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REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333-0001

AMCEN-R

15 JUL 1998

MEMORANDUM THRU Commander, U.S. Army Engineer Division, South Atlantic, ATTN: CESAD-RE, 77 Forsyth Street, Room 313, 77 Forsyth Street, S.W., Atlanta, GA 30335-6801

FOR Commander, U.S. Army Corps of Engineer District, Mobile, ATTN: CESAM-RE-M, P.O. Box 2288, Mobile, AL 36628-0001

SUBJECT: Finding of Suitability to Lease (FOSL-4) for Defense Distribution Depot, Memphis (DDMT)

1. References:

a. Memorandum, AMCEN-R, 3 Apr 97, subject: Report of Availability for a Master Lease with the Memphis Depot Redevelopment Agency.

b. Memorandum, DLSC-BBB, 12 Jun 98, SAB (Encl 1).

2. Enclosed for your action is the approved FOSL-4 (Encl 2) with supporting documentation for adding Buildings 253, 254, 256, 257, 260, 261, 263, 265, 273, pad 267 and various parcels at DDMT to the master lease with Memphis Depot Redevelopment Agency.

3. The approved Report of Availability for the entire installation, including the property addressed in this FOSL, was forwarded with reference a.

4. The Final Environmental Assessment for Master Lease, Defense Distribution Depot Memphis, Tennessee, dated Sep 96, is the National Environmental Policy Act Document for this action.

5. Request a modification to the master lease adding Buildings 251 and 972 be executed in accordance with the Report of Availability and FOSL-3.

AMCEN-R

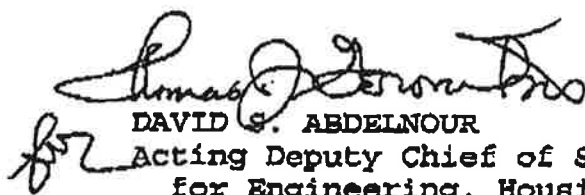
SUBJECT: Finding of Suitability to Lease (FOSL-4) for Defense Distribution Depot, Memphis (DDMT)

6. Point of contact for this action is Mr. Joe Goetz, AMCEN-R, commercial (703) 617-8904 or DSN 767-8904.

7. AMC -- America's Arsenal for the Brave.

FOR THE COMMANDER:

2 Encls


DAVID S. ABDELNOUR
for Acting Deputy Chief of Staff
for Engineering, Housing,
Environment, and Installation
Logistics

CF: (wo/encls)

Assistant Chief of Staff for Installation Management, ATTN:

DAIM-BO, 600 Army Pentagon, Washington, D.C. 20310-0600

Headquarters, U.S. Army Corps of Engineers, ATTN: CERE-C,

Pulaski Bldg #4133, 20 Massachusetts Avenue, Washington, D.C.
20314-1000

Director, Defense Logistics Agency, ATTN: DLSC-BBB, 8725 John J.
Kingman Road, Suite 2533, Fort Belvoir, VA 22060-6221

Commander, Defense Distribution Depot Memphis, ATTN: DDMT-D,
2163 Airways Boulevard, Memphis, TN 38114-5210

FINDING OF SUITABILITY TO LEASE

(FOSL)

*Parcel 4.4, Parcel 4.5, Parcel 4.6, Parcel 4.7,
Parcel 4.8, Parcel 4.9, Parcel 4.10, Parcel 4.11, Parcel 4.13*

Defense Distribution Depot Memphis, Tennessee

(FOSL number 4)

July 8, 1998

1. PURPOSE

The purpose of this Finding Of Suitability To Lease (FOSL) is to document the environmental suitability of Parcels 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 4.10, 4.1 and 4.13 at the Defense Distribution Depot Memphis, Tennessee (DDMT) for leasing to the Depot Redevelopment Corporation (DRC) for light industry, storage or general office use consistent with Department of Defense (DOD) and Army policy. This FOSL has been developed in accordance with the DRC's Reuse Plan. In addition, the FOSL identifies use restrictions as specified in the attached Environmental Protection Provisions (Enclosure 5) necessary to protect human health or the environment and to prevent interference with any existing or planned environmental restoration activities.

2. PROPERTY DESCRIPTION

The proposed property to be leased consists of 5.93 acres that includes nine (9) parcels (4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 4.10, 4.11 and 4.13). Included in these parcels are nine (9) buildings (Buildings 253, 254, T256, 257, 260, T261, 263, 265 and 273), one pad (Pad 267) and one open area. The open land area contains Buildings T256 and T261. Site maps of the property proposed to be leased can be found at Enclosure 1.

3. ENVIRONMENTAL CONDITION OF THE PROPERTY

A determination of the environmental condition of the facilities has been made based on the Community Environmental Response Facilitation Act (CERFA) Letter Report dated December 5, 1996 and an Environmental Baseline Survey (EBS) dated November 6, 1996. The information provided is a result of a complete search of agency files during the development of these environmental surveys. The following documents also provided information on environmental conditions of the property: Draft Final BRAC Cleanup Plan Version 2 (DDSP-FE, November 1997), Asbestos Reinspection (DDC-WP, October 1996), Final Environmental Assessment for Master Interim Lease (Tetra Tech, September 1996), Remedial Investigation Soil Sampling Letter Report (CH2M Hill, May 1997), OU - 2 and OU - 3 Field Sampling Plans (CH2M Hill, September 1995), Asbestos Identification Survey (Pickering, December 1993 and January 1994), RCRA Facilities Assessment (A.T. Kearney, Inc., January 1990), : Final Remedial Investigation Report (Law Environmental, August 1990) and the Installation Assessment (USAEHA, March 1981).

3.1 Environmental Condition of Property Categories

The Department of Defense (DOD) Environmental Condition of Property (ECP) Categories for the properties are as follows:

ECP Category 1: Parcel 4.11 - Building 253 only

- ECP Category 3: Parcel 4.8 - Building 263 only
 Parcel 4.4 - Building 260 only
- ECP Category 4: Parcel 4.13 - Building 265 only
- ECP Category 6: Parcel 4.6 - Building 254 and surrounding area
 Parcel 4.7 - Building 257 and surrounding area
- ECP Category 7: Parcel 4.10 - Building 273 and surrounding area
 Parcel 4.9 - Pad 267 and surrounding area
 Parcel 4.5 - consisting of Buildings T256 and T261 plus all
 land areas in Parcel 4 except those within Parcels 4.6, 4.7,
 4.9 and 4.10

A summary of the ECP Categories for specific buildings or parcels is provided in Table 1 – Description of Property (Enclosure 2).

3.2 Storage, Release or Disposal of Hazardous Substances

Hazardous substances were stored in Buildings 253, 254, 257, 260, 263, 265, 273, Pad 267 and the open areas of Parcel 4.5. It is assumed this storage was in excess of the 40 CFR Part 373 reportable quantities. Hazardous substances were released in Buildings 254, 257, 260, 273, Pad 267 and other areas in Parcel 4.5 surrounding Buildings 253, 263 and T256. It is assumed, unless otherwise noted, releases were in excess of the 40 CFR Part 373 reportable quantities. The release of hazardous substances was either remediated at the time of the release or is currently under evaluation as part of the installation restoration program. There is no risk to human health and the environment so long as the tenant adheres to the Environmental Protection Provisions (Enclosure 5) with particular reference to Provision 14 regarding ground disturbing activities. These activities shall not be allowed without prior written approval from the Government. A summary of the buildings or areas in which hazardous substances activities occurred is provided in Table 2 – Notification of Hazardous Substance Storage, Release or Disposal (Enclosure 3).

3.3 Petroleum and Petroleum Products

3.3.1 Storage, Release or Disposal of Petroleum Products

Petroleum products were stored in Buildings 253, 254, T256, 257 and the open grassy area in Parcel 4.5 directly south of Building 257. It is assumed this storage was in excess of 55 gallons. Petroleum products were released in Building 257 and the surrounding area as well as the open grassy area in Parcel 4.5 directly south of Building 257. It is assumed, unless otherwise noted, these releases were in excess of 55 gallons. The release of petroleum products was either remediated at the time of the release or is currently under evaluation as part of the installation restoration program. There is no risk to human health and the environment so long as the tenant adheres to the Environmental

to human health and the environment so long as the tenant adheres to the Environmental Protection Provisions (Enclosure 5) with particular reference to Provision 14 regarding ground disturbing activities. These activities shall not be allowed without prior written approval from the Government. An underground storage tank removal project for Parcel 4.5 is scheduled for the summer of 1998 and will include all associated piping and any petroleum contaminated soil. A summary of the buildings or areas in which petroleum products were stored or released is provided in Table 3 – Notification of Petroleum Product Storage, Release or Disposal (Enclosure 4).

3.3.2 Underground and Above-Ground Storage Tanks (UST/AST)

There are two (2) underground storage tanks and two (2) aboveground storage tanks (UST/AST) on the property that were used for storage of petroleum products. There is no evidence of petroleum product releases at the following UST/AST sites: the 18,000-gallon UST gasoline tank (converted to diesel in 1995) and the 20,000-gallon UST gasoline tank installed in 1984 south of Building 257, the two (2) 1,000-gallon AST gasoline tanks (one was converted to diesel in 1995) located adjacent to Building 257. A summary of the buildings or areas in which petroleum product activities occurred is provided in Table 3 – Notification of Petroleum Products Storage, Release or Disposal (Enclosure 4).

3.4 Polychlorinated Biphenyls (PCB) Equipment

There are no PCB containing transformers or other PCB containing equipment, except hermetically sealed fluorescent light bulb ballasts that may contain PCBs, located on the property listed in this FOSL. There is no evidence of unremediated PCB releases from these ballasts.

3.5 Asbestos

The EBS and the Asbestos Identification Survey (Pickering, December 1993 and January 1994) indicate Asbestos Containing Materials (ACM) are present in the following buildings:

Building 260: Thermal System Pipe Insulation (to include joints)
Cement Ceiling Panels
Exterior Window Putty
12 x 12 Floor Tiles and Mastic

Building 254: Cement Asbestos Panels
Felt Paper Roofing Material

Building 257: 12 x 12 Vinyl Floor Tiles
Asphalt Built Up Roofing and Roof Flashing

Building 253: Exterior Window Frame Putty
12 x 12 Vinyl Floor Tile
Thermal System Pipe Insulation

Building 265: Boiler Flue Insulation
Thermal System Pipe Insulation (to include joints)
Interior Boiler Door Insulation
9 x 9 Floor Tile
12 x 12 Floor Tile
Roof Flashing

Building 273: No Survey Completed - Structure is a tin and wood shed;
assumed no ACM present

Building T256: No Survey Completed - Structure is a tin and wood shed;
assumed no ACM present

Building T261: No Survey Completed - Structure erected in 1993;
assumed no ACM present

The ACM does not currently pose a threat to human health or the environment because all friable asbestos that posed an unacceptable risk to human health has been removed or encapsulated. The lease will include the asbestos warning and covenant included in the Environmental Protection Provisions (Enclosure 5).

3.6 Lead-Based Paint (LBP)

Based on the age of the buildings (constructed prior to 1978), the following buildings are presumed to contain lead-based paint: Buildings 260, 254, 257, 253, 265, 273, T256, and 263. The lease will include the lead-based paint warning and covenant provided in the Environmental Protection Provisions (Enclosure 5).

3.7 Radiological Materials

There is no evidence that the Department of Defense used or stored radioactive materials on the property.

3.8 Radon

In keeping with DOD policy to not perform radon assessment and mitigation prior to transfer of BRAC property, there were no radon surveys conducted in the buildings in this FOSL.

3.9 Unexploded Ordnance

Based on a review of existing records and available information, none of the buildings or surrounding land proposed for lease are known to contain unexploded ordnance.

3.10 Other Hazardous Conditions

There are no other known hazardous conditions that present an unacceptable threat to human health or the environment on the property.

4. REMEDIATION

In October 1992, the U.S. Environmental Protection Agency (EPA) placed DDMT on the National Priorities List (NPL) for environmental restoration. DDMT has since entered into a Federal Facilities Agreement (FFA) with the Tennessee Department of Environment and Conservation (TDEC) and the EPA. Environmental contamination on the property described in this document does not present a hazard to leasing it. In addition, environmental conditions on adjacent property do not present a hazard to the leasing of the property. Table 2 - Notification of Hazardous Substance Storage, Release or Disposal (Enclosure 3) and Table 3 - Notification of Petroleum Product Storage, Release or Disposal (Enclosure 4) provide details regarding environmental conditions for each individual parcel or building contained within this FOSL. Regulators have concurred with DDMT that Buildings 253, 260, 263 and 265 do not pose risks above levels deemed protective provided that the property is used for the proposed purpose and the lessee strictly adheres to the Environmental Protection Provisions (Enclosure 5). Buildings 254 and 257 and the surrounding areas shall be remediated during the Parcel 4.5 underground storage tank removal project scheduled for the summer of 1998 and will not pose risks above levels deemed protective provided the property is used for the proposed purpose. The remaining property consisting of Building 273 and surrounding area, Building T261, Building T256, Pad 267 and surrounding area as well as the remaining open areas do not pose risks above levels deemed protective provided that the property is use for the proposed purpose and the lessee strictly adheres to the Environmental Protection Provisions (Enclosure 5). The lease will include a provision reserving the Army's right to conduct remediation activities in the Environmental Protection Provisions (Enclosure 5).

5. REGULATORY/PUBLIC COORDINATION

The U.S. EPA Region 4, TDEC and the public were notified of the initiation of the FOSL. Regulators have reviewed this FOSL and provided comments. These comments have been reviewed and incorporated as appropriate. Regulatory/public comments and responses are provided in Enclosure 6.

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

The environmental impacts associated with proposed lease 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 Final Environmental Assessment for Master Interim Lease, Defense Distribution Depot Memphis, Tennessee, dated September 1996. The environmental effects of the activities anticipated under the proposed lease were determined not to be significant. In addition, the proposed use of the property is consistent with the intended reuse of the property set forth in the Depot Redevelopment Corporation Reuse Plan.

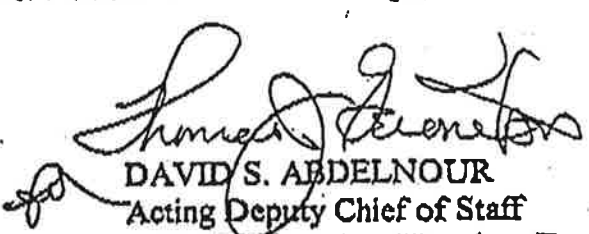
7. ENVIRONMENTAL PROTECTION PROVISIONS

On the basis of the above results from the site-specific EBS and other environmental studies and in consideration of the intended use of the property, certain terms and conditions are required for the proposed lease. These terms and conditions are set forth in the attached Environmental Protection Provisions (Enclosure 5) and will be included in the lease.

8. FINDING OF SUITABILITY TO LEASE

Based on the above information, I have concluded that all Department of Defense (DOD) requirements to reach a Finding of Suitability to Lease (FOSL) to the Depot Redevelopment Corporation for light industrial use have been fully met for the property subject to the terms and conditions in the attached Environmental Protection Provision (Enclosure 5). As required by CERCLA section 120(h)(3)(B), I have determined that the property is suitable for lease for the intended purpose, the uses contemplated for the lease are consistent with protection of human health and the environment, and there are adequate assurances that the United States will take any additional remedial action found to be necessary that has not been taken on the date of the lease.

As required under the DOD FOSL Guidance, notification of hazardous substance activities and petroleum product activities shall be provided in the lease documents. Refer to Table 2 - Notification of Hazardous Substance Storage, Release or Disposal (Enclosure 3) and Table 3 - Notification of Petroleum Product Storage, Release or Disposal (Enclosure 4).


DAVID S. ABDELNOUR

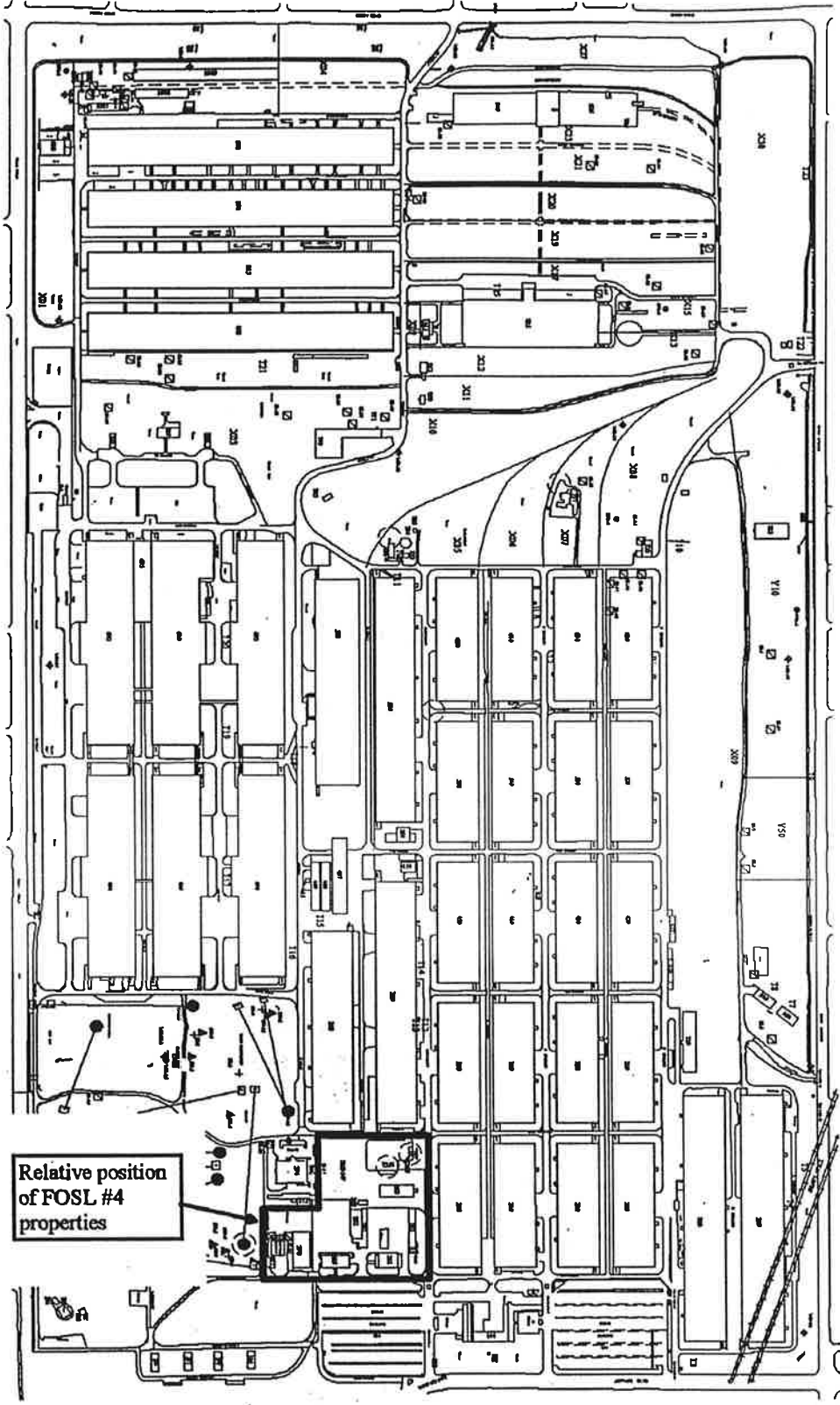
Acting Deputy Chief of Staff

For Engineering, Housing, Environment, and
Installation Logistics

7 Enclosures

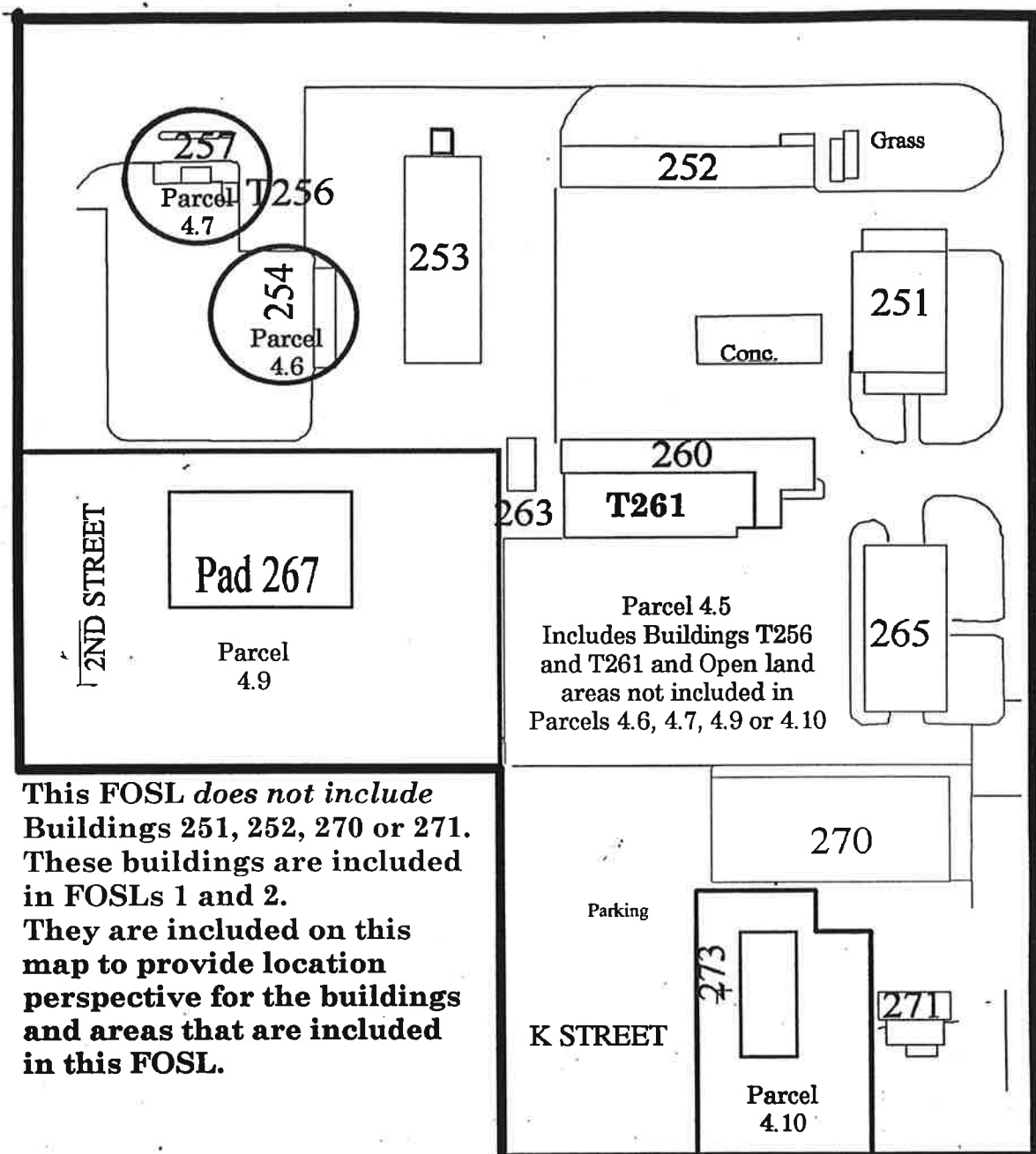
- Encl 1 Site Maps of Property**
- Encl 2 Table 1 - Description of Property**
- Encl 3 Table 2 - Notification of Hazardous Substances Storage, Release or Disposal**
- Encl 4 Table 3 - Notification of Petroleum Products Storage, Release or Disposal**
- Encl 5 Environmental Protection Provisions**
- Encl 6 Regulatory/Public Comments and Responses**
- Encl 7 Reference Materials**

Enclosure 1
Site Map of Property in FOSL 4



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Enclosure 1
Site Map of Property in FOSL 4



This FOSL does not include Buildings 251, 252, 270 or 271. These buildings are included in FOSLs 1 and 2. They are included on this map to provide location perspective for the buildings and areas that are included in this FOSL.

Enclosure 2
Table 1 – Description of Property

Building Number and Property Description	EBS Parcel Designation	Condition Category	Remedial Actions
Building 260 is a 6,707 square foot building erected in 1952 that was used as a maintenance shop.	4.4(3)PS/PR/HS/IR	3	This building was a satellite drum accumulation area and housed a Safety Kleen unit. While the RCRA Facility Assessment (RFA) visual inspection noted staining on the floor in the sign shop of this building, the RFA recommended no further action. The BCT concurred in September 1997. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Parcel 4.5 - Open Area of Parcel 4. Includes Buildings T256 and T261 as well as all land areas in Parcel 4.5 except land areas included in Parcels 4.6, 4.7, 4.9 and 4.10.	4.5(7)	7	The general area of concern for Parcel 4.5 is the UST field adjacent to Buildings 254, T256 and 257. Screening Sites (SS) 66, 67 and 68 are located within Parcel 4.5, but may be associated to activities in nearby buildings. SS66 is addressed in Table 2, Parcel 4.5. SS67 is addressed in Table 3, Building 257. SS68 is addressed in Table 3, Building 263. The two USTs, all associated piping leading up to the pump house (Building 257) and any petroleum contaminated soils will be removed during the Parcel 4.5 underground storage tank removal project scheduled for the summer of 1998. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building T256 is a 192 square foot building erected in 1943 that was used as a storage shed.	4.5(7)	7	Building T256 is a storage shed located adjacent to Building 257, and there are no records of any spills in this building. Because this building is included in Parcel 4.5, it is listed as ECP category 7. There are no remedial actions anticipated for this area. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

Enclosure 2
Table 1 – Description of Property

Building Number and Property Description	EBS Parcel Designation	Condition Category	Remedial Actions
Building T261 is a 6,249 square foot building erected in 1993 (original 1942 building demolished) that was used for vehicle storage and maintenance.	4.5(7)	7	Building T261 is a covered parking area constructed in 1994 that was used for the storage of large tractors and equipment for grounds keeping and other functions. Because this building is included in Parcel 4.5, it is listed as ECP category 7. There are no remedial actions anticipated for this area. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 254 is a 1,004 square foot building erected in 1944 that was used for equipment storage as well as oil and antifreeze storage. This parcel also includes a portion of the underground storage tank field.	4.6(6)	6	Leaking drums and ground staining were observed during a visual inspection for the EBS. The visual inspection also noted petroleum, oil and lubricants (POLs) and antifreeze storage. This building is in ECP category 6 based on the USTs and associated piping located west of Building 254. An 1,110-gallon gasoline UST was removed from this area in 1989. Removal of any remaining piping will occur during the Parcel 4.5 UST removal project scheduled for the summer of 1998. The BCT will perform a visual inspection to determine the requirement for remediation inside Building 254. If remediation is required, appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

Enclosure 2
Table 1 – Description of Property

Building Number and Property Description	EBS Parcel Designation	Condition Category	Remedial Actions
Building 257 is a 264 square foot building erected in 1942 that was used for vehicle fueling operations and a gas station. This parcel also includes a portion of the underground storage tank field.	4.7(6)	6	Screening Site 67 is associated with Building 257 because of the USTs and associated piping located south of the building. The piping, pumps and floor in this building will be cleaned in conjunction with the Parcel 4.5 UST removal project scheduled for the summer of 1998. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. In the past, Building 257 was fumigated. Air sampling for fumigants in other buildings similarly fumigated was performed in the winter of 1997. The BCT reviewed the air sample results and determined that no further action was required. The performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 263 is an 800 square foot building erected in 1964 that was used for oil changing and as a vehicle grease rack.	4.8(3)	3	The building has been used as an attendant's room for the dispensing of petroleum, oil and lubricants (POLs) to vehicles and was fumigated in the past. Screening Site 68 is associated with this building. Samples were taken. No contamination was detected, and the BCT determined that no further action was required. Air sampling for fumigants in other buildings similarly fumigated was performed in the winter of 1997. The BCT reviewed the air sample results and determined that no further action was required. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

Enclosure 2
Table 1 – Description of Property

Building Number and Property Description	EBS Parcel Designation	Condition Category	Remedial Actions
Pad 267 originally housed the facility engineer storehouse/pesticide shop. Square footage and date of erection is unknown. This building was demolished in 1987.	4.9(7)	7	The former pesticide shop, Building 267, was housed on this pad. Remedial Investigation Site 58 is associated with the pad. Due to the presence of pesticides found in soil samples, this parcel requires additional evaluation as part of the installation restoration program. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 273 is a 1,500 square foot building with an unknown erection date that was used as a shed for storage of fertilizer and mixing of golf course pesticides and herbicides. This parcel also includes the land around Building 273 as well as a small putting green adjacent and to the east of Building 273	4.10(7)	7	Remedial Investigation Site 59 is associated with this building. Due to the presence of pesticides found in soil samples, this parcel requires additional evaluation as part of the installation restoration program. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 253 is a 9,600 square foot building erected in 1952 that was used as a motor pool and vehicle maintenance shop.	4.11(1)	1	Screening Site 66 is associated with Parcel 4.5, which is the area surrounding Building 253 but not within the building. There is no remedial action required within Building 253.

Enclosure 2
Table 1 – Description of Property

Building Number and Property Description	EBS Parcel Designation	Condition Category	Remedial Actions
Building 265 is an 8,001 square foot building erected in 1942 that was used as an engineering and facility engineer maintenance shop.	4.13(4)	4	This building had a floor drain connected to the sanitary sewer. Due to an EBS recommendation to sample the floor drain, sampling occurred in September 1996. Upon review of the sample results, the BCT determined that the floor drain should be cleaned and that no further action would then be required for this building. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

¹ Provided the lessee strictly adheres to the Environmental Protection Provisions (Enclosure 5), including but not limited to Provision 14 - No subsurface disturbance, excavation, drilling or digging without prior written approval from the Government.

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 3

Table 2 - Notification of Hazardous Substance Storage, Release or Disposal

Building Number	Name of Hazardous Substance	Date of Storage, Release or Disposal	Remedial Actions
Building 260	Waste Paint, Paint Thinner, Solvent Rags	Exact start date unknown assumed 1952 (building construction)-September 1997	This building was a satellite drum accumulation area and housed a Safety Kleen unit. While the RCRA Facility Assessment (RFA) visual inspection noted staining on the floor in the sign shop of this building, the RFA recommended no further action and the BCT concurred in September 1997. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 254	Oil Antifreeze	Exact start date unknown assumed 1944 (building construction)-September 1997	Leaking drums and ground staining were observed during a visual inspection for the EBS. The BCT will perform a visual inspection to determine the requirement for remediation inside Building 254. If remediation is required, appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 257	Pesticide (fumigation)	Exact start date unknown assumed 1942 (building construction)-September 1997	In the past, Building 257 was fumigated. Air sampling for fumigants in other buildings similarly fumigated was performed in the winter of 1997. The BCT reviewed the air sample results and determined that no further action was required. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 263	Pesticide (fumigation)	Exact start date unknown assumed 1964 (building construction)-September 1997	The building has been used as an attendant's room for the dispensing of petroleum, oil and lubricants (POLs) to vehicles and was fumigated in the past. Air sampling for fumigants in other buildings similarly fumigated was performed in the winter of 1997. The BCT reviewed the air sample results and determined that no further action was required. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

Enclosure 3

Table 2 - Notification of Hazardous Substance Storage, Release or Disposal

Building Number	Name of Hazardous Substance	Date of Storage, Release, or Disposal	Remedial Actions
Pad 267	Pesticides	Exact start date unknown Building demolished in 1987	The former pesticide shop, Building 267, was located on this pad. Remedial Investigation Site 58 is associated with the pad. Due to the presence of pesticides found in soil samples, this parcel requires additional evaluation as part of the installation restoration program. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 273	Pesticides Herbicides Fertilizer	Exact start date unknown assumed 1942 (building construction)- September 1997	This building and area was reportedly used for the mixing of pesticides and herbicides for the golf course. Remedial Investigation Site 59 is associated with this building. Due to the presence of pesticides found in soil samples, this parcel requires additional evaluation as part of the installation restoration program. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 253	Antifreeze Safety Kleen unit	Exact start date unknown assumed 1952 (building construction)- September 1997	While there was small quantity storage within this building, there is no record of any releases. There is no remedial action required within Building 253. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

Enclosure 3
**Table 2 - Notification of Hazardous Substance Storage, Release
or Disposal**

Building Number	Name of Hazardous Substance	Date of Storage, Release, or Disposal	Remedial Actions
Building 265	Unknown	Exact start date unknown assumed 1952 (building construction)- September 1997	No evidence of storage, release or disposal. However, this building had a floor drain connected to the sanitary sewer. Due to an EBS recommendation to sample the floor drain, sampling occurred in September 1996. Upon review of the sample results, the BCT determined that the floor drain sump should be cleaned and that no further action would then be required for this building. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Parcel 4.5 - Open Area of Parcel 4. Includes all land in Parcel 4 except land included in Parcels 4.6, 4.7, 4.9 and 4.10.	PAHs	Exact start date unknown assumed 1942 - September 1997	The concern at Screening Site 66 is Poly Aromatic Hydrocarbons (PAHs) outside of Building 253. Due to the presence of PAHs found under the asphalt, this site requires additional evaluation as part of the installation restoration program. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

¹ Provided the lessee strictly adheres to the Environmental Protection Provisions (Enclosure 5), including but not limited to Provision 14 - No subsurface disturbance, excavation, drilling or digging without prior written approval from the Government.

Enclosure 4

Table 3 - Notification of Petroleum Product Storage, Release or Disposal

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 254	Oil	Exact start date unknown assumed 1944 (building construction)- September 1997	Leaking drums and ground staining were observed during a visual inspection for the EBS. The visual inspection also noted petroleum, oil and lubricants (POLs) and antifreeze storage. This building is in ECP category 6 based on the USTs and associated piping located to the west of the building. An 1,110-gallon gasoline UST was removed from this area in 1989. Removal of any remaining piping will occur during the Parcel 4.5 UST removal project scheduled for the summer of 1998. The BCT will perform a visual inspection to determine the requirement for remediation inside Building 254. If remediation is required, appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Building 263	Motor Oil	Exact start date unknown assumed 1964 (building construction)- September 1997	The building has been used as an attendant's room for the dispensing of petroleum, oil and lubricants (POLs) (oil changing) to vehicles. Screening Site 68 is associated with this building. Samples were taken. No contamination was detected, and the BCT determined that no further action was required. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an acceptable risk to human health or the environment. ¹
Building 257	Leaded and Unleaded Gasoline, Diesel	Exact start date unknown assumed 1942 (building construction)- September 1997	SS67 is associated with Building 257 because of the USTs and associated piping located south of the building. The piping, pumps and floor in this building will be cleaned in conjunction with the Parcel 4.5 UST removal project scheduled for the summer of 1998. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

Enclosure 4
**Table 3 - Notification of Petroleum Product Storage, Release
or Disposal**

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Building 253	Motor Oil and Lubricant Grease Products for Automobiles	Exact start date unknown assumed 1952 (building construction)- September 1997	While there was small quantity (exact quantity unknown) storage within this building, there is no record of any releases. There is no remedial action required within Building 253. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹
Parcel 4.5 - Open Area of Parcel 4. Includes Buildings T256 and T261 as well as all land areas within Parcel 4 except land areas included in Parcels 4.6, 4.7, 4.9 and 4.10.	Leaded and Unleaded Gasoline, Diesel	Exact start date unknown assumed 1942 - Summer 1998 for two USTs and two ASTs within Parcel 4.5	The concern at SS 68 is petroleum, oil and lubricants (POLs) located outside of Building 263. Samples were taken. Because no contamination was found, the BCT determined no further action was required. The general area of concern for Parcel 4.5 is the UST field adjacent to Buildings 254, T256 and 257. There have been five previous USTs, and there are currently two USTs in this parcel. Three USTs were removed in 1984 and two more were removed in 1989. The last two removed were replaced with the current 18,000-gallon and 20,000-gallon USTs. The two current USTs, all associated piping leading up to the pump house (Building 257) and any petroleum contaminated soils will be removed during the Parcel 4.5 UST removal project scheduled for the summer of 1998. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the environment. Therefore, the performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. ¹

¹ Provided the lessee strictly adheres to the Environmental Protection Provisions (Enclosure 5), including but not limited to Provision 14 - No subsurface disturbance, excavation, drilling or digging without prior written approval from the Government.

Enclosure 5

Environmental Protection Provisions

The following conditions will be placed in the lease to ensure there will be no unacceptable risk to human health or the environment and no interference to the ongoing Memphis Depot Caretaker installation restoration program (IRP) and to ensure regulatory requirements for the IRP and other compliance programs administered by the Army are met.

1. The sole purpose(s) for which the leased premises and any improvements thereon may be used, in the absence of prior written approval of the Government for any other use, is for uses similar or comparable to past or current activities of the Depot. These include light industry, storage, sorting operations, receiving, packaging and shipping, support activities, mechanical shop to support material handling equipment, training, education, and general office.
2. The Lessee shall neither transfer nor assign this Lease or any interest therein or any property on the leased premises, nor sublet the leased premises or any part thereof or any property thereon, nor grant any interest, privilege, or license whatsoever in connection with this Lease without the prior written consent of the Government. Such consent shall not be unreasonably withheld or delayed. Every sublease shall contain the Environmental Protection Provisions herein.
3. The Lessee and any sublessee shall comply with the applicable Federal, state, and local laws, regulations, and standards that are or may become applicable to Lessee's or sublessee's activities on the Leased Premises.
4. The Lessee and any sublessee shall be solely responsible for obtaining at its cost and expense any environmental permits required for its operations under the Lease, independent of any existing permits.
5. The Government's rights under this Lease specifically include the right for Government officials to inspect upon reasonable notice the Leased Premises for compliance with environmental, safety, and occupational health laws and regulations, whether or not the Government is responsible for enforcing them. Such inspections are without prejudice to the right of duly constituted enforcement officials to make such inspections. The Government normally will give the Lessee or sublessee twenty-four (24) hours prior notice of its intention to enter the Leased Premises unless it determines the entry is required for safety, environmental, operations, or security purposes. The Lessee shall have no claim on account of any entries against the United States or any officer, agent, employee, or contractor thereof.
6. The Government acknowledges that Defense Distribution Depot Memphis, Tennessee has been identified as a National Priorities List (NPL) Site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended. The Lessee acknowledges that the Government has provided it with a copy of the Defense Distribution Depot Memphis, Tennessee Federal Facilities Agreement (FFA)

Enclosure 5

Environmental Protection Provisions

entered into by the United States Environmental Protection Agency (EPA) Region 4, the State of Tennessee, and the Defense Logistics Agency effective March 1995, and will provide the Lessee with a copy of any amendments thereto. The Lessee agrees that should any conflict arise between the terms of such agreement as it presently exists or may be amended and the provisions of this Lease, the terms of the FFA will take precedence. The Lessee further agrees that notwithstanding any other provisions of the Lease, the Government assumes no liability to the Lessee or its sublessees or licensees should implementation of the FFA interfere with the Lessee's or any sublessee's or licensee's use of the Leased Premises. The Lessee shall have no claim on account of any such interference against the United States or any officer, agent, employee or contractor thereof, other than for abatement of rent.

7. The Government, EPA, and TDEC and their officers, agents, employees, contractors, and subcontractors, have the right, upon reasonable notice to the Lessee and any sublessee, to enter upon the Leased Premises for the purposes enumerated in these subparagraphs, and for such other purposes consistent with any provision of the FFA:

(a) to conduct investigations and surveys, including, where necessary, drilling, soil and water sampling, test-pitting, testing soil borings and other activities related to the Defense Distribution Depot Memphis, Tennessee installation restoration program (IRP) or FFA;

(b) to inspect field activities of the Government and its contractors and subcontractors in implementing the Defense Distribution Depot Memphis, Tennessee IRP or FFA;

(c) to conduct any test or survey required by the EPA or TDEC relating to the implementation of the FFA or environmental conditions at the Leased Premises or to verify any data submitted to the EPA or TDEC by the Government relating to such conditions;

(d) to construct, operate, maintain, or undertake any other response or remedial action, as required or necessary under the Defense Distribution Depot Memphis, Tennessee IRP or FFA, including, but not limited to, monitoring wells, pumping wells, and treatment facilities;

(e) to conduct Environmental Compliance Assessment System Surveys (ECAS).

8. The Lessee and any sublessee shall comply with the provisions of any health and safety plan in effect under the IRP or the FFA during the course of any of the above described response or remedial actions. Any inspection, survey, investigation, or other response or remedial action will, to the extent practicable, be coordinated with a representative designated by the Lessee and any sublessee. The Lessee and any sublessee shall have no claim on account of such entries against the United States or any office, agent, employee,

Enclosure 5

Environmental Protection Provisions

contractor, or subcontractor thereof. In addition, the Lessee and any sublessee shall comply with all applicable Federal, state, and local occupational safety and health regulations.

9. The Lessee further agrees that in the event of any assignment or sublease of the Leased Premises, it shall provide to the EPA and TDEC by certified mail a copy of the agreement or sublease of the Leased Premises (as the case may be) within fourteen (14) days after the effective date of such transaction. The Lessee may delete the financial terms and any other proprietary information from the copy of any agreement of assignment or sublease furnished pursuant to this condition.

10. The Lessee shall strictly comply with the hazardous waste requirements under the Resource Conservation and Recovery Act (RCRA) or its Tennessee equivalent. Except as specifically authorized by the Government in writing, the Lessee must provide at its own expense hazardous waste management facilities, complying with all laws and regulations. Government hazardous waste management facilities will not be available to the Lessee. Any violation of the requirements of this condition shall be deemed a material breach of this Lease.

11. Defense Distribution Depot Memphis, Tennessee accumulation points for hazardous and other wastes will not be used by the Lessee or any sublessee. Neither will the Lessee or sublessee permit its hazardous wastes to be commingled with hazardous waste of the Department of the Army.

12. The Lessee shall prepare and maintain a Government-approved plan for responding to hazardous waste, fuel, and other chemical spills prior to commencement of operations on the leased premises. Such a plan shall be independent of the Memphis Depot Caretaker plan and, except for initial fire response and/or spill containment, shall not rely on installation personnel or equipment. Should the Government provide any personnel or equipment, whether for initial fire response and/or spill containment, or otherwise on request of any Government officer conducting timely cleanup actions, the Lessee agrees to reimburse the Government for its costs.

13. The Lessee shall not construct or make or permit its sublessees or assigns to construct or make any alterations, additions, or improvements to, or installations upon or otherwise modify or alter the leased premises in any way which may adversely affect the Memphis Depot Caretaker environmental program, environmental cleanup, human health, or the environment, without the prior written consent of the Government. Such consent may include a requirement to provide the Government with a performance and payment bond satisfactory to it in all respects and other requirements deemed necessary to protect the interests of the Government. For construction or alterations, additions, modifications, improvements, or installations (collectively "work") in the proximity of operable units that are a part of a National Priorities List (NPL) site, such consent may include a requirement for written approval by the Government's Remedial Project Manager. Except as such

Enclosure 5

Environmental Protection Provisions

written approval shall expressly provide otherwise, all such approved alterations, additions, modifications, improvements, and installations shall become Government property when annexed to the Leased Premises.

14. The Lessee shall not conduct or permit its sublessees to conduct any subsurface excavation, digging, drilling, or other disturbance of the surface without the prior written approval of the Government.

15. The Lessee shall strictly comply with the hazardous waste permit requirements under the Resource Conservation and Recovery Act (RCRA), or its state equivalent, and any other applicable laws, rules or regulations. The Lessee must provide at its own expense such hazardous waste storage facilities that comply with all laws and regulations as it may need for such storage. Any violation of the requirements of this provision shall be deemed a material breach of this Lease.

16. LEAD-BASED PAINT WARNING AND COVENANT:

a. The Leased Premises do not contain residential dwellings and are not being leased for residential or child care purposes. The Lessee is notified that the Leased Premises contain buildings built prior to 1978 that contain lead-based paint.

b. Available information concerning known lead-based paint and/or lead-based paint hazards, the location of lead-based paint and/or lead-based paint hazards, and the condition of painted surfaces is contained in the Environmental Baseline Survey that has been provided to the Lessee. Additionally, the following report pertaining to lead-based paint and/or lead-based paint hazards has been provided to the Lessee: Lead Based Paint Risk Assessment for DDMT (Barge, Waggoner, Sumner, and Cannon, December 1995, revised April 1996). Additionally, the Lessee has been provided with a copy of the federally-approved pamphlet on lead poisoning prevention. The Lessee hereby acknowledges receipt of all of the information described in this subparagraph.

c. The Lessee acknowledges that it has received the opportunity to conduct a risk assessment or inspection for the presence of lead-based paint and/or lead-based paint hazards prior to execution of this Lease.

d. The Lessee shall not permit use of any buildings or structures on the Leased Premises for residential habitation without first obtaining the written consent of the Government. As a condition of its consent, the Government may require the Lessee to: (i) inspect for the presence of lead-based paint and/or lead-based paint hazards in and around buildings and structures on the Leased Premises; (ii) abate and eliminate lead-based paint hazards in accordance with all applicable laws and regulations; and (iii) comply with the notice and disclosure requirements under applicable federal, state, and local laws or regulations. The Lessee agrees to be responsible for any future remediation of lead-based paint found to be necessary on the Leased Premises.

Enclosure 5

Environmental Protection Provisions

e. The Government assumes no liability for remediation or damages for personal injury, illness, disability, or death, to the Lessee, its successors or assigns, sublessees or to any other person, including members of the general public, arising from or incident to possession and/or use of any portion of the Leased Premises containing lead-based paint as residential housing. The Lessee further agrees to indemnify and hold harmless the Government, its officers, agents and employees, from and against all suits, claims, demands or actions, liabilities, judgments, costs and attorneys' fees arising out of, or in any manner predicated upon, personal injury, death or property damage resulting from, related to, caused by or arising out of the possession and/or use of any portion of the Leased Premises containing lead-based paint as residential housing. This section and the obligations of the Lessee hereunder shall survive the expiration or termination of this Lease and any conveyance of the Leased Premises to the Lessee. The Lessee's obligation hereunder shall apply whenever the United States of America incurs costs or liabilities for actions giving rise to liability under this section.

17. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT:

a. The Lessee is hereby informed and does acknowledge that friable and non-friable asbestos or asbestos-containing materials (ACM) has been found on the Leased Premises, as described in the final base-wide EBS. The ACM on the Leased Premises does not currently pose a threat to human health or the environment. All friable asbestos that posed a risk to human health was either removed or encapsulated.

b. The Lessee covenants and agrees that its use and occupancy of the Leased Premises will be in compliance with all applicable laws relating to asbestos; and that the Government assumes no liability for future remediation of asbestos or damages for personal injury, illness, disability, or death, to the Lessee, its successors or assigns, sublessees, or to any other person, including members of the general public, arising from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos on the Leased Premises described in this Lease, whether the Lessee, its successors or assigns have properly warned or failed to properly warn the individual(s) injured. The Lessee agrees to be responsible for any future remediation of asbestos found to be necessary on the Leased Premises.

18. The Lessee shall not use the Leased Premises for the storage or disposal of non-Department of Defense owned hazardous or toxic materials, as defined in 10 U.S.C. 2692, unless authorized under 10 U.S.C. 2692 and properly approved by the Government.

19. The Army may impose any additional environmental protection conditions and restrictions during the terms of this lease that it deems necessary by providing written notice of such conditions or restrictions to the Lessee.

Enclosure 6

Regulatory/Public Comments on FOSL #4

Please find the Environmental Protection Agency (EPA), Tennessee Department of Environment and Conservation (TDEC), U.S. Department of Army (various offices), Army Materiel Command (AMC), Defense Logistics Agency (DLA) comments and Memphis Depot Caretaker responses for FOSL #4.

EPA Comments to FOSL #4

1. As required by CERCLA (Section 120(h)(5), DoD shall notify the state prior to entering into any lease that will encumber the property beyond the date of termination of DOD's operations. The notification shall include the length of lease, the name of lessee, and a description of the uses that will be allowed under the lease of the property. At National Priority List sites, DoD shall provide this notification to the United States Environmental Protection Agency as well.

COMMENT NOTED. The MDC will provide EPA and TDEC workable drafts of FOSLs as soon as they are available.

2. Section I - Purpose. The section should identify the leased properties as Parcels 4.4 to 4.11 and Parcel 4.13.

COMMENT INCORPORATED.

3. Section 2. Property Description. This section should read as follow:
"The proposed property to be leased consists of 5.93 acres that includes seven (7) buildings (parcels 4.4, 4.6-4.8, 4.10, 4.11 and 4.13), one (1) Pad (parcel 4.9) and open land areas (parcel 4.5). The buildings and Pad are identified as follows; Buildings 260, 254, 257, 263, 273, 253, 265 and Pad 267. The open land areas contain Buildings T256 and T261. A site map of the property is enclosed. (Enclosures and 1a)."

COMMENT INCORPORATED. The text has been changed with slight variations from the text provided.

4. Section 3.1 Environmental Condition of Property Categories The section should identify the parcel number associated with each property.

COMMENT INCORPORATED.

5. Section 3.2 Storage, Release, or Disposal of Hazardous Substances. Please delete *"Products"* after *"Substance"* (on line 10).

COMMENT INCORPORATED.

Enclosure 6
Regulatory/Public Comments on FOSL #4

6. Section 3.4 Polychlorinated Biphenyl's (PCB) Equipment. Please change "*unremediated*" to - - PCB- - and "*PCB equipment*" to - - the light ballasts- -.

COMMENT INCORPORATED. The second sentence will be changed to read, "There has been no evidence of unremediated PCB releases from the light ballasts."

7. Section 3.5 Asbestos. Please change "*asbestos containing material*" to - - *Asbestos Containing Material (ACM)*- -.

COMMENT INCORPORATED.

8. Section 4. Remediation. Please insert - - described in this document - - after "*property*" and change "*the property*" (after "*leasing*") to -- it- - (on line 4). The statement on lines 7-8 is inaccurate for properties categorized as 7. Please provide clarification.

COMMENT INCORPORATED. The sentence will be changed as follows, "Regulators have concurred with DDMT that Buildings 253, 260, 263 and 265 do not pose risks above levels deemed protective provided that the property is used for the proposed purpose and the lessee strictly adheres to the Environmental Protection Provisions (Enclosure 5). Buildings 254 and 257 shall be remediated during the summer of 1998 (see para. 3.3.1 Storage, Release or Disposal of Petroleum Products) and will not pose risks above levels deemed protective provided the property is used for the proposed purpose. The remaining property consisting of Building 273 and surrounding area, Building T261, Building T256, Pad 267 and the remaining open areas do not pose risks above levels deemed protective provided that the property is use for the proposed purpose and the lessee strictly adheres to the Environmental Protection Provisions (Enclosure 5)."

9. Section 5. Regulatory Coordination. Please add the following sentence at the end of the paragraph; "*Regulatory/public comments and responses are provided in Enclosure 6 and 7 respectively.*"

COMMENT INCORPORATED. Regulatory/public comments and responses will be provided in Enclosure 6.

10. Section 6. National Environmental Policy Act (NEPA) Compliance and Consistency with Local Reuse Plan. Please change "*Local Reuse Authority*" to - - *Depot Redevelopment Corporation*- - (on line 7).

COMMENT INCORPORATED.

11. Section 7. Environmental Protection Provisions. Please insert - - (Enclosure 5) - after "*Provisions*" (on line 4) and delete "*(Enclosure 5)*" (on line 5).

COMMENT INCORPORATED.

Enclosure 6
Regulatory/Public Comments on FOSL #4

12. Section 8. Finding of Suitability to Lease. Please insert - - (DOD)- - *after "Defense,"* also please change "*finding of suitability to lease*" to - - Finding of Suitability to Lease (FOSL)- -. In the second paragraph, line 2 please change "See " to - - Refer to ---

COMMENT INCORPORATED.

13. Enclosure 1. Please identify each parcel on both maps. There are two different maps labeled Enclosure 1, please re-label the second map as Enclosure 1a.

COMMENT NOTED. The large site map provides the relative position of the parcels within the entire facility. The text shall be change to reflect that site maps (plural) are included at Enclosure 1.

14. Enclosure 2. Parcel 4.5 should be described only one time. Please define Parcel 4.5 as the open land areas including Buildings T256 and T261. In other words combine rows 2 and 3 (page 10).

COMMENT NOTED. See the response to Army Office of Legal Counsel (John Farrar) comment number 5. While these buildings are included in the open area, which is a category 7 area, the buildings should not be a category 7. There is no information relating these two buildings to any storage, release or disposal of hazardous substances or petroleum products. Therefore, the buildings will be listed separately from the overall land area.

15. Page 10, row 1, column 4, on line 12 insert - - *or the environment-* - after "*human health.*"

COMMENT INCORPORATED. This change shall be made through out the document.

16. Page 10, row 2, column 4, on lines 7 to 15 delete "*Due to --- human health.*"

COMMENT NOTED. The Army requires a definitive statement concerning why there is no risk.

Enclosure 6
Regulatory/Public Comments on FOSL #4

17. Page 10, row 3, column 4, on lines 2-5 delete ".SS 67... *Parcel 4.5.* " Page 10, row 3, column 4, on lines 12-13 delete "*health and safety*", on line 15 insert - - *and the environment*- - after "*human health* ", on lines 15-20 delete "*Also, the... human health.* "

COMMENT NOTED. The phrase of "covered in" will be changed to "is addressed in." The "Also" in the last sentence will be deleted. The sentence that begins "Also, the..." will begin with "Therefore, the performance..." A footnote shall be added to the sentence that reads "Therefore, the performance of industrial and/or commercial... risk to human health or the environment," will be footnoted. The footnote will read "Provided the lessee adheres to the Environmental Protection Provisions (Enclosure 5), including but not limited to provision 14 (no subsurface disturbance, excavation, drilling, or digging without prior written approval from the Government)." This footnote will be added to the end of Tables 1, 2 and 3.

18. Page 11, row 1, column 1, this parcel also includes a land buffer of 50 feet and the Building was used as antifreeze storage (refer to BCT Minutes Sept. 1997). Page 11, row 1, column 4, on lines 10-11 delete "*health and safety* ", on lines 13-18 insert - - *and the environment*- - after "*human health* ", on lines 13-18 delete "*The performance... human health,*"

COMMENT NOTED. As described in the EBS, small point sources of contamination or storage, such as USTs, were delineated by circular 0.25-acre parcels centered on the source, as stipulated in DOD guidance. The text describing the parcel has been changed to include a description of the surrounding land. No deletions have been made as the language fulfills Army requirements and provide perspective tenants the information that remediation was conducted so in a safe and protective manner.

19. Page 11, row 2, column 1, parcel 4.7 also includes land surrounding the building as per the ECP map. Page 11, row 2, column 4, on lines 7-8 delete "*health and safety*", on line 10 insert - - *and the environment*- - after "*human health* ", on lines 17-21 delete "*The performance... human health.*"

COMMENT NOTED. See response to Comment 17.

20. Page 12, row 1, column 4, on lines 5-7 delete "*Samples were... is required*", on line 18 please insert - - or the environment- - after "*human health*".

COMMENT NOTED. The information provided documents the BCT decision of no further action and should be relayed to potential tenants. See Comment 18 response.

21. Page 12, row 2, column 4, on line 8 delete "*health and safety* ", on line 11 insert - - *and the environment*- - after "*human health* ", on lines 15-20 delete "*The performance .. human health.*"

COMMENT NOTED. See Comment 17 response.

Enclosure 6
Regulatory/Public Comments on FOSL #4

22. Page 13, row 1, column 1, please indicate that parcel 4.10 includes the land surrounding the building. Column 4, line 3 add - - and PAHs- - after "*pesticides*", on lines 6-7 delete "*health and safety*", on line 9 insert - - *and the environment*- - after- "*human health*", on lines 9-14 delete "*The performance... human health,*".

COMMENT NOTED. Subsurface sample results from the 1990 Law Environmental study indicated elevated levels of PAHs. However, surface soil samples taken during the latest round of sampling did not indicate elevated levels of PAHs. Dieldrin was the only contaminate in surface soil that exceeded screening levels (residential risk based concentrations). No text change.

23. Page 13, row 3, column 3, why is this Building a category 4 if NFA was recommended by the BCT. The category should be 3. Column 4, on line 12 insert - - *or the environment* - - after "*human health*."

COMMENT NOTED. PAHs and metals in sediments from the boiler room floor drain in Building 265 prompted the BCT to require action - encapsulation by filling in the drain with concrete. Once complete, no further action would be required for Building 265; therefore, the building fulfills the category 4 definition.

24. Enclosure 3. The title should be - - Notification of Hazardous Substance Storage, Release, or Disposal- -.

COMMENT INCORPORATED.

25. Page 14, row 1, column 4. on the last line insert - - *or the environment*- - after "*human health*" -

COMMENT INCORPORATED.

26. Page 14, row 3, column 4. on lines 6-7 delete "*health and safety*", on line 9 insert - - *and the environment* - - after "*human health*", on lines 9-12 delete "*The performance . . . human health.*"

COMMENT NOTED. See Comment 17 response.

27. Page 14, row 4, column 4, on the last line insert - - *or the environment*- - after "*human health*"

COMMENT INCORPORATED.

Enclosure 6
Regulatory/Public Comments on FOSL #4

28. Page 14, row 5, column 4. on the last line insert - - *or the environment-* - after *"human health."*

COMMENT INCORPORATED.

29. Page 15, row 1. column 4, on line 7 delete *"health and safety "*, on line 9 please insert - *and the environment-* - after *"human health"*, on lines 9-12 delete *"The performance... human health."*

COMMENT NOTED. See Comment 17 response.

30. Page 15. row 2. column 4, on line 8 delete *"health and safety "*, on line 10 insert - - *and the environment-*—after *"human health "*, on lines 10-13 delete *"The performance... human health"*

COMMENT NOTED. See Comment 17 response.

31. Page 15, row 3, column 4, on the last line insert - - *or the environment-* - after *"human health."*

COMMENT INCORPORATED.

32. Page 15, row 5, column 1 replace existing text for - -Parcel 4.5- -. Column 4, on line 6 delete *"health and safety"* on line 8 insert - - *and the environment-* - after *"human health "*, on lines 8-12 delete *"The performance... human health."*

COMMENT NOTED. See Comment 17 response.

33. Enclosure 4. The title should be - - Notification of Petroleum Product Storage, Release, or Disposal- -.

COMMENT INCORPORATED.

34. Page 16, row 1, column 4, on line 9 delete *"health and-safety."* On line 12 insert - - *and the environment-* - after *"human health "*, on lines 12-15 delete *"The performance. . human health."*

COMMENT NOTED. See Comment 17 response.

35. Page 16, row 2, column 4, on the last line insert - - *or the environment-* - after *"human health."*

COMMENT INCORPORATED.

Enclosure 6
Regulatory/Public Comments on FOSL #4

36. Page 16, row 3, column 4. on the last line insert - - *or the environment-* - after "*human Health.*"

COMMENT INCORPORATED.

37. Page 17, row 1, column 4, on the last line insert - - *or the environment-* - after "*human health.*"

COMMENT INCORPORATED.

38. Page 17, row 5, column 1 replace existing text for - -Parcel 4.5- -. Column 4, on line 18 delete "*health and safety*", on line 20 insert - - *and the environment-* - after "*human health* ", on lines 20-24 delete "*The performance... human health.*".

COMMENT NOTED. See Comment 17 response. Text for Parcel 4.5 will include the buildings located within the parcel.

39. Enclosure 5. Please note that in Provision #17(b) "Grantor" should be- - *the Department of Defense-* -.

COMMENT INCORPORATED.

40. Enclosure 5. Please note that "GRANTEE" in Provision #18(b) should be -*Lessee-*.

COMMENT INCORPORATED.

41. Enclosure 5. Provision #19 implies that there are DoD hazardous or toxic materials stored at the Depot.

COMMENT NOTED. It is an important covenant in that it tells the Lessee that hazardous substances shall not be brought onto the property unless specifically allowed by the Government.

TDEC Comments on FOSL #4

1. Section 3.1. Include parcel numbers for ECP category.

COMMENT INCORPORATED.

2. Section 3.5. Clarify if ACM is assumed to be present or if a survey will be completed for Buildings 273, T256 and T261, which indicate no survey completed.

COMMENT INCORPORATED.

Enclosure 6
Regulatory/Public Comments on FOSL #4

3. Site maps. Better delineate or note the buildings not included in this FOSL.

COMMENT INCORPORATED.

U.S. Department of Army Comments on FOSL #4

Office of Legal Council (John Farrar)

1. Para 3.2--Bldg. 265 is listed as a Condition Category 4 in Table 1 (description of Property). Should it be listed in paragraph 3.2?

COMMENT INCORPORATED. Table 2 will also reflect this change.

2. Para 3.6--Table 1 (Description of Property) shows Bldg. 265 as being construction in 1942. It should be added to the list of buildings built prior to 1978.

COMMENT INCORPORATED.

3. Encl. 1--The large scale map and the smaller scale map do not match each other. The large scale map has a rectangle portion missing from the bottom right hand portion of the area. The smaller scale map does not have this missing portion.

COMMENT INCORPORATED.

4. Encl. 1--The small scale map does not reflect the buildings listed in the FOSL 4. The map reflects Bldg. 251, 252 and 270, which are not in the FOSL 4. Bldg. 273 and 267 (pad) are not shown on the map.

COMMENT NOTED. Buildings 251, 252 and 270 are not included in this FOSL; however, the buildings must still be shown for accuracy. The proposed tenant for these three buildings as well as the property included in FOSL #4 is the Memphis Police Department. Buildings 251, 252 and 270 were included in previous FOSLs. The map has been changed to show Building 273 and Pad 267.

5. Table 1 (Description of Property)--On the first page, Building T256 and T261 are listed in the same paragraph. It would be easier to follow if these two buildings were listed separately.

COMMENT INCORPORATED. Because these two small buildings were never listed with their own BRAC Parcel number, there will be three EBS Parcel Designations of 4.5(7) in this table. The ECP category listing in paragraph 3.1 describes Parcel 4.5 as including the open area and two buildings.

Enclosure 6
Regulatory/Public Comments on FOSL #4

6. Table 1 (Description of Property)--Building 257 and 263 have had air monitoring undertaken. The statement needs to be rewritten to make the statement clearer. It appears to me that the current statement leads one to believe that the results of air monitoring in other buildings on the base was used for the results in this report. (This comment applies to Table 2 as well.)

COMMENT NOTED. The reader's interpretation is correct. The BCT agreed to sample a few representative buildings that were historically fumigated to address all of the fumigated buildings on the property. The BCT determined that no risk was associated with historical fumigation since air sampling results were well below OSHA standard for fumigants in worker areas.

Army OGC (Craig Teller)

No legal objection

Army TJAG (MAJ Allison Polchek)

No legal objection

Army BRACO (Ms. Robin Mills)

1. HQDA/BTT should not be in a position of reviewing FOSLs that have not been staffed with the regulators first. I can see that there will be exceptions, but HQDA/BTT needs to know (for political reasons if nothing else) whether or not the regulators concur/non-concur with the FOSL.

COMMENT NOTED.

2. Page 3. Please clarify whether or not the regulators have signed off on the Cat 1 property (CERFA Clean??).

COMMENT NOTED. Regulators have approved the category 1 properties at BRAC Cleanup Team meetings following discussions of sampling data.

3. Page 5. Please clarify/state that the sites that caused the NPL listing are/or are not part of this lease (or does contaminated groundwater underlie the buildings????).

COMMENT NOTED. Sites that caused the NPL listing are not included in this lease; however, sites recognized by the regulators as CERCLA sites, which are included in the CERCLA remedial investigation and considered part of the NPL site, are in this lease (i.e. all grassy areas and all rail road tracks).

Enclosure 6

Regulatory/Public Comments on FOSL #4

4. Page 11, the "Open Area of Parcel". It is unclear from the FOSL on whether or not this parcel is "suitable for lease for the intended use". An explanation as to WHY it is suitable needs to be given based on the on-going status of cleanup on the parcel. It may also be wise to point out in the protection provisions any restrictions/access that will be needed based on the on-going work. A statement concerning the "suitableness" of this parcel needs to be in the body of the FOSL as well as in the protection provisions.

COMMENT NOTED. A footnote shall be added to this sentence that will read, "Provided the lessee adheres to the Environmental Protection Provisions (Enclosure 5), including but not limited to provision 14 (no subsurface disturbance, excavation, drilling, or digging without prior written approval from the Government)." This footnote will be added to the end of Tables 1, 2 and 3.

5. Did the installation really have incidents of release up to Sep 97!!! as Table 2 implies??

COMMENT NOTED. Table 2 also refers to storage. These buildings may have stored hazardous substances until September 1997.

AMC Legal (MAJ Michael Stump)

1. The FOSL Number 4 has been reviewed and it is not legally sufficient for the two following reasons.

COMMENT NOTED.

2. Para. 3.3.1. Petroleum Products. You need to explain why there is no unacceptable risk to human health and the environment from the unremediated petroleum products and why the proposed lease will not interfere with necessary remediation:

COMMENT NOTED. Table 2 - Notification of Hazardous Substance Storage, Release or Disposal and Table 3 - Notification of Petroleum Product Storage, Release or Disposal provide specific details for the individual parcels or buildings included in this FOSL, including why there is no unacceptable risk.

3. Para. 4 Remediation. You need to explain why there is no unacceptable risk to human health and the environment from in place remediation activities or unremediated sites, and why the proposed lease will not interfere with ongoing or planned remediation.

COMMENT NOTED. Table 2 - Notification of Hazardous Substance Storage, Release or Disposal and Table 3 - Notification of Petroleum Product Storage, Release or Disposal provide specific details for the individual parcels or buildings included in this FOSL, including why there is no unacceptable risk.

Defense Logistics Agency Comments on FOSL #4

Enclosure 6
Regulatory/Public Comments on FOSL #4

HQ-DLA (Jeanne Masters)

1. DLSC-BBB comment, which I believe Karen addressed, is the map on page 10 does not show buildings 273 and 267.

COMMENT INCORPORATED.

HQ-DLA (Legal Real Estate)

1. I have read the Army Materiel Command Guidance for FOST/FOSL. The above-noted Finding of Suitability to Lease (FOSL) were reviewed in light of that guidance. Inasmuch as the provisions to be included in the leases for Environmental Protection during the lease term are basically boilerplate, I will defer to the Army on the inclusion of those provisions. The language is repeated in the three documents and notes that the property is listed on the National Priorities List. Covenants for asbestos contamination, PCBs, lead-based paints, etc. are contained in the documents. Although we acknowledge the existence of the contaminants we ask the lessees to hold us harmless. Whether or not we would be sustained in these indemnifications and hold harmless provisions may be a legal issue not resolved now. The documents also outline contaminants stored on the property or utilized on the property. We do not know whether DLA is or was a contributory party to the use of the hazardous substances but it is noted that in certain instances remediation has taken place or a process for remediation has commenced. As a note in review, one wonders whether a policy of spraying dieldrin for pesticide purposes was considered a necessary property maintenance activity whether it was warranted or not. Was there any evidence of pest infestation to merit such use?

To be consistent with the FOSL guidance models, we need to make express statements that the proposed leases are consistent with the redevelopment plans proposed by the Memphis LRA.

Secondly I note in review that our documents are still in review by local environmental authorities and EPA. The Section 5 analysis is therefore incomplete because of the concurrent review. Otherwise I find no legal insufficiency in the documents meriting redrafting or significant change in format."

COMMENT NOTED. Paragraph 1. PURPOSE will include this sentence, "This FOSL has been developed in accordance with the Depot Redevelopment Corporation's Reuse Plan."

Enclosure 6
Regulatory/Public Comments on FOSL #4

HQ-DLA (Karen Moran)

1. Page 3, description of cat 7 is confusing, Bldg. 273 is not on the map, nor is pad 267, and T256 and T261 are shown on the map without the "T." The last two lines should be clarified if possible.

COMMENT INCORPORATED.

2. Page 5, para 3.7, should we say "the Army or DLA"?

COMMENT NOTED. Changed to read Department of Defense.

3. Page 7, para 8, line 7, correct word use/type, "and there adequate..."

COMMENT INCORPORATED. The word "are" will be inserted between "there...adequate..."

4. Page 10, Property map seems to be missing several things -- see comment for page 3 above -- including building 273.

COMMENT INCORPORATED.

5. Page 12, top of right column, correct printing error at title block.

COMMENT NOTED. Upon review, the printing error was not located.

6. Page 12, bldg. 257, right column, the sentence "Building 257 was fumigated." could be clarified by adding words like "in the past" since it follows description of contemporary cleanup measures. Same comment when the same sentence or similar wording is used in other locations in the tables.

COMMENT INCORPORATED.

7. Page 5, para 5. Did we really do anything yet to get comments from the public? Seems like the answer is no, as there are no "public" comments in Encl 6. Also, IAW AMC FOSL/FOST guidance, p. 14, has the official regulatory/public comment period commenced yet?

COMMENT NOTED. The Restoration Advisory Board was informed about the development of FOSL 4 and the properties included in FOSL 4.

Enclosure 6

Regulatory/Public Comments on FOSL #4

8. Enclosure 1. The confusion about the maps continues -- understanding the parcel designations would be much easier if the map on Page 2 showed the parcel designations, since the parcels are referred to so frequently in the document. Page 2 wording is double printed. Suggest an addition to the wording on Page 2, explaining why the four buildings are not included in this FOSL (e.g., "This FOSL does not include XXX as they are included in earlier FOSLs 1 and 2").

COMMENT INCORPORATED.

9. Enclosure 3, Page 1. Let's provide a (footnote?) explanation of what the EBS parcel designations stand for, if we need to include the level of detail shown for building 260. For bldgs T256 and T261, the second and third sentences under remedial action may not convey the message intended. Suggest relocating the section on the open area of parcel 4 (parcel 4.5?) so readers see that before reading the references to parcel 4.5 in sections on bldgs. T256 and T261.

COMMENT NOTED. This response assumes the commentor was referring to Enclosure 2. The EBS CERFA categories are defined in footnote fashion at the end of Table 1. The information regarding T256 and T261 under remedial action was intended to convey that no remedial actions are planned or foreseeable for these structures, but these structures are considered category 7 because of their inclusion in parcel 4.5.

10. Enclosure 2, Page 2. Bottom of page mislabeled Encl 2 as Encl 3. For the Open Area entry under Remedial Action, the reference to SS66 could not be found in Table 3, parcel 4.5 as described; in fact nothing was listed at parcel 4.5 in table 3. Also this section would be clearer if it started with the current third sentence ("The general area of concern for). Suggest rewording.

COMMENT INCORPORATED. The page label for Encl 2 appeared correctly in the FOSL preparer's computer. The "Parcel 4.5" designation has been added to the Table 3 entry for the "Open Area in Parcel 4." This entry does contain the information for SS66.

11. Enclosure 3, Page 2. In both the entries for pad 267 and bldg. 273, the 4th and 5th sentences do not really seem to address the issue of whether the area is safe now or not, aside from the issue of whether or not it will be safe during remediation.

COMMENT NOTED. Per EPA comment 17 and MDC response, a footnote was added to this table that reads, "Provided the lessee adheres to the Environmental Protection Provisions (Enclosure 5), including but not limited to provision 14 (no subsurface disturbance, excavation, drilling, or digging without prior written approval from the Government)." This footnote was added to Tables 1, 2 and 3 and addresses the question of "Is it safe." Yes, provided the lessee adheres to the provisions.

12. Enclosure 4, page 2, Entry for Open Area. Isn't this really parcel 4.5? If so, let's say so.

Enclosure 6
Regulatory/Public Comments on FOSL #4

COMMENT INCORPORATED. All table entries for the Open Area now include Parcel 4.5 designation.

13. Enclosure 6, page 1, comment 3 response. The EPA wording helps to understand which parcels are which, particularly parcel 4.5. Consider using more of it.

COMMENT NOTED.

14. Enclosure 6, page 1, comment 14 response. Sentence states "the buildings should not be category 7." What should they be? Currently they are shown in para 3.1 and Table 1 as cat 7. Reword to reexplain this statement so it will be understood better by other readers and seem less contradictory.

COMMENT NOTED. The wording has been removed.

15. Enclosure 6, page 3, comment 18 and response. It is not clear what this was about. Was something left out?

COMMENT NOTED. Nothing was left out of the comment or response.

16. Enclosure 6, page 9, comments 1 and 2. Need a better response.

COMMENT NOTED. The BRAC Environmental Coordinator (BEC) requested clarification of these comments during preparation of comment responses. On June 8, 1998, he received clarification of the comments in question and has prepared appropriate responses.

17. Enclosure 6, page 9, comment 1 from Legal Real Estate. Comments in first paragraph, including a question regarding pesticide use, were not addressed.

COMMENT NOTED. No action was specified in the first paragraph other than the pesticide question. We have no information available regarding Army pesticide application methods or DLA applications dating to the use of dieldrin.

18. General Comment. If the comments are response portions of the FOSL are to be public documents, they should be written in a way that is not confusing or misleading to the public.

COMMENT NOTED.

Enclosure 6
Regulatory/Public Comments on FOSL #4

DLA - Memphis Depot Caretaker Environmental Division

1. The third sentence in Paragraph 3.2 needs to read, "The release or disposal of these hazardous substances was either remediated at the time of release or is currently under evaluation as part of the installation restoration program."

COMMENT INCORPORATED.

Enclosure 7

References

I. The statutory and regulatory requirements relating to FOST/FOSLs are as follows:

CERCLA §120(h), 42 U.S.C. §9620(h) - Property Transferred by Federal Agencies

10 U.S.C. § 2667(f) as amended by section 2906 of the FY 94 Defense Authorization Act requiring DOD and EPA to consult on FOSL procedures

40 CFR PART 373 - Reporting Hazardous Substance Activity when Selling or Transferring Federal Real Property.

II. The DOD Guidance relating to FOST/FOSLs is as follows:

DOD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer (FOST) for Property Where Release or Disposal has Occurred, dated 1 June 1994.

DOD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer (FOST) for Property Where No Release or Disposal has Occurred, dated 1 June 1994.

DOD Policy on the Environmental Review Process to Reach a Finding of Suitability to Lease (FOSL), dated 18 May 1996.

DOD Fast Track to FOST - A Guide to Determining if Property is Environmentally Suitable to Transfer , July 1997

DOD Fact Sheet – A Field Guide to FOSL, Fall 1996

DOD Memorandum, Subject: Clarification of "Uncontaminated" Environmental Condition of Property at Base Realignment and Closure (BRAC) Installations, dated 21 October 1996

DOD Memorandum, Subject: Asbestos, Lead paint and Radon Policies at BRAC Properties, dated 31 October 1994

III. U.S. Environmental Protection Agency (EPA) Guidance

Guidance for Evaluation of Federal Agency Demonstrations that Remedial Actions are Operating Properly and Successfully Under CERCLA Section 120(h)(3), (Interim), dated August 1996

Enclosure 7

References

EPA Memorandum, Subject: Military Base Closures: Guidance on EPA concurrence in the Identification of Uncontaminated Parcels under CERCLA Section 120(h)(4), re-issued March 27, 1997

IV. Department of the Army Guidance

AR 200-1, Environmental Protection and Enhancement, dated 21 February 1997

DAIM-BO Memorandum, Subject: Clarification of Meaning of Uncontaminated Property for Purposes of Transfer by the United States, dated 9 December 1996

V. WWW BRAC Sites

1. DOD Sites –

DOD Base Closure and Transition Office –
<http://emissary.acq.osd.mil/bctoweb/bctohome.nsf>

DOD Environmental Base Realignment and Base Closure (BRAC) Program
<http://www.dtic.mil/envirodod/envbrac.html>

DOD Base Closure and Community Reinvestment
<http://www.acq.osd.mil/iai/bccr.htm> DOD Office of Economic Adjustment
<http://www.acq.osd.mil/oea/index.html>

2. Environmental Protection Agency EPA OSWER Federal Facilities Base Realignment and Closure

<http://www.epa.gov/swerffrr/brac.htm>

3. Department of the Army Base Realignment and Closure Office

<http://www.hqda.army.mil/acsimweb/brac/brac3.htm>

CERL BRAC/NEPA "How To" Manual
<http://www.cecer.army.mil/facts/sheets/PL19.html>

Corps of Engineers Base Realignment and Closure (Camp Bonneville)
- Good Slide Presentation
<http://www.nps.usace.army.mil/geotech/bnvl/brac95/index.htm>

Presidio of San Francisco BRAC Environmental Restoration Program
- General information as well as facts on Presidio Cleanup and Conversion
<http://www.presidiosanfran.com>

Enclosure 7

References

4. Department of the Air Force Air Force Base Conversion Agency

<http://www.afbca.hq.af.mil>

5. Department of the Navy

NAVY NAVFAC Base Closure Site
<http://164.224.238.53:81/csohome.nsf>

Navy Facilities Engineering Command - information on Navy BRAC sites
http://www.ncts.navy.mil/homepages/navfac_es/bcp.htm

Navy Environmental BRAC News
<http://www.navy.mil/homepages/navfac/env/newslet.html>