

N40003.AR.002560
PUERTO RICO NS
5090.3a

RESOURCE CONSERVATION AND RECOVERY ACT QUARTERLY PROGRESS REPORT
FOR 1 JANUARY 2014 THROUGH 31 MARCH 2014 NAVAL ACTIVITY PUERTO RICO
3/31/2004
CH2M HILL

Naval Activity Puerto Rico, Ceiba Puerto Rico Reporting Period: January 1, 2014 through March 31, 2014

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 January 1, 2014 and March 31, 2014. 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 # 30 was held in Ceiba on February 5, 2014. 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 few months. Meeting Minutes were distributed on March 22, 2014 and will be posted to the Navy's BRAC Public Website. The next RAB meeting is scheduled for May 7, 2014.

Flyers were provided to the public in January, February and March. These flyers provide a monthly update for projected field sampling activities. In addition, warning signs have been placed throughout NAPR for public awareness of locations of ongoing environmental investigations and cleanup.

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.

Projected Work for Next Reporting Period

The projected work and deliverables for the next reporting period (April 1, 2014 through June 30, 2014) is 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
 January 1, 2014 through March 31, 2014
 Naval Activity Puerto Rico

SWMU or Area of Concern	RFI Type	Status
#1 Former Cremator Disposal Site (UXO 2)	Full ⁽¹⁾	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. The final work plan is planned to be submitted during the next performance period. DGM is also planned to be conducted during the next performance period.
#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. Work will commence on evaluating the changed site conditions next period.
#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 Draft reports were submitted for regulatory review on February 18, 2014. SWMU 3 landfill vegetation clearing and initial topographic survey completed. Began work on the landfill cap. It is expected that delivery of cap material will begin next period.
#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. MNA data collected in September 2013 is currently being incorporated 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 was completed in January 2014. Preparation of a Revised Full RFI Report, incorporating the additional sediment data is underway. Construction plans under development for removal of USTs. Tanks will be demolished and removed starting the second quarter of 2014.
#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. EPA indicated no further comments on 1/24/14. PREQB provided additional comments on 2/19/14 and the Navy submitted a response on 3/19/14. PREQB approved the

		responses on the Draft CMS Final Report on 3/20/14. The Navy submitted the Draft Pre-excavation Delineation Sampling Report to EPA and PREQB on 3/19/14. Preparation of the Phase I Groundwater Characterization Letter Report is currently in progress.	
#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 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. PREQB provided comments on RTCs on 10/3/13. EPA provided comments on 2/4/14. The Navy submitted responses on 3/19/14. Survey and marking of areas to be removed 8/1/2013 Permitting from PR OGPe 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. The CMS is currently on hold.
#28	Bundy WWTP Sludge Drying Beds		
#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 PREQB recommended edits on 6/20/13.
#32	PWD Storage Yard/ Battery Collection Area	First Phase	Combined with SWMU 31.
#42	Water Purification Plant Lagoons	First Phase	Further evaluation is being completed to determine if there is a feasible action that could be undertaken to remove land use restrictions.
#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 Statement of Basis but wants to postpone the public comment until all remedies are in place. Groundwater monitoring will continue during the next performance period.
#55	TCE Plume near Tow Way Fuel Farm	Full	Conducted the first post system installation sampling.
#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 PREQB 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 provided comments on 1/28/14. The Navy is preparing responses.
#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 submitted responses on 3/12/14.
#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.

#67	Former Gas Station	First Phase	Navy discussed responses to comments during meeting with regulators (PREQB 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 PREQB on December 10, 2013. The geophysical investigation was completed the week of January 20, 2014. A UST was not identified during the geophysical investigation. After several attempts to obtain subsurface soil samples, only one sample at 5 feet could be obtained. The team plans to remobilize in June 2014 and collect subsurface soil samples using direct push technology for analysis of cobalt. Results of the geophysics investigation and the cobalt sampling will be incorporated in the Final Amended Phase I Report for SWMU 67.
#68	Former Southern Fire Training Area	First Phase	Corrective Measures Implementation Complete
#69	Aircraft Parking Area	First Phase	<p>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. PREQB 11/21/13 comments questioned institutional controls for background cobalt in groundwater – EPA, Navy, and PREQB currently resolving this comment.</p> <p>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 submitted responses on 1/27/14. PREQB provided additional comments on 3/3/14. The Navy submitted the Final ICM Work Plan on 3/26/14.</p>
#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. Navy submitted responses on 1/22/14. EPA provided additional comments on 2/12/14. The Navy will address the additional comments pending receipt of additional PREQB 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. PREQB submitted comments on 11/29/12. EPA submitted comments on 3/20/13. Navy submitted RTCs on 6/4/13. PREQB provided comments on 7/31/13. EPA provided approval on 3/17/14.
#74	SWMU 74 Fuel Pipelines and Hydrant Pits (JP-5 Hill and DFM areas) Phase II of the CMS Investigation and CMS Final Report		<p>Regulator comments received 2/28/12/ Navy submitted working draft RTCs on 7/30/12. PREQB 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. PREQB submitted comments on 8/28/13 and EPA provided comments on 2/7/14. The Navy submitted responses on 4/3/14.</p> <p>Navy submitted Work Plan letter for additional CMS Characterization on 7/18/13. PREQB submitted comments on 8/15/13. EPA provided approval on 2/10/14. The Navy is preparing responses to PREQB comments.</p>
#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 (EPA Region II) approved working draft responses. PREQB 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. PREQB submitted follow-up comments on 8/28/13. Navy submitted responses to PREQB comments on 11/25/13. PREQB provided additional comments on 1/7/14. The Navy is preparing responses to PREQB comments.

#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. PREQB submitted comments on 11/1/13. EPA submitted comments on 11/26/13. Navy responding to comments.
#74	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. PREQB comments received 9/25/12. EPA has no comments. 10/5/12. Navy submitted Working Draft RTCs on 11/12/12 PREQB submitted comments on 12/7/12 to EPA and received by Navy on 5/3/13. EPA indicated no additional comments on 3/18/14. Navy responding to PREQB comments.
#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 PREQB comments on 12/23/2013. EPA approved the document on 1/22/14. A Statement of Basis, documenting the no action remedy for the site will be prepared for regulatory review in April 2014.
#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. PREQB submitted comments on 11/21/13. EPA submitted comments on 1/9/14. Navy responding to comments. The draft Interim Corrective Measures Work Plan, including the UFP-SAP for Confirmatory Sampling, was submitted to EPA and PREQB on 12/12/2013. Regulatory review comments were 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. PREQB provided a response on 1/10/14 and EPA provided a response on 1/14/14 regarding the statistical background methodology. The Navy is preparing a response.
	AOC E/Offshore Islands of Piñeros and Cabeza de Perro	First Phase	PREQB 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 EPA 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. PREQB submitted additional comments on 12/14/2012. Navy submitted response to comments on 4/17/2013. After discussions with PREQB and Navy submitted revised response to comments on 8/19/2013.

<p>AOC F/Monitored Natural Attenuation Sites 124, 731, 734, 2842E, 1738, 520, 735, and 1995</p>		<p>Quarterly Reports: 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 8/2/2013 Yr 10 Qtr 2 – Draft report shipped to regulators and Navy for review on 7/22/13. EPA submitted comments on 7/22/13 and PREQB comments on 8/15/2013. Yr 10 Qtr 3 – Draft report distributed for regulatory review on 1/10/2014. Yr 10 Qtr 4 – Draft report distributed for regulatory review on 2/11/14. Yr 11 Qtr 1 Annual Report – Draft report distributed for regulatory review on 2/11/2014. Yr 11 Qtr 2 – Draft report distributed for regulatory review on 2/11/14. Yr 11 Qtr 3 – Distribution for regulatory review scheduled the first week of April. Yr11 Qtr 4 - Sampling event was conducted on March 24, 2014. MTBE Investigation 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 submitted responses on 2/6/14. PREQB approved responses except for comments 1, 26a and 28, which were deferred to EPA for feedback. AOC F Site 520 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>
<p>Revised Basewide Background Report</p>		<p>Report submitted 3/5/13. EPA submitted comments on 4/2/13. Pending receipt of comments from PREQB.</p>
<p>Monthly Flyers for field planning</p>	<p>Miscellaneous</p>	<p>Completed and distributed in January, February, and March</p>
<p>RAB #30 Meeting Minutes</p>	<p>Miscellaneous</p>	<p>Completed March 30, 2014</p>

Notes

- (1) Full RFI's 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.