

**FINDING OF SUITABILITY TO TRANSFER  
STOP 7 ½ NAVAL RESERVATION  
SAN JUAN, PUERTO RICO**

11 February 2004

**I. Purpose**

The purpose of this Finding of Suitability to Transfer (FOST) is to provide a summary of all environmental activities at the Stop 7 ½ Naval Reservation and to document the determination that site is suitable to transfer to the City of San Juan, PR for the intended use as a homeless shelter without unacceptable risk to human health and the environment. In addition, the FOST provides notice that the U.S. Navy has completed all necessary soil clean-up actions under CERCLA, thus enabling the U.S. Department of Health and Human Services (HHS) to assign the property to the City of San Juan. The Stop 7 ½ property requires no further environmental cleanup actions under CERCLA and is eligible to receive all required CERCLA covenants.

**II. Site Description and Background**

The Stop 7 ½ Naval Reservation is a 7.35-acre administrative/recreational complex located in the Puerto de Tierra business district of Old San Juan, PR (Figure 1-1). The site is comprised of a 4.94-acre landside parcel and a 2.24-acre oceanside parcel separated by Munoz Rivera Avenue. A portion of Munoz Rivera Ave. and the adjacent sidewalk make up the remaining 0.17 acres. Office buildings, storage buildings and residential housing occupy the landside parcel while the oceanside parcel is leased out to two tenants including the Reserve Officers Beach Club and the Dumas Restaurant (Figure 1-2)

The Department of the Army acquired this land by Executive Order in June 1903, although it has been used by the Navy since 1904. The land was transferred to the Navy in 1930. The site formerly functioned as the U.S. Naval Radio Station (1930 to 1952) until the radio station operations were moved to Naval Security Group Activity, Sabana Seca, Puerto Rico. Although several organizations have leased the space and buildings since 1930, no industrial or manufacturing activities are known to have been conducted at the site. The last occupant of the landside parcel was the Federal Bureau of Prisons who used the site for administrative offices and employee housing up until the mid-1990s. The landside parcel has remained unoccupied since that time.

Excessing activities at the site began in the early 1990s but environmental issues had prevented transfer actions from proceeding. Numerous environmental investigations conducted by the U.S. Navy beginning in 1994 identified soils contaminated with polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs), lead, and arsenic as well as asbestos and lead-based paint in office buildings and housing units.

In 2002, the City of San Juan submitted an application to HHS to use Stop 7 ½ for the purpose of housing homeless women and children under the McKinney Act. In order to expedite the transfer process, the U.S. Navy agreed to address all CERCLA-related contaminated soil issues and the City of San Juan agreed to address the non-CERCLA lead-based paint and asbestos issues. In April 2003, HHS agreed to assign Stop 7 ½ to San Juan contingent upon the Navy's completion of all CERCLA clean-up actions. The non-CERCLA cleanup to be completed by San Juan will be covenanted in the Public Benefit Conveyance.

### **III. Environmental Condition of the Property**

#### **A. Initial Site Investigation Activities**

As indicated above, The U.S. Navy began investigation activities at the site in 1994 with a Phase I Environmental Baseline Survey (EBS). Although no sampling was conducted, the Phase I EBS identified several areas of potential environmental concern including an incinerator-type structure, a concrete pad possibly contaminated with PCBs, several possible Underground Storage Tanks (USTs), and three possible machine gun embankments. Due to these issues, a Phase II EBS was recommended.

A Phase II EBS including sampling was conducted in 1998. Sampling was conducted at each of the areas of concern identified during the Phase I EBS. The sampling found elevated levels of arsenic at the machine gun embankments, confirmed the presence of two USTs, and determined that the concrete pad contained PCBs. The Phase II recommended additional sampling to establish a background range for arsenic and to delineate the extents of the PCB contamination for purposes of removal. Additional investigation of the USTs at Buildings 445 and 449 was also recommended.

A Sample Strategy Plan (SSP) was prepared in March 2000 that proposed sampling and data collection methods to establish background metal concentrations, confirm and delineate the areas of suspected contamination, establish soil disposal options, and perform a lead and asbestos survey. As part of the SSP surface soil sampling and concrete chip sampling was conducted at the transformer pad and surface soil samples were collected in relation to the incinerator. Background surface soils samples were collected from within the Stop 7.5 property and the adjacent Muñoz Rivera Public Park. Surface soil samples were also collected from the area of the former machine gun stations.

The results for all the samples collected as part of the SSP were presented in Appendix A of the Draft Final Site Investigation (SI) Work Plan prepared in 2002. The sampling proposed for the lead and asbestos survey were performed in the Remediation Plan as discussed below.

A Remediation Plan was prepared in April 2000 to further delineate the areas of concern referenced in the EBS Phase II recommendations. It was also determined that a lead-based paint and asbestos survey was necessary. Samples were collected from the residential structures for lead-based paint and asbestos containing material. Additionally, soil samples were collected from around the building footprints and the playground area. The soil samples revealed elevated levels of lead at several locations throughout the property.

A Risk Assessment was then performed to determine the remediation alternative for the asbestos and lead based paint. In order to establish a cleanup goal for the Remediation Plan, additional soil samples were taken from several locations throughout the property and off-site to establish a background level for lead. The samples collected from on-site showed elevated levels of lead, whereas the sample from off-site showed low-levels of lead. A Remediation Plan could not be written until additional soil sampling was conducted to delineate the lead contamination in the on-site soils.

In July 2000, two USTs located next to the garage at Building 449 and adjacent to Building 445 were removed. Confirmation samples were collected during the time of the UST removal, with samples collected at the base and sides of the excavation. After reviewing the UST Closure Reports for both tanks the Puerto Rico Environmental Quality Board (PREQB) determined that no further actions were required at the Bldg. 449 UST, but required the Navy to perform a Site Characterization for the UST at Bldg. 445. The impact of the leaking UST at Bldg. 445 was investigated and characterized in November 2000. Surface and subsurface soil sampling was conducted in the area of the UST excavation. The resulting information was summarized in a Site Characterization/Site Assessment Report. All detected soil

concentrations were below the PREQB target level for Total Petroleum Hydrocarbons (TPH)-Diesel Range Organics (DRO) and no further actions were required.

## **B. Detailed Site Investigation Activities**

A detailed Site Investigation (SI) was completed in March 2003 to address data gaps identified in previous reports and to fully delineate areas of soil contamination requiring remediation. The SI at Stop 7 ½ consisted of the collection of surface soil samples from designated background locations as well as numerous surface and subsurface soil samples from the Transformer Pad area and 50 ft. by 50 ft. sample grids located inside the Stop 7 ½ compound.

The results of the SI indicated that there were four constituents of concern in the soil at Stop 7.5 including PAHs, arochlor-1260 (PCB), arsenic, and lead. However, several data gaps regarding the extent of soil contamination remained at the conclusion of SI activities and U.S. EPA Region 2 required the Navy to perform additional sampling activities and to prepare a human health risk assessment. This additional sampling and the results of the risk assessment were documented in an Addendum to the Site Investigation Report submitted in June 2003. The extent and distribution of all contaminants of concern as presented in the SI Addendum are presented in Figures 3-1 through 3-5.

## **C. Site Remediation Activities**

The Risk Assessment concluded that exposure to environmental conditions at Stop 7 ½ exceeded USEPA's acceptable criteria. Therefore, preliminary remediation goals (PRGs) for surface and subsurface soil based on future residential use of the site were developed as follows:

Benzo(a)pyrene	0.087 mg/kg
Arochlor 1260	1 mg/kg
Lead	400 mg/kg

Although arsenic was identified as being above the EPA Region III residential RBC, it was determined that the approximate post-remediation risk to potential residential receptors would be within the acceptable range at  $5.1 \times 10^{-5}$  after the removal of PCB, benzo(a)pyrene, and lead in soils. However, the Navy, EPA Region II and PREQB agreed that the excavation of soils from two areas that contained the highest concentrations of arsenic would be performed as a conservative measure.

A separately bound Engineering Evaluation/Cost Analysis (EE/CA) was developed concurrently with the SI Report to evaluate potential technologies and remedial alternatives for cleaning up the contaminated soils. An Action Memorandum was then prepared that sets forth the Navy's selected alternative. The alternative chosen included excavation and off-site disposal of contaminated soils.

Remedial design documents including a Basis of Design, a Remediation Work Plan, and Technical Specifications were prepared in the summer of 2003 and on site soil excavation activities commenced in August 2003. Remedial activities were completed in Sept. 2003 when confirmation samples indicated that all remediation goals were achieved. All excavated areas were backfilled with clean fill, covered with topsoil, revegetated, and the site restored to suitable conditions. Figure 2 is an as-built drawing indicating the areas where excavation activities actually occurred in the field.

An additional UST adjacent to Bldg. 443 was discovered during remedial activities. The tank was removed November 2003 and soil samples obtained from the tank excavation indicated non-detectable concentrations of TPH. A UST Closure Assessment Report (CAR) was prepared in December 2003 and

submitted to PREQB for approval. Approval was granted via letter from PREQB dated 9 Feb 2004 (Attachment A).

**IV. Environmental Protection Provisions**

As required by CERCLA as amended by CERFA (§9620 (h)(4)(D)), the deed of transfer for property to be transferred to the City of San Juan shall contain:

- a covenant warranting that the U.S. Navy has taken all remedial action necessary to protect human health and the environment at the Stop 7 ½ site and any response action or corrective action due to Navy activities found to be necessary after the date of transfer shall be conducted by the United States, and
- a clause granting the United States access to the property in any case in which a response action or corrective action is found to be necessary after such date at such property, or such access is necessary to carry out a response action or corrective action on adjoining property.

Asbestos containing materials are present on the property. The Deed shall require the grantee, its successors and assigns, to comply with all federal, state, and local laws related to asbestos containment/abatement.

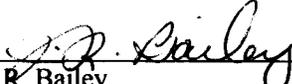
The buildings on the property contain lead-based paint. The Deed shall include a provision requiring the grantee to be responsible for compliance with all applicable Federal, State, and local laws, ordinances, orders, and regulations relating to lead-based paint including taking steps for its abatement or removal. After completing any lead-based paint abatement activities, the Grantee shall complete and execute a Certificate of Completion of Lead Abatement.

**V. Regulator Coordination**

The Navy has worked closely with The Puerto Rico Environmental Quality Board (PR EQB) and the US Environmental Protection Agency (US EPA) Region 2 throughout the investigation and remediation process to ensure that all regulatory concerns were addressed. Review and concurrence with all remedial activities including the Site Investigation, EE/CA, Action Memorandum, Basis of Design, Remedial Action Work Plan, Close-Out Report, and UST Reports has been received.

**VI. Finding Of Suitability to Transfer**

I, the undersigned, have determined that subject to the inclusion of the appropriate deed notices and covenants as described above, the property described in this Finding of Suitability for Transfer for the Stop 7 ½ property in San Juan, PR, and proposed for transfer to the City of San Juan, PR is suitable for the intended reuse and that to allow such uses would be protective of human health and the environment.

  
\_\_\_\_\_  
J.R. Bailey  
Head, Environmental Programs Branch  
Atlantic Division, Naval Facilities Engineering Command

02/11/04  
Date





COMMONWEALTH OF PUERTO RICO  
OFFICE OF THE GOVERNOR

February 9, 2004

Mr. Pedro Ruiz  
U.S. Naval Station Roosevelt Roads  
PSC 1008 Box 3021  
FPO AA 34051-3021

SUBJECT: CLOSURE REPORT  
NAVAL RESERVATION BLDG. 443  
STOP 7½  
SAN JUAN, P.R.  
PR# 02-00-0016

Dear Mr. Ruiz:

The Underground Storage Tanks Management Division (USTMD) of the Water Quality Section (WQS) of the Environmental Quality Board (EQB) received on January 16, 2004 the following document for the appropriate revision and evaluation: *Underground Storage Tank Closure Assessment Report*. This document contains the analysis results of the soil sampling performed in the area where a 2,000-gallon diesel underground storage tank was located. The consultant company Shaw Environmental, Inc. prepared the report.

After evaluating the information submitted, the following statements apply:

1. Benzene, toluene, ethyl benzene and total xylene (BTEX) concentrations; as well as total petroleum hydrocarbons (TPH) concentrations in the soil sampling performed from the tank excavation were below the method detection limits or below the USTMD permitted limits.
2. Tank notification was submitted in conjunction with this report.

Based on the data submitted in the document *Underground Storage Tank Closure Assessment Report* prepared by the company Shaw Environmental, Inc. the Water Quality Area relieves the U.S. Department of the Navy, from any additional environmental

study where the Underground Storage Tank (UST) was located, Facility # PR 02-00-0016. However, records of this closure report must be maintained for a minimum of three years to comply with the federal requirements 40 CFR 280.24 (b) and (5); 40 CFR 280 Subpart G of September 27, 1988; and Part VII of the Puerto Rico Underground Storage Tank Control Regulation of November 7, 1990.

This facility was relieved from the List of Facilities Under Corrective Actions (LUST) on March 21, 2002.

To clarify any doubts or questions you can contact Mr. Manuel Ceide, Environmental Specialist from USTMD at telephone number (787) 787-8181 Ext. 2608. Also, you can visit our offices located at 431 Ponce de Leon Ave., National Plaza Building, 5<sup>th</sup> Floor, Hato Rey, Puerto Rico.

Cordially,

Signed/

Ing. Rubén González, Director  
Water Quality Area



ESTADO LIBRE ASOCIADO DE PUERTO RICO  
OFICINA DE LA GOBERNADORA

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FEB 2/10  
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2/10

9 de febrero de 2004

Sr. Pedro Ruíz  
U.S. Navy Station Roosevelt Roads  
PSC 1008 Box 3021  
FPO AA 34051-3021

RE: **INFORME DE CIERRE**  
**NAVAL RESERVATION BLDG. 443**  
**PARADA 7 ½**  
**SAN JUAN, P.R.**  
**PR#02-00-0016**

Estimado señor Ruíz:

La División para el Manejo de Tanques de Almacenamiento Soterrados (DMTAS) del Area de Calidad de Agua (ACA) de la Junta de Calidad Ambiental (JCA) recibió el 16 de enero de 2004, para revisión y evaluación correspondiente el documento *Underground Storage Tank Closure Assessment Report* con los resultados del muestreo de terreno realizado en el área donde se encontraba un (1) tanque de almacenamiento soterrado (TAS) de 2,000 galones para el almacenaje de diesel en la facilidad en referencia. El informe fue preparado por la compañía consultora Shaw Environmental, Inc.

Posterior a la evaluación del documento, se ha determinado lo siguiente:

1. Las concentraciones de benceno, tolueno, etilbenceno y xilenos totales (BTEX, por sus siglas en inglés) así como las concentraciones de hidrocarburos totales de petróleo (TPH, por sus siglas en inglés) en las muestras de terreno de la fosa donde se encontraba el TAS que almacenaba diesel estuvieron por debajo de los límites de detección del método de análisis o de los límites permitidos por la DMTAS.
2. La notificación de cierre fue sometida junto con el informe.

A base de los datos sometidos en el documento *Underground Storage Tank Closure Assessment Report* preparado por la compañía Shaw Environmental, Inc. El Area de Calidad de Agua releva al Departamento de la Marina de Estados Unidos, de cualquier estudio ambiental adicional a realizarse en el área donde se encontraba el TAS en la facilidad 00-0016. Sin embargo, el expediente de este cierre, deberá mantenerse por lo menos tres (3) años para cumplir con los requisitos federales (Secciones 280.24 (b) y (5) y Subparte G del Código de Reglamento Federales (CFR, por sus siglas en inglés)) promulgados el 27 de septiembre de 1988 y de la Parte VII del Reglamento para el Control de Tanques de Almacenamiento Soterrados promulgado por esta Junta el 7 de noviembre de 1990.

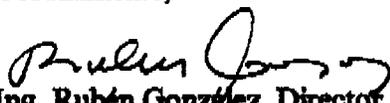
*Verdes Bosques y Aguas Claras, Aire Limpio y Nubes Blancas: ¡Cuides la Vida si no la Contaminas!*  
EDIFICIO NACIONAL, PLAZA, 491 AVE. PONCE DE LEON, HATO REY, PUERTO RICO 00917  
APARTADO 11488 BANTURCK, PUERTO RICO 00910 TELEFONO: 767-8181

**CONT. INFORME DE CIERRE  
NAVAL RESERVATIONS BLDGS. 443  
PR# 02-00-0016  
PAGINA 2**

Esta facilidad fue relevada de la Lista de Facilidades en Acciones Correctivas (LUST List, por sus siglas en inglés) el 21 de marzo de 2002.

Para aclarar cualquier duda o pregunta se puede comunicar con la Sr. Manuel Ceide, Especialista Ambiental de la DMTAS al teléfono 767-8181 Ext. 2608. También, nos pueden visitar en nuestras oficinas localizadas en la Ave. Ponce de León # 431, Edificio Nacional Plaza, Quinto Piso, Hato Rey, Puerto Rico.

Cordialmente,

  
Ing. Rubén González, Director  
Area de Calidad de Agua



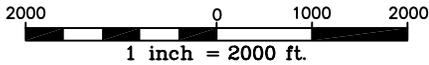
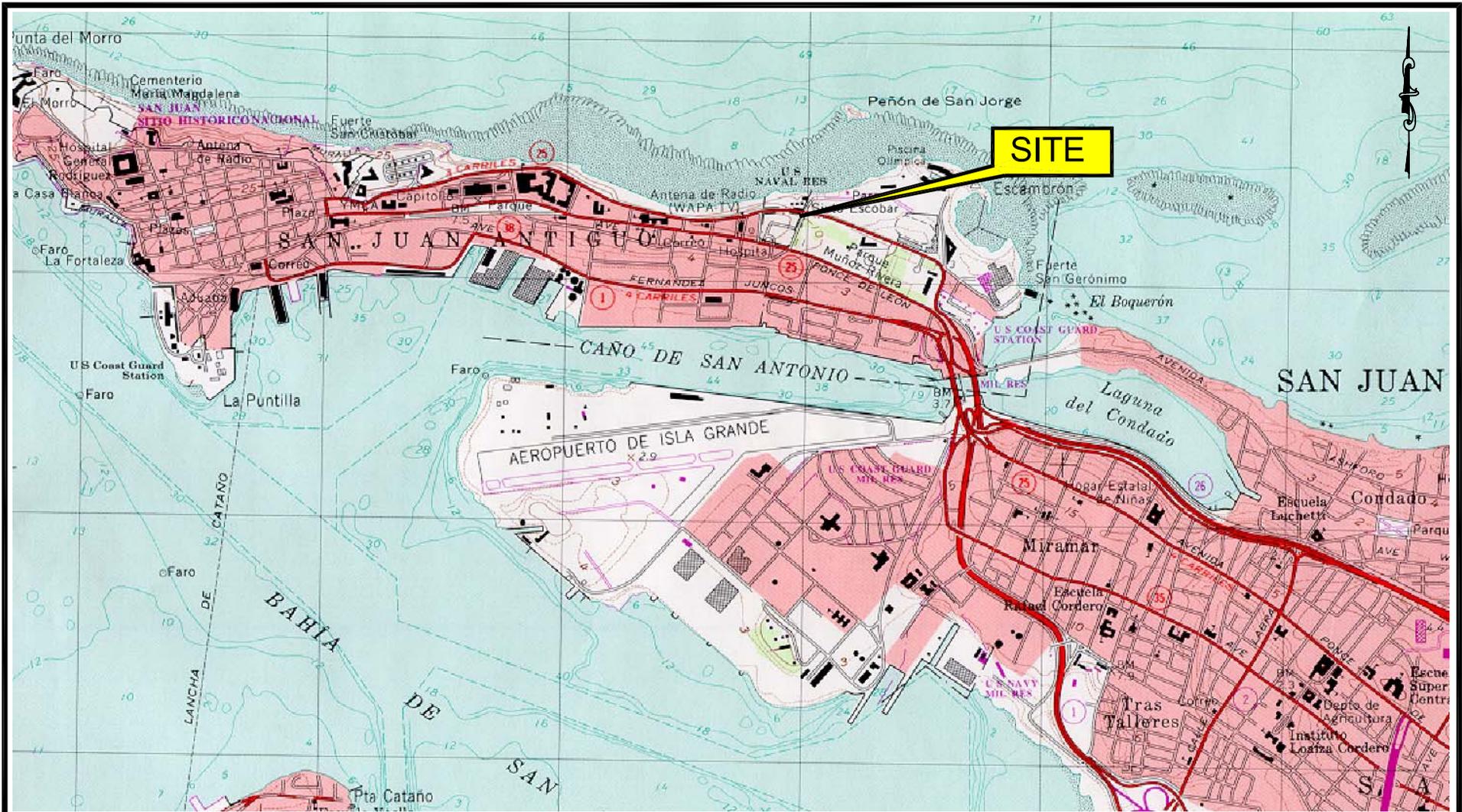
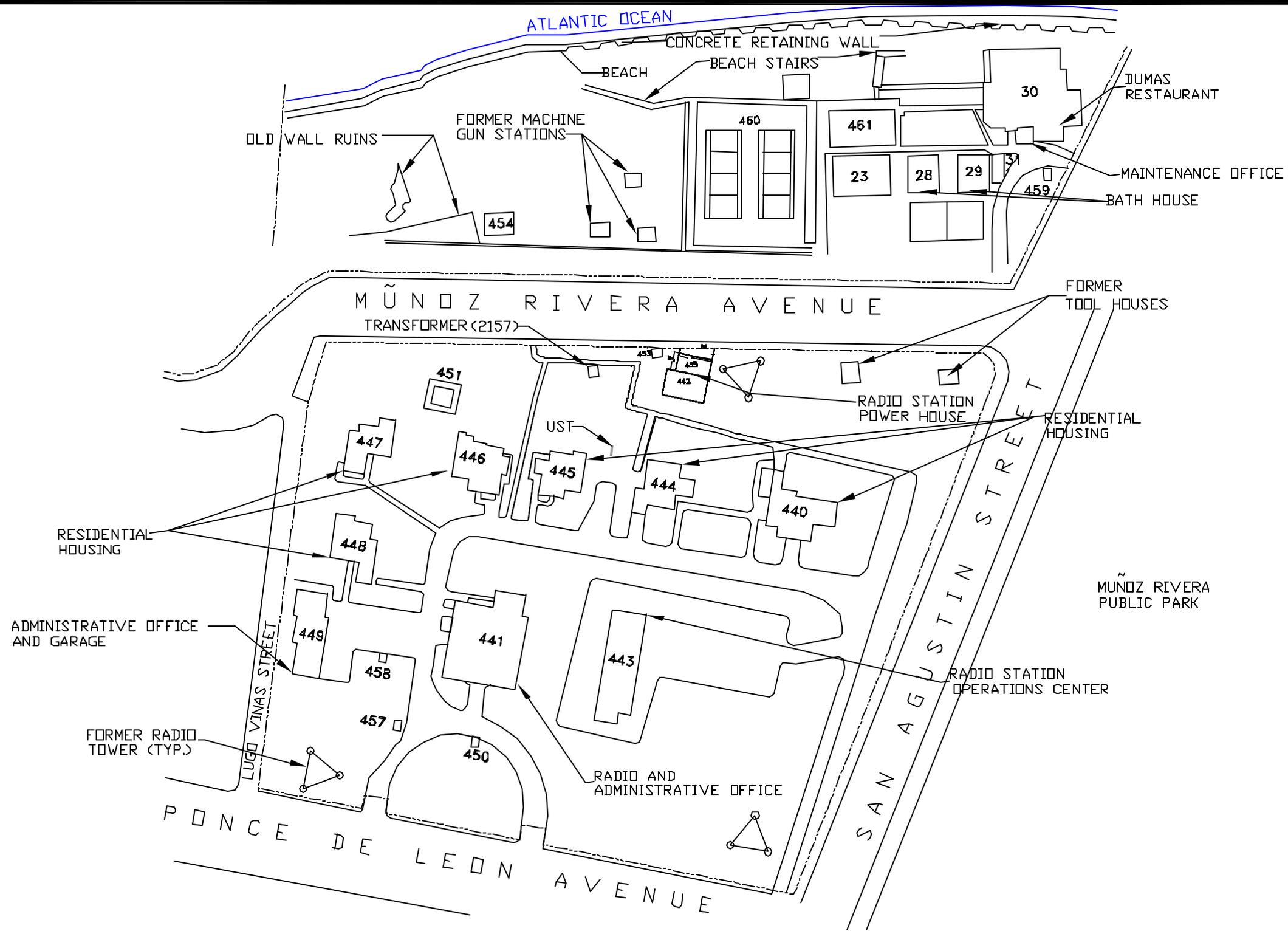


FIGURE 1-1  
SITE LOCATION MAP

STOP 7.5 NAVAL RESERVATION  
SAN JUAN, PUERTO RICO

SOURCE: U.S.G.S. TOPOGRAPHIC QUADRANGLE.



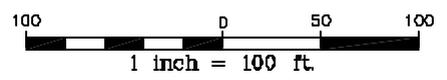
**LEGEND**

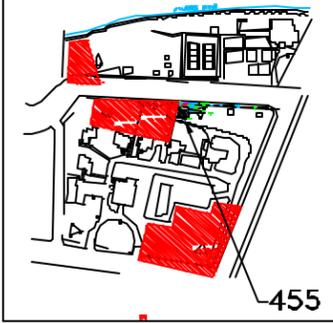
- - DENOTES FORMER STRUCTURE
- - - - PROPERTY BOUNDARY
- - - - FORMER UST LOCATION

SOURCE: ICF KAISER.

**FIGURE 1-2  
SITE PLAN**

**STOP 7.5 NAVAL RESERVATION  
SAN JUAN, PUERTO RICO**

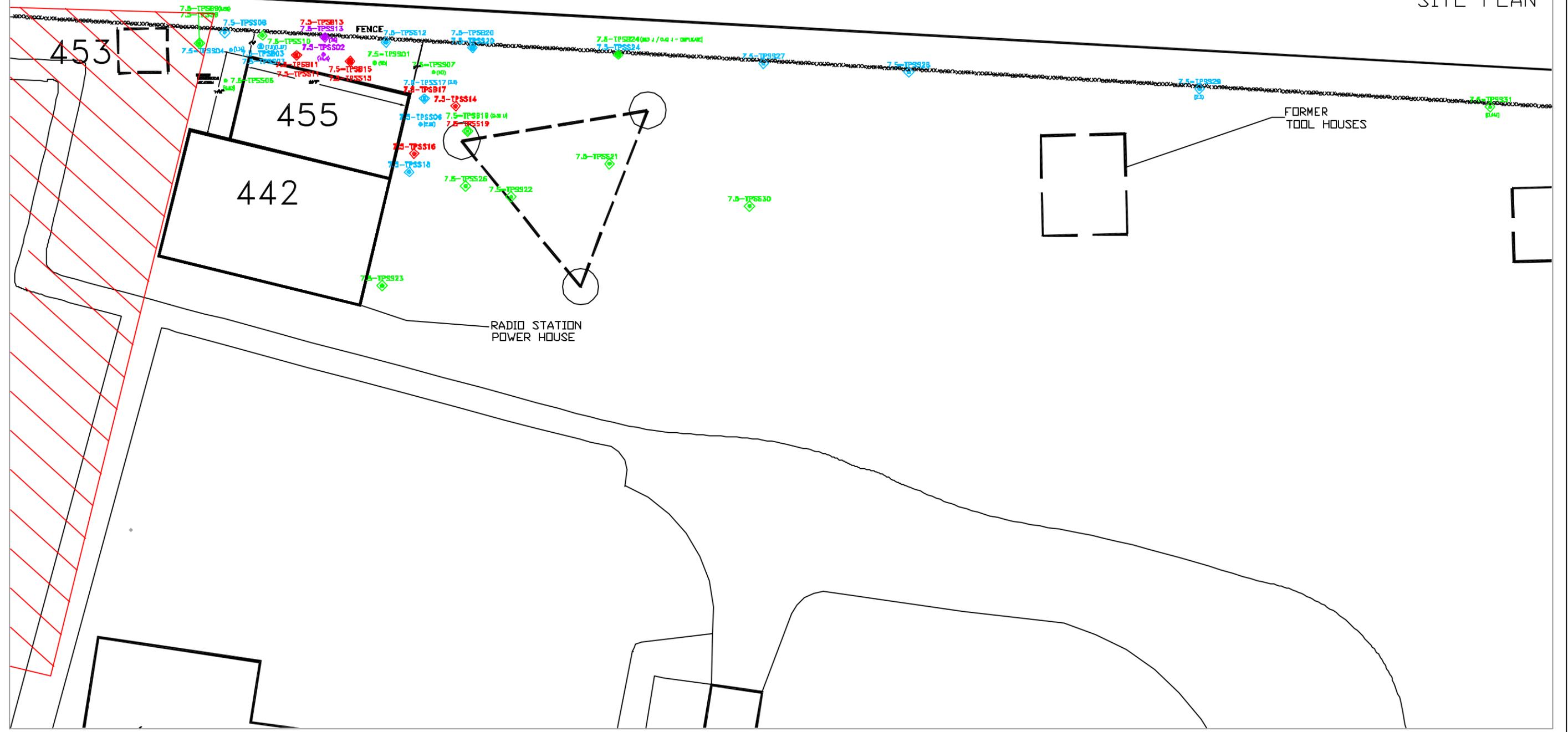




455

SITE PLAN

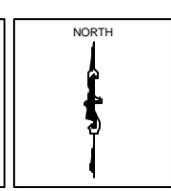
MUNOZ RIVERA AVENUE



- ▨ - ARCHAEOLOGICAL SENSITIVE AREAS
- ◆ - TRANSFORMER PAD SURFACE SOIL SAMPLE LOCATIONS (0-6") (MARCH 2000)
- ◆ - TRANSFORMER PAD SURFACE SOIL SAMPLE LOCATIONS (6-12") (MARCH 2000)
- ◆ - APPROXIMATE INCINERATOR SURFACE SOIL SAMPLE LOCATIONS (0-6") (MARCH 2000)
- ◆ - TRANSFORMER PAD SURFACE SOIL SAMPLING LOCATIONS (0-6") (NOVEMBER 2002)
- ◆ - TRANSFORMER PAD SURFACE AND SUBSURFACE SOIL SAMPLING LOCATIONS (0-6") - (6-24") (NOVEMBER 2002)
- (U) - APPROX 1200 CONCENTRATION (mg/kg)
- (N) - PCBs WERE NOT DETECTED
- (NA) - NOT ANALYZED FOR PCBs

PCB RESULTS (mg/kg)	
◆	< 1
◆	1 - 10
◆	10 - 100
◆	> 100

DRAWN  
REVIEWED  
S.O.# 100996 (CTO 011)  
CADD# 2259516W  
CLEAN III/CTO 011/Final SI Addendum



STOP 7.5 NAVAL RESERVATION  
SAN JUAN, PUERTO RICO

BAKER ENVIRONMENTAL, Inc.  
Coraopolis, Pennsylvania

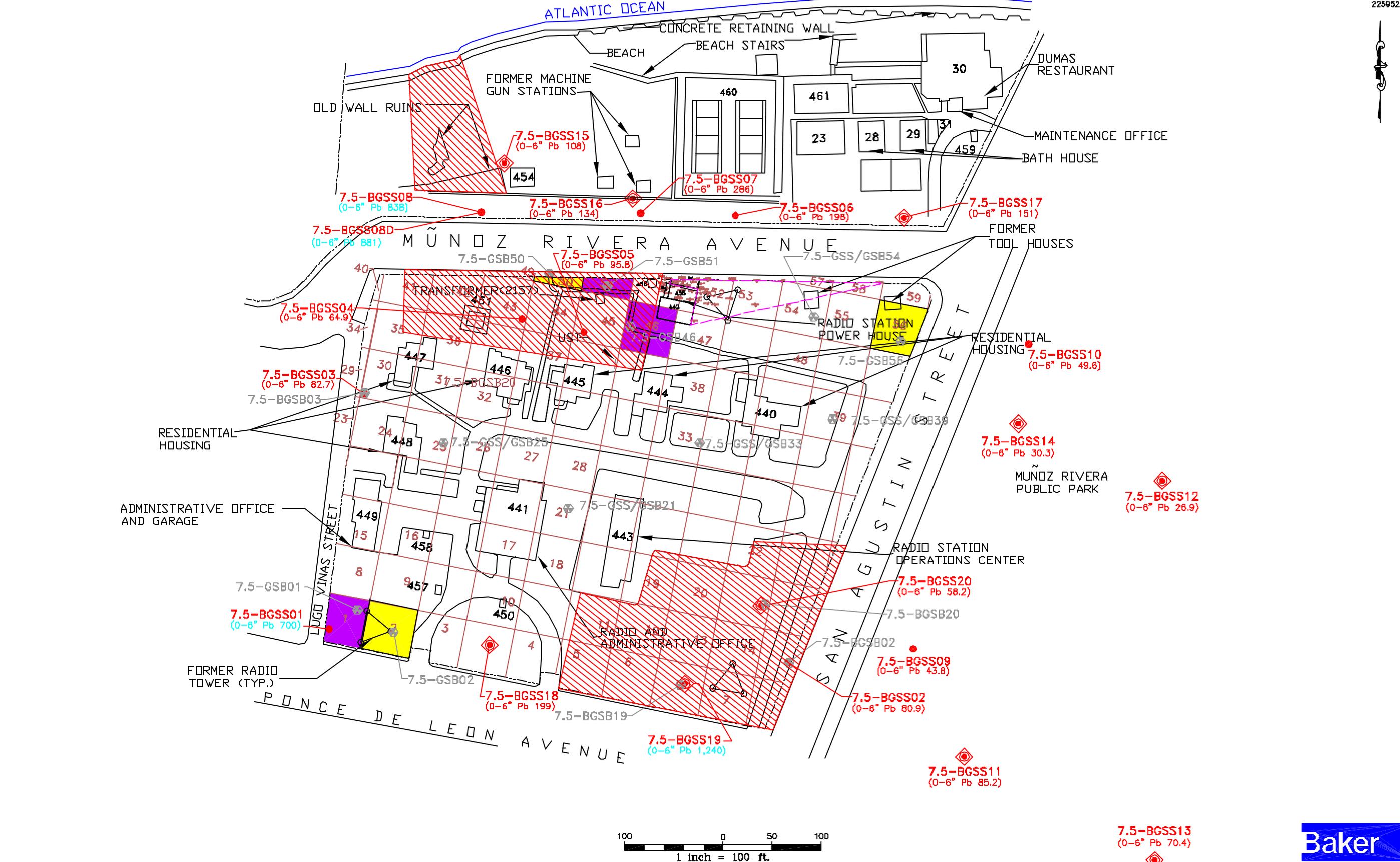


PCB RESULTS IN TRANSFORMER PAD SOIL SAMPLES

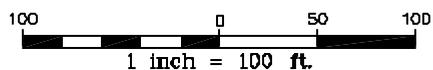
SCALE 1" = 8'

DATE JANUARY 2003

FIGURE  
**3-1**



- (0-6" Pb 1,240) SURFACE SOIL EXCEEDS 400 ppm FOR LEAD
- 9 SURFACE SOIL RESULT < 400 ppm FOR LEAD
- YELLOW SURFACE SOIL RESULT EXCEEDS 400 ppm FOR LEAD
- PURPLE SURFACE SOIL RESULT EXCEEDS 400 ppm FOR LEAD



**LEGEND**

- ▨ - ARCHEOLOGICAL SENSITIVE AREAS
- - PROPERTY BOUNDARY
- - EXCAVATION AREA BOUNDARY
- ◊ - BACKGROUND SURFACE SOIL LOCATION (NOV. 2002)
- - BACKGROUND SURFACE SOIL LOCATION (APRIL 2000)
- ⊙ - SOIL SAMPLE LOCATION (MARCH 2003)

SOURCE: ICF KAISER.

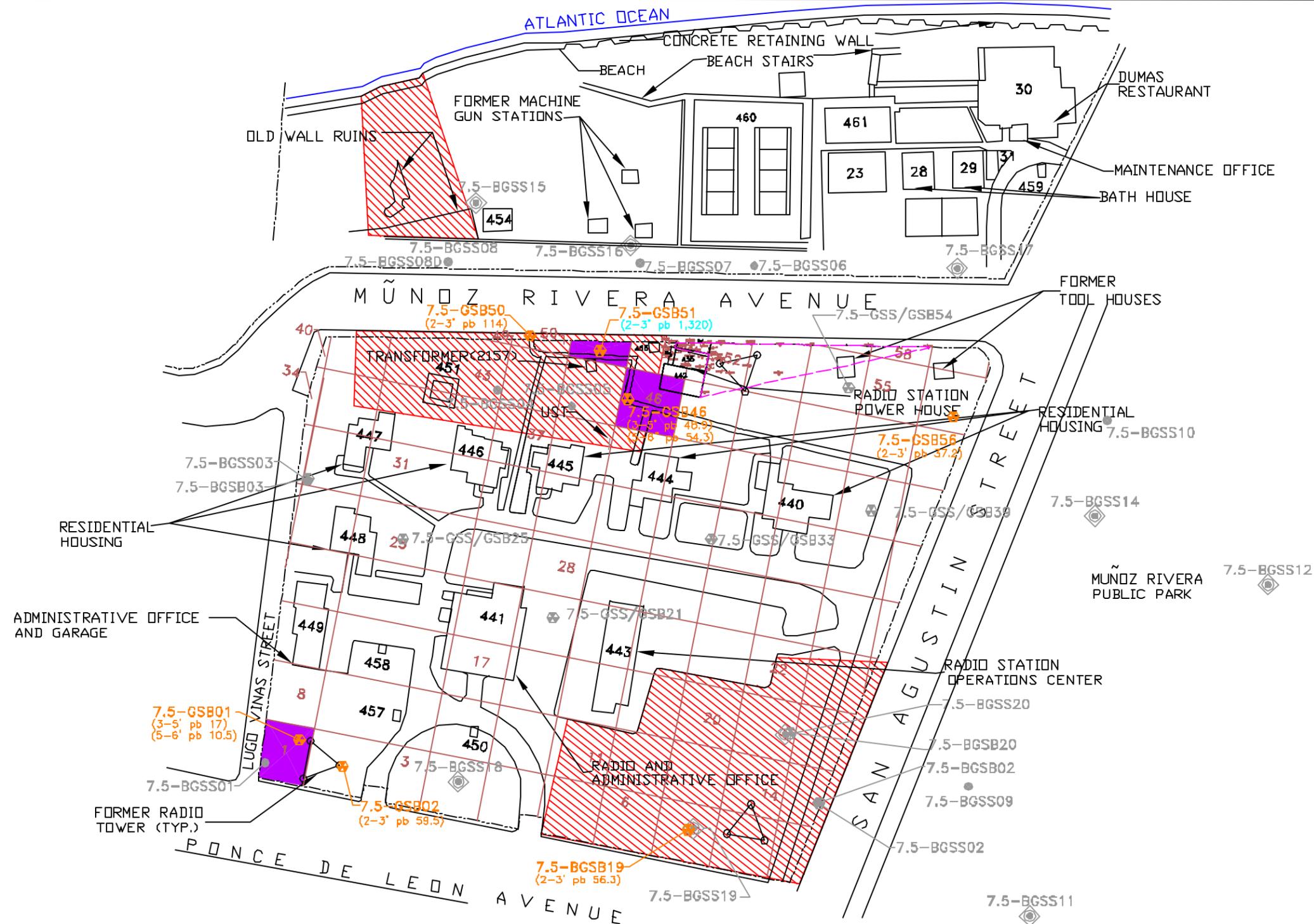
**7.5-BGSS13**  
(0-6" Pb 70.4)

**FIGURE 3-2**

**SURFACE SOIL LEAD RESULTS**

STOP 7.5 NAVAL RESERVATION  
SAN JUAN, PUERTO RICO

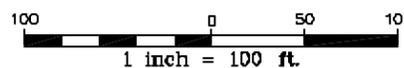




(2-3' pb 1,320) SUBSURFACE SOIL EXCEEDS 400 ppm FOR LEAD

8 SUBSURFACE SOIL RESULT < 400 ppm FOR LEAD

0.5 - 2.0' SUBSURFACE SOIL RESULT EXCEEDS 400 PPM LEAD



LEGEND

- ARCHEOLOGICAL SENSITIVE AREAS
- PROPERTY BOUNDARY
- EXCAVATION AREA BOUNDARY
- BACKGROUND SURFACE SOIL LOCATION (NOV. 2002)
- BACKGROUND SURFACE SOIL LOCATION (APRIL 2000)
- SOIL SAMPLE LOCATION (MARCH 2003)

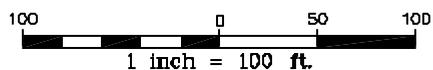
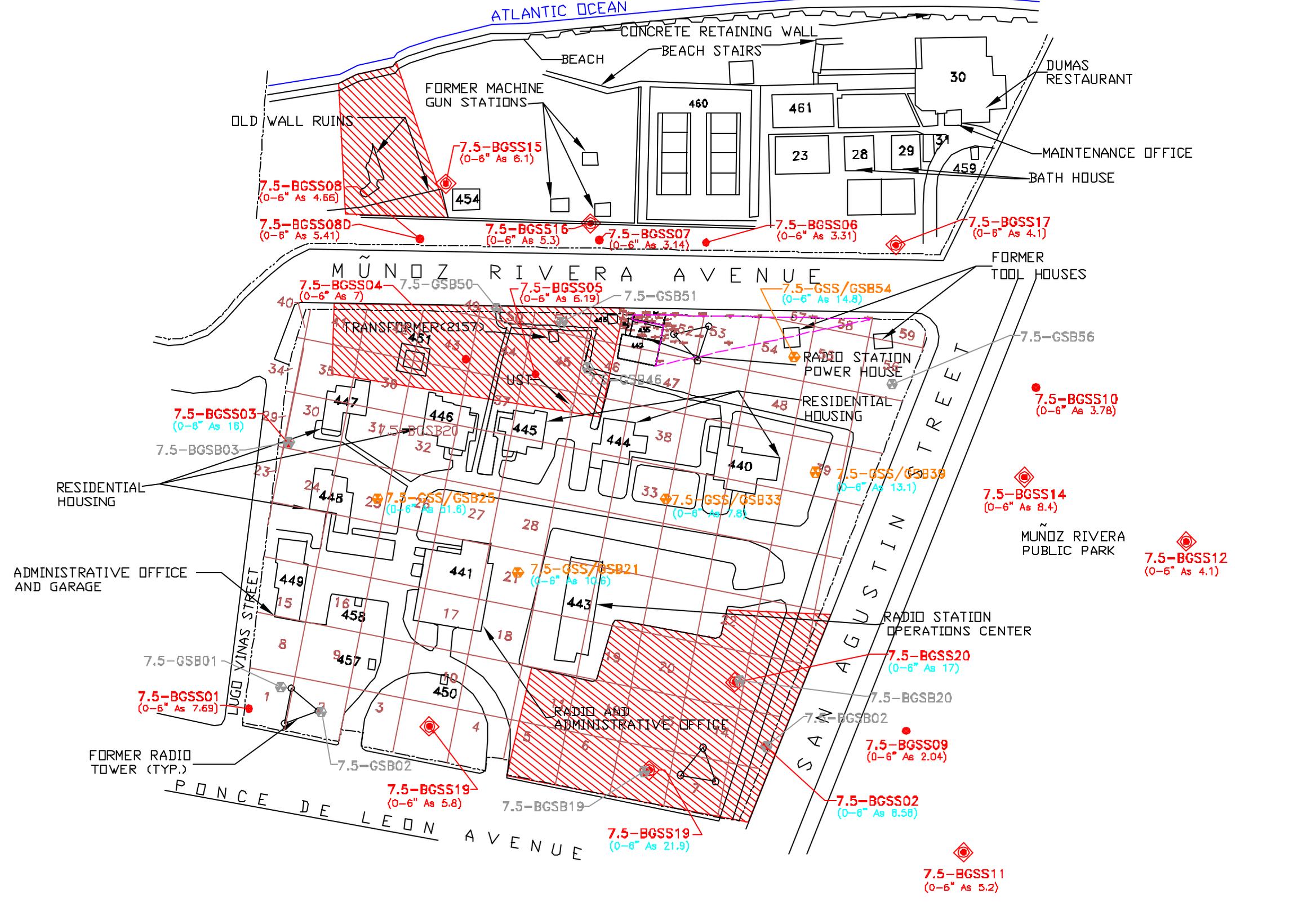
SOURCE: ICF KAISER.



FIGURE 3-3

SUBSURFACE SOIL LEAD RESULTS

STOP 7.5 NAVAL RESERVATION  
SAN JUAN, PUERTO RICO



**LEGEND**

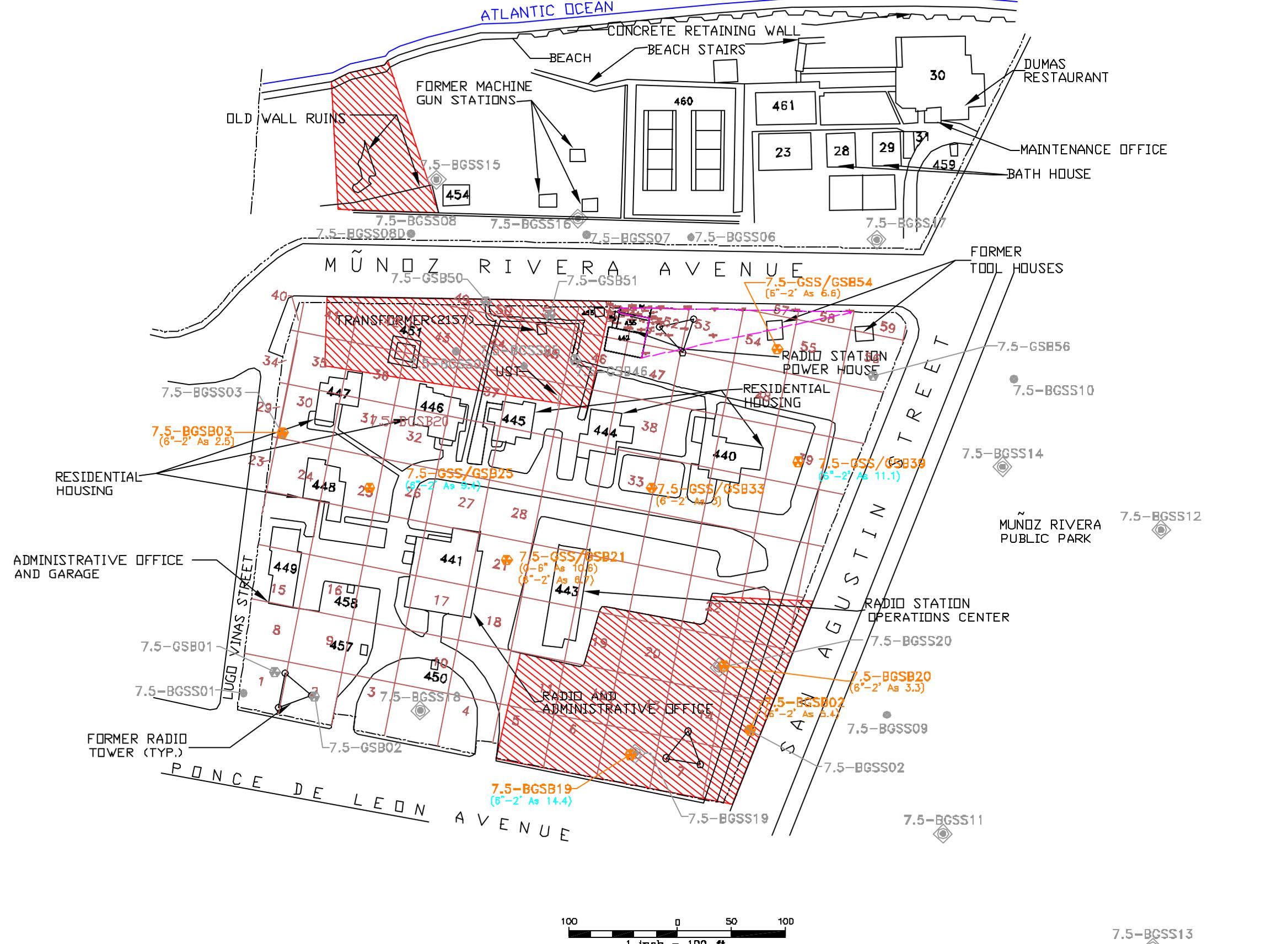
- ARCHEOLOGICAL SENSITIVE AREAS
- PROPERTY BOUNDARY
- EXCAVATION AREA BOUNDARY
- BACKGROUND SURFACE SOIL LOCATION (NOV. 2002)
- BACKGROUND SURFACE SOIL LOCATION (APRIL 2000)
- SOIL SAMPLE LOCATION (MARCH 2003)

SOURCE: ICF KAISER.

**FIGURE 3-4**  
**SURFACE SOIL ARSENIC RESULTS**  
 STOP 7.5 NAVAL RESERVATION  
 SAN JUAN, PUERTO RICO



(0-6" As 21.9) SURFACE SOIL EXCEEDS 7.75 ppm FOR BACKGROUND ARSENIC



**LEGEND**

- ARCHEOLOGICAL SENSITIVE AREAS
- PROPERTY BOUNDARY
- EXCAVATION AREA BOUNDARY
- BACKGROUND SURFACE SOIL LOCATION (NOV. 2002)
- BACKGROUND SURFACE SOIL LOCATION (APRIL 2000)
- SOIL SAMPLE LOCATION (MARCH 2003)

SOURCE: ICF KAISER.

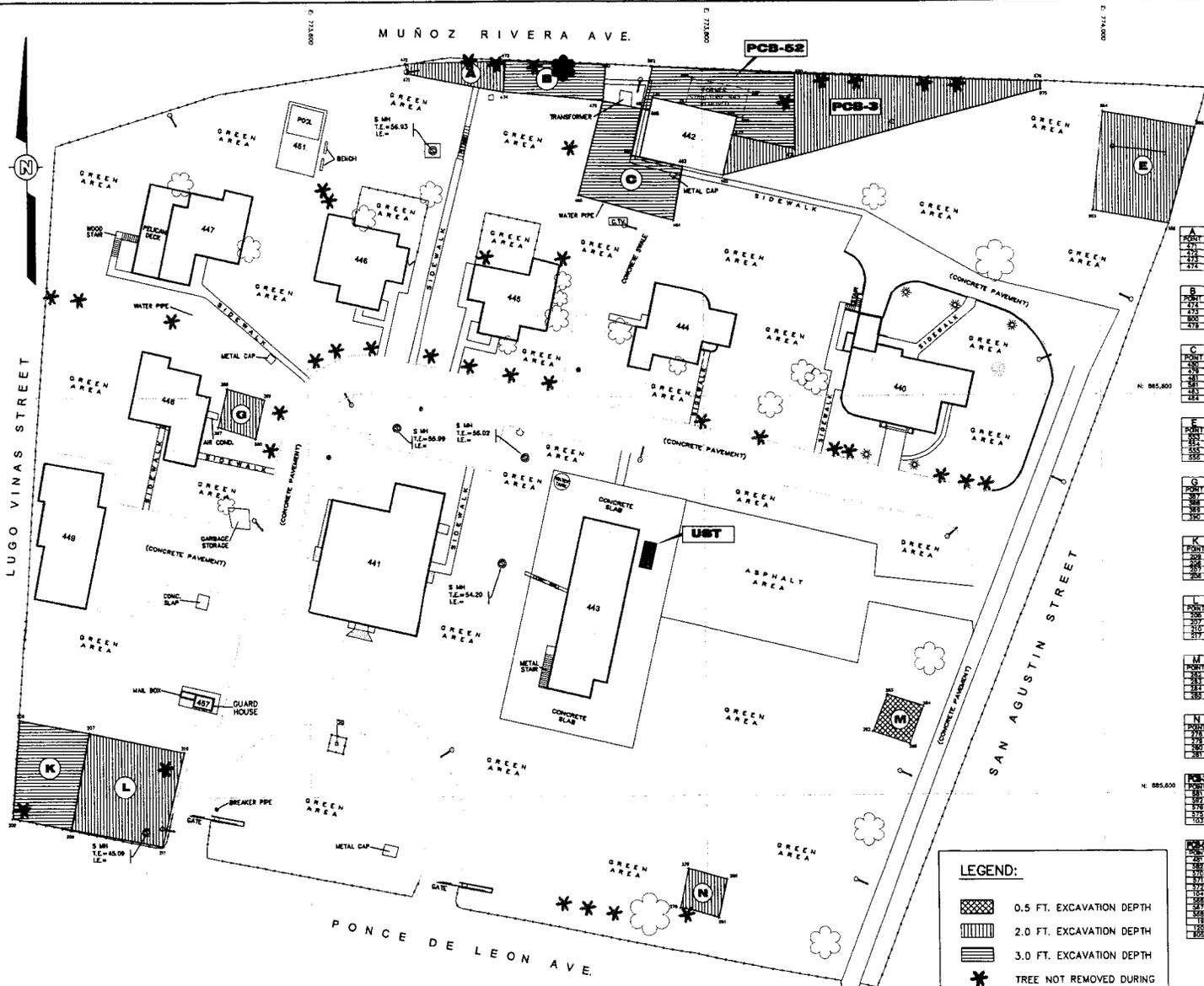
**FIGURE 3-5**  
**SUBSURFACE SOIL ARSENIC RESULTS**

STOP 7.5 NAVAL RESERVATION  
 SAN JUAN, PUERTO RICO

(6"-2" As 14.4) SUBSURFACE SOIL EXCEEDS 7.75 ppm FOR BACKGROUND ARSENIC

OFFICE DRAWING NUMBER  
Pittsburgh, PA 844344-D4

File: G:\Projects\LANDM\Projects\844344\844344.dwg  
Plot Date: 11/27/2003 12:46pm  
Plot Size: 11.00 x 17.00  
Plot Scale: 1/8" = 1'-0"



POINT	NORTHING	EASTING	ELEVATION	DESCRIPTION
471	88521.840	77261.718	91.81	A-1
472	88521.935	77262.085	48.88	B-1
473	88521.930	77262.085	48.88	B-1
474	88521.810	77262.085	48.88	A-2
475	88521.804	77262.091	48.00	B-1
476	88521.800	77262.091	48.00	B-1
477	88521.800	77262.091	48.00	B-1
478	88521.800	77262.091	48.00	B-1
479	88521.800	77262.091	48.00	B-1
480	88521.800	77262.091	48.00	B-1
481	88521.800	77262.091	48.00	B-1
482	88521.800	77262.091	48.00	B-1
483	88521.800	77262.091	48.00	B-1
484	88521.800	77262.091	48.00	B-1
485	88521.800	77262.091	48.00	B-1
486	88521.800	77262.091	48.00	B-1
487	88521.800	77262.091	48.00	B-1
488	88521.800	77262.091	48.00	B-1
489	88521.800	77262.091	48.00	B-1
490	88521.800	77262.091	48.00	B-1
491	88521.800	77262.091	48.00	B-1
492	88521.800	77262.091	48.00	B-1
493	88521.800	77262.091	48.00	B-1
494	88521.800	77262.091	48.00	B-1
495	88521.800	77262.091	48.00	B-1
496	88521.800	77262.091	48.00	B-1
497	88521.800	77262.091	48.00	B-1
498	88521.800	77262.091	48.00	B-1
499	88521.800	77262.091	48.00	B-1
500	88521.800	77262.091	48.00	B-1
501	88521.800	77262.091	48.00	B-1
502	88521.800	77262.091	48.00	B-1
503	88521.800	77262.091	48.00	B-1
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599	88521.800	77262.091	48.00	B-1
600	88521.800	77262.091	48.00	B-1

**LEGEND:**

- 0.5 FT. EXCAVATION DEPTH
- 2.0 FT. EXCAVATION DEPTH
- 3.0 FT. EXCAVATION DEPTH
- TREE NOT REMOVED DURING EXCAVATION



REFERENCE:  
TAKEN FROM DRAWING PREPARED BY JAVIER E. SIKOT & ASSOCIATES, P.C. TITLED "EXISTING CONDITIONS", FILE NAME: EC-1058-NA.DWG.

DEPARTMENT OF THE NAVY  
ATLANTIC DIVISION  
NAVAL STATION  
NAVAL RESERVATION  
SAN JUAN, PUERTO RICO

STOP 7-12 REMEDIAL ACTION  
SITE AS-BUILT CONDITIONS

Shaw Environmental, Inc.  
CHECKED BY: M. Planch (M/PL) REV: DATE BY: CHD/JP/PC  
DRAWN BY: A. Shaw (A/SA) APPROVED BY: M. Planch (M/PL)

REVISIONS

FIGURE 2