

**Record of Decision, Harmon
Annex Printing Shop Leach Field
FORMER NAVACTS
GUAM**

February 2004

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



**Comprehensive Long-Term Environmental Action Navy
Contract Number N62742-94-D-0048, CTO 0051**

**Record of Decision, Harmon
Annex Printing Shop Leach Field
FORMER NAVACTS
GUAM**

February 2004

Prepared for:



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

Prepared by:

**Earth Tech, Inc.
841 Bishop Street, Suite 500
Honolulu, HI 96813-3920**

Prepared under:

**Comprehensive Long-Term Environmental Action Navy
Contract Number N62742-94-D-0048, CTO 0051**

CONTENTS

ACRONYMS AND ABBREVIATIONS	v
1. DECLARATION	1-1
1.1 Site Name and Location	1-1
1.2 Statement of Basis and Purpose	1-1
1.3 Description of the Selected Remedy	1-1
1.4 Statutory Determinations	1-1
1.5 Signature and Support Agency Acceptance of Remedy	1-2
2. DECISION SUMMARY	2-1
2.1 Site Name, Location, and Description	2-1
2.2 Site History and Enforcement Activities	2-1
2.3 Community Participation	2-2
2.4 Scope and Role of the No Further Response Action Decision	2-5
2.5 Site Characterization	2-5
2.6 Current and Potential Future Site and Resource Use	2-5
2.7 Summary of Site Risks	2-5
2.8 Response Actions	2-6
2.9 Documentation of Significant Changes	2-6
3. RESPONSIVENESS SUMMARY	3-1
3.1 Community Preferences	3-1
3.2 Integration of Comments	3-1
3.3 EPA Region IX Agreement with Selected Remedy	3-1
4. REFERENCES	4-1
APPENDIXES	
A Agreement with Selected Remedy Letter from EPA Region IX	
B Responses to Comments on the Proposed Plan	
FIGURES	
2-1 Site Location Map	2-3

ACRONYMS AND ABBREVIATIONS

AM	action memorandum
BCT	BRAC Cleanup Team
bgs	below ground surface
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERFA	Community Environmental Response Facilitation Act
DON	Department of the Navy
EBS	environmental baseline survey
EPA	Environmental Protection Agency, United States
GEPA	Guam Environmental Protection Agency
NAVACTS	Naval Activities
NPPSO	Navy Publications and Printing Service Office
NAVFAC EFD PACIFIC	Pacific Division, Naval Facilities Engineering Command
PAH	polynuclear aromatic hydrocarbon
PCB	polychlorinated biphenyl
PRG	preliminary remediation goal
RAB	restoration advisory board
RSE	removal site evaluation
ROD	record of decision
RVR	remediation verification report
TSCA	Toxic Substances Control Act
U.S.	United States

1. DECLARATION

1.1 SITE NAME AND LOCATION

This record of decision (ROD) had been prepared for the Harmon Annex Printing Shop Leach Field, Former Naval Activities (NAVACTS), Guam.

1.2 STATEMENT OF BASIS AND PURPOSE

This ROD presents the no further response action decision for the Harmon Annex Printing Shop Leach Field. 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 the National Oil and Hazardous Substances Pollution Contingency Plan. Concurrence with this no further response action decision by the Guam Environmental Protection Agency (GEPA) is indicated by signature below. Concurrence with the decision by Region IX of the United States (U.S.) Environmental Protection Agency (EPA) is indicated in a letter contained in Appendix A of this ROD.

1.3 DESCRIPTION OF THE SELECTED REMEDY

Based on documents contained in the administrative record for the Harmon Annex Printing Shop Leach Field, the Base Realignment and Closure (BRAC) Cleanup Team (BCT), which consists of representatives from the GEPA, EPA, and the U.S. Navy (Navy), concluded that no further response action is necessary to protect human health or the environment. Results from confirmation samples collected after completion of a removal action in November 2000 indicated that the site is safe for future unrestricted use (IT 2000).

1.4 STATUTORY DETERMINATIONS

The Navy has determined that the CERCLA removal action, in which a septic system and impacted soil were removed, has addressed the previously identified threats to human health and the environment. Therefore, no further response action is necessary for the site. This decision is based on the fact that any remaining CERCLA hazardous substances present at Harmon Annex either:

- do not exceed background concentrations for metals or
- are below EPA Region IX risk-based cleanup levels for unrestricted use.

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

1.5 SIGNATURE AND SUPPORT AGENCY ACCEPTANCE OF REMEDY

The Navy and GEPA have determined that no further response action is necessary at the Harmon Annex Printing Shop Leach Field for unrestricted use.

Melvin Z. Waki

1/27/04

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

Date

Fred M. Castro

1/21/04

Fred M. Castro
Administrator
Guam Environmental Protection Agency

Date

2. DECISION SUMMARY

2.1 SITE NAME, LOCATION, AND DESCRIPTION

The Harmon Annex Printing Shop Leach Field is located in the northwestern portion of Guam, approximately 2 miles northeast of Tumon Bay in the municipality of Dededo (see Figure 2-1). The site is located on a 2.2-acre portion of Harmon Annex, an annex of Andersen Air Force Base (see Figure 2-1). The Navy formerly owned the 3.7-acre fenced area around the former Printing Shop (Building 50) and the adjoining 2.2-acre leach field; the Air Force owns the 1.1-acre access road to the site. This parcel was included in a land transfer to the Government of Guam, which was completed on 11 April 2001.

The Navy is the lead agency for environmental cleanup at Navy sites, such as the Harmon Annex Printing Shop Leach Field. GEPA and EPA Region IX have provided oversight during CERCLA investigations and cleanup activities on Navy BRAC properties.

2.2 SITE HISTORY AND ENFORCEMENT ACTIVITIES

Harmon Annex, shown in Figure 2-1, was originally used to receive radio transmissions during World War II. Little is known of the history of the facility until 1 February 1978, when the Air Force granted a permit to locate the U.S. Navy Publications and Printing Services Office (NPPSO) at Building 50. NPPSO operated a printing shop inside Building 50 until 31 March 1984 when it was relocated. From that time until the time of property transfer, the building was inactive except for periodic military drills, including target shooting inside the building—as evidenced by range targets and hay bales in several rooms (Earth Tech 1999).

Building 50 sanitary and printing shop wastewaters flowed through a transmission pipeline to a septic system consisting of a 3,200-gallon septic tank and 5,500-square-foot leach field. The leach field included a flow distribution box and nine leach lines southeast of Building 50, just outside the building's security fence.

In 1995, the Navy conducted an environmental baseline survey (EBS) of Harmon Annex (Ogden 1998), which was one of several former Guam NAVACTS sites to be transferred in accordance with the Guam Land Use Plan (DON 1995). The EBS was performed in compliance with the Community Environmental Response Facilitation Act (CERFA) of 1992, which amends the CERCLA of 1980. The purpose of the EBS was to identify and categorize the specific CERCLA hazardous substances or petroleum concerns based on review of available historical site information and site visits. At Harmon Annex, Building 50 and the associated septic system were identified as areas of concern. As a result, the area containing Building 50 and the septic system was categorized as Environmental Condition of Property Category 7—an area that is unevaluated or requires additional evaluation (Ogden 1998). In 1997, after the EBS was conducted, two transformers containing polychlorinated biphenyls (PCBs), located south of Building 50, were vandalized. Approximately 20 gallons of transformer fluid were released from each transformer and required a separate investigation and spill response action for contaminated soils near the transformers. In addition, the Navy completed abatement of asbestos in Building 50 (IT 2000a and 2000b). The PCB spill response action and the asbestos abatement were conducted to address potential health concerns. These non-CERCLA response actions are documented in the Findings of Suitability for Early Transfer (FOSET) document prepared in accordance with CERFA (Earth Tech 2000c).

Several CERCLA response actions related to the Printing Shop Leach Field have been completed at the site, including the following:

- Removal Site Evaluation (RSE), conducted in 1998, characterizing the nature and extent of contamination (Earth Tech 1999)
- Action Memorandum (AM), prepared in 2000, documenting potential threat for human health and the need for a removal action (Earth Tech 2000a)
- CERCLA Removal Action, completed on 14 November 2000
- Remediation Verification Report (RVR), prepared in 2000, documenting the removal action and confirmatory soil sampling results (IT 2000c)

These CERCLA actions at the Harmon Annex Printing Shop Leach Field are further described in Section 2.4, *Site Characterization*, and Section 2.8, *Response Actions*.

After these actions were conducted at Building 50 and the Harmon Annex Printing Shop Leach Field, the Navy completed a Finding of Suitability for Early Transfer for the parcel (Earth Tech 2000c) and transferred the land to the Government of Guam on 11 April 2001.

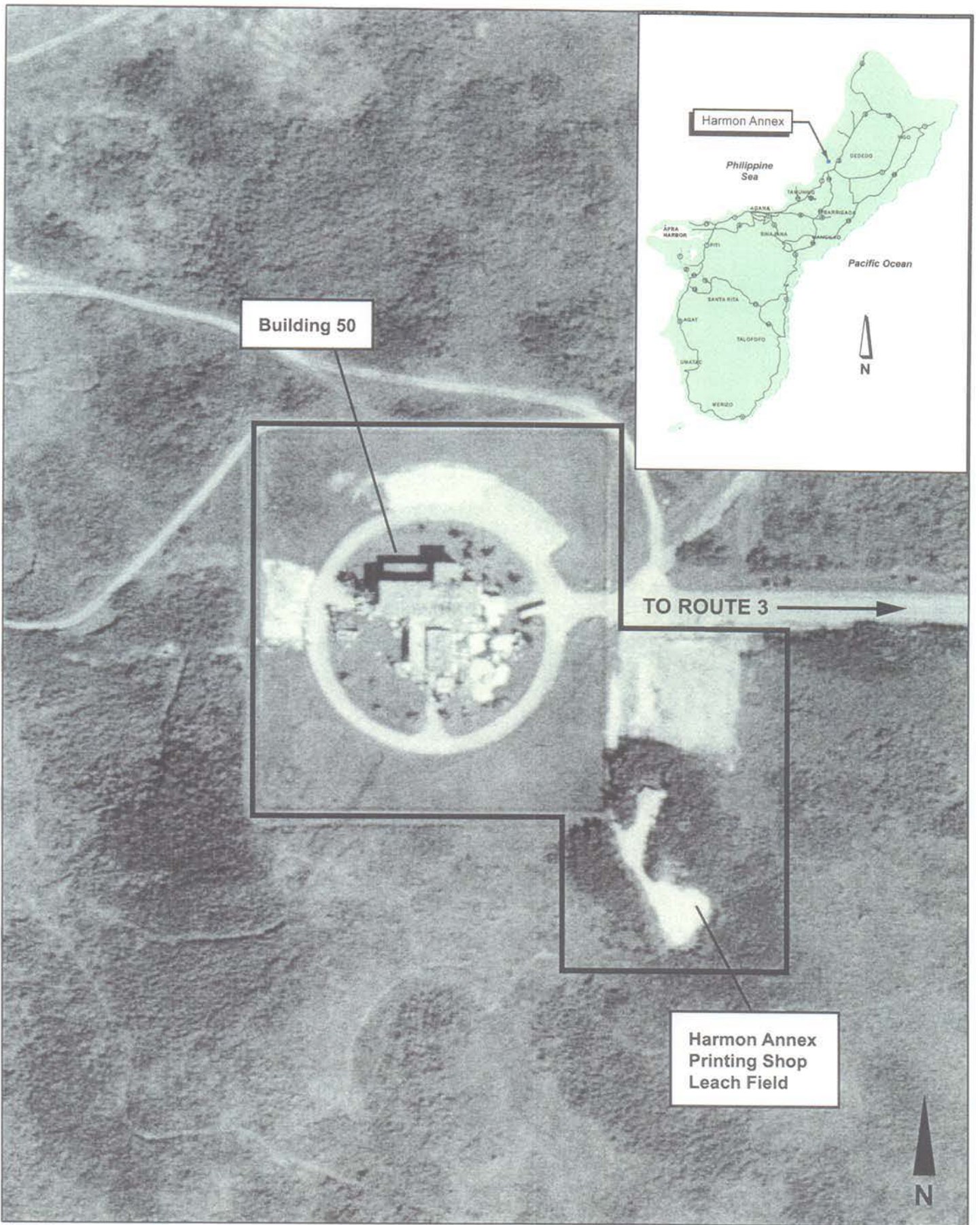
2.3 COMMUNITY PARTICIPATION

Community participation in the decision process for environmental activities at Harmon Annex has continually been encouraged throughout the environmental restoration and site closure processes. In an effort to involve the public in the decision-making process for BRAC activities at Harmon Annex Printing Shop Leach Field, a Restoration Advisory Board (RAB), composed of the BCT and community representatives, was established. The Navy has also held public meetings (17 November 1998, 18 February 1999, and 25 May 2000), and issued a fact sheet (PACNAVFACENGCOM Fact Sheet #8, May 2000) discussing the Harmon Annex site. Additionally the Navy established a point of contact for the public at the Pacific Division Naval Facilities Engineering Command (NAVFAC EFD PACIFIC).

A notice of availability for the Proposed Plan was published in the *Pacific Daily News* on 23 and 26 March 2003. A public comment period was held from 27 March to 26 April 2003. In addition, a public meeting was conducted on 27 March 2003 to present the Proposed Plan. At this meeting, the Navy answered questions about the site and the no further response action recommendation. The Navy's response to verbal comments raised at the public meeting is included in Section 3, *Responsiveness Summary*, and Appendix B of this ROD. No written comments were received during the comment period.

Other project documents, including work plans, technical reports, fact sheets, and other materials relating to the Harmon Annex Printing Shop Leach Field BRAC activities, can be found in the information repository for Harmon Annex (administrative record for Harmon Annex) at the following address:

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



Q:\Cleanico S1\Proposed Plan\Harmon Annex_PP\harmon_site_location.ai 05/29/03 rks

Figure 2-1
 Site Location Map
 Harmon Annex Printing Shop
 Leach Field, Guam

2.4 SCOPE AND ROLE OF THE NO FURTHER RESPONSE ACTION DECISION

Under CERCLA, no further response action is appropriate for sites where no current or potential unacceptable risk to human health or the environment exists. The CERCLA removal action has successfully lowered risks to human health and to the environment and has restored site to unrestricted use levels. This indicates that the site no longer poses unacceptable risks to human health or the environment; therefore, no further response action is necessary at this site for unrestricted use.

2.5 SITE CHARACTERIZATION

A RSE was conducted at the site 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 (Earth Tech 1999). The RSE, completed in November 1998, involved geophysical surveys and collecting soil and sludge samples from the leach field and septic system.

The area affected by discharges from the Printing Shop was delineated during the RSE (Earth Tech 1999). Analyses of samples of septic system wastes and leach field soils revealed polynuclear aromatic hydrocarbons (PAHs) as the principal chemicals of concern. Sludge and wastes in the septic system contained the highest concentrations of PAHs exceeding cleanup criteria. Leach field soils contained lower concentrations of PAHs with the exception of benzo(a)pyrene that was detected above acceptable levels in a localized stain area within fill material beneath the soil surface. PCBs were detected in low concentrations in the distribution box and leach field pipeline septic waste samples, but not in adjacent soil. Silver and zinc were also detected in septic wastes and subsurface soil samples at concentrations above background concentrations, but below EPA-recommended screening levels. The septic tank sludge was characterized as a hazardous waste, as defined by federal regulations, based on its reactive sulfide content. To address the identified contamination and hazardous wastes at the site, removal of soil and the septic wastes was selected as the cleanup alternative in the AM (Earth Tech 2000a).

2.6 CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USE

The Harmon Annex Printing Shop Leach Field was included in a parcel of land that was transferred to the Government of Guam on 11 April 2001. The Government of Guam intends to use the parcel for recreational purposes (GEDA 1996).

2.7 SUMMARY OF SITE RISKS

Prior to the removal action, a risk evaluation was conducted for the contamination detected in Harmon Annex Leach Field soils during the RSE (Earth Tech 1999). No environmental risks to plants or animals were identified. Since the site is to be developed for use as a community recreation area in the future, the evaluation found that potential risks to humans (e.g., construction workers and recreational users) could exist in the future if PAHs in subsurface soil are brought to the surface during planned development work.

Removal action objectives were identified and a removal action was selected in the AM to reduce potential risk to human health (Earth Tech 2000a). Removal of the septic wastes, systems, and contaminated soils was selected in the AM to reduce potential risk to future construction workers and recreational users. Confirmation samples collected after the impacted soil, septic wastes, and septic system material (i.e., tank and pipelines) were removed indicate that removal action was successful at reducing risk to human health to acceptable levels under unrestricted use scenarios (IT 2000c).

2.8 RESPONSE ACTIONS

A RSE report (Earth Tech 1999) and subsequent AM (Earth Tech 2000a) documented the unacceptable potential threat to human health, and the need for removal of the septic system and impacted soils. The RSE and AM also included discussion of removal action alternatives evaluated, the recommended removal action, and the removal action objectives and requirements.

The AM is the primary CERCLA removal action decision document. In the AM (Earth Tech 2000a), the removal action objectives for site soils were set conservatively at the EPA Region IX industrial soil preliminary remediation goals (PRGs) (EPA Region IX 1998). The members of the BCT approved the recommended removal action with these soil PRGs as appropriate cleanup criteria for the site under the planned future recreational land use.

In accordance with the AM and a Removal Action Work Plan (IT 1999), the CERCLA removal action at the Printing Shop Leach Field began on 10 January 2000 and was completed on 14 November 2000 (IT 2000c). Approximately 335 cubic yards of PAH-contaminated soil, 5,390 gallons of solidified septic sludge, the septic tank, and the transmission and leach field piping were excavated and disposed of at approved offsite disposal facilities. Following excavation, the Navy collected confirmation samples from soils remaining in the excavated areas to verify that all impacted soil above cleanup criteria was removed. Confirmation soil sample results indicate that remaining soils, after completion of the removal action and subsequent backfilling, do not pose unacceptable risks to human health or the environment; therefore, the site may be utilized for unrestricted use. The Navy prepared a RVR documenting the removal and disposal of septic system structures, wastes, and impacted soils, as well as confirmation soil sampling results (IT 2000c).

2.9 DOCUMENTATION OF SIGNIFICANT CHANGES

No significant changes to the proposed plan recommending no further action were required based on the public comments received on the Proposed Plan (see Appendix B for public comments received).

3. RESPONSIVENESS SUMMARY

The public comment period for the proposed plan was held between 27 March and 26 April 2003. No written comments were received during this period; however, verbal comments were received during a public meeting for the proposed plan held on 27 March 2003. Responses to these verbal comments are presented in Appendix B.

3.1 COMMUNITY PREFERENCES

No community preferences were identified or requested.

3.2 INTEGRATION OF COMMENTS

Responses to comments received on the proposed plan are integrated in Appendix B. No changes to the decision are indicated in these comments.

3.3 EPA REGION IX AGREEMENT WITH SELECTED REMEDY

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

4. REFERENCES

- Department of the Navy (DON). 1995. *GLUP 94—Guam Land Use Plan Update*. Prepared by PACNAVFACENGCOM, for Commander in Chief, Pacific Fleet (CINCPACFLT), and Commander Pacific Air Forces (PACAF). April.
- Earth Tech, Inc. (Earth Tech). 1999. *Removal Site Evaluation, Harmon Annex Printing Shop Leach Field, Former NAVACTS, Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. December.
- . 2000a. *Action Memorandum for a Time-Critical Removal Action at Harmon Annex Printing Shop Leach Field, Former NAVACTS, Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. February.
- . 2000b. *Architect/Engineer Inspection Report, Post-Construction Award Services, Time-critical Removal Action, Harmon Annex Printing Shop Leach Field, Area of Concern 1, Former Naval Activities, Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. September.
- . 2000c. *Finding of Suitability for Early Transfer, Harmon Annex (Parcel N3), Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. October.
- Environmental Protection Agency, United States, Region IX (EPA Region IX). 1998. *EPA Region IX Preliminary Remediation Goal (PRG) Tables*. May.
- Guam Economic Development Authority (GEDA). 1996. *Reuse Plan for Guam Land Use Plan (GLUP) '94 Navy Properties*. Government of Guam. October.
- IT Corporation (IT). 1999. *Removal Action Work Plan, Harmon Annex Printing Shop Leach Field, Former Naval Activities, Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. November.
- . 2000a. *Draft Asbestos and Lead-Based Paint Inventory Report, Various Locations, Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. August.
- . 2000b. *Draft Final Summary Report, Asbestos Abatement, Building 50, Harmon Annex, Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. July.
- . 2000c. *Remediation Verification Report, Harmon Annex Print Shop Leach Field, Area of Concern No. 1, Former Naval Activities, Guam*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. December.
- Ogden Environmental and Energy Services Co., Inc. (Ogden). 1998. *Environmental Baseline Survey for Naval Activities Various Sites, Volume 1, Guam, Marianas Islands*. Pearl Harbor, Hawaii: PACNAVFACENGCOM. July.

Appendix A
Agreement with Selected Remedy Letter
from EPA Region IX



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

October 31, 2003

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

RE: Record of Decision, Harmon Annex Printing Shop Leach Field, NAVACTS,
Guam.

Dear Mr. Wong:

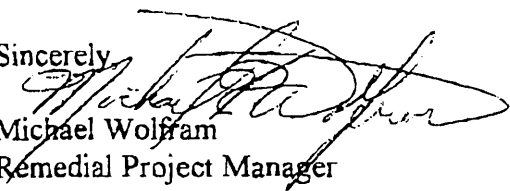
The U.S. Environmental Protection Agency, Region IX (EPA) has reviewed the Draft Record of Decision for the Harmon Annex Printing Shop Leach Field, Former NAVACTS, Guam, received by cover letter dated September 29, 2003. The selected remedy for this Record of Decision is no further response action.

The EPA is in agreement that the CERCLA removal action, in which a septic system and impacted soil were removed, has addressed the previously identified threats to human health and the environment and that hazardous substances are not present at the Harmon Annex Printing Shop Leach Field at concentrations above acceptable risk levels. Accordingly, EPA considers this property to be 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 EPA and the Guam Environmental Protection Agency regarding remedy selection for this Site. 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 Harmon Annex Printing Shop Leach Field Site and we look forward to continuing to work with the Navy and Guam EPA in the future.

Sincerely,


Michael Wolfram
Remedial Project Manager

cc: Eric Shigaki, Navy
Walter Leon Guerrero, Guam EPA
Robert Carr, USEPA
John Chesnutt, USEPA

**Appendix B
Responses to Comments
on the Proposed Plan**

Project Title: Proposed Plan Harmon Annex Printing Shop Leach Field
 Harmon Annex, Dededo, Guam
 Reviewer: Public at 3/27/03 Meeting

Comment No.	Speaker	Comment
1	Mr. Paul Packbier	Was there a need to over excavate or you just removed the soil that was surrounding the leach field piping?
Response (Speaker): The Navy excavated down to a little below every pipe because there was a little bit of staining at the joints beneath the pipes. So they ended up overexcavating in order to cleanup the soil to unrestricted use (Mr. Bill Burke).		
2	Mr. Jess Torres	Who were the signatories to the ROD?
Response (Speaker): The ROD has not yet been prepared for the site (Mr. John Fern). This site is still at the proposed plan stage (Mr. Eric Shigaki). After we receive comments from the public on the Proposed Plan, the Navy will prepare a Draft ROD for review and concurrence by the regulatory agencies. The Navy will prepare a Final ROD, which will be signed by the Navy and Guam EPA (Mr. Bill Burke). In addition to Guam EPA, the Navy will also receive a signed letter of concurrence from US EPA Region IX (Mr. Eric Shigaki).		
3	Mr. Jess Torres	Will there be a PACDIV representative or will it go to Washington?
Response (Speaker): PACDIV has the authority to sign the ROD on behalf of the US Navy (Mr. Eric Shigaki).		
4	Mr. Tony Artero	Is the site above the Guam water lens?
Response (Speaker): Yes, it is. The whole northern portion of Guam sits on top of the water lens (Mr. Bill Burke).		
5	Mr. Tony Artero	Is there a way of determining whether contamination has percolated down to the water lens?
Response (Speaker): The Navy did a visual and odor inspection to make sure all contaminated soil was removed. When the soil appeared clean, confirmation soil samples determined that the contamination had been removed. Since the remaining soils were clean, the assumption is that contamination did not migrate at depth to the water lens (Mr. Bill Burke).		
In addition, the Navy reviewed data from nearby Air Force wells and determined that contaminants detected in these wells did not include those found in site soils (Mr. John Fern).		
6	Mr. Tony Artero	What's the distance to the nearest well?
Response (Speaker): It's located along Route 3, less than a mile from the site (Mr. John Fern).		
7	Mr. Tony Artero	What year was the printing shop closed?
Response (Speaker): 1984 (Mr. Bill Burke).		
8	Mr. Toraj Ghofrani Mr. Warren Hall	Are the PAHs and PCBs detected in soils related to printing shop activities or the septic tank or other site activities? Do you know the source of the PAHs?
Response (Speaker): Reactive sulfides were removed from the septic tank itself and then the PAHs were removed from the pipes and surrounding leach field soils (Mr. Bill Burke). The soils and septic system also contained silver, which you would expect to find in printing shop wastes (Mr. John Fern). The PAHs probably originate from spent solvents and lubricants that were discharged through the sinks and drains to the septic system and leach field (Mr. John Fern and Mr. Bill Burke).		
The Navy sampled soils for contaminants that are typically found in print shop wastes. The list of contaminants came from USEPA (Mr. John Fern and Mr. Eric Shigaki). Printing shop wastes typically contain silver, and PAHs are typical contaminants found in municipal wastes (Mr. Toraj Ghofrani).		

Project Title: Proposed Plan Harmon Annex Printing Shop Leach Field
 Harmon Annex, Dededo, Guam
 Reviewer: Public at 3/27/03 Meeting

Comment No.	Speaker	Comment
9	Mr. Michael Gowel	How did the actual volume of soil removed from the site compare to the estimated soil volume?
Response (Speaker): The estimated soil volume was not available, but the actual volume is relatively small, so the difference between actual and estimated soil volume is probably pretty small (Mr. Eric Shigaki and Mr. Bill Burke).		
10	Miss Grace Garces	Is the record of decision a record of transfer to Gov Guam?
Response (Speaker): No, it's a record of decision documenting all the site investigation and cleanup activities that led to site closure. The record of transfer is called a FOSET, a Finding of Suitability for Early Transfer. In addition, the deed to the property contains some environmental language that was used to transfer the property to Gov Guam (Mr. Eric Shigaki).		
11	Miss Grace Garces	So what happens to the property now?
Response (Speaker): It proceeds through the CERCLA site closure process with a record of decision documenting the need for no further action. This document signifies the end of the CERCLA process for this site (Mr. Bill Burke).		
12	Miss Grace Garces	In 1996, EDB was found in well F2. Is there a possibility that contamination from the leach field might migrate and contaminate the groundwater many years in the future and Gov Guam would have to install a treatment system to clean it up?
Response (Speaker): This is a former Department of Defense site. When the Navy transfers the property, the Navy grants what we call a CERCLA covenant saying if you find any contamination caused by the US government, the US government is responsible for cleaning it up (Mr. Eric Shigaki). This CERCLA covenant and language is required in the property deed under CERCLA Section 120(h)(3), so this responsibility remains as the property is transferred (Mr. Mike Wolfram).		
13	Mr. Tony Artero	Is the Navy's legal counsel here?
Response (Speaker): No, they're not here (Mr. Eric Shigaki).		
14	Mr. Jess Torres	Pending no further comments, how long before the ROD is signed?
Response (Speaker): That's site-specific depending on a number of factors, including coordinating reviews with Guam EPA and USEPA. We give the draft ROD to review, so it depends on how fast we can turn around comments on the document and agree on the ROD language. We expect it to take about six months (Mr. Eric Shigaki).		