

Baker

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July 30, 1993

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Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Bldg. N-26)
Norfolk, Virginia 23511-2699

Attn: Mr. James Szykman
Engineer-in-Charge
Code 1823

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0007, Modification 04
Naval Station Roosevelt Roads, Puerto Rico
Letter Report of Site Visit

Dear Mr. Szykman:

As you know, I accompanied the Base and EPA contractor personnel on the recent (June 1 through June 4, 1993) site visit. The visit was prompted by EPAs desire to inspect the various SWMUs one last time prior to draft permit issuance.

During the visit, I observed numerous things regarding the SWMUs that were noted as the inspection continued. These observations have been briefly summarized in the attachment to this letter. It should be noted that no attempt was made to fully document each site in the manner of the EPA. My emphasis during the visit was to highlight potential problems, identify where EPA's contractor was stepping beyond an RFA-type inspection, and to provide regulatory guidance to the base personnel during the inspection.

Please do not hesitate to call me if you have any questions on wish to discuss any particular item in more detail.

Sincerely,

BAKER ENVIRONMENTAL, INC.

William D. Trumbach / for

Thomas C. Fuller
Activity Coordinator

TCF/rw
Attachments

cc: Commander Marchette - PWD NSRR
Sr. S. Castillo - PWD/EED NSRR



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ATTACHMENT 1

Naval Station Roosevelt Roads, Puerto Rico Site Visit Report - Summary Notes July 30, 1993

The following narrative provides a brief summary of the site visit activities undertaken in conjunction with the EPA inspection conducted June 1 through June 4, 1993. Information is provided on a by Solid Waste Management Unit (SWMU) basis in the order in which they were inspected. Recorded are:

- SWMU Identification;
- General Site Description;
- An impression of what appeared to interest the regulatory inspector;
- Any independent observations; and
- Any other appropriate information regarding the individual SWMU or site in general.

Information pertaining to miscellaneous findings and discussions is incorporated chronologically as they occurred.

The inspection was conducted by Mr. Richard Egan of TRC Environmental who is under contract to the EPA. Accompanying Mr. Egan was myself at all times and Sindulfo Castillo, Wilfredo Rivera and Senior Chief Blankenship at various times. In addition, two representatives from the Puerto Rican Environmental Quality Board (EQB) were included in the site visit one of the days.

SWU 3 - Station Landfill

Area around the portion of the landfill between the gate and the active fill area was walked. Found some minor areas where trash was present at the surface. Just off the access road, two plastic five-gallon containers were noted. One was some type of disinfectant and the other was marked in German and was labeled as corrosive. One container held a small quantity of liquid. (Note: S. Castillo informed the landfill operators of this finding and was assured it would be taken care of immediately).

Examined an old tank truck (approximately 5,000 gallons) that was present in the area. The tank was marked "AVGAS". Measurements made with an HNu indicate that no volatile organics were present.

The groundwater monitoring wells were checked as requested by the inspector, by removing all lids and taking HNu measurements. Results of this effort were:

- 07-GW-1 - No detected volatiles;
- 07-GW-2 - Could not locate;
- 07-GW-3 - Could not locate;
- 07-GW-4 - Could not locate;
- 07-GW-5 - No detected volatiles;
- 07-GW-6 - Could not open well;
- 07-GW-7 - No detected volatiles; and
- 07-GW-8 - No detected volatiles.

SWMU 45 - Area Outside Building 38

Two underground bunker oil tanks are located outside of this building. No volatile organics were detected at the top of the tanks (using HNu), and there was no oil staining in the area. S. Castillo told the inspector that remediation of this area was scheduled for the summer. R. Egan broke the surface of the soil with a shovel at a point apparently likely to receive runoff. No HNu readings above background were obtained on the freshly exposed soil.

Found a total of 53 acetylene tanks of various sizes grouped together on the hillward side of the building. Egan was making extensive notes. I informed him that the bottles being managed in the area were a TSCA or OSHA concern, not RCRA, as they did not constitute waste. He agreed, but continued note and picture taking.

The interior of the building smelled stale, but no volatile organic vapors were detected by the HNu. Many drums were stored on pallets (some off) in the contained area within the building. Storage procedures appeared reasonable, although dates on drums were not checked. A number of transformers were also present within the contained area.

Adjacent to the contained area, just inside the large access doorway, were a number of containers (mostly 55-gallon drums) containing pesticides. These materials came from the cleanup of a pesticide storage facility. They are presently awaiting the results of laboratory testing prior to being properly disposed. According to PWD/EED staff, the containers are all actually overpacks. Each one contains a number of smaller containers with the void space between containers filled with vermiculite.

Three small capacitors, containing PCBs, were on the floor inside the building, but were not within containment. There was no leakage from the capacitors in evidence.

SWMU 30 - Former Incinerator Site

Things had not changed from the description of the area in the original RFA with the exception that a small underground tank had recently been removed from the site and the excavated soils were still stockpiled, apparently waiting for laboratory results before returning them to the open excavation.

SWMU 29 - Industrial Area Wastewater Plant

The plant appeared well maintained with no evidence of spills. Construction of new facilities was taking place east of the present site. Did not examine the "plastic-lined aeration lagoon."

Area of Concern A - Torpedo Shop

The Torpedo Shop was toured. It appeared clean and well maintained. Closely examined area where wastes are temporarily stored within the building. This storage appeared well managed with no evidence of spills. Of apparent greatest concern to the inspector was the torpedo wash area where recovered torpedoes are cleaned and drained of residual fluids. This area is contained and under roof; however, some unsealed cracks were present on the pad. While there was no evidence of release, the cracks may provide a preferential pathway.

SWMU 39 - Spent Battery Storage (Building 3158)

Building now stores raw materials with no waste management function. Benches, where batteries were cracked, remain as does some evidence of staining related to acid (yellow). A floor drain is present. It is not known where liquids from the building go from the drain. The pad which was located outside the building is no longer there.

New Area of Interest

A drum-storage area was examined approximately 150 feet north of Building 3158. The area is paved and containment is effected by sandbag dikes. I mentioned to the inspector that this was not a SWMU, since it is all raw material storage (POL material). The area should only be of concern for SPCC purposes, which is not the intent of this investigation.

SWMU 41 - Rinse Rack Near Seabee Pesticide Storage

The wash rack is not used by the present tenants (nor, for that matter, is the pesticide storage), since the group has not been trained in pesticide use. It is unknown if pesticides are still stored in the building since no one in the Seabee organization possessed a key.

The wash rack has not apparently been altered, since the initial RFA. No visible evidence of spills. One drum with a small quantity of liquid was found standing next to the Pesticide Storage Building (3152). The contents of the drum were unknown, since it had been there as long as anyone could remember. (Note: S. Castillo indicated that he would have someone move the drum that afternoon).

New Area of Interest

A new 90-day storage facility has been constructed to the south of Building 3158 in the Seabee area using the area boundary fence as one wall of the unit. The other three sides are fenced and the base is concrete with a berm. The area is used for the storage of primarily POL wastes prior to disposition to DRMO. An examination indicated the site to be fairly new, well managed, and apparently free from spills/releases.

New Area of Interest

Behind Building 3166 is a small fenced area that contained containers. A closer examination indicated the containers to be raw materials, including paints and insecticides. The area has a gravel base with no containment and, while the quantity of materials stored is relatively small, does pose some risk for release. However, since the materials present appear to be all raw material, the area should not be classified as a SWMU.

Immediately outside of this area, along the back wall of Building 3166, were three transformers. The equipment looked new and, regardless, was certainly not a "waste". Inspector was concerned whether they were PCB containing. I indicated that the subject was TSCA, not RCRA. We checked the transformers, but could not find an information plate. S. Castillo was to check with the Seabees to verify transformers age and PCB status.

SWMU 40 - Seabee Oil Collection Area

The mobile storage tank, which contained varying amounts of waste oil is not in use and not on the site. The area where this tank was could not be located.

New Area of Interest

A tank is now located adjacent to the Seabee's building across the street from Public Works. This tank, which has a capacity of approximately 500 gallons, is in a containment area with a ramp leading to the fill port. Markings on the tank indicate it to be for waste oil.

According to the Seabee representative, the tank is not used. Visual evidence of cleanliness would support this assertion. Egan broke the gravel surface beneath what would appear to be the drain to expose soil. No level in excess of background was recorded when the freshly exposed material was subjected to HNu screening.

SWMU 31 - Waste Oil Collection Area (PWD Storage Yard)

This area consists of a concrete pad that has a 6-inch curb with a forklift access ramp. Waste oil and related material are stored in various containers within the area. Containers include numerous drums, either full or partially full, and a 500-gallon tank.

The area was generally stained and "tarry" both within and around the containment area. Standing water was present within the area; a heavy oil sheen was visible on the water. Oil stains and fresh oil could be seen partially covering the oil tank, apparently the result of overflows or spillage during filling. The pavement outside, in the front of the unit, was degraded and actually pumped when equipment tires rode over the area. Minor deflection of the HNu was seen in the areas of obvious spills.

Building 2022, which forms the back wall of the containment area, was used for drum storage. There were eight partially-filled drums outside the building and some inside. No evidence of staining was seen. A number of the drums in the building were new and empty. According to the site representative, the drums were stored inside to prevent pilferage.

SWMU 32- Battery Collection Area (PWD Storage Yard)

The area originally identified for battery collection is no longer used and could not be positively identified in the field.

New Area of Interest

In the back end of the PWD yard, an area was found that contained approximately 50 drums of waste oil and soil. The material is apparently from the clean-out of oil/water separators. There is no containment in the area. No staining, in or around the area, was visible. It was indicated that the drums were temporarily there pending off-site disposal.

In this same area is the new battery collection area. This unit consists of a large fiberglass box with a lid in which the batteries are placed until a sufficient quantity has been accumulated to dispose. During the inspection, no batteries were present in the box; however, 3-4 inches of water covered the bottom as a result of the lid being inadvertently being left open.

A single securely packed pallet of old batteries was present. Site personnel indicated that the pallet had been packed that morning and was scheduled for pickup later in the day.

During our visit at this site, the inspection team was joined by two representatives of the Puerto Rican EQB.

SWMU 19 - Pesticide Waste Storage (Building 121)

This site has not been touched since the original RFA in 1988. Inspector inquired about recent sampling. I indicated that there had been some to support closure plans, but that I did not know enough about the results to discuss them.

SWMU 6 - Former Paint Storage (Building 145)

This structure has not been disturbed since the original RFA. The lower parts, which are below ground, are partially filled with water.

AOC B - Former PWD Storage Yard (Building 25)

The building has been removed; area is now used as storage for Army. Building pad is now storage for wood, sandbags and bulldozers. Additionally, approximately 16 drums, containing raw material lube oils, were stored at one end of the pad. The drums, which Army personnel informed us were to be removed soon, were covered with an oil-stained tarp. Near the drums was one paint can and a five-gallon can of roof or gear tar. There were no visible signs of release, with the exception of staining on the tarp and miscellaneous areas on the pad.

The Army representatives indicated that there was a waste accumulation point across the road at their new motor pool that consisted of waste oil tanks. Although this was pointed out to the inspector, he chose not to look at the site.

SWMU 15 - Hospital Incinerator (Building 1928)

Operating incinerator was clean and area was obviously well maintained. Near the incinerator, on the asphalt, was a small metal (Sears-type) building that is used for storage. This was also very clean and appeared well managed. Two small boxes, labeled "biohazard" from Sabana Seca, were on the pad outside of the building.

SWMU 36 - Vehicle Wash Rack-Oil/Water Separator (Near Berthing Pier) also, Apparently Called the USDA Wash Rack

New looking structure in excellent condition. No visible signs of release. Some slightly oily water was present in the separator, which apparently flows to the sanitary sewer.

Site is now used to wash vehicles being landed or leaving Puerto Rico to ensure that agricultural pests are neither imported nor exported.

SWMU 46- Pole Storage Yard

This area is behind Building 2326. Pad now only has some small quantities of wire and insulators on it with most of the area bare. There were no visible signs of releases of any type.

AOC C - Transformer Storage Area (Near Building 2042)

The area contains numerous transformers awaiting disposal. Standing at Building 2042 and looking at the area, there are three separate pads. The left pad contains a number of electrical transformers and other equipment, all of which has been tested, and contains oil which is less than 50 ppm PCB. The center pad, which is contained (about 12-inch curb) and divided down the middle, holds the preponderance of the transformers, all of which have been tested at below 50 PCB. The right pad contains new and broken insulators.

Minor oil staining is evident in the main (center) pad with some areas heavily stained. There are two small areas of staining outside the pad. At some point, a hole was drilled through the containment curb in the front of the pad, apparently to allow water to drain from within the contained area. This hole should be repaired as soon as possible.

Behind the right pad, in the tall weeds, were located three transformers. One was certified below 50 PCB, but the other two were unlabeled.

(Note: These transformers were moved to the contained pad area before the week was out.)

SWMU 10 - Transformer Maintenance Area (Building 90)

Building 90 is IR Site 15.

This area is grass covered and was in the process of being fenced when we were there. Site is to undergo remediation this summer. There were no visible signs of any release.

SWMU 23 - Oil Spill Separator Tanks #1 and #3

The area remains as described in the RFA. The entire rack area was heavily oil stained, but this is a contained area. Site was "dirty", but much of the material is there because it is an active, working, waste management unit. Some staining outside of the unit is visible. (During the week of our visit, this unit received an OSHA violation notice during another inspection).

SWMU 24 - Oil Spill Oil/Water Separator

Containment area heavily stained as a result of waste management procedures. Very oily water was present in the separator at the time of the inspection. There were three waste oil tankers in a contained area adjacent to the O/W separator. Eight drums, containing squeezed oily rags were present between this area and SWMU 23 (the two SWMUs abut).

SWMU 7 - Tow Way Road Fuels Farm

This area has not been significantly altered since the original RFA. There are no visual indications of releases. Recovery of product from the top of groundwater is or was being done (site personnel did not know present status).

The monitoring wells around the site were subjected to headspace measurements with HNu. Results of this screening were:

- UGW-2 - 10 ppm (site representatives believe that this well is located in area of the disposal pits, which comprise SWMU 8 although the actual location of SWMU 8 could not be field determined);
- UGW-4 - ~ 20 ppm
- UGW-5 - 0
- UGW-14 - ~ 40 ppm
- UGW-12 - ~30 ppm
- UGW-3 - ~ 40 ppm
- UGW-13 - ~ 17 ppm
- UGW-17 - ~ 20 ppm
- UGW-18 - ~ 2 ppm
- UGW-16 - ~ 10 ppm
- 12GW-04 - Could not access.
- UGW-8 - 0
- UGW-7 - 0
- UGW-6 - 0
- UGW-15 - ~ 110 ppm

(Note: Walking away from unit, we passed what appeared to be four oil/water separators along the road. These were not inspected nor commented on by inspector.)

SWMU 17 - DRMO Hazardous Waste Storage Facility (Building 1973)

The area appeared very well managed, with separate facilities for each category of waste. With the exception of "General Toxics", which had 14 pallets with four drums/pallet, the storage facility was relatively empty. Drainage from areas (in case of spills) collects in trench which flows to a collection pit. All cracks present in the concrete floor were sealed. Area was clean. According to site representatives, the facility was relatively empty because of a pickup by contractor on the previous day.

There were approximately 25 drums (on pallets) outside of the building on the asphalt parking area. These drums contained POL waste (non-regulated) ready for removal from the base.

SWMU 18 - Ignitable Storage Facility (Building 2009)

This is a metal building, which is diked inside and reachable for fork lifts by a ramp. At the time of inspection, the building contained three pallets of drums and some miscellaneous containers. Floor was seen to be in good condition, with no evidence of releases. There should be no problem with this site in terms of the corrective portion of the permit.

SWMU 25 - Past DRMO Hazardous Waste Storage Area

This SWMU, supposedly located east of present ignitable storage building, could not be found with certainty. The area examined was significantly east (100-150 feet) where racks of raw materials and empty drums are stored. There were approximately ten drums of POL material (waste?). No visible releases associated with this area. Two small test pits were hand dug -- no measurable concentration of subsurface gas was present.

SWMU 9 - Leaded Sludge Pits (Associated with Tanks 212 - 215)

Could not find location of pits in 1988 nor could they be located during this inspection. The headspace was measured in accessible wells with the following results:

- GW 13-01 - 5 ppm
- GW13-07 - Nothing
- GW13-02 - Could not open
- GW13-08 - Nothing

- GW13-03 - No detection
- GW13-09 - Nothing
- GW13-06 - Could not open
- GW13-10 - 1 ppm
- GW13-11 - Could not open

SWMU 13 - Pesticide Building (258)

(Note: At this time, S. Castillo told R. Egan about the "Malaria Control Shop" recently discovered in the jungle. There appeared to be no interest on the part of Egan.)

Site remains as it was in 1988, with the exception that the building has been demolished. Under area where building was located was a storm channel/drain, which connects to the drainage ditch along the road side of the site. No HNu detection of vapors was seen in the drain. The drainages ended (or started) in an approximate 3x7 foot pit, now filled with debris and garbage. HNu readings were taken at the wells with the following results:

- 18GW-03 - Nothing
- 18GW-01 - Could not open
- 18GW-02 - Nothing

SWMU 4- Drone Fuel Drain Oil/Water Separator

This unit is no longer used for its original purpose, and now simply collects stormwater. Some minor oil staining is present in bottom of grated channel.

The unit does not appear to be a problem from a corrective action standpoint.

SWMU 43 - Drone Washdown Area

(NOTE: R. Egan decided at this point to forego looking at the "Malaria Control Shop" in the interest of time.)

The entire area is washdown area which shows no evidence of release. The constructed drain and the downstream drainage channel were inspected and found to be clean and supportive of lush vegetation.

This area does not appear to be a problem from a RCRA corrective action standpoint.

SWMU 20 - Waste Oil Tank Truck

This unit is no longer there and where tank truck was is a grassy area with some brownish area related to gravelly soil.

Now material is within a fenced area where oils and fuels are held in containment. There is valved drainage of containment to an encircling ditch. Two locations were hand dug near the unit in likely areas with nothing detected on the HNu. There are some cracks in the concrete and minor straining. Inventory included: 500-gallon tank for JP-5, 250-gallon tank for diesel, 250-gall tank for gasoline, a paint locker and an oil shed. A 5000-gallon JP-4 tank is nearby but separately contained.

This unit is not a SWMU by determination since only raw product is stored. Possibility of releases from here could be a problem.

SWMU 44 - Aerial Target Systems Drainage Ditch

This unit was looked at during inspection of SWMU 4.

SWMU 37 - Waste Oil Drum Storage Area (near Hanger 200)

Area has been equipped with a curb for containment, covered with a roof, and fully fenced since the 1988 RFA. The SWMU also includes four flammable storage lockers, some paint waste in containers, and three pallets of drums which are located outside the contained area on the tarmac. Apparently, according to site workers, the areas inside and outside are controlled and managed by two separate activities which is why the areas are separate.

Within the fenced/containment area were approximately 10 drums in the process of being filled and approximately 12 filled drums some of which were marked "halogenated." Six flammable storage lockers are also within the fenced area.

Behind the contained area was one small area (approximately 2 by 2 feet) of dead grass. HNu measurements taken on fresh soil from this spot were 200 ppm. Two additional areas were selected and soil was exposed. No volatile organic vapors were detected at these points.

There was no evidence of releases associated with the material managed on the tarmac although it is not in contaminant area.

New Area - "Tent City" on Unused Runway

This area is used to temporarily accumulate wastes when exercises are underway. Presently, area consists of four empty drums on a portable containment pad and one flammable storage locker which was empty. No evidence of release was present at this site.

(NOTE: At this time Egan inspected two large jet fuel tanks by Hanger 200. It was pointed out to him that this was not a SWMU and was covered under the SPCC plan and tank regulations. Also, conducted a walk through of Hanger 200; nothing of note was seen.)

SWMU 2 - Langley Drive Disposal Site

The inspection team walked to the end of the jungle path (largely overgrown) which was created for the Baker investigation. Near the end of the path was one decomposed drum containing a white powder and a quantity of decomposed metal. No volatile organic gases were detected.

Opened well GW-01 and measured headspace with the HNu. No gases were detected.

(NOTE: NSRR personnel indicated to Egan that all transformers in the pole yard area were scheduled for removal during this week or the next. Removal would be performed by a DRMO contractor.)

SWMU 33 - AIMD Hazardous Waste Storage Pad

Location of area is questionable since described area was not where inspected area was found. It is questionable whether right area was inspected.

The area inspected is approximately 200 feet from the building. All that was present was some wheelbarrows and one partially filled garbage can of domestic type waste. One spot of oily metal filings (very small) yielded a 2 ppm reading on the HNu. Two areas off the pad were dug to expose fresh soil. The HNu detected nothing at these points.

New SWMU - AIMD Waste Facility South of Building

This is a covered and fenced facility with a curb used for containment. During the visit, 10 full drums and some partially filled drums of POL waste were present. Some paint waste is stored here on occasion according to site representative.

The area around the unit was stained (oil?) in some places; however, at least 200 feet in all directions is covered by tarmac. Drainage ditch downslope of unit was seen to support lush vegetation. Inside, the floor is heavily stained and wet with oil in some places.

Immediately adjacent to the area was a 250-gallon gasoline tank in sandbag berm. A minor leak was seen from the pumping mechanism. The site representative responded to this leak immediately by using pads from spill package and summoning a repairman. Repairs were underway when we departed the site.

SWMU 35 - Aircraft Washrack Oil/Water Separator (VC-8 Yard)

This oil/water separator appears to be in good condition with no evidence of releases. The oil is removed from the unit and the water is directed to the sanitary sewers. Minor brown oil staining is present on the inside walls of the structure.

SWMU 34 - VC-8 Waste Storage Pad

The trailer originally present and noted in the 1988 RFA is now gone and only a grassy area remains.

Area consists of a fully contained (8 by 13 foot pad) JP-5 tank and a covered, fenced, and contained waste pad.

The tankage is not a SWMU and should not be considered a part of one; however, the containment area around the tank is valved and some minor staining on the ground was noted near the drain valve.

The waste storage area contained many empty and a few filled drums (POL wastes). Normally, the waste storage area holds used hydraulic oil, paint and thinner, oil, and contaminated JP-5. The containment area is valved for drainage and there is no evidence of release at valve points. The drainage ditch, which runs along the near margin (at a distance of approximately 50 feet) is clean and supports lush vegetation.

SWMU 12 - Fire Training Pit Oil/Water Separator

The area around the separator was clean with no evidence of releases. Water in the unit was quite high and had a slight oil sheen. Apparently, the sump pump that transfers the water to the sanitary sewer is not operating. The site representative from EED said he would have the unit pumped that day and would schedule pump maintenance.

SWMU 14 - Fire Training Pit

This unit appears the same as was described in the 1988 RFA. No evidence of releases was seen. In four areas around the concrete apron, the soil was dug and fresh soil was subjected to measurement for gases with the HNu. No concentrations were detected.

Examined the area of the old Fire Training Pit (located outside the Fence). The area is graveled and soil diked with a 6 by 20 foot (approximate) concrete pad located in the center. Area is well vegetated. One HNu reading was taken on freshly exposed soil in the center of the area. No measurable concentrations were detected. This area is no longer used for fire training although it appears that some construction lay-down activities have taken place in the near past.

SWMU 1 - Army Cremator Site (IR Site 5)

Walked along part of the pathway which was cut for the Baker investigation (now largely overgrown). Nothing of any note was seen. Site remains as described in 1988.

Opened well GW5-05. No concentration of volatile organic gases was detected by the HNu.

SWMU 16 - Waste Explosive Storage (Building 1666)

Building was found to be empty and exceptionally clean both inside and out. This is not a SWMU since it does not hold waste, only defective ordnance. When a piece of ordnance is found to be broken (i.e., mechanically inoperative) it is placed in this building prior to final disposition. Leaking propellants or explosives are not placed in Building 1666. This information was provided by site representatives.

SWMU 26 - Abandoned Engine Oil Drums (behind Building 544)

Building 544 is gone. Walked the area that was assumed to be behind where the building once stood. Area has been reworked and contains numerous piles of dirt. No evidence of drums or staining was seen.

SWMU 42 - Water Treatment Plant Sludge Lagoons

These two lagoons contain material from treatment of raw water from the mountains. The units have not changed since 1988 RFA. The lagoons should not be a problem from a RCRA corrective action standpoint.

At the completion of the final day of inspection, an out briefing was conducted for CDMR Marchette. Egan identified the following areas as significant to him:

- Drum by Seabee area pesticide building;
- Fire Training Area non-working pump in the oil/water separator;
- Transformer pad (mostly because he was concerned with quantity for transformers and the three transformers found on the ground away from the pad); and,
- Fuel Pier Oil Facility (which, because of what he saw as heavy oil staining, he labeled the worst site).

Finally, Egan identified Tim Gordan at the EPA Region II as his "Work Assignment Manager."

Following the out briefing by Egan he left the site. I remained behind to provide my impressions to the commander. Among these were:

- The National Guard area has a new waste accumulation area that was not inspected;
- The Malaria Control Shop was pointed out during the inspection but was not visited at the desire of the inspector;
- The various pits/separators in the Tow Way Area that went without inspection;
- A building containing rusting paint cans (not included in the inspection) was found near Building 145;
- The DRMO storage of POL wastes near the flammable storage building may cause problems with determining the size of the SWMU;
- The PWD oil accumulation area with the pumping pavement was a problem area;

- All the well locks and many of the surface closings needed to be replaced; and,
- Many of the areas were not inspected that were identified in the original RFA.

Following the discussion, I left the site.