



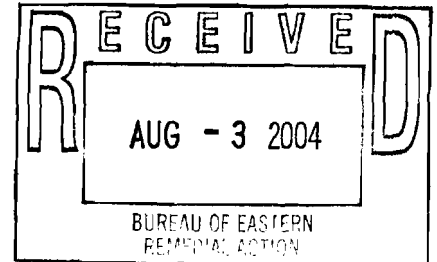
DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY



August 2, 2004

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

AFRPA/DA Plattsburgh
304 New York Road
Plattsburgh NY 12903



SUBJECT: Completed/Signed FOST and SEBS - Parcels A2.15 and K-2

Attached are copies of recently signed FOSTs and SEBSs and the public notices.

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

Attachments:

1. FOST/SEBS/Public Notice - Parcel A2.15, Northwest and Southwest Base Areas
2. FOST/SEBS/Public Notice - Parcel K-2, Lakefront Area

cc:

USEPA (Mr. Robert Morse) (Atch under sep cover)



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY



August 2, 2004

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

AFRPA/DA Plattsburgh
304 New York Road
Plattsburgh NY 12903

SUBJECT: Completed/Signed FOST and SEBS - Parcels A2.15 and K-2

Attached are copies of recently signed FOSTs and SEBSs and the public notices.

MICHAEL D. SOREL, PE
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1. FOST/SEBS/Public Notice - Parcel A2.15, Northwest and Southwest Base Areas
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cc:

NYSDEC (Mr. James Lister) (Atch under sep cover)

FINAL FINDING OF SUITABILITY TO TRANSFER (FOST)
PARCEL A2.15
NORTHWEST AND SOUTHWEST BASE AREAS
Plattsburgh Air Force Base, New York
March 2004

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 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, and aviation support. It is anticipated that one portion of this parcel will be redeveloped by a retail distribution firm for construction of a shipping/receiving warehouse.

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 Environmental Impact Statement (EIS) for Disposal and Reuse of Plattsburgh AFB prepared by Tetra Tech, Inc.; the April 1997 Closure Report for the Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks, and Aboveground Storage Tanks prepared by OHM Remediation Services Corporation; the March 1999 Site Characterization Report prepared by Fanning, Phillips, and Molnar; 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 May 1999 Final Ordnance and Explosives Removal Action Report prepared by Human Factors Applications (HFA) Inc; the September 2002 Post-Investigative Report for the EOD Range (IRP Site SS-026) prepared by Versar, Inc; Semiannual Post-Closure Monitoring Reports for Landfill LF-024 prepared by URS Consultants; the Final Record of Decision (March 2003) for IRP Site SS-026 prepared by URS Consultants; the Final Record of Decision (March 1997) for IRP Site LF-024 prepared by URS Consultants; and the Final Closure Report (January 2003) for the Excavation of Solid Waste Debris Landfills C & D (OTH 3505-1) and Stump Dump (OTH 3505-2) prepared by Versar, Inc. 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 four non-contiguous areas located to the north, west, and south of the runway and flightline. The parcel contains 2 buildings, 2 support structures, and vacant open land, and is a total of approximately 285.2 acres in size. The buildings, structures, and land areas associated with this property are listed in Table 2.1 below, together with their sizes and construction dates, where applicable. This entire area was

previously used by the Air Force for navigational aids, landfills, training, and to provide a buffer zone for the flightline. Detailed historical land use for these areas can be found on pages 9, 10, and 11 of Table B-1 of the Basewide EBS. The four areas included in this parcel are shown on Attachments 1A through 1D and contain the following acreages: Area 1, .9 acres; Area 2, 14.7 acres; Area 3, 263.8 acres; and Area 4, 5.8 acres.

Table 2.1, Existing Facility Information

Facility Number	Category	Usage	Size or Quantity	Year Constructed
3510	A	EOD Range	1 EA	1975
3512	A	Training Area (Mobility/ Outdoor Survival Skills)	1 EA	1987
3513	A	Practice Grenade Range	1 EA	1979
9400	B	TACAN Station	343 SF	1957
9700	B	Beacon Light	342 SF	1957
9701	S	Antenna Spt Stru	1 EA	1980
9710	S	Laser Beam Ceilometer	1 EA	1959

Abbreviations Key: B - Building/S - Structure/A - Acreage

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 Final Environmental Impact Statement (FEIS).

4. PROPERTY TRANSFER CATEGORY

Based on a review of the Basewide EBS and a VSI of the property, the buildings and structures are considered Department of Defense Environmental condition Categories (ECC) 1 or 4, as indicated in Table 4 below. Category 1 areas are those areas where no release or disposal of petroleum products or hazardous substances has occurred. Category 4 areas are those areas where release, disposal, and/or migration of hazardous substances have occurred, and the required remedial actions have been taken. Changes in the condition category of these facilities, since publication of the Basewide EBS, are also presented in Table 4.1 below.

Table 4.1, Property Transfer Category

Location	Old ECC	New ECC	Comments
3510	7	4	NFA ROD for SS-026 complete.
3512	2	1	Petroleum storage; no release.
3513	7	1	No release, disposal, or migration.
9400/9700	2	1	Petroleum storage only; no release.
9701	1	1	No environmental concerns associated with this structure.
9710	1	1	No environmental concerns associated with this structure.
LF-024	-	4	ROD for LF-024 complete.

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 Hazardous Substances Notification. No hazardous substances are known to have been stored on this property. However, hazardous substances are known to have been used, and disposed of, on this property in association with IRP Sites LF-024 and SS-026. These sites are discussed below.

A hazardous substance release notice (Atch 3) will be given in the transfer documents of the type and quantity of hazardous substances associated with this property and the dates the usage and disposal took place.

5.2 Installation Restoration Program (IRP) Sites. There are two IRP sites (LF-024 and SS-026) located within the boundaries of this parcel. Also, there are three IRP sites (FT-002, SS-013, and LF-023) which are located immediately adjacent to the parcel to be transferred. These sites are discussed below, and additional information 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 Attachments 1B through 1D. In addition, an outfall exists south of FT-002 into which contaminated storm water effluent collects. An Interim Record of Decision (June 2003) has been issued for this site, and remedial actions are currently under construction.

SS-013 is the former Munitions Maintenance Squadron (MMS) area and is shown on Atch 1D. A Remedial Investigation (RI) that was started in 1993/1994 investigated five possible source areas and recommended additional investigation and removals at three locations: an underground storage tank (UST-3578), a septic tank (SPT-3578), and a former waste accumulation area (STW/STM-3578). Removals have been completed at all three locations. A supplemental RI has been completed and additional documentation, which recommends ozone sparging to address residual contamination, is currently under regulatory review. In addition, an investigation is currently ongoing in the vicinity of Building 3578 to determine if any radiological waste cleaning materials were buried in the area. Additional discussion of this investigation can be found in Section 5.4 below.

LF-023 is a former domestic waste landfill located west of the flightline and is shown on Atch 1C. It operated from 1966 to 1981. It was added to the IRP in 1987, and the RI recommended a low permeability barrier cover to control the source. The Source Control ROD was signed in 1992, and the cap/barrier system was installed in 1994/1995. A follow-up feasibility study recommended long-term monitoring and the installation of four (4) additional wells for the groundwater operable unit. A ROD was signed in March 1995, and long-term monitoring began in October 1995. Monitoring results thus far have indicated that the cap is proving to be effective, the remedial action objectives are being met, and no areas of noncompliance have been noted.

- **LF-024** is a former construction spoils landfill located southwest of the Weapons Storage Area between the south edge of the Explosive Ordnance Disposal (EOD) area (SS-026) and the Salmon River as shown on Atch 1D. It is approximately 1 acre in size, was operational between 1980 and 1986, and was used for the disposal of concrete, asphalt, wood, and crushed metal drums. During the Site Investigation (SI), there were no organic compounds detected above background levels, but some metals above background levels were detected. A ROD was signed in March 1997, and a native soil cap was installed in 1997/1998. Long-term monitoring began in November 1998 and has been performed semiannually since that time. In accordance with the ROD, monitoring frequency will be done on an annual basis starting in November 2003. Monitoring results have been consistent and have indicated that the cap is effectively preventing contaminant migration. The ROD for LF-024 specified the following institutional controls:

- Restrictions on the development of any structure which would adversely affect human health and safety.

- Restrictions to prevent any actions which would lead to the deterioration of the cap, including the installation of any groundwater wells, for any purpose, within the groundwater use restriction area shown on Attachment 1F.

- Prohibition of any excavation of the cap without prior approval of the NYSDEC.

- Notice is to be provided in the deed documents warning of potential short-term health risks from the inhalation of dust during construction activities.

In addition, documentation will accompany the sale of this parcel which will indicate that the Air Force will continue to monitor and maintain LF-024 as specified in the ROD. The area of groundwater use restrictions is shown on Atch 1F.

– **SS-026** is the former Explosive Ordnance Disposal (EOD) Range located just northeast of LF-024 as shown on Atch 1D. This 8-acre site was used between 1975 and 1991 for demolition of excess ordnance. A Site Investigation (SI) was started in 1994 and only metals were detected at concentrations elevated relative to background. Range safeing (i.e., removal of all ordnance-related materials) was conducted in 1997 and 1998, and several discoveries were made which may have an impact on human health and the environment: buried drums, chemical warfare training materials, and debris/fill areas. These items were all excavated, removed off site, and disposed of using approved procedures. Upon completion of the range safeing, the U.S. Army Corps of Engineers (USACOE) issued a “Statement of Clearance” on July 16, 1999, that recommended that the range can “be used for any purpose for which the land is suited.” Upon completion of this safeing work, the SI was completed, and a small area of PAH-contaminated soil was subsequently delineated, investigated, and removed. A No-Further-Action Record of Decision was issued in March 2003, received NYSDEC concurrence on March 4, 2003, and was co-signed by the USEPA on June 20, 2003. As required by the ROD, notification of the prior land use as an EOD Range will be included in the site property transfer documents. Transfer records shall detail past ammunition and explosive contamination information. This information will also be entered in the permanent land records of the civil jurisdiction in which the property is located.

The Air Force has evaluated the risks associated with these IRP 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.

With the execution of the deed, incorporating the required restrictions (including monitoring associated with LF-024), all known remedial actions will have been taken. Other 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. Provisions will also be included in the deed to allow the United States access to the property in any case in which any such response or corrective action is found to be necessary, or which such access is necessary to carry out a response or corrective action on adjoining property.

5.3 Unexploded Ordnance. The Basewide EBS (Appendix G, Table G-1) lists several ordnance-related issues associated with buildings, structures, and open land areas on the property. The locations and status of the ordnance-related factors are discussed below:

ORD-3510 and ORD-3513. Facility 3510 was the EOD Range and Facility 3513 was an adjacent 40mm practice grenade range. In 1997/1998, a range safeing contract was performed by the U.S. Army Corps of Engineers (Huntsville, Alabama, Division) to address the issue of unexploded ordnance (UXO) in these two areas. The EOD Range was 100 percent cleared of all ordnance-related items to a depth of 4 feet, and anomalies deeper than 4 feet were excavated and removed. In addition, a 32.5-acre buffer zone surrounding the range was cleared to a depth of 1

foot. The grenade range was 100 percent cleared to a depth of 3 feet and deeper anomalies were searched for but none were found. A 100- to 150-foot buffer zone surrounding the range was also cleared to a depth of 1 foot. A Final Ordnance and Explosives Removal Action Report was issued in May 1999, and the USACOE has provided a "Statement of Clearance" for each of the two ranges. These certificates indicate that these ranges have been given careful search and have been cleared of all dangerous and explosive ordnance reasonably possible to detect and that the ranges can be used for any purpose for which the land is suited. Additional information on the EOD range can be found in the discussion for SS-026 in Section 5.2 above.

A notice will be placed in the deed of the location and duration of usage of these areas described above and of the subsequent removal project action taken by the Air Force. Notice will be provided in the deed documents that there is the potential, however minimal, for the presence of ordnance below the listed depths of 4 feet and 3 feet, since soil below these depths may be excavated during construction activities.

5.4 Radioactive and Mixed Wastes. The Air Force has recently compiled information that indicates certain weapons maintenance activities that occurred in the 1950s and 1960s may have resulted in the generation of waste cleaning materials that contained radioactive contamination of very low levels, and that these materials may have been buried on-site within the Weapons Storage Area. These burial sites, if they exist, would very likely be in the vicinity of Building 3578 and/or the storage bunkers. A field investigation, consisting of electromagnetic (EM), ground penetrating radar (GPR) and radioactive-sensitive instrumentation was conducted from September 29 - October 28, 2003. In addition, soil samples, water samples (groundwater and surface water), and concrete samples were taken. All preliminary indications are that no burial sites exist. The Draft PA/SI Report is currently being prepared and is scheduled for submission to the regulatory agencies in February 2004. The areas included in this investigation are shown on Attachment 1D and are adjacent to the parcels to be deeded.

5.5 Storage Tanks and Petroleum Handling Facilities. There have been several aboveground and/or underground storage tanks (AST/UST) associated with this property. A summary of the storage tanks associated with this property is presented in Table 5.5 below and further information on these tanks can be found in Tables E-1 and E-2 of the Basewide EBS.

Table 5.5, Storage Tanks

Location	Comments
9400	<p>UST-9400. An historical tank not located during the VSIs. No evidence of fill/vent piping noted. No evidence of spills and/or contamination noted.</p> <p>AST-9400-1. A 275-gallon generator supply tank which was removed and replaced by existing tank AST-9400-2. This is a 107-gallon day tank which is located within the generator room. No evidence of spills and/or contamination noted during the VSIs.</p>

9700	AST-9700-1. A 275-gallon generator supply tank which was removed and replaced by existing tank AST 9700-2. This is a 21-gallon internal generator day tank. No evidence of spills and/or contamination noted during the VSIs.
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A notice will be given in the transfer documents and in the SEBS of the location of these storage tanks. The Transferee will be responsible for complying with any applicable federal, state, and local laws relating to the operation, maintenance, and installation of any storage tanks.

5.6 Asbestos. A Basewide Asbestos Survey has been completed and is summarized in Tables H-1a and H-1b of the Basewide EBS.

Buildings and structures which were included in the survey and their status are listed in Table 5.6 below:

Table 5.6, Asbestos-Containing Materials

Location	Comments
9400	Two homogeneous areas were tested and one, cement board shingles, was confirmed to contain ACM. No areas of damaged or deteriorated ACM were noted during the survey or VSI.
9700	One homogeneous area was tested, gypsum, and found to contain no ACM. No additional suspect areas noted during the VSI.

The property to be conveyed contains asbestos-containing material (ACM).

ACM in Structures or Buildings: Based on an inspection of the property and a review of the environmental baseline survey reports, the ACM located in structures on the property is in good condition and not damaged or deteriorated to the extent that it creates a potential source of airborne fibers.

ACM in Utility Pipelines: No CERCLA remedial action for ACM in below ground utility pipelines is required. ACM, such as transite pipes or pipes wrapped with asbestos insulation, may be found in (or on) utility pipelines located on the property. ACM associated with utility pipelines below ground does not pose a threat to human health or environment as long as it is not disturbed, or, if it is disturbed, proper care is taken to manage and dispose of it. Utility pipelines below the ground have not been inspected. The property recipients and subsequent transferees will be given notice of the possibility of ACM in utility pipelines through a notice in the deed. The deed will provide notice to the property recipients that the Air Force will not be responsible for the ACM in utility pipelines.

ACM in Demolition Debris: ACM, which was commonly used in building materials, may be located at building demolition locations. Based upon an inspection of the property and a review of the environmental baseline survey reports, no such locations are specifically known at this base. No CERCLA remedial action is required at this time. However, it is possible that there are undiscovered locations where demolition debris may be found by the property recipient or

subsequent transferees during ground disturbance activities. The property recipient and subsequent transferees will be cautioned by notice in the deed to exercise care during ground disturbing activities. The property recipient or subsequent transferees will be required to notify the Air Force promptly of any demolition debris containing friable asbestos and believed to be associated with Air Force activities. The property recipients or subsequent transferees will be required to allow the Air Force a reasonable opportunity to investigate and, if a CERCLA remedial action is necessary, to accomplish it.

General: The deed will contain a provision stating that the property recipient and subsequent transferees, in their use and occupancy of the property, will be responsible for complying with all applicable Federal, state, and local laws relating to asbestos. The deed will also state that the Air Force will be responsible for conducting any CERCLA remedial action found to be necessary for hazardous substances released or disposed of on the property prior to the date of the deed, so long as the property recipient is not a potentially responsible party under CERCLA for the release or disposal. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the property recipient that is inconsistent with use restrictions or covenants contained in the deed or other related property transaction documents.

5.7 Drinking Water Quality. No municipal drinking water supply utility system exists on the areas to be transferred. The Record of Decision for LF-024 specifies restrictions on the installation of groundwater wells for drinking water or other purposes. IRP sites adjacent to the land to be transferred in this parcel also contain areas where the installation of groundwater wells is prohibited.

Notification will be placed in the deed documents that the proposed installation of any groundwater wells, for any purpose, shall be coordinated through, and be approved by, the Air Force prior to installation.

5.8 Lead-Based Paint (LBP), Other Facilities. A Lead-Based Paint (LBP) Survey has not been performed for any of the buildings on this property. All the buildings and structures on this property, except 9701, were constructed prior to the DoD ban on the use of lead-based paint in 1978 and are likely to contain, or be coated with, one or more coats of such paint. The VSI noted most painted surfaces to be in good condition.

The Transferee will be notified of the possible presence and existing condition of the LBP in these facilities. 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.

5.9 Flood Plains. The area northwest of the runway that lies between Route 22 and the Saranac River, and the area south of landfill LF-024 along the Salmon River, lie within a 100-year flood plain. Additional discussion can be found in Section 3.4.2 of the Final EIS.

The Transferee will be notified of the location of these areas and will be responsible for complying with all applicable laws and regulations relating to construction activities within these flood plains.

5.10 Sensitive Habitats and Wetlands. Several areas on the property to be deeded have been classified as federally regulated and/or NYSDEC-regulated wetlands. These areas are shown on Attachment 1E. Additional discussion of the wetlands can be found in Section 3.4.5 of the Final EIS.

The Transferee will be notified of the locations of these wetlands and will be responsible for assuring that no actions are taken which would adversely affect the wetlands. Any property redevelopment affecting the wetlands will be subject to Section 404 of the Clean Water Act and any applicable NYSDEC provisions.

5.11 Solid Waste. Two areas of solid waste disposal exist within the boundaries of the property to be transferred. Landfill LF-024 has been discussed in Section 5.2 above. In addition, a stump dump/construction debris area existed southwest of LF-024 and was designated as Miscellaneous EBS Factor OTH-3505-2. This area is shown on Atch 1D. All debris, including concrete, asphalt and street sweeping brushes, was excavated, removed, and disposed of off site. Soils contaminated with PAHs were removed and consolidated in another construction and demolition (C & D) area, OTH 3505-1, as shown on Atch 1B. This procedure was performed in coordination with the NYSDEC in order to allow closure of these areas under 6NYCRR Section 360. It was recommended that OTH-3505-2 (Stump Dump) be "clean closed" (i.e., No Further Action) and OTH-3505-1 (C & D) be closed as a non-permitted construction and demolition debris landfill exempt from 6NYCRR Section 360-7.1(b). NYSDEC/NYSDOH concurrence with these recommendations was received on November 6, 2002, and the Final Closure Report was issued in January 2003.

5.12 Threatened and Endangered Species. The osprey (*Pandion haliaetus*) has been identified on the property to be deeded and has been classified as a threatened species under state law. The species was observed along the Salmon River floodplain on the southern border of the base.

Notice will be provided in the transfer documents of the existence of the endangered species. The transferee will be responsible for conducting any consultations and mitigations prior to beginning new construction in endangered species habitats.


6. REGULATOR COORDINATION

The New York State Department of Environmental Conservation (NYSDEC) and the United States Environmental Protection Agency (USEPA) were notified during the BCT meeting on March 19, 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 October 8, 2003, for their formal review and comment. The NYSDEC provided comments on November 19, 2003, and the USEPA provided comments on November 21, 2003. Consolidated Draft Final documents were provided on February 12, 2004, for their formal review and comment. The NYSDEC provided concurrence, by e-mail, on March 3, 2004, and the USEPA provided concurrence, also by e-mail, on March 9, 2004.

7. FINDING OF SUITABILITY TO TRANSFER

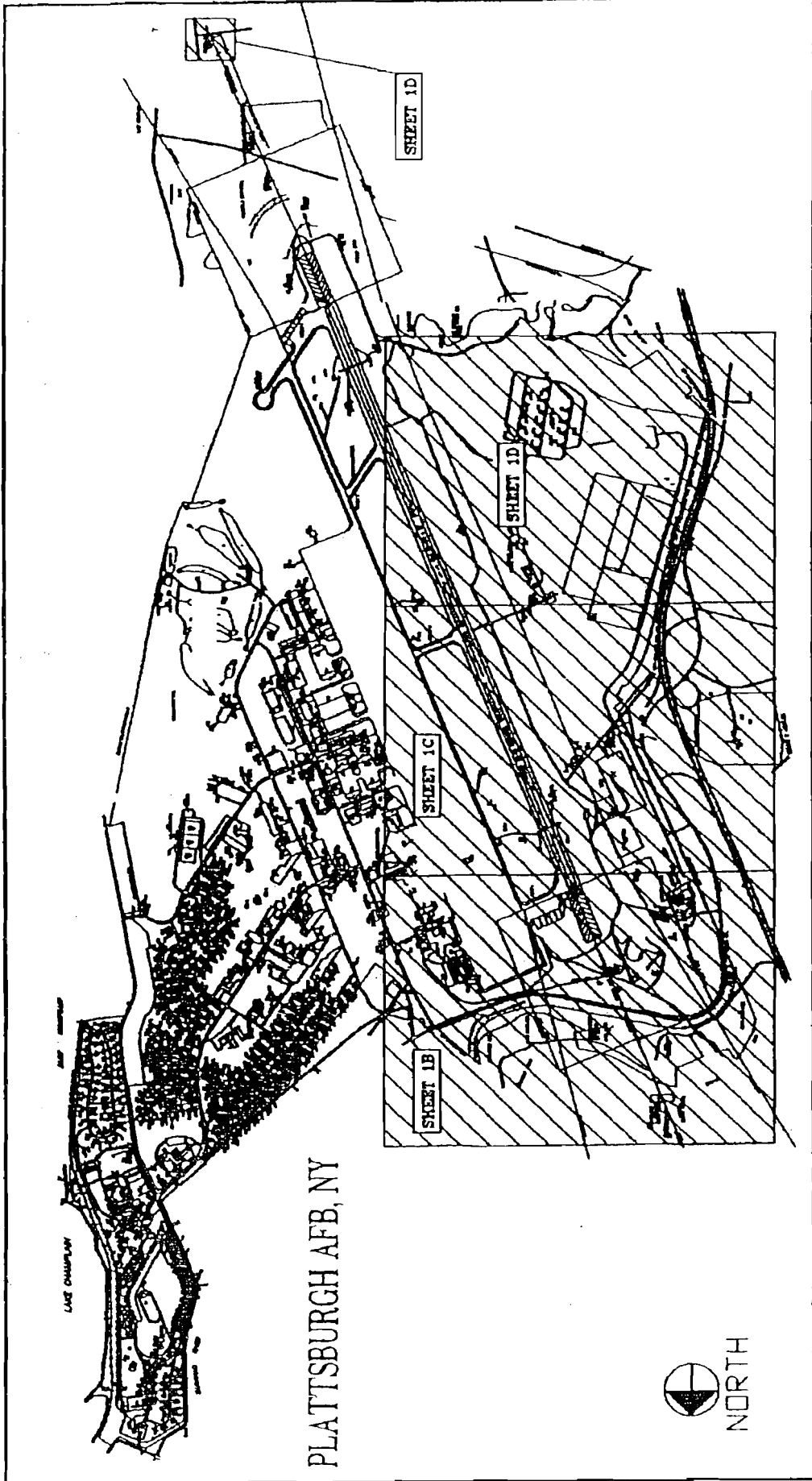
The deed proposal has been adequately assessed and evaluated for (a) environmental hazards, (b) environmental impacts anticipated from future use of the property, and (c) adequate notice of disclosure resources. The future use of this property does not present a current or future risk to human health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

25 March 2004
Date


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

Attachments:

1. Property Map(s)
2. Environmental Factors Considered
3. Notice of Hazardous Substances Release
4. Regulator Comments
5. Air Force Response to Regulator Comments



PLATTSBURGH AFB, NY

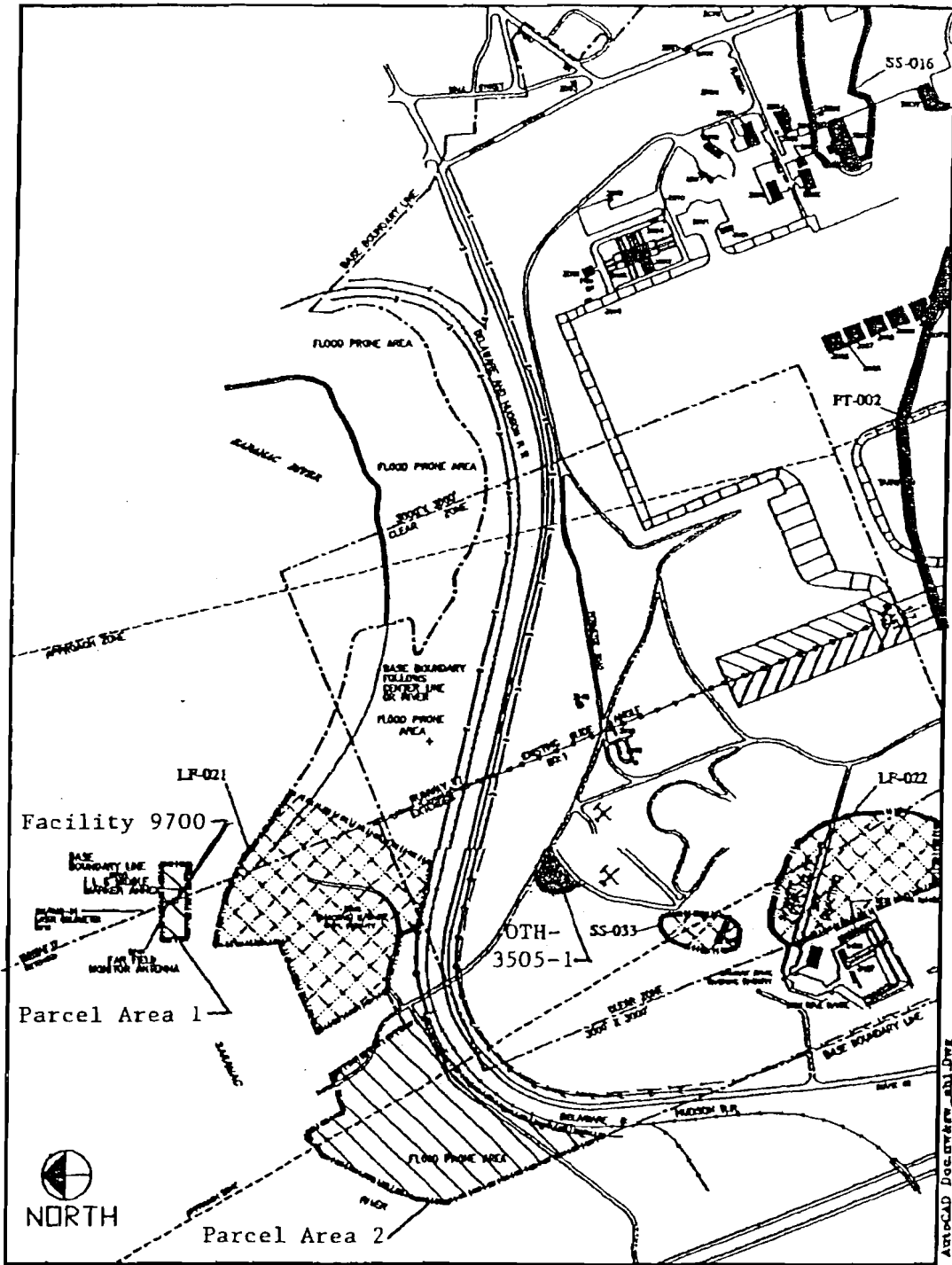


Location and Key Plan of Parcel A2.15

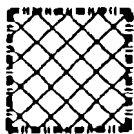
Northwest and Southwest Base Areas

Plattsburgh AFB, NY

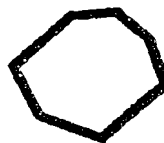
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Area of FOST



IRP Sites



Groundwater Contamination Plumes

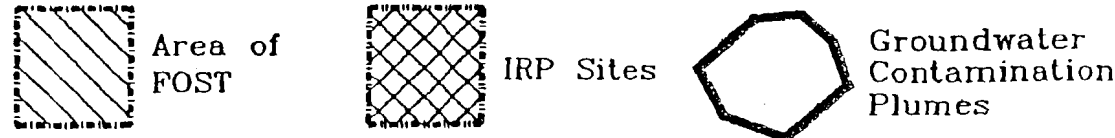
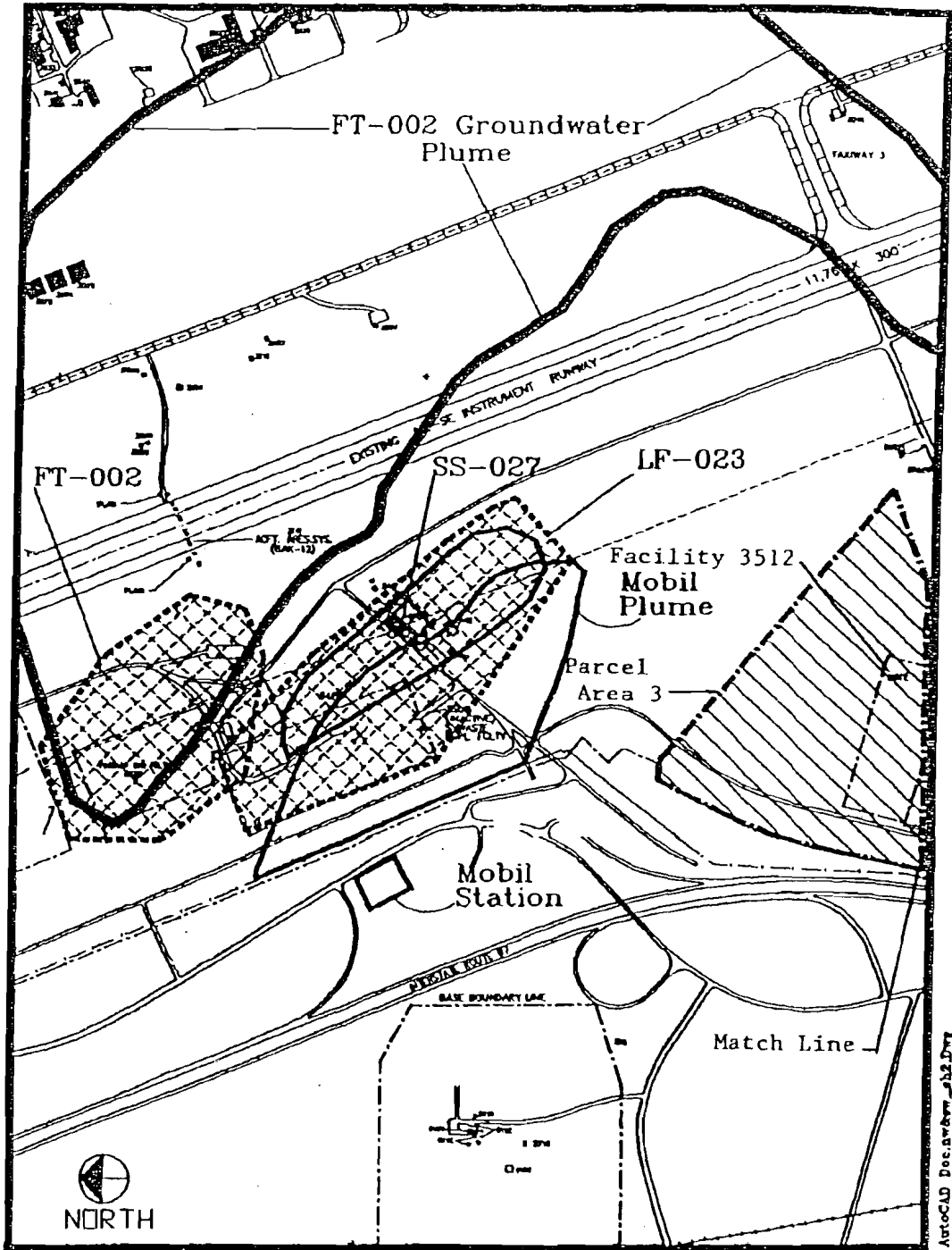
Parcel A2.15

Northwest and Southwest Base Areas

Sheet 1 of 3

Scale: 1"=950'

Plattsburgh AFB, NY

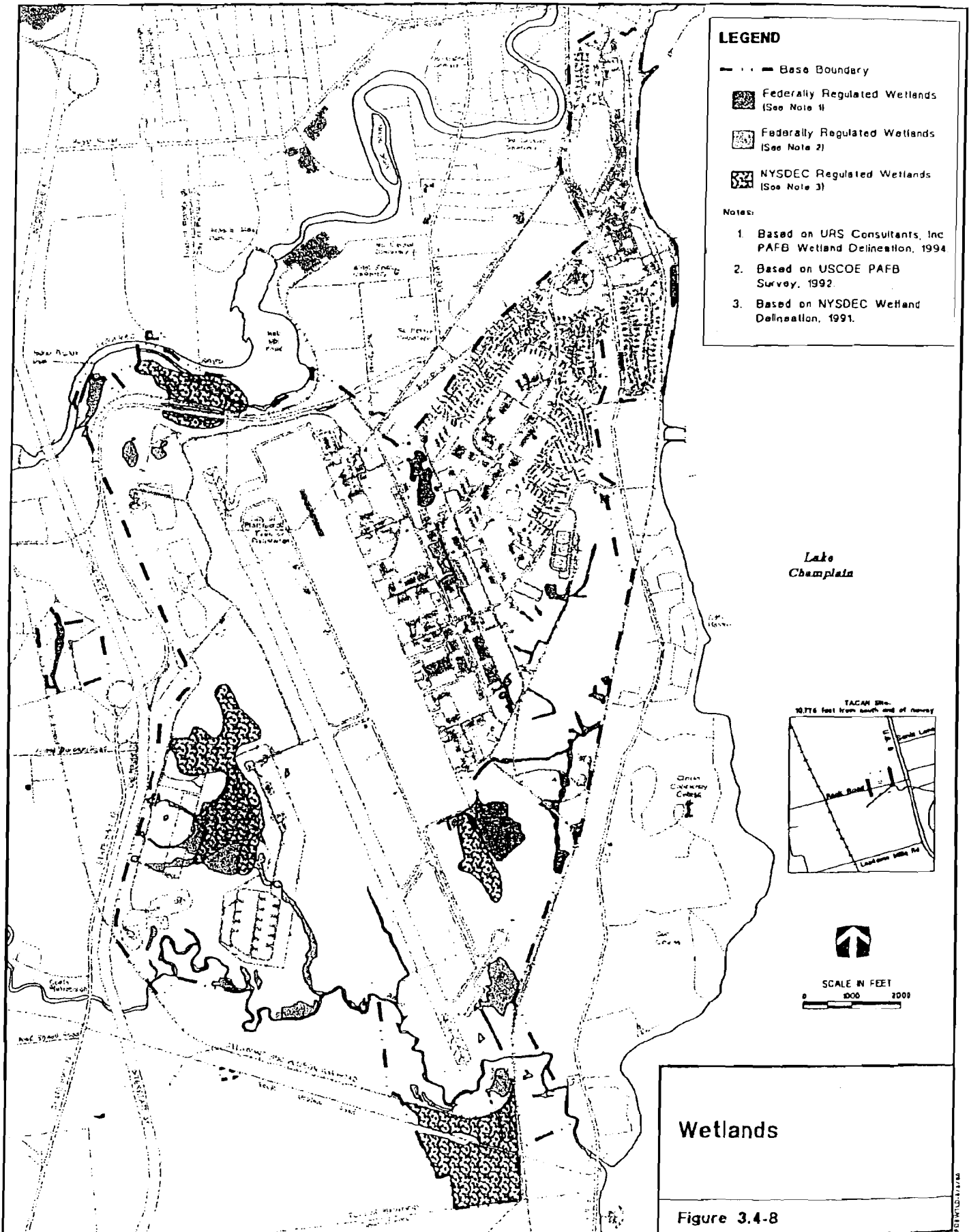


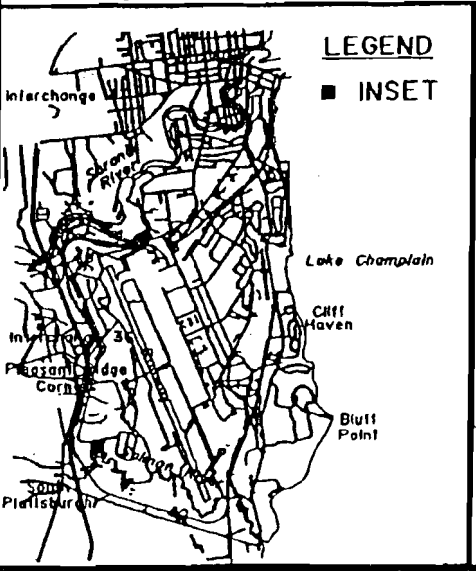
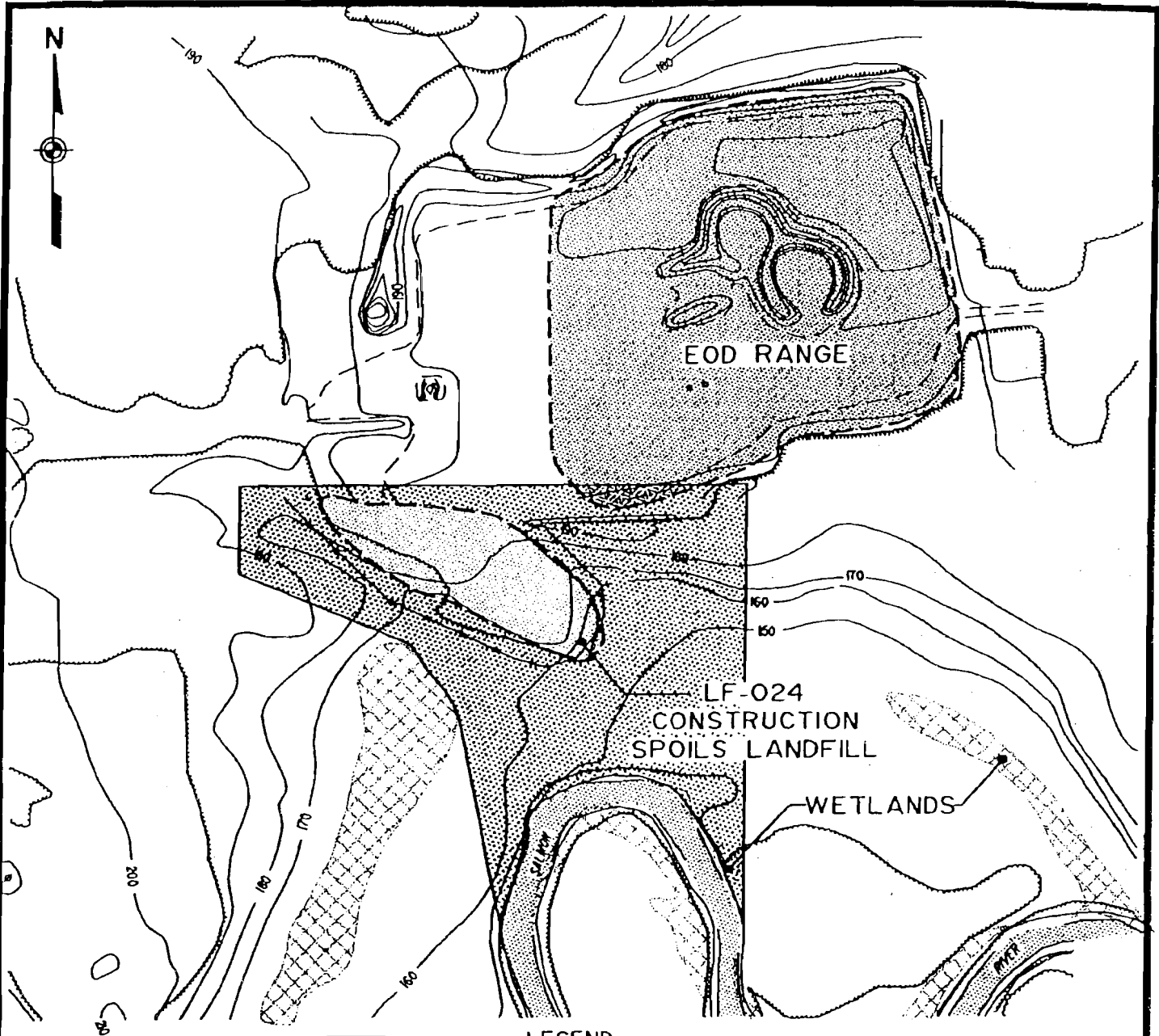
Parcel A2.15

Northwest and Southwest Base Areas









Sheet 2 of 3

Scale: 1"=950' Plattsburgh AFB, NY





LEGEND

-  GROUNDWATER USE RESTRICTION AREA
-  SALMON RIVER
-  APPROXIMATE LIMITS OF LF-024
-  APPROXIMATE LIMITS OF SS-026(EOD RANGE)
-  FEDERALLY REGULATED WETLAND
-  TOPOGRAPHIC CONTOUR (FEET AMSL)
-  EDGE OF WOODED AREA
-  BARB WIRE FENCE

200 0 200
SCALE IN FEET

ATTACHMENT 1F

**NORTHWEST AND SOUTHWEST BASE AREAS
Parcel A2.15**

Deed 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

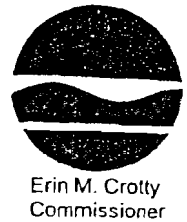
NOTICE OF HAZARDOUS SUBSTANCES RELEASE

Notice is hereby provided that the information set out below from the Basewide EBS and its Supplement provide notice of hazardous substances that have been known to have been used and disposed of on Parcel A2.15 at Plattsburgh Air Force Base and the dates the use and disposal took place. The information contained in this notice is required under the authority of regulations promulgated under Section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. Section 9620(h).

<u>Substance</u>	<u>Regulatory Synonym(s)</u>	<u>CAS Registry Number</u>	<u>Quantity</u>	<u>Date</u>	<u>Hazardous Waste ID Number (if applicable)</u>	<u>Remarks</u>
Construction and Demolition Debris	N/A	N/A	N/A	1980 through 1986	N/A	IRP Site LF-024
Explosive Ordnance Defoliant Fuel Oil	N/A	N/A	N/A	Prior to 1991	N/A	IRP Site SS-026

N/A: Not Applicable

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau A
625 Broadway, 11th Floor
Albany, New York 12233-7015
Phone: (518) 402-9621 • Fax: (518) 402-9022
Website: www.dec.state.ny.us



November 19, 2003

Mr. Michael Sorel, P.E.
Site Manager/BRAC Environmental Coordinator
AFRPA/DA Plattsburg
22 US Oval, Suite 2200
Plattsburgh, NY 12903

Re: Draft SEBS and FOST
Parcel A2.15
Plattsburgh Air Force Base
Site ID 510003

Dear Mr. Sorel:

New York State has reviewed the draft Supplemental Environmental Baseline Survey (SEBS) and draft Finding of Suitability to Transfer (FOST) for Parcel A2.15 and we offer the following comments and concerns:

1. There needs to be a statement that there will be documentation that will accompany the sale of these parcels that indicates that the Air Force will continue to monitor and maintain LF-024.
2. All institutional controls that were required by the LF-024 Record of Decision, need to be identified in the FOST.
3. LF-024 should be included in Table 4 of the SEBS.
4. For both the EOD Range and the Grenade Range notice needs to be given to any perspective owner that there is a potential, however minimal, for the presence of ordinance below the "safed" intervals of 4 feet and 3 feet respectively. Soil below these depths may be disturbed during construction activities.
5. Section 3.3 indicates that drinking water quality does not pose a concern. Is there any basis to verify this statement especially from both on-site and off site sources?
6. There is no reference in either the FOST or SEBS to the on-going remedial activities at the adjacent weapons storage area. This should be included.

RECEIVED

cc: Mike
Steve

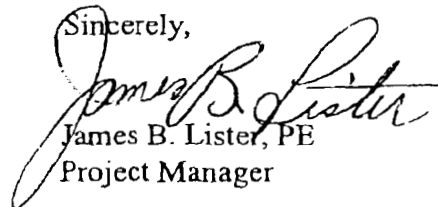
DEC 02 2003

AFRPA/DA PLBG

7. In Section 5.3 of the SEBS, the discussion mentions Table 5.4 however it should be Table 5.3.

If you have any questions please feel free to contact me at 518-402-9611.

Sincerely,



James B. Lister, PE
Project Manager

c: R. Morse, USEPA Region 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

Via Facsimile 11/21/03

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 A2.15 (Northwest and Southwest Base Areas)

Dear Mr. Sorel:

EPA has reviewed the Draft Supplemental Environmental Baseline Survey (SEBS) and Finding Of Suitability To Transfer (FOST) for Parcel A2.15 (Northwest and Southwest Base Areas). EPA comments are presented below.

Supplemental Environmental Baseline Survey (SEBS)

Page 1, Table 1.2: More information needs to be provided in the SEBS and FOST regarding Facility 3512 (Training Area), including the type of training conducted. Facilities 3512, 9400 (TACAN Station), and 9700 (Beacon Light) were not apparent on any figures in the SEBS or FOST, and need to be added.

Page 5, sec 3.4: Change "leased" to "deeded" or "transferred" in the last sentence of section 3.4 and the 1st sentence of section 3.4.4.

Page 5, sec 3.4.3: The sensitive habitat and wetland areas need to be shown on the same maps as the property to be transferred, at an appropriate scale.

Page 6, sec 3.4.5: Change "leased" to "deeded" or "transferred".

Page 6, Section 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, pages 2 and 3).

Finding Of Suitability To Transfer (FOST)

Page 1, Section 1.1: If possible, the portion of the property that may be redeveloped by Nexia should be shown on a figure.

Page 1, sec 1.2: Why is the LF-024 ROD not mentioned in this section, when the SS-026 ROD is? Both should be referenced.

Page 2, sec 2: The text references Table 1.2. Should this be Table 2.1?

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

Page 3, sec 5: Change "of" to "or" in "human health of the environment" in the 1st sentence.

Page 3, sec 5.1: It would be useful if the applicable Attachment numbers that show each of the IRP sites could be included in the text discussions of each site.

Page 3, FT-002: The date of the Interim ROD (June 2003) should be included in the text.

Page 4, LF-024: It would be useful if a brief description of the materials disposed in this landfill were added to the text. Also, the Institutional Controls (ICs) contained in the ROD for this site, including all deed restrictions and notifications, as well as the length of time for which monitoring must be conducted, need to be specified in the text. This includes limiting development of any structure on the landfill site that would adversely affect human health and safety, the prevention of any adverse action leading to the deterioration of the landfill cap, to include prohibition from installing any wells for drinking water or any other purpose which could result in the use of the underlying groundwater, and the prohibition against any excavation of the landfill cap without prior approval of NYSDEC. This also includes deed notification warning of potential short-term health risks from inhalation of dust during site construction activities. The area of groundwater use restriction shown on Figure 3 of the ROD needs to be shown on a figure in the FOST.

Page 4, SS-026: Text needs to be added briefly explaining what was done with the buried drums, chemical warfare training materials, and debris/fill areas.

Page 4, Section 5.1, last paragraph: Why are deed provisions for granting the Air Force and/or United States access to the property for the purposes of conducting the monitoring associated with LF-024 not mentioned in the FOST? Why are deed provisions for granting the United States and the regulatory agencies access to the property to conduct any investigative or remedial activities found to be necessary after property transfer not mentioned in the FOST? In the 2nd paragraph, insert "by the Air Force" between "covenant and "will", and replace "to ensure" with "stating". It is noted that prior to execution of the deed, all necessary remedial actions have not actually been taken, as this statement cannot be true until all the applicable deed restrictions and notifications (as discussed above and in the FOST) are actually placed in the deed and the deed is executed.

Page 5, middle paragraph: Clarification is needed in the text regarding what the word "area" actually refers to in the first sentence. "Transfer documents" needs to be changed to "deed".

Page 5, sec 5.3, para 1: This paragraph should probably be rewritten. The text states that there have been "several" tanks associated with the property, but Table 5.3 only lists 3 (2 of the tanks are replacements for former tanks). The text also states that "all USTs have been removed", yet the only UST mentioned in Table 5.3 is a historical one that was never found. More precise language needs to be used, and either the text or Table 5.3 need to be revised for consistency.

Page 5, sec 5.3, para 2: The 1st sentence appears to make little sense. No mention is made in Table 5.3 of any release, historic or otherwise, yet "evidence" of a release is mentioned in this sentence. Furthermore, it is not clear what tank is being referred to.

Page 6, sec 5.5, para 2: How will the transferee be notified of the possible presence and condition of lead-based paint (LBP)? How/where/to whom will notice be provided regarding transferee responsibilities related to LBP? The same questions apply to flood plains (sec 5.6) and sensitive habitat and wetlands (sec 5.8).

Page 6, sec 5.6, para 1: Should "LF-022" be "LF-024"?

Page 7, sec 5.8, para 1: Change "leased" to "transferred" or "deeded". See also sec 5.9, para 1, same change needed.

Page 7, sec 5.9: This entire section is in need of significant revision.

Paragraph 1: What does "the site of landfill area LF-024" refer to? If this means IRP site LF-024, then that is the term that should be used. Change the reference to the previous discussion of LF-024 from "paragraph 3.2.1" (there is no such paragraph in the FOST) to "Section 5.1". EBS factors OTH-3505-1 and 3505-2 need to be discussed in separate, labeled subsections of section 5.9, with much greater detail to be provided on OTH-3505-1. No information is provided regarding OTH-3505-1. Both discussions need to include the size and location of these factors, and the years the areas were used. The formal names given to both factors need to be used, and the text needs to explain more clearly how the sites were used, what was disposed in them, etc. It is not clear from the text whether OTH-3505-1 is on the property or not. This needs to be clarified in the text, and both factors need to be shown on figures in the FOST and SEBS. If the closure reports were approved by the regulators, this should be stated in the text. The significance of the clean closure of OTH-3505-2 needs to be explained in the text, e.g. cite the applicable NYSDEC regulation, if any.

Paragraph 2: This paragraph should probably be deleted. It is not clear why LF-024 is discussed a 2nd time here, when it is already referenced in the 1st paragraph of this section and discussed in Section 5.1 of the FOST. The location and boundaries of landfill LF-024 need to be provided in the deed, not just simply "to the transferee". Furthermore, "notice" being given in the "transfer documents" of the ROD "requirements" for LF-024 is completely inappropriate language. These are deed restrictions,

not notifications, they need to be in the deed, not the "transfer documents", and they are more than "requirements", they are institutional controls. The discussion of LF-024 in Section 5.1 of the FOST will need to reflect all of the above comments.

Page 7, sec 5.10: Can regulations applicable to threatened and endangered species be cited in the FOST / transfer documents?

Attachment 2: "Lease" needs to be changed to "deed" in the title of the left-hand column. Also, it would appear that either "hazardous substances (notification)" or "spills and releases" should be checked "yes" in this table, as LF-024 requires a hazardous substances notification in accordance with the ROD and CERCLA 120(h), as well as groundwater deed restrictions. Although it is noted that "IRP and Areas of Concern" is checked in the Table, the usefulness of this Table is not clear.

Attachment 1B: The rectangular-shaped area north of LF-021, which appears to be shaded to indicate that it is part of the property to be transferred, needs to be identified on the figure and discussed in the FOST. It could not be identified due to the size of print used in these figures. It is requested that larger print be used in all of the figures. Furthermore, the FOST and SEBS need to be revised to separately discuss the "four separate smaller areas" referred to in the property description section. It is suggested that each of the 4 areas be given some type of name or designation for clarity. At minimum, the individual acreages of the 4 areas need to be given, and the area designation, as well as the applicable figure number, should be cited in the discussions of each of the environmental factors contained in the SEBS and FOST, if the 4 areas are not discussed separately.

Attachment 1C: It appears that the transfer property area shaded at the southern edge of this figure may be continuous with the transfer property area shaded at the northern edge of Attachment 1D, but this could not be confirmed since there is no discussion of the 4 reported property areas in the SEBS or FOST, and no match lines on these figures. This situation needs to be rectified. It is suggested that all of the figures in the SEBS and FOST be redone with larger scales and print as very few features are discernible in any of the figures, including the entire property itself, shown on Attachment 1A, on which is impossible to make out any of the 4 areas.

Attachment 1D: Labeling for LF-024 and SS-026 appears to be switched. This needs to be corrected. The identity and significance of an area shown at the southwest corner of this figure are not apparent, nor is it apparent how an area containing Route 9 could appear on this figure, when route 9 lies essentially on the eastern-most portion of the base, and this figure shows the western-most portion of the base. Explanation and clarification are needed.

- 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

To: ISMTP@ADMIN@AFBDA.HDQ [<Morse.Bob@epamail.epa.gov>], Stephen
Gagnier@PLATTSBURGH@AFBDA.OL3
From: "James Lister" <jblister@gw.dec.state.ny.us>
Cc: Michael Sorel@PLATTSBURGH@AFBDA.OL3, Dave
Farnsworth@PLATTSBURGH@AFBDA.OL3
Subject: Re: FOST for Parcel A2.15
Attachment:
Date: 3/3/2004 4:17 PM

Steve, sorry it has taken so long but to answer your request New York
State has no comments on the Parcel A2.15 FOST. Jim

To: Stephen Gagnier@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: Re: fwd: Re: FOST for Parcel A2.15
Attachment:
Date: 3/9/2004 2:38 PM

Steve,
As per our discussion by phone today, EPA has no comments on the A2.15
FOST.
Bob

stephen.gagnier@afropa.pentagon.af.mil (Stephen Gagnier) To: Bob Morse/R2/USEPA/US@EPA
cc:
Subject: fwd: Re: FOST for Parcel A2.15
03/04/04 12:45 PM
Please respond to
stephen.gagnier

Bob,
PARC is pushing us to wrap this up, so I was
wondering if you had any additional comments.
Thanks.....Steve
----- Original Text -----

From: "James Lister" <jblister@gw.dec.state.ny.us>, on 3/3/2004 4:17 PM:
To: ISMTP@ADMIN@AFBDA.HDQ[<Morse.Bob@epamail.epa.gov>], Stephen
Gagnier@PLATTSBURGH@AFBDA.OL3
Cc: Michael Sorel@PLATTSBURGH@AFBDA.OL3, Dave
Farnsworth@PLATTSBURGH@AFBDA.OL3

Steve, sorry it has taken so long but to answer your request New York
State has no comments on the Parcel A2.15 FOST. Jim

**PLATTSBURGH AIR FORCE BASE
FINDING OF SUITABILITY TO TRANSFER (FOST)
PARCEL A2.15, NW AND SW BASE AREAS**

AFRPA RESPONSE TO REGULATORY COMMENTS

1. The New York State Department of Environmental Conservation (NYSDEC) and United States Environmental Protection Agency (USEPA) submitted comments (See Attachments 3A and 3B.) in response to the October 2003 Draft Finding of Suitability to Transfer (FOST) and Draft Supplemental Environmental Baseline Survey (SEBS). Regulatory comments are addressed as follows:

a. NYSDEC Comment #1, LF-024: The requested statement has been added to the discussion of LF-024 in Section 5.2 of the FOST.

b. NYSDEC Comment #2, LF-024: The institutional controls were added to the same section as listed above.

c. NYSDEC Comment #3, SEBS, Table 4: LF-024 has been added to the listed table.

d. NYSDEC Comment #4, EOD/Grenade Ranges: The requested notice has been added to Section 5.3 of the FOST.

e. NYSDEC Comment #5, Drinking Water Quality: A discussion of drinking water quality has been added to the SEBS (Section 3.3.2) and the FOST (Section 5.7).

f. NYSDEC Comment #6, WSA Investigation: A discussion of the ongoing radioactive waste disposal issue investigation has been added to the FOST (Section 5.4).

g. NYSDEC Comment #7, Section 5.3 (SEBS): The requested change has been made.

h. USEPA Comment #1, SEBS, Page 1, Table 1.2: Additional information on the facilities has been added and the facilities have been more clearly delineated on the attachments.

i. USEPA Comment #2, SEBS, Page 5, Section 3.4: The requested changes have been made.

j. USEPA Comment #3, SEBS, Page 5, Section 3.4.3: The maps included in the documents are the only ones available. The referenced studies are available in the AFRPA offices and have been provided to PARC for redevelopment purposes. It has also been PARC practice to perform a new wetlands delineation survey for each parcel slated for redevelopment.

The maps are provided in the FOST and SEBS to notify the transferee that these issues exist on the areas to be deeded.

- k. USEPA Comment #4, SEBS, Page 6, Section 3.4.5: The requested change has been made.
- l. USEPA Comment #5, SEBS, Page 6, Section 4: Comment is noted.
- m. USEPA Comment #6, FOST, Page 1, Section 1: Nexia has left the previously occupied area, and no further development is planned.
- n. USEPA Comment #7, FOST, Page 1, Section 1.2: A reference to LF-024 has been added.
- o. USEPA Comment #8, FOST, Page 2, Section 2: The requested change has been made.
- p. USEPA Comment #9, FOST, Page 2, Section 3: The term "FEIS" has been defined.
- q. USEPA Comment #10, FOST, Page 3, Section 5: The requested change has been made.
- r. USEPA Comment #11, FOST, Page 3, Section 5.1: Reference to the appropriate attachments has been made.
- s. USEPA Comment #12, FOST, Page 3, FT-002: The Requested date has been added.
- t. USEPA Comment #13, FOST, Page 4, LF-024: The required information has been added, and a figure showing the area of groundwater use restrictions has been added (Atch 1F).
- u. USEPA Comment #14, FOST, Page 4, SS-026: The required information has been added.
- v. USEPA Comment #15, FOST, Page 4, Section 5.1: The requested information has been added.
- w. USEPA Comment #16, FOST, Page 5: Clarification as to the referenced/described areas has been made and the requested change accomplished.
- x. USEPA Comment #17, FOST, Page 5, Section 5.3 (Para 1): The paragraph has been rewritten.
- y. USEPA Comment #18, FOST, Page 5, Section 5.3 (Para 2): The paragraph has been rewritten.

z. USEPA Comment #19, FOST, Page 6, Section 5.5 (also Sections 5.6 and 5.8): Notification of these issues is accomplished using standard language in the deeds.

aa. USEPA Comment #20, FOST, Page 6, Section 5.6: The requested change has been made.

bb. USEPA Comment #21, FOST, Page 7, Section 5.8 (Para 1) (also Section 5.9, Para 1): The requested changes have been made.

cc. USEPA Comment #22, FOST, Page 7, Section 5.9: The section has been rewritten to better describe the EBS Factors referenced. The areas have been added to the attachments. Reference only is made to LF-024.

dd. USEPA Comment #23, FOST, Page 7, Section 5.10: The reference in the FOST is for notification that these issues exist on the property to be transferred, and it is the transferee's responsibility to research current editions of applicable regulations as part of due diligence.

ee. USEPA Comment #24, FOST, Atch 2: The requested changes have been made. The attachment is required as part of the Model FOST document.

ff. USEPA Comment #25, Atch 1B: The four areas included in this parcel have been delineated on the maps, and acreages have been added to the narratives in the documents.

gg. USEPA Comment #26, Atch 1C: A match line has been delineated on Attachments 1C and 1D, and the facilities listed in the document narratives have been better delineated on the maps.

hh. USEPA Comment #27, Atch 1D: The labeling for LF-024 and SS-026 has been corrected. The small area along Route 9 is Area 4 of this parcel and is situated several miles south of the runway.

**FINAL SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS)
FOR
PARCEL A2.15
NORTHWEST AND SOUTHWEST BASE AREAS
Former Plattsburgh Air Force Base, New York
March 2004**

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 2 buildings, 2 support structures, and vacant land contained in Parcel A2.15 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 four non-contiguous areas located to the north, west, and south of the runway and flightline. The parcel contains 2 buildings, 2 support structures, and vacant open land, and is a total of approximately 285.2 acres in size. The buildings, structures, and land areas associated with this property are listed in Table 1.2 below, together with their sizes and construction dates, where applicable. This entire area was previously used by the Air Force for navigational aids, landfills, training, and to provide a buffer zone for the flightline. Detailed historical land use for these areas can be found on pages 9, 10, and 11 of Table B-1 of the Basewide EBS. The four areas included in this parcel are shown on Attachments 1A through 1D and contain the following acreages: Area 1, .9 acres; Area 2, 14.7 acres; Area 3, 263.8 acres; and Area 4, 5.8 acres.

Table 1.2, Existing Facility Information

Facility Number	Category	Usage	Size or Quantity	Year Constructed
3510	A	EOD Range	1 EA	1975
3512	A	Training Area (Mobility/ Outdoor Survival Skills)	1 EA	1987
3513	A	Practice Grenade Range	1 EA	1979
9400	B	TACAN Station	343 SF	1957
9700	B	Beacon Light	342 SF	1957
9701	S	Antenna Spt Stru	1 EA	1980
9710	S	Laser Beam Ceilometer	1 EA	1959

Abbreviations Key: B - Building/S - Structure/A - Acreage

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 Environmental Impact Statement (EIS) for Disposal and Reuse of Plattsburgh AFB prepared by Tetra Tech, Inc.; the April 1997 Closure Report for the Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks, and Aboveground Storage Tanks prepared by OHM Remediation Services Corporation; the March 1999 Site Characterization Report prepared by Fanning, Phillips, and Molnar; 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 May 1999 Final Ordnance and Explosives Removal Action Report prepared by Human Factors Applications (HFA) Inc; the September 2002 Post-Investigative Report for the EOD Range (IRP Site SS-026) prepared by Versar, Inc; Semiannual Post-Closure Monitoring Reports for Landfill LF-024 prepared by URS Consultants; the Final Record of Decision (March 2003) for IRP Site SS-026 prepared by URS Consultants; the Final Record of Decision (March 1997) for IRP Site LF-024 prepared by URS Consultants; and the Final Closure Report (January 2003) for the Excavation of Solid Waste Debris Landfills C & D (OTH 3505-1) and Stump Dump (OTH 3505-2) prepared by Versar, Inc. 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 September 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 NORTHWEST AND SOUTHWEST BASE AREAS, PARCEL A2.15

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. Environmental factors which are not applicable to this property include medical/biohazardous wastes, oil/water separators, radioactive and mixed wastes, and spills and releases. Applicable environmental factors are discussed below.

3.2.1 Installation Restoration Program (IRP) Sites. There are two IRP sites located within the boundaries of this property. These sites are discussed below; additional information can be found in Appendix D of the Basewide EBS.

LF-024 is a former construction spoils landfill located southwest of the Weapons Storage Area between the south edge of the Explosive Ordnance Disposal (EOD) area (SS-026) and the Salmon River. It is approximately 1 acre in size and was operational between 1980 and 1986. During the Site Investigation (SI), there were no organic compounds detected above background levels, but some metals above background levels were detected. A ROD was signed in March 1997, and a native soil cap was installed in 1997/1998. Long-term monitoring began in November 1998 and has been performed semiannually since that time. In accordance with the ROD, monitoring frequency will be done on an annual basis starting in November 2003. Monitoring results have been consistent and have indicated that the cap is effectively preventing contaminant migration.

SS-026 is the former Explosive Ordnance Disposal (EOD) Range located just northeast of LF-024. This 8-acre site was used between 1975 and 1991 for demolition of excess ordnance. A Site Investigation (SI) was started in 1994 and only metals were detected at concentrations elevated relative to background. Range safeing (i.e., removal of all ordnance-related materials) was conducted in 1997 and 1998, and several discoveries were made which may have an impact on human health and the environment: buried drums, chemical warfare training materials, and debris/fill areas. Upon completion of the range safeing, the U.S. Army Corps of Engineers (USACOE) issued a "Statement of Clearance" on July 16, 1999, that recommended that the range can "be used for any purpose for which the land is suited." Upon completion of this safeing work, the SI was completed, and a small area of PAH-contaminated soil was subsequently delineated, investigated, and removed. A No-Further-Action Record of Decision was issued in March 2003, received NYSDEC concurrence on March 4, 2003, and was co-signed by the USEPA on June 20, 2003.

3.2.2 Unexploded Ordnance. The Basewide EBS (Appendix G, Table G-1) lists several ordnance-related issues associated with buildings, structures, and open land areas on the property. The locations and status of the ordnance-related factors are discussed below.

ORD-3510 and ORD-3513. Facility 3510 was the EOD Range and Facility 3513 was an adjacent 40mm practice grenade range. In 1997/1998, a range safeing contract was performed by the U.S. Army Corps of Engineers (Huntsville, Alabama, Division) to address the issue of unexploded ordnance (UXO) in these two areas. The EOD Range was 100 percent cleared of all ordnance-related items to a depth of 4 feet, and anomalies deeper than 4 feet were excavated and removed. In addition, a 32.5-acre buffer zone surrounding the range was cleared to a depth of 1 foot. The grenade range was 100 percent cleared to a depth of 3 feet and deeper anomalies were

excavated and removed. A 100- to 150-foot buffer zone surrounding the range was also cleared to a depth of 1 foot. A Final Ordnance and Explosives Removal Action Report was issued in May 1999, and the USACOE has provided a “Statement of Clearance” for each of the two ranges. These certificates indicate that all UXO-related items and anomalies have been completely removed to the depths indicated, and the areas can be reused for any purpose for which they are suited. Additional information on the EOD range can be found in the discussion for SS-026 in Section 3.2.1 above.

3.2.3 Storage Tanks and Petroleum Handling Facilities. There have been several aboveground and/or underground storage tanks (AST/UST) associated with this property. A summary of the storage tanks associated with this property is presented in Table 3.2.3 below and further information on these tanks can be found in Tables E-1 and E-2 of the Basewide EBS.

Table 3.2.3, Storage Tanks

Location	Comments
9400	<p>UST-9400. An historical tank not located during the VSIs. No evidence of fill/vent piping noted. No evidence of spills and/or contamination noted.</p> <p>AST-9400-1. A 275-gallon generator supply tank which was removed and replaced by existing tank AST-9400-2. This is a 107-gallon day tank which is located within the generator room. No evidence of spills and/or contamination noted during the VSIs.</p>
9700	<p>AST-9700-1. A 275-gallon generator supply tank which was removed and replaced by existing tank AST 9700-2. This is a 21-gallon internal generator day tank. No evidence of spills and/or contamination noted during the VSIs.</p>

3.2.4 Pesticides. Regarding this property, pesticides were applied in accordance with manufacturer’s guidance, and no release above action levels is known to have occurred, and no threat is posed to human health or the environment. Chapter 3, paragraph 3.3.5 and Table 3-2 of the Basewide EBS should be referred to for a further description of the pesticides which may have been used in this area.

3.3 Disclosure Factors. Disclosure factors which are adequately described in the Basewide EBS and do not pose concerns to this property include indoor air quality, lead-based paint (high-priority facilities), PCBs, and radon. Applicable disclosure resources are discussed below.

3.3.1 Asbestos. A Basewide Asbestos Survey has been completed and is summarized in Tables H-1a and H-1b of the Basewide EBS. Buildings and structures which were included in the survey and their status are listed in Table 3.3.1 below.

Table 3.3.1, Asbestos-Containing Materials

Location	Comments
9400	Two homogeneous areas were tested and one, cement board shingles, was confirmed to contain ACM. No areas of damaged or deteriorated ACM were noted during the survey or VSI.
9700	One homogeneous area was tested, gypsum, and found to contain no ACM. No additional suspect areas noted during the VSI.

3.3.2 Drinking Water Quality. No municipal drinking water supply utility system exists on the areas to be transferred. The Record of Decision for LF-024 specifies restrictions on the installation of groundwater wells for drinking water or other purposes. IRP sites adjacent to the land to be transferred in this parcel also contain areas where the installation of groundwater wells is prohibited.

3.3.3 Lead-Based Paint (LBP), Other Facilities. A Lead-Based Paint (LBP) survey has not been performed for any of the buildings on this property. All the buildings and structures on this property, except 9701, were constructed prior to the DoD ban on the use of lead-based paint in 1978 and are likely to contain, or be coated with, one or more coats of such paint. The VSI noted most painted surfaces to be in good condition.

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), hazardous waste management, historic property, Occupational Safety and Health Administration issues, outdoor air quality, prime/unique farmlands, sanitary sewer systems (wastewater), septic tanks (wastewater), and transportation. Other factors present on the property to be deeded are discussed below.

3.4.1 Flood Plains. The area northwest of the runway that lies between Route 22 and the Saranac River, and the area south of landfill LF-024 along the Salmon River, lie within a 100-year flood plain. Additional discussion can be found in Section 3.4.2 of the Final EIS.

3.4.2 Sensitive Habitats and Wetlands. Several areas on the property to be deeded have been classified as federally regulated and/or NYSDEC-regulated wetlands. These areas are shown on Attachment 1E. Additional discussion of the wetlands can be found in Section 3.4.5 of the Final EIS.

3.4.3. Solid Waste. Several areas of solid waste disposal exist within the boundaries of the property to be deeded. The site of landfill area LF-024 is discussed in paragraph 3.2.1 above. In addition, a stump dump/construction debris area exists southwest of LF-024. This area has been investigated and excavated as Miscellaneous EBS Factor OTH-3505-2. All debris was removed and disposed of off site, and PAH-contaminated soil was removed and consolidated in another

C&D area, OTH-3505-1. The closure report for both EBS factors has been issued and area OTH-3505-2 has been “clean-closed.”

3.4.4 Threatened and Endangered Species. The osprey (*Pandion haliaetus*) has been identified on the property to be deeded and has been classified as a threatened species under state law. The species was observed along the Salmon River floodplain on the southern border of the base.

CHAPTER 4 - PROPERTY TRANSFER CATEGORY

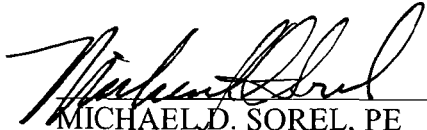
Based on a review of the Basewide EBS and a VSI of the property, the buildings and structures are considered Department of Defense Environmental condition Categories (ECC) 1 or 4, as indicated in Table 4 below. Category 1 areas are those areas where no release or disposal of petroleum products or hazardous substances have occurred. Category 4 areas are those areas where release, disposal, and/or migration of hazardous substances have occurred, and the required remedial actions have been taken. Changes in the condition category of these facilities, since publication of the Basewide EBS, are also presented in Table 4 below.

Table 4, Property Transfer Category

Location	Old ECC	New ECC	Comments
3510	7	4	NFA ROD for SS-026 complete.
3512	2	1	Petroleum storage; no release.
3513	7	1	No release, disposal, or migration.
9400/9700	2	1	Petroleum storage only; no release.
9701	1	1	No environmental concerns associated with this structure.
9710	1	1	No environmental concerns associated with this structure.
LF-024	-	4	ROD for LF-024 complete.

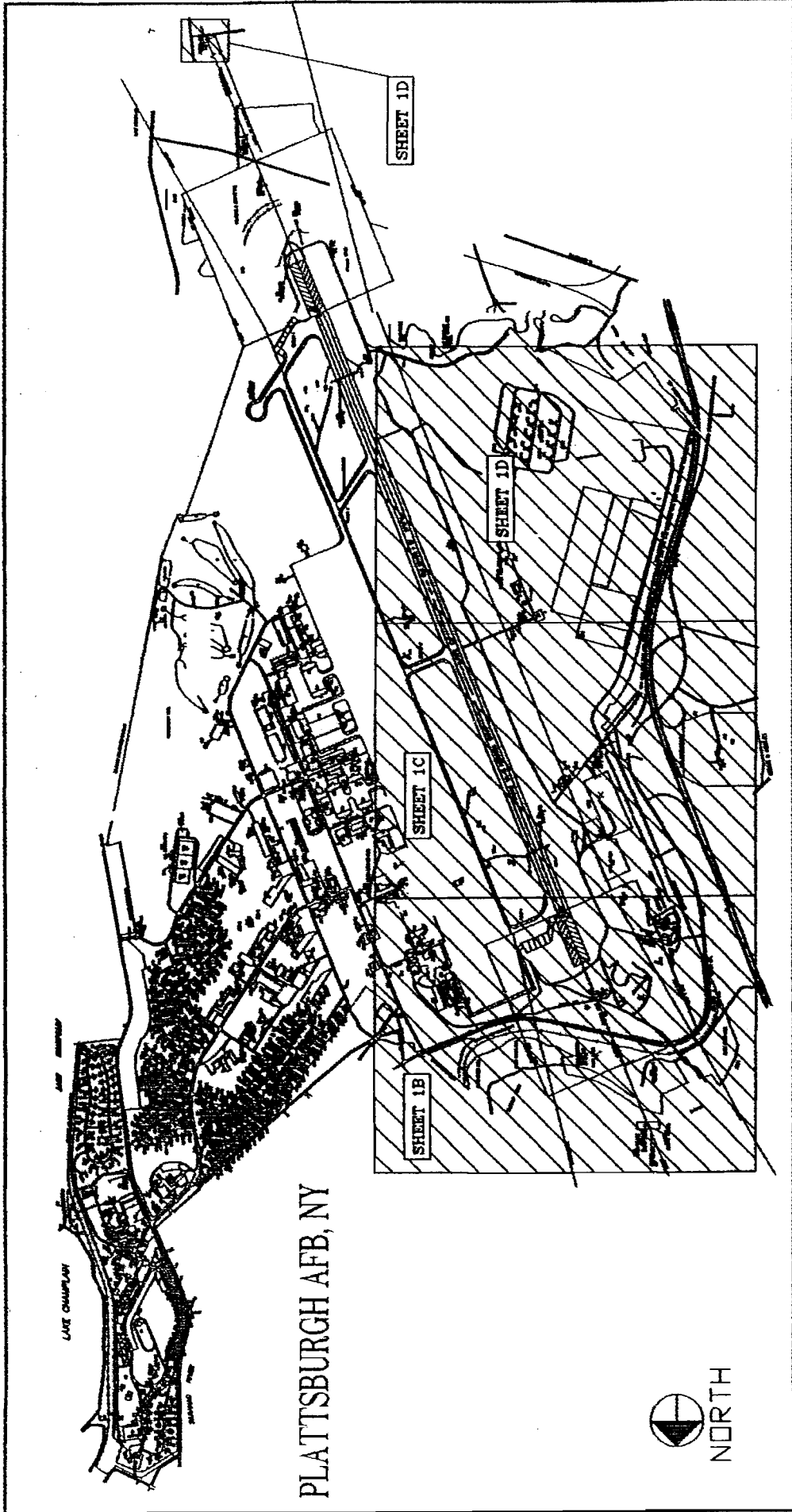
CHAPTER 5: CERTIFICATION

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.



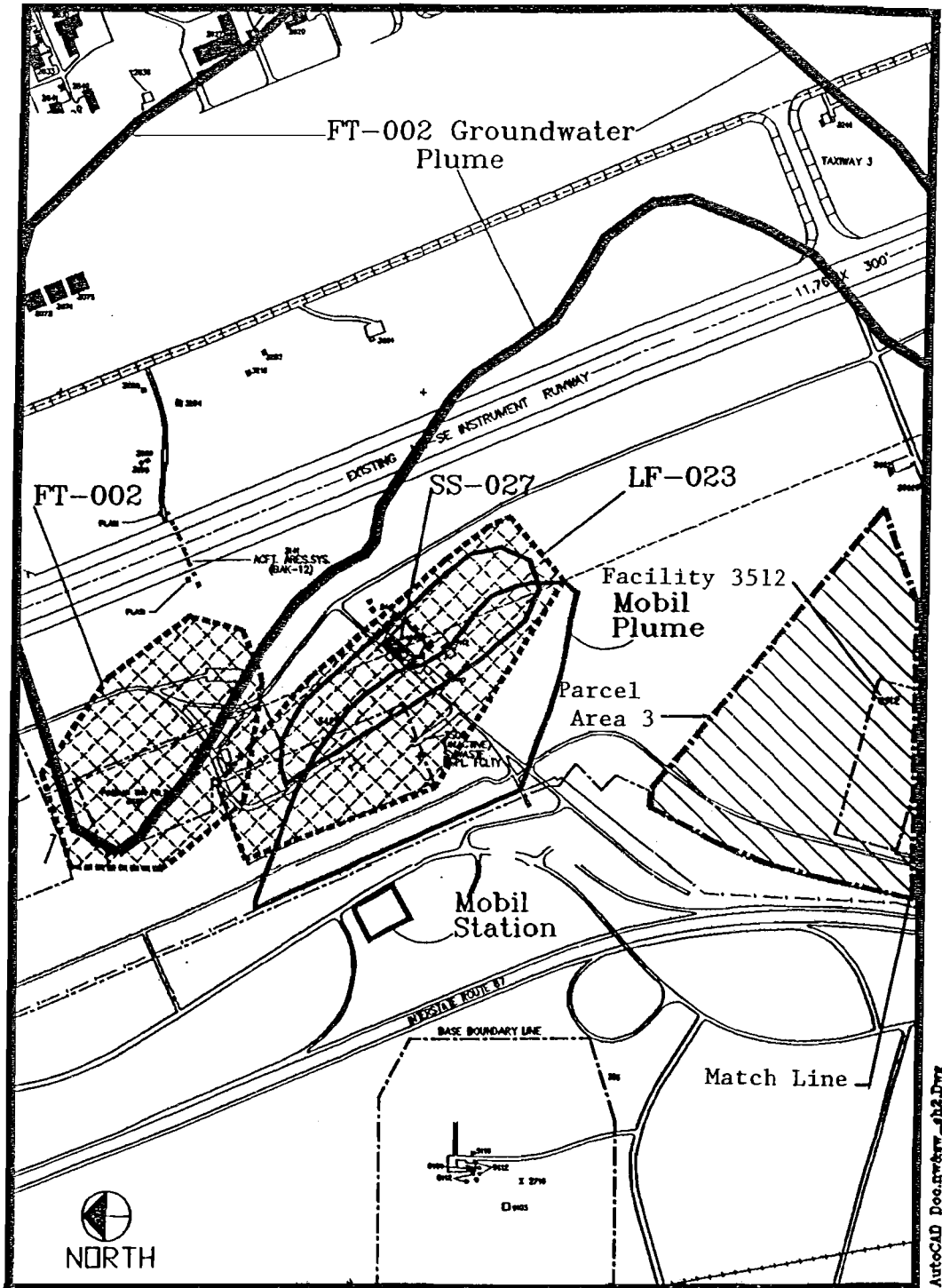
MICHAEL D. SOREL, PE
BRAC Environmental Coordinator
AFRPA/DA Plattsburgh

3-11-04
Date

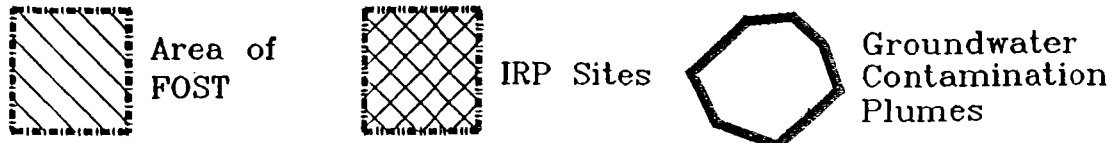


Location and Key Plan of Parcel A2.15 Northwest and Southwest Base Areas Scale: 1"=2500'

Plattsburgh AFB, NY



AutoCAD Doc.nwr\aw_2h2.Dwg

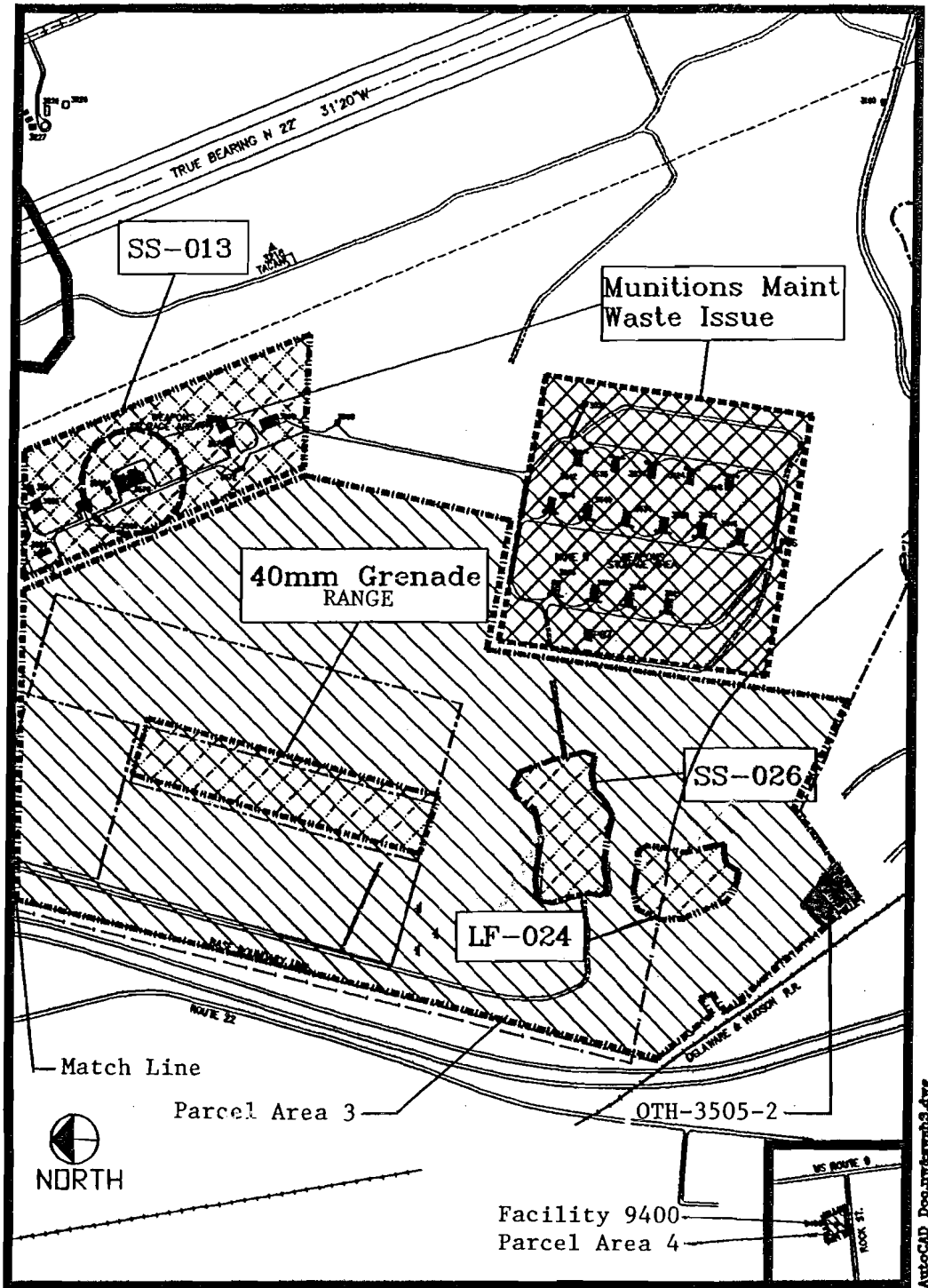


Parcel A2.15

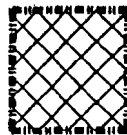
Northwest and Southwest Base Areas

Sheet 2 of 3

Scale: 1"=950' Plattsburgh AFB, NY



Area of
FOST



IRP Sites
& Areas
of Concern



Groundwater
Contamination
Plumes

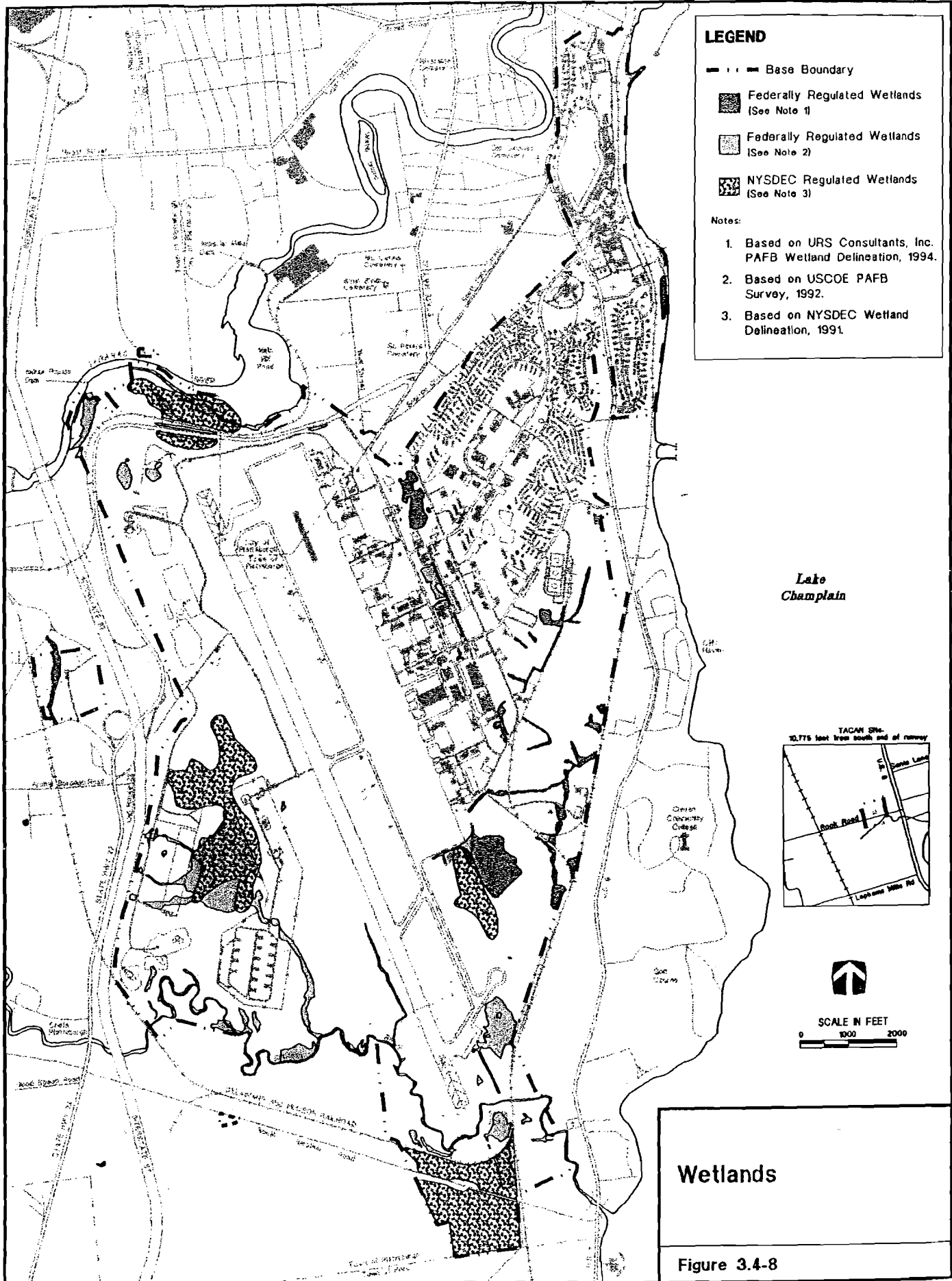
Parcel A2.15

Northwest and Southwest Base Areas

Sheet 3 of 3

Scale: 1"=950'

Plattsburgh AFB, NY



LEGEND

- Base Boundary
- Federally Regulated Wetlands (See Note 1)
- Federally Regulated Wetlands (See Note 2)
- NYSDEC Regulated Wetlands (See Note 3)

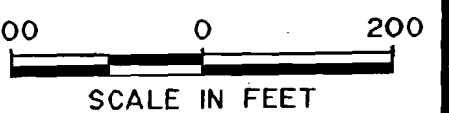
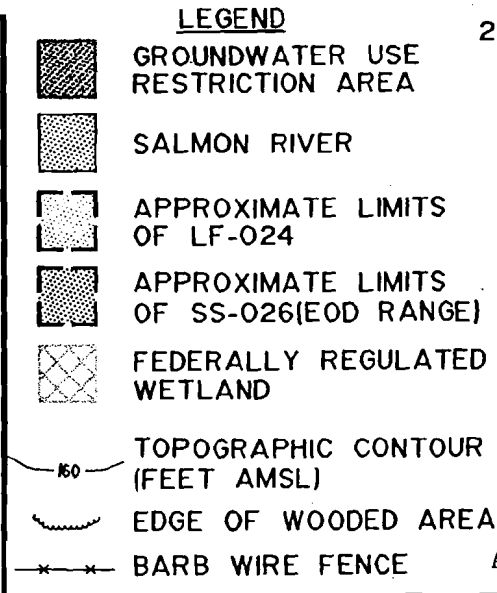
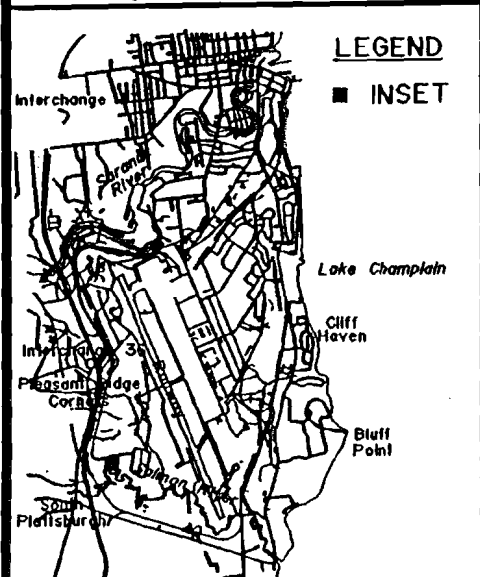
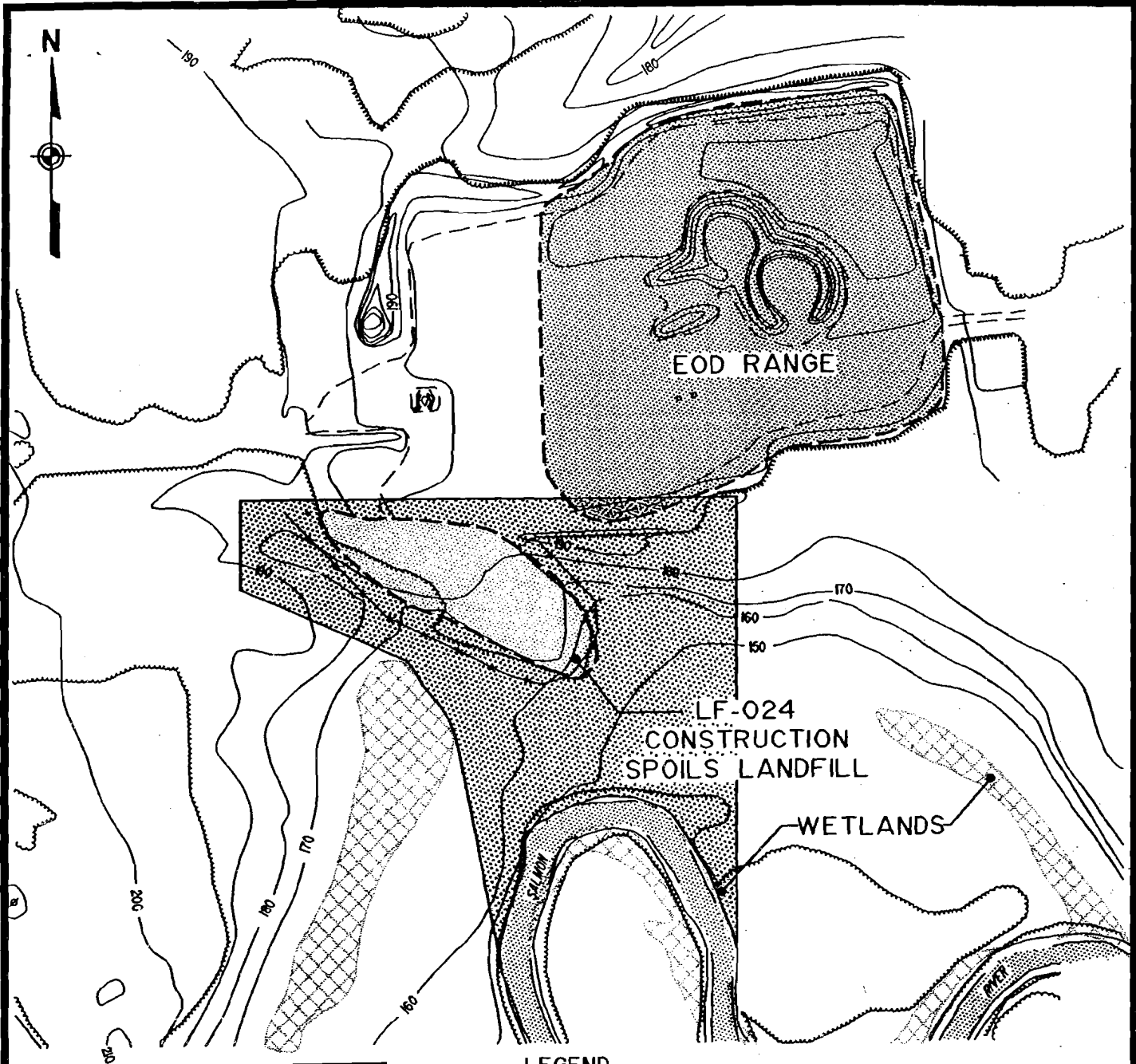
Notes:

1. Based on URS Consultants, Inc. PAFB Wetland Delineation, 1994.
2. Based on USCOE PAFB Survey, 1992.
3. Based on NYSDEC Wetland Delineation, 1991.

Wetlands

Figure 3.4-8

PBBW/CB-87/24



ATTACHMENT 1F

**PUBLIC NOTICE****FINDING OF SUITABILITY TO TRANSFER (FOST)**

The United States Air Force Real Property Agency (AFRPA) announces it has completed a Finding of Suitability to Transfer (FOST) for approximately 285.2 acres of land (Parcel A2.15, Northwest and Southwest Base Areas) at Plattsburgh Air Force Base. The FOST is based on extensive review of the environmental condition of the property and was signed on March 25, 2004. The environmental review and documentation which led to the FOST were accomplished under the National Environmental Policy Act (NEPA) and done in consultation with federal and state environmental regulatory agencies.

The property became available as a result of Public Law 101-510, 10 United States Code (USC) Defense Base Closure and Realignment Act of 1990 and the subsequent closure of Plattsburgh Air Force Base.

A copy of the FOST and Supplemental Environmental Baseline Survey (SEBS), including regulatory comments and responses, will be maintained at the local AFRPA office. Individuals interested in reviewing the information should contact:

Mr. Michael D. Sorel, PE
Site Manager/BRAC Environmental Coordinator
Air Force Base Real Property Agency
304 New York Road
Plattsburgh, New York 12903
518-563-2871

FINAL FINDING OF SUITABILITY TO TRANSFER (FOST)
LAKEFRONT AREA
Parcel K-2
Former Plattsburgh Air Force Base, New York
May 2004

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 the former Plattsburgh Air Force Base (AFB), New York, to City of Plattsburgh. The property is described in Section 2 below. The property will be transferred via a Public Benefit Conveyance in accordance with the Federal Property and Administrative Services Act of 1949, as amended [40 USC Part 484(K)(2)]; its anticipated use is recreational.

1.2 This FOST is a result of a thorough analysis of information contained in the following documents: (1) the Final Environmental Impact Statement (FEIS) for the Disposal and Reuse of Plattsburgh AFB, NY, November 1995; (2) the Base Realignment and Closure Cleanup Plan (BCP) dated May 1997; (3) the Finding of Suitability to Lease (FOSL) for the Lakefront Area, dated January 1997 (signed February 12, 1997); (4) the Supplemental EBS (SEBS) for the Parcels K-1 and K-3, dated October 1999; (5) Visual Site Inspection(s) (VSI(s)) conducted November 1996, June 1999, November 2000, and February 2004; (6) the Finding of Suitability to Transfer (FOST) for the Lakefront Area Parcels K-1 and K-3, dated November 1999 (signed November 22, 1999); (7) the Final Habitat Assessment and Wetland Delineation Report performed by URS Consultants, Inc., dated February 1994; (8) the 1994 Habitat and Shoreline (Threatened and Endangered Species) Survey (dated June 26, 1995) performed by the New York Natural Heritage Program; (9) the Final Background Surface Soil & Groundwater Survey performed by URS Consultants, Inc., dated January 1996; (10) the Archeological Survey Report of Plattsburgh Air Force Base, dated April 1995, performed by the U.S. Army Construction Engineering Research Laboratories/Technical Assistance Center (USACERL/TAC); (11) the Environmental Assessment of Alternative Land Uses (Supplement to the November 1995 FEIS) prepared by Tetra Tech, Inc., dated May 2000; (12) the Land Use Control/Institutional Control Management Plan for Former Plattsburgh AFB, dated October 2002; (13) the Semiannual Monitoring Report for the April 2003 Groundwater Sampling for Sites SS-018 and SS-028 prepared by URS Consultants, Inc., dated July 2003.

2. PROPERTY DESCRIPTION

The Lakefront Area (Parcel K-2) totals 2.44 acres along the base's northeast boundary and consists of approximately 500 feet of Lake Champlain shoreline and extends west across the existing Canadian Pacific Railroad. The property includes a 10-foot wide asphalt recreation trail along the west edge and a 4-foot high chain link fence along the trail's east edge (separating it

from the railroad tracks). There are no buildings present on the property. The property also includes several utility easements (for sewer and electrical service) and a 100-foot wide right-of-way for the Canadian Pacific Railroad. The property is shown in attachments 1A through 1C.

Note: The entire Lakefront Area of the former Plattsburgh AFB consists of approximately 8,000 feet of Lake Champlain Shoreline, of which Parcel K-2 is a part. The entire Lakefront Area was evaluated in a FOSL dated January 1997 (and signed by the Director, Air Force Base Conversion Agency on February 12, 1997) and was subsequently leased to the City of Plattsburgh. The Lakefront Areas north and south of Parcel K-2 are designated as Parcels K-1 and K-3, respectively, and were reevaluated in 1999 as part of a separate Finding of Suitability to Transfer, dated November 1999 (signed November 22, 1999), and have been transferred to the City of Plattsburgh.

3. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts of this proposal have been adequately analyzed and disclosed in compliance with NEPA. The anticipated use of the property complies with the projected recreational land use for this area as outlined in the May 2000 Environmental Assessment of Alternative Land Uses (Supplement to the November 1995 FEIS).

4. ENVIRONMENTAL CONDITION OF THE PROPERTY

Based on a review of the Basewide EBS and a VSI of the property, Parcel K-2 is considered Department of Defense Environmental Condition Category 4. Category 4 areas are those where release, disposal, and/or migration of hazardous substances have occurred, and all remedial actions necessary to protect human health and the environment have been taken. The property is considered Category 4 because of contamination present that is associated with IRP Sites SS-018 and SS-028. The condition of the property has changed from a Category 7 as a result of the completion of the Record of Decision for IRP Sites SS-018 and SS-028.

5. DEED RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Section 1.2 were evaluated to identify environmental factors (Atch 2) that 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 in the deed or as specific notification 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.

The Air Force has determined that the remaining factors listed in Atch 2 pose no threat to human health or the environment and, therefore, require neither deed restrictions nor notifications to the Transferee.

5.1 Hazardous Substances Notification

No hazardous substances are known to have been stored on this property. Parcel K-2 contains low levels of contamination in the soil and groundwater and is discussed further in Section 5.2 below. A hazardous substance release notice will be given in transfer documents of the type and quantity of hazardous substances and the time at which release took place.

A covenant will be included in the deed to ensure that any 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. A provision will also be included in the deed to allow the United States access to the property in any case in which such response or corrective action is found to be necessary, or where such access is necessary to carry out a response or corrective action on adjoining property.

5.2 Installation Restoration Program (IRP) CERCLA Sites

The U.S. Air Force, the U.S. Environmental Protection Agency (USEPA), and New York State Department of Environmental Conservation (NYSDEC) entered into a Federal Facilities Agreement (FFA) effective September 1991, under Section 120 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

5.2.1 Two IRP Sites (SS-018 and SS-028) are located on the boundaries of the property where release of hazardous substances occurred.

SS-018 is the former Auto Hobby Shop (Building 509). A revised draft final Remedial Investigation (RI) report was completed April 1996. Contaminants identified in the soil, during the RI, include one (1) volatile and eight (8) semivolatile organic compounds (polycyclic aromatic hydrocarbons [PAHs]), two (2) pesticides, twelve (12) inorganics, and sixteen (16) metals. In addition, volatile organic compounds, exceeding Applicable or Relevant and Appropriate Requirements (ARARs), have been detected in the groundwater. Additional groundwater investigation and additional human health risk assessments have been performed as part of the Remedial Investigation of IRP SS-028 (See separate discussion below.), which is immediately to the north.

SS-028 is the Civil Engineering Open Storage Area next to Building 508 and adjacent to Site SS-018. A Remedial Investigation (RI) was completed in 1999. The RI included soil and groundwater sampling from 27 boring locations and six (6) monitoring wells to delineate the extent of chlorinated hydrocarbons in the groundwater. The RI also included a human health risk assessment and a screening level ecological risk assessment that incorporates data collected from remedial activities at IRP Sites SS-018 and SS-019. The RI indicated groundwater contaminated with chlorinated hydrocarbons (up to 43 parts per billion [ppb] exists in several locations within Sites SS-018 and SS-028. Methyl tert-butyl ether (MTBE), an additive to unleaded fuel, was detected at five monitoring well locations, with the highest concentration (430 ppb) occurring at MW-28-007. Additional groundwater sampling was conducted, during 1999 and 2000, in consultation with NYSDEC Region 5, Bureau of Spill Prevention and Response, to further

investigate the MTBE groundwater contamination. The investigation confirmed presence of MTBE on site, but did not find MTBE in three monitoring wells located upgradient of the site. The RI also indicates surface soil contamination to the north and west of Building 509 containing PAHs totaling up to 141,000 ppb. As a result of the RI, a removal action was performed in December 1998 to remove a source of the groundwater chlorinated hydrocarbon contamination; approximately 112 cubic yards of soil (southeast of Building 485) was removed (A closure report has been completed and regulatory comments received.).

A Record of Decision for IRP Sites SS-018 and SS-028 was signed in September 2000. The selected remedy includes restriction of land use to nonresidential use (See Attachment 1C.); prohibition of the installation of any wells for drinking water or any other purposes that could result in the use of the underlying groundwater; prohibition of discharge of groundwater withdrawn during construction dewatering to the ground or surface water, without prior approval of the NYSDEC; periodic monitoring of site groundwater and groundwater seeps for volatile organic compounds (VOCs) and MBTE until groundwater contaminant levels fall below current regulatory standards; and five-year reviews of the remedy in accordance with Section 121(c) of CERCLA. Groundwater sampling and monitoring for VOCs and MTBE have been conducted semiannually since May 2001. Chlorinated hydrocarbons have been detected at up to 10.7 ppb; MTBE has been detected at up to 529 ppb. (No other VOCs have been detected.)

Based on the above, three institutional controls (ICs) will be placed upon the property in the deed in the form of use/access/deed restrictions. These ICs will be removed, in coordination with the NYSDEC and USEPA, from the deed in the future when all contaminant levels in the groundwater fall below New York State Water Quality Standards for two consecutive years (four consecutive semiannual groundwater sampling events). The ICs will:

- (1) Restrict development (in the area shown at Attachment 1C and 1D) to that which supports only nonresidential use.
- (2) Prohibit installation of any wells for drinking water or any other purposes that could result in the use of the underlying groundwater depicted at Attachments 1C and 1D.
- (3) Prohibit discharge of groundwater from the area depicted at Attachments 1C and 1D that is withdrawn during construction dewatering to the ground or surface water without prior approval of the New York State Department of Environmental Conservation.
- (4) Protect all groundwater monitoring wells on the property (as shown at Attachment 1C or detailed at Attachment 1D).

These institutional controls will be exercised in accordance with the Land Use Control/Institutional Control Management Plan for Plattsburgh AFB and applicable Federal, state, or local laws. The institutional controls pose minimal impact to the human population and to the environment, will not create any risks to the environment, and are unlikely to compromise any future environmental cleanup/mitigation efforts.

All removal or remedial actions to protect human health and the environment, in accordance with CERCLA Section 120(h)(3) have been met for the property. The Record of Decision for IRP Sites SS-018 and SS-028, dated August 2000 and signed by the AFBCA and USEPA on September 19, 2000 and September 27, 2000, respectively, has identified the actions needed to protect human health and the environment and all of those actions have been implemented. A covenant will be included in the deed to ensure that environmental investigations and remedial activities will not be disrupted at any time. Such covenants include, but are not limited to, prohibiting activities that could disrupt any remediation activities or jeopardize the protectiveness of those remedies, such as (1) surface application of water that could impact the migration of contaminated groundwater; (2) subsurface drilling or use of groundwater unless the Air Force determines that there will be no adverse impacts on the cleanup process; or (3) construction that would interfere with, negatively impact, or restrict access for cleanup work. In addition, prior to any structure being erected in the groundwater contaminated area of the parcel, the potential for vapor intrusion must be evaluated; and if it is determined that a potential human health impact is possible, then mitigation of the vapor intrusion must be included in the design/construction of the structure. The deed will reserve a non-exclusive easement to allow continued access for the Air Force (or its designated contractor) and regulatory agencies to monitor the effectiveness of cleanup, perform five-year reviews, and/or take additional remedial or removal actions.

5.2.2 There are two (2) IRP sites located on adjacent property.

SS-019 is the Civil Engineering Paint Shop centered around the northern portion of the western wing of Building 508. This area was included in the IRP due to the storage of waste paints/thinners and spillage/cleanup activities that occurred here. Contaminants detected here include five (5) volatiles and 24 semivolatile organic compounds (mostly PAHs), one (1) PCB, and fifteen (15) metals. An SI was completed in 1994 and recommended no further action. Regulatory concurrence for no further action was received from USEPA in 1995, and the site has been closed out.

SS-025 was an abandoned 10,000-gallon UST, used to store motor fuel. This site is a fuel spill site subject to the Resource Conservation and Recovery Act (RCRA), with oversight being provided by the NYSDEC Region 5 Spill Response Office. The UST was removed in 1991. Laboratory analysis of soil samples, taken after the tank was removed, found no contamination. An Air Force No Further Action Decision Document was signed in 1992 and concurrence received from NSYDEC Region 5 in March 1997.

5.3 Asbestos-Containing Materials.

There is no known asbestos-containing material (ACM) present on this property. However, ACM, such as transite pipes or pipes wrapped with asbestos insulation, may be found in or on utility pipelines located on the property. No CERCLA remedial action for ACM in belowground utility pipelines is required. ACM associated with utility pipelines below ground does not pose a threat to human health or environment as long as it is not disturbed, or if it is disturbed, proper care is taken to manage and dispose of it. Utility pipelines below the ground

have not been inspected. The property recipients and subsequent transferees will be given notice of the possibility of ACM in utility pipelines through a notice in the deed. The deed will provide notice to the property recipients that the Air Force will not be responsible for the ACM in utility pipelines.

ACM, which was commonly used in building materials, may be located at building demolition locations. Based upon an inspection of the property and a review of the environmental baseline survey reports, no such locations are specifically known at this base. No CERCLA remedial action is required at this time. However, it is possible that there are undiscovered locations where demolition debris may be found by the property recipient or subsequent transferees during ground disturbance activities. The property recipient and subsequent transferees will be cautioned by notice in the deed to exercise care during ground disturbing activities. The property recipient or subsequent transferees will be required to notify the Air Force promptly of any demolition debris containing friable asbestos and believed to be associated with Air Force activities. The property recipients or subsequent transferees will be required to allow the Air Force a reasonable opportunity to investigate and, if a CERCLA remedial action is necessary, to accomplish it.

The deed will contain a provision stating that the property recipient and subsequent transferees, in their use and occupancy of the property, will be responsible for complying with all applicable Federal, state, and local laws relating to asbestos. The deed will also state that the Air Force will be responsible for conducting any CERCLA remedial action found to be necessary for hazardous substances released or disposed of on the property prior to the date of the deed, so long as the property recipient is not a potentially responsible party under CERCLA for the release or disposal. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the property recipient that is inconsistent with use restriction or covenants contained in the deed or other related property transaction documents.

5.4 Drinking Water Quality.

Groundwater contamination is present on the property and is discussed in Section 5.2.1 above. Potable water is not present on the property but is available via the city-operated water supply and distribution system, on the property immediately to the west. The Transferee will be prohibited from using the groundwater as specified in Section 5.2.1 above.

5.5 Flood Plains

The immediate shoreline area on the property is located within a 100-year flood plain. The Transferee will be responsible for complying with any applicable laws and regulations relating to construction activities within the flood plain.

5.6 Sensitive Habitat/Threatened and Endangered Species

There are no Federally listed threatened or endangered species present on Plattsburgh AFB. However, a sensitive habitat containing one state-listed plant species has been identified on the property. According to the 1994 Habitat and Shoreline Survey, several populations of marsh horsetail (*Equisetum palustre*) were found along the shoreline in Parcel K-2.

No actions can be taken that would adversely affect the species. The Transferee will be notified in the deed of the presence of the state listed-species Marsh horsetail (*Equisetum palustre*) on the property. The deed will contain a restriction requiring the property owner to protect the habitat and conduct any required consultations (with applicable regulatory agencies) and mitigations prior to beginning new construction in sensitive habitats.

5.7 Transportation (Railroad)

An active railroad (operated by the Canadian Pacific Railroad) Right-of-Way passes through the property. Any activity by the transferee within the right-of-way must be approved by the Canadian Pacific Railroad.

5.8 Historic Property (Archeological/Native American, Paleontological).

An Archeological Survey Report for Plattsburgh Air Force Base (including the Lake Champlain Shoreline) was completed in 1995. Due to Plattsburgh's role in the War of 1812 and the tendency for Native Americans to locate sites near major water sources, the Lakefront Area may contain some archeological artifacts. A covenant shall be placed in the deed requiring the Transferee, should any archeological site be discovered, to stop work (construction and/or any actions that may adversely impact the site) promptly and obtain comments, in writing, from the New York State Historic Preservation Office regarding appropriate treatment of the site and submit a mitigation plan should these sites be disturbed.

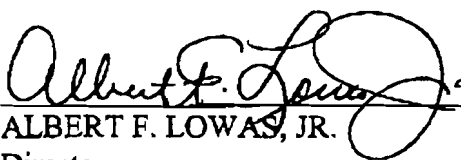
6. REGULATOR COORDINATION

The New York State Department of Environmental Conservation (NYSDEC) and the United States Environmental Protection Agency were notified on August 8, 1998, 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 January 17, 2001, for their formal review and comment. USEPA comments were provided on February 12 and 16, 2001 (Atch 5A and 5B), and have been incorporated and addressed (Atch 6). NYSDEC comments (Atch 5C) were provided on February 20, 2001, and were incorporated or addressed (Atch 6). Revised Draft documents were provided for review and comment on February 11, 2004. NYSDEC comment (Atch 5D) was provided on March 18, 2004, and was incorporated (Atch 5E and Atch 6). USEPA indicated (Atch 5F), on March 22, 2004, that it had no comments on the Parcel K-2 FOST.

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. Parcel K-2 is, therefore, suitable for transfer.

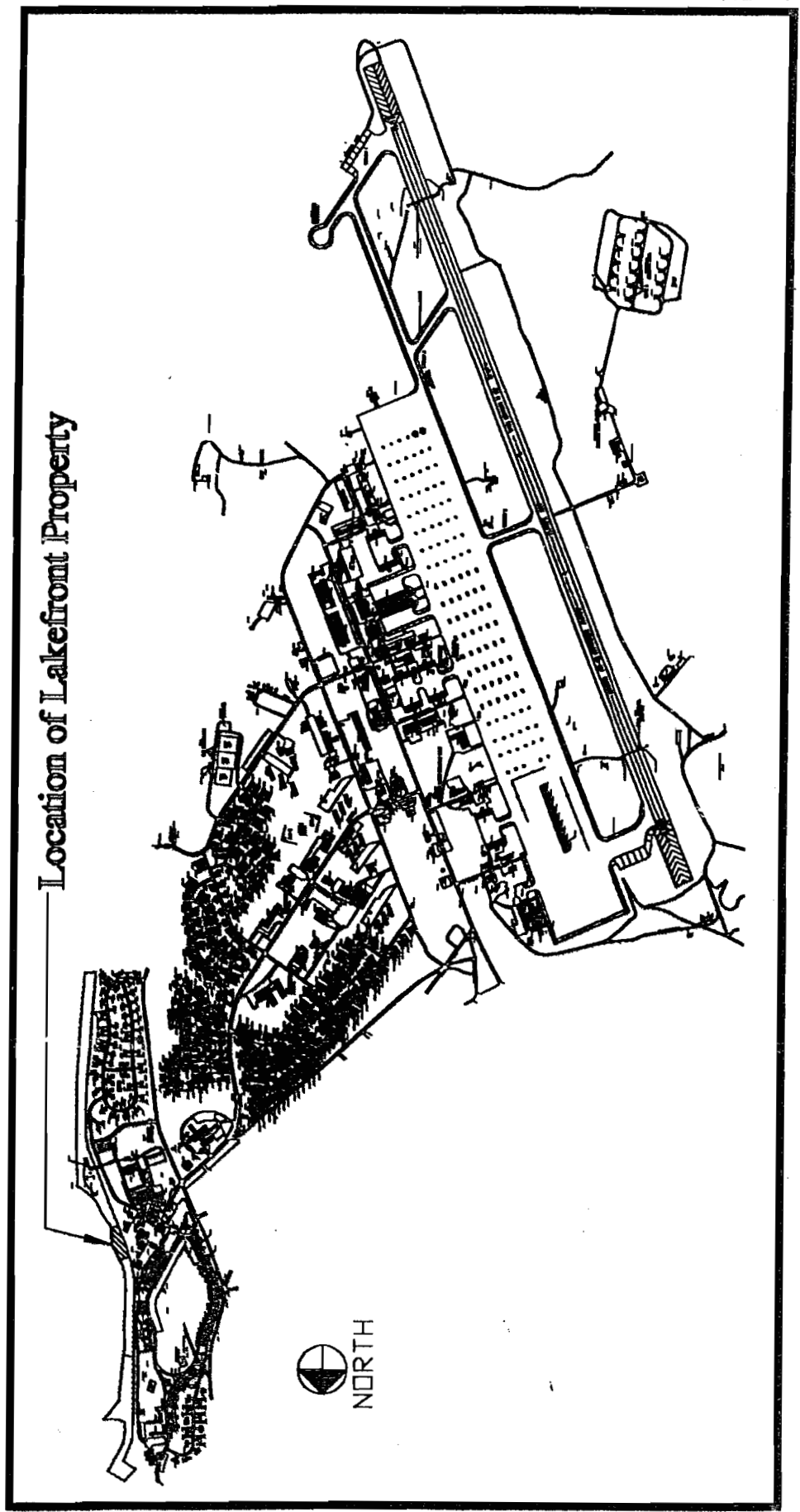
May 7, 2004
Date


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

Attachments:

- 1A-D. Property Maps
2. Environmental Factors Considered
3. Notice of Hazardous Substances Release
4. SS-018/SS-028 ROD Excerpts
- 5A-F. Regulator Comments
6. Air Force Response to Regulator Comments

AutoCAD Doc. LOCAR2.DWG

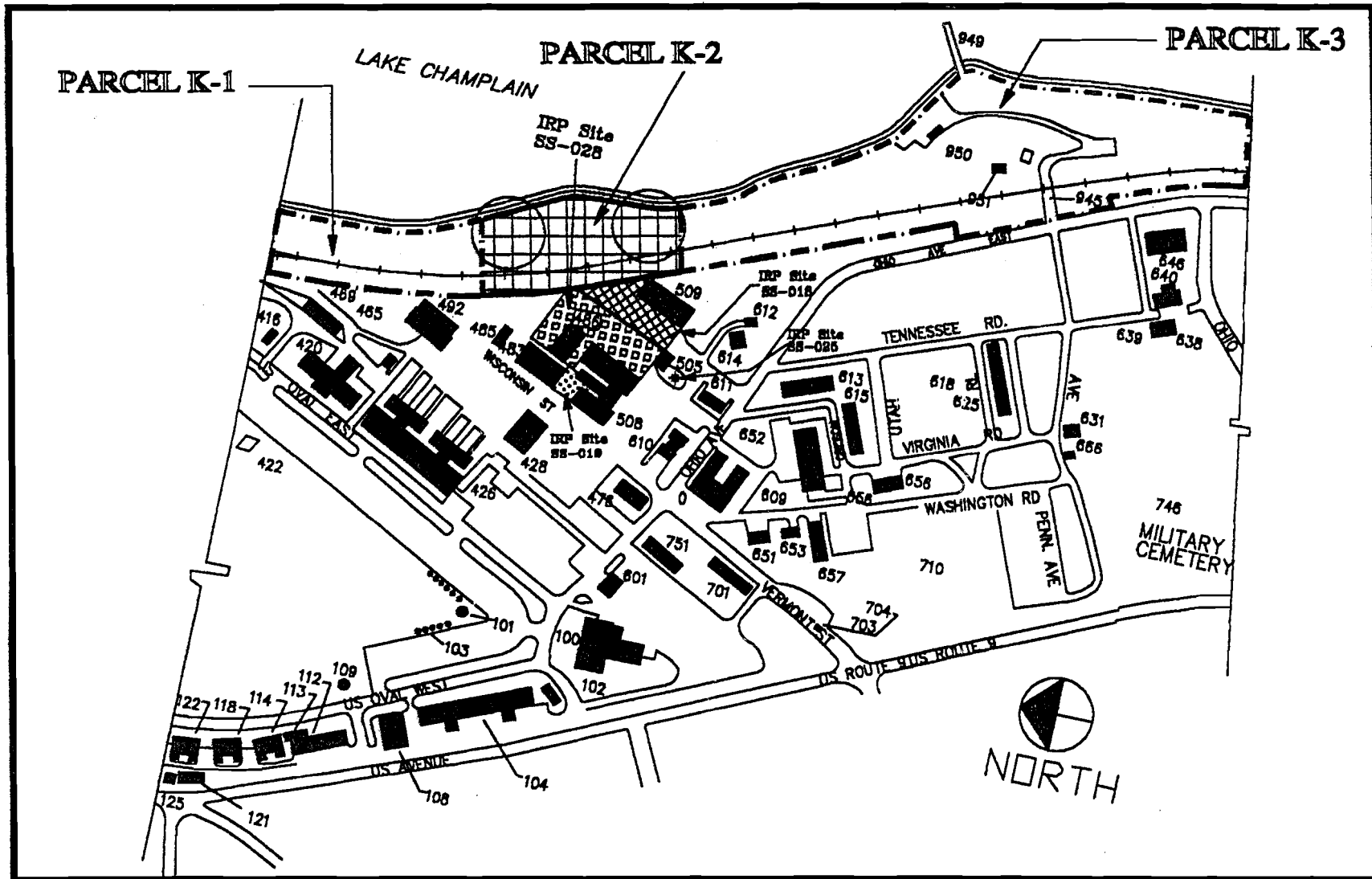


Location of Lakefront Property


Location Plan For Lakefront Property (Parcel K-2)


Scale: 1" = 2500'

Plattsburgh AFB, NY



AutoCAD Doc. LAKEFRONT.DWG

- 

Area of K-2 Lakefront Property
(K-2 Area=2.44 Acres)
- 

Equisetum Palustre,
Marsh Horsetail (State
Listed Rare Species)

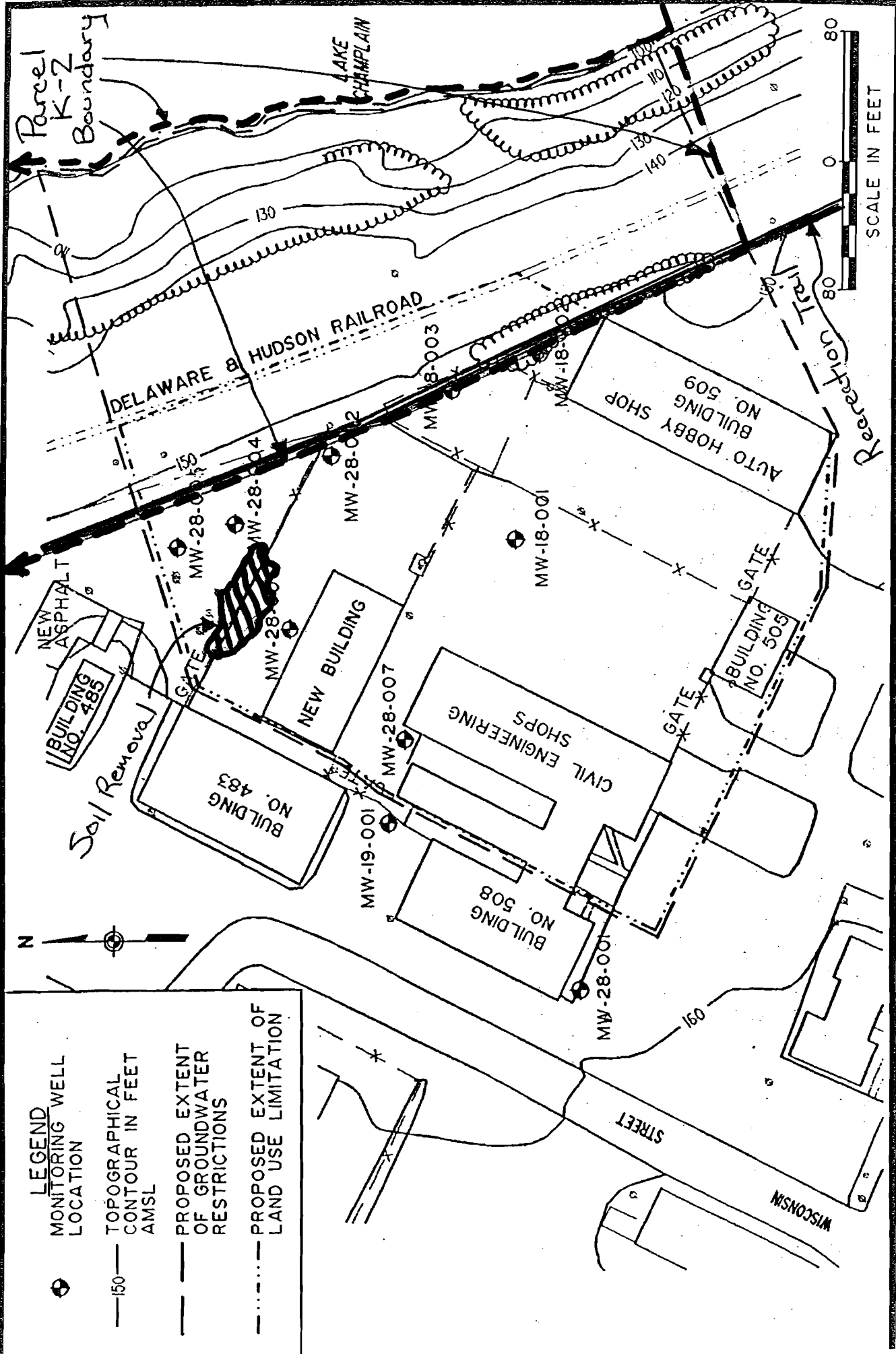
NOTE: Parcels K-1 and K-3 have already been evaluated as part of a previous transfer action and are not included in this evaluation.

Lakefront Property (Parcel K-2)

Scale: 1"=400'

Plattsburgh AFB, NY

35291\CAD\SS028 1:80 11/3/99-2 RAL



SCALE IN FEET

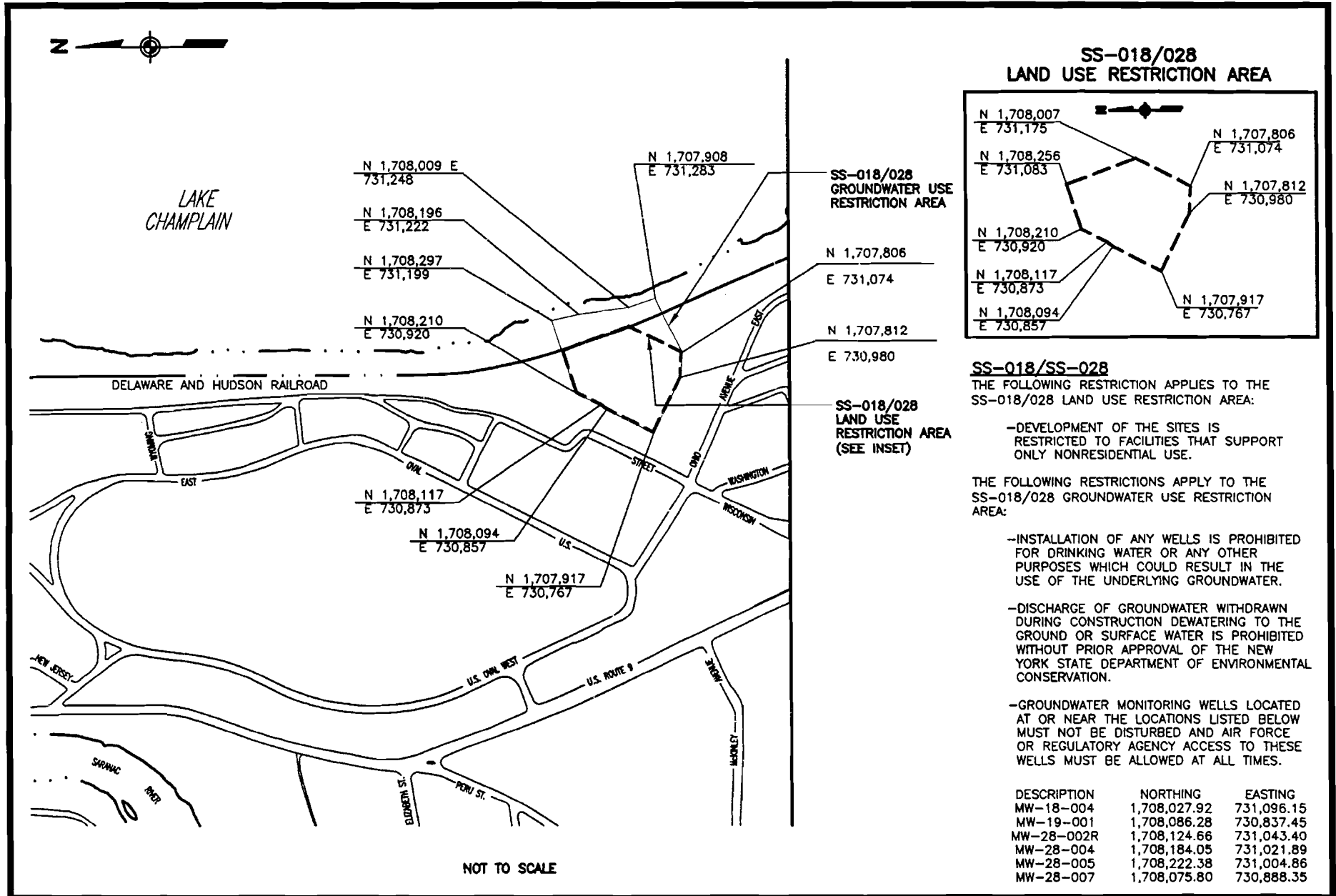
FIGURE 8

SS-018/SS-028 RECOMMENDED ALTERNATIVE EXTENT OF REUSE RESTRICTIONS

- LEGEND**
- MONITORING WELL LOCATION
 - 150— TOPOGRAPHICAL CONTOUR IN FEET AMSL
 - PROPOSED EXTENT OF GROUNDWATER RESTRICTIONS
 - - - - - PROPOSED EXTENT OF LAND USE LIMITATION

AC-12394B

URS
CONSULTANTS, INC.



USE RESTRICTIONS

FIGURE 1

Atch 1D

**Lakefront Area
Parcel K-2**

Deed Restriction or Notification Required?		<i>Environmental Factors Considered</i>
No	Yes	
		<i>Environmental Restoration, Hazardous Substances, Petroleum</i>
	X	Hazardous Substances (Notification)
	X*	Installation Restoration Program (IRP)
	X	Petroleum Products and Derivatives
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 (Housing)
X		Lead-Based Paint (Facilities other than Housing)
X		PCBs
X		Radon
		<i>Other Factors:</i>
X		Air Conformity/Air Permits
X		Energy (Utilities)
	X	Flood plains
	X	Historic Property (Archeological/Native American, Paleontological)
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

* located on adjacent property

Note: Each item identified with an "X" in the yes column is discussed in Section 5.

NOTICE OF HAZARDOUS SUBSTANCES RELEASE

Notice is hereby provided that the information set out below from the Basewide EBS and its Supplement provide notice of hazardous substances that have known to have been released on Parcel K-2 at Plattsburgh Air Force Base, and the dates the release took place. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. Section 9620(h).

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/pounds	Date	Hazardous Waste ID Number (if applicable)	Remarks
Waste Oils, Solvents	Chlorinated Hydrocarbons, PAHs, Metals and MTBE	Unknown	Unknown	Unknown	Unknown	IRP Sites SS-018 and SS-028. 112 cubic yards of soil removed 1999. ROD signed September 2000. Specified groundwater/land use restrictions, groundwater monitoring and 5-year reviews.

N/A: Not Applicable

**SITE SS-018
AUTO HOBBY SHOP
AND SITE SS-028
OPEN STORAGE AREA**

RECORD OF DECISION

***Plattsburgh Air Force Base
Installation Restoration
Program***



prepared for:

**United States Department of The Air Force
Plattsburgh Air Force Base
Plattsburgh, New York**

**Final
August 2000**

DECLARATION FOR THE RECORD OF DECISION

Site Name and Location

Plattsburgh Air Force Base (AFB)
Site SS-018 Auto Hobby Shop, Site SS-028 Open Storage Area
Plattsburgh, New York

Statement of Basis and Purpose

This Record of Decision (ROD) presents a selected remedial alternative for soil and groundwater at sites SS-018 and SS-028 on the Plattsburgh Air Force Base (AFB) in Plattsburgh, New York. It has been developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the Administrative Record for this site, a copy of which is located at the Information Repository at the Feinburg Library on the campus of the State University of New York at Plattsburgh.

The remedy has been selected by the United States Air Force (USAF) in conjunction with the United States Environmental Protection Agency (USEPA) and with the concurrence of the New York State Department of Environmental Conservation (NYSDEC) pursuant to the Federal Facilities Agreement among the parties under Section 117(a) of CERCLA, dated July 10, 1991. A copy of the NYSDEC concurrence letter is included as Appendix C of this ROD.

Assessment of the Site

The Auto Hobby Shop (SS-018) was used by the Plattsburgh AFB from the early 1970s to Base closure, while the Open Storage Area (SS-028) was used by the Plattsburgh AFB from the 1950s to Base closure. Contamination at SS-018 and SS-028 includes polycyclic aromatic

hydrocarbons (PAHs) and metals present in fill materials along the edge of and underneath pavement at the sites, chemicals in soil related to past small spills of fuel and solvents, and volatile organic compounds (VOCs) present in groundwater at concentrations above New York State groundwater standards.

Remedial investigations (RIs) conducted at SS-018 and SS-028 identified possible migration pathways of chemical contaminants to potential receptors. The investigations determined that there is little potential for human contact with contaminated media under the present use conditions (pavement prevents exposure to soil; municipal water supply obviates the use of groundwater). Assessments of risk to human health, conducted as part of the RIs, assumed that in the future, the sites would be used as commercial or industrial areas, and for a recreational bike/walk path. The risk assessments concluded that, for these future uses, there is no unacceptable risk associated with human exposure to site contaminants. Exposure to soil and groundwater under a residential future use scenario was not considered because residential redevelopment is highly unlikely due to: 1) the land use plans developed for the sites (PARC 1995), 2) the immediate proximity of the area to an active rail line, and 3) the development procedure that will be implemented as a result of the historic status of the area. An assessment of ecological risks concluded that there is no significant risk to ecological resources posed by chemical releases at SS-028 and SS-018.

As a result of RI field activities, an area of contaminated soil on SS-028 believed to be the source for the majority of the groundwater contamination was identified and excavated during a removal action. The removal action was initiated in December 1998 to remove contaminated soil believed to be a source of the chlorinated hydrocarbon contamination detected in the groundwater. The action was documented in a Closure Report (URS 1999c), which included a description of the confirmatory soil samples taken to evaluate the adequacy of the soil removal. The removal action is discussed in greater detail in Section 5.4 of this ROD. The excavated material was treated off base by thermal desorption. Consequently, groundwater contamination is expected to decrease to levels below New York State groundwater standards with time.

The response action selected in this ROD is necessary to protect the public health and welfare from releases of hazardous substances into the environment.

Description of the Remedy

Sites SS-018 and SS-028 are two of a number of sites administered under the Plattsburgh AFB IRP. RODs have previously been signed for nine operable units at the base, and additional RODs are planned for other IRP sites. It is intended that the proposed action be the final action for sites SS-018 and SS-028. A removal action conducted from December 1998 through June 1999 at site SS-028 resulted in the removal of contaminated soil that constituted the principal threat wastes at the sites.

The remedy addresses risks from residual contaminants in soil and groundwater by restricting groundwater use and by limiting land uses to those that have limited potential to threaten public health (nonresidential). The following actions are included in the remedy:

- Restriction of site development to facilities that support nonresidential use
- Prohibition of the installation of any wells for drinking water or any other purposes which could result in the use of the underlying groundwater
- Prohibition of discharge of groundwater withdrawn during construction dewatering to the ground or surface water, without prior approval of the NYSDEC
- Periodic monitoring of site groundwater and groundwater seeps for volatile organic compounds and MTBE until groundwater contaminant levels are below current regulatory standards
- In order to determine if the remedy will continue to be protective of human health and the environment in the future, evaluation of the above institutional controls, which will be implemented through lease and deed restrictions, and review of groundwater monitoring data will be undertaken as part of five-year reviews of the remedy in accordance with Section 121(c) of CERCLA.

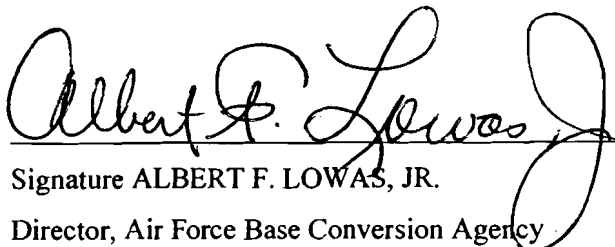
Statutory Determinations


The selected remedy for the SS-018/SS-028 site is protective of human health and the environment, complies with federal and state Applicable or Relevant and Appropriate Requirements, and is cost effective. During the removal action, the remediation goal of removing contaminated soil believed to be the source of chlorinated hydrocarbon contamination detected in the groundwater was achieved. The soil containing contaminants above NYSDEC TAGM HWR-94-4046 thresholds were removed. Resource recovery technologies and treatment technologies were utilized that permanently and significantly reduced the toxicity, mobility, and volume of volatile organic site contaminants. However, polycyclic aromatic hydrocarbon contamination in soil, largely located below pavement, will remain in place untreated. Also, groundwater contaminants will remain above regulatory standards until they are naturally attenuated with time. Because this remedy will result in contaminants remaining on site above levels that allow for unlimited use and unrestricted exposure, reviews according to Section 121(c) of CERCLA will be conducted every five years after initiation of the remedial action, to ensure that the remedy is protective of human health and the environment.

ROD Data Certification Checklist

The following information is included in this ROD. Additional information can be found in the Administrative Record file for this site.

- Chemicals of concern and their respective concentrations (Section 5.0)
- Baseline risk represented by the chemicals of concern (Section 7.0)
- Cleanup levels established for chemicals of concern and the basis for these levels (Tables 1 through 4)
- How source materials constituting principal threats are addressed (Section 4.0)
- Current and reasonably anticipated future land use assumptions, and current and potential future beneficial uses of groundwater used in the baseline risk assessment and ROD (Sections 6.0 and 7.0)
- Potential land and groundwater use that will be available at the site as a result of the Selected Remedy (Section 6.0)
- Estimated annual operation and maintenance (O&M) costs (Section 8.2)
- Key factors that led to selecting the remedy (Section 9.0)

 September 19, 2000
Signature ALBERT F. LOWAS, JR.
Director, Air Force Base Conversion Agency

 Sept. 27, 2000
Signature JEANNE M. FOX
USEPA, Regional Administrator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

02/12/01

Via Facsimile

Mr. Michael D. Sorel, P.E.
BRAC Environmental Coordinator
AFBCA/DA
426 US Oval, Suite 2200
Plattsburgh, New York 12903

Re: Draft Supplemental Environmental Baseline Survey (SEBS) and Finding Of Suitability To Transfer (FOST) for the Lakefront Area (Parcel K-2)

Dear Mr. Sorel:

EPA has reviewed the Draft Supplemental Environmental Baseline Survey (SEBS) and Finding Of Suitability To Transfer (FOST) for the Lakefront Area (Parcel K-2).

General Comments

1. The documents need to state that the public will be notified, within 14 days of the signing of the FOST, of the existence of the FOST. It is requested that a copy of the notification be forwarded to EPA once it is published. Copies of both documents need to be placed in the Administrative Record for Plattsburgh AFB.
2. The involvement of NYSDEC's Spill Response office in the investigation of the MTBE contamination needs to be mentioned in the documents.
3. In accordance with CERCLA 120 h (3) (A) ii, the Air Force will need to provide a covenant in the deed warranting that: (I) all remedial action necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken before the date of such transfer, and (II) any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States. Suitable wording fully describing this needs to be provided in the FOST. Section 4 of the FOST (page 2) and section 5.5.2 of the FOST (last paragraph page 4) make a statement regarding the first part of the covenant (all necessary remedial actions have been taken), but it is not stated that this covenant will be made in the deed to the property. This needs to be rectified because CERCLA states that the covenant needs to be in the deed, not in the FOST. The 2nd part of the covenant (future additional remedial action) is not mentioned in the FOST at all, and needs to be. In addition, please inform the appropriate party(ies) that EPA requests a copy of the deed once the transfer is completed.

4. The word "covenants" is incorrectly used on page 3 of the FOST, after the SS-028 ROD discussion, and should be replaced by "restrictions/notifications" in both places it occurs in the 4th paragraph. The same is true for the last paragraph on page 4 of the FOST regarding disruption of investigations and activities, sec 5.6 of the FOST regarding historic property, and sec 7 of the FOST regarding all of the "deed covenants as addressed above".

5. The property descriptions do not mention any buildings. Are there any buildings on the subject property? If so, they need to be discussed in the documents.

6. A brief description of the IRP program needs to be added to the SEBS (sec 3.2.2) and FOST (sec 5.2).

7. Although it is noted in Section 1.2 of the FOST that other documents and reports are noted in the SEBS, it is not clear why the two lists are not identical. At minimum, the existence of the different list in the FOST should be noted in the SEBS.

Page-Specific Comments – SEBS

- #8 Page 2, section 3.2.2, para 1: Insert "(SS-018 and SS-028)" after "two IRP sites" in the 2nd sentence.
- #9 Page 3, sec 3.3 and FOST, Attachment 2: If groundwater use is restricted, why is drinking water a disclosure factor that does not present a concern (SEBS), and why is it not checked "yes" in Attachment 2 (FOST) restrictions?
- #10 Page 3, sec 3.2.2: The 2nd full sentence in the 1st paragraph needs to be checked. The word "and" between "509" and "containing" makes it appear as though some text may be missing. The same problem occurs on page 3 of the FOST near the end of the SS-028 discussion. Also, the nature of the contamination in the removed soil needs to be described in the text (see also the last sentence of the SS-028 discussion on page 3 of the FOST).
- #11 Page 3, sec 3.4: It seems unlikely that there are no wetlands on the property. This needs to be checked. Also, the FOST (sec 2) states that the property contains several utility easements for sewer and electrical service, yet utilities and septic tanks/sewer systems are listed as factors not impacted or of concern. This needs to be rectified.
- #12 Page 3, sec 3.4.2: Is sensitive habitat present on the property?
- #13 Attach 1B: Site SS-028 appears to be labeled "SS-025" above Parcel K-2.
- #14 Attach 1C: The subject property needs to be demarcated on this map. It would also be useful if the jogging trail and removal area were shown.

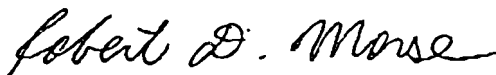
Page-Specific Comments – FOST

- #15 Page 1, sec 2, para 2: The text states that the Lakefront Property was leased to PARC. Is that the case, or was it the City of Plattsburgh? The FOST needs to state whether transfer of K-1 and K-3 has taken place yet, and to what party.
- #16 Page 2, section 5.2.1: This sentence is awkward and needs to be revised. Did the release take place on the subject property, or at sites SS-018 / SS-028?
- #17 Page 4, sec 5.2.1, last para: An explanation/description of the non exclusive access easement is requested.
- #18 Page 4, last para: It appears as though the next to last sentence on the non exclusive easement needs to be deleted due to some type of cut and paste error.
- #19 Page 5, sec 5.4, para 2: The text needs to state the mechanism through which the transferee will be notified of the presence of the state-listed endangered species.
- #20 Page 5, sec 5.6: It is not clear what is meant by "work" in "stop work promptly". More detail is needed in the text (e.g., does "work" mean construction etc.?).
- #21 Page 6, sec 7: The signatory for the FOST needs to be added.
- #22 Attachment 2: See above comments on drinking water quality, energy/utilities, sanitary sewer systems, and wetlands.

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. Also, 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. Quinn, NYSDEC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

FEB 16 2001

Via Facsimile

Mr. Michael D. Sorel, P.E.
BRAC Environmental Coordinator
AFBCA/DA
426 US Oval, Suite 2200
Plattsburgh, New York 12903

Re: Additional Comments, Draft Supplemental Environmental Baseline Survey (SEBS) and Finding Of Suitability To Transfer (FOST) for the Lakefront Area (Parcel K-2)

Dear Mr. Sorel:

Review of recent EPA guidance concerning institutional controls and the transfer of real property revealed that additional information regarding the institutional controls required for Parcel K-2 (the subject property) needs to be submitted to EPA to aid in evaluation of the Finding Of Suitability To Transfer (FOST) for the subject property. The guidance involved, *Institutional Controls and Transfer of Real Property under CERCLA Section 120(h)(3)(A), (B) or (C), Interim Final*, was transmitted via Memorandum from Jim Woolford, Director of EPA's Federal Facilities Restoration and Reuse Office, to EPA Regional Superfund Policy Managers and Regional Counsels on January 6, 2000. A complete copy of the guidance can be downloaded from FFRRO's website at www.epa.gov/swerffrr/brac.htm.

Section 3.0 of the guidance addresses the circumstances under which the guidance applies, and reads as follows:

"The guidance applies in the following situations:

- When EPA approves "operating properly and successfully demonstrations" for ongoing remedies under CERCLA section 120(h)(3)(B). (See Section 7.0 for more information.)
- When EPA evaluates a federal agency's determination under 120(h)(3)(A) that all remedial actions have been taken, such as when commenting on a "finding of suitability of transfer," in the consultative process established by DoD.
- When EPA approves a Covenant Deferral Request under

120 (h)(3)(C)¹ for an early transfer.”

The subject guidance is applicable under CERCLA 120(h)(3)(A), as outlined in the 2nd bullet above, based on the first sentence of the last paragraph on page 4 of the draft FOST (“All removal or remedial actions ... have been met for the property.”).

The introductory (Summary) section of the guidance discusses the basis for the request for additional information, and provides a brief summary of the requirements. It reads, in part, as follows:

“EPA’s evaluation of federal property transfers is contingent on the receipt of information establishing that the institutional controls will be effective in preventing human or environmental exposure to hazardous substances that remain on site above levels which allow unrestricted use. For this reason, this guidance requires that the transferring federal agency demonstrate prior to transfer that certain procedures are in place, or will be put in place, that will provide EPA with sufficient basis for determining that the institutional controls will perform as expected in the future. Such procedures, which are listed in Section 5.0 below, include the means for:

- **Monitoring** the institutional controls’ effectiveness and integrity.
- **Reporting** the results of such monitoring, including notice of any violation or failure of the controls.
- **Enforcing** the institutional controls should such a violation or failure occur.”

Section 5 of the guidance discusses the information needed by EPA, stating that “the information should document that the transferring federal agency will ensure that appropriate actions will be taken if a remedy is compromised.” Information required under Section 5 is as follows:

“At a minimum, EPA should expect to obtain the following information from the transferring federal agency:

- 1) A legal description of the real property or other geographical information sufficient to clearly identify the property where the institutional controls will be implemented.
- 2) A description of the anticipated future use(s) for the parcel.
- 3) Identification of the residual hazard or risk present on the parcel requiring the institutional control. In addition, the specific activities that are prohibited on the parcel should be identified, including prohibitions against certain land use activities that might affect the integrity of the remedy, such as well drilling and construction.
- 4) The specific institutional control language in substantially the same form as it will appear in the transfer document and a description of the legal authority for the

¹For more information, see *EPA Guidance on the Transfer of Federal Property by Deed Before All Necessary Remedial Action Has Been Taken Pursuant to CERCLA Section 120(h)(3)*, June 16, 1998.

implementation of these controls, such as state statutes, regulations, ordinances or other legal authority including case law.

- 5) A statement from the transferring federal agency that, in their best professional judgement, the institutional controls conform or will conform with the legal requirements of the applicable state and/or local jurisdiction. This statement should also explain how the institutional controls will be enforceable against future transferees and successors. Compliance with the institutional control should be enforceable against whoever might have ownership or control of the property. For Base Realignment and Closure properties, the majority of the transfers which EPA reviews, this statement could be included in a memorandum transmitting the final institutional control language for the deed of transfer from a DoD component attorney to the Commanding Officer. The memorandum could state that, based upon a review of the particular state's real estate laws, the component attorney believes that the institutional control is binding in perpetuity and enforceable in state court, and if it is not, he/she will revisit the institutional control or the entire remedy decision. This memorandum could be included in DoD's "operating properly and successfully demonstration" letter to EPA ².
- 6) A description of who will be responsible for monitoring the integrity and effectiveness of the institutional controls and the frequency of monitoring. If this is a party other than the transferring federal agency, the transferring federal agency should provide documentation that the party accepts or will accept the responsibility. The transferring agency should also describe which specific party or office will be responsible for overseeing the institutional controls. The transferring agency might, for example, provide details of the types of assistance that other government agencies will provide in preventing the drilling of drinking water wells as well as the frequency of monitoring to ensure that drilling is not occurring.
- 7) A description of the procedure that will be used to report violations or failures of the institutional controls to the appropriate EPA and/or state regulator, local or tribal government, and the designated party or entity responsible for reporting.
- 8) A description of the procedure that will be used to enforce against violations of an institutional control, an identification of the party or parties that will be responsible for such enforcement, and a description of the legal authority for this enforcement procedure, such as state statutes, regulations, ordinances, or other legal authority including case law.

²This is consistent with DoD's own requirement in their guidance *Responsibility for Additional Environmental Cleanup after Transfer of Real Property*, which states "The DoD component disposal agent will also ensure that appropriate institutional controls and other implementation and enforcement mechanisms, appropriate to the jurisdiction where the property is located, are either in place prior to the transfer or will be put in place by the transferee."

- 9) Assurance that the transferring federal agency will verify maintenance of the institutional control on a periodic basis unless other arrangements have been made. In the latter case, where another party is performing the monitoring function, that party should provide such assurances. In addition, the transferring federal agency must commit to verify the reports on a regular basis in this case.
- 10) A description of the recording requirements in the jurisdiction where the site is located. The transferring agency also must describe the methods it will use to provide notice of the institutional controls at the site to subsequent owners or lessees."

EPA review of the K-2 FOST, in light of the information requirements listed above, revealed that items 4 through 10 were not addressed in the FOST. Furthermore, item # 1 above (legal description / other geographical information) was not adequately addressed in the FOST, as Attachment 1D of the FOST (and the large scale basewide restrictive boundaries map submitted by AFBCA on February 12, 2001) does not appear to accurately reflect the area under groundwater use restriction shown on Attachment 1C of the FOST and in the Record of Decision (ROD) for IRP Sites SS-018/SS-028. Attachment 1C and Figure 8 in the ROD show the area of groundwater restriction to extend all the way to the shore of Lake Champlain. In addition, none of the above-mentioned figures delineate the boundaries of the subject property. Please note that the guidance does not specify that the information requested in items 1 through 10 above be contained in the FOST, although that would appear to be the most obvious method at this point for the subject property, only that it be provided to EPA.

Section 4 of the guidance addresses responsibility for implementation of institutional controls. Please note the following from the first paragraph of Section 4:

"The decision to clean up a site to less than unrestricted use or to otherwise restrict the use of the site must be balanced by the assurance that a system will be in place to monitor and enforce any required institutional controls. This assurance is necessary to ensure the long term effectiveness and permanence of the remedy³. In EPA's view, the transferring federal agency is responsible for ensuring that the institutional controls are implemented. Even if implementation of the institutional controls is delegated in the transfer documents, the ultimate responsibility for monitoring, maintaining, and enforcing the institutional controls remains with the federal agency responsible for cleanup."

- END OF COMMENTS -

I apologize for any inconvenience caused by the submission of these additional comments. Please note, however, that this letter has been submitted prior to your requested due date for comments on

³For more information, see 55 FR section 300.430 (e)(9) (iii)(C)(2).

the SEBS and FOST of February 20, 2001. If you have any questions regarding this letter, please feel free to call me at (212) 637-4331.

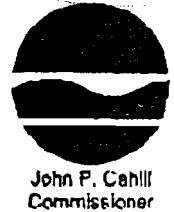
Sincerely,



Robert D. Morse
Remedial Project Manager

cc: J. Quinn, NYSDEC

New York State Department of Environmental Conservation
Division of Environmental Remediation
 Bureau of Eastern Remedial Action, Room 242
 50 Wolf Road, Albany, New York 12233-7010
 Phone: (518) 457-4349 • FAX: (518) 457-4198
 Website: www.dec.state.ny.us



February 20, 2001

Mr. Michael Sorel, P.E.
 AFBCA/DA Plattsburgh
 22 U.S. Oval, Suite 2200
 Plattsburgh, NY 12903

Re: Lakefront Area (Parcel K-2) - Draft FOST
 Plattsburgh Air Force Base, #510003

Dear Mr. Sorel:

The New York State Departments of Health and Environmental Conservation (NYSDEC) have reviewed the Draft Finding of Suitability to Transfer (FOST) for Lakefront Area Parcel K-2 at the former Plattsburgh Air Force Base. It is our opinion that the Air Force Base Conversion Agency (AFBCA) has not taken all necessary actions required prior to property transfer, and therefore a FOST is premature.

As noted in the Draft FOST, a Record of Decision (ROD) was signed by the AFBCA and the United States Environmental Protection Agency (USEPA), with concurrence from the NYSDEC, which requires certain actions to address contamination at property referred to as Installation Restoration Program (IRP) Sites SS-018 and SS-028. As further noted in the FOST, these required actions include: restriction of site development to facilities that support nonresidential use; prohibition on the installation of wells for drinking water or other purposes which could result in use of the underlying groundwater; and prohibition on the discharge of site groundwater without prior regulator approval. As noted on page 3 of the ROD, which is included in the FOST as Attachment 4, the above restrictions on property are also known as *Institutional Controls* (ICs).

By comparing the Draft FOST Attachment 1B to Attachment 1C, it appears that part of the Lakefront Parcel K-2 is within the boundary of the area requiring ICs by the SS-018/028 ROD. This conclusion is supported by the text of the FOST, which outlines certain restrictions to be placed in the property deed upon transfer.

In January 2000, the USEPA issued a document titled Institutional Controls and Transfer of Real Property under CERCLA Section 120(h)(3)(A), (B) or (C) (Interim Final Guidance.) The document explains that, "EPA's evaluation of federal property transfers is contingent on the receipt of information establishing that the institutional controls will be effective in preventing human or environmental exposure to hazardous substances that remain on site above levels which allow unrestricted use. For this reason, this guidance requires that the transferring federal agency demonstrate prior to transfer that certain procedures are in place, or will be put in place, that will provide EPA with sufficient basis for determining that the institutional controls will perform as expected in the future."

RECEIVED

FEB 20 2001

AFBCA/DA PBG

Mike
 David Bar Co

The information required by the EIA, as detailed in Section 5.0 of the guidance document, is substantially similar to the information the NYSDEC requested be included in the ROD for SS-018/028. (See NYSDEC's April 19, 2000 letter on the Draft ROD.) While the AFBCA provided a partial fulfillment of the state's request for information, the AFBCA also responded that providing the level of detail requested by the NYSDEC regarding certain aspects of the ICs was "premature." The NYSDEC accepted this response, but conditioned our concurrence of the ROD "upon the United States Department of Defense taking the necessary steps to implement proper and effective deed restrictions as well as a deed restriction enforcement plan prior to the transfer of these properties to any party other than the Federal government." Submittal for review of the information detailed in Section 5.0 of the EPA document, prior to property transfer, may satisfactorily complete the "necessary steps" upon which our concurrence of the ROD is conditioned.

Therefore, it is the NYSDEC's position that the development and submittal of information detailed in Section 5.0 of the EPA document is a necessary action prior to transfer of this property. And further, as this information has not yet been developed and submitted for review, a POST is premature.

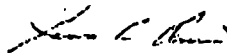
In addition to requiring the submittal of detailed information on ICs prior to property transfer, as discussed above, the Institutional Controls and Transfer of Real Property under CERCLA Section 120(h)(3)(A), (B) or (C) document may indicate that Institutional controls selected as remedy under the IRP may need to obtain an "operating properly and successfully" determination from the USEPA as a precondition to property transfer in accordance with CERCLA Section 120(h). Section 2.0 of the document (Purpose and Scope of the Guidance) reads:

"This guidance establishes criteria for EIA to evaluate the effectiveness of institutional controls that are part of a remedy or are a sole remedy for property to be transferred subject to CERCLA section 120(h)(3)(A), (B), or (C). Accordingly, this institutional control guidance provides guidelines applicable to property transfers in general and, more specifically, to support 'operating properly and successfully' determinations' under CERCLA section 120(h)(3)(B)."

The NYSDEC requests that the issue of an "operating properly and successfully" determination for the remedy required by the SS-018/028 ROD be addressed in any revised FOST for this parcel, and that a discussion on the applicability of "operating properly and successfully" determinations be included in the respective FOST for any property transfer that includes property for which a remedy has been selected and recorded in a ROD.

The NYSDEC appreciates that transfer and reuse of Base property is important to the Plattsburgh community. We believe that by clarifying and resolving, at this time, those issues which may be a common component of this and future property transfers, the ultimate transfer of Base property will be positively affected. If you should have any questions, please contact me at (518) 457-3976 or jaquinn@gw.dec.state.ny.us.

Sincerely,



James A. Quinn
Bureau of Eastern Remedial Action
Division of Environmental Remediation

c: R. Morse - USEPA
R. Fedigan - NYSDOH
K. Wagner - NYSDEC

To: Dave Far: orth@PLATTSBURGH@AFBDA.OL
From: Stephen Gagnier@PLATTSBURGH@AFBDA.OL3
Originated by: "James Lister" <jblister@gw.dec.state.ny.us>
Cc: Michael Sorel@PLATTSBURGH@AFBDA.OL3
Subject: fwd: FOST Parcel K-2
Attachment:
Date: 3/18/2004 12:50 PM

----- Original Text -----

From: "James Lister" <jblister@gw.dec.state.ny.us>, on 3/18/2004 11:18 AM:
To: Stephen Gagnier@PLATTSBURGH@AFBDA.OL3
Cc:
ISMTP@ADMIN@AFBDA.HDQ[<MORSE.BOB@epamail.epa.gov>],ISMTP@ADMIN@AFBDA.HDQ[<rgm11@health.state.ny.us>]

Steve, NYS has reviewed the FOST and SEBS for Parcel K-2 with the only comment that there needs to be language included in the FOST that specifies that prior to any structure being erected on the parcel the potential for vapor intrusion must be evaluated and if it is determined that a potential human health impact is possible, then mitigation of the problem must occur.

To: ddn[jblist@gw.dec.state.ny.us]
From: Dave Farnsworth@PLATTSBURGH@AFBDA.OL3
Cc: ISMTP@ADMIN@AFBDA.HDQ [<MORSE.BOB@epamail.epa.gov>], Michael Sorel@PLATTSBURGH@AFBDA.OL3
Subject: Revision to Parcel K-2 FOST
Attachment: K2 FOST REVISED PG5 032604.DOC, BEYOND.RTF
Date: 3/26/2004 8:19 AM

Jim:

In response to the NYS (3/18/2004 email) comment on the Revised Draft FOST for Parcel K-2, Lakefront Area; we have added text to Section 5.2.2, on page 5, of the FOST requiring vapor intrusion evaluation for any structure constructed in the contaminated groundwater area of the parcel. Attached is is page 5 from the FOST, the additional text is underlined/italicized. Since there were no other comments; if this additional text is ok, we'd like to proceed with the Final FOST. Thanks.

Dave

To: Dave Farnsworth@PLATTSBURGH@AFBDA.OL3
From: "James Lister" <jblister@gw.dec.state.ny.us>
Cc: ISMTP@ADMIN@AFBDA.HDQ [<MORSE.BOB@epamail.epa.gov>],
ISMTP@ADMIN@AFBDA.HDQ [<rgm11@health.state.ny.us>],
ISMTP@ADMIN@AFBDA.HDQ [<rjf01@health.state.ny.us>]
Subject: Re: Fwd: Revision to Parcel K-2 FOST
Attachment: attach1, K2 FOST REVISED PG5 032604.DOC
Date: 3/26/2004 2:00 PM

Dave, looks good to us. Jim

To: Dave Farnsworth@PLATTSBURGH@AFBDA.OL3
From: <Morse.Bob@epamail.epa.gov>
Cc: Michael Sorel@PLATTSBURGH@AFBDA.OL3
Subject: Re: fwd: FOST Parcel K-2
Attachment:
Date: 3/22/2004 5:10 PM

Dave,

EPA has no comments on the K-2 FOST.

Bob

dave.farnsworth@afropa.pentagon.af.mil (Dave Farnsworth)
To: Bob Morse/R2/USEPA/US@EPA
cc: michael.sorel@afropa.pentagon.af.mil (Michael Sorel)
03/18/04 05:27 PM Subject: fwd: FOST Parcel K-2
Please respond to dave.farnsworth

**PLATTSBURGH AIR FORCE BASE
FINDING OF SUITABILITY TO TRANSFER (FOST)
PARCEL K-2, LAKEFRONT AREA**

AFRPA RESPONSE TO REGULATORY COMMENTS

1. The United States Environmental Protection Agency (USEPA) submitted comments (See February 12, 2001, USEPA letter, Attachment 5A to the FOST.) in response to the January 2001 Draft Finding of Suitability to Transfer (FOST) and Draft Supplemental Environmental Baseline Survey (SEBS). USEPA comments are addressed as follows:

a. Comment #1, public notification: AFRPA Model FOST and guidance does not require that the SEBS or the FOST discuss the public notification procedures. Public notification will be provided in the local newspaper, within 14 days of the signing of the FOST; a copy of the public notification document will be provided to USEPA. The SEBS and FOST will be placed in the Administrative Record for Plattsburgh Air Force Base (AFB) after the documents are signed.

b. Comment #2: Discussion detailing New York State Environmental Conservation's (NYSDEC) Region 5 Spill Response Office involvement in the Methyl tert-butyl ether (MTBE) contamination investigation has been added to the discussion of IRP Site SS-028 in Section 3.2.2 of the SEBS and Section 5.2.1 of the FOST.

c. Comment #3, CERCLA 120h(3): Missing text pertaining to placing a covenant in the deed and the full requirements of that covenant has been added to Sections 5.1 and 5.2.1 of the FOST.

d. Comment #4, "covenants": The word "covenants" is used per Model FOST language for these sections.

e. Comment #5: There are no buildings on this property. Specific text indicating there are no buildings has been added to both the SEBS and FOST.

f. Comment #6: Description of the IRP program does not appear necessary and is not required by the AFRPA Model FOST and guidance.

g. Comment #7: the list of documents reviewed has been updated in both the SEBS and FOST.

h. Comment #8, SEBS Section 3.2.2: "(SS-018 and SS-028)" has been added to the second sentence.

i. Comment #9, SEBS Section 3.3: Discussion of drinking water has been added to the SEBS and FOST and checked "yes" in FOST Attachment 2.

j. Comment #10, SEBS Section 3.2.2, discussion of IRP Site SS-028: The word “and” has been deleted from the discussion of IRP Site SS-028 in Section 3.2.2 of the SEBS and Section 5.2.1 of the FOST. In addition, additional text has been added to the discussion of the removal action.

k. Comment #11, SEBS Section 3.4: Per the Environmental Impact Statement (EIS) (See Figure 3.4.8 on page 3-120.), there are no wetlands on the property. Utility easements are not discussed further, as there are no environmental issues or concerns associated with utility easements that would require a deed restriction or notification.

l. Comment #12, SEBS Section 3.4.2: The area containing the state-listed plant species is a sensitive habitat. Additional text has been added to clarify this.

m. Comment #13, SEBS and FOST Atch 1B: All IRP Site labeling has been checked and appears correct.

n. Comment #14, SEBS Atch 1C: Parcel K-2 has been demarcated in Atch 1C. The recreation trail and SS-028 soil removal area are also shown.

o. Comment #15, FOST Section 2: The lakefront property has been leased to the City of Plattsburgh. Text in Section 2 has been revised. Discussion of property transfer status of Parcels K-1 and K-3 has also been updated.

p. Comment #16, FOST Section 5.2.1: The first sentence of FOST Section 5.2.1 is standard language per the Model FOST. IRP Sites SS-018 and SS-028 are located along the west edge of Parcel K-2. Although these IRP Sites are located mostly outside of Parcel K-2, as shown on Atch 1B to the FOST; reuse restrictions specified in the Record of Decision for IRP Sites SS-018 and SS-028 extend east of the IRP Sites (across Parcel K-2) to Lake Champlain and are shown on Atch 1C of the FOST.

q. Comment 17, FOST Section 5.2.1: The text specifying a nonexclusive easement is in accordance with the Model FOST language for IRP Sites with long-term monitoring or ongoing “Post ROD” activities. An example of deed language requiring right of access is as follows:

“The Grantor reserves a right of access to any and all portions of the herein described tracts of land for purposes of environmental investigation, remediation, or other corrective action. This reservation includes the right of access to and uses of, to the extent permitted by law, available utilities at reasonable cost to the Grantor. These rights shall be exercisable in any case in which a remedial action, response action, or corrective action is found to be necessary after the date of conveyance of the herein described tracts of land, or such access is necessary to carry out a remedial action, response action, or corrective action on adjoining property. Pursuant to this reservation, the United States and its officers, agents, employees, contractors, and subcontractors shall have the right (upon reasonable notice to the Grantee or the then owner and any authorized occupant of the property) to enter upon the herein described tracts of land and conduct

investigations and surveys, to include drillings, testpitting, borings, data and/or record compilation, and other activities related to environmental investigation, and to carry out remedial or removal actions as required or necessary under applicable authorities, including, but not limited to, monitoring wells, pumping wells, and treatment facilities.”

r. Comment #18, FOST Section 5.2.2: Text at bottom of Section 5.2.2 has been corrected (and relocated to Section 5.2.1).

s. Comment #19, FOST Section 5.4: The transferee will be notified of the presence of the state-listed endangered species in the deed. Text has been modified to reflect this.

t. Comment #20, FOST Section 5.6: Clarifying text has been inserted.

u. Comment #21, FOST Section 7: Signatory has been added.

v. Comment #22, FOST Atch 2: See item “k” (response to comment #11) above.

2. On February 16, 2001, the USEPA submitted additional comments (See February 16, 2001, USEPA letter, Atch 5B to the FOST.) The additional comments pertained to management and enforcement of Land Use Controls/Institutional Controls (LUC/ICs) and requested additional information regarding the LUC/ICs associated with IRP Sites SS-018 and SS-028 and affecting Parcel K-2. Since the submission of this FOST, numerous meetings have been held with both NYSDEC and USEPA regarding the management of LUC/ICs. FOST text pertaining to LUC/ICs has been revised and expanded. In addition, a LUC/IC Management Plan for Plattsburgh AFB with additional information pertaining to LUC/IC implementation, monitoring, and enforcement has been developed and provided to USEPA and NYSDEC.

3. The NYSDEC submitted comments (See February 20, 2001, NYSDEC letter, Atch 5C to the FOST.) in response to the January 2001 Draft FOST and Draft SEBS. NYSDEC indicated that a FOST was premature due to unresolved issues pertaining to the management of LUC/ICs associated with IRP Sites SS-018 and SS-028 and affecting Parcel K-2. FOST text pertaining to LUC/ICs has been revised and expanded. In addition, a LUC/IC Management Plan for Plattsburgh AFB with additional information pertaining to LUC/IC implementation, monitoring, and enforcement has been developed and provided to the NYSDEC and the USEPA.

4. NYSDEC commented (See March 18, 2004, NYSDEC e-mail, Atch 5D to the FOST.) in response to the February 2004 Revised Draft FOST and Revised Draft SEBS. NYSDEC requested language specifying the requirement that vapor intrusion evaluation and mitigation (if necessary) be included in the FOST. Additional text has been added to Section 5.2.1, requiring vapor intrusion evaluation for any structure constructed in the contaminated groundwater area of the parcel, and coordinated with NYSDEC (Atch 5E).

5. USEPA indicated (See March 22, 2004, USEPA e-mail, Atch 5F to the FOST.) that it had no comments on the Parcel K-2 FOST.

**FINAL SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY
LAKEFRONT AREA
PARCEL K-2
Former Plattsburgh Air Force Base, New York
May 2004**

CHAPTER 1. PURPOSE OF THE SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY

1.1 Introduction. This Supplemental Environmental Baseline Survey (SEBS) has been prepared to document changes in the environmental conditions of Parcel K-2, the Lakefront Area, since publication of the Plattsburgh AFB Basewide Environmental Baseline Survey (EBS).

1.2 Description. The Lakefront Area (Parcel K-2) totals 2.44 acres along the base's northeast boundary and consists of approximately 500 feet of Lake Champlain shoreline and extends west across the existing Canadian Pacific Railroad. The property includes a 10-foot wide asphalt recreation trail along the west edge and a 4-foot high chain link fence along the trail's east edge (separating it from the railroad tracks). There are no buildings present on the property. The property also includes several utility easements (for sewer and electrical service) and a 100-foot wide right-of-way for the Canadian Pacific Railroad. The property is shown in Attachments 1A through 1C.

Note: The entire Lakefront Area of the former Plattsburgh AFB consists of approximately 8,000 feet of Lake Champlain Shoreline of which Parcel K-2 is a part. The Lakefront Areas north and south of Parcel K-2 are designated as Parcels K-1 and K-3, respectively and were previously evaluated (See Section 2.2 below.).

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. A VSI was conducted and additional data collected in November 1996, June 1999, November 2000, and February 2004 to verify the condition of the property.

2.2 Description of Documents Reviewed. A list of documentation reviewed is provided in the Plattsburgh AFB Basewide EBS. Additional documentation used included the Final SEBS and Final Finding of Suitability to Transfer (FOST), dated October and November 1999, respectively, for the Lakefront Area Parcels K-1 and K-3; the February 1994 Final Habitat Assessment and Wetland Delineation Report performed by URS Consultants, Inc.; the 1994 Habitat and Shoreline [Threatened and Endangered Species] Survey (dated June 26, 1995) performed by the New York Natural Heritage Program; the November 1995 Final Environmental Impact Statement (FEIS) for the Disposal and Reuse of Plattsburgh AFB; the January 1996 Final Background Surface Soil &

Groundwater Survey performed by URS Consultants, Inc.; the April 1995 Archeological Survey Report of Plattsburgh Air Force Base performed by the US Army Construction Engineering Research Laboratories/Technical Assistance Center (USACERL/TAC); the August 2000 Final Record of Decision (ROD) for IRP Sites SS-018 and SS-028; the May 1997 Base Realignment and Closure Cleanup Plan (BCP); the May 2000 Environmental Assessment of Alternative Land Uses (Supplement to the November 1995 FEIS) prepared by Tetra Tech, Inc.; the October 2002 Land Use Control/Institutional Control Management Plan for Former Plattsburgh AFB; the July 2003 Semiannual Monitoring Report for the April 2003 Groundwater Sampling for Sites SS-018 and SS-028 prepared by URS Consultants, Inc.; the Final Finding of Suitability to Lease (FOSL) for the Lakefront Area, dated January 1997.

2.3 Inspections of Property Conducted. VSIs were conducted November 14, 1996; June 23, 1999; November 8, 2000; and February 10, 2004 to determine if any change in property condition had occurred subsequent to the Basewide EBS being published. 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 THE LAKEFRONT AREA

3.1 Environmental Setting. A description of the area's climate, topography, hydrology, geology, and utilities is contained in Section 3.2 of the Plattsburgh AFB Basewide EBS.

3.2 Property Categorization Factors. Environmental factors which are not applicable to this property include ordnance, medical/biohazardous wastes, oil/water separators, storage tanks, and radioactive/mixed wastes. Applicable environmental factors are discussed below.

3.2.1 Hazardous Substances and Petroleum Spills/Release Incidents. No hazardous substances are known to have been stored on this property. Although there are no spills listed in the Basewide EBS associated with this property, contamination is present on the property and is discussed further in Section 3.2.2 below.

3.2.2. Installation Restoration Program (IRP) Sites. IRP sites are shown in Figure 3-7 and discussed in Appendix D of the Basewide EBS. There are two IRP Sites (SS-018 and SS-028) located along the west edge of Parcel K-2. There are two IRP Sites (SS-019 and ST-025) located on adjacent property west of Parcel K-2). The adjacent IRP Sites are shown (Atch 1B) and discussed in the Finding of Suitability to Transfer for the property (Parcel K-2).

SS-018 is the former Auto Hobby Shop (Building 509). A revised draft final Remedial Investigation (RI) report was completed April 1996. Contaminants identified in the soil, during the RI, include one (1) volatile and eight (8) semivolatile organic compounds (polycyclic aromatic hydrocarbons [PAHs]), two (2) pesticides, twelve (12) inorganics, and sixteen (16) metals. In addition, volatile organic compounds, exceeding Applicable or Relevant and Appropriate Requirements (ARARs), have been detected in the groundwater. Additional groundwater investigation and additional human health risk assessments have been performed as

part of the Remedial Investigation of IRP SS-028 (See separate discussion below.), which is immediately to the north.

SS-028 is the Civil Engineering Open Storage Area next to Building 508 and adjacent to Site SS-018. A Remedial Investigation (RI) was completed in 1999. The RI included soil and groundwater sampling from 27 boring locations and six (6) monitoring wells to delineate the extent of chlorinated hydrocarbons in the groundwater. The RI also included a human health risk assessment and a screening level ecological risk assessment that incorporates data collected from remedial activities at IRP Sites SS-018 and SS-019. The RI indicated groundwater contaminated with chlorinated hydrocarbons (up to 43 parts per billion [ppb]) exists in several locations within Sites SS-018 and SS-028. Methyl tert-butyl ether (MTBE), an additive to unleaded fuel, was detected at five monitoring well locations, with the highest concentration (430 ppb) occurring at MW-28-007. Additional groundwater sampling was conducted, during 1999 and 2000, in consultation with NYSDEC Region 5, Bureau of Spill Prevention and Response, to further investigate the MTBE groundwater contamination. The investigation confirmed presence of MTBE on site, but did not find MTBE in three monitoring wells located upgradient of the site. The RI also indicates surface soil contamination to the north and west of Building 509 containing PAHs totaling up to 141,000 ppb. As a result of the RI, a removal action was performed in December 1998 to remove a source of the groundwater chlorinated hydrocarbon contamination; approximately 112 cubic yards of soil (southeast of Building 485) was removed (A closure report has been completed and regulatory comments received.).

A Record of Decision for IRP Sites SS-018 and SS-028 was signed September 2000. The selected remedy includes restriction of land use to nonresidential use (See Attachment 1C.); prohibition of the installation of any wells for drinking water or any other purposes that could result in the use of the underlying groundwater; prohibition of discharge of groundwater withdrawn during construction dewatering to the ground or surface water, without prior approval of the NYSDEC; periodic monitoring of site groundwater and groundwater seeps for volatile organic compounds (VOCs) and MBTE until groundwater contaminant levels fall below current regulatory standards; and five-year reviews of the remedy in accordance with Section 121(c) of CERCLA. Groundwater sampling and monitoring for VOCs and MTBE have been conducted semiannually sine May 2001. Chlorinated hydrocarbons have been detected at up to 10.7 ppb); MTBE has been detected at up to 529 ppb. (No other VOCs have been detected.)

3.2.3 Pesticides. Pesticides were applied in accordance with manufacturer's guidance, and no release above action levels is known to have occurred at this site, and no threat is posed to human health or the environment. No pesticides are known to have been stored on this property. Chapter 3, paragraph 3.3.5, and Table 3-2 of the Basewide EBS should be referred to for a further description of the pesticides which may have been used in this area.

3.3 Disclosure Factors. Disclosure factors which are adequately described in the Basewide EBS and do not pose a concern to this property include indoor air quality, polychlorinated biphenyls (PCBs), lead-based paint, and radon. Applicable disclosure factors are discussed below.

3.3.1 Asbestos-Containing Material. There is no known Asbestos-Containing Material (ACM) present on this property. However, ACM, such as transite pipes or pipes wrapped with asbestos insulation, may be found in or on utility pipelines located on the property. ACM associated with utility pipelines below ground does not pose a threat to human health or environment as long as it is not disturbed, or if it is disturbed, proper care is taken to manage and dispose of it. Utility pipelines below the ground have not been inspected. In addition, ACM, which was commonly used in building materials, may be located at building demolition locations. Based upon an inspection of the property and a review of the environmental baseline survey reports, no such locations are specifically known at this base. No CERCLA remedial action is required at this time. However, it is possible that there are undiscovered locations where demolition debris may be found by the property recipient or subsequent transferees during ground disturbance activities.

3.3.2 Drinking Water Quality. Groundwater contamination is present on the property and is discussed in Section 3.2.2 above. Potable water is not present on the property but is available via the city-operated water supply and distribution system, on the property immediately to the west.

3.4 Other Factors/Resources. Other factors or resources which could impact or be impacted, but are not present on this property or have no environmental impacts, include Air Conformity/Air Permits, Energy (Utilities), Hazardous Waste Management (by Transferee), Occupational Safety and Health Administration, Outdoor Air Quality, Wetlands, Prime/Unique Farmlands, Septic Tanks/Sanitary Sewer Systems, and Solid Waste. Other factors present in the property are discussed below.

3.4.1 Flood Plains. The immediate shoreline area on the east edge of the property is located within a 100-year flood plain.

3.4.2 Sensitive Habitat/Threatened or Endangered Species. No Federal listed threatened or endangered species are known to exist on Plattsburgh AFB; however, a sensitive habitat containing one state-listed plant species has been identified on the property. According to the 1994 Habitat and Shoreline Survey, several populations of marsh horsetail (*Equisetum palustre*) were found along the shoreline on the property.

3.4.3 Transportation (Railroad). An active railroad (operated by the Canadian Pacific Railroad) passes through the Lakefront Area. No contamination or other concerns were noted during the VSI.

3.4.4 Historic Property (Archeological/Native American, Paleontological). An Archeological Survey Report for Plattsburgh Air Force Base (including the Lake Champlain Shoreline) was completed in 1995. According to the report: "Due to Plattsburgh's role in the War of 1812 and the tendency for Native Americans to locate sites near major water sources, the shoreline was considered to have high to moderate potential for containing both prehistoric and historic cultural resources. During a pedestrian investigation of the shoreline, it was determined that severe erosion and disturbances had occurred and are still occurring; therefore, the potential for site preservation is very low. Currently, there are logs and railroad ties used as rip rap to stabilize the bank. Neither prehistoric nor historic cultural resources were located."

CHAPTER 4. PROPERTY TRANSFER CATEGORY

Based on a review of the Basewide EBS and a VSI of the property, Parcel K-2 is considered Department of Defense Environmental Condition Category 4. Category 4 areas are those where release, disposal, and/or migration of hazardous substances have occurred, and all remedial actions necessary to protect human health and the environment have been taken. The property is considered Category 4 because of contamination present that is associated with IRP Sites SS-018 and SS-028. The condition of the property has changed from a Category 7 as a result of the completion of the Record of Decision for IRP Sites SS-018 and SS-028.

CHAPTER 5. CERTIFICATION

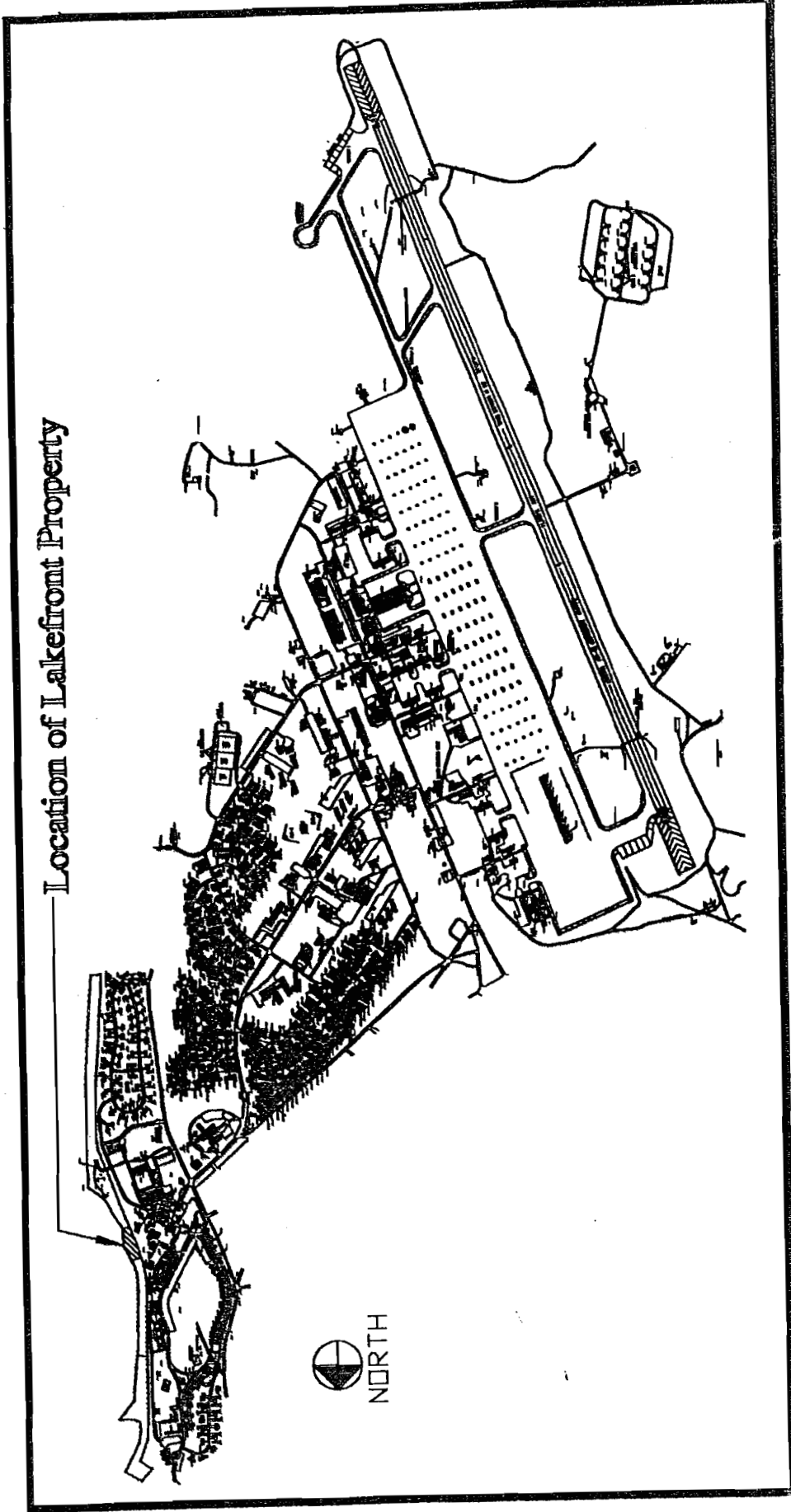
I certify that the property conditions stated in this report are based on a thorough review of available records, visual inspections, and sampling and analysis as noted, and are true and correct to the best of my knowledge and belief.



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

5.3.04
Date

Attachment:
1A-C. Property Maps

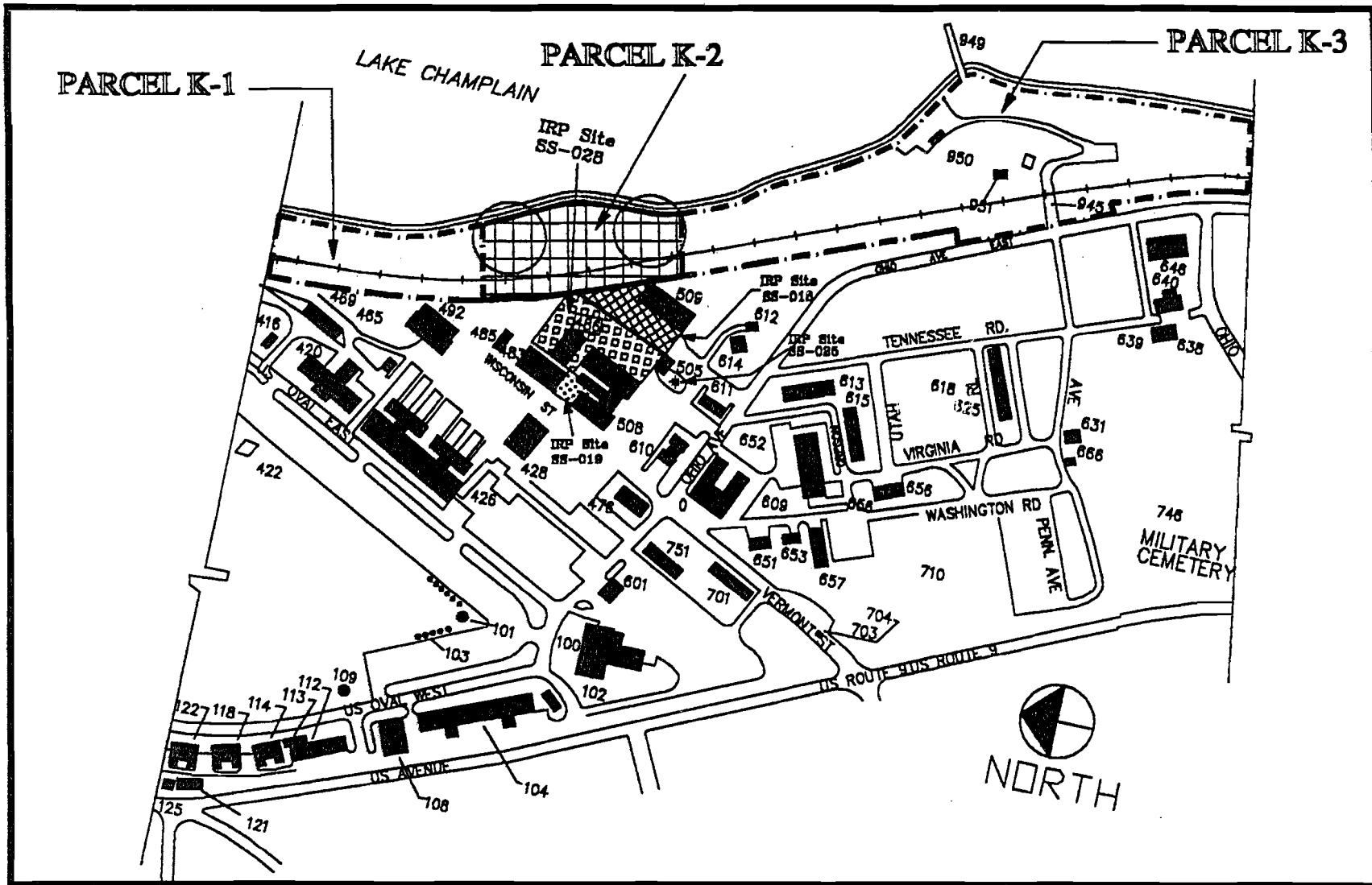


Location Plan For Lakefront Property

(Parcel K-2)

Plattsburgh AFB, NY

Scale: 1" = 2500'



AutoCAD Doc. LAKFRONTA.Dwg



Area of K-2 Lakefront Property
(K-2 Area=2.44 Acres)



Equisetum Palustre,
Marsh Horsetail (State
Listed Rare Species)

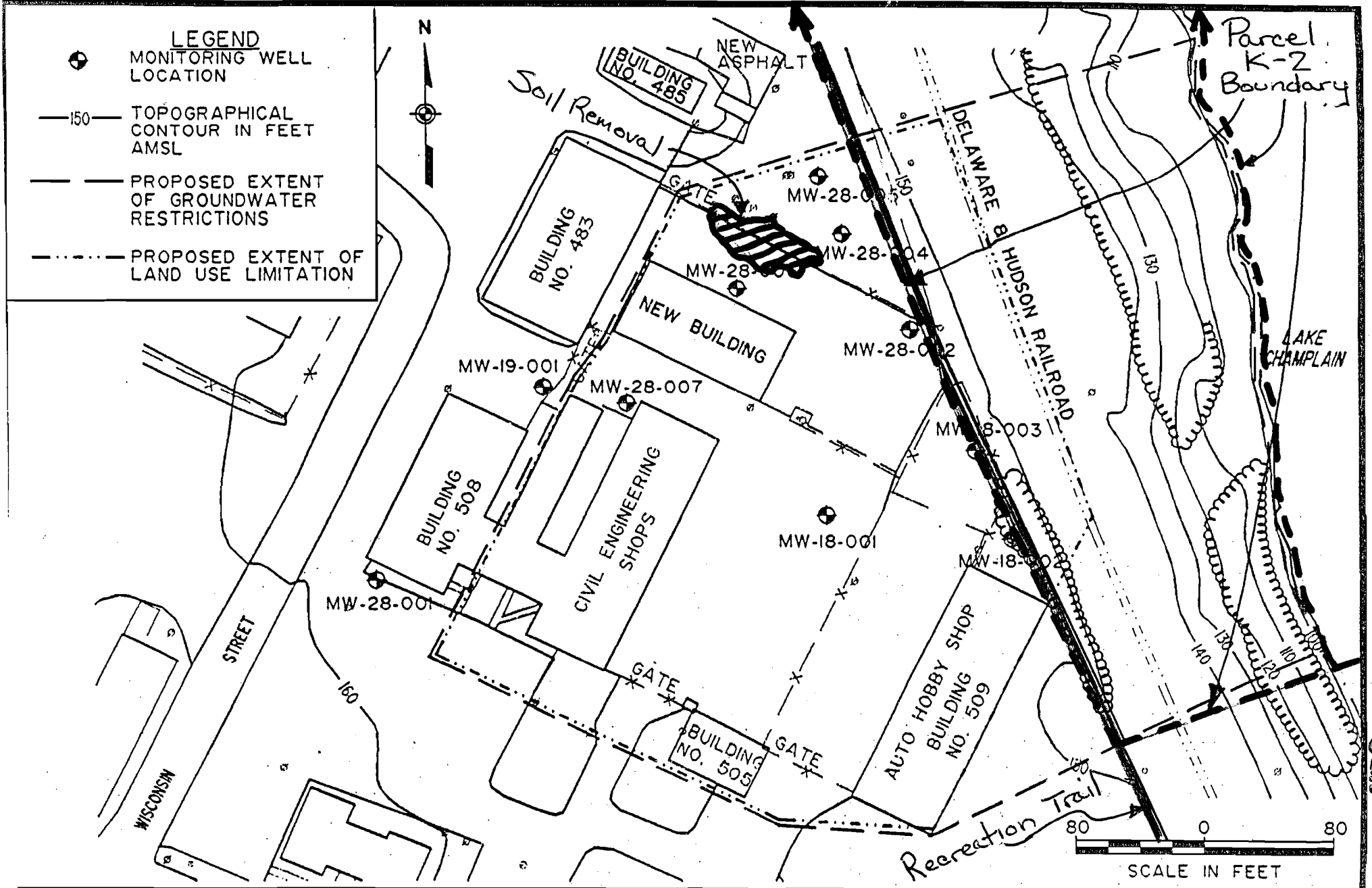
NOTE: Parcels K-1 and K-3 have already been evaluated as part of a previous transfer action and are not included in this evaluation.

Lakefront Property (Parcel K-2)

Scale: 1"=400'

Plattsburgh AFB, NY

SEBS Atch 1B



SS-018/SS-028 RECOMMENDED ALTERNATIVE EXTENT OF REUSE RESTRICTIONS

FIGURE 8

**PUBLIC NOTICE****FINDING OF SUITABILITY TO TRANSFER (FOST)**

The United States Air Force Real Property Agency (AFRPA) announces it has completed a Finding of Suitability to Transfer (FOST) for approximately 2.4 acres of land (Parcel K-2, Lakefront) at Plattsburgh Air Force Base. The FOST is based on extensive review of the environmental condition of the property and was signed on May 7, 2004. The environmental review and documentation which led to the FOST were accomplished under the National Environmental Policy Act (NEPA) and done in consultation with federal and state environmental regulatory agencies.

The property became available as a result of Public Law 101-510, 10 United States Code (USC) Defense Base Closure and Realignment Act of 1990, and the subsequent closure of Plattsburgh Air Force Base.

A copy of the FOST and Supplemental Environmental Baseline Survey (SEBS), including regulatory comments and responses, will be maintained at the local AFRPA office. Individuals interested in reviewing the information should contact:

Mr. Michael D. Sorel, PE
Site Manager/BRAC Environmental Coordinator
Air Force Base Real Property Agency
304 New York Road
Plattsburgh, New York 12903