

Finding of Suitability to Transfer Environmental Suitability of Readiness Centers Scammon Bay, Alaska

Alaska Army National Guard

P.O. Box 5800

JBER, AK 99505



July 2019

FINDING OF SUITABILITY TO TRANSFER
(FOST)
Scammon Bay Readiness Center
Scammon Bay, Alaska
14 February 2019

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of the Scammon Bay Readiness Center (RC) (henceforth referred to as the “Property”) located in Scammon Bay, Alaska for transfer from the Federal Government to an entity to be determined through the Federal Real Property Disposal Process. The Alaska Army National Guard (AKARNG) intends to terminate the license agreement with the U.S. Army and thereafter the Army will transfer the Property in fee consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy.

2. PROPERTY DESCRIPTION

The Property consists of a 0.34-acre parcel of land located within the village of Scammon Bay, Bethel Recording District, Alaska in Section 10, Township 20 North, Range 90 West of the Seward Meridian. Scammon Bay is located in western Alaska about 150 miles northwest of Bethel. The approximate center of the Property is at 61°50’33’’ North latitude, 165°34’44’’ West longitude. The village of Scammon Bay is situated on the south bank of the Kun River, one mile from the Bering Sea.

2.1 Property History

On 5 May 1959, the U.S. Department of the Interior, Bureau of Land Management (BLM) issued a Notation on Land Record No. 0232188 under provision of land record 44-LD513 for the U.S. Army Corps of Engineers (USACE) to acquire 0.78 acres in Scammon Bay (which was also notated as 0.69 acres on contemporary surveys). This land holding was reduced to 0.34 acres under the Alaska Native Claims Settlement Act on 10 October 1984, because the Scammon Bay school site was in partial conflict with the Property.

Jurisdiction over the parcel was transferred from the BLM to the U.S. Fish and Wildlife Service (USFWS) in 1986 as part of the newly established Yukon Delta National Wildlife Refuge, and the case file was re-designated from F-23218 to H-249-YD. The appropriation was therefore co-administered by the USACE and the USFWS.

On 30 October 2000, license DACA85-3-01-04 was issued by the Secretary of the Army to grant the State of Alaska, Department of Military and Veteran's Affairs (DMVA)

license to use and occupy for training and support of the AKARNG 0.34-acre parcel in Scammon Bay; it should be noted that the AKARNG occupied the Property starting in 1959.

2.2 Legal Description

A tract of land located within Lot 2, U.S. Survey 4099 more particularly describe as: Beginning at a point for corner No. 1, identical with corner No. 3 U.S. Survey 4099. From corner No. 1, by metes and bounds, N 83°29'00" E, 149.82 feet, to corner No. 2, a point on the 3-4 line of U.S. Survey 4099; S 6°31'00" E, 99.20 feet, to corner No. 3, a point on the line between lots 2 & 3 of U.S. Survey 4099, S 83°29'00" W, 149.82 feet, to corner No. 4, a point on the 6-2 line of U.S. Survey 4099, N 6°31'00" W, 99.20 feet, to corner No. 1, the true point of beginning, containing 0.34 acres, more or less.

2.2 Property Improvements

The 0.34-acre parcel is improved with two single-story RC's. An old 20-foot by 60-foot prefabricated Butler RC was built in 1959. This RC building consists of corrugated metal siding, a metal roof and is elevated on a wood skid foundation. It is located on the western half of the Property. A new 30-foot by 50-foot prefabricated RC was built in 2002. This RC building consists of a metal-frame, siding and roof, and is elevated above ground using an aluminum Triodetic® multipoint foundation. It is located on the eastern half of the Property. Other improvements on the Property include two permanently closed 1,500-gallon double walled aboveground storage tanks (ASTs), a container express (Conex) storage box, and a hazardous materials storage locker. Photos of the Property and improvements can be found in Appendix E of the 2017 Environmental Baseline Survey (EBS).

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the property was made through the development of an EBS dated 29 June 2017 and prepared in accordance with American Society for Testing and Materials (ASTM) D6008-96 (2014). The information provided is a result of a complete search of agency files during the development of an EBS (Attachment 2). The EBS was prepared by U.S. Army Public Health Center (APHC) on 27 June 2017 for the U.S. Army National Guard (ARNG) Directorate. Additional documents relating to environmental impact analysis and site restoration were consulted. National Environmental Policy Act (NEPA) analysis includes a Record of Environmental Consideration for the Property transfer (Attachment 3).

4. ENVIRONMENTAL CONDITION OF PROPERTY

The Department of Defense (DOD) established seven (7) Environmental Condition of Property (ECP) categories, as defined in standard ASTM D5746-98 (2016), and in accordance with the policy established in Army Regulation (AR) 200-1, for the purpose of meeting CERCLA 120(h) requirement during property transactions by a federal agency. These seven ECP categories are defined in Attachment 2. For the subject Property, the only applicable ECP category is as follows:

ECP Area Type 2: An area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred.

4.1 Storage, Release or Disposal of Hazardous Substances

Small quantities of hazardous substances and petroleum products associated with facility and equipment maintenance were probably stored within the RC buildings, Conex, and hazardous materials storage locker. During a June 2018 site visit, both RC buildings were inspected for hazardous materials. Small quantities of cleaning and maintenance products were identified and removed off the Property. The hazardous materials storage locker was open and empty.

In accordance with 40 CFR Part 373, there is no evidence that hazardous substances were stored, released, or disposed of on the Property in excess of the reportable quantities set forth in 40 CFR Part 302.4 reportable quantities.

4.2 Petroleum and Petroleum Products

Petroleum substances have been stored on the Property and releases have occurred. Historical aerial imagery from 1968 to 1975 show a cluster of drums stored southeast of the old RC and a second cluster stored on the west side of the old RC. Based on available anecdotal evidence regarding historical practices, the drums were likely 55-gallons in size and contained petroleum products for heating. However, aerial imagery from 1994 show all of the drums have been removed from the Property.

Heating oil was formerly stored on the Property in aboveground storage tanks (ASTs) at each of the RC buildings. A single-walled, non-diked AST with an estimated capacity of 1,500 to 3,000 gallons was located south of the old RC from 1960-1993. However, previous reports have conflicting information regarding the exact size and location of this AST. This former AST was originally filled via a fuel pipeline extending from the main city fuel line; the main city fuel line connected a hillside city tank farm south of the Property to various village buildings. The AST and fuel pipeline were reportedly removed from the Property in 1993. There is no information available about when the ASTs and/or fuel pipeline were removed.

The old RC was rehabilitated in 1993 and a newer 1,500-gallon AST, labeled FOT-1, was installed. At the new RC, a 1,500-gallon AST was installed north of the building in 2002. Fuel was transported from the city fuel tanks via 55-gallon drums and was pumped into the ASTs. Fuel was transferred from the two 1,500-gallon ASTs and their respective 10-gallon day tanks within each RC building via 1-inch diameter steel piping. Both of the 1,500-gallon ASTs on the Property have been permanently closed in accordance with 40 CFR §112.2 effective 2 March 2017. The AST closure included the following steps:

- Draining of liquid from the AST and connecting lines;
- Disconnection of connecting lines and piping;
- Closure and/or locking of all valves (except for ventilation valves) and fill locations; and
- Labeling each AST with a sign stating that the AST is permanently closed including the date of closure

During an Environmental Compliance Assessment Survey (ECAS) conducted at the Property in 1992, it was reported that there were two partially filled drums leaking gasoline onto the ground surface north of the old RC. This location, along with three other areas of concern (AOC) were identified at the Property during a 1995 Preliminary Assessment (PA) and Site Investigation (SI) by CH2M HILL. These three AOCs include the footprint of the 1,500-gallon AST at the old RC, heating oil contamination associated with the former 3,000-gallon AST at the old RC, and the former fuel transfer pipeline for the 3,000-gallon AST. No other petroleum releases have been reported.

There are no underground storage tanks (USTs) on, or adjacent to, the Property. There is no evidence of USTs formally on the Property, or of a petroleum release from USTs on the Property. Other than the aforementioned ASTs, there is no evidence of petroleum product containers in excess of 55-gallons being stored on the Property for one year or more.

4.3 Polychlorinated Biphenyls (PCBs)

No pole-mounted transformers or hydraulic equipment was observed at the Property. No visual, documented, or anecdotal evidence of any storage, use, or disposal of PCB-containing equipment was identified in the 2017 EBS.

4.4 Asbestos Containing Material (ACM)

Ogden Environmental and Energy Services Company, Inc. conducted an asbestos survey at the old RC in April 1996. The interior finish materials at that time included rolled felt flooring, and gypsum board walls and ceiling, which were later removed during early 1980's renovations. None of the materials collected for analysis in 1996 contained ACM.

4.5 Lead-based Paint (LBP)

LBP is a hazard in residential properties constructed prior to 1978. No LBP surveys have been conducted at either Scammon Bay RCs. The old RC was constructed in 1959 and may have originally contained LBP. The 2017 EBS states during 1980s renovation work on the building, the original walls, ceiling, doors, and windows were replaced with modern materials. Previous investigators concluded that it is unlikely that LBP remains within the structure. It is yet still possible that LBP may be present on parts of the building that were not replaced. The new RC was constructed in 2002 and is not expected to contain LBP. No former or current activities that could generate lead dust were identified on the Property during recent site visits.

4.6 Radiological Materials

There is no evidence that radioactive material or sources was stored or used on the Property.

4.7 Radon

Radon testing has not been conducted on the Property. Both of the RC buildings are on a raised foundation; the open crawl space beneath the building would preclude entrapment of radon. The EPA radon map indicates that Scammon Bay is in the western Alaska Bethel Census Area Radon Zone 3, with a predicted average indoor radon screening levels of less than 2 picocuries per liter (pCi/L). The action level for indoor radon is 4 pCi/L.

4.8 Munitions and Explosives of Concern (MEC)

Firearms and small arms rounds may have been stored in a vault within one or both of the RC buildings. Based on a review of existing records and available information, there is no anecdotal or physical evidence that munitions are present on the Property or disposed of improperly.

The term “MEC” means military munitions that may pose unique explosive safety risks, including: (A) unexploded ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (B) discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (C) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

4.9 Environmental Remediation Sites

In section 4.4 of the 2017 APHC EBS, previous environmental assessments on the Property are described as the following:

- In 1995, CH2M HILL conducted a PA and SI at the Scammon Bay RC. Four areas of concern (AOC) were identified. AOC 1 was identified as the two partially filled 55-gallon drums observed by the ECAS team in 1992. AOC 2 was located at the footprint of the new 1,500-gallon AST situated along the southwest edge of the old RC. AOC 3 was comprised of heating oil contamination found in soils to depths of about four feet along the south side of the old RC and in the vicinity of the former 3,000-gallon AST. AOC 4, the fuel transfer pipeline to the former 3,000-gallon AST, was not found because the Property had been re-graded in this vicinity and no sign of the former pipeline could be observed. Neither AOC 1 nor AOC 2 contained chemicals of concern (primarily petroleum compounds) at levels exceeding applicable regulatory levels. AOC 4 was not investigated because it could not be located. Soils at AOC 3 exceeded cleanup requirements for diesel range organics (DRO), and the Alaska Department of Environmental Conservation (ADEC) required additional delineation of the extent of petroleum contamination at this site following their review of the SI document in 1998.
- In 1998, CH2M HILL conducted a Remedial Investigation (RI), collecting surface and subsurface samples from AOC 3 and from background locations at depths of up to seven feet below ground surface (bgs). The RI results indicated that DRO was the primary contaminant of concern, with up to 15,000 milligrams per kilogram (mg/kg) DRO detected in soils at the site.
- In 2002, Clearwater Environmental, Inc. conducted an Interim Removal Action (IRA) at the Property to implement the remedial actions recommended by the RI. The IRA included removal of 43 tons of contaminated soil to a treatment facility in Washington State, and subsequent collection and analysis of confirmatory soil samples from the excavation. Analytical results for the confirmatory samples indicated that several of the samples exceeded allowable levels for DRO and/or gasoline range organics (GRO).
- The Hoefler Consulting Group conducted an Alternate Cleanup Level (ACL) demonstration in 2005, proposing ACLs of 4,000 mg/kg for DRO and 1,400 mg/kg for GRO. Based on the proposed cleanup levels, investigators recommended removal of an estimated 89 to 133 cubic yard of contaminated soils. The ADEC approved of the ACLs in 2006.
- A Supplemental Site Characterization and Remedial Action (RA) were conducted in 2010, which included the removal of 413 tons of soil containing DRO concentrations greater than 250 mg/kg. Confirmatory sampling conducted on the excavation sidewalls indicated that DRO concentrations remaining in the site soils were less than 250 mg/kg. The contaminated soil was containerized and removed to a landfill in Oregon for disposal, and the excavation was backfilled with clean fill material.

Based on the results of the Final RA report, ADEC determined that cleanup is complete, no further action is required, and the site was closed as of 3 December 2010.

4.10 Other Property Conditions

There are no other hazardous conditions on the Property that present an unacceptable risk to human health and the environment.

5. ADJACENT PROPERTY CONDITIONS

The Scammon Bay Old Bureau of Indian Affairs (BIA) school and tank farm, adjacent to and south of the Property, are located uphill and upgradient from the Property. In August 2014, contamination was discovered downgradient of the former BIA school tank farm at a culvert excavation site. The contamination was found to extend from the ground surface to a depth of at least six feet bgs. A reported 50 cubic yards of soil was removed and clean fill material was added to the culvert site. A phase I Environmental Site Assessment was completed in August 2014 at the old BIA school and tank farm, which identified several Recognized Environmental Conditions in addition to the contamination encountered at the culvert excavation.

However, because surface meltwater or precipitation runoff from the old BIA school brownfields site may flow onto the Property, any remaining petroleum-product surface contamination has the potential to affect environmental quality at the Property. The old BIA school and tank farm site is listed as an active contaminated site in the ADEC Contaminated Sites database. It is not known whether cleanup is required or if any cleanup remediation has been initiated at the site. More information can be found in section 5.2 of the 2017 EBS. There are no other conditions adjacent to the Property that present an unacceptable risk to human health and the environment.

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

There are no other environmental remediation order or agreements applicable to the Property being transferred.

7. REGULATORY/PUBLIC COORDINATION

AKARNG will make this FOST and EBS available to the public for a 30-day review period. AKARNG will notify the public of this action via public notice in appropriate newspaper(s) and will make a copy of the signed FOST available for public review at Anchorage Loussac Public Library (Attachment 4).

The State of Alaska Department of Environmental Conservation were notified of the initiation of this FOST. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate. A copy of the regulatory/public comments will be included as Attachment 4.

The Alaska Department of Environmental Conservation was notified of the initiation of this FOST. The AKARNG has consulted with the Alaska State Historic Preservation Office for this proposed transfer per the National Historic Preservation Act (NHPA). Mitigative measures are in place to address adverse effects of the proposed transfer.

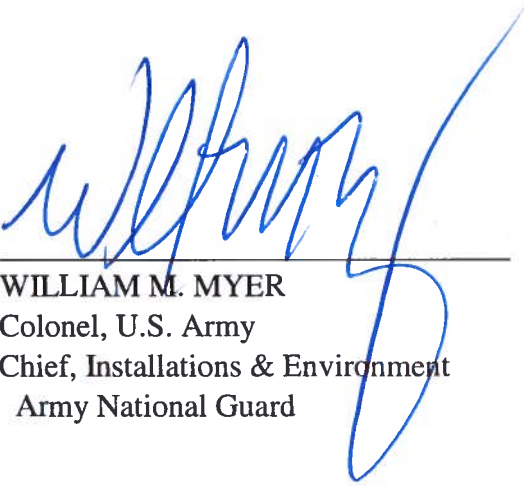
8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The AKARNG analyzed the potential environmental impacts associated with the proposed license termination and transfer of the property in accordance with NEPA. The results of this analysis are documented in the Record of Environmental Consideration (REC) dated 31 October 2017 (Attachment 3). There were no conditions identified in the NEPA analysis considered necessary to protect human health or the environment.

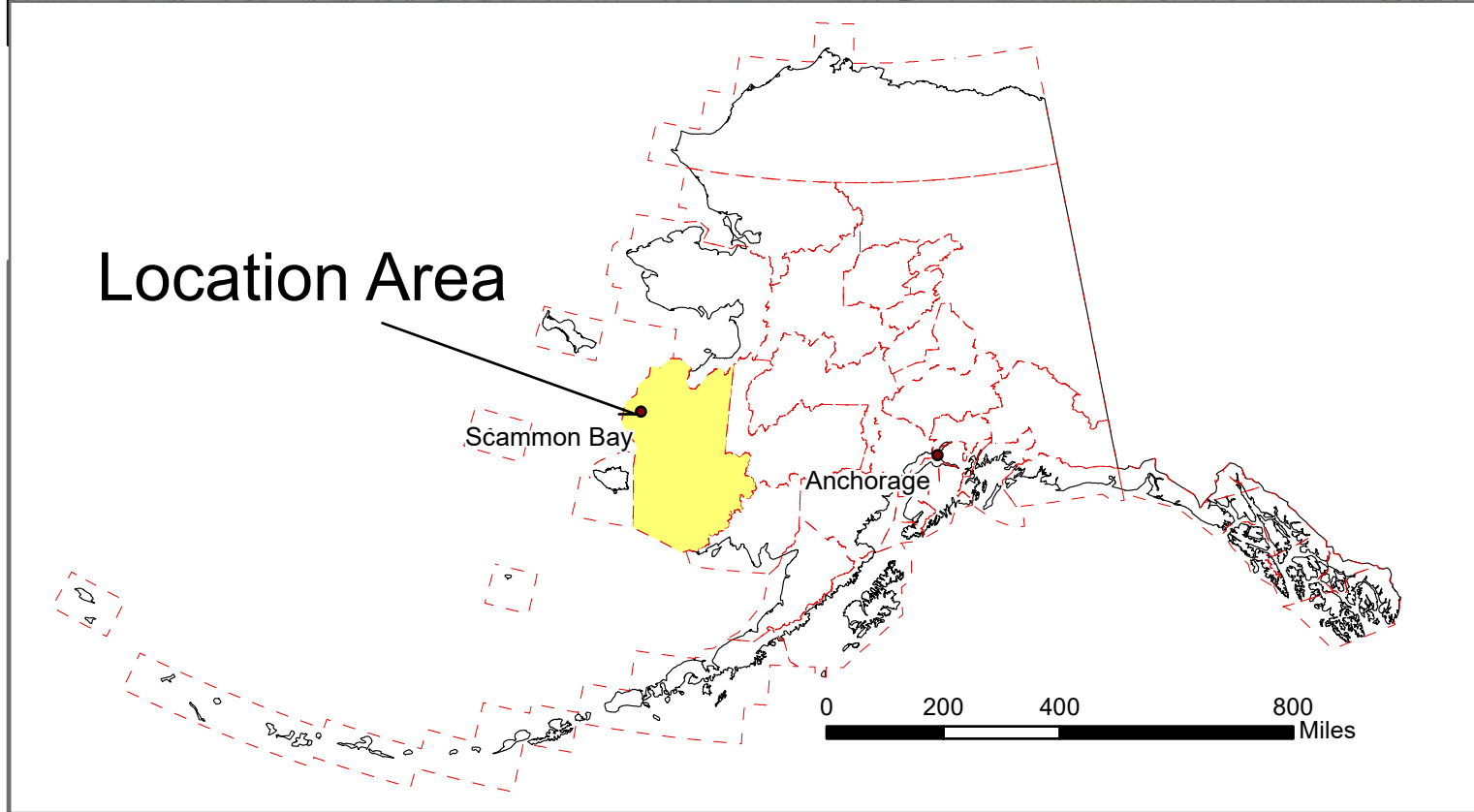
9. FINDING OF SUITABILITY TO TRANSFER

Based on the information above, I conclude that the Property qualifies as CERCLA §120(h)(4) uncontaminated property and is transferable under that section. In addition, AKARNG has met all Department of Defense requirements to reach a finding of suitability to transfer.

15 July 2019
Date


WILLIAM M. MYER
Colonel, U.S. Army
Chief, Installations & Environment
Army National Guard

Attachment 1: Site Map of Property



**FIGURE 1 -
LOCATION MAP**

SCAMMON BAY - ALASKA
ARMY NATIONAL GUARD INSTALLATION AREA
RECORDING DISTRICT: BETHEL

PREPARED BY: AKARNG CFMO ENVIRONMENTAL GIS, 11/16/2018
MAP SOURCES: AKARNG GIS, 2016 DIGITAL GLOBE IMAGERY
PROJECTION: NAD 83 ALASKA ALBERS, LINEAR UNIT: METER



Attachment 2: Environmental Documentation



U.S. ARMY PUBLIC HEALTH CENTER

8252 Blackhawk Road, Aberdeen Proving Ground, Maryland 21010-5403

**ENVIRONMENTAL BASELINE SURVEY NO. S.0050155.3-17
ALASKA ARMY NATIONAL GUARD SCAMMON BAY READINESS CENTER
SCAMMON BAY, BETHEL RECORDING DISTRICT
ALASKA
26 JUNE TO 1 JULY 2017**

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General Medical: 500A, Public Health Survey

EXECUTIVE SUMMARY
ENVIRONMENTAL BASELINE SURVEY NO. S.0050155.3-17
ALASKA NATIONAL GUARD SCAMMON BAY READINESS CENTER
SCAMMON BAY, BETHEL RECORDING DISTRICT
ALASKA
26 JUNE TO 1 JULY 2017

1.0 PURPOSE.

The U.S. Army Public Health Center (APHC) prepared this Environmental Baseline Survey (EBS) report for the U.S. Army National Guard (ARNG) Directorate. The purpose of this EBS was to document the environmental condition of the Alaska Army National Guard (AKARNG) Scammon Bay Readiness Center (RC) (henceforth referred to as the "Property") which is located in Scammon Bay, Bethel Recording District in Alaska, and to identify areas of concern that may impact the suitability of the Property for disposal. The AKARNG plans to divest from the Property and to terminate the license agreement.

2.0 METHODOLOGY.

This EBS was performed following ASTM International D6008-96 (2014), Standard Practice for Conducting Environmental Baseline Surveys. Site reconnaissance was conducted on 27 June 2017. Although many of the EBS development activities may be considered "due diligence" functions, this EBS report is not prepared to satisfy a real property purchaser's duty to conduct an "all appropriate inquiry" to establish an "innocent purchaser defense" to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 107 liability.

3.0 SITE DESCRIPTION AND USE.

The 0.34-acre Property is improved with two Butler-style armory buildings located at the intersection of Kun and Hillside Streets (Figure ES-1). The prefabricated buildings, constructed in 1959 and 2002, have metal siding and metal roofs and contain offices, supply rooms, arms storage, and drill areas. The buildings are each heated by two stoves fed from a 10-gallon indoor day tank. Two 1,500-gallon double-walled aboveground storage tanks store bulk heating fuel outside of the armory buildings. A hazardous materials locker and Container Express storage van are situated at the Property. Prior to initial construction of the RC in 1959, the Property was probably undeveloped.

4.0 ASSIGNMENT OF ENVIRONMENTAL CONDITION OF PROPERTY (ECP) AREA TYPES.

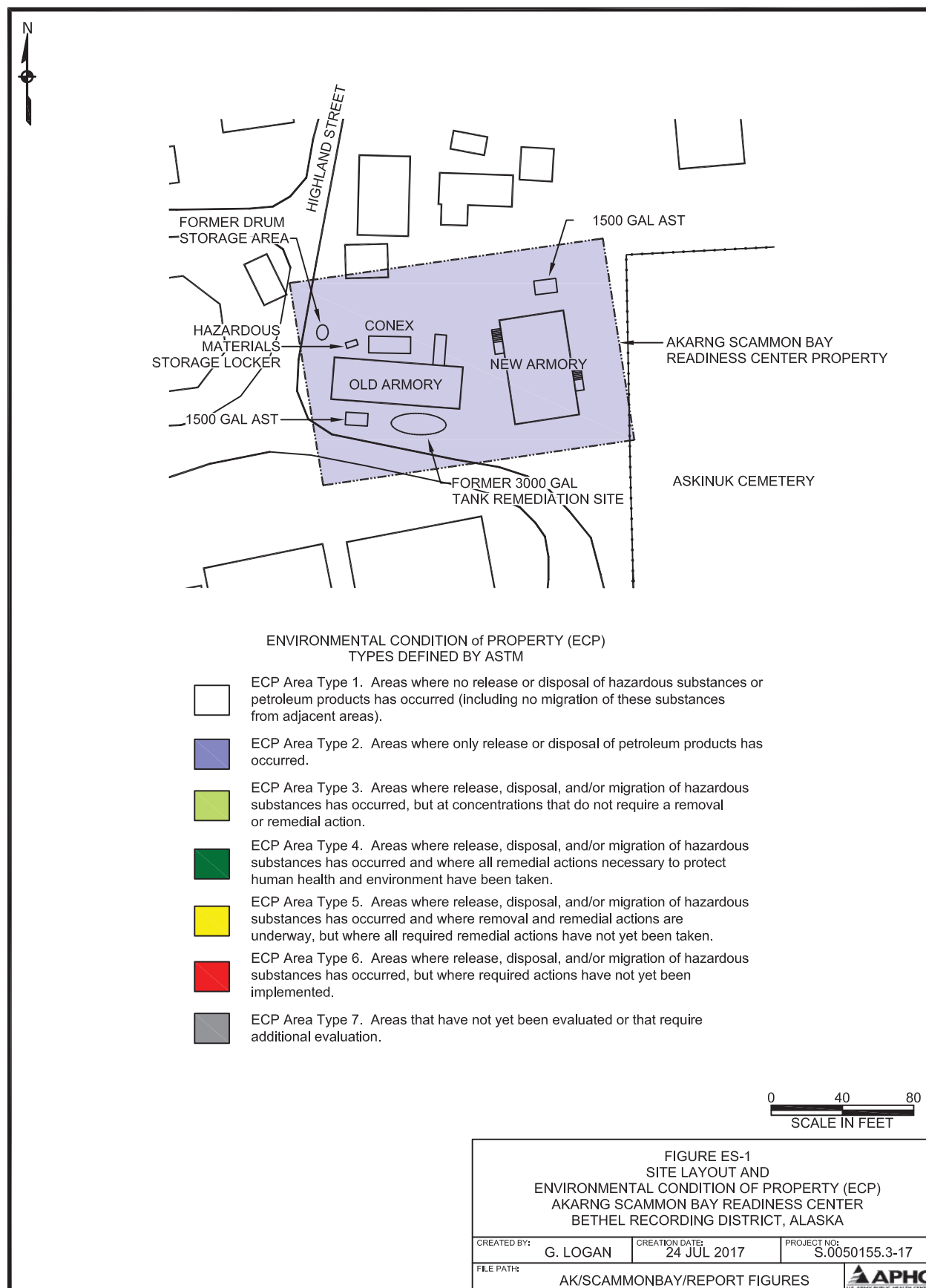
In accordance with ASTM D5746-98 (2016), APHC recommends that the Scammon Bay RC be classified as shown in Figure ES-1.

The recommended classification does not include de minimis conditions that generally do not present material risk of harm to public health or the environment and generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies.

ECP Area Type classifications are recommendations. In accordance with Army Regulation 200-1§15.5.e, the Garrison Commander (or equivalent) is responsible for determining the appropriate ECP Area Types for property being transferred based on the results of the ECP report and actions taken to address contamination.

The recommended classification is ECP Area Type 2, or an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred. Investigation of a fuel spill at the Property followed by removal actions was conducted throughout the 1990s and 2000s; the Alaska Department of Environmental Conservation determined that the cleanup was complete and declared the site closed in December 2010.

According to ARNG policy, property containing or suspected of containing non-CERCLA contamination (asbestos-containing material, lead-based paint (LBP), radon, or munitions of environmental concern) that might limit or preclude the transfer or lease of the Property for unrestricted use are designated as qualified parcels. The old armory building is designated as a qualified parcel for the possible presence of LBP.



Environmental Condition of Property Classifications

ENVIRONMENTAL CONDITION OF PROPERTY

Environmental Condition of Property (ECOP) categories developed under BRAC by the DoD are assigned to FOST Parcels. The classifications are assigned both on the basis of the type of chemical releases (hazardous substances or petroleum) found at the properties and the status of the properties' cleanup activities. These ECOP categories include the following ECP (DoD 1996a):

- ECOP 1 Areas where no release or disposal of hazardous substances or petroleum products has occurred (including migration from adjacent areas).
- ECOP 2 Areas where only the release or disposal of petroleum products has occurred.
- ECOP 3 Areas where release, disposal, or migration of hazardous substances has occurred, but at concentrations that do not require removal or remedial response.
- ECOP 4 Areas where release, disposal, or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.
- ECOP 5 Areas where release, disposal, or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.
- ECOP 6 Areas where release, disposal, or migration of hazardous substances has occurred, but required remedial actions have not yet been implemented.
- ECOP 7 Areas that are not yet evaluated or require additional evaluation.

Individual sites with ECOP Classifications of 1, 2, 3, or 4 are designated as being currently suitable for transfer or lease.

Those with ECOP Classifications of 5, 6, or 7 are not currently suitable for transfer, but may be suitable for lease.

REFERENCES:

Department of Defense (1996). Clarification of "Uncontaminated" Environmental Condition of Property at Base Realignment and Closure Installations.

American Society for Testing and Materials Standard D5746-98 (Revised 2016), Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities.

Attachment 3: Record of Environmental Consideration

Enviro Tracking #:	ARNG ENVIRONMENTAL CHECKLIST		State ARNG
2018DIV007	Enter information in the yellow shaded areas.		AKARNG
PART A - PROJECT INFORMATION			
1. PROJECT NAME: Scammon Bay FSRC Disposal			
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED: 10/31/17	
4. DESCRIPTION AND LOCATION OF THE PROJECT/PROPOSED ACTION:			
a. Location (Include a detailed map, if applicable): The Alaska Army National Guard (AKARNG) Federal Scout Readiness Center (FSRC) is located on 0.34 acres approximately 146 air miles northwest of Bethel and 188 air miles south of Nome.			
b. Description: The AKARNG proposes to dispose of a 0.34-acre parcel on which the Scammon Bay FSRC is located. The parcel consists of one 1,200 square foot (SF) readiness center built in 1959, one 1,500 SF readiness center built in 2002, two 1,500 gallon above ground fuel storage tanks, and a conex box. The disposal action is anticipated to occur in FY 2018.			
c. The proposed action will involve (check all that apply):			
☐ Training activities/areas ☐ Construction ☐ Natural resource management ☐ Maintenance/repair/rehabilitation ☒ Real estate action ☐ Environmental plans/surveys ☐ Innovative readiness training project ☐ Other (Explain):			
d. Project size (acres): (if applicable)		0.34 Acres of new surface disturbance (proposed): (if applicable) NA	
5. START DATE of PROPOSED ACTION (dd-mmm-yy):		Note: This must be a future date.	
6. PROGRAMMED FISCAL YEAR (if applicable):		FY 2018	
7. END DATE (if applicable):			
PART B - DECISION ANALYSIS GUIDE			
To use a categorical exclusion, the project must satisfy the following three screening criteria: no segmentation, no exceptional circumstances and a qualifying categorical exclusion that covers the project. The following decision tree will guide the application and documentation of these three screening criteria. The criteria were extracted from 32 CFR Section 651.29 and represent the most common screening conditions experienced in the ARNG. NOTE: Each question in Part B must have an applicable block checked for concurrence with REC.			
1. Is this action segmented (the scope of the action must include the consideration of connected, cumulative, and similar actions)? ☐ YES (go to #30) ☒ NO (go to #2)			
2. Is there reasonable likelihood of significant environmental effects (direct, indirect, and cumulative)? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. ☐ YES (go to #30) ☒ NO (go to #3)			
3. Is there a reasonable likelihood of significant effects on public health, safety or the environment? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. ☐ YES (go to #30) ☒ NO (go to #4)			
4. Is there an imposition of uncertain or unique environmental risks? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. ☐ YES (go to #30) ☒ NO (go to #5)			
5. Is the project of greater scope or size than is normal for the category of action? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. ☐ YES (go to #30) ☒ NO (go to #6)			
6. Does the project introduce or employ unproven technology? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. ☐ YES (go to #30) ☒ NO (go to #7)			

PART B - DECISION ANALYSIS (continued)

7. Will there be reportable releases of hazardous or toxic substances as specified in 40 CFR Part 302? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☒ NO (go to #8)

8. If proposed action is in a non-attainment or maintenance area, will air emissions exceed de minimus levels or otherwise require a formal Clean Air Act (CAA) conformity determination? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☐ NO (go to #9) ☒ NA (go to #9)

9. Will the project have effects on the quality of the environment that are likely to be highly controversial? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☒ NO (go to #10)

10. Will the project establish a precedent (or make decisions in principle) for future or subsequent actions that are reasonably likely to have future significant effects? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question.

☐ YES (go to #30) ☒ NO (go to #11)

11. Has federal funding been secured for the Innovative Readiness Training (IRT) project?

☒ N/A (go to #13) ☐ YES (go to #13) ☐ NO (go to #12)

12. NOTE: IRT projects not currently funded can secure approved NEPA documentation. However, once funding is secured State ARNG is required to coordinate with ARNG-ILE-T to complete natural and cultural surveys via proponent funding.

☐ CONFIRMED (go to #27)

13. Do you have a species list from the U.S. Fish and Wildlife Service that is less than 90 days old?

☒ YES (go to #14) Date of List: 10/20/17 ☐ NO (update species list return to #13)

14. In reviewing the species list, what determination was made by the State ARNG?

☐ No species present (go to #16)

☒ No affect (go to #16)

☐ May affect but not likely to adversely affect (go to #

Date of USFWS concurrence:

☐ May affect likely to adversely affect (go to #15)

15. Does an existing Biological Opinion cover the action?

☐ YES (go to #16) Date of BO: ☐ NO (go to #30)

16. Have the Endangered Species Act, Section 7 requirements completed?

☒ YES (go to #17) Date of Documentation: 10/20/17 ☐ NO (complete documentation, return to #16)

17. Does the project involve an undertaking to a building or structure that is 50 years of age or older?

☒ YES (go to #18) ☐ NO (go to #20)

18. Has the building or structure been surveyed for the National Register of Historic Places?

☒ YES (go to #19) ☐ NO (complete inventory, return to #18)

19. Is the building or structure eligible for or listed on the National Register of Historic Places?

☒ YES (go to #20) ☐ NO (go to #20)

20. Does the action involve ground disturbing activities?

☒ YES (go to #21) ☐ NO (go to #22)

21. Has an archaeological inventory or research been completed to determine if there are any archeological resources present?

☒ YES (go to #22) ☐ NO (complete inventory or conduct research, return to #21)

22. In reviewing the undertaking, under the National Historic Preservation Act (NHPA) (for both above and below ground resources), what determination was made by the State ARNG?

☐ No 106 undertaking; no additional consultation required under NHPA (go to question #27)

☐ No properties affected (go to #24)

☐ No adverse effect (go to #24)

☒ Adverse effect (go to #23)

Date of SHPO Concurrence:

Date of SHPO Concurrence:

23. Has the State ARNG addressed the adverse effect?

☒ YES (place date of MOA or existing PA and explanation of mitigation in box below, go to #24)

☐ NO (go to #30)

3a. Programmatic Agreement signed 3/15/17. Mitigative measures are in place for the buildings (poster and contextual history book) and land (protocols for eroding cemeteries at remote rural villages like Scammon Bay).

PART B - DECISION ANALYSIS (continued)

24. Per DoDI 4710.02 did the state ARNG determine that tribal consultation was necessary for this project?

☒ YES (go to #25)

☐ NO (Provide reason in this block 24a, go to #27)

24a.

25. Did the Tribes express an interest or respond with concerns about the project?

☐ YES (go to #26)

☒ NO (go to #27)

Date of Documentation: 10/30/17

26. Has the State ARNG addressed the Tribal concerns?

☐ YES (place date of MOU or explanation of how State ARNG addressed tribal concerns in box below, go to #27)

☐ NO (address concerns, return to #26)

Complete only if additional documentation is required in question #26

26a.

27. Does the project involve an unresolved effect on areas having special designation or recognition such as those listed below? For any yes responses go to #30 otherwise go to #28. If any No response is a result of negotiated and/or previously resolved effects please describe resolution in box 27a below.

TYPE	Unresolved Effects?	TYPE	Unresolved Effects?
a. Prime/Unique Farmland	no	e. Wild/Scenic River	no
b. Wilderness Area/National Park	no	f. Coastal Zones	no
c. Sole-Source Aquifer	no	g. 100-year Floodplains	no
d. Wetlands	no	h. National Wildlife Refuges	no

27a. Wetlands areas for this region are not mapped on the USFWS National Wetlands Inventory. According to a draft 2017 Environmental Baseline Survey by the Army Public Health Center (Provisional), the FSRC property is located in an area in which wetlands, including ponds, lakes, and streams, comprise a vast majority of the delta surface (ICRC, 2001). During a site visit in June of 2017, areas of natural vegetation surrounding the Property did not appear to be saturated. Because the Proposed Action is a real estate action, it is not anticipated to have an impact on any wetlands. There is no Federal Emergency Management Agency (FEMA) data available for Scammon Bay. The city of Scammon Bay lies within the Yukon Delta National Wildlife Refuge. The Proposed Action is not anticipated to have an impact on wildlife that may be in the area.

28. Is this project addressed in a separate EA or EIS review?

☐ YES (complete table below; go to Part C, Determination)

☒ NO (go to #29)

Document Title:

Lead Agency:

Date of Decision Document:

29. Does the project meet at least one of the categorical exclusions listed in 32 CFR 651 App B?

☒ YES (complete table below; go to Part C, Determination)

☐ NO (go to #30)

List primary CAT EX code

F-6: Disposal of real property (including facilities) by the Army where...

Describe why CAT EX applies

The Proposed Action is disposal of real property.

30. At this time your project has not met all the qualifications for using a categorical exclusion under 32 CFR 651. Unless the scope of the project is changed, it will require an Environmental Assessment or possibly an Environmental Impact Statement. If you feel this is in error, please call your NEPA Regional Manager to discuss. If needed, go to Part C Determination.

Additional Information (if needed):

According to the USFWS IPaC site, there are no migratory birds of conservation concern expected to occur at this location.

The Alaska Department of Environmental Conservation (ADEC) Air Non-Point Mobile Source website was consulted on 10 October 2017 to determine that the Scammon Bay Armory is not located within a designated nonattainment area or maintenance area. The only nonattainment area in the State of Alaska is the Fairbanks Nonattainment Area for Particulate Matter (PM)2.5. EPA-identified maintenance areas include Anchorage (Carbon Monoxide), Juneau (PM10), Eagle River (PM10), and Butte (PM2.5). Rural Alaska does experience PM10 issues associated with gravel runways and road dust; and PM2.5 issues associated with wood smoke. Scammon Bay was not identified as a community affected with these issues. The Proposed Action is not anticipated to affect PM10 or PM2.5 levels.

During the most recent site visit to the Scammon Bay FSRC property, the building constructed in 1959 was not able to be accessed; however, the Proposed Action is not anticipated to result in reportable releases of hazardous or toxic substances.

The fuel storage tank at the Scammon Bay FSRC was permanently closed on 3/1/17.

Attachments:

1. Location map

2. USFWS Alaska species list

3. ESA Section 7 compliance MFR

4. Tribal consultation documentation

PART C - DETERMINATION

On the basis of this initial evaluation, the following is appropriate:

- ☐ IAW 32 CFR 651 Appendix B, the proposed action qualifies for a Categorical Exclusion (CX) that does not require a Record of Environmental Consideration.
- ☒ A Record of Environmental Consideration (REC).
- ☐ An Environmental Assessment (EA).
- ☐ A Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

Eric Marcell

Signature of Proponent (Requester)

LTC Eric Marcellus, CFMO, AKARNG

Printed Name of Proponent (Requester)

6 Nov 17

Date Signed

Donald B. Flournoy

Environmental Program Manager

Mr. Donald Flournoy, AKDMVA

Printed Name of Env. Program Manager

2 Nov 2017

Date Signed

Other concurrence (as needed):

Kelly Hope

Signature

Ms. Kelly Hope, NEPA Program Manager, AKDMVA

Printed Name

10/31/17

Date Signed

Signature

Printed Name

Date Signed

Signature

Printed Name

Date Signed

Signature

Printed Name

Date Signed

Signature

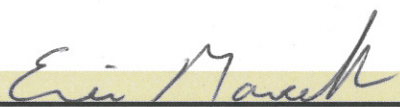
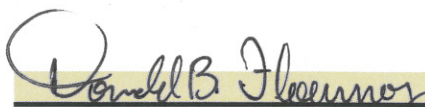
Printed Name

Date Signed

Signature

Printed Name

Date Signed

Enviro Tracking #: 2018DIV007	ARNG Record of Environmental Consideration		State ARNG AKARNG
Enter information in the yellow shaded areas.			
1. PROJECT NAME: Scammon Bay FSRC Disposal			
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED: 10/31/17	
4. START DATE of PROPOSED ACTION (dd-mmm-yy):		Note: This must be a future date	
5. PROGRAMMED FISCAL YEAR:		FY 2018	
6. END DATE (if applicable):			
7. DESCRIPTION AND LOCATION OF THE PROPOSED ACTION:			
a. Location (Include a detailed map, if applicable): The Alaska Army National Guard (AKARNG) Federal Scout Readiness Center (FSRC) is located on 0.34 acres approximately 146 air miles northwest of Bethel and 188 air miles south of Nome.			
b. Description: The AKARNG proposes to dispose of a 0.34-acre parcel on which the Scammon Bay FSRC is located. The parcel consists of one 1,200 square foot (SF) readiness center built in 1959, one 1,500 SF readiness center built in 2002, two 1,500 gallon above ground fuel storage tanks, and a conex box. The disposal action is anticipated to occur in FY 2018.			
8. CHOOSE ONE OF THE FOLLOWING:			
☐ An existing environmental assessment* adequately covers the scope of this project. Attach FNSI if EA was completed by another federal agency (non-ARNG). EA Date (dd-mmm-yy): Lead Agency:			
☐ An existing environmental impact statement* adequately covers the scope of this project. EIS Date (dd-mmm-yy): Lead Agency:			
☒ After reviewing the screening criteria and completing the ARNG environmental checklist, this project qualifies for a Categorical Exclusion Code: F-6: Disposal of real property (including facilities) by the Army where... See 32 CFR 651 App. B Categorical Exclusion Code: See 32 CFR 651 App. B Categorical Exclusion Code: See 32 CFR 651 App. B			
☐ This project is exempt from NEPA requirements under the provisions of: Cite superseding law:			
*Copies of the referenced EA or EIS can be found in the ARNG Environmental Office within each state.			
9. REMARKS:			
 Signature of Proponent (Requester)		 Environmental Program Manager	
LTC Eric Marcellus, CFMO, AKARNG Printed Name of Proponent (Requester)		Mr. Donald Flournoy, AKDMVA Printed Name of Env. Program Manager	
6 NOV 17 Date Signed		02 Nov 2017 Date Signed	
Proponent Information:			
10. Proponent:		Alaska Army National Guard	
11. Address:		PO Box 5800, JBER, AK 99505	
12. POC:		LTC Eric Marcellus	
13. Comm. Voice:			
14. Proponent POC e-mail:		eric.l.marcellus.mil@mail.mil	

Attachment 5: Public Notice of Availability and Regulatory Comments



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

P.O. Box 111800
Juneau, Alaska 99811-1800
Main: 907.465.5250
Fax: 907.465.5245
dec.alaska.gov

File No: 2445.38.001

March 13, 2019

Sent via electronic and regular mail

Patrick Geary, ECOP Program Manager
State of Alaska DMVA
AKARNG Environmental Section
PO Box 5800
JBER, AK 99505

Re: Finding of Suitability to Transfer (FOST) Scammon Bay, Alaska
AKARNG Scammon Bay FSA
Hazard ID 2821

Dear Mr. Geary:

The Alaska Department of Environmental Conservation (ADEC) Juneau Office has reviewed the FOST for Scammon Bay and has no objections. The AKARNG Scammon Bay FSA is an ADEC Contaminated Site and is currently listed as "cleanup complete". A Record of Decision (ROD) signed by both the AKARNG and the ADEC in 2010 documented the cleanup levels for the site. The listed contaminants of concern were gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), benzene, toluene, ethylbenzene, and xylenes. The affected media was soil only; groundwater was not encountered during any of the investigative or cleanup activities. The cleanup levels that applied to soil on site were the 18 AAC 75.341 Tables B1 and B2 for the under-40 inch precipitation zone. Although groundwater was not encountered, the 18 AAC 75.345 Table C cleanup levels applied to groundwater. During the last cleanup action, approximately 410 tons of petroleum contaminated soil was excavated and disposed of at an Oregon landfill. An ADEC Determination of Cleanup Complete was made on December 3, 2010 and the site was subsequently closed on the ADEC Contaminated Sites database without institutional controls.

If you have any questions regarding this letter or concerns please feel free to contact me by telephone at 907-465-5207 or email at Danielle.Duncan@alaska.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'DDuncan', with a long horizontal stroke extending to the right.

Danielle Duncan
Project Manager