



MATHER AFB CALIFORNIA

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 3231



Mather Air Force Base

Final

Finding of Suitability to Transfer

Parcel G

November 2011

Air Force Real Property Agency

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Acronyms and Abbreviations

ACM	asbestos-containing material
AC&W	Aircraft Control and Warning Site
AF	Air Force
AFB	Air Force Base
AFBCA	Air Force Base Conversion Agency
AFRPA	Air Force Real Property Agency
AOC	Area of Concern
AR	Administrative Record
AST	aboveground storage tank
bgs	below ground surface
CA	State of California
CAL EPA	State of California Environmental Protection Agency
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
CVWB	State of California Central Valley Regional Water Quality Control Board
DAA	Deputy Assistant Administrator
DAS	Deputy Assistant Secretary
DoD	Department of Defense
DMM	discarded military munitions
DSOD	Division of Safety of Dams
DTSC	California Department of Toxic Substances Control
EBS	environmental baseline survey
ECC	Environmental Condition Category
EC-CR	Environmental Compliance-Closure Related
EDC	economic development conveyance
EIR	environmental impact report
ESA	Endangered Species Act
ESD	explanation of significant differences
ERP	Environmental Restoration Program
ESS	explosives safety submission
FAA	Federal Aviation Administration
FEIS	final environmental impact statement
FOSL	finding of suitability to lease
FOST	finding of suitability to transfer
ft	foot/feet
IC	institutional controls
IRCTS	Inactive Rancho Cordova Test Site

IRP	Installation Restoration Program
JP-4	jet propulsion fuel, type 4
kg	kilogram
LBP	lead-based paint
MAFB	Mather Air Force Base
MARS	Military Affiliate Radio Station
Mather	former Mather Air Force Base
MC	munitions constituents
MEC	munitions and explosives of concern
MMRP	Military Munitions Response Program
MRS	munitions response site
NAD	North American Datum
NEPA	National Environmental Policy Act
NFA	no further action
NPDES	National Pollution Discharge Elimination System
OPS	operating properly and successfully
OU	Operable Unit
OWS	oil water separator
PAH	polycyclic aromatic hydrocarbon
PBC	public benefit conveyance
PCB	polychlorinated biphenyl
ppm	parts per million
ROD	record of decision
RSROD	Revised Supplemental Record of Decision
SAC	Strategic Air Command
SCEMD	Sacramento County Environmental Management Department
SEBS	supplemental environmental baseline study
SLUC	state land use covenant
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SROD	supplemental record of decision
SSROD	sixth supplemental record of decision
TACAN	Tactical Air Navigation system
TBD	to be determined
TCE	trichloroethene or trichloroethylene
TSROD	third supplemental record of decision

U.S.	United States
USACE	United States Army Corps of Engineers
USAF	United State Air Force
USEPA	United States Environmental Protection Agency, Region IX
µg/L	micrograms per liter
UST	underground storage tank
UNK	unknown
USFWS	United States Fish and Wildlife Service
UXO	unexploded ordnance
VSI	visual site inspection
WDR	Waste Discharge Requirement
WSA	weapons storage area
WMM	waste military munitions

**FINDING OF SUITABILITY TO TRANSFER (FOST)
MATHER AIR FORCE BASE, CALIFORNIA
PARCEL G
FINAL**

1.0 PURPOSE

1.1 The purpose of this Finding of Suitability to Transfer (FOST) is to document environmentally related factors and the suitability to transfer the real property and improvements on Parcel G (herein referred to as the "Property") at the former Mather Air Force Base (Mather), California (CA) to Sacramento County (herein referred to as the "Transferee"). A description of the subject Property is provided in Section 2. The Property, comprised of 1485 acres, will be transferred in sections by deed through different mechanisms. Approximately 853 acres will transfer via a Parks and Recreation public benefit conveyance (PBC), approximately 500 acres will transfer via an economic development conveyance (EDC), a Parks and Recreation PBC or a conservation conveyance, and approximately 132 acres will transfer via an EDC or a Parks and Recreation PBC. The anticipated use of the Property is for a public park, recreational facilities, a long-range radar facility, habitat conservation, and commercial development. The 1994 Supplemental Record of Decision specifies that, as condition of this transfer, Sacramento County agrees to enter into a long-term, no-cost lease of facilities and land to the Federal Aviation Administration (FAA) to allow the FAA to remain at Mather for the purpose of operating its Long Range Radar Facility.

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

- (1) *Federal Facility Agreement Under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120*, July 1989 (Administrative Record [AR]# 1830)
- (2) *Final Asbestos Survey Report for Mather Air Force Base (AFB)*, September 1990
- (3) *Final Environmental Impact Statement (FEIS), Disposal and Reuse, Mather AFB*, April 1992 (AR# 1831)
- (4) *FEIS Record of Decision (ROD)*, March 1993 (AR# 2164)
- (5) Consultative Letter, Weapons Storage Area Decommissioning Survey, Armstrong Laboratory (Air Force Materiel Command), August 1993
- (6) *Superfund Record of Decision for the Aircraft Control and Warning (AC&W) Site*, December 1993 (AR# 602)
- (7) *Basewide Environmental Baseline Survey (EBS)*, December 1993 (AR# 955)
- (8) United States Environmental Protection Agency (USEPA) letter to Mr. Olsen, Mather AFB Uncontaminated Property Identification, April 18, 1994 (AR# 2529)
- (9) California-EPA (CAL EPA) letter from Mr. Wang to Ms. Anderson, EPA, Mather AFB Uncontaminated Property Identification, April 18, 1994 (AR# 2531)
- (10) *Mather Field General Plan Amendment*, adopted August 1994

- (11) *Mather Field General Plan Amendment Final Environmental Impact Report (EIR), State Clearinghouse No. 93102054, August 1994*
- (12) *Soil and Groundwater Operable Units Additional Field Investigation Remedial Investigation Report, August 1994 (AR# 683, 882, 883.1, 883.2, 884, 885, 886)*
- (13) *Mather Air Force Base Redevelopment Plan Final Subsequent EIR, State Clearinghouse No. 93032006, September 1994*
- (14) *Supplemental Record of Decision (SROD), Final Environmental Impact Statement, Disposal and Reuse of Mather AFB, California, dated 10-16-94 and signed 21 November 1994 (AR# 2165)*
- (15) *Air Force report titled "Lead-Based Paint Survey/Screen", April 1995*
- (16) *Revised Supplemental Record of Decision (RSROD) of the FEIS for the Disposal and Reuse of Mather AFB, September 1995 (AR# 2166)*
- (17) *Superfund Record of Decision for the Soil Operable Unit (OU) Sites and Groundwater Operable Unit Plumes, April 1996 (AR# 799)*
- (18) *Final Comprehensive Baseline Risk Assessment for Mather AFB, October 1996 (AR# 626, 627, 628)*
- (19) *Mather Lake Dam Breach Study, U.S. Army Corps of Engineers, Sacramento District, October 1996*
- (20) *Mather Field Specific Plan Final Subsequent EIR, State Clearinghouse No. 96052108, February 1997*
- (21) *Mather Field Specific Plan, adopted May 7, 1997*
- (22) *Explanation of Significant Difference (ESD) to the AC&W OU ROD, Discharge of Treated Groundwater to Mather Lake, June 1997 (AR# 1319)*
- (23) *Mather Field Special Planning Area Ordinance, adopted June 11, 1997*
- (24) *Third Supplemental Record of Decision (TSROD) of the FEIS for the Disposal and Reuse of Mather AFB, May 1998 (AR# 2167)*
- (25) *CERCLA ROD, Basewide Operable Unit Sites, August 1998 (AR# 1135)*
- (26) *AC&W Site Groundwater Pump and Treat System Report of Proper and Successful Operation of the AC&W Remediation System, September 1998 (AR# 1767)*
- (27) *USEPA approval letter of Operating Properly and Successfully (AC&W Remediation System), November 1998 (AR# 1169)*
- (28) *Final Ordnance and Explosives Characterization Report of Suspected Buried Ordnance at the Weapons Storage Area, April 1999 (AR# 2517)*
- (29) *Central Valley Regional Water Quality Control Board letter, Closure Letter for Site 48 (Building 10410) Former Underground Storage Tank, January 2002 (AR# 2032)*
- (30) *Delineation of Potential Jurisdictional Wetlands and Waters of the United States(U.S.) for the Mather Field Study Area in Rancho Cordova, February 2004*
- (31) *Revised Draft Mather Airport Master Plan, February 2004*
- (32) *Mather Field Natural Resources Assessment, Phases I and II, Wetlands Research Associates, Inc., May 2004*
- (33) *CERCLA Second Five-Year Review of Mather AFB Remedial Actions, September 2004 (AR# 2157)*
- (34) *CERCLA ROD, Supplemental Basewide Operable Unit Sites, September 2006 (AR# 2646)*
- (35) *Closure of Military Munitions Response Program (MMRP) Site XE402, UXO Burial Site at Mather Air Force Base, California, July 2007 (AR# 2707)*

- (36) *Department of Toxic Substances Control (DTSC) Proposes Groundwater Cleanup at the Inactive Rancho Cordova Test Site, DTSC Fact Sheet-October 2007*
- (37) *Explanation of Significant Difference (ESD), Institutional Controls for Groundwater Remedy, Site WP-12, Aircraft Control and Warning Site, Mather, California, November 2008 (AR# 2728)*
- (38) *Letter Report for Basewide Well and System Decommissioning at the Former Mather Air Force Base, July 2009*
- (39) *Final Remedial Action Report for Installation Restoration Program (IRP) Site OT-87, Rod and Gun Club Skeet and Trap Range, Air Force Real Property Agency (AFRPA), September 2009 (AR# 2745)*
- (40) *Annual and Fourth Quarter 2010 Mather Groundwater Monitoring Report, November 2011 (AR #3103)*
- (41) *Final 2011 Groundwater Monitoring Program Sampling Plan for the Former Mather AFB, April 2011 (AR # 3064)*
- (42) *Final Results of 2009 Small Mammal Monitoring at Site 87, former Mather Air Force Base, Sacramento County, California, September 2010 (AR# 2969)*
- (43) *Final Munitions Response Completion Report for Site AOC 597, Mather Lake Practice Grenade Training Area, October 2010 (AR# 2982)*
- (44) *Final Explanation of Significant Difference from the Record of Decision for Basewide Operable Unit Sites, former Mather AFB, signed August 25, 2010 (AR# 2972)*
- (45) *Third Five-Year Review for the Mather Air Force Base, October 2010 (AR# 3039)*
- (46) *2009 Annual Groundwater Monitoring Report, Inactive Rancho Cordova Test Site, April 30, 2010, prepared by Montgomery and Associates for The Boeing Company and Aerojet-General Corporation; found online at:
http://geotracker.waterboards.ca.gov/esi/uploads/geo_report/2665399134/SL205493018.PDF*
- (47) *Annual and Fourth Quarter 2009 Mather Groundwater Monitoring Report, for the former Mather Air Force Base (Mather), California, October 2010 (AR# 2970, 2970.1)*
- (48) *Final Explanation of Significant Difference from the Record of Decision for Basewide Operable Unit Sites, former Mather AFB, June 2010 (AR# 2972)*
- (49) *Sixth Supplemental Record of Decision (SSROD) of the FEIS for the Disposal and Reuse of Mather AFB, July 2010*
- (50) *Supplemental Basewide Environmental Baseline Survey, Parcel G, November 2011, which includes documentation of the Visual Site Inspection conducted in 2011*
- (51) *U.S. EPA concurrence letter of 5 Nov 2009, "Final Remedial Action Report for Site OT-87, Rod and Gun Club Skeet and TrapRange, Mather, California, dated September 2009 " (AR# 2752)*
- (52) *AFRPA memorandum, "Submittal of Approved No Further Action (NFA) Explosives Safety Submission (ESS) for AOC 597, Mather Lake Practice Grenade Range, January 2011, Former Mather Air Force Base, California" (AR# 3052)*
- (53) *Draft Biological Opinion For Disposal Of The Former Mather Air Force Base, Sacramento County, California, January 2010 (U.S. Fish And Wildlife Service file number 81420-2008-TA-1567-1)*
- (54) *Second Quarter 2011 Mather Groundwater Monitoring Program Fact Sheet, August 2011 (AR# 3089)*

(55) Letter 20 October 2011 DDESB Approval of Finding of Suitability to Transfer Parcel G, Former Mather Air Force Base, Sacramento County, CA (AR#3119)

Note: AR documents are located on the following website address:

<https://afarpaar.lackland.af.mil/ar/>

Air Force documents not found in the AR may be viewed at the AFRPA Office at:

3411 Olson Street, McClellan, California

Telephone Number: (916) 643-1250

2.0 PROPERTY DESCRIPTION

The Property is shown on the map in Attachment 1, Figure 1, and is comprised of approximately 1,485 acres and 42 facilities. The Property also includes Mather Lake and associated recreational area, the AC&W area, the Weapons Storage Area (WSA), and the large tract of open space between these areas. The Property includes the improvements listed in Table 2.0.

As specified in the Supplemental and Revised Supplemental Records of Decision (SROD and RSROD), the area to be leased to the FAA will be sufficient to support its operation requirements and include: access to all FAA owned property (FPS-91A tower, emergency power generator building), and storage trailer; Air Force (AF) facilities 10120 (concrete pad under tower) and 10390 (maintenance and administrative building); and the reservation of a 1,500 foot radius easement clear zone; and any other conditions necessary to ensure adequate radar coverage. In addition, Air Force facilities 10150 and 10155 are located within this area and would probably be included in the lease. This area is depicted on Attachment 1, Figure 1. The County entered into a long-term no-cost lease with the FAA in December 2009.

Table 2.0
Property Inventory Description

Facility	Description (Former AF Use)	Year of Construction
9000	Sewer Lift Station	1982
10100	Military Affiliate Radio Station (MARS)	1951
10110	Electrical Generator Station	1960
10120	FAA Long-range Radar Pad	1960
10150	FAA Shop	1951
10155	FAA Storage	1976
10210	Recreation Support	Unknown

Facility	Description (Former AF Use)	Year of Construction
10300	Administration	1951
10320	Rod and Gun Club	1953
10360	Office	1962
10390	FAA Office	1985
10400	Training Office	1951
10401	Electric Generator Station	1978
10410	Office	1960
10450	Administration	1951
10530	Office	1954
10550	NavAid Shop	1951
18000	Shaded Pad	Unknown
18001	Storage Shed	1979
18002	Dog Kennel Office	1961
18003	Dog Kennel	1961
18004	Sewage Pumping Station	1980
18005	Water Well	1958
18010	Munitions Maintenance Office	1958
18011	Electrical Generator Station	1980
18015	Munitions Inspection	1958
18018	Missile Assembly	1975
18020	Entry Control Office	1958
18025	Storage Igloo	1958
18030	Storage Igloo	1958
18035	Storage Igloo	1958
18040	Storage Igloo	1958
18042	Storage Igloo	1975
18044	Storage Igloo	1975
18046	Storage Igloo	1975

Facility	Description (Former AF Use)	Year of Construction
18050	Storage Igloo	1958
18051	Fire Team Facility	1980
18060	Munitions Storage	1958
18070	Munitions Shop	1958
18080	Explosives Facility	1966
18090	Explosives Facility	1966
18092	Security Control Tower	1978

3.0 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts caused by the proposal to dispose and reuse the Property have been adequately identified, analyzed, and disclosed in compliance with NEPA. These impacts were first identified and analyzed in the April 1992 Final Environmental Impact Statement (FEIS) for the Disposal and Reuse of Mather AFB. The 1993 ROD and 1994 SROD discussed the environmental impacts and associated mitigation measures. The Air Force did not find that any of the environmental impacts identified and analyzed in the FEIS were significant. The Air Force decided to proceed with the disposal and reuse decisions as documented in the ROD. Subsequent supplemental RODs have added, or slightly modified disposal decisions and in some cases changed the conveyance mechanism.

4.0 ENVIRONMENTAL CONDITION OF THE PROPERTY

Based on a review of the Basewide Environmental Baseline Survey (EBS), the 2011 Supplemental Environmental Baseline Survey (SEBS), and most recent Visual Site Inspection (VSI), the Property is considered Department of Defense (DoD) Environmental Condition Category (ECC) 4, "areas where release, disposal, and/or migration of any hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken."

This is the overall ECC Category; however, there are other areas within the boundaries of the Property that reflect ECC categories 1 or 2.

For reference, DoD property categories are defined as follows:

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred, including any migration of these substances from adjacent areas.

Category 2: Areas where only release or disposal of petroleum products has occurred.

Category 3: Areas where release, disposal, and/or migration of hazardous substances have occurred but at concentrations that do not require a removal or remedial response.

Category 4: Areas where release, disposal, and/or migration of hazardous substances have occurred and all removal or remedial actions to protect human health and the environment have been taken.

Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred and removal or remedial actions are underway, but all required actions have not yet been implemented.

Category 6: Areas where release, disposal, and/or migration of hazardous substances have occurred, but required actions have not yet been implemented.

Category 7: Areas that are not evaluated or require additional evaluation.

The Property was originally categorized in the EBS as DoD ECC 1, 2¹, 4, 6 and 7. A portion of Parcel G was designated ECC 6 and 7 in the 1993 EBS based on the unknown extent of contamination associated with Installation Restoration Program (IRP) Site WP-12 (also known as AC&W Site Plume) and other IRP sites. With the exception of WP-12 and OT-87 (Skeet and Trap Range), all IRP sites have been determined to require no further action by CERCLA RODs for Mather. The Property's condition has changed from the condition identified in the original EBS and is now an overall ECC 4.

Site WP-12 is located in the AC&W area and is the source for a trichloroethene (TCE) contaminated groundwater plume. The TCE plume is currently being remediated under CERCLA, and is subject to a FFA among the U.S. Air Force, U.S. Environmental Protection Agency (USEPA) Region IX, and the State of California, represented by the DTSC. The remedy selected for Site WP-12 in the AC&W ROD was groundwater extraction and treatment with discharge of the treated water by injection back into groundwater. The groundwater extraction, treatment (air stripping) and injection remedial action was initiated in 1995 and is ongoing. In order to alleviate extraction limitations caused by injection well capacities, the AC&W ROD was modified by a 1997 Explanation of Significant Difference (ESD) authorizing discharge of the treated water to Mather Lake. The remedial action for the AC&W Plume was determined to be operating properly and successfully in 1998. Another ESD, completed in 2008, added institutional controls (ICs) to the AC&W Plume remedy to restrict groundwater use and protect

¹ DoD ECC 2 definition based on the 1993 Basewide EBS was "areas where only storage of hazardous substances or petroleum products has occurred but no release, disposal, or migration from adjacent areas has occurred", which is the equivalent today of ECC 1.

the remedy components. The AC&W Plume is subject to ongoing remediation and ICs until the TCE concentration in groundwater throughout the AC&W site has been reduced to the aquifer cleanup level of 5 micrograms per liter ($\mu\text{g/L}$).

Site OT-87 is the site of a former skeet and trap range that contained lead shot and soil impacted by metals and polynuclear aromatic hydrocarbons (PAHs). Remediation by excavation and treatment was completed in accordance with the Basewide Operable Unit ROD, to a standard compatible for the planned recreational use. Based on the ROD and the 2010 Basewide Operable Unit ESD, Site OT-87 is subject to ICs due to lead in soil, some of which exceeds the concentration range allowing for unrestricted use. The Site OT-87 ICs, described in more detail in Section 5.2, restrict soil disturbance activities and limit use of the Property. Additionally, three years of confirmatory small mammal monitoring required by the ROD was conducted as required in the ROD to evaluate whether the cleanup level is protective of animal life. The *Final Results of Small Mammal Monitoring at Site 87* report, submitted in October 2010 for the third year of monitoring, recommends that the monitoring be discontinued. As of November 2011, there has been no regulatory concurrence with the recommendation to discontinue monitoring. Rights of access will be retained in the deed to accomplish any additional monitoring or remedial action that may be warranted.

All of the other IRP sites within the Property have been closed with the exception of Site ST-48 (a former tank site). The tank and associated pipelines at ST048 were removed and the associated contaminated soil excavated. ST-48 will receive regulatory approval of the recommended closure after the Central Valley Regional Water Quality Control Board (CVWB) has evaluated documentation of a nearby cleanup required completed by the Air Force in 2011 to address petroleum hydrocarbon contamination associated with former aboveground storage tanks serving the same building as the former UST at ST-48.

In addition to the IRP sites, there is an area of concern in Parcel G identified under the Military Munitions Response Program. AOC-597 consists of a portion of Mather Lake which was reportedly used for practice grenade training. The accessible shoreline was cleared and no munitions related to this training were found. However, as the training occurred in the dry lake bed which is normally submerged, notifications and land-use restrictions are required as described in Section 5.5.

Additionally, a perchlorate- and TCE-contaminated groundwater plume, originating from an off-base source (the Inactive Rancho Cordova Test Site [IRCTS]), has been detected in the Laguna Formation in the northern area of the Property west of Mather Lake. The parties responsible for the IRCTS perchlorate/TCE contamination have installed groundwater monitoring wells and groundwater extraction wells, including some within the Property, to remediate the contaminated groundwater plume. The IRCTS project has one extraction well

with associated power, communications, and conveyance pipelines, and four monitoring wells, on the Property. Well identification and survey coordinates are listed in Table 5.2.

5.0 DEED RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Section 1.2 were evaluated to identify environmental factors listed in Attachment 2 that may warrant constraints on certain activities in order to minimize or eliminate risks to human health or the environment. Such constraints are typically embodied as permanent or temporary restrictions in the Deeds or as specific notifications to the Transferee. These restrictions or notifications may constitute or implement mitigations required by the Disposal and Reuse ROD or Supplemental RODs. The factors that require either deed restrictions or specific notifications are identified in Attachment 2 and are discussed below.

The Air Force has determined that the remaining factors listed in Attachment 2 do not pose an unacceptable threat to human health or the environment, consistent with governing regulatory processes, and, therefore, do not require deed restrictions or notifications to the Transferee and thus are not discussed below.

5.1 Hazardous Substances Notification

Consistent with the provisions of CERCLA § 120(h)(3), which requires that whenever federal property on which hazardous substances were stored for one (1) year or more, released or disposed of is conveyed by deed, each deed entered into for the conveyance of such property will include a notice of the type and quantity of such hazardous substances and of the time at which such storage, release or disposal took place. This notice requirement was codified at 40 Code of Federal Regulations (CFR) Part 373 which provides that the notice requirement applies only when hazardous substances are or have been stored for one (1) year or more in quantities greater than or equal to: (1) 1,000 kilograms or the hazardous substance's CERCLA reportable quantity as described in 40 CFR Part 302.4, whichever is greater (40 CFR Part 373.2(b)); or (2) 1 kilogram if the substance is an acutely hazardous substance found in 40 CFR Part 261.30 (40 CFR Part 373.2(b)). Additionally, this regulation also provides that the notice required for the known release of hazardous substances applies only when the hazardous substances are or have been released in quantities greater than or equal to the substance's CERCLA reportable quantity found in 40 CFR Part 302.4.

No hazardous substances in quantities greater than or equal to 1000 kilograms (one [1] kilogram if an acutely hazardous waste) or the hazardous substance's CERCLA reportable

quantity were stored on the Property for one (1) year or more. Therefore, no "Notice of Hazardous Substance Stored/Disposed" is required with this FOST. A list of all hazardous substances known to be stored on the Property is included in the Basewide EBS, Appendix C.

Portions of the Property once contained some level of hazardous substance contamination. As noted below in Section 5.2, *Environmental Restoration Program: Installation Restoration Program (IRP) sites, Environmental Compliance-Closure Related (EC-CR) sites, and Areas of Concern (AOC)*, hazardous substance releases to the soil and/or groundwater are known to have occurred. Because no documentation associated with these releases could be found, the date and quantity of release(s) are unknown, nor is it known whether the releases were in quantities greater than or equal to the substance's CERCLA reportable quantity found at 40 CFR Part 302.4. Since a release occurred, consistent with CERCLA requirement for notification of hazardous substance releases, a Notice of Hazardous Substance Released, to the extent such information is available, is provided in Attachment 4. Additionally, a hazardous substance notice, based on available information, will be given in the Deed.

5.2 Environmental Restoration Program: Installation Restoration Program Sites, Environmental Compliance-Closure Related Sites

The Environmental Restoration Program includes management of both the Installation Restoration Program (IRP), and the Environmental Compliance-Closure Related (EC-CR) Sites.

IRP Sites: There are fifteen IRP sites located on Parcel G: WP-12 (AC&W Site), WP-17 (Septic Tank), SD-80 (Drainage Ditch), OT-87 (Skeet and Trap Range), and DD-88 (Drainage Ditch) are regulated under CERCLA, and petroleum sites ST-25, ST-30, ST-43, ST-47, ST-48, ST-49, ST-52, ST-53, ST-75, and ST-76 are fall under other regulations. A map of IRP sites located on the Property is included in Attachment 1, Figure 2. The IRP sites that are not petroleum-related are listed in Table 5.2a. The petroleum-related sites are listed in Table 5.4a and Table 5.4b. All of the petroleum sites listed above received closure in a CERCLA ROD. These petroleum sites were managed under the IRP, and also fall under the Environmental Compliance-Closure Related (EC-CR) category. The EC-CR program also includes other petroleum sites and the former location of ASTs 10402 and 10403, which are described in Section 5.4.

Closed IRP Sites: WP-17 was approved for no further action in the Basewide Operable Unit (OU) ROD dated August 1998. IRP Sites SD-80 and DD-88 were determined to require no further action by the Supplemental Basewide OU Sites ROD, dated September 2006. Site OT-87, was addressed by excavation and treatment of soil impacted by metals and PAHs in accordance with the Basewide OU ROD. The Basewide OU ROD and the 2010 Basewide Operable Unit ESD selected ICs as part of the remedy for Site OT-87 due to lead in soil that is

compatible with the planned recreational use but is not acceptable for unrestricted use. The Site OT-87 ICs restrict soil disturbance activities and limit use of the Property.

IRP Sites with Ongoing Remediation: IRP Site WP-12, the AC&W TCE-contaminated groundwater plume, is located under the northwestern portion of the Property, specifically under the AC&W area. The AC&W plume originates from Site WP-12, the AC&W Disposal Site. Depth to groundwater in the area of the AC&W Plume is approximately 125 - 135 feet below ground surface (bgs) and groundwater flows in a southwesterly direction.

The remedy selected in the AC&W ROD, December 1993, was groundwater extraction and treatment with discharge of the treated water by injection back into groundwater. The groundwater extraction, treatment (air stripping) and injection remedial action was initiated in 1995. The AC&W ROD was modified by a 1997 ESD authorizing discharge of the treated water to Mather Lake in order to alleviate extraction constraints caused by limited injection well capacities. The CVWB adopted Waste Discharge Requirements (WDRs) for the AC&W Groundwater Treatment System as Renewal Order No. R5-2002-0212, adopted 6 December 2002, which superseded the prior Order No. 96-258 adopted 20 September 1996. In regard to the WDRs, the AC&W Groundwater Treatment System complies with substantive National Pollution Discharge Elimination System (NPDES) requirements, as specified in the *Final Explanation of Significant Difference for the AC&W Operable Unit Record of Decision*, but is exempt from obtaining permits in accordance with Section 121 of CERCLA. Second Quarter 2011 monitoring data indicates a maximum detection of 19 µg/L TCE at well ACW AT-1.

Based on the 2010 Five-Year Review and recent monitoring data, the remedy is effective and the portion of the plume with groundwater contamination greater than the aquifer cleanup level has decreased in size. All remedial actions to protect human health and the environment in accordance with CERCLA § 120 (h)(3) have been taken. The *AC&W Site Groundwater Pump and Treat System Report of Proper and Successful Operation* received USEPA concurrence on November 25, 1998 indicating that the remedial action at WP-12 is operating properly and successfully in accordance with the AC&W ROD and the 1997 ESD for Discharge of Treated Groundwater to Mather Lake. The layout of the AC&W extraction, treatment, monitoring, and discharge system is shown in Figure 4-1 of the Annual and Fourth Quarter 2010 Mather Groundwater Monitoring Report, and well locations are listed in Table 5.2 below.

The USEPA and the State of California identified concerns about the long-term protectiveness of the AC&W remedy, based on the lack of ICs in the 1993 ROD and the 1997 ESD. Another ESD was completed in November 2008 to establish ICs in the form of groundwater use restrictions as a component of the AC&W groundwater remedial action until the cleanup level of 5 µg/L TCE in the aquifer is met. The ICs prohibit installation of groundwater wells for purposes other than remediation and monitoring, prohibit interference with the remedy components, and maintain rights of access for the Air Force and regulatory

agencies for the purpose of environmental cleanup. The portion of Parcel G subject to these ICs is shown in Attachment 1, Figure 4.

Table 5.2a
IRP Sites (Excluding Petroleum Sites)

Site and Operable Unit	Remedy and Site Status	Institutional Controls?	Decision Documents Ref#/(AR#)
WP-12, OU-1	Groundwater pump and treat operating properly and successfully	Y (AR#2728)	6 (602) 22 (1319) 37 (2728)
WP-17, OU-5	No Further Action per OU-5 ROD	N	25 (1135)
SD-80, OU-6	No Further Action per OU-6 ROD	N	34 (2646)
OT-87, OU-5	Lead and PAHs cleaned to non-residential standard; land-use restrictions remain	Y (AR#2972)	25 (1135) 44 (2972)
DD-88, OU-6	No Further Action per OU-6 ROD	N	34 (2646)

Ref# and AR# are the reference and Administrative Record numbers listed in Section 1.2

AR = OU-1 = Aircraft Control and Warning Operable Unit
OU-5 = Basewide Operable Unit

OU-6 = Supplemental Basewide Operable Unit

Groundwater Remediation Program Wells: Thirty-eight (38) Air-Force-owned groundwater production, extraction, injection, or monitoring wells are currently located on the Property. Ownership of the inactive K-9 production well will be transferred with the Property. Well identification and survey coordinates are listed in Table 5.2b below. The locations of groundwater monitoring and extraction wells located within the Property are shown on the map in Attachment 5 of the SEBS.

Table 5.2b
Groundwater Wells located on the Property*

Well ID	Northing	Easting	Well ID	Northing	Easting
Wells owned by the Air Force					
ACW AT-1	1964377	6770398	MAFB-070	1963092	6769867
ACW AT-2	1963880	6769780	MAFB-071	1963720	6769299
ACW AT-3	1963130	6769881	MAFB-072	1964158	6768916
ACW AT-4	1962667	6768812	MAFB-078	1962636	6768828
ACW EW-1	1963539	6769706	MAFB-080	1961901	6769128
ACW EW-2	1963065	6769205	MAFB-082	1963246	6770511
ACW PZ-07	1962830	6769222	MAFB-193	1963500	6768722

Well ID	Northing	Easting	Well ID	Northing	Easting
ACW PZ-07C	1962830	6769221.54	MAFB-194	1962628	6768776
ACW PZ-08	1963389.28	6769741.24	MAFB-195	1961930	6769066
ACW PZ-08C	1963389.28	6769741.24	MAFB-196	1963820	6770110
ACW PZ-09	1964068.91	6769750.46	MAFB-401	1964588.31	6770863
ACW PZ-09C	1964068.91	6769750.46	MAFB-402	1964236.09	6770751
ACW PZ-10	1964508.66	6770404.94	MAFB-403	1964032.55	6770715
ACW PZ-10C	1964508.66	6770404.94	MAFB-408	1964872	6771083
MAFB-053	1963688	6769305	MAFB-432	1962648.85	6768768.51
MAFB-054	1964128	6768928	MAFB-453	1964129.1	6770040.3
MAFB-067	1964100	6770514	MAFB-453C	1964129.2	6770039.8
MAFB-068	1964360	6770438	MAFB-454	1963405	6769319
MAFB-069	1964376	6770928	K-9	1959394	6773704
IRCTS Wells (not owned by Air Force)					
Well ID	Northing	Easting	Well ID	Northing	Easting
EX-2	1964971.680	6771385.214	STSW-170	1965214.737	6771368.899
STSW-159	1966387.010	6772481.329	STSW-173	1965508.846	6772861.363
STSW-164	1966387.172	6772466.747			

* - State Plane coordinates, North American Datum (NAD) 83

IRCTS Plume: In addition to the groundwater contamination plume originating at Mather, an additional groundwater contamination plume originating off-site, and containing perchlorate and TCE, has migrated under portions of Mather including the Property. The plume originating off site has one or more sources at the Inactive Rancho Cordova Test Site (IRCTS). A groundwater extraction system owned and operated by the responsible parties for the contaminant plume includes an extraction well (EX-2) and four monitoring wells (labeled with the prefix STSW for Sacramento Test Site Well) on the Property (listed in Table 5.2). STSW-170A (in the A-horizon screen interval only) had the highest concentrations of these wells on the Property, with 627 µg/L perchlorate and 5 µg/L TCE. However, a 2011 sample reported no detection of perchlorate or TCE at this well screen (per Alex MacDonald, CVWB). Perchlorate concentrations within the plume areas under portions of the Property in 2009 exceeded the California MCL of 6 µg/L for perchlorate. The plume interpretation as of 2009 is shown in Attachment 1, Figure 5. The remediation and monitoring of this perchlorate/TCE contamination is the responsibility of other parties under regulatory authority of the DTSC and the CVWB.

Land-use Restrictions for ECR Sites: Based on the presence of known groundwater contaminant plumes, the Property is subject to the Consultation Zone requirements of Sacramento County Code, Title 6, Section 6.28.000 (G). Any application for a well permit within 2000 feet of a known groundwater contaminant plume is subject to special review by appropriate regulatory agencies, including, but not limited to the Sacramento County Environmental Management Department (SCEMD) and the CVWB to evaluate potential impacts to public health and groundwater quality.

Covenants will be included in the Deed to protect the Air Force wells and any associated infrastructure on the Property from destruction or disturbance. Ownership of the wells and associated infrastructure, except for the K-9 well, shall be retained by the Air Force, and the Air Force shall retain the right (for itself and regulatory agencies) to access the wells and other equipment for gauging, sampling, repair, maintenance, or decommissioning.

Covenants will be included in the Deed to ensure that environmental investigations and remedial activities will not be disrupted at any time. The Deed will contain a covenant prohibiting installation of wells for purposes other than groundwater remediation or monitoring.

Covenants will be included in the Deed or other related property transfer documents to ensure that any response or corrective actions that are the responsibility of the Air Force for hazardous substances released or disposed of on the subject property prior to the date of the Deed, which are found to be necessary after the date of delivery of the Deed, will be conducted by the United States. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the Transferee that is inconsistent with any use restrictions or covenants contained in the Deed or other related property transfer documents.

The Basewide OU ROD (1998) and the 2010 Basewide OU ROD ESD selected ICs in the form of deed restrictions as part of the remedy for Site OT-87. The 2008 ESD for the AC&W OU ROD established ICs for the Site WP-12 groundwater remedy. The ICs for Sites OT-87 and WP-12 include land use restrictions that will be incorporated in the Deed as grantee covenants and in a State Land Use Covenant (SLUC). The portion of Parcel G subject to these restrictions is shown in Attachment I, Figure 4. The SLUC will be signed and recorded within 10 days of deed transfer. These restrictive covenants are required at the time of property transfer and may be modified or removed as a result of a CERCLA ROD or a post-ROD change and, in the case of WP-12, completion of the selected remedial action. Additional restrictions related to MMRP area of concern AOC-597 are discussed in Section 5.5.

With respect to lead in soil at Site OT-87 the following restrictive covenants, described in the 2010 Basewide OU ROD ESD, will be included in the Deed in substantially the following

language. Note that the reference to Figure 5 is to the figure in the ESD. The IC boundary established for Site OT-87 is shown in Attachment 1 to this FOST, Figure 4.

- *Residential Development:* Grantee covenants for itself and its successors and assigns that it will not use, or allow others to use the designated Site 89 area for residential purposes (including mobile or modular homes), hospitals for human care, public or private schools for persons under 18 years of age, nursery schools, or for day care centers for children, and that any uses of the site that would allow exposure to the buried contaminated soils by the public will be prohibited.
- *Disturbance of Soil:* Grantee covenants for itself and its successors and assigns that it will not disturb or allow others to disturb the soil where it may contain elevated lead concentrations (Figure 5), until and unless it is demonstrated that lead concentrations in the soil at this site are no longer a threat to human health and the environment, and without first obtaining written approval from the Air Force, USEPA, and the State, to ensure that the activity will not compromise protection of human health and the environment. This includes any activities that would alter drainage, or sub-drainage in the area.

With respect to the Site WP-12 TCE-contaminated groundwater plume, the following restrictive covenants, described in the AC&W ROD ESD for ICs, will be included in the Deed in substantially the following language:

- Grantee covenants for itself, its successors and assigns that it will not install wells or extract groundwater from the Property for any purpose other than remediation or monitoring, unless specifically approved by the Air Force, USEPA, and the State of California;
- Grantee covenants for itself, its successors and assigns that it will not cause alteration of groundwater conditions beneath the Property through activities such as construction or creation of any groundwater recharge area, unlined surface impoundments, or disposal trenches, unless specifically approved by the Air Force, USEPA, and the State of California;
- Grantee covenants for itself, its successors and assigns not to disturb, destroy, tamper with or alter the groundwater remedial equipment or systems, including but not limited to the components identified in Exhibit [Figure 2 of 2008 AC&W OU ESD or equivalent figure depicting all remedial equipment, systems, and infrastructure within the area to be transferred by deed], or

impede or impair the groundwater remediation activities without the written approval of the Air Force, USEPA, and the State of California;

- Grantee covenants for itself, its successors and assigns to prohibit any activities that would limit access to, or interfere with, the groundwater remedial equipment or systems, including but not limited to the components identified in Exhibit [a figure depicting all remedial equipment, systems, and infrastructure within the area to be transferred by deed] without the written approval of the Air Force, USEPA, and the State of California.

The Deed or other related property transfer documents will reserve a perpetual and assignable non-exclusive easement to allow continued access for the Air Force (or its designated contactor) to monitor the effectiveness of cleanup actions, perform CERCLA five-year reviews, and/or take such additional response or corrective action found to be necessary or where such access is necessary to carry out a response or corrective action on adjoining property.

For any deed (non-Federal entity) or letter of transfer (Federal entity) transferring all or any part of the Property, access for the U.S. Air Force and USEPA will be maintained by substantially the following language incorporated in the Deed:

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

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

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

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

For any deed (non-Federal entity) or letter of transfer (Federal entity) transferring all or any part of the Property, access for State of California regulatory agencies to monitor the effectiveness of cleanup actions and perform CERCLA five-year reviews will be maintained by substantially the following language incorporated in the Deed:

State Access to Property. The right of access reserved to the United States in subparagraph [insert reference to three preceding paragraphs] above may be exercised by agencies of the United States, including, but not necessarily limited to the USAF and the USEPA Region IX. Further, notice is hereby given that the USEPA Region IX, the USAF, and the State of California have entered into an agreement commonly referred to as a Federal Facility Agreement (FFA); that, pursuant to the FFA, the USAF has a continuing duty to provide access to the property to the State of California; and that, the USAF will extend to the State of California, as necessary, the right to use the access reserved in subparagraph [insert reference to three preceding paragraphs] above. This right of access is for purposes, either on the Property or on adjoining lands, consistent with the Installation Restoration Program of the Grantor or the FFA, if applicable.

In addition, the Air Force will place a notification in its deed(s) to alert the property recipient of the perchlorate plume related to the Inactive Rancho Cordova Test Site that extends beneath the property and the need to comply with the Consultation Zone Requirements in the Sacramento County Well Ordinance. Actual compliance with the requirements of the well ordinance is the responsibility of the property owner.

5.3 Petroleum Products and Derivatives

Petroleum products as described in Section 5.4 were stored on the Property in aboveground and underground storage tanks (ASTs and USTs). Some releases occurred through leaks or spills. As indicated in Section 5.4, petroleum-contaminated soil associated with former ASTs at Site ST-048 is being addressed under the regulatory authority of the CVWB.

5.4 Underground/Aboveground Storage Tanks (USTs/ASTs)

Table 5.4a lists the 18 USTs that were located within the Property. All of these tanks have been removed and have received regulatory closure except for the former UST site at Facility 10410 (ST-48). Pursuant to the regulatory authority of the CVWB, additional remedial action to address diesel fuel soil contamination associated with two adjacent ASTs (Facilities 10402 and 10403) is required. The two ASTs have been removed and remediation is in progress as of June 2011 so that site closure can be approved by CVWB.

Table 5.4b lists the 11 ASTs that are, or were, located within the Property. Five of these have been removed, one is currently being used by the FAA, and the rest are inactive.

The Transferee will be responsible for complying with all applicable federal, state, and local laws and regulations relating to the use of these tanks. The Transferee will also assume all liability for any leaks associated with these tanks after the date of transfer as a condition of receiving these tanks in lieu of their removal.

**Table 5.4a
List of Former USTs Located on Parcel G**

Facility Number	Former Contents	Tank Capacity (gallons)	Site, Releases, and/or Spill Number	Tank Status	Tank Closure Date
10100	Diesel	550	ST-25	Removed	No Further Action site in AC&W ROD, December 1993; CVWB closure letter, 11/7/2001.
10120	Diesel	2,000	None noted	Removed by FAA	SCEMD closure letter, 8/9/1994.
10150A	Gasoline	120	ST-43	Removed	No Further Action site in Soil Operable Unit Sites and

Facility Number	Former Contents	Tank Capacity (gallons)	Site, Releases, and/or Spill Number	Tank Status	Tank Closure Date
					Groundwater Operable Unit Plumes ROD, signed June 1996; also closed by SCEMD closure letter dated 01/22/91. The California Water Resources Control Board GeoTracker database lists Facility 10150A as closed 1/22/91 (Site T0606769160).
10150B	Gasoline	50	ST-43	Removed	No Further Action site in Soil Operable Unit Sites and Groundwater Operable Unit Plumes ROD, signed June 1996; also closed by SCEMD closure letter dated 10/08/96. The California Water Resources Control Board GeoTracker database lists Facility 10150A as closed 10/8/1996 (Site T0606730743).
10300	Diesel	8,000	ST-30	Removed	No Further Action site in AC&W ROD, December 1993; CVWB closure letter, 11/7/2001.
10400A	Diesel	4,000	ST-52	Removed	No Further Action site as approved in the Soil and Groundwater OU ROD, 1996; also closed by SCEMD closure letter dated 6/27/96. The California Water Resources Control Board GeoTracker database lists Facility 10400A as closed 6/27/1996 (Site T0606793130).
10400B	Gasoline	4,000	ST-47	Removed	No Further Action site as approved in the AC&W OU ROD, December 1993; also closed by SCEMD closure letter dated 10/08/96 (copy unavailable). The California Water Resources

Facility Number	Former Contents	Tank Capacity (gallons)	Site, Releases, and/or Spill Number	Tank Status	Tank Closure Date
					Control Board GeoTracker database lists Facility 10400B as closed 10/8/1996 (Site T0606745671).
10410	Lube Oil	1,000	ST-48	Removed	No Further Action site in Soil Operable Unit Sites and Groundwater Operable Unit Plumes ROD, signed June 1996 ; however, as stated in a letter dated January 3, 2002, closure is pending resolution of AST (Facilities 10402 and 10403) cleanup action and approval by the CVWB.
10450	Diesel	8,500	ST-49	Removed	No Further Action site in Soil Operable Unit Sites and Groundwater Operable Unit Plumes ROD, signed June 1996; CVWB closure letter, 11/7/2001.
10550A	Diesel	550		Removed	CVWB closure letter, 11/7/2001.
10550B	Diesel	1,460		Removed	CVWB closure letter, 11/7/2001.
18010	Diesel	5,000		Removed	Closed by SCEMD letter dated 8/24/88; the California Water Resources Control Board GeoTracker database lists Facility 18010 as closed 8/24/1988 (Site T0606794390).
18011	Diesel	1,000		Removed	SCEMD closure letter, 6/27/1996.
18015A	Diesel	550		Removed	CVWB closure letter, 2/26/2002.
18015B	Diesel	1,500		Removed	CVWB closure letter, 2/26/2002.
18018	Diesel	6,000	ST-75	Removed	No Further Action site in Soil Operable Unit Sites and Groundwater Operable Unit Plumes ROD, signed June 1996;

Facility Number	Former Contents	Tank Capacity (gallons)	Site, Releases, and/or Spill Number	Tank Status	Tank Closure Date
					SCEMD closure letter, 6/27/1996.
18020	Diesel	750	ST-76	Removed	No Further Action site in Soil Operable Unit Sites and Groundwater Operable Unit Plumes ROD, signed June 1996.
18051	Diesel	250	ST-53	Removed	No Further Action site in Soil Operable Unit Sites and Groundwater Operable Unit Plumes ROD, signed June 1996; SCEMD closure letter, 6/27/1996.

Table 5.4b

List of ASTs Located on Parcel G

Facility Number	Description	Status	Comments
10100	495-gallon Propane	Inactive	
10110	50-gallon Diesel	Inactive	No state requirements to remove ASTs.
	1,000-gallon Diesel	Active, owned by FAA	Owned and used by FAA
10300	1,154-gallon Propane	Inactive	No state requirements to remove ASTs.
10320	495-gallon Propane	Inactive	No state requirements to remove ASTs.
10400	1,150-gallon Propane	No longer present	The propane tank was removed in 2010 by an unknown party
10401	50-gallon Diesel	Removed	

Facility Number	Description	Status	Comments
10402	34,000-gallon Diesel/Water	Removed 2008	Completion and closure of soil remediation expected prior to property transfer.
10403	34,000-gallon Diesel/Water	Removed 2008	Completion and closure of soil remediation expected prior to property transfer.
18003	289-gallon Propane	Removed	
18011	50-gallon Diesel	Inactive	No state requirements to remove ASTs.

5.5 Military Munitions: Unexploded Ordnance (UXO), Discarded Military Munitions (DMM), Waste Military Munitions (WMM), Explosive Soils, Explosive Debris, and/or Munitions Constituents (MC)

Military Munitions UXO, DMM, WMM, explosive soils, explosive debris, and/or MC are potentially located on the Property. Three munitions-related sites are located on the property as depicted in Figure 2 of Attachment 1. One site was investigated and closure was documented under the IRP: Site OT-87, Skeet and Trap Range. Two sites were investigated and their closure documented under the Military Munitions Response Program (MMRP): Site AOC 597, Mather Lake Practice Grenade Training Area and XE402, UXO Burial Site.

5.5.1 OT-87, Skeet and Trap Range: A former skeet and trap range (IRP Site OT087) was located within the Property and was identified as a MMRP site. A remedial action was conducted at this area to excavate and dispose of clay pigeon residue and soils and sediments contaminated with lead, arsenic, and PAHs. Based on the site characterization and the completed remedial action, Site OT-87 does not have the potential for UXO, DMM, WMM, explosive soils, or explosive debris, to remain at the site or otherwise affect the future use of the Property. The only MC to remain at the site is residual lead in the soil that, some of which exceeds concentrations compatible with unrestricted residential land use. Thus, an IC to prohibit residential use will be imposed on this site. ICs related to Site OT-87 are described in Section 5.2.

5.5.2 AOC 597, Mather Lake Practice Grenade Training Area: According to a historical memorandum, the dry lake bed of Mather Lake was used as a 40-millimeter practice grenade range twice in 1977 during a drought. A munitions response action was

conducted at MMRP Site AOC 597, Mather Lake Practice Grenade Training Area, between November 2008 and June 2009. The purpose of the munitions response action was to locate, identify, and remove from the surface to a depth of 12 inches any munitions debris from the accessible portions of the former practice grenade range (i.e., the lake shore). A geophysical investigation was performed over the investigation area, and all detected anomalies were located and identified. Most contacts identified during the investigation were cultural debris items (nails, wire, bolts, and cans). A small amount of military and/or civilian small arms munitions debris was identified during the investigation and is believed to represent infrequent and informal small arms practice over the 75-year history of the base as an active military installation. No munitions debris, munitions and explosives of concern (MEC), live munitions, or other items associated with use of the site as a former practice grenade training area were encountered. In the Final Munitions Response Completion Report for Site AOC 597, Mather Lake Practice Grenade Training Area, October 2010, the Air Force recommends closure of the investigated part of the site with no associated land-use restrictions. A No Further Action Explosives Safety Submission (NFA ESS) documenting site history, results of the 2009 investigation, and current site conditions for the entire AOC 597 site was approved by the Department of Defense Explosives Safety Board in January 2011 and provided to regulatory agencies in May 2011. The NFA ESS identifies measures required to protect public health and safety at the site, including the uninvestigated areas of the practice grenade range that lie within the lake bed and marshy area. The deed and associated property transfer documents will include the notifications, restrictions, and recommendations described in the NFA ESS and reproduced in the next paragraph.

NFA ESS requirements: The deed or associated property transfer documents generated for this site will include a description of Site AOC 597; summaries of the 2007 Historical Records Review, 2009 geophysical investigation, and NFA ESS; and clear notice that there is the possibility for 40-mm practice grenades to be discovered on the property. The deed will include the following notifications, restrictions, and recommendations:

- Notification as to the presence of the former temporary practice grenade range.
- Notification as to the possible presence of practice grenades within the approximated impact area (lake bed and marshy area).
- A use restriction that requires the County to maintain portions of the east bank as closed to the public and to implement this restriction with appropriate signage and/or fencing.
- A use restriction that requires the County to continue to allow only surface recreational water activities (no swimming, diving, or wading) within Mather Lake and to implement this restriction with appropriate signage.

- A recommendation that the County post signage notifying the public that in the event any object resembling military munitions is found, especially a 40-mm grenade or a piece thereof, the item should not be touched or disturbed and the local police or fire department should be contacted to report the finding. The signage should include pictures of 40-mm practice grenades for visual identification purposes.
- A recommendation that if the portion of the lake bed or marshy area that lie within the approximated range fan arc to be disturbed (through digging, construction, dredging, etc.) there be munitions and explosives of concern (MEC) on-call construction support in the event MEC or another type of material potentially presenting an explosive hazard is discovered. MEC on-call construction support should be in accordance with Department of Defense (DoD) Manual 6055.09-M. Ammunition and Explosives Safety Standards. Volume 7, Enclosure 4, Section V7.E4.4.3.2.1. August 2010 and U.S. Army Corps of Engineers (USACE) Engineer Pamphlet 75-1-2. MEC Support During Hazardous, Toxic, and Radioactive Waste and Construction Activities, Chapter 6-6, August 2004.
- In the event that any portion of the range fan is dewatered and becomes accessible to the public, if the lake dries up again due to drought, or if any military munitions are ever encountered on the transferred property, the deed will contain covenants requiring the United States to undertake any response or corrective actions that are found necessary to address military munitions used on the property prior to the date of the deed. Provisions will also be included in the deed or other related property transfer documents to allow the United States, including the U.S. Environmental Protection Agency and the State, access to the property in any case where any such response or corrective action is found to be necessary, or where such access is necessary to carry out a response or corrective action.

5.5.3 Site XE402, UXO Burial Site: This site is located along the southern boundary of the weapons storage area in the southeast portion of Mather, straddling the southern boundary of the Property. The site was identified as a result of two reports suggesting a potential for unknown munitions waste burial in the area. In 1998, a geophysical study was conducted to identify metallic objects that could indicate buried ordnance and explosives within the site. Intrusive investigation at all anomalous magnetic signatures revealed no ordnance or explosives at the site. Based on no evidence of contamination or ordnance burial, the *Final Supplemental Basewide Operable Unit ROD*, September 2006, determined that XE402 required no further action under CERCLA. The site was closed for munitions concerns under the MMRP in July 2007.

5.6 Asbestos Containing Material (ACM)

The subject property contains ACM, as described below.

5.6.1 ACM in Structures or Buildings: An asbestos survey of Mather AFB facilities was conducted in 1990. The results are within a comprehensive report prepared by EG&G Idaho, Inc. The report, the Mather AFB Asbestos Survey Report, is maintained by the AFRPA Western Region Execution Center at the former McClellan AFB.

Nine facilities within Parcel G were identified as having ACM: Facilities 10100, 10320, 10400, 10410, 10550, 18002, 18010, 18018, and 18051. Additional facilities were identified as having possible or likely ACM during the 2011 VSIs. These facilities are 10300, 10360, 10390, 18015 (friable). In addition, facility 18004, a sewer lift station, was identified in a prior VSI as having suspected ACM; the sump vault was not inspected in 2011. Just prior to leasing Parcel G to Sacramento County (Lessee) in September of 1995, the Air Force undertook all necessary repair and/or abatement of damaged or deteriorated friable asbestos. This Air Force ACM remediation effort was required by the Lease before the Lessee could take possession of Parcel G or occupy any affected facilities. Beginning on September 26, 1995, Condition 10.6 in the Lease makes the Lessee responsible for monitoring all ACM on the leased parcels. The Lessee is also responsible to repair/abate any ACM that becomes damaged or deteriorated through the passage of time, or as a consequence of the Lessee's or sublessee's activities under the Lease. During the VSI accomplished in May 2004, floor and/or roof tiles damaged by weather were identified at Facilities 10320, 10550, and 18018, probably due to rain entering these facilities as a result of vandalized windows and doors. The 2011 VSI noted what appeared to be friable asbestos pipe insulation in the upstairs mechanical room of Building 18015.

5.6.2 ACM in Utility Pipelines: No CERCLA response action for ACM in below-ground utility pipelines is required. ACM, such as transite pipes or pipes wrapped with asbestos insulation, may be found in (or on) utility pipelines located on the Property. ACM associated with utility pipelines below ground does not pose a threat to human health or environment as long as it is not disturbed, or, if it is disturbed, proper care is taken to manage and dispose of it. Utility pipelines below the ground have not been inspected. The Transferee and subsequent transferees will be given notice of the possibility of ACM in utility pipelines through a notice in the Deed. The Deed will provide notice to the Transferee that the Air Force will not be responsible for the remediation of ACM in below-ground utility pipelines.

5.6.3 ACM in Demolition Debris: ACM, which was commonly used in building materials, may be located at building demolition locations. Based upon an inspection of the property and a review of the EBS reports, no locations where ACM from building demolition remains in the soil or in buried demolition debris are specifically known on the subject property. No CERCLA response action is required at this time. However, it is possible that there are undiscovered locations where demolition debris may be found by the Transferee or subsequent transferees during ground disturbance activities. The Transferee and subsequent transferees will

be cautioned by notice in the Deed to exercise care during ground disturbing activities. The Transferee or subsequent transferees will be required to notify the Air Force promptly of any demolition debris containing friable asbestos and believed to be associated with Air Force activities. The Transferee or subsequent transferees will be required to allow the Air Force a reasonable opportunity to investigate and, if a CERCLA response action is necessary, to accomplish it. The Deed will reserve a non-exclusive easement to the Air Force to enable it to investigate any such discoveries and take any remedial action found to be necessary.

5.6.4 General: The Deed will contain a provision stating that the Transferee and subsequent transferees, in their use and occupancy of the property, will be responsible for complying with all applicable federal, state, and local laws relating to asbestos. The Deed will also state that the Air Force will be responsible for conducting any CERCLA remedial action found to be necessary for hazardous substances released or disposed of on the property prior to the date of the Deed, so long as the property recipient is not a potentially responsible party under CERCLA for the release or disposal. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the Transferee that is inconsistent with use restrictions or covenants contained in the Deed or other related property transaction documents.

5.7 Lead-Based Paint (LBP) - Facilities other than Target Housing & Residential Property

LBP and/or LBP hazards might be present in facilities other than target housing and residential property on the property since many of the facilities listed in Table 2.0 were built prior to 1978. The Transferee will be notified through the EBS and supporting SEBS documentation of the possible presence of LBP and/or LBP hazards in these facilities. Notice will be provided to the Transferee that the Transferee will be responsible for managing all LBP hazards and potential LBP hazards in compliance with all applicable laws and regulations.

5.8 LBP and LBP Containing Materials and Debris (collectively "LBP")

LBP was commonly used prior to 1978 and may be located on the Property. The Transferee is advised to exercise caution during any use of the Property that may result in exposure to LBP. Appropriate notification and transferee's responsibilities, consistent with AFRPA policy, will be provided in the Deed relative to this fact of common use of LBP prior to 1978.

Therefore, the Deed will include a notice to the Transferee and subsequent transferees notifying them that LBP may be on the Property and advising them that caution should be exercised during any use of the Property that may result in exposure to LBP. By a grantee covenant in the Deed, the Transferee and its successors will acknowledge and accept responsibility for managing LBP, including LBP in soils, in accordance with all applicable laws

and regulations and for promptly notifying the Air Force of any discovery of LBP in soils that appears to be the result of Air Force activities and is at concentrations requiring remediation. The Transferee and subsequent transferees will be required to provide the Air Force an opportunity to investigate such discoveries and, if a CERCLA remedial action is necessary, to accomplish it. The Deed will reserve a non-exclusive easement to the Air Force to enable it to investigate any such discoveries and take any remedial action found to be necessary.

5.9 Floodplains

Portions of the Property are located within the 100-year floodplain. The Property recipient will be responsible for complying with any applicable laws and regulations relating to federal agency responsibilities for managing floodplains, including the strict control of construction located within the floodplains. In addition, the Property recipient will be responsible for ensuring the Mather Lake dams meet the jurisdictional requirements of the California Department of Water Resources, Division of Safety of Dams (DSOD).

5.10 Sanitary Sewer Systems

Certain facilities on the Property are connected to a sanitary sewer. The Transferee will be responsible for submitting required applications for discharging wastewater to the sanitary sewer system and for meeting all applicable wastewater discharge permit standards.

5.11 Septic Tanks (Wastewater)

Abandoned septic tanks and leach fields are present on the Property. Abandoned septic tanks and leach fields within the Property were located in the former WSA, the demolished dormitory area of the AC&W area, and at facilities 10300 and 10550. These septic tanks were abandoned in 2000 under permit from Sacramento County.

5.12 Threatened and Endangered Species

The Property contains seasonal wetlands and vernal pools that provide habitat for species protected under the Endangered Species Act (ESA), including the threatened vernal pool fairy shrimp (*Brachinecta lynchi*) and endangered vernal pool tadpole shrimp (*Lepidurus packardi*). Both species have been documented to occur on the Property, with occurrences of vernal pool tadpole shrimp being widespread in suitable wetland habitats. In addition, two plant species – the endangered Sacramento Orcutt grass (*Orcuttia viscida*) and threatened slender Orcutt grass (*Orcuttia tenuis*) – have not been documented as occurring at Mather but have potentially suitable habitat within the Property boundaries. The Deed will reference the existence of the species and their regulatory control and will notify the Transferee of their responsibility for

obtaining necessary approvals and implementing required mitigation prior to engaging in any actions that may affect protected species or their habitats.

Section 7 of the ESA requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) on actions that may affect a federally listed species. The Air Force has initiated Section 7 consultation for disposal of the former Mather AFB, and the USFWS Service is currently in the process of preparing a Biological Opinion. The Biological Opinion will establish requirements for the protection of federally listed species on the Property, including conservation easements or other land use controls as needed. Transfer of the Property will not occur until the Biological Opinion is finalized and issued. The Deed will contain any restrictions required by the Biological Opinion to protect threatened and endangered species.

A Wetlands Management Plan is currently being developed by Sacramento County to describe protection of wetland and vernal pool habitat at Mather as a required condition of the SROD issued by the Air Force. Pursuant to the SROD, the wetlands management plan must be approved by appropriate federal and state regulatory agencies, including but not limited to the USEPA, USFWS, California Department of Fish and Game, and the U.S. Army Corps of Engineers (USACE). Future reuse activities, including subsurface mineral extraction, must conform to applicable provisions in the Biological Opinion and/or wetlands management plan to protect threatened and endangered species.

5.13 Wetlands and Waters of the U.S.

Wetlands and waters of the U.S. on the Property are identified in the "Delineation of Potential Jurisdictional Wetlands and Waters of the U.S. for the Mather Field Study Area in Rancho Cordova" dated February 2004. The Property contains numerous jurisdictional wetland features, including vernal pools, vernal swales, vernal marshes, and seasonal wetlands. The Property is also traversed by several intermittent and perennial streams that comprise jurisdictional waters of the U.S. Jurisdictional wetlands and waters of the U.S. are regulated by Section 404 of the Clean Water Act. Wetlands and streams are also regulated by various other federal and state laws and policies, including Executive Order 11990 (Protection of Wetlands) and Section 1602 of the California Fish and Game Code. The Deed will reference the existence of these wetlands and their regulatory control, and will notify the Transferee of their responsibility for obtaining necessary approvals and implementing required mitigation prior to engaging in any actions that may impact wetlands or waters of the U.S.

6.0 STATE LAND USE COVENANT (SLUC)

The groundwater response action for the AC&W OU (WP-12) is ongoing and residual lead contamination in soil at OT-87 exceeds levels allowable for unrestricted use. Therefore, required environmental restrictive covenants to be incorporated in the Deeds are as described in

Section 5.2. Additionally, land use controls and restrictions will be incorporated into a SLUC. In the SLUC, these land use controls and restrictions will be expressed in a different format, but they will be consistent with the Air Force environmental restrictive covenants in the Deed. The SLUC will be prepared and signed by a State of California ("State") regulatory agency. The SLUC will contain certain requirements and procedures that will bind the transferee and run with the land. The SLUC will provide for State agency enforcement of the restrictive covenants in the Deed. Modifications or termination of the SLUC must be undertaken in accordance with State law and provisions in the SLUC itself. The SLUC will be signed by the Transferee and recorded within 10 days of the Property's transfer by deed.

7.0 REGULATOR COORDINATION

The California EPA and the USEPA, Region IX, were notified on May 23, 2005 of the initiation of this FOST and supporting SEBS documentation and were invited to participate in preparing the working draft documents consistent with the provisions of AFRPA's Procedures for Processing Findings of Suitability to Lease/Transfer (FOSL/FOST) and Supporting Environmental Documents, issued jointly by Alan K. Olsen, Air Force Base Conversion Agency (AFBCA), Thomas W. L. McCall Jr., U.S. Air Force, Deputy Assistant Secretary (DAS)/Environment, Safety and Occupational Health (ESOH), and Timothy Fields Jr., USEPA, Deputy Assistant Administrator (DAA)/Office of Solid Waste and Emergency Response (OSWER) in a memo dated June 8, 1995. Consolidated draft documents were initially provided on July 8, 2005 for formal agency review and comment. These were substantially revised and reissued in July 2010 as revised draft documents for formal agency review and comment. The revised drafts reflected changes to the environmental condition of the Property, changes to the status of several investigations and remedial actions, changes to conveyancing mechanisms, as well as the issuance of post-ROD changes to selected remedies.

No regulatory comments were received from DTSC, the CVWB, or the USEPA on the revised draft documents. The Draft Final FOST was issued in August 2011, and regulatory comments were received on the Draft Final FOST, which have been addressed in this Final FOST. Copies of comments from regulatory agencies are included in Attachment 5. AFRPA responses to agency comments are included in Attachment 6. Correspondence related to regulatory concurrence on this FOST is provided in Attachment 7.

DTSC has requested the following announcement be included in this FOST: Should portions of the subject Property ever be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with California Education Code 12710 et seq. must be conducted and approved by DTSC.

8.0 PUBLIC NOTICE

Public notice, as required by the FOST process, was published in the Sacramento Bee on August 9, 2010. A copy of notice is included at Attachment 8.

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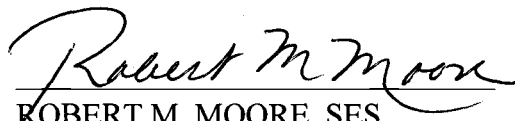
9.0 FINDING OF SUITABILITY TO TRANSFER

The proposal to transfer this Property by deed has been adequately assessed and evaluated for: (a) the presence of hazardous substances and contamination on the Property, (b) environmental impacts anticipated from the intended use for the Property, (c) adequacy of use restrictions and notifications to ensure that the intended use is consistent with protection of human health and the environment, and (d) adequate notice of disclosures, including those required by CERCLA 120(h). The anticipated future use of this Property does not present a current or future risk to human health or the environment subject to inclusion and compliance with the appropriate restrictions on use and disclosures as addressed above. The following covenant CERCLA language will be included in the Deed:

- CERCLA 120(h)(3)(A)(ii)(I) warranting that all remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the Property has been taken, or has been demonstrated to be operating properly and successfully, before the date of transfer.
- CERCLA 120(h)(3)(A)(ii)(II) warranting that any remedial action under CERCLA found to be necessary after the date of transfer with respect to such hazardous substances remaining on the property shall be conducted by the United States.
- CERCLA 120(h)(3)(A)(iii) granting the United States access to the Property in any case in which remedial action or corrective action is found to be necessary after the date of transfer.

The conditions of CERCLA Section 120(h) have been satisfied. Therefore, the Property is suitable for transfer.

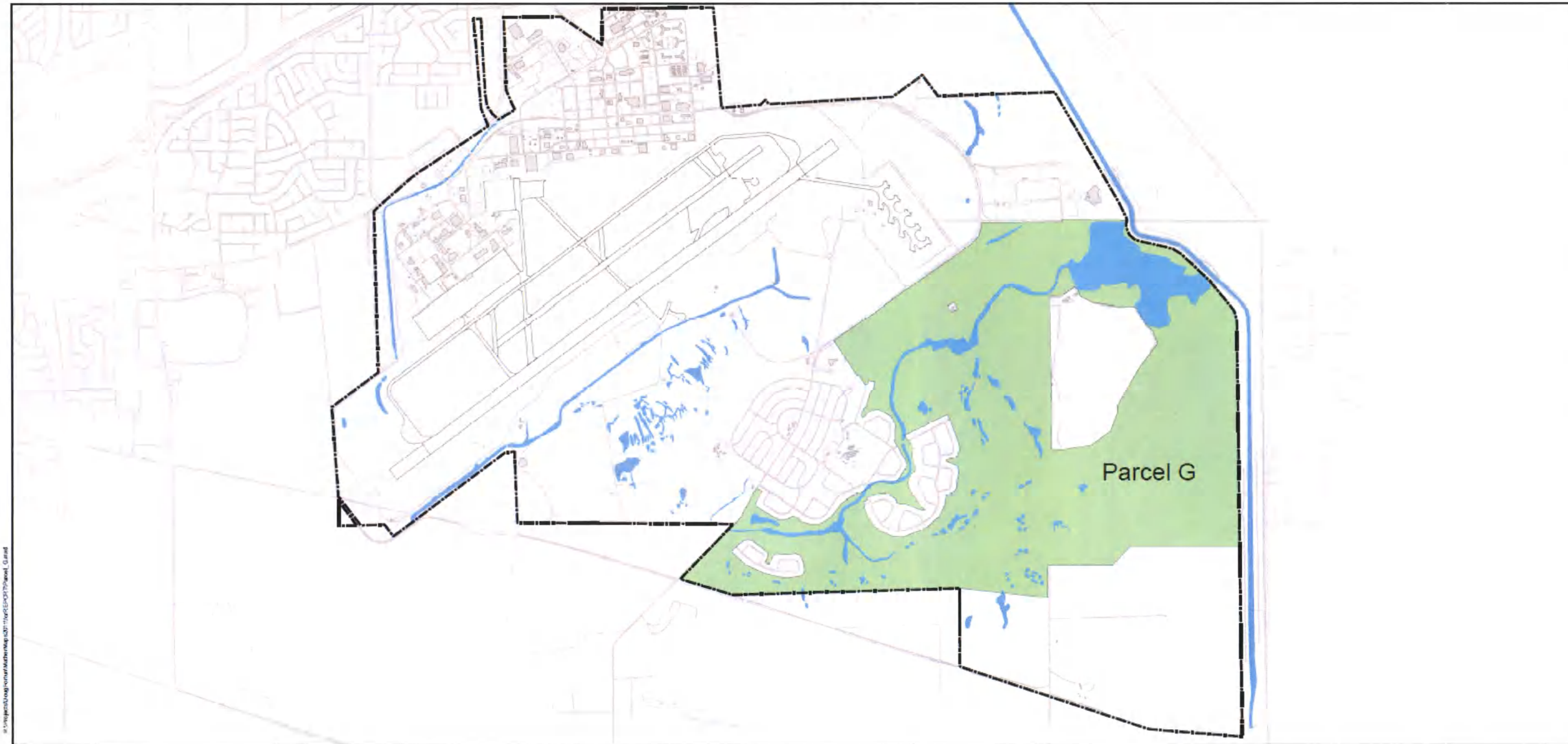
16 FEB 2012
Date


ROBERT M. MOORE, SES
Director
Air Force Real Property Agency





Attachments:

1. Property Map(s)
2. Environmental Factors Table
3. Not Used
4. Notice of Hazardous Substances Release
5. Regulator and Public Comments
6. AFRPA Responses to Regulator and Public Comments
7. FOST Concurrence Related Correspondence
8. FOST Related Notices and Correspondence

Attachment 1 – Figure 1 – Property Map



Legend

 Creeks and Lakes	 Parcel G	0 1,500 3,000 Feet
 Buildings	 Former Mather Installation Boundary	

Air Force Real Property Agency
Former Mather AFB, Sacramento, California


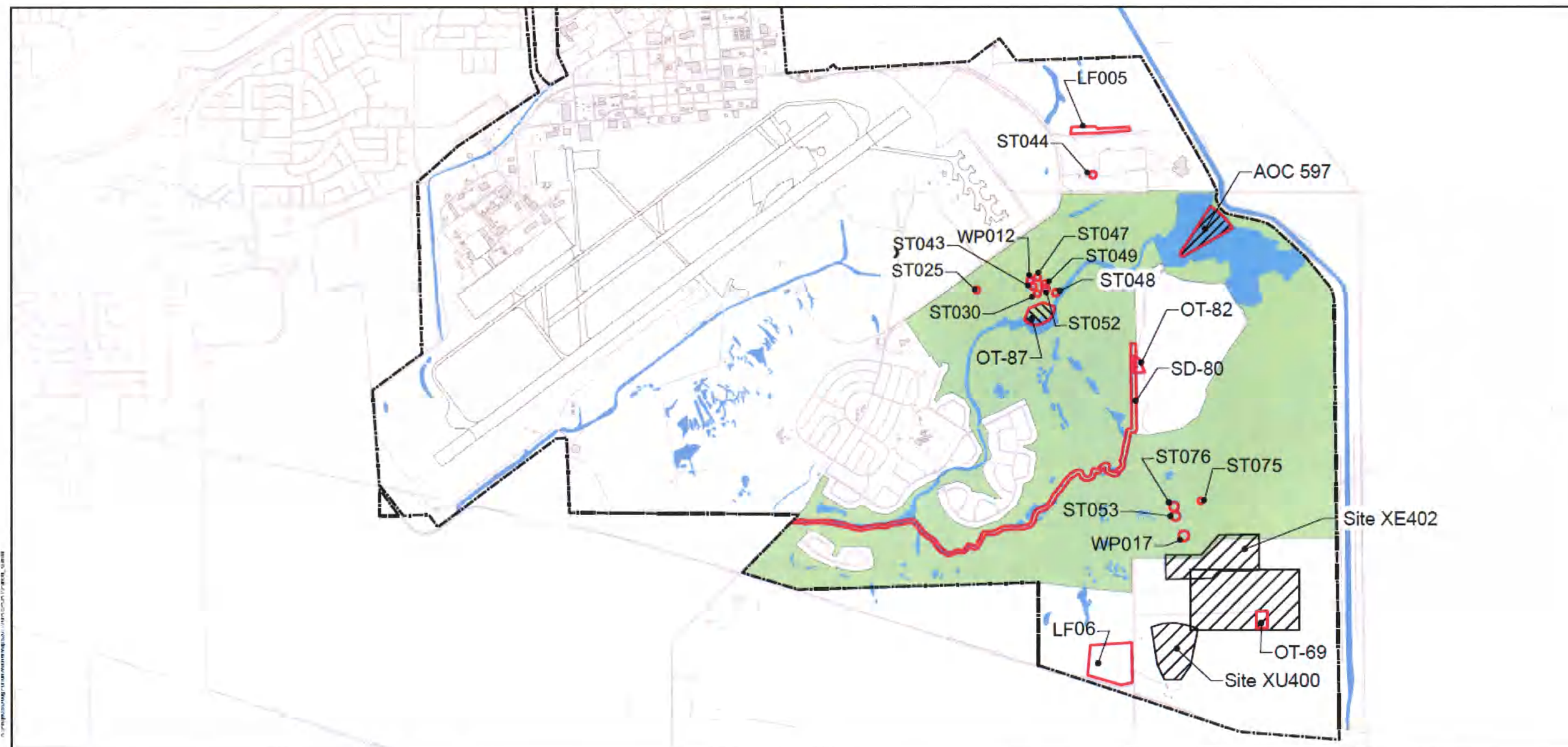





FIGURE 1
Mather AFB
Parcel G FOST
Property Map

Attachment 1

Attachment 1 – Figure 2 – IRP and MMRP Site Map



Legend

 Creeks and Lakes	 MMRP Site	0 1,500 3,000 Feet
 Parcel G	 IRP Site	
 Buildings	 Former Installation Boundary	

Air Force Real Property Agency
Former Mather AFB, Sacramento, California


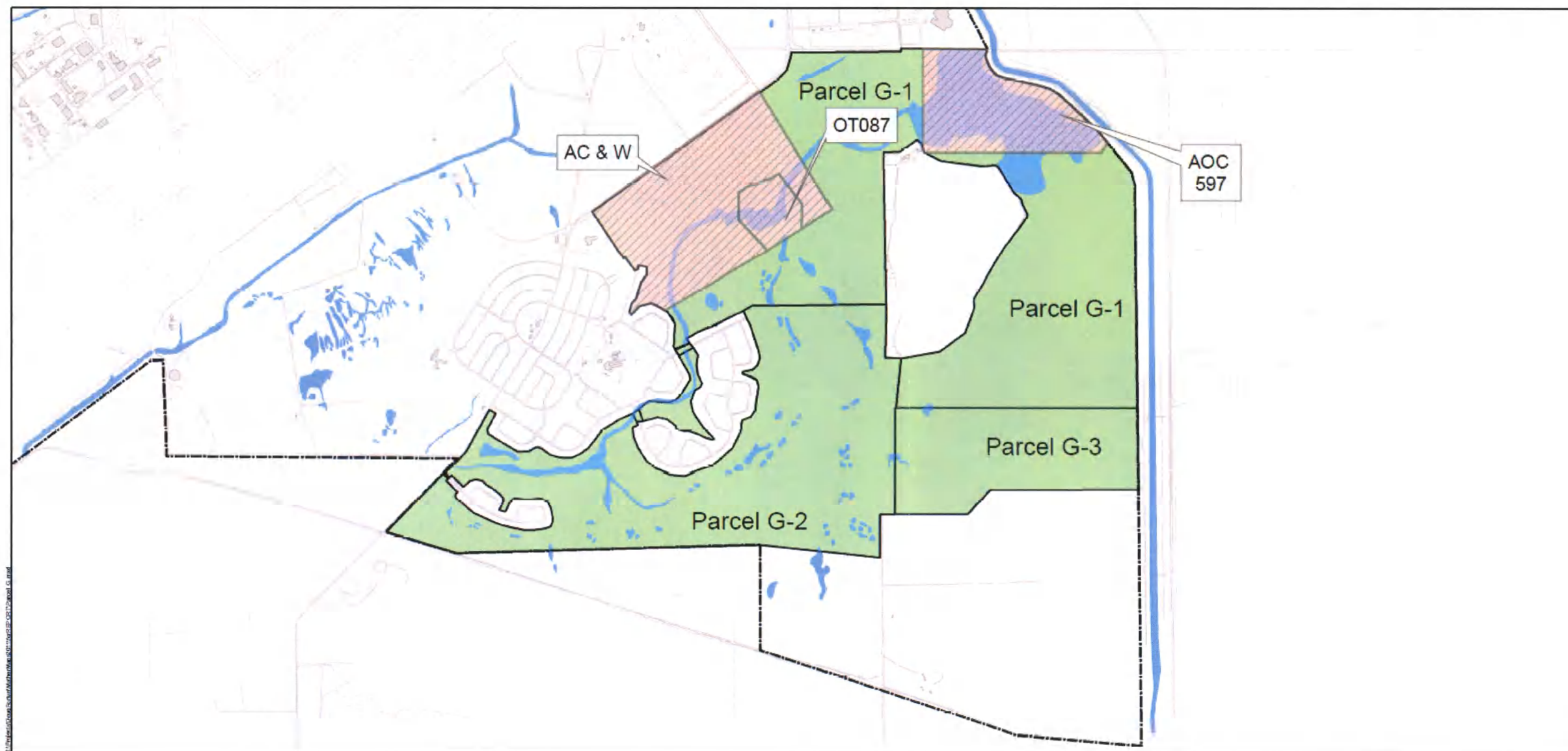


FIGURE 2
Mather AFB
Parcel G FOST
IRP & MMRP Site Map

Attachment 1

Attachment 1 – Figure 3 – IC Area Boundaries Map



Legend

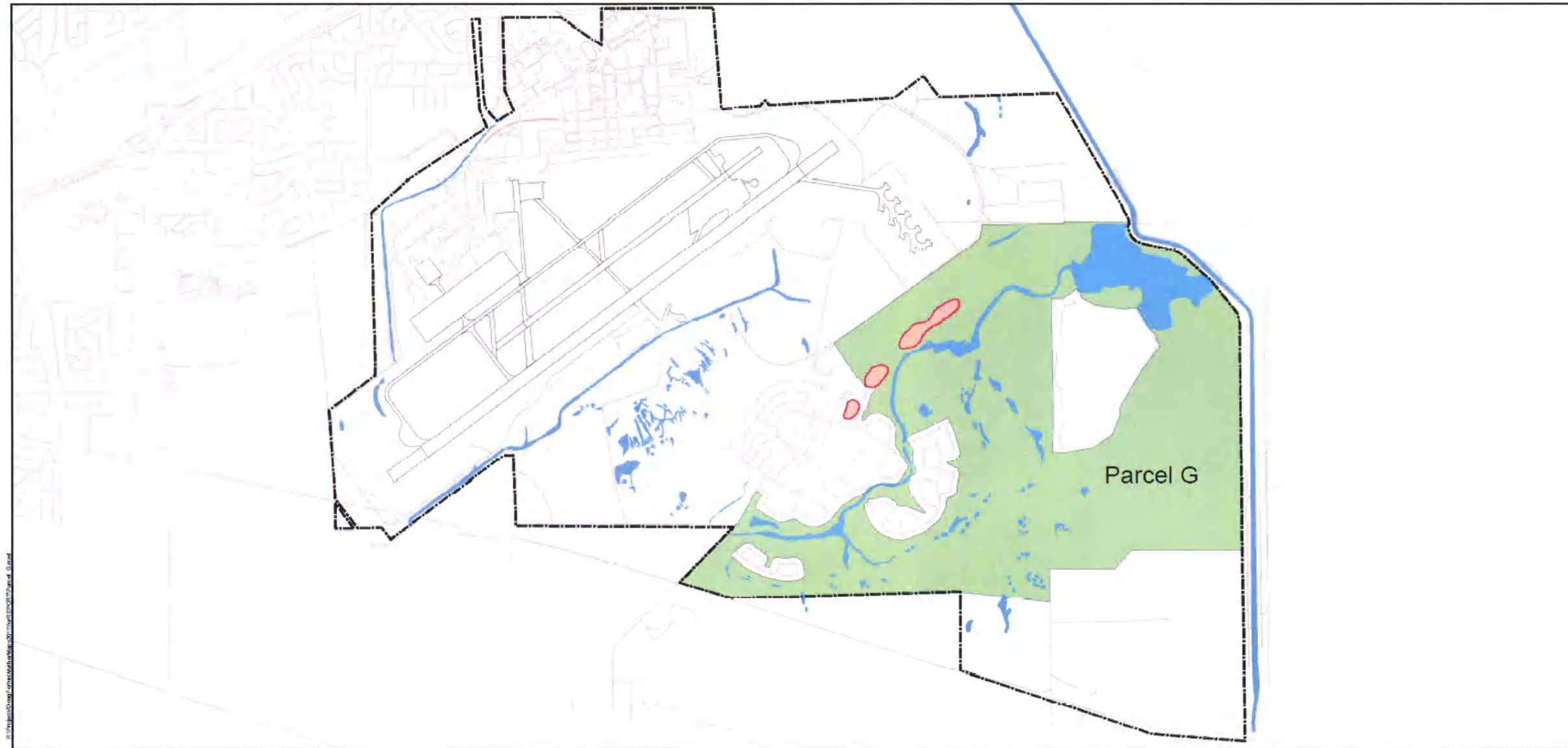
Creeks and Lakes	Parcel G	0 1,500 3,000 Feet
Buildings	Institutional Control	
Former Mather Installation Boundary		

Air Force Real Property Agency
Former Mather AFB, Sacramento, California

FIGURE 3
Mather AFB
Parcel G FOST
IC Area Boundaries

Attachment 1

Attachment 1 – Figure 4 – AC and W Plume Map



Legend

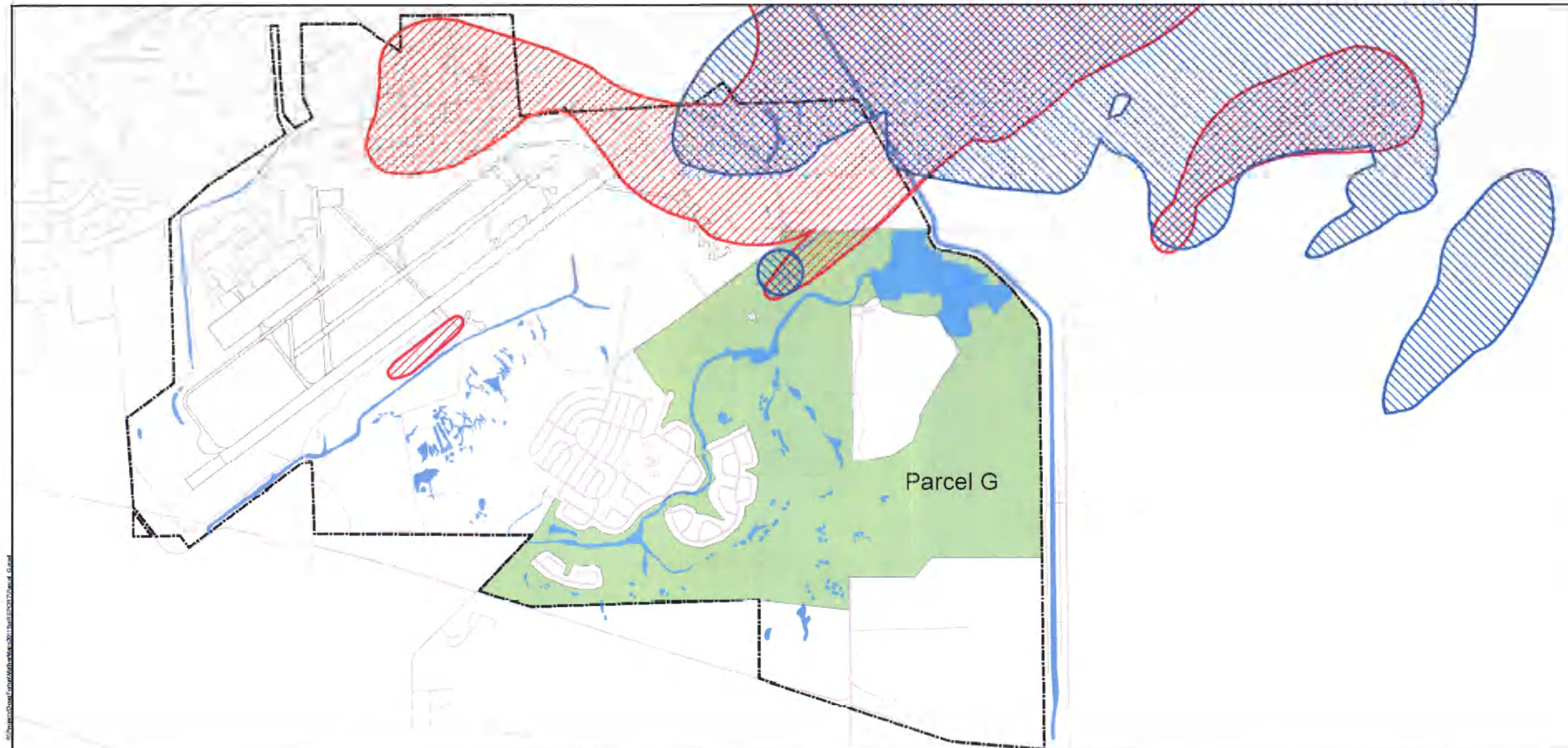
Creeks and Lakes	Parcel G	0 1,500 3,000 Feet
Buildings	Plume (TCE > 5 ug/L)	
Former Mather Installation Boundary		

Air Force Real Property Agency
Former Mather AFB, Sacramento, California

FIGURE 4
Mather AFB
Parcel G FOST
AC & W Plume Map

Attachment 1

Attachment 1 – Figure 5 – 2009 IRCTS Groundwater Plume Map




Legend	Parcel G	Perchlorate > 6 ug/L	0 1,500 3,000 Feet — Former Mather Installation Boundary
Buildings	TCE > 1.7 ug/L		
Creeks and Lakes	Overlap of TCE and Perchlorate Plumes		

FIGURE 5
Mather AFB
Parcel G FOST
2009 IRCTS Groundwater Plume

Attachment 1

Air Force Real Property Agency
 Former Mather AFB, Sacramento, California



Attachment 2 – Environmental Factors Table

(Note: Each Factor identified with an "X" in the "Yes" column is discussed in Section 5)

Deed Restriction or Notification Required?			<i>Environmental Factors Considered</i>
No	Yes		
	Notification	Deed Restriction	<i>Environmental Restoration, Hazardous Substances, Petroleum</i>
	X		Hazardous Substances (Notification)
		X	Environmental Restoration Program; (IRP, EC-CR, and AOC)
	X		Petroleum Products and Derivatives
	X		Storage Tanks (USTs/ASTs)
X			Oil/Water Separators (OWSs)
	X	X	Military Munitions (UXO), (DMM), (WMM), (MC)
X			Radioactive & Mixed Wastes
			<i>Disclosure Factors/Resources:</i>
	X		Asbestos Containing Material (ACM)
X			Drinking Water Quality
X			Indoor Air Quality (Radon)
X			Lead-Based Paint (Target Housing & Residential Property)
	X		Lead-Based Paint (Other than Target Housing & Res Property)
	X		LBP and LBP Containing Materials and Debris
X			PCBs
			<i>Other Factors:</i>
X			Outdoor Air Quality/Air Conformity/Air Permits
X			Energy (Utilities)
X			Pesticides
	X		Flood plains
X			Historic Property (Archeological/Native American, Paleontological)
	X		Sanitary Sewer Systems
	X		Septic Tanks
X			Solid Waste
			<i>Biological Resources:</i>
		X	Sensitive Habitat
		X	Threatened and Endangered Species
		X	Wetlands

Attachment 4 – Notice of Hazardous Substance Release

Notice is hereby provided that the information set out below provides notice of hazardous substances that are known to have been disposed of or released on the Property. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, and Liability Act (CERCLA or “Superfund”) 42 U.S. C. section 9620(h).

IRP Site WP012

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/pounds	Date	Hazardous Waste ID Number (if applicable)	Response	Remarks
Trichloro-ethene (TCE)	Trichloro-ethylene	79-01-6	Unknown	Unk.	79-01-6	A TCE-contaminated groundwater plume originating from the IRP Site WP012 (AC&W) Site has impacted groundwater underlying a portion of the property. The site is currently being remediated under the 1993 AC&W ROD. Remediation activities include groundwater extraction; treatment by air stripping; and discharge of treated effluent to Mather Lake. When the treatment system was started in 1995, treated water was injected back into the aquifer in accordance with ROD. However, in 1997 the Air Force began discharging the treated water to Mather Lake under authority of the ESD to the AC&W ROD, dated 1997. Based on concerns from the USEPA and the State of California as related to the long-term protectiveness of the AC&W remedy, a ROD ESD addressing Institutional Controls (ICs) for the Site WP012 Groundwater Remedy was finalized in November 2008. The ICs will be kept in place until the AC&W groundwater cleanup objective of five micrograms per liter TCE in the aquifer is met.	The TCE contaminated groundwater plume underlies a portion of the property. The determination that the remedy is operating properly and successfully (OPS) indicated that necessary remedies have been put in place and are operating as designed.

Attachment 4 – Notice of Hazardous Substance Release

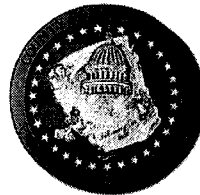
IRP Site OT87 (Site 87, Skeet Range)

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/pounds	Date	Hazardous Waste ID Number (if applicable)	Response	Remarks
Lead	Pb	7439-92-1	Unknown	Unk.	NA	ICs for Site 87 will remain in effect as long as the site contains contamination incompatible with unrestricted land use. Site 87 is a former Skeet Range and trap range at the former Mather AFB, located near the AC&W Site. It contained an area where clay pigeon fragments had accumulated, and an area of lead shot accumulation that encompassed part of Morrison Creek. The 1998 ROD for the Basewide OU Sites selected excavation and stabilization as the remedies for Site 87. In 1998, the contaminated soil, clay pigeon material, and lead shot were excavated. The excavated soil was treated to remove recoverable lead, and stabilized as necessary for use in building foundation for the Site WP007 cap. The project was completed in 1999 to meet cleanup levels for recreational land use. Because the established cleanup goal was based on a recreational land-use scenario, and is above the residential and unrestricted standard for lead, ICs are being implemented at the site. ICs for Site 87 will remain in effect as long as the site contains contamination incompatible with unrestricted land use. The ICs include land use restrictions and prohibitions on soil disturbance activities without prior Air Force and regulatory agency approval.	Lead contamination remaining in site soils (shallow soil) above levels allowable for residential and unrestricted use

Attachment 5 – Regulator and Public Comments

**COUNTY OF SACRAMENTO
DEPARTMENT OF ECONOMIC DEVELOPMENT AND
INTERGOVERNMENTAL AFFAIRS**

Steven C. Szalay
Interim County Executive



Navdeep S. Gill
Interim Director

January 23, 2011

Phillip H. Mook
AFRPA Western Region Execution Center
3411 Olson Street
McClellan, CA 95652

Dear Mr. Mook:

After review of the Mather Air Force Base Draft Finding of Suitability to Transfer (FOST) for Parcel G the County of Sacramento Department of Economic Development (County) has the following comments:

1. Regarding Mather Lake Dam and the responsibility for ensuring that the dam meets the jurisdictional requirements of the California Department of Water Resources, Division of Safety of Dams (DSOD), it is the County’s position that it is the responsibility of the Air Force to make any and all necessary repairs to meet DSOD requirements. The responsibility for the integrity of the dam is assigned to the Air Force in the purchase documents for Parcel D. Parcel D is commonly referred to as the Mather Air Force Base Family Housing Complex.

This responsibility is assigned in the 1997 “Offer To Purchase Real Estate and Acceptance for Former Mather Air Force Base”. The purchase offer was signed by Albert F Lowas Jr., Director of the Air force Base Conversion Agency on July 10, 1998. The purchase offer for Parcel D states in Section 2.5.3 that “Seller shall complete all repairs recommended in the study of Mather Lake Dam performed pursuant to Section 2.5.2(c) hereof, as well as any additional repairs deemed necessary by the California Division of Safety of Dams, and have the Mather Lake Dam re-inspected in order to obtain a certification from the Division of Safety of Dams approving the Mather Lake Dam for the storage of water”.

Therefore the County contends that in the FOST for Parcel G that it clearly be stated that the obligation for bringing Mather Lake Dam up to current standards is the sole responsibility of the Air Force.

Attachment 5 – Regulator and Public Comments

2. Section 5.6.3 references undiscovered locations where asbestos demolition debris may be located. The County requests that the Air Force cite specific locations where asbestos demolition debris may be located.

3. Section 5.11 discusses the septic tanks and leach fields associated with Parcel G. Section 5.11 states "The Transferee will be notified through the SEBS of the location and status of the tanks". The SEBS only discusses the condition of the septic tank located at Site WP017 stating that "investigations at Site 17 revealed no constituents of concern at the site". The SEBS does not state when the site was investigated nor what data was collected and analyzed. The SEBS is silent on the septic tanks associated with dorms at the AC&W site, Facility 10300 and Facility 10550. Therefore the FOST statement that "the Transferee will be notified through the SEBS of the location and status of the tanks" is not accurate. Accordingly it would be appropriate for the Air Force to be responsible for demonstrating that the septic tanks and associated leach fields are not the cause of any contamination to the property and that the tanks currently do not contain any hazardous waste.

We look forward to discussing these points with you in the near future.

Yours truly,



Rick Balazs
Senior Project Manager
Sacramento County Department of Economic Development
700 H Street, Suite 4650
Sacramento, CA 95814

Attachment 5 – Regulator and Public Comments



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

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



Edmund G. Brown Jr.
Governor

October 4, 2011

Mr. Douglas V. Fortun
AFRPA Western Region Execution Center
3411 Olson Street
McClellan, California 95652-1003

DRAFT FINDING FINDING OF SUITABILITY TO TRANSFER (FOST) AND DRAFT
SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS), PARCELS G,
FORMER MATHER AIR FORCE BASE, CALIFORNIA

Dear Mr. Fortun:

The Department of Toxic Substances Control (DTSC) has completed our review of the
"Mather Air Force Base, Draft Finding of Suitability to Transfer, Parcel G" and "Draft
Finding Supplemental Environmental Baseline Survey for Parcel G, Former Mather Air
Force Base, California," both dated August 2011.

The attached comments should be responded to or resolved in the final version of the
FOST and SEBS documents.

If you have any questions, please contact me at (916) 255-3584 or e-mail at
FMark@dtsc.ca.gov.

Sincerely,

Franklin Mark

Franklin Mark
Hazardous Substances Engineer
Sacramento Office
Brownfields and Environmental Restoration Program

Attachment

cc: See next page

RECEIVED
OCT 06 2011

Attachment 5 – Regulator and Public Comments

Mr. Douglas V. Fortun
October 4, 2011
Page 2

cc: Mr. John Lucey
United States Environmental Protection Agency
Region IX
75 Hawthorne Street, Mail SFD-8-1
San Francisco, California 94105

Ms. Conny Mitterhofer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, # 200
Rancho Cordova, California 95670-6114

Mr. William T. Hughes
ASE Inc.
c/o AFRPA / Western REC
3411 Olsen Street
McClellan, California 95652-1003

Attachment 5 – Regulator and Public Comments

COMMENTS ON THE DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER (FOST), AND SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS) FOR PARCEL G, FORMER MATHER AIR FORCE BASE, CA

General Comment:

1. The FOST does not provide figures or maps of the AC&W groundwater plume and remedial system or institutional control boundaries for Site OT-87 and AOC 597 which would be subject to the deed restrictions described in Sections 5.2 and 5.5.
2. Comments provided on this FOST may be applicable to the SEBS, revise as appropriate.

Specific Comment:

3. FOST, Section 5.2, page 14: The restrictive covenant for lead in soil at Site OT-87 incorrectly refers to the "designated Site 89 area" in the first bullet. Also, there is a reference to Figure 5 in the second bullet which was not included in this FOST or SEBS. Figure 5 refers to a map of Site OT-87 with institutional control boundaries.
4. FOST, Section 5.5.1, page 21: The section states that "Based on the completed remedial action, Site OT087 does not have the potential for UXO, DMM, WMM, explosive soils, explosive debris, or MC to remain at the site or otherwise affect the future use of the Property." This statement is incorrect. Site OT-87 has residual lead concentrations in soil which does restrict future use of the property. Lead is categorized as a munitions constituent (MC).
5. FOST, Section 5.5.2, page 22: The section states for Site AOC 597 (Mather Lake Practice Grenade Training Area) that the "deed and associated property transfer documents will include the notification, restrictions, and recommendations described in the NFA ESS." Please provide the notifications and deed restrictions required for Site AOC 597 and a map showing the institutional control boundaries.
6. FOST, Section 5.7, page 24: Were there any LBP surveys performed on existing buildings that were constructed prior to 1978 or soil samples analyze for lead in areas where building (constructed prior to 1978) were demolished?
7. FOST, Section 6, page 26: Typo in the first sentence.
8. FOST, Attachment 1, Figure 2, page 31: The IRP and MMRP Site map needs to be enlarged. The site information depicted on the map has a small font size and is not legible.
9. FOST, Attachment 2, page 32: The box indicating deed restriction should be marked for Military Munitions due to the deed restrictions required for Sites OT-87 and AOC 597.

Attachment 5 – Regulator and Public Comments



Matthew Rodriguez
Secretary for
Environmental Protection

California Regional Water Quality Control Board
Central Valley Region
Katherine Hart, Chair

11020 Sun Center Drive, #200, Rancho Cordova, California 95670-6114
(916) 464-3291 • FAX (916) 464-4645
<http://www.waterboards.ca.gov/centralvalley>



Edmund G. Brown Jr.
Governor

21 September 2011

Mr. Douglas Fortun
AFRPA Western Region Execution Center
3411 Olson Street
McClellan, CA 95652-1003

~~DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER, PARCEL G, FORMER MATHER AIR FORCE BASE (AFB), SACRAMENTO COUNTY~~

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff has reviewed the Draft Final Finding of Suitability to Transfer for Parcel G (FOST), submitted on 23 August 2011. The purpose of the FOST is to document environmentally related factors and the suitability to transfer real property and improvements on Parcel G. The Central Valley Water Board staff's General and Specific Comments are presented below.

GENERAL COMMENTS

1. Discussions during the Mather BRAC Cleanup Team (BCT) Meeting on 31 August 2011 suggested that there might be a disagreement between the Department of Fish and Game (DFG) and the Air Force with regards to the protectiveness and/or monitoring requirements at IRP Site OT087 (Skeet and Trap Range), potentially resulting in an informal or formal dispute.

It is not clear how this FOST can move forward if this question has not been resolved. CERCLA 120(h)(3)(A)(ii)(I) warrants that all remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the property has been taken, or has been demonstrated to be operating property and successfully, before the date of transfer. Please address this issue.

2. Section 4 indicates that a perchlorate- and TCE-containing groundwater plume, originating from the Inactive Rancho Cordova Test Site (IRCTS), has been detected in the northern area of the property west of Mather Lake. The IRCTS project has installed and is operating one extraction well on the Parcel G property.

Please indicate whether deed restrictions and a State Land Use Covenant for this deeper groundwater plume will be in place to prohibit the installation of groundwater wells or extraction of groundwater, other than for remediation and monitoring, in the area of the IRCTS plume.

California Environmental Protection Agency



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Attachment 5 – Regulator and Public Comments

Draft Final FOST, Parcel G
Former Mather Air Force Base

-2-

21 September 2011

3. The document should include a figure that shows the entire former base and the location of Parcel G. Please also include a figure that shows the location of the IRCTS groundwater plume as it overlaps Parcel G.
4. Review the comments on the Draft Final Supplemental Environmental Baseline Survey, Parcel G and revise the Draft Final FOST, as appropriate.
5. This agency should be referenced as 'Central Valley Regional Water Quality Control Board' the first time it appears in the text and referenced as 'Central Valley Water Board' thereafter. Please remove the acronyms 'CVRWQCB', 'RWQCB', or 'CVWB' from the document.
6. Please consider double-siding the final version of this document.
7. It is not clear why the term 'waste discharge requirement' is listed twice in the List of Acronyms on Page iv. Please either explain or remove the redundant listing.

SPECIFIC COMMENTS

1. The first paragraph in Section 5.2, Environmental Restoration Program, on Page 13 states that the most recent groundwater monitoring data for STSW-170A from 2009 indicated a perchlorate concentration of 627 µg/L and a TCE concentration of 5 µg/L. This paragraph should be updated to reflect that this well was last sampled in June 2011.
2. Please provide a legible version of Attachment 8, the public notice for the Parcel G FOST.

If you have any questions, please contact me at (916) 464-4821 or email me at cmitterhofer@waterboards.ca.gov.



CONNIE MITTERHOFER, P.E.
Water Resources Control Engineer
Federal Facilities Unit

cc: Mr. John Lucey, United States Environmental Protection Agency, San Francisco, CA
Mr. Franklin Mark, Department of Toxic Substances Control, Sacramento, CA

Attachment 5 – Regulator and Public Comments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

October 17, 2011

Mr. Douglas V. Fortun
AFRPA Western Region Execution Center
3411 Olson Street
McClellan CA 95652-1003

Dear Mr. Fortun:

This letter transmits EPA's comments on the document entitled "Draft Final Finding of Suitability to Transfer, Parcel G, Mather Air Force Base, California", and dated August, 2011. If you have any questions please call me at (415) 972-3145.

Sincerely,

A handwritten signature in cursive script that reads "John Lucey".

John Lucey,
Remedial Project Manager
U.S. EPAcc: Franklin Mark, California DTSC
Marcus Pierce, California RWQCB

Attachment

Attachment 5 – Regulator and Public Comments

EPA comments on the Draft Final Finding of Suitability to Transfer, Parcel G, Mather Air Force Base; Dated: August 2011

1. FOST Section 1.2 should be reviewed and updated with the most current list of documents including new AR#s if available. Is this list supposed to be in chronological order? It seems that some documents are out of order. There appears to be a double listing with items 44 and 48. Item 50 VSI should be fully referenced with an AR#. Section 1.2 should be updated with current list of documents including:
 - Final SEBS,
 - the most recent Annual Groundwater Monitoring Report ,
 - Phil Mook's Letter dated October 19, 2011,
 - Final OPS report(s),
 - EPA's OPS concurrence letter,
 - Final or Draft Biological Opinion,
 - Final Mather Lake ESS Report
 - Any applicable site closure reports
2. The FOST should include new figures that show where ICs will be implemented. The existing figures do not clearly show the boundaries for IC implementation.
3. Section 4 Page 7, This section should include a full description for Mather Lake and Site 87; including a summary of the RI/FS, MMRP, selected remedy, current status of the remedy (environmental condition).
4. Section 4 Page 7, This section should describe the remedy for Site 87 including the small mammal survey and the potential need for additional monitoring at the site.
5. Section 4 Page 8, The fourth paragraph on page 8 describes the RWQCB cleanup at ST-48. This cleanup should be described in more detail.
6. Section 4 Page 9, The last sentence in Section 4.0 is out of place and should be moved to the third paragraph of the section.
7. Draft Final FOST P. 10, Section 5.2: This section needs to be reorganized with subsections or headings. The title of section 5.2 does not reflect what is in the section.
8. Draft Final FOST P. 10, Section 5.2: The first paragraph in this section describes 15 IRP Sites on the Property. It would be helpful to have a table showing all of the sites with the current site status, type of contamination (soil or groundwater) and selected remedy if applicable. This table should also clarify if deed notifications or restrictions are required for the 3 IRP sites.
9. Draft Final FOST P. 13 - 16, Section 5.2: These pages describe the deed covenants and ICs. It would be helpful to organize these pages into separate subsections for the IRP Sites, Groundwater Contamination, and Site Access Issues, etc.

Attachment 5 – Regulator and Public Comments

10. Draft Final FOST P. 13 - 16, Section 5.2: The Final Mather Lake ESS Report includes ICs and land use restrictions that should be included in this section. The MMRP investigation results should be described in this section.
11. Section 5.2, page 14, first bullet for Site WP-12: This bullet states that the grantee will not install wells for any purpose other than remediation or monitoring. This language is confusing and should be revised and clarified. I assume this means that the grantee may need to install remediation wells in future but I'm not sure. This section should reference the local well installation requirements. The FOST should state that the deed will include notification of the Sacramento County Well Ordinance and the Aerojet plume beneath the Property. This section should and state that all wells and subsurface excavations need to be preapproved by AF, EPA & State.
12. Section 5.6, Asbestos Containing Material, page 22: The sections on ACM state that the responsibility of ACM abatement is on the Transferee. EPA prefers that the Air Force abate the ACM before transferring the property.
13. Section 5.8, LBP, page 24: EPA prefers that the Air Force abate the LBP containing material before transferring the property.
14. Section 7.0 Regulator Coordination: This section should say that transfer of the property will not occur until USEPA and DTSC have an opportunity to review and provide comments on the environmental notifications and restrictions in the draft Deed.

Attachment 6 – AFRPA Response to Regulator and Public Comments

County of Sacramento, Department of Economic Development and Intergovernmental Affairs comments dated 23 Jan 11 on the Draft Final Finding of Suitability to Transfer for Parcel G, Former Mather Air Force Base, CA

County comment 1: Regarding Mather Lake Dam and the responsibility for ensuring that the dam meets the jurisdictional requirements of the California Department of Water Resources, Division of Safety of Dams (DSOD), it is the County's position that it is the responsibility of the Air Force to make any and all necessary repairs to meet DSOC requirements. The responsibility for the integrity of the dam is assigned to the Air Force in the purchase documents for Parcel D. Parcel D is commonly referred to as the Mather Air Force Base Family Housing Complex.

This responsibility is assigned in the 1997 "Offer To Purchase Real Estate and Acceptance for Former Mather Air Force Base". The purchase offer was signed by Albert F Lowas Jr., Director of the Air Force Base Conversion Agency on July 10, 1998. The purchase offer for Parcel D states in Section 2.5.3 that "Seller shall complete all repairs recommended in the study of Mather Lake Dam performed pursuant to Section 2.5.2(c) hereof, as well as any additional repairs deemed necessary by the California Division of Safety of Dams, and have the Mather Lake Dam re-inspected in order to obtain a certification from the Division of Safety of Dams approving the Mather Lake Dam for the storage of water".

Therefore the County contends that in the FOST for Parcel G that it clearly be stated that the obligation for bringing Mather Lake Dam up to current standards is the sole responsibility of the Air Force.

AFRPA response: The Air Force does not intend to improve the Mather Lake Dam. AFRPA is willing to transfer Mather Lake to Sacramento County as is, but if Sacramento County does not want the lake, AFRPA will solicit other recipients.

County comment 2: Section 5.6.3 references undiscovered locations where asbestos demolition debris may be located. The County requests that the Air Force cite specific locations where asbestos demolition debris may be located.

AFRPA response: There are no specific locations where asbestos demolition debris is known to be located. The text in Section 5.6.3 merely serves as a notice that if demolition debris is encountered on the property, it may contain asbestos. This is standard text for a FOST. The deed will contain a similar notice provision.

County comment3: Section 5.1.1 discusses the septic tanks and leach fields associated with Parcel G. Section 5.11 states "The Transferee will be notified through the SEBS of the location and status of the tanks". The SEBS only discusses the condition of the septic

Attachment 6 – AFRPA Response to Regulator and Public Comments

tank locations at Site WP017 stating that “investigations at Site 17 revealed no constituents of concern at the site”. The SEBS does not state when the site was investigated nor what data was collected and analyzed. The SEBS is silent on the septic tanks associated with dorms at the AC&W site, Facility 10300 and Facility 10550. Therefore the FOST statement that “the Transferee will be notified through the SEBS of the location and status of the tanks” is not accurate. Accordingly it would be appropriate for the Air Force to be responsible for demonstrating that the septic tanks and associated leach fields are not the cause of any contamination to the property and that the tanks currently do not contain any hazardous waste.

AFRPA response: The FOST and SEBS have been revised to reflect the fact that the septic tanks formerly located at the demolished dormitory area of the AC&W area; at facilities 10300 and 10550; and at the former weapons storage area, were abandoned in 2000 under permit from Sacramento County. No significant concentrations of contaminants were found at these sites.

Attachment 6 – AFRPA Response to Regulator and Public Comments

**State of California Department of Toxic Substances Control (DTSC)
comments dated 4 Oct 11 on the
Draft Final Finding of Suitability to Transfer for Parcel G,
Former Mather Air Force Base, CA**

General Comment:

DTSC 1: The FOST does not provide figures or maps of the AC&W groundwater plume and remedial system or institutional control boundaries for Site OT-87 and AOC 597 which would be subject to the deed restrictions described in Sections 5.2 and 5.5.

Air Force Response: Figure 2 has been revised to show the AC&W Plume and IC boundaries for the plume, Site OT-87, and AOC 597.

DTSC 2: Comments provided on this FOST may be applicable to the SEBS, revise as appropriate.

Air Force Response: The SEBS has been revised to reflect responses to these comments.

Specific Comment:

DTSC 3: FOST, Section 5.2, page 14: The restrictive covenant for lead in soil at Site OT-87 incorrectly refers to the “designated Site 89 area” in the first bullet. Also, there is a reference to Figure 5 in the second bullet which was not included in this FOST or SEBS. Figure 5 refers to a map of Site OT-87 with institutional control boundaries.

Air Force Response: The reference to Site 89 has been corrected to Site OT087. The reference to Figure 5 has been clarified to state that it is a reference to the Site OT087 IC area identified in Figure 5 of the ESD.

DTSC 4: FOST, Section 5.5.1, page 21: The section states that “Based on the completed remedial action, Site OT087 does not have the potential for UXO, DMM, WMM, explosive soils, explosive debris, or MC to remain at the site or otherwise affect the future use of the Property.” This statement is incorrect. Site OT-87 has residual lead concentrations in soil which does restrict future use of the property. Lead is categorized as a munitions constituent (MC).

Air Force Response: The statement has been revised to reflect the residual lead contamination at Site OT-87, “Based on the completed remedial action, Site OT087 does not have the potential for UXO, DMM, WMM, explosive soils, or explosive debris to remain at the site or otherwise affect the future use of the Property. The only MC to remain at the

Attachment 6 – AFRPA Response to Regulator and Public Comments

site is residual lead in the soil that exceeds concentrations allowed for residential land use.” Thus, an IC to prohibit residential use will be imposed on this site.

DTSC 5: FOST, Section 5.5.2, page 22: The section states for Site AOC 597 (Mather Lake Practice Grenade Training Area) that the “deed and associated property transfer documents will include the notification, restrictions, and recommendations described in the NFA ESS.” Please provide the notifications and deed restrictions required for Site AOC 597 and a map showing the institutional control boundaries.

Air Force Response: Section 5.5.2 has been revised to include the notification, restrictions, and recommendations described in the No Further Action ESS for Area of Concern (AOC) 597. Figure 2 has been revised to show the lands area subject to land-use restrictions. The notifications and recommendations pertain to the entirety of Mather Lake and its surrounding shorelines to include marshy areas.

The deed or associated property transfer documents generated for this site will include a description of Site AOC 597; summaries of the 2007 Historical Records Review, 2009 geophysical investigation, and NFA ESS; and clear notice that there is the possibility for 40-mm practice grenades to be discovered on the property. The deed will include the following notifications, restrictions, and recommendations:

- Notification as to the presence of the former temporary practice grenade range.
- Notification as to the possible presence of practice grenades within the approximated impact area (lake bed and marshy area).
- A use restriction that requires the County to maintain portions of the east bank as closed to the public and to implement this restriction with appropriate signage and/or fencing.
- A use restriction that requires the County to continue to allow only surface recreational water activities (no swimming, diving, or wading) within Mather Lake and to implement this restriction with appropriate signage.
- A recommendation that the County post signage notifying the public that in the event any object resembling military munitions is found, especially a 40-mm grenade or a piece thereof, the item should not be touched or disturbed and the local police or fire department should be contacted to report the finding. The signage should include pictures of 40-mm practice grenades for visual identification purposes.
- A recommendation that if the portion of the lake bed or marshy area that lie within the approximated range fan arc to be disturbed (through digging, construction, dredging, etc.) there be munitions and explosives of concern (MEC) on-call construction support in the event MEC or another type of material potentially presenting an explosive hazard is discovered. MEC on-call construction support should be in accordance with Department of Defense (DoD) Manual 6055.09-M. Ammunition and Explosives Safety Standards. Volume 7, Enclosure 4, Section V7.E4.4.3.2.1. August 2010 and U.S. Army Corps of

Attachment 6 – AFRPA Response to Regulator and Public Comments

- Engineers (USACE) Engineer Pamphlet 75-1-2. MEC Support During Hazardous, Toxic, and Radioactive Waste and Construction Activities, Chapter 6-6, August 2004.
- In the event that any portion of the range fan is dewatered and becomes accessible to the public, if the lake dries up again due to drought, or if any military munitions are ever encountered on the transferred property, the deed will contain covenants requiring the United States to undertake any response or corrective actions that are found necessary to address military munitions used on the property prior to the date of the deed. Provisions will also be included in the deed or other related properly transfer documents to allow the United States, including the U.S. Environmental Protection Agency and the State, access to the property in any case where any such response or corrective action is found to be necessary, or where such access is necessary to carry out a response or corrective action.

DTSC 6: FOST, Section 5.7, page 24: Were there any LBP surveys performed on existing buildings that were constructed prior to 1978 or soil samples analyze for lead in areas where building (constructed prior to 1978) were demolished?

Air Force Response: The question is overboard. Nevertheless, the Air Force knows of only three LBP surveys performed on structures on the former Mather AFB: (1) then existing single family housing; (2) the Bachelor Officer Quarters (BOQs); and, (3) the Bachelor Enlisted Quarters (BEQs) were all tested for LPB in 1991. The Air Force has no LBP surveys pertaining to existing buildings or structures (collectively “improvements”) on Parcel G that were constructed prior to 1978. Such surveys may have been done when Mather was an active base. For the purposes of disposing of land and improvements on closed bases, the Air Force does not generally perform any new LBP surveys in/or existing improvements or in the soils around older improvements because deed recipients must accept the land and improvements “as is.” As section 5.7 and 5.8 state, the Air Force deeds will contain the standard notifications and warnings about LBP. Also, the Air Force will appropriately respond to any newly discovered LBP in soils that is the result of historical Air Force activities/improvements and even take remedial action if the Air Force finds it to be necessary.

No record of LBP soil surveys at sites where improvements were demolished were found, with the exception of the Site 87 lead investigations that overlapped the former locations of the skeet range buildings, but were not intended to specifically sample the building locations.

DTSC 7: FOST, Section 6, page 26: Typo in the first sentence.

Air Force Response: The term “on=going” has been corrected to read, “on-going”.

Attachment 6 – AFRPA Response to Regulator and Public Comments

DTSC 8: FOST, Attachment 1, Figure 2, page 31: The IRP and MMRP Site map needs to be enlarged. The site information depicted on the map has a small font size and is not legible.

Air Force Response: The figures have been enlarged as requested to provide more legible legend and label text.

DTSC 9: FOST, Attachment 2, page 32: The box indicating deed restriction should be marked for Military Munitions due to the deed restrictions required for Sites OT-87 and AOC 597.

Air Force Response: The box has now been populated with a checkmark to indicate deed restrictions related to Military Munitions.

Attachment 6 – AFRPA Response to Regulator and Public Comments

**State of California Central Valley Regional Water Quality Control Board (CVWB)
comments dated 21 September 2011 on the
Draft Final Finding of Suitability to Transfer for Parcel G,
Former Mather Air Force Base, CA**

GENERAL COMMENTS

CVWB General Comment 1: Discussions during the Mather BRAC Cleanup Team (BCT) Meeting on 31 August 2011 suggested that there might be a disagreement between the Department of Fish and Game (DFG) and the Air Force with regards to the protectiveness and/or monitoring requirements at IRP Site OT087 (Skeet and Trap Range), potentially resulting in an informal or formal dispute.

It is not clear how this FOST can move forward if this question has not been resolved. CERCLA 120(h)(3)(A)(ii)(I) warrants that all remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the property has been taken, or has been demonstrated to be operating property and successfully, before the date of transfer. Please address this issue.

Air Force Response: As described in the FOST, the remediation of Site OT-87 has been completed and that remedy is protective. No comments or objections related to the protectiveness of Site OT-87 have been received. Should a Party choose to initiate a dispute, it will be addressed as dictated by the Federal Facility Agreement for Mather.

CVWB General Comment 2: Section 4 indicates that a perchlorate- and TCE-containing groundwater plume, originating from the Inactive Rancho Cordova Test Site (IRCTS), has been detected in the northern area of the property west of Mather Lake. The IRCTS project has installed and is operating one extraction well on the Parcel G property.

Please indicate whether deed restrictions and a State Land Use Covenant for this deeper groundwater plume will be in place to prohibit the installation of groundwater wells or extraction of groundwater, other than for remediation and monitoring, in the area of the IRCTS plume.

Air Force Response: The Air Force has committed to inserting certain environmental restrictive covenants in its deeds related to the AC&W Plume, but has no plans to implement similar restrictions for property overlying the IRCTS plume. The County's well ordinance requires CVWB consultation for any new wells within 2000 feet of the IRCTS plume.

Attachment 6 – AFRPA Response to Regulator and Public Comments

CVWB General Comment 3: The document should include a figure that shows the entire former base and the location of Parcel G. Please also include a figure that shows the location of the IRCTS groundwater plume as it overlaps Parcel G.

Air Force Response: A figure has been added showing the location of the IRCTS groundwater plume where it extends beneath Parcel G.

CVWB General Comment 4: Review the comments on the Draft Final Supplemental Environmental Baseline Survey, Parcel G and revise the Draft Final FOST, as appropriate.

Air Force Response: The FOST has been revised to reflect responses to comments on the SEBS, and vice versa.

CVWB General Comment 5: This agency should be referenced as 'Central Valley Regional Water Quality Control Board' the first time it appears in the text and referenced as 'Central Valley Water Board' thereafter. Please remove the acronyms 'CVRWQCB', 'RWQCB', or 'CVWB' from the document.

Air Force Response: It is judged impractical to spell out the agency name throughout the text and this comment response section. Therefore this document uses CVWB, the most recently requested acronym, in the text and in this comment response section.

CVWB General Comment 6: Please consider double-siding the final version of this document.

Air Force Response: The Air Force will consider double siding where practical.

CVWB General Comment 7: It is not clear why the term 'waste discharge requirement' is listed twice in the List of Acronyms on Page iv. Please either explain or remove the redundant listing.

Air Force Response: The redundant entry has been removed.

SPECIFIC COMMENTS

CVWB Specific Comment 1: The first paragraph in Section 5.2, Environmental Restoration Program, on Page 13 states that the most recent groundwater monitoring data for STSW-170A from 2009 indicated a perchlorate concentration of 627 µg/L and a TCE concentration of 5 µg/L. This paragraph should be updated to reflect that this well was last sampled in June 2011.

Attachment 6 – AFRPA Response to Regulator and Public Comments

Air Force Response: The FOST has been updated to cite the most recent sampling data available for the IRCTS Plume.

CVWB Specific Comment 2: Please provide a legible version of Attachment 8, the public notice for the Parcel G FOST.

Air Force Response: A legible version of Attachment 8, the public notice for the Parcel G FOST, has been provided in the FOST.

Attachment 6 – AFRPA Response to Regulator and Public Comments

**U.S. Environmental Protection Agency (U.S. EPA)
comments dated 17 Oct 11 on the
Draft Final Finding of Suitability to Transfer for Parcel G,
Former Mather Air Force Base, CA**

U.S. EPA Comment 1: FOST Section 1.2 should be reviewed and updated with the most current list of documents including new AR#s if available. Is this list supposed to be in chronological order? It seems that some documents are out of order. There appears to be a double listing with items 44 and 48. Item 50 VSI should be fully referenced with an AR#. Section 1.2 should be updated with current list of documents including:

- Final SEBS,
- the most recent Annual Groundwater Monitoring Report ,
- Phil Mook's Letter dated October 19, 2011,
- Final OPS report(s),
- EPA's OPS concurrence letter,
- Final or Draft Biological Opinion,
- Final Mather Lake ESS Report
- Any applicable site closure reports

Air Force Response: Section 1.2 has been listed chronologically and updated with the most current relevant documents, items listed in the comment, and where applicable, online AR document numbers. The duplicate entry for item 44 has been deleted and more complete reference information has been provided for item 50. Note that the only OPS report that is relevant to Parcel G is the 1998 OPS report for the AC&W Plume (item 26) and the EPA OPS concurrence letter is listed (item 27). The visual site inspection reports are not CERCLA documents considered or relied upon to make decisions on cleanup, and are therefore not included in the Administrative Record.

U.S. EPA Comment 2: The FOST should include new figures that show where ICs will be implemented. The existing figures do not clearly show the boundaries for IC implementation.

Air Force Response: The figures in the FOST have been revised to show where ICs are or will be implemented.

U.S. EPA Comment 3: Section 4 Page 7, This section should include a full description for Mather Lake and Site 87; including a summary of the RI/FS, MMRP, selected remedy, current status of the remedy (environmental condition).

Air Force Response: Section 4 has been revised to include a summary description of both CERCLA Site 87 and MMRP Site AOC 597 (Mather Lake Practice Grenade Training

Attachment 6 – AFRPA Response to Regulator and Public Comments

Area), and a summary of the site characterization, remedy evaluation and selection, and environmental condition for Site 87. A summary of the MMRP clearance action and current environmental condition has been added for AOC 597, for which there is no corresponding equivalent to an RI/FS report.

U.S. EPA Comment 4: Section 4 Page 7, This section should describe the remedy for Site 87 including the small mammal survey and the potential need for additional monitoring at the site.

Air Force Response: Section 4 has been updated as requested.

U.S. EPA Comment 5: Section 4 Page 8, The fourth paragraph on page 8 describes the RWQCB cleanup at ST-48. This cleanup should be described in more detail.

Air Force Response: The description of tank removal has been revised to provide more detail.

U.S. EPA Comment 6: Section 4 Page 9, The last sentence in Section 4.0 is out of place and should be moved to the third paragraph of the section.

Air Force Response: The requested revision has been made.

U.S. EPA Comment 7: Draft Final FOST P. 10, Section 5.2: This section needs to be reorganized with sub-sections or headings. The title of section 5.2 does not reflect what is in the section.

Air Force Response: Section 5.0 is Deed Restrictions and Notifications and as described in Section 5.0, the subsections identify applicable deed restrictions or specific notifications, including the fifteen IRP sites addressed under the Environmental Restoration Program, Section 5.2. Section 5.2 has been revised to provide a new heading and subheadings as suggested.

U.S. EPA Comment 8: Draft Final FOST P. 10, Section 5.2: The first paragraph in this section describes 15 IRP Sites on the Property. It would be helpful to have a table showing all of the sites with the current site status, type of contamination (soil or groundwater) and selected remedy if applicable. This table should also clarify if deed notifications or restrictions are required for the 3 IRP sites.

Air Force Response: A summary table has been added as suggested.

Attachment 6 – AFRPA Response to Regulator and Public Comments

U.S. EPA Comment 9: Draft Final FOST P. 13 - 16, Section 5.2: These pages describe the deed covenants and ICs. It would be helpful to organize these pages into separate subsections for the IRP Sites, Groundwater Contamination, and Site Access Issues, etc.

Air Force Response: Section 5.2 is organized by operable unit and then by site as appropriate as that is how the governing documents are organized. The section has been revised to include subtopic headings to identify various types of ICs and maintenance of access.

U.S. EPA Comment 10: Draft Final FOST P. 13 - 16, Section 5.2: The Final Mather Lake ESS Report includes ICs and land use restrictions that should be included in this section. The MMRP investigation results should be described in this section.

Air Force Response: Section 5.2 has been revised to describe the clearance activities completed for this MMRP area of concern (AOC), and to describe the notifications/restrictions/recommendations from the DDESB approved NFA ESS Report, which are currently in place and those to be implemented upon property transfer.

U.S. EPA Comment 11: Section 5.2, page 14, first bullet for Site WP-12: This bullet states that the grantee will not install wells for any purpose other than remediation or monitoring. This language is confusing and should be revised and clarified. I assume this means that the grantee may need to install remediation wells in future but I'm not sure. This section should reference the local well installation requirements. The FOST should state that the deed will include notification of the Sacramento County Well Ordinance and the Aerojet plume beneath the Property. This section should and state that all wells and subsurface excavations need to be preapproved by the Air Force, EPA & State.

Air Force Response: As indicated in the FOST, the language is consistent with the restrictive covenants described in the AC&W ROD ESD for ICs. The first bullet prohibits well installations or groundwater extraction by the owner except as specified. The language is a common and standardized groundwater use prohibition that has been established in the decision document approved by the Air Force and agencies so no change was been made.

Consistent with commitments made in the Final FOST for Parcel M, the Air Force will place a notification in its deed(s) to alert the property recipient of the Aerojet plume beneath the property and the need to comply with the Consultation Zone Requirements in the Sacramento County Well Ordinance. Actual compliance with the requirements of the well ordinance is the responsibility of the property owner.

Attachment 6 – AFRPA Response to Regulator and Public Comments

U.S. EPA Comment 12: Section 5.6, Asbestos Containing Material, page 22; The sections on ACM state that the responsibility of ACM abatement is on the Transferee. EPA prefers that the Air Force abate the ACM before transferring the property.

Air Force Response: The Air Force abated all ACM that was friable prior to leasing the property to the County. No abatement was necessary in Parcel G. The terms of the Parcel G lease require the lessee to maintain the buildings. There is no ACM identified as friable in the 2011 VSIs. The general language in this section reflects Air Force policy to allow the lessee, who will also be the grantee of the deed, to defer the correction of any maintenance deficiencies until after the property transfer rather than delay property transfer until ACM abatement has occurred. This also allows the grantee to address ACM during building demolition rather than being forced to unnecessarily abate unoccupied buildings prior to transfer.

U.S. EPA Comment 13: Section 5.8, LBP, page 24; EPA prefers that the Air Force abate the LBP containing material before transferring the property.

Air Force Response: The general language in this section reflects Air Force policy to allow the lessee who is also the grantee of the deed, to defer the correction of any maintenance deficiencies until after the property transfer rather than delay property transfer until LBP abatement has occurred. This also allows the grantee to address LBP during building demolition rather than being forced to unnecessarily abate unoccupied buildings prior to transfer.


U.S. EPA Comment 14: Section 7.0 Regulator Coordination: This section should say that transfer of the property will not occur until USEPA and DTSC have an opportunity to review and provide comments on the environmental notifications and restrictions in the draft Deed.

Air Force Response: The Section 7 text has not been revised as requested because this commitment is already made by the Air Force in its RODs, ROD Amendments, the ESDs, or other decision documents that add ICs to the remedies. The Air Force will certainly reference these final coordinations in Section 7.0 and attach these Response to Comment pages to the Final FOST.

Attachment 7 – FOST Concurrence Related Correspondence

Attachment 8 – FOST Related Notices and Correspondence

This notice ran in the Sacramento Bee Newspaper on August 9, 2010

Former Mather Air Force Base
Public Comment on Air Force's Intent to
Sign Finding of Suitability to Transfer 

The Air Force Real Property Agency intends to sign a Finding of Suitability to Transfer (FOST) document for Parcel G at the former Mather Air Force Base. The Property is comprised of 1,485 acres east of the runway and includes Mather Lake and associated recreational area, the Aircraft Control and Warning (AC&W) area, the Weapons Storage Area (WSA), and the large tract of open space between these areas. It will be transferred to Sacramento County by deed through different mechanisms.

Approximately 853 acres will transfer via a Parks and Recreation public benefit conveyance (PBC). Approximately 500 acres will transfer via an economic development conveyance (EDC), a Parks and Recreation PBC or a conservation conveyance. The remaining 132 acres will transfer via an EDC or a Parks and Recreation PBC. The anticipated use of the Property is for a public park, recreational facilities, a long-range radar facility, habitat conservation, and commercial development.

The FOST is the Air Force's determination that the property is suitable for transfer and is based on an extensive review of the environmental condition of the property in consultation with federal and state environmental regulatory agencies.

The property is being conveyed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 120(r)(3). CERCLA remedial actions necessary to protect human health and the environment have been completed. The property became available for transfer as a result of the Base Closure and Realignment Act of 1988 and the subsequent closure of Mather.

The public is invited to review and submit comments on the proposed land transaction during the 30-day comment period from August 9 to September 8, 2010.

A copy of the draft FOST and supporting documents are available for public review at:

Mather Information Repository
 3411 Olson Street, McClellan, CA 95652
 Hours: 9 a.m. to 3 p.m. Monday - Friday
 For an appointment, call (916) 643-1250, ext. 201

Or online at: <https://afprar.jackland.af.mil/ar/docsearch.aspx>.
 Select "Mather" as the base and search for document ID #2825.

The Air Force will consider written comments received by on or before June 30, 2010. Send comments or questions to:
Mr. Douglas Fortin
 Air Force Real Property Agency
 3411 Olson St.
 McClellan, CA 95652
 Or email at douglas.fortin@us.af.mil

For more information contact Brian Sytma, Community Relations, Air Force Real Property Agency, 3411 Olson Street, McClellan, CA 95652; phone: (916) 643-1200 ext 207; or email: brian.sytma.2.cfo@us.af.mil.

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