Record of Decision
Old Navy Supply Depot, Drum Storage Lot, Polaris Point
Piti, Guam

Department of the Navy
Pacific Division
Naval Facilities Engineering Command
258 Makalapa Drive, Suite 100
Pearl Harbor, Hawaii 96860-3134

September 2002

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FIGURES

ACRONYMS AND ABBREVIATIONS

BCT	BRAC Cleanup Team
BRAC	Base Realignment and Closure
CEM	conceptual evaluation model
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CLEAN	Comprehensive Long-Term Environmental Action Navy
COC	chemical of concern
CTO	contract task order
EBS	environmental baseline survey
EE/CA	engineering evaluation/cost analysis
EPA	Environmental Protection Agency, United States
GEDA	Guam Economic Development Agency
GEPA	Guam Environmental Protection Agency
GLUP	Guam Land Use Plan
GWQS	Guam Water Quality Standards
HI	hazard index
HQ	hazard quotient
NAWQC	National Ambient Water Quality Criteria
NSD	Navy Supply Depot
PACNAVFACENGCOM	Pacific Division, Naval Facilities Engineering Command
PAH	polynuclear aromatic hydrocarbon
PRG	preliminary remediation goal
RAB	restoration advisory board
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
RME	reasonable maximum exposure
ROD	Record of Decision
SERA	screening ecological risk assessment
SWMU	solid waste management unit
TPH	total petroleum hydrocarbon
U.S.	United States
UST	underground storage tank

1. DECLARATION

1.1 SITE NAME AND LOCATION

This record of decision (ROD) has been prepared for the Old Navy Supply Depot Drum Storage Lot, Solid Waste Management Unit (SWMU) #49, (Polaris Point), in Piti, Guam.

1.2 STATEMENT OF BASIS AND PURPOSE

This ROD presents the no further response action decision for Polaris Point. The final decision was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act, and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan. Concurrence with this no further response action ROD by the Guam Environmental Protection Agency (GEPA) is indicated by signature below.

1.3 DESCRIPTION OF THE SELECTED REMEDY

The selected remedy for Polaris Point is no further response action. Polaris Point is already in a protective state for human health and the environment for unrestricted use; therefore, no further response action is necessary. This decision is supported by documents in the administrative record for Polaris Point. The Base Realignment and Closure (BRAC) Cleanup Team (BCT), which consists of representatives of the GEPA, the U.S. Environmental Protection Agency (EPA) Region IX, and the U.S. Navy, are in agreement with this decision.

1.4 DECLARATION STATEMENT

Based upon documents contained in the administrative record for Polaris Point, the BCT, which consists of representatives of GEPA, EPA Region IX, and the Navy, concluded that no further response action is necessary for the protection for human health or the environment at Polaris Point. Therefore, no further response action is the selected remedy for Polaris Point.

The U.S. Navy has determined that Polaris Point is already in a protective state for human health and the environment for unrestricted use; therefore, no further response action is necessary. This decision is based on the fact that CERCLA hazardous substances present at Polaris Point either

- do not exceed background concentrations for metals,
- are below EPA Region IX recommended cleanup levels, or
- are within acceptable risk levels.

Based upon the above conditions, the 5-year review requirement under CERCLA Section 121(c) is not applicable.

1.5 AUTHORIZING SIGNATURES

The U.S. Navy, with concurrence from GEPA, has determined that no further response action is necessary at Polaris Point for unrestricted use.

Melvin Z. Waki, P.E.
Head, Environmental Services Department
Pacific Division, Naval Facilities Engineering Command

9/17/02
Date

Jesus T. Salas, Administrator
Guam Environmental Protection Agency

9-12-02
Date

2. DECISION SUMMARY

2.1 SITE NAME, LOCATION, AND DESCRIPTION

The Polaris Point site consists of 79.3 acres and is located at the intersection of Marine Drive (Route 1) and Polaris Point Road, northeast of Inner Apra Harbor in western Guam in the municipality of Piti. The site is bordered by outer Apra Harbor on the north, Marine Drive on the east, undeveloped property on the south, and Polaris Point Naval Station on the west. Polaris Point Road bisects the Polaris Point parcel into northern and southern sections. Across the northern side of the Polaris Point Road stands an undeveloped mangrove forest (see Figure 2-1).

The Navy is the lead agency for environmental cleanup at Navy sites, such as Polaris Point. GEPA and EPA have provided oversight during environmental investigations and clean up activities on Navy BRAC properties.

2.2 SITE HISTORY AND ENFORCEMENT ACTIVITIES

In 1980, a Guam Oil Refinery Company pipeline that is parallel to Marine Drive spilled diesel fuel, which migrated to the mangrove forest on the northern side of the Polaris Point parcel. The Guam Oil Refinery Company has cleaned up the impacted area to GEPA requirements and replanted 4 acres of mangroves.

An Environmental Baseline Survey (EBS) (Ogden 1996) and an addendum to the EBS (Ogden 1998) identified past and current land use and areas of environmental concern, and discussed relevant land use conditions, including the Old Navy Supply Depot (NSD), Drum Storage Lot, SWMU #49, and the neighboring oil pipelines. SWMU #49 is a former petroleum product handling facility used for fuel storage, drum filling, and drum cleaning operations, and was identified as an area of concern.

A Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) was conducted at the SWMU #49 to determine if past use of the site and adjacent properties had impacted site soil or groundwater. The RFI was completed in 1997 and the results were presented in the *RCRA Facility Investigation Report, DRMO Salvage and Scrap Yard (Solid Waste Management Unit [SWMU] #12) and Old NSD Drum Storage Lot (SWMU #49), Apra Harbor Naval Complex, Guam, Mariana Islands* (Ogden 1997).

To facilitate reuse of the property after early transfer, a determination letter was reviewed by the BCT, and approved by GEPA, EPA, and the Navy (Earth Tech 2001). This letter permits the Government of Guam to use the property for industrial purposes while the environmental closure process continues and while the ROD is being reviewed and finalized. Following the determination letter, the BCT further evaluated information about the site, specifically the risk evaluation section of the RFI report. This evaluation focused on a detailed review of concentrations of chemicals of concern (COC), their location and frequency of detection, and a detailed comparison to 1999 EPA Region IX preliminary remediation goals (PRGs). These PRGs are risk-based tools for evaluation of contaminated sites. The BCT concluded that the Polaris Point site is already in a protective state for human health and the environment and is suitable for unrestricted use (BCT 2001).

2.3 COMMUNITY PARTICIPATION

In an effort to involve the public in the decision-making process for BRAC activities at Polaris Point, a Restoration Advisory Board (RAB), composed of the BCT and community representatives, was established. The Navy also established a point of contact for the public at PACNAVFACENGCOM.

A notice of availability for the Proposed Plan was published in the *Pacific Daily News* on 4 and 15 August 2001. A public comment period was held from 16 August to 15 September 2001. In addition, a public meeting was conducted on 16 August 2001 to present the Proposed Plan. At this meeting, the Navy answered questions about the site and the no further response action alternative. The Navy's response to comments received is included in the Responsiveness Summary, which is part of this ROD.

Other project documents, including work plans, technical reports, fact sheets, and other materials relating to the Polaris Point investigation activities, can be found in the information repository for Polaris Point (Administrative Record for Polaris Point) at the following address:

Nieves M. Flores Memorial Library
254 Martyr Street
Hagatna, Guam 96910

2.4 Scope and Role of Response Action

Based upon the results of soil and groundwater investigations at Polaris Point, as documented in the 1997 RFI report (Ogden 1997) and the 2001 Proposed Plan (Earthtech 2001), the BCT concluded that the site does not pose a risk to human health or the environment, and no further response action is necessary at this site for unrestricted use.

2.5 Site Characteristics

SWMU #49 is substantially paved with asphalt, occupies 40 acres within the Polaris Point site and was the area of concern focused on in the RFI. Surface soil data were not collected as part of the RFI partially due to the asphalt covering and the unlikely occurrence that volatile organic compounds (VOCs) would remain in surface soil in uncovered areas. Nine soil borings were advanced and monitoring wells installed during the RFI from 12 to 19 February 1996. Subsurface soil and groundwater were sampled to determine whether any impact has occurred from previous drum cleaning operations and fuel storage and distribution (Ogden 1997).

Soil. Subsurface soil samples were analyzed for VOCs, polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPH), and metals. Analyses of subsurface soil samples revealed the PAHs benzo(a)pyrene and indeno(1,2,3-cd)pyrene and TPH and as the principal COCs.

- PAH constituents were found in three subsurface soil samples at levels that slightly exceed EPA Region IX PRGs for soil under a residential scenario.
- TPH was detected in two subsurface soil samples at concentrations that exceed GEPA underground storage tank (UST) guidance for soil cleanup levels. The GEPA UST cleanup level was used as screening criteria for TPH, because no PRG has been established for TPH in soil.

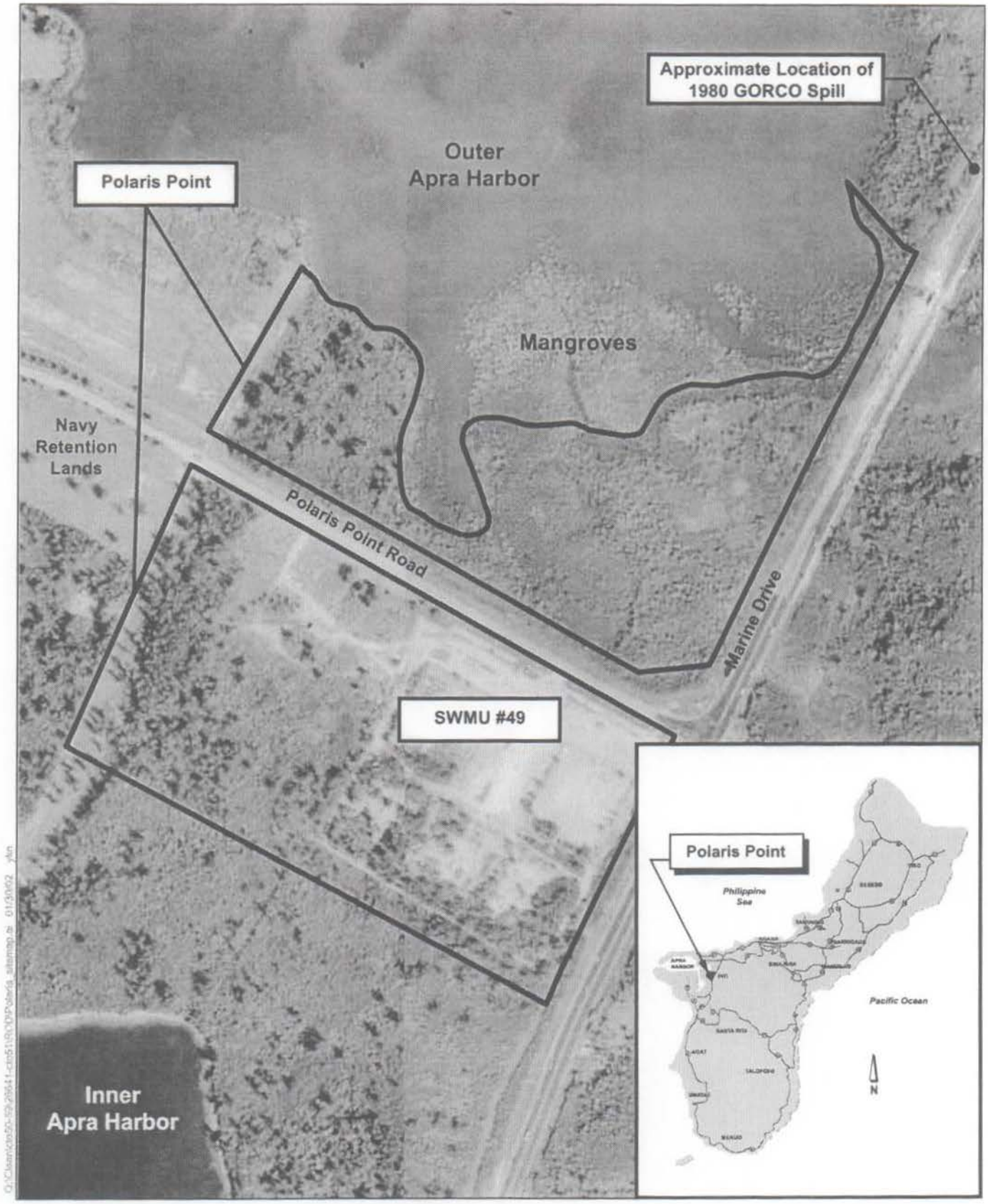

Figure 2-1
Site Location Map
Polaris Point BRAC Parcel
COMNAVMARIANAS, Guam

Groundwater. Groundwater at Polaris Point has been determined to be unsuitable for drinking due to its brackish nature. However, as a conservative measure, groundwater was sampled and tested for VOCs, PAHs, PCBs, TPH, and metals. Analytical results were screened against the Guam Water Quality Standards (GWQS) and the National Ambient Water Quality Criteria (NAWQC). None of the results exceeded either screening criteria.

Risk Evaluation. A risk-based evaluation was completed as part of the RFI. The first step of the risk-based evaluation was to develop a conceptual site model (CSM) (referred to as a conceptual evaluation model in RFI report). Taking into account current and proposed land uses, the CSM was designed to evaluate site contaminant exposure pathways to site receptors. Potentially complete pathways were identified as those pathways that have a contaminant source, a transport mechanism, a point at which contact with a contaminant may occur, and a toxicological exposure route (i.e., oral, dermal, or inhalation). The CSM completed for SWMU #49 identified no complete exposure pathways for current, on- or off-site workers or current off-site recreational scenarios. Because future industrial use of the site may involve exposure to subsurface soil, a preliminary human health risk assessment was conducted.

2.6 CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES

Current Use. As of 11 April 2001, the Polaris Point parcel has been transferred to the Government of Guam under the BRAC program. Polaris Point is currently not in use, and has not been actively used by the Navy since the 1970s.

Future Use. The Guam Land Use Plan (GLUP) has identified the property for future industrial use (GEDA 1996); however, unrestricted use was also evaluated. For this parcel the BCT determined that the site was suitable for unrestricted use (BCT 2001).

2.7 SUMMARY OF SITE RISKS

Site risks were evaluated by two separate methods to determine risks associated with the site: a risk-based evaluation for human health and a screening ecological risk assessment (SERA) for ecological effects.

Human Health Evaluation. A human health risk-based evaluation was conducted for COCs detected in subsurface soil at Polaris Point in accordance with the EPA *Risk Assessment Guidance for Superfund (RAGS)* (EPA 1989) and the *Supplemental Guidance to RAGS: Calculating the Concentration Term* (EPA 1992). To evaluate risk from exposure to COCs under the risk-based evaluation, the reasonable maximum exposure (RME) was compared to EPA Region IX (1996) residential PRGs. The RME is the highest level of human exposure that could reasonably be expected to occur from the chemicals detected on site. The PRGs represent the concentration below which no significant health effects are likely to occur.

Using the RME, the excess and cumulative cancer risks were calculated for carcinogens. These risks are probabilities that are typically expressed in scientific notation (e.g., 1E–06). An excess lifetime cancer risk of 1E–06 indicates that an individual experiencing the RME estimate has a 1 in 1,000,000 chance of developing cancer as a result of site-related exposure. This is referred to as an "excess lifetime cancer risk" because it would be in addition to the risks of cancer individuals face from other causes, such as smoking or overexposure to the sun. The cumulative cancer risk is the sum of all excess cancer risks.

The EPA has established a "point of departure" of 1E–06 for excess cancer risk. Cumulative cancer risk greater than the point of departure, but less than 1E–04 (i.e., the "risk range") warrants further evaluation or a response action, which may include land use controls.

The hazard index (HI) evaluates noncarcinogenic effects. The HI is the cumulative total of hazard quotients (HQ). An HQ is the ratio of exposure to toxicity for a given chemical. An HI less than 1 indicates that, based on the sum of all HQs from different contaminants and exposure routes, toxic noncarcinogenic effects from all contaminants are unlikely. An HI greater than 1 indicates that site-related exposures may present a risk to human health.

The results of those evaluations for SWMU #49 are summarized below:

- The subsurface soil RME cumulative cancer risk of 2.0E–06 is within the risk range of 1.0E–06 and 1.0E–04.
- The hazard index is less than 1 for subsurface soil.
- No groundwater results exceeded the GWQS or the NAWQC.

No unacceptable risks to human health were identified. The BCT reviewed the risk-based evaluation results in detail. Following this review, the BCT concluded that the site is suitable for unrestricted use (BCT 2001).

Slightly elevated TPH levels in soil have also been addressed by the BCT. The BCT concluded that the levels of TPH found in the soil do not pose an unacceptable risk to human health or the environment for unrestricted use (BCT 2001). A variance letter from GEPA concerning the TPH exceedances at Polaris Point has been provided to the Navy and can be found in Appendix A.

Screening Ecological Risk Assessment. The SERA was based on the *Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments* (EPA 1997). The SERA evaluated the potential for significant adverse ecological effects from receptor exposure to chemicals of potential ecological concern (COPECs) detected in soil and groundwater at the site.

This assessment involves three steps: (1) site characterization or identification of COPECs, (2) biological characterization, an evaluation of the ecological habitat, and (3) pathway assessment and risk characterization. The ecological community is at risk only if there exists a complete pathway to COPECs.

Hazard quotients (HQ) and hazard indices (HI) were compared to the threshold value of 1 to asses potential ecological risk to site receptors. HQ values are used as one indicator (but not a direct measure) of potential risk from a COPEC. Generally, an HQ value greater than 1 suggests a potential for risk to a receptor. Chemical concentrations detected in the soil and groundwater samples collected during the RFI were used to calculate risk to both terrestrial and aquatic receptors. The SERA indicated that the HQs for SMWU #49 do not exceed 1; therefore, the site does not pose an unacceptable risk to ecological receptors (Ogden 1999).

2.8 Documentation of Significant Changes

No significant changes to the proposed plan were required.

3. RESPONSIVENESS SUMMARY

The public comment period for the proposed plan was held between 16 August and 15 September 2001. No written public comments were received during this period; however, verbal comments were received during the public meeting for the proposed plan held on 15 August 2001. Responses to these comments are provided in Appendix B.

3.1 COMMUNITY PREFERENCES

No community preferences were requested or identified.

3.2 INTEGRATION OF COMMENTS

Comments received are addressed in Appendix B.

3.3 EPA REGION IX AGREEMENT WITH SELECTED REMEDY

The EPA agrees with the proposed no further response action (see Appendix C).

4. REFERENCES

Base Realignment and Closure (BRAC) Cleanup Team (BCT). 2001. *May 2001 BCT Meeting Minutes, BRAC IV Parcels, Guam.* 10–11 May.

Earth Tech, Inc. 2001. *Proposed Plan, Old Navy Supply Depot, Drum Storage Lot, Polaris Point, Piti, Guam.* Pearl Harbor, Hawaii: PACNAVFACENGCOM. August.

Environmental Protection Agency, United States (EPA). 1989. *Risk Assessment Guidance for Superfund (RAGS): Vol. 1- Human Health Evaluation Manual, Part A.* December.

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Environmental Protection Agency, United States, Region IX (EPA Region IX). 1996. *Region IX Preliminary Remediation Goal (PRG) Table.* San Francisco.

Guam Economic Development Authority (GEDA). 1996. *Reuse Plan for Guam Land Use Plan (GLUP) '94 Navy Properties.* October.

Guam Environmental Protection Agency. 2001. Variance Letter.

Ogden Environmental and Energy Services Co. (Ogden). 1996. *Environmental Baseline Survey (EBS) for Naval Activities, Various Sites, Guam, Mariana Islands (Final).* Pearl Harbor, Hawaii: PACNAVFACENGCOM. November.

———. 1997. *RCRA Facility Investigation Report, DRMO Salvage and Scrap Yard (SWMU #12) and Old NSD Drum Storage Lot (SWMU #49), Apra Harbor Naval Complex, Guam, Mariana Islands.* Pearl Harbor, Hawaii: PACNAVFACENGCOM. July.

———. 1998. *Environmental Baseline Survey Addendum Report for Public Works Center, Various Sites, Mariana Islands, Guam (Final).* Honolulu: PACNAVFACENGCOM. June.

———. 1999. *Screening Ecological Risk Assessment (SERA) for the Old Navy Supply Depot (NSD) Drum Storage Lot Site (SWMU #49), Apra Harbor Naval Complex, Guam, Mariana Islands.* Honolulu: PACNAVFACENGCOM. April.

Appendix A
Variance Letter Correspondence with GEPA

GUAM ENVIRONMENTAL PROTECTION AGENCY

AHENSIAN PRUTEKSION LINA'LA GUAHAN

P.O. BOX 22439 GMF • BARRIGADA, GUAM 96921 • TEL: 475-1658/9 • FAX: 477-9402

Melvin Waki
Department of the Navy
Pacific Division, Naval Facilities Engineering Command
258 Makalapa Drive, Suite 100
Pearl Harbor, Hawaii 96860-3134

Dear Mr. Waki,

This letter is in response to the U.S. Navy's variance request for Total Petroleum Hydrocarbons (TPH) at the BRAC parcel, Old Navy Supply Depot, Drum Storage Lot, Polaris Point, Piti, Guam. The Guam Environmental Protection Agency (GEPA) concurs with the US Navy. The BRAC process, which follows CERCLA guidelines, allows for TPH on site. This is not a hazardous waste and does not pose danger to human health or the environment. Please be advised that this TPH variance request is site specific to this BRAC parcel.

If you have any questions please contact me at (671) 475-1658 or Mr. Walter S. Leon Guerrero (671) 475-1644.

Sincerely,

JESUS T. SALAS
Administrator

DEPARTMENT OF THE NAVY
PACIFIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
258 MAKALAPA DR., STE. 100
PEARL HARBOR, HI 96860-3134

5090.NN
Ser ENV1824/1521

28 JUN 2002

Mr. Jesus Salas
Administrator
Guam Environmental Protection Agency
P.O. Box 22439, GMF
Barrigada, GU 96921

Dear Mr. Salas:

Subj: TOTAL PETROLEUM HYDROCARBON (TPH) CONCENTRATIONS, POLARIS POINT (PARCEL N14), SOLID WASTE MANAGEMENT UNIT (SWMU) #49, OLD NSD DRUM STORAGE LOT

The Navy conducted a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) at SWMU #49 in 1997 to characterize the nature and extent of environmental contamination resulting from past use of the property, and to evaluate the potential risk to human health and the environment. Subsurface soil samples were collected to evaluate the potential for contaminant releases associated with drum cleaning operations and the fuel storage and distribution activities. Samples were collected to assess groundwater flow and to determine whether groundwater had been impacted as a result of possible contaminant releases.

The results of soil and groundwater samples were compared to the appropriate U.S. Environmental Protection Agency (EPA) residential preliminary remediation goals (PRGs). Sample data were further evaluated under a risk evaluation, which concluded there is no unacceptable risk to human health or the environment at SWMU #49.

Because EPA has not set PRGs for TPH, concentrations detected in soil samples were compared with the GEPA Underground Storage Tank (UST) cleanup guideline of 50 mg/kg. TPH concentrations in two subsurface soil samples exceed the guideline (see Table 1).

Table 1: TPH Concentrations in Subsurface Soil that Exceed GEPA 50 mg/kg Cleanup Goal

Sampling Location	Sample ID No.	Date	Depth (feet)	TPH Concentration (mg/kg)*
SB03	FOSB03S2D7.5	02/12/96	7.5	1,200 Y1
SB05	FOSB05S2D7.5	02/14/96	7.5	2,300 Y1

*TPH as diesel
Y1 = Reported concentration is due to a combination of diesel fuel and other hydrocarbon contaminants

The two subsurface soil samples are at a depth of 7.5 feet, where human exposure is not likely. In addition, polynuclear aromatic hydrocarbon (PAHs), which are constituents of TPH, were included in the risk assessment and were found to be acceptable. The risk calculation for benzo(a)pyrene was shown to be at the point of departure of 1E-06. The remaining PAH risk

calculations were all below the point of departure. Other Navy sites on Guam have been granted a variance from the UST cleanup guideline on a case-by-case basis after thorough review of the site data by GEPA. This approach of determining site-specific risk using the concentration of the contaminate constituents that contribute to risk has been adopted by most States. Based on these findings presented herein, the Navy respectfully requests a variance letter from GEPA exempting SWMU #49 from the GEPA TPH cleanup level of 50 mg/kg and concurring with the no action necessary decision with respect to TPH in soil at SWMU #49.

The Navy also requests GEPA revisit the policy for variance requests. The current policy requires a variance request letter for each site that exceeds the GEPA UST cleanup guidelines. However, inclusion of site-specific risk evaluations in each project report document (e.g. Remedial Investigation report, RCRA Facility Investigation report, UST report) alleviates the need for a separate variance request letter. Concurrence review by GEPA may be performed at the time each document is submitted to GEPA. If GEPA agrees, then the Navy would no longer be required to request a variance for sites where GEPA has concurred with the site-specific risk evaluation. The adoption of this new policy to reduce the redundant requirement for a separate variance request where GEPA has concurred with the findings of the report would save valuable time and resources of both GEPA and the Navy.

Should you have any questions, please contact Mr. Eric Shigaki of our Environmental Restoration Division at (808) 472-1450.

Sincerely,

Melvin Z. Waki

MELVIN Z. WAKI, P.E.
Head
Environmental Engineering Department

Appendix B
Response to Comments

Project Title: Proposed Plan Old Naval Supply Depot Drum Storage Lot
Polaris Point, Piti, Guam
Reviewer: Public
15 August 2001

Comment No.	Speaker	Comment
1	Mr. Lance Richman	On these non-NPL sites, does Guam EPA send you folks a concurrence letter, or do we actually sign the Record of decision (ROD)?
Response (Speaker): Guam EPA Signs the ROD and the U.S. EPA sends a concurrence letter (Mr. John Fern)		
2	Mr. Lance Richman	Is the Navy the lead agency?
Response (Speaker): Yes (Mr. John Fern).		
3	Mr. Lance Richman	Who signs the ROD for the Navy?
Response (Speaker): The BRAC Director and the Environmental Engineering Department Head co-signs the ROD (Mr. Eric Shigaki).		
4	Mr. Lance Richman	Would the Guam EPA administrator sign on behalf of Guam EPA?
Response (Speaker): Yes (Mr. John Fern).		
5	Miss Grace Garces	What is a variance letter? Would it be Guam EPA and not USEPA that would handle this federal action?
Response (Speaker): The variance letter relates to the level of total petroleum hydrocarbon that was found on Polaris Point. The Guam EPA currently has underground storage tank guidelines that set a level of fifty parts per million of Total Petroleum Hydrocarbons (TPH) in the soils. The USEPA would not be involved since it is a Guam EPA guideline. At Polaris Point we found that there were a couple of TPH excedances. The Navy requested a variance based on negligible risk and Guam EPA concurred with the Navy. The variance letter documents a variance from the Guam EPA TPH guideline (Mr. Lance Richman).		
6	Mr. Michael Wolfram	Will the public also be notified through Pacific Daily News?
Response (Speaker): Yes. Public notices of availability were placed in the Pacific Daily News for Marine Drive 2 and Polaris Point Proposed Plans on Sunday, August 12, 2001 and Wednesday, August 4, 2001. It also notified the public that the Navy was holding a Restoration Advisory Board (RAB) meeting tonight on the two proposed plans. In addition, it had a point of contact, which is myself, to request the proposed plans, or any other information in the administrative record (Mr. Eric Shigaki).		
7	Mr. Michael Wolfram	Will there be other reminders, like on a weekly basis, since it looks like we're not having very good turnout? Have you considered reminders that say, "there are proposed plans available for review, and there is a comment period that has three weeks remaining."
Response (Speaker): Right now, we have no plans to do that and I would certainly consider it. The ads costs about fifteen hundred per ad and the Navy has advertised twice (Mr. Eric Shigaki).		

Project Title: Proposed Plan Old Naval Supply Depot Drum Storage Lot
Polaris Point, Piti, Guam
Reviewer: Public
15 August 2001

Comment No.	Speaker	Comment
8	Mr. Michael Wolfram	You know, I didn't realize it was that expensive. I actually haven't heard of that being done before. But I just thought because it's really difficult to get some attendance for the RABs. I was just trying to think of how to get the public more involved.
Response (Speaker): One option might be to send e-mails to the RAB members (Mr. John Fern). Postcards are another option (Mr. Jeff Lefebvre). In addition to the public, the Navy also sends these proposed plans to interested agencies, and that would include agencies like the U.S. Fish and Wildlife, Guam Public Works, Guam Economic Development Agency (GEDA). The Navy sends these agencies a letter requesting comments and reminding them that they have thirty days to send the Navy their comments (Mr. Eric Shigaki). News releases are another option and it's free (Miss Grace Garces). The Navy will be presenting more proposed plans in the future. I will coordinate with Miss Garces when we do our next RAB meeting to utilize the news release option (Mr. Shigaki).		
9	Mr. Randel Sablan	What determined the southwest boundary of the site?
Response (Speaker): Mr. Fern utilized a figure from the presentation to show Mr. Sablan the Polaris Point Parcel's legal boundaries.		
10	Miss Grace Garces	So this property is going to be transferred?
Response (Speaker): It was already transferred in April 2001.(Mr. Eric Shigaki)		
11	Mr. Bill Burke	What are they going to use it for?
Response (Speaker): A flea market (Miss Grace Garces).		
12	Mr. Randel Sablan	I was thinking at some point, it seems that this may have been a wetland. I was wondering how much was fill.
Response (Speaker): I've seen historical photos of the coastlines and Polaris Point did not exist. It was a wetland area that was filled. I don't know how far back they actually filled it (Mr. Eric Shigaki).		

Appendix C
Letter from EPA Region IX:
Agreement with Selected Remedy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
August 13, 2002

Leighton Wong
Pacific Division
NavFacEngCom
Pearl Harbor, HI 96860

RE: Record of Decisions for Old Navy Supply Depot, Drum Storage Lot, Polaris Point, Piti, Guam; and Marine Drive 2, Former Power Plant, Dededo, Guam dated August 2002.

Dear Mr. Wong:

The U.S. Environmental Protection Agency, Region IX (EPA) has reviewed the Record of Decisions for the Old Navy Supply Depot, Drum Storage Lot, Polaris Point, Piti, Guam, and Marine Drive 2, Former Power Plant, Dededo, Guam dated August 2002. The selected remedy for both of these sites is no further response action. Hazardous substances are not present at either the Old Navy Supply Depot or Marine Drive 2 at concentrations above acceptable risk levels. Therefore, these properties are already in a protective state for human health and the environment for unrestricted use and no further response action is necessary.

The Department of the Navy has worked in cooperation with the Guam Environmental Protection Agency (Guam EPA) regarding remedy selection for these sites. EPA is in agreement with the remedy selected in this ROD.

We wish to thank the Navy for the opportunity to be involved in the work at the Old Navy Supply Depot, and Marine Drive 2. We look forward to working with the Navy and Guam EPA in the future.

Sincerely,

Richard Seraydarian
Chief, DoD and Pacific Islands Section

cc: Eric Shigaki, Navy
Walter Leon Guerrero, Guam EPA
Robert Carr, USEPA
Michael Wolfram, USEPA