
Final

Finding of Suitability to Transfer Former Hamilton Army Airfield Levee Parcel

Prepared for
Department of the Army



April 2004

CH2MHILL

2485 Natomas Park Drive, Suite 600
Sacramento, CA 95833

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Former Hamilton Army Airfield
Levee Parcel**

Submitted to
Department of the Army

April 2004

CH2MHILL

FINDING OF SUITABILITY TO TRANSFER

Former Hamilton Army Airfield Levee Parcel April 2004

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of certain property (the "Property"), Levee Parcel, at the former Hamilton Army Airfield (HAAF) for transfer to the City of Novato (City), California for continued use as a levee footprint consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DoD) policy. In addition, the FOST identifies use restrictions as specified in the attached Environmental Protection Provisions necessary to protect human health or the environment after such transfer.

2. PROPERTY DESCRIPTION

The property to be transferred (Levee Parcel) consists of 13.21 acres. One former building/structure, Building 93 (Table 1), was associated with this Property. The Property was primarily a transitional area between the hangars and the runway and now has a levee constructed on it. The New Hamilton Partnership was granted an easement for the Levee Parcel and in September 1996 constructed a levee on the parcel. The levee was then turned over to the City who now owns and maintains the levee. The City will accept fee title to the land under the levee following the FOST process. A site map showing the boundary of the Property to be transferred is provided in Enclosure 1. A legal description of the Property to be transferred is provided in Enclosure 2.

TABLE 1
List of Past and Present Structures on the Levee Parcel

Building/ Structure	Year Built	Area (square feet)	Historical Use/Status
93	Circa 1945	78,125	Aerial photographs indicate Building 93 was constructed circa 1945 and demolished circa 1973. The northwest third of the former building lay across the Property. Building 93 was a large building used as a terminal for assembling and transporting military personnel. A review of building plans showed it contained a cafeteria, restrooms, barbershop, showers, offices, and waiting/sitting areas. No aircraft maintenance activities are known or documented to have been conducted in this building.

3. ENVIRONMENTAL CONDITION OF THE PROPERTY

A determination of the environmental condition of the Property has been made based on the following documents:

- (1) the Final Community Environmental Response Facilitation Act (CERFA) Report for the Hamilton Army Airfield, prepared by Earth Tech, dated April 1994;
- (2) the Environmental Baseline Survey (EBS) for the Main Airfield Parcel, prepared by CH2M HILL, dated June 2003;
- (3) the Baseline Human Health Risk Assessment, prepared by Engineering Science, Inc., dated July 1993;
- (4) the Environmental Assessment for the Closure and Realignment of Hamilton Army Airfield, prepared by Jones and Stokes Associates, Inc., dated September 1991;
- (5) the Environmental Impact Statement for Hamilton Army Airfield Disposal and Reuse, prepared by the U.S. Army Corps of Engineers (USACE) with assistance from Jones and Stokes Associates, Inc., dated January 1995;
- (6) the Environmental Assessment, Remedial Work on Base Realignment and Closure (BRAC) Property, prepared by USACE, dated March 1995;
- (7) the Record of Decision/Remedial Action Plan (ROD/RAP) for the Main Airfield Parcel, prepared by the US Army, Department of Toxic Substance Control (DTSC), and the Regional Water Quality Control Board (RWQCB) with assistance from CH2M HILL, dated August 2003;
- (8) the Comprehensive Remedial Investigation Report, prepared by IT Corporation, dated April 1999;
- (9) the GSA Phase I Sale Area (excluding Lot 7) Remedial Investigation, prepared by Woodward-Clyde Federal Services (WCFS), dated May 1995;
- (10) the Closure Report, GSA Phase I Sale Area, Lot 7 and Outparcels A-5 and A-6, HAAF, prepared by WCFS and IT Corporation, dated December 1995;
- (11) the Addendum to the Closure Report, GSA Phase I Sale Area, HAAF, prepared by WCFS and IT Corporation, dated May 1996;
- (12) the GSA Phase II Sale Area 800B and Ammo Hill Site Investigation Report, prepared by IT Corporation, dated March 1998;
- (13) the EBS for Outparcel A-4 prepared by CH2M HILL, dated November 2001;
- (14) the EBS for Hospital Hill and POL Hill, prepared by CH2M HILL, dated November 2001.
- (15) the Hamilton Army Airfield GSA Phase I Sale Area Cleanup Goals for Soil and Groundwater, prepared by WCFS, dated February 24, 1995
- (16) the Certification: Hamilton Army Airfield – GSA Sale Parcel, Novato, California letter between Anthony Landis, DTSC and Colonel John N. Reese, Commander, Sacramento District, US Army Corps of Engineers, dated May 19, 1995.

- (17) the Underground Storage Tank (UST) Case Closure, Phase I GSA Sale Property (Exclusive of Lot 7 and the areas under Buildings #309, #312, #318, #345, #346, #348, #405, and #410), Hamilton Army Airfield, Novato, California, letter between Richard K. McMurtry, California Regional Water Quality Control Board, and Tony Landis, DTSC, dated May 19, 1994.
- (18) the Certification: Hamilton Army Airfield – GSA Sale Parcel letter between Anthony Landis, DTSC and Colonel John N. Reese, Commander, Sacramento District, US Army Corps of Engineers, dated February 16, 1996.
- (19) the Hamilton Army Airfield, Record of Decision/Remedial Action Plan, letter between Anthony Landis, DTSC and Colonel Douglas Baker, US Army, BRAC division, and Loretta K. Barsamian, California Regional Water Quality Control Board, dated September 12, 2003.
- (20) the Outparcel A-4 Closure Report for the BRAC Property, Hamilton Army Airfield, Novato, California, prepared by IT Corporation, dated August 10, 2001.
- (21) the Draft Final Annual Groundwater Monitoring Report for the March 2003 Sampling Event at POL Hill, Hamilton Army Airfield, Novato, California, prepared by SOTA Environmental Technology, Inc., dated December 11, 2003.
- (22) the Underground Storage Tank (UST) Case Closure, POL HILL, Hamilton Army Airfield, Novato, California, letter between Bruce H. Wolfe, California Regional Water Quality Control Board, and Ed Keller, Department of the Army, BRAC division, dated February 10, 2004.

The information provided is a result of a complete search of federal, state and local agency files during the development of these environmental studies.

3.1 Environmental Condition of Property Categories

The DoD Environmental Condition of Property (ECP) Category for the Property is as follows:

ECP Category 2: Levee Parcel

A summary of the ECP Category for the Property is provided in Enclosure 3: Description of Property. The DoD ECP categories are defined in Enclosure 3, in Table E3-1, Identification of Property and Environmental Condition.

3.2 Storage, Release, or Disposal of Hazardous Substances

There is no evidence that hazardous substances were stored, released, or disposed at the Property in excess of the reportable quantities listed in 40 CFR Part 373. Accordingly, there is no need for notification of hazardous substance storage, release, treatment, or disposal.

3.3 Petroleum and Petroleum Products

Releases of petroleum and petroleum products within the Property were identified in association with the Onshore Fuel Line (ONSFL), which crosses the Property and two adjacent sites (Outparcel A-5 and Outparcel A-6) whose remedial excavations extended into the Property. Petroleum releases within the intersection of these areas and the Property are summarized below. Remediation and regulatory approval of closure for these areas are discussed in Section 4.

Onshore Fuel Line

The ONSFL was used to transport aviation gasoline and JP-4 liquid fuels from the Offshore Fuel System to several locations around the airfield from 1945 to 1975. The fuel lines were removed in 1995.

The ONSFL intersected the Property in three locations. These areas of intersection are generally shown in Enclosure 1 and are specifically shown in figures located in reference 8 as cited above. Two of the three fuel lines were located within storm drain lines that intersected the Property. The remaining fuel line that intersected the Property was referred to as Hangar Fuel Line B, and intersected the Property approximately 400 feet northeast of former Building 344. There were releases of petroleum products within the former location of the Hangar Fuel Line B intersection with the Property. The remaining two locations (fuel lines within storm drains) did not have releases of petroleum products.

Outparcel A-5

Outparcel A-5 is located adjacent to the Property north of Building 95 (see reference 10, figure 6-8). The Outparcel was primarily paved with asphalt and was used as an aircraft wash rack. Numerous investigations and remedial action were taken at this outparcel in conjunction with the General Services Administration (GSA) Phase I Program. Petroleum releases to soil at Outparcel A-5 extended into the Property as documented in the GSA Phase I Sale Area, Lot 7 and Outparcels A-5 and A-6 Closure Report (reference 10). The general location of petroleum releases associated with Outparcel A-5 are shown in Enclosure 1 and are specifically shown in reference 10. Closure of this area is documented in reference 18.

Outparcel A-6

Outparcel A-6 is located adjacent to the Property northwest of Building 86 (see reference 10, figure 6-9). This outparcel was primarily paved and was used as an aircraft maintenance and storage area. Numerous investigations and remedial action were taken at this Outparcel in conjunction with the GSA Phase I Program. Petroleum releases to soil at Outparcel A-6 extended into the Property as documented in the GSA Phase I Sale Area, Lot 7 and Outparcels A-5 and A-6 Closure Report (reference 10). The general location of petroleum releases associated with Outparcel A-6 are shown in Enclosure 1 and are specifically shown in reference 10. Closure of this area is documented in reference 18.

A summary of the petroleum product activities on the Property is provided in Enclosure 4, in table E4-1, Notice of Petroleum Product Storage, Release, or Disposal.

3.4 Polychlorinated biphenyl (PCB) Equipment

There is no equipment containing PCBs located on the Property. Accordingly, there is no need for notification of PCB equipment use.

3.5 Asbestos

Former Building 93 is the only structure associated with the Property. The building was constructed circa 1945 and was used as a passenger terminal. It is not known if the structure contained asbestos-containing material (ACM). The building was surrounded by pavement and was demolished circa 1973. Visual observations of the building foundation in 1995 did not indicate the presence of ACM. There are no known risks to human health and the environment associated with ACM at the Property. Accordingly, there is no need for notification of ACM.

3.6 Lead-Based Paint (LBP)

Based on the age of the building (constructed prior to 1978), LBP is presumed to have been used in the construction and maintenance of Building 93. The building was surrounded by pavement; therefore, no release of LBP to soil would be expected. No buildings remain on the Property. Since no future residential reuse is anticipated, no soil sampling was performed to identify the presence of LBP in the soil. The deed will include the LBP warning and covenant provided in the Environmental Protection Provisions (Enclosure 5).

3.7 Radiological Materials

There is no evidence that radioactive material or sources were used or stored on the Property.

3.8 Radon

A radon survey has not been conducted on HAAF BRAC property. Interviews with HAAF personnel, a review of applicable environmental documents, and adjacent property radon survey results indicate that radon is not a concern at HAAF. Test data and survey results for the adjacent Navy property (housing) indicated radon below US Environmental Protection Agency (USEPA) recommended action levels of 4 picocuries per liter (pCi/L). Information provided by US Geologic Survey representatives indicate that radon is not found in the region as a result of the geology of the area. Therefore, radon is not considered to be an environmental concern at HAAF (reference1).

3.9 Munitions and Explosives of Concern

A review of available records and information indicates that the property is not known to contain military munitions of concern (MEC). Though MEC is not known to be present, Environmental Protection Provisions will be included in the deed for this transfer in case, MEC is discovered on the property (Enclosure 5).

3.10 Other Hazardous Conditions

There are no other hazardous conditions that require remediation or a response action for the Property to be suitable for transfer for the intended use.

3.11 Adjacent Hazardous Conditions

A review of the documents listed in Section 3.0 indicates adjacent properties with existing or previous hazardous conditions include: the Main Airfield Parcel; POL Hill; GSA Phase I Sale Area and Outparcels A-4, A-5, and A-6.

Sources of contamination in Outparcels A-4, A-5, and A-6 included fuel lines, sanitary sewer lines, fuel storage tanks, aircraft maintenance, and aircraft wash racks. Types of contaminants included Total Petroleum Hydrocarbons (TPH) and solvents. Cleanup actions have been completed at Outparcels A-4, A-5, and A-6 in accordance with site specific remediation plans and under regulatory oversight (references 10, 13, and 20). Outparcel A-4 was transferred to the New Hamilton Partners for commercial use. Outparcel A-5 was transferred to New Hamilton Partners for residential use. Outparcel A-6 was transferred to New Hamilton Partners for residential use. Closure of these areas is documented in reference 18.

Sources of contamination in the GSA Phase I Sale Area including Lot 7 included underground fuel tanks, transformers, aircraft hangers, jet engine test facilities, maintenance

shops, and fuel distribution systems. Types of contamination included petroleum, solvents, metals, PCBs, and Volatile Organic Compounds. The GSA Phase I Sale Area and Lot 7 have been remediated and transferred to the New Hamilton Partners for residential and commercial use. Closure of these areas is documented in references 9, 10, 16, 17, and 18.

Sources of contamination in the Main Airfield Parcel included fuel lines, revetments, spoil piles, generators, drainage ditches, aircraft maintenance areas, hangers, runways, and storage areas. Types of contaminants included metals, semi-volatile organic compounds, petroleum hydrocarbons, pesticides, herbicides, PCBs and dioxins. The Main Airfield Parcel has been transferred to the State of California for open space for the Hamilton Wetland Restoration Project. Areas within the Main Airfield requiring remedial action will be remediated in accordance with the ROD/RAP for the Main Airfield Parcel. Details regarding this adjacent property can be found in reference 7. Approval of the ROD/RAP is documented in reference 19.

Sources of contamination at the POL Hill include fuel storage tanks and pipelines for fuel distribution. Types of contaminants at POL Hill include petroleum substances. POL Hill will be transferred to the City of Novato for recreation/open space. Closure and Corrective Action Plans to address petroleum contamination at POL Hill have been approved by the appropriate regulatory agencies (reference 22). Petroleum contaminated soil has been remediated at this site. Groundwater conditions at POL Hill are shown to be stable and do not impact the Property. Details regarding this adjacent property can be found in reference 20.

Stormwater runoff from the adjacent sites is collected and discharged through the levee onto the adjacent Main Airfield Parcel at two locations by newly constructed pump stations. Drainage features on the Main Airfield Parcel convey the stormwater away from the Levee Parcel.

Currently available data indicate none of the adjacent sites adversely impact the Property.

4. REMEDIATION

This section discusses remedial activities that have been conducted within the Property.

Onshore Fuel Line

The ONSFL was investigated and/or remediated between the years of 1993 and 1997. In 1995, Allied Technology Group removed the ONSFL system. During the onshore investigations, soil samples were collected at target locations along the fuel line. Results from the sampling indicated that where contamination was found it was generally found within 20 feet of the former fuel line trench.

A portion of the former Hangar Fuel Line B within the Property was remediated due to the presence of soil impacted with fuel components at concentrations above the GSA Phase I residential cleanup goals (RCGs). The RCGs are protective of human health because they are risk-based concentrations. The compounds that were detected above the RCGs were considered chemicals of concern (COCs). The COCs identified along the former Hangar Fuel Line B included unknown purgeable hydrocarbons (UPH), benzene, toluene, ethylbenzene, and xylene (BTEX). Following the detections of COCs, an excavation of the impacted area within the Property area was performed. Approximately 700 cubic yards of soil along former Hangar Fuel Line B within the Property was excavated. Confirmation samples resulted in concentrations of UPH and BTEX remaining in the former Hangar Fuel Line B within the Property that were below the RCGs (reference 8).

The Army and the RWQCB have agreed that no further actions are necessary to address residual petroleum hydrocarbons in soil at the former Hangar Fuel Line B within the Property.

Outparcels A-5 and A-6

Remedial activities for Outparcels A-5 and A-6 were conducted in 1995. During remedial activities soil and groundwater samples were collected, soil was excavated and confirmation samples were collected throughout the Outparcels including the portions of these parcels that intersected the Property. Documentation for these activities did not estimate specific excavation volumes for the areas within the Property. Following excavation, sampling results indicated releases of TPH from Outparcels A-5 and A-6 had impacted soil within the Property. The Closure Report for Outparcels A-5 and A-6 indicated that this soil impacted by TPH on the Property would be addressed separate from Outparcels A-5 and A-6 through a separate project. References 7 and 10 document the remedial activities for Outparcels A-5 and A-6 and the portions of these areas which intersect the Property.

The portion of the Property affected by TPH releases from Outparcel A-5 was further evaluated as part of the Tarmac East of Outparcel A-5 in the Main Airfield Parcel ROD/RAP. The ROD/RAP determined that no further remedial action was required at the Tarmac East of Outparcel A-5 (including the portion within the Property) to protect human health and the environment. The RWQCB and the DTSC concurred with the findings of the ROD/RAP (reference 19).

The portion of the Property affected by TPH releases from Outparcel A-6 was further evaluated as part of the Building 82/87/92/94 Area in the Main Airfield Parcel ROD/RAP. Although the ROD/RAP determined that remedial action was required within specific portions of the Building 82/87/92/94 Area, no remedial action is required within the portion that includes the Property. The RWQCB and the DDTSC concurred with the findings of the ROD/RAP (reference 19).

5. REGULATORY/PUBLIC COORDINATION

The USEPA Region 9, California DTSC, California RWQCB, San Francisco Bay Region, and the public were notified of the intent to sign the FOST. The FOST completed a 30-day public review for which a public notice was published in the *Marin Independent Journal* and the *Novato Advance*. A public meeting was held on January 6, 2004. The Final FOST is available at the following locations:

Hamilton Administrative Record Library
Hamilton Army Airfield
1 Burma Road
Novato, CA 94949
415-883-6386

The Main Branch of the Novato Public Library
1720 Novato Blvd.
Novato, CA 94947
415-898-4623

Regulatory/public comments received during the FOST development were reviewed and incorporated as appropriate in the Final FOST. A copy of the regulatory/public comments is provided (Enclosure 6).

6. NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE AND CONSISTENCY WITH LOCAL REUSE PLAN

The environmental impacts associated with the proposed transfer of the Property have been analyzed in accordance with the National Environmental Policy Act (NEPA). The results of this analysis have been documented in the Environmental Assessment, Remedial Work on BRAC Property, dated March 1995 and the Final Environmental Impact Statement, Hamilton Army Airfield Disposal and Reuse, dated December 1996. Any encumbrances or conditions identified in such analysis as necessary to protect human health or the environment have been incorporated into the FOST. In addition, the proposed transfer is consistent with the intended reuse of the Property, which is for continued use as a levee footprint.

7. ENVIRONMENTAL PROTECTION PROVISIONS

On the basis of the above results from the Main Airfield Parcel EBS and other environmental studies and in consideration of the intended use of the Property, certain terms and conditions are required for the proposed transfer. These terms and conditions are set forth in the attached Environmental Protection Provisions (Enclosure 5) and will be included in the deed.

8. FINDINGS OF SUITABILITY TO TRANSFER

Based on the above information, I conclude that all DoD requirements to reach a FINDING OF SUITABILITY TO TRANSFER the property to the City for continued use as a levee footprint have been met, subject to the terms and conditions set forth in this document. All removal or remedial actions necessary to protect human health and the environment have been taken and the property is transferable under CERCLA section 120(h)(3). In addition, the deed for this transaction will also contain:

- The covenant under CERCLA §120(h)(3)(A)(ii)(I) warranting that all remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances and petroleum products remaining on the Property has been taken before the date of transfer.
- The covenant under CERCLA §120(h)(3)(A)(ii)(II) warranting that any remedial action under CERCLA found to be necessary after the date of transfer with respect to such hazardous substances remaining on the property shall be conducted by the United States.
- The clause as required by CERCLA §120(h)(3)(A)(iii) granting the United States access to the property in any case in which remedial action or corrective action is found to be necessary after the date of transfer.

As required under the CERCLA Section 120(h) and DoD FOST Guidance, notification of hazardous substance activities and petroleum product activities shall be provided in the deed (see Enclosure 4 — Notice of Petroleum Storage, Release, or Disposal).

As required under the CERCLA Section 120(h) and DoD FOST Guidance, notification of hazardous substance activities and petroleum product activities shall be provided in the deed (see Enclosure 4 — Notice of Petroleum Storage, Release, or Disposal).

UNITED STATES OF AMERICA

By: Donald L. Bohannon

for Glynn D. Ryan
Chief, Atlanta Field Office
Headquarters Department of the Army
Base Realignment and Closure
Fort McPherson, GA

6 Enclosures:

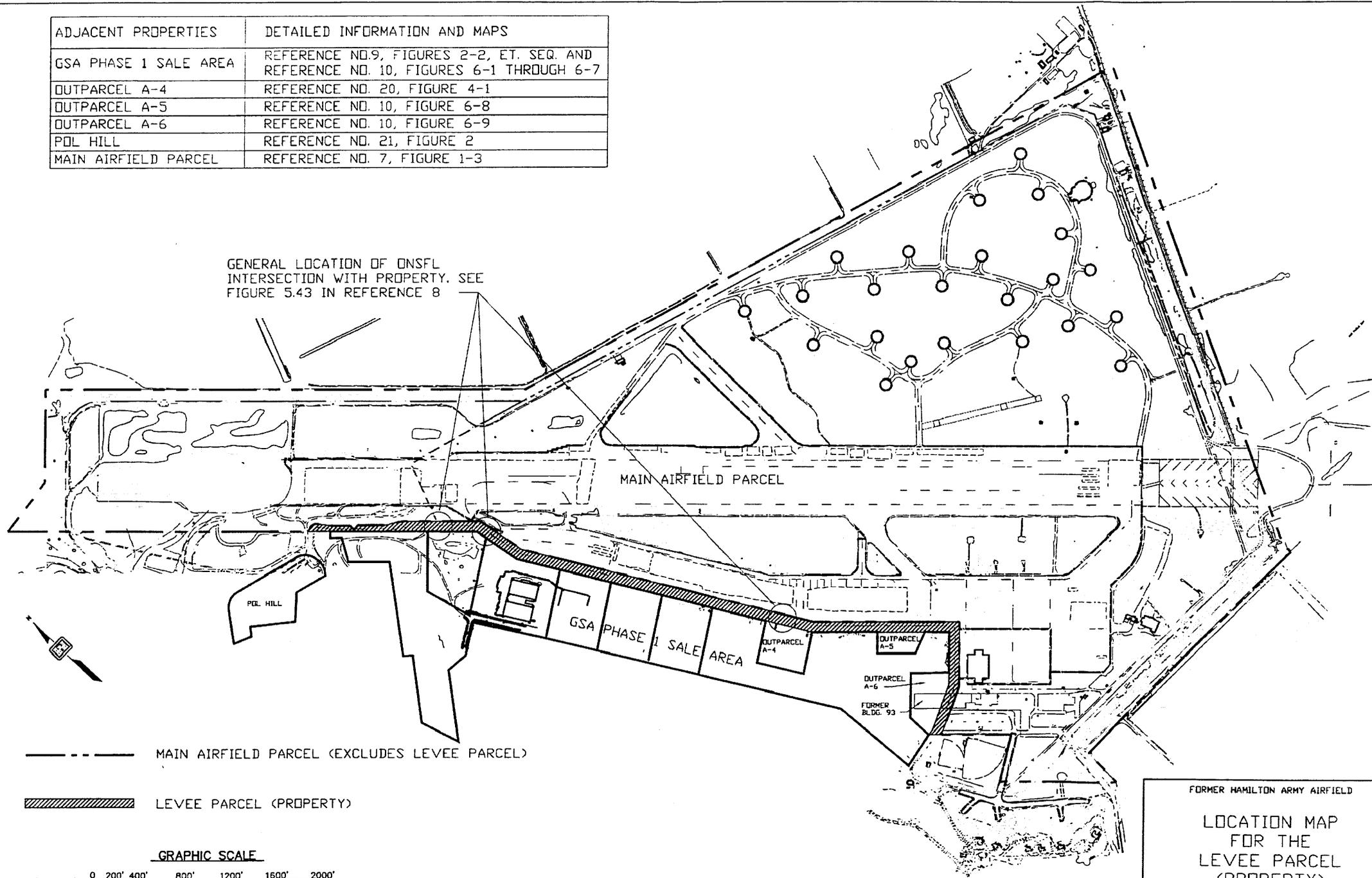
- Encl 1 Figure 1 – –Location Map for the Levee Parcel
- Encl 2 Legal Description of the Property
- Encl 3 Description of Property (Identification of Property and Environmental Condition)
- Encl 4 Notice of Petroleum Product Storage, Release, or Disposal
- Encl 5 Environmental Protection Provisions
- Encl 6 Regulatory/Public Comments and Installation Position on Unresolved Comments

ENCLOSURE 1

Figure 1, Location Map Property - Levee Parcel

ADJACENT PROPERTIES	DETAILED INFORMATION AND MAPS
GSA PHASE 1 SALE AREA	REFERENCE NO.9, FIGURES 2-2, ET. SEQ. AND REFERENCE NO. 10, FIGURES 6-1 THROUGH 6-7
OUTPARCEL A-4	REFERENCE NO. 20, FIGURE 4-1
OUTPARCEL A-5	REFERENCE NO. 10, FIGURE 6-8
OUTPARCEL A-6	REFERENCE NO. 10, FIGURE 6-9
POL HILL	REFERENCE NO. 21, FIGURE 2
MAIN AIRFIELD PARCEL	REFERENCE NO. 7, FIGURE 1-3

GENERAL LOCATION OF DNSFL INTERSECTION WITH PROPERTY. SEE FIGURE 5.43 IN REFERENCE 8



----- MAIN AIRFIELD PARCEL (EXCLUDES LEVEE PARCEL)

▨ LEVEE PARCEL (PROPERTY)

GRAPHIC SCALE

1" = 400' 0 200' 400' 800' 1200' 1600' 2000'

FORMER HAMILTON ARMY AIRFIELD

LOCATION MAP
FOR THE
LEVEE PARCEL
(PROPERTY)

ENCLOSURE 2
LEGAL DESCRIPTION OF PROPERTY

HAMILTON ARMY AIR FIELD – LEVEE PARCEL

Being a portion of the lands of the United States Army lying within the former Hamilton Army Air Field, City of Novato, State of California, Section 34, Township 3 North, Range 6 West, Mount Diablo Base and Meridian, more particularly described as follows;

Commencing, for reference, at a found three-inch brass cap monument stamped LS 3552, at the terminus of the courses shown as N 59°55'00" E, 447.00 feet and N 30°05'00" W, 134.54 feet, on the "Record of Survey Of A Portion of Hamilton Air Force Base Military Reservation" filed January 24th, 1983, in Book 18 of Surveys at page 21, Marin County Records; thence N 24°18'05" W 3,547.18 feet to a point on the Northeasterly line of the Parcel described in the Quitclaim deed to City of Novato as Exhibit "A", "North Hamilton Parcel", recorded December 29, 1999 under Document No. 1999-0090267, Marin County Records; thence following said Northeasterly line South 43°38'33" East 49.94 feet to a point, being the TRUE POINT OF BEGINNING;

thence leaving said Northeasterly line of said "North Hamilton Parcel" along a curve to the right whose center bears South 35°02'03" East, having a radius of 82.47 feet through a central angle of 69°58'39", an arc distance of 100.72 feet;

- thence South 36°39'17" East, 136.49 feet;
- thence South 41°43'38" East, 72.43 feet;
- thence South 44°50'54" East, 90.33 feet;
- thence South 08°14'55" West, 35.32 feet;
- thence South 42°25'42" East, 27.25 feet;
- thence North 69°24'23" East, 35.21 feet;
- thence South 43°50'10" East, 131.10 feet;
- thence South 44°21'20" East, 90.79 feet;
- thence South 47°24'03" East, 38.82 feet;
- thence South 63°53'29" East, 45.32 feet;
- thence South 58°18'59" East, 88.05 feet;
- thence South 43° 38' 33" East 659.80 feet;
- thence South 09° 24' 21" East 429.62 feet;
- thence South 29° 56' 04" East 1,665.14 feet;
- thence South 29° 56' 00" East 505.89 feet;
- thence South 29° 55' 44" East 433.70 feet;
- thence South 43° 42' 20" East 385.00 feet;

thence South 43° 39' 16" East 422.92 feet;

thence South 43° 40' 36" East 465.22 feet;

thence South 46 °17 '38" West 558.21 feet;

thence South 66° 16' 26" West 438.08 feet to a point on the Easterly line of the property transferred to the Department of the Navy from the Department of the Air Force by memorandums for the Secretary of the Navy, dated January 25, 1975, and May 5, 1976;

thence following said Easterly line, North 43° 40' 12" West 110.56 feet; to a point on the Southeasterly line of Parcel One of the Quitclaim deed to the New Hamilton Partnership, L.P., recorded August 26, 1996 under Document No. 1996-0045553, Marin County Records;

thence leaving said line of the property transferred to the Department of the Navy, and following the said Southeasterly line of Parcel One, North 82° 27' 41" East 49.96 feet;

thence leaving said Southeasterly line of Parcel One and following the Southeasterly line of Parcel A6 described in the Quitclaim deed to the New Hamilton Partnership, L.P., recorded August 26, 1996 under Document No. 1996-0045554, Marin County Records, North 66° 16' 26" East 411.96 feet;

thence leaving the line of said Parcel A6 and following the Southeasterly and Northeasterly lines of said Parcel One, North 46° 17' 38" East 452.40 feet;

thence North 43° 40' 36" West 375.28 feet;

thence leaving said Northeasterly line of Parcel One and following the Northeasterly line of Parcel A5 described in said Document No. 1996-0045554, North 43° 39' 16" West 422.90 feet;

thence leaving the line of said Parcel A5 and following the Northeasterly line of said Parcel One, North 43° 42' 20" West 395.83 feet;

thence leaving said Northeasterly line of Parcel One, North 29° 55' 55" West 444.45 feet to the Easterly corner of the parcel conveyed to the U.S. Coast Guard July 10, 1984;

thence following the Northeasterly line of said U.S.C.G. parcel, North 30° 05' 00" West 506.00 feet to a point on an Easterly line of Tract 1 of the Quitclaim deed to the New Hamilton Partnership, L.P., recorded June 26, 1995 under Document No. 1995-0029154, Marin County Records;

thence following the Easterly lines of said Tract 1, North 59° 55' 00" East 01.324 feet;

thence North 29° 56' 04" West 1,681.44 feet;

thence North 09° 24 ' 21" West 418.20 feet;

thence North 43° 38' 33" West 1,408.19 feet to a point on the Northeasterly line of said "North Hamilton Parcel";

thence leaving said Easterly lines of Tract 1 and following said Northeasterly line of "North Hamilton Parcel", North 43° 38' 33" West 40.06 feet to the POINT OF BEGINNING.

Containing 13.21 acres more or less.

ENCLOSURE 3 DESCRIPTION OF PROPERTY

TABLE E3-1
Identification of Property and Environmental Condition

Facility Identification and Description of Relevant Activities	Environmental Condition of Property Category	Environmental Condition of Property and Former, Ongoing, or Planned Remedial Actions
Levee Parcel	Category 2	Soil contamination – Soil contaminated with unknown purgeable hydrocarbons, benzene, toluene, ethylbenzene, and xylene was identified during pipeline removals and soil excavation. All contaminated soil above RCGs has been removed.

Environmental Condition of Property Categories:

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred. (including no migration of these substances from adjacent areas)

Category 2: Areas where only release or disposal of petroleum products has occurred.

Category 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.

Category 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.

Category 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.

Category 6: Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.

Category 7: Areas that are not evaluated or require additional evaluation.

ENCLOSURE 4

NOTICE OF PETROLEUM PRODUCT STORAGE, RELEASE OR DISPOSAL

TABLE E4-1

Notice of Petroleum Product Storage, Release, or Disposal

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Levee Parcel			
Outparcel A-5	Total petroleum hydrocarbons	Outparcel A-5 is located adjacent to the Levee Parcel north of Building 95. The Outparcel was primarily paved with asphalt and was used as an aircraft wash rack.	Outparcel A-5 is located adjacent to the Property north of Building 95 (see reference 10, figure 6-8). The Outparcel was primarily paved with asphalt and was used as an aircraft wash rack. Numerous investigations and remedial action were taken at this outparcel in conjunction with the GSA Phase I Program. Petroleum releases to soil at Outparcel A-5 extended into the Property as documented in the GSA Phase I Sale Area, Lot 7 and Outparcels A-5 and A-6 Closure Report (reference 10). The general location of petroleum releases associated with Outparcel A-5 are shown in Enclosure 1 and are specifically shown in reference 10. Closure of this area is documented in reference 18.
Outparcel A-6	Total petroleum hydrocarbons	Outparcel A-6 is located adjacent to the Levee parcel northwest of Building 86. This Outparcel was primarily paved and was used as an aircraft maintenance and storage area.	Outparcel A-6 is located adjacent to the Property northwest of Building 86 (see reference 10, figure 6-9). This outparcel was primarily paved and was used as an aircraft maintenance and storage area. Numerous investigations and remedial action were taken at this Outparcel in conjunction with the GSA Phase I Program. Petroleum releases to soil at Outparcel A-6 extended into the Property as documented in the GSA Phase I Sale Area, Lot 7 and Outparcels A-5 and A-6 Closure Report (reference 10). The general location of petroleum releases associated with Outparcel A-6 are shown in Enclosure 1 and are specifically shown in reference 10. Closure of this area is documented in reference 18.

TABLE E4-1

Notice of Petroleum Product Storage, Release, or Disposal

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Onshore Fuel Line (ONSFL)	Aviation Gas JP-4	From 1945 to 1975, the ONSFL was used to transport aviation gasoline and later JP-4 liquid fuels from the Offshore Fuel System to several locations around the airfield. The fuel lines were removed in 1995. The ONSFL intersected the Property in three locations. Two of the three fuel lines were located within storm drain lines that intersected the Property. The remaining fuel line that intersected the Property was referred to as Hangar Fuel Line B, and intersected the Property approximately 400 feet northeast of former Building 344. There were releases of petroleum products within the former location of the Hangar Fuel Line B intersection with the Property that have been remediated. Soil at the former location of Hangar Fuel Line B was impacted with fuel components (UHP and BTEX) at concentrations above the GSA Phase I RCGs. The remaining two locations (storm drain lines/fuel lines) did not have releases of petroleum product.	In 1996, after the fuel line was removed from the Hangar Fuel Line B within the Property, approximately 700 cubic yards of soil was removed, and confirmation samples showed concentrations of unknown purgeable hydrocarbons (UHP) and benzene, toluene, ethylbenzene, and xylene (BTEX) remaining in soil that were below the residential cleanup goals (RCGs).

ENCLOSURE 5
ENVIRONMENTAL PROTECTION PROVISIONS

The following conditions, restrictions, and notifications will be placed in the deed to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities at Hamilton Army Airfield (HAAF).

1. INCLUSION OF PROVISIONS

The Grantee to whom the property is transferred shall neither transfer the property; lease the property; nor grant any possessory interest, privilege, or license whatsoever in connection with the property without the inclusion of the environmental protection provisions contained herein, and shall require the inclusion of such environmental protection provisions in all further deeds, transfers, leases, or grant of any interest, privilege, or license.

2. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) ACCESS CLAUSE

The Government, the U.S. Environmental Protection Agency (USEPA), California Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB) and their officers, agents, employees, contractors, and subcontractors have the right, upon reasonable notice to the Grantee, to enter upon the Property in any case in which a response action or corrective action is found to be necessary, after the date of transfer of the property, or such access is necessary to carry out a response action or corrective action on adjoining property, including, without limitation, the following purposes:

- To conduct investigations and surveys, including, where necessary, drilling, soil and water sampling, test-pitting, test soil borings, and other activities
- To inspect field activities of the Government and its contractors and subcontractors
- To conduct any test or survey related to the environmental conditions at the Property or to verify any data submitted to USEPA, DTSC, or the RWQCB by the Government relating to such conditions
- To construct, operate, maintain, or undertake any other response or remedial actions as required or necessary including, but not limited to, monitoring wells, pumping wells, and treatment facilities

3. NO LIABILITY FOR NON-ARMY CONTAMINATION

The Army shall not incur liability for additional response action or corrective action found to be necessary after the date of transfer in any case in which the person or entity to whom the property is transferred, or other non-Army entities, is identified as the party responsible for contamination of the property.

4. NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP)

A. The Grantee/Transferee is hereby informed and does acknowledge that all former buildings on the Property, which were constructed or rehabilitated prior to 1978, are presumed to contain LBP. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built prior to 1978 is notified that such property may present exposure to lead from

LBP that may place young children at risk of developing lead poisoning. Lead poisoning in young children may produce permanent neurological damage, including learning disabilities, reduced intelligence quotient, behavioral problems, and impaired memory. Lead poisoning also poses a particular risk to pregnant women. The seller of any interest in residential real property is required to provide the buyer with any information on LBP hazards from risk assessments or inspections in the seller's possession and notify the buyer of any known LBP hazards.

"Residential Real Property" means dwelling units, common areas, building exterior surfaces, and any surrounding land, including outbuildings, fences and play equipment affixed to the land, available for use by residents but not including land used for agricultural, commercial, industrial, or other non-residential purposes, and not including paint on the pavement of parking lots, garages, or roadways and buildings visited regularly by the same child, 6 years of age or under, on at least two different days within any week, including day-care centers, preschools and kindergarten classrooms.

B . Available information concerning known LBP and/or LBP hazards, the location of LBP and/or LBP hazards contained in the Environmental Baseline Survey have been provided to the Grantee/Transferee. All purchasers must receive the federally approved pamphlet on lead poisoning prevention. The Grantee/Transferee hereby acknowledges receipt of all of the information described in this subparagraph.

C. The Grantee/Transferee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Real Property, as defined in paragraph A, above, without complying with this section and all applicable federal, state, and local laws and regulations pertaining to LBP and/or LBP hazards. Prior to permitting the occupancy of the Property where its use subsequent to sale is intended for residential habitation, the Grantee/Transferee specifically agrees to perform, at its sole expense, the Army's abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential LBP Hazard Reduction Act of 1992) (hereinafter Title X).

The Grantee/Transferee shall, after consideration of the guidelines and regulations established pursuant to Title X: (1) Perform a reevaluation of the Risk Assessment if more than 12 months have elapsed since the date of the last Risk Assessment; (2) Comply with the joint Housing and Urban Development and Environmental Protection Agency (EPA) Disclosure Rule (24 CFR 35, Subpart H, 40 CFR 745, Subpart F), when applicable, by disclosing to prospective purchasers the known presence of LBP and/or LBP hazards as determined by previous risk assessments; (3) Abate lead dust and LBP hazards in pre-1960 residential real property, as defined in paragraph A, above, in accordance with the procedures in 24 CFR 35; (4) Abate soil-lead hazards in pre-1978 residential real property, as defined in paragraph A, above, in accordance with the procedures in 24 CFR 35; (5) Abate lead-soil hazards following demolition and redevelopment of structures in areas that will be developed as residential real property; (6) Comply with the EPA LBP work standards when conducting LBP activities (40 CFR 745, Subpart L); (7) Perform the activities described in this paragraph within 12 months of the date of the LBP risk assessment and prior to occupancy or use of the residential real property; and (8) Send a copy of the clearance documentation to the Grantor.

In complying with these requirements, the Grantee/Transferee covenants and agrees to be responsible for any abatement or remediation of LBP or LBP hazards on the Property found to be necessary as a result of the subsequent use of the property for residential purposes. The Grantee/Transferee covenants and agrees to comply with solid or hazardous waste laws that may apply to any waste that may be generated during the course of LBP abatement activities.

D. The Grantee/Transferee further agrees to indemnify and hold harmless the Army, its officers, agents and employees, from and against all suits, claims, demands, or actions, liabilities, judgments, costs and attorney's fees arising out of, or in a manner predicated upon personal injury, death or property damage resulting from, related to, caused by or arising out of LBP or LBP hazards on the Property if used for residential purposes.

E. The covenants, restrictions, and requirements of this Section shall be binding upon the Grantee/Transferee, its successors and assigns and all future owners and shall be deemed to run with the land. The Grantee/Transferee on behalf of itself, its successors and assigns covenants that it will include and make legally binding, this Section, in all subsequent transfers, leases, or conveyance documents.”

5. MUNITIONS AND EXPLOSIVES OF CONCERN NOTIFICATION

Based upon a review of existing records and available information, neither the building and/or land proposed for transfer is known to contain MEC. **The term “MEC” means military munitions that may pose unique explosives safety risks, including: (A) unexploded ordnance (UXO), as defined in 10 U.S.C. 2710 (e) (9); (B) discarded military munitions (DMM), as defined in 10 U.S.C. 2710 (e) (2); or (C) explosive munitions constituents (e.g., TNT, RDX) present in high enough concentrations to pose an explosive hazard.** In the event that the Grantee/Transferee, its successors, and assigns, should discover any MEC on the Property, it shall not attempt to remove or destroy it, but shall immediately notify the local Police Department and competent Grantor, or Grantor designated MEC personnel will be dispatched promptly to dispose of such MEC at no expense to the Grantee.

**ENCLOSURE 6
REGULATORY/PUBLIC COMMENTS AND INSTALLATION POSITION ON UNRESOLVED
COMMENTS**

**Responses to Comments on the
Draft Final Finding of Suitability to Transfer
Former Hamilton Army Airfield Levee Parcel, December 2003**

No.	Comments	Responses
Davies Associates, James Davies, January 9, 2004		
General Comments:		
1.	The FOST refers to numerous parcels, buildings, former areas of contamination and other features that are not presented on the figure in Enclosure 1. Currently the FOST refers the reader to other reports containing these features. This makes the FOST user unfriendly because many of the referenced documents are not readily available. Therefore, it is recommended that the physical features mentioned in the FOST be added to the Enclosure 1 figure.	The figure in Enclosure 1 was revised to more clearly show the general location of key site features. Due to the linear nature of the Property the scale does not allow for detailed presentation of specific information. The specific details are better presented in other reports which are now more clearly referenced.
2.	There are several places in the FOST where documents are mentioned but not referenced and, in several cases, the documents are not listed in the Section 3 reference list. It is recommended that all documents mentioned be referenced and all source documents included in Section 3.	The change has been made as requested. All documents mentioned within the FOST are now referenced and all source documents are included in Section 3.
3.	Statements are made in the FOST that areas have been remediated but there is no mention that the remediation was approved by the regulatory agencies and there are no references to regulatory agency letters documenting their approval. Therefore, it is recommended that these letters be referenced in the text and added to the Section 3 list of documents reviewed for the FOST.	Regulatory concurrence letters for the actions taken on the Levee Parcel and adjacent properties have been referenced in the document and are now included in the list of documents reviewed for the FOST in Section 3.
Specific Comments:		
1.	Section 2. Please show the location of Building 93 on the Enclosure 1 figure.	Building 93 has been added to the Enclosure 1 figure.

No.	Comments	Responses
2.	Section 2. The first sentence refers to Table 1 but it is not present in the FOST. This reference may be to Table E3-1 in Enclosure 3; please make the necessary changes.	The Draft Final FOST contains Table 1 which is located directly below the paragraph that contains the sentence referring to the table. No correction/addition is necessary.
3.	Section 2. The fifth sentence states the City constructed the levee. In fact, the levee was constructed by the New Hamilton Partnership and subsequently turned over to the City who now owns and maintains it; please modify the sentence accordingly	The fifth and sixth sentences of Section 2 were revised as follows to correct the reference made to the City: "The New Hamilton Partnership was granted an easement for the Levee Parcel and in September 1996 constructed a levee on the parcel. The levee was then turned over to the City who now own and maintain the levee. The City will accept fee title to the land under the levee following the FOST process."
4.	Section 2. The last sentence states that a legal description of the Property is provided in Enclosure 2 but there is no accompanying property boundary survey map in the enclosure. Please add the property boundary survey map to Enclosure 2 and add a reference to it in Section 2.	A legal description is all that is required for purposes of meeting the requirements for this transfer document. The figure in Enclosure 1 is a base map for Hamilton Army Airfield and has been developed based upon surveyed locations.
5.	Section 3. This section presents a list of the documents the Army used to make the determination on the property's environmental condition but it does not include all of the documents mentioned in the FOST and does not include any of the regulatory agency letters documenting approving the various documents and remediations that took place on and adjacent to the Levee Parcel (see General Comments 2 and 3). Please add all of these letters to this section.	All documents mentioned within the FOST are now referenced in Section 3. Regulatory concurrence letters for the actions taken on the Levee Parcel and adjacent properties have been referenced in the document and are now included in the list of documents reviewed for the FOST in Section 3.
6.	Section 3. The second listed reference is to the July 1993 Engineering Science Baseline Human Health Risk Assessment but this was not the basis for the GSA Phase I residential cleanup goals (RCG) referred to in Section 4. Unless the Engineering Science risk assessment was utilized on the Levee Parcel, the reference should be removed from this section. Furthermore, the RCGs were based on Woodward Clyde Consultants' 1995 risk assessment, which is not included in the Section 3 references. Please rectify these discrepancies. Also, the reference list would be much easier for the reader to use each references was separated by a line space as presented in previous FOSTs rather than in the current run-on style.	The RCG's were developed in a February 24, 1995 letter prepared by Woodward Clyde, based on the draft Woodward-Clyde 1995 Risk Assessment. The draft Risk Assessment derived preliminary remediation goals (PRGs) for the site. This letter has been included as a reference in section 3. The format for the list of references was revised and separated.

No.	Comments	Responses
7.	Section 3. The last sentence states the information provided is a result of a complete search of agency files. Does "agency" refer to one or more of the regulatory agencies or some other agency? Please clarify the agency being referred to.	The search of agency files involves a records search which includes a review of federal, state, and local records to identify the environmental condition of the property.
8.	Section 3.1. Enclosure 3 is titled "Description of Property" which is different than the title described in the second sentence of this section; please rectify this discrepancy. Also, it is recommended that a reference to Table E3-1 be added to this section.	The title of Enclosure 3 was changed in Section 3.1 and now reads "Description of Property". A reference to Table E3-1 was added following the callout for Enclosure 3 in this section.
9.	Section 3.3. Please show the three locations mentioned in the third sentence where the Onshore Fuel Line (ONSFL) intersects the Levee Parcel on the figure in Enclosure 1 and differentiate between the two locations that were within the storm drain lines and the Hanger Fuel Line B location. Once this change has been made, the fourth sentence that includes "reference 8" can be removed. Also, please add Building 344 to the Enclosure 1 figure.	The general location of all three pipelines has been added to the figure and reference to the Comprehensive Remedial Investigation Report was removed from the section. The figure in Enclosure 1 was revised to more clearly show the general location of key site features. Due to the linear nature of the Property the scale does not allow for detailed presentation of specific information. The specific details are better presented in other reports, which are now more clearly referenced.
10.	Section 3.3. Please add Outparcels A-5 to the Enclosure 1 figure and show the locations and area where the soil excavation extended partially into the Levee Parcel. Then the second sentence can be modified to read "The excavation location is shown on the Enclosure 1 figure and the excavation boundaries are presented on the figures in reference 8, 10 and 11" or a similar statement.	The general location of Outparcel A-5 is shown in the figure in Enclosure 1. Details regarding the specific location of petroleum releases and remediation can be found in the references noted in the text and on the figure in Enclosure 1.
11.	Section 3.3. The third sentence under Outparcel A-5 refers to the "Tarmac East of Outparcel A-5" but it is unclear what this means and it is not in the Section 3 reference list. Please clarify what this item is, its relevance to the Levee Parcel, add its source document to the Section 3 reference list and add a reference to the source document in the text.	The text has been revised to remove the reference to "the Tarmac East of Outparcel A-5" No further references are necessary.

No.	Comments	Responses
12.	<p>Section 3.3. The Outparcel A-5 discussion also refers to the Focused Feasibility Study and the Risk Assessment for the Main Airfield Parcel and states that they determined no remedial action was required. This is confusing because it appears to be in conflict with the first two sentences which state that soil excavation was performed within the Levee Parcel. In order to rectify this conflict, it appears that statements need to be added explaining that the soil excavation was completed, citing the report that documents the cleanup (with the reference to that report), and stating that the remediation was approved by the regulatory agencies (with a reference to the agency approval letters). It also appears that statements need to be added clarifying that the subsequent Focused Feasibility Study and Risk Assessment reviewed the previous remediation and concurred that no additional actions are necessary. Please review the Outparcel A-5 discussion, make the necessary clarifying changes and add references to the source reports. Furthermore, please add the Focused Feasibility Study, Risk Assessment, Outparcel A-5 remediation completion report or similar report, any other source documents and regulatory approval letters to the Section 3 reference list.</p>	<p>The discussion of remedial activities in Section 3.3 has been moved to Section 4 to help clarify this information. Statements have been added to clarify that soil excavation was completed and document closure of the site.</p>
13.	<p>Section 3.3. Please add Outparcels A-6 to the Enclosure 1 figure and show the locations and area where the soil excavation extended partially into the Levee Parcel. Then the second sentence can be modified to read "The excavation location is shown on the Enclosure 1 figure and the excavation boundaries are presented on the figures in reference 8, 10 and 11" or similar statement.</p>	<p>The general location of Outparcel A-6 is shown in the figure in Enclosure 1. Details regarding the specific location of petroleum releases and remediation can be found in the references noted in the text and on the figure in Enclosure 1.</p>
14.	<p>Section 3.3. The third sentence under Outparcel A-6 refers to the "Aircraft Maintenance and Storage Facility site" but it is unclear what this means and it is not in the Section 3 reference list. Please clarify what this item is, its relevance to the Levee Parcel, add its source document to the Section 3 reference list and add a reference to the source document in the text.</p>	<p>The text has been revised to remove the reference to the "Aircraft Maintenance and Storage Facility site". No further references are necessary.</p>

No.	Comments	Responses
15.	<p>Section 3.3. The Outparcel A-6 discussion also refers to the ROD/RAP (these acronyms should be spelled out) for the Main Airfield Parcel and states that "no remedial action is required within the portion that includes the Property" (i.e. the Levee Parcel). This is confusing because it is in conflict with the first two sentences which state that soil excavation was performed within the Levee Parcel. In order to rectify this conflict, it appears that statements need to be added explaining that the soil excavation was completed, citing which report documents the cleanup (with a reference to that report), and stating that the remediation was approved by the regulatory agencies (with a reference to the agency approval letters). It also appears that statements need to be added clarifying that the subsequent RAP/ROD reviewed the previous remediation and concurred that no additional actions are necessary. Please review the Outparcel A-6 discussion, make the necessary clarifying changes and add references to the source reports. Furthermore, please add the RAP/ROD, Outparcel A-6 remediation completion report or similar report, and other source documents and regulatory approval letters to the Section 3 reference list.</p>	<p>The discussion of remedial activities in Section 3.3 has been moved to Section 4 to help clarify this information. Statements have been added to clarify that soil excavation was completed and to document the closure of the site.</p>
16.	<p>Section 3.3. The last paragraph states that a summary of the "petroleum product activities" is provided in Enclosure 4. These or similar words should be added to the title of Enclosure 4 and it is recommended that a reference to Table E4-1 be added to this section.</p>	<p>The title, "Notice of Petroleum Product Storage, Release, or Disposal", was added to Enclosure 4.</p> <p>A reference to Table E4-1 was added following the callout for Enclosure 4 in this section.</p>
17.	<p>Section 3.5. It is recommended that a sentence be added at the end of the section similar to the statement at the end of Section 3.4 stating that there is no need for notifications of ACM.</p>	<p>The following sentence was added at the end of Section 3.5:</p> <p>"Accordingly, there is no need for notification of ACM."</p>
18.	<p>Section 3.8. The Navy radon report mentioned in the second sentence should be referenced and the source document included in the Section 3 reference list.</p>	<p>All documents mentioned within the FOST are now referenced and all source documents are included in Section 3.</p>

No.	Comments	Responses
19.	<p>Section 3.11. The first paragraph lists properties with existing or previous hazardous conditions but is incomplete. Other adjacent contaminated properties that have been remediated include Lot 7 (soil and groundwater remediation), underground storage tanks east of the hangers (soil remediation), Hanger Avenue and JP4 fuel lines (soil and groundwater remediation) and removal and off site disposal of PCB transformers in three of the hangers. These contaminated properties should be added to Section 3.1.</p> <p>Furthermore, for all properties listed in this section, statements should be added that they have been remediated with references to the reports documenting the remediation and to the associated regulatory agency approval letters. The reports and approval letters should be added to the Section 3 reference list, if not already included.</p>	<p>The Main Airfield Parcel, POL Hill, GSA Phase I Sale Area, and Outparcels A-4, A-5, and A-6 have been included as adjacent properties. Lot 7, the underground storage tanks east of the hangers, Hanger Avenue and JP4 fuel lines, and the removal and offsite disposal of PCB transformers are all a part of the GSA Phase I Sale Area.</p>
20.	<p>Section 4. This section addresses remediation but only discusses the Hanger Fuel Line B cleanup. Please add a similar discussion for the aforementioned soil excavation remediations in Outparcels A--5 and A-6 which, to be consistent with the Hanger Fuel Line B discussion, should include the chemicals of concern, the soil volume removed and any residual chemicals remaining in the soil along with a statement that the residual concentrations are below the Phase I GSA RCGs. Also, please include references to the reports documenting the remediation and the regulatory agency approval letters and, if not already included, add them to the Section 3 reference list.</p>	<p>A similar discussion for the soil excavation remediations was included in section 4 for Outparcels A-5 and A-6, and is now consistent with the Hanger Fuel Line B discussion. Appropriate references have been incorporated within the text.</p>
21.	<p>Section 4. The first paragraph is confusing because it states that soil sample results along the ONSFL "indicated that most of the contamination was within 20 feet of the former fuel line trench" which conflicts with previous and subsequent statements that the only contamination was where Fuel Line B crossed the Levee Parcel. Please clarify this discrepancy.</p>	<p>When contamination was present along the ONSFL, it was within 20 feet of the pipeline. However, there was not contamination along the entire route of the ONSFL. In the case of the three intersection points of the ONSFL through the levee parcel, only one section (Fuel Line B) had contamination that required excavation and confirmation sampling.</p>
22.	<p>Section 4. The second paragraph mentions the GSA Phase I RCGs. Please add a reference to the Woodward Clyde Consultants' 1995 report that contains these goals and add it to the Section 3 reference list.</p>	<p>The RCG's were developed in a February 24, 1995 letter prepared by Woodward Clyde, based on the draft Woodward-Clyde 1995 Risk Assessment. The draft Risk Assessment derived preliminary remediation goals (PRGs) for the site. This letter has been included as a reference in section 3.</p>

No.	Comments	Responses
23.	Section 4. In the second paragraph, please add a reference to the report documenting the Hanger Fuel Line B remediation, add the regulatory agency approval letters (with references) and, if not already included, please add the source documents and letters to the Section 3 reference list.	A reference to the report documenting the former Hanger Fuel Line B remediation was added to Section 4 and is now referenced in Section 3. Regulatory concurrence letters for the actions taken at former Hanger Fuel Line B have been referenced in this section and are now included in the list of documents reviewed for the FOST in Section 3.
24.	Section 4. In the last paragraph, please add a reference to the regulatory agency approval letters and, if not already included, add them to the Section 3 reference list.	Regulatory concurrence letters for the actions taken at the former Hanger Fuel Line B have been referenced in the document and are now included in the list of documents reviewed for the FOST in Section 3.
25.	Enclosure 1. The Figure 1 name on page E1-1 does not match the title of the figure. Also, please add a number to the Enclosure 1 figure and use it in the text of the FOST.	<p>The figure title called out on page 7 in the list of enclosures and the figure title called out on page E1-1, has been changed to the title of the figure in Enclosure 1, <i>Location Map for the Levee Parcel</i>.</p> <p>As Enclosure 1 only includes the location map, an additional reference to the figure in the text of the FOST will not be necessary.</p>
26.	Enclosure 1 Figure. Please add the features in the above specific comments to the figure.	The figure in Enclosure 1 was revised to more clearly show the general location of key site features. Due to the linear nature of the Property the scale does not allow for detailed presentation of specific information. The specific details are better presented in other reports which are now more clearly referenced.
27.	Enclosure 2. Please add a property boundary survey map to this enclosure and a reference to it in Section 2.	A legal description is all that is required for purposes of meeting the requirements for this transfer document. The figure in Enclosure 1 is a base map for Hamilton Army Airfield and has been developed based upon surveyed locations.
28.	Enclosure 4, Table E4-1. In the Outparcel A-5 row, the Remedial Actions column's second paragraph contains the same verbiage as Section 3.3. Please see Specific Comments 11 and 12 and make the same changes to this paragraph. Also, please add the information requested in Specific Comment 20 to be consistent with the discussion on the ONSFL in this table.	Please see responses to Specific Comments 11 and 12. These changes have been made to the table as well.

No.	Comments	Responses
29.	Enclosure 4, Table E4-1. In the Outparcel A-6 row, the Remedial Actions column's second paragraph contains the same verbiage as Section 3.3. Please see Specific Comments 14 and 15 and make the same changes to this paragraph. Also, please add the information requested in Specific Comment 20 to be consistent with the discussion on the ONSFL in this table.	Please see responses to Specific Comments 14 and 15. These changes have been made to the table as well.

**Responses to Public Comments on the
Draft Final, Finding of Suitability to Transfer
Former Hamilton Army Airfield Levee Parcel, December 2003**

No.	Comments	Responses
Written Comments and Responses from Elena Belsky, Environmental Investigator source: Letter regarding Final Draft of Finding of Suitability of Transfer (FOST) Levee Parcel, dated 9 January 2004.		
General Comments:		
1.	Thank you for the opportunity to comment on the Levee Parcel FOST. At this time, my main comment is that I believe a FOSET would be the correct process to use for this parcel, as the levee contains contaminated soils.	A FOST is the appropriate transfer support document for this parcel since the City currently owns the levee, and as the FOST states, only the property under the levee is being transferred. The property under the levee does not contain contaminated soils that require any actions.
2.	As listed in the March 1999 Runway Spoils Pile Disposition Report, the New Hamilton Partnership Levee was built with soil from runway spoils piles containing known contaminants. This information was interestingly left out of the FOST; it should have been included in the transfer documents.	The levee itself is not a part of this transfer. For inquiries regarding the levee, please contact the City of Novato.
3.	Recent State Coastal Conservancy test data (2003 EK report) from the runway spoils piles also indicate high levels of DDT's - which was not previously tested for - thus adding the potential for even more contaminants on the Levee Parcel. This should be investigated prior to the transfer of property, and a FOSET should be used to finally transfer the property after the completed investigation.	The levee itself is not a part of this transfer. For inquiries regarding the levee, please contact the City of Novato.
4.	The City of Novato and the homeowners of Hamilton deserve full disclosure of all contaminated areas, especially when it is already well documented.	The Army has fully disclosed all information regarding the cleanup efforts at Hamilton. All documentation of the Army BRAC remedial efforts at Hamilton Army Airfield can be found at the Hamilton BRAC Environmental Office: 1 Burma Road Novato, CA 94949 Many documents are also available at the Main Branch of the Novato Public Library: 1720 Novato Blvd. Novato, CA 94947 415-898-4623