

Interim Measures Plan  
SWMU 11 - Building 38  
Naval Station Roosevelt Roads  
RCRA/HSWA Permit No. PR2170027203  
Ceiba, Puerto Rico



Prepared For  
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Prepared by



**Baker**  
Environmental, Inc.

**CDM**  
Federal Programs Corp.

## **1.0 INTRODUCTION**

This Interim Measures Plan (IM) Plan for Solid Waste Management Unit (SWMU) 11 – Building 38 Interior at Naval Station Roosevelt Roads (NSRR), has been prepared by Baker Environmental, Inc. (Baker) under contract to the Atlantic Division, Naval Facilities Engineering Command (LANTDIV) Contract Number N62470-02-D-3052, Contract Task Order (CTO) 269. This plan was prepared under the Corrective Action provisions of the Station's RCRA Part B Permit No. PR2170027203, at the request of the United States Environmental Protection Agency (USEPA) in their comment letter dated June 3, 2003 (EPA, 2003). The EPA requested that the Navy develop this plan, if not already in place, to establish engineering controls at this site to prevent site access by workers and/or trespassers to the inside of Building 38.

### **1.1 Site History and Current Conditions**

SWMU 11 at NSRR is the interior of Building 38 which is the “Old Power Plant.” The building was classified as a SWMU based on known releases of polychlorinated biphenyls (PCBs) to the soils outside the building (which have since been remediated through a soil removal action), and the fact that the front portion of the interior served as a Toxic Substance and Control Act (TSCA) regulated PCB storage area where spills and stains were noted. A wipe sampling program was conducted during the RFI from inside the building along the floor and walls. This resulted in 126 individual samples that were analyzed for PCBs.

In addition to the wipe sampling program, a field-screening program was performed for the samples collected in the pits/tunnels running under the floor of the building. This was done, although not required in the approved work plan, since the cooling water tunnels outside the building were known to have some sludge containing PCBs.

Prior to preparation of the report for this work, a fire occurred within the building. The fire was largely confined to debris in the building and the planks that cover the floor pits. No structural damage was done to the building and all firefighting water was contained within the pits.

Currently, the building is un-occupied and is not used for any purpose at NSRR. The Navy has implemented engineering controls to prevent site access from workers and/or trespassers on base. These engineering controls are discussed in the following paragraph.

## 1.2 Existing Engineering Controls

As mentioned above, the Navy has previously implemented engineering controls at SWMU 11 to prevent site access by workers and/or trespassers to the interior areas of Building 38. The current engineering controls consist of:

- The two exterior doors to the building are padlocked and fully secured (see photo's 1 and 2);
- Signs have been installed on the two exterior doors warning people not to enter the building and provides a point of contact (Madeline Rivera) (see photo 3), and
- The staircase leading to the upper level of the building has been removed from the ground area (see photo 4).

The following photographs demonstrate the engineering controls mentioned above.

### EXISTING ENGINEERING CONTROLS



**Photo 1**

View looking towards the eastern entrance to Building 38 (SWMU 11). This photo demonstrates that this entrance door to the building is secured with a chain and padlock, and contains a warning sign with a point of contact for the building.

**EXISTING ENGINEERING CONTROLS (Continued)**



**Photo 2**

View looking towards the western entrance to Building 38 (SWMU 11). This photo demonstrates that this entrance door to the building is secured with a chain and padlock, and contains a warning sign with a point of contact for the building.



**Photo 3**

Close-up view of the warning signs posted on the doors to Building 38 (SWMU 11). This sign demonstrates that access to the interior portion of the building is prohibited. The sign also presents the point of contact (Madeline Rivera) and telephone number.

## EXISTING ENGINEERING CONTROLS (Continued)



**Photo 4**

View looking towards the eastern side of Building 38 (SWMU 11). This photo demonstrates that the stair access leading to the upper level of Building 38 has been removed.

### **1.3 Conclusion**

This document demonstrates that there are existing engineering controls in place at SWMU 11 (Building 38), which will continued to be enforced until such time as a decision is made on the future of the building at NSRR. These engineering controls will be maintained so as to continue to prevent site access to workers and/or trespassers at this site.