

FINDING OF SUITABILITY TO TRANSFER

**PARCEL 18
(SOUTH DELICIAS HILL)**

**NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO**



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August 2010

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PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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1.0 PURPOSE

This Finding of Suitability to Transfer (FOST) summarizes how the requirements and notifications for hazardous substances, petroleum products and other regulated material on the property have been satisfied, and documents my determination, as the responsible Department of Defense (DoD) component official, that certain real property and associated improvements known as the South Delicias Hill Parcel or Parcel 18 (Subject Property) at Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico are environmentally suitable for deed transfer. This decision is based primarily on my review of information contained in two of the documents listed in Exhibit A (References) – CERFA Identification of Uncontaminated Property, Former Naval Station Roosevelt Roads, Puerto Rico (the CERFA Report; Navy, 2006a) and Phase I/II Environmental Condition of Property Report, Former Naval Station Roosevelt Roads, Ceiba, Puerto Rico (the ECP Report; Navy, 2005). Factors leading to this decision and other pertinent information related to property transfer requirements are stated below.

2.0 DESCRIPTION OF PROPERTY

NAPR was formerly known as Naval Station Roosevelt Roads (NSRR) until it ceased operation as an active Naval Station on March 31, 2004, at which point it was designated Naval Activity Puerto Rico. NAPR is located on the east coast of Puerto Rico adjacent to the municipality of Ceiba.

The Subject Property is comprised of 30.433 acres located in the southwest section of the installation, and includes 13 numbered buildings and structures primarily associated with the former Atlantic Fleet Weapons Range and former Atlantic Fleet Weapons Training Facility. Exhibit B is a vicinity map showing the location of the Subject Property and Exhibit C is a parcel map from the Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico (GMI, 2005). A survey map of Parcel 18 is provided as Exhibit D.

Table 1 (Exhibit E) lists the facility number, former user, name or description, area and year of construction of each of the numbered buildings, structures, and facilities on the Subject Property.

3.0 PAST USE AND PROPOSED REUSE

The former NSRR has been used as a military installation since its acquisition and development by the Navy in the 1940s. The ECP Report states that most of the arable land on the installation was previously used for sugar cane cultivation and cattle grazing. No significant industrial

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facilities or environmental concerns were identified with respect to activities conducted on the former NSRR prior to Navy ownership. The buildings on the Subject Property were constructed between 1957 and 1989 and were used for administrative purposes.

The Navy established NAPR to serve as the caretaker of the real property associated with NSRR and to assist in the transfer of the property. Since the establishment of NAPR, all industrial and commercial operations on the Subject Property with a significant potential for environmental contamination have ceased.

A Federal-to-Federal transfer to the Department of Homeland Security (DHS) was originally planned for Parcel 18. DHS has since indicated it no longer intends to accept the property. Therefore, the Subject Property will become part of Sale Parcel I – Bundy which will be sold via public auction to the highest qualified bidder. The Naval Station Roosevelt Roads Reuse Plan (CBRE et al, 2004) developed by the Puerto Rico Department of Economic Development and Commerce [acting as the Local Redevelopment Authority (LRA)] anticipates the following types of land uses for Sale Parcel I: Moderate Lodging, Residential, Learning and Training Center, Public Golf Course, Mixed Use (commercial), University Campus and Public School. An April 2010 addendum to the Reuse Plan (CCS, 2010) included similar proposed uses for the Sale Parcel I area.

4.0 ENVIRONMENTAL FINDINGS

All available information concerning the past storage, release, or disposal of hazardous substances and/or petroleum products on NAPR, as collected through record searches, aerial photographs, personnel interviews, and on-site visual inspections, is contained in the ECP Report. The following summarizes the findings as they relate to the Subject Property and the corresponding Condition of Property Classification assigned to the real property to be transferred.

A. Hazardous Substance Contamination

There is nothing in the records that indicates any hazardous substance has been released or disposed of on the Subject Property. The ECP Report lists a former satellite accumulation area for hazardous and non-regulated wastes associated with Building 1817 (Communications Operations Building) that was no longer in use at the time of the ECP inspection. Solid Waste Management Unit (SWMU) 47 consists of undefined “satellite disposal areas” across the entire installation. A No Further Action determination was made for SWMU 47 in the 1994 Resource

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Conservation and Recovery Act (RCRA) Part B Permit for NSRR, thus a RCRA Facility Investigation (RFI) was not required (Navy, 2005). Also, the U.S. Environmental Protection Agency (EPA) Administrative Order on Consent (EPA, 2007) that replaced the permit and sets out the Navy's corrective action obligations under RCRA designated SWMU 47 as Corrective Action Completed without Controls and required no further action.

B. Petroleum Contamination

According to the ECP Report, there was one underground storage tank (UST) on the Subject Property at the time of the ECP inspection in March 2005. As shown on Table 2 in Exhibit E, it was installed in 1997 and contained diesel fuel. The ECP Report listed two known former USTs on the Subject Property that were removed in 1996 and 1997. Table 2 lists the known past and present USTs on the Subject Property along with their location, capacity, material stored and the year removed (or year installed if still present). The ECP Report and field verification documented three operational aboveground storage tanks (ASTs) and no oil/water separators on the Subject Property. These ASTs are also listed in Table 2.

According to the ECP Report, any contaminated soils identified during past replacement of tanks were excavated and disposed of off NSRR property, and the replaced tanks were closed in accordance with Title 40 Code of Federal Regulations Part 280. The records do not indicate there have been any spills or releases associated with the USTs and ASTs on the Subject Property.

C. Condition of Property Classification

The ECP Report divided all property at NAPR into parcels, and classified them into one of the three following categories:

- **Category 1** – Areas where no known or documented releases, or disposal of hazardous substances or petroleum products or their derivatives has occurred, including no migration of these substances from adjacent areas.
- **Category 2** – Areas where the release, disposal, or migration, or some combination thereof, of hazardous substances, or petroleum products or their derivatives has occurred, but at concentrations that do not require a removal or remedial action, or all remedial actions necessary to protect human health and the environment have been taken.
- **Category 3** – Areas where a confirmed or suspected release, disposal, or migration, or some combination thereof, of hazardous substances, or petroleum products or their

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derivatives has occurred, but required investigation and/or response actions have not yet been initiated or are ongoing.

These categories are derived from the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Community Environmental Response Facilitation Act (CERFA) and the American Society for Testing and Materials (ASTM) Standard Practice for Conducting Environmental Baseline Surveys (ASTM Standard D 6008-96), which further incorporates ASTM D 5746-98 (2002) Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities.

CERFA stipulates that the federal government must identify “uncontaminated property” scheduled for transfer, and defines this as “...real property on which no hazardous substances and no petroleum products or their derivatives were known to have been released, or disposed of” [(Section 9620(h)(4)(A)]. In accordance with the property condition classification guidelines discussed above, the Subject Property is suitable for deed transfer and is classified as Category 1 (uncontaminated). Following its review of the CERFA Report, the Puerto Rico Environmental Quality Board (EQB) concurred with this classification and provided a concurrence statement (Exhibit F) in the Final CERFA Report on 11 August 2006.

D. Other Environmental Aspects

1. Munitions and Explosives of Concern

According to the ECP Report, there are no heavy (crew-served) weapon ranges, unexploded ordnance/impact areas, explosive ordnance disposal areas or open burning/open detonation activities on the Subject Property.

2. Asbestos-Containing Materials

According to the June 2005 Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico (Baker, 2005), asbestos-containing material (ACM) was identified in 7 of 11 facilities inspected on the Subject Property, as summarized in Table 3 of Exhibit E. Friable, accessible, and damaged (FAD) ACM was not identified at any of the facilities. Additional samples were collected at Building 663 (G.E./Contractor Admin) on August 11, 2010 when extensive roof damage was discovered. The roofing material was determined to be damaged and accessible ACM, but not friable (Baker, 2010). Detailed information about the materials identified and sampled during the asbestos

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inspections, including summary tables, location drawings, photographs and laboratory reports, is included in the reports.

The possibility remains for the presence of undiscovered ACM associated with underground utilities and miscellaneous building materials at NAPR. While this potential ACM does not pose a hazard to site users, future demolition and/or subsurface work performed by the transferee could result in FAD ACM hazards. Thus, the transferee must comply with all applicable Commonwealth and Federal laws relating to ACM management in order to ensure future protection of human health and the environment during any future renovation/demolition activities or underground utility work. An ACM Hazard Disclosure and Acknowledgment Form (Exhibit G) will be provided to the transferee for execution at the time of transfer.

3. Lead-Based Paint

A lead-based paint (LBP) survey and risk assessment was completed at NAPR in 2005 and updated in 2009 for military family housing only, thus none of the facilities on the Subject Property were included in the survey.

Table 1 (Exhibit E) indicates approximately seven of the buildings, structures and facilities on the Subject Property were constructed in or before 1978, the year in which LBP was banned for consumer use. These facilities and any others built before 1978 are presumed to contain LBP. A Lead-Based Paint Hazard Disclosure and Acknowledgment Form, Exhibit H to this FOST, will be provided to the transferee as an attachment to the deed and executed at the time of transfer.

4. Polychlorinated Biphenyls

Only one polychlorinated biphenyl (PCB) transformer (> 500 parts per million) remains at NAPR. The transformer, located in the basement of Building 386, is on the Subject Property. The NAPR Base Operating Support contractor visually inspects the transformer weekly for leaks and completes a monthly checklist. The transformer is currently (August 2010) in a normal condition. The new owner will be responsible for operating and maintaining the transformer, for the eventual disposal of PCBs at the end of the transformer's useful life, and for complying with all applicable federal and state PCB regulations.

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Due to the age of the majority of facilities and the size of the station, it is possible that PCB-contaminated (5 to 500 parts per million) fluorescent light ballasts and other minor PCB sources may be present on NAPR. There are no other records of PCBs having been stored, released or disposed of on the Subject Property.

5. Radon

According to the U.S. Geological Survey (USGS) Open-File Report 93-292-K, Preliminary Geologic Radon Potential Assessment of Puerto Rico (1993), the Commonwealth of Puerto Rico exhibits generally low indoor radon levels, and a survey of radon concentrations of offices, housing units, schools and other buildings was conducted by the DoD between 1989 and 1992 on federal military reservations in Puerto Rico, including the former NSRR. Indoor radon levels ranged from 0.0 to 1.9 picoCuries/Liter (pCi/L), well below the current EPA residential indoor radon screening action level of 4 pCi/L. The majority of the reservations, including NAPR, are situated on coastal plains, so the low indoor radon levels were not unexpected.

6. Threatened and Endangered Species

As shown on the individual parcel map in Exhibit C, breeding habitat for the endangered yellow-shouldered blackbird has been identified on the Subject Property. The Commonwealth of Puerto Rico has indicated that it intends to zone the property in a manner that will implement the planning, development, maintenance, mitigation and use requirements described on the parcel map.

In accordance with the Endangered Species Act, the Navy developed a Biological Assessment (BA) for the former NSRR in 2006 to assess the potential impact on any federally protected species from the disposal of NSRR. Given the protection measures addressed in detail in the Biological Assessment for the Disposal of Naval Station Roosevelt Roads/Naval Activity Puerto Rico Final Report (Navy, 2006b), the Navy has determined that the disposal of the former NSRR and transfer of the property to future owners is not likely to adversely affect federally-listed species and would not result in adverse modification of designated critical habitat within the project area. The U.S. Fish and Wildlife Service concurred with this determination in a letter dated April 7, 2006.

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5.0 REQUIREMENTS APPLICABLE TO PROPERTY TRANSFER

A. NEPA Compliance

In accordance with National Environmental Policy Act (NEPA) requirements, an Environmental Assessment and Finding of No Significant Impact (FONSI) have been prepared and executed in connection with the planned disposal and reuse of NAPR. The FONSI was signed on April 10, 2007.

B. Hazardous Substance Notice

In accordance with Section 120(h)(3)(A)(i) of CERCLA, all deeds transferring federal property must provide notice as to those hazardous substances which it is known, based on a complete search of agency files, were stored for one year or more, released or disposed on the Subject Property in excess of those reportable quantities specified under Title 40 CFR Part 373, and all response actions taken to date to address any such releases or disposals. No hazardous substances are known to have been stored or released on the Subject Property in excess of their respective reportable quantities, thus, no deed notice is required in this instance.

C. CERCLA Covenant

In accordance with CERCLA Section 120(h)(4)(D)(i), the deed transferring the Subject Property shall contain a covenant warranting that any response action or corrective action found to be necessary after the date of transfer shall be conducted by the United States.

D. CERCLA Access Clause

In accordance with CERCLA Section 120(h)(4)(D)(ii), the deed transferring the Subject Property shall contain a clause granting to the United States, its officers, agents, employees, contractors, and subcontractors the right to enter upon the transferred property in any case that remedial or corrective action is found to be necessary after the date of transfer. The right to enter to be set forth shall include the right to conduct annual physical inspections, tests, investigations, long term monitoring, 5-year reviews, and surveys, including, where necessary, drilling, test pitting, boring, and other similar activities. Such right shall also include the right to construct, operate, maintain, or undertake any other response or remedial action as required or necessary, including, but not limited to, monitoring wells, pumping wells, and treatment facilities. The United States retains the authority to enter to conduct investigations on adjacent parcels as well as the parcel subject to

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the transfer. These access rights are in addition to those granted to Federal, state, and local authorities under applicable environmental laws and regulations.

E. Land and Groundwater Restrictions

The Navy will transfer all of the Subject Property without restrictions.

F. Environmental Compliance Agreements / Permits / Orders

On January 29, 2007, the U.S. Department of the Navy and EPA voluntarily entered into a RCRA Section 7003 Administrative Order on Consent (Consent Order; EPA, 2007). The Consent Order set out the Navy's RCRA corrective action obligations and replaced the 1994 RCRA permit as the document memorializing these obligations concerning NAPR. The former satellite accumulation area for hazardous and non-regulated wastes associated with Building 1817 is included in SWMU 47 (miscellaneous satellite "disposal" areas). A No Further Action determination was made for SWMU 47 and no RFI was required under the 1994 permit. Furthermore, SWMU 47 was designated as Corrective Action Completed without Controls under the Consent Order. However, certain RCRA obligations defined in the Consent Order apply to the Subject Property including notification and additional work requirements for newly discovered releases, other notification requirements, and record retention requirements.

G. Notification to Regulatory Agencies / Public

In accordance with DoD guidance, EPA Region 2 and the Puerto Rico EQB have been advised of the proposed transfer of the Subject Property, and copies of the ECP Report, CERFA Report, and Draft FOST were provided to those agencies for review and comment. Navy responses to EPA and EQB review comments on the draft version of this FOST are provided in Exhibit I. The ECP Report was made available for public review upon finalization. Copies of all transfer documentation will be made available to EPA and EQB representatives upon request after execution of the same.

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6.0 SUITABILITY DETERMINATION

NOW THEREFORE, based on my review of the information contained in this FOST and in the ECP and CERFA Reports, I have determined that the Subject Property is presently suitable for deed transfer for unrestricted use.

7 SEPTEMBER 2010
Date



JAMES E. ANDERSON
Director
BRAC Program Management Office Southeast
North Charleston, South Carolina

Exhibit A
References

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REFERENCES

Baker (Michael Baker Corporation), 2005. "Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico". Moon Township, Pennsylvania.

Baker, 2010. "Asbestos Inspection Report, Building 663, Naval Activity Puerto Rico, Ceiba, Puerto Rico". Moon Township, Pennsylvania.

CBRE et al (CB Richard Ellis Consulting, Cooper Robertson & Partners, Moffatt & Nichol, Puerto Rico Management & Economic Consultants, Inc.), 2004. "Naval Station Roosevelt Roads Reuse Plan".

CCS (Chicago Consultants Studio, Inc.), 2010. "Roosevelt Roads Redevelopment, Addendum to the 2004 Reuse Plan."

EPA (U.S. Environmental Protection Agency), 2007. "RCRA § 7003 Administrative Order on Consent, In the Matter of United States, The Department of the Navy, Naval Activity Puerto Rico, formerly Naval Station Roosevelt Roads, Puerto Rico". EPA Docket No. RCRA-02-2007-7301.

GMI (Geo-Marine, Inc.), 2005. "Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico". Hampton, Virginia.

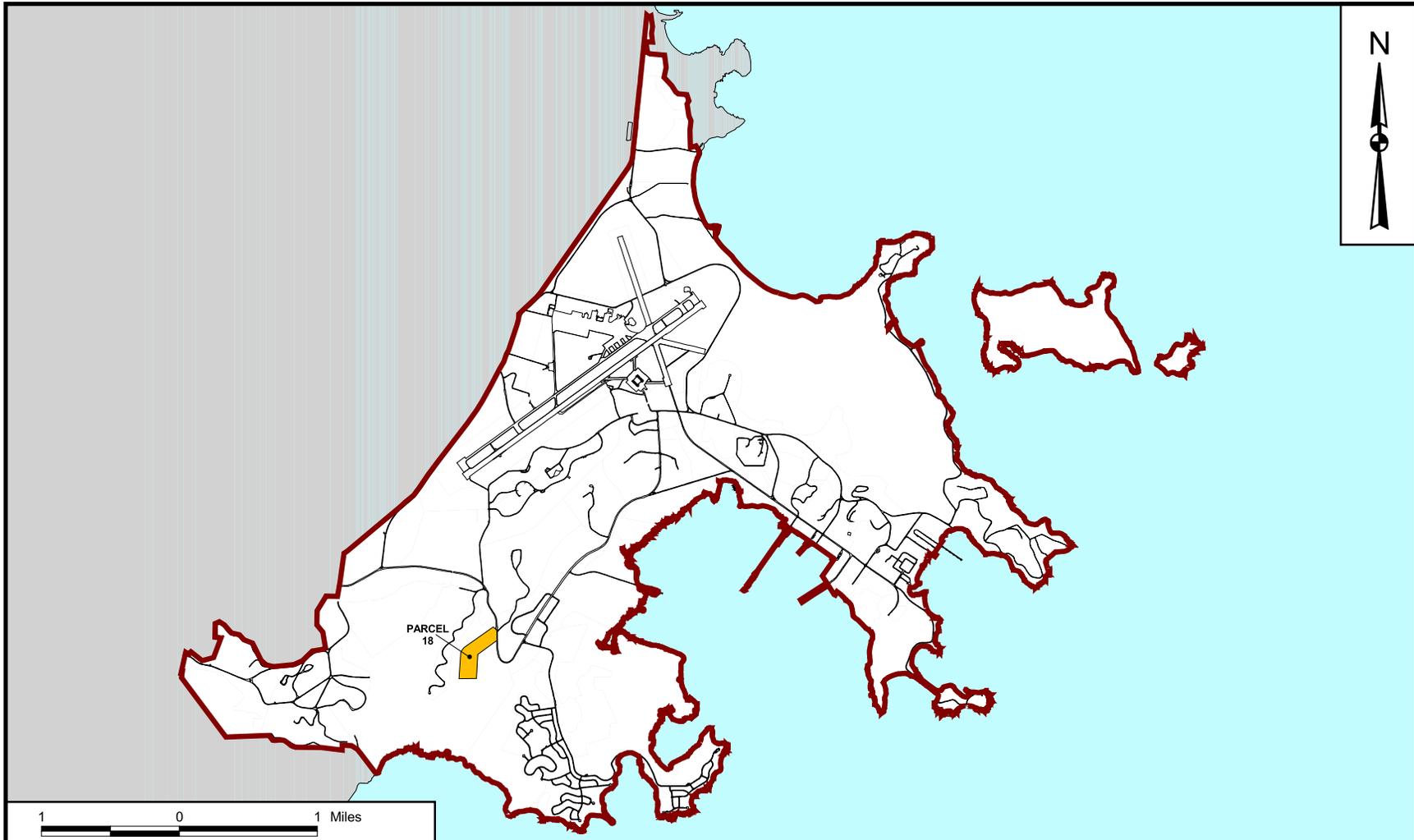
Navy (Naval Facilities Engineering Command Atlantic), 2005. "Phase I/II Environmental Condition of Property Report, Former U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico". Norfolk, Virginia.

Navy (Department of the Navy, Base Realignment and Closure Program Management Office Southeast), 2006a. "CERFA Identification of Uncontaminated Property, Former Naval Station Roosevelt Roads, Puerto Rico". North Charleston, South Carolina.

Navy (Naval Facilities Engineering Command Atlantic), 2006b. "Biological Assessment for the Disposal of Naval Station Roosevelt Roads/Naval Activity Puerto Rico Final Report". Norfolk, Virginia.

USGS (U.S. Geological Survey), 1993. Open File Report 93-292-K, "Preliminary Geologic Radon Potential Assessment of Puerto Rico".

Exhibit B
Vicinity Map



DRAWN BY	DATE
S. STROZ	11/16/09
CHECKED BY	DATE
L. ANDERSON	11/16/09
COST/SCHEDULE-AREA	
SCALE AS NOTED	



PARCEL 18
(SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO

CONTRACT NUMBER 0043	
APPROVED BY	DATE
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APPROVED BY	DATE
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DRAWING NO.	REV
---	0

Exhibit C

Parcel Map

THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 18

**Common Name—Federal
Conveyance—Fed
Neighboring Parcel(s)—5, 25**

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- All applicable federal laws (e.g., Endangered Species Act, National Environmental Policy Act, and Clean Water Act) remain in effect.
- Consult with the U.S. Fish and Wildlife Service regarding any development plans.
- Pesticide and herbicide applications must follow Commonwealth of Puerto Rico regulations.

Activity	Conservation Measures
Development Planning	Save as many existing on site palms and trees as possible in new development plans.
New Construction/Clearing	If undeveloped yellow-shouldered blackbird habitat is proposed for clearing consult with USFWS a minimum of one year prior to planned project initiation.
Demolition/Remodeling	Schedule activity from September 1 through March 14 or conduct outdoor survey of building(s) (ledges, etc.) and nearby trees (within 50 m of the building) for yellow-shouldered blackbird nests prior to start date if the development activity is scheduled to occur between March 15 and August 30. Consult with USFWS if a yellow-shouldered blackbird nest is found.
Grounds Maintenance	No trimming or cutting of palms and trees between March 15 and August 30 except in an emergency (i.e., downed trees and palms from storms).
Building Maintenance	Check for yellow-shouldered blackbird nests prior to any outdoor building maintenance activities between March 15 and August 30. Determine identity of any bird nest found. Notify and consult with USFWS if a yellow-shouldered blackbird nest is found.
General Operations	Before moving parked outdoor equipment (e.g., carts, vehicles) check for yellow-shouldered blackbird nests (March 15-August 30). Notify USFWS if a yellow-shouldered blackbird nest is located.

NOTICE:

Consult with the U.S. Fish and Wildlife Service if you have any questions on the conservation measures. Property owners that cannot adhere to the conservation measures must consult with the U.S. Fish and Wildlife Service to seek a Section 10.0 permit for authorization to modify the identified critical habitat. Failure to comply with the identified conservation measures violates Section 9.0 and/or Section 10.0 of the Endangered Species Act. The U.S. Fish and Wildlife Service has the authority to prosecute violations under the Endangered Species Act.

Parcel Index 18

Common Name: Federal
Conveyance: Fed
Neighboring Parcel(s): 5, 25

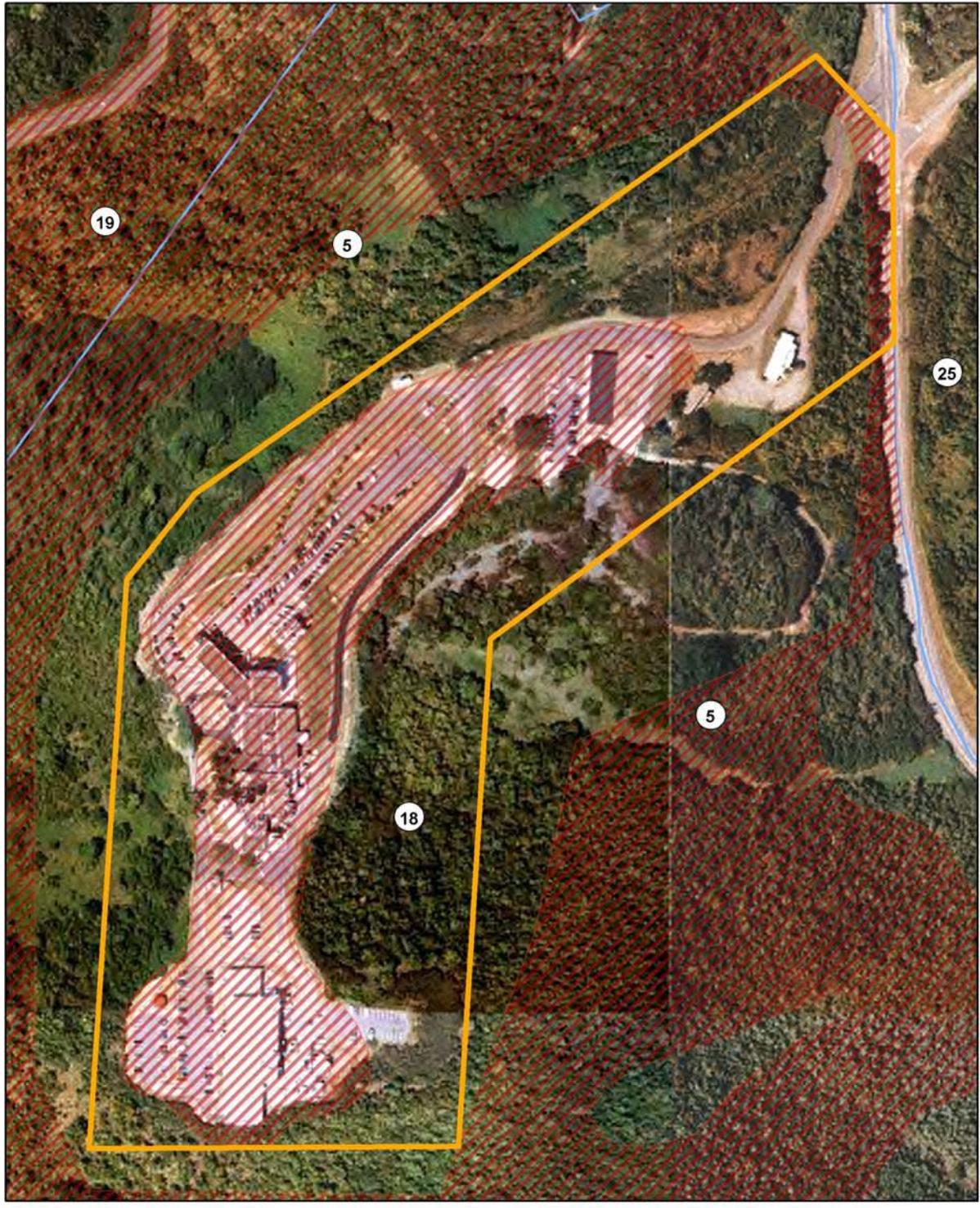
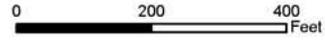
Legend

-  Parcel
-  Neighboring Parcel Boundaries
- Yellow-shouldered Blackbird**
-  Nesting/Foraging Palms
-  Breeding Habitat

August 18, 2005



1 inch equals 248 Feet



Parcel Index 18

Common Name: Federal
Conveyance: Fed
Neighboring Parcel(s): 5, 25

Legend

- Parcel
- Neighboring Parcel Boundaries
- Cleanup Status
 - Complete with Land Use Controls
 - Complete
 - Cleanup Remaining

August 18, 2005



1 inch equals 248 Feet

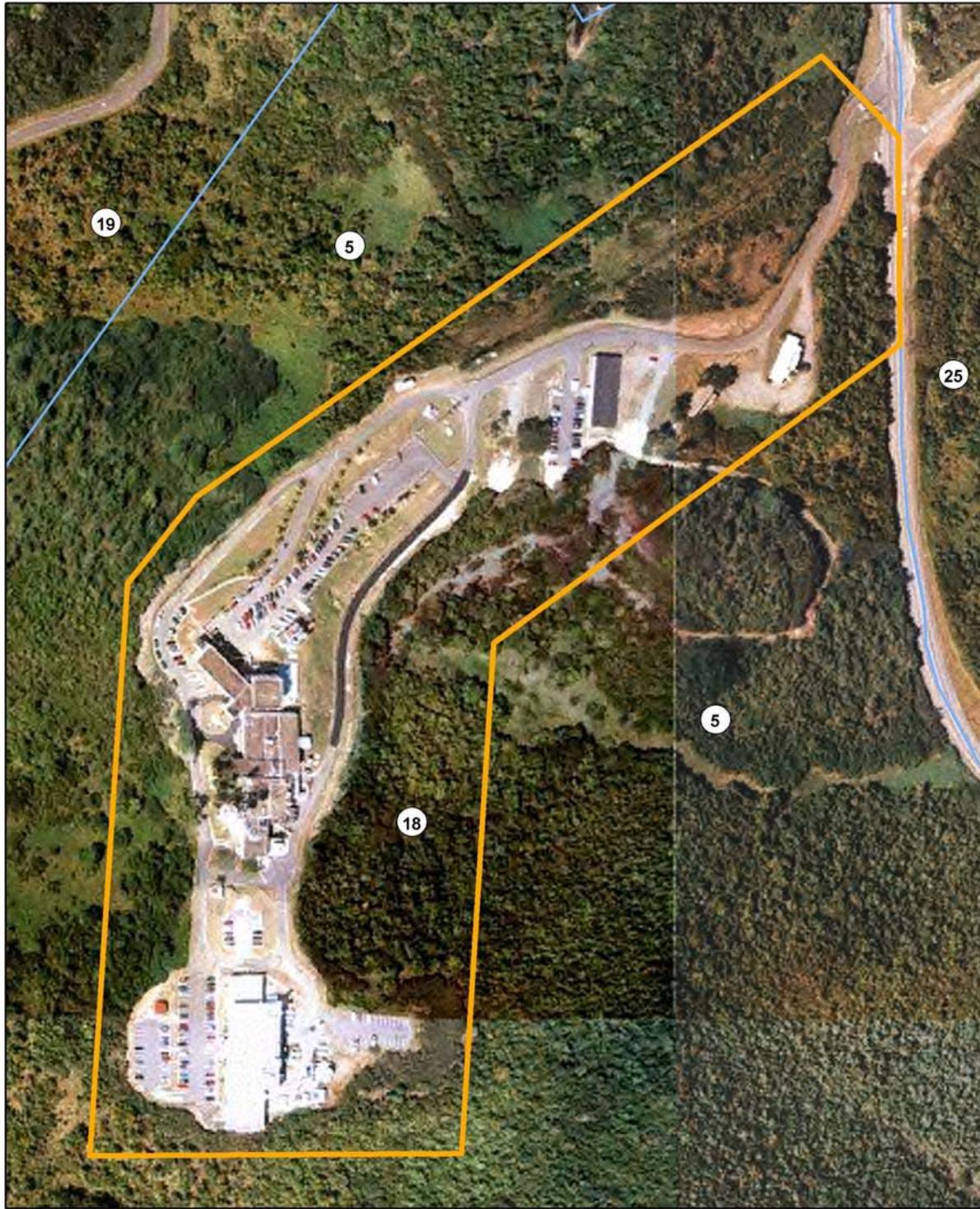
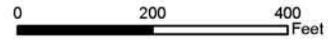


Exhibit D
Survey Map

Exhibit E

Tables

Table 1
Naval Activity Puerto Rico
Parcel 18 (South Delicias Hill) FOST
Facilities List

Facility #	Former User	Name	Area	Unit	Yr Built
386	AFWTF	AFWR HEADQUARTERS	46318	SF	1962
663	AFWTF	G.E./CONTRACTOR ADMIN	2886	SF	1957
664	AFWTF	ROC SUPPORT BLDG	2450	SF	1957
771	AFWTF	FIRE PROTECTION WTR TK BY B386	1984	-	1963
1817	NAVCOMTELSTA	COMM OPERATIONS BUILDING	35783	SF	1978
1922	PWD	POTABLE WTR DISTRIBUTION BLDG	144	SF	1978
1926	-	AFWTF MISSILE DISPLAY	15	SY	1977
2014	AFWTF	EMERG GEN BLDG BY B386	416	SF	1981
2207	MWR	BUS SHLTER S.DELICIAS	140	SF	1987
2248	AFWTF	UPS SHLTR FOR B386	364	SF	1986
2278	AFWTF	AFWTF (OFFICE ANNEX) B386	4987	SF	1988
2293	AFWTF	ROC UTILITY BLDG	1472	SF	1989
2296	AFWTF	ADMINISTRATIVE BLDG AFWTF	22011	SF	1989

List based on 2003 NAPR base map (Base map - PREnew 11-2003.pdf), July 2001 Building Utilization List, List of Buildings To Be Inspected For Asbestos from June 2005 Asbestos Inspection Report, and field verification by NAPR personnel.

- Information not available or unknown

AFWR	Atlantic Fleet Weapons Range
AFWTF	Atlantic Fleet Weapons Training Facility
MWR	Morale, Welfare and Recreation
NAVCOMTELSTA	Naval Computer and Telecommunications Station
PWD	Public Works Department
ROC	Range Operations Center
UPS	Uninterrupted Power Supply

Table 2
Naval Activity Puerto Rico
Parcel 18 (South Delicias Hill) FOST
AST and UST List

Number	Type	Location or User	Capacity	Material Stored	Year Installed	Year Removed
1817A	AST	PWD	5000	Diesel	-	-
1817B	AST	PWD	5000	Diesel	-	-
2248	AST	AFWTF	5000	Diesel	-	-
2293	UST	ROC Mechanical Bldg, South Delicias	4000	Diesel	1997	NA
386A	Former UST	Building 2248	550	Waste Oil	-	1996
1817	Former UST	Building 1817	18000	Diesel	-	1997

- Information not available or unknown

AFWTF	Atlantic Fleet Weapons Training Facility
AST	Aboveground Storage Tank
NA	Not Applicable
PWD	Public Works Department
ROC	Range Operations Center
UST	Underground Storage Tank

Table 3
Naval Activity Puerto Rico
Parcel 18 (South Delicias Hill) FOST
Asbestos-Containing Material Inspection Results

Facility #	Name	ACM Identified	Comments
386	AFWR HEADQUARTERS	Y	
663	G.E./CONTRACTOR ADMIN	Y	Potential FAD ACM identified in damaged roof was tested and found to be non-friable.
664	ROC SUPPORT BLDG	Y	
771	FIRE PROTECTION WTR TK BY B386	NI	
1817	COMM OPERATIONS BUILDING	Y	
1922	POTABLE WTR DISTRIBUTION BLDG	N	
1926	AFWTF MISSILE DISPLAY	NI	
2014	EMERG GEN BLDG BY B386	N	
2207	BUS SHLTER S.DELICIAS	N	
2248	UPS SHLTR FOR B386	Y	
2278	AFWTF (OFFICE ANNEX) B386	Y	
2293	ROC UTILITY BLDG	N	
2296	ADMINISTRATIVE BLDG AFWTF	Y	

Notes: Y = Yes
N = No
NI = Not Inspected
Hazard = friable, accessible and damaged asbestos

ACM Asbestos Containing Material
AFWR Atlantic Fleet Weapons Range
AFWTF Atlantic Fleet Weapons Training Facility
ROC Range Operations Center
UPS Uninterrupted Power Supply

Sources: Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico (Baker, June 2005)

Asbestos Inspection Report, Building 663, Naval Activity Puerto Rico, Ceiba, Puerto Rico (Baker, 2010)

Exhibit F
CERFA Concurrence

**CERFA Identification of Uncontaminated Property
Former Naval Station Roosevelt Roads, Puerto Rico**

Accordingly, this CERFA Uncontaminated Property Report reflects final site categorizations that may differ from those presented in the Final ECP report.

In summary, all NAPR property not otherwise identified as sites belonging to Categories 2 or 3 are classified as "CERFA Clean" (i.e. uncontaminated) as defined in CERFA [§9620 (h)(4)(A)]. The bulk of the NAPR acreage is classified as such. Of the approximately 8,400 acres of NSRR property, about 7,000 acres have been identified as "CERFA Clean" (i.e., Category 1). Figure 1 depicts the results of this classification.

Included in the CERFA Clean classification are a total of 14 SWMUs. Ten of these SWMUs were identified by EPA in the 1994 RCRA Part B permit, and an additional four sites were identified by the ECP. All 14 of these sites were originally identified based on a suspected release or disposal activity, but subsequent investigations determined that no release or disposal activity occurred. EPA has indicated their concurrence with this determination in the draft §7003 Order on Consent by designating each of these sites as having achieved "corrective action complete without controls" designation. The SWMUs and ECP sites designated as CERFA Clean are SWMUs 5, 15, 20, 21, 22, 47, 48, 49, 50, 52, 63 (ECP 9), 64 (ECP 10), 65 (ECP 11), and 66 (ECP 12). These sites are presented in Table 1.

The remaining property has been classified as Category 2 or 3 and as such is not qualified for designation as CERFA Clean.

Submitted

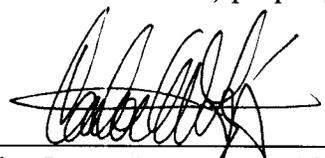


R. DAVID CRISWELL, P. E.
BRAC Environmental Coordinator

4/27/06
Date

Concurrence

Concurrence with CERFA Identification of Uncontaminated Property is indicated by signature below. This concurrence applies only to the identification of "CERFA Clean" (i.e. uncontaminated) property, identified in this document as ECP Category 1.



Carlos Lopez Freytes, President
Environmental Quality Board
Commonwealth of Puerto Rico

8/11/06
Date

Exhibit G

**Asbestos-Containing Materials Hazard Disclosure
and Acknowledgment Form**

**ASBESTOS-CONTAINING MATERIALS
HAZARD DISCLOSURE AND ACKNOWLEDGMENT FORM
(NON-RESIDENTIAL STRUCTURES)**

ASBESTOS WARNING STATEMENT

YOU ARE ADVISED THAT CERTAIN BUILDINGS WITHIN THE SOUTH DELICIAS HILL PARCEL (AKA PARCEL 18) AT THE FORMER NAVAL STATION ROOSEVELT ROADS HAVE ASBESTOS-CONTAINING MATERIALS PRESENT. INDIVIDUALS (WORKERS) MAY SUFFER ADVERSE HEALTH EFFECTS AS A RESULT OF INHALATION EXPOSURE TO ASBESTOS. THESE ADVERSE HEALTH EFFECTS INCLUDE ASBESTOSIS (PULMONARY FIBROSIS) AND MESOTHELIOMAS (BENIGN OR MALIGNANT TUMORS).

ACKNOWLEDGMENT

I acknowledge that:

- (1) I have read and understand the above-stated Asbestos Warning Statement.
- (2) I have received from the Government the following document(s): *Phase I/II Environmental Condition of Property Report, Former Naval Station Roosevelt Roads, Ceiba, Puerto Rico*, the *Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico*, the *Asbestos Inspection Report, Building 663, Naval Activity Puerto Rico*, and the *Finding of Suitability to Transfer, Parcel 18 (South Delicias Hill), Naval Activity Puerto Rico, Ceiba, Puerto Rico* representing the best information available to the Government as to the presence of and condition of asbestos-containing-materials hazards in the building covered by this Transfer.
- (3) I understand that my failure to inspect or to become fully informed of the condition of all or any portion of the property offered will not constitute grounds for any claim or demand for adjustment or withdrawal of any bid or offer made after its opening or tender.
- (4) I understand that, upon execution of this Transfer, I shall assume full responsibility for preventing future asbestos exposure by properly managing and maintaining or, as required by applicable federal, State, or local laws or regulations, for abating any asbestos hazard that may pose a risk to human health.

Transferee (or duly authorized agent)

Date

Exhibit H

**Lead-Based Paint Hazard Disclosure
and Acknowledgment Form**

**LEAD-BASED PAINT HAZARD
DISCLOSURE AND ACKNOWLEDGMENT FORM
(NON-RESIDENTIAL STRUCTURES)**

LEAD WARNING STATEMENT

YOU ARE ADVISED THAT STRUCTURES CONSTRUCTED PRIOR TO 1978 MAY PRESENT EXPOSURE TO LEAD FROM LEAD-BASED PAINT THAT MAY PLACE YOUNG CHILDREN AT RISK OF DEVELOPING LEAD POISONING. LEAD POISONING IN YOUNG CHILDREN MAY PRODUCE PERMANENT NEUROLOGICAL DAMAGE. YOU ARE FURTHER ADVISED THAT LEAD POISONING ALSO POSES A PARTICULAR RISK TO PREGNANT WOMEN. WORKERS MAY ALSO SUFFER ADVERSE HEALTH EFFECTS FROM LEAD DUST AND FUME EXPOSURE

ACKNOWLEDGMENT

I acknowledge that:

(1) I have read and understand the above-stated Lead Warning Statement;

(2) I have received from the Federal Government the following document(s): *Phase I/II Environmental Condition of Property Report, Former Naval Station Roosevelt Roads, Ceiba, Puerto Rico* and the *Finding of Suitability to Transfer, Parcel 18 (South Delicias Hill), Naval Activity Puerto Rico, Ceiba, Puerto Rico* representing the best information available to the Government as to the presence of Lead-Based Paint and Lead-Based Paint hazards for the buildings covered by this Transfer;

(3) I understand that my failure to inspect, or to become fully informed as to the condition of all or any portion of the property offered will not constitute grounds for any claim or demand for adjustment or withdrawal of any bid or offer made after its opening or tender; and

(4) I understand that upon execution of this Transfer, I shall assume full responsibility for preventing future lead exposure by properly managing and maintaining or, as required by applicable Federal, state, or local laws or regulations, for abating any lead-based paint hazard that may pose a risk to human health.

Transferee (or duly authorized agent)

Date

Exhibit I
Responses to Comments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUL 15 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark E. Davidson
US Navy
BRAC PMO SE
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,
EPA I.D. Number PRD2170027203, Draft Fining of Suitability to Transfer (FOST)
Parcel 18 (South Delicias Hill)

Dear Mr. Davidson:

This letter is addressed to you as the Navy's designated project coordinator pursuant to the January 29, 2007 RCRA Administrative Order on Consent ("the Consent Order") between the United States Environmental Protection Agency (EPA) and the U.S. Navy (the Navy).

EPA has completed its review of the Draft Fining of Suitability to Transfer (FOST) Parcel 18 (South Delicias Hill), transmitted to EPA and the Puerto Rico Environmental Quality Board (EQB) on behalf of the Navy, by Robert F. Simcik's (of Tetra Tech NUS Inc.) letter of May 26, 2010.

EPA has the following comments on the Draft FOST:

1) Section D.4 (Polychlorinated Biphenyls) on page 5 indicates that the only PCB transformer remaining at the NAPR facility is located in Building 386, which is within the Subject Property, i.e., Parcel 18. The Section further states that "The transformer is checked monthly by a station contractor for possible leaks, and was reported to be in normal condition as of November 13, 2009." Please update that Section of the FOST to discuss: 1) the condition of the transformer as of the most recent inspection subsequent to November 2009; 2) who will be responsible for continuing to inspect and maintain the transformer following the Parcel 18 transfer; and 3) who will be responsible for assuring proper, i.e. in compliance with 40 CFR Part 761 requirements, disposal of that transformer and the associated PCB fluids following the Parcel 18 transfer.

2) The statement in Section F (Environmental Compliance Agreements/Permits/Orders) on page 8 that "Although there are no RCRA solid waste units or areas of concern on the Subject Property...." is not completely accurate and should be revised. The former satellite accumulation area for hazardous and non-regulated wastes associated with Building 1817, which is discussed in Section 4.0 A (Hazardous Substance Contamination), should have been included under solid waste management unit (SWMU) 47 (miscellaneous "satellite" disposal areas). As discussed in the 1988 RCRA Facility Assessment (RFA) prepared on behalf of EPA, SWMU 47 included satellite waste accumulation areas throughout the facility. Since under the 2007 RCRA Consent Order, SWMU 47 was determined to require No Further Action, the FOST should be revised to indicate both that the former satellite accumulation area for hazardous and non-regulated wastes associated with Building 1817 would have been included under SWMU 47, and that a Corrective Action Complete determination was made for that SWMU under the 2007 Consent Order.

Please revise the Draft FOST to addresses the above comments, and submit two copies of the Final FOST to EPA. If you have any questions, please telephone me at (212) 637- 4167.

Sincerely yours,



Timothy R. Gordon
Project Coordinator
Resource Conservation and Special Projects Section
RCRA Programs Branch

cc: Ms. Wilmarie Rivera, P.R. Environmental Quality Board
Mr. David Criswell, U.S. Navy, BRAC
Mr. Robert F. Simcik, Tetra Tech NUS Inc.

Navy Responses to U.S. Environmental Protection Agency Comments
Draft Finding of Suitability to Transfer
Parcel 18 (South Delicias Hill)
Naval Activity Puerto Rico

1. Section D.4 (Polychlorinated Biphenyls) on page 5 indicates that the only PCB transformer remaining at the NAPR facility is located in Building 386, which is within the Subject Property, i.e., Parcel 18. The Section further states that “The transformer is checked monthly by a station contractor for possible leaks, and was reported to be in normal condition as of November 13, 2009.” Please update that Section of the FOST to discuss: 1) the condition of the transformer as of the most recent inspection subsequent to November 2009; 2) who will be responsible for continuing to inspect and maintain the transformer following the Parcel 18 transfer; and 3) who will be responsible for assuring proper, i.e. in compliance with 40 CFR Part 761 requirements, disposal of that transformer and the associated PCB fluids following the Parcel 18 transfer.

Navy Response:

Section 4.0 D.4. has been revised to state *“The NAPR Base Operating Support contractor visually inspects the transformer for leaks and completes a monthly checklist. The transformer is currently (August 2010) in a normal condition. The new owner will be responsible for operating and maintaining the transformer, for the eventual disposal of PCBs at the end of the transformer’s useful life, and for complying with all applicable federal and state PCB regulations, including any required inspections.”*

2. The statement in Section F (Environmental Compliance Agreements/Permits/Orders) on page 8 that “Although there are no RCRA solid waste units or areas of concern on the Subject Property....” is not completely accurate and should be revised. The former satellite accumulation area for hazardous and non-regulated wastes associated with Building 1817, which is discussed in Section 4.0 A (Hazardous Substance Contamination), should have been included under solid waste management unit (SWMU) 47 (miscellaneous “satellite” disposal areas). As discussed in the 1988 RCRA Facility Assessment (RFA) prepared on behalf of EPA, SWMU 47 included satellite waste accumulation areas throughout the facility. Since under the 2007 RCRA Consent Order, SWMU 47 was determined to require No Further Action, the FOST should be revised to indicate both that the former satellite accumulation area for hazardous and non-regulated wastes associated with Building 1817 would have been included under SWMU 47, and that a Corrective Action Complete determination was made for that SWMU under the 2007 Consent Order.

Navy Response:

Section 4.0 A. has been revised to state *“Solid Waste Management Unit (SWMU) 47 consists of undefined “satellite disposal areas” across the entire installation. A No Further*

Action determination was made for SWMU 47 in the 1994 Resource Conservation and Recovery Act (RCRA) Part B Permit for NSRR, thus a RCRA Facility Investigation (RFI) was not required (Navy, 2005). Also, the U.S. Environmental Protection Agency (EPA) Administrative Order on Consent (EPA, 2007) that replaced the permit and sets out the Navy's corrective action obligations under RCRA designated SWMU 47 as Corrective Action Complete without Controls and required no further action."

Section 5.0 F. has been revised to state "The former satellite accumulation area for hazardous and non-regulated wastes associated with Building 1817 is included in SWMU 47 (undefined "satellite disposal areas"). A No Further Action determination was made for SWMU 47 and no RFI was required under the 1994 permit. Furthermore, SWMU 47 was designated as Corrective Action Complete without Controls under the Consent Order. However, certain RCRA obligations defined in the Consent Order apply to the Subject Property including notification and additional work requirements for newly discovered releases, other notification requirements, and record retention requirements."



COMMONWEALTH OF PUERTO RICO
Office of the Governor
Environmental Quality Board

Environmental Emergencies Response Area

June 29, 2010

Mr. David Criswell
U.S. Navy
BRAC PMO SE
U.S. Environmental Protection Agency
4130 Faber Place Driver, Suite 202
North Charleston, SC 29405

Re: Draft Finding of Suitability to Transfer (FOST) Parcel 18 (South Delicias Hill), Naval Activity Puerto Rico, Ceiba, Puerto Rico

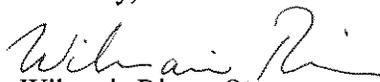
Dear Mr. Criswell:

The Puerto Rico Environmental Quality Board (PREQB) has completed its review of the Draft Finding of Suitability to Transfer (FOST) Parcel 18 (South Delicias Hill), Naval Activity Puerto Rico, dated May 2010. PREQB has the following comments on the Draft FOST:

- **Section 3.0, Past Use and Proposed Reuse, Page 2, Paragraph 2:** This paragraph refers to the Naval Station Roosevelt Roads Reuse Plan (CBRE et al, 2004) for the future land uses for Parcel 1. The Local Redevelopment Authority (LRA) has developed a new Reuse Plan for the Former Naval Station Roosevelt Roads, which was presented to the Navy. Please verify that the future uses stated in this paragraph are those stated in the current Reuse Plan.
- **Section 4.0, D, 4 (Polychlorinated Biphenyls), Page 5:** This paragraph states the transformer located in Building 386 is checked monthly by a station contractor for possible leaks, and is reported to be in normal condition as of November 13, 2009 (Navy 2009). Please clarify whether addition inspections have been conducted since November 2009 and, if not, please explain why.
- Please provide PREQB with copies of all executed transfer documents.

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

Cordially,



Wilmarie Rivera Otero

Federal Facilities Coordinator

cc: Timothy Gordon, EPA

**Navy Responses to Puerto Rico Environmental Quality Board Comments
Draft Finding of Suitability to Transfer
Parcel 18 (South Delicias Hill)
Naval Activity Puerto Rico**

1. **Section 3.0, Past Use and Proposed Reuse, Page 2, Paragraph 2:** This paragraph refers to the Naval Station Roosevelt Roads Reuse Plan (CBRE et al, 2004) for the future land uses for Parcel 1. The Local Redevelopment Authority (LRA) has developed a new Reuse Plan for the Former Naval Station Roosevelt Roads, which was presented to the Navy. Please verify that the future uses stated in the paragraph are those stated in the current Reuse Plan.

Navy Response:

The 2004 Reuse plan anticipated the following types of land uses for Sale Parcel I: Moderate Lodging, Residential, Learning and Training Center, Public Golf Course, Mixed Use (commercial), University Campus and Public School. The April 2010 Addendum to the Reuse Plan includes the following uses for Zones 6 through 9 which correspond to the Sale Parcel I area.

- Zone 6 Uplands – golf, residential, and airside commercial/industrial business park
- Zone 7 Town Center – commercial, residential, primary and secondary schools, and university
- Zone 8 Community Recreational Hub – sports and recreation, equestrian trails, golf training, lodging, retail and dining
- Zone 9 Conference and Learning Center – conference center, retail, lodging, and residential

The following sentence has been added to the end of Section 3.0 – “ *An April 2010 addendum to the Reuse Plan (CCS, 2010) included similar proposed uses for the Sale Parcel I area.*”

2. **Section 4.0, D, 4 (Polychlorinated Biphenyls), Page 5:** This paragraph states the transformer located in Building 386 is checked monthly by a station contractor for possible leaks, and is reported to be in normal condition as of November 13, 2009 (Navy, 2009). Please clarify whether additional inspections have been conducted since November 2009 and, if not, please explain why.

Navy Response:

The transformer has been inspected since November 2009 and is in normal condition. This section has been revised to include the statement: “*The NAPR Base Operating Support contractor visually inspects the transformer for leaks and completes a monthly checklist. The transformer is currently (August 2010) in a normal condition.*”

3. Please provide PREQB with copies of all executed transfer documents.

Navy Response:

The Navy will provide copies of all executed transfer documents to PREQB.