DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER

PRFTA-02 Former Building 109 Incinerator

Combat Support Training Center Camp Parks
Dublin, California

September, 2015

Prepared by: U.S. Army Corps of Engineers, Sacramento District

Prepared for: USAG Camp Parks; US Army Environmental Command

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DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER (FOST)

Combat Support Training Center Camp Parks, Dublin, Contra Costa County, California

PRFTA-02 Former Building 109 Incinerator

September, 2015

Prepared by:

UNITED STATES ARMY CORPS OF ENGINEERS
SACRAMENTO DISTRICT
1325 J Street
Sacramento, CA 95814

Prepared for:

US ARMY GARRISON CAMP PARKS
620 6th St,
Dublin, CA 94568

UNITED STATES ARMY ENVIRONMENTAL COMMAND
2450 Connell Road, Building 2264
Fort Sam Houston, TX 78234

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DRAFT FINAL FINDING OF
SUITABILITY TO TRANSFER (FOST)
Combat Support Training Center Camp Parks
PRFTA-02 Former Building 109 Incinerator
September 2015

1. PURPOSE

The purpose of this Finding Of Suitability To Transfer (FOST) is to document the environmental suitability of certain parcels or property at the United States Army Combat Support Training Center, Camp Parks (Parks) for transfer to the Dublin Crossing CP, Limited Liability Corporation, consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy. In addition, the FOST includes the CERCLA Notice, Covenant, and Access Provisions and other Deed Provisions and the Environmental Protection Provisions (EPPs) necessary to protect human health or the environment after such transfer.

2. PROPERTY DESCRIPTION

Property consists of approximately 3.980 acres, which includes no current buildings and no acres of undeveloped land. The property was previously used as an industrial incinerator.

The PRFTA-02 site has been satisfactorily cleaned to standards consistent with commercial /industrial land use, subject to conditions and requirements set by the Record of Decision (encl 13). The Army intends to transfer the property that includes the PRFTA-02 site to a private developer with the understanding that additional investigations and remedial work will be completed to close the site with a less restrictive land use designation. See the attached Land Use Control Implementation Plan, (USACE, 2015) and Closure Certification (Enclosure 17). The property is intended to be transferred as a mixed-use master-planned community[1] and is consistent with the intended reuse of the property as set force in the Dublin Crossing Final Specific Plan (RBF, 2013) and Dublin Crossing Final Environmental Impact Report (RBF, 2013). A site map of the property is attached (Enclosure 1).

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the property was made based upon the Environmental Baseline Survey (USACHPPM, 2002e) and Environmental Condition of Property (ECP) (USACHPPM 2011) and the ECP Recertification Memo (Parks CTSC, 2015). The information provided is a result of a complete search of agency files during the development of these environmental surveys.

[1] The proposed use of PRFTA-2 is open space. A new human health risk assessment will be required for specific recreational uses.

A complete list of documents providing information on environmental conditions of the Property is attached (Enclosure 2).

4. ENVIRONMENTAL CONDITION OF PROPERTY

The DOD Environmental Condition of Property (ECP) categories for the property are as follows:

ECP Category 4: PRFTA-2 Former Building 109 Incinerator

A summary of the ECP Categories for specific buildings, parcels, or operable units and the ECP category definitions is provided in Table 1 – Description of Property (Enclosure 3).

4.1. Environmental Remediation Sites

There was one remediation site located on the Property. A summary of the environmental remediation site on the property is as follows:

Soil removal for dioxins and toxic metals to state environmental screening levels for industrial or commercial use and groundwater monitoring. The Army and the DTSC must be notified in advance of any proposed changes to land use or groundwater use.

The property was not remediated to levels suitable for unrestricted use. The deed will include the following land use restrictions in accordance with the Record of Decision (URS, 2011, Section 2.12.5 page 2-61):

No residential development, play areas or day care facilities

See the Final Land Use Control Implementation Plan (USACE, 2015) for additional information. A summary of the environmental remediation sites is provided in Table 2 – Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 4).

4.2. STORAGE, RELEASE, OR DISPOSAL OF HAZARDOUS SUBSTANCES

Hazardous substances (toxic metals and dioxins) were stored for one year or more and released or disposed of on the property in excess of reportable quantities specified in 40 CFR Part 373. All hazardous substance storage operations have been terminated on the property. Hazardous substances were released in excess of the 40 CFR 373 reportable quantities at the following sites:

PRFTA-2 Former Building 109 Incinerator

The release or disposal of these hazardous substances was remediated as part of the Installation Restoration Program (IRP). See Section 4.1 Environmental Remediation Sites for

additional information. 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 4). The CERCLA 120(h)(3) Notice, Description, and Covenant at Enclosure 5 will be included in the Deed.

4.3. PETROLEUM AND PETROLEUM PRODUCTS

4.3.1. UNDERGROUND AND ABOVE-GROUND STORAGE TANKS (UST/AST)

• Former **UST/AST Sites** - There was one underground storage tank (UST) on the property that has been removed or closed in place. Petroleum product releases occurred at the following sites: PRFTA-02. The release of these petroleum products was remediated at the time of the release or as part of UST/AST closure. See the Removal Action Completion Report, Installation Restoration Program Site PRFTA-02 (URS, 2014a) for additional information.

A summary of the UST/AST petroleum product activities is provided in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 5).

4.3.2. Non-UST/AST Storage, Release, or Disposal of Petroleum Products

There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on the property.

4.4. POLYCHLORINATED BIPHENYLS (PCB)

There is no evidence that PCB-containing equipment is located or was previously located on the property.

4.5. ASBESTOS

There is no evidence that buildings or structures with ACM are located on the property.

4.6. LEAD-BASED PAINT (LBP)

No buildings on the property are presumed to contain lead-based paint.

4.7 INDOOR FIRING RANGES

There is no evidence that buildings or structures with lead-contaminated dust from a former indoor firing range are located on the property.

4.8. RADIOLOGICAL MATERIALS

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

4.9. RADON

Radon surveys were conducted in 19 buildings on Camp Parks. Radon was not detected at above the EPA residential action level of 4 picocuries per liter (pCi/L) in these buildings. The study concluded that radon in indoor air is not an issue at Camp Parks.

4.10. MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

Based on a review of existing records and available information, there is no evidence that Munitions and Explosives of Concern (MEC) are present on the property. . In addition, available documentation indicates no areas within the proposed transfer area were ever used as ranges, training areas, or for other purposes that might indicate MEC is present. The term "MEC" means military munitions that may pose unique explosives safety risks, including: (A) unexploded ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (B) discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (C) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

4.11. OTHER PROPERTY CONDITIONS

There are no other hazardous conditions on the property that present an unacceptable risk to human health and the environment.

5. ADJACENT PROPERTY CONDITIONS

There are no conditions adjacent to the property that present an unacceptable risk to human health and the environment.

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

There are no environmental remediation orders or agreements applicable to the property being transferred. The deed will include a provision reserving the Army's right to conduct remediation activities if necessary in the future (Enclosure 6).

7. REGULATORY/PUBLIC COORDINATION

The U.S. EPA Region 9, the California Department of Toxic Substances Control and California Regional Water Quality Control Board San Francisco Bay Region, and the public were notified of the initiation of this FOST. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate. A copy of the regulatory/public comments and the Army Response ***will be*** included at Enclosure 8 and 9.

[Editorial Note – Revise this section after the public comment period is completed to reflect whether any regulatory/public comments were received and an Army Response was prepared.**]**

8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts associated with the proposed property transfer have been analyzed in accordance with National Environmental Policy Act (NEPA). The results of this analysis are documented in the Final Environmental Impact Statement and ROD (signed on 28 October 2009) (Department of the Army, 2009) and the Dublin Crossing Final Environmental Impact Report (RBF, 2013).

The NEPA analysis identified several mitigation and monitoring commitments. These encumbrances and the corresponding mitigation and monitoring procedures, are presented in Enclosure 11.

9. 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 suitable for commercial/industrial use 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.

Reviewed by:

_____

Gary Houston
Environmental Protection Officer

Approved by:

_____ _____

Date

ANDREW W. JONES
LTC, CA, U.S. Army
Commanding

_____ _____

Date

MICHAEL B. BAILEY
LTC, MP, U.S. Army
Commanding

_____ _____

Date

THOMAS J. SCHOENBECK
Region Director, IMCOM Central

18 Enclosures

Encl 1 -- Site Map of Property
Encl 2 -- Environmental Documentation
Encl 3 -- Table 1 -- Description of Property
Encl 4 -- Table 2 -- Notification of Hazardous Substance Storage, Release, or Disposal
Encl 5 – Table 3 – Notification of Petroleum Storage, Release or Disposal
Encl 6 – CERCLA Notice, Covenant, and Access Provisions and Other Deed Provisions
Encl 7 -- Environmental Protection Provisions
Encl 8 -- Notices
Encl 9 -- Regulatory/Public Comments
Encl 10 -- Army Response
Encl 11 – Mitigation & Monitoring Commitments
Encl 12 – FS-PP Concurrence Letter
Encl 13 – ROD Concurrence Letter
Encl 14 – LUCIP Concurrence Letter
Encl 15 – Remedial Action Completion Report Concurrence Letter
Encl 16 – Groundwater Monitoring Well Removal Concurrence Letter
Encl 17 – Closure Certification Letter
Encl 18 – Environmental Condition of Property Recertification Letter

ENCLOSURE 1
SITE MAP OF PROPERTY
INCLUDING LEGAL DESCRIPTION

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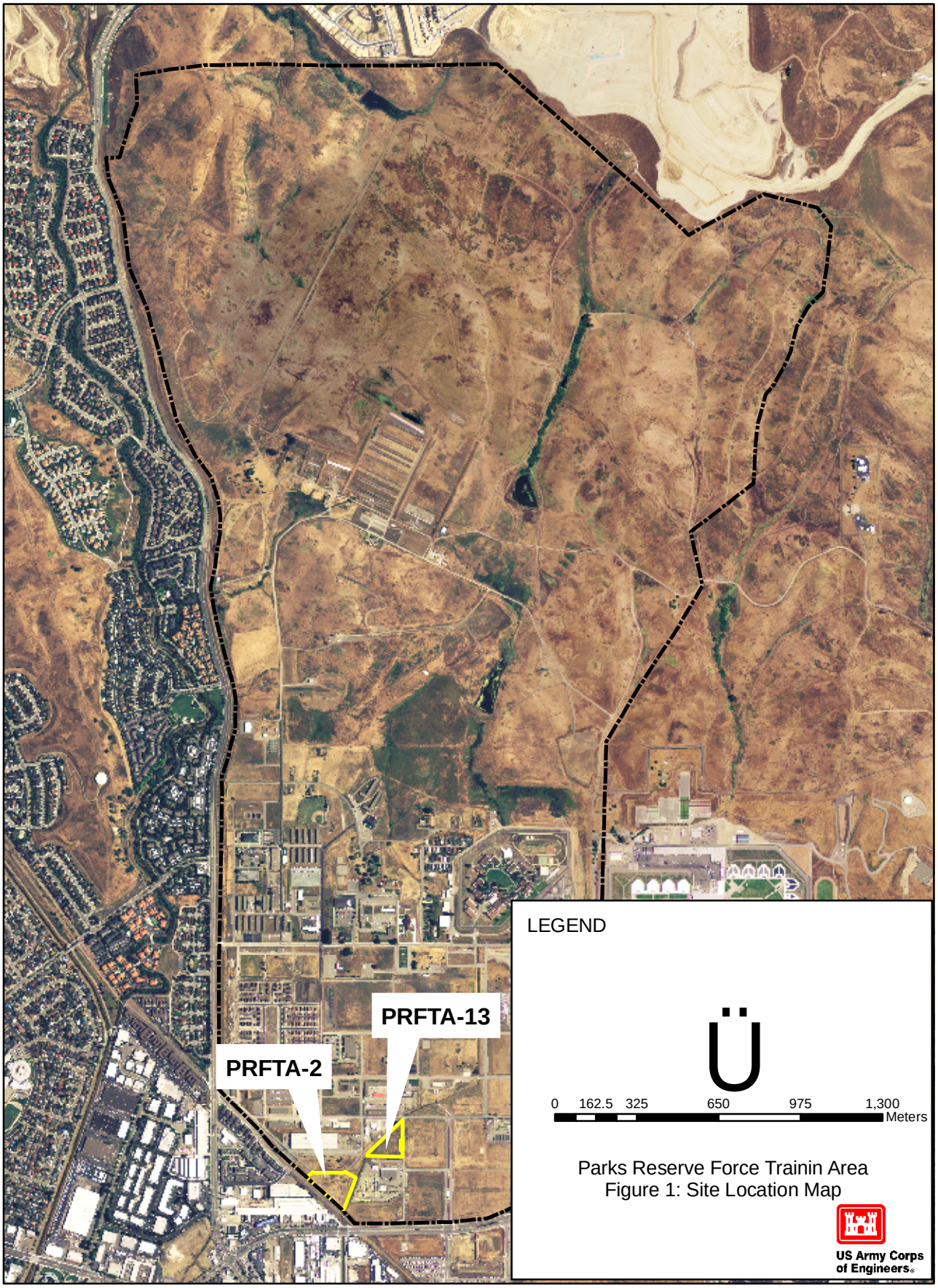

Date: 20 September 2012
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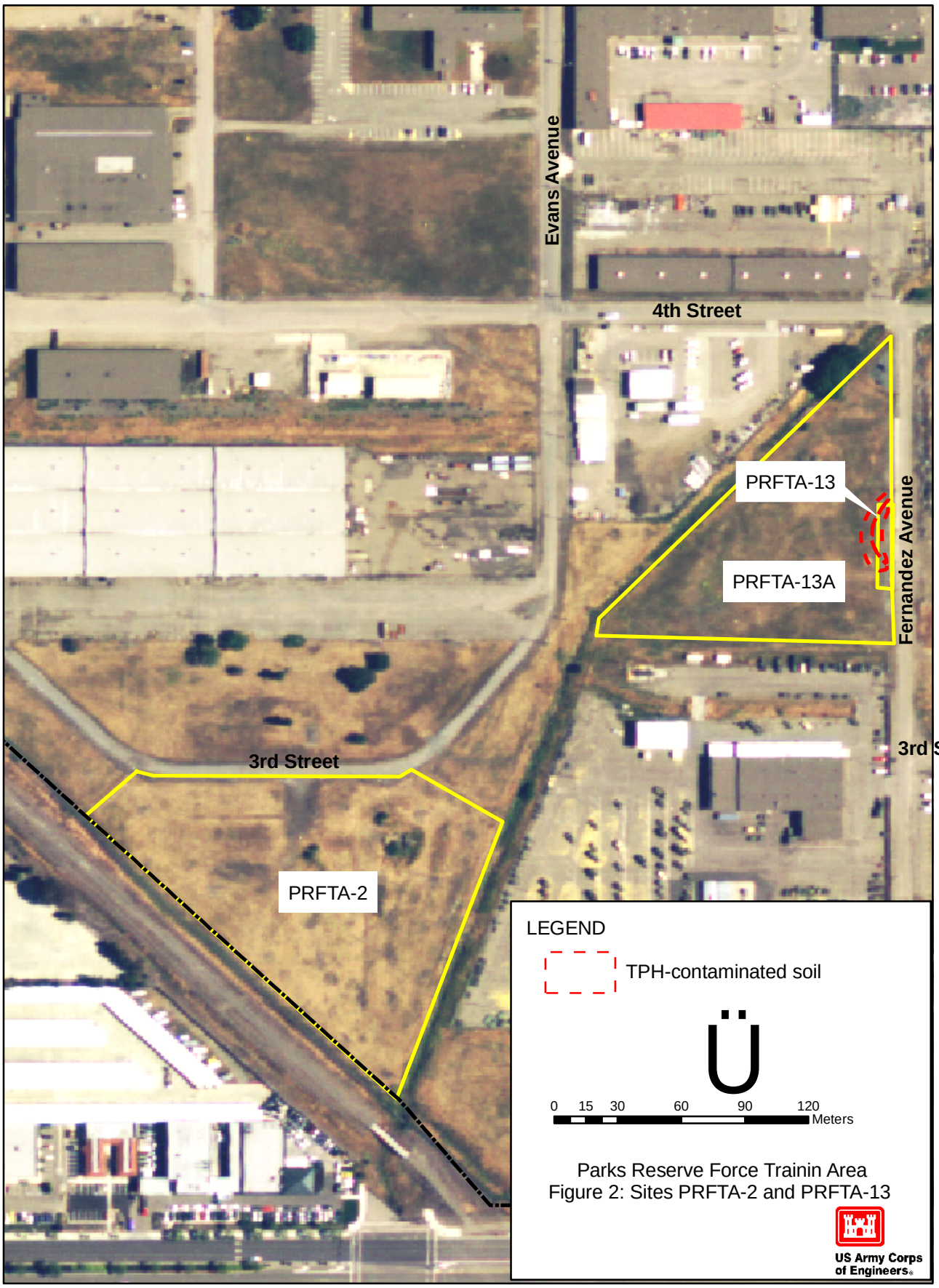

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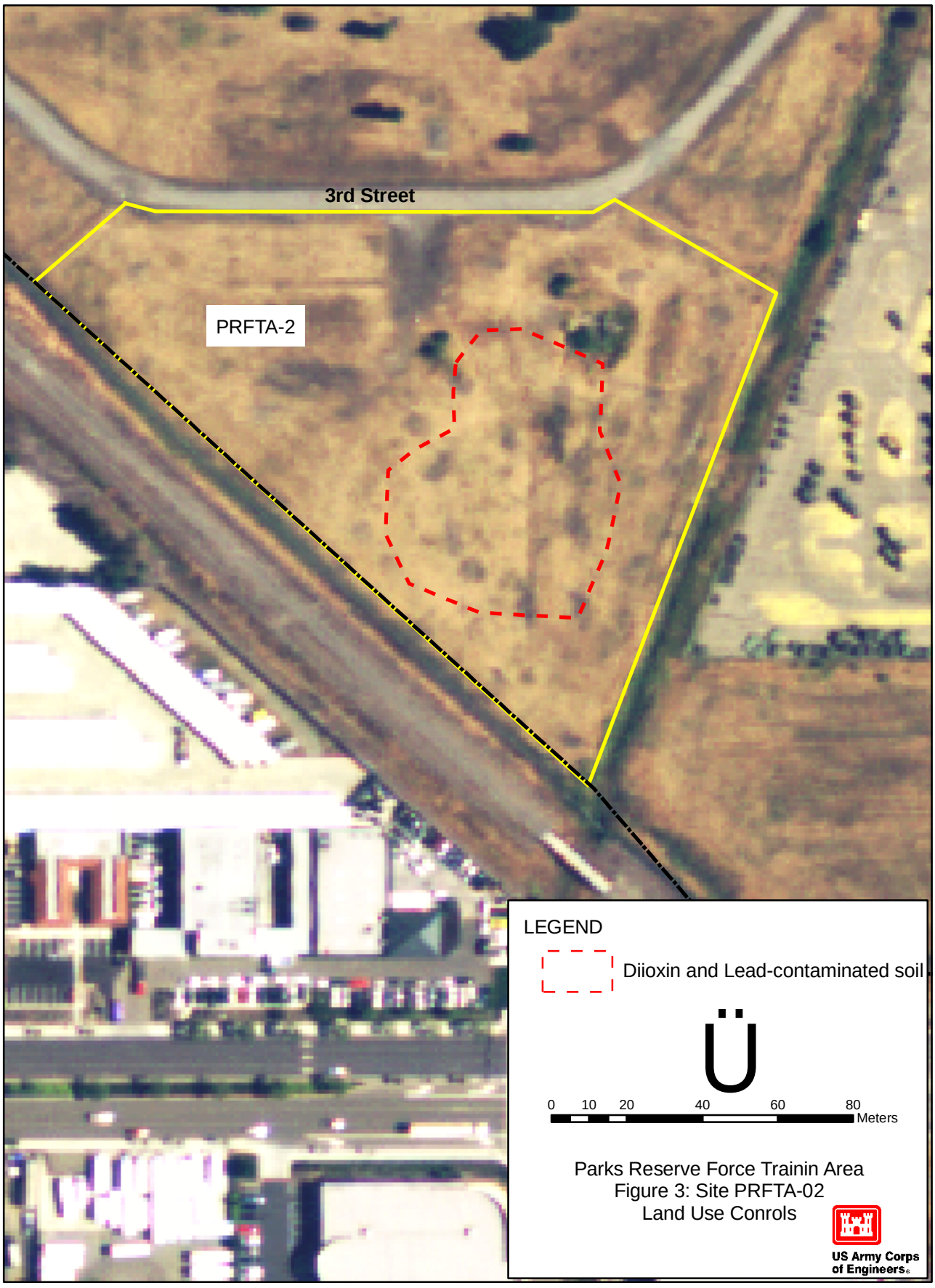

Date: 20 September 2012
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Exhibit A
Legal Description

All that portion of real property located within the boundary of the Camp Parks, California Reserve Forces Training Center and also being located in the City of Dublin, County of Alameda and State of California described as follows:

Commencing at a Standard US Coast and Geodetic Survey Brass Cap set in a concrete post and stamped PFE-4 having NAD 1983 California Zone III State Plane Coordinates of Northing: 2085639.94 feet , Easting: 6156034.70 feet; thence S 12°06'25" W, a distance of 1949.15 feet to the **Point of Beginning**, said Point of Beginning being a 5/8" rebar with USACE cap located 140 feet plus or minus southeasterly of 3rd Street and 680 feet plus or minus northerly of Dublin Blvd:

Thence along the arc of a curve turning to the right, with a chord bearing of S 22°47'04" E , a chord length of 17.16 feet, and a radius of 12.00 feet to a 5/8" rebar with USACE cap; thence S 22°50'38" W, a distance of 458.48feet to a 5/8" rebar with USACE cap; thence N 46°20'28" W, a distance of 385.80 feet to a 5/8" rebar with USACE cap; thence along the arc of a curve turning to the right, with a chord bearing of N 43°46'55" W, a chord length of 254.33 feet, and a radius of 2473.65 feet to a 5/8" rebar with USACE cap; thence N 46°07'40" E, a distance of 32.26 feet to a 5/8" rebar with USACE cap; thence N 57°50'21" E, a distance of 80.11 feet to a Cross Spike with USACE Washer; thence along the arc of a curve turning to the left, with a chord bearing of S 77°52'04" E , a chord length of 62.94 feet, and a radius of 171.00 feet to a Cross Spike with USACE Washer; thence S 88°28'21" E a distance of 298.66 feet to a Cross Spike with USACE Washer; thence along the arc of a curve turning to the left, with a chord bearing of N 80°41'28" E , a chord length of 62.05 feet, and a radius of 165.00 feet to a Cross Spike with USACE Washer; thence S 55°54'27" E a distance of 87.36 feet to a 5/8" rebar with USACE cap; thence S 68°24'46" E a distance of 44.85 feet to the Point of Beginning. Said Point of Beginning bears N 88°46'50" W, a distance of 1574.53 feet a Standard US Coast and Geodetic Survey Brass Cap set in a concrete post and stamped PFS-2 having NAD 1983 California Zone III State Plane Coordinates of Northing: 2083193.30 feet , Easting: 6157091.24 feet.

Containing 173341 Square Feet and 3.980 Acres more or less.

All distances in the above legal description are grid. To obtain ground distance, multiply by a combined factor of 1.000083.

Kevin D. Burgess Ca. LS 6718
Date: 07/09/2012

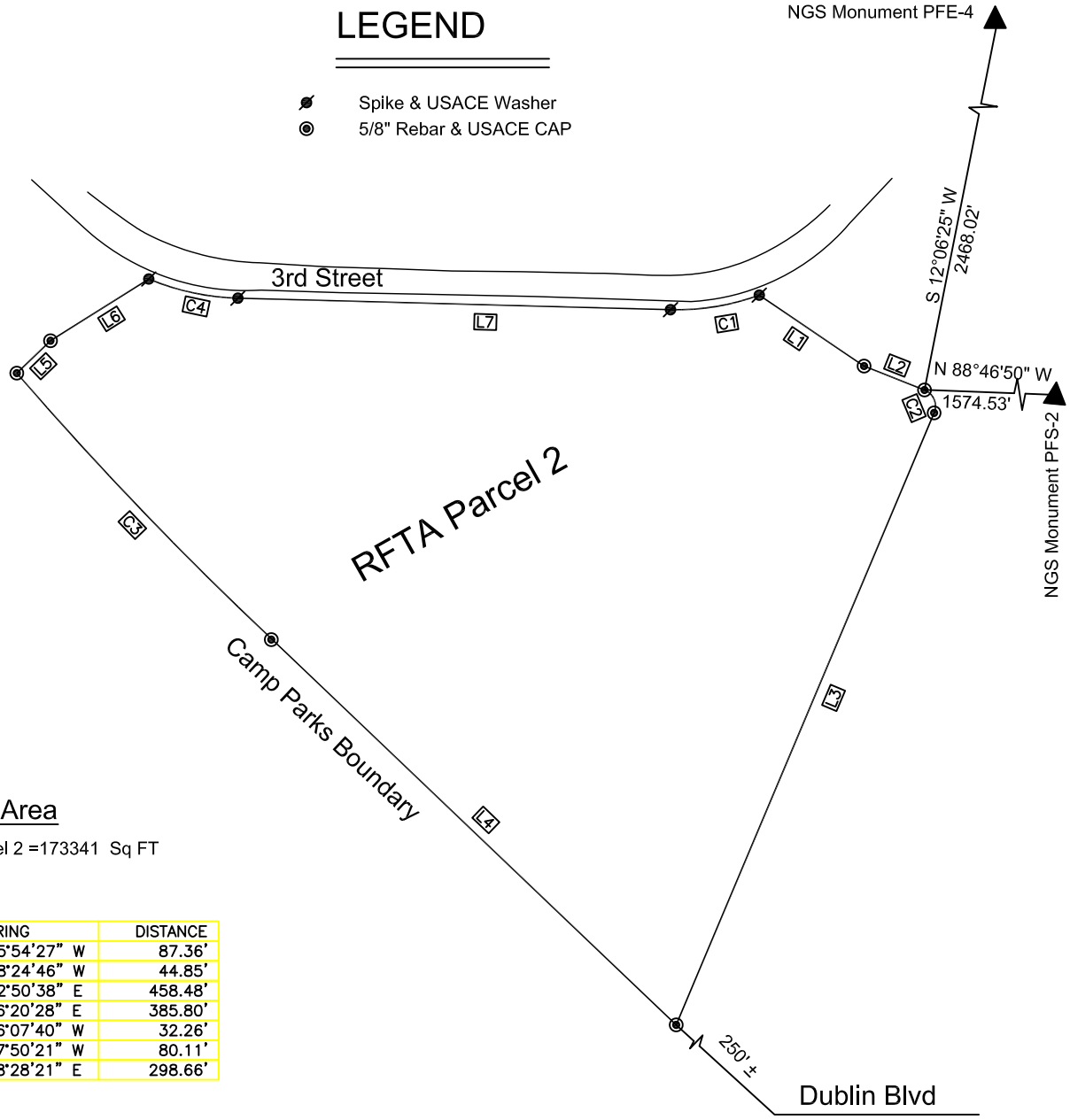
LEGEND

Spike & USACE Washer

5/8" Rebar & USACE CAP

N

NTS



Parcel Area

Area of Parcel 2 =173341 Sq FT

3.980 Acres

LINE	BEARING	DISTANCE
L1	N 55°54'27" W	87.36'
L2	N 68°24'46" W	44.85'
L3	N 22°50'38" E	458.48'
L4	S 46°20'28" E	385.80'
L5	S 46°07'40" W	32.26'
L6	S 57°50'21" W	80.11'
L7	S 88°28'21" E	298.66'

CURVE	RADIUS	ARC LENGTH	CHORD LENGTH	CHORD BEARING	DELTA ANGLE
C1	165.00'	62.42'	62.05'	N 80°41'28" E	21°40'33"
C2	12.00'	19.12'	17.16'	N 22°47'04" W	91°17'37"
C3	2473.65'	254.45'	254.33'	S 43°46'55" E	05°53'37"
C4	171.00'	63.30'	62.94'	S 77°52'04" E	21°12'30"

LICENSED LAND SURVEYOR
KEVIN D. BURGESS
No. 6718
STATE OF CALIFORNIA

Note: Distance Shown are Grid per NAD 1983
California Zone III Conversion Factor = 0.999917

U.S. Army Corps of Engineers
Sacramento District
1325 'J' Street, Sacramento, Ca. 95814

Drawn: KDB | Date: 7/06/12 | Scale: NTS

Exhibit B

Camp Parks RFTA Site 2

Site 2 Boundary

City of Dublin
County of Alameda
State of California

On-Site Control Points

POINT	NORTHING	EASTING	ELEVATION	DESCRIPTION
200	2083456.392	6155568.453	336.84	PK Nail & Washer
201	2083296.279	6155393.997	336.94	PK Nail & Washer

The Horizontal Datum for this survey is NAD 83 and the Vertical Datum is NGVD 1929 and are based on US Army Corps of Engineers Valuations of NGS Monument PFE 4. N=2085639.94, E=6156034.70, Elev=370.88 California State Plane Coordinate System Zone III

Distances shown are Grid Conversion Factor = 0.999917

Parcel Area

Area of Parcel 2 =173341 Sq FT
3.980 Acres

LINE	BEARING	DISTANCE
L1	N 55°54'27" W	87.36'
L2	N 68°24'46" W	44.85'
L3	N 22°50'38" E	458.48'
L4	S 46°20'28" E	385.80'
L5	S 46°07'40" W	32.26'
L6	S 57°50'21" W	80.11'
L7	S 88°28'21" E	298.66'

CURVE	RADIUS	ARC LENGTH	CHORD LENGTH	CHORD BEARING	DELTA ANGLE
C1	165.00'	62.42'	62.05'	N 80°41'28" E	21°40'33"
C2	12.00'	19.12'	17.16'	N 22°47'04" W	91°17'37"
C3	2473.65'	254.45'	254.33'	S 43°46'55" E	05°53'37"
C4	171.00'	63.30'	62.94'	S 77°52'04" E	21°12'30"

RFTA Parcel 2

Asph Road
Third Street
Control Pt. No. 200
Control Pt No. 201
PP
SIGN
Drainage Ditch
Chain Link Fence
Test Hole CPT No. 8
Bush
Conc Debris
X 333.87
X 334.10
X 334.33
X 335.02
X 334.69
X 335.08
X 334.37
X 333.44
X 335.46
X 334.49
X 333.59
X 335.55
X 334.56
X 333.69
X 332.72
X 335.69
X 335.81
X 336.91
X 336.44
X 336.72
X 335.83
X 336.71
X 337.30
X 336.63
X 336.44
X 336.41
X 337.63
X 336.60
X 336.43
X 335.71
X 333.49
X 336.82
X 337.01
X 337.22
X 339.32
X 337.32
X 341.23
X 341.56
X 337.56
X 337.74
X 337.17
X 338.15
335
340

LEGEND

- Control Point
- Gaurd Post
- Fire Hydrant
- Spike & USACE Washer
- 5/8" Rebar & USACE CAP
- PP Power Pole
- Monitor Well

LICENSED LAND SURVEYOR
KEVIN D. BURGESS
No. 6718
STATE OF CALIFORNIA

USACE SPK Sac Dist		
DRAWN KDB	DATE 07/05/12	CAMP PARKS Dublin, Ca
APPROVED KR	DATE 07/05/12	RFTA Site 2 Boundary & Topo
SCALE 1" = 60'	SHEET 1 of 1	PROJECT NO. GIS & Mapping 12-20

ENCLOSURE 2
ENVIRONMENTAL DOCUMENTATION

Assistant Secretary of the Army (Installations & Environment), 2005, Transmittal of Model Language for Findings of Suitability to Transfer (FOST) and Deeds Pertaining to Army Real Estate, with 28 May 2013 update.

Blue Marble Inspections, Inc., 2003, Letter Subject: Radon Air Sampling and Analysis at Parks Reserve Forces Training Area, Dublin, CA, Subcontract Agreement #SC-1744, January 2003

California Department of Toxic Substances Control, 2014, Final Remedial Action Construction Report Concurrence, PRFTA-02, Camp Parks, Dublin, Alameda/Contra Costa Counties, August 2014

California Department of Toxic Substances Control, 2015, Final Land Use Control Implementation Plan Concurrence, Former Building 109 Incinerator (PRFTA-02), Parks Reserve Forces Training Area, Dublin, California, June 2015

California Regional Water Quality Control Board, 2015, Concurrence- PRFTA-02 Groundwater Monitoring Well Removal Request, Camp Parks, Dublin, Alameda County, March 2015

Department of the Army, 2009, Record of Decision for the Real Property Master Plan and Real Property Exchange at United States Army Garrison, Camp Parks, California, Department of the Army, Installation Management Command., October 2009

Deputy Undersecretary of Defense (Industrial Affairs & Installations) 1997, Base Reuse Implementation Manual (BRIM), Appendix F DOD Environmental Policies and Guidance, DOD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer (1 June 1994)

RBF Consulting, 2013, Dublin Crossing Final Specific Plan, October 2013
http://www.dublinca.gov/DocumentCenter/View/5847

RBF Consulting, 2013, Dublin Crossing Final Environmental Impact Report, October 2013
http://dublinca.gov/DocumentCenter/View/4738

U. S. Army Center for Health Promotion and Preventive Medicine (USACHPPM), 2002, Draft Environmental Baseline Survey No. 38-EH-3589-02, 187-Acre Real Property Exchange, Parks Reserve Forces Training Area, Dublin (Alameda and Contra Costa Counties), California, 22 April to 3 May 2002.

USACHPPM, 2010, Remedial Investigation/Feasibility Study No. 38-EH-077T-07, Former Building 109 Incinerator: U.S. Army Combat Support Training Center, Camp Parks, Dublin, California, May 2010

USACHPPM, 2010, Final Remedial Investigation/Feasibility Study No. 38-EH-077T-07, Former Building 109 Incinerator, US Army Combat Support Training Center, Camp Parks, Dublin, California, May 2010

USACHPPM, 2010, Draft Environmental Condition of Property Report for the Dublin Crossing (Formerly the 180-Acre) Real Property Exchange Area, U.S Army Combat Support Training Center, Camp Parks, Dublin, California, January 2010.

USACHPPM, 2011, Final Environmental Condition of Property Report No. 38-EH-3589-10 Dublin Crossing (Formerly the 180-Acre) Real Property Exchange Area, U.S Army Combat Support Training Center and Camp Parks, Dublin, California, June 2011.

URS 2010, Draft Evaluation of Remedial Goals Technical Memorandum, IRP Site PRFTA-02, US Army Garrison Camp Parks, CA, August 2010

USAG Camp P arks, 2010, Proposed Plan Installation Restoration Site PRFTA-02, U.S. Army Garrison Camp Parks, Dublin, California, November 2010

USAG Camp Parks, 2015, Closure Certifications, IRP Site PRFTA-02, Building 109 Incinerator, Parks Reserve Forces Training Area, June 2015

URS, 2012a, Final Record of Decision Installation Restoration Program PRFTA-02, U. S. Army Garrison Camp Parks. June 2012

URS, 2012b, Final Remedial Design Work Plan, Installation Restoration Program PRFTA-02, U.S. Army Garrison Camp Parks, July 2012

URS, 2014a, Final Removal Action Completion Report, PRFTA-02, U. S. Army Garrison Camp Parks July 2014

URS, 2014b, Final Annual Groundwater Monitoring Report, IRP Site PRFTA-02, Parks Reserve Forces Training Area – Dublin, CA, May 2014

U.S. Army, 2005, Army Regulation 210-20 Real Property Master Planning for Army Installations

US Army Garrison Camp Parks, 2009a Final Environmental Impact Statement on Master Planned Redevelopment at Camp Parks, July 2009

US Army Installation Management Command, 2009b, Record of Decision for the Real Property Master Plan and Real Property Exchange at US Army Garrison Camp Parks
USACE, 2003, Ordnance and Explosives Archives Search Report Findings for Parks Reserve Forces Training Area, Dublin, California, January 2009

USACE, 2015, Land Use Controls Implementation Plan (Final), PRFTA-02 Former Building 109 Incinerator, Parks Reserve Forces Training Area, Dublin, California, April 2015

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ENCLOSURE 3

TABLE 1 – DESCRIPTION OF PROPERTY

Building Number and Property Description	EBS Parcel Designation	Condition Category	Remedial Actions
Bldg. 109	1	4	Removal of dioxins and metals-contaminated soil to state industrial screening level suitable for commercial and industrial use, groundwater monitoring.. Certifications and concurrence letters are in Enclosures 12 to 17

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.

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ENCLOSURE 4

TABLE 2 – NOTIFICATION OF HAZARDOUS SUBSTANCE STORAGE, RELEASE OR DISPOSAL

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Bldg 109	Toxic Metals	1940s-1980	Removal of dioxins and metals-contaminated soil to state industrial screening level suitable for commercial and industrial use, groundwater monitoring. Certifications and concurrence letters are in Enclosures 12 to 17

* The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or 'Superfund') 42 U.S.C. §9620(h). This table provides information on the storage of hazardous substances for one year or more in quantities greater than or equal to 1,000 kilograms or the hazardous substances' CERCLA reportable quantity (whichever is greater). In addition, it provides information on the known release of hazardous substances in quantities greater than or equal to the substances CERCLA reportable quantity. See 40 CFR Part 373.

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ENCLOSURE 5

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
Bldg 109	Diesel Fuel	1940s-1980	2,500 gallon UST Removal

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ENCLOSURE 6

CERCLA NOTICE, COVENANT, AND ACCESS PROVISIONS AND OTHER DEED PROVISIONS

I. Property Covered by Notice, Description, Access Rights, and Covenants Made Pursuant to Section 120(h)(3)(A) of the Comprehensive Environmental Response Compensation, and Liability Act of 1980 (42 U.S.C. Section 9620(h)(3)(A)):

For the Property, the Grantor provides the following notice, description, and covenants and retains the following access rights:

A. Notices Pursuant to Section 120(h)(3)(A)(i)(I) and (II)) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. Section 9620(h)(3)(A)(i)(I) and (II):

Pursuant to Section 120(h)(3)(A)(i)(I) and (II) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 U.S.C. §9620(h)(3)(A)(i)(I) and (II)), available information regarding the type, quantity, and location of hazardous substances and the time at which such substances were stored, released, or disposed of, as defined in section 120(h), is provided in **Exhibit 1**, [Insert the deed exhibit number for FOST Table 2 – Hazardous Substance Storage, Release and Disposal, which will be included in the deed as an exhibit], attached hereto and made a part hereof. [See Table 2 Enclosure 4]

B. Description of Remedial Action Taken, if Any, Pursuant to Section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(i)(III)):

Pursuant to section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(i)(III)), a description of the remedial action taken, if any, on the property is provided in Exhibit 1, [Insert the deed exhibit number for FOST Table 2 – Hazardous Substance Storage, Release and Disposal, which will be included in the deed as an exhibit], attached hereto and made a part hereof.

C. Covenant Pursuant to Section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(ii) and (B)):

Pursuant to section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(ii) and (B)), the United States

warrants that -

(a) All remedial action necessary to protect human health and the environment with respect to any hazardous substance identified pursuant to section 120(h)(3)(A)(i)(I) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 remaining on the property has been taken before the date of this deed, and

(b) Any additional remedial action found to be necessary after the date of this deed shall be conducted by the United States.

D. Access Rights Pursuant to Section 120(h)(3)(A)(iii) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(iii)):

The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the property, to enter upon the property in any case in which a remedial action or corrective action is found to be necessary on the part of the United States, without regard to whether such remedial action or corrective action is on the Property or on adjoining or nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the Grantee and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the Grantee or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the property and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the Grantee's and the Grantee's successors' and assigns' quiet enjoyment of the property. At the completion of work, the work site shall be reasonably restored.

Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the property at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the Grantee, nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the United States.

In exercising such easement and right of access, neither the Grantee nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer or employee of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause: Provided, however, that nothing in this paragraph shall be considered as a waiver by the grantee and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

II. OTHER DEED PROVISIONS:

A. "AS IS"

a. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property and accepts the condition and state of repair of the subject Property. The Grantee understands and agrees that the Property and any part thereof is offered "AS IS" without any representation, warranty, or guaranty by the Grantor as to quantity, quality, title, character, condition, size, or kind, or that the same is in condition or fit to be used for the purpose(s) intended by the Grantee, and no claim for allowance or deduction upon such grounds will be considered.

b. No warranties, either expressed or implied, are given with regard to the condition of the Property, including, without limitation, whether the Property does or does not contain asbestos or lead-based paint. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos, lead-based paint, or other conditions on the Property. The failure of the Grantee to inspect or to exercise due diligence to be fully informed as to the condition of all or any portion of the Property offered, will not constitute grounds for any claim or demand against the United States.

c. Nothing in this "As Is" provision will be construed to modify or negate the Grantor's obligation under the CERCLA Covenant or any other statutory obligations.

B. HOLD HARMLESS

a. To the extent authorized by law, the Grantee, its successors and assigns, covenant and agree to indemnify and hold harmless the Grantor, its officers, agents, and employees from (1) any and all claims, damages, judgments, losses, and costs, including fines and penalties, arising out of the violation of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed by the Grantee, its successors and assigns, and (2) any and all any and all claims, damages, and judgments arising out of, or in any manner predicated upon, exposure to asbestos, lead-based paint, or other condition on any portion of the Property after the date of conveyance**.**

b. The Grantee, its successors and assigns, covenant and agree that the Grantor shall not be responsible for any costs associated with modification or termination of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed, including without limitation, any costs associated with additional investigation or remediation of asbestos, lead-based paint, or other condition on any portion of the Property.

c. Nothing in this Hold Harmless provision will be construed to modify or negate the Grantor's obligation under the CERCLA Covenant or any other statutory obligations.

C. POST-TRANSFER DISCOVERY OF CONTAMINATION

a. If an actual or threatened release of a hazardous substance is discovered on the Property after the date of conveyance, Grantee, its successors or assigns, shall be responsible for such release or newly discovered substance unless Grantee is able to demonstrate that such release or such newly discovered substance was due to Grantor's activities, use, or ownership of the Property. If the Grantee, it successors or assigns believe the discovered hazardous substance is due to Grantor's activities, use or ownership of the Property, Grantee will immediately secure the site and notify the Grantor of the existence of the hazardous substances, and Grantee will not further disturb such hazardous substances without the written permission of the Grantor.

b. Grantee, its successors and assigns, as consideration for the conveyance of the Property, agree to release Grantor from any liability or responsibility for any claims arising solely out of the release of any hazardous substance on the Property occurring after the date of the delivery and acceptance of this Deed, where such substance or product was placed on the Property by the Grantee, or its successors, assigns, employees, invitees, agents or contractors, after the conveyance. This paragraph shall not affect the Grantor's responsibilities to conduct response actions or corrective actions that are required by applicable laws, rules and regulations.

D. ENVIRONMENTAL PROTECTION PROVISIONS

The Environmental Protection Provisions are at Enclosure 7, which is attached hereto and made a part hereof. The Grantee shall neither transfer the property, lease the property, nor grant any interest, privilege, or license whatsoever in connection with the property without the inclusion of the Environmental Protection Provisions contained herein, and shall require the inclusion of the Environmental Protection Provisions in all further deeds, easements, transfers, leases, or grant of any interest, privilege, or license.

ENCLOSURE 7

ENVIRONMENTAL PROTECTION PROVISIONS

The following conditions, restrictions, and notifications will be attached, in a substantially similar form, as an exhibit to the deed and be incorporated therein by reference in order to ensure protection of human health and the environment.

1. LAND USE RESTRICTIONS

A. The United States Department of the Army has undertaken careful environmental study of the Property and concluded that the land use restrictions set forth below are required to ensure protection of human health and the environment. The Grantee, its successors or assigns, shall not undertake nor allow any activity on or use of the property that would violate the land use restrictions contained herein.

(1) Residential Use Restriction. The Grantee, its successors and assigns, shall use the Property solely for commercial or industrial activities and not for residential purposes. For purposes of this provision, residential use includes, but is not limited to, single family or multi-family residences; play areas and child care facilities; and nursing home or assisted living facilities; and any type of educational purpose for children/young adults in grades kindergarten through 12.

(2) Groundwater Restriction. Grantee is hereby informed and acknowledges that the groundwater under Property has elevated dioxins and dissolved metals. The Grantee, its successors and assigns, shall not access or use ground water underlying the Property for any purpose without the prior written approval of United States Department of the Army, the San Francisco Bay Regional Water Quality Control Board and California Department of Toxic Substances Control. The Army, DTSC and the SFBRWQCB must be notified in advance regarding any proposed changes to land use or groundwater use. For the purpose of this restriction, "ground water" shall have the same meaning as in section 101(12) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

B. Modifying Restrictions. Nothing contained herein shall preclude the Grantee, its successors or assigns, from undertaking, in accordance with applicable laws and regulations and without any cost to the Grantor, such additional action necessary to allow for other less restrictive use of the Property. Prior to such use of the Property, Grantee shall consult with and obtain the approval of the Grantor, and, as appropriate, the State or Federal regulators, or the local authorities. Upon the Grantee's obtaining the approval of the Grantor and, as appropriate, state or federal regulators, or local authorities, the Grantor agrees to record an amendment hereto. This recordation shall be the responsibility of the Grantee and at no additional cost to the Grantor.

C. Submissions. The Grantee, its successors and assigns, shall submit any requests to modifications to the above restrictions to Grantor and the California Department of Toxic Substances Control**,** by first class mail, postage prepaid, addressed as follows:

a. Grantor

Sacramento District
U.S. Army Corps of Engineers
Attn: Real Estate Division
1325 J Street
Sacramento, CA 95814

b. EPA/State Regulator

California Department of Toxic Substances Control
Office of Military Facilities
8800 Cal Center Drive
Sacramento, California 95826-3200

2. PESTICIDE NOTICE AND COVENANT

The Grantee is hereby notified and acknowledges that registered pesticides have been applied to the property conveyed herein and may continue to be present thereon. The Grantor and Grantee know of no use of any registered pesticide in a manner (1) inconsistent with its labeling or with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)(7 U.S.C. § 136, et seq.) and other applicable laws and regulations, or (2) not in accordance with its intended purpose.

The Grantee covenants and agrees that if the Grantee takes any action with regard to the property, including demolition of structures or any disturbance or removal of soil that may expose, or cause a release of, a threatened release of, or an exposure to, any such pesticide, Grantee assumes all responsibility and liability therefor.

ENCLOSURE 8
REGULATORY/PUBLIC NOTICES
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ENCLOSURE 9
REGULATORY/PUBLIC COMMENTS
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ENCLOSURE 10
ARMY RESPONSE
(Final Document Only)

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ENCLOSURE 11
MITIGATION AND MONITORING COMMITMENTS

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8.0 MITIGATION AND MONITORING COMMITMENTS

The Army is committed to sustaining and preserving the environment at Camp Parks. Appropriate mitigation and monitoring measures will be applied to mitigate the magnitude of project impacts. A Mitigation and Monitoring Plan will be adopted for mitigation measures. As part of the decision to implement the Proposed Action as part of Real Property Master Planning and Land Exchange at U.S. Army Garrison, Camp Parks, the Army and the exchange partner will enact the following environmental mitigations presented in the tables below. These mitigation measures, which were identified as proposed mitigation measures in Chapter 4 of the FEIS, will be implemented to reduce the severity and extent of potential impacts of this decision. Some of these measures are covered by existing law or are already addressed in the mandates of existing documents such as the installation's Integrated Natural Resources Management Plan and Integrated Cultural Resource Management Plan; they are therefore not discretionary.

Army Mitigation and Monitoring Commitments

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
Air	Construction-related diesel emissions	Construction	Army contractors involved with construction on Camp Parks would develop and implement a Construction Emission Mitigation Plan (CEMP) that would include a Diesel Particulate Matter Plan (DPM) that may include the use of low-sulfur fuels, idling diesel equipment away from residential areas, trip minimization, and tuning equipment to minimize emissions. Measures to minimize particulate matter may include use of water or dust palliative, wind fences, and low truck speeds.
Air	Operation-related ROG, PM10, and air toxics emissions	Site-specific Planning/ Operations	Encourage the use of alternate modes such as bicycling and walking by providing facilities (e.g. bicycle lockers or racks) and connectivity of bike/pedestrian paths, acquisition and use of zero-emissions vehicles for on-base travel, and use landscaping to reduce heat-island effect.
Topography, Geology, Mineralogy and Paleontology	Structures for human occupancy near an active fault	Site-Specific Planning/ Construction	Conduct geotechnical investigation to determine if active fault trace crosses proposed building site. Facilities should be designed to reduce risk of earthquake ground failure and prevent buildings from collapsing. Buildings should be situated at least 50 feet from active fault traces (Alquist-Priolo Earthquake Fault Zone Act 1973).
Hydrology, Groundwater and Soils	Construction-site erosion/ storm water pollution Urban storm water pollution Spills of chemicals and fuels	All Phases	Follow appropriate regulations for control of storm water and proper use, storage, and disposal of chemicals and fuels.
Hydrology, Groundwater and Soils	Construction sites that disturb greater than one acre	Site-Specific Planning/ Construction	Obtain NPDES General Construction Permit for storm water discharges from San Francisco Bay Regional Water Quality Control Board (SFRWQCB) prior to initiating construction activities. File notice of intent to discharge storm water with SFRWQCB and develop construction SWPPP that outlines the erosion and sediment control BMPs to ensure that storm water runoff from the site does not impair local water bodies. Each site-specific SWPPP should consider on-post and off-post drainage and water flow surrounding its area of purview. BMPs should be properly installed and maintained to reduce or eliminate impacts to surface water. Hydromodification Management (HM) Standard such that stormwater discharges from

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			applicable new development and redevelopment projects at Camp Parks and Dublin Crossing shall be designed to incorporate appropriate measures to not cause an increase in the erosion potential of the receiving creek over the pre-project (existing) condition.
Hydrology, Groundwater and Soils	Urban storm water pollution	Operation and Maintenance	Reduce or eliminate pollution by using post-construction, public education and public involvement storm water BMPs. • Post-construction BMPs include use of vegetated filter strips along edges of parking areas to filter storm water or wet ponds to collect and treat storm water through settling and algal uptake. • Public education BMPs include providing handouts, posters, or presentations to community groups on common practices (fertilizing a lawn; disposing of used oil; properly storing chemicals and paints; and cleaning up pet waste) can improve the storm water runoff and help clean local water bodies. Public involvement BMPs include stenciling storm drains, cleaning up streams, and maintaining wetlands.
Hydrology, Groundwater and Soils	Potential urban/ industrial impacts to surface water	Operation and Maintenance	Implement good housekeeping BMPs and a chemical/fuel spill prevention plan with use, storage, and disposal guidelines.
Hydrology	Potential flooding	Site-Specific Planning/ Construction	Avoid construction in the 100-year floodplain of the Chabot Canal whenever possible. Provide adequate storm water drainage for the new development.
Wetlands	Construction within or adjacent to jurisdictional wetlands including freshwater marsh, vernal pools, and forest vegetation communities	Site-Specific Planning/ Construction	Avoid wetland disturbance and resulting need for compensatory mitigation whenever possible by relocating or reconfiguring proposed facilities. If avoidance could not be achieved, the following measures could apply after consultation with the USACE prior to disturbance activities in jurisdictional wetlands (Booz Allen 2004) to determine specific mitigation measures and requirements: • Minimize unavoidable impacts by making the area of impact as small as possible and mitigating impact intensity. • Mitigation measures could include, but would not be limited to, access limitations, use of buffer

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			zones, formal SWPPP protocols, implementation of BMPs, and wetland enhancement. When wetlands could not be fully avoided and mitigation was insufficient, compensation would be used to restore or create wetlands in other locations. Mitigation would be carried out before or in conjunction with activities that adversely affect these sensitive habitats.
Wetlands	Construction adjacent to jurisdictional wetlands including freshwater marsh, vernal pools, and forest vegetation communities	Operation	Camp Parks currently has a policy that designates wetlands as "no digging," or "limited access" for military training activities. This policy is documented in the Integrated Natural Resource Management Plan (INRMP; USACE 2003) and stated during training briefings. These policies would remain in effect under all alternatives.
Wetlands	Construction adjacent to jurisdictional wetlands including freshwater marsh, vernal pools, and forest vegetation communities	All Phases	Establish buffer zones around adjacent wetlands, drainages and riparian forest within which no activity would be allowed. The buffer zones would be of sufficient width to: • Prevent incursion into protected area by equipment and workers • Avoid construction runoff into the protected area • Prevent degradation of the wetland by providing long-term protection of the watershed in its immediate vicinity. Use temporary fencing or other materials during construction to divert surface water flow and silt from drainages and associated vegetation. Buffer zones width around individual wetlands would be established on a case-by-case basis after consideration of terrain and drainage patterns, type of disturbance, season and anticipated length of disturbance, resources that would be affected, and the likelihood that a Federally listed species might be found in the wetland.
Wetlands	Surface water runoff	Site-Specific Planning/ Construction	Appropriately convey, capture, and treat stormwater runoff. In keeping with the principles of pollution prevention in the installation's SWPPP (CSS 2003), develop and implement construction site-specific SWPPPs specifically focused on redevelopment. These SWPPPs would prescribe BMPs and compliance monitoring to control erosion and contaminated runoff from construction sites, and supplement BMPs defined for specific industrial activities in the current Camp Parks SWPPP.

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			BMPs could include use of sediment trapping and filtering systems, bioswales, storm drain inlet protection, natural depressions, stormwater detention or retention ponds, and sediment basins, in addition to access restrictions and buffers. The following goals would be part of the construction site specific SWPPPs to control stormwater runoff during construction at Camp Parks: • Onsite capture and treatment of 100 percent of construction period runoff to prevent stormwater pollution during this period. • Develop specific long-term stormwater control measures such as vegetated swales and storm drain inlet filters to capture and treat 80 to 90 percent of the site's runoff. Develop setbacks from drainages and vegetate areas to control stormwater.
Wetlands	Surface water runoff	Operation and Maintenance	Vehicles and equipment are to use existing roads and routes of travel to the greatest extent practicable. Vehicles traveling off road at night within 100 feet of a water body within the designated HMUs and Tassajara Creek are to maintain a speed of 10 miles per hour or less. Continue Integrated Training Area Management programs such as Land Rehabilitation and Maintenance, which repair damaged areas and minimize potential future damage. In addition, known breeding ponds are marked as "no-go" areas using Siebert stakes. Current SWPPP would need to be modified to address ongoing operations housed in new facilities specifically designed for them and incorporating containment mechanisms. Many sites specifically addressed in the current SWPPP would change under Master Plan implementation. Each activity would be reviewed as to its nature, its materials and processes, and its potential for storm water contamination before a comprehensive list of BMPs was tailored to individual building complexes. The BMPs would include measures such as: • Good housekeeping • Preventive maintenance of oil-water separators • Minimize outdoor storage of materials • Use of dry sweep and drip pans • Use of pavement, small berms, or secondary containment structures where needed.

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			One difference between the current and proposed situation under the Master Plan may be the installation of more landscaped areas than currently exist. Maintenance of such areas would employ the following prescriptions within the SWPPP: • Avoid discharge of water used to irrigate ornamental plants into nearby drainages because this water likely contains chloramine (a residual disinfectant) that could negatively impact aquatic life • Control runoff from areas that are landscaped and fertilized.
Fish and Wildlife	Construction adjacent to ponds, wet meadows, riparian areas, and grassland vernal pools	Site-Specific Planning/ Construction	In the Training Area, continue existing buffer areas around wetlands and riparian areas. Wherever possible, ponds, wet meadows, riparian areas, and grassland vernal pools at Camp Parks would be avoided or protected as discussed above under wetlands. The following types of mitigation would be applied as needed to avoid, minimize, or compensate for the impacts discussed above: • Buffer zones around aquatic or other sensitive habitats • Preconstruction surveys to locate currently active breeding sites for important vertebrate species so they can be avoided • Implementation of construction BMPs • Creation/restoration/enhancement of wetlands
Fish and Wildlife	Redevelopment construction activity	Site-Specific Planning/ Construction	To minimize the potential for redevelopment actions to increase erosion and sedimentation and disturb sensitive wildlife species, BMPs would be implemented such as: • Revision of the SWPPP prior to groundbreaking; implementation of erosion control measures. • Relocation of burrowing owls. • Control of domestic pets to avoid wildlife mortality and harassment. • Reclamation and revegetation of habitat. • Ongoing wildlife surveys to keep the database on Camp Parks wildlife populations and use areas current. • Regular monitoring to identify/repair damaged or eroded areas. • Revegetation methods using appropriate native plants. • Prior to construction, an on-site construction

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			personnel briefing on environmentally sensitive habitats and species and specific conservation measures developed for each. • Containment and frequent disposal of garbage so as not to attract wildlife. • Presence of biologist on installation during construction activities. • Designate specific sites for vehicle parking, storage of construction supplies, etc. in previously disturbed locations that would minimize potential effects to federally listed species. • Control dust, erosion, and sedimentation through use of Best Available Control Technology (BACT), for example, use of silt/wind fences, use of water or chemical stabilizers for dust control, covering of haul vehicles, and minimizing time graded areas are exposed. • Implement BMPs such as a 20-mph vehicle speed limit within the project area, covering or providing escape ramps for trenches greater than two feet deep, checking pipes or culverts that have a diameter over four inches before moving them, placing food-related trash in closed containers. • Rapidly rehabilitate disturbed areas to minimize erosion and downstream flow of sediment. • Use well-maintained vehicles and defined refueling and maintenance locations to minimize uncontained petroleum leaks. • Minimize and define work area boundaries for each construction site. • Conduct pre-construction briefings for construction crews to review BMPs being implemented during construction. • Vehicles and equipment are to use existing roads and routes of travel to the greatest extent practicable. • To minimize potential adverse effects caused by surface water runoff, measures would be implemented to appropriately convey, capture, and treat stormwater runoff. • Existing BMPs defined for specific industrial activities in the current Camp Parks SWPPP would also be implemented (CSS 2003). • Establish, mark, and protect buffer areas around wetlands adjacent to development areas.
Fish and Wildlife	Encountering special status species	Operations	If a special status species were encountered during operations, activities in the area would cease and the Camp Parks Environmental Office would be notified to determine if any action needs to be taken. The Army will notify USFWS within 24-hours of finding an injured or dead listed species, or any unanticipated damage to listed species habitat associated with project

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			activities. Camp Parks would also submit any survey results to the CNDDB and include them in the installation's annual INRMP update.
Fish and Wildlife	Raptor Nests	All Phases	Whenever possible, impacts to larger trees that occur in the Training Area riparian habitats or in the Cantonment Area would be avoided.
Fish and Wildlife	Raptor Nests	All Phases	Prior to construction or intensive training activity, a biologist would conduct site-specific surveys for active raptor nests in the area during the appropriate nesting period for these raptors (typically March through August). Surveys would be conducted for each specific activity or annually across the post so that potentially disturbing activities would be avoided or minimized within 1/8 mile of active nests between February 1 and August 15. If a previously active nest is not occupied by May 15, the buffer may be suspended for that breeding year.
Fish and Wildlife	Western Burrowing Owl	Site-Specific Planning/ Construction	The mitigation goal for the burrowing owl is to compensate for the anticipated impact by replacing or providing substitute resources or environments elsewhere on Camp Parks according to recommended guidelines published in the California Department of Fish and Game Staff Report on Burrowing Owl Mitigation (CDFG 1995). Before initiating ground-disturbing activities in grassland habitats, preconstruction surveys for burrowing owls would be conducted by a qualified biologist within 150 meters (approx. 500 ft.) of construction areas. Surveys would be conducted no more than 90 days before ground disturbance. If burrowing owls were found, the burrow site would be avoided, if possible, and given at least a 50 meter (approx. 160 ft.) buffer. If the burrow cannot be avoided, the biologist would determine whether eggs or young were present in the nest. If eggs or young were present, no disturbance would occur within 50 meters of the nest site until the young had fledged. If no young were present or if young had fledged, burrowing owls would be passively relocated to other nearby areas of suitable habitat on Camp Parks.
			Owls would be excluded from burrows in the immediate impact zone and within a 50 meter buffer zone by installing one-way doors in burrow entrances. One-way doors (e.g. modified dryer vents) should be left in place 48 hours to ensure owls have left the burrow before excavation. Two artificial burrows would be provided for each burrow in the project area that will be rendered biologically unsuitable. The project area would be monitored daily for one week to confirm owl use of burrows before excavating

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			burrows in the immediate impact zones.
Fish and Wildlife	San Joaquin Kit Fox	Site-Specific Planning/ Construction	Conduct surveys, establish exclusion zones, and conduct monitoring consistent with the USFWS "*Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance*," dated June 1999. Negative survey results would be reported as part of Camp Parks' INRMP annual update. If kit foxes were observed during surveys, then Camp Parks would contact USFWS to coordinate construction activities, in accordance with the Endangered Species Act.
Fish and Wildlife	California Red Legged Frog	Site-Specific Planning/ Construction	Conduct pre-activity surveys of wetland habitat within 200-feet of the construction site in accordance with the field survey methodology outlined in the *U.S. Fish and Wildlife Service Revised Guidance on Site Assessments and Field Surveys for California Red-legged Frogs, August 2005* (USFWS 1997). Surveys would typically consist of four night and two day surveys. If California red-legged frogs are observed within the project area and have the potential to be harmed, they would be relocated from the site to an area within one of the installation's HMUs. If they are known or suspected to occur near a construction or demolition site, silt fences or another similar barrier around any adjacent wetlands that are within 200 feet of construction would be installed to separate them from the site and monitoring would occur as needed for these species during construction. The barrier would be inspected for integrity on a weekly basis during construction and repaired as needed.
Fish and Wildlife	California Tiger Salamander	Site-Specific Planning/ Construction	Conduct pre-activity surveys consisting of two nights of burrow inspections within five days prior to the initiation of construction or ground disturbance activities. If California tiger salamanders are observed within the project area, they would be relocated from the site to a burrow near a known or potential breeding pond. If they are known or suspected to occur near a construction or demolition site, silt fences or another similar barrier would be installed around any adjacent wetlands that are within 200 feet of construction to separate them from the site and monitoring would occur as needed for these species during construction. The barrier would be inspected for integrity on a weekly basis during construction and repaired as needed."
Cultural	National Register of Historic Places (NRHP) Eligible Sites	All Phases	To minimize the potential for adverse effects, the Camp Parks entrance sign would be treated and managed in a manner that prevents the deterioration or destruction of the character of the sign. The sign should be regularly protected and maintained as needed by methods identified and outlined in the

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
	(Camp Parks entrance sign)		ICRMP.
Cultural	Eligible Historic Archeological Sites	Operations and Maintenance	Methods would be developed to avoid or reduce effects on the NRHP eligible historic period site located in the Training Area. These methods (e.g., avoidance markers if appropriate, occasional monitoring if intense training activity is planned near the site, and coordinating with the DPT) would be implemented to protect the sites from training-related damage.
Cultural	Potential Buried Cultural Resources or Human Remains	Site-Specific Planning/ Construction	If previously undetected cultural resources or human remains were unearthed during construction excavations, the application of standard practices in accordance with the Integrated Cultural Resources Management Plan (ICRMP; Parsons 2001) would mitigate potential adverse impacts. If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or human bone, are inadvertently discovered during ground-disturbing activities, work would stop in that area and within 100 feet of the find. The Camp Parks Environmental Office would be notified immediately and would guide compliance with the ICRMP.
Cultural	Potential Buried Cultural Resources or Human Remains	Site-Specific Planning/ Construction	Camp Parks will implement monitoring during grading, excavation, and disturbance activities as outlined in the Section 106 coordination letter and concurred with by the SHPO on 1 June 2006.
Land Use	Considerable change in land ownership uses in the southern Cantonment Area	Site-Specific Planning/ Construction	The proposed Dublin Crossing is compatible with the City of Dublin's guiding policy for the Eastern Extended Planning Area. However, the type and intensity of land uses proposed in Dublin Crossing are not consistent with the City of Dublin's current designation of public and semi-public and would require an amendment to its General Plan.
Land use	Land use conflicts identified in the Training Area (e.g., level of activity and use of artillery, helicopters, and demolition in areas adjacent to residences)	All Phases	The potential for land use conflicts with neighboring areas would continue to persist; however, mitigation measures employed by the surrounding development would minimize the intensity of these conflicts. Mitigation already proposed in existing EIRs would minimize these land use conflicts.
Transportation and Access	Traffic improvements	Site-Specific Planning/	Development of Dublin Crossing by private developers could result in direct and indirect traffic

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
	needed to mitigate decreased LOS at several major intersections in the local transportation network from the proposed Dublin Crossing development	Construction	impacts. Capacity improvements that may be required in the future include: Dougherty Road/Central Parkway, Arnold Road/Central Parkway, Dublin Boulevard/Iron Horse, Hopyard Road/I-580 Eastbound off-ramp, Westbound Hacienda Crossing at Hacienda Drive, Dougherty Road/Amador Valley, Arnold Road/Dublin Boulevard, and Hacienda Drive/I-580 Eastbound off-ramp. Capacity improvements at Dublin Boulevard/Dougherty Road are also recommended, and signal operation mitigations should be considered in the approaches to Dougherty Road/Scarlett Drive and Dougherty Road/Central Parkway intersections. In addition to the intersection improvements, there is the potential that street segment improvements may also be necessary. This could include widening Dougherty Road from four lanes to six lanes between Houston Place and Amador Valley Boulevard, the extension of Scarlett Drive from Houston Place to Dublin Boulevard, and widening of Arnold Road from two lanes to four lanes between Dublin Boulevard and Central Parkway. Traffic impacts would be caused primarily by redevelopment and mitigations for these impacts would not be funded by the Army.
Noise	Potential complaints about future noise	Operations and Maintenance	Camp Parks would continue to implement a program of outreach to communities surrounding Camp Parks to explain the types of military activities that generate the noises and help alleviate their sense of annoyance.
Visual and Aesthetic Resources	Removal of features important to community's visual character (e.g., mature trees, landscaping, or historic structures;	Site-Specific Planning/ Construction	Mitigation measures could include, but are not limited to, avoidance, screening, habitat restoration or creation, view-compatible facility color schemes and design, suitable landscaping, and implementation of BMPs that could further protect quality visual and aesthetic resources. Be consistent with the visual character of the established Camp Parks design theme (Nakata 2002) in facility design and construction.
	Disruption of locally or regionally significant views or views from a community setting; Placement of a structure providing		In Dublin Crossing, (i) Adhere to the City of Dublin Development Elevation Cap at an elevation of 770 feet; and (ii) Develop property in a manner consistent with other applicable Plan and policies.

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
	undesirable views or not conforming to city zoning ordinances.		
Health/Safety and Hazardous Substances	Demolition of buildings	Site-Specific Planning/ Construction	Demolition of buildings that may contain asbestos containing material or lead-based paint must be in compliance with DoD policies, and state and Federal regulations for prevention of air releases and worker exposure, accurate characterization, and appropriate disposal of debris and other wastes. Asbestos and LBP abatement contractors must be authorized to perform work in the State of California.
Health/Safety and Hazardous Substances	Demolition and construction	Site-Specific Planning/ Construction	Workers operating demolition or earthmoving equipment, installing foundations or pipelines, or performing other tasks that may involve excavation of, or contact with, potentially contaminated soil, buried fuel tanks, septic tanks, abandoned sewer or fuel lines, or demolition debris must be trained in hazardous substance site operations and supervised as required by 29 CFR 1910.120. These workers must also be provided adequate personal protective equipment and repeatedly be informed of the known and potential hazards during daily safety meetings.
Health/Safety and Hazardous Substances	Residual hazardous constituent concentrations in soil	Site-Specific Planning/ Construction	Before redevelopment contracts are finalized, standards for allowable residual hazardous constituent concentrations in soil at each location must be established and the requirements to verify compliance set and documented in consultation with state and local officials. The Housing and Recreational Land Use Categories should have the most restrictive limits.
Health/Safety and Hazardous Substances	All demolition, construction, and landscaping	Site-Specific Planning/ Construction	Strict dust control should be explicitly required for all demolition, construction, and landscaping contracts, especially where elevated arsenic and chromium are found in the natural soil. In addition to wetting of dirt roads and excavated soils, methods to minimize dust from demolition of buildings and foundations, removal of asphalt and concrete, and grading and landscaping should be evaluated in consultation with local and state officials and written into engineering plans and specifications.
Health/Safety and Hazardous Substances	Traffic impacts or potential hazardous substance releases or exposure incidents	Site-Specific Planning/ Construction	Additional mitigation measures (e.g., secure containment or covering of demolition debris, contaminated soil, or wastes in truck beds) may be required by city or county ordinances or other regulations to prevent releases during transport. Additional voluntary mitigation measures (e.g., such as scheduling transport of demolition debris or other wastes to offsite landfills outside of heavy traffic time periods) should be considered to minimize traffic

Resource Area	Impact/ Situation	Project Phase	Mitigation and Monitoring Commitment
			impacts or potential hazardous substance releases or exposure incidents.

In addition to the specific mitigation and monitoring commitments identified above, the following activities would also be conducted:

- Frequent monitoring of construction activities as well as sensitive resource locations by the CSTC Environmental Office or consultants. Monitoring of the project sites should occur at least once per month during construction and more frequently in areas that may contain sensitive resources.
- Monitoring activities should include, but not be limited to, the following:
    - Construction crews should be made aware of resources present on the project site, locations of known areas that may require mitigation and monitoring, buffer zones implemented around specific resources, and other necessary measures to ensure resource protection.
    - A representative from the CSTC Environmental Office should attend construction meetings regularly to ensure compliance with this Plan as well as address any unanticipated issues.
    - The construction sites should be inspected at least once a week to ensure that appropriate measures are in place, equipment is used and stored in appropriate areas, and construction is not occurring in sensitive areas.
- The construction contractor should be required to provide the following accommodations:
    - Designate an environmental engineer to provide construction contractor quality control at project sites.
    - Comply with all applicable federal, state, and local environmental protection laws and regulations.

  - Comply with all specified DoD, Army, and CSTC regulations, including environmental requirements.

- Submit a preconstruction Environmental Protection Plan (EPP) to the Contracting Officer and the CSTC Environmental Office for review and approval. The EPP should include some or all of the following components:

  - Erosion sedimentation and pollution control plan including monitoring and reporting requirements
  - Recycling and waste minimization/management/disposal plan
  - Air pollution control plan
  - Contaminant prevention plan
  - Waste water management plan
  - Cultural and natural resources and wetlands plan
  - Pesticide application/management plan
  - Employee Environmental Training
  - Spill Prevention Control and Countermeasure Plan (SPCC)
  - Spill Contingency Plan (SCP)

All practicable means to avoid or minimize environmental harm from the selected action have been adopted, except as indicated otherwise above. The Army will also employ a monitoring and enforcement program for the mitigations adopted in this decision.

ENCLOSURE 12
FEASIBLIITY STUDY – PROPOSED PLAN STATE CONCURRENCE

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Department of Toxic Substances Control

Linda S. Adams
Acting Secretary for
Environmental Protection

Deborah O. Raphael
Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

July 27 2011

U. S. Army Garrison, Camp Parks
IMWE-CST-PPW
790 5th Street
Camp Parks, CA 94568-5201
Attn: LTC Michael P. Friend, Commander

FINAL PROPOSED PLAN/FACT SHEET CONCURRENCE, PRFTA-02 (FORMER BUILDING 109), U.S. ARMY COMBAT SUPPORT TRAINING CENTER, CAMP PARKS, DUBLIN, ALAMEDA COUNTY

Dear LTC Friend:

The California Department of Toxic Substances Control (DTSC) has reviewed and concurs with the *Final Proposed Plan & Fact Sheet (Final PP/Fact Sheet), PRFTA-02, (Former Building 109),* submitted 19 November 2011 by URS Corp. on behalf of the U.S. Army. DTSC informally concurred that the Final PP/Fact Sheet addressed DTSC's comments provided 23 September 2010 on the Draft Proposed Plan and Fact Sheet, submitted 03 September 2010. The Final Proposed Plan/Fact Sheet is also consistent with the *Camp Parks Final Public Participation Plan Addendum* which DTSC concurred with on July18, 2011.

BACKGROUND

Parks Reserve Force Training Area (PRFTA) is a U.S. Army facility located on Dublin Boulevard, Dublin (Alameda and Contra Costa Counties). It occupies approximately 2,498 acres and contains numerous active and formerly active buildings and facilities, including ranges, vehicle repair, medical, infrastructure maintenance, warehouses, and a former municipal incinerator -- former Building 109, (Parks RFTA-02). The installation is divided into a southern cantonment area, approximately 492 acres, located entirely

within Alameda County, and a largely undeveloped range and training area in the northern portion, approximately 2006 acres, located in Alameda and Contra Costa Counties.

PRFTA-02 is located in the southwestern corner of Parks and is bounded by 3rd Street to the North; a drainage ditch and other installation open land to the South; the western installation boundary, a drainage ditch and a paved path to the west; and a drainage ditch and other installation facilities to the east. Building 109 burned general installation waste from the 1940s until about 1980. The site currently consists of a grassy field, with areas of buried ash and waste, and the remains (foundation) of Building 109. A 2,500 gallon Underground Storage Tank (UST) with diesel ruptured during demolition of Building 109 in 1994. The site is contaminated with metals, particularly lead, fuel, and dioxins and furans. Groundwater is shallow, approximately eight to 16 feet below ground surface (bgs), and the waste is in groundwater at some locations.

The PRFTA -02 Final Remedial Investigation/Feasibility Study Report (Final RI/FS) recommended cleanup to commercial/industrial standards via excavation and disposal of approximately 6,000 cubic yards of lead and dioxin-contaminated soil, short-term groundwater monitoring, and land use controls. DTSC concurred with the Final RI/FS on October 25, 2010, and with the categorization of PRFTA-02 as Transfer Area Type 4 on February 18, 2011. DTSC provided informal concurrence on the Final Proposed Plan and Fact Sheet November 16, 2010, but delayed formal documentation via letter until now due to higher priority reviews and staff shortages due to furloughs.

CONCLUSION

DTSC concurs with the Final Proposed Plan and Fact Sheet for PRFTA-02. If you have any questions, please contact me at (916) 255-3714 or via e-mail at tescarda@dtsc.ca.gov.

Sincerely,

Terry Escarda

Terry M. Escarda, P.E.
Hazardous Substances Engineer
Sacramento Office
Brownfields and Environmental Restoration Program

cc: See next page

cc: Mr. George Leyva, P.G.
1515 Clay Street, Suite 1400
Oakland, California 94612

Mr. Paul Kot, REM
Environmental Protection Specialist
USAG Camp Parks DPW/ENV
Camp Parks, California94568-5201

Ms. Noelle Cochran
URS Group
8181 E. Tufts Avenue
Denver, Colorado 80237

ENCLOSURE 13
RECORD OF DECISION STATE CONCURRENCE LETTER

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Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

December 12, 2012

U.S. Army Garrison
Camp Parks
IMWE-CST-PPW
790 5th Street
Camp Parks, California 94568-5201

Attn: LTC David R. James, Commanding Officer

CONCURRENCE, FINAL RECORD OF DECISION (ROD), PRFTA-02 (FORMER BUILDING 109), U.S. ARMY COMBAT SUPPORT TRAINING CENTER, CAMP PARKS, DUBLIN, ALAMEDA AND CONTRA COSTA COUNTIES

Dear LTC James:

The California Department of Toxic Substances Control (DTSC) has reviewed and concurs with the subject document, submitted 20 July 2012 by URS Corp. on behalf of the U.S. Army. In our comment letter of 15 February 2012, we noted that the majority of our comments pertained to additional Land Use Control (LUC) language needed for concurrence. DTSC's Project Manager has determined that the Final ROD substantially addressed our comments, and DTSC's Legal Office has determined that the remaining issues can be addressed in the shortly forthcoming Land Use Control Implementation Plan.

BACKGROUND

Parks Reserve Force Training Area (PRFTA, aka Camp Parks) is a U.S. Army facility located on Dublin Boulevard, Dublin (Alameda and Contra Costa Counties). It occupies approximately 2,498 acres and contains numerous active and formerly active buildings and facilities, including ranges, vehicle repair, medical, infrastructure maintenance, warehouses, and a former municipal incinerator -- former Building 109, (Parks

RFTA-02). The installation is divided into a southern cantonment area, approximately 492 acres, located entirely within Alameda County, and a largely undeveloped range and training area in the northern portion, approximately 2006 acres, located in Alameda and Contra Costa Counties.

PRFTA-02 is located in the southwestern corner of Camp Parks and is bounded by 3rd Street to the North; a drainage ditch and other installation open land to the South; the western installation boundary, a drainage ditch and a paved path to the west; and a drainage ditch and other installation facilities to the east. Building 109 burned general installation waste from the 1940s until about 1980. The site currently consists of a grassy field, with areas of buried ash and waste, and the remains (foundation) of Building 109. A 2,500 gallon Underground Storage Tank (UST) with diesel ruptured during demolition of Building 109 in 1994. The site is contaminated with metals, particularly lead, fuel, and dioxins and furans. Groundwater is shallow, approximately eight to 16 feet below ground surface (bgs), and the waste is in groundwater at some locations.

The PRFTA-02 Final Remedial Investigation/Feasibility Study Report (Final RI/FS) recommended cleanup to commercial/industrial standards via excavation and disposal of approximately 6,000 cubic yards of lead and dioxin-contaminated soil, short-term groundwater monitoring, and institutional controls. DTSC concurred with the Final RI/FS on October 25, 2010, and with the categorization of the PRFTA-02 parcel as Transfer Area Type 5 on February 18, 2011.

CONCLUSION

DTSC concurs with the Final ROD for PRFTA-02. The bulk of our comment s addressed including and defining LUCs and their costs as part of the selected remedy, and adding specific language for closing bases (or, in this case, transferring parcels) that has been previously agreed upon by the military services and DTSC. The Responses to Comments and revised Draft Final ROD addressed those comments, and the Army has indicated that the remainder will be addressed in the forthcoming LUCIP.

If you have any questions, please contact Mr. Terry Escarda of my staff at (916) 255-3714 or via e-mail at tescarda@dtsc.ca.gov.

Sincerely,

Charlie Ridenour, P.E.
Branch Chief
Cleanup Program
Sacramento Office

cc: Mr. George Leyva, P.G.
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

Mr. Mark Hall, REM
Environmental Protection Specialist
USAG Camp Parks DPW/ENV
Camp Parks, California 94568-5201

Ms. Noelle Cochran
URS Group
8181 E. Tufts Avenue
Denver, Colorado 80237

Ms. Sonia Feldstein
Staff Counsel
Office of Legal Counsel
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, California 9471

ENCLOSURE 14
LAND USE CONTROLS IMPLEMENTATION PLAN STATE CONCURRENCE LETTER

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Department of Toxic Substances Control

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

June 19, 2015

Mr. Mark Hall
DPW-E
Camp Parks
Bldg. 791, 5th Street
Dublin, California 94568

FINAL LAND USE CONTROLS IMPLEMENTATION PLAN, FORMER BUILDING 109 INCINERATOR (PRFTA-02), PARKS RESERVE FORCES TRAINING AREA, DUBLIN, CALIFORNIA

Dear Mr. Hall:

The Department of Toxic Substances Control (DTSC) has reviewed the *Final Land Use Controls Implementation Plan, Former Building 109 Incinerator (PRFTA-02)* (Final LUCIP). The purpose of the Final LUCIP is to outline and document the process for implementation and maintenance of land use controls at the Parks Reserve Force Training Area (PRFTA) Former Building 109 Incinerator (PRFTA-02) at US Army Garrison Camp Parks in Dublin, California.

Camp Parks is a US Army facility which occupies approximately 2,498 acres containing numerous buildings and facilities. The US Army Corps of Engineers (USACE) has prepared the Final LUCIP for US Army Garrison Camp Parks Army Environmental Command on behalf of the PRFTA. The Final LUCIP describes how the land use restrictions presented in the *Final Record of Decision Installation Restoration Program Site PRFTA-02* (Final ROD; URS 2012) will be implemented and monitored.

PRFTA-02 is located in the southwestern corner of Camp Parks. The Former Building 109 incinerator was previously located on the site. The incinerator was used for burning general Camp Parks refuse during the 1940's and 1950's. Past site activities resulted in contaminants, primarily lead and dioxins, being deposited in site soil. In an effort to clean up the contamination, the Army selected the Excavation, Backfill, and Disposal with Short-term Monitoring and Land Use Controls (LUCs) alternative as the site remedy for PRFTA-02 (documented in the Final ROD). Since the final remedy did not result in removal of lead and dioxin contamination to unrestricted land use (remedial action completed in 2013 by URS), this remedy included LUCs to restrict future land use to uses that are consistent with the remedy (future commercial and industrial uses). These LUCs include engineering and physical barriers, such as fences and security

guards, and non-engineered controls that are administrative and legal, such as deed restrictions.

Based on review of the Final LUCIP, DTSC concurs with the Army described process for implementation and maintenance of LUCs at PRFTA-02. DTSC anticipates the Army is committed to implementing, monitoring, maintaining, and enforcing the LUCs identified in the Final LUCIP to protect human health and the environment.

If you have any questions regarding this letter, please contact me by email at dominique.forrester@dtsc.ca.gov or at (916) 255-3609.

Sincerely,

Dominique Forrester, PE
Project Manager
Federal Facilities Unit

cc: (by email)

Mr. James C. (Jim) Powers, PG, CEG, CHG
Sacramento District, USACE
1325 J Street
Sacramento, California 95814-2922
james.c.powers@usace.army.mil

Ms. Margarete "Maggie" Beth
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, California 94612
Margarete.Beth@waterboards.ca.gov

Mr. Mark Eldridge
U.S. Army Environmental Command
Cleanup and Munitions Division
2450 Connell Road
Bldg 2264, Room 126, (ATTN: Mr. Eldridge)
Fort Sam Houston, Texas 78234-7664
mark.h.eldridge.civ@mail.mil

ENCLOSURE 15
REMEDIAL ACTION COMPLETION REPORT STATE CONCURRENCE LETTER

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Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Miriam Barcellona Ingenito
Acting Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

August 18, 2014

U.S. Army Garrison, Camp Parks
IMWE-CST-PPW
Attn: LTC Christopher P. Gerdes, Commanding
620 6th Street
Camp Parks, California 94568-5201

FINAL REMEDIAL ACTION CONSTRUCTION REPORT CONCURRENCE, PRFTA-02, CAMP PARKS, DUBLIN, ALAMEDA/CONTRA COSTA COUNTIES

Dear LTC Gerdes:

The California Department of Toxic Substances Control (DTSC) has reviewed and concurs with the subject document, received 23 May, 2014.

BACKGROUND

This document comprises the Final Remedial Action Construction Report (Fnl RAC-R) for the Installation Restoration Program (IRP) site PRFTA-02 at the U.S. Army Garrison Camp Parks (Camp Parks) in Dublin, California. Site PRFTA-02 is also known as the Former Building 109 Municipal Incinerator. The Army removed site soil contaminated with lead and dioxins to restore the site for future industrial use, based upon previous use as established by the onset of Army ownership (commercial/industrial).

The Army conducted environmental investigations at PRFTA-02 to determine the presence and concentrations of chemicals at the site. After completing several investigations dating back to 1994, the Army determined that about 6,000 cubic yards of soil contained lead and dioxins above industrial cleanup levels. The Army used the investigation data to assess risk to human health and the environmental from chemicals detected at the site and subsequently evaluated potential soil remediation alternatives. The investigations, risk assessment, and remedial alternative evaluation are summarized in a Remedial Investigation/Feasibility Study (RI/FS) Report (USAPHC 2010) and Removal Action Construction Work Plan (URS, July 2012), concurred with by DTSC on 04 April 2013. The Army's preferred remedial alternative included removal of soil above the groundwater table, backfill with clean soil, off-site disposal of excavated soil, and Land Use Controls (LUCs). This design follows the PRTFA-02 Record of Decision (ROD, URS 2011). The constituents in soil that exceeded industrial remedial goals include lead and dioxins. The soil removal action is designed to address these constituents in soil in the contaminated area determined from the RI.

The Army established groundwater Remedial Action Objectives (RAOs) for evaluating and implementing the soil removal action, considering applicable standards. The RAOs are to restore the site for future industrial use and reduce risk to human health and the environment by removing soil to reduce the constituent concentrations in soil to meet industrial remedial goals.

In an e-mail dated March 25, 2014, DTSC concurred with comments submitted by Mr. George Leyva, PG, of the San Francisco Bay Regional Water Quality Control Board in a letter dated 22 January 2014. Those comments requested that "... in order to determine the efficiency of the removal, I request that the Draft RAC Report be augmented to graphically demonstrate the efficiency of the remedy implemented. There should also be included a site map similar to the Figure 4, "PRFTA-02 Well Location and Groundwater Elevations" map showing the existing monitoring well network. The data tables should include each monitoring well's screened interval depths, the most recent analytical data for the site's COCs (soil and dissolved concentrations), and the most recent groundwater elevations. In addition, to better track the placement of the site's monitoring wells, please provide the locations of the wells in a latitude/longitude format in decimal-degrees. "

DTSC further notes that latest results from the groundwater monitoring were presented at the Remedial Project Managers (RPM) meeting on 25 March 2014. The agencies reviewed the monitoring well implementation report and monitoring data and concurred that the results indicated that the RAOs had been met.

CONCLUSION

The quality of the Final RAC-Report was very good, our comments on the Draft Final have been addressed, DTSC has no major concerns with the remedy construction, and concurs with the Final Report.

If you have any questions or concerns with this letter, please contact me at (916) 255-3714 or via terry.escarda@dtsc.ca.gov.

Sincerely,

Terry Escarda

Terry M. Escarda, PE
Hazardous Substances Engineer
Federal Facilities Unit
Office of Military Facilities
Brownfields and Environmental Restoration Program

cc: See next page.

cc: Mr. Mark Hall, REM
Environmental Protection Specialist
USAG Camp Parks DPW/ENV
Camp Parks, California 94568-5201

Mr. George Leyva, PG
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

ENCLOSURE 16
GROUNDWATER MONITORING WELL REMOVAL CONCURRENCE LETTER

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March 23, 2015
ECM No. DOD100365100 (MB)

Camp Parks Reserve Forces Training Area
Attn. Mr. Mark Hall
620 6th Street
Dublin, CA 94568

SUBJECT: Concurrence - PRFTA-02 Groundwater Monitoring Well Removal Request, Camp Parks, Dublin, Alameda County

Dear Mr. Hall:

Regional Water Board staff have completed additional review of dioxin groundwater monitoring data associated with monitoring wells located in PRFTA -02 that are slated for removal. The information garnered during our additional review allows us to concur with your proposal for removing seven wells at PRFTA 2 (MW-03/03R, MW-04, MW-08, MW-09, MW-10, MW-11, and MW-12). Please find presented below a summary of our review efforts and our rationale for concurrence.

Review Efforts and Rationale for Concurrence

Regional Water Board staff reviewed a monitoring well removal request, dated July 31, 2014, and supplementary data received January 30, 2015, and February 9 and 10, 2015, and concurred with the removal of background monitoring well MW-SEQ-07 (RPX), three background wells (MW-BKG-01, -02, and -03 – Northern Cantonment), and two test wells (TW-L3 and TW-L1 – Test Wells). However, staff did not concur that the seven wells located in PRFTA-02 (MW-03/03R, MW-04, MW-08, MW-09, MW-10, MW-11, and MW-12) should be removed because the data provided did not sufficiently demonstrate that dioxin in the groundwater would not adversely impact aquatic life in the unnamed creek (tributary to Arroyo de la Laguna and Alameda Creek) located to the west and within 100 feet of the dioxin impacted groundwater.

Specifically, the data indicated that the groundwater dioxin concentrations were lower before the soil excavation, increased after the soil excavation, then decreased sharply during the last

monitoring quarter, and remained at concentrations near surface water screening levels for fresh water habitats [1].

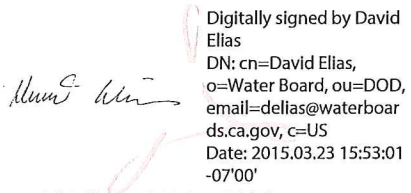
Due to the concentration trend uncertainty discussed above, we reviewed the analytical laboratory reports for dioxins in groundwater for the 17 congeners for the November 2013 and January 2014 sampling periods for wells MW-03/03R, MW-04, MW-08, MW-09, MW-10, MW-11, and MW-12. We also reviewed the calculations for the congener summation, and a description of how non-detects were handled during the summation calculations.

Based on this review, we determined that the calculation method used was conservative and resulted in falsely elevated dioxin concentrations. Using a different calculation method, we determined that the dioxin concentrations were low and are not likely to pose a threat to surface water. In addition, the current land use is industrial/commercial under the Army's Installation Master Plan. A deed covenant will be required by the Army at the time of transfer that will restrict the site from residential use and it is not likely that groundwater will be used for potable supply at any time in the foreseeable future.

Closing

If you have any questions, please contact Margarete Beth of my staff at (510) 622-2338 or by email at Margarete.Beth@waterboards.ca.gov

Sincerely,



David Elias CEG, CHG
Senior Engineering Geologist
Ground Water Protection Division

CC:
Thomas Ervin, thomas.l.ervin3.ctr@mail.mil
Dominique Forrester, Dominique.Forrester@dtsc.ca.gov

[1] Dioxin (2,3,7,8-TCDD) Screening Level: 5.0E-06 µg/L – Surface Water Screening Levels Fresh Water Habitats (Table F-2a Groundwater Screen Levels – groundwater is a current or potential drinking water resource) Environmental Screening Levels – S.F. Bay RWQCB, December 2013

ENCLOSURE 17
SITE CLOSURE LETTER WITH CONCURRENCE

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CLOSURE CERTIFICATION
IRP SITE PRFTA-02, BUILDING 109 INCINERATOR
PARKS RESERVE FORCES TRAINING AREA

Statement of Basis

This Closure Certification presents the selected decision for Installation Restoration Program (IRP) Site PRFTA-02 located at the PRFTA installation, California. The selected decision is based on the results of the Removal Action conducted in 2013 as documented in the Removal Action Completion Report (URS, 2014) conducted for the site.

The selected decision was made in accordance with the Defense Environmental Restoration Program (DERP), 10 United States Code (USC) 2701, and is consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9601), Executive Order 12580 (52 Federal Register 2923), as amended by the Superfund Amendments and Reauthorization Act, and to the extent practicable, with the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300.

The State of California Department of Toxic Substances Control and the San Francisco Bay Regional Water Quality Control Board previously reviewed the supporting documentation and are concurring with the closure certification.

Description of the Selected Action

Based on the Removal Action Completion Report results, the Army has determined that sufficient information has been collected to conclude that the environmental condition of IRP Site PRFTA-02 does not pose an unacceptable risk to public health or the environment when the site is used under commercial or industrial land use conditions. Therefore, IRP Site PRFTA-02 meets the criteria for the goals outlined in the DERP guidance (U.S. Department of Defense, 2001), which states that the goals of the program shall include the identification, investigation, research and development, and cleanup of contamination from hazardous substances, and pollutants and contaminants.

Declaration of Statutory Determinations

The selected decision of site closure is protective of human health and the environment, and is cost-effective. Federal and state applicable or relevant and appropriate requirements (ARARs) were met during the removal action,

The statutory preference for further treatment is not required because, based on chemical concentrations detected in soil and groundwater, the site does not pose potentially unacceptable risks to human health or the environment when the site is used under commercial or industrial land use conditions. The site closure criteria have been met and, therefore, IRP Site PRFTA-02 qualifies for closure.

Authorizing Signatures

The Army has determined that no further response action is necessary under CERCLA to protect human health and the environment under commercial or industrial land use conditions at IRP Site PRFTA-02 (Former Building 109 Incinerator) located at the PRFTA installation in California.

Andrew W. Jones
Lieutenant Colonel, U.S. Army
Commanding

20150610
Date

John Hart, PE
Supervising Hazardous Substances Engineer I
State of California Department of
Toxic Substances Control

6-19-15
Date

ENCLOSURE 18
ENVIRONNMENTAL CONDITION OF PROPERTY RECERTIFICATION LETTER

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