



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

ARNG-IES-D

6 December 2021

MEMORANDUM FOR RECORD

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Camp Minden, Louisiana

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 Camp Minden, Louisiana Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, February 2019
- f. Final Site Inspection Report Camp Minden, LA Perfluorooctane Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, September 2020

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 PA/SI phases 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 accordance with paragraph 4.b.(2)(b) of Enclosure 3 of DoDM 4715.20. The potential options are as follows: 1) No need for

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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 Camp Minden, Louisiana. 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 (µg/kg), PFOA: 130 µg/kg, PFBS: 1,900 µg/kg.

4. The PFAS Preliminary Assessment at Camp Minden, LA, finalized in February 2019, Reference 1.e, concluded further inspection 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 Site Inspection at Camp Minden, LA, finalized on 30 September 2020, Reference 1.f, concluded that further inspection under CERCLA is not warranted at the one area of interest (AOI) due to no detections of PFOA, PFOS or PFBS in groundwater; PFOA detected in soil at concentrations several orders of magnitude below the screening level. 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 not found at the one AOI. Additionally, the one area of interest, the Louisiana State University Fire and Emergency Training Institute, is not under the control of the ARNG. Based on the state of Louisiana owner/operator status, the state may consider any future follow-up actions.

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(s) for each AOI at Camp Minden, LA:

a. AOI 1, Fire and Emergency Training Area: No further action.

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

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

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

Camp Minden, LA

| Location | | Preliminary Assessment (PA) | | Site Inspection (SI) | |
|----------|--|--|-----------------|--|-------------------|
| AOI # | Area Description | Conclusion | Determination | Conclusion | Determination |
| 1 | Louisiana State University Fire and Emergency Training Institute | Sufficient evidence of a potential PFAS release warranting further investigation | Proceed with SI | Release of PFAS into environmental media not confirmed above screening levels; area is not under the control of the ARNG | No further action |

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