



***RCRA § 7003 ADMINISTRATIVE
ORDER ON CONSENT
QUARTERLY PROGRESS REPORT
November 1, 2010 – January 31, 2011***



***For NAVAL ACTIVITY PUERTO RICO
EPA I.D. No. PR2170027203
CEIBA, PUERTO RICO***



Prepared for:

**Department of the Navy
NAVFAC SOUTHEAST**
North Charleston, South Carolina



Prepared by:

Baker

Michael Baker Jr., Inc.
Moon Township, PA

Contract No. N62470-10-D-3000
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**IQC for A/E Services for Multi-Media Environmental Compliance
Engineering Support**

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INTRODUCTION

This quarterly report is comprised of the following separate sections:

1. Work Completed - A description of activities conducted, pursuant to the provisions of the Corrective Action portion of the Resource Conservation and Recovery Act (RCRA) 7003 Administrative Order on Consent, during the reporting period.
2. Summary of Findings - A brief summary of corrective action related findings developed during the reporting period.
3. Summary of Changes - A brief summary of any changes made in the corrective action program.
4. Community Relations Summary - A brief summary of any contacts made with the local community or interested groups during the reporting period.
5. Problems Encountered/Response Taken - A brief summary of problems or conditions that caused a response to be made in the corrective action program.
6. Personnel Changes - Personnel changes made during the period.
7. Planned Work - A list of tasks planned for the next period.

Each section includes a separate list of contents and separate attachments as necessary and appropriate.

SECTION 1
WORK COMPLETED

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.

Work was performed on a number of tasks related to the corrective action portion of former Naval Station Roosevelt Roads (NSRR) RCRA 7003 Administrative Order on Consent. Tasks, which were commenced, worked on, or completed this period, November 1, 2010 – January 31, 2011, include:

- Work continued on adding data to the Naval Activity Puerto Rico RCRA Corrective Action Program web sites.
- Continued measurement of product thickness at SWMU 7/8.
- Performed groundwater MNA sampling at SMWU 7/8.
- Continued monitoring the effectiveness of the EOS pilot injection at SWMU 54.
- Continued monitoring the effectiveness of the permanganate pilot injection at SWMU 55.
- SWMU 1 Preparation of the draft Health and Safety Plan (HASP)/Accident Prevention Plan (APP), internal to the Navy, was initiated.
- A Phase I RFI was conducted at AOC E - Pineros and Cabeza de Perro Island.
- On November 1, 2010 the Navy requested an EPA extension until December 17, 2010 for the SWMU 61 Draft CMS Report.
- The AOC F MNA Year 8 Quarter 3 sampling event was initiated on November 1, 2010.
- On November 5, 2010 the Final Full RCRA Facility Investigation Work Plan for SWMU 70 was submitted to the EPA in accordance with EPA comments dated September 16, 2010.

- The RCRA Quarterly Progress Report for the period August 1, 2010 through October 31, 2010 was submitted to the EPA on November 23, 2010.
- Naval Ordnance Safety and Security Activity (NOSSA) comments on the Explosive Safety Submission (ESS) for SWMU 1 were resolved and the document was forwarded to the Department of Defense Explosive Safety Board (DDESB) on November 24, 2010.
- On November 24, 2010 the following reports were submitted to the EPA in accordance with EPA comments dated October 7, 2010:
 - 1) The Final Phase I RCRA Facility Investigation for SMWU 57.
 - 2) The Final Phase I RCRA Facility Investigation Work Plan for SWMU 80.
- On December 7, 2010 the Navy response to EPA comments dated July 8, 2010 (in accordance with EPA comments dated May 27, 2010) on the Draft Full RCRA Facility Investigation for SWMU 9 were found to be acceptable. The EPA requested that Additional Characterization Sampling at SWMU 9 be initiated no later than January 7, 2011.
- On December 9, 2010 the Draft Sampling and Analysis Plan for On-Site Construction Support for Debris Removal for SWMU 1 was submitted to the EPA.
- The Draft Work Plan to Conduct Phase I RCRA Facility Investigation, Addendum No.2 – Underwater Intrusive Investigation, Piñeros and Cabeza de Perro Islands was submitted for regulatory review on December 13, 2010.
- The following were submitted to the EPA on December 15, 2010:
 - 1) The Draft Semi-Annual Groundwater Monitoring Report SWMU 3 – Former Solid Waste Landfill, September 2010 Sampling Event
 - 2) The Final Phase I RFI Work Plan for SWMU 79 was submitted to the EPA

in accordance with EPA comments dated October 7, 2010

- On December 15, 2010 the Navy received an EPA comment letter dated December 8, 2010 regarding:
 - 1) Draft AOC F - Year 8 Annual Report
 - 2) SWMU 7/8 Draft Work Plan Monitored Natural Attenuation Groundwater Sampling
 - 3) SWMU 7/8 Draft Corrective Measures Implementation Plan
 - 4) Draft Full RFI Report for SWMU 9 – Area B, Tank 214 Area Response to Comments and Proposal for Additional Sampling.
 - 5) Draft Phase I RFI Report for SWMU 75.

- On December 16, 2010 the Draft Corrective Measures Study Work Plan for SWMUs 27, 28, and 29 was submitted to the EPA in accordance with EPA comments dated July 23, 2008.

- The Draft Final Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 was submitted to the EPA on December 16, 2010 in accordance with EPA comments dated October 14, 2010.

- On December 17, 2010 the Draft Final Corrective Measures Study Final Report for SWMU 45 was submitted to the EPA in accordance with EPA comments dated October 14, 2010.

- On December 22, 2010, received comments from the DDESB on the ESS for SWMU 1 and were resolved with NOSA by January 3, 2011.

- On December 30, 2010 the Draft Monitored Natural Attenuation – AOC F Year 8 Quarter 3 Report was submitted to the EPA in accordance with the schedule in the Revised Final II Monitored Natural Attenuation Work Plan, AOC F.
- Work for SMWU 68 soil removal began January 2011.
- On January 5, 2011 the Final Design Package for Interim Corrective Measures for SWMU 2, including the Final Basis of Design, Final Design Drawings, and Final Technical Specifications were submitted to the EPA in accordance with EPA comments dated October 14, 2010.
- The Additional Sampling Investigation for SWMU 9 – Area B, Tank 214 Area was initiated on January 5, 2011.
- On January 10, 2011, received and began addressing advanced copy of PREQB comments via email on the Phase I RCRA Facility Investigation Report for SWMU 77 – Small Arms Range.
- DDESB’s approval on comments on the ESS for SWMU 1 was confirmed by NOSSA on January 10, 2011 and the associated letter is expected shortly.
- On January 12, 2011 a wetland delineation was performed for the area adjacent to SWMU 68 in anticipation of soil removal activities.
- The Draft MtBE Investigation Report AOC F – Site 1738 was submitted to the EPA on January 27, 2011.
- On January 31, 2011 the following were submitted to the EPA:
 - 1) The Draft Final Corrective Measures Study Addendum for SWMU 55.
 - 2) The Draft Final Corrective Measures Implementation Plan for SWMU 55.
 - 3) The Amended Final Sampling and Analysis Plan for the Pilot Test at SWMUs 54 and 55.

Each of these items is discussed in detail in the numbered sections, which follow.

1. Corrective Action Activities Status

Table 1-1 (provided at the end of this section) provides a brief update of Corrective Action activities for each SWMU or Area of Concern (AOC). This table was first used as part of a presentation made at the October 1997 Joint Interest Group (JIG) meeting. The group decided that the table would be a valuable addition to the quarterly report. This table continues to be updated and included in this report as a result of the JIG decision.

2. Reporting Activities

- Develop the SWMU 54 Benzene Plume CMS Addendum.
- Develop the SWMU 54 Benzene Plume CMI Work Plan.
- Develop the SWMU 55 TCE Plume CMI Work Plan.
- On November 5, 2010 the Final Full RCRA Facility Investigation Work Plan for SWMU 70 was submitted to the EPA in accordance with comments dated September 16, 2010.
- On November 23, 2010 the RCRA Quarterly Report for the period August 1, 2010 – October 31, 2010 was submitted to the EPA.
- On November 24, 2010 the Final Phase I RCRA Facility Investigation for SWMU 57 was submitted to the EPA in accordance with EPA comments dated October 7, 2010.
- The Final Phase RCRA Facility Investigation Work Plan for SWMU 80 was submitted to the EPA on November 24, 2010 in accordance with EPA comments dated October 7, 2010.

- On December 9, 2010 the Draft Sampling and Analysis Plan for On-Site Construction Support for Debris Removal for SWMU 1 was submitted to the EPA review.
- The Draft Work Plan to Conduct Phase I RCRA Facility Investigation, Addendum No.2 – Underwater Intrusive Investigation, Piñeros and Cabeza de Perro Islands was submitted for regulatory review on December 13, 2010.
- The Draft Semi-Annual Groundwater Monitoring Report SWMU 3 – Former Solid Waste Landfill Facility September 2010 Sampling Event was submitted to the EPA on December 15, 2010.
- On December 15, 2010 the Final Phase I RFI Work Plan for SWMU 79 was submitted to the EPA in accordance with EPA comments dated October 7, 2010.
- On December 16, 2010 the Draft Corrective Measures Study Work Plan for SWMUs 27, 28, and 20 was submitted to the EPA in accordance with EPA comments dated July 23, 2008.
- The Draft Final Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 was submitted to the EPA on December 16, 2010 in accordance with EPA comments dated October 14, 2010.
- On December 17, 2010 the Draft Final Corrective Measures Study Final Report for SWMU 45 was submitted to the EPA in accordance with EPA comments dated October 14, 2010.
- On December 30, 2010 the Draft Monitored Natural Attenuation – AOC F Year 8 Quarter 3 was submitted to the EPA in accordance with the schedule in the Revised Final II Monitored Natural Attenuation Work Plan AOC F.
- On January 27, 2010 the Draft MtBE Investigation Report AOC F – Site 1738 was submitted to the EPA.

- Submitted the Draft SWMU 55 CMI for EPA review on January 31, 2011.
- Submitted the Draft SWMU 55 CMS Addendum for EPA review on January 31, 2011.

3. Tow Way Fuel Farm

There were efforts undertaken at the Tow Way Fuel Farm in three general areas. Each of these areas is discussed below.

Corrective Measures Study

The initial Corrective Measures Study (CMS) Task I report for the Tow Way Fuel Farm was submitted November 30, 1998. EPA comments were received March 15, 1999 (March 8 letter). Based on the comments, an addendum report was provided April 21, 1999, which significantly revised the clean up levels. Comments on the revised Section 3.0 (the clean-up goal development section) were transmitted in an EPA letter of June 30, 1999. The clean-up goals were revised and the Revised Draft CMS Task I Report for the TWFF was submitted January 21, 2000. Comments on the Revised Draft CMS Task I Report for the TWFF were issued on May 4, 2000. A response to these comments was submitted on June 29, 2000. Comments on the Navy's response to EPA's comments dealing with the CMS Task I Report for the TWFF were issued October 10, 2000. A response to these comments was submitted on November 8, 2000. A meeting to discuss the TWFF CMS was conducted at the EPA Region II Offices in New York City on December 19, 2000. The final meeting minutes from the TWFF CMS meeting was submitted on January 19, 2001. On January 31, 2001, the Navy submitted the Revised Section 3.0 of the Task I CMS Report. Also submitted on January 31, 2001, was the Draft Work Plan for Additional Data Collection at the TWFF. This report is in response to the December 19, 2000 meeting held at the EPA Region II Offices in New York City. Comments on the Revised Section 3.0 of CMS Task I Report for TWFF and the work plan for Additional Data Collection, TWFF were issued on May 4, 2001. Appendix B for the Revised Section 3.0 of the Task I CMS TWFF was submitted on June 13, 2001. The Draft Final Work Plan for Additional Data Collection for SWMU 7/8 was submitted on July 6, 2001. Comments on the Draft Final Additional Data Collection

Work Plan were issued on August 8, 2001. The Final Work Plan for Additional Data Collection at the TWFF was submitted on September 26, 2001. A Draft Work Plan for Ecological Risk Assessment (ERA) for SWMU 7/8 was also submitted on September 26, 2001. A revision to the work plan was submitted on November 2, 2001. On November 21, 2001 the EPA approved the Additional Data Collection and ERA Work Plans. EPA requested a revised schedule for implementing the CMS at the TWFF. A revised CMS schedule for the TWFF was submitted on December 5, 2001. EPA approved the revised schedule January 3, 2002. The additional data collection field investigation was initiated on January 6, 2002 and completed on March 14, 2002. A proposed revision to the proposed corrective measure schedule for the TWFF was submitted on March 26, 2002. The Draft Final CMS Task I Report for the TWFF was submitted on July 9, 2002. Included as appendices, within the Task I Report were the Draft Additional Data Collection Investigation Report and the Draft Groundwater Model for the TWFF. EPA comments on the Draft Final CMS Task I Report were provided in a letter dated October 24, 2002. An addendum to this report was submitted on January 6, 2003. Replacement pages for the addendum, as well as responses to EPA's comment letter dated October 24, 2002 were submitted on January 8, 2003. EPA comments on the Draft Final CMS Task I Report, as well as the Navy responses to EPA comments dated October 24, 2002 were provided in a letter dated March 13, 2003. Replacement pages for the Revised Draft Final CMS Task I Report, as well as for the Draft Final Additional Data Collection Investigation Report were submitted April 22, 2003. The Navy responses to EPA comment letter dated March 13, 2003 was also submitted on April 22, 2003. The Draft TCE Plume Source Delineation Work Plan for the TWFF was submitted on May 8, 2003. Replacement pages for the Final CMS Task I Report were submitted on May 23, 2003. The Navy responses to EPA comment letter dated April 22, 2003 was also submitted on May 23, 2003. EPA approval on the Final CMS Task I Report for the TWFF was provided in a letter dated June 10, 2003. EPA also commented on the Draft TCE Plume Source Delineation Work Plan for the TWFF. The Final TCE Plume Source Delineation Work Plan for the TWFF was submitted on July 25, 2003. The Navy responses to EPA comments on the Draft TCE Plume Source Delineation Work Plan dated June 10, 2003 was submitted on August 11, 2003. The fieldwork associated with the Final TCE Plume Source Delineation Work Plan was initiated September 12, 2003 and completed September 28, 2003. The Draft CMS Final Report for the TWFF was submitted on November 24, 2003. The Draft TCE Plume Delineation and Source Investigation Report for the TWFF were submitted on January 21, 2004. EPA commented on the Draft CMS Final

Report and the Draft TCE Plume Delineation and Source Investigation Report in a letter dated January 30, 2004 and February 24, 2004, respectively. The EPA requested in their February 24, 2004 comment letter that the potential source area and associated TCE Plumes at the TWFF is designated as SWMU 55. On March 5, 2004 the Navy changed the designation of the TCE Plume site to SWMU 55, thus creating a new IR program site. The Navy submitted preliminary responses to EPA's January 30, 2004 comment letter on March 5, 2004. A conference call was held on March 22, 2004 between the Navy and EPA to discuss the Navy's preliminary response to comments. On April 6, 2004, the Navy submitted a letter to the EPA regarding the EPA's comments dated January 30, 2004. The replacement pages constituting the Draft Final CMS Final Report for the TWFF were submitted on November 8, 2004. The Navy responses to EPA comment letter dated January 30, 2004 were also submitted on November 8, 2004. EPA commented on the Draft Final CMS Final Report in a letter dated January 7, 2005. The Navy submitted draft responses to the EPA January 7, 2005 comment letter via e-mail on February 14, 2005. The EPA provided comments on the draft responses dated February 14, 2005 on March 11, 2005 via e-mail. On March 15, 2005 the Navy requested that a conference call be held between EPA, BAH, Baker and the Navy to discuss EPA comments and Navy Responses on the TWFF and SWMUs 54 and 55 CMS Final Reports. The conference call was conducted on March 17, 2005 with Revised Navy draft responses to comments submitted to the EPA via e-mail on March 23, 2005. The EPA responded back to the revised draft responses on April 5, 2005. The Navy official responses to EPA comments dated January 7, 2005 were submitted April 8, 2005. The EPA submitted a response letter on July 19, 2005, stating that the EPA completed the review of the Navy's April 8, 2005 responses to EPA's January 7, 2005 comments and has determined that the responses are acceptable. The Navy has initiated work to incorporate the responses into the Final CMS Final TWFF report. The TWFF Quarterly Progress Report #34 for the period of May 1, 2005 through July 31, 2005 was submitted to the EPA on August 10, 2005. The Navy comments on the Final CMS Final Report for the TWFF were submitted to Baker on August 24, 2005. Baker revised the document and the Final CMS Final Report was submitted to the EPA for review and comment on August 26, 2005. EPA commented on the document in a letter dated October 13, 2005. The TWFF Quarterly Progress Report #35 for the period of August 1, 2005 through October 31, 2005 was submitted to the EPA on November 16, 2005. The Navy responded to EPA comments dated October 13, 2005 on November 22, 2005. These comments addressed the Final Corrective Measures Study Final Report for the Tow Way

Fuel Farm dated August 29, 2005. This letter also approved the Final Corrective Measures Study Final Report for SWMUs 54 and 55 dated August 29, 2005. The Revised Final CMS Final Report for the Tow Way Fuel Farm was submitted to the EPA on November 22, 2005. The Draft Statement of Basis for the Tow Way Fuel Farm was submitted to the EPA on March 20, 2006. Comments were received from EPA on the Draft Statement of Basis on March 22, 2006. The Revised Draft Statement of Basis for the Tow Way Fuel Farm was submitted to the EPA on March 30, 2006. EPA comments on the Revised Draft Statement of Basis were received on April 3, 2006. The Final Statement of Basis for the Tow Way Fuel Farm was submitted to the EPA on April 11, 2006. The SWMU 7/8 Soil CMS Addendum was submitted to EQB and EPA on March 10, 2010 with regulatory comments received June 28, 2010. Responses to the regulatory comments, revised Statement of Basis, and Revised CMS Addendum were provided to EPA September 3, 2010.

Corrective Measures Implementation

The Corrective Measures Implementation (CMI) for the Tow Way Fuel Farm began in June 2009. The project plans for implementation of the corrective measure have been approved by the Navy.

The Navy and its contractors are addressing regulatory comments on the Draft Corrective Measures Implementation Plan and Draft SWMU 7/8 MNA Work Plan received December 16, 2010. Product thickness in the recovery wells have been measured periodically and continues to range from below 0.01 feet to over 10 feet. MNA wells within the dissolved plume area have been sampled quarterly starting in May 2010 for monitored natural attenuation parameters following the Draft SWMU 7/8 MNA Work Plan. The groundwater remedy path forward includes addressing regulatory comments and submitting the final SWMU 7/8 Groundwater CMI Work Plan and installation and operation of the final product recovery system.

4. Joint Interest Group

It should be noted that the JIG has been replaced with the BCT which held its first meeting on June 14 and 15, 2006 at the PR EQB offices in San Juan, PR.

5. Site Management Plan (SMP)/Website Development

The SMP for Naval Activity Puerto Rico dated August 8, 2003 is located on the RCRA Corrective Action Program team website and in the Administrative Record.

Work continued on updating the Naval Activity Puerto Rico RCRA Corrective Action Program team website. This internet available resource contains program reports, schedules, Project Geographic Information System (GIS), and other project information. The website is password protected to limit access to the BCT members. The website is currently up and running, and is continuing to be updated.

The NAPR public website is currently up and running. This internet available resource was set up by the Navy to provide the public with information about the Installation Restoration Program at NAPR, as well as to encourage public participation in the clean-up process. The URL for this website is www.nsrir.org.

6. Corrective Measure Studies (other than the Tow Way Fuel Farm)

Comments on the streamlined CMS for SWMU 13 and SWMU 46/AOC C were received in an EPA letter dated July 27, 1999. Response to these comments along with the Final CMS Report was submitted on September 30, 1999. Comments on the Draft Final CMS Final Report for SWMU 13 and SWMU 46/AOC C were received in an EPA letter dated December 10, 1999. A response to EPA comments was submitted January 13, 2000. The Revised Final CMS Final Report for SWMU 13 and SWMU 46/AOC C was submitted on January 26, 2000. Comments on this report were received in an EPA letter dated March 15, 2000. Response to these comments was submitted in a Navy letter on May 30, 2000. The Draft Corrective Measures Implementation (CMI) Work Plan Design Package for SWMUs 13 and 46/AOC C were submitted on July 10, 2000. The Revised Final II CMS Final Report for SWMU 13 and SWMU 46/AOC C was submitted on August 4, 2000. Comments on this report and the Draft CMI Work Plan Design Package were received in an EPA letter dated September 15, 2000. The CMS stage of the investigation has now been approved. A response to EPA comments as well as the Final CMI Work Plan Design Package was submitted on November 3, 2000 for SWMUs 13 and 46/AOC C. Comments on this report were received in an EPA letter dated December 5, 2000. The 100% Final CMI Work Plan Design Package for SWMUs 13 and 46/AOC C was submitted on January 25, 2001. Responses to the December 5, 2000 EPA comment letter was submitted on January 26, 2001. EPA approved the 100% Final CMI Work Plan Design Package for

SWMUs 13 and 46/AOC C in an EPA letter dated May 4, 2001. A Navy letter was submitted to the EPA on January 12, 2005 indicating that the Navy intends to pursue the performance of the CMI at SWMUs 13, and 46/AOC C. The letter indicated that the Navy understands that EPA will not be able to make a final determination on these sites until the public review process is complete. The corrective measures for SWMU 13, and 46/AOC C was initiated in April 2006. The Navy submitted the Proposed Airfield Schedule to EPA on December 3, 2008 including the completion of remedial activities at SWMU 13. Additional excavation and backfill was initiated on January 12, 2009. The Navy submitted a letter to the EPA on January 21, 2009 indicating that the Navy has completed all actions required to address releases from SWMU 13 within Sale Parcel III. The EPA will concur subject to an acceptable final report documenting the completion of all required corrective measures at SWMU 13 as stated in EPA comment letter January 27, 2009.

Draft CMS Work Plans for SWMUs 1 and 2 and SWMU 45 were submitted on April 1, 1999. Comments on the work plans were received in an EPA letter dated August 11, 1999. The Final CMS Work Plans for SWMUs 1 and 2, and SWMU 45 were submitted on October 29, 1999. Comments on these work plans were received in an EPA letter dated January 20, 2000. A conference call discussing these comments was conducted on February 10, 2000. Response to these comments was submitted in a Navy letter on February 23, 2000. The Revised Final CMS Work Plans for SWMUs 1 and 2, and SWMU 45 were submitted on March 10, 2000. Comments on the work plans were received in an EPA letter dated May 4, 2000. Response to these comments was submitted in a Navy letter on July 13, 2000. The Revised Final II CMS Work Plans for SWMUs 1 and 2, and SWMU 45 were submitted on July 14, 2000. Comments on this report were received in an EPA letter dated September 15, 2000. Response to these comments was submitted in a Navy letter on October 19, 2000. EPA approved the Navy's October 19, 2000 response to comment letter in an EPA letter dated May 4, 2001. The Navy submitted Screening-Level Ecological Risk Assessment Problem Formulation and Additional Data Collection Work Plan for SWMUs 1, 2, and 45 on July 2, 2001. Comments on this report were received in an EPA letter dated October 4, 2001. An Addendum to the Draft Screening Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate for SWMUs 1, 2, and 45 was submitted on May 14, 2003 and May 22, 2003, respectively. The Navy responses to EPA comment letter dated October 4, 2001 was also submitted with these two submissions. Comments on the Addendum to the Draft Screening Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate for SWMUs 1, 2, and 45, were received in an EPA letter dated June 10, 2003. The fieldwork associated with these sites was initiated July 23, 2003 and completed August 8, 2003. The Draft Additional Data Collection Report and Screening Level

Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment at SWMU 45 was submitted on January 30, 2004. The Draft Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment at SWMUs 1 and 2 was submitted on February 13, 2004. EPA commented on these reports in a letter dated April 9, 2004. The Navy preliminary response to EPA Region II comment letter dated April 9, 2004 was submitted via e-mail on May 21, 2004. The Navy also submitted a letter to the EPA on June 2, 2004, confirming the proposed date for the Navy's official response to EPA comment letter dated April 9, 2004. Comments on the Navy's preliminary response to comments were received via e-mail dated June 11 2004. A conference call to discuss the Navy's preliminary response to comments and the additional EPA comments was conducted on June 21, 2004. The Navy submitted via e-mail, a revised response to EPA comment letter dated April 9, 2004 on July 9, 2004. EPA approved the Navy's revised response to comments in an e-mail dated July 16, 2004. The Navy submitted a formal response to EPA comment letter dated April 9, 2004, including the Additional Data Collection Effort Work Plan on July 23, 2004. EPA commented on the Navy's July 23, 2004 response to comment letter and Additional Data Collection Effort Work Plan in a letter dated August 20, 2004. Response to these comments, including the Final Additional Data Collection Effort Work Plan, was submitted on September 9, 2004. A correction to the Additional Data Collection Effort Work Plan was submitted on September 16, 2004. The Draft Final Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment at SWMU 45 was submitted on September 22, 2004. A Navy letter was submitted to the EPA on January 12, 2005 providing a revised schedule for ecological work for SWMUs 1, 2 and 45. EPA submitted a comment letter on July 13, 2005 addressing SWMUs 1 and 2 and SWMU 45 Draft Final Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of the BERA. The EPA determined that the responses for SWMUs 1, 2, and 45 were not fully acceptable as discussed in a Technical Review. A revised response letter was requested by EPA. A conference call was held on August 24, 2005 between EPA, Navy, BAH, and Baker to discuss the EPA comments dated July 13, 2005. This tele-con was to discuss SWMUs 1 and 2 and SWMU 45. Responses to EPA's comments dated July 13, 2005 on the Navy's June 17, 2005 Preliminary Responses to EPA's comments on the SWMUs 1 and 2 Draft Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA were submitted to the EPA on September 9, 2005. The Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 45 was submitted to the EPA for review and comment on April 20, 2006. The EPA provided comments on the Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 45 on June 22, 2006. The Final Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 45 was submitted to the EPA on

July 26, 2006. The EPA approved the Final Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 45 on August 17, 2006. The Baseline ERA field investigation (Step 6) for SWMU 45 was completed on February 2, 2007. The Draft Steps 6 and 7 of the Baseline ERA Report for SWMU 45 was submitted to the EPA for review and comment on February 26, 2008. The EPA provided comments on the Draft Steps 6 and 7 of the Baseline ERA Report for SWMU 45 on May 13, 2008. The Navy provided responses to these comments on July 11, 2008 along with the submission of the Final Steps 6 and 7 of the Baseline ERA Report for SWMU 45. An addendum to the Final Steps 6 and 7 of the Baseline Ecological Risk Assessment and the Navy Responses to EPA Comments dated October 3, 2008 were submitted to the EPA on November 21, 2008. The EPA approved this document in a letter dated January 15, 2009. The SWMU 45 Draft CMS Report was submitted to the EPA on July 22, 2010. The EPA provided comments on the Draft CMS in a letter dated October 14, 2010. The Draft Final CMS Report for SWMU 45 was submitted to the EPA on December 17, 2010 in accordance with the EPA comments dated October 14, 2010.

The Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA at SWMUs 1 and 2 was submitted to the EPA for review and approval on May 18, 2006. EPA issued a comment letter dated June 22, 2006 approving the Final Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of the Baseline Ecological Risk Assessment at SWMUs 1 and 2, Naval Activity Puerto Rico dated May 18, 2006. The letter also provided comments on the Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 45, Naval Activity Puerto Rico dated April 20, 2006. On July 26, 2006, The Final Steps 3b and 4 of the Baseline ERA for SWMU 45 was submitted to the EPA for review and approval. Also submitted with this document was the Navy Responses to EPA's June 22, 2006 comments on The Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 45. The EPA provided preliminary approval of the Final Steps 3b and 4 of the Baseline Ecological Risk Assessment SWMU 45 via e-mail on August 15, 2006 and the field verification for the SWMU 45 ecological risk assessment was initiated on September 18, 2006. The Draft Steps 3b and 4 of the Ecological Risk Assessment at SWMUs 1 and 2 was submitted to the EPA for review and approval on September 29, 2006. EPA comments dated June 22, 2006 on the Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMUs 1 and 2 were received on June 26, 2006. Navy submitted responses to EPA comments dated June 22, 2006 on July 26, 2006. The Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMUs 1 and 2 was submitted to the EPA on September 29, 2006. EPA comments dated December 8, 2006 on the Final Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMUs 1 and 2 were received on December 13, 2006. The Final Steps 3b and 4 of

the Baseline Ecological Risk Assessment for SWMUs 1 and 2 was submitted to the EPA on January 10, 2007. The EPA approved the Final Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMUs 1 and 2 in their letter dated February 13, 2007. The Baseline ERA field investigation (Step 6) for SWMUs 1 and 2 was initiated April 27, 2007. The field work associated with the SWMUs 1 and 2 Baseline ERA was completed on May 23, 2007. The data validation reports for SWMUs 1 and 2 toxicity testing samples were received on May 13, 2008. The Draft Steps 6 and 7 of the baseline ERA for SWMU 1 was submitted to the EPA on July 1, 2009. The EPA provided comments on the Draft BERA report in their letter dated September 17, 2009. The Draft Step 6 and 7 of the baseline ERA for SWMU 2 was submitted to the EPA on December 4, 2009. The Final Steps 6 and 7 of the Baseline Ecological Risk Assessment for SWMU 1 was submitted to the EPA on April 5, 2010. The EPA provided comments on the Final SWMU 1 BERA report in their letter dated May 27, 2010. On December 16, 2010 the Draft Final Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 was submitted to the EPA in accordance with EPA comments dated October 14, 2010. The Final Design Package for Interim Corrective Measures for SWMU 2, including the Final Basis of Design, Final Design Drawings, and Final Technical Specifications were submitted to the EPA in accordance with EPA on January 5, 2011 in accordance with EPA comments dated October 14, 2011.

A Draft CMS Work Plan for SWMU 6/AOC B was submitted on January 7, 2000 in response to the EPA comment letter dated November 5, 1999. The Draft CMS Work Plan for SWMU 6/AOC B was approved in an EPA letter dated March 15, 2000. Response to these comments was submitted in a Navy letter on May 30, 2000. The Draft CMS Final Report for SWMU 6/AOC B was submitted on May 30, 2000. Comments on the report were received in an EPA letter dated July 5, 2000. Response to these comments was submitted in a Navy letter on August 22, 2000. The Draft Final CMS Final Report for SWMU 6/AOC B was submitted on November 30, 2000. Comments on the Draft Final CMS Final Report were received in an EPA letter dated May 4, 2001. The Final CMS Final Report for SWMU 6/AOC B, as well as the response to EPA comment letter dated May 4, 2001, was submitted on June 21, 2001.

A Draft CMS Work Plan for SWMU 9 was submitted on July 14, 2000 in response to the EPA comment letter dated May 4, 2000. Comments on this work plan were received in an EPA letter dated September 15, 2000. A conference call was conducted on September 27, 2000 to discuss the EPA and BAH comments (dated September 15, 2000) on the Draft CMS Work Plan for SWMU 9. A conference call was conducted on October 16, 2000 to discuss the Navy draft responses to EPA

comments (dated 9/15/00) submitted October 10, 2000. On October 20, 2000 the Navy provided the EPA a listing of chemicals to be evaluated for SWMU 9 as discussed during the October 16, 2000 conference call. On October 24, 2000 the EPA commented on the site related chemicals for SWMU 9. On October 27, 2000 the Navy provided responses to the EPA comments dated October 24, 2000 on the site related chemicals for SWMU 9. On October 31, 2000 the EPA commented on the Navy responses dated October 27, 2000 on the site related chemicals for SWMU 9. On November 13, 2000 the Navy provided responses to EPA comment letter dated September 15, 2000 on the Draft CMS Work Plan for SWMU 9. The Navy submitted the Draft Final CMS Work Plan for SWMU 9 on November 15, 2000. Comments on this report were received in an EPA letter dated December 5, 2000. The Final CMS Work Plan for SWMU 9 was submitted on January 15, 2001. EPA approved the Final CMS Work Plan for SWMU 9 in an EPA letter dated May 4, 2001. The Draft CMS Investigation Report for SWMU 9 was submitted on July 2, 2001. Comments on this report were received in an EPA letter dated October 4, 2001. Due to funding constraints, response to these EPA comments was not submitted by the Navy until September 5, 2002. Comments on the Navy's response to EPA comments were received in an EPA letter dated November 19, 2002. On December 23, 2002 the Navy provided responses to EPA comment letter dated November 19, 2002. Comments on the Navy responses were received in an EPA letter dated February 19, 2003. The Draft Additional Data Collection Work Plan, as well as the Final Corrective Measures Study Investigation Report for SWMU 9 was submitted on April 25, 2003. EPA approved the Final CMSI Report and the Draft Additional Data Collection Work Plan on June 3, 2003. The fieldwork associated with the EPA approved work plan was initiated on July 13, 2003 and completed July 18, 2003. The Draft Additional Data Collection Investigation Report for SWMU 9 was submitted on January 8, 2004. EPA approved the Draft Additional Data Collection Investigation Report in a letter dated February 24, 2004. The Final Additional Data Collection Investigation Report, as well as the Navy's responses to EPA comment letter dated February 24, 2004, was submitted on June 14, 2004. The Navy submitted a Proposed Plan for SWMU 9 on November 3, 2004, due to the inclusion of an interim corrective measure for removal of soil contaminated with lead. The Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment at SWMU 9 Area B (Tanks 214-215) was submitted on December 1, 2004. A Navy letter was submitted to the EPA on January 12, 2005 providing a revised schedule for ecological work at SWMU 9. EPA found the Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 9 Area B (Tanks 214-215) is acceptable according to their letter dated January 7, 2005. Final covers, spines, and cover sheet was submitted on April 29, 2005 for the Final Steps 3b and 4 of the Baseline Ecological Risk Assessment at SWMU 9 Area B. The Navy submitted additional information related to the December 1, 2004 Draft Work Plan for Steps 3b

and 4 of the BERA (e.g., table and /or map giving exact number and locations of toxicity tests), per EPA's request, on April 8, 2005. In accordance with the EPA comment letter dated July 13, 2005, the April 8, 2005 data was considered acceptable. The Final Work Plan for Steps 3b and 4 of the BERA was implemented on August 5, 2005. The data evaluation was conducted and a revision to the Steps 3b and 4 document was warranted and submitted to the EPA on January 10, 2006. Step 5 of the Baseline ERA was initiated on January 21, 2006. The EPA approved this document in their letter dated January 25, 2006. On May 12, 2006, Navy submitted notification to the EPA of suspected petroleum contamination identified at SWMU 9. On September 22, 2006, the Navy submitted a request to US EPA for the postponement of the Ecological Risk Assessment at SWMU 9 based on field conditions of additional stained soil. The request included information that the Navy would delineate the nature and extent of stained soil and potential impacts to groundwater. The Draft RFI Work Plan for SWMU 9 Tank 214 Area was submitted to the EPA on December 4, 2006. On January 17, 2007 the Final RFI Work Plan for SWMU 9 Tank 214 Area was submitted to the EPA in accordance with EPA preliminary comments received January 9, 2007. On August 14, 2007 the Draft Phase I RFI Report for SWMU 9 Area B, Tank 214 Area was submitted to the EPA for review and comment. EPA approved the Draft Phase I RFI report on August 21, 2007 and requested that a Full RFI be completed. The Draft Full RFI Work Plan was submitted to the EPA on November 28, 2007. EPA provided comments on this Work Plan on January 17, 2008. On February 29, 2008 the Final Full RFI Work Plan for SWMU 9 was submitted to the EPA and approved on April 10, 2008. The Full RFI field investigation was completed in January 2009. The Draft Full RCRA Facility Investigation Report for SWMU 9 – Area B, Tank 214 Area was submitted to the EPA on July 14, 2009. The EPA provided comments on the Draft Full RFI Report on September 17, 2009. The Navy responded to EPA comments dated September 17, 2009 and submitted a Proposal for Additional Sampling in support of the Full RFI on November 19, 2009. The EPA provided comments on December 23, 2009 on the additional sampling proposal. On February 1, 2010, the Navy submitted a clarification on Additional Sampling for the Full RFI. On March 5, 2010, the Navy submitted responses to EPA comments dated September 19, 2009 on the Draft Full RFI Report and submitted revisions to the proposal for additional sampling. The EPA provided comments on May 27, 2010 on the additional sampling proposal, and the Navy responded to these comments and submitted a revised proposal on July 8, 2010. The EPA found these responses and sampling proposal acceptable on December 7, 2010. On January 5, 2011 the Additional Sampling Investigation in support of the Full RFI for SWMU 9 – Area B, Tank 214 Area was initiated.

A Draft CMS Final Report for SWMU 31/32 was submitted on January 28, 2000. Comments on the report were received in an EPA letter dated March 15, 2000. Response to these comments was submitted in a Navy letter on May 30, 2000. The Final CMS Final Report for SWMU 31/32 was submitted on April 17, 2000. Comments and approval of the report were received in an EPA letter dated May 4, 2000. A Draft CMI Work Plan Design Package for SWMU 31/32 was submitted on August 14, 2000. Comments on this report were received in an EPA letter dated December 5, 2000. The Final CMI Work Plan Design Package for SWMU 31/32 was submitted on January 25, 2001. Responses to the December 5, 2000 EPA comment letter was submitted on January 26, 2001. EPA approved the Final CMI Work Plan Design Package for SWMU 31/32 in an EPA letter dated May 4, 2001

A Draft CMS Work Plan for SWMU 53 and 54 was submitted on November 27, 2002 in response to the EPA comment letter dated September 19, 2002. Comments on this work plan were received in an EPA letter dated February 19, 2003. The Final CMS Work Plan for SWMUs 53 and 54 was submitted on March 7, 2003. EPA approved the Final CMS Work Plan on June 3, 2003. The Draft CMS Final Report, along with the Draft Corrective Measures Study Investigation (CMSI) Report for SWMU 53 was submitted on July 23, 2003. Comments on the two reports were received in an EPA letter on October 23, 2003. The Final CMS Final Report and the Final CMSI Report were submitted on November 24, 2003. The responses to the EPA comment letter received on October 23, 2003 were also submitted on November 24, 2003. EPA approved the Final CMS Final Report and the Final CMS Investigation Report in a letter dated January 30, 2004. The 100% CMI Design Package was submitted on March 19, 2004. Comments on the design package were received in an EPA letter dated June 3, 2004. The Final CMI Design Package, as well as the Navy's response to EPA comment letter, was submitted on July 13, 2004. Comments on the Final CMI Design Package were received in an EPA letter dated August 20, 2004. Response to these comments, including an Addendum to the Final CMI Design Package for Soil Remediation was submitted on September 20, 2004. The Draft CMS Final Report for SWMUs 54 and 55 was submitted on October 28, 2004. A Navy letter was submitted to the EPA on January 12, 2005 indicating that the Navy intends to pursue the performance of the CMI at SWMU 53. The letter indicated that the Navy understands that EPA will not be able to make a final determination on these sites until the public review process is complete. Comments on the Draft CMS Final Report for SWMUs 54 and 55 were received in an EPA letter dated January 14, 2005.

The EPA requested in their February 24, 2004 comment letter that the potential source area and associated TCE Plumes at the TWFF be designated as SWMU 55. On March 5, 2004 the Navy changed the designation of the TCE Plume site to SWMU 55, thus creating a new IR program site. The Navy preliminary response to EPA Region II comment letter dated February 24, 2004 was submitted via e-mail on June 23, 2004. The Final TCE Plume Delineation and Source Investigation Report, along with the Navy's response to EPA comment letter dated February 24, 2004, were submitted on August 11, 2004. EPA commented on the Final TCE Plume Delineation and Source Investigation Report and Navy's response to comments in a letter dated September 1, 2004. The Draft CMS Final Report for SWMUs 54 and 55 was submitted on October 28, 2004. Comments on the Draft CMS Final Report for SWMUs 54 and 55 were received in an EPA letter dated January 7, 2005. The Navy submitted draft responses to the EPA January 7, 2005 comment letter via e-mail on February 14, 2005. The EPA provided comments on the draft responses dated February 14, 2005 on March 11, 2005 via e-mail. On March 15, 2005 the Navy requested that a conference call be held between EPA, BAH, Baker and the Navy to discuss EPA comments and Navy responses on the TWFF and SWMUs 54 and 55 CMS Final Reports. The conference call was conducted on March 17, 2005 with Revised Navy draft responses to comments submitted to the EPA via e-mail on March 23, 2005. The EPA responded back to the revised draft responses on April 5, 2005. The Navy official responses to EPA comments dated January 7, 2005 were submitted April 8, 2005. In accordance with the EPA comment letter dated July 13, 2005, the April 8, 2005 responses on the October 2004 Draft CMS Report for SWMU 54 and 55 were considered acceptable. The Final CMS Final Report for SWMUs 54 and 55 was modified and submitted to the EPA for review and comment on August 26, 2005. EPA comments dated October 13, 2005 approved the Final CMS Final Report for SWMUs 54 and 55 and was received by the Navy on October 17, 2005. Effective monitoring of the SWMU 54 EOS pilot and 55 permanganate pilot are ongoing. Technical memos summarizing the findings will be submitted to the EPA and EQB with the SWMU 54 and SWMU 55 CMI Work Plans describing the full scale implementation of each sites remedy. Effectiveness monitoring of the SWMU 54 EOS pilot and 55 permanganate pilot are ongoing. Technical memos summarizing the findings will be submitted to EPA and EQB with the SWMU 54 CMI Work Plan and have already been submitted to EPA and EQB with the SWMU 55 CMI Work Plan.

A Draft CMS Final Report for SWMU 10 was submitted to the EPA on July 6, 2001.

The Draft CMS Work Plans for SWMUs 56, 59, 61, 69, 73 and 74 were submitted to the EPA for review on July 31, 2007. The EPA provided comments on these work plans in their letter dated

October 2, 2007. The Navy responded to EPA comments dated October 2, 2008 and submitted the Final CMS Work Plans for SWMUs 56, 59, 61, 69, and 74 on December 6, 2007. The EPA provided comments on the Final CMS Work Plans for SWMUs 56, 59, 61, 69, and 74 on January 25, 2008. The Navy submitted the Final CMS Work Plan for SWMU 73 on January 25, 2008. This document was submitted in accordance with Navy letter dated December 4, 2007 requesting schedule extension for this work plan, and the additional extension granted by the EPA during the January 22, 2008 conference call between the EPA, Navy, Baker, and TechLaw. The EPA notified the Navy of their intent to approve the CMS Work Plan for SWMU 73 on February 21, 2008. The Navy responded to the EPA comments dated January 25, 2008 on February 29, 2008. On December 3, 2008 the Navy submitted a letter to the EPA which included a technical memo from the US Army Center for Health Promotion and Preventative Medicine (CHPPM) requesting additional sampling for SWMU 73 CMS Work Plan. This letter and technical memo serve as the addendum to the approved CMS work plan. The EPA approved the CMS Work Plans for SWMUs 56, 59, 61, 69, and 74 on April 10, 2008. Fieldwork associated with the CMS Work Plans for SWMUs 56, 61, 69, and 74 was initiated on April 27, 2008 and completed on June 13, 2008. The Draft CMS Report for SWMU 69 was submitted to the EPA for review on September 12, 2008; while the Draft CMS Report for SWMU 56 was submitted to the EPA for review on September 26, 2008. On December 3, 2008, the Navy submitted a letter to the EPA requesting the retraction of Draft CMS Reports for SWMUs 56 and 69. The retraction was required due to soil disturbance activities within these SWMUs by the Puerto Rico Ports Authority. On April 20, 2010, the Draft Sampling Strategy for Disturbed Soil Sampling, SWMU 69 – Aircraft Parking Area was submitted to the EPA for review. The EPA commented in a letter dated May 11, 2010. The Final Sampling Strategy for Disturbed Soil Sampling at SWMU 69 – Aircraft Parking Area was submitted to the EPA for review on June 18, 2010; with approval being granted in a PREQB letter dated June 22, 2010. Field work for the disturbed soil sampling was initiated on July 19, 2010. However, due to in climate weather, and excessive amounts of rainfall, the field event was postponed. Field work was re-initiated on August 2, 2010. The Navy submitted a proposal to the EPA on October 7, 2009 to conduct additional delineation sampling at SWMU 61 as part of the CMS Investigation. The EPA commented in a letter dated December 15, 2009 and a modified proposal for Additional Sampling was submitted to the EPA on January 8, 2010. Field work was initiated on February 15, 2010. The (revised) Draft CMS Investigation for SWMU 61 – Request for Additional Sampling was submitted to the EPA on March 11, 2010. On July 2, 2010 the Navy submitted a schedule extension request for the SWMU 61 Draft CMS Report until October 29, 2010, based on the approval of the Summary Report for Environmental Background Concentrations of Inorganic Compounds Addendum C Freshwater Drainage Ditches. On November 1, 2010 the

Navy submitted an additional schedule extension request for the SWMU 61 Draft CMS Report. The report on the SWMU 74 Draft Phase I of the CMS Investigation was submitted to the EPA on November 19, 2009. The EPA commented in a letter dated January 22, 2010. The Final SWMU 74 Draft Phase I of the CMS Investigation was submitted to the EPA on March 26, 2010. The EPA provided comments in a letter dated May 27, 2010. The Revised Final Phase I of the CMS Investigation for SWMU 74 was submitted to the EPA on July 9, 2010. The EPA provided comments in a letter dated September 16, 2010. The Revised Final Phase I of the CMS Investigation for SWMU 74 and Final CMS Work Plan was submitted to the EPA on October 21, 2010. In accordance with EPA comments dated July 23, 2008 the Draft CMS Work Plan for SWMUs 27, 28, and 29 was submitted to the EPA on December 16, 2010.

7. Investigations

- On November 1, 2010 field work was initiated for the MNA AOC F Year 8 Quarter 3 sampling event.
- On January 5, 2011 the RFI Additional Sampling Investigation for SWMU 9 – Area B, Tank 214 Area was initiated.
- On January 12, 2011 a wetland delineation was performed for the area adjacent to SWMU 68 in anticipation of soil removal activities.

8. Mothballing of DESC ASTs and Cut and Cover Tanks and Associated Piping

The work associated the DESC ASTs has been completed. The report documenting all activities has been finalized.

9. Corrective Measures Implementation

The Corrective Measures Implementation for Soil Remediation at SWMUs 9, 13, 46, 53, and AOC C was initiated in April 2006 with final backfill activities being completed January 2009. The Final Site Closeout Report was submitted to the EPA on August 6, 2010.

The Corrective Measure Implementation (CMI) for SWMUs 54 and 55 was initiated in July 2009 with the pilot test designs and field tests. The project plans have been approved by the Navy. Field work continued through this reporting period with the continued monitoring of the effectiveness of the pilot tests at SWMUs 54 and 55. Pilot test summary technical memos will be submitted with the SWMU 54 CMI Work Plan and have already been submitted in the SWMU 55 CMI Work Plan.

10. BCT Meetings

A BCT for NAPR was formed and has conducted the following meetings:

- The first BCT Meeting was conducted June 14 and 15, 2006 at the PR EQB offices in San Juan, PR.
- The second BCT Meeting was conducted August 21 and 22, 2006 at the offices of Winston & Strawn LLP in Washington D.C.
- The third BCT Meeting was conducted November 2, 2006 at the PR EQB offices in San Juan, PR.
- The fourth BCT Meeting was conducted February 7, 2007 at the PR EQB offices in San Juan, PR.
- The fifth BCT Meeting was conducted August 7, 2007 at the LRA offices in San Juan, PR.
- The sixth BCT Meeting was conducted September 9, 2008 at NAPR, Ceiba, PR.

11. Restoration Advisory Board

A RAB for NAPR was formed and has conducted the following meetings:

- A public meeting was held on November 28, 2006 to solicit public interest in joining the RAB for NAPR. This meeting was conducted at the Ceiba Public Use Center.
- The first RAB Meeting was conducted February 7, 2007 at Fajardo Public Use Center.
- The second RAB meeting was conducted March 12, 2007 at the La Seyba Club in Ceiba, PR.
- The third RAB meeting was conducted April 12, 2007 at the La Seyba Club in Ceiba, PR.

- The fourth RAB meeting was conducted on June 14, 2007 at the Salon de Actos in Naguabo.
- The fifth RAB meeting was conducted August 7, 2007 at the La Seyba Club in Ceiba, PR.
- The sixth RAB meeting was conducted October 25, 2007 at the La Seyba Club in Ceiba, PR.
- The seventh RAB meeting was conducted January 16, 2008 at the La Seyba Club in Ceiba, PR.
- The eighth RAB meeting was conducted April 30, 2008 at the La Seyba Club in Ceiba, PR.
- The ninth RAB meeting was conducted September 9, 2008 at the La Seyba Club in Ceiba, PR.
- The tenth RAB meeting was conducted November 13, 2008 at the La Seyba Club in Ceiba, PR.
- The eleventh RAB meeting was conducted January 13, 2009 at the La Seyba Club in Ceiba, PR.
- The twelfth RAB meeting was conducted March 18, 2009 at the La Seyba Club in Ceiba, PR.
- The thirteenth RAB meeting was conducted May 13, 2009 at the La Seyba Club in Ceiba, PR.
- The fourteenth RAB meeting was conducted on August 19, 2009 at the La Seyba Club in Ceiba, PR.
- The fifteenth RAB meeting was conducted on October 28, 2009 at the La Seyba Club in Ceiba, PR.
- The sixteenth RAB meeting was conducted on January 13, 2010 at the La Seyba Club in Ceiba, PR.
- The seventeenth RAB meeting was conducted on April 8, 2010 at the La Seyba Club in Ceiba, PR.

- The eighteenth RAB meeting was conducted on July 28, 2010 at the La Seyba Club in Ceiba, PR.
- The nineteenth RAB meeting was conducted on November 4, 2010 at the La Seyba Club in Ceiba, PR.
- The Twentieth RAB meeting was held on January 27, 2011 at the La Seyba Club in Ceiba, PR.
- The twenty-first RAB meeting is scheduled for March 17, 2011 at the La Seyba Club in Ceiba, PR.

12. Interim Corrective Measures

The Draft Interim Corrective Measures Work Plan for SWMUs 1 and 2 was submitted to the EPA on November 19, 2010. The Draft Final Steps 6 and 7 of the Baseline Ecological Risk Assessment for SWMU 1 was submitted to the EPA on December 1, 2009. The EPA provided comments on the SWMU 1 Draft Final BERA report, SWMU 2 Steps 6 and 7 BERA Report, and the Draft ICM Work Plan for SWMUs 1 and 2 in their letter dated January 28, 2010. In a letter dated March 30, 2010 the Navy informed the EPA of Munitions and Explosives of Concern (MEC) discovered at SWMU 1 during the implementation of the Phase I ICM. The Final Steps 6 and 7 of the BERA for SWMU 1 was submitted to the EPA on April 5, 2010. The EPA provided comments on the Final Steps 6 and 7 of the BERA in a letter dated May 27, 2010. The Draft Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 was submitted to the EPA on August 13, 2010. The EPA commented in their letter dated October 14, 2010. The Draft Final Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 was submitted on December 16, 2010 in accordance with the EPA comments dated October 14, 2010. The Final Design Packaged for Interim Corrective Measures for SWMU 2 including the Final Basis of Design, Final Design Drawings, and Final Technical Specifications were submitted to the EPA on January 5, 2011 in accordance with EPA comments dated October 14, 2010.

TABLE 1-1

**NAVAL ACTIVITY PUERTO RICO CORRECTIVE ACTION PROGRAM
SWMU/AOC STATUS
AUGUST 31, 2010**

| SWMU or Area of Concern | RFI Type | Status |
|----------------------------------|---------------------|--|
| #1 Former Cremator Disposal Site | Full ⁽¹⁾ | <p>RFI completed and approved 9/28/99. Revised Final II CMS WP submitted 7/14/00 and EPA approved 5/4/01. CMS initiated. Draft Screening-Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate submitted 8/10/01. Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment submitted 8/10/01. EPA commented 10/4/01 approving Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment. Addendum to the Draft Screening-Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate, including response to comments submitted 5/14/03. EPA provided contingent approval 6/10/03. Field investigation initiated 7/23/03 and completed 8/8/03. Draft Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of Baseline ERA submitted 2/13/04. EPA comment letter dated 4/9/04. Navy preliminary response to comment letter submitted via e-mail on 5/21/04. Navy letter to EPA submitted 6/2/04 regarding the due date of Navy's official response to EPA comments. EPA comments received via e-mail on 6/11/04. Conference call held on 6/21/04. Revised Navy response to comment letter submitted via e-mail on 7/9/04. EPA approved Navy's revised response to comments on 7/16/04. Formal Navy response to EPA comment letter dated 4/9/04 submitted 7/23/04. EPA comments received via e-mail on 7/30/04. Conference call held on 7/30/04. EPA comment letter dated 8/20/04. Formal response to comments including the Final Additional Data Collection Effort Work Plan submitted 9/9/04. Correction to work plan submitted 9/16/04. Field investigation initiated 10/2/04 and completed 10/6/04. Navy letter was submitted to EPA on 1/12/05 providing a revised schedule for ecological work. Navy letter was submitted to EPA on 3/8/05 providing a revised schedule for ecological work. Draft Final Additional Data Collection Report and Screening level Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment submitted 3/18/05. EPA submitted comments on 7/13/05 addressing the SWMU 1 Draft Final Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of the BERA. The EPA determined that the responses for SWMU 1 were not fully acceptable as discussed in a Technical Review. A revised response letter was requested by EPA. A tele-con was held between EPA, Navy, BAH, and Baker to discuss SWMU 1. Responses to the EPA's comments dated 7/13/05 on the Navy's 6/17/05 Preliminary Responses to EPA's comments on the SWMU 1 and 2 Draft Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA were submitted to the EPA on 9/9/05. The EPA approved, the Navy Responses dated 9/9/05 on 12/20/05 via e-mail. The Navy will proceed with preparing the Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA. The Final Additional Data Collection Report and Screening Level ERA and Step 3a of the</p> |

TABLE 1-1

**NAVAL ACTIVITY PUERTO RICO CORRECTIVE ACTION PROGRAM
SWMU/AOC STATUS
AUGUST 31, 2010**

| SWMU or Area of Concern | RFI Type | Status |
|--|----------|---|
| #1 Former Cremator Disposal Site (cont.) | Full | <p>Baseline ERA was submitted to the EPA for review and approval on 5/18/06. EPA approved this Report in the 6/22/06 Comment Letter, and requested an updated schedule for SWMU 1. This updated schedule was issued to EPA on 7/28/06. The Draft Steps 3b and 4 of the ERA at SWMU 1 was submitted to the EPA for review and approval on 9/29/06. EPA commented on the Draft Steps 3b and 4 of the ERA on 12/8/06. The Final Steps 3b and 4 of the Ecological Risk Assessment at SWMU 1 and 2 was submitted to the EPA on 1/10/07, including the Navy response to EPA's comments dated 12/8/06. The EPA forwarded a letter to the Navy on 2/13/07 approving the Final Steps 3b and 4 of the Baseline ERA for SWMUs 1 and 2. The Navy initiated the field verification for the Baseline ERA for SWMUs 1 and 2 on 2/26/07. Step 6 of the Baseline ERA was initiated on 4/27/07. The field work associated with SWMUs 1 and 2 for the Baseline ERA was completed on 5/23/07. Steps 6 and 7 of the Draft Baseline ERA submitted to the EPA on 7/1/09. EPA commented on the Draft Baseline ERA Report on 9/17/09. Draft Phase I ICM Work Plan submitted to EPA 11/19/09. Draft Final Steps 6 and 7 of BERA submitted to EPA 12/1/09. The EPA provided comments on the SWMU 1 Draft Final BERA report, and Draft ICM Work Plan for SWMUs 1 and 2 on 1/28/10. The Navy informed EPA on 3/30/10 of MEC found during ICM. The Final Steps 6 and 7 of the BERA for SWMU 1 was submitted to EPA 4/5/10 and approved by the EPA on 5/27/10. On 4/6/10 the Navy requested a schedule extension for the ICM Work Plan until 6/30/10. Draft ICM Work Plan, Design Package, and CAOs for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 submitted to EPA 8/13/10. The EPA commented in their letter dated 10/14/10. NOSSA comments on the ESS were resolved and the document was forwarded to the DDESB on 11/24/10. DDESB comments, received 12/22/10, were resolved with NOSSA by 1/3/11. DDESB approval was confirmed by NOSSA on 1/10/11. The Draft Sampling and Analysis Plan for On-Site Construction Support for Debris Removal was submitted to the EPA on 12/9/10. The Draft Final Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 were submitted to the EPA on 12/16/10. The preparation of the Draft HASP/APP was initiated.</p> |
| #2 Langley Drive Disposal Site | Full | <p>Draft Additional Data Collection Report and Screening Level ERA and Step 3a of Baseline ERA submitted 2/13/04. EPA comment letter dated 4/9/04. Navy preliminary response to comments via e-mail on 5/21/04. Navy letter to EPA submitted 6/2/04 regarding due date of Navy's official response to EPA comments. EPA comments received via e-mail on 6/11/04. Conference call held on 6/21/04. Revised Navy response to comments submitted via e-mail on 7/9/04. EPA approved Navy's revised response to comments on 7/16/04. Formal Navy response to EPA comment letter dated 4/9/04 submitted 7/23/04. EPA comments received via e-mail on 7/30/04. Conference call</p> |

TABLE 1-1

**NAVAL ACTIVITY PUERTO RICO CORRECTIVE ACTION PROGRAM
SWMU/AOC STATUS
AUGUST 31, 2010**

| SWMU or Area of Concern | RFI Type | Status |
|--|----------|--|
| #2 Langley Drive Disposal Site (cont.) | Full | <p>held on 7/30/04. EPA comment letter 8/20/04. Formal response to comments including the Final Additional Data Collection Effort Work Plan submitted 9/9/04. Correction to work plan submitted 9/16/04. Field investigation initiated 10/2/04 completed 10/6/04. The Draft Final Additional Data Collection Report and Screening level Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment submitted 3/18/05. EPA submitted a comment letter on 7/13/05 addressing the SWMU 2 Draft Final Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of the Baseline ERA. The EPA determined that the responses for SWMU 2 were not fully acceptable as discussed in a Technical Review. A revised response letter was requested by EPA. A tele-con was held between EPA, Navy, BAH, and Baker to discuss SWMU 2. Responses to EPA's comments dated 7/13/05 on the Navy's 6/17/05 Preliminary Responses to EPA's comments on the SWMU 1 and 2 Draft Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA were submitted to the EPA on 9/9/05. The EPA approved Navy Responses dated 9/9/05 on 12/20/05 via e-mail. The Navy will proceed with preparing the Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA. The Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA was submitted to the EPA for review and approval on 5/18/06. EPA approved this Report in the 6/22/06 comment Letter, and requested an updated schedule for SWMU 2. This updated schedule was issued to EPA on 7/28/06. The Draft Steps 3b & 4 of the ERA at SWMU 2 was submitted to the EPA for review and approval on 9/9/06. EPA commented on the Draft Steps 3b and 4 of the ERA on 12/8/06. The Final Steps 3b and 4 of the Ecological Risk Assessment at SWMU 1 and 2 was submitted to the EPA on 1/10/07, including Navy responses to EPA's comments dated 12/8/06. The EPA forwarded a letter to the Navy on 2/13/07 approving the Final Steps 3b and 4 of the Baseline ERA for SWMUs 1 and 2. The Navy initiated the field verification for the Baseline ERA for SWMUs 1 and 2 on 2/26/07. The field work associated with SWMUs 1 and 2 for the Baseline ERA was completed on 5/23/07. The Draft Phase I ICM Work Plan submitted to EPA 11/19/09. Draft Steps 6 and 7 of the Baseline ERA submitted to EPA 12/3/09. The EPA provided comments on the SWMU 2 Steps 6 and 7 BERA Report, and the Draft ICM Work Plan for SWMUs 1 and 2 on 1/28/10. Draft Final Steps 6 and 7 BERA Report submitted 4/7/10, and approved by the EPA on 5/27/10. Draft ICM Work Plan, Design Package, and CAOs for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 submitted to EPA 8/13/10. The EPA commented in their letter dated 10/14/10. The Draft Final Corrective Action Objectives for Terrestrial Avian Omnivores</p> |

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| SWMU or Area of Concern | RFI Type | Status |
|--|----------|---|
| #2 Langley Drive Disposal Site (cont.) | Full | and Preliminary Delineation Investigation for SWMUs 1 and 2 were submitted to the EPA on 12/16/10. The Final Design Package for Interim Corrective Measures was submitted to the EPA on 1/5/11. |
| #3 Base Landfill | Full | Draft Semi-Annual Groundwater Monitoring Report for September 2003 submitted 1/22/04 to NSRR and LANTDIV. Groundwater Sampling Event performed in March 2004. NAPR submitted Draft Semi-Annual Groundwater Monitoring Report for March 2004 on 7/20/04. The Navy submitted an e-mail on 21 July 2004 to the EPA requesting the status of the EPA's review of Final RFI document. Subtitle D fieldwork initiated 9/30/04 and completed 10/1/04. NAPR submitted a Closure /Post Closure Plan, and a Work Plan for Areas 2, 3, and 4 of the landfill to EQB and EPA for Approval on 10/24/04. NAPR submitted Draft Semi-Annual Groundwater Monitoring Report for September 2004 on 3/3/05. Subtitle D fieldwork initiated 3/1/05 and completed 3/3/05. EPA submitted comments to the Plan on 3/11/05. NAPR responded to EPA's comments on 5/5/05. EPA requested revision to the Closure Plan and Work Plan on letter dated 7/1/05. NAPR's reply letter is due 8/19/05. Submit the Semi-Annual Groundwater Monitoring Report for March 2005 sampling event to the EQB and EPA. Subtitle D fieldwork initiated 9/26/05 and completed 9/28/05. Report scheduled to be sent to EQB and EPA upon completion. Closure Plan is complete pending public review. The Draft Statement of Basis for SWMU 3 was submitted to the EPA on 3/20/06. Comments were received from EPA on the Draft Statement of Basis on 3/22/06. The Revised Draft Statement of Basis for SWMU 3 was submitted to the EPA on 3/30/06. Comments on the Revised Draft Statement of Basis were received on 4/3/06. The Final Statement of Basis for SWMU 3 Solid Waste Landfill was submitted to the EPA on April 11, 2006. On August 28, 2006 the Navy issued to the EPA the 60-day notification for commencement of Closure activities at SWMU 3. This notification included a revised schedule for closure activities. Groundwater Sampling Event initiated 9/18/06 and completed 9/22/06. On October 11, 2006, Navy notified PR EQB that SWMU 3 accepted the final waste load on 9/28/2006 and closure activities were commencing per the revised schedule. The Navy provided a response to EPA Comments dated 10/20/06 on the Navy Responses dated 9/11/06 on the EPA Comments dated 8/3/06 on the Semi-Annual Groundwater Monitoring Report, 9/05 Sampling Event, Base Landfill, NAPR, dated 2/25/06. Subtitle D fieldwork initiated 3/12/07 and completed 3/14/07. Groundwater sampling event initiated on 9/25/07 and completed 9/27/07. Submitted 3/07 Semi-Annual Groundwater Monitoring Report on 10/9/07. Received EPA comments dated 12/11/07 on 12/17/07. Submitted |

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| SWMU or Area of Concern | RFI Type | Status |
|--------------------------|----------|--|
| #3 Base Landfill (cont.) | Full | <p>the 9/07 Semi-Annual Groundwater Monitoring Report on 1/18/08. The Draft Landfill Gas Monitoring Work Plan and Navy responses to EPA comments dated 12/11/07 was submitted to the EPA on 2/15/08. EPA provided comments on the 9/07 Report in letter dated 2/26/08. The Revised Groundwater Sampling and Analysis Program submitted to the EPA on 4/3/08. EPA provided comments on Gas Monitoring Work Plan in letter dated 4/10/08. Navy responded to EPA Comments 2/26/08 on 4/17/08. Final Landfill Gas Monitoring Work Plan and Navy responses to EPA comments dated April 10, 2008 submitted to EPA on May 20, 2008. Landfill monitoring well protective casing repair completed on 6/13/08. Submitted the 3/08 Semi-Annual Groundwater Monitoring Report on 7/8/08. Received EPA comment letter dated 7/23/08 on the Final Landfill Gas Monitoring Work Plan. Groundwater sampling event initiated on 9/10/08 and completed 9/11/08. The Revised Final Landfill Gas Monitoring Work Plan was submitted to EPA on August 28, 2008. The EPA approved the Revised Final Landfill Gas Monitoring Work Plan on 10/3/08. Submitted the 9/08 Semi-Annual Groundwater Monitoring Report on 2/16/09. Groundwater sampling event initiated on 3/4/09 and completed 3/5/09. In addition, the first landfill gas monitoring event was conducted on 3/5/09. The EPA provided comments on the 9/08 Report in letters dated 4/23/09, while the PREQB provided comments in a separate letter dated 3/19/09. The Final Semi-Annual Groundwater Monitoring Report - September 2008 Sampling Event and Navy responses to EPA comments were submitted to the EPA 6/2/09. The PREQB approved the document on 7/6/09. On 7/1/09 the Draft Semi-Annual Groundwater Monitoring Report – March 2009 Sampling Event for SWMU 3 was submitted to the EPA. The PREQB provided comments on the 7/09 Report on 7/28/09. The PREQB also provided comments on the 7/09 Landfill Gas Monitoring Report on 7/29/09. Groundwater sampling and the second landfill gas monitoring event initiated on 9/30/09 and completed 10/1/09. Draft Semi-Annual Groundwater Monitoring Report-September 2009 Sampling Event was submitted to EPA 12/30/09. EPA provided comments 3/11/10. Final Semi-Annual Groundwater Monitoring Report-September 2009 Sampling Event was submitted to EPA 4/29/10. March 2010 Groundwater sampling and landfill gas monitoring event completed March 2010. The Draft Semi-annual Groundwater Monitoring Report for the March 2010 sampling event was submitted to the EPA 6/25/10. Approved by the EPA 9/16/10. The Draft Semi-Annual Groundwater Monitoring Report – September 2010 Sampling Event for SWMU 3 was submitted to the EPA on 12/15/10.</p> |

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| SWMU or Area of Concern | RFI Type | Status |
|-------------------------|----------------------------|---|
| #6 Building 145 | First Phase ⁽²⁾ | Draft CMS Work Plan submitted 1/7/00 and EPA approved 3/15/00. Draft CMS Final Report submitted 5/30/00. EPA comment letter 7/5/00. Responded to EPA comments 8/22/00. Draft Final CMS Final Report submitted 11/30/00. EPA comment letter 5/4/01. Final CMS Final Report and response to comments submitted 6/21/01. No further action recommended in RCRA Permit Renewal. The Navy submitted an e-mail on 7/21/04 to the EPA requesting the status of the EPA's review of this document. EPA will provide official determination on this site in a 7003 Administrative Order on Consent that will replace the existing Part B Permit. Corrective Action Complete without Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #7 Tow Way Fuel Farm | Full | RFI completed and approved 9/9/97. Additional investigations required as part of the CMS, work plan submitted 12/12/97. EPA commented 2/11/98. Responded to comments 5/6/98. CMS field investigations performed 4/98. Draft CMS Report for TWFF submitted 6/30/98 and EPA approved 10/2/98. Response to comments submitted 12/16/98. EPA comment letter 3/8/99. Response to comments and EPA approved Final CMS Investigation Report submitted 4/21/99. CleanOX® pilot study performed January 1999. Final CleanOX® Pilot Test Report submitted 10/99. ICM was postponed, but associated monitoring continued. Work Plan for TWFF Investigations related to detections of TCE in Groundwater submitted 4/21/99 and EPA approved 5/12/99. TCE Investigation performed 6/99. Draft TCE Investigation Report submitted 12/10/99 and EPA approved 1/20/00. Final TCE Investigation Report submitted 2/15/00. Draft CMS Task I Report submitted 11/30/98, EPA commented 3/8/99. Revised Draft CMS Task I Report submitted January 21, 2000, EPA commented 5/4/00. Response to comments submitted 6/29/00 and EPA commented 10/10/00. Draft Pilot Test to Evaluate Enhancement of Product Recovery Report for TWFF SWMU 7/8 submitted 10/31/00. Response to EPA comments dated 10/10/00 submitted 11/8/00. Revised Section 3.0 of the Task I CMS submitted 1/31/01 and EPA commented 5/4/01. Draft Work Plan for Additional Data Collection submitted 1/31/01 and EPA commented 5/4/01. Draft Final Work Plan for Additional Data Collection submitted 7/6/01 and EPA commented 8/8/01. Final Work Plan for Additional Data Collection for TWFF and Draft Work Plan for Ecological Risk Assessment submitted 9/26/01. Revisions to the work plans submitted 11/02/01 and EPA approved 11/21/01. Fieldwork initiated 1/6/02 and completed 03/14/02. Proposed revision to corrective measure schedule submitted 3/26/02. Draft Final CMS Task I Report along with the Draft Additional Data Collection Investigation Report and the Draft |

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| SWMU or Area of Concern | RFI Type | Status |
|------------------------------|----------|--|
| #7 Tow Way Fuel Farm (cont.) | Full | <p>Groundwater Model Report submitted 7/09/02. EPA commented 10/24/02. Addendum to the Draft Final CMS Task I Report submitted 1/6/03. Replacement pages for the addendum and response to comments submitted 1/8/03. EPA comment letter 3/13/03. Replacement pages for the Revised Draft Final CMS Task I Report and response to comments submitted 4/22/03. Draft TCE Plume Source Delineation Work Plan submitted 5/8/03. Replacement pages and responses for the Final CMS Task I Report submitted 5/23/03. EPA comment letter on the Draft TCE Plume Work Plan and approval on the replacement pages for the Final CMS Task I Report dated 6/10/03. Final TCE Plume Source Delineation Work Plan submitted 7/25/03. Response to EPA comments dated 6/10/03 submitted 8/11/03. Field investigation initiated 9/12/03 and completed 9/28/03. Draft CMS Final Report submitted 11/24/03. Draft TCE Plume Delineation and Source Investigation Report submitted 1/21/04. EPA comment letter dated 1/30/04 regarding the Draft CMS Final Report. EPA comment letter dated 2/24/04 regarding the Draft TCE Plume Delineation and Source Investigation Report. Comment letter requested the potential source area and associated TCE plume be designated as SWMU 55 (see new SWMU 55). Navy submitted preliminary response to EPA's 1/30/04 comment letter on 3/5/04. A conference call was held on 3/22/04 between the Navy and EPA to discuss the Navy's preliminary response to comments. Navy submitted a letter to the EPA regarding the EPA's comments dated January 30, 2004 on 4/6/04. Draft Final CMS Final Report and response to EPA comment letter submitted 11/8/04. EPA commented 1/7/05. Navy preliminary responses to EPA comments dated 1/7/05 were submitted via e-mail on 2/14/05. EPA provided comments on the responses on 3/11/05. Navy requested conference call to discuss comments and responses on 3/15/05. Conference call held 3/17/05. Revised Navy preliminary responses to EPA comments dated 1/7/05 were submitted via e-mail on 3/23/05. EPA provided preliminary comments on the responses on 4/5/05. Navy responses to EPA comments dated 1/7/05 were submitted 4/8/05. Prepare and submit Final CMS Final Report upon EPA approval of response to comments. The EPA response letter on 7/19/05 stating that the EPA completed the review of the Navy's 4/8/05 responses to EPA's 1/7/05 comments and has determined that the responses are acceptable. The Final CMS Final Report for the TWFF was submitted to the EPA 8/29/05. EPA provided comment on 10/13/05 on Final CMS Final Report. Addendum to Final CMS Final Report due to EPA 12/1/05. The Revised Final CMS Final Report was submitted to the EPA 11/22/05 along with responses to EPA comments 10/13/05. The Navy received the EPA letter dated 2/9/06 approving the Revised Final CMS Final Report for the Tow Way Fuel Farm dated 11/22/05. The Draft Statement of Basis for the Tow Way Fuel Farm was</p> |

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| SWMU or Area of Concern | RFI Type | Status |
|--------------------------------------|----------|--|
| #7 Tow Way Fuel Farm (cont.) | Full | submitted to the EPA on 3/20/06. Comments were received from EPA on the Draft Statement of Basis on 3/22/06. The Revised Draft Statement of Basis for the Tow Way Fuel Farm was submitted to the EPA on 3/30/06. Comments on the Revised Draft Statement of Basis were received on 4/3/06. The Final Statement of Basis for the Tow Way Fuel Farm was submitted to the EPA on 4/11/06. The CMI for the Tow-Way Fuel Farm has been initiated. CMI Work Plans submitted and approved by the Navy. CMI began on June 2009. Technical memo describing soil delineation sampling event for arsenic and PAHs was submitted to EPA and EQB. EPA requested that this memo be resubmitted as a CMS addendum. CMS addendum was submitted to EPA and EQB on March 10, 2010, with regulatory comments received 6/28/10. Finished installation of recovery wells tested various product recovery pumps and systems, and periodic measurement of product thickness. The Draft SWMU 7/8 Monitored Natural Attenuation Work Plan was submitted to the EPA on 8/2/10. The Draft CMI was submitted to EPA 8/16/10. The EPA commented in a letter dated 12/8/10. |
| #8 Tow Way Fuel Farm - Disposal Pits | Full | Combined with SWMU 7. |
| #9 Tank 212-217 Sludge Burial Pits | Full | Draft Additional Data Collection Work Plan and Final Corrective Measures Study Investigation Report submitted 4/25/03 and EPA approved 6/3/03. Field investigation was initiated 7/13/03 and completed 7/18/03. Draft Additional Data Collection Investigation Report submitted 1/8/04 and EPA approved 2/24/04. Final Additional Data Collection Investigation Report and response to EPA comment letter submitted 6/14/04. Navy Proposed Plan for soil removal submitted 11/3/04. Draft Steps 3b and 4 of the Baseline ERA submitted 12/1/04. Navy letter was submitted to EPA on 1/12/05 providing a revised schedule for ecological work. EPA found the Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment for SWMU 9 Area B (Tanks 214-215) acceptable on 1/7/05. Navy letter was submitted to EPA on 3/8/05 providing a revised schedule for ecological work. Navy official responses to EPA comments dated 1/7/05 were submitted 4/8/05. Final Steps 3b and 4 of the Baseline ERA submitted 4/29/05. The Navy submitted additional information related to the 12/1/04 draft Work Plan for Steps 3b and 4 of the BERA per EPA's request on 4/8/05. In accordance with the EPA comment letter dated 7/13/05, the 4/8/05 data was considered acceptable. The Navy will proceed with conducting field work for Steps 3b and 4 of the BERA. The field verification portion of the Final Work Plan for Steps 3b and 4 of the BERA was initiated on 8/5/05. The data evaluation was completed and the Revised Final Steps 3b and 4 of the Baseline ERA was submitted to the EPA on 1/10/06. Step 6 the Ecological Field Study was |

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| SWMU or Area of Concern | RFI Type | Status |
|--|----------|---|
| #9 Tank 212-217 Sludge Burial Pits (cont.) | Full | <p>initiated 1/21/06. The EPA approved the Revised Final Steps 3b and 4 of the Baseline ERA on 1/25/06. The CMI for soil removal was initiated 4/06. The Navy submitted notification to the EPA of suspected petroleum contamination identified at SWMU 9 on 5/12/06. On 9/22/06, the Navy submitted a request to US EPA for the postponement of the Ecological Risk Assessment at SWMU 9 based on the identification of stained soil during the ICM. The request included information that the Navy would delineate the nature and extent of stained soil and potential impacts to groundwater. A Phase I RFI work plan was submitted to the EPA on 12/4/06. The Navy received EPA comments letter on 2/13/07 approving the Final Phase I RCRA Facility Investigation Work Plan for SWMU 9 Area B, Tank 214 area. The field work was initiated on 3/21/07. The Draft Phase I RFI Report for SWMU 9 Area B, Tank 214 Area was submitted to EPA on 8/14/07. EPA approved Draft Phase I RFI report on 8/21/07 and requested that a Full RFI be completed. The Final Full RFI Work Plan for SWMU 9 Area B, Tank 214 Area was submitted to the EPA on 2/29/08 and approved by the EPA on 4/10/08. The fieldwork was initiated on 1/12/09. Navy submitted the Proposed Airfield Schedule to EPA on 12/3/08 including the completion of remedial activities at SWMU 9. The backfill of the excavated areas was initiated on 1/12/09. The Draft Full RFI was submitted to the EPA on 7/14/09. EPA provided comments on the Draft Full RFI on 9/17/09. Navy responded to EPA comments 9/17/09 and submitted a Proposal for Additional Sampling on 11/19/09. The EPA provided comments (sent via e-mail) on 12/23/09. The Navy responded to EPA request 12/23/09 on sampling at SWMU 9 on 2/1/10. Navy response to EPA comments 9/17/09 and revised proposal for additional sampling was submitted 3/5/10. The EPA provided comments on 5/27/10, the Navy responded to EPA comments on 7/8/10, and the EPA found the response to be acceptable on 12/7/10. The Additional RFI Sampling Investigation SWMU 9 – Area B, Tank 214 Area was initiated on 1/5/11. Draft Project Closeout Report Remedial Action for Soil Remediation submitted to EPA 12/4/09. EPA provided comments dated 3/11/10 on the closeout report. The Final Project Closeout Report was submitted to the EPA 8/6/10.</p> |

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| SWMU or Area of Concern | RFI Type | Status |
|---|-------------|---|
| #10 Substation 2/Building 90 | First Phase | RFI additional investigation performed 9/97. Draft RFI Report for Additional Investigations at OUs 1, 6, and 7 completed 5/6/98. No comments in EPA comment letter 9/15/98. 3/7/00 EPA requested CMS to be developed. Draft CMS Final Report submitted 7/6/01. No further action recommended in RCRA permit renewal. The Navy submitted an e-mail on 7/21/04 to the EPA requesting the status of the EPA's review of this document. EPA will provide official determination on this site in a 7003 Order that will replace the existing Part B Permit. Corrective Action Complete with Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #11 Old Power Plant/Building 38 | Full | RFI completed and approved 9/28/99. Bldg. interior additional characterization depends on result of EPA review of data and recharacterization work plan submitted 3/31/98. EPA comment letter 3/08/02. Navy letter dated 5/14/02. Draft Recharacterization Work Plan and response to comment letter submitted 3/18/03. EPA comment letter 6/3/03. Final Recharacterization Work Plan and response to comment letter submitted 7/21/03 and EPA approved via e-mail on 8/14/03. Field investigation initiated 9/7/03 and completed 9/11/03. Draft RFI Report submitted on February 5, 2004. EPA comment letter dated 3/26/04. Draft Final RFI Report and response to comment letter submitted 5/18/04. A letter regarding Land Use Controls for SWMU 11 was sent to the EPA on 4/26/07. Prepare and submit Final RFI Report once EPA comments are received. |
| #12 Fire Training Pit Oil/Water Separator | First Phase | RFI complete. No further action proposed in RCRA Part B permit renewal. Corrective Action Complete without Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #13 Old Pest Control Shop/Building 258 | First Phase | Draft RFI Report for Additional Investigations for OUs 1, 6, and 7 completed 5/6/98. EPA approved 5/6/98 report and requested CMS 9/15/98. Revised Final II CMS Final Report submitted 8/4/00 and EPA approved 9/15/00. 100% Final CMI Work Plan Design Package submitted 1/25/01 and EPA approved 5/4/01. EPA to send CMI Work Plan out for public comment. Navy letter submitted to EPA on 1/12/05 indicating that the Navy intends to pursue the performance of the CMI. The CMI for soil removal was initiated April 2006. Navy submitted the Proposed Airfield Schedule to EPA on 12/3/08 including the completion of remedial activities at SWMU 13. The backfill of the excavated areas was initiated on 1/12/09. Navy letter submitted to EPA on 1/21/09 indicating that the Navy has completed all actions required to address releases from SWMU 13 within Sale Parcel III. |

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|---|-------------|--|
| #13 Old Pest Control Shop/Building 258 (cont.) | First Phase | EPA will concur with the determination that the Navy has satisfied all requirements subject to an acceptable final report documenting the completion of all required corrective measures at SWMU 13 as stated in EPA comment letter 1/27/09. Draft Project Closeout Report Remedial Action for Soil Remediation submitted to EPA 12/4/09. EPA provided comments dated 3/11/10. The Final Project Closeout Report and Draft Statement of Basis was submitted to EPA 8/6/10. Received EPA comments (via e-mail from Mr. Tim Gordon) on 10/19/10. The Final Statement of Basis was submitted to EPA 10/27/10. |
| #14 Fire Training Pit Area | First Phase | Draft RFI Report for OU 1, 6, and 7 completed 7/96. Revised Human Health Risk Assessment Report was submitted 2/4/00. EPA comment letter 7/5/00. Responded to EPA comments 8/22/00. Draft Interim Decision Document submitted 11/22/00 and approved by the EPA 5/4/01. Further action deferred till site closed. Draft RFI Work Plan was submitted to EPA on 7/19/05 for EPA review. EPA comments on the Draft RFI Work Plan dated 8/29/05 were received by the Navy on 9/6/05. A conference call was held on 10/27/05 between EPA, NAPR, BAH, Navy, and Baker to discuss comments received from EPA on the Draft RFI Work Plan. Navy to submit Final RFI Work Plan 11/10/05 along with responses to EPA comments. Revised Final Work Plan submitted 12/29/06. EPA approved the Revised Final RFI Work Plan 1/25/06. The field work associated with the SWMU 14 RFI Field Investigation was initiated on 4/2/06 and completed on 4/7/06. The conclusion of a 7/12/06 conference call among EPA Region II, Navy and Baker postponed the submission of the RFI Report that was scheduled for delivery 7/14/06. The Draft RFI Report for SWMU 14 was submitted to the EPA on 12/18/06. The EPA provided comments to the Draft RFI Report 2/13/07. The Final Phase I RCRA Facility Investigation Report for SWMU 14 was submitted to the EPA on 3/23/07. This document was submitted in accordance with comments received 2/13/07 from the EPA. The EPA provided comments on the Final RFI Report in a letter dated 5/29/07. Navy responded to the 5/29/07 EPA Comments on 7/20/07. The Final Additional Data Collection Work Plan was submitted to EPA on 11/9/07 and approved by the EPA on 12/11/07. Field work initiated 2/10/08. The Draft Additional Data Collection Report in Support of Ecological Risk Assessment submitted to EPA on 6/27/08. Pre-excavation surface soil sampling for airfield remediation was conducted the week of 9/22/08. The EPA provided comments 10/3/08. On 11/21/08 the Navy submitted a letter notifying the EPA that the Navy Responses to EPA Comments dated 10/3/08 on the Draft Additional Data Collection Report in Support of the Ecological Risk Assessment at SWMU 14 dated 6/27/08 would be submitted at a later date. |

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|---|-------------|---|
| #14 Fire Training Pit Area | First Phase | A new airfield background data set is required to complete the work on SWMU 14 and was submitted to EPA on January 6, 2010, Addendum's B and C were developed to address the need for a background freshwater drainage ditch sediment data set and revisions for the surface soil background data set for use in SWMU investigations at the airfield. |
| #16 Building 1666 – Waste Explosives Storage Building | First Phase | A Revised Final RFI Work Plan was submitted to EPA for approval on 10/11/06. This document was approved by the EPA in their letter dated 10/20/06. RCRA Field Investigation was conducted between 11/10 and 11/20/06. The Draft Phase I RFI Report was submitted to the EPA on 3/26/07. The EPA provided comments in a letter dated 6/11/07. Navy responded to comments 8/2/07. Conference call was conducted on 9/20/07. EPA provided comments on responses on 9/24/07. Final Phase I RFI Report submitted to the EPA on 11/10/07. EPA approved the report on 1/7/08. CAC without controls approved by the EPA 1/7/08. |
| #18 Building 2009 - DRMO | First Phase | Navy submitted land use control letter for the DRMO facility to the EPA on 5/30/07. The EPA accepted the DRMO closure of CAC without controls in their letter dated 6/11/07. |
| #19 Building 121 - Discarded Pest Storage Area | Contingent | RCRA closure approved by EPA – no further action. |
| #23 Oil Spill Separator Tanks | First Phase | RFI complete. No comments. No further action proposed in Part B permit renewal. Corrective Action Complete with Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #24 Oil Spill Oil/Water Separator & Adjoining Pad | First Phase | RFI complete. No comments. No further action proposed in Part B permit renewal. Corrective Action Complete without Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #25 DRMO Storage Yard | First Phase | Further action deferred to permitted unit site closure. DRMO Permitted facilities are currently undergoing closure. Per discussions with EPA, as long as the DRMO permitted facilities are closed in accordance with the permit, no further action will be required on this SWMU. Navy submitted land use control letter for the DRMO facility to the EPA on 5/30/07. The EPA accepted the DRMO closure of corrective action complete with controls in their letter dated 6/11/07. |
| #26 Building 544 Area | First Phase | RFI approved 10/99. No further action proposed in Part B permit renewal. Corrective Action Complete without Controls stated in 1/29/07 RCRA § 7003 Administrative Order on Consent. |

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|--------------------------------------|-------------|---|
| #27 Capehart WWTP Sludge Drying Beds | First Phase | A Revised Final RFI Work Plan for SWMU 27 was submitted to EPA for approval on 10/11/06. This document was approved by the EPA in their letter dated October 20, 2006. RCRA Field Investigation was conducted between 11/10 and 11/20/06. The Draft Phase I RFI Report for SWMU 27 was submitted to the EPA for review and comment on 4/6/07. The EPA provided comments to the Navy on the Draft Phase I RFI Report for SWMU 27 in a letter dated 6/28/07. Draft Full RFI Work Plan for SWMUs 27, 28, and 29 was submitted 8/31/07. EPA provided comments on the Final Phase I RFI Report for SWMU 27 and approved the Draft Full RFI Work Plan for SWMUs 27, 28, and 29 on 1/7/08. Navy submitted Revised Final Phase I RFI Report for SWMU 27 on 1/25/08. Field work for SWMU 27 was initiated on 2/10/08 with regard to the Full RCRA Facility Investigation Work Plan for SWMUs 27, 28, and 29. The Draft Full RFI report for SWMU 27 was submitted to the EPA on 6/24/08. EPA provided comments on the Draft Full RFI Report for SWMU 27 7/23/08. The Final Full RFI Report for SWMU 27 was submitted to the EPA on 8/28/08 and approved by the EPA on 10/3/08. A CMS investigation and CMS needs to be conducted at this SWMU. Development of the CMS Work Plan has been initiated. The Draft Corrective Measures Study Work Plan for SWMUs 27, 28, and 29 was submitted to the EPA on 12/16/10 |
| #28 Bundy WWTP Sludge Drying Beds | First Phase | A Revised Final RFI Work Plan for SWMU 28 was submitted to EPA for approval on 10/11/06. This document was approved by the EPA in their letter dated 10/20/06. RCRA Field Investigation was conducted between 11/10 and 11/20/06. The Draft Phase I RFI Report for SWMU 28 was submitted to the EPA for review and comment on 3/26/07. The EPA provided comments to the Navy on the Draft Phase I RFI for SWMU 28 in a letter dated 6/28/07. Draft Full RFI Work Plan for SWMUs 27, 28, and 29 was submitted 8/31/07. Field work for SWMU 28 was initiated on 2/10/08 with regard to the Full RCRA Facility Investigation Work Plan for SWMUs 27, 28, and 29. The Draft Full RFI report for SWMU 28 was submitted to the EPA on 6/24/08. EPA provided comments on the Draft Full RFI Report for SWMU 28 7/23/08. The Final Full RFI Report for SWMU 28 was submitted to the EPA on 8/28/08 and approved by the EPA on 10/3/08. A CMS investigation and CMS needs to be conducted at this SWMU. Development of the CMS Work Plan has been initiated. The Draft Corrective Measures Study Work Plan for SWMUs 27, 28, and 29 was submitted to the EPA on 12/16/10. |

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| SWMU or Area of Concern | RFI Type | Status |
|--|-------------|--|
| #29 Industrial Area WWTP Sludge Drying Beds | First Phase | A Revised Final RFI Work Plan for SWMU 27 was submitted to EPA for approval on 10/11/06. This document was approved by the EPA in their letter dated 10/20/06. RCRA Field Investigation was conducted between 11/10 and 11/20/06. The Draft Phase I RFI Report for SWMU 29 submitted to the EPA for review and comment on 4/6/07. The EPA provided comments to the Navy on the Draft Phase I RFI Report for SWMU 29 in a letter dated 6/28/07. Draft Full RFI Work Plan for SWMUs 27, 28, and 29 was submitted 8/31/07. EPA provided comments on the Final Phase I RFI Report for SWMU 27 and approved the Draft Full RFI Work Plan for SWMUs 27, 28, and 29 on 1/7/08. Navy submitted Revised Final Phase I RFI Report for SWMU 27 on 1/25/08. Field work for SWMU 29 was initiated on 2/10/08 with regard to the Draft Full RCRA Facility Investigation Work Plan for SWMUs 27, 28, and 29. The Draft Full RFI report for SWMU 29 was submitted to the EPA on 6/24/08. EPA provided comments on the Draft Full RFI Report for SWMU 29 7/23/08. The Final Full RFI Report for SWMU 29 was submitted to the EPA on 8/28/08 and approved by the EPA on 10/3/08. A CMS investigation and CMS needs to be conducted at this SWMU. Development of the CMS Work Plan has been initiated. The Draft Corrective Measures Study Work Plan for SWMUs 27, 28, and 29 was submitted to the EPA on 12/16/10. |
| #30 Former Incinerator | First Phase | RFI completed and approved 1/20/00. A letter regarding Land Use Controls for SWMU 30 was sent to the EPA on 4/26/07. No further action proposed in Part B permit renewal. Corrective Action Complete with Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #31 Waste Oil Collection Area/Building 31 and 2022 | First Phase | RFI additional investigation performed 9/97. Draft RFI Report for Additional Investigations completed 5/6/98. EPA comment letter 9/15/98 indicated the need for a CMS. Final CMS Final Report submitted 4/17/00 and EPA approved 5/4/00. Final CMI Work Plan Design Package submitted 1/25/01 and EPA approved 5/4/01. A letter regarding Land Use Controls for SWMU 31 was sent to the EPA on 4/26/07. CMI remains to be implemented. |
| #32 PWD Storage Yard/Battery Collection Area | First Phase | A letter regarding Land Use Controls for SWMU 32 was sent to the EPA on 4/26/07. [See SWMU 31] |
| #37 Waste Oil Storage Area/Building 200 | First Phase | RFI complete EPA comment letter 11/8/96. Responded to EPA comments 1/20/97. A letter regarding Land Use Controls for SWMU 37 was sent to the EPA on 4/26/07. No further action proposed in Part B permit renewal. Corrective Action Complete with Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |

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| SWMU or Area of Concern | RFI Type | Status |
|---|-------------|---|
| #39 Building 3158/Former Battery Drain Area | First Phase | RFI complete. No comments. No further action proposed in Part B permit renewal. Corrective Action Complete with Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #42 Water Purification Plant Lagoons | First Phase | A Final RFI Work Plan for SWMU 42 was submitted to EPA for approval on 10/11/06. This document was approved by the EPA in their letter dated 10/20/06. RCRA Field Investigation was conducted between 11/10 and 11/20/06. The Draft Phase I RCRA Facility Investigation Report for SWMU 42 was submitted to the EPA on 3/23/07. EPA provided comments on the Draft RFI for SWMU 42 in a letter dated 6/11/07. Navy responded to comments 8/2/07. Conference call was conducted on 9/20/07. EPA provided comments on responses on 9/24/07. Final Phase I RFI Report was submitted to the EPA on 11/20/07. EPA provided comments on the Final Phase I RFI Report for SWMU 42 on 1/7/08. Navy submitted Revised Final Phase I RFI Report for SWMU 42 on 1/25/08. EPA approved the Phase I RFI Report on 2/26/08. CAC with Controls for removing sediment from lagoons upon plant closure. |
| #45 PCB Spill Area/Old Power Plant | Full | Revised Draft RFI Report for OU 3/5 completed 4/1/99 and EPA approved 9/28/99. CMS for Puerca Bay sediments is planned. Revised Final II CMS Work Plan submitted 7/14/00 and EPA approved 5/4/01. CMS initiated. Draft Screening-Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate submitted 8/10/01. Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment submitted 8/10/01. EPA commented 10/4/01 approving the Draft Additional Data Collection Work Plan in Support of Ecological Risk Assessment. Addendum to the Draft Screening-Level Ecological Risk Assessment Problem Formulation (Step 1) and Exposure Estimate, including response to comments submitted 5/22/03. EPA provided contingent approval 6/10/03. Field investigation initiated 7/23/03 and completed 8/8/03. Draft Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment submitted 1/30/04. EPA comment letter dated 4/9/04. Navy preliminary response to comment letter submitted via e-mail on 5/21/04. Navy letter to EPA submitted 6/2/04 regarding the due date of Navy's official response to EPA comments. EPA comments received via e-mail on 6/11/04. Conference call held on 6/21/04. Revised Navy response to comment letter submitted via e-mail on 7/9/04. EPA approved Navy's revised response to comments on 7/16/04. Formal Navy response to EPA comment letter dated 4/9/04 submitted 7/23/04. EPA comments received via e-mail on 7/30/04. Conference call held on 7/30/04. EPA comment letter dated 8/20/04. Draft Final Additional Data Collection Report |

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| SWMU or Area of Concern | RFI Type | Status |
|--|----------|---|
| #45 PCB Spill Area/Old Power Plant (cont.) | Full | <p>and Screening level Ecological Risk Assessment and Step 3a of Baseline Ecological Risk Assessment submitted 9/22/04. Navy letter was submitted to EPA on 1/12/05 providing a revised schedule for ecological work. Navy letter was submitted to EPA on 3/8/05 providing a revised schedule for ecological work. EPA comments dated 3/30/05 on the Draft Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA received 4/4/05. Response to comments being developed. EPA submitted a comment letter on 7/13/05 addressing the SWMU 45 Draft Final Additional Data Collection Report and Screening Level Ecological Risk Assessment and Step 3a of the BERA. The EPA determined that the responses for SWMU 45 were not fully acceptable as discussed in a Technical Review. A revised response letter was requested by EPA. Responses to EPA's comments dated 7/13/05 on the Navy's 5/19/05 Responses to EPA's 3/30/05 comments on the SWMU 45 Draft Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA were submitted to the EPA on 9/9/05. The Final Additional Data Collection Report and Screening Level ERA and Step 3a of the Baseline ERA was submitted to the EPA on 1/11/06. Initiation of Steps 3b and 4 will commence upon EPA approval. The Draft Steps 3b and 4 of the Baseline Ecological Risk Assessment was submitted to the EPA for review and comment on 4/20/06. On 6/22/06, EPA issued a Comment Letter on The Draft Steps 3b and 4 of the Baseline ERA and requested an updated schedule for this SWMU. The Final Steps 3b and 4 of the Baseline ERA was submitted to the EPA for review and approval On 7/23/06. Also submitted with this document was the Navy Responses to EPA Comments dated 6/22/06 and an updated schedule. The EPA provided preliminary approval of the Final Steps 3b and 4 of the Baseline Ecological Risk Assessment SWMU 45 via e-mail on 8/15/06 and issued a Comment Letter dated 8/17/06 approving SWMU 45 Steps 3b and 4 of the Baseline ERA, dated 7/26/06. The field verification for the Ecological Risk Assessment was initiated on 9/18/06 with the evaluation submitted to the EPA on 12/15/06. The Baseline ERA field investigation was initiated on 1/27/07 and completed on 2/2/07. The Draft Steps 6 and 7 of the Baseline ERA was submitted to EPA 2/26/08. EPA provided comments 5/13/08. The Final Steps 6 and 7 of the Baseline ERA was submitted to EPA 7/11/08 and approved by the EPA on 10/3/08. An addendum to the Final Steps 6 and 7 of the Baseline ERA and the Navy Responses to EPA Comments dated 10/3/08 were submitted to the EPA on 11/21/08 and approved by the EPA on 1/15/09. The Draft CMS Report for SWMU 45 was submitted to the EPA on 7/22/10. EPA commented in a letter dated 10/14/10. The Draft Final Corrective Measures Study Final Report was submitted to the EPA on 12/17/10.</p> |

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| SWMU or Area of Concern | RFI Type | Status |
|--|-------------|---|
| #46 Pole Storage Yard Covered Pad | First Phase | Draft RFI Report for Additional Investigations for OUs 1, 6, and 7 completed 5/6/98. EPA approved 5/6/98 report and requested CMS 9/15/98. Combined with AOC C for CMS. Revised Final II CMS Final Report submitted 8/4/00 and EPA approved 9/15/00. 100% Final CMI Work Plan Design Package submitted 1/25/01 and EPA approved 5/4/01. EPA to send CMI Work Plan out for public comment. Navy letter submitted to EPA on 1/12/05 indicating that the Navy intends to pursue the performance of the CMI. The CMI for soil removal was initiated April 2006. Navy submitted the Proposed Airfield Schedule to EPA on 12/3/08 including the completion of remedial activities at SWMU 46. Backfill of the excavated area was initiated on 1/12/09. Draft Project Closeout Report Remedial Action for Soil Remediation submitted to the EPA on 12/4/09. EPA provided comments dated 3/11/10. The Final Project Closeout Report and Draft Statement of Basis was submitted to EPA 8/6/10. Received EPA comments (via e-mail from Mr. Tim Gordon) on 10/19/10. The Final Statement of Basis was submitted to EPA 10/27/10. |
| #51 New AIMD Storage Pad/Building 379 | First Phase | RFI complete. No comments. No further action proposed in Part B permit renewal. Corrective Action Complete with Controls as stated in the 1/29/07 RCRA § 7003 Administrative Order on Consent. |
| #53 Malaria Control Building/Building 64 | First Phase | Draft Sampling and Analysis Plan submitted 8/4/00 and EPA approved 10/10/00. Field investigations performed in December 2000. Draft Sampling and Analysis Report submitted 4/11/01. EPA comment letter 7/5/01. Final RFI Work Plan submitted 12/6/01 and EPA approved 1/3/02. Fieldwork initiated 2/11/02 and completed 3/14/02. Draft RFI Report submitted 7/17/02. EPA commented 9/19/02 providing contingent approval of the Draft RFI Report and requesting a CMS work plan be submitted. Draft CMS Work Plan submitted 11/27/02. EPA comment letter 2/19/03. Final CMS Work Plan submitted 3/7/03 and EPA approved 6/3/03. Replacement pages constituting the Final RFI Report submitted 7/23/03. Draft CMS Final Report submitted 7/23/03. Draft CMSI Report submitted 7/23/03. EPA comments received 10/23/03. Final CMS Final and Final CMSI Reports, as well as response to comment letter submitted 11/24/03. |

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| SWMU or Area of Concern | RFI Type | Status |
|--|-------------|---|
| #53 Malaria Control Building/Building 64 (cont.) | First Phase | EPA letter dated 1/30/04 approved CMS Final Report and CMS Investigation Report. 100% CMI Design Package submitted 3/19/04. EPA comment letter 6/3/04. Final CMI Design Package and response to comment letter submitted 7/13/04. EPA comment letter dated 8/20/04. Formal response to comments including an Addendum to the Final CMI Design Package submitted 9/20/04. Navy letter submitted to EPA on 1/12/05 indicating that the Navy intends to pursue the performance of the CMI. EPA requested additional copies of CMI Design package 2/1/05. Additional copies submitted to EPA 2/16/05. Navy letter submitted to EPA on 1/12/05 indicating that the Navy intends to pursue the performance of the CMI. EPA approved CMI Design package 3/30/05. The CMI for soil removal was initiated April 2006. Backfill of the excavated area was initiated on 1/12/09. Draft Project Closeout Report Remedial Action for Soil Remediation submitted to the EPA on 12/4/09. EPA provided comments dated 3/11/10. The Final Project Closeout Report and Draft Statement of Basis was submitted to EPA 8/6/10. Received EPA comments (via e-mail from Mr. Tim Gordon) on 10/19/10. The Final Statement of Basis was submitted to EPA 10/27/10. |
| #54 Former NEX Repair/Maintenance Shop/Building 1914 | First Phase | Draft Sampling and Analysis Plan submitted 8/4/00 and EPA approved 10/10/00. Field investigations performed in December 2000. Draft Sampling and Analysis Report submitted 4/11/01. EPA comment letter 7/5/01. Final RFI Work Plan submitted 12/6/01 and EPA approved 1/3/02. Fieldwork initiated 2/11/02 and completed 3/14/02. Draft RFI Report submitted 7/17/02. EPA commented 9/19/02 providing contingent approval of the Draft RFI Report and requesting a CMS work plan be submitted. Draft CMS Work Plan submitted 11/27/02. EPA comment letter 2/19/03. Final CMS Work Plan submitted 3/7/03 and EPA approved 6/3/03. Replacement pages constituting the Final RFI Report submitted 7/23/03. Conference call held on 7/21/04. Draft CMS Final Report submitted 10/28/04. Received EPA comments 1/7/05. Navy preliminary responses to EPA comments dated 1/7/05 were submitted via e-mail on 2/14/05. EPA provided comments on the responses on 3/11/05. Navy requested conference call to discuss comments and responses on 3/15/05. Conference call held 3/17/05. Revised Navy preliminary responses to EPA comments dated 1/7/05 were submitted via e-mail on 3/23/05. EPA provided preliminary comments on the responses on 4/5/05. Navy official responses to EPA comments dated 1/7/05 were submitted 4/8/05. Prepare and submit Final CMS Final Report upon EPA approval of response to comments. |

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| SWMU or Area of Concern | RFI Type | Status |
|--|-------------|--|
| #54 Former NEX Repair/Maintenance Shop/Building 1914 (cont.) | First Phase | In accordance with the EPA comment letter dated 7/13/05, the 4/8/05 responses on the October 2004 Draft CMS Report were considered acceptable. The Navy has initiated work to incorporate the responses into the Final CMS Final report The Final CMS Final Report for SWMUs 54 and 55 was submitted to the EPA for review and comments on 8/26/05. EPA comments dated 10/13/05 approving the Final CMS Final Report were received by the Navy on 10/17/05. The CMI was initiated July 2009. Project Plans have been approved by the Navy. Pilot Test included the injections of emulsified vegetable oil. Complete the injections and modify their effectiveness. Installed injection and monitoring wells, completed pilot EOS injection at the TCE plume, conducted baseline groundwater sampling prior to pilot test, and continued to monitor the effectiveness of the EOS pilot injection. The Amended Final Sampling and Analysis Plan for the Pilot Test at SWMUs 54 and 55 was submitted to the EPA on 1/31/11. |
| #55 TCE Plume near Tow Way Fuel Farm | Full | Draft TCE Plume Source Delineation Work Plan submitted 5/8/03. EPA comment letter dated 6/10/03. Final TCE Plume Source Delineation Work Plan submitted 7/25/03. Response to EPA comment letter submitted 8/11/03. Field investigation initiated 9/12/03 and completed 9/28/03. Draft TCE Plume Delineation and Source Investigation Report submitted 1/21/04. EPA comment letter dated 2/24/04 regarding the Draft TCE Plume Delineation and Source Investigation Report. Comment letter requested the potential source area and associated TCE plume be designated as SWMU 55. Navy preliminary response to comment letter submitted via e-mail on 6/23/04. Conference call held on 7/21/04. Final TCE Plume delineation and Source Investigation Report and responses to EPA's 2/24/04 comment letter submitted 8/11/04. EPA comment letter dated 9/1/04. Draft CMS Final Report submitted 10/28/04. EPA commented 1/7/05. Navy preliminary responses to EPA comments dated 1/7/05 were submitted via e-mail on 2/14/05. EPA provided comments on the responses on 3/11/05. Navy requested conference call to discuss comments and responses on 3/15/05. Conference call held 3/17/05. Revised Navy preliminary responses to EPA comments dated 1/7/05 were submitted via e-mail on 3/23/05. EPA provided preliminary comments on the responses on 4/5/05. Navy official responses to EPA comments dated 1/7/05 were submitted 4/8/05. Prepare and submit Final CMS Final Report upon EPA approval of response to comments. |

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| SWMU or Area of Concern | RFI Type | Status |
|--|-------------|---|
| #55 TCE Plume near Tow Way Fuel Farm (cont.) | Full | In accordance with the EPA comment letter dated 7/13/05, the 4/8/05 responses on the 10/04 Draft CMS Report were considered acceptable. The Navy has initiated work to incorporate the responses into the Final CMS Final report. The Final CMS Final Report for SWMUs 54 and 55 was submitted to the EPA for review and comments on 8/26/05. EPA comments dated 10/13/05 approving the Final CMS Final Report were received by the Navy on 10/17/05. The CMI was initiated July 2009. Project Plans have been approved by the Navy. Pilot Test included the injection of permanganate. Complete the injections and monitor their effectiveness. Completed installation of injection wells. Continued to monitor effectiveness of permanganate injections. The Draft Final Corrective Measures Study Addendum, the Draft Final Corrective Measures Implementation Plan, and the Amended Final Sampling Plan for the Pilot Test (at SWMUs 54 and 55) were submitted to the EPA on 1/31/11. |
| #56 Hanger 200 Apron | First Phase | Draft CMS Work Plan was submitted to the EPA on 7/31/07. EPA commented on 10/2/07. Final CMS Work Plan submitted to the EPA on 12/6/07. EPA approved work plan 4/10/08. Field work was completed in the spring of 2008. Pre-excavation surface soil sampling was completed 9/22/08. The Draft CMS Report was submitted to the EPA on 9/26/08. On 12/3/08 the Navy submitted a letter to the EPA requesting the retraction of Draft CMS Reports for SWMUs 56 and 69. The retraction was due to soil disturbance activities within these SWMUs by the Puerto Rico Ports Authority. Functional Assessment and Supplemental Sediment Sampling results were submitted to the EPA on 12/3/09. EPA commented on 2/18/10. Navy responded 4/23/10 to EPA comments. EPA commented on 5/11/10. The Navy requested a schedule extension for the Revised Draft CMS Report in a letter to the EPA dated 7/2/10. A Revised Draft CMS Report was submitted to the EPA 10/29/10. |
| #57 Facility No. 278 POL Drum Storage Area | First Phase | Final Phase I RFI Work Plan to EPA 12/20/07. EPA approved Work Plan 4/10/08. Mobilized for Phase I RFI field investigation 1/26/10. The Draft Phase I RFI Report was submitted to EPA 8/13/10. EPA commented in a letter dated 10/7/10. The Final Phase I RFI was submitted to the EPA on 11/24/10. |
| #59 Former Vehicle Maintenance & Refueling | First Phase | Final CMS Work Plan submitted to the EPA on 12/6/07. EPA approved work plan 4/10/08. Mobilized for the CMS field investigation on 4/19/10. Initiate development of the Draft CMS Report. |
| #60 Former Landfill at the Marina | First Phase | Final Phase I RFI Work Plan submitted to the EPA on 12/20/07. EPA commented 2/26/08. Navy responded to comments on 4/17/08. EPA approved work plan 5/13/08. The fieldwork was |

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|--|-------------|--|
| #60 Former Landfill at the Marina (cont.) | First Phase | completed January 2009. The Draft Phase I RFI Report was submitted to the EPA 6/18/09. EPA commented on 8/6/09. Responses to 8/6/09 EPA comments submitted to EPA on 9/25/09. |
| #61 Former Bundy Area Maintenance Facilities | First Phase | Final CMS Work Plan submitted to the EPA on 12/6/07. EPA approved work plan 4/10/08. Field work was initiated on 5/27/08. The Draft CMS Report is postponed due to additional characterization of the freshwater wetland being required. The Navy proposed additional sampling in a letter to the EPA dated 10/7/09. EPA commented on Additional Sampling Proposal on 12/15/09. A revised proposal for Additional Sampling was submitted to EPA 1/8/10. Field work was completed February 2010. EPA commented 2/18/10 on the proposal. Navy responded 3/11/10. Development of the Draft CMS Report is underway. The Navy submitted an extension request to the EPA for Draft CMS Report on 11/1/10. |
| #62 Former Bundy Disposal Area | First Phase | Final Phase I RFI Work Plan submitted to the EPA on 12/20/07 and approved on 5/13/08. Field work initiated on 5/27/08. The Draft Phase I RFI Report was submitted to the EPA on 2/6/09. The EPA commented on 4/23/09. The Final Phase I RFI Report and Navy responses to EPA and PREQB comments submitted to the EPA on 10/29/09. EPA commented on Final Phase I RFI on 12/15/09. Revised Final Phase I RFI submitted to EPA on 1/13/10 and approved 2/18/10. Navy requested schedule extension for Full RFI Work Plan 2/19/10. Full RFI Work Plan submitted to the EPA on 6/18/10. EPA commented in a letter dated 8/24/10. The Final Full RFI Work Plan submitted to the EPA on 10/14/10. |
| #67 Former Gas Station | First Phase | Final Phase I RFI Work Plan submitted to the EPA on 12/20/07. EPA approved Work Plan 4/10/08. Field work was completed in March 2010. The Draft Phase I RFI Report was submitted to the EPA 10/29/10. |
| #68 Former Southern Fire Training Area | First Phase | The Draft RFI Work Plan was submitted to the EPA for review and comment on 10/25/06. The EPA approved the Draft Phase I RFI Work Plan. RCRA Field Investigation was conducted between 11/10 and 11/20/06. The Draft Phase I RCRA Facility Investigation Report was submitted to the EPA on 3/26/07. EPA commented in a letter dated 5/29/07. Additional surface soil samples collected to delineate Arsenic on 9/27/07. Additional surface soil samples also collected on 10/24/07 to delineate lead, copper and zinc. Each sampling event was conducted as part of the Phase I RFI. The Revised Final Phase I RFI Report submitted to the EPA 7/11/08. Pre-excavation surface soil sampling for airfield remediation was conducted the week of 9/22/08. The Draft CMS Report was submitted to the EPA on 10/28/08. The Draft Final CMS Final Report and Navy responses to EPA comments dated 1/15/09 were submitted to the EPA on 3/5/09. The EPA and |

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| SWMU or Area of Concern | RFI Type | Status |
|--|-------------|---|
| #68 Former Southern Fire Training Area (cont.) | First Phase | PREQB commented in a letter dated 4/23/09. The Final CMS Final Report was submitted to the EPA 6/2/09. EPA approved the CMS on 8/6/09. The Draft Statement of Basis was submitted to the EPA 9/30/09. The Draft CMI Design Package was submitted to the EPA on 11/19/09. EPA commented on the Draft CMI Plan and Design on January 28, 2010. The Final CMI Design Package and Work Plan were submitted to the EPA on 5/14/10. The EPA commented in a letter dated 6/16/10. The Revised Final CMI Work Plan and Design Package submitted to EPA on 9/3/10. EPA commented in a letter dated 10/14/10. The Final Statement of Basis was submitted to the EPA on 10/27/10. On 1/12/11 a wetland delineation was performed for the area adjacent to the SWMU 68 in anticipation of soil removal activities. |
| #69 Aircraft Parking Area | First Phase | Final CMS Work Plan submitted to the EPA on 12/6/07. EPA approved work plan 4/10/08. Field work was initiated on 4/28/08. The Draft Corrective Measures Study Report was submitted to the EPA 9/12/08. Pre-excavation surface soil sampling for airfield remediation was conducted the week of 9/22/08. On 12/3/08 the Navy submitted a letter to the EPA requesting the retraction of Draft CMS Reports for SWMUs 56 and 69. The retraction was required to due soil disturbance activities within these SWMUs by the Puerto Rico Ports Authority. Draft sampling strategy for disturbed soils submitted to EPA 4/20/10. EPA commented in a letter dated 5/11/10. PREQB provided comments (via e-mail) on 5/25/10. The Final sampling strategy for disturbed soils was submitted to the EPA on 6/18/10. In a letter dated 6/22/10 addressed to the EPA, PREQB found the response to comments on the Draft Soil sampling Strategy for Disturbed Soil acceptable; and the Navy move forward with field activities. The Field work for disturbed soil sampling was initiated on 8/9/10. The Draft CMS Report is currently underway. |
| #70 Disposal Area Northwest of Landfill | First Phase | Final Phase I RFI Work Plan submitted to the EPA on 12/20/07. EPA commented 2/26/08. Navy responded to comments on 4/17/08. EPA approved work plan 5/13/08. The fieldwork was completed in January 2009. The Draft Phase I RFI Report was submitted to the EPA 5/26/09. EPA commented on 8/6/09. Final Phase I RFI submitted to EPA on 11/19/09. EPA approved Phase I RFI 12/15/09. Navy requested schedule extension for Full RFI Work Plan 2/19/10. The Draft Full RFI Work Plan was submitted to the EPA on 6/30/10. The EPA commented in a letter dated 9/16/10. The Final Full RCRA Facility Investigation Work Plan was submitted to the EPA on 11/5/10. |

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| SWMU or Area of Concern | RFI Type | Status |
|-------------------------------------|-------------|---|
| #71 Quarry Disposal Site | First Phase | Final Phase I RFI Work Plan submitted to the EPA on 12/20/07. EPA approved work plan 5/13/08. Field work was initiated on 5/27/08. The Draft Phase I RFI Report was submitted to the EPA on 3/12/09. The EPA commented in a letter dated 4/23/09. The Final Phase I RFI Report was submitted to the EPA on 6/12/09. EPA commented on 8/11/09 approving the Phase I RFI and requested the development of Full RFI Work Plans. On 10/15/09, the Navy submitted an extension request to the EPA for the submission of the Draft Full RFI Work Plan. The Draft Full RFI Work Plan was submitted to the EPA on 6/11/10. EPA commented in a letter dated 8/24/10. The Final Full RFI Work Plan was submitted to EPA 10/21/10. |
| #73 DRMO Scrap Metal Recycling Yard | First Phase | Final CMS Work Plan submitted to the EPA on 1/25/08. EPA approved work plan 4/10/08. Field work initiated 3/28/08 and completed 4/11/08. On 12/3/08 the Navy submitted a letter to the EPA which included a technical memo from the US Army Center for Health Promotion and Preventative Medicine (CHPPM) requesting additional sampling for SWMU 73 CMS Work Plan. This letter and technical memo serve as the addendum to the approved CMS work plan. Additional sampling was conducted in January 2009. On 6/11/09, the Navy submitted an extension request letter to the EPA for the Draft CMS report. The EPA approved the extension on 8/6/09. On 9/29/09, the Navy submitted a second extension request to the EPA for the Draft CMS report. A third extension request was submitted to the EPA on 11/23/09. The Draft CMS report was submitted to the EPA on 2/4/10. EPA commented in a letter dated 5/27/10. |
| #74 Fuel Pipelines and Hydrant Pits | First Phase | Final CMS Work Plan submitted to the EPA on 12/6/07. EPA approved work plan 4/10/08. Field work was initiated on 4/28/08. The Draft Phase I of the CMS Investigation Report was submitted to EPA on 11/19/09. EPA commented on the Draft Phase I of the CMS Investigation on 1/22/10. The Final Phase I of the CMS Investigation – Fuel Pipelines and Hydrant Pits was submitted to the EPA 3/26/10. The EPA commented in a letter dated 5/27/10. The Revised Final Phase I of the CMS Investigation – Fuel Pipelines and Hydrant Pits was submitted to the EPA 7/9/10. The EPA commented in a letter dated 9/16/10. The Revised Final Phase I of the CMS Investigation – Fuel Pipelines and Hydrant Pits was submitted to the EPA 10/21/10. |
| #75 Building 803 | First Phase | Final Phase I RFI Work Plan was submitted 12/10/07. EPA approved work plan 4/10/08. Field work was completed March 21, 2010. The Draft Phase I RFI Report submitted to EPA 8/26/10. The EPA commented in a letter dated 12/8/10. |

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**NAVAL ACTIVITY PUERTO RICO CORRECTIVE ACTION PROGRAM
SWMU/AOC STATUS
AUGUST 31, 2010**

| SWMU or Area of Concern | RFI Type | Status |
|---|-------------|---|
| #76 Building 2300 | First Phase | Draft Phase I RFI Work Plan for SWMU 76 was submitted to the EPA on 8/31/07. EPA commented on 10/18/07. Navy requested extension until October 31, 2008. The Final Phase I RFI Work Plan was submitted to the EPA on 3/31/09. The EPA commented in a letter dated 4/23/09, while the PREQB commented in a separate letter dated 6/5/09. Conference call was conducted on 6/16/09. The Revised Final Phase I RFI Work Plan was submitted (in accordance with the 6/16/09 conference call) to the EPA on 7/24/09. The EPA commented in a letter dated 8/11/10. |
| #77 Small Arms Range and Possible Former Open Burning/Open Detonation Areas | First Phase | The Draft Phase I RCRA Facility Investigation Work Plan for SWMU 77 is scheduled for submission to the EPA within 90 days of cessation of use of the range. On 4/15/09 the Navy submitted a modified extension request letter to the EPA until 10/30/09. On 10/22/09, the Navy submitted an extension request to the EPA for the submission of the Draft Phase I RFI Work Plan. A Draft Sampling and Analysis Plan was submitted to EPA 11/6/09. The Draft Phase I RFI was submitted to the EPA on 11/9/09. Notification of Small Arms Closure 11/9/09. EPA commented on the Draft Sampling and Analysis Plan on 1/22/10. The Final Sampling and Analysis Plan was submitted to the EPA on 3/23/10. Planning for the Phase I RFI field work was initiated. Field work in support of the archeological dig was completed and the tech memorandum documenting the effort was issued. Field work associated with the Phase I RCRA Facility Investigation was conducted from May 9-28, 2010. On 5/27/10, the EPA provided comments on the Final Sampling and Analysis Plan. On 10/28/10 the Phase I RFI Report (including the response to comments regarding the Phase I RFI SAP) for SWMU 77 – Small Arms Range was submitted to the EPA. Began addressing advance copy of PREQB comments on the Phase I RCRA Facility Investigation Report. |
| #78 - Pole Yard | First Phase | The Final Phase I RFI Work Plan was submitted to the EPA 4/25/08. EPA approved work plan 5/13/08. Field work was initiated on 5/27/08. The Draft Phase I RFI Report was submitted to the EPA on 2/26/09. The EPA commented in a letter dated 4/23/09, while the PREQB commented in a separate letter dated 4/30/09. The Final Phase I RFI Report was submitted to the EPA 6/12/09. EPA commented 8/11/09 approving the Phase I RFI and requested the development of Full RFI Work Plans. On 10/15/09, the Navy submitted an extension request to the EPA regarding the submission of the Draft Full RFI Work Plan. The Draft Full RFI Work Plan submitted to the EPA 4/29/10. The EPA commented in a letter dated 6/16/10. 127 non-hazardous transformers were disposed of during the May 1, 2010 – July 31, 2010 quarter. The Final Full RFI Work Plan submitted to EPA 10/14/10. |

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**NAVAL ACTIVITY PUERTO RICO CORRECTIVE ACTION PROGRAM
SWMU/AOC STATUS
AUGUST 31, 2010**

| SWMU or Area of Concern | RFI Type | Status |
|---------------------------------------|-------------|--|
| 79 – Cabras Island | First Phase | Notice of Newly Discovered Release of Potential Hazardous Constituents 11/19/2009. The Draft Phase I RFI Work Plan was submitted to EPA 8/20/10. The Final Phase I RFI Work Plan submitted to EPA 12/15/10. |
| 80 – Drainage Ditch Near Building 207 | First Phase | Navy requests that SWMU 56A be re-designated as new SWMU 80 in a letter to EPA dated 7/2/2010. The Draft Phase I RFI Work Plan was submitted to EPA 8/17/10. EPA commented in a letter dated 10/7/10. The Final Phase RFI Work Plan submitted to EPA 11/24/10. |
| AOC A/Torpedo Shop | First Phase | A Revised Final RFI Work Plan for AOC A was submitted to EPA for approval on 10/11/06. This document was approved by the EPA in their letter dated 10/20/06. RCRA Field Investigation was conducted between 11/10 and 11/20/06. The Draft Phase I RCRA Facility Investigation Report for AOC A - Torpedo Shop was submitted to the EPA on 4/25/07. The EPA provided comments on the Final RFI Report for AOC A in a letter dated 6/11/07. Navy responded to comments 8/2/07. Conference call was conducted on 9/20/07. EPA provided comments on responses on 9/24/07. Final Phase I RFI Report was submitted to the EPA on 11/20/07. EPA approved RFI Report 2/26/08. CAC with controls interior of building and CAC without controls on the exterior. |
| AOC B/Building 25 | Full | RFI complete EPA comment letter 11/5/99. Draft CMS Work Plan submitted 1/7/00 and EPA approved 3/15/00. Draft CMS Final Report submitted 5/30/00. EPA comment letter 7/5/00. Responded to EPA comments 8/22/00. Draft Final CMS Final Report submitted 11/30/00. EPA comment letter 5/4/01. Final CMS Final Report and response to comments submitted 6/21/01. No further action recommended in RCRA Permit Renewal. The Navy submitted an e-mail on 7/21/04 to the EPA requesting the status of the EPA's review of this document. EPA will provide official determination on this site in a §7003 order that will replace the existing Part B Permit. Corrective Action Complete without Controls as stated in the 1/29/07 RCRA §7003 Administrative Order on Consent. |
| AOC C/Transformer Storage Pad | First Phase | Additional investigations performed to recharacterize site after inadvertent soil removal activity. Draft RFI Report for Additional Investigations for OUs 1, 6, and 7 completed 5/6/98. EPA approved 5/6/98 report and requested CMS 9/15/98. Revised Final II CMS Final Report submitted 8/4/00 and EPA approved 9/15/00. 100% Final CMI Work Plan Design Package submitted 1/25/01 and EPA approved 5/4/01. EPA to send CMI Work Plan out for public comment. Navy letter submitted to EPA on 1/12/05 indicating that the Navy intends to pursue the performance of the CMI. The CMI for soil removal was initiated April 2006. Navy submitted the Proposed Airfield Schedule to EPA on 12/3/08 including the completion of remedial activities at SWMU 46. Backfill was initiated on 1/12/09. Draft Project Closeout Report Remedial Action for Soil |

TABLE 1-1

**NAVAL ACTIVITY PUERTO RICO CORRECTIVE ACTION PROGRAM
SWMU/AOC STATUS
AUGUST 31, 2010**

| SWMU or Area of Concern | RFI Type | Status |
|---|-------------|---|
| AOC C/Transformer Storage Pad (cont.) | First Phase | Remediation submitted to EPA 12/4/09. EPA provided comments dated 3/11/10. The Revised Closeout Report is under development. |
| AOC D/Ensenada Honda Sediments | First Phase | The Draft RFI Report for Additional Investigations for OUs 1, 6, and 7 was completed 5/6/98 and approved by EPA on 2/12/99. No further action proposed in Part B permit renewal. Corrective Action Complete without Controls as stated in the 1/29/07 RCRA §7003 Administrative Order on Consent. |
| AOC E/Offshore Islands of Piñeros and Cabeza de Perro | First Phase | The Navy notified EPA on 8/28/06 that suspected munitions or explosives devices were uncovered at AOC E (Piñeros Island) and the immediate response was completed on 8/30/2006. Phase I Anomaly location investigation fieldwork completed 9/06. Prepare and submit to Naval Ordnance Safety and Security Activity AOC E Draft Explosive Safety Submission. Prepare and submit the Draft AOC E Phase I RFI Anomaly Investigation. Biological Assessment for MEC for removal on AOC E – Pineros Island submitted 1/6/10. Draft Addendum No.1 for Terrestrial Intrusive Investigation Work Plan to conduct Phase I RFI submitted 1/15/10. Navy informed EPA of a Notice of Detonation of MEC on 4/6/10. EPA commented via e-mail 2/22/10. Final Work Plan submitted 4/14/10. Phase I terrestrial intrusive investigation field work conducted from 3/15/10 – 4/5/10. Draft Phase I RFI Report submitted to EPA 8/20/10. |
| AOC F/Monitored Natural Attenuation Sites 124, 731, 734, 2842E, 1738, 520, 735 and 1995 | Full | The Draft MNA Work Plan for AOC F is due to the EPA 6/29/07. Final MNA Work Plan for AOC F was submitted to EPA on 10/9/07. EPA commented on 12/11/07. Navy responded 2/15/08. EPA approved initial round of sampling 4/10/08. Preparing for well installation and first quarter sampling. The Revised Final MNA Work Plan and Draft Year 6, 1 st Qtr Annual Report were submitted to the EPA on 9/8/08. The EPA provided comments 10/3/08. Field work was initiated for the MNA sites on 11/11/08. The Revised Final II MNA Work Plan, the Final Year 6, 1 st Quarter Annual Report, and the Navy responses to EPA comments dated 10/3/08 were submitted to the EPA on 11/21/08. The Draft Year 6/Quarter 2 Report was submitted to the EPA on 12/3/08. Field work for MNA sites Quarter 4 sampling was initiated on 3/2/09. The Final Year 6/Quarter 2 Report and Navy responses to EPA comments dated 1/15/09 were submitted to the EPA on 3/5/09. The EPA provided comments in a letter dated 4/23/09 on the Final Year 6, Quarter 1 Annual Report, the Navy responses to EPA comments dated 10/3/08, and the Draft Year 6/Quarter 2 Report dated 12/3/08. The EPA commented in a letter dated 4/23/09. |

TABLE 1-1

**NAVAL ACTIVITY PUERTO RICO CORRECTIVE ACTION PROGRAM
SWMU/AOC STATUS
AUGUST 31, 2010**

| SWMU or Area of Concern | RFI Type | Status |
|---|----------|--|
| AOC F/Monitored Natural Attenuation Sites 124, 731, 734, 2842E, 1738, 520, 735 and 1995 (cont.) | Full | The Draft Monitored Natural Attenuation - AOC F, Year 6 4th Quarter Annual Report was submitted to the EPA 5/26/09. The Final Monitored Natural Attenuation - AOC F, Year 6 Quarter 2 Report was submitted to the EPA 6/2/09. The Draft Monitored Natural Attenuation - AOC F, Year 7 Annual Report was submitted to the EPA 8/21/09. The EPA commented on 9/29/09, while the PREQB commented on 9/2/09. The Draft Monitored Natural Attenuation, Year 7 Quarter 2 Report was submitted to the EPA 10/14/09. PREQB reviewed/EPA commented on the Draft MNA Year 7/Quarter 2 Report on 12/10/09, the Final report was submitted to EPA on 12/30/09. The Final MNA Year 7 Annual Report submitted to EPA 12/30/09. Draft MNA Year 7/Quarter 3 report was submitted to EPA 1/6/10. EPA commented on the Draft MNA Year 7/Annual Report on 2/18/10. EPA commented on the Draft Year 7/Quarter 3 report on 3/11/10. Final MNA Year 7/Quarter 3 Report was submitted to the EPA on 4/29/10. Field work for Year 7 Quarter 4 was initiated on 2/15/10. Draft MNA - AOC F, Year 7 Quarter 4 Report was submitted to EPA 4/15/10. Draft MtBE Investigation Work Plan, AOC F Site 1738 was submitted to EPA on 4/29/10. EPA commented in a letter dated 5/11/10. The Draft Year 8 Annual Report was submitted to EPA 9/23/10. Field work for Year 8 Quarter 2 was initiated on 8/6/10. The Draft MNA-Year 8 Quarter 2 Report was submitted to EPA 10/1/10. EPA commented 12/8/10. The Draft MNA – AOC F Year 8 Quarter 3 Report submitted to EPA 12/30/10. The Draft MtBE Investigation Report AOC F – Site 1738 submitted to EPA 1/27/11. |

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.

SECTION 2
SUMMARY OF FINDINGS

The following reports were submitted during this period:

- On November 5, 2010 the Final Full RCRA Facility Investigation Work Plan for SWMU 70 was submitted to the EPA in accordance with comments dated September 16, 2010.
- On November 23, 2010 the RCRA Quarterly Report for the period August 1, 2010 – October 31, 2010 was submitted to the EPA.
- On November 24, 2010 the Final Phase I RCRA Facility Investigation for SWMU 57 was submitted to the EPA in accordance with EPA comments dated October 7, 2010.
- The Final Phase RCRA Facility Investigation Work Plan for SWMU 80 was submitted to the EPA on November 24, 2010 in accordance with EPA comments dated October 7, 2010.
- On December 9, 2010 the Draft Sampling and Analysis Plan for On-Site Construction Support for Debris Removal for SWMU 1 was submitted to the EPA.
- The Draft Semi-Annual Groundwater Monitoring Report SWMU 3 – Former Solid Waste Landfill Facility September 2010 Sampling Event was submitted to the EPA on December 15, 2010.
- On December 15, 2010 the Final Phase I RFI Work Plan for SWMU 79 was submitted to the EPA in accordance with EPA comments dated October 7, 2010.
- On December 16, 2010 the Draft Corrective Measures Study Work Plan for SWMUs 27, 28, and 20 was submitted to the EPA in accordance with EPA comments dated July 23, 2008.
- The Draft Final Corrective Action Objectives for Terrestrial Avian Omnivores and Preliminary Delineation Investigation for SWMUs 1 and 2 was submitted to the EPA on December 16, 2010 in accordance with EPA comments dated October 14, 2010.

- On December 17, 2010 the Draft Final Corrective Measures Study Final Report for SWMU 45 was submitted to the EPA in accordance with EPA comments dated October 14, 2010.
- On December 30, 2010 the Draft Monitored Natural Attenuation – AOC F Year 9 Quarter 3 was submitted to the EPA in accordance with the schedule in the Revised Final II Monitored Natural Attenuation Work Plan AOC F.
- The Draft Work Plan to Conduct Phase I RCRA Facility Investigation, Addendum No.2 – Underwater Intrusive Investigation, Piñeros and Cabeza de Perro Islands was submitted for regulatory review on December 13, 2010.
- On January 5, 2011 the Final Design Package for Interim Corrective Measures for SWMU 2, including the Final Basis of Design, Final Design Drawings, and Final Technical Specifications were submitted to the EPA in accordance with EPA comments dated October 14, 2010.
- On January 27, 2010 the Draft MtBE Investigation Report AOC F – Site 1738 was submitted to the EPA to address MtBE contamination detected in the groundwater at AOC F – Site 1738 during the MNA monitoring activities.
- The Draft Final Corrective Measures Study Addendum for SWMU 55 was submitted to the EPA on January 31, 2011.
- On January 31, 2011 the Draft Final Corrective Measures Implementation Plan for SWMU 55 was submitted to the EPA.
- The Amended Final Sampling and Analysis Plan for the Pilot Test at SWMUs 54 and 55 was submitted to the EPA on January 31, 2011.

SECTION 3
SUMMARY OF CHANGES

No changes were made during this reporting period.

SECTION 4
COMMUNITY RELATIONS SUMMARY

- A Public meeting was held on November 28, 2006 to solicit public interest in joining the RAB for NAPR. This meeting was held at the Ceiba Public Use Center.
- The first RAB Meeting was conducted February 7, 2007 at the Fajardo Public Use Center.
- The second RAB meeting was conducted March 12, 2007 at the La Seyba Club in Ceiba.
- The third RAB meeting was conducted April 12, 2007 at the La Seyba Club in Ceiba.
- The fourth RAB meeting was conducted June 14, 2007 at the Salon de Actos in Naguabo.
- The fifth RAB meeting was conducted August 7, 2007 at the La Seyba Club in Ceiba.
- The sixth RAB meeting was conducted October 25, 2007 at the La Seyba Club in Ceiba, PR.
- The seventh RAB meeting was conducted January 16, 2008 at the La Seyba Club in Ceiba, PR.
- The eighth RAB meeting was conducted April 30, 2008 at the La Seyba Club in Ceiba, PR.
- The ninth RAB meeting was conducted September 9, 2008 at the La Seyba Club in Ceiba, PR.
- The tenth RAB meeting was conducted November 13, 2008 at the La Seyba Club in Ceiba, PR.
- The eleventh RAB meeting was conducted January 13, 2009 at the La Seyba Club in Ceiba, PR.
- The twelfth RAB meeting was conducted March 18, 2009 at the La Seyba Club in Ceiba, PR.
- The thirteenth RAB meeting was conducted May 13, 2009 at the La Seyba Club in Ceiba, PR.
- The fourteenth RAB meeting was conducted on August 19, 2009 at the La Seyba Club in Ceiba, PR.

- The fifteenth RAB meeting was conducted on October 28, 2009 at the La Seyba Club in Ceiba, PR.
- The sixteenth RAB meeting was conducted on January 13, 2010 at the La Seyba Club in Ceiba, PR.
- The seventeenth RAB meeting is was conducted on April 8, 2010 at the La Seyba Club in Ceiba, PR.
- The eighteenth RAB meeting was conducted on July 28, 2010 at the La Seyba Club in Ceiba, PR.
- The nineteenth RAB meeting was conducted November 4, 2010 at the La Seyba Club in Ceiba, PR.
- The twentieth RAB meeting was conducted January 27, 2011 at the La Seyba Club in Ceiba, PR.
- The twenty-first RAB meeting is scheduled March 17, 2011 at the La Seyba Club in Ceiba, PR.

SECTION 5
PROBLEMS ENCOUNTERED/RESPONSE TAKEN

No problems were encountered during this reporting period.

SECTION 6
PERSONNEL CHANGES

No personnel changes were made during this period.

SECTION 7
PLANNED WORK

The following work items associated with the RCRA Corrective Action Program at NAPR are planned for the upcoming reporting period:

- Revisions to reports and response to comment letters as needs dictate.
- Maintain schedule currentness through ongoing revision.
- Continue updating the data for the NAPR program website.
- The RCRA 7003 Administrative Order on Consent Required Quarterly Progress Report for the period November 1, 2010 through January 31, 2011 will be submitted.
- Continue to monitor the effectiveness of the pilot injections at SWMU 54 and 55.
- Measure the thickness of product in the recovery wells and MNA wells at SWMU 7/8 to discern any changes to the overall product mass distribution.
- Sample the SWMU 7/8 MNA wells for MNA parameters.
- Prepare and submit the Final Phase I RFI Report on the Terrestrial Investigation at Pineros and Cabeza de Perro Islands.
- Prepare and submit the Final Phase I RFI Report for SWMU 60.
- Submit the revised Additional Data Collection Report in Support of the Ecological Risk Assessment at SWMU 14.
- Prepare and submit the CMS Report for SWMU 59.
- Prepare and submit of the CMS Report for SWMU 69.
- Submit the Draft CMS Report for SWMU 61.
- Prepare and submit the Draft Site 1738 MtBE Plume Investigation Report (including a Pilot Scale Treatability Study).
- Address EPA comments regarding the Navy's Response to Comments (dated August 13, 2010) on the SWMUs 1 and 2 Interim Corrective Measures (ICM) Work Plans.
- Conduct the Year 8 Quarter 4 sampling for Monitored Natural Attenuation – AOC F and develop and submit the Draft Year 8 Quarter 4 Report.

- Conduct the Semi-Annual Groundwater Monitoring at SWMU3, Former Solid Waste Landfill.
- Continue soil removal activities and collect confirmation samples at SWMU 68.
- Address EPA comments on SWMU 77 Small Arms Range Phase I RFI Report when received. Subsequently, work will be initiated on the Full RFI and a Data Quality Objectives (DQO) meeting will be scheduled.
- Resolve regulatory comments on the SWMU 1 Draft SAP for surface MEC in support of the debris removal effort and finalize the document. Field work will then be initiated.
- Submit the Draft CMS Addendum for SWMU 54 Benzene plume including the technical memos describing the pilot test findings and various product vendors equipment tested.
- Submit the Draft CMI Work Plan for SWMU 54 TCE plume including the technical memos describing the pilot test findings and various product vendors equipment tested.
- Submit responses to regulatory comments and revise the SWMU 7/8 MNA Work Plan.
- Submit responses to regulatory comments and revise the SWMU 7/8 CMI Work Plan.
- Continue to monitor the effectiveness of the pilot injections at SWMU 54 and SWMU 55.
- Measure the thickness of produce in the recovery wells and MNA wells at SWMU 7/8 to discern any changes to the overall product mass distribution.
- Initiate development of the Draft Final Full RFI Report for SWMU 9.
- Submit responses to regulatory comments and submit the Final Phase I RFI Report for SWMU 75.
- Initiate the Full RFI investigation at SWMU 62 following regulator approval of the Final Full RFI Work Plan.
- Initiate the Full RFI investigation at SWMU 70 following regulator approval of the Final Full RFI Work Plan.
- Initiate the Full RFI investigation at SWMU 71 following regulator approval of the Final Full RFI Work Plan.
- Initiate the Full RFI investigation at SWMU 78 following regulator approval of the Final Full RFI Work Plan.

- Initiate the Full Phase II of the CMS investigation at SWMU 74 following regulator approval of the Phase II of the CMS Investigation Work Plan.