

RCRA FACILITY ASSESSMENT AND INSTALLATION RESTORATION SITES' STATUS AND NAVY RECOMMENDATIONS FOR FUTURE ACTIONS U.S. NAVAL STATION ROOSEVELT ROADS, PUERTO RICO

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Note: See "Introduction to Navy Installation Restoration Program", Enclosure (2), for a brief description of the Navy IR program and CERCLA and their terminology, acronyms and definitions used herein.

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I. RFA SWMUs: NAVY CONCURS WITH CONFIRMATORY SAMPLING PRIOR TO RFI

The Navy concurs with confirmatory sampling, as was suggested in the 1988 RFA report, to be performed prior to the RFI for the sites indicated below. Preparation of a Workplan for the sampling efforts is scheduled to begin the third quarter of fiscal year 1993.

SWMU Site 12, Fire Training Pit Oil/Water Separator

SWMU Site 14, Fire Training Pit

SWMU Site 25, DRMO Past Hazardous Waste Storage

SWMU Site 46, Pole Storage Yard

AOC Site C, Transformer Storage Area near Bldg 2042

II. SWMUs CORRESPONDING TO IR SITES CURRENTLY UNDER IR PROGRAM EFFORTS

Listed here are SWMUs identified in the 1988 RFA report which correspond to areas identified as IR sites. Since further action under the IR program at these sites is currently underway, these sites will not at this time be addressed under RCRA Corrective Action. After issuance of the Naval Station (NAVSTA) Roosevelt Roads HSWA permit and at an appropriate point in time, future actions will be conducted under RCRA Corrective Action and all subsequent documents will follow RCRA format. Prior efforts will not be converted to RCRA format. Even though current efforts continue under the CERCLA format, the RCRA Corrective Action Section of EPA will be kept informed of all efforts and will be provided with an opportunity to review and comment on all work. SWMUs currently in the IR program are indicated below.

SWMU Site 19/IR Site 21, Pesticide Waste Storage Bldg 121 A draft closure plan was prepared for this site and submitted in June 1992 to Mr. Michael Poetzsch, Caribbean Facility Section of EPA Region II; the Navy is awaiting EPA approval. A Workplan for confirmatory sampling efforts is currently being prepared and shall be forwarded by NAVSTA Roosevelt Roads under separate cover for EPA review and comment in July 1992. Both the Caribbean Facility Section and the Caribbean Corrective Action Section of EPA Region II shall receive a copy of all reports regarding the confirmatory sampling efforts. As indicated in the draft closure plan, the confirmatory sampling will be supporting documentation. The sampling results shall be incorporated as part of the closure plan assuming results are received prior to the closure plan approval; otherwise, it will be provided as a separate document to the closure plan.

RI/FS efforts for the following sites began in November 1991. As part of these efforts, a Workplan is currently being prepared and shall be forwarded by NAVSTA Roosevelt Roads under separate cover for EPA review and comment in July 1992.

SWMU Site 1/IR Site 5, Army Crematory Disposal Site

SWMU Site 2/IR Site 6, Langley Drive Disposal Site

SWMU Site 3/IR Site 7, Station Landfill

SWMU Site 9/IR Site 13, Leaded Sludge Pits (Tanks 210 to 217)

SWMU Site 13/IR Site 18, Old Pest Control Shop Bldg 258 & Surrounding Area

SWMU Site 31/IR Site 10, Waste Oil Collection Area, PWD Storage (Bldg 25 Storage Area) Note IR Site 10 is comprised of SWMU Sites 31 & 32 and AOC Site B.

SWMU Site 32/IR Site 10, Battery Collection Area, PWD Storage Yard (Bldg 25 Storage Area) Note IR Site 10 is comprised of SWMU Sites 31 & 32 and AOC Site B.

AOC Site B/IR Site 10, Former PWD Storage Area Bldg (Bldg 25 Storage Area) Note IR Site 10 is comprised of SWMU Sites 31 & 32 and AOC Site B.

RI/FS efforts for the following sites began in October 1988. As part of these efforts, an RI/FS report is currently being prepared and shall be forwarded by NAVSTA Roosevelt Roads under separate cover for EPA review and comment in July 1992. The Remedial Design/Remedial Action (RD/RA) phase, specifically the design, is expected to begin in October 1992.

SWMU Site 10/IR Site 15, Transformer Maintenance Area (Substation 2)

SWMU Site 11/IR Site 16, PCB Storage Compound (Old Power Plant) Bldg 38 Note IR site 16 is comprised of SWMU Sites 11 and 45.

SWMU Site 45/IR Site 16, PCB Spill Area (Old Power Plant, Bldg 38) Note IR site 16 is comprised of SWMU Sites 11 and 45.

III. IR SITES NOT IN THE RFA

A few sites identified in the Initial Assessment Study (IAS) do not correlate to any sites identified in the 1988 RFA report. However, as part of the IR program, the Navy determined that some of these required further action. Therefore, sites not identified in the 1988 RFA report but currently included in the IR program efforts are indicated below. These sites are currently in the RI/FS phase.

IR Site 9, PCB Disposal Dry Dock Area Interim RI/FS efforts began in October 1988. As part of these efforts, a draft Site Summary is currently being prepared and shall be forwarded by NAVSTA Roosevelt Roads under separate cover for EPA review and comment in July 1992. The Navy believes the Site Summary will conclude that this site will not require any further action.

IR Site 14, Ensenada Honda Shoreline and Mangroves RI/FS efforts began in November 1991. As part of these efforts, a workplan is currently being prepared and shall be forwarded by NAVSTA Roosevelt Roads under separate cover for EPA review and comment in July 1992. The Navy believes the results of these efforts will either conclude this site needs no further action or future action may be limited to annual site inspections for any visual oil releases.

IV. SWMUs IDENTIFIED IN THE RFA AS REQUIRING ADDITIONAL INFORMATION

Additional information was requested for some sites identified in the 1988 RFA report that did not correlate with any IR sites. The information on these sites will be provided as soon as it is available.

SWMU Site 16, Waste Explosive Storage, Bldg 1666

SWMU Site 41, Rinse Rack near Sea Bee Pesticide Storage Bldg 3152

AOC Site A, Torpedo Shop

V. RFA SWMUs PROPOSED BY NAVY FOR NO FURTHER ACTION UNDER RCRA CORRECTIVE ACTION

Based on a review of Navy records for the SWMUs identified in the 1988 RFA report and a site visit of the SWMUs performed by the Navy in March 1992, the Navy concludes several of these sites either require no further action or are currently being addressed under regulatory compliance programs other than CERCLA/SARA and RCRA. For the specific reasons outlined below, the Navy requests these SWMUs be dropped from any further action under RCRA Corrective Action efforts.

RFA Site 4, Drone Fuel Drain Oil/Water Separator The 1988 RFA report recommended integrity testing of this separator. However, this separator processes wastewater in contact with JP-4, JP-5, and/or hydraulic oils and lubricants which are categorized as Petroleum, Oils, and Lubricants (POLs). These are excluded as hazardous substances under CERCLA's POL exclusion clause and are non-hazardous materials. In addition, there is no reason to believe these POLs would come in contact with any RCRA hazardous materials. Furthermore, like any other tankage designed and built by the Navy to process wastewaters, the Navy used the working stress method for structural design (comparable to American Concrete Institute Code Section 305) whereby the likelihood of structural cracks are minimized. Considering that there are no hazardous materials,

substances or constitutes other than POL type of compounds and that the unit's physical design minimizes cracks and releases, the Navy recommends no further action under RCRA Corrective Action.

SWMU Site 6/IR Site 11, Former Paint Storage Bldg. 145 This site was identified in both the RFA and IAS. The 1988 RFA report recommended additional information be provided and the IAS recommended further actions (i.e. sampling) under the IR program. During the IAS, samples were taken of some of the material contained in the building [see page 2-8 of the IAS, enclosure (3), for details on sampling effort]. Results indicated that the majority of the material could be classified as hazardous. During the startup of the Site Investigation (SI), it was determined that this site posed an immediate threat. To expedite cleanup, the SI and the Remedial Investigation/Feasibility Study (RI/FS) phases were then skipped, and this site went directly into the RD/RA phase. The RD/RA phase consisted of a removal action. During Spring 1988, all material was recontainerized, removed and properly disposed of, and the floor was cleaned. The building was left completely empty. Since all materials have been removed and spills and leaks have been cleaned up, this site is believed to pose no further threat. The Navy recommends no further action under RCRA or CERCLA due to cleanup of the site.

SWMU Site 7/IR Site 12, Tow Way Road Fuels Farm This site was identified in both the RFA and IAS as requiring further efforts (i.e. sampling). Note IR Site 12 is comprised of SWMU Sites 7 and 8. From 1986 through 1988, an SI (confirmatory sampling) was conducted as part of the IR program. The results of these efforts revealed that this site required further efforts which would appropriately be included under the Navy Underground Storage Tank (UST) program, as the contamination was due solely to petroleum products and the Navy has no reason to believe these POLs came in contact with RCRA hazardous materials. As previously noted, POLs are excluded as hazardous substances under CERCLA. Thus, in 1990, this site was transferred to the Navy UST program. Under the Navy UST program, the final site characterization report was completed for the fuel farm in February 1992 and submitted to Mr. Tomas Rivera, Water Quality Area Director at the P.R. Environmental Quality Board. This final report, which details the sampling that has been performed to date, was conducted to meet Commonwealth of Puerto Rico and UST regulation Part V. A system is currently being installed to remove free product from the site. A corrective action plan will be developed and will include future sampling requirements. It is expected the corrective action plan will be completed by October 1992. Since these contaminants are POLs and have not come into contact with hazardous materials nor are they considered hazardous substances, this site is being handled under the UST program (40 CFR 280). Therefore, the Navy recommends that this site be dropped from further efforts under RCRA Corrective Action.

SWMU Site 8/IR Site 12, Tow Way Road Disposal Pits Note IR Site 12 is comprised of SWMU Sites 7 and 8. Therefore, refer to write-up of SWMU Site 7 above for details.

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SWMU Site 21. Donuts The 1988 RFA report recommended integrity testing for these Donuts. A Donut is a floating oil water separator (OWS) used to treat the bilgewater from Navy vessels prior to discharge. Donuts are not stationary (i.e. mobile) but are moved about the harbor as needed to serve various ships in port; Donuts are "vessels", not RCRA SWMUs. The typical operation of the Donut was to routinely remove floating oil for disposal off-base via a waste oil contract, but Donuts have now been phased out of service due to a Navy policy. Such floating OWS are not used anymore at NAVSTA Roosevelt Roads. Integrity sampling of these Donuts is therefore not appropriate or feasible as these have been placed out of service and are, as noted previously, "vessels".

SWMU Site 22. Ships Waste Offload Barges (SWOBs) The 1988 RFA report recommended integrity testing for these SWOBs. SWOBs are not stationary (i.e. mobile) but are moved about the harbor as needed to serve various ships in port; they are "vessels", not RCRA SWMUs. These SWOBs have several compartments to handle large amounts of waste oil or waste fuel from a ship and such oil and fuels were then disposed off-base. However, NAVSTA Roosevelt Roads is no longer accepting these oils and fuels from any ships nor are ships allowed to discharge them while in port since these SWOBs have been phased out of service due to Navy policy. These SWOBs are no longer used at NAVSTA Roosevelt Roads. Integrity sampling of these SWOBs is therefore not appropriate or feasible as these have been placed out of service and are, as noted previously, "vessels".

SWMU Site 23. Oil Spill Separator Tanks The 1988 RFA report recommended sampling. The Navy performed a site visit during March 1992. No evidence of a release to adjacent soils was observed. The oil spill separator tanks were enclosed within a concrete berm enclosed within a second concrete berm sized about 50' x 50'. During construction of this second concrete berm, the stained asphalt mentioned in the 1988 RFA report was removed and disposed of as part of this construction. Furthermore, these tanks contain POLs and some process water only; there is no reason to believe hazardous materials or hazardous substances have come into contact with the POLs stored within these tanks. And, as previously noted, POLs are excluded as hazardous substances under CERCLA. Since there is lack of evidence of a release to soils, this area is now fully covered by concrete, and does not contain hazardous materials or substances, the Navy recommends this site for no further action under RCRA Corrective Action.

SWMU Site 24. Oil Spill Oil/Water Separator Same discussion as given in SWMU Site 4 applies here.

SWMU Site 26. Abandoned Engine Oil Drums behind Building 544 The 1988 RFA report recommended sampling behind the building in the areas where 55-gallon drums were stored. The Navy, during a site visit in March 1992, found that the conditions at this site have changed from that identified in the 1988 RFA report. Building 544 was demolished in approximately 1990. Only the concrete foundation remains. The 55-gallon drums have been removed and no visual evidence exists of any soil staining as described in the 1988 RFA report. As the area behind this

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building is very large and overgrown with thick vegetation. it would be impossible to determine where to sample. Furthermore, the drums contained POL type substances and are not hazardous materials or hazardous substances. Therefore, the Navy recommends this site for no further action under RCRA Corrective Action.

SWMU Site 27, Capehart Area Wastewater Plant The 1988 RFA report recommended sampling and integrity testing. This site is a conventional wastewater treatment plant servicing the Capehart area sewage collection system operated under NPDES Permit No. PR0020010. Since April 1990 this plant has been operating under a Federal Facility Compliance Agreement (FFCA) for NPDES violations. Actions on the FFCA has been coordinated with Mr. John Kashwana in the Office of Water Enforcement of EPA Region II. Prior to the issuance of the FFCA, EPA required the Navy to conduct a study to determine the cause of violations and determine if such violations were the result of industrial discharges to the sanitary system. Specific industrial sources were identified, and the industrial wastewater for such sources will be pretreated by equipment currently under construction (FY92 MCON Project P-495). Industrial sources are primarily in the Forrestal collection area (SWMU Site 29). These specific industrial sources introduce only oil or fuel into the system. Under the FFCA, the Navy is required to upgrade this plant to meet the current NPDES limit and future Water Quality Standards (WQS) for nutrient removal and toxicity. Plant upgrades are to be completed in August 1994. In order to ensure compliance with the upcoming NPDES permit to be issued, the Navy conducted a piece by piece inspection of the plant. In February 1992, the facility was inspected for detail repairs of tankage and equipment, pipe valves, pumps, etc. Although structural integrity was not the specific focus of the inspection, no problems of this nature were detected in February 1992. Based upon the numerous times the units have been taken out of service for sludge removal and equipment repair, the Navy has no reason to suspect leaks due to structural integrity. It might also be noted that concrete tankage in the Navy is designed by the working stress method which is a design which minimizes the likelihood of cracks (comparable to American Concrete Institute Code Section 350).

The Navy made an application for upgrading the plant to tertiary treatment in October 1990 as is required under the FFCA for NPDES permit modifications. The wastewaters were at that time characterized to the satisfaction of EPA Region II. Also, full characterization of the wastewater was done in the Hayes, Seay, Mattern and Mattern Study, August 1988, for NPDES violations (currently held by Mr. Phil Sweeney, Permit Writer's Branch of EPA Region II). At that time, no hazardous contingents were detected. In order to comply with the new TCLP ruling, the sludge was tested in January 1992 for the presence of hazardous waste using TCLP. Plant residuals currently pass TCLP criteria for hazardous waste. Current activity policy is that no hazardous waste may be introduced into the system. Based on the above reasons and the fact that this site is covered by the NPDES program administered by EPA Region II, it is the Navy's contention that the sewage treatment plant (STP) need not be sampled nor tested for structural integrity under RCRA Corrective Action.

SWMU Site 28. Bundy Area Wastewater Plant The 1988 RFA report recommended sampling and integrity testing. This site is a conventional wastewater treatment plant servicing the Bundy area sewage collection system. Refer to SWMU Site 27 above as to why this SWMU is recommended for no action under RCRA Corrective Action.

SWMU Site 29. Forrestal Wastewater Plant The 1988 RFA report recommended sampling and integrity testing. This site is a conventional wastewater treatment plant servicing the waterfront "Industrial" area sewage collection system. Refer to SWMU Site 27 above as to why this SWMU is recommended for no sampling or integrity testing. Prior to 1990, this site was referred to as the "Industrial Area Wastewater Plant".

SWMU Site 33. AIMD Hazardous Waste Storage Pad This site was not identified in the IAS. Therefore, no studies other than the 1988 RFA report have been prepared for this site. The 1988 RFA report recommended sampling. The Navy, during a site visit in March 1992, found that the conditions at this site have changed from that identified in the 1988 RFA report. The area is no longer used for storage of hazardous waste. The white powder observed in the grass several feet outside the storage pad as noted in the 1988 RFA report was not found, nor was there any other evidence of a release to adjacent soils. Furthermore, the soils immediately adjacent to the pad were removed as part of a construction project. Since there is lack of evidence of a release to soils, the Navy recommends no further action.

SWMU Site 35. Aircraft Wash Rack & Oil/Water Separator The 1988 RFA report recommended this separator for integrity testing. This separator processes wastewater in contact with JP-4, JP-5, or hydraulic oils and lubricants which are categorized as POLs. These are excluded as hazardous substances under CERCLA and there is no reason to believe these POLs have come into contact with RCRA hazardous materials. Furthermore, like any other tankage designed and built by the Navy to process wastewaters, the Navy used the working stress method for structural design (comparable to American Concrete Institute Code Section 305) whereby the likelihood of structural cracks are minimized. Considering that there are no hazardous materials, substances or constituents other than POL type of compounds and that the unit's physical design minimizes cracks and releases, the Navy recommends no further action under RCRA Corrective Action.

SWMU Site 36. Vehicle Wash Rack, near berthing pier The 1988 RFA report recommended integrity testing for this wash rack. This wash rack receives water contaminated with POL type of compounds, wax, detergents, dust, dirt, etc. from washing vehicles and there is no reason to believe this wastewater would come into contact with any hazardous materials nor are these compounds considered hazardous substances. Besides, this wash rack is undersized, so it will be replaced in early fiscal year 1992 as part of a program to upgrade all pretreatment units used to process wastewaters prior to being introduced into the conventional STP. Since

this unit will be replaced and there are no hazardous materials, compounds, or substances present. The Navy recommends no further action under RCRA Corrective Action.

SWMU Site 37. Waste Oil Drum Storage Area near Hangar 200 The 1988 RFA report recommended sampling. Although this site is in the area of IR Site 8 (SWMU Site 43 & 44), it was not identified as part of an IR site. Any prior spills or leaks from the area near Hangar 200 would be covered by the IR efforts at IR Site 8. From 1986 through 1988, two rounds of confirmation sampling were conducted at IR Site 8. The results from these sampling efforts revealed contamination is below action levels (see page 3-27 of Verification Step Rounds 1 and 2 of the Confirmation Study, ESE Inc., April 1988). The Navy recommends this area for no further action under CERCLA or RCRA Corrective Action. A Site Summary is currently being prepared that summarizes the past SI efforts at IR site 8 and presents the Navy's reasons for recommending this site for no further action. The final draft Site Summary shall be forwarded by NAVSTA Roosevelt Roads under separate cover for EPA review and comment in July 1992. Furthermore, these drums contained waste oil, a type of POL, and therefore are not RCRA hazardous materials or hazardous substances under CERCLA.

SWMU Site 38. Sewer Drainage System The 1988 RFA report recommended sampling and integrity testing. Three separate sewer systems serve the Naval Station. The Capehart system serves housing and schools. The Bundy system serves the base administration facilities, hobby shops, fast food eateries, BOQ, and a laundry. The Forrestal system serves the waterfront industrial area, Public Works, Shops, Air Operations and the Sea Bee quarters. It is extensively known that all three systems experience severe inflow problems during rainfall events. To a lesser extent infiltration occurs. The three systems are reaching the end of their useful life. Recently completed in February 1992 was the first phase of a study to detect Inflow-Infiltration (I/I). The second phase to locate specific sources of I/I will commence by July 1992. A follow-on sewer repair project is programmed to start in Fiscal year 1994.

It is acknowledged that where infiltration occurs, the possibility exists that exfiltration could occur. However, such phenomenon usually occurs due to pipes under heavy loads and where pipe joints have separated due to settlement. Typically large pipes, say 12 to 15 inches and larger, experience settlement. This size pipe generally occurs in the lower areas of the Forrestal system where the seasonal groundwater table remains high (above the pipe) thereby causing groundwater infiltration into the system. Where groundwaters do in fact rise above the crown of the pipes, the mere static water pressure of the ground will cause infiltration rather than exfiltration of the sewer pipe contents. Being that the industrial facilities located in the Forrestal system are located in the lowlands of the base where groundwaters are generally high, it is considered very unlikely that exfiltration of the sewer contents has occurred where industrial constituents have been introduced.

The Navy has no knowledge that hazardous constituents have been introduced into the system and it is Activity's policy prohibiting the introduction of hazardous waste into the sewer system. For the above reasons, the Navy recommends no further action under RCRA Corrective Action.

SWMU Site 39, Spent Battery Storage Bldg 3158 The 1988 RFA report recommended sampling. The Navy, during a site visit in March 1992, observed no visible signs of release to the soils. This area is no longer used for storage of spent batteries. Since there is lack of evidence of a release to soils, the Navy recommends this site for no further action under RCRA Corrective Action.

SWMU Site 40, Sea Bee Oil Collection Area The 1988 RFA report recommended sampling. The Navy, during a site visit in March 1992, found that the conditions at this site have changed from that identified in the 1988 RFA report. An important point to be made here is that this area is located within the Sea Bee compound. Sea Bees are a group with mobile units and equipment. The mobile tank mentioned in the 1988 RFA report could not be found anywhere in the compound, nor did anyone know where it was or where it might have been located. The two tanks observed during the 1992 site visit in this compound did not fit the description of the tank mentioned in the 1988 RFA report. The 1988 RFA report indicated the tank was a 300 gallon capacity but the two tanks found are of 1000 and 500-gallon capacity. Since it is impossible to locate the probable location of the tank and no evidence of a release was visible, the Navy recommends this site for no further action under RCRA Corrective Action.

SWMU Site 44/IR Site 8, Aerial Target Systems Drainage Ditch (Drone Washdown) This site was identified in both the RFA and IAS as needing further efforts (i.e. sampling). Note IR Site 8 is comprised of SWMU Sites 43 and 44 and that IR Site 8 is affected by SWMU Sites 4 and 37. From 1986 through 1988, two rounds of confirmation sampling were conducted at IR Site 8 as part of an SI under the IR program. The results from these sampling efforts revealed contamination is below action levels (see page 3-27 of Verification Step Rounds 1 and 2 of the Confirmation Study, ESE Inc. April 1988). Therefore, the Navy recommends this site for no further action under CERCLA or RCRA Corrective Action. A Site Summary is currently being prepared that summarizes the past SI efforts and presents the Navy's reasons for recommending this site for no further action. The final draft Site Summary shall be forwarded by NAVSTA Roosevelt Roads under separate cover for EPA review and comment in July 1992.

AOC Site D, Naval Station Outfalls The 1988 RFA report recommends sampling of Naval Station outfalls to determine the presence of contamination. The outfalls may be classified into two major categories: (1) those which are related to and for the purpose of strictly conveying stormwater, and (2) those for the purpose of conveying process wastewaters from the base's sewage treatment plants.

Under NPDES regulations, stormwater conveyed to an ultimate pointed source from industrial activities shall be permitted. Application for individual groups are due to EPA by October 1, 1992. The NAVSTA Roosevelt Roads was made part of a group application submitted to EPA Region II for stormwater for U.S. Naval Stations during March 1991. Therefore, the base's application is pending EPA approval. Based upon the characterization of the stormwater, EPA will issue appropriate parameters for monitoring and surface water limitations consistent with the P.R. Environmental Quality Boards' Water Quality Standards. The Navy sees no additional sampling necessary as it is being covered by the NPDES program administered by EPA Region II.

For the outfalls discharge from the wastewater treatment plants, such discharges are monitored and are limited according to the NPDES program. Although violation of the NPDES permit have occurred through these three outfalls, they have been for pH, Coliforms, Chlorine Residual (lack of) and BOD₅ or BOD percent removal. Violations have been tied specifically to a broken or marginally functional equipment at each of the plants. Violations from this outfall have been for conventional pollutants caused by poor operations, faulty equipment and the presence of a lot of rainwater. Violations can not be attributed to the introduction of any hazardous constituent into the system. For the above reasons, the Navy recommends no further action under RCRA Corrective Action.

AOC Site E/SWMU Site 47, Local Disposal Areas Although the 1988 RFA report referred to the "Local Disposal Areas" site as both a SWMU and an Area-of-Concern (AOC) during the meeting in March 1992, EPA Region II and the Navy came to an agreement that this site(s) is an AOC and not a SWMU. SWMUs must be identifiable units. The 1988 RFA report was in error for referring to this site as SWMU Site 47. Furthermore, a facility survey (Initial Assessment Study, NEESA 13-051, Sept 1984) conducted in 1984 to determine and define all past hazardous waste material's storage, use, disposal practices and disposal areas on Navy property did not identify this site(s). Therefore, the Navy proposes this site(s) for no further action under RCRA Corrective Action.

VI. RFA SWMUs: NAVY CONCURS WITH NO FURTHER ACTION

Of the 51 sites presented in the 1988 RFA report, not all were recommended for further action or requested additional information. The following RFA sites were recommended for no action under RCRA Corrective Action, and the Navy concurs:

SWMU Site 5, Dumpsters

SWMU Site 15, Hospital Incinerator Bldg 1928

SWMU Site 17, DRMO Hazardous Waste Storage Facility

SWMU Site 18, Ignitable Storage Facility Bldg 2009

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SWMU Site 20. Waste Oil Tank Truck near Bldg 860

SWMU Site 30. Former Incinerator Site adjacent to landfill entrance

SWMU Site 42. Water Treatment Plant Sludge Lagoons

SWMU Site 43/IR Site 8. Drone Washdown Area

VII. IR SITES CONTINUED UNDER IR PROGRAM BUT NOT UNDER RCRA CORRECTIVE ACTION

The IAS evaluated NAVSTA Roosevelt Roads as well as those Activities that are a part of the base even though not located within the base's boundaries. The Navy's Activities on Vieques Island are examples of this. The sites indicated below will not be under RCRA Corrective Action but will continue to be handled under the IR program.

IR Site 1. Quebrada Disposal Site Vieques RI/FS efforts began in November 1991. The Workplan is currently being prepared and shall be forwarded for TRC member review and comment in July 1992.

IR Site 2. Mangrove Disposal Site Vieques RI/FS efforts began in November 1991. The Workplan is currently being prepared and shall be forwarded for TRC member review and comment in July 1992.

IR Site 3. IRFNA/MAF-4 Disposal Site Vieques Interim RI/FS efforts began in October 1988. The final draft Site Summary shall be forwarded for TRC review and comment in July 1992. The Navy believes the Site Summary will conclude that this site will not require any further actions.

IR Site 4. Fuels Off-Loading Site Vieques This site was dropped from the IR program after completion of the IAS since information collected indicated this site did not warrant further investigation under the IR Program.

IR Site 19. West Explosive Ordnance Disposal Range Vieques This site was dropped from the IR program after completion of the IAS since information collected indicated this site did not warrant further investigation under the IR Program.

IR Site 20. Camp Garcia Disposal Site Vieques This site was dropped from the IR program after completion of the IAS since information collected indicated this site did not warrant further investigation under the IR Program.