



Ralph DLG Torres
Governor

DEPARTMENT OF FIRE AND EMERGENCY MEDICAL SERVICES

Station 1 Tekken Drive
Civic Center Susupe



Victor B. Hocog
Lt. Governor

June 4, 2018

Amanda Cruz
USEPA, LND-4-2
75 Hawthorne Street
San Francisco, CA 94105

Hafa Adai and Warm Greetings:

Thank you for giving the CNMI Department of Fire and EMS the opportunity to comment on CNMI's bomb pit renewal permit application. Before the Environmental Protection Agency (EPA) was established here in the CNMI, the local people and government are doing their very best to clear all the Ordnance on the island that was left behind after World War II. Back in the 60's and 70's the local people will go through the jungle looking for scrap metal, mostly brass to trade them for cash at the local Recycling Center. Unfortunately, some of the ordnance are still here and the local government is still actively removing UXO when the community discovers them.

The bomb pit was built back in the early 2000's and averages at least once a year in detonating UXO or whenever it reaches its limit of 500 lbs. The local community and CNMI government is diligently working hard to clean the island up after the war.

The CNMI believes that the water sampling should occur once and shortly at the end or renewal of the permit duration of 10 years. Groundwater sampling places a serious financial burden on the CNMI and that the data from the sampling does not justify the need for shorter sampling when current data shows no contamination after 10 years. The new proposed permit requires sampling of groundwater after 5 years and the CNMI believes that the groundwater data sampling after 10 years shows no contamination and does not need to be done every 5 years for a 10 year permit.

Sincerely,

Claudio K. Norita
Commissioner of Fire and EMS