

DRAFT FINAL



**FINDING OF SUITABILITY TO TRANSFER
(FOST)
FORT MCPHERSON, GEORGIA**

AMENDMENT #1

FORT MCPHERSON

**MCPHERSON IMPLEMENTING LOCAL REDEVELOPMENT AUTHORITY
PROPERTY**

**Prepared by
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ENVIRONMENTAL OFFICE
FORT MCPHERSON, GEORGIA**

November 2014

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**FINDING OF SUITABILITY TO TRANSFER (FOST)
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1. Purpose

The purpose of this Amendment is to update the Finding of Suitability to Transfer (FOST) dated November 2013 to include an additional 1.1 acres of property to be transferred and provide additional supporting information.

2. Amendment

The Fort McPherson, Georgia FOST dated November 2013 is amended as follows to include Installation Restoration Program (IRP) site FTMP-16:

- Section 2.0 Property Description – In the third paragraph, replace “434 acres of land” with “435 acres of land”.
- Section 3.0 Environmental Documentation – Add the following document:
 - Update to the U.S. Army BRAC 2005 Environmental Condition of Property Report, Fort McPherson, GA, Final, dated 25 January 2007 (*Wenck Associates, 2014*)
- 4.0 Environmental Condition of Property – Under ECP Category 3 (within the listing of parcels), replace “There are no Category 3 sites” with “FTMP-16, Building 356, Pesticide Facility 1”.
- Section 4.1 Environmental Remediation Sites – Revise the first sentence to read, “There are two Installation Restoration Program (IRP) sites located on the Property.” Also, add the following text under subsection 4.1.2:
 - **4.1.2 FTMP-16, Pesticide Facility 1**

Description: Former Building 356, referred to as Pesticide Facility 1 (PF1), was located in the former Directorate of Public Works complex approximately 230 feet east southeast of Building 363. Building 356 was constructed in 1941 and according to a 1958 survey was used for gun soldering, machining and grinding, wood working, spray painting and welding. The building was subsequently converted for use as a pesticide storage and mixing area and was demolished in 2001. According to historical accounts, pesticides were loaded from and stored in Building 356. The ECP Report classified the building as a recognized environmental condition because

of insufficient data to confirm or deny the presence of contamination from past pesticide mixing practices (Shaw Environmental, 2007).

Previous Investigations: The 1990 U.S. Army Environmental Hygiene Agency (1990) Environmental Program Review and the 1996 Environmental Compliance Assessment System external assessment (U.S. Army Center for Health Promotion and Preventive Medicine, 1996) documented inadequacies both in the building's ventilation and the pesticide storage facility. No maps or photographs were included in the documents to identify the specific locations of the observed problems.

During the 2007 Site Investigation (SI), 16 soil samples were collected from 10 locations within and outside of the former Building 356 footprint (Shaw Environmental, 2009). Surface samples (0 to 1 foot) and subsurface samples (1 to 2 feet) were analyzed for volatile organic compounds (VOCs), organochlorine pesticides, organophosphorus pesticides and metals. The analytical data were compared to EPA Region 9 Residential Preliminary Remediation Goal (PRG) screening values and the metals data were compared to Fort McPherson background values. Of the 23 metals detected, five soil samples exceeded the regulatory and background criteria for arsenic, copper, lead, manganese and thallium. Of the eight pesticides detected, only dieldrin exceeded the regulatory criterion. No VOCs were reported in the soil samples above regulatory criteria.

Additional soil sampling was conducted in 2008 to characterize the arsenic, copper, lead and dieldrin contamination. Samples were field-screened for lead and copper. Confirmatory samples were analyzed for arsenic, copper, lead and dieldrin in a fixed-base laboratory. Copper and lead exceeded the screening criteria in one surface sample. Arsenic exceeded the Residential PRG at 11 sampling locations. Dieldrin was not detected above the Residential PRG in the samples.

Based on the comparison criteria, lead and copper contamination were limited to surface soil and localized on the eastern portion of the site. Manganese and thallium contamination were limited to the subsurface soil at one location on the eastern portion of the site. Arsenic was detected above the Residential PRG in surface and subsurface soil samples throughout the site. Dieldrin contamination was limited to surface soil and localized in the same areas as the lead and copper contamination. The SI Report recommended a limited surface soil removal action for contamination on the eastern portion of the site and a risk assessment for the exceedances of background values.

On March 8, 2013, the Army collected six surface soil samples (0 to 1-foot interval) in the vicinity of former Buildings 356 and 359. Nine organochlorine pesticides were reported in the samples; however, only dieldrin was detected above regulatory criteria. Three of the samples exceeded the Soil Regional Screening Level (RSL), Industrial for dieldrin of 0.11 mg/kg. Four of the samples exceeded the Soil RSL, Residential of 0.03 mg/kg. The dieldrin exceedances in the surface soil samples ranged from 0.29 to 0.37 mg/kg. Further characterization of the dieldrin exceedances

was recommended. Based on the results of this investigation, the site was designated as FTMP-16.

An Extended Site Investigation (ESI) was conducted on August 6, 2014 to delineate the pesticide and arsenic concentrations in soil. A total of 32 soil borings were advanced in a grid pattern across the site area to bracket previous sampling locations. A total of 105 soil samples, including duplicates, were collected from three depth intervals in each boring: 0 to 1 foot, 2 to 3 feet and 4 to 5 feet. The soil samples were analyzed for pesticides and arsenic. The analytical results were evaluated against applicable Environmental Protection Agency (EPA) Residential RSLs and Type IV Risk Reduction Standards (RRS)¹. The Type IV RRSs are the regulatory criteria used because the future reuse of this area will be for industrial purposes. Three monitoring wells were installed to total depths of 50 feet below ground surface. The wells were dry upon installation and were not used.

None of the soil samples met or exceeded Type IV RRSs for the tested analytes. The arsenic concentrations in all but one sample (FTMP-16-25C, 4 to 5 feet) exceeded the Residential RSL of 670 µg/kg. Dieldrin exceeded the Residential RSL of 33 µg/kg in three of the soil samples with sample concentrations ranging from 56 to 130 µg/kg. Sample FTMP-16-23A (0 to 1 foot) met the Residential RSL of 1,800 µg/kg for chlordane. This concentration was vertically delineated by sample FTMP-16-23C (3 to 5 feet) in which chlordane was not detected above the method detection limit of 3.4 µg/kg. The samples were subsequently analyzed for copper and lead after project personnel reviewed an earlier recommendation to conduct this additional sampling. Copper in the ESI soil samples ranged from 17 to 220J mg/kg and lead ranged from 13J to 240 mg/kg with no exceedances of regulatory criteria. No further action is recommended for this site.

- Section 8.0 National Environmental Policy Act (NEPA) Compliance – Revise the second sentence of this section as follows: “The results of this analysis are documented in the *Environmental Impact Statement for Disposal and Reuse of Fort McPherson, Georgia*, November 2010; the *Record of Decision*, March 2011; and the *Record of Environmental Consideration*, November 2014.
- Enclosure 1 – Figure 2, Environmental Sites Map, has been replaced with Enclosure 1 – Figure 1 in this FOST Amendment. The figure has been retitled as Parcel Map and updated to show the change in ECP parcel designation for FTMP-16 from 16(7)HS/HR(P) to 16(3)HS/HR.
- Enclosure 2, Environmental Documentation – Add the following references to Enclosure 2 of the FOST:

¹ Relevant Type IV RRSs are 69,250 µg/kg for chlordane, 144 µg/kg for dieldrin and 41,000 µg/kg for arsenic. EPA Residential RSLs are 1,800 µg/kg for chlordane, 33 µg/kg for dieldrin and 670 µg/kg for arsenic.

- Department of the Army, Savannah District. 2013. *Fort McPherson – Pesticide Facility 1 and Pesticide Facility 2 Confirmatory Sampling Results*. Draft Memorandum. June 14.
 - U.S. Army Corps of Engineers, Savannah District. 2014. *Sampling & Analysis Plan for FTMP-16, Fort McPherson, Georgia*. July.
 - TestAmerica Laboratories, Inc. 2014. *Analytical Report for FTMP-16 Subsurface Investigation, Test America Job ID: 680-104115-1*. August 28.
 - TestAmerica Laboratories, Inc. 2014. *Analytical Report for FTMP-16 Subsurface Investigation, Test America Job ID: 680-104115-2*. September 19.
 - Wenck Associates. 2014. Update to the U.S. Army BRAC 2005 Environmental Condition of Property Report, Fort McPherson, GA, Final, dated 25 January 2007. November 5.
- Enclosure 3 – Table 1, Description of Property – Table 1 of the FOST has been updated to include site information for FTMP-16. This information is provided as Enclosure 2 – Table 1 in this FOST Amendment.

All remaining provisions of the FOST remain the same.

3. Finding of Suitability to Transfer

Based on the above information, I conclude that all removal or remedial actions necessary to protect human health and the environment have been taken and the Property is transferable under CERCLA section 120(h)(3). In addition, all Department of Defense requirements to reach a finding of suitability to transfer have been met, subject to the terms and conditions set forth in the attached Environmental Protection Provisions that shall be included in the Deed for the Property. The Deed will also include the CERCLA 120(h)(3) Notice, Covenant, and Access Provisions and Other Deed Provisions. Finally, the hazardous substance notification (Table 2) shall be included in the Deed as required under the CERCLA Section 120(h) and DOD FOST Guidance.

Thomas E. Lederle
Chief, Base Realignment and Closure Division

2 Enclosures
Encl 1 – Figure 1 – Parcel Map
Encl 2 – Table 1 – Description of Property

ENCLOSURE 2

TABLE 1 – DESCRIPTION OF PROPERTY

Building Number and Property Description	ECP Parcel Designation	Condition Category	Remedial Actions
IRP SITES			
FTMP-16, Pesticide Facility 1 (Former Building 356)	16(3)HS/HR	3	1990 – Environmental Program Review conducted. 1996 – ECAS external assessment conducted. 2007-2008 – SI conducted in two phases (first phase: 10 surface soil samples/6 subsurface soil samples; second phase: 16 surface soil samples/14 subsurface soil samples). 2013 – Surface soil sampling conducted (6 samples). Site added to the IRP for further investigation as FTMP-16. 2014 – ESI conducted on August 6, 2014 (32 soil borings, 105 soil samples, 3 monitoring wells – wells dry). NFA is recommended for FTMP-16.