



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY



December 23, 2003

MEMORANDUM FOR NYS DEPT OF ENVMTL CONSERVATION
ATTN: MR. JAMES LISTER
Bureau of Eastern Remedial Action
625 Broadway, 11th Floor
Albany NY 12233-7015

FROM: AFRPA/DA Plattsburgh
304 New York Road
Plattsburgh NY 12903

SUBJECT: Environmental Documents for Proposed Transfer of Parcel A2.17, Florida Avenue,
Former Plattsburgh AFB NY

Submitted for your review and comments are the Draft Final Supplemental Environmental Baseline Survey (SEBS) and the Finding of Suitability to Transfer (FOST) for the subject proposal.

Request any comments to the attached documents by January 7, 2004.

Our point of contact is Steve Gagnier at (518) 563-2871, extension 14.

MICHAEL D. SOREL, PE
Site Manager/BRAC Environmental Coordinator

Attachments:

- 1. SEBS - Parcel A2.17
- 2. FOST - Parcel A2.17

cc:

- USEPA (Mr. Robert Morse) (Atch under sep cover)
- NYSDEC Region 5 (Mr. Richard Wagner)
- NYSDOH (Mr. Richard Fedigan)

File on eDOCs?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Site Name	PAFB			
Site #	_____			
County	_____			
Town	_____			
Foitable	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Please Write The eDOC File Name Description	FOST A2.17			



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY



December 23, 2003

MEMORANDUM FOR USEPA, REGION 2
ATTN: MR. ROBERT MORSE
Federal Facilities Section
290 Broadway, 18th Floor
New York NY 10007-1866

FROM: AFRPA/DA Plattsburgh
304 New York Road
Plattsburgh NY 12903

SUBJECT: Environmental Documents for Proposed Transfer of Parcel A2.17, Florida Avenue,
Former Plattsburgh AFB NY

Submitted for your review and comments are the Draft Final Supplemental
Environmental Baseline Survey (SEBS) and the Finding of Suitability to Transfer (FOST) for the
subject proposal.

Request any comments to the attached documents by January 7, 2004.

Our point of contact is Steve Gagnier at (518) 563-2871, extension 14.

MICHAEL D. SOREL, PE

Site Manager/BRAC Environmental Coordinator

Attachments:

1. SEBS - Parcel A2.17 (3 cys)
2. FOST - Parcel A2.17 (3 cys)

cc:

NYSDEC (Mr. James Lister) (Atch under sep cover)
AFRPA/DA-EV (Mr. James Waldron)

**DRAFT FINAL SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS)
FOR
PARCEL A2.17
FLORIDA AVENUE
Former Plattsburgh Air Force Base, New York
December 2003**

CHAPTER 1: PURPOSE OF THE SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY

1.1 Introduction. This Supplemental Environmental Baseline Survey (SEBS) has been prepared to document environmental conditions of two buildings and approximately 5 acres of land contained in Parcel A2.17 of Plattsburgh Air Force Base (AFB) since publication of the Plattsburgh AFB Basewide Environmental Baseline Survey (EBS).

1.2 Description. The area included in this document is comprised of two Plattsburgh Airbase Redevelopment Corporation (PARC) subdivision lots (#36 and #38) located west of Arizona Avenue, north of Nose Dock 8 (Building 2890), and east of the Aircraft Parking Apron. The parcel contains one building (Building 2884), paved parking areas, grassed lawn, and is approximately 2.962 acres in size. This area was previously used by the Air Force as a squadron operations administrative facility. Detailed historical use of this area can be found in Table B-1, page 8, of the Basewide EBS.

Building 2884 was originally a 6,376 square foot, concrete block, single-story administrative building constructed in 1957. For the past several years, the building has been subleased to NUARMS, Inc., and has been extensively renovated by PARC. The building and the area included in this parcel are shown on Attachments 1A through 1C.

CHAPTER 2: SURVEY METHODOLOGY

2.1 Approach and Rationale. The data used in preparing this SEBS were obtained from the Plattsburgh AFB Basewide EBS revised May 1997 (data updated to September 1996). The EBS was based on record searches, interviews, and visual site inspections (VSIs). The data and information contained in the EBS were prepared in accordance with Department of Defense policies and guidance, as they pertain to the procedures for conducting an EBS. VSIs were conducted and additional data collected.

2.2 Description of Documents Reviewed. A list of documentation reviewed is provided in the Plattsburgh AFB Basewide EBS. Additional documentation used included the May 1997 Base Realignment and Closure Cleanup Plan (BCP); the November 1995 Final Environmental Impact Statement (FEIS) for Disposal and Reuse of Plattsburgh AFB prepared by Tetra Tech, Inc.; the February 1994 Habitat Assessment and Wetlands Delineation Report performed by URS

Consultants; June 2001 Final Report on the Supplemental Evaluation to the Environmental Baseline Survey prepared by URS Consultants; the February 2003 Draft Final Proposed Plan for IRP Site SS-016 prepared by URS Consultants; the September 2001 Final Closure Report for Removal Actions at the Washrack (Area 2891) and Building 2890 (Nose Dock 8) prepared by OHM Remediation; The April 2003 Analytical Results of Groundwater Sampling, Geoprobe Sampling and Drain Line Confirmation Sampling at the Washrack Area prepared by Versar, Inc.; the May 2003 Interim Record of Decision for FT-002 prepared by URS Consultants; and the November 1997 Final Finding of Suitability to Lease (FOSL) for the Northern Aviation Support Facilities.

All documentation used for the preparation of this SEBS is available for review at the Air Force Real Property Agency office at Plattsburgh, New York.

2.3 Inspection of Properties Conducted. Additional VSIs were conducted in August 2003 to determine if any change in property condition had occurred subsequent to publication of the Basewide EBS. The purpose of these VSIs was to identify any stained soils, stressed vegetation, leachate seepage, unusual odors, condition of asbestos-containing materials (ACM), paint condition, etc., which might indicate environmental concern.

CHAPTER 3: FINDINGS FOR FLORIDA AVENUE, PARCEL A2.17

3.1 Environmental Setting. A description of the area's climate, topography, hydrology, and geology is contained in Section 3.1 of the Plattsburgh AFB Basewide EBS.

3.2 Property Categorization Factors. There are no environmental factors which are directly applicable to this property. No hazardous materials or wastes were stored in Building 2884. No spills or releases are recorded to have occurred. There are no IRP sites or areas of concern on the parcel. No storage tanks or oil/water separators were located on the property. Information on adjacent IRP sites can be found in the Basewide EBS, Appendix D, and in the Finding of Suitability to Transfer for this parcel.

3.3 Disclosure Factors. All disclosure factors are adequately described in the Basewide EBS and do not pose concerns to this property. However, additional discussion of asbestos and lead-based paint is presented below:

3.3.1 Asbestos. A Basewide Asbestos Survey has been completed and is summarized in Tables H-1a/b of the Basewide EBS. Building 2884 originally contained ACM in the floor tile/linoleum/mastic/transite/thermal insulation, but this was abated by PARC during renovations. However, the VSI could not confirm that 100 percent of the original ACM had been abated, and there is the possibility that some may still exist.

3.3.2 Lead-Based Paint (LBP), Other Facilities. A Lead-Based Paint (LBP) Survey has not been performed for Building 2884, which was constructed prior to the DoD ban on the use of

lead-based paint in 1978 and is likely to contain, or be coated with, one or more coats of such paint. The VSI noted the painted surfaces to be in good condition since the surfaces were repainted by PARC during the renovation. However, it is possible that original LBP still exists under the repainted surfaces.

3.4 Other Factors/Resources. Other factors or resources which could impact or be impacted, but are not present or have no environmental impacts include air conformity/permits, energy (utilities), flood plains, hazardous waste management, historic property, Occupational Safety and Health Administration issues, outdoor air quality, prime/unique farmlands, sensitive habitat, septic tanks (wastewater), solid waste, threatened and endangered species, transportation, and wetlands. Sanitary sewer systems (wastewater) may be impacted however, as Building 2884 is connected to a sanitary sewer system which discharges into the City of Plattsburgh treatment facility.

CHAPTER 4: PROPERTY TRANSFER CATEGORY

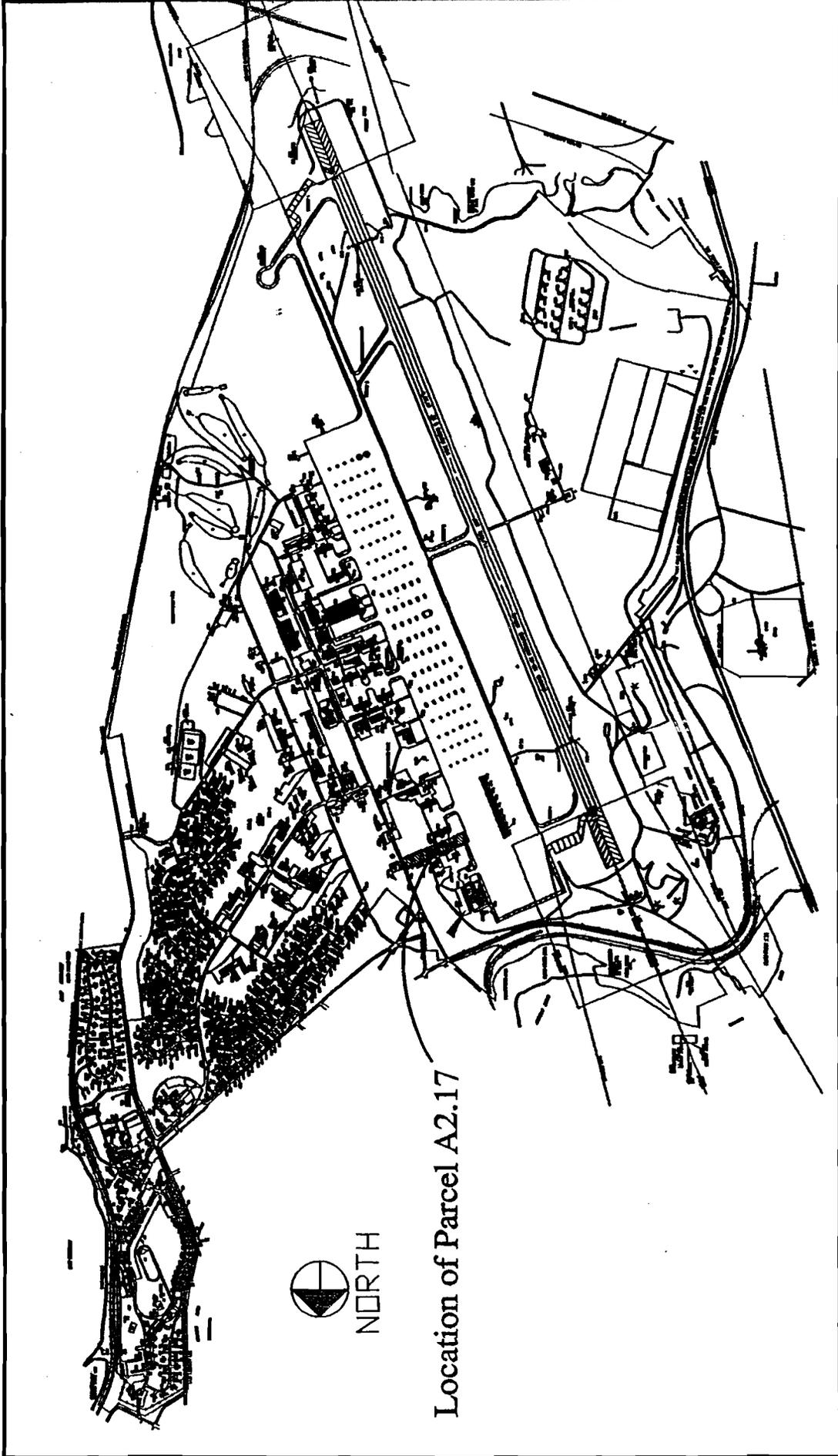
Based on a review of the Basewide EBS and a VSI of the property, the building and lands are considered Department of Defense Environmental Condition Categories (ECC) 1. Category 1 areas are those areas where no release or disposal of petroleum products or hazardous substances has occurred.

CHAPTER 5: CERTIFICATION

I certify that the property conditions stated in this report are based on a thorough review of available records, visual inspections, and sampling and analysis as noted and are true and correct to the best of my knowledge and belief.

MICHAEL D. SOREL, PE
BRAC Environmental Coordinator
AFRPA/DA Plattsburgh

Date



Location of Parcel A2.17

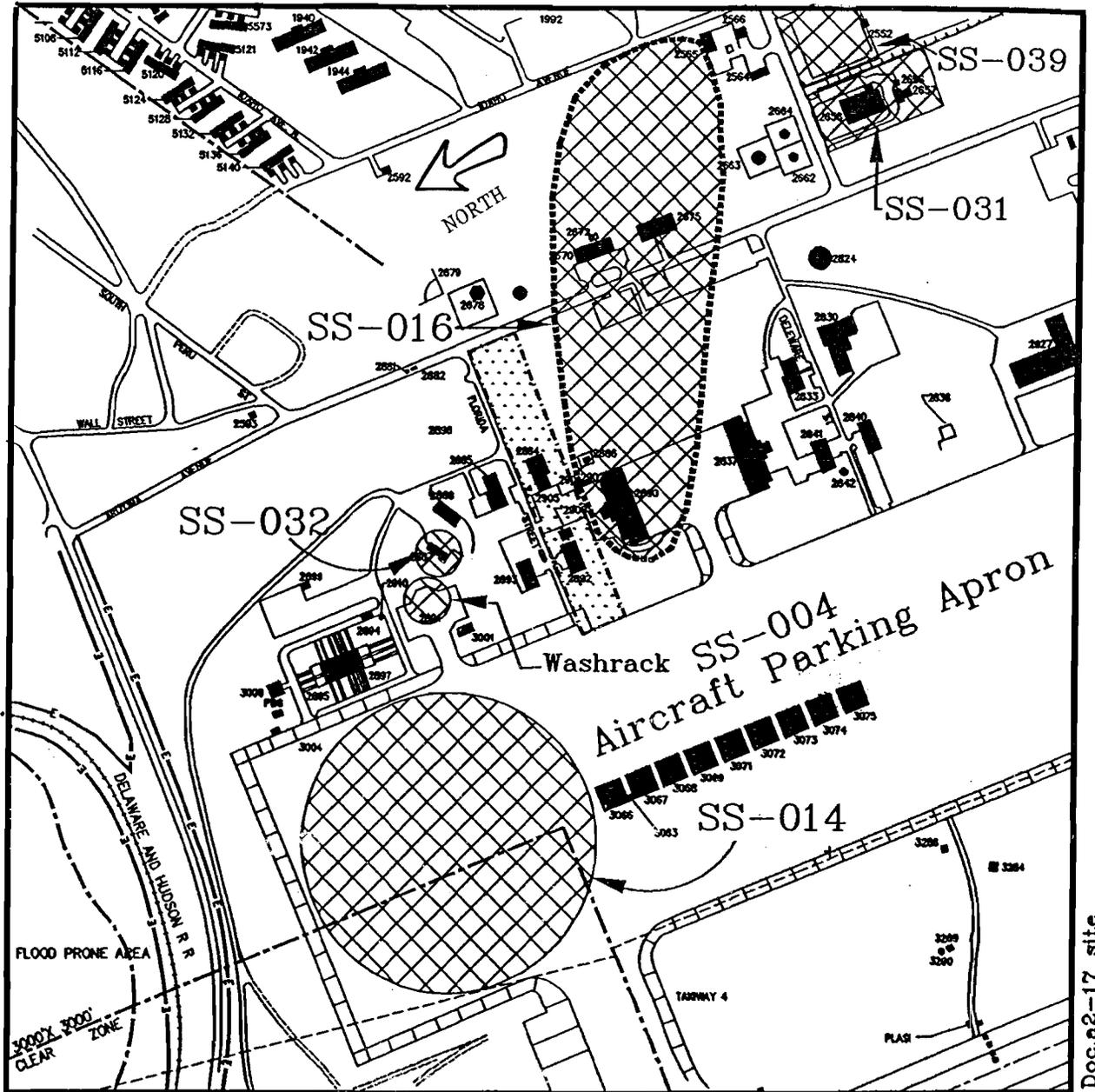


Location of Parcel A2.17

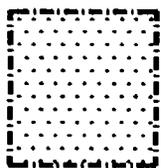
Florida Street Area

Scale: 1" = 2800'

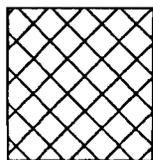
Plattsburgh AFB, NY



Doc.a2-17 site



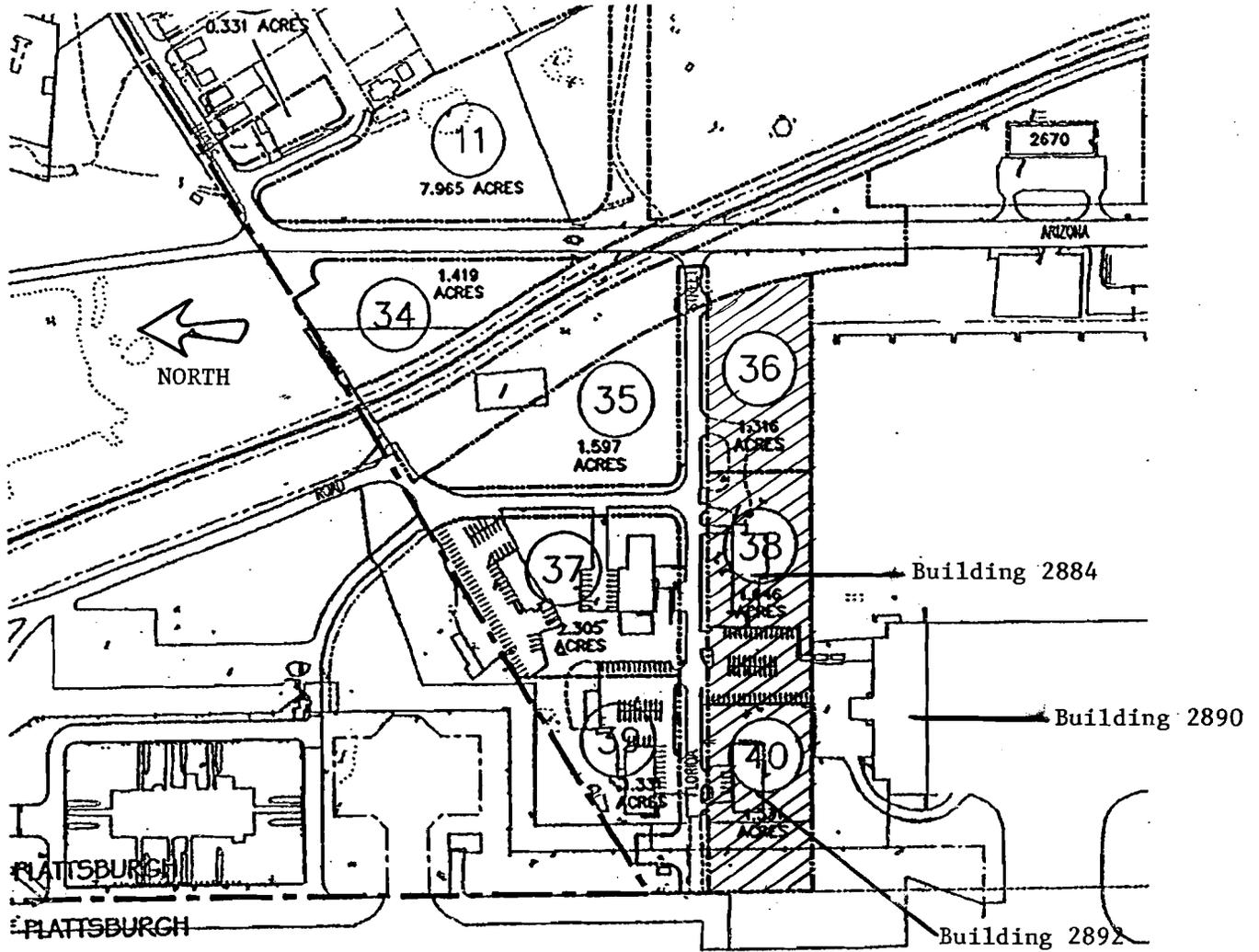
Area of Parcel A2.17, Florida Street
(Former Use: Aircraft Maint. Support)
(Area=5 Acres)



IRP Sites and Areas of Concern

Scale: 1"=550'

Parcel A2.17, Florida St. Area Plattsburgh AFB, NY



PARCEL A2.17

FLORIDA STREET AREA

Location of PARC Subdivision Lots #36, #38, and #40

Scale: 1 inch = 300 feet

DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER (FOST)
PARCEL A2.17
FLORIDA AVENUE
Plattsburgh Air Force Base, New York
December 2003

1. PURPOSE

1.1 The purpose of this Finding of Suitability to Transfer (FOST) is to document environmentally related findings and the suitability to transfer for the proposed deed of real property and any improvements at Plattsburgh Air Force Base (AFB), New York, to the Plattsburgh Airbase Redevelopment Corporation (PARC). The property is described in Section 2 below. The property will be transferred through the County of Clinton Industrial Development Agency (CCIDA) to PARC via an Economic Development Conveyance (signed on March 9, 2001) in accordance with Title XXIX of the National Defense Authorization Act for Fiscal Year 1994, Public Law No. 103-160. Its anticipated reuse is commercial/industrial. It is anticipated that this parcel will be purchased by a manufacturing firm, NUARMS, Inc., for use as an industrial area.

1.2 This FOST is a result of a thorough analysis of information contained in the following documents: the May 1997 Base Realignment and Closure Cleanup Plan (BCP); the November 1995 Final Environmental Impact Statement (FEIS) for Disposal and Reuse of Plattsburgh AFB prepared by Tetra Tech, Inc; the February 1994 Habitat Assessment and Wetlands Delineation Report performed by URS Consultants; June 2001 Final Report on the Supplemental Evaluation to the Environmental Baseline Survey prepared by URS Consultants; the February 2003 Draft Final Proposed Plan for IRP Site SS-016 prepared by URS Consultants; the September 2001 Final Closure Report for Removal Actions at the Washrack (Area 2891) and Building 2890 (Nose Dock 8) prepared by OHM Remediation; the April 2003 Analytical Results of Groundwater Sampling, Geoprobe Sampling and Drain Line Confirmation Sampling at the Washrack Area prepared by Versar, Inc.; the May 2003 Interim Record of Decision for FT-002 prepared by URS Consultants; the May 1997 Basewide Environmental Baseline Survey (EBS) for Plattsburgh AFB; the November 1997 Final Finding of Suitability to Lease (FOSL) for the Northern Aviation Support Facilities; and a Visual Site Inspection of the building and parcel conducted in August 2003.

All documentation used for the preparation of this FOST is available for review at the Air Force Real Property Agency office at Plattsburgh, New York.

2. PROPERTY DESCRIPTION

The area included in this document is comprised of two PARC subdivision lots (#36 and #38) located west of Arizona Avenue, north of Nose Dock 8 (Building 2890), and east of the Aircraft Parking Apron. The parcel contains one building (Building 2884), paved parking areas and

Alb. S.

grassed lawn, and is approximately 2.962 acres in size. This area was previously used by the Air Force as a squadron operations administrative facility. Detailed historical use of this area can be found in Table B-1, page 8, of the Basewide EBS.

Building 2884 was originally a 6,376 square-foot, concrete block, single-story administrative building constructed in 1957. For the past several years, the building has been subleased to NUARMS, Inc., for injection molding of plastics and has been extensively renovated by PARC. The building and the area included in this parcel are shown on Attachments 1A through 1C.

3. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts of this proposal have been adequately analyzed and disclosed in compliance with NEPA. This proposed action complies with the projected land uses for this area as outlined in the Proposed Action of the FEIS.

4. PROPERTY TRANSFER CATEGORY

Based on a review of the Basewide EBS and a VSI of the property, the building and lands are considered Department of Defense Environmental Condition Categories (ECC) 1. Category 1 areas are those areas where no release or disposal of petroleum products or hazardous substances has occurred.

5. DEED RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Section 1.2 were evaluated to identify environmental factors (Atch 2) which may warrant constraints on certain activities in order to minimize substantially or eliminate any threat to human health or the environment. Such constraints typically are embodied as permanent restrictions or as specific notifications to the Transferee. The factors that require either deed restrictions or specific notifications are identified in Atch 2 and are discussed below. Please reference the EBS, SEBS, and other applicable documents for specific information on each resource category.

5.1 Installation Restoration Program (IRP) Sites. There are no IRP sites located within the boundaries of this parcel. However, there are four IRP Sites (FT-002, SS-004, SS-016, SS-032) and one Area of Concern (AOC) (Washrack, 2891) located adjacent to the property to be transferred. These sites are discussed below, and additional information on the IRP sites can be found in Appendix D of the Basewide EBS.

FT-002 is the former Fire Training Area. Investigations indicate that a groundwater plume, containing trichloroethene (TCE) as the major contaminant, originating from FT-002 lies adjacent to this property. The exact extent and boundaries of this plume have been investigated under a Remedial Investigation/Feasibility Study (RI/FS) are shown on Attachment 1B. An Interim Record of Decision has been issued for this site, and remedial actions are currently under construction.

SS-004 is the Flightline and Industrial Area. The area has potential contamination from fuel spills that occurred during aircraft refueling/defueling and fuel expansion in aircraft fuel tanks on the flightline ramp. Solvent spills have occurred in the industrial area along the flightline ramp. In addition, a portion of the contaminated groundwater plume from FT-002 may underlie portions of this site. The Revised Draft Final RI, which recommends continued monitoring for fuel spills associated with the refueling system, is currently under regulatory review.

SS-016 is Nose Dock 8, Building 2890. This facility was used for aircraft corrosion control and painting. It contained a 1,956-gallon underground storage tank (UST) for the storage of spent solvents and waste strippers. This tank ruptured in 1987 with the release of 1,400 gallons of its contents. A groundwater plume extends approximately 1,400 LF downgradient to the southeast, as shown on Attachment 1B. Contaminants of concern include 2-butanone, methylene chloride, toluene, xylenes, ethylbenzene, trichloroethene, and acetone. Source removal has been accomplished, and a groundwater treatment system has been in operation since 1997. These measures have reduced the extent of groundwater concern to an area less than 250 feet downgradient of Building 2890. A Supplemental Evaluation/Feasibility Study was issued in March 2001, which recommends the use of an oxygen releasing compound (ORC) to address remaining contamination. A Draft Final Proposed Plan is currently under regulatory review.

SS-032 is an Industrial Waste Treatment and Disposal Facility (Building 2887). The treatment facility included a 30,000-gallon UST under the building which collected wastes from Nose Dock 8 (see IRP Site SS-016 above) and an aircraft washrack (Facility 2891) and discharged them into the sanitary sewer. A preliminary assessment (PA) was conducted in 1992, and the UST was closed in-place (filled with concrete). Regulatory concurrence has been received.

The Washrack AOC was a paved area adjacent to the parking ramp. Equipment and piping removals occurred in October and November of 1999, and a Closure Report was issued in September 2001. Additional piping removals, sampling of soil and groundwater, and installation of three monitoring wells were performed in late 2002/early 2003. Geoprobe sampling indicated minor exceedences of BTEX compounds in the soil and groundwater, but no plume was indicated or delineated. Groundwater flow is generally easterly, but downgradient wells show no exceedences of the contaminants of concern. This monitoring is being conducted on a semiannual basis to assure no contaminants are moving towards an off-base residential area (Kemp Lane). These confirmatory sampling results are currently under regulatory review.

The Air Force has evaluated the risks associated with these sites and has determined that the property can be transferred, with the specified deed restrictions identified in this FOST, with acceptable risk to human health or the environment and without interference with the environmental restoration process.

A covenant will be included in the deed to ensure that all remedial actions necessary to protect human health and the environment with respect to hazardous substances on the property have been taken before the date of the transfer, and that any additional response or corrective

actions that are the responsibility of the Air Force found to be necessary after the date of delivery of the deed will be conducted by the United States.

5.2 Asbestos. A Basewide Asbestos Survey has been completed and is summarized in Tables H-1a/b of the Basewide EBS. Building 2884 originally contained ACM in the floor tile/linoleum/mastic/transite/thermal insulation, but this was abated by PARC during renovations. However, notice will be provided in the deed that the Transferee will be responsible for complying with all applicable federal, state, and local laws relating to asbestos, in the instance that additional original ACM be discovered at a later date.

5.3 Lead-Based Paint (LBP), Other Facilities. A Lead-Based Paint (LBP) Survey has not been performed for Building 2884, which was constructed prior to the DoD ban on the use of lead-based paint in 1978 and is likely to contain, or be coated with, one or more coats of such paint. The VSI noted the painted surfaces to be in good condition since the surfaces were repainted by PARC during the renovation.

The Transferee will be notified of the possible presence and existing condition of the LBP in this facility. Notice will be provided that the Transferee will be responsible for managing all LBP and potential LBP in compliance with all applicable laws and regulations.

5.4 Sanitary Sewer System (Wastewater). Building 2884 is connected to a sanitary sewer system which discharges into the City of Plattsburgh treatment facility.

The Transferee will be responsible for submitting any required applications for discharging wastewater into the sanitary sewer system and for meeting all applicable wastewater discharge permit standards.

6. REGULATOR COORDINATION

The New York State Department of Environmental conservation (NYSDEC) and the United States Environmental Protection Agency (USEPA) were notified during the BRAC Cleanup Team (BCT) meeting on July 22, 2003, of the initiation of the FOST and SEBS and were invited to participate in preparing the working draft documents. Consolidated draft documents were provided on September 12, 2003, for their formal review and comment. NYSDEC/NYSDOH and USEPA comments were received on October 22 and November 3, 2003, respectively. Consolidated Draft Final documents were provided on December 23, 2003, for their formal review and comment.

7. FINDING OF SUITABILITY TO TRANSFER

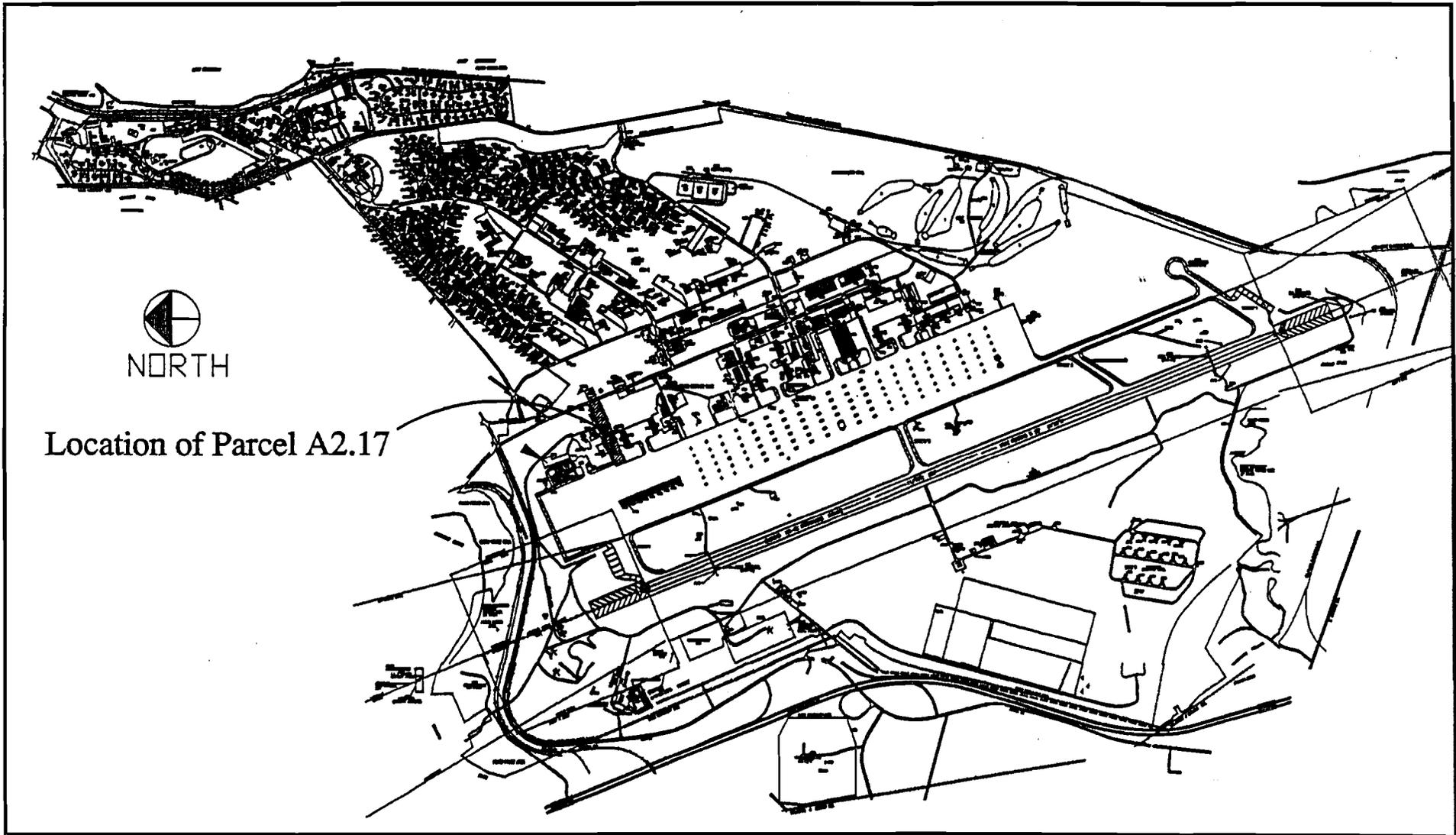
The deed proposal has been adequately assessed and evaluated for (a) environmental hazards, (b) environmental impacts anticipated from future use of the property, and (c) adequate notice of disclosure resources. The future use of this property does not present a current or future risk to human health or the environment, subject to inclusion and compliance with the appropriate deed covenants as addressed above. The property, therefore, is suitable for transfer.

Date

ALBERT F. LOWAS, JR.
Director
Air Force Real Property Agency

Attachments:

1. Property Map(s)
2. Environmental Factors Considered
3. Regulator Comments
4. Air Force Response to Regulator Comments



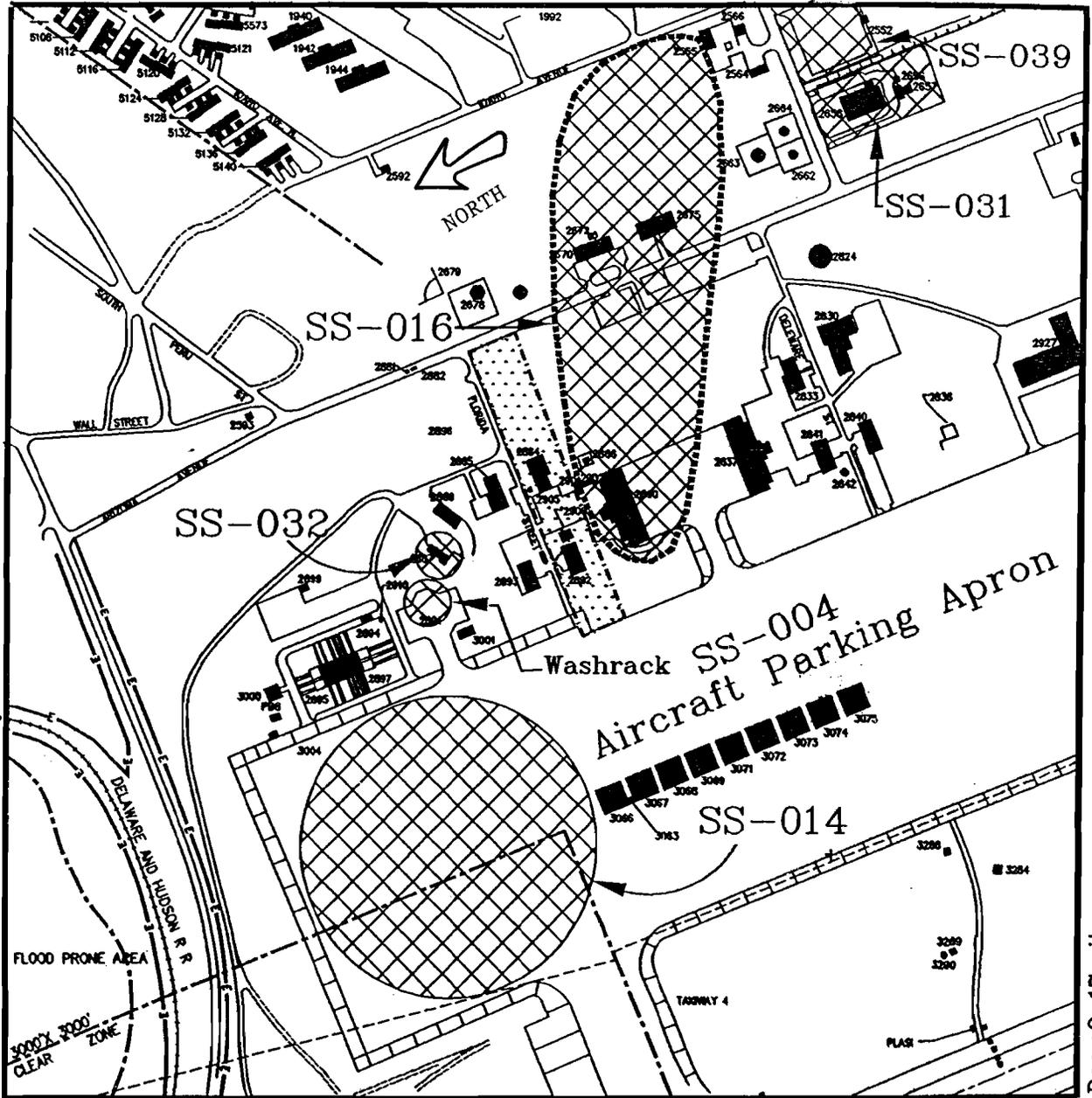
Location of Parcel A2.17 Florida Street Area

Scale: 1" = 2800'

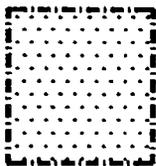
Plattsburgh AFB, NY

Attachment 1A

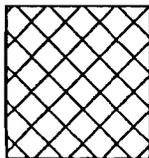
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Doc.a2-17 site



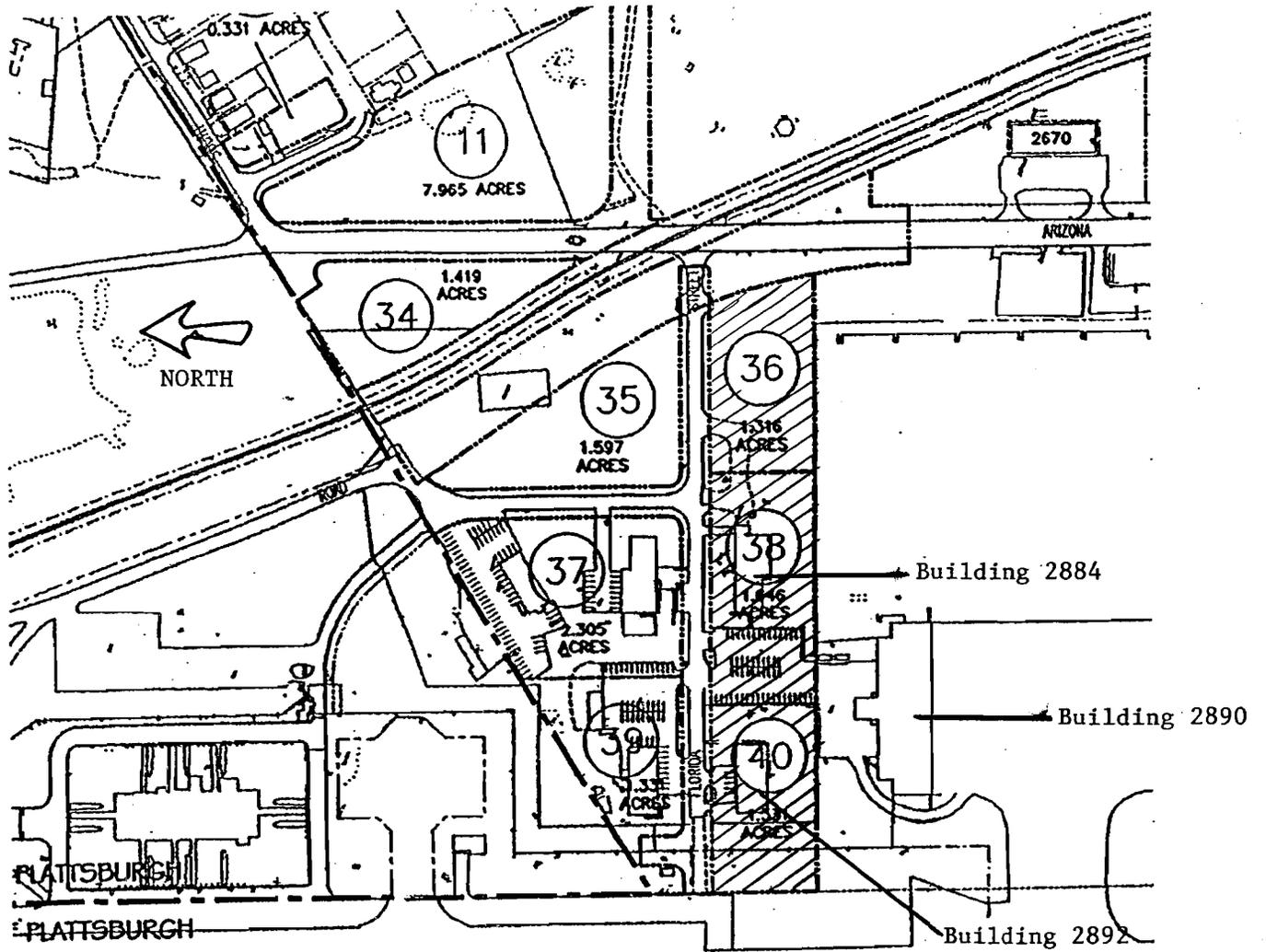
Area of Parcel A2.17, Florida Street
(Former Use: Aircraft Maint. Support)
(Area=5 Acres)



IRP Sites and Areas of Concern

Scale: 1"=550'

Parcel A2.17, Florida St. Area Plattsburgh AFB, NY



PARCEL A2.17
 FLORIDA STREET AREA
 Location of PARC Subdivision Lots #36, #38, and #40

Scale: 1 inch = 300 feet

**FLORIDA AVENUE
Parcel A2.17**

Lease Restriction or Notification Required?		<i>Environmental Factors Considered</i>
No	Yes	
		<i>Environmental Restoration, Hazardous Substances, Petroleum</i>
X		Hazardous Substances (Notification)
X		Spills and Releases
	X	Installation Restoration Program (IRP) and Areas of Concern
X		Medical/Biohazardous Wastes
X		Oil/Water Separators (OWSs)
X		Unexploded Ordnance
X		Radioactive & Mixed Wastes
X		Storage Tanks (USTs/ASTs)
		<i>Disclosure Factors/Resources:</i>
	X	Asbestos
X		Drinking Water Quality
X		Indoor Air Quality
X		Lead-Based Paint (High-Priority Facilities)
	X	Lead-Based Paint (Other Facilities)
X		PCBs
X		Radon
		<i>Other Factors:</i>
X		Air Conformity/Air Permits
X		Energy (Utilities)
X		Flood Plains
X		Hazardous Waste Management (By Lessee)
X		Historic Property (Archeological/Native American, Paleontological)
X		OSHA (Occupational Safety & Health Administration)
X		Outdoor Air Quality
X		Prime/Unique Farmlands
	X	Sanitary Sewer Systems (Wastewater)
X		Sensitive Habitat
X		Septic Tanks (Wastewater)
X		Solid Waste
X		Threatened and Endangered Species
X		Transportation
X		Wetlands

To: Stephen Gag: er@PLATTSBURGH@AFBDA.OL3
From: <Morse.Bob@epamail.epa.gov>
Cc: ISMTP@ADMIN@AFBDA.HDQ["James Lister"
<jblister@gw.dec.state.ny.us>], Michael
Sorel@PLATTSBURGH@AFBDA.OL3
Subject: SS-016 Boundary and Parcel A2.17 FOST
Attachment:
Date: 7/24/2003 1:52 PM

Steve,

We have reviewed your fax of July 22, 2003 in which you sent 2 pages, plus a cover sheet regarding the above matter. The pages you attached were as follows::

- 1) Parcel / property map showing lots 36 and 38 on Florida St. (which you stated make up Parcel A2.17); and
- 2) Figure 8 from the SS-016 draft final Proposed Plan, showing the location of SS-016 "Institutional Restrictions".

As per your fax cover sheet, I also referred to Figure 7 of the SS-016 draft final Proposed Plan, which shows contaminant detections in groundwater, circa 2000, as well as something referred to as "Site Boundary / Extent of Site SS-016 Diffuse Groundwater Plume." Based on these figures, lots 36 and 38 appear to be a sufficient distance from the SS-016 Site Boundary and groundwater plume (Figure 7) and the SS-016 Institutional Restrictions area (Figure 8) to allow for AFRPA to proceed with the development of a FOST for Parcel A2.17 as requested by PARC. Please call or email if you have any questions or if you need anything further.

Bob

ATTACHMENT 3A

To: Stephen Gagner@PLATTSBURGH@AFBDA.OL3
From: "James Lister" <jblister@gw.dec.state.ny.us>
Cc: ISMTP@ADMIN@AFBDA.HDQ [<Morse.Bob@epamail.epa.gov>]
Subject: Parcel A2.17 property lines
Attachment:
Date: 7/24/2003 3:03 PM

Steve, I've reviewed the two maps you faxed us regarding the location of property lines of lots 36 and 38 (Parcel A2.17) with respect to the Site

SS-016 groundwater contamination, as depicted by your consultant. Based on these submittals we do not find any groundwater contamination issues from SS-016 impacting Parcel A2.17. Jim

ATTACHMENT 3B

To: Dave Farnsworth@PLATTSBURGH@AFBDA.OL3
From: Michael Sorel@PLATTSBURGH@AFBDA.OL3
Originated by: "James Lister" <jblister@gw.dec.state.ny.us>
Cc:
Subject: Fwd: SEBS And FOST Parcel A2.17, Florida Ave.
Attachment: attach1,BEYOND.RTF
Date: 10/22/2003 6:11 AM

From: "James Lister" <jblister@gw.dec.state.ny.us>, on 10/21/2003 3:32 PM:
To: Michael Sorel@PLATTSBURGH@AFBDA.OL3
Cc:
ISMTP@ADMIN@AFBDA.HDQ[<MORSE.BOB@epamail.epa.gov>],ISMTP@ADMIN@AFBDA.HDQ[<rjf01@health.state.ny.us>]

Mike, as we discussed this is just provided as advisement if something does show up in the future in the groundwater under Parcel A2.17. Jim

I have reviewed these documents . Future investigation of IRP sites in this area, particularly the wash rack AOC, may determine that contamination exists beneath parcel A2.17. If contamination is identified there may be a need to evaluate/remediate indoor air quality at these buildings, the Air Force should be made aware of this.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

Via Facsimile 11/03/03

Mr. Michael D. Sorel, P.E.
Site Manager / BRAC Environmental Coordinator
AFRPA/DA
304 New York Rd
Plattsburgh, New York 12903

Re: Draft Supplemental Environmental Baseline Survey (SEBS) and Finding Of Suitability To Transfer (FOST) for Parcel A2.17 (Florida Avenue)

Dear Mr. Sorel:

EPA has reviewed the Draft Supplemental Environmental Baseline Survey (SEBS) and Finding Of Suitability To Transfer (FOST) for Parcel A2.17 (Florida Avenue). EPA comments are presented below.

Supplemental Environmental Baseline Survey (SEBS)

Page 1, section 1.1: This section states that the parcel contains one building and encompasses 2.962 acres of land, whereas all other sections of the SEBS and FOST state that there are 2 buildings and that the parcel consists of approximately 5 acres. This discrepancy needs to be corrected.

Page 3, Chapter 4, Property Transfer Category: EPA will not comment on the listed property categories as such categories are largely for DoD use. (See also Section 4 of the FOST, page 2).

Attachment 1B: A north arrow was not found on this figure, and needs to be included on it. (See also Attachment 1B of the FOST).

Finding Of Suitability To Transfer (FOST)

Page 1, sec 1.1: It is not clear whether the EDC referred to in this section of the FOST is the EDC that has already been accomplished for a large portion of the base or is a new, separate EDC. It is EPA's understanding that an EDC was already accomplished through a 55 year lease in furtherance of conveyance. Clarification is requested. Regardless, the date of the signed EDC should be given.

Page 2, sec 2, last paragraph: The text needs to state what NUARMS, Inc. used / is currently using

the building for.

Page 2, sec 3: FEIS needs to be identified.

Page 2, sec 5: Change "of" to "or" in the 3rd line (human health or the environment).

Page 3, SS-016 and the Washrack AOC: The descriptions of this IRP Site and AOC need to be expanded to include more specific information regarding potential groundwater contamination, e.g., what contaminant(s), if any, is/are present, their concentrations, the existence of plume(s), if present, plume location, and groundwater flow direction, etc.

Attachment 2, Environmental Factors: Drinking Water Quality is not checked. Are stagnation issues still present?

- END OF COMMENTS -

Please note that copies of the signed SEBS and FOST must be given to all transferees prior to execution of the deed(s). The public must be notified, within 14 days of the signing of the FOST, of the existence of the FOST, and copies of both the SEBS and FOST must be placed in the Administrative Record for Plattsburgh AFB. The signed FOST must include any unresolved regulator comments.

Also, please note that EPA review of the above-referenced documents was performed without any independent investigation or verification of the information contained therein. EPA reserves all rights and authorities relating to information not contained in these documents whether or not such information was known when the SEBS was issued or is discovered after such issuance. Note also that EPA is not in receipt of all of the documents referenced in the SEBS and FOST. Last, without a legal description of the property, EPA cannot be responsible for providing an endorsement of the property as a whole.

If you have any questions regarding this letter, please feel free to call me at (212) 637-4331.

Sincerely,



Robert D. Morse
Remedial Project Manager

cc: J. Lister, NYSDEC

**PLATTSBURGH AIR FORCE BASE
FINDING OF SUITABILITY TO TRANSFER (FOST)
PARCEL A2.17, FLORIDA AVENUE**

AFRPA RESPONSE TO REGULATORY COMMENTS

1. On July 22, 2003, the AFRPA provided maps and figures to the New York State Department of Environmental Conservation (NYSDEC) and United States Environmental Protection Agency (USEPA) and requested regulatory review of the proposed site and institutional control boundaries for Site SS-016. Concurrence with these proposed boundaries would allow AFRPA to proceed with this FOST. Regulatory concurrence was received from both agencies on July 24, 2003. (Refer to Attachments 3A and 3B of this FOST.)

2. The NYSDEC and USEPA submitted comments (See Attachments 3C and 3D of this FOST.) in response to the September 2003 Draft FOST and Draft Supplemental Environmental Baseline Survey (SEBS). Regulatory comments are addressed as follows:

a. NYSDEC e-mail of 10/22/2003 forwarding a comment concerning possible future groundwater contamination in the vicinity of the Washrack AOC: Comment is noted. The report detailing the recently concluded geoprobe and monitoring well sampling at this area is being prepared and will be forwarded for regulatory review. The report will contain recommendations for addressing the residual BTEX contamination in this area. Any further actions in this area will be undertaken as required after consultation with, and comments from, the regulatory agencies.

b. USEPA Comment #1, SEBS, Section 1.1: This paragraph has been modified to correct the noted discrepancy.

c. USEPA Comment #2, SEBS, Chapter 4: Comment noted.

d. USEPA Comment #3, SEBS and FOST, Attachment 1B: A "North Arrow" has been added.

e. USEPA Comment #4, FOST, Section 1.1: The EDC referred to in the document is the initial, original EDC signed on March 9, 2001. The date of signature has been added to the document.

f. USEPA Comment #5, FOST, Section 2: NUARMS, Inc., is a plastic injection molding firm that produces parts and components for other companies. This information has been added to the document.

g. USEPA Comment #6, FOST, Section 3: The "FEIS" has been identified in paragraph 1.2 of the FOST (as well as paragraph 2.2 of the SEBS).

- h. USEPA Comment #7, FOST, Section 5: The requested change has been made.
- i. USEPA Comment #8, FOST, page 3: The requested information has been added to the SS-016 and Washrack AOC discussions.
- j. USEPA Comment #9, FOST, Attachment 2: Water stagnation problems are no longer a problem due to increased reuse activity, although PARC will test water on a “by request” basis.