

MEMORANDUM FOR RECORD

SUBJECT: Notification and Recommendation Pursuant to Releases of Per- and Polyfluoroalkyl Substances on Base Realignment and Closure (BRAC) Property at Former Fort McPherson

1. Purpose:

a. Document the Army's review of existing information pertaining to the former Fort McPherson to determine whether historical use, storage, or release of PFAS containing materials may have resulted in a release of PFAS compounds into the environment. Document and receive approval for the decision to not further investigate the use, storage, or release of PFAS compounds. The term PFAS includes but is not limited to, perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA), and perfluorobutanesulfonic acid (PFBS).

b. This Memorandum for Record provides background information and justification to recommend No Further Action related to PFAS.

2. Background:

a. The Former Fort McPherson was closed under the 2005 Base Realignment and Closure Act, and the majority of the property, 475 acres has been transferred to the Fort McPherson Implementation Local Redevelopment Authority ("MILRA"). The Army currently retains 14 acres of land at the Former Fort McPherson which is the FTMP-13 Dry Cleaner Site.

b. In May 2016, the U.S. Environmental Protection Agency (EPA) declared a Life Time Health Advisory (LHA) for PFOS and PFOA, singly or combined, of 0.07 micrograms per liter ($\mu\text{g/L}$) or 70 parts per trillion (ppt) in drinking water. In September 2018, the Army issued guidance and instructions to complete historical research to find potential PFAS source areas. This resulted in a "Key Word" Search effort within the environmental site inventory. Words such as crash, burn, fire, training and pit were searched for within the inventory. This resulted in a list of installations that may have potentially used or stored PFAS compounds. This list includes Fort McPherson.

3. Recommendation: Request an expeditions response and concurrence for the decision that No Further Action is required at Fort McPherson with regards to PFAS, as described in further detail in Attachment A.

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4. The point of contact for this memorandum is Joan Hutton, BRAC Environmental Coordinator, Joan.Hutton@calibresys.com.

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ATTACHMENT A

BLUF: Two sites were identified as potentially having a PFAS-containing material use, storage, or release but further research into these sites does not support conducting a Preliminary Assessment or Site Investigation under CERCLA. The Army should focus on transferring the remaining 14 acres.

1. Name of Installation: Fort McPherson

2. Installation Summary: Fort McPherson was closed under the Base Realignment and Closure (BRAC) program of 2005. The BRAC Commission voted to close Fort McPherson on 9 November 2005. The Army standing down process began in 2007, and all operations on the Property were terminated and the Property placed in caretaker status on 15 September 2011. Below is a summary of parcel transfers that have occurred since September 2011:

- The U.S. Department of Veterans Affairs (VA), through a Fed-to-Fed conveyance, received six buildings and 10.106 acres of associated land. The letter of transfer was signed by the Army on 4 November 2011. The transfer included Buildings 125, 128, 129, 130, 131, and 132 and non-exclusive easements for ingress/egress on Hardee Avenue, Thorne Avenue, Anderson Way, Cumming Drive, Dietz Avenue, and Walker Drive. The VA has since demolished Building 132.
- The McPherson Credit Union (Building 248) purchased 0.484 acre of land with perpetual easements for ingress/egress on Hardee Avenue and Thorne Avenue. The quit-claim deed granting the property was signed on 12 June 2011.
- The Associated Credit Union (Building 123) purchased 0.786 acre of land with perpetual easements for ingress/egress on Hardy [sic] Avenue, Thorne Avenue, Anderson Way, and Wofford Circle. The quit-claim deed granting the property was signed on 26 April 2012.
- The Economic Development parcel totaling 434 acres and 248 buildings and structures was transferred to the McPherson Implementation Local Redevelopment Authority (MILRA) on 26 June 2015.
- The FTMP-06 Incinerator Ash Disposal Site totaling four acres was transferred to the McPherson Implementation Redevelopment Authority (MILRA) on 6 October 2016.
- The FTMP-11 Army Parking Lot consisting of 1.1 acres was transferred to the MILRA on 25 May 2017.
- The FTMP-14 Crematory Site totaling 4 acres was transferred to the MILRA on 25 May 2017.
- FTMP-004-R-01 Trap and Skeet Range totaling 17.4684 acres was transferred to the MILRA on 25 May 2017.

3. Date Transferred, Authority Used: The authority used to transfer Fort McPherson was under Defense Base Realignment and Closure (BRAC) Act of 1990 (part A of the title xxix of Public Law No.101-510; U.S.C § 2687 note). Land Use Restrictions are in

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the deed for Groundwater: The Grantee, for itself, its successors and assigns, hereby covenants and agrees not to access or use, or allow access to or use of, the ground water underlying the Property for any purpose without written approval of the United States Department of the Army and Georgia Environmental Protection Division.

4. **Anticipated Transfer of Army-owned Property:** The Army owned property to be transfer was the site of the post dry cleaners, the water tower and the 3rd Army Headquarters building. The anticipated reuse will be industrial use only. There will be groundwater use restrictions in the future deed for this parcel.
5. **Groundwater Remedy/Use:** Groundwater is not used for potable purposes at the Former Fort McPherson. The Potable water supply is provided by municipal water systems. The current remedy in place includes a groundwater restriction.
6. **State status.** The state of Georgia has not established a standard as a result of the LHA.
7. **Potential for PFC contamination? Yes or No or likely:** No.
8. **Recommendation (Procedures contemplated, Right of Entry, sampling, etc):** A key word search with the DERP Environmental Site Inventory was completed to develop a list of installations that may have had a release related to the use or storage of PFAS on BRAC Installations. The key word search for Former Fort McPherson found two site key words: Burn Area (FTMP-14 Crematory Site) and Installation Fire House (Building 106).

FTMP-14, Crematory Site: This site was located at the end of Murphy Circle situated between the 15th and 16th holes on the Installation golf course. The crematory was built in the late 1880s to support the hospital and burn medical waste. It operated until it burned to the ground in the 1920s. Ash and debris from the operation of the crematory was dumped in the area and, following destruction of the building, was covered over. The buried material extended from the cleared area to a surface creek on the northwest corner of the Installation, approximately three acres. A removal action was completed at FTMP-14 in 2016 which removed the three acres of buried waste. A No Further Action ROD was signed 13 Jan 2017. This site is located on property that is no longer owned by the Army. The site is Disposal Tract A-5 on Quitclaim Deed Former Fort McPherson Phase II Parcels and was transferred to MILRA in May 2017, PFAS were not used during cremation activities and was not invented until the late 1960s. Therefore, the Army has no reason to believe PFAS were used, stored, or released at the FTMP-14 Crematory Site.

Installation Fire House, Building 106: The Former Fort McPherson had a fire station present on the installation, however, there was no fire training area present on the installation and fire training exercises were not conducted. There were no fire incidents leading to the use of fire-fighting foam at the installation (O. Nuttall, personal communication, 12 January 2020). Record search indicates that AFFF was never used

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or stored on the installation. In fact, a *Hazardous Chemical Inventory for Fort McPherson and Fort Gillem* (dated Aug 2000) states that Fort McPherson storage facilities were moved to Fort Gillem and reports Fort Gillem stored "Fire Fighting Foam" at Fire Department Building 103. This site is located on property that is no longer owned by the Army. The site is Disposal Tract A-3 on Quitclaim Deed Fort McPherson Phase I Parcel and was transferred to the MLRA in June 2015. Therefore, the Army has no reason to believe PFAS were used, stored, or released on Fort McPherson or near the Installation Fire House.

Therefore, No Further Action is recommended for Fort McPherson because PFAS-containing materials were not used, stored, or released at Fort McPherson, there are no drinking water receptors, and there are no groundwater receptors and the BRAC Office should continue to support the transfer of the remaining 14 acres.

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ATTACHMENT B

1. 10 U.S.C. 2701 et. seq.
2. DoDM 4715.20 Defense Environmental Restoration Program Manual (9 March 2012)
3. DoDI 4715.18 Emerging Contaminants (13 December 2017)
4. AR 200-1 (13 December 2007)
5. Base Redevelopment and Realignment Manual (1 March 2006)
6. Department of Army Guidance to Address Perfluoro-octane Sulfonate and Perfluoro-octanoic Acid Contamination (29 August 2016)
7. Quitclaim Deed Fort McPherson, Georgia, Disposal Tract A-3, Phase I Parcel (26 June 2015)
8. Quitclaim Deed Form Fort McPherson, Fulton County, Georgia, Disposal Tract A-5, the FTMP-11, Army Parking Lot; the FTMP-14, Crematory Site; the FTMP-004-R-01, Trap and Skeet Range; Phase II Parcels (25 May 2017)