

5.0 CERFA Letter Report

5.1 Executive Summary

This letter report presents the results of the Community Environmental Response Facilitation Act (CERFA) investigation conducted for the Hospital Hill and POL Hill portions of the Hamilton Army Airfield (HAAF), a U.S. Government property selected for closure in 1993 by the Base Realignment and Closure (BRAC) Commission under Public Laws 100-526 and 101-510. Under CERFA (Public Law 102-246), Federal agencies are required to expeditiously identify real property that can be immediately reused and redeveloped. Satisfying this objective requires the identification of real property where no hazardous substances or petroleum products regulated by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) were stored for 1 year or more, or known to have been released or disposed.

Information in this letter report was obtained during the preparation of the Environmental Baseline Survey (EBS) for the Hospital Hill and POL Hill BRAC parcels at HAAF and was current as of December 2000. This information was used to divide the parcels into one of seven categories. These categories, with results of the categorization process are presented in Table 5-1.

TABLE 5-1
DoD Environmental Condition Categories

Category	Definition	BRAC Parcel
1	Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).	
2	Areas where only release or disposal of petroleum products has occurred.	1-Hospital Hill 2-POL Hill
3	Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.	
4	Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.	
BRAC Parcels in the following DoD categories are not currently suitable for transfer:		
5	Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.	
6	Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.	
7	Areas that are not evaluated or require additional evaluation.	

Areas or activities that related to disclosure-related environmental or safety issues, including asbestos, lead-based paint, PCB, UXO, and radon issues, have also been identified within the BRAC Parcels.

This letter report contains a figure that summarizes the categorization of the parcels on the basis of the seven DoD categories listed in Table 5-1. This report should be read only in conjunction with the complete EBS report for these parcels. The EBS report provides the relevant environmental history to substantiate the parcel categorization. This report does not address other property transfer requirements that may be applicable under the National Environmental Policy Act (NEPA), nor does it address natural resource considerations such as the threat to plant or animal life.

5.2 Summary of Findings

Property categorization factors are hazardous substances or conditions that, if present, may pose a threat to human health or the environment. These substances or conditions include, but are not limited to, hazardous substances as defined in CERCLA Section 101(14) and petroleum substances. The categorization factors can be classified into three general groups: Storage and Use; Release; and Disposal. In addition to property categorization factors, this document examines facility disclosure factors, also referred to as non-CERCLA issues. Facility disclosure factors are hazardous substances or petroleum substances that do not pose a threat to the well being of the human community and environment if properly managed and maintained. They are not used in determining the DoD Category, but are considered in determining whether a parcel is suitable for transfer or lease. These items include asbestos, lead-based paints, PCBs, UXO, and radon.

The property classifications are illustrated in Figure 5-1, CERFA Map. The basis for the categorization process is presented in Table 5-2, CERFA Map Table. This table provides a brief summary of the key findings for each BRAC Parcel.

5.2.1 CERFA Uncontaminated Parcels

CERFA (CERFA Section 120(h)) was enacted to facilitate the rapid return of uncontaminated properties identified during the BRAC process to the local communities. "Uncontaminated property" (as amended by the FY97 Defense Authorization Act) refers to real property where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas). This definition includes BRAC parcels that were placed into Category 1.

As presented in Table 5-1, neither BRAC parcels 1 or 2 (Hospital Hill or POL Hill) are considered to satisfy these CERFA requirements for uncontaminated parcels.

5.2.2 Non-CERFA Parcels

Parcels within categories 1 through 4 are considered suitable for transfer by deed. Parcels in categories 5 through 7 can be transferred to another federal entity, but are not considered to be suitable for transfer by deed. Leases would be considered on a case-by-case basis for properties within all seven categories. Both Hospital Hill and POL Hill were assigned Category 2 and are considered suitable for transfer by deed. The acreages for each of the DoD categories are provided in Table 5-3, Acreage Summary Table. The non-CERFA uncontaminated parcels total approximately 11.25 acres.

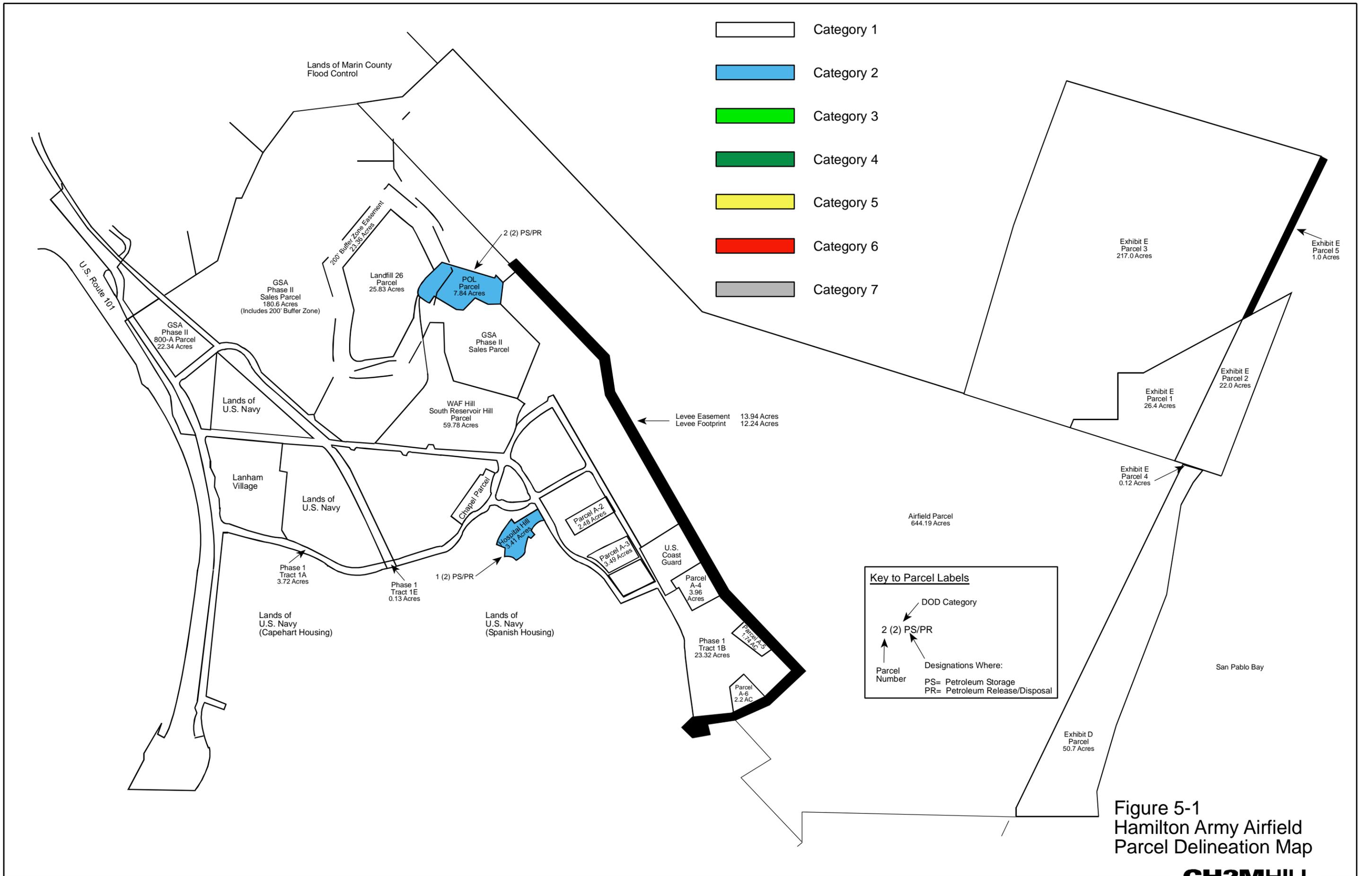


Figure 5-1
Hamilton Army Airfield
Parcel Delineation Map

TABLE 5-2
CERFA Map Summary

BRAC Parcel	Location	Parcel Size	DoD Category	Basis (Including Source Of Evidence And Reference)	EBS Source of Evidence	Remediation or Mitigation
1	Hospital Hill	3.41 acres	2	<p>Building 510 and 521 were utilized as a medical/dental clinic and a dental prosthetic laboratory, respectively. Two 750-gallon diesel fuel USTs were identified, one at each building location. The UST at Building 510 was removed in April 1997, and the UST at Building 521 was removed in January 1997. Following removal activities, investigations indicated the presence of TPH in soils beneath each UST. Additional studies showed groundwater was not adversely impacted by TPH.</p>	<p>RWQCB, August 18, 2000 Woodward-Clyde, 1995b</p>	<p>Tanks and TPH contaminated soil have been removed. Approximately 960 cubic yards of TPH contaminated soil was removed at each UST location. No additional sampling or remediation is required. RWQCB has approved closure.</p>
2	POL Hill	7.84 acres	2	<p>POL Hill was used as the base fuel center from 1942 until some time prior to 1986. Numerous above ground and below ground storage tanks were formerly located in this area including:</p> <ul style="list-style-type: none"> – One 750-gallon UST (contents not known) – Twenty 25,000-gallon JP-4 ASTs – One 840,000-gallon JP-4 AST – One 20,000-gallon JP-4 AST – One 25,000-gallon Mogas & JP-4 AST – One 600-gallon AST (diesel) – One 2,500-gallon AST (diesel) <p>Investigations indicated the presence of TPH contamination in soil and groundwater. Some soil contamination remains; however, it is not physically possible to remove the contamination. Groundwater contamination is present beneath the former location of the 840,000-gallon JP-4 AST.</p>	<p>ESI, 1993 HLA, 1991 IT, 1987 IT, 1999a,b IT, 1997a,b Woodward-Clyde, 1995a</p>	<p>All of the ASTs, USTs and associated piping, pump stations, structures and equipment were removed between 1986 and 1993. To the extent physically possible, soil contaminated with TPH in excess of 100 ppm has been removed. The extent of TPH contamination in soil and groundwater is well characterized. No additional sampling is required. Groundwater monitoring allowing natural attenuation of TPH contaminants is the selected remedy for this location.</p>

5.2.3 Disclosure Factors

As stated above, the disclosure factors are not used in categorizing the property. They are, however, important in determining whether or not reuse of a parcel would pose an adverse risk to human health or the environment. Therefore, these factors are important when considering whether the property is suitable for transfer or lease and the restrictions that might apply. Table 5-3 presents a summary of the presence (or absence) of these factors for Hospital Hill and POL Hill. In some cases, studies have not been performed addressing the factor. For example, comprehensive lead-based paint studies have not been performed. However, assumptions can be made as to the likely presence of these substances based on the age of the buildings. The use of lead-based paint was discontinued in 1977 so buildings constructed prior to 1978 are generally assumed to contain lead-based paint. When the factor is assumed to occur, it is so indicated in the table.

5.3 Data Gaps

Readily available information on the environmental condition of HAAF has been considered and documented in this EBS.

TABLE 5-3
Summary of Disclosure Factors

BRAC Parcel	DoD Category	Asbestos	Lead-based Paint	PCB	Radon	UXO	Radio-nuclides
1 (Hospital Hill)	2	/	P	/			/
2 (POL Hill)	2	/	P	/			

✓ material is, or has been, present
 P presence is likely or was likely prior to building demolition
 Radon is not present at HAAF
 UXO is not present at Hospital Hill nor POL Hill