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#### OFFICE OF THE ASSISTANT SECRETARY

AFRPA/DR 2261 Hughes Avenue, Suite 121 Lackland AFB TX 78236-9821

The Honorable Andrew M. Cuomo Governor, State of New York Executive Chamber State Capitol Albany NY 12224

Dear Governor Cuomo:

We respectfully request your review and approval of the attached package developed under the provisions of 42 U.S.C. §9620(h)(3)(C) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), for the "early transfer" of real property at the former Plattsburgh Air Force Base (AFB), New York, a Federal facility listed on the National Priorities List.

Our staff engaged in a joint, cooperative effort with the staffs of the New York State Department of Environmental Conservation (NYSDEC) and the U.S. Environmental Protection Agency (USEPA) Region II to develop the enclosed early transfer package. This transaction involves the transfer of approximately 725 acres of land at the former Plattsburgh AFB as part of the Public Benefit Conveyance agreement. We propose that this total acreage be transferred as an "early transfer" property.

Under the provisions of \$9620(h)(3)(C)(i), the USEPA Regional Administrator, with your concurrence, may defer the requirement of \$9620(h)(3)(A)(ii)(I) which requires the Federal deed for a land transfer to include the covenant that all remedial action necessary to protect human health and the environment with respect to hazardous substances remaining on the property has been taken before the date of such transfer. The deferral allows the Air Force to deed this property before it completes all remedial action. The Air Force shall execute and deliver the required warranty in an appropriate document when all response action necessary to protect human health and the environment, with respect to any hazardous substance remaining on the property on the date of transfer, has been taken.

In accordance with this authority, the Regional Administrator must make the statutory findings set forth in 9620(h)(3)(C)(i)(I-IV). Generally, these findings state that: 1) the property is suitable for transfer for the use intended by the Transferee; 2) the deed or other agreement governing the transfer between the United States and the Transferee contains the assurances set forth in 9620(h)(C)(i)(I-IV); 3) the Air Force has complied with the public notice requirements for this process; and 4) the deferral and transfer of the property will not substantially delay any necessary environmental response action at the property.

The USEPA Region II Administrator will be forwarding the Findings Determination for your concurrence. We believe the following documents, developed in the cooperative efforts, provide the information which will allow you to concur with the necessary findings and deferral determination:

a. The Finding of Suitability for Early Transfer (FOSET) documents the Air Force's finding that the Property is suitable for transfer prior to the completion of all remedial actions and restrictions are in place to continue and support protection to human health and the environment. The Air Force retains access rights to complete required environmental response action on the property.

b. The Supplemental Environmental Baseline Survey (SEBS) supplements earlier surveys of former Plattsburgh AFB and provides detailed, site-specific information concerning the environmental condition of the property.

c. The Covenant Deferral Request (CDR) complies with the statutory requirements for this transfer and incorporates the conditions identified in the FOSET as necessary to ensure protection of human health and the environment.

As a result of the joint effort of our staffs, we have now satisfied all requirements to provide for the early transfer of this property to the County of Clinton. We respectfully request that you concur with the deferral determination and findings necessary for the Air Force to proceed with this proposed deed transaction. Once approval is received from the USEPA Regional Administrator, and you have indicated your concurrence, we will have the authority to forward the deed to the County of Clinton to complete this action.

This represents a great milestone resulting in whole base property transfer reflecting on the successful reuse of former Plattsburgh AFB and is a result of our strong partnership with the State of New York and USEPA.

Sincerely,

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ROBERT M. MOORE Director

Attachments: 1. FOSET, SEBS and CDR 2. Cover Letter on Deferral Request Package submitted to Ms. Judith A. Enck

cc: Ms. Judith A Enck USEPA Region II 290 Broadway, 26<sup>th</sup> Floor New York NY 12224

Mr. Joseph Martens Commissioner, NYSDEC 625 Broadway, 14<sup>th</sup> Floor Albany NY 12223-1010

### FINAL FINDING OF SUITABILITY FOR EARLY TRANSFER FOR CENTRAL AIRFIELD Former Plattsburgh Air Force Base (AFB), New York April 2012

#### **1. PURPOSE**

**1.1** The purpose of this Finding of Suitability for Early Transfer (FOSET) is to identify environmental factors associated with the Central Airfield area on the former Plattsburgh AFB, New York (described in Section 2 below), and to determine whether the proposed transfer of the Property prior to the completion of all remedial actions, at Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites FT-002 Fire Training Area/Industrial Area (IA) Groundwater Operable Unit (OU) and SS-004 Flightline Soil OU, is consistent with the protection of human health and the environment.

**1.2** The County of Clinton has requested conveyance of the Property pursuant to the Defense Base Closure and Realignment Act of 1990, Pub. L. No. 101-510 and Section 2903 of Pub. L. No. 103-160 (10 U.S.C.§ 2687 note), for the purpose of economic redevelopment of the base. Redevelopment of this Property will be for conversion of the former military airfield and aviation support facilities into an international airport.

**1.3** This FOSET is a result of a thorough analysis of information contained in the following documents: (1) the Final Environmental Impact Statement (FEIS) for Disposal and Reuse of Plattsburgh AFB, dated November 1995; (2) the Asbestos Survey of Plattsburgh Air Force Base, dated December 1995; (3) the Closure Report for Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks, and Aboveground Storage Tanks (six volumes), dated April 1997; (4) the Final Underground Storage Tanks Site Characterization Report (Volumes 1 and 2), dated April 1999; (5) the Aircraft Refueling System Closure Report (four volumes), dated May 2000; (6) the Environmental Assessment of Alternative Land Uses (Supplement to the November 1995 FEIS), dated May 2000; (7) the Supplemental Evaluation to the Basewide Environmental Baseline Survey (three volumes), dated May 2001; (8) the Asbestos Assessment/Inspection at Selected Industrial Structures (two volumes), dated October 2001; (9) the Land Use Controls/Institutional Controls (LUC/ICs) Management Plan for the Former Plattsburgh AFB, dated October 2002; (10) the Report on Repair of Damaged Asbestos-Containing Material at Selected Industrial Structures, dated March 2003; (11) the Third Five-Year Review Report for Plattsburgh AFB, dated November 2009; (12) the Closure Report for Investigation/or Remediation of Miscellaneous EBS Factors - Solid/Hazardous Waste Sites, Petroleum Site, and PCB Sites, dated February 2005; (13) the Site FT-002 Fire Training Area Source Operable Unit Record of Decision, dated March 2001; (14) the Fire Training Area (FT-002) Source Operable Unit Operations and Monitoring Plan, dated January 2005; (15) the Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Interim Record of Decision, dated May 2003; (16) the Air Force Fire Training Area (FT-002)/Industrial Area Groundwater

Operable Unit Record of Decision, dated June 2005 (signed by the Air Force August 2005); (17) the Flightline (SS-004) Final Remedial Investigation Report (three volumes), dated August 2007; (18) the Site SS-005 Non-Destructive Inspection Facility Soil Operable Unit Record of Decision, dated March 1998; (19) the SS-006 Aerospace Ground Equipment Facility Soil Operable Unit Record of Decision, dated March 1998; (20) the Munitions Maintenance Squadron Final Record of Decision, dated August 2008; (21) the Site SS-016 Nose Dock 8 Final Record of Decision, dated September 2008; (22) the Site SS-016 Nose Dock 8 Confirmatory Soil Boring and Sub-Slab Soil Gas Sampling Report, dated May 2007; (23) the Landfill LF-023 Source Control Record of Decision, dated September 1992; (24) the LF-023 (Groundwater Surface Water and Sediment) Record of Decision, dated January 1995; (25) the SS-027 Liquid Oxygen Plant NFRAP Decision Document, dated September 2004; (26) the Jet Engine Test Cell (SS-029) Site Investigation Report, dated December 1996; (27) the Building 2612 (SD-041) Final Remedial Investigation Report (three volumes), dated September 2008; (28) the NFRAP Decision Document for the Former Weapons Storage Area Radiological Waste Investigation, dated September 2004; (29) the Evaluation Report of Subsurface Conditions at the Mobil Service Station (Rt 22), dated August 1994; (30) the Post-Closure Monitoring Report (for September -December 2008) for IRP Site LF-023, dated March 2009; (31) the Addendum to the Report on the Idaho Avenue Groundwater Ammonia Contamination Investigation, dated October 2006; (32) the Building 3288 Diesel Fuel UST Closure Report, dated August 2005; (33) the Soil Vapor Intrusion Survey Data Summary Report (November 2006 - April 2007) for Industrial Area Buildings East of the Flightline Ramp, dated December 2008; (34) the Technical Memorandum for the Building 2793 Soil and Groundwater Sampling Event (October 7-9, 2008). dated December 18, 2008; (35) the Supplemental Soil Vapor Intrusion Survey Data Summary Report (March – April 2008), dated May 2009; (36) the Revised Supplemental Closure Report for the Washrack Area, dated January 2008; (37) the Removal Action Report for the Drum Removal Area, dated March 2007, (38) the Operations Summary and Progress Assessment (for 2006 -2007) for the FT-002 Source Operable Unit, dated September 2008, (38) the Operations Summary and Progress Assessment (for 2008) for the FT-002/IA Groundwater Operable Unit, dated April 2009, (39) the Semi-Annual Monitoring Report for Selected Wells Upgradient from Kemp Lane, dated January 2009; (40) the March 2009 Sub-Slab Soil Gas and Indoor Air Sampling Results for Buildings 2763, 2766, and 2793; (41) the Plattsburgh AFB Revised Basewide Environmental Baseline Survey (EBS), dated May 1997; and (42) the Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Draft Supplement to the January 2002 Final Proposed Plan, dated April 2010; (43) the Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Draft Record of Decision, dated May 2010; (44) the Semi-Annual Operations Report ((July – December 2009) and 2009 Operations Summary and Progress Assessment for the FT-002/IA Groundwater Operable Unit, dated November 2010; (45) the Building 2766 Soil vapor Extraction System Design Document, dated November 2010; (46) the Industrial Area Buildings Data Summary Report for Sub-Slab Vapor Survey and Indoor Air Monitoring (March 2009 thru March 2010), dated December 2010; (47) the Operation and Monitoring Report (December 2009 through December 2010) for the Former Building 2753 Machine Shop Area Sub-Slab Soil Venting System, dated January 2011; (48) the Final FOSET for the Golf Course, Industrial, and Western Areas, dated January 2009; (49) Visual Site Inspections dated March 2012; (50) the Final Supplemental EBS (SEBS) for the Central Airfield

Area, dated March 2012; (51) the USEPA Letter to the AFRPA dated 29 November 2011, regarding Invocation of Dispute Resolution; (52) the NYSDEC Letter to the AFRPA dated 1 December 2011, regarding vapor Intrusion Issues; and (53) the AFRPA Letter to the USEPA and the NYSDEC dated February 2012, regarding the Central Airfield Area Finding of Suitability for Early Transfer and Soil Vapor Intrusion Restrictions. All documentation used for the preparation of this Finding of Suitability for Early Transfer (FOSET) is available for review at the Air Force Center for Engineering and the Environment office at Plattsburgh, New York.

### 2. PROPERTY DESCRIPTION

The Property included in this document is located in the central portion of the former Plattsburgh AFB and consists of 34 buildings, 19 support structures, 5 navigational aids, paved areas, and various areas of open space and wooded land covering an area of approximately 725.79 acres (hereinafter referred to as the "Property"), and is shown at Attachment 1A. The buildings and structures, with their sizes and construction dates, are listed in Tables 2A and 2B below. The Property also includes roads and automobile parking areas supporting the buildings. This area was consistently used for aircraft operations/support, maintenance, and material storage/distribution, since construction of the air base. Detailed historic land use for this area can be found on pages 6 through 11 of Table B-1 in the Basewide EBS.

Table 2A, Existing Facility Information				
		Size or	Year	
Facility Number	Usage	Quantity	Constructed	
2700 (S)	Sound Suppressor	1,300 SY	1970	
2702 (B)	Runway Lighting Vault	870 SF	1956	
2704 (B)	Emergency Generator	1,560 SF	1960	
2706 (S)	Drainage Pond Aerator	N/A	1992	
2709 (S)	Support Structure (Concrete Pad)	N/A	1964	
2710 (B)	Base Photography Laboratory	5,118 SF	1956	
2712 (B)	Base Operations	13,059 SF	1956	
2713 (S)	Vehicle Parking Compound	8,888 SY	1957	
2714 (B)	Radio Maintenance/Transient Alert	5,376 SF	1956	
2716 (B)	Squadron Operations	5,376 SF	1956	
2720 (B)	Fire Station (Admin)	1,595 SF	1959	
2731 (S)	Training Aid (Platform)	N/A	1985	
2736 (B)	Security Police Operations	7,071 SF	1956	
2738 (B)	Fire Station (Admin)	7,071 SF	1956	
2739 (S)	Antenna Support Structure	N/A	1970	
2741 (B)	Aircraft Maintenance (Nose) Dock #1	28,046 SF	1956	
2748 (B)	Fire Station	17,182 SF	1956	
2749 (S)	Emergency Generator Shed	204 SF	1978	
2750 (B)	Wing Headquarters	15,177 SF	1957	

Table 2A, Existing Facility Information

	Table 2A, Existing Facility III	Size or	Year
Facility Number	Usage	Quantity	Constructed
2752 (S)	Emergency Generator Sheds	300/100 SF	1988
2753 (B)	Aircraft Maintenance Shop	58,546 SF	1956
2754 (B)	Base Hazardous Storage	65 SF	1977
2763 (B)	Aircraft Maintenance Hangar	166,367 SF	1956
2766 (B)	Aircraft Maintenance (Nose) Dock #2	28,046 SF	1956
2768 (S)	Loading and Unloading Platform	N/A	1981
2774 (B)	Jet Engine Maintenance/Hazardous	30,720 SF	1956
	Materials Pharmacy	, , , , , , , , , , , , , , , , , , ,	
2776 (S)	Antenna Support Structure	N/A	1966
2778 (B)	Avionics Maintenance Shop	24,386 SF	1956
2780 (S)	Support Structure	N/A	1984
2784 (B)	Survival Equipment Shop	8,516 SF	1956
2785 (B)	Aircraft Maintenance (Nose) Dock #4	28,046 SF	1956
2786 (B)	Group Headquarters Admin	7,090 SF	1956
2787 (B)	Communications Facility	13,588 SF	1956
2789 (S)	Deicing System Pumphouse	1 EA	1992
2790 (S)	Deicing System Tanks	2 EA	1992
2793 (B)	Aircraft Maintenance (Nose) Dock #3	28,046 SF	1956
2794 (S)	Walk-In Cooler	1 EA	1980
2795 (S)	Concrete Pad	1 EA	1965
2796 (B)	Aircraft Parts Warehouse	5,376 SF	1956
2797 (B)	Dining Hall, Detached	5,376 SF	1956
2801 (B)	Weapons Systems Maintenance Shop	24,044 SF	1956
2802 (B)	Non-Destructive Inspection Lab	4,027 SF	1956
2808 (B)	Aircraft Maintenance (Nose) Dock #5	28,046 SF	1956
2815 (B)	Aircraft Support Equipment Shop	26,500 SF	1980
2816 (P)	Aircraft Support Equipment Storage	5,816 SY	1980
2818 (B)	Aircraft Maintenance (Nose) Dock #6	28,046 SF	1956
2820 (B)	Jet Engine Test Cell	3,472 SF	1969
2826 (S)	Vehicle Fueling Station	264 SF	1982
2827 (B)	Snow Dock	29,700 SF	1976
2836 (S)	Liquid Oxygen Storage	1,500 SF	1967
3005, 3010,	Aircraft Parking Apron	1,149,517 SY	1956
3015, 3020,			
3060, 3065,			
3070, 3075, 3080			
(P)			

## **Table 2A, Existing Facility Information**

		Size or	Year
Facility Number	Usage	Quantity	Constructed
3030, 3050,	Aircraft Taxiway	145,387 SY	1957
3110, 3120,			
3130, 3140,			
3150, (P)			
3160 (P)	Paved Shoulder	172,406 SY	1957
3100 (P)	Runway	392,000 SY	1956
3145 (P)	Paved Overrun (North)	33,333 SY	1960
3218 (NA)	TACAN Station	300 SF	1991
3227 (S)	Emergency Generator (Concrete Pad)	396 SF	1964
3229 (S)	Equipment Pad	53 SY	1978
3235 (NA)	Antenna Support Structure (Concrete	1 EA	1984
	Pad)		
3236 (NA)	Aircraft Radar Station (Concrete1 EA1981		1981
	Pad)		
3283 (NA)	Visual Approach Facility	1 EA	1959
3294 (NA)	Runway Supervisory Unit (Concrete	100 SF	1991
	Pad)		
3400 (B)	BCE Covered Storage	5,183 SF	1961
3592 (B)	MMS Admin	504 SF	1957

## Table 2A, Existing Facility Information

# Table 2B, Former Facility Information

		Size or	Year
Facility Number	Usage	Quantity	Constructed/
			Demolished
2708 (S)	C-Band Radar Meteorological Set	N/A	1967/1995
2711 (S)	Billboard	N/A	1977/1997
2715 (B)	Storage Shed	160 SF	1964/2005
2751 (S)	Monument	N/A	1975/1997
2755 (S)	Monument	N/A	1978/1997
2759 (S)	Field Maint Accumulation Point	N/A	1992/1998
2760 (S)	Maint Hangar Accumulation Point	N/A	1992/1998
2764 (B)	Emergency Generator Shed	200 SF	1979/1997
2765 (S)	Monument	N/A	1979/1997
2770 (B)	Vehicle Operations Admin	720 SF	1986/1993
2775 (S)	Electrical Substation	7,515 KV	1956/2005
2777 (S)	Deluge System Reservoir	600,000 GAL	1957/2012
2779 (B)	Deluge System Pumphouse	1,462 SF	1957/2012
2803 (B)	Warehouse	93 SF	1956/2005
2810 (B)	Vehicle Fueling Station	576 SF	1980/1995

Facility Number	Usage	Size or Quantity	Year Constructed/
			Demolished
2811 (S)	Fuel Storage Tank	5,000 GAL	1980/1995
2812 (S)	Fuel Storage Tank	5,000 GAL	1980/1995
2880 (S)	Fuel Storage Tank	1,000 GAL	1983/1992
3063 (S)	Guard Tower	1 EA	1980/2005
3066, 3067, 3068,	Aircraft Shelters	9,833 SF/EA	1972/2009
3069, 3071, 3072,			
3073, 3074,			
3076 (S)			
3205 (B)	ILS Shop	720 SF	1986/1995
3216 (S)	Support Structure (Pad)	1 EA	1959/2009
3220, 3230, 3240,	Jet Fuel Pumphouse	2,026 SF/EA	1956/1996
3250, 3260, 3270,	-		
3280, 3285 (S)			
3221, 3231, 3261,	Jet Fuel Systems	23-2800	1956/1996
3281,		GPM/EA	
3286 (S)			
3222, 3232, 3262,	Emergency Generators	160 SF/EA	1964/1996
3282,			
3287 (S)			
3226 (S)	Septic System	1 EA	UNK/1996
3237 (S)	Transformer Pad	5 SY	1981/1996
3241, 3271	Jet Fuel Storage	14,286 BL	1956/1996
3251 (S)	Av Gas Storage	2,381 BL	1957/1996
3284 (NA)	Wind Sock	1 EA	1961/2009
3288 (S)	Emergency Generator	195 SF	1986/2009
3289 (NA)	Glide Slope Indicator	186 SF	1956/2009
3290 (NA)	Antenna Support Structure	2 EA	1980/2009
3399 (S)	Elect Substation	2,000 KV	1961/2005
3401 (S)	Septic System	1 EA	1961/1996

## **Table 2B, Former Facility Information**

## KEY FOR TABLES 2A AND 2B

- **B:** Building
- S: Support Structure NA: Navigational Aid
- **P:** Pavements
- A: Acreage

## 3. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts of this proposal have been adequately analyzed and disclosed in compliance with the NEPA. The County of Clinton has requested conveyance of the Property for the purpose of economic redevelopment of the base. Redevelopment of this Property will be for conversion of the former military airfield and aviation support facilities into an international airport. This proposed action complies with the projected commercial, industrial, aviation, and aviation support land uses for this area as outlined in the Environmental Assessment of Alternative Land Uses (Supplement to the November 1995 FEIS), dated May 2000.

## 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 Category (ECC) 5 or 6, as indicated in Tables 4 and 4A below. Category 5 areas are those where release, disposal, and/or migration of hazardous substance have occurred and removal/remedial actions are underway, but not all required actions are complete; Category 6 areas are those where release, disposal, and/or migration of hazardous substances have occurred, but required response actions have not yet been implemented. Changes in the condition of these facilities, since publication of the Basewide EBS, are also presented in Table 4.

	Old	New	Reason for change in Environmental Condition
Location	ECC*	ECC	Category
2700, 2702, 2704, 2706, 2709,	7	5	Within the area of IRP Site FT-002 Fire Training
2710, 2712, 2713, 2714, 2716,			Area/IA Groundwater OU contamination or associated
2720, 2731, 2736, 2738, 2739,			institutional controls. The Remedial
2741, 2748, 2749, 2750, 2752,			Investigation/Feasibility Study (RI/FS) was completed
2753, 2754, 2763, 2766, 2774,			in 2001. All of the physical components of the remedial
2776, 2777, 2778, 2779, 2780,			action have been constructed (2004-2010) and are in
2784, 2785, 2786, 2787, 2789,			operation. The Record of Decision (ROD) is in
2790, 2793, 2794, 2795, 2796,			progress.
2797, 2801, 2802, 2808, 2815,			
2816, 2818, 2820, 2826, 2827,			
2836, 3005, 3010, 3015, 3020,			
3100, 3110, 3145, 3218, 3227,			
3229, 3235, 3236, 3283, 3294,			
3400, 3592			
2768, 3060, 3065, 3070, 3075,	7	6	Within the area of IRP Site SS-004 Soil OU. Remedial
3080, 3120, 3130, 3140, 3150,			activities are pending at IRP Site SS-004 Soil OU; a
3160			Remedial Investigation was completed in 2007, and a
			Proposed Plan/ROD is in progress.

### Table 4, Property Transfer Category

\*As described in the basewide EBS dated 1997

<b>.</b>	Old	New	
Location	ECC*	ECC	<b>Reason for change in Environmental Condition</b>
			Category
2708, 2711, 2715, 2751,	7	5	Within the area of IRP Site FT-002 Fire Training
2755, 2759, 2760, 2764,			Area/IA Groundwater OU contamination or associated
2765, 2770, 2775, 2803,			institutional controls. The Remedial
2810, 2811, 2812, 3216,			Investigation/Feasibility Study (RI/FS) was completed
3226, 3237, 3284, 3288,			in 2001. All of the physical components of the remedial
3289, 3290, 3399, 3401,			action have been constructed (2004-2010) and are in
			operation. The Record of Decision (ROD) is in
			progress.
2820, 3063, 3066, 3067,	7	6	Within the area of IRP Site SS-004 Soil OU. Remedial
3071, 3072, 3073, 3074,			activities are pending at IRP Site SS-004 Soil OU; a
3076, 3068, 3069, 3205,			Remedial Investigation was completed in 2007, and a
3220, 3221, 3222, 3230,			Proposed Plan/ROD is in progress.
3231, 3232, 3240, 3241,			
3250, 3251, 3260, 3261,			
3262, 3270, 3271, 3280,			
3281, 3282, 3285, 3286,			
3287			

**Table 4A, Property Transfer Category - Former Facilities** 

\*As described in the basewide EBS dated 1997

### 5. RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Section 1.3 were evaluated to identify environmental factors 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 in the deed or as specific notification to the transferee. The factors that require either deed restrictions or specific notifications are identified in Attachment 2 and are discussed below. The Air Force has determined that the remaining factors listed in Attachment 2 pose no threat to human health or the environment and, therefore, require neither Deed restrictions nor notifications to the transferee. The restrictions laid out in Section 5 are for environmental purposes. In addition, the Air Force as a matter of policy is restricting other areas of the parcel to industrial/commercial use consistent with the pre base closure use of this Property.

Conditions required to be included in the Deed to enable the conveyance of the Property under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) § 120(h)(3)(C), prior to the completion of all remedial actions, are identified below and set forth in the Covenant Deferral Request (CDR). Nothing in this FOSET or the accompanying CDR modifies or diminishes any of the Air Force's obligations under any environmental law or statute.

#### 5.1 Hazardous Substances Notification

Consistent with the provisions of CERCLA § 120(h)(3), which requires that whenever Federal property on which hazardous substances were stored for one (1) year or more, released or disposed of is conveyed, each Deed entered into for the conveyance of such property will include a notice of the type and quantity of such hazardous substances and of the time at which such storage, release or disposal took place. This notice requirement was codified at 40 CFR Part 373 which provides that the notice requirement applies only when hazardous substances are or have been stored in quantities greater than or equal to: (1) 1,000 kilograms or the hazardous substance's CERCLA reportable quantity found in 40 CFR Part 302.4, whichever is greater (40 CFR Part 373.2(b)); or (2) 1 kilogram if the substance is an acutely hazardous substance found in 40 CFR Part 261.30 (40 CFR Part 373.2(b)). Additionally, this regulation also provides that the notice required for the known release of hazardous substances applies only when the hazardous substances are or have been released in quantities greater than or equal to the substance's CERCLA reportable quantity.

As described in the Basewide EBS and the SEBS, storage of hazardous substances has occurred at the following facilities (as part of each facility's functions identified in Tables 2A and 2B above): 2710, 2714, 2715, 2741, 2748, 2753, 2754, 2759, 2760, 2763, 2774, 2775, 2785, 2793, 2801, 2802, 2808, 2815, 2818, 2820, 2827, 3270, and 3287.

A list of hazardous substances, requiring notification, known to have been stored on this Property for a period of one (1) year or more, is provided in Attachment 3, Notice of Hazardous Substances Stored.

Per the Basewide EBS and the SEBS, there has been a release of hazardous substances at 2710, 2789, and 2812. A Notice of Hazardous Substances Released is provided at Attachment 4. In addition, the Property contains contamination (or previously contained contamination, but has been cleaned up) associated with IRP Sites SD-001, FT-002 (Source and Groundwater OUs), SS-004, SS-005, SS-006, SS-017, LF-023, SS-027 and SS-029. These sites are discussed further in Section 5.2 and are included in the Hazardous Substances Release notification at Attachment 4.

In addition to the spills/releases listed above, during the construction of the IRP Site FT-002 Fire Training Area/IA Groundwater OU extraction wells and discharge pipeline, buried drums, contaminated soil and construction debris were encountered (approximately 200 feet west of Extraction Well No. 4) immediately east of a concrete pad that had reportedly been the site of a former highway maintenance facility prior to construction of the Air Force base in the 1950s. In 2003-2004, sixteen drums, 667 tons of contaminated soil (containing fuel-related compounds and pesticides), and 63.5 tons of construction debris were excavated/removed. Five of the drums contained sludge, oily product, or pavement joint sealant; the remaining drums were corroded/empty. A geophysical survey consisting of magnetometer screening and exploratory excavations was completed and no additional drums or contaminated soil was found. Post excavation sampling results show that all contaminants of concern have been eliminated or reduced to below their respective clean up objectives, and that all sources of contamination in the soil have been removed. Groundwater impacts were also assessed and found to be minimal; this area is within the IRP Site FT002 Fire Training Area/IA Groundwater OU where remedial systems are already in place and operating to recover and treat the groundwater. No further action is recommended for this area, per the March 2007 Removal Action Report for the Drum Removal Area.

A hazardous substance notice will be given in the Deed of the type and quantity of hazardous substances and the time at which storage, release, or disposal took place.

#### 5.2 Installation Restoration Program (IRP) and Areas of Concern (AOCs)

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

**5.2.1** There are ten IRP Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites located on portions of this property as shown at Attachments 1A and 1B, and described below. Not all remedial actions have been taken at two sites: The Fire Training Area (FT-002)/IA Groundwater OU, and the SS-004 Flightline Soil OU; these sites require a covenant deferral, as specified in CERCLA 120(h)(3)(a)(ii)(I), and are discussed in Section 5.2.1.1. The other sites are discussed in Section 5.2.1.2.

**5.2.1.1** Sites requiring deferral of the CERCLA Covenant

<u>**FT-002</u>** is the former fire training area. Remedial activities are being conducted under two OUs; the FT-002 Source OU is discussed in Section 5.2.1.2.</u>

**FT-002/IA Groundwater OU** addresses contaminated groundwater at and downgradient from the FT-002 Source OU, and groundwater at or near six other IRP sites including SS-004, SS-005, SS-006, SS-011, SS-017, and SS-041. The FT-002/IA Groundwater OU is partially located within this Property and is shown at Attachment 1A, 1B, and 1F. This OU encompasses an area of approximately 978 acres; approximately 714.55 acres of this OU are located within this Property (the other portions of this OU were evaluated in the January 2009 FOSET for the Golf Course, Industrial, and Western Areas). The groundwater contamination includes chlorinated hydrocarbons and fuel-related compounds, and extends over one mile downgradient from the FT-002 source area. The groundwater contamination was investigated and remediation alternatives were evaluated in a Remedial Investigation/Feasibility Study (RI/FS), which was finalized in 2001. An Interim Record of Decision (IROD) that addresses the FT-002/IA Groundwater OU was signed by the Air Force and the USEPA in June 2003, and the physical remedy (identified below) has been constructed.

After significant discussions from 2005 through 2007 of the potential for vapor intrusion risks, the Air Force performed an evaluation of soil vapor intrusion into the industrial area within the groundwater contamination plume, which is detailed in Section 5.10.

The final remedy for the FT-002/IA Groundwater OU is expected to include: institutional controls (e.g., lease and deed restrictions shown at Attachments 1A and 1F) to limit the use and discharge of groundwater (Attachments 1A-2 and 1F-1), to prohibit property development that would interfere with remedial operations, prohibit residential property development and residential land use (Attachments 1A-2 and 1F-1), and either perform sampling to show no unacceptable risk is present, or perform mitigation measures to address the potential risk from vapor intrusion for future construction and future building modifications that could increase human exposure and new building construction (the vapor intrusion restrictions are shown at Attachments 1A-3 and 1F-2); three groundwater collection trenches, (one located between the runway and flightline, one located along the eastern edge of the flightline, and one located along Idaho Avenue); extraction wells located in the plume core west of the runway; groundwater treatment systems to treat contaminated groundwater from the collection systems discharging to the WSA and Golf Course drainage systems, soil vapor extraction (SVE) systems to address sub surface soil gas contamination and the potential for health risks from potential soil vapor intrusion; groundwater and surface water monitoring; and five-year site reviews in accordance with Section 121(c) of CERCLA.

Construction of the physical components of the remedial action, including the SVE systems, has been completed. The groundwater portion of the remedial action has been operating since February 2005. The Building 2753 and 2766 SVE systems have been constructed and have been in operation since December 2009 and December 2010 respectively. Attachment 1C shows the extent of the groundwater contamination presented in the 2001 RI/FS compared to the current extent of contamination based on the 2009 annual groundwater sampling event. There has been a significant reduction in the extent of the groundwater contamination. A Supplemental Proposed Plan and Revised ROD to document these elements have been submitted for regulatory review (April and May 2010). Regulatory comments to the Supplemental Proposed Plan have been received (July 2010) and are being addressed. The Revised ROD will be resubmitted after completion of the Supplemental Proposed Plan (Summer 2012).

<u>SS-004 Soil OU</u> is the flightline, covers an area of approximately 265.82 acres, is located in the central portion of this Property, and shown at Attachment 1B. The most prominent feature within the site is the concrete and asphalt flightline ramp, which was used for aircraft parking and refueling during the period from 1954 to 1995. An underground fuel distribution system, referred to as the Aircraft Refueling System (ARS), was also present beneath the ramp. The distribution system consisted of eight pumphouses with underground tanks located along the western edge of the flightline with lateral fuel distribution lines running underneath the ramp from west to east. The ARS was dismantled in 1996. Spills have resulted from aircraft operations and maintenance and may have migrated to soils and drainage ways along the perimeter of the ramp, particularly to the south and east. Another potential contaminant source includes aircraft exhaust particulate accumulating in the surface soils. Groundwater

contamination in the flightline (SS-004) area is being addressed and monitored as part of the Fire Training Area (FT-002)/IA Groundwater OU. The RI for this site was done in 1993, but was updated in 2003 to incorporate data collected from the ARS closure, the Fire Training Area (FT-002)/IA Groundwater OU RI/FS, the Pumphouse #3 groundwater investigation, and additional fieldwork (soil, sediment, and surface water sampling) collected in 2002. Widespread metals and polyaromatic hydrocarbon (PAH) contamination is present in the surface soils adjacent to and east of the flightline ramp. This contamination is likely the result of the combustion of fossil fuels from aircraft and service vehicles; the eastern edge of the flightline ramp is situated on the down slope and downwind side of the ramp. The contamination decreases rapidly with depth and is likely of concern only within a few inches of the ground surface. Generally, only low concentrations of chemicals were detected in subsurface soils adjacent to and beneath the flightline ramp. However, VOCs were detected in excess of standards in subsurface soils in the vicinities of former Pumphouses #2 and #3 on the western side of the ramp. The Pumphouse #3 area was investigated thoroughly (discussed in Section 5.3.2) and separately from the SS-004 RI; routine groundwater monitoring is ongoing in this area. Approximately 5,900 cubic yards of soil were removed as part of the Pumphouse #2 removal in 1996. Groundwater sampling at the former Pumphouse #2 was initiated in March 2005 (as part of the annual groundwater sampling for the Fire Training Area (FT-002)/IA Groundwater OU) and discontinued in 2008 when sampling results indicated no exceedances of groundwater standards. Surface water samples were collected as part of the RI; no detections exceeded surface water Applicable or Relevant and Appropriate Requirements (ARARs). Sediment samples were collected in the drainage ways during the RI and in 2002. The sediment contamination was evaluated in the Human Health Risk Assessment and Ecological Risk Assessment. No unacceptable risk is associated with human receptor exposure to the contaminated sediment. There is a potential ecological risk to avian species due to metals contamination in the surface soil; mitigation of this risk will likely be accomplished via bird population control as part of commercial air operations that are taking place at this site. A Final RI Report has been completed (2007). A Draft Proposed Plan is in progress (will be submitted Summer 2012).

#### 5.2.1.2 Sites where required remedial actions have been taken

SD-001 is the base golf course drainage system, covers an area of approximately 27.37 acres, is located partially within the southeast portion of this Property, and shown at Attachment 1A. The drainage system is 5,900 feet long and receives surface water runoff from the flightline, aircraft, and maintenance and support facilities. After being collected in a retention pond, the storm water flows off base through the Cliff Haven housing development and into Lake Champlain. There is a possibility that past solvent and fuel spills were transported off base via this drainage system. A draft site investigation (SI) report and decision document was completed in 1992. The SI/decision document recommended no further action based on a qualitative public health and ecological hazard assessments. Regulatory concurrence for no further action was received in June 1995.

The FT-002 Source (OU) covers an area of approximately 24.46 acres, is located partially within the northwestern portion of this Property (shown at Attachments 1A and 1E), and

consisted of four fire training pits that were used from the mid-1950s until 1989. During training exercises, firefighters saturated the pits with water, poured off-specification jet fuel mixed with waste oil, solvents, and other chemicals, and then ignited the mixture. The site has been extensively investigated and interim removal actions have been implemented, including the installation and operation of free product recovery, soil vapor extraction, and bioventing systems. A Record of Decision for the source was signed in March 2001 to address sources of contamination. The remedy involves a combination of soil vapor extraction and bioventing of the contaminated soil, free product recovery, water table depression enabling remediation of residual product adhering to soil below the water table, hydraulic containment of the remaining source, institutional controls (shown at Attachment 1E), progress monitoring and sampling, and five-year site reviews in accordance with CERCLA Section 121(c). Free product levels and recovery rate trends, and remediation progress soil boring and sampling (conducted in 2001, 2006 and 2007) results, indicate the remedial objectives specified for the FT-002 Source OU have been accomplished. The FT-002 Source OU remediation systems were placed on "standby", in July 2008, pending confirmation (by periodic monitoring) that there is no recurrence of free product. No significant levels of free product have been detected since remediation systems were placed on "standby". Permanent shutdown, and decommissioning, of the FT-002 Source OU remediation systems, has been recommended. The Air Force will prepare a Remedial Action Completion Report to document completion pursuant to the "DoD/EPA Joint Guidance on Streamlined Site Closeout and NPL Deletion Process for DoD Facilities" (anticipated to be submitted September 2012).

**SS-005 Soil OU** is the former Non-Destructive Inspection (NDI) Facility, covers an area of approximately 2.26 acres, is located within the eastern portion of this Property, and shown at Attachments 1A and 1G. The facility was used for the non-destructive x-ray inspection of aircraft parts. Although there was evidence of spillage and/or disposal of hazardous substances at the site, chlorinated hydrocarbons and fuel-related compounds were detected in site soils and groundwater during the RI at levels only slightly above ARARs and guidance values. Groundwater contamination at this site is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU. The Risk Assessment for the SS-005 Soil OU, which did not include evaluation of a future residential use scenario, revealed that risks to human health and the environment, given the current and planned future use of the site (industrial/commercial), were within acceptable levels. The ROD for the Soil OU at this site was signed in April 1998. The remedy selected for the site was "Institutional Controls" and called for restrictions limiting development of the site to non-residential uses, prohibition of the installation of any wells that could result in the use of groundwater underlying the site, and evaluation of the institutional controls during five-year reviews of the remedy. The restrictions are shown at Attachment 1G.

<u>SS-006 Soil OU</u> is the former Aerospace Ground Equipment (AGE) Facility, covers an area of approximately 6.47 acres, is located within the eastern portion of this Property, and shown at Attachments 1A and 1H. The site consists of the AGE Building (#2815), at which power carts utilized on the flightline were maintained and repaired, and Building 2801, which housed the Precision Measurement Equipment Laboratory, the Weapons Systems Management and Maintenance Facility, and other flightline-related offices. Although there was evidence of

spillage and/or disposal of hazardous substances at the site, chlorinated hydrocarbons and fuelrelated compounds were detected in site soils and groundwater during the RI at levels only slightly above ARARs and guidance values. The minor groundwater contamination detected was shown to be unrelated to soil contamination at the site and is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU. The Risk Assessment for the SS-006 Soil OU, which did not include evaluation of a future residential use scenario, revealed that risks to human health and the environment, given the current and planned future use of the site (industrial/commercial), were within acceptable levels. The ROD for the Soil OU at this site was signed in April 1998. The remedy selected for the site was institutional controls and called for restrictions limiting development of the site to non-residential uses, prohibition of the installation of any wells that could result in the use of groundwater underlying the site, and evaluation of the institutional controls during five-year reviews of the remedy. The restrictions are shown at Attachment 1H.

<u>SS-017 Soil OU</u> is Building 2774, covers an area of approximately 2.45 acres, located within the eastern portion of this Property, and shown at Attachment 1A. The site includes the immediate areas surrounding Building 2774 and 2753. Building 2774 supported aircraft engine maintenance activities, and Building 2753 served as an aircraft maintenance machine shop. An Interim Remedial Measure (IRM) was executed in 1992, during which a concrete pad (south of Building 2774) and approximately 200 cubic yards of contaminated soil surrounding the pad were removed and disposed. Subsequent investigations were implemented to evaluate the surrounding area. In February 1997, a second removal action was initiated to address soil contamination remaining following the IRM. Systems installed and operated for the removal action included soil vapor extraction (SVE), bioventing, and biosparging. The IRM implemented in 1992 and the second removal actions undertaken from 1997 to 2002 are considered to have been successful in eliminating the principal threats for the SS-017 Soil OU. Soil sampling and analysis conducted to assess the progress of the removal action indicated that soil contamination was reduced to levels considered protective of human health and groundwater resources. A No Further Action ROD for the SS-017 Soil OU was signed in July 2002. Groundwater contamination under this site is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU.

**LF-023** is a former domestic waste landfill located along the western portion of this Property and shown at Attachments 1A and 1I. Remedial activities are being conducted under two OUs: a source OU (covering an area of approximately 27.18 acres), immediately adjacent to this Property, and a groundwater OU (covering an area of approximately 67.65 acres) that extends onto the western portion of this Property in the vicinity of Building 3400. This landfill operated from 1966 to 1981. The Basewide EBS indicates this area was once used a vehicle fire training facility before being converted into a landfill. 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 OU. The Groundwater OU ROD was signed in March 1995, and long-term monitoring began in October 1995. Monitoring results thus far have

FOSET, Central Airfield, Former Plattsburgh AFB, April 2012 indicated that the cap is proving to be effective, the remedial action objectives are being met, and no areas of noncompliance have been noted. In addition to monitoring, the remedy includes institutional controls which are shown in Attachment 1I. In addition to monitoring for landfill-derived contaminants, the program also monitors for contaminants associated with an off-base plume intruding upon base property from a private gas station located west of the landfill (see discussion of the Mobil Gas Station Area of Concern in Section 5.3.2).

<u>SS-027</u> is the former liquid oxygen (LOX) plant (Building 3400), covers an area of approximately 3.09 acres, located partially within the western portion of this Property, and shown at Attachments 1A. The LOX plant ceased operations in approximately 1963 and was converted to a warehouse. Investigations did not reveal any soil contamination above to be considered (TBC) values, and trichloroethylene was the only compound found in groundwater, but also below ARAR and TBC levels. The Draft Final SI, which recommends no further action, was completed in July 2002, and a No Further Action Decision Document was issued by the Air Force in September 2004.

SS-029 Soil OU is the Jet Engine Test Cell, covers an area of approximately 1.18 acres, located within the east central portion of this Property, and shown at Attachment 1A. A preliminary assessment was completed in 1992 and recommended additional investigation because of reported spills at this location. An SI was completed in 1996. Results of soil and groundwater analysis show no evidence of petroleum contamination associated with jet fuel spills. Soil samples were found to contain the organic chemicals methylene chloride, acetone, trichloroethene, toluene, three phthalate compounds, and nine polycyclic aromatic hydrocarbon compounds. None of these chemicals were present at concentrations that exceed regulatory limits. Four metals (arsenic, barium, chromium, and lead) were detected in the soil samples, all at concentrations below NYSDEC technical guidance values. Groundwater contamination at the site is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU. Human health risk calculations were performed to evaluate the risks associated with human exposure to contaminated media. No unacceptable carcinogenic or noncarcinogenic human health risk is associated with exposure to chemicals detected at the site, and the SI report recommended no further action. Regulatory concurrence with the SI report has been received (1997). However, on June 16, 2000, a 200-gallon jet fuel spill occurred at Building 2820 (NYSDEC Spill #0045040) during overfilling of an underground fuel tank by the building tenant (Wood Group Turbines, Inc.); 310 tons of soil were removed and disposed of off base. Subsequent investigation of the area indicated no additional concerns, and the spill has been closed out by NYSDEC.

Based on the above, Institutional Controls (ICs) will be placed upon the Property, in the Deed, in the form of use/access/deed restrictions for IRP Sites FT-002 (Source OU and Groundwater OUs), SS-005, SS-006, and LF-023. The ICs, and applicable boundaries, are shown at Attachments 1E through 1I. These ICs will be removed from the Deed in the future when Remedial Action Objectives are achieved that allow for unrestricted use. These ICs will be implemented in accordance with the Land Use Control/Institutional Control Management Plan for Plattsburgh AFB and applicable Federal, state, or local laws. The ICs 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. The Deed will reserve a nonexclusive easement to allow continued access for the Air Force (or its designated contractor) and regulatory agencies to monitor the effectiveness of the cleanup, perform five-year reviews, and/or take additional remedial or removal actions. Provisions will be placed in the Deed requiring the protection of groundwater monitoring wells on the Property and allowing the Air Force, its designated contractor, and regulatory agencies access to these wells. The transferee will also comply with 6 NYCRR Part 375-1.6 which requires notification (to the Commissioner of the NYSDEC, the Clinton County Clerk, and the Town of Plattsburgh) prior to any physical alteration or construction constituting a substantial change in use, or a substantial change in land use not involving physical alteration or construction, within the boundaries of the above-listed IRP sites and Areas of Concern.

In addition, there are groundwater monitoring wells located on this Property as shown at Attachment 1A. All groundwater monitoring wells located on this Property must not be disturbed and Air Force or regulatory access to these wells must be allowed at all times.

**5.2.2** There are eleven IRP CERCLA Sites and one Area of Concern adjacent to this Property. Based on investigations none of these sites have impacted the Property to be transferred. Listed below is a summary of the adjacent sites.

<u>SS-010</u> is the Heavy Equipment Maintenance Facility, Building 2542, covers an area of approximately 3.96 acres, located east of this Property, and shown at Attachment 1A. The building was used as a maintenance area for fuel tanker trucks and bowsers. Fuel spills and leaks reportedly occurred as a result of accidents during fuel draining and maintenance of this equipment. Spills were also reported in the waste accumulation area located adjacent to the building. A site delineation study and Action Memorandum were performed in 1995/1996. An RI was completed in 1997, and approximately 10,000 cubic yards of soil contaminated with trichloroethene, ethylbenzene, xylenes, benzo(a)anthracene, and benzo(a)pyrene were removed and replaced with clean fill. A closure report was submitted in April 1998 and received regulatory concurrence. The ROD recommending No Further Action was signed in September 2000.

<u>SS-011</u> is the Defense Reutilization and Marketing Office (DRMO) complex, covers an area of approximately 2.36 acres, located east of this Property, and shown at Attachment 1A. This area was operated as a RCRA Part B permitted facility. Numerous spills of hazardous materials/wastes have occurred. In 1991, 600 cubic yards of dichlorodiphenyl trichloroethane (DDT)-contaminated soil, and 400 feet of adjacent railroad track were removed and replaced. An RI Report was completed in 1993. A ROD recommending No Further Action was signed by the Air Force and the United States Environmental Protection Agency (USEPA) in March 1993. Groundwater contamination has also been detected at this location, but appears to be from an upgradient source and is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU.

**SS-013** is the former Munitions Maintenance Squadron (MMS) area, covers an area of approximately 1.67 acres, located southwest of this Property, and shown at Attachment 1A. The RI 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 Final ROD for SS-013 has been completed (September 2008), and recommends ozone sparging to address residual vinyl chloride and naphthalene contamination, and institutional controls. The ozone sparging system has been constructed and is in operation (*An Operating Properly and Successfully Determination has not been prepared, this site was evaluated in the January 2009 FOSET for the Golf Course, Industrial, and Western Area. A CERCLA Covenant deferral, with respect to IRP Site SS-013 was requested in January 2009 and approved in July 2009*).

**SS-016** is Nose Dock 8, Building 2890, covering an area of approximately 5.56 acres, located northeast of this Property, and shown at Attachment 1A. This facility was used for aircraft corrosion control and painting. It contained a 1,956-gallon UST for the storage of spent solvents and waste strippers. This tank ruptured in 1987 with the release of 1,400 gallons of its contents resulting in a groundwater plume extending approximately 1,400 linear feet (LF) downgradient to the southeast. Contaminants of concern include 2-butanone, methylene chloride, toluene, xylenes, ethylbenzene, trichloroethene, and acetone. Source removal has been accomplished, and a groundwater treatment system was operated from 1997 to 2007. Confirmatory soil and soil gas sampling was performed in January 2007, and indicated that the site has been cleaned up. A No Further Action ROD has been completed (September 2008).

**LF-022** is a former domestic waste landfill, which operated from 1959 to 1966, covers an area of approximately 18.86 acres, located northwest of this Property, and shown at Attachment 1A. An RI was conducted in 1991, and the FS recommended the installation of a one-foot soil cap. A Proposed Plan was prepared and approved in 1992, and the ROD was signed in September 1992. Remedial construction was completed in 1994, long-monitoring began in October 1995, and will continue for 30 years. 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.

<u>ST-032</u> is an Industrial Waste Treatment and Disposal Facility (Building 2887), covers an area of approximately 0.05 acres, located northeast of this Property, and shown at Attachment 1A. The treatment facility included a 30,000-gallon UST under the building that collected wastes from Nose Dock 8 and an aircraft washrack (Facility 2891), and discharged them into the sanitary sewer. A preliminary assessment (PA) was conducted in 1992, and the UST was closed in place (filled with concrete). No further action is planned at this site, and NYSDEC/USEPA concurrence has been received (1995).

<u>SS-033</u> is the Old Small Arms Range (OSAR), covers an area of approximately 3.76 acres, located northwest of this Property, and shown at Attachment 1A. It was used for small arms practice between 1960 and 1989. The PA was conducted in 1991 and recommended

FOSET, Central Airfield, Former Plattsburgh AFB, April 2012 removal of target berm soil to address lead contamination. A Removal Action was conducted in 1993/1994 to address this area. The SI was conducted in 1995 and recommended additional areas of soil removal. These areas were excavated in the fall of 1997. Additional sampling was conducted and the SI updated in 2000. A potential residential health risk was identified due to arsenic in the soil used as backfill in the 1993/1994 removal action. A ROD was issued in March 2001, which specified removal of this soil. A Remedial Action was performed in the fall of 2001, and a second Remedial Action was done in 2002. This site has been closed out, regulatory concurrence was received in 2003, and the area is cleared for unrestricted use.

<u>SS-035</u> consists of the Building 2622/2616 loading dock and materials transfer area, covers an area of approximately 2.24 acres, located east of this Property, and shown at Attachment 1A. The loading docks were used prior to 1986 to transfer materials from the railroad spur to the buildings. Two spills occurred at the site in the later 1980s. An unknown amount of an unspecified material was spilled inside of a truck parked at Building 2622. The material was contained in the truck. The second spill was photographic chemicals that leaked when a small hole developed in a container. Both spills were promptly cleaned up. A PA was conducted and a No Further Action Decision Document was recommended and regulatory concurrence received (1995).

**SS-036** is the pesticide storage facility (Building 2566), covers an area of approximately 0.44 acres, located east of this Property, and shown at Attachment 1A. The building has been used for storing pesticides, herbicides, fungicides, and mildewcides since 1984. A PA report was completed in 1994. The PA recommended no further action because no spills are known or believed to have occurred, and there was no visual evidence of contamination or spills. Regulatory concurrence for no further action was received in June 1995.

<u>SS-037</u> is the golf course pesticide storage areas, Buildings 1703 and 1704, located off Golf Course Road in the eastern portion of the base, southeast of this Property, and shown at Attachment 1A. These buildings were used to store pesticides, herbicides, and fungicides until 1990 when these chemicals were stored in Building 2564. A PA was completed in 1992, and there was no visual evidence of spills. Because no spills are known or believed to have occurred, a decision document, recommending no further action, was prepared and signed in September 1992. The site is closed, and regulatory concurrence on no further action has been received.

<u>SS-041 (also known as SD-041) Soil OU</u> is Building 2612, covers an area of approximately 1.52 acres, located east of this Property, and shown at Attachment 1A. In the early 1960s, this facility housed a laboratory, clean room, and process tanks (acid, alkali, vapor degreaser) that supported the Atlas ICBM program. The tanks, clean room, and laboratory were removed from the building prior to 1970. From the 1970s until base closure in 1995, the building was used primarily as a base equipment and supply warehouse. Materials stored at this facility included motor oil, lubricants, miscellaneous solvents, propylene and ethylene glycol, corrosion inhibitors, degreasers, aircraft cleaning compounds, hydraulic fluids, and electrical transformers. A Final RI Report has been completed (September 2008). Groundwater

FOSET, Central Airfield, Former Plattsburgh AFB, April 2012 contaminant distribution indicated a source in the vicinity of Building 2612 has contributed to the regional groundwater contamination that is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU. The RI indicates that no significant continuing sources of groundwater contamination have been found at or in the vicinity of the building; however, the wetland area south of Building 2612 contains metals at concentrations that are of potential concern to terrestrial receptors. Test trenching and sampling have been completed and the extent of metals contamination (cadmium and chromium) in the wetlands has been delineated. The RI recommends removal of approximately 250 cubic yards of metals contaminated soil. The Proposed Plan has been completed (August 2011) and the ROD is in progress (to be completed spring 2012).

The Washrack Area of Concern (AOC) is a paved area adjacent to the parking ramp, covers an area of approximately 1.10 acres, located northeast of this Property, and shown at Attachment 1A. Equipment and piping removals occurred in October and November of 1999, and a closure report (for the equipment and piping removal activity) was issued in September 2001. Additional piping removals, sampling of soil and groundwater, and installation of three monitoring wells were performed in late 2002/early 2003. Geoprobe sampling indicated minor exceedances of Benzene, Toluene, Ethylbenzene, Xylenes (BTEX) compounds in the soil and groundwater. Groundwater flow is generally easterly, and monitoring and sentry wells installed during the investigation indicate that these minor BTEX exceedances are confined to the washrack area itself and are not migrating towards the base boundary and the Kemp Lane area. Additional groundwater sampling was performed in June 2007, and a revised supplemental closure report has been submitted. That report recommends institutional controls and semiannual groundwater monitoring be performed until four successive events show all contaminants to be below regulatory levels in all wells. The USEPA has recently submitted comments to the revised supplemental closure report, and has requested additional information; response to these comments and additional information was provided in April 2010.

### 5.3 Petroleum Products/Derivatives, IRP Fuel Sites, and Miscellaneous Materials

**5.3.1** There are several spills involving petroleum products/derivatives and miscellaneous materials (Freon, Halon, and Hydraulic Fluid) associated with portions of this Property and are summarized in Table 5.3.1 below.

Location	Comments
2748, 2793, 2797,	SPL-2748-1/2/3/4/5, SPL-2793, SPL-2797, SPL-2802, SPL-2812, SPL-
2802, 2812, 2815,	2815-1/2; SPL-2820-1/2/3/4/5, SPL-3010, SPL-3232, SPL-3241, SPL-
2820, 3010, 3232,	3281, SPL-3285: All spills are listed in both the Basewide EBS and
3241, 3281, 3285	NYSDEC Spill Register as closed.
2700	SPL-2700: Approximately three gallons of jet fuel were released into the
	sanitary sewer. Investigation at the time indicated no further action
	necessary. The Basewide EBS and VSI noted no signs of residual
	contamination.

Table 5.3.1, Petroleum/Miscellaneous	Materials Spills/Releases
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Location	Comments
2763	SPL-2763-1 through 11: All spills, except #6, #7 and #8, are listed in the
	Basewide EBS as closed/cleaned up. SPL-2763-6/7/8 do not include
	documentation on spill containment/cleanup, but each are fuel, less than
	five gallons, and in areas containing pavement (which would limit extent of
	spill/release. No concerns were noted during the VSI.
2787	SPL-2787-1/2: SPL-2787-1 was identified from VSI for Basewide EBS as
	a stained area from air-conditioning unit. No concerns or signs of staining
	noted during subsequent VSIs. SPL-2787-2 is listed in Basewide EBS (and
	NYSDEC Spill Register) as closed.
2818	SPL-2818: Six to eight gallons of jet fuel were cleaned up using roller
	sponge and absorbent pads.
2820	On June 16, 2000, a 200-gallon jet fuel spill occurred at Building 2820
	(NYSDEC Spill #0045040) during overfilling of an underground storage
	tank. The spill has been cleaned up and closed out by NYSDEC and is
	discussed further as part of IRP Site SS-029 in Section 5.2.1.
2824	SPL-2824-1/2: Minor petroleum spills (1.5 and 1.0 gallon each) on Arizona
	Road; both spills were cleaned up.
2827	SPL-2827-1/2/3: Spills of small quantities (less than five gallons) of diesel
	fuel, gasoline, and hydraulic fluid from maintenance of grounds
	equipment/vehicles. All three spills were cleaned up.
3020	SPL-3020-1/2: Both spills were cleaned up using absorbent materials.
3025	SPL-3025: Basewide EBS doesn't indicate how spill was cleaned up. Spill
	was two gallons of jet fuel from aircraft parked at nose dock. No concerns
	noted during the VSI.
3070, 3075, 3080	SPL-3070-1 through 81, SPL-3075-1 through 22, and SPL-3080-1 through
	13: All listed spills took place on the aircraft parking ramp. Most spills
	involved jet fuel from various aircraft operation and maintenance activities
	(SPL-3070-30/31/61/62 were hydraulic fluid leaks, SPL-3070-77 was
	Halon (used during an aircraft fire). The Basewide EBS indicates that most
	spills have been closed out, but that documentation is lacking for some
	spills. No concerns or signs of contamination were noted during the VSI,
	but the entire area is part of IRP Site SS-004, which is discussed in Section
2251	5.2.1.
3251	SPL 3251: Unknown quantity of caustic soda from three inactive fuel
	tanks. Tanks have been removed and area has been cleaned up as part of
2502	aircraft refueling system closure, which is discussed in Section 5.6.
3592	SPL-3592-1/2: Both spills pertained to an underground storage tank (UST)
	at this location. UST was removed and a site characterization completed
	(see Section 5.6) and spill (NYSDEC #8906522) has been closed out.

Table 5.3.1, Petroleum/Miscellaneous Materials Spills/Releases

Petroleum contamination is also present at several locations on this Property from the operation of oil/water separators, petroleum storage tanks, and petroleum handling facilities, as discussed in Sections 5.4 and 5.6 below.

**5.3.2** There are three IRP fuel sites and two petroleum product areas of concern located on portions of this Property.

<u>SS-008</u> is the airfield lighting electrical vault (Building 2704), covers an area of approximately 0.12 acres, located within the southeast portion of this Property, and shown at Attachment 1A. This site is a fuel site subject to the Resource Conservation and Recovery Act (RCRA), with oversight being provided by the NYSDEC Region 5, Spill Response Office. After initial sampling and investigation, it was determined that contamination on this site originated from non-point sources within SS-004. A no further action decision document was issued by the Air Force in July 1991, and regulatory concurrence has been received (1997). Data from this site has been incorporated into the Site SS-004 investigative activities.

<u>SS-009</u> is the refueling system fuel valve pit, covers an area of approximately 0.03 acres, located within the southeast corner of this Property, and shown at Attachment 1A. This site is a fuel spill site subject to the RCRA, with oversight being provided by the NYSDEC Region 5, Spill Response Office. The SI concluded that contamination on this site also originated from non-point sources within SS-004. The Air Force issued a no further action decision document in August 1991, and regulatory concurrence has been received (1997). Data from this site has been incorporated into the Site SS-004 investigative activities.

<u>SS-014</u> is the Alert Area, covers an area of approximately 37.75 acres, located partially within the northen portion of this Property, and shown at Attachment 1A. This site is a fuel spill site subject to the RCRA, with oversight being provided by the NYSDEC Region 5, Spill Response Office. Fuel spills were reported at the site. Large spills were reportedly contained and recovered, while small spills were washed into storm drains. After sampling and investigation, it was concluded that site contamination did not pose a health hazard. A decision document recommending no further action for the site was signed by the Air Force in September 1992. In March 1997, the NYSDEC Region 5, Environmental Quality Office issued a letter concurring that no further investigative or remedial work was necessary at the site.

**OTH-3240** is Pumphouse #3, formerly located on the west side of the aircraft parking ramp, in the south central portion of this Property, and shown at Attachment 1D. In November 1968, the pumphouse was destroyed by fire during which jet fuel may have been released. The USTs associated with Pumphouse #3 remained in use until 1994 when they were removed (the storage tanks and refueling system are discussed further in Section 5.6). In 2001, an investigation of the groundwater in the vicinity of Pumphouse #3 was conducted and it was concluded the petroleum contamination (approximately 11.1 parts per million (ppm) total BTEX at the source) originating from Pumphouse #3 is limited in extent to within 450 feet from the pumphouse and is likely in an equilibrium state, as evidenced by the likely age of the spill and high biological activity (indicated by oxygen-depleted conditions and lack of benzene

FOSET, Central Airfield, Former Plattsburgh AFB, April 2012 constituent). Because contaminants are not likely to migrate any further downgradient and groundwater is not likely to be utilized at this location in the future, active remediation was not recommended. The NYSDEC Region 5, Office of Environmental Quality concurred on December 4, 2001, and recommended groundwater monitoring every six months for at least two years. The initial groundwater monitoring has been completed, remaining remedial activities (monitoring) for the former Pumphouse #3 are being performed as part of the IRP Site FT-002 Fire Training Area/IA Groundwater OU (which includes this area, and is discussed Section 5.2.1). Most recent sampling, conducted in 2008, indicate total BTEX was detected at approximately 6.9 ppm (compared to 11.1 ppm that was detected during the initial sampling event in 2001). The relevant remedial action objective is 0.02 ppm.

The Mobil Gas Station Area of Concern (AOC) is located off-base directly west of IRP Site LF-023 and this Property, across US Route 22. Benzene, toluene, ethyl benzene, and xylene (BTEX) compounds were detected in monitoring well MW-23-008 and were determined to not be landfill derived. The Air Force contacted the NYSDEC, and it initiated an investigation of a possible off-base source. In April 1993, it was determined that there was BTEX contamination in the soil and groundwater downgradient of the Mobil Gas Station site. Groundwater monitoring is being conducted as part of the IRP LF-023 long-term monitoring program in order to assess the impact to on-base receptors, wetlands, and streams. As requested by the NYSDEC and NYSDOH, groundwater and soil vapor intrusion use restrictions, covering an area of approximately 29.81 acres have been placed on this area and are shown at Attachment 1J.

**5.3.3** There are two IRP fuel sites located adjacent to portions of this Property. Based on investigations, none of these sites have impacted the Property to be transferred. Listed below is a summary of the adjacent sites.

**SS-031** is the base Central Heating Plant, Building 2658, covers an area of approximately 1.57 acres, located east of this Property, and shown at Attachment 1A. This site is a fuel spill site subject to the RCRA, with oversight being provided by the NYSDEC Region 5, Spill Response Office. Numerous fuel oil spills have occurred in the fuel transfer area on the east side of the building, particularly around the 20,000-gallon UST (day tank). A field investigation was performed in 1994. The 20,000-gallon UST and approximately 1,200 cubic yards of contaminated soil were removed in July 1996. Additional sampling and evaluation were performed in 2007 and 2008. An air sparging and soil vapor extraction system was installed in 2009 and is currently in operation.

<u>SS-039</u> is the POL Fleet Vehicle Fuel Storage Area, covers an area of approximately 2.48 acres, located east of this Property, and shown at Attachment 1A. This site is a fuel spill site subject to the RCRA with oversight being provided by the NYSDEC Region 5, Spill Response Office. The original configuration, dating back to 1956, included three (3) 10,000-gallon ASTs, and two (2) 8,000- gallon and one (1) 12,000-gallon USTs but was upgraded several times; the final configuration (at base closure) was three (3) ASTs and five (5) USTs (two (2) of which were closed in-place). This area was designated an IRP site and a PA report was completed in 1994; no visual evidence of contamination was noted. The PA recommended no further action. Subsequent to the PA, all remaining tanks (three (3) ASTs and five (5) USTs), the supporting pumphouse, fill stands, containment area, and piping were closed and removed in 1996. Closure reports for the tank removals have been completed (April 1997) and submitted to NYSDEC Region 5. Regulatory concurrence has been received (1999).

### 5.4 Oil/Water Separators (and Grease Traps/Silver Recovery Units)

According to Tables F-1 and F-3 of the Basewide EBS, there have been several oil/water separators (OWSs), grease traps/silver recovery units, and other waste water systems associated with the Property. Closure reports have been completed for OWSs removed from Buildings 2700, 2763, 2815, and 3400, as part of the April 1997 Final Closure Report for Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks and Aboveground Storage Tanks (six volumes). Site characterizations have been completed for OWS locations associated with Buildings 2748, 2753, 2763, 2785, 2818 and 2827, as part of the April 1999 Final Site Characterization Report of Underground Storage Tanks (and Oil/Water Separators). These reports have been submitted to the NYSDEC Region 5, Spill Response Office. A summary of the systems associated with this property is presented in Table 5.4 below:

	, On water Separators, Grease Traps, and Silver Recovery Onits
Location	Comments
2700	OWS-2700: OWS has been removed. No concerns noted in Basewide EBS
	or during the VSI.
2710	SRU-2710: The silver recovery units at this building have been removed
	per previous SEBS. No concerns noted in the Basewide EBS, the previous
	SEBS or the VSI.
2748	OWS-2748-1/2/3: Per the SEBS, only two OWSs were associated with
	Building 2748; only one OWS is present (installed 1994 as replacement for
	previous unit). Site characterization has been completed for both locations;
	total volatile organic compound (VOC) groundwater contamination was
	less than 1 ppb and total semi-volatile organic compound (SVOC)
	groundwater contamination was 26 ppb. No concerns noted during the VSI.
2753	OWS-2753-1/2: Both oil/water separators have been removed. Site
	characterization of OWS-2753-2 detected no contamination; OWS-2753-1
	was not characterized, as the area was part of IRP Site SS-017 (see Section
	5.2.1). No concerns were noted during the VSI.

Table 5.4, Oil/Water Separators, Grease Traps, and Silver Recovery Units

	On water Separators, Orease Traps, and Silver Recovery Onits
Location	Comments
2763	OWS-2763-1/2/3: All three OWSs have been removed. Closure/site
	characterization data for OWS-2763-1/2 indicated all contamination was
	below action levels. Groundwater sampling done during the removal of
	OWS-2763-3 indicated total VOC contamination of approximately 76 ppb,
	primarily chlorinated solvents (approximately 59 ppb total). This area is
	within the IRP Site FT-002 Groundwater Operable Unit (see Section 5.2.1).
	During the VSI, two new OWSs (installed approximately 1999) were noted.
	One is in the northeast portion of the building, along the east wall; and the
	other is in the southwest portion of the building, along the west wall. The
	OWSs appeared to be very clean. There were no concerns noted during the
	VSI.
2774	OTH-2774. An acid neutralization pit was located on the west side of
	Building 2774. The pit and 45 cubic yards of soil were removed in 1996 (as
	part of the basewide UST and oil/water separator removal project). The
	excavated area was sampled for volatile and semi volatile organic
	compounds (VOCs and SVOCs), but there were no detections, and no
	further action was recommended. OTH-2774 is detailed in the April 1997
	Final Closure Report for Removal of Underground Storage Tanks,
	Oil/Water Separators, Septic Tanks, and Aboveground Storage Tanks. No
	concerns were noted during the VSI.
2774	OWS-2774-1/2: Both OWSs have been removed, and site characterization
	has been completed. Characterization results for OWS-2774-1 indicated
	slight exceedances in the groundwater for benzene, dichlorobenzenes, and
	phenols (total VOCs, approximately 350 ppb and total SVOCs,
	approximately 170 ppb). There were no exceedances associated with
	OWS-2774-2. This area is within the IRP Site FT-002 Fire training
	Area/IA Groundwater OU (see Section 5.2.1). No concerns were noted
	during the VSI.
2778	GT-2778: Was identified in as-built drawings, but not found during
	Basewide EBS, SEBS, or subsequent VSI. Grease trap appears to have
	been removed. No other concerns were noted during VSI.
2785	OWS-2785: Unit is still in place. Site characterization showed benzene
	and xylene at 1.0 and .2 ppb, respectively. No concerns were noted in
	Basewide EBS, SEBS, or during the VSI.
2797	GT-2797: Grease trap supported kitchen/dining facility at Building 2797.
	No concerns were noted in the Basewide EBS, SEBS, or during the VSI.
2802	SRU-2802 was removed, per VSI. No concerns were noted during the VSI.
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## Table 5.4, Oil/Water Separators, Grease Traps, and Silver Recovery Units

Location	Comments
2808	OWS-2808: OWS was identified from building drawings, but not found
	during Basewide EBS, SEBS, or subsequent VSI. No concerns were noted
	during the VSI.
2815	OWS-2815: OWS was removed; per the closure report, soil and
	groundwater sampling show no exceedances of New York State
	Groundwater Standards or recommended soil cleanup objectives. No
	concerns were noted during the VSI.
2818	OWS-2818-1/2: Both OWSs have been removed. Site characterization
	detected no contamination at OWS-2818-2. Groundwater contamination
	detected at OWS-2818-1 consisted of SVOCs only, totaling approximately
	125 ppb. No concerns were noted during the VSI.
2820	OWS-2820: This unit is still in place and is currently in use (by the
	building tenant, Wood Group Gas Turbines). This area is part of IRP Site
	SS-029 (see Section 5.2.1). No concerns were noted during the VSI.
2827	OWS-2827: The OWS is still in place and is currently in use (by the airport
	grounds maintenance department). Site characterization of the OWS
	location found .2 ppb toluene in the groundwater; no other contamination
	was detected. No concerns were noted during the VSI.
3400	OWS-3400: This OWS has been removed. The closure report indicates
	that trichloroethylene was detected in the soil. This is further addressed as
	part of IRP Site SS-027, which has been closed out as requiring no further
	action (and is discussed in Section 5.2.1). No concerns were noted during
	the VSI.

Table 5.4, Oil/Water Separators, Grease Traps, and Silver Recovery Units

The Transferee will be responsible for complying with any applicable Federal, state, and local environmental regulations and for obtaining any required permits for installation and operation of oil/water separators.

#### 5.5 Radioactive and Mixed Wastes

Per Section 3.3.8 of the Basewide EBS, radioactive sources were used and/or stored on this Property. No radioactive materials or wastes are known to have been disposed of on this Property. X-ray equipment was operated in Building 2802 (the Non-Destructive Inspection Shop); Cesium-137 and Plutonium-239 were used at Building 2801 (the Precision Measurement Equipment Laboratory) for equipment calibration; the x-ray equipment and radioactive sources have been removed. No concerns with these activities or locations were noted in the Basewide EBS.

### 5.6 Storage Tanks and Petroleum Handling Facilities.

There are several storage tanks and petroleum handling facilities associated with the Property. All but three underground storage tanks (located near Buildings 2820 and 2827) have

been removed; the UST at Building 2820 is being used by the building tenant, and the USTs at Building 2827 are being used by the airport grounds maintenance department. An aircraft refueling and fuel distribution system has also been removed. Most removal activities took place during the 1994-1997 time frame and are documented in the April 1997 Closure Report for Removal of Underground Storage Tanks and Aboveground Storage Tanks (6 volumes), the April 1999 Site Characterization Report of Underground Storage Tanks, and the May 2000 Aircraft Refueling System Closure Report (4 volumes). These reports have been submitted to the NYSDEC Region 5, Spill Response Office. In addition, numerous aboveground storage tanks have been installed (by tenants) throughout this property since the Basewide EBS. All storage tanks on this property are maintained by and the responsibility of the Clinton County Airport and/or their tenants. A summary of the storage tanks (and the aircraft refueling system) associated with this property is presented in Table 5.6 below:

Location	Comments
2700	A 5,000-gallon jet fuel AST was removed in 1996. No concerns were noted
	during the VSI.
2704	UST-2704, AST-2704: UST-2704 was a "bermed" diesel fuel tank that was
	replaced in 1996 by a 500-gallon, double-walled AST. In addition, AST-
	2704 is a 90-gallon diesel fuel "day" tank located within the generator
	inside the building. No concerns were noted in the Basewide EBS, SEBS,
	or during the VSI.
2712	A 275-gallon diesel AST seated within a concrete dike. No concerns were
	noted in the Basewide EBS, SEBS, or during the VSI. In 1999, a 275-
	gallon abandoned diesel fuel UST and approximately 110 cubic yards of
	soil were removed. Post removal site characterization indicated one soil
	exceedance (Benzo(a)pyrene at 42 ppb), but no groundwater exceedances.
	A closure report has been completed and submitted to NYSDEC Region 5.
2716, 2736, 2738,	Each location had a 500-gallon, double-walled heating fuel AST (ASTs at
2748, 2786, 2802	2716, 2748, and 2786 were installed in 1998; ASTs at 2736, 2738, and 2802
	were installed in 2002). During the January 2010 VSI, it was noted that
	only the AST at 2748 was still present and the other five ASTs have been
	removed. No concerns were noted during the VSI.
2749	AST-2749 is a 275-gallon diesel AST seated within a concrete dike. No
	concerns were noted in the Basewide EBS, SEBS, or during the VSI.
2752	Three ASTs (2752-1/2/3) and one UST (UST-2752) are associated with the
	two generators supporting Building 2750. AST-2752-2/3 are 200- and 75-
	gallon diesel tanks mounted internal to the east generator. AST-2752-1 was
	a 275-gallon diesel AST that supported the west generator and was replaced
	in 1988 by a 1,000-gallon UST (UST-2752). UST-2752 was removed in
	1996. The closure report shows VOC contamination in the soil and
	groundwater, but below cleanup levels. No concerns noted during the VSI.

Table 5.6, Storage Tanks

Lacetter	Table 5.6, Storage Tanks
Location	Comments
2753	AST-2753-1/2: Two 275-gallon heating fuel tanks were located here in
	1996, but removed in 1997. A 2,000-gallon, double-walled heating fuel
	AST was installed in 1998, but has been removed as of the January 2010
07(2	VSI. No concerns were noted during the VSI.
2763	AST-2763 was a 10,000-gallon AST inside Building 2763 that stored
	detergent for aircraft washing; tank has been removed (approximately 1999)
	per the VSI. In addition, a 1,000-gallon, double-walled heating fuel AST
	was installed in 1998, but has been removed as of the January 2010 VSI.
0764	No concerns were noted during the VSI.
2764	AST-2764 was a 275-gallon diesel fuel AST and was removed in 1995. No
077.1	concerns were noted during the VSI.
2774	UST-2774: The Basewide EBS indicated a 500-gallon jet fuel UST may
	have been present on south side of the building. Review of storage tank
	records indicates this tank was a 550-gallon UST located on the west side of
	the building and was removed in the early 1990s (prior to 1994). A site
	assessment was completed in September 1995 (and submitted to NYSDEC
	Region 5) and indicated no contamination present. In addition, a 2,000-
	gallon, double-walled heating fuel AST was installed in 1998, but has been
	removed as of the January 2010 VSI. No concerns were noted during the
2779	VSI.
2119	AST-2779-1/2/3/4: Four diesel fuel ASTs support pumps for the deluge fire suppression system that supports Building 2763 (main hangar). Deluge
	system/Building 2779 was upgraded in 2000 and consisted of a 1,000-
	gallon AST, four 275-gallon ASTs, and one 50-gallon AST. All ASTs
	contain diesel fuel. Building 2779 and all ASTs were demolished/removed
	in January 2012. No concerns noted during VSI.
2784, 2801	Each location has a 1,000-gallon, double-walled heating fuel AST; the
2707, 2001	ASTs were installed in 1999, but have been removed as of the January 2010
	VSI. No concerns noted during the VSI.
2790	AST-2790-1/2: Two 25,000-gallon fiberglass ASTs within a concrete dike.
	ASTs were used for storage of deicing fluid and are still in place, but not in
	use. No concerns were noted during the VSI.
2811, 2812	UST-2811-A-1/A-2 and UST-2812-A-1/A-2: Two 6,000-gallon USTs
,	(replaced two predecessor 5,000-gallon USTs). One tank stored jet fuel and
	the other stored gasoline; both tanks were removed in 1996. Soil and
	groundwater sampling conducted during the tank removal showed no soil
	contamination above cleanup levels; groundwater contained BTEX at 26.5
	ppb total (this area is part of the IRP Site FT-002 groundwater operable unit
	and is discussed in Section 5.2.1). No concerns were noted during the VSI.

## Table 5.6, Storage Tanks

Location	Table 5.6, Storage Tanks     Comments
2815	AST-2815-1/2: Two 5,000-gallon diesel fuel ASTs were identified in the
2013	Basewide EBS based on historical records and appear to have been replaced
	by UST-2811/2812. In addition, a 1,000-gallon, double-walled heating fuel
	AST was installed in 1998, but has been removed as of the January 2010
	VSI. No concerns were noted during the VSI.
2820	UST-2820-A/B/C/D: UST-2820-A was a 500-gallon heating fuel tank and
	has been removed. UST-2820-B was a 5,000-gallon jet fuel tank and was
	replaced by UST-2820-C. UST-2820-C is a 6,000-gallon, double-walled jet
	fuel storage tank and was removed in December 2009. UST-2820-D is a
	550-gallon, double-walled tank supporting an oil/water separator and is still
	in use, by the building tenant (the Wood Group). This area has been
	investigated as IRP Site SS-029 (no further action required) and is
	discussed further in Section 5.2.1. In addition, three ASTs are also present;
	two are 275-gallon heating tanks and the other is a 10,000-gallon jet fuel
	storage tank. No concerns were noted during the VSI.
2827	UST-2826-A-1/A-2 and B-1/B-2: Two 6,000-gallon, double-walled USTs
	for storage of gasoline and diesel fuel. UST-2826-A-2 and B-2 replaced
	two predecessor USTs and are still in use, by the airport in support of
	grounds maintenance. Site characterization was completed in 1995 and
	found no contamination in the groundwater above action levels. In
	addition, an underground 9,000-gallon propane tank (OST-2827) is also still
2836	in use. No concerns were noted during the VSI. OST-2836-1/2/3/4: Two 2,000-gallon and two 5,000-gallon liquid oxygen
2030	and liquid nitrogen tanks; all tanks have been removed. No concerns were
	noted during the VSI.
3070	Aboveground fuel farms: There are two aboveground fuel farms within the
5070	southern portion of the aircraft parking ramp; located west of Building 2714
	(installed approximately 2001) and west of Building 2766 (installed
	approximately 2006). Each fuel farm contains three 20,000-gallon jet fuel
	ASTs and one 3,000-gallon gasoline AST. No concerns were noted during
	the VSI.
3218	UST-3218 and AST-3218: UST-3218 was a 550-gallon diesel fuel tank and
	was removed in 1996; no contamination was found during post excavation
	sampling. AST-3218 is a 50-gallon diesel generator fuel tank. No concerns
	were noted during the VSI.
3227	AST-3227-1/2: AST-3227-1 was a 275-gallon diesel fuel tank and was
	removed in 1996; there were no signs of contamination during AST
	removal. AST-3227-2 was a portable generator internal fuel tank (size is
	unknown); the generator has been removed. There were no concerns with
	either location during the VSI.

## Table 5.6, Storage Tanks

	Table 5.6, Storage Tanks
Location	Comments
3220, 3230, 3240,	UST-3221-A through G, UST-3231-A-G, UST-3241-A-G, UST-3251-A
3250, 3260, 3270,	through C, UST-3261-A-G, UST-3271-A through G, UST-3281-A through
3280, 3285	G, UST-3288-A through G (52 USTs total): These tanks were all jet fuel
	USTs that supported the former aircraft refueling system and were
	organized around eight pumphouses formerly located along the west side of
	the aircraft parking ramp. Pumphouse # 4 (3250) had two 50,000-gallon
	and one 2,000-gallon UST and all other pumphouses had six 50,000-gallon
	USTs and one 2,000-gallon UST at each location. All USTs, pumphouses,
	associated piping, and approximately 17,350 cubic yards of soil were
	removed in 1993-1996. Site sampling/characterization was performed and
	a closure report completed in May 2000. See discussion of the Aircraft
	Refueling System immediately following this table.
3222, 3232, 3262,	AST-3222, AST-3232, AST-3262, AST-3282, AST-3287: Each AST was a
3282, 3287	240-gallon internal diesel fuel tank for emergency power generators that
	supported the refueling system pumphouses (Nos. 1, 2, 5, 7 and 8). All
	tanks, generators, and buildings were removed as part of the aircraft
	refueling system closure.
3288	A 275-gallon diesel fuel AST; the tank was in place, and no concerns were
	noted in the Basewide EBS or previous SEBS. The tank has since been
	removed. During a previous VSI and subsequent exploratory excavation, a
	UST was discovered. Subsequent review of as-builts indicated a 275-gallon
	diesel fuel UST was originally installed during construction of the building
	(approximately 1956). Tank and approximately 3 cubic yards of soil have
	been removed, and site closure report recommending no further action has
	been submitted to NYSDEC Region 5. No concerns were noted during the
- 10.0	VSI.
3400	AST-3400, UST-3400: UST-3400 was a 500-gallon heating fuel tank
	removed in 1990; no contamination was noted during removal or in the
	1999 site characterization report. AST-3400 was a 500-gallon heating fuel
	tank that was removed in 1995; no contamination was noted in the April
2502	1997 closure report. No concerns were noted during the VSI.
3592	UST-3592 was a 550-gallon heating fuel tank that was removed in 1990.
	Basewide EBS identifies two spills associated with this tank (SPL-3592-
	1/2; see Section 5.3.1) and indicates this tank may have leaked. The 1999
	site characterization report noted only trace VOCs (less than 1 ppb total) and SVOCs (less than 5 pph total) in the groundwater and the spill
	and SVOCs (less than 5 ppb total) in the groundwater, and the spill
	(NYSDEC #8906522) has been closed out. No concerns were noted during the VSL
	the VSI.

#### Aircraft Refueling System (POL-1000-1/2/3, POL-1000-6, POL-

3221/3231/3241/3251/3261/3271/3281/3286): An aircraft fuel distribution system was operated on this property from the 1950s until base closure in 1995, dismantled in 1996, and officially closed in 2000. The refueling system consisted of eight pumphouses with underground storage tanks (identified and discussed in Table 5.6 above) located along the western edge of the aircraft parking ramp with 22 lateral fuel distribution lines running underneath the ramp from west to east. The system also included a bulk fuels storage area east of the airfield (and this property) and fuel transfer pipelines that connected the bulk fuels storage area to the pumphouses and lateral fuel distribution lines under the aircraft parking ramp. The Aircraft Refueling System is shown at Attachment 1F. The pumphouses, all tanks, and pipelines along the west and south edge of the ramp have been removed. The fuel laterals under the ramp and the sections of pipeline under aircraft pavement were filled with grout. The section of pipeline between the bulk fuels storage area and the flightline was closed in place. Sampling and investigation of each component are detailed in the May 2000 Aircraft Refueling System. Additional investigation of Pumphouse #3 was completed in 2001 (and is discussed in Section 5.3.2). The Aircraft Refueling System has also been evaluated as part of the RI for IRP Site SS-004 (discussed in Section 5.2.1).

The Transferee will be responsible for complying with any applicable Federal, state, and local laws relating to the operation, maintenance, and removal of these storage tanks.

#### 5.7 Pesticides

No pesticides are known to have been stored on this property. Pesticides were applied in accordance with manufacturer's guidance, and no release above action levels is known to have occurred on the Property, 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 that may have been used in this area.

#### 5.8 Asbestos

A limited Basewide Asbestos Survey has been completed and is summarized in Table H-1a of the Basewide EBS. A follow-up Asbestos Assessment/Inspection Report (2 volumes) was completed in October 2001. Repairs of deteriorated friable asbestos were made and documented in the March 2003 Report on Repair of Damaged Asbestos-Containing Material (ACM) at selected industrial structures. A summary of all facilities with ACM and the ACM condition is presented in Table 5.8 below:

LocationComments2704One of three homogeneous areas tested contains ACM (cove base mastic). No concerns were noted during the VSI.2710Five homogeneous areas contain ACM: carpet mastic, floor tile, pipe insulation and mudded fittings. The October 2001 assessment noted damaged pipe insulati in the mechanical room. The damaged ACM was repaired per the 2003 repair report. No concerns were noted during the VSI.2712Eleven homogeneous areas contain ACM: floor tile, mastic, pipe insulation, window caulking, and mudded fittings in Room 18, and damaged window caulking. The damaged ACM was repaired per the 2003 repair report. No concerns were noted during the VSI.2714Twelve homogeneous areas contain ACM: floor tile, mastic, pipe insulation, an mudded fittings. No concerns were noted during the VSI.2714Twelve homogeneous areas contain ACM: floor tile, mastic, pipe insulation, an mudded fittings. No concerns were noted during the VSI.2716The only ACM present was white grout for green wall tile. No concerns were noted during the VSI.	
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2716 The only ACM present was white grout for green wall tile. No concerns were	
2720 Two homogeneous areas contain ACM: floor tile. No concerns were noted dur	ıg
the VSI.	
2736 Sixteen homogeneous areas contain ACM: floor tile, mastic, pipe insulation,	
mudded fittings, and transite board. No concerns were noted during the VSI.	
2738 Twenty-one homogeneous areas contain ACM: floor tile, mastic, pipe insulation	
mudded fittings, and transite board. The October 2001 assessment noted damag	d
mudded fittings in Rooms 7 and 20. The damaged ACM was repaired per the 2003 repair report. No concerns were noted during the VSI.	
2741 Seven homogeneous areas contain asbestos, including two types of floor tile, tw	
sizes of mudded pipe fitting insulation, and three types of pipe insulation. No	
concerns were noted during the VSI.	
2748 Twelve homogeneous areas contain ACM: floor tile, mastic, pipe insulation,	
mudded fittings, glue-on ceiling tile, and exterior siding. The October 2001	
assessment noted deteriorated pipe insulation and ceiling tile in Room 22. No	
deteriorated ACM was seen during the VSI (this section of the building has been	
recently renovated).	
2749 The only ACM present is the insulation for the generator exhaust pipe. No	
concerns were noted during the VSI.2750Ten homogeneous areas contain ACM: floor tile, mastic, pipe insulation, and	
furnace gasket. The October 2001 assessment noted deteriorated water pipe	
insulation in the mechanical room. The insulation is friable per the assessment	
report, but is contained within the mechanical room, and the building is	
unoccupied. The damaged ACM is still present per the VSI.	

Table 5.8, Asbestos-Containing Materials (ACM)

Table 5.8, Asbestos-Containing Materials (ACM)	
Location	Comments
2753	Twenty-six homogeneous areas contain asbestos, ten types of floor tile, ten types of mastic for floor tile, four sizes of mudded pipe fitting insulation, and two sizes of pipe insulation. No concerns were noted during the VSI.
2763	Fifty-three homogeneous areas contain asbestos, including eighteen types of floor tile; twenty-one types of mastic for floor, ceiling, and wall tiles; building exterior tar coating; transite board; five sizes of mudded pipe fitting insulation; six sizes of pipe insulation; and hot water tank insulation. No concerns were noted during the VSI.
2766	The only ACM present is pipe insulation and mudded fittings, both of which were noted as damaged in the October 2001 assessment, but appear to have been repaired or removed. No concerns were noted during the VSI.
2774	Fifteen homogeneous areas contain ACM, including seven types of floor tile, mastic and grout for floor tile, five types of thermal system insulation (TSI), and sprayed-on exterior building insulation. No concerns were noted during the VSI.
2778	Thirty-three homogeneous areas contain asbestos, including nine types of floor tile, cove base mastic, nine types of mastic for floor tile, transite board, duct insulation, four sizes of mudded pipe fitting insulation, four sizes of pipe insulation, and four types of hot water tank insulation. The October 2001 assessment noted deteriorated insulation and mudded fittings in several areas. The damaged ACM has been repaired per the 2003 repair report. No concerns were noted during the VSI.
2779	Two homogeneous areas contain asbestos and include block pipe and block fitting thermal insulation. No concerns were noted during the VSI.
2784	Twelve homogeneous areas contain asbestos, including two types of floor tile transite board, duct insulation, three sizes of mudded pipe fitting insulation, three sizes of pipe insulation, and two types of hot water tank insulation. The October 2001 assessment noted damaged insulation and mudded fittings in several locations, but appears to have been repaired or removed. No concerns were noted during the VSI.
2785	Twenty-seven homogeneous areas contain asbestos, including eleven types of floor tile, ceramic wall tile grout, nine types of mastic for floor tile, two types of mudded pipe fitting insulation, two types of pipe insulation, window putty, and floor coating. The October 2001 assessment noted that the floor coating was deteriorated, but appears to have been removed. No concerns were noted during the VSI.
2786	Eleven homogeneous areas contain asbestos, including two types of floor tile, two types of mastic for floor tile, transite board, duct insulation, two sizes of mudded pipe fitting insulation, two sizes of pipe insulation, and hot water tank insulation. The VSI noted damaged floor tile. The floor tile is non-friable and not hazardous, and the building is unoccupied. No other concerns were noted during the VSI.

## Table 5.8, Asbestos-Containing Materials (ACM)

	Table 5.8, Asbestos-Containing Materials (ACM)
Location	Comments
2787	Twelve homogeneous areas contain asbestos, including three types of floor tile, three types of mastic for floor tile, transite board, mudded pipe fitting insulation,
	two types of pipe insulation, and two types of tank covering insulation. The
	October 2001 assessment noted deteriorated insulation and mudded fittings in
	Room 4 and 22. The damaged ACM has been repaired per the 2003 repair report.
	No concerns were noted during the VSI.
2793	Four homogeneous areas contain asbestos, including ceramic floor tile grout and
	three types of pipe and fitting insulation. No concerns were noted during the VSI.
2796	Three homogeneous areas contain asbestos, including mudded pipe fitting
	insulation and two sizes of pipe insulation. No concerns were noted during the VSI.
2797	Ten homogeneous areas contain asbestos, including two types of floor tile, four
	types of mastic for carpet and floor tile, mudded pipe fitting insulation and pipe
	insulation. The October 2001 assessment noted deteriorated pipe insulation and
	mudded fittings in Rooms 5, 7, 14, and 15. The damaged ACM has been repaired
	per the 2003 repair report. The VSI noted damaged floor tile. The floor tile is
	non-friable and not hazardous, and the building is unoccupied. No other concerns
	were noted during the VSI.
2801	Twenty homogeneous areas containing ACM were identified and include eleven
	types of TSI, six types of floor tile, two types of mastic for floor tile, and one type
	of mastic for carpet. No concerns were noted during the VSI.
2802	Six homogeneous areas contain asbestos, including two types of floor tile, mastic
	for floor tile, heat exchanger insulation, and two types of pipe insulation. The
	October 2001 assessment noted damaged floor tile. The floor tile is non-friable
	and not hazardous, per the assessment report. During the VSI, some of the floor
	tile appeared to be buckled or loose; the building is unoccupied. No other
2000	concerns were noted.
2808	Ten homogeneous areas contain asbestos, including three types of floor tile, two
	types of floor tile mastic, two types of mudded pipe fitting insulation, and three types of nine insulation. No concerns were noted per the VSL
2015	types of pipe insulation. No concerns were noted per the VSI.
2815	Six homogeneous areas contain ACM: three types of floor tile, two types of floor tile mastic and stair trade. No concerns were noted during the VSI
2818	tile mastic, and stair treads. No concerns were noted during the VSI.
2010	Fourteen homogeneous areas contain asbestos, including window caulk, seven turnes of floor tile, grout for coronic wall tile, mastic for floor tile, mudded pipe
	types of floor tile, grout for ceramic wall tile, mastic for floor tile, mudded pipe fitting insulation, and three types of pipe insulation. The VSI neted demaged floor
	fitting insulation, and three types of pipe insulation. The VSI noted damaged floor tile. The floor tile is non frichle and not begardous, and the building is
	tile. The floor tile is non-friable and not hazardous, and the building is unoccupied. No other concerns were noted during the VSI.
2820	
2820	Six homogeneous areas containing ACM have been identified and include three turnes of thermal system insulation, floor tile, and mastic for floor tile. No
	types of thermal system insulation, floor tile, and mastic for floor tile. No
	concerns were noted during the VSI.

## Table 5.8, Asbestos-Containing Materials (ACM)

Location	Comments
3288	Two of four homogeneous areas tested contain ACM: transite board and exhaust
	insulation. The October 2001 assessment noted deteriorated transite board,
	including a three square feet of deteriorated transite board on the ground. During
	the VSI, the building was noted as unoccupied. The exhaust insulation was not
	present and the deteriorated transite board was not seen on the ground; both appear
	to have been removed. The remaining transite is deteriorated, but is non-friable
	and not hazardous, per the assessment report.
3400	The only ACM present was floor tiles and mudded fittings. The October 2001
	assessment noted damaged floor tiles. The damaged floor tile was still present
	during the VSI. The floor tile is non-friable and not hazardous, and the building is
	unoccupied. No other concerns were noted.
3592	Three homogeneous areas contain ACM: floor tile, transite, and window putty.
	The October 2001 assessment noted damaged, deteriorated window putty in
	various locations. The deteriorated ACM was repaired per the 2003 repair report.
	The VSI noted damaged floor tile. The floor tile is non-friable and not hazardous,
	and the building is unoccupied. No other concerns were noted during the VSI.

Table 5.8, Asbestos-Containing Materials (ACM)

The Property to be conveyed contains ACM. ACM in Structures or Buildings: Based on an inspection of the Property and a review of the environmental baseline survey reports, damaged ACM is present in Buildings 2750, 2786, 2797, 2802, 2818, 3288, 3400, and 3592; all buildings are currently unoccupied. The damaged ACM in Buildings 2786, 2797, 2802, 2818, 3288, 3400, and 3592 is non-friable and not hazardous. The damaged ACM in Building 2750 is friable, but is limited, and contained within the building's mechanical room, and the building is unoccupied. The transferee will be responsible for abating the damaged ACM prior to using Buildings 2750, 2786, 2797, 2802, 2818, 3288, 3400, and 3592. The ACM in structures on the remainder of 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 and above 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 and above 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 Transferee that the Air Force will not be responsible for the ACM in or on 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.

The Deed will contain a provision stating that the property recipient and subsequent transferees, in their use and occupancy of the property, will be required to comply 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 which have been 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.

### **5.9 Drinking Water Quality**

Potable water is available throughout this Property via an existing City of Plattsburgh municipal water distribution system (operated by the Town of Plattsburgh). The non-potable groundwater contains contamination from several IRP sites. Groundwater use restrictions are in effect for the areas of IRP Sites FT-002 (both operable units), SS-005, SS-006 LF-023, and the Mobil Gas Station Plume, and are discussed in Sections 5.2.1 and 5.3.2.

The Transferee shall be restricted from withdrawal and use of groundwater within the areas of IRP Sites FT-002, SS-005, SS-006, LF-023, and the Mobil Gas Station Plume, as indicated and shown at Attachments 1E through 1J.

### 5.10 Indoor Air Quality

The potential for vapor intrusion into buildings on this Property may be present due to contamination associated with IRP Sites FT-002 (Source and Groundwater OUs), and the Mobil Gas Station Plume, which are discussed in Sections 5.2.1 (FT-002) and 5.3.2 (Mobil Gas Station Plume) above.

Vapor Intrusion has been evaluated as part of the human health risk assessment for the Fire Training Area (FT-002)/IA Groundwater OU. The human health risk assessment for the Fire Training Area (FT-002)/IA Groundwater OU has found no excess risk associated with the vapor intrusion pathway based on modeling. However, an evaluation of soil vapor intrusion

(SVI) into buildings within the IRP Site FT-002 Fire Training Area/IA groundwater contamination plume has been performed in 2006 and 2007, and a Soil Vapor Intrusion Survey Data Summary Report was completed December 2008. Supplemental evaluations were performed in 2008, 2009, and 2010. A Supplemental Soil Vapor Intrusion Survey Data Summary Report, for the 2008 evaluation was completed in May 2009, and a report detailing the results of the 2009 and 2010 evaluation was completed in December 2010. Results of the sampling and investigation of the following buildings in the FT-002/IA Groundwater OU are provided below.

<u>Building 2753</u> was sampled for sub-slab soil gas vapors in 2006 and Trichloroethylene (TCE) was detected at a concentration of 18,000 micrograms per cubic meter ( $\mu$ g/m<sup>3</sup>) in the northern portion of the building. Indoor air was also sampled, in 2007; chlorinated solvents (PCE and/or TCE) were detected at all locations, but at concentrations less than 1.62  $\mu$ g/m<sup>3</sup> (total chlorinated solvents), but may have been a result of the industrial use of the building for aircraft maintenance activities. A soil vapor extraction (SVE) system has been installed to address subsurface soil gas contamination under the northern portion of the building, and has been in operation since December 2009. Sub-slab soil gas sampling was conducted in November 2010, at the same locations as the 2006 sampling event, to assess the remediation progress since activation of the SVE system. The highest detected concentration was 620  $\mu$ g/m<sup>3</sup> (TCE), which was at the same location where 18,000  $\mu$ g/m<sup>3</sup> was detected in 2006. All other TCE, and all PCE, detections were less than their corresponding 2006 sampling results. Operation of the SVE system is still ongoing.

<u>Building 2763</u> was sampled for sub-slab soil gas vapors in 2006 and 2009. In the 2006 sampling event, Tetrachloroethene (PCE) was detected at four (4) out of five (5) locations, at concentrations up to 150  $\mu$ g/m<sup>3</sup>. TCE was detected at three (3) out of five (5) locations, and was detected at concentrations above 100  $\mu$ g/m<sup>3</sup> at two (2) of these locations. Building 2763 was resampled in 2009 (at the same locations as sampled in 2006), in consultation with the NYSDEC and USEPA, to determine if concentrations are decreasing similar to the decreases in the FT-002 groundwater contamination that are occurring in this area. In the 2009 sampling event, PCE was detected at only two (2) locations, and no higher than 5.3  $\mu$ g/m<sup>3</sup>; TCE was still detected at three (3) locations, but no higher than 12  $\mu$ g/m<sup>3</sup>. Indoor air was also sampled, in 2007 and 2009; PCE was detected at 0.75  $\mu$ g/m<sup>3</sup> at one location in 2007, and there were no detections during the 2009 sampling event. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2766</u> was sampled for sub-slab soil gas vapors in 2006, 2008 and 2009. In the 2006 sampling event, TCE was detected at all three (3) locations, at concentrations up to 4,400  $\mu$ g/m<sup>3</sup>. In the 2008 sampling event (which included the three (3) original locations, and four (4) additional locations) TCE was detected at all locations but at much lower concentrations (the maximum concentration was 510  $\mu$ g/m<sup>3</sup>. In the 2009 sampling event, TCE was again detected at all locations, but at higher concentrations than were detected in 2008 (the highest detected concentration was 1,200  $\mu$ g/m<sup>3</sup>). Indoor air was also sampled, in 2007 and 2008, but there were no detections. Installation of a soil vapor extraction system, to address subsurface soil gas

FOSET, Central Airfield, Former Plattsburgh AFB, April 2012 contamination was recommended, and a soil vapor extraction system has been constructed and been in operation since December 2010. Operation of the SVE system is still ongoing.

<u>Building 2786</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Benzene, Ethylbenzene, and o-Xylene were detected in the sub-slab soil gas at 0.89, 0.96, and 1.6  $\mu$ g/m<sup>3</sup> respectively at one location, but were not detected at the other location. Toluene was detected at 2.4 and 1.2  $\mu$ g/m<sup>3</sup> at the two sample locations. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2786. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

Building 2793 was sampled for sub-slab soil-gas vapors in 2006 and 2009; in addition, a soil and groundwater investigation was conducted in 2008. In the 2006 sampling event, chlorinated solvents (TCE and PCE) were not detected; however, petroleum compounds Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) were detected at all three (3) locations at concentrations of 2,437 - 14,445  $\mu$ g/m<sup>3</sup> (total BTEX). Indoor air sampling was conducted in 2007, and BTEX compounds were detected at all five (5) locations at concentrations up to 12.1  $\mu g/m^3$ ; however, the same compounds were also found in the various chemicals and fuels being used in the building (as part of the building's use for aircraft storage and maintenance) and therefore their presence was not likely attributable to soil vapor intrusion. A soil and groundwater investigation was conducted in 2008 to determine if there is a source of contamination present that is causing the high levels of BTEX in the sub-slab soil gas. The 2008 soil and groundwater investigation found no source of contamination but recommended resampling the sub-slab soil gas to verify the results of the 2006 sampling event. The 2009 sampling event found significant reductions in BTEX concentrations at two (2) locations, the total BTEX concentrations detected at the third location was in excess of 48,000  $\mu$ g/m<sup>3</sup>, even though soil and groundwater sampling, via geo-probe, of this very location six months earlier did not detect BTEX. Additional sampling has been performed (March 2010); a sub-slab soil gas sample was collected at the location of the potentially anomalous result from March 2009, and several other locations throughout the building. The total concentration of BTEX in each sample was less than 100  $\mu$ g/m<sup>3</sup>, which confirms that the March 2009 result was likely anomalous. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2796</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Toluene was detected at 1.5 and 3.8  $\mu$ g/m<sup>3</sup> at the two sample locations. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2796. Based on the sampling results there appears to be limited potential for soil vapor intrusion. However, as a precaution due to its location over the groundwater contamination plume, Building 2796 is subject to a Non-Residential Use Restriction and a Soil Vapor Intrusion Restriction as shown at Attachments 1A-2 and 1A-3, and as described at Attachments 1F-1 and 1F-2.

<u>Building 2797</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Toluene and m,p-Xylene

were detected in the sub-slab soil gas at 1.4 and 2.5  $\mu$ g/m<sup>3</sup> respectively at one location, but were not detected at the other location. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2797. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

The seven buildings discussed above are among other facilities located within the boundaries as shown at Attachments 1A-2 and 1A-3 that will be subjected to the agreed upon non-residential use and SVI restrictions as stated in the February 2012 AFRPA letter. The Institutional Controls, and a Non-Residential Use restriction, to address the potential soil vapor intrusion pathway have been identified as part of the planned remedy for the Fire Training Area (FT-002)/IA Groundwater OU and are further detailed at Attachments 1F-1 (as shown within the green line) and 1F-2 (as shown within the blue line).

In addition, the LUC/ICs for IRP Site FT-002 Source OU, and the Mobil Gas Station Plume include an institutional control addressing the potential risk from vapor intrusion as detailed at Attachments 1E and 1J.

# 5.11 Lead-Based Paint (LBP), Other Facilities

LBP and/or LBP hazards may be present in the facilities built prior to 1978; none of these buildings are residential. The Transferee will be notified of the possible presence of LBP and/or LBP hazards in these facilities through the supporting EBS documentation and SEBS. Notice will be provided to the Transferee in the Deed that the Transferee will be responsible for managing all LBP and potential LBP in compliance with all applicable laws and regulations.

# 5.12 Lead-Based Paint and Lead-Based Paint-Containing Materials and Debris (collectively "LBP")

Lead-based paint was commonly used prior to 1978 and may be located on the Property. The Transferee is advised to exercise caution during any use of the Property that may result in exposure to LBP. Appropriate notification and transferees responsibilities, consistent with Air Force Real Property Agency (AFRPA) policy, will be provided in the Deed relative to this fact of common use of LBP prior to 1978.

#### **5.13** Polychlorinated Biphenyls (PCBs)

An inventory/sampling of all base electrical distribution system equipment for PCBs was conducted in 1994; all equipment containing PCBs above 50 ppm has been removed. Per the Basewide EBS (Table H-2) electrical transformers containing over 500 ppm, PCBs were used at/near Buildings 2753 and 2763; transformers containing between 50 and 500 ppm PCBs were used/stored at/near Buildings 2720, 2766, 2775, 2778, 2779, 2801, 2802, 3250, and 3400. Per the supplemental evaluation report, no contamination was found at the former PCB transformer locations near Buildings 2720 and 2766. Minor soil contamination was detected at transformer sites near/associated with Facilities 2763, 2775, 2778, 2801, 2802 and 3400, but no additional

actions were necessary based on comparison to soil guidelines in NYSDEC Soil TAGM HRW-94-4046. Based on results/recommendations in the May 2001 supplemental evaluation report, approximately 20.7 tons of soil adjacent to transformers near Buildings 2753, and 3250 was removed in September - October 2002; confirmatory sampling and a closure report, recommending no further action, has been completed (as part of the February 2005 Closure Report for Investigation and/or Remediation of Miscellaneous EBS Factors).

The Transferee will be notified (Attachments 3 and 4) of these PCB issues and the dates that the usage/storage/release took place.

# 5.14 Air Conformity/Air Permits.

Table F-1 of the November 1995 EIS indicates that there were Air Emissions Permits for aircraft spray painting in Buildings 2741, and 2763; operation of paint booths in Building 2753; and operation of a plastic media blasting booth in Building 2753. All of these permits have been closed out; however, the paint booth and plastic media blasting booth are still present in Building 2753, and no concerns with the equipment were noted during the VSI.

The Transferee will be responsible for complying with any applicable Federal, state, local laws relating air emissions or the operation of equipment associated with the facilities on this Property.

# 5.15 Sanitary Sewer Systems.

The area east of the aircraft parking ramp is serviced by a sanitary sewer system (which discharges into the City of Plattsburgh treatment facility). Sanitary sewer service is not available on the aircraft parking ramp, or the property west of the aircraft parking ramp (see discussion of septic tanks in Section 5.16 below).

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

### 5.16 Sensitive Habitat and Wetlands.

Wetlands are present on this property to the east and southeast of Building 2700. The Transferee will be notified of the locations of the sensitive habitats and wetlands and will be responsible for assuring that no actions are taken which would adversely affect these areas. Any development affecting the wetlands will be subject to Section 404 of the Clean Water Act and any applicable state or local laws and regulations.

# 5.17 Septic Tanks (Waste Water).

The airfield, and area west of the runway are not serviced by a sanitary sewer system; waste water disposal in these areas was previously via septic tanks and leach fields. All septic tanks and associated leach fields have been removed and are documented in the April 1997 Closure Report for Removal of Underground Storage Tanks and Aboveground Storage Tanks (6 volumes). A summary and status of all septic tanks associated with property is provided in Table 5.16 below; additional information can be found in Table F-2 of the Basewide EBS.

	Table 5.16, Septic Tanks/Systems
Location	Comments
3226	SPT-3226: A 550-gallon septic tank and leach field supported Building 3225,
	a ground control approach facility. The system was removed in 1996. No
	contamination was noted in the April 1997 closure report or during the VSI.
3401	SPT-3401: A 1,000-gallon septic tank and drain field supported Building
	3400. This area is part of IRP Site SS-027, which has been closed out (see
	Section 5.2). The system was removed in 1996. No contamination was noted
	in the April 1997 closure report or during the VSI.

# Table 5.16, Septic Tanks/Systems

The Transferee will be responsible for complying with all applicable laws and regulations pertaining to installation and operation of septic tanks or discharge of sanitary waste.

# 5.18 Solid Waste.

An area of solid waste disposal exists within the boundaries of this Property. A domestic waste landfill was operated from 1966 to 1981 in the northwest portion of this Property, is IRP Site LF-023, and discussed in Section 5.2.1. The Transferee will be required to comply with the restrictions identified in Section 5.2.1.

# 5.19 Threatened and Endangered Species.

Per Section 3.4.5.3 of the Basewide EIS, there are no federal-listed threatened, endangered, or candidate plant or wildlife species on Plattsburgh AFB. There are four statelisted bird species that have been observed on or near the Property: the northern harrier and the osprey, listed as "threatened"; the great blue heron, listed as "protected"; and the grasshopper sparrow, listed as a "species of special concern". The EIS further notes that a colony of grasshopper sparrows is present in the flightline grassland.

New York State listed species are present on the Property. The Deed will reference the existence of the species and will contain restrictive provisions assuring that no actions can be taken which would adversely affect the species. The Transferee will be responsible for conducting any consultations and mitigations prior to beginning new construction in the habitats of these species.

# 6. PUBLIC COMMENTS

A public notice of the Draft Finding of Suitability for Early Transfer for this Property was published in the Plattsburgh Press-Republican on June 7<sup>th</sup>, 2010. A public comment period was held from June 7<sup>th</sup>, 2010 through July 6<sup>th</sup>, 2010; no comments were received.

# 7. REGULATORY COORDINATION

The NYSDEC and USEPA were notified of the initiation of the FOSET and SEBS on June 18<sup>th</sup>, 2009. Draft documents were provided on June 2<sup>nd</sup>, 2010 for their formal review and comment. The NYSDEC comments were provided on July 2<sup>nd</sup>, 2010 (Attachment 5A) and were incorporated or addressed (Attachment 6). Comments from the USEPA were solicited, but on August 2<sup>nd</sup>, 2010, the USEPA declined to comment (Attachment 5B) due to technical issues associated with the IRP Site FT002 Fire Training Area/IA Groundwater OU Proposed Plan and Record of Decision.

The Draft Final documents were provided on February 2<sup>nd</sup>, 2011. The USEPA provided comments, on March 15<sup>th</sup> 2011 (Attachment 5C); the USEPA comments were incorporated or addressed (Attachment 6). The NYSDEC indicated on March 4<sup>th</sup> 2011 that all previous concerns had been addressed and there were no additional comments (Attachment 5D). However, on April 28<sup>th</sup>, 2011, the NYSDEC indicated agreement with the USEPA comment regarding the FT002/IA Groundwater OU restriction (Attachment 5E).

The Air Force submitted Final Documents on June 3<sup>rd</sup>, 2011. The NYSDEC provided comment on June 16<sup>th</sup>, 2011 (Attachment 5E). The USEPA provided comments on June 16<sup>th</sup> and June 30<sup>th</sup>, 2011 (Attachments 5F and 5G). The Air Force has incorporated or addressed the NYSDEC and USEPA comments to the June 2011 documents (Attachment 6). The Air Force met with the NYSDEC and USEPA on several occasions from June 15<sup>th</sup>, 2011 through January 19<sup>th</sup>, 2012, and the Air Force, the USEPA and NYSDEC have now agreed to boundaries for soil vapor intrusion, groundwater, and non-residential use restrictions as described herein.

Revised documents were provided on 17 February 2012. The USEPA and NYSDEC provided comment on March 8<sup>th</sup>, and 19<sup>th</sup> 2012 (Attachments 5I and 5J). The Air Force has incorporated or addressed the USEPA and NYSDEC comments (Attachment 6).

# 8. FINDING OF SUITABILITY FOR EARLY TRANSFER

The proposal to transfer the Property has been adequately assessed and evaluated under CERCLA for: (a) the presence of hazardous substances and contamination on the Property; (b) environmental impacts anticipated from the intended use of the Property; and (c) the adequacy of use restrictions and notifications to ensure that the intended use is consistent with protection of human health and the environment. The anticipated 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 restrictions on use and disclosures as addressed above. The Property therefore is suitable for early transfer.

Additionally, the proposal to defer inclusion of the CERCLA 120(h)(3)(A)(ii)(I) covenant has been adequately assessed and evaluated to assure that, with respect to IRP Sites FT-002 Fire Training Area/IA Groundwater OU and SS-004 Soil OU: (a) the transfer will not delay CERCLA environmental response actions, (b) the anticipated reuse of the Property will not pose a risk to human health or the environment, and (c) the obligation of the Federal Government to perform all necessary response actions will not be affected by the early transfer of this Property. The Property, therefore, is suitable for early transfer. The covenant required by CERCLA §120(h)(3)(A)(ii)(I) will be deferred only with respect to the Site FT-002 Fire Training Area/IA Groundwater OU and SS-004 Soil OU. Pursuant to Section 120(h)(3)(A)(ii) of CERCLA, the United States warrants that any additional remedial action found to be necessary for the transferred Property after the date of the deed shall be conducted by the United States. A clause will be included in the deed granting the United States access to any portion of the Property in the event that CERCLA remedial action is necessary after transfer. When all response action necessary to protect human health and the environment has been taken, the transferee will receive a warranty pursuant to CERCLA 120(h)(3)(C)(iii) that satisfies the requirement of CERCLA 120(h)(3)(ii)(I).

<u>4/9/2012</u> Date

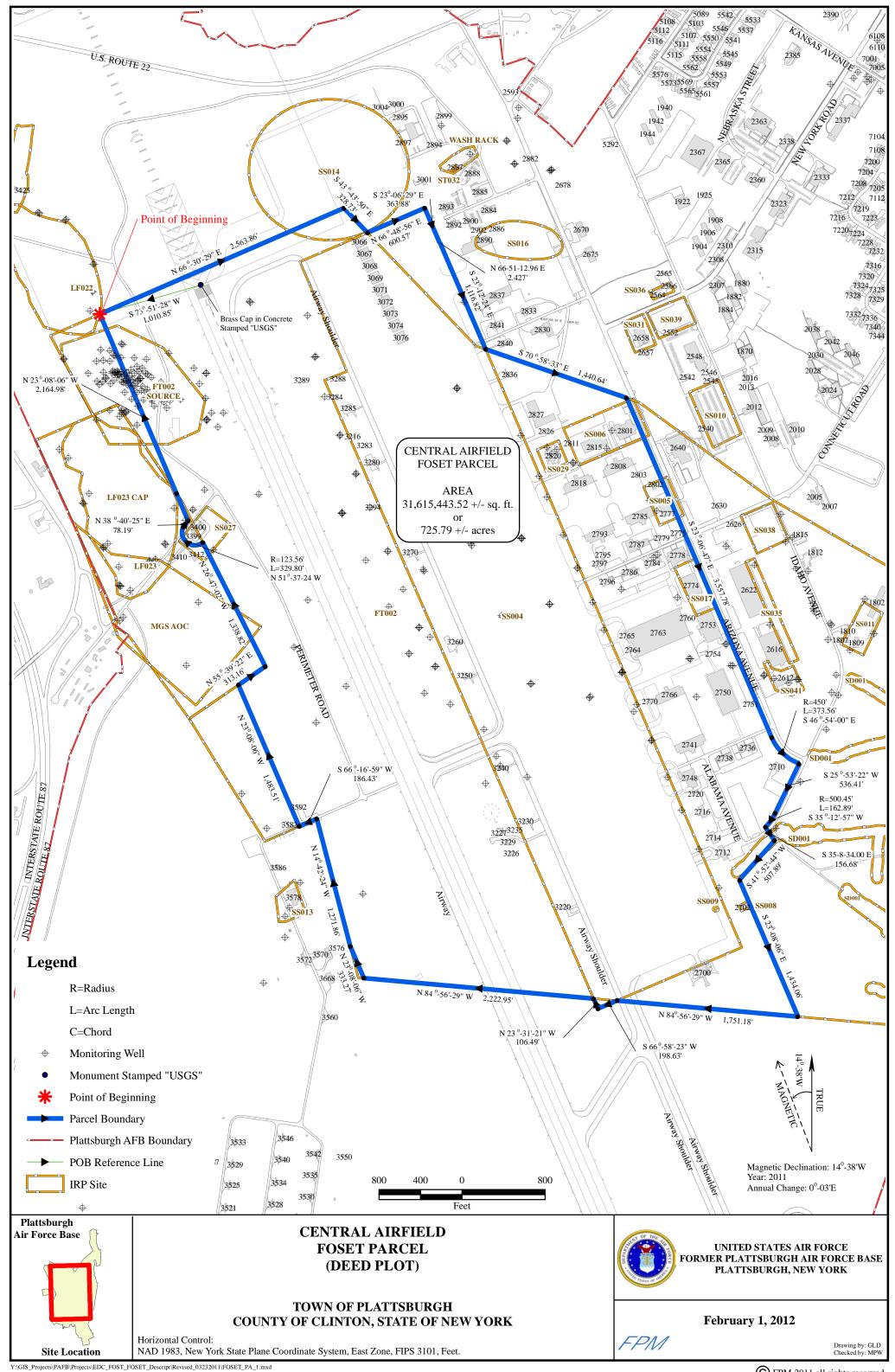
Robert M. Moore. Director Air Force Real Property Agency

Attachments:

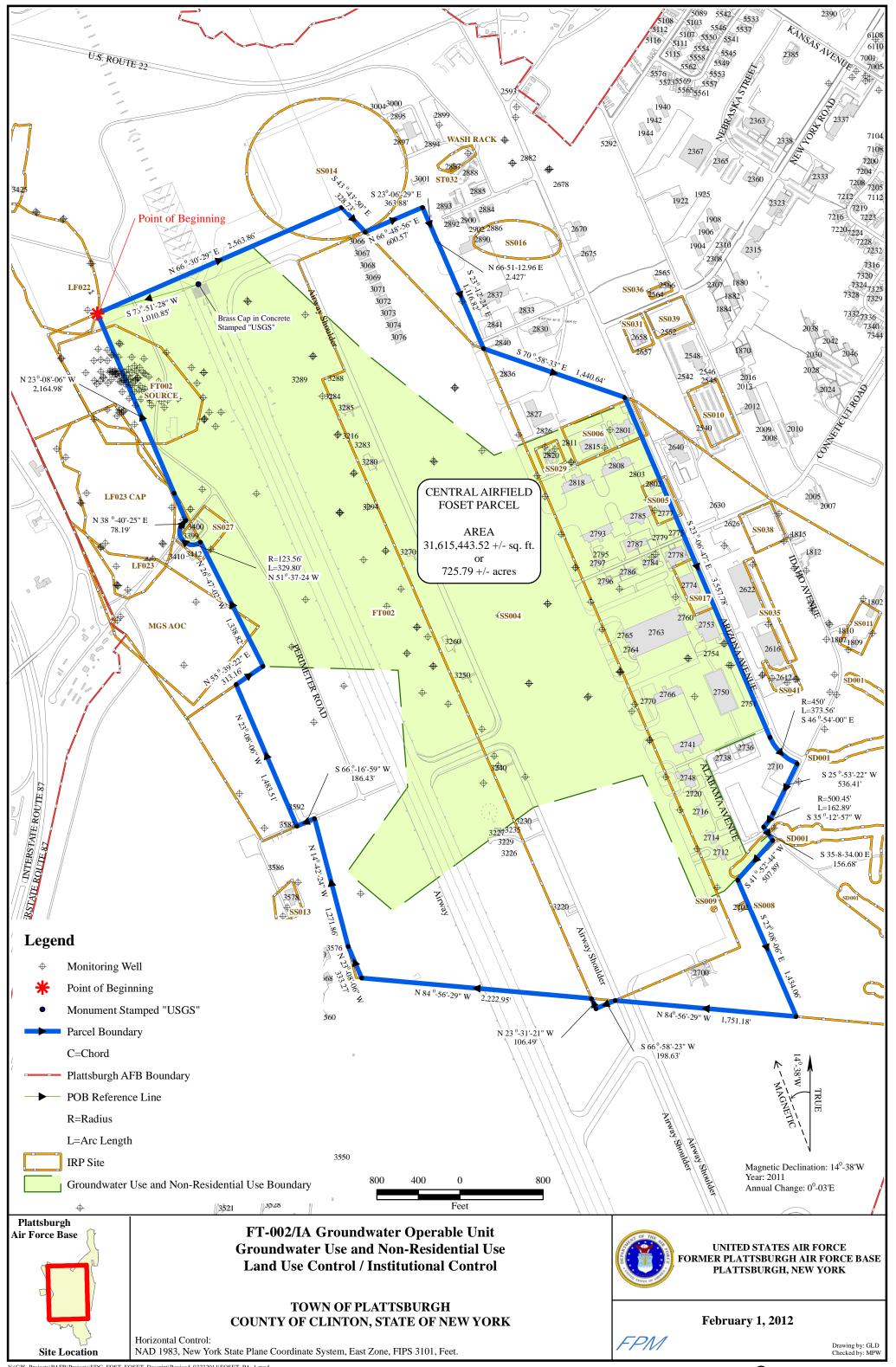
1A-D. Property Maps

- 1E-J. Land Use Controls/Institutional Controls
- 2. Environmental Factors Considered
- 3. Notice of Hazardous Substances Stored
- 4. Notice of Hazardous Substances Released
- 5A-J. Regulator Comments
- 6. Air Force Response to Regulator Comments

Central Airfield FOSET Atch 1A-1

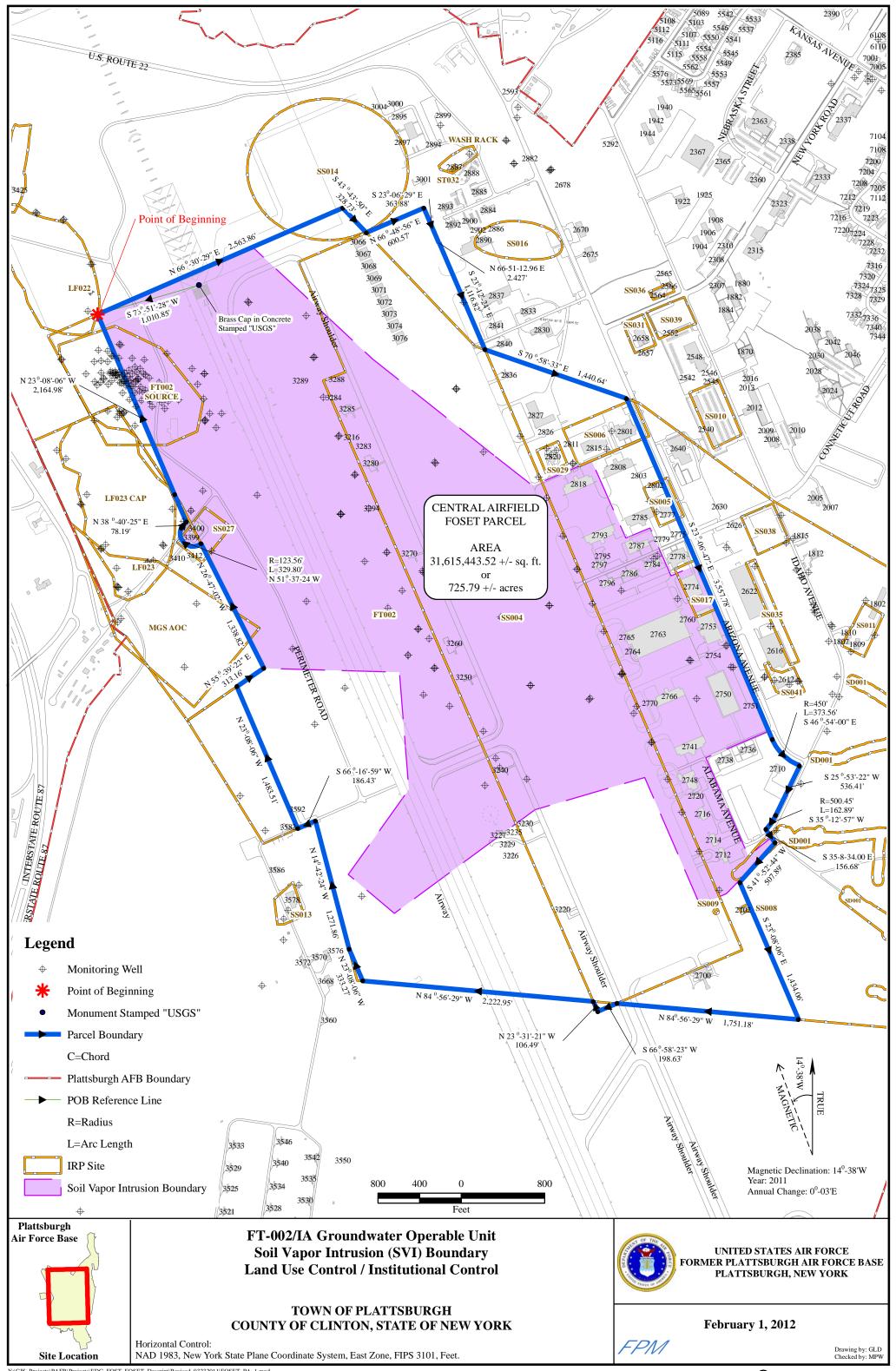


Central Airfield FOSET Atch 1A-2



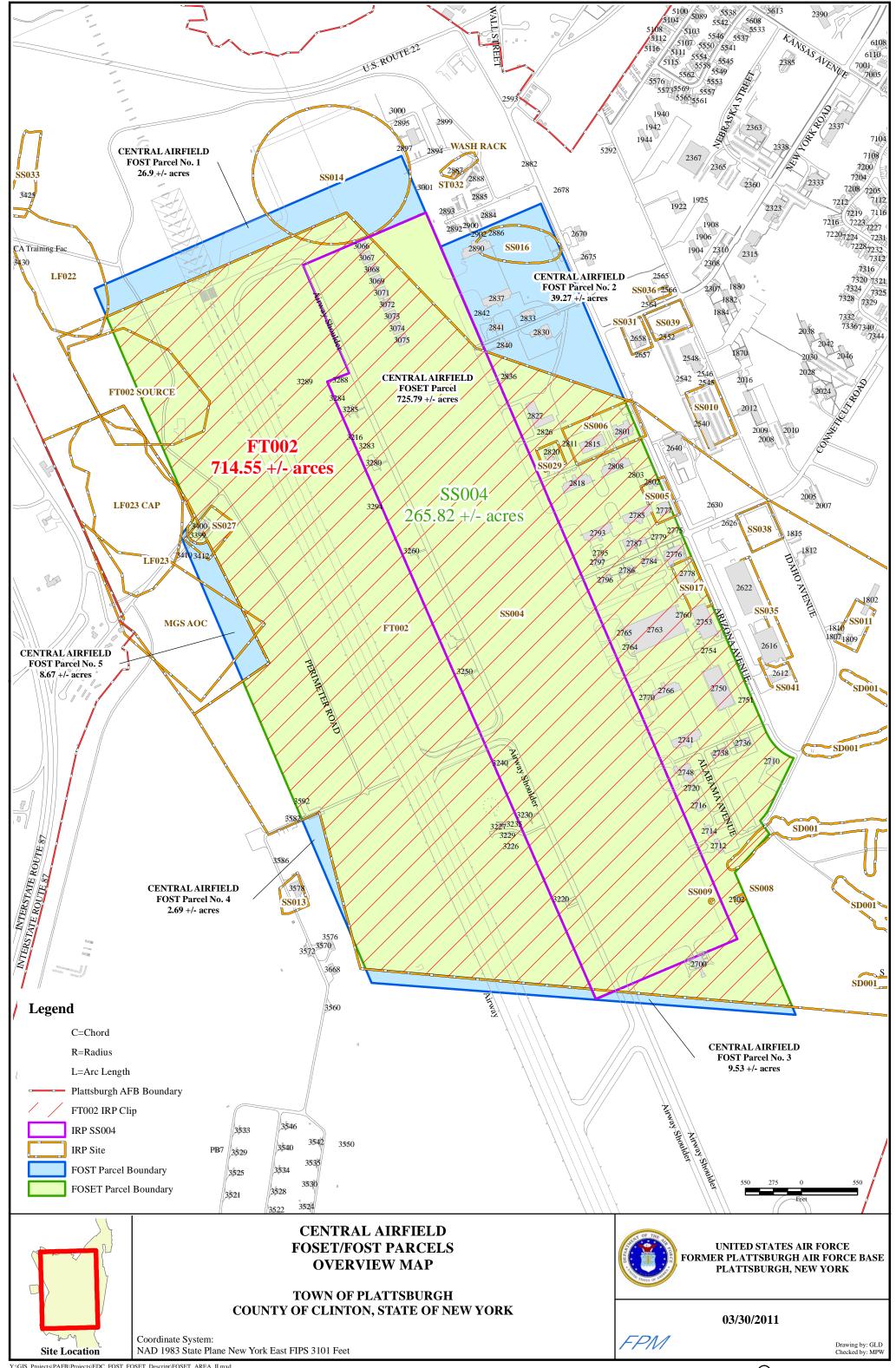
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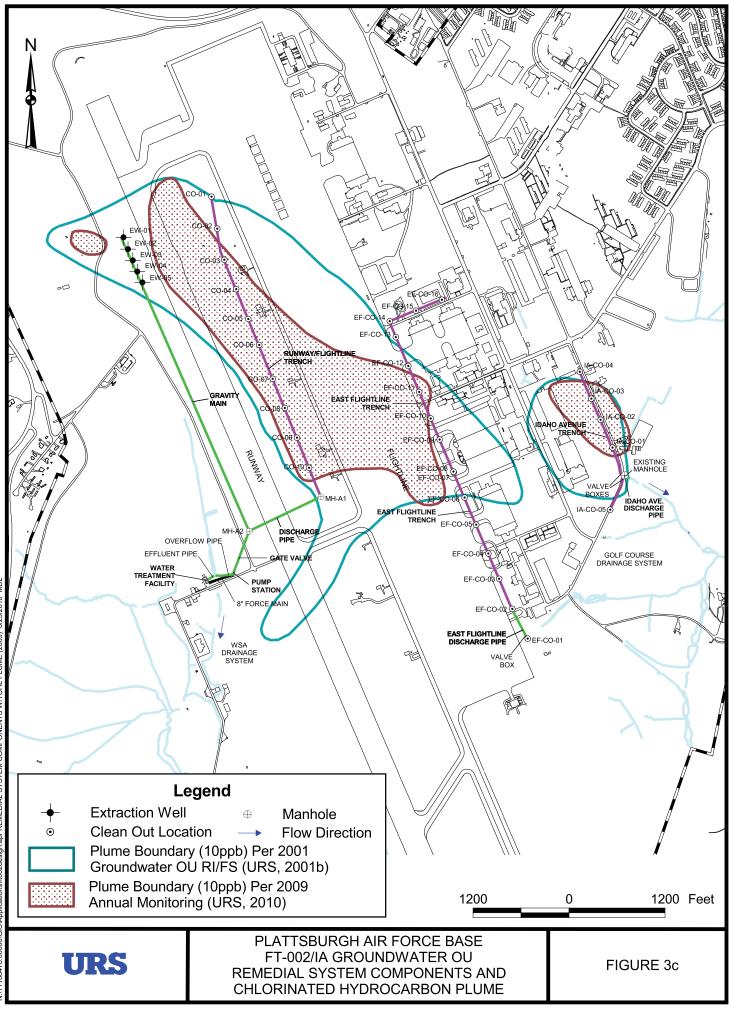


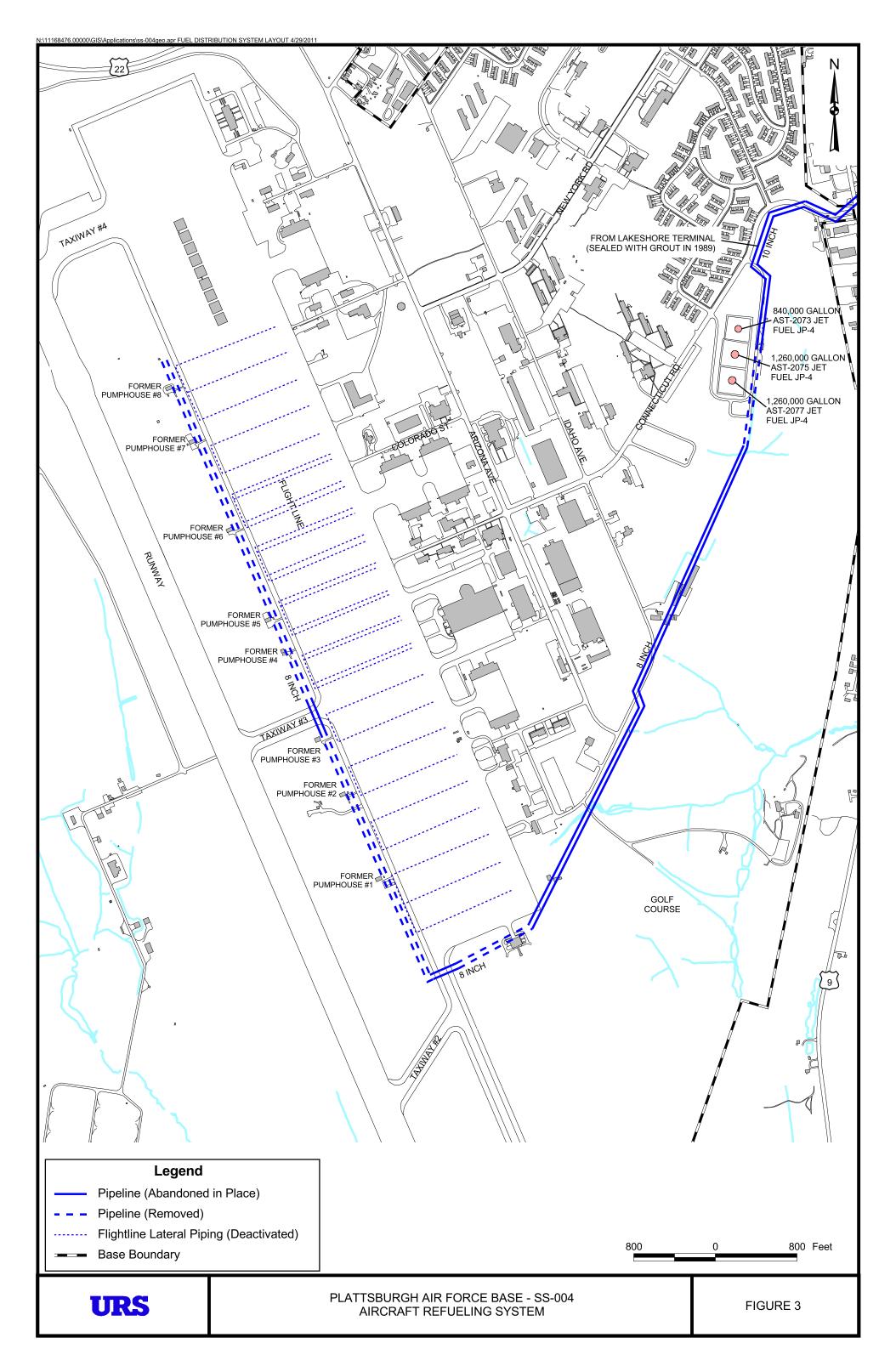
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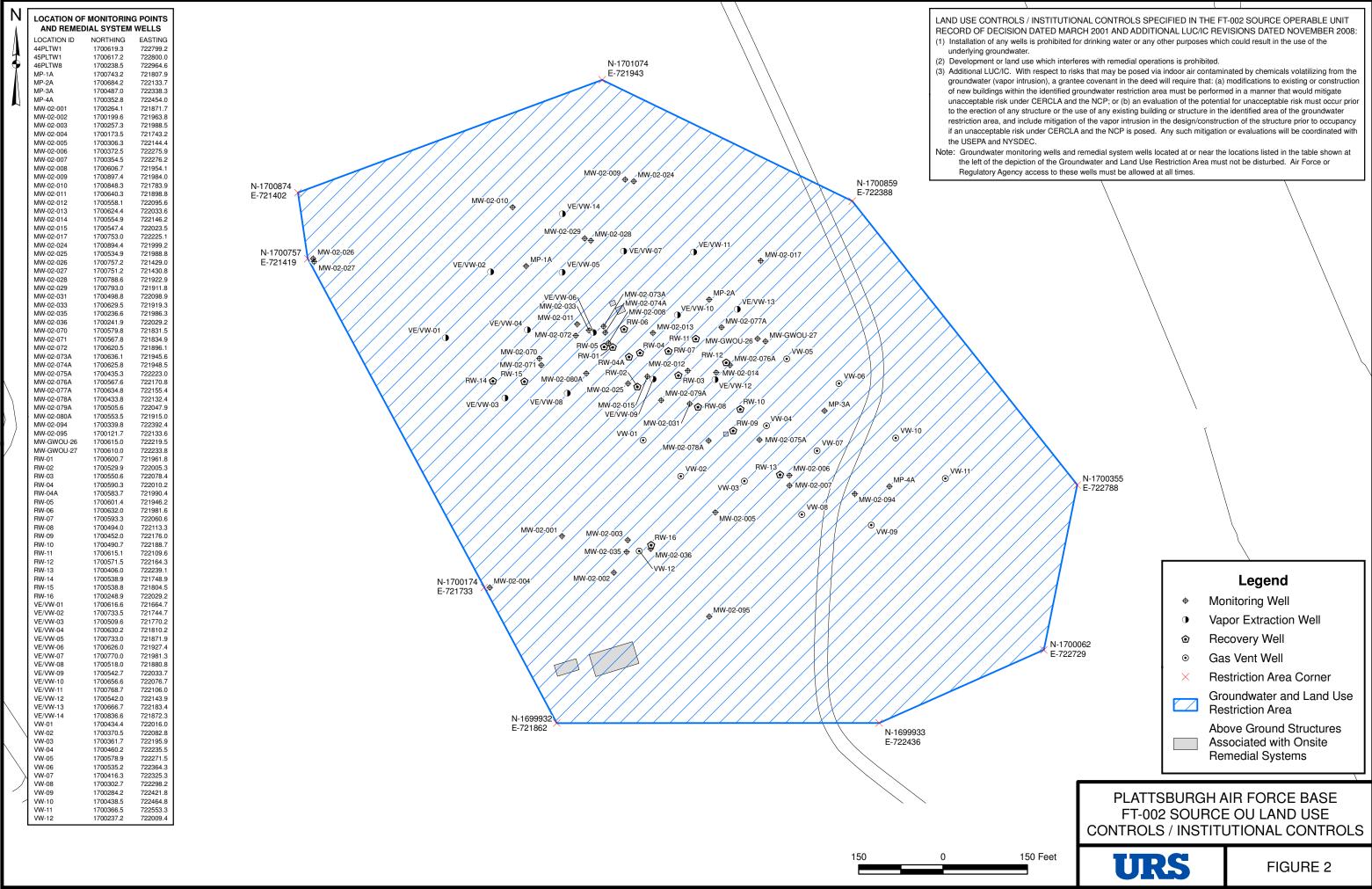
Central Airfield FOSET Atch 1B

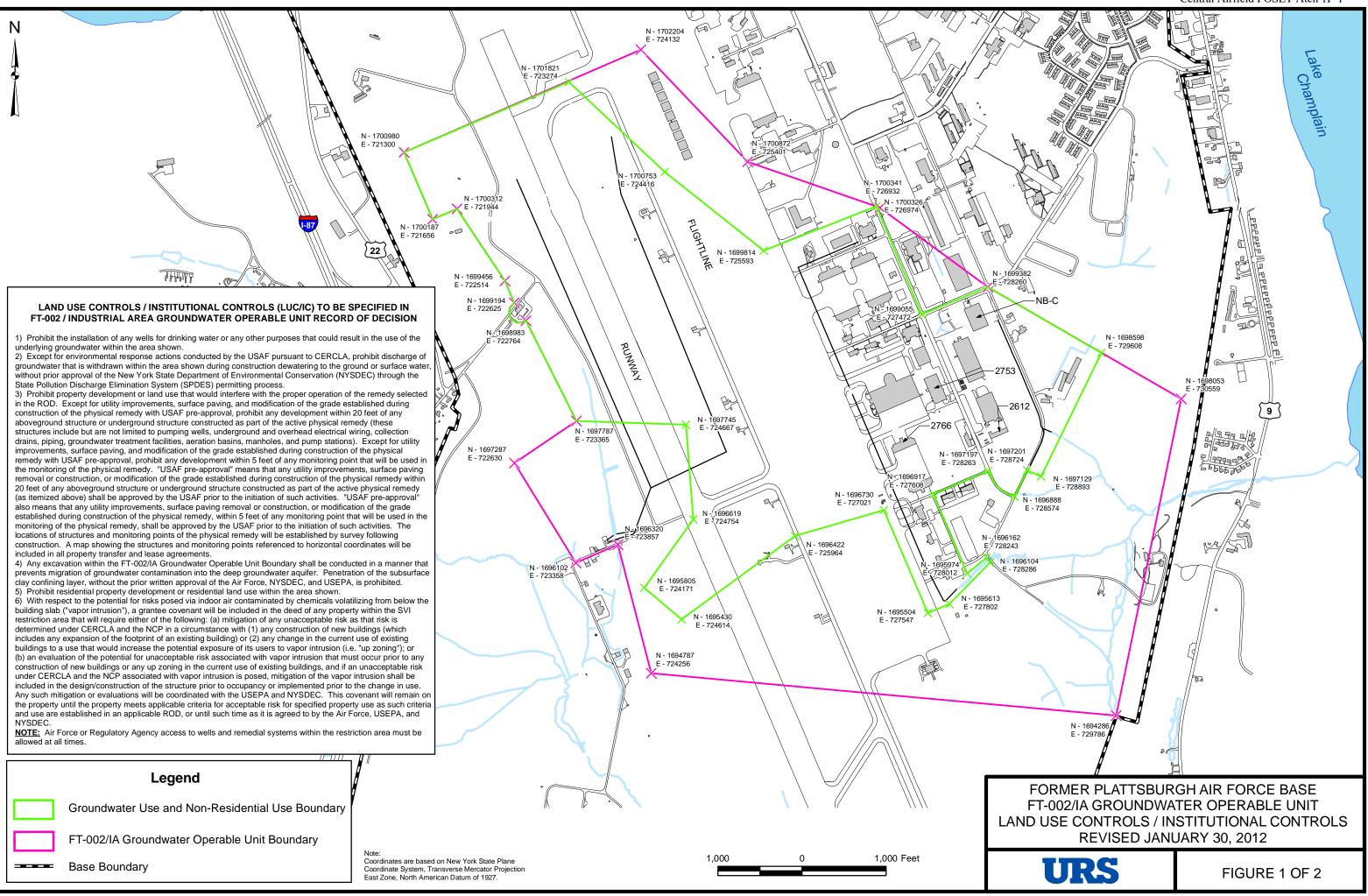


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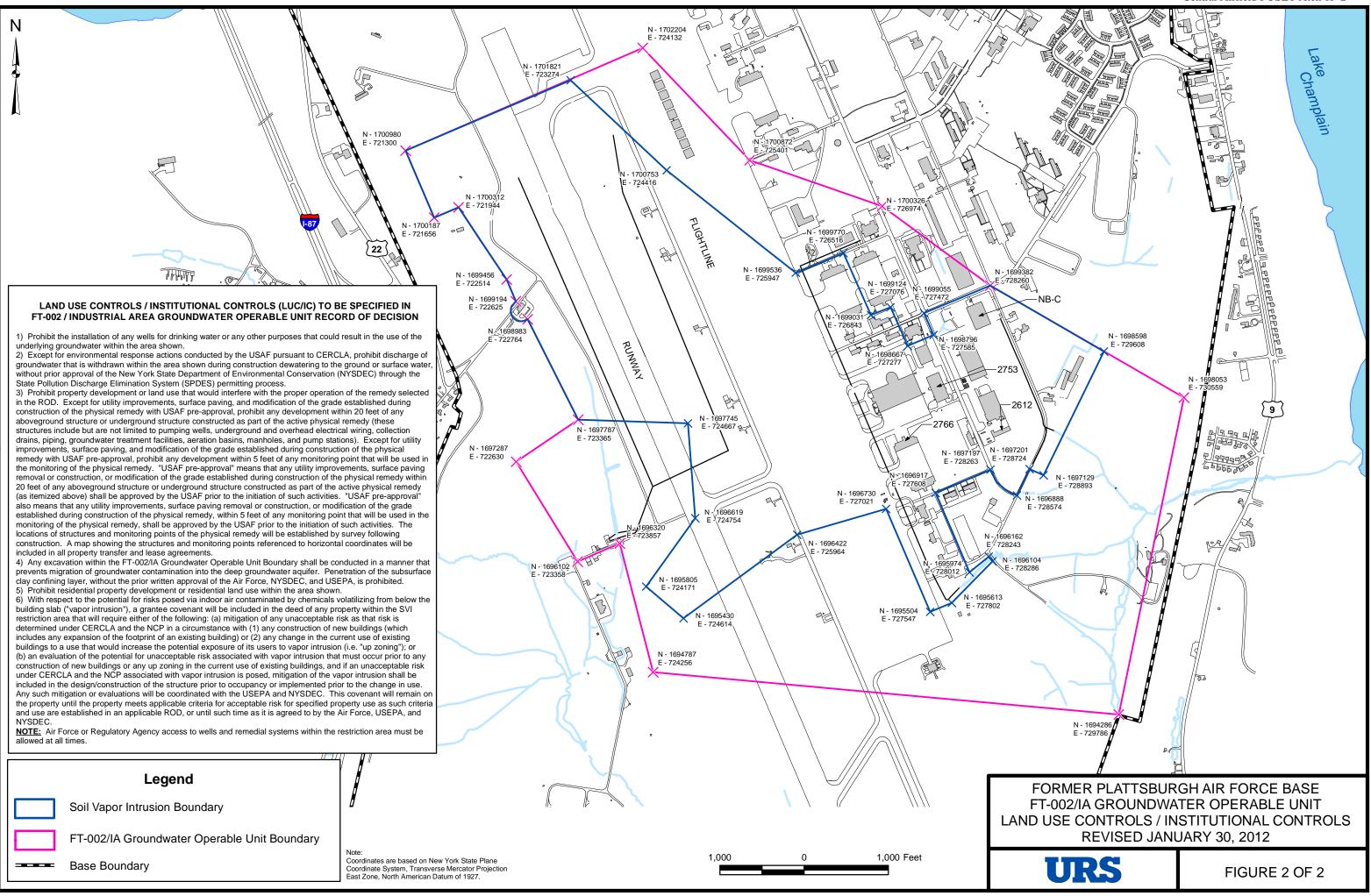






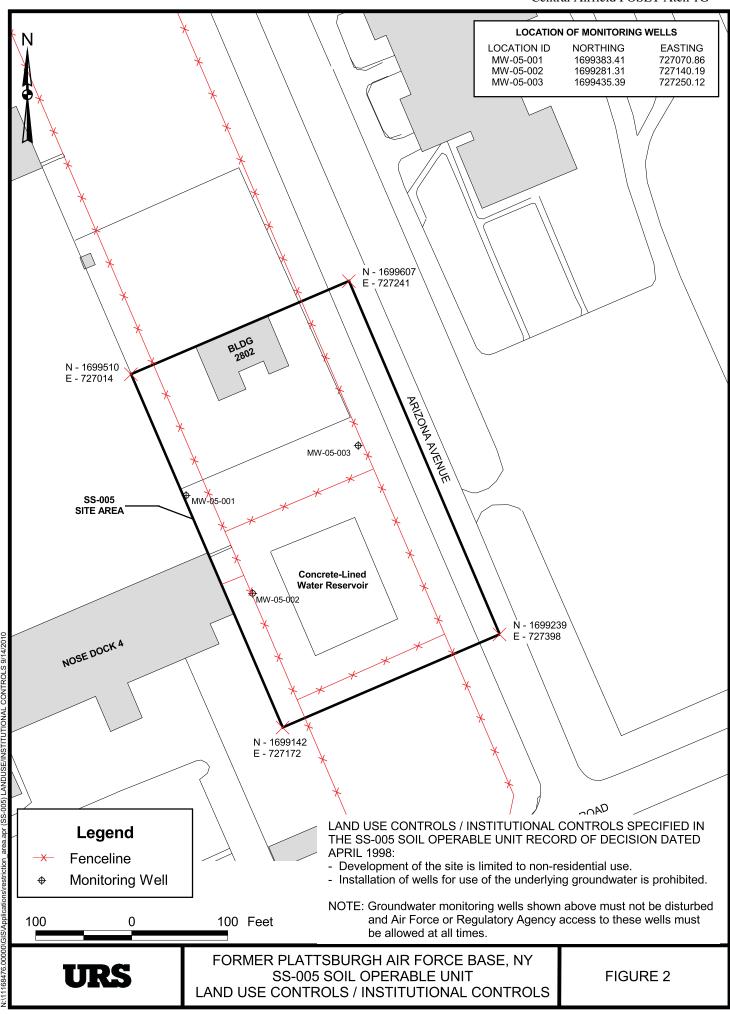


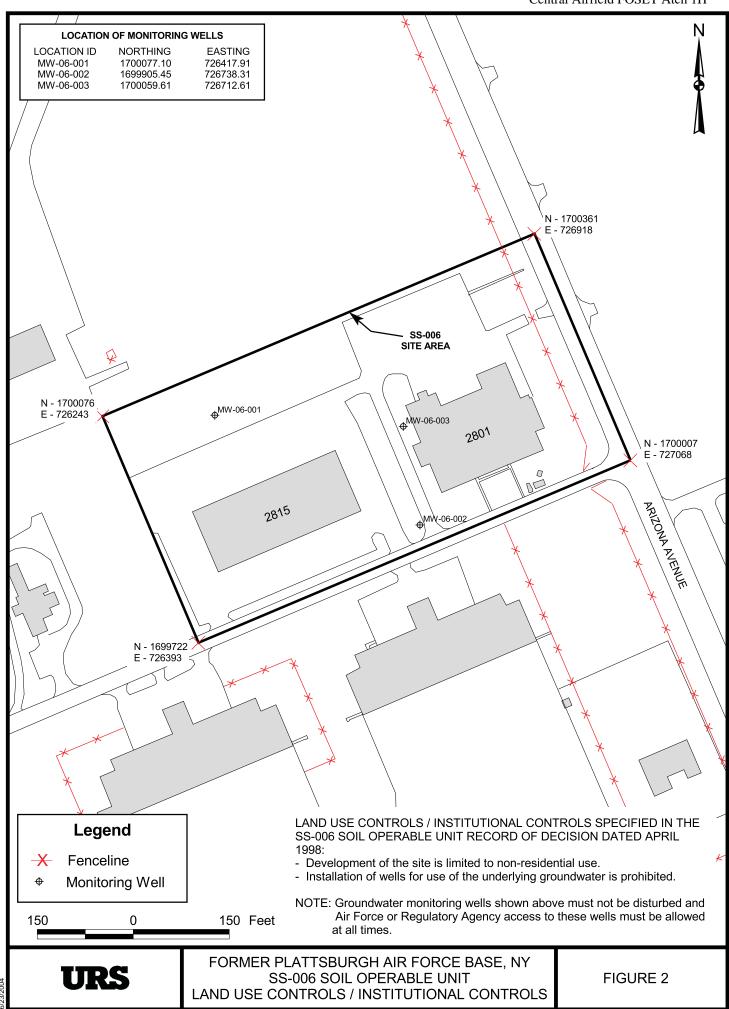
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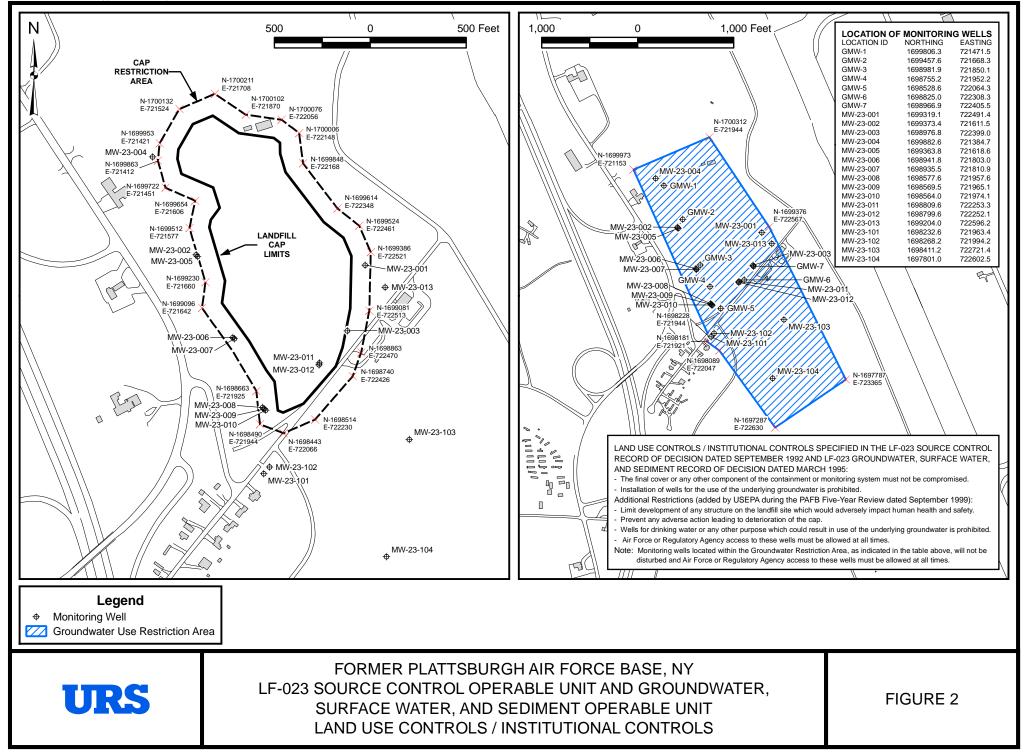
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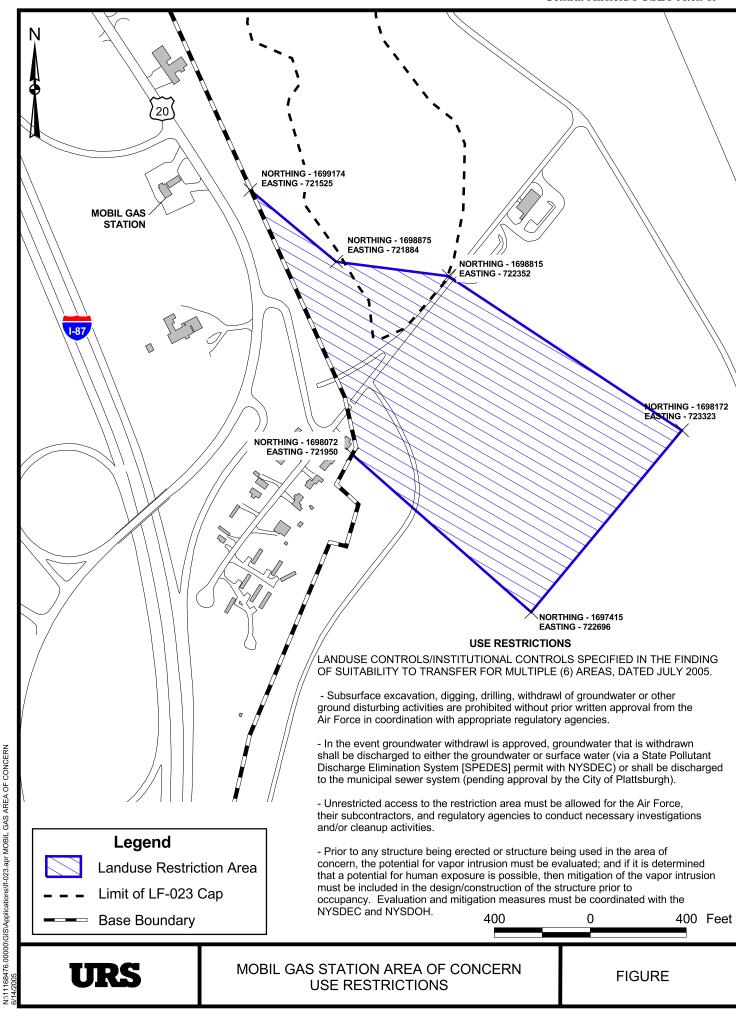
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Deed	Restriction or Required		Environmental Factors Considered
No	Ye	s	
	Notification	Deed Restriction	Environmental Restoration, Hazardous Substances, Petroleum
	Х		Hazardous Substances (Notification)
		Х	Environmental Restoration Program; (IRP, EC-CR, and AOC)
		Х	Petroleum Products and Derivatives
		Х	Storage Tanks (USTs/ASTs)
		Х	Oil/Water Separators (OWSs)
Х			Military Munitions (UXO), (DMM), (WMM), (MC)
	X		Radioactive & Mixed Wastes
	Х		Grease Traps
Х			Silver Recovery Units (SRUs)
			Disclosure Factors/Resources:
	Х		Asbestos Containing Material (ACM)
	X		Drinking Water Quality
	X		Indoor Air Quality
Х			Lead-Based Paint (Target Housing & Residential Property)
	X		Lead-Based Paint (Other than Target Housing & Res Property)
	X		Lead-Based Paint and LBP Containing Material and Debris
	Х		PCBs
			Other Factors:
		Х	Outdoor Air Quality/Air Conformity/Air Permits
Х			Energy (Utilities)
Х			Floodplains
	Х		Sanitary Sewer Systems
	Х		Septic Tanks
	Х		Solid Waste
			Biological Resources:
Х			Sensitive Habitat
	Х		Threatened and Endangered Species
	Х		Wetlands

# FOSET –Central Airfield Area

# **NOTICE OF HAZARDOUS SUBSTANCES STORED**

Notice is hereby given that the tables and information attached from the Basewide EBS contain a notice of hazardous substances that have been stored for one year at **Buildings 2710, 2714, 2715, 2741, 2748, 2753, 2754, 2759, 2760, 2763, 2774, 2775, 2785, 2793, 2801, 2802, 2808, 2815, 2818, 2820, 2827, 3270, and 3287,** and the dates that such storage 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, Compensation, and Liability Act (CERCLA or "Superfund") 42 U.S.C. Section 9620(h).

# **NOTES**

(1) Pages 2 through 5 are taken from pages 2 through 5 of Table C-1, Appendix C of the Basewide EBS, entitled "Hazardous Materials and Petroleum Storage."

(2) Pages 6 through 10 are taken from pages 5 through 9 of Table C-2, Appendix C, of the Basewide EBS, entitled "Hazardous Waste and Waste Petroleum Storage."

(3) Pages 11 through 24 are taken from pages 7 through 20 of Table C-3, Appendix C, of the Basewide EBS, entitled "Hazardous Materials Storage by Facility."

(4) Pages 25 through 27 are taken from pages 2 through 4 of Table C-4, Appendix C, of the Basewide EBS, entitled "Hazardous Waste Storage by Facility."

(5) Circled ID Numbers indicate locations applicable to this FOSET; lined-out ID Numbers indicate locations not applicable. The "New Cat" column has been pencil changed to reflect current status since publication of the Basewide EBS.

y 1997			77		
le C-1, Paga				Old Cat	New Cat
iD No.	Study	Description	Comments	Gm	COL COL
	12	Base supply and Equipment valencies tenning to degreaser, transformers, aircraft cleaning compounds, propylene and ethylene glycol, corrosion inhibitor, degreaser, transformers, aircraft cleaning compounds, and hydraulic fluids are stored in this building.	Some signs of surface steining were observed during the April 1994 visual site inspection. Base personnel report that this is only a temporary storage area for transformers until they can be turned into CRMO.		
	12		No signs of contamination were observed during the April 1994 visual site inspection.		<u>स्ट्रिक्</u> याह
	12	Base Engineer Covered Storage Facility (Outside in Yard). Storage of old and new transformers, soma marked "Non PCB," some not marked. Many unmarked 55-gallon drums.	Possible contamination identified during the April 1994 visual site inspection. IRP Site SS-038, PA performed in (1992; No Partier Action recommended The materials observed in the April 1994 VSI have been removed		
-2741	20	Large Maintenance Dock (Building 2741). Hazardous materials stored at this facility include paint strippers, thinners, paints, and mathyl ethyl katone. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No signs of contamination were observed during the April 1994 visual site inspection.	2	
A-2748	20	Fire Station Maintenance (Building 2748). Hazardous materials stored at this facility include Mogas, paint autopers, thinners, lubricants, hydrautic fluid, paints, sulfuric acid, muriatic acid, denatured alcohol, propens, and smoke oil.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
A-2753-1	19	General Purpose Alrcraft Maintenance Building Pneudraulics Shop (Building 2753). This portion of the building is used for repairing aircraft hydraulic components. Hazardous materials used and stored at this facility include motor oil, hydraulic fluids, peint strippers, catibration fluids, and paints. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
W-2753-2	19	General Purpose Aircraft Maintenance Building Electro/Environmental Shop (Building 2753). This portion of the building is used for aircraft component maintenance. Hazardous materials used and stored in this portion of the fazility include tubricants, nickel cadmium batteries, naphtha, synthetic oil, trichloroethane, transducer fluid, lead acid batteries, paints, corrosion inhibitors, Z Flux, silicone fluid, TCE, zicohol, and 550 fluid. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No signs of contamination were observed during the April 1994 visual site inspections.	2	

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All Category 2s changed to Category 1 per revised DoD guidance.

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Table C-1, Page 3 of 5

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ID Blo	Study Area	Description		Old	New	-
STM-2753-3	19	General Purpose Aircraft Maintenance Building, Wheel and Tire Shop (Building 2753). This portion of the building is used to inspect and clean aircraft tires. Paint, paint atrippers and thinners, PD-680, Citri Kleen, methyl athyl ketone, Solvent 724, and isopropyl alcohol are stored in this facility. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy IBuilding 2774). All unused portions are then returned to the pharmacy.		Cat 2	Ca	
M-2763-1	19	Maintenance Hangar inspection Shop (Building 2763). This facility is used for inspection and maintenance of aircraft. Lubricante, deicer, hydraulic fluid, methyl ethyl ketone, corrosion inhibitor, penetone coolant, and desiccant are all stored in this area of the building.	No signs of contemination were observed during the April 1994 visual site inspections.	2		ŗ
M-2763-2	19	Meintenance Hangar 380 ARS Tool Center (Building 2763). Hezardous materials stored in this area of the building include petroleum, thinners, lubricants, miscellaneous solvents, synthetic oil, Citri Kleen, penetone, ethylene glycol, corrosion preventor, and paints.	No signs of contamination were observed during the April 1994 visual aite inspections.	2	>	,
M-2774		Hazardous Materials Pharmacy (Building 2774). This building is used as the Hazardous Materials Pharmecy. Its function is to store and dispense hazardous materials as needed. Unused portions of hazardous materials are also returned here to be redispensed or stored as waste.	No signs of contamination were observed during the April 1994 visual site inspections. At the time of inspection, only the maintenance squadron was "on line" with the pharmacy. It is projected that the entire base will be "on line" by June 1994.	2		<b>•</b> ].
A-2793		Small Alrcraft Maintenance Nose Dock 3 (Building 2793). This building is used for the routine maintenance, trauble shooting, and isolation of component functions of small aircraft. Hazardous materials stored and used in this facility include tubricents, Citri Kleen, hydraulic fluid, methyl ethyl tetone, synthetic oil, paints, and isopropyl alcohol. Small aircraft are washed at Building 2763 (see OTH-2763-4). After April 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No contamination was observed during the April 1994 visual site inspections.	2		<b>,</b>
4-2801-1		Weapons System Maintenance and Management Facility, MMS Tool Room (Building 2801). This building stores thinners, lubricants, Citri Kleen, trichlorotrifluoroethane, and paints. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No contamination was observed during the April 1994 visual site inspections.	2	ð	
1-2801-2		Weapons System Maintenance and Management Facility. Weapons Release Shop Hazardous Waste Storage Area (Building 2801). This portion of the facility stores painta, thinners, lubricants, PD-680, Citri Kleen, mathyl ethyl ketone, and corrosion inhibitors. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal emount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No contamination was observed during the April 1994 visual site	2		
4-2801-3	17	Wespons System Maintenance and Management Facility, PMEL Shop. This facility is used for the	No signs of contamination were observed during the April 1994 visual site inspections.	2	/	

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1, Page	Study	Description.	Comments	Old Cat	New Cat
02	Ares 18	Non-Destructive Inspection Lab Shop (Building 2802). This facility is used for the non-destructive x-ray inspection of aircraft parts. A Phase I records search indicated an exterior storage area where naw and spent products are stored outside Building 2802. Hazardous materials used and stored in this facility include 1, 1, 1-trichloroethane, daveloper, penetrant, remover, and 2-fixer. The trichloroethane is drained into a 1-gallon metal can and poured into a 55-gallon drum at the Corrosion Control Accumulation Site (see STW-2753). After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Phermacy (Building 2774). All unused portions are then returned to the pharmacy.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
08	18	Large Aircraft Maintenance Nose Dock 5 (Building 2808). Hazardous materials stored and used in this facility include lubricants, paint strippers, thinners, methyl ethyl ketone, purging fluid, paint, and superiode soap. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.		2	
15	17	Aircraft Support Equipment Shop and Storage Facility, AGE Shop (Building 2815). This building is used for the maintenance of Aerospace Ground Equipment (AGE). Solvent 140 is used to clean parts. The two tanks (30- and 10-gellon) are changed cut every 6 months. All fuels are either returned to the fuel tanks. Historically, the fuels were burned at the fire training pit. Hazardous materials stored and used in this facility include engine oils, JP-4, carbon remover, PD-680, antifreeze, Citri Kleen, aircraft scap, hydraulic fluid, methyl ethyl ketone, synthetic oil, lead acid batteries, and miscellaneous materials. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazerdous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
	18	Fuel Systems Maintenance Nose Dock 6 (Building 2818). This facility is used for repairing fuel leaks and replacing fuel components. Hazardous materials used and stored in this facility include thinners, tubricants, miscellaneous solvents, methyl entryl ketone, patroleum, penetrant, isopropynol, ammonia hydroxide, denatured alcohol, JP-4 Bower, dye liquid, and paints. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No signs of conternination were observed during the April 1994 visual site inspections.	2	
20	17	Let Engine Test Cell (Building 2820). This facility operates and tests jet engines. Citri Kleen and oil mixtures are used during the cleanup process. Hydraulic engine fluids containing benzene are used during hydraulic testing. Other hazardous materials used and stored at this facility include paint strippers, lubricants, paints, and engine oil. Test-cell cooling water produced during operations is permitted for discharge. This facility in o longer operational.	No signs of contermination were observed during the April 1994 visual site inspections.	2	
127	17	Base Engineer Pavement and Grounds Facility, Snow Bern (Building 2827). This building is used for the equipment required to repair roads, sidewalks, runways, recreational areas, and to maintain lawns. Antifreeze, hydraulic fluid, and motor oil are stored here and used to "top off" the needed levels in the machinery. PD-680 stored in a 15-gallon tank is used to clean the parts. The shop has three storage lockers containing gas cans, spray cans, and starting fluid.	Staining observed inside on concrete throughout the building. The investigation of this area is in progress as part of Project 98-5001; ECD December 1998 Complete	7	

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ID No.	Study Area	Description	Commenta	Old Cat	Net
TM-2837	16	Large Aircraft Maintenance Nose Dock 7 (Building 2837). Hazardous materials stored and used in this facility include paints, paint strippers, paint thinners, Citri Kleen, and denatured alcohol. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No contamination was observed during the April 1994 visual site inspections.	2	
	15	Demineralized Water Storage. Hazardous materials stored here include caustic soda and muriatic acid. Both are used for water treatment.	No signs of contamination were observed during the April 1994 visual site inspection.		F
M-2890	16	Large Aircraft Maintenance Nose Dock 8 Structural Repair (Building 2890). This portion of the building is used for painting and stripping of aircraft and non-aircraft parts. Hazardous materials used and stored in this facility include paints, paint strippers, thinners, lubricants, methyl ethyl ketone, and miscellaneous solvents. Two wash areas (see OTH-2890) are also present at this facility.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
116600-	28	Missile Assembly Shop (Building 3578). This is an exterior storage area for new and spent products including solvents and paint-related wastes. It is located on the east side of the building on a concrete pad. The storage area is not covered or contained. After February 1994, all stored materials are considered "bench stock," and are only kept on hand for a minimal amount of time designated by the Hazardous Materials Pharmacy (Building 2774). All unused portions are then returned to the pharmacy.	No signs of contamination were observed during the April 1994 visual site inspections.		

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ID No.	Study Area	Description	Comments	Cid Cat	New Cet
	13	Heating Facility Building Satellite Accumulation Point (Building 2658). This facility is responsible for providing heat to Plattsburgh AFL. Hazardous wastes generated here are transferred to the accumulation point located at Building 2656. Hazardous wastes include No. 6 fuel oil and the residues from cleaning and spills.	During the April 1994 site inspection, the inside of the building was fairly clean; however, the outside was heavily stained (see SPL-2658-1-26). IRP Gits SS-031, field investigation completed in Lemany 1995; some soft removed done September 1995; The 20,000-geton day tank (UST) has been removed done September 1995; The 20,000-geton day tank (UST) has been removed threastigation and removed of contaminated coll is in programs as part of Project 96-6009 Phase 2. Additional clearup pending relies of heat plant.		
TW-2710	20	Audio Visuel Center (Building 2710). Benchstock of photography chemicals are stored within a concrete bermed area in the storage room. Two double cartridges used in the silver recovery process are stored here. The cartridges, as well as exposed chemistry, are drummed and sent to DRMO.	During the April 1994 visual site inspections, the facility was observed to be in good condition with no signs of contamination.	2	2
TW-2714	20	ATCALS Satelite Accumulation Point (2714). This building is a metal portable building resting on gravel. Mercury batteries, hazardous waste solids, and compressed drums are stored in drums on pallets. All wastes are transferred to DRMO for proper disposal. It is the satellite accumulation point for hazardous wastes generated at Building 2714.	No signs of contamination were observed during the April 1994 visual site inspections.	· 2	-
TW-2716	20	Squadron Operations Life Support Satellite Accumulation Point (Building 2715). Hazardous wastes generated here are transferred to the accumulation point located at Building 2785.	No signs of contemination were observed during the April 1994 visual site inspections.	2	~
W-2748	20	Fira Station Maintenance Satellite Accumulation Point (Building 2748). Hazardous wastes generated here are transferred to the accumulation point located at Buildings 2656 and 486.	No signs of contamination were observed during the April 1994 visual alte inspections.	2	•
W-2753-1	19	General Purpose Aircraft Maintenance Building Pneudraulics Shop Satellite Accumulation Point (Building 2753). This portion of the building is used for repairing aircraft hydraulic components. Hazardous materials used and stored at this facility include motor oil, hydraulic fluids, paint strippers, celibration fluids, and points. Hazardous wastes are transferred to the accumulation point at facility STW-2763-2.	No signs of contamination were observed during the April 1994 visual site inspection.	2	-
W-2753-2	19	General Purpose Alrcraft Maintenance Building Electro/Environmental Shop Satellite Accumulation Point (Building 2753). This portion of the building is used for aircraft component maintenance. Hazardous wastes collected are transferred to the accumulation points located at Buildings 2774, 2763A, 2890, or 2815.	No signs of contamination were observed during the April 1994 visual site inspection.	2	/
TW-2753-3	19	General Purpose Aircraft Maintenance Building, Wheel and Tire Shop Satellite Accumulation Point (Building 2753). This portion of the building is used to inspect and clean aircraft tires. Paint, paint strippers and thinners, PD 680, Citri Klean, methyl ethyl ketone, Solvent 724, and isopropyl alcohol are used in this facility. Hazerdous wastes generated in the process are stored here.	No signs of contamination were observed during the April 1994 visual site inspection.	2	•
TW-2753-4	19	General Purpose Aircraft Maintenance Building, Matala Technology Shop Satellite Accumulation Point (Building 2753). Hezardous wastes generated during manufacture and repair of eircraft parts and support equipment are stored here. Wastes include hydreulic fluid, Citri Kleen, and PD-140.	No signs of contamination were observed during the April 1994 visual site inspection.	2	~
W-2753-5	19	General Purpose Aircraft Maintenance Building, Non-Powered AGE, Satellite Accumulation Point (Building 2753). This portion of the building is used to repair jet engine support equipment and jet engine trailers. Hazardous wastes generated from this process are stored here and accumulated at either Buildings 2763A, 2890, 2815, or 2974. Wastes include hydraulic fluid, Citri Kleen, and PD-140.	No signs of contamination were observed during the April 1994 visual site inspection.	2	-
W-2754	19	Base Hazardous Storage (Building 2754). This is a small structure located south of Building 2753 percess California Street.	No signs of contamination observed during the April 1994 site inspection.	2.	

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#### Central Airfield FOSET Atch 3 (Page 7 of 27)

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σÖ *.* . دب Table C-2, Page 6 of 10 OH New. Study Cat Cat Comments Description Area No signs of contamination were observed during the April 1994 visual site 2 STW-2759 19 Field Maintenance Facility Accumulation Point. This building is a preengineered, prefabricated steel storage area specifically designed for the storage of hazardous wastes. It is the accumulation point for inspection. oil, sulfuric acid, lead batteries, and electrolyte. Generated hazardous wastes are accumulated in 55gallon drums and smaller containers. The building was constructed in 1989 and has a maximum capacity of 570 gallons. This is an accumulation point for all hazardous waste generated in Building 2753 shops. This facility is located south of Building 2763. 2 Maintenance Hangar Accumulation Point (Buiking 2783). This building is a preengineered, pretabricated No signs of contamination observed during the April 1994 site inspection. 19 STW-2760 steel storage area specifically designed for the storage of hazardous wastes. It is the accumulation point for hazardous wastes collected from satellite accumulations at Buildings 2774. 2818. 2753. 2763, 2802, 2815, 2804, 2820, and 3578. Waster include carbon remover, hydraulic Iluid, PD-140, and Pen Air M-5571. This facility is located south of Building 2763. No signs of contamination were observed during the April 1994 visual site 2 Maintenance Hangar Inspection Shop Satellite Accumulation Point (Building 2763). This facility is used STW-2783-1 19 for inspection and maintenance of aircraft. Lubricants, delcer, PCB transformers, hydraulic fluid, methyl inspection. ethyl ketone, corrosion inhibitor, penetone coolant, and desiccant are all stored in this area of the building. Hazardous waste generated here is transferred to the accumulation point located at Buildings 2763A, 2890, 2815, or 2774. Wastes include carbon remover, hydraulic fluid, PD-140, and Pen Air M-5571. No signs of contamination were observed during the April 1994 visual site 2 Maintenance Hangar 380 ARS Tool Center Satellite Accumulation Point (Building 2763). Hazardous STW-2763-2 19 waste generated here is transferred to the accumulation point located at Building 2785. Wastes include inspection. carbon remover, hydraulic fluid, PD-140, and Pen Air M-5571. Maintenance Hangar, 310 and 380 ARS Satelitte Accumulation Points (Building 2763, Dock 1 and No signs of contamination were observed during the April 1994 visual site 2 STW-2763-3 19 Dock 2). The air refueling squadron tanker flight section is responsible for aircraft maintenance. inspection. Hazardous wastes generated here are transferred to accumulation points located at Buildings 2763A, 2890, 2815, or 2774. Wastes include carbon remover, hydraulic fluid, PD-140, and Pen Air M-5571. No signs of contamination were observed during the April 1994 visual site 2 Maintenance Hanger, Repair and Reclamation Shop Setellite Accumulation Point (Building 2763). This 19 STW-2763-4 portion of the hangar is used for repairing and servicing flight control systems. Hazardous wastes inspection. generated from this operation are stored here and then transferred to one of the accumulation points located at either Buildings 2763A, 2890, 2815, or 2774. Wastes include carbon remover, hydraulic fluid, PD-140, and Pen Atr M-5571. 2 Hazardous Materials Pharmacy Satellite Accumulation Point (Building 2774). This building is now used During the April 1994 visual site inspection, it was observed that hazardous STW-2774 19 wastes were stored in 55-gallon drums that had secondary containment and for the hezerdous materials phermacy. Hezerdous wastes are stored along the east well of the building were sitting on pallets. No signs of spillage or staining were observed. including paints, oils, solvents, and thinners. Historically, this facility was used for jet engine maint enance. No signs of contamination were observed during the April 1994 visual site Hazardous Wasm Accumulation Point (Building 2775). Four barrels designated for marcury bulbs, 2 19 STW-2775 aerosol cans, and corrosives are located on the east side of the shed. The shed is within the fenced inspections. area called 2775. 2776 is an electrical substation.

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ID No.	Study Area	Description	Comments	Old Cat	New
W-2785-1	18	Organization Maintenance Facility Accumulation Point (near Building 2785). This building is a preengineered, prefabricated steel storage area specifically designed for the storage of hazardous wastes. It is the accumulation point for hazardous waste generated at satellite accumulation points located at Buildings 2763 and 2785. It is an accumulation point for JP-4, spill residue, lithium betteries, aerosol cans, and crushed fluorescent light bulbs. Generated hazardous wastes are accumulated in 55- gailon drums and smaller containers. It was installed in 1989, and has a maximum capacity of 570 gallons.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
W-2785-2	19	Large Alrcraft Maintenance Dock 310 ARS Vehicle Section Satellite Accumulation Point (Building 2785). This building is used for vehicle maintenance (servicing oil, hydraulic fluids, and glycol carts), washing vehicles, and storage of tow trucks and deicing equipment. Hazardous waste generated at this facility include vehicle antifreeze, ethylene glycol, propylene glycol, petroksum, paint strippers, thinners, lubricants, Citri Kleen, naphtha, hydraulic fluid, methyl ethyl ketone, synthetic oil, motor oil, smoke oil, methyl alcchol, paints, and starter fluid. Hazardous weste generated hare is transferred to the accumulation point located near Building 2785.	No signs of contamination were observed during the April 1994 visual site inspection.	2	
W-2793	18	Small Alteraft Maintenance Nose Dock 3 (Building 2793). This building is used for the routine maintenance, trouble shooting, and isolation of component functions of the small aircraft. Waste jat fuels, hydraulic fluids, and oils are disposed of into bowsers.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
W-2801	17	Weapons System Maintenance and Managament Facility, PMEL Shop Satellite Accumulation Point (Building 2801). This facility is used for the calibration and alignment of test measurement equipment. Hazardous wastes generated from this location are transferred to accumulation points located at Buildings 2763A, 2890, 2815, or 2774.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
W-2802	18	Non-Destructive inspection Lab Shop Satellite Accumulation Point (Building 2802). This facility is used for the non-destructive x-ray inspection of aircraft parts. Approximately 120 gallons per year of waste and 200 gallons per year of developer are produced here. A Phase 1 recards search indicated an exterior storage area for new and spent products is located outside Building 2802. Products include dye penetrant fluid, emulsitier, PD-680 cleaning solvent, and engine oil. The storage area consists of drums placed near the building on wooden pellets. No covering or containment is provided. Other hazardous materials used and stored in this facility include 1,1,1-trichlaroethene, developer, penetrant, remover, and Z-fixer. The trichlaroethane is drained into a 1-gallon metal can and poured into a 55-gallon drum at the Corrosion Control Accumulation Site (see STW-2753). The fixer produced from x-ray darkroom procedures is disposed of through a silver recovery unit before discharging down the drain (see SRU-2802). The developer is disposed of down the drain. Hazerdous wastes generated here are transferred to the accumulation point located at Building 2890.	No signs of contamination were observed during the April 1994 visual site inspection.	2	
W-2815-1	17	Aerospace Ground Equipment (AGE) Facility Accumutation Point (near Building 2815). This building is a preangineered, prefabricated steel storage area specifically designed for the accumutation of hazardous wastes. It is the accumutation point for hazardous wastes generated at satellite accumutation points tocated at Buildings 2774, 2818, 2753, 2763, 2802, 2816, 2801, 2820, and 3578. It is the accumutation point for 140 solvent, (nonhazardous) mineral oil, antifreeze, hydrautic fluid, used regs. synthetic oil, Compound E CARSON, and EAK/mercury batteries. Generated hazardous wastes are accumutated in 55-gallon drums and smaller containers. Nonhazerdous wastes (hydrautic fluid and lubricating oil) are also accumutated at this site in two 350-gallon polyethylene containers. It was installed in 1989 and has a maximum capacity of 570 gallons.	No signs of contamination were observed during the April 1994 visual site inspections.	2	

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	Study	Description	Comments	Old Cat	Now Cat
ID No. STW-2815-2	17 17	Aircraft Support Equipment Shop and Storage Facility, AGE Shop Satellite Accumulation Point (Building 2815). This building is used for the maintenance of AGE. Solvent 140 is used to clean parts. The two tanks (30- and 10-gallon) are changed out every 6 months. All fuels are returned to the fuel tanks. Historically, the fuels were burned at the free training pit. Waste hydraulic fluid and mineral oil are placed in a 350-gallon plastic tank outside the building and disposed of by DRMO. Hazardous materials atored and used in this facility include engine oils, JP-4, carbon remover, PD-680, antifreeze, Citri Kleen, aircraft soap, hydraulic fluid, methyl ethyl kotone, synthetic oil, lead acid batteries, and miscellaneous materials. Hazardous wastes generated are transferred to accumulation points located at Buildings 2763A, 2890, 2815, or 2774.	No signs of contamination were observed during the April 1994 visual site	2	
STW-2818	18	Fuel Systems Maintenance Nose Dock 6 Satellite Accumutation Point (Building 2818). This facility is used for repairing fuel leaks and replacing fuel components. Residual JP-4 from the fuel systems is put into a bowser and drained by contract personnel. Small amounts of JP-4 and residual are disposed of in the hanger floor drain oil/water separator. Hazardous materials used and stored in this facility include thinners, lubricants, miscellaneous solvents, methyl othyl ketone, petroleum, penetrant, isopropynol, ammonie hydroxide, denatured alcohol, JP-4 Bower, dys liquid, and paints.	No signs of contamination were observed during the April 1994 visual site inspection.	2	
STW-2820	17	Jet Engine Test Cell Satellite Accumulation Point (Building 2820). This facility operates and tests let engines. Citri Kleen and oil mixtures are used during the cleanup process. Hydraulic engine fluids containing benzene are used during hydraulic testing. Hazardous wastes generated ware transferred to accumulation points located at Buildings 2763A, 2850, 2815, or 2774. This facility is no longer operational. It was shut down in July/August 1993.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
STW-2827	17	Base Engineer Pavement and Grounds Facility, Snow Barn Satellite Accumulation Point (Building 2827). This building is used for the equipment required to repair roads, sidewalks, runways, recreational areas, and to maintain lawns. Antifreeze, hydrautic fluid, and motor oil are stored here and used to "top off" the needed lavels in the machinery. Waste from the drip pans is taken to the motor pool's 350-gallon plastic tank. A 15-gallon tank containing PD-680 is used to clean the parts. Vehicles are washed inside with aircraft soap and the rinse water drains into the floor's oil/water separator (see OWS-2827). Hazardous wastes generated from this area are transferred to the eccumulation point located at Building 2658.	Staining was observed inside on concrete throughout the building. The truesdystom of this ansa is in progress as part of Project 68-5001. ECD: December 1998	7	
STW-2830	17	Security Police Headquarters (Building 2830). One flammable locker, located in the gun cleaning room, contains solvents used for the cleaning of lirearms. Used rags with solvent are being stored in a 55- gallon drum until testing is completed, which will determine if they need to be disposed of as hazardous wastes through DRMO. A metal convex shed located south of the building stores paints and gasoline.	No signs of contamination were observed during the April 1994 visual site inspections.	2	
	16	Preventive Maintenance Satellite Accumulation Point. This area is located approximately 100 yards south of Building 2833 at the northwest corner of Arizona Avenue and Delaware Street. This is an exterior uncovered storage area for spent products including degreeser fluid, contaminated JP.4, flammable liquids, and waste flammable solids. The flammable figuids and flammable solids are contained in a secondary containment poly over pack drum. It is the satellite point for hazardous waste generated from fuels management.	During the April 1994 visual site inspection, it was observed that all 55-galion drums were located on wooden pallets. Some staining on the ground near the degreaser barrel was present. If a spill were to cocur, all liquids would flow into the curbed area. All drums and cans were properly labeled. The flammable Equids were stored in a poly over pack.		
	15	Alert Area Accumulation Point (Closest building is 2887). This building is a preengineered, prefabricated steel storage area specifically designed for the storage of hazardous wastes. Asbestos generated from inhouse remediation efforts is stored here.	No signs of contamination were observed during the April 1994 visual site inspections.		

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ID No.	Study Area	Description		Old	Net
	15	Description	Comments	Cat	
		Demineralized Water Storage, Water Systems Satellite Accumulation Point (Bullding 2888). Hazardous wastas are generated from the cleaning of the water tank and are transferred to the accumulation point located at Buildings 2656 or 492.	No signs of contamination were observed during the April 1994 visual site inspections.	-	F
	15	Base Engineer Maintenance Shop, Zone 2, Satellite Accumulation Point (Building 2893). This area was responsible for facility maintenance. Hazardous wastes generated here are transferred to the accumulation point located at Buildings 2656 or 492. Hazardous wastes generated include sodium vepor builts and lead acid batteries. This facility is now used for fuels maintenance, wastewater, and plumbing.	During the April 1994 visual site inspection, this area showed no signs of contamination.	-	
	16	Corrosion Control Shop Hazardous Waste Accumulation Point (near Building 2890). This is the accumulation point for hazardous waste generated from satellite accumulation points located at Buildings 2774, 2818, 2753, 2763, 2890, 2802, 2815, 2801, 2820, and 3578. It is the accumulation point for MEKs (peints), lacquer paint, polyurathane, epoxy primer, aliphatic poly thinner, nephtha, primer, strippers, alcohol, TCE, adhesive, sealant, Bondo, resin, and preseating compounds. Generated westes are accumulated in 55-gation drums and smaller containers. The building was constructed in 1989 and has a maximum capacity of 570 gations.	No signs of contamination were observed during the April 1994 visual site inspections.		
	18	Large Alrcraft Maintenance Nose Dock 8 Structural Repair Satellite Accumulation Point (near Building 2890). This preengineered, prefabricated steel storage building was specifically designed for the storage of hazardous wastes. This portion of the building is used for painting and stripping of aircraft and non- aircraft parts. Hazardous wastes generated are transferred to accumulation points located at Buildings 2763A, 2890, 2815, or 2774.	No signs of contamination were observed during the April 1994 visual site inspections.		
•3270	21	Base Engineer Maintenance Facility, Liquid Fuels Maintenance Shop Satellite Accumulation Point (Building 3270). This shop is in control of maintenance of permanently installed refueling systems Hazardous wastes generated here are transferred to the accumulation points located at Buildings 2658 and 492. Hazardous waste generated includes JP-4 filters. Building 3270 used to be an operational pumphouse with seven USTs. Building 3270 no longer contains or supports USTs.	No signs of contamination were observed during the April 1994 visual site inspections.	2	ð
-3287	21	Liquid Fuels Meintenance Satellite Accumulation Point Hydrants (Building 3287). This accumulation	During the April 1994 visual site inspection, no surface signs of spills or steins were present.	2	7
	30		This facility is in the process of being turned into a satellite accumulation point depending on test results from rags that are used for cleaning guns with Break Free. Statuting observed inside, "old dumpster," White no contentistion was observed in other mass, soil sampling will be done. The dumpster is to be wasted down before disposal, ECD: December 1999.		

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FacBty ID	Workplace Storage Area	Product	N3N .	Year	Product Quantity Stored	Product (1b)	Product (kg)	Constituent	Constituent	Constituent Mass (kg)	Reportable Quantity (kg)	GABRN	Bynonym(s)	٦
	Family Housing Maintenance Shop	Natural Wood Dough		1986	N5			N5	-	-		-		
	Family Housing Maintenance Shop	DAP 33 Glazing	-	1986	NS			NS					• •	1
1	Femily Housing Meintenance Shop	Peint, House, White, No. 3600		1980	NS			NS					• ••	-
	Family Housing Maintenance Shop	Primer, Metal, No. 6229	••	1986	NS		-	NS					-	_
-	Family Housing Maintenance Shop	Enamel, Floor, Bettleship Gray		1980	NS			N5			-		·	-   ·
	Family Housing Maintenance Shop	Liquid Seeler		1986	NS	-		N5					**	-
-	Family Housing Maintenance Shop	Paint, Latex, No. P-32-8	-	1988	N5	-		NS	-				• ••	1
	Family Housing Maintenance Shop	Paint, House, White, No. 4800		1986	NS			NS	-					-
-	Femily Housing Maintenance Shop	Palish, Furniture	7930-00-266-7121	1986	NS	-		NS					••	-
-	Family Housing Maintenance Shop	Paint, Architectural White, No. 12822		1988	NS		-	NS	-	-			-	1
	Family Housing Maintenance Shop	Varnish, Spred Spar		1985	NS		-	N5						1
	Family Housing Maintenance Shop	Paint, House, White, No. 3867	-	1986	N5			NS				•••	-	1
	Family Housing Maintenance Shop	Peint, No. 27778		1986	NS	'	-	NS .						1
2802	Non-Destructive Inspection Shop	1033 Group VII Fluorescent Fault Finder Daveloper	8860-00-782-2740	1986	144 oz	9	4. 1	Ketone Vapora	NS		-		`	
	Non-Destructive Inspection Shop	1033 Group VII Fluorescent Fault Finder Developer	8850-00-782-2740	1984	144 oz	9	4.1	Ketone Vepore	NS			••	-	
	Non-Destructive Inspection Shop	1, 1, 1-Trichlorosthane	8310-00-684-0387	1993	60 gal	417.3	189.3	1,1,1-Trichioro- ethene	100	189.3	464	79-00-6	Ethane, 1,1,1-trichloro-; Mathyl Chloroform	1
	Non-Destructive Inspection Shop	1, 1, 1-Trichloroathane	6810-00-684-0387	1992	50 get	417.3	189.3	1, 1, 1-Trichloro- ethana	100	189.3	454	78-00-6		1
	Non-Destructive Inspectien Shop	1,1,1.Trichloroethane	6810-00-664-0387	1989	100 gal	834.6	378,6	1, 1, 1-Trichlaro- sthane	100	378.6	454	79-00-5		
	Non-Destructive Inspection Shop	1, 1, 1-Trichloroethane	8810-00-664-0387	1986	48 gsi	401	181.7	1, 1, 1-Trichioro- sthene	100	181.7	454	79-00-6		٦c
	Non-Destructive Inspection Shop	1, 1, 1-Trichloroethane	6810-00-664-0387	1984	NS	-	••	1, 1, 1-Trichloro- othens	100		464	78-00-6		
	Non-Destructive Inspection Shop	1,1,1-Trichloroethane	8810-00-864-0387	1984	48 ge!	400.6	181.7	1, 1, I-Trichloro- ethane	100	181.7	46.4	79-00-5	Ethane; 1, 1, 1-trichloro; Mathyl Chloroform	14

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Facility	Workplace	Product	NSN	Yaar	Product Quentity Stored	Product (Ib)	Product (kg)	Constituent	Cansiituent (%)	Constituent Mass (kg)	Reportable Quantity {kg}	CASRN	Bynonym(e)
1D 2802	Storage Area Non-Destructive	1, 1, I-Trichlorosthane	6810-00-664-0387	1963	NS	-		1,1,1-Trichlaro- athana	100		464	78-00-5	Ethans, 1,1,1-trichloro-, Methyl 5 Chloroform
2802	Inspection Shop Non-Destructive Inspection Shop	1,1,1-Trichlorosthene	8810-00-684-0387	1982	NS	<b></b>		1,1,1-Trichloro- ethane	100		454	79-00-6	Ethane, 1,1,1-trichloro-, Methyl Chloroform
2802	Non-Destructive	1,1,1-Trichtorosthene	8810-00-884-0387	1979	NS			1, 1, 1-Trichlero- athene	100		454	78-00-6	Ethane, 1, 1, 1-trichloro-, Msthyl Chloroferm
2802	Non-Destructive	t, 1, 1-Trichloroethans	6810-00-884-0387	1978	NS			1,1,1-Trichloro- athena	· 100		454	79-00-5	Ethane, 1,1,1-trichloro-, Methyl Chloroform
2802	Non-Destructive	1,1,1-Trichlorosthene	6810-00-684-0387	1977	38 gal	300.4	138.3	1, 1, 1-Trichloro- ethans	100	136.3	464	79-00-6	Ethans, 1,1,1-trichloro-, Msthyl Chloroform
2802	Non-Destructive	1, 1, 1. Trichlorosthane	6810-00-664-0387	1978	38 gal	300.4	.138.3	1, 1, 1-Trichloro- sthene	. 100	.136.3	. 464	78-00-6	Ethane, 1, 1, 1-trichloro-, Mathyl Chloroform
2802	Non-Destructive	2-Propenel	6810-00-227-0410	1984	3 gal	25.0	11.4	Isopropyl Alcohol	100	11.4	NL	87-63-0	Isopropenol; 2-Propenol; Propyl Alcohol; Dimethylcerbinol
2802	Non-Destructive	Absorbent Material	7930-00-289-1272	1989	2 50.5 lb bags	101	46.8	Calcium Aluminum Silicete	100	46.8	NL		-
2802	Non-Destructive	Adhesive	8040-01-015-4187	1989 .	1 cen	0.6	0.2	Acstens	26	0.05	2,270	67-64-1	Dimethyl Ketone; Methyl Ketone; 2-Propanane
	Inspection Shop	[			(8-cz es)			Toluene	5	0.01	464	108-88-3	
				.				Petroleum Napthe	36	0.07		8030-30-8	
2802	Non-Destructive	Adhesive	8040-01-015-4187	1980	· 2 cans (8-oz ca)	1	0.5	Acetone Toluene	25 5	0.1 0.03	2,270 464	87-84-1 108-88-3	
	inspection on op							Petroleum Naptha	36	0.Z		8030-30-8	Mathylbanzene; Tokuol Banzin; Gael Ter Naptha; Petroleum Distillates (Naptha); Petroleum Spirit, V.M. and P. Neptha
2802	Non-Destructive	Adhesive	8040-00-282-8010	1986	1 qt	2.1	0.9	Solvente Nitrile Rubber	NS NS				a.
2802	Non-Destructive	Adhesive	8040-00-282-8010	1984	1 qt	2.1	0.9	Solvents Nitrile Rubber	NS NS			 	
2802	Non-Destructive Inspection Shop	Alcohol O-C-265 (Isopropyl Alcohol)	8810-00-227-0410	1986	2 gel	16.7	7.8	Isapropyl Alcohol	100	7.6	NL	87-83-0	Isopropenol; 2-Propenol; sec-Propyl Alcohol; Dimethylcarbinol
2802	Non-Destructive Inspection Shop	Alcohol O.C-285 (Isopropy) Alcohol)	8810-00-227-0410	1983	1 gat	8,4	3.8	Izopropyi Alcohol	100	3.8	NL	67-63-0	Isopropenol; 2-Propenol; sec-Propyl Alcohol; Dimethylcerbinol
2802	Non-Destructive	Aluminum Paint	8010-00-884-7488	1989	1 q1	2.8	1,3	Totuci	22	0.3	464	108-88-3	Toluens; Methylbenzene
	Inspection Shop							Lactol Spirita Mineral Spirits	19 24	0.2 0.3		64476-85-0	Petroleum Spirits; Stoddard Solvent; V.M. and P. Naptha

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Facility ID 2802	Workplace Storage Aree Non-Destructive	Product	NSN	Year	Product Quantity Stored	Product (fb)	Product (kg)	Constituent	Constituent	Constituent Mass (kg)	Reportable Quantity (kg)	CASRN	Bynonym(e)
2002	Inspection Shop	Cléáner, Goneral Purpose	7930-00-387-7388	1989	88 oz	6.6	2.5	Ethylens Glycol Monobutyl Ether	6	0.1	NL	111-76-2	2-Butoxyethanol; Butyl Cellosolvo; o-Butyl Ethylene
				1.		-		Tetresodium Ethyl- enediaminatetra- acatate	1	0.03	NL		Glyco] 
								Surfactant Sodium Carbonate, Anhydrous	1	0,03 0.03	<u> </u>		
2802	Non-Destructive Inspection Shop	Cleaner/Remover SKC- NF/ZC7B	8860-00-782-2740	1984	288 cans (13-oz es)	234	108.1	Mothyl Chlorotorm	NS		454	71-56-8	Ethans; 1; 1, 1-Trichloro-; ÷ 1, 1, 1-Trichloroethans; Msthyltrichloromethans; Chlorothans NU; Chlorothans- NU
2802	Non-Destructive Inspection Shop	Cleaning Compound, Optical	8840-00-392-9751	1993	1 can	1	0.46	Ethyl Alcohol	19	0.09	NL	84-17-5	Absolute Ethenol; Ethenol; Grain
					!			Methyl Alcohol	1	0.005	2.270	67-56-1	Mathenol; Wood Alcohol:
								Detergent Weter	0.16 79	0.0007 0.4	NL NL	=	Columbian Spirita
2802	Non-Destructive	Cleaning Compound, Optical	8840-00-392-9761	1992	1 can	1	0,46	Ethyl Alcohol	19	0.09	NL	64-17-5	Absolute Ethenol; Ethenol; Grein
						ļ		Mathyl Alcohol	1	0.005	2,270		Alcohol Mathenol; Wood Alcohol:
								Detorgent Water	0,16 70	0.0007 0.4	NL NL	7732-18-5	Columbian Spirite *-
2802	Non-Destructive	Cleaning Compound, Optical	6840-00-392-9761	1989	ð oz	0.38	0.17	Ethyl Alcohol	19	0.03	NL	84-17-6	Absolute Ethanol; Ethanol; Grain
								Methyl Alcohol	1	0.00Z	2,270		Alcohol - Mathenol; Wood Alcohol:
								Detergent Water · ·	0.16 79	0.0003 0.1	NL NL		Columbian Spirite
2602	Non-Destructive	Classing Compound, Optical	6840-00-382-9751	1986	4 bottles (2-oz es)	0.6	0.2	Ethyl Alcohol	19	0.04	NL	84-17-5	Absolute Ethanol; Ethanol; Grain
								Methyl Alcohol	1	0.00Z	2,270		Alcohol Mathanol; Wood Alcohol;
								Detergent Water	0.15 79	0.0003	NL	 7732-18-5	Columbian Spirite
	Non-Destructive Inspection Shop	Cleaning Compound, Optical	6860-00-392-9761	1984	48 bottles' (2-oz ea)	6	2.7	Ethyl Alcohol	19	0.6	NL		Absolute Ethenol; Ethanol; Grain
		ľ	ļ	[				Methy Alcohol	1	0.03	2,270		Alcohol Methanol; Wood Alcohol: Woort
								Detergent Water	0.16 79	0.004	NL NL		Nepthe, Columbian Spirits

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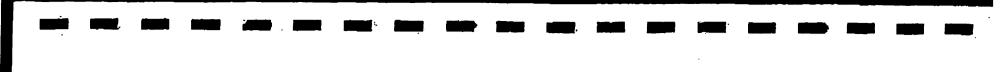
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Fecility	Workplace	Product	NSN	Year	Product Quantity Stored	Product (Ib)	Product (kg)	Constituent	Constituent	Constituent Mass (kg)	Reportable Quentity (kg)	CABRN	Synonym(s)
1D 2802	Storage Area Non-Destructive	Cleening Lubricant, Electrical	6850-00-003-6296	1993	1 can (12-oz ea)	0.75	0.3	1, 1, 2-Trichloro- 1, 2, 2-trifluoro-	97	0,3	NL	78-14-2	Freen 113; 1,2-Dichloro- 1,1,2-trifluaroethene
	Inspection Shop	2190111601						othano Dichlorodifluoro- methane	3.5		2,270	76-7 1-8	Methane, dichlorodifluoro-; Freen F-12
2802	Non-Destructive	Cleaning Lubricant, Electrical	6850-00-00-5285	1992	1 can (12-oz es)	0.75	0.3	1, 1, 2-Trichloro- 1, 2, 2-trifluoro-	97	0.3	NL	78-14-2	Freen 113; 1,2-Dichloro- 1,1,2-triftuerosthane
	Inspection Shop							ethene Dichlorodifluoro- methane	3.6		2,270	75-71-8	Methene, dichlorodithuoro-; Freen F-12
2802	Non-Destructive	Corrosion Preventative Compound	8030-01-041-1588	1986	1 cen (18-cz es)	1	0.45	NS		-	-	-	-
2802	Non-Destructive	Corrosion Preventative	8030-01-041-1598	1984	16 oz	1	0.5	NS					•• 
2802	Non-Destructive Inspection Shop	Couplant Ultragel II	6850-01-157-4340	1989	3 gal	25.0	11.34	Polymer Glycerol	NS NS		Ň	- 66-81-6	 Giycarinə; Giycarin; 1,2,3-Propanətrol
2802	Non-Destructive Inspection Shop	Developer D-701 NF	-	1984	9 lb	9	4.1	NS	-	-			-
2802	Non-Destructive Inspection Shop	Developer Replenisher	6750-00-165-7133	19 <b>93</b> -	150 gsi	1,251.8	667.9	Water Potessium Sulfite Hydroquinone	70 26 8	97.6 142.0 34.0	NL NL	7732-18-5 	- p-Benzenediol; Benzohydro- quinene; p-Dihydrobenzene;
	-							Potassium Hydroxide	5	28.4	454	1310-68-3	Tecquinol Caustic Potesh; Lyo; Potessium Hydrate
2802	Non-Destructive Inspection Shop	Developer Replenisher	8760-00-185-7133	1992	150 gal	1,251.8	567.B	Water Potassium Sulfite Hydroquinone	70 25 6	397.5 142.0 34.0	NL NL NL	7732-18-5 	 p-Benzenedici; Benzohydro- guinone; p-Dihydrobenzene; Teccuinol
								Potessium Hydroxide	5	28.4	464	1310-58-3	Caustic Potesh; Lys; Potessium Hydrate
· 2802	Non-Destructive	Davaloper, Replenisher	8750-00-186-7133	1989	8 kits	8	3.6 (1.2 kg	Part A: Potassium	,<6	<0.07	464	1310-68-3	Caustic Potesh; Lye; Potassium Hvdrate
							for aach of 3 perte)	Hydroxide Hydroquinone	< 10	< 0.14	NL	123-31-9	p-Banzenediol; Banzohydro- quinane; p-Dihydrobenzene;
								Water Pert B:	NS		NL	773185	
			'			1		Acetic Acid	77.6	0.9	2.270	64-19-7 7732-18-5	Ethanoic Acid; Glacial Acetic Acid; Vinagar Acid
								Water Pert C: Giuteraldehyde	22.6 38	0.3	NL NL		 1,5-Pentansdione
		4			_			Water	62	0.7	NL	773185	

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FaciDity ID	Workplage Storage Area	Product	NSN	Year	Product Quantity Stored	Product (Ib)	Product (kg)	Constituent	Constituent	Constituent Mass (kg)	Reportable Quantity [kg]	CASRN	Synonym(e)
2802	Non-Destructive	Developer, Replenisher	8760-00-186-7133	1986	380 gel	3,004.2	1,362.7	Water	70	963.9	NL	7732-18-6	
	Inspection Shop							Potessium Sutfite Hydroquinone	25 8	318.0 76.3	NL. NL	123-31-9	 p-Banzensdiol; Banzohydro- quinone; p-Dihydrobenzene;
								Patessium Hydroxide	5	63.6	464	1310-58-3	Tecquinel
2802	Non-Destructive Inspection Shop	Developer, Replanisher	6760-00-165-7133	1984	12 kits	12	6.4 (1.8 'kg for each of	Pert A: Potassium Hydroxida	<5	< 0.09	454	1310-58-3	Caustic Potash; Lyo; Potassium Hydrata
							3 parts)	Hydroquinone	< 10	< 0.18	NL	. 123-31-9	
								Weter Part B:	NS		NŁ	7732-18-6	~
								Acetic Acid	77.6	1.4	2,270	64-19-7	
j								Water Pert C:	22.B	0.4	NL	7732-18-5	Acid; Vineger Acid 
	•							Gluteraldshyds Water	38 62	0.7	NL NL	111-30-8 7732-18-6	1,5-Pentadione
2802	Non-Destructive Inspection Shop	Developer ZP-98	8850-00-782-2740	1986	12 cens 1300cc es)	D.18	0.07	Methyl Chloroform	62	0.04	454	71-66-8	Ethane; 1, 1, 1-trichlaro-; 1, 1, 1-Trichloroethane; Methyttrichloromethane; Chlorothane NU; Chlorothene NU
	<u></u>							Cerban Dioxide/ Chiarmethene Mixture	28	0.02	NL	124-38-9	
	Non-Destructive Inspection Shop	Emulaifier	8850-01-024-5772	1989	66 gai	459.0	208.2	Socium Petroleum Sulfate	80	168.6	NL		
								Ethoxylete Ethylene Glycol Mono Butyl Ether	10 5	20.8 10.4	NL NL		
	Non-Destructive Inspection Shop	Enamel, Blue	8010-00-598-5927	1988	1 gai	8.3	3.8	Minaral Spirita	45	1.7	NL	64475-85-0	
								Methyl Elhyl Ketone	<0.6	< 0.02		78-93-3	Solvent; V.M. and P. Naptha 2-Butenone; Ethyl Methy Katons Methyl Acetone; MEK
	Non-Destructive Inspection Shop	Ensmei, Gloss	8010-00-527-2045	1884	1 can (1·gel ea)	8.4	3.8	Load Chrometa	NS	-	Nons Assigned	7439-82-1	C.I. 77676
					;			Aikyd Resin Rule 68 Mineral Spirite	NS NS		NL.	 84475-85-0	 Petroleum Spirits; Stoddard Solvent; V.M. and P. Naptha
·								Leed Drives	NS		None Assigned	7439-92-1	C.I. 77576
								Cobalt Drives	NS		NL	740-48-4	C.I. 77320

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Fectility ID	Workplace Storage Aree	Product	NSN	Year	Product Quantity Stored	Product (Ib)	Product (kg)	Constituent	Constituent (96)	Constituent Mase (kg)	Reportable Quantity (kg)	CASRN	Synonym(a)
2802	Non-Destructive Inspection Shop	Enemel, Gloss, Gray	8010-00-862-8034	1986	0 cans {}3-oz es)	4.9	2.2	Mineral Spirits Isobutane Propana Methylene Chloride	25 29.3 29.3 8	0.8 0.8 0.8 0.2	NL NL 464	74-98-8 75-09-2	Solvent, V.M. and P. Naptha Diethyl; Methylethylmethane Dimethylmethane; Propyl Hydride Freen 30; Dichleromethane; DCN
				1				V.M. and P. Neptha	6.6	0.1	NRL		Mineral Splits; Petroleum Splits; Stoddard Salvent
2802	Non-Destructive	Enamel, Gloss, Green	8010-00-288-7727	1986	4 cans (1-gal ea)	33.4	16.1	Lead	NS		NRQA	7438-92-1	C.I. 77676
2802	Non-Destructive	Enamel, Gloss, Graen	8010-00-288-7727	1984	4 cans (1-gal ea)	33.4	16.1	Load	NS		NROA	7439-92-1	C.I. 77675
2802	Non-Destructive	Enamel, Gloss, Yellow	8010-00-527-2045	1986	6 cans (13-oz ca)	4.9	2.2	Lead Chromate Alkyd Resins	16.9 30,5	0.4 0.7	NRQA NL	7439-92-1	
	Induction on the							Rule 66 Mineral Spirite	39 <5	0.9	NI. NROA	64475-85-0 7439-92-1	Pstroleum Spirite; Stoddard Solvent; V.M. and P. Napthe
	•							Lead Dryer Cobalt Dryer	<6	0.1	NRQA	744-48-4	-
2802	Non-Destructive	Enamel, Gloss, White	8010-00-884-4781	1988	E cans (13-oz es)	4.9	2.2	Mineral Spirite	46	1.0	NL.	04475-85-0	Petroleum Spirite; Stoddard Solvent; V.M. and P. Naptha
	Inspection Shop							Methyl Ethyl Katone	< 6	0,1	2,270	78-93-3	2-Butenone; Ethyl Methyl Ketone; Methyl Acetone; MEK
2802	Non-Destructive	Enamel, Rad	8010-00-627-3198	1986	T gel	8.3	3.8	Mineral Spirita	45	1.7	NL	64475-85-0	Petroleum Spirits; Stoddard Solvent; V.M. and P. Nepthe
2802	Non-Destructive	Fixing Bath, Replanisher	6760-00-092-6054	1993	4 kita	1	0.45	Ammenium Thiosulfate	NS		NL	-	-
				•				Sodium Sulfate Acetic Acid	NS 1	 0.005	NL 2,270	. 64-19-7	 Ethanoic Acid; Glecial Acetic Acid; Vinegar Acid
					·			Borle Acid	1	0.005	NL		
2802	Non-Destructive	Fixing Bath, Replenisher	8760-00-092-5054	1992	4 kits	1	0,45	Ammonium Thiosulfate	N5		NL	-	
	and the second state							Sodium Suffete Acetic Acid	N5 1	0.005	NL 2,270		 Ethanoic Acld; Glacial Acetic Acid; Vineger Acid
		}						Boric Acid	1	0.005	NL		
2802	Non-Destructive	Floor Polish Remover	7930-00-045-8923	1989	2 gel	18.7	7.6	Sodium Mata- silicate	9	0.7	NL	-	**
	mapaction adop							Methanol	0.005	0.0004	2,270		Methyi Alcohot
2802	Non-Destructive Inspection Shop	Floor Wex	7930-00-141-6888	1989	6 gel	41.7	18.9	Weter Ammonia Acrylic Polymers Synthetic Parrefine	63 0.1 NS NS	16.7 0.02 	46.4 	7732-18-5 7864-41-7  	 Anhydrous Ammonia  
2802	Non-Destructive Inspection Shop	Floor Wax	7930-00-141-6888	1986	5 gat	41.7	18.9	Water Ammonia Acrylic Polymera	83 0.1 NS	16.7 0.02	45.4	7732-18-5 7884-41-7	 Anhydraus Ammonia

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FacBity (D	Workplace Storage Area	Product	NSN	Year	Product Quentity Stored	Product (Ib)	Product (kg)	Constituent	Constituent	Constituent Mass (kg)	Reportable Quantity (kg)	CASRN	Bynonymia)
2802	Non-Destructive Inspection Shop	Floor Wax, Water Emulsion	7930-00-141-5888	1984	5 gel	41,7	18.9	Water Ammonia Acrylic Polymers Synthatic Polyfins	NS NS NS NS		46.4 	7732-18-6 7684-41-7 	
2802	Non-Destructive Inspection Shop	Furniture Polish	7930-00-268-7121	1989	1 qt	2.1	1.0	Perrafin Oil	NS			8002-74-2	
2802	Non-Destructive Inspection Shop	isopropyl Alcohol	8810-00-227-0410	1993	1 qt	2.1	0.9	Isopropyl Alcohol	100	0.9	NL	87-63-0	Isopropanol; 2-Propanol; ssc- Propyl Alcohol; Dimethylcarbinol
2802	Non-Destructive Inspection Shop	Isopropyl Alcohol	6810-00-227-0410	1992	1 crt	2.1	0.9	Isopropyl Alcohol	100	0.9	NL	67-63-0	Isopropenol; 2-Propenol; sec- Propyl Alcohol; Dimethylographinol
2802	Non-Destructive Inspection Shop	isopropyi Alcohol	8810-00-227-0410	1989	1 gel	8.3	3.8	Isopropyl Alcohoł	100	3.8	NL	67-63-0	Isopropenol; 2-Propenol; sac- Propyl Alcohol; Dimethylcarbinol
2802	Non-Destructive Inspection Shop	isopropyl Alcohol	6810-00-227-0410	1986	3 gel	26.0	11.4	Isopropyl Alcahol	100	13.4	NL	67-63-0	Isopropenol; Dimethylcerbinol; 2-Propenol; Propyl Alcohol
2802	Non-Destructive Inspection Shop	Lecquer, Acrylic, Flat Black	8010-00-682-6382	1986	2 can# (13-oz ea)	1.6	0.7	Mothylens Chloride Toluene	40 12.2	0.3 0.1	454 464	76-09-2 108-88-3	Froon 30: Dichloromethene: DCM
	/							Butyl Cellosolve	3, \$	0.02	NL	111-76-2	2-Butoxyethanol; o-Butyl Ethylene Glycol; Ethylene Glycol Monobutyl Ether
2802	Non-Destructive Inspection Shop	Lecquer, Acrylic, Flat Black	8010-00-582-5382	1984	2 cans (13-oz ea)	1.8	0.7	Methylene Chloride Tcluene	40 12.2	0.3 0,1	464 464	75-09-2 108-88-3	Methens, dichloro- Benzens, methyl-; Methylbenzene; Tabiel
								Butyl Cellosolve	3.1	0.02	NL	111-78-2	2-Butoxysthanol; c-Butyl Ethylena Giycol; Ethylena Giycol Monobutyl Ether
2802	Non-Destructive	Lecquer, Black	8010-00-682-5382	1986	6 cane (13-oz ea)	4.9	2.2	Methylene Chloride Totuone	40 12,2	0.9 0.3	464 464	75-08-2 108-88-3	DCM; Dichloromethane; Freen 30 Bengens, methyl-; Methylbengene; Tokrol
			:					Butyl Cellosolve	3.1	0, 1	NL	111-78-2	Misinykosnizens; Tokrol 2-Butoxyethanol; o-Butyl Ethylane Glycol; Ethylane Glycol Monobutyl Ether
	Non-Destructive Inspection Shop	Lacquer, Clear	8010-00-515-2487	1986	6 cans (13-oz se)	4.9	2.2	Toluane Acetone	NS NS		454		Benzene, methyl-; Methylbenzene; Tchuol
						[		D. Rutud Apatoto	NS		2,270		Dimethyl Ketone; Methyl Ketone; Propanone; 2-Proganone
								n-Butyl Acetate Butyl Cellusolva	NS NS	-	NL NL		Acetic Acid n-Butyl Ester; Butyl Ethenosta 2-Butoxyethenol; o-Butyl
								Isobutene	NS		NL.		Ethylene Glycol; Ethylene Glycol Diathyl; Methylathylmethene

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есШту	Workplace		NSN	Yest	Product Quantity Stored	Product (B)	Product (kg)	Constituent	Constituent	Constituent Mass (kg)	Reportable Quantity (kg)	CASRN	Synonym(e)
1D 2802	Storage Area Non-Destructive	Product Lacquer, Gloss, Gray	8010-00-852-8034	1984	12 pts	12.8	6.7	Mineral Spirite	25	1.4	NL	64475-85-0	Petroleum Spirits; Stoddard Solvent: V.M. and P. Napthe
2002	Inspection Shop							lsabutane Propane	29.3 29.3	1.7 1.7	NL NL	108-87-8 74-88-8	Diethyl; Methylethylmethane
		•••						Methylone Chlorida V.M. and P. Naptha	8 5.5	0.5 0.3	464 NL	8447 <del>5</del> -86-0	BCM; Dickloromathans; Freon 3 Minerel Spirite; Petroloum Spirite; Stoddard Solvent
2802	Non-Destructive	Lacquer, Green	8010-00-141-2961	1986	8 cans	4.9	2.2	Tolusne	83	1.8	454	108-88-3	Benzene, methyl-; Methylbenzene; Toluol
	Inspection Shop				(13-oz sa)			Xylana (mixed) Ethylana Glycol Manobutyl Ether	13 <6	0.3 <0.1	4 <b>54</b> NL	1 330-20-7 1 1 1-78-2	m, o, and p-Benzene, dimethy
2602	Non-Destructive	Lacquer, Olive Dreb	8010-00-584-3149	1986	4 cens	3.26	1.6	Totuol	27	0.4	454	108-88-3	Toluene; Benzene, methyl-: Methylbenzene
LUUL	Inspection Shop				{13-oz es}			Xyici	24	0.4	464	1 330- 20-7	m, a, and p-Xylanes; m, a, and p-Benzenes, dimethyl-
2802	Non-Destructive	Lecquer, Olive Drab	8010-00-684-3149	1985	4 cans  13-oz ea}	3.26	1.6	Toluene	27	0.4	464	108-88-3	Methylbenzane; Tohiol
	Inspection Shop							Xylane (mixed)	24	0.4	454	1 3 3 0- 2 0- 7	m, o, and p-Xylenes; m, o, and p-Benzanes, dimothyl-
2802	Non-Destructive	Lacquer, Olive Drab	8010-00-584-3149	1984	4 pts	4.2	1.9	Totuol	27	0.8	464	108-44-5	Benzene, Methyl-; Methylbenzene; Toluci
	Inspection Shop							Xylal	24	0.4	454	1330-20-7	m.o,p-Xylenos; m. o, p-Benzense dimethyl-
2802	Non-Dastructive	Lecquer, White	8010-00-290-8983	1984	. 12 pts	12.5	5.7	NS	-	-	·	-	
2802	Non-Destructive	Leyout Dye, Stue	8950-00-884-9087	1984	1 pt	1.0	0.6	Methy Alcohol	48	0.24	2,270	87-58-1	Methanol; Wood Alcohol; Wood Naptha; Columbian Spirita
	Inspection Shop							Isopropyl Alcohol	38	0.19	NL	67-83-0	Isopropand; 2-Propand; Propyl Alcohol; Dimethylcarbinol
2802	Non-Destructive	Lubricant	9160-00-754-0084	1989	1 can	0.75	0,3	Tutuol Methylene Chloride	30 30	0.1 0.1	464 464		Totuene; Methyl Benzene Freen 30; Dichloramethune; DCM
	Inspection Shop							Propane Isobutana	25 26	0.1	NL NL	74-B8-8	Dimethylmethane; Propyl Hydride Diethyl; Methylethylmethane
2802	Non-Destructive	Lubricating Oil, General Purpose	9 150-00-273-2397	1988	2 oz	0.125	0.06	Petroleum, Refined	NS	-			••
2802	Non-Destructive Inspection Shop	Lubriceting Oil, General Purpose	9150-00-273-2397	1986	2 02	0.125	0.08	Petroleum, Refined	NS				
2802	Non-Destructive Inspection Shop	Lubricating Oil, Synthetic, Aircraft Turbine Engine (10W)	9150-00-782-2827	1985	1 qt	2.1	0.9	Tricresyl Phosphate	NS	-	-		··
2802	Non-Destructive Inspection Shop	Lubricating Oil, Synthetic, Aircreft Turbine Engine (10W)	9 160-00-782-2827	1984	1 qt	2.1	0.9	Tricresyl Phosphata	NS				
2802	Non-Destructive	Magna Flux	8850-00-782-2740	1986	24 cens (13-oz es)	19.6	9.8	Methyl Chloroform	97	8.6	454	76-09-2	Freen 30; Dichtoromethane: DCM

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Fecülty ID	Workplace Storage Area	Product	NSN	Yezr	Product Quantity Stored	Product (Tb)	Product (kg)	Constituent	Constituent (%)	Constituent Mass (kg)	Reportable Quantity (kg)	CASRN	Synonym(=)
2802	Non-Destructive Inspection Shop	Magnafkux Developer ZP-13A, Water Soluble	8750-PZP13A	1984	120 lb	120	54.4	NS			-	••	
2802	Non-Destructive Inspection Shop	Magnaflux Penetrani 2L-22A	6850-00-782-2740	1984	1800 cc	3.98	1.8	Petroleum Solvente Surface Active Agente	69 NS	1.2			
2802	Non-Destructive Inspection Shop	Magne Tech	6850-00-841-1347	1989	8 cans (12-oz es)	8	2.7	Kercsens Dichlorodifluoro- methane Fluorescent	NS NS NS		NL NL NL		Cost Oll Frech F-12; Fluorocarbon-12
		<u></u>						Magnetic Particles	145		NL	••	
2802	Non-Destructive Inspection Shop	Magneflux Fluid	6850-00-198-5472	1989	θ cans (5-gal esi	333.8	161.4	Petroleum Distillates	100	151.4	NL	64475-85-0	Minerel Spirits; Stoddard Solvent; V.M. and P. Napthe
2802	Non-Destructive Inspection Shop	Megnatiux Developer 2P-98	6350-00-762-2740	1984	1800 cc	0.18	0.07	Methy Chloroform	62	0.04	454	71-66-8	Ethane, 1, 1, 1-Trimethyl; Methyltrichloromethane; Chlorothane NU; Chlorothane NU
								Carbon Diexide- Chloromethane Mixture	28	0.02	NL	124-38-9	NU Carbonic Acid Gas; Carbonic Aldehyde
2802	Non-Destructive Inspection Shop	Magneflux 2E-3 Emulsifier	8850-01-024-5772	1986	100 gal	834.6	378.5	NS				, <del>.</del>	••
	Non-Destructive Inspection Shop	Magnetic Inspection Oil	6850-00-274-5421	1986	9 oz	0.8	0.3	NS			-		**
	Non-Destructive Inspection Shop	Magnetic Inspection Compound	6850-00-841-1347	1984	9 oz	0.68	0.28	NS		••			
	Non-Destructive Inspection Shop	Magnetic Inspection Oil	6850-00-841-1347	1988	12 cens (12-oz ce)	8.76	4.0	Kerosone Carbon Dioxida	97 3	3.9 0.1	NL NL	8008-20-8 124-38-9	Coal Dil Carbonic Acid Gas; Carbonic Anydride
								Fluorescent Magnetic Particles	< 0.6	< 0.02	NL		
	Non-Destructive Inspection Shop	Methano)	8610-00-597-3808	1993	1 pt	1.0	0.46	Mathyl Alcohol	99	0.45	2,270	87-58-1	Methyl Alcohol; Wood Alcohol; Columbian Spirite
	Non-Destructive Inepection Shop	Methanol	8810-00-597-3608	1992	1 pt	1.0	0,46	Mathyl Alcohol	.99	0,45	2,270	87-58-1	Methyl Alcohol; Wood Alcohol; Columbian Spirite
	Non-Destructive Inspection Shop	Methanol	6810-00-597-3608	1989	1 gaj	8.3	3.8	Methyl Alcohol	89	3,8	2,270	87-68-1	Methyl Alcohol; Wood Alcohol; Columbian Spirite
	Non-Destructive	Navel Oil Standards	8650-00-178-5145	1993 ·	4 bottles	21	9.6	Grada 1100 0.1	99	9.4	NL		
	Non-Destructive Inspection Shop	Naval Oil Standards	6650-00-178-5145	1992	4 bottles	21	9.6	Grada 1100 0,1	99	9.4	NL		
	Non-Destructive	Peint, Aerosol, Blue	8010-00-141-2951	1985	4 cans (18-oz ee)	4	1.8	Toluene	40	0.7	464	108-88-3	Banzene, methyl-; Mathylbenzene; Tolugi

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FecBty ID	Workplace Storage Area	Product	NSN	Yanr	Product Quantity Stored	Product (tb)	Product (kg)	Constituent	Constituent (%)	Constituent Mass (kg)	Reportable Quantity (kg)	CASRN	Bynonym(s)
2802	Non-Destructive	Paint, Acrosol, She	8010-00-141-2951	1984	NS		-	Totuol	NS		454	108-88-3	Taluene; Banzone, mathyl-; Mathylbenzene; Talual
	Inspection Shop							Xylol	. NS		464	1 330-20-7	Benzne, dimethyl-; m, o, and p-Xylenes; m, o, and p-Dimethylbenzene
								Methiens Chiorida	NS		454		Feron 30; Dichloremathane; DCM
2802	Non-Destructive	Peint, Astosol, Red	8010-00-141-2962	1986	• 6 cans (13-oz ea)	4.9	2.2	Toluene Methylana Chlorida	24.1 28.7		454 454		Freen 30; Dichleremethane; DCM
2802	Non-Destructive	Paint, Collulose	8010-00-251-8495	1988	1 gal	8.3	3.8	Isobutyl Acetste	25	1.0	2,270	110-19-0	2-Methylpropyl Acetate; B-Mathylpropyl Ethanoste
	Inspection Shop	Nitrato, Clear						Isobutyl Alcohol	8	0.3	2,270 <sub>.</sub>	78-83-1	
				·				Totuana	15	0.6	454	108-88-3	
								Napthe, Aliphetic	15	0.8	NL	8030-30-6	Benzin; Coal Tar Napths; Potroloum Distillation (Napthal;
								V.M. and P. Nepthe	8	0.3	NL	84476-85-0	Petroleum Mineral Spirits; Petroleum Spirits; Stoddard Solvent
2802	Non-Destructive	Paint, Aluminum, Heat	8010-00-884-7468	1986	1 qt	2.1	0.9	Mineral Spirite	49.2	. 0.4	NL	64475-85-0	Petroleum Spirite; Stoddard Solvent; V.M. and P. Naptha
	Inspection Shop	Resistant						V.M. and P. Naptha	10	0.1	NL	64476-85-0	Mineral Spirits; Petroleum Spirits; Stoddard Bolvent
2802	Non-Destructive	Paint, Aluminum, Heat	8010-00-815-2692	1984	1 can	8.4	3.8	Akıminum Silicon Alkyd	NS NS		NL	7429-90-5	Atuminum Powder
	Inspection Shop	Resistant			(1-gal ea)			V.M. and P. Napthe	NS	-		64475-85-0	Mineral Spirits; Petrolaum Spirits; Stoddard Solvent
2802	Non-Destructive Inspection Shap	PD-680 Dry Cleaning Solvent	6850-00-274-5421	1986	180 gal	1,502.1	681.4	Stoddard Solvant	100	681.4	Nî.	8052-41-3	Dry Claaning Bafety Solvent; Minorel Spirita; Petroleum Solvent; Spatting Napthe; Nepthe Bafety Solvent; White Spirite
2802	Non-Destructive Inspection Shop	PD-680 Dry Cleaning Solvent	8850-00-294-6421	1984	220 gal	1,836.9	832.6	Stodderd Solvent	100	832.8	NL	8082-41-3	Dry Cleaning Safety Solvent; Mineral Spitts; Petroleum Solvent; Spotting Napths; Naptha Safety Solvent; White Spirite
2602	Non-Destructive	Penetrant ZL-22A	6850-00-782-2736	1993	60 gal	417.3	189.3	Petrolsum Hydrocarbons	70	132.3	NL,	-	
	Inspection Shop	1						Diphenylocyto Phosphete	16	28.4	NL		
								Ethoxylated Octyl Phenol	10	18.9	NL		
	1						1	Fluorescent Dys	6	9.6	NL		

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Central Airfield FOSET Atch 3 (Page 21 of 27)



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#### Table C-3, Page 17 of 20

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FecBty iD	Workplace Storage Aree	Product	NSN	Vaar	Product Quentity Stored	Product (4b)	Product (kg)	Constituent	Constituent	Constituent Moss (kg)	Reportable Quantity (kg)	CASRN	. \$ynonym{#]
2802	Non-Destructive Inspection Shop	Penetrant ZL-22A *	6850-00-762-2736	1992	80 gzl	417.3	189.3	Patroleum Hydrocarbons	70	132.3	NL		· · · · · · · · · · · · · · · · · · ·
			1				1	Diphenylocyte Phosphete	15	28.4	NL	-	-
						I .		Ethoxylated Octyl Phanel	10	18,9	NL		-
2802	Non-Destructive Inspection Shop	Penetrant ZL-22A	6850-00-782-2740	1985	6 cans (300cc ss)	0.08	0.04	Fluorescent Dye Petroleum Hydrocerbone	69	9.6 0.03	NL NL	· •	
2802	Non-Destructive Inspection Shop	Penetrating Fluid	6850-00-973-8091	1985	2 cans (12-oz es)	1.6	0.7	NS					
2802	Non-Destructive Inspection Shop	Penetrating Fluid	8850-00-873-9091	1984	2 cane (12-oz es)	1.5	0.7	NS	<del>.</del> .	-			
2802	Non-Destructive	Petroletum, White, USP	8505-00-133-8025	1988	1 05	1	0,5	Petrolatum, White, USP	100	0.5	NL.		
2802	Non-Destructive Inspection Shop	Petrolatum, White, USP	6505-00-133-8025	1986	6 ib	8	2.7	Petrolatum, White, USP	100	2.7	ML		
	Non-Destructive Inspection Shop	Petrolatum, White, USP	8606-00-133-8026	1984	6 (Ъ	8	2.7	Petroletum, White, USP	100	2.7	NL		
2802	Non-Destructive Inspection Shop	Photographic Fixer	8760-00-092-6064	1985	480 gei	4,005.8	1,810.9	Sulfuric Acid	NS		464	. 7004-93-9	Oži at Vikrol
2802	Non-Destructive Inspection Shop	Photographic Fixer and Replanisher	6760-00-092-5054	1984	480 gel	4,005.6	1,816.9	Ammonium Thiosulfate	NS			. <del>.</del>	-
								Water Sodium Acetate Ammonium Sulfate	NS NS		NL NL	7732-18-6	-
2802	Non-Destructive	Pine Oil Cleanar	6840-00-887-7804	1989	4 1-gt	8.3	3.8	Sulfuric Acid	NS		464	7664-93-9	Oil of Vitrol; Sulphuric Acid
	Inspection Shop				bottles	0.3	<b>9.0</b>	Oil Fat Acids Anhydrous Soda Soap	NS NS NS	=	-	  	
2802	Non-Destructive Inspection Shop	Polyurethane Coating	8010-00-926-9174	1985	NS			Toluene Dileo- yanate	0.3			+	•-
								Aromatic Hydro- carbons Aliphatic Hydro-	7	-		-	••
								carbons Ether Ester Acatato	42	-	-		••
	Non-Destructive Inspection Shop	Primer, Grey	8010-00-616-9161	1985	4 cens (13-oz es)	3.26	1.6	Toluoi	NS		464	108-88-3	Benzene, methyl-; Methylbanzene, Toluol
2802	Non-Destructive	Primer, Gray	8010-01-016-9181	1984	4			Xylol	NB		464		m, o, and p-Benzenes, dimethyl-
	Inspection Shop		5010-01-010-9181	1884	4 cans (13-oz es)	3.25	1.6	Toluene Xylene (mixed)	NS		454	108-88-3	Banzone, methyl-; Methylbenzone, Totuol

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#### Table C-3, Page 18 of ZO

able C-3	3, Page 18 of ZO Workplace Storage Aree	Product	NSN	Yaar	Product Quantity Stored	Product (25)	Product (kg)	Constituent	Constituent (96)	Constituent Mass (kg)	Reportable Quantity (kg)	CASRN	Synonym(s)
2802	Non-Destructive Inspection Shop	Primer. Zinc Chromate, Green	8010-00-899-8825	1986	6 cans {13-oz ea}	4.9	2.2	Toluene Ethyl Acatete	19 12	0.4 0.3	464 464	108-88-3 141-78-8	Methylbenzene; Toluci Acetic Ether: Acetoxysthene;
								Methylene Chloride Aliphetic Thinner Chrome VI	22 19 NS	0.5 0.4	454 	75-09-2	Vinegar Nepths Freen 30; Dichleromethene; DCM  Chremkum
2802	Non-Destructive	Silicone Compaund	6850-00-860-7618	1989	1 can {8-oz ca}	0.6	0.2	Silicone Compound	100	0.2	NL	7440-21-3	Nane
2802	Inspection Shop Non-Destructive Inspection Shop	Silver Cleaner	4931-00-408-1511	1984	1.6 oz	0.09	0.04	Freen 12 Freen 1 13	NS NS		NL NL	75-71-8 78-13-1	Dichlorodifluomethane; Fluorocarbon-12 1, 1, 2-Trichlorotritluoroethane; Flurocarbon-113
2802	Non-Destructive Inspection Shap	Spectrometric Celibration Standard (3 ppm Conclusive)	8850-00-160-0570	1985	96 oz	6	2.7	NS					
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (3 ppm Conclusive)	6650-00-180-0670	1984	98 oz	8	2.7	NS	·				
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (0 ppm Conclusive)	6650-00-179-5137	1986	98 oz	, ,	2.7	NS		•			
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (O ppm Conclusive)	6650-00-179-6137	1884	98 oz		2.7	N5				-	
2802	Non-Destructive Inspection Shop	Spectrometric Celibration Standard	6660-00-179-5141	1986	98 oz	6	2.7	NS		••		-	
2802	Non-Destructive Inspection Shop	Spectrometric Celibration Standard	6850-00-179-5141	1984	96 az	0	2.7	NS					
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (100 ppm Conclusive)	6650-00-179-5142	1986	96 oz -	6	2.7	NS		-	••	-	
2802	Non-Destructive Inspection Shop	Spectromatric Calibration Standard (100 ppm Conclusive)	8650-00-179-5142	1984	86 oz	6	2.7	NS			-		·
2802	Non-Destructive Inspection Shap	Spectrometric Catibration Standard (50 ppm Conclusive)	6650-00-178-5143	1985	98 cz	6	2.7	NS	-				-
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (60 ppm Conclusive)	8850-00-178-5143	1984	98 oz	6	2.7	NS			-		
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (30 ppm Conclusive)	8650-00-179-5144	1986	98 02	6	2.7	NS					
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (30 ppm Conclusive)	8850-00-179-6144	1984	95 oz	8	2.7	NS		•/			

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Fac®ty ID	Workplace Storage Area	Product	NSN	Yeer	Product Quantity Stored	Product (D)	Product (kg)	Constituent	Constituent	Constituent Mess (kg)	Reportable Quantity (kg)	CASRN	Synonym(s)
2802	Non-Destructive Inspection Shop	Spectrometric Celibration Standard (10 ppm Conclusive)	8850-00-179-5146	1986	96 oz	8	2.7	NS	-				
2802	Non-Destructive Inspection Shop	Spectrometric Calibration Standard (10 ppm Conclusive)	8850-00-179-5145	1984	98 oz	8	2.7	NS	-		••		
2802	Non-Destructive Inspection Shop	Spectrometric Celibration Standard	6850-00-841-1347	1985	98 oz	8	2.7	NS					······································
2602	Non-Destructive Inspection Shop	Spectrometric Celibration Standard	8660-00-641-1347	1984	96 oz	8	2.7	NS	-				-
2802	Non-Destructive Inspection Shop	Spray Kit, Self- Pressurized	4940-00-803-8444	1986	1 kit	1	0.5	Diffuerodichloro- methans Isobutans Trichlorottiffuero- ethane	NS NS NS		NL NL NL		Freen F-12; Fluerocarbon-12 Diethyl; Methylethylmsthane Freen 113 TR-T; Fluerocarbon
2802	Non-Destructive Inspection Shop	Sultur Hexetluoride	8830-00-817-2342	1993	0.1 cylinder	10	4.5	Sulfur Hexafluoride	99	4.6	NL	2661-82.4	113 Sultur Fluoride
2802	Non-Destructive	Sulfur Hexefluoride	6830-00-B17-2342	1892	0.1 cylinder	10	4.5	Sulfur Hexefluoride	89	4.5	NŁ,	266 1-82-4	Sulfur Fluoride
2802	Non-Destructive Inspection Shop	Toilet Deodorant	8840-00-246-8438	1993	6 gal	41.7	18.9	p-Dichiorobenzena	99	18.7	45.4	108-45-7	Benzene, 1.4-dichlara-; p-Dichlorobenzene; 1.4-Dichlorobenzene; Peredichlorobenzene; PDCB
2802	Non-Destructive Inspection Shop	Tollet Deodorant	8840-00-248-8438	1992	6 gal	41.7	18.9	p-Dichlorobenzene	88	18.7	46.4	108-48-7	Benzene, 1,4-dichloro-; p-Dichlorobenzene; 1,4-Dichlorobenzene; Peradichlorobenzene; PDCB
2802	Non-Destructive	Ultrasonic Couplant	6810-01-167-4348	1985	4.ge)	33.4	15.1	NS		-			
2802	Nan-Destructive	Ultrasonic Couplant	6810-01-157-4348	1984	4 gal	33.4	16.1	NS		-	·		••
2802	Non-Destructive Inspection Shop	Urea, Technical	8810-00-782-8521	1993	20 %	20	9,1	Ures	89	9	NL		•-
	Non-Destructive	Uree, Technical	8610-00-782-6521	1992	20 th	20	9,1	Utea	89	9	NL	***	••
	Non-Destructive Inspection Shop	ZP-14 Developer	8860-PZP-14	1988	2 bags (50-lb eal	100	46.4	Sodium Dichromate	6	2.3	4.54	7775-11-3	**
	Non-Destructive Inspection Shep	Zyglo Penstrent ZL-4A		1884	36.7 gel	308.3	138.9	NS			-		**
	Non-Destructive	Zygło Penetrant ZL+36		1984	27.6 gal	229.5	104.1	NS					**

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#### Table C-3, Page 20 of 20

Facility (D	Workplace Storage Area	Product	NSN	Year	Product Churnthy Stored	Product (lb)	Product (kg)	Constituent	Constituent (%)	Constituent Mass (kg)	Reportable Quantity (kg)	CASRN	Synonymis)
		Zygio Penetrant ZL- 22A	6850-00-782-2736		66 gel	459.0	208.2	Petroleum Hydro- carbons Diphanyl Loctyl Phosphate	ns NS				•• ••
								Ethoxylsted Octylphanol Fluorescent Dye, Organic	NS NS				••
	Non-Destructive Inspection Shop	Zyglo Panstrent ZL- 22A	6850-00-782-2736	1986	55 gal	459.0	208.2	Petroleum Hydro- cerbons Diphenyl Loctyl Phosphete	ns Ns	 			**
		-				-		Ethoxylsted Octylphenol Fluorescent Dye, Organic	NS NS		-	-	- -

Not listed as a hazardaus substance in 40 CFR 302.4

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Notes: NL = Not listed as a hazardous substance in 40 CFR 302.4 NS = Not stated NRQA = No reportable quantity assigned to the generic or broad class, according to 40 CFR 302.4.

Source: Hezerdous Material Inventory forms (AF Form 2761) in the Industrial Facility Workplace files meintained by the Bisenvironmental Engineering Section.

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Facility ID	Workplace Storage Area	. Waste	Year	Waste Quantity Stored (gal/yr unless stated)	Waste Pounds	Waste Kilograms	RCRA Waste Number
2050,-	Central Heating Plant	Lubricating Oil (No. 7808)	1993	15	125	57	
2753	Electro-Environmental Shop	Sulfuric Acid	1993	180	1,502	681	D002
2753	Propulsion Non-Powered AGE (JENP)	Hydraulic Fluid (Engine)	1993	55	459	208	D018
2753	Pneudraulics Shop	CitriKleen Solvent	1993	400	3,338	1,514	D006, D007
		Hydraulic Fluid (Engine)	1993	800	6,676	3,028	D018
_		PD-140 Solvent	1993	400	3,338	1,514	D006
2763	Accessory Repair Shop	Carbon Remover	1993	10	83	38	DO27, DO30
							D033, D034 D036, D043
		Hydraulic Fluid (Engine)	1993	<1	<8	<4	D018
_	· .	PD-140 Solvent	1993	660	5,508	2,498	D006
2763	Wash Rack	CitriKleen Solvent	1993	1,980	16,524	7,495	D006, D007
		Pen Air M-5571	1993	3,300	27,539	12,492	
2763	Wheel and Tire Shop	Formula 724	1993	60	501	227	D006
2774	Hazardous Materials Pharmacy	Hydraulic Fluid (Engine)	1993	3	25	11	D018
		JP-4 Jet Fuel	1993	252	2,103	954	D001
		Lubricating Oil (No. 7808)	1993	504	4,206	1,908	••
2785	Vehicle Maintenance Shop	Lubricating Oil	1993	5	42	19	
		Lubricating Oil (Miscellaneous)	1993	NS	NS	NS	D006, D008 D018
		Lubricating Oil (No. 5606)	1993	100	835	379	
		Lubricating Oil (No. 7808)	1993	100	<b>835</b> .	379	
		Paint	1993	NS	NS	NS	••
2801	Precision Measurement Equipment Laboratory (PMEL)	Lubricating Oil (Mineral)	1993	3	25	11	D008

Plattsburgh AFB Environmental Baseline Survey

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Facility ID		Waste	Year	Waste Quantity Stored (gal/yr unless stated)	Waste Pounds	Waste Kilograms	RCRA Waste Number
2802	Non-Destructive Inspection Shop	Photographic Developer	1993	200	1,669	757	D007
		Lubricating Oil	1993	30	250	114	
		Lubricating Oil (Mag.)	1993 :	120	1,001	454	D010, D018 D019, D028 D029, D039 D040, D043
		Penetrant	1993	110	918	416	D018, D019, D022, D028, D029, D030, D032, D033, D039, D040, D043
		Penetrant Remover	1993	110	918	416	D027, D030, D032, D033, D034, D036, D037, D042, D043
2815	Aerospace Ground Equipment Shop	PD-140 Solvent	1993	. 80	668	303	D006
		Hydraulic Fluid (Pump)	1993	100	835	379	D043
		Lubricating Oil (Mineral)	1993	1,200	10,014	4,543	D018
		Lubricating Oil (Synthetic)	1993	NS	NS	NS	D010, D018, D019, D021, D028, D029, D039, D040, D043, D035
		Carbon Remover	1993	10	83	38	D027, D030, D032, D033, D034, D036, D043
	Fuel System Maintenance	JP-4 Jet Fuel	1993	NS	NS	( NS	D001
2820	Jet Engine Test Cell (JETC)	CitriKleen Solvent	1993	60	501	227	D006, D007 <sup>:</sup>
		CitriKleen and Solvent Mixture	1993	204	1,702	772	D018
		Hydraulic Fluid (Engine)	1993	1	8	4	D018
		JP-4 Jet Fuel	1993	252	2,103	954	D001

Plattsburgh AFB Environmental Baseline Survey

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#### May 1997

<u></u>	vage 4 of 4 Workplace Storage	Агеа	Waste	Year	Waste Quantity Stored (gal/yr unless stated)	Waste Pounds	Waste Kilograms	RCRA Waste Number
Facility ID	Snow Barn	A104	Hydraulic Fluid (Pump)	1993	36	300	. 136	D010
2827			Lubricating Oil (Motor)	1993	600	5,007	2,271	• -
0040-	Fuels Branch		Paint	1993	NS	NS	NS	
2044	Armory		Lead Seals	1993	NS	NS	NS	D008
0000	Structural Maintenance	Shop	Alodine Coating	1993	60	501	227	D007
			B&B 9201	1993	60	501	227	D006, D007, D008
			Methyl Ethyl Ketone (MEK)	1993	480	4,006	1,817	D035
			Polyurethane Lacquer	1993	60	501	227	D001
D001: IginitatioD032: HiD002: Corrosive wasteD032: HiD003: Reactive wasteD033: HiD006: CadmiumD034: HiD007: ChromiumD035: MiD008: LeadD036: NiD010: SeleniumD037: PeD018: BenzeneD039: TeD019: Carbon TetrachlorideD040: TeD021: ChlorobenzeneD042: 2		D CFR 261 and/or 6 NYCCR 2,4-Dinitrotoluene Hexachlorobenzene Hexachlorobutadiene Hexachloroethane Methyl Ethyl Ketone Nitrobenzene Pentachlorophenol Fetrachloroethylene Frichloroethylene 2,4,6-Trichlorophenol Vinyl Chloride	Part 371.	``				

D029: 1,1-Dichloroethylene <sup>2</sup>Description of waste product(s) as listed in data base obtained from the Plattsburgh AFB Environmental Flight. For years where more than one type of waste product (e.g., xylene and toluene) for a specific regulatory waste number (e.g., F003) was stored, the cumulative weight of the wastes has been listed in the quantity columns.

Plattsburgh AFB Environmental Baseline Survey

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#### **NOTICE OF HAZARDOUS SUBSTANCES RELEASE**

Notice is hereby provided that the information set out below from the Basewide EBS and its Supplement provides notice of hazardous substances that have been known to be released on the **Central Airfield Area** 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, Compensation, and Liability Act (CERCLA or "Superfund") 42 U.S.C. Section 9620(h).

Substance	Regulatory Synonym	CAS Registry Number	Quantity (kg/pounds) or Concentration	Date	Hazardous Waste ID Number (if applicable)	Response	Remarks
Anhydrous Ammonia	Unknown	Unknown	Unknown	May 20, 1992	Unknown	Yes	SPL-2710; listed on the NYSDEC Spill #9202051. Status: Closed.
Mercury	Unknown	Unknown	Unknown	April 1994	Unknown	Yes	SPL-2789; spill was cleaned up with a HEPA vacuum and the Mercury was properly disposed of.
Ethylene Glycol	Unknown	Unknown	Approximately 200 gallons	February 20, 1989	Unknown	Yes	SPL-2812; listed on the NYSDEC Spill #8809186. Status: Closed.
Fuel and Chlorinated Solvents	Trichloroethene (TCE), Dichloroethene (DCE), Vinyl Chloride, Fuel Compounds (BTEX)	Unknown	Up to 390,000 ppb VOCs in Soil; up to 10,000 ppb VOCs in Groundwater	1950s to 1989	Unknown	Yes	IRP Site FT- 002; Remedial Systems and Institutional Controls in place and in operation.
Fuel, Chlorinated Solvents, and Aircraft Exhaust Particulates	TCE, DCE, BTEX, Poly Aromatic Hydrocarbons (PAHs), Metals	Unknown	Up to 100,000 ppb Total PAHs in the soil; Up to 2,300 ppb Lead in the soil.	1950s to 1989	Unknown	Yes	IRP Site SS- 004; Remedial Investigation (RI) complete, Draft Proposed Plan in progress.

#### Hazardous Substances Releases – Central Airfield Area

Substance			ostances Relea				Domo-l-a
Substance	Regulatory Synonym	CAS Registry Number	Quantity (kg/pounds) or Concentration	Date	Hazardous Waste ID Number (if applicable)	Response	Remarks
Solvents, Dyes, Photographic Solutions	Methylene Chloride, Xylenes, Phenols, PAHs, Metals	Unknown	Up to 25,000 ppb PAHs in the Soil	Unknown	Unknown	Yes	IRP Site SS- 005; ROD signed March 1998; specifies Land Use Controls/ Institutional Controls (LUC/ICs).
Solvents, Fuel, Hydraulic Fluid, Antifreeze	PAHs and Metals	Unknown	Up to 650 ppb Total SVOCs in the Soil	Unknown	Unknown	Yes	IRP Site SS- 006; ROD signed March 1998; specifies LUC/ICs
Fuel, Oils, Solvents	Dichlorobenzene, Trichloroethene, napthalene	Unknown	Unknown	Unknown	Unknown	Yes	IRP Site SS- 017; SVE system operated from 1997-2002. No Further Action ROD signed 2002.
Municipal Wastes	Vinyl Chloride, Dichlorobenzene, BTEX, Arsenic, Metals	Unknown	4,588 ppb BTEX in the Groundwater; 10-20 ppb Arsenic in the Groundwater	1966-1982	Unknown	Yes	IRP Site LF- 023; Landfill was capped in 1994; area contains Institutional Controls; Long-Term Monitoring in progress.
Solvents	Trichloroethene	Unknown	Up to 102 ppb Trichloroethene in the soil	Unknown	Unknown	Yes	IRP Site SS- 027; No Further Action Decision Document completed 2004.
Fuels, Solvents	BTEX, Trichloroethene	Unknown	200 gallons Jet Fuel	June 16, 2000	Unknown	Yes	IRP Site SS- 029; Jet Fuel Spill subsequent to IRP activities; NYSDEC Spill #0045040. Status: Closed. Revision of IRP No Further Decision Document is in progress.

#### Hazardous Substances Releases – Central Airfield Area

Substance	Regulatory Synonym	CAS Registry Number	Quantity (kg/pounds) or Concentration	Date	Hazardous Waste ID Number (if applicable)	Response	Remarks
Burried Drums (pesticide, Crack Sealant, Sludge)	Pesticides, VOCs, SVOCs	Unknown	Up to 32,000 ppm VOCs and 1,378 ppm Pesticides in the soil	Unknown	Unknown	Yes	"Pre-Air Force" buried drums and construction debris encountered during construction of IRP Site FT- 002 extraction wells. 16 Drums and 281 cubic yards of soil removed. No further action planned.

#### Hazardous Substances Releases – Central Airfield Area

Note: More information on NYSDEC listed spills can be found at http://www.dec.ny.gov/cfmx/extapps/derexternal/index.cfm?pageid=2

New York State Department of Environmental Conservation Division of Environmental Remediation

Remedial Bureau A, 11th Floor 625 Broadway, Albany, New York 12233-7015 Phone: (518) 402-9625 • Fax: (518) 402-9627 Website: <u>www.dec.ny.gov</u>



July 2, 2010

Mr. David Farnsworth AFCEE/EXC Plattsburgh 304 New York Road Plattsburgh, New York 12903

> Re: Central Airfield FOSET Plattsburgh Air Force Base, 510003

Dear Mr. Farnsworth:

The New York State Department of Environmental Conservation (Department), in consultation with the New York State Department of Health, has reviewed the draft Central Airfield Finding Of Suitability for Early Transfer (FOSET), the draft Supplemental Environmental Baseline Survey (SEBS), and the Covenant Deferral Request (CDR) and offers the following comment:

We understand that there are several documents in review relative to the properties proposed for transfer and each document has a potential impact on the others. Although this letter was prepared to respond to the draft FOSET, draft SEBS, and draft CDR, this comment will also apply to the draft FT-002 ROD. All of these documents include a reduction in the size of the area where the Institutional Controls (ICs) created to address the potential for soil vapor intrusion (SVI) would apply. The Department disagrees with the proposal to reduce the area at this time. The IC boundary for SVI established during the Golf Course, Industrial and Western areas FOSET was the boundary of the FT-002 GW operable unit. The SVI IC boundary and the FT-002 GW operable unit boundary should remain the same at this time. We do not currently have the data to support a decision to reduce the size of the area to which the ICs for SVI apply.

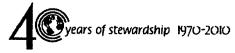
The ICs for SVI were created "with respect to risks that may be posed via indoor air contaminated by chemicals volatilizing from the groundwater (vapor intrusion)". It is this potential for groundwater contamination to present a threat for soil vapor intrusion which is not addressed in the reduction. In order to remove the SVI ICs from a property we would need soil vapor data and groundwater data which confirmed that the groundwater contamination has decreased sufficiently and that the potential for soil vapor exposure does not exist. The Department is always willing and able to work with the Air Force and the USEPA to develop the information which would be necessary to support a decision to extinguish any institutional controls.

Sincerely,

Daniel J. Eaton

- cc: R. Morse
  - S. TerMaath
  - S. Gagnier
  - R. Fedigan
  - W. Kuehner
  - C. Vasudevan
  - J. Swartwout

Note: I will send a separate comment letter for the FT-002 ROD.



### FARNSWORTH, DAVID S YD-02 USAF AETC AFCEE/EXC

From:	Morse.Bob@epamail.epa.gov
Sent:	Monday, August 02, 2010 6:47 PM
To:	FARNSWORTH, DAVID S YD-02 USAF AETC AFCEE/EXC
Cc:	djeaton@gw.dec.state.ny.us; Carpenter.Angela@epamail.epa.gov;
	Doyle.James@epamail.epa.gov; Malleck.John@epamail.epa.gov
Subject:	Central Airfield FOSET, CDR, SEBS

Dave,

As noted in our July 9, 2010 letter to you regarding the draft FT-002 / Industrial Area Groundwater OU Supplemental Proposed Plan (FT-002 Supplemental PRAP), the Central Airfield FOSET, CDR, and SEBS were essentially drafted and submitted simultaneously with the FT-002 Supplemental PRAP, and these documents are based on the same underlying remedial decisions as the FT-002 Supplemental PRAP. Therefore, until we resolve the issues raised during the July 30, 2010 conference held between EPA, the Air Force, and NYSDEC regarding the FT-002 Supplemental PRAP, EPA does not believe it is appropriate to comment on the Central Airfield FOSET, CDR, or SEBS. We share the goal of expeditiously remediating the base, and of returning Air Force property to the community for reuse, and look forward to the next conference call to be held regarding the FT-002 Supplemental PRAP once it is scheduled. If you have any questions regarding this email, please feel free to call or email me. Thanks.

Bob

#### FARNSWORTH, DAVID S GS-13 USAF DoD AFCEE/EXC

From:	Morse.Bob@epamail.epa.gov
Sent:	Tuesday, March 15, 2011 12:29 AM
То:	FARNSWORTH, DAVID S GS-13 USAF DoD AFCEE/EXC
Cc:	Doyle.James@epamail.epa.gov; Metz.Chloe@epamail.epa.gov;
	Smith.Lora@epamail.epa.gov; Carpenter.Angela@epamail.epa.gov;
	Malleck.John@epamail.epa.gov; djeaton@gw.dec.state.ny.us; jbswarto@gw.dec.state.ny.us
Subject:	EPA Comments on the Central Airfield FOSET, CDR, and SEBS
Attachments:	CDR.pdf; FOSET.pdf

#### Dave,

EPA received the draft final Central Airfield FOSET, SEBS, and CDR documents via email on February 2, 2011. EPA has reviewed the FOSET documents and EPA's comments are presented below. In addition to the comments below, additional comments were sent to you by EPA Region 2 attorney Jim Doyle on March 11. Jim's email to you consisted of marked up versions of portions of the FOSET and CDR, which we hope to discuss with you and Carolyn White on Tuesday. I have reattached those markups so you have a complete set of EPA comments with this email. - The markups are summarized and addressed as items 3f throug 3V in Attachment 6.

The draft final FOSET does not accurately capture recent agreements made between EPA, 1) NYSDEC, NYSDOH and the Air Force with respect to the soil vapor intrusion (SVI) LUC/IC restriction boundary for the FT-002 Groundwater Operable Unit (OU). The overall LUC/IC restriction boundary for SVI appears to be correct for vacant property as shown in Attachemnt 5B of the FOSET and Exhibit 2B of the CDR. However, according to IC # 6 in Attachemnt 5B of the FOSET and Exhibit 2B of the CDR, the building modification portion of the SVI IC only applies to the 3 buildings where SVE systems were installed to address SVI (Buildings 2753, 2766, and NB-C). The other 11 buildings in the SVI study, and a number of other buildings in the SVI LUC/IC restriction area that were never evaluated for SVI, are not covered by the building modification portion of the SVI IC as the IC language appears in IC # 6. This is not acceptable. The boundary lines shown around buildings 2753, 2766, 2612, and NB-C need to be removed in Attachment 5B and Exhibit 2B, and the language for IC # 6 needs to be replaced with the original SVI IC language agreed to by EPA, NYSDEC, NYSDOH, and the Air Force, and as memorialized in the 2009 Golf Course FOSET, so that the SVI IC with respect to building modifications applies to all buildings within the agreed-upon SVI IC restriction boundary. During the discussions held over the past several months regarding the SVI IC and other LUC/IC restriction boundaries, EPA operated under the assumption that the SVI IC language under discussion was the same SVI IC language utilized in the 2009 Golf Course FOSET, and that is the language that must be used in the Central Airfield FOSET. The SVI IC language needs to be corrected on page 11 of the FOSET (FT-002 Groundwater OU discussion) to add modifications to existing buildings (text currently only addresses future construction). Additional text is in need of correction / replacement as discussed below.

Attachment 5B (FOSET) and Exhibit 2B (CDR) do not agree with text found in the FOSET and CDR in several respects:

a) NB-C: It is EPA's understanding that NB-C is located within the FOSET property. It is shown in Attachment 5B and Exhibit 2B as restricted for SVI. However, it is not discussed in any of the documents. A full discussion of NB-C needs to be provided in the documents (see FOSET pg 11, FT-002 Groundwater OU (only buildings 2753 and 2766 are discussed); FOSET pg 35, section 5.10, Indoor Air Quality (again only Buildings 2753 and 2766 are discussed); and the CDR, pages 8 through 10, FT-002 Groundwater OU discussion of buildings in the SVI study that required additional actions did not include NB-C.

1

b) Section 8.1.5 of the CDR needs to be completely rewritten to address Comment # 1 above. This includes replacing the SVI IC language currently found in this section with the SVI IC language found in the 2009 Golf Course FOSET to properly address building modifications undertaken at all buildings within the SVI IC restriction area as shown in Attachment 5B (FOSET) and Exhibit 2B (CDR). EPA never agreed to singling out any individual buildings for application of the building modification component of the SVI IC. The text here indicates that only buildings 2753 and 2766 will get this restriction. That statement needs to be deleted.

c) Buildings 2763 and 2793 are discussed in several places in both the FOSET and CDR. As stated above, EPA did not single out for inclusion or exclusion from the SVI IC any of the 14 buildings in the SVI study. The text discussions indicate no further action was agreed to for these 2 buildings and that is not correct for these or any of the other 12 buildings in the SVI study. EPA agreed to no further investigation for a number of buildings; however, EPA did not agree to no further action for any of the 14 buildings in the SVI study (see especially page 8 of the CDR, 2nd paragraph of the FT-002 Groundwater OU discussion). EPA did not agree to no further action for soil vapors for buildings 2786, 2796, or 2797, and the text needs to be corrected to state that although no further investigation was required for those buildings, the SVI IC still applies to them (see also page 34 of the FOSET, section 5.10, Indoor Air Quality, same comment). The discussions below that paragraph (pages 8 through 10 of the CDR) also need to be corrected for buildings 2763 and 2793. The text states that no further action is recommended for these 2 buildings with respect to SVI. EPA does not agree with that recommendation, and has informed the Air Force of this on numerous occasions. Buidlings 2763 and 2793 need to have the building modification component of the SVI IC applied to them, and the statements that the SVI restriction will (only) apply to any new construction in the vicinity of these buildings need to be deleted. It was agreed to by EPA, NYSDEC, NYSDOH, and the Air Force during the months of discussions regarding the FT-002 Groundwater OU LUC/IC restriction boundaries that the SVI restriction would apply to all property and buildings in the SVI restriction area as shown in Attachment 5B and Exhibit 2B, with no buildings singled out for inclusion or exclusion with respect to building modifications. It is noted that while the text states that these 2 buildings will be subject to non-residential use restrictions, this is misleading, and this text should probably be deleted, as the entire SVI IC restriction area is also subject to a non-residential use IC restriction from the FT-002 Groundwater OU, as shown in Attachment 5B and Exhibit 2B. and as agreed to by EPA, NYSDEC, NYSDOH, and the Air Force during the months of discussions regarding the FT-002 Groundwater OU LUC/IC restriction boundaries. Corrections also need to be made to address these same issues on pages 34 to 36 of the FOSET (section 5.10, Indoor Air Quality).

2) The FOSET property itself has not been adequately delineated. This is crucial, as the exact property for which the AF is requesting a deferral from providing the CERCLA 120(h) covenant must be precisely delineated and described in the documents. It appears that the property that the AF is requesting the deferral for is that encompassed by the FT-002 Groundwater and SS-004 OUs, but this is not made clear in the documents. A map of the FT-002 Groundwater OU is provided in the documents, including its coordinates, but a map of SS-004 was not provided in the FOSET or CDR. A map with coordinates showing SS-004 and the associated area of ICs, as well as the IC language (similar to the other IRP sites) needs to be provided in the FOSET and CDR. Furthermore, the figures found in the FOSET do not provide a clear overlay of the FT-002 Groundwater or SS-004 OUs with the FOSET property, and the coordinates of the FOSET property itself were not originally provided. An overlay or other maps, to include legal descriptions, are needed so that the property within the FOSET boundaries for which the AF is requesting deferral of the covenant is clearly delineated, and the property within the FOSET property for which the Air Force is not requesting deferral of the CERCLA covenant is also clearly delineated. The figures submitted by the Air Force via email on March 10 and 14 partially address this issue, and it is hoped that this issue will be resolved during discussions between EPA and the Air Force tentatively planned for March 15.

; <u>Wendy Kuehner;</u>

Dave,

Thank you for the opportunity to review the draft documents, FOSET, CDR and SEBS, prepared for the Central Airfield portion of the former Plattsburgh AFB. The Department in conjunction with the NYSDOH has reviewed the documents and our prior concerns regarding the institutional control boundary for FT-002 have been resolved with the Air Force and the USEPA. We have no additional comments.

I would like to express my appreciation for the efforts of yourself and Bob Morse and all of those people who provide support to each of us in working diligently to resolve the issues surrounding a newly defined boundary for some of the institutional controls for FT-002.

Sincerely,

Daniel Eaton

From:	Daniel Eaton
To:	Morse.Bob@epamail.epa.gov; FARNSWORTH, DAVID S GS-13 USAF DoD AFCEE/EXC
Cc:	John Swartwout; Rich Fedigan; Wendy Kuehner; Don Hunt@URSCorp.com
Subject:	SVI language in the Central Airfield FOSET
Date:	Thursday, April 28, 2011 3:55:27 PM

Dave and Bob,

During the April BCT meeting the Air Force represented that the draft SVI language in the 2011 FOSET for the Central Airfield will remain the same. There was a comment on the draft SVI language requesting that the language be consistent with the SVI language in the 2009 FOSET for the Golf Course Industrial and Western Areas.

The NYSDEC and the NYSDOH concur with the USEPA comment that the language in the Central Air Field FOSET and CDR documents needs to remain the same as the language in the 2009 FOSET. The decision by the State to concur with the 2009 FOSET was based in part on commitments made in the 2009 FOSET and CDR. The protection offered by the institutional control for soil vapor intrusion is one of those commitments and is important to the State. Removing that protection in the Central Airfield FOSET is not an option.

Alterations to the boundary which the ICs would apply to was also proposed in the 2011 FOSET and the initial response by the DEC to this proposal was that the boundaries needed to remain the same as the 2009 FOSET. After careful review of the basis for the original boundary, the existing data for the area, and discussions with the Air Force and the USEPA, a revised IC boundary has been agreed upon. The protections provided in the SVI language included in the 2009 FOSET are not open for revision. The State cannot concur with a FOSET which does not contain the SVI language specified in the 2009 FOSET.

We remain available to discuss the issues or provide further information regarding this position if necessary.

With respect,

Dan

#### New York State Department of Environmental Conservation Division of Environmental Remediation

Remedial Bureau A, 11<sup>th</sup> Floor 625 Broadway, Albany, New York 12233-7015 **Phone:** (518) 402-9625 • **Fax:** (518) 402-9627 Website: <u>www.dec.ny.gov</u>



June 16, 2011

Mr. David Farnsworth AFCEE/EXE Plattsburgh 8 Colorado Street, Suite 121 Plattsburgh, NY 12903

Re:

Plattsburgh AFB, 510003 Final Central Airfield Finding of Suitability for Early Transfer (FOSET)

Dear Mr. Farnsworth:

The New York State Department of Environmental Conservation (Department) and the New York State Department of Health have reviewed the Final FOSET, CDR and SEBS for the Central Airfield public benefit conveyance submitted on June 03, 2011. The Department does not concur with the request for early transfer. The proposed institutional control for soil vapor intrusion does not fulfill the State's requirements as agreed to in the 2009 Golf Course, Industrial and Western Area FOSET and submitted to the Air Force in our November 23, 2010 response to the Air Force Tech Memo and in correspondence on April 28, 2011 responding to a question raised on the Central Airfield FOSET.

The Air Force June 03, 2011 transmittal letter states that "We cannot accept the recommendation to significantly expand the area subject to SVI restrictions." There has been no request to expand the area subject to SVI restrictions. The area to which the SVI restrictions apply is currently the boundary of the FT-002 GW operable unit. The Air Force has requested that the area subject to SVI restrictions be substantially reduced. No new technical information to support this request has been provided. The Air Force, the USEPA, and the Department worked diligently to develop the institutional control (IC) language and application of the SVI control during the implementation of the 2009 Golf Course, Industrial and Western Area FOSET. The IC for SVI was set in 2009 and applied to all of the property being transferred within the FT-002 GW operable unit boundary. It was our expectation that the same conditions apply to the property being considered for transfer in 2011. No new SVI data has been collected since the transfer of property in 2009.

In submission of the draft Central Airfield FOSET and documents for the FT-002 GW operable unit, the Air Force proposed a substantial reduction to the area subject to SVI



restrictions. In response, the Air Force, the USEPA and the Department worked together to refine the boundary of the area to which the SVI, groundwater use restrictions, and non residential use restrictions would apply. Based on a careful review of the available information and data, this revised boundary was agreed to on January 18, 2011. The new boundary was established using several criteria. We worked together to develop various interpretations of where the groundwater non-detect isopleth is and where a boundary based on that would be. In addition, some areas were included to meet administrative conditions set by RODs at other operable units where the groundwater issues were to be resolved in the FT-002 GW operable unit. The application of the three institutional controls, SVI, groundwater use, and no residential use are to be applied to the area within the revised boundary.

My November 16, 2010 memo conveyed the following: I believe that if we are to consider reducing the area the Land Use Controls would be applied to, the DEC could consider applying one boundary to the soil vapor restriction, the residential use restriction, and the groundwater use restriction. If the LUC boundary is to be reduced, we believe the non-detect boundary provides the most protective measure for potential exposures for all three restrictions and in particular the soil vapor intrusion restriction. When additional data for soil vapor and groundwater is available, the location of the LUC boundary could be reevaluated. We have no data to support a further reduction in the area to which the SVI restrictions would apply.

The USEPA offered revised SVI language on June 15, 2011. The Department has no disagreement with the proposed language. If the SVI language proposed by the USEPA is not used in the Central Airfield FOSET, then the language from the 2009 FOSET should be used.

Please feel free to contact me at 518-402-9563 or djeaton@gw.dec.state.ny.us if you have any questions.

Sincerely,

Daniel J. Eaton Division of Environmental Remediation

S. TerMaath, AFRPA R. Morse, USEPA J. Malleck, USEPA

cc:

From:	Morse.Bob@epamail.epa.gov
To:	FARNSWORTH, DAVID S GS-13 USAF DoD AFCEE/EXC
Cc:	djeaton@gw.dec.state.ny.us; Carpenter.Angela@epamail.epa.gov; Metz.Chloe@epamail.epa.gov;
	Smith.Lora@epamail.epa.gov; jbswartwo@gw.dec.state.ny.us; TERMAATH, STEPHEN G GS-15 USAF AFRPA
	<u>AFRPA/BPM; Doyle.James@epamail.epa.gov</u>
Subject:	EPA Comments on the "final" Central Airfield FOSET Documents
Date:	Thursday, June 16, 2011 11:23:35 PM
Attachments:	revised epa resp to af tech memo.pdf
	svi restriction 6-13#3.docx

#### Dave,

EPA has completed its review of the "final" Finding of Suitability for Early Transfer (FOSET) and Supplemental Environmental Baseline Survey (SEBS) for the Central Airfield Properties, submitted along with your transmittal letter dated June 3, 2011. EPA has not yet completed review of the "final" Covenant Deferral Request (CDR) for the Central Airfield Properties, and will provide any comments on the CDR as soon as our review is completed. EPA comments on the FOSET are presented below. Comments on the FOSET may also apply to the SEBS and CDR, and should be addressed accordingly.

1) Attachment 1F: This figure depicts the FT-002 / Industrial Area Groundwater Operable Unit (FT-002/IA Groundwater OU) and the land use control / institutional control (LUC/IC) restriction boundaries associated with it. This figure also provides the text of the six LUC/ICs currently proposed by the Air Force for the forthcoming FT-002 / IA Groundwater OU Record of Decision (ROD). As noted on page 10 of the FOSET, approximately 715 acres of land that are encompassed by the FT-002 / IA Groundwater OU lie within the FOSET property.

EPA stated in its March 15, 2011 comments on the draft final FOSET and CDR (Comment # 1) that neither the LUC/IC restriction boundaries nor the LU/IC language for the FT-002 / IA Groundwater OU found in the FOSET documents were acceptable to EPA with respect to soil vapor intrusion (SVI). Your transmittal letter indicates that the Air Force decided not to revise the FOSET documents to adress this comment, and review of the documents indicates that they have not been revised to address this comment. As stated by EPA personnel during the conference call held on June 15,2011 between the Air Force, EPA, NYSDEC, and NYSDOH, EPA's position on this issue has not changed. However, during the call, EPA proposed two changes to the FOSET documents that it hopes will enable our respective agencies to reach agreement on the FOSET documents. Those changes are discussed further below.

The SVI LUC/IC is designated number 6 in the figure, and the area of restriction for SVI proposed by the Air Force is shown in both solid and dashed green lines in the figure. EPA agrees with the LUC/IC restriction boundary for SVI as indicated by the solid green line. The dashed green line limits application of a portion of the SVI LUC/IC (future building modifications) to four exisitng buildings within the larger area of SVI LUC/IC restriction for the FT-002/IA Groundwater OU. It is this limitation in applying the building modification portion of the SVI LUC/IC to only these 4 exisiting buildings (2766, 2753, 2612, and NB-C) that EPA disagreed with previously, and for which it continues to disagree. Of the four buildings, only two are located within the Central Airfield FOSET property (2766 and 2753). EPA believes that the SVI LUC/IC should apply to all of the existing buildings located within the SVI LUC/IC restriction boundary. This includes 7 buildings investigated during the SVI studies that were conducted at the base, as well as approximately 19 buildings that were not included in the studies but that lie within the FT-002/IA Groundwater OU and the FOSET property. As pointed out in our March 15 comments, EPA had previously agreed that no further investigation was necessary at a number of the 7 buildings that were investigated, given their current use. However, as was also pointed out, EPA did not agree to no further action (NFA) for any of the buildings. The green dashed lines need to be removed from Attachement 1F.

SVI LUC/IC restriction boundaries were agreed to by the Air Force, EPA and New York State after months of discussions. A depiction of the boundaries ultimately agreed to was submitted to the regulatory agencies by the Air Force on January 18, 2011, and was approved by NYSDEC on January 26, 2011, and by EPA on February 1, 2011. The agreed-upon LUC/IC restriction boundaries represented a significant reduction to the original LUC/IC restriction boundaries first proposed by the Air Force for the FT-002/IA Groundwater OU. Limiting the application of the SVI LUC/IC to only certain

buildings, however, was never proposed by the Air Force during the months of previous discussions on the SVI LUC/IC restriction boundaries. The SVI LUC/IC restriction boundaries presented in the Central Airfield FOSET documents are not the same boundaries proposed by the Air Force on January 18, 2011, and the statement in Section 7 (Regulatory Coordination) of the FOSET that (the Air Force) agreed to the boundaries presented in the FOSET documents is meaningless. Neither EPA nor NYSDEC ever agreed to the SVI LUC/IC restriction boundaries presented in these FOSET documents.

Furthermore, during the entire time that discussions on reducing the SVI LUC/IC restriction boundaries were taking place, it was EPA's understanding that the SVI LUC/IC under consideration was the same SVI LUC/IC found in the Golf Course and Western Areas FOSET documents signed in July 2009. The Golf Course and Western Areas Properties also included property encompassed by the FT-002/IA Groundwater OU, and thus included a LUC/IC for SVI. Seven of the buildings investigated for SVI during the FT-002/IA Groundwater OU studies were located in the Golf Course and Western Areas Properties. The Air Force did not make clear during the months of discussions on reducing the SVI LUC/IC restriction boundaries that it intended to change the SVI LUC/IC language. The SVI LUC/IC language found in the draft final and "final" Central Airfield FOSET documents is not the same SVI LUC/IC language found in the Golf Course and Western Areas FOSET documents, yet they involve the same operable unit, the FT-002/IA Groundwater OU. The change in SVI LUC/IC language also in effect changed the SVI LUC/IC restriction boundaries, as the language currently found in Attachment 1F of the FOSET specifies that the building modification portion of the SVI LUC/IC only applies to four existing buildings in the FT-002/IA Groundwater OU (two existing buildings in the Central Airfield Property), rather than all 26 buildings in the Central Airfield property, as requested by EPA.

The following was taken from Section 7. Regulatory Coordination: "The Air Force does not agree with the USEPA position that all existing buildings within the restriction area should be subject to the restrictions due to the potential for SVI. No rationale or technical basis has been provided for restricting buildings that are not located over the areas of current, or historical groundwater contamination that exceeded regulatory standards." This statement is not correct. Rationale has been provided previously by EPA many times. The most significant recent submission of EPA's rationale for this was provided in our December 21, 2010 letter to you containing comments on the Air Force's November 2, 2010 Technical Memo on the FT-002/IA Groundwater OU LUC/IC Restriction Area. A complete copy of that letter is attached to this email. The following text, taken from that letter, discusses the area around New Building C (NB-C):

"The fact that PCE has not been detected in the groundwater wells located around NB-C in nearly 20 years but is present beneath the building's slab at concentrations warranting remediation demonstrates that using groundwater contaminant concentrations and cleanup standards alone may not be adequate for determining LUC/IC boundaries for SVI.

A number of other sites exist in New York State where groundwater contamination was at or below cleanup standards (or no contamination was detected at all), yet SVI sampling indicated a need for further investigation or mitigation. Because SVI is a "relatively new" pathway that is being evaluated, a correlated value for groundwater contamination and the potential for SVI concerns has not yet been developed. As such, when evaluating the level of groundwater contamination that could result in unacceptable health risks from SVI at Plattsburgh AFB, a more conservative approach (applying LUC/ICs based on an array of factors, including groundwater cleanup standards, contaminant concentrations in groundwater and soil, remedial progress, subslab concentrations, and other factors) is needed.

NYSDEC has provided the following examples of other sites in New York State where groundwater contamination was at or below cleanup standards, but where SVI sampling indicated that mitigation was necessary:

- Endicott NY (sites associated with the IBM properties). Many homes in this area required mitigation. There are homes in this area which were mitigated although groundwater in the area was at or below

maximum contaminant levels (MCLs).

- Long Island NY. Sites with groundwater contamination at or near cleanup standards required mitigation of homes for SVI.

- SCM Cortlandville. Many homes near this site have been mitigated for SVI, some as a direct result of evaluation via the NYSDOH matrix. At least one home required mitigation in an area where groundwater contamination was less than 5 parts per billion (ppb)."

EPA's rationale was also discussed during the June 15, 2011 conference call.

For vapor intrusion investigations, EPA utilizes a lines of evidence approach. Specifically, at the FT-002/IA Groundwater Operable Unit, we used the following lines of evidence: 1) while it has receded, widespread groundwater contamination existed in the area of the LUC/IC footprint historically and there could be residual contamination in the vadose zone, 2) buildings not directly above groundwater contamination still had high detections of VOCs in sub-slab samples (e.g. - building NB-C had the highest sub-slab PCE concentration and is located on the edge of the former TCE plume), and 3) groundwater in the area is shallow. All of these lines of evidence suggest that we are not confident of the exact source(s) of vapors in the subsurface and that the potential for migration into buildings may be high. This uncertainty or potential for risk is enough for the EPA to take an action (in this case, implementation of an IC). While the arbitrary distance of 100 feet from the nearest contaminated groundwater to a building may be used as a first step for evaluation of vapor intrusion, vapors behave in an unpredictable manner and follow preferential pathways which may not be easily determined.

Additionally, air handling system changes can have unexpected effects on vapor intrusion within a building; often times affecting different areas of a building differently. Only 14 of 38 buildings within the FT-002/IA Groundwater OU LUC/IC footprint were evaluated for SVI (7 of 26 in the Central Airfield FOSET property). The uncertainty surrounding current conditions as well as future conditions if building use should change or considerable modifications should occur is enough evidence to support inclusion of all current buildings in the SVI LUC/IC restriction area. It is important to note that all parties have agreed to the SVI LUC/IC as it applies to future construction of new buildings.

As mentioned above, EPA submitted proposed revised SVI LUC/IC language to you via email on June 15, 2011, and this language was provided to most if not all of the participants on the June 15, 2011 conference call. NYSDEC indicated its approval of EPA's proposed language via email on June 15, 2011. EPA's proposal language seeks to narrow the emphasis on changes in future conditions in the SVI LUC/IC restriction area from the broad category of physical building modifications to a narrower emphasis on conditions causing more intense uses by humans and/or conditions causing increased exposure. EPA's proposed language is as follows:

"With respect to risks that may be posed via indoor air contaminated by chemicals volatilizing from below the building slab ("vapor intrusion"), a grantee covenant will be included in the deed of any property within the identified groundwater restriction area which will require at least one of the following: (a) that (1) any construction of new buildings or (2) any change in the current use of existing buildings to a use which would increase the potential exposure of its users to vapor intrusion (i.e. "up zoning") shall necessitate mitigation of any unacceptable risk (as that risk is determined under CERCLA and the NCP); or (b) that an evaluation of the potential for unacceptable risk associated with vapor intrusion must occur prior to any construction of new buildings or any up zoning in the current use of existing buildings, and if an unacceptable risk under CERCLA and the NCP associated with vapor intrusion is posed, mitigation of the vapor intrusion shall be included in the design/construction of the structure prior to occupancy or implemented prior to the change in use. Any such mitigation or evaluations will be coordinated with the USEPA and NYSDEC."

2) Page 10, FT-002/IA Groundwater OU: The text states that "the final remedy for the FT-002/IA GW

OU includes: ...". "Includes" needs to be changed to "is expected to include". Also, the prohibition on residential property development and residential land use is missing from the discussion and needs to be added. Add "and changes in land and/or building use" after "for future construction". Add "and the potential for health risks from soil vapor intrusion" after "to address sub surface soil gas contamination".

3) During the June 15, 2011 conference call, EPA staff shared an additional proposal with the parties in attendance, namely the concept of "temporary ICs" that would be removed or replaced upon signature on the FT-002/IA Groundwater OU ROD. It is hoped that such ICs could be utilized in the FOSET documents and transfer deed(s) to assuage concerns the Air Force may have concerning encumbrances placed upon the property related to the SVI LUC/IC. EPA attorney Jim Doyle spoke with AFRPA attorney Carolyn White today via telephone regarding this concept, and Ms. White has indicated that it is a concept worth investigating and worthy of further discussion. It was requested during the June 15 conference call that a more thorough explanation of the "temporary IC" concept be provided, and we suggest that this topic be explained by our respective attorneys during our next conference call on the FOSET documents, and that it be evaluated as thoroughly as possible by those in attendance.

-- END OF COMMENTS --

If you have any questions regarding these comments, please let me know. Please let me know when you are ready to schedule the next conference call regarding the FOSET documents. Thank you.

Bob

#### FARNSWORTH, DAVID S GS-13 USAF DoD AFCEE/EXC

From:	Bob Morse [Morse.Bob@epamail.epa.gov]
Sent:	Thursday, June 30, 2011 10:31 PM
То:	FARNSWORTH, DAVID S GS-13 USAF DoD AFCEE/EXC
Cc:	djeaton@gw.dec.state.ny.us; James Doyle; Angela Carpenter; John Malleck; Chloe Metz; Lora Smith; jbswarto@gw.dec.state.ny.us; Wendy S. Kuehner; TERMAATH, STEPHEN G GS-15 USAF AFRPA AFRPA/BPM
Subject:	EPA Comments on the "Final" Central Airfield Property CDR and FOSET
Attachments:	063011 com cdr.docx

Dave,

EPA has completed its review of the "Final" Central Airfield Property Covenant Deferral Request (CDR). EPA's comments on the CDR are attached. Additional comments on the Finding of Suitability for Early Transfer (FOSET) were developed during our review of the CDR, and are also included in the attachment. The additional comments on the FOSET supplement comments submitted to you by EPA on June 16, 2011. Please note that explanations for some of EPA's comments are provided in the right hand margin of the document in a "comment" format. Please let me know if the explanations do not appear or are illegible.

If you have any questions regarding the attached comments, please let me know. I look forward to hearing from you regarding the scheduling of the next conference call to discuss the FOSET documents, and the language proposed by EPA for the FT-002/IA Groundwater OU Soil Vapor Intrusion (SVI) Land Use Control / Institutional Control (LUC/IC). Have a great Fourth of July weekend!

Bob

#### EPA Comments on the "Final" Central Airfield Property Covenant Deferral Request (CDR)

Page 6, Section 3.2, 1<sup>st</sup> paragraph: Delete this paragraph and replace with the following:

"There are ten CERCLA Installation Restoration Program (IRP) sites located on portions of the Property as shown in Exhibits 1A and 1B. Not all remedial actions have been taken at two of these sites: the Fire Training Area (FT-002)/Industrial Groundwater OU, and the SS-004 Flightline Area Soil OU; it is for these sites that the Air Force requests a deferral of the CERCLA 120(h)(3)(ii)(I) covenant, as is allowed pursuant to CERCLA 120(h)(3)(C)(i) because it is premature to warrant that all remedial action has been taken. These two sites are discussed in more detail below. The other eight sites include four which require no further action (SD-001, SS-017 Soil OU, SS-027, and SS-029 Soil OU) and three where the only remaining necessary action is placing certain restrictions on the relevant portions of the Property, restrictions which it turns out are identical to and included within the restrictions to be placed on the Property as a whole because of other site concerns. These three are SS-005 Soil OU, SS-006 Soil OU, and LF-023. In essence, all remedial action will have been taken with regard to these three sites upon placement of the restrictions in the deed at the time of transfer. The last site of the ten referred to above is the FT-002 Source Area OU. The Air Force believes this site has been fully remediated, but it has yet to seek formal regulatory concurrence of that completion. These other sites (other than the Fire Training Area (FT-002)/Industrial Groundwater OU, and the SS-004 Flightline Area Soil OU) are discussed in more detail in Section 5 of the Finding of Suitability for Early Transfer (FOSET) for the Central Air Field area."

#### Page 7, Section 3.2, FT-002/IA Groundwater OU:

The CDR only includes discussion of four buildings located on the FOSET property that were investigated for SVI during the FT-002 SVI studies (buildings 2753, 2763, 2766, and 2793). Three other buildings located on the FOSET property (2786, 2796, and 2797) were also investigated during the FT-002 SVI studies, and discussions similar to those for the other four buildings need to be added to the CDR for buildings 2786, 2796, and 2797. Furthermore, as pointed out in EPA's March 15 comments on the draft final FOSET documents, EPA had previously agreed that no further investigation was necessary for 5 of the 7 buildings located on the FOSET property that had been investigated during the SVI studies, given their current use (i.e., buildings 2763, 2793, 2786, 2796, and 2797). However, as was also pointed out, EPA did not agree to no further action (NFA) for these five buildings or any of the seven buildings investigated during the SVI studies that are located on the FOSET property. The discussions in the CDR for Buildings 2763 and 2793 state that no further action was recommended for these two buildings. EPA does not agree with these recommendations, and this needs to be stated in the CDR, or the statements need to be removed. EPA believes that the SVI LUC/IC should apply to all of the existing buildings located within the SVI LUC/IC restriction boundary. This includes all 7 buildings located on the FOSET property that were investigated during the FT-002 SVI studies, as well as approximately 19 buildings that were not included in the studies, but that lie within the FT-002/IA Groundwater OU and are located on the FOSET property. Also, for buildings 2763 and 2793, the remainders of the sentences at the end of the discussions (regarding non-residential use and SVI restrictions), following the NFA recommendations, need to be deleted. The entire FT-002/IA LUC/IC restriction area is subject to a residential use restriction, and the SVI IC applies to construction of any new buildings located within the FT-002 LUC/IC restriction area, not just the areas in the immediate vicinities of these two buildings. The CDR needs to be revised to reflect all the above comments for this section. Section 5.10 on pages 34 and 35 of the FOSET also needs to be revised in accordance with these comments.

Page 8, Building 2766, last 2 sentences: These sentences need to be joined and revised slightly. Change "... contamination is recommended. The" to "contamination **was** recommended, **and a** soil vapor extraction system has been..." etc.

Page 9, 2<sup>nd</sup> full paragraph: The IC prohibiting residential use is missing and needs to be added. Also, add "and future changes in building use for existing buildings and any new buildings constructed" after "... vapor intrusion for future construction".

Page 11, Section 5, last sentence: "exhibits 2" should be "Exhibit 2".

Page 12, Section 8.1.4: As stated in EPA's March 15, 2011 comments on the draft final FOSET and our June 16, 2011 email comments on the "final" FOSET, EPA does not agree with the SVI IC restriction language or the boundaries for the SVI IC for the FT-002/IA Groundwater OU as presented in the CDR or FOSET. This includes limitation of the future change in building use component of the SVI IC to only 2 buildings within the restriction area. This section needs to be deleted and replaced with either the new SVI IC language proposed by EPA in its June 16, 2011 comments, or with the SVI IC language for FT-002 found in the final 2009 Golf Course FOSET.

Page 13, Section 8.1.5: "Exhibits 2" should be "Exhibit 2".

Page 13, Section 8.1.7: Change "or" to "and".

Page 13, Section 8.1.9 a): Add "on or" between "has been taken" and "before the date of the deed". Also, in the 5<sup>th</sup> line, change "120(h)(3)(A)(i)(I)" to "120(h)(3)(A)(ii)(I).

Page 15, Section 8.2.3 b), 1<sup>st</sup> paragraph: Exhibits 2A through 2F are no longer attached to the CDR. Please provide an appropriate reference to figures depicting Sites FT-002, SS-005, SS-006, LF-023, and the Mobil Gas Station Plume Area.

Pages 16 and 17, Sections 9.3 and 9.4: Please make the following changes:

9.3 The covenant required by CERCLA 120(h)(3)(A)(ii)(I) will be deferred only with respect to Sites FT-002 and SS-004. The covenant required by CERCLA 120(h)(3)(A)(ii)(II) will be included in the Deed for non-deferred portions of the Property-to ensure protection of human health and the environment and to ensure that environmental investigations and remedial activities will not be disrupted. A clause will be included in the Deed granting the United States access to <u>any portion of</u> the Property in any case where CERCLA remedial action or corrective action is <u>found to be</u> necessary in the event that such an <u>action is found to be necessary</u> after transfer. When all response action necessary to protect human health and the environmental has been taken, the Transferee will receive a warranty pursuant to CERCLA § (120(h)(3)(C)(iii) that satisfies the requirement of CERCLA § 120(h)(3)(A)(ii)(I).

9.4 Based on the findings stated above and in the Finding of Suitability for Early Transfer, for the Central Airfield Area, it is requested that the United States Environmental Protection Agency, with concurrence of the State of New York, defer the requirements of CERCLA 120(h)(3)(a)(ii)(I) with respect to the Property CERCLA Sites FT-002 Fire Training Area/Industrial Area Groundwater OU and SS-004 Flightline Soil OU, that all response actions have been taken before transfer.

Comment [Jd1]: First, the (A)(ii)(II) covenant should be made with regard to the early transferred property, or the "Property". Second, it is not clear how a promise, by itself, to come back and address contamination left behind ensures protection of HH&E or ensures against disruption of remedial activities. Lastly, as written, when you are referring to a deed to other, non-deferred areas, you mean a different deed from this "Deed", right? Not the "Deed" (to the requested deferred properties) which is referenced throughout the CDR?

**Comment [Jd2]:** As written, it sounds like the clause referred to in this sentence would be included if and when addl work "is found to be necessary after transfer." Clearly what is meant is that the clause will be put in the deed now (pre-transfer) conditioning such a future right to access on the future determination that addl work is necessary. Hence the change.

Comment [Jd3]: Is the "Central Airfield Area" the precise, defined term for the area we are seeking a deferral of the (A)(ii)(I) covenant? How about "the Property" Isn't this more precise? Exhibit 2: Please place the word "restrictions" in the description in the "key" for what the solid green and red bordered boxes indicate (it is included in the green broken line description).

#### ADDITIONAL EPA COMMENTS ON THE "FINAL" CENTRAL AIRFIELD PROPERTY FINDING OF SUITABILITY FOR EARLY TRANSFER (FOSET)

Page 21, section 5.4, third line: "this property" should be "the Property".

Page 24, section 5.6, second line: "this property" should be "the Property".

Page 28, section 5.7, third line: "this property" should be "the Property".

Page 32, last sentence on the page: Please replace "...Air Force will not be responsible..." with "...Transferee is required...".

Page 33, second full paragraph, second line: Please replace "...responsible for complying..." with "...required to comply..." and in the fifth line insert "which have been" between "substances" and "released"

Page 35, first line: The last 2 sentences of this paragraph need to be joined and revised slightly. Change "... contamination is recommended. The" to "contamination **was** recommended, **and a** soil vapor extraction system has been..." etc.

Page 39, Section 8, 1<sup>st</sup> paragraph, next to last sentence: Change "disclosures as **addressed** above" to "disclosures as **described** above".

Page 39, Section 8, 2<sup>nd</sup> paragraph, 5<sup>th</sup> sentence: Delete "non-deferred portions of".

8March2012 USEPA email response to the CA FOSET.txt To: dave.farnsworth@afrpa.pentagon.af.mil (Dave Farnsworth) From: Bob Morse/R2/USEPA/US Date: 03/08/2012 05:59PM

Cc: dj eaton@gw. dec. state. ny. us, Angel a Carpenter/R2/USEPA/US@EPA, James Doyl e/R2/USEPA/US@EPA, John Malleck/R2/USEPA/US, Lora Smith/R2/USEPA/US@EPA, Chloe Metz/R2/USEPA/US

Subject: Plattsburgh AFB Central Airfield FOSET, CDR, and SEBS

Dave,

EPA has reviewed the Plattsburgh AFB Central Airfield Area Finding of Suitability for Early Transfer (FOSET), Covenant Deferral Request (CDR), and Supplemental Environmental Baseline Survey (SEBS), transmitted electronically on February 17, 2012, and received by EPA in hard copy on February 21, 2012. Although previous EPA comments have been adequately addressed in the documents, incorporation of the additional comments presented below will help provide clarity to the final documents.

We have begun drafting a Findings Statement for EPA Region 2's Regional Administrator regarding the early transfer of the Central Airfield Area property, and will be circulating the draft Findings Statement for comment. We will be recommending that the Regional Administrator sign the Findings Statement, conditioned upon EPA review of the draft deed for the property. Please submit the pertinent portions of the draft deed for our review at your earliest possible convenience. Thank you.

Additional EPA Comments on the CDR:

1. Page 7, Section 3.2: In the last sentence of the 2nd paragraph of the section on the FT-002/(IA) Groundwater OU, to make it clear that the seven buildings discussed immediately following that paragraph are in fact part of the FT-002/(IA) Groundwater OU, and not separate CERCLA IRP sites, it would help to insert "of the following buildings in the FT-002/ IA Groundwater OU" between "investigation" and "are".

2. Page 9, 1st sentence of the paragraph immediately following the paragraph on Building 2797: To provide clarity regarding which buildings will be restricted, replace "These facilities to include facilities" with "The seven buildings discussed above are among other facilities located", and replace "are" with "that will be".

3. Page 14, Section 8.1.9 a), and page 17, Section 9.3: references to section 120(h)(3)(A)(ii) and (B) of CERCLA pertaining to There are warranties of the United States that all necessary remedial action has been or will be taken. However, 120(h)(3)(B) is not a warranty, but merely a definitional clarification of what is meant by "all remedial action necessary" in 120(h)(3)(A)(ii), and thus "and (B)" is not necessary or accurate in those three places (twice in 8.1.9 a) and once in 9.3), and should be removed.

4. Page 14, Section 8.2: The title of this section states that the assurances shall be included in the "deed or transaction documents", and yet the 120(h)(3)(A)(ii)(II) covenant described in Section 8.2.1 is required by CERCLA to be in the deed, and cannot be in transaction documents (as distinguished from the assurances in sections 8.2.2 and 8.2.3, which can be either in the deed or transaction documents). A "in the deed" after "Assurance" in section 8.2.1. A simple fix would be to add

Additional EPA Comments on the FOSET:

8March2012 USEPA email response to the CA FOSET.txt Page 38, 1st full paragraph, 1st sentence: As mentioned above in CDR comment #2, replace "These facilities to include facilities" with "The seven buildings discussed above are among other facilities located", and replace "are" with "that will be".

Page 42, Section 8: Delete "and (B)" in "120(h)(3)(A)(ii) and (B)" as stated above in CDR comment # 3.

END OF COMMENTS --

We look forward to assisting the Air Force in the cleanup and return of the remaining property at the former Plattsburgh Air Force Base to the community for reuse. Please let me know if you have any questions regarding this e-mail. Thank you.

Bob

New York State Department of Environmental Conservation Division of Environmental Remediation

Remedial Bureau A, 11<sup>th</sup> Floor 625 Broadway, Albany, New York 12233-7015 **Phone:** (518) 402-9625 • **Fax:** (518) 402-9627 Website: www.dec.ny.gov



March 19, 2012

Mr. David Farnsworth *AFCEE/EXE* Plattsburgh 8 Colorado Street, Suite 121 Plattsburgh, NY 12903

Re:

Plattsburgh AFB, 510003 Final Central Airfield Finding of Suitability for Early Transfer (FOSET)

Dear Mr. Farnsworth:

The New York State Department of Environmental Conservation (Department) and the New York State Department of Health have reviewed the Final FOSET, CDR and SEBS for the Central Airfield public benefit conveyance submitted on 17 February, 2012. The comments submitted by the Department have been addressed in this version of these documents. The primary comments submitted were focused on the boundaries established for the application of several institutional controls and the language to be used to apply the institutional control to address soil vapor intrusion. The institutional boundaries presented on attachments 1A-2 and 1A-3 of the FOSET are approved by the Department. The institutional control language to address soil vapor intrusion presented on attachment 1F-1 of the FOSET is also approved by the Department.

During the completion of the 2009 Golf Course, Industrial, and Western Areas Properties FOSET, the Air Force had provided the Department a 14 May, 2009 letter which stipulated the Air Force commitments for Access, Remedial Elements, Annual Reporting, and Forwarding Landowner Reports on Institutional Controls. This letter specifically references the properties transferred to PARC under the economic benefit conveyance. The Department believes the same commitments would apply to the public benefit conveyance and requests the Air Force provide a letter to confirm.

Thank you for the opportunity to review the Final FOSET, Final CDR and Final SEBS.

Sincerely,

Daniel J. Eaton Engineering Geologist

ecc: R. Morse, USEPA J. Swartwout W. Kuehner



#### FORMER PLATTSBURGH AIR FORCE BASE FINDING OF SUITIBILITY FOR EARLY TRANSFER (FOSET) CENTRAL AIRFIELD AREA RSPONSE TO REGULATORY COMMENTS

- 1. The NYSDEC provided comments on July 2<sup>nd</sup>, 2010 to the Draft FOSET which is shown at Attachment 5A. The NYSDEC disagreed with the size of the area proposed by the Air Force for the FT002/Industrial Area (IA) Groundwater Operable Unit (OU) Institutional Controls (ICs) created to address the potential for soil vapor intrusion (SVI). The Air Force met with the NYSDEC and USEPA on several occasions from July 30<sup>th</sup>, 2010 through January 18<sup>th</sup>, 2011 and agreed to the boundaries for the soil vapor intrusion (SVI), groundwater, and non-residential use restriction. The area of restrictions agreed upon is shown at Attachment 1F in the Final FOSET.
- 2. The USEPA declined to comment on the Draft FOSET Documents (the USEPA response is shown at Attachment 5B) due to technical issues associated with the IRP Site FT002/IA Groundwater OU Proposed Plan and Record of Decision. The Air Force met with the NYSDEC and USEPA on several occasions from July 30<sup>th</sup>, 2010 through January 18<sup>th</sup>, 2011 and agreed to the boundaries for the SVI, groundwater, and non-residential use restriction. The area of restrictions agreed upon is shown at Attachment 1F in the Final FOSET. The Air Force is continuing to work with the NYSDEC and USEPA on the other remaining technical issues and comments on the FT002/IA Groundwater OU Proposed Plan.
- 3. The USEPA provided comments, on March 15<sup>th</sup>, 2011, to the Draft Final FOSET (the USEPA comments are shown at Attachment 5C). The USEPA comments are addressed as follows:
  - a. General Comment #1, Applicability of the FT002/IA Groundwater OU SVI restriction to all existing buildings within the SVI, groundwater, and non-residential use restriction area: The Air Force does not agree with the USEPA position that all existing buildings within the restriction area should be subject to the restrictions on building modification or use due to the potential for SVI. No rationale or technical basis has been provided for restricting buildings that are not located over the areas of current or historical groundwater contamination. In addition, the Air Force does not understand what justification may exist for restricting buildings located over areas that previously had groundwater contamination, but were sampled and showed no unacceptable risk with respect to a potential SVI pathway. With respect to the four buildings (Buildings 2753, 2763, and 2766 are within the area of this FOSET and CDR; New Building "C" is within the portion of the site that was evaluated and approved under a separate FOSET and CDR in 2009), the Air Force has determined that potential SVI is likely associated with contaminate spills under the buildings that warrant remedial actions and interim SVI restriction pending remediation. The FT002 SVI restriction language has not been revised.
  - b. General Comment #1b, New Building C and inconsistencies between the FT002 restrictions and what is discussed in the FOSET and CDR: New Building C is not

located within the boundaries of this FOSET. Portions of the FT002/Industrial Area Groundwater Operable Unit, including New Building C, have already been evaluated in the 2009 FOSET for the Golf Course, Industrial, and Western Areas. The entire FT002 site is shown in the FOSET attachments and CDR exhibits to inform the reader of the full extent of the site. However, only the portion of the site that is within the boundaries of this FOSET is discussed within this FOSET and the CDR. The location/site maps have been revised and additional text has been added to clarify that not all of the FT002 site is within the boundaries of this FOSET.

- c. General Comment #1b, CDR Section 8.1.5: See item 3a above.
- d. General Comment #1c, Applicability of SVI restrictions to Buildings 2763, 2786, 2793, 2796, and 2797: The no further action recommendation, with respect to SVI, for Buildings 2763 and 2793 is based on multiple rounds of sampling. The no further action recommendation, with respect to SVI, for Buildings 2786, 2796 and 2797, is based on sampling and was agreed to by the USEPA at the 19 December 2007 meeting between the Air Force, the USEPA, the NYSDEC and the New York State Department of Health. As indicated in item "3a" above, no rational or technical basis for restricting these buildings has been provided. No changes have been made to FT002 restriction language, or the FOSET and CDR text.
- e. General Comment #2, delineation of the FOSET property: The FOSET location plan drawings have been revised to show the location of the FT002/IA Groundwater OU boundaries and SS004 Soil OU boundaries relative to the FOSET boundaries; a legal description of the FOSET boundaries is included on the revised location Plan. In addition, all property not located within the FT002/IA Groundwater OU or the SS004 Soil OU (the two sites requiring deferral of the CERCLA Covenant) has been removed from this FOSET, evaluated under a Finding of Suitability for Transfer (FOST) and submitted for regulatory review.
- f. CDR Comment #1, Page 14, Section 4, discussion of future use limitations: Text has been revised.
- g. CDR Comment #2, Page 14, Section 5, Risk Analysis discussion: Text has been revised.
- h. CDR Comment #3, Page 14, Section 6, 1<sup>st</sup> sentence, discussion of closed out sites: The reference to sites that have been closed out has been deleted. All IRP sites that are discussed in the CDR are located within or partially within, the area that require a deferral of the CERCLA covenant; however only two sites require the deferral: the FT002/IA Groundwater OU and the SS004 Soil OU. For Clarity purposes, the discussion of the IRP sites in Sections 3 of the CDR has been sub divided into separate sub sections for sites requiring the deferral (Section 3.2.1) and sites not requiring the deferral (Section 3.2.2); In addition, discussion of IRP sites not requiring deferral has been deleted from Sections 6 and 8.
- i. CDR Comment #4, Page 17, Section 8.1.3: Yes, approval of groundwater discharge is required from the NYSDEC only.
- j. CDR Comment #5, Page 18, Section 8.1.9: Additional text has been added.
- k. CDR Comment #6, Page 18, Section 8.1.11: Text appears ok as written.

- 1. CDR Comment #7, Page 18, Section 8.2.1: Text appears ok as written.
- m. CDR Comment #8, Page 21, Section 8.2.3d), discussion of Budgeting for Response Actions: Text has been revised.
- n. CDR Comment #9, Pages 21 and 22, Section 9, discussion of Finding of Suitability for Early Transfer: Revisions have been made to each of the four sub sections.
- o. FOSET Comment #1, Page 10, Section 5.2.1, discussion/description of IRP Sites within the FOSET Area: The FOSET diagram/map has been revised to show the entire parcel and all associated or adjacent IRP sites on a single drawing. In addition the text for each IRP site has been updated to include the size of the site, the location relative to the Property, and if the respective site is within or partially within this Property.
- p. FOSET Comment #2, Page 15, Section 5.2.2, discussion of IRP sites adjacent to the FOSET Area: The intent of this section is to provide information regarding IRPs located near this Property so as to assure the reader that the Property is not being impacted from adjacent sites. Additional text has been added indicating that none of these adjacent sites impact the Property.
- q. FOSET Comment #3, Page 16, discussion of IRP Site SS-013: An Operating Properly and Successfully (OPS) Determination for IRP Site SS-013 has not been prepared. IRP Site SS-013 is located on adjacent property and is discussed in this FOSET for information purposes, per item "p" above. IRP Site SS-013 was evaluated in the January 2009 FOSET for the Golf Course, Industrial, and Western Area. A CERCLA Covenant Deferral with respect to IRP Site SS-013 was requested in January 2009 and approved in July 2009.
- r. FOSET Comment #4, Page 17, discussion of IRP Site SS-041: IRP Site SS-041 is located on adjacent property and is discussed in this FOSET for informational purposes as per item "p" above. IRP Site SS-041 was evaluated in the January 2009 FOSET for the Golf Course, Industrial, and Western Area. A CERCLA Covenant Deferral with respect to IRP Site SS-041 was requested in January 2009 and approved in July 2009.
- s. FOSET Comment #5, Pages 18, 19, and 21, Sections 5.3.1, 5.3.2, and 5.3.3: Additional text has been added to each section.
- t. FOSET Comment #6, Page 20, discussion of petroleum spill site OTH-3240 (Pumphouse #3): Text has been revised to clarify that remaining remedial activities for this petroleum spill site are being performed as part of the FT002/IA Groundwater OU.
- u. FOSET Comment #7, Page 34, Restriction language for asbestos-containing materials: Text has been revised and added.
- v. FOSET Comment #8, Pages 40 and 41, Section 8, Finding of Suitability for Early Transfer: Text has been revised throughout this section.
- 4. The NYSDEC provided comment, on March 3<sup>rd</sup>, 2011, to the Draft Final FOSET (shown at Attachment 5D) indicating that prior concerns regarding the institutional control boundary for FT-002 have been resolved and there were no additional comments. However, on April 28<sup>th</sup>, 2011, the NYSDEC indicated (shown in Attachment 5E) agreement with the USEPA comment regarding the FT002/IA Groundwater OU SVI restriction (see item 3a above). As indicated in 3a above, the Air Force does not agree with the USEPA/NYSDEC position

regarding the applicability of the SVI restriction to all buildings within the restriction area. The FT002 SVI restriction language has not been revised.

5. The NYSDEC provided comments on June 16th, 2011 to the Final FOSET (shown at Attachment 5F). The NYSDEC indicated it does not concur with the request for early transfer because the proposed institutional control for soil vapor intrusion does not fulfill the State's requirements (see 1<sup>st</sup> paragraph of NYSDEC letter). In the 2<sup>nd</sup> to last paragraph on page two of their letter, NYSDEC states that the non-detect boundary provides the most protective measure for potential exposures to the soil vapor intrusion restriction, and that the LUC boundary could be reevaluated when additional soil vapor and groundwater data is available. In the last paragraph NYSDEC indicates it may accept the revised SVI language offered by the USEPA on June 15th, 2011.

<u>Air Force Response</u>: The soil vapor intrusion restriction boundaries presented in the SEBS, FOSET, and CDR have been revised to reflect the boundaries recently agreed to by the Air Force, NYSDEC and USEPA representatives at their 11 and 19 January 2012 meetings.

- 6. The USEPA provided comment, on June 16th, 2011, to the Final FOSET and SEBS (shown at Attachment 5G). The USEPA comments and Air Force responses are presented below:
  - a. Comment 1, FOSET Attachment 1F. The USEPA proposes alternative soil vapor intrusion restriction language:

"With respect to risks that may be posed via indoor air contaminated by chemicals volatilizing from below the building slab ("vapor intrusion"), a grantee covenant will be included in the deed of any property within the identified groundwater restriction area which will require at least one of the following: (a) that (1) any construction of new buildings or (2) any change in the current use of existing buildings to a use which would increase the potential exposure of its users to vapor intrusion (i.e. "up zoning") shall necessitate mitigation of any unacceptable risk (as that risk is determined under CERCLA and the NCP); or (b) that an evaluation of the potential for unacceptable risk associated with vapor intrusion must occur prior to any construction of new buildings or any up zoning in the current use of existing buildings, and if an unacceptable risk under CERCLA and the NCP associated with vapor intrusion is posed, mitigation of the vapor intrusion shall be included in the design/construction of the structure prior to occupancy or implemented prior to the change in use. Any such mitigation or evaluations will be coordinated with the USEPA and NYSDEC."

<u>Air Force Response</u>: The soil vapor intrusion restriction boundaries presented in the SEBS, FOSET, and CDR, have been revised to reflect the boundaries recently agreed to by the Air Force, NYSDEC and USEPA representatives at their 11 and 19 January 2012 meetings.

b. Comment 2, FOSET Page 10. Addition of text to the IRP Site FT-002/IA Groundwater OU discussion.

Air Force Response: The text has been revised as requested.

c. Comment 3, Use of temporary institutional controls.

<u>Air Force Response:</u> We had discussed the possibility of interim conservative measures limiting building use (related to the potential for SVI) pending remedy selection in the

final FT-002 ROD, not as an interim remedy but as an interim management tool to allow early transfer. However, based on the recent agreement on the SVI restriction and the likely submission of the final FT002/Industrial Area Groundwater OU ROD within the next year, temporary institutional controls do not appear necessary.

- 7. The USEPA provided comment on June 30th, 2011 to the Final CDR and additional comments to the FOSET (shown at Attachment 5H). The USEPA comments and Air Force Responses are presented below:
  - a. CDR Page 6, Section 3.2, replace introductory paragraph with USEPA suggested text.

Air Force Response: The Air Force recommends the following instead:

"There are ten CERCLA Installation Restoration Program (IRP) sites located on portions of the Property as shown in Exhibits 1A and 1B. Not all remedial actions have been taken at two of these sites: the Fire Training Area (FT-002)/Industrial Area (IA) Groundwater OU, and the SS-004 Flightline Area Soil OU; it is for these sites that the Air Force requests a deferral of the CERCLA 120(h)(3)(ii)(I) covenant as allowed pursuant to CERCLA 120(h)(3)(C)(i). These two sites are discussed in more detail below. The other eight sites include four that require no further action (SD-001, SS-017 Soil OU, SS-027, and SS-029 Soil OU) and three where the only remaining necessary action is placing certain restrictions on the relevant portions of the Property. These three are SS-005 Soil OU, SS-006 Soil OU, and LF-023. In essence, all remedial action will have been taken with regard to these three sites upon placement of the restrictions in the deed at the time of transfer. The last site of the ten referred to above is the FT-002 Source Area OU (which is different from the Fire Training Area (FT-002)/IA Groundwater OU). The Air Force believes this site has been fully remediated and has requested regulatory concurrence for that completion; it is preparing additional information as requested by the regulators. These other sites (other than the Fire Training Area (FT-002)/IA Groundwater OU, and the SS-004 Flightline Area Soil OU) are discussed in more detail in Section 5 of the Finding of Suitability for Early Transfer (FOSET) for the Central Air Field Area."

b. CDR Page 7, Section 3.2, (and FOSET pages 34 and 35, Section 5.10)

<u>Air Force Response</u>: Text has been revised/expanded as requested. Discussion of the SVI restriction has been revised to reflect the restrictions that have been recently agreed upon.

c. CDR Page 8, Building 2766, last two sentences.

Air Force Response: Text has been revised as requested.

d. CDR Page 9, 2<sup>nd</sup> full paragraph.

<u>Air Force Response:</u> Text has been revised as requested. Discussion of the SVI restriction has been revised to reflect the recently agreed to restriction.

e. CDR Page 11, Section 5, last sentence.

<u>Air Force Response:</u> Text has been revised as requested.

f. CDR Page 12, Section 8.1.4.

<u>Air Force Response:</u> Discussion of the SVI restriction has been revised to reflect the restriction language recently agreed upon.

g. CDR Page 13, Sections 8.1.5, 8.1.7, and 8.1.9.

<u>Air Force Response</u>: Text has been revised as requested for 8.1.5 and 8.1.7. The 8.1.9(a) change (reference to the CERCLA section) needs to remain as 120(h)(3)(A)(i)(I) because the reference is to the notice of hazardous substances (and not to the warranty, which is the (A)(ii) section).

h. CDR Page 15, Section 8.2.3b), 1<sup>st</sup> Paragraph.

Air Force Response: Text has been revised.

i. CDR Pages 16 and 17, Sections 9.3 and 9.4.

<u>Air Force Response:</u> The USEPA and the Air Force counsels have agreed upon the following language:

(Section 9.3) The covenant required by CERCLA(h)(3)(A)(ii)(I) will be deferred only with respect to Sites FT-002 Fire Training Area/IA Groundwater OU and SS-004 Flightline Area Soil OU. Pursuant to section 120(h)(3)(A)(ii)(II) and (B) of CERCLA, the United States warrants that any additional remedial action found to be necessary for the transferred Property after the date of the deed shall be conducted by the United States. A clause will be included in the deed granting the United States access to any portion of the Property in the event that CERCLA remedial action is necessary after transfer. When all response action necessary to protect human health and the environment has been taken, the transferee will receive a warranty pursuant to CERCLA 120(h)(3)(C)(iii) that satisfies the requirement of CERCLA 120(h)(3)(ii)(I).

(Section 9.4) Based on the findings stated above and in the Finding of Suitability for Early Transfer, it is requested that the United States Environmental Protection Agency, with concurrence of the State of New York, defer the requirements of CERCLA 120(h)(3)(a)(ii)(I) with respect to the property associated with CERCLA Sites FT-002 Fire Training Area/Industrial Area Groundwater OU and SS-004 Flightline Area Soil OU, that all response actions have been taken before transfer."

j. CDR Exhibit 2 (and FOSET Attachment 1F).

<u>Air Force Response:</u> The Exhibit and Attachment have been revised per the recent SVI restriction agreement.

k. FOSET Page 21, Section 5.4.

Air Force Response: Text has been revised as requested.

1. FOSET Page 24, Section 5.6.

<u>Air Force Response:</u> Text has been revised as requested.

m. FOSET Page 28, Section 5.7.

Air Force Response: Text has been revised as requested.

n. FOSET Page 32, last sentence.

<u>Air Force Response</u>: The original text is an accurate description of the deed language normally used by AFRPA; it puts the Transferee on notice that the Air Force will not be responsible as well as requiring the Transferee to comply. No change.

o. FOSET Page 33, 2<sup>nd</sup> Paragraph.

Air Force Response: Text has been revised as requested.

p. FOSET Page 35, 1<sup>st</sup> line.

<u>Air Force Response:</u> Text has been revised as requested.

q. FOSET Page 39, Section 8, 1<sup>st</sup> and 2<sup>nd</sup> paragraphs.

<u>Air Force Response</u>: Text has been revised as requested for the 1<sup>st</sup> paragraph. The change in the second paragraph will reflect the same language appearing in (i) on the previous page.

- 8. The USEPA provided comment on March 8th, 2012 to the Revised Final FOSET and CDR (shown at Attachment 5I). The USEPA comments and Air Force Responses are presented below:
  - a. CDR Comment 1; Page 7, Section 3.2.

Air Force Response: Text has been revised as requested.

b. CDR Comment 2; Page 9.

Air Force Response: Text has been revised as requested.

c. CDR Comment 3; Page 14, Section 8.1.9a), and Page 17, Section 9.3.

Air Force Response: Text has been revised as requested.

d. CDR Comment 4; Page 14, Section 8.2.

<u>Air Force Response:</u> Text has been revised as requested.

e. FOSET, Page 38, 1<sup>st</sup> full paragraph, 1<sup>st</sup> sentence.

<u>Air Force Response:</u> Text has been revised as requested.

f. FOSET, Page 42, Section 8.

Air Force Response: Text has been revised as requested.

9. The NYSDEC provided comment on March 19th, 2012 to the Revised Final SEBS, FOSET and CDR (shown at Attachment 5J). The NYSDEC indicated that all previous comments have been addressed. However, the NYSDEC requested a letter stipulating the Air Force commitments for Access, Remedial Elements, Annual Reporting, and Forwarding Landowner Reports on Institutional Controls (similar to the 14 May 2009 Air Force letter for the Golf Course, Industrial, and Western Areas FOSET).

Air Force Response: A letter similar to the May 2009 letter will be provided.

### FINAL COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) 120(h)(3) COVENANT DEFERRAL REQUEST (CDR) CENTRAL AIRFIELD AREA FORMER PLATTSBURGH AIR FORCE BASE (AFB), NEW YORK

#### **1. PURPOSE**

**1.1** The purpose of this CDR is to address the transfer of certain properties pursuant to CERCLA Section 120(h)(3) and identify CERCLA environmental factors associated with these properties at the former Plattsburgh AFB, New York, to determine whether the proposed transfer of such property associated with CERCLA sites FT-002 Fire Training Area/Industrial Area(IA) Groundwater Operable Unit (OU) and SS-004 Flightline Area Soil OU, prior to the completion of all remedial actions, is consistent with the protection of human health and the environment as addressed by CERCLA.

**1.2** This CDR is a result of an analysis of information contained in the following documents: (1) the Final Environmental Impact Statement (FEIS) for Disposal and Reuse of Plattsburgh AFB, dated November 1995; (2) the Asbestos Survey of Plattsburgh Air Force Base, dated December 1995; (3) the Closure Report for Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks, and Aboveground Storage Tanks (six volumes), dated April 1997; (4) the Final Underground Storage Tanks Site Characterization Report (Volumes 1 and 2), dated April 1999; (5) the Aircraft Refueling System Closure Report (four volumes), dated May 2000; (6) the Environmental Assessment of Alternative Land Uses (Supplement to the November 1995 FEIS), dated May 2000; (7) the Supplemental Evaluation to the Basewide Environmental Baseline Survey (three volumes), dated May 2001; (8) the Asbestos Assessment/Inspection at Selected Industrial Structures (two volumes), dated October 2001; (9) the Land Use Controls/Institutional Controls (LUC/ICs) Management Plan for the Former Plattsburgh AFB, dated October 2002; (10) the Report on Repair of Damaged Asbestos-Containing Material at Selected Industrial Structures, dated March 2003; (11) the Third Five-Year Review Report for Plattsburgh AFB, dated November 2009; (12) the Closure Report for Investigation/or Remediation of Miscellaneous EBS Factors - Solid/Hazardous Waste Sites, Petroleum Site, and PCB Sites, dated February 2005; (13) the Site FT-002 Fire Training Area Source Operable Unit Record of Decision, dated March 2001; (14) the Fire Training Area (FT-002) Source Operable Unit Operations and Monitoring Plan, dated January 2005; (15) the Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Interim Record of Decision, dated May 2003; (16) the Air Force Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Record of Decision, dated June 2005 (signed by the Air Force August 2005); (17) the Flightline (SS-004) Final Remedial Investigation Report (three volumes), dated August 2007; (18) the Site SS-005 Non-Destructive Inspection Facility Soil Operable Unit Record of Decision, dated March 1998; (19) the SS-006 Aerospace Ground Equipment Facility Soil Operable Unit Record of Decision, dated March 1998; (20) the Munitions Maintenance Squadron Final Record of

Decision, dated August 2008; (21) the Site SS-016 Nose Dock 8 Final Record of Decision, dated September 2008; (22) the Site SS-016 Nose Dock 8 Confirmatory Soil Boring and Sub-Slab Soil Gas Sampling Report, dated May 2007; (23) the Landfill LF-023 Source Control Record of Decision, dated September 1992; (24) the LF-023 (Groundwater Surface Water and Sediment) Record of Decision, dated January 1995; (25) the SS-027 Liquid Oxygen Plant NFRAP Decision Document, dated September 2004; (26) the Jet Engine Test Cell (SS-029) Site Investigation Report, dated December 1996; (27) the Building 2612 (SD-041) Final Remedial Investigation Report (three volumes), dated September 2008; (28) the NFRAP Decision Document for the Former Weapons Storage Area Radiological Waste Investigation, dated September 2004; (29) the Evaluation Report of Subsurface Conditions at the Mobil Service Station (Rt 22), dated August 1994; (30) the Post-Closure Monitoring Report (for September – December 2008) for IRP Site LF-023, dated March 2009; (31) the Addendum to the Report on the Idaho Avenue Groundwater Ammonia Contamination Investigation, dated October 2006; (32) the Building 3288 Diesel Fuel UST Closure Report, dated August 2005; (33) the Soil Vapor Intrusion Survey Data Summary Report (November 2006 – April 2007) for Industrial Area Buildings East of the Flightline Ramp, dated December 2008; (34) the Technical Memorandum for the Building 2793 Soil and Groundwater Sampling Event (October 7-9, 2008); dated December 18, 2008; (35) the Supplemental Soil Vapor Intrusion Survey Data Summary Report (March - April 2008), dated May 2009; (36) the Revised Supplemental Closure Report for the Washrack Area, dated January 2008; (37) the Removal Action Report for the Drum Removal Area, dated March 2007, (38) the Operations Summary and Progress Assessment (for 2006 – 2007) for the FT-002 Source Operable Unit, dated September 2008; (38) the Operations Summary and Progress Assessment (for 2008) for the FT-002/IA Groundwater Operable Unit, dated April 2009; (39) the Semi-Annual Monitoring Report for Selected Wells Upgradient from Kemp Lane, dated January 2009; (40) the March 2009 Sub-Slab Soil Gas and Indoor Air Sampling Results for Buildings 2763, 2766, and 2793; (41) the Plattsburgh AFB Revised Basewide Environmental Baseline Survey (EBS), dated May 1997; (42) the Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Draft Supplement to the January 2002 Final Proposed Plan, dated April 2010; (43) the Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Draft Record of Decision, dated May 2010; (44) the Semi-Annual Operations Report (July – December 2009) and 2009 Operations Summary and Progress Assessment for the FT-002/IA Groundwater Operable Unit, dated November 2010; (45) the Building 2766 Soil vapor Extraction System Design Document, dated November 2010; (46) the Industrial Area Buildings Data Summary Report for Sub-Slab Vapor Survey and Indoor Air Monitoring (March 2009 thru March 2010), dated December 2010; (47) the Operation and Monitor Report (December 2009 through December 2010) for the Former Building 2753 machine Shop Area Sub-Slab Soil Venting System, dated January 2011; (48) Visual Site Inspections dated March 2012; (49) the Finding of Suitability for Early Transfer (FOSET) for the Central Airfield Area, dated March 2012; (51) the USEPA Letter to the AFRPA dated 29 November 2011, regarding Invocation of Dispute Resolution; (52) the NYSDEC Letter to the AFRPA dated 1 December 2011, regarding vapor Intrusion Issues; and (53 the AFRPA Letter to the USEPA and the NYSDEC dated February 2012, regards the Central Airfield Area Finding of Suitability for Early Transfer and Soil Vapor Intrusion Restrictions. All documentation used for the preparation of this CDR is available for

review at the Air Force Center for Engineering and the Environment office at Plattsburgh, New York.

# 2. PROPERTY DESCRIPTION

The Central Airfield Area is located in the central portion of the former Plattsburgh AFB and consists of 34 buildings, 19 support structures, 5 navigational aids, paved areas, and various areas of open space and wooded land covering an area of approximately 725.79 acres (hereinafter referred to as the "Property"), and is shown at Exhibit 1A. The Property includes the following facilities:

Existing Facilities				
		Size or	Year	
<b>Facility Number</b>	Usage	Quantity	Constructed	
2700	Sound Suppressor	1,300 SY	1970	
2702	Runway Lighting Vault	870 SF	1956	
2704	Emergency Generator	1,560 SF	1960	
2706	Drainage Pond Aerator	N/A	1992	
2709	Support Structure (Concrete Pad)	N/A	1964	
2710	Base Photography Laboratory	5,118 SF	1956	
2712	Base Operations	13,059 SF	1956	
2713	Vehicle Parking Compound	8,888 SY	1957	
2714	Radio Maintenance/Transient Alert	5,376 SF	1956	
2716	Squadron Operations	5,376 SF	1956	
2720	Fire Station (Admin)	1,595 SF	1959	
2731	Training Aid (Platform)	N/A	1985	
2736	Security Police Operations	7,071 SF	1956	
2738	Fire Station (Admin)	7,071 SF	1956	
2739	Antenna Support Structure	N/A	1970	
2741	Aircraft Maintenance (Nose) Dock #1	28,046 SF	1956	
2748	Fire Station	17,182 SF	1956	
2749	Emergency Generator Shed	204 SF	1978	
2750	Wing Headquarters	15,177 SF	1957	
2752	Emergency Generator Sheds	300/100 SF	1988	
2753	Aircraft Maintenance Shop	58,546 SF	1956	
2754	Base Hazardous Storage	65 SF	1977	
2763	Aircraft Maintenance Hangar	166,367 SF	1956	
2766	Aircraft Maintenance (Nose) Dock #2	28,046 SF	1956	
2768	Loading and Unloading Platform	N/A	1981	
2774	Jet Engine Maintenance/Hazardous	30,720 SF	1956	
	Materials Pharmacy			
2776	Antenna Support Structure	N/A	1966	

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	Existing Facilities	C!	<b>X</b> 7
		Size or	Year
Facility Number	Usage	Quantity	Constructed
2780	Support Structure	N/A	1984
2784	Survival Equipment Shop	8,516 SF	1956
2785	Aircraft Maintenance (Nose) Dock #4	28,046 SF	1956
2786	Group Headquarters Admin	7,090 SF	1956
2787	Communications Facility	13,588 SF	1956
2789	Deicing System Pumphouse	1 EA	1992
2790	Deicing System Tanks	2 EA	1992
2793	Aircraft Maintenance (Nose) Dock #3	28,046 SF	1956
2794	Walk-In Cooler	1 EA	1980
2795	Concrete Pad	1 EA	1965
2796	Aircraft Parts Warehouse	5,376 SF	1956
2797	Dining Hall, Detached	5,376 SF	1956
2801	Weapons Systems Maintenance Shop	24,044 SF	1956
2802	Non-Destructive Inspection Lab	4,027 SF	1956
2808	Aircraft Maintenance (Nose) Dock #5	28,046 SF	1956
2815	Aircraft Support Equipment Shop	26,500 SF	1980
2816	Aircraft Support Equipment Storage	5,816 SY	1980
2818	Aircraft Maintenance (Nose) Dock #6	28,046 SF	1956
2820	Jet Engine Test Cell	3,472 SF	1969
2826	Vehicle Fueling Station	264 SF	1982
2827	Snow Dock	29,700 SF	1976
2836	Liquid Oxygen Storage	1,500 SF	1967
3005, 3010,	Aircraft Parking Apron	1,149,517 SY	1956
3015, 3020,			
3060, 3065,			
3070, 3075, 3080			
3030, 3050,	Aircraft Taxiway	145,387 SY	1957
3110, 3120,			
3130, 3140,			
3150			
3160	Paved Shoulder	172,406 SY	1957
3100	Runway	392,000 SY	1956
3145	Paved Overrun (North)	33,333 SY	1960
3218	TACAN Station	300 SF	1991
3227	Emergency Generator (Concrete Pad)	396 SF	1964
3229	Equipment Pad	53 SY	1978

#### **Existing Facilities**

# **Existing Facilities**

		Size or	Year
<b>Facility Number</b>	Usage	Quantity	Constructed
3235	Antenna Support Structure (Concrete	1 EA	1984
	Pad)		
3236	Aircraft Radar Station (Concrete	1 EA	1981
	Pad)		
3283	Visual Approach Facility	1 EA	1959
3294	Runway Supervisory Unit (Concrete	100 SF	1991
	Pad)		
3400	BCE Covered Storage	5,183 SF	1961
3592	MMS Admin	504 SF	1957

# **Former Facilities**

		Size or	Year
Facility Number	Usage	Quantity	Constructed/
			Demolished
2708	C-Band Radar Meteorological Set	N/A	1967/1995
2711	Billboard	N/A	1977/1997
2715	Storage Shed	160 SF	1964/2005
2751	Monument	N/A	1975/1997
2755	Monument	N/A	1978/1997
2759	Field Maint Accumulation Point	N/A	1992/1998
2760	Maint Hangar Accumulation Point	N/A	1992/1998
2764	Emergency Generator Shed	200 SF	1979/1997
2765	Monument	N/A	1979/1997
2770	Vehicle Operations Admin	720 SF	1986/1993
2775	Electrical Substation	7,515 KV	1956/2005
2777	Deluge System Reservoir	600,000 GAL	1957/2012
2779	Deluge System Pumphouse	1,462 SF	1957/2012
2803	Warehouse	93 SF	1956/2005
2810	Vehicle Fueling Station	576 SF	1980/1995
2811	Fuel Storage Tank	5,000 GAL	1980/1995
2812	Fuel Storage Tank	5,000 GAL	1980/1995
3063	Guard Tower	1 EA	1980/2005

Former Facilities					
Facility Number	Usage	Size or Quantity	Year Constructed/ Demolished		
3066, 3067, 3068, 3069, 3071, 3072, 3073, 3074,	Aircraft Shelters	9,833 SF/EA	1972/2009		
3076 3205 3220, 3230, 2240, 2250	ILS Shop Jet Fuel Pumphouse	720 SF 2,026 SF/EA	1986/1995 1956/1996		
3240, 3250, 3260, 3270, 3280, 3285		22,2000	1055(1005		
3221, 3231, 3261, 3281, 3286	Jet Fuel Systems	23-2800 GPM/EA	1956/1996		
3222, 3232, 3262, 3282, 3287	Emergency Generators	160 SF/EA	1964/1996		
3226	Septic System	1 EA	UNK/1996		
3237	Transformer Pad	5 SY	1981/1996		
3241, 3271	Jet Fuel Storage	14,286 BL	1956/1996		
3251	Av Gas Storage	2,381 BL	1957/1996		
3284	Wind Sock	1 EA	1961/2009		
3288	Emergency Generator	195 SF	1986/2009		
3289	Glide Slope Indicator	186 SF	1956/2009		
3290	Antenna Support Structure	2 EA	1980/2009		
3399	Elect Substation	2,000 KV	1961/2005		
3401	Septic System	1 EA	1961/1996		

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#### 3. NATURE AND EXTENT OF CONTAMINATION

**3.1** The United States Air Force (USAF), United States Environmental Protection Agency (USEPA), and New York State Department of Environmental Conservation (NYSDEC) entered into a Federal Facility Agreement (FFA) effective September 1991 under Section 120 of CERCLA.

**3.2** There are ten CERCLA Installation Restoration Program (IRP) sites located on portions of the Property as shown in Exhibits 1A and 1B. Not all remedial actions have been taken at two of these sites: the Fire Training Area (FT-002)/IA Groundwater OU, and the SS-004 Flightline Area Soil OU; it is for these sites that the Air Force requests a deferral of the CERCLA 120(h)(3)(ii)(I) covenant as allowed pursuant to CERCLA 120(h)(3)(C)(i). These two

sites are discussed in more detail below. The other eight sites include four that require no further action (SD-001, SS-017 Soil OU, SS-027, and SS-029 Soil OU) and three where the only remaining necessary action is placing certain restrictions on the relevant portions of the Property. These three are SS-005 Soil OU, SS-006 Soil OU, and LF-023. In essence, all remedial action will have been taken with regard to these three sites upon placement of the restrictions in the deed at the time of transfer. The last site of the ten referred to above is the FT-002 Source OU (which is different from the Fire Training Area (FT002)/IA Groundwater OU). The Air Force believes this site has been fully remediated and has requested regulatory concurrence for that completion; it is preparing additional information as requested by the regulators. These other sites (other than the Fire Training Area (FT-002)/IA, and the SS-004 Flightline Area Soil OU) are discussed in more detail in Section 5 of the Finding of Suitability for Early Transfer (FOSET) for the Central Airfield Area.

<u>**FT-002</u>** is the former fire training area. Remedial activities are being conducted under two OUs; the FT-002 Source OU is discussed in the FOSET for the Central Airfield Area.</u>

<u>The FT-002/ (IA) Groundwater OU</u> addresses contaminated groundwater at and downgradient from the FT-002 Source OU, and groundwater at or near six other IRP sites including SS-004, SS-005, SS-006, SS-011, SS-017, and SS-041. The FT-002/IA Groundwater OU is partially located within this Property and is shown at Exhibits 1A, 1B, and 2. This OU encompasses an area of approximately 978 acres; approximately 714.55 acres of this OU are located within this Property (the other portions of this OU were evaluated in the January 2009 FOSET for the Golf Course, Industrial, and Western Areas). The groundwater contamination includes chlorinated hydrocarbons and fuel-related compounds, and extends over one mile downgradient from the FT-002 source area. The groundwater contamination was investigated and remediation alternatives were evaluated in a Remedial Investigation/Feasibility Study (RI/FS), which was finalized in 2001. An Interim Record of Decision (IROD) that addresses the FT-002/IA Groundwater (GW) OU was signed by the Air Force and the USEPA in June 2003, and the physical remedy (identified below) has been constructed.

After significant discussions from 2005 through 2007 of the potential for vapor intrusion risks, the Air Force performed an evaluation of soil vapor intrusion into the industrial area within the groundwater contamination plume, and an Evaluation Report has been completed. Results of the sampling and investigation of the following buildings in the FT-002/IA Groundwater OU are provided below.

<u>Building 2753</u> was sampled for sub-slab soil gas vapors in 2006 and Trichloroethylene (TCE) was detected at a concentration of 18,000 micrograms per cubic meter ( $\mu$ g/m<sup>3</sup>) in the northern portion of the building. Indoor air was also sampled, in 2007; chlorinated solvents (PCE and/or TCE) were detected at all locations, but at concentrations less than 1.62  $\mu$ g/m<sup>3</sup> (total chlorinated solvents), but may have been a result of the industrial use of the building for aircraft maintenance activities. A soil vapor extraction (SVE) system has been installed to address sub surface soil gas contamination under the northern portion of the building, and has been in operation since December 2009. Sub-slab soil gas sampling was conducted in November 2010,

at the same locations as the 2006 sampling event, to assess the remediation progress since activation of the SVE system. The highest detected concentration was 620  $\mu$ g/m<sup>3</sup> TCE, which was at the same location where 18,000  $\mu$ g/m<sup>3</sup> was detected in 2006. All other TCE, and all PCE, detections were less than their corresponding 2006 sampling results. Operation of the SVE system is still ongoing.

<u>Building 2763</u> was sampled for sub-slab soil gas vapors in 2006 and 2009. In the 2006 sampling event, Tetrachloroethene (PCE) was detected at four (4) out of five (5) locations, at concentrations up to 150  $\mu$ g/m<sup>3</sup>. TCE was detected at three (3) out of five (5) locations, and was detected at concentrations above 100  $\mu$ g/m<sup>3</sup> at two (2) of these locations. Building 2763 was resampled in 2009 (at the same locations as sampled in 2006), in consultation with the NYSDEC and USEPA, to determine if concentrations are decreasing similar to the decreases in the FT-002 groundwater contamination that are occurring in this area. In the 2009 sampling event, PCE was detected at only two (2) locations, and no higher than 5.3  $\mu$ g/m<sup>3</sup>; TCE was still detected at three (3) locations, but no higher than 12  $\mu$ g/m<sup>3</sup>. Indoor air was also sampled, in 2007 and 2009; PCE was detected at 0.75  $\mu$ g/m<sup>3</sup> at one location in 2007, and there were no detections during the 2009 sampling event. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2766</u> was sampled for sub-slab soil gas vapors in 2006, 2008 and 2009. In the 2006 sampling event, TCE was detected at all three (3) locations, at concentrations up to 4,400  $\mu$ g/m3. In the 2008 sampling event (which included the three (3) original locations, and four (4) additional locations) TCE was detected at all locations but at much lower concentrations (the maximum concentration was 510  $\mu$ g/m<sup>3</sup>). In the 2009 sampling event, TCE was again detected at all locations, but at higher concentrations than were detected in 2008 (the highest detected concentration was 1,200  $\mu$ g/m<sup>3</sup>). Indoor air was also sampled, in 2007 and 2008, but there were no detections. Installation of a soil vapor extraction system, to address subsurface soil gas contamination was recommended, and a soil vapor extraction system has been constructed and been in operation since December 2010. Operation of the SVE system is still ongoing.

<u>Building 2786</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Benzene, Ethylbenzene, and o-Xylene were detected in the sub-slab soil gas at 0.89, 0.96, and 1.6  $\mu$ g/m<sup>3</sup> respectively at one location, but were not detected at the other location. Toluene was detected at 2.4 and 1.2  $\mu$ g/m<sup>3</sup> at the two sample locations. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2786. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2793</u> was sampled for sub-slab soil-gas vapors in 2006 and 2009; in addition, a soil and groundwater investigation was conducted in 2008. In the 2006 sampling event, chlorinated solvents (TCE and PCE) were not detected; however, petroleum compounds Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) were detected at all three (3) locations at concentrations of 2,437 - 14,445  $\mu$ g/m<sup>3</sup> (total BTEX). Indoor air sampling was conducted in 2007, and BTEX compounds were detected at all five (5) locations at concentrations up to 12.1

 $\mu g/m^3$ ; however, the same compounds were also found in the various chemicals and fuels being used in the building (as part of the building's use for aircraft storage and maintenance) and therefore their presence was not likely attributable to soil vapor intrusion. A soil and groundwater investigation was conducted, in 2008, to determine if there is a source of contamination present that is causing the high levels of BTEX in the sub-slab soil gas. The 2008 soil and groundwater investigation found no source of contamination but recommended resampling the sub-slab soil gas to verify the results of the 2006 sampling event. The 2009 sampling event found significant reductions in BTEX concentrations at two (2) locations, the total BTEX concentrations detected at the third location was in excess of 48,000  $\mu$ g/m<sup>3</sup>, even though soil and groundwater sampling, via geo-probe, of this very location six months earlier did not detect BTEX. Additional sampling has been performed (March 2010); a sub-slab soil gas sample was collected at the location of the potentially anomalous result from March 2009, and several other locations throughout the building. The total concentration of BTEX compound in each sample was less than 100  $\mu$ g/m<sup>3</sup>, which confirms that the March 2009 results were likely anomalous. In summary, no source of contamination has been found in the soil or groundwater beneath Building 2793 and the BTEX concentrations in the sub-slab soil gas and indoor air samples appear minor. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2796</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Toluene was detected at 1.5 and 3.8  $\mu$ g/m<sup>3</sup> at the two sample locations. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2796. Based on the sampling results there appears to be limited potential for soil vapor intrusion. However, as a precaution due to its location over the groundwater contamination plume, Building 2796 is subject to a Non-Residential Use Restriction and a Soil Vapor Intrusion Restriction as shown at Exhibits 1A-2 and 1A-3, and as described at Exhibits 2-1 and 2-2.

<u>Building 2797</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Toluene and m,p-Xylene were detected in the sub-slab soil gas at 1.4 and 2.5  $\mu$ g m<sup>3</sup>/ respectively at one location, but were not detected at the other location. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2797. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

The seven buildings discussed above are among other facilities located within the boundaries as shown at Exhibit 1A-2 and 1A-3 that will be subjected to the agreed upon non-residential use and SVI restrictions as stated in the February 2012 AFRPA letter. The Institutional Controls, and a Non-Residential Use restriction, to address the potential soil vapor intrusion pathway have been identified as part of the planned remedy for the Fire Training Area (FT-002)/IA Groundwater OU and are further detailed at Exhibits 2-1 (as shown within the green line) and 2-2 (as shown within the blue line).

The Final Remedy for the FT-002/IA Groundwater OU is expected to include: institutional controls (e.g., lease and deed restrictions shown at Exhibits 1A and 2B) to limit the use and discharge of groundwater (Exhibits 1A-2 and 2-1), to prohibit property development within the defined area that would interfere with remedial operations, prohibit residential property development and residential land use (Exhibits 1A-2 and 2-1), and either perform sampling to show no unacceptable risk is present, or perform mitigation measures to address the unacceptable potential risk from vapor intrusion for future construction and future building modifications that could increase human exposure and new building construction (the vapor intrusion restrictions are shown at Exhibits 1A-3 and 2-2); three groundwater collection trenches, (one located between the runway and flightline, one located along the eastern edge of the flightline, and one located along Idaho Avenue); extraction wells located in the plume core west of the runway; groundwater treatment systems to treat contaminated groundwater from the collection systems discharging to the WSA and Golf Course drainage systems, soil vapor extraction (SVE) systems to address sub surface soil gas contamination and the potential for health risks from potential soil vapor intrusion; groundwater and surface water monitoring; and five-year site reviews in accordance with Section 121(c) of CERCLA.

Construction of the physical components of the remedial action, including the SVE systems, has been completed. The groundwater portion of the remedial action has been operating since February 2005. The Building 2753 and 2766 SVE systems have been constructed and have been operating since December 2009 and December 2010 respectively. Exhibit 1C shows the extent of the groundwater contamination presented in the 2001 RI/FS compared to the current extent of contamination based on the 2009 annual groundwater sampling event. There has been a significant reduction in the extent of the groundwater contamination. A Supplemental Proposed Plan and Revised ROD to document these elements have been submitted for regulatory review (April and May 2010). Regulatory comments to the Supplemental Proposed Plan have been received (July 2010) and are being addressed. The Revised ROD will be resubmitted after completion of the Supplemental Proposed Plan (Summer 2012).

<u>SS-004 Soil OU</u> is the flightline, covers an area of approximately 265.82 acres, is located in the central portion of this Property, and shown at Exhibit 1B. The most prominent feature within the site is the concrete and asphalt flightline ramp, which was used for aircraft parking and refueling during the period from 1954 to 1995. An underground fuel distribution system, referred to as the Aircraft Refueling System (ARS), was also present beneath the ramp. The distribution system consisted of eight pumphouses with underground tanks located along the western edge of the flightline with lateral fuel distribution lines running underneath the ramp from west to east. The ARS was dismantled in 1996. Spills have resulted from aircraft operations and maintenance and may have migrated to soils and drainage ways along the perimeter of the ramp, particularly to the south and east. Another potential contaminant source includes aircraft exhaust particulate accumulating in the surface soils. Groundwater contamination in the flightline (SS-004) area is being addressed and monitored as part of the Fire Training Area (FT-002)/IA Area Groundwater OU. The RI for this site was done in 1993, but was updated in 2003 to incorporate data collected from the ARS closure, the Fire Training Area (FT-002)/IA Groundwater OU RI/FS, the Pumphouse #3 groundwater investigation, and

additional fieldwork (soil, sediment, and surface water sampling) collected in 2002. Widespread metals and polyaromatic hydrocarbon (PAH) contamination is present in the surface soils adjacent to and east of the flightline ramp. This contamination is likely the result of the combustion of fossil fuels from aircraft and service vehicles; the eastern edge of the flightline ramp is situated on the down slope and downwind side of the ramp. The contamination decreases rapidly with depth and is likely of concern only within a few inches of the ground surface. Generally, only low concentrations of chemicals were detected in subsurface soils adjacent to and beneath the flightline ramp. However, VOCs were detected in excess of standards in subsurface soils in the vicinities of former Pumphouses #2 and #3 on the western side of the ramp. The Pumphouse #3 area was investigated thoroughly and separately from the SS-004 RI; routine groundwater monitoring is ongoing in this area. Approximately 5,900 cubic yards of soil were removed as part of the Pumphouse #2 removal in 1996. Groundwater sampling at the former Pumphouse #2 was initiated in March 2005 (as part of the annual groundwater sampling for the Fire Training Area (FT-002)/IA Groundwater OU) and discontinued in 2008 when sampling results indicated no exceedances of groundwater standards. Surface water samples were collected as part of the RI; no detections exceeded surface water Applicable or Relevant and Appropriate Requirements (ARARs). Sediment samples were collected in the drainage ways during the RI and in 2002. The sediment contamination was evaluated in the Human Health Risk Assessment and Ecological Risk Assessment. No unacceptable risk is associated with human receptor exposure to the contaminated sediment. There is a potential ecological risk to avian species due to metals contamination in the surface soil; mitigation of this risk will likely be accomplished via bird population control as part of commercial air operations that are taking place at this site. A Final RI Report has been completed (2007). A Draft Proposed Plan is in progress (will be submitted Summer 2012).

# 4. ANALYSIS OF INTENDED FUTURE USE

The County of Clinton has requested conveyance of the Property pursuant to the Defense Base Closure and Realignment Act of 1990, Pub. L. No. 101-510 and Section 2903 of Pub. L. No. 103-160 (10 U.S.C.§ 2687 note), for the purpose of economic redevelopment of the base. Redevelopment of this Property will be for conversion of the former military airfield and aviation support facilities into an international airport. The November 1995 Environmental Impact Statement, and the May 2000 Supplemental Environmental Assessment, for reuse of this Property reflects limitation in use to aviation support, and commercial or industrial operations.

#### 5. RISK ANALYSIS

A site specific risk analysis has been performed for the Fire Training Area (FT-002)/IA Groundwater OU and the SS-004 Flightline Area Soil OU.

The results of the risk assessments and methodology used in determining the human health and ecological risks are presented in the following documents: the March 1993 Final FT-002 Soil Remedial Investigation Report; the June 2001 Final Fire Training Area (FT-002)/IA Groundwater OU Remedial Investigation/Feasibility Study; the December 2008 Soil Vapor

Intrusion Survey Data Summary Report for Industrial Buildings East of the Flightline Ramp; and the August 2007 Final Flightline (SS-004) Remedial Investigation Report.

These risk assessments were used to determine the need for remedial actions and the locations of the resulting restrictions are shown on exhibit 2.

# 6. PROJECTED SCHEDULE FOR RESPONSE/CORRECTIVE ACTION AND OPERATION AND MAINTENANCE REQUIREMENTS

The projected schedule for IRP Sites requiring deferral of the CERCLA Covenant is presented below:

Final Remedial Investigation/Feasibility Study Report, June 2001	Complete
Final Proposed Plan, January 2002	Complete
Draft Final Record of Decision Submitted, July 2002	Complete
Revised Draft Final Record of Decision Submitted, March 2003	Complete
Interim Record of Decision Signed, June 2003	Complete
Construction of Physical Remedy Started, 2003	Complete
Second Revised Draft Final Record of Decision Submitted, December 2003	Complete
Operation of Runway Collection Trench and Treatment Plant Initiated, 2004	Complete
Completion of Physical Remedy Construction, 2005	Complete
Record of Decision Signed by Air Force [not executed by EPA], June 2005 (August	Complete
2005)	
Draft Operations and Monitoring Plan, June 2006	Complete
Soil Vapor Intrusion Survey Data Summary Report, December 2008	Complete
Final Record of Decision	Fall 2012
Implementation of Remedy (Remedy in Place)	
	2012
Finalize Operations and Monitoring Plan	December
	2012
Five-Year Review	Fall 2014*
Projected Cleanup Complete	2083

# 6.1 Schedule for IRP Site FT-002, Fire Training Area/IA Groundwater OU

\* Will be accomplished every 5 years until no longer required.

#### 6. 2 Schedule for IRP Site SS-004, Flightline Area Soil OU

Final Remedial Investigation Report, August 2007	Complete
Submit Draft Proposed Plan	Summer 2012
Complete Proposed Plan, Submit Draft ROD	Fall 2012
Final ROD (NYSDEC Concurrence, USEPA Signature)	December
	2012

\* Will be accomplished every 5 years until no longer required

#### 7. PUBLIC COMMENTS

On June 7<sup>th</sup>, 2010, public notice of the proposed transfer of the Property was provided in the Plattsburgh Press-Republican. A public comment period was held from June 7<sup>th</sup>, 2010 through July 6<sup>th</sup>, 2010; no comments were received.

#### 8. CONTENTS OF DEED AND TRANSACTION DOCUMENTS

**8.1 Deed Assurances:** The following covenants and restrictions will be included in the quit claim deed (see Exhibit 2) in substantially the following form:

**8.1.1** With respect to CERCLA Sites FT-002 Fire Training Area/IA Groundwater OU, the Grantee will be prohibited from the installation of any wells to extract drinking water or for any other purposes that could result in the use of the underlying groundwater within the areas shown at Exhibit 1A-2.

**8.1.2** With respect to CERCLA Site FT-002 Fire Training Area/IA Groundwater OU, except for environmental response actions conducted by the Air Force pursuant to CERCLA, the Grantee will be prohibited from discharging groundwater that is withdrawn within the areas shown at Exhibit 1A- 2 during construction dewatering to the ground or surface water without prior approval of NYSDEC in accordance with substantive requirements of the State Pollution Discharge Elimination System (SPDES).

**8.1.3** With respect to CERCLA Site FT-002 Fire Training Area/IA Groundwater Operable Unit shown at Exhibits 1A and 2, the Grantee will be prohibited from Property development or land use that would interfere with the proper operation of the remedy selected in the Interim FT-002 ROD. This includes the prohibition of any development within 20 feet of any aboveground structure or underground structure (including but not limited to pumping wells, underground and overhead electrical wiring, collection drains, piping, permeable treatment walls, groundwater treatment facilities, aeration basins, manholes, and pump stations) constructed as part of the physical remedy, or within 5 feet of any monitoring point which will be used in the monitoring of the physical remedy, without pre-approval by the USAF.

**8.1.4** With respect to the potential for risks posed via indoor air contaminated by chemicals volatilizing from below the building slab ("vapor intrusion"), a grantee covenant will be included in the deed of any property within the SVI restriction area, shown at Exhibit 1A-3, that will require either of the following: (a) mitigation of any unacceptable risk as that risk is determined under CERCLA and the NCP in a circumstance with (1) any construction of new buildings (which includes any expansion of the footprint of an existing building) or (2) any change in the current use of existing buildings to a use that would increase the potential exposure of its users to vapor intrusion (i.e. "up zoning"); or (b) an evaluation of the potential for unacceptable risk associated with vapor intrusion that must occur prior to any construction of new buildings or any up zoning in the current use of existing buildings, and if an unacceptable risk under CERCLA and the NCP associated with vapor intrusion is posed, mitigation of the

vapor intrusion shall be included in the design/construction of the structure prior to occupancy or implemented prior to change in use. Any such mitigation or evaluations will be coordinated with the USEPA and NYSDEC. This covenant will remain on the property until the property meets applicable criteria for acceptable risk for specified property use as such criteria and use are established in an applicable ROD, or until such time as it is agreed to by the Air Force, USEPA, and NYSDEC.

**8.1.5** With respect to CERCLA Sites FT-002 Fire Training Area/IA Groundwater OU, the transaction documents will restrict the use of the Property shown at Exhibit 1A-2 to non-residential use.

**8.1.6** With respect to CERCLA Site FT-002 Fire Training Area/IA Groundwater OU, the Grantee will conduct any excavations subject to institutional controls, within the area shown at Exhibit 2, in a manner that prevents migration of groundwater contamination into the deep groundwater aquifer. Penetration of the subsurface clay confining layer, without the prior written approval of the Air Force, NYSDEC, and the USEPA is prohibited.

**8.1.7** The Grantee agrees that groundwater monitoring wells must not be disturbed, and Air Force and regulator access to these wells must be allowed at all times.

**8.1.8** The Grantee will not engage in any activities that will disrupt required remedial investigation, response actions and oversight activities, should any be required. Grantor agrees to coordinate its remediation activities with the Grantee's capital improvement construction schedule so as not to unreasonably disrupt such schedule.

8.1.9 The Grantor hereby warrants to the Grantee and its successors and assigns that

- a) Pursuant to section 120(h)(3)(A)(ii) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(ii)), the United States warrants that all remedial action necessary to protect human health and the environment with respect to any hazardous substance identified pursuant to section 120(h)(3)(A)(i)(I) of CERCLA remaining on the Property has been taken before the date of the deed, except with respect to CERCLA Sites FT-002 Fire Training Area/IA Groundwater OU and SS-004 Flightline Area Soil OU, and
- b) Any additional remedial action found to be necessary after the date of this deed for the Property shall be taken by the United States.

# 8.2 <u>Contractual Assurances</u>: The following assurances shall be included in the deed or transaction documents:

**8.2.1** Assurance in the deed that with respect to releases or threatened releases of a hazardous substance that occurred before the date of [this] deed from CERCLA Sites FT-002

Fire Training Area/IA Groundwater OU and SS-004 Flightline Area Soil OU, all necessary response actions shall be taken by the United States.

**8.2.2** Assurance as to when investigation and response activities will occur: with regard to the projected schedule of necessary response actions, see Section 6, Projected Schedule for Response/Corrective Action and Operation and Maintenance Requirements, for projected completion schedules.

8.2.3 Assurance with regard to response actions and necessary restrictions

- a) In addition to the restrictions set forth in Section 8.1, above, the following additional restrictions on the use of portions of the Property as described below are necessary to ensure protection of human health and the environment regarding CERCLA hazardous substances: Until such time as the CERCLA IRP sites and Areas of Concern (AOC) have been addressed and remedial action objectives have been completed, all activities within sites FT-002 Fire Training Area/IA Groundwater OU, and SS-004 Flightline Area Soil OU, will be subject to the following conditions:
  - The Grantee will provide the Air Force with sixty (60) days' advance written notice of all proposals for any alterations or construction that requires excavating in or under structures, concrete flooring, soil, and or groundwater, or that will impede or impair any response activities. The notice shall be accompanied by a detailed written description of proposed alterations. Notwithstanding the above, the Grantee shall be under no obligation to provide notice of any alterations that will be undertaken totally within any structure located on the Property provided that such work will not impede or impair any response activities.
  - 2. The Air Force review process for alterations proposed to be undertaken within a CERCLA site will be completed within thirty (30) days of receipt of notice and a complete description of the planned alterations. In the event problems are detected during the review or additional information is required, the Air Force will promptly notify the Grantee's representative. Any additional information needed by the Air Force to complete its review will be provided upon receipt of any such Air Force request. The Grantee shall not proceed with any proposed alterations until it has received written notice from the Air Force that the proposed alterations are acceptable to the Air Force. Approval will not be unreasonably withheld.
  - 3. Access to the site will be restricted to those Grantee personnel necessary to conduct the approved activities.
- b) Pursuant to Section 120(h)(3)(A)(iii) of CERCLA, 42 U.S.C. §9620(h)(3)(A)(iii), the United States retains and reserves a perpetual and assignable easement and right of

access on, over, and through the Property, to enter upon the Site FT-002 Fire Training Area/IA Groundwater OU, shown at Exhibit 2, in any case in which a remedial action or corrective action is found to be necessary on the part of the United States, without regard to whether such remedial action or corrective action is on the Property or on adjoining or nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, test pitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the Grantee and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the Grantee or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the Property and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the Grantee's and the Grantee's successors' and assigns' quiet enjoyment of the Property. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the Property at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the Grantee, nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the United States.

In exercising such easement and right of access, neither the Grantee nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer or employee of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause: Provided, however, that nothing in this paragraph shall be considered as a waiver by the Grantee and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

c) The Grantee will ensure compliance with the provisions of any health and safety plan in effect or any hazardous substance remediation or response agreement with environmental regulatory authorities during the course of any CERCLA response or remedial action(s) undertaken on the Property. Any inspection, survey, investigation, or other CERCLA response actions shall be coordinated with representatives designated by the Grantee. The Grantee, its contractors, assignees, licensees, or invitees shall have no claim against the Air Force or any officer, agent, employee, contractor, or subcontractor thereof so long as such activities are undertaken to protect human health and the environment.

d) Budgeting for Response Actions. The Air Force will submit through its established budget channels to the Director of the Office of Management and Budget a request for funds that adequately addresses schedules for investigation and completion of all response actions required as identified herein for sites that require additional response action. A budget request for the projects scheduled to be completed has been submitted. Expenditure of any federal funds for such investigations or response actions is subject to Congressional authorization and appropriation of funds for that purpose.

### 9. FINDING OF SUITABILITY FOR EARLY TRANSFER

**9.1** The proposal to transfer the Property has been adequately assessed and evaluated under CERCLA for: (a) the presence of CERCLA hazardous substances and contamination on the Property; (b) environmental impacts anticipated from the intended use of the Property; and (c) the adequacy of use restrictions and notifications to ensure that the intended use is consistent with protection of human health and the environment. The anticipated 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 restrictions on use and disclosures as described above. The Property therefore is suitable for early transfer.

**9.2** Additionally, the proposal to defer inclusion of the CERCLA 120(h)(3)(A)(ii)(I) covenant has been adequately assessed and evaluated to assure that, with respects to IRP Sites FT-002 Fire Training Area/IA Groundwater OU and SS-004 Flightline Area Soil OU: (a) the transfer will not delay CERCLA environmental response actions, (b) the anticipated reuse of the Property will not pose a risk to human health or the environment, and (c) the obligation of the federal government to perform all necessary response actions will not be affected by the early transfer of this Property. The Property, therefore, is suitable for early transfer.

**9.3** The covenant required by CERCLA 120(h)(3)(A)(ii)(I) will be deferred only with respect to Sites FT-002 Fire Training Area/IA Groundwater OU and SS-004 Flightline Area Soil OU. Pursuant to Section 120(h)(3)(A)(ii)(II) of CERCLA, the United States warrants that any additional remedial action found to be necessary for the transferred Property after the date of the deed shall be conducted by the United States. A clause will be included in the deed granting the United States access to any portion of the Property in the event that CERCLA remedial action is necessary after transfer. When all response action necessary to protect human health and the environment has been taken, the transferee will receive a warranty pursuant to CERCLA 120(h)(3)(C)(iii) that satisfies the requirement of CERCLA 120(h)(3)(ii)(I).

9.4 Based on the findings stated above and in the Finding of Suitability for Early Transfer, it is requested that the United States Environmental Protection Agency, with concurrence of the State of New York, defer the requirements of CERCLA 120(h)(3)(a)(ii)(I) with respect to the property associated with CERCLA Sites FT-002 Fire Training Area/IA Groundwater OU and SS-004 Flightline Area Soil OU, that all response actions have been taken before transfer.

**REQUESTER:** 

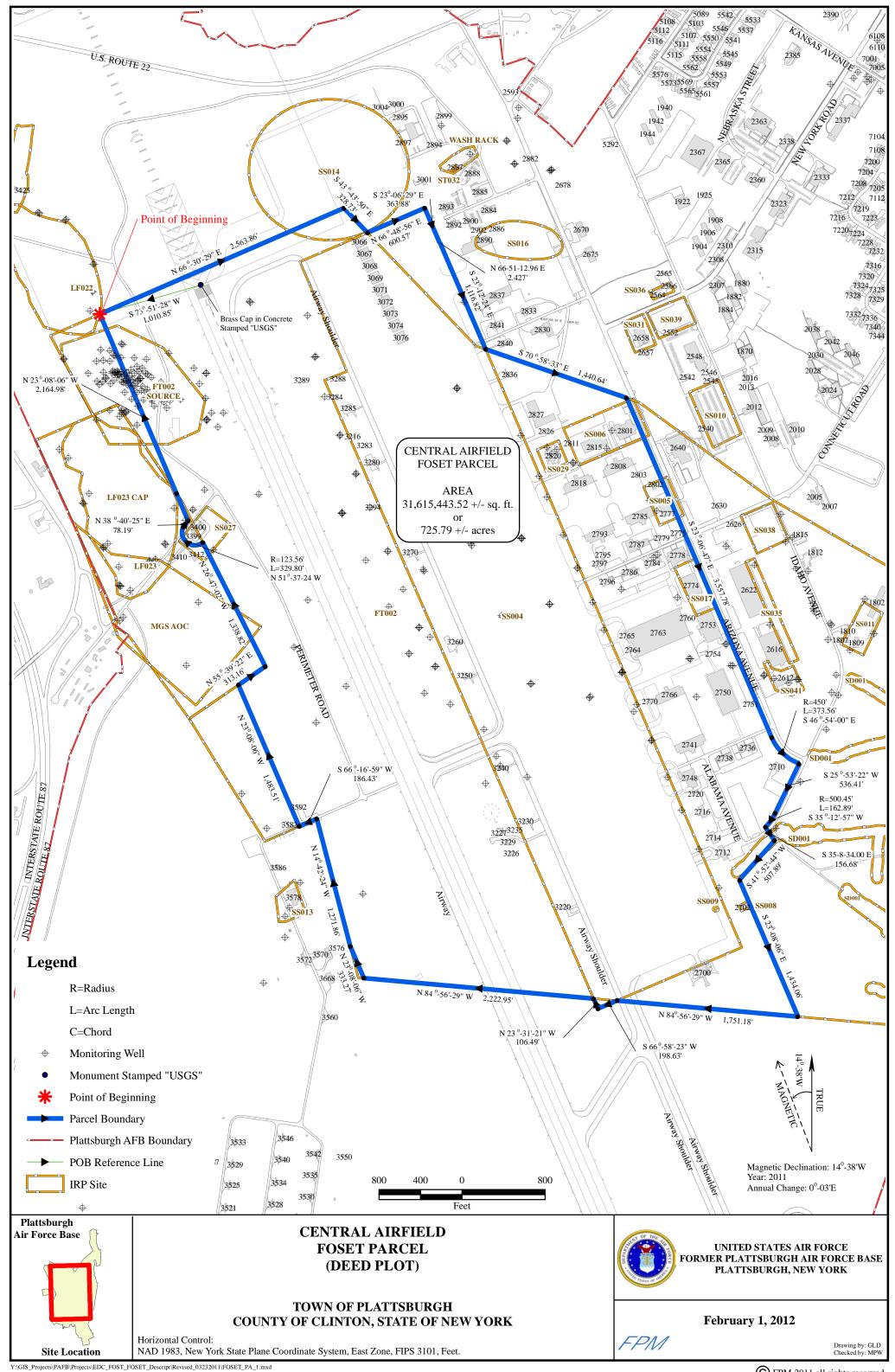
9/2012 Date: 4/

Robert M Moore, SES Director Air Force Real Property Agency

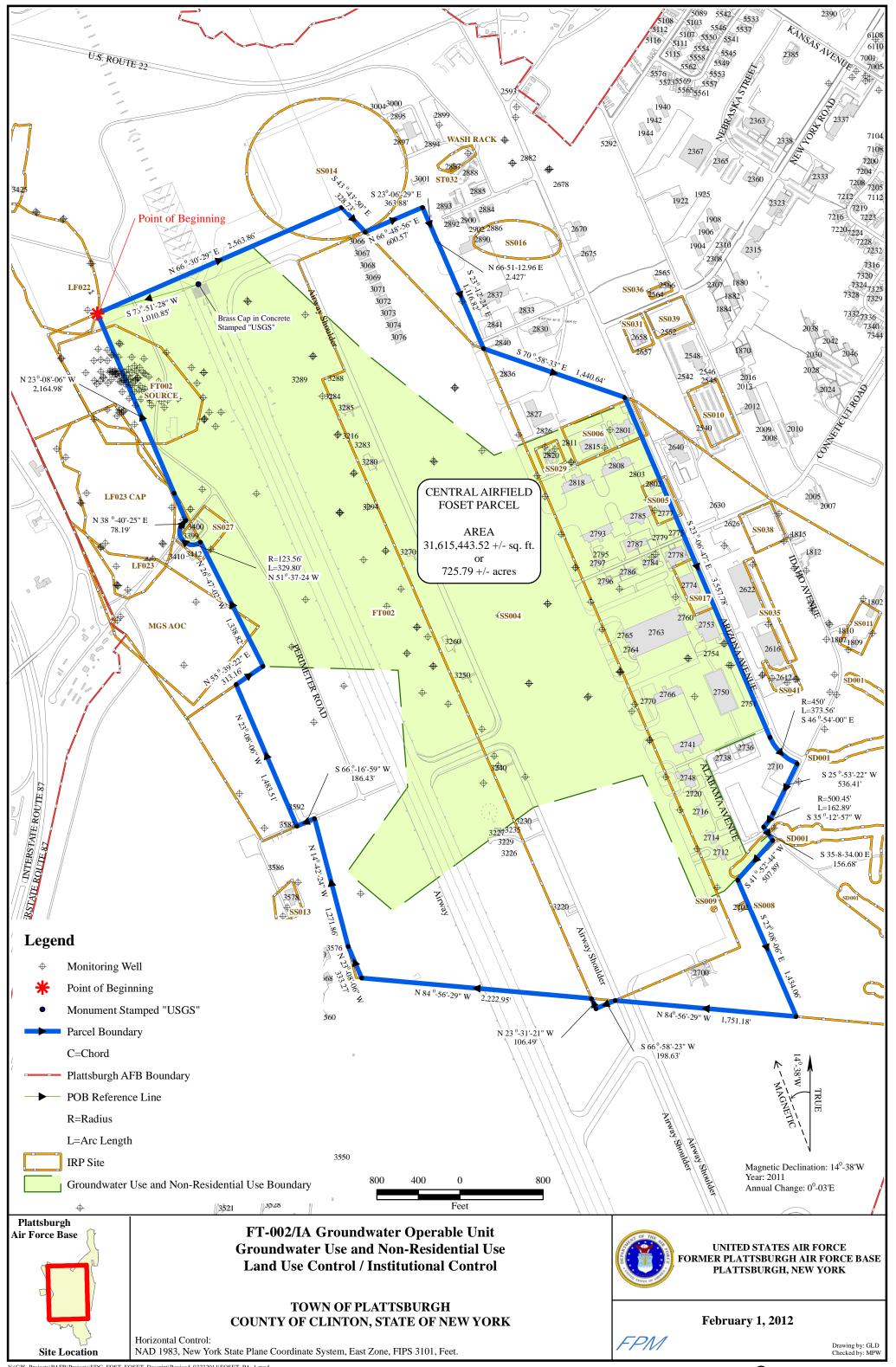
Exhibit 1A-C. Location Plans Exhibit 2. IRP Site FT-002 Fire Training Area/IA Groundwater OU LUC/ICs

> CDR, Central Airfield Area, Former Plattsburgh AFB, March 2012

Central Airfield CDR Exhibit 1A-1

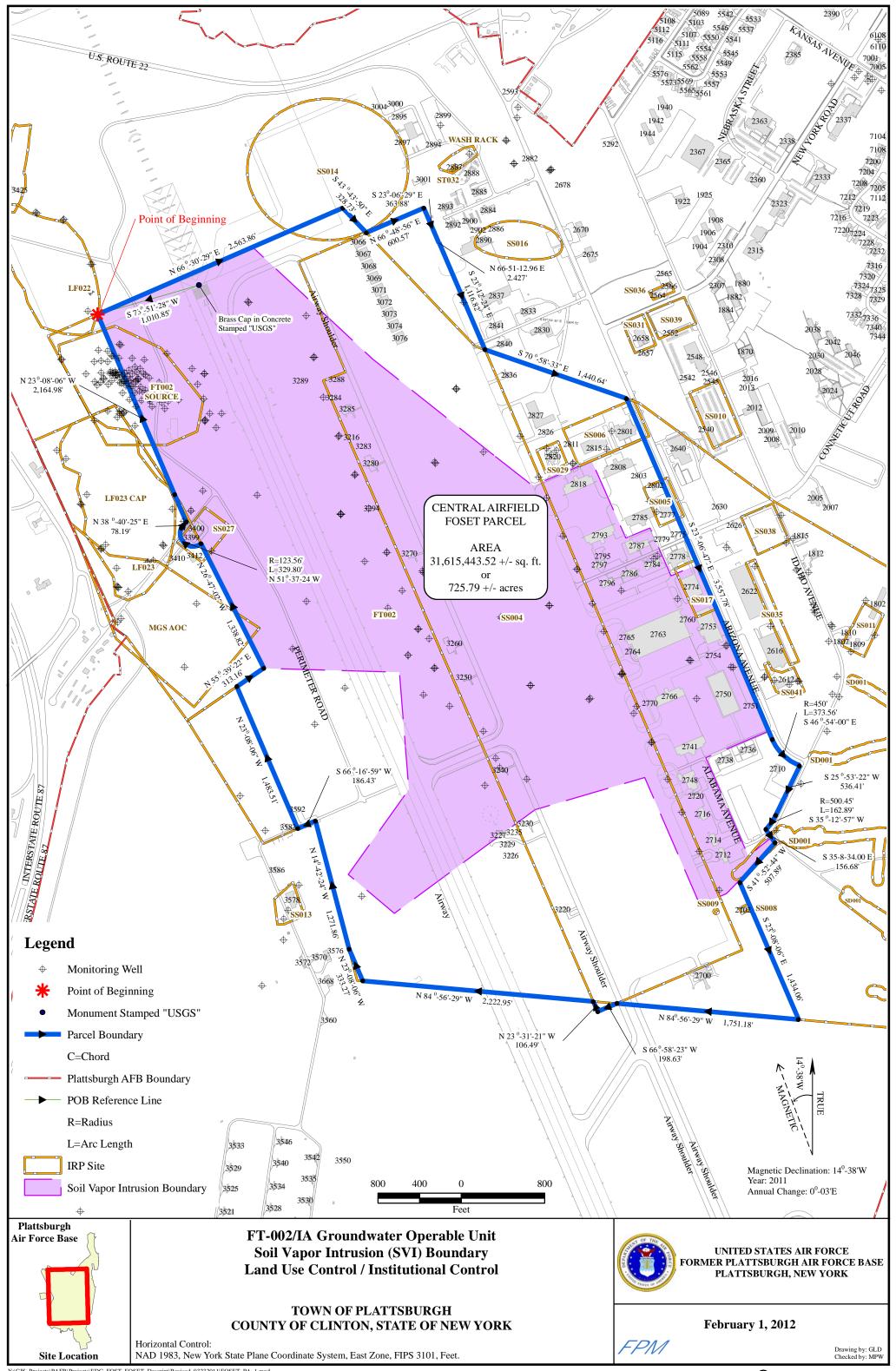


Central Airfield CDR Exhibit 1A-2



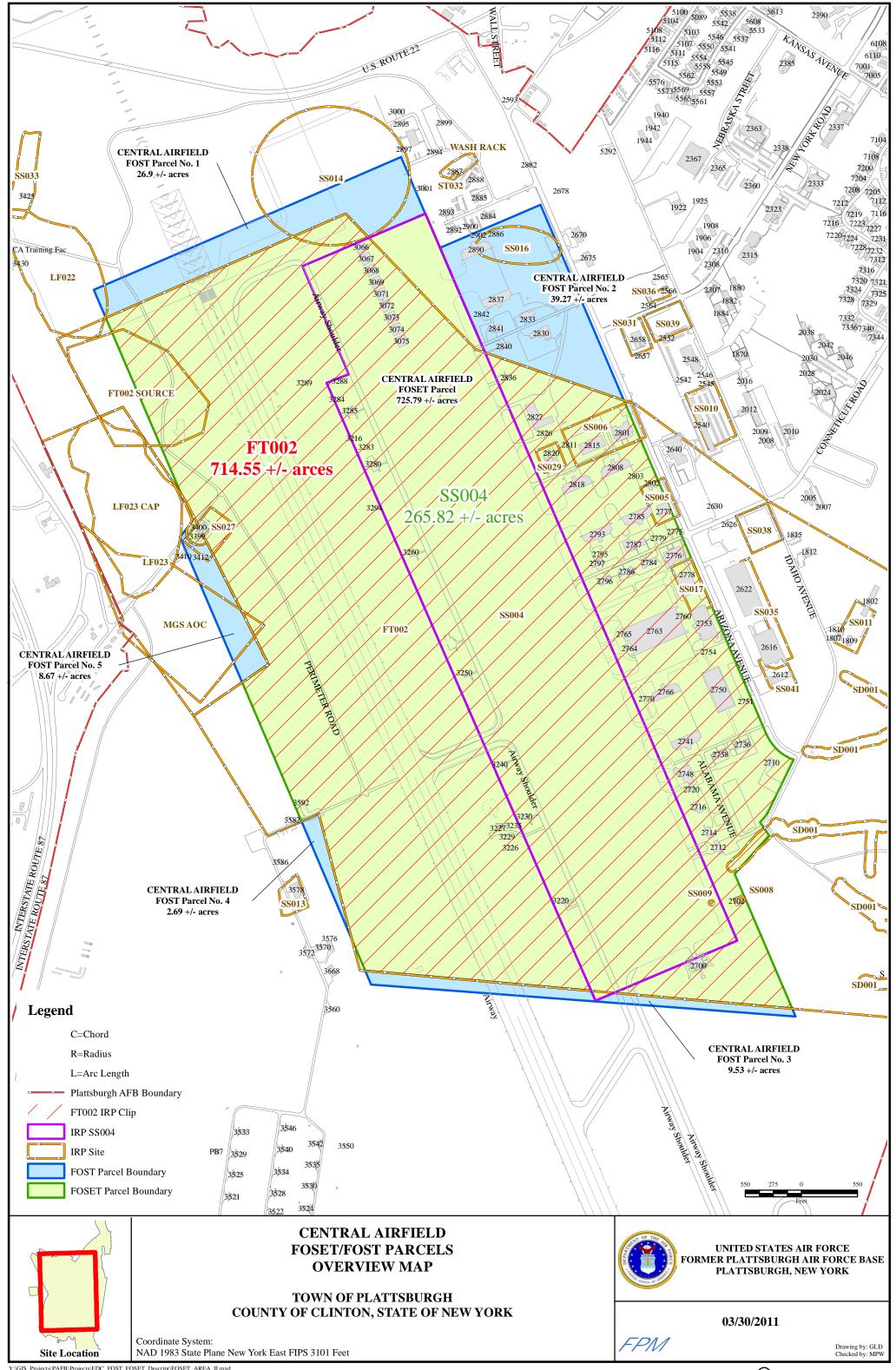
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Central Airfield CDR Exhibit 1A-3

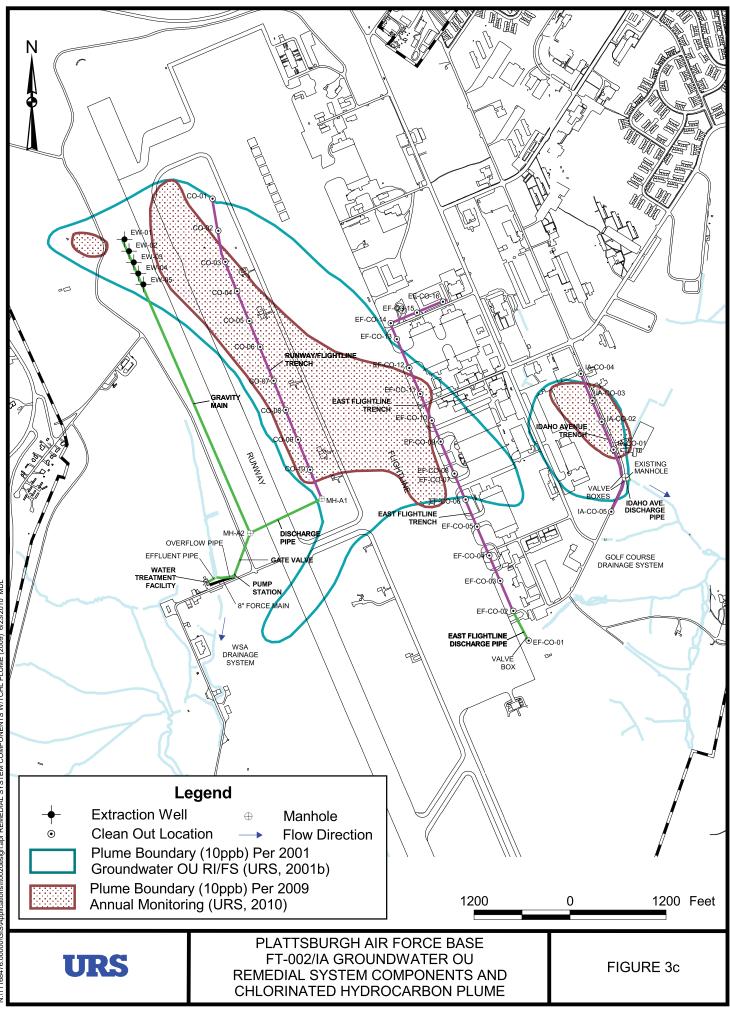


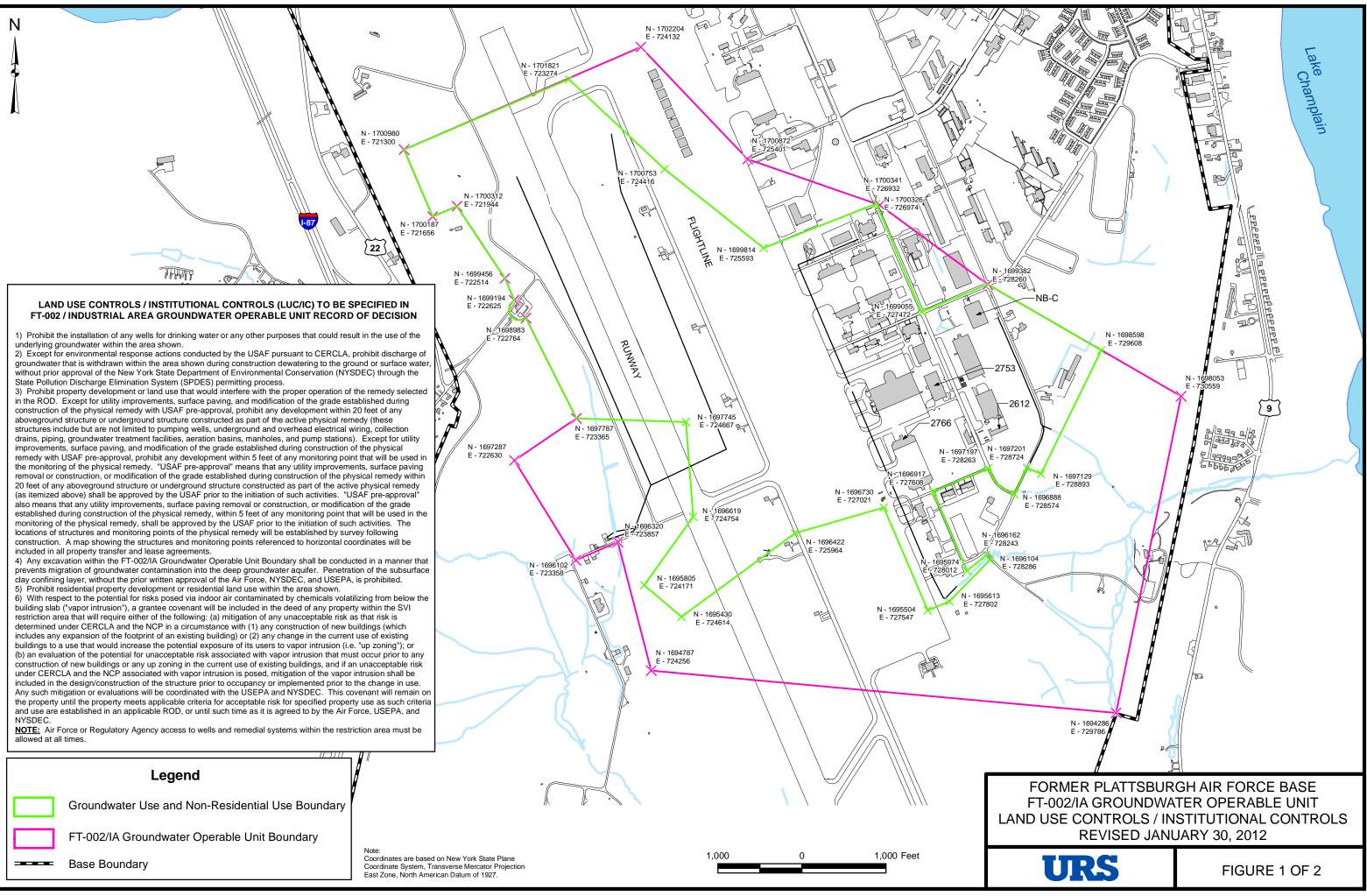
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Central Airfield CDR Exhibit 1B

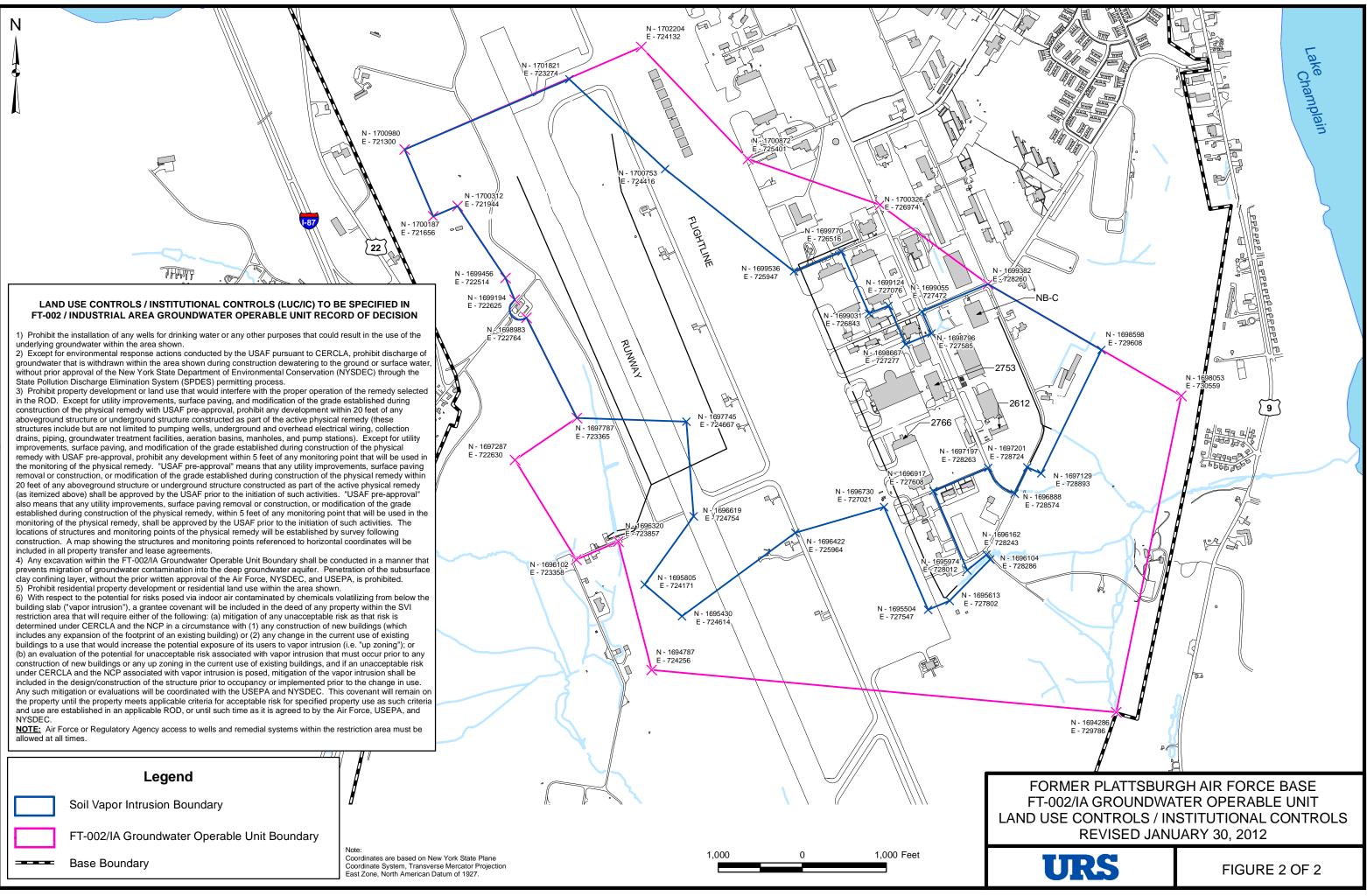


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#### Central Airfield CDR Exhibit 2-1



#### Central Airfield CDR Exhibit 2-2

# REVISED SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS) FOR CENTRAL AIRFIELD Former Plattsburgh Air Force Base (AFB), New York March 2012

# 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 40 buildings, 21 support structures, 5 navigational aids, paved areas, and various areas of open space and wooded land located on the central portion of the airfield since publication of the Plattsburgh AFB Basewide Environmental Baseline Survey (EBS).

# 1.2 Description.

The Property included in this document is located in the central portion of the former Plattsburgh AFB and consists of 40 buildings, 21 support structures, 5 navigational aids, paved areas, and various areas of open space and wooded land covering an area of approximately 812.85 acres (hereinafter referred to as the "Property"), and is shown at Attachments 1A through 1D, and 1N. The buildings and structures with their sizes and construction dates are listed in Tables 1.2A and B below. The Property also includes roads and automobile parking areas supporting the buildings. This area was consistently used for aircraft operations/support, maintenance, and material storage/distribution, since construction of the air base. Detailed historic land use for this area can be found on pages 6 through 11 of Table B-1 in the Basewide EBS.

	Table 1.21, Existing Facility Information			
		Size or	Year	
Facility Number	Usage	Quantity	Constructed	
2700 (S)	Sound Suppressor	1,300 SY	1970	
2702 (B)	Runway Lighting Vault	870 SF	1956	
2704 (B)	Emergency Generator	1,560 SF	1960	
2706 (S)	Drainage Pond Aerator	N/A	1992	
2709 (S)	Support Structure (Concrete Pad)	N/A	1964	
2710 (B)	Base Photography Laboratory	5,118 SF	1956	
2712 (B)	Base Operations	13,059 SF	1956	
2713 (S)	Vehicle Parking Compound	8,888 SY	1957	
2714 (B)	Radio Maintenance/Transient Alert	5,376 SF	1956	
2716 (B)	Squadron Operations	5,376 SF	1956	

Table 1 2	A Fristin	a Facility	Information
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	Table 1.2A, Existing Facility II	Size or	Year
Facility Number	Usage	Quantity	Constructed
2720 (B)	Fire Station (Admin)	1,595 SF	1959
2731 (S)	Training Aid (Platform)	N/A	1985
2736 (B)	Security Police Operations	7,071 SF	1956
2738 (B)	Fire Station (Admin)	7,071 SF	1956
2739 (S)	Antenna Support Structure	N/A	1970
2741 (B)	Aircraft Maintenance (Nose) Dock #1	28,046 SF	1956
2748 (B)	Fire Station	17,182 SF	1956
2749 (S)	Emergency Generator Shed	204 SF	1978
2750 (B)	Wing Headquarters	15,177 SF	1957
2752 (S)	Emergency Generator Sheds	300/100 SF	1988
2753 (B)	Aircraft Maintenance Shop	58,546 SF	1956
2754 (B)	Base Hazardous Storage	65 SF	1977
2763 (B)	Aircraft Maintenance Hangar	166,367 SF	1956
2766 (B)	Aircraft Maintenance (Nose) Dock #2	28,046 SF	1956
2768 (S)	Loading and Unloading Platform	N/A	1981
2774 (B)	Jet Engine Maintenance/Hazardous	30,720 SF	1956
	Materials Pharmacy		
2776 (S)	Antenna Support Structure	N/A	1966
2778 (B)	Avionics Maintenance Shop	24,386 SF	1956
2780 (S)	Support Structure	N/A	1984
2784 (B)	Survival Equipment Shop	8,516 SF	1956
2785 (B)	Aircraft Maintenance (Nose) Dock #4	28,046 SF	1956
2786 (B)	Group Headquarters Admin	7,090 SF	1956
2787 (B)	Communications Facility	13,588 SF	1956
2789 (S)	Deicing System Pumphouse	1 EA	1992
2790 (S)	Deicing System Tanks	2 EA	1992
2793 (B)	Aircraft Maintenance (Nose) Dock #3	28,046 SF	1956
2794 (S)	Walk-In Cooler	1 EA	1980
2795 (S)	Concrete Pad	1 EA	1965
2796 (B)	Aircraft Parts Warehouse	5,376 SF	1956
2797 (B)	Dining Hall, Detached	5,376 SF	1956
2801 (B)	Weapons Systems Maintenance Shop	24,044 SF	1956
2802 (B)	Non-Destructive Inspection Lab	4,027 SF	1956
2808 (B)	Aircraft Maintenance (Nose) Dock #5	28,046 SF	1956
2815 (B)	Aircraft Support Equipment Shop	26,500 SF	1980
2816 (P)	Aircraft Support Equipment Storage	5,816 SY	1980

# Table 1.2A, Existing Facility Information

	Table 1.2A, Existing Facility in	Size or	Year
Facility Number	Usage	Quantity	Constructed
2818 (B)	Aircraft Maintenance (Nose) Dock #6	28,046 SF	1956
2820 (B)	Jet Engine Test Cell	3,472 SF	1969
2826 (S)	Vehicle Fueling Station	264 SF	1982
2827 (B)	Snow Dock	29,700 SF	1976
2830 (B)	Security Police Ops	14,696 SF	1957
2833 (B)	Squadron Ops	6,376 SF	1957
2836 (S)	Liquid Oxygen Storage	1,500 SF	1967
2837 (B)	Aircraft Maintenance (Nose) Dock #7	28,046 SF	1956
2840 (B)	POL Ops	5,376 SF	1956
2841 (B)	Security Police CSC	5,376 SF	1956
2842 (S)	Antenna Support Structure	1 EA	1980
2890 (B)	Aircraft Maintenance (Nose )Dock #8	28,046 SF	1956
3005, 3010,	Aircraft Parking Apron	1,149,517 SY	1956
3015, 3020,			
3025, 3060,			
3065, 3070,			
3075, 3080 (P)			
3030, 3050,	Aircraft Taxiway	145,387 SY	1957
3110, 3120,			
3130, 3140,			
3150 (P)			
3160 (P)	Paved Shoulder	172,406 SY	1957
3100 (P)	Runway	392,000 SY	1956
3145 (P)	Paved Overrun (North)	33,333 SY	1960
3218 (NA)	TACAN Station	300 SF	1991
3227 (S)	Emergency Generator (Concrete Pad)	396 SF	1964
3229 (S)	Equipment Pad	53 SY	1978
3235 (NA)	Antenna Support Structure (Concrete Pad)	1 EA	1984
3236 (NA)	Aircraft Radar Station (Concrete Pad)	1 EA	1981
3283 (NA)	Visual Approach Facility	1 EA	1959
3294 (NA)	Runway Supervisory Unit (Concrete Pad)	100 SF	1991
3400 (B)	BCE Covered Storage	5,183 SF	1961
3412 (S)	Training Aid	1 EA	1980
3592 (B)	MMS Admin	504 SF	1957

# Table 1.2A, Existing Facility Information

Size or Year			
Facility Number	Usage	Quantity	Constructed/
racinty rumber	Usage	Quantity	<b>Demolished</b>
2708 (S)	C-Band Radar Meteorological Set	N/A	1967/1995
2711 (S)	Billboard	N/A	1977/1997
2715 (B)	Storage Shed	160 SF	1964/2005
2751 (S)	Monument	N/A	1975/1997
2755 (S)	Monument	N/A	1978/1997
2759 (S)	Field Maint Accumulation Point	N/A	1992/1998
2760 (S)	Maint Hangar Accumulation Point	N/A	1992/1998
2764 (B)	Emergency Generator Shed	200 SF	1979/1997
2765 (S)	Monument	N/A	1979/1997
2770 (B)	Vehicle Operations Admin	720 SF	1986/1993
2775 (S)	Electrical Substation	7,515 KV	1956/2005
2777 (S)	Deluge System Reservoir	600,000 GAL	1957/2012
2779 (B)	Deluge System Pumphouse	1,462 SF	1957/2012
2803 (B)	Warehouse	93 SF	1956/2005
2810 (B)	Vehicle Fueling Station	576 SF	1980/1995
2811 (S)	Fuel Storage Tank	5,000 GAL	1980/1995
2812 (S)	Fuel Storage Tank	5,000 GAL	1980/1995
2824 (S)	Water Tank	750K GAL	1956/2009
2825 (NA)	Beacon Light	1 EA	1957/2009
2880 (S)	Fuel Storage Tank	1,000 GAL	1983/1992
2886 (S)	Fuel Storage Tank	9,996 GAL	1956/Prior
			to 1993
2901 (S)	Hazardous Storage Shed	176 SF	1987/2005
2902 (S)	Hazardous Storage Shed	176 SF	1987/2005
3063 (S)	Guard Tower	1 EA	1980/2005
3066, 3067,	Aircraft Shelters	9,833 SF/EA	1972/2009
3068, 3069,			
3071, 3072,			
3073, 3074,			
3076 (S)			
3205 (B)	ILS Shop	720 SF	1986/1995
3216 (S)	Support Structure (Pad)	1 EA	1959/2009
3220, 3230,	Jet Fuel Pumphouse	2,026 SF/EA	1956/1996
3240, 3250,			
3260, 3270,			
3280, 3285 (S)			
3221, 3231,	Jet Fuel Systems	23-2800	1956/1996
3261, 3281,		GPM/EA	
3286 (S)			

# Table 1.2B, Former Facility Information

Facility Number	Usage	Size or Quantity	Year Constructed/ Demolished
3222, 3232,	Emergency Generators	160 SF/EA	1964/1996
3262, 3282, 3287 (S)			
3226 (S)	Septic System	1 EA	UNK/1996
3237 (S)	Transformer Pad	5 SY	1981/1996
3241, 3271	Jet Fuel Storage	14,286 BL	1956/1996
3251 (S)	Av Gas Storage	2,381 BL	1957/1996
3284 (NA)	Wind Sock	1 EA	1961/2009
3288 (S)	Emergency Generator	195 SF	1986/2009
3289 (NA)	Glide Slope Indicator	186 SF	1956/2009
3290 (NA)	Antenna Support Structure	2 EA	1980/2009
3399 (S)	Elect Substation	2,000 KV	1961/2005
3401 (S)	Septic System	1 EA	1961/1996

**Table 1.2B, Former Facility Information** 

# KEY FOR TABLES 1.2A AND 1.2B

B: BuildingS: Support StructureNA: Navigational AidP: PavementsA: 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), and the following SEBS previously completed for this property: the April 1996 SEBS for Building 2820; the October 1996 SEBS for Building 2801; the December 1996 SEBS for Building 2815; the March 1997 SEBS for Building 2774; the April 1997 SEBS for Building 2716; the April 1997 SEBS for Flightline Industrial Buildings; the July 1997 SEBS for Flightline Industrial and Administrative Buildings; the November 1997 SEBS for the Northern Aviation Support Facilities; the June 1998 SEBS for Flightline, Navigational Aids, and Miscellaneous Structures; the September 1998 SEBS for the Southern Aviation Support and Industrial Area; and the January 2000 SEBS for the Western Area. 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 in September 2009, January and June 2010, and March 2012 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 November 1995 Final Environmental Impact Statement (FEIS) for Disposal and Reuse of Plattsburgh; the December 1995 Asbestos Survey of Plattsburgh Air Force Base; the April 1997 Closure Report for Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks, and Aboveground Storage Tanks (six volumes); the April 1999 Final Underground Storage Tanks Site Characterization Report (Volumes 1 and 2); the May 2000 Aircraft Refueling System Closure Report (four volumes); the May 2000 Environmental Assessment of Alternative Land Uses (Supplement to the November 1995 FEIS); the May 2001 Supplemental Evaluation to the Basewide Environmental Baseline Survey (three volumes); the October 2001 Asbestos Assessment/Inspection at Selected Industrial Structures (two volumes); the October 2002 Land Use Controls/Institutional Controls (LUC/ICs) Management Plan for the Former Plattsburgh AFB; the March 2003 Report on Repair of Damaged Asbestos-Containing Material at Selected Industrial Structures; the November 2009 Third Five-Year Review Report for Plattsburgh AFB; the February 2005 Closure Report for Investigation/or Remediation of Miscellaneous EBS Factors - Solid/Hazardous Waste Sites, Petroleum Site, and PCB Sites; the March 2001 Site FT-002 Fire Training Area Source Operable Unit Record of Decision; the January 2005 Fire Training Area (FT-002) Source Operable Unit Operations and Monitoring Plan; the May 2003 Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Interim Record of Decision; the June 2005 Air Force Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Record of Decision (signed by the Air Force August 2005); the August 2007 Flightline (SS-004) Final Remedial Investigation Report (three volumes); the March 1998 Site SS-005 Non-Destructive Inspection Facility Soil Operable Unit Record of Decision; the March 1998 SS-006 Aerospace Ground Equipment Facility Soil Operable Unit Record of Decision; the August 2008 SS-013 Munitions Maintenance Squadron Final Record of Decision; the September 2008 Site SS-016 Nose Dock 8 Final Record of Decision; the May 2007 Site SS-016 Nose Dock 8 Confirmatory Soil Boring and Sub-Slab Soil Gas Sampling Report; the September 1992 Landfill LF-023 Source Control Record of Decision; the January 1995 LF-023 (Groundwater Surface Water and Sediment) Record of Decision; the September 2004 SS-027 Liquid Oxygen Plant NFRAP Decision Document; the December 1996 Jet Engine Test Cell (SS-029) Site Investigation Report; the September 2008 Building 2612 (SD-041) Final Remedial Investigation Report (three volumes); the September 2004 NFRAP Decision Document for the Former Weapons Storage Area Radiological Waste Investigation; the August 1994 Evaluation Report of Subsurface Conditions at the Mobil Service Station (Rt 22); the March 2009 Post-Closure Monitoring Report (for September – December 2008) for IRP Site LF-023; the October 2006 Addendum to the Report on the Idaho Avenue Groundwater Ammonia Contamination Investigation; the August 2005 Building 3288 Diesel Fuel UST Closure Report; the December 2008 Soil Vapor Intrusion Survey Data Summary Report (November 2006 – April 2007) for Industrial Area Buildings East of the Flightline Ramp;

the December 18, 2008 Technical Memorandum for the Building 2793 Soil and Groundwater Sampling Event – October 7-9, 2008; the May 2009 Supplemental Soil Vapor Intrusion Survey Data Summary Report (March – April 2008), the January 2008 Revised Supplemental Closure Report for the Washrack Area; the March 2007 Removal Action Report for the Drum Removal Area, the September 2008 Operations Summary and Progress Assessment (for 2006 – 2007) for the FT-002 Source Operable Unit, the April 2009 Operations Summary and Progress Assessment (for 2008) for the FT-002/IA Groundwater Operable Unit, the January 2009 Semi-Annual Monitoring Report for Selected Wells Upgradient from Kemp Lane; the March 2009 Sub-Slab Soil Gas and Indoor Air Sampling Results for Buildings 2763, 2766 and 2793, the April 2010 Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Draft Supplement to the January 2002 Final Proposed Plan; the May 2010 Fire Training Area (FT-002)/Industrial Area Groundwater Operable Unit Draft Record of Decision; the November 2010 Semi-Annual Operations Report (July - December 2009) and 2009 Operations Summary and Progress Assessment for the FT-002/IA Groundwater Operable Unit; the November 2010 Building 2766 Soil Vapor Extraction System Design Document; the December 2010 Industrial Area Buildings Data Summary Report for Sub-Slab Soil Vapor Survey and Indoor Air Monitoring (March 2009 thru March 2010); the January 2011 Operation and Monitoring Report (December 2009 through December 2010) for the Former Building 2753 Machine Shop Area Sub-Slab Soil Venting System; the July 2005 Final SEBS for Multiple Areas; the USEPA Letter to the AFRPA dated 29 November 2011, regarding Invocation of Dispute Resolution; the NYSDEC Letter to the AFRPA dated 1 December 2011, regarding vapor Intrusion Issues; and the AFRPA Letter to the USEPA and the NYSDEC dated February 2012 regarding the Central Airfield Area Finding of Suitability for Early Transfer and Soil Vapor Intrusion Restrictions. All documentation used for the preparation of this SEBS is available for review at the Air Force Center for Engineering and the Environment office at Plattsburgh, New York.

#### 2.3 Inspection of Properties Conducted.

VSIs were conducted in September 2009, January and June 2010, and March 2012 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, etc., which might indicate environmental concern.

## **CHAPTER 3: FINDINGS FOR CENTRAL OLD BASE 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 medical/biohazardous wastes and ordnance-related issues. Applicable environmental factors are discussed below.

# **3.2.1** Hazardous Substance, Petroleum, and Miscellaneous Material Spills/Release Incidents.

The Basewide EBS (Tables C-1 and C-2) lists several hazardous substance storage areas on this property; these locations and their status are presented in Table 3.2.1A below:

Table 5.2.1A, Hazardous Substances Storage	
Location	Comments
2710, 2714, 2715,	STW-2710, STW-2714, STW-2715, STM-2741, STM/STW-2748, STM-
2741, 2748, 2753,	2753-1/2/3 & STW-2753-1/2/3/4/5, STW-2754, STM-2763-1/2 and STW-
2754, 2763, 2774,	2763-1/2/3/4, STM/STW-2774, STW-2775, STW-2785-2, STM/STW-
2775, 2785, 2793,	2793, STM-2801-1/2/3 and STW-2801, STM/STW-2802, STM-2808,
2801, 2802, 2808,	STM-2815/STW-2815-2, STM/STW-2818, STM/STW-2820, STW-2830,
2815, 2818, 2820,	STW-2833, STM-2837, STM-2890, STW-3270, STW-3287: No concerns
2830, 2833, 2837,	noted with these hazardous material/waste factors in the Basewide EBS,
2890, 3270, 3287	previous SEBSs or during the VSI.
2759, 2760, 2785,	STW-2759, STW-2760, STW-2785-1, STW-2815-1, STW-2901, STW-
2815, 2901, 2902	2902: Each was a steel facility designed for storage of hazardous wastes.
	No concerns were noted in the Basewide EBS or previous SEBS; these
	facilities have been removed. No concerns were noted during the VSI.
2827	STM/STW-2827: Staining on floor throughout facility (a grounds
	maintenance vehicle garage) noted in Basewide EBS. All staining is a
	result of minor petroleum releases that were contained and cleaned up. No
	additional concerns were noted during the VSI.

Table 3.2.1A, Hazardous Substances Storage

The Basewide EBS (Table G-2) lists several spills or releases that are summarized in Table 3.2.1B below:

Location	Comments
2748, 2793, 2797,	SPL-2748-1/2/3/4/5, SPL-2793, SPL-2797, SPL-2802, SPL-2812, SPL-
2802, 2812, 2815,	2815-1/2; SPL-2820-1/2/3/4/5, SPL-2890, SPL-3010, SPL-3232, SPL-
2820, 2890, 3010,	3241, SPL-3281, SPL-3285: All spills are listed in both the Basewide EBS
3232, 3241, 3281,	and New York State Department of Environmental Conservation
3285	(NYSDEC) Spill Register as closed. The NYSDEC Spill register can be
	located at
	http://www.dec.ny.gov/cfmx/extapps/derexternal/index.cfm?pageid=2

#### Table 3.2.1B, Spills/Releases

Location	Comments
2700	SPL-2700: Approximately three gallons of jet fuel were released into the
2100	sanitary sewer. Investigation at the time indicated no further action
	necessary. The Basewide EBS and VSI noted no signs of contamination.
2710	SPL-2710: Unknown quantity of anhydrous ammonia; spill listed in
2710	Basewide EBS (and NYSDEC Spill Register) as closed.
2763	SPL-2763-1 through 11: All spills, except #6, #7 and #8, are listed in the
2105	Basewide EBS as closed/cleaned up. SPL-2763-6/7/8 does not include
	documentation on spill containment/cleanup, but each is fuel, less than five
	gallons, and in areas containing pavement (which would limit extent of
	spill/release. No concerns were noted during the VSI.
2787	SPL-2787-1/2: SPL-2787-1 was identified from VSI for Basewide EBS as
2101	
	a stained area from air-conditioning unit. No concerns or signs of staining
	noted during subsequent VSIs. SPL-2787-2 is listed in Basewide EBS (and NVSDEC Spill Bagister) as alaged
2700	NYSDEC Spill Register) as closed.
2789	SPL-2789: Several beads of Mercury noted on floor (leaked from a
	petrometer) of deicing fluid shed. Spill was cleaned up with a HEPA
	vacuum, Mercury was properly disposed of. No concerns noted during
0010	VSI.
2818	SPL-2818: Six to eight gallons of jet fuel were cleaned up using roller
2020	sponge and absorbent pads.
2820	On June 16, 2000, a 200-gallon jet fuel spill occurred at Building 2820
	(NYSDEC Spill #0045040) during overfilling of an underground storage
	tank. The spill has been cleaned up and closed out by NYSDEC and is
	discussed further as part of IRP Site SS-029 in Section 3.2.2.
2824	SPL-2824-1/2: Minor petroleum spills (1.5 and 1.0 gallon each) on Arizona
	Road; both spills were cleaned up.
2827	SPL-2827-1/2/3: Spills of small quantities (less than five gallons each) of
	diesel fuel, gasoline, and hydraulic fluid from maintenance of grounds
	equipment/vehicles. All three spills were cleaned up.
3020	SPL-3020-1/2: Both spills were cleaned up using absorbent materials.
3025	SPL-3025: Basewide EBS doesn't indicate how spill was cleaned up. Spill
	was two gallons of jet fuel from aircraft parked at nose dock. No concerns
	noted during the VSI.
3070, 3075, 3080	SPL-3070-1 through 81, SPL-3075-1 through 22, and SPL-3080-1 through
	13: All listed spills took place on the aircraft parking ramp. Most spills
	involved jet fuel from various aircraft operation and maintenance activities
	(SPL-3070-30/31/61/62 were hydraulic fluid leaks, SPL-3070-77 was
	Halon (used during an aircraft fire). The Basewide EBS indicates most
	spills have been closed out, but documentation is lacking for some spills.
	No concerns or signs of contamination were noted during the VSI, but the
	entire area is part of IRP Site SS-004, which is discussed in Section 3.2.2.

# Table 3.2.1B, Spills/Releases

Location	Comments
3251	SPL 3251: Unknown quantity of caustic soda from three inactive fuel
	tanks. Tanks have been removed and area has been cleaned up as part of
	aircraft refueling system closure, which is discussed in Section 3.2.5.
3592	SPL-3592-1/2: Both spills pertained to an underground storage tank (UST)
	at this location. The UST was removed, and a site characterization
	completed (see Section 3.2.5), and the spill (NYSDEC #8906522) has been
	closed out.

Table 3.2.1B, Spills/Releases

Table G-3 of the Basewide EBS lists several miscellaneous environmental factors where there may have been spills or releases.

**OTH-2774** was an acid neutralization pit located on the west side of Building 2774. The pit and 45 cubic yards of soil were excavated and removed in 1996. The excavated area was sampled for volatile and semi volatile organic compounds (VOCs and SVOCs), but there were no detections, and no further action was recommended. OTH-2774 is further detailed in the April 1997 Final Closure Report for Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks, and Aboveground Storage Tanks.

OTH-3240 is Pumphouse #3, formerly located on the west side of the aircraft parking ramp, in the south central portion of this Property, and shown at Attachment 1C. In November 1968, the pumphouse was destroyed by fire during which jet fuel may have been released. The USTs associated with Pumphouse #3 remained in use until 1994 when they were removed (the storage tanks and refueling system are discussed further in Section 3.2.5). In 2001, an investigation of the groundwater in the vicinity of Pumphouse #3 was conducted and it was concluded the petroleum contamination (approximately 11.1 parts per million (ppm) total BTEX at the source) originating from Pumphouse #3 is present, but limited in extent to within 450 feet from the pumphouse and is likely in an equilibrium state, as evidenced by the likely age of the spill and high biological activity (indicated by oxygen-depleted conditions and lack of benzene constituent). Because contaminants are not likely to migrate any further downgradient and groundwater is not likely to be utilized at this location in the future, active remediation was not recommended. The NYSDEC Region 5, Office of Environmental Quality concurred on December 4, 2001, and recommended groundwater monitoring every six months for at least two years. The initial groundwater monitoring has been completed, remaining remedial activities (monitoring) for the former Pumphouse #3 are being performed as part of the IRP Site FT-002 Fire Training Area/IA Groundwater OU (which includes this area, and is discussed in Section 3.2.2). Most recent sampling, conducted in 2008, indicate total BTEX was detected at approximately 6.9 ppm (compared to 11.1 ppm that was detected during the initial sampling event in 2001). The relevant remedial action objective is 0.02 ppm.

**OTH-3420:** The Basewide EBS indicates this area was once used as a vehicle fire training facility before being converted to a landfill. The landfill is IRP Site LF-023 and is discussed in Section 3.2.2.

In addition to the spills/releases listed above, there are two additional spills/releases:

During the construction of the IRP Site FT-002 Fire Training Area/IA Groundwater OU extraction wells and discharge pipeline, buried drums, contaminated soil and construction debris were encountered (approximately 200 feet west of Extraction Well No. 4) immediately east of a concrete pad that had reportedly been the site of a former highway maintenance facility prior to construction of the Air Force base in the 1950s. In 2003-2004, sixteen drums, 667 tons of contaminated soil (containing fuel-related compounds and pesticides), and 63.5 tons of construction debris, were excavated/removed. Five of the drums contained sludge, oily product, or pavement joint sealant; the remaining drums were corroded/empty. A geophysical survey consisting of magnetometer screening and exploratory excavations was completed and no additional drums or contaminated soil was found. Post excavation sampling results show that all contaminants of concern have been eliminated or reduced to below their respective clean up objectives, and that all sources of contamination in the soil have been removed. Groundwater impacts were also assessed and found to be minimal; this area is within the IRP Site FT002 Fire Training Area/IA Groundwater OU (discussed further in section 3.2.2 below) where remedial systems are already in place and operating to recover and treat the groundwater. No further action is recommended for this area, per the March 2007 Removal Action Report for the Drum Removal Area.

The Mobil Gas Station Area of Concern (AOC) is located off-base directly west of IRP Site LF-023, across US Route 22, and is shown at Attachments 1B, 1C, 1L, and 1N. In 1992, benzene, toluene, ethyl benzene, and xylene (BTEX) compounds were detected in monitoring well MW-23-008 and were determined to not be landfill derived. The Air Force contacted the NYSDEC, and they initiated an investigation of a possible off-base source. In April 1993, it was determined that there was BTEX contamination in the soil and groundwater downgradient of the Mobil Gas Station site. Groundwater monitoring is being conducted as part of the IRP Site LF-023 long-term monitoring program in order to assess the impact to on-base receptors, wetlands, and streams. As requested by the NYSDEC and the New York State Department of Health (NYSDOH), groundwater and soil vapor intrusion use restrictions have been placed on this area and are shown at Attachment 1L.

## 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 eleven IRP Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites; and three IRP fuel sites located on this property.

**SD-001** is the base golf course drainage system, covers an area of approximately 27.37 acres, and is shown at Attachment 1D and 1N. The drainage system is 5,900 feet long and receives surface water runoff from the ramp, flightline, aircraft, and maintenance and support facilities. After being collected in a retention pond, the storm water flows off base through the Cliff Haven housing development and into Lake Champlain. There is a possibility that past solvent and fuel

spills were transported off base via this drainage system. A draft site investigation (SI) report and decision document was completed in 1992. The SI/decision document recommended no further action based on a qualitative public health and ecological hazard assessments. Regulatory concurrence for no further action was received in June 1995.

<u>**FT-002</u>** is the former fire training area. Remedial activities are being conducted under two operable units (OUs):</u>

The FT-002 Source OU covers an area of approximately 24.46 acres, is located in the northwestern portion of the base (and shown at Attachments 1B, 1C, 1E, and 1N) and consisted of four fire training pits that were used from the mid-1950s until 1989. During training exercises, firefighters saturated the pits with water; poured off-specification jet fuel mixed with waste oil, solvents, and other chemicals, and then ignited the mixture. The site has been extensively investigated and interim removal actions have been implemented, including the installation and operation of free product recovery, soil vapor extraction, and bioventing systems. A Record of Decision for the source was signed in March 2001 to address sources of contamination. The remedy involves a combination of soil vapor extraction and bioventing of the contaminated soil, free product recovery, water table depression enabling remediation of residual product adhering to soil below the water table, hydraulic containment of the remaining source, institutional controls (shown at Attachment 1E), progress monitoring and sampling, and five-year site reviews in accordance with CERCLA Section 121(c). Free product levels and recovery rate trends, and remediation progress soil boring and sampling (conducted in 2001, 2006 and 2007) results, indicate the remedial objectives specified for the FT-002 Source OU have been accomplished. The FT-002 Source OU remediation systems were placed on "standby", in July 2008, pending confirmation (by periodic monitoring) that there is no recurrence of free product. No significant levels of free product have been detected since remediation systems were placed on "standby". Permanent shutdown, and decommissioning, of the FT-002 Source OU remediation systems, has been recommended. The Air Force will prepare a Remedial Action Completion Report to document completion pursuant to the "DoD/EPA Joint Guidance on Streamlined Site Closeout and NPL Deletion Process for DoD facilities" (anticipated to be submitted September 2012).

<u>FT-002/IA Groundwater OU</u> addresses contaminated groundwater at and downgradient from the FT-002 Source OU, and groundwater at or near six other IRP sites including SS-004, SS-005, SS-006, SS-011, SS-017, and SS-041. The FT-002/IA Groundwater OU is shown at Attachments 1B, 1C, 1D, 1F, 1G, 1N, and 1O. This OU encompasses an area of approximately 978 acres. The groundwater contamination includes chlorinated hydrocarbons and fuel-related compounds, and extends over one mile downgradient from the FT-002 source area. The groundwater contamination was investigated and remediation alternatives were evaluated in a Remedial Investigation/Feasibility Study (RI/FS), which was finalized in 2001. An Interim Record of Decision (IROD) that addresses the FT-002/IA Groundwater OU was signed by the Air Force and the USEPA in June 2003, and the physical remedy (identified below) has been constructed.

After significant discussions from 2005 through 2007 of the potential for vapor intrusion risks, the Air Force performed an evaluation of soil vapor intrusion into the industrial area within the groundwater contamination plume, which is detailed in Section 3.3.3.

The final remedy for the FT-002/IA Groundwater OU is expected to include: institutional controls (e.g., lease and deed restrictions shown at Attachments 1F) to limit the use and discharge of groundwater (shown in green at Attachment1F-1), to prohibit property development that would interfere with remedial operations, prohibit residential property development and residential land use (shown in green Attachment 1F-1), and either perform sampling to show no unacceptable risk is present, or perform mitigation measures to address the potential risk from vapor intrusion for future construction and future building modifications that could increase human exposure and new building construction (the vapor intrusion restrictions are shown in blue at Attachment 1F-2 and ); three groundwater collection trenches, (one located between the runway and flightline, one located along the eastern edge of the flightline, and one located along Idaho Avenue); extraction wells located in the plume core west of the runway; groundwater treatment systems to treat contaminated groundwater from the collection systems discharging to the WSA and Golf Course drainage systems, SVE systems to address sub surface soil gas contamination and the potential for health risks from potential soil vapor intrusion; groundwater and surface water monitoring; and five-year site reviews in accordance with Section 121(c) of CERCLA.

Construction of the physical components of the remedial action, including the SVE systems, has been completed. The groundwater portion of the remedial action has been operating since February 2005. The Building 2753 and 2766 SVE systems have been constructed and have been in operation since December 2009 and December 2010 respectively. Attachment 1G shows the extent of groundwater contamination presented in the 2001 RI/FS compared to the current extent of contamination based on the 2009 annual groundwater sampling event. There has been a significant reduction in the extent of the groundwater contamination. A Supplemental Proposed Plan and Revised ROD to document these elements have been submitted for regulatory review (April and May 2010). Regulatory comments to the Supplemental Proposed Plan have been received (July 2010) and are being addressed. The Revised ROD will be resubmitted after completion of the Supplemental Proposed Plan (Summer 2012).

<u>SS-004 Soil OU</u> is the flightline, covers an area of approximately 265.82 acres, is located in the central portion of the base, and shown at Attachments 1B, 1C, 1D, and 1N. The most prominent feature within the site is the concrete and asphalt flightline ramp, which was used for aircraft parking and refueling during the period from 1954 to 1995. An underground fuel distribution system, referred to as the Aircraft Refueling System (ARS), was also present beneath the ramp. The distribution system consisted of eight pumphouses with underground tanks located along the western edge of the flightline with lateral fuel distribution lines running underneath the ramp from west to east. The ARS was dismantled in 1996. Spills have resulted from aircraft operations and maintenance and may have migrated to soils and drainage ways along the perimeter of the ramp, particularly to the south and east. Another potential contaminant source includes aircraft exhaust particulate accumulating in the surface soils. Groundwater

contamination in the flightline (SS-004) area is being addressed and monitored as part of the Fire Training Area (FT-002)/IA Groundwater OU. The RI for this site was done in 1993, but was updated in 2003 to incorporate data collected from the ARS closure, the Fire Training Area (FT-002)/IA Groundwater OU RI/FS, the Pumphouse #3 groundwater investigation, and additional fieldwork (soil, sediment, and surface water sampling) collected in 2002. Widespread metals and polyaromatic hydrocarbon (PAH) contamination is present in the surface soils adjacent to and east of the flightline ramp. This contamination is likely the result of the combustion of fossil fuels from aircraft and service vehicles; the eastern edge of the flightline ramp is situated on the down slope and downwind side of the ramp. The contamination decreases rapidly with depth and is likely of concern only within a few inches of the ground surface. Generally, only low concentrations of chemicals were detected in subsurface soils adjacent to and beneath the flightline ramp. However, VOCs were detected in excess of standards in subsurface soils in the vicinities of former Pumphouses #2 and #3 on the western side of the ramp. The Pumphouse #3 area was investigated thoroughly (discussed in Section 3.2.1) and separately from the SS-004 RI, routine groundwater monitoring is ongoing in this area. Approximately 5,900 cubic yards of soil were removed as part of the Pumphouse #2 removal in 1996. Groundwater sampling at the former Pumphouse #2 was initiated in March 2005 (as part of the annual groundwater sampling for the Fire Training Area (FT-002)/IA Groundwater OU) and discontinued in 2008 when sampling results indicated no exceedances of groundwater standards. Surface water samples were collected as part of the RI; no detections exceeded surface water Applicable or Relevant and Appropriate Requirements (ARARs). Sediment samples were collected in the drainage ways during the initial RI and in 2002. The sediment contamination was evaluated in the Human Health Risk Assessment and Ecological Risk Assessment. No unacceptable risk is associated with human receptor exposure to the contaminated sediment. There is a potential ecological risk to avian species due to metals contamination in the surface soil; mitigation of this risk will likely be accomplished via bird population control as part of commercial air operations that are taking place at this site. A Final RI Report has been completed (2007). A Draft Proposed Plan is in progress (will be submitted summer 2012).

**SS-005** Soil OU is the former Non-Destructive Inspection (NDI) Facility, covers an area of approximately 2.26 acres, is located approximately 1,200 feet east of the flightline, and shown at Attachments 1B, 1D, 1H, and 1N. The facility was used for the non-destructive x-ray inspection of aircraft parts. Although there was evidence of spillage and/or disposal of hazardous substances at the site, chlorinated hydrocarbons and fuel-related compounds were detected in site soils and groundwater during the RI at levels only slightly above ARARs and guidance values. Groundwater contamination at this site is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU. The Risk Assessment for the SS-005 Soil OU, which did not include evaluation of a future residential use scenario, revealed that risks to human health and the environment, given the current and planned future use of the site (industrial/commercial), were within acceptable levels. The ROD for the Soil OU at this site was signed in April 1998. The remedy selected for the site was "Institutional Controls" and called for restrictions limiting development of the site to non-residential uses, prohibition of the installation of any wells that could result in the use of groundwater underlying the site, and evaluation of the institutional controls during five-year reviews of the remedy. The restrictions are shown at Attachment 1H.

SS-006 Soil OU is the former Aerospace Ground Equipment (AGE) Facility, covers an area of approximately 6.47 acres, is located approximately 600 feet east of the flightline, and shown at Attachments 1B, 1C, 1D, 1I, and 1N. The site consists of the AGE Building (#2815), at which power carts utilized on the flightline were maintained and repaired, and Building 2801, which housed the Precision Measurement Equipment Laboratory, the Weapons Systems Management and Maintenance Facility, and other flightline-related offices. Although there was evidence of spillage and/or disposal of hazardous substances at the site, chlorinated hydrocarbons and fuelrelated compounds were detected in site soils and groundwater during the RI at levels only slightly above ARARs and guidance values. The minor groundwater contamination detected was shown to be unrelated to soil contamination at the site and is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU. The Risk Assessment for the sites-006 Soil OU, which did not include evaluation of a future residential use scenario, revealed that risks to human health and the environment, given the current and planned future use of the site (industrial/commercial), were within acceptable levels. The ROD for the Soil OU at this site was signed in April 1998. The remedy selected for the site was institutional controls and called for restrictions limiting development of the site to non-residential uses, prohibition of the installation of any wells that could result in the use of groundwater underlying the site, and evaluation of the institutional controls during five-year reviews of the remedy. The restrictions are shown at Attachment 1I.

<u>SS-008</u> is the airfield lighting electrical vault (Building 2704), covers an area of approximately 0.12 acres, is located near the southeast corner of the aircraft parking ramp, and shown at Attachment 1D and 1N. This site is a fuel site subject to the Resource Conservation and Recovery Act (RCRA), with oversight being provided by the NYSDEC Region 5, Spill Response Office. After initial sampling and investigation, it was determined that contamination on this site originated from non-point sources within SS-004. A no further action decision document was issued by the Air Force in July 1991, and regulatory concurrence has been received (1997). Data from this site has been incorporated into the Site SS-004 investigative activities.

<u>SS-009</u> is the refueling system fuel valve pit, covers an area of approximately 0.03 acres, is located near the southeast corner of the aircraft parking ramp, and shown at Attachment 1D and 1N. This site is a fuel spill site subject to the RCRA, with oversight being provided by the NYSDEC Region 5, Spill Response Office. The SI concluded that contamination on this site also originated from non-point sources within SS-004. The Air Force issued a no further action decision document in August 1991, and regulatory concurrence has been received (1997). Data from this site has been incorporated into the Site SS-004 investigative activities.

<u>SS-014</u> is the Alert Area, covers an area of approximately 37.75 acres, is located on the north end of the flightline ramp, and shown at Attachment 1B and 1N. This site is a fuel spill site subject to the RCRA, with oversight being provided by the NYSDEC Region 5, Spill Response Office. Fuel spills were reported at the site. Large spills were reportedly contained and recovered, while small spills were washed into storm drains. After sampling and investigation, it

was concluded that site contamination did not pose a health hazard. A decision document recommending no further action for the site was signed by the Air Force in September 1992. In March 1997, the NYSDEC Region 5, Environmental Quality Office issued a letter concurring that no further investigative or remedial work was necessary at the site.

<u>SS-016</u> is Nose Dock 8, Building 2890, covers an area of approximately 5.56 acres, and is shown at Attachment 1B and 1N. This facility was used for aircraft corrosion control and painting. It contained a 1,956-gallon UST for the storage of spent solvents and waste strippers. This tank ruptured in 1987 with the release of 1,400 gallons of its contents, resulting in a groundwater plume extending approximately 1,400 linear feet (LF) downgradient to the southeast. Contaminants of concern include 2-butanone, methylene chloride, toluene, xylenes, ethylbenzene, trichloroethene, and acetone. Source removal has been accomplished, and a groundwater treatment system was operated from 1997 to 2007. Confirmatory soil and soil gas sampling was performed in January 2007, and indicated that the site has been cleaned up. A No Further Action ROD has been completed (September 2008).

SS-017 Soil OU is Building 2774, covers an area of approximately 2.45 acres, is located east of the flightline ramp, and shown at Attachment 1D and 1N. The site includes the immediate areas surrounding Building 2774 and 2753. Building 2774 supported aircraft engine maintenance activities, and Building 2753 served as an aircraft maintenance machine shop. An Interim Remedial Measure (IRM) was executed in 1992, during which a concrete pad (south of Building 2774) and approximately 200 cubic yards of contaminated soil surrounding the pad were removed and disposed. Subsequent investigations were implemented to evaluate the surrounding area. In February 1997, a second removal action was initiated to address soil contamination remaining following the IRM. Systems installed and operated for the removal action included soil vapor extraction (SVE), bioventing, and biosparging. The IRM implemented in 1992 and the second removal action undertaken from 1997 to 2002 are considered to have been successful in eliminating the principal threats for the SS-017 Soil OU. Soil sampling and analysis conducted to assess the progress of the removal action indicated that soil contamination was reduced to levels considered protective of human health and groundwater resources. A No Further Action ROD for the SS-017 Soil OU was signed in July 2002. Groundwater contamination under this site is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU.

**LF-022** is a former domestic waste landfill, which operated from 1959 to 1966, covers an area of approximately 18.86 acres, is located in the northwest portion of this area, and shown at Attachments 1B, 1J, and 1N. An RI was conducted in 1991, and the FS recommended the installation of a one-foot soil cap. A Proposed Plan was prepared and approved in 1992, and the ROD was signed in September 1992. Remedial construction was completed in 1994; long-monitoring began in October 1995, and will continue for 30 years. In addition to monitoring, the remedy includes institutional controls which are shown in Attachment 1JA. 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-023** is a former domestic waste landfill located west of the flightline and shown at Attachments 1B, 1C, 1K, and 1N. Remedial activities are being conducted under two OUs: a source OU (covering an area of approximately 27.18 acres), and a groundwater OU (covering an area of approximately 67.65 acres). This landfill operated from 1966 to 1981. The Basewide EBS indicates this area was once used as a vehicle fire training facility before being converted into a landfill. 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 longterm monitoring and the installation of four (4) additional wells for the groundwater OU. The Groundwater OU 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. In addition to monitoring, the remedy includes institutional controls which are shown at Attachment 1K. In addition to monitoring for landfill-derived contaminants, the program also monitors for contaminants associated with an off-base plume intruding upon base property from a private gas station located west of the landfill (see discussion of the Mobil Gas Station Area of Concern in Section 3.2.1 above).

<u>SS-027</u> is the former liquid oxygen (LOX) plant (Building 3400), covers an area of approximately 3.09 acres, is located in the western portion of the base, and shown at Attachments 1B, 1C, and 1N. The LOX plant ceased operations in approximately 1963 and was converted to a warehouse. Investigations did not reveal any soil contamination above to be considered (TBC) values, and trichloroethylene was the only compound found in groundwater, but also below ARAR and TBC levels. The Draft Final SI, which recommends no further action, was completed in July 2002, and a No Further Action Decision Document was issued by the Air Force in September 2004.

**SS-029** Soil OU is the Jet Engine Test Cell, covers an area of approximately 1.18 acres, is located along the central portion of the east edge of the aircraft ramp, and shown at Attachments 1B, 1C, and 1N. A preliminary assessment was completed in 1992 and recommended additional investigation because of reported spills at this location. An SI was completed in 1996. Results of soil and groundwater analysis show no evidence of petroleum contamination associated with jet fuel spills. Soil samples were found to contain the organic chemicals methylene chloride, acetone, trichloroethene, toluene, three phthalate compounds, and nine polycyclic aromatic hydrocarbon compounds. None of these chemicals were present at concentrations that exceed regulatory limits. Four metals (arsenic, barium, chromium, and lead) were detected in the soil samples, all at concentrations below NYSDEC technical guidance values. Groundwater contamination at the site is being addressed as part of the Fire Training Area (FT-002)/IA Groundwater OU. Human health risk calculations were performed to evaluate the risks associated with human exposure to contaminated media. No unacceptable carcinogenic or noncarcinogenic human health risk is associated with exposure to chemicals detected at the site, and the SI report recommended no further action. Regulatory concurrence with the SI report has been received (1997). However, on June 16, 2000, a 200-gallon jet fuel spill occurred at Building 2820 (NYSDEC Spill #0045040) during overfilling of an underground fuel tank by the

building tenant (Wood Group Turbines, Inc.); 310 tons of soil were removed and disposed of off base. Subsequent investigation of the area indicated no additional concerns, and the spill has been closed out by NYSDEC.

### 3.2.3 Oil/Water Separators (and Grease Traps/Silver Recovery Units).

According to Tables F-1 and F-3 of the Basewide EBS, there have been several oil/water separators (OWSs), grease traps/silver recovery units, and other waste water systems associated with this property. Closure reports have been completed for OWSs removed from Buildings 2700, 2763, 2815, and 3400, as part of the April 1997 Final Closure Report for Removal of Underground Storage Tanks, Oil/Water Separators, Septic Tanks and Aboveground Storage Tanks (six volumes). Site characterizations have been completed for OWS locations associated with Buildings 2748, 2753, 2763, 2785, 2818 and 2827, as part of the April 1999 Final Site Characterization Report of Underground Storage Tanks (and Oil/Water Separators). These reports have been submitted to the NYSDEC Region 5, Spill Response Office. A summary of the systems associated with this property is presented in Table 3.2.3 below:

Location	Comments
2700	OWS-2700: OWS has been removed. No concerns noted in Basewide
	EBS, the previous SEBS or during the VSI.
2710	SRU-2710: The silver recovery units at this building have been removed
	per previous SEBS. No concerns noted in the Basewide EBS, previous
	SEBS or during the VSI.
2748	OWS-2748-1/2/3: Per the previous SEBS, only two OWSs were associated
	with Building 2748; only one OWS is present (installed 1994 as
	replacement for previous unit). Site characterization has been completed
	for both locations; total volatile organic compound (VOC) groundwater
	contamination was less than 1 ppb and total semi-volatile organic
	compound (SVOC) groundwater contamination was 26 ppb. No concerns
	noted during the VSI.
2753	OWS-2753-1/2: Both oil/water separators have been removed. Site
	characterization of OWS-2753-2 detected no contamination; OWS-2753-1
	was not characterized, as the area was part of IRP Site SS-017 (see Section
	3.2.2). No concerns were noted during the VSI.

Table 3.2.3, Oil/Water Se	eparators, Grease Tra	ps, and Silver Recovery Units
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Location	Comments
2763	OWS-2763-1/2/3: All three OWSs have been removed. Closure/site
	characterization data for OWS-2763-1/2 indicated all contamination was
	below action levels. Groundwater sampling done during the removal of
	OWS-2763-3 indicated total VOC contamination of approximately 76 ppb,
	primarily chlorinated solvents (approximately 59 ppb total). This area is
	within the IRP Site FT-002 Groundwater Operable Unit (see Section 3.2.2).
	During the VSI, two new OWSs (installed approximately 1999) were noted.
	One is in the northeast portion of the building, along the east wall; and the
	other is in the southwest portion of the building, along the west wall. The
	OWS appeared to be very clean. There were no concerns noted during the
	VSI.
2774	OWS-2774-1/2: Both OWSs have been removed, and site characterization
	has been completed. Characterization results for OWS-2774-1 indicated
	slight exceedances in the groundwater for benzene, dichlorobenzenes, and
	phenols (total VOCs, approximately 350 ppb and total SVOCs,
	approximately 170 ppb). There were no exceedances associated with
	OWS-2774-2. This area is within the IRP Site FT-002 Fire Training
	Area/IA Groundwater OU (see Section 3.2.2). No concerns were noted
	during the VSI.
2778	GT-2778: Was identified in as-built drawings, but not found during
	Basewide EBS, previous SEBS, or subsequent VSI. Grease trap appears to
	have been removed. No concerns were noted during VSI.
2785	OWS-2785: Unit is still in place. Site characterization showed benzene
	and xylene at 1.0 and .2 ppb, respectively. No concerns were noted in
	Basewide EBS, the previous SEBS, or during the VSI.
2797	GT-2797: Grease trap supported kitchen/dining facility at Building 2797.
	No concerns noted in Basewide EBS, previous SEBS, or during the VSI.
2802	SRU-2802 was removed, per VSI. No concerns were noted during the VSI.
2808	OWS-2808: OWS was identified from building drawings, but not found
	during Basewide EBS, previous SEBS, or subsequent VSI. No concerns
	were noted during the VSI.
2815	OWS-2815: OWS was removed; per the closure report, soil and
	groundwater sampling show no exceedances of New York State
	Groundwater Standards or recommended soil cleanup objectives. No
	concerns were noted during the VSI.
2818	OWS-2818-1/2: Both OWSs have been removed. Site characterization
	detected no contamination at OWS-2818-2. Groundwater contamination
	detected at OWS-2818-1 consisted of SVOCs only, totaling approximately
	125 ppb. No concerns were noted during the VSI.

## Table 3.2.3, Oil/Water Separators, Grease Traps, and Silver Recovery Units

Location	Comments
2820	OWS-2820: This unit is still in place and is currently in use (by the
	building tenant, Wood Group Gas Turbines). This area is part of IRP Site
	SS-029 (see Section 3.2.2). No concerns were noted during the VSI.
2827	OWS-2827: The OWS is still in place and is currently in use (by the airport grounds maintenance department). Site characterization of the OWS location found .2 ppb toluene in the groundwater; no other contamination was detected. No concerns were noted during the VSI.
3400	OWS-3400: This OWS has been removed. The closure report indicates that trichloroethylene was detected in the soil. This is further addressed as part of IRP Site SS-027, which has been closed out as requiring no further action (and is discussed in Section 3.2.2). No concerns were noted during the VSI.

#### Table 3.2.3, Oil/Water Separators, Grease Traps, and Silver Recovery Units

#### 3.2.4 Radioactive and Mixed Wastes.

Per Section 3.3.8 of the Basewide EBS, radioactive sources were used and/or stored on this Property. No radioactive materials or wastes are known to have been disposed of on this Property. X-ray equipment was operated in Building 2802 (the Non-Destructive Inspection Shop); Cesium-137 and Plutonium-239 were used at Building 2801 (the Precision Measurement Equipment Laboratory) for equipment calibration; the x-ray equipment and radioactive sources have been removed. No concerns with these activities or locations were noted in the Basewide EBS.

#### 3.2.5 Storage Tanks and Petroleum Handling Facilities.

According to Tables E-1 through E-4 of the Basewide EBS, there are several storage tanks and petroleum handling facilities associated with the Property. All but three underground storage tanks (located near Buildings 2820 and 2827) have been removed; the UST at Building 2820 is being used by the building tenant, and the USTs at Building 2827 are being used by the airport grounds maintenance department. An aircraft refueling and fuel distribution system has also been removed. Most removal activities took place during the 1994-1997 time frame and are documented in the April 1997 Closure Report for Removal of Underground Storage Tanks and Aboveground Storage Tanks (6 volumes), the April 1999 Site Characterization Report of Underground Storage Tanks, and the May 2000 Aircraft Refueling System Closure Report (4 volumes). These reports have been submitted to the NYSDEC Region 5, Spill Response Office. In addition, numerous aboveground storage tanks have been installed (by tenants) throughout this property since the Basewide EBS. All storage tanks on this property are maintained by and the responsibility of the Clinton County Airport and/or their tenants. A summary of the storage tanks (and the aircraft refueling system) associated with this property is presented in Table 3.2.5 below:

Location	Comments
2700	A 5,000-gallon jet fuel AST was removed in 1996. No concerns were noted
	during the VSI.
2704	UST-2704, AST-2700: UST-2704 was a "bermed" diesel fuel tank that was
	replaced in 1996 by a 500-gallon, double-walled AST. In addition, AST-
	2700 is a 90-gallon diesel fuel "day" tank located within the generator
	inside the building. No concerns were noted in the Basewide EBS, the
	previous SEBS, or during the VSI.
2712	A 275-gallon diesel AST seated within a concrete dike. No concerns were
	noted in the Basewide EBS, previous SEBS, or during the VSI. In 1999, a
	275-gallon abandoned diesel fuel UST and approximately 110 cubic yards
	of soil were removed. Post removal site characterization indicated one soil
	exceedance (Benzo(a)pyrene at 42 ppb), but no groundwater exceedances.
	A closure report has been completed and submitted to NYSDEC Region 5.
2716, 2736, 2738,	Each location had a 500-gallon, double-walled heating fuel AST (ASTs at
2748, 2786, 2802	2716, 2748, and 2786 were installed in 1998; ASTs at 2736, 2738, and 2802
	were installed in 2002). During the January 2010 VSI, it was noted that
	only the AST at 2748 is still present and the other five ASTs have been
	removed. No concerns were noted during the VSI.
2749	AST-275 is a 275-gallon diesel AST seated within a concrete dike. No
	concerns were noted in the Basewide EBS, previous SEBS, or during the
	VSI.
2752	Three ASTs (2752-1/2/3) and one UST (UST-2752) are associated with the
	two generators supporting Building 2750. AST-2752-2/3 are 200- and 75-
	gallon diesel tanks mounted internal to the east generator. AST-2752-1 was
	a 275-gallon diesel AST that supported the west generator and was replaced
	in 1988 by a 1,000-gallon UST (UST-2752). UST-2752 was removed in
	1996. The April 1997 closure report shows VOC contamination in the soil
	and groundwater, but below cleanup levels. No concerns were noted during
0750	the VSI.
2753	AST-2753-1/2: Two 275-gallon heating fuel tanks were located here in
	1996, but removed in 1997. A 2,000-gallon, double-walled heating fuel
	AST was installed in 1998, but has been removed as of the January 2010
07(2	VSI. No concerns were noted during the VSI.
2763	AST-2763 was a 10,000-gallon AST inside Building 2763 that stored
	detergent for aircraft washing; tank has been removed (approximately 1999)
	per the VSI. In addition, a 1,000-gallon, double-walled heating fuel AST
	was installed in 1998, but has been removed as of the January 2010 VSI.
2764	No concerns were noted during the VSI.
2764	AST-2764 was a 275-gallon diesel fuel AST and was removed in 1995. No
	concerns were noted during the VSI.

Location	Comments
2774	UST-2774: The Basewide EBS indicated a 500-gallon jet fuel UST may have been present on south side of the building. Review of storage tank records indicates this tank was a 550-gallon UST located on the west side of the building and was removed in the early 1990s (prior to 1994). A site assessment was completed in September 1995 (and submitted to NYSDEC Region 5) and indicated no contamination present. In addition, a 2,000- gallon, double-walled heating fuel AST was installed in 1998, but has been
	removed as of the January 2010 VSI. No concerns were noted during the VSI.
2779	AST-2779-1/2/3/4: Four diesel fuel ASTs support pumps for the deluge fire suppression system that supports Building 2763 (main hangar). Deluge system/Building 2779 was upgraded in 2000 and consisted of a 1,000- gallon AST, four 275-gallon ASTs, and one 50-gallon AST. All ASTs contain diesel fuel. Building 2779 and all ASTs were demolished/removed in January 2012. No concerns noted during VSI.
2774	UST-2774: The Basewide EBS indicated a 500-gallon jet fuel UST may have been present on south side of the building. Review of storage tank records indicates this tank was a 550-gallon UST located on the west side of the building and was removed in the early 1990s (prior to 1994). A site assessment was completed in September 1995 (and submitted to NYSDEC Region 5) and indicated no contamination present. In addition, a 2,000- gallon, double-walled heating fuel AST was installed in 1998, but has been removed as of the January 2010 VSI. No concerns were noted during the VSI.
2784, 2801	Each location has a 1,000-gallon, double-walled heating fuel AST; the ASTs were installed in 1999, but both ASTs have been removed as of the January 2010 VSI. No concerns noted during the VSI.
2790	AST-2790-1/2: Two 25,000-gallon fiberglass ASTs within a concrete dike. ASTs were used for storage of deicing fluid and are still in place, but not in use. No concerns were noted during the VSI.
2811, 2812	UST-2811-A-1/A-2 and UST-2812-A-1/A-2: Two 6,000-gallon USTs (replaced two predecessor 5,000-gallon USTs). One tank stored jet fuel and the other stored gasoline; both tanks were removed in 1996. Soil and groundwater sampling conducted during the tank removal showed no soil contamination above cleanup levels; groundwater contained BTEX at 26.5 ppb total (this area is part of the IRP Site FT-002 groundwater operable unit and is discussed in Section 3.2.2). No concerns were noted during the VSI.
2815	AST-2815-1/2: Two 5,000-gallon diesel fuel ASTs were identified in the Basewide EBS based on historical records and appear to have been replaced by UST-2811/2812. In addition, a 1,000-gallon, double-walled heating fuel AST was installed in 1998, but has been removed as of the January 2010 VSI. No concerns were noted during the VSI.

Location	Comments
2820	UST-2820-A/B/C/D: UST-2820-A was a 500-gallon heating fuel tank and
2020	has been removed. UST-2820-B was a 5,000-gallon jet fuel tank and was
	replaced by UST-2820-C. UST-2820-C is a 6,000-gallon, double-walled jet
	fuel storage tank, and was removed in December 2009. UST-2820-D is a
	550-gallon, double-walled tank supporting an oil/water separator and is still
	in use, by the building tenant (the Wood Group). This area has been
	investigated as IRP Site SS-029 (no further action required) and is
	discussed further in Section 3.2.2. In addition, three ASTs are also present;
	two are 275-gallon heating tanks and the other is a 10,000-gallon jet fuel
	storage tank. No concerns were noted during the VSI.
2827	UST-2826-A-1/A-2 and B-1/B-2: Two 6,000-gallon, double-walled USTs
2027	for storage of gasoline and diesel fuel. UST-2826-A-2 and B-2 replaced
	two predecessor USTs and are still in use by the airport in support of
	grounds maintenance. Site characterization was completed in 1995 and
	found no contamination in the groundwater above action levels. In
	addition, an underground 9,000-gallon propane tank (OST-2827) is also still
	in use. No concerns were noted during the VSI.
2836	OST-2836-1/2/3/4: Two 2,000-gallon and two 5,000-gallon liquid oxygen
	and liquid nitrogen tanks; all tanks have been removed. No concerns were
	noted during the VSI.
2886	AST-2886 was a 10,000-gallon heating fuel tank and has been removed.
	No concerns were noted during the VSI.
2890	UST-2890 was a 1,975-gallon sump tank. Tank ruptured in 1987, was
	closed in place initially, but removed in 1999, and is addressed as IRP Site
	SS-016 (see Section 3.2.2).
3070	Aboveground fuel farms: There are two aboveground fuel farms within the
	southern portion of the aircraft parking ramp; located west of Building 2714
	(installed approximately 2001) and west of Building 2766 (installed
	approximately 2006). Each fuel farm contains three 20,000-gallon jet fuel
	ASTs and one 3,000-gallon gasoline AST. No concerns were noted during
	the VSI.
3218	UST-3218 and AST-3218: UST-3218 was a 550-gallon diesel fuel tank and
	was removed in 1996; no contamination was found during post excavation
	sampling. AST-3218 is a 50-gallon diesel generator fuel tank. No concerns
	were noted during the VSI.
3227	AST-3227-1/2: AST-3227-1 was a 275-gallon diesel fuel tank and was
	removed in 1996; there were no signs of contamination during AST
	removal. AST-3227-2 was a portable generator internal fuel tank (size is
	unknown); the generator has been removed. There were no concerns with
	either location during the VSI.

Location	Comments
3220, 3230, 3240,	UST-3221-A through G, UST-3231-A-G, UST-3241-A-G, UST-3251-A
3250, 3260, 3270,	through C, UST-3261-A-G, UST-3271-A through G, UST-3281-A through
3280, 3285	G, UST-3288-A through G (52 USTs total): These tanks were all jet fuel
5200, 5205	USTs that supported the former aircraft refueling system and were
	organized around eight pumphouses formerly located along the west side of
	the aircraft parking ramp. Pumphouse # 4 (3250) had two 50,000-gallon
	and one 2,000-gallon UST and all other pumphouses had six 50,000-gallon
	USTs and one 2,000-gallon UST at each location. All USTs, pumphouses,
	associated piping, and approximately 17,350 cubic yards of soil were
	removed in 1993-1996. Site sampling/characterization was performed and
	a closure report completed in May 2000. See discussion of the Aircraft
	Refueling System immediately following this table.
3222, 3232, 3262,	AST-3222, AST-3232, AST-3262, AST-3282, AST-3287: Each AST was a
3282, 3287	240-gallon internal diesel fuel tank for emergency power generators that
	supported the refueling system pumphouses (Nos. 1, 2, 5, 7 and 8). All
	tanks, generators, and buildings were removed as part of the aircraft
	refueling system closure.
3220, 3230, 3240,	UST-3221-A through G, UST-3231-A-G, UST-3241-A-G, UST-3251-A
3250, 3260, 3270,	through C, UST-3261-A-G, UST-3271-A through G, UST-3281-A through
3280, 3285	G, UST-3288-A through G (52 USTs total): These tanks were all jet fuel
	USTs that supported the former aircraft refueling system and were
	organized around eight pumphouses formerly located along the west side of
	the aircraft parking ramp. Pumphouse # 4 (3250) had two 50,000-gallon
	and one 2,000-gallon UST and all other pumphouses had six 50,000-gallon
	USTs and one 2,000-gallon UST at each location. All USTs, pumphouses,
	associated piping, and approximately 17,350 cubic yards of soil were
	removed in 1993-1996. Site sampling/characterization was performed and a closure report completed in May 2000. See discussion of the Aircraft
	Refueling System immediately following this table.
3288	A 275-gallon diesel fuel AST; the tank was in place, and no concerns were
5200	noted in the Basewide EBS or previous SEBS. The tank has since been
	removed. During a previous VSI and subsequent exploratory excavation, a
	UST was discovered. Subsequent review of as-builts indicated a 275-gallon
	diesel fuel UST was originally installed during construction of the building
	(approximately 1956). Tank and approximately 3 cubic yards of soil have
	been removed, and site closure report recommending no further action has
	been submitted to NYSDEC Region 5. No concerns were noted during the
	VSI.

Location	Comments
3400	AST-3400, UST-3400: UST-3400 was a 500-gallon heating fuel tank
	removed in 1990; no contamination was noted during removal or in the
	1999 site characterization report. AST-3400 was a 500-gallon heating fuel
	tank that was removed in 1995; no contamination was noted in the April
	1997 closure report. No concerns were noted during the VSI.
3592	UST-3592 was a 550-gallon heating fuel tank that was removed in 1990.
	Basewide EBS identifies two spills associated with this tank (SPL-3592-
	1/2; see Section 3.2.1) and indicates this tank may have leaked. The 1999
	site characterization report noted only trace VOCs (less than 1 ppb total)
	and SVOCs (less than 5 ppb total) in the groundwater, and the spill
	(NYSDEC #8906522) has been closed out. No concerns were noted during
	the VSI.

Aircraft Refueling System (POL-1000-1/2/3, POL-1000-6, POL-3221/3231/3241/3251/3261/ 3271/3281/3286): An aircraft fuel distribution system was operated on this property from the 1950s until base closure in 1995, dismantled in 1996, and officially closed in 2000. The refueling system consisted of eight pumphouses with underground storage tanks (identified and discussed in Table 3.2.5 above) located along the western edge of the aircraft parking ramp with 22 lateral fuel distribution lines running underneath the ramp from west to east. The system also included a bulk fuels storage area east of the airfield (and this property) and fuel transfer pipelines that connected the bulk fuels storage area to the pumphouses and lateral fuel distribution lines under the aircraft parking ramp. The Aircraft Refueling System is shown at Attachment 1L. The pumphouses, all tanks, and pipelines along the west and south edge of the ramp have been removed. The fuel laterals under the ramp and the sections of pipeline under aircraft pavement were filled with grout. The section of pipeline between the bulk fuels storage area and the flightline was cleaned, and closed in place. Sampling and investigation of each component are detailed in the May 2000 Aircraft Refueling System Closure Report. Additional investigation of Pumphouse #3 was completed in 2001 (see Section 3.2.1). The Aircraft Refueling System has also been evaluated as part of the RI for IRP Site SS-004 (see Section 3.2.2).

## 3.2.6 Pesticides.

No pesticides are known to have been stored on this property. Pesticides were applied in accordance with manufacturer's guidance, and no release above action levels is known to have occurred on the Property, 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 that 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 lead-based paint (high-priority facilities) and radon. Applicable disclosure resources are discussed below.

#### 3.3.1 Asbestos.

A limited Basewide Asbestos Survey has been completed and is summarized in Table H-1a of the Basewide EBS. A follow-up Asbestos Assessment/Inspection Report (2 volumes) was completed in October 2001. Repairs of deteriorated friable asbestos were made and documented in the March 2003 Report on Repair of Damaged Asbestos-Containing Material (ACM) at Selected Industrial Structures. A summary of all facilities with ACM and the ACM condition is presented in Table 3.3.1 below:

Comments			
One of three homogeneous areas tested contains ACM (cove base mastic).			
No concerns were noted during the VSI.			
Five homogeneous areas contain ACM: carpet mastic, floor tile, pipe			
nsulation, and mudded fittings. The October 2001 assessment noted			
lamaged pipe insulation in the mechanical room. The damaged ACM was			
epaired per the 2003 repair report. No concerns were noted during the			
/SI.			
Eleven homogeneous areas contain ACM: floor tile, mastic, pipe			
nsulation, window caulking, and mudded fittings in Room 18, and			
lamaged window caulking. The damaged ACM was repaired per the 2003			
epair report. No concerns were noted during the VSI.			
Swelve homogeneous areas contain ACM: floor tile, mastic, pipe			
nsulation, and mudded fittings. No concerns were noted during the VSI.			
The only ACM present was white grout for green wall tile. No concerns			
vere noted during the VSI.			
Two homogeneous areas contain ACM: floor tile. No concerns were noted			
luring the VSI.			
Sixteen homogeneous areas contain ACM: floor tile, mastic, pipe			
nsulation, mudded fittings, and transite board. No concerns were noted			
luring the VSI.			
Swenty-one homogeneous areas contain ACM: floor tile, mastic, pipe			
nsulation, mudded fittings, and transite board. The October 2001			
ssessment noted damaged mudded fittings in Rooms 7 and 20. The			
lamaged ACM was repaired per the 2003 repair report. No concerns were			
oted during the VSI.			

 Table 3.3.1, Asbestos-Containing Materials (ACM)

Location	Table 3.3.1, Asbestos-Containing Materials (ACM)         Comments
2741	Seven homogeneous areas contain asbestos, including two types of floor
2771	tile, two sizes of mudded pipe fitting insulation, and three types of pipe
	insulation. No concerns were noted during the VSI.
2748	Twelve homogeneous areas contain ACM: floor tile, mastic, pipe
2740	insulation, mudded fittings, glue-on ceiling tile, and exterior siding. The
	October 2001 assessment noted deteriorated pipe insulation and ceiling tile
	in Room 22. No deteriorated ACM was seen during the VSI (this section of
	the building has been recently renovated).
2749	The only ACM present is the insulation for the generator exhaust pipe. No
2749	concerns were noted during the VSI.
2750	Ten homogeneous areas contain ACM: floor tile, mastic, pipe insulation,
2750	and furnace gasket. The October 2001 assessment noted deteriorated water
	pipe insulation in the mechanical room. The insulation is friable per the
	assessment report, but is contained within the mechanical room, and the
	building is unoccupied. The damaged ACM is still present per the VSI.
2753	Twenty-six homogeneous areas contain asbestos, including ten types of
2,00	floor tile, ten types of mastic for floor tile, four sizes of mudded pipe fitting
	insulation, and two sizes of pipe insulation. No concerns were noted during
	the VSI.
2763	Fifty-three homogeneous areas contain asbestos, including eighteen types of
	floor tile; twenty-one types of mastic for floor, ceiling, and wall tiles;
	building exterior tar coating; transite board; five sizes of mudded pipe
	fitting insulation; six sizes of pipe insulation; and hot water tank insulation.
	No concerns were noted during the VSI.
2766	The only ACM present is pipe insulation and mudded fittings, both of
	which were noted as damaged in the October 2001 assessment, but appear
	to have been repaired or removed. No concerns were noted during the VSI.
2774	Fifteen homogeneous areas contain ACM, including seven types of floor
	tile, mastic and grout for floor tile, five types of thermal system insulation
	(TSI), and sprayed-on exterior building insulation. No concerns were noted
	during the VSI.
2778	Thirty-three homogeneous areas contain asbestos, including nine types of
	floor tile, cove base mastic, nine types of mastic for floor tile, transite
	board, duct insulation, four sizes of mudded pipe fitting insulation, four
	sizes of pipe insulation, and four types of hot water tank insulation. The
	October 2001 assessment noted deteriorated insulation and mudded fittings
	in several areas. The damaged ACM has been repaired per the 2003 repair
0770	report. No concerns were noted during the VSI.
2779	Two homogeneous areas contain asbestos and include block pipe and block
	fitting thermal insulation. No concerns were noted during the VSI.

Table 3.3.1,	Asbestos-	Containing	Materials	(ACM)
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Location	Comments
2784	
2704	Twelve homogeneous areas contain asbestos, including two types of floor tile, transite board, duct insulation, three sizes of mudded pipe fitting
	insulation, three sizes of pipe insulation, and two types of hot water tank insulation. The October 2001 assessment noted damaged insulation and
	6
	mudded fittings in several locations, but appears to have been repaired or
0705	removed. No concerns were noted during the VSI.
2785	Twenty-seven homogeneous areas contain asbestos, including eleven types
	of floor tile, ceramic wall tile grout, nine types of mastic for floor tile, two
	types of mudded pipe fitting insulation, two types of pipe insulation,
	window putty, and floor coating. The October 2001 assessment noted that
	the floor coating was deteriorated, but appears to have been removed. No
	concerns were noted during the VSI.
2786	Eleven homogeneous areas contain asbestos, including two types of floor
	tile, two types of mastic for floor tile, transite board, duct insulation, two
	sizes of mudded pipe fitting insulation, two sizes of pipe insulation, and hot
	water tank insulation. The VSI noted damaged floor tile. The floor tile is
	non-friable and not hazardous, and the building is unoccupied. No other
	concerns were noted during the VSI.
2787	Twelve homogeneous areas contain asbestos, including three types of floor
	tile, three types of mastic for floor tile, transite board, mudded pipe fitting
	insulation, two types of pipe insulation, and two types of tank covering
	insulation. The October 2001 assessment noted deteriorated insulation and
	mudded fittings in Room 4 and 22. The damaged ACM has been repaired
	per the 2003 repair report. No concerns were noted during the VSI.
2793	Four homogeneous areas contain asbestos, including ceramic floor tile grout
	and three types of pipe and fitting insulation. No concerns were noted
	during the VSI.
2796	Three homogeneous areas contain asbestos, including mudded pipe fitting
	insulation and two sizes of pipe insulation. No concerns were noted during
	the VSI.
2797	Ten homogeneous areas contain asbestos, including two types of floor tile,
	four types of mastic for carpet and floor tile, mudded pipe fitting insulation
	and pipe insulation. The October 2001 assessment noted deteriorated pipe
	insulation and mudded fittings in Rooms 5, 7, 14, and 15. The damaged
	ACM has been repaired per the 2003 repair report. The VSI noted damaged
	floor tile. The floor tile is non-friable and not hazardous, and the building is
	unoccupied. No other concerns were noted during the VSI.
2801	Twenty homogeneous areas containing ACM were identified and include
	eleven types of TSI, six types of floor tile, two types of mastic for floor tile,
	and one type of mastic for carpet. No concerns were noted during the VSI.
<u> </u>	

## Table 3.3.1, Asbestos-Containing Materials (ACM)

Location	Comments
2802	Six homogeneous areas contain asbestos, including two types of floor tile,
2002	mastic for floor tile, heat exchanger insulation, and two types of pipe
	insulation. The October 2001 assessment noted damaged floor tile. The
	floor tile is non-friable and not hazardous, per the assessment report.
	During the VSI, some of the floor tile appeared to be buckled or loose; the
	building is unoccupied. No other concerns were noted.
2808	Ten homogeneous areas contain asbestos, including three types of floor tile,
	two types of floor tile mastic, two types of mudded pipe fitting insulation,
	and three types of pipe insulation. No concerns were noted per the VSI.
2815	Six homogeneous areas contain ACM and include three types of floor tile,
	two types of floor tile mastic, and stair treads. No concerns were noted
	during the VSI.
2818	Fourteen homogeneous areas contain asbestos, including window caulk,
	seven types of floor tile, grout for ceramic wall tile, mastic for floor tile,
	mudded pipe fitting insulation, and three types of pipe insulation. The VSI
	noted damaged floor tile. The floor tile is non-friable and not hazardous,
	and the building is unoccupied. No other concerns noted during the VSI.
2820	Six homogeneous areas containing ACM have been identified and include
	three types of thermal system insulation, floor tile, and mastic for floor tile.
	No concerns were noted during the VSI.
2830	Nine homogeneous areas contain ACM: four types of floor tile, transite
	board, two sizes of mudded fittings, and two sizes of pipe insulation. No
	concerns noted during the VSI.
2833	Four homogeneous areas contain ACM: three types of floor tile and mastic
	for floor tile. The October 2001 assessment noted a small area of damaged
	floor tile. The floor tile is non-friable and not hazardous, per the
	assessment report. The damaged floor tile was still present during the VSI,
	the building is unoccupied. No other concerns were noted.
2837	Four homogeneous areas contain ACM: mudded pipe fittings, two types of
	pipe insulation and window caulk. No concerns were noted during the VSI.
2840	Twelve homogeneous areas contain ACM: five types of floor tile, mastic
	for floor tile, two sizes of mudded pipe fittings, two sizes of pipe insulation,
	and two types of underlayment. No concerns noted during the VSI.
2841	Six homogeneous areas contain ACM: two types of floor tile, two types of
	mastic for floor tile, mudded pipe fittings, and pipe insulation. The October
	2001 assessment noted damaged insulation in the bathroom and mechanical
	room. This damaged ACM has been repaired per the 2003 repair report.
	The VSI noted damaged floor tile. The floor tile is non-friable and not
	hazardous, and the building is unoccupied. No other concerns were noted
	during the VSI.

## Table 3.3.1, Asbestos-Containing Materials (ACM)

Location	Comments
2890	Six homogeneous areas contain ACM: window caulk, two types of floor tile, two types of mastic for floor tile, and pipe insulation. The VSI noted damaged floor tile. The floor tile is non-friable and not hazardous, and the building is unoccupied. No other concerns were noted during the VSI.
3288	Two of the four homogeneous areas tested contain ACM: transite board and exhaust insulation. The October 2001 assessment noted deteriorated transite board, including three square feet of deteriorated transite board on the ground. During the VSI, the building was noted as unoccupied. The exhaust insulation was not present and the deteriorated transite board was not seen on the ground; both appear to have been removed. The remaining transite is deteriorated, but is non-friable and not hazardous per the
3400	assessment report.The only ACM present was floor tiles and mudded fittings. The October2001 assessment noted damaged floor tiles. The damaged floor tile wasstill present during the VSI. No other concerns were noted.
3592	Three homogeneous areas contain ACM: floor tile, transite, and window putty. The October 2001 assessment noted damaged, deteriorated window putty in various locations. The deteriorated ACM was repaired per the 2003 repair report. The VSI noted damaged floor tile. The floor tile is non- friable and not hazardous, and the building is unoccupied. No other concerns were noted during the VSI.

#### Table 3.3.1, Asbestos-Containing Materials (ACM)

## 3.3.2 Drinking Water Quality.

Potable water is available throughout this area via an existing City of Plattsburgh municipal water distribution system (Operated by the Town of Plattsburgh). The non-potable groundwater contains contamination from several IRP sites. Groundwater use restrictions are in effect for the areas of IRP Sites FT-002 (both operable units), SS-005, SS-006, LF-023, and the Mobil Gas Station Plume. IRP sites are discussed in Section 3.2.2 above.

## 3.3.3 Indoor Air Quality.

The potential for vapor intrusion into buildings on this Property may be present due to contamination associated with IRP Sites FT-002 (Source and Groundwater OUs), and the Mobil Gas Station Plume, which are discussed in Sections 3.2.2 (FT-002) and 3.2.1 (Mobil Gas Station Plume) above.

Vapor Intrusion has been evaluated as part of the human health risk assessment for the Fire Training Area (FT-002)/IA Groundwater OU. The human health risk assessment for the Fire Training Area (FT-002)/IA Groundwater OU has found no excess risk associated with the vapor intrusion pathway based on modeling. However, an evaluation of soil vapor intrusion (SVI) into buildings within the IRP Site FT-002 Fire Training Area/IA groundwater contamination plume

has been performed in 2006 and 2007, and a Soil Vapor Intrusion Survey Data Summary Report was completed December 2008. Supplemental evaluations were performed in 2008, 2009, and 2010. A Supplemental Soil Vapor Intrusion Survey Data Summary Report, for the 2008 evaluation was completed in May 2009, and a report detailing the results of the 2009 and 2010 evaluation was completed in December 2010. Results of the sampling and investigation of the following buildings in the FT-002/IA Groundwater OU are provided below.

<u>Building 2753</u> was sampled for sub-slab soil gas vapors in 2006 and Trichloroethylene (TCE) was detected at a concentration of 18,000 micrograms per cubic meter ( $\mu$ g/m<sup>3</sup>) in the northern portion of the building. Indoor air was also sampled, in 2007; chlorinated solvents (PCE and/or TCE) were detected at all locations, but at concentrations less than 1.62  $\mu$ g/m<sup>3</sup> (total chlorinated solvents), but may have been a result of the industrial use of the building for aircraft maintenance activities. A soil vapor extraction (SVE) system has been installed to address sub surface soil gas contamination under the northern portion of the building, and has been in operation since December 2009. Sub-slab soil gas sampling was conducted in November 2010, at the same locations as the 2006 sampling event, to assess the remediation progress since activation of the SVE system. The highest detected concentration was 620  $\mu$ g/m<sup>3</sup> TCE, which was at the same location where 18,000  $\mu$ g/m<sup>3</sup> was detected in 2006. All other TCE, and all PCE, detections were less than their corresponding 2006 sampling results. Operation of the SVE system is still ongoing.

<u>Building 2763</u> was sampled for sub-slab soil gas vapors in 2006 and 2009. In the 2006 sampling event, Tetrachloroethene (PCE) was detected at four (4) out of five (5) locations, at concentrations up to 150  $\mu$ g/m<sup>3</sup>. TCE was detected at three (3) out of five (5) locations, and was detected at concentrations above 100  $\mu$ g/m<sup>3</sup> at two (2) of these locations. Building 2763 was resampled in 2009 (at the same locations as sampled in 2006), in consultation with the NYSDEC and USEPA, to determine if concentrations are decreasing similar to the decreases in the FT-002 groundwater contamination that are occurring in this area. In the 2009 sampling event, PCE was detected at only two (2) locations, and no higher than 5.3  $\mu$ g/m<sup>3</sup>; TCE was still detected at three (3) locations, but no higher than 12  $\mu$ g/m<sup>3</sup>. Indoor air was also sampled, in 2007 and 2009; PCE was detected 0.75 at  $\mu$ g/m<sup>3</sup> at one location in 2007, and there were no detections during the 2009 sampling event. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2766</u> was sampled for sub-slab soil gas vapors in 2006, 2008 and 2009. In the 2006 sampling event, TCE was detected at all three (3) locations, at concentrations up to 4,400  $\mu$ g/m<sup>3</sup>. In the 2008 sampling event (which included the three (3) original locations, and four (4) additional locations) TCE was detected at all locations but at much lower concentrations (the maximum concentration was 510  $\mu$ g/m<sup>3</sup>. In the 2009 sampling event, TCE was again detected at all locations, but at higher concentrations than were detected in 2008 (the highest detected concentration was 1,200  $\mu$ g/m<sup>3</sup>). Indoor air was also sampled, in 2007 and 2008, but there were no detections. Installation of a soil vapor extraction system, to address subsurface soil gas contamination was recommended, and a soil vapor extraction system has been constructed and been in operation since December 2010. Operation of the SVE system is still ongoing.

<u>Building 2786</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Benzene, Ethylbenzene, and o-Xylene were detected in the sub-slab soil gas at 0.89, 0.96, and 1.6  $\mu$ g/m3 respectively at one location, but were not detected at the other location. Toluene was detected at 2.4 and 1.2  $\mu$ g/m3 at the two sample locations. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2786. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

Building 2793 was sampled for sub-slab soil-gas vapors in 2006 and 2009; in addition, a soil and groundwater investigation was conducted in 2008. In the 2006 sampling event, chlorinated solvents (TCE and PCE) were not detected; however, petroleum compounds Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) were detected at all three (3) locations at concentrations of 2,437 - 14,445  $\mu$ g/m<sup>3</sup> (total BTEX). Indoor air sampling was conducted in 2007, and BTEX compounds were detected at all five (5) locations at concentrations up to 12.1  $\mu$ g/m<sup>3</sup>; however, the same compounds were also found in the various chemicals and fuels being used in the building (as part of the building's use for aircraft storage and maintenance) and therefore their presence was not likely attributable to soil vapor intrusion. A soil and groundwater investigation was conducted, in 2008, to determine if there is a source of contamination present that is causing the high levels of BTEX in the sub-slab soil gas. The 2008 soil and groundwater investigation found no source of contamination but recommended resampling the sub-slab soil gas to verify the results of the 2006 sampling event. The 2009 sampling event found significant reductions in BTEX concentrations at two (2) locations. The total BTEX concentrations detected at the third location was in excess of 48,000  $\mu$ g/m<sup>3</sup>, even though soil and groundwater sampling, via geoprobe, of this very location six months earlier did not detect BTEX. Additional sampling has been performed (March 2010); a sub-slab soil gas sample was collected at the location of the potentially anomalous result from March 2009, and several other locations throughout the building. The total concentration of BTEX in each sample was less than  $100 \,\mu\text{g/m}^3$ , which confirms that the March 2009 result was likely anomalous. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2796</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Toluene was detected at 1.5 and 3.8  $\mu$ g/m<sup>3</sup> at the two sample locations. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2796. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

<u>Building 2797</u> was sampled, in two locations, for sub-slab soil gas vapors in 2006. No chlorinated compounds were detected at either sampling location. Toluene and m,p-Xylene were detected in the sub-slab soil gas at 1.4 and 2.5  $\mu$ g/m<sup>3</sup> respectively at one location, but were not detected at the other location. Based on the minor concentrations detected in the sub-slab soil gas, indoor air sampling was not performed at Building 2797. Based on the sampling results there appears to be limited potential for soil vapor intrusion.

The seven buildings discussed above are among other facilities located within the boundaries as shown at Attachments 1O-2 and 1O-3 that will be subjected to the agreed upon non-residential use and SVI restrictions as stated in the February 2012 AFRPA letter. The Institutional Controls, and a Non-Residential Use restriction, to address the potential soil vapor intrusion pathway have been identified as part of the planned remedy for the Fire Training Area (FT-002)/IA Groundwater OU and are further detailed at Attachments 1F-1 (as shown within the green line) and 1F-2 (as shown within the blue line). In addition, the LUC/ICs for IRP Site FT-002 Source OU, and the Mobil Gas Station Plume include an institutional control addressing the potential risk from vapor intrusion as detailed at Attachments 1E and 1L.

#### 3.3.4 Lead-Based Paint (LBP), Other Facilities.

An LBP survey has not been performed for this property. Facilities listed in Table 3.3.4 were constructed prior to the Department of Defense 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 deteriorated painted surfaces for each of these facilities as follows:

Table 5.5.4, Dead-Dased Faint, One Fachilies			
Location	Comments		
2750, 2778, 2784, 2787,	Deteriorated paint was noted in the interior and on the exteriors of		
2796, 2797, 2802, 2818,	these facilities during the VSI.		
2833, 2837, 2840, 2841,			
2890, 3400, 3592			
2702, 2704, 2714, 2720,	Deteriorated paint was noted only on the exteriors of these		
2748, 2749, 2754, 2774,	facilities during the VSI.		
2786, 2827, 2830			
2710, 2712, 2716, 2736,	No deteriorated/peeling paint was noted during the VSI.		
2738, 2741, 2753, 2763,			
2766, 2779, 2785, 2793,			
2801, 2808, 2815, 2820			

Table 3.3.4, Lead-Based Paint, Other Facilitie	S
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The following facilities were constructed after 1978 and are not likely to contain or be coated with lead-based paint or do not contain painted surfaces: 2700, 2706, 2709, 2713, 2731, 2739, 2752, 2768, 2776, 2777, 2780, 2789, 2790, 2794, 2795, 2815, 2816, 2826, 2836, 2842, 3005, 3010, 3015, 3020, 3025, 3030, 3050, 3060, 3065, 3070, 3075, 3080, 3100, 3110, 3120, 3130, 3140, 3150, 3160, 3218, 3227, 3229, 3235, 3236, 3283, 3294, and 3412.

## 3.3.5 Polychlorinated Biphenyls (PCBs).

An inventory/sampling of all base electrical distribution system equipment for PCBs was conducted in 1994; all equipment containing PCBs above 50 ppm has been removed. Per the Basewide EBS (Table H-2) electrical transformers containing over 500 ppm, PCBs were used at/near Buildings 2753 and 2763; transformers containing between 50 and 500 ppm PCBs were used/stored at/near Buildings 2720, 2766, 2775, 2778, 2779, 2801, 2802, 3250, and 3400. Per

the supplemental evaluation report, no contamination was found at the former PCB transformer locations near Buildings 2720 and 2766. Minor soil contamination was detected at transformer sites near/associated with Facilities 2763, 2775, 2778, 2801, 2802 and 3400, but no additional actions were necessary based on comparison to soil guidelines in NYSDEC Soil TAGM HRW-94-4046. Based on results/recommendations in the May 2001 supplemental evaluation report, approximately 20.7 tons of soil adjacent to transformers near Buildings 2753, and 3250 (TF-2753, and 3250, shown at Attachments 1C and 1D) was removed in September - October 2002; confirmatory sampling and a closure report, recommending no further action, has been completed (as part of the February 2005 Closure Report for Investigation and/or Remediation of Miscellaneous EBS Factors).

#### 3.4 Other Factors/Resources.

Other factors or resources which could impact or be impacted, but are not present or have no environmental impacts are flood plains, prime/unique farmlands, and outdoor air quality. Other factors present on the property are discussed below.

#### 3.4.1 Air Conformity/Air Permits.

Table F-1 of the November 1995 EIS indicates that there were Air Emissions Permits for aircraft spray painting in Buildings 2741, 2763, and 2890; operation of paint booths in Buildings 2753 and 2890; and operation of a plastic media blasting booth in Building 2753. All of these permits have been closed out.

## 3.4.2 Energy (Utilities).

There are aboveground and underground electrical and underground natural gas transmission lines throughout the property, and are operated by New York State Electric and Gas (NYSEG). All electrical equipment has been tested for PCBs, and equipment containing PCBs (above 50 ppm) has been removed (see Section 3.3.5). No concerns were noted during the VSI.

#### 3.4.3 Historic Property (including Archeological Resources).

Recordation of facility information for Cold War Era Resources has been completed for Plattsburgh AFB and submitted to the National Park Service. There are no restrictions associated with Cold War Era other Historic facilities in this property.

#### 3.4.4 Sanitary Sewer Systems.

The area east of the aircraft parking ramp is serviced by a sanitary sewer system (which discharges into the City of Plattsburgh treatment facility). Sanitary sewer service is not available on the aircraft parking ramp, or the property west of the aircraft parking ramp (see discussion of septic tanks in Section 3.4.7 below).

## 3.4.5 Sensitive Habitat and Wetlands.

Wetlands are present on this property to the east and southeast of Building 2700.

## 3.4.6 Septic Tanks (Waste Water).

The airfield, and area west of the runway are not serviced by a sanitary sewer system; waste water disposal in these areas was previously via septic tanks and leach fields. All septic tanks and associated leach fields have been removed and are documented in the April 1997 Closure Report for Removal of Underground Storage Tanks and Aboveground Storage Tanks (6 volumes). A summary and status of all septic tanks associated with property is provided in Table 3.4.7 below; additional information can be found in Table F-2 of the Basewide EBS.

Location	Comments
3226	SPT-3226: A 550-gallon septic tank and leach field supported Building
	3225, a ground control approach facility. The system was removed in 1996.
	No contamination was noted in the April 1997 closure report or during the
	VSI.
3401	SPT-3401: A 1,000-gallon septic tank and drain field supported Building
	3400. This area is part of IRP Site SS-027, which has been closed out (see
	Section 3.2.2). The system was removed in 1996. No contamination was
	noted in the April 1997 closure report or during the VSI.

## 3.4.7 Solid Waste.

A domestic waste landfill was operated from 1966 to 1981 in the northwest portion of this property, is IRP Site LF-023, and discussed in Section 3.2.2.

# 3.4.8 Threatened and Endangered Species.

Per Section 3.4.5.3 of the Basewide EIS, there are no federal-listed threatened, endangered, or candidate plant or wildlife species on Plattsburgh AFB. There are four state-listed bird species that have been observed on or near this area: the northern harrier and the osprey, listed as "threatened"; the great blue heron, listed as "protected"; and the grasshopper sparrow, listed as a "species of special concern". The EIS further notes that a colony of grasshopper sparrows is present in the flightline grassland.

# 3.4.9 Transportation.

Several roads exist on this property. In addition, this property was used previously as a military airport and has been converted into a municipal airport. There are no concerns with the roads on this property. Most environmental issues associated with the airport area are identified and

discussed in Sections 3.2.1, 3.2.2 and 3.2.5, and are being addressed as part of IRP Sites SS-004 and FT-002.

# **CHAPTER 4: PROPERTY TRANSFER CATEGORY**

## 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 Category (ECC) 1, 2, 4, 5 or 6, as indicated in Tables 4 and 4A below. Category 1 areas are those where no release or disposal of hazardous substances or petroleum products has occurred; Category 2 areas are those where only release or disposal of petroleum products has occurred; Category 4 areas are those areas 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; Category 5 areas are those where release, disposal, and/or migration of hazardous substance have occurred and removal/remedial actions are underway, but not all required actions are complete; Category 6 areas are those where release, disposal, and/or migration of hazardous substances have occurred, but required response actions have not yet been implemented.

Changes in the condition of these facilities, since publication of the Basewide EBS, are presented in Table 4.

Table 4, Property Transfer Category			
	Old	New	
Location	ECC*	ECC	Reason for change in Environmental Condition
			Category
2830, 2833, 2837, 2840, 2841,	7	1	These locations were originally part of IRP Site FT-002
2842			Fire Training Area/IA Groundwater OU, but later
			determined to not be impacted (per the 2001 Remedial
			Investigation/Feasibility Study (RI/FS) Report). There
			are no reported spills at these locations and are not
			within boundaries of IRP sites or areas of institutional
			controls.
2890, 3025	7	4	Within the area of IRP Site SS-016. Remedial activities
			have been completed at Site SS-016 (in 2008).
3412	7	4	This location was originally part of IRP Site FT-002
			Fire Training Area/IA Groundwater OU, but later
			determined to not be impacted (per the 2001 RI/FS
			Report). This location is within the area of IRP Site LF-
			023 Groundwater Operable Unit; remedial investigation
			and record of decision have been completed.
2700, 2702, 2704, 2706, 2709,	7	5	Within the area of IRP Site FT-002 Fire Training
2710, 2712, 2713, 2714, 2716,			Area/IA Groundwater OU contamination or associated
2720, 2731, 2736, 2738, 2739,			institutional controls. The RI/FS report was completed

# **Table 4, Property Transfer Category**

	Old	New	
Location	ECC*	ECC	Reason for change in Environmental Condition
			Category
2741, 2748, 2749, 2750, 2752,			in 2001. All of the physical components of the remedial
2753, 2754, 2763, 2766, 2774,			action have been constructed (2004-2010) and are in
2776, 2777, 2778, 2779, 2780,			operation. The Record of Decision (ROD) is in
2784, 2785, 2786, 2787, 2789,			progress.
2790, 2793, 2794, 2795, 2796,			
2797, 2801, 2802, 2808, 2815,			
2816, 2818, 2820, 2826, 2827,			
2836, 3005, 3010, 3015, 3020,			
3100, 3110, 3145, 3218, 3227,			
3229, 3235, 3236, 3283, 3294,			
, 3400, 3592			
2768, 3060, 3065, 3070, 3075,	7	6	Within the area of IRP Site SS-004 Soil OU. Remedial
3080, 3120, 3130, 3140, 3150,			activities are pending at IRP Site SS-004 Soil OU; a
3160			Remedial Investigation was completed in 2007, and a
			Proposed Plan/ROD is in progress.

\*As described in the basewide EBS dated 1997

## Table 4A, Property Transfer Category - Former Facilities

	Old	New	
Location	ECC*	ECC	<b>Reason for change in Environmental Condition</b>
			Category
2824, 2825	4	2	Two petroleum spills attributed to Facility 2824
			vicinity; both spills have been cleaned up/closed.
			Category change is a result of change in DoD guidance
			with respect to petroleum release sites
2886, 2901, 2902	7	4	Within the area of IRP Site SS-016. Remedial activities
			have been completed at Site SS-016 (in 2008).
2708, 2711, 2715, 2751,	7	5	Within the area of IRP Site FT-002 Fire Training
2755, 2759, 2760, 2764,			Area/IA Groundwater OU contamination or associated
2765, 2770, 2775, 2803,			institutional controls. The RI/FS report was completed
2810, 2811, 2812, 3216,			in 2001. All of the physical components of the remedial
3226, 3237, 3284, 3288,			action have been constructed (2004-2010) and are in
3289, 3290, 3399, 3401,			operation. The Record of Decision (ROD) is in
			progress.
2820, 3063, 3066, 3067,	7	6	Within the area of IRP Site SS-004 Soil OU. Remedial
3071, 3072, 3073, 3074,			activities are pending at IRP Site SS-004 Soil OU; a
3076, 3068, 3069, 3205,			Remedial Investigation was completed in 2007, and a
3220, 3221, 3222, 3230,			Proposed Plan/ROD is in progress.
3231, 3232, 3240, 3241,			
3250, 3251, 3260, 3261,			

Location	Old ECC*	New ECC	Reason for change in Environmental Condition Category
3262, 3270, 3271, 3280,			
3281, 3282, 3285, 3286, 3287			

\*As described in the basewide EBS dated 1997

Areas where required remedial actions are not complete (have a new ECC of "5" or "6" in Tables 4 or 4A) require a deferral of the CERCLA 120(h)(3) covenant, and evaluation via a Finding of Suitability For Early Transfer (FOSET); the area requiring a FOSET is shown at Attachment 1M and 10. All other areas (have a new ECC of "1", "2", or "4" in Tables 4 or 4A) will be evaluated via a Finding of Suitability for Transfer (FOST); these areas are also shown in Attachment 1M.

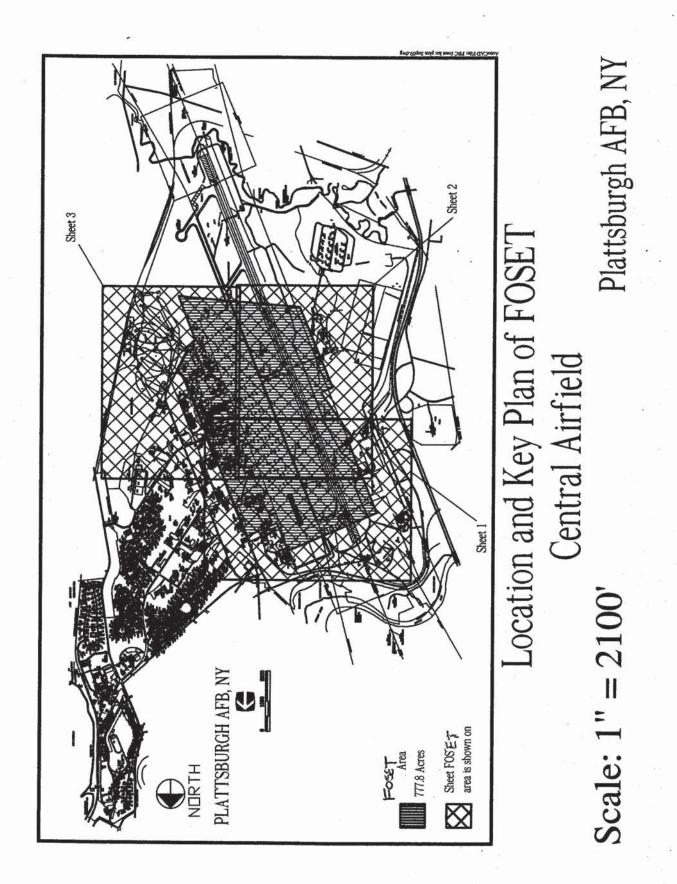
#### **CHAPTER 5: CERTIFICATION**

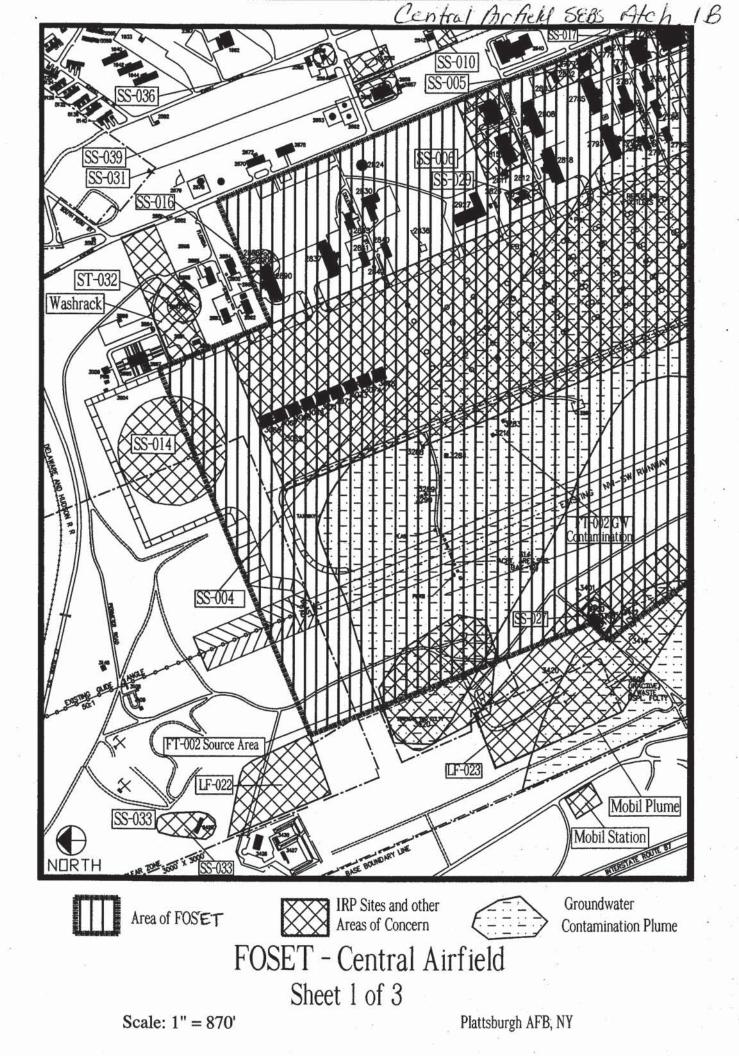
I certify that the property conditions stated in this report are based on a thorough review of available records, visual inspections, and sampling and analysis as noted, and are true and correct to the best of my knowledge and belief.

DAVID S. FARNSWORTH BRAC Environmental Coordinator AFCEE/EXC Plattsburgh

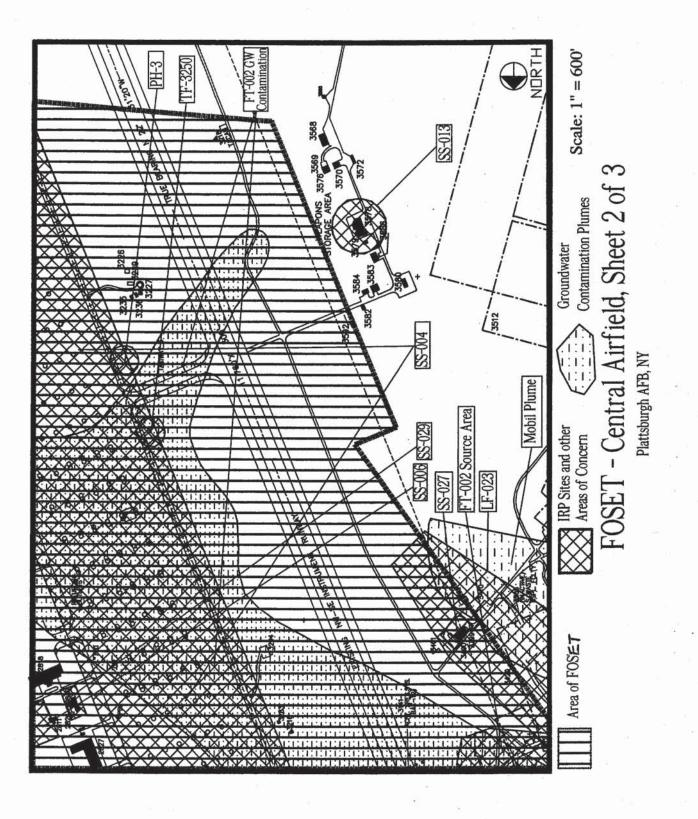
Date

Attachments: 1A. Location Plans 1B-D. Site Plan 1E. IRP Site FT-002 Source OU LUC/ICs 1F-1/2. IRP Site FT-002 Groundwater OU LUC/ICs 1G. IRP Site FT-002 Groundwater OU Plumes 1H. IRP Site SS-005 LUC/ICs 1I. IRP Site SS-006 LUC/ICs 1J. IRP Site LF-022 LUC/ICs 1K. IRP Site LF-023 LUC/ICs 1L. Mobil Gas Station Plume LUC/ICs 1M. Former Fuel Distribution System 1N. Location of areas requiring FOST/FOSET 1O-1/2/3 FOSET Parcel and Restrictions Central Airfield SEBS Atch 1A

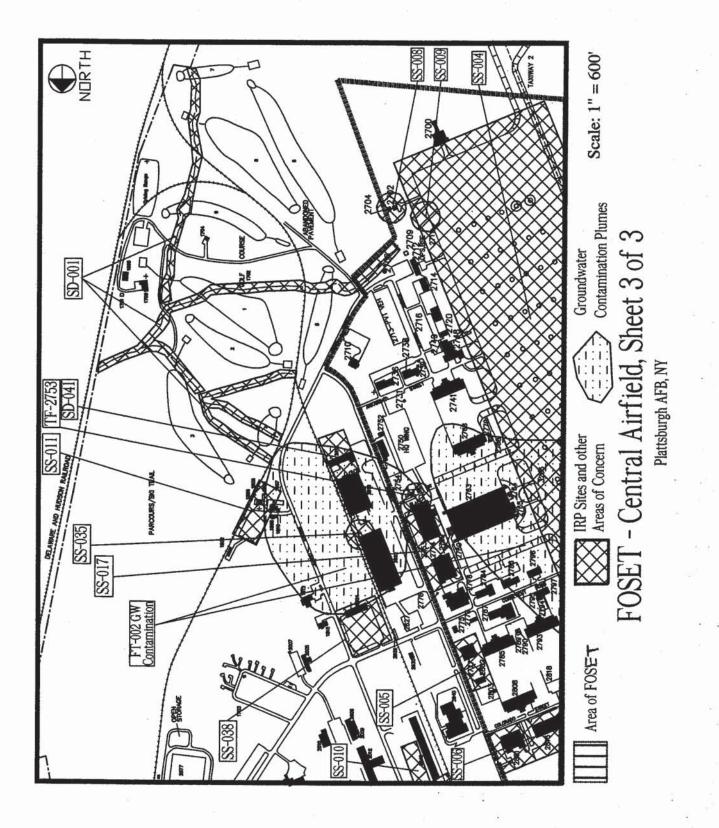


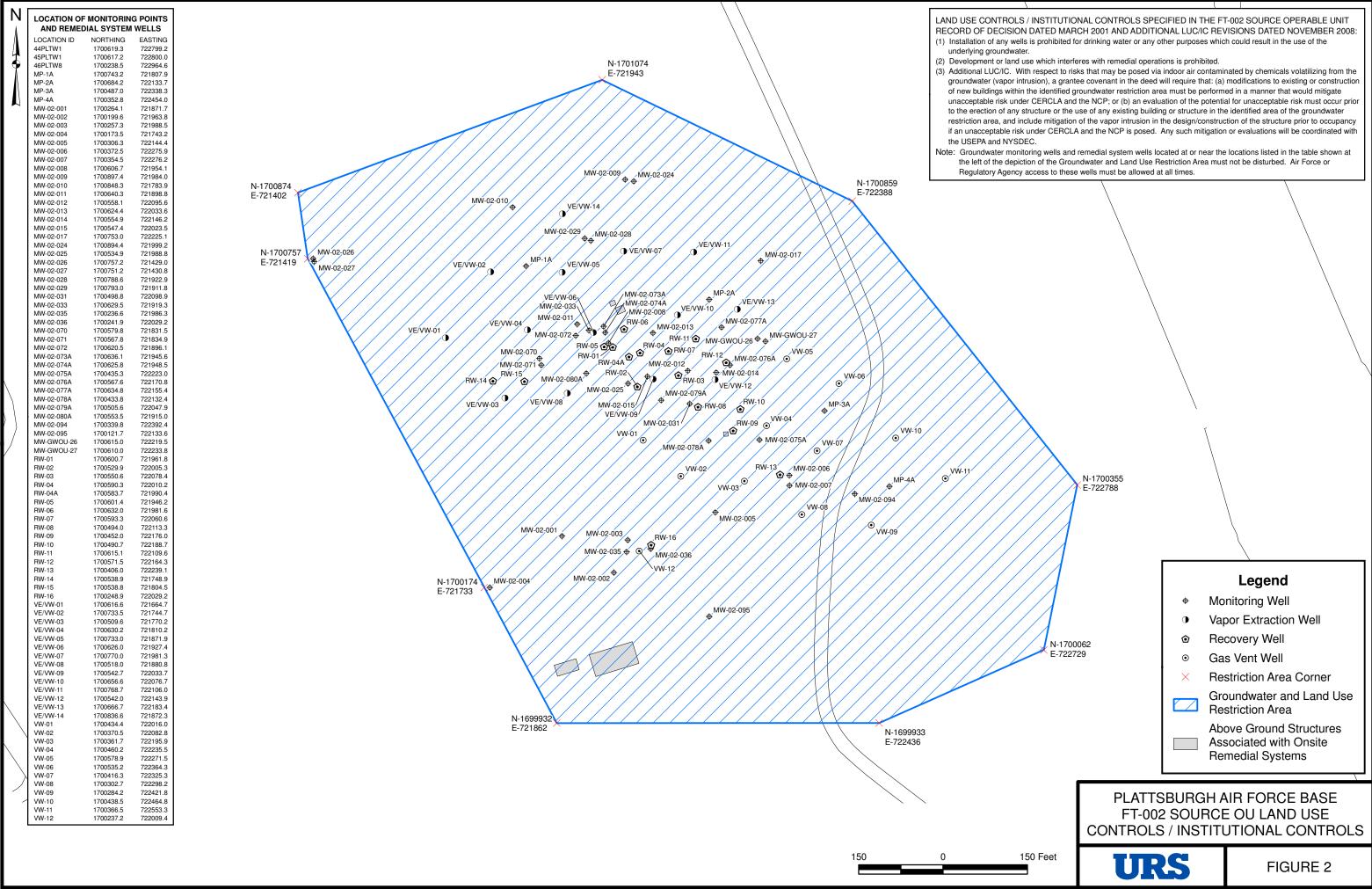


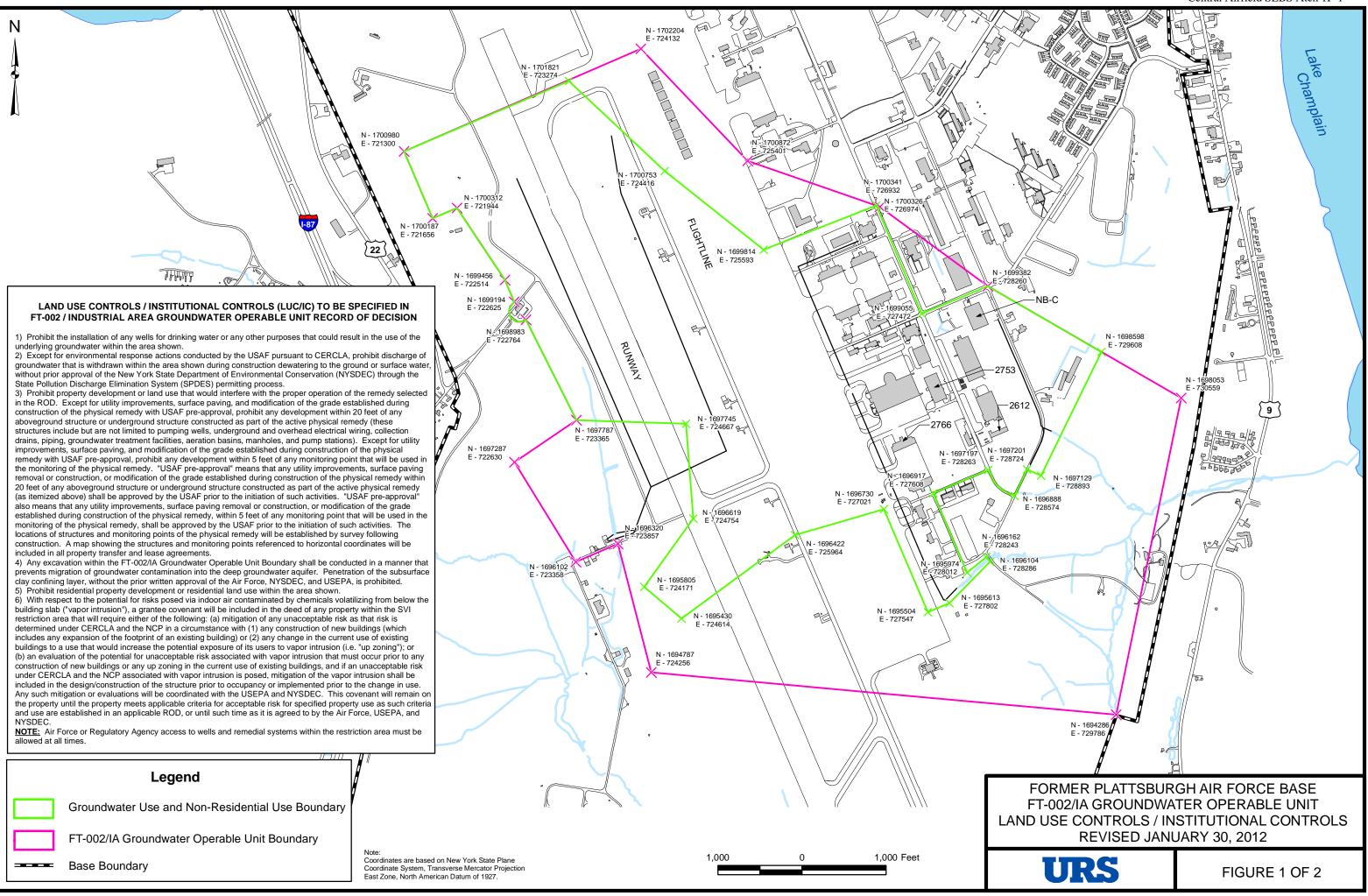
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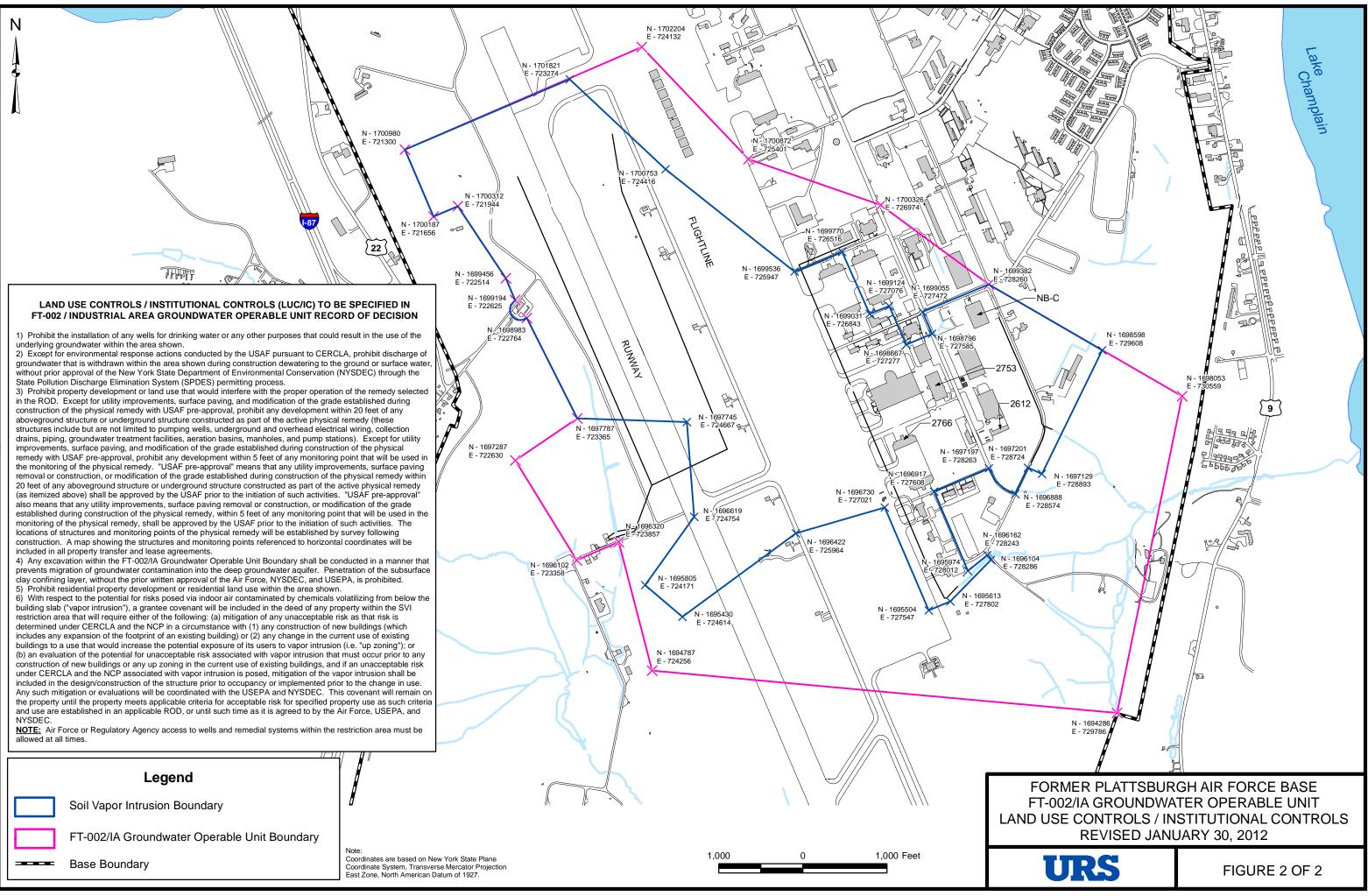
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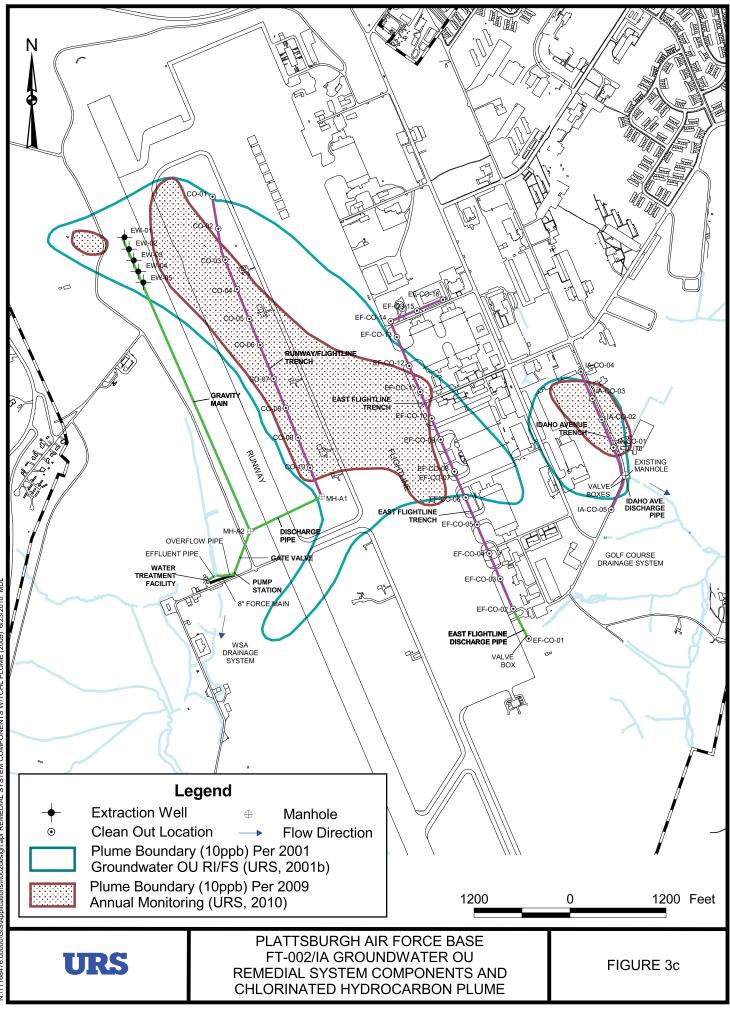




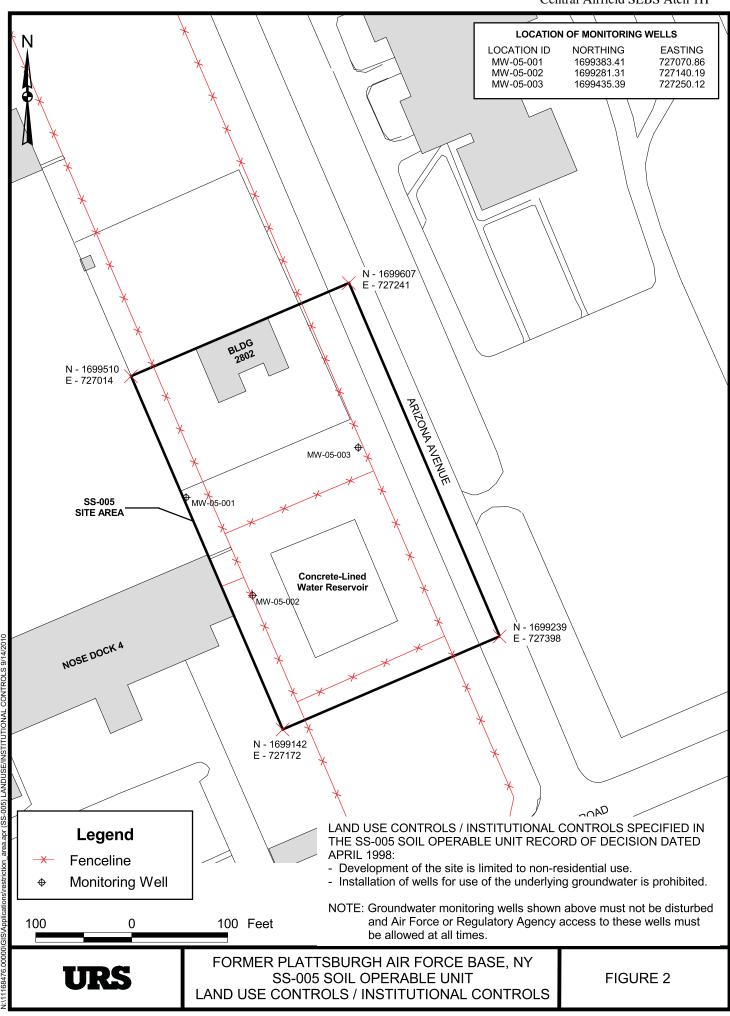
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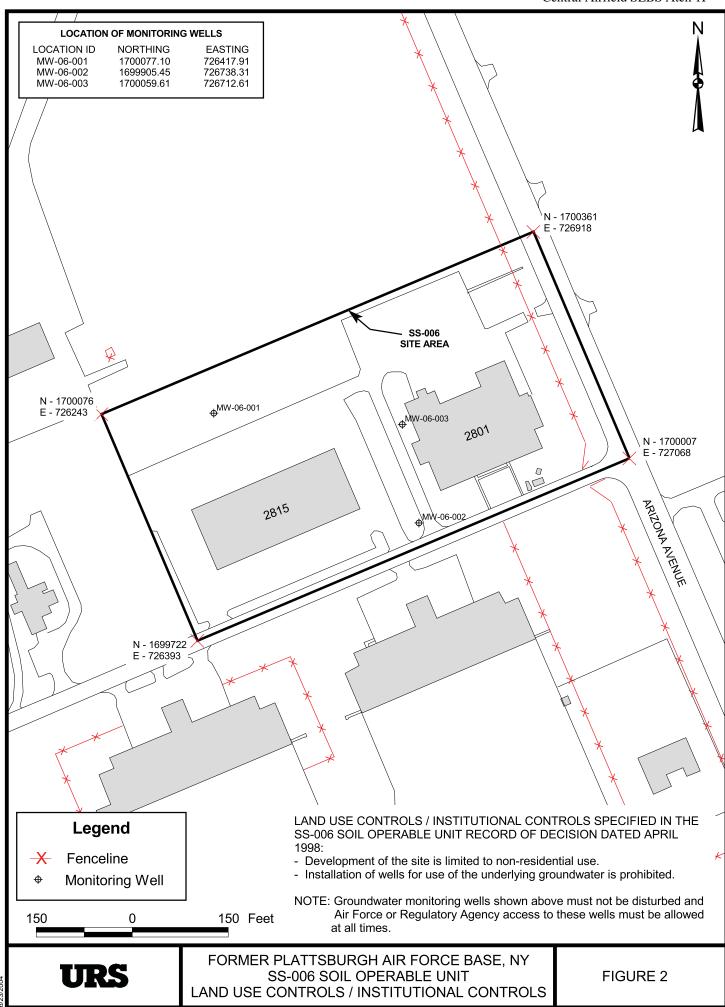


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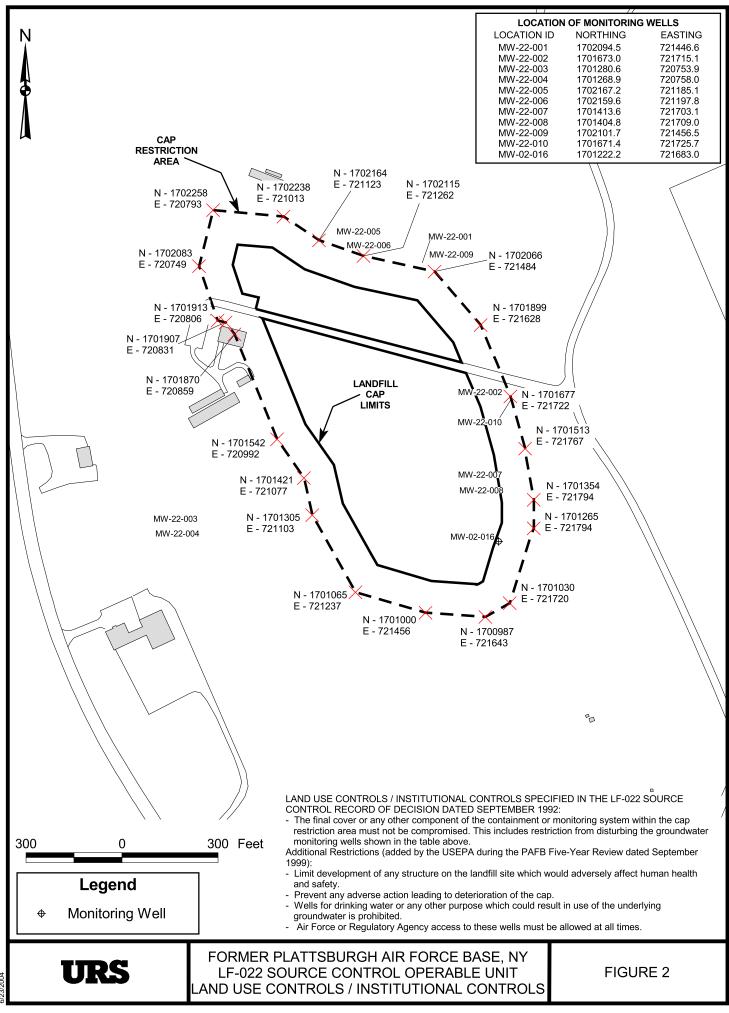
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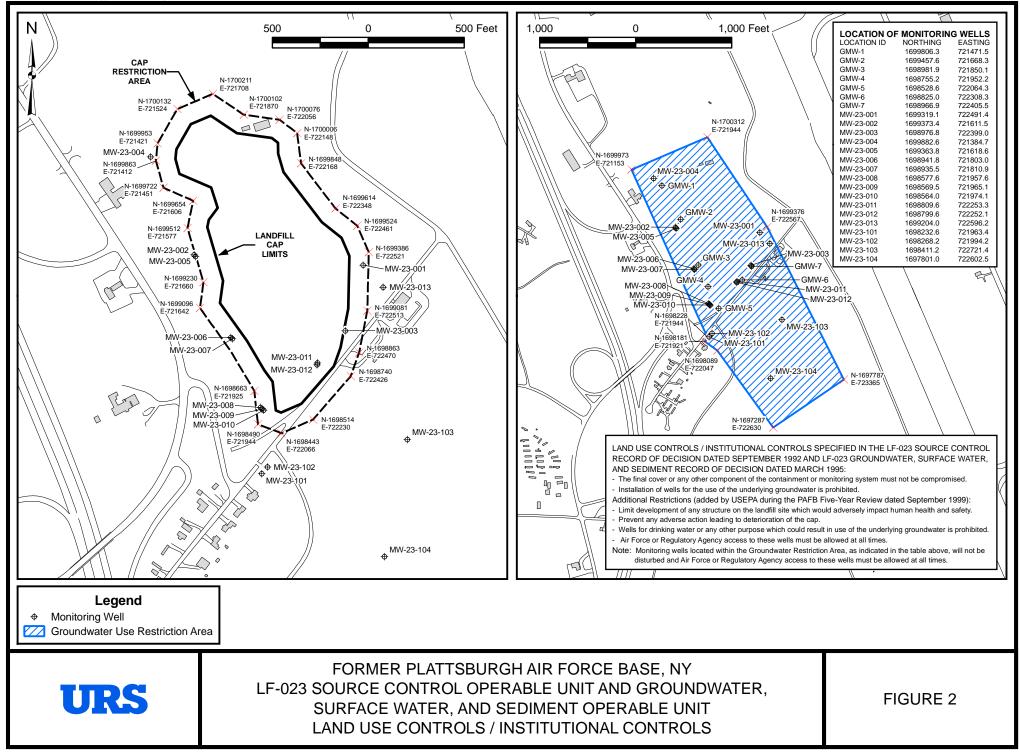
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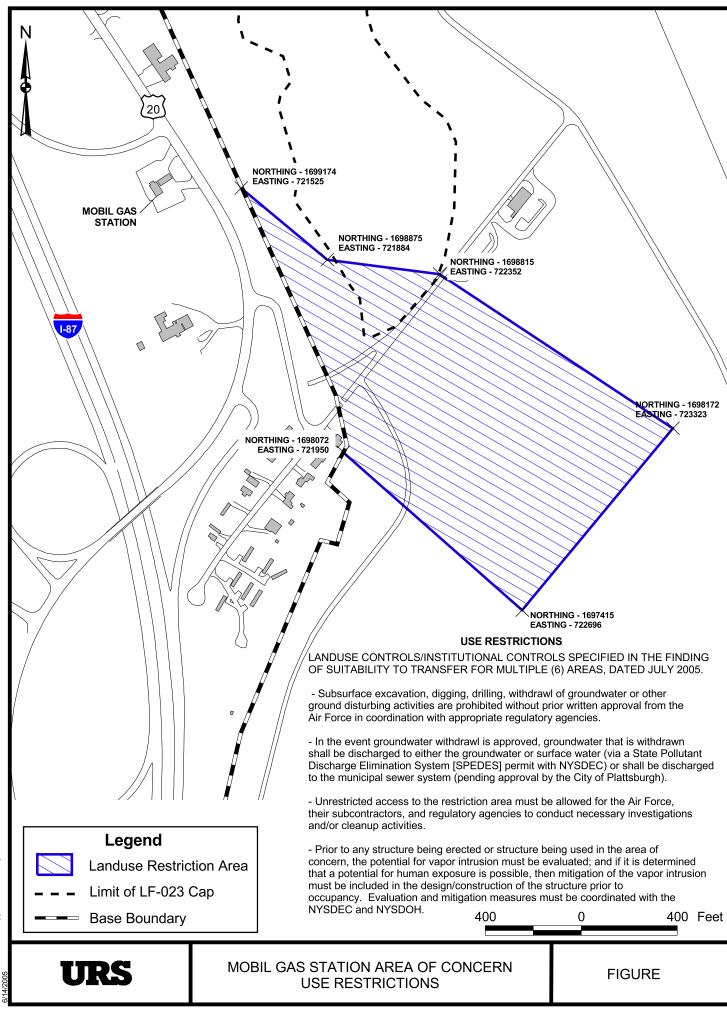
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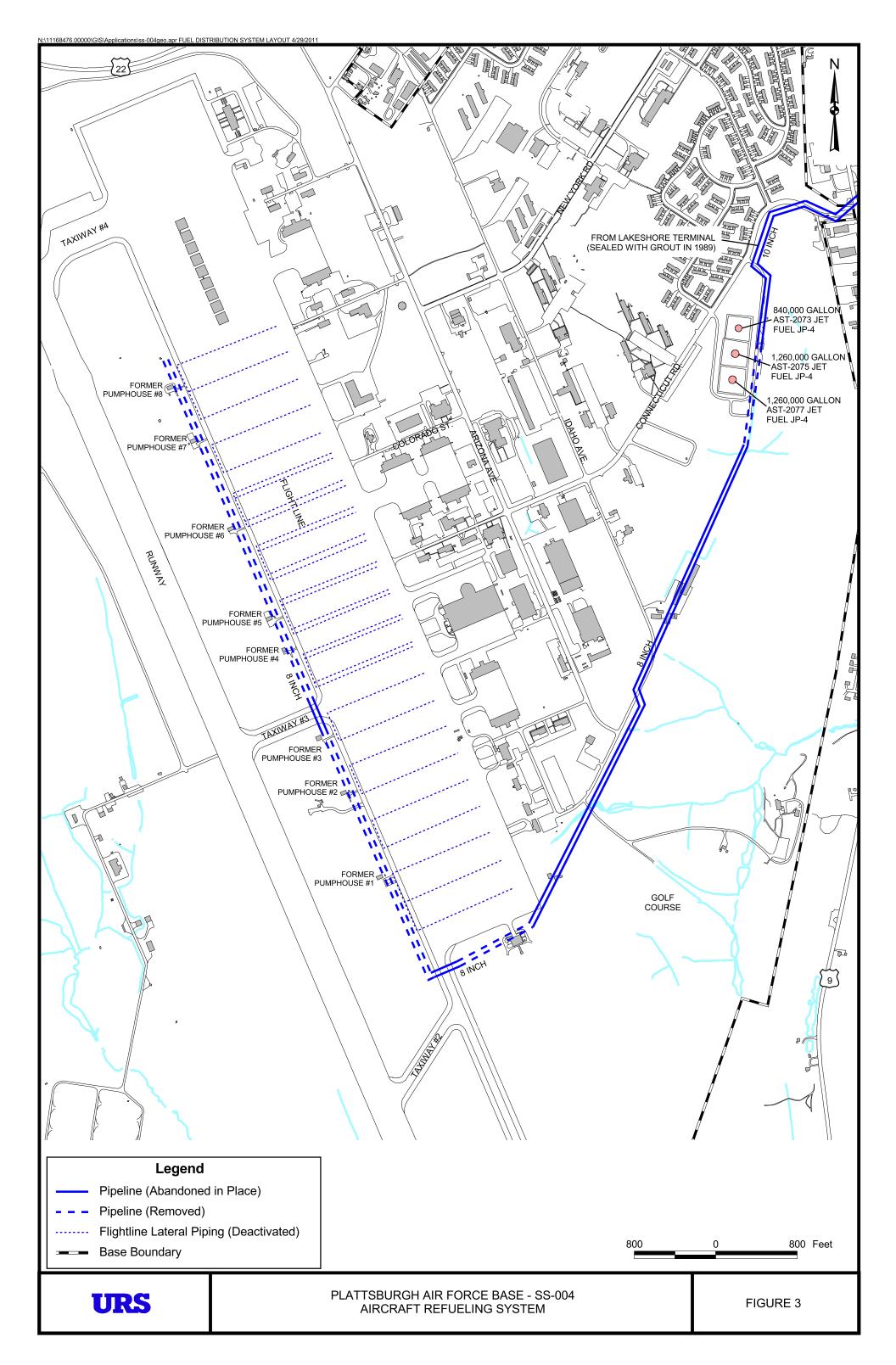


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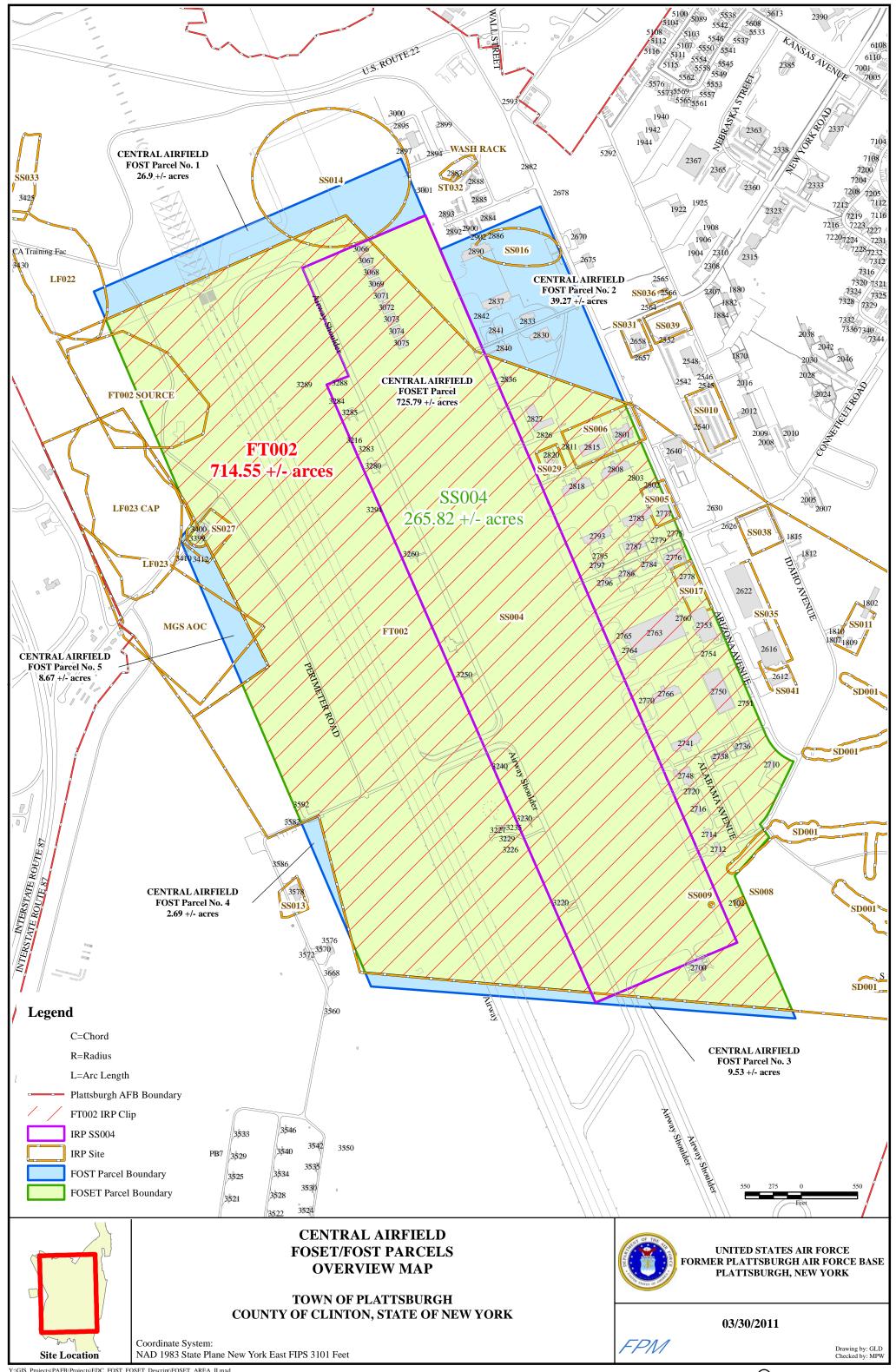
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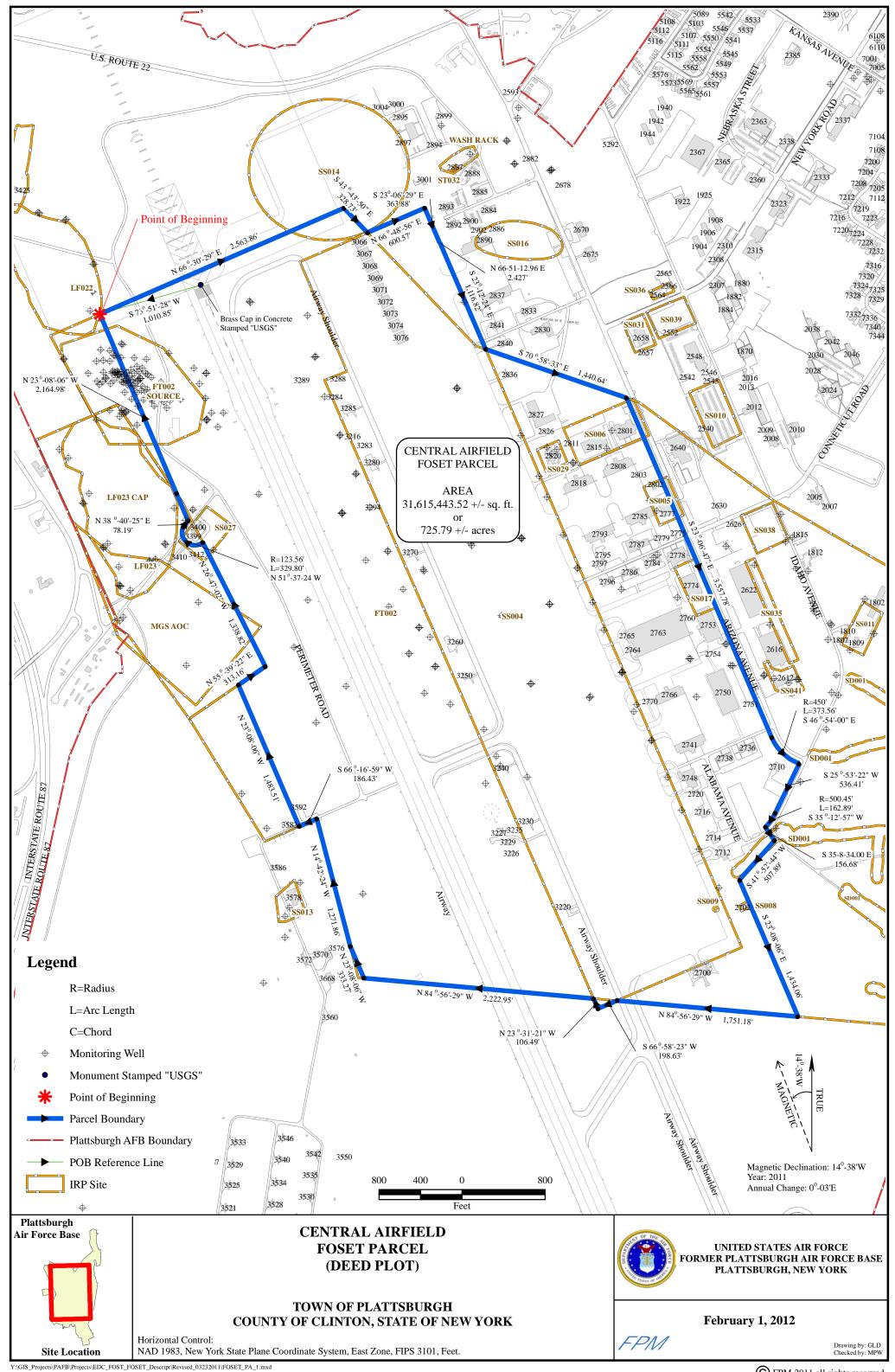


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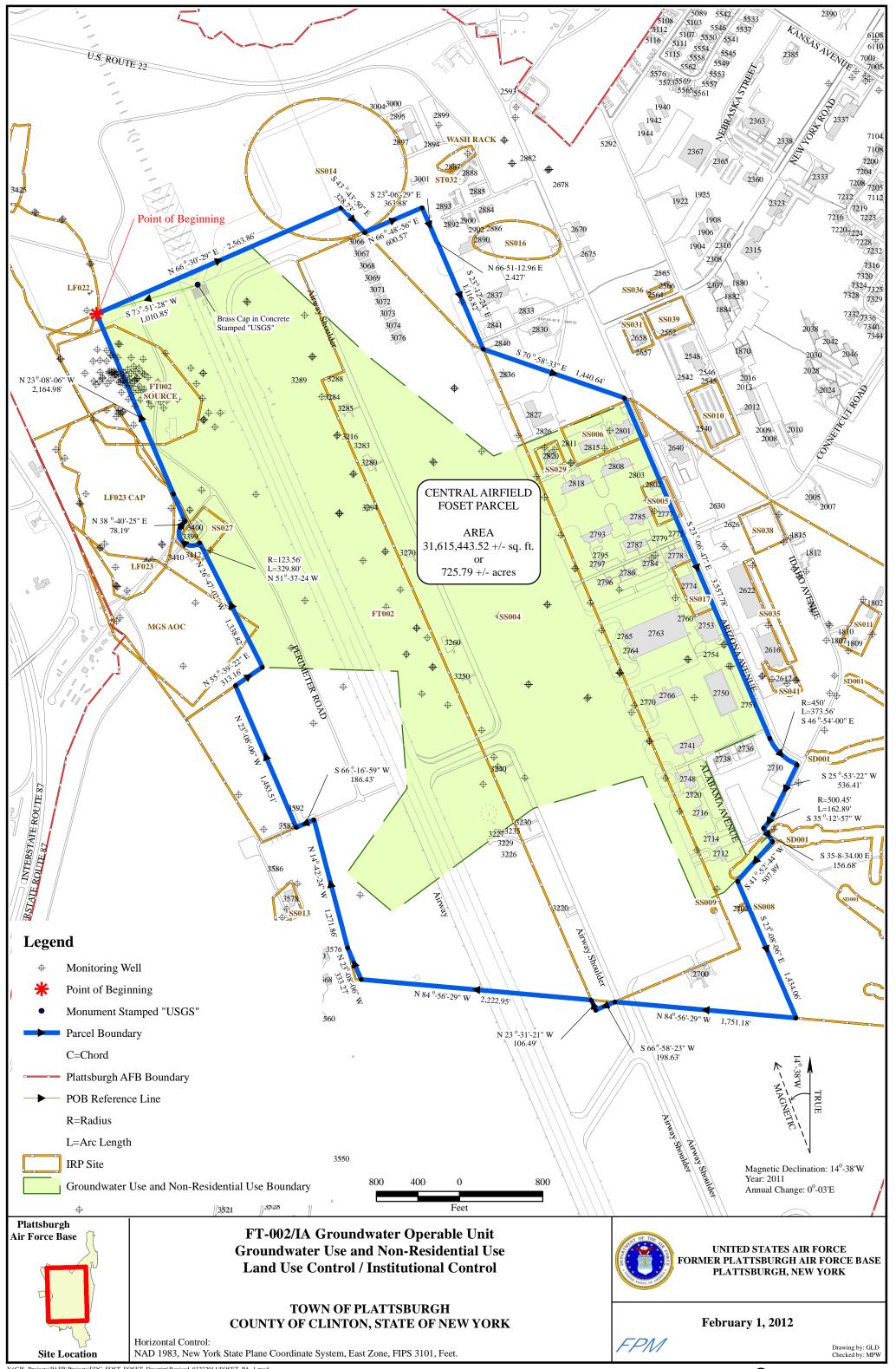


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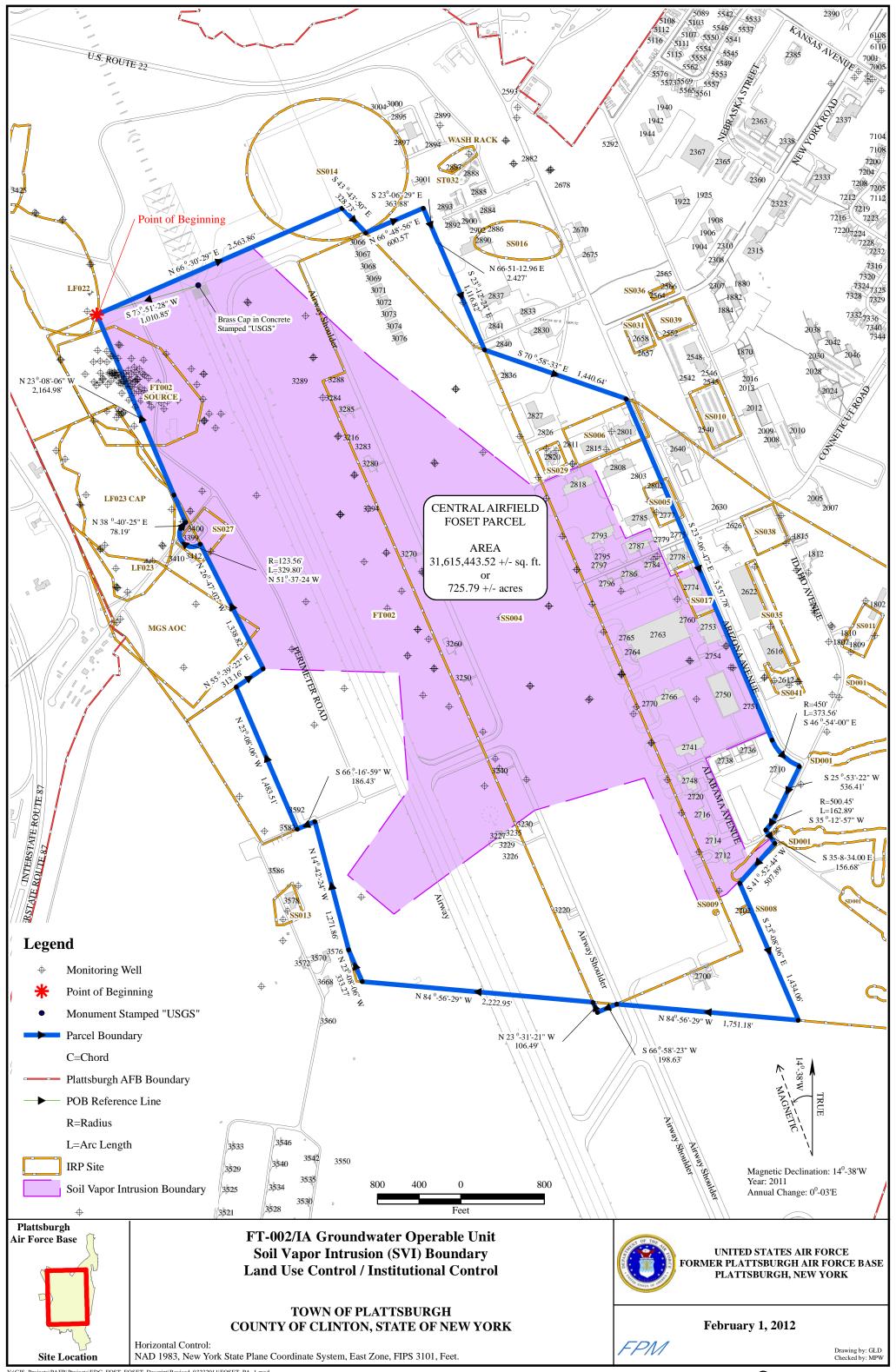


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