



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

ARNG-IES-D

16 November 2021

MEMORANDUM FOR RECORD

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Fort Indiantown Gap, Pennsylvania

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 Fort Indiantown Gap, Pennsylvania Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, September 2018
- f. Final Site Inspection Report Fort Indiantown Gap, PA Perfluorooctane Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites ARNG Installations, Nationwide, April 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 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

ARNG-IES-D

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Fort Indiantown Gap, Pennsylvania

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 Fort Indiantown Gap, Pennsylvania. 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 Fort Indiantown Gap, finalized on 27 September 2018, Reference 1.e, concluded further inspection is warranted at six Areas 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 Fort Indiantown Gap, finalized on 27 April 2021, Reference 1.f, sampled six AOIs, 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 one of the six AOIs. The SI concluded further investigation is warranted via Remedial Investigation (RI) at the one AOI where exceedances were found. No Further Action (NFA) was determined for the remaining five AOIs.

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 Fort Indiantown Gap:

- a. AOI 1, Combined Arms Collective Training Facility: No further action.
- b. AOI 2, West Ramp Fire Pit Training Areas: RI is required.
- c. AOI 2, East Ramp Fire Pit Training Area: RI is required.
- d. AOI 2, Building 019-101 Ramp (Building 019-101): RI is required.
- e. AOI 2, Current Fire Station (Building 5-117): RI is required.

ARNG-IES-D

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Fort Indiantown Gap, Pennsylvania

- f. AOI 2, Crash Site: No further action.
 - g. AOI 2, Simulated Emergency Event: No further action.
 - h. AOI 2, Accidental Tank Spill: No further action.
 - i. AOI 3, Johnson Trail: No further action.
 - j. AOI 4, Fire Pit Area #19: No further action.
 - k. AOI 5, First Street: No further action.
 - l. AOI 6, Biosolid Area: No further action.
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@mail.mil, or 703-607-7589.

Encl

THOMAS K. LAFAVE
Lieutenant Colonel, U.S Army
Chief, Cleanup and Restoration
G-9, Army National Guard

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

Fort Indiantown Gap, Pennsylvania

Location		Preliminary Assessment (PA)		Site Inspection (SI)	
AOI #	Area Description	Conclusion	Determination	Conclusion	Determination
1	Combined Arms Collective Training Facility	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
2	West Ramp Fire Pit Training Areas	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
	East Ramp Fire Pit Training Area	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
	Building 019-101 Ramp (Building 019-101)	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
	Current Fire Station (Building 5-117)	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

ARNG-IES-D

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Fort Indiantown Gap, Pennsylvania

2 (cont.)	Crash Site	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
	Simulated Emergency Event	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
	Accidental Tank Spill	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
3	Johnson Trail	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
4	Fire Pit Area #19	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
5	First Street	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action

ARNG-IES-D

SUBJECT: Determination Documentation of the Preliminary Assessment (PA) / Site Inspection (SI) for Fort Indiantown Gap, Pennsylvania

6	Biosolid Area	Sufficient evidence of a potential PFAS release warranting further investigation	Proceed with SI	Release of PFAS into environmental media not confirmed above screening levels	No further action
N/A	Prescribed Burns	Insufficient evidence of a potential PFAS release warranting further investigation	No further action	Not evaluated during SI	No further action
	Former Crash Rescue Fire Station	Insufficient evidence of a potential PFAS release warranting further investigation	No further action	Not evaluated during SI	No further action
	Waste Water Treatment Plant	Insufficient evidence of a potential PFAS release warranting further investigation	No further action	Not evaluated during SI	No further action
	Building 019-177	Insufficient evidence of a potential PFAS release warranting further investigation	No further action	Not evaluated during SI	No further action
	Landfills	Insufficient evidence of a potential PFAS release warranting further investigation	No further action	Not evaluated during SI	No further action