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FINAL PHASE II
FINDING OF SUITABILITY TO TRANSFER
DEPARTMENT OF DEFENSE HOUSING FACILITY
NOVATO, CALIFORNIA

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Prepared by

Tetra Tech EM, Inc.
135 Main Street, Suite 1800
San Francisco, California

Uribe & Associates
2930 Lakeshore Avenue, Suite 200
Oakland, California

Ms. Jordie Bornstein, TtEMI Project Manager

Mr. John C. Borrego, R.G., U&A Project Manager

CONTENTS

Section **Page**

1.0 PURPOSE 1

1.1 INTRODUCTION 1
1.2 DOCUMENTS REVIEWED AND REFERENCED 1

2.0 PROPERTY DESCRIPTION 5

3.0 REGULATORY COORDINATION 6

4.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE 6

5.0 ENVIRONMENTAL BASELINE SURVEY FINDINGS 6

5.1 ECP AREA TYPE 7
5.2 STORM SEWER SYSTEM 7
5.3 SUMMARY OF RESOLUTIONS OF ENVIRONMENTAL ISSUES 7
5.3.1 Parcel 2A 8
5.3.2 Parcel 8 9
5.3.3 Parcel 9 9
5.3.4 Parcel 12 9
5.3.5 Parcel 54 9
5.3.6 Parcel 55A 10
5.3.7 Parcel 64 11
5.3.8 Parcel 72 11
5.3.9 Parcel 104 11

6.0 POTENTIAL IMPACT FROM ADJACENT PROPERTY 12

6.1 UST 827 SITE 12
6.2 UST 957/970 SITE 13
6.3 OTHER PARCELS 14

7.0 NOTICE OF HAZARDOUS SUBSTANCES 14

8.0 DISCLOSURE ISSUES 15

8.1 ASBESTOS 15
8.2 LEAD-BASED PAINT 16

CONTENTS (Continued)

Section **Page**

8.3 RADON 19
8.5 PESTICIDE USAGE 20
8.5.1 Pesticides Used 21
8.5.2 Pesticide Management 21

9.0 SUMMARY OF NOTIFICATIONS AND RESTRICTIONS 22

9.1 NOTIFICATIONS 22
9.2 RESTRICTIONS 23

10.0 REQUIRED ENVIRONMENTAL COVENANTS 24

11.0 FINDING OF SUITABILITY TO TRANSFER 26

TABLES

Table

1 PROPERTY DESCRIPTIONS 27
2 ENVIRONMENTAL CONDITION OF PROPERTY AREA TYPE DEFINITIONS 28
3 SUMMARY OF ECP AREA TYPES FOR PARCELS IN THE PHASE II FOST 29
4 BUILDINGS WITH ACM HAZARD ABATEMENT 30
5 BUILDINGS PLANNED FOR DEMOLITION LOCATED ON PARCELS INCLUDED IN THIS FOST 30

FIGURES

Figure

1 SITE LOCATION MAP
2 ENVIRONMENTAL CONDITION OF PROPERTY AREA TYPE CLASSIFICATION MAP FOR PARCELS IN THIS FOST
3 AREA OF CONCERN NEAR PARCELS IN THIS FOST

1.0 PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document environmental findings regarding the proposed deed of property at the Department of Defense Housing Facility Novato (DODHF Novato). DODHF Novato includes housing and the associated facilities portion of the former Hamilton Army Airfield.

1.1 INTRODUCTION

The "Hamilton Army Airfield Final Reuse Plan" (Reuse Plan, Bein et. al. 1995 as amended by the City of Novato in 1996) recommends the transfer of property at DODHF Novato to the City of Novato and the United States Coast Guard (USCG). The property to be transferred in this FOST includes individual parcels at DODHF Novato, rather than the entire facility. This FOST includes nine of the 126 distinct, Navy-owned parcels at DODHF Novato (Parcels 2A, 8, 9, 12, 54, 55A, 64, 72, and 104). The area covered by these parcels is referred to as the property. Parcels 2A and 55A are portions of previously defined Parcels 2 and 55 which are ready to be transferred. The other portions of Parcels 2 and 55 (now labeled 2B and 55B) are not ready for transfer due to outstanding environmental issues (including migration of groundwater contamination to Parcel 2B from Parcel 4 and lead-based paint remediation in the Capehart Housing area on Parcel 55B). Figure 1 depicts the areas of the facility to be transferred in this FOST. The remaining parcels and portions of parcels at DODHF Novato are not covered by this FOST. This Finding of Suitability to Transfer was prepared in accordance with the Department of Defense (DOD) Policy "Finding of Suitability to Transfer for BRAC Property," (DOD 1994a). The Reuse Plan identifies both commercial and open space uses for parcels covered by this FOST. The parcels included in this FOST have been evaluated based on a residential reuse scenario.

1.2 DOCUMENTS REVIEWED AND REFERENCED

This FOST is the result of a thorough analysis of information contained in the following documents:

- "Finding of Suitability to Transfer for BRAC Property," Department of Defense (DOD) policy, dated June 1, 1994 (DOD 1994a).

- "Asbestos, Lead Paint, and Radon Policies at BRAC Properties." Memorandum from Office of the Under Secretary of Defense, October 31, 1994 (DOD 1994b)

- "Limited Community Environmental Response Facilitation Act (CERFA) Environmental Baseline Survey." Prepared by ERM-West, Inc. (ERM-West), November 1994 (ERM-West 1994).

- "Basewide Environmental Baseline Survey (EBS)/Community Environmental Response Facilitation Act Report for DODHF-Novato." Prepared by ERM-West, October 1995 (ERM-West 1995).

- "Hamilton Army Airfield Reuse Plan - Final Reuse Plan." Prepared by Robert Bein, et. al., October 1995, as amended by the City of Novato in 1996 (Bein 1995).

- "Pest Management Plans, Department of Defense Housing Facility, Novato." Prepared by Public Works Center (PWC) San Francisco, 1987 through 1995 (PWC San Francisco 1987 to 1995).

- "Lead Management Plan, Community Center, DOD Novato, CA." Prepared by PWC Norfolk February, 1996 (PWC Norfolk 1996).

- "Lead-Based Paint at BRAC Installations." Prepared by Commander, Naval Facilities Engineering Command (NAVFAC), Letter 5090 41CM/960102 April 1996 (NAVFAC 1996).

- "Application for Public Benefit Transfer of Surplus Federal Real Property for Educational Uses." Prepared by the Novato Unified School District (NUSD), May 1996 (NUSD 1996).

- "PCB Survey of Oil-filled Electrical Equipment." Prepared by PWC San Francisco, November 1996 (PWC San Francisco 1996).

- "Base Realignment and Closure Cleanup Plan Update, Revision 03, Department of Defense Housing Facility, Novato." Prepared by PRC Environmental Management Inc. (PRC) and Uribe & Associates (U&A), February 25, 1997 (PRC EMI and U&A 1997a).

- "Final Environmental Baseline Survey Sampling and Analysis Screening Level Report for DODHF Novato." Prepared by PRC and U&A, April 15, 1997 (PRC and U&A 1997b).

- "Final EBS Follow-UP Sampling Addendum Report for DODHF Novato" Prepared by PRC and U&A , August 4, 1997 (PRC and U&A 1997)

- "Final Phase I Supplemental Environmental Baseline Survey (SEBS) for Department of Defense Housing Facility, Novato." Prepared by PRC and U&A, April 21, 1997 (PRC and U&A 1997c).

- "Sampling Report, Department of Toxic Substances Control, Department of Defense Housing Facility Novato, Non-Residential Housing." Prepared by California Environmental Protection Agency, (Cal-EPA) Department of Toxic Substances Control (DTSC) April 30, 1997 (DTSC 1997a).

- "Underground Storage Tank (UST) Case Building 203, DODHF, Novato - UST Closure Letter." Prepared by Cal-EPA Regional Water Quality Control Board (RWQCB), San Francisco Bay, June 6, 1997 (RWQCB 1997).

- "Inspection Report, Department of Toxic Substances Control, Department of Defense Housing Facility Novato, Non-Residential Housing." Prepared by DTSC June 14, 1997 (DTSC 1997b).

- "Request for Concurrence on Uncontaminated Property for the Department of Defense Housing Facility (DODHF), Novato, California." Prepared by DTSC, June 23, 1997 (DTSC 1997c).

- "No Further Action, Department of Defense Housing Facility (DODHF), Novato, California." Prepared by DTSC, June 30, 1997 (DTSC 1997d).

- "Field Summary Report, Storm Drain Cleanout and Sediment Removal, DOD [Department of Defense] Housing Facility Novato, California." Prepared by IT Corporation (IT), July 1997 (IT 1997).

- "Draft-Final UST Investigation Report for Former Underground Storage Tank site 957/970, at Department of Defense Housing, Hamilton Field, Novato, California." Prepared by ERM West, September 1997 (ERM West 1997).

- "Third Quarter 1997 Groundwater Monitoring Report for the Underground Storage Tank Site at Building 827, Department of Defense Housing Facility Novato, California." Prepared by AGS, Inc., November 1997 (AGS 1997~~b~~a).

- "Work Plan for Soil and Groundwater Remediation at Department of Defense Housing Facility, Hamilton Field, Novato, California." Prepared for EFA West by Battelle, November 1997 (Battelle 1997).

- "Final Environmental Impact Statement for the Disposal and Reuse of DODHF Novato." Prepared by Engineering Field Activity West (EFA West) Naval Facilities Engineering Command, November 1997 (EFA West 1997).

- "No Further Action, Department of Defense Housing Facility (DODHF), Novato, California." Prepared by DTSC, December 8, 1997 (DTSC 1997e).

- "Request for Concurrence on Uncontaminated Property for The Department of Defense Housing Facility (DODHF), Novato, California." Prepared by DTSC, December 8, 1997 (DTSC 1997f).

- "Asbestos Building Survey Report." Prepared by SSPORTS Environmental Detachment, January 1998 (SSPORTS 1998a).

- "Letter Report on Sampling of Groundwater at Parcel 55, Department of Defense Housing Facility, Novato." Prepared by Tetra Tech EM Inc. (TtEMI) and U&A, February 1998 (TtEMI and U&A 1998).

- "Asbestos Remediation Completion Report for Non-residential Buildings, DOD Housing Facility Novato, Novato California." Prepared by SSPORTS April 1998 (SSPORTS 1998b).

- "Final UST Investigation Report for Former Underground Storage Tank Site 957/970 at Department of Defense Housing Facility, Hamilton Field, Novato California." Prepared by ERM West in June 1998 (ERM West 1998).

- "Lead Contaminated Soil Removal Concurrence for Day Care Center, Building 531/Parcel 72, Department of Defense (DoD) Novato Housing, Novato, California." Prepared by DTSC June 19, 1998 (DTSC 1998a)

- "Technical Monthly Report: UST 957/970 Remediation Project, DODHF Novato, California." Prepared by Battelle June 23, 1998 (Battelle 1998).

- "Polychlorinated Biphenyl (PCB) Inventory and Removal Report for High Voltage PCB Electrical Devices, Department of Defense Housing Facility (DODHF), Novato, California." Prepared by SSPORTS June 26, 1998 (SSPORTS 1998c).

- "Field Summary Report for Lead Based Paint in Soil Removal Action at Building 531 (Former Chapel), DOD Novato Housing, Novato, California. Prepared by SSPORTS February 17, 1998 (SSPORTS 1998d)

- "Fourth Quarter 1997 Groundwater Monitoring Report for the Underground Storage Tank Site at Building 827, Department of Defense Housing Facility Novato, California." Prepared by AGS, Inc., June 1998 (AGS 1998a).

- "Revised Draft Final Report Remedial Investigation and Corrective Measures Study for the Underground Storage Tank Site at building 827" Prepared by AGS Inc., July 1998 (AGS 1998b)

- "Record of Decision for the Disposal and Reuse of the The Department of Defense Housing Facility Novato, California" Signed by William J. Cassidy Jr., Deputy Assistant Secretary of the Navy on July 1, 1998 (Navy 1998).

- "First Quarter 1998 Groundwater Monitoring Report for the Underground Storage Tank Site at Building 827, Department Defense Housing Facility Novato, California" Prepared by AGS, inc., July 1998 (AGS 1998c).

- " Second Quarter 1998 Groundwater Monitoring Report for the Underground Storage Tank Site at Building 827, Department of Defense Housing Facility Novato, California" Prepared by AGS, Inc., July 1998 (AGS 1998d).

- "August 1998 Technical Monthly Report: UST 957/970 Remediation Project, DODHF Novato, California." Prepared by Batelle September 25,1998 (Batelle 1998b).

- Field Summary Report for Abatement of Exterior Lead Based Paint, Building 531 (Former Chapel), DOD Novato Housing, Novato, California." Prepared by SSPORTS October 20,1998 (SSPORTS 1998e).

- "Third Quarter 1998 Groundwater Monitoring Report for the Underground Storage Tank Site at Building 827, Department of Defense Housing Facility Novato, California" Prepared by AGS, Inc., January 1999 (AGS 1999a).

- November Technical Monthly Report: UST 957/970 Remediation Project, DODHF Novato, California". Prepared by Batelle January 6,1999 (Batelle 1999).

- "Supplemental Asbestos Remediation Completion Report for Eleven Non-Residential Buildings, Prepared by SSPORTS February 1999 (SSPORTS 1999a).

- "Approval of No Further Action for Parcels 2A, 55A, and 72, Navy Phase II Property, Department of Defense Housing Authority, Hamilton Air Force Base, Novato, California." Prepared by DTSC September 9, 1998 (DTSC 1998b).

2.0 PROPERTY DESCRIPTION

DODHF Novato is located on the eastern edge of the City of Novato adjacent to San Pablo Bay, in Marin County, California, approximately 25 miles north of San Francisco (Figure 1). DODHF Novato covers approximately 554 acres. Approximately 10.2 total acres of DODHF Novato are included as part of this FOST. Individual buildings and acreages of the parcels included in this FOST are listed in Table 1. Subsurface utilities on the property covered by this FOST include sanitary sewer, storm drain, electricity, water, and natural gas lines.

3.0 REGULATORY COORDINATION

Representatives of the United States Environmental Protection Agency (EPA), the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC), and the San Francisco Bay Regional Water Quality Control Board (RWQCB) have been involved in a consultative role with the Navy throughout the preparation of the EBS, SEBS, and FOST for DODHF Novato. Regulatory comments received during the EBS, SEBS, and FOST development have been reviewed and incorporated, as appropriate, into the documents. In addition, a public notice has been issued on the Navy's intent to sign a Finding of Suitability to Transfer and comments have been solicited from the public.

4.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE

An Environmental Impact Statement (EIS) was prepared for the DODHF Novato property in accordance with the requirements of the National Environmental Policy Act (NEPA) and the Navy's environmental and natural resources program manual (OPNAVINST 5090.1B). The EIS presents the analysis of potential significant impacts of the Navy disposal and community reuse of DODHF Novato (EFA West 1997). The Final EIS shall accompany this FOST.

The record of decision (ROD) for the NEPA document was signed on July 1, 1998 (Navy 1998). NEPA land use evaluations are necessary for changes in property use which may potentially impact the environment. NEPA evaluations allow for public participation and evaluation of potential impacts to people and the environment from changes in land use.

5.0 ENVIRONMENTAL BASELINE SURVEY FINDINGS

As part of the initial Basewide EBS conducted for DODHF Novato, each parcel was assessed individually to identify the potential environmental concerns (ERM West 1995). An environmental condition of property (ECP) area type classification from 1 to 7 was assigned to each parcel. The Phase I Supplemental EBS (PRC and U&A 1997c) was later prepared to include additional information and investigations conducted since the completion of the Basewide EBS. Since completion of the Supplemental EBS, additional remediation and investigations have been conducted. The additional information is summarized in this FOST.

ECP area type definitions are included in Table 2. Parcels with ECP area types 1, 2-3, 3, and 4 are included in this FOST.

5.1 ECP AREA TYPE

The ECP area type classification scheme was developed as a result of the 1997 Defense Authorization Act which revised the definition of "uncontaminated" property. Category definitions previously referred to in the Basewide EBS as "CERFA categories" or "Base Realignment and Closure (BRAC) area types" are now referred to as ECP area types. Table 3 lists each parcel covered by this FOST along with its ECP area type classification and notes regarding classifications. In summary, the property is either ECP area type 1, areas where no hazardous substance or petroleum release or disposal (including migration) has occurred; ECP area type 2-3, areas where only release or disposal of petroleum products has been detected below action levels; ECP area type 3, areas of hazardous substance contamination below action levels; or ECP area type 4, areas where all hazardous substance remedial action has been taken.

5.2 STORM SEWER SYSTEM

Based on sampling results and recommendations from the "Final Environmental Baseline Survey Sampling and Analysis Screening Level Report" (PRC and U&A 1997), the Navy cleaned selected storm sewer locations in the vicinity of Parcels 8, 9, 12, 55, and 64. A report summarizing these activities was submitted to the regulatory agencies in July 1997 (IT 1997). The DTSC concluded that "all necessary remedial action" has been completed with respect to storm drains on these parcels (DTSC 1997e).

5.3 SUMMARY OF RESOLUTIONS OF ENVIRONMENTAL ISSUES

The Supplemental EBS identified ECP area types for each parcel at DODHF Novato (PRC and U&A 1997c). Since the final Supplemental EBS was completed in April 1997, a number of the outstanding environmental issues have been resolved. The parcels covered in this FOST has been re-classified, with the concurrence of the regulatory agencies, based on the revised ECP area type definitions and information gathered from site investigations and literature reviews conducted since the completion of the Basewide EBS and the SEBS. The following subsections

identify the outstanding issue at the time of the Supplemental EBS and the current status for each parcel. Notifications or restrictions required for a parcel reuse are identified at the end of the parcel's sub-section.

5.3.1 Parcel 2A

In order to facilitate reuse, Parcel 2 has been divided into a north portion (Parcel 2A, 0.70 acres) and a south portion (Parcel 2B, 0.12 acres). The separation of this parcel allows for the planned redevelopment, as the permanent Hamilton Service Center (a community social service center), of Parcel 2A, to take place in a timely manner.

Parcel 2, in its entirety, was classified as ECP area type 6 due to the potential for solvent contamination migration from UST 827 on Parcel 4 (PRC and U&A 1997c). As detailed in Section 6.1 and presented on Figure 3, current monitoring, sampling, and analysis do not indicate that contaminant migration from Parcel 4 to Parcel 2A has occurred (AGS 1998b).

However, information presented in the SEBS indicates that concentrations of total petroleum hydrocarbons (TPH) were detected below the screening criterion on the portion of Parcel 2 now referred to as Parcel 2A (PRC and U&A 1997b). Based on the no further action letter (DTSC 1998b) and detected TPH concentrations, Parcel 2A is reclassified to ECP area type 2-3.

Notifications. The following are notifications with respect to the ongoing investigation activities adjacent to Parcel 2A:

- Property adjacent to this parcel is undergoing an investigation of hazardous substance release.
- The Navy and applicable regulatory agencies will be allowed unrestricted access to enter the property to conduct investigations, surveys, collect samples, perform remediation, access monitoring wells, or engage in other activities associated with environmental concerns the site (i.e. the potential for migration from the adjacent Parcels 2B and 4).

5.3.2 Parcel 8

Parcel 8 was classified as ECP area type 6 due to potential contamination in the storm drains. A report of the storm drain cleaning activities was submitted to the regulatory agencies in July 1997 (IT 1997). The DTSC concurred that "all necessary remedial action" has been completed with respect to storm drains on this parcel (DTSC 1997e). As a result, Parcel 8 is reclassified as ECP area type 4.

5.3.3 Parcel 9

Parcel 9 was classified as ECP area type 6 due to potential contamination in the storm drains. A report of the storm drain cleaning activities was submitted to the regulatory agencies in July 1997 (IT 1997). In this report, it was documented that the storm drains did not actually cross Parcel 9; as such it appears that there are no storm drains on the parcel. Based on the storm drain report and the DTSC concurrence letter (DTSC 1997f), Parcel 9 is reclassified as ECP area type 1.

5.3.4 Parcel 12

Parcel 12 was classified as ECP area type 6 due to potential contamination in the storm drains. A report of the storm drain cleaning activities was submitted to the regulatory agencies in July 1997 (IT 1997). The DTSC concurred that "all necessary remedial action" has been completed with respect to storm drains on this parcel (DTSC 1997e). Based on the June 30, 1997 DTSC no further action letter and the December 8, 1997 DTSC no further action letter, Parcel 12 is reclassified as ECP area type 3.

5.3.5 Parcel 54

Parcel 54 was classified as ECP area type 2-6 due to unknown extent of petroleum contamination. Follow-up sampling indicated release of petroleum below action levels (PRC and U&A 1997). The RWQCB and DTSC concurred that no further action was necessary (DTSC 1997e). As a result, Parcel 54 is reclassified as ECP area type 2-3.

In the Supplemental EBS (PRC and U&A 1997c) and subsequent non-residential lead-based paint (LBP) evaluations (DTSC 1997a and b), it was assumed that Building 1000 on Parcel 54 was to be demolished. However, the current application for public benefit conveyance from the Novato school district indicates that Building 1000 would be used for storage by the adjacent elementary school in the near term. However, the long term plans (greater than 3 years) still indicate that Building 1000 will be demolished. The remainder of Parcel 54 is planned to remain a parking lot and open space. The ECP Type is ECP 3 as discussed in Section 8.2. Therefore, the covenant that is required for property where there has been a release of a hazardous substance will be used for this parcel.

5.3.6 Parcel 55A

Parcel 55 was classified as ECP area type 7 due to potential contamination in the storm drains. A report of the storm drain cleaning activities was submitted to the regulatory agencies in July 1997 (IT 1997). The DTSC concurred that "all necessary remedial action" has been completed with respect to storm drains on these parcels (DTSC 1997e). Parcel 55 has been divided into two portions at the location of the drainage creek running across the parcel, perpendicular to Main Gate Road. The portion to the west is Parcel 55A (1.73 acres) and the portion to the east is Parcel 55B (1.73 acres). The portion identified as Parcel 55A is open space and is included in this FOST. Parcel 55B is within the Capehart housing area and includes several residential structures. Since lead in soil from LBP at the Capehart Housing area is currently undefined, this issue prevents Parcel 55B from transfer. Since there were some sediments removed that contained hazardous substances, the covenant required is for property where there has been a release of hazardous substances.

The UST 957/970 Site is located on Parcel 29 across Main Gate Road to the north of Parcel 55A. One groundwater sample was collected from Parcel 55A in 1997. Low levels of TPH, ethylbenzene, and xylene were detected in this sample (ERM West 1997). The results of the groundwater samples collected between this sample and UST 957/970 site (sample locations 970-W8, 970W-17, 970-W48, 970-W51,and 970W-53), indicated that the constituents detected were most likely unrepresentative of the local groundwater conditions. One confirmation sample was collected from approximately the same location to verify these results in 1998. TPH and BTEX were not detected in the second sample. Thus, the initial

results appear to be anomalous. A groundwater remediation program is underway for the UST 957/970 site, which will reduce the potential for contaminant migration from Parcel 29 to Parcel 55A (Battelle 1997). No impact to Parcel 55A is anticipated from the UST 957/970 Site. Based on the DTSC No Further Action Letter dated September 9, 1998, the ECP area type of Parcel 55A is reclassified to ECP area type 2-3 (DTSC 1998b).

5.3.7 Parcel 64

Parcel 64 was classified as ECP area type 6 due to potential contamination in the storm drains. A report of the storm drain cleaning activities was submitted to the regulatory agencies in July 1997 (IT 1997). The DTSC concurred that "all necessary remedial action" has been completed with respect to storm drains on these parcels (DTSC 1997e). As a result, Parcel 64 is reclassified as ECP area type 4.

5.3.8 Parcel 72

Parcel 72 was classified as ECP area type 1. The DTSC conducted sampling and analysis activities for lead at Building 531, Child Care Center, on Parcel 72 (DTSC 1997a). Lead was detected in soil at concentrations above action levels (DTSC 1997a). As a result, the Navy conducted a soil removal and lead-based paint abatement.

During the asbestos survey conducted by SSPORTS, damaged, friable, and accessible asbestos containing material (ACM) was identified in the crawl space of the building (SSPORTS 1998a). Abatement of ACM is complete. The abatement activities are discussed in two SSPORTS reports (SSPORTS 1998b and 1998d). Based on the removal and confirmation sampling for lead and the abatement of ACM, Parcel 72 is classified as ECP area type 4 (DTSC 1998a and b).

5.3.9 Parcel 104

Parcel 104 was classified as ECP area type 2-6 due to petroleum detected during UST 203 removal. Based on concentrations detected below action levels, the UST site received a closure letter from the RWQCB on June 6, 1997 (RWQCB 1997a). Lead in soil from LBP was also a potential issue for Building 203, the Community Center, at this parcel. However, lead was not

detected above action levels in soil surrounding the building (PWC Norfolk 1996). Based on the UST closure, results of lead survey and the DTSC "no further action" letter of December 8, 1997 (DTSC 1997e), Parcel 104 is reclassified as ECP area type 3.

6.0 POTENTIAL IMPACT FROM ADJACENT PROPERTY

The section summarizes the potential for impact from property adjacent to the area of this FOST. After review of the basewide EBS and SEBS for DODHF Novato, two contaminant source areas have been identified adjacent to the parcels within this FOST.

6.1 UST 827 SITE

The UST 827 Site is located on Parcel 4 south of Parcel 2A which is included in this FOST. In May 1996, four USTs were removed from Parcel 4 and sample results at the time indicated petroleum release from the USTs. The investigation of the site to date is reported in the "Revised Draft Final Remedial Investigation and Corrective Measures Study for the Underground Storage Tank Site at Building 827, Department of Defense Housing Facility, Novato, California," prepared by AGS in July 1998 (AGS 1998b). An additional report on groundwater monitoring was submitted in November 1997 (AGS 1997a, AGS 1998a, AGS 1998b, AGS 1998c, AGS 1998d, AGS 1999a).

The investigation of the UST 827 Site included an analysis of site characteristics, previous investigations, geology and hydrogeology, as well as chemical analysis of soil and groundwater, and a remediation assessment. The lateral and vertical extent of soil and groundwater contamination at the site was characterized. Analyses of 37 soil samples from 16 borings and 22 groundwater samples from 15 sampling locations indicated the presence of contamination at residual levels underlying the site. Hydrocarbon contamination in the gasoline to diesel range was detected in shallow soil in the vicinity of subsurface pipelines, and petroleum hydrocarbons and volatile organic compounds were detected in groundwater. Specifically, concentrations of TPH-gasoline, TPH-diesel, toluene, ethylbenzene, xylene, chlorobenzene, 1,2-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, dichloropropane, perchlorethylene (PCE), trichloroethene (TCE), and vinyl chloride were detected in grab groundwater samples collected adjacent to the removed USTs on Parcel 4 (AGS 1998b). TPH-gasoline, TPH-diesel, methyl-

tertiary-butyl-ether (MTBE), 1,2-dichloroethane, cis-1,2-dichloroethene, PCE, and TCE have been detected in groundwater monitoring wells installed around the site (AGS 1998b). Many of these compounds have been detected at concentrations only slightly above the detection limit in the groundwater samples (AGS 1998b).

The low levels of contamination detected are consistent with the estimated termination of operations in Building 827 in 1974 and the removal of the source (USTs) in 1996. Minimal spatial and temporal change in the plume configuration suggests the presence of a stable plume and the occurrence of biodegradation (AGS 1998b). Additional removals will be conducted by the Navy to excavate the pipelines and highly contaminated soil to eliminate potential secondary sources of contamination. Additional groundwater monitoring wells were installed and sampled in early May 1998 at the downgradient edge of the plume.

A risk based corrective action (RBCA) study was conducted to provide a quantitative and qualitative evaluation of the detected concentrations, extent of contamination, and potential exposure pathways. This study generated site-specific target levels (SSTLs) to evaluate the site's potential for risk to human or ecological health. The SSTLs represent hypothetical soil and groundwater concentrations at the UST 827 Site, which when transported to the discharge point, are protective of human or ecological health. Comparison of the maximum concentrations detected at the site to the calculated SSTLs indicates that the concentrations of contaminants do not pose a risk to receptors above EPA target risk ranges (AGS 1998b).

At this time, the plume is located on Parcel 4 and extends onto Parcel 2B. Figure 3 includes a sketch of the approximate extent of groundwater affected by the UST 827 release. No impact to the property in this FOST (Parcel 2A) is anticipated from the plume on Parcel 2B and Parcel 4.

6.2 UST 957/970 SITE

Migration of petroleum products has occurred in the general direction of Parcels 9 and 12 from the UST 957/970 Site (ERM West 1997). A groundwater plume of TPH-gasoline, and benzene, toluene, ethylbenzene and xylenes (BTEX) extends from the UST area on Parcel 29 to approximately 1000 feet from Parcels 9 and 12 (Figure 3). A plume of MTBE also extends in the general direction of Parcels 9 and 12. Additional groundwater sampling data from Parcel 15

and 16 indicate that Parcels 9 and 12 are not directly down gradient of the MTBE plume (Battelle 1998, Batelle 1998b, Batelle 1999). Parcel 55A is upgradient of the UST site and samples collected did not indicate concentrations of MTBE. A groundwater remediation program is underway, which should reduce the potential for additional migration (Battelle 1997). No impact to the property in this FOST (Parcels 9, 12, or 55A) is anticipated from the UST 957/970 Site.

6.3 OTHER PARCELS

Other parcels in this FOST are primarily adjacent to parcels which are CERFA uncontaminated, ECP area type 2-3, or ECP area type 3 due to non-residential lead based paint release potential. Parcel 8 is adjacent to Parcel 3 (ECP area type 3), Parcel 5 (ECP area type 1), Parcel 7 (ECP area type 3), Parcel 9 (ECP area type 1), and Parcel 12 (ECP area type 3). Parcel 55A is adjacent to Parcel 54 (ECP area type 2-3), Parcel 55B (Capehart Housing Area lead issue), and Parcel 64 (ECP area type 4). Parcel 64 is adjacent to Parcel 65B (Capehart Housing Area lead issue), Parcel 55A (ECP area type 2-3), and off site areas (basewide EBS did not identify potential concerns on adjacent property). Parcel 72 is adjacent to Parcels 69 (ECP area type 3), Parcel 70 (ECP area type 1), Parcel 71 (ECP area type 3), and off-site areas (basewide EBS did not identify potential concerns on adjacent property). Parcel 104 is surrounded by Parcel 105A (ECP area type 3). Since, Parcels 8, 55A, 64, 72, and 104 are adjacent to primarily uncontaminated areas, no impacts from adjacent property are anticipated.

7.0 NOTICE OF HAZARDOUS SUBSTANCES

Hazardous substances were stored on several parcels in this FOST as a part of routine activities. The SEBS provides a parcel-by-parcel description of the hazardous substances stored, released, or disposed at DODHF Novato. As required by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Section 120(h)(1) and 120(h)(3) and implemented by 40 Code of Federal Regulations 373.3, hazardous substances notification must be made for certain quantities and duration of hazardous substances storage.

The notice applies to hazardous substances that have been stored for greater than one year, and in quantities greater than or equal to 1,000 kilograms or the substance's CERCLA reportable

quantity, whichever is greater. The notice also applies to the release or disposal of hazardous substances greater than or equal to the substance's CERCLA reportable quantity. A review of the Basewide EBS and documents from PWC San Francisco found no parcels in this FOST where the storage of hazardous substances would require the inclusion of this notice.

8.0 DISCLOSURE ISSUES

This section lists those items which were identified as potential environmental concerns in the basewide EBS, and those disclosure issues which are required to be included in transfer documents.

Factors or resources which would not preclude or restrict real property transactions are asbestos (refer to Section 8.1), lead-based paint (refer to Section 8.2), radon (refer to Section 8.3), polychlorinated biphenyls (PCBs) (refer to Section 8.4), and pesticide usage (refer to Section 8.5). Although these factors and resources would not preclude transactions, some use constraints (e.g., deed restrictions) may be necessary and disclosure to the transferee is required.

8.1 ASBESTOS

Basewide asbestos surveys have been conducted to identify areas potentially posing a hazard due to the presence of damaged, friable, and accessible asbestos. The mere presence of asbestos in a building does not preclude the parcel from transfer; however, asbestos that poses a threat to human health (e.g., asbestos-containing material [ACM] which is friable, damaged, and accessible) must be abated prior to transfer of the parcel.

The non-residential buildings were surveyed for asbestos in September 1995 by PWC San Francisco, California and re-surveyed by SSPORTS Environmental Detachment in November and December of 1997. Damaged, friable, and accessible ACM was identified in Building 816 (Parcel 8), Building 1000 (Parcel 54), Building 531 (Parcel 72), and Building 203 (Parcel 104) (SSPORTS 1998a). Abatement of damaged, friable, and accessible ACM found in the non-residential buildings is complete. The ACM abatement included accessible crawl spaces, where applicable. Table 4 lists the abatement activities conducted in each building. ACM was identified in Building 803 on Parcel 12, but was not the damaged, friable, or accessible ACM requiring abatement.

Copies of the Asbestos Survey Report (SSPORTS 1998a), the ACM abatement report for non-residential buildings (SSPORTS 1998b), and Supplemental Asbestos Remediation Completion Report (SSPORTS 1999a) will be provided to the recipients of the property.

Notifications. The notification for the transfer documents is the following:

Upon the completion of the asbestos abatement project and prior to transfer, this section serves as a notification that ACM exists in buildings on Parcels 8, 12, 54, 72, and 104 at DODHF Novato. This ACM currently poses no human health or environmental concerns. However, if the ACM is not managed in compliance with applicable local, state, and federal laws and regulations, it may become a hazard.

The transfer document will include a notice about the presence of ACM and the steps taken to reduce or eliminate ACM hazards. This notice will include the "Asbestos Management Plan, Hillside" (PWC 1996a), the "Asbestos Survey Report" (SSPORTS 1998a), the "Asbestos Remediation Completion Report for Non-residential Buildings" (SSPORTS 1998b), and the "Supplemental Asbestos Remediation Completion Report" (SSPORTS 1999a). The transferee will assume responsibility for the management of any remaining ACM in accordance with applicable local, state, and federal laws and regulations.

Restrictions. There are no restrictions on the property due to the presence of ACM.

8.2 LEAD-BASED PAINT

LBP hazards are defined in the Federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of P.L. 102-550), as codified in 42 USC Section 4822 (Act) as "any condition that causes exposure to lead ... that would result in adverse health effects." Lead exposure is especially harmful to young children and pregnant women. The Act provides for regulation of the abatement of lead hazards from LBP, lead-contaminated dust, and lead-contaminated soil for target housing only. The Act defines target housing as any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing for the elderly or persons with

disabilities) or any 0-bedroom dwelling. In addition, the seller and lessor must disclose known LBP or LBP hazards on residential housing built before 1978, per 40 CFR Part 745.

The Navy is required by the Act and subsequent DOD base realignment and closure guidelines (DOD 1994b) to survey and abate LBP hazards on target housing constructed before 1960. The DOD guidelines also stipulate that LBP surveys be conducted at target housing constructed between 1960 and 1978. No survey or abatement is required to be conducted at housing constructed after 1978. One of the exceptions to the DOD policy is that inspection and/or abatement of target housing is not required if the building is scheduled for demolition.

The EPA and DTSC disagree with the DOD guidelines on LBP hazards in soil. It is EPA's and DTSC's position that contamination of soil resulting from LBP constitutes a CERCLA release.

Residential-Use Buildings With Lead-Based Paint

Building 531 on Parcel 72 is currently used as a day care center and its intended reuse is the same after transfer. Navy policy treats this type of structure as residential for LBP evaluations and remediation. DTSC conducted sampling and analysis activities for lead in the soil at Building 531, Child Care Center, on Parcel 72 (DTSC 1997a). Lead was detected in soil at concentrations above action levels (846 ppm, DTSC 1997a). The Navy has completed removal of contaminated soil and abatement of the lead–based paints hazards on the structure (SSPORTS 1998d, SSPORTS 1998e). DTSC concurred that the actions for the soil removal is complete (DTSC 1998a).

Notifications. The notification for the transfer documents is the following:

This section serves as a notification that lead-based paint (LBP) may exist in non-residential buildings constructed before 1978 at DODHF Novato which are part of this FOST. Lead exposure is especially harmful to young children and pregnant women. The following notices are part of notification in the transfer document.

- A lead hazard information pamphlet in accordance with the Residential Lead-based Paint Hazard Reduction Act and 24 CFR Part 35.

- A notice, in accordance with 24 CFR 35.88, about the presence of LBP hazards including the removal summary report.

Restrictions. The restriction for the transfer documents is the following:

The recipient and its successor shall not permit the use, occupancy, demolition, renovation, or residential habitation of any structure unless the recipient and its successor(s) complies with all applicable federal, state, and local laws relating to LBP. Residential structures are defined as any house, apartment, or structure intended for human habitation, including but not limited to a non-dwelling facility commonly used by children under 6 years of age for extended periods of time such as a child care center, elementary school, or playground.

Non-Residential Lead-Based Paint

Under the Federal Residential Lead-Based Paint Hazard Reduction Act, federal facilities are subject to all federal, state, and local requirements. Currently, there are no federal, state, or local requirements for surveying and abating LBP in non-residential facilities. The Navy and DTSC conducted an evaluation of the potential for soil lead hazards at DODHF Novato in March through June of 1997. The results of the evaluations are included in the SEBS (PRC EMI and U&A 1997c) and DTSC reports (DTSC 1997a and b). The DTSC stated that the potential for contamination to soils from LBP exists for structures on parcels constructed before 1978. However, DTSC concurred with the Navy that the potential hazard from LBP in soil may be minimal (DTSC 1997a and 1997b). The DTSC conclusion was based on the review of the following characteristics which reduce or eliminate the potential for lead hazards in soil:

- Age of structure (post 1978)
- Condition of paint and paint chips on ground
- Planned demolition
- Structures of same architectural vintage as the Spanish Housing area (constructed in 1933-1934)
- Buildings with new siding and adequate debris clean-up
- Results of various sampling data

DTSC requested that parcels with LBP which meet one of the above criteria be classified as ECP area type 3 (release of hazardous substances at levels which do not require removal or remedial actions) provided that their planned reuse is implemented (DTSC 1997c). Additionally, DTSC

recommended that, upon completion of demolition, it should be confirmed that any residual levels of LBP in soils do not pose a threat to human health or the environment. Buildings to be demolished are listed on Table 5.

Building 203 on Parcel 104 was included in a survey for LBP conducted by PWC Norfolk. The results of soil sampling indicated lead in soil below the action level. The maximum concentration detected was 265 parts per million (PWC Norfolk 1996).

Building 1000 on Parcel 54 was previously planned to be demolished, however the latest information from the intended recipient is that the short term use of the building will be for storage and that the long term plan is to demolish the building (3 to 5 years). Upon visual inspection in 1998, the exterior paint on the building is in good condition with no visible paint chips on the ground (U&A 1998).

Notifications. The notification for the transfer documents is the following:

This section serves as a notification that lead-based paint (LBP) may exist in non-residential buildings constructed before 1978 at DODHF Novato which are part of this FOST. Lead exposure is especially harmful to young children and pregnant women.

Restrictions. The restriction for the transfer documents is the following:

The recipient and its successor shall not permit the use, occupancy, demolition, renovation, or residential habitation of any structure unless the recipient and its successor(s) complies with all applicable federal, state, and local laws relating to LBP. Residential structures are defined as any house, apartment, or structure intended for human habitation, including but not limited to a non-dwelling facility commonly used by children under 6 years of age for extended periods of time such as a child care center, elementary school, or playground.

8.3 RADON

A radon survey was conducted in the housing areas of DODHF Novato (areas not included in this FOST) in 1990 under the Navy Radon Assessment and Mitigation Program. A total of 86

stationary detectors were placed in selected buildings. The sampling results indicated that all concentrations of radon were below the EPA action level of 4 picocuries per liter (ERM-West 1995).

Notifications and Restrictions. No notifications or restrictions exist with respect to radon.

8.4 POLYCHLORINATED BIPHENYLS

A PCB survey of oil-filled electrical equipment (PWC San Francisco 1996) indicated that none of the parcels in this FOST contained PCB transformers (i.e., transformers containing greater than 500 parts per million [ppm] PCBs) nor PCB-contaminated transformers (i.e., transformers containing greater than 50 ppm PCBs, but less than 500 ppm). A follow-up survey by SSPORTS (SSPORTS 1998c) identified several additional pieces of electrical equipment with detected concentrations of PCBs on parcels included in this FOST. Electrical equipment which is out of service and contains detected concentrations of PCBs has been removed by the Navy (SSPORTS 1998c). During the Basewide EBS, no staining was observed on pads or in soils beneath any transformers on parcels covered by this FOST (ERM West 1995). During the follow-up survey, several pieces of electrical equipment were noted to have "seepage." This seepage was described as discoloration on the exterior of the equipment in question, not as release to concrete pads or soil, and therefore presents no adverse environmental impact. There is no electrical equipment with detected concentrations of PCBs or seepage remaining on parcels part of this FOST (SSPORTS 1998c).

Notifications and Restrictions. No notifications or restrictions with respect to PCB concentrations in electrical equipment.

8.5 PESTICIDE USAGE

There is no evidence to suggest that pesticides and herbicides, other than those ordinarily and routinely applied in a manner consistent with the standards for licensed application, were ever used at DODHF Novato.

8.5.1 Pesticides Used

A review of Pest Management Plans from PWC San Francisco (PWC San Francisco 1987 through 1995) indicates the following were typical of herbicides and pesticides that were used at DODHF Novato. Herbicides which may have been used at DODHF Novato include the following:

- XL 2G
- Team 2G
- Surflan A.S.
- Ronstar 50 WP
- Roundup
- Ronstar G

Insecticides, termiticides, and rodenticides which may have been used at DODHF include the following:

- Dursban TC
- PT-515 (Wasp Freeze)
- Vaponite 2E
- Dursban 2E
- Dursban 4E
- Dursban-TC
- Drione
- Ficam W
- Diazinon 4E
- Sevin 80W
- Anti-coagulant Bait Blocks

8.5.2 Pesticide Management

Pesticides, insecticides, termiticides, and rodenticides were applied intermittently on an as-needed basis at DODHF Novato either by personnel from the PWC Pest Control Department or by contractor personnel. All personnel who routinely applied pest control substances were trained and licensed in the proper and legal application of pesticides, including the insecticides, termiticides, and rodenticides listed above. Pesticides were applied per the manufacturer's directions, in accordance with the state and federal EPA registered pesticide label directions, and in accordance with the installation's annually approved pest management plan. Because the pesticides and herbicides were routinely applied in a manner consistent with the standards for licensed application, they likely do not pose a threat to human health or the environment. In

addition, there is no indication that reportable quantities of pesticides were stored at DODHF Novato.

Notifications and Restrictions. No notifications or restrictions due to pesticide or herbicide usage are required.

9.0 SUMMARY OF NOTIFICATIONS AND RESTRICTIONS

9.1 NOTIFICATIONS

The notifications contained in this section are based upon findings summarized in Section 5.3 and Sections 8.1 through 8.5.

Parcel 2A

The following are notifications with respect to the ongoing investigation activities adjacent to Parcel 2A:

- Property adjacent to this parcel is undergoing an investigation of hazardous substance release.
- The Navy and applicable regulatory agencies will be allowed unrestricted access to enter the property to conduct investigations, surveys, collect samples, perform remediation, access monitoring wells, or engage in other activities associated with environmental concerns the site (i.e. the potential for migration from the adjacent Parcels 2B and 4).

Asbestos

Upon the completion of the asbestos abatement project and prior to transfer, this section serves as a notification that ACM exists in buildings on Parcels 8, 12, 54, 72, and 104 at DODHF Novato. This ACM currently poses no human health or environmental concerns. However, if the ACM is not managed in compliance with applicable local, state, and federal laws and regulations, it may become a hazard.

The transfer document will include a notice about the presence of ACM and the steps taken to reduce or eliminate ACM hazards. This notice will include the "Asbestos Management Plan, Hillside" (PWC 1996a), the "Asbestos Survey Report" (SSPORTS 1998a), the "Asbestos Remediation Completion Report for Non-residential Buildings" (SSPORTS 1998b), and the "Supplemental Asbestos Remediation Completion Report", (SSPORTS 1999a). The transferee will assume responsibility for the management of any remaining ACM in accordance with applicable local, state, and federal laws and regulations.

Residential-Use Building With Lead-Based Paint

This section serves as a notification that lead-based paint (LBP) may exist in non-residential buildings constructed before 1978 at DODHF Novato which are part of this FOST. Lead exposure is especially harmful to young children and pregnant women. The following notices are enclosed and are made a part of the notification:

- A lead hazard information pamphlet in accordance with the Residential Lead-based Paint Hazard Reduction Act and 24 CFR Part 35.
- A notice, in accordance with 24 CFR 35.88, about the presence of LBP hazards including the removal summary report.

Non-Residential Lead-Based Paint

This section serves as a notification that lead-based paint (LBP) may exist in non-residential buildings constructed before 1978 at DODHF Novato which are part of this FOST. Lead exposure is especially harmful to young children and pregnant women.

9.2 RESTRICTIONS

The restrictions contained in this section are based upon findings summarized in Section 5 and the disclosures discussed in Sections 8.1 through 8.5. In lieu of a deed restriction, the Navy will enforce restrictions by a legally binding agreement between the buyer and the seller which survives the closing. This may be in the contract for sale, Economic Development Conveyance agreement or similar document.

Lead-Based Paint

The recipient and its successor shall not permit the use, occupancy, demolition, renovation, or residential habitation of any structure unless the recipient and its successor complies with all applicable federal, state, and local laws relating to LBP. Residential structures are defined as any house, apartment, or structure intended for human habitation, including but not limited to a non-dwelling facility commonly used by children under 6 years of age for extended periods of time such as a child care center, elementary school, or playground.

10.0 REQUIRED ENVIRONMENTAL COVENANTS

The 9 parcels at DODHF Novato deemed suitable to transfer in this document will be transferred in accordance with federal real property disposal laws. The notice of hazardous substances as required by CERCLA Section 120(h)(3) is not required for these parcels. The deed will contain the deed covenant required by Sections 120(h)(3) and 120(h)(4) of CERCLA. The deed for conveyance of this property will contain the following:

For parcels with ECP Type Category 3, parcels 12, 54 and 104, ECP Type Category 4, parcels 8, 64 and 72, the following applies:

Under 42 U.S.C. §9602(h)(3), with respect to any portion of the Real Estate on which any hazardous substance was stored for one year or more, known to have been released, or disposed of:

(A) Grantor covenants that all remedial action necessary to protect human health and the the environment with respect to any such substance remaining on the Property has been taken before the date of transfer to Grantee; and

(B) Any additional remedial action found to be necessary after the date of such transfer shall be conducted by the Grantor; and

(C) Grantee covenants that Grantor shall have access to the Property in any case in which remedial or corrective action is found to be necessary after the date of such transfer.

For parcel with ECP Type Category 2, parcels 2A and 55A, the following applies:

With respect to any portion of the Real Estate where only release or disposal of petroleum has occurred:

Grantee covenants that Grantor shall have access to the Property in any case in which remedial action or corrective action is found to be necessary after the date of such transfer.

For parcel with ECP Type Category 1, parcel 9, the following applies:

Under 42 U.S.C.S. §9620(h)(4)(D), with respect to any portion of the Real Estate where no hazardous substances and no petroleum products or their derivatives were known to have been released or disposed of :

(A) Grantor covenants that any response action or corrective action found to be necessary after the date of transfer of the Property shall be conducted by the Grantor; and

(B) Grantee covenants that the Grantor shall have access to the Property in any case in in which a response action or corrective action is found to be necessary after the date of the conveyance of the Property or shall have access where necessary to carry out a response action or corrective action on adjoining property.

11.0 FINDING OF SUITABILITY TO TRANSFER

The transfer proposal has been adequately assessed and evaluated for (1) environmental hazards, and (2) environmental impacts anticipated from future use of the property. The reuse, as outlined in the Reuse Plan (Bein 1995), of the designated parcels at DODHF Novato does not present a current or future risk to human health or the environment. Based on the foregoing information and analysis, the property covered by this FOST is suitable for transfer.

GREGORY J.BUCHANAN
CAPTAIN, CEC, USN
Commanding Officer
Engineering Field Activity West
Naval Facilities Engineering Command

2/18/00
Date