



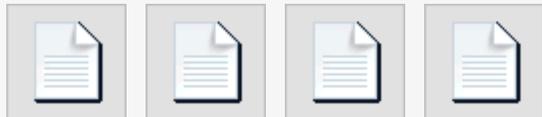
Military Digest, Vol 77, Issue 7

Wednesday, January 12, 2011 1:20 PM

From: "military-request@lists.cpeo.org" <military-request@lists.cpeo.org>

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4 Files (14KB)



[CPEO-MEF] Re: [CPEO-I] [CPEO-MEF] [CPEO-MEF]

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Today's Topics:

1. VOCs: Bannister Federal Complex vapor intrusion (Lenny Siegel)
2. Re: VOCs: Bannister Federal Complex vapor intrusion (Lenny Siegel)
3. MUNITIONS, FUDS: Ft. Hancock (NJ) investigation (Lenny Siegel)
4. Newport Chemical Depot (IN) comments by Hoosier Environmental Council (Lenny Siegel)

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Military mailing list

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Forwarded Message: [CPEO-MEF] VOCs: Bannister Federal Complex vapor intrusion

[CPEO-MEF] VOCs: Bannister Federal Complex vapor intrusion

Tuesday, January 11, 2011 1:47 PM

From: "Lenny Siegel" <lsiegel@cpeo.org>

To: "Military Environmental Forum" <military@lists.cpeo.org>

Vapor Intrusion Health Risks at Bannister Federal Complex Not a Concern for Buildings 50 and 52, Unknown for Other Buildings

U.S. Environmental Protection Agency Office of Inspector General  
11-P-0048  
January 5, 2011

Testing at Bannister Federal Complex in February 2010 revealed elevated levels of volatile organic compounds (VOCs) in the soil vapor beneath the foundations of buildings 50 and 52. EPA Region 7 assisted GSA in evaluating the vapor intrusion risk for these buildings. Only trichloroethylene vapors were observed to be intruding into building 50 from the contaminated ground water. Building 50 contains office space and building 52 has a child care facility.

Region 7 assessed the health risk from inhaling indoor air in the two buildings in accordance with EPA risk assessment

procedures. The indoor air chemical concentrations were below acceptable risk levels for both short- and long-term exposure for the 14 VOCs measured and, therefore, are not a health concern. As a precaution, Region 7 recommended and reviewed the installation of soil vapor removal systems in both buildings in February 2010. Subsequent testing in March 2010 showed that contaminant levels in the soil vapors beneath both buildings were reduced. Trichloroethylene levels in the indoor air of building 50 were also reduced.

Although Region 7 conducted its assessment in accordance with EPA-approved procedures, additional actions would provide a more comprehensive picture of the chemical hazards in the indoor air and ground. These actions include testing for additional VOCs and assessing total VOC exposure levels in the buildings. Not all of the other Bannister Federal Complex buildings with underlying or nearby contaminant plumes have been assessed for soil vapor intrusion. As a result, the public health risks in those buildings have not been determined.

For the entire report, go to <http://www.epa.gov/oig/reports/2011/20110105-11-P-0048.pdf>

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Lenny Siegel  
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Forwarded Message: Re: [CPEO-MEF] VOCs: Bannister Federal Complex vapor intrusion

Re: [CPEO-MEF] VOCs: Bannister Federal Complex vapor intrusion

Tuesday, January 11, 2011 1:56 PM

From: "Lenny Siegel" <[lsiegel@cpeo.org](mailto:lsiegel@cpeo.org)>  
To: "Military Environmental Forum" <[military@lists.cpeo.org](mailto:military@lists.cpeo.org)>

Unfortunately, this report includes almost no sampling data.

On page 10 (p. 16 of the PDF) it calculates the acceptable TCE exposure level in indoor air for young children to be 2.5 micrograms per cubic meter (ug/m3). Presumably, the number is so high (compared to residential indoor air action levels elsewhere of 1 ug/m3) because children are present less than 40 hours per week. But if EPA's draft toxicity assessment for TCE is finalized without substantial changes, both numbers could drop substantially.

Fortunately, the maximum indoor air concentration found in the building with the day care center was .42 ug/m3.

Lenny

Lenny Siegel wrote:

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Tuesday, January 11, 2011 4:55 PM

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To: "Military Environmental Forum" <[military@lists.cpeo.org](mailto:military@lists.cpeo.org)>

Army Corps scans Fort Hancock for munitions  
Study looks for unexploded ordnance on Sandy Hook

BY ANDREW DAVISON  
Atlanticville  
January 13, 2011

The U.S. Army Corps of Engineers (USACE) will conduct a remedial investigation and feasibility study to determine if a significant number of unexploded munitions remains around Fort Hancock and Sandy Hook.

Gregory Goepfert, USACE project manager, explained the upcoming study at a public information meeting on Jan. 6.

"Recently, Congress has had the interest to return to some of these sites that have been used for ordnance and investigate them fully to ensure that there are no hazards apparent to public use of these properties," Goepfert said.

Fort Hancock was the U.S. Army's first official ordnance proving ground, Goepfert said.

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For the entire article, see

[http://atlanticville.gmnews.com/news/2011-01-13/Front\\_Page/Army\\_Corps\\_scans\\_Fort\\_Hancock\\_for\\_munitions.html](http://atlanticville.gmnews.com/news/2011-01-13/Front_Page/Army_Corps_scans_Fort_Hancock_for_munitions.html)

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Forwarded Message: [CPEO-MEF] Newport Chemical Depot (IN) comments by Hoosier Environmental Council

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Tuesday, January 11, 2011 7:16 PM

From: "Lenny Siegel" <[lsiegel@cpeo.org](mailto:lsiegel@cpeo.org)>

To: "Military Environmental Forum" <[military@lists.cpeo.org](mailto:military@lists.cpeo.org)>

December 18, 2010

Ms. Cathy Collins

Engineer

Newport Chemical Depot

PO Box 160

Newport, IN 47966

RE: Comments on Environmental Assessment and Draft Finding of No Significant Impact for Disposal and Reuse of Newport Chemical Depot

Dear Ms. Collins,

The Hoosier Environmental Council submits the following comments on the EA and draft FNSI referenced above.

Finding of No Significant Impact

A finding of no significant impact is not appropriate for the proposed action, given the absence of key reuse information in the Environmental Assessment, and the provisions of the Newport Chemical Depot Reuse Authority's (NeCRDA) Reuse Plan which allows the destruction of an important natural resource present at the facility. Therefore, the Army should find that there will be significant environmental impact from the disposal and reuse of the property, and prepare a full environmental impact statement.

1. A high intensity reuse option has been proposed for a portion of the facility which would have major impact on the environmental resources at the Newport facility and surrounding area. This proposed reuse project involves construction and operation of a coal liquefaction plant. This would be a major industrial facility, with potential impacts to air quality, water quality, disturbance or destruction of forest, wetlands, and prairie, and a dramatic change in the nature of the property. This possible type of reuse activity was mentioned in the NeCRDA's reuse plan, but is inconsistent with the low intensity reuse and medium-low intensity reuse alternatives evaluated in the Environmental Assessment. The EA states, "Achieving conversion and redevelopment goals would, at build-out, most closely resemble an Medium-Low (ML) scenario." (Page 3-10).

Such a major industrial facility would be accurately characterized as either a medium-high intensity, or high intensity reuse, both of which were deemed "impractical" in the EA (page 3-6). The EA states, "No land use conflicts would be expected from implementing the reuse plan." (page 4-6). A major industrial operation such as a coal liquefaction plant would not only conflict with other planned uses within the Newport property, but also with the low-intensity land use practices and economic activity occurring in the surrounding areas. Desirable and compatible economic development, such as high-tech or life-sciences industries would be unlikely to locate nearby a major polluting industrial facility.

2. Neither the NeCRDA reuse plan, nor the Army's disposal action, provide for protection of the 336 acre black soil tallgrass prairie area, which is a rare and biologically valuable natural area deserving of permanent protection. Instead, the reuse plan includes most of this prairie area in an agricultural and forestry designation, meaning it could be plowed and planted to row crops in the future. The EA acknowledges this, stating, "some loss of the restored prairie areas would be expected." (page 4-36) Contrary to the EA's statement, "tallgrass prairie" is not an agricultural reuse.

It is illogical, and inconsistent with a goal of the NeCRDA reuse plan, to include a high quality natural area such as this black soil tallgrass prairie area in a reuse category that may allow its destruction. It is unimportant that this prairie area is restored prairie, because it represents, now and in the future, a rare and important natural community that is worthy of preservation. Given that this prairie area constitutes less than 5% of the total Newport area, and that more than 3,000 acres would remain for business and technology reuse, it is wholly reasonable and prudent to permanently protect this area.

The Army's disposal action should require that this prairie area be included in the "natural areas and open space" reuse classification, or otherwise assure its permanent protection through an easement or other encumbrance.

3. The EA's evaluation of public benefit conveyance outcomes is limited and incomplete. The Army should conduct a thorough review of the Notices of Interest applications, and reach an independent conclusion on the merits of these requests and whether they should be granted.

#### Conclusion

The EA for the disposal and reuse of Newport Chemical Depot is inadequate for the following reasons: a limited analysis of public benefit conveyances as reuse alternatives; the failure to fully evaluate the disposal action's effect on an important natural resource, the tallgrass prairie area; and, the lack of evaluation of major industrial reuses that are being considered for the Newport property by other interests. These deficiencies result in the Army's Environmental Assessment failing to provide a sufficient level of NEPA analysis. The Army should reach a finding of significant impact for the Newport Chemical Depot disposal action and prepare a full environmental impact statement which evaluates industrial reuses and their compatibility with the medium-low and low intensity reuses contemplated by the NeCRDA reuse plan and EA. The EIS should also include a disposal alternative which provides for full protection of Newport's important natural areas and habitats-- forests, prairie, and wetlands.

Sincerely,

Tim Maloney  
Senior Policy Director  
Hoosier Environmental Council  
3951 N. Meridian St., Suite 100  
Indianapolis, IN 46208

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