

FINDING OF SUITABILITY TO TRANSFER

PORT PARCEL

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



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December 2008

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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 Port and Fuel Farm Parcels (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 three of the documents listed in Exhibit A (References) – the *CERFA Identification of Uncontaminated Property, Former Naval Station Roosevelt Roads, Puerto Rico* (the CERFA Report; Navy, 2006b), *Phase I/II Environmental Condition of Property Report, Former Naval Station Roosevelt Roads, Ceiba, Puerto Rico* (the ECP Report; Navy, 2005) and the *Covenant Deferral Request, Former Naval Station Roosevelt Roads, Ceiba, Puerto Rico* (the CDR; Navy, 2007). 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. As shown on the Vicinity Map in Exhibit B, the Subject Property is comprised of approximately 131 acres located in the developed waterfront area along the eastern shoreline of Ensenada Honda. It includes a fueling pier, cargo pier and berthing pier, port operations buildings, various hauling and storage facilities, extensive bulkheading, and an associated fuel tank farm located north and northwest of the port facilities. The Port Parcel is comprised of Sub-Parcels 44 (Fuel Farm) and 49 (Port), as shown on the maps (Exhibit C) from the *Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico* (GMI, 2005), and the boundary survey maps included as Exhibit D.

Table 1 (Exhibit E) provides 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.

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3.0 PAST USE AND PROPOSED REUSE

The Subject Property has been used for port and fuel farm activities since its acquisition and development by the Navy in the 1940s. The ECP Report states that most of the arable land on what is now NAPR was previously used for sugar cane cultivation and cattle grazing. No significant industrial facilities or environmental concerns were identified with respect to activities conducted on the former NSRR prior to Navy ownership.

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.

The proposed reuse is waterfront commercial, ferry and light cargo terminal, and continued operation of the fuel tank farm. The Subject Property is expected to be transferred via a Public Benefit Conveyance to the Ports Authority of Puerto Rico (CBRE et al, 2004).

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 are 11 Resource Conservation and Recovery Act (RCRA) Solid Waste Management Units (SWMUs) on the Subject Property. Five of these SWMUs have been designated Corrective Action Complete without Controls and require no further action, one is designated Corrective Action Complete with Controls, and five have work remaining to be completed under the Administrative Order on Consent (Consent Order; EPA, January 2007) that sets out the Navy's corrective action obligations under RCRA. Following transfer of the two parcels comprising the Subject Property to the Ports Authority, the Navy will continue to implement any remaining

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corrective and/or remedial action required for SWMUs located within the parcels, pursuant to the Consent Order.

A RCRA Facility Investigation (RFI) was not required at three of the 11 (SWMUs 21, 22, and 36) that received No Further Action (NFA) determinations under the 1994 RCRA Part B permit, and the RFI for SWMU 24 found no evidence of a release. Under the Consent Order, the NFA determination is contingent for SWMU 38 (Sanitary and Storm Sewer Systems) based upon the Navy fully addressing any releases that may have impacted the sanitary and/or storm sewer systems as part of the corrective action(s) for releases from SWMUs 4, 12, 13 and 14 and/or any other SWMU at the NAPR facility where releases may have impacted the sewer systems. A map showing the location of the existing sewer system at NAPR is provided in Exhibit C. A land use control plan for SWMU 23 was submitted to EPA in January 2008 changing its status to Corrective Action Complete with Controls. The five SWMUs with work remaining to be completed are SWMUs 7/8, 55, 74 (aka ECP 20) and 75 (aka ECP 21).

Detailed descriptions of all 11 SWMUs are provided in the ECP Report, while summary descriptions and their current status are provided in Table 2 (Exhibit E). The approximate locations of the 11 SWMUs are shown on the maps in Exhibits B and C. In Exhibit C, SWMU 74 (aka ECP 20) is mislabeled as SWMU 20 on Parcel Map 44, SWMU 75 (aka ECP 21) is mislabeled as SWMU 21 on the eastern end of the Parcel 49 map, and SWMUs 38 and 74 are shown on separate maps.

B. Petroleum Contamination

According to the ECP Report, there were 11 operational underground storage tanks (USTs) on the Subject Property at the time of the ECP inspection in March 2005, including seven that are part of SWMUs 7/8 (Tow Way Fuel Farm). All 11 USTs were empty at the time of the ECP inspection. The ECP Report also listed seven known former UST systems on the Subject Property that were removed between 1993 and 2003, including two that are also part of SWMUs 7/8. Table 3 in Exhibit E 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 also documented 17 operational aboveground storage tanks (ASTs) and 10 oil/water separators (OWSs) on the Subject Property. These ASTs and OWSs are also listed in Table 3.

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The Navy is conducting a monitored natural attenuation (MNA) study of eight petroleum sites (7 USTs and one AST) that comprise Area of Concern (AOC) F. AST 1995, a 4,200,000-gallon diesel fuel marine tank located in Parcel 44, is the one MNA site at NAPR that is part of the Subject Property. When NSRR was an active installation, the study was conducted in accordance with monitoring protocols developed by the Underground Storage Tank Management Division of the Puerto Rico Environmental Quality Board (EQB). In accordance with requirements of the Consent Order, a Draft Final MNA Work Plan was submitted to EPA in October 2008 to address Total Petroleum Hydrocarbons contamination in groundwater associated with AST 1995. As approved by EPA, Navy is collecting additional field data to finalize the work plan.

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 40 CFR 280. There are no other known spills or releases associated with USTs, ASTs and OWSs on the Subject Property, other than those designated as SWMUs or AOCs.

In October 2006, an oil sheen was noticed near Pier #3. The sheen area was about 15 feet by 50 feet. The source of the leak was found to be a fuel pump-out line under the pier that had not been used for several years. The point of the leak (drip) was coming from an area covered with rust. A sausage boom was placed around the leak area and the pipe was wrapped with oil absorbent blankets. All fuel tanks and lines at NAPR had been emptied and filled with nitrogen as part of the caretaker process to have the facilities ready for reuse after property transfer. This particular line had three valves and apparently at least one was closed preventing the remaining fuel from being removed and nitrogen from filling the line. The line was found to be completely full. About 660 gallons were pumped out and the line was then permanently capped.

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.

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- **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 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, with the exception of SWMUs 23 and 24 (Category 2) and SWMUs 7/8, 38, 55, 74 and 75 (Category 3), was classified as Category 1 uncontaminated property (including SWMUs 21, 22, and 36) in the CERFA Report. Following its review, the Puerto Rico Environmental Quality Board (EQB) provided a concurrence statement in the Final CERFA Report on 11 August 2006 (Exhibit F).

The Category 1 and 2 areas on the Subject Property are suitable for transfer because they are either uncontaminated or all remedial actions necessary to protect human health and the environment have been taken. The Category 3 areas may also be transferred even though all required remedial actions have not yet been taken to address residual contamination because on July 30, 2008, Governor Acevedo Vilá approved the Navy's request, as contained in the aforementioned CDR, for the "early" transfer of these sites in accordance with the requirements of Section 120(h)(3)(C) of CERCLA.

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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 5 of the 22 facilities inspected on the Subject Property, as summarized in Table 4 of Exhibit E. No friable, accessible and damaged (FAD) ACM was identified on the Subject Property. Detailed information about the materials identified and sampled during the asbestos inspection, including summary tables, location drawings, photographs and laboratory reports, is included in the report.

It is likely that undiscovered ACM associated with underground utilities and miscellaneous building materials exists at NAPR. While this potential ACM does not currently 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 will be required to use best management practices during any future renovation/demolition activities or underground utility work, and to comply with all applicable laws relating to ACM management in order to ensure future protection of human health and the environment.

3. Lead-Based Paint

The NAPR facilities list (Exhibit E, Table 1) indicates 22 of the buildings, structures and facilities on the Subject Property were constructed prior to 1978, the year in which lead-based paint (LBP) was banned for consumer use. These facilities and any others built before 1978 are presumed to contain LBP. A LBP survey and risk assessment was completed at NAPR in 2005 for military family housing only, thus none of the facilities on the Subject Property were included in the survey. A Lead-Based Paint Hazards Advisory Statement (Exhibit G) will be provided to the transferee for execution at the time of transfer.

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4. Polychlorinated Biphenyls

Only one polychlorinated biphenyl (PCB) containing transformer remains at NAPR. The transformer, located in Building 386, is not on the Subject Property. All other PCB-contaminated transformers and equipment were removed from the former NSRR prior to 1998. Due to the age of the majority of facilities and the size of the station, it is possible that PCB-contaminated 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 Open-File Report 93-292-K, *Preliminary Geologic Radon Potential Assessment of Puerto Rico* (USGS, 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 U.S. Environmental Protection Agency (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 sub-parcel maps in Exhibit C, breeding habitat for the endangered yellow-shouldered blackbird has been identified on the Subject Property. The Commonwealth of Puerto Rico has committed to zoning the property in a manner that will implement the planning, development, maintenance, mitigation and use requirements described on the parcel maps.

In accordance with the Endangered Species Act, the Navy developed a Biological Assessment 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*

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Roads/Naval Activity Puerto Rico Final Report (Navy, 2006a), 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.

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 1 year or more, released or disposed on the Subject Property in excess of those reportable quantities specified under 40 CFR 373 (Hazardous Substances Reporting Requirements for Selling or Transferring Federal Real Property), and all response actions taken to date to address any such releases or disposals. Hazardous materials use/storage and hazardous waste generation/management at the former NSRR are discussed in Section 5.2 of the ECP Report. The hazardous substances notice and response action summary for the Subject Property is attached to this FOST as Exhibit H.

C. CERCLA Covenants

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. This covenant will not apply to any remedial action required on the property to the extent that an act or omission of the transferee results in a new release of hazardous substances or where the transferee has assumed responsibility for the remedial action pursuant to a written agreement with the Navy.

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The deed that conveys the Subject Property will not contain the covenant provided for under CERCLA Section 120(h)(3)(A)(ii)(I) (that all necessary remedial actions have been taken prior to transfer) because that particular covenant was deferred by way of Governor Vila's approval of the covenant deferral request for the early transfer of this site on July 30, 2008. In accordance with CERCLA Section 120(h)(3)(C)(iii), after the Navy completes all necessary remedial activities on the subject property, a separate warranty will be provided in recordable form to the LRA (or its successor(s) in interest) that all response actions necessary to protect human health and the environment have been taken on the Subject Property with respect to those hazardous substances which remained on the Subject Property at the date of early transfer. Alternatively, in accordance with CERCLA Section 120(h)(3)(B), the Navy may provide this warranty upon a determination by USEPA that the remedial actions at the Subject Property are "operating properly and successfully."

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 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

With the exception of AOC F and SWMUs 7/8, 23, 55, 74 and 75, the Navy will transfer the Subject Property without restrictions. To prevent unacceptable risks to human health and the environment, the Navy will ensure the following land use controls (LUCs) are developed on the aforementioned SWMUs:

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- A restriction on land use to non-residential uses only. (SWMUs 7/8, 23, 55, and 74, 75)
- A restriction on access and/or certain invasive activities in areas where surface soil, subsurface soil and or sediments are contaminated. (SWMUs 7/8, 74, 75)
- A restriction on use of groundwater and installation of new wells in or near areas of known groundwater contamination. (AOC F and SWMUs 7/8 and 55, 74, 75)
- A restriction on access to the interior of Building 803. (SWMU 75; the duration of this LUC will depend on the outcome of the RFI/CMS)

These LUCs will be implemented through the Navy-EPA Consent Order and the subsequent transfer deed. The Navy transfer deed for the Subject Property will refer to LUC requirements contained in the Consent Order which will be attached to the deeds. The Consent Order requires the establishment of LUCs with detailed requirements (implementation, compliance, monitoring, enforcement, modification/termination, etc.) developed in other documents agreed to between the Navy and EPA or the new owner and EPA.

F. Environmental Compliance Agreements / Permits / Orders

On January 29, 2007, the U.S. Department of the Navy and EPA voluntarily entered into a Consent Order that set out the Navy's corrective action obligations under RCRA and replaced the 1994 RCRA permit as the document memorializing these obligations concerning NAPR. Of the 11 RCRA SWMUs on the Subject Property, five (SWMUs 7/8, 55, 74 and 75) have investigation and/or cleanup work remaining to be completed under the terms of the Consent Order, as does AOC F. Detailed descriptions of all 11 SWMUs and AOC F are provided in the ECP Report, while summary descriptions and their current status are provided in Table 2 (Exhibit E).

The Puerto Rico EQB issued a draft Title V Operating Permit, number TV9711-19-0397-0012, for air emissions at the former NSRR in Spring 2003. This draft permit went into public review on July 8, 2003, where NSRR presented extensive comments/changes due to the relocation of many tenant commands. A final Title V Operating Permit was issued by EQB on September 30, 2006. NSRR had a wide variety of small emission sources, which operate intermittently, with no set operation schedule. Most emissions were generated by combustion sources, which are powered by diesel, JP-5, gasoline or propane gas. VOCs and hazardous air pollutants were also

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generated in painting activities, cleaning operations associated with aircraft and ship maintenance and repair and other day-to-day activities. Significant emission units on the Subject Property included fuel truck loading/unloading and a UST at Building 192A, and touch-up painting (ships/boats) at Building 2351. Because of station closure, air emission sources associated with the Subject Property have been discontinued with the exception of the operation of emergency generators. There is no documentation of any current, or previous Notices of Violation issued to the former NSRR as a result of a deviation from the Title V Permit.

G. Notification to Regulatory Agencies / Public

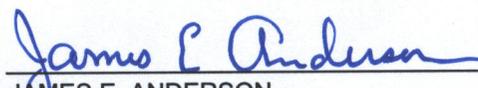
In accordance with DoD guidance, EPA Region 2 and Puerto Rico EQB have been advised of the proposed transfer of the Subject Property, and copies of the ECP Report, CERFA Report, CDR and Draft FOST were provided to those agencies for review and comment. Navy responses to EPA review comments on the draft version of this FOST are provided in Exhibit I. Puerto Rico EQB did not have comments following their review of the FOST. The ECP Report was made available for public review upon finalization, and the CDR was made available for public review and comment prior to finalization. Copies of all transfer documentation will be made available to EPA and EQB representatives upon request after execution of the same.

6.0 SUITABILITY DETERMINATION

NOW THEREFORE, based on my review of the information contained in this FOST, the notices discussed herein, and the restrictions and covenants that will be contained in the deed, the Subject Property is suitable for transfer.

Date

1/05/09



JAMES E. ANDERSON

Director

BRAC Program Management Office Southeast
North Charleston, South Carolina

Exhibit A

References

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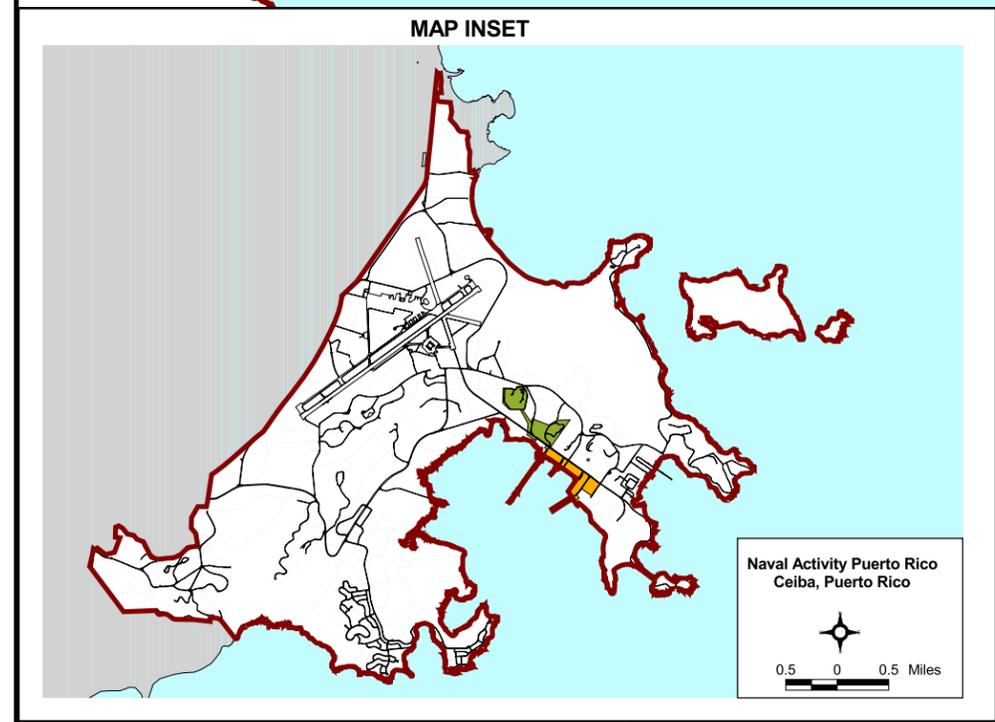
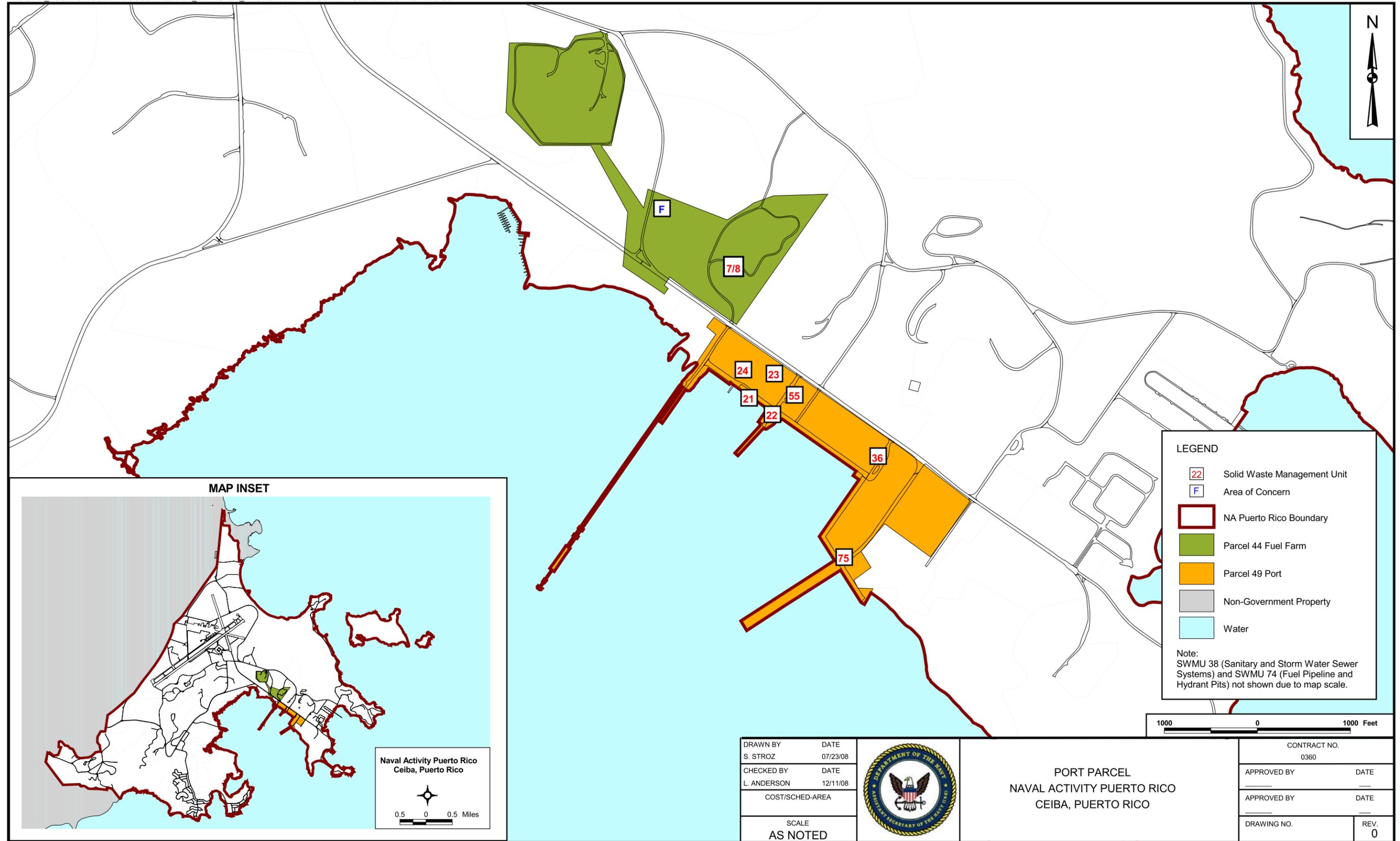
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- Navy, 2006b. (Department of the Navy, Base Realignment and Closure Program Management Office Southeast) *CERFA Identification of Uncontaminated Property, Former Naval Station Roosevelt Roads, Puerto Rico*. North Charleston, South Carolina, April 27, 2006.
- Navy, 2007. (Department of the Navy, Base Realignment and Closure Program Management Office Southeast) *Covenant Deferral Request, Former Naval Station Roosevelt Roads, Ceiba, Puerto Rico*. North Charleston, South Carolina. July 2007.
- USGS, 1993. (U.S. Geological Survey) *Open File Report 93-292-K, Preliminary Geologic Radon Potential Assessment of Puerto Rico*. 1993.

Exhibit B

Vicinity Map

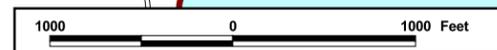
SWMUs 38 and 74 (aka ECP 20) are not shown on the vicinity map. Separate utility (SWMU 38) and fuel line (SWMU 74) maps are included in Exhibit C.



LEGEND

- 22 Solid Waste Management Unit
- F Area of Concern
- NA Puerto Rico Boundary
- Parcel 44 Fuel Farm
- Parcel 49 Port
- Non-Government Property
- Water

Note:
SWMU 38 (Sanitary and Storm Water Sewer Systems) and SWMU 74 (Fuel Pipeline and Hydrant Pits) not shown due to map scale.



DRAWN BY S. STROZ	DATE 07/23/08
CHECKED BY L. ANDERSON	DATE 12/11/08
COST/SCHED-AREA	
SCALE AS NOTED	



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CONTRACT NO. 0360	
APPROVED BY	DATE
APPROVED BY	DATE
DRAWING NO.	REV. 0

Exhibit C

Parcel, Utility, and Fuel Line Maps

NOTE: The parcel maps in this exhibit are from the *Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico* (GMI, 2005).

The areas shown on these maps as having “Cleanup Remaining” correlate to Area of Concern (AOC) F and Solid Waste Management Units (SWMUs) 7/8, 21, 22, 23, 24, 36, 55, and 75 (shown as ECP 21). SWMUs 38 and 74 (aka ECP 20) are not shown on the parcel maps. Separate utility (SWMU 38) and fuel line (SWMU 74) maps have been included.

THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 44

Common Name—Port

Conveyance—PBC

Neighboring Parcel(s)—28, 40-43, 45, 46, 48

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- Notify USFWS if a yellow-shouldered blackbird nest is found anywhere on the property (787-851-7297).
- 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
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).
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

Sea Turtle

GENERAL REQUIREMENTS

- Consult with U.S. Fish and Wildlife Service (USFWS) and Puerto Rico Department of Environmental Resources (DNER) on all beach use plans and permit requirements.
- Notify USFWS if you observe an injured or dead turtle anywhere on the property (787-851-7297).
- Pesticide and herbicide applications must follow Commonwealth of Puerto Rico regulations.

Activity	Conservation Measures
Beach Development/Use	Implement all USFWS and Puerto Rico DNER lighting standards/requirements (includes parcels bordering the nesting area). Implement USFWS/ Puerto Rico DNER precautionary measures for sea turtles before, during, and after development activities. Establish a 50 m buffer zone between any developed or undeveloped site and the land edge of the sea turtle nesting beach.

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.

NAVSTA ROOSEVELT ROADS UTILITIES INFRASTRUCTURE

LEGEND

- WATER ———
- GRAVITY ———
- FORCE ———
- MAIN ———
- ELECTRICAL ———

BUILDING POWERED BY SUBSTATION "ALPHA"

- 200- Hangar
- 379-AMD
- 1625-VC-8
- 378-AFTWTF
- 368-AFTWTF
- 2333-Air Cargo
- 1819-AFTWTF
- 1987-AFTWTF
- 2245-MK-30
- 790-SOCSOUTH
- 460-Water Tank
- 426-Airops
- 777-Grachude Loft
- 1203-Gate-1
- 825-Crash Crew
- 826-Avionics
- 825-AFTWTF

BUILDING POWERED BY SUBSTATION "BUNDY"

- 725-728-BOQ
- 729-Finnigan's
- 1688-BOQ
- 598-ADMIN
- 1689-FBI
- 1687-Gym
- 500-502-SOCSOUTH
- 5000-5004-SOCSOUTH
- 731-734-BEQ
- 735-ACSS/SOCSOUTH
- 2357- Marines Reserve
- 690-Theater
- 2374-Marines OMS
- 519-SOCSOUTH
- 529-Stables
- 1757-STP
- 646-Gate 3
- 1211-Golf Pro Shop
- 724-HIDTA

BUILDING POWERED BY SUBSTATION "CHARLIE"

- 1707-1709 BEQ
- 1808-GALLEY
- 208-DISCO
- 208-TV STUDIO
- DN 2-3 AEWTF
- 2384-COMMISARY
- 1807-SECURITY
- 898-DRONE SHOP
- 78-WEAPON
- 78-NAVY RESERVE
- 2302-ACC (security)
- 784-TACAN
- 1799-BSO
- 427-LOX PLANT
- 201-AUTO HOBBY
- 202-PSD
- 203-HRO
- 256-AFTWTF
- 1981-AFTWTF
- 2045-ASR

BUILDING POWERED BY SUBSTATION "DELTA"

- 386-AFTWTF
- 644-AFTWTF
- 1970-FURNITURE
- 1971-L/S
- 1796-NEX
- 2298-AFTWTF
- 2336-NFCU
- 2338-DENTAL
- 2337-CHAPEL
- 2035-BOWLING
- 2303-NAVY LODGE
- 2313-MCDONALDS
- 2339-MINI MART
- 2302-FSC
- 2085-ELEMENT SCHOOL
- 2362-CDC

BUILDING POWERED BY SUBSTATION "INDIA"

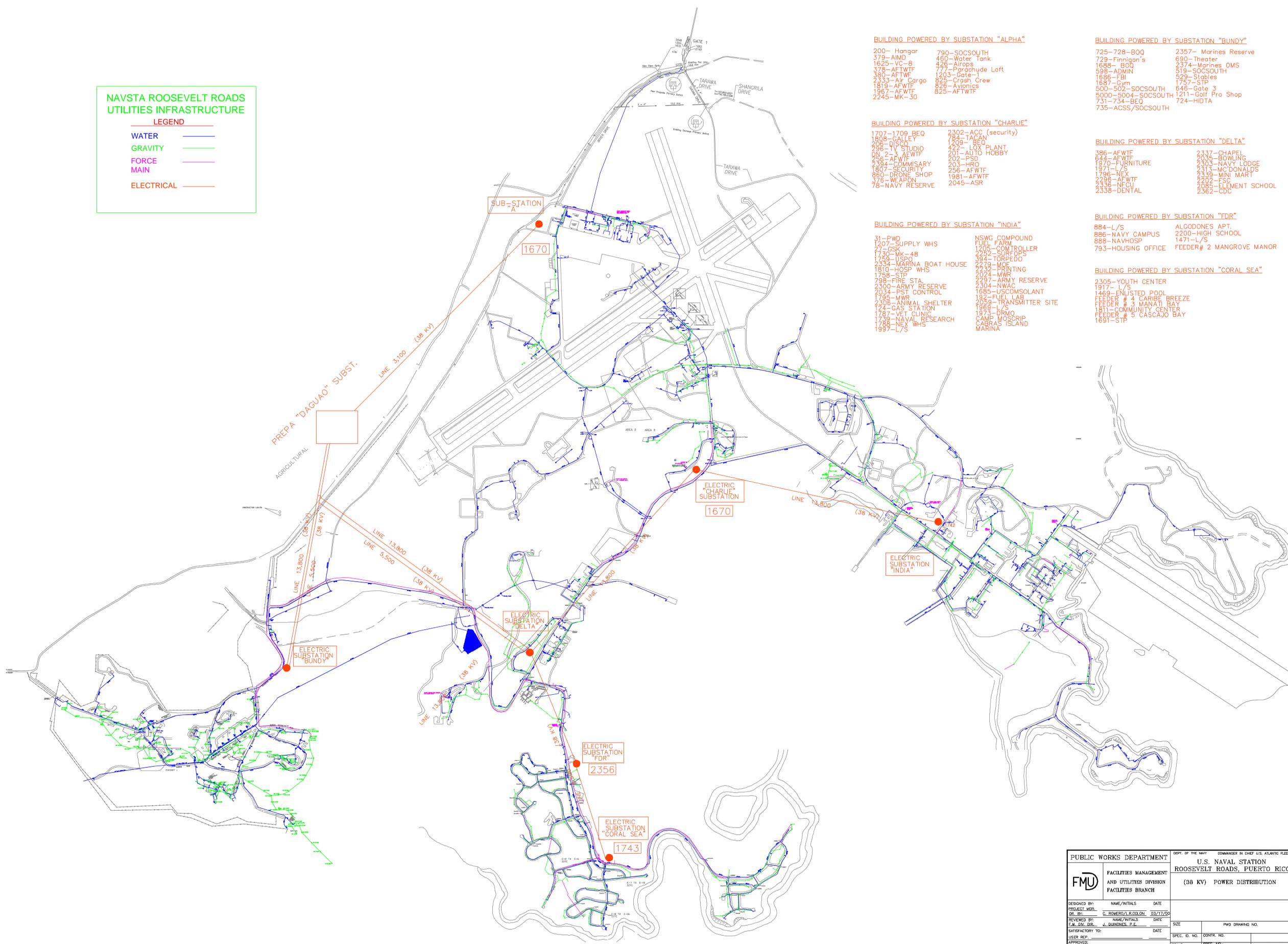
- 31-PWD
- 1207-SUPPLY WHS
- 1730-MK-48
- 1749-USPO
- 2334-VIRGINA BOAT HOUSE
- 1810-HOSP WHS
- 1758-STP
- 298-FIRE STA
- 230-ARMY RESERVE
- 2034-PST CONTROL
- 1795-MWR
- 2308-ANIMAL SHELTER
- 124-GAS STATION
- 1787-VET CLINIC
- 1739-NAVAL RESEARCH
- 1788-NEX WHS
- 1997-L/S
- NSWG COMPOUND
- FUEL FARM
- 1205-COMTROLLER
- 2303-SURF OPS
- 394-TORPEDO
- 2373-MOF
- 2332-FRINTING
- 2024-MWR
- 2397-ARMY RESERVE
- 2304-NWAC
- 1685-USCOMSOLANT
- 197-FUEL L/S
- 2059-TRANSMITTER SITE
- 1969-L/S
- 1873-DRM
- CAMP DRMO
- CARRAS ISLAND MARINA

BUILDING POWERED BY SUBSTATION "FDR"

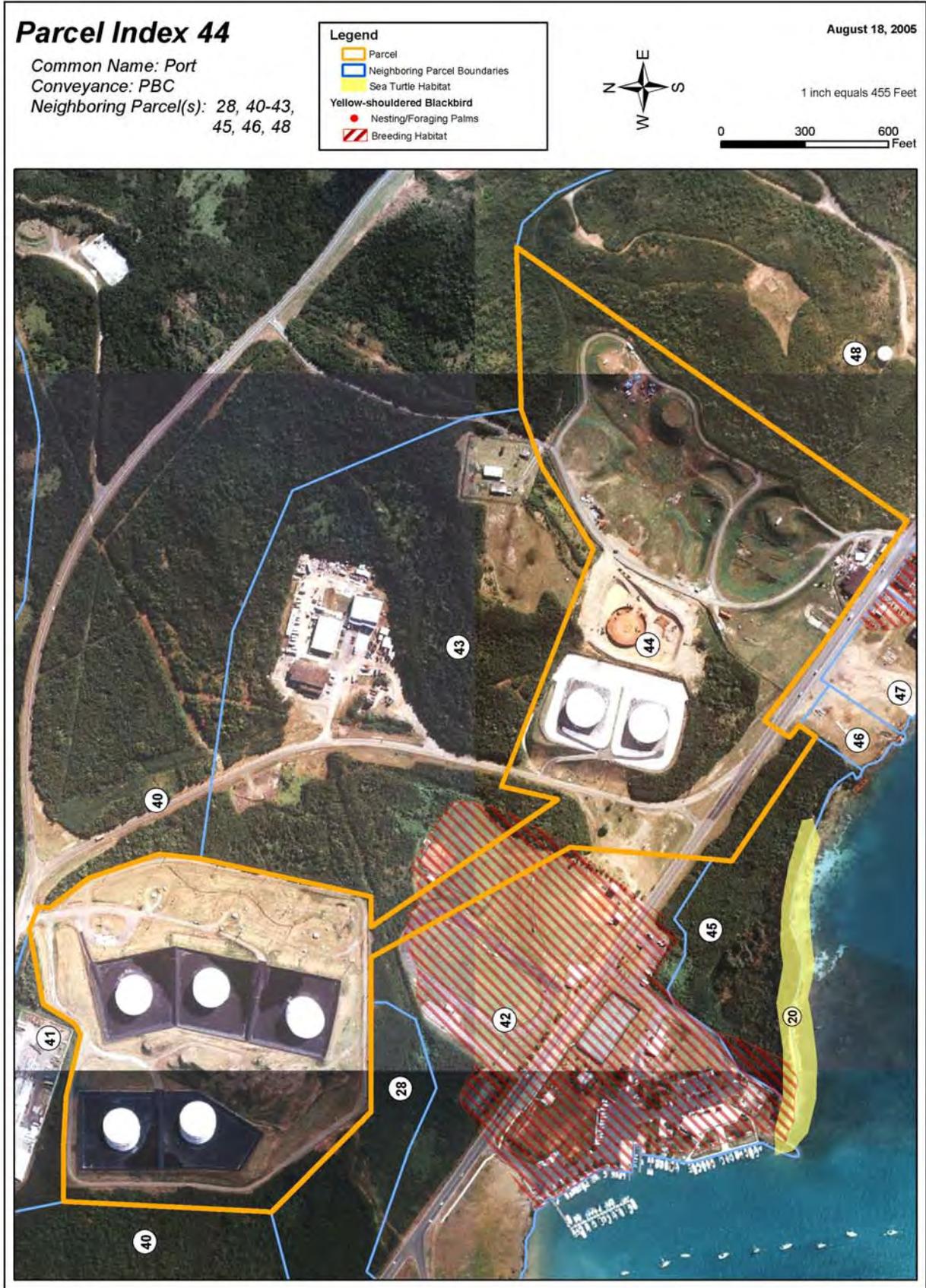
- 884-L/S
- 886-NAVY CAMPUS
- 888-NAVHOSP
- 793-HOUSING OFFICE
- ALGODONES APT.
- 2200-HIGH SCHOOL
- 1471-L/S
- FEEDER # 2 MANGROVE MANOR

BUILDING POWERED BY SUBSTATION "CORAL SEA"

- 2305-YOUTH CENTER
- 1917-L/S
- 1469-ENLISTED POOL
- FEEDER # 4 CARIBE BREEZE
- FEEDER # 3 MANATI BAY
- 1811-COMMUNITY CENTER
- FEEDER # 5 CASCAJO BAY
- 1691-STP



PUBLIC WORKS DEPARTMENT		DEPT. OF THE NAVY		COMMANDER IN CHIEF U.S. ATLANTIC FLEET	
FACILITIES MANAGEMENT AND UTILITIES DIVISION		U.S. NAVAL STATION ROOSEVELT ROADS, PUERTO RICO			
FACILITIES BRANCH		(38 KV) POWER DISTRIBUTION			
DESIGNED BY:	NAME/INITIALS	DATE			
PROJECT MGR:	G. ROMERO/AL. ROLON	03/17/00			
REVIEWED BY:	NAME/INITIALS	DATE			
F.W. DIV. DIR.:	J. GUINONES, P.E.		SIZE	P.W.D. DRAWING NO.	
SATISFACTORY TO:	DATE	SPEC. ID. NO.	CONTR. NO.		
APPROVED:	PUBLIC WORKS OFFICER	SCALE NOTED	SPEC. NO.:	SHEET X OF Y	



Parcel Index 44

Common Name: Port
Conveyance: PBC
Neighboring Parcel(s): 28, 40-43,
45, 46, 48

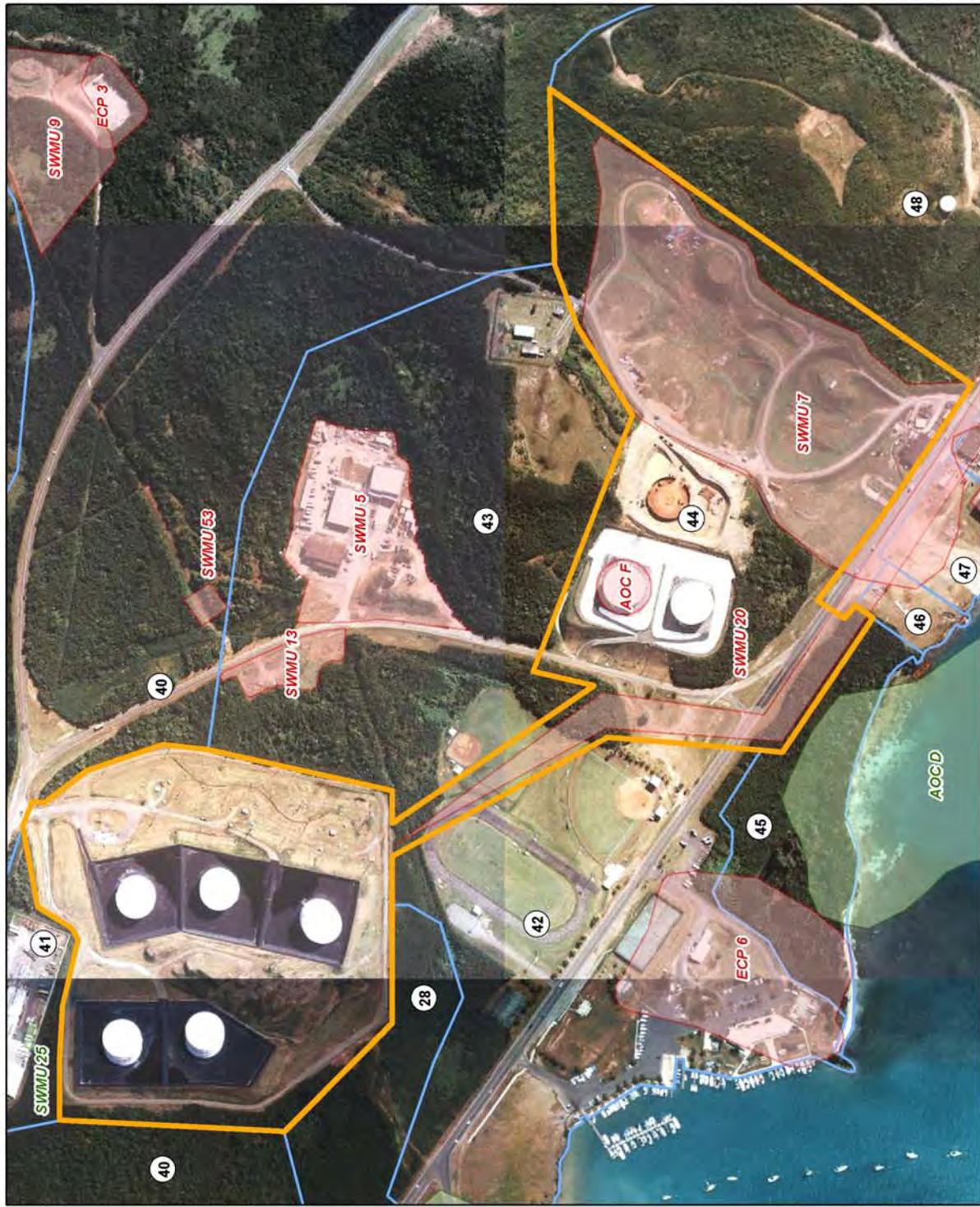
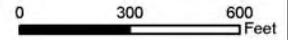
Legend

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



August 18, 2005

1 inch equals 455 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 49

Common Name—Port

Conveyance—PBC

Neighboring Parcel(s)—47, 48, 51, 53, 54, 56

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- Notify USFWS if a yellow-shouldered blackbird nest is found anywhere on the property (787-851-7297).
- 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.
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 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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

Sea Turtle

GENERAL REQUIREMENTS

- Consult with U.S. Fish and Wildlife Service (USFWS) and Puerto Rico Department of Environmental Resources (DNER) on all beach use plans and permit requirements.
- Notify USFWS if you observe an injured or dead turtle anywhere on the property (787-851-7297).
- Pesticide and herbicide applications must follow Commonwealth of Puerto Rico regulations.

*Parcel Map for the Disposal
of Naval Activity Puerto Rico*

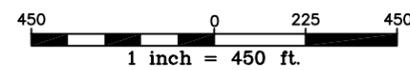
Activity	Conservation Measures
Beach Development/Use	Implement all USFWS and Puerto Rico DNER lighting standards/requirements (includes parcels bordering the nesting area). Implement USFWS/ Puerto Rico DNER precautionary measures for sea turtles before, during, and after development activities. Establish a 50 m buffer zone between any developed or undeveloped site and the land edge of the sea turtle nesting beach.

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.

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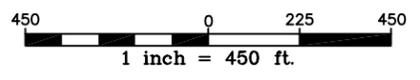
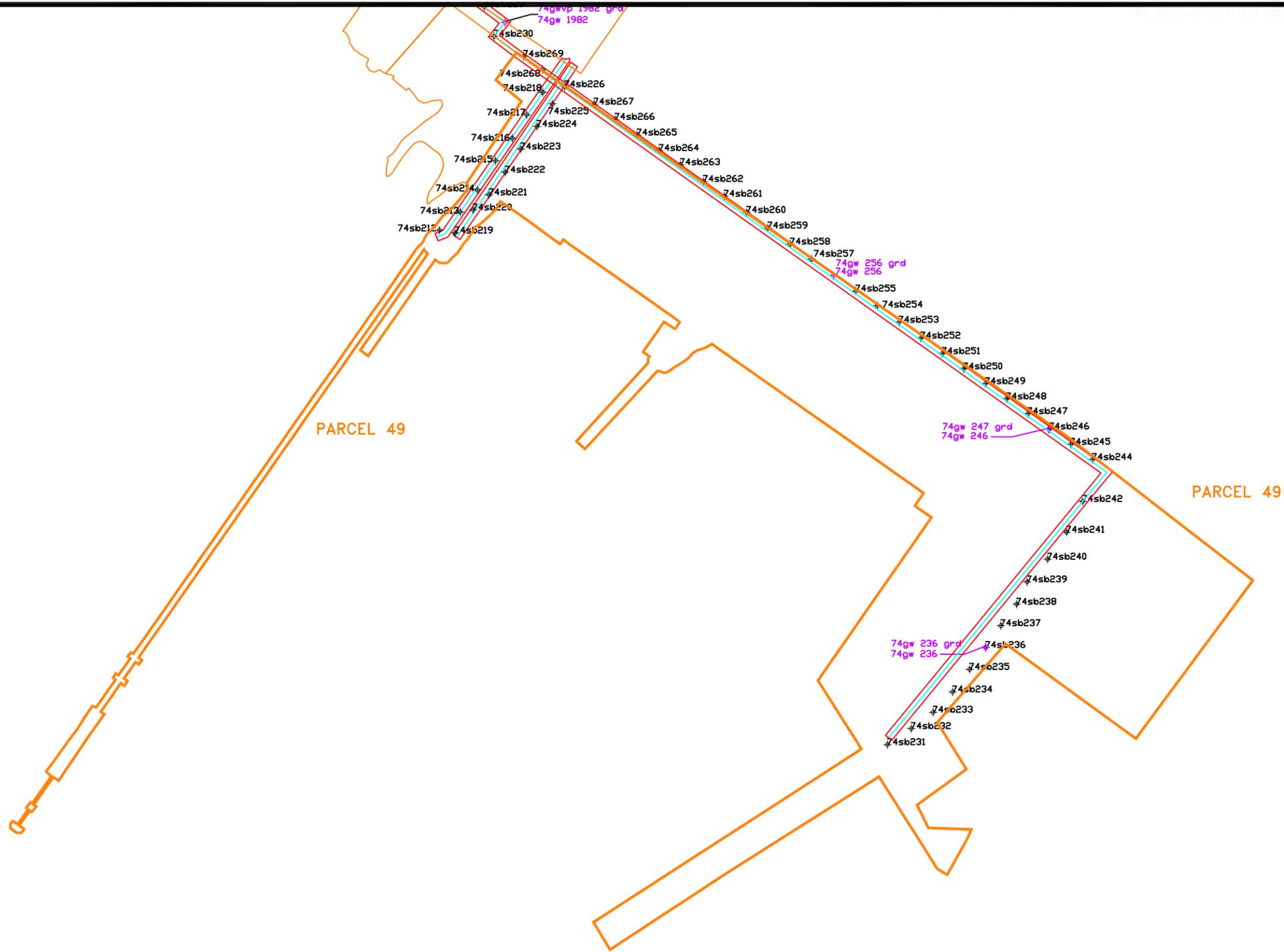




LEGEND

—	- PARCEL BOUNDARY
—	- SWMU BOUNDARY
—	- FUEL LINE
+	- SAMPLES COLLECTED

FIGURE –
PARCEL 49
SWMU 74–FUEL PIPELINES AND
HYDRANT PITS
NAVAL ACTIVITY PUERTO RICO



LEGEND	
	- PARCEL BOUNDARY
	- SWMU BOUNDARY
	- FUEL LINE
	- SAMPLES COLLECTED

FIGURE -
PARCEL 49

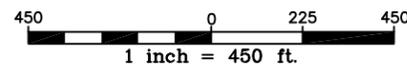
SWMU 74-FUEL PIPELINES AND
HYDRANT PITS

NAVAL ACTIVITY PUERTO RICO



PARCEL 44

PARCEL 44



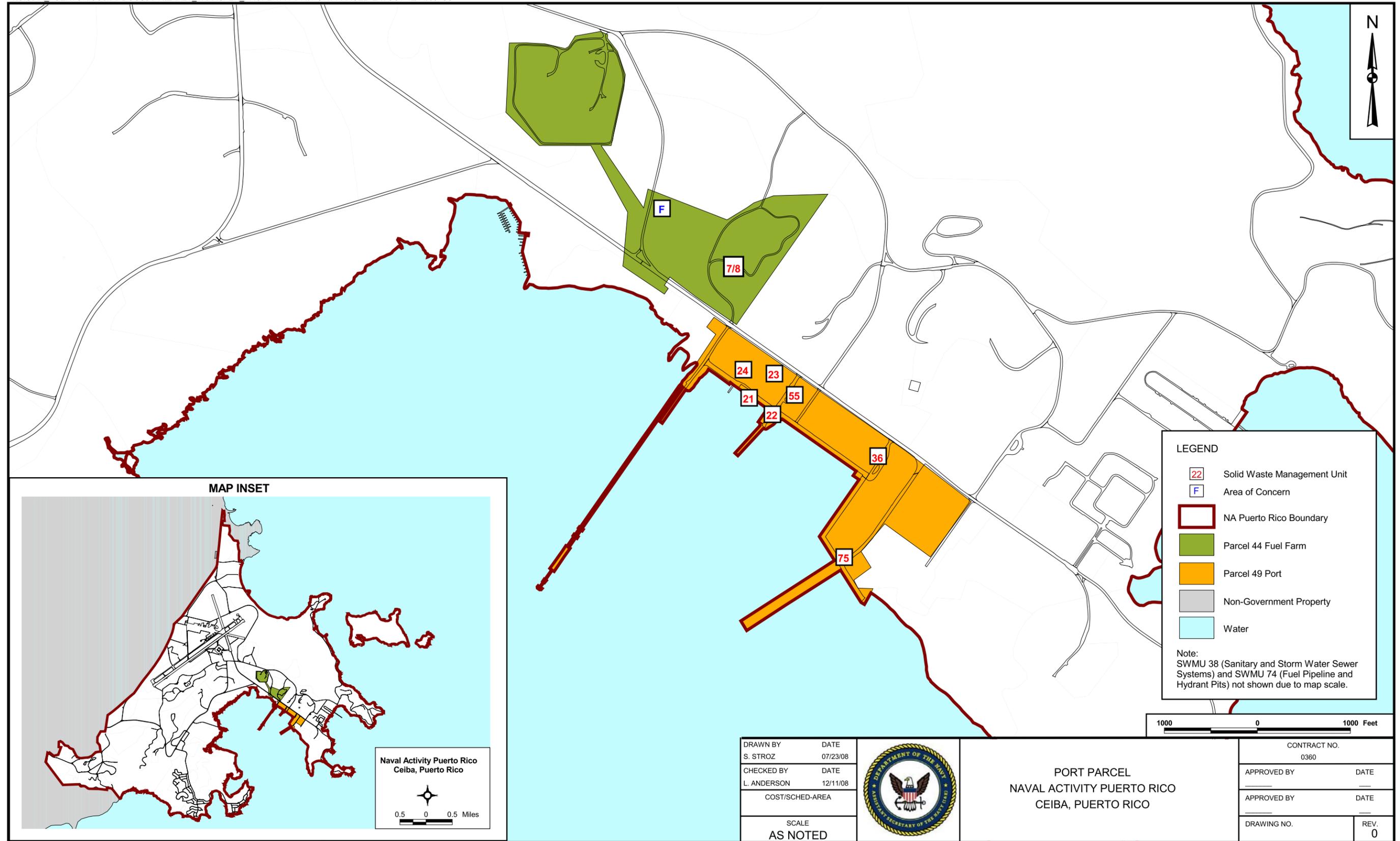
- LEGEND**
- - PARCEL BOUNDARY
 - - SWMU BOUNDARY
 - - FUEL LINE
 - ⊕ - SAMPLES COLLECTED

FIGURE -
PARCEL 44

SWMU 74-FUEL PIPELINES AND
HYDRANT PITS

NAVAL ACTIVITY PUERTO RICO

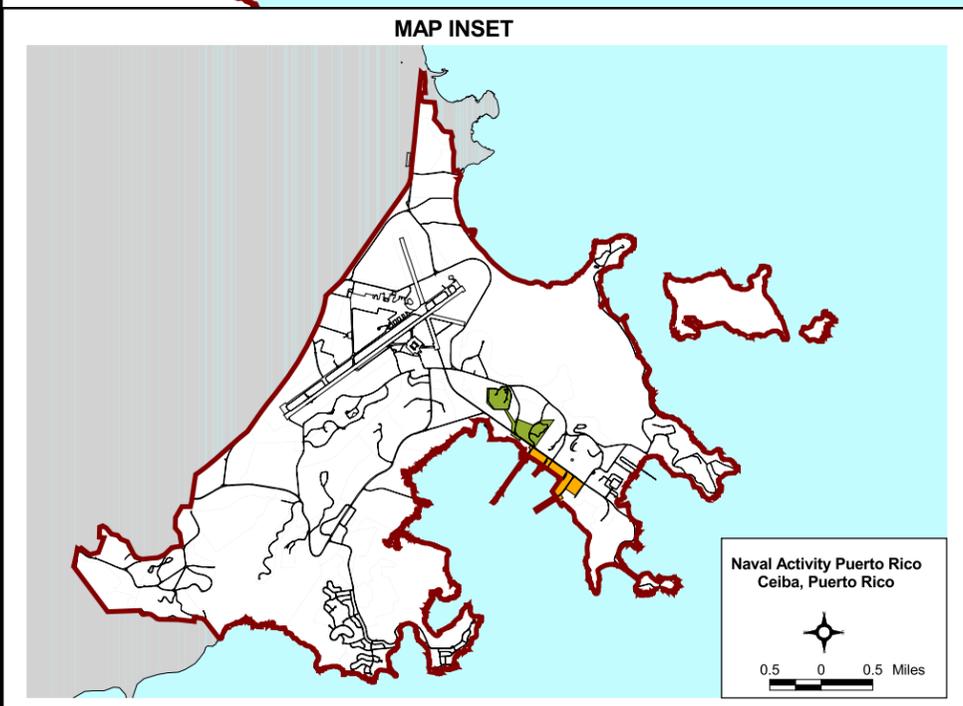
Exhibit D
Survey Maps



LEGEND

- 22 Solid Waste Management Unit
- F Area of Concern
- NA Puerto Rico Boundary
- Parcel 44 Fuel Farm
- Parcel 49 Port
- Non-Government Property
- Water

Note:
SWMU 38 (Sanitary and Storm Water Sewer Systems) and SWMU 74 (Fuel Pipeline and Hydrant Pits) not shown due to map scale.



DRAWN BY S. STROZ	DATE 07/23/08
CHECKED BY L. ANDERSON	DATE 12/11/08
COST/SCHED-AREA	
SCALE AS NOTED	



PORT PARCEL
NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO

CONTRACT NO. 0360	
APPROVED BY	DATE
APPROVED BY	DATE
DRAWING NO.	REV. 0

Exhibit E

Tables

Table 1
Naval Activity Puerto Rico
Port Parcel FOST
Facilities List
Page 1 of 2

Facility #	Former User	Name	Area	Unit	Yr Built
VP27	-	Valve Pit	-	-	0
192	FUELS	Petroleum Test Fuel Lab	4923	SF	1956
193	MWR	Toilet (Pier 1 Area)	139	SF	1955
266	SURFOPS	Fuel Pier 1	1322	SY	1943
267	SURFOPS	Pier 2 (Cargo)	1680	SY	1954
280	SURFOPS	Small Craft Berthing	-	-	1944
371	SURFOPS	Operational Storage	4000	SF	1958
799	SURFOPS	Berthing Pier #3	16040	SY	1966
843	SURFOPS	LST Ramp Bulkhead C	-	-	1963
890	-	Bulkheads A, B, C, D	2400	-	1965
896	SURFOPS	Valve Pit Pier #3	512	-	1966
976	SURFOPS	Hose Rack Shed	400	SF	1966
978	PWD	Shore POW Submarines Pier #3	650	-	1966
1706	BOYSCOUTS	Boy Scouts Charter	960	SF	1969
1739	NRL	Naval Research Lab	4,479	SF	1969
1756	HSG	Housing Storage/Warehouse	8000	SF	1974
1759	POST OFF	Fleet Post Office Pier Area	7505	SF	1973
1795	MULTI	U.S. Customs Office/NEX Laundry	5800	SF	1974
1796	NEX	Navy Exchange Complex	82606	SF	1973
1816	PWD	Hose House	2250	SF	1977
1940	-	POL (9) Pump Hse	5494	SF	-
1985	-	Vehicle Wash Rack Waterfront	156	SF	1978
1993	-	Sewage Pump Station Post Office	-	-	1978
2024	MWR	Pier #4/ITT Travel	4000	SF	1972
2036	PWD	Shore Support Building	2606	SF	1983
2040	FUELS	Hose Rack Fuel Division	1200	SF	1983
2086	SURFOPS	Flam Liqd Stge Bldg by SUROP	550	SF	1985
2127	-	Trans Sta by Sub-Sta #1742	-	-	1986
2160	-	Transformer by USO B1795	-	-	1978
2191	SURFOPS	Metal Shed (Bulkhead A) Pier 1	144	SF	1983
2197	-	Substa Pad Pier 2 Shore Power	330		1967
2238	-	UHF Antenna Harbor Comm WASP	-	-	1985
2242	MWR	Game Room/Telephone Center by USO	1600	SF	1987
2252	SURFOPS	Waterfront Operations Building	15356	SF	1987
2264	SURFOPS	Finger Pier BTW Pier 2 & 3	-	-	1987
2310	MWR	Shelter by Pier 3 Building 799	190	SF	1990
2314	SECURITY	MWR Stage (Old B46)	3600	SF	1991
2328	AFWTF	Storage Building/Waterfront by B2036	2500	SF	1991
2330	SURFOPS	Oil Spill Storage by B2552	2500	SF	1989
2346	SURFOPS	Fuel Mooring Facility	-	-	1993
2350	AFWTF	Supply Storage Building	4000	SF	7348
2351	SECURITY	Security Boathouseby by B2252	5200	SF	1995
2384	PWD	New Generator Building by B1971	143	SF	1994

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.

Table 1
Naval Activity Puerto Rico
Port Parcel FOST
Facilities List
Page 2 of 2

- Information not available or unknown

AFWTF	Atlantic Fleet Weapons Training Facility
HSG	Housing
POST OFF	Post Office
PWD	Public Works Department
MULTI	Multiple Users
MWR	Morale, Welfare and Recreation
NRL	Naval Research Laboratory
SURFOPS	Surface Operations

Table 2
Naval Activity Puerto Rico
Port Parcel FOST
Solid Waste Management Units Summary and Status
Page 1 of 3

Parcel	SWMU No.	Description	CERFA ^a	RCRA Status	Investigation and Remedial Action Summary and Status	Media Affected / Key Contaminants	Site Specific Land Use Controls	Current RCRA Phase	Remaining Work Required
Port	7/8	Tow Way Fuel Farm (incl. free product plumes and sludge disposal pits) SWMU 7 is an area affected by releases from numerous large, partially in-ground, concrete fuel storage tanks dating from the 1940s. Constructed prior to 1957, the fuel farm originally consisted of nine underground storage tanks (USTs) containing diesel fuel marine (DFM), Bunker C fuel, and jet fuel (JP-5). That number has since been reduced to seven by the removal of two tanks. Over the years, spills have occurred and tanks have leaked. SWMU 8 is comprised of unlined earthen pits adjacent to the TWFF fuel tanks. Sludges from the tanks were buried and covered with soil when the fuel tanks were periodically cleaned. SWMU 8 has been combined with SWMU 7 because the SWMUs are next to each other and the contaminants are the same and comingled.	3	ICM/CMI	IRP Round 1 (1986) groundwater monitoring found benzene above the Maximum Contaminant Level (MCL) for drinking water and a free product layer underground. A full RFI of soil and groundwater was required by the permit. A free product recovery system is operating at the site as an Interim Corrective Measure (ICM) to stop the free product from spreading. CMS Approved 2/06; Statement of Basis (SoB) approved 1/07. Continue the ICM consisting of monthly gauging, free product removal, and development of Quarterly Progress Reports. The Consent Order requires implementation of the Revised Final CMS Work Plan.	GW, Subsurface and Surface Soil, Sediment - metals, SVOCs, VOCs	1, 2, 4	Continue operation of ICM until implementation of CMI in accordance with the CMS.	CMI Work Plan and implementation of CMI in accordance with the CMS.
Port	21	Mobile Floating Tanks Four mobile, floating tanks ("donuts") utilized in the clean-up of marine oil/fuel spills. The spilled oil/fuel was gathered by skimmers and then pumped into the "donuts", which transport the collected oil/fuel/water mixture to a dock or other transfer point.	1	CAC w/out Controls	These donuts were basically transport vehicles, not units in which hazardous wastes were stored. Therefore, these tanks are not SWMUs, and an RFI was not required. No Further Action determination from 1994 Part B Permit.	NA		NA	None
Port	22	Mobile Barges/SWOBs Ship waste offload barges (SWOBs) used to collect and transport bilge and ballast water from ships and oil/fuel from marine spills. These barges are transport vehicles, not units in which hazardous wastes are stored. Therefore, they are not SWMUs, and a RFI was not required.	1	CAC w/out Controls	These barges were transport vehicles, not units in which hazardous wastes were stored. Therefore, they are not SWMUs, and an RFI was not required. No Further Action determination from 1994 Part B Permit.	NA		NA	None
Port	23	Oil Spill Separator Tanks Three rectangular, steel oil/water separator tanks underlain by a curbed, concrete pad. Located approximately 100 feet inland from the Fuel Pier, and partially surrounded by asphalt pavement. These tanks acted as first stage gravitational oil/water separators for bilge and ballast water and oil/fuel/water mixtures from spills transferred from SWOBs and "donuts" (SWMUs #21 and 22). During both the 1988 VSI and the 1993 follow-up inspection, the concrete pad and adjacent areas of asphalt pavement and soil were heavily stained.	2	CAC with Controls	Benzo(a)pyrene in one soil sample exceeded its residential Risk-Based Concentration (RBC); however, the concentration did not trigger an unacceptable human health risk. Because of the location of this SWMU within an industrial zone, the RFI stated this site will never be utilized for residential development. There were no releases of hazardous waste or hazardous constituents evident at this site. The RFI did not recommend any further characterization efforts or corrective measures at this site. The Consent Order designated the SWMU Corrective Action Complete with Controls (i.e., a land use restriction to prohibit residential land use). A Land Use Control Plan was submitted to EPA in January 2008.	Soil - benzo(a)pyrene < industrial, TPH	1	NA	None
Port	24	Oil Spill Oil/Water Separator and Adjoining Pad (VC-8 Bldg 1625) In-ground, concrete, oil/water separator that served as the second stage separator of bilge and ballast water and marine oil/fuel spills. This SWMU is surrounded by asphalt paving on three sides, and bare ground on one side. Staining of the asphalt was observed during the 1993 follow-up inspection. Also, during the 1993 follow-up inspection, a bermed pad, with heavy oil staining, was identified as part of this SWMU.	2	CAC w/out Controls	RFI did not find any evidence of a release. The Consent Order designated this site Corrective Action Complete without Controls.	NA		NA	None

Table 2
Naval Activity Puerto Rico
Port Parcel FOST
Solid Waste Management Units Summary and Status
Page 2 of 3

Parcel	SWMU No.	Description	CERFA ^a	RCRA Status	Investigation and Remedial Action Summary and Status	Media Affected / Key Contaminants	Site Specific Land Use Controls	Current RCRA Phase	Remaining Work Required
Port	36	Vehicle Wash Rack Oil/Water Separator (Berthing Pier) Inground, concrete oil/water separator located near the Berthing Pier within the Ensenada Honda. This separator was used to collect and separate oil and washwaters generated during vehicle washdown. No evidence of releases was reported during the 1988 VSI, or 1993 follow-up inspection.	1	CAC w/out Controls	No Further Action determination from 1994 Part B Permit. No knowledge or evidence of systematic and routine releases of hazardous wastes or constituents from this unit. No evidence of release was reported during the 1988 VSI or the 1993 follow-up inspection. RFI was not required. Visual re-inspection of unit was conducted during the ECP field work; no visual evidence of release was observed.	NA	None	NA	None
Basewide	38	Sanitary and Storm Water Sewer Systems Below ground sanitary and storm sewer systems.	3	CAC w/out Controls	No Further Action determination from 1994 Part B Permit carried over to Consent Order. No knowledge or evidence of systematic and routine releases of hazardous wastes. An RFI was not required. The "CAC w/out Controls" shown for SWMU 38 is contingent, under the 2007 RCRA Consent Order between the Navy and EPA, on the Navy fully addressing any releases that may have impacted the sanitary and/or storm sewer water sewer systems (i.e., SWMU 38) as a release(s) from either SWMUs 4, 12, 13 and 14, and/or from any other SWMU at the NAPR facility, where releases have impacted the sanitary and/or storm water sewer systems.	NA	None	NA	None
Port	55	TCE Plume near Tow Way Fuel Farm (formerly part of SWMU 7) Groundwater investigations at the Tow Way Fuel Farm (SWMU 7) detected the presence of TCE and associated compounds. These constituents were not historically detected in groundwater at SWMU 7 and were not related to historic activities at SWMU 7. For these reasons, the TCE plume was considered a separate source of contamination from SWMU 7 and thus identified as SWMU 55.	3	CMS	Final TCE Plume Delineation and Source Investigation Report recommended a CMS for SWMU 55 in August 2004. CMS Final Report was developed and recommended the performance of a pilot test injecting sodium permanganate to evaluate the oxidation technology at SWMU 55. The CMS needs to be initiated at SWMU 55.	GW - TCE	1, 4	Implementation of the CMI in accordance with the CMS.	CMI Work Plan and implementation of CMI in accordance with the CMS.
Airfield, Ports, 3	74	Fuel Pipelines and Hydrant Pits On the Subject Property, this site consists of specific portions of the JP-5 fuel pipeline, and the aircraft hydrant refueling pits. In 1995, an evaluation of the integrity of specific portions of the base POL system identified a leak at a JP-5 fuel line valve pit between Hangar 200 and the main runway. Interviews indicated that numerous small spills and leaks of jet fuel have occurred at the aircraft hydrant refueling pits since they went into operation in the early 1960s.	3	CMS	ECP Phase I/II sample locations indicating contaminant releases associated with this SWMU on the Subject Property were Valve Pit 8 and USTs 381, 1084 and 1086. The Navy submitted a CMS Work Plan to complete site characterization and the CMS. The work plan includes additional characterization along the underground fuel lines in the Subject Property. Phase I of the CMS Investigation was conducted in May 2008. Report on the findings of Phase I of the CMS Investigation is underway, and will identify areas needing further study.	Soil, GW - fuel related compounds	1	CMS Investigation	CMS/SoB/CMI
Port	75	Building 803 Pump house for the former emergency fire deluge system located in the Waterfront area next to Pier 3. The floor of the building is constructed with an access area/manway that leads directly into Ensenada Honda. During inspections, releases of suspected waste oil and diesel fuel throughout the floor of the building were noted. Additionally, numerous discarded oil filters and three batteries were identified during the site inspection.	3	RFI	PCBs were the primary concern at this site and were not detected; however wipe samples collected to characterize the interior of the building indicate potential contamination resulting from past activities. Therefore, the Consent Order required an RFI for this site. The Final RFI work plan was submitted to EPA December 20, 2007.	Interior surfaces - bis(2-ethylhexyl)phthalate, di-n-butylphthalate, metals	Access to building interior restricted.	RFI	Implement RFI and follow on work

Table 2
Naval Activity Puerto Rico
Port Parcel FOST
Solid Waste Management Units Summary and Status
Page 3 of 3

Parcel	SWMU No.	Description	CERFA ^a	RCRA Status	Investigation and Remedial Action Summary and Status	Media Affected / Key Contaminants	Site Specific Land Use Controls	Current RCRA Phase	Remaining Work Required
Port	AOC F (MNA 1995)	Site of 1 current AST (inactive and empty; Bldg 1995) One of seven former UST sites and one current AST site that comprise the AOC F MNA sites at NAPR (the other six are on other parcels). After the removal of the USTs and the subsequent investigations and reports, the sites were recommended for remedial action by MNA with separate protocols for each site, including soil sampling and/or groundwater sampling on a quarterly or annual basis depending upon the site.	3	MNA	Submitted MNA Work Plan to EPA October 9, 2007. EPA contingently approved the MNA Work Plan April 10, 2008. The first round of sampling under the new work plan was conducted in May 2008. The report is presently under development and will be submitted in August 2008.	GW - TPH	4	MNA monitoring	Continuation of MNA monitoring program in accordance with MNA Work Plan
^a CERFA categories:									
1 - CERFA Clean - areas where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred,									
2 - All Actions Complete - areas where the release, disposal, or migration, or some combination thereof, of hazardous substances, or									
3 - Additional Action Required - Areas where a confirmed or suspected release, disposal, migration, or some combination thereof, of									
Land Use Controls									
1 - Non-Residential Use Only									
2 - Soil and/or Sediment: Access and/or Invasive Activity Restriction									
3 - Surface Water: Access and/or Use Restriction									
4 - Groundwater: Use and Well Installation Restriction									
Acronyms and Abbreviations									
AOC	Area of Concern			MCL	Maximum Contaminant Level				
AST	Aboveground Storage Tank			MNA	Monitored Natural Attenuation				
CAC	Corrective Action Complete determination			NEX	Navy Exchange				
CERFA	Community Environmental Response Facilitation Act			NPDES	National Pollutant Discharge Elimination System				
CMI	Corrective Measures Implementation			OB/OD	Open Burning/Open Detonation				
CMS	Corrective Measures Study			PAH	Polynuclear Aromatic Hydrocarbon				
COC	Chemical of Concern			PCB	Polychlorinated Biphenyl				
COPC	Chemical of Potential Concern			POL	Petroleum, Oils and Lubricants				
DFM	Diesel Fuel Marine			RBC	Risk-Based Concentration				
ECP	Environmental Condition of Property			RFI	RCRA Facility Investigation				
EPA	Environmental Protection Agency			SoB	Statement of Basis				
ICM	Interim Corrective Measure			TCE	Trichloroethene				
IRP	Installation Restoration Program			TWFF	Tow Way Fuel Farm				
JP-5	Jet Propulsion Fuel			UST	Underground Storage Tank				
GW	Groundwater			VOC	Volatile Organic Compound				

Table 3
Naval Activity Puerto Rico
Port Parcel FOST
OWS, AST, UST List
Page 1 of 2

Number	Type	Location or User	Capacity	Material Stored	Year Installed	Year Removed
193	OWS	Aircraft Fuel Truck Area - Hose Stg	-	NA	-	NA
266	OWS	Pier 1	-	NA	-	NA
382	OWS	Aircraft Fuel Truck Area	-	NA	-	NA
443	OWS	Aircraft Fuel Truck Area - Parking	-	NA	-	NA
799	OWS	Oil Pollution Control System - Pier 3	-	NA	-	NA
1982	OWS	Fuel Pump House Facility	-	NA	-	NA
1985	OWS	Vehicle Wash Rack - Surface Ops	-	NA	-	NA
2036	OWS	Shore Support Bldg (fiberglass repair shop)	-	NA	-	NA
2311	OWS	Temporary Wash Rack	-	NA	-	NA
2364	OWS	Heavy Equipment Wash Area	-	NA	-	NA
BOWTS 1	AST	PWD	50,000	Oily Wastewater	-	NA
BOWTS 2	AST	PWD	50,000	Oily Wastewater	-	NA
BOWTS 3	AST	PWD	1,000	Used Oil	-	NA
BOWTS 4	AST	PWD	1,000	Used Oil	-	NA
BOWTS 5	AST	PWD	1,000	Used Oil	-	NA
56C	AST	PWD	5,000	Used Oil	-	NA
803	AST	PWD	275	Used Oil	-	NA
1995	AST	Fuels Division (MNA Site)	4,200,000	DFM	-	NA
1996	AST	Fuels Division	4,200,000	DFM	-	NA
2036	AST	FRT	2,000	Used Oil	-	NA
2250	AST	FRT	12,000	Used Oil	-	NA
2270	AST	Fuels Division	4,200,000	JP-5	-	NA
2271	AST	Fuels Division	4,200,000	JP-5	-	NA
2272	AST	Fuels Division	4,200,000	JP-5	-	NA
2273	AST	Fuels Division	4,267,000	JP-5	-	NA
2274	AST	Fuels Division	4,200,000	JP-5	-	NA
2437	AST	Fuels Division	4,200,000	DFM	-	NA
82	UST	DFM Hill, Tow Way Fuel Farm (SWMU 7/8)	2,115,000	DFM/Empty	1940	NA
83	UST	DFM Hill, Tow Way Fuel Farm (SWMU 7/8)	1,157,000	DFM/Empty	1940	NA
84	UST	DFM Hill, Tow Way Fuel Farm (SWMU 7/8)	585,000	None/Empty	1944	NA
85	UST	DFM Hill, Tow Way Fuel Farm (SWMU 7/8)	1,152,000	None/Empty	1944	NA
381	UST	West of bulk fuel ASTs 2270-2274 (SWMU 74)	1,180,000	JP-5/Empty	1955	NA
1080	UST	Tow Way Fuel Farm (SWMU 7/8)	1,165,000	DFM/Empty	1968	NA
1082	UST	Tow Way Fuel Farm (SWMU 7/8)	1,165,000	DFM/Empty	1968	NA
1084	UST	By ASTs 2270-2274 (SWMU 74)	1,181,000	JP-5/Empty	1968	NA
1086	UST	By ASTs 2270-2274 (SWMU 74)	1,181,000	JP-5/Empty	1968	NA
1088	UST	Tow Way Fuel Farm (SWMU 7/8)	425,000	JP-5/Empty	1968	NA
1982	UST	Fuels Pump Station	550	Waste Oil/Empty	1996	NA

Table 3
Naval Activity Puerto Rico
Port Parcel FOST
OWS, AST, UST List
Page 2 of 2

Number	Type	Location or User	Capacity	Material Stored	Year Installed	Year Removed
55	Former UST	DFM Hill (SWMU/7/8)	5,000	Unknown	-	1997
56A	Former UST	Bldg 564	15,000	DFM	1996	2003
56A	Former UST	Bldg 56	10,500	DFM	-	1996
56B	Former UST	Bldg 56	15,000	DFM	1996	2003
56B	Former UST	Bldg 56	10,500	DFM	-	1996
99	Former UST	DFM Hill (SWMU/7/8)	10,000	Unknown	-	1993
382	Former UST	North of bulk fuel AST 2272	550	Waste JP-5	-	1996

AST Aboveground Storage Tank
BOWTS Bilge and Oily Wastewater Treatment System
DFM Diesel Fuel Marine
FRT Facility Response Team
JP Jet Propulsion (Fuel)
MNA Monitored Natural Attenuation
NA Not Applicable
OWS Oil Water Separator
PWD Public Works Division
SWMU Solid Waste Management Unit
UST Underground Storage Tank
- Information not available or unknown

Table 4
Naval Activity Puerto Rico
Port Parcel FOST
Asbestos-Containing Material Inspection Results

Facility #	Name	ACM Identified	Comments
VP27	Valve Pit	NI	
192	Petroleum Test Fuel Lab	Y	
193	Toilet (Pier 1 Area)	N	
266	Fuel Pier 1	NI	
267	Pier 2 (Cargo)	NI	
280	Small Craft Berthing	NI	
371	Operational Storage	N	
799	Berthing Pier #3	NI	
843	LST Ramp Bulkhead C	NI	
890	Bulkheads A, B, C, D	NI	
896	Valve Pit Pier #3	NI	
976	Hose Rack Shed	N	
978	Shore POW Submarines Pier #3	NI	
1706	Boy Scouts Charter	Y	
1739	Naval Research Lab	Y	
1756	Housing Storage/Warehouse	N	
1759	Fleet Post Office Pier Area	N	
1795	U.S. Customs Office/NEX Laundry	Y	
1796	Navy Exchange Complex	N	
1816	Hose House	NI	
1940	POL (9) Pump Hse	NI	
1985	Vehicle Wash Rack Waterfront	NI	
1993	Sewage Pump Station Post Office	NI	
2024	Pier #4/ITT Travel	N	
2036	Shore Support Building	N	
2040	Hose Rack Fuel Division	N	
2086	Flam Liqd Stge Bldg by SUROP	N	
2127	Trans Sta by Sub-Sta #1742	NI	
2160	Transformer by USO B1795	NI	
2191	Metal Shed (Bulkhead A) Pier 1	NI	
2197	Substa Pad Pier 2 Shore Power	NI	
2238	UHF Antenna Harbor Comm WASP	NI	
2242	Game Room/Telephone Center by USO	Y	
2252	Waterfront Operations Building	N	
2264	Finger Pier BTW Pier 2 & 3	NI	
2310	Shelter by Pier 3 Building 799	N	
2314	MWR Stage (Old B46)	NI	
2328	Storage Building/Waterfront by B2036	N	
2330	Oil Spill Storage by B2552	N	
2346	Fuel Mooring Facility	NI	
2350	Supply Storage Building	N	
2351	Security Boathouse by B2252	N	
2384	New Generator Building by B1971	N	

Notes:
Y = Yes
N = No
NI = Not Inspected
Hazard = friable, accessible and damaged asbestos (none identified)

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

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

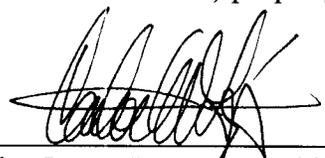


R. DAVID CRISWELL, P. E.
BRAC Environmental Coordinator

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

Lead-Based Paint Hazard Advisory

**LEAD-BASED PAINT HAZARD
DISCLOSURE AND ACKNOWLEDGEMENT FORM**

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

ACKNOWLEDGEMENT

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 *Finding of Suitability to Transfer – Port Parcel, 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 H

CERCLA Hazardous Substance Notice and Response Action Summary

**Naval Activity Puerto Rico
Port and Fuel Farm Parcels
CERCLA Hazardous Substance Notice/Response Action Summary
Page 1 of 3**

The table below identifies those hazardous substances that it is known, based upon a complete search of agency files, were stored for one year or more in quantities greater than or equal to 1,000 kg (or greater than or equal to 1 kg if designated an acutely hazardous waste under 40 CFR Part 261.30) and/or were released or disposed of on the property to be transferred in quantities greater than or equal to their respective reportable quantities under 40 CFR 302.4. The information in this notice is required under the authority of regulations promulgated under Section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA" or "Superfund"), 42 U.S.C. Section 9620(h).

Bldg or Facility ID	Description	Substance Name	CAS Registry Number	40 CFR 302.4 Regulatory Synonyms	RCRA HW No.	Quantity Stored	Date of Storage	Quantity Released	Date of Release	Response Actions Taken
2086	Surface Operations	HWAA - see SWMUs 17 & 18	---	---	---	---	---	---	---	---
SWMU 8	Tow Way Road Sludge Burial Pits	Lead	7439921	---	D008	Unknown	1972 or 1973 to Present	Unknown	1972 or 1973 to Present	---
		Bunker C Fuel Sludge	---	---	---	3,900-7,500 cubic yards	1972 or 1973 to Present	3,900-7,500 cubic yards	1972 or 1973 to Present	---
SWMU 17	DRMO HW Storage Facility (non-flammable wastes) - not on Subject Property, but received wastes from various port and/or fuel farm operations.	Various non-flammable hazardous wastes	---	---	---	Capacity = 17,400 gals	1980-2004	Unknown	Unknown	---
		Lead	7439921	---	D008	Unknown	1980-2004	Unknown	Unknown	---
		Potassium Hydroxide	1310583	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Sodium Hydroxide	1310732	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Beryllium Dust	7440417	---	P015	Unknown	1980-2004	Unknown	Unknown	---
		Lithium/Sulfur Dioxide Batteries	---	---	D003	Unknown	1980-2004	Unknown	Unknown	---
		Nickel/Cadmium Batteries	---	---	D003, D006	Unknown	1980-2004	Unknown	Unknown	---
		Mercury Batteries	---	---	D009	Unknown	1980-2004	Unknown	Unknown	---
		Mercury Batteries in Acetic Acid	---	---	D002, D009	Unknown	1980-2004	Unknown	Unknown	---
		Aid to Navigation (AtoN) Batteries	---	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Alkaline Batteries	---	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Lead/Acid Batteries	---	---	D002, D008	Unknown	1980-2004	Unknown	Unknown	---
		Lead/Acid Batteries (Drained)	---	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Battery Electrolyte	---	---	D002, D008	Unknown	1980-2004	Unknown	Unknown	---
		Acetic Acid	64197	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Chromic Acid (Alodine)	7738945	---	D002, D007	Unknown	1980-2004	Unknown	Unknown	---
		Hydrochloric Acid	7647010	Hydrogen Chloride	D002	Unknown	1980-2004	Unknown	Unknown	---
		Sulfuric Acid	7664939	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Ammonium Hydroxide	1336216	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Cleaning Compound (TURCO)	---	---	D002	Unknown	1980-2004	Unknown	Unknown	---
Mercury	7439976	---	U151, D009	Unknown	1980-2004	Unknown	Unknown	---		
Blasting Booth Dust	---	---	D007, D008	Unknown	1980-2004	Unknown	Unknown	---		
Decontaminating Agent, STB (Super Tropical Bleach)	---	---	D003	Unknown	1980-2004	Unknown	Unknown	---		
Chlordane	57749	Chlordane, alpha & gamma isomers Chlordane (Technical Mixture and Metabolites) 4,7-Methano-1H-indene, 1,2,4,5,6,7,8,8-octachloro- 2,3,3a,4,7,7a-hexahydro-	---	U036	Unknown	1980-2004	Unknown	Unknown	---	
Photographic Developer	---	---	---	D002, D011	Unknown	1980-2004	Unknown	Unknown	---	
Photographic Fixer	---	---	---	D002, D011	Unknown	1980-2004	Unknown	Unknown	---	
Photographic Hardener	---	---	---	D011	Unknown	1980-2004	Unknown	Unknown	---	
Photographic Stabilizer	---	---	---	D011	Unknown	1980-2004	Unknown	Unknown	---	

**Naval Activity Puerto Rico
Port and Fuel Farm Parcels
CERCLA Hazardous Substance Notice/Response Action Summary
Page 2 of 3**

Bldg or Facility ID	Description	Substance Name	CAS Registry Number	40 CFR 302.4 Regulatory Synonyms	RCRA HW No.	Quantity Stored	Date of Storage	Quantity Released	Date of Release	Response Actions Taken
		Photographic Starter	---	---	D011	Unknown	1980-2004	Unknown	Unknown	---
		Photographic Replenisher	---	---	D002, D011	Unknown	1980-2004	Unknown	Unknown	---
		Photo Auto Reversal Chemical	---	---	D011	Unknown	1980-2004	Unknown	Unknown	---
		Hypo-Solution: Ammonium Thiosulfate	7783188	---	D011	Unknown	1980-2004	Unknown	Unknown	---
		Hypo-Solution: Sodium Thiosulfate	7772987	---	D011	Unknown	1980-2004	Unknown	Unknown	---
		Methylene Chloride	75092	Dichloromethane	F001, F002, U080	Unknown	1980-2004	Unknown	Unknown	---
		Perchloroethylene	127184	Ethene, tetrachloro Tetrachloroethene Tetrachloroethylene	F001, F002, U210	Unknown	1980-2004	Unknown	Unknown	---
		1,1,1-Trichloroethane	71556	Ethane, 1,1,1-trichloro Methyl Chloroform	F001, F002, U226	Unknown	1980-2004	Unknown	Unknown	---
		Trichloroethylene	79016	Trichloroethene Ethene, trichloro	F001, F002, U228	Unknown	1980-2004	Unknown	Unknown	---
		Trichlorofluoromethane	75694	Trichloromonfluoro-methane	F002, U121	Unknown	1980-2004	Unknown	Unknown	---
		Trichlorotrifluoroethane	76131	---	F002	Unknown	1980-2004	Unknown	Unknown	---
		Chlorinated Fluorocarbons	---	---	F001	Unknown	1980-2004	Unknown	Unknown	---
		1,1,2-Trichloroethane	79005	Ethane, 1,1,2-trichloro	F002, U227	Unknown	1980-2004	Unknown	Unknown	---
		Paint Removers	---	---	D002, F002	Unknown	1980-2004	Unknown	Unknown	---
		Carbon Remover	---	---	F002	Unknown	1980-2004	Unknown	Unknown	---
		Miscellaneous Waste Acids	---	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Miscellaneous Waste Caustics	---	---	D002	Unknown	1980-2004	Unknown	Unknown	---
		Miscellaneous Waste Reactives	---	---	D003	Unknown	1980-2004	Unknown	Unknown	---
		Misc. Halogenated Solvents (mixed waste w/ > 10% before use)	---	---	F001, F002	Unknown	1980-2004	Unknown	Unknown	---
		Misc. Halogenated Solvents (mixed waste w/ < 10% before use)	---	---	F001, F002	Unknown	1980-2004	Unknown	Unknown	---
		Magnesium Batteries	---	---	D003	Unknown	1980-2004	Unknown	Unknown	---
		Freon-Contaminated Hydraulic Fluid	---	---	F002	Unknown	1980-2004	Unknown	Unknown	---
SWMU 18	DRMO Ignitable Storage Facility - not on Subject Property, but received wastes from various port or fuel farm operations.	Various ignitable hazardous wastes	---	---	---	Capacity = 2,600 gals	1980-2004	Unknown	Unknown	---
		Gasoline (unleaded)	8006619	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Petroleum Fuels (leaded)	8006619	---	D001, D008	Unknown	1980-2004	Unknown	Unknown	---
		Jet Fuel (JP-4 or JP-5)	8008206	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Kerosene (contaminated)	8008206	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Adhesives	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Calibration Fluid	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Cleaning Compound (Mineral Spirits)	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Isopropyl Alcohol	67630	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Sealing Compound	---	---	D001, F003	Unknown	1980-2004	Unknown	Unknown	---
		Icing Inhibitor	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---

**Naval Activity Puerto Rico
Port and Fuel Farm Parcels
CERCLA Hazardous Substance Notice/Response Action Summary
Page 3 of 3**

Bldg or Facility ID	Description	Substance Name	CAS Registry Number	40 CFR 302.4 Regulatory Synonyms	RCRA HW No.	Quantity Stored	Date of Storage	Quantity Released	Date of Release	Response Actions Taken
		Inspection Penetrant	---	---	D001, F003	Unknown	1980-2004	Unknown	Unknown	---
		Denatured Alcohol	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Duplicating Fluid	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Waste Paints	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Painting Wastes	---	---	D001, D002, D007, D008, F002, F003, F005	Unknown	1980-2004	Unknown	Unknown	---
		Malathion (with carrier solvent)	121755		D001	Unknown	1980-2004	Unknown	Unknown	---
		Photographic Toners	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Corrosion Inhibitor	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Naphtha	8030306	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Acetone	67641	2-Propanone	F003, U002	Unknown	1980-2004	Unknown	Unknown	---
		Ethyl Ether	60297	Ethane, 1,1'-oxybis-	F003, U117	Unknown	1980-2004	Unknown	Unknown	---
		Isobutanol	78831	1-Propanol, 2-methyl-	F005, U140	Unknown	1980-2004	Unknown	Unknown	---
		Methanol	67561	Methyl Alcohol	F003, U154	Unknown	1980-2004	Unknown	Unknown	---
		Methyl Ethyl Ketone	78933	2-Butanone, MEK	U159	Unknown	1980-2004	Unknown	Unknown	---
		Toluene	108883	Benzene, methyl	F005, U220	Unknown	1980-2004	Unknown	Unknown	---
		Xylene	1330207	Benzene, dimethyl Xylene (mixed) Xylene (isomers and mixture)	F003, U239	Unknown	1980-2004	Unknown	Unknown	---
		MEK and Paint	---	---	F005, D007, D008	Unknown	1980-2004	Unknown	Unknown	---
		Dye Penetrant	---	---	D001, F001, F002	Unknown	1980-2004	Unknown	Unknown	---
		Dry Cleaning Solvent (PD-680-I)	64742887		D001	Unknown	1980-2004	Unknown	Unknown	---
		Stoddard Solvent	8052413		D001	Unknown	1980-2004	Unknown	Unknown	---
		Inspection Penetrant	---	---	D001, F002	Unknown	1980-2004	Unknown	Unknown	---
		Petroleum Lubricant	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Aerosol Cans (partially full)	---	---	D001, F001, F002, F003, F005	Unknown	1980-2004	Unknown	Unknown	---
		Miscellaneous Waste Ignitables	---	---	D001	Unknown	1980-2004	Unknown	Unknown	---
		Misc. Non-Halogenated Solvents	---	---	F003, F005	Unknown	1980-2004	Unknown	Unknown	---
		Misc. Petroleum, Oils & Lubricants (POLs) potentially contaminated with ignitable wastes or F-list solvents	---	---	D001, F001, F002, F003, F005	Unknown	1980-2004	Unknown	Unknown	---
		Grease contaminated with Oils	---	---	D001, D007, D008	Unknown	1980-2004	Unknown	Unknown	---
SWMU 55	TCE Plume near Tow Way Fuel Farm	Tetrachloroethylene	127184	Ethene, tetrachloro Perchloroethylene	F001, F002, U210	Unknown	Unknown	Unknown	Unknown	---
		Trichloroethylene	79016	Trichloroethene Ethene, trichloro	F001, F002, U228	Unknown	Unknown	Unknown	Unknown	---

Exhibit I

Response to EPA Comments

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Criswell
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 Finding of Suitability to Transfer (FOST) Port Parcels

Dear Mr. Criswell:

The United States Environmental Protection Agency (EPA) Region 2 has received the Draft Finding of Suitability to Transfer (FOST) Port Parcels, transmitted to Mr. Timothy Gordon of EPA and to Ms. Wilmarie Rivera of the Puerto Rico Environmental Quality Board (PREQB), with your letter of August 6, 2008.

The FOST covers approximately 131 acres in two parcels (Parcel 44 and 49), located in the developed waterfront area along the eastern shoreline of Ensenada Honda. These two parcels contain 11 solid waste management units (SWMUs) and portions of one Area of Concern (AOC). Five of the SWMUs and the portion of AOC F located in the subject parcels have corrective action work remaining to be completed under the January 2007 RCRA Administrative Order on Consent (the Order). According to the FOST, on July 30, 2008, the Governor of Puerto Rico approved a Covenant Deferral Request (CDR) allowing the early transfer of the SWMUs and AOCs located in parcels 44 and 49, prior to completing the necessary remedial actions. The Navy plans to transfer these two parcels to the Ports Authority of Puerto Rico via a Public Benefit Conveyance, but will retain responsibility for completing all required corrective and remedial actions, under the Order.

EPA Region 2 has the following comments on that Draft FOST:

- 1) A statement should be added to Section 3.0 (Past Use and Proposed Reuse) indicating that, following transfer of the two parcels to the Ports Authority of Puerto Rico, the Navy will continue to implement any remaining corrective and/or remedial action required for SWMUs and AOCs located within the parcels, pursuant to the 2007 RCRA Order.

Response: The requested statement has been added to the end of the first paragraph in

Section 4.A. (Hazardous Substances Contamination) following the first discussion of the 2007 RCRA Consent Order.

- 2) The last paragraph of Section 4.0.A (Hazardous Substance Contamination) should be revised to indicate that SWMU 20 is incorrectly shown on parcel index figure 44-3, in Exhibit C, and that what is labeled as SWMU 20 on parcel index 44-3 instead corresponds to SWMU 74 (fuel pipelines and hydrant pits), which is also known as (a/k/a) ECP¹ site 20.

Response: The last sentence of Section 4.0.A has been revised to read as follows - "In Exhibit C, SWMU 74 (aka ECP 20) is mislabeled as SWMU 20 on Parcel Map 44, SWMU 75 (aka ECP 21) is mislabeled as SWMU 21 on the eastern end of the Parcel 49 map, and SWMUs 38 and 74 are shown on separate maps."

- 3) The second sentence of the first paragraph of Section 5.0.F (Environmental Compliance Agreements/Permits/Orders) needs to be revised to read "...five (SWMUs 7/8, 55, 74 and 75) have investigations and/or cleanup work remaining to be completed....", as SWMU 23 does not have remaining work to be completed.

Response: The requested correction has been made.

- 4) The statement on the title page of Exhibit C (Parcel, Utility, and Fuel Line Maps), indicating that "SWMUs 38 and 74 (aka SWMU 20) are not shown...." needs to be corrected, to read "...SWMU 74 (a/k/a as ECP site 20)...."

Response: The requested correction has been made.

- 5) Exhibit B, should be revised to either also identify SWMUs 38 and 74 on the Vicinity Map (labeled "Port Parcel"), or include a note regarding those SWMUs on the Vicinity map.

Response: The following note has been added to the title page of Exhibit B - "SWMUs 38 and 74 (aka ECP 20) are not shown on the vicinity map. Separate utility (SWMU 38) and fuel line (SWMU 74) maps are included in Exhibit C." Also, the following note has been added to the Vicinity Map - "SWMU 38 (Sanitary and Storm Water Sewer Systems) and SWMU 74 (Fuel Pipeline and Hydrant Pits) not shown due to map scale."

Once the FOST has been revised and finalized, please submit two copies to my office. If you have any questions, please telephone Mr. Tim Gordon of my staff at (212) 637- 4167.

¹ ECP = Environmental Conditions of Property, i.e., based on the the July 15, 2005 Final Phase I/II Environmental Conditions of Property Report.

Sincerely yours,

Dale Carpenter, Chief
Resource Conservation and Special Projects Section
RCRA Programs Branch

cc: Mr. Antonio J. Colorado, Puerto Rico Land Reuse Authority
Ms. Wilmarie Rivera, P.R. Environmental Quality Board.
Mr. Mark Kimes, Baker Environmental

bcc: Carl Soderberg, Caribbean Environmental Protection Division
Carl Howard, 2ORC
Timothy Gordon, 2DEPP-RPB
RCRA File Room, 2DEPP-RPB