



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

ARNG-IES-D

28 December 2021

MEMORANDUM FOR RECORD

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Topeka Army Aviation Support Facility (AASF) #1, Topeka, Kansas

1. References:

- a. HQDA, ASA-IE&E, SAIE-ZA, memorandum (Army Environmental Per- and Polyfluoroalkyl Substances (PFAS) Policy), 8 January 2021
- b. DoDM 4715.20 (Defense Environmental Restoration Program (DERP) Management), 9 March 2012, incorporating Change 1, 31 August 2018
- c. OSD, memorandum (Investigating Per- and Polyfluoroalkyl Substances within the Department of Defense Cleanup Program), 15 September 2021
- d. AR 200-1 (Environmental Protection and Enhancement)
- e. Final Preliminary Assessment Report, Topeka Army Aviation Support Facility #1, Topeka, Kansas, Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, January 2020
- f. Final Site Inspection Report Topeka Army Aviation Support Facility #1, Topeka, Kansas, Perfluorooctane Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, December 2021

2. The requirement for an environmental response to potential and/or known releases of PFAS under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Department of Defense Manual (DoDM) for the DERP is established in References 1.a through 1.d.

3. This memorandum documents the determinations reached at the conclusion of the Preliminary Assessment (PA)/Site Inspection (SI) phase in accordance with the Department of Defense (DoD) DERP Management manual (DERP Management; Reference 1.b). When concluding the PA/SI phase of the CERCLA process, the Army National Guard (ARNG) must formally document a determination for each site in

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accordance with paragraph 4.b.(2)(b) of Enclosure 3 of DoDM 4715.20. The potential options are as follows: 1) No need for action; 2) Need for a removal action, but not a remedial action; or, 3) Need for Remedial Investigation (RI)/Feasibility Study (FS). This Technical Memorandum documents the ARNG's determination related to the PFAS PA/SI at Topeka AASF #1, Kansas. The need for a RI is based upon the following media-specific risk screening levels, as directed by the Assistant Secretary of Defense for Sustainment (Reference 1.c): Groundwater: PFOS: 40 nanograms per liter (ng/L) (40 parts per trillion (ppt)), PFOA: 40 ng/L (40 ppt), PFBS: 600 ng/L (600 ppt); Soil: PFOS: 130 micrograms per kilogram ($\mu\text{g}/\text{kg}$), PFOA: 130 $\mu\text{g}/\text{kg}$, PFBS: 1,900 $\mu\text{g}/\text{kg}$.

4. The PFAS PA at Topeka AASF #1, finalized on 7 January 2020, Reference 1.e, concluded an SI is warranted at one Area of Interest (AOI) due to potential release(s) of PFAS to the environment from the use or storage of PFAS-containing materials, such as Aqueous Film Forming Foam (AFFF).

5. The PFAS SI at Topeka AASF #1, finalized on 3 December 2021, Reference 1.f, sampled one AOI, and confirmed the presence of PFAS in the environment. Concentrations of PFAS equal to or exceeding the screening levels established by the Office of the Secretary of Defense (OSD) in Reference 1.c were found at the AOI. The SI concluded further investigation is warranted via RI at the one AOI where exceedances were found.

6. The determination for NFA, progressing to RI, or implementing a Time-Critical Removal Action (TCRA) is made independently for each of the AOIs at the subject facility based on the data collected during the SI.

7. Army National Guard Installations and Environment Division, Environmental Cleanup and Restoration Branch (ARNG G-9) hereby confirms the recommendations from the SI by formalizing the following decision for the AOI at Topeka AASF #1:

a. AOI 1, AFFF Fire Extinguisher Release: RI is required.

8. Appropriate coordination regarding this determination has occurred between ARNG-Office of General Counsel (OGC) and ARNG G-9.

9. The point of contact for this action is Mr. David Connolly, PFAS Program Manager, david.m.connolly8.civ@army.mil, or 703-607-7589.

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Encl

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Per- And Polyfluoroalkyl Substances (PFAS) PA/SI Determination Summary

Topeka Army Aviation Support Facility #1, Kansas

Location		Preliminary Assessment (PA)		Site Inspection (SI)	
AOI #	Area Description	Conclusion	Determination	Conclusion	Determination
1	AFFF Fire Extinguisher Release	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media confirmed above screening levels	Proceed with RI