May 11, 2016

Mr. Adam Little
Project Manager
CENWO-PM-HB
1616 Capital Avenue
Omaha, NE 68102-4901

Re: Draft Final Proposed Plan
174th Attack Wing
New York Air National Guard
Hancock Field Air National Guard Base
Syracuse, New York

Dear Mr. Little:

Amec Foster Wheeler Environment & Infrastructure, Inc. is pleased to submit an electronic copy of the above referenced document for the Hancock Field Air National Guard Base for your records. This electronic submittal and associated hard copies will be forwarded to Mr. Robert Corcoran of the New York State Department of Environmental Conservation (NYSDEC); Ms. Jody Murata of the Air National Guard (ANG); and Lt. Brent Lynch at the Hancock Field ANG Base. Should you have any questions regarding this submittal, please do not hesitate to call me at 865-671-6774.

Sincerely,

Amec Foster Wheeler Environment & Infrastructure, Inc.

Jeremy S. Bennett, CHMM
Project Manager

Cc: Robert Corcoran – NYSDEC
Jody Murata – ANG Program Manager
2nd Lt Brent Lynch – Hancock Air National Guard Base Environmental Manager
AMEC Central Files (electronic copy)

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Proposed Plan for Hancock Air National Guard Base Munitions Response Site SR001

Air National Guard Proposes No Further Action

This **Proposed Plan** presents the Air National Guard's (ANG) **No Further Action** (NFA) recommendation at the Small Arms Range and Shooting-In Buttress, **Munitions Response Site** (MRS) SR001 located at the Hancock Field Air National Guard Base (Hancock Field) (Figure 1). NFA is proposed at this site where a **Non-Time Critical Removal Action** (NTCRA) was conducted to remove munitions-impacted soils and remove practice grenade debris. Prior to the NTCRA, soils were identified above the **New York State Department of Environmental Conservation** (NYSDEC) Soil Cleanup Objectives for **munitions constituents** (MCs). The NTCRA was conducted in coordination with the ANG and NYSDEC such that remaining MC concentrations in soils are below the regulatory and ecological risk criteria, demonstrating that potential human health and ecological risks no longer exist at the sites.

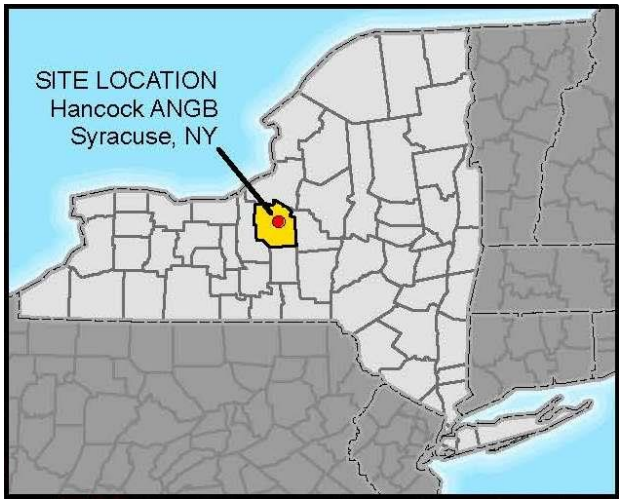

Figure 1. Installation Location

The ANG, in consultation with the NYSDEC, will make a final decision regarding NFA status for the MRSs after reviewing and considering all information submitted during the 30-day public comment period beginning April 25, 2016 and ending May 25, 2016. Therefore, the public is encouraged to review and comment on the Proposed Plan. A Responsiveness Summary, which summarizes the ANG's response to comments received during the comment period, will be issued as part of the **Record of Decision** (ROD) and will become

Public Comment Period:
June 6, 2016 – July 6, 2016
The Air National Guard will accept written comments on the Proposed Plan during the public comment period. Comment letters must be postmarked by July 6, 2016 and should be submitted to:

Jody Murata
NGB/A7OR
3501 Fetchet Avenue
Joint Base Andrews, MD 20762-5157

To request an extension of the public comment period, send a request in writing to Jody Murata at the above address by July 6, 2016.

Public Meeting:
Date: July 12, 2016 at 6:30 p.m.
Location: Double Tree Hotel
6301 State Route 298
East Syracuse, NY 13057

The Air National Guard will host a public meeting to explain the Proposed Plan. Oral and written comments will also be accepted at the meeting.
For more information, the Information Repository is available at the following location:

Onondaga County Public Library,
Robert P. Kinchen Central Library
447 South Salina Street
Syracuse, NY 13202
(315) 435-1900

Hours: Mon, Thurs, Fri 8:30-4:55;
Tues & Wed 8:30-7:25; Sat 9-4:55;
Sun closed
Website: http://www.onlib.org

part of the **Administrative Record** (AR).

This Proposed Plan provides the public with the information necessary to participate with the ANG and NYSDEC in determining the acceptability of NFA for MRS SR001. This Proposed Plan also summarizes the site history, results of the **Comprehensive Site Evaluation** (CSE) process, and the actions conducted during the NTCRA, which can be found in more detail within the project documents and records that are available at the **Information Repository** (IR) located at the Onondaga County Public Library and the Hancock Field AR located at the Base. Following public review and comment, the ANG and NYSDEC will finalize the decision in a ROD. A glossary of terms in bold type is provided at the end of this document.

Regulatory Framework

The ANG has prepared this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the **Comprehensive Environmental Response Compensation, and Liability Act** (CERCLA) and Section 300.430(f)(2) of the **National Oil and Hazardous Substances Pollution Contingency Plan** (NCP). In accordance with the CERCLA, NCP, and **Military Munitions Response Program** (MMRP), this Proposed Plan presents the ANG's NFA recommendations based on the results of the completed NTCRA, which accelerated the cleanup and elimination of potential human health hazards at MRS SR001.

During the CSE and NTCRA process and in compliance with the MMRP, the **Munitions Response Prioritization Protocol** (MRSPP) was updated. The MRSPP is a means for the ANG to assess the relative risk of each MRS throughout the course of a project and provides a mechanism for public involvement in establishing a prioritization of remedial action at a Site. Figure 2 summarizes the regulatory process conducted for MRS SR001.

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Site Background

Hancock Field is located at the Syracuse Hancock International Airport, approximately 5 miles north of the City of Syracuse in Onondaga County, New York. The land encompassing the installation is owned by the United States Air Force (fee-owned) with a license to New York State for ANG use. Hancock Field is home to the 174th Attack Wing as well as the 274th Air Support Operations Squadron.

NTCRA activities were conducted within two areas located within one **Munitions Response Area** (MRA), the Small Arms Range and Shooting-In Buttress (MRA SR001). Based upon the results of the 2011 CSE Phase II, MRA SR001 was further subdivided into MRSs as detailed below.

<u>MRA SR001 (3.7 acres)</u>

- MRS SR001 (1.9 acres)
  - Small Arms Range and Shooting-In Buttress (0.63 acres)

- 40-millimeter (mm) Practice Grenade Area (1.27 acres)

– MRS SR001a (1.8 acres)

MRS SR001 is located on a tract of land east of Hancock International Airport and encompasses approximately 1.9 acres of land located within MRA SR001 (Figure 3). The small arms range was constructed in the 1960s and used to fire small arms up to .50-caliber munitions. The practice grenade range was reportedly used for M203 grenade launcher training using M781 40-mm practice grenades. Future use of the MRS SR001 area in not known at this time.

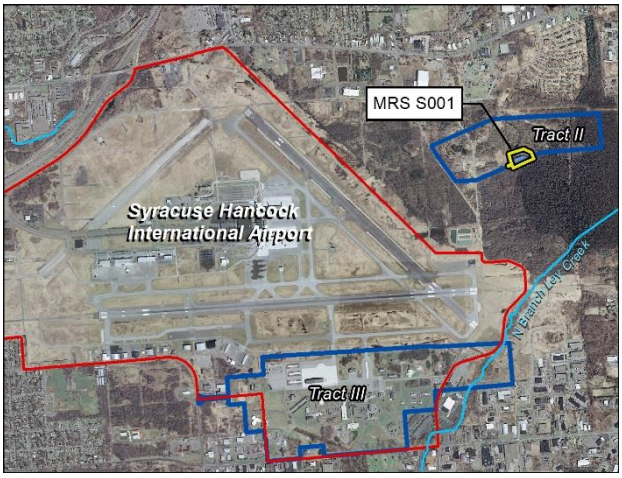

Figure 3. Site Location

Previous Investigations and Response Actions

Once MRS SR001 was no longer operational, response actions were conducted as follows:

(1) The CSE Phase I/II was conducted to confirm that munitions-related impacts occurred at MRS SR001 and to determine the extent of affected environmental media.

(2) **The Engineering Evaluation/Cost Analysis** (EE/CA) was conducted to set the removal action objective, evaluate removal action alternatives, and recommend a preferred alternative.

(3) The NTCRA was conducted to implement the selected removal action alternative.

Comprehensive Site Evaluations

In 2009, a CSE Phase I was performed to identify potential MRAs and evaluate potential releases of MCs to the environment. The CSE Phase I identified a potential for environmental impacts from MCs at MRA SR001. The CSE Phase I identified lead, copper, and iron as the primary MCs of concern. No **munitions and explosives of concern** (MEC) was discovered at the site. The CSE Phase I recommended that a CSE Phase II be conducted at MRA SR001 to assess the potential for environmental releases of MCs.

A CSE Phase II was conducted in September 2010. The CSE Phase II investigation included visual surveys, ex-situ **x-ray fluorescence** (XRF) sampling of soil, a human health risk assessment, and ecological risk assessment. While the CSE Phase I identified copper, lead, and iron as primary MCs of concern, MC sampling conducted during the CSE Phase II did not include the analysis of copper and iron. Based upon experience at other small arms ranges, lead is the most pervasive of these constituents. Therefore, lead soil concentrations were utilized to delineate the extent of contamination within the MRA. The investigation identified inert 40-mm practice grenade debris, smoke canister debris, and non-lethal offensive grenade debris within the practice grenade range and various small arms munitions in the small arms range. XRF soil sampling indicated that lead concentrations in soils within the small arms range at MRS SR001 ranged from 22 to 1,517 mg/kg with 16 samples containing lead concentrations above regulatory criteria. The screening level risk assessments indicated that lead was present at concentrations that may present a human health risk under a residential land use scenario and exceeded the ecological risk screening criterion intended to be protective of soil invertebrates, plants, and wildlife. Based on the results of the CSE Phase II, MRA SR001 was divided into

two MRSs. Further munitions response was recommended for approximately 1.9 acres, designated as MRS SR001 (Figure 4). On March 15, 2013, NFA was approved for MRS SR001a in a memorandum from the Department of Defense (DoD) Explosives Safety Board.

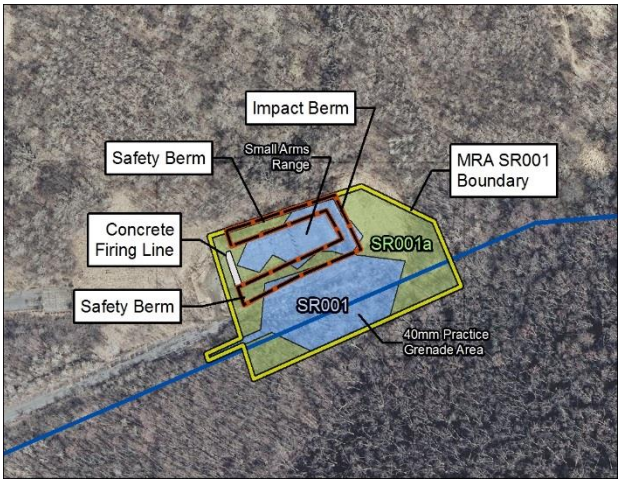

Figure 4. MRS SR001

Engineering Evaluation/Cost Analysis

In 2013, an EE/CA was performed to evaluate removal action alternatives and associated costs to mitigate soil impacts from range-related activities. The **removal action objectives** (RAOs) established for the response action were to protect human health and the environment by conducting a removal action to reduce MCs in soil to levels at or below the clean-up criteria established for the project, as shown in Table 1.

Table 1. Clean-up Criteria

Parameter	Method[a]	Soil Cleanup Objectives Residential Soil (mg/kg)
Copper	6010B	270
Lead	6010B	400

Notes: mg/kg – milligrams per kilogram

During the EE/CA, three response action alternatives were evaluated in terms of their effectiveness, implementability, and cost, including No Action; Institutional Controls; and Excavation and Offsite Disposal. The results of the EE/CA identified the preferred alternative as Excavation and Offsite Disposal since it would permanently remove lead-impacted soil from MRS SR001, reducing future risk to human health and the environment.

Non-Time Critical Removal Action

Between June and August 2014, a NTCRA was conducted to remove 40-mm practice grenade debris and small arms range-impacted soils, mitigating potential future risks to human health and the environment. The NTCRA consisted of the following activities:

- Excavation and offsite disposal of approximately 2,562 tons of metals-impacted soil from MRSs SR001.
- Recovery of approximately 500 pounds of inert 40-mm practice grenade debris, three metal smoke canisters (unknown type), and debris (rubber body) from a non-lethal hand grenade at MRS SR001 during 40-mm practice grenade debris pickup. No MEC was discovered during NTCRA activities, validating historical information and project assumptions of the sites containing inert practice items only. Recovered debris was certified to be free of explosive hazards. The recovered metallic debris was transported offsite for recycling.
- Demolition and removal of 8.56 tons of wooden target debris from MRS SR001, which was transported offsite for disposal.
- Collection of four groundwater samples for analysis of munitions-related metals. Analytical results indicate that groundwater has not been impacted.
- Collection of four confirmatory incremental soil samples within the excavation to confirm that constituent concentrations in remaining soil were below the NYSDEC Soil Cleanup Objectives for lead and copper.
- Backfilling of excavation areas and site restoration.

- A post-remediation evaluation of ecological risk determined that remaining concentrations of metals were within acceptable levels for ecological exposure.
- A MEC **Hazard Assessment Tool** was completed for MRS SR001 to assess the potential exposure hazard to MEC. Since no MEC was identified during the NTCRA there is no potential explosive hazard associated with MEC at MRS SR001.

In the Site-Specific Final Report (SSFR), the MRSPP was updated to reflect that impacted soil and range-related debris had been removed from MRS SR001 eliminating potential human health risks for the sites.

Following the CERCLA process and as detailed in the SSFR, a Proposed Plan and ROD must be prepared and submitted to document NFA for MRS SR001. In addition, a NFA Explosives Safety Submission must be submitted to the DoD Explosives Safety Board for the confirmation of the NFA recommendation.

Summary and Conclusions

Based upon the results of previous investigation, NFA was recommended and approved for MRS SR001a. NFA was approved for MRS SR001a in a memorandum from the DoD Explosives Safety Board dated March 15, 2013.

Results of the NTCRA indicate that small arms-impacted soils within MRS SR001 were successfully removed and disposed of offsite, mitigating the potential risk to human health and the environment. 40-mm practice grenade debris was successfully removed from the surface at the former range. Results of the NTCRA indicate that there are no residual human health or ecological risks within MRS SR001. As documented in the NTCRA SSFR, the MRSPP was updated to reflect a decreased priority status for MRS SR001 from category 6 to 8.

Based on the above information, NFA is recommended for MRS SR001 (unrestricted use) because the RAOs for the NTCRA were satisfied. The information above supports the request for unrestricted reuse of MRS SR001. NYSDEC, who has actively participated with the ANG throughout this project, concurs with this recommendation.

Public Participation

The ANG and NYSDEC have provided information regarding the investigation and removal action activities of MRS to the public through public meetings, public notices, and the IR. The ANG and the NYSDEC encourage the public to gain an understanding of these sites and the investigation and cleanup activities that have been conducted.

Glossary of Terms

Administrative Record: Collection of documents that contain information and reports developed during the investigation of the site, which are used to select the preferred remedy. Documents in the Administrative Record serve as the official record for a site, up to the Record of Decision. Documents from the Administrative Record are located at the Information Repository for public review.

Comprehensive Environmental Response Compensation and Liability Act (CERCLA): A United States federal law passed in 1980, which is commonly known as Superfund. It provides for liability, compensation, cleanup, and emergency response in connection with the cleanup of abandoned hazardous waste sites that endanger public health and safety or the environment.

Comprehensive Site Evaluation: A United States Air Force process that investigates explosive safety issues created by the potential presence of Munitions and Explosives of Concern, as well as the environmental hazards posed by the presence of munitions constituents.

Engineering Evaluation/Cost Analysis: Process which identifies the objectives of the removal action and analyzes the effectiveness, implementability, and cost of various alternatives that may satisfy these objectives.

Hazard Assessment Tool: A tool to evaluate the existing and potential conditions at a Munitions Response Site that can lead to an explosive event when a member of the general public (i.e., receptor) interacts with the item. The evaluation considers the likelihood and the severity of the event that may occur.

Information Repository: All documents that are considered, or relied on, in selecting and implementing the response action at a site.

Munitions Constituent: Munitions Constituents include any material originating from unexploded ordnance, discarded military munitions, or other military munitions, including explosive and non-explosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions (10 U.S.C. 27 10(e)(3)).

Munitions Debris: Remnants of munitions (e.g., fragments, penetrators, projectiles, shell casings, links, fins) remaining after munitions use, demilitarization, or disposal.

Munitions and Explosives of Concern: This term, which distinguishes specific categories of military munitions that may pose unique explosives safety risks means: (A) Unexploded ordnance, as defined in 10 U.S.C. 101(e)(5); (B) Discarded military munitions, as defined in 10 U.S.C. 2710(e)(2); or (C) Munitions constituents, as defined in 10 U.S.C. 2710(e)(3), present in high enough concentrations to pose an explosive hazard.

Military Munitions Response Program: A program created by Congress in 2001 under the Defense Environmental Restoration Program to develop and maintain an inventory of defense sites which are known or suspected to contain unexploded ordnance, discarded military munitions, or munitions constituents; create a prioritization system for the sites; and establish a funding program element for the program.

Munitions Response Area: Any area on a defense site that is known or suspected to contain unexploded ordnance, discarded military munitions, or munitions constituents.

Munitions Response Site: A discrete location of a Munitions Response Area known to require a munitions response.

Munitions Response Site Prioritization Protocol: An application which results in determination of a relative priority for each MRS based on the potential risk posed at each MRS relative to the potential risks posed at other MRS. The MRSPP's application results in assignment of a relative priority of 1 to 8, with 1 representing the highest possible relative risk category among the scored MRS. As a matter of DoD policy, an MRS with a higher relative priority (potential risk) will be addressed before an MRS with lower relative priority. Application of the MRSPP may also result in assignment of one of three "alternative ratings." These are: "No Longer Required," "No Known or Suspected Hazard," and "Evaluation Pending."

National Oil and Hazardous Substances Pollution Contingency Plan: National Oil and Hazardous Substances Pollution Contingency Plan. A Federal plan that provides the organizational structure and procedures for preparing for and responding to discharges of oil and releases of hazardous substances, pollutants, and contaminants.

No Further Action: A determination there are no contaminants present at the site; or that any contaminants present at the site or that have migrated from the site have been remediated in accordance with applicable remediation statutes, rules and guidance such that no further action is necessary.

Non-Time Critical Removal Action: An action are at a site when the lead Agency determines, based on the site evaluation, that a removal action is appropriate, and a planning period of at least six months is available before on-site activities must begin.

New York State Department of Environmental Conservation: The state agency that sets and enforces rules and standards that protect human health and the environment.

Proposed Plan: A public participation requirement where the preferred cleanup strategy and the rationale for the preference. The proposed plan actively solicits public review under agency consideration.

Remedial Action Objectives: Specific goals that are established on a project-specific basis to protect human health and the environment.

Record of Decision: A public document that explains which cleanup alternatives will be used to clean up a site.

X-Ray Florescence: An x-ray instrument used to analyze the composition of various materials. During the Non-Time Critical Removal Action, XRF was used to determine chemical concentrations of munitions-related metals (e.g., lead and copper) to guide excavation efforts.

Acronyms

ANG	Air National Guard
AR	Administrative Record
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CSE	Comprehensive Site Evaluation
DoD	Department of Defense
EE/CA	Engineering Evaluation/Cost Analysis
Hancock Field	Hancock Field Air National Guard Base
IR	Information Repository
MC	Munitions Constituent
MEC	Munitions and Explosives of Concern
mm	millimeter(s)
MRA	Munitions Response Area
MRS	Munitions Response Site
MRSPP	Munitions Response Site Prioritization Protocol
MMRP	Military Munitions Response Program
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No Further Action
NTCRA	Non-Time Critical Removal Action
NYSDEC	New York State Department of Environmental Conservation
RAO	Remedial Action Objectives
ROD	Record of Decision
SSFR	Site-Specific Final Report
XRF	x-ray florescence

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Proposed Plan Comment Form

Hancock Field Air National Guard Base
Munitions Response Sites SR001 and SR002

Your input on the Proposed Plan for MRS SR001 is important to the ANG. Comments provided by the public are valuable in helping the ANG evaluate the cleanup remedy implemented at the site. You may use the space below to write your comments, then tri-fold and mail. Comments must be postmarked by July 6, 2016. If you have questions about the comment period, please contact:

Jody Murata
NGB/A7OR
3501 Fetchet Avenue
Joint Base Andrews, MD 20762-5157

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Name:_____

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Jody Murata
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