



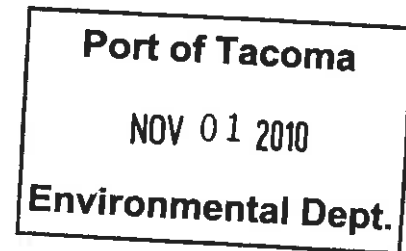
DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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Ser BPMOW.wlt/0053
October 25, 2010

Mr. Jonathan Williams
Remedial Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900, ECL-111
Seattle, WA 98101

Mr. Barry Rogowski
Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
P.O. Box 47600
Olympia, WA 98504-7600

Mr. Stan Leja
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Southwest Regional Office
Hazardous Wastes & Toxics Reduction Program
P.O. Box 47600
Olympia, WA 98504-7600



SUBJECT: SIGNED FINAL FINDING OF SUITABILITY TO TRANSFER (FOST) FOR
NAVAL AND MARINE CORPS RESERVE CENTER, TACOMA,
WASHINGTON

Dear Mr. Williams, Mr. Rogowski, and Mr. Leja:

Enclosure (1), the signed *Final Finding of Suitability to Transfer (FOST) for Naval and Marine Corps Reserve Center, Tacoma, Washington*, is provided for your records. The Department of the Navy thanks you and all other individuals in your agencies who helped in reviewing and evaluating this document.

If you have questions, please contact Mr. George Patrick Brooks, BRAC Environmental Coordinator, at (619) 532-0953 or Ms. Wendy Thornton, Disposal Project Leader, at (619) 532-0937.

Sincerely,

WILLIAM R. CARSILLO
Base Closure Manager
BRAC Program Management Office

Ser BPMOW.wlt/0053
October 25, 2010

Enclosure: 1. *Final Finding of Suitability to Transfer (FOST) for Naval and Marine Corps Reserve Center, Tacoma, Washington*

Copy to: (w/encl)
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Port of Tacoma
P.O. Box 1837
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FINAL

FINDING OF SUITABILITY TO TRANSFER

**NAVAL & MARINE CORPS RESERVE CENTER
TACOMA, WASHINGTON**



Prepared By:

Department of the Navy
BRAC Program Management Office West
1455 Frazee Road, Suite 900
San Diego, CA 92108

October 2010

The disposition of Site 1 has become associated with the UST 4 decommissioning; therefore, the comments set forth in Section 3.3.3 below may be relevant, including comments in the last paragraph of that section.

3.3.2 Resource Conservation and Recovery Act (RCRA)

Hazardous waste is regulated under the Resource Conservation Recovery Act (RCRA). NMCRC Tacoma is a conditionally exempt small-quantity generator of hazardous waste (ID #WA2170090037) (USEPA 2007b) producing less than 1,000 kilograms per month and primarily consists of used oil, antifreeze, flammable solvents, flammable debris, and paint (DON 2006). Hazardous waste is accumulated in 55-gallon drums and is secured in export containers located adjacent to the southeast corner of Building 55 and is removed from the facility under a Defense Reutilization and Marketing Service contract by Phillips Environmental Services (DON 2006).

The Occidental Site is a RCRA Corrective Action site.

3.3.3 Underground Storage Tanks/Above Ground Storage Tanks

Six USTs were decommissioned and removed at NMCRC Tacoma during 1993 in accordance with the Ecology's Independent Cleanup Program. All six USTs previously contained fuel for the facility's boilers. One 24,000-gallon tank (UST 3), two 12,000-gallon tanks (USTs 1 and 2), and one 300-gallon tank (UST 1X) were located near Building 51; one 4,000-gallon tank (UST 4) was located near Building 57; and one 3,500-gallon tank (UST 5) was located near Building 55.

Prior to tank decommissioning, a visual inspection indicated that some leakage had occurred around UST 4, which is consistent with observations made during the 1988 Preliminary Assessment. Petroleum-impacted soil was also observed in the soils beneath UST 2 and UST 4. Soil was excavated until there were no further visible signs of contamination within the excavation. Upon confirmation that the soil in the excavated areas was below the Ecology cleanup levels for total petroleum hydrocarbons, the excavations were backfilled with clean soil. To achieve the cleanup levels, approximately 166 tons of soil was removed from the site and transported to an offsite recycling facility. The Decommissioning Report concluded that the UST sites were considered to be a "clean closure" and that no further testing or investigations associated with the USTs or ancillary piping were considered necessary (NWSGC 1993). It should be noted that the Decommissioning Report erroneously reports the presence of groundwater contamination. The text of the report states that the second water sample collected from the excavation pit near Building 51 (sample no. WS 9 #35600) contained 69 ppm total petroleum hydrocarbons. This is not correct. Petroleum hydrocarbons were not detected in this sample, as indicated on Sound Analytical Services lab sheet dated 21 October 1993. The text of the Decommissioning Report states the incorrect 69 ppm value in two places, on the second page of the text

and on the second page of Appendix B. Approximate locations of USTs are shown on Figure 5.

There are currently no aboveground storage tanks (ASTs) at NMCRC. Two ASTs, previously located adjacent to Building 51, were removed from the Navy Property in December 1996 (Severson 1997). The ASTs were associated with the oil/water separator system used to treat oily bilge water from marine vessels (URS 1996). Bilge water was initially pumped into a 1,500 to 2,000 gallon AST and then pumped into the oil/water separator system. Separated oil was stored in a 700-gallon AST and disposed of offsite by a contractor.

During the removal of the ASTs, soil impacted by petroleum hydrocarbons was observed below the ASTs. Approximately 70 tons of petroleum contaminated soil was disposed of offsite in accordance with the Independent Cleanup Program. Soil samples collected in the excavation area after removal of the petroleum contaminated soil indicate that petroleum hydrocarbons were not present in concentrations above Ecology's cleanup levels for total petroleum hydrocarbons.

Prior to 1974 (during the period NMCRC Tacoma was not connected to the City of Tacoma publicly-owned sewage treatment facilities), effluent from the oil/water separator previously adjacent to Building 51 discharged to a septic tank. Effluent from the septic tank was chlorinated and discharged to the Hylebos Waterway. No information documenting the tank closure has been located. However, subsequent to 1974, use of the septic tank was discontinued, and since then, there has been no known source of discharge to the tank which would cause it to contain anything more than water.

The DON and its site assessor have concluded that the tank sites meet the requirements for a No Further Action required determination. The decommissioning and removal of USTs and ASTs, and cleanup of petroleum contaminated soil was conducted by the DON in accordance with Ecology's Independent Cleanup Program. While the DON submitted the UST Decommissioning Reports to Ecology following removal of the tanks in 1993, no official notification of a No Further Action Determination was received from Ecology. When this matter was recently brought to Ecology's attention, the agency stated that the sites will remain on its Confirmed and Suspected Contaminated Sites List until a No Further Action determination is made through Ecology's Voluntary Cleanup Program (Ecology 2009). Ecology further stated that the project proponent or subsequent landowners are encouraged to enter the Voluntary Cleanup Program to obtain technical assistance related to cleanup. For that reason, the deed conveying the Navy Property shall contain a provision noting Ecology's comments and stating that if, in the course of utilizing the Navy Property, the transferee finds it necessary to obtain a No Further Action determination from Ecology for any of the USTs or ASTs sites, transferee may be required to enter into Ecology's Voluntary Cleanup

Program for that purpose. Any required actions taken by the transferee in that respect shall be at the sole cost and expense of the transferee,

3.3.4 Munitions and Explosives of Concern (MEC)

Based on available records and information, no MEC is currently present on the NMCRC Tacoma property.

The term MEC means specific categories of military munitions that may pose unique explosives safety risks and includes: (1) Unexploded Ordnance, as defined in 10 U.S.C. §101(e)(5); (2) Discarded military munitions, as defined in 10 U.S.C. §2710(e)(2); or (3) Munitions constituents, as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

It is noted that the locker room in Building 55 is identified as a rifle range in the 1965 as-built record drawings for the facility. However, drawings from 1984 identify the room as a locker room, which is its current use. No closure documents for the rifle range have been located. However, there is no visual or other evidence that a rifle range ever existed within this space.

3.3.5 Asbestos Containing Material (ACM)

A non-destructive sampling survey for asbestos-containing material (ACM) was performed in March 1992 (AE Group 1992). Based on the age of the buildings, samples were collected from Buildings 51, 55, 56, and 57. Results from the survey indicate that ACM was present in Building 55 (administrative building) and Building 56 (maintenance shops). ACM was found in vinyl floor tile, mastic, pipe and tank insulation, fittings on pipes, and sprayed-on acoustical texture on ceiling in Building 55 and on pipe insulation in Building 56.

ACM was removed from the administrative building (Building 55) and most of the shop facilities (Building 56) in 1994 (URS 1996). Additional ACM was removed in 1998 (DON 2006). All ACM insulating material was removed from piping associated with the USTs at the time of their removal and closure (URS 1996, NWSGC 1993).

In 1995, a below-ground vault was observed southeast of Building 51 that may hold asbestos-containing pipe-insulating material (URS 1996).

The deed will contain a notice that asbestos or ACM have been found and are otherwise presumed to exist in Buildings 51, 55, and 56, and on utilities above and below ground, including in any below-ground vaults. The deed transferring the Navy Property shall also contain a covenant by GRANTEE that it shall comply with all applicable Federal, State and local statutes and regulations in abating, managing and disposing of Asbestos Containing Materials in connection with the utilization and/or