

Environmental Baseline Surveys

Negotiating the EBS Process



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WHY AN EBS ?

What regulations mandate an EBS ?

- Comprehensive Environmental Response, Compensation, and Liability Act (1980)
- 40 CFR Part 373 requires a notice to accompany contracts for the sale of, and deeds entered into for the transfer of, Federal property on which hazardous substances may have been stored, released or disposed.
- Army Regulation 200-1, Section 15-6 (Real Property Acquisition, Outgrant, and Disposal Transactions)



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APPLICABLE GUIDANCE

- ASTM D6008-96 (2005) - Standard Practice for Conducting Environmental Baseline Surveys
- ASTM D5746-98 (2002) - Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities
- DOD and Army Policies
- DA PAM 200-1 - Environmental Protection and Enhancement



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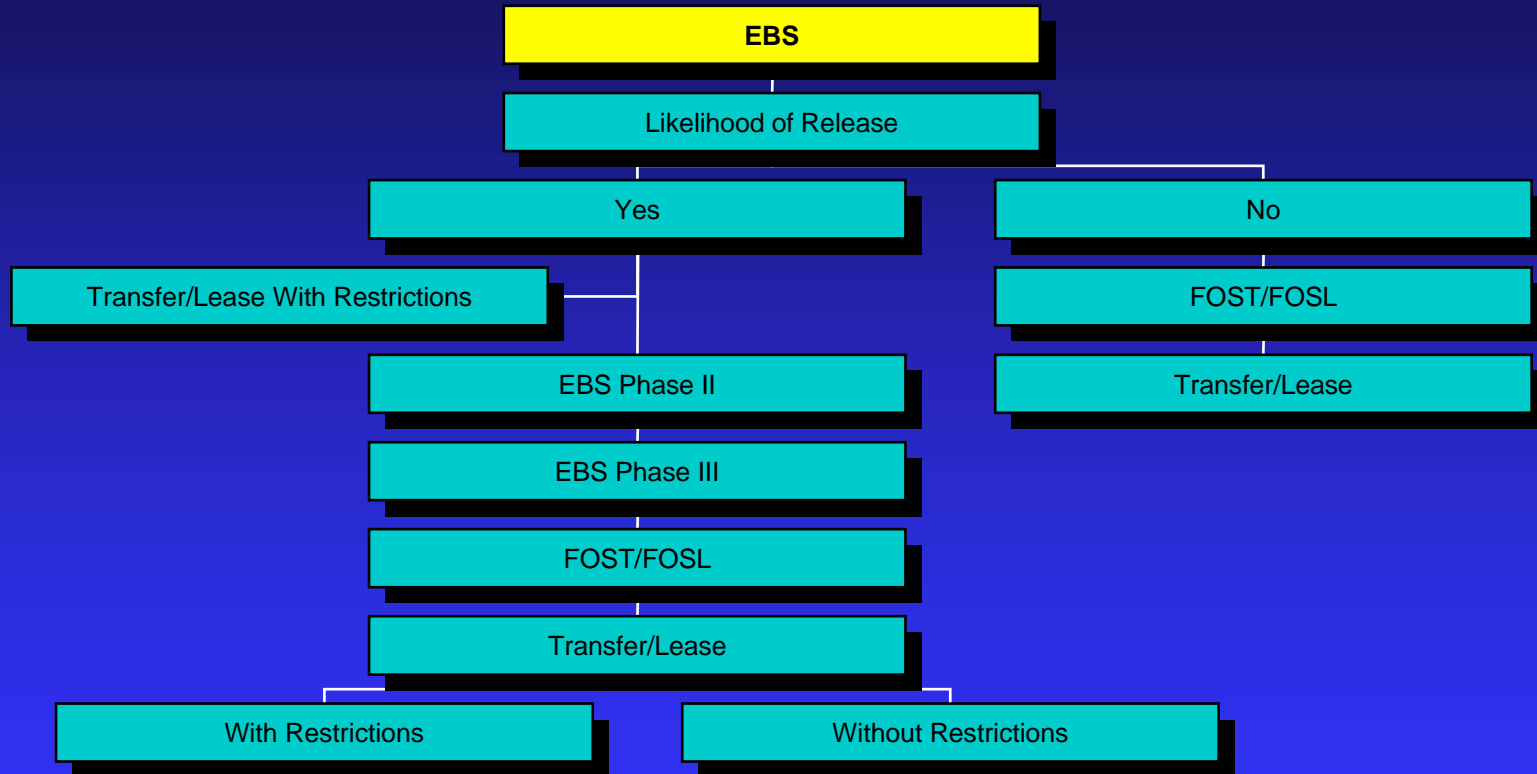
PURPOSE

- Identify, characterize, and document the presence or likely presence of a release or a material threat of a release of any hazardous substances or petroleum products into the environment associated with the historical and recent use of the Property.
- Identify, characterize, and document the release or possible release of any hazardous substances or petroleum products from an adjacent property that would likely cause or contribute to contamination on the Property.
- Provide a basis for determining if the Property is suitable for transfer, lease, or assignment.
- Provide a commercially acceptable level of environmental information necessary to facilitate the divestiture of the Property.



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EBS PROCESS



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WHAT ARE FOST/FOSL ?

FOST = Finding of Suitability to Transfer

FOSL = Finding of Suitability to Lease

The FOST and FOSL document that a property is environmentally suitable for transfer or lease, with or without deed restrictions, in accordance with applicable guidance.



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FORMAT

- ❑ The EBS is designed to assign each building or area of concern to an Environmental Classification of Property (ECP) category
- ❑ There are 7 ECP categories



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ECP CATEGORIES

- I. Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
- II. Areas where only release or disposal of petroleum products has occurred.
- III. Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- IV. Areas where release, disposal, and/or migration of hazardous substances has occurred, and where all remedial actions necessary to protect human health and the environment have been taken.
- V. Areas where release, disposal, and/or migration of hazardous substances has occurred, and where removal actions are underway, but where all required remedial actions have not yet been taken.
- VI. Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- VII. Areas that have not yet been evaluated or require additional evaluation.



THE TASKS

- Installation Visit
- Records Search
- Gather Environmental Data
- Follow Up Visit/Verify Data
- Report
- Phase II/Phase III



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THE TASKS

□ Installation Visit



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INSTALLATION VISIT

- Document Existing Condition and Use History of Each Building
- Document Existing Condition and Use History of Each Area of Concern
- Interview Persons Familiar with Past and Present Practices
- Evaluate Regulatory Status
- Evaluate Adjacent Properties



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THE TASKS

- Installation Visit
- Records Search



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RECORDS SEARCH

- Previous Studies
- Aerial Photographs
- Real Property Records
- Engineering Drawings
- Maps (Floodplain, Topography, Wetlands, Geology)
- Utility Company Records and Drawings
- Deeds
- National and State Environmental Databases (UST, LUST, NPL, CERCLIS, RCRIS, PADS, RAATS, TRIS, TSCA, HMIRS)



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THE TASKS

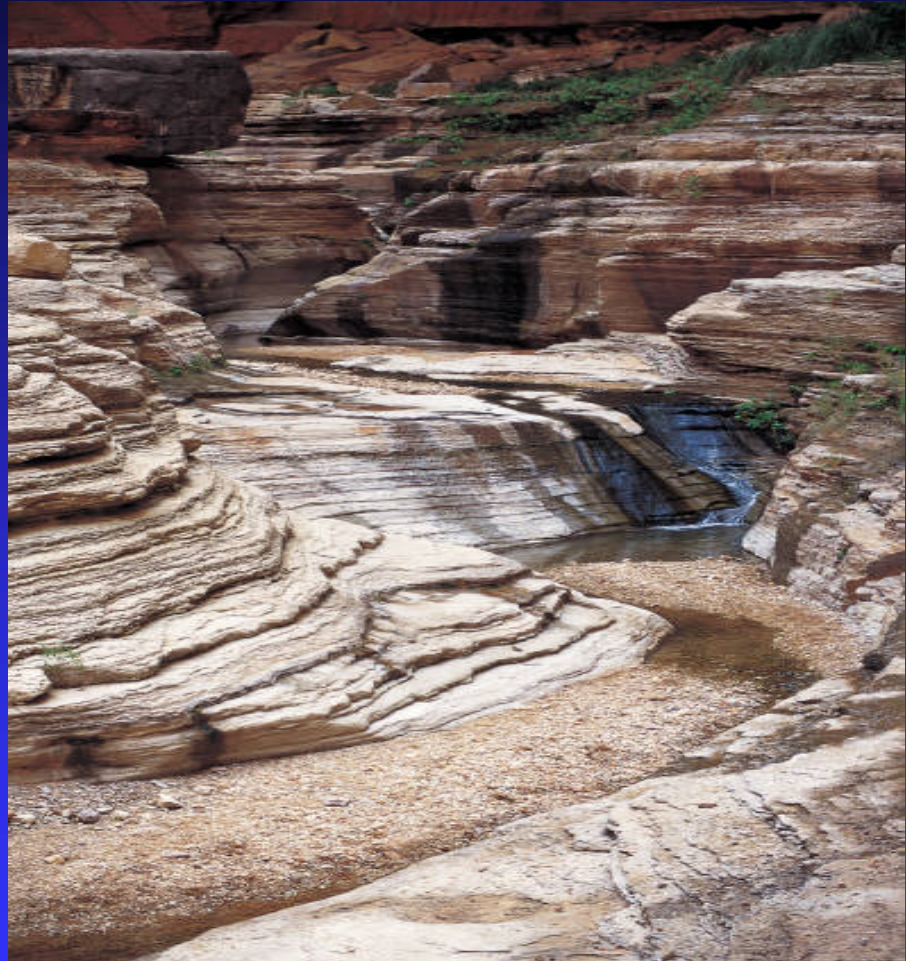
- Site Visit
- Records Search
- Gather Environmental Data



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ENVIRONMENTAL DATA

- Climate
- Geology
- Hydrology
- Endangered Species
- Cultural Resources



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POTENTIAL CONTAMINANTS

- Petroleum Hydrocarbons
- Polychlorinated Biphenyls (PCBs)
- Pesticides/Herbicides
- Solvents
- Asbestos
- Lead
- Radon
- UXO
- Radionuclides



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COMMON AREAS OF CONCERN

- Underground Storage Tanks
- Wash Racks
- Treatment, Storage, and Disposal Facilities
- Rail Yards and Sidings
- Landfills
- Lumber Yards
- Electric Substations
- Sewer Lines/Treatment Facilities
- Burn Pits



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USTs



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WASH RACKS



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RAIL YARDS



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TSD FACILITIES



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LANDFILLS



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ELECTRIC SUBSTATIONS



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BURN PITS



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FINAL AND FOLLOW UP TASKS

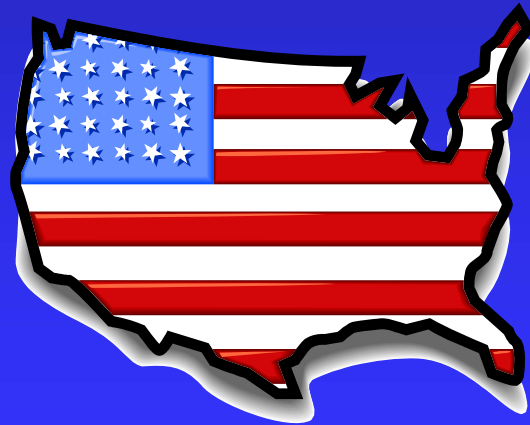
- Installation Visit
- Records Search
- Gather Environmental Data
- Follow Up Visit/Verify Data
- Report
- Phase II/Phase III



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CHPPM

- Experienced Project Managers
- Consistent, High Quality Reports
- Quick Response
- Low Paperwork Burden
- Can Perform an EBS at any DOD Facility
- Past Surveys in MD, KY, CA, GA, WV, NJ, PA, VA, TX, AR, AK



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ENVIRONMENTAL BASELINE STUDIES

For assistance

U.S. Army Center for Health Promotion and Preventive
Medicine (USACHPPM)

Mr. Wayne Fox – (410) 436-5238

Wayne.Fox@apg.amedd.army.mil

<http://chppm-www.apgea.army.mil/gwswp>

Other soil and ground-water services are available.



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