

September 12, 2000

VIEQUES

Resource Conservation and Recovery Act (RCRA) Update for Atlantic Fleet Weapons Training Facility (AFWTF): including Eastern Maneuver Area, Camp Garcia, and Live Impact Area

Issuance of RCRA Permit for Open Burning/Open Detonation (OB/OD) Units at AFWTF

! On October 21, 1999, EPA issued a Notice of Deficiency (“NOD”) on AFWTF’s RCRA Permit Application for continued utilization of the OB/OD units for destruction (i.e., “treatment”) of deteriorated or obsolete military munitions which are classified as RCRA hazardous wastes. The October 1999 NOD allowed the Navy to either collect data, or submit existing data to assess environmental baseline conditions; including air impact and noise/vibration impacts.

! On February 29, 2000, the Navy submitted work plans to collect [new] environmental baseline data (for surface and subsurface soils, ground water, and surface water and sediments) and conduct air modeling, but opted to submit existing data for noise/vibration effects from 1978/79.

! EPA issued a NOD on the February 2000 submissions on May 4, 2000. A response to EPA’s May 4th NOD was due July 26, 2000.

! On July 19th, Rear Admiral J. K. Moran, Commander Navy Region Southeast, advised EPA that the Navy was evaluating substantially modifying its RCRA permit application for AFWTF, since with the closing of the Naval Ammunition Storage facility on western Vieques Island, it may no longer need the OB/OD Units at AFWTF for regular destruction (i.e., “treatment”) of deteriorated or obsolete military munitions as RCRA hazardous wastes. On July 20th, the Navy (Commander C.E. Cassidy, Public Works Officer of Roosevelt Roads) requested an extension for responding to EPA’s May 4th NOD.

! On August 4, 2000, EPA approved an extension until September 30, 2000 for the Navy to respond to EPA’s May 4th NOD.

Investigations at AFWTF Under RCRA 3008(h) Consent Order

! A RCRA 3008(h) Consent Order for the Atlantic Fleet Weapons Training Facility (AFWTF), in the eastern portion of Vieques island, was signed by Elsie L. Munsell, Deputy Assistant Secretary of the Navy, on November 14, 1999, and by the Regional Administrator of the United States Environmental Protection Agency (EPA) Region 2, on January 10, 2000. The Order became effective on January 20th.

! The Order requires investigations, and if required, interim and/or final corrective measures at 9 solid waste management units (SWMUs) and 3 areas of concern (AOCs). [An AOC is defined where possible contamination is suspected, but it cannot be clearly linked to releases from a

SWMU.]

! In addition a program of groundwater investigation is required along the Navy's western property line at Camp Garcia, in order to determine whether groundwater is contaminated and could be migrating from the facility into civilian areas in the central part of the island.

! The Navy provided (on March 17, 2000) the following submittals:

1. Work plan for the western perimeter [supplemental] groundwater investigation
2. "Description of Current Conditions" report [first step in the RCRA Facility Investigation (RFI)]
3. They also submitted a report, dated November 1999, on the results of the groundwater investigations conducted along the western perimeter during the summer of 1999. The groundwater investigation report was submitted to fulfill some of the requirements of the Order for a western perimeter groundwater investigation. Results included:
 - * 11 wells installed across the entire width of the island (along western boundary of the Navy's property) and groundwater sampled and analyzed for 18 explosive constituents; all analyzed explosives were non-detect;
 - * plus 8 additional piezometers (narrow diameter wells installed for groundwater elevation/flow information only) were installed; also
 - * 32 surface soil samples were collected and analyzed for 18 explosive constituents; all explosives were non-detect.
 - * 21 of the surface soil samples were collected at storm drains along western property line, where drainage is offsite (i.e., towards the west);
 - * 11 of the surface soil samples were at the locations of the groundwater wells.

! Based on the 1999 groundwater investigation, the Navy concluded that there are no explosive related compounds in surface soils or groundwater. EPA was not able to fully endorse that conclusion because the Navy did not submit complete data validation information with the November 1999 report. However, EPA has now received the data validation report (on September 11, 2000) and is currently reviewing it.

! On April 17, 2000, EPA issued a Deficiency letter on the Navy's March 2000 submittals. That letter requested revisions to the western perimeter [supplemental] groundwater work plan and the "Description of Current Conditions" Report, and submission of a data validation report for the 1999 groundwater data.

! On June 16, 2000, the Navy requested an extension, until September 8, 2000, to submit the revised “Description of Current Conditions” Report and Work plan for the western perimeter [supplemental] groundwater investigation. EPA approved that extension.

! As a condition of approving that extension, EPA required, and the Navy agreed to submit draft RFI Work plans for the 9 solid waste management units (SWMUs) and 3 areas of concern (AOCs) subject to the Order by September 8th, which represents an acceleration of the due date for that submittal, since under the Order, its submission was not required until 60 days following EPA’s approval of the “Description of Current Conditions Report” [which would have only been due for submission to EPA on September 8th].

! On September 8th, EPA received a revised “Description of Current Conditions” Report and Work plan for supplemental the western perimeter [baseline] groundwater investigation, and draft “Master” and site-specific RFI Work plans for the 9 SWMUs and 3 AOCs subject to the Order. EPA is currently reviewing those documents.

“Range” Cleanup at AFWTF

! The RCRA Consent Order covers SWMUs and AOCs on the eastern end of the Island that are not located within active military “range” areas.

! Cleanup for the OB/OD areas, as well as any other SWMUs and/or AOCs, located within the active military “range” (Live Impact Area) will be addressed in the RCRA permit, when issued, or during range closure, whichever occurs first.

! If no RCRA Permit is issued, the 3008(h) Consent Order would remain in effect, and could be modified to address clean-up of the “range” areas, or other Federal clean-up authorities (such as RCRA closure and post-closure requirements and/or “Superfund”) would be applicable to the “range” areas.