

EXECUTION VERSION
12-7-12

**AMENDMENT NO. 1
TO THE
ECONOMIC DEVELOPMENT CONVEYANCE
MEMORANDUM OF AGREEMENT
BETWEEN
THE UNITED STATES OF AMERICA
ACTING BY AND THROUGH THE NAVY
AND
THE LOCAL REDEVELOPMENT AUTHORITY FOR
NAVAL STATION ROOSEVELT ROADS**

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FOR NAVAL STATION ROOSEVELT ROADS**

THIS AMENDMENT NO. 1 ("Amendment No. 1") to the *Economic Development Conveyance Memorandum of Agreement between the United States of America acting by and through the Navy, and the Local Redevelopment Authority for Naval Station Roosevelt Roads* dated December 20, 2011 ("**EDC Agreement**") is entered into on this 11th day of December, 2012 (the "**Effective Date**") by and between **THE UNITED STATES OF AMERICA**, acting by and through the Department of the Navy (the "**Navy**"), and **THE LOCAL REDEVELOPMENT AUTHORITY FOR NAVAL STATION ROOSEVELT ROADS** (the "**LRA**"), recognized as the local redevelopment authority by the Office of Economic Adjustment on behalf of the Secretary of Defense with regard to the disposition and conveyance of portions of Naval Station Roosevelt Roads, Puerto Rico. The Navy and LRA are sometimes referred to herein collectively as the "**Parties.**"

RECITALS

WHEREAS, the Navy closed Naval Station Roosevelt Roads, Puerto Rico ("**NSRR**") on March 31, 2004 pursuant to Section 8132 of the Department of Defense Appropriations Act for Fiscal Year 2004 (Public Law No. 108-87; the "**Appropriations Act**") and in accordance with the procedures and authorities contained in the Defense Base Closure and Realignment Act of 1990, as amended (title XXIX of Public Law No. 101-510, 10 U.S.C. § 2687 note; the "**Base Closure Act**");

WHEREAS, by application dated December 17, 2010, the LRA applied for an Economic Development Conveyance ("**EDC**") of approximately one thousand, three hundred and seventy (1,370) acres at NSRR referred to as "**Parcel 3**", as shown on Exhibit B;

WHEREAS, on December 20, 2011, the LRA and the Navy entered into the EDC Agreement to set forth the terms and conditions for the transfer of Parcel 3 to the LRA;

WHEREAS, on January 25-26, 2012, the Navy and the LRA executed twenty-two quitclaim deeds and that certain *Lease in Furtherance of Conveyance between the United States of America and Local Redevelopment Authority for Naval Station Roosevelt Roads at the Former Naval Station Roosevelt Roads, Ceiba, Puerto Rico* ("**LIFOC**") in order to transfer Parcel 3 to the LRA;

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1 **WHEREAS**, the Navy retained ownership of a parcel consisting of one thousand, five
2 hundred and forty-two (1,542) acres at NSRR referred to as "**Parcel 1**" and a parcel consisting of
3 approximately four hundred and ninety-seven (497) acres at NSRR referred to as "**Parcel 2**", as
4 set forth in Exhibit B;

5
6 **WHEREAS**, the Parties entered into that certain *Summary of Acquisition Terms and*
7 *Conditions for Parcels 1 and 2 at Naval Station Roosevelt Roads by and between the United*
8 *States of America, acting by and through the Navy and the Local Redevelopment Authority for*
9 *Naval Station Roosevelt Roads* dated July 13, 2012 ("**Term Sheet**") to set forth the terms and
10 conditions for the transfer of Parcel 1 and Parcel 2 to the LRA by EDC; and

11
12 **WHEREAS**, the Parties wish to enter into this Amendment No. 1 in order to amend the
13 EDC Agreement to address the transfer of Parcel 1 and Parcel 2 to the LRA.

14
15 **NOW, THEREFORE**, in consideration of the foregoing premises and the respective
16 representations, agreements, covenants and conditions herein contained, and other good and
17 valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the
18 Parties agree as follows.

AGREEMENTS

Article 1. Property Description.

19
20
21
22 a. Section 3.1.1 of the EDC Agreement is hereby deleted in its entirety and replaced
23 with the following:

24
25 "3.1.1 The real property consisting of approximately one thousand, three
26 hundred and seventy (1,370) acres of land ("**Parcel 3**"), the real property
27 consisting of approximately one thousand, five hundred and forty-two (1,542)
28 acres of land ("**Parcel 1**"), and the real property consisting of approximately four
29 hundred and ninety-seven (497) acres of land ("**Parcel 2**") located within the
30 bounds of the former NSRR, as more particularly described and delineated on
31 Exhibit B, attached hereto, which shall include, but not be limited to, any right,
32 title or interest the Navy may have in the following (collectively referred to herein
33 as the "**Property**):"

34
35 b. Exhibit B to the EDC Agreement is hereby deleted in its entirety and replaced
36 with the Exhibit B attached as Attachment 1 to this Amendment No. 1.

37
38 c. Exhibit B-1 to the EDC Agreement is hereby deleted in its entirety and replaced
39 with the Exhibit B-1 attached as Attachment 2 to this Amendment No. 1.

40
41 d. Exhibit B-4 to the EDC Agreement is hereby deleted in its entirety and replaced
42 with the Exhibit B-4 attached as Attachment 3 to this Amendment No. 1.

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1 e. Exhibit C to the EDC Agreement is hereby amended to include the attached
2 FOSTs and FOSL attached as Attachment 4 to this Amendment No. 1.

3
4 **Article 2. Consideration.**

5
6 a. Sections 4.2, 4.2.1, 4.2.2, 4.2.3, and 4.2.4 of the EDC Agreement are hereby
7 deleted in their entirety and replaced with the following:

8
9 "4.2 Parcel 3 Initial Consideration.

10
11 4.2.1 Amount of Parcel 3 Initial Consideration. The LRA shall pay the
12 Navy "**Parcel 3 Initial Consideration**" for Parcel 3 in the amount of Eight
13 Million Forty Thousand Dollars (\$8,040,000.00), payable as follows:

14
15 4.2.1.1 Two Hundred Thousand Dollars (\$200,000.00) at the Initial
16 Closing ("**Initial Payment**"); and

17
18 4.2.1.2 Seven Million Eight Hundred and Forty Thousand Dollars
19 (\$7,840,000.00) in fifteen annual equal principal installments plus interest
20 (each, a "**Parcel 3 Installment Payment**"). The first Parcel 3 Installment
21 Payment is due the later of (i) September 30, 2015, or (ii) thirty (30) days
22 following the conveyance of both SWMU 3 and SWMU 70, as identified
23 on Exhibit B-4, to the LRA. Each subsequent Parcel 3 Installment
24 Payment is due on the one (1) year anniversary of the previous Parcel 3
25 Installment Payment. Each Parcel 3 Installment Payment shall consist of
26 (i) the amount of the Parcel 3 Installment Payment then due, plus (ii) the
27 Interest Rate multiplied by the amount of Parcel 3 Initial Consideration
28 that had not yet been paid as of the beginning of the prior year (i.e., the
29 Parcel 3 Initial Consideration minus the total of Parcel 3 Installment
30 Payments that were actually paid through the prior year). Interest shall be
31 calculated at 150 basis points over the U.S. Treasury 10 Year Composite
32 Note utilizing the rate established on the first day of the month
33 immediately prior to the due date that the first Parcel 3 Installment
34 Payment is due ("**Interest Rate**").

35
36 4.2.2 Pre-Payment. The Parcel 3 Initial Consideration may be pre-paid
37 by the LRA without penalty at the net present value of the amount then due as
38 calculated at 150 basis points over the U.S. Treasury 10 Year Composite Note as
39 of the date of the Initial Closing.

40
41 4.2.3 Security for Parcel 3 Initial Consideration. The LRA shall provide
42 security for the payment of the Parcel 3 Initial Consideration by a document
43 evidencing the full faith and credit of an agency, department, or instrumentality of
44 the Commonwealth of Puerto Rico or such other security that is acceptable to the
45 Navy (the "**Security Interest**") in the form set forth in Exhibit R.

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4.2.4 Deferral of Parcel 3 Initial Consideration. The expected schedule for conveyance of the portion of the Lease Parcel on Parcel 3 is attached hereto in the Conveyance Schedule and made a part hereof as Exhibit F. At the Initial Closing, the Navy will convey title to 1,020.9 of the 1,370.7 acres of Parcel 3. Together SWMU 3 and SWMU 70, as identified on Exhibit B-4, consist of 165.4 acres for a total conveyed to the LRA of 1,186.3 acres or 86.5 % of the real property on Parcel 3. The LRA shall have the right to withhold from each Parcel 3 Installment Payment an amount equal to the proportionate amount of Parcel 3 not yet conveyed to the LRA by Deed as a percentage of the total Parcel 3, multiplied by the amount then due under the Security Interest (hereinafter the "**Deferred Amount**"). No interest will accrue on the Deferred Amount, and the Deferred Amount will be added to the amount due in the next Parcel 3 Installment Payment in accordance with the terms and conditions of the Security Interest.

4.2.4.1 For clarity purposes only, the following example and description is provided. The numerator shall be equal to the total number of acres of Parcel 3 conveyed, divided by the denominator which shall be equal to the total acreage of Parcel 3 (1,370.7). Therefore, if the Navy fails to convey Parcel 3 in accordance with Section 4.2.1.2, the LRA's obligation to pay the first Parcel 3 Installment Payment will be limited to the proportionate amount of Parcel 3 actually conveyed (1,186.3 acres) divided by 1,370.7 acres, which equals 86.5% of the real property on Parcel 3. Accordingly, the LRA would be obligated to pay the Navy \$452,107.00 with \$70,560.00 deferred without the accrual of interest, and added to the LRA's obligation for Year 2 of the Security Interest. This deferral of payment under the Security Interest shall continue until all of Parcel 3 is conveyed to the LRA."

b. Section 4.3.1 of the EDC Agreement is hereby deleted in its entirety and replaced with the following:

"4.3.1 Amount of Additional Consideration. The LRA shall pay the Navy "**Additional Consideration**" in the amount of forty percent (40%) of all Real Estate Proceeds (as defined herein) in excess of Eighty Million Dollars (\$80,000,000.00) received by the LRA through September 30, 2035. When due, such payments shall be paid annually on or before September 30 of each year for the time period between June 30 of the previous year and June 30 of the current year."

c. Section 4.3.3 of the EDC Agreement is hereby deleted in its entirety and replaced with the following:

"4.3.3 Outside Scope Payments.

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Page 5.

1 4.3.3.1 Parcel 3 Outside Scope Payment. If at any time
2 within the five (5) year period beginning on the date of the Initial
3 Closing, the LRA, sells, leases, assigns, or licenses any portion of
4 Parcel 3 for a purpose not reasonably contemplated in the Reuse Plan
5 (“**Parcel 3 Outside Scope Parcel**”), the LRA agrees to pay to the
6 Navy seventy-five percent (75%) of the Net Proceeds received by
7 the LRA for such Parcel 3 Outside Scope Parcel or Parcels 1 and 2
8 Outside Scope Parcel, as applicable, in excess of the amount of the
9 Parcel 3 Initial Consideration then outstanding (“**Parcel 3 Outside**
10 **Scope Payment**”). Any Parcel 3 Outside Scope Payment required to
11 be paid to the Navy under this section shall be in lieu of an
12 Additional Consideration payment for such parcel.
13

14 4.3.3.2 Parcels 1 and 2 Outside Scope Payment. If at any
15 time within the five (5) year period beginning on the Parcels 1 and 2
16 Initial Closing (as defined below), the LRA sells, leases, assigns, or
17 licenses any portion of Parcel 1 or Parcel 2 for a purpose not
18 contemplated in the Reuse Plan (“**Parcels 1 and 2 Outside Scope**
19 **Parcel**”), the LRA agrees to pay to the Navy seventy-five percent
20 (75%) of the Net Proceeds received by the LRA for such Parcels 1
21 and 2 Outside Scope Parcel in excess of the amount of the
22 Guaranteed Consideration then outstanding (“**Parcels 1 and 2**
23 **Outside Scope Payment**”). Any Parcels 1 and 2 Outside Scope
24 Payment required to be paid to the Navy under this section shall be
25 in lieu of an Additional Consideration payment for such parcel.”
26

27 d. The following Section 4.6 is hereby added to the end of Article 4 of the EDC
28 Agreement:
29

30 “4.6 Parcels 1 and 2 Consideration.
31

32 4.6.1 Initial Payment for Parcels 1 and 2. The LRA is not
33 required to make an initial payment to the Navy on the date that Parcel 1
34 and Parcel 2 are transferred to the LRA (“**Parcels 1 and 2 Initial**
35 **Closing**”).
36

37 4.6.2 Amount of Guaranteed Consideration. The LRA shall pay
38 the Navy “**Guaranteed Consideration**” for Parcels 1 and 2 in the amount
39 of Eight Million Five Hundred Thousand Dollars (\$8,500,000.00), payable
40 in fifteen equal annual principal installments plus interest commencing
41 one (1) year after the LRA’s payment obligations for the Parcel 3 Initial
42 Consideration are completed pursuant to Sections 4.2.1.2 and 4.2.4 herein.
43

44 4.6.3 Interest on Guaranteed Consideration. Interest on the
45 Guaranteed Consideration will begin accruing seven (7) years after the

AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

Page 6.

1 Parcels 1 and 2 Initial Closing and shall be calculated at 150 basis points
2 over the U.S. Treasury 10 Year Composite Note as of the Parcels 1 and 2
3 Initial Closing.
4

5 4.6.4 Security for Guaranteed Consideration. The LRA shall
6 provide to the Navy at the Parcels 1 and 2 Initial Closing security for the
7 Guaranteed Consideration by a document evidencing the full faith and
8 credit of an agency, department, or instrumentality of the Commonwealth
9 of Puerto Rico or such other security that is acceptable to the Navy (the
10 “**Parcels 1 and 2 Note**”) in the form set forth in Exhibit R.
11

12 4.6.5 Pre-Payment. The Guaranteed Consideration may be pre-
13 paid by the LRA, in whole or in part, without penalty at the net present
14 value of the amount then due, but in no event may the amount to be pre-
15 paid by the LRA as Guaranteed Consideration be less than Eight Million,
16 Five Hundred Thousand Dollars (\$8,500,000.00). In the event that the
17 LRA elects to pre-pay the Parcel 3 Initial Consideration, the LRA’s
18 obligations to commence payment of the Parcels 1 and 2 Note are not
19 accelerated.
20

21 4.6.6 Deferral of Guaranteed Consideration. The expected
22 schedule for conveyance of the portion of the Lease Parcel on Parcel 1 is
23 attached hereto in the Conveyance Schedule and made a part hereof as
24 Exhibit F-1. At the Parcels 1 and 2 Initial Closing, the Navy will convey
25 title to approximately 1,420 of the approximately 1,542 acres of Parcel 1.
26 The LRA shall have the right to withhold from each Parcels 1 and 2
27 Installment Payment an amount equal to the proportionate amount of
28 Parcel 1 not yet conveyed to the LRA by Deed as a percentage of the total
29 Parcel 1, multiplied by the amount then due under the Parcels 1 and 2
30 Note (hereinafter the “**Parcels 1 and 2 Deferred Amount**”). No interest
31 will accrue on the Parcels 1 and 2 Deferred Amount, and the Parcels 1 and
32 2 Deferred Amount will be added to the amount due in the next Parcels 1
33 and 2 Installment Payment in accordance with the terms and conditions of
34 the Parcels 1 and 2 Note.”
35

36 **Article 3. Conveyance**

37
38 a. Section 3.2.2 of the EDC Agreement is hereby deleted in its entirety and replaced
39 with the following:

40
41 “3.2.2 The Lease Parcel, or portions thereof, is expected to be transferred
42 by Deed to the LRA in accordance with the Conveyance Schedules set forth in
43 Exhibit F and Exhibit F-1.”
44

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1 b. Attachment 5 to this Amendment No. 1 is added as Exhibit F-1 to the EDC
2 Agreement, and the Table of Exhibits is amended to include Exhibit F-1; Parcel 1 and Parcel 2
3 Conveyance Schedule.

4
5 c. The following Sections 6.3 and 6.4 are hereby added to the end of Article 3 of the
6 EDC Agreement:

7
8 “6.3 Navy Deliveries. The Navy shall deliver at the Parcels 1 and 2
9 Initial Closing and, to the extent applicable, any other Closings, the following
10 documents, as applicable (the “**Navy Parcels 1 and 2 Closing Documents**”), in a
11 form previously reviewed and approved by the LRA, and duly executed and
12 authorized (and acknowledged if necessary for recordation):

13
14 6.3.1 Deeds in the form set forth in Exhibit G-1 and Exhibit G-2.

15
16 6.3.2 Final FOST(s), as appropriate for such Parcel(s) to be
17 conveyed at such Closing that permit residential use of such Parcel(s), and
18 copies of all Regulatory Authority approvals obtained for the applicable
19 Parcel.

20
21 6.3.3 Bill of Sale for the Navy Personal Property conveyed to the
22 LRA for such Parcel(s), in substantially the form set forth in Exhibit K-1.

23
24 6.3.4 Amendment No. 1 to the LIFOC.

25
26 6.3.5 Any necessary access and other required easements and
27 rights of way, if any are required.

28
29 6.3.6 Such additional documents as may be required to record the
30 Deeds, easements, or other documents under this Agreement or by Puerto
31 Rico law.

32
33 6.3.7 Representation to the LRA, in substantially the form set
34 forth in Exhibit L-1, stating that as of the date of Closing, the Navy has the
35 full capacity, right, power, and authority to execute, deliver, and perform
36 this Agreement pursuant hereto for the Closing, unless subsequently
37 prohibited by law.

38
39 6.4 LRA Deliveries. The LRA shall deliver to the Parcels 1 and 2
40 Initial Closing and, to the extent applicable, any other Closings, the following
41 documents in a form previously reviewed and approved by the Navy, and duly
42 executed and authorized (and acknowledged if necessary for recordation) (the
43 “**LRA Parcels 1 and 2 Closing Documents**”):

44
45 6.4.1 Parcels 1 and 2 Note.

AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

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1
2 6.4.2 Acceptance of Deeds in the forms set forth in Exhibit G-1
3 and Exhibit G-2.

4
5 6.4.3 Amendment No. 1 to the LIFOC.

6
7 6.4.4 Acceptance of the Bill of Sale for the Navy Personal
8 Property conveyed to the LRA for such Parcel(s), in substantially the form
9 set forth in Exhibit K-1.

10
11 6.4.5 Acceptance of any necessary access and other required
12 easements and rights of way, if any are required.

13
14 6.4.6 Such additional documents as may be required to record the
15 Deeds, easements, or other documents under this Agreement or by Puerto
16 Rico law.

17
18 6.4.7 Representation to the Navy, in substantially the form set
19 forth in Exhibit L-2, stating that as of the date of Closing, the LRA has the
20 full capacity, right, power, and authority to execute, deliver, and perform
21 this Agreement pursuant hereto for the Closing, unless subsequently
22 prohibited by law.”

23
24 **Article 4. Survival and Benefit**

25
26 a. Unless defined separately, the terms used in this Amendment No. 1 shall be the
27 same as used and defined in the EDC Agreement.

28
29 b. Except as set forth herein, and unless modified specifically by this Amendment
30 No. 1, the terms and conditions contained in the EDC Agreement shall remain binding upon the
31 Parties and their respective successors and assigns as set forth in the EDC Agreement.

32
33 **Article 5. Exhibits**

34
35 Attached hereto and made a part of this Amendment No. 1 are the following attachments:

36
37 Attachment 1 Exhibit B to EDC Agreement
38 Attachment 2 Exhibit B-1 to EDC Agreement
39 Attachment 3 Exhibit B-4 to EDC Agreement
40 Attachment 4 Additions to Exhibit C to EDC Agreement
41 Attachment 5 Exhibit F-1 to EDC Agreement

42
43 **[Signatures on the Following Page]**
44
45

AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

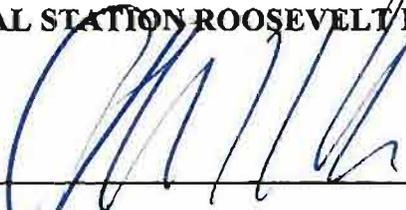
Page 9.

1 **In Witness Whereof**, the Parties, intending to be legally bound, have caused their duly
2 authorized representatives to execute and deliver this Amendment No. 1 as of the date first above
3 written.
4

5 **UNITED STATES OF AMERICA,**
6 **Acting by and through the Department of the Navy**
7
8

9
10 
11 _____
12 Gregory C. Preston
13 Real Estate Contracting Officer
14
15

16 **LOCAL REDEVELOPMENT AUTHORITY**
17 **FOR NAVAL STATION ROOSEVELT ROADS**
18
19

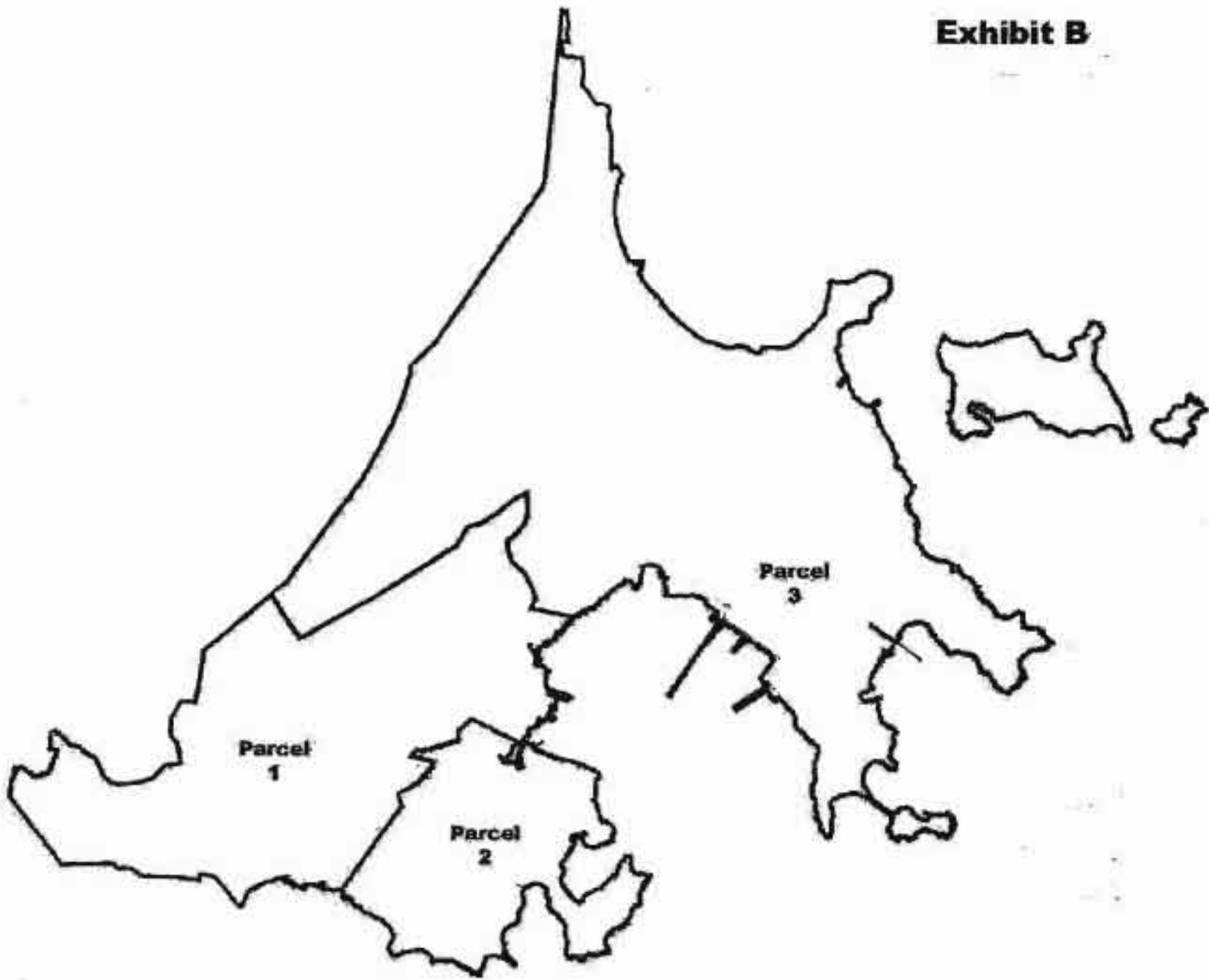
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21 _____
22 John Regis
23 Interim Executive Director

AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

ATTACHMENT 1

**Exhibit B to the EDC Agreement
Description of Property**

Exhibit B

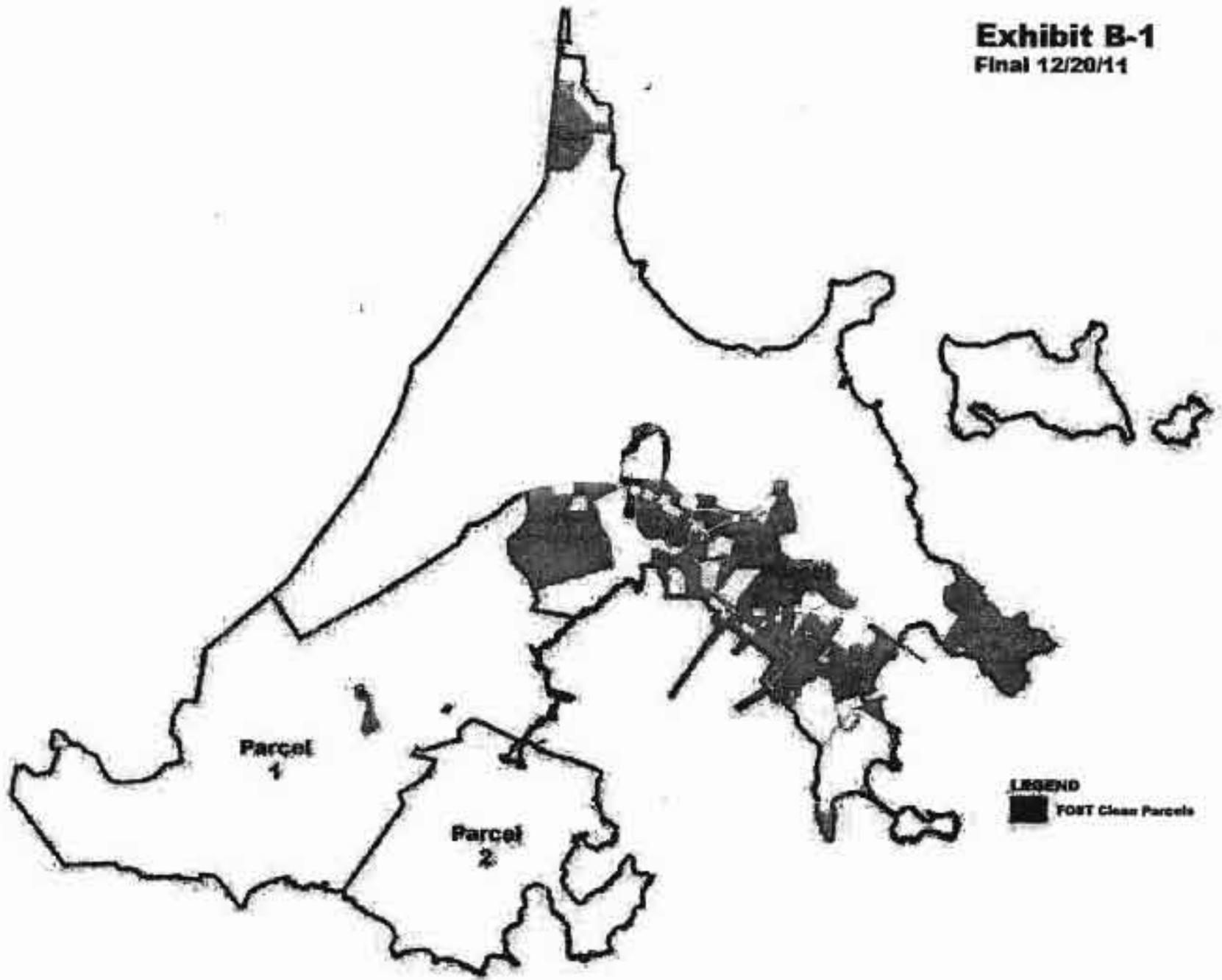


AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

ATTACHMENT 2

**Exhibit B-1 to the EDC Agreement
Clean Parcel**

Exhibit B-1
Final 12/20/11



LEGAL DESCRIPTION FOR SALE PARCEL I A

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'MANATT' and having a northing of 791059.1339 and an easting of 921490.5759 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL I A". Thence N40°26'39"W 2045.54' to point # 26-43 a 2" pipe found, the True Point of Beginning, having a northing of 792,615.8677 and an easting of 920,163.6158:

Thence N89°19'32"W 978.33' to point # AR-3 a 2" pipe found;
Thence N71°00'16"W 130.50' to point # AR-4 a 2" pipe found;
Thence N57°58'26"W 79.35' to point # AR-5 a 2" pipe found;
Thence N42°47'56"W 65.85' to point # AR-6 a 2" pipe found;
Thence N56°11'26"W 131.08' to point # SCN-C5 a 2" pipe found;
Thence N56°07'36"W 81.13' to point # SCN-C4 a 2" pipe found;
Thence N73°55'56"W 64.38' to point # SCN-C3 a 2" pipe found;
Thence N85°06'36"W 166.84' to point # SCN-C2 an iron rod set;
Thence S66°29'24"W 28.10' to point # SCN-C1 a 2" pipe found;
Thence S85°48'54"W 133.49' to point # 114 a 2" pipe found;
Thence N78°37'06"W 74.67' to point # 110 a 2" pipe found;
Thence N36°58'36"W 158.99' to point # 107 a 2" pipe found;
Thence N29°57'56"W 54.20' to point # 109 a 2" pipe found;
Thence S88°03'44"W 358.46' to an iron rod set;
Thence N15°12'47"E 54.17' to an iron rod set;
Thence N10°34'42"W 91.78' to an iron rod set;
Thence S83°43'09"W 222.44' to an iron rod set;
Thence N11°22'22"W 548.80' to an iron rod set;
Thence N81°20'53"E 391.79' to an iron rod set;
Thence N32°25'40"W 217.55' to an iron rod set;
Thence N83°41'47"W 717.92' to an iron rod set;
Thence S89°50'53"W 244.89' to an iron rod set;
Thence N11°06'26"E 123.28' to an iron rod set;
Thence N74°18'13"E 79.62' to an iron rod set;
Thence N41°30'37"E 410.17' to an iron rod set;
Thence N04°18'45"E 132.39' to an iron rod set;
Thence N21°43'36"W 148.72' to an iron rod set;
Thence N56°08'19"W 1097.24' to an iron rod set;
Thence N72°25'35"W 824.78' to an iron rod set;
Thence N54°58'40"W 628.94' to an iron rod set;
Thence N12°30'34"E 202.42' to point # F85-10 a 2" pipe found;
Thence N09°22'44"E 77.71' to point # N-PL-1-A an iron rod set;
Thence S56°25'46"E 143.44' to point # N-58-A a 2" pipe found;
Thence N37°49'53"E 101.30' to point # 58 an iron rod set;
Thence N52°22'24"E 27.21' to point # PL-2 an iron rod set;
Thence S51°57'26"E 539.85' to point # PL-3 an iron rod set;
Thence N75°36'24"E 456.65' to point # PL-4 a 2" pipe found;
Thence N20°35'13"E 801.21' to point # PL-5 an 8" concrete fence post found;
Thence N82°35'36"W 230.00' to point # PL-6 an iron rod set;
Thence N01°18'34"E 525.27' to point # PL-7 a 2" pipe found;
Thence N67°17'34"E 167.99' to point # PL-8 a 8" concrete fence post found;
Thence S58°23'36"E 226.77' to point # PL-9 a 2" pipe found;
Thence S41°00'16"E 406.89' to point # PL-10 an iron rod set;
Thence S77°42'16"E 316.92' to point # PL-11 an iron rod set;
Thence S40°51'06"E 257.74' to point # PL-12 a 8" concrete fence post found;
Thence S68°30'46"E 359.57' to point # PL-13 an iron rod set;
Thence S26°54'16"E 733.46' to point # PL-14 an iron rod set;

Thence S47°00'46"E 258.16' to point # PL-15 an iron rod set;
Thence S76°44'46"E 265.45' to point # PL-16 an iron rod set;
Thence N84°41'44"E 805.00' to point # PL-17 an iron rod set;
Thence N64°49'14"E 360.96' to point # PL-18 an iron rod set;
Thence N45°37'44"E 529.92' to point # PL-19 an iron rod set;
Thence N81°02'14"E 391.16' to point # PL-20 an iron rod set;
Thence N66°11'04"E 128.31' to point # PL-21-E a 8" concrete fence post found;
Thence S07°23'37"E 110.15' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 290.24', chord bearing of
N60°50'32"E

Radius=784.61'

Arc=291.92'

Thence S31°18'42"E 1235.12' to an iron rod set;
Thence N89°31'57"E 971.84' to an iron rod set;
Thence S26°07'48"W 830.15' to an iron rod set;
Thence S15°34'55"E 161.03' to an iron rod set;
Thence S09°38'10"W 138.52' to an iron rod set;
Thence S27°40'16"W 126.84' to an iron rod set;
Thence S43°10'40"W 143.52' to an iron rod set;
Thence S60°56'27"W 164.43' to an iron rod set;
Thence S72°38'10"W 155.86' to an iron rod set;
Thence S85°40'08"W 36.17' to an iron rod set;
Thence N60°31'49"W 57.39' to an iron rod set;
Thence N38°22'55"W 95.89' to an iron rod set;
Thence N28°50'18"W 46.13' to an iron rod set;
Thence N28°14'11"W 117.18' to an iron rod set;
Thence N50°04'49"W 165.20' to an iron rod set;
Thence S87°57'20"W 195.91' to an iron rod set;
Thence S57°51'11"W 248.88' to an iron rod set;
Thence S74°46'28"W 140.72' to an iron rod set;
Thence S07°43'22"E 105.67' to an iron rod set;
Thence S32°01'24"E 805.95' to an iron rod set;
Thence S30°07'40"E 55.68' to an iron rod set;
Thence S45°14'12"E 320.47' to an iron rod set;
Thence S22°18'51"E 147.92' to an iron rod set;
Thence S02°06'09"E 95.02' to an iron rod set;
Thence S71°27'43"W 135.81' to an iron rod set;
Thence S01°18'44"E 165.75' to an iron rod set;
Thence N84°32'30"W 185.80' to point # 8 an iron rod set;
Thence S00°05'23"W 196.16' to point # 9 an iron rod found;
Thence N83°34'06"W 820.00' to point # 26-43 a 2" pipe found, the True Point of Beginning.

Said parcel containing 16,056,268.3 square feet or 368.601 acres, which equates to 1,491,682.2 square meters or 379.525 cuerdas.

Said parcel is subject to the following easement as shown on plat titled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 21" prepared by TranSystems Corporation and sealed by Luis Berríos Montes on XX, 2007.

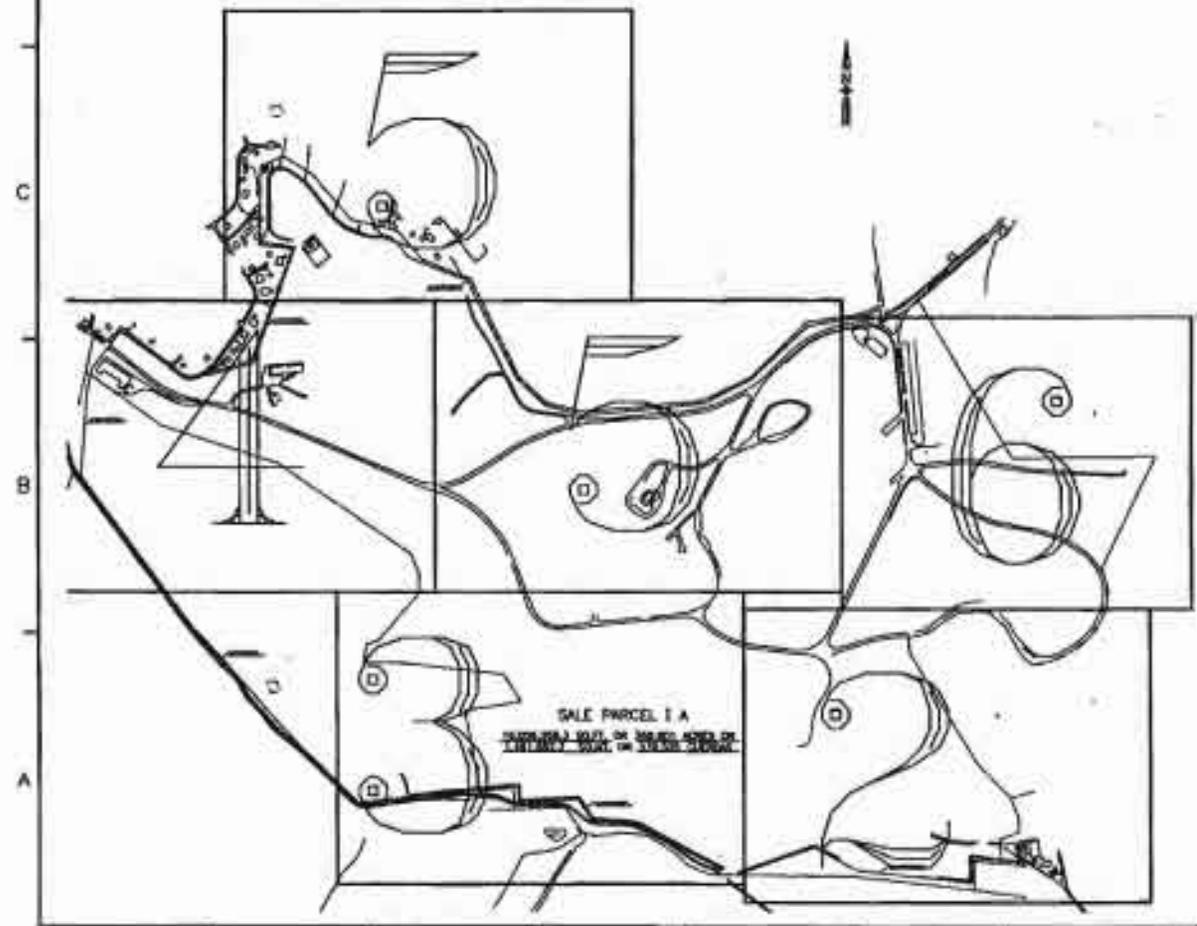
SURVEY NOTES

1. RECONNAISSANCE SURVEY PERFORMED BY TRANSMISSION CORPORATION FROM FIELD DATA COLLECTED IN 1958 AND 1959. FIELD INSTRUMENTS, CALCULATIONS AND FINAL PLOT HAVE BEEN REVIEWED FOR CORRECTNESS BY LAW OFFICERS EMPLOYED BY THE U.S. NAVAL ACTIVITY.
2. NUMERICAL COORDINATE MARKS SHOWN ON THIS AND OTHER PLOTS IN THE PLANNING REGULATIONS SHOW EXACT PLANNING COORDINATE SYSTEM AND BY (UNIT MEASUREMENT). NUMERICAL COORDINATES WERE OBTAINED FROM DATA PROVIDED BY THE BUREAU AND ARE SET FORTH IN ADDITION TO THE SURVEY INSTRUMENTS (SEE APPENDIX) PLANNED (SEE APPENDIX) SURVEYING (SEE APPENDIX) AND BY SECTION (SEE APPENDIX).
3. THE FOLLOWING PLOTS AND NOTES WERE USED TO DETERMINE THE BOUNDARY LINES AS SHOWN ON THIS PLOT:
 - (a) PLOT THREE "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT REDEVELOPMENT SURVEY" PERFORMED BY TRANSMISSION CORPORATION AND LAW OFFICERS EMPLOYED, NAVAL ACTIVITY, PUEERTO RICO, FEBRUARY 15, 1958.
 - (b) PLANNING DATA AND BOUNDARY LINES PROVIDED BY BUREAU (SEE APPENDIX) PLANNING, U.S. NAVAL ACTIVITY, PUEERTO RICO, FEBRUARY 15, 1958.
 - (c) PLOT THREE "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT REDEVELOPMENT SURVEY" PERFORMED BY TRANSMISSION CORPORATION AND LAW OFFICERS EMPLOYED, NAVAL ACTIVITY, PUEERTO RICO, FEBRUARY 15, 1958.
4. NOTE: THIS PLOT SHOWS COORDINATES OF BOUNDARY LINES IN THE UNIT MEASUREMENT SYSTEM. THE PLOT DOES NOT SHOW ALL GRADES OR ELEVATIONS THAT COULD AFFECT SURVEY POINTS.

CERTIFICATION

I, LAW OFFICER [Signature], CERTIFY THAT THE INFORMATION THIS PLOT IS CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF. I HAVE REVIEWED THE PLOT AND THE FIELD DATA AND INSTRUMENTS USED IN THE SURVEY AND I HAVE FOUND NO ERRORS OR OMISSIONS.

DATE: 1/15/60
 SIGNATURE: [Signature]
 TITLE: [Title]
 OFFICE: [Office]

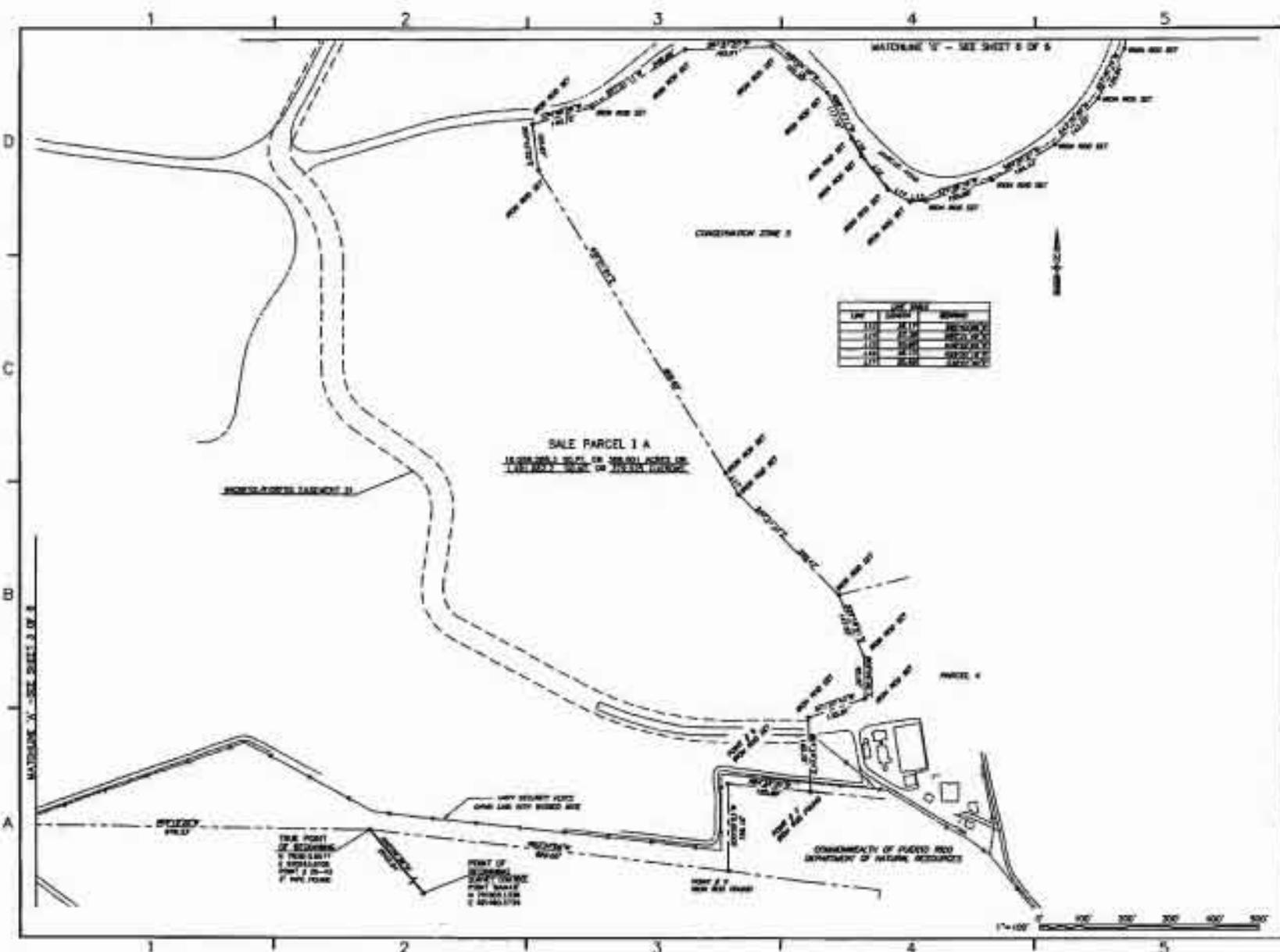


LEGEND

- BOUNDARY LINES
- PROPERTY LINES
- ROAD LINES



<p>Trall Systems</p> <p>1000 N. 10th St., Suite 100 San Juan, P.R. 00906 Phone: (787) 734-1111 Fax: (787) 734-1112 www.trallsystems.com</p>	
<p>ATLANTA: JOHNSON</p>	<p>FORMER NAVAL STATION ROOSEVELT REDEVELOPMENT SURVEY</p>
<p>SALE PARCEL I A</p>	<p>FORMER NAVAL STATION ROOSEVELT REDEVELOPMENT SURVEY</p>



LINE	DATE	BY	REVISION
1	10/1/00
2
3
4
5

Trail Systems
 10000 ...
 ...
 ...

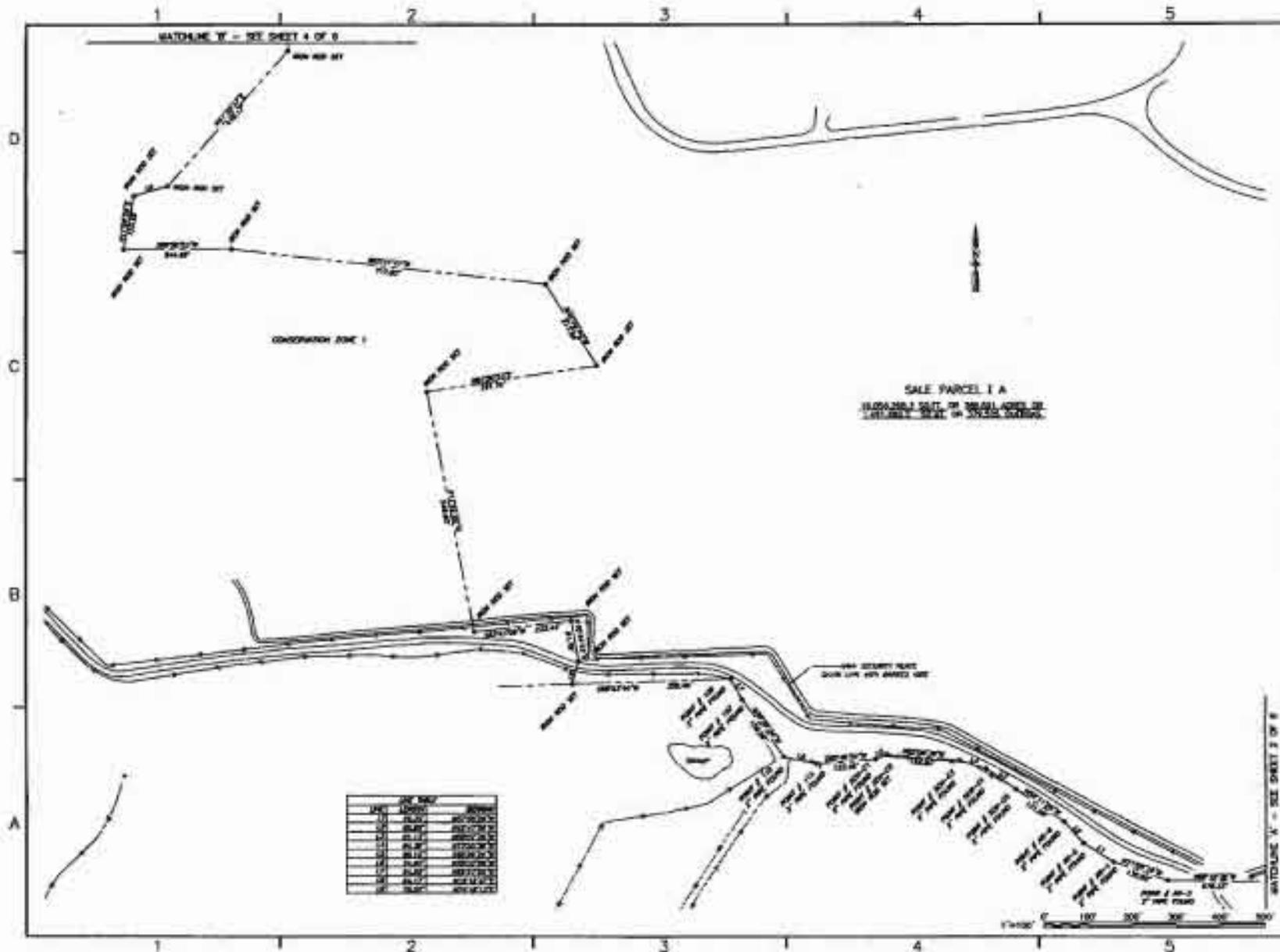
SALE PARCEL 1 A

UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT BOARDS
 SALE PARCEL 1 A

1"=100'

MATCHLINE X - SEE SHEET 3 OF 4

MATCHLINE Y - SEE SHEET 4 OF 4



BATDLINK W - SEE SHEET 4 OF 9

CONCRETE ROAD I

SALE PARCEL I A
 BOUNDARY SET BY DEED AND DEED
 TO THE WEST LINE OF SAID SCHOOL

NO.	TYPE	WIDTH	DEPTH
1	WATER	12"	12"
2	SEWER	12"	12"
3	GAS	12"	12"
4	WATER	12"	12"
5	SEWER	12"	12"
6	GAS	12"	12"
7	WATER	12"	12"
8	SEWER	12"	12"
9	GAS	12"	12"
10	WATER	12"	12"
11	SEWER	12"	12"
12	GAS	12"	12"
13	WATER	12"	12"
14	SEWER	12"	12"
15	GAS	12"	12"
16	WATER	12"	12"
17	SEWER	12"	12"
18	GAS	12"	12"
19	WATER	12"	12"
20	SEWER	12"	12"
21	GAS	12"	12"
22	WATER	12"	12"
23	SEWER	12"	12"
24	GAS	12"	12"
25	WATER	12"	12"
26	SEWER	12"	12"
27	GAS	12"	12"
28	WATER	12"	12"
29	SEWER	12"	12"
30	GAS	12"	12"

ATLANTIC SHEDDEN
 1000 W. 10th St. Norfolk, VA 23502
 TEL: 757/637-1111
 FAX: 757/637-1112
 WWW.ATLANTICSHEDDEN.COM

DEED, PLATS AND
 OTHER RECORDS
 1000 W. 10th St. Norfolk, VA 23502
 TEL: 757/637-1111
 FAX: 757/637-1112
 WWW.ATLANTICSHEDDEN.COM

SALE PARCEL I A

ATLANTIC SHEDDEN
 1000 W. 10th St. Norfolk, VA 23502
 TEL: 757/637-1111
 FAX: 757/637-1112
 WWW.ATLANTICSHEDDEN.COM

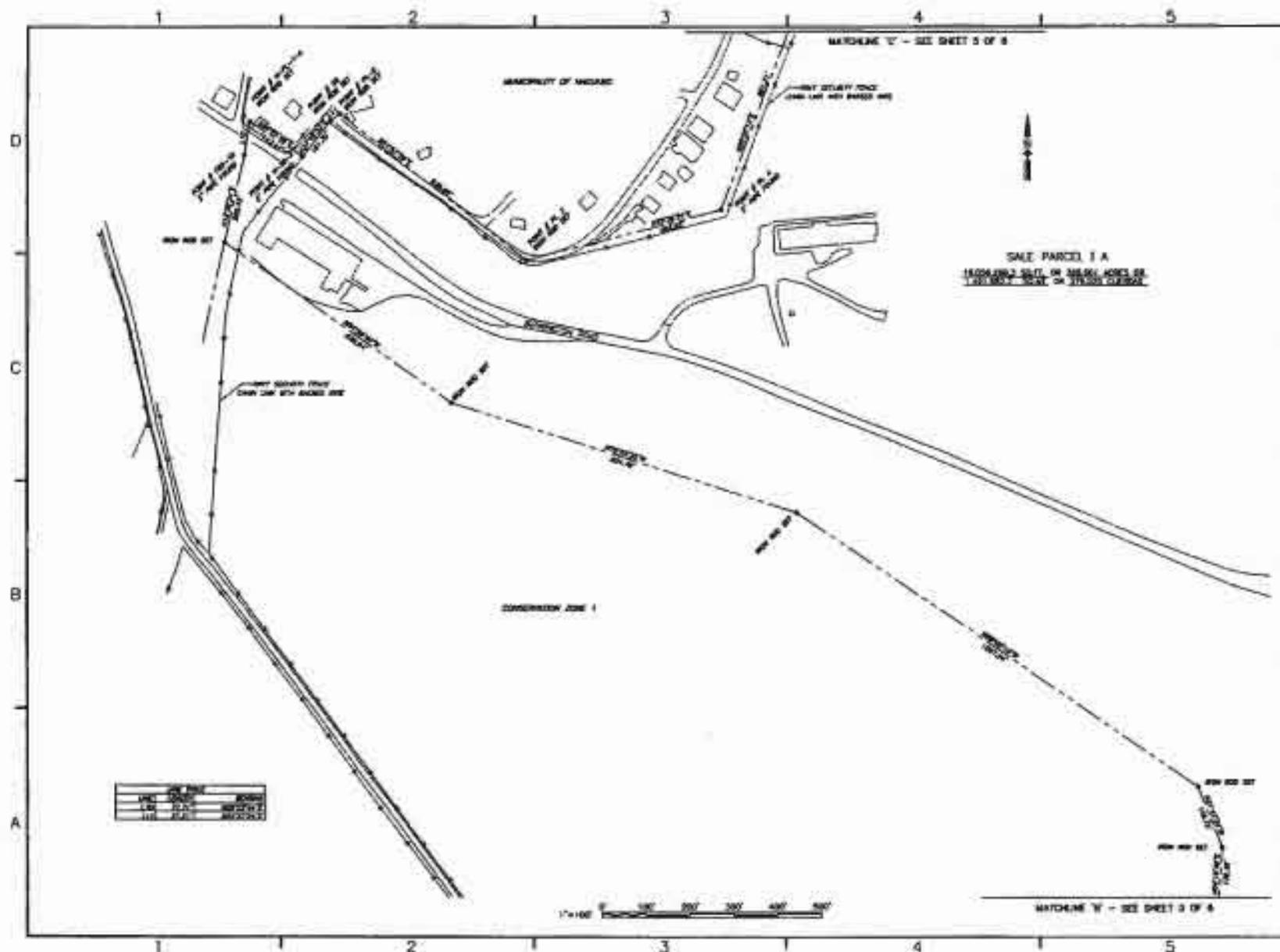
SALE PARCEL I A

ATLANTIC SHEDDEN
 1000 W. 10th St. Norfolk, VA 23502
 TEL: 757/637-1111
 FAX: 757/637-1112
 WWW.ATLANTICSHEDDEN.COM

SALE PARCEL I A



BATDLINK W - SEE SHEET 3 OF 9



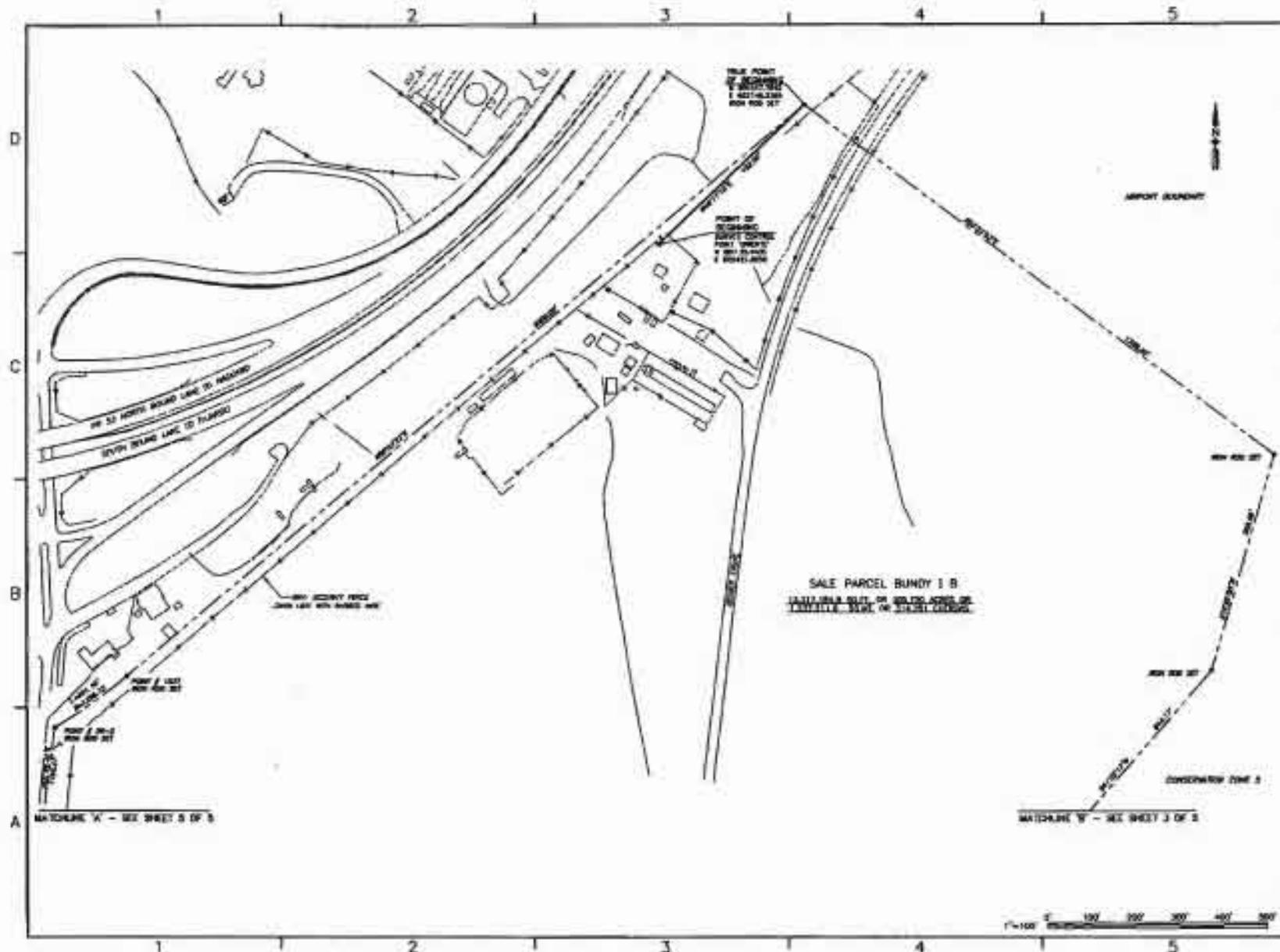
DATE	NO. OF SHEETS	TOTAL SHEETS
1/18/00	1	1
1/18/00	1	1

TranSystems
 10000 W. 10th Ave., Suite 100
 Denver, CO 80202
 Phone: 303.755.1111
 Fax: 303.755.1112
 www.transystems.com

PROJECT NO. 00-000000-0000
 SHEET NO. 1 OF 1
 DATE: 1/18/00

DESIGNED BY: []
 CHECKED BY: []
 APPROVED BY: []

CLIENT: ATLANTIC DIVISION
 NAVAL AVIATION PORTFOLIO AND
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROAD
SALE PARCEL I A



THIS POINT IS BOUNDARY BETWEEN THE 100' WIDE ROAD AND THE 40' WIDE ROAD

POINT OF BEGINNING OF THE 100' WIDE ROAD

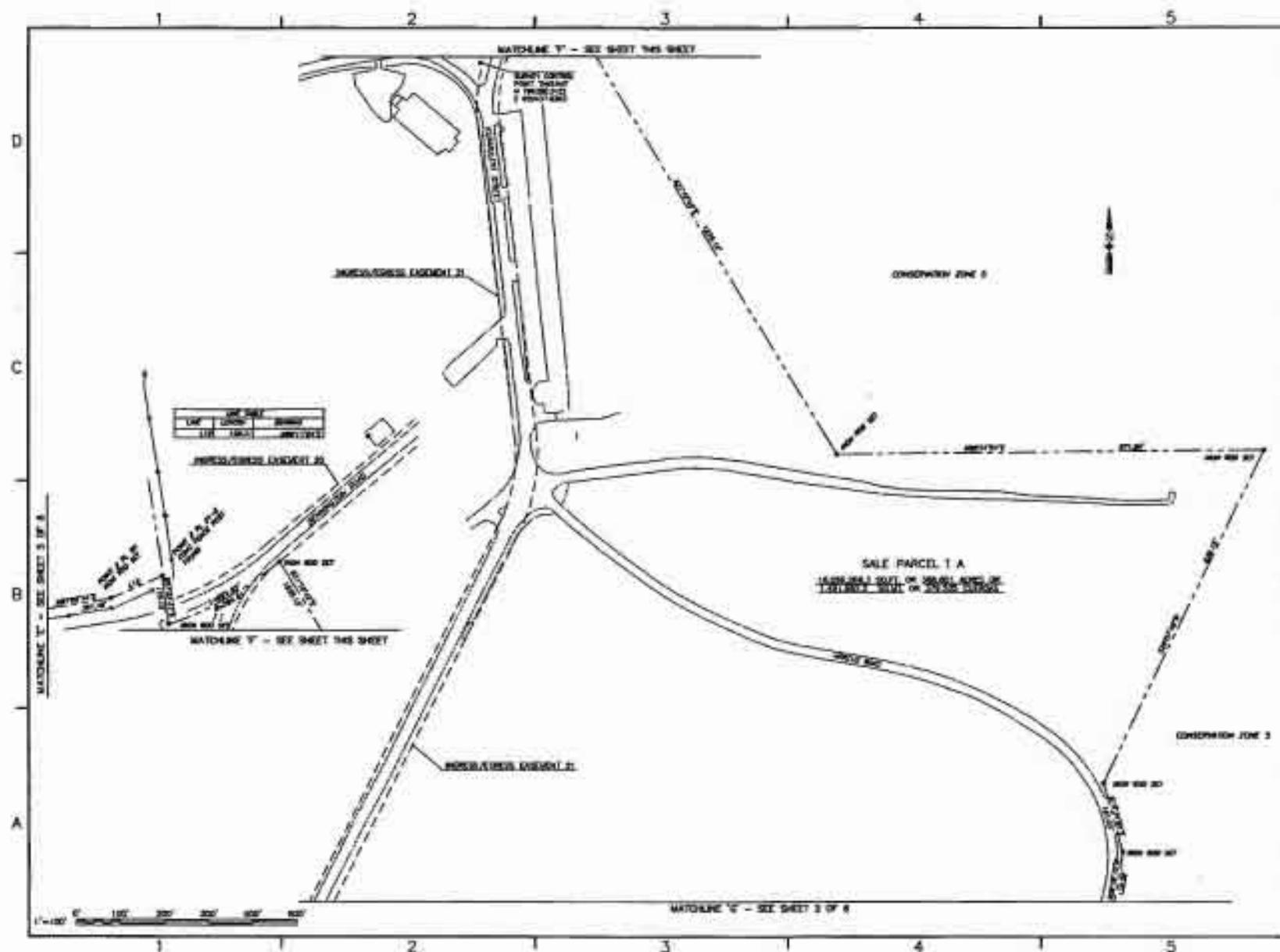
SALE PARCEL BUNDY I B
 (PART OF THE 100' WIDE ROAD AND THE 40' WIDE ROAD)

MATCHLINE V - SEE SHEET 3 OF 5

MATCHLINE W - SEE SHEET 5 OF 5



ATLANTIC DIVISION 1000 N. 1st St., Suite 100 NORFOLK, VA 23510 (757) 261-1111 (757) 261-1112 www.civilsystems.com	SALE PARCEL BUNDY I B FORMER NAVAL STATION ROOSEVELT ROAD
DATE: 10/1/00 DRAWN BY: J. J. BROWN CHECKED BY: J. J. BROWN APPROVED BY: J. J. BROWN	SHEET NO. 5 OF 5



1400-241 SOUTH OF BRIDGE AVENUE PORTLAND, OREGON 97201 TEL: 503-241-1111 FAX: 503-241-1112 WWW.IRASYSTEMS.COM	
ATLANTIC DIVISION 1400-241 SOUTH OF BRIDGE AVENUE PORTLAND, OREGON 97201 UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD SALE PARCEL 1 A	
DATE: 10/1/00 DRAWN BY: J. J. JONES CHECKED BY: J. J. JONES APPROVED BY: J. J. JONES SCALE: AS SHOWN SHEET NO. 145 OF 145	1 2 3 4 5

LEGAL DESCRIPTION FOR SALE PARCEL I B

Beginning at a survey control point in the Ward of Quebrada Seca, said point being a brass disk set in concrete. Said point known as "ORIENTE" and having a northing of 801135.4435 and an easting of 922421.5250 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL I B". Thence N46°17'15"E 452.00' to an iron rod set, the True Point of Beginning, having a northing of 801447.7942 and an easting of 922748.2399:

Thence S53°33'53"E 1328.52' to an iron rod set;

Thence S16°22'05"W 503.09' to an iron rod set;

Thence S41°32'17"W 844.17' to an iron rod set;

Thence N86°41'17"E 490.81' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 538.16', chord bearing of S86°52'24"E

Radius=2399.52'

Arc=539.29'

Thence S80°26'05"E 993.54' to an iron rod set;

Thence S02°53'40"W 616.35' to an iron rod set;

Thence S88°24'10"W 274.90' to an iron rod set;

Thence S23°45'53"W 834.54' to an iron rod set;

Thence S64°08'30"W 251.08' to an iron rod set;

Thence S29°02'16"W 491.78' to an iron rod set;

Thence S54°35'01"W 839.86' to an iron rod set;

Thence S53°26'25"W 1513.27' to an iron rod set;

Thence N34°50'01"W 1559.49' to an iron rod set;

Thence S71°02'38"W 49.22' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 502.10', chord bearing of N25°12'28"W

Radius=2305.39'

Arc=503.09'

Thence N31°27'34"W 205.67' to an iron rod set;

Thence N37°31'33"W 108.52' to an iron rod set;

Thence N50°48'31"W 139.62' to an iron rod set;

Thence N60°18'21"W 244.86' to an iron rod set;

Thence N36°15'07"W 195.19' to point # PL 21, an iron rod set;

Thence S89°15'16"E 438.16' to point # PL 22, an iron rod set;

Thence N11°14'04"E 508.56' to point # 26-3A, an iron rod set;

Thence N07°56'34"E 1154.41' to point # 26-3, an iron rod set;

Thence following a curve to point # 1537, an iron rod set with a long chord of 200.91', chord bearing of N54°23'31"E

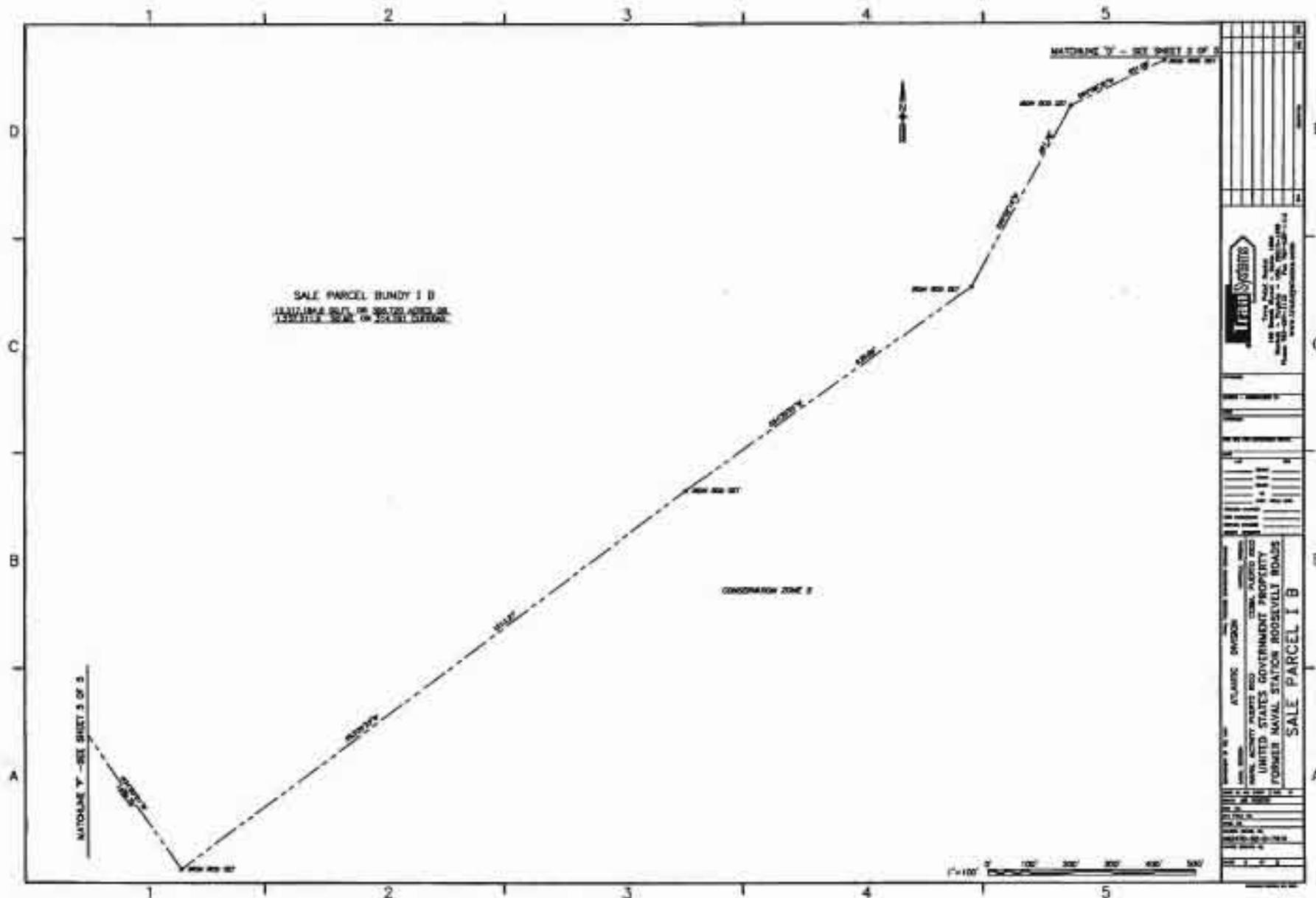
Radius=1328.73'

Arc=201.10'

Thence N50°03'22"E 2000.00' to an iron rod set, the True Point of Beginning.

Said parcel containing 13,317,184.8 square feet or 305.720 acres, which equates to 1,237,211.9 square meters or 314.781 cuerdas.

Said parcel is subject to an easement as shown on plat titled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 19" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on November 21, 2007.



SALE PARCEL BUNDY I B
 (ALL DIMENSIONS ARE IN FEET AND DECIMALS THEREOF UNLESS OTHERWISE NOTED)

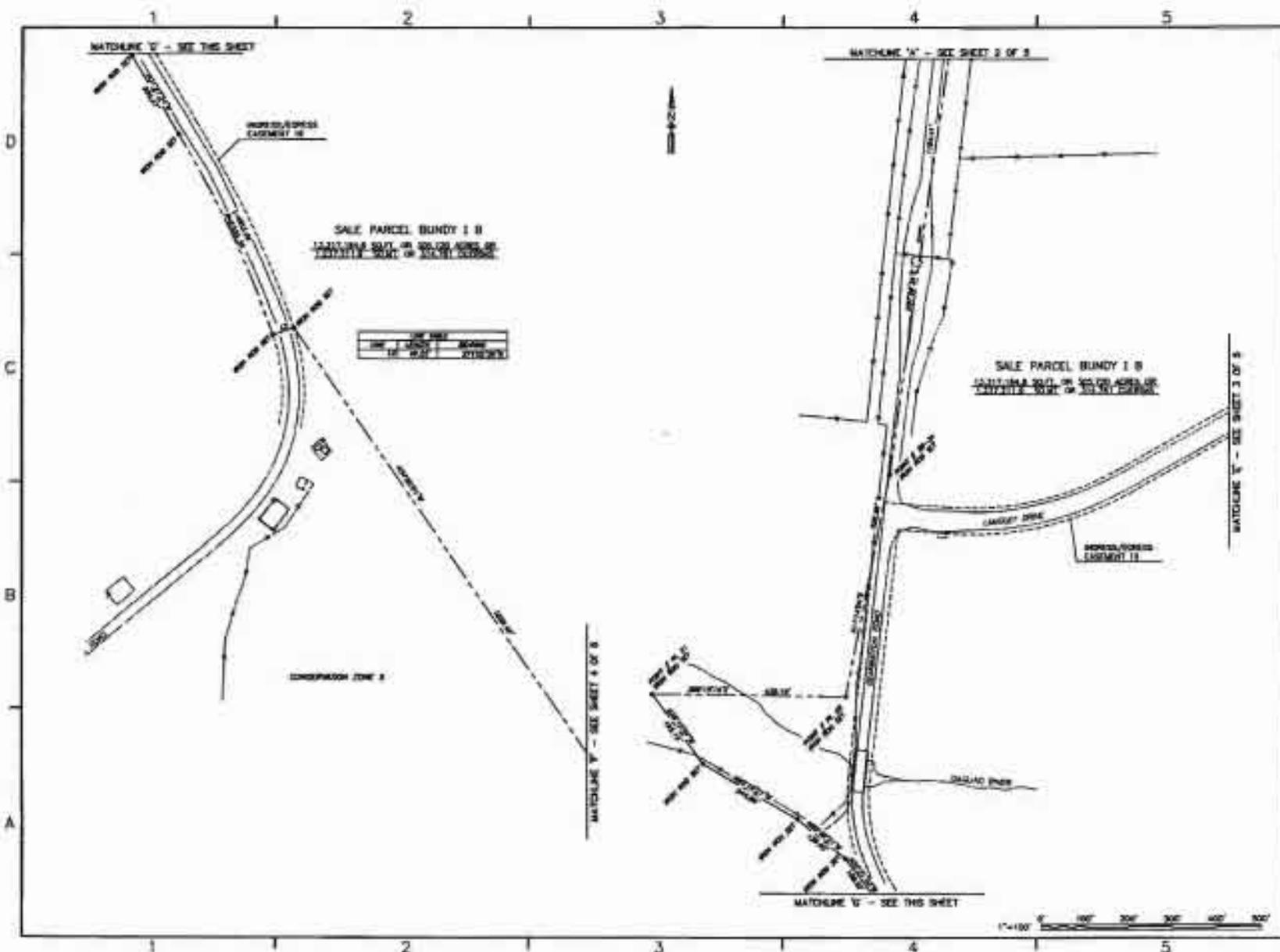
CONDOMINIUM ZONE 1

MATCHLINE Y - SEE SHEET 3 OF 3

MATCHLINE Y - SEE SHEET 3 OF 3



PROJECT NO. 100-100-100-100 DATE: 10/10/10 DRAWN BY: J. J. J. CHECKED BY: K. K. K. APPROVED BY: L. L. L. www.transystems.com	
ATLANTIC DIVISION FEDERAL ACQUISITION SERVICE REGISTRATION NO. 100-100-100-100 UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELL BOARDS SALE PARCEL I B	
SHEET NO. 100-100-100-100 OF 100-100-100-100 SHEETS DATE: 10/10/10 DRAWN BY: J. J. J. CHECKED BY: K. K. K. APPROVED BY: L. L. L.	



LINE	TYPE	THICKNESS
1	PROPERTY	0.005
2	RIGHT-OF-WAY	0.010
3	ADJACENT	0.015

PROJECT NO. 100-100-100-100 SHEET NO. 100-100-100-100 DATE 10/10/10	
SALE PARCEL I B	
PROJECT NO. 100-100-100-100 SHEET NO. 100-100-100-100 DATE 10/10/10	ATLANTIC DIVISION CIVIL ENGINEERING 100-100-100-100
UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS	



LEGAL DESCRIPTION FOR SALE PARCEL I C

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL I C". Thence S56°59'10"W 3237.44' to an iron rod set, the True Point of Beginning, having a northing of 794882.8719 and an easting of 925035.1777:

Thence S52°51'27"W 793.46' to an iron rod set;
Thence N55°04'11"W 258.80' to an iron rod set;
Thence N15°50'45"E 1816.59' to an iron rod set;
Thence N29°31'51"E 2302.04' to an iron rod set;
Thence N33°17'01"E 365.97' to an iron rod set;
Thence S21°18'51"E 140.50' to an iron rod set;
Thence S71°15'39"E 36.09' to an iron rod set;
Thence S03°34'41"E 655.97' to an iron rod set;
Thence S25°14'38"W 320.45' to an iron rod set;
Thence S35°23'56"W 1311.93' to an iron rod set;
Thence S07°51'08"W 1583.99' to an iron rod set, the True Point of Beginning.

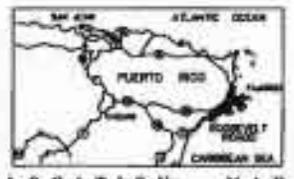
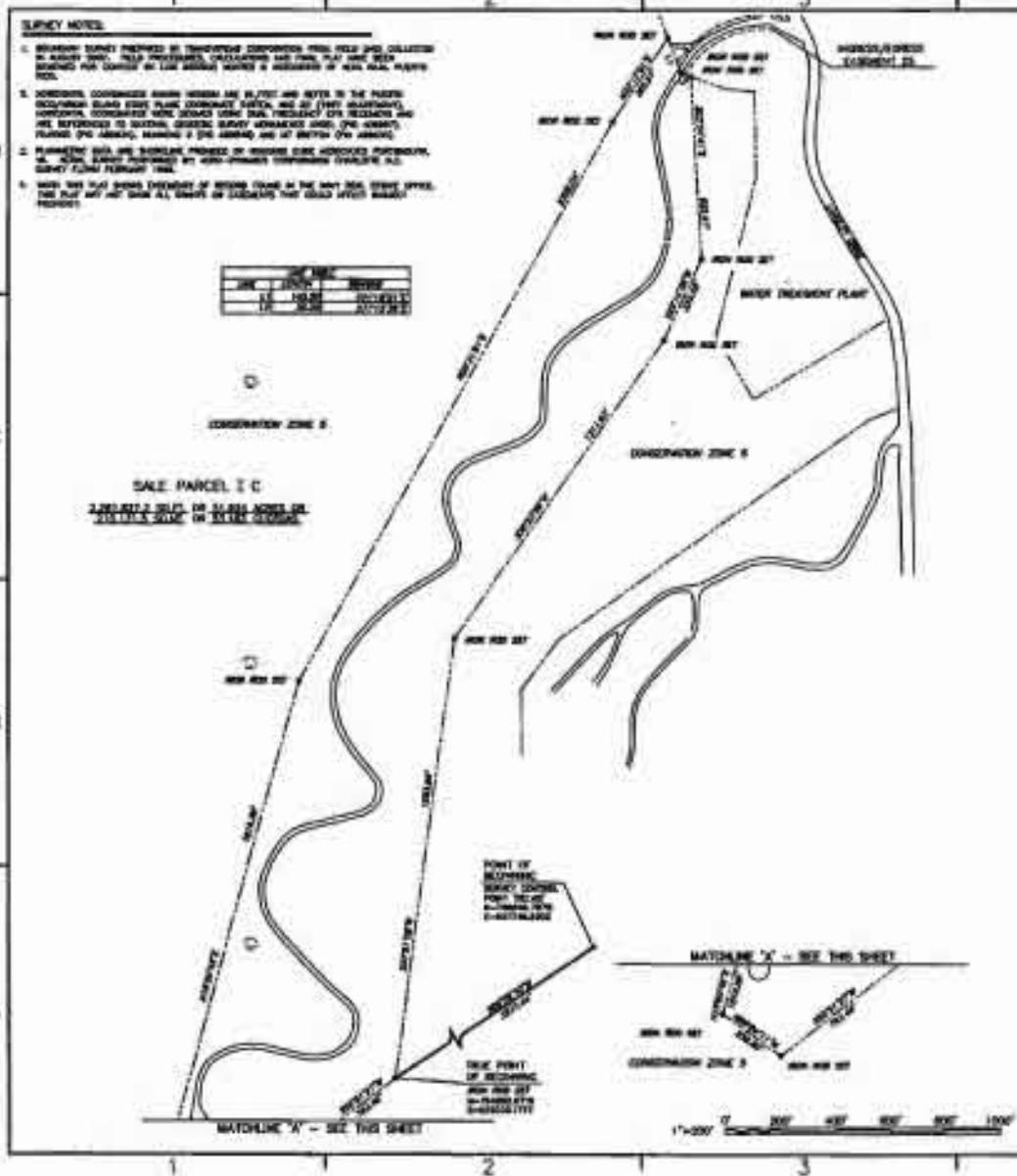
Said parcel containing 2,261,827.2 square feet or 51.924 acres, which equates to 210,131.5 square meters or 53.463 cuerdas.

SURVEY NOTES

1. SURVEY STAKES PLACED BY SURVEYOR CORPORATION FIELD FILE AND COLLECTED IN BUREAU FILE. FIELD INSTRUMENTS, CALCULATIONS AND DATA FILED HAVE BEEN REVIEWED FOR CORRECTNESS BY THE SURVEYOR GENERAL'S OFFICE AND FOUND TO BE CORRECT.
2. SURVEYOR CORPORATION HAS BEEN ADVISED BY THE PUBLIC RECORDS DIVISION THAT THE PLANNING BOARD HAS APPROVED THE PLANNING BOARD'S PLAN FOR THE PROPOSED CONSTRUCTION OF THE CONCRETE BRIDGE OVER THE RIVER. THE PLANNING BOARD HAS REFERENCED TO SEVERAL SURVEY ADVISORIES AND THE ADVISORY PLANS (THE ADVISORY, DRAWING 2 (THE BRIDGE AND AT BRIDGE (THE ADVISORY)).
3. PLANNING BOARD HAS BEEN ADVISED BY SURVEYOR CORPORATION THAT THE PLANNING BOARD HAS APPROVED THE PLANNING BOARD'S PLAN FOR THE PROPOSED CONSTRUCTION OF THE CONCRETE BRIDGE OVER THE RIVER. THE PLANNING BOARD HAS REFERENCED TO SEVERAL SURVEY ADVISORIES AND THE ADVISORY PLANS (THE ADVISORY, DRAWING 2 (THE BRIDGE AND AT BRIDGE (THE ADVISORY)).
4. THERE ARE NO OTHER SURVEY INSTRUMENTS OR RECORDS IN THE BUREAU FILE THAT AFFECT THIS PLAN AND THE SURVEYOR GENERAL'S OFFICE HAS REVIEWED THE SURVEY INSTRUMENTS THAT AFFECT THIS PLAN.

SCALE	INCHES	FEET
1/4"	3	36
1/8"	6	72
1/16"	12	144

SALE PARCEL I C
 2.00 ACRES ± SUBD. IN BLOCK 1000 OF
 "MAYFAIR GOLF & COUNTRY CLUB"



LOCATION MAP
NOT TO SCALE



NAVAL ACTIVITY PUERTO RICO
NOT TO SCALE

LEGEND
 CONCRETE BRIDGE FROM
 NON RES SET
 PROPERTY LINE
 EASEMENT LINE

MATCHLINE 'X' - SEE THIS SHEET



1"=200'



CERTIFICATION

I, THE SURVEYOR GENERAL, CERTIFY THAT THE INFORMATION CONTAINED HEREIN IS CORRECT AND THAT THE SURVEYOR CORPORATION HAS BEEN ADVISED BY THE PUBLIC RECORDS DIVISION THAT THE PLANNING BOARD HAS APPROVED THE PLANNING BOARD'S PLAN FOR THE PROPOSED CONSTRUCTION OF THE CONCRETE BRIDGE OVER THE RIVER.

DATE: 10/15/2010
 SURVEYOR GENERAL: [Signature]
 OFFICE: SAN JUAN, P.R.

TRISYS
 1000 N. RIVER ST. SUITE 100
 SAN JUAN, P.R. 00907
 TEL: 787.754.1111
 WWW.TRISYS.COM

SALE PARCEL I C

10/15/2010

LEGAL DESCRIPTION
SALE PARCEL I D

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DOG' and having a northing of 805443.8964 and an easting of 933110.4735 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL I D". Thence S79°51'07"W 1568.79' to an iron rod set, the True Point of Beginning, having a northing of 805167.4912 and an easting of 931566.2267:

Thence S02°46'27"E 590.00' to an iron rod set;
Thence S05°53'40"W 271.67' to an iron rod set;
Thence S29°31'45"W 194.85' to an iron rod set;
Thence S39°30'31"W 232.03' to an iron rod set;
Thence S45°30'46"W 496.11' to an iron rod set;
Thence S07°23'02"W 253.47' to an iron rod set;
Thence S20°25'28"E 446.10' to an iron rod set;
Thence S45°57'09"E 649.51' to an iron rod set;
Thence S27°14'03"E 434.71' to an iron rod set;
Thence S19°58'29"E 96.01' to an iron rod set;
Thence S21°17'11"E 166.07' to an iron rod set;
Thence S16°28'24"E 198.53' to an iron rod set;
Thence S43°11'29"W 174.48' to an iron rod set;
Thence S19°31'06"W 146.30' to an iron rod set;
Thence S79°34'23"E 1457.64' to a point not set, said point referenced by a 2" pipe set at the edge of the mangroves bearing S79°34'23"E 40.93';
Thence Southwest 1481' from said point not set, along the approximate edge of water of Ensenada Honda to a point not set, said point referenced by a 2" pipe with a northing of 800054.0594 and an easting of 932165.0410 set at the edge of mangroves and bearing S44°03'52"E 162.91' from point not set;
Thence from said point not set, N44°03'52"W 581.55' to an iron rod set;
Thence N32°10'38"W 212.43' to an iron rod set;
Thence N59°52'22"W 176.42' to an iron rod set;
Thence S04°17'25"W 234.59' to an iron rod set;
Thence S23°14'43"W 386.08' to an iron rod set;
Thence S39°11'40"W 94.84' to an iron rod set;
Thence S47°10'22"W 239.01' to an iron rod set;
Thence S63°53'18"W 442.91' to an iron rod set;
Thence S43°59'47"W 463.19' to an iron rod set;
Thence S14°44'58"E 199.54' to an iron rod set;
Thence N75°15'02"E 110.43' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 394.07', chord bearing of S88°16'14"E
 Radius=694.61'
 Arc=399.55'
Thence S71°32'28"E 1543.06' to an iron rod set;
Thence N25°50'42"E 45.93' to a 2" pipe set at the approximate edge of water of Ensenada Honda;
Thence Southeast along the approximate edge of water of Ensenada Honda;
Thence Southwest along the approximate edge of water of Ensenada Honda 2250' to a 2" pipe set having a northing of 797111.1030 and an easting of 931373.0768;
Thence N63°38'46"W 1745.64' to an iron rod set;
Thence S48°34'58"W 613.72' to an iron rod set;
Thence S10°14'29"E 293.26' to an iron rod set;
Thence S72°32'16"W 1288.66' to an iron rod set;
Thence N59°48'07"W 125.93' to an iron rod set;
Thence S30°14'21"W 293.69' to an iron rod set;

Thence S75°02'51"E 675.18' to an iron rod set;
Thence S17°59'43"W 176.84' to an iron rod set;
Thence S39°44'38"W 324.94' to an iron rod set;
Thence S45°30'15"W 342.88' to an iron rod set;
Thence S54°39'50"W 500.21' to an iron rod set;
Thence S63°54'50"W 207.12' to an iron rod set;
Thence N25°23'08"W 219.99' to an iron rod set;
Thence N21°18'50"W 259.43' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 358.79', chord bearing of N57°08'01"W
 Radius=309.52'
 Arc=382.71'
Thence following a curve to an iron rod set with a long chord of 499.41', chord bearing of N11°36'57"W
 Radius=1424.52'
 Arc=502.01'
Thence N01°31'13"W 874.38' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 336.85', chord bearing of N16°53'22"W
 Radius=635.48'
 Arc=340.93'
Thence N32°15'31"W 300.98' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 333.00', chord bearing of N13°33'58"W
 Radius=519.52'
 Arc=338.98'
Thence N05°07'35"E 113.24' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 267.55', chord bearing of N16°02'25"W
 Radius=370.48'
 Arc=273.73'
Thence N37°12'25"W 184.72' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 203.46', chord bearing of N45°06'13"W
 Radius=740.48'
 Arc=204.10'
Thence N49°48'46"E 163.61' to an iron rod set;
Thence N05°12'12"W 899.59' to an iron rod set;
Thence N02°39'18"W 348.58' to an iron rod set;
Thence N01°22'38"E 121.06' to an iron rod set;
Thence N13°42'21"E 58.26' to an iron rod set;
Thence N17°53'28"E 164.95' to an iron rod set;
Thence N25°10'41"E 453.12' to an iron rod set;
Thence N26°27'14"E 208.19' to an iron rod set;
Thence S89°20'10"W 430.55' to an iron rod set;
Thence N00°57'54"W 274.05' to an iron rod set;
Thence N61°07'31"E 496.76' to an iron rod set;
Thence N56°41'56"E 3256.05' to an iron rod set;
Thence N53°25'55"E 1445.50' to an iron rod set;
Thence N51°48'50"E 255.48' to an iron rod set;
Thence N50°58'22"E 234.13' to an iron rod set;
Thence N52°49'35"E 193.85' to an iron rod set;
Thence N53°57'58"E 184.34' to an iron rod set;
Thence N60°39'23"E 483.63' to an iron rod set, the True Point of Beginning.

Said parcel containing 34,113,952.4 square feet or 783.149 acres, which equates to 3,169,302.7 square meters or 806.357 cuerdas.

Said parcel SALE PARCEL I D does not include the following internal parcels:

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS BOWLING ALLEY". Thence N36°45'05"E 1804.73' to an iron rod set, the True Point of Beginning, having a northing of 798092.7913 and an easting of 928829.7380:

Thence following a curve to an iron rod set with a long chord of 186.10', chord bearing of N34°11'56"E

Radius=21850.79'

Arc=186.10'

Thence N34°18'35"E 163.30' to an iron rod set;

Thence S55°42'43"E 262.55' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 14.71', chord bearing of S10°38'54"E

Radius=10.39'

Arc=16.34'

Thence S34°24'56"W 337.39" to an iron rod set;

Thence N56°02'55"W 272.34' to an iron rod set, the True Point of Beginning;

Said parcel containing 95,112.3 square feet or 2.183 acres, which equates to 8,836.2 square meters or 2.248 cuerdas.

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "VETERANS HEALTH CLINIC". Thence N50°37'43"E 1,415.10' to an iron rod set, the True Point of Beginning, having a northing of 797544.4322 and an easting of 928843.8368:

Thence N34°24'56"E 458.65' to an iron rod set;

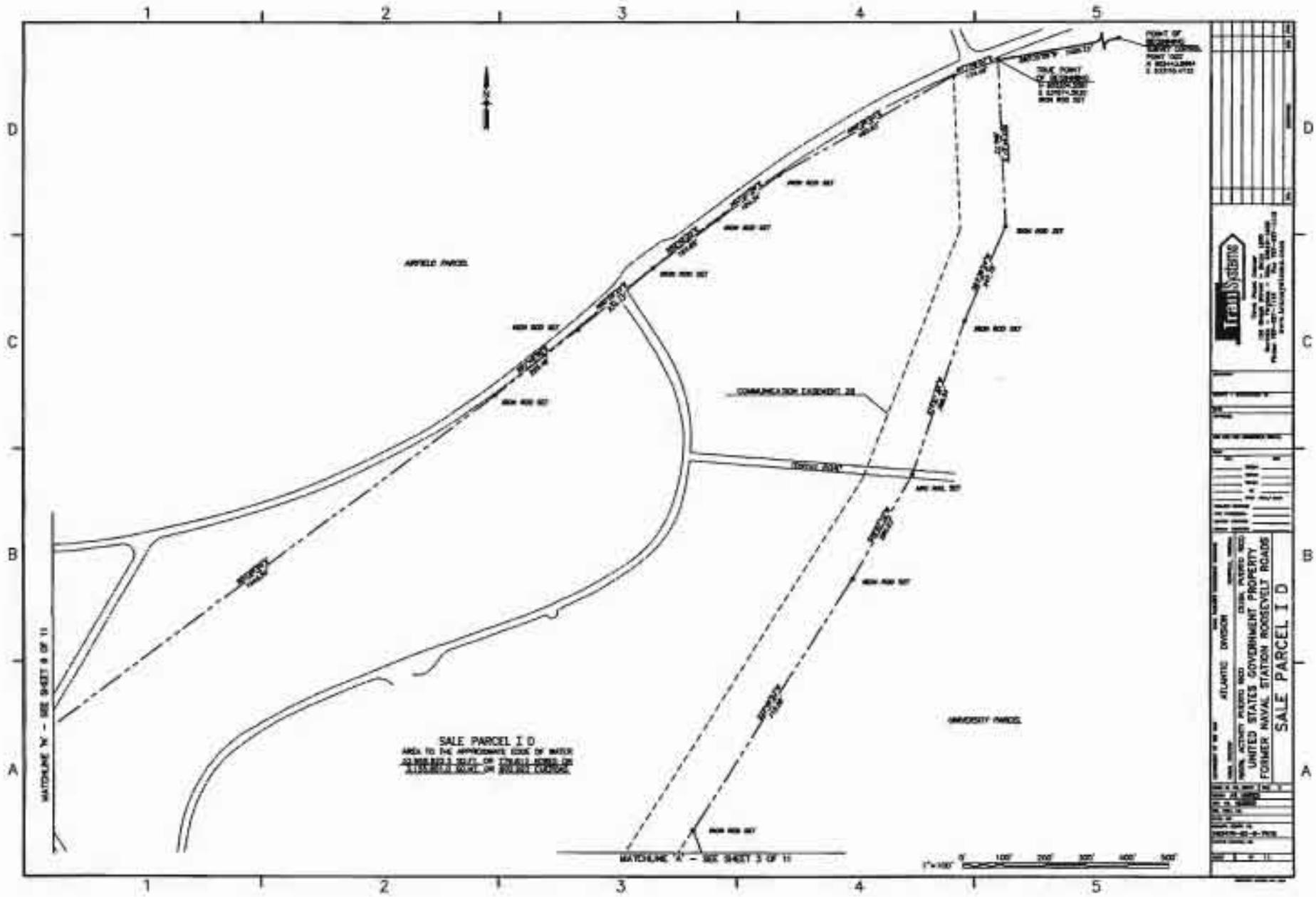
Thence S54°36'53"E 222.75' to an iron rod set;

Thence S34°51'57"W 455.75" to an iron rod set;

Thence N55°21'36"W 219.14' to an iron rod set, the True Point of Beginning.

Said parcel containing 101,012.8 square feet or 2.319 acres, which equates to 9,384.4 square meters or 2.388 cuerdas.

Said parcel SALE PARCEL I D is subject to multiple easements as shown on plats titled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 11" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on XXX 2007, "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 12" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on October 2, 2007 and "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 23" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on October 2, 2007.



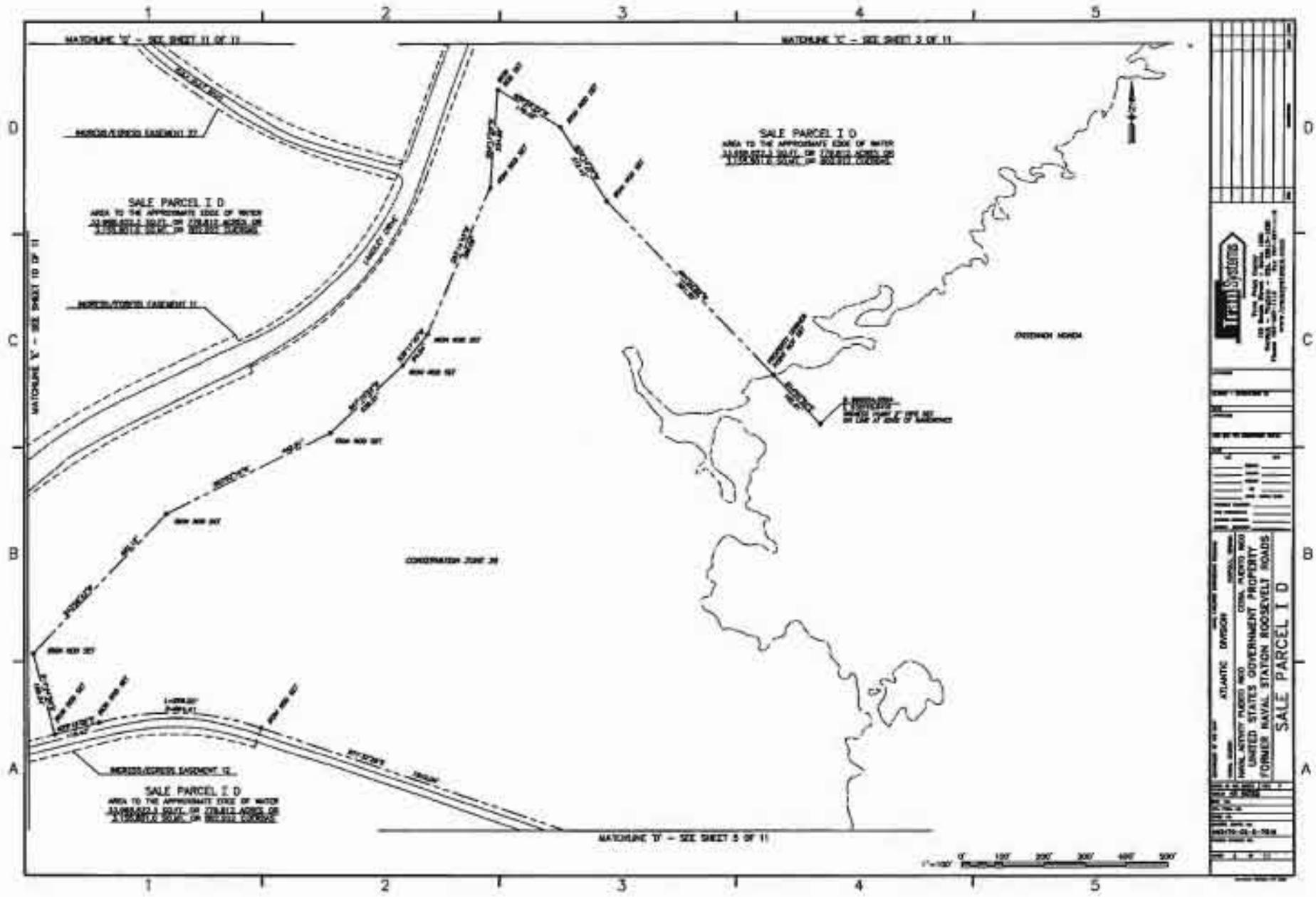
SALE PARCEL I D
 AREA TO THE APPROXIMATE COAST OF WATER
 AS SHOWN BY SURVEY OF COASTS AND GEODYSICAL SURVEY OF GREAT BRITAIN
 1:100,000 SCALE OF 1950

MATCHLINE 'N' - SEE SHEET 8 OF 11

MATCHLINE 'N' - SEE SHEET 3 OF 11

1" = 100'

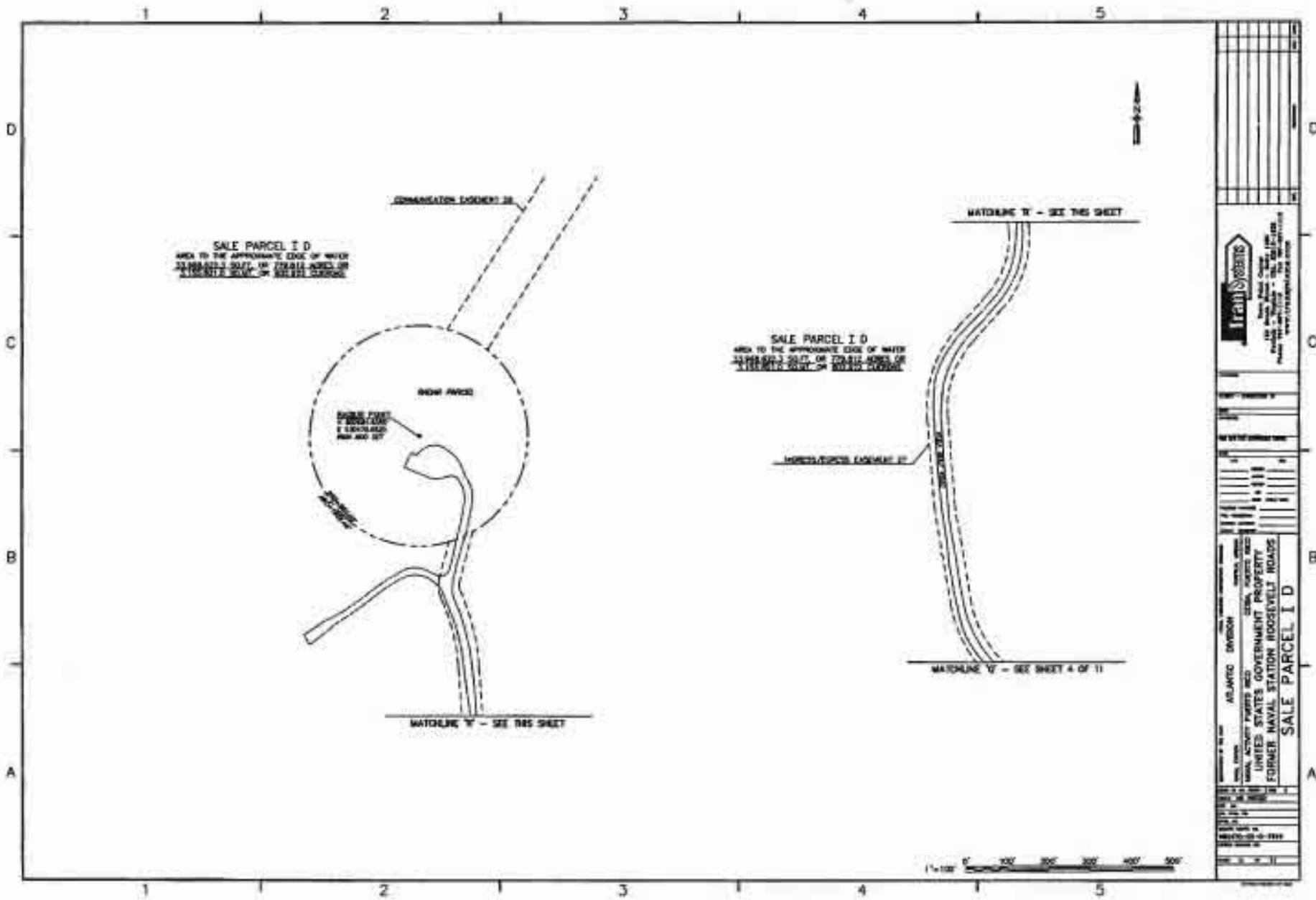
ATLANTIC DIVISION MILITARY ACTIVITY PLANNING BOARD UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL I D	
11/11/11	



Irish Systems
 1000 W. 10th St., Suite 100
 Omaha, NE 68107
 Phone: 402-441-1111 Fax: 402-441-1112
 www.irishsystems.com

ATLANTIC DIVISION
 MAINTENANCE DISTRICT NO. 1
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROADS
SALE PARCEL I D

DATE: 04-18-18
 DRAWN BY: [Name]
 CHECKED BY: [Name]



SALE PARCEL I D
 AREA TO THE APPROXIMATE EDGE OF WATER
 25 FEET WIDE ON EACH SIDE OF
 4 FEET WIDE ON EACH SIDE

COMMUNICATION CABLES

NEW PRICE

ROAD
 SIDEWALK

MATCHLINE V - SEE THIS SHEET

SALE PARCEL I D
 AREA TO THE APPROXIMATE EDGE OF WATER
 25 FEET WIDE ON EACH SIDE OF
 4 FEET WIDE ON EACH SIDE

MATCHLINE V - SEE THIS SHEET

COMMUNICATION CABLES

MATCHLINE V - SEE SHEET 4 OF 11

Irati Systems 100 S.	
ATLANTIC DIVISION	
UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL I D	
...	



LEGAL DESCRIPTION FOR SALE PARCEL II A

Beginning at a survey control point in the Ward of Guayscan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL II A". Thence S78°52'34"E 168.01' to an iron rod set, the True Point of Beginning, having a northing of 796614.3537 and an easting of 927914.7410:

Thence N30°14'21"E 293.69' to an iron rod set;
Thence S59°48'07"E 125.93' to an iron rod set;
Thence N72°32'16"E 1288.66' to an iron rod set;
Thence N74°27'25"E 368.85' to an iron rod set;
Thence N82°52'22"E 549.92' to an iron rod set;
Thence S61°50'10"E 134.71' to an iron rod set;
Thence S22°03'47"W 964.43' to an iron rod set;
Thence S26°10'48"W 599.37' to an iron rod set;
Thence N83°59'37"W 552.67' to an iron rod set;
Thence S08°53'31"W 1095.55' to an iron rod set;
Thence S31°33'42"E 191.95' to an iron rod set;
Thence S32°08'22"E 369.47' to an iron rod set;
Thence S55°21'55"E 113.66' to an iron rod set;
Thence N38°20'03"E 320.99' to an iron rod set;
Thence N84°57'17"E 52.20' to an iron rod set;
Thence S57°57'00"E 121.21' to an iron rod set;
Thence S52°41'53"E 85.04' to an iron rod set;
Thence N56°14'39"E 285.03' to an iron rod set;
Thence N07°36'22"W 171.77' to an iron rod set;
Thence N34°34'26"W 439.85' to an iron rod set;
Thence N33°05'48"E 315.39' to an iron rod set;
Thence N74°17'17"E 370.33' to an iron rod set;
Thence N34°27'48"E 342.62' to an iron rod set;
Thence S74°42'52"E 421.32' to an iron rod set;
Thence S71°43'47"E 304.80' to an iron rod set;
Thence S26°34'31"E 108.86' to an iron rod set;
Thence S31°21'54"W 200.39' to an iron rod set;
Thence N87°34'09"W 598.54' to an iron rod set;
Thence S24°04'28"E 568.33' to an iron rod set;
Thence S29°04'14"E 1361.02' to an iron rod set;
Thence S67°01'49"W 288.42' to an iron rod set;
Thence S00°03'09"W 542.55' to an iron rod set;
Thence S75°55'37"W 993.35' to an iron rod set;
Thence S30°47'30"E 382.86' to an iron rod set;
Thence S75°57'53"W 662.53' to an iron rod set;
Thence following a curve to an iron rod set; with a long chord of 118.97', a chord bearing of S13°32'47"E,
 Radius= 849.14'
 Arc=119.07'
Thence S09°31'46"E 282.37' to an iron rod set;
Thence following a curve to an iron rod set; with a long chord of 294.29', a chord bearing of S40°30'35"E,
 Radius= 285.86'
 Arc=309.13'
Thence N18°32'14"E 100.99' to an iron rod set;
Thence S85°13'10"E 27.97' to an iron rod set;

Thence S63°37'29"E 75.85' to an iron rod set;
Thence N86°01'31"E 190.34' to an iron rod set;
Thence S02°38'57"W 102.54' to an iron rod set;
Thence S29°40'44"E 33.82' to an iron rod set;
Thence N84°48'02"E 151.40' to an iron rod set;
Thence following a curve to an iron rod set; with a long chord of 241.06', a chord bearing of S70°36'19"E,

Radius= 289.61'

Arc=248.63'

Thence following a curve to an iron rod set; with a long chord of 530.38', a chord bearing of N84°01'47"E,

Radius= 346.39'

Arc=604.07'

Thence S55°55'45"E 49.22' to an iron rod set;

Thence S75°35'56"E 45.01' to an iron rod set;

Thence S75°35'56"E 12.13' to a point not set at the approximate edge of water of Ensenada Honda;

Thence South along the approximate edge of water of Ensenada Honda to an iron rod set having a northing of 791042.2146 and an easting of 931277.3202;

Thence N50°46'20"W 41.29' to an iron rod set;

Thence S72°51'34"W 246.04' to an iron rod set;

Thence S39°58'07"W 213.05' to an iron rod set;

Thence S16°11'23"W 131.78' to an iron rod set;

Thence S15°08'29"E 188.74' to an iron rod set;

Thence S04°39'50"E 252.60' to an iron rod set;

Thence S25°28'22"W 155.74' to an iron rod set;

Thence S36°13'57"E 93.83' to an iron rod set;

Thence S75°07'17"E 147.17' to an iron rod set;

Thence S54°12'38"E 196.35' to an iron rod set;

Thence S38°58'48"E 73.05' to an iron rod set;

Thence N62°43'26"E 43.54' to an iron rod set on the approximate edge of water of Ensenada Honda;

Thence Southeast along the approximate edge of water of Ensenada Honda;

Thence West along the approximate edge of water of Ensenada Honda;

Thence Southwest along the approximate edge of water of Ensenada Honda;

Thence Northwest along the approximate edge of water of Ensenada Honda to an iron rod set having a northing of 789987.0329 and an easting of 928624.5970;

Thence N33°49'58"E 147.58' to an iron rod set;

Thence N18°59'26"E 428.38' to an iron rod set;

Thence N19°29'17"E 152.84' to an iron rod set;

Thence N27°35'05"E 129.36' to an iron rod set;

Thence N59°07'38"W 128.07' to an iron rod set;

Thence N02°18'32"E 102.65' to an iron rod set;

Thence N52°52'48"W 47.94' to an iron rod set;

Thence N37°21'10"W 444.05' to an iron rod set;

Thence N20°16'57"W 69.58' to an iron rod set;

Thence N14°16'15"E 143.46' to an iron rod set;

Thence N03°18'13"W 222.24' to an iron rod set;

Thence S64°17'45"W 49.06' to an iron rod set;

Thence S30°25'00"W 86.93' to an iron rod set;

Thence S46°32'39"W 270.16' to an iron rod set;

Thence S86°09'24"W 107.23' to an iron rod set;

Thence N72°55'21"W 216.16' to an iron rod set;

Thence N36°01'23"W 145.33' to an iron rod set;

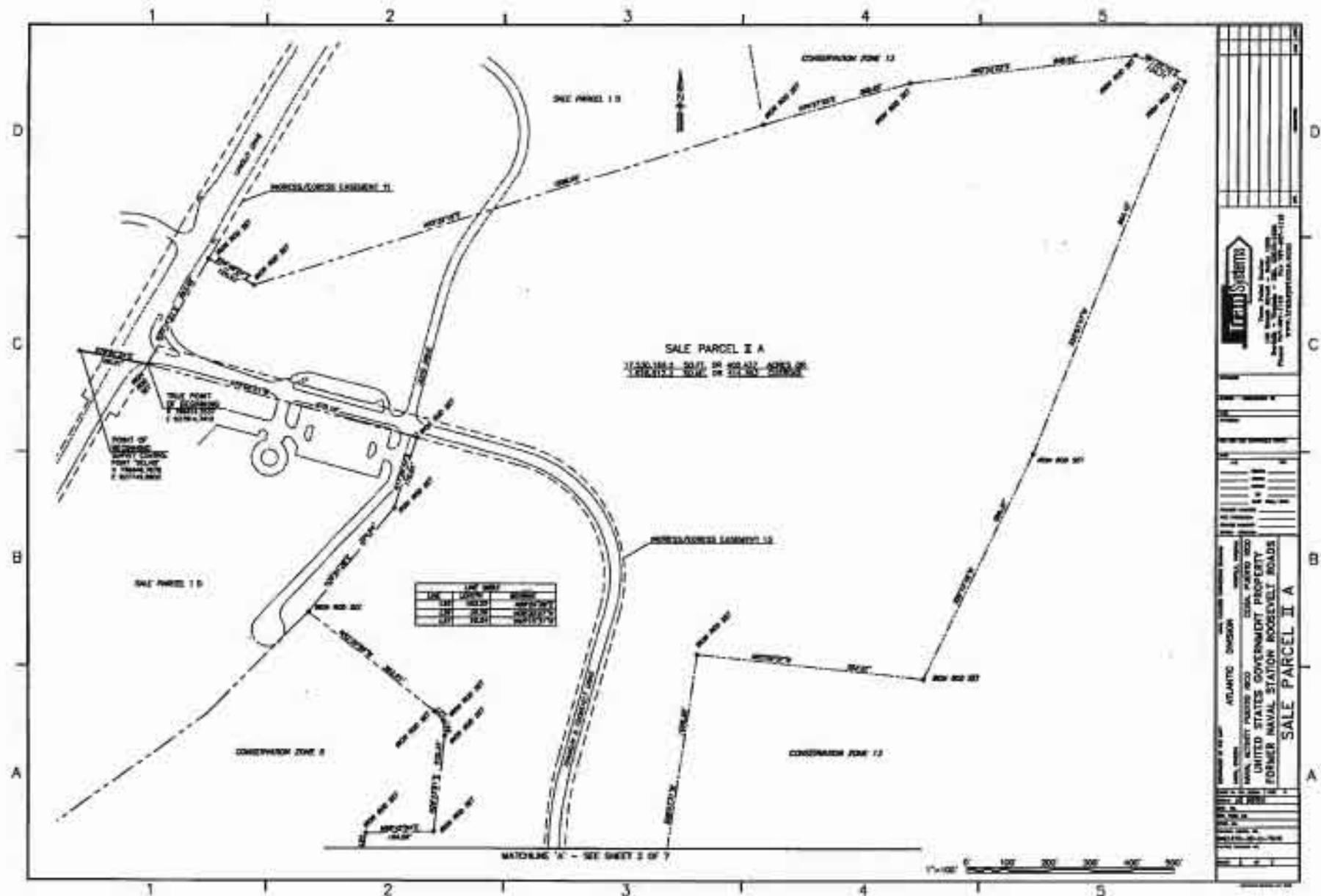
Thence N00°38'19"W 228.13' to an iron rod set;

Thence N22°32'18"E 188.66' to an iron rod set;

Thence N14°36'26"W 271.50' to an iron rod set;
Thence N70°04'01"W 817.68' to an iron rod set;
Thence N32°00'57"E 476.26' to an iron rod set;
Thence N28°46'50"E 376.98' to an iron rod set;
Thence N02°48'57"W 255.62' to an iron rod set;
Thence N35°21'48"E 166.29' to an iron rod set;
Thence N26°49'10"E 179.97' to an iron rod set;
Thence N70°58'06"W 132.88' to an iron rod set;
Thence N34°06'09"W 116.68' to an iron rod set;
Thence N03°28'14"E 162.01' to an iron rod set;
Thence N24°25'54"E 158.18' to an iron rod set;
Thence N68°44'45"E 156.42' to an iron rod set;
Thence N09°21'33"W 203.14' to an iron rod set;
Thence N44°54'44"E 185.85' to an iron rod set;
Thence N88°04'12"E 174.03' to an iron rod set;
Thence S71°43'46"E 46.11' to an iron rod set;
Thence S48°12'02"E 100.29' to an iron rod set;
Thence S34°04'11"E 219.49' to an iron rod set;
Thence S71°39'50"E 278.41' to an iron rod set;
Thence S38°39'51"E 182.04' to an iron rod set;
Thence N72°03'33"E 437.50' to an iron rod set;
Thence N47°27'11"W 627.34' to an iron rod set;
Thence N40°53'33"W 308.83' to an iron rod set;
Thence N09°24'38"E 492.22' to an iron rod set;
Thence N88°42'04"E 164.09' to an iron rod set;
Thence N06°33'51"E 232.33' to an iron rod set;
Thence N06°35'07"W 36.56' to an iron rod set;
Thence N45°15'31"W 29.84' to an iron rod set;
Thence N52°30'55"W 383.91' to an iron rod set;
Thence N39°44'38"E 324.94' to an iron rod set;
Thence N17°59'43"E 176.84' to an iron rod set;
Thence N75°02'51"W 675.18' to an iron rod set, the True Point of Beginning.

Said parcel containing 17,530,166.2 square feet or 402.437 acres, which equates to 1,628,612.3 square meters or 414.363 cuerdas.

Said parcel is subject to the following easements as shown on plats titled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 13" and "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 14" prepared by TrunSystems Corporation and sealed by Luis Berrios Montes on XX, 2007.



SALE PARCEL II A
 11,200,000 SQ. FT. IN 2000 ACRES OF
 1,000,000 SQ. FT. OF 25.00 ACRES

THE UNIT			
NO.	AREA	PERCENT	ACRES
1	11,200,000	100.00	25.00
2	11,200,000	100.00	25.00
3	11,200,000	100.00	25.00

ATLANTIC DESIGN
 1100 W. 10TH STREET, SUITE 200
 MIAMI, FL 33136
 TEL: 305-371-1111
 FAX: 305-371-1112
 WWW.ATLANTICDESIGN.COM

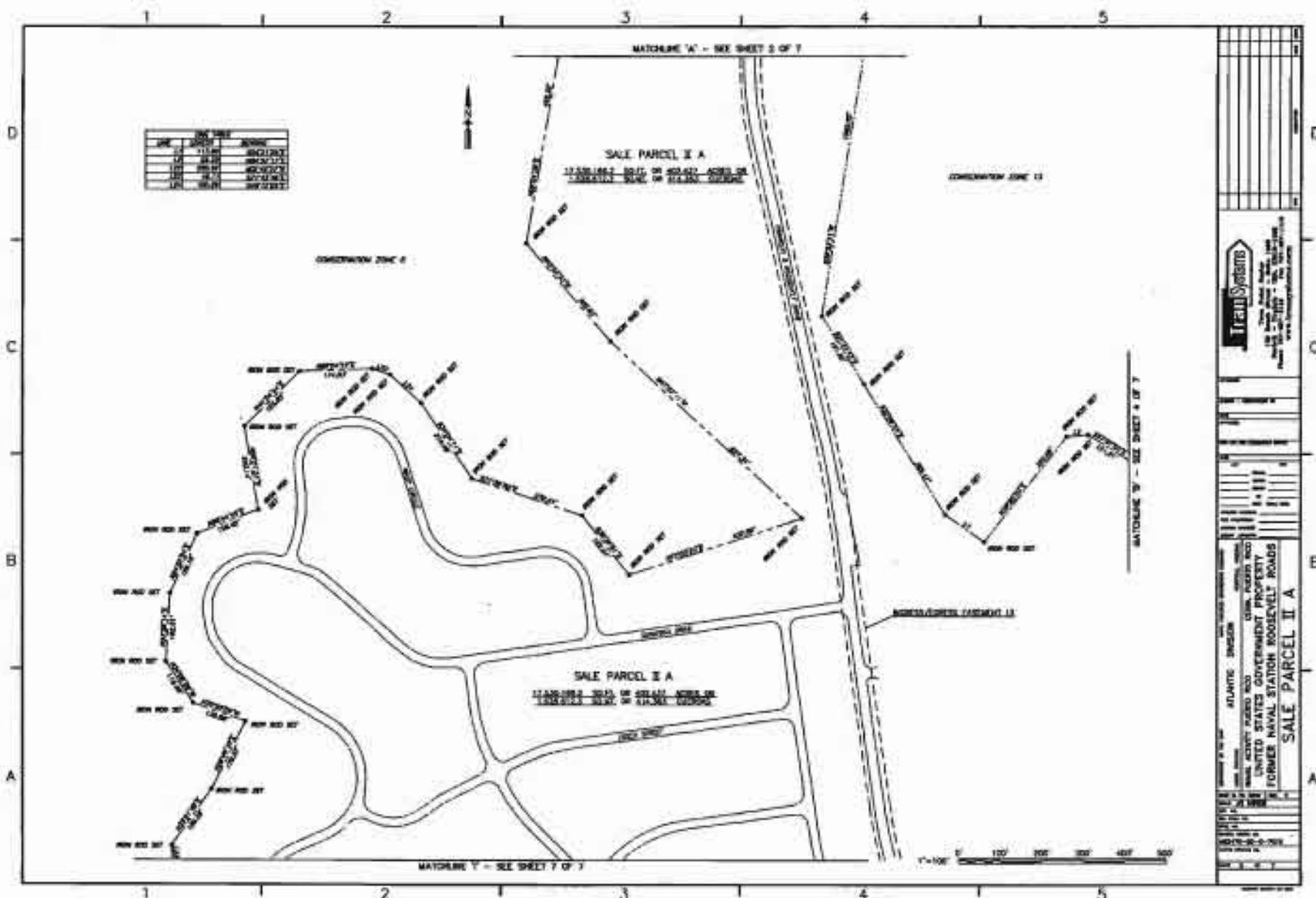
Trans Systems
 1100 W. 10TH STREET, SUITE 200
 MIAMI, FL 33136
 TEL: 305-371-1111
 FAX: 305-371-1112
 WWW.TRANSYSTEMS.COM

PROJECT NO. 00-0000-0000
 SHEET NO. 00-0000-0000
 DATE: 00/00/00

UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT BOARDS
SALE PARCEL II A

MATCHLINE 'X' - SEE SHEET 2 OF 7





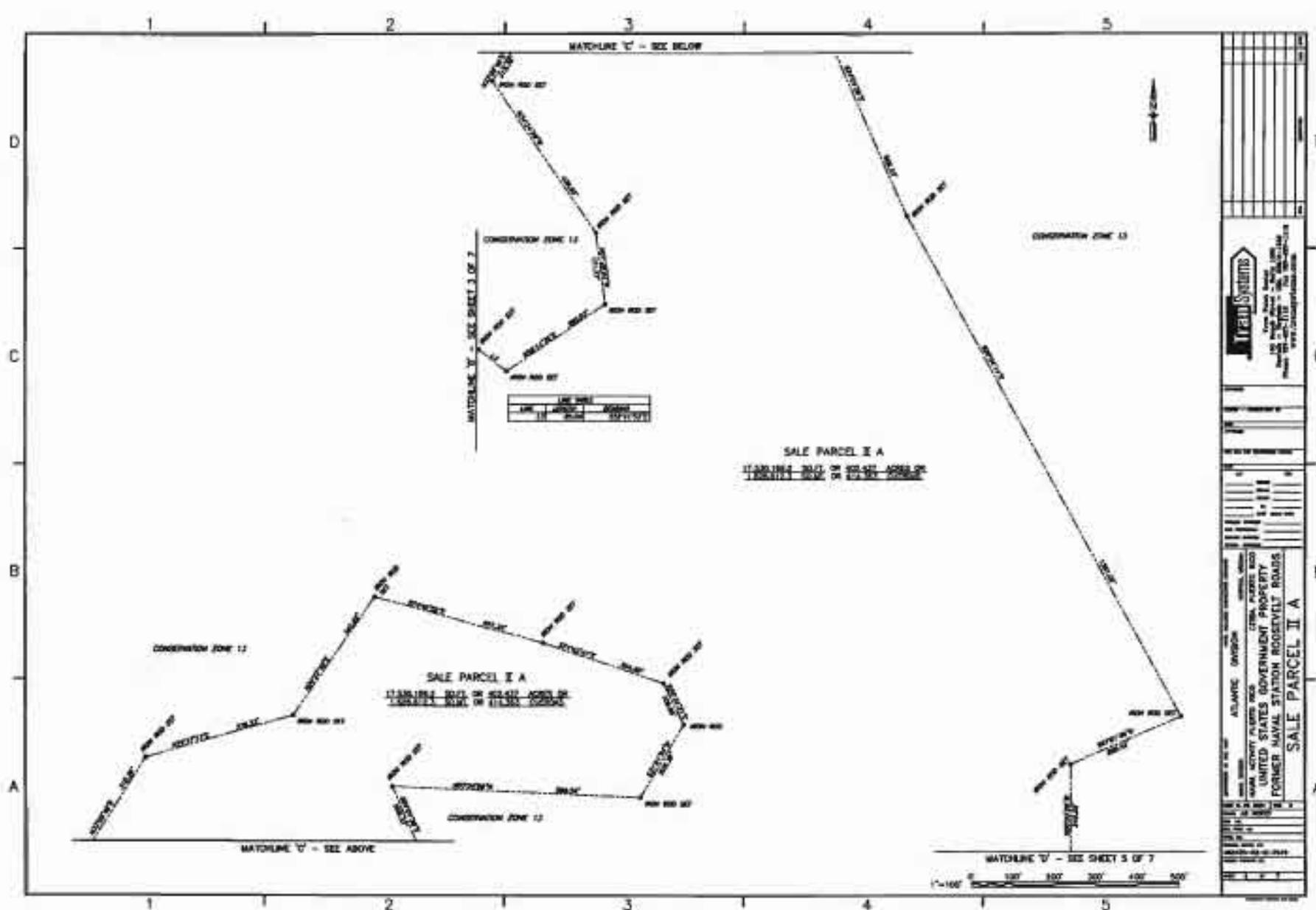
NO.	DESCRIPTION	DATE
1	PRELIMINARY	08/20/03
2	REVISED	09/15/03
3	REVISED	10/10/03
4	REVISED	11/10/03
5	REVISED	12/10/03

SALE PARCEL II A

PROJECT NO. 03-01
 SHEET NO. 1 OF 1
 DATE: 12/10/03
 SCALE: AS SHOWN
 DRAWN BY: J. J. [unreadable]
 CHECKED BY: [unreadable]
 APPROVED BY: [unreadable]

Train Systems
 10000 W. 10th Ave., Suite 100
 Denver, CO 80202
 Phone: 303.750.1000
 Fax: 303.750.1001
 www.train-systems.com

ATLANTIC DIVISION
 1000 AVENUE OF THE STARS
 WASHINGTON, DC 20310
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROADS



Traco Systems
 10000 W. 10th Ave., Suite 100
 Denver, CO 80202
 Tel: 303.751.1111
 Fax: 303.751.1112
 www.tracosystems.com

ATLANTIC DIVISION
 NAVAL ACTIVITY PLANNING DIVISION
 CENTRAL PLANNING AND DESIGN DIVISION
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROADS
SALE PARCEL I A

DATE: 11/11/11
 DRAWN BY: [Name]
 CHECKED BY: [Name]
 APPROVED BY: [Name]

LEGAL DESCRIPTION FOR SALE PARCEL II B

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'CASCAJO' and having a northing of 792718.7899 and an easting of 935655.9464 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL II B". Thence S00°09'52"E 191.46' to an iron rod set on the approximate edge of water of Ensenada Honda, the True Point of Beginning, having a northing of 792527.3349 and an easting of 935656.4956:

Thence S78°11'44"W 72.71' to an iron rod set;

Thence S39°17'10"W 197.50' to an iron rod set;

Thence S08°35'07"W 554.83' to an iron rod set;

Thence S56°28'03"E 86.69' to an iron rod set on the approximate edge of water of Ensenada Honda having a northing of 791763.1020 and an easting of 935449.7085;

Thence Southwest along the approximate edge of water of Vieques Passage;

Thence West along the approximate edge of water of Vieques Passage;

Thence North along the approximate edge of water to an iron rod set having a northing of 790646.4126 and an easting of 933016.8045

Thence S88°04'00"E 176.63' to an iron rod set

Thence N63°47'43"E 121.99' to an iron rod set;

Thence N80°58'39"E 153.66' to an iron rod set;

Thence N14°40'48"W 230.17' to an iron rod set;

Thence N87°12'00"W 269.55' to an iron rod set;

Thence N27°02'40"W 182.08' to an iron rod set;

Thence N20°29'37"W 194.61' to an iron rod set;

Thence N20°19'37"W 302.30' to an iron rod set;

Thence following a curve to an iron rod set; with a long chord of 136.56', a chord bearing of N23°36'05"W,

Radius= 1195.39'

Arc=136.64'

Thence N26°52'33"W 259.49' to an iron rod set;

Thence following a curve to an iron rod set; with a long chord of 230.12', a chord bearing of N34°09' 10"W,

Radius= 908.39'

Arc=230.74'

Thence N48°34'14"E 49.22' to an iron rod set;

Thence N48°34'14"E 55.09' to an iron rod set;

Thence N17°43'35"E 80.21' to an iron rod set;

Thence N48°47'03"E 102.45' to an iron rod set;

Thence N71°08'08"E 97.48' to an iron rod set;

Thence N71°08'08"E 33.22' to a point not set on the approximate edge of water of Ensenada Honda having a northing of 792384.4126 and an easting of 932873.2568;

Thence Southeast along the approximate edge of water of Ensenada Honda to an iron rod set having a northing of 791812.7113 and an easting of 933338.2827;

Thence S45°58'22"W 97.06' to an iron rod set;

Thence S48°49'44"W 93.85' to an iron rod set;

Thence S58°41'06"W 138.43' to an iron rod set;

Thence S18°28'24"E 268.60' to an iron rod set;

Thence S74°04'45"E 425.18' to an iron rod set;

Thence N17°26'49"E 254.40' to an iron rod set;

Thence N56°30'28"E 110.37' to an iron rod set;

Thence N07°44'44"E 276.03' to an iron rod set;

Thence N36°34'58"E 234.19' to an iron rod set;

Thence N55°30'53"E 337.29' to an iron rod set;

Thence N68°31'23"E 538.98' to an iron rod set;

Thence N03°56'03"E 232.44' to an iron rod set;

Thence N47°51'06"E 344.84' to an iron rod set;
Thence N57°17'07"E 199.60' to an iron rod set;
Thence S21°52'30"E 192.18' to an iron rod set;
Thence S79°06'21"E 190.07' to an iron rod set;
Thence N85°42'44"E 46.37' to an iron rod set;
Thence N58°08'36"E 48.91' to an iron rod set on the approximate edge of water of Ensenada Honda;
Thence East along the approximate edge of water of Ensenada Honda;
Thence South along the approximate edge of water of Ensenada Honda to the True Point of Beginning.

Said parcel containing 4,124,358.8 square feet or 94.682 acres, which equates to 383,167.0 square meters or 97.488 cuerdas.

LEGAL DESCRIPTION
PARCEL 18

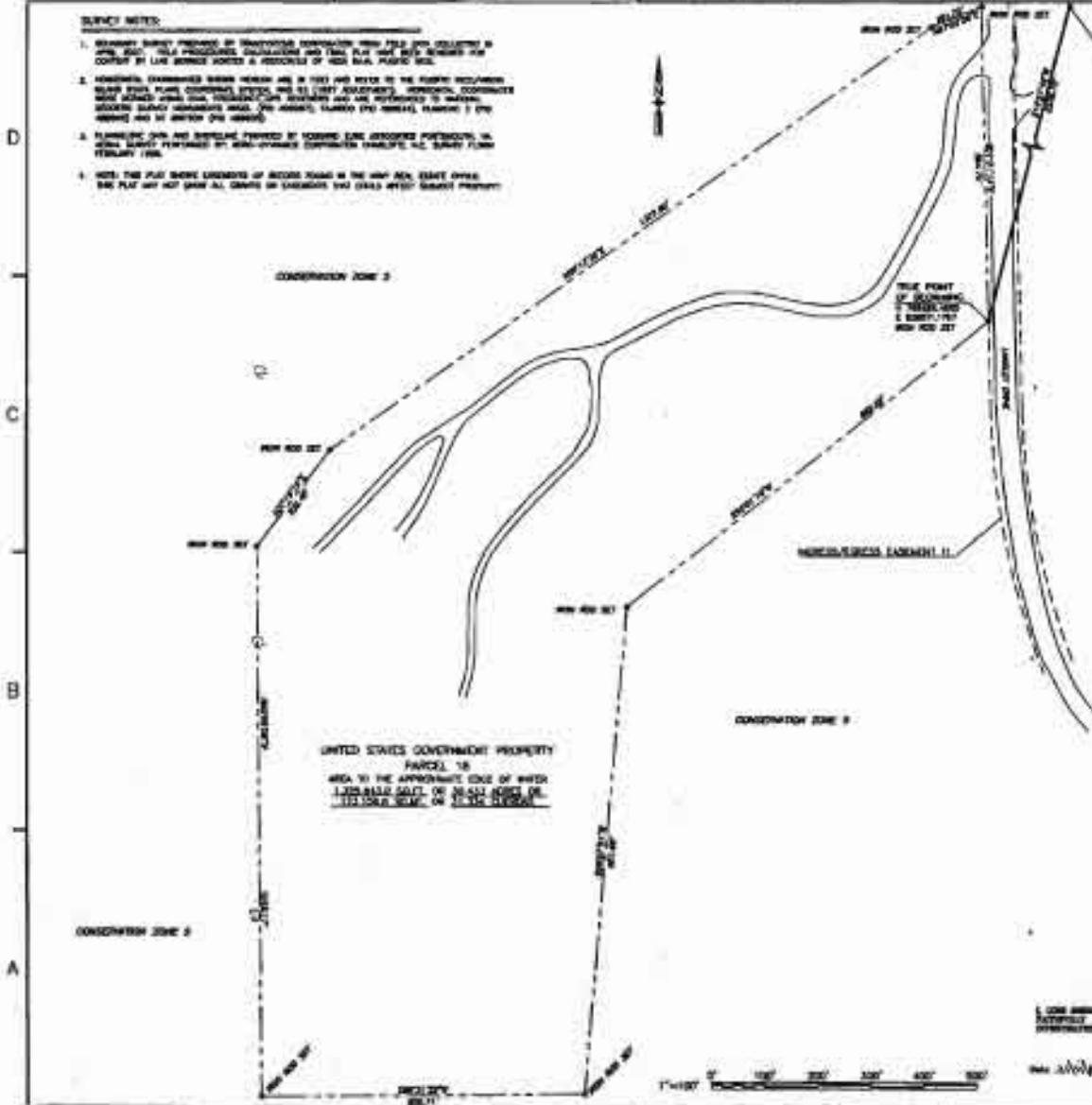
Beginning at a survey control point in the Ward of Quebrada Seca, said point being a brass disk set in concrete. Said point also known as 'DELICIAS' and having a northing of 799143.8537 and an easting of 927504.4901 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS PARCEL 18". Thence S14°27'46"W 2535.75' to an iron rod set, the True Point of Beginning, having a northing of 796688.4650 and an easting of 926871.1797:

Thence S52°01'18"W 862.52' to an iron rod set;
Thence S05°07'51"W 901.66' to an iron rod set;
Thence S89°31'32"W 609.71' to an iron rod set;
Thence N00°26'08"W 1015.17' to an iron rod set;
Thence N37°19'15"E 225.45' to an iron rod set;
Thence N55°13'32"E 1377.50' to an iron rod set;
Thence N67°52'28"E 101.72' to an iron rod set;
Thence S01°31'13"E 584.75' to an iron rod set, the True Point of Beginning.

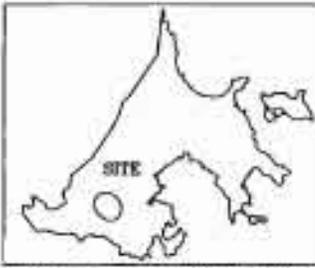
Said parcel containing 1,325,643.0 square feet or 30.433 acres, which equates to 123,156.8 square meters or 31.334 cuerdas.

SURVEY NOTES:

1. SURVEY POINTS PROVIDED BY NAVY/NAVY CONTRACTORS WERE FIELD AND COLLECTED IN 1981 AND ALL PROVISIONAL CALCULATIONS AND THIS PLAN HAVE BEEN APPROVED FOR CONTROL BY THE SURVEY SERVICE & RECORDS OF THE NAVY, PUEBLO, N.M.
2. MONUMENTS (UNMARKED) WERE RECOVERED AND IN 1981 AND SET TO THE POINTS INDICATED NEAR STATION PLANS (CONTRACTS 1981) AND (1) (2) (3) (4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18) (19) (20) (21) (22) (23) (24) (25) (26) (27) (28) (29) (30) (31) (32) (33) (34) (35) (36) (37) (38) (39) (40) (41) (42) (43) (44) (45) (46) (47) (48) (49) (50) (51) (52) (53) (54) (55) (56) (57) (58) (59) (60) (61) (62) (63) (64) (65) (66) (67) (68) (69) (70) (71) (72) (73) (74) (75) (76) (77) (78) (79) (80) (81) (82) (83) (84) (85) (86) (87) (88) (89) (90) (91) (92) (93) (94) (95) (96) (97) (98) (99) (100) (101) (102) (103) (104) (105) (106) (107) (108) (109) (110) (111) (112) (113) (114) (115) (116) (117) (118) (119) (120) (121) (122) (123) (124) (125) (126) (127) (128) (129) (130) (131) (132) (133) (134) (135) (136) (137) (138) (139) (140) (141) (142) (143) (144) (145) (146) (147) (148) (149) (150) (151) (152) (153) (154) (155) (156) (157) (158) (159) (160) (161) (162) (163) (164) 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LOCATION MAP
NOT TO SCALE



NAVAL ACTIVITY PUERTO RICO
NOT TO SCALE



CERTIFICATION

I, THE SURVEYOR, CERTIFY THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATE: 10/10/81
 SURVEYOR: LEO WOODS, SURVEYOR
 LICENSE NO. 1000
 STATE OF PUERTO RICO
 10/10/81

TITLE SYSTEMS 1000 N. W. 10th St., Suite 100 Ft. Lauderdale, FL 33309 (305) 555-1111 WWW.TITLESYSTEMS.COM	
PROJECT: NAVAL ACTIVITY PUERTO RICO PARCEL 18	
SHEET NO. 18 OF 18	
DATE: 10/10/81	
DRAWN BY: [Signature]	
CHECKED BY: [Signature]	
APPROVED BY: [Signature]	

LEGAL DESCRIPTION
VETERANS HEALTH CLINIC

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "VETERANS HEALTH CLINIC". Thence N50°37'43"E 1,415.10' to an iron rod set, the True Point of Beginning, having a northing of 797544.4322 and an easting of 928843.8368:

Thence N34°24'56"E 458.65' to an iron rod set;
Thence S54°36'53"E 222.75' to an iron rod set;
Thence S34°51'57"W 455.75' to an iron rod set;
Thence N55°21'36"W 219.14' to an iron rod set, the True Point of Beginning.

Said parcel containing 101,012.8 square feet or 2.319 acres, which equates to 9,384.4 square meters or 2.388 cuerdas.

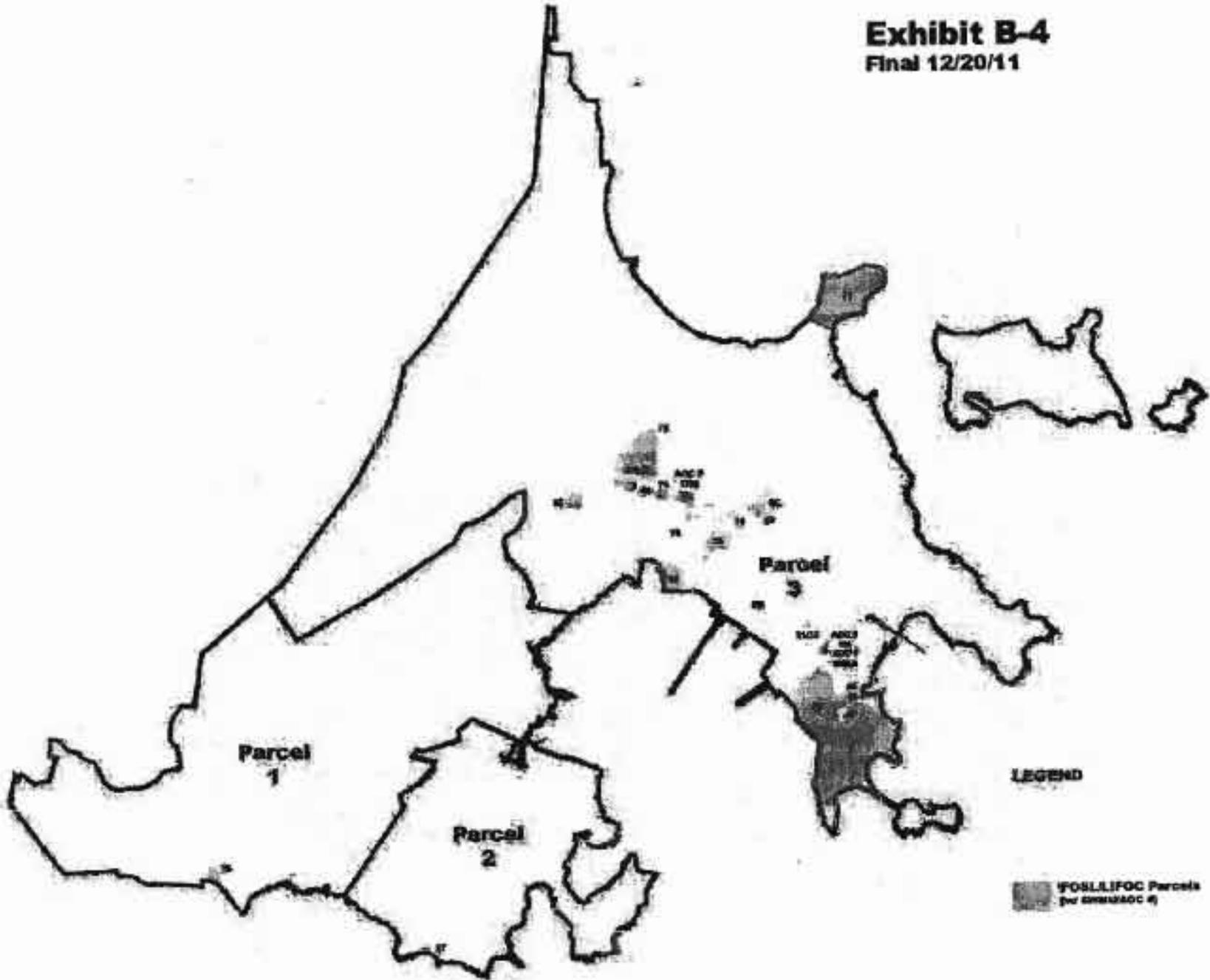
AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

ATTACHMENT 3

**Exhibit B-4 to the EDC Agreement
Lease Parcel**

Exhibit B-4

Final 12/20/11



LEGAL DESCRIPTION FOR SWMU 1

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 1". Thence N58°57'26"E 2403.14' to an iron rod set, the True Point of Beginning, having a northing of 797866.0197 and an easting of 929808.8584:

Thence N63°39'57"W 276.93' to an iron rod set;

Thence N11°12'34"E 799.10' to an iron rod set;

Thence N51°42'42"E 333.75' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 385.43', chord bearing of N37°46'56"E

Radius=6625.79'

Arc=385.49'

Thence S54°59'22"E 22.37' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 433.01', chord bearing of S79°52'10"E

Radius=514.61'

Arc=446.92'

Thence N75°15'02"E 302.30' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 366.14', chord bearing of S88°16'44"E

Radius=645.39'

Arc=371.24'

Thence S71°32'09"E 382.16' to an iron rod set;

Thence S08°06'20"W 161.28' to an iron rod set;

Thence S05°28'23"E 201.30' to an iron rod set;

Thence S44°50'20"W 157.18' to an iron rod set;

Thence S22°30'01"W 188.70' to an iron rod set;

Thence S49°18'21"E 304.47' to an iron rod set;

Thence S40°43'54"W 234.32' to an iron rod set;

Thence N48°53'06"W 341.06' to an iron rod set;

Thence S57°22'07"W 200.84' to an iron rod set;

Thence S77°26'54"W 203.26' to an iron rod set;

Thence S48°15'05"W 319.44' to an iron rod set;

Thence S76°26'56"W 222.61' to an iron rod set;

Thence S32°56'31"W 107.06' to an iron rod set;

Thence N63°38'46"W 69.45' to an iron rod set, the True Point of Beginning.

Said parcel containing 1,669,918.0 square feet or 38.336 acres, which equates to 155,141.1 square meters or 39.472 cuerdas.

LEGAL DESCRIPTION FOR SWMU 2

Beginning at a survey control point in the Ward of Quebrada Seca, said point being a brass disk set in concrete. Said point also known as 'DELICIAS' and having a northing of 799143.8537 and an easting of 927504.4901 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 2". Thence N70°46'10"E 4387.62' to an iron rod set, the True Point of Beginning, having a northing of 800588.9980 and an easting of 931647.2922:

Thence N32°10'38"W 212.43' to an iron rod set;

Thence N59°52'22"W 269.49' to an iron rod set;

Thence N19°59'21"E 388.45' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 220.15', chord bearing of N24°35'36"E

Radius=1371.21'

Arc=220.39'

Thence S61°12'38"E 606.80' to an iron rod set;

Thence S51°34'23"E 917.04' to a 2" pipe with a northing of 800607.1020 and an easting of 932775.6912 set on line at the edge of the mangroves;

Thence S51°34'23"E 277.70' to a point not set;

Thence S47°51'23"W 860.18' to a point not set;

Thence N44°03'52"W 273.78' to a 2" pipe with a northing of 800054.0594 and an easting of 932165.0410 set at the edge of mangroves;

Thence N44°03'52"W 744.46' to an iron rod set the True Point of Beginning.

Said parcel containing 1,205,356.6 square feet or 27.671 acres, which equates to 111,981.7 square meters or 28.491 cuerdas.

LEGAL DESCRIPTION FOR SWMU 71

Beginning at a survey control point in the Ward of Quebrada Seca, said point being a brass disk set in concrete. Said point also known as 'DELICIAS' and having a northing of 799143.8537 and an easting of 927504.4901 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 71". Thence N56°45'58"E 2729.83' to an iron rod set, the True Point of Beginning, having a northing of 800639.9561 and an easting of 929787.8361:

Thence N57°34'40"E 783.74' to an iron rod set;
Thence S39°04'27"E 1114.20' to an iron rod set;
Thence S47°10'22"W 239.01' to an iron rod set;
Thence S63°53'18"W 442.91' to an iron rod set;
Thence S43°59'47"W 245.79' to an iron rod set;
Thence N37°34'41"W 718.38' to an iron rod set;
Thence N23°57'39"W 448.30' to an iron rod set the True Point of Beginning.

Said parcel containing 996,374.7 square feet or 22.874 acres, which equates to 92,566.6 square meters or 23.551 cuerdas.

LEGAL DESCRIPTION FOR SWMU 54

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 26,54,61 & AOC 520". Thence S53°11'43"W 2821.83' to an iron rod set, the True Point of Beginning, having a northing of 794599.7876 and an easting of 918178.4348:

Thence S67°25'56"W 114.56' to an iron rod set;
Thence N75°03'20"W 108.88' to an iron rod set;
Thence S73°33'50"W 60.33' to an iron rod set;
Thence N19°22'09"W 149.89' to an iron rod set;
Thence N23°47'15"W 134.87' to an iron rod set;
Thence N68°31'38"E 195.13' to an iron rod set;
Thence S24°42'06"E 131.90' to an iron rod set;
Thence N65°24'33"E 50.59' to an iron rod set
Thence S23°48'51"E 223.54' to an iron rod set, the True Point of Beginning.

Said parcel containing 75,907.8 square feet or 1.743 acres, which equates to 7,052.1 square meters or 1.794 cuerdas.

LEGAL DESCRIPTION FOR SWMU 61

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 26,54,61 & AOC 520". Thence S51°13'15"W 3348.67' to an iron rod set. Thence S89°48'48"W 196.76' to an iron rod set. Thence S03°57'44"E 46.30' to an iron rod set, the True Point of Beginning, having a northing of 794146.1427 and an easting of 917633.7544:

Thence S89°15'46"W 334.65' to an iron rod set;
Thence N18°01'11"W 368.92' to an iron rod set;
Thence N04°18'45"E 132.39' to an iron rod set;
Thence N19°37'50"E 89.58' to an iron rod set;
Thence S86°37'21"E 454.62' to an iron rod set;
Thence S10°16'12"W 264.87' to an iron rod set;
Thence S00°16'40"W 229.31' to an iron rod set;
Thence S03°57'44"E 46.30' to an iron rod set, the True Point of Beginning.

Said parcel containing 231,084.6 square feet or 5.305 acres, which equates to 21,468.5 square meters or 5.462 cuerdas.

LEGAL DESCRIPTION FOR SWMU 62

Beginning at a survey control point in the Ward of Daguao, said point being a brass disk set in concrete. Said point also known as 'MANATI' and having a northing of 791059.1339 and an easting of 921490.5759 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 28 & 62". Thence N53°07'00"W 3535.65' to an iron rod set, the True Point of Beginning, having a northing of 793181.1860 and an easting of 918662.5529:

Thence S18°11'55"W 226.45' to an iron rod set;
Thence S87°15'57"W 201.84' to an iron rod set;
Thence N40°41'45"W 104.29' to an iron rod set;
Thence N58°24'48"W 176.03' to an iron rod set;
Thence S88°21'13"W 325.67' to an iron rod set;
Thence N10°34'42"W 91.78' to an iron rod set;
Thence S83°43'09"W 222.44' to an iron rod set;
Thence N11°22'22"W 548.80' to an iron rod set;
Thence N81°20'53"E 391.79' to an iron rod set;
Thence S83°26'35"E 347.16' to an iron rod set;
Thence S50°33'14"E 315.51' to an iron rod set;
Thence S31°52'44"E 185.55' to an iron rod set;
Thence S23°32'05"E 220.70' to an iron rod set, the True Point of Beginning.

Said parcel containing 635,559.9 square feet or 14.590 acres, which equates to 59,045.7 square meters or 15.023 cuerdas.

LEGAL DESCRIPTION FOR AOC 520

Beginning at a survey control point in the Ward of Daguao, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 26,54,61 & AOC 520". Thence S72°16'13"W 2867.06' to an iron rod set, the True Point of Beginning, having a northing of 795417.2143 and an easting of 917706.9476:

Thence S00°45'29"W 502.34' to an iron rod set;

Thence N72°06'29"W 414.51' to an iron rod set;

Thence N00°15'00"W 247.00' to an iron rod set;

Thence N72°21'06"E 422.05' to an iron rod set, the True Point of Beginning.

Said parcel containing 149,230.4 square feet or 3.426 acres, which equates to 13,864.0 square meters or 3.527 cuerdas.

LEGAL DESCRIPTION FOR AOC 731

Beginning at a survey control point in the Ward of Daguan, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS AOC 731, 734 & 735". Thence S30°38'59"W 1551.69' to an iron rod set, the True Point of Beginning, having a northing of 794955.3952 and an easting of 919646.8003:

Thence S34°41'11"E 105.26' to an iron rod set;

Thence S56°28'40"W 125.28' to an iron rod set;

Thence N33°27'35"W 104.79' to an iron rod set;

Thence N56°16'07"E 123.02' to an iron rod set, the True Point of Beginning.

Said parcel containing 13,038.3 square feet or 0.299 of an acre, which equates to 1,211.3 square meters or 0.308 of a cuerda.

LEGAL DESCRIPTION FOR AOC 734

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS AOC 731,734 & 735". Thence S18°34'15"W 835.55' to an iron rod set. Thence S34°49'28"E 271.43' to an iron rod set. Thence S57°01'29"W 172.98' to an iron rod set, the True Point of Beginning, having a northing of 795181.3064 and an easting of 920181.6148:

Thence S56°40'31"W 106.03' to an iron rod set;

Thence N33°26'48"W 108.88' to an iron rod set;

Thence N56°27'13"E 104.85' to an iron rod set;

Thence S34°03'49"E 109.29' to an iron rod set, the True Point of Beginning.

Said parcel containing 11,501.8 square feet or 0.264 of an acre, which equates to 1,068.6 square meters or 0.272 of a cuerda.

LEGAL DESCRIPTION FOR AOC 735

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS AOC 731,734 & 735". Thence S18°34'15"W 835.55' to an iron rod set, the True Point of Beginning, having a northing of 795498.2702 and an easting of 920171.7267:

Thence S34°49'28"E 271.43' to an iron rod set;

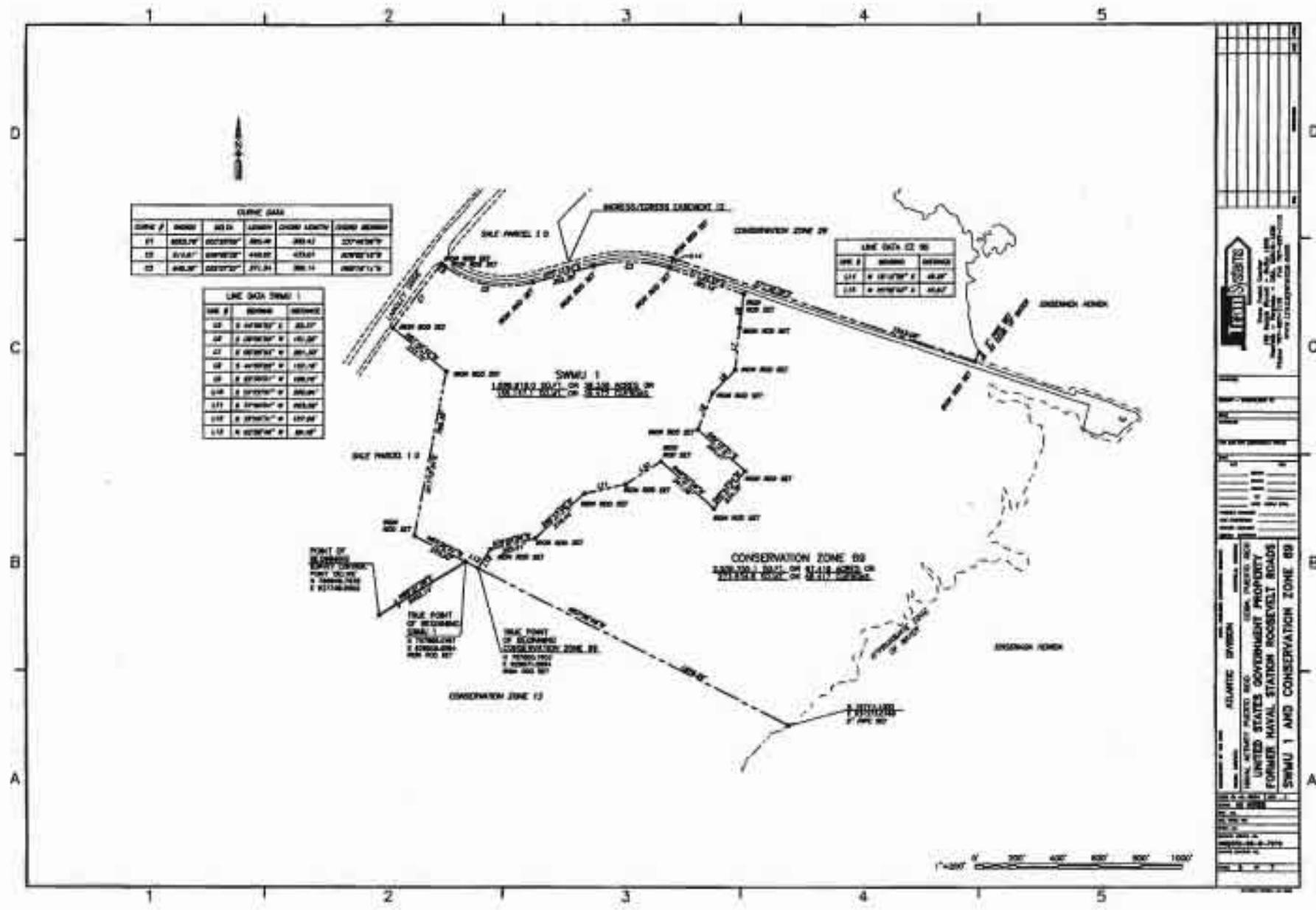
Thence S57°01'29"W 172.98' to an iron rod set;

Thence N34°03'49"W 109.29' to an iron rod set;

Thence N31°13'17"W 190.41' to an iron rod set;

Thence N67°01'51"E 162.95' to an iron rod set, the True Point of Beginning.

Said parcel containing 48,070.6 square feet or 1.104 acres, which equates to 4,465.9 square meters or 1.136 cuerdas.



CURVE DATA

CURVE #	INSIDE	BEYOND	LENGTH	CHORD LENGTH	CHORD BEARING
01	882.17'	822.07'	486.44'	383.41'	229°42'17"
02	614.17'	629.02'	448.00'	423.61'	209°02'17"
03	488.37'	622.02'	271.24'	386.14'	280°01'17"

LINE DATA SHEET 1

LINE #	BEARING	DISTANCE
01	S 87°00'00" W	25.00'
02	S 87°00'00" W	25.00'
03	S 87°00'00" W	25.00'
04	S 87°00'00" W	25.00'
05	S 87°00'00" W	25.00'
06	S 87°00'00" W	25.00'
07	S 87°00'00" W	25.00'
08	S 87°00'00" W	25.00'
09	S 87°00'00" W	25.00'
10	S 87°00'00" W	25.00'
11	S 87°00'00" W	25.00'
12	S 87°00'00" W	25.00'
13	S 87°00'00" W	25.00'
14	S 87°00'00" W	25.00'

LINE DATA SHEET 2

LINE #	BEARING	DISTANCE
01	N 87°00'00" E	25.00'
02	N 87°00'00" E	25.00'

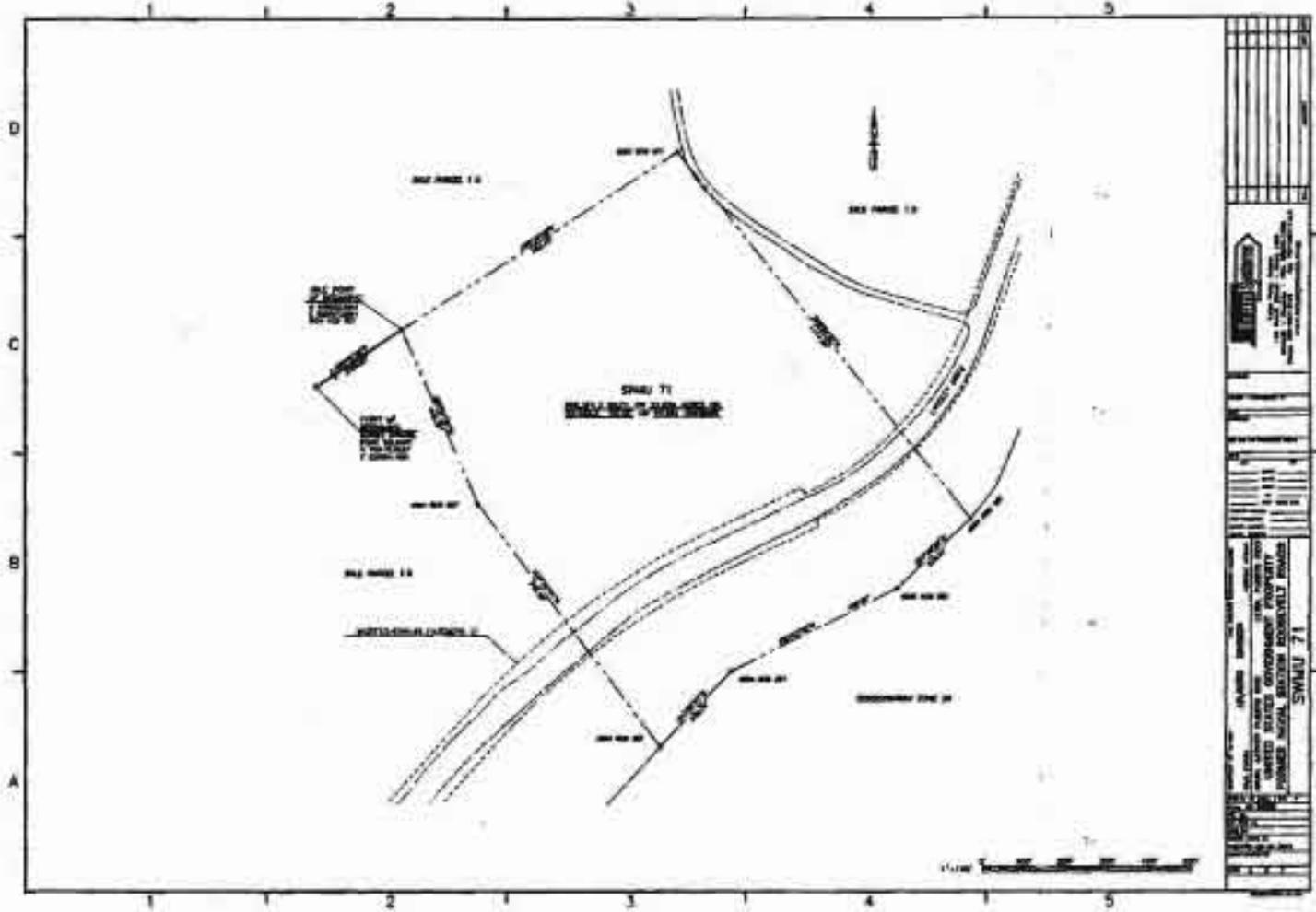
Iron Systems
 10000 W. 10th Ave., Suite 100, Denver, CO 80202
 Phone: 303.751.1000
 Fax: 303.751.1001
 Email: sales@ironsystems.com
 Website: www.ironsystems.com

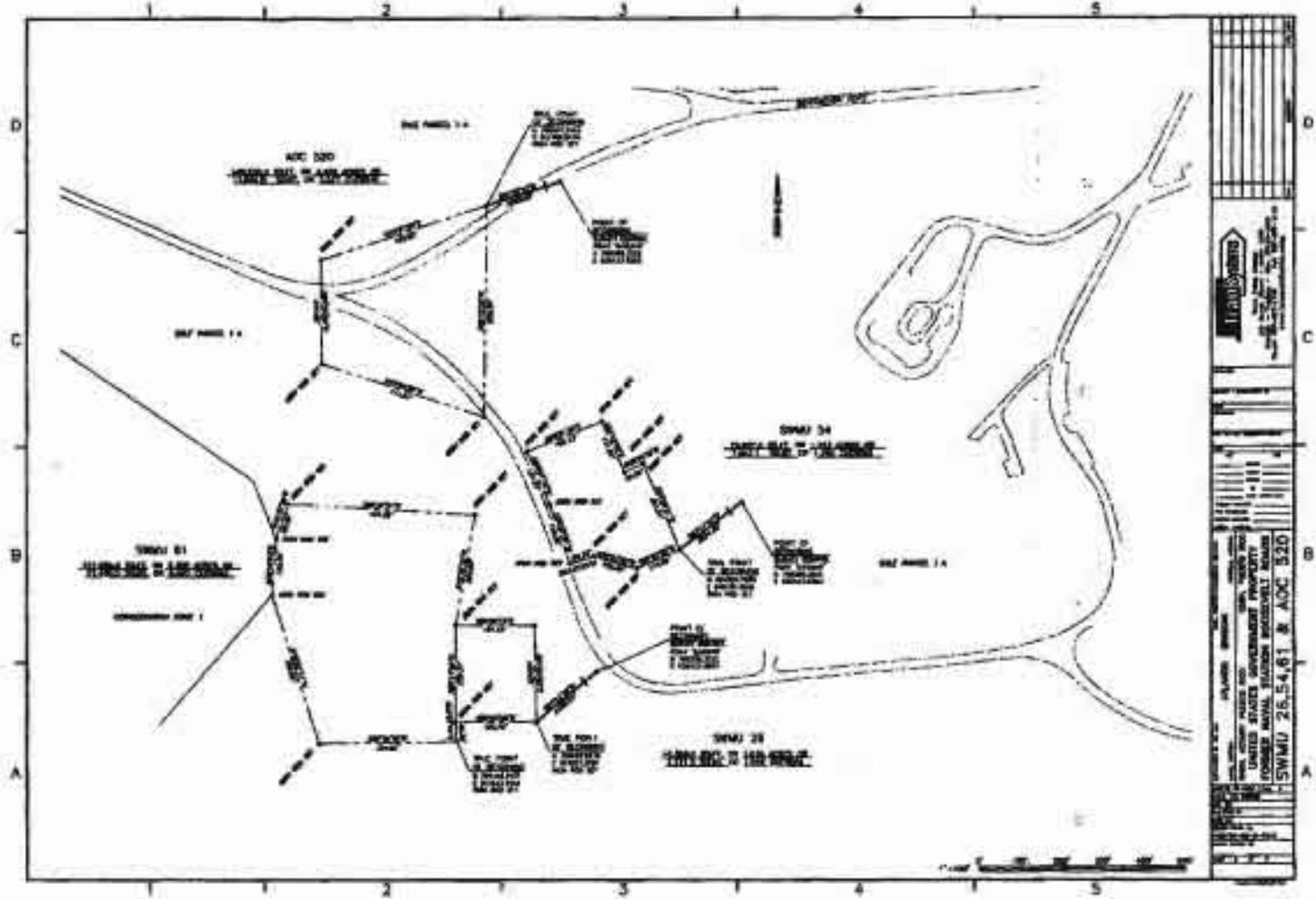
ATLANTIC DIVISION
 10000 W. 10th Ave., Suite 100, Denver, CO 80202
 Phone: 303.751.1000
 Fax: 303.751.1001
 Email: sales@ironsystems.com
 Website: www.ironsystems.com

DRAWN BY: [Name]
 CHECKED BY: [Name]
 DATE: [Date]

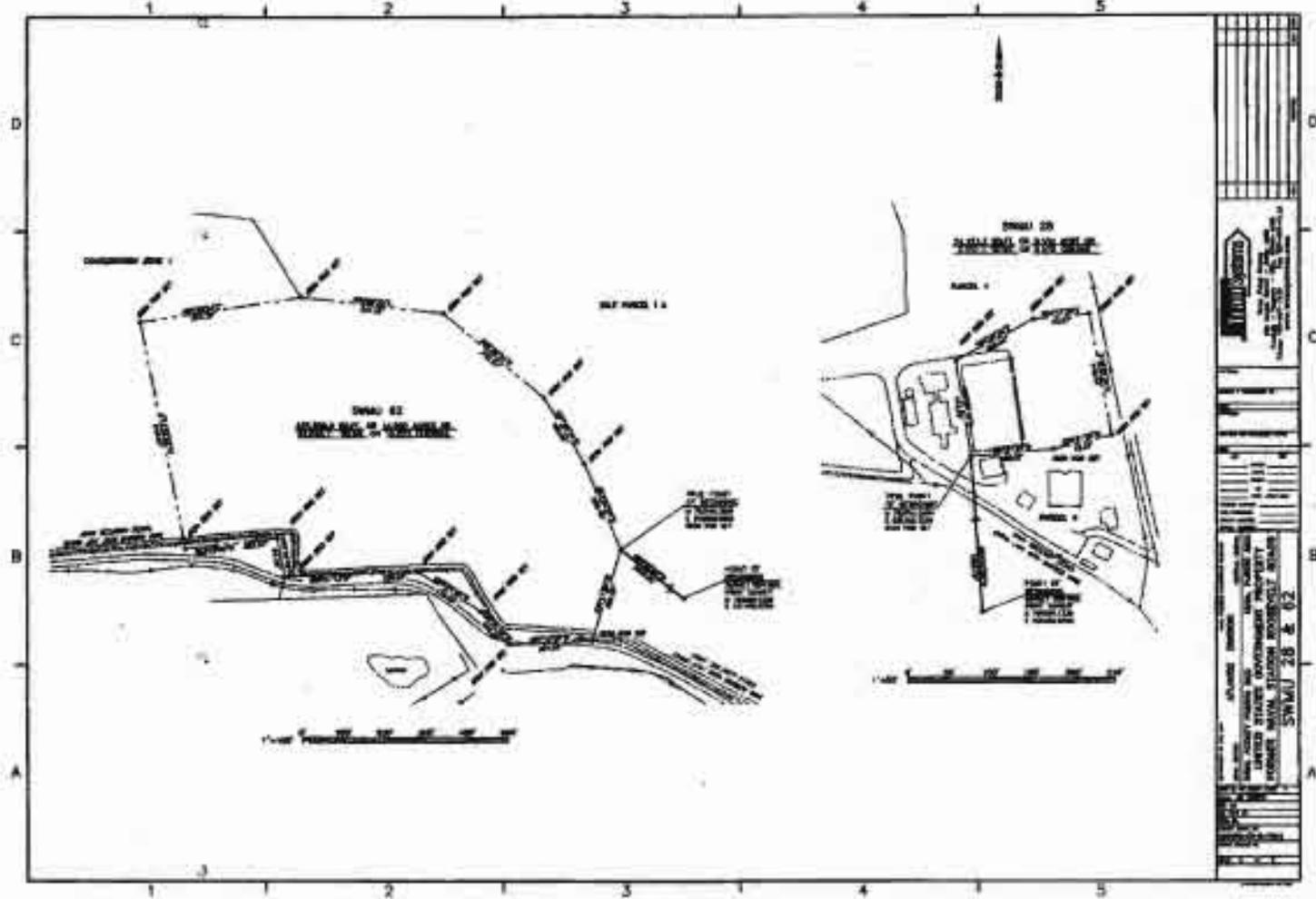
UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROADS
 SWMU 1 AND CONSERVATION ZONE 09

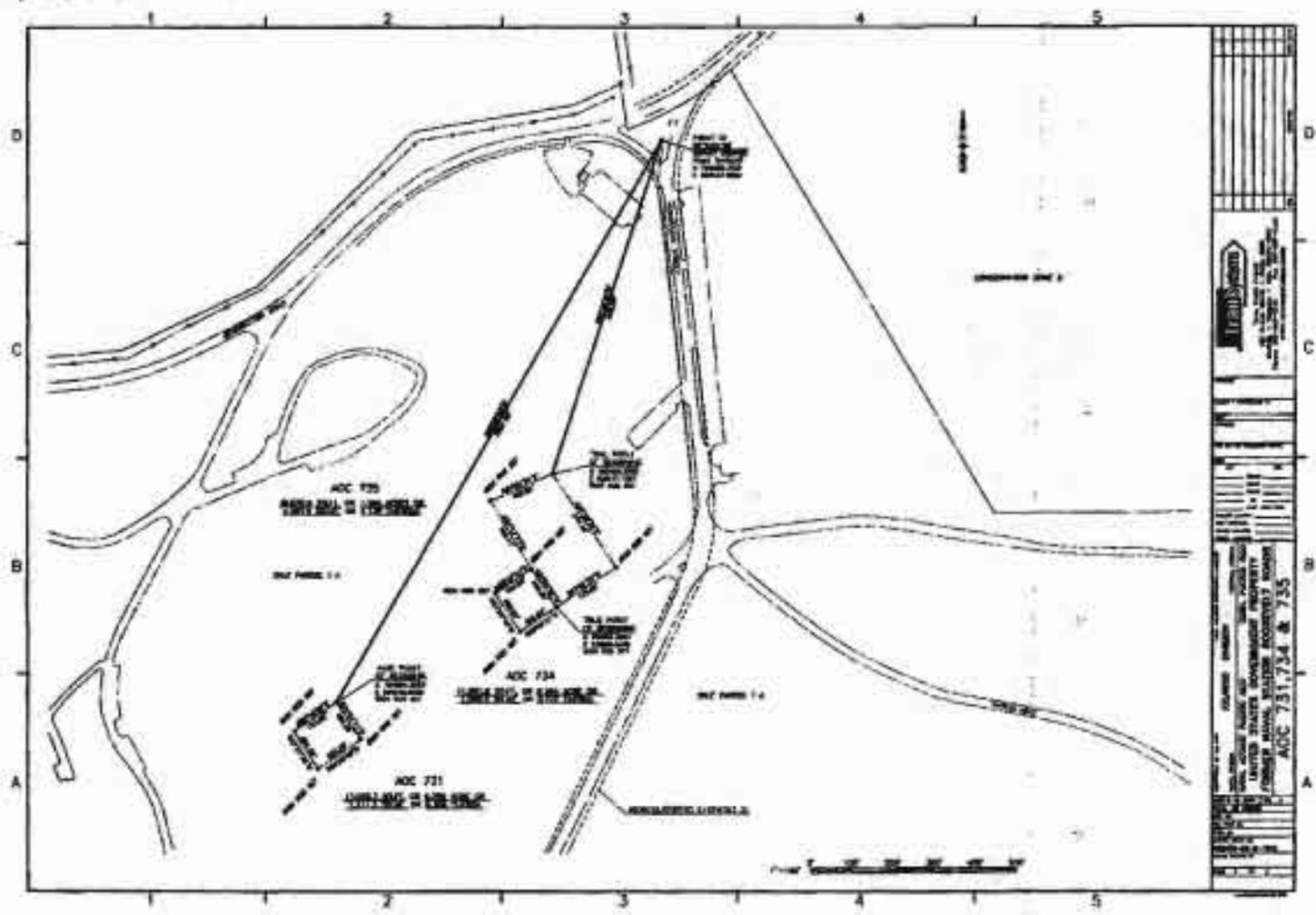






UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION PROPOSED BARRACKS SWMU 26, 54, 61 & AOC 520	
DRAWN BY: [Name] CHECKED BY: [Name] DATE: [Date]	
SCALE: [Scale]	
SHEET NO. [Number] OF [Total]	





UNITED STATES GOVERNMENT PROPERTY
 FORMER MAINE BARRIER ACCESSORY ROADS
 AOC 731, 734 & 735
 AUGUST 1988

AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

ATTACHMENT 4

**Additions to Exhibit C to EDC Agreement
FOSTs and FOSL**

FINDING OF SUITABILITY TO TRANSFER

SALE PARCEL I - BUNDY

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



Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, South Carolina 29405**

January 2008

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

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EXHIBITS

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- C Parcel Maps
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**FINDING OF SUITABILITY TO TRANSFER
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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 Sale Parcel I - Bundy (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, 2006b) 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 approximately 1,351 acres located in the southwest section of the installation, and includes the "downtown" commercial/institutional area, elementary school, 9-hole golf course, office and administrative buildings, theatre, fitness center, a portion of the ammunition storage area south of the airfield, the Rainbow Hill family housing area (duplex and apartment-type units), Bachelor Officer Quarters (BOQ) and Bachelor Enlisted Quarters (BEQ), Navy Lodge, and the Coast Guard pier. As shown on the vicinity map in Exhibit B, the Subject Property does not include ten non-contiguous areas wholly or partially surrounded by Sale Parcel I. These areas total approximately 170 acres and are comprised of Area of Concern (AOC) F (four locations) and Solid Waste Management Units (SWMUs) 1, 2, 54, 61, 62 and 71. These areas were carved out of Sale Parcel I because they are Resource Conservation and Recovery Act (RCRA) SWMUs and AOCs with work remaining to be completed under the Administrative Order on Consent (Consent Order) that sets out the Navy's corrective action obligations under RCRA. Furthermore, the SWMUs cannot be included in the transfer of Sale Parcel I because all necessary remedial actions have not been taken prior to transfer as required by

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Section 120(h)(3)(A)(ii)(I) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Navy and the winning bidder in the public auction of Sale Parcel I will execute a lease in furtherance of conveyance for the carve-out areas. Upon successful completion of all necessary remedial actions by the Navy, the leased property will be transferred to the new owner of Sale Parcel I.

The Subject Property is comprised of Sub-Parcels 2, 3, 17, 19, 21, 22, 25 and 27, as shown on parcel maps (Exhibit C) 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 AOC F and SWMUs 1, 2, 54, 61 (shown as ECP 7), 62 (shown as ECP 8) and 71 (shown as ECP 17), and are not included in the Subject Property. The boundaries of the SWMUs and AOCs shown on these maps are approximate and have changed since the draft parcel map report was produced, thus they do not match the current boundaries shown on the vicinity map (Exhibit B). Furthermore, since the draft parcel map report was published, the northern boundary of Sub-Parcel 27 has been shifted approximately 700 feet to the south. The survey maps in Exhibit D provide the final boundaries for the Subject Property.

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.

3.0 PAST USE AND PROPOSED REUSE

The Subject Property 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 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.

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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 the Subject Property: Moderate Lodging, Residential, Learning and Training Center, Public Golf Course, Mixed Use (commercial), University Campus and Public School. The Subject Property will be sold via public auction to the highest qualified bidder.

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 four Resource Conservation and Recovery Act (RCRA) Solid Waste Management Units (SWMUs) on the Subject Property that have been designated Corrective Action Complete Without Controls and require no further action.

In December 2007, EPA approved the Corrective Action Complete Without Controls recommendation for SWMU 16, Waste Explosives Storage, Building 1666 (Baker, 2007). RCRA Facility Investigation (RFI) sampling indicated no surface or subsurface soil contamination has resulted from waste explosives storage. Two explosives compounds were detected in groundwater at concentrations below their reporting limits. Furthermore, groundwater is not present to a significant extent beneath the site.

An RFI was not required at SWMU 38 (Sanitary and Storm Sewer Systems) based on research, interviews and visual inspections. Under the Consent Order, this determination is contingent 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, which are not in the vicinity of the Subject Property, 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 B.

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Sampling at SWMU 26 (Abandoned Engine Oil Drums, Building 544 Area) and SWMU 63 (Former Pistol Range at BEQ) did not identify chemicals of potential concern. Thus, no additional investigation or remediation was required at these SWMUs.

Detailed descriptions of SWMUs 16, 26, 38 and 63 are provided in the ECP Report, while summary descriptions and their current status are provided in Table 2 (Exhibit E). SWMU locations are shown on the maps in Exhibits B and C. The Subject Property does not include the areas shown on the parcel maps in Exhibit C as having "Cleanup Remaining" (i.e., SWMUs 1, 2, 54, 61/ECP 7, 62/ECP 8 and 71/ECP 17).

B. Petroleum Contamination

According to the ECP Report, there were five underground storage tanks (USTs) on the Subject Property at the time of the ECP inspection in March 2005. As shown on Table 3 in Exhibit E, all five were empty. The ECP Report listed 10 known former USTs on the Subject Property that were removed between 1993 and 1999. Table 3 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 22 operational aboveground storage tanks (ASTs) and five oil/water separators (OWSs) on the Subject Property. These ASTs and OWSs are also listed in Table 3. 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, ASTs and OWSs 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

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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 Navy classified the Subject Property, with the exception of SWMU 16 (Category 3), SWMU 26 (Category 2) and SWMU 38 (Category 3), as Category 1 uncontaminated property (including SWMU 63). Following its review of the CERFA Report, the Puerto Rico Environmental Quality Board (EQB) concurred with this classification and provided a concurrence statement (Exhibit D) in the Final CERFA Report on 11 August 2006.

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. SWMU 16, designated Category 3 at the time of the CERFA Report, has since been determined to be suitable for transfer based on the findings of a Phase I RFI. The portion of SWMU 38 (Sanitary and Storm Sewer System) on the Subject Property is transferable because it was designated Corrective Action Complete Without Controls by EPA in the Consent Order signed on 29 January 2007. This determination is contingent 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, which are not in the vicinity of the Subject Property, and/or any other SWMU at the NAPR facility where releases may have impacted the sewer systems.

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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.

In December 2007, EPA approved the Corrective Action Complete Without Controls recommendation for SWMU 16, Waste Explosives Storage, Building 1666 (Baker, 2007). RFI sampling indicates no surface or subsurface soil contamination has resulted from waste explosives storage. Two explosives compounds were detected in groundwater at concentrations below their reporting limits. Furthermore, groundwater is not present to a significant extent beneath the site.

A former pistol range (SWMU 63) was located at the site of the new BEQ. Two of eight surface soil samples collected at SWMU 63 had lead concentrations greater than base background, but the lead concentration of all eight samples was less than the soil screening criterion. SWMU 63 has been designated as Corrective Action Complete Without Controls in the EPA Consent Order.

Since establishment of the former NSRR, munitions storage magazines have been used for the storage of various types of munitions, including bombs, missiles, explosive projectiles, pyrotechnics (e.g., flares), small arms ammunition, and any other ordnance-related items. The majority of these munitions storage magazines are located in a secure area at the southwest end of the main runway. Twenty-one of the magazines in this area are located on the Subject Property (see Exhibit E, Table 1). There are also four other magazines southwest of this area at the end of Guadalcanal Road. A magazine close-out inspection was conducted at the former NSRR by the Naval Ordnance Safety and Security Activity (NOSSA) in February 2004. This inspection confirmed that all magazines were completely cleared of all ordnance-related items, and no explosive residuals or contaminants were present in the magazines.

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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 17 of 51 non-family housing facilities inspected on the Subject Property, as summarized in Table 4 of Exhibit E. Friable, accessible and damaged (FAD) ACM was identified in three of the facilities – Building 296 (20 linear feet of pipe insulation), Building 598 (6 linear feet of pipe insulation) and Building 1686 (1 linear foot of pipe and fitting insulation). This FAD ACM will be removed prior to transfer. 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.

An ACM inspection of military family housing in the eight NAPR residential communities was performed in January and February 2005 in anticipation of property transfer. The 88-unit Rainbow Hill residential community, the only one of these communities on the Subject Property, is comprised of two, three and four bedroom duplex and apartment style units constructed in 1975 and renovated between 1998 and 2001. According to the June 2005 *Final Asbestos Inspection Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico* (Baker, 2005a), no ACM was identified in the 24 Rainbow Hill units that were inspected. These units were considered representative of the Rainbow Hill community. Detailed information about the units inspected and the materials identified and sampled during the asbestos inspection, including summary tables, location drawings, photographs and laboratory reports is included in the report.

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.

3. Lead-Based Paint

A lead-based paint (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, other

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than the Rainbow Hill housing units, were included in the survey. According to the June 2005 *Final Lead-Based Paint Inspection/Risk Assessment Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico* (Baker, 2005c), no LBP hazard of any type was identified in the Rainbow Hill housing community.

Table 1 (Exhibit E) indicates approximately 98 other buildings, structures and facilities on the Subject Property were constructed prior to 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 Hazards Advisory Statement, Exhibit G 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) 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 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.

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6. Threatened and Endangered Species

As shown on the individual parcel maps in Exhibit C, breeding habitat and nesting/foraging palms for the endangered yellow-shouldered blackbird have 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 maps.

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, 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 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.

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C. CERCLA Covenant

The deed that conveys the Subject Property will contain the covenants provided for under CERCLA Sections 120(h)(3)(A)(ii)(I) and (II) that all necessary remedial actions have been taken prior to transfer, and 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 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 Navy and EPA voluntarily entered into a Consent Order. The Consent Order set out the Navy's corrective action obligations under RCRA and replaced the 1994 RCRA permit as the document memorializing these obligations concerning NAPR. The four RCRA SWMUs on the Subject Property were either designated Corrective Action Complete Without Controls in the Consent Order or subsequent to the signing of the Consent Order based on investigations that found no further action would be necessary. Detailed descriptions of the SWMUs on the Subject Property are provided in the ECP Report, while summary descriptions and their current status are provided in Table 2 (Exhibit E).

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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 has not been issued by EQB. NSRR had a wide variety of small emission sources, which operated intermittently, with no set operation schedule. Most volatile organic compound and hazardous air pollutant emissions were generated by combustion sources, which are powered by diesel, JP-5, gasoline or propane gas. Significant emission units on the Subject Property included boilers at Buildings 729 and 731 and an 8,000-gallon gasoline AST at the Golf Course. Because of station closure, air emission sources associated with the Subject Property have been discontinued. 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.

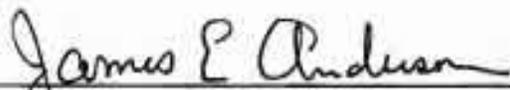
G. Notification to Regulatory Agencies / Public

In accordance with DoD guidance, U.S. 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 H. 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.

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.

1/24/08
Date



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

Exhibit A
References

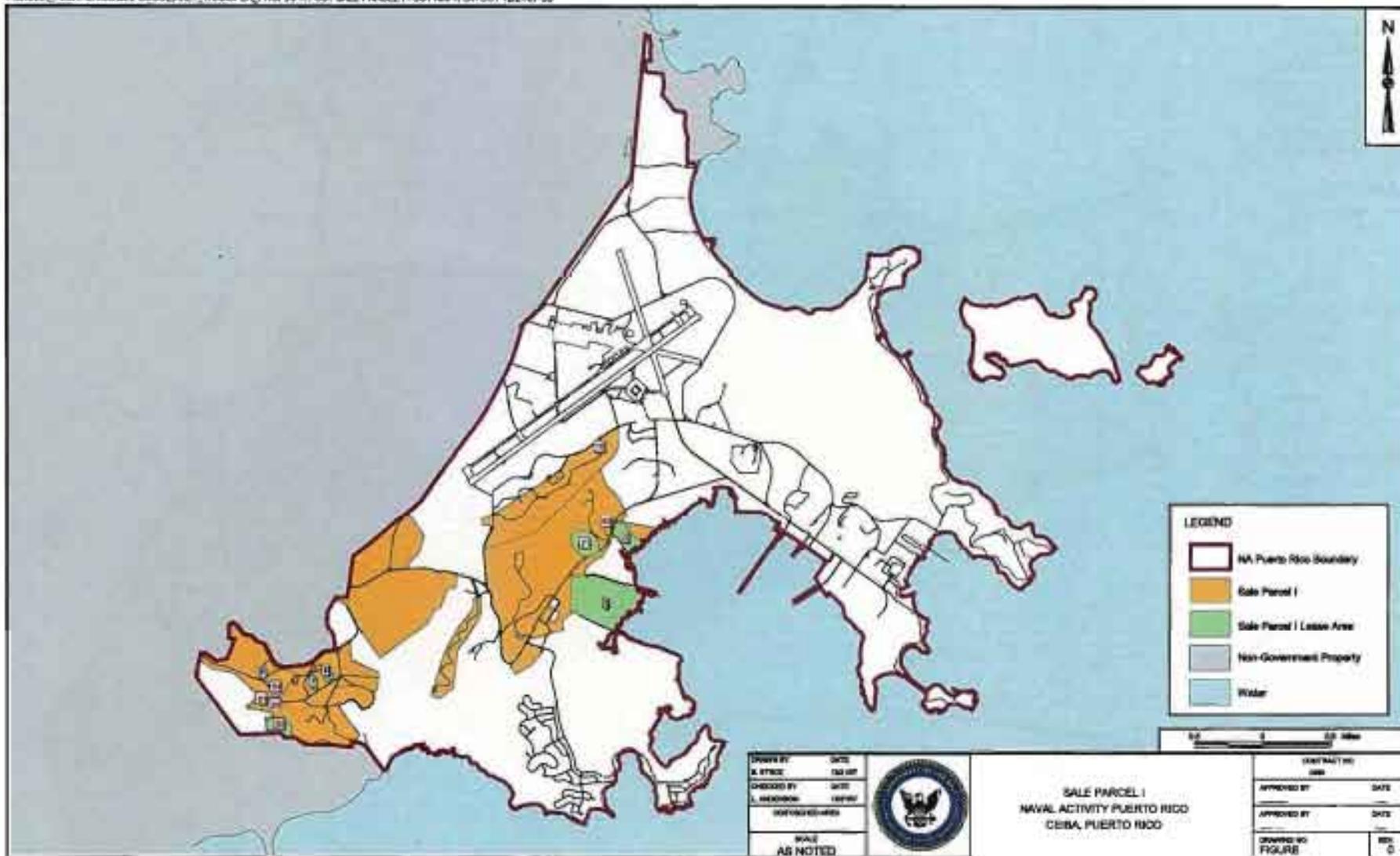
**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

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- Baker, 2005a. (Michael Baker Jr., Inc.) *Final Asbestos Inspection Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.
- Baker, 2005b. *Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.
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- EPA, 2007. (U.S. Environmental Protection Agency) *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*. January 2007.
- GMI, 2005. (Geo-Marine, Inc.) *Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico*. Hampton, Virginia. September 2005.
- Navy, 2005. (Naval Facilities Engineering Command Atlantic) *Phase I/II Environmental Condition of Property Report, Former U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico*. Norfolk, Virginia. July 15, 2005.
- Navy, 2006a. (Naval Facilities Engineering Command Atlantic). *Biological Assessment for the Disposal of Naval Station Roosevelt Roads/Naval Activity Puerto Rico Final Report*. Norfolk, Virginia. January 2006.
- 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.
- 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 and Sewer System Map



LEGEND

- NA Puerto Rico Boundary
- Sale Parcel I
- Side Parcel / Lease Area
- Non-Government Property
- Water

DESIGNED BY	DATE
DRAWN BY	DATE
CHECKED BY	DATE
DATE	DATE
SCALE AS NOTED	



SALE PARCEL I
NAVAL ACTIVITY PUERTO RICO
CEIBA, PUERTO RICO

APPROVED BY	DATE
APPROVED BY	DATE
DRAWING NO.	REV.
FIGURE	0

Exhibit C

Parcel 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) 1, 2, 54, 61 (shown as ECP 7), 62 (shown as ECP 8) and 71 (shown as ECP 17), and are not included in the Subject Property.

ECP 9 in Parcel 25 is now known as SWMU 63. The boundaries of the ECP, SWMU and AOC areas shown on these maps are approximate and have changed since the draft parcel map report was produced, thus they do not match the boundaries shown on the vicinity map (Exhibit B), which are also approximate. Furthermore, since the draft parcel map report was published, the northern boundary of Sub-Parcel 27 has been shifted approximately 700 feet to the south.

The survey maps in Exhibit D provide the final boundaries for the Subject Property.

THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 2

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—1, 3, 4, 5

Yellow-shouldered Blackbird

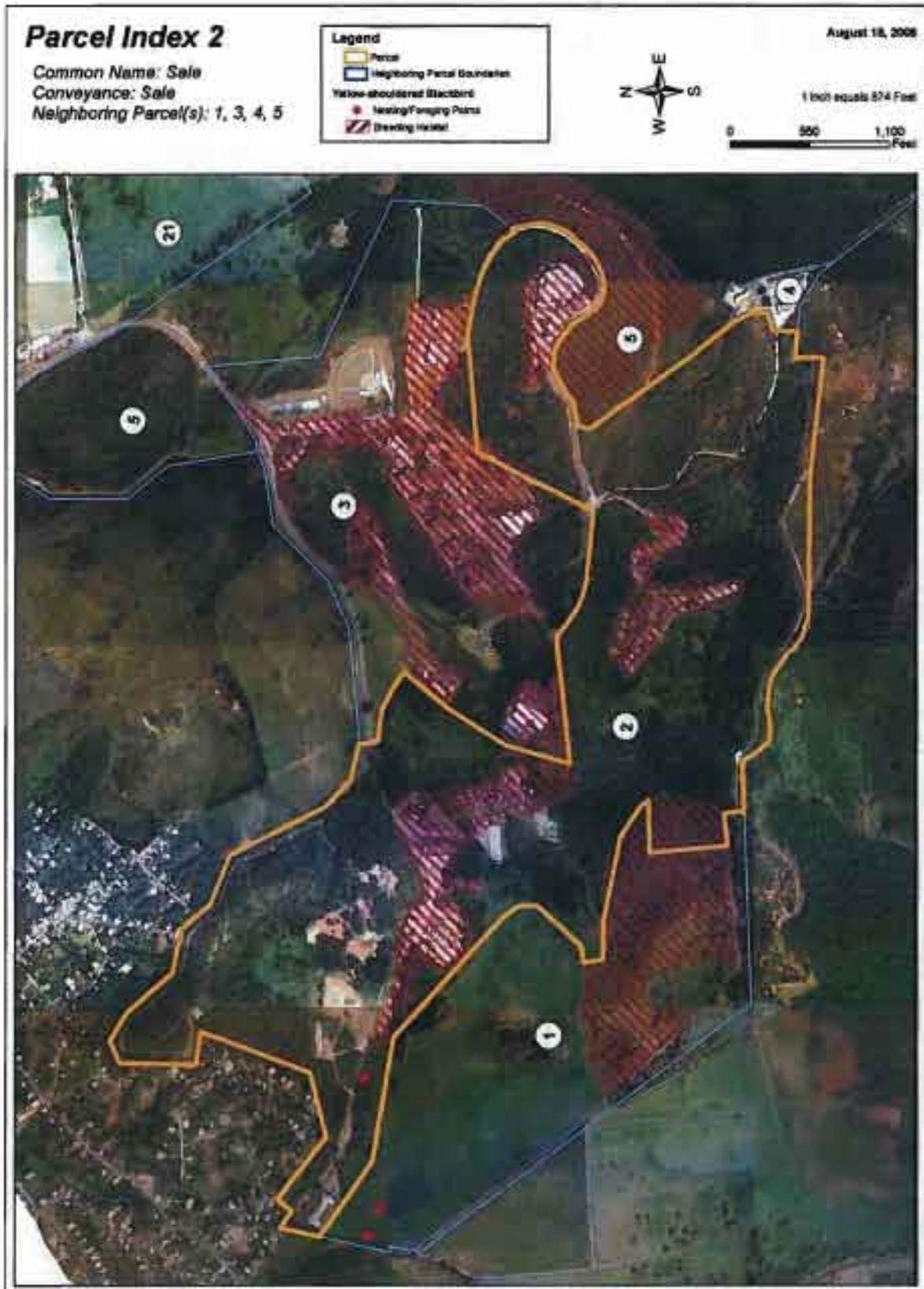
GENERAL REQUIREMENTS

- No development is allowed in Parcel 1 and 5 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (1, 5) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- Notify the U.S. Fish and Wildlife Service (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.
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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 2

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 1, 3, 4, 5

Legend

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



August 18, 2006

1 inch equals 874 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 3

**Common Name—Federal
Conveyance—Fed
Neighboring Parcel(s)—2,6**

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.

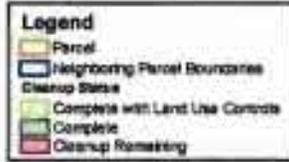
NOTICE:

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 3

Common Name: Federal
Conveyance: Fed
Neighboring Parcel(s): 2, 5



August 18, 2006

1 inch equals 500 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 17

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—5, 16, 25

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Zone 5 and 16 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (5, 16) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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 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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 17

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 16, 25

Legend

-  Parcel
-  Neighboring Parcel Boundary
-  Yellow-stippled District
-  Nesting/Foraging Pairs
-  Breeding Habitat

August 18, 2008



1 inch equals 250 Feet



Parcel Index 17

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 16, 25

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

August 18, 2008

1 inch equals 250 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 19

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—5, 20

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 5 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (5) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 19

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 20

Legend

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

August 18, 2008



1 inch equals 667 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 21

Common Name—Golf Course
Conveyance—Sale
Neighboring Parcel(s)—5, 22

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 5 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (5) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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.
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).
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.

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 21

Common Name: Golf Course
Conveyance: Sale
Neighboring Parcel(s): 5, 22

Legend

-  Parcel
-  Neighboring Parcel Boundaries
-  Yellow-shaded Backland
-  Nesting/Foraging Pairs
-  Breeding Habitat

August 18, 2006



1 inch equals 213 Feet

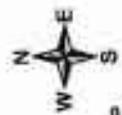


Parcel Index 21

Common Name: Golf Course
Conveyance: Sale
Neighboring Parcel(s): 5, 22

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

August 18, 2006



1 inch equals 813 Feet



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

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THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 22

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—5, 21, 33

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 5 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (5) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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.
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).
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.

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 22

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 21, 33

Legend

- Parcel
- Neighboring Parcel Boundaries
- Yellow-shouldered Blackbird
- Hesting/Foraging Pairs
- Breeding Habitat



August 18, 2006

1 inch equals 576 Feet



Parcel Index 22

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 21, 33

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



August 18, 2006

1 inch equals 510 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 25

Common Name—Sale

Conveyance—Sale

Neighboring Parcel(s)—5, 13, 6-18, 20, 26-29

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 5, 13, 16, and 28 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (5, 13, 16, 28) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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 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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 25

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 13, 16-18,
20, 26-29

Legend

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



August 18, 2008

1 inch equals 1,000 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 27

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—5, 25, 29, 31, 33

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 5 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcel 5 should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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 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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 27

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 25, 29,
31, 33

Legend

-  Parcel
-  Neighboring Parcel Boundaries
-  Yellow-dashed-lined Blackline
-  Nesting/Foraging Pairs
-  Breeding Habitat



August 18, 2008

1 inch equals 250 Feet



Parcel Index 27

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 25, 29,
31, 33

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

August 18, 2008



1 inch equals 950 Feet



Exhibit D
Survey Maps

SURVEY NOTES

- BOUNDARY SURVEY PREPARED BY TRANSSYSTEM CORPORATION FROM FIELD DATA COLLECTED IN 2008 AND 2007. FIELD PROVISIONAL CALCULATIONS AND FINAL PLAN HAVE BEEN REVIEWED FOR CONTENT BY LEO BERRIOS MONTES & ASSOCIATES OF VIEJA S.A. PUBLIC REG.
- HORIZONTAL COORDINATES SHOWN HEREIN ARE IN FEET AND REFER TO THE NORTH AMERICAN 1983 DATUM (NAD 83) PLANE (GEOGRAPHIC SYSTEM AND 40 (1983) HORIZONTALS). HORIZONTAL COORDINATES WERE DERIVED FROM DATA PROVIDED BY THE FOLLOWING AND ARE REFERENCED TO NATIONAL GEODESIC SURVEY MONUMENTS AEGIS (790 480000), ELANCO (790 080000), HONOLULU 1 (790 400000) AND BY BRITISH (790 400000).
- THE FOLLOWING PLATS AND DEEDS WERE USED TO ESTABLISH THE BOUNDARY (AND AS MENTIONED IN THIS PLAN):
 - AL PLAT FILED UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD BOUNDARY REESTABLISHMENT SURVEY PROVIDED BY TRANSSYSTEM CORPORATION AND LEO BERRIOS MONTES, MAPING DRAWING NO. 4220200 QUOTE FEBRUARY 01, 2008.
- PLANIMETRIC DATA AND DIMENSIONS PROVIDED BY REGULAR CLERK ASSOCIATES PORTSMOUTH, VA AERIAL SURVEY PHOTOGRAPHY BY AERO-SPATIAL CORPORATION CHARLOTTE N.C. SURVEY FLOWN FEBRUARY 1988.
- NOTE THAT PLAT SHOWS DIMENSIONS OF RECORD PLANNED IN THE NAVY REAL ESTATE OFFICE. THIS PLAN MAY NOT SHOW ALL DETAILS OR DIMENSIONS THAT WOULD AFFECT SUBJECT PROPERTY.

CERTIFICATION

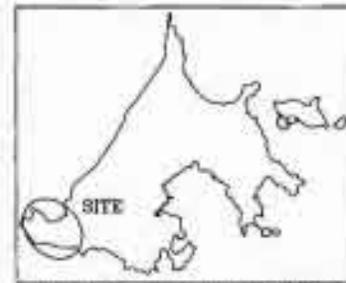
I, LEO BERRIOS MONTES, CERTIFY THAT THE INFORMATION THAT FOLLOWS REPRESENTS FAITHFULLY WHAT I FOUND PERSONALLY BY THE EXAMINE JULY/08 BY THE INVESTIGATION THAT HAS BEEN MADE BY ME.

DATE: 7/1/08
 LEO BERRIOS MONTES
 SURVEYOR LICENSE NO. 9000



LOCATION MAP

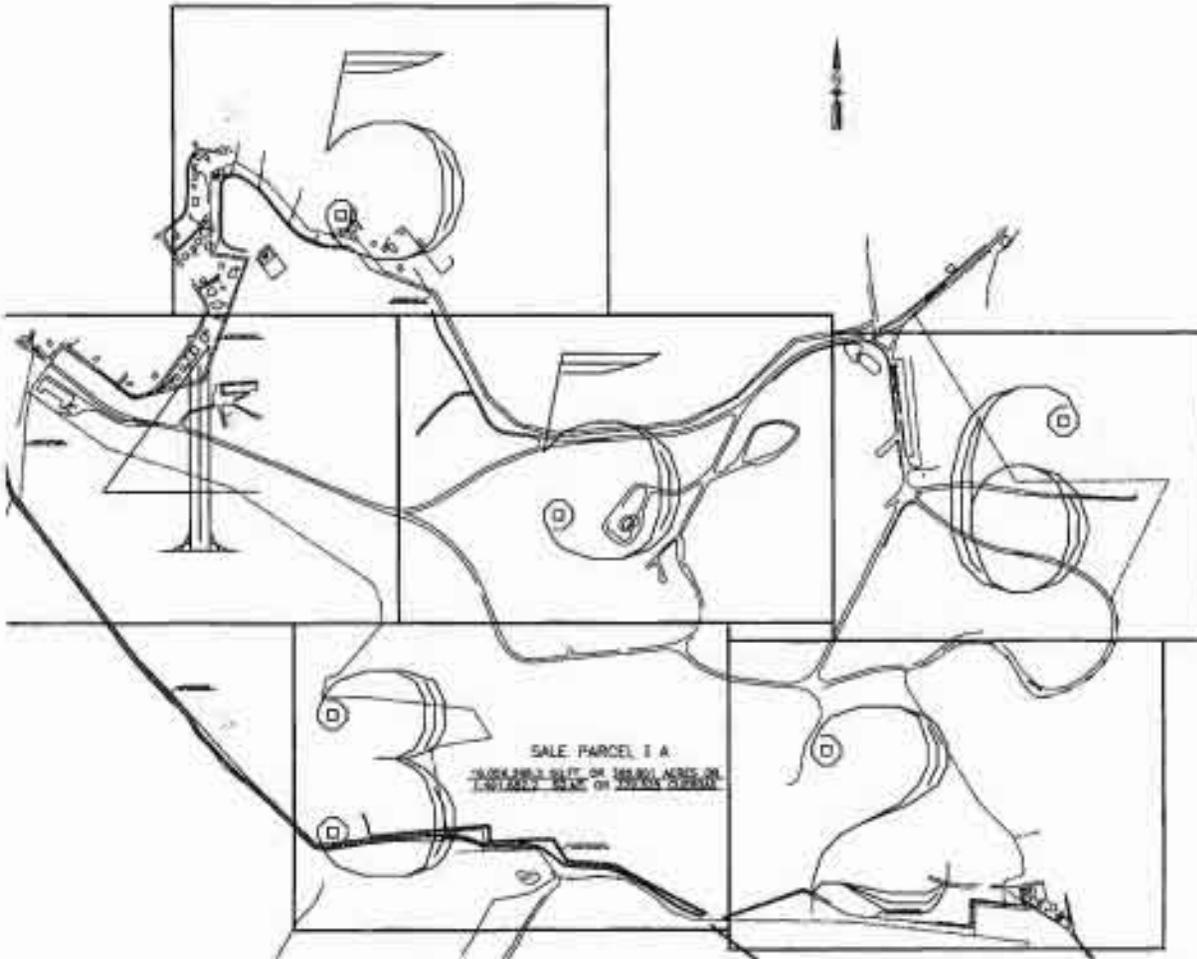
NOT TO SCALE



NAVAL ACTIVITY PUERTO RICO

NOT TO SCALE

- LEGEND**
- CENTRAL GOVERNMENT PLATE
 - ROAD AND SET
 - PROPERTY LINE
 - TRAIL LINE



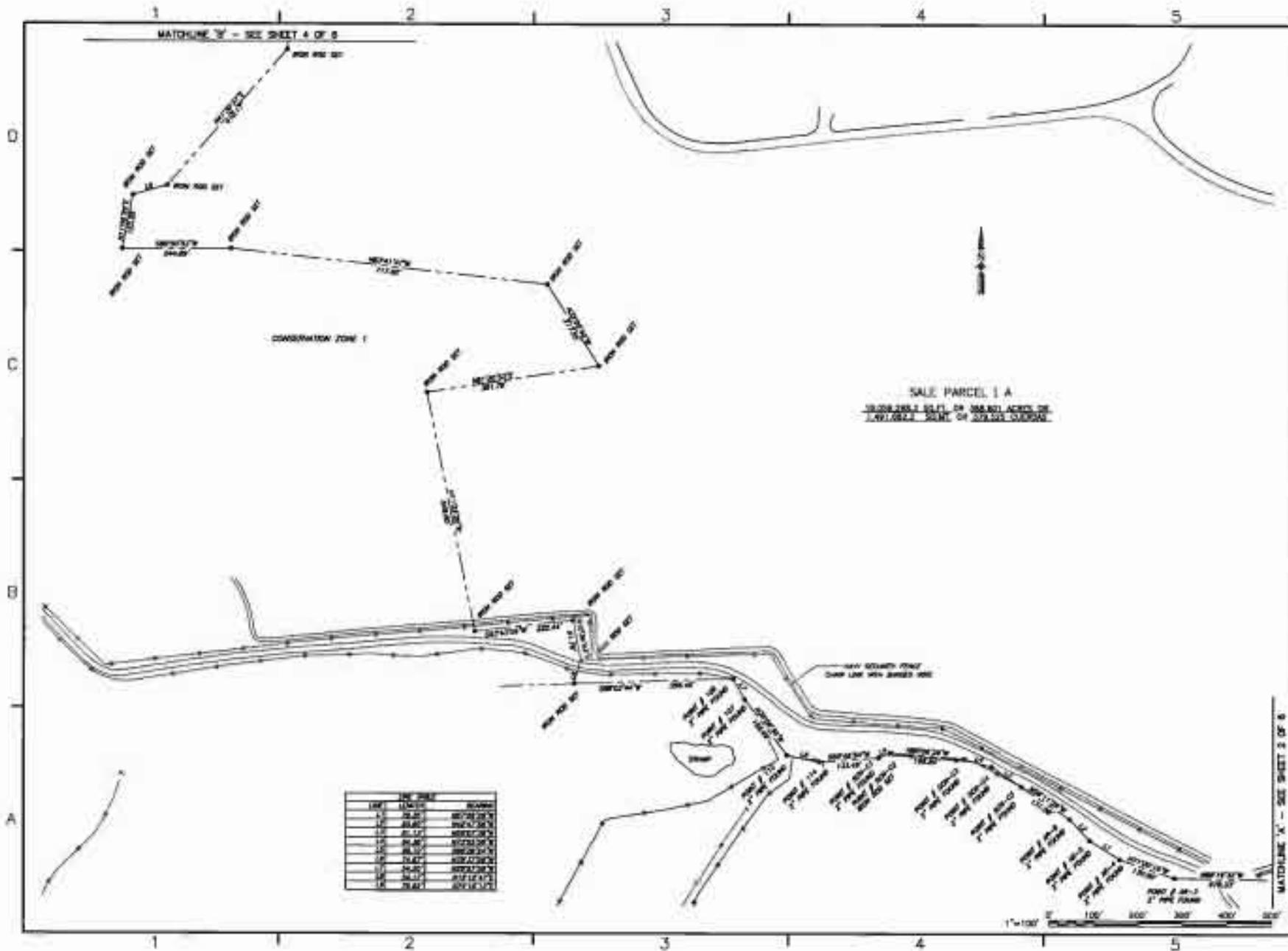
SALE PARCEL I A
 FORMER NAVAL STATION ROOSEVELT ROAD
 FORMER NAVAL STATION ROOSEVELT ROAD

TransSystems
 1000 West Avenue, Suite 100
 San Juan, Puerto Rico 00906
 Phone: 787-762-1111
 Fax: 787-762-1112
 www.transystems.com

ATLANTIC SHADON
 1000 West Avenue, Suite 100
 San Juan, Puerto Rico 00906
 Phone: 787-762-1111
 Fax: 787-762-1112
 www.transystems.com

SEAL
 LEO BERRIOS MONTES
 SURVEYOR LICENSE NO. 9000
 STATE OF PUERTO RICO

UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROAD
SALE PARCEL I A



Matchline 'C' - SEE SHEET 4 OF 6

Matchline 'A' - SEE SHEET 2 OF 6

TRANS SYSTEMS
 1000 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Phone: 404.525.1234
 Fax: 404.525.1235
 www.transystems.com

ATLANTIC DIVISION
 NAVAL ACTIVITY PLANNING AND DESIGN CENTER
 1000 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Phone: 404.525.1234
 Fax: 404.525.1235
 www.navy.mil

SALE PARCEL 1 A

LEGEND

SCALE

DATE

PROJECT

NO. 1

NO. 2

NO. 3

NO. 4

NO. 5

NO. 6

NO. 7

NO. 8

NO. 9

NO. 10

NO. 11

NO. 12

NO. 13

NO. 14

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NO. 34

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NO. 81

NO. 82

NO. 83

NO. 84

NO. 85

NO. 86

NO. 87

NO. 88

NO. 89

NO. 90

NO. 91

NO. 92

NO. 93

NO. 94

NO. 95

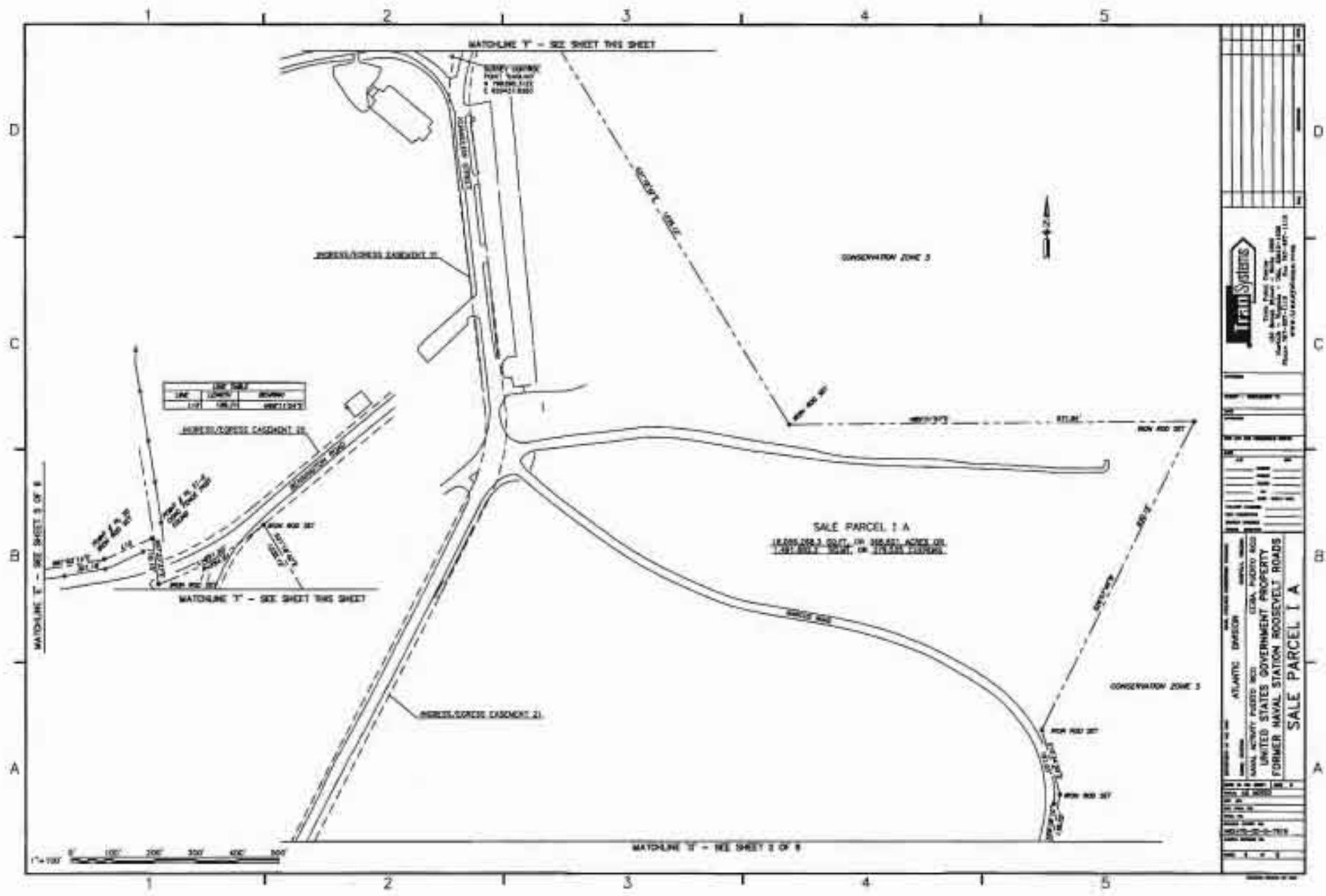
NO. 96

NO. 97

NO. 98

NO. 99

NO. 100



DATE	BY	REVISION
1/11/11
1/11/11

TranSystems
 10000 ...
 ...
 ...

ATLANTIC DIVISION
 MAJOR PROJECT NUMBER: ...
 MAP NUMBER: ...
 PROJECT TITLE: ...
 SALE PARCEL 1 A

UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROAD

LEGAL DESCRIPTION FOR SALE PARCEL 1A

Beginning at a survey control point in the Ward of Daguao, said point being a brass disk set in concrete. Said point also known as 'MANATI' and having a northing of 791059.1339 and an easting of 921490.5759 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL 1A". Thence N40°26'39"W 2045.54' to point # 26-43 a 2" pipe found, the True Point of Beginning, having a northing of 792,615.8677 and an easting of 920,163.6158:

Thence N89°19'32"W 978.33' to point # AR-3 a 2" pipe found;
Thence N71°00'16"W 130.50' to point # AR-4 a 2" pipe found;
Thence N57°58'26"W 79.35' to point # AR-5 a 2" pipe found;
Thence N42°47'56"W 65.85' to point # AR-6 a 2" pipe found;
Thence N56°11'26"W 131.08' to point # SCN-C5 a 2" pipe found;
Thence N56°07'36"W 81.13' to point # SCN-C4 a 2" pipe found;
Thence N73°55'56"W 64.38' to point # SCN-C3 a 2" pipe found;
Thence N85°06'36"W 166.84' to point # SCN-C2 an iron rod set;
Thence S66°29'24"W 28.10' to point # SCN-C1 a 2" pipe found;
Thence S85°48'54"W 133.49' to point # 114 a 2" pipe found;
Thence N78°37'06"W 74.67' to point # 110 a 2" pipe found;
Thence N36°58'36"W 158.99' to point # 107 a 2" pipe found;
Thence N29°57'56"W 54.20' to point # 109 a 2" pipe found;
Thence S88°03'44"W 358.46' to an iron rod set;
Thence N15°12'47"E 54.17' to an iron rod set;
Thence N10°34'42"W 91.78' to an iron rod set;
Thence S83°43'09"W 222.44' to an iron rod set;
Thence N11°22'22"W 548.80' to an iron rod set;
Thence N81°20'53"E 391.79' to an iron rod set;
Thence N32°25'40"W 217.55' to an iron rod set;
Thence N83°41'47"W 717.92' to an iron rod set;
Thence S89°50'53"W 244.89' to an iron rod set;
Thence N11°06'26"E 123.28' to an iron rod set;
Thence N74°18'13"E 79.62' to an iron rod set;
Thence N41°30'37"E 410.17' to an iron rod set;
Thence N04°18'45"E 132.39' to an iron rod set;
Thence N21°43'36"W 148.72' to an iron rod set;
Thence N56°08'19"W 1097.24' to an iron rod set;
Thence N72°25'35"W 824.78' to an iron rod set;
Thence N54°58'40"W 628.94' to an iron rod set;
Thence N12°30'34"E 202.42' to point # F85-10 a 2" pipe found;
Thence N09°22'44"E 77.71' to point # N-PL-1-A an iron rod set;
Thence S56°25'46"E 143.44' to point # N-58-A a 2" pipe found;
Thence N37°49'53"E 101.30' to point # 58 an iron rod set;
Thence N52°22'24"E 27.21' to point # PL-2 an iron rod set;
Thence S51°57'26"E 539.85' to point # PL-3 an iron rod set;
Thence N75°36'24"E 456.65' to point # PL-4 a 2" pipe found;
Thence N20°35'13"E 801.21' to point # PL-5 an 8" concrete fence post found;
Thence N82°35'36"W 230.00' to point # PL-6 an iron rod set;
Thence N01°18'34"E 525.27' to point # PL-7 a 2" pipe found;
Thence N67°17'34"E 167.99' to point # PL-8 a 8" concrete fence post found;
Thence S58°23'36"E 226.77' to point # PL-9 a 2" pipe found;
Thence S41°00'16"E 406.89' to point # PL-10 an iron rod set;
Thence S77°42'16"E 316.92' to point # PL-11 an iron rod set;
Thence S40°51'06"E 257.74' to point # PL-12 a 8" concrete fence post found;
Thence S68°30'46"E 359.57' to point # PL-13 an iron rod set;
Thence S26°54'16"E 733.46' to point # PL-14 an iron rod set;

Thence S47°00'46"E 258.16' to point # PL-15 an iron rod set;
Thence S76°44'46"E 265.45' to point # PL-16 an iron rod set;
Thence N84°41'44"E 805.00' to point # PL 17 an iron rod set;
Thence N64°49'14"E 360.96' to point # PL 18 an iron rod set;
Thence N45°37'44"E 529.92' to point # PL 19 an iron rod set;
Thence N81°02'14"E 391.16' to point # PL 20 an iron rod set;
Thence N66°11'04"E 128.31' to point # PL 21-E a 8" concrete fence post found;
Thence S07°23'37"E 110.15' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 290.24', chord bearing of N60°50'32"E

Radius=784.61'

Arc=291.92'

Thence S31°18'42"E 1235.12' to an iron rod set;
Thence N89°31'57"E 971.84' to an iron rod set;
Thence S26°07'48"W 830.15' to an iron rod set;
Thence S15°34'55"E 161.03' to an iron rod set;
Thence S09°38'10"W 138.52' to an iron rod set;
Thence S27°40'16"W 126.84' to an iron rod set;
Thence S43°10'40"W 143.52' to an iron rod set;
Thence S60°56'27"W 164.43' to an iron rod set;
Thence S72°38'10"W 155.86' to an iron rod set;
Thence S85°40'08"W 36.17' to an iron rod set;
Thence N60°31'49"W 57.39' to an iron rod set;
Thence N38°22'55"W 95.89' to an iron rod set;
Thence N28°50'18"W 46.13' to an iron rod set;
Thence N28°14'11"W 117.18' to an iron rod set;
Thence N50°04'49"W 165.20' to an iron rod set;
Thence S87°57'20"W 195.91' to an iron rod set;
Thence S57°51'11"W 248.88' to an iron rod set;
Thence S74°46'28"W 140.72' to an iron rod set;
Thence S07°43'22"E 105.67' to an iron rod set;
Thence S32°01'24"E 805.95' to an iron rod set;
Thence S30°07'40"E 55.68' to an iron rod set;
Thence S45°14'12"E 320.47' to an iron rod set;
Thence S22°18'51"E 147.92' to an iron rod set;
Thence S02°06'09"E 95.02' to an iron rod set;
Thence S71°27'43"W 135.81' to an iron rod set;
Thence S01°18'44"E 165.75' to an iron rod set;
Thence N84°32'30"W 185.80' to point # 8 an iron rod set;
Thence S00°05'23"W 196.16' to point # 9 an iron rod found;
Thence N83°34'06"W 820.00' to point # 26-43 a 2" pipe found, the True Point of Beginning.

Said parcel containing 16,056,268.3 square feet or 368.601 acres, which equates to 1,491,682.2 square meters or 379.525 cuerdas.

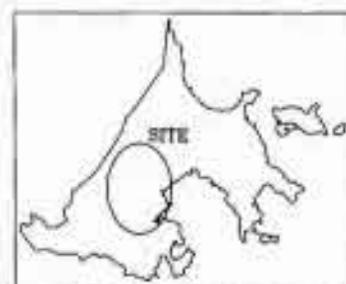
Said parcel is subject to the following easement as shown on plat titled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 21" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on XX, 2007.

SURVEY NOTES

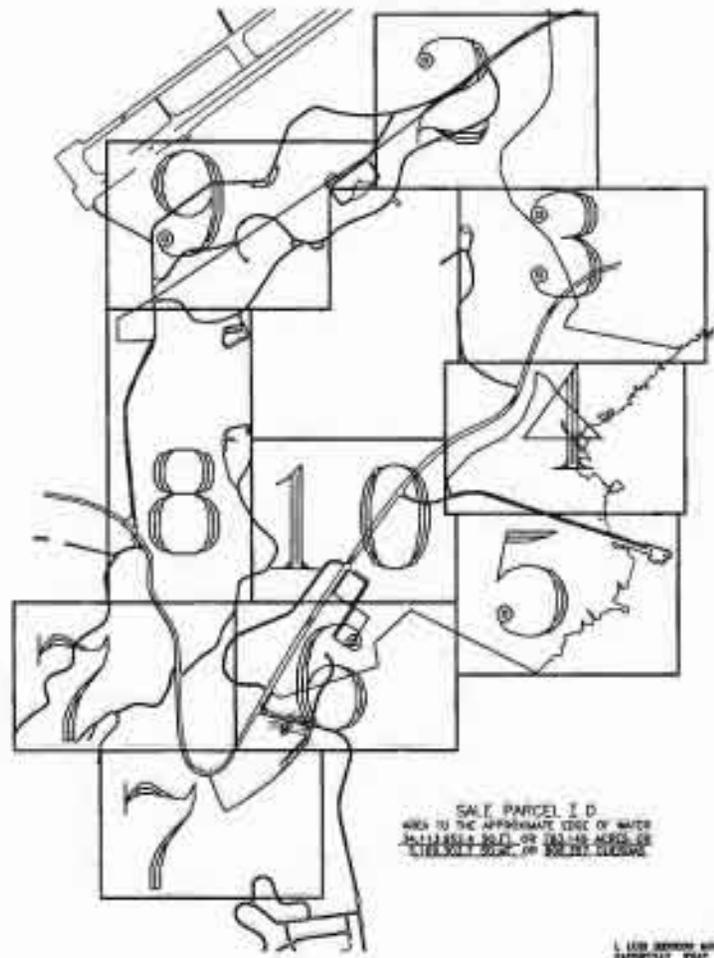
1. BOUNDARY SURVEY PREPARED BY TRANSCONTINENTAL CORPORATION FROM FIELD DATA COLLECTED BY 1958 AND 1967. FIELD PROCEDURES, CALCULATIONS AND FINAL PLAN HAVE BEEN REVIEWED FOR COMPLEY BY LEO BERNER, SURVEYOR & ASSOCIATES OF P.R.A. INC., P.R.A. INC.
2. HORIZONTAL COORDINATE SYSTEM HERRON METRIC IS USED AND REFER TO THE PLATE NO. 15000000 (SHEET 15000000) COORDINATE SYSTEM HAS AN OFFSET ADJUSTMENT. HORIZONTAL COORDINATE WERE DERIVED FROM DATA PROVIDED ONE SOURCE AND ARE REFERENCED TO HERRON METRIC SURVEY MONUMENTS AVILA (2ND AVENUE), FARRAGO ONE AVENUE, FARRAGO 2 (2ND AVENUE) AND AT BOSTON (2ND AVENUE).
3. THE FOLLOWING PLATS AND DEEDS WERE USED TO CORRELATE THE BOUNDARY LINES AS SHOWN ON THIS PLAN:
 - a. PLAT 11020 "LANDS BELONGING TO THE PROPERTY FORMERLY OWNED BY THE ROOSEVELT HOTEL" BOUNDARY RECONSTRUCTION SURVEY PREPARED BY TRANSCONTINENTAL CORPORATION AND LEO BERNER SURVEYOR. DATE: 10/20/00 DATED FEBRUARY 15, 2000.
 - b. PLANNING DECISION AND CHARTER PREPARED BY BUREAU OF LAND MANAGEMENT, DEPARTMENT OF AGRICULTURE, FOREST SERVICE, WASHINGTON, D.C. DATED FEBRUARY 15, 2000.
4. THE TO BE SPECIALIZED CASES OF THE SUBJECT PROPERTY, TECHNICAL-BARRIERS REGULATIONS ARE APPLICABLE AS A ONE OF THE NON-COMMERCIAL ALL FORMS OF THE SUBJECT PROPERTY BY SUBSEQUENT FROM REGULATIONS OF THE BUREAU OF LAND MANAGEMENT TO THE FEDERAL-BARRIERS CASE REGULATIONS. THE PUBLIC ACCESS TO PROPERTY TRANSFERRED TO OTHER FEDERAL AGENCIES SHALL REMAIN STATUS AS IS.
5. NOTE THIS PLAN SHOWS ENCLOSURES OF RECORD FORMS IN THE MAP AREA OFFICE. THE PLAN MAY NOT SHOW ALL DETAILS OR ENCLOSURES THAT COULD AFFECT SUBJECT PROPERTY.



LOCATION MAP
NOT TO SCALE



NAVAL ACTIVITY PUERTO RICO
NOT TO SCALE



SALE PARCEL I D
ARE TO THE APPROXIMATE EDGE OF WATER
JULY 1954 AND OF 180-000 ACRES OF
THE VILLAGE OF SAN JUAN, P.R.



CERTIFICATION

I, LEO BERNER, SURVEYOR, CERTIFY THAT THE INFORMATION THAT FOLLOWS REPRESENTS THE RESULTS OF A SURVEY PERFORMED BY THE SURVEYOR AND BY THE BUREAU OF LAND MANAGEMENT, DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT, P.R.A. INC.

Date: 1/15/07
Leo Berner
LEO BERNER SURVEYOR
BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR
P.R.A. INC.

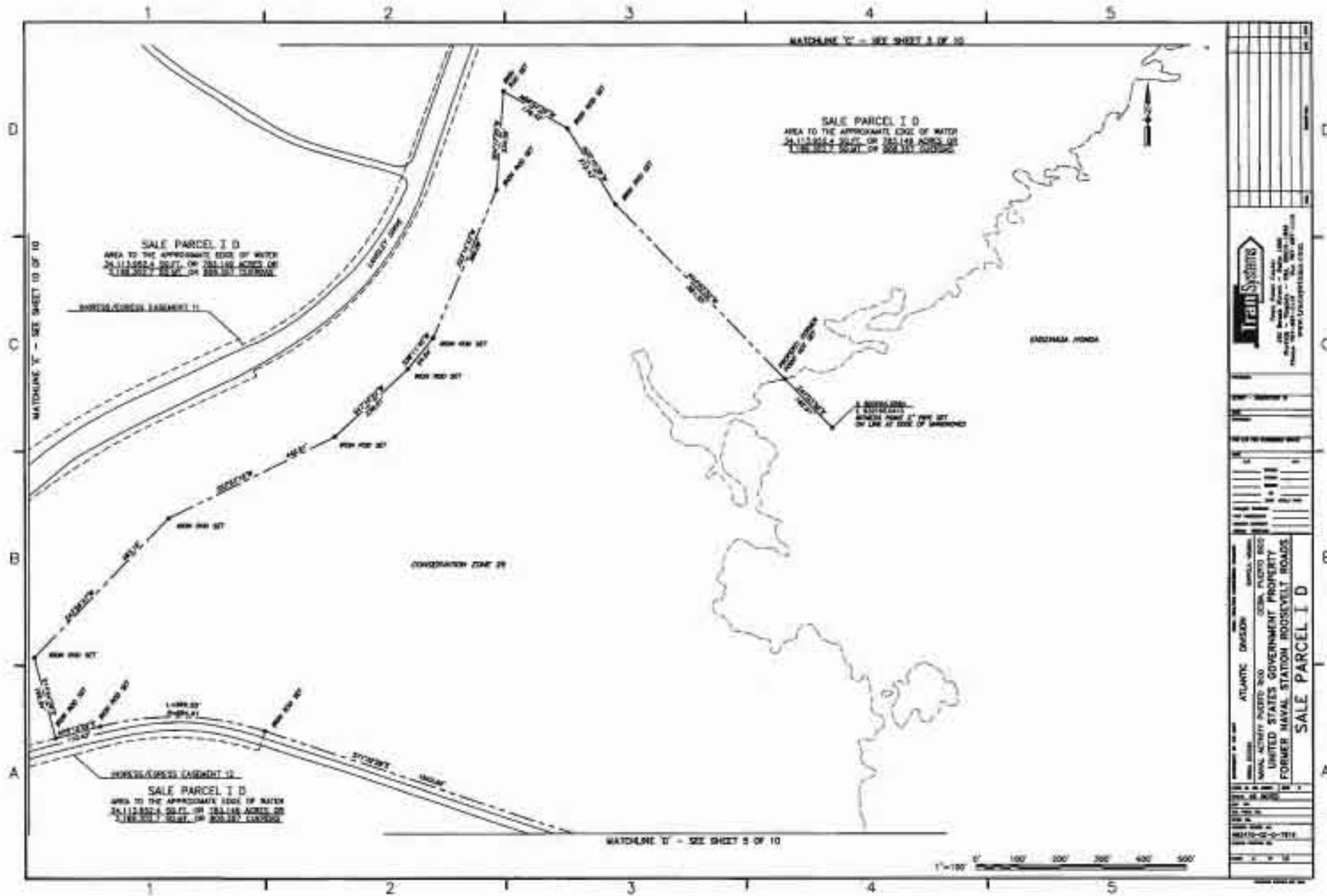
LEO BERNER SURVEYOR
BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR
P.R.A. INC.

LEGEND
CONCRETE MONUMENT TOWER
IRON AND STEEL
PROPERTY LINE
EASEMENT LINE

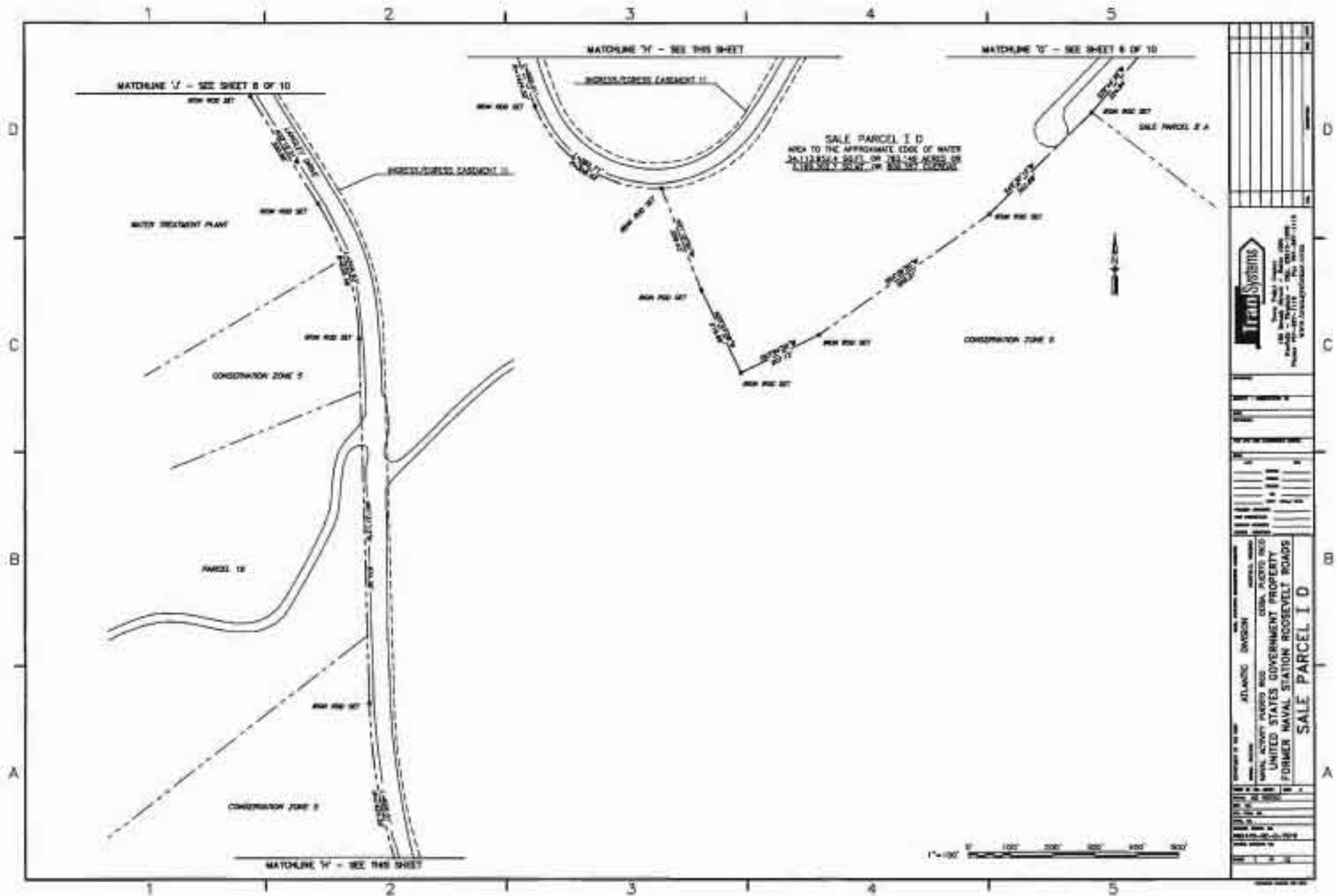
TransSystems
Survey, Mapping, Design, Construction
100 West Street, Suite 1000
San Juan, Puerto Rico 00901
Phone: (787) 427-1111 Fax: (787) 427-1111
www.transystems.com

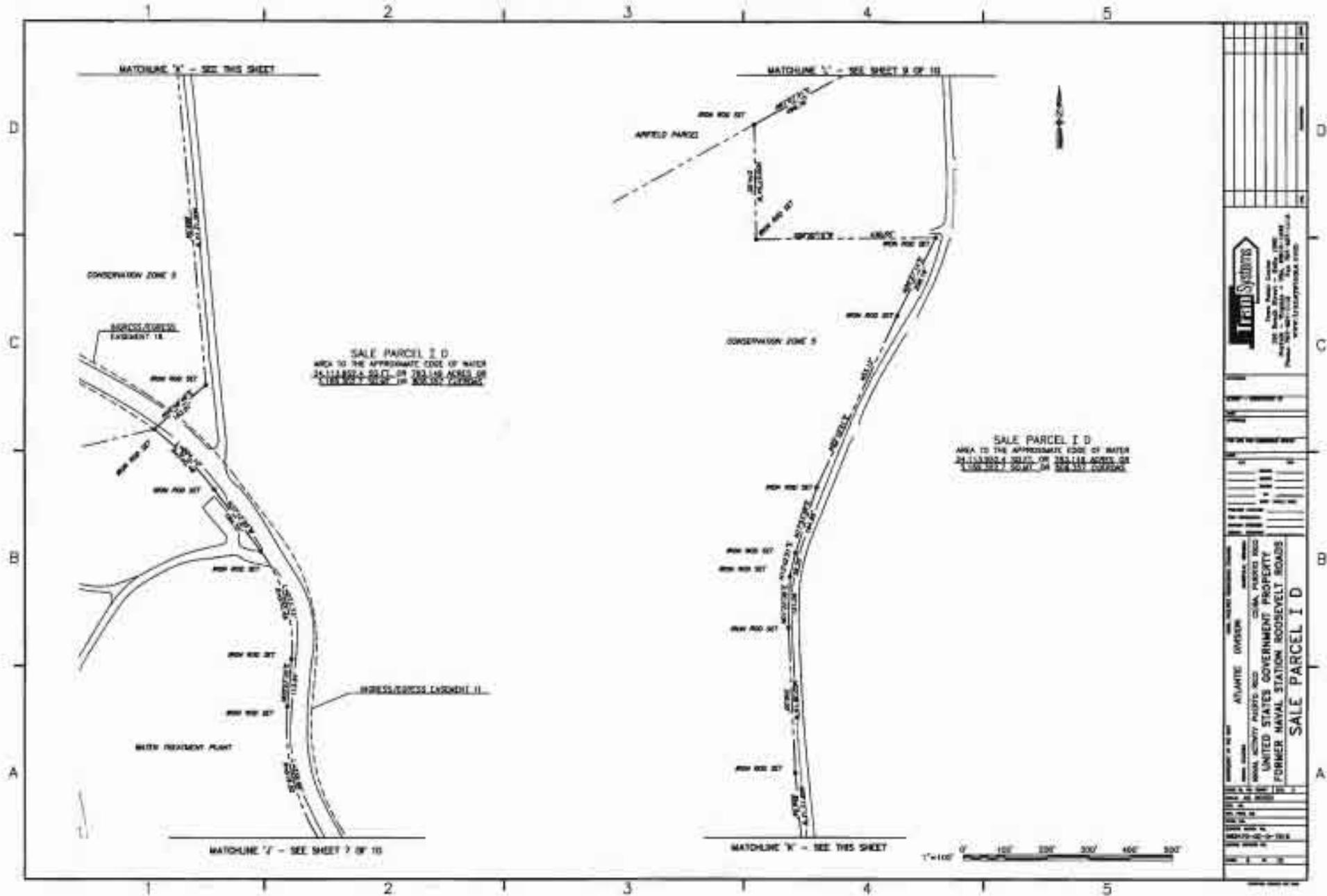
ATLANTIC DIVISION
NAVAL ACTIVITY, PUERTO RICO
UNITED STATES GOVERNMENT PROPERTY
FORMER NAVAL STATION ROOSEVELT BOARDS
SALE PARCEL I D

DATE OF SURVEY: 1/15/07
SCALE: AS SHOWN
SHEET NO.: 1 OF 1
PROJECT NO.: 100-000-0000
DRAWN BY: LEO BERNER
CHECKED BY: LEO BERNER
DATE: 1/15/07



4000 S. Highway 101, Suite 100 San Diego, CA 92108 www.transystems.com	
ATLANTIC DIVISION NAVAL SURVEY CENTER 300 3000 PALM BEACH UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD SALE PARCEL I D	
DATE: 10/10/10 DRAWN BY: J. J. JONES CHECKED BY: J. J. JONES SCALE: AS SHOWN SHEET NO. 1 OF 10	



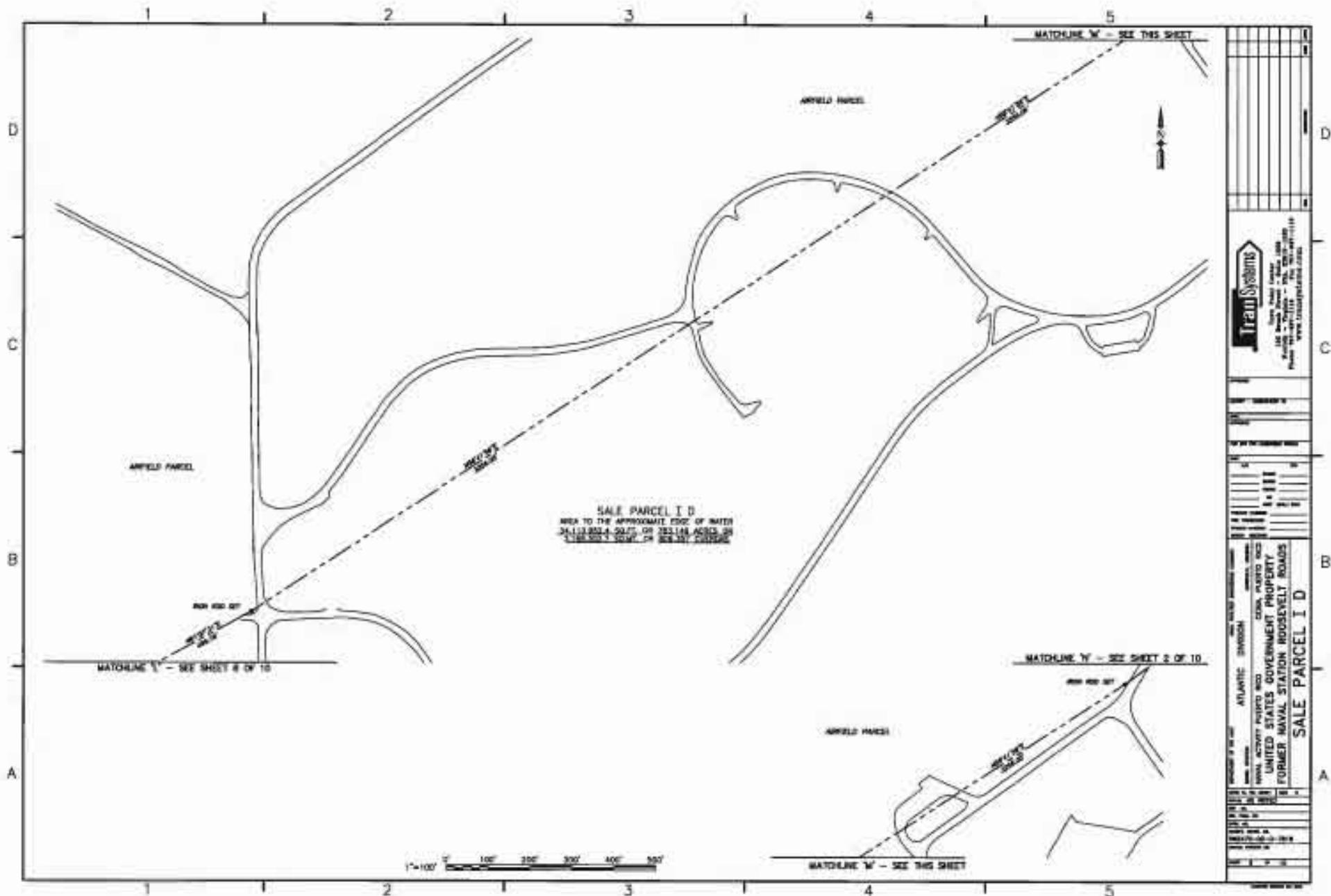


SALE PARCEL I D
 AREA TO THE APPROXIMATE EDGE OF WATER
 24.113824 ACRES OR 283.114 ACRES OF
 1.124824 SQ. FT. IN 283.114 ACRES OF

SALE PARCEL I D
 AREA TO THE APPROXIMATE EDGE OF WATER
 24.113824 ACRES OR 283.114 ACRES OF
 1.124824 SQ. FT. IN 283.114 ACRES OF

1"=100'
 0 100 200 300 400 500

200 Peach Street - Suite 1000 Atlanta, Georgia 30303 www.trapsystems.com	
SALE PARCEL I D	
ATLANTIC DIVISION UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT BOARDS	CHINA, PARCEL NO. 10



SALE PARCEL I D
 AREA TO THE APPROXIMATE EDGE OF WATER
 34-113-202-4-20-07, 08, 283-118 ACRES, 28
 1-18-2011 SCALD. OF 283-118, COUSINE



PROJECT NO. 10000 10th Street, Suite 100, San Diego, CA 92121
 DATE 10/10/11
 DRAWN BY [redacted]
 CHECKED BY [redacted]
 APPROVED BY [redacted]
 ATLANTIC DIVISION
 NAVAL ACTIVITY PLANNING BRANCH
 NAVAL PLANNING BRANCH
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROADS
SALE PARCEL I D

LEGAL DESCRIPTION
SALE PARCEL 1 D

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DOG' and having a northing of 805443.8964 and an easting of 933110.4735 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL 1 D". Thence S79°51'07"W 1568.79' to an iron rod set, the True Point of Beginning, having a northing of 805167.4912 and an easting of 931566.2267:

Thence S02°46'27"E 590.00' to an iron rod set;
Thence S05°53'40"W 271.67' to an iron rod set;
Thence S29°31'45"W 194.85' to an iron rod set;
Thence S39°30'31"W 232.03' to an iron rod set;
Thence S45°30'46"W 496.11' to an iron rod set;
Thence S07°23'02"W 253.47' to an iron rod set;
Thence S20°25'28"E 446.10' to an iron rod set;
Thence S45°57'09"E 649.51' to an iron rod set;
Thence S27°14'03"E 434.71' to an iron rod set;
Thence S19°58'29"E 96.01' to an iron rod set;
Thence S21°17'11"E 166.07' to an iron rod set;
Thence S16°28'24"E 198.53' to an iron rod set;
Thence S43°11'29"W 174.48' to an iron rod set;
Thence S19°31'06"W 146.30' to an iron rod set;
Thence S79°34'23"E 1457.64' to a point not set, said point referenced by a 2" pipe set at the edge of the mangroves bearing S79°34'23"E 40.93';
Thence Southwest 1481' from said point not set, along the approximate edge of water of Ensenada Honda to a point not set, said point referenced by a 2" pipe with a northing of 800054.0594 and an easting of 932165.0410 set at the edge of mangroves and bearing S44°03'52"E 162.91' from point not set;
Thence from said point not set, N44°03'52"W 581.55' to an iron rod set;
Thence N32°10'38"W 212.43' to an iron rod set;
Thence N59°52'22"W 176.42' to an iron rod set;
Thence S04°17'25"W 234.59' to an iron rod set;
Thence S23°14'43"W 386.08' to an iron rod set;
Thence S39°11'40"W 94.84' to an iron rod set;
Thence S47°10'22"W 239.01' to an iron rod set;
Thence S63°53'18"W 442.91' to an iron rod set;
Thence S43°59'47"W 463.19' to an iron rod set;
Thence S14°44'58"E 199.54' to an iron rod set;
Thence N75°15'02"E 110.43' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 394.07', chord bearing of S88°16'14"E
 Radius=694.61'
 Arc=399.55'
Thence S71°32'28"E 1543.06' to an iron rod set;
Thence N25°50'42"E 45.93' to a 2" pipe set at the approximate edge of water of Ensenada Honda;
Thence Southeast along the approximate edge of water of Ensenada Honda;
Thence Southwest along the approximate edge of water of Ensenada Honda 2250' to a 2" pipe set having a northing of 797111.1030 and an easting of 931373.0768;
Thence N63°38'46"W 1745.64' to an iron rod set;
Thence S48°34'58"W 613.72' to an iron rod set;
Thence S10°14'29"E 293.26' to an iron rod set;
Thence S72°32'16"W 1288.66' to an iron rod set;
Thence N59°48'07"W 125.93' to an iron rod set;
Thence S30°14'21"W 293.69' to an iron rod set;

Thence S75°02'51"E 675.18' to an iron rod set;
Thence S17°59'43"W 176.84' to an iron rod set;
Thence S39°44'38"W 324.94' to an iron rod set;
Thence S45°30'15"W 342.88' to an iron rod set;
Thence S54°39'50"W 500.21' to an iron rod set;
Thence S63°54'50"W 207.12' to an iron rod set;
Thence N25°23'08"W 219.99' to an iron rod set;
Thence N21°18'50"W 259.43' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 358.79', chord bearing of N57°08'01"W
 Radius=309.52'
 Arc=382.71'
Thence following a curve to an iron rod set with a long chord of 499.41', chord bearing of N11°36'57"W
 Radius=1424.52'
 Arc=502.01'
Thence N01°31'13"W 874.38' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 336.85', chord bearing of N16°53'22"W
 Radius=635.48'
 Arc=340.93'
Thence N32°15'31"W 300.98' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 333.00', chord bearing of N13°33'58"W
 Radius=519.52'
 Arc=338.98'
Thence N05°07'35"E 113.24' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 267.55', chord bearing of N16°02'25"W
 Radius=370.48'
 Arc=273.73'
Thence N37°12'25"W 184.72' to an iron rod set;
Thence following a curve to an iron rod set with a long chord of 203.46', chord bearing of N45°06'13"W
 Radius=740.48'
 Arc=204.10'
Thence N49°48'46"E 163.61' to an iron rod set;
Thence N05°12'12"W 899.59' to an iron rod set;
Thence N02°39'18"W 348.58' to an iron rod set;
Thence N01°22'38"E 121.06' to an iron rod set;
Thence N13°42'21"E 58.26' to an iron rod set;
Thence N17°53'28"E 164.95' to an iron rod set;
Thence N25°10'41"E 453.12' to an iron rod set;
Thence N26°27'14"E 208.19' to an iron rod set;
Thence S89°20'10"W 430.55' to an iron rod set;
Thence N00°57'54"W 274.05' to an iron rod set;
Thence N61°07'31"E 496.76' to an iron rod set;
Thence N56°41'56"E 3256.05' to an iron rod set;
Thence N53°25'55"E 1445.50' to an iron rod set;
Thence N51°48'50"E 255.48' to an iron rod set;
Thence N50°58'22"E 234.13' to an iron rod set;
Thence N52°49'35"E 193.85' to an iron rod set;
Thence N53°57'58"E 184.34' to an iron rod set;
Thence N60°39'23"E 483.63' to an iron rod set, the True Point of Beginning.

Said parcel containing 34,113,952.4 square feet or 783.149 acres, which equates to 3,169,302.7 square meters or 806.357 cuerdas.

Said parcel SALE PARCEL 1 D does not include the following internal parcels:

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS BOWLING ALLEY". Thence N36°45'05"E 1804.73' to an iron rod set, the True Point of Beginning, having a northing of 798092.7913 and an easting of 928829.7380:

Thence following a curve to an iron rod set with a long chord of 186.10', chord bearing of N34°11'56"E

Radius=21850.79'

Arc=186.10'

Thence N34°18'35"E 163.30' to an iron rod set;

Thence S55°42'43"E 262.55' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 14.71', chord bearing of S10°38'54"E

Radius=10.39'

Arc=16.34'

Thence S34°24'56"W 337.39' to an iron rod set;

Thence N56°02'55"W 272.34' to an iron rod set, the True Point of Beginning;

Said parcel containing 95,112.3 square feet or 2.183 acres, which equates to 8,836.2 square meters or 2.248 cuerdas.

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "VETERANS HEALTH CLINIC". Thence N50°37'43"E 1,415.10' to an iron rod set, the True Point of Beginning, having a northing of 797544.4322 and an easting of 928843.8368:

Thence N34°24'56"E 458.65' to an iron rod set;

Thence S54°36'53"E 222.75' to an iron rod set;

Thence S34°51'57"W 455.75' to an iron rod set;

Thence N55°21'36"W 219.14' to an iron rod set, the True Point of Beginning.

Said parcel containing 101,012.8 square feet or 2.319 acres, which equates to 9,384.4 square meters or 2.388 cuerdas.

Said parcel SALE PARCEL 1 D is subject to multiple easements as shown on plats titled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 11" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on XXX 2007, "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 12" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on October 2, 2007 and "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 23" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on October 2, 2007.

19/0
17

Exhibit E

Tables

Table 1
Naval Activity Puerto Rico
Sale Parcel I FOST
Facilities List
Page 1 of 4

Facility #	Former User	Name	Area	Unit	Yr Built
86	PWD	WATER STGE TANKS TACAN SITE	-	-	1942
88A	PWD	MISC STORAGE	378	SF	1944
161	PWD	GENR BLDG FOR GMOC UHF-VHF	164	SF	1943
277	CUSTOMS	PIER FAC	650	SY	1943
292	PWD	GENERATOR BUILDING	-	-	-
296	NBS AFCN	TELEVISION STUDIO	6132	SF	1944
298	PWD	CISTERN FOR B-296	-	-	1944
299	PWD	WATER PUMP STA NORTH DELICIA	109	SF	1961
300	WEAPONS	SMALL ARMS/PYROTECH MAGAZINE	4000	SF	1943
301	WEAPONS	MAGAZINE/3HT4/	308	SF	1943
302	WEAPONS	MAGAZINE/1Y3/	4000	SF	1943
303	WEAPONS	MAGAZINE/124/	3111	SF	1943
305	WEAPONS	FUSE-DETONATOR MAGAZINE	140	SF	1943
306	WEAPONS	MAGAZINE	70	SF	1943
309	WEAPONS	FUSE-DETONATOR MAGAZINE	140	SF	1943
310	WEAPONS	MAGAZINE	140	SF	1943
311	WEAPONS	HIGH EXPLOSIVE MAGAZINE	1404	SF	1943
313	WEAPONS	HIGH EXPLOSIVES MAGAZINE	1404	SF	1943
314	WEAPONS	HIGH EXPLOSIVES MAGAZINES	1134	SF	1943
358	WEAPONS	PYROTECHNIC MAGAZINE RI	1000	SF	1943
359	WEAPONS	PYROTECHNIC MAGAZINE RI	1000	SF	1943
360	AIMD	JET BOOSTER	1000	SF	1943
384	WEAPONS	HIGH EXPLOSIVES MAGAZINE	1350	SF	1958
500	SOC SOUTH	US ARMY SOUTH	6569	SF	1959
501	SOC SOUTH	US ARMY SOUTH	1679	SF	1957
502	SOC SOUTH	SECURITY ADMIN OFFICE	3240	SF	1957
519	SOC SOUTH	C-3/7TH SFG ADMIN HDQTRS.	15704	SF	1962
529	MWR	MWR-ROOS RDS RIDERS	18240	SF	1957
532	NEX	ADMIN AND MAINTENANCE SHOP	-	-	-
535	PWD	WATER STGE TANKS AT BUNDY	5292	-	1957
598	MULTI	NAVSOUTH/NCIS/PHOTOLAB/SECURITY	27088	SF	1962
629	MWR	THEATRE	10060	SF	1957
640	MWR	PLAYING COURT - TENNIS	7200	SF	1957
641	MWR	BUNDY BASKETBALL COURTS	7200	SF	1957
643	MWR	PLAYING FIELD AND FAC	108900	SF	1961
646	SECURITY	GATEHOUSE #3	120	SF	1957
724	MULTI	HIDTA/NSGA/DEFENSE COURIER	7779	SF	1959
725	CBQ	BOQ TRAN PTY W3-W-5 & O3/ABV	11996	SF	1960
726	CBQ	BOQ TRAN W3/W5 & O3/ABOVE	21207	SF	1960

Table 1
Naval Activity Puerto Rico
Sale Parcel I FOST
Facilities List
Page 2 of 4

Facility #	Former User	Name	Area	Unit	Yr Built
727	CBQ	BOQ TRAN W3/W5 & O3/ABOVE	11996	SF	1960
728	CBQ	BOQ TRANS W3/W5 & O3/ABOVE	11901	SF	1960
729	MWR	FINNIGANS OFFICERS CLUB	13374	SF	1960
730	NEX	NEX CENTRAL WHSE	25051	SF	1960
731	CBQ	BEQ	31200	SF	1960
732	CBQ	UEPH	31200	SF	1960
733	CBQ	BEQ	31807	SF	1960
734	CBQ	BEQ	32899	SF	1960
735	MULTI	SOC SOUTH/ACSS/LIBRARY	29178	SF	1960
737	NAVCOMTELSTA	NAVCOMMSTA BUILDING	2650	SF	1959
748	PWD	BUS SHLTR SOFTBALL FIELD BUNDY	140	SF	1964
760	MWR	MISC STGE BY B#760	220	SF	1962
761	MWR	TOILET AT SOFTBALL FIELD	160	SF	1962
763	WEAPONS	MAGAZINE	-	-	-
764	WEAPONS	MAGAZINE - 7NC5	1200	SF	1962
765	WEAPONS	MAGAZINE - 7NC6	1200	SF	1962
766	WEAPONS	MAGAZINE - 7NC7	1200	SF	1962
773	PWD	BUS SHLTR LINGLEY/BNGTN S.	60	SF	-
784	PWD	TACAN UNIT/GEN BUILDING	484	SF	1966
789	MWR	GOLF COURSE	-	-	1966
894	SURFOPS	RANGE LIGHT TARGET PAD 2	-	-	1966
1665	WEAPONS	READY ISSUE MAG	48	SF	1967
1666	WEAPONS	READY ISSUE MAG	48	SF	1967
1667	WEAPONS	READY ISSUE MAG	48	SF	1967
1668	WEAPONS	READY ISSUE MAG	48	SF	1967
1674	AIMD	GND SUPPORT EQUIPT STORAGE	4000	SF	1969
1686	FBI	F. B. I. OFFICE	15890	SF	1970
1687	MWR	GYMNASIUM/FITNESS CENTER	18500	SF	1969
1688	CBQ	BOQ TRANS W1/W2 AND O1/O2	49685	SF	1969
1703	NBS AFCN	AM RADIO TRANSMITTER	130	-	1970
1705	PWD	SUBSTA BY OLD HOSP B598	-	-	1960
1761	MWR	PEDESTRIAN CROSSING BRIDGE	-	-	-
1762	PWD	BUS SHLTR N.W. TEL EXCH	140	SF	1972
1763	PWD	BUS SHLTR S.W. TEL EXCH	140	SF	1972
1766	NBS AFCN	TV STUDIO COMM ANTENNA	-	-	1972
1767	AFWTF	ANTENNA POLE SUPPTD/N DELI	-	-	1969
1768	AFWTF	ANTENNA POLE SUPPTD/N DELI	-	-	1969
1769	AFWTF	ANTENNA POLE SUPPTD/N DELI	-	-	1969
1770	AFWTF	ANTNA POLE SUPOTD/NDELI	-	-	1969

Table 1
Naval Activity Puerto Rico
Sale Parcel I FOST
Facilities List
Page 3 of 4

Facility #	Former User	Name	Area	Unit	Yr Bult
1771	AFWTF	ANTNA POLE SUPPTD/N DELI	-	-	1969
1796	NEX	NAVY EXCHANGE COMPLEX	82606	SF	1973
1927	WEAPONS	BOMB BUILD UP AREA	315	SF	1971
1962	MWR	SEC. STAGE BEHIND B504	396	SF	1977
1964	MWR	GOLF DRIVING RANGE	-	-	1970
1970	NEX	COMMISSARY & COMM WHSE BLDG	43688	SF	1979
1971	PWD	SWGE PUMP HSE BY B#1970	100	SF	1979
1991	PWD	STANDBY GENR BY SEC B#504	396	SF	1977
1999	PWD	SEWAGE PUMP STA AT GOLF CSE	-	-	1979
2006	PWD	GENERATOR BUILDING BY GATE 3	-	-	-
2016	PWD	GENR CEN ALARM LS 542	320	SF	1982
2017	PWD	GENER HOUSE BY LS 644/CENT	304	SF	1982
2023	WEAPONS	BOMB BUILD UP AREA	1000	SF	1974
2045	AIROPS (GED)	RADAR TWR/TURNTABLE TACAN	-	-	1985
2048	PWD	LIFT STA AT BUNDY TENNIS CTS	-	-	1983
2050	PWD	SEPTIC TANK/FIELD BY GATE 3	-	-	1983
2082	MWR	KENNEL	960	SF	1985
2085	ACSS	ELEMENTARY SCHOOL GYM	10400	SF	1986
2143	PWD	TRANSFORMER STA BY B#1688	-	-	1974
2145	PWD	TRANSFORMER STA BY B#724	300	SF	1962
2153	PWD	SUB-STA "D" BY LANGLEY DRIVE	-	-	1976
2177	PWD	ELECTRICAL EQUIPMENT SHELTER	169	SF	-
2202	FSC	FAMILY SERVICES CENTER	9660	SF	1986
2208	PWD	BUS SHLTR N. DELICIAS	140	SF	1987
2224	MWR	LIGHTED COVERED PATIO	64	SF	1985
2228	AFWTF	STANDBY GENR BY AFCN B#296	416	-	1960
2232	PWD	LIFT STATION	-	-	-
2253	PWD	RECREATION PAVILLION	471	SF	-
2256	NBS	MEDIA CTR ANNEX TO B-296	1092	SF	1986
2262	U.S. CUSTOMS	U.S. CUSTOMS BLDG	6000	SF	-2000
2303	NEX	NAVY LODGE (120 UNITS)	70911	SF	1991
2313	NEX	McDONALD'S RESTAURANT	4500	SF	1985
2317	NEX	PLAYGROUND AREA (NAVY LODGE)	-200	SY	1991
2318	PWD	SUB-STA	-	-	1991
2336	NFCU	NAVY FEDERAL CREDIT UNION	2880	SF	1993
2337	CHAPEL	CHAPEL	11856	SF	1993
2339	NEX	SERVICE STA/MINI-MART	15927	SF	1993
2357	USMC	MARCOR RSVE TRAINING BLDG	19200	SF	1994
2358	USMC	MARCOR RSVE VEH MAINT BLDG	3500	SF	1994

Table 1
Naval Activity Puerto Rico
Sale Parcel I FOST
Facilities List
Page 4 of 4

Facility #	Former User	Name	Area	Unit	Yr Built
2371	MWR	GOLF CART STORAGE	4600	SF	-
2373	USMC	MARCOR RSVE VEH MAINT BLDG	-	-	1994
2374	USMC	MARCOR RSVE VEH MAINT BLDG	-	-	1994
2379	MWR	BASKETBALL/VOLLEY CT B2305	-	-	1994
2382	PWD	SWGE PUMP STATION	450	SF	1995
2385	PWD	NEW GENR BLDG BY B884	143	SF	1994
2407	NAVCONSTA	COMMUNICATION BUILDING	~500	SF	-
2409	U.S. CUSTOMS	ADMIN BUILDING	~2000	SF	~2000
RSL4	WEAPONS	READY ISSUE MAGAZINE	63	SF	1967
RSL5	WEAPONS	READY ISSUE MAGAZINE	63	SF	1967
RSL6	WEAPONS	READY ISSUE MAGAZINE	63	SF	1967

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.

List does not include the 88 Rainbow Hill family housing units constructed in 1975 and renovated 1998-2001, nor the 11 new BEQ buildings constructed in 2004.

- Information not available or unknown

AFWTF Atlantic Fleet Weapons Training Facility
 AIROPS Air Operations
 PWD Public Works Department
 MWR Morale, Welfare and Recreation
 SOCSOUTH Special Operations Command South

**Table 2
Naval Activity Puerto Rico
Sale Parcel I FOST
Solid Waste Management Units Summary and Status**

Parcel	SWMU No.	Description	CERFA*	RCRA Status	Investigation and Remedial Action Summary and Status	Media Affected / Key Contaminants	Site Specific Land Use Controls	Proposed Navy Stopping Point	Navy Stopping Point	Estimated Navy Stopping Time	Remaining Work Required
1	18	Waste Explosives Storage (Bldg. 1666) Less than 90 days accumulation point for waste explosives. Originally a No Further Action site because it was a restricted access area when the naval station was an active facility.	3	CAC without Controls	Inspected during a follow-up VSI conducted in June, 1993. No evidence of releases from this building was observed. Building has not been used since operational closure in March 2004, and was "explosives clean closed" and "explosives certified clean" by the Naval Ordnance Safety and Security Activity in March 2005. November 2007 Phase I RPI recommended the site be designated as Corrective Action Complete without Controls. No surface or subsurface soil contamination has resulted from waste explosives storage, and groundwater is not present to a significant extent beneath the site. EPA approved the recommendation in December 2007.	NA	None	Phase 1 RPI	Completion of RPI	NA	None
1	20	Abandoned Engine Oil Drums (Bldg. 544 Area) Open area where approximately 25 badly rusted, 55-gallon drums of waste oil, or other substances, were observed to be lying (mostly on their sides) on bare soil during the 1984 VSI. The containers were in very poor condition, and partially overgrown with vegetation. A tan-like substance was observed to be leaking onto the ground.	3	CAC without Controls	No Further Action required based on RPI sampling.	NA	None	NFA	NA	NA	None
Basewide	38	Sanitary and Storm Water Sewer Systems Below ground sanitary and storm sewer systems.	3	CAC without Controls	No Further Action determination from 1994 Part 5 Permit carried over to Consent Order. No knowledge or evidence of systematic and routine releases of hazardous wastes. An RPI was not required. The "CAC without 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 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 NAIPR facility, where releases have impacted the sanitary and/or storm water sewer systems.	NA	None	NFA	NA	NA	None
1	43	Former Pistol Range at BEQ A cleared rectangular area that appeared to be unused, with ground scattering consistent with a small arms range was observed on a 1962 aerial photograph. The records review (historic maps) identified this area as a former pistol range. Interviews did not confirm or repudiate use of the area as a pistol range. The ECP physical site inspection could not detect evidence of a former pistol range because the area has been disturbed/covered by the new Bachelor Enlisted Quarters (BEQ).	1	CAC without Controls	Eleven new BEQ housing structures have been constructed at the location of the former pistol range. The recent construction of this area involved earthwork throughout the entire construction site. Due to the amount of soil that had been excavated, samples were collected from the surface soil that remained to determine if lead potentially present in the surface soil could cause a risk to human health receptors living in these quarters. No COPCs were identified. While two of eight surface soil samples had lead concentrations greater than base background, all samples had lead concentrations less than the soil screening criteria.	NA	None	NFA	NA	NA	None

* 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

BEQ	Bachelor Enlisted Quarters	RCRA	Resource Conservation and Recovery Act
CAC	Corrective Action Complete determination	SWCB	Ship Waste Offloading Barge
CERFA	Community Environmental Response Facility Act	SVOC	Semi-Volatile Organic Compound
COPC	Chemical of Potential Concern	TWTF	Tow Way Fuel Farm
ECP	Environmental Condition of Property	VSI	Visual Site Inspection
NA	Not Applicable		
NAIPR	Naval Activity Puerto Rico		
NFA	No Further Action		

Table 3
Naval Activity Puerto Rico
Site Parcel I FOST
OWS, AST, UST List

Number	Type	Location or User	Capacity	Material Stored	Year Installed	Year Removed
2339-1	OWS	SERVICE STATION/MINI MART	-	NA	-	NA
2339-2	OWS	SERVICE STATION/MINI MART	-	NA	-	NA
2341	OWS	NEX	-	NA	-	NA
2373	OWS	PWD	-	NA	1994	NA
2374	OWS	PWD	-	NA	1994	NA
161	AST	PWD	500	Diesel	-	NA
296	AST	PWD	500	Diesel	-	NA
500	AST	PWD	1000	Diesel	-	NA
519	AST	PWD	250	Diesel	-	NA
542	AST	PWD	550	Diesel	-	NA
729	AST	PWD	1000	Diesel	-	NA
731	AST	PWD	1000	Diesel	-	NA
732	AST	PWD	1000	Diesel	-	NA
733	AST	PWD	1000	Diesel	-	NA
734	AST	PWD	1000	Diesel	-	NA
737	AST	PWD	250	Diesel	-	NA
1211A	AST	MWR	1000/1000	Diesel/Mogas	-	NA
1211B	AST	MWR	6000	Diesel	-	NA
1796	AST	NEX	250	Diesel	-	NA
2017	AST	PWD	200	Diesel	-	NA
2228	AST	AFWTF	500	Diesel	-	NA
2303-1	AST	PWD	1000	Diesel	-	NA
2303-2	AST	PWD	500	Diesel	-	NA
2339D	AST	NEX	550	Diesel	-	NA
2357	AST	PWD	500	Diesel	-	NA
2361	AST	PWD	500	Diesel	-	NA
2407	AST	PWD	1000	Diesel	-	NA
1686	UST	Bundy Laundry Building	10000	JP-5/Empty	1996	NA
2339A	UST	NEX Autoport	10000	Mogas/Empty	1994	NA
2339B	UST	NEX Autoport	10000	Mogas/Empty	1994	NA
2339C	UST	NEX Autoport	10000	Mogas/Empty	1994	NA
2339E	UST	NEX Autoport	500	Waste Oil/Empty	1994	NA
298	Former UST	CISTERN FOR B-296	300	Diesel	-	1999
724	Former UST	HIDTA/NSGA/DEFENSE COURIER	5000	Diesel	-	1996
729	Former UST	FINNIGANS OFFICERS CLUB	1000	Diesel	-	1996
730	Former UST	Building 730	10000	Diesel	-	1995
732	Former UST	Building 732	1000	Diesel	-	1996
733	Former UST	Building 733	1000	Diesel	-	1996
760	Former UST	MISC STORAGE BY B-760	280	Unknown	-	1993
1686	Former UST	FBI OFFICE	10000	Diesel	-	1996
1796	Former UST	NEX COMPLEX	280	Diesel	-	1997
1970	Former UST	COMMISSARY & COMM WHSE BLDG	1000	Diesel	-	1997

NA Not Applicable
 - Information not available or unknown

Table 4
Naval Activity Puerto Rico
Sale Parcel I FOST
Asbestos-Containing Material Inspection Results
Page 1 of 3

Facility #	Name	ACM Identified	Comments
86	WATER STGE TANKS TACAN SITE	NI	
88A	MISC STORAGE	NI	
161	GENR BLDG FOR GMOC UHF-VHF	N	
277	PIER FAC	NI	
292	GENERATOR BUILDING	NI	
296	TELEVISION STUDIO	Hazard	20 LF Pipe Insulation
298	CISTERN FOR B-296	NI	
299	WATER PUMP STA NORTH DELICIA	NI	
300	SMALL ARMS/PYROTECH MAGAZINE	NI	
301	MAGAZINE/3HT4/	NI	
302	MAGAZINE/1Y3/	NI	
303	MAGAZINE/124/	NI	
305	FUSE-DETONATOR MAGAZINE	NI	
306	MAGAZINE	NI	
309	FUSE-DETONATOR MAGAZINE	NI	
310	MAGAZINE	NI	
311	HIGH EXPLOSIVE MAGAZINE	NI	
313	HIGH EXPLOSIVES MAGAZINE	NI	
314	HIGH EXPLOSIVES MAGAZINES	NI	
358	PYROTECHNIC MAGAZINE RI	NI	
359	PYROTECHNIC MAGAZINE RI	NI	
360	JET BOOSTER	NI	
384	HIGH EXPLOSIVES MAGAZINE	NI	
500	US ARMY SOUTH	Y	
501	US ARMY SOUTH	Y	
502	SECURITY ADMIN OFFICE	Y	
519	C-3/7TH SFG ADMIN HDQTRS.	N	
529	MWR-ROOS RDS RIDERS	Y	
532	ADMIN AND MAINTENANCE SHOP	NI	
535	WATER STGE TANKS AT BUNDY	NI	
598	NAVSOUTH/NCIS/PHOTOLAB/SECURITY	Hazard	6 LF Pipe Insulation
629	THEATRE	NI	
640	PLAYING COURT - TENNIS	NI	
641	BUNDY BASKETBALL COURTS	NI	
643	PLAYING FIELD AND FAC	NI	
646	GATEHOUSE #3	N	
724	HIDTA/NSGA/DEFENSE COURIER	Y	
725	BOQ TRAN PTY W3-W-5 & O3/ABV	N	
726	BOQ TRAN W3/W5 & O3/ABOVE	N	
727	BOQ TRAN W3/W5 & O3/ABOVE	N	
728	BOQ TRANS W3/W5 & O3/ABOVE	N	
729	FINNIGANS OFFICERS CLUB	N	
730	NEX CENTRAL WHSE	NI	
731	BEQ	NI	
732	UEPH	NI	
733	BEQ	NI	
734	BEQ	NI	

Table 4
Naval Activity Puerto Rico
Sale Parcel I FOST
Asbestos-Containing Material Inspection Results
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Facility #	Name	ACM Identified	Comments
735	SOC SOUTH/ACSS/LIBRARY	NI	
737	NAVCOMMSTA BUILDING	Y	
748	BUS SHLTR SOFTBALL FIELD BUNDY	NI	
760	MISC STGE BY B#760	N	
761	TOILET AT SOFTBALL FIELD	NI	
763	MAGAZINE	NI	
764	MAGAZINE - 7NC5	NI	
765	MAGAZINE - 7NC6	NI	
766	MAGAZINE - 7NC7	NI	
773	BUS SHLTR LNGLEY/BNGTN S.	N	
784	TACAN UNIT/GEN BUILDING	Y	
789	GOLF COURSE	NI	
894	RANGE LIGHT TARGET PAD 2	NI	
1665	READY ISSUE MAG	NI	
1666	READY ISSUE MAG	NI	
1667	READY ISSUE MAG	NI	
1668	READY ISSUE MAG	NI	
1674	GND SUPPORT EQUIPT STORAGE	N	
1686	F. B. I. OFFICE	Hazard	1 LF Pipe and Fitting Insulation
1687	GYMNASIUM/FITNESS CENTER	Y	
1688	BOQ TRANS W1/W2 AND O1/O2	Y	
1703	AM RADIO TRANSMITTER	NI	
1705	SUBSTA BY OLD HOSP B598	NI	
1761	PEDESTRIAN CROSSING BRIDGE	NI	
1762	BUS SHLTR N.W. TEL EXCH	N	
1763	BUS SHLTR S.W. TEL EXCH	N	
1766	TV STUDIO COMM ANTENNA	NI	
1767	ANTENNA POLE SUPPTD/N DELI	NI	
1768	ANTENNA POLE SUPPTD/N DELI	NI	
1769	ANTENNA POLE SUPPTD/N DELI	NI	
1770	ANTNA POLE SUPOTD/NDELI	NI	
1771	ANTNA POLE SUPPTD/N DELI	NI	
1796	NAVY EXCHANGE COMPLEX	N	
1927	BOMB BUILD UP AREA	N	
1962	SEC. STAGE BEHIND B504	Y	
1964	GOLF DRIVING RANGE	NI	
1970	COMMISSARY & COMM WHSE BLDG	Y	
1971	SWGE PUMP HSE BY B#1970	N	
1991	STANDBY GENR BY SEC B#504	N	
1999	SEWAGE PUMP STA AT GOLF CSE	NI	
2006	GENERATOR BUILDING BY GATE 3	N	
2016	GENR CEN ALARM LS 542	Y	
2017	GENER HOUSE BY LS 644/CENT	NI	
2023	BOMB BUILD UP AREA	N	
2045	RADAR TWR/TURNTABLE TACAN	NI	
2048	LIFT STA AT BUNDY TENNIS CTS	NI	
2050	SEPTIC TANK/FIELD BY GATE 3	NI	

Table 4
Naval Activity Puerto Rico
Sale Parcel I FOST
Asbestos-Containing Material Inspection Results
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Facility #	Name	ACM Identified	Comments
2082	KENNEL	Y	
2085	ELEMENTARY SCHOOL GYM	NI	
2143	TRANSFORMER STA BY B#1688	NI	
2145	TRANSFORMER STA BY B#724	NI	
2153	SUB-STA "D" BY LANGLEY DRIVE	NI	
2177	ELECTRICAL EQUIPMENT SHELTER	N	
2202	FAMILY SERVICES CENTER	N	
2206	BUS SHLTR N. DELICIAS	N	
2224	LIGHTED COVERED PATIO	N	
2228	STANDBY GENR BY AFCN B#296	NI	
2232	LIFT STATION	NI	
2253	RECREATION PAVILLION	N	
2256	MEDIA CTR ANNEX TO B-296	Y	
2262	U.S. CUSTOMS BLDG	N	
2303	NAVY LODGE (120 UNITS)	N	
2313	McDONALD'S RESTAURANT	N	
2317	PLAYGROUND AREA (NAVY LODGE)	NI	
2318	SUB-STA	N	
2336	NAVY FEDERAL CREDIT UNION	N	
2337	CHAPEL	N	
2339	SERVICE STA/MINI-MART	N	
2357	MARCOR RSVE TRAINING BLDG	NI	
2358	MARCORRSVE NEH MAINT BLDG	NI	
2371	GOLF CART STORAGE	N	
2373	MARCORRSVE NEH MAINT BLDG OWS	NI	
2374	MARCORRSVE NEH MAINT BLDG OWS	NI	
2379	BASKETBALL/VOLLEY CT B2305	NI	
2382	SWGE PUMP STATION	N	
2385	NEW GENR BLDG BY B884	N	
2407	COMMUNICATION BUILDING	NI	
2409	ADMIN BUILDING	NI	
RSL4	READY ISSUE MAGAZINE	NI	
RSL5	READY ISSUE MAGAZINE	NI	
RSL6	READY ISSUE MAGAZINE	NI	
Mutiple	BEQ (11 UNITS)	NI	
Multiple	RAINBOW HILL FAMILY HOUSING	N	24 of 88 units inspected

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

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

Final Asbestos Inspection Report for Military Family Housing, 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**

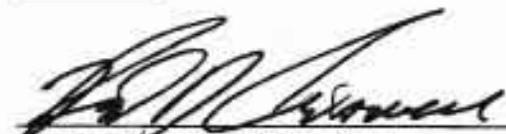
Accordingly, this CERFA Uncontaminated Property Report reflects final site categorizations that may differ from those presented in the Final ECP report.

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

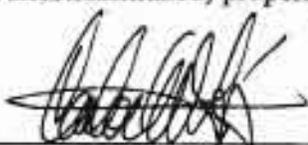


R. DAVID CRISWELL, P. E.
BRAC Environmental Coordinator

8/27/06
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, Sale Parcel I - Bundy, 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 non-family housing buildings covered by this Transfer. I have also received the *Final Lead-Based Paint Inspection/Risk Assessment Report for Military Family Housing, 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 family housing 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

Responses to Comments

(Note: Review comments were received from EPA only.)

Navy Responses to U.S. Environmental Protection Agency (EPA) Comments
Draft Finding of Suitability to Transfer
Sale Parcel I - Bundy

1. Section 2.0 (Description of Property): The term Subject Property needs to be clearly defined. The text in this section needs to be revised to make clear that the Subject Property does not include SWMUs 1, 2, 54, 61, 62 and 71, even though those SWMUs are wholly or partially surrounded by Sale Parcel I. Likewise, the text in this section needs to make clear that the Subject Property does not include the three AOC F areas shown on the parcel Index Map 33- to be included within Parcel 3 (refer to Exhibit C of the FOST). Also, the text should specifically say that all SWMUs and AOCs shown on the Parcel Maps in Exhibit C of the FOST as having "cleanup remaining", are not included in the Subject Property. In addition, please confirm that the area of approximately 1368 acres cited in Section 2.0 accurately reflects the Subject Property boundaries under the Draft FOST, and what is depicted in Exhibit B (see also comment 5.b below).

Navy response:

The following text was added to Section 2 to clarify which SWMUs are not included in the sale parcel –

As shown on the vicinity map in Exhibit B, the Subject Property does not include ten non-contiguous areas wholly or partially surrounded by Sale Parcel I. These areas total approximately 155 acres and are comprised of Area of Concern (AOC) F (four locations) and Solid Waste Management Units (SWMUs) 1, 2, 54, 61, 62 and 71. These areas were carved out of Sale Parcel I because they are Resource Conservation and Recovery Act (RCRA) SWMUs and AOCs with work remaining to be completed under the Administrative Order on Consent (Consent Order) that sets out the Navy's corrective action obligations under RCRA. Furthermore, the SWMUs cannot be included in the transfer of Sale Parcel I because all necessary remedial actions have not been taken prior to transfer as required by Section 120(h)(3)(A)(ii)(I) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Navy and the winning bidder in the public auction of Sale Parcel I will execute a lease in furtherance of conveyance for the carve-out areas. Upon successful completion of all necessary remedial actions by the Navy, the leased property will be transferred to the new owner of Sale Parcel I.

The following text was added to Section 2 to clarify that all SWMUs and AOCs shown on the Parcel Maps in Exhibit C as having "cleanup remaining" are not included in the Subject Property. –

The areas shown on these maps as having "Cleanup Remaining" correlate to AOC F and SWMUs 1, 2, 54, 61 (shown as ECP 7), 62 (shown as ECP 8) and 71 (shown as ECP 17), and are not included in the Subject Property.

The Subject Property area of approximately 1368 acres cited in Section 2.0 has been revised to approximately 1351 acres based on subtracting the applicable

SWMU and AOC acreages (approximately 170 acres) from the total Sale Parcel I acreage of 1521 acres.

2. In Sections 4.0 A. (Hazardous Substance Contamination)

- a. The text should be revised to specifically say that those SWMUs and AOCs shown on the Parcel Maps in Exhibit C as having "cleanup remaining" (i.e., SWMUs 1, 2, 54, 61, 62 and 71, and AOC F), are not included as part of the Subject Property.

Navy response:

The following sentence has been added to this section –

The Subject Property does not include the areas shown on the parcel maps in Exhibit C as having "Cleanup Remaining" (i.e., SWMUs 1, 2, 54, 61/ECP 7, 62/ECP 8 and 71/ECP 17).

- b. The text needs to indicate that although no RFI was required for SWMU 38 (Sanitary and Storm Sewer System) and a Corrective Action Complete determination was made for that SWMU, under the 2007 RCRA Consent Order these determinations are contingent on 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 facility where releases have impacted the sanitary and/or storm water sewer system.

Navy response:

The text now reads as follows –

An RFI was not required at SWMU 38 (Sanitary and Storm Sewer Systems) based on research, interviews and visual inspections. Under the Consent Order, this determination is contingent 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, which are not in the vicinity of the Subject Property, and/or any other SWMU at the NAPR facility where releases may have impacted the sewer systems.

3. In Section 4.0 C (Condition of Property Classification), the text in the last paragraph needs to be modified to indicate the transfer of the CERFA Category 3 areas of the Subject Property (i.e., portions of SWMU 38, the Sanitary and Storm Sewer System) is appropriate at this time, since under the 2007 RCRA Consent Order between the Navy and EPA, the Corrective Action Complete determination for SWMU 38 is contingent on the Navy fully addressing any releases that may have impacted the sanitary and/or storm water sewer system (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 system.

Navy response:

The text has been modified to read as follows –

The portion of SWMU 38 (Sanitary and Storm Sewer System) on the Subject Property is transferable because it was designated Corrective Action Complete Without Controls by EPA in the Administrative Order on Consent (Consent Order) signed on 29 January 2007. This determination is contingent 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, which are not in the vicinity of the Subject Property, and/or any other SWMU at the NAPR facility where releases may have impacted the sewer systems.

4. Exhibit B (Vicinity Map) – the legend on the map needs to be modified to include a color key or symbol which clearly identifies those areas within the boundaries of Sale Parcel I that are not part of the "Subject Property" under the FOST. Also, the figure should be modified to show the approximate locations of SWMUs 26 and 63, which are wholly within the Subject Property, and those portions of SWMU 38 that transect the Subject Property.

Navy response:

The suggested edits to the Vicinity Map have been made. Because the scale of the map is not conducive to display SWMU 38 clearly along with the other SWMUs, a separate map has been inserted that shows the extent of sewer lines in the NAPR sale parcels.

5. Exhibit C (Parcel Maps):
 - a. The legends on the Parcel Index maps should be modified to make clear that all areas labeled as having "cleanup remaining", are not part of the Subject Property under the FOST.

Navy response:

Modification of the Parcel Index maps is not possible. These maps are from a previous report for which the electronic files are not readily available. We have added the following explanatory text to the Exhibit C cover sheet –

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) 1, 2, 54, 61 (shown as ECP 7), 62 (shown as ECP 8) and 71 (shown as ECP 17), and are not included in the Subject Property.

ECP 9 in Parcel 25 is now known as SWMU 63. The boundaries of the ECP, SWMU and AOC areas shown on these maps are approximate and have changed since the draft parcel map report was produced, thus they do not match

the boundaries shown on the vicinity map (Exhibit B), which are also approximate. Furthermore, since the draft parcel map report was published, the northern boundary of Sub-Parcel 27 has been shifted approximately 700 feet to the south.

The survey maps in Exhibit D provide the final boundaries for the Subject Property.

- b. The outline of the parcels shown on certain of the Parcel Index maps in Exhibit C, for example the map of Parcel 25 (labeled "Parcel Index 25-3"), differ substantially from the depiction of the Sale Parcel I boundaries shown on the map given in Exhibit B (Vicinity Map). Please revise the Parcel Index maps in Exhibit C and/or the map in Exhibit B, so that the outlines of the individual sub-parcels shown in Exhibit C accurately reflect what is the Intended Subject Property under this Draft FOST.

Navy response:

See response to Comment 5. a.

6. Please add footnotes to Table 2 (Solid Waste Management Units Summary and Status) of Exhibit E to indicate that:
 - a. CAC means Corrective Action Complete determination; and

Navy response:

The word "determination" has been added to the definition for CAC in the footnotes of Table 2.

- b. The "CAC w/out controls" shown for SWMU 38 (Sanitary and Storm Sewer System) 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 water sewer system (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 system.

Navy response:

This text has been added to the SWMU 38 description under the *Investigation and Remedial Action Summary and Status* column of Table 2.

7. References – January 2007 Administrative Order on Consent should be listed in the reference section.

Navy response:

The Consent Order has been added to the reference section.

FINDING OF SUITABILITY TO TRANSFER

**PARCEL 24
(HEALTH CLINIC)**

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



Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, South Carolina 29405**

November 2007

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO**

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EXHIBITS

- A References
- B Vicinity Map
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- D Survey Map
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**FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO**

1.0 PURPOSE

This Finding of Suitability to Transfer (FOST) documents my determination, as the responsible Department of Defense (DoD) component official, that certain real property and associated improvements known as the Health Clinic Parcel, or Parcel 24, located at Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico, (hereafter Subject Property) 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, 2006b), and Phase III 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 a 2.319-acre parcel of land located in the Downtown area of NAPR, that includes Building 2338 (Former Dental Clinic; 1-story; 13,173 square feet) and an asphalt parking lot. Exhibit B is a vicinity map showing the location of the Subject Property on the former naval station, and Exhibit C is an individual parcel map from the Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico (GMI, 2005). A survey map of Parcel 24 is provided in Exhibit D.

3.0 PAST USE AND PROPOSED REUSE

The Subject Property has been used as a dental clinic since it was built in a previously undeveloped area in 1993. The Naval Station Roosevelt Roads Reuse Plan (CBRE et al, 2004) developed by the Puerto Rico Department of Economic Development and Commerce (DEDC) anticipated the proposed reuse as a Community Based Outpatient Clinic for veterans. In a May 29, 2007 letter to the U.S. Department of Health and Human Services, the Portal del Futuro Authority (PFA), a division of the DEDC acting as the Local Redevelopment Authority, confirmed that the PFA would apply for a public benefit conveyance of the Subject Property for health purposes (PFA, 2007).

FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO

4.0 ENVIRONMENTAL FINDINGS

All available information concerning the past storage, release, or disposal of hazardous substances and/or petroleum products on the former NSRR, 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, and the ECP investigation did not discover any radioactive materials at the clinic, nor any environmental issues associated with medical waste.

There was once a satellite accumulation area associated with Building 2338 where non-regulated waste was stored. The storage area was no longer in use at the time of the ECP inspection. Immediately prior to closure of NSRR, medical waste generated at the dental clinic was transported to the hospital for staging until the next medical waste pickup. The Bio-Hazardous Waste Management Plan governed the handling, storage and disposal of bio-hazardous waste generated by, or delivered to, the hospital. Waste was disposed of in specified red biohazard bags, transported to Building 2434, the Biohazard Waste Storage Building, and placed in designated storage containers until pickup. A manifest was then prepared and signed by the designated Environmental Protection Specialist (EPS). The EPS kept a copy of the manifest for tracking and filing.

B. Petroleum Contamination

There is nothing in the records to indicate there have been releases or instances of disposal of petroleum products or their derivatives on the Subject Property.

FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO

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

These categories are derived from CERCLA, 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). The Final CERFA Report was submitted to the Puerto Rico Environmental Quality Board (EQB) for concurrence. On 11 August 2006, EQB provided the concurrence statement included as Exhibit E to this FOST.

FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO

D. Other Environmental Aspects

1. Ordnance

There is nothing in the records to indicate ordnance handling, storage, or disposal activities have ever been conducted on the Subject Property.

2. Asbestos-Containing Materials

According to the *Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico* (Baker, 2005), eleven suspect homogeneous materials were identified and sampled in Building 2338. None of the materials were found to be asbestos-containing material (ACM). 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.

3. Lead-Based Paint

Lead-based paint (LBP) was banned for consumer use in 1978. Building 2338 was constructed in 1993. Therefore, LBP is not expected to be present.

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 is nothing in the records to indicate PCBs were ever stored or disposed of on the Subject Property.

5. Radon

According to the *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

FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO

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 parcel map in Exhibit C, breeding habitat for the endangered yellow-shouldered blackbird has been identified throughout 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 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.

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO**

B. Hazardous Substance Notice

In accordance with Section 120(h)(3)(A)(i) of the Comprehensive Environmental Response, Compensation, and Liability Act (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 40 CFR 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 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.

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO**

F. Environmental Compliance Agreements / Permits / Orders

On January 29, 2007, the U.S. Department of the Navy and EPA voluntarily entered into an Administrative Order on Consent (Consent Order). The Consent Order set out the Navy's corrective action obligations under the Resource Conservation and Recovery Act (RCRA) and replaced the 1994 RCRA permit as the document memorializing these obligations concerning NAPR. Because there are no RCRA solid waste management units or areas of concern on the Subject Property, there are no RCRA obligations related to the Subject Property at this time. There are no other environmental compliance agreements, permits, or orders associated with the Subject Property.

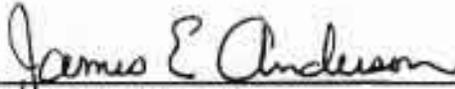
G. Notification to Regulatory Agencies / Public

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 and Draft FOST were provided to those agencies for review. No review comments were received from either agency. 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.

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 reuse.

Nov 8, 2007
Date



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

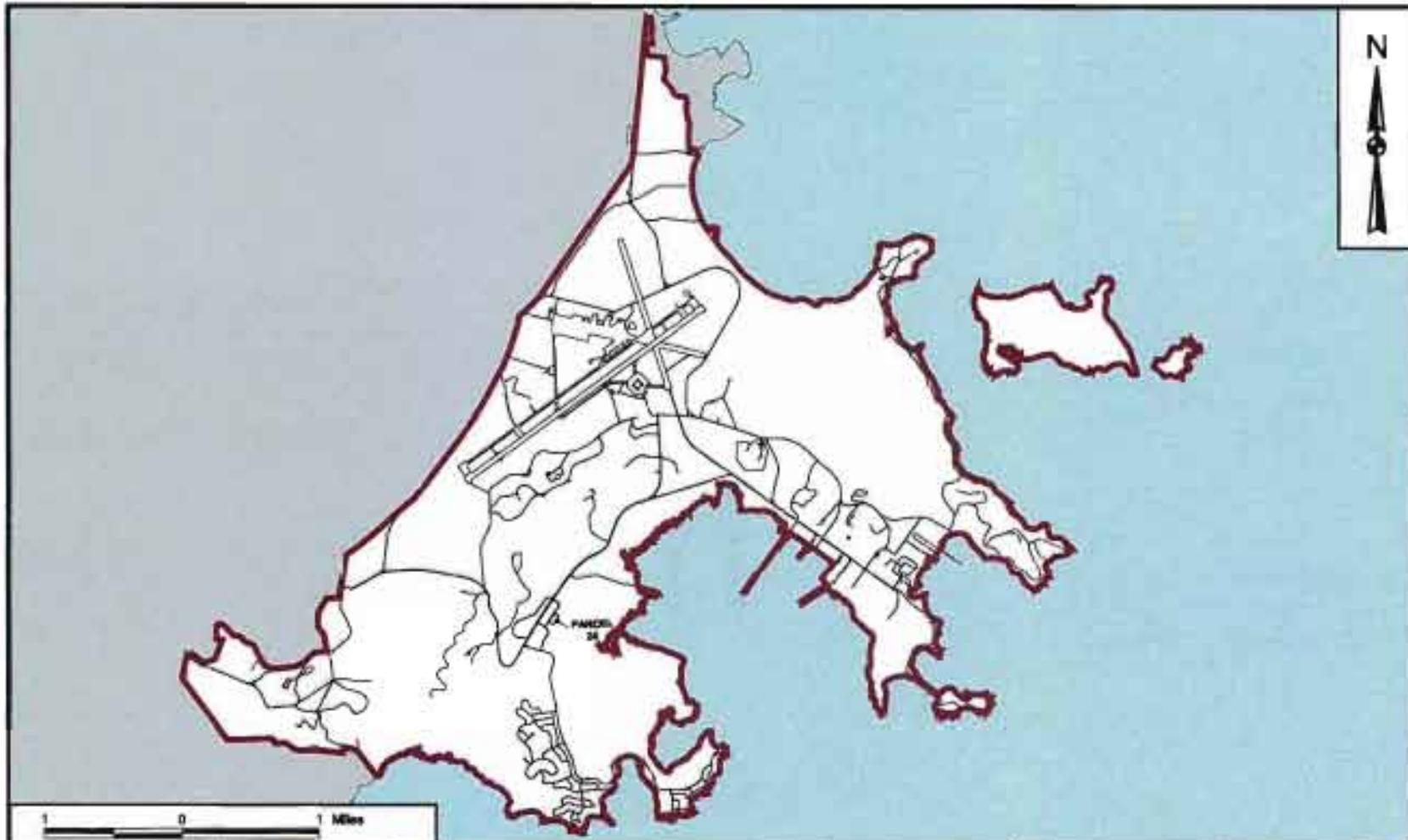
Exhibit A
References

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 24 (HEALTH CLINIC)
NAVAL ACTIVITY PUERTO RICO**

REFERENCES

- Baker, 2005. (Michael Baker Jr., Inc.) *Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.
- CBRE et al, 2004. (CB Richard Ellis Consulting, Cooper Robertson & Partners, Moffatt & Nichol, Puerto Rico Management & Economic Consultants, Inc.) *Naval Station Roosevelt Roads Reuse Plan*. December 2004.
- GMI, 2005. (Geo-Marine, Inc.) *Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico*. Hampton, Virginia. September 2005.
- Navy, 2005. (Naval Facilities Engineering Command Atlantic) *Phase I/II Environmental Condition of Property Report, Former U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico*. Norfolk, Virginia. July 15, 2005.
- Navy, 2006a. (Naval Facilities Engineering Command Atlantic). *Biological Assessment for the Disposal of Naval Station Roosevelt Roads/Naval Activity Puerto Rico Final Report*. Norfolk, Virginia. January 2006.
- 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.
- PFA, 2007. (Portal del Futuro Authority) Letter from Antonio Colorado, Executive Director, to Kathy Beach, Department of Health and Human Services, Program Support Center, Real Property Section, Subject: Application for a Public Health Conveyance, Hato Rey, Puerto Rico. May 29, 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



DRAWN BY	DATE
S. STORIE	ADJST
CHECKED BY	DATE
L. AMERSON	ADJST
COST/CHEDULE/AREA	
SCALE AS NOTED	



PARCEL 24
 (HEALTH CLINIC)
 NAVAL ACTIVITY PUERTO RICO
 CEIBA, PUERTO RICO

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

Exhibit C
Parcel Map

THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 24

Common Name—Health Clinic
Conveyance—PBC
Neighboring Parcel(s)—25

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- 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.
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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 24

Common Name: Health Clinic
Conveyance: PBC
Neighboring Parcel(s): 25

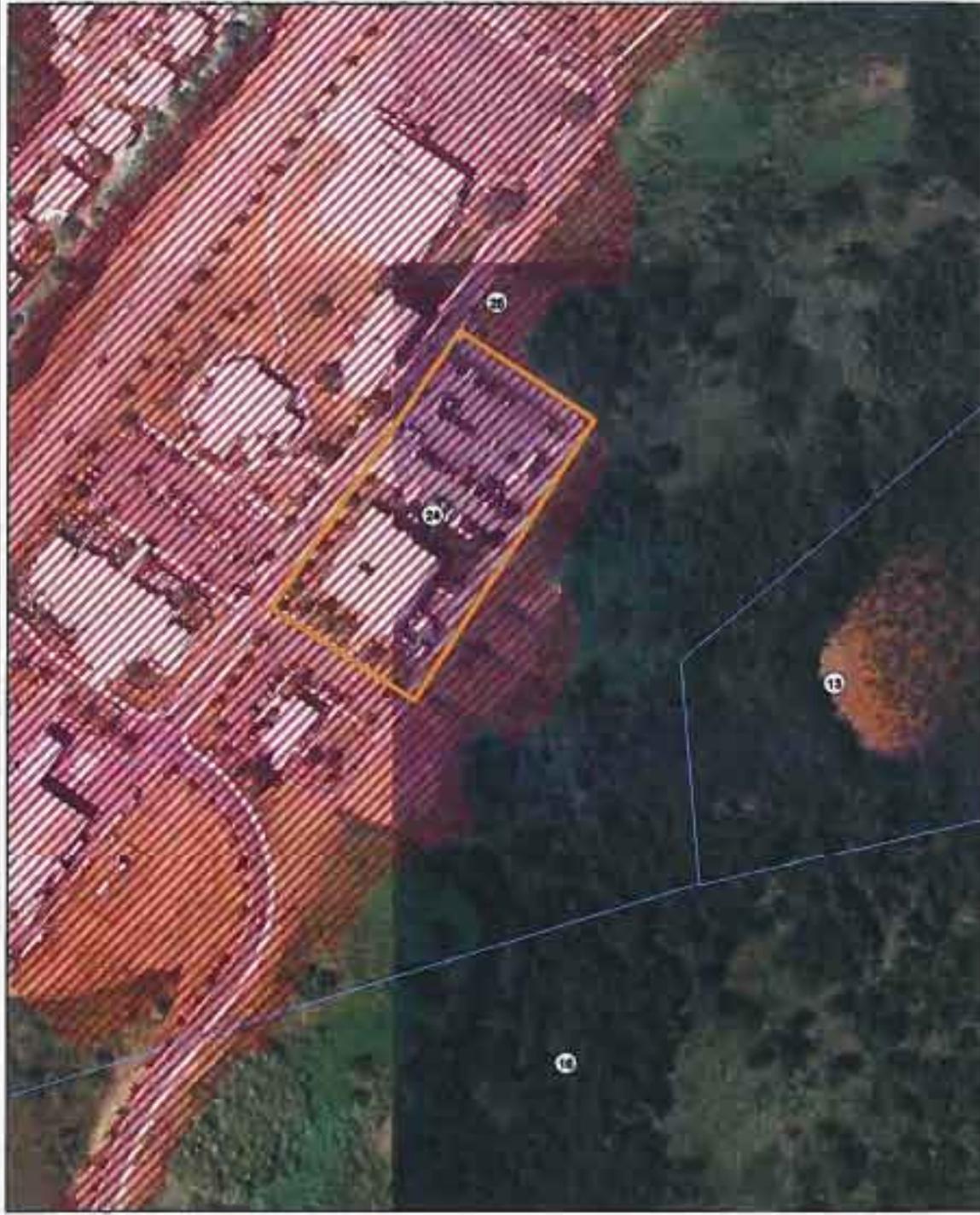
Legend

-  Parcel
-  Neighboring Parcel Boundaries
- Yellow-shaded Area**
-  Neighboring Parcel
-  Breeding Habitat

August 18, 2008



1 inch equals 160 Feet



Parcel Index 24

Common Name: Health Clinic
Conveyance: PBC
Neighboring Parcel(s): 25

Legend

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



August 18, 2008

1 inch equals 100 Feet



Exhibit D
Survey Map

Exhibit E
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

FINDING OF SUITABILITY TO TRANSFER

**PARCEL 18
(SOUTH DELICIAS HILL)**

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



Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, South Carolina 29405**

August 2010

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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A	References
B	Vicinity Map
C	Parcel Map
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E	Tables
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H	Lead-Based Paint Hazard Disclosure and Acknowledgment Form
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**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
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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

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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.

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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.

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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

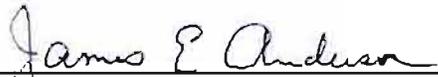
In accordance with DoD guidance, EPA Region 2 and the Puerto Rico EQB have been advised of the proposed transfer of the Subject Property, and copies of the ECP Report, CERFA Report, and Draft FOST were provided to those agencies for review and comment. Navy responses to EPA and EQB review comments on 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.

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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

**FINDING OF SUITABILITY TO TRANSFER
PARCEL 18 (SOUTH DELICIAS HILL)
NAVAL ACTIVITY PUERTO RICO**

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.

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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.

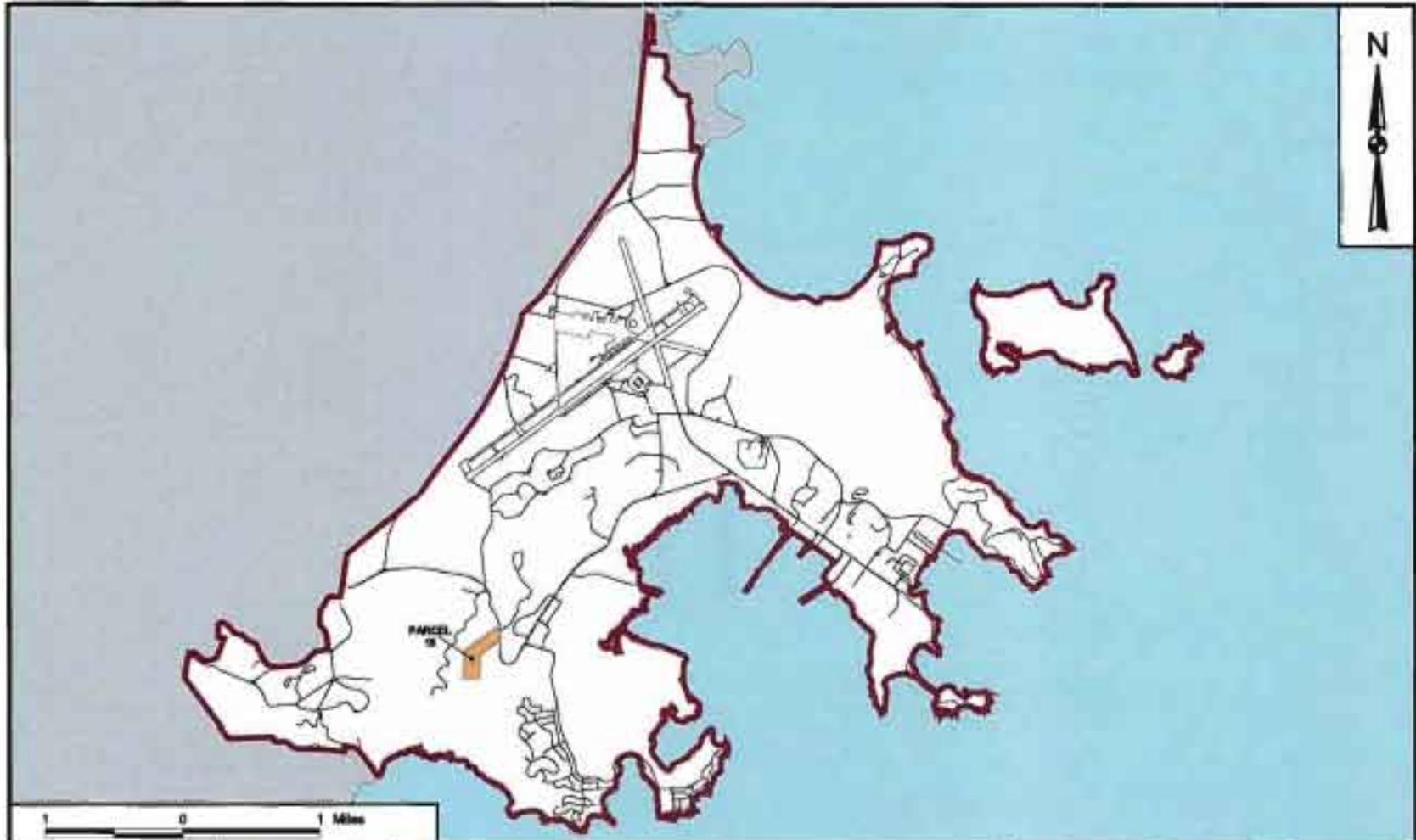
Navy (Naval Facilities Engineering Command Atlantic), 2005. "Phase I/II Environmental Condition of Property Report, Former U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico". Norfolk, Virginia.

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 B. STROZ	DATE 11/18/06	
CHECKED BY L. ANDERSON	DATE 11/18/06	
COST/SCHEDULE/AREA		
SCALE AS NOTED		

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

CONTRACT NUMBER D043	
APPROVED BY —	DATE —
APPROVED BY —	DATE —
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/Forging Pairs
- Roosting Habitat



August 18, 2006

1 inch equals 200 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, 2006



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 10007-1868

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.

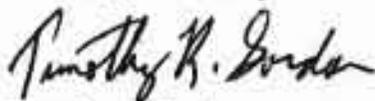
EPA has the following comments on the Draft FOST:

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 address 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

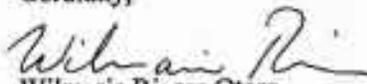
Dear Mr. Criswell:

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.

FINDING OF SUITABILITY TO LEASE

CARVE-OUTS WITHIN SALE PARCEL I - BUNDY

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



Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, South Carolina 29405**

February 2008

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

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FINDING OF SUITABILITY TO LEASE CARVE-OUTS WITHIN SALE PARCEL I - BUNDY NAVAL ACTIVITY PUERTO RICO

1.0 PURPOSE

This Finding of Suitability to Lease (FOSL) 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 Carve-outs Within Sale Parcel I - Bundy (Subject Property) at Naval Activity Puerto Rico (NAPR), Ceiba, Puerto Rico are environmentally suitable for lease subject to the conditions, notifications and restrictions set forth in this document. 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, 2006b) and Phase III 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 lease requirements are stated below.

The Subject Property is comprised of 198.918 acres in ten non-contiguous areas carved out of the 1,509.394-acre Sale Parcel I located in the southwest section of the installation. The carve-out areas were removed from Sale Parcel I because they are Resource Conservation and Recovery Act (RCRA) Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) with work remaining to be completed under the Administrative Order on Consent (Consent Order) that sets out the Navy's corrective action obligations under RCRA. Furthermore, the SWMUs cannot be included in the transfer of Sale Parcel I because all necessary remedial actions have not been taken prior to transfer as required by Section 120(h)(3)(A)(ii)(I) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Navy and the winning bidder in the public auction of Sale Parcel I will execute a lease in furtherance of conveyance for the carve-out areas. Upon successful completion of all necessary remedial actions by the Navy, the leased property will be transferred to the new owner of Sale Parcel I. A vicinity map showing Sale Parcel I and the carve-out (lease) areas is included in Exhibit B.

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

FINDING OF SUITABILITY TO LEASE CARVE-OUTS WITHIN SALE PARCEL I - BUNDY NAVAL ACTIVITY PUERTO RICO

Puerto Rico. NAPR is located on the east coast of Puerto Rico adjacent to the municipality of Ceiba.

The ten carve-outs that comprise the Subject Property are as follows:

- **SWMU 1, Former Army Cremator Disposal Site** – 121.642 acres in Sub-parcel 25 (not including approximately 22 ocean acres). Abandoned, unlined landfill on the edge of mangrove swamps along the shoreline of Ensenada Honda Bay. It was the primary disposal site for NSRR solid waste from the early 1940s to the early 1960s. There are no numbered facilities or buildings on SWMU 1.
- **SWMU 2, Langley Drive Disposal Area** – 27.671 acres in Sub-parcel 25 (not including approximately 8 ocean acres). Abandoned, unlined landfill on the edge of mangrove swamps along the shoreline of Ensenada Honda Bay. Operational from 1939 to 1959. There are no numbered facilities or buildings on SWMU 2.
- **SWMU 54, Former NEX Repair/Maintenance Shop, Building 1914** – 1.743 acres in Sub-parcel 2. Building 1914 is a 648-square foot, concrete-block building constructed in 1978 and used for vehicle maintenance.
- **SWMU 61, Former Bundy Area Maintenance Facilities** – 5.305 acres in Sub-parcel 2. Formerly a large, open storage/maintenance area that is now mostly wooded. It was used for facility and vehicle maintenance activities from the 1940s to 1960s. There are no numbered facilities or buildings on SWMU 61.
- **SWMU 62, Former Bundy Disposal Area** – 14.590 acres in Sub-parcel 2. Formerly a disposal or fill area with multi-toned, mounded materials observed on a 1958-1961 era aerial photograph that is now mostly wooded. There are no numbered facilities or buildings on SWMU 62.
- **SWMU 71, Quarry Disposal Site** – 22.874 acres in Sub-parcel 25. Former quarry operation located at the current location of the Commissary parking lot and the open, grassy field adjacent to the parking lot. Open storage and disposal of drums occurred in this area. The Commissary (Building 2394), a 62,671-square foot building constructed in 1995, is located within the boundaries of this SWMU.
- **AOC F, Sites of Former Underground Storage Tanks (USTs) at Buildings 520, 731, 734 and 735** – 5.093 acres combined in Sub-parcels 2 and 3. After the removal of the former petroleum USTs at these four sites, and the subsequent investigations, the sites were recommended for remedial action by monitored natural attenuation with separate protocols for each site.

The carve-out areas are shown on the sub-parcel maps (Exhibit C) 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 AOC F and SWMUs 1, 2, 54, 61 (shown as ECP 7), 62 (shown as ECP 8) and 71 (shown as ECP 17). The boundaries of the SWMUs and AOCs shown on these maps are approximate and have changed since the draft parcel map report was

FINDING OF SUITABILITY TO LEASE CARVE-OUTS WITHIN SALE PARCEL I - BUNDY NAVAL ACTIVITY PUERTO RICO

produced, thus they do not match the current boundaries shown on the vicinity map (Exhibit B). The survey maps in Exhibit D provide the final boundaries for the Subject Property.

3.0 PAST USE AND PROPOSED REUSE

The former NSRR, including the Subject Property, 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 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 former NSRR with a significant potential for environmental contamination have ceased.

The six carve-out areas that are SWMUs were undeveloped prior to the uses described in Section 2 that resulted in their being designated RCRA SWMUs. The facility associated with SWMU 54 remained active until base closure, the Commissary and a parking lot were constructed on part of the former quarry at SWMU 71, and no activities or construction occurred on the remaining sites after SWMU-related activities ceased. The four carve-out areas that are petroleum UST sites were associated with former Building 520 (Gas Station), Bachelor Enlisted Quarters (Buildings 731 and 734), and a building used by Special Operations Command South, the Antilles Consolidated School System and the base library (Building 735).

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. The Subject Property will be leased in furtherance of conveyance to the highest qualified bidder that purchases Sale Parcel I at public auction. The Lessee will be allowed use of the property subject to the land and groundwater use restrictions described in Section 5.D. of this FOSL. The lease will contain these land use controls as well as requirements for Navy approval of any alterations to the property or uses of the property that result in a change in land use.

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

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 leased and eventually transferred.

A. Hazardous Substance Contamination

The Subject Property includes six RCRA SWMUs with work remaining to be completed (SWMUs 1, 2, 54, 61, 62 and 71). Detailed descriptions of the SWMUs are provided in the ECP Report. Summary descriptions and their current status are provided in Table 1 (Exhibit E).

B. Petroleum Contamination

There were no underground storage tanks (USTs) or oil/water separators on the Subject Property at the time of the ECP inspection in March 2005. The ECP Report and field verification documented four operational aboveground storage tanks (ASTs) on the Subject Property, as listed in Table 2. Visual inspection of these ASTs and the surrounding area during the ECP inspection did not identify any spills, releases or stains.

The ECP Report listed nine known former USTs removed between 1993 and 1999 – USTs 520A-D, 731, 734 and 735 associated with AOC F and USTs 510 and 515 which are part of SWMU 54. Table 2 lists the known former USTs on the Subject Property along with their location, capacity, material stored and year removed. Groundwater contamination potentially associated with USTs 510 and 515 is being addressed as part of the SWMU 54 investigation.

The Navy is conducting a monitored natural attenuation (MNA) study of the eight UST and AST sites that comprise AOC F. These MNA sites include USTs 520A-D where groundwater contamination exceeds cleanup standards for benzene, toluene, ethylbenzene, xylenes and total petroleum hydrocarbons (TPH), and USTs 731, 734 and 735 where soil and/or groundwater contamination exceeds TPH cleanup standards. During the time 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). Given the closure and pending transfer of the former NSRR, the Navy must now

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

document the MNA process to the satisfaction of the U.S. Environmental Protection Agency (EPA) or prepare a work plan in accordance with EPA MNA standards.

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 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 Navy classified the Subject Property as Category 3. Following its review of the CERFA Report, the Puerto Rico Environmental Quality Board (EQB) concurred with this classification and provided a concurrence statement (Exhibit D) in the Final CERFA Report on 11 August 2006. The Category 3 SWMUs may not be transferred until all required remedial actions have been taken to address residual contamination in accordance with the requirements of

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

CERCLA Section 120(h)(3)(A)(ii)(I), and the Category 3 petroleum sites (AOC F) may not be transferred until the work remaining to be completed under the Consent Order is completed.

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 not identified in Buildings 1914 and 2394. 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.

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 lessee could result in FAD ACM hazards. Thus, the lessee 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

Building 1914 was constructed in 1978, the year in which lead-based paint (LBP) was banned for consumer use. Building 2394 was constructed in 1995. While it is not likely that LBP was used at these buildings, it is possible that LBP purchased before 1978 and still in stock could have been used at Building 1914. A Lead-Based Paint Hazards Advisory Statement, Exhibit G to this FOSL, will be provided to the lessee for execution at the time of lease.

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

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 pCi/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 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 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 maps.

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, 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

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

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 LEASE

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

Past activities within the Subject Property included the use and storage of hazardous substances and petroleum products. The ECP Report provides details on hazardous materials use/storage, hazardous waste generation/management, and the nature and extent of hazardous substance and petroleum product releases to the environment. In accordance with Section 120(h)(1) of CERCLA, the lease shall 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 Title 40 of the Code of Federal Regulations (CFR) Part 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. The hazardous substances notice and response action summary for the Subject Property is attached to this FOSL as Exhibit H.

C. Access Clause

The lease for the Subject Property shall contain a clause reserving to the United States, its officers, agents, employees, contractors, and subcontractors the right to enter upon the leased property to complete its RCRA corrective action obligations, including any remedial or corrective action found to be necessary after the date of lease. 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

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

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

D. Land and Groundwater Restrictions

To prevent unacceptable risks to human health and the environment, the Navy will ensure the lease includes the following land use controls on the Subject Property:

- A restriction on land use to non-residential uses only. (SWMUs 1, 2, 54, 61, 62 and 71)
- A restriction on access and/or certain invasive activities in areas where surface soil, subsurface soil and or sediments are contaminated. (AOC F – Buildings 731 and SWMUs 1, 2, 61, 62 and 71)
- A restriction on use of groundwater and installation of new wells in or near areas of known groundwater contamination. (All AOC F sites and SWMUs 1, 2, 54 and 71)
- A requirement to protect the integrity of any existing and all future groundwater monitoring or extraction wells, remedial action equipment and associated utilities. (All AOC F sites and SWMUs 1, 2, 54, 61, 62 and 71)
- A requirement that all ongoing and future environmental investigations and remedial activities at or adjacent to the Subject Property not be disrupted. (All AOC F sites and SWMUs 1, 2, 54, 61, 62 and 71)

E. Environmental Compliance Agreements / Permits / Orders

On January 29, 2007, the Navy and EPA voluntarily entered into a Consent Order that sets out the Navy's corrective action obligations under RCRA and replaces the 1994 RCRA permit as the document memorializing these obligations concerning NAPR. On the Subject Property, AOC F and SWMUs 1, 2, 54, 61, 62 and 71 have investigation and/or cleanup work remaining to be completed under the terms of the Consent Order. Detailed descriptions of AOC F and the SWMUs on the Subject Property are provided in the ECP Report, while summary descriptions and their current status are provided in Table 1 (Exhibit E).

F. Notification to Regulatory Agencies / Public

In accordance with DoD guidance, the U.S. EPA Region 2 and the Puerto Rico EQB have been advised of the proposed lease of the Subject Property, and copies of the ECP Report, CERFA Report, and Draft FOSL were provided to those agencies for review and comment. No comments

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

were received on the draft version of this FOSL. In accordance with CERCLA Section 120(h)(3)(B), Navy has consulted with EPA Region 2 on the FOSL and EPA provided its concurrence in a letter dated February 20, 2008 (Exhibit I). The ECP Report was made available for public review upon finalization. Copies of all lease 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 FOSL and the notices and restrictions discussed herein that will be contained in the lease, the Subject Property is suitable for lease.

2/28/08
Date

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

Exhibit A
References

**FINDING OF SUITABILITY TO LEASE
CARVE-OUTS WITHIN SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

REFERENCES

Baker, 2005a. (Michael Baker Jr., Inc.) *Final Asbestos Inspection Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.

Baker, 2005b. (Michael Baker Jr., Inc.) *Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.

Baker, 2005c. (Michael Baker Jr., Inc.) *Final Lead-Base Paint Inspection/Risk Assessment Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.

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

EPA, 2007. (U.S. Environmental Protection Agency) *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*. January 2007.

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

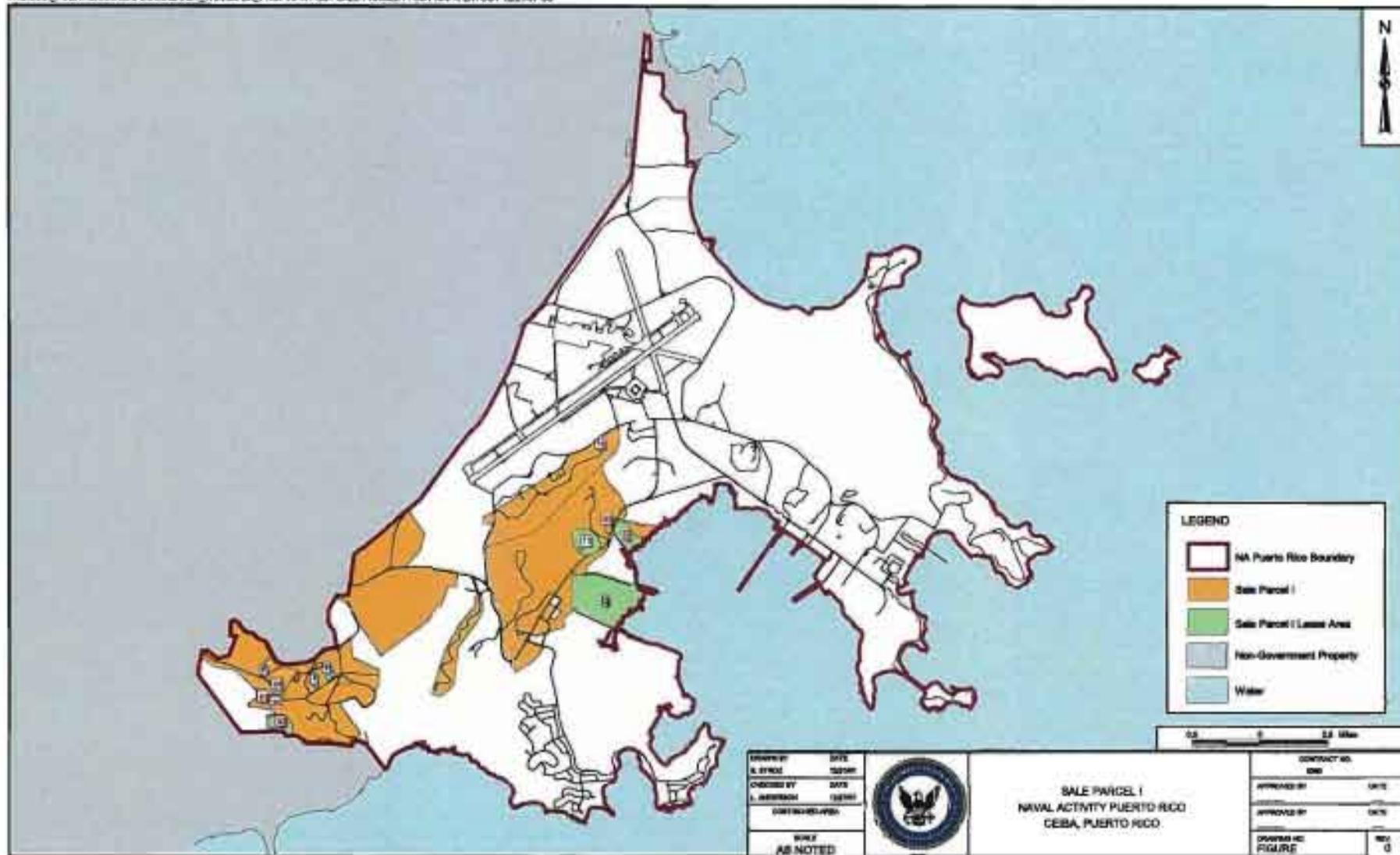
Navy, 2005. (Naval Facilities Engineering Command Atlantic) *Phase I/II Environmental Condition of Property Report, Former U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico*. Norfolk, Virginia. July 15, 2005.

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

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.

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



LEGEND

- NA Puerto Rico Boundary
- Sale Parcel I
- Sale Parcel I Lease Area
- Non-Government Property
- Water



DESIGNED BY S. STINE	DATE 12/20/01
CHECKED BY J. WINTERBORN	DATE 12/20/01
DATE IN CHARGE	
SCALE AS NOTED	



**SALE PARCEL I
NAVAL ACTIVITY PUERTO RICO
CESA, PUERTO RICO.**

CONTRACT NO. 000	
APPROVED BY	DATE
APPROVED BY	DATE
DRAWN BY FIGURE	REV. 0

Exhibit C

Parcel 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) 1, 2, 54, 61 (shown as ECP 7), 62 (shown as ECP 8) and 71 (shown as ECP 17).

ECP 9 in Parcel 25 is now known as SWMU 63. The boundaries of the ECP, SWMU and AOC areas shown on these maps are approximate and have changed since the draft parcel map report was produced, thus they do not match the boundaries shown on the vicinity map (Exhibit B), which are also approximate. The survey maps in Exhibit D provide the final boundaries for the Subject Property.

THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 2

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—1, 3, 4, 5

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 1 and 5 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (1, 5) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- Notify the U.S. Fish and Wildlife Service (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.
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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 2

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 1, 3, 4, 5

Legend

-  Parcel
-  Neighboring Parcel Boundaries
-  Yellow-shouldered Blackbird
-  Nesting/roosting Poles
-  Breeding Habitat



August 18, 2008

1 inch equals 874 Feet



Parcel Index 2

Common Name: *Safe*
Conveyance: *Safe*
Neighboring Parcel(s): 1, 3, 4, 5

Legend

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



August 18, 2008

1 inch equals 874 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 3

**Common Name—Federal
Conveyance—Fed
Neighboring Parcel(s)—2,6**

Yellow-shouldered Blackbird

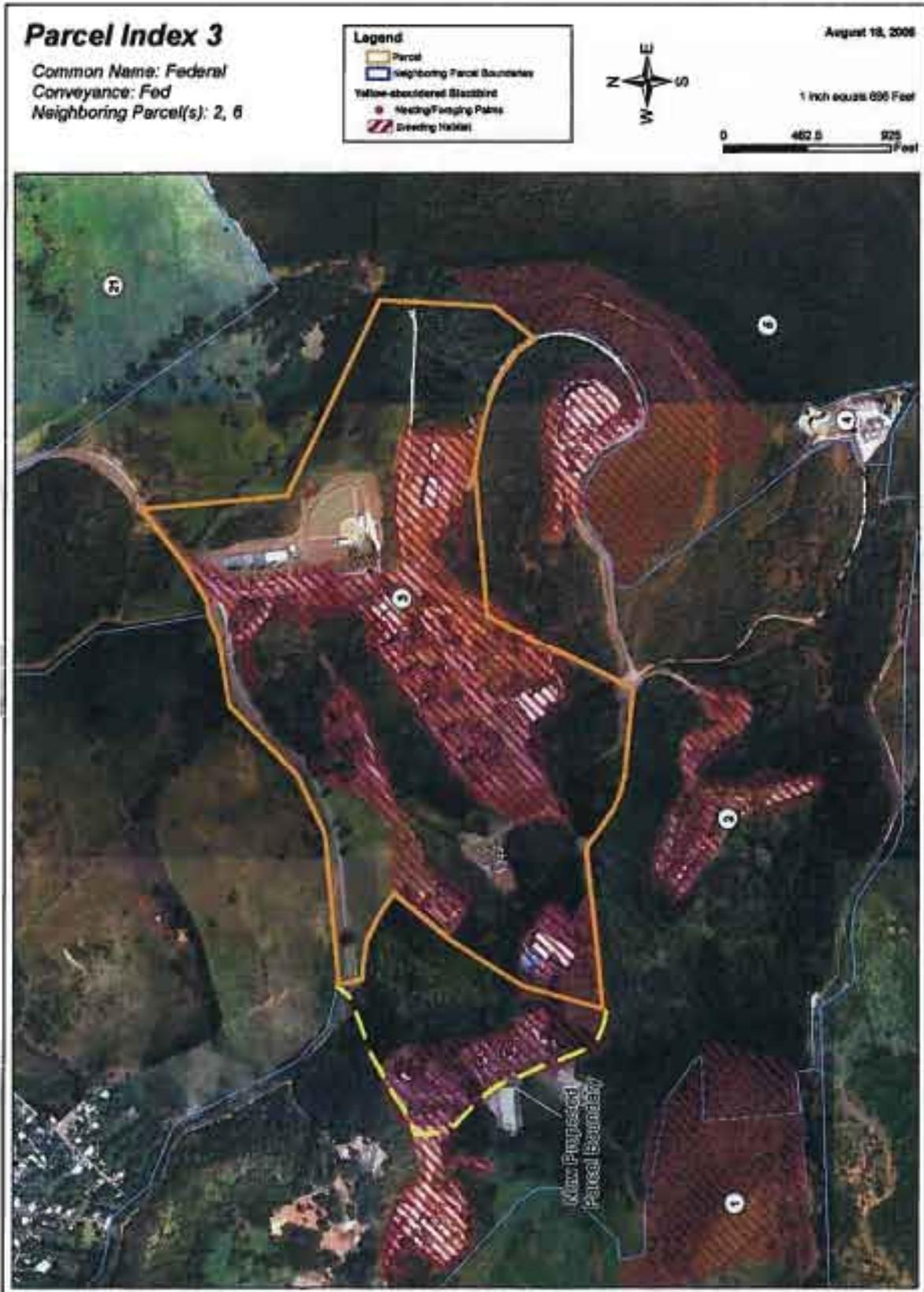
GENERAL REQUIREMENTS

- 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/Remodelling	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 3

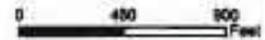
Common Name: Federal
Conveyance: Fed
Neighboring Parcel(s): 2, 5

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



August 18, 2006

1 inch equals 500 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 25

Common Name—Sale

Conveyance—Sale

Neighboring Parcel(s)—5, 13, 6-18, 20, 26-29

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 5, 13, 16, and 28 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (5, 13, 16, 28) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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 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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 25

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 13, 16-18,
20, 26-29

Legend

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

August 18, 2006



1 inch equals 1,070 Feet

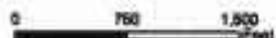


Exhibit D

Survey Maps

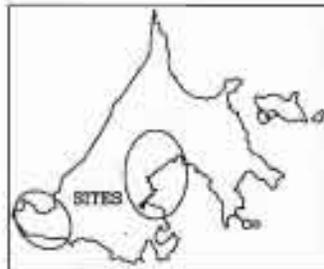
NOTE: While SWMUs 26 and 28 are included in these survey maps, they have not been carved out of Sale Parcel I and are not included in the lease area.

SURVEY NOTES

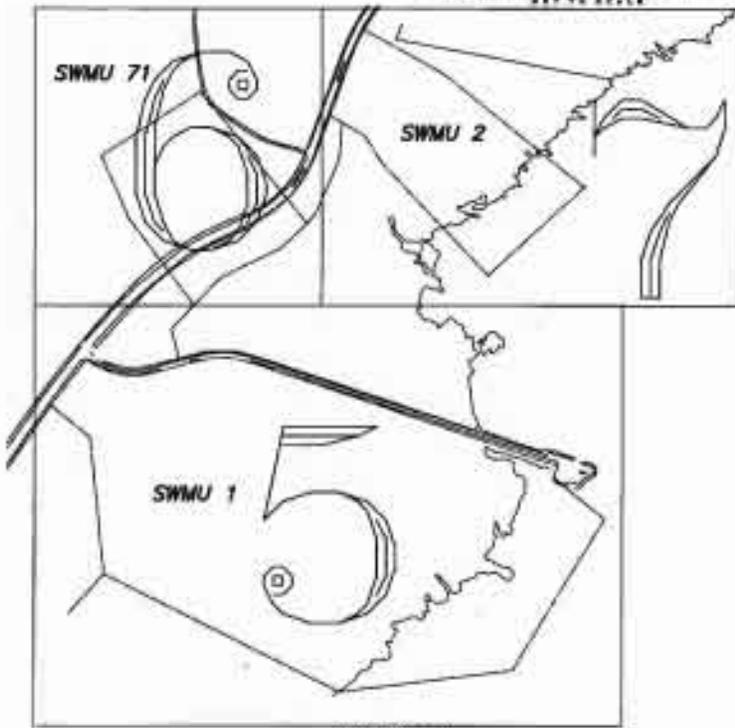
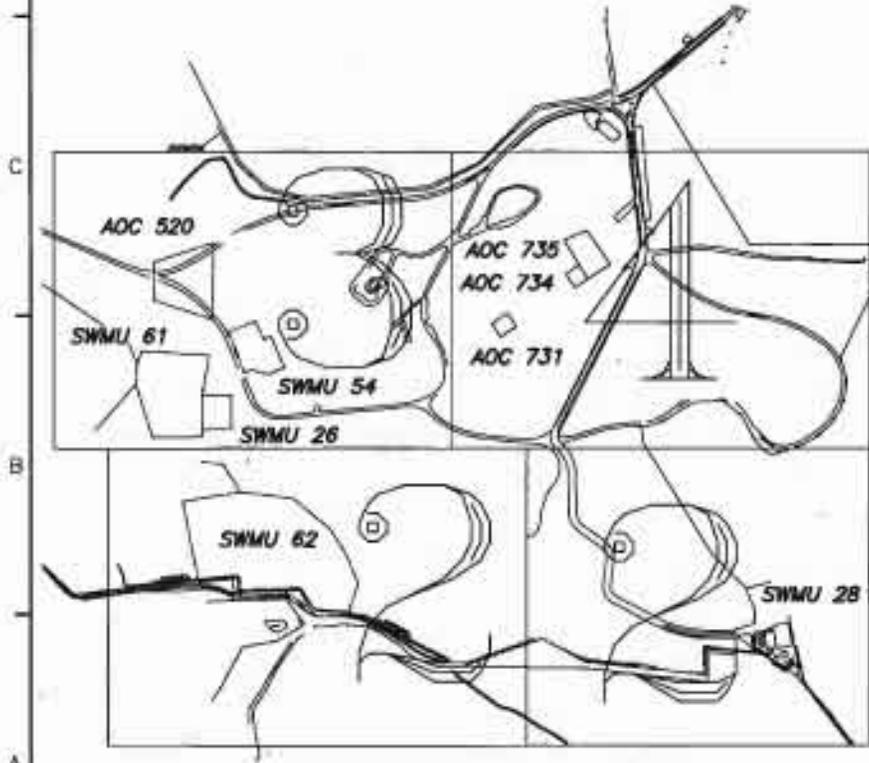
1. SURVEY PARTY PROVIDED BY TRANSPORTATION ENGINEERING FROM FIELD DATA COLLECTED IN 2004 AND 2007. FIELD INSTRUMENTS, CALCULATIONS AND FINAL PLAT HAVE BEEN APPROVED FOR SURVEY BY LIAISON OFFICER, NAVAL ACTIVITY, PUEBLO, RICO.
2. HORIZONTAL COORDINATES SHOWN HEREON ARE IN FEET AND REFER TO THE PUERTO RICO/US/INLAND STATE PLANE COORDINATE SYSTEM AND 83 (1983 REALIZATION). HORIZONTAL COORDINATES WERE DERIVED USING REAL TIME/KINEMATIC GPS RECEIVERS AND ARE REFERENCED TO NATIONAL GEODETIC SURVEY MONUMENTS (NAD 83) (G80007), FURNACE (270 400000), MARSHALL (270 400000) AND AT BOSTON (270 400000).
3. THE FOLLOWING PLATS AND DEEDS WERE USED TO ESTABLISH THE BOUNDARY LINES AS SHOWN ON THIS PLAT:
 - A) PLAT TITLED "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD BOUNDARY REESTABLISHMENT SURVEY" PROVIDED BY TRANSPORTATION ENGINEERING AND LIAISON OFFICER, NAVAL ACTIVITY, PUEBLO, RICO, DATED FEBRUARY 19, 2008.
 - B) PLATMETRIC DATA AND SURVEYS PROVIDED BY MISSOURI STATE ASSOCIATED PROFESSIONALS IN AERIAL SURVEY PERFORMED BY AERIAL-DRUMMER CORPORATION CHARLOTTE, N.C. SURVEY PLUM, FEBRUARY 1988.
4. NOTE: THIS PLAT SHOWS EVIDENCES OF RECORD FOUND IN THE ARMY REGAL SERVICE OFFICE. THIS PLAT MAY NOT SHOW ALL CHANGES OR ENCUMBRANCES THAT COULD AFFECT SUBJECT PROPERTY.



LOCATION MAP
NOT TO SCALE



NAVAL ACTIVITY PUERTO RICO
NOT TO SCALE



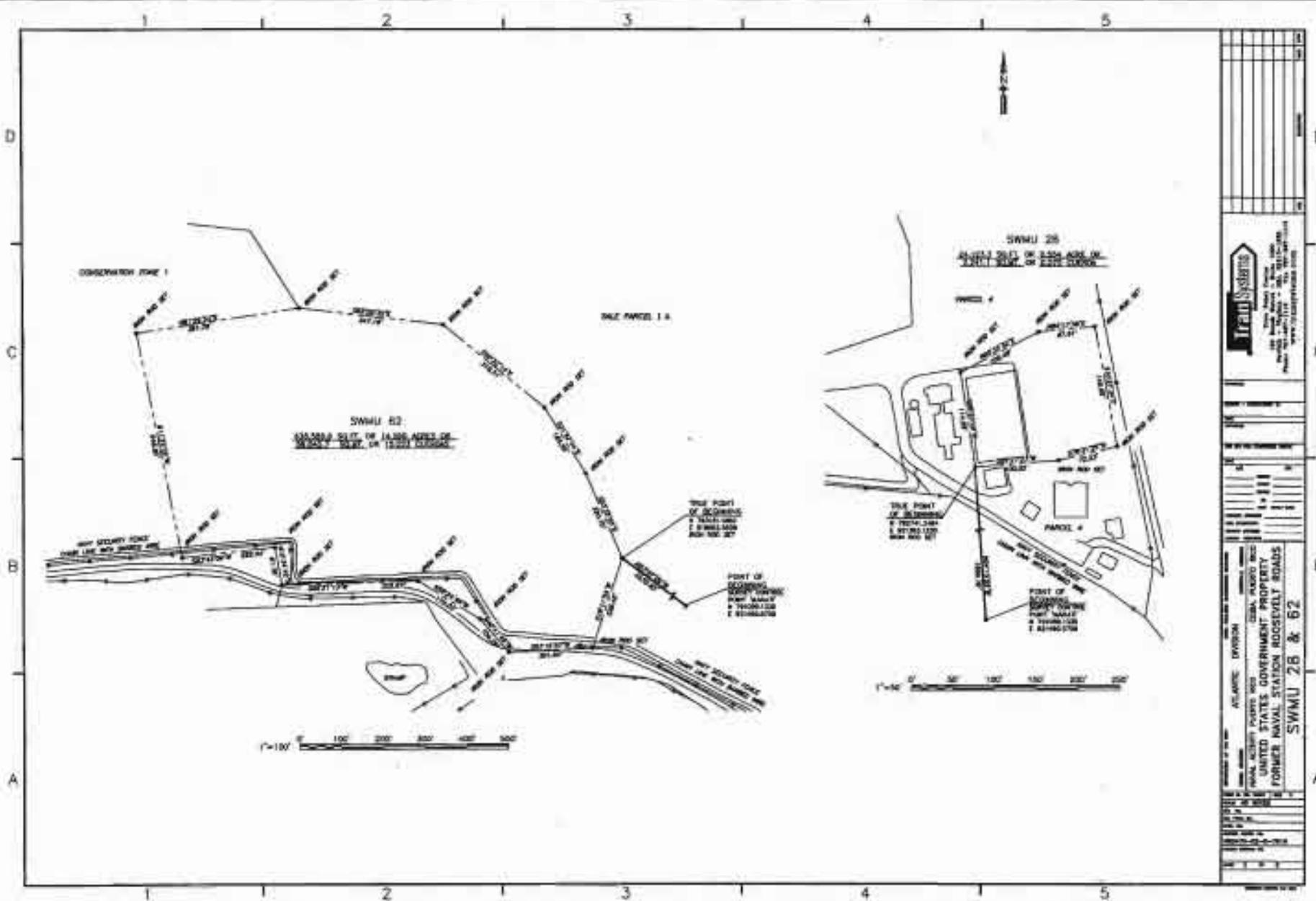
CERTIFICATION

I, LIAISON OFFICER, NAVAL ACTIVITY, PUEBLO, RICO, HEREBY CERTIFY THAT THE INFORMATION THAT FORMER REPRESENTS ACCURATELY SHOWS THE BOUNDARY LINES AND ENCUMBRANCES AS SHOWN HEREON, AND THAT THE SURVEY WAS CONDUCTED IN ACCORDANCE WITH THE SURVEYING ACTS OF PUERTO RICO AND THE UNITED STATES.

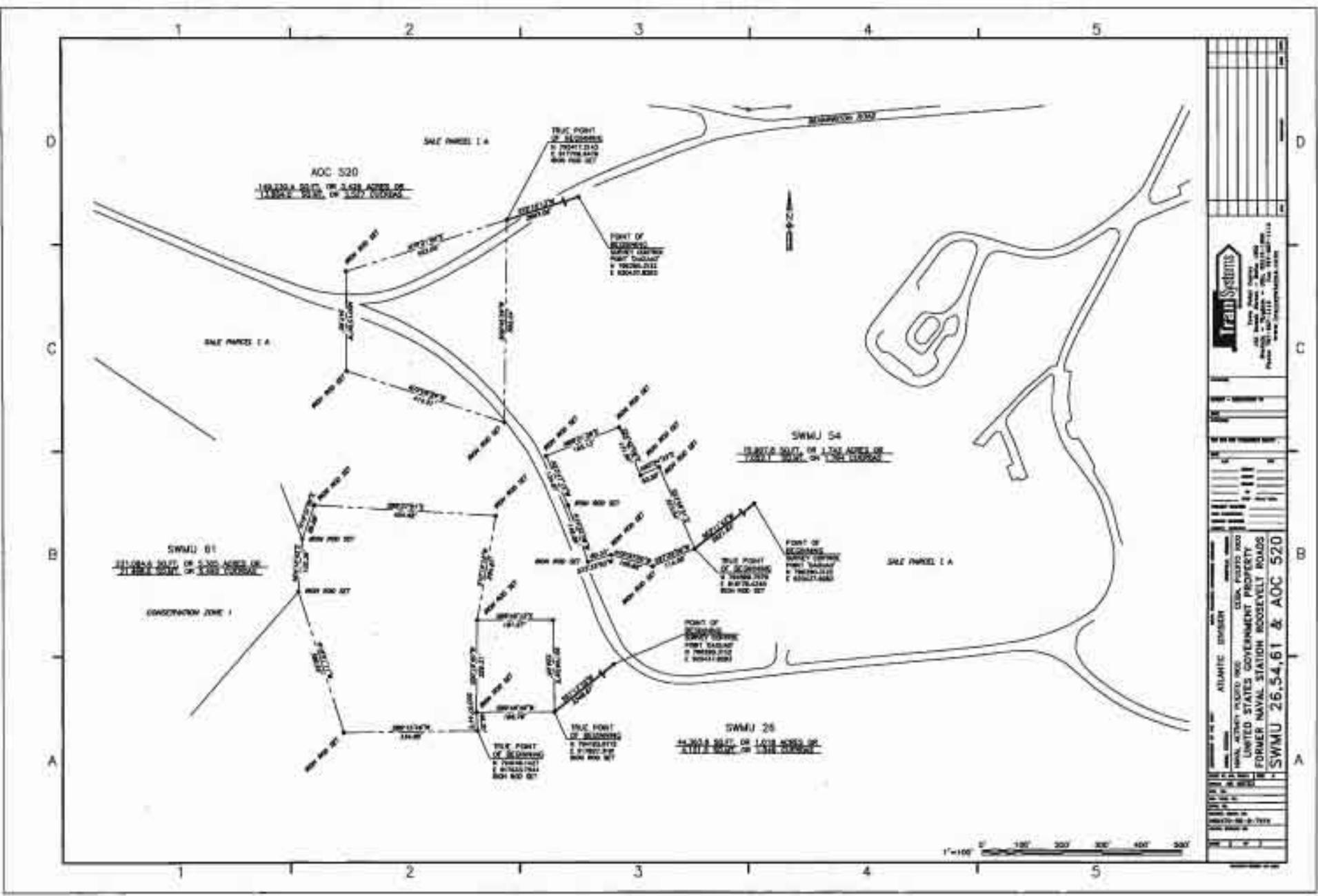
LEGEND
 BOUNDARY LINES: ———
 EASEMENT: - - - - -
 RIGHT OF WAY: ———
 PROPERTY LINE: ———
 FENCE LINE: ———

DATE: _____
 LIAISON OFFICER: _____
 SURVEYOR: _____
 LIAISON OFFICER: _____
 SURVEYOR: _____

TRANSDATA SYSTEMS, INC. 10000 W. CENTRAL EXPRESSWAY, SUITE 100 FORT WORTH, TEXAS 76155 PHONE: 817-441-1111 FAX: 817-441-1112 WWW: WWW.TRANSDATASYS.COM	
PROJECT NO.: _____ SHEET NO.: _____ DATE: _____	ATLANTIC DIVISION NAVAL ACTIVITY PUEBLO RICO UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD SWMU/AOC SITES



10000 10th Street Suite 100 San Diego, CA 92121 Phone: 619-591-1111 Fax: 619-591-1112 www.irasystems.com	
ATLANTIC DIVISION NAVAL RESERVE PORTFOLIO NO. 0384, NAVAL RESERVE NO. 0384 UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD SWMU 28 & 62	
DATE: 10/1/03 DRAWN BY: [blank] CHECKED BY: [blank] APPROVED BY: [blank]	SHEET NO. [blank] TOTAL SHEETS [blank]



ATLANTIC DIVISION 1000 W. 10TH ST. SUITE 100 FORT LAUDERDALE, FL 33304 TEL: 954.771.1111 FAX: 954.771.1112 WWW.TRAUSYSTEMS.COM	
UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD SWMU 26, 54, 61 & AOC 520	
DATE: 11/11/11 DRAWN BY: [Name] CHECKED BY: [Name] APPROVED BY: [Name]	

LEGAL DESCRIPTION FOR SWMU 1

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 1". Thence N58°57'26"E 2403.14' to an iron rod set, the True Point of Beginning, having a northing of 797866.0197 and an easting of 929808.8584:

Thence N05°50'48"W 911.45' to an iron rod set;

Thence N51°42'42"W 333.75' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 385.43', chord bearing of N37°46'56"E

Radius=6625.79'

Arc=385.49'

Thence S54°59'22"E 22.37' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 433.01', chord bearing of S79°52'10"E

Radius=514.61'

Arc=446.92'

Thence N75°15'02"E 302.30' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 366.14', chord bearing of S88°16'44"E

Radius=645.39'

Arc=371.24'

Thence S71°32'28"E 2136.47' to an iron rod set;

Thence S18°40'07"W 81.89' to an iron rod set;

Thence S50°31'13"E 435.77' to a point not set;

Thence S31°14'31"W 1168.18' to a point not set;

Thence S83°03'36"W 1159.31' to a 2" pipe set;

Thence N63°38'46"W 1745.64' to an iron rod set, the True Point of Beginning.

Said parcel containing 5,298,720.4 square feet or 121.642 acres, which equates to 492,269.2 square meters or 125.247 cuerdas.

LEGAL DESCRIPTION FOR SWMU 2

Beginning at a survey control point in the Ward of Quebrada Seca, said point being a brass disk set in concrete. Said point also known as 'DELICIAS' and having a northing of 799143.8537 and an easting of 927504.4901 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 2". Thence N70°46'10"E 4387.62' to an iron rod set, the True Point of Beginning, having a northing of 800588.9980 and an easting of 931647.2922:

Thence N32°10'38"W 212.43' to an iron rod set;

Thence N59°52'22"W 269.49' to an iron rod set;

Thence N19°59'21"E 388.45' to an iron rod set;

Thence following a curve to an iron rod set with a long chord of 220.15', chord bearing of N24°35'36"E

Radius=1371.21'

Arc=220.39'

Thence S61°12'38"E 606.80' to an iron rod set;

Thence S51°34'23"E 917.04' to a 2" pipe set on line at the edge of the mangroves;

Thence S51°34'23"E 277.70' to a point not set;

Thence S47°51'23"W 860.18' to a point not set;

Thence N44°03'52"W 273.78' to a 2" pipe with a northing of 800054.0594 and an easting of 932165.0410 set at the edge of mangroves;

Thence N44°03'52"W 744.46' to an iron rod set the True Point of Beginning.

Said parcel containing 1,205,356.6 square feet or 27.671 acres, which equates to 111,981.7 square meters or 28.491 cuerdas.

LEGAL DESCRIPTION FOR SWMU 54

Beginning at a survey control point in the Ward of Daguao, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 26,54,61 & AOC 520". Thence S53°11'43"W 2821.83' to an iron rod set, the True Point of Beginning, having a northing of 794599.7876 and an easting of 918178.4348:

Thence S67°25'56"W 114.56' to an iron rod set;
Thence N75°03'20"W 108.88' to an iron rod set;
Thence S73°33'50"W 60.33' to an iron rod set;
Thence N19°22'09"W 149.89' to an iron rod set;
Thence N23°47'15"W 134.87' to an iron rod set;
Thence N68°31'38"E 195.13' to an iron rod set;
Thence S24°42'06"E 131.90' to an iron rod set;
Thence N65°24'33"E 50.59' to an iron rod set
Thence S23°48'51"E 223.54' to an iron rod set, the True Point of Beginning.

Said parcel containing 75,907.8 square feet or 1.743 acres, which equates to 7,052.1 square meters or 1.794 cuerdas.

LEGAL DESCRIPTION FOR SWMU 61

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 26,54,61 & AOC 520". Thence S51°13'15"W 3348.67' to an iron rod set. Thence S89°48'48"W 196.76' to an iron rod set. Thence S03°57'44"E 46.30' to an iron rod set, the True Point of Beginning, having a northing of 794146.1427 and an easting of 917633.7544:

Thence S89°15'46"W 334.65' to an iron rod set;
Thence N18°01'11"W 368.92' to an iron rod set;
Thence N04°18'45"E 132.39' to an iron rod set;
Thence N19°37'50"E 89.58' to an iron rod set;
Thence S86°37'21"E 454.62' to an iron rod set;
Thence S10°16'12"W 264.87' to an iron rod set;
Thence S00°16'40"W 229.31' to an iron rod set;
Thence S03°57'44"E 46.30' to an iron rod set, the True Point of Beginning.

Said parcel containing 231,084.6 square feet or 5.305 acres, which equates to 21,468.5 square meters or 5.462 cuerdas.

LEGAL DESCRIPTION FOR SWMU 62

Beginning at a survey control point in the Ward of Daguaon, said point being a brass disk set in concrete. Said point also known as 'MANATI' and having a northing of 791059.1339 and an easting of 921490.5759 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 28 & 62". Thence N53°07'00"W 3535.65' to an iron rod set, the True Point of Beginning, having a northing of 793181.1860 and an easting of 918662.5529:

Thence S18°11'55"W 226.45' to an iron rod set;
Thence S87°15'57"W 201.84' to an iron rod set;
Thence N40°41'45"W 104.29' to an iron rod set;
Thence N58°24'48"W 176.03' to an iron rod set;
Thence S88°21'13"W 325.67' to an iron rod set;
Thence N10°34'42"W 91.78' to an iron rod set;
Thence S83°43'09"W 222.44' to an iron rod set;
Thence N11°22'22"W 548.80' to an iron rod set;
Thence N81°20'53"E 391.79' to an iron rod set;
Thence S83°26'35"E 347.16' to an iron rod set;
Thence S50°33'14"E 315.51' to an iron rod set;
Thence S31°52'44"E 185.55' to an iron rod set;
Thence S23°32'05"E 220.70' to an iron rod set, the True Point of Beginning.

Said parcel containing 635,559.9 square feet or 14.590 acres, which equates to 59,045.7 square meters or 15.023 cuerdas.

LEGAL DESCRIPTION FOR SWMU 71

Beginning at a survey control point in the Ward of Quebrada Seca, said point being a brass disk set in concrete. Said point also known as 'DELICIAS' and having a northing of 799143.8537 and an easting of 927504.4901 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 71". Thence N56°45'58"E 2729.83' to an iron rod set, the True Point of Beginning, having a northing of 800639.9561 and an easting of 929787.8361:

Thence N57°34'40"E 783.74' to an iron rod set;
Thence S39°04'27"E 1114.20' to an iron rod set;
Thence S47°10'22"W 239.01' to an iron rod set;
Thence S63°53'18"W 442.91' to an iron rod set;
Thence S43°59'47"W 245.79' to an iron rod set;
Thence N37°34'41"W 718.38' to an iron rod set;
Thence N23°57'39"W 448.30' to an iron rod set the True Point of Beginning.

Said parcel containing 996,374.7 square feet or 22.874 acres, which equates to 92,566.6 square meters or 23.551 cuerdas.

LEGAL DESCRIPTION FOR AOC 520

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SWMU 26,54,61 & AOC 520". Thence S72°16'13"W 2876.06' to an iron rod set, the True Point of Beginning, having a northing of 795417.2143 and an easting of 917706.9476:

Thence S00°45'29"W 502.34' to an iron rod set;
Thence N72°06'29"W 414.51' to an iron rod set;
Thence N00°15'00"W 247.00' to an iron rod set;
Thence N72°21'06"E 422.05' to an iron rod set, the True Point of Beginning.

Said parcel containing 149,230.4 square feet or 3.426 acres, which equates to 13,864.0 square meters or 3.527 cuerdas.

LEGAL DESCRIPTION FOR AOC 731

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS AOC 731,734 & 735". Thence S30°38'59"W 1551.69' to an iron rod set, the True Point of Beginning, having a northing of 794955.3952 and an easting of 919646.8003:

Thence S34°41'11"E 105.26' to an iron rod set;

Thence S56°28'40"W 125.28' to an iron rod set;

Thence N33°27'35"W 104.79' to an iron rod set;

Thence N56°16'07"E 123.02' to an iron rod set, the True Point of Beginning.

Said parcel containing 13,038.3 square feet or 0.299 of an acre, which equates to 1,211.3 square meters or 0.308 of a cuerda.

LEGAL DESCRIPTION FOR AOC 734

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS AOC 731,734 & 735". Thence S18°34'15"W 835.55' to an iron rod set. Thence S34°49'28"E 271.43' to an iron rod set. Thence S57°01'29"W 172.98' to an iron rod set, the True Point of Beginning, having a northing of 795181.3064 and an easting of 920181.6148:

Thence S56°40'31"W 106.03' to an iron rod set;
Thence N33°26'48"W 108.88' to an iron rod set;
Thence N56°27'13"E 104.85' to an iron rod set;
Thence S34°03'49"E 109.29' to an iron rod set, the True Point of Beginning.

Said parcel containing 11,501.8 square feet or 0.264 of an acre, which equates to 1,068.6 square meters or 0.272 of a cuerda.

LEGAL DESCRIPTION FOR AOC 735

Beginning at a survey control point in the Ward of Dagua, said point being a brass disk set in concrete. Said point also known as 'DAGUAO' and having a northing of 796290.3122 and an easting of 920437.8283 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS AOC 731,734 & 735". Thence S18°34'15"W 835.55' to an iron rod set, the True Point of Beginning, having a northing of 795498.2702 and an easting of 920171.7267:

Thence S34°49'28"E 271.43' to an iron rod set;
Thence S57°01'29"W 172.98' to an iron rod set;
Thence N34°03'49"W 109.29' to an iron rod set;
Thence N31°13'17"W 190.41' to an iron rod set;
Thence N67°01'51"E 162.95' to an iron rod set, the True Point of Beginning.

Said parcel containing 48,070.6 square feet or 1.104 acres, which equates to 4,465.9 square meters or 1.136 cuerdas.

Exhibit E

Tables

**Table 1
Naval Activity Puerto Rico
Sale Parcel I FOSL**

Solid Waste Management Units Summary and Status

Parcel	SWMU No.	Description	CERCLA #	RCRA Status	Investigation and Remedial Action Summary and Status	Media Affected / Key Contaminants	Site Specific Land Use Controls	Current RCRA Phase	Remaining Work Required
1	1	Former Army Cremator Disposal Site. An approximately 36-acre abandoned, unlined landfill on the edges of the mangrove swamps along the shoreline of the Ensenada Honda Bay. The landfill stretches into the mangrove swamps. It was the primary disposal site for the Station's solid waste from the early 1940s to the early 1960s. An estimated 100,000 tons of waste including scrap metal, inert ordnance, batteries, tires, appliances, cans, cables, dry cleaning solvent cans, paint cans, gas cylinders, construction debris, dead animals, and residential waste were disposed of at this unit.	3	CMS	During the Installation Restoration Program (IRP) Round 1 (1986) and Round 2 (1987) investigations, surface water, sediment, and groundwater samples revealed metals (arsenic, chromium, thallium, and selenium), low-level pesticides, and low-level organics in the surface water, sediments, and groundwater at this SWMU. A RCRA Facility Investigation (RFI) of soil, sediments, surface water, and groundwater was required in the RCRA permit. The RFI found that SWMU 1 was minimally impacted by former landfilling operations and recommended implementation of land use restrictions to be developed via the Corrective Measures Study (CMS), and that an ecological risk assessment (ERA) be performed as part of the CMS. The RCRA 7003 Administrative Order on Consent (Consent Order) requires implementation of the CMS. The Draft CMS Final Report is due within 60 days of completion of all work under the CMS Work Plan. Submitted Final Steps 3a/4 of Baseline ERA 1/10/07, and completed Baseline ERA field investigation. Baseline ERA is under development.	GW, Surface and Subsurface Soil, Sediment - dioxins, metals, pesticides, SVOCs, VOCs	1, 2, 4	Baseline ERA (BERA) Steps 7/8	CMS/Statement of Basis (SoB)/CM
1	2	Langley Drive Disposal Area. An approximately 28-acre abandoned, unlined landfill that was operational from 1939 to 1958. It is believed to have been used for the disposal of hazardous and nonhazardous wastes.	3	CMS	During the IRP Round 1 (1986) and 2 (1987) investigations, soil, surface water, and sediment samples revealed metals (lead and selenium) in the soil, surface water, and groundwater at this SWMU. An RFI of soil, surface water and sediments, and groundwater was required by the permit. The RFI found that SWMU 2 was minimally impacted by former landfilling operations and recommended implementation of land use restrictions to be developed via the CMS, and that an ERA be performed as part of the CMS. The Consent Order requires implementation of the CMS. The Draft CMS Final Report is due within 60 days of completion of all work under the CMS Work Plan. Submitted Final Steps 3a/4 of Baseline ERA 1/10/07, and completed Baseline ERA field investigation. Baseline ERA is under development.	GW, Surface and Subsurface Soil, Sediment - metals, pesticides, VOCs, SVOCs	1, 2, 4	BERA Steps 7/8	CMS/SoB/CM
1	54	Former NEX Repair/Maintenance Shop (Bldg. 1914) Built in 1979. Small concrete block building with a center office area and open bays on either side used to perform maintenance on vehicles including oil changes, lubrication, etc.	3	CMS	A site characterization and follow-up RFI identified trichloroethene (TCE) and petroleum constituents in groundwater. CMS has been approved; complete CMS implementation to address TCE in groundwater.	GW - SVOCs, VOCs	1, 4	CMS	CM Work Plan and implementation of CM in accordance with the CMS.
1	81	Former Bundy Area Maintenance Facilities. Used for facility and vehicle maintenance activities from the 1940s to the 1950s. Two areas of disturbed ground, two horizontal storage tanks, drums, and staining in what appears to be a large open storage/maintenance area were observed on a 1958 aerial photograph. A majority of this site is located in a wooded area.	3	CMS	Detections of fuel and chlorinated compounds and exceedance of criteria for selected SVOCs, indicate the soil at this site has been impacted by previous activities consistent with those performed at a maintenance facility. Navy submitted CMS Work Plan to complete Site Characterization and CMS needs to be developed.	Soil - PAHs	1, 2	CMS Work Plan	CMS/SoB/CM
1	82	Former Bundy Disposal Area. A disposal or fill area with multi-toned, mounded materials was observed on a 1958-1961 era aerial photograph. Interviews did not confirm or repudiate the area as a disposal area. Numerous piles of mounded gravel and charcoal, metal and building debris, and two empty 55-gallon drums were observed during development of the ECP. There were no signs of any stressed vegetation observed during the Phase II ECP investigation.	3	RFI	Based on the occurrence of barium in the soil in excess of background and exceedance of criteria, it has been tentatively concluded that site contamination has occurred from previous activities. Barium is associated with ignition equipment and acid batteries, and is a component of gray and ductile iron. These items could have been disposed of at the site as indicated by the post use of the site shown on the 1958 aerial photograph. Navy Final RFI work plan was submitted to the EPA December 20, 2007.	Soil - barium	1, 2	RFI Work Plan	Implement RFI and follow on work.

**Table 1
Naval Activity Puerto Rico
Sale Parcel I FOSL**

Solid Waste Management Units Summary and Status

Parcel	SWMU No.	Description	CERFA #	RCRA Status	Investigation and Remedial Action Summary and Status	Media Affected / Key Contaminants	Site Specific Land Use Controls	Current RCRA Phase	Remaining Work Required
1	71	Quarry Disposal Site. This site is located at the Commissary parking lot where a quarry once operated and in an open grassy field adjacent to the parking lot. Observations from 1976-1983 aerial photographs included numerous drums in open storage on the south side of the former quarry/rock crusher site and at least 25 drums located near the rock crusher, with staining on the ground adjacent to them. The ECP records review identified the area as a former quarry site, but there were no records pertaining to drum storage or disposal. The physical site inspection observed remnants of the quarry area, but saw no signs of disposal, stains, or stressed vegetation. Interviews confirmed both storage and disposal of drums containing a tar-like substance in the area, which were uncovered during construction of the Commissary parking lot. The full extent of the disposal area is unknown.	3	RFI	The ECP Phase II investigation results indicate it is likely that past activities at this site have impacted the environment. PAHs were identified above the residential RBC, but below the industrial RBC in subsurface soil. Groundwater contained naphthalene and vanadium in excess of their Residential RBCs. Phase I RFI work plan required. Navy Final RFI work plan was submitted to the EPA December 20, 2007.	Soil - vanadium, dibenzo(a,h)anthracene, benzo(a)pyrene, vanadium, GW - naphthalene, vanadium	1, 2, 4	RFI Work Plan	Implement RFI and follow on work
1	AOC F (MNA 520)	Site of 4 former USTs (Bldg. 520) One of seven former UST sites and one current AST site that comprise the AOC F MNA sites at NAPR. 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 June 13, 2007. Implement MNA work upon EPA approval of MNA Work Plan. Groundwater sampling will be performed.	GW - Benzene, BTEX, TPH	4	MNA monitoring	Continuation of MNA monitoring program in accordance with MNA Work Plan
1	AOC F (MNA 731)	Site of 1 former UST (Bldg 731) One of seven former UST sites and one current AST site that comprise the AOC F MNA sites at NAPR. 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 June 13, 2007. Implement MNA work upon EPA approval of MNA Work Plan. Subsurface soil sampling deeper than 5 feet below ground surface and groundwater sampling will be performed.	Soil - TPH	2, 4	MNA monitoring	Continuation of MNA monitoring program in accordance with MNA Work Plan
1	AOC F (MNA 734)	Site of 1 former UST (Bldg 734) One of seven former UST sites and one current AST site that comprise the AOC F MNA sites at NAPR. 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 June 13, 2007. Implement MNA work upon EPA approval of MNA Work Plan. Subsurface soil sampling deeper than 5 feet below ground surface and groundwater sampling will be performed.	Soil - TPH, GW-TPH	4	MNA monitoring	Continuation of MNA monitoring program in accordance with MNA Work Plan

**Table 1
Naval Activity Puerto Rico
Sale Parcel I FOSL**

Solid Waste Management Units Summary and Status

Parcel	BWMU No.	Description	CERFA *	RCRA Status	Investigation and Remedial Action Summary and Status	Media Affected / Key Contaminants	Site Specific Land Use Controls	Current RCRA Phase	Remaining Work Required
1	AOC F (MNA 735)	Site of 1 former UST (Bldg 735) One of seven former UST sites and one current AST site that comprise the AOC F MNA sites at NAPR. 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 June 13, 2007. Implement MNA work upon EPA approval of MNA Work Plan. Groundwater sampling will be performed.	GW - TPH	4	MNA monitoring	Continuation of MNA monitoring program in accordance with MNA Work Plan

* 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:

ACM	Asbestos Containing Material	LUC	Land Use Control
AIMD	Aircraft Intermediate Maintenance Department	MCL	Maximum Contaminant Level
AKA	Also Known As	MNA	Monitored Natural Attenuation
ACC	Area of Concern	NA	Not Applicable
AST	Aboveground Storage Tank	NAPR	Naval Activity Puerto Rico
BEQ	Bachelor Enlisted Quarters	NFA	No Further Action
BERA	Baseline Ecological Risk Assessment	NEX	Navy Exchange
BTEX	Benzene, Toluene, Ethylbenzene, Xylenes	NPDES	National Pollutant Discharge Elimination System
CAC	Corrective Action Complete determination	OBOD	Open Burning/Open Detonation
CM	Corrective Measures Implementation	PCB	Polychlorinated Biphenyl
CMS	Corrective Measures Study	POC	Petroleum, Oils and Lubricants
COC	Chemical of Concern	RBC	Risk-Based Concentration
COPC	Chemical of Potential Concern	RCRA	Resource Conservation and Recovery Act
DFM	Diesel Fuel Marine	RFI	RCRA Facility Investigation
DRMO	Defense Reutilization Marketing Office	SoB	Statement of Basis
ECP	Environmental Condition of Property	SWOB	Ship Waste Offloading Barge
EPA	Environmental Protection Agency	SVOC	Semi-Volatile Organic Compound
ERA	Ecological Risk Assessment	BWMU	Solid Waste Management Unit
HHRA	Human Health Risk Assessment	TCE	Tetrachloroethene
IAS	Initial Assessment Study	TPH	Total Petroleum Hydrocarbons
ICM	Interim Corrective Measure	TWFF	Tow Way Fuel Farm
IM	Interim Measure	UST	Underground Storage Tank
IRP	Installation Restoration Program	VOC	Volatile Organic Compound
JP-5	Jet Propulsion Fuel	VSI	Visual Site Inspection
GW	Groundwater	WWTP	Wastewater Treatment Plant
LRA	Local Redevelopment Authority		

Table 2
Naval Activity Puerto Rico
Site Parcel I FOSL
AST and UST List

Number	Type	Location or User	Capacity	Material Stored	Year Installed	Year Removed
731	AST	PWD	1000	Diesel	-	NA
734	AST	PWD	1000	Diesel	-	NA
2394 A	AST	PWD	200	Diesel	-	NA
2394 B	AST	PWD	2000	Diesel	-	NA
510	Former UST	NEX Repair/Maintenance Shop (SWMU 54)	4000	Unknown	-	1993
515	Former UST	NEX Repair/Maintenance Shop (SWMU 54)	550	Waste Oil	-	1996
520A	Former UST	Building 520 (AOC F)	550	Waste Oil	-	1996
520B	Former UST	Building 520 (AOC F)	12000	Mogas	-	1996
520C	Former UST	Building 520 (AOC F)	12000	Mogas	-	1996
520D	Former UST	Building 520 (AOC F)	10000	Diesel	-	1996
731	Former UST	Building 731 (AOC F)	1000	Diesel	-	1996
734	Former UST	Building 734 (AOC F)	1000	Diesel	-	1996
735	Former UST	Building 735 (AOC F)	1000	Diesel	-	1993

AOC Area of Concern
 AST Aboveground Storage Tank
 NA Not Applicable
 NEX Navy Exchange
 PWD Public Works Department
 SWMU Solid Waste Management Unit
 UST Underground Storage Tank
 - Information not available or unknown

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

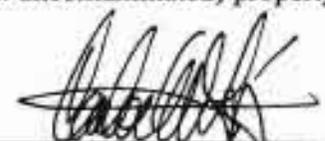


R. DAVID CRISWELL, P. E.
BRAC Environmental Coordinator

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 Lease, Carve-Outs Within Sale Parcel I - Bundy, 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 non-family housing buildings covered by this Transfer. I have also received the *Final Lead-Based Paint Inspection/Risk Assessment Report for Military Family Housing, 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 family housing 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
Carve-Outs Within Sale Parcel I - Bundy
CERCLA Hazardous Substance Notice/Response Action Summary**

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).

Site 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
1914	Former NEX Repair/Maintenance Shop	See SWMU 54	—	—	—	—	—	—	—	—
SWMU 1	Former Army Cremator Disposal Site	VOCs, SVOCs, dioxins, metals, herbicides	—	—	—	Unknown	1940s-1960s	Unknown	1940s-Present	—
SWMU 2	Langley Drive Disposal Area	VOCs, SVOCs, dioxins, metals,	—	—	—	Unknown	1939-1959	Unknown	1939-Present	—
SWMU 54	Former NEX Repair/Maintenance Shop	Trichloroethylene	79016	Trichloroethene Ethene, trichloro	F001, F002, U228	Unknown	1970 - ?	Unknown	Unknown	—
		Benzene	71432	—	U108	Unknown	1970 - ?	Unknown	Unknown	—
		Toluene	108883	Benzene, methyl	F005, U220	Unknown	1970 - ?	Unknown	Unknown	—
SWMU 61	Former Bundy Area Maintenance Facility	POL and hazardous materials	—	—	—	Unknown	1940s - 1960s	Unknown	1940s - 1960s	—
SWMU 62	Former Bundy Disposal Area	Possible hazardous wastes	—	—	—	Unknown	1958-1961	Unknown	1958-Present	—
SWMU 71	Quarry Disposal Site	Possible POLs and hazardous wastes	—	—	—	Unknown	1976-1983	Unknown	1976-1983	—

Exhibit I
EPA FOSL Concurrence Letter



REGION 2
290 BROADWAY
NEW YORK, NY 10007-1886

FEB 20 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeffrey G. Meyers, P.E., CHMM
BRAC Environmental Coordinator
US Navy
BRAC PMO IE
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

Re: Naval Activity Puerto Rico (NAPR), formerly Naval Station Roosevelt Roads,
EPA L. N. Number PRD2170027203,

Draft Finding of Suitability to Lease (FOSL) Carve-Outs within Sale Parcel I -- Bundy

Dear Mr. Meyers:

The United States Environmental Protection Agency (EPA) Region 2 has received the January 2008 Draft Finding of Suitability to Lease (FOSL) Carve-Outs within Sale Parcel I -- Bundy, transmitted to Mr. Timothy Gordon of EPA and to Ms. Josefina A. Gonzalez of the Puerto Rico Environmental Quality Board (PREQB), with your letter of January 14, 2008.

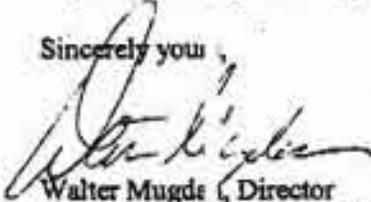
The FOSL covers approximately 170 acres in ten non-contiguous areas to be carved out of the 1,421-acre Sale Parcel I, located in the southwestern portion of the former facility. The carve-out areas were removed from Sale Parcel I because they contain solid waste management units (SWMUs) and Areas of Concern (AOCs) with corrective action work remaining to be completed under the January 2007 RCRA Administrative Order. The SWMUs and AOCs cannot be included in Sale Parcel I because all necessary remedial actions have not been completed prior to transfer as required under Section 120(h)(3)(A)(ii)(I) of CERCLA, nor has the Governor of Puerto Rico approved a Covenant Deferral Request (CDR) for their transfer prior to completing the necessary remedial actions.

The Navy has indicated that upon completion of the public auction of Sale Parcel I, it and the winning bidder of Sale Parcel I will execute a lease in furtherance of conveyance for the carve-out areas. Upon successful completion of all necessary remedial actions by the Navy, they have indicated that the leased property will then to be transferred to the new owner of Sale Parcel I. The necessary remedial actions are to be implemented pursuant to the January 2007 RCRA Administrative Order.

EPA Region 2 has completed its review of the January 2008 Draft Finding of Suitability to Lease (FOSL) Carve Outs within Sale Parcel 1 - Bundy, and has no comments on that Draft FOSL.

If you have any questions, please telephone Mr. Tim Gordon of my staff at (212) 637- 4167.

Sincerely yours,



Walter Mugsda, Director
Division of Environmental Planning and Protection

cc: Ms. Josefina Gonzalez, P.R. Environmental Quality Board.
Mr. David Criswell, US Navy, BRAC PMO
Mr. Felix Lopez, USF&WS

AMENDMENT NO. 1 TO NSRR EDC AGREEMENT

ATTACHMENT 5

**Exhibit F-1 to EDC Agreement
Parcel 1 Conveyance Schedule**

**FINDING OF SUITABILITY TO TRANSFER
(ADDENDUM)**

SALE PARCEL I - Bundy

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



Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, South Carolina 29405**

April 2012

FINDING OF SUITABILITY TO TRANSFER (Addendum)
SALE PARCEL I- BUNDY
NAVAL ACTIVITY PUERTO RICO

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FINDING OF SUITABILITY TO TRANSFER (Addendum)
SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO

1.0 REVISIONS

This document serves as an addendum to the *Finding of Suitability to Transfer, Sale Parcel I – Bundy, Naval Activity Puerto Rico* dated 24 January 2008. This document is being revised based on the recent completion of field activities and review of environmental restoration documentation for Solid Waste Management Unit (SWMU) 1, Former Army Cremator Disposal Site located on the subject property.

The following revisions should be made to the FOST in the sections outlined below

Section 2.0 Description of Property

Add the following paragraph:

Sub-parcel 25 now includes Conservation Zone (CZ) Parcel 69. This parcel was formerly part of the carve-out parcel SWMU 1. The survey map provided in Exhibit D Addendum provides the final boundaries for this sub-parcel.

Section 3.0 Past Use and Proposed Reuse

Add the following paragraph:

The property within CZ Parcel 69 will be transferred via a Public Benefit Conveyance to the Commonwealth of Puerto Rico Department of Natural Resources for reuse as a conservation area.

Section 4.0 Environmental Findings

Add the following paragraph:

A. Hazardous Substance Contamination

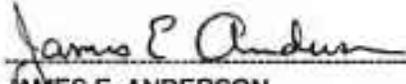
In the RCRA Consent Order, the property within CZ parcel 69 was part of SWMU 1, however subsequent field investigations and reporting have determined the property has not been impacted by the past storage, release, or disposal of hazardous substances and/or petroleum products.

**FINDING OF SUITABILITY TO TRANSFER (Addendum)
SALE PARCEL I - BUNDY
NAVAL ACTIVITY PUERTO RICO**

2.0 SUITABILITY DETERMINATION

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

30 April 2012
Date



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

**FINDING OF SUITABILITY TO TRANSFER (Addendum)
SALE PARCELI - BUNDY
NAVAL ACTIVITY PUERTO RICO**

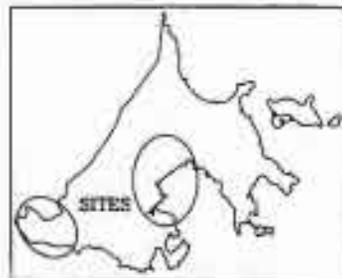
**Exhibit D
(Addendum)
Survey Maps**

SURVEY NOTES:

1. SURVEY DATA PROVIDED BY TRANSMISSION CORPORATION FROM THIS DATE EXISTED IN 2004 AND 2007. FIELD PROCEDURES, CALCULATIONS AND THIS PLAN HAVE BEEN REVIEWED FOR CORRECTNESS BY LINE BOUNDARY SURVEY & ASSOCIATES OF VIRGINIA, INC.
2. HORIZONTAL COORDINATES SHOWN HEREON ARE IN FEET AND REFER TO THE PLACED 800/700M ISLAND STATE PLANE COORDINATE SYSTEM AND BY (1983) ADJUSTMENT. HORIZONTAL COORDINATES FROM 2004M USNG DATA, POSSESSIONS AND ARE REFERENCED TO NATIONAL GEODETIC SURVEY MONUMENTS GRID (NAD 83) DATUM. EASTING (70 ANTERA), NORTING (70 ANTERA) AND UT BAYTON (70 ANTERA).
3. THE FOLLOWING PLATS AND DEEDS WERE USED TO ESTABLISH THE BOUNDARY LINES AS SHOWN ON THIS PLAN:
 - A. PLAT TITLED "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT VIRGIN ISLANDS DEVELOPMENT PROJECT" PROVIDED BY TRANSMISSION CORPORATION AND LINE BOUNDARY SURVEY & ASSOCIATES, DATED FEBRUARY 15, 2007.
 - B. PLAT TITLED "PLAT AND BOUNDARY PROVIDED BY HENNING CARL HENNINGSEN PORTSMOUTH, VA. AERIAL SURVEY PERFORMED BY AERODYNAMICS CORPORATION CHARLOTTE, N.C. SURVEY FROM FEBRUARY 1980.
4. WITH THIS PLAN BEING A SUMMARY OF RECORD FOUND IN THE NAVY REAL ESTATE OFFICE, THIS PLAN MAY NOT SHOW ALL DEEDS OR DOCUMENTS THAT COULD AFFECT SUBJECT PROPERTY.

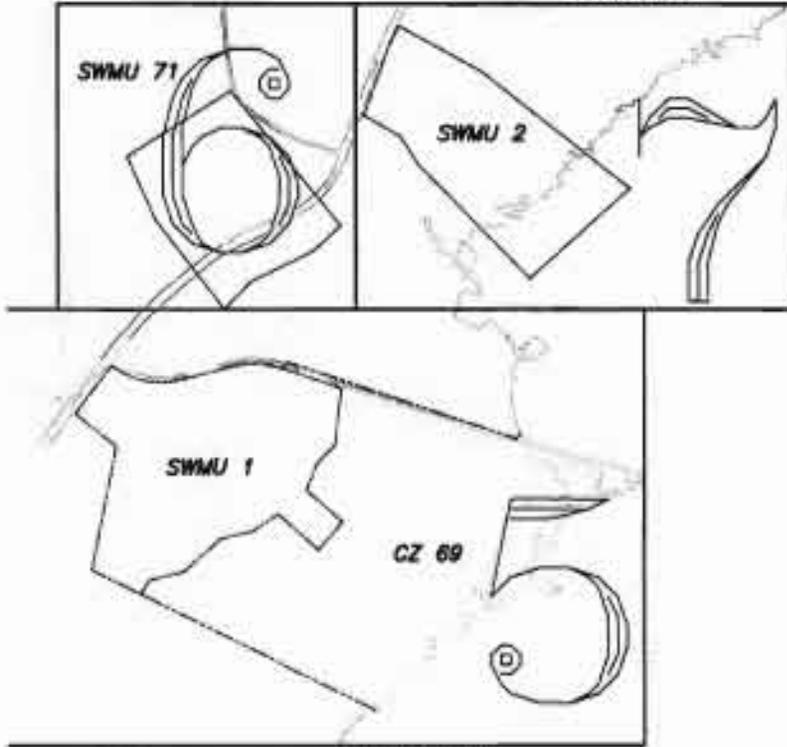
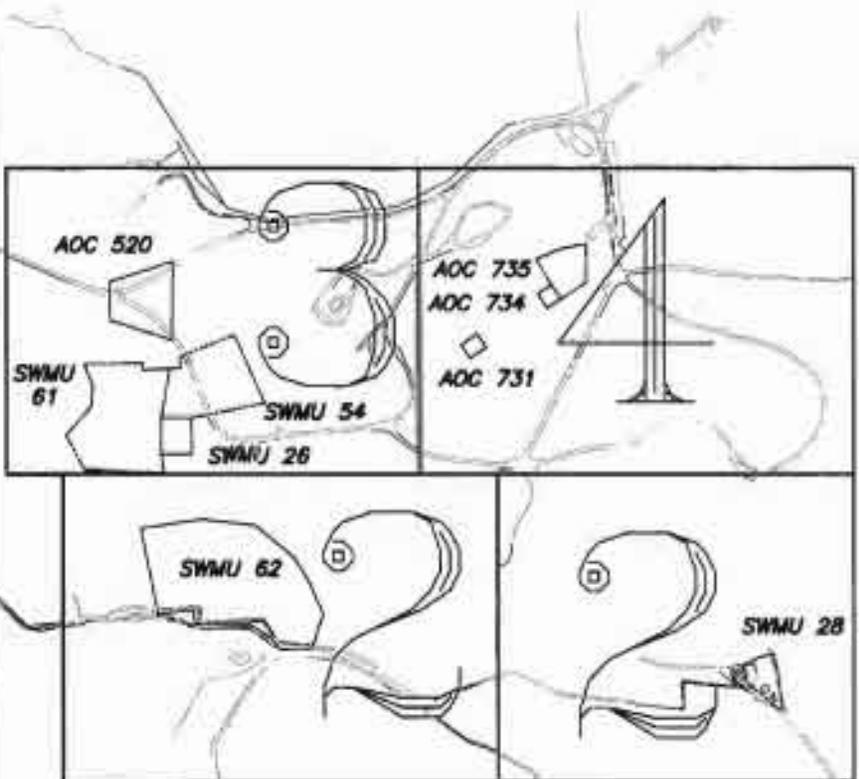


LOCATION MAP
NOT TO SCALE



NAVAL ACTIVITY PUERTO RICO
NOT TO SCALE

D
C
B
A



LEGEND
 CONCRETE MONUMENT FOUND *
 IRON ROD SET *
 PROPERTY LINE - - - - -
 TRAIL LINE _____



CERTIFICATION
 I, LINE BOUNDARY SURVEY & ASSOCIATES, CERTIFY THAT THE INFORMATION THAT FOLLOWS REPRESENTS ACCURATELY WHAT I FOUND, EXCEPT FOR THE CORRECTIONS AND/OR AMENDMENTS THAT HAVE BEEN MADE BY US.

DATE: 11/20/11
 LINE BOUNDARY SURVEY & ASSOCIATES
 11111 W. BAYVIEW BLVD.
 SUITE 100
 FORT LAUDERDALE, FL 33309
 TEL: 954-347-1111
 FAX: 954-347-1112

Trail Systems
 11111 W. BAYVIEW BLVD., SUITE 100, FORT LAUDERDALE, FL 33309
 TEL: 954-347-1111, FAX: 954-347-1112
 WWW.TRAILSYSTEMS.COM

ATLANTIC DIVISION
 NAVAL ACTIVITY PUERTO RICO
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ISLANDS
 SWMU/AOC SITES

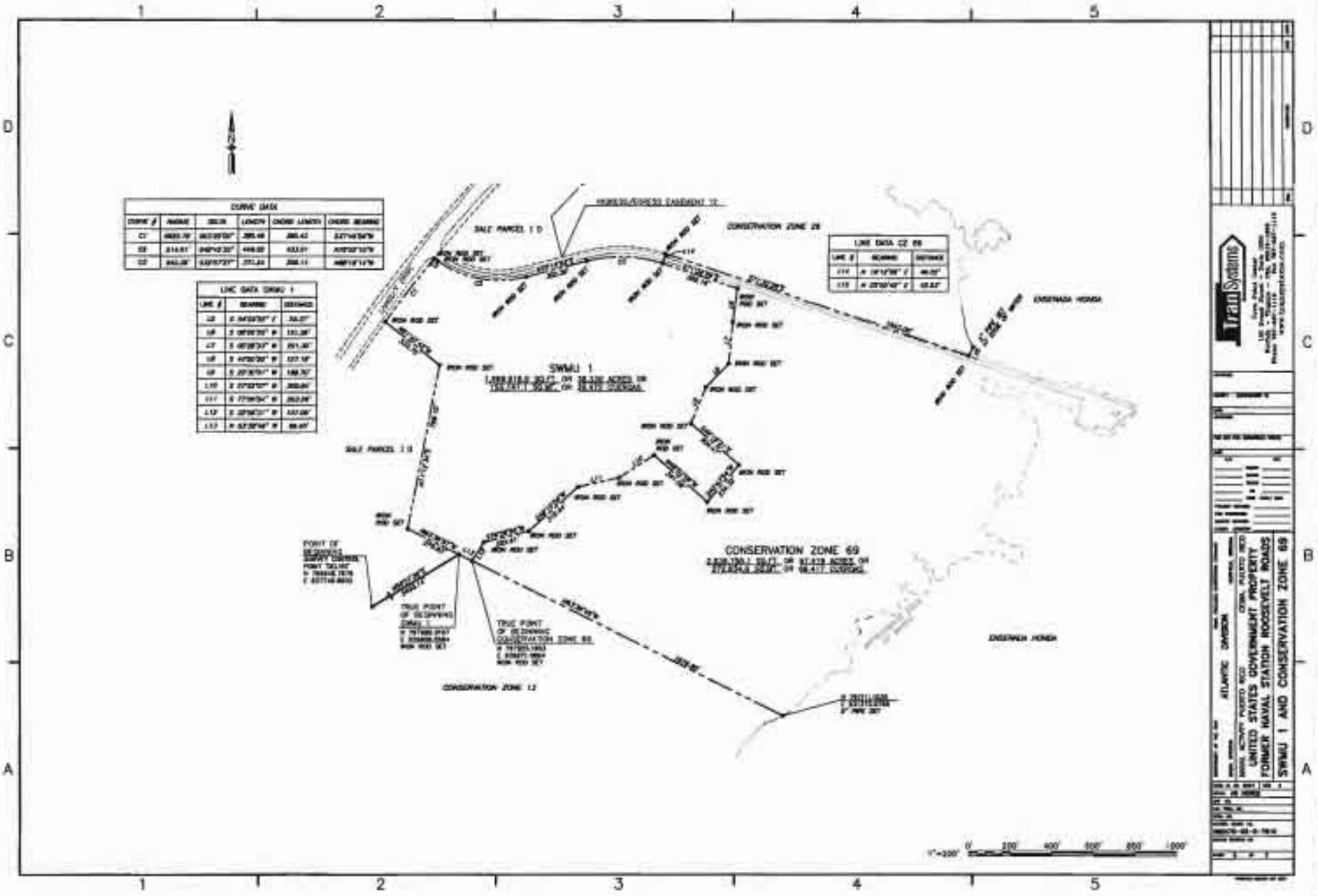
DATE: 11/20/11
 SCALE: AS SHOWN
 SHEET NO. 1 OF 1

D
C
B
A

CURVE DATA				
CURVE #	ANGLE	CHORD	CHORD LENGTH	CHORD BEARING
C1	48.8273°	463.070	285.48	S27°43'57"W
C2	214.81°	2497.237	448.52	S22°22'12"W
C3	84.327°	637.727	275.23	S28°11'17"W

LINE DATA DRAW 1		
LINE #	BEARING	LENGTH
10	S 48°52'57" W	322.07
11	S 27°43'57" W	111.87
12	S 48°52'57" W	201.40
13	S 47°52'57" W	127.17
14	S 27°43'57" W	188.72
15	S 27°43'57" W	200.62
16	S 27°43'57" W	200.62
17	S 27°43'57" W	200.62
18	S 27°43'57" W	200.62
19	S 27°43'57" W	200.62

LINE DATA CE 89		
LINE #	BEARING	LENGTH
111	S 27°43'57" W	46.27
112	S 27°43'57" W	46.27



TranSystems
 11000 17th Avenue, Suite 100
 Boulder, CO 80501
 Phone: 303.440.1172 Fax: 303.440.1144
 www.transystems.com

<p>DATE: 11/11/11 DRAWN BY: [Name] CHECKED BY: [Name] PROJECT: SWMU 1 AND CONSERVATION ZONE 69</p>	<p>SCALE: 1" = 200' NORTH ARROW: [Symbol]</p>
---	--



FINDING OF SUITABILITY TO TRANSFER

SALE PARCEL II - CAPEHART

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



Prepared by:

**Department of the Navy
Base Realignment and Closure
Program Management Office Southeast
4130 Faber Place Drive, Suite 202
North Charleston, South Carolina 29405**

December 2007

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

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H	Lead-Based Paint Hazards Advisory Statement
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**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

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 Sale Parcel II - Capehart (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, 2006b), 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 NAPR to serve as the caretaker of the real property associated with NSRR and to assist in the transfer of the property. NAPR is located on the east coast of Puerto Rico adjacent to the municipality of Ceiba. The Subject Property consists of approximately 495 acres located in the southeast section of the installation, and is primarily comprised of residential neighborhoods. Additional facilities include a high school, community center, medical clinics, storage buildings and various recreational facilities. Exhibits B, C, and D provide a vicinity map, parcel maps from the Draft Report, Parcel Map for the Disposal of Naval Activity Puerto Rico (GMI, 2005), and a boundary survey map, respectively. The Subject Property is comprised of Sub-Parcels 8, 10, 14, 15 and 16, as shown in Exhibit C.

Seven of the eight former NSRR housing communities are located on the Subject Property. The Final Asbestos Inspection Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico (Baker, 2005a) provides the following information for these housing areas:

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

- Algodones – 2, 3, and 4-Bedroom (BR) Apartment Style Units; constructed 1960; renovated 1991
- Caribe Breeze – 2, 3, and 4-BR Duplex Units; constructed 1974; renovated 2001-2003
- Cascajo Point – 2, 3, and 4-BR Single Family Houses; constructed 1960; renovated 1998-2001
- Coast Guard – 3 and 4-BR Single Family Houses; constructed 1960; renovated 1989-1992
- FDR Drive – 3-BR Single Family Houses; constructed 1960; renovated 1999-2000
- Manatee Bay – 2, 3, and 4-BR Single Family Houses; constructed 1960; renovated 2001-2003
- Mangrove Manor – 2, 3, and 4-BR Single Family Houses; constructed 1960; renovated 1989-1992

The housing units are concrete-framed buildings with concrete or ceramic exterior finishes. Interior walls are painted gypsum board and concrete. In addition to the housing units described above, there are approximately 46 other numbered buildings, structures, and facilities on the Subject Property (not including multiple pavilions at Community Beach). Table 1 (Exhibit E) provides their facility number, former user, name or description, area, and year of construction.

3. PAST USE AND PROPOSED REUSE

The Subject Property has been used as a military installation since its acquisition and development by the Navy in the 1940s. The Environmental Condition of Property (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 has used the Subject Property for residential and ancillary purposes only.

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) anticipates future use of the Subject Property as residential with ancillary uses including reuse of the high school and gymnasium. The Subject Property will be sold via public auction to the highest qualified bidder.

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

4. 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, and the ECP investigation did not discover any radioactive materials at the medical clinics, nor any environmental issues associated with medical waste. There was once a satellite hazardous waste accumulation area for lab packs associated with Building 2200 (High School). The storage area was no longer in use at the time of the ECP inspection.

B. Petroleum Contamination

According to the ECP Report, there was one underground storage tank (UST) formerly located on the Subject Property. UST 1513 was a 280-gallon diesel fuel tank associated with Building 1513, a sewage lift station. The UST was removed in August 1996, as shown on Table 2 in Exhibit E. The ECP Report also documented three operational aboveground storage tanks (ASTs) used for storage of diesel fuel for sewage lift station standby generators on the Subject Property. One of these, AST 1972, replaced UST 1513. 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 (CFR) Part 280. The records do not indicate there have been any spills or releases associated with UST 1513 or the ASTs on the Subject Property, nor any other releases or instances of disposal of petroleum products or their derivatives.

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:

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

- **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 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), the 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 Navy classified the Subject Property as Category 1 uncontaminated property. 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

The records do not indicate ordnance handling, storage, or disposal activities have ever been conducted on the Subject Property.

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

2. Asbestos-Containing Materials

An asbestos-containing material (ACM) inspection of military family housing in the eight NAPR residential communities was performed in January and February 2005 in anticipation of property transfer. According to the June 2005 Final Asbestos Inspection Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico (Baker, 2005a), NAPR housing was reportedly constructed between 1960 and 1975. Twenty-seven of the housing units in the Manatee Bay community are of original construction and the remaining 935 NAPR units were renovated to varying degrees beginning in 1989. Renovation of some of the units included removal of ACM.

While ACM was identified in all of the residential communities on the Subject Property, no friable, accessible, and damaged (FAD) ACM hazards were identified in the housing units that were inspected. Not all units in NAPR housing were inspected. Instead, a representative number of units were inspected in each housing community. Detailed information about the units inspected and the materials identified and sampled during the asbestos inspection, including summary tables, location drawings, photographs and laboratory reports is included in the report. The report text (without appendices) is included in Exhibit G of this FOST.

According to the June 2005 Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico (Baker, 2005b), ACM was identified in 6 of the 26 non-housing facilities inspected on the Subject Property, as summarized in Table 3 of Exhibit E. No FAD ACM hazards were identified in any of the facilities. 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. The report text (without appendices) is included in Exhibit G of this FOST.

If renovation of housing units is scheduled following transfer, a more comprehensive ACM inspection should be conducted to attempt to identify hidden ACM (e.g., behind walls, above ceilings, etc.) that would not have been identified during the non-destructive, baseline asbestos study. Furthermore, 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

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

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

A lead-based paint (LBP) inspection and risk assessment of military family housing at NAPR was performed in conjunction with the ACM inspection described above. According to the June 2005 *Final Lead-Based Paint Inspection/Risk Assessment Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico* (Baker, 2005c), NAPR housing was reportedly constructed between 1960 and 1975. Twenty-seven of the housing units in the Manatee Bay community are of original construction and the remaining 935 NAPR units were renovated to varying degrees beginning in 1989. Renovation of some of the units included removal of LBP.

In accordance with U.S. Department of Housing and Urban Development regulations, the Navy is required to inspect and assess NAPR housing for LBP and LBP hazards and disclose the results to the next owner. Because the housing units were constructed in 1960 and later, LBP hazards are not required to be abated before the sale of the properties. LBP hazards were identified in the Algodones, Coast Guard, Manatee Bay, and Mangrove Manor housing communities only, and included deteriorated LBP on various components and slightly elevated lead in dust on floors. Hazards related to friction surfaces, impact surfaces, chewable surfaces, and soil were not identified in these communities. No LBP hazard of any type was identified in the Caribe Breeze, Cascajo Point, or FDR Drive communities. Not all units in NAPR housing were inspected. Instead, a representative number of units were inspected in each housing community. Detailed information about the inspection and risk assessment methodologies, units inspected and the materials identified and sampled during the LBP inspection, including summary tables, location drawings, photographs, laboratory reports, and LBP control options is included in the report. (Baker, 2005c) The report text (without appendices) is included in Exhibit G of this FOST.

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

The NAPR facilities list (Exhibit E, Table 1) indicates the majority of the non-housing buildings, structures and facilities on the Subject Property were constructed prior to 1978, the year in which LBP was banned for consumer use. These facilities, which were not included in the military family housing LBP survey, and any others built before 1978 are presumed to contain LBP.

A Lead-Based Paint Hazards Advisory Statement, Exhibit H to this FOST, will be provided to the transferee for execution at the time of transfer.

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 is nothing in the records to indicate PCBs were ever stored 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.

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

6. Threatened and Endangered Species

As shown on the individual parcel maps in Exhibit C, both sea turtle habitat and breeding habitat and nesting/foraging palms for the endangered yellow-shouldered blackbird have been identified on the Subject Property. The Commonwealth of Puerto Rico has committed to zone 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 (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, 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 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

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

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 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 Resource Conservation and Recovery Act (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. Although there are no RCRA solid waste management units or

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

areas of concern on the Subject Property, 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. There are no other environmental compliance agreements, permits, or orders associated with the Subject Property.

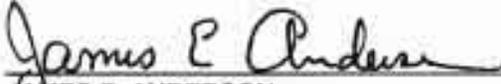
G. Notification to Regulatory Agencies / Public

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 and Draft FOST were provided to those agencies for review and comment. Two comments were received from EPA. Those comments and Navy responses 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.

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 reuse.

1/3/08
Date



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

Exhibit A
References

**FINDING OF SUITABILITY TO TRANSFER
SALE PARCEL II - CAPEHART
NAVAL ACTIVITY PUERTO RICO**

REFERENCES

Baker, 2005a. (Michael Baker Jr., Inc.) *Final Asbestos Inspection Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.

Baker, 2005b. (Michael Baker Jr., Inc.) *Final Asbestos Inspection Report for Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.

Baker, 2005c. (Michael Baker Jr., Inc.) *Final Lead-Base Paint Inspection/Risk Assessment Report for Military Family Housing, Naval Activity Puerto Rico, Ceiba, Puerto Rico*. Moon Township, Pennsylvania. June 2005.

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

EPA, 2007. (U.S. Environmental Protection Agency) *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*. January 2007.

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

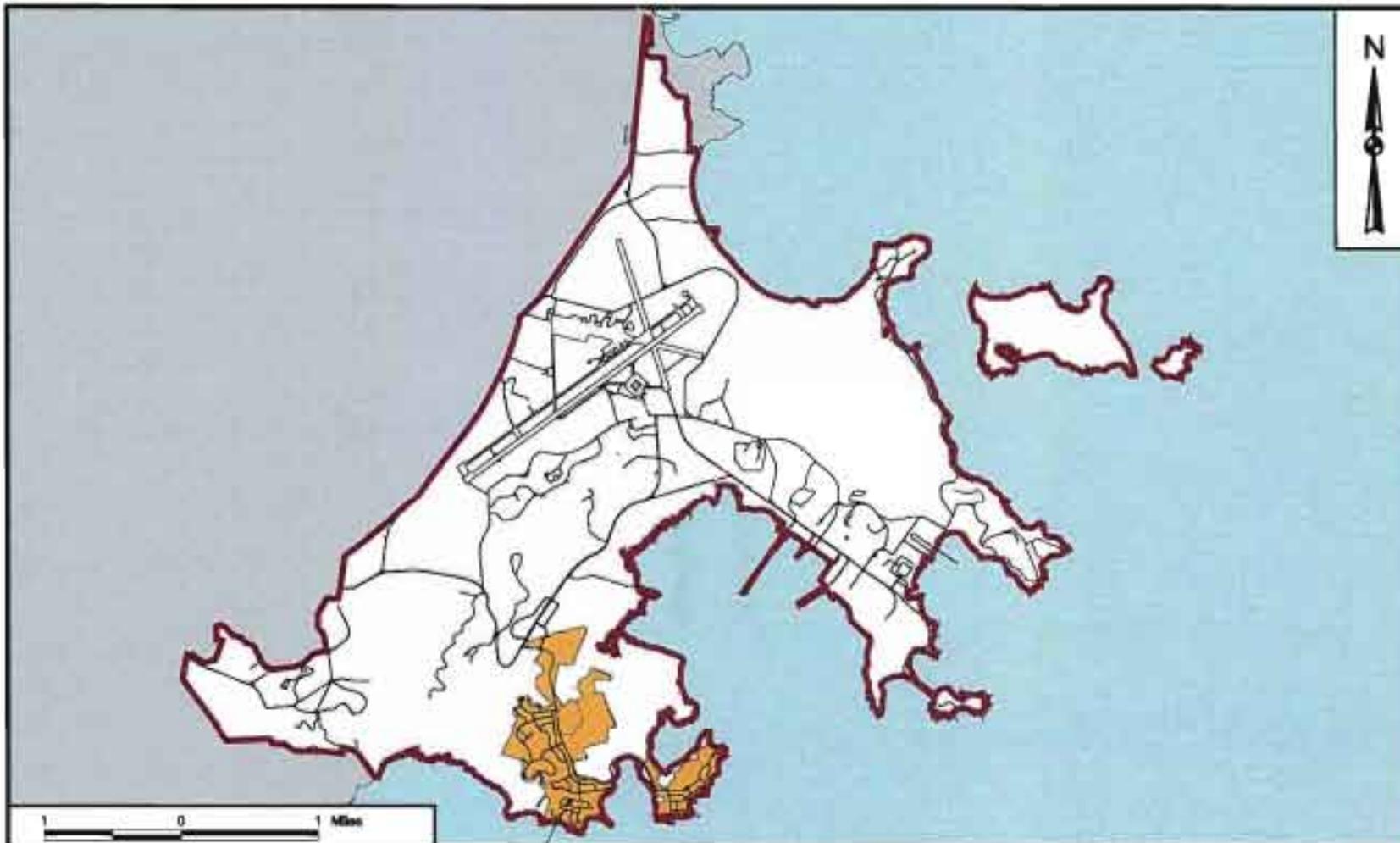
Navy, 2005. (Naval Facilities Engineering Command Atlantic) *Phase I/II Environmental Condition of Property Report, Former U.S. Naval Station Roosevelt Roads, Ceiba, Puerto Rico*. Norfolk, Virginia. July 15, 2005.

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

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.

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



DRAWN BY	DATE
S. STROZ	1996MT
CHECKED BY	DATE
L. ANDERSON	1996MT
COSTRICH BÉNAL-ARSA	
SCALE AS NOTED	



SALE PARCEL II
 NAVAL ACTIVITY PUERTO RICO
 CEIBA, PUERTO RICO

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

Exhibit C
Parcel Maps

THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 8

Common Name—Sale

Conveyance—Sale

Neighboring Parcel(s)—5, 6, 7, 9, 13-16

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 5, 7, 9, and 13 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (5, 7, 9, and 13) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the conservation parcel boundary from March 15-August 30 (breeding season).
- Notify U.S. Fish and Wildlife Service (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/Remodelling	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., light cars, 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 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) and 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 a sea turtle nesting beach.

Cobana Negra

GENERAL REQUIREMENTS

- Consult with USFWS regarding any recreational development plans (e.g., hiking trails) in Parcel 5.

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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Parcel Index 8

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 6, 7, 9,
13-16

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



August 18, 2008

1 inch equals 575 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 10

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—11, 12, 13

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 11, 12 and 13 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (11, 12, and 13) between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the conservation parcel boundary from March 15-August 30 (breeding season).
- 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 the 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 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).
General Operations	Before moving check moveable outdoor equipment (e.g., carts, vehicles) for yellow-shouldered blackbird nests from 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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Parcel Index 10

Common Name: *Sale*
Conveyance: *Sale*
Neighboring Parcel(s): 11, 12, 13

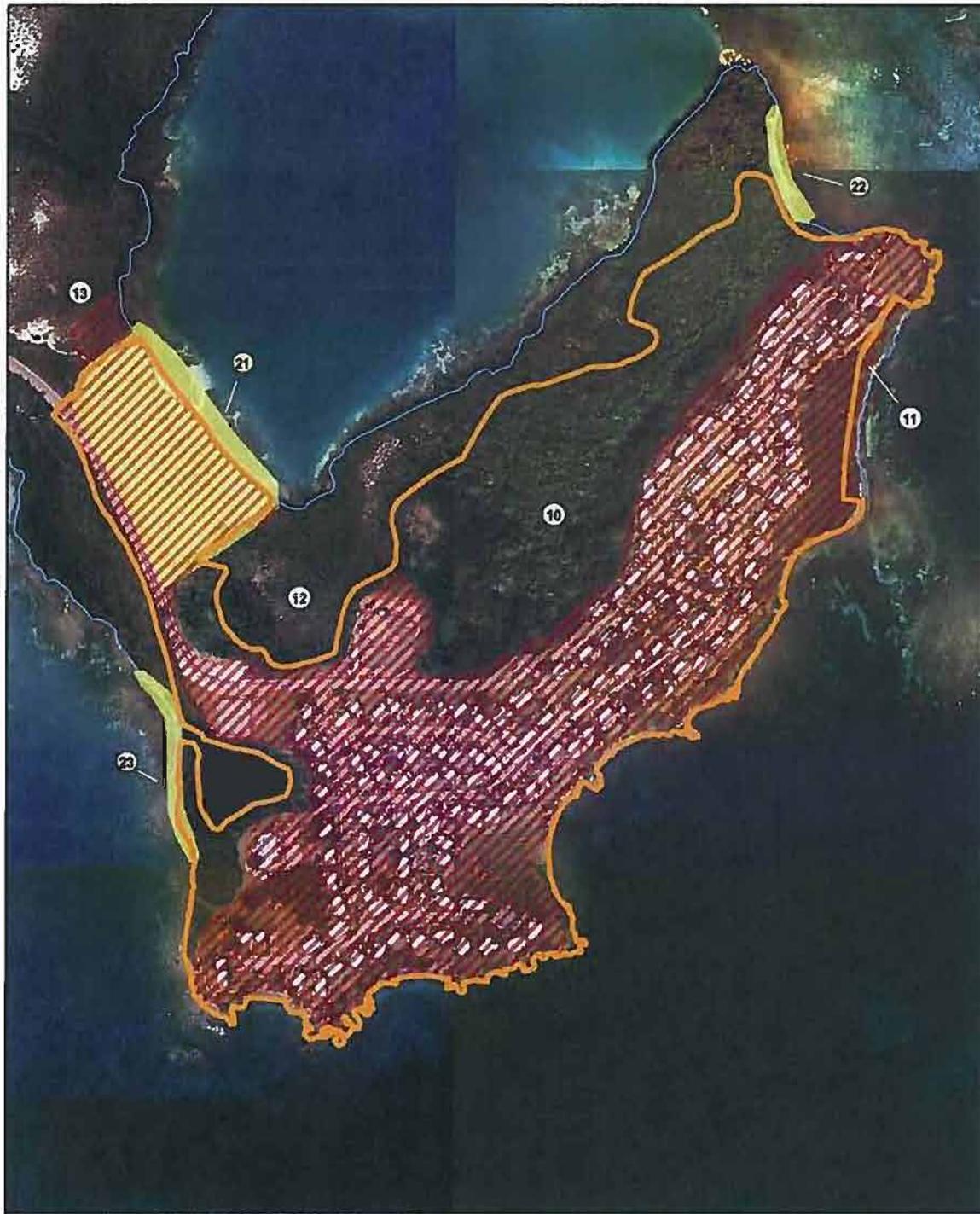
Legend

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

August 18, 2008

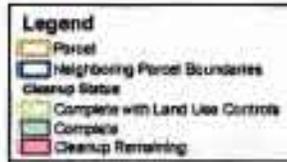


1 inch equals 498 Feet



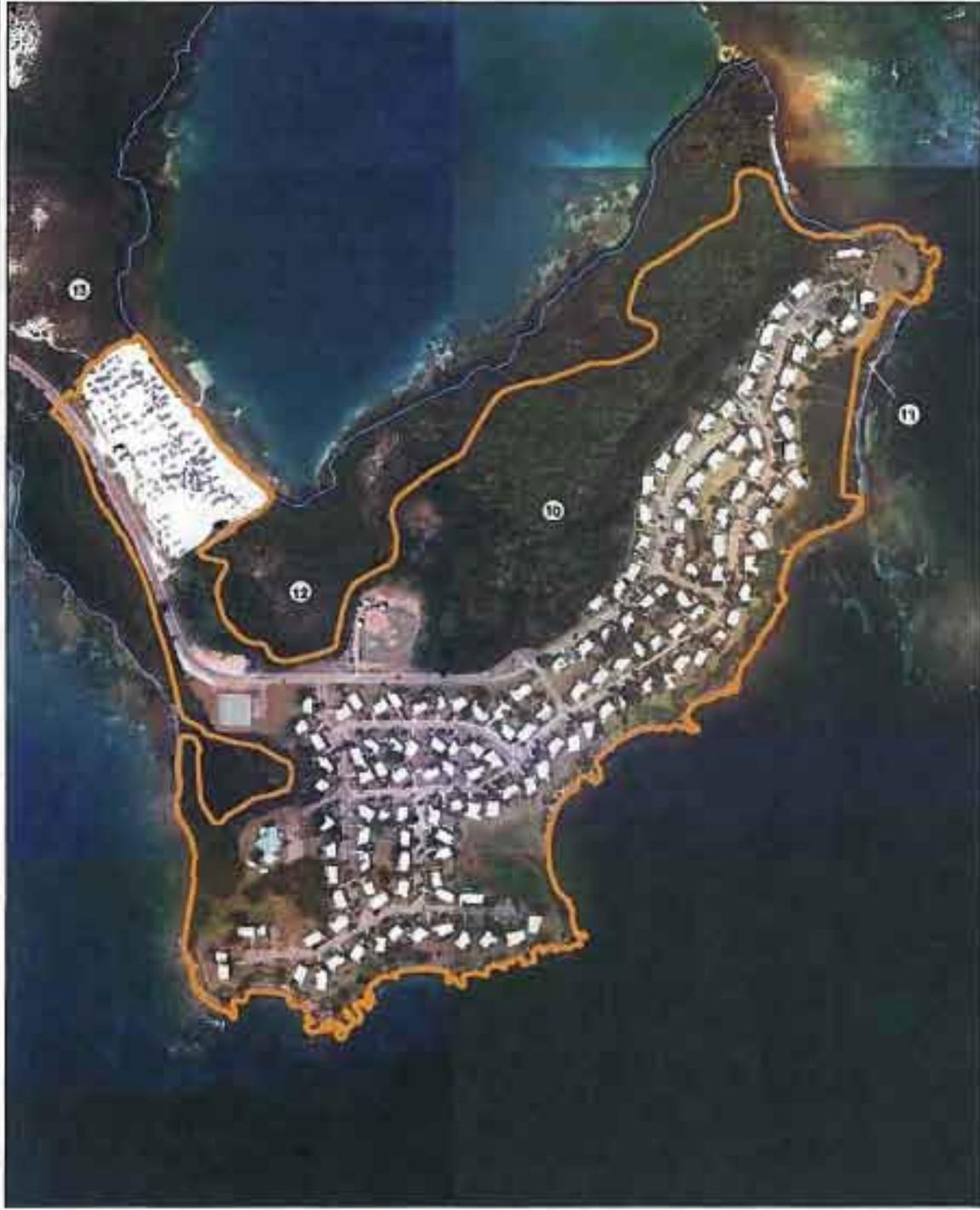
Parcel Index 10

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 11, 12, 13



August 18, 2008

1 inch equals 400 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 14

Common Name—Sale

Conveyance—Sale

Neighboring Parcel(s)—8, 13, 15, 16

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 13 and 16 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcel 13 and 16 should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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.

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 14

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 8, 13, 15, 16

Legend

- Parcel
- Neighboring Parcel Boundaries
- Yellow-shouldered Blackbird
- Feeding/Foraging Points
- Breeding Habitat

August 18, 2006



1 inch equals 507 Feet



Parcel Index 14

Common Name: Safe
Conveyance: Safe
Neighboring Parcel(s): 8, 13, 15, 16

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



August 18, 2006

1 inch equals 507 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 15

Common Name—Sale
Conveyance—Sale
Neighboring Parcel(s)—5, 8, 13, 14, 16

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 13 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to Parcel 13 should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- 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 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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 15

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 8, 13,
14, 16

Legend

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



August 18, 2008

1 inch equals 200 Feet



Parcel Index 15

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 5, 8, 13,
14, 16

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

August 18, 2006



1 inch equals 200 Feet



THREATENED AND ENDANGERED SPECIES CONSERVATION MEASURES—PARCEL 16

Common Name—Sale

Conveyance—Sale

Neighboring Parcel(s)—6, 8, 13, 15, 17, 25

Yellow-shouldered Blackbird

GENERAL REQUIREMENTS

- No development is allowed in Parcel 1 and 5 (Conservation).
- All development related activities (new construction, ground clearing, demolition/remodeling) adjacent to conservation parcels (1, 5) should occur between September 1 and March 15 (non-breeding season) or be restricted to an area 50 m from the parcel boundary from March 15-August 30 (breeding season).
- Notify the U.S. Fish and Wildlife Service (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.
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.
Property Sale/Lease	Notify buyer/lessee of all mitigation requirements (see above) and include mitigation with all legal documents.

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 16

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 6, 8, 13,
15, 17, 25

Legend

- Parcel
- Neighboring Parcel Boundaries
- Yellow-shouldered Blackbird
- Wading/Foraging Pairs
- Breeding Pairs



August 18, 2005

1 inch equals 325 Feet



Parcel Index 16

Common Name: Sale
Conveyance: Sale
Neighboring Parcel(s): 6, 8, 13,
15, 17, 25

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

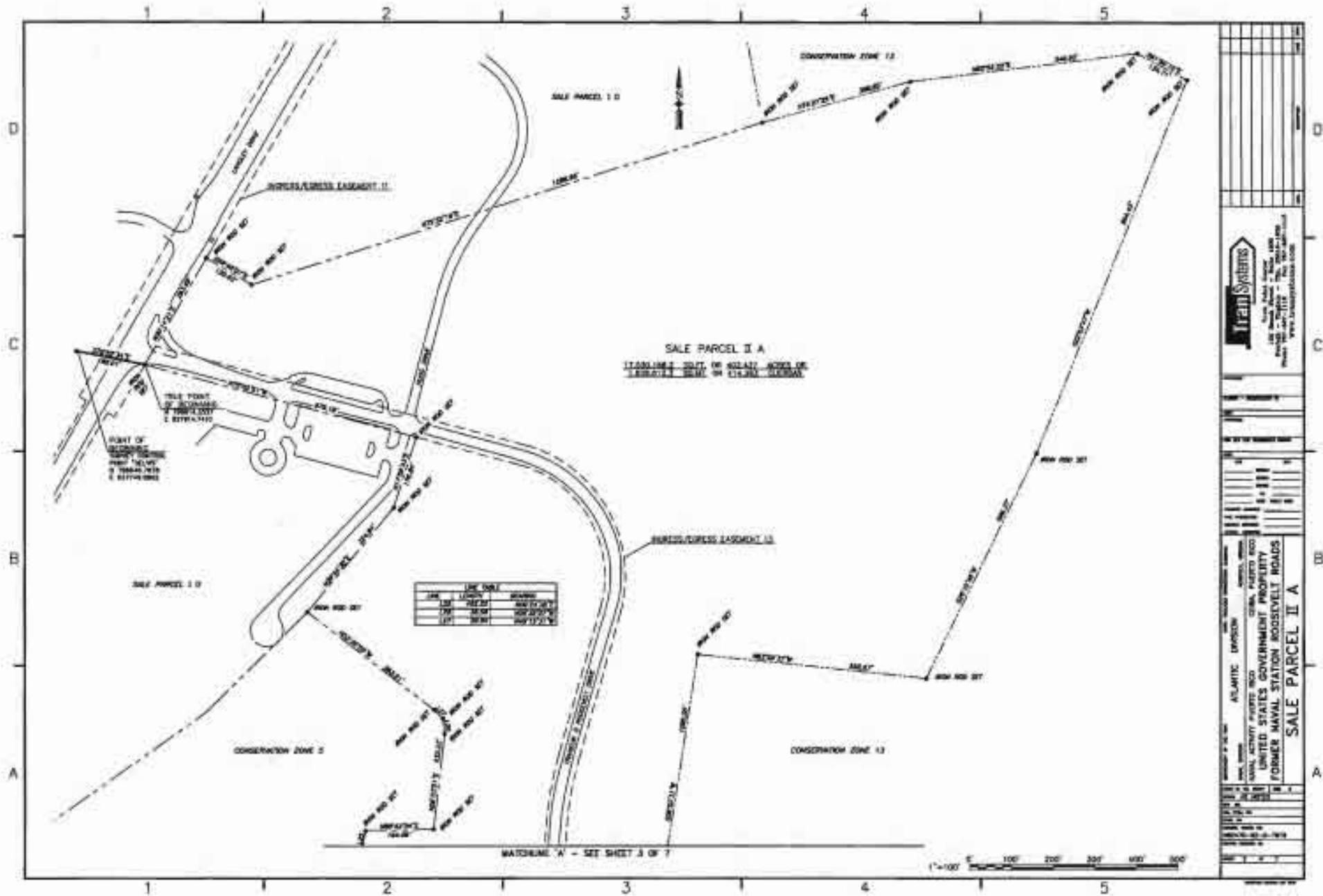
August 18, 2006



1 inch equals 250 Feet



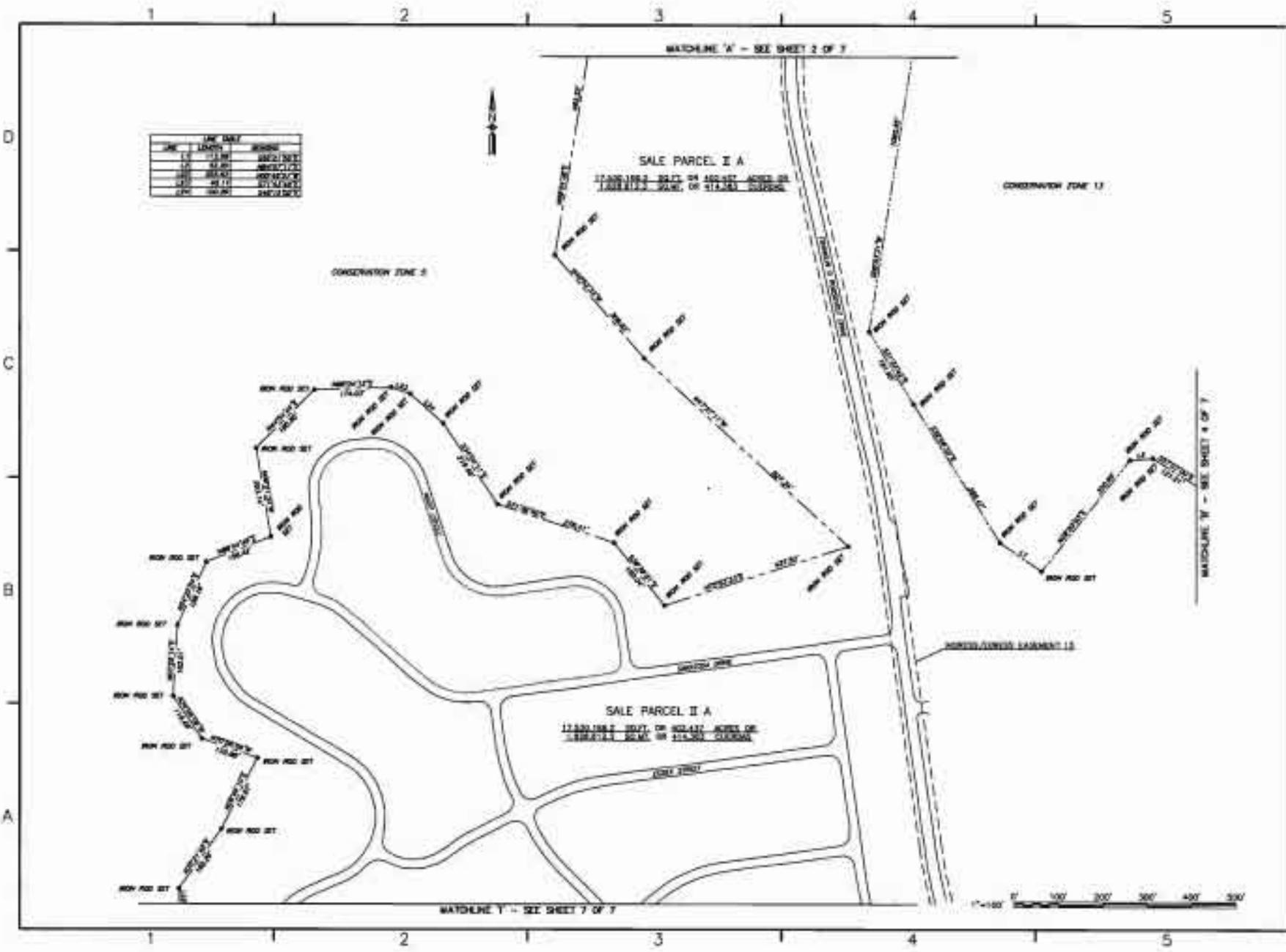
Exhibit D
Survey Map



LINE DATA		
LINE	LENGTH	BEARING
101	100.00	S 89° 59' 59" W
102	100.00	S 89° 59' 59" W
103	100.00	S 89° 59' 59" W

Iran Systems
 10000 10th Ave, Suite 1000
 Fort Lauderdale, FL 33304
 Phone: 954-575-1111
 Fax: 954-575-1112
 www.iran-systems.com

ATLANTIC DIVISION
 NAVAL ACTIVITY PUBLIC WORKS CENTER, FORT MONROE
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROADS
SALE PARCEL II A



LINE	LENGTH	BEARING
1	111.91	S89°21'30"E
2	32.91	S89°21'30"E
3	32.91	S89°21'30"E
4	32.91	S89°21'30"E
5	32.91	S89°21'30"E

SALE PARCEL I A

17,620,188.2 SQ. FT. OR 402.437 ACRES OR
 1,000,000.00 SQ. M. OR 417,363.000 HA.

CONSERVATION ZONE II

CONSERVATION ZONE I

SALE PARCEL II A

17,620,188.2 SQ. FT. OR 402.437 ACRES OR
 1,000,000.00 SQ. M. OR 417,363.000 HA.

SALE PARCEL II A



TransSystems
 1100 Peachtree Street, N.E.
 Atlanta, Georgia 30309
 Phone: 404-525-1100 Fax: 404-525-1101
 www.transystems.com

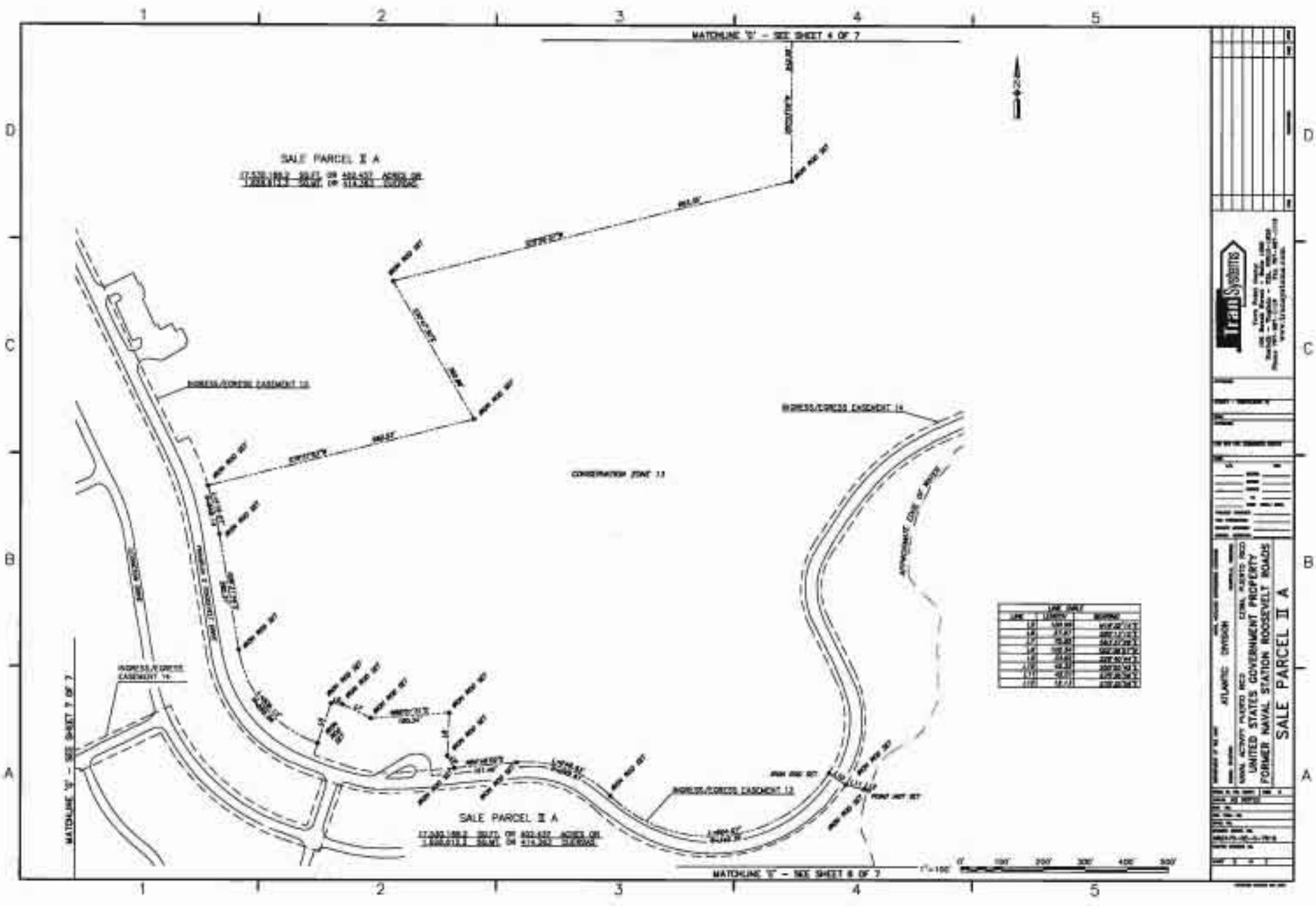
APPROVED BY THE ATLANTIC DIVISION
 NAVAL ACTIVITY PLANNING BOARD
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROAD



MATCHLINE Y - SEE SHEET 7 OF 7

MATCHLINE X - SEE SHEET 2 OF 7

MATCHLINE Y - SEE SHEET 4 OF 7



SALE PARCEL II A
 17,588,197.7 SQ. FT. OR 400,632 ACRES OF
 TRACTED LAND ON 414,581 ACRES

SALE PARCEL II A
 17,588,197.7 SQ. FT. OR 400,632 ACRES OF
 TRACTED LAND ON 414,581 ACRES

CONSERVATION ZONE 11

WATER/CRESS EASEMENT 14

WATER/CRESS EASEMENT 13

WATER/CRESS EASEMENT 12

LINE	LENGTH	AREA	PERCENT
1	1,121.1	1,234,567.8	7.0
2	2,345.6	2,567,890.1	14.6
3	3,456.7	3,789,012.3	21.5
4	4,567.8	5,012,345.6	28.5
5	5,678.9	6,234,567.8	35.4
6	6,789.0	7,456,789.0	42.3
7	7,890.1	8,678,901.2	49.2
8	8,901.2	9,901,234.5	56.1
9	9,012.3	11,123,456.7	63.0
10	10,123.4	12,345,678.9	70.0



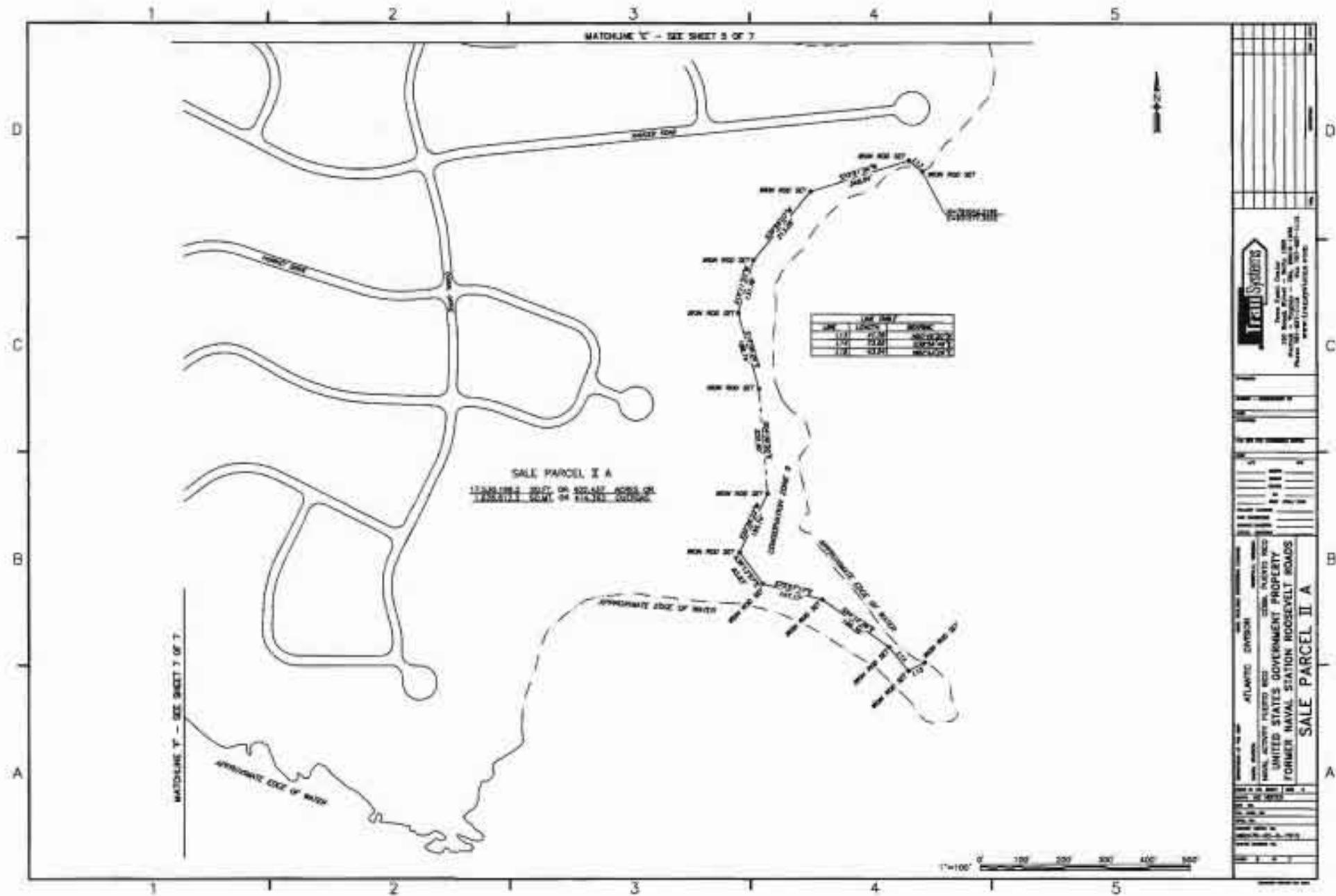
ATLANTIC DIVISION
 FEDERAL BUREAU OF INVESTIGATION
 UNITED STATES DEPARTMENT OF JUSTICE
 FORMER NAVAL STATION ROOSEVELT ROAD
 SALES PARCEL II A



MATCHLINE 'V' - SEE SHEET 7 OF 7

MATCHLINE 'V' - SEE SHEET 4 OF 7

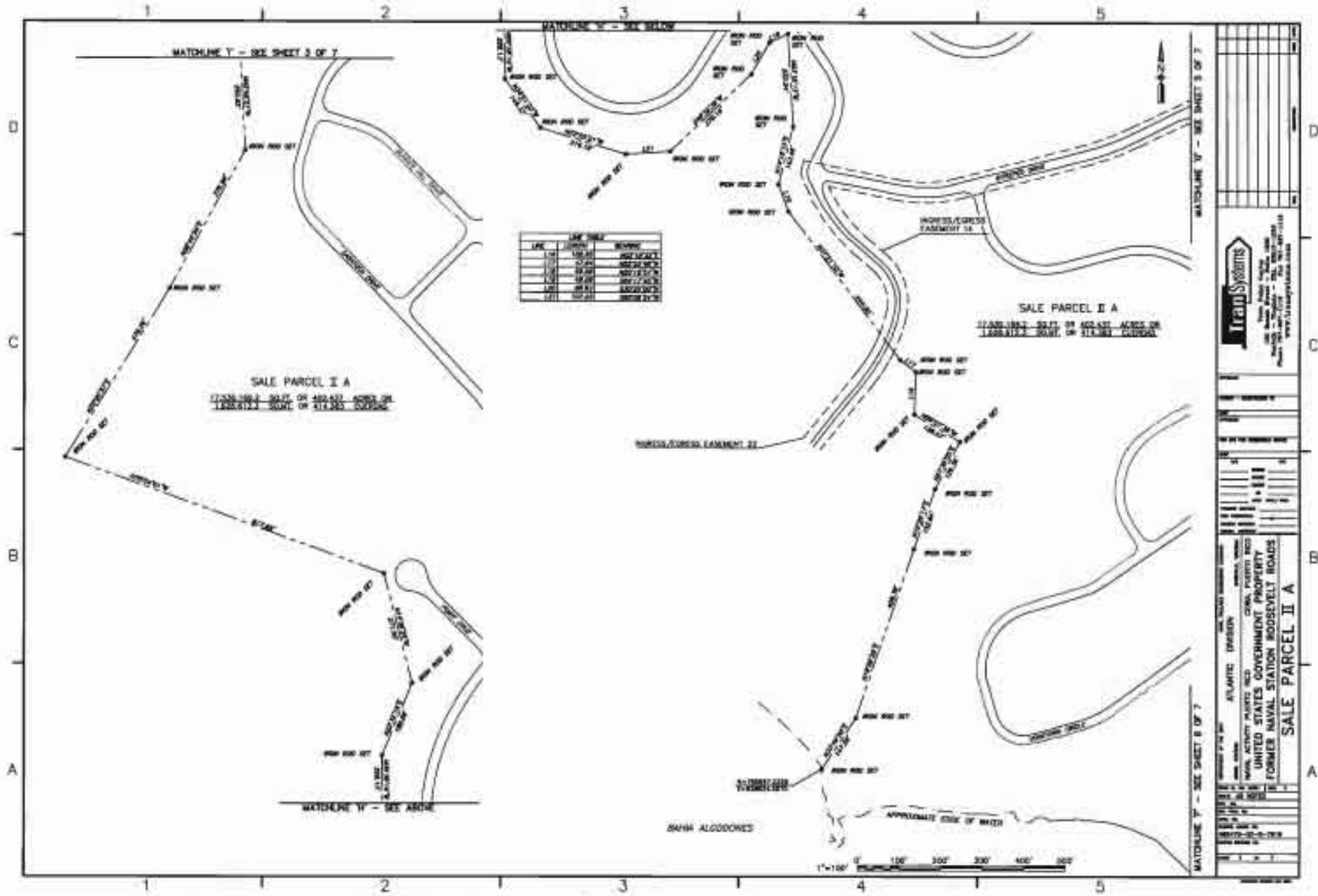
MATCHLINE 'V' - SEE SHEET 8 OF 7



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SALE PARCEL II A



LINE	TYPE	NOTES
L1	BOUNDARY	EXISTING
L2	BOUNDARY	EXISTING
L3	BOUNDARY	EXISTING
L4	BOUNDARY	EXISTING
L5	BOUNDARY	EXISTING
L6	BOUNDARY	EXISTING
L7	BOUNDARY	EXISTING
L8	BOUNDARY	EXISTING
L9	BOUNDARY	EXISTING
L10	BOUNDARY	EXISTING
L11	BOUNDARY	EXISTING
L12	BOUNDARY	EXISTING
L13	BOUNDARY	EXISTING
L14	BOUNDARY	EXISTING
L15	BOUNDARY	EXISTING
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L75	BOUNDARY	EXISTING
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L94	BOUNDARY	EXISTING
L95	BOUNDARY	EXISTING
L96	BOUNDARY	EXISTING
L97	BOUNDARY	EXISTING
L98	BOUNDARY	EXISTING
L99	BOUNDARY	EXISTING
L100	BOUNDARY	EXISTING

SALE PARCEL I A
 17,226.284 SQ. FT. OR 0.394 ACRES OR
 1,282,817.5 SQ. FT. OR 29.365 ACRES

SALE PARCEL II A
 17,226.284 SQ. FT. OR 0.394 ACRES OR
 1,282,817.5 SQ. FT. OR 29.365 ACRES



SALE PARCEL II A
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROADS



MATCHLINE V - SEE SHEET 3 OF 7 (top)
 MATCHLINE V - SEE SHEET 6 OF 7 (bottom)

D
C
B
A

1 2 3 4 5

1 2 3 4 5

LEGAL DESCRIPTION FOR SALE PARCEL IIA

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'DELVIS' and having a northing of 796646.7678 and an easting of 927749.8902 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL II A". Thence S78°52'34"E 168.01' to an iron rod set, the True Point of Beginning, having a northing of 796614.3537 and an easting of 927914.7410:

Thence N30°14'21"E 293.69' to an iron rod set;
Thence S59°48'07"E 125.93' to an iron rod set;
Thence N72°32'16"E 1288.66' to an iron rod set;
Thence N74°27'25"E 368.85' to an iron rod set;
Thence N82°52'22"E 549.92' to an iron rod set;
Thence S61°50'10"E 134.71' to an iron rod set;
Thence S22°03'47"W 964.43' to an iron rod set;
Thence S26°10'48"W 599.37' to an iron rod set;
Thence N83°59'37"W 552.67' to an iron rod set;
Thence S08°53'31"W 1095.55' to an iron rod set;
Thence S31°33'42"E 191.95' to an iron rod set;
Thence S32°08'22"E 369.47' to an iron rod set;
Thence S55°21'55"E 113.66' to an iron rod set;
Thence N38°20'03"E 320.99' to an iron rod set;
Thence N84°57'17"E 52.20' to an iron rod set;
Thence S57°57'00"E 121.21' to an iron rod set;
Thence S52°41'53"E 85.04' to an iron rod set;
Thence N56°14'39"E 285.03' to an iron rod set;
Thence N07°36'22"W 171.77' to an iron rod set;
Thence N34°34'26"W 439.85' to an iron rod set;
Thence N33°05'48"E 315.39' to an iron rod set;
Thence N74°17'17"E 370.33' to an iron rod set;
Thence N34°27'48"E 342.62' to an iron rod set;
Thence S74°42'52"E 421.32' to an iron rod set;
Thence S71°43'47"E 304.80' to an iron rod set;
Thence S26°34'31"E 108.86' to an iron rod set;
Thence S31°21'54"W 200.39' to an iron rod set;
Thence N87°34'09"W 598.54' to an iron rod set;
Thence S24°04'28"E 568.33' to an iron rod set;
Thence S29°04'14"E 1361.02' to an iron rod set;
Thence S67°01'49"W 288.42' to an iron rod set;
Thence S00°03'09"W 542.55' to an iron rod set;
Thence S75°55'37"W 993.35' to an iron rod set;
Thence S30°47'30"E 382.86' to an iron rod set;
Thence S75°57'53"W 662.53' to an iron rod set;
Thence following a curve to an iron rod set; with a long chord of 118.97', a chord bearing of S13°32'47"E,
 Radius= 849.14'
 Arc=119.07'
Thence S09°31'46"E 282.37' to an iron rod set;
Thence following a curve to an iron rod set; with a long chord of 294.29', a chord bearing of S40°30'35"E,
 Radius= 285.86'
 Arc=309.13'
Thence N18°32'14"E 100.99' to an iron rod set;
Thence S85°13'10"E 27.97' to an iron rod set;

Thence S63°37'29"E 75.85' to an iron rod set;
Thence N86°01'31"E 190.34' to an iron rod set;
Thence S02°38'57"W 102.54' to an iron rod set;
Thence S29°40'44"E 33.82' to an iron rod set;
Thence N84°48'02"E 151.40' to an iron rod set;
Thence following a curve to an iron rod set; with a long chord of 241.06', a chord bearing of S70°36'19"E,

Radius= 289.61'

Arc=248.63'

Thence following a curve to an iron rod set; with a long chord of 530.38', a chord bearing of N84°01'47"E,

Radius= 346.39'

Arc=604.07'

Thence S55°55'45"E 49.22' to an iron rod set;

Thence S75°35'56"E 45.01' to an iron rod set;

Thence S75°35'56"E 12.13' to a point not set at the approximate edge of water of Ensenada Honda;

Thence South along the approximate edge of water of Ensenada Honda to an iron rod set having a northing of 791042.2146 and an easting of 931277.3202;

Thence N50°46'20"W 41.29' to an iron rod set;

Thence S72°51'34"W 246.04' to an iron rod set;

Thence S39°58'07"W 213.05' to an iron rod set;

Thence S16°11'23"W 131.78' to an iron rod set;

Thence S15°08'29"E 188.74' to an iron rod set;

Thence S04°39'50"E 252.60' to an iron rod set;

Thence S25°28'22"W 155.74' to an iron rod set;

Thence S36°13'57"E 93.83' to an iron rod set;

Thence S75°07'17"E 147.17' to an iron rod set;

Thence S54°12'38"E 196.35' to an iron rod set;

Thence S38°58'48"E 73.05' to an iron rod set;

Thence N62°43'26"E 43.54' to an iron rod set on the approximate edge of water of Ensenada Honda;

Thence Southeast along the approximate edge of water of Ensenada Honda;

Thence West along the approximate edge of water of Ensenada Honda;

Thence Southwest along the approximate edge of water of Ensenada Honda;

Thence Northwest along the approximate edge of water of Ensenada Honda to an iron rod set having a northing of 789987.0329 and an easting of 928624.5970;

Thence N33°49'58"E 147.58' to an iron rod set;

Thence N18°59'26"E 428.38' to an iron rod set;

Thence N19°29'17"E 152.84' to an iron rod set;

Thence N27°35'05"E 129.36' to an iron rod set;

Thence N59°07'38"W 128.07' to an iron rod set;

Thence N02°18'32"E 102.65' to an iron rod set;

Thence N52°52'48"W 47.94' to an iron rod set;

Thence N37°21'10"W 444.05' to an iron rod set;

Thence N20°16'57"W 69.58' to an iron rod set;

Thence N14°16'15"E 143.46' to an iron rod set;

Thence N03°18'13"W 222.24' to an iron rod set;

Thence S64°17'45"W 49.06' to an iron rod set;

Thence S30°25'00"W 86.93' to an iron rod set;

Thence S46°32'39"W 270.16' to an iron rod set;

Thence S86°09'24"W 107.23' to an iron rod set;

Thence N72°55'21"W 216.16' to an iron rod set;

Thence N36°01'23"W 145.33' to an iron rod set;

Thence N00°38'19"W 228.13' to an iron rod set;

Thence N22°32'18"E 188.66' to an iron rod set;

Thence N14°36'26"W 271.50' to an iron rod set;
Thence N70°04'01"W 817.68' to an iron rod set;
Thence N32°00'57"E 476.26' to an iron rod set;
Thence N28°46'50"E 376.98' to an iron rod set;
Thence N02°48'57"W 255.62' to an iron rod set;
Thence N35°21'48"E 166.29' to an iron rod set;
Thence N26°49'10"E 179.97' to an iron rod set;
Thence N70°58'06"W 132.88' to an iron rod set;
Thence N34°06'09"W 116.68' to an iron rod set;
Thence N03°28'14"E 162.01' to an iron rod set;
Thence N24°25'54"E 158.18' to an iron rod set;
Thence N68°44'45"E 156.42' to an iron rod set;
Thence N09°21'33"W 203.14' to an iron rod set;
Thence N44°54'44"E 185.85' to an iron rod set;
Thence N88°04'12"E 174.03' to an iron rod set;
Thence S71°43'46"E 46.11' to an iron rod set;
Thence S48°12'02"E 100.29' to an iron rod set;
Thence S34°04'11"E 219.49' to an iron rod set;
Thence S71°39'50"E 278.41' to an iron rod set;
Thence S38°39'51"E 182.04' to an iron rod set;
Thence N72°03'33"E 437.50' to an iron rod set;
Thence N47°27'11"W 627.34' to an iron rod set;
Thence N40°53'33"W 308.83' to an iron rod set;
Thence N09°24'38"E 492.22' to an iron rod set;
Thence N88°42'04"E 164.09' to an iron rod set;
Thence N06°33'51"E 232.33' to an iron rod set;
Thence N06°35'07"W 36.56' to an iron rod set;
Thence N45°15'31"W 29.84' to an iron rod set;
Thence N52°30'55"W 383.91' to an iron rod set;
Thence N39°44'38"E 324.94' to an iron rod set;
Thence N17°59'43"E 176.84' to an iron rod set;
Thence N75°02'51"W 675.18' to an iron rod set, the True Point of Beginning.

Said parcel containing 17,530,166.2 square feet or 402.437 acres, which equates to 1,628,612.3 square meters or 414.363 cuerdas.

Said parcel is subject to the following easements as shown on plats titled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 13" and "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS EASEMENT 14" prepared by TranSystems Corporation and sealed by Luis Berrios Montes on XX, 2007.

SURVEY NOTES

1. BOUNDARY SURVEY PREPARED BY TRANSSYSTEMS CORPORATION FROM FIELD DATA COLLECTED IN SEPTEMBER & OCTOBER 2008. FIELD PROCEDURES, CALCULATIONS AND FINAL PLAN HAVE BEEN REVIEWED FOR CONTENT BY LUIS BARRERA MARTIN & ASSOCIATES OF VEGA SALA, PUERTO RICO.
2. HORIZONTAL COORDINATES SHOWN HEREON ARE IN FEET AND REFER TO THE NORTH AMERICAN 83/80 STATE PLANE COORDINATE SYSTEM AND 83 (1983 ADJUSTMENT). HORIZONTAL COORDINATE WITH HORIZONTAL LONG RUN PROPERTY ARE PROVIDED AND ARE REFERENCED TO NATIONAL GEODESIC SURVEY MONUMENTS HAZEL (196 SURVEY), PUERTO RICO (1983/81), MONUMENT 7 (70 MONUMENT) AND ST. ANTON (70 MONUMENT).
3. THE FOLLOWING PLATS AND RECORDS WERE USED TO ESTABLISH THE BOUNDARY LINES AS SHOWN ON THIS PLAN:
 - a. PLAT TITLE "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD" BOUNDARY REDEVELOPMENT SURVEY, PREPARED BY TRANSSYSTEMS CORPORATION AND LUIS BARRERA MARTIN, DATE: FEBRUARY 04, 2009.
 - b. PLAT TITLE "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROAD" BOUNDARY REDEVELOPMENT SURVEY, PREPARED BY TRANSSYSTEMS CORPORATION AND LUIS BARRERA MARTIN, DATE: FEBRUARY 04, 2009.
4. PLANNING DATA AND ZONING PROVIDED BY ROSEMARY CARR ASSOCIATES PROFESSIONAL, INC. ZONING SURVEY PERFORMED BY ROSEMARY CARR ASSOCIATES PROFESSIONAL, INC. SURVEY PLAN: FEBRUARY 1999.
5. DUE TO THE SPECIALIZED NATURE OF THE SUBJECT PROPERTY, TERRAINS-WHICHNE REGULATIONS ARE APPLICABLE, AS A ONE-DAY NON-CONVENTIONAL, ALL FUTURE RECORDS OF THIS SUBJECT PROPERTY BY TRANSSYSTEMS SHALL RECORD THE BOUNDARY OF THESE LANDS WITH REFERENCE TO THE TERRAINS-WHICHNE ZONING REGULATIONS. THE PUBLIC ACCESS TO PROPERTY TRANSFERRED TO OTHER FEDERAL AGENCIES SHALL REMAIN STATUS BUI.
6. NOTE: THIS PLAN SHOWS CALCULATIONS OF RECORDS FOUND IN THE NAVAL REAL ESTATE OFFICE. THIS PLAN MAY NOT SHOW ALL GRANTS OR AGREEMENTS THAT COULD AFFECT SUBJECT PROPERTY.

LEGEND

- CONCRETE BOUNDARY MARK
- PROPERTY LINE
- ADJACENT USE

LINE	LINE TYPE	REMARKS
1	CONCRETE	CONCRETE BOUNDARY MARK
2	SOLID	PROPERTY LINE
3	DASHED	ADJACENT USE
4	DASHED	ADJACENT USE
5	DASHED	ADJACENT USE

SALE PARCEL II B
 5,725,244.30 SQ. FT. OR 131.985 ACRES OR
 145,167.52 SQ. FT. OR 3.3282 ACRES



LOCATION MAP
NOT TO SCALE



NAVAL ACTIVITY PUERTO RICO
NOT TO SCALE



CERTIFICATION

I, LUIS BARRERA MARTIN, CERTIFY THAT THE INFORMATION THAT FOLLOWS REPRESENTS FAITHFULLY THAT I PERSONALY PREPARED OR THE DATA ACQUISITION BY THE INSTRUMENTATION THAT HAS BEEN MADE BY ME.

DATE: 12/10/09
 LUIS BARRERA MARTIN
 LUIS BARRERA MARTIN
 Surveyor License No. 3402



MATCHLINE 'C' - SEE SHEET 2 OF 2

MATCHLINE 'A' - SEE SHEET 3 OF 2

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 www.transystems.com

ATLANTIC DIVISION
 NAVAL ACTIVITY PUERTO RICO
 UNITED STATES GOVERNMENT PROPERTY
 FORMER NAVAL STATION ROOSEVELT ROAD
SALE PARCEL II B

DATE: 12/10/09
 LUIS BARRERA MARTIN
 LUIS BARRERA MARTIN
 Surveyor License No. 3402

LEGAL DESCRIPTION FOR SALE PARCEL II B

Beginning at a survey control point in the Ward of Guayacan, said point being a brass disk set in concrete. Said point also known as 'CASCAJO' and having a northing of 792718.7899 and an easting of 935655.9464 noted as the Point of Beginning on the plat labeled "UNITED STATES GOVERNMENT PROPERTY FORMER NAVAL STATION ROOSEVELT ROADS SALE PARCEL II B". Thence S00°09'52"E 191.46' to an iron rod set on the approximate edge of water of Ensenada Honda, the True Point of Beginning, having a northing of 792527.3349 and an easting of 935656.4956:

Thence S78°11'44"W 72.71' to an iron rod set;

Thence S39°17'10"W 197.50' to an iron rod set;

Thence S08°35'07"W 554.83' to an iron rod set;

Thence S56°28'03"E 86.69' to an iron rod set on the approximate edge of water of Ensenada Honda having a northing of 791763.1020 and an easting of 935449.7085;

Thence Southwest along the approximate edge of water of Vieques Passage;

Thence West along the approximate edge of water of Vieques Passage;

Thence North along the approximate edge of water to an iron rod set having a northing of 790646.4126 and an easting of 933016.8045

Thence S88°04'00"E 176.63' to an iron rod set

Thence N63°47'43"E 121.99' to an iron rod set;

Thence N80°58'39"E 153.66' to an iron rod set;

Thence N14°40'48"W 230.17' to an iron rod set;

Thence N87°12'00"W 269.55' to an iron rod set;

Thence N27°02'40"W 182.08' to an iron rod set;

Thence N20°29'37"W 194.61' to an iron rod set;

Thence N20°19'37"W 302.30' to an iron rod set;

Thence following a curve to an iron rod set; with a long chord of 136.56', a chord bearing of N23°36'05"W,

Radius= 1195.39'

Arc=136.64'

Thence N26°52'33"W 259.49' to an iron rod set;

Thence following a curve to an iron rod set; with a long chord of 230.12', a chord bearing of N34°09' 10"W,

Radius= 908.39'

Arc=230.74'

Thence N48°34'14"E 49.22' to an iron rod set;

Thence N48°34'14"E 55.09' to an iron rod set;

Thence N17°43'35"E 80.21' to an iron rod set;

Thence N48°47'03"E 102.45' to an iron rod set;

Thence N71°08'08"E 97.48' to an iron rod set;

Thence N71°08'08"E 33.22' to a point not set on the approximate edge of water of Ensenada Honda having a northing of 792384.4126 and an easting of 932873.2568;

Thence Southeast along the approximate edge of water of Ensenada Honda to an iron rod set having a northing of 791812.7113 and an easting of 933338.2827;

Thence S45°58'22"W 97.06' to an iron rod set;

Thence S48°49'44"W 93.85' to an iron rod set;

Thence S58°41'06"W 138.43' to an iron rod set;

Thence S18°28'24"E 268.60' to an iron rod set;

Thence S74°04'45"E 425.18' to an iron rod set;

Thence N17°26'49"E 254.40' to an iron rod set;

Thence N56°30'28"E 110.37' to an iron rod set;

Thence N07°44'44"E 276.03' to an iron rod set;

Thence N36°34'58"E 234.19' to an iron rod set;

Thence N55°30'53"E 337.29' to an iron rod set;

Thence N68°31'23"E 538.98' to an iron rod set;

Thence N03°56'03"E 232.44' to an iron rod set;

Thence N47°51'06"E 344.84' to an iron rod set;
Thence N57°17'07"E 199.60' to an iron rod set;
Thence S21°52'30"E 192.18' to an iron rod set;
Thence S79°06'21"E 190.07' to an iron rod set;
Thence N85°42'44"E 46.37' to an iron rod set;
Thence N58°08'36"E 48.91' to an iron rod set on the approximate edge of water of Ensenada Honda;
Thence East along the approximate edge of water of Ensenada Honda;
Thence South along the approximate edge of water of Ensenada Honda to the True Point of Beginning.

Said parcel containing 4,124,358.8 square feet or 94.682 acres, which equates to 383,167.0 square meters or 97.488 cuerdas.

Exhibit E

Tables

TABLE 1

**NAVAL ACTIVITY PUERTO RICO
SALE PARCEL II FOST
NON-HOUSING FACILITIES LIST
PAGE 1 of 2**

Facility #	Former User	Name	Area	Unit	Yr Built
673	-	MAINTENANCE STORAGE BLDG	-	-	-
793	HSG	HOUSING OFFICE	6400	SF	1966
884	PWD	SEWAGE PUMP STATION	280	SF	1959
885	HSG	TEMP LODGING	8638	SF	1960
886	NAVY CAMPUS	NAVY CAMPUS	7918	SF	1960
888	HOSP	MEDICAL CLINICS (EIP/MDO)	10583	SF	1960
968	PWD	SEWAGE PUMPING STA(CAPEHART)	280	SF	1959
1022	-	-	-	-	-
1028	HSG	SNACK BAR BY HOUSING POOL	276	SF	-
1073	PWD	BUS SHLTR FDR DR (HSG)	140	SF	1962
1075	PWD	BUS SHLTR/CASCAJO OFFCRS HSG	190	SF	1962
1303	MWR	PLAYING FIELD BASEBALL	-	-	1961
1316	HSG	PLAYGROUND	-	-	-
1469	MWR	EM SWIM POOL/PUMP/FLTR HSE	592	SF	1960
1471	PWD	SEWAGE PUMPING STA CAPEHART	360	SF	1959
1513	PWD	SEWAGE LIFT STATION/TOILET	170	SF	1959
1577	MWR	BATHROOM-SNACK BAR EM POOL	1056	SF	1962
1581	PWD	BUS SHLTR BY COMM CTR	140	SF	1962
1583	MWR	OFFICERS SW POOL BATHOUSE	396	SF	1963
1660	HSG	YOUTH CENTER	1800	SF	-
1698	PWD	CAPEHART CARPENTRY SHOP	1600	SF	1970
1746	AFWTF	LIGHT TOWER CABRAS ISLAND	-	-	-
1755	HSG	HOUSING MAINTENANCE SHOP	4000	SF	1971
1756	HSG	HOUSING STORAGE/WHSE	8000	SF	1974
1800	MWR	TENNIS COURT	1600	SF	1974
1811	HSG	COMMUNITY CENTER	5029	SF	1977
1916	PWD	SEWAGE LIFT/ALGODONES APTS.	64	SF	1978
1917	PWD	SEWAGE LIFT/TURNKEY HSG.	64	SF	1978
1918	MWR	SOFTBALL FIELD (ALGODONES)	-	-	1971
1919	HSG	PUBLIC TOILET	-	-	-
1920	PWD	STANDBY GEN BY BLDG #1471	224	SF	1977
1923	-	TOILET NEXT TO PUMP HOUSE 1513	-	-	-
1924	PWD	SEWAGE PUMP ST	64	SF	1971
1940	PWD	SUBSTA BY FUEL TKS 56A/56B	-	-	1976
1942	MWR	REC GRNDS COMM BEACH	4256	SF	1978
2170	MWR	COMMUNITY BEACH HEADS	390	SF	1984
2200	ACSS	ACSS HIGH SCHOOL	10961	SF	1960
2203	PWD	SWGE LIFT STA BY B# 1811	-	-	1987
2221	MWR	MALE/FEM HEAD AT BALLFIELD	75	SF	1986
2223	MWR	COMM. BEACH BALLFLD B&DUGOUT	-	-	1986

TABLE 1

**NAVAL ACTIVITY PUERTO RICO
SALE PARCEL II FOST
NON-HOUSING FACILITIES LIST
PAGE 2 of 2**

Facility #	Former User	Name	Area	Unit	Yr Built
2237	MWR	CONCESS STGECOM BCH BALLFL	144	SF	1986
2251	MWR	ADDTNL STGE B1811	336	SF	1987
2295	ACSS	ACSS HIGH SCHOOL GYM	-	-	1960
2305	MWR	YOUTH CENTER	7611	SF	1990
2378	MWR	SWIM POOL FILTER HOSE	144	SF	1978
2382	PWD	SWGE PUMP STATION	450	SF	1995

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

ACSS Antilles Consolidated School System
AFWTF Atlantic Fleet Weapons Training Facility
HOSP Hospital
HSG Housing
MWR Morale, Welfare and Recreation
PWD Public Works Department

TABLE 2

**NAVAL ACTIVITY PUERTO RICO
SALE II PARCEL FOST
AST AND UST LIST**

Number	Type	Location or User	Capacity	Material Stored	Year Installed	Year Removed
1920	AST (Vaulted)	PWD	500	Diesel	-	Active
1972	AST (Vaulted)	PWD	250	Diesel	-	Active
2406	AST (Vaulted)	PWD	550	Diesel	-	Active
1513	Former UST	1513/PWD	280	Diesel	-	1996

- Information not available or unknown

TABLE 3

**NAVAL ACTIVITY PUERTO RICO
SALE PARCEL II FOST
NON-HOUSING ASBESTOS-CONTAINING MATERIAL INSPECTION RESULTS**

Facility #	Name	ACM Identified	Comments
673	MAINTENANCE STORAGE BLDG	NI	
793	HOUSING OFFICE	Y	No FAD ACM
884	SEWAGE PUMP STATION	N	
885	TEMP LODGING	Y	No FAD ACM
886	NAVY CAMPUS	N	
888	MEDICAL CLINICS (EIP/MDO)	Y	No FAD ACM
968	SEWAGE PUMPING STA(CAPEHART)	Y	No FAD ACM
1022	-	NI	
1026	SNACK BAR BY HOUSING POOL	NI	
1073	BUS SHLTR FDR DR (HSG)	N	
1075	BUS SHLTR/CASCAJO OFFCRS HSG	N	
1303	PLAYING FIELD BASEBALL	NI	
1316	PLAYGROUND	NI	
1469	EM SWIM POOL/PUMP/FLTR HSE	NI	
1471	SEWAGE PUMPING STA CAPEHART	N	
1513	SEWAGE LIFT STATION/TOILET	NI	
1577	BATHROOM-SNACK BAR EM POOL	N	
1581	BUS SHLTR BY COMM CTR	N	
1583	OFFICERS SW POOL BATHOUSE	N	
1660	YOUTH CENTER	NI	
1698	CAPEHART CARPENTRY SHOP	N	
1746	LIGHT TOWER CABRAS ISLAND	NI	
1755	HOUSING MAINTENANCE SHOP	Y	No FAD ACM
1756	HOUSING STORAGE/WHSE	N	
1800	TENNIS COURT	NI	
1811	COMMUNITY CENTER	Y	No FAD ACM
1918	SEWAGE LIFT/ALGODONES APTS.	N	
1917	SEWAGE LIFT/TURNKEY HSG.	N	
1918	SOFTBALL FIELD (ALGODONES)	NI	
1919	PUBLIC TOILET	NI	
1920	STANDBY GEN BY BLDG #1471	N	
1923	TOILET NEXT TO PUMP HOUSE 1513	NI	
1924	SEWAGE PUMP ST	N	
1940	SUBSTA BY FUEL TKS 56A/56B	NI	
1942	REC GRNDS COMM BEACH	NI	
2170	COMMUNITY BEACH HEADS	N	
2200	ACSS HIGH SCHOOL	NI	
2203	SWGE LIFT STA BY B# 1811	NI	
2221	MALE/FEM HEAD AT BALLFIELD	N	
2223	COMM. BEACH BALLFLD B&DUGOUT	NI	
2237	CONCESS STGECOM BCH BALLFL	N	
2251	ADDTNL STGE B1811	N	
2295	ACSS HIGH SCHOOL GYM	NI	
2305	YOUTH CENTER	N	
2378	SWIM POOL FILTER HOSE	NI	
2382	SWGE PUMP STATION	N	

Notes: Y = Yes
 N = No
 NI = Not Inspected
 Hazard = friable, accessible and damaged (FAD) asbestos-containing material (ACM)

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

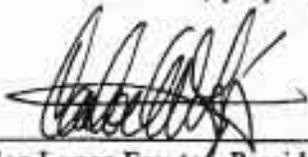


R. DAVID CRISWELL, P. E.
BRAC Environmental Coordinator

8/27/06
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 Inspection Reports
and
Lead-Based Paint Inspection/Risk Assessment Report

Final
Asbestos Inspection Report
for
Military Family Housing
Naval Activity Puerto Rico
Ceiba, Puerto Rico

Contract N62472-01-D-1440 • Project Number 15 • June 2005



Prepared by
Michael Baker Jr., Inc.

Baker

ChallengeUs.

Under Contract with
Department of the Navy
Naval Facilities Engineering Command
Engineering Field Activity, Northeast



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Following Text

Table 1	Summary of Homogeneous Materials (for each housing community)
Table 2	Summary of Identified ACM (for each housing community)

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Appendix A	Training Certificates and Certificates of Accreditation
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Appendix D	Photographs

EXECUTIVE SUMMARY

The US Navy Engineering Field Activity Northeast (EFANE) contracted Baker to perform an asbestos-containing material (ACM) inspection of military family housing at Naval Activity Puerto Rico (NAPR), located near Ceiba, Puerto Rico. The work was performed so that the federal government can transfer the properties. The Navy is considered the owner of all properties referenced in this report. The work was performed in accordance with the Scope of Work: Lead-Based Paint Inspection and Risk Assessment, and Asbestos Survey for Residential Property Transfer, dated September 9, 2004, under Contract Number N62472-01-D-1440. Field work for the project was performed from January 5, 2005 to February 11, 2005.

NAPR housing was reportedly constructed between 1960 and 1975 and contains 962 two, three, and four-bedroom apartment style, duplex, and single-family housing units. NAPR housing consists of eight communities: Algodones, Caribe Breeze, Cascajo Point, Coast Guard, FDR Drive, Manatee Bay, Mangrove Manor, and Rainbow Hill. Twenty-seven of the housing units in Manatee Bay are of original construction, while the remaining 935 units were renovated to varying degrees beginning in 1989. The square footage of the units ranges from 1023 to 2105 square feet. The concrete-framed buildings have concrete or ceramic exterior finishes. Interior walls are painted gypsum board and concrete. The units are generally in good condition.

Table A below summarizes the renovation history for the communities, as provided by the housing office manager.

Table A. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Algodons				
889C, 889E, 889F, 889G, 889H, 891A, 891D, 893B, 893C, 895A, 895B, 895C, 897A, 897B, 897D, 897F, 897G, 897H, and 899B	Two, Three, and Four Bedroom Apartment-Style Units	1960	1991	<ul style="list-style-type: none"> • Installation of carpeting • Remodel bathrooms and kitchens • Replace doors and windows
Caribe Breeze				
1A, 2C, 5B, 6B, 10D, 11A, 15A, 16B, 17C, 20A, 20B, 21B, 25C, 25A, 28A, 31B, 34B, 35A, 37A, 38B, 39C, 43B, and 47A American Circle 92A Saratoga Road 1B and 4B Point Cruz	Two, Three, and Four Bedroom Duplex Units	1974	2001 - 2003	<ul style="list-style-type: none"> • Remove LBP and ACM • Repaint all walls inside and outside • Replace vinyl floor tile with ceramic tile • Replace A/C ductwork and central A/C units • Upgrade electrical systems • Replace entrance doors • Reconfigure outside storage areas and A/C mechanical rooms • Replace kitchen cabinets • Replace bathroom fixtures and tiles • Reconfigure master bedrooms and bathroom • Replace windows • Install ceiling fans Replace carpeting in upstairs of 2-bedroom units
Cascado Point				
6, 11, 16, 21, 24, 30, and 31 FDR Drive 6 Bataan Drive 5 and 14 San Jacinto Road 4, 7, and 13 Cowrens Drive 4, 5, 13, 14, 19, 26, 29, 30, and 43 Monterey Road 2, 5, 12, and 14 Cabot Lake	Two, Three and Four Bedroom Single Family Houses	1960	1998 - 2001	<ul style="list-style-type: none"> • Remove LBP and ACM • Construct screened-in porches • Repaint all walls inside and outside • Replace vinyl floor tile with ceramic tile • Replace A/C ductwork and central A/C units • Upgrade electrical systems • Replace kitchen cabinets • Remodel laundry areas • Replace bathroom fixtures and tiles • Reconfigure master bedrooms and bathroom • Install ceiling fans
Coast Guard				
1675, 1676, 1677, 1678, 1679, and 1680 Intrepid Street	Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> • Replace floors tiles • Replace kitchen cabinets • Install central A/C • Replace aluminum jealousy windows with French type glass louvered windows

Table A. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
FDR Drive				
1, 3, and 5 FDR Drive	Three Bedroom Single Family Houses	1960	1999 - 2000	<ul style="list-style-type: none"> • Remove LBP and ACM • Replace carpeting • Repaint all walls inside and outside • Replace A/C ductwork • Reconfigure mechanical room • Upgrade electrical systems • Replace kitchen floors and cabinets • Remodel bathrooms including replace bathroom fixtures (not 1 FDR) • Install ceiling fans
Manatee Bay				
6 and 7 Intrepid Street 8, 11, 20, 36, 38, 49, 52, and 60 Ranger Road 2 and 20 Hancock Circle 4 and 15 Coral Sea Drive 3 and 18 Franklin Drive 8, 19, and 26 Hornet Road 3, 11, 21, 32, and 35 Yoektown Circle 67, 74, and 81 Lexington Drive	Two, Three and Four Bedroom Single Family Houses	1960	2001 - 2003	<ul style="list-style-type: none"> • Remove LBP and ACM • Construct screened-in porches • Repaint all walls inside and outside • Replace vinyl floor tile with ceramic tile • Replace A/C ductwork and central A/C units • Upgrade electrical systems • Reconfigure kitchens and replace kitchen cabinets • Remodel laundry areas • Replace bathroom fixtures and tiles • Reconfigure master bedrooms and bathroom • Install ceiling fans
Mangrove Manor				
11, 12, 19, 20, 31, 38, 50, 68, and 82 Sarasota Road 2, 11, and 17 Essex Drive 6 Ticonderoga Street 18, 25, 34, 41, and 54 Enterprise Drive 9, 26, 33, 46, and 47 Lexington Drive 6, 15, and 32 Wasp Circle 7 Bunker Hill Road	Two, Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> • Same as Coast Guard
Rainbow Hill				
2A, 4A, 4B, 5B, 7A, 8A, 10C, 13B, 14B, 15B, 16A, 18A, 19C, 20B, 22B, 23A, 24A, 27A, 28B, 29B, 32A, 33B, 34A, and 36A Nimitz Drive	Two, Three, and Four Bedroom Duplex and Apartment-Style Units	1975	1998 - 2001	<ul style="list-style-type: none"> • Same as Caribe Breeze

Base Realignment and Closure (BRAC) policy considers ACM to be a hazard when it meets all three of the following conditions: friable, accessible, and damaged. ACM hazards were not identified in the housing units that were inspected. Per the Scope of Work, Baker did not conduct walk-through inspections of all units of NAPR housing to identify ACMs and ACM hazards. Therefore, additional ACMs and ACM hazards may be present in NAPR housing. Table B below summarizes the ACMs that were identified at each housing community. No ACMs were identified at Rainbow Hill.

Table B. ACMs Identified at NAPR Housing		
Material	Location	Approximate Percent of Units with ACMs*
Algodones		
Vinyl Floor Tile, 9" x 9" tan with brown streaks	LR/ DR, Hall 1, BR1, BR2, and BR3	47%
Floor Adhesive, under 9" x 9" tan with brown streaks vinyl floor tile	LR/ DR, Hall 1, BR1, BR2, and BR3	47%
Vinyl Floor Tile, 9" x 9" gray with black streaks	BR1 and BR2	42%
Floor Adhesive, under 9" x 9" gray with black streaks vinyl floor tile	BR1 and BR2	42%
Caribe Breeze		
Tan/Black Floor Adhesive, under 1' x 1' tan mottled vinyl floor tile	BR1, BR2, BR3, BR4, ST2, ST3, Hall 1, Hall 2, Stair, Laundry, Kitchen, LR/DR	43%
Yellow/Black Floor Adhesive, under 1' x 1' gray mottled vinyl floor tile	BR1, BR2, BR3, BR4, ST2, ST3, Hall 1, Hall 2, Stair, Laundry, Kitchen, LR/DR	57%
Cascajo Point		
Yellow/Black Floor Adhesive, under 1' x 1' tan mottled vinyl floor tile	BR1, BR2, BR3, BR4, LR, DR, LR-P, Hall, Laundry, and Kitchen	100%
Coast Guard		
Black Floor Adhesive, under 1' x 1' brown with white and red streaks vinyl floor tile	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	66%
FDR Drive		
Floor Adhesive, under 1' x 1' brown with red streaks vinyl floor tile	LR/DR	33%
Vinyl Floor Tile, 9" x 9" gray with white streaks	BR1, BR2, BR3, Hall, and LR/DR	66%
Floor Adhesive, under 9" x 9" gray with white streaks vinyl floor tile	BR1, BR2, BR3, Hall, and LR/DR	66%
Floor Adhesive, under 1' x 1' tan mottled vinyl floor tile	BR1, BR2, BR3, and Hall	33%
Vinyl Floor Tile, 1' x 1' brown with tan streaks	LR/DR	33%
Manatee Bay		
Vinyl Floor Tile, 1' x 1' yellow mottled	LR, DR, Kitchen, Hall, BR1, BR2, and BR3	3%
Black Floor Adhesive, under 1' x 1' yellow mottled and 1' x 1' brown with orange and white stripes vinyl floor tiles	LR, DR, Kitchen, Hall, BR1, BR2, and BR3	7%
Mangrove Manor		
Vinyl Floor Tile, 1' x 1' brown mottled	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	33%
Black Floor Adhesive, under 1' x 1' brown mottled, 1' x 1' white with brown streaks, 1' x 1' light brown mottled, 1' x 1' brown with light brown streaks, 1' x 1' brown with white streaks, 1' x 1' white with gray specks, and 1' x 1' white with black streaks vinyl floor tiles	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	88%
Vinyl Floor Tile, 1' x 1' brown with light brown streaks	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	4%
Vinyl Floor Tile, 1' x 1' white with black streaks	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	7%
Vinyl Floor Tile, 1' x 1' tan mottled	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	7%
Black Floor Adhesive, under 1' x 1' tan mottled and 1' x 1' white mottled vinyl floor tiles	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	11%
Vinyl Floor Tile, 1' x 1' white mottled	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	4%
Sink Coating, black	Kitchen	96%

*For NAPR Housing, percentages are based on a representative number of units inspected for ACM; not all units in NAPR Housing were inspected. A complete ACM inspection of all NAPR Housing units is recommended to verify actual quantities and conditions.

If renovation or demolition of housing units is scheduled, a more comprehensive ACM inspection should be conducted to attempt to identify hidden ACM (e.g., behind walls, above ceilings, etc.) that would not have been identified during this non-destructive, baseline study. Also, prior to renovation or demolition, ACM removal and disposal activities must be completed in accordance with EPA, Puerto Rico OSHA, Puerto Rico EQB, and other applicable federal and local regulations.

1.0 INTRODUCTION

The US Navy Engineering Field Activity Northeast (EFANE) contracted Baker to perform an asbestos-containing material (ACM) inspection of military family housing at Naval Activity Puerto Rico (NAPR), located near Cieba, Puerto Rico. The work was performed so that the federal government can transfer the properties. The Navy is considered the owner of all properties referenced in this report. The work was performed in accordance with the Scope of Work: Lead-Based Paint Inspection and Risk Assessment, and Asbestos Survey for Residential Property Transfer, dated September 9, 2004, under Contract Number N62472-01-D-1440. Field work for the project was performed from January 5, 2005 to February 11, 2005.

The body of the report is followed by the following appendices that contain supporting data:

- Appendix A contains copies of training certificates for the Baker and Environmental Development and Sustainability, Inc. (EDS) Baker subcontractor) staff who conducted the investigation and the certificates of accreditation for the laboratories that conducted sample analysis.
- Appendix B contains an NAPR map that shows the location of each of the housing communities and a floor plan for each type of housing unit that was inspected.
- Appendix C contains analytical laboratory reports for bulk material samples.
- Appendix D contains photographs pertinent to the ACM inspection. These photographs are also included on a CD that accompanies this report.

While preparing this report, Baker consulted the following regulations, guidance documents and policies:

- 29 CFR 1926.1101 - OSHA Asbestos Construction Standard
- 40 CFR 763 - Asbestos Hazard Emergency Response Act (AHERA) and Asbestos School Hazard Reauthorization Act (ASHARA) as Amended
- 40 CFR 61, Subpart M – National Emissions Standards for Hazardous Air Pollutants (NESHAPS)

- Puerto Rico Environmental Quality Board Regulation for the Control of Atmospheric Pollution, Rules 102, 422, and 501
- 41 CFR 101-47 – General Services Administration Federal Property Management Regulations: Utilization and Disposal of Real Property
- 15 United States Code 2680, 2681 and 2688 -Toxic Substances Control Act
- Department of Defense (DoD) Base Realignment and Closure Act (BRAC) Policy on Asbestos, Lead Paint and Radon Policies at BRAC Properties (October 31, 1994)
- EPA 560/5-85-030a – *Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials*

1.1 Housing Community Overview

NAPR housing was reportedly constructed between 1960 and 1975 and contains 962 two, three, and four-bedroom apartment style, duplex, and single-family units. NAPR housing consists of eight communities: Algodones, Caribe Breeze, Cascajo Point, Coast Guard, FDR Drive, Manatee Bay, Mangrove Manor, and Rainbow Hill. Twenty-seven of the housing units in Manatee Bay are of original construction, while the remaining 935 units were renovated beginning in 1989. The square footage of the units ranges from 1023 to 2105 square feet. The concrete-framed buildings have concrete or ceramic exterior finishes. Interior walls are painted gypsum board and concrete. The units are generally in good condition.

Table C below summarizes the renovation history for the communities, as provided by the housing office manager.

Table C. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Algodones				
889C, 889E, 889F, 889G, 889H, 891A, 891D, 893B, 893C, 895A, 895B, 895C, 897A, 897B, 897D, 897F, 897G, 897H, and 899B	Two, Three, and Four Bedroom Apartment-Style Units	1960	1991	<ul style="list-style-type: none"> • Installation of carpeting • Remodel bathrooms and kitchens • Replace doors and windows

Table C. Renovation History for NAPR Housing

Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Caribe Breeze				
1A, 2C, 5B, 6B, 10D, 11A, 15A, 16B, 17C, 20A, 20B, 21B, 25C, 25A, 28A, 31B, 34B, 35A, 37A, 38B, 39C, 43B, and 47A American Circle 92A Saratoga Road 1B and 4B Point Cruz	Two, Three, and Four Bedroom Duplex Units	1974	2001 - 2003	<ul style="list-style-type: none"> • Remove LBP and ACM • Repaint all walls inside and outside • Replace vinyl floor tile with ceramic tile • Replace A/C ductwork and central A/C units • Upgrade electrical systems • Replace entrance doors • Reconfigure outside storage areas and A/C mechanical rooms • Replace kitchen cabinets • Replace bathroom fixtures and tiles • Reconfigure master bedrooms and bathroom • Replace windows • Install ceiling fans Replace carpeting in upstairs of 2-bedroom units
Cascado Point				
6, 11, 16, 21, 24, 30, and 31 FDR Drive 6 Bataan Drive 5 and 14 San Jacinto Road 4, 7, and 13 Cowress Drive 4, 5, 13, 14, 19, 26, 29, 30, and 43 Monterey Road 2, 5, 12, and 14 Cabot Lake	Two, Three and Four Bedroom Single Family Houses	1960	1998 - 2001	<ul style="list-style-type: none"> • Remove LBP and ACM • Construct screened-in porches • Repaint all walls inside and outside • Replace vinyl floor tile with ceramic tile • Replace A/C ductwork and central A/C units • Upgrade electrical systems • Replace kitchen cabinets • Remodel laundry areas • Replace bathroom fixtures and tiles • Reconfigure master bedrooms and bathroom • Install ceiling fans
Coast Guard				
1675, 1676, 1677, 1678, 1679, and 1680 Intrepid Street	Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> • Replace floors tiles • Replace kitchen cabinets • Install central A/C • Replace aluminum jealousy windows with French type glass louvered windows
FDR Drive				
1, 3, and 5 FDR Drive	Three Bedroom Single Family Houses	1960	1999 - 2000	<ul style="list-style-type: none"> • Remove LBP and ACM • Replace carpeting • Repaint all walls inside and outside • Replace A/C ductwork • Reconfigure mechanical room • Upgrade electrical systems • Replace kitchen floors and cabinets • Remodel bathrooms including replace bathroom fixtures (not 1 FDR) • Install ceiling fans

Table C. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Manatee Bay				
6 and 7 Intrepid Street 8, 11, 20, 36, 38, 49, 52, and 60 Ranger Road 2 and 20 Hancock Circle 4 and 15 Coral Sea Drive 3 and 18 Franklin Drive 8, 19, and 26 Hornet Road 3, 11, 21, 32, and 35 Yorktown Circle 67, 74, and 81 Lexington Drive	Two, Three and Four Bedroom Single Family Houses	1960	2001 - 2003	<ul style="list-style-type: none"> • Remove LBP and ACM • Construct screened-in porches • Repaint all walls inside and outside • Replace vinyl floor tile with ceramic tile • Replace A/C ductwork and central A/C units • Upgrade electrical systems • Reconfigure kitchens and replace kitchen cabinets • Remodel laundry areas • Replace bathroom fixtures and tiles • Reconfigure master bedrooms and bathroom • Install ceiling fans
Mangrove Manor				
11, 12, 19, 20, 31, 38, 50, 68, and 82 Saratoga Road 2, 11, and 17 Essex Drive 6 Ticonderoga Street 18, 25, 34, 41, and 54 Enterprise Drive 9, 26, 33, 46, and 47 Lexington Drive 6, 15, and 32 Waap Circle 7 Bunker Hill Road	Two, Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> • Same as Coast Guard
Rainbow Hill				
2A, 4A, 4B, 5B, 7A, 8A, 10C, 13B, 14B, 15B, 16A, 18A, 19C, 20B, 22B, 23A, 24A, 27A, 28B, 29B, 32A, 33B, 34A, and 36A Nimitz Drive	Two, Three, and Four Bedroom Duplex and Apartment-Style Units	1975	1998 - 2001	<ul style="list-style-type: none"> • Same as Caribe Breeze

Floor plans of each type of housing unit are included in Appendix B, and exterior photographs are presented in Appendix D.

2.0 ASBESTOS-CONTAINING MATERIAL INSPECTION

2.1 Regulatory Background

In the 1970s and 1980s, the EPA banned the use of asbestos-containing spray-on materials, molded and wet applied asbestos, asbestos-containing thermal system insulation, and asbestos in acoustical or decorative applications. As of 1989, the EPA planned to ban the use of asbestos in other products. The ban was originally designed to be put into place in three phases; however, in 1991 the EPA ban was repealed. Because of the repeal, only the first stage of the ban was implemented. Products included in the first phase of the ban were felt products and asbestos cement products.

Several federal regulations pertain to managing ACMs. AHERA, 40 CFR 763 Subpart E, is perhaps the most well known asbestos regulation. The EPA developed AHERA to protect children in the United States from deteriorating ACMs in school buildings. AHERA was enacted in 1986 and required school systems to identify ACMs in all of their school buildings. AHERA also required school systems to develop management plans for the ACMs identified in schools and established reporting and record keeping requirements for educational authorities. Although AHERA is applicable only to schools, many of the accreditation requirements and sampling methodologies established by

the act have been incorporated into the asbestos inspection industry's procedures. ASHARA requires individuals working in public or commercial buildings to be AHERA accredited if they are performing ACM abatement projects, supervising ACM abatement projects, designing ACM abatement projects, or inspecting building for ACMs. The EPA NESHAPS requires inspections for ACM prior to renovation or demolition of structures, except for residential buildings with four or fewer dwelling units. NESHAPS contains work practice and disposal requirements for regulated ACM, which is defined as ACM that is friable or that is likely to become friable during renovation or demolition activities. The definition of a friable material is one that can be crushed, pulverized, or reduced to powder under hand pressure when dry. The definition of a non-friable material is one that cannot be crushed, pulverized, or reduced to powder under hand pressure when dry.

The Puerto Rico Environmental Quality Board (EQB) regulates ACM inspection, management, removal, and disposal activities. The majority of the regulations are found in the EQB's Regulation for the Control of Atmospheric Pollution Rules 102, 422, and 501. The rules require permits, notifications, training, and work plan submissions to EQB, among other items.

OSHA developed the Occupational Exposure to Asbestos regulation to help protect workers from asbestos hazards. The regulation defined Class I through IV asbestos work, established asbestos exposure limits, and implemented asbestos worker protection requirements. Unlike the EPA's regulations, the OSHA regulation was specifically written to protect workers rather than the public. The Puerto Rico Occupational Safety and Health Administration has adopted the federal standard.

Baker reviewed the Federal Property Management Regulations 41 CFR 101-47.304-13 and BRAC policy to identify regulations and guidelines for transferring properties with ACMs. Based on the review of the information, the Navy is required to disclose all knowledge of ACMs at NAPR Housing to any bidders or transferees. This report should be given to parties interested in NAPR Housing and will serve as the disclosure vehicle. As stated in the Federal Property Management Regulations, any bidders on NAPR Housing should be provided with a "Notice of the Presence of Asbestos—Warning!". The notice can be found in 41 CFR 101-47.304-13.

2.2 Methodology

Baker was unable to obtain any previous ACM reports for the housing communities. It is not known if previous ACM surveys were conducted.

Baker conducted the asbestos inspection in accordance with AHERA, ASHARA and OSHA asbestos regulations. AHERA-accredited asbestos inspectors identified building materials that could contain asbestos. Building materials were then grouped into homogeneous materials. Homogeneous materials are defined as building materials similar in appearance and texture. The asbestos inspectors then collected representative bulk material samples from each homogeneous material in general accordance with AHERA guidelines. Insulation materials that appeared to be composed of fiberglass were not considered potential (i.e., suspect) ACM. For each homogeneous material, the material description, location(s), approximate quantity, friability, condition, accessibility, and potential for damage were recorded.

In accordance with the Scope of Work, the number of samples for each homogeneous material was based on the quantity of homogeneous material present throughout the inspected housing units, as follows:

- \leq 1000 square feet – 3 samples
- \leq 5000 square feet – 5 samples
- $>$ 5000 square feet – 7 samples

Sample results from a homogeneous material represent the asbestos content for the homogeneous material throughout each particular housing community, regardless of the sample locations.

As per the scope of work, Baker sampled wallboard and associated joint compound as a composite material. The results are reported for individual layers as well as for the composite material.

Bulk building material samples were sent to Schneider Labs for analysis using polarized light microscopy with dispersion staining. Schneider Labs is accredited for asbestos analysis through the National Voluntary Laboratory Accreditation Program (NVLAP). Homogeneous materials were analyzed until a positive identification of asbestos was made or until all samples of the material were determined to contain less than or equal to 1 percent asbestos. Samples found to contain detectable, but less than 1 percent asbestos, were further analyzed by point count methodology to more accurately define their asbestos content. Quality Control (QC) samples, one per 10 bulk samples, were collected in accordance with the Scope of Work and were analyzed by RJ Lee Group, Inc., another NVLAP accredited laboratory. QC sample results were generally consistent with bulk sample results. However, where conflicting lab results were indicated (i.e., one lab found the material to contain greater than 1 percent asbestos and the other did not), the material was considered to be ACM. Laboratory reports are included in Appendix C. Inspector and laboratory certifications are included in Appendix A.

2.3 Selecting Units for Inspections

Per the Scope of Work, ACM inspections were performed in 19 of 32 Algodones housing units, 26 of 136 Caribe Breeze housing units, 26 of 139 Cascajo Point housing units, all six Coast Guard housing units, all three FDR Drive housing units, 26 of 262 Manatee Bay housing units, 27 of 275 Mangrove Manor housing units, and 24 of 88 Rainbow Hill housing units. NAPR Housing units selected for ACM inspection were chosen randomly. Units selected for ACM inspection are listed in Table D below. All units were vacant at the time of the inspections.

Table D. Units Selected for ACM Inspection at NAPR Housing

Address	Date Inspected
Algodones	
889C	February 1, 2005
889E	February 1, 2005
889F	February 2, 2005
889G	February 2, 2005
889H	February 7, 2005
891A	February 3, 2005
891D	February 3, 2005
893B	February 3, 2005
893C	February 4, 2005
895A	February 4, 2005
895B	February 4, 2005
895C	February 4, 2005
897A	February 7, 2005
897B	February 2, 2005
897D	February 2, 2005
897F	February 2, 2005
897G	February 2, 2005
897H	February 2, 2005
899B	February 1, 2005
Caribe Breeze	
1A American Circle	January 5, 2005
2C American Circle	January 9, 2005
5B American Circle	January 7, 2005
6B American Circle	January 7, 2005
10D American Circle	January 10, 2005
11A American Circle	January 10, 2005
15A American Circle	January 10, 2005
16B American Circle	January 10, 2005
17C American Circle	January 11, 2005
20A American Circle	January 11, 2005
20B American Circle	January 11, 2005
21B American Circle	January 12, 2005
24C American Circle	January 12, 2005
25A American Circle	January 12, 2005
28A American Circle	January 12, 2005
31B American Circle	January 12, 2005
34B American Circle	January 13, 2005
35A American Circle	January 13, 2005
37A American Circle	January 13, 2005
38B American Circle	January 14, 2005
39C American Circle	January 14, 2005

Table D. Units Selected for ACM Inspection at NAPR Housing

Address	Date Inspected
Caribe Breeze	
43B American Circle	January 14, 2005
47A American Circle	January 17, 2005
1B Point Cruz	January 17, 2005
4B Point Cruz	January 17, 2005
92A Saratoga Drive	January 17, 2005
Cascade Point	
6 Bataan Drive	January 20, 2005
4 Cowrens Drive	January 21, 2005
7 Cowrens Drive	January 24, 2005
13 Cowrens Drive	January 24, 2005
6 FDR Drive	January 20, 2005
11 FDR Drive	January 20, 2005
16 FDR Drive	January 20, 2005
21 FDR Drive	January 20, 2005
24 FDR Drive	January 20, 2005
30 FDR Drive	January 21, 2005
31 FDR Drive	January 21, 2005
4 Monterey Road	January 26, 2005
5 Monterey Road	January 26, 2005
13 Monterey Road	January 26, 2005
14 Monterey Road	January 27, 2005
19 Monterey Road	January 27, 2005
26 Monterey Road	January 27, 2005
29 Monterey Road	January 27, 2005
30 Monterey Road	January 27, 2005
43 Monterey Road	January 27, 2005
5 San Jacinto Road	January 27, 2005
14 San Jacinto Road	January 25, 2005
Coast Guard	
1675 Intrepid Street	January 31, 2005
1676 Intrepid Street	January 31, 2005
1677 Intrepid Street	February 1, 2005
1678 Intrepid Street	February 5, 2005
1679 Intrepid Street	February 5, 2005
1680 Intrepid Street	January 31, 2005
FDR Drive	
1 FDR Drive	January 19, 2005
3 FDR Drive	January 21, 2005
5 FDR Drive	January 19, 2005
Manatee Bay	
4 Coral Sea Drive	January 12, 2005
15 Coral Sea Drive	January 12, 2005
3 Franklyn Drive	January 12, 2005
18 Franklyn Drive	January 12, 2005
2 Hancock Circle	January 11, 2005
20 Hancock Circle	January 11, 2005

Table D. Units Selected for ACM Inspection at NAPR Housing	
Address	Date Inspected
Manatee Bay	
8 Hornet Road	January 13, 2005
19 Hornet Road	January 13, 2005
26 Hornet Road	January 13, 2005
6 Intrepid Street	January 6, 2005
7 Intrepid Street	January 7, 2005
67 Lexington Drive	January 18, 2005
74 Lexington Drive	January 18, 2005
81 Lexington Drive	January 18, 2005
8 Ranger Road	January 7, 2005
11 Ranger Road	January 7, 2005
20 Ranger Road	January 10 2005
36 Ranger Road	January 11, 2005
38 Ranger Road	January 10, 2005
49 Ranger Road	January 10, 2005
52 Ranger Road	January 10, 2005
60 Ranger Road	January 11, 2005
3 Yorktown Circle	January 14, 2005
11 Yorktown Circle	January 14, 2005
21 Yorktown Circle	January 14, 2005
32 Yorktown Circle	January 14, 2005
35 Yorktown Circle	January 17, 2005
Mangrove Manor	
7 Bunker Hill Road	January 27, 2005
18 Enterprise Drive	January 24, 2005
25 Enterprise Drive	January 24, 2005
34 Enterprise Drive	January 24, 2005
41 Enterprise Drive	January 25, 2005
54 Enterprise Drive	January 25, 2005
2 Essex Drive	January 21, 2005
11 Essex Drive	January 21, 2005
17 Essex Drive	January 21, 2005
9 Lexington Drive	January 25, 2005
26 Lexington Drive	January 26, 2005
33 Lexington Drive	January 26, 2005
46 Lexington Drive	January 26, 2005
47 Lexington Drive	January 26, 2005
6 Ticonderoga Road	January 24, 2005
11 Saratoga Road	January 19, 2005
12 Saratoga Road	January 19, 2005
19 Saratoga Road	January 19, 2005
20 Saratoga Road	January 19, 2005
31 Saratoga Road	January 20, 2005
38 Saratoga Road	January 20, 2005
50 Saratoga Road	January 20, 2005
68 Saratoga Road	January 20, 2005

Table D. Units Selected for ACM Inspection at NAPR Housing	
Address	Date Inspected
Mangrove Manor	
82 Saratoga Road	January 21, 2005
6 Wasp Circle	January 26, 2005
15 Wasp Circle	January 27, 2005
32 Wasp Circle	January 27, 2005
Rainbow Hill	
2A Nimitz Drive	January 27, 2005
4A Nimitz Drive	January 28, 2005
4B Nimitz Drive	January 28, 2005
5B Nimitz Drive	January 28, 2005
7A Nimitz Drive	January 28, 2005
8A Nimitz Drive	January 28, 2005
10C Nimitz Drive	January 31, 2005
13B Nimitz Drive	January 31, 2005
14B Nimitz Drive	January 31, 2005
15B Nimitz Drive	January 31, 2005
16A Nimitz Drive	February 1, 2005
18A Nimitz Drive	February 1, 2005
19C Nimitz Drive	February 1, 2005
20B Nimitz Drive	February 1, 2005
22B Nimitz Drive	February 2, 2005
23A Nimitz Drive	February 2, 2005
24A Nimitz Drive	February 2, 2005
27A Nimitz Drive	February 2, 2005
28B Nimitz Drive	February 3, 2005
29B Nimitz Drive	February 3, 2005
32A Nimitz Drive	February 3, 2005
33B Nimitz Drive	February 3, 2005
34A Nimitz Drive	February 4, 2005
36A Nimitz Drive	February 4, 2005

2.4 Disclaimer

Baker was contracted to perform an ACM inspection of NAPR Housing that would meet the requirements of an Operations and Maintenance Program for ACMs. As such, the inspection was not destructive and did not involve breaking into pipe chases, interstitial spaces or other inaccessible building areas. Therefore, ACMs may exist within inaccessible building areas. The presence or absence of ACMs applies only to materials sampled on the dates of the field visit. It should be noted that conditions might change due to vandalism, deterioration, or maintenance activities. Ongoing monitoring by the owner or transferee is necessary. If additional materials suspected of containing

asbestos are identified during renovation or demolition activities, they should be assumed to be ACMs or should be sampled and analyzed before being disturbed.

2.5 Summary of Asbestos-Containing Materials

By definition, an ACM contains greater than 1 percent asbestos. Table E below lists the ACMs identified within NAPR Housing by community. Note that additional ACMs may be present in the communities. ACMs were not identified in Rainbow Hill. Floor plans of typical units are presented in Appendix B. For a complete listing of the materials tested for asbestos, refer to Table 1 (for each housing community) following the text of this report.

Table E. ACMs Identified at NAPR Housing		
Material	Location	Approximate Percent of Units with ACMs*
Algodones		
Vinyl Floor Tile, 9" x 9" tan with brown streaks	LR/ DR, Hall 1, BR1, BR2, and BR3	47%
Floor Adhesive, under 9" x 9" tan with brown streaks vinyl floor tile	LR/ DR, Hall 1, BR1, BR2, and BR3	47%
Vinyl Floor Tile, 9" x 9" gray with black streaks	BR1 and BR2	42%
Floor Adhesive, under 9" x 9" gray with black streaks vinyl floor tile	BR1 and BR2	42%
Caribe Breeze		
Tan/Black Floor Adhesive, under 1' x 1' tan mottled vinyl floor tile	BR1, BR2, BR3, BR4, ST2, ST3, Hall 1, Hall 2, Stair, Laundry, Kitchen, LR/DR	43%
Yellow/Black Floor Adhesive, under 1' x 1' gray mottled vinyl floor tile	BR1, BR2, BR3, BR4, ST2, ST3, Hall 1, Hall 2, Stair, Laundry, Kitchen, LR/DR	57%
Cascajo Point		
Yellow/Black Floor Adhesive, under 1' x 1' tan mottled vinyl floor tile	BR1, BR2, BR3, BR4, LR, DR, LR-P, Hall, Laundry, and Kitchen	100%
Coast Guard		
Black Floor Adhesive, under 1' x 1' brown with white and red streaks vinyl floor tile	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	66%
FDR Drive		
Floor Adhesive, under 1' x 1' brown with red streaks vinyl floor tile	LR/DR	33%
Vinyl Floor Tile, 9" x 9" gray with white streaks	BR1, BR2, BR3, Hall, and LR/DR	66%
Floor Adhesive, under 9" x 9" gray with white streaks vinyl floor tile	BR1, BR2, BR3, Hall, and LR/DR	66%
Floor Adhesive, under 1' x 1' tan mottled vinyl floor tile	BR1, BR2, BR3, and Hall	33%
Vinyl Floor Tile, 1' x 1' brown with tan streaks	LR/DR	33%

Table E. ACMs Identified at NAPR Housing		
Material	Location	Approximate Percent of Units with ACMs*
Manatee Bay		
Vinyl Floor Tile, 1' x 1' yellow mottled	LR, DR, Kitchen, Hall, BR1, BR2, and BR3	3%
Black Floor Adhesive, under 1' x 1' yellow mottled and 1' x 1' brown with orange and white stripes vinyl floor tiles	LR, DR, Kitchen, Hall, BR1, BR2, and BR3	7%
Mangrove Manor		
Vinyl Floor Tile, 1' x 1' brown mottled	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	33%
Black Floor Adhesive, under 1' x 1' brown mottled, 1' x 1' white with brown streaks, 1' x 1' light brown mottled, 1' x 1' brown with light brown streaks, 1' x 1' brown with white streaks, 1' x 1' white with gray specks, and 1' x 1' white with black streaks vinyl floor tiles	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	88%
Mangrove Manor		
Vinyl Floor Tile, 1' x 1' brown with light brown streaks	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	4%
Vinyl Floor Tile, 1' x 1' white with black streaks	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	7%
Vinyl Floor Tile, 1' x 1' tan mottled	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	7%
Black Floor Adhesive, under 1' x 1' tan mottled and 1' x 1' white mottled vinyl floor tiles	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	11%
Vinyl Floor Tile, 1' x 1' white mottled	LR, DR, Kitchen, Hall, BR1, BR2, BR3, and BR4	4%
Sink Coating, black	Kitchen	96%

Table 2 (for each housing community) following the text of this report provides additional details on the ACMs that were identified, including asbestos content, friability, and total quantities for the housing units that were inspected. Tables F through L, following Table E, list the ACMs identified by housing unit address. Appendix D contains photographs of the identified ACMs. A CD that includes these photographs accompanies this report.

Table F. ACMs Identified by Address for Algodones

Unit	Material	Material No.	Comment	Condition
889C Algodones	Vinyl Floor Tile (9" X 9" Tan With Brown Streaks)	006	The Adhesive For This Material Is Material #007.	Undamaged
	Floor Adhesive (Black, Under 9" X 9" Tan With Brown Streaks Vinyl Floor Tile)	007	This Is The Adhesive For Material #006.	Undamaged
889G Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	Vinyl Floor Tile (9" X 9" Gray With Black Streaks)	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	Floor Adhesive (Black, Under 9" X 9" Gray With Black Streaks Vinyl Floor Tile)	011	This Is The Adhesive For Material #010.	Undamaged
889H Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	See Initial Entry for Material #010	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	See Initial Entry for Material #011	011	This Is The Adhesive For Material #010.	Undamaged
891D Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	See Initial Entry for Material #010	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	See Initial Entry for Material #011	011	This Is The Adhesive For Material #010.	Undamaged
893C Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	See Initial Entry for Material #010	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	See Initial Entry for Material #011	011	This Is The Adhesive For Material #010.	Undamaged
895C Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	See Initial Entry for Material #010	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	See Initial Entry for Material #011	011	This Is The Adhesive For Material #010.	Undamaged
897D Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
897D Algodones	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	See Initial Entry for Material #010	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	See Initial Entry for Material #011	011	This Is The Adhesive For Material #010.	Undamaged
897G Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	See Initial Entry for Material #010	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	See Initial Entry for Material #011	011	This Is The Adhesive For Material #010.	Undamaged
897H Algodones	See Initial Entry for Material #006	006	The Adhesive For This Material Is Material #007.	Undamaged
	See Initial Entry for Material #007	007	This Is The Adhesive For Material #006.	Undamaged
	See Initial Entry for Material #010	010	The Adhesive For This Material Is Material #010. This Material Is Located Below The Existing Carpet.	Undamaged
	See Initial Entry for Material #011	011	This Is The Adhesive For Material #010.	Undamaged

Table G. ACMs Identified by Address for Caribe Breeze

Unit	Material	Material No.	Comment	Condition
10D American Circle	Floor Adhesive (Yellow With Black Residual, Under 1' X 1' Gray Mottled Vinyl Floor Tile)	008	This Is The Adhesive For Material #007.	Undamaged
11A American Circle	Floor Adhesive (Tan With Black Residual, Under 1' X 1' Tan Mottled Vinyl Floor Tile)	002	This Is The Adhesive For Material #001.	Undamaged
15A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
16B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
17C American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
1A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
1B Point Cruz	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
20A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
20B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
21B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
24C American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
25A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
28A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
2C American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
31B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
34B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
35A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
37A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
38B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
39C American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
43B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
47A American Circle	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
4B Point Cruz	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged
5B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
6B American Circle	See Initial Entry for Material #008.	008	This Is The Adhesive For Material #007.	Undamaged
92A Saratoga Road	See Initial Entry for Material #002.	002	This Is The Adhesive For Material #001.	Undamaged

Table H. ACMs Identified by Address for Cascajo Point

Unit	Material	Material No.	Equipment	Condition
11 FDR Drive	Floor Adhesive (Yellow With Black Residual, Under Tan 1' X 1' Mottled Vinyl Floor Tile)	003	This Is The Adhesive For Material #002.	Undamaged
12 Cabot Lake	See Initial Entry for Material #003	003		Undamaged
13 Cowrens Drive	See Initial Entry for Material #003	003		Undamaged
13 Monterey Road	See Initial Entry for Material #003	003		Undamaged
14 Cabot Lake	See Initial Entry for Material #003	003		Undamaged
14 Monterey Road	See Initial Entry for Material #003	003		Undamaged
14 San Jacinto Road	See Initial Entry for Material #003	003		Undamaged
16 FDR Drive	See Initial Entry for Material #003	003		Undamaged
19 Monterey Road	See Initial Entry for Material #003	003		Undamaged
2 Cabot Lake	See Initial Entry for Material #003	003		Undamaged
21 FDR Drive	See Initial Entry for Material #003	003		Undamaged
26 Monterey Road	See Initial Entry for Material #003	003		Undamaged
29 Monterey Road	See Initial Entry for Material #003	003		Undamaged
30 FDR Drive	See Initial Entry for Material #003	003		Undamaged
30 Monterey Road	See Initial Entry for Material #003	003		Undamaged
31 FDR Drive	See Initial Entry for Material #003	003		Undamaged
4 Cowrens Drive	See Initial Entry for Material #003	003		Undamaged
4 Monterey Road	See Initial Entry for Material #003	003		Undamaged
43 Monterey Road	See Initial Entry for Material #003	003		Undamaged
5 Cabot Lake	See Initial Entry for Material #003	003		Undamaged
5 Monterey Road	See Initial Entry for Material #003	003		Undamaged
5 San Jacinto Road	See Initial Entry for Material #003	003		Undamaged
6 Bataan Drive	See Initial Entry for Material #003	003		Undamaged
6 FDR Drive	See Initial Entry for Material #003	003		Undamaged
7 Cowrens Drive	See Initial Entry for Material #003	003		Undamaged

Table 1. ACMs Identified by Address for Coast Guard

Unit	Material	Material No.	Comments	Condition
1675 Intrepid Street	Floor Adhesive (Black, Under 1' X 1' Brown With White And Red Streaks Vinyl Floor Tile)	007	This Is The Adhesive For Material #006.	Undamaged
1677 Intrepid Street	See Initial Entry for Material #007	007		Undamaged
1678 Intrepid Street	See Initial Entry for Material #007	007		Undamaged
1679 Intrepid Street	See Initial Entry for Material #007	007		Undamaged

Table J. ACMs Identified by Address for FDR Drive

Unit	Material	Material No.	Comment	Condition
1 FDR Drive	Vinyl Floor Tile (9" X 9" Gray With White Streaks)	006	The Adhesive For This Material Is Material #007. This Material Is Located Below The Existing Carpet.	Undamaged
	Floor Adhesive (Black, Under 9" X 9" Gray With White Streaks Vinyl Floor Tile)	007	This Is The Adhesive For Material #006.	Undamaged
3 FDR Drive	Floor Adhesive (Black, Under 1' X 1' Tan Mottled Vinyl Floor Tile)	009	This Is The Adhesive For Material #007.	Undamaged
	Vinyl Floor Tile (1' X 1' Brown With Tan Streaks)	011	The Adhesive For This Material Is Material #012. This Material Is Located Below The Existing Carpet.	Undamaged
5 FDR Drive	Floor Adhesive (Black, Under 1' X 1' Brown With Red Streaks Vinyl Floor Tile)	005	This Is The Adhesive For Material #004.	Undamaged
	Vinyl Floor Tile (9" X 9" Gray With White Streaks)	006	The Adhesive For This Material Is Material #007. This Material Is Located Below The Existing Carpet.	Undamaged
	Floor Adhesive (Black, Under 9" X 9" Gray With White Streaks Vinyl Floor Tile)	007	This Is The Adhesive For Material #006.	Undamaged

Table K. ACMs Identified by Address for Manatee Bay

Unit	Material	Material No.	Comment	Condition
6 Intrepid Street	Vinyl Floor Tile (1' X 1' Yellow Mottled)	001	The Adhesive For This Material Is Material #002.	Damaged
	Floor Adhesive (Black, Under 1' X 1' Yellow Mottled And 1' X 1' Brown With White And Orange Stripes Vinyl Floor Tile)	002	This Is The Adhesive For Materials #001 And #005.	Damaged
7 Intrepid Street	Floor Adhesive (Black, Under 1' X 1' Yellow Mottled And 1' X 1' Brown With White And Orange Stripes Vinyl Floor Tile)	002	This Is The Adhesive For Materials #001 And #005.	Damaged

Table I. ACMs Identified by Address for Mangrove Manor

Unit	Material	Material No.	Comment	Condition
11 Essex Drive	Floor Adhesive (Black, Under 1' X 1' Brown Mottled, 1' X 1' White With Brown Streaks, 1' X 1' White With Black Streaks, 1' X 1' White With Gray Specks, 1' X 1' Brown With Light Brown Streaks, 1' X 1' Brown With White Streaks, And 1' X 1' Light Brown Mottled Vinyl Floor Tiles)	002	This Is The Adhesive For Materials #001, #005, #006, #007, #008, #009, And #010.	Undamaged
	Sink Coating (Black)	004		Undamaged
11 Saratoga Road	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
12 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
15 Wasp Drive	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
17 Essex Drive	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
18 Enterprise Drive	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
19 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
	Vinyl Floor Tile (1' X 1' Brown With Light Brown Streaks)	007	The Adhesive For This Material Is Material #002.	Undamaged
2 Essex Drive	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
20 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
25 Enterprise Drive	Sink Coating (Black)	004		Undamaged
	Vinyl Floor Tile (1' X 1' Tan Mottled)	011	The Adhesive For This Material Is Material #012.	Damaged
	Floor Adhesive (Black, Under 1' X 1' Tan Mottled And 1' X 1' White Mottled Vinyl Floor Tile)	012	This Is The Adhesive For Material #011.	Damaged
26 Lexington Drive	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
31 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
32 Wasp Drive	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged

Table L. ACMs Identified by Address for Mangrove Manor

Unit	Material	Material No.	Comments	Condition
33 Lexington Drive	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
34 Enterprise Drive	Sink Coating (Black)	004		Undamaged
	Floor Adhesive (Black, Under 1' X 1' Tan Mottled And 1' X 1' White Mottled Vinyl Floor Tile)	012	This Is The Adhesive For Material #011.	Damaged
	Vinyl Floor Tile (1' X 1' White Mottled)	013	The Adhesive For This Material Is Material #012.	Damaged
38 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
41 Enterprise Drive	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
46 Lexington Drive	Sink Coating (Black)	004		Undamaged
	Vinyl Floor Tile (1' X 1' Tan Mottled)	011	The Adhesive For This Material Is Material #012.	Damaged
	Floor Adhesive (Black, Under 1' X 1' Tan Mottled And 1' X 1' White Mottled Vinyl Floor Tile)	012	This Is The Adhesive For Material #011.	Damaged
47 Lexington Drive	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
50 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
54 Enterprise Drive	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
6 Ticonderoga Street	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
6 Wasp Drive	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
	Vinyl Floor Tile (1' X 1' White With Black Streaks)	010	The Adhesive For This Material Is Material #002.	Undamaged
68 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
7 Bunker Hill Road	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
82 Saratoga Road	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged
	Vinyl Floor Tile (1' X 1' White With Black Streaks)	010	The Adhesive For This Material Is Material #002.	Undamaged
9 Lexington Drive	Vinyl Floor Tile (1' X 1' Brown Mottled)	001	The Adhesive For This Material Is Material #002.	Undamaged
	See Initial Entry for Material #002	002		Undamaged
	Sink Coating (Black)	004		Undamaged

2.6 Summary of Hazards

Base Realignment and Closure (BRAC) policy considers an ACM to be a hazard when it meets all three of the following conditions: friable, accessible, and damaged. No ACM hazards were identified in the 158 NAPR Housing units that were inspected. Per the Scope of Work, Baker did not conduct walk-through inspections of all NAPR Housing units to identify ACMs and ACM hazards. Therefore, additional ACMs and ACM hazards may be present at NAPR Housing.

If renovation or demolition of housing units is scheduled, a more comprehensive ACM inspection should be conducted to attempt to identify hidden ACM (e.g., behind walls, above ceilings, etc.) that would not have been identified during this non-destructive, baseline study. Also, prior to renovation or demolition, ACM removal and disposal activities must be completed in accordance with EPA, Puerto Rico OSHA, Puerto Rico EQB, and other applicable federal and local regulations.

Final
Asbestos Inspection Report
for
Naval Activity Puerto Rico
Ceiba, Puerto Rico
Volume 1 of 7
(Text and Appendices A through D)

Contract N62472-01-D-1440 • Project Number 14 • June 2005



Prepared by
Michael Baker Jr., Inc.

Baker

ChallengeUs.

Under Contract with
Department of the Navy
Naval Facilities Engineering Command
Engineering Field Activity, Northeast



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EXECUTIVE SUMMARY

The US Navy Engineering Field Activity Northeast (EFANE) contracted Baker to perform an asbestos-containing material (ACM) inspection of 546 buildings at Naval Activity Puerto Rico (NAPR), located near Ceiba, Puerto Rico. An inspection of military family housing at NAPR was conducted simultaneously and is documented in a companion Baker report, Asbestos Inspection Report, Military Family Housing, for Naval Activity Puerto Rico, dated June 2005. The work was performed so that the federal government can transfer the properties. The Navy is considered the owner of all properties referenced in this report. The work was performed in accordance with the Scope of Work: Asbestos Survey, Naval Activity Puerto Rico, dated September 9, 2004, under Contract Number N62472-01-D-1440. Field work for the project was performed from December 1, 2004 to February 15, 2005.

The years of construction for the buildings at NAPR were not readily available. The buildings were predominantly vacant at the time of the inspections, and had served various purposes, including, but not limited to, dormitory-style housing, offices, and warehouses. The construction of the buildings varied widely, and sizes ranged from approximately 35 square feet to 131,000 square feet. The condition of the buildings ranged from poor to good.

Baker and NAPR staff were unable to locate 14 of the buildings, and three could not be accessed due to lack of keys, impassable access roads, or safety issues. In addition, 13 buildings had been removed according to NAPR staff and/or observation. Six buildings were inspected as a part of the simultaneously conducted housing inspections. A summary of this information is presented in Table B in Section 2.2.

A total of 2,006 homogeneous materials were identified during this investigation. Of those, 317 were found by laboratory analysis to be ACM, and five were assumed to be ACM due to access or safety issues that precluded sampling. The ACMs that were identified are presented in the building-specific sections of the report, which are included in Appendix E.

Base Realignment and Closure (BRAC) policy considers ACM to be a hazard when it meets all three of the following conditions: friable, accessible, and damaged. Several ACM hazards were identified in the buildings. Table A below summarizes those hazards.

Table A. ACM Hazards Identified		
Building Number	Material	Quantity
31	Pipe Insulation	2 lf
296	Pipe Insulation	20 lf
426	Duct Insulation	34 sf
598	Pipe Insulation	6 lf
1686	Pipe and Fitting Insulation	1 lf

Recommendations include the following: 1) The ACM hazards identified should be remedied prior to transfer of the properties. 2) The information on the presence and location of all ACMs should be communicated to the property transferee. 3) If renovation or demolition of buildings is scheduled, a more comprehensive ACM inspection should be conducted to attempt to identify hidden ACM (e.g., behind walls, above ceilings, etc.) that would not have been identified during this non-destructive, baseline study. Also, prior to renovation or demolition, ACM removal and disposal activities must be completed in accordance with EPA, Puerto Rico OSHA, Puerto Rico EQB, and other applicable federal and local regulations.

1.0 INTRODUCTION

The US Navy Engineering Field Activity Northeast (EFANE) contracted Baker to perform an asbestos-containing material (ACM) inspection of 546 buildings at Naval Activity Puerto Rico (NAPR), located near Ceiba, Puerto Rico. An inspection of military family housing at NAPR was conducted simultaneously and is documented in a companion Baker report, Asbestos Inspection Report, Military Family Housing, for Naval Activity Puerto Rico, dated June 2005. The work was performed so that the federal government can transfer the properties. The Navy is considered the owner of all properties referenced in this report. The work was performed in accordance with the Scope of Work: Asbestos Survey, Naval Activity Puerto Rico, dated September 9, 2004, under Contract Number N62472-01-D-1440. Field work for the project was performed from December 1, 2004 to February 11, 2005.

The body of the report is followed by the following appendices that contain supporting data:

- Appendix A contains copies of training certificates for the Baker and Environmental Development and Sustainability, Inc. (EDS, Baker subcontractor) staff who conducted the investigation and the certificates of accreditation for the laboratories that conducted sample analysis.
- Appendix B contains an NAPR map that shows building locations
- Appendix C contains a list of the buildings that were included in the scope of work
- Appendix D contains the analytical laboratory results for the quality control (QC) samples that were collected

Appendix E of this report contain building-specific summaries. These sections include a brief description of the number/type of suspect materials and ACM identified, summary tables of identified homogeneous materials and ACMs, photographs, sample location / ACM location drawings, and analytical laboratory reports.

All of the photographs that are presented in this report are included on a CD that accompanies this report. In addition, all ACM data presented in this report is included in three excel files on a CD that accompanies this report.

While preparing this report, Baker consulted the following regulations, guidance documents and

policies:

- 29 CFR 1926.1101 - OSHA Asbestos Construction Standard
- 40 CFR 763 - Asbestos Hazard Emergency Response Act (AHERA) and Asbestos School Hazard Reauthorization Act (ASHARA) as Amended
- Puerto Rico Environmental Quality Board Regulation for the Control of Atmospheric Pollution, Rules 102, 422, and 501
- 41 CFR 101-47 – General Services Administration Federal Property Management Regulations: Utilization and Disposal of Real Property
- 15 United States Code 2680, 2681 and 2688 -Toxic Substances Control Act
- Department of Defense (DoD) Base Realignment and Closure Act (BRAC) Policy on Asbestos, Lead Paint and Radon Policies at BRAC Properties (October 31, 1994)
- EPA 560/5-85-030a – *Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials*

1.1 Buildings Overview

The years of construction for the buildings at NAPR were not readily available. The buildings were predominantly vacant at the time of the inspections, and had served various purposes, including, but not limited to, dormitory-style housing, offices, and warehouses. The construction of the buildings varied widely, and sizes ranged from approximately 35 square feet to 131,000 square feet. The condition of the buildings ranged from poor to good.

2.0 ASBESTOS-CONTAINING MATERIAL INSPECTION

2.1 Regulatory Background

In the 1970s and 1980s, the EPA banned the use of asbestos-containing spray-on materials, molded and wet applied asbestos, asbestos-containing thermal system insulation, and asbestos in acoustical or decorative applications. As of 1989, the EPA planned to ban the use of asbestos in other products. The

ban was originally designed to be put into place in three phases; however, in 1991 the EPA ban was repealed. Because of the repeal, only the first stage of the ban was implemented. Products included in the first phase of the ban were felt products and asbestos cement products.

Several federal regulations pertain to managing ACMs. AHERA, 40 CFR 763 Subpart E, is perhaps the most well known asbestos regulation. The EPA developed AHERA to protect children in the United States from deteriorating ACMs in school buildings. AHERA was enacted in 1986 and required school systems to identify ACMs in all of their school buildings. AHERA also required school systems to develop management plans for the ACMs identified in schools and established reporting and record keeping requirements for educational authorities. Although AHERA is applicable only to schools, many of the accreditation requirements and sampling methodologies established by the act have been incorporated into the asbestos inspection industry's procedures. ASHARA requires individuals working in public or commercial buildings to be AHERA accredited if they are performing ACM abatement projects, supervising ACM abatement projects, designing ACM abatement projects, or inspecting building for ACMs. The EPA NESHAPS requires inspections for ACM prior to renovation or demolition of structures, except for residential buildings with four or fewer dwelling units. NESHAPS contains work practice and disposal requirements for regulated ACM, which is defined as ACM that is friable or that is likely to become friable during renovation or demolition activities. The definition of a friable material is one that can be crushed, pulverized, or reduced to powder under hand pressure when dry. The definition of a non-friable material is one that cannot be crushed, pulverized, or reduced to powder under hand pressure when dry.

The Puerto Rico Environmental Quality Board (EQB) regulates ACM inspection, management, removal, and disposal activities. The majority of the regulations are found in the EQB's Regulation for the Control of Atmospheric Pollution Rules 102, 422, and 501. The rules require permits, notifications, training, and work plan submissions to EQB, among other items.

OSHA developed the Occupational Exposure to Asbestos regulation to help protect workers from asbestos hazards. The regulation defined Class I through IV asbestos work, established asbestos exposure limits, and implemented asbestos worker protection requirements. Unlike the EPA's regulations, the OSHA regulation was specifically written to protect workers rather than the public. The Puerto Rico Occupational Safety and Health Administration has adopted the federal standard.

Baker reviewed the Federal Property Management Regulations 41 CFR 101-47.304-13 and BRAC policy to identify regulations and guidelines for transferring properties with ACMs. Based on the review of the information, the Navy is required to disclose all knowledge of ACMs at NAPR to any bidders or transferees. This report should be given to parties interested in the NAPR buildings and will serve as the disclosure vehicle. As stated in the Federal Property Management Regulations, any bidders on NAPR buildings should be provided with a "Notice of the Presence of Asbestos—Warning!". The notice can be found in 41 CFR 101-47.304-13.

2.2 Methodology

Baker reviewed several previous ACM reports that had been prepared by others for several of the NAPR buildings. However, Baker elected to not utilize these reports due to their age. Therefore, the inspections were approached as if the buildings had never been inspected.

Baker, with assistance from Environmental Development and Sustainability, Inc., conducted the asbestos inspections in accordance with AHERA, ASHARA and OSHA asbestos regulations during the period of December 1, 2004 to February 15, 2005. NAPR staff assisted in locating buildings and providing access. AHERA-accredited asbestos inspectors identified building materials that could contain asbestos. Building materials were then grouped into homogeneous materials. Homogeneous materials are defined as building materials similar in age, appearance, and texture. The asbestos inspectors then collected representative bulk material samples from each homogeneous material in general accordance with AHERA guidelines. Insulation materials that appeared to be composed of fiberglass were not considered potential (i.e., suspect) ACM. For each homogeneous material, the material description, location(s), approximate quantity, friability, condition, accessibility, and potential for damage were recorded.

In accordance with the Scope of Work, the number of samples for each homogeneous material was based on the quantity of homogeneous material present throughout the building, as follows:

- ≤ 1000 square feet – 3 samples
- ≤ 5000 square feet – 5 samples
- > 5000 square feet – 7 samples

Sample results from a homogeneous material represent the asbestos content for the homogeneous material throughout each particular building, regardless of the sample locations.

As per the scope of work, Baker sampled wallboard and associated joint compound as a composite material. The results are reported for individual layers as well as for the composite material.

Bulk building material samples were sent to Schneider Labs for analysis using polarized light microscopy with dispersion staining. Schneider Labs is accredited for asbestos analysis through the National Voluntary Laboratory Accreditation Program (NVLAP). Homogeneous materials were analyzed until a positive identification of asbestos was made or until all samples of the material were determined to contain less than or equal to 1 percent asbestos. Samples found to contain detectable, but less than 1 percent asbestos, were further analyzed by point count methodology to more accurately define their asbestos content. Quality Control (QC) samples, one per 10 bulk samples, were collected in accordance with the Scope of Work and were analyzed by RJ Lee Group, Inc., another NVLAP accredited laboratory. QC sample results were generally consistent with bulk sample results. However, where conflicting lab results were indicated (i.e., one lab found the material to contain greater than 1 percent asbestos and the other did not), the material was considered to be ACM. Laboratory reports are included in the building-specific summaries. Laboratory reports for QC samples are included in Appendix D. Inspector and laboratory certifications are included in Appendix A.

Table B below shows the buildings that: 1) were inspected as a part of the simultaneously conducted housing inspections (Project 15); 2) were removed according to NAPR staff and/or observation; 3) could not be located by Baker and NAPR staff; and 4) could not be accessed due to lack of keys, impassable access roads, or safety issues.

Table B. Buildings Not Inspected

Included in Housing Inspections	Removed	Could Not Be Located	Could Not Be Accessed
889	871	157	38*
891	2003	247	500 (partial)
893	2191	2222	774 (partial)
895	2224	2314	2439
897	2388	2389	3006
899	2424	2395	
	2438	2442	
	2488	2455	
	2496	2582	
	2508	2583	
	2564	3150	
	2601	6000	
	2685	6001	
		6003	

* In December 2004, Baker requested that Building 38 be removed from the scope of work due to health and safety issues related to the following: no lighting, PCB-contaminated concrete and soil, dilapidated floors, bat infestation and related bat waste, water-filled trenches, and extensive ACM debris. EFANE indicated that Building 38 is part of another on-going environmental investigation, and agreed that Building 38 could be removed from the scope of work.

2.3 Disclaimer

Baker was contracted to perform an ACM inspection of NAPR buildings that would meet the requirements of an Operations and Maintenance Program for ACMs. As such, the inspection was not destructive and did not involve breaking into pipe chases, interstitial spaces or other inaccessible building areas. Therefore, ACMs may exist within inaccessible building areas. The presence or absence of ACMs applies only to materials sampled on the dates of the field visit. It should be noted that conditions might change due to vandalism, deterioration, or maintenance activities. Ongoing monitoring by the owner or transferee is necessary. If additional materials suspected of containing asbestos are identified during renovation or demolition activities, they should be assumed to be ACMs or should be sampled and analyzed before being disturbed.

2.4 Summary of Asbestos-Containing Materials

A total of 2,006 homogeneous materials were identified. Of those, 317 were found by laboratory analysis to be ACM, and five were assumed to be ACM due to access or safety issues that precluded sampling. By definition, an ACM contains greater than 1 percent asbestos. Table 1 in each building section indicates all of the suspect homogeneous materials that were identified for that particular building. Table 2 in each building section provides the following information on each of the identified ACMs: homogeneous material number, material description, asbestos percentage and type, friability, location, condition, and comments.

2.5 Summary of Hazards

Base Realignment and Closure (BRAC) policy considers an ACM to be a hazard when it meets all three of the following conditions: friable, accessible, and damaged. Friable, accessible, and damaged ACM that were identified are presented in Table 3 in each building section. A summary of all friable, accessible, and damaged ACM identified is presented in Table C below.

Table C. ACM Hazards Identified		
Building Number	Material	Quantity
31	Pipe Insulation	2 lf
296	Pipe Insulation	20 lf
426	Duct Insulation	34 sf
598	Pipe Insulation	6 lf
1686	Pipe and Pipe Fitting Insulation	1 lf

3.0 RECOMMENDATIONS

- The information on the presence and location of all ACMs should be communicated to the property transferee.
- The ACM hazards identified should be remedied prior to transfer of the properties.
- If renovation or demolition of buildings is scheduled, a more comprehensive ACM inspection should be conducted to attempt to identify hidden ACM (e.g., behind walls, above ceilings, etc.) that would not have been identified during this non-destructive, baseline study. Also, prior to renovation or demolition, ACM removal and disposal activities must be completed in accordance with EPA, Puerto Rico OSHA, Puerto Rico EQB, and other applicable federal and local regulations.

Final
**Lead-Based Paint Inspection/
Risk Assessment Report**

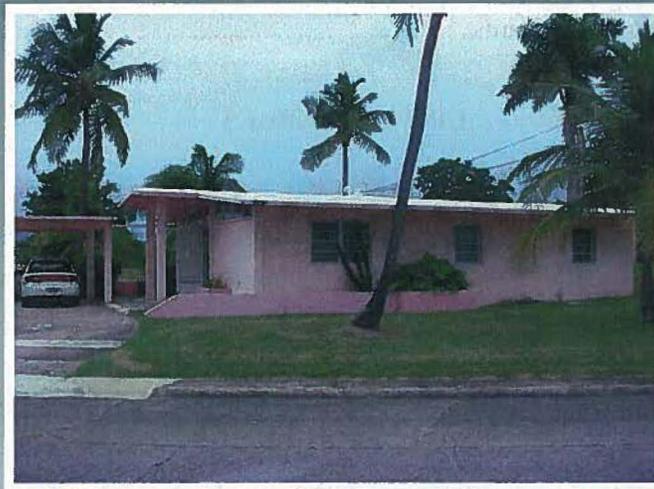
for

**Military Family Housing
Naval Activity Puerto Rico
Ceiba, Puerto Rico**

Volume I of II

(Text and Appendices A through E)

Contract N62472-01-D-1440 • Project Number 15 • June 2005



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Under Contract with
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Naval Facilities Engineering Command
Engineering Field Activity, Northeast



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EXECUTIVE SUMMARY

The US Navy Engineering Field Activity Northeast contracted Baker to perform lead-based paint (LBP) inspections and LBP risk assessments in military family housing at Naval Activity Puerto Rico (NAPR), located near Ceiba, Puerto Rico. The work was performed so that the federal government can transfer the properties. The Navy is considered the owner of all properties referenced in this report. The work was performed in accordance with the Scope of Work: Lead-Based Paint Inspection and Risk Assessment, and Asbestos Survey For Residential Property Transfer, dated September 9, 2004, under Contract Number N62472-01-D-1440. Field work for the project was performed from January 5, 2005 to February 11, 2005.

NAPR housing was reportedly constructed between 1960 and 1975 and contains 962 two, three, and four-bedroom apartment style, duplex, and single-family housing units. NAPR housing consists of eight communities: Algodones, Caribe Breeze, Cascajo Point, Coast Guard, FDR Drive, Manatee Bay, Mangrove Manor, and Rainbow Hill. Twenty-seven of the housing units in Manatee Bay are of original construction, while the remaining 935 units were renovated to varying degrees beginning in 1989. The square footage of the units ranges from 1023 to 2105 square feet. The concrete-framed buildings have concrete or ceramic exterior finishes. Interior walls are painted gypsum board and concrete. The units are generally in good condition.

Table A below summarizes the renovation history for the communities, as provided by the housing office manager.

Table A. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Algodones				
889C, 889E, 889F, 889G, 889H, 891A, 891D, 893B, 893C, 895A, 895B, 895C, 897A, 897B, 897D, 897F, 897G, 897H, and 899B	Two, Three, and Four Bedroom Apartment-Style Units	1960	1991	<ul style="list-style-type: none"> ● Installation of carpeting ● Remodel bathrooms and kitchens ● Replace doors and windows

Table A. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Caribe Breeze				
1A, 2C, 5B, 6B, 10D, 11A, 15A, 16B, 17C, 20A, 20B, 21B, 25C, 25A, 28A, 31B, 34B, 35A, 37A, 38B, 39C, 43B, and 47A American Circle 92A Saratoga Road 1B and 4B Point Cruz	Two, Three, and Four Bedroom Duplex Units	1974	2001 - 2003	<ul style="list-style-type: none"> ● Remove LBP and ACM ● Repaint all walls inside and outside ● Replace vinyl floor tile with ceramic tile ● Replace A/C ductwork and central A/C units ● Upgrade electrical systems ● Replace entrance doors ● Reconfigure outside storage areas and A/C mechanical rooms ● Replace kitchen cabinets ● Replace bathroom fixtures and tiles ● Reconfigure master bedrooms and bathroom ● Replace windows ● Install ceiling fans ● Replace carpeting in upstairs of 2-bedroom units ●
Cascajo Point				
6, 11, 16, 21, 24, 30, and 31 FDR Drive 6 Bataan Drive 5 and 14 San Jacinto Road 4, 7, and 13 Cowrens Drive 4, 5, 13, 14, 19, 26, 29, 30, and 43 Monterey Road 2, 5, 12, and 14 Cabot Lake	Two, Three and Four Bedroom Single Family Houses	1960	1998 - 2001	<ul style="list-style-type: none"> ● Remove LBP and ACM ● Construct screened-in porches ● Repaint all walls inside and outside ● Replace vinyl floor tile with ceramic tile ● Replace A/C ductwork and central A/C units ● Upgrade electrical systems ● Replace kitchen cabinets ● Remodel laundry areas ● Replace bathroom fixtures and tiles ● Reconfigure master bedrooms and bathroom ● Install ceiling fans
Coast Guard				
1675, 1676, 1677, 1678, 1679, and 1680 Intrepid Street	Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> ● Replace floors tiles ● Replace kitchen cabinets ● Install central A/C ● Replace aluminum jealously windows with French type glass louvered windows
FDR Drive				
1, 3, and 5 FDR Drive	Three Bedroom Single Family Houses	1960	1999 - 2000	<ul style="list-style-type: none"> ● Remove LBP and ACM ● Replace carpeting ● Repaint all walls inside and outside ● Replace A/C ductwork ● Reconfigure mechanical room ● Upgrade electrical systems ● Replace kitchen floors and cabinets ● Remodel bathrooms including replace bathroom fixtures (not 1 FDR) ● Install ceiling fans

Table A. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Manatee Bay				
6 and 7 Intrepid Street 8, 11, 20, 36, 38, 49, 52, and 60 Ranger Road 2 and 20 Hancock Circle 4 and 15 Coral Sea Drive 3 and 18 Franklin Drive 8, 19, and 26 Hornet Road 3, 11, 21, 32, and 35 Yorktown Circle 67, 74, and 81 Lexington Drive	Two, Three and Four Bedroom Single Family Houses	1960	2001 - 2003	<ul style="list-style-type: none"> • Remove LBP and ACM • Construct screened-in porches • Repaint all walls inside and outside • Replace vinyl floor tile with ceramic tile • Replace A/C ductwork and central A/C units • Upgrade electrical systems • Reconfigure kitchens and replace kitchen cabinets • Remodel laundry areas • Replace bathroom fixtures and tiles • Reconfigure master bedrooms and bathroom • Install ceiling fans
Mangrove Manor				
11, 12, 19, 20, 31, 38, 50, 68, and 82 Saratoga Road 2, 11, and 17 Essex Drive 6 Ticonderoga Street 18, 25, 34, 41, and 54 Enterprise Drive 9, 26, 33, 46, and 47 Lexington Drive 6, 15, and 32 Wasp Circle 7 Bunker Hill Road	Two, Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> • Same as Coast Guard
Rainbow Hill				
2A, 4A, 4B, 5B, 7A, 8A, 10C, 13B, 14B, 15B, 16A, 18A, 19C, 20B, 22B, 23A, 24A, 27A, 28B, 29B, 32A, 33B, 34A, and 36A Nimitz Drive	Two, Three, and Four Bedroom Duplex and Apartment-Style Units	1975	1998 - 2001	<ul style="list-style-type: none"> • Same as Caribe

In accordance with Department of Housing and Urban Development (HUD) regulations, the Navy is required to inspect and assess NAPR Housing for LBP and LBP hazards and disclose the results of the inspection and assessment to the next owner. The risk assessment must occur no more than 12 months prior to property transfer. Because the housing units were constructed in 1960 and later, LBP hazards are not required to be abated before the sale of the properties.

Baker was unable to obtain previous LBP reports for the properties. It is not known whether LBP inspections and/or risk assessments were previously conducted.

Baker performed LBP inspections in 19 of 32 Algodones housing units, 26 of 136 Caribe Breeze housing units, 26 of 139 Cascajo Point housing units, all six Coast Guard housing units, all three FDR Drive housing units, 26 of 262 Manatee Bay housing units, 27 of 275 Mangrove Manor housing units, and 24 of 88 Rainbow Hill housing units in accordance with the Scope of Work. All of the units were vacant at the time of the inspections. The inspections were performed in accordance with federal regulations. Refer to Table C for a listing of LBP components identified.

Baker also performed LBP risk assessments in the same units in which LBP inspections were conducted. The risk assessments were performed in accordance with federal regulations. LBP hazards were only identified in the Algodones, Coast Guard, Manatee Bay, and Mangrove Manor housing communities, and include deteriorated LBP on various components and slightly elevated lead in dust on floors. Hazards related to friction surfaces, impact surfaces, chewable surfaces, and soil were not identified in these communities. No LBP hazard of any type was identified in the Caribe Breeze, Cascajo Point, FDR Drive, and Rainbow Hill housing communities. Table B summarizes the LBP-related issues for NAPR Housing housing. Tables 1-13 following the text of this report expand upon the information in this table.

Table B. Summary of LBP Issues at NAPR Housing		
Community Addresses	Assessed Units	LBP-containing Components
		LBP Hazards
Algodones		
889A-H 891A-D 893A-D 895A-D 897A-H 899A-D	889C, 889E, 889F, 889G, 889H, 891A, 891D, 893B, 893C, 895A, 895B, 895C, 897A, 897B, 897D, 897F, 897G, 897H, and 899B	None Identified
		Dust – Floors
Caribe Breeze		
1A-47B American Circle 84-92 Saratoga Road 1-4 Point Cruz	1A, 2C, 5B, 6B, 10D, 11A, 15A, 16B, 17C, 20A, 20B, 21B, 25C, 25A, 28A, 31B, 34B, 35A, 37A, 38B, 39C, 43B, and 47A American Circle 92A Saratoga Road 1B and 4B Point Cruz	Concrete Wall
		None Identified

Table B. Summary of LBP Issues at NAPR Housing		
Community Addresses	Assessed Units	LBP-containing Components
		LBP Hazards
Cascajo Point		
4-31 FDR Drive 1-8 Bataan Drive 1-20 San Jacinto Road 1-19 Cowrens Drive 1-55 Monterey Road 1-26 Cabot Lake	6, 11, 16, 21, 24, 30, and 31 FDR Drive 6 Bataan Drive 5 and 14 San Jacinto Road 4, 7, and 13 Cowrens Drive 4, 5, 13, 14, 19, 26, 29, 30, and 43 Monterey Road 2, 5, 12, and 14 Cabot Lake	None Identified
		None Identified
Coast Guard		
1675, 1676, 1677, 1678, 1679, and 1680 Intrepid Street	Same	Wood Ceiling, Wood Door Casing/Jamb/Stop, Wood Door, Wood Folding Door Casing, Wood Folding Door, Wood Shelf/Coat Rack, Wood Shelf/Shelf Support, Wood Sliding Door Casing, Wood Sliding Door, Concrete Wall, and Drywall Wall
		Deteriorated Paint – Wood Door Casing/Jamb/Stop Dust - Floors
FDR Drive		
1, 3, and 5 FDR Drive	Same	None Identified
		None Identified
Manatee Bay		
1-20 Intrepid Street 1-60 Ranger Road 1-28 Hancock Circle, 1-37 Coral Sea Drive 1-18 Franklin Drive 1-26 Hornet Road 1-54 Yorktown Circle 67-93 Lexington Drive	6 and 7 Intrepid Street 8, 11, 20, 36, 38, 49, 52, and 60 Ranger Road 2 and 20 Hancock Circle 4 and 15 Coral Sea Drive 3 and 18 Franklin Drive 8, 19, and 26 Hornet Road 3, 11, 21, 32, and 35 Yorktown Circle 67, 74, and 81 Lexington Drive	None Identified
		Dust – Floors
Mangrove Manor		
1-82 Saratoga Road, 1-22 Essex Drive 1-12 Ticonderoga Street 1-60 Enterprise Drive 1-58 Lexington Drive 1-38 Wasp Circle 1-8 Bunker Hill Road	11, 12, 19, 20, 31, 38, 50, 68, and 82 Saratoga Road 2, 11, and 17 Essex Drive 6 Ticonderoga Street 18, 25, 34, 41, and 54 Enterprise Drive 9, 26, 33, 46, and 47 Lexington Drive 6, 15, and 32 Wasp Circle, 7 Bunker Hill Road	Wood Door Casing/ Jamb/Stop, Wood Door, Ceramic Exterior Wall, Wood Sliding Door, and Wood Window Sash
		Dust – Floors
Rainbow Hill		
1A-36B Nimitz Drive	2A, 4A, 4B, 5B, 7A, 8A, 10C, 13B, 14B, 15B, 16A, 18A, 19C, 20B, 22B, 23A, 24A, 27A, 28B, 29B, 32A, 33B, 34A, and 36A Nimitz Drive	None Identified
		None Identified

Table B. Summary of LBP Issues at NAPR Housing

For NAPR Housing:

Actions:

1) Test the components in/on the remaining 804 units that were not inspected for LBP, determine which components contain LBP, and assess for LBP hazards,

Or

2) Assume all like components contain LBP and assess the other 804 units for LBP hazards

HUD requires that LBP hazards be abated in housing constructed prior to 1960. Because the housing units that were the subject of this study were reportedly constructed in 1960 or later, abatement of the identified LBP hazards is not required by HUD.

Control options are nevertheless listed below.

Control options for deteriorated LBP include:

- Paint Film Stabilization (considered an interim control)
- Encapsulation
- Enclosure
- Paint Removal
- Building Component Replacement

Control options for dust include:

- Dust Removal
- Cover Bare Soil

Control options for soil include:

- Plant Grass or Sod
- Cover with Mulch
- Pave Over
- Soil Removal

Other recommendations include: 1) The property transferee should be made aware of the presence of LBP and LBP hazards in the housing units, 2) Contractors who disturb LBP should comply with the requirements of the Puerto Rico Occupational Safety & Health Administration (OSHA) Lead Standard, which mirrors the federal OSHA standard (29 CFR 1926.62).

1.0 INTRODUCTION

The US Navy Engineering Field Activity Northeast contracted Baker to perform lead-based paint (LBP) inspections and LBP risk assessments in military family housing at Naval Activity Puerto Rico (NAPR), located near Ceiba, Puerto Rico. The work was performed so that the federal government can transfer the properties. The Navy is considered the owner of all properties referenced in this report. The work was performed in accordance with the Scope of Work: Lead-Based Paint Inspection and Risk Assessment, and Asbestos Survey For Residential Property Transfer, dated September 9, 2004, under Contract Number N62472-01-D-1440. Field work for the project was performed from January 5, 2005 to February 11, 2005.

The body of the report is followed by the following appendices that contain supporting data:

- Appendix A contains a map of NAPR that shows the locations of each of the housing communities, and floor plans of each style of housing unit that was inspected.
- Appendix B contains inspector training certificates, company licenses, and laboratory certificates of accreditation.
- Appendix C contains the Niton XRF Analyzer Performance Characteristic Sheet and XRF analyzer calibration data.
- Appendix D contains analytical laboratory reports.
- Appendix E contains photographs pertinent to the LBP inspection. A CD that includes all of these photographs accompanies this report.
- Appendix F contains paint, soil sample, dust sample, and building condition data.

While preparing this report, Baker consulted the following regulations, guidance documents and policies:

- 24 CFR 35, Subparts A, B, C and R -Department of Housing and Urban Development (HUD) LBP Requirements.

- 29 CFR 1926.62 -Occupational Safety and Health Administration (OSHA) Lead Construction Standard.
- 40 CFR 745, Subparts D, L, and Q -Environmental Protection Agency (EPA) LBP Requirements.
- 41 CFR 101-47 – General Services Administration Federal Property Management Regulations: Utilization and Disposal of Real Property.
- 15 United States Code 2680, 2681 and 2688 -Toxic Substances Control Act.
- Department of Defense (DoD) Base Realignment and Closure Act (BRAC) Policy on Asbestos, Lead Paint and Radon Policies at BRAC Properties (October 31, 1994).
- HUD Guidelines 1995: Chapters 5 and 7, 1997 Revision.
- American Society for Testing and Materials E-6 -Standards for Lead.
- EPA 747-R-95-001 *Residential Sampling for Lead: Protocols for Dust and Soil Sampling*, March 1995.
- Puerto Rico Environmental Quality Board (EQB) Lead Regulations.

1.1 Housing Community Overview

NAPR housing was reportedly constructed between 1960 and 1975 and contains 962 two, three, and four-bedroom apartment style, duplex, and single family units. NAPR housing consists of eight communities: Algodones, Caribe Breeze, Cascajo Point, Coast Guard, FDR Drive, Manatee Bay, Mangrove Manor, and Rainbow Hill. Twenty-seven of the housing units in Manatee Bay are of original construction, while the remaining 935 units were renovated to varying degrees beginning in 1989. The square footage of the units ranges from 1023 to 2105 square feet. The concrete-framed buildings have concrete or ceramic exterior finishes. Interior walls are painted gypsum board and concrete. The units are generally in good condition.

Table C below summarizes the renovation history for the communities, as provided by the housing office manager.

Table C. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Algodones				
889C, 889E, 889F, 889G, 889H, 891A, 891D, 893B, 893C, 895A, 895B, 895C, 897A, 897B, 897D, 897F, 897G, 897H, and 899B	Two, Three, and Four Bedroom Apartment-Style Units	1960	1991	<ul style="list-style-type: none"> ● Installation of carpeting ● Remodel bathrooms and kitchens ● Replace doors and windows
Caribe Breeze				
1A, 2C, 5B, 6B, 10D, 11A, 15A, 16B, 17C, 20A, 20B, 21B, 25C, 25A, 28A, 31B, 34B, 35A, 37A, 38B, 39C, 43B, and 47A American Circle 92A Saratoga Road 1B and 4B Point Cruz	Two, Three, and Four Bedroom Duplex Units	1974	2001 - 2003	<ul style="list-style-type: none"> ● Remove LBP and ACM ● Repaint all walls inside and outside ● Replace vinyl floor tile with ceramic tile ● Replace A/C ductwork and central A/C units ● Upgrade electrical systems ● Replace entrance doors ● Reconfigure outside storage areas and A/C mechanical rooms ● Replace kitchen cabinets ● Replace bathroom fixtures and tiles ● Reconfigure master bedrooms and bathroom ● Replace windows ● Install ceiling fans ● Replace carpeting in upstairs of 2-bedroom units
Cascajo Point				
6, 11, 16, 21, 24, 30, and 31 FDR Drive 6 Bataan Drive 5 and 14 San Jacinto Road 4, 7, and 13 Cowrens Drive 4, 5, 13, 14, 19, 26, 29, 30, and 43 Monterey Road 2, 5, 12, and 14 Cabot Lake	Two, Three and Four Bedroom Single Family Houses	1960	1998 - 2001	<ul style="list-style-type: none"> ● Remove LBP and ACM ● Construct screened-in porches ● Repaint all walls inside and outside ● Replace vinyl floor tile with ceramic tile ● Replace A/C ductwork and central A/C units ● Upgrade electrical systems ● Replace kitchen cabinets ● Remodel laundry areas ● Replace bathroom fixtures and tiles ● Reconfigure master bedrooms and bathroom ● Install ceiling fans
Coast Guard				
1675, 1676, 1677, 1678, 1679, and 1680 Intrepid Street	Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> ● Replace floors tiles ● Replace kitchen cabinets ● Install central A/C ● Replace aluminum jealously windows with French type glass louvered windows
FDR Drive				
1, 3, and 5 FDR Drive	Three Bedroom Single Family Houses	1960	1999 - 2000	<ul style="list-style-type: none"> ● Remove LBP and ACM ● Replace carpeting ● Repaint all walls inside and outside ● Replace A/C ductwork ● Reconfigure mechanical room ● Upgrade electrical systems ● Replace kitchen floors and cabinets ● Remodel bathrooms including replace bathroom fixtures (not 1 FDR) ● Install ceiling fans

Table C. Renovation History for NAPR Housing				
Address of Units Inspected	Style of Housing	Date of Const.	Date(s) of Renov.	Description of Renovation
Manatee Bay				
6 and 7 Intrepid Street 8, 11, 20, 36, 38, 49, 52, and 60 Ranger Road 2 and 20 Hancock Circle 4 and 15 Coral Sea Drive 3 and 18 Franklin Drive 8, 19, and 26 Hornet Road 3, 11, 21, 32, and 35 Yorktown Circle 67, 74, and 81 Lexington Drive	Two, Three and Four Bedroom Single Family Houses	1960	2001 - 2003	<ul style="list-style-type: none"> ● Remove LBP and ACM ● Construct screened-in porches ● Repaint all walls inside and outside ● Replace vinyl floor tile with ceramic tile ● Replace A/C ductwork and central A/C units ● Upgrade electrical systems ● Reconfigure kitchens and replace kitchen cabinets ● Remodel laundry areas ● Replace bathroom fixtures and tiles ● Reconfigure master bedrooms and bathroom ● Install ceiling fans
Mangrove Manor				
11, 12, 19, 20, 31, 38, 50, 68, and 82 Saratoga Road 2, 11, and 17 Essex Drive 6 Ticonderoga Street 18, 25, 34, 41, and 54 Enterprise Drive 9, 26, 33, 46, and 47 Lexington Drive 6, 15, and 32 Wasp Circle 7 Bunker Hill Road	Two, Three and Four Bedroom Single Family Houses	1960	1989 - 1992	<ul style="list-style-type: none"> ● Same as Coast Guard
Rainbow Hill				
2A, 4A, 4B, 5B, 7A, 8A, 10C, 13B, 14B, 15B, 16A, 18A, 19C, 20B, 22B, 23A, 24A, 27A, 28B, 29B, 32A, 33B, 34A, and 36A Nimitz Drive	Two, Three, and Four Bedroom Duplex and Apartment-Style Units	1975	1998 - 2001	<ul style="list-style-type: none"> ● Caribe Breeze

Floor plans of the housing units are included in Appendix A, and exterior photographs are presented in Appendix E.

2.0 LEAD-BASED PAINT INSPECTION

2.1 Regulatory Background

NAPR Housing units are federal properties and are subject to federal regulations. The DoD recognizes that the Residential Lead-Based Paint Hazard Reduction Act governs LBP activities in DoD residential housing. The Act, commonly known as Title X of the Housing and Residence Development Act of 1992 (42 United States Code 4822), requires federal departments and agencies to address lead hazards in residential properties. The following table identifies the salient sections of Title X.

Table D. Lead-Based Paint Hazard Reduction Act (Title X)	
Section Number	Regulatory Requirement
402	Train and certify people involved in LBP activities
403	Create provisions for developing regulations for identifying LBP hazards in residential property, including standards for dust and soil
1013	Inspect and abate LBP hazards in all federally owned target housing constructed prior to 1960 when transferring property. Inspect all federally owned target housing constructed between 1960-1977 for LBP and LBP hazards when transferring property
1012 and 1013	Directs HUD to issue regulations requiring LBP inspections, risk assessments and interim controls and abatement of LBP hazards in federally owned target housing and target housing receiving federal assistance when transferring property
1018	Disclose known LBP and LBP hazards before sale or lease of federally owned and federally assisted housing

HUD and the EPA developed regulations to implement Title X. The implementing regulations are 24 CFR 35 and 40 CFR 745. Within 24 CFR 35, Subpart A describes disclosure responsibilities, Subpart B provides definitions and establishes programs, Subpart C addresses federal property transfers and Subpart R establishes methods and standards for assessing LBP hazards. Within 40 CFR 745, Subpart D provides information on identifying dangerous levels of lead and Subpart L establishes the HUD guidelines as the criteria for performing risk assessments and creating risk assessment reports.

Baker reviewed BRAC policy and HUD regulations to identify the requirements for transferring properties with LBP. Based on the review of the information, the Navy is not required to abate LBP hazards at NAPR Housing, or insure that the purchaser abates LBP hazards prior to use as

target housing. However, the Navy is required to disclose all knowledge of LBP and LBP hazards at NAPR Housing to any bidders or transferees. This report should be given to parties interested in NAPR Housing and will serve as the disclosure vehicle. The results of the LBP inspection and LBP risk assessment should be incorporated into the Environmental Baseline Survey of NAPR Housing. The LBP inspection and risk assessment should be referenced in the Findings of Suitability for Transfer as well as the deed or contract for sale of NAPR Housing.

The Puerto Rico EQB requires licensing of firms and individuals involved in inspection, assessment, and abatement of LBP. It also requires notification and permitting procedures for LBP abatement projects.

HUD regulations were followed for the disposition of residential property owned by a federal agency other than HUD. Puerto Rico EQB and/or EPA-accredited LBP Inspectors/Risk Assessors performed all work for this project.

2.2 Methodology

This LBP inspection involved testing paint for lead using an x-ray fluorescence (XRF) analyzer. According to EPA and HUD guidelines, XRF testing is an acceptable technology to determine the concentration of lead in paint. Baker subcontracted the services of Environmental Development and Sustainability, Inc. (EDS) of Catano, Puerto Rico to conduct the XRF testing. Baker is located at 100 Airside Drive, Moon Township, Pennsylvania, 15108, telephone number (412) 269-6300. EDS is located at Las Nereidas St., Cond. Bahia Court, #1, Catano, Puerto Rico, 00962, telephone number (787) 788-7644. Mr. Ramon E. Ramirez and Mr. Jose Marquez, EPA/Puerto Rico EQB certified Inspectors/Risk Assessors, performed the XRF testing at Baker's direction using a Niton XRF spectrum analyzer Model Number XL-309. The analyzer has a Performance Characteristic Sheet (PCS) that defines the parameters for its use in the field; a copy of the PCS is included in Appendix C. XRF testing results by housing unit are included in Appendix F. XRF results are reported in milligrams of lead per square centimeter (mg/cm^2). According to federal and Puerto Rico EQB regulations, paint is considered lead based when XRF test results equal or exceed $1.0 \text{ mg}/\text{cm}^2$.

Each testing combination in each room equivalent was tested for lead. A room equivalent refers to a distinct room (e.g., Kitchen, Bedroom 1), while a testing combination refers to a given room, component, and substrate combination (e.g., kitchen, window sash, wood). With the exception of walls, one reading was taken on each testing combination in each room equivalent. Four readings were collected from the walls in each room equivalent, one from each wall. For each housing unit, testing combinations, paint colors, paint conditions, location(s), approximate quantities (if positive and in fair or poor condition), and XRF readings were recorded. For simplicity, all readings that were less than 0.1 mg/cm² were recorded as 0.0 mg/cm².

The identification of walls for a given room is as follows: Wall 1 is the wall that is located on the street side of the room, when in the room looking toward the street. Walls 2, 3, and 4 are the walls that are present going clockwise from Wall 1.

2.3 Selecting Units for Inspections

Per the Scope of Work, ACM inspections were performed in 19 of 32 Algodones housing units, 26 of 136 Caribe Breeze housing units, 26 of 139 Cascajo Point housing units, all six Coast Guard housing units, all three FDR Drive housing units, 26 of 262 Manatee Bay housing units, 27 of 275 Mangrove Manor housing units, and 24 of 88 Rainbow Hill housing units. NAPR Housing units selected for LBP inspection were chosen randomly. Units selected for LBP inspection are listed in Table E below. All units were vacant at the time of the inspections.

Table E. Units Selected for LBP Inspection at NAPR Housing	
Address	Date Inspected
Algodones	
889C	February 1, 2005
889E	February 1, 2005
889F	February 2, 2005
889G	February 2, 2005
889H	February 7, 2005
891A	February 3, 2005
891D	February 3, 2005
893B	February 3, 2005
893C	February 4, 2005
895A	February 4, 2005
895B	February 4, 2005
895C	February 4, 2005

Table E. Units Selected for LBP Inspection at NAPR Housing

Address	Date Inspected
Algondones	
897A	February 7, 2005
897B	February 2, 2005
897D	February 2, 2005
897F	February 2, 2005
897G	February 2, 2005
897H	February 2, 2005
899B	February 1, 2005
Caribe Breeze	
1A American Circle	January 5, 2005
2C American Circle	January 9, 2005
5B American Circle	January 7, 2005
6B American Circle	January 7, 2005
10D American Circle	January 10, 2005
11A American Circle	January 10, 2005
15A American Circle	January 10, 2005
16B American Circle	January 10, 2005
17C American Circle	January 11, 2005
20A American Circle	January 11, 2005
20B American Circle	January 11, 2005
21B American Circle	January 12, 2005
24C American Circle	January 12, 2005
25A American Circle	January 12, 2005
28A American Circle	January 12, 2005
31B American Circle	January 12, 2005
34B American Circle	January 13, 2005
35A American Circle	January 13, 2005
37A American Circle	January 13, 2005
38B American Circle	January 14, 2005
39C American Circle	January 14, 2005
43B American Circle	January 14, 2005
47A American Circle	January 17, 2005
92A Saratoga Drive	January 17, 2005
1B Point Cruz	January 17, 2005
4B Point Cruz	January 17, 2005
Casajo Point	
6 FDR Drive	January 20, 2005
11 FDR Drive	January 20, 2005
16 FDR Drive	January 20, 2005
21 FDR Drive	January 20, 2005
24 FDR Drive	January 20, 2005
30 FDR Drive	January 21, 2005
31 FDR Drive	January 21, 2005
6 Bataan Drive	January 20, 2005
5 San Jacinto Road	January 27, 2005
14 San Jacinto Road	January 25, 2005
4 Cowrens Drive	January 21, 2005
7 Cowrens Drive	January 24, 2005
13 Cowrens Drive	January 24, 2005

Table E. Units Selected for LBP Inspection at NAPR Housing

Address	Date Inspected
Cascajo Point	
4 Monterey Road	January 26, 2005
5 Monterey Road	January 26, 2005
13 Monterey Road	January 26, 2005
14 Monterey Road	January 27, 2005
19 Monterey Road	January 27, 2005
26 Monterey Road	January 27, 2005
29 Monterey Road	January 27, 2005
30 Monterey Road	January 27, 2005
43 Monterey Road	January 27, 2005
2 Cabot Lake	January 24, 2005
5 Cabot Lake	January 24, 2005
12 Cabot Lake	January 24, 2005
14 Cabot Lake	January 27, 2005
Coast Guard	
1675 Intrepid Street	January 31, 2005
1676 Intrepid Street	January 31, 2005
1677 Intrepid Street	February 1, 2005
1678 Intrepid Street	February 5, 2005
1679 Intrepid Street	February 5, 2005
1680 Intrepid Street	January 31, 2005
FDR Drive	
1 FDR Drive	January 19, 2005
3 FDR Drive	January 21, 2005
5 FDR Drive	January 19, 2005
Manatee Bay	
6 Intrepid Street	January 6, 2005
7 Intrepid Street	January 7, 2005
8 Ranger Road	January 7, 2005
11 Ranger Road	January 7, 2005
20 Ranger Road	January 10 2005
36 Ranger Road	January 11, 2005
38 Ranger Road	January 10, 2005
49 Ranger Road	January 10, 2005
52 Ranger Road	January 10, 2005
60 Ranger Road	January 11, 2005
2 Hancock Circle	January 11, 2005
20 Hancock Circle	January 11, 2005
4 Coral Sea Drive	January 12, 2005
15 Coral Sea Drive	January 12, 2005
3 Franklyn Drive	January 12, 2005
18 Franklyn Drive	January 12, 2005
8 Hornet Road	January 13, 2005
19 Hornet Road	January 13, 2005
26 Hornet Road	January 13, 2005
3 Yorktown Circle	January 14, 2005
11 Yorktown Circle	January 14, 2005
21 Yorktown Circle	January 14, 2005
32 Yorktown Circle	January 14, 2005

Table E. Units Selected for LBP Inspection at NAPR Housing

Address	Date Inspected
Manatee Bay	
35 Yorktown Circle	January 17, 2005
67 Lexington Drive	January 18, 2005
74 Lexington Drive	January 18, 2005
81 Lexington Drive	January 18, 2005
Mangrove Manor	
11 Saratoga Road	January 19, 2005
12 Saratoga Road	January 19, 2005
19 Saratoga Road	January 19, 2005
20 Saratoga Road	January 19, 2005
31 Saratoga Road	January 20, 2005
38 Saratoga Road	January 20, 2005
50 Saratoga Road	January 20, 2005
68 Saratoga Road	January 20, 2005
82 Saratoga Road	January 21, 2005
2 Essex Drive	January 21, 2005
11 Essex Drive	January 21, 2005
17 Essex Drive	January 21, 2005
6 Ticonderoga Road	January 24, 2005
18 Enterprise Drive	January 24, 2005
25 Enterprise Drive	January 24, 2005
34 Enterprise Drive	January 24, 2005
41 Enterprise Drive	January 25, 2005
54 Enterprise Drive	January 25, 2005
9 Lexington Drive	January 25, 2005
26 Lexington Drive	January 26, 2005
33 Lexington Drive	January 26, 2005
46 Lexington Drive	January 26, 2005
47 Lexington Drive	January 26, 2005
6 Wasp Circle	January 26, 2005
15 Wasp Circle	January 27, 2005
32 Wasp Circle	January 27, 2005
7 Bunker Hill Road	January 27, 2005
Rainbow Hill	
2A Nimitz Drive	January 27, 2005
4A Nimitz Drive	January 28, 2005
4B Nimitz Drive	January 28, 2005
5B Nimitz Drive	January 28, 2005
7A Nimitz Drive	January 28, 2005
8A Nimitz Drive	January 28, 2005
10C Nimitz Drive	January 31, 2005
13B Nimitz Drive	January 31, 2005
14B Nimitz Drive	January 31, 2005
15B Nimitz Drive	January 31, 2005
16A Nimitz Drive	February 1, 2005
18A Nimitz Drive	February 1, 2005
19C Nimitz Drive	February 1, 2005
20B Nimitz Drive	February 1, 2005
22B Nimitz Drive	February 2, 2005

Table E. Units Selected for LBP Inspection at NAPR Housing	
Address	Date Inspected
Rainbow Hill	
23A Nimitz Drive	February 2, 2005
24A Nimitz Drive	February 2, 2005
27A Nimitz Drive	February 2, 2005
28B Nimitz Drive	February 3, 2005
29B Nimitz Drive	February 3, 2005
32A Nimitz Drive	February 3, 2005
33B Nimitz Drive	February 3, 2005
34A Nimitz Drive	February 4, 2005
36A Nimitz Drive	February 4, 2005

2.4 Disclaimer

The presence or absence of LBP applies only to tested surfaces on the date of the field visit. It should be noted that conditions might change due to vandalism, deterioration or maintenance activities. Ongoing monitoring by the owner or transferee is necessary. The concentration of lead in paint that renders it a LBP is not relevant for worker protection concerns during construction or maintenance work. When workers disturb paint that contains any level of lead (determined by a valid test method), Puerto Rico OSHA requires adherence to its Lead Standard.

2.5 Results

Baker performed LBP inspections in 19 of 32 Algodones housing units, 26 of 136 Caribe Breeze housing units, 26 of 139 Cascajo Point housing units, all six Coast Guard housing units, all three FDR Drive housing units, 26 of 262 Manatee Bay housing units, 27 of 275 Mangrove Manor housing units, and 24 of 88 Rainbow Hill housing units. Baker's inspection identified LBP on several types of components in the Caribe Breeze, Coast Guard, and Mangrove Manor housing communities. LBP was not identified in the Algodones, Cascajo Point, FDR Drive, Manatee Bay, and Rainbow Hill housing communities. Complete surface-by-surface results for the XRF testing are included in Appendix F. Table B in the Executive Summary also provides a list of the positive components in the Caribe Breeze, Coast Guard, and Mangrove Manor housing communities. A summary of the number of positive and negative XRF readings by component for the housing units in which testing was conducted is included in Tables 1–8 following the text of this report. A list of the components that should be assumed to be coated with LBP in the NAPR Housing units that were not tested is included in Table 9 following the text of this report. Photographs of components coated in LBP are presented in Appendix E.

3.0 LEAD-BASED PAINT RISK ASSESSMENT

3.1 Regulatory Background

Section 2.1 of this report addresses the regulatory background of LBP in the United States.

3.2 Methodology

This LBP risk assessment involved a visual inspection of the units as well as the collection of environmental samples of dust and soil for laboratory analysis. The visual inspection also included a building condition assessment including observation for the presence of holes or cracks in the roof, missing exterior siding, foundation cracks, etc. Building condition forms are included in Appendix F.

Mr. Mark Zetts and Mr. Michael Arthur, EPA-certified Risk Assessors, conducted the visual assessment and directed the collection of environmental samples. Mr. Zetts and Mr. Arthur were assisted by Mr. Ramirez and Mr. Marquez of EDS, who are Puerto Rico EQB / EPA-certified Risk Assessors. Copies of training certificates are included in Appendix B. The methodologies for the environmental sampling performed in support of the risk assessment are discussed below.

During the LBP inspection, painted components were analyzed for lead using an XRF analyzer as stated in Section 2.2. In addition, Baker collected dust wipe samples, dust vacuum samples (where carpets instead of hard floors were present), and soil samples in accordance with HUD and EPA protocols. Dust wipe samples were collected from floors only. The housing units did not have window sills. Field blanks (1 per 20 wipe samples) were also collected and submitted for laboratory analysis. All samples were submitted with chain of custody documentation to Schneider Laboratories, Inc. for lead analysis by EPA Method 3050B/7420.

When bare soil was present, Baker collected composite soil samples. No bare soil was present at Algodones. One composite sample was collected from the children's play area (if present), one was collected from the building's dripline, and one was collected from any other areas of the yard, referred to as "mid-yard." Baker calculated the arithmetic mean of the dripline composite sample and the mid-yard composite sample to represent a yard average. Children's play area composite samples were reported separately.

Schneider Laboratories analyzed the dust wipe and soil samples using EPA method 3050B/7420. Schneider Laboratories is fully accredited for lead analysis under the National Lead Laboratory Accreditation Program. Laboratory certifications are presented in Appendix B. Laboratory reports for dust wipe and soil samples are included in Appendix D. Summaries of dust wipe, dust vacuum, and soil sample results by housing unit are presented in Appendix F.

3.3 Selecting Units for Assessment

The same units that were selected for LBP inspection were also selected for LBP risk assessment.

3.4 Summary of Hazards

Based on federal regulations, a lead hazard exists when one or more of the following conditions exist:

- LBP on a component is deteriorated.
- LBP is present on a friction surface, the LBP shows signs of abrasion, and lead levels in dust on nearest horizontal surface underneath the friction surface exceed dust-lead hazard standards ($40 \mu\text{g}/\text{ft}^2$ for floors; $250 \mu\text{g}/\text{ft}^2$ for windowsills).
- LBP is present on an impact surface, the LBP is damaged/deteriorated, and the damage is caused by impact of a related building component.
- LBP is present on a chewable surface and teeth marks are evident.
- Lead in floor dust wipe samples equals or exceeds 40 micrograms per square foot ($\mu\text{g}/\text{ft}^2$).
- Lead in interior window sill dust wipe samples equals or exceeds $250 \mu\text{g}/\text{ft}^2$.

- Lead in bare soil play area samples equals or exceeds 400 part per million (ppm).
- Lead in bare soil samples equals or exceeds 1,200 ppm as a yard average.

Table F summarizes the LBP hazards identified within NAPR Housing. For additional details on LBP hazards, see Tables 10-13 following the text of the report. Floor plans of typical units are presented in Appendix A. Photographs of typical LBP hazards are presented in Appendix E.

Table F. LBP Hazards Identified in LBP Risk Assessed Units at NAPR Housing				
Address	Hazard / Deteriorated LBP Component	Location	Condition	Quantity
Algodones				
889F	Dust - Floor	Hall 2 Floor	NA	NA
Coast Guard				
1676 Intrepid Street	Wood Door Casing/Jamb/Stop	BR3	Fair	1
1677 Intrepid Street		ST/ME		1
1680 Intrepid Street		BR3, Laundry, and ST/ME		3
1678 Intrepid Street	Dust - Floor	Bath 1 and Kitchen	NA	NA
Manatee Bay				
7 Intrepid Street	Dust - Floor	Bath 2	NA	NA
Mangrove Manor				
68 Saratoga Road	Dust - Floor	Bath 1 - Floor	NA	NA
25 Enterprise Drive		Bath 1, DR - Floor		
6 Wasp Circle		Hall - Floor		

No LBP hazards related to friction surfaces, impact surfaces, chewable surfaces, or soil were identified in the communities in Table F above. No LBP hazard of any type was identified in the Caribe Breeze, Cascajo Point, FDR Drive, and Rainbow Hill housing communities.

Implementation of one of the following two options is recommended for identifying LBP hazards that may exist at the NAPR Housing units that were not inspected:

- Test the components in the remaining 804 units that were not inspected for LBP, and identify all LBP hazards that are present.
- Assume all like components in the untested units contain LBP, and identify all LBP hazards that are present.

Although not required due to the age of NAPR Housing, control options for deteriorated LBP include:

- Paint Film Stabilization (considered an interim control)
- Encapsulation
- Enclosure
- Paint Removal
- Building Component Replacement

Control options for dust include:

- Dust Removal
- Cover Bare Soil

Control options for soil include:

- Plant Grass or Sod
- Cover with Mulch
- Pave Over
- Soil Removal

Other recommendations include:

- 1) The property transferee should be made aware of the presence of LBP and LBP hazards in the housing units.
- 2) Contractors who disturb LBP should comply with the requirements of the Puerto Rico Occupational Safety & Health Administration (OSHA) Lead Standard, which mirrors the federal OSHA standard (29 CFR 1926.62).

Exhibit H

Lead-Based Paint Hazards Advisory Statement

**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, Sale Parcel II - Capehart, 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 non-residential buildings covered by this Transfer. I have also received the *Final Lead-Based Paint Inspection/Risk Assessment Report for Military Family Housing, 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 residential 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

Navy Responses to U.S. Environmental Protection Agency (EPA) Comments
Draft Finding of Suitability to Transfer
Sale Parcel II - Capehart

EPA Comment 1:

EPA does not fully agree with the statement given in Section 5.0.F (Environmental Compliance Agreements/Permits/Orders) of the FOST that "...there are no RCRA obligations related to the Subject Property at this time. EPA considers certain requirements of the January 2007 RCRA Consent Order between the Navy and EPA to be applicable to the Subject Property, including, among others, those given in: a) Paragraph 26 "Notification and Additional Work Requirements for Newly Discovered Releases"; Paragraph 27.H) "Imminent and Substantial Endangerment due to Solid Waste or Hazardous Waste"; and all of Section XVI (Record Retention).

Navy response:

The text of Section 5.F. has been revised to state the following:

On January 29, 2007, the U.S. Department of the Navy and EPA voluntarily entered into a Resource Conservation and Recovery Act (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. Although there are no RCRA solid waste management units or areas of concern on the Subject Property, 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. There are no other environmental compliance agreements, permits, or orders associated with the Subject Property.

EPA Comment 2:

References - the January 2007 Administrative Order on Consent should be listed in the reference section.

Navy response:

The January 2007 Administrative Order on Consent has been added to the list of references in Exhibit A.

ROOSEVELT ROADS REDEVELOPMENT					EXHIBIT F-1			
Parcel 1 & 2								
CONVEYANCE - FOST/FOSL SCHEDULE Rev.3 12/4/2012								
	Site	Navy FOST	Navy	Navy	CTC (FY13 and out programmed monies)	Deeds	Acreage	
		Signed Date	Conveyance Date	Funding				
1	FOST Clean							
EDC SALE PARCEL 1	CERFA Clean Parcel I A	1/24/2008	Initial Closing	N/A	0	CP6	335.341	
	CERFA Clean Parcel I B	1/24/2008	Initial Closing	N/A	0	CP7	305.720	
	CERFA Clean Parcel I C	1/24/2008	Initial Closing	N/A	0	CP8	51.924	
	CERFA Clean Parcel I D	1/24/2008	Initial Closing	N/A	0	CP9	694.268	
	SWMU 16	1/24/2008	Initial Closing	N/A	0			
PARCEL 2	SWMU 26	1/24/2008	Initial Closing	N/A	0			
	SWMU 38	1/24/2008	Initial Closing	N/A	0			
	SWMU 63	1/24/2008	Initial Closing	N/A	0			
	CERFA Clean Parcel II A	1/3/2008	Initial Closing	N/A	0	CP10	402.437	
	CERFA Clean Parcel II B	1/3/2008	Initial Closing	N/A	0	CP11	94.682	
PARCEL "AR"	CERFA Clean Parcel 18	9/7/2010	Initial Closing	N/A	0	CP12	30.433	
CLINIC	CERFA Clean Clinic	11/8/2007	Initial Closing	N/A	0	CP13	2.3190	
TOTAL FOST ACREAGE					Total # FOST Deeds	8	1917.124	
4	FOSL / LIFOC							
ID	SWMU 1	1/3/2021	2/3/2021	30%	\$5M	L24	38.3360	
	SWMU 2	11/18/2017	12/18/2017	30%	\$1.5M	L25	27.6710	
EDC SALE PARCEL 1	SWMU 71	6/19/2019	7/19/2019	20%	\$1M	L29	22.8740	
	SWMU 54	10/29/2016	11/29/2016	80%	\$1.5M	L26	5.2110	
	SWMU 61	3/7/2017	4/7/2017	30%	\$1M	L27	8.0150	
	SWMU 62	7/7/2019	8/7/2019	30%	\$1M	L28	14.5900	
IA	AOC 520	7/25/2016	8/25/2016	80%	\$2M	L30	3.4260	
	AOC 731	3/26/2015	4/26/2015	80%	\$0.5M	L31	0.2990	
	AOC 734	3/26/2015	4/26/2015	80%	\$0.5M	L32	0.2640	
	AOC 735	3/26/2015	4/26/2015	80%	\$0.5M	L34	1.6550	
TOTAL FOSL ACREAGE					Total # FOSL Deeds	10	122.3410	
TOTAL EDC Amendment ACREAGE					Total # Deeds	18	2039.4650	
DATES ASSUME (1) 90 DAY REGULATORY REVIEWS PER CONSENT ORDER, (2) NAVY RECOMMENDED ACTIONS APPROVED WITHOUT CHANGES THAT WOULD DELAY SCHEDULE, (3) NO WEATHER/FUNDING/PERMIT ACQUISITION, (4) AVAILABILITY								