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RESOURCE CONSERVATION AND RECOVERY ACT QUARTERLY PROGRESS REPORT  
FOR REPORTING PERIOD 1 OCTOBER 2013 THROUGH 31 DECEMBER 2013 NAVAL  
ACTIVITY PUERTO RICO  
12/31/2013  
CH2M HILL

# Naval Activity Puerto Rico, Ceiba Puerto Rico

## Reporting Period: October 1, 2013 through December 31, 2013

### Background

On March 31, 2004, the Naval Station Roosevelt Roads ceased operations and the Naval Activity Puerto Rico (NAPR) was established. The mission of NAPR is to protect the physical assets remaining, comply with environmental regulations, and sustain the value of the property until final disposal of the property. In 2006, the Navy and EPA entered into a RCRA 7003 Administrative Order on Consent (Consent Order), establishing the Navy's corrective action obligations, replacing the 1994 RCRA permit as the document identifying these obligations concerning NAPR.

### Work Completed

Work was performed at several sites on a number of tasks pursuant to the provisions of the Consent Order during the period between October 1, 2013 and December 31, 2013. The tasks completed are described in Table 1 corresponding to the site where the work was performed. Findings and summaries of laboratory data may be found in the documents cited in Table 1.

The intent of Table 1 is to describe the status of the sites currently under investigation or remediation under the Consent Order. Twenty three sites with Correction Action Complete were removed from Table 1 in this quarterly report.

### Changes Made

There were no changes made related to roles and responsibilities of the program team members during this reporting period.

### Public Meetings

RAB Meeting # 29 was held in Ceiba on November 5, 2013. Discussions held during the meeting focused on the current cleanup work being performed at various sites and plans for cleanup activities to be performed in the next 2 months.

Flyers were provided to the public in October, November and December. These flyers focus on the status of the cleanup program. The flyers will be posted on the Navy's BRAC Public Website:

[https://www.bracpmo.navy.mil/brac\\_bases/southeast/former\\_ns\\_roosevelt\\_roads.html](https://www.bracpmo.navy.mil/brac_bases/southeast/former_ns_roosevelt_roads.html)

### Problems Encountered

Vandalism of Navy and its contractor's remediation equipment has been minimal during this reporting period. However, vandalism continues to be a concern and the Navy is evaluating other alternatives to allow investigation and cleanup work to continue. Warning signs have been placed at various locations throughout NAPR.

### Projected Work for Next Reporting Period

The projected work and deliverables for the next reporting period (January 1, 2014 through March 31, 2014) is also described in Table 1.

### Reports Completed

Copies of daily reports, inspection reports, validated laboratory/monitoring data, etc. generated during the reporting period can be viewed in the reports listed in Table 1.

TABLE 1  
 SWMU/AOC Deliverable Status  
 October 1, 2013 through December 31, 2013  
 Naval Activity Puerto Rico

SWMU or Area of Concern	RFI Type	Status
#1 Former Cremator Disposal Site (UXO 2)	Full <sup>(1)</sup>	Final Debris Delineation Work Plan was submitted to EPA and PREQB on 11/5/13 and regulator acceptance was received. Final Debris Delineation Work Plan was submitted to the regulators on 11/5/13 and EPA accepted the work plan 12/18/2013. PREQB accepted the work plan on 12/2/2013 with additional notes for consideration which are being incorporated into the final work plan.
#2 Langley Drive Disposal Site	Full	No change. Final Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 was submitted on 5/16/13. PREQB provided approval in a letter dated 5/30/13. This document will be revisited once the changed site conditions are evaluated.
#3 Base Landfill	Full	The March 2012 report was approved by EPA on 7/18/2013 The September 2012 report EPA comments were received on 5/1/13. The Navy is responding to comments.  The March and September 2013 Pre-draft report are scheduled to be delivered February 2014 Next scheduled field event is March 2014. SWMU 3 landfill vegetation clearing and initial topographic survey completed. Began work on the landfill cap design.
#7 Tow Way Fuel Farm	Full	Continued operation and maintenance of product recovery system and MNA sampling and analysis. Draft SWMU 7/8 Monitored Natural Attenuation Report submitted to EPA and PREQB on June 21, 2013. Draft SWMU 7/8 Operations and Maintenance Report submitted to EPA and PREQB on June 21, 2013. White paper being developed to support discontinued passive system use to recover product. Will incorporate MNA data collected in September 2013 into the white paper.
#8 Tow Way Fuel Farm - Disposal Pits	Full	Combined with SWMU 7.
#9 Tank 212-217 Sludge Burial Pits	Full	Full RFI report will be revised to incorporate additional sediment characterization data. Work Plan Letter for collection of additional Sediment data was submitted to the EPA on 10/9/12; PREQB provided comments on 12/5/12 and EPA provided comments on 3/18/13. A response to comments and revised Work Plan Letter were submitted on 3/27/13. PREQB provided additional comments on 4/11/13 and a response to PREQB comments was submitted on 6/6/13. EPA approved the Work Plan Letter on 10/29/13 and PREQB provided an approval letter dated 11/22/13. The additional sediment sampling is scheduled for January 2014. Construction plans under development for removal of USTs.
#11 Old Power Plant/ Building 38	Full	No change. A Site Visit was conducted on 1/16/13 to better evaluate the conditions of the building and collect information to respond to regulator comments. A response to comments on the Draft Revised CMS Final Report including a recommendation to conduct an interim corrective measure at Building 11 was submitted on 5/29/13. EPA provided approval of the figure on 6/6/2013.
#14 Fire Training Pit Area	First Phase	EPA provided comments on the Draft CMS Final Report on 4/2/13. PREQB comments were forwarded to the Navy on 5/3/13. The Navy submitted a response to comments on 7/17/13 including a plan for pre-excavation delineation and groundwater characterization. EPA approved the Draft CMS on 8/9/2013. PREQB provided comments on 8/28/13. The Navy submitted a response to PREQB comments on 10/10/13; PREQB provided additional comments on 11/14/13. The pre-excavation delineation soil and sediment sampling and Phase 1 groundwater well installation and sampling was conducted in October and November 2013.
#27 Capehart WWTP Sludge Drying Beds	First Phase	The Draft ICM Work Plan for surface soil removal was submitted on 5/10/13. PREQB provided comments on 6/18/13

#28	Bundy WWTP Sludge Drying Beds		and EPA provided comments on 7/13/13. The Navy submitted a response to comments and a Revised Draft ICM Work Plan on 8/27/13. EQB provided comments on RTCs on 10/3/13. EPA provided comments on 2/4/14. However, this is outside of the date range for this report. Survey and marking of areas to be removed 8/1/2013 Permitting from PR OGP office for removal action 8/14/2013. Implementation of erosion controls. Removal and staging of contaminated soil. Sampling and waste profile 9/20/2013. Removed and staged 3,000 tons.
#29	Industrial Area WWTP Sludge Drying Beds		
#31	Waste Oil Collection Area/ Building 31 and 2022	First Phase	EPA approved draft construction completion report on 2/28/13. Navy submitted Final Report with EQB recommended edits on 6/20/13.
#32	PWD Storage Yard/ Battery Collection Area	First Phase	Combined with SWMU 31.
#45	PCB Spill Area/Old Power Plant	Full	No change. EPA and PREQB submit additional comments on 10/19/12 and 10/17/12, respectively. The Navy provided additional responses on 12/4/12, including an approach for fish tissue sampling. EPA and PREQB provided additional comments on 1/15/13 with the Navy responding on 3/11/13; PREQB submitted additional comments on 3/15/13 and EPA on 3/21 /13. A summary of discussion points on outstanding issues was submitted on 5/20/13. The Navy is addressing comments regarding the subsistence fishermen.
#54	Former NEX Repair/ Maintenance Shop/ Building 1914	First Phase	Security and infrastructure theft has delayed installation of groundwater sparge system. Continued quarterly groundwater monitoring of the site. EPA sent e-mail on 9/14/12 approving the SOB looked fine but wants to hold off public comment until all remedies are in place.
#55	TCE Plume near Tow Way Fuel Farm	Full	Planning for the first post system installation sampling. Preparing to install solar panel and recirculation pump fourth quarter.
#57	Facility No. 278 POL Drum Storage Area	Full	Concerning the draft Full RFI Report that included human health and ecological risk assessments, EPA responded with follow-on comments upon their review of the Navy's draft responses to comments (dated June 17, 2013). Subsequently, the Navy's response letter addressing the follow-on comments was e-mailed to EPA (and PREQB) for review on July 22, 2013. On 7/30/13 EPA submitted one follow up comment. On August 15, 2013, PREQB also responded with follow-on comments. The Navy's response letter addressing the follow-on comments was e-mailed to PREQB (and EPA) on August 30, 2013. PREQB submitted evaluation of RTCs on 11/13/13. Navy responding to EQB comments.
#59	Former Vehicle Maintenance & Refueling	First Phase	The Revised CMS Final Report was submitted to EPA and PREQB on 10/4/13. PREQB provided comments on 11/1/13. EPA comments are pending.
#60	Former Landfill at the Marina	Full	The Draft Full RFI Report was submitted on 6/28/13. PREQB provided comments on 10/3/13 and EPA provided comments on 11/26/13. The Navy is addressing comments.
#61	Former Bundy Area Maintenance Facilities	First Phase	No change. Field work for the Supplemental CMS Investigation was completed in February 2013.
#62	Former Bundy Disposal Area	First Phase	Draft Work Plan submitted on 9/19/2013 for regulatory review. PREQB provided comments on 10/3/13 and EPA provided input that they had no further comments on 1/24/14. The Navy is addressing PREQB comments.
#67	Former Gas Station	First Phase	Navy discussed responses to comments during meeting with regulators (EQB and EPA) on February 26, 2013. It was determined that the Navy will complete a geophysics investigation to determine whether a UST exists on the site. A draft work plan for completing the geophysical and cobalt sampling investigation was sent to the regulators for review on September 27, 2013. A comment regarding the addition of a sample at 7-9 feet deep was received from EPA on the work plan on November 26, 2013. The Navy agreed to take the additional sample; the Final Work Plan was submitted to EPA and EQB on December 10, 2013.
#68	Former Southern Fire Training Area	First Phase	Corrective Measures Implementation Complete
#69	Aircraft Parking Area	First Phase	A response to comments and the Final CMS Report were submitted on 4/26/13. PREQB provided additional comments on 6/18/13. EPA provided additional comments on 9/19/13. The Navy submitted additional responses and a Final CMS Report on 10/30/13. EPA approved the Final report on 10/31/13; however, PREQB provided

		additional comments on 11/21/13. The Navy is preparing responses and revisions to the CMS Report. An ICM Work Plan for soil removal was submitted on 5/31/13. EPA provided comments on 9/13/13 and PREQB provided comments on 9/18/13. The Navy submitted responses and a Revised ICM Work Plan on 10/30/13. EPA approved the Final report on 10/31/13; however, PREQB provided additional comments on 11/15/13. The Navy is preparing responses and a revised Draft ICM Work Plan.	
#70	Disposal Area Northwest of Landfill	Full	The Draft Full RFI Report was submitted on 9/11/13. PREQB provided comments on 11/22/13 and EPA provided comments on 12/5/13. The Navy is addressing comments.
#71	Quarry Disposal Site	Full	No change. A response to comments on the Letter Work Plan for Additional Sampling was submitted on 4/11/13. PREQB provided approval on 4/18/13. EPA accepted responses on 4/25/13.
#73	DRMO Scrap Metal Recycling ard	First Phase	The Corrective Measures Study is being conducted by the Department of the Army.
#74	SWMU 74 Fuel Pipelines and Hydrant Pits (Airfield Area) letter WP for additional sampling for completion of CMS report		Navy submitted work plan 10/22/12. EQB submitted comments on 11/29/12. EPA submitted comments on 3/20/13. Navy submitted RTCs on 6/4/13. EQB provided comments on 7/31/13. EPA reviewing.  Airfield Area-CMS Final Report-report preparation
#74	SWMU 74 Fuel Pipelines and Hydrant Pits (JP-5 Hill and DFM areas) Phase II of the CMS Investigation and CMS Final Report		Regulator comments received 2/28/12/ Navy submitted working draft RTCs on 7/30/12. EQB comments received 8/7/2012. EPA submitted comments on the draft Phase II CMS Investigation and on the Final CMS Report on 4/4/13. Navy submitted RTCs on 6/21/13. EQB submitted comments on 8/28/13. Navy submitted Work Plan letter for additional CMS Characterization on 7/18/13. EQB submitted comments on 8/15/13.
#74	SWMU 74 Pipeline and Hydrant Pits (Fueling Piers) Draft Phase II of the CMS investigation and CMS Final Report		Navy submitted 8/16/11. Regulator comments received 12/8/11. Navy submitted “Working Draft RTCs” on 6/22/12. Tim Gordon (USEPA Region II) approved working draft responses. EQB submitted comments on 8/7/12. EPA submitted comments on the Draft Phase II CMS investigation and the Final CMS Report on 4/4/13. Navy submitted RTCs on 6/21/13. EPA indicated RTCs were adequate on 7/30/13. EQB submitted follow-up comments on 8/28/13. Navy submitted responses to EQB comments on 11/25/13.
#74	SWMU 74 Fuel and Hydrant Pits (SWMU 9 Area A/B) Letter Work Plan for additional characterization		Navy submitted Work Plan letter for additional CMS investigation on 8/21/13. EQB submitted comments on 11/1/13. EPA submitted comments on 11/26/13. Navy responding to comments.
#64	SWMU 74 Fuel and Hydrant Pits (SWMU 9 Area C) Draft Phase II CMS Investigation and CMS Final Report		Navy submitted on 7/13/12. EQB comments received 9/25/12. EPA has no comments.10/5/12. Navy submitted Working Draft RTCs on 11/12/12/ EQB submitted comments on 12/7/12 to EPA and received by Navy on 5/3/13. Navy responding to EQB comments. EPA comments are pending.
#75	Building 803	First Phase	PREQB, EPA, and the Navy discussed the results of the groundwater data collected as part of the revised Phase I RFI on February 28, 2013. The Navy submitted a revised draft RFI Report to regulators on April 25, 2013. PREQB submitted comments on 7/3/13. EPA provided comments on 10/31/2013. The Navy responded to EQB comments on 12/23/2013.
#76	Building 2300	First Phase	The RFI is being conducted by the Department of the Army. EPA approved the document on 11/14/13.
#77	Small Arms Range and Possible Former Open Burning/ Open Detonation Areas (UXO 1)	Full	The draft Full RFI Report was submitted by Tetra Tech on September 19, 2013 for regulatory review. EQB submitted comments on 11/21/13. EPA submitted comments on 1/9/14 (after the December 31, 2013 cutoff date for this report)Navy responding to comments. The draft Interim Corrective Measures Work Plan, including the UFP-SAP for Confirmatory Sampling, was submitted to USEPA and PREQB on 12/12/2013.  USAE submitted confirmatory Sampling Draft SAP on 12/12/13. Regulators reviewing and comments are due 3/12/2014
#78	Pole Yard	First Phase	No change. A response to comments and a Revised Draft Full RFI Report were submitted on 4/30/13. PREQB provided approval of the responses on 5/1/13. EPA provided approval on 11/1/13.

#79 Cabras Island	First Phase	EPA and PREQB provided additional Phase I RFI comments on 5/16/13. A response to comments was submitted by the Navy on 8/9/13. EPA sent e-mail on 8/20/13 stating they had no further comments. PREQB sent response on 9/18/13 stating RTCs are accepted with the exception of 2 to be further evaluated. The RFI report will be updated when additional data and funding are available. Navy developing a work plan to complete additional sampling requested by EPA and PREQB.
#80 Drainage Ditch Near Building 207	First Phase	The Draft Phase I RFI Report for SWMU 80 was submitted on 4/11/13. PREQB provided comments on 5/31/13 and EPA provided comments on 6/6/13. A response to comments was submitted by the Navy on 8/6/13. The EPA indicated that the Navy's responses are adequate on 9/13/13. PREQB provided additional comments on 9/19/13. The Navy submitted a response to comments on 10/31/13. PREQB provided additional comments on 11/22/13. The Navy requested clarification from EPA on 12/17/13 with an informal response from EPA on 12/17/13. Formal EPA response is pending.
AOC E/Offshore Islands of Piñeros and Cabeza de Perro	First Phase	EQB comments were received on 10/8/12. EPA comments on the Draft UFP-SAP for Expanded Terrestrial Phase I RFI were received on 7/17/2013 A comment resolution conference call was held on 9/9/2013. A redline Draft Final UFP-SAP was submitted to USEPA and PREQB on 11/22/13.  PREQB comments received on the draft Underwater Phase I RFI Report on 5/14/2012. EPA comments received on 10/18/2012. Navy submitted response to comments on 11/30/2012. The EPA approved the response to comments on 12/12/2012. EQB submitted additional comments on 12/14/2012. Navy submitted response to comments on 4/17/2013. After discussions with EQB and Navy submitted revised response to comments on 8/19/2013.
AOC F/Monitored Natural Attenuation Sites 124, 731, 734, 2842E, 1738, 520, 735, and 1995		<p>Quarterly Reports:</p> <p>Yr 10 Qtr 1 Annual Report – Regulator comments regarding threshold values in Draft report will be addressed in 2014 revised SAP. Preparing Final document. Regulator comments were received on 2/5/2013</p> <p>Yr 10 Qtr 2 – Draft report shipped to regulators and Navy for review on 7/18/13. EPA submitted comments on 7/22/13 and EQB comments on 8/15/2013.</p> <p>Yr 10 Qtr 3 – Draft report scheduled to ship to regulators first week of January 2014.</p> <p>Yr 10 Qtr 4 – Navy is reviewing pre-draft report.</p> <p>Yr 11 Qtr 1 – Pre-draft is being finalized. Scheduled to ship to regulators first week of January 2014.</p> <p>Yr 11 Qtr 2 – Navy is reviewing pre-draft report.</p> <p>MTBE Investigation</p> <p>The Revised Final Site Characterization Report for Site 1738 was submitted to EPA on 1/4/13. PREQB provided comments on 3/15/13 and EPA provided comments on 4/2/13. A response to comments and revised report were submitted on 6/28/13. EPA provided approval on 7/22/13. PREQB provided additional comments on 10/4/13. The Navy submitted responses on 11/18/13. EPA provided additional comments on 11/21/13 and PREQB provided additional comments on 11/22/13. The Navy is addressing comments.</p> <p>AOC F Site 520</p> <p>A Work Plan Letter for NAPL Source Area Delineation for AOC F Site 520 was submitted on 8/2/13. EPA approved the letter work plan on 8/7/13. PREQB comments are pending.</p>

Revised Basewide Background Report		Report submitted 3/5/13. EPA submitted comments on 4/2/13. Pending receipt of comments from EQB.
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Notes

- (1) Full RFIs are conducted where releases were established during previous investigations. The purpose of the full RFI is to determine the nature, rate, direction, and extent of hazardous waste or hazardous constituents.
- (2) The purpose of the first phase RFI is to confirm any releases from these SWMUs and/or AOCs.