



NATIONAL GUARD BUREAU

111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1373

ARNG-ILE-AE

12 September 2014

MEMORANDUM FOR ARNG-ILI-E (LTC Hassler), 111 S. George Mason Drive,
Arlington, VA 22204

SUBJECT: Review of National Environmental Policy Act (NEPA) and Environmental Condition of Property (ECOP) Requirements for a Proposed Lease for the Construction of a Solar Photo-Voltaic (PV) Electricity Generation System at Fort Indiantown Gap (FTIG), Annville, PA

1. References:

a. Environmental Baseline Survey (EBS), EBS for Cantonment Area 4 Proposed Solar PV Power Purchase Agreement Project at National Guard Training Center- Fort Indiantown Gap, Union Township, Lebanon County, Pennsylvania, July 2014.

b. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, Section 15-5, Real Property acquisition, leases, outgrants, and disposal transactions, 3 December 2007.

c. The Army National Guard ECOP Handbook, 1 June 2011.

d. ARNG Record of Environmental Consideration (REC), Pennsylvania Army National Guard, Construction and Facilities Management Office, 27 May 2014, Subject: Solar Farm Lease/Purchase Power Agreement.

e. 32 CFR Part 651, Environmental Analysis of Army Actions, 29 March 2002.

f. The Army National Guard NEPA Handbook, 1 October 2011.

2. The PAARNG seeks to grant a long term permit (less than 20 years) for the construction of a 3 megawatt solar PV electricity generation system at FTIG via a purchase power agreement (PPA). The PPA will include a lease of an approximately 18 acre site on FTIG.

3. ARNG-ILE-AE completed a review of the ECOP documentation in reference 1a and found the existing condition of property is sufficiently documented per the requirements in references 1b and 1c.

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a. The subject property is classified as an ECOP Area Type 1, Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).

b. A June 2000 Final Preliminary Assessment was conducted at FTIG and identified an area on the subject property which required additional assessment due to a suspected “former tear gas chamber building” observed on the southwestern portion of the subject property. This feature was observed from a March 1978 “General Road and Railroad Map” produced by the Baltimore District of the US Army Corps of Engineers (ACOE). A July 2001 Draft Final Site Inspection details the soil sampling investigation of the suspected “former tear gas chamber building”. Soils sampled from this area of the subject property did not detect concentrations exceeding laboratory detection limits, Pennsylvania statewide health standards, or background concentrations at FTIG.

c. Additionally, a former field latrine (Building 04-165) was located in the southwestern area of the subject property in the same vicinity of the suspected “former tear gas chamber building”. The field latrine was demolished in 1998 and it is likely that the March 1978 ACOE Map misidentified the structure as a “former tear gas chamber building”.

d. On-site observations from the 2014 EBS identified a large “debris pile” on the northern portion of the subject property. This “debris pile” is described as overgrown with vegetation and small trees consisting mostly of rock, soil, and concrete with miscellaneous pieces of plastic and metal intermixed. No signs of chemical containers, staining, or dumping of hazardous materials was observed during the on-site inspection of this area. The debris pile was addressed in interviews with PADMVA’s Bureau of Reservation Maintenance personnel; and it was stated that the pile has been present on the subject property since management of FTIG was transferred over to the PAARNG from the federal government in October 1998. Additionally, analysis of aerial photographs is inconclusive in revealing the origin and timeframe of the debris pile.

e. It is recommended that preliminary test pits be performed prior to any earth disturbing/grading activities involving the debris pile due to the uncertainty of this feature’s origin and overall contents. There is a low risk of encountering potential hazardous substances and/or Munitions & Explosives of Concerns (MEC) associated with the debris pile; however personnel on-site conducting the test pits should receive site-specific 3Rs training to recognize any potential explosive hazards that may be encountered, as well as 40-hour HAZWOPER training.

4. None of the items listed above preclude the proposed real estate action.

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5. The REC prepared for the action (reference 1d) documents NEPA compliance by the PAARNG and was prepared in accordance with references 1e and 1f.
6. The point of contact is Mr. Brian Parrish, ECOP Program Manager, 703-607-9952, or brian.k.parrish13.ctr@mail.mil.



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