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OFFICE OF THE GOVERNOR

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Amanda Cruz  
US EPA Region 9  
75 Hawthorne St. (LND4-2)  
San Francisco, CA 94105

RE: CNMI BECQ Comments on Draft CNMI RAP:

Dear Ms. Cruz:

The Commonwealth of the Northern Mariana Islands Bureau of Environmental and Coastal Quality appreciates the opportunity to review and provide comments to the CNMI RAP for the Department of Fire and Emergency Medical Services (DFEMS) Marpi OB/OD storage and treatment unit. As you may know, the CNMI was heavily involved during World War II between Japan and the United States. The Battle of Saipan was fought with fierce force from both sides with exchange of gun fires and bombing from in the air and surrounding coastal water. After WW II, munitions and other explosives of concerns were left abandoned on Saipan. These munitions and explosives, till today, continue to present a serious threat to human health and the environment. In some instance, the hazards from these dangerous items have impeded economic development on the island. The approval for the renewal of the RCRCA OB/OD storage and treatment permit for the DFEMS Marpi site is a vital facility for the CNMI in order to continue to address the proper storage and disposal of munitions and other explosives of concerns on Saipan.

**II. General Permit Conditions:** The following are minor comments under the general permit conditions.

Page 7, Access to Communications or Alarm System; ...then the treatment event *will shall be* delayed.... Should this be *will be* or *shall be* delayed....

Page 7, Arrangement with Local Authorities; Is the DPS SOP supposed to be DFEMS SOP?

**III. Special Permit Conditions:**

- 11) BECQ recommends that under this permit condition, DFEMS coordinate with the CNMI Homeland Security and Emergency Management (HSEM) office for mass notification of any

scheduled treatment events. As in the past treatment event, HSEM office is responsible for providing emergency notification to local and federal stakeholders, i.e. FAA for airspace safety, Marianas Visitors Authority (MVA) for tour agent notification, fishermen and boating safety, etc.

- 18) BECQ recommends that under this permit condition, DFS coordinates with the Department of Public Safety (DPS) for road blocks in the Marpi area to control access during scheduled treatment events. DPS in the past was responsible to control access points to the Mapri area during scheduled treatment events.

#### V. Sampling and Analysis:

The proposed permit requires groundwater sampling at the site be conducted every 5 years from the effective date of the CNMI RAP for the Marpi OB/OD unit. However, BECQ believes that the groundwater data have shown no contamination as a result of unexploded ordnance disposal activities. The recent groundwater study (February 2018) conducted showed no explosives and energetic compounds, white phosphorous, or perchlorate detected in the groundwater. This results are comparable to the 2007 groundwater study 10 years later. Therefore, under this 10-year permit, BECQ strongly recommends that the sampling requirement should occur only once; to be conducted shortly before or at the end of the permit. While it is important to perform this sampling requirement under the permit, the current groundwater data collected over the past 10 years showing no contamination does not demonstrate the justification to place the CNMI in such serious economic burden to conduct sampling every five years.

Sincerely,



Eli D. Cabrera  
BECQ Administrator

Cc: Clyde K. Norita, DFEMS Commissioner  
John McCarroll, US EPA R9 PIO  
Carl Goldstein, US EPA R9 PIO