieques, PR

If you have any questions or comments concerning this matter,  
contact Mr. James Szykman, Atlantic Division, at (804) 445-2993.

Sincerely,

P. A. RAKOWSKI, P.E.  
Head  
Environmental Programs Branch  
Environmental Quality Division  
By direction of the Commander

Copy to:  
Environmental Protection Agency  
Region II  
Attn: Ms. Helen Shannon  
Jacob K. Javits Building  
New York, New York 10278

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CINCLANTFLT  
COMNAVFACENGCOM 09E  
COMNAVAIRLANT  
NAVSTA Roosevelt Roads (Code NO2C, NO2C-B1, NO2C-B13)  
OESO Indian Head Division (Code 05E)  
NEESA (Code 112E3)

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