



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

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receive  
SEP 08 1999

REPLY TO  
ATTENTION OF

2 AUG 1999

AMCEN-R

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

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

SUBJECT: Finding of Suitability to Lease (FOSL-8) for Defense  
Distribution Depot Memphis, Tennessee (DDMT)

1. Reference memorandum, AMCEN-R, 3 Apr 97, subject: Report of Availability for a Master Lease with the Memphis Depot Redevelopment Agency.
2. Enclosed for your action is the approved FOSL-8 (Encl 1) with supporting documentation for adding Parcels 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, 3.11, 13.5, 14.2, 15.2, 15.3, 15.4, 15.5, 15.6, 18.2, 19.1, 19.2, 19.3, 20.1, 20.5, 20.6, 21.5, 22.1, 22.2, 23.6, 23.7, 23.8, 23.9, 23.10, 23.11, 24.1, 24.2, 25.1, 25.2, 26.1, 26.2, 27.1, 28.1, 28.2, 29.2, 29.3, 30.2, 30.3, 30.4, 30.5, 31.1, 32.3, 33.6, 33.7, 33.8, 33.9, 34.2, 35.1, 35.2, 35.3, 35.4, and 35.5 at DDMT to the Master Lease with Memphis Depot Redevelopment Agency.
3. The approved Report of Availability (ROA) for the entire installation, including the property addressed in this FOSL-8, was forwarded with reference.
4. The Final Environmental Assessment for Master Lease, DDMT, dated Sep 96, is the National Environmental Policy Act Document for this action.
5. Request a modification to the Master Lease adding those parcels referenced in paragraph 2 above and to be executed in accordance with the ROA and this FOSL-8.

AMCEN-R

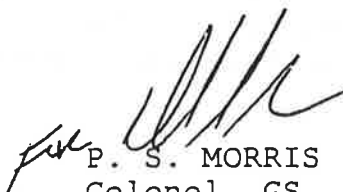
SUBJECT: Finding of Suitability to Lease (FOSL-8) for Defense  
Distribution Depot Memphis, Tennessee (DDMT)

6. Points of contact for this action are Mr. John Farrar,  
AMCEN-R, commercial (703) 617-0726, DSN 767-0726, or Mr. Joe  
Goetz, AMCEN-R, commercial (703) 617-8904, DSN 767-8904.

7. AMC -- Your Readiness Command . . . Serving Soldiers Proudly!

FOR THE COMMANDER:

7 Encls

  
P. S. MORRIS  
Colonel, GS  
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

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

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

## FINDING OF SUITABILITY TO LEASE

(FOSL)

*Parcel 3.5, Parcel 3.6, Parcel 3.7, Parcel 3.8, Parcel 3.9, Parcel 3.10, Parcel 3.11, Parcel 13.5, Parcel 14.2, Parcel 15.2, Parcel 15.3, Parcel 15.4, Parcel 15.5, Parcel 15.6, Parcel 18.2, Parcel 19.1, Parcel 19.2, Parcel 19.3, Parcel 20.1, Parcel 20.5, Parcel 20.6, Parcel 21.5, Parcel 22.1, Parcel 22.2, Parcel 23.6, Parcel 23.7, Parcel 23.8, Parcel 23.9, Parcel 23.10, Parcel 23.11, Parcel 24.1, Parcel 24.2, Parcel 25.1, Parcel 25.2, Parcel 26.1, Parcel 26.2, Parcel 27.1, Parcel 28.1, Parcel 28.2, Parcel 29.2, Parcel 29.3, Parcel 30.2, Parcel 30.3, Parcel 30.4, Parcel 30.5, Parcel 31.1, Parcel 32.3, Parcel 33.6, Parcel 33.7, Parcel 33.8, Parcel 33.9, Parcel 34.2, Parcel 35.1, Parcel 35.2, Parcel 35.3, Parcel 35.4 and Parcel 35.5*

Defense Distribution Depot Memphis, Tennessee

(FOSL Number 8)

July 1999

## **1. PURPOSE**

The purpose of this Finding of Suitability to Lease (FOSL) is to document the environmental suitability of Parcels 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, 3.11, 13.5, 14.2, 15.2, 15.3, 15.4, 15.5, 15.6, 18.2, 19.1, 19.2, 19.3, 20.1, 20.5, 20.6, 21.5, 22.1, 22.2, 23.6, 23.7, 23.8, 23.9, 23.10, 23.11, 24.1, 24.2, 25.1, 25.2, 26.1, 26.2, 27.1, 28.1, 28.2, 29.2, 29.3, 30.2, 30.3, 30.4, 30.5, 31.1, 32.3, 33.6, 33.7, 33.8, 33.9, 34.2, 35.1, 35.2, 35.3, 35.4 and 35.5 at the former Defense Distribution Depot Memphis, Tennessee (the Depot) for inclusion in the Interim Master Lease held by the Depot Redevelopment Corporation (DRC) for light industry, storage, general office and recreation 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 and 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 367.52 acres which includes fifty-seven (57) parcels. Included in these parcels are thirty-three (33) buildings (Buildings 194, 197, 211, 301, 308, 309, 319, 398, T416, T417, 465, 468, 469, 717, 720, 737, 783, 793, 801, 802, 863, 865, 873, 875, 949, 970, 1084, 1086, 1087, 1088, 1089, 1090 and 1091); concrete foundations remaining after the demolition of Buildings 209, 702 and 1085; open land areas surrounding these buildings and foundations and extending to Airways Boulevard, Dunn Road, Ball Road and Perry Road; open storage areas X01, X02, X03, X04, X05, X06, X07, X08, X09, X10, X11, X12, X17, X19, X20, X21, X23, X27, X30, Y10, Y50; spill area west of Building 737; spill area on the north dock of Building 489; spill area between Buildings 489 and 490; spill area east of Building 685; spill area between Buildings 925 and 949; spill area northwest of Building 995; former material recoupment area at southeast corner of Building 873; former waste material storage area west of Buildings 308 and 309; recreational area including the golf course, playground, softball field, volleyball and tennis courts, wading pool and open land area surrounding the community club complex; Lake Danielson and associated storm drain ditch; the golf course pond and associated storm drain ditch; open land area between east ends of Buildings 689 and 690; open land area surrounding Building 972; storm drain adjacent to Gate 9; former spray paint area south of Building 949; open land area surrounding Buildings 490, 689 and 690; open land area surrounding Buildings 470, 489 and 670; and a former aboveground storage tank east of Building 770. Site maps of the property proposed for lease 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: Nuclear Regulatory Commission letter approving Building 319 for unrestricted use (April 16, 1999), Final Baseline Risk Assessment for Golf Course Impoundments (Radian International, May 1999), Final Streamlined Risk Assessment Parcel 3 Technical Memorandum (CH2M Hill, January 1999), BRAC Cleanup Plan Version 2



(DDSP-FE, October 1998), Revised BRAC Parcel Summary Reports (CH2M Hill, October 1998), Final Remedial Investigation Sites Letter Reports (CH2M Hill, May 1998), Final Screening Sites Letter Reports (CH2M Hill, March 1998), Environmental Baseline Study Radiological Survey for Defense Distribution Depot Memphis (ASCE-IW, August 1996), Termination Radiological Survey for Defense Distribution Depot Memphis Building 319, Bay 6 (ASCE-IW, April 1997), Asbestos Reinspection (DDC-WP, October 1996), Final Environmental Assessment for Master Interim Lease (Tetra Tech, September 1996), DDMT Radiological Survey (Administrative Support Center East, August 1996), Remedial Investigation Soil Sampling Letter Report (CH2M Hill, May 1997), OUs 2, 3 and 4 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 property are as follows:

- |                 |  |
|-----------------|--|
| ECP Category 1: | Parcel 30.4 - Building 949   |
| ECP Category 2: | Parcel 20.1 - Spill area on north dock of Building 489   |
|                 | Parcel 23.9 - Spill area northwest of Building 995   |
|                 | Parcel 26.2 - Building 970   |
|                 | Parcel 33.6 - Spill area west of Building 737  |
| ECP Category 3: | Parcel 15.2 - Building 308   |
|                 | Parcel 15.4 - Building 702 concrete foundation   |
|                 | Parcel 18.2 - Open land area surrounding Building 560  |
|                 | Parcel 19.1 - Building 468 and open land area surrounding Buildings 465, 468 and 469 (Building 467, fabric tension structure, removed in 1996) |
|                 | Parcel 19.2 - Building 465   |
|                 | Parcel 23.6 - Open land area surrounding Buildings 783, 787 and 793, Gates 6, 7 and 8, and extending to Ball Road                              |
|                 | Parcel 23.7 - Building 783   |
|                 | Parcel 23.8 - Building 793   |
|                 | Parcel 23.10 - Open storage area X01   |
|                 | Parcel 28.1 - Open storage area X04 and open land area extending to Perry Road   |
|                 | Parcel 33.8 - Building 863   |
|                 | Parcel 34.2 - Open land area surrounding Building 360  |
| ECP Category 4: | Parcel 15.3 - Building 319   |
|                 | Parcel 19.3 - Building 469   |
|                 | Parcel 25.1 - Building 873   |
|                 | Parcel 30.2 - Spill area between Buildings 925 and 949   |
| ECP Category 5: | Parcel 24.1 - Former material reclamation area at southeast corner of Building 873   |

- ECP Category 6:
- Parcel 15.5 - Former waste material storage area west of Buildings 308 and 309
  - Parcel 25.2 - Building 875 and open land area surrounding Buildings 873 and 875
  - Parcel 28.2 - Building 1089 and surrounding open land area extending to Perry Road
  - Parcel 35.1 - Building 1090
  - Parcel 35.2 - Building 1084, Building 1085 concrete foundation and surrounding open land area
  - Parcel 35.3 - Building 1086
  - Parcel 35.4 - Building 1087, metal-roofed shed south of Building 1088 and open land area surrounding south ends of these buildings
  - Parcel 35.5 - Buildings 1088 and 1091 and surrounding open land area extending to Perry Road

- ECP Category 7:
- Parcel 3.5 - Recreational area including the golf course, playground, softball field, volleyball and tennis courts, wading pool, Buildings 194, 197 and 398, and open land area surrounding the community club complex extending to Ball Road
  - Parcel 3.6 - Lake Danielson
  - Parcel 3.7 - Lake Danielson storm drain ditch
  - Parcel 3.8 - Golf course pond
  - Parcel 3.9 - Golf course pond storm drain ditch
  - Parcel 3.10 - Former pistol range near Hole 9
  - Parcel 3.11 - Former flamethrower test site west of Hole 9
  - Parcel 13.5 - Building 211, Gates 23, 24 and 25, and surrounding open land area extending to Airways Boulevard
  - Parcel 14.2 - Building 209 concrete foundation and surrounding open land area extending to Airways Boulevard and to Dunn Road
  - Parcel 15.6 - Open storage areas X09, Y10 and Y50, Buildings 301, 309, T416, T417, 701 and 717 and surrounding open land area extending to Dunn Road
  - Parcel 20.5 - Open land area surrounding Buildings 470, 489 and 670
  - Parcel 20.6 - Spill area between Buildings 489 and 490
  - Parcel 21.5 - Open land area surrounding Buildings 490, 689 and 690
  - Parcel 22.1 - Open land area between east ends of Buildings 689 and 690
  - Parcel 22.2 - Spill area east of Building 685
  - Parcel 23.11 - Open land area surrounding Building 995
  - Parcel 24.2 - Open storage area X03
  - Parcel 26.1 - Open land area surrounding Building 970
  - Parcel 27.1 - Open land area surrounding Building 972

- Parcel 29.2 - Open storage areas X27 and X30, Buildings 801 and 802, and surrounding open land area extending to Dunn Road and to Perry Road
- Parcel 29.3 - Storm drain ditch adjacent to Gate 9
- Parcel 30.3 - Open storage area X23 and open land area surrounding Buildings 925 and 949
- Parcel 30.5 - Former spray paint area south of Building 949
- Parcel 31.1 - Open storage areas X17, X19, X20 and X21
- Parcel 32.3 - Open storage area X02, Building 865 and surrounding open land area
- Parcel 33.7 - Former aboveground storage tank east of Building 770
- Parcel 33.9 - Open storage areas X05, X06, X07, X08, X10, X11 and X12, Buildings 720 and 737, and open land area surrounding Buildings 720, 737, 753, 755, 756, 860 and 863

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 at the following locations: Buildings 194, 308, 319, 469, 720, 737, 783, 793, 865, 873, 875, 1084, 1086, 1087, 1089, 1090 and 1091; open storage areas X03, X07, X08, X10, X11, X12, X17, X19, X20, X21, X23, Y10 and Y50; former waste material storage area west of Buildings 308 and 309 (Parcel 15.5); former material recoupment area at southeast corner of Building 873 (Parcel 24.1); and open land area surrounding Buildings 925 and 949. It is assumed this storage was in excess of the 40 CFR Part 373 reportable quantities. Hazardous substances were also stored in Building 702 (Parcel 15.4/demolished in 1998), the officer's hobby shop, in small quantities for use by military officers. Hazardous substances were released at the following locations: inside Buildings 465, 469, 737, 863, 865, 873, 1086 and 1087; open storage area X10; Lake Danielson (Parcel 3.6) and associated storm drain ditch (Parcel 3.7); golf course pond (Parcel 3.8) and associated storm drain ditch (Parcel 3.9); former pistol range near Hole 9 (Parcel 3.10); former flamethrower test site west of Hole 9 (Parcel 3.11); storm drain ditch adjacent to Gate 9 (Parcel 29.3); spill area between Buildings 489 and 490 (Parcel 20.6); spill area east of Building 685 (Parcel 22.2); spill area between Buildings 925 and 949 (Parcel 30.2); former waste material storage area west of Buildings 308 and 309 (Parcel 15.5); former material recoupment area at southeast corner of Building 873 (Parcel 24.1); open land area surrounding Buildings 873 and 875 (Parcel 25.2); and former spray paint area south of Building 949 (Parcel 30.5).

In the past, all grassed areas (Parcels 3.5, 3.10, 3.11, 13.5, 14.2, 15.6, 18.2, 20.5, 21.5, 23.6, 23.10, 23.11, 28.1, 28.2, 29.2, 33.9, 34.2 and 35.5) were sprayed with pesticides and herbicides. In the past, all gravel areas (15.5, 15.6, 19.1, 20.5, 21.5, 22.1, 22.2, 23.6, 23.10, 23.11, 24.1, 24.2, 25.2, 26.1, 27.1, 28.1, 28.2, 29.2, 30.3, 32.3, 33.7, 33.9, 35.2, 35.4 and 35.5) were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP). In the past, all gravel open storage areas (X01, X02, X03, X04, X05, X06, X07, X08, X09, X10,

X11, X12, X17, X19, X20, X21, X23, X27, X30, Y10 and Y50) were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP). In the past, all railroad tracks (Parcels 13.5, 14.2, 15.6, 18.2, 19.1, 20.5, 23.6, 24.2, 25.2, 26.1, 29.2, 30.3, 31.1, 33.9 and 34.2) were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP). Existing records do not support the determination that releases exceeded the 40 CFR Part 373 reportable quantities unless otherwise noted in Table 2. 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 substance activities occurred is provided in Table 2 – Notification of Hazardous Substance Storage, Release or Disposal (Enclosure 3).

Results from the Preliminary Risk Evaluation (PRE) (CH2M Hill, April 1998) indicated industrial reuse scenario carcinogenic risks were within or below (i.e., even less risk) the acceptable exposure level [(40 CFR 300.430 (e)(2)(i)(A)(2))] as defined by the Environmental Protection Agency for the following parcels included in this FOSL: 13.5, 14.2, 15.2, 15.3, 15.4, 15.5, 15.6, 18.2, 19.1, 19.2, 19.3, 20.1, 20.5, 20.6, 21.5, 22.1, 22.2, 23.6, 23.7, 23.8, 23.9, 23.10, 23.11, 24.1, 24.2, 25.1, 25.2, 26.1, 26.2, 27.1, 28.1, 28.2, 29.2, 29.3, 30.2, 30.3, 30.4, 30.5, 31.1, 32.3, 33.6, 33.7, 33.8, 33.9, 34.2, 35.1, 35.2, 35.3, 35.4 and 35.5. Risk assessment information for the Parcel 3 is contained in subsequent paragraphs of this FOSL.

Results from the PRE (CH2M Hill, April 1998) indicated industrial reuse scenario non-carcinogenic risks were within or below (i.e., even less risk) the acceptable exposure level [(40 CFR 300.430 (e)(2)(i)(A)(1))] as defined by the Environmental Protection Agency for the following parcels included in this FOSL: 13.5, 14.2, 15.2, 15.3, 15.5, 15.6, 18.2, 19.1, 19.2, 19.3, 20.1, 20.5, 20.6, 21.5, 22.1, 22.2, 23.6, 23.7, 23.8, 23.9, 23.10, 23.11, 24.1, 24.2, 25.1, 25.2, 26.1, 26.2, 27.1, 29.2, 30.2, 30.3, 30.4, 31.1, 32.3, 33.6, 33.7, 33.8, 33.9, 34.2, 35.1, 35.2, 35.3, 35.4 and 35.5.

Results from the PRE (CH2M Hill, April 1998) indicated Parcels 15.4, 28.1, 28.2, 29.3, 30.5 and 35.4 industrial reuse scenario non-carcinogenic risks were above the acceptable exposure level [(40 CFR 300.430 (e)(2)(i)(A)(1))] as defined by the Environmental Protection Agency. One sample for Parcel 15.4 taken adjacent to the remaining concrete pad from the demolition of Building 702 was above acceptable exposure levels and will be further evaluated under the installation restoration program. One sample for Parcel 28.1 was taken adjacent to a railroad track and was on the threshold of the acceptable exposure level. All railroad tracks will be further evaluated under the installation restoration program. Samples for Parcel 30.5 were collected adjacent to Screening Site 83 and will be further evaluated under the installation restoration program. Parcel 28.2 and 35.4 include Remedial Investigation Site 32 and Screening Sites 31, 33 and 89 all of which are included in a proposed removal action that, if approved, is anticipated to occur in 1999. Parcel 29.3 is a concrete lined stormwater drainage ditch at which no beneficial occupancy will occur. 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.

X11, X12, X17, X19, X20, X21, X23, X27, X30, Y10 and Y50) were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP). In the past, all railroad tracks (Parcels 13.5, 14.2, 15.6, 18.2, 19.1, 20.5, 23.6, 24.2, 25.2, 26.1, 29.2, 30.3, 31.1, 33.9 and 34.2) were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP). Existing records do not support the determination that releases exceeded the 40 CFR Part 373 reportable quantities unless otherwise noted in Table 2. 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 substance activities occurred is provided in Table 2 – Notification of Hazardous Substance Storage, Release or Disposal (Enclosure 3).

Results from the Preliminary Risk Evaluation (PRE) (CH2M Hill, April 1998) indicated industrial reuse scenario carcinogenic risks were within or below (i.e., even less risk) the acceptable exposure level [(40 CFR 300.430 (e)(2)(i)(A)(2))] as defined by the Environmental Protection Agency for the following parcels included in this FOSL: 13.5, 14.2, 15.2, 15.3, 15.4, 15.5, 15.6, 18.2, 19.1, 19.2, 19.3, 20.1, 20.5, 20.6, 21.5, 22.1, 22.2, 23.6, 23.7, 23.8, 23.9, 23.10, 23.11, 24.1, 24.2, 25.1, 25.2, 26.1, 26.2, 27.1, 28.1, 28.2, 29.2, 29.3, 30.2, 30.3, 30.4, 30.5, 31.1, 32.3, 33.6, 33.7, 33.8, 33.9, 34.2, 35.1, 35.2, 35.3, 35.4 and 35.5. Risk assessment information for the Parcel 3 is contained in subsequent paragraphs of this FOSL.

Results from the PRE (CH2M Hill, April 1998) indicated industrial reuse scenario non-carcinogenic risks were within or below (i.e., even less risk) the acceptable exposure level [(40 CFR 300.430 (e)(2)(i)(A)(1))] as defined by the Environmental Protection Agency for the following parcels included in this FOSL: 13.5, 14.2, 15.2, 15.3, 15.5, 15.6, 18.2, 19.1, 19.2, 19.3, 20.1, 20.5, 20.6, 21.5, 22.1, 22.2, 23.6, 23.7, 23.8, 23.9, 23.10, 23.11, 24.1, 24.2, 25.1, 25.2, 26.1, 26.2, 27.1, 29.2, 30.2, 30.3, 30.4, 31.1, 32.3, 33.6, 33.7, 33.8, 33.9, 34.2, 35.1, 35.2, 35.3, 35.4 and 35.5.

Results from the PRE (CH2M Hill, April 1998) indicated Parcels 15.4, 28.1, 28.2, 29.3, 30.5 and 35.4 industrial reuse scenario non-carcinogenic risks were above the acceptable exposure level [(40 CFR 300.430 (e)(2)(i)(A)(1))] as defined by the Environmental Protection Agency. One sample for Parcel 15.4 taken adjacent to the remaining concrete pad from the demolition of Building 702 was above acceptable exposure levels and will be further evaluated under the installation restoration program. One sample for Parcel 28.1 was taken adjacent to a railroad track and was on the threshold of the acceptable exposure level. All railroad tracks will be further evaluated under the installation restoration program. Samples for Parcel 30.5 were collected adjacent to Screening Site 83 and will be further evaluated under the installation restoration program. Parcel 28.2 and 35.4 include Remedial Investigation Site 32 and Screening Sites 31, 33 and 89 all of which are included in a proposed removal action that, if approved, is anticipated to occur in 1999. Parcel 29.3 is a concrete lined stormwater drainage ditch at which no beneficial occupancy will occur. 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.

In an effort to evaluate health risks associated with the historical use of pesticides at the recreational area of the Depot, which includes parcels 3.5, 3.6, 3.7, 3.8, 3.9, 3.10 and 3.11, the BRAC Cleanup Team had a streamlined risk assessment conducted. Results of this assessment are contained in the Final Streamlined Risk Assessment Parcel 3 Technical Memorandum (CH2M Hill, January 1999). The assessment is unique in that it has been expedited when compared to the typical "Superfund" process. From late 1996 through 1998, over fifty surface soil samples from throughout these parcels were collected, analyzed, and the results processed through several risk assessment scenarios reflected of intended, like reuse of the recreational area. The assessment concluded that risks associated with pesticides on the softball field or the playground for small children or adolescence youths were below the acceptable exposure level [(40 CFR 300.430 (e)(2)(i)(A)(2))] as defined by the Environmental Protection Agency. The assessment also concluded that risks associated with pesticides on the golf course for golfers were within the acceptable exposure level [40 CFR 300.430 (e)(2)(i)(A)(2)] as defined by the Environmental Protection Agency. When compared with other golf courses, pesticide levels at the Depot were typical. Golf courses in the city of Memphis usually notify course users about the application of pesticides by posting signs and flyers. Therefore, the Lessee is required to comply with Environmental Protection Provision 20 (Enclosure 5) regarding the posting of signs regarding historical and current pesticide use.

Health risks associated with surface water, sediments and aquatic animals in Lake Danielson (Parcel 3.6) and the Golf Course Pond (Parcel 3.8) were also assessed in an expedited manner. Final results are included in the final Baseline Risk Assessment for Golf Course Impoundments at the Defense Distribution Depot Memphis, Tennessee (Radian International, May 1999). The surface water, sediments and aquatic animals from these two impoundments were sampled, analyzed, and evaluated to determine the risk associated with consumption of the fish and the frog legs. It is important to note that the only aquatic animals collected from either impoundment were frogs, goldfish and a forage fish known as a shiner (*Notropis girardi*). Many different sample collection techniques were utilized to collect aquatic animals including angling, trapping and electroshocking. Frogs, goldfish and shiners were the only species collected. In correspondence from a certified Piscivarian Wildlife Biologist from the Tennessee Valley Authority (TVA), the Lessee was advised that no appreciable/viable populations of game fish species were within either impoundment. The assessment indicated risks associated with consumption of non-game fish and frog legs from the impoundments were below the acceptable exposure level [40 CFR 300.430 (e)(2)(i)(A)(2)] as defined by the Environmental Protection Agency. The assessment also indicates risks posed by exposure to surface water and sediments through swimming in the impoundments were below the acceptable exposure level [40 CFR 300.430 (e)(2)(i)(A)(2)] as defined by the Environmental Protection Agency. In 1986 due to unsupervised swimming and proximity to golf course fairways as well as preliminary sampling results, fishing and swimming in both impoundments was banned and signs to this effect were posted. Further sampling and risk assessments efforts have determined that there is no health risk reason from substances in surface water, sediments or aquatic life in the impoundments for this ban to continue. However, the Lessee should maintain the signage around the impoundments as the Lessee may decide to continue the ban on fishing and swimming for safety reasons.

### 3.3 Petroleum and Petroleum Products

#### 3.3.1 Storage, Release, or Disposal of Petroleum Products

Petroleum products were stored in excess of 55 gallons at following locations: Buildings 209 (Parcel 14.2/demolished in 1998), 465, 469, 865, 873, 875, 970, 1085 (in Parcel 35.2/demolished in 1988), 1090 and 1091; open storage areas X03, X07, X10, X11, X12, X17, X19, X20, X21, X23 and Y10; former waste material storage area west of Buildings 308 and 309 (Parcel 15.5); former material recoupment area at southeast corner of Building 873 (Parcel 24.1); former aboveground storage tank (Tank 765) east of Building 770 (Parcel 33.7); in Parcel 13.5 at the current aboveground storage tank for the emergency generator associated with Building 211; in Parcel 15.6 at a former underground storage tank adjacent to Building 319; in Parcel 33.9 at a former aboveground storage tank (Tank 721) adjacent to Building 720 and at a former underground storage tank adjacent to Building 754 (Building 754 is Parcel 33.2 and is not included in this FOSL). Small quantities of petroleum products were stored and used at former Building 702 (Parcel 15.4/demolished in 1998), the officer's hobby shop. See Section 3.3.2 for more information regarding underground and aboveground storage tanks.

There is evidence that petroleum or petroleum products were released at the following locations: inside Buildings 465, 468, 469, 863, 873 and 970; at open storage areas X03, X11, X27 and X30; the spill area on north dock of Building 489 (Parcel 20.1); spill area northwest of Building 995 (Parcel 23.9); spill area west of Building 737 (Parcel 33.6); former flamethrower test site west of Hole 9 (Parcel 3.11); open land area surrounding Buildings 689 and 690 (Parcel 21.5); in open storage area X03 between Buildings 771 and 873 (Parcel 24.2); open land area surrounding Buildings 873 and 875 (Parcel 25.2); open land area surrounding Building 972 (Parcel 27.1).

In the past, all gravel areas (15.5, 15.6, 19.1, 20.5, 21.5, 22.1, 22.2, 23.6, 23.10, 23.11, 24.1, 24.2, 25.2, 26.1, 27.1, 28.1, 28.2, 29.2, 30.3, 32.3, 33.7, 33.9, 35.2, 35.4 and 35.5) were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP). In the past, all gravel open storage areas (X01, X02, X03, X04, X05, X06, X07, X08, X09, X10, X11, X12, X17, X19, X20, X21, X23, X27, X30, Y10 and Y50) were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP). In the past, all railroad tracks (Parcels 13.5, 14.2, 15.6, 18.2, 19.1, 20.5, 23.6, 24.2, 25.2, 26.1, 29.2, 30.3, 31.1, 33.9 and 34.2) were historically sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP).

It is assumed, unless otherwise noted in Table 3 and with the exception of the waste oil sprayed on gravel areas and railroad tracks, that 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 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 petroleum product activities occurred is provided in Table 3 – Notification of Petroleum Product Storage, Release or Disposal (Enclosure 4).

### 3.3.2 Underground and Aboveground Storage Tanks (UST/AST)

There were eight underground storage tanks (UST) and two aboveground storage tanks (AST) on the property that were used for storage of petroleum products. There is no evidence of release or disposal at the following UST/AST sites: In Parcel 14.2 on north side of Building 209: 12,000-gallon heating oil UST removed in July 1994, 500-gallon heating oil UST removed in July 1995, and 500-gallon boiler blow down UST removed in July 1995. In Parcel 13.5 west of Building 211: 500-gallon diesel fuel AST that remains active. In Parcel 15.6 north of Building 319: 4,000-gallon heating oil UST removed in July 1994. In Parcel 33.9 west of Building 720: 12,000-gallon AST removed in July 1997. In Parcel 33.9 on east side of Building 754: 200-gallon gasoline UST removed in 1986. In Parcel 25.2 on east side of Building 875: 1,000-gallon heating oil UST closed in place in 1994. In Parcel 35.2 on east side of former Building 1085 that was demolished by 1988: 1,000-gallon waste oil UST removed in 1988 and 100-gallon hydraulic fluid UST closed in place in 1995. A summary of the buildings or areas in which petroleum product activities occurred is provided in Table 3 – Notification of Petroleum Product 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 has been no evidence of release from this equipment. There is evidence that PCBs or PCB contaminated fluids were released from PCB-containing equipment, that has since been removed, at Building 469.

On December 16, 1993, approximately 4 to 6 ounces of PCB (PCB-1242) contaminated fluid was spilled on a small portion of the southern interior wall and floor (2 square feet on wall and 2 square feet on floor) of Building 469. The Spill Team responded, applied absorbent and disposed of all residue in accordance with federal, state and local regulations. The sheet rock wall and concrete floor absorbed some of the fluid. According to the Spill Team Leader, the effected sheet rock and concrete floor were removed during sampling efforts. The BRAC Cleanup Team performed a visual inspection and identified no remaining contamination and determined no further action was required to address the spill. There is no risk to human health and the environment. The lease will include the PCB notification provision in the Environmental Protection Provisions (Enclosure 5)

### 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 308:	Roof flashing: non-friable
Building 309:	Roof flashing: non-friable Asphalt built-up roof: non-friable Cement asbestos wall panels: assessment does not indicate friability, indicates poor condition/heavy damage



Building 319:	Asphalt built-up roof: non-friable
Building 398:	Dry wall leveling compound: non-friable
Building T416:	Cement asbestos siding shingles: non-friable Interior window frame putty: non-friable Exterior door frame putty: non-friable
Building T417:	Cement asbestos siding shingles: non-friable Exterior window and door frame putty: non-friable
Building 717:	Window and door frame putty: non-friable
Building 720:	12 x 12 brown vinyl floor tile and mastic: non-friable Exterior window and door putty: non-friable Asphalt built-up roofing: non-friable Roof flashing: non-friable
Building 737:	Cement asbestos shingle siding/exterior gables: non-friable
Building 783:	Mastic crack sealant: non-friable
Building 801:	Exterior window and door frame putty: non-friable
Building 873:	Asphalt built-up roofing: non-friable Roof flashing: non-friable
Building 875:	Cement asbestos wall board/breakroom heater: non-friable Cement asbestos shingles/Bay 4 office exterior: non-friable Restroom floor tile mastic: non-friable Thermal system pipe insulation: non-friable 12 x 12 brown floor tile and mastic in office: non-friable Boiler room pipe insulation: non-friable Boiler room pipe joint insulation: non-friable Boiler room tank insulation: non-friable Asphalt built-up roofing: non-friable Roof flashing: non-friable
Building 1084:	Roof flashing: non-friable
Building 1087:	Thermal system duct insulation/paint booth: non-friable
Building 1090:	Mastic/sealant coating roof bolts: non-friable
Building 1091:	Mastic/sealant coating roof bolts: non-friable

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: 194, 197, 301, 308, 309, 319, 398, T416, T417, 465, 468, 469, 717, 720, 783, 793, 801, 802, 863, 865, 873, 875, 970, 1084, 1086, 1087, 1088, 1089, 1090 and 1091. The lease will include the lead-based paint warning and covenant provided in the Environmental Protection Provisions (Enclosure 5).

### **3.7 Radiological Materials**

The following buildings were used for radiological activities:

- Building 319, Bay 6 - storage of lantern mantles containing thorium-232; smoke detectors containing americium 241; electron tubes containing thorium-232, tritium (H-3) and radium-226; wrist watches containing tritium (H-3) and radium-226; indicator and toggle switches containing radium-226; and compasses containing tritium (H-3).

A radiological field survey was conducted in 1996 at those sites having radiological activities. The survey indicated Building 319 had several wall surfaces with alpha radiation above the alpha background radiation level and recommended additional characterization be performed to determine the cause of the slightly elevated alpha radiation before being released for unrestricted use. The characterization study was completed in April 1997 and concluded that the higher levels of alpha radiation resulted from naturally occurring radioactivity in the pre-cast concrete building materials. The characterization study concluded that Building 319 could be released for unrestricted use. In a letter dated April 16, 1999, the NRC approved the Defense Distribution Center's request to amend the Depot's license and released Building 319 for unrestricted use.

### **3.8 Radon**

In accordance with the Department of Defense Memorandum, Subject: Asbestos, Lead Paint and Radon Policies at BRAC Properties, dated October 31, 1994, no radon surveys were conducted in the buildings included in this FOGL as their intended use will not be residential.

### **3.9 Unexploded Ordnance**

Based on a review of existing records and available information, none of the buildings or 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 the Depot on the National Priorities List (NPL) for environmental restoration. The Depot 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 persons leasing it. In addition, environmental conditions on adjacent federal government 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. The EPA has concurred that the areas and buildings included in this Finding of Suitability to Lease are suitable to lease provided that the property uses are consistent with the Depot Redevelopment Plan and that the lessee strictly adheres to 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 this FOSL. EPA and TDEC were provided copies of the draft for review and comment. EPA, DLA and the Department of Army have provided comments. All comments and responses are located at 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**

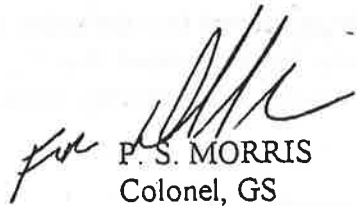
On the basis of the above results from the site-specific EBS and other environmental studies and in consideration of the intended use of the property, certain terms and conditions are required for the proposed lease. These terms and conditions are set forth in the attached Environmental Protection Provisions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

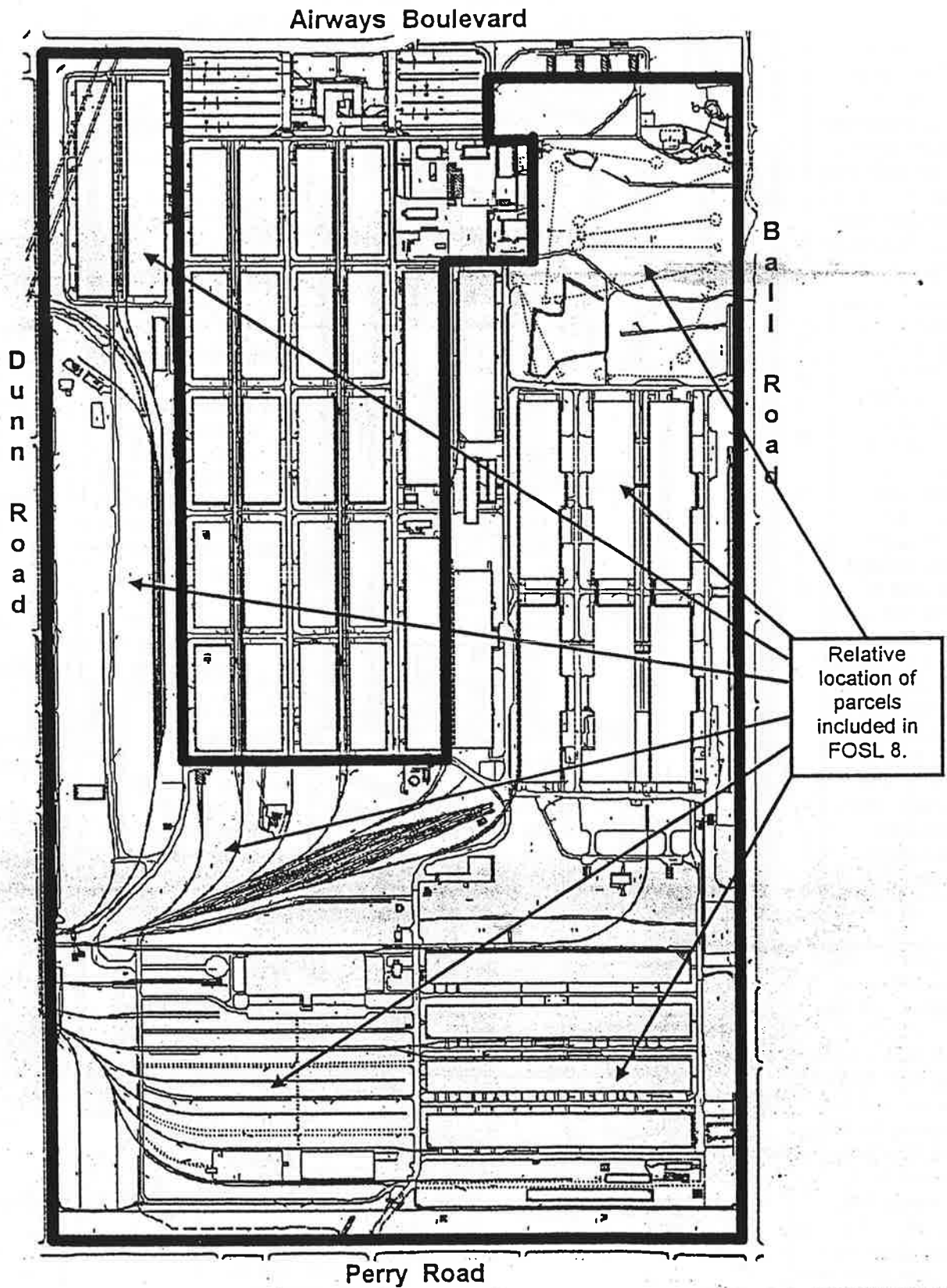
As required under the DOD FOSL Guidance, notification of hazardous substance activities and petroleum product activities shall be provided in the lease documents. Refer to Table 2 – Notification of Hazardous Substance Storage, Release or Disposal (Enclosure 3) and Table 3 – Notification of Petroleum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

  
P. S. MORRIS  
Colonel, GS  
Deputy Chief of Staff  
for Engineering,  
Housing, Environment  
and Installation Logistics

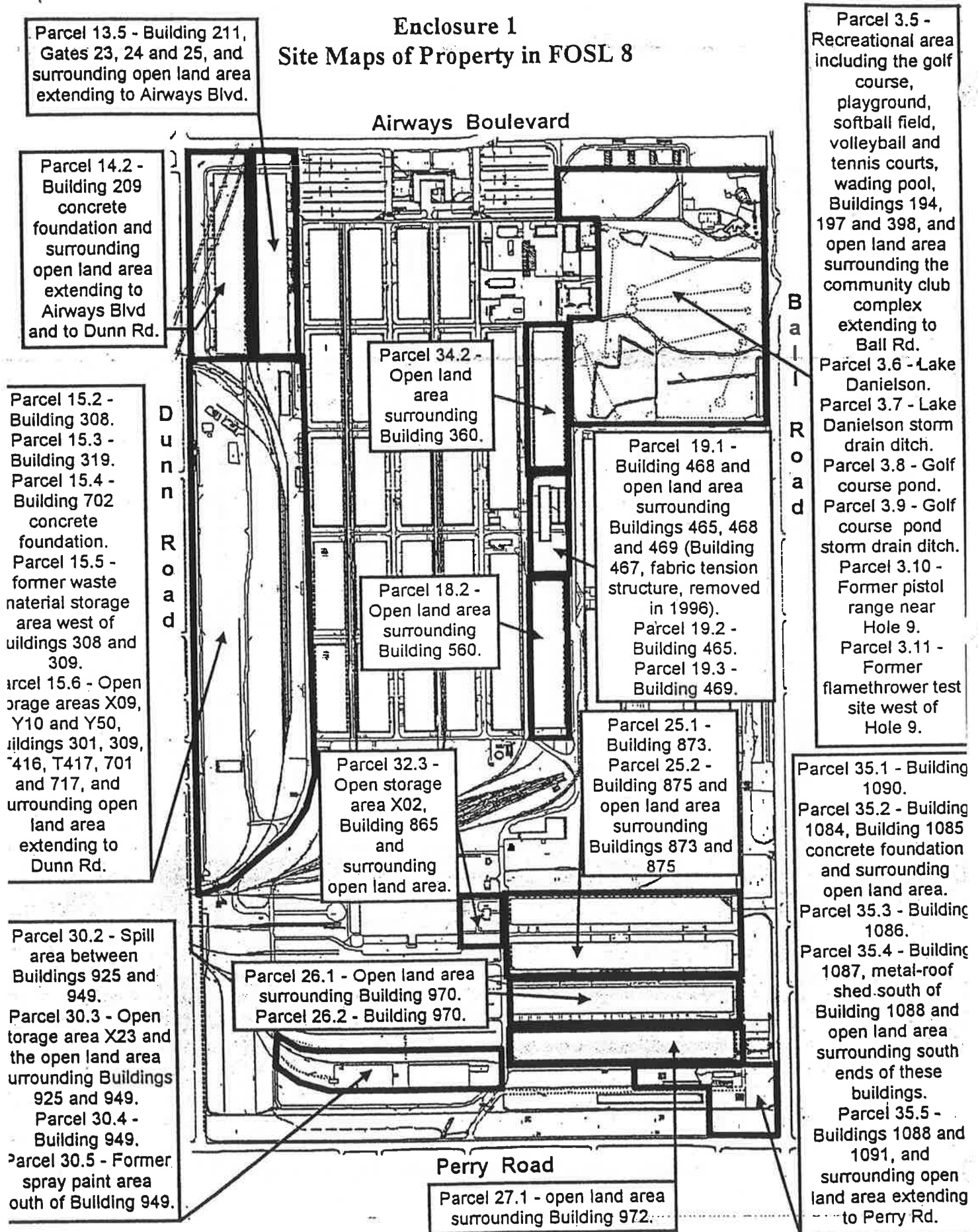
7 Enclosures

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

Enclosure 1  
Site Maps of Property in FO SL 8

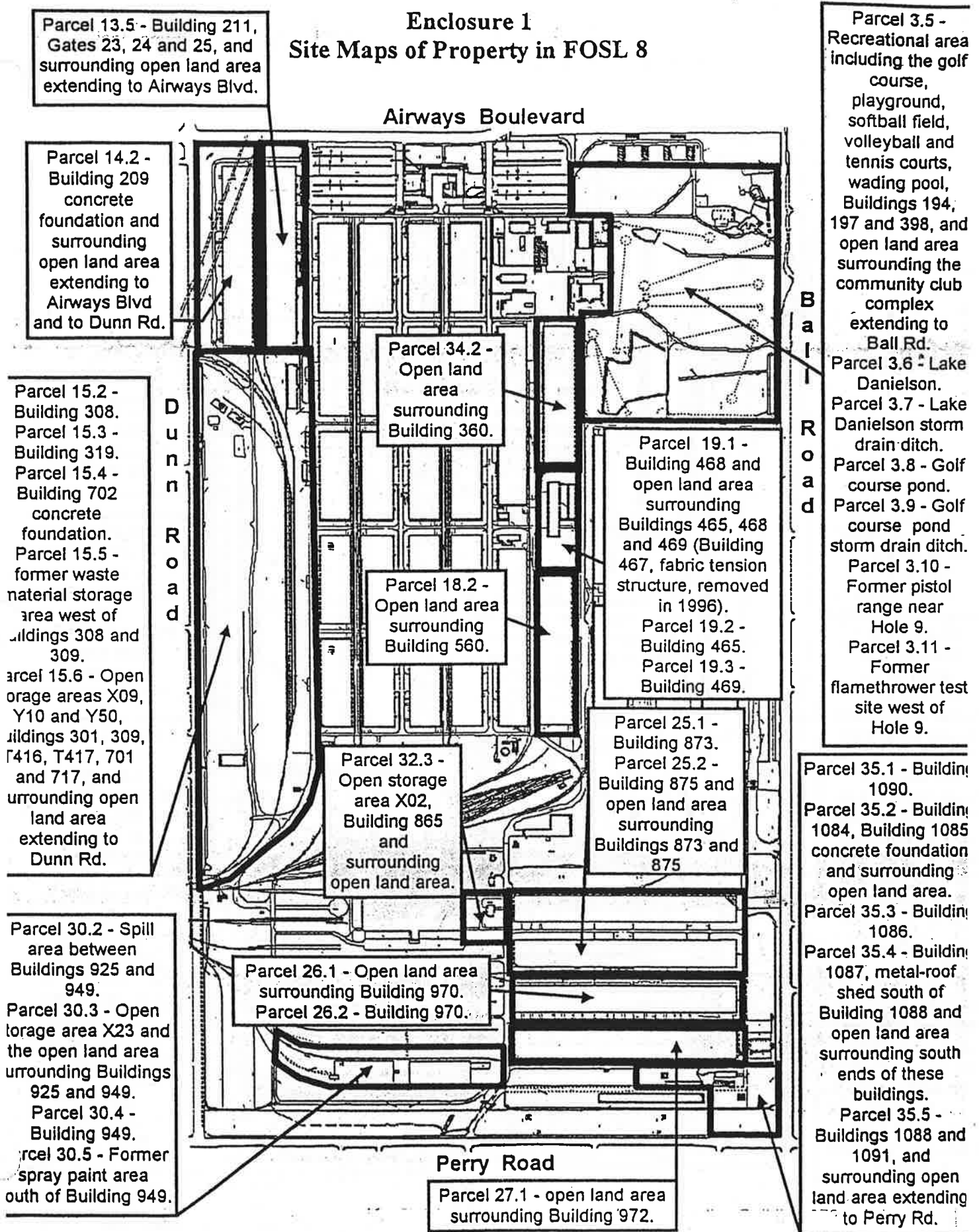


# Enclosure 1 Site Maps of Property in FOSL 8



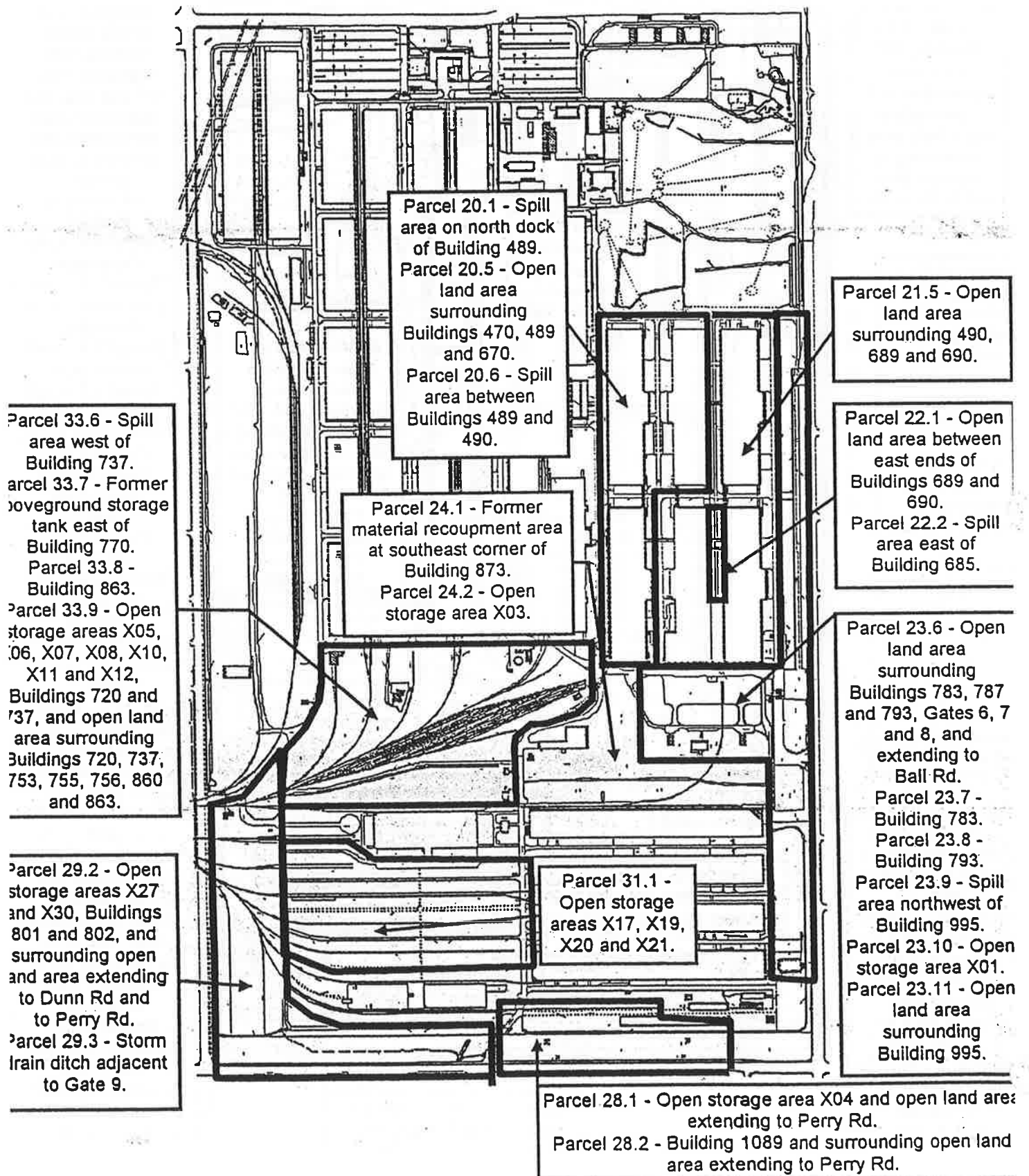


# Enclosure 1 Site Maps of Property in FOSL 8



# Enclosure 1

## Site Maps of Property in FOSL 8





**Enclosure 2**  
**Table 1 - Description of Property**

Building Number and Property Description	Parcel Designation	Condition Category	Remedial Actions
Parcel 30.4 - Building 949, a 60,000-sq. ft. fabric tension structure erected in 1987 and used as a general purpose warehouse	30.4(1)	1	Building 949 may have been fumigated in the past. The BCT evaluated this fumigation issue and determined no further action was required. <sup>2</sup> 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.
Parcel 20.1 - Spill area on the north dock of Building 489	20.1(2)	2	A 1-gallon oil spill was reported on November 3, 1995 at the north dock of Building 489, Section 4. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. The November 1996-Environmental Baseline Survey placed this parcel in ECP Category 3. In 1997 the ECP category definitions changed so that Category 3 was no longer appropriate for petroleum product releases. In December 1998, the BCT agreed Category 3 was not appropriate, as the release involved a petroleum product, and agreed the parcel should change from an ECP Category 3 to a Category 2. 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.
Parcel 23.9 - Spill area northwest of Building 995	23.9(2)	2	A 10-gallon gasoline spill was reported on September 13, 1993, northwest of Building 995 on the paved road. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. In 1997, samples were collected from the spill area. Petroleum hydrocarbons were detected but were below the Tennessee clean-up level. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 3. In 1997 the ECP category definitions changed so that Category 3 was no longer appropriate for petroleum product releases. In December 1998, the BCT agreed Category 3 was not appropriate, as the release involved a petroleum product, and agreed the parcel should change from an ECP Category 3 to a Category 2. 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.
Parcel 26.2 - Building 970, a 276,000-sq. ft. building erected in 1942 and used as an open storage warehouse	26.2(2)	2	Building 970 contained an oil fired generator that had leaked oil onto the concrete foundation. This release consisted of only petroleum products. Absorbent was applied and the residue disposed in accordance with federal, state and local regulations. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 2. 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.

**Enclosure 2**  
**Table 1 - Description of Property**

Parcel 33.6 - Spill area west of Building 737	33.6(2)	2	A 50-gallon mineral oil (non-PCB/<1 ppm) spill was reported on November 9, 1995 outside of Building 737. The Spill Team responded, excavated contaminated material and disposed of the residue in accordance with federal, state and local regulations. The November 1996 Environmental Baseline Survey categorized this parcel as a Category 4. In 1997 the ECP category definitions changed so that Category 4 was no longer appropriate for petroleum product releases. In December 1998, the BCT agreed Category 4 was not appropriate, as the release involved a petroleum product, and agreed the parcel should change from an ECP Category 4 to a Category 2. 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.
Parcel 15.2 - Building 308, a 540-sq. ft. building erected in 1944 and used for short term (less than 90 days) waste material storage	15.2(3)	3	The Defense Reutilization and Marketing Organization used this building to store materials classified as hazardous waste (about 95% of materials were hazardous substances that had exceeded manufacturer's shelf life; about 5% were hazardous substance spill residue) before being shipped to a disposal facility. The Depot's Resource Conservation and Recovery Act hazardous waste storage permit allowed use of this building. This parcel is associated with Screening Site 35 (Building 308 - Hazardous Waste Storage). In 1997, samples were collected from around the building and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . Also, air sampling conducted in this building in December 1997 to assess the impact from storage of hazardous materials indicated no human health hazards. In June 1998, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 15.4 - Building 702 concrete foundation (building demolished in 1998), originally a 12,000-sq. ft. building erected in 1941 and used as the Military Officer's Hobby Shop	15.4(3)	3	Building 702 was demolished in February 1998. Originally, Building 702 served as the officer's hobby shop. According to interview with Depot personnel, hazardous substances and petroleum products were used and stored in the building. A portion of the building was reportedly used as a spray paint booth. This parcel is associated with Screening Site 79 (Fuels, Miscellaneous Liquids, Wood and Paper). In 1997, samples were collected outside of the building in Parcel 15.6 and results indicated one chromium <sup>4</sup> level above background. No other BCT screening criteria <sup>3</sup> were exceeded, but levels of metals, dieldrin and PAHs were detected in the soil in Parcel 15.6 and will be further evaluated. In February 1999, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. The performance of

**Enclosure 2**  
**Table 1 - Description of Property**

			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.
Parcel 18.2 - Open land area surrounding Building 560	18.2(3)	3	This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. Samples taken from other railroad tracks will be used to determine appropriate actions for railroad tracks sitewide. A sample was collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In September 1997 the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 19.1 - Building 468, a 9,600-sq. ft. building erected in 1960 and used for vehicle/equipment and waste oil storage, and open land area surrounding Buildings 465, 468 and 469 (Building 467, a 24,883-sq. ft. fabric tension structure erected on this parcel in 1987, removed in 1996 and used for general storage)	19.1(3)	3	Building 468 was used to store facility maintenance vehicles and equipment. This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. Samples taken from other railroad tracks will be used to determine appropriate actions for railroad tracks sitewide. This parcel also contains a 1,000-gallon oil/water separator connected to the vehicle wash located at Building 465. The separator was cleaned following Depot closure. No spills are documented for this parcel. No sampling has been conducted at this parcel. In February 1999, the BCT conducted a visual inspection of this parcel and agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 19.2 - Building 465, a 400-sq. ft. building erected in 1984 and used as a vehicle wash rack	19.2(3)	3	Chemical engine cleaners/degreasers may have been used or released in this building. This building contains a floor drain/sump connected to an oil/water separator, which is physically located in Parcel 19.1. No sampling has been conducted at this parcel. In February 1999, the BCT conducted a walk through of Building 465, determined that the sump had been cleaned upon facility closure and used since then only to wash grass cutting equipment. In May 1999, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 23.6 - Open land area surrounding Buildings 783, 787 and 793, Gates 6, 7 and 8, and extending to	23.6(3)	3	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides as well as railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with

**Enclosure 2**  
**Table 1 - Description of Property**

Ball Road			pesticides and herbicides. This parcel also contains the open land area surrounding Screening Site (SS) 82 (Flammable storage - Buildings 783 and 793). Samples were collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 23.7 - Building 783, a 2,146-sq. ft. building erected in 1942 and used during World War II as a storage warehouse for the Chemical Warfare Service until March 31, 1961; in subsequent years, it was used by a local ROTC unit for small round ammunition and explosive ordnance storage then by Installation Services for general supply storage	23.7(3)	3	Building 783 was used by the U.S. Army Chemical Warfare Service for storage of flammable materials including hexachlorethane smoke pots, burning-mixture chloracetophenone tear gas solution and phosphorus/ rubber-gasoline solution filled grenades. The U.S. Army Corps of Engineer - St. Louis District found no evidence of release or disposal at this building of chemical warfare material during research for preparation of the "Ordnance and Explosive Waste/Chemical Warfare Materials Archive Search Report for Memphis Defense Depot." This parcel is also associated with Screening Site 82 (Flammables in Buildings 783 and 793). In 1997, samples were collected from the grassy area adjacent to Building 783 and results indicated levels of arsenic, chromium, lead <sup>4</sup> and dieldrin that exceeded BCT screening criteria <sup>3</sup> . The Preliminary Risk Evaluation indicated that noncarcinogenic risks for industrial scenarios was below one in a million, but were above one in a million for residential scenario due to naturally occurring metals. Carcinogenic risks were above one in a million for both industrial and residential scenarios due to arsenic. In February 1997, the BCT conducted a visual inspection of this parcel and agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 23.8 - Building 793, a 1,067-sq. ft. building erected in 1942 and used during World War II as a storage warehouse for the Chemical Warfare Service until March 31, 1961; in subsequent years, it was used by a local ROTC unit for small round ammunition and explosive ordnance storage then by	23.8(3)	3	Building 793 was used by the U.S. Army Chemical Warfare Service for storage of flammable materials including hexachlorethane smoke pots, burning-mixture chloracetophenone tear gas solution and phosphorus/ rubber-gasoline solution filled grenades. The U.S. Army Corps of Engineer - St. Louis District found no evidence of release or disposal at this building of chemical warfare material during research for preparation of the "Ordnance and Explosive Waste/Chemical Warfare Materials Archive Search Report for Memphis Defense Depot." This parcel is also associated with Screening Site 82 (Flammables in Buildings 783 and 793). In 1997, samples were collected from the grassy area adjacent to Building 793 and results indicated levels of arsenic,

**Enclosure 2**  
**Table 1 - Description of Property**

Installation Services for general supply storage			chromium, lead <sup>4</sup> and dieldrin that exceeded BCT screening criteria <sup>3</sup> . The Preliminary Risk Evaluation indicated that noncarcinogenic risks for industrial scenarios was below one in a million, but were above one in a million for residential scenario due to naturally occurring metals. Carcinogenic risks were above one in a million for both industrial and residential scenarios due to arsenic. In February 1997, the BCT conducted a visual inspection of this parcel and agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 23.10 - Open storage area X01	23.10(3)	3	Open storage area X01 was a small lake when the Depot opened in 1942. This parcel contains an open storage area and a gravel area that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. Samples were collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In October 1997, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 28.1 - Open storage area X04 and open land area extending to Perry Road; X04 was used to store steel bar and sheet metal materials	28.1(3)	3	This parcel contains an open storage area and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were sprayed with herbicides and pesticides. According to Depot personnel, this area did not store hazardous substances. Samples were collected and results indicated aluminum and iron <sup>4</sup> in surface soil near the range of the BCT screening criteria <sup>3</sup> . The Preliminary Risk Evaluation indicated that noncarcinogenic risks were above one in a million due to aluminum and iron, but the concentrations of these constituents in surface soils did not pose significant health risks. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 33.8 - Building 863, a 1,500-sq. ft. building erected in 1943 and used to store material handling equipment (MHE), battery charging stations and to recharge MHE	33.8(3)	3	Building 863 contained a battery charging station. The 1996 EBS visual inspection of this building identified several oil stains on the concrete floor of this building. In January 1998, two surface soil samples were collected from a nearby stormwater drainage area to determine if any metals were released due to battery charging operations. Sample results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the

**Enclosure 2**  
**Table 1 - Description of Property**

batteries			BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 34.2 - Open land area surrounding Building 360	34.2(3)	3	This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and the result indicated chlordane at a level that exceeded the BCT screening criteria <sup>3</sup> . The Preliminary Risk Evaluation indicated carcinogenic and noncarcinogenic risks for both industrial and residential scenarios were less than one in a million. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 15.3 - Building 319, a 18,000-sq. ft. building erected in 1942 and used as a special purpose warehouse for medical items (including alcohols, cyanide, mercury thermometers and materials containing low-level radioactive materials) and then as a hazardous waste storage warehouse	15.3(4)	4	Building 319 was a storage facility for various hazardous substances including flammable and toxic materials (alcohols and cyanide) and is associated with Screening Site 74 (Flammables and Toxics - West End Building 319). Low-level radioactive materials were stored in the western bay (Bay 6) of Building 319. Beginning in 1994, the eastern end of Building 319 was used for temporary (less than 90 days) hazardous waste storage by the Defense Reutilization and Marketing Organization (DRMO) - most of the waste consisted of expired shelf-life materials. In addition, a xylene spill was reported on November 18, 1991, inside Building 319, Section 4. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. In 1997, soil samples were collected outside the building at entry ways and results indicated levels of naturally occurring metals that exceeded BCT screening criteria <sup>3</sup> , but are similar to background concentrations. Also, air sampling conducted in this building in December 1997 to assess the impact from storage of hazardous materials indicated no human health hazards. In 1997, approximately 8 feet of wall space within the western bay was remediated for low-level radioactive impacts. In a letter dated April 16, 1999, the Nuclear Regulatory Commission (NRC) amended the Depot's license and released the building for unrestricted use. In July 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 4 based on the cleanup of both the xylene spill and the low-level radioactivity. 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.

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Parcel 19.3 - Building 469, a 9,600-sq. ft. building erected in 1960 and used as a battery and material handling equipment maintenance shop	19.3(4)	4	Acids, parts cleaning fluids and petroleum products were stored and used in Building 469. This parcel is associated with No Further Action Sites 40 (Safety-Kleen Units) and 41 (Satellite Drum Accumulation Areas). A self-contained Safety-Kleen unit was used in Building 469. Building 469 was also a satellite drum accumulation area for waste petroleum products and sulfuric acid. There is no evidence of releases from the units or accumulation area. No sampling occurred at this parcel. On December 16, 1993, a transformer oil spill was reported at Building 469. Approximately 6 ounces of material was spilled on the south wall and floor near the entrance. The sheet rock wall and concrete floor absorbed some of the oil. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. Samples were collected from the absorbent and concrete and results indicated PCB-1242. According to the Spill Team Leader, the effected area was removed during sampling operations. In February 1999, the BCT conducted a visual inspection and was unable to locate the spill area. In May 1999, the BCT agreed that no further evidence of the spill remained, that a remedial action occurred, and that this parcel should change from an ECP Category 7 to a Category 4. 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.
Parcel 25.1 - Building 873, a 276,000-sq. ft. building erected in 1942 and used for storage of hazardous substances, petroleum, oils and lubricant (POL) materials	25.1(4)	4	This parcel is associated with Building 873 and Remedial Investigation (RI) Site 27 (Former Recoupment Area/Building S873). Building 873 is an open shed warehouse that stored hazardous substances such as chlorinated solvents, corrosives, petroleum products, oils and lubricants. The southern end of the building is RI Site 27 that was used as the hazardous substances and POL recoupment area (remove materials from damaged containers then repackage the materials). Recoupment activities were conducted until the current Recoup Building was constructed in 1987/1988. Several spills inside Building 873 were documented and included tetrachloroethylene, sulfuric acid, hydraulic fluid and descaling compound. The Spill Team responded, took the appropriate action and disposed of the residue in accordance with federal, state and local regulations. Samples were taken outside of the building and will be addressed in Parcel 25.2. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 4 based on the cleanup of the spills. 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.



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Parcel 30.2 - Spill area between Buildings 925 and 949	30.2(4)	4	<p>This parcel is associated with former open storage area X25 and No Further Action Site 53 (Flammable Materials Spill). Beginning in the 1940s, flammable solvents were stored in drums on a gravel open storage area, then within an earthen-bermed open storage area at the northern end of the X25 area followed by a concrete-bermed open storage area. In the 1980s a fabric tension structure was erected over the area. In 1988 the structure collapsed during heavy winds releasing approximately 327 gallons of flammable material (xylene, toluene, methyl ethyl ketone) that mixed with approximately 30,000 gallons of water within the bermed area. The Depot Spill Team and Memphis Fire Department Hazardous Materials Team responded to the spill, pumped all liquid within the berm into tankers for transport to a licensed disposal facility. The fabric tension structure was demolished and, in 1994, Building 925 was constructed in about the same location. In January 1998, two surface soil samples were collected, and results indicated no levels that exceeded BCT screening criteria<sup>3</sup>. In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 4. 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 and the environment.</p>
Parcel 24.1 - Former material recoupment area at southeast corner of Building 873	24.1(5)	5	<p>The gravel area east of Building 873 was used as a materials recoupment area (remove materials from damaged containers then repackage the materials) until operations were moved inside Building 873 in 1984/1985. The gravel area was also historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel is associated with Remedial Investigation Site 27 (Former Recoupment Area - Building 873). In 1985 soil impacted by spills during recoupment activities was removed. In 1997, samples were collected and results indicated elevated levels of vanadium<sup>4</sup> and PAHs, which will be addressed in a sitewide risk evaluation. The November 1996 Environmental Baseline Survey categorized this parcel as an ECP Category 5 since a removal action had occurred, but further action may be needed. 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.<sup>1</sup></p>



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Parcel 15.5 - Former waste material storage area west of Buildings 308 and 309	15.5(6)	6	<p>This parcel is associated with the following Screening Sites: 36 (DRMO Hazardous Waste Concrete Storage Pad), 37 (DRMO Hazardous Waste Gravel Storage Pad), 38 (DRMO Damaged/Empty Hazardous Materials Drum Storage Area), and 39 (DRMO Damaged/Empty Lubricant Container Area). The open storage area/gravel area was also historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997 samples were collected and results indicated levels of metals<sup>4</sup>, DDT, trichloroethene and 1,1,2,2-tetrachloroethane that exceeded BCT screening criteria<sup>3</sup>. This parcel has been selected for early removal. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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.<sup>1</sup></p>
Parcel 25.2 - Building 875, a 276,000-sq. ft. building erected in 1942 and used for storage of hazardous substances, petroleum, oils and lubricant (POL) materials, and open land area surrounding Buildings 873 and 875	25.2(6)	6	<p>Building 875 is an open shed warehouse that stored various materials including hazardous substances and petroleum products when Building 873 was full. Several spills were documented for the open land area outside Buildings 873 and 875 (40 gallons of tetrachloroethylene, 2 gallons of hydraulic fluid, 55 gallons of fog oil, 18 gallons of cleaning compound solvent, 55 gallons of lube oil, 25 gallons of lube oil, 55 gallons of diethylene glycol, 5 gallons of transmission fluid, 2 gallons of malathion and 2 quarts of oil/lubricant). The Spill Team responded, took the appropriate action, removed stained soil and disposed of the residue in accordance with federal, state and local regulations. This parcel also contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. A 1,000-gallon heating oil tank was closed in place in July 1994 outside Building 875. Samples were collected from around Buildings 873 and 875 and results indicated levels of PAHs that exceeded the BCT screening criteria<sup>3</sup>. A portion of Parcel 25.2 is an early removal candidate depending upon results of a risk assessment. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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.<sup>1</sup></p>

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Parcel 28.2 - Building 1089, a 39,600-sq. ft. building erected in 1960 and used for miscellaneous storage including paints, paint related products and acids, and surrounding open land area extending to Perry Road	28.2(6)	6	<p>This parcel is associated with Screening Site 89 (Acids - Building 1089). Building 1089 was used to store acids, paints and cleaning solvents. This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. In 1997 samples were collected and results indicated lead, arsenic and chromium<sup>4</sup> levels that exceeded BCT screening criteria<sup>3</sup>. Monitoring well 21 (MW-21) is also associated with this parcel.</p> <p>Groundwater samples taken from MW-21 detected VOCs and metals. These issues will be further defined during the current Main Installation Groundwater Investigation. In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area surrounding Building 1089 has been selected for a removal action. 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.<sup>1</sup></p>
Parcel 35.1 - Building 1090, a 840-sq. ft. building erected in 1952 and used for storage of paint and paint related substances	35.1(6)	6	<p>Hazardous substances stored in Building 1090 included paint, paint thinner, lubricating oil, P-19 preservation oil, and corrosion preservation compound. No evidence of release. In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area surrounding this building has been selected for early removal actions. 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.<sup>1</sup></p>
Parcel 35.2 - Building 1084, a 1,200-sq. ft. open shed erected in 1952 and used as for general and pesticide storage, Building 1085 concrete foundation, originally a vehicle grease rack removed by 1988, and the surrounding open land area	35.2(6)	6	<p>This parcel includes Early Removal Site 88 (Petroleum, Oils and Lubricants at Building 1085) which was a vehicle grease rack removed by 1988; Early Removal Site 29 (Former Underground Waste Oil Storage Tank) that was associated with Building 1085 and was removed in 1988, and Early Removal Site 87 (Pesticide/DDT Storage in Building 1084). This parcel also contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic, chromium, lead, cadmium<sup>4</sup>, dieldrin and petroleum that exceeded BCT screening criteria<sup>3</sup>. In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the this parcel has been selected for early removal actions. Appropriate health and</p>

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			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. <sup>1</sup>
Parcel 35.3 - Building 1086, a 9,760 sq. ft. building erected in 1959 and used for hazardous materials storage, care and preservation of steel materials and also contained a spray paint booth	35.3(6)	6	This parcel includes proposed No Further Action Site 30 (Building 1086, Spray Paint Booth). Building 1086 also contains a floor drain sump that is connected to the sanitary sewer. In 1997, a sample was collected from the sump and results indicated levels of antimony, cadmium, cooper, lead, nickel, zinc <sup>4</sup> and naphthalene that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as this parcel has been selected for early removal actions. 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. <sup>1</sup>
Parcel 35.4 - Building 1087, a 4,927 sq. ft. building erected in 1952 and used as a spray paint booth, a metal-roofed shed south of Building 1088 used to store drums of sandblast waste awaiting disposal and open land area surrounding the south ends of these buildings	35.4(6)	6	This parcel includes Screening Site 31 (Building 1087, Former Spray Paint Booth) and Screening Site 33 (Sandblasting Waste Drum Storage Area South of Building 1088). This parcel also includes gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of PAHs, methylene chloride, dieldrin, DDT, lead, chromium, cadmium, arsenic and antimony <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as this parcel has been selected for early removal actions. 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. <sup>1</sup>

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Parcel 35.5 - Building 1088, a 2,272-sq. ft. building erected in 1953 and used as the sandblasting facility, Building 1091, a 800-sq. ft. building erected in 1953 and used for paint and paint related material storage, and surrounding open land area extending to Perry Road	35.5(6)	6	This parcel is associated with Remedial Investigation Site 32 (Sandblasting Waste Accumulation Area). This parcel also contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were sprayed with herbicides and pesticides. Samples were collected and results associated with Site 32 indicated levels of chromium, lead, arsenic <sup>4</sup> and PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel has been selected for early removal. In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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. <sup>1</sup>
Parcel 3.5 - Recreational area including the golf course, playground, softball field, volleyball and tennis courts, wading pool, Buildings 194, 197 and 398 and open land area surrounding the community club complex extending to Ball Road	3.5(7)	7	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides. In 1997, samples were collected and results indicated dieldrin and arsenic <sup>4</sup> levels that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed this parcel should remain a Category 7 until completion of an innovative technology pilot test and a site-wide dieldrin evaluation and site specific arsenic evaluation. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.6 - Lake Danielson, a 3.4-acre lake	3.6(7)	7	Lake Danielson is located in the northwest corner of the golf course and receives stormwater runoff from the central portion of the Main Installation. Several different sampling events have occurred at this parcel with results indicating metals <sup>4</sup> , pesticides and PAHs <sup>5</sup> in surface soils surrounding the lake, in storm water entering the lake and in lake sediments that exceeded BCT screening criteria <sup>3</sup> . In 1997 and again in 1998, efforts were made to capture edible fish species for tissue sampling. To date, only inedible species have been found. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>

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Parcel 3.7 - Lake Danielson storm drain ditch	3.7(7)	7	Lake Danielson storm drain ditch receives stormwater flow from surrounding areas and intermittent flow from the lake. Several different sampling events have occurred at this parcel with results indicating levels of metals <sup>4</sup> , pesticides and PAHs <sup>5</sup> in surface soils surrounding the ditch, in storm water and in sediments under the current concrete ditch that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.8 - Golf course pond, a .23-acre pond	3.8(7)	7	The golf course pond receives surface water runoff from the golf course and southeast portion of the Main Installation. Several different sampling events have occurred at this parcel with results indicating levels metals <sup>4</sup> and pesticides in surface water and in sediments ditch that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.9 - Golf course pond storm drain ditch	3.9(7)	7	The golf course pond storm drain ditch receives stormwater flow from surrounding areas and intermittent flow from the pond. Several different sampling events have occurred at this parcel with results indicating levels of metals <sup>4</sup> , dieldrin and PAHs <sup>5</sup> in surface soils surrounding the ditch, metals <sup>4</sup> in surface water, and metals <sup>4</sup> and pesticides in sediments under the current concrete ditch that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.10 - Former pistol range near Hole 9	3.10(7)	7	In the late 1940s, this parcel was used as a pistol range. This parcel also contains grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and results indicated levels of

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			dieldrin and arsenic <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.11 - Former flamethrower test site west of Hole 9	3.11(7)	7	This parcel is associated with Screening Site 69 (Flamethrower Liquid Fuel Application). This area was used to test flamethrowers and fuel and to practice firefighting techniques after ignition of the fuel. This parcel also contains grassed areas that were historically sprayed with herbicides and pesticides. In 1997, samples were collected and results indicated levels of dieldrin and PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 13.5 - Building 211 and associated emergency generator, a 988 square foot building erected in 1988 and used for battery backup power for the computer room in Building 210, Gates 23, 24 and 25, and surrounding open land area extending to Airways Boulevard	13.5(7)	7	This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel also contains grassed areas that were historically sprayed with pesticides and herbicides. In 1997 samples were collected from the grassed area and results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 14.2 - Building 209 concrete foundation (building demolished in 1998), originally a 240,000-sq. ft. building erected in 1942 and used as a general purpose	14.2(7)	7	Building 209 was demolished in 1998. It was originally used as a general purpose warehouse with a small office area. This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel also contains grassed areas that were historically sprayed with pesticides and herbicides. Three underground storage tanks were

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warehouse/ administrative office, and surrounding open land area extending to Dunn Road and Airways Boulevard			associated with Building 209: a 500-gallon heating oil tank removed in July 1995, a 500-gallon boiler blow down tank removed in July 1995, and a 12,000-gallon heating oil tank removed in July 1994. No evidence of release from these tanks has been found. In 1997, samples were collected and results indicated dieldrin levels that exceeded BCT screening criteria <sup>3</sup> . Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 15.6 is Open storage areas X09, Y10 and Y50, Building 301 (the scale house), Building 309 (a 540-sq. ft. building erected in 1944 and used for office/general storage), Building T416 (a 2,600-sq. ft. building erected in 1943 and used for general storage), Building T417 (a 3,120-sq. ft. building erected in 1943 and used for general storage), Building 701 (the potable water pump house), and Building 717 (a 600-sq. ft. building erected in 1951 and used as a restroom and contained an ice maker, and surrounding open land area extending to Dunn Road	15.6(7)	7	This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. This parcel is associated with Screening Sites 54 (East Stormwater Runoff Canal) and 55 (North Stormwater Runoff Canal). A 4,000-gallon heating oil tank was removed in July 1994 from outside of Building 319. No evidence of release from this tank has been identified. Several spills were reported for this parcel and included dielectric fluid (non PCB), cleaning compound solvent, sulfuric acid, hydraulic fluid. The Spill Team responded to these spills, took the appropriate action and disposed of the residues in accordance with federal, state and local regulations. In 1997, samples were collected and results indicated levels of metals <sup>4</sup> , dieldrin, DDD, DDE, DDT and dioxins/furans in soils above BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 20.5 - Open land area surrounding Buildings 470, 489 and 670	20.5(7)	7	This parcel contains railroad track and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and results indicated levels of dieldrin that exceeded BCT screening criteria <sup>3</sup> . Results from soil samples taken at other railroad track locations

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			that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 22.2 - Spill area east of Building 685	22.2(7)	7	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel is also associated with Screening Site 77 (Unknown Wastes Near Buildings 689 and 690). Battery acid spilled during MHE battery charging procedures was washed out a nearby door onto the gravel area immediately east of Building 685. In 1997, samples were collected and results indicated levels of antimony, arsenic <sup>4</sup> , dieldrin and PAHs in surface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 23.11 - Open land area surrounding Building 995	23.11(7)	7	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, a sample was collected from Parcel 23.9, a spill area within Parcel 23.11. Results indicated lead <sup>4</sup> in subsurface soils that slightly exceeded (24.3 mg/kg vs. 24 mg/kg) BCT screening criteria <sup>3</sup> . The BCT has made no decision to change the ECP category for this parcel. 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. <sup>1</sup>
Parcel 24.2 - Open storage area X03	24.2(7)	7	This parcel was used for storage of flammable materials in 55-gallon drums until 1988. The area then became steel storage. This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated arsenic <sup>4</sup> , PAHs and PCP levels in surface soils and lead <sup>4</sup> in subsurface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this



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			parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 26.1 - Open land area surrounding Building 970	26.1(7)	7	This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . However, in October 1997 the BCT agreed that this parcel remain an ECP Category 7 until surface soils could be further evaluated. 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. <sup>1</sup>
Parcel 27.1 - Open land area surrounding Building 972	27.1(7)	7	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of chromium <sup>4</sup> , PAHs and chlorinated pesticides in surface soils and chromium and lead <sup>4</sup> in subsurface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997 the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>
Parcel 29.2 - Open storage areas X27 and X30, Building 801 (a 544-sq. ft. building erected in 1956 and used for general supply storage by Installation Services) and Building 802 (a 400-sq. ft. building erected in 1981 and used as a waiting shelter), and surrounding open land area extending to Dunn Road and to Perry Road	29.2(7)	7	This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. In 1997, samples were collected and results indicated levels of chromium <sup>4</sup> , dieldrin, DDT and methylene chloride in surface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997 the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>

**Enclosure 2**  
**Table 1 - Description of Property**

Parcel 29.3 - Storm drain ditch adjacent to Gate 9	29.3(7)	7	This parcel is associated with Screening Site 56 (Western Storm Drainage Canal). In 1997, samples were collected and results indicated levels of metals <sup>4</sup> in surface soil; lead <sup>4</sup> in subsurface soil; PAHs <sup>5</sup> , lead <sup>4</sup> , p,pN-DDD and p,pN-DDE in sediments under the concrete lined ditch that exceeded BCT screening criteria <sup>3</sup> . PAHs were detected in sediments at levels exceeding criteria, but below background values. This parcel requires further investigation. In September 1997, the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>
Parcel 30.3 - Open storage area X23 and open land area surrounding Buildings 925 and 949	30.3(7)	7	This parcel is associated with open storage area X23 and former open storage area X25 where drums of flammable materials were stored. Buildings 925 and 949 were constructed on former open storage area X25. This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. No sampling has occurred at this parcel; however, pesticides and PAHs have been detected near railroad tracks at several Depot locations and will be evaluated in an upcoming sitewide risk evaluation. In September 1997, the BCT agreed this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 30.5 - Former spray paint area south of Building 949	30.5(7)	7	This parcel is associated with Screening Site 83 (Dried Paint Disposal Area). According to interviews with Depot personnel, spray painting and sand blasting occurred at this location until the early 1980s. In 1997, samples were collected and results indicated levels of antimony, barium, beryllium, cadmium, chromium, iron, lead and zinc <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In September 1997, the BCT agreed this parcel should remain an ECP Category 7. 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. <sup>1</sup>

**Enclosure 2**  
**Table 1 - Description of Property**

Parcel 31.1 - Open storage areas X17, X19, X20 and X21	31.1(7)	7	This parcel contains railroad tracks and open storage areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of metals <sup>4</sup> , dieldrin, dibenz(ah)anthracene and PCBs that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 32.3 - Open storage area X02, Building 865, a 4,200-sq. ft. building erected in 1988 and used for recoupment (repackaging) of hazardous substances and petroleum products, and surrounding open land area	32.3(7)	7	This parcel is associated with Screening Site 28 (Building 865, the Recoup Area Building). Building 865 is a handling area used to transfer hazardous substances/wastes or petroleum products/wastes from damaged or leaking containers into undamaged containers. This parcel also includes an open storage area and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic and lead <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 33.7 - Former aboveground storage tank east of Building 770	33.7(7)	7	This parcel is associated with Screening Site 81 (Fuel Oil Building 765), a 12,000-gallon diesel fuel aboveground storage tank that was removed in 1994. This parcel also contains a gravel area that was historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>

**Enclosure 2**  
**Table 1 - Description of Property**

<p>Parcel 33.9 - Open storage areas X05, X06, X07, X08, X10, X11 and X12, Building 720 (a 4,665-sq. ft. building erected in 1942 and used as a railroad engine repair facility and a diesel fueling station), Building 737 (a 5,744-sq. ft. building erected in 1961 and used to store and mix pest and weed control materials), and open land area surrounding Buildings 720, 737, 753, 755, 756, 860 and 863</p>	<p>33.9(7)</p>	<p>7</p>	<p>This parcel is associated with Screening Site 42 (Former Pentachlorophenol (PCP) Dip Vat Area), Screening Site 43 (Former Underground PCP Tank Area), Screening Site 46 (Pallet Drying Area) and Screening Site 80 (Fuel and Cleaner Dispensing at Building 720). In 1985, the PCP dip vat, underground storage tank, associated piping and impacted soil were removed. According to interviews with Depot personnel, cleaners were not dispensed from Building 720; parts cleaning solutions were used in the building. No evidence was found of a 1,000-gallon waste oil tank inside Building 720. This parcel contains railroad tracks, open storage areas and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. This parcel also contained a 12,000-gallon diesel aboveground storage tank west of Building 720 that was removed in 1997 and a 200-gallon gasoline underground storage tank adjacent to Building 754 that was removed in 1986. Hazardous substances and petroleum products were historically stored in open storage areas X05, X06, X07, X08, X10, X11 and X12. Transformers containing mineral oil (non-PCB and PCB-containing) were also stored in open storage area X07. Leaking 55-gallon drums of ethyl acetate/naphtha aromatic were reported to the Spill team, which responded, took the appropriate actions and disposed of all residue in accordance with federal, state and local regulations. In 1997, samples were collected and results indicated levels of lead, chromium, arsenic<sup>1</sup>, PAHs, dieldrin and PCB-1260 that exceeded BCT screening criteria<sup>3</sup>. This parcel requires further investigation. In February 1999, the BCT agreed that this parcel should remain an ECP Category 7. 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.<sup>1</sup></p>
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<sup>1</sup> 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.

<sup>2</sup> Records indicate that many buildings that stored perishables or textiles during the Depot's history may have been fumigated to control pests. Also, buildings that stored hazardous materials may have residual impacts from releases. The BCT determined that a representative number of buildings should be sampled for hazardous substances in the air. The BCT reviewed these air sampling results at the December 1997 BCT meeting and determined that no further action was warranted or required.

## Enclosure 2

### Table 1 - Description of Property

<sup>3</sup> BCT screening criteria were established by the BCT during the August 1997 BCT meeting and basically consist of the EPA Region III Risk Based Concentration table and, for some metals, regional background levels.

<sup>4</sup> Certain substances such as arsenic, chromium, cadmium, antimony and lead occur naturally. Even though analytical results indicated these levels exceeded BCT screening criteria, these levels appear fairly consistently across the Depot and are being regarded as naturally occurring.

<sup>5</sup> Polycyclic aromatic hydrocarbons (PAHs) may also be the result of vehicle traffic. PAHs result when substances such as wood, gasoline and oils burn. Even though analytical results indicated PAHs that exceeded BCT screening criteria, these levels are being regarded as originating from vehicle traffic on nearby streets.

**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
Parcel 3.5 - recreational area including the golf course, playground, softball field, volleyball and tennis courts, wading pool, Buildings 194, 197 and 398 and open land area surrounding the community club complex	Pesticides (dieldrin) Herbicides Chlorine Battery acid	Exact start date unknown assumed facility activation in 1942	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides. In 1997, samples were collected and results indicated dieldrin and arsenic <sup>4</sup> levels that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed this parcel should remain a Category 7 until completion of an innovative technology pilot test and a sitewide dieldrin evaluation and site specific arsenic evaluation. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.6 - Lake Danielson, a 3.4-acre lake	Pesticides (dieldrin) Herbicides	Exact start date unknown assumed facility activation in 1942	Lake Danielson is located in the northwest corner of the golf course and receives stormwater runoff from the central portion of the Main Installation. Several different sampling events have occurred at this parcel with results indicating metals <sup>4</sup> , pesticides and PAHs <sup>5</sup> in surface soils surrounding the lake, in storm water entering the lake and in lake sediments that exceeded BCT screening criteria <sup>3</sup> . In 1997 and again in 1998, efforts were made to capture edible fish species for tissue sampling. To date, only inedible species have been found. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.7 - Lake Danielson storm drain ditch	Pesticides (dieldrin) Herbicides	Exact start date unknown assumed facility activation in 1942	Lake Danielson storm drain ditch receives stormwater flow from surrounding areas and intermittent flow from the lake. Several different sampling events have occurred at this parcel with results indicating levels of metals <sup>4</sup> , pesticides and PAHs <sup>5</sup> in surface soils surrounding the ditch, in storm water and in sediments under the current concrete ditch that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities

### Enclosure 3

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

			at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.8 - Golf course pond, a .23- acre pond	Pesticides (dieldrin) Herbicides	Exact start date unknown assumed facility activation in 1942	The golf course pond receives surface water runoff from the golf course and southeast portion of the Main Installation. Several different sampling events have occurred at this parcel with results indicating levels of metals <sup>4</sup> and pesticides in surface water and in sediments ditch that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.9 - Golf course pond storm drain ditch	Pesticides (dieldrin) Herbicides	Exact start date unknown assumed facility activation in 1942	The golf course pond storm drain ditch receives stormwater flow from surrounding areas and intermittent flow from the pond. Several different sampling events have occurred at this parcel with results indicating levels of metals <sup>4</sup> , dieldrin and PAHs <sup>5</sup> in surface soils surrounding the ditch, metals <sup>4</sup> in surface water, and metals <sup>4</sup> and pesticides in sediments under the current concrete ditch that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 3.10 - Former pistol range near Hole 9	Pesticides (dieldrin) Herbicides	Exact start date unknown assumed facility activation in 1942	In the late 1940s, this parcel was used as a pistol range. This parcel also contains grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and results indicated levels of dieldrin and arsenic <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>



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

Parcel 3.11 - Former flamethrower test site west of Hole 9	Pesticides (dieldrin) Herbicides Diesel fuel Kerosene PAHs	Exact start date unknown assumed facility activation in 1942	This parcel is associated with Screening Site 69 (Flamethrower Liquid Fuel Application). This area was used to test flamethrowers and fuel and to practice firefighting techniques after ignition of the fuel. This parcel also contains grassed areas that were historically sprayed with herbicides and pesticides. In 1997, samples were collected and results indicated levels of dieldrin and PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 13.5 - Building 211 and associated emergency generator, Gates 23, 24 and 25, and surrounding open land area extending to Airways Blvd	Pesticides (dieldrin) Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel also contains grassed areas that were historically sprayed with pesticides and herbicides. In 1997 samples were collected from the grassed area and results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 14.2 - Building 209 concrete foundation (building demolished in 1998) and surrounding open land area extending to Airways Blvd	Pesticides (dieldrin) Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	Building 209 was demolished in 1998. It was originally used as a general purpose warehouse with a small office area. This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel also contains grassed areas that were historically sprayed with pesticides and herbicides. Three underground storage tanks were associated with Building 209: a 500-gallon heating oil tank removed in July 1995, a 500-gallon boiler blow down tank removed in July 1995, and a 12,000-gallon heating oil tank removed in July 1994. No evidence of release from these tanks has been found. In 1997, samples were collected and results

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

			<p>indicated dieldrin levels that exceeded BCT screening criteria<sup>3</sup>. Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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.<sup>1</sup></p>
Parcel 15.2 - Building 308	<p>Flammables Corrosives Toxics Oxidizers Batteries</p>	<p>Exact start date unknown assumed building construction date in 1944 - 1994</p>	<p>The Defense Reutilization and Marketing Organization used this building to store materials classified as hazardous waste (about 95% of materials were hazardous substances that had exceeded manufacturer's shelf life; about 5% were hazardous substance spill residue) before being shipped to a disposal facility. The Depot's Resource Conservation and Recovery Act hazardous waste storage permit allowed use of this building. This parcel is associated with Screening Site 35 (Building 308 - Hazardous Waste Storage). In 1997, samples were collected from around the building and results indicated no levels that exceeded the BCT screening criteria<sup>3</sup>. Also, air sampling conducted in this building in December 1997 to assess the impact from storage of hazardous materials indicated no human health hazards. In June 1998, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.</p>
Parcel 15.3 - Building 319	<p>Flammables Corrosives Toxics Oxidizers Radioactives Petroleum Products</p> <p>Spill: Xylene</p>	<p>Exact start date unknown assumed building construction in 1942</p> <p>Spill date: Nov. 18, 1991</p>	<p>Building 319 was a storage facility for various hazardous substances including flammable and toxic materials (alcohols and cyanide) and is associated with Screening Site 74 (Flammables and Toxics - West End Building 319). Low-level radioactive materials were stored in the western bay (Bay 6) of Building 319. Beginning in 1994, the eastern end of Building 319 was used for temporary (less than 90 days) hazardous waste storage by the Defense Reutilization and Marketing Organization (DRMO) - most of the waste consisted of expired shelf-life materials. In addition, a xylene spill was reported on November 18, 1991, inside Building 319, Section 4. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal,</p>

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

			<p>state and local regulations. In 1997, soil samples were collected outside the building at entry ways and results indicated levels of naturally occurring metals<sup>4</sup> that exceeded BCT screening criteria<sup>3</sup>, but are similar to background concentrations. Also, air sampling conducted in this building in December 1997 to assess the impact from storage of hazardous materials indicated no human health hazards. In 1997, approximately 8 feet of wall space within the western bay was remediated for low-level radioactive impacts. In a letter dated April 16, 1999, the Nuclear Regulatory Commission (NRC) amended the Depot's license and released the building for unrestricted use. In July 1999, the BCT agreed that this parcel should change from ECP Category 7 to a Category 4 based on the cleanup of both the xylene spill and the low-level radioactivity. 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.</p>
<p>Parcel 15.4 - Building 702 concrete foundation (building demolished in 1998)</p>	<p>Petroleum products Paints Chlorinated Solvents Chromium</p>	<p>Exact start date unknown assumed facility activation in 1942</p>	<p>Building 702 was demolished in February 1998. Originally, Building 702 served as the officer's hobby shop. According to interview with Depot personnel, hazardous substances and petroleum products were used and stored in the building. A portion of the building was reportedly used as a spray paint booth. This parcel is associated with Screening Site 79 (Fuels, Miscellaneous Liquids, Wood and Paper). In 1997, samples were collected outside of the building in Parcel 15.6 and results indicated one chromium<sup>4</sup> level above background. No other BCT screening criteria<sup>3</sup> were exceeded, but levels of metals, dieldrin and PAHs were detected in the soil in Parcel 15.6 and will be further evaluated. In February 1999, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. 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.</p>
<p>Parcel 15.5 - Former waste material storage area west of Buildings 308 and 309</p>	<p>Pesticides (dieldrin, DDT) Herbicides Waste oil containing PCP Chlorinated solvents Corrosives Flammables Petroleum products Oils</p>	<p>Exact start date unknown assumed facility activation in 1942</p> <p>No exact dates or substances for releases due to leaking storage containers</p>	<p>This parcel is associated with the following Screening Sites: 36 (DRMO Hazardous Waste Concrete Storage Pad), 37 (DRMO Hazardous Waste Gravel Storage Pad), 38 (DRMO Damaged/Empty Hazardous Materials Drum Storage Area), and 39 (DRMO Damaged/Empty Lubricant Container Area). The open storage area/gravel area was also historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997 samples were collected and results indicated levels of metals<sup>4</sup>, DDT, trichloroethene and 1,1,2,2-tetrachloroethane that exceeded BCT screening</p>

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

	Lubricants Trichloroethene 1,1,2,2-Tetrachloroethane		criteria <sup>3</sup> . This parcel has been selected for early removal. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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. <sup>1</sup>
Parcel 15.6 - Open storage areas X09, Y10 and Y50, Buildings 301, 309, T416, , 701 and 717, and surrounding open land area extending to Dunn Road	Pesticides (dieldrin, DDT, DDD, DDE) Herbicides Transformers containing non-PCB and PCB containing mineral oil Waste oil containing PCP/PAHs/lead/dioxins/furans Corrosives Flammables Petroleum products Chlorinated solvents  Spills: Mineral (dielectric) fluid (non-PCB) Cleaning compound solvent Sulfuric acid Hydraulic fluid	Exact start date unknown assumed facility activation in 1942  No exact dates or substances for releases due to leaking containers  Spill dates: March 26, 1991  December 2, 1991  May 23, 1994 September 12, 1995	This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. This parcel is associated with Screening Sites 54 (East Stormwater Runoff Canal) and 55 (North Stormwater Runoff Canal). A 4,000-gallon heating oil tank was removed in July 1994 from outside of Building 319. No evidence of release from this tank has been identified. Several spills were reported for this parcel and included dielectric fluid (non PCB), cleaning compound solvent, sulfuric acid, hydraulic fluid. The Spill Team responded to these spills, took the appropriate action and disposed of the residues in accordance with federal, state and local regulations. In 1997, samples were collected and results indicated levels of metals <sup>4</sup> , dieldrin, DDD, DDE, DDT and dioxins/furans in soils above BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 18.2 - Open land area surrounding Building 560	Pesticides Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. Samples taken from other railroad tracks will be used to determine appropriate actions for railroad tracks sitewide. A sample was collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In September 1997 the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. The performance of industrial and/or commercial operations at this site in accordance with the Lease Restrictions will not

### Enclosure 3

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

			pose an unacceptable risk to human health or the environment.
Parcel 19.1 - Building 468 and open land area surrounding Buildings 465, 468 and 469 (Building 467, erected on this parcel in 1987, removed in 1996)	Petroleum products Pesticides Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	Building 468 was used to store facility maintenance vehicles and equipment. This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. Samples taken from other railroad tracks will be used to determine appropriate actions for railroad tracks sitewide. This parcel also contains a 1,000-gallon oil/water separator connected to the vehicle wash located at Building 465. The separator was cleaned upon facility closure and since then only washwater from grass cutting equipment has entered the separator. No spills are documented for this parcel. No sampling has been conducted at this parcel. In February 1999, the BCT conducted a visual inspection of this parcel and agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 19.2 - Building 465, a vehicle wash rack	Petroleum products Chlorinated solvents	Exact start date unknown assumed building construction in 1984	Chemical engine cleaners/degreasers may have been used or released in this building. This building contains a floor drain/sump connected to an oil/water separator, which is physically located in Parcel 19.1. No sampling has been conducted at this parcel. In February 1999, the BCT conducted a walk through of Building 465, determined that the sump had been cleaned upon facility closure and used since then only to wash grass cutting equipment. In May 1999, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. 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.

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

<p>Parcel 19.3 - Building 469, a 9,600-sq. ft. building erected in 1960</p>	<p>Chlorinated solvents Corrosives Petroleum products Transformers filled with PCB and non-PCB mineral oil</p> <p>Spill: - PCB-containing Mineral oil</p>	<p>Exact start date unknown assumed building construction in 1960</p> <p>Spill date: December 16, 1993</p>	<p>Acids, parts cleaning fluids and petroleum products were stored and used in Building 469. This parcel is associated with No Further Action Sites 40 (Safety-Kleen Units) and 41 (Satellite Drum Accumulation Areas). A self-contained Safety-Kleen unit was used in Building 469. Building 469 was also a satellite drum accumulation area for waste petroleum products and sulfuric acid. There is no evidence of releases from the units or accumulation area. No sampling occurred at this parcel. On December 16, 1993, a transformer oil spill was reported at Building 469. Approximately 6 ounces of material was spilled on the south wall and floor near the entrance. The sheet rock wall and concrete floor absorbed some of the oil. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. Samples were collected from the absorbent and concrete and results indicated PCB-1242. According to the Spill Team Leader, the effected area was removed during sampling operations. In February 1999, the BCT conducted a walk through, was unable to locate the spill area. In May 1999, the BCT agreed that no further evidence of the spill remained, that a remedial action occurred, and that this parcel should change from an ECP Category 7 to a Category 4. 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.<sup>1</sup></p>
<p>Parcel 20.5 - Open land area surrounding Buildings 470, 489 and 670</p>	<p>Pesticides (dieldrin) Herbicides Waste oil containing PCP</p>	<p>Exact start date unknown assumed facility activation in 1942</p>	<p>This parcel contains railroad track and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and results indicated levels of dieldrin that exceeded BCT screening criteria<sup>3</sup>. Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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.<sup>1</sup></p>

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Parcel 20.6 - Spill area between Buildings 489 and 490	Sulfuric Acid Waste oil containing PCP/PAHs	June 10, 1993	A sulfuric acid spill (approximately 2 gallons) was reported on June 10, 1993 between Buildings 489 and 490 on 5th Street. The Spill Team responded, applied sodium bicarbonate and disposed of the residue in accordance with federal, state and local regulations. Samples were collected from the gravel area east of the spill area and results indicated levels of PAHs, arsenic, chromium and lead <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 21.5 - Open land area surrounding Buildings 490, 689 and 690	Pesticides Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. This parcel is also associated with Screening Site 76 (Unknown Wastes Near Building 690). Samples were collected and results indicated levels of chromium and lead <sup>4</sup> in subsurface soils that exceeded BCT screening criteria <sup>3</sup> . Chromium and lead concentrations in subsurface soils were similar to levels found elsewhere on the Depot and may be naturally occurring. Dieldrin was detected, but was below screening criteria. This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 22.1 - Open land area between the east ends of Buildings 689 and 690	Pesticides Herbicides Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of antimony <sup>4</sup> and PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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



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			commercial operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 22.2 - Spill area east of Building 685	Pesticides Herbicides Waste oil containing PCP/PAHs Sulfuric (battery) acid	Exact start date unknown assumed facility activation in 1942  No exact dates for battery acid spills Known to have occurred charging MHE batteries or adding water to MHE batteries	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel is also associated with Screening Site 77 (Unknown Wastes Near Buildings 689 and 690). Battery acid spilled in the warehouse during MHE battery charging procedures was washed out a nearby door onto the gravel area immediately east of Building 685. In 1997, samples were collected and results indicated levels of antimony, arsenic <sup>4</sup> , dieldrin and PAHs in surface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 23.6 - Open land area surrounding Buildings 783, 787 and 793, Gates 6, 7 and 8, and extending to Ball Road	Pesticides Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides as well as railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. This parcel also contains the open land area surrounding Screening Site (SS) 82 (Flammable storage - Buildings 783 and 793). Samples were collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 23.7 - Building 783	Flammables Hexachlorethane smoke pots Chloraceto- phenone tear gas solution Phosphorus/ rubber-gasoline solution	Exact start date unknown assumed facility activation in 1942  Chemical Warfare Service's mission at the Memphis Dépot ended on	Building 783 was used by the U.S. Army Chemical Warfare Service for storage of flammable materials including hexachlorethane smoke pots, burning-mixture chloracetophenone tear gas solution and phosphorus/ rubber-gasoline solution filled grenades. The U.S. Army Corps of Engineer - St. Louis District found no evidence of release or disposal at this building of chemical warfare material during research for preparation of the

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	Small round ammunition Explosive ordnance	March 31, 1961	<p>"Ordnance and Explosive Waste/Chemical Warfare Materials Archive Search Report for Memphis Defense Depot." This parcel is also associated with Screening Site 82 (Flammables in Buildings 783 and 793). In 1997, samples were collected from the grassy area adjacent to Building 783 and results indicated levels of arsenic, chromium, lead<sup>4</sup> and dieldrin that exceeded BCT screening criteria<sup>3</sup>. The Preliminary Risk Evaluation indicated that noncarcinogenic risks for industrial scenarios was below one in a million, but were above one in a million for residential scenario due to naturally occurring metals. Carcinogenic risks were above one in a million for both industrial and residential scenarios due to arsenic. In February 1997, the BCT conducted a visual inspection of this parcel and agreed that this parcel change from an ECP Category 7 to a Category 3. 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.</p>
Parcel 23.8 - Building 793	<p>Flammables Hexachlorethane smoke pots Chloracetophenone tear gas solution Phosphorus/ rubber-gasoline solution Small round ammunition Explosive ordnance</p>	<p>Exact start date unknown assumed facility activation in 1942</p> <p>Chemical Warfare Service's mission at the Memphis Depot ended on March 31, 1961</p>	<p>Building 793 was used by the U.S. Army Chemical Warfare Service for storage of flammable materials including hexachlorethane smoke pots, burning-mixture chloracetophenone tear gas solution and phosphorus/ rubber-gasoline solution filled grenades. The U.S. Army Corps of Engineer - St. Louis District found no evidence of release or disposal at this building of chemical warfare material during research for preparation of the "Ordnance and Explosive Waste/Chemical Warfare Materials Archive Search Report for Memphis Defense Depot." This parcel is also associated with Screening Site 82 (Flammables in Buildings 783 and 793). In 1997, samples were collected from the grassy area adjacent to Building 793 and results indicated levels of arsenic, chromium, lead<sup>4</sup> and dieldrin that exceeded BCT screening criteria<sup>3</sup>. The Preliminary Risk Evaluation indicated that noncarcinogenic risks for industrial scenarios was below one in a million, but were above one in a million for residential scenario due to naturally occurring metals. Carcinogenic risks were above one in a million for both industrial and residential scenarios due to arsenic. In February 1997, the BCT conducted a visual inspection of this parcel and agreed that this parcel change from an ECP Category 7 to a Category 3. 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.</p>

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

Parcel 23.10 - Open storage area X01	Pesticides Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	Open storage area X01 was a small lake when the Depot opened in 1942. This parcel contains an open storage area and a gravel area that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. Samples were collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In October 1997, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 23.11 - Open land area surrounding Building 995 extending to Ball Road	Pesticides Herbicides	Exact start date unknown assumed facility activation in 1942	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, a sample was collected from Parcel 23.9, a spill area within Parcel 23.11. Results indicated lead <sup>4</sup> in subsurface soils that slightly exceeded (24.3 mg/kg vs. 24 mg/kg) BCT screening criteria <sup>3</sup> . The BCT has made no decision to change the ECP category for this parcel. 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. <sup>1</sup>
Parcel 24.1 - Former material recoupment area at southeast corner of Building 873	Chlorinated solvents Sulfuric acid Oils Lubricants Corrosives Flammables Petroleum products Pesticides (dieldrin) Herbicides Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942 - 1984/1985  No exact dates or substances for spills that occurred during repouring or repackaging activities	The gravel area east of Building 873 was used as a materials recoupment area (remove materials from damaged containers then repackage the materials) until operations were moved inside Building 873 in 1984/1985. The gravel area was also historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel is associated with Remedial Investigation Site 27 (Former Recoupment Area - Building 873). In 1985 soil impacted by spills during recoupment activities was removed. In 1997, samples were collected and results indicated elevated levels of vanadium <sup>4</sup> and PAHs, which will be addressed in a sitewide risk evaluation. The November 1996 Environmental Baseline Survey categorized this parcel as an ECP Category 5 since a removal action had occurred, but further action may be needed. Appropriate health and safety measures will be implemented during all remediation activities to ensure the

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			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. <sup>1</sup>
Parcel 24.2 - Open storage area X03	Flammables Petroleum products Pesticides Herbicides Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942	This parcel was used for storage of flammable materials in 55-gallon drums until 1988. The area then became steel storage. This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated arsenic <sup>4</sup> , PAHs and PCP levels in surface soils and lead <sup>4</sup> in subsurface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 25.1 - Building 873	Chlorinated solvents Oils Lubricants Corrosives Petroleum products Flammables  Spills: Tetrachloro- ethylene Cleaning compound solvent Descaling compound Corrosion removing compound Sulfuric acid Hydrofluoric acid Hydrochloric acid Tincture benzoin Diethylene glycol Methanol	Exact start date unknown assumed facility activation in 1942 - September 1997  Spill dates: March 9, 1990  December 7, 1990 November 18, 1991 February 13, 1992  July 21, 1993 August 6, 1993  October 25, 1993 November 29, 1993 April 7, 1994  June 8, 1994 July 11, 1994 August 11, 1994	Building 873 stored hazardous substances such as chlorinated solvents, corrosives, petroleum products, oils and lubricants. The southern end of the building was used as the hazardous substances and petroleum products recoupment area (remove materials from damaged containers then repack the materials) and is associated with Remedial Investigation Site 27 (Former Recoupment Area - Building S873). Recoupment activities were conducted until the current Recoup Building was constructed in 1987/1988. Several hazardous substance spills were documented in Building 873 (40 gallons of tetrachloroethylene, 55 gallons of cleaning compound solvent, 20 gallons of cleaning compound solvent, 10 gallons of descaling compound, 1.5 gallons of corrosion removing compound, .75 gallons of corrosion removing compound, 2 gallons of sulfuric acid, 3 gallons of hydrofluoric acid, .5 gallon of hydrochloric acid, 3 pints of tincture benzoin, 55 gallons of diethylene glycol and 3 pints of methanol). The Spill Team responded, took the appropriate action and disposed of the residue in accordance with federal, state and local regulations. Samples were taken outside of the building and will be addressed in Parcel 25.2. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 4 based on the cleanup of the spills.

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			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.
Parcel 25.2 - Building 875 and open land area surrounding Buildings 873 and 875	Pesticides Herbicides Waste oil containing PCP/PAHs Chlorinated solvents Corrosives Flammables Petroleum products Spills: Tetrachloro- ethylene Hydraulic fluid Fog oil Cleaning compound solvent Lube oil Diethylene glycol Transmission fluid Malathion Oils/lubricants	Exact start date unknown assumed facility activation in 1942 - September 1997      Spill dates: March 9, 1990  August 16, 1991 Nov. 26, 1991 Nov. 26, 1991  July 12, 1993 July 11, 1994 August 29, 1994  March 6, 1993 December 6, 1995	Building 875 is an open shed warehouse that stored various materials including hazardous substances and petroleum products when Building 873 was full. Several spills were documented for the open land area outside Buildings 873 and 875 (40 gallons of tetrachloroethylene, 2 gallons of hydraulic fluid, 55 gallons of fog oil, 18 gallons of cleaning compound solvent, 55 gallons of lube oil, 25 gallons of lube oil, 55 gallons of diethylene glycol, 5 gallons of transmission fluid, 2 gallons of malathion and 2 quarts of oil/lubricant). The Spill Team responded, took the appropriate action, removed stained soil and disposed of the residue in accordance with federal, state and local regulations. This parcel also contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. A 1,000-gallon heating oil tank was closed in place in July 1994 outside Building 875. Samples were collected from around Buildings 873 and 875 and results indicated levels of PAHs that exceeded the BCT screening criteria <sup>1</sup> . A portion of Parcel 25.2 is an early removal candidate depending upon results of a risk assessment. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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. <sup>1</sup>
Parcel 26.1 - Open land area surrounding Building 970	Pesticides Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated no levels that exceeded BCT screening criteria <sup>1</sup> . However, in October 1997 the BCT agreed that this parcel remain an ECP Category 7 until surface soils could be further evaluated. 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. <sup>1</sup>

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Parcel 27.1 - Open land area surrounding Building 972	Pesticides Herbicides Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of chromium <sup>4</sup> , PAHs and pesticides in surface soils and chromium and lead <sup>4</sup> in subsurface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997 the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>
Parcel 28.1 - Open storage area X04 and open land area extending to Perry Road	Pesticides Herbicides Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were sprayed with herbicides and pesticides. According to Depot personnel, this area did not store hazardous substances. Samples were collected and results indicated aluminum and iron <sup>4</sup> in surface soil near the range of the BCT screening criteria <sup>3</sup> . The Preliminary Risk Evaluation indicated that noncarcinogenic risks were above one in a million due to aluminum and iron <sup>4</sup> , but the concentrations of these constituents in surface soils did not pose significant health risks. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 28.2 - Building 1089 and surrounding open land area extending to Perry Road	Pesticides Herbicides Waste oil containing PCP Corrosives Paints and paint related products Chlorinated solvents	Exact start date unknown assumed facility activation in 1942 - September 1997	This parcel is associated with Screening Site 89 (Acids - Building 1089). Building 1089 was used to store acids, paints and cleaning solvents. This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. In 1997 samples were collected and results indicated lead, arsenic and chromium <sup>4</sup> levels that exceeded BCT screening criteria <sup>3</sup> . Monitoring well 21 (MW-21) is also associated with this parcel. Groundwater samples taken from MW-21 detected VOCs and metals. These issues will be further defined during the current Main Installation Groundwater Investigation. In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area



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			surrounding Building 1089 has been selected for a removal action. 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. <sup>1</sup>
Parcel 29.2 - Open storage areas X27 and X30, Building 801 and Building 802 and surrounding open land area extending to Perry Road	Pesticides (dieldrin, DDT) Herbicides Waste oil containing PCP Methylene chloride  Spills: Hydraulic fluid	Exact start date unknown assumed facility activation in 1942  Spill dates: May 13, 1994 April 19, 1994	This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. In 1997, samples were collected and results indicated levels of chromium <sup>4</sup> , dieldrin, DDT and methylene chloride in surface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997 the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>
Parcel 29.3 - Storm drainage ditch adjacent to Gate 9	Pesticides (DDT/p,pN-DDD/p,pN-DDE) Herbicides	Exact start date unknown assumed facility activation in 1942	This parcel is associated with Screening Site 56 (Western Storm Drainage Canal). In 1997, samples were collected and results indicated levels of aluminum, arsenic, chromium, iron and manganese <sup>4</sup> in surface soil; lead <sup>4</sup> in subsurface soil; PAHs <sup>5</sup> , lead <sup>4</sup> , p,pN-DDD and p,pN-DDE in sediments under the concrete lined ditch that exceeded BCT screening criteria <sup>3</sup> . PAHs were detected in sediments at levels exceeding criteria, but below background values. This parcel requires further investigation. In September 1997, the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>



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Parcel 30.2 - Spill area between Buildings 925 and 949	Flammables Pesticides Herbicides Waste oil containing PCP Chlorinated solvents  Spill: Xylene Toluene Methyl ethyl ketone	Exact start date unknown assumed facility activation in 1942  Spill date: January 19, 1988	This parcel is associated with the former X25 open storage area and No Further Action Site 53 (Flammable Materials Spill). Beginning in the 1940s, flammable solvents were stored in drums on a gravel open storage area, then within an earthen-bermed open storage area at the northern end of the X25 area followed by a concrete-bermed open storage area. In the 1980s a fabric tension structure was erected over the area. In 1988 the structure collapsed during heavy winds releasing approximately 327 gallons of flammable material (xylene, toluene, methyl ethyl ketone) that mixed with approximately 30,000 gallons of water within the bermed area. The Depot Spill Team and Memphis Fire Department Hazardous Materials Team responded to the spill, pumped all liquid within the berm into tankers for transport to a licensed disposal facility. Building 925 was constructed in 1994 over a portion of the area. No sampling occurred in this parcel. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7 until samples were collected. In January 1998, two surface soil samples were collected, and results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 4.
Parcel 30.3 - Open storage area X23 and open land area surrounding Buildings 925 and 949	Pesticides Herbicides Waste oil containing PCP Flammables Chlorinated Solvents	Exact start date unknown assumed facility activation in 1942	This parcel is associated with open storage area X23 and former open storage area X25 where drums of flammable materials were stored. Buildings 925 and 949 were constructed on former open storage area X25. This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. No sampling has occurred at this parcel. Results from soil samples taken from other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel will be further investigation. In September 1997, the BCT agreed this parcel should remain an ECP Category 7. 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. <sup>1</sup>

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Parcel 30.5 - Former spray paint area south of Building 949	Paints (that may have contained metals)	Exact start date unknown assumed facility activation in 1942	This parcel is associated with Screening Site 83 (Dried Paint Disposal Area). According to interviews with Depot personnel, spray painting and sand blasting occurred at this location until the early 1980s. In 1997, samples were collected and results indicated levels of antimony, barium, beryllium, cadmium, chromium, iron, lead and zinc <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In September 1997, the BCT agreed this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 31.1 - Open storage areas X17, X19, X20 and X21	Pesticides (dieldrin) Herbicides Waste oil containing PCP/PAHs Dibenz(ah)anth- racene Flaminables Corrosives Transformers containing PCB and non-PCB mineral oil Spill: Small amount of cleaning compound solvent leaking from 12 drums	Exact start date unknown assumed facility activation in 1942  Spill date: May 7, 1990 in X20 area	This parcel contains railroad tracks and open storage areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic, antimony, chromium, lead <sup>4</sup> , dieldrin, dibenz(ah)anthracene and PCBs that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In February 1998, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 32.3 - Open storage area X02, Building 865 and the surrounding open land area	Flammables Corrosives Toxics Petroleum products Pesticides Herbicide Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942 and building construction in 1988  No exact dates or substances for releases due to leaking containers	This parcel is associated with Screening Site 28 (Building 865; the Recoup Area Building). Building 865 is a handling area used to transfer hazardous substances/wastes or petroleum products/wastes from damaged or leaking containers into undamaged containers. This parcel also includes an open storage area and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic and lead <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed this parcel should remain an ECP Category 7. Appropriate health

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

			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. <sup>1</sup>
Parcel 33.7 - Former aboveground storage tank east of Building 770	Diesel fuel Pesticides Herbicides Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation and tank construction in 1942	This parcel is associated with Screening Site 81 (Fuel Oil Building 765), a 12,000-gallon diesel fuel aboveground storage tank that was removed in 1994. This parcel also contains a gravel area that was historically sprayed with pesticides, herbicides and waste-oil containing PCP. In 1997, samples were collected and results indicated levels of PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 33.8 - Building 863 (MHE storage building and battery charging station)	Materials Handling Equipment containing acids, oils and lubricants	Exact start date unknown assumed building construction in 1943	The 1996 EBS visual inspection of this building identified several oil stains on the concrete floor of this building. In January 1998, two surface soil samples were collected from a nearby stormwater drainage area to determine if any metals were released due to battery charging operations. Sample results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 33.9 - Open storage areas X05, X06, X07, X08, X10, X11 and X12, Buildings 737 and 720 and open land area surrounding Buildings 720, 737, 753, 755, 756, 860 and 863	Flammables Corrosives Petroleum products Pentachloro- phenol Transformers containing non- PCB and PCB mineral oil Pesticides Herbicides Waste oil containing	Exact start date unknown assumed facility activation in 1942	This parcel is associated with Screening Site 42 (Former Pentachlorophenol (PCP) Dip Vat Area), Screening Site 43 (Former Underground PCP Tank Area), Screening Site 46 (Pallet Drying Area) and Screening Site 80 (Fuel and Cleaner Dispensing at Building 720). In 1985, the PCP dip vat, underground storage tank, associated piping and impacted soil were removed. According to interviews with Depot personnel, cleaners were not dispensed from Building 720; parts cleaning solutions were used in the building. No evidence was found of a 1,000-gallon waste oil tank inside Building 720. This parcel contains railroad tracks, open storage areas and other gravel areas that were

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

	<p>PCP/PAHs</p> <p>Spill: Ethyl acetate/naphtha aromatic</p>	<p>Spill date: July 26, 1993</p>	<p>historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. This parcel also contained a 12,000-gallon diesel aboveground storage tank west of Building 720 that was removed in 1997. Hazardous substances and petroleum products were historically stored in open storage areas X05, X06, X07, X08, X10, X11 and X12. Transformers containing mineral oil (non-PCB and PCB containing) were also stored in open storage area X07. In 1993, leaking 55-gallon drums of ethyl acetate/naphtha aromatic stored in X10 were reported to the Spill team, which responded, took the appropriate actions and disposed of all residue in accordance with federal, state and local regulations. In 1997, samples were collected and results indicated levels of lead, chromium, arsenic<sup>4</sup>, PAHs, dieldrin and PCB-1260 that exceeded BCT screening criteria<sup>3</sup>. This parcel requires further investigation. In February 1999, the BCT agreed that this parcel should remain an ECP Category 7. 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.<sup>1</sup></p>
<p>Parcel 34.2 - Open land area surrounding Building 360</p>	<p>Pesticides (dieldrin, chlordane) Herbicides Waste oil containing PCP</p>	<p>Exact start date unknown assumed facility activation in 1942</p>	<p>This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and results indicated chlordane at levels that exceeded the BCT screening criteria<sup>3</sup>. The Preliminary Risk Evaluation indicated that the carcinogenic and noncarcinogenic risks were below one in a million for both industrial and residential scenarios. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 3. 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.</p>
<p>Parcel 35.1 - Building 1090</p>	<p>Paints Paint related materials Lubricating oil P-19 preservation oil Corrosion</p>	<p>Exact start date unknown assumed in 1952</p>	<p>Hazardous substances stored in Building 1090 included paint, paint thinner, lubricating oil, P-19 preservation oil, and corrosion prevention compound. No evidence of release. In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area surrounding this building has been selected</p>

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

	prevention compound		for early removal actions. 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. <sup>1</sup>
Parcel 35.2 - Building 1084, Building 1085 concrete foundation and surrounding open land area	Pesticides (dieldrin, DDT) Herbicides Waste oil containing PCP Petroleum products Grease Lubricants Waste oil	Exact start date unknown assumed facility activation in 1942 and building construction in 1952	This parcel includes Early Removal Site 88 (Petroleum, Oils and Lubricants at Building 1085) which was a vehicle grease rack removed by 1988; Early Removal Site 29 (Former Underground Waste Oil Storage Tank) that was associated with Building 1085 and was removed in 1988, and Early Removal Site 87 (Pesticide/DDT Storage in Building 1084). This parcel also contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic, chromium, lead, cadmium <sup>4</sup> , dieldrin and petroleum that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as this parcel has been selected for early removal actions. 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. <sup>1</sup>
Parcel 35.3 - Building 1086 (spray paint booth)	Corrosives Paints Paint related products Corrosion prevention compound Chlorinated solvents (naphthalene)	Exact start date unknown assumed building construction in 1952	This parcel includes proposed No Further Action Site 30 (Building 1086, Spray Paint Booth). Building 1086 also contains a floor drain sump that is connected to the sanitary sewer. In 1997, a sample was collected from the sump and results indicated levels of antimony, cadmium, cooper, lead, nickel, zinc <sup>4</sup> and naphthalene that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area surrounding this building has been selected for early removal actions. 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. <sup>1</sup>

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

Parcel 35.4 - Building 1087 (spray paint booth), metal-roofed shed south of Building 1088 and open land area surrounding south ends of these buildings	Paints Paint related products Corrosion prevention compounds Pesticides (dieldrin, DDT) Herbicides Waste oil containing PCP/PAHs Chlorinated solvents (methylene chloride)	Exact start date unknown assumed building construction in 1952 and facility activation in 1942	This parcel includes Screening Site 31 (Building 1087, Former Spray Paint Booth) and Screening Site 33 (Sandblasting Waste Drum Storage Area south of Building 1088). This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of PAHs, methylene chloride, dieldrin, DDT, lead, chromium, cadmium, arsenic and antimony <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area surrounding this building has been selected for early removal actions. 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. <sup>1</sup>
Parcel 35.5 - Building 1088, a 2,272-sq. ft. building erected in 1953 and used as the sandblasting facility, Building 1091, a 800-sq. ft. building erected in 1953 and used for paint and paint related material storage, and surrounding open land area extending to Perry Road	Paints (that may have contained metals such as chromium and lead) Paint related products Corrosion preventatives Sandblast waste possible containing lead-based paint fragments Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942 - September 1997	This parcel is associated with Remedial Investigation Site 32 (Sandblasting Waste Accumulation Area). This parcel also contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were sprayed with herbicides and pesticides. Samples were collected (several samples were associated with Screening Site 33 which is included in Parcel 35.4 immediately south of Site 32). Results associated with Site 32 indicated levels of chromium, lead, arsenic <sup>4</sup> and PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel has been selected for early removal. In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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. <sup>1</sup>

<sup>1</sup> 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.

<sup>2</sup> Records indicate that many buildings that stored perishables or textiles during the Depot's history may have been fumigated to control pests. Also, buildings that stored hazardous materials may have residual impacts from releases. The BCT determined that a representative number of buildings should be sampled for hazardous

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

substances in the air. The BCT reviewed these air sampling results at the December 1997 BCT meeting and determined that no further action was warranted or required.

<sup>3</sup> BCT screening criteria were established by the BCT during the August 1997 BCT meeting and basically consist of the EPA Region III Risk Based Concentration table and, for some metals, regional background levels.

<sup>4</sup> Certain substances such as arsenic, chromium, cadmium, antimony and lead occur naturally. Even though analytical results indicated these levels exceeded BCT screening criteria, these levels appear fairly consistently across the Depot and are being regarded as naturally occurring.

<sup>5</sup> Polycyclic aromatic hydrocarbons (PAHs) may also be the result of vehicle traffic. PAHs result when substances such as wood, gasoline and oils burn. Even though analytical results indicated PAHs that exceeded BCT screening criteria, these levels are being regarded as originating from vehicle traffic on nearby streets.



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### 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
Parcel 3.11 - Former flamethrower test area west of Hole 9	Diesel fuel Kerosene PAHs	Exact start date unknown assumed facility activation in 1942	This parcel is associated with Screening Site 69 (Flamethrower Liquid Fuel Application). This area was used to test flamethrowers and fuel and to practice firefighting techniques after ignition of the fuel. This parcel also contains grassed areas that were historically sprayed with herbicides and pesticides. In 1997, samples were collected and results indicated levels of dieldrin and PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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 recreational activities at this site in accordance with Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 13.5 - Building 211 and associated emergency generator, Gates 23, 24 and 25 and surrounding open land area extending to Airways Blvd	Waste oil containing PCP Diesel fuel	Exact start date unknown assumed facility activation in 1942 and Building 211 construction in 1988	The emergency generator adjacent to Building 211 contains an active 500-gallon diesel fuel aboveground storage tank. There is no evidence of release from this tank. This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP. Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 14.2 - Building 209 concrete foundation and surrounding open land area extending to Airways Blvd and Dunn Road	Heating oil Boiler blowdown Waste oil containing PCP	Exact start date unknown assumed building construction in 1942.	Building 209 was demolished in 1998. A 500-gallon heating oil tank was removed in July 1995. A 500-gallon boiler blow down tank was removed in July 1995. A 12,000-gallon heating oil tank was removed in July 1994. No evidence of release from these tanks has been found. This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated

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

			<p>dieldrin levels that exceeded BCT screening criteria<sup>3</sup>. Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel will be further investigated. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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.<sup>1</sup></p>
Parcel 15.4 - Building 702 concrete foundation	Oils Greases Lubricants	Exact start date unknown. Assume building construction in 1941.	<p>Building 702 was demolished in February 1998. Originally, Building 702 served as the officer's hobby shop. According to interview with Depot personnel, hazardous substances and petroleum products were used and stored in the building. A portion of the building was reportedly used as a spray paint booth. This parcel is associated with Screening Site 79 (Fuels, Miscellaneous Liquids, Wood and Paper). In 1997, samples were collected outside of the building in Parcel 15.6 and results indicated one chromium<sup>4</sup> level above background. In February 1999, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. 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.</p>
Parcel 15.5 - Former waste material storage area west of Buildings 308 and 309	Damaged oil containers Damaged lubricant containers Hazardous waste (95% of waste consisted of expired shelf-life materials) in a variety of containers. Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	<p>Damaged lubricant containers in a variety of sizes on pallets and empty oil barrels stored with the open end down were stored on a gravel pad north of B Street and west of Building 309. This parcel is associated with Screening Site 39 (DRMO Damaged/Empty Lubricant Containers). The open storage area and gravel area were also historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997 samples were collected and results indicated levels of metals<sup>4</sup>, DDT, trichloroethene and 1,1,2,2-tetrachloroethane that exceeded BCT screening criteria<sup>3</sup>. This parcel has been selected for early removal. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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</p>

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

			site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment. <sup>1</sup>
Parcel 15.6 - Open storage areas X09, Y10 and Y50, Buildings 301, 309, T416, , 701 and 717, and surrounding open land area extending to Dunn Road	Petroleum products including oils, greases, lubricants and fuels Transformers containing: mineral (dielectric) oil (non-PCB and PCB container) Waste petroleum products Waste oil containing PCP  Spills: Dielectric fluid Hydraulic fluid	Exact start date unknown assumed facility activation in 1942         Spill dates: March 26, 1991  September 12, 1995	This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. A 4,000-gallon heating oil tank was removed in July 1994 from outside of Building 319. No evidence of releases from this tank has been identified. Transformers slated for disposal were staged on a bermed, concrete pad. Petroleum product spills were documented for this parcel and included ,1 gallon of dielectric fluid (non PCB) and 1.25 gallons of hydraulic fluid. The Spill Team responded to these spills, took the appropriate action and disposed of the residues in accordance with federal, state and local regulations. In 1997, samples were collected and results indicated levels of metals <sup>4</sup> , dieldrin, DDD, DDE, DDT and dioxins/furans in soils above BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 18.2 - Open land area surrounding Building 560	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. Samples taken from other railroad tracks will be used to determine appropriate actions for railroad tracks sitewide. A sample was collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In September 1997 the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.

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

Parcel 19.1 - Building 468 and open land area surrounding Buildings 465, 468 and 469	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. Samples taken from other railroad tracks will be used to determine appropriate actions for railroad tracks sitewide. This parcel also contains a 1,000-gallon oil/water separator connected to the vehicle wash located at Building 465 (Parcel 19. 2) that was cleaned after Depot closure. In 1996, a visual inspection of Building 468 indicated oil/hydraulic fluid stains due to leaking equipment. No spills are documented for this parcel. No sampling has been conducted at this parcel. In February 1999, the BCT conducted a visual inspection of this parcel and agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 19.2 - Building 465, vehicle wash rack.	Waste oil and hydraulic fluid	Exact start date unknown assumed building construction in 1984 until September 1997	Chemical engine cleaners/degreasers may have been used or released in this building. This building contains a floor drain/sump connected to an oil/water separator, which is physically located in Parcel 19.1. No sampling has been conducted at this parcel. In February 1999, the BCT conducted a walk through of Building 465, determined that the sump had been cleaned after Depot closure and that only grass cutting equipment had been cleaned since then. No spills were recorded for this parcel, and no other environmental concerns have been identified. In May 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 19.3 - Building 469	Oils Greases Lubricants Transformer mineral oil Spill: Transformer mineral oil (PCB containing)	Exact start date unknown assumed building construction in 1960 until September 1997  Spill date: December 16, 1993	Acids, parts cleaning fluids and petroleum products were stored and used in Building 469. This parcel is associated with No Further Action Sites 40 (Safety-Kleen Units) and 41 (Satellite Drum Accumulation Areas). A self-contained Safety-Kleen unit was used in Building 469. Building 469 was also a satellite drum accumulation area for waste petroleum products and sulfuric acid. There is no evidence of releases from the units or accumulation area. No sampling occurred at this parcel. On December 16, 1993, a transformer oil spill was reported at Building 469.

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

			<p>Approximately 6 ounces of material was spilled on the south wall and floor near the entrance. The sheet rock wall and concrete floor absorbed some of the oil. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. Samples were collected from the absorbent and concrete and results indicated PCB-1242. According to the Spill Team Leader, the effected area was removed during sampling operations. In February 1999, the BCT conducted a visual inspection and was unable to locate the spill area. In May 1999, the BCT agreed that no further evidence of the spill remained, that a remedial action occurred, and that this parcel should change from an ECP Category 7 to a Category 4. 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.</p>
Parcel 20.1 - Spill area on north dock of Building 489	Motor oil	November 3, 1995	<p>A 1-gallon oil spill was reported on November 3, 1995 at the north dock of Building 489, Section 4. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. The November 1996 Environmental Baseline Survey placed this parcel in ECP Category 3. In 1997 the ECP category definitions changed so that Category 3 was no longer appropriate for petroleum product releases. In December 1998, the BCT agreed Category 3 was not appropriate, as the release involved a petroleum product, and agreed the parcel should change from an ECP Category 3 to a Category 2. 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.</p>
Parcel 20.5 - Open land area surrounding Buildings 470, 489 and 670	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	<p>This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and results indicated levels of dieldrin that exceeded BCT screening criteria<sup>3</sup>. Results from soil samples taken at other railroad track locations will be used to determine appropriate actions for railroad tracks sitewide. This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. Appropriate health and safety measures will be implemented.</p>

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

			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. <sup>1</sup>
Parcel 21.5 - Open land area surrounding Buildings 490, 689 and 690	<p>Pesticides Herbicides Waste oil containing PCP.</p> <p>Spills: Oil Hydraulic fluid Hydraulic fluid Turbine engine oil</p>	<p>Exact start date unknown assumed facility activation in 1942</p> <p>Spill dates: January 17, 1995 August 15, 1995  November 6, 1995  February 17, 1994</p>	<p>This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste-oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. This parcel is also associated with Screening Site 76 (Unknown Wastes Near Building 690). Petroleum product spills were documented for this parcel (2.5 gallons of oil, 2 gallons of hydraulic fluid, 2 gallons of hydraulic fluid and 10 gallons of turbine engine oil). Samples were collected and results indicated levels of chromium and lead<sup>4</sup> in subsurface soils that exceeded BCT screening criteria<sup>3</sup>. This parcel requires further investigation. In September 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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.<sup>1</sup></p>
Parcel 22.1 - Open land area between the east ends of Buildings 689 and 690	Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942	<p>This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of antimony and PAHs that exceeded BCT screening criteria<sup>3</sup>. This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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.<sup>1</sup></p>

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

Parcel 22.2 - Spill area east of Building 685	Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel is also associated with Screening Site 77 (Unknown Wastes Near Buildings 689 and 690). In 1997, samples were collected and results indicated levels of antimony, arsenic <sup>4</sup> , dieldrin and PAHs in surface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 23.6 - Open land area surrounding Buildings 783, 787 and 793, Gates 6, 7 and 8, and extending to Ball Road	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides as well as railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. Samples were collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 23.9 - Spill area northwest of Building 995	Gasoline	September 13, 1993	A 10-gallon gasoline spill was reported on September 13, 1993, northwest of Building 995 on the paved road. The Spill Team responded, applied absorbent and disposed of the residue in accordance with federal, state and local regulations. In 1997, samples were collected from the spill area. Petroleum hydrocarbons were detected but were below the Tennessee cleanup level. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 3. In 1997 the ECP category definitions changed so that Category 3 was no longer appropriate for petroleum product releases. In December 1998, the BCT agreed Category 3 was not appropriate, as the release involved a petroleum product, and agreed the parcel should change from an ECP Category 3 to a Category 2. The performance of industrial and/or commercial



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

			operations at this site in accordance with the Lease Restrictions will not pose an unacceptable risk to human health or the environment.
Parcel 23.10 - Open storage area X01	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains an open storage area and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. Samples were collected and results indicated no levels that exceeded the BCT screening criteria <sup>3</sup> . In October 1997, the BCT agreed that this parcel change from an ECP Category 7 to a Category 3. 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.
Parcel 23.11 - Open land area surrounding Building 995	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains grassed areas that were historically sprayed with pesticides and herbicides and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, a sample was collected from Parcel 23.9, a spill area within Parcel 23.11. Results indicated lead <sup>4</sup> in subsurface soils that slightly exceeds (24.3 mg/kg vs. 24 mg/kg) BCT screening criteria <sup>3</sup> . The BCT has made no decision to change the ECP category for this parcel. 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. <sup>1</sup>
Parcel 24.1 - Former material recoupment area at southeast corner of Building 873	Petroleum products including oils, greases, lubricants and fuels Waste petroleum products Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942 until 1984/1985  No exact dates or substances for spills that occurred during repouring or repackaging activities	The gravel area east of Building 873 was used as a materials recoupment area (remove materials from damaged containers then repackage the materials) until operations were moved inside Building 873 in 1984/1985. The open storage area/gravel area was also historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel is associated with Remedial Investigation Site 27 (Former Recoupment Area - Building 873). In 1985 soil impacted by spills during recoupment activities was removed. In 1997, samples were collected and results indicated elevated levels of vanadium and PAHs, which will be addressed in a sitewide risk evaluation. The November 1996 Environmental Baseline Survey categorized this parcel as an ECP Category 5 since a removal action had occurred, but further

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

			action may be needed. 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. <sup>1</sup>
Parcel 24.2 - Open storage area X03	Waste oil containing PCP/PAHs  Spills: Mineral (dielectric) oil	Exact start date unknown assumed facility activation in 1942  Spill dates: June 3, 1994	This parcel was used for storage of flammable materials in 55-gallon drums until 1988. The area then became steel storage. This parcel contains railroad tracks, an open storage area and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. A petroleum product spill was documented for this parcel (10 gallons of non-PCB containing mineral oil from a transformer that fell off on a truck). The Spill Team responded, took the appropriate action and disposed of all residue in accordance with federal, state and local regulations. In 1997, samples were collected and results indicated arsenic <sup>4</sup> , PAHs and PCP levels in surface soils and lead <sup>4</sup> in subsurface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 25.1 - Building 873	Motor oil Hydraulic fluid Lubricant Corrosion preventative Gun oil Waste gasoline and diesel Waste motor oil Petroleum product spill residue  Spills:	Exact start date unknown assumed building construction in 1942  Spill dates:	This parcel is associated with Building 873 and Remedial Investigation (RI) Site 27 (Former Recoupment Area/Building S873). Building 873 is an open shed warehouse that stored hazardous substances such as chlorinated solvents, corrosives, petroleum products, oils and lubricants. The southern end of the building is RI Site 27 that was used as the hazardous substances and POL recoupment area (remove materials from damaged containers then repackage the materials). Recoupment activities were conducted until the current Recoup Building was constructed in 1987/1988. Petroleum product spills inside Building 873 were documented and included 25 gallons of lube oil and <5 gallons of transmission fluid from a broken forklift. The Spill Team responded, took the appropriate action and disposed of the residue in accordance with federal,

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

	Lube oil Trans- mission fluid	March 9, 1991 August 29, 1994	state and local regulations. Samples were taken outside of the building and will be addressed in Parcel 25.2. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 4 based on the cleanup of the spills. 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.
Parcel 25.2 - Building 875 and open land area surrounding Buildings 873 and 875	Petroleum, oil and lubricant products Waste oil Heating oil Waste oil containing PCP/PAHs  Spills: Hydraulic fluid Fog oil Lube oil Lube oil Trans- mission fluid Oil/lubricant	Exact start date unknown assumed building construction and facility activation in 1942.  Spill dates: August 16, 1991  November 26, 1991 March 2, 1992 July 21, 1993 August 29, 1994  December 6, 1995	Building 875 is an open shed warehouse that stored various materials including hazardous substances and petroleum products when Building 873 was full. Petroleum product spills were documented for the open land area outside Buildings 873 and 875 (2 gallons of hydraulic fluid, 55 gallons of fog oil, 55 gallons of lube oil, 25 gallons of lube oil, <5 gallons of transmission fluid and 2 quarts of oil/lubricant). The Spill Team responded, took the appropriate action, removed stained soil and disposed of the residue in accordance with federal, state and local regulations. This parcel also contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. A 1,000-gallon heating oil tank was closed in place in July 1994 outside Building 875. Samples were collected from around Buildings 873 and 875 and results indicated levels of PAHs that exceeded the BCT screening criteria <sup>3</sup> . A portion of Parcel 25.2 is an early removal candidate. In September 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6. 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. <sup>1</sup>
Parcel 26.1 - Open land area surrounding Building 970	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . However, in October 1997 the BCT agreed that this parcel remain an ECP Category 7 until surface soils could be further evaluated. Appropriate health and safety measures will be implemented during all remediation activities to

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

			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. <sup>1</sup>
Parcel 26.2 - Building 970	Heating oil	Exact start date unknown assumed building construction in 1942  No specific spill dates for generator oil leaks.	Building 970 contained an oil fired generator that had leaked oil onto the concrete foundation. This release consisted of only petroleum products. Absorbent was applied and the residue disposed in accordance with federal, state and local regulations. In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 2. 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.
Parcel 27.1 - Open land area surrounding Building 972	Waste oil containing PCP/PAHs  Spills: Hydraulic fluid Diesel fuel	Exact start date unknown assumed facility activation in 1942  Spill dates: October 5, 1993  March 14, 1995	This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. Petroleum product spills were documented for this parcel (34 gallons of hydraulic fluid, 3 gallons of diesel fuel). In 1997, samples were collected and results indicated levels of chromium <sup>4</sup> , PAHs and chlorinated pesticides in surface soils and chromium and lead <sup>4</sup> in subsurface soils that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997 the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>
Parcel 28.1 - Open storage area X04 and open land area extending to Perry Road	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains an open storage area and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas sprayed with herbicides and pesticides. According to Depot personnel, this area did not store hazardous substances. Samples were collected and results indicated aluminum and iron <sup>4</sup> in surface soil near the range of the BCT screening criteria <sup>3</sup> . The Preliminary Risk Evaluation indicated that noncarcinogenic risks were above one in a million due to aluminum and iron <sup>4</sup> , but the concentrations of these constituents in surface soils did not pose significant health risks. In October 1997, the

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			BCT agreed this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 28.2 - Building 1089 and surrounding open land area extending to Perry Road	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel is associated with Screening Site 89 (Acids - Building 1089). Building 1089 was used to store acids, paints and cleaning solvents. This parcel contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. In 1997 samples were collected and results indicated lead, arsenic and chromium <sup>4</sup> levels that exceeded BCT screening criteria <sup>3</sup> . Monitoring well 21 (MW-21) is also associated with this parcel. Groundwater samples taken from MW-21 detected VOCs and metals. These issues will be further defined during the current Main Installation Groundwater Investigation. In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area surrounding Building 1089 has been selected for a removal action. 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. <sup>1</sup>
Parcel 29.2 - Open storage areas X27 and X30	Waste oil containing PCP  Spills: Hydraulic fluid Hydraulic fluid	Exact start date unknown assumed facility activation in 1942  Spill dates: May 13, 1994  April 19, 1994	This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. Petroleum product spills documented for this parcel included 25 gallons of hydraulic fluid and 5 gallons of hydraulic fluid. In 1997, samples were collected and results indicated levels of chromium <sup>4</sup> , dieldrin, DDT and methylene chloride in surface soils that exceeded BCT screening criteria <sup>3</sup> . In October 1997 the BCT agreed that this parcel remain an ECP Category 7. 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. <sup>1</sup>

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

Parcel 30.3 - Open storage area X23 and open land area surrounding Buildings 925 and 949	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel is associated with open storage area X23 and former open storage area X25 where drums of flammable materials were stored. Buildings 925 and 949 were constructed on former open storage area X25. This parcel contains railroad tracks, open storage areas and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. No sampling has occurred at this parcel; however, pesticides and PAHs have been detected near railroad tracks at several Depot locations and will be evaluated in an upcoming sitewide risk evaluation. In September 1997, the BCT agreed this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 31.1 - Open storage areas X17, X19, X20 and X21	Petroleum products including oils, greases, lubricants and fuels Trans- formers containing non-PCB and PCB mineral oil Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks and open storage areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic, antimony, chromium, lead <sup>4</sup> , dieldrin, dibenz(ah)anthracene and PCBs that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 32.3 - Open storage area X02, Building 865 and the surrounding open land area	Petroleum products including oils, greases lubricants and fuels Gasoline Diesel	Exact start date unknown assumed building construction in 1988 and facility activation in 1942	This parcel is associated with Screening Site 28 (Building 865, the Recoup Area Building). Building 865 is a handling area used to transfer hazardous substances/wastes or petroleum products/wastes from damaged or leaking containers into undamaged containers. This parcel also includes an open storage area and other gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic and lead <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October

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

			1997, the BCT agreed this parcel should remain an ECP Category 7. 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. <sup>1</sup>
Parcel 33.6 - Spill area west of Building 737	Mineral oil ( $<1$ ppm PCB)	November 9, 1995	A 50-gallon mineral oil ( $<1$ ppm PCB) spill was reported on November 9, 1995 outside of Building 737. The Spill Team responded, excavated contaminated material and disposed of the residue in accordance with federal, state and local regulations. The November 1996 Environmental Baseline Survey categorized this parcel as a Category 4. In 1997 the ECP category definitions changed so that Category 4 was no longer appropriate for petroleum product releases. In December 1998, the BCT agreed Category 4 was not appropriate, as the release involved a petroleum product, and agreed the parcel should change from an ECP Category 4 to a Category 2. 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.
Parcel 33.7 - Former aboveground storage tank east of Building 770	Waste oil containing PCP/PAHs Fuel oil	Exact start date unknown assumed facility activation in 1942 until 1994	This parcel is associated with Screening Site 81 (Fuel Oil Building 765), a 12,000-gallon fuel oil aboveground storage tank that was removed in 1994. This parcel also contains a gravel area that was historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In October 1997, the BCT agreed that this parcel should remain an ECP Category 7. 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. <sup>1</sup>



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

Parcel 33.8 is Building 863	Oils Greases Lubricants	Exact start date unknown assumed building construction in 1943  No exact dates or substances for releases from leaking equipment	The 1996 EBS visual inspection of this building identified several oil stains on the concrete floor of this building. In January 1998, two surface soil samples were collected from a nearby stormwater drainage area to determine if any metals were released due to battery charging operations. Sample results indicated no levels that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 33.9 - Open storage areas X05, X06, X07, X08, X10, X11 and X12, Buildings 720 and 737, and open land area surrounding Buildings 720, 737, 753, 755, 756, 860 and 863	Petroleum products including oils, greases, lubricants and fuels Gasoline Diesel Transformers containing non-PCB and PCB (PCB-1260) mineral oil Waste oil containing PCP/PAHs  Spills: Lube oil Lube oil	Exact start date unknown assumed Building 720 construction date and facility activation in 1942      Spill dates: March 17, 1992 January 13, 1994	This parcel is associated with Screening Site 42 (Former Pentachlorophenol (PCP) Dip Vat Area), Screening Site 43 (Former Underground PCP Tank Area), Screening Site 46 (Pallet Drying Area) and Screening Site 80 (Fuel and Cleaner Dispensing at Building 720). In 1985, the PCP dip vat, underground storage tank, associated piping and impacted soil were removed. According to interviews with Depot personnel, cleaners were not dispensed from Building 720; parts cleaning solutions were used in the building. No evidence was found of a 1,000-gallon waste oil tank inside Building 720. This parcel contains railroad tracks and gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. This parcel also contained a 12,000-gallon diesel aboveground storage tank west of Building 720 that was removed in 1997 and a 200-gallon gasoline underground storage tank adjacent to Building 754 was removed in 1986. Hazardous substances and petroleum products were historically stored in open storage areas X05, X06, X07, X08, X10, X11 and X12. Transformers containing mineral oil (non-PCB and PCB containing) were also stored in open storage area X07. Petroleum product spills were documented for X11 behind Building 860 (several quarts of lube oil and 3 gallons of lube oil). In 1997, samples were collected and results indicated levels of lead, chromium, arsenic <sup>4</sup> , PAHs, dieldrin and PCB-1260 that exceeded BCT screening criteria <sup>3</sup> . This parcel requires further investigation. In February 1999, the BCT agreed that this parcel should remain an ECP Category 7. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection

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

			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. <sup>1</sup>
Parcel 34.2 - Open land area surrounding Building 360	Waste oil containing PCP	Exact start date unknown assumed facility activation in 1942	This parcel contains railroad tracks that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were historically sprayed with pesticides and herbicides. A sample was collected and results indicated chlordane at levels that exceeded the BCT screening criteria <sup>3</sup> . In October 1997, the BCT agreed this parcel should change from an ECP Category 7 to a Category 3. 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.
Parcel 35.1 - Building 1090	Lubricating oil P-19 preservation oil	Exact start date unknown assumed building construction in 1952	Petroleum products stored in Building 1090 included lubricating oil and P-19 preservation oil. No evidence of release. In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the area surrounding this building has been selected for early removal actions. 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. <sup>1</sup>
Parcel 35.2 - Building 1084, Building 1085 concrete foundation and surrounding open land area	Hydraulic fluid Waste oil Greases Oils Lubricants Waste oil containing PCP	Exact start date unknown assumed building construction in 1952 and facility activation in 1942	This parcel includes Early Removal Site 88 (Petroleum, Oils and Lubricants at Building 1085) which was a vehicle grease rack removed by 1988; Early Removal Site 29 (Former Underground Waste Oil Storage Tank) that was associated with Building 1085 and was removed in 1988, and Early Removal Site 87 (Pesticide/DDT Storage in Building 1084). This parcel also contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of arsenic, chromium, lead, cadmium <sup>4</sup> , dieldrin and petroleum that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as this parcel has been selected for early removal actions. Appropriate health and safety measures will be implemented during all remediation activities to ensure the protection of human health and the

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

			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. <sup>1</sup>
Parcel 35.4 - Building 1087, a metal-roofed shed south of Building 1088 and the open land area surrounding the south ends of these buildings	Waste oil containing PCP/PAHs	Exact start date unknown assumed facility activation in 1942	This parcel includes Screening Site 31 (Building 1087, Former Spray Paint Booth) and Screening Site 33 (Sandblasting Waste Drum Storage Area South of Building 1088). This parcel also includes gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP. In 1997, samples were collected and results indicated levels of PAHs, methylene chloride, dieldrin, DDT, lead, chromium, cadmium, arsenic and antimony <sup>4</sup> that exceeded BCT screening criteria <sup>3</sup> . In February 1999, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as this parcel has been selected for early removal actions. 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. <sup>1</sup>
Parcel 35.5 - Building 1088 (sand blast facility), Building 1091 and surrounding open land area extending to Perry Road	Lubricating oil P-19 Preservation oil Waste oil containing PCP/PAHs	Exact start date unknown assumed Building 1091 construction in 1953 and facility activation in 1942	Building 1088 is associated with Remedial Investigation Site 32 (Sandblasting Waste Accumulation Area). Petroleum products stored in Building 1091 included lubricating oil and P-19 preservation oil. No evidence of release. This parcel also contains gravel areas that were historically sprayed with pesticides, herbicides and waste oil containing PCP and grassed areas that were sprayed with herbicides and pesticides. Samples were collected and results associated with Site 32 indicated levels of chromium, lead, arsenic <sup>4</sup> and PAHs that exceeded BCT screening criteria <sup>3</sup> . This parcel has been selected for early removal. In October 1997, the BCT agreed that this parcel should change from an ECP Category 7 to a Category 6 as the parcel has been selected for early removal. 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. <sup>1</sup>

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

<sup>1</sup> 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.

<sup>2</sup> Records indicate that many buildings that stored perishables or textiles during the Depot's history may have been fumigated to control pests. Also, buildings that stored hazardous materials may have residual impacts from releases. The BCT determined that a representative number of buildings should be sampled for hazardous substances in the air. The BCT reviewed these air sampling results at the December 1997 BCT meeting and determined that no further action was warranted or required.

<sup>3</sup> BCT screening criteria were established by the BCT during the August 1997 BCT meeting and basically consist of the EPA Region III Risk Based Concentration table and, for some metals, regional background levels.

<sup>4</sup> Certain substances such as arsenic, chromium, cadmium, antimony and lead occur naturally. Even though analytical results indicated these levels exceeded BCT screening criteria, these levels appear fairly consistently across the Depot and are being regarded as naturally occurring.

## 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, general office and recreation.
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) 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

## Enclosure 5

### Environmental Protection Provisions

provisions of the Lease, the Government assumes no liability to the Lessee or its sublessees or licenses 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, 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. The Lessee, as directed by the Army, maintains a copy of all assignments or subleases and makes these documents available to the public upon request.

## Enclosure 5

### Environmental Protection Provisions

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 BRAC Environmental Coordinator. Except as such 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.



## Enclosure 5 Environmental Protection Provisions

### 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.

(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.

## Enclosure 5

### Environmental Protection Provisions

#### 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. NOTICE OF POLYCHLORINATED BIPHENYLS (PCBs) EQUIPMENT AND COVENANT:

(a) The Lessee is hereby informed and does acknowledge that equipment containing polychlorinated biphenyls (PCBs) might exist (overhead fluorescent light ballasts) on the Leased Premises, as described in the final base-wide EBS. All PCB-containing equipment has been properly labeled in accordance with applicable law and regulation. Any PCB contamination or spills related to such equipment has been properly remediated prior to execution of the Lease. The PCB equipment does not currently pose a threat to human health or the environment. In December 1993, 4 to 6 ounces of PCB-containing fluid was spilled on the south wall of Building 469 and soaked into the sheet rock wall and concrete. The BRAC Cleanup Team has reviewed the situation and has determined that no remedial action is necessary as the effected sheet rock and concrete were removed during sampling procedures immediately following the spill and no visual evidence remains.

(b) Upon request, the Army agrees to furnish to the Lessee any and all records in its possession related to such PCB equipment necessary for the continued compliance by the Lessee with applicable laws and regulations related to the use and storage of PCBs or PCB-containing equipment.

(c) The Lessee covenants and agrees that its continued possession, use and management of any PCB-containing equipment will be in compliance with all applicable laws relating to PCBs and PCB-containing equipment, and that the Army assumes no liability for the remediation of PCB contamination 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 sue, handling, management, disposition, or other activity causing or

## **Enclosure 5**

### **Environmental Protection Provisions**

leading to contact of any kind whatsoever with PCBs or PCB-containing equipment, whether the Lessee, its successors or assigns have been properly warned or failed to properly warn that individual(s) insured. The Lessee agrees to be responsible for any remediation of PCBs or PCB-containing equipment found to be necessary from its use and possession during the term of the Lease. This section and the obligations of the Lessee hereunder shall survive the expiration and termination of this Lease and any conveyance of the Leased Premises to Lessee.

19. 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.

20. The Lessee shall notify recreational users of the Golf Course area that pesticides and herbicides were historically applied to this property. This notification will be written (i.e. signs placed in common areas and/or printed handouts/flyers). Notifications will include a statement that further information is available from the Memphis Depot Caretaker located at 2163 Airways Boulevard, Building 144, or by calling (901) 544-0613. This provision applies to the following parcels of property: Parcels 3.6, 3.7, 3.8, 3.9, 3.10, 3.11 and that portion of Parcel 3.5 known as the Golf Course bounded on the south by N Street, on the west by 3rd Street, on the east by 1st street and on the north by J Street and K Street.

21. 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 and Responses for FOSL 8

Please find comments from the Environmental Protection Agency (EPA) and the Department of Army and responses from the Memphis Depot Caretaker for FOSL 8. The draft Finding of Suitability for Lease (FOSL) was initially distributed for review to the Army Materiel Command (AMC), the Defense Logistics Agency (DLA), the Tennessee Department of Environment and Conservation (TDEC) and the EPA for review and comment on December 31, 1998. Comments from the AMC, DLA and the EPA were received and comment responses provided in the draft final FOSL on March 25, 1999. The EPA offered further discussion on four of their original comments and the TDEC offered no comments.

#### EPA Region 4 (T. Ballard)

1. Region 4 is providing these comments on the FOSL expressly contingent upon final documents being provided to Region 4 by DoD. Lease terms are required to be provided together with attendant lease restrictions. In the instant case, lease restrictions have been attached to the FOSL, but the remaining lease terms have not been provided. We request a copy of the lease inclusive of all lease terms and lease restrictions both prior to and after the lease's execution to properly augment EPA Records and ensure the inclusion of any unresolved regulatory comments. We reserve the right to alter our opinion of the FOSL upon receipt of the entire lease.

**COMMENT NOTED.** The Depot Redevelopment Corporation will provide EPA a copy of all leasing documents as they are produced for the parcels included in this FOSL. Interim Master Lease No. DACA01-445 was entered into by the City of Memphis and the Department of Army. It has been provided to the EPA and contains lease terms.

2. Section 1 - Purpose. The notification by the DoD to the State should include the length of the lease. Please provide this information.

**COMMENT NOTED.** The information is contained in the Interim Master Lease No. DACA01-445 and has been provided to the State. The Interim Master Lease term began on September 1, 1997 and will end August 31, 2002. The lease allows the Lessee the option to renew the lease for three (3) successive 5-year terms. EPA has been provided a copy of this Interim Master Lease.

3. Section 2 - Property Description. The document was transmitted electronically, and the Site maps did not accompany the text. Please ensure that copies of the site maps will be included as Enclosure 1 when transmitting the final document.

**COMMENT NOTED.** Enclosure 1 site maps will be provided.

4. Section 3.5 - Asbestos. This section states that asbestos-containing material (ACM) is present in the listed buildings. It, further, states that "all friable asbestos that posed an unacceptable risk to human health has been removed or encapsulated." It would be more informative to specify, parcel by parcel, whether the ACM that remains on the property is non-friable, friable (good condition) or friable (encapsulated).

**COMMENT INCORPORATED.**

## Enclosure 6

### Regulatory/Public Comments and Responses for FOSL 8

5. Section 4 - Remediation. This section states, "Regulators have concurred with the Depot that the areas and buildings included in this Finding of Suitability to Lease 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." There are areas covered by this FOSL (e.g., Parcel 3) on which the Base Closure Team (BCT) continues to hold discussions about risk, exposure, etc. Therefore, EPA does not concur with this statement at this time. Please remove references that state or imply USEPA concurrence.

**COMMENT NOTED.** Results from the Final Streamlined Risk Assessment Parcel 3 Technical Memorandum (CH2M Hill, January 1999) will be included in Section 3.2 - Storage, Release or Disposal of Hazardous Substances. According to the assessment, which has been reviewed and accepted by the BRAC Cleanup Team, risks associated with Parcel 3 are either within or below acceptable exposure levels as defined by 40 CFR 300.430 (e)(2)(i)(A)(2). Information from the draft Baseline Risk Assessment for Golf Course Impoundments (Radian, December 1997) will also be included in Section 3.2. The BRAC Cleanup Team anticipates finalizing this assessment in the spring of 1999. This assessment indicates risks associated with consuming aquatic animals from either Lake Danielson or the Golf Course Pond were either within or below acceptable exposure levels as defined by 40 CFR 300.430 (e)(2)(i)(A)(2).

Upon further discussion of this comment, EPA will concur, for leasing purposes only, that the designated parcels are suitable for lease for uses consistent with the final Depot Redevelopment Plan. Any further EPA concurrence will have to be predicated on receipt and review of the final Main Installation baseline risk assessments scheduled to be completed by June 2000.

6. Section 8 - Finding of Suitability to Lease. CERCLA §120(h) allows the Army to out lease property on which hazardous substances have been stored, released or disposed without the Army's grant of the covenants mandated by §120(h)(3)(A)(ii), but only insofar as the Army, in consultation with the Administrator of the EPA, determines before leasing the property "that the uses contemplated for the lease are consistent with protection of human health and the environment, and that there are adequate assurances that the [Army] will take all remedial action referred to in subparagraph (A)(ii) that has not been taken on the date of the lease." (Emphasis added.) Please provide a statement that satisfies the requirement for "adequate assurances."

**COMMENT NOTED.** As provisions included in the Master Interim Lease and the Environmental Protection Provisions provided in this FOSL indicate, the Defense Logistics Agency has entered into a Federal Facility Agreement with the Environmental Protection Agency and the State of Tennessee dictating the completion of environmental restoration at this facility. Also, to transfer this property, which Congress has mandated for this property and which the Army has negotiated an economic development conveyance price with the Depot Redevelopment Corporation, all remedial actions must be in place or approved by the EPA Administrator. Congress, Department of Defense and Defense Logistic Agency have allocated funds to complete environmental restoration at this property.

## Enclosure 6

### Regulatory/Public Comments and Responses for FOSL 8

7. Enclosure 2 - Table 1, Description of Property. Parcel 3.10 (ECP Category 7) is described as "Suspected pistol range near Hole 9." Column 4 states, "In the late 1940s, this parcel was used as a pistol range." Please clarify whether the site is a suspected or confirmed pistol range. Please make a similar correction for this parcel as it appears in Tables 2 and 3.

**COMMENT INCORPORATED.** Will change the name of this parcel to "former pistol range near Hole 9." Information regarding this parcel was obtained via interviews with former employees and historical records. Sampling neither confirmed nor denied the presence of the pistol range.

8. Enclosure 2 - Table 1, Description of Property. Parcel 3.11 (ECP Category 7) is described as "Suspected flamethrower test site west of Hole 9." Column 4 states, "This area was used to test flamethrowers and fuel and to practice firefighting techniques after ignition of the fuel." Please clarify whether the site is a suspected or confirmed flamethrower test site. Please make a similar correction for this parcel as it appears in Tables 2 and 3.

**COMMENT INCORPORATED.** Will change the name of this parcel to "former flamethrower test site west of hole 9." Information regarding this parcel was obtained via interviews with former employees and historical records. Sampling neither confirmed nor denied the presence of the flamethrower test site.

9. Enclosure 2 - Table 1, Description of Property. Parcel 30.2 (ECP Category 7) is described as "Spill area between Buildings 925 and 949." Column 4 indicates that Building 925 was constructed over a portion of the spill area. These statements appear to be inconsistent. Please clarify. Please make a similar correction for this parcel as it appears in Tables 2 and 3.

**COMMENT INCORPORATED.** It should be noted that the environmental condition of property designation for Parcel 30.2 has been changed to a category 4. This can now be found on page 8 of Enclosure 2, as well as page 17 of Enclosure 3.

10. Enclosure 3 - Table 2, Notification of Hazardous Substance Storage, Release or Disposal. Whenever the United States enters into any contact for the sale or other transfer of real property which is owned by the United States and on which any hazardous substances was stored for one year or more, known to have been released, or disposed of, notice must be given of the type and quantity and such hazardous substance and of the time at which such storage, release or disposal took place, to the extent such information is available on the basis of a complete search of agency files. Further, the notice required by 40 CFR 373.1 must contain the following information:

a) The name of the hazardous substance; the Chemical Abstracts Services Registry Number (CASRN) where applicable; the regulatory synonym for the hazardous substance, as listed in 40 CFR 302.4, where applicable; the RCRA hazardous waste number specified in 40 CFR 261.30, where applicable; the quantity in kilograms and pounds of the hazardous substance that has been stored for one year or more, or known to have been released, or disposed of, on the property, and the date(s) that such storage, release, or disposal took place.

## Enclosure 6

### Regulatory/Public Comments and Responses for FOSL 8

b) The following statement, prominently displayed: "The information contained in this notice is required under the authority of regulations promulgated under 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h)."

Table 2 does not contain all the information required by 40 CFR 373. Please complete and/or provide an explanation why such information, including the CASRN, is not applicable.

**COMMENT NOTED AND UNRESOLVED.** This document is for the lease, not transfer or sale, of property. The transfer documents will contain the necessary information required by 40 CFR 373 regarding hazardous substances (as defined by CERCLA 101(14) and that appear at 40 CFR 302.4) including storage in quantities more than or equal to 1000 kilograms or the CERCLA reportable quantity as found in 40 CFR 302.3 and release or disposal of hazardous substances in quantities equal to or greater than the CERCLA reportable quantity as found in 40 CFR 302.3.

11. Enclosure 3 - Table 2, Notification of Hazardous Substance Storage, Release or Disposal. Column 2 (Name of Hazardous Substances) does not, in every instance, contain a listing of the hazardous substances that are described in Column 4 (Remedial Actions). Please ensure that Column 2 includes all of the hazardous substances identified in Column 4, as Column 2 is an easy reference for the more detailed textual material contained in Column 4. For example, Column 4 of Parcel 35.4 states, "results indicated levels of PAHs, methylene chloride, dieldrin, DDT, lead, chromium, cadmium, arsenic and antimony that exceed BCT screening criteria," while Column 2 lists only Paint and Paint-related products. Column 2 should contain all the hazardous substances referenced in Column 4. Errors of this nature are noted, in the order in which they appear in Table 2, for Parcels 23.10, 34.2, 25.1, 24.1, 15.5, 25.2, 28.2, 35.5, 3.5, 3.6, 3.7, 3.9, 3.10, 3.11, 13.5, 14.2, 15.3, 15.4, 15.6, 19.3, 20.5, 20.6, 21.5, 22.1, 22.2, 23.7, 23.11, 24.2, 27.1, 29.2, 29.3, 30.3, 30.5, 31.1, 32.3, 33.9, 35.1, 35.2, 35.3 and 35.4.

**COMMENT INCORPORATED.** Waste oil contaminants have been incorporated into Column 2, except where PAH levels appear to be the result of vehicle exhaust from nearby street. As such, they will not be included in Column 2 and a footnote will be added regarding these substances. Some substances such as arsenic, cadmium, chromium, lead and antimony found in sample results were not necessarily the result of storage, release or disposal, but are interpreted as naturally occurring levels. As such, they will not be included in Column 2 and a footnote will be added regarding these substances.

12. Enclosure 3 - Table 2, Notification of Hazardous Substance Storage, Release or Disposal. Parcels 15.5, 25.1, 25.2 should be added to Table 2. Information regarding these parcels is included in Tables 1 and 3, but because of containing reference to a storage, release or disposal of hazardous substance on one or both of those tables, should be included in Table 2.

**COMMENT NOTED.** All three parcels were included in Table 2. Parcels in Tables 2 and 3 have been put into numerical order.



## Enclosure 6

### Regulatory/Public Comments and Responses for FOSL 8

13. Enclosure 4 - Table 3, Notification of Petroleum Product Storage, Release or Discharge. Please correct the title of this table to read, "Notification of Petroleum Storage, Release or Disposal."

**COMMENT NOTED/INCORPORATED.** Department of Defense FOSL policy requires notification of petroleum and petroleum product activities. Army FOSL guidance indicates the name of this table is "Petroleum Product Storage, Release or Disposal". Will change "Discharge" to "Disposal."

14. Enclosure 4 - Table 3, Notification of Petroleum Product Storage, Release or Discharge. Parcel 35.2 omits from Column 2 the following petroleum products described in Column 4: Vehicle grease and lubricant.

#### **COMMENT INCORPORATED.**

15. Enclosure 4 - Table 3, Notification of Petroleum Product Storage, Release or Discharge. Parcels 15.6, 19.1, 19.2 and 19.3 should be added to Table 3, since they were subjected to a storage, release or disposal of petroleum products. See Tables 1 and 2 for this information.

**COMMENT NOTED.** All four parcels were in Table 3. Parcels in Tables 2 and 3 have been placed in numerical order.

16. Enclosure 5 - Environmental Protection Provisions. Paragraph 9 specifies that upon any assignment or sublease of the Leased Premises, the Lessee will provide to EPA and TDEC a copy of the agreement. While this language mirrors language in the Model Lease Provisions from the MOU, EPA suggests adding the Department of the Army to the list of recipients of sublease or assignment notification, in satisfaction of §IV(G) of the MOU, which states, "Copies of all subleases will be provided to the DoD Components with jurisdiction over the parcel, retained in the transaction file and made available to the public upon request." EPA, further, suggests that a sentence be added to the end of Paragraph 9, which reads, "Copies of any assignment or sublease of the Leased Premises will be retained in the Department of the Army transaction file and will be made available to the public upon request."

**COMMENT NOTED/INCORPORATED.** A sentence regarding the location of the "transaction file" will be added to Paragraph 9. The agency performing the Army's real estate management function for this property is the Mobile District of the U.S. Army Corps of Engineers. The Corps maintains their functional copy of all subleases in the Depot Redevelopment Corporation office on the Memphis Depot property. The Depot Redevelopment Corporation makes them available to the public for review during regular business hours.

17. Parcel 3.6, Lake Danielson, is classified ECP Category 7. To date, metals, pesticides and poly aromatic hydrocarbons (PAHs) have been identified in surface soils surrounding the lake, in storm water entering the lake and in lake sediments. Table 1 - Description of the Property said that efforts have been made to sample the tissue of edible fish, and that, to date, only inedible species have been found. A restriction against fishing in the lake until such time as sampling

## Enclosure 6

### Regulatory/Public Comments and Responses for FOSL 8

confirms that eating fish tissue does not pose a risk to human health or the environment should be placed in the Environmental Protection Provisions. It is unclear whether swimming or wading in the lake is inadvisable; if so, restriction on this and related types of activity should also be ensured. This restriction should remain in place until such time as it can be determined that past or future application of pesticides do not result in contamination of edible species.

**COMMENT NOTED.** Results from the Final Streamlined Risk Assessment Parcel 3 Technical Memorandum (CH2M Hill, January 1999) will be included in Section 3.2 - Storage, Release or Disposal of Hazardous Substances. According to the assessment, which has been reviewed and accepted by the BRAC Cleanup Team, risks associated with Parcel 3 are either within or below acceptable exposure levels as defined by 40 CFR 300.430 (e)(2)(i)(A)(2). Information from the draft Baseline Risk Assessment for Golf Course Impoundments (Radian, December 1997) will also be included in Section 3.2. The BRAC Cleanup Team anticipates finalizing this assessment in the spring of 1999. This assessment indicates risks associated with consuming aquatic animals from either Lake Danielson or the Golf Course Pond were either within or below acceptable exposure levels as defined by 40 CFR 300.430 (e)(2)(i)(A)(2).

Currently, a ban on fishing and swimming is in place and posted for Lake Danielson and the Golf Course Pond. The ban was implemented due to initial analytical results, concerns of possible injuries from unsupervised swimming as well as fishing on golf course fairways. Information regarding the current ban has been included with the above mentioned risk assessment information in Section 3.2.

18. The FOSL is acceptable as drafted save for its draft status and the incorporation of EPA comments. In summary, if the military chooses not to respond to these comments, USEPA's comments should be characterized as "unresolved regulatory comments" pursuant to DoD policy on FOSLs, and have said comments placed as an attachment to the lease agreement. EPA requests executed leases by the lessee to ensure the inclusion of any unresolved regulatory comments and in order to properly augment our records. Lastly, DoD should be aware that failure to comply with the above-delineated CERCLA requirements (under comments 10 and 11), may subject the Facility to citizen suits under CERCLA § 310 for "...failure to perform specified, non-discretionary duties.

EPA's comment on whether the uses contemplated for the lease are consistent with protection of human health and the environment assumes that nothing in the remainder of the lease will contradict the lease terms provided during this review. EPA is in possession of the Interim Master Lease between the Department of the Army and the City of Memphis and Shelby County, Tennessee (assigned to DRC). If the Interim Master Lease is the controlling Master Lease over this leasing transaction, a statement to this effect should be made in the FOSL. EPA expects to attach any of its comments, to the extent it considers them significant and they have not been incorporated into or addressed by the final FOSL and/or Lease, as an appendix to the documents.

**Enclosure 6**  
**Regulatory/Public Comments and Responses for FOSL 8**

**COMMENT NOTED.** All comments received and response to comments are attached to this FOSL at Enclosure 6. A statement regarding the Interim Master Lease will be included in Section 1 - Purpose.

## **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

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

## Enclosure 7

### References

#### 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/swerffir/brac.htm>

##### 3. Department of the Army

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 of Process.  
<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](http://www.ncts.navy.mil/homepages/navfac_es/bcp.htm)

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