

FINDING OF SUITABILITY TO LEASE  
(FOSL)

SENECA ARMY DEPOT ACTIVITY, NEW YORK  
NORTH DEPOT AREA  
January 1998

**1. PURPOSE**

The purpose of this Finding Of Suitability To Lease (FOSL) is to document the environmental suitability of the North Depot Area, at Seneca Army Depot Activity (SEDA), New York for lease to the Seneca County Industrial Development Agency (IDA), for sublease to Youth Services International (YSI) for use as a academy for troubled youths for a 5 year period or other uses consistent with the SEDA Reuse Plan, consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120 (h)(3)(B) and Department of Defense policy. In addition, the FOSL identifies any restrictions as specified in the attached Environmental Protection Provisions necessary to protect human health and the environment and to prevent interference with any on-going or planned remediation activities.

**2. PROPERTY DESCRIPTIONS**

The proposed property to be offered for lease, is identified in the Environmental Baseline Survey (EBS) as the North Depot Area and consist of 165.88 acres of land, which includes 42 buildings and/or structures and a number of other land improvement items. A listing of the 42 buildings and/or structures are attached as enclosure 1 page 4, Building and Structure List. A listing of the land improvement items are attached as enclosure 1 page 5, Land Improvement List. Site maps of the proposed property for lease are attached as enclosure 1 page 1, SEDA Installation Map, enclosure 1 page 2, North Depot Area and enclosure 1 page 3 CERFA Map BRAC Parcel Designation North Depot Area.

**3. ENVIRONMENTAL CONDITION OF THE PROPERTY**

A determination of the environmental condition of the facilities and property has been made based on the Community Environmental Response Facilitation Act (CERFA) Report, dated March 22, 1996 and as amended on December 6, 1996, and an Environmental Baseline Survey (EBS), dated March 22, 1996, and as revised on October 30, 1996. The information provided is a result of a complete search of agency files during the development of the CERFA Report and the EBS. The following documents also provided information on environmental conditions of the property: SEDA's Asbestos Management Plan, SEDA's radon survey, SEDA's radiation surveys, SEDA's Bulk Petroleum Storage registration, and New York State Department of Environmental Conservation (NYSDEC) Region 8 spill list.

**3.1 Environmental Conditions of Property Categories**

The property that is being considered for lease is classified as Department of Defense (DOD) Environmental Condition of Property (ECP), as established in the DOD 1997 Appropriations Act, Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred. Category 2 : Areas where only release or disposal of petroleum products has occurred. Category 6 : Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented. Category 7 : Areas that are not evaluated or require additional evaluation. The ECP Categories for the specific buildings and/or parcels is as follows:

ECP Category 1: Five parcels identified as BRAC parcels number 33(1)PS, 35(1)PS, 36(1)PS, 39(1)PS, and 40(1)PS.

ECP Category 2: Seven parcels identified as BRAC parcels number 34(2)PS, 37(2)PS, 38(2)PS, 47(2)PS/PR/HS, 102(2)PS/PR(P), 134(2)PS/PR, and 136(2)PR.

ECP Category 6: Two parcel identified as BRAC parcels number 101(6)PS/PR/HS/HR and 125(6)Q-X.

ECP Category 7: Four parcels identified as BRAC parcels number 100(7)PS/PR/HS/HR, 113(7), 139(7), and 140(7)

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

Parcels which require use restrictions are described in the Environmental Protection Provisions (Enclosure 4 page 5 ).

### **3.2 Storage, Release , or Disposal of Hazardous Substances**

It was determined that there is no evidence that hazardous substances were stored at the properties listed in the FOSL in excess of reportable quantities listed in 40 CFR Part 373. According, there is no need for a notification of hazardous substance storage.

Hazardous substances were released in excess of 40 CFR PART 373 reportable quantities in the following building: Building 718 , the release of this hazardous substances was remediated at the time of release.

A summary of the buildings or areas in which hazardous substances were stored , released, or disposed of in excess of 40 CFR Part 373 reportable quantities is provided in Table 2 - Notification of Hazardous Substance and Petroleum Products Storage, Release or disposal (Enclosure 3 page 1).

### **3.3 Petroleum and Petroleum Products**

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

It was determined that there is no evidence that petroleum, petroleum products were stored, with the exception of underground (UST)and aboveground (AST) petroleum storage tanks. It was determined that there is no evidence of disposal of petroleum products at the properties listed in the FOSL. Petroleum products were released at building 718 and 721. The release of these petroleum products were remediated at the time of the release. A summary of the buildings or areas in which petroleum or petroleum products were stored, released, or disposed of is provided in Table 2 - Notification of Hazardous Substance and Petroleum Products Storage, Release or Disposal (Enclosure 3 page 1).

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

The EBS and visual site inspections (VSI) reported or identified seven aboveground and sixteen underground tanks on the Property, which were used for storage of petroleum and petroleum products.

There is no evidence of petroleum contamination at the following sites: Building 701, 715, 717, 748, 749, 750, and 751.

The heating oil UST's located at buildings 714, 729, 733, 740, and 742 have been removed in accordance with state law. At the time of their removal it was determined that there was no evidence of petroleum contamination.

The diesel fuel UST located at building 721 has been removed in accordance with state laws. At the time of its removal it was determined that there was no evidence of petroleum contamination. Building 746, in addition to the heating oil UST which was removed this building also contains a oil/water separator system which includes a 50 gallon UST for overflow and a 25 gallon UST as part of a battery room spill containment system. There is no evidence of contamination at these two sites.

There was petroleum contamination at the following UST/AST sites:

It was determined that heating oil leaked from the UST's located at Buildings 710 and 752. These UST's were closed and replaced with UST for 710 and a AST for 752. The petroleum product contamination was subsequently remediated in accordance with applicable state law.

It was determined that heating oil was spilled at the UST's located at buildings 718 and 746, 747. These spills were subsequently remediated in accordance with applicable state law.

It was determined that gasoline leaked from the UST's located at buildings 719 and 742. The UST's (3) at building 742 were closed and replaced with (2) UST's. The UST at building 719 was closed and not replaced. The gasoline contamination was/is subsequently being remediated in accordance with state law. The heating oil UST's located at buildings 746 and 747 have been removed in accordance with state law. At the time of their removal it was determined that there was minor ground water contamination and based on guidance from NYSDEC Region 8 Division of Spill Management a ground water monitoring well was installed at each of the removal sites to determine any environmental impacts to the area around the tank removal sites.

The used oil UST located at building 732 has been removed in accordance with state law. At the time of its removal it was determined that there was minor ground water contamination and based on guidance from NYSDEC Region 8 Division of Spill Management a ground water monitoring well was installed at the removal site to determine any environmental impacts to the area around the tank removal site.

A summary of the AST/UST sites where petroleum products were stored, released, or disposed is provided in Table 2 - Notification of Hazardous Substance and Petroleum Products Storage, Release or Disposal (Enclosure 3 pages 1 and 2).

### **3.4 Polychlorinated Biphenyl (PCB) Equipment**

A contract has been written and awarded to do a survey of all transformers and electrical equipment which may contain PCB's. Survey is scheduled for completion by Feb. 15, 1998. Until such time all transformers will be considered as PCB.

### **3.5 Asbestos**

The asbestos reinspection surveys, conducted on Oct. 2nd, 3rd, 4th, and 7th, of 1996, and on Feb. 4th, 5th, 6th, 7th, Mar. 4th, and 5th, of 1997 indicate asbestos containing materials (ACM) are present in the following buildings 701 floor tile, 705 floor tile, 707 floor tile, 710 floor tile, 715 transit wall board, 720 pipe insulation, 724 floor tile, 729 pipe insulation, 740 floor tile and transit wall board, and 742 floor tile. Buildings 703, 704, 708, and 723 have not been reinspected, the asbestos survey conducted in 1988 indicated that they contained ACM pipe insulation and floor tile. Abatement projects to remove asbestos pipe insulation were performed on these buildings, however inaccessible areas were not abated.

The ACM identified in the reinspected buildings does not currently pose a threat to human health or the environment because any identified friable asbestos that poses an unacceptable risk to human health has either been removed or encapsulated. The lease will include the asbestos warning and covenant in the Environmental Protection Provisions (Enclosure 4 page 5).

### **3.6 Lead Based Paint (LBP)**

Based on the age of the buildings (constructed prior to 1978), LBP is presumed to be present in all of the buildings proposed for lease, with the exception of Buildings 711, 734, 746, 747, 748, 749, 750, 751, 752, 753 and 754 which were built after 1978. The lease will include the lead-based paint warning and covenant included in the Environmental Protection Provisions (Enclosure 4 page 4).

### **3.7 Radiological Sources or Contamination**

The Army used and/or stored night vision equipment which contained H3 tritium, compasses and watches which contained RA226 radium, and ordnance trainers which contained depleted uranium U238 in the following buildings on the property: Building 703 rooms 112, 113A, and 113B, H3 tritium and RA226 radium. Building 720 rooms 201 and 202, H3 tritium and RA226 radium. Building 747 maintenance bay, depleted uranium U238. There is no evidence that any of these sources were ever damaged or ruptured. A field survey was conducted at the buildings in the areas/rooms where these sealed sources had been utilized and/or stored. The surveys were completed November, December of 1994, and December of 1997, the surveys indicated the areas were suitable for unrestricted use.

### **3.8 Radon**

Radon surveys were conducted in buildings, proposed for lease. These surveys were conducted under Army Regulation 200-1, Chapter 11 Army Radon Reduction Program which required that all priority 1, (Day care, hospitals, schools, and living areas) priority 2, (Areas having 24 hour operations) and priority 3, (All other routinely occupied structures) be surveyed. Based on this requirement the following building/structures were not surveyed 716, 717, 719, 721, 725, 727, 728, 730, 733, 741, 748, 749, 754, and 755 as they did not meet the priority 1, 2, and 3 requirement. The results of the survey performed on the remaining buildings indicated that radon was not detected at above the EPA residential action level of 4 picocuries per liter (pCi/l) in any of these buildings except building 703 which showed one out of five test areas to be over 4.0 pCi/L. A retest was then conducted to confirm the results and the results of the retest were all under 1.0 pCi/L. The radon detection device used for these surveys were Alpha Track Monitor, a cylindrical container with a small piece of plastic sensitive to the alpha radiation released by radon and radon decay products.

### **3.9 Unexploded Ordnance**

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

### **3.10 Other Hazardous Conditions (Adjoining property)**

Army owned adjacent property which exists on three sides, the East, West and South, portions of the proposed lease property, have been determined to contain several areas where storage, release, disposal or migration of hazardous substances or petroleum products has occurred, but required removal or remedial actions have not yet been initiated. These areas are being or are planned to be investigated. Based on actual or suspect contamination these areas do not pose a threat to the area proposed for lease under this FOSL. These areas are in a secure area and are separated from the proposed leased property by a minimum of a 7 foot high chain link fence topped with barbed wire. A summary of the Army owned adjacent property areas in which storage, release, disposal or migration of hazardous substances or petroleum products has occurred is provided in Table 1A - Army Owned Adjacent Property - Environmental Conditions (Enclosure 2 page 2).

Privately owned farm land to the North of the proposed lease property is considered to not pose a human health or environmental threat.

#### **4. REMEDIATION**

On July 14, 1989, the EPA placed Seneca Army Depot Activity on the National Priority List (NPL) for environmental restoration. SEDA has since entered into a Federal Facilities Agreement (FFA) dated January 23, 1993, with the NYSDEC and the EPA. Any parcel identified for future remediation will be restricted accordingly.

#### **5. REGULATORY COORDINATION**

The NYSDEC Central Office, the NYSDEC Region 8 office and the EPA Region 2 were notified of the initiation of the FOSL. Regulatory comments (Enclosure 5) received during the FOSL development were reviewed and incorporated as appropriate.

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

The environmental impacts associated with leasing the subject area have been adequately analyzed in accordance with NEPA. The results of this analysis have been documented in the Record of Environmental Consideration dated January 13, 1998. The environmental effects of the activities anticipated under the proposed lease were determined to have appropriate categorical exclusion A21 which is defined as "Grants of leases, licenses, and permits to use existing Army controlled property for non-Army activities, provided there is an existing land use plan that has been environmentally assessed and the activity will be consistent with that plan."

The proposed lease of the property to the Seneca County IDA for sublease to YSI for use as a academy for troubled youths addressed by this FOSL is consistent with the reuse alternatives stated in the above referenced NEPA document and with the intended reuse of the property set forth in the Reuse Plan.

#### **7. ENVIRONMENTAL PROTECTION PROVISIONS**

On the basis of the above results from the site-specific EBS, any subsequent or additional investigations, surveys, or studies identified in the FOSL, and in consideration of the intended use of the property, certain terms, conditions, reservations, and restrictions are required for the proposed lease of the property. The Environmental Protection Provisions are at enclosure 4 and will be included in the lease.

#### **8. FINDING OF SUITABILITY TO LEASE**

Based on the information detailed in the EBS, the references cited therein, and this FINDING OF SUITABILITY TO LEASE, I have concluded that all Department of Defense requirements to reach a FINDING OF SUITABILITY TO LEASE have been fully met for the subject properties. The subject property is suitable to lease by the Lessee for the intended purpose, subject to the terms, conditions, reservations, and restrictions set forth in the Environmental Protection Provision attached to this FOSL, without posing an unreasonable risk to human health and the environment and without interference with the environmental remediation process at Seneca Army Depot Activity, and the uses contemplated for the lease and sublease are consistent with protection of human health and the environment.

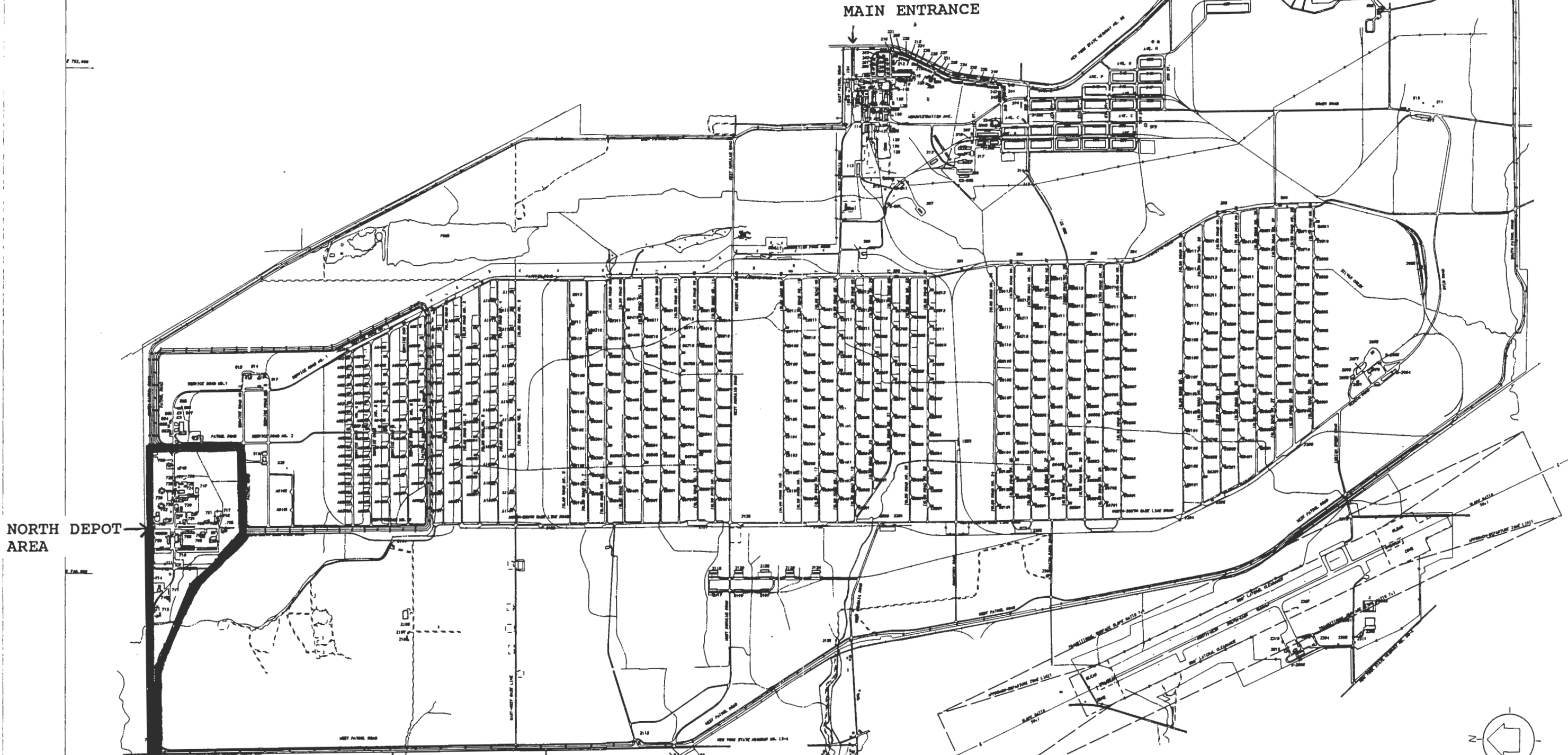
As required by CERCLA section 120(h)(3)(B), I have determined that the Environmental Protection Provisions of the lease and the terms of the lease provide adequate assurances that the United States will take any additional remedial action found to be necessary to protect human health and the environment with respect to any hazardous substances remaining on the property on the date of the lease which has not been taken on the date of the lease.

Notification of hazardous substance or petroleum product storage , release, treatment, or disposal on the property, enclosure 3, Table 2 Notification of Hazardous substance or Petroleum Product Storage, Release, Treatment or Disposal shall be provided in the lease documents, as required under DoD FOSL Guidance.

EARLE C. RICHARDSON  
Colonel, GA  
Deputy Chief of Staff for  
Engineering, Housing, Environment and Installation  
Logistics

**Six Enclosures**

- Encl. 1 Site Maps of Proposed lease Area, List of buildings, structures and land improvements.
- Encl. 2 Table 1 Description of Property and Environmental Condition
  - Table 1A Army Owned Adjacent Property - Environmental Condition
- Encl. 3 Table 2 Notification of Hazardous Substance or Petroleum Product Storage, Release, Treatment or Disposal
- Encl. 4 Environmental Protection Provisions
- Encl. 5 Regulatory Comments
- Encl. 6 Site Maps of Restricted Parcels

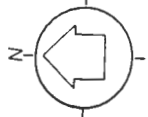
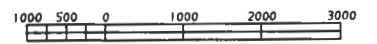


NORTH DEPOT AREA

MAIN ENTRANCE

LEGEND

- |          |                          |          |  |
|----------|--------------------------|----------|--|
| 2-2-2    | BUILDING, PERMANENT      | 2-2-2    | IMPERVIOUS EYE CONTAINMENT                         |
| 2-2-2-1  | BUILDING, SEMI-PERMANENT | 2-2-2-1  | DEPRESSION   |
| 1-2-2-2  | BUILDING, TEMPORARY      | 2-2-2-2  | FLOOD OUTLINE (100 YEARS)                          |
| 2-2-2-3  | BUILDING, UNDERGROUND    | 2-2-2-3  | MOSE CONTAINMENT                                   |
| 2-2-2-4  | ROAD AND PARKING         | 2-2-2-4  | ES&D   |
| 2-2-2-5  | TRAIL OR EARTH ROAD      | 2-2-2-5  | EXPLOSIVE SAFETY BARRIERS-DISTANCE                 |
| 2-2-2-6  | RAILROAD                 | 2-2-2-6  | FRAGILITY DISTANCE                                 |
| 2-2-2-7  | FENCE                    | 2-2-2-7  | AIRFIELD/HELIPAD SAFETY ZONE                       |
| 2-2-2-8  | ASSIGNMENT BOUNDARY      | 2-2-2-8  | HISTORICAL BUILDING OR PLACE / ARCHAEOLOGICAL SITE |
| 2-2-2-9  | RIGHT-OF-WAY OR EASEMENT | 2-2-2-9  | UNSATURATED SOILS                                  |
| 2-2-2-10 | DRAINAGE DITCH           | 2-2-2-10 | SENSITIVE NATURAL AREAS                            |
|          |                          | 2-2-2-11 | HAZARDOUS SURFACE DANGER ZONE                      |

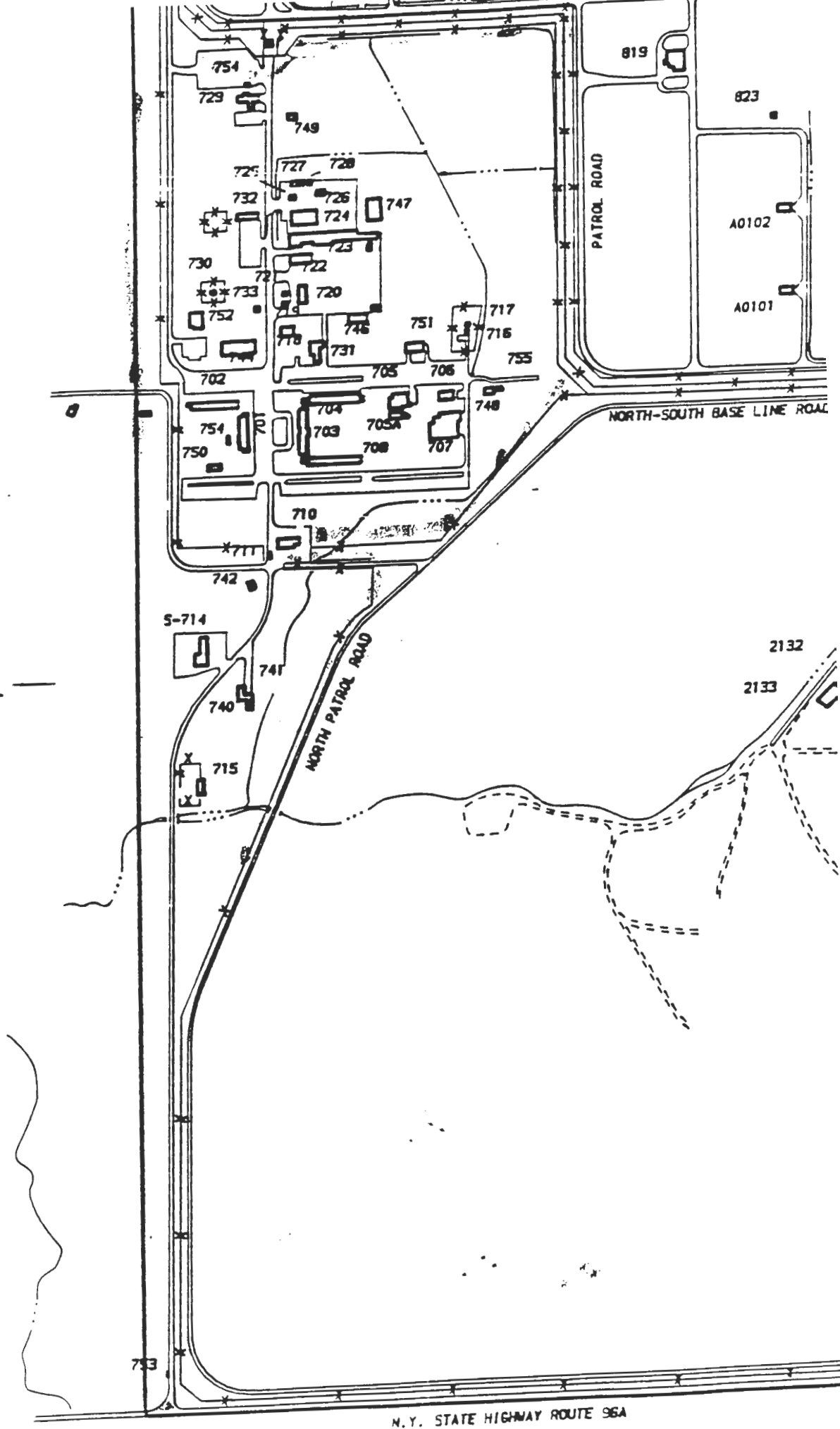


Enclosure 1 page 1

REV. NO.	DATE	DESCRIPTION	(INI)
		STYLYON ASSOCIATES, INC. ARCHITECTS - ENGINEERS BALTIMORE, MARYLAND	
		J.S. ARMY ENGINEER DISTRICT, NEW CORPS OF ENGINEERS NEW YORK, NEW YORK	
<p>SENECA ARMY DEPOT ROMULUS, NEW YORK</p> <p>INSTALLATION MAP</p> <p>EXISTING CONDITIONS</p> <p>I-70SM</p>			

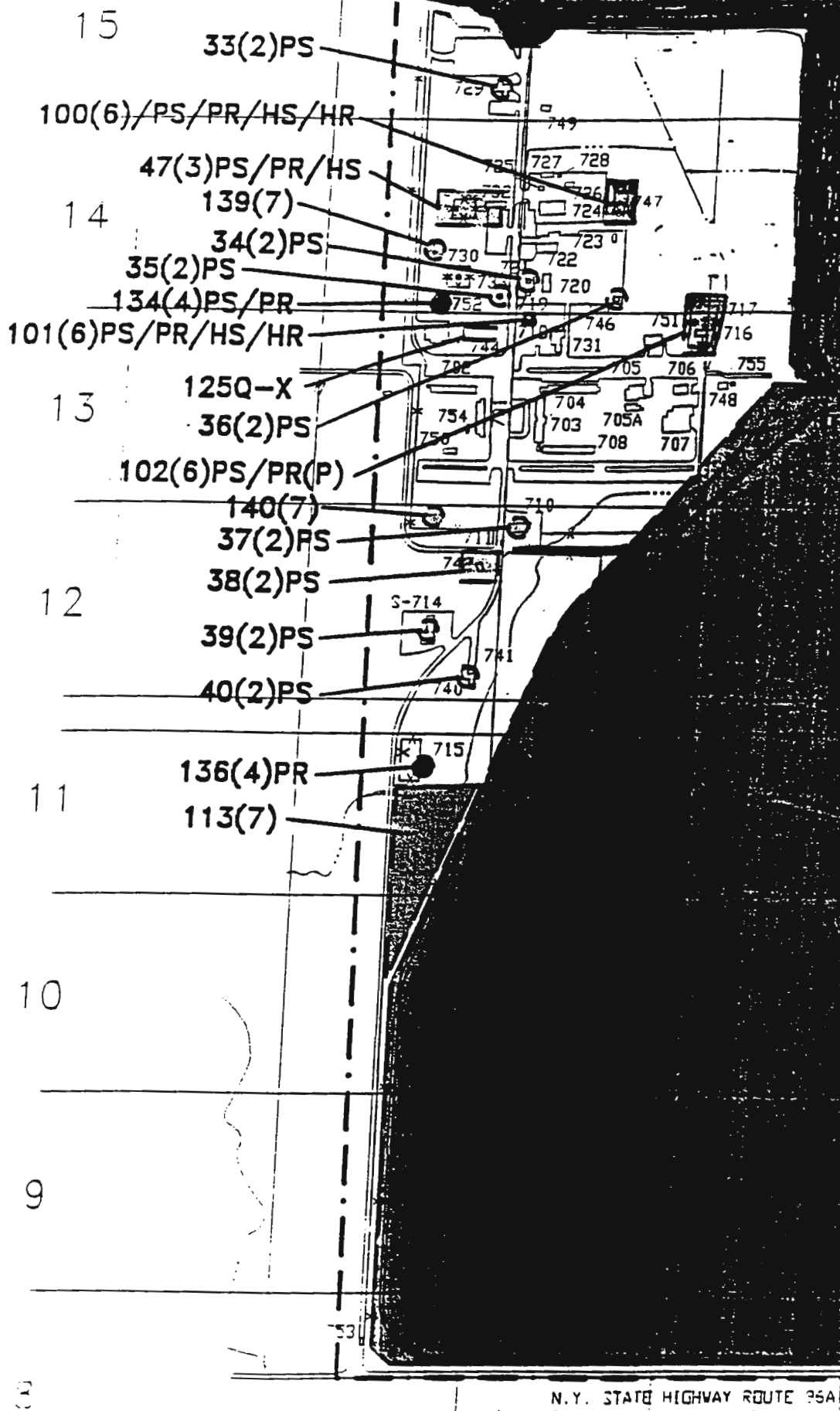
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N.Y. STATE HIGHWAY ROUTE 96A





N.Y. STATE HIGHWAY ROUTE 95A

**BUILDING AND STRUCTURE LIST**

<b>SENECA ARMY DEPOT ACTIVITY</b>				<b>16-Dec-95</b>	
<b>FACILITY NO.</b>	<b>FAC CAT. CODE</b>	<b>TYPE</b>	<b>USE</b>	<b>SQ. FOOT</b>	<b>BLD. MAT</b>
701	61050	ADM	Office	14,280	block
702	72410	UOD/ADM	Office & Barracks	18,278	concrete
703	72111	ENL/UPH	Barracks	40,572	block
704	72111	ENL/UPH	Barracks	31,112	block
705	74068	REC/SKIL	Recreation	11,893	block
706	74010	AUDITOR	Theatre	3,705	block
707	72210	DINE/PX	Dinning & Store	18,924	block
708	72111	ENL/UPH	Barracks & Office	31,112	block
710	61050	ADMIN	Security Office	3,280	block
711	14113	ACC CON	Sentry Station	86	block
714	74011	BOWL	Bowling Center	7,633	wood
715	89131	SEW/WA	Sewage Treatment	4,792	block
716	14165	FUEL	Fuel Truck Load Fac.	144	block
718	89121	HEAT	Heat Plant	3,224	block
719	61050	ADMIN	Breakroom	374	block
720	61050	ADMIN	Offices	4,282	block
721	74055	EXCH/WH	Pump House	177	block
722	73010	FIRE STA	Fire Station	4,700	block
723	74021	COMMISS	Store	23,176	block
724	74022	SKIL DEV	Offices	9,000	block
725	21710	EL MAINT	Maintenance	177	block
726	44220	GP STOR	Storage	967	steel
727	44220	GP STOR	Storage	1,320	steel
728	44220	GP STOR	Storage	177	block
729	61050	ADMIN	Security Office	4,620	block
731	74047	ENL DINE	Restaurant	6,874	block
732	74024	AUTO SK	Auto Maint. Garage	3,584	steel
733	74013	CANTEEN	Bath House /Pool	530	block
734	44220	PWR PLT	Generator Building	138	block
740	73017	CHAPEL	Chapel	4,498	block
742	74052	AUTO/EX	Gas Station	1,392	block
744	74028	PHY FIT	Gymnasium	18,079	block
746	21885	GP MAIN	Auto Maint. Garage	4,239	block
747	17132	GEN REP	Training Facility	8,700	block
748	73075	TOIL/SHO	Camping Latrine	13,675	block
749	87240	WORK ANIMAL	Dog Kennel	1,050	block
750	74033	ACS CTR	Office	2,407	block
751	74065	REC EQ	Storage	5,013	steel
752	74014	CHLD DEV	Child Care Center	6,596	block
753	14113	ACS CNT	Sentry Station	35	block
754	89111	PWR PLT	Generator Building	138	block
755	44220	STOR GP	Storage	900	steel
			<b>TOTAL</b>	<b>315,853</b>	



<b>Table 1 Description of Property and Environmental Condition</b>			
<b>BRAC Parcel Number</b>	<b>Location (X,Y) Coordinates</b>	<b>ECP Category</b>	<b>Description, Basis for ECP, and Remedial action.</b>
33(1)PS	2, 15	1	Bldg. 729- fuel storage -No remediation required.
34(2)PS	3, 14	2	Bldg. 719- gasoline dispensing/storage dispensing piping leaking, 721- diesel fuel dispensing and storage, and 720 - fuel oil storage and vehicle maintenance- Bldg. 719 remediation of soil required.
35(1)PS	2, 14	1	Bldg. 733- fuel oil storage - No remediation required.
36(1)PS	3, 14	1	Bldg. 746- fuel oil storage - No remediation required.
37(2)PS/PR	3, 12	2	Bldg. 710- fuel oil storage reported leaking 1989 - Tank was replaced and soil was remediated. No further remediation required.
38(2)PS	2, 12	2	Bldg. 742- gasoline dispensing/storage reported leaking 1987. Tanks were removed and spill was closed out by NYSDEC 1988. No further remediation required.
39(1)PS	2, 12	1	Bldg. 714- fuel oil storage - No remediation required.
40(1)PS	2, 12	1	Bldg. 740- fuel oil storage - No remediation required.
47(2)PS/PR/HS	2, 14	2	Bldg. 732- (SWMU No. SEAD-29) auto hobby shop, waste oil storage - Waste oil tank was removed 11-17-97.
100(7)PS/PR/HS/HR	3, 14	7	Bldg. 747- unknown contents/unknown storage: spill reported 1992 - Spill was closed out.
101(6)PS/PR/HS/HR	3, 13	6	Bldg. 718-(SWMU No. SEAD-32 waste oil storage, SEAD-61 waste oil burning boilers, SEAD-35, boiler blow down leach pit, SEAD- 41) spill reported in bldg. 718 in 1994 - Spill was closed out-
102(2)PS/PR(P)	3, 13	2	Bldg. 716-717- fuel oil storage/distribution. No remediation required.
113(7)	2, 11	7	Mounds and a rusty drum. To be investigated.
125(6)Q-X		6	Bldg. 744 indoor range. Lead in the form of bullet fragments is present in the bullet collection area behind the bullet backstop.
134(2)PS/PR	2, 14	2	Bldg. 752- fuel oil UST reported leaking in 1990 - Tank was replaced with AST spill was closed out. No further remediation required.
136(2)PR	2, 11	2	Bldg. 715- fuel oil release from Bldg. 718 contained in secondary sewage treatment facility - Spill was closed out. No further remediation required.
139(7)	2, 14	7	Rumored DDT cans disposal area. To be investigated.
140(7)	2, 12	7	Rumored drum disposal area. To be investigated.

<b>Table 1A Army Owned Adjacent Property - Environmental Condition</b>			
<b>BRAC Parcel Number</b>	<b>Location (X,Y) Coordinates</b>	<b>ECP Category</b>	<b>Description, Basis for ECP, and Remedial action.</b>
32(1)	2, 12	1	UST - Bldg. 800 Tank was closed in place 11-18-97. No further remediation required.
53(5)HR	3, 17	5	Radioactive waste burial (SEAD-12A). Pending.
98(6)PS/PR HS/HR	4, 17	6	Bldg. 813 - 817 - paints, boiler pits, petroleum release, tritium release, unknown burial activities. Radioactive waste burial north of bldg. 804 and 805 (SEAD-12B), mixed waste storage at Bldg. 803 (SEAD 72), incinerator and bldg. 810 (SEAD-19), USTs at Bldg. 802 and 805. Leaking tank at bldg. 806 reported in 1989: leaking tank at Bldg. 807 reported in 1991. Unknown contents/unknown storage at bldg. 810. Unknown activities/storage at bldg. 819, igloos a0101 and A0102.
99(2)PS/ HS/HR	3, 15	2	Former MP gas station (removed tank)
103(6)HR	5, 13	6	Misc., components burial area (SEAD-63)
104(6)PR/ HS/HR	5, 9	6	Open burning (SEAD-23), open detonation (SEAD-45), explosive ordnance disposal (SEAD-57), filled area at bldg. T-2110 (SEAD-70), training area, spills reported at Open Burning and Open Detonation Grounds in 1994: spill reported at bldg. 2134 in 1995
123Q-RD	4, 17	6	Special Weapons Area (SEAD-12B). Radionuclides
124Q-RD	3, 17	6	Special Weapons Area (SEAD-12A). Radionuclides
126Q-RD	5, 13	6	Special Weapons Area (SEAD-63). Radionuclides.
127Q-X	5, 9	6	Open Burn/Open Detonation grounds. Unexploded ordnance and/or fragments

Parcel label definitions:

PS = petroleum storage  
PR = petroleum release  
HS = hazardous substance storage  
HR = hazardous substance release  
Q = qualified non - CERCLA issue  
RD = radionuclides  
X = UXO and/or ordnance fragments

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

Building and/or area	BRAC Parcel number	Size (acres)	Hazardous substance	Storage	Release and/or disposal	remediation and/or mitigation
715	136(2)PR	0.10	#6 fuel oil	N/A	3,000 gallons	Cleaned up/closed out 4-19-90
721	N/A	0.10	diesel fuel	N/A	10 gallons	Cleaned up/closed out 6-16-97
718	101(6)PS/PR/HS/HR	0.08	mercury	N/A	3 ounces	Cleaned up/closed out 2-17-94

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

Building	Parcel Number	Size of tank Gallon	UST/AST	Product stored	Release amount gallons date	Remediation/ present status
701	N/A	500	UST	diesel	none	Empty, out of service.
710	37(2)PS/PR	1,000	UST	#2 heating oil	UNK 1989	UST was replaced with UST. Empty out of service.
714	39(1)PS	1,000	UST	#2 heating oil	None	Tank was removed and not replaced 3-27-97
715	136(2)PR	275	AST	diesel	None	Out of service
717	102(2)PS/PR (P)	40,600	AST	#2 heating oil	None	Empty, out of service
718	101(6)PS/PR /HS/HR	10,000	UST	Used oil	None	Empty, out of service
718	101(6)PS/PR /HS/HR	40,000	UST	#6 heating oil	UNK 1988	Spilled material cleaned up. Spill was closed out by NYSDEC. Out of service.
718		20,000	UST	#6 heating oil	None	Out of service
719	34(2)PS	15,000	UST	gasoline	50 - 1997	Tank was removed and not replaced. Contaminated soil removed. Site will be closed out pending NYSDEC approval.
721	34(2)PS	12,000	UST	diesel	None	Tank was removed and not replaced 8-13-97
729	N/A	500	UST	diesel	None	Active
729	33(1)PS	2,000	UST	#2 heating oil	None	Tank was removed and not replaced 11-17-97.
732	47(2)PS/PR	500	UST	used oil	None	Tank was removed and not replaced 11-17-97.
733	35(1)PS	1,000	UST	#2 heating oil	None	Tank was removed and not replaced 4-2-97
740	40(1)PS	1,000	UST	#2 heating oil	None	Tank was removed and not replaced 4-2-97

<b>Underground and Above-Ground Storage Tanks (UST/AST)</b>						
<b>Building</b>	<b>Parcel Number</b>	<b>Size of tank Gallon</b>	<b>UST/ AST</b>	<b>Product stored</b>	<b>Release amount gallons date</b>	<b>Remediation/ present status</b>
742	38(2)PS	2 - 3,000	UST	gasoline	None	In 1990 new tanks were installed to replace the ones removed in 1987. Presently tanks are empty, out of service.
742		500	UST	#2 heating oil	None	Tank was removed and not replaced 4-3-97
746	36(1)PS	3,000	UST	#2 heating oil	None	Tank was removed and not replaced 11-17-97.
747	100(7)PS/PR /HS/HR	4,000	UST	#2 heating oil	10 - 1992	Spill was closed out by NYSDEC. Tank was removed and not replaced 11-17-97.
748	N/A	275	AST	#2 heating oil	None	Empty, out of service.
749	N/A	275	AST	#2 heating oil	None	Empty, out of service.
750	N/A	275	AST	#2 heating oil	None	Empty, out of service.
751	N/A	275	AST	#2 heating oil	None	Empty, out of service
752	134(2)PS/PR	275	AST	#2 heating oil	7 - 1992	Leaking UST was removed and replaced with a 275 gallon AST. Spill was closed out by NYSDEC. Present AST is empty, out of service.

## Environmental Protection Provisions

The following conditions will be placed in the lease to ensure there will be no unacceptable risk to human health or the environment and no interference with the ongoing SEDA Installation Restoration Program (IRP), and to ensure the regulatory requirements for IRP and other compliance programs administered by the Army are met.

1. The sole purpose for which the leased premises and any improvements thereon may be used, in the absence of prior written approval of the Government for any other use, is for sublease to YSI for use as a academy for troubled youths.
2. The Lessee shall neither transfer nor assign this Lease or any interest therein or any property on the leased premises, nor sublet the leased premises or any part thereof or any property thereon, nor grant any interest, privilege, or license whatsoever in connection with this Lease without the prior written consent of the Government. Such consent shall not be unreasonably withheld or delayed. Every sublease shall contain the Environmental Protection Provisions contained herein.
3. The Lessee and any subleases shall comply with the applicable Federal, state and local laws, regulations, and standards that are or may become applicable to Lessee's or sublessee's activities on the Leased Premises.
4. The Lessee and any sublessee shall be solely responsible for obtaining at their own cost and expense any regulatory or environmental permits required for its operation under the Lease, independent of any exiting permits. The Lessee shall also be required to obtain their own EPA Identification Number if applicable.

(a) Seneca Army Depot Activity is presently operating its air emissions points sources under a Interim Registration Certification with NYSDEC, under the Cap by Rule provisions of 6NYCRR Part 200 and 201. SEDA shall transfer to the Lessee and the Lessee shall identify any air emission point sources which its deems necessary for their use of the leased premises. The Lessee shall be solely responsible for the operation, and maintenance of the emission point sources in compliance with their registration certificate. Once approved, a copy of the registration certificate shall be submitted to SEDA. If based on reports and/or inspection by or submitted to NYSDEC it is determined that any operational changes are needed for compliance with the Lessee's registration certificate. The Lessee agrees to upgrade and/or change its operations to met the requirements at no cost to the government. Copies of all reports as well as any correspondence from NYSDEC pertaining to these emission point source, registration certificate shall be submitted to SEDA. Should the transfer of these emission point sources be disapproved, the Lessee shall be solely responsible for applying for and obtaining a new registration certificate.

(b) SEDA shall transfer to the Lessee it's NYSDEC State Pollutant Discharge Elimination System (SPDES) Permit, DEC #: 8-4530-00006/00002-0, outfall 002 for the operation of building 715 waste water treatment plant. Once approved a copy of the permit shall be submitted to SEDA. The lessee shall be solely responsible for the operation, and maintenance of the plant in compliance with their SPDES permit. If based on reports and/or inspections by or submitted to NYSDEC it is determined that any operational changes are needed for compliance with the lessee's SPDES permit. The lessee agrees to upgrade the plant and/or change its operations to met the requirements at no cost to the government. Copies of all monthly reports as well as any correspondence from NYSDEC pertaining to the operation of the plant shall be submitted to SEDA. Should the transfer of the SPDES permit be disapproved, the Lessee shall be solely responsible for applying for and obtaining a new SPDES permit.



(c) SEDA shall submit a petroleum bulk storage (PBS) registration modification to NYSDEC changing the name of the operator of 7 petroleum storage tanks, located on the proposed lease property, to indicate the lessee as the operator. Those tanks are located at, building 710 - 1,000 gallon UST, building 717 - 40,600 gallon AST, building 718 - 10,000, 20,000, and 40,000 gallon UST's and building 742 - two 3,000 gallon UST's. The lessee shall be responsible for maintaining these tanks in compliance with NYSDEC regulations. Should the Lessee or sublessee determine that the installation of any additional petroleum storage tank are necessary for their operations the tanks shall be aboveground only and if required by NYSDEC regulations, will be registered with the NYSDEC by the lessee or sublessee as the owners and operators of said tanks. The installation of belowground tanks shall be prohibited.

5. The Government's rights under a Lease specifically include the right for Government officials to inspect upon reasonable notice the Leased premises for compliance with environmental, safety, and occupational health laws and regulations, whether or not the Government is responsible for enforcing them. Such inspections are without prejudice to the right of duly constituted enforcement officials to make such inspections. The Government normally will give the Lessee or sublessee twenty-four (24) hours prior notice of its intention to enter the Leased Premises unless it determines the entry is required for safety, environmental, operations, or security purposes. The Lessee shall have no claim on account of any entries against the United States or any officer, agent, employee or contractor thereof.

6. The Government acknowledges that Seneca Army Depot Activity has been identified as a National Priority List (NPL) Site under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, as amended. The Lessee acknowledges that the Government has provided it with a copy of the Seneca Army Depot Activity Federal Facility Agreement (FFA) entered into by the United States Environmental Protection Agency Region II, the State of New York, and the Department of the Army, effective 23 Jan 93 and will provide the Lessee with a copy of any amendments thereto. The Lessee agrees that, should any conflict arise between the terms of the FFA as they presently exist or may be amended, and the provisions of this lease, the terms of the FFA will take precedence. The Lessee further agrees that notwithstanding any other provisions of the Lease, the Government assumes no liability to the Lessee or its sublessee or licensees should implementation of the FFA interfere with the Lessee's or any sublessee's or licensee's use of the Leased Premises. The Lessee shall have no claim on account of any such interference against the United States or any officer, agent, employee or contractor thereof, other than for abatement of rent.

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

(a) to conduct investigations, and surveys, including, where necessary, drilling, soil and water sampling, test-pitting, testing soil borings and other activities related to Seneca Army Depot Activity's Installation Restoration Program (IRP), FFA or IAG;

(b) to inspect field activities of the Government and its contractors and subcontractors in implementing the Seneca Army Depot Activity IRP, FFA or IAG;

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

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

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

8. The Lessee and any sublessee shall comply with the provisions of any health and safety plan in effect under the IRP or the FFA during the course of any of the above described response or remedial actions. Any inspections, surveys, investigation, or other response or remedial action will, to the extent practicable, be coordinated with representative designated by the Lessee and any sublessee. The Lessee and any sublessee shall have no claim on account of such entries against the United States or any officer, agent, employee, contractor or subcontractor thereof. In addition, the Lessee and any sublessee shall comply with all applicable Federal, state, and local occupational safety and health regulations.

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

10. The Lessee shall strictly comply with hazardous waste management requirements under RCRA and the New York State Department of Environmental Conservation, Hazardous Waste Management Regulations including but not limited to proper hazardous waste characterization, labeling, storage, disposal, and documentation requirements. Except as specifically authorized by the Government in writing, the Lessee must provide, at its own expense, such hazardous waste management facilities, as needed to maintain compliance with all laws and regulations. Government hazardous waste management facilities will not be available to the Lessee. Any violation of the requirements of this condition shall be deemed a material breach of this Lease.

11. Seneca Army Depot Activity accumulation points for hazardous and other wastes will not be used by the lessee or any sublessee. Neither will the Lessee or sublessee permit its hazardous waste to be commingled with hazardous waste of the Department of the Army.

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

13. The Lessee shall not construct or make or permit its sublessee or assigns to conduct or make any alterations, additions, or improvements to, or installations upon or otherwise modify or alter the leased premises in any way which may adversely affect Seneca Army Depot Activity's environmental program, environmental cleanup, human health, or the environment, without prior written consent of the Government. Such consent may include a requirement to provide the Government with a performance and payment bond satisfactory to it in all respects and other requirements deemed necessary to protect the interests of the Government. For construction or alterations, additions, modifications, improvements or installations (collectively "work") in the proximity of operable units that are part of a National Priority

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

14. The Lessee shall not conduct or permit its sublessee to conduct any subsurface excavation, digging, drilling or other disturbance of the surface or groundwater without prior written approval of the Government, with the exception of emergency repair of existing utilities. Following such an occurrence (emergency repair), Seneca Army Depot Activity will be immediately notified of such occurrence, before any excavated soil is moved from the location or re-introduced to the sub-surface. Seneca Army Depot Activity will remain responsible for management of excavated soils to be disposed of off-site.

15. LEAD BASED PAINT WARNING AND COVENANT:

(a) The Leased Premises do not contain any government family housing dwellings. The Leased Premises do include buildings for institutional type living (barracks) and will not be occupied by children under the age of 13 years old. The Lessee is notified that the Leased Premises contain buildings built prior to 1978 that contain lead based paint. Such property may present exposure to lead from lead based paint that may place young children at risk of developing lead poisoning. Lead poisoning in young children may produce permanent neurological damage, including learning disabilities, reduced intelligence quotient, behavioral problems and impaired memory. A risk assessment or inspection for possible lead based paint hazardous is recommended to be conducted by the Lessee, prior to the lease.

(b) The Lessee has been provided with a copy of the federally approved pamphlet on lead poisoning prevention. The lessee hereby acknowledges receipt of said pamphlet.

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

(d) The Lessee shall not permit use of any building or structures on the Leased Premises for residential habitation, except for the use of institutional type living. The Lessee shall not permit use of the institutional type living (barracks) by children under the age of 13 years old, without first obtaining written consent from the Army. As a condition of its consent, the Army may require the Lessee to: (1) inspect for the presence of lead based paint and/or lead based paint hazards; (2) abate and eliminate lead based paint hazards by treating any defective lead based paint surface in accordance with all applicable laws and regulations; (3) comply with the notice and disclosure requirements under applicable Federal and state laws. The Lessee agrees to be responsible for any future remediation of lead based paint found to be necessary on the Leased Premises.

(e) The Army assumes no liability for remediation or damages for personal injury, illness, disability, or death, to the Lessee, its successors or assigns, sublessee or to any other person, including members of the general public, arising from or incident to possession and/or use of any portion of the Leased Premises containing lead based paint as residential housing. The Lessee further agrees to indemnify and hold harmless the Army, its officers, agents and employees, from and against all suits, claims, demands, or actions, liabilities, judgments, costs and attorney's fees arising out of, or in manner predicated upon, personal injury, death or property damage resulting from, related to, caused by or arising out of the possession and/or use of any portion of the Leased Premises containing lead based paint as residential housing. This section 16 and the obligations of the Lessee hereunder shall survive the expiration or termination of this Lease and any conveyance of the Leased Premises to the Lessee. The Lessee obligation hereunder shall apply whenever the United States of America incurs costs or liabilities for action giving rise to liability under this section.

16. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT:

(a) The Lessee is hereby informed and does acknowledge that friable and non-friable asbestos or asbestos containing materials (ACM) has been found on the Leased Premises, as described in the base wide EBS. The ACM on the Leased Premises does not currently pose a threat to human health or the environment. All damaged friable asbestos identified during the most recent inspection and/or reinspection has been abated or repaired.

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

17. NOTICE OF POLCHLORINATED BIPHENYLS (PCBs) EQUIPMENT AND COVENANT:

Until the results of the PCB survey are available all transformers will be considered as PCB.

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

19. The Army has determined that five parcels of property contained within the Leased Premises shall be, in addition to the restrictions listed above, further restricted in their use until complete site investigations are completed and either cleared for use or have been remediated. These five sites will have signs placed around their perimeter. The signs will read "RESTRICTED AREA AUTHORIZED PERSONNEL ONLY". Enclosure 6 page 1.

(a) Parcel 101(6)PS/PR/HS/HR restricted area consist of an area west of building 718 as indicated on enclosure 6 page 2. Entry into this area shall be restricted to persons who are authorized and informed of the site.

(b) Parcel 100(7)PS/PR/HS/HR restricted area consist of entire area located inside the fenced area surrounding building 747 as well as the building itself as indicated on enclosure 6 page 3. Entire area and building shall not be utilized/occupied for any reason. Entry into this area shall be restricted to persons who are authorized and informed of the site.

(c) Parcel 113(7) restricted area consist of all the land West of the fence around building 715. Which is boarded by the ammo area fence on the south and the access road on the north to a point where the ammo area fence runs parallel to the access road and as indicated on enclosure 6 page 4. Entire area shall not be utilized for any purpose. Entry onto this area shall be restricted to persons who are authorized and informed of the site.

(d) Parcel 139(7) restricted area consist of grass covered depression, northeast of the swimming pool and south of building 732 as indicated on enclosure 6 page 5. Entire depression/area shall not be utilized for any purpose. Entry onto this area shall be restricted to persons who are authorized and informed of the site.

(e) Parcel 140(7) restricted area consist of grass covered mound located northeast of building 710, and south of the parking area for building 750 and as indicated on enclosure 6 page 6. Entire area shall not be utilized for any purpose. Entry onto this site shall be restricted to persons who are authorized and informed of the site.

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

REGULATOR COMMENTS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

Re: Draft Finding of Suitability to Lease (FOSL) for SEDA North End Property

This is in response to SEDA's November 18, 1997 document referenced above and received by EPA on November 20, 1997. The majority of EPA comments were provided in draft form on December 17, 1997. Our final comments are summarized below.

GENERAL COMMENTS

The FOSL does not discuss the environmental condition of parcels adjacent to the North End Property. BRAC Parcels 123Q-RD, 124Q-RD, 126Q-RD, 127Q-X, 53(5)HR, 103(6)HR, 98(6)PS/HS/HR, 99(6)PS/PR and 104(6) PR/HS/HR were classified by the Army for purposes of the EBS as "Areas where storage, release, disposal or migration of hazardous substances or petroleum products has occurred, but required removal or remedial actions have not yet been initiated." As the North End Property is to be used as a correctional facility, and to ensure protection of human health and the environment, restrictions of access and entry by residents and employees to these adjacent parcels are necessary. The FOSL should discuss the existing hazardous substances at the adjacent properties, state the security measures that already exist to restrict access, the additional restrictions and high security measures that are necessary to protect the institutional residents and employees from the hazards and who will be providing these before the institutional use can begin.

*The above comments are addressed in the rewritten paragraph "3.10 Other Hazardous Conditions (Adjoining Property)" and in the added "Table 1A- Army Owned Adjacent Property - Environmental Condition".*

The FOSL states that the lessee, will be operating the waste water treatment plant located within the North End Property. According to MAP 3-2 of the *Reuse Plan and Implementation Strategy published by the LRA December 1996* (Reuse Plan), the adjacent property east and south also utilizes this treatment plant. These adjacent parcels are areas where storage, release, disposal or migration of radioactive substances has occurred in the past. The FOSL should state that operation of the waste water treatment plant should include monitoring for radioactive substances.

*Comment noted.*

EPA comments continued.

SEDA informed us that this FOSL was prepared according to Draft Army Guidance dated August 22, 1997. The Army has not provided EPA Headquarters with a copy nor an opportunity to comment on the guidance. EPA policy is to use the Model FOSL (copy attached) included in documents from the *December 1995 Base Realignment and Closure Cleanup Team (BCT) Training Conference*. SEDA, EPA and State members of the SEDA BCT participated in this conference and have copies of the guidance. All SEDA FOSLs and FOSTs should be prepared according to guidance accepted by EPA.

*FOSL has been rewritten to follow the Model FOSL format adopted by The Department of Army and Army Materiel Command.*

The most current Environmental Baseline Survey (EBS) is dated October 30, 1996. Therefore, the Army should prepare a parcel-specific Supplemental EBS to be attached to this FOSL. The Supplemental EBS is discussed in the *December 1995 Base Realignment and Closure Cleanup Team (BCT) Training Conference* guidance.

*Supplemental EBS is not required because the North Depot Area has been closed/mothballed and inactive since the original EBS.*

Tom Grasek of your staff informed us on December 9 that Building 800 is not included in the FOSL for the North End Property. The FOSL, figures and attachments should be clarified so there are no future misunderstandings.

*Building 800 is not part of this FOSL and has been eliminated from enclosure 1 page 3.*

As the North End Property is to be used as a correctional facility with dormitories from existing buildings. To ensure protection of human health, the Army should discuss the applicability of *The Residential Lead-Based Paint Hazard Reduction Act of 1992* to this FOSL.

*Lead Based Paint issues are covered in "Enclosure 4 Environmental Protection Provisions paragraph 15 (a), (b), (c), (d), and (e).*

#### SPECIFIC COMMENTS

1. Purpose:

The intended use under the lease should be stated.

*This paragraph was changed to include a description of the intended use under the lease.*

EPA comments continued.

Section 3. Environmental Conditions of the Property:

The Army should explain why they chose to base the determination on the March 22, 1996 *Draft Environmental Baseline Survey Report (EBS)* and not the revised document dated October 30, 1996. The determination of the environmental condition of the facilities and property in this lease should be reevaluated using the most current EBS and Supplemental EBS, and the FOSL should be corrected where ever necessary.

*The Army did use EBS dated March 22, 1996 as revised on October 30,1996 Section 3 has been changed to indicate this.*

*SEDA's Asbestos Management Plan, SEDA's Radon Survey, SEDA's Radiation Surveys, SEDA's most recent Spill Prevention, Control and Countermeasure (SPCC) Plan, with all appendices, and the NYSDEC Region 8 Spill List should have been included as attachments to the FOSL. These documents and all the NYSDEC spill reports (2 page report per spill) should be included as attachments to the FOSL, in order to provide documentation for the findings included in the FOSL.*

*These documents will not be included as attachments to the FOSL. But will be available at SEDA should they be needed.*

3.1 Environmental Conditions of Property Categories:

If the categories are listed, the definitions should also be included in this section.

*This section 3.1 has been changed to include the definitions of the categories.*

EPA's March 26, 1997 EBS letter states that we are unable to concur that any part of the North Depot is "uncontaminated". The area is surrounded on three sides by property where hazardous substances have been released and further investigations are scheduled to characterize the extent of contamination, but no remediation has been initiated. We also stated that we are unable to concur that any of the structures identified as having a potential for the release to the . environment of lead based paint or asbestos are "uncontaminated". At this time, EPA can only concur that Property at the North Depot should be classed as Category 6 and/or 7.

*Comment noted.*

3.2 Storage, Release, or Disposal of Hazardous Substances:

The text of this section should be revised to address the comments for Table I and Table 2 that also apply.

*Comment noted.*



EPA comments continued.

### 3.3 Petroleum and Petroleum Products:

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

The text of this section should be revised to address the comments for Table 1 and Table 2 that also apply.

*Comment noted.*

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

The text of this section should be revised to address the comments for Table 1 and Table 2 that also apply.

*Comment noted.*

Building 746: What is the condition of the battery room spill containment system?

*Good unused condition, there is no record of any spills in the battery room.*

### 3.4 Polychlorinated Biphenyl (PCB) Equipment:

Mr. Grasek informed us that a full inspection of all transformers at SEDA will be conducted, but the time frame is not certain. EPA reserves the right to comment on this section of the FOSL, until after we have been able to review the results of the North End Property.

*Survey has been scheduled for Feb. 1998.*

### 3.5 Asbestos:

The FOSL fails to state who will be required to monitor the condition of existing Asbestos Containing Material (ACM) during the period of the lease. The FOSL fails to state that the Lessee will be required to submit an appropriate asbestos disposal plan to the Army prior to conducting any remediation activities.

*Environmental Protection Provisions paragraph 16(b) address' this comment.*

Neither the *Asbestos Management Plan Seneca Army Depot Activity, Romulus, New York* nor Table G-1 of the EBS contain information on buildings 730, 717 or 741. Corrections should be made as appropriate.

*Although these structures are given building numbers they are not buildings. Building 730 is a water tower, Bldg. 717 is a 40,600 gallon aboveground petroleum storage tank, and bldg. 741. is a marquee. Therefore corrections were not necessary.*

EPA comments continued.

The Asbestos Management Plan has no information on buildings 754 or S-714.

***Building 754 will be added to the Asbestos Management Plan during its next update. S-714 does not exist. Building 714 is the bowling alley and is already in the Asbestos Management Plan.***

There is a discrepancy between the FOSL, Asbestos Management Plan and Table G- I of the EBS. The FOSL & plan state there is ACM in floor tile for building 724 but the EBS says fully remediated. The FOSL makes no mention of building 705A, but the EBS states that there is asbestos present, with no remediation, done. Corrections should be made to the FOSL, Asbestos Management Plan and/or included in the Supplemental EBS as appropriate.

***The Asbestos Management Plan is updated annually and/or whenever a building is reinspected or has abatement work completed. Therefore the Management Plan would be the most up to date source of information on asbestos.***

There is a discrepancy between the Asbestos Management Plan and Table G-1 of the EBS for building 702. The Asbestos Plan states that there is no ACM present, but the EBS states that asbestos has been partially remediated. The Asbestos Plan or the Supplemental EBS should be corrected as appropriate.

***See comment above.***

The Asbestos Management Plan copy received by EPA has no date.

***The Asbestos Management Plan was last updated 12-2-97.***

### 3.6 Lead Based Paint (LBP):

Appendix G, Table G-2 *Potential Lead-Based Paint Hazards at the Seneca Army Depot Activity* of the EBS lists the buildings and structures at SEDA with a designation for lead based paint potential, This table shows building 711 as built before 1978, therefore the potential for lead paint exists. Table G-2 did not list buildings 734 or 749 at all. Buildings 711, 734 and 749 should be deleted from this section of the FOSL which lists the buildings where LBP is presumed not to be present, or an update with explanation of the discrepancy should be included in the Supplemental EBS. In order to protect human health and the environment, the FOSL should also restrict construction, alteration, or modification (to include paint stripping or, sanding) without prior testing of the paint and notification of and approval by the Army prior to the initiation of the activity.

EPA comments continued.

***Building 711 Sentry Station Post 3 was completely renovated in 1992. Building 734 concrete block generator building was built in 1987. Building 749 Dog kennel was built in 1987. These buildings will remain on the list where LBP is presumed not to be present.***

***Enclosure 4 Environmental Protection Provisions paragraph 15(a) Lead Based Paint Warning and Covenant recommends the Lessee conduct risk assessments or inspection which could include testing of paint.***

### 3.7 Radiological Sources or Contamination:

The 1994 surveys indicating the areas are suitable for unrestricted use should be attached to the lease. EPA requested these surveys on December 1, 1997 and received surveys for buildings 703 and 720 from SEDA on December 8. Mr. Grasek explained during our telephone conversation December 9 that the results for building 747 are missing, but building 747 will be resurveyed with the results sent to EPA by January 1, 1998. EPA reserves the right to comment on this section of the FOSL, until after we have been able to review the results. The EBS does not identify these buildings for radiological sources or contamination. Therefore, the Supplemental EBS should include the information.

#### ***Comment noted.***

The survey information for buildings 720 and 703 included gross alpha, gross beta, and gamma exposure readings for the surfaces in the rooms indicated. The space for gamma measurements on the Radiation Survey form indicates that the units are in mR/hr. These gamma exposure readings are prohibitively high, and certainly not supporting unrestricted use of the property. Did the technicians filling out the form intend the units to be in uR/hr? Let us know if this is the case. The instrumentation sheets gave no units for the gamma readings. This omission should be corrected.

***Based on a review of the survey it was determined that the instrument used for the Gamma measurements was reading in uR/hr this correction will be made on the old survey forms and had already been done on the new survey forms used for building 747 resurvey.***

### 3.8 Radon:

EPA received the radon survey December 8, 1997. The results column should include units. There is no documentation for Buildings 749, 725, 727, 728, 730, 721, 733, 719, 717, 716, 755, 748, 754, and 741. Therefore, the statement that radon levels are below 4 picocuries per liter in all buildings cannot be supported. The FOSL text should be corrected. The surveys should be included as an attachment to the FOSL.

EPA comments continued.

A review of the data provided shows all but one data point indicating minimal radon levels in the buildings. The one anomalous data point (5.4 pCi/l) was found in an area of building 703 that had low levels in the other measured areas. If the area in question happens to be a suspect area (e.g. a lower level of the building or basement) that is markedly different in location from the others, a retest may be warranted if it has the possibility of being used as a primary working or living space. No information is given on the method of radon detection used.

***Section 3.8 Radon has been rewritten to provide more information. The radon survey results will not be included as an attachment to the FOSL but are available at SEDA should they be needed***

Section 3.10 Adjoining Property:

The first sentence represents a gross error of judgment on the Army's part. How can they determine that there are no human health or the ecological threats posed by adjacent properties to the east, west and south, when those, BRAC Parcels 123Q-RD, 124Q-RD, 126Q-RD, 127Q-X, 53(5)HR, 103(6)HR, 98(6)PS/HS/HR, 99(6)PS/PR and 104(6) PR/HS/HR were classified by the Army for purposes of the EBS as "Areas where storage, release, disposal or migration of hazardous substances or petroleum products has, occurred, but required removal or remedial actions have not yet been initiated."? This section should be corrected.

***Section 3.10 Adjoining Property has been rewritten to provide more information.***

Section 6. National Environmental Policy (NEPA) Compliance and Consistency with the Local Reuse Plan: EPA just received the Draft Environmental Impact Statement (EIS) for BRAC95 Disposal and Reuse of property at the Seneca Army Depot Activity, New York on December 4, 1997. The statements in Section 6 of the FOSL should be deleted until they can be supported by a finalized EIS.

***Comment noted.***

The intended reuse of the property should be stated.

***Intended reuse of the property has been added where appropriate.***

Section 8. Finding of Suitability to Lease:

The second sentence incorrectly states, "All removal or remedial actions necessary to protect human health and the environment have been taken...". The author clearly is not discussing conditions at SEDA, perhaps another Army site? The documents from the

EPA comments continued.

December 1995 (BCT) Training Conference contain appropriate language and should be followed.

In addition, Part II of the covenant should be cited which warrants that any response action or corrective action found to be necessary after the lease begins shall be conducted by the United States; and a clause granting the United States access to the property in any case in which a response action or corrective action is found to be necessary, or such access is necessary to carry out a response action or corrective action on adjoining property.

*FOSL has been rewritten to follow the Model FOSL format adopted by The Department of Army and Army Materiels Command.*

Enclosure 1.

The maps are of poor quality and include no title blocks or legends to support their value to the FOSL.

*Comment noted.*

Enclosure 2. Table 1- Description of Property and Environmental Condition  
EPA's March 26, 1997 EBS letter states that we are unable to concur that any part of the North Depot is "uncontaminated". See comments for Section 3. 1.

*Comment noted.*

This table includes parcels that were, not identified in the EBS. The Supplemental EBS should include this new information.

*Comment noted.*

The documentation/spill records which support the release status should also be referenced and attached to the FOSL.

*Comment noted.*

Parcel 136(2)PR: This is described as the fuel oil release from Bldg. 718 (heat plant) contained in secondary sewage treatment facility Bldg. 715. This spill should also be listed in Table 2. What is the date of the spill and the NYSDEC Spill Number? Perhaps this is the spill mentioned in EPA's March 26, 1997 EBS letter, where the location was unknown, but 3,000 gallons of fuel oil spilled. Some product was contained in the boiler room, the rest went to the treatment plant, and a small amount to a Seneca Lake Tributary.

EPA comments continued.

***This spill has been added to Table 2. The date of the spill was 10-5-87, it was closed out by NYSDEC on 4-19-90. NYSDEC spill # 8910830.***

Rumor #8: A "hill" is readily evident north of Post 3, where reportedly drums were buried. EPA in our March 26, 1997 letter said we could not concur that this area is "uncontaminated" and that it should be included in the Sampling and Analysis Recommendations for investigation. Rumor #8 should be included in Table 1.

***Rumor #8 is included in Table 1 as BRAC parcel number 140(7).***

Enclosure 3. Table 2

Notification of Hazardous Substance and Petroleum Products Storage, Release or Disposal The information in Table 2 should be revised to follow Attachment 3 of the Model FOSL guidance. The documentation/spill records which support the release status should also be referenced and attached to the FOSL.

***Comment noted. The documentation/spill records which support the release status will not be included as attachments to the FOSL. But will be available at SEDA should they be needed.***

EPA's March 26, 1997 EBS letter states that we are unable to concur that any part of the North Depot is "uncontaminated". See comments for Section 3. 1.

***Comment noted.***

Parcel 136(2)PR mentioned in Table 1 describes a fuel oil spill related to building 715 and 718. This spill should also be listed in this section of Table 2.

***This spill has been added to Table 2.***

Appendix F(Depot Spill Log) of SEDA's SPCC states that on June 10, 1997 10 gallons of diesel fuel spilled at building 721, but the FOSL does not mention the spill. The Table and text of the FOSL should be corrected.

***This spill has been added to Table 2 and to Section 3.3.1 Storage, Release, or Disposal of Petroleum or Petroleum Products.***

EPA comments continued.

The general comments in EPA's March 26, 1997 EBS letter describes at least six spills occurring at SEDA, identified in the State Spill Records with the exact locations unknown. The North Depot Property cannot be ruled out as the possible location of these spills. Perhaps the six spills should be added to Table 2.

***Comment noted.***

The Supplemental EBS should include any new information available after the EBS was published.

***Comment noted.***

Underground and Above-Ground Storage Tanks (UST/AST)  
Building 729: The 2,000 gallon fuel oil tank and 550 diesel tank associated with this building and discussed in the SPCC are not mentioned in the table.

***These two tanks have been added to Table 2.***

Building 718: The 10,000 gallon waste oil tank associated with this building is discussed in the SPCC, but not mentioned in this table.

***This tank has been added to Table 2.***

Buildings 715 and 718: The Fuel Oil Tank Summary of the SPCC lists the status of these tanks as "N", but the FOSL states out of service "OS". The discrepancy should be explained or corrected.

***Presently these tanks are out of service.***

Buildings 701, 710, 717, 718, 732, 742, 748, 749, 750, 751 and 752: According the Fuel Oil Tank Summary of the SPCC, there are no security provisions in place for the tanks associated with these buildings. The FOSL should discuss the restrictions and security measures that are necessary to protect the institutional residents and employees and who will be providing these before the institutional use can begin

***SEDA plans on removing all these tanks except building 710, 717, 718, and 742 prior to the signing of the lease. Enclosure 4 Environmental Protection Provisions, has had section 4(c) added, which indicates that the lessee will be responsible for these remaining tanks and any additional tanks the lessee may install in the future.***

EPA comments continued.

If any of the information in this table is more current than the EBS, the Supplemental EBS should include the updated information.'

*Comment noted.*

According to State Spill Records, the release at building 742 occurred in 1987 and not 1990.

*Tables 1 and 2 have been changed to indicate the correct year which is 1987.*

Enclosure 4. Environmental Protection -Provisions: Section 16.0.1

Will the Army be responsible for the risk assessment or inspection recommended in the last sentence? The text should be clarified.

*This section which is now Section 15(a) has been changed to indicate that the recommended risk assessment or inspection be performed by the lessee, prior to the lease.*

Section 16.0.4

The Reuse Plan and Implementation Strategy published by the LRA December 1996 states that the future use of the North End Property will be "Institutional", with the possibility of a correctional institution. Another possibility is that the property becomes the location of a school, with dormitories, for adolescents. Even if the institutionalized individuals live at the North End Property for only one year, EPA considers this to be residential use. Section 16.0.4 of the FOSL states, "The lessee shall not permit use of any building or structures on the lease premises for residential habitation". This contradicts the Reuse Plan and the FOSL should be corrected.

*This section which is now Section 15(d) has been changed to indicate that institutional type living, by children age 13 and older will be permitted.*

Section 17.0.

General comment: The restricted access descriptions for each parcel are deficient. For all Parcels which are or should be included in this section, which will be further restricted in their use until site investigations and remediation have been completed, the FOSL should discuss the existing hazardous substances, state the security measures that already exist to restrict access, the additional restrictions and high security measures that are necessary to protect the institutional residents and employees from the hazards and who will be providing these before the institutional use can begin.

*This section which is now Section 19 has been changed to better describe and identify the five restricted parcels.*



EPA comments continued.

General comment: The map section should include a figure for each parcel indicating the security measures existing and additional measures necessary to restrict access and protect the residents and workers from the current hazards.

*Maps of each restricted parcel are now included with the FOSL as enclosure 6 pages 1 through 6.*

BRAC Parcel Number 100(7)PS/PR/HS/HR: The EBS states that this building was used to store battery acids and paints and that releases of petroleum product and solvents occurred. This information should also be included in Table 1. The text discussing restrictions on these areas is incomplete. See general comment in this section for information to be included.

*BRAC Parcel 100 is covered in Section 19(b) and enclosure 6 page 3.*

BRAC Parcel Number 101(6)PS/PR/HS/HR: Please define "buffer zone". TPH has been detected in soils at SEAD-41 and remedial action has been recommended by the Army's contractor. This SEAD should also have restricted access. Elevated TPH was detected in soils and groundwater at SEAD-32, with a mini-risk assessment recommended by the Army's contractor. This SEAD should also have restricted access. The text discussing restrictions on these areas is incomplete. See general comment in this section for information to be included.

*BRAC Parcel 101 is covered in Section 19(a) and enclosure 6 page 2.*

BRAC Parcel Number 102 was classified as Category 6 in the EBS due to stained soil around the fueling station. Access to this parcel should also be appropriately restricted. See general comment in this section.

*BRAC parcel Number 102 is now a Category 2 and is not restricted.*

BRAC Parcel Number 113(7): A visual inspection during 1995 revealed several suspected mounded areas and a rusty drum protruding from the soil. The text is confusing and does not give a clear picture of how access will be restricted. See general comment in this section for information to be included. The map section of the FOSL should include one figure devoted to this parcel and its security measures. This parcel is west of building 715, not east.

*BRAC parcel 113 is covered in Section 19(c) and enclosure 6 page 4.*

EPA comments continued.

BRAC Parcel Number 125 (6) Q-X: Building 744 is an indoor range and will be surveyed for lead. Why is there no restricted access for this parcel?

*The indoor range operation was shut down. Based on the results of the swipe samples taken after the range area was cleaned it was determined that the range area and its related ventilation system are within regulatory limits for lead.*

*However a lead survey by SEDA personnel, on 1-22-98, of the bullet collection system/area behind the bullet backstop. Indicated that lead, in the form of bullet fragments is present in that area.*

BRAC Parcel Numbers 139(7) and 140(7): The text discussing restrictions on these areas is incomplete. See general comment in this section for information to be included.

*BRAC parcel 139 is covered in Section 19(d) and enclosure 6 page 5.*

*BRAC parcel 140 is covered in Section 19(e) and enclosure 6 page 6.*

New York State Department of Environmental Conservation  
50 Wolf Road New York 12233-7010

The New York State Department of Environmental Conservation has reviewed the Draft Finding of Suitability to Lease (FOSL) transmitted with cover letter dated November 18, 1997 for the 165.88 acre North End Property and offer the following:

General Comments:

The title of the document ("Finding of Suitability to Lease") should include the working description of the parcel (i.e.; North End Property) for ease of identification. It would also be beneficial to include "draft" in the title and to assign a date to the draft document for purposes of reference. Therefore, rather than referencing the cover letter, this document could be referenced in correspondence as, for example, the "Draft Finding of Suitability to Lease for the North End Property, November 1997."

*FOSL has been rewritten to follow the Model FOSL format adopted by The Department of Army and Army Materiels Command. This includes a title page, with date and a working description of the proposed lease parcel.*

As we discussed at the BCT meeting of December 18, some other agencies develop "Supplemental Environmental Baseline Surveys" as companion documents to FOSLs to update information contained in the ever-aging Environmental Baseline Survey. Enclosed with this letter is an example.

*Comment noted. See above comment.*

Also enclosed is a checklist titled "Environmental Factors Considered" which was taken from Department of Defense training documents. The checklist presents important relevant information in a easy-to-read manner, and it is suggested that a completed checklist be included in this and each subsequent FOSL.

*Comment noted. See above comment.*

Specific Comments:

Section 1 - Purpose: This section should describe the specific intended use of the property, the length of the lease and any physical modifications to the property planned, if any.

*This paragraph was changed to include a description of the intended use under the lease.*

NYSDEC comments continued.

Section 2 - Property Description: The words “a description of or “a listing of” should begin the last sentence in this section. Also, a more detailed description of the location of the property would be helpful.

*Change has been made.*

ECP category. If a certain parcel has changed ECP Category since the EBS, this section should be updated and a reason for the change(s) described.

*This section 3.1 has been changed to include the definitions of the categories.*

Section 3.3 - Petroleum and Petroleum Products: The first two sentences in this section should be merged, with the period after “FOSL” being changed to a comma, “With” being de-capitalized, and “except” changed to “exception.” The document might be less confusing if the final sentence of this section was deleted as the following section discusses petroleum products storage, release, or disposal.

*Change has been made.*

Section 3.4 - Polychlorinated Biphenyl (PCB) Equipment: It is unknown whether "TBD" indicates that the condition of the FOSL property relative to PCBs is to be determined, or whether the information to be provided in this FOSL section is to be determined. Either way, significantly more information is warranted in this section.

*Survey has been scheduled for Feb. 1998.*

Section 3.10 - Adjoining Property: There are several areas adjacent to the North End Property which require further investigation of environmental conditions. It cannot be determined at this point whether contamination within these sites, or migrating from these sites, poses a threat to human health or the environment. We strongly disagree with the statement made in this section that all adjacent property "has been determined to not pose a human health or environmental threat."

*Section 3.10 Adjoining Property has been rewritten to provide more information.*

Section 6 - NEPA Compliance and Consistency with Local Reuse Plan: The "categorical exclusion A21 " mentioned here should be described.

*Change has been made this section now includes the definition of categorical exclusion A21.*

NYSDEC comments continued.

Section 7 - Environmental Protection Provisions: This section states that enclosure 4 of the FOSL, Environmental Protection Provisions, are based upon "...results from the site specific EBS, any subsequent or additional investigations, surveys, or studies identified in the FOSL, and in consideration of the intended use of the property..... The specific intended use of the property should be described in the FOSL. A simple reference to a potentially dynamic reuse plan is not sufficient.

*Section 1 of the FOSL has been changed to include the intended use of the property.*

Section 8 - Finding of Suitability to Lease: The statement that " all removal or remedial actions necessary to protect human health and the environment have been taken" may be premature. Suggested wording below was taken from Department of Defense training documents:

"Based on the forgoing information and analysis, I find this property to be suitable to lease and that environmental conditions do not present an unacceptable risk to human health or the environment, subject to the Lease containing appropriate restrictions on the activities of future recipients as addressed above."

*FOSL has been rewritten to follow the Model FOSL format adopted by The Department of Army and Army Materiels Command.*

Enclosure 1 - Site Maps: It would be appreciated if the maps were more clear and detailed, rather than the multiple-generation photocopies offered. Map 1 should identify the parcel being leased. Map 3 is crowded.

*Comment noted.*

Enclosure 4 - Environmental Protection Provisions: This enclosure lists numerous areas to which entry "shall be restricted to persons who are authorized and informed of the site." Are these areas fenced or to be fenced? How will an "unauthorized" person know that entry is restricted, without being "informed of the site"? It is advised that all property requiring access restrictions contain physical barriers to unauthorized access.

*This section which is now Section 19 has been changed to better describe and identify the five restricted parcels.*

Additional NYSDEC comments.

**New York State Department of Environmental Conservation 50 Wolf Road, Albany, New York 12233-7010**

Please find below several additional comments on the draft Finding of Suitability to Lease (FOSL) transmitted with cover letter dated November 18, 1997 for the 165.88 acre North End Property. These comments are in addition to those forwarded on December 22, 1997.

General Comment:

It is our understanding that the sewage treatment plant (building 715) located within the North End property serves the North End as well as the high security Q-area (including SEADs 12 and 63). Further, while there is no active flow of sewage from the Q-area at this time there is a regular outflow of groundwater that has seeped into the underground sewage pipes. Since radionuclides were found in groundwater samples collected at SEADs 12 and 63 during the April 1995 "Expanded Site Investigation, Eight Moderately Low Priority AOCS" the sewage system has the potential to act as a pathway of contaminant migration. To our knowledge no efforts have been made to determine if any contaminants, in particular radionuclides, are/have migrated through the sewage system to building 715. It will be necessary to further evaluate this situation before the North End property is leased.

*Comment noted.*

Specific Comments:

Section 6 - NEPA Compliance and Consistency with Local Reuse Plan: Please provide additional information on the referenced document "Record of Environmental Consideration."

*The Record of Environmental Consideration was signed by the Commander January 13, 1998. The environmental effects of the activities anticipated under the proposed lease were determined to have appropriate categorical exclusion A21.*

Enclosure 1 - Site Maps: As mentioned in the December 22 letter, the maps in this document are of poor quality and should be improved. The map showing all of the Seneca Army Depot should also outline the North End property. The untitled map which shows the locations of the BRAC (Base Realignment and Closure) parcels does not coincide with the parcels as they are listed in the following Table 1. It is necessary to have an easy to follow map and index showing the areas within the North End property that have been identified as areas of potential concern. This document should contain a simple way to look at a parcel on a map and then look up specific information about that parcel.

*Comments noted. Maps of each restricted parcel are now included with the FOSL as enclosure 6 pages 1 through 6.*

Additional NYSDEC comments continued.

Enclosure 4 - Environmental Protection Provisions - Section 16.0.1: Who will conduct the risk assessment or inspection for possible lead based paint hazards as recommended in this section?

***This section which is now Section 15(a) has been changed to indicate that the recommended risk assessment or inspection be performed by the lessee, prior to the lease.***

Enclosure 4 - Environmental Protection Provisions - Section 17.0: This section states that parcel 100(7)PS/PR/HS/HR is one of five parcels within the North End property that will be restricted in their use until a complete site investigation is completed. However, Table 1 of this document states that no further remediation is required for this parcel. Please clarify. Additionally, how will the use restrictions recommended in this FOSL be enforced? Perhaps it would be of value to include a map showing those areas where use will be restricted within the North End property.

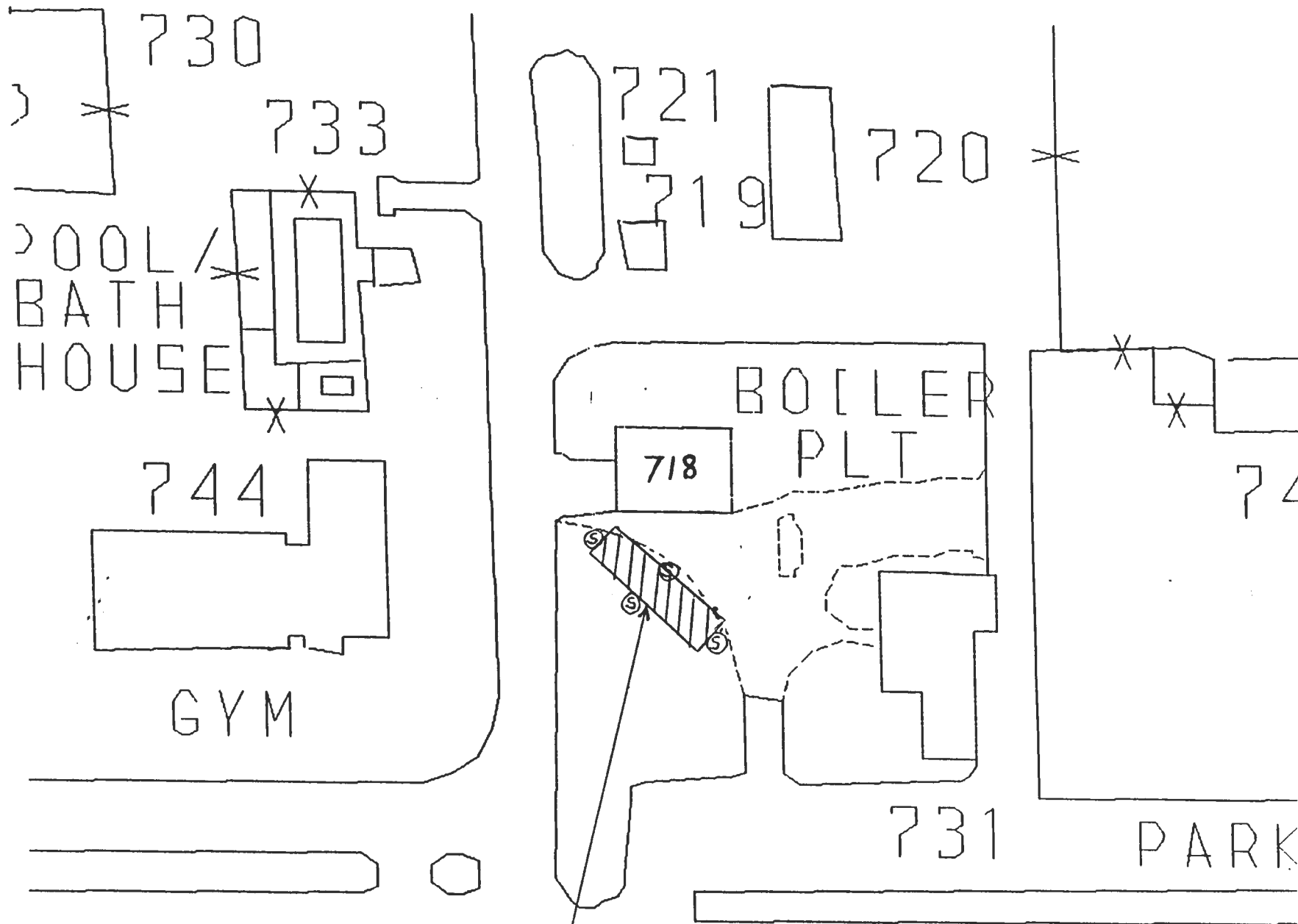
***The statement of “no further remediation required” in table 1, referred to the spill. To avoid confusion this statement has been removed from Table 1. This section which is now Section 19 has been changed to better describe and identify the five restricted parcels. Maps of each restricted parcel are now included with the FOSL as enclosure 6 pages 1 through 6.***

**S**

LOCATION OF THE FOLLOWING SIGN:

**RESTRICTED AREA  
AUTHORIZED  
PERSONNEL  
ONLY**





**RESTRICTED ACCESS**  
**PARCEL 101(6) PS/PR/HS/HR**

BALL  
LD

727 728

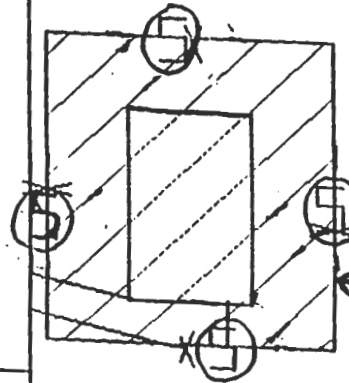
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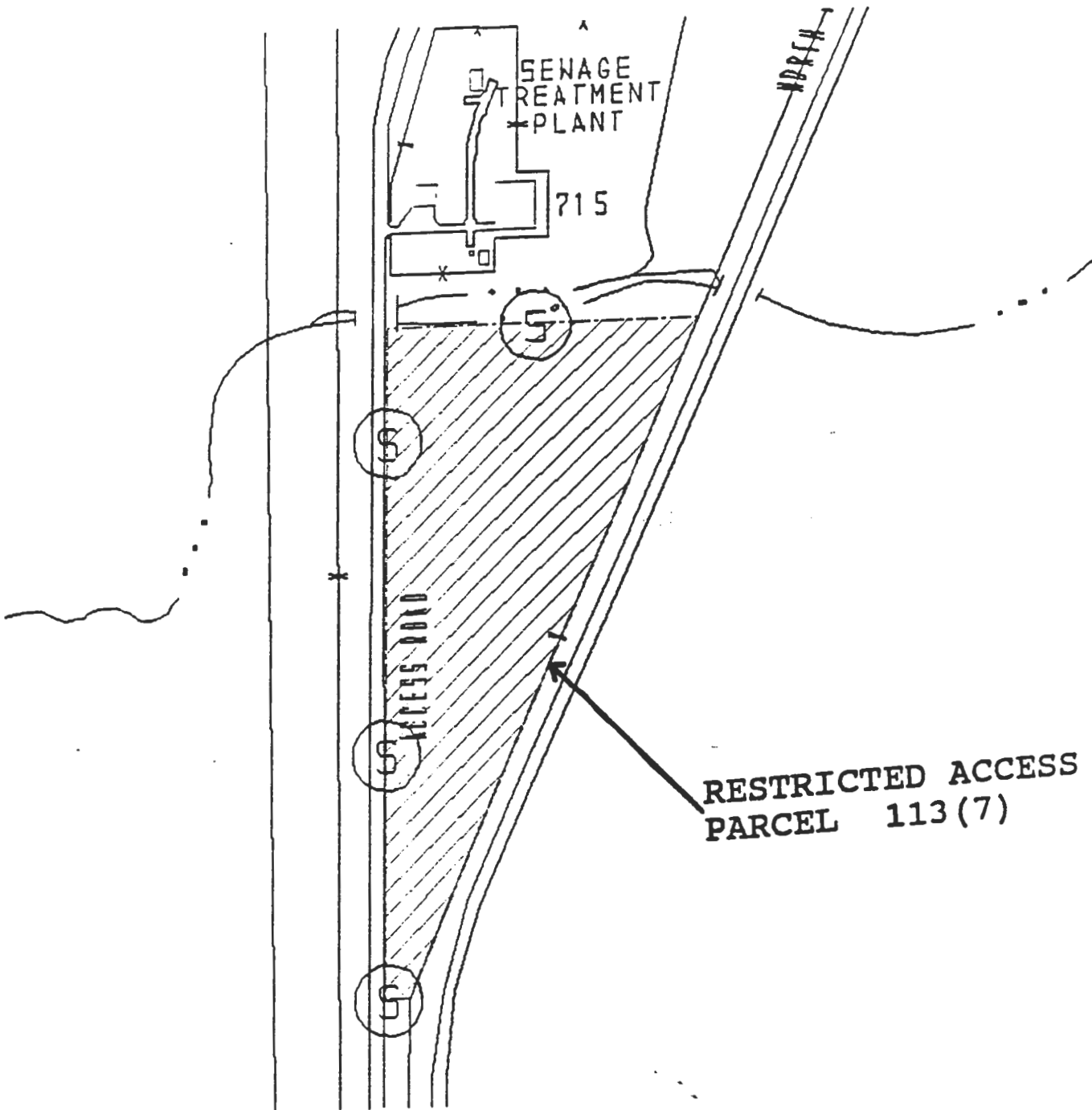


723

722 PKG

FIRE STA

RESTRICTED ACCESS  
PARCEL 100(7)PS/PR/HS/HR



RESTRICTED ACCESS  
PARCEL 139(7)

