



FINAL

**FINDING OF SUITABILITY TO TRANSFER
(FOST)**

**Umatilla Chemical Depot, Oregon
Columbia Development Authority**

Parcel 1

March 2022

**FINDING OF SUITABILITY TO TRANSFER (FOST)
UMATILLA CHEMICAL DEPOT**

TABLE OF CONTENTS

ACRONYMS AND ABBREVIATIONS	iii
1 PURPOSE	1
2 PROPERTY DESCRIPTION	1
3 ENVIRONMENTAL DOCUMENTATION	3
4 ENVIRONMENTAL CONDITION OF PROPERTY	3
4.1 ENVIRONMENTAL REMEDIATION SITES	5
4.2 STORAGE, RELEASE, OR DISPOSAL OF HAZARDOUS SUBSTANCES	10
4.3 PETROLEUM AND PETROLEUM PRODUCTS	10
4.4 POLYCHLORINATED BIPHENYLS (PCB)	11
4.5 ASBESTOS	11
4.6 LEAD-BASED PAINT (LBP)	12
4.7 RADIOLOGICAL MATERIALS	12
4.8 RADON	12
4.9 OTHER PROPERTY CONDITIONS	12
4.10 MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)	12
5 ADJACENT PROPERTY CONDITIONS	13
6 ENVIRONMENTAL REMEDIATION AGREEMENTS	14
7 REGULATORY/PUBLIC COORDINATION	14
8 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE	14
9 FINDING OF SUITABILITY TO TRANSFER	15

ACRONYMS AND ABBREVIATIONS

ACM	Asbestos Containing Material
AST	Above Ground Storage Tank
ASTM	American Society for Testing Materials
BNA	Base-neutral and Acid Extractable Organics
BRAC	Base Realignment and Closure
BTEX	Benzene, Toluene, Ethyl-benzene, Xylenes
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CWM	Chemical Warfare Material
DDESB	Department of Defense Explosives Safety Board
DMM	Discarded Military Munitions
DOD	U.S. Department of Defense
ECP	Environmental Condition of Property
EES	Easement and Equitable Servitude
EMPA	Ethyl Methylphosphonic Acid
EPA	U.S. Environmental Protection Agency
EPPs	Environmental Protection Provisions
ESS	Explosives Safety Submission
EWL	Explosives Washout Lagoons
FFA	Federal Facility Agreement
FOST	Finding of Suitability to Transfer
FS	Feasibility Study
Ft	feet or foot
GB	Nerve Agent (Sarin)
HD	Blister Agent (Mustard Agent)
HTH	Calcium Hypochlorite
IMPA	Isopropyl Methyl Phosphonic Acid
Inc.	Incorporated
LBP	Lead Based Paint
LUC	Land Use Control
MEC	Munitions and Explosives of Concern
NDAI	No DOD Action Indicated
NEPA	National Environmental Policy Act
NFA	No Further Action
NORM	Naturally Occurring Radioactive Material
NPL	National Priorities List
NRC	Nuclear Regulatory Commission
ODEQ	Oregon Department of Environmental Quality
OSHA	Occupational Safety and Health Administration
OU	Operable Unit

PCB	Polychlorinated Biphenyls
pCi/L	picocuries per liter
ppm	Parts per million
QA	Quality Assurance
RCRA	Resource Conservation and Recovery Act
RDX	Hexahydro-1,3,5-trinitro-1,3,5-triazine
REC	Record of Environmental Consideration
RI	Remedial Investigation
ROD	Record of Decision
sq	Square foot (feet)
SRI	Supplemental Remedial Investigation
SVOC	Semi-Volatile Organic Compounds
TAL	Target Analyte List
TCL	Target Compound List
TNT	2,4,6-Trinitrotoluene
TPH	Total Petroleum Hydrocarbons
UDMH	unsymmetrical dimethyl hydrazine
UMCD	Umatilla Chemical Depot
USACE	U.S. Army Corps of Engineers
UST	Underground Storage Tank
UXO	Unexploded Ordnance
VOA	Volatile Organic Analytes
VOC	Volatile Organic Compound
VX	Nerve Agent S-2-(diisopropylamino)ethyl-O-ethyl-methylphosphonothioate

**FINDING OF SUITABILITY TO TRANSFER
(FOST)
Umatilla Chemical Depot**

March 2022

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of Parcel 1 (9,511.46 acres) at the Umatilla Chemical Depot, Hermiston, Oregon for transfer to the Columbia Development Authority (CDA) consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy. In addition, this FOST includes the CERCLA Notice, Covenant, and Access Provisions and other Deed Provisions and the Environmental Protection Provisions (EPPs) necessary to protect human health or the environment after such transfer.

2. PROPERTY DESCRIPTION

The Umatilla Chemical Depot (UMCD) is located in northeastern Oregon approximately 180 miles east of Portland, OR, 8 miles west of Hermiston, OR, and 3 miles south of the Columbia River. UMCD is bisected by the Umatilla County and Morrow County boundary line. UMCD is located in rural Eastern Oregon and surrounded by property used for agricultural purposes. There are no agricultural or grazing leases on UMCD.

The depot property originally encompassed 17,148.80 acres. The historical mission of UMCD was the storage, maintenance, and disposal of conventional and chemical munitions. No weapons manufacturing ever occurred on the site, but storage, maintenance, and destruction of both conventional munitions and chemical warfare material (CWM) did occur. Under the authority of the 1988 Base Closure and Realignment Act (BRAC), the installation was realigned and lost its conventional munitions storage mission. In the years following the BRAC 1988 realignment, the installation remained active with just the storage, maintenance, and destruction of its chemical munitions stockpile. Under the authority of the Defense Base Closure and Realignment (BRAC) Act of 1990 as amended in 2005, the installation was approved for closure conditioned upon a provision in the National Defense Authorization Act of 2012 that the installation would close not later than one year after the completion of the chemical demilitarization mission.

In 2017, the Army assigned 7,500 acres to the National Guard Bureau (NGB). The NGB licensed 7,500 acres to the Oregon Military Department (OMD) for the purpose of a training installation for the Oregon Army National Guard (ORANG). In 2022, the Army plans to convey Parcel 1, which encompasses 9,511.46 acres, to the CDA under the BRAC authority for purposes of economic development. This FOST for Parcel 1 (the Property) does not evaluate or address Parcel 2, which encompasses 28.07 acres. The Army will not convey Parcel 2 until environmental remediation is complete with regulatory coordination, and a separate future FOST. In addition, the Oregon Department of Transportation (ODOT) currently has an easement for use of 109.27 acres for a

section of I-82 alongside the installation and the Highway 82/84 interchange. The ownership of these 109.27 acres will transfer to the Federal Highway Administration (FHWA) and subsequently to the Oregon Department of Transportation (ODOT) following a separate FOST. The Property consists of 9,511.46 acres (Parcel 1) (Enclosure 1, Map 1) and approximately 1,100 structures, including 565 storage igloos, over 100 buildings, roads, railroads, and electrical and water utility systems.

UMCD includes the former Umatilla Chemical Agent Disposal Facility (UMCDF), a multi-furnace incineration facility designed to dispose of the stockpile of chemical munitions that were stored at UMCD. Chemical Warfare Material (CWM) in the UMCD stockpile included munitions filled with blister agent HD (mustard) and the nerve agents GB (Sarin) and VX. The UMCDF consisted of numerous buildings, each providing a specific function for process support, maintenance, utilities, munitions handling and disassembly, agent destruction, and management of residual waste. The UMCDF was completed in 2001. CWM stockpile destruction operations began in 2004 and were completed in 2011, with chemical surety ending in March 2012. The multi-furnace incineration facility was demolished in 2014, completing the chemical demilitarization mission and leaving just the support buildings.

The Umatilla Army Depot Reuse Authority (UMADRA) was established to plan for the transfer of federal property for redevelopment and reuse by others. In August 2014, the UMADRA reorganized itself as an Implementation Local Redevelopment Authority (I-LRA). In September 2014, the I-LRA was recognized by The United States Department of Defense (DOD) and was renamed the Columbia Development Authority (CDA). The FOST property is to be transferred from the Army to the CDA as an Economic Development Conveyance under BRAC consistent with the intended reuse of the Property as set forth in the CDA Reuse Plan and is depicted in Table 1 below. A site map of the Property is attached (Enclosure 1, Map 1). The table below identifies acreage for proposed future land use for the Property.

**Table 1
Future Reuse Designation**

CDA Area Reuse	Acres
Wildlife Refuge	5,676.72
Industrial	989.57
Industrial/Restricted *	964.42
Industrial/Unrestricted **	888.32
UMCDF (Industrial/CDA Demil Area)***	276.56
Agriculture	691.60
Right-of-Way	24.27
Total Acreage in CDA Area:	9,511.46

* Industrial/Restricted is defined in the UMCD Redevelopment Plan as industrial use that is limited to the utilization of igloos for storage.

** Industrial/Unrestricted is defined as general industrial uses of the land.

*** The Industrial/CDA Demilitarization Area would also be utilized as an unrestricted industrial area, and is named as such only because of its use for chemical demilitarization activities, which ceased in 2012.

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the Property was made based upon the following documents:

Environmental Condition of Property Reports:

- USACE, 2010. U.S. Army Base Realignment and Closure (BRAC) Environmental Condition of Property Report Umatilla Chemical Depot – Oregon. August 2010.
- USACE, 2013. US Army BRAC 2013 Environmental Condition of Property Report Umatilla Chemical Depot – Oregon. September 2013.
- U.S. Army, 2017. U.S. Army Base Realignment and Closure (BRAC) Environmental Condition of Property Report Update Umatilla Chemical Depot – Oregon, For Transfer to the Columbia Development Authority, June 2017.
- U.S. Army, 2019. U.S. Army Base Realignment and Closure (BRAC) Environmental Condition of Property Report Update Umatilla Chemical Depot – Oregon, For Transfer to the Columbia Development Authority. July 2019.
- U.S. Army, 2021. U.S. Army Base Realignment and Closure (BRAC) Environmental Condition of Property Report Update Umatilla Chemical Depot – Oregon, For Transfer to the Columbia Development Authority. 1 December 2021.

USACE 2016 Environmental Assessment (EA) for Disposal and Reuse of Umatilla Chemical Depot, Oregon. August 2016.

U.S. Army, 2021. Final Finding of No Significant Impact (FNSI) Environmental Assessment of the Disposal and Reuse of Umatilla Chemical Depot, November 2021.

Brown, W., 1991. Final Environmental Impact Statement, Base Realignment and Closure, Umatilla Depot Activity. 1991.

Umatilla Army Depot Reuse Authority, 2010. U.S. Army Umatilla Chemical Depot Base Redevelopment Plan. August 2010.

The information provided is a result of a complete search of agency files during the development of these environmental surveys. A complete list of documents providing information on environmental conditions of the property is attached, Enclosure 2 (Environmental Documentation).

4. ENVIRONMENTAL CONDITION OF PROPERTY

Specific areas of UMCD have been classified into parcels of Environmental Condition of Property (ECP) types as defined by the American Society for Testing and Materials (ASTM Standard D)-5746-98, *Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities* (ASTM, 2016). The ECP map in Enclosure 1 (Map 2) illustrates the locations, condition types and approximate size within the Property. The ECP categories for applicable property are as follows:

ECP Category 1: These are areas or parcels of real property where no release or disposal of hazardous substance or petroleum products or their derivatives has occurred. The total acreage of

Category 1 property within Parcel 1 is 8,862.57 acres. Enclosure 1, Map 2 illustrates the Category 1 type areas with no shading.

ECP Category 2: These are areas or parcels of real property where only the release or disposal of petroleum products or their derivatives has occurred. Enclosure 1, Map 2 illustrates these areas in blue shading. Below is a list of the Type 2 areas totaling 8.62 acres.

- Site 43 Former Gas Station (4.00 acres)
- Former USTs (94 & 97) (1.90 acres)
- Former Airport Underground Storage Tank (UST) (1.50 acres)
- Former UST Southeast of Runway (1.22)

ECP Category 3: These are areas or parcels of real property where release, disposal or migration or some combination thereof of hazardous substances has occurred, but at concentrations that do not require removal or remedial action. Enclosure 1, Map 2 illustrates these areas in green shading. Below is a list of the Type 3 areas totaling 105.53 acres.

- Building 202 area (2.00 acres)
- Southwestern Warehouses and Site 69, Skunkworks (10.00 acres)
- Building 100 Warehouses (12.70 acres)
 - Site 35 Malathion Storage Leak Area
 - Site 37 Building 131 Paint Sludge Discharge Area
 - Site 46 Railcar Unloading Area
 - Site 68 Unsymmetrical dimethyl hydrazine (UDMH) Operation Area
 - Building 129
 - Building 101 and nearby UST
- Site 81-1 Former Raw Material Storage Locations (6.7 acres)
- Site 81-2 Former Raw Material Storage Locations (3.4 acres)
 - Site 66 Brass, Cooper and Steel Storage Area
- Site 10 Mustard Agent (HD) Storage Area (8.60 acres)
- Site 51 Large Open Areas (24.2 acres)
 - Site 62 Paint and Solvent Disposal Area
- Building 421 (0.03 acres)
- Site 50 Railroad Landfill Areas (10 acres)
- Site 61 Open Paint Spray Areas (21.7 acres)
- Site 79 Malathion Spray Area (2.2 acres)
- Site 44 I Road Oil Application/Disposal Sites (4.0 acres)

ECP Category 4: These are areas or parcels of real property where release, disposal or migration, or some combination thereof, of hazardous substances has occurred, and all remedial action necessary to protect human health and the environment have been taken. Enclosure 1, Map 2 illustrates these areas in purple shading. Below is a list of the Type 4 areas totaling 534.74 acres.

- Deactivation Furnace Area (15.8 acres):
 - Site 1 Deactivation Furnace (1.2 acres)
 - Site 25 I Metal Ore Piles (3.3 acres)
 - Site 26 Metal Ingot Stockpile (11.0 acres)
 - Site 44 II Road Oil Application/Disposal Building 210 (0.3 acres)
- UMCDF (63.20 acres)¹
- Explosive Washout Lagoons Groundwater Plume (177.25 acres)
- Site 34 Closed Active Landfill (17.49 acres)
- Site 39 Quality Assurance (QA) Function Range (259.0 acres)
- J-Block (2.0 acres)

A summary of the ECP categories and the ECP category definitions are provided in Enclosure 3 (Table 1 Description of Property).

4.1. ENVIRONMENTAL REMEDIATION SITES

The Army’s program for performing Remedial Actions (RAs) is known as the Installation Restoration Program (IRP). There are twenty-two (22) IRP sites located on the Property with response actions implemented under CERCLA or corrective actions implemented under the Resource Conservation and Recovery Act (RCRA). These specific portions of the Property were not remediated to levels suitable for unrestricted use but were remediated to industrial use allowances that are consistent with the CDA’s reuse plan. Table 4 below is a listing of the environmental sites.

Sites which have not been remediated for unrestricted use require Land Use Controls (LUCs) as part of the final remedy. Remedial actions implemented under CERCLA were documented in Records of Decision (RODs), which set forth the selected remedial actions, define the clean-up standards and, included a LUC remedy component to be implemented following active remediation. The LUCs for sites addressed under RCRA are required in accordance with the applicable permit closure documents. The LUCs are or will be documented in three places: LUC Remedial Design (LUCRD); conveyance deed Environmental Protection Provisions; and within a state authorized Easement and Equitable Servitude (EES) that will be executed and recorded prior to conveyance of the property to the CDA.

**Table 4
Environmental Remediation Sites**

Operable Unit	ECP Study Site No.	Site Name	Status	ROD Date
None	43	Former Gas Station/ Possible UST Location	A gasoline station was once located in the central portion of UMCD, at the intersection of Rim and Center Roads. No	

¹ The entire UMCDF area is 276.56, but only 63.20 acres are category type 4.

Operable Unit	ECP Study Site No.	Site Name	Status	ROD Date
			action was required per the 1995 UST Investigation Report.)	
None	51	Large Open Areas (Vicinity of EWL)	Study Site 51, known as the Northern Large Storage Area, is located northeast of the Explosives Washout Lagoons and northwest of Rim Road and the C-Block igloos. The area had been used as a gravel borrow pit. Low levels of metals and SVOCs were detected in the samples from the two locations. VOCs were not detected in the samples. Based on these results, no actions were deemed necessary.	
None	61	Open Paint Spray Areas	These areas were reportedly used in the 1950s and 1960s to conduct outdoor spray-painting. No action was necessary.	
None	62	Paint and Solvent Disposal Area	This area is located along the Coyote Coulee north of the Explosives Washout area. Reports of disposal of paint and solvent waste generated from a building formerly located east of the disposal location. No action was necessary.	
None	66	Brass, Copper, and Steel Storage Area	This site is located near the railroad tracks south of Igloo Block H. Aerial photographs and UMCD employees reported that copper, brass, and steel were stored at this site after being unloaded from the railcar. No action was necessary.	
None	68	UDMH Operations Area (Building 129)	Located within the Deactivation Furnace and Southwestern Warehouse Area, building 129 was used to conduct stability test of UDMH and, potentially, red fuming nitric acid. Waste materials from the testing operations were drained through lead-lined pipes into a lime pit. No action was necessary.	
None	69	Skunk Works Area	Located within the Deactivation Furnace and Southwestern Warehouse Area, this area was reported to be used for cleaning of copper and brass cartridges in hydrochloric acid baths and WEDAC (commercial cleaner) solutions. No action was necessary.	
None	79	Malathion Spray Areas	Located in the northeast corner of Igloo Block C, this area is reported to have been sprayed with the insecticide Malathion during a commercial over-flight operation near UMCD. No action was necessary.	
Deactivation Furnace	1	Deactivation Furnace	In July of 1992, the Deactivation Furnace was decontaminated and removed from the site and disposed or salvaged as nonhazardous solid waste during an	December 1992/ESD 2020

Operable Unit	ECP Study Site No.	Site Name	Status	ROD Date
			RCRA closure action. During the RCRA closure action, hazardous waste (e.g. baghouse ash and rinse water) was disposed at the RCRA-permitted hazardous waste treatment, storage, and disposal (TSD) facility. No further action was necessary. LUCs were implement as required in the 2020 ESD.	
Explosives Washout Lagoon Groundwater	4	Explosives Washout Lagoons	The ROD identified pump and treat as the selected remedy for treatment of groundwater contamination. The contaminated groundwater remediation infrastructure, a pump and treat facility with extraction wells, was constructed in 1995 and brought online in 1996 to remove explosives from the groundwater. A Operating Properly and Successfully (OPS) determination was approved in November 2016.	July 1994
Misc.	10	Mustard Agent HD Storage Area	The 1994 Miscellaneous Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk range, non-carcinogenic hazard levels, and action levels for lead at this site, and documented the NFA decision for this site. No LUCs are necessary for this site.	June 1994
Closed Active Landfill	34	Closed Active Landfill	A Remedial Investigation (RI) was conducted in 1992, with groundwater sampling activities performed at ten adjacent monitoring wells. Analyses performed on the groundwater samples include: Target Analyte List (TAL) inorganics (which includes metals, non-metallic elements, and cyanide), Volatile Organic Compounds (VOCs), semi-volatile organic compounds (SVOCs), pesticides, Polychlorinated Biphenyls (PCBs), explosive constituents, and nitrate/nitrite. The RI results found elevated nitrate/nitrite and selenium levels, which are believed to be unrelated to landfill activities. The landfill has been closed IAW ODEQ solid waste regulations in 1997. The 2020 ESD documents LUCs to protect the integrity of the cap.	March 1993/ESD 2020
Misc.	25 I	Metal Ore Piles	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk	June 1994

Operable Unit	ECP Study Site No.	Site Name	Status	ROD Date
			range, non-carcinogenic hazard levels, and action levels for lead at this site, and documented the no action decision for this site. No LUCs are necessary for this site.	
Misc.	26	Metal Ingot Stockpile	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk range, non-carcinogenic hazard levels, and action levels for lead at this site, and documented the no action decision for this site. No LUCs are necessary for this site.	June 1994
Misc.	109	Paint Spray and Shot Blast Areas	The 1994 Miscellaneous Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk range, non-carcinogenic hazard levels, and action levels for lead at this site, and documented the no action decision for this site. No LUCs are necessary for this site.	June 1994
Misc.	35	Malathion Storage Leak Areas	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk and non-carcinogenic hazard levels and action levels and documented the no action decision for this site. No LUCs are necessary for this site.	June 1994
Misc.	37	Building 131 Paint Sludge Discharge Area	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk and non-carcinogenic hazard levels and action levels and documented the no action decision for this site. No LUCs are necessary for this site.	June 1994
Quality Assurance Function Range	39	QA Function Range	The ROD required that 107 acres associated with the Rifle Range Area and 68 acres associated with the Test Pit Area undergo munitions and explosives of concern (MEC) clearance to a depth of two feet, and that one acre associated with the Test Pad Area be cleared to a depth of six feet. It also required that the soil around the three former QA function test pads, where high density geophysical anomalies were found during	May 2005/MFR 2021

Operable Unit	ECP Study Site No.	Site Name	Status	ROD Date
			<p>investigations, to be sifted to a depth of two feet.</p> <p>The MEC response for the 176 acres was completed in November 2008, and an After Action Report documenting completion of removal activities was submitted to the Department of Defense Explosive Safety Board (DDESB) and receipt acknowledged on 6 December 2010 to close out the 176-acre portion of the Explosive Safety Submission (ESS). On 16 March 2011, the DDESB approved no further action for the remaining 464 acres, closing out the remainder of the ESS and, thereby, allowing the transfer of Site 39. No further action with the implementation of LUCs.</p>	
Misc.	44 (I & II)	Road Oil Application/Disposal Sites	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk and non-carcinogenic hazard levels and action levels and documented the no further decision for this site. No LUCs are necessary for this site.	June 1994
Misc.	46	Railcar Unloading Area	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk and non-carcinogenic hazard levels and action levels and documented the no further decision for this site. No LUCs are necessary for this site.	June 1994
Misc.	50	Railroad Landfill Area	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk and non-carcinogenic hazard levels and action levels and documented the no action decision for this site. No LUCs are necessary for this site.	June 1994
Misc.	81 (-1&-2)	Former Raw Material Storage Locations	The 1994 Misc. Sites ROD states that the potential risks associated with human exposure to soil contamination are within or below acceptable carcinogenic risk and non-carcinogenic hazard levels and action levels and documented the no action decision for this site. No LUCs are necessary for this site.	June 1994

4.2. STORAGE, RELEASE, OR DISPOSAL OF HAZARDOUS SUBSTANCES

Hazardous substances were stored for one year or more, released or disposed of on the Property in excess of reportable quantities specified in 40 CFR Part 373. All hazardous substance storage operations have been terminated on the Property. Hazardous substances were stored or released in excess of the 40 CFR 373 reportable quantities at the sites listed below. The release or disposal of these hazardous substances was addressed at the time of the discovery of the release as an immediate spill response or under the Installation Restoration Program (IRP). A summary of the buildings or areas in which hazardous substance activities occurred is provided in Enclosure 4, Table 2 – Notification of Hazardous Substance Storage, Release, or Disposal. The CERCLA 120(h)(3) Notice, Description, and Covenant at Enclosure 7 will be included in the Deed.

- Deactivation Furnace OU, Site 1
- Explosives Washout Lagoon, Site 24
- Mustard Chemical Agent Open Storage Area, Site 10
- Closed Active Landfill, Site 34
- Metal Ore Piles, Site 25 (I&II)
- Metal Ingot Stockpile, Site 26
- Malathion Storage Leak Area, Site 35
- Building 131 Paint Sludge Discharge Area, Site 37
- Quality Assurance Function Range, Site 39
- Road Oil Application/Disposal Sites, Site 44 (I&II)
- Railcar Unloading Area, Site 46
- Drill and Transfer Area, Site 49
- Railroad Landfill Areas, Site 50
- Large Open Areas in the Vicinity of Coyote Coulee, Site 51
- Outdoor Spray Paint Area, Site 62 and Site 61
- Brass, Copper and Steel Storage Area, Site 66
- Building 129, UDMH Operations Area, Site 68
- Skunk Works Area, Site 69
- Malathion Spray Area (Northeast Corner of C-Block), Site 79
- Raw Materials Storage Locations, Site 81 (I&II)
- J-Block Igloos
- RCRA Permitted CSF
- Building 115 Satellite Accumulation Area
- Building 203 RCRA Permitted CSF
- UMCDF

All hazardous substances storage operations have been terminated on the Property.

4.3. PETROLEUM AND PETROLEUM PRODUCTS

4.3.1. Underground and Aboveground Storage Tanks (UST/AST). UST/AST locations are identified on Enclosure 1 Map 4.

Current UST/AST Sites: There are no underground storage tanks (UST) and two above-ground storage tanks (AST) currently present on the Property.

- 280 gallon fuel oil tank near Building 133
- 2000 gallon fuel oil tank at Building 403

There is no evidence of petroleum releases from these sites.

Former UST/AST Sites:

There were thirty-four (34) underground and six above-ground petroleum storage tanks (UST/AST) on the Property that were removed. The UST's are described in Enclosure 5 (Table 3 Notification of Petroleum Product Storage, Release, or Disposal). Any releases of petroleum products were addressed at the time of discovery or as part of UST/AST closure.

4.3.2. Non-UST/AST Storage, Release, or Disposal of Petroleum Products

In July 1995, two tanks (94 and 97) were removed that were associated with “blow-down” structures related to a boiler and air compressor system at Building 433 on Birch Road. Petroleum-contaminated soil was present as a result of spills around the fill pipes or leaks from damaged piping. After excavation, soil samples were collected, and if laboratory analysis indicated the presence of Total Petroleum Hydrocarbons (TPH) contamination above cleanup levels, further over-excavation and sampling occurred until such contamination was removed. Confirmation samples collected at each excavation confirmed all petroleum-contaminated soil had been removed at each tank site. Excavations were backfilled with clean soil.

4.4. POLYCHLORINATED BIPHENYLS (PCB)

According to UMCD records, there were 239 transformers throughout the entire installation. All transformers were tested for PCBs in 1989. If any contained more than 10 ppm of PCBs, they were replaced. They were stored in the RCRA permitted CSF in building 203 until they were disposed. No spills were associated with their storage. There is no evidence that any PCB containing equipment remains on the property.

4.5. ASBESTOS

There is Asbestos Containing Material (ACM) in the buildings listed in Enclosure 9 (Asbestos Survey Results). The ACM includes: fire suppression equipment, transite boards, caulking, and roof shingles. *See Dames and Moore, 1992a, Final Asbestos Assessment Survey, Umatilla Depot Activity, Hermiston, Oregon, August 1992 and USACE, 2013 US Army BRAC 2013 Environmental Condition of Property Report Umatilla Chemical Depot, Oregon, September 2013.* Walkthrough surveys were conducted as part of the 2019 ACM Survey Re-Inspection and any remaining ACM is in good condition. Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the property transferee assumes responsibility under the deed for abatement or management of any ACM in accordance with applicable federal, state and

local requirements. The deed will include an asbestos warning and covenant, see Enclosure 8 (Environmental Protection Provisions).

4.6. LEAD-BASED PAINT (LBP)

Enclosure 10 (Lead-Based Paint Sample Results) contains a list of the buildings on the Property known or presumed to contain LBP. A quantitative LBP survey was conducted at UMCD for the 1996 CERFA report. *See Hart Crowser, 1996, Lead-Based Paint Survey, Umatilla Army Depot Activity, Umatilla, Oregon. Prepared for U.S. Army Corps of Engineers, Seattle District, Dec. 1996, for more information.*

The Property was not used for residential purposes and the grantee does not intend to use the Property for residential purposes in the future. The deed will include a lead based paint warning and covenant.

4.7. RADIOLOGICAL MATERIALS

Igloo 928 is the only building in the CDA area that stored radiological material. There is no evidence of any release of radiological materials at these buildings. In June 2016 the US Army Public Health Center (APHC) conducted a Radiation Protection Survey at UMCD. In their final report, the APHC concluded that Igloo 928 met the Nuclear Regulatory Commission release criteria for unrestricted release (US Army Public Health Center, 2016).

4.8. RADON

Radon surveys were conducted in 252 buildings on the Property. Radon was not detected above the EPA residential action level of 4 picocuries per liter (pCi/L) in these buildings.

4.9. OTHER PROPERTY CONDITIONS

There are no other hazardous conditions on the Property that present an unacceptable risk to human health or the environment.

4.10. MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

Based on a review of existing records and available information, there was evidence that Munitions and Explosives of Concern (MEC) were present on the Property. The term "MEC" means military munitions that may pose unique explosives safety risks, including:

- (A) unexploded ordnance (UXO), as defined in 10 U.S.C. §101(e)(5)
- (B) discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or
- (C) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

A 640 acre area was previously used for ammunition disposal in Study Site 39, the QA Function Range. The QA Function Range is located in the northeast corner of UMCD. From 1945 to 1975 this site was used as a rifle and pistol range, and from 1945 to 1970 flares, photoflash grenades, and

mines were tested in the southern portion of the site. A geophysical survey of the site was conducted and remedial actions for 176 acres have been completed.

Based on conclusions from the After Action Report (AAR) completed after the completion of the remedial actions conducted under the ROD, the Army determined that there is a low potential for encountering MEC at Site 39 for 176 acres and that no further removal action is necessary. The Department of Defense Explosives Safety Board (DDESB) concurred with this determination on 6 December 2010. The DDESB approved a no further action for the remaining 464 acres on 16 March 2011 closing out the remainder of the Explosive Safety Submission (ESS) and, thereby, allowing the transfer of Site 39.

The ROD lists the acreage for two areas as approximately 176 acres for the clearance area and 464 acres for the area not suspected of containing munitions. For a practical purpose, to implement a LUC, a Memorandum for the Record (MFR) to the ROD dated 4 May 2021 clarified the LUC area for the 176 acres by expanding the clearance area from 176 acres to 259 acres and shrinking the non-suspect area to 376.68 acres. The reason for this alteration is that the 176-acre clearance area was comprised of three non-contiguous sub-areas, and by adding acreage to connect these sub-areas to make one contiguous 259-acre area the Army obtained a single legal parcel description for the LUC to encompass the clearance area.

The QA Function Range After Action Report, detailing the MEC Removal at the site, and the DDESB approval letters for the cleanup of the 176 acres with no further action for the remaining 464 acres are listed in the environmental documentation. Given the Property's past use, the deed will include Enclosure 6 (Table 4 Notification of Munitions and Explosives of Concern) which includes a summary of MEC discovered on the property. A deed restriction in regard to site 39 and a MEC Notice are in Enclosure 8 (Environmental Protection Provisions).

5. ADJACENT PROPERTY CONDITIONS

The following conditions exist on adjacent property to Parcel 1:

- Ammunition Demolition Area (ADA): In addition to MEC the ADA, (Enclosure 1, Map 2) was investigated for contaminants of concern in soils that may pose a threat to human health or the environment. A remedial action was selected in the ROD for the ADA area, that will also address contamination that exists beyond the federal boundary fence of the ADA, however, the remediation of such contamination, including MEC, is not yet complete. This effort may result in dust and noise that may impact the Property. While the work will be about a half mile north of the Property there may be noise from the controlled detonation of unexploded ordnance by appropriately trained personnel. Groundwater monitoring is ongoing at the ADA.
- ORARNG Firing Range/Training Area: This area (Enclosure 1, Map 2) is a military training reservation that includes live fire weapons ranges, mounted and dismounted maneuver activity areas, heavy tracked vehicles maneuver areas, and aircraft landing/take-off areas. For that reason, the Property may periodically experience noise and other characteristics typical of military training operations (for example: noise from weapons

firing ranges and low-level aircraft overflights, vibration from tank maneuvers, dust, or odors).

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

The following environmental orders/agreements are applicable to the property:

- Federal Facility Agreement (Septmeber 1989)
- RCRA permit (UMCD Permit # OR6 213 820 917)

All remediation activities on the Property required by the FFA are completed or in place and operating properly and successfully (See Section 4.1 Environmental Remediation Sites). The deed will include a provision reserving the Army's right to access the property to conduct additional remediation activities if those should prove to be necessary.

7. REGULATORY/PUBLIC COORDINATION

The U.S. Environmental Protection Agency (EPA) Region 10, the Oregon Department of Environmental Quality (ODEQ), and the public were notified of the initiation of this FOST. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate. A copy of the regulatory/public comments and the Army response to those comments will be included at Enclosures 12 and 13.

8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts associated with the proposed transfer of the Property have been analyzed in accordance with the NEPA. The results of this analysis are documented in the Environmental Assessment (EA) dated August 2016, and the Finding of No Significant Impact (FNSI), dated 11 November 2022.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the above information, I conclude that all removal or remedial actions necessary to protect human health and the environment have been taken and the Property is transferable under CERCLA section 120(h)(3). In addition, all Department of Defense requirements to reach a finding of suitability to transfer have been met, subject to the terms and conditions set forth in the attached Environmental Protection Provisions that shall be included in the deed for the Property. The deed will also include the CERCLA 120(h)(3) Notice, Covenant, and Access Provisions and Other Deed Provisions. Finally, the hazardous substance notification (Table 2) shall be included in the deed as required under the CERCLA Section 120(h) and DOD FOST Guidance.

Amy L. Borman
Deputy Assistant Secretary of the Army
(Environment, Safety and Occupational Health)

ENCLOSURES

- Enclosure 1 -- Maps of Property
 - Map 1: Reuse Map
 - Map 2: Environmental Condition of Property Category Code Map
 - Map 3: Maps of LUC areas and Legal Descriptions
 - Exhibit A: RCRA and CERCLA Sites
 - Exhibit B: Closed RCRA Hazardous Waste Management Units
 - Exhibit C: Closed Active Landfill Operable Unit
 - Exhibit D: Quality Assurance Function Range Operable Unit
 - Exhibit E: Deactivation Furnace Operable Unit
 - Exhibit F: Explosive Washout Lagoon Groundwater Operable Unit
 - Map 4: Historic UST and AST Locations
 - Map 5: Installation Building Map with Numbered Study Sections
- Enclosure 2 -- Environmental Documentation
- Enclosure 3 -- Table 1 Description of Property
- Enclosure 4 -- Table 2 Notification of Hazardous Substance Storage, Release, or Disposal
- Enclosure 5 -- Table 3 Notification of Petroleum Product Storage, Release, or Disposal
- Enclosure 6 -- Table 4 Notification of Munitions and Explosives of Concern
- Enclosure 7 -- CERCLA Notice, Covenant, and Access Provisions and Other Deed Provisions
- Enclosure 8 -- Environmental Protection Provisions
- Enclosure 9 -- Asbestos Survey Results
- Enclosure 10 -- Lead-Based Paint Sample Results
- Enclosure 11 -- Regulatory/Public Comments
- Enclosure 12 -- Army Response to Comments

Enclosure 1

MAPS OF PROPERTY

Map 1: Reuse Map

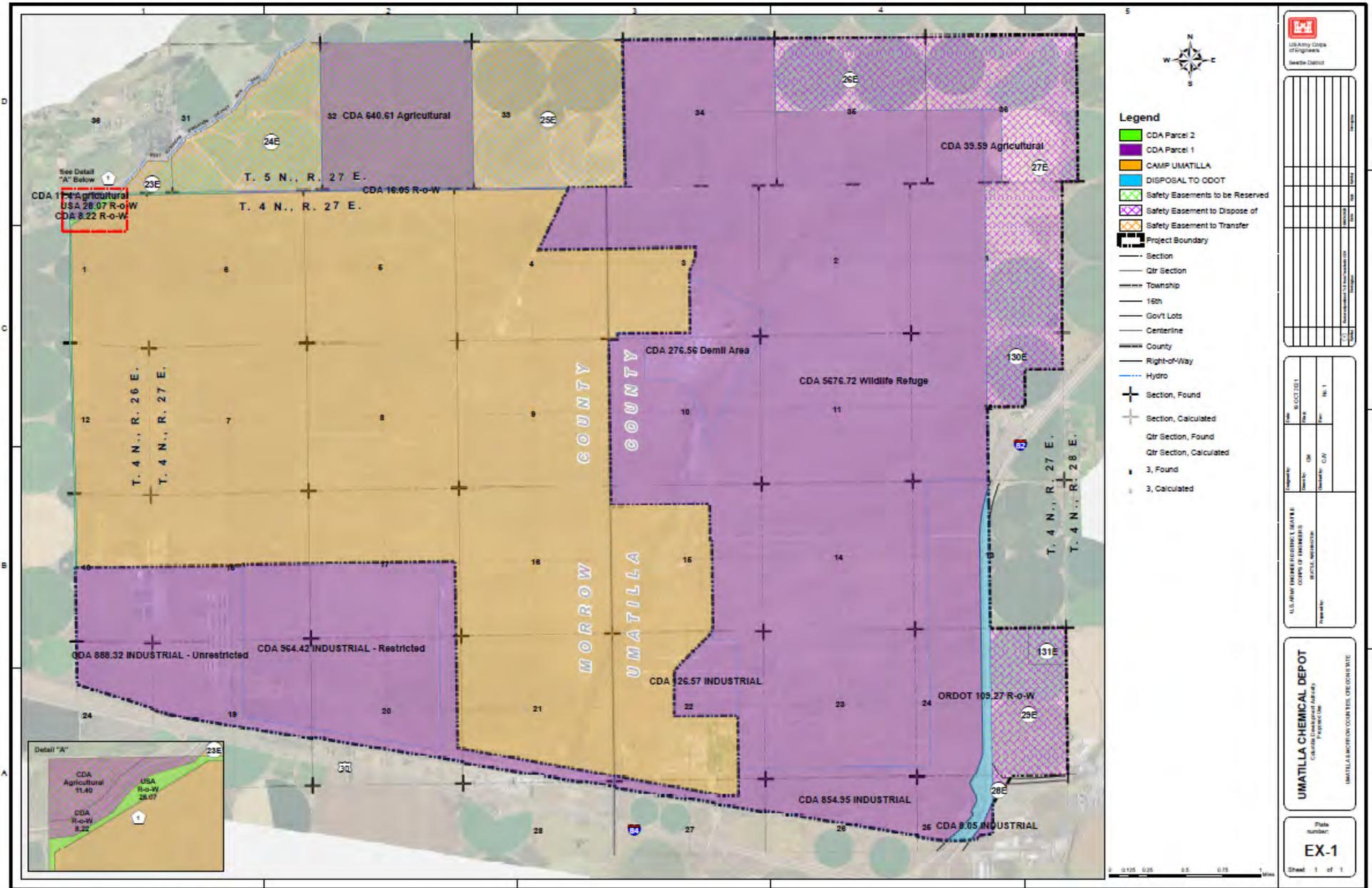
Map 2: Environmental Condition of Property Category Code Map

Map 3: Maps of LUC areas and Legal Descriptions

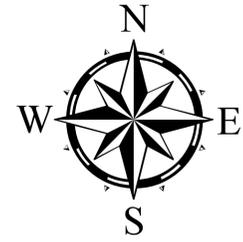
Map 4: Historic UST and AST Locations

Map 5: Installation Building Map with Numbered Study Sections

Map 1: Reuse Map



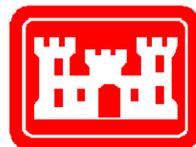
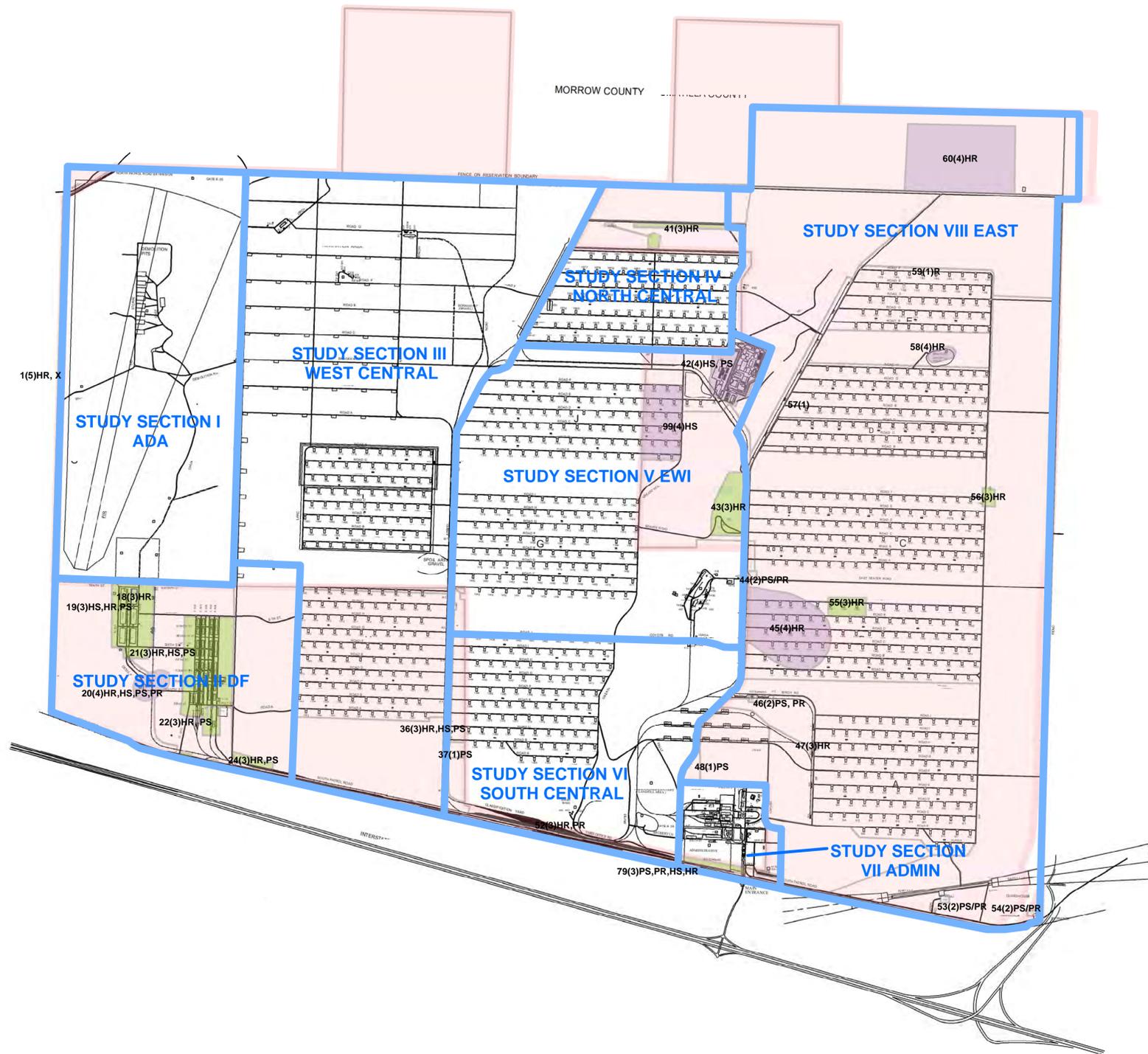
Map 2: Environmental Condition of Property Category Code Map



Legend

- Study Sections
- Condition of Property**
- 1 No Documented or Known Release (NDKR)
- 2 Release or Disposal of Petroleum Only
- 3 Release below action levels
- 4 Remediation of historic release has occurred
- 5 Remedial actions are underway
- 6 Release above action levels no remediation underway
- 7 Unevaluated
- CDA Property

ECP Condition Type	Total Acreage at UMCD	Definition	Map Color
1	8,971.84	Areas in which no release or disposal of hazardous substances or petroleum products above de minimis quantities has occurred and to which there has been no migration of such substances from adjacent areas	Clear
2	8.62	Areas in which release or disposal of petroleum products above de minimis quantities has occurred.	Blue
3	105.53	Area in which release, disposal, or migration of hazardous substances has occurred, but in concentrations that do not require removal or other remedial response.	Green
4	534.74	Area in which release, disposal, or migration of hazardous substances has occurred, but all removal or other remedial actions necessary to protect human health and the environment have been taken	Purple
5	28.07	Areas in which release, disposal, or migration of hazardous substances has occurred, and removal or other remedial actions are underway, but all required actions have not been taken	Yellow
6	0	Areas in which release, disposal, or migration of hazardous substances has occurred, but required remedial actions have not been implemented.	Orange
7	0	Areas that have not been evaluated or that require additional evaluation.	Red



UMATILLA CHEMICAL DEPOT Umatilla, Oregon		Environmental Condition of Property Category Codes for Columbia Development Authority Property	
LAST REVISION: 10/29/2020		MAP AUTHOR: SCJ	DEPT: Geospatial

MAP 3 EXHIBIT A

UMCD Maps Showing RCRA and CERCLA Sites

Map 5: RCRA and CERCLA Sites



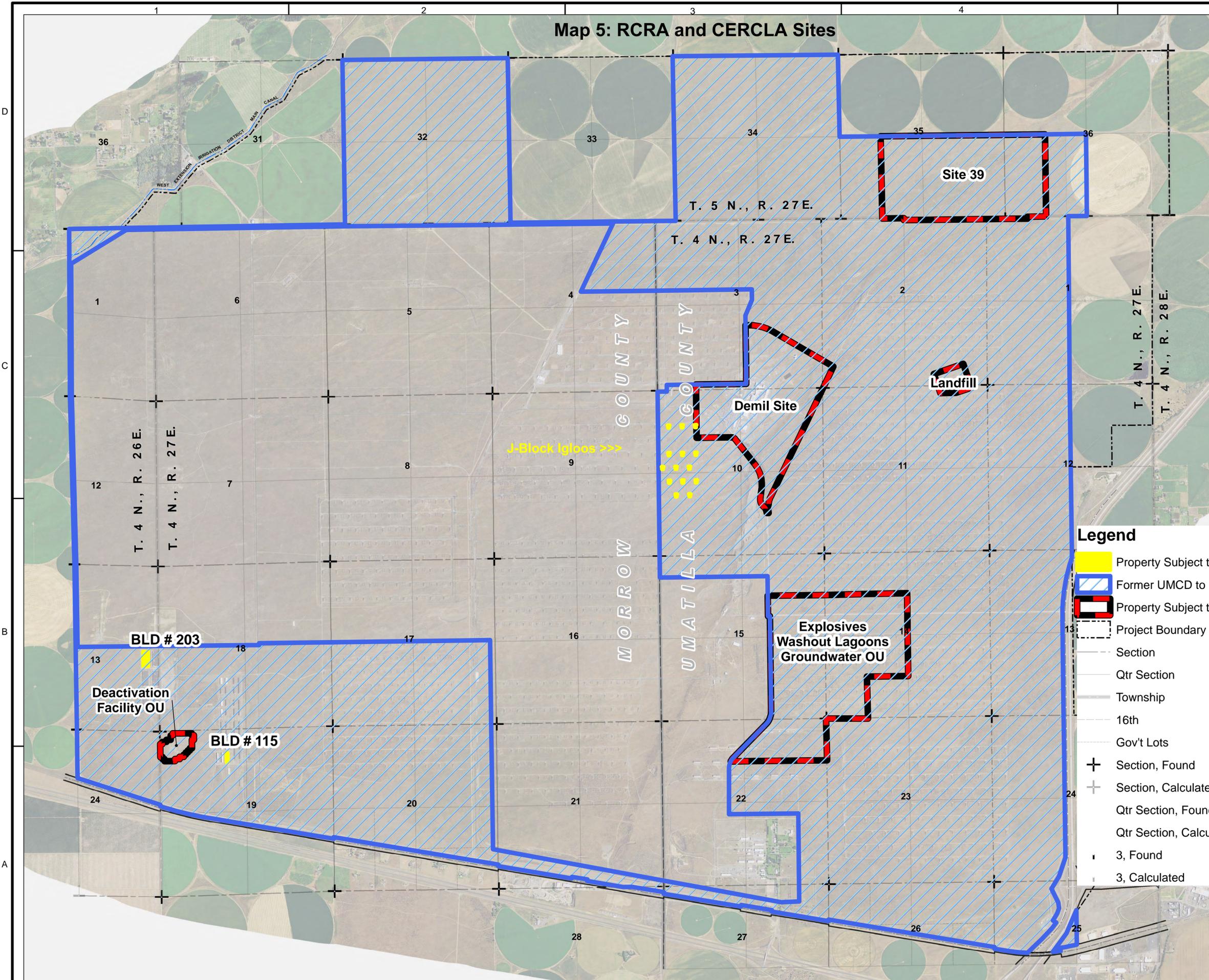
US Army Corps of Engineers
Seattle District

Symbol	Description	Date	Appr.	Symbol	Description

Designed by:	Date: MM/DD/YYYY
Drawn by:	File #: SEE SE-RE-TR
Checked by:	Rev:
U.S. ARMY ENGINEER DISTRICT, SEATTLE CORPS OF ENGINEERS SEATTLE, WASHINGTON	SEATTLE DIVISION REGULATORY DIVISION CDA/STRAL
Prepared by:	

LAND MANAGEMENT MAP
UMATILLA CHEMICAL DEPOT
CDA RESTRICTIONS
UMATILLA & MORROW OREGON

Plate number:
X-100
Sheet 1 of 1



Legend

- Property Subject to Land Use Restrictions
- Former UMCD to be transferred out of federal control
- Property Subject to Land Use Restrictions
- Project Boundary
- Section
- Qtr Section
- Township
- 16th
- Gov't Lots
- Section, Found
- Section, Calculated
- Qtr Section, Found
- Qtr Section, Calculated
- 3, Found
- 3, Calculated

MAP 3 EXHIBIT B

**Legal Description and Survey
of
Closed RCRA Hazardous Waste Management Units**

Building 115

Building 203

J-Block Igloos:

1735

1736

1750

1751

1752

1765

1766

1767

1780

1781

1782

1808

1809

1810

UMCDF

LEGAL DESCRIPTION

A building situated on Tract 16 in Section 19, Township 4 North, Range 27 East, Willamette Meridian, Morrow County, Oregon described as follows:

COMMENCING at Camp Rees Monument No. 6 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south $51^{\circ}47'57''$ east, a distance of 6,002.90 feet, more or less, to the southwest corner of said building and the **POINT OF BEGINNING**;

Thence north $89^{\circ}25'32''$ east, a distance of 60.00 feet;

Thence north $00^{\circ}34'28''$ west, a distance of 302.00 feet;

Thence south $89^{\circ}25'32''$ west, a distance of 60.00 feet;

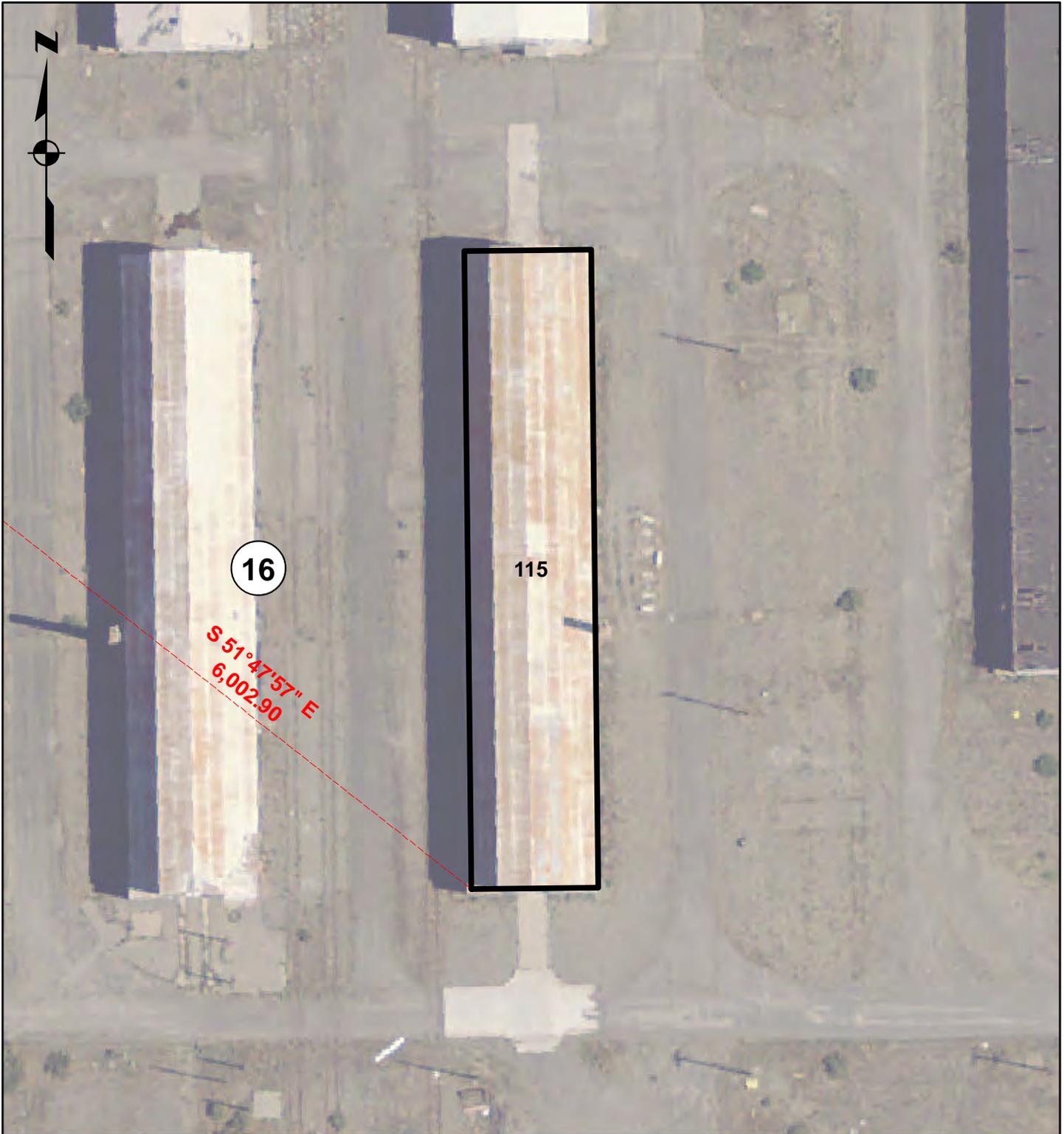
Thence south $00^{\circ}34'28''$ east, a distance of 302.00 feet to the **POINT OF BEGINNING**.

Containing 18,120.00 square feet, more or less.

This Legal Description is not based on an actual survey



Umatilla Chemical Depot Building No. 115



Legend

- Buildings
- Building COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer, and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

LEGAL DESCRIPTION

A building situated on Tract 11 in Section 13, Township 4 North, Range 26 East, Willamette Meridian, Morrow County, Oregon described as follows:

COMMENCING at Camp Rees Monument No. 6 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south $72^{\circ}29'32''$ east, a distance of 2,143.26 feet, more or less, to the southwest corner of said building and the **POINT OF BEGINNING**;

Thence north $89^{\circ}07'15''$ east, a distance of 181.00 feet;

Thence north $00^{\circ}52'45''$ west, a distance of 482.50 feet;

Thence south $89^{\circ}07'15''$ west, a distance of 181.00 feet;

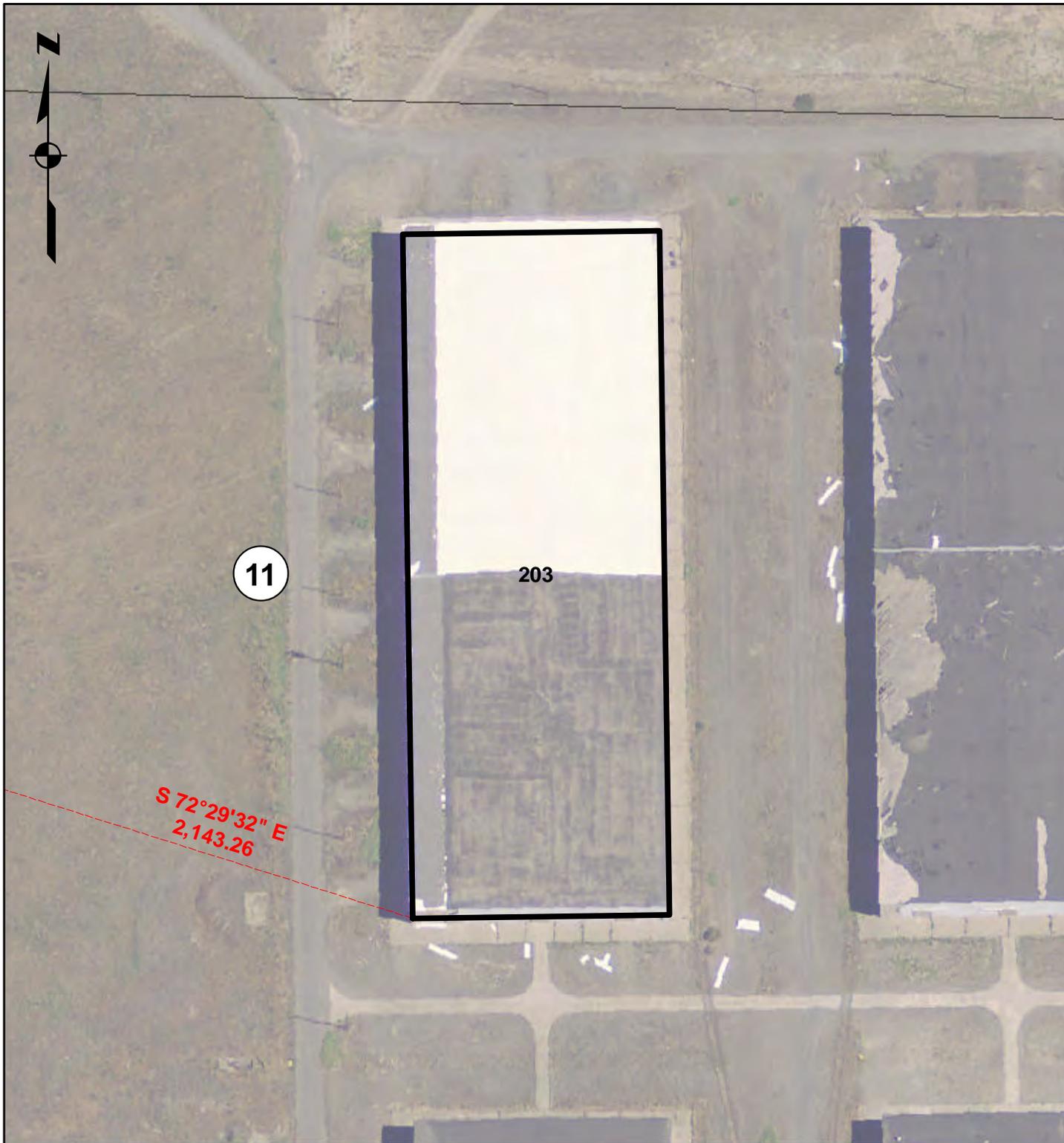
Thence south $00^{\circ}52'45''$ east, a distance of 482.50 feet to the **POINT OF BEGINNING**.

Containing 87,332.50 square feet, more or less.

This Legal Description is not based on an actual survey



Umatilla Chemical Depot Building No. 203



Legend

-  Buildings
-  Building COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any form whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1735

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 09°53’23” east, a distance of 3,325.02 feet, more or less, to point “A” and the **POINT OF BEGINNING;**

- Thence north 00° east, a distance of 6.00 feet;
- Thence north 90° west, a distance of 61.50 feet;
- Thence south 00° west, a distance of 6.00 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.;**

Containing 0.008 acres, more or less.

Building:

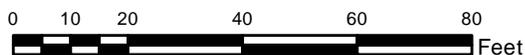
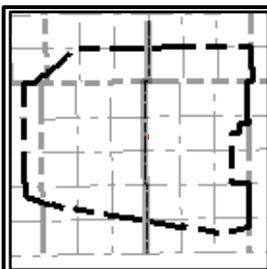
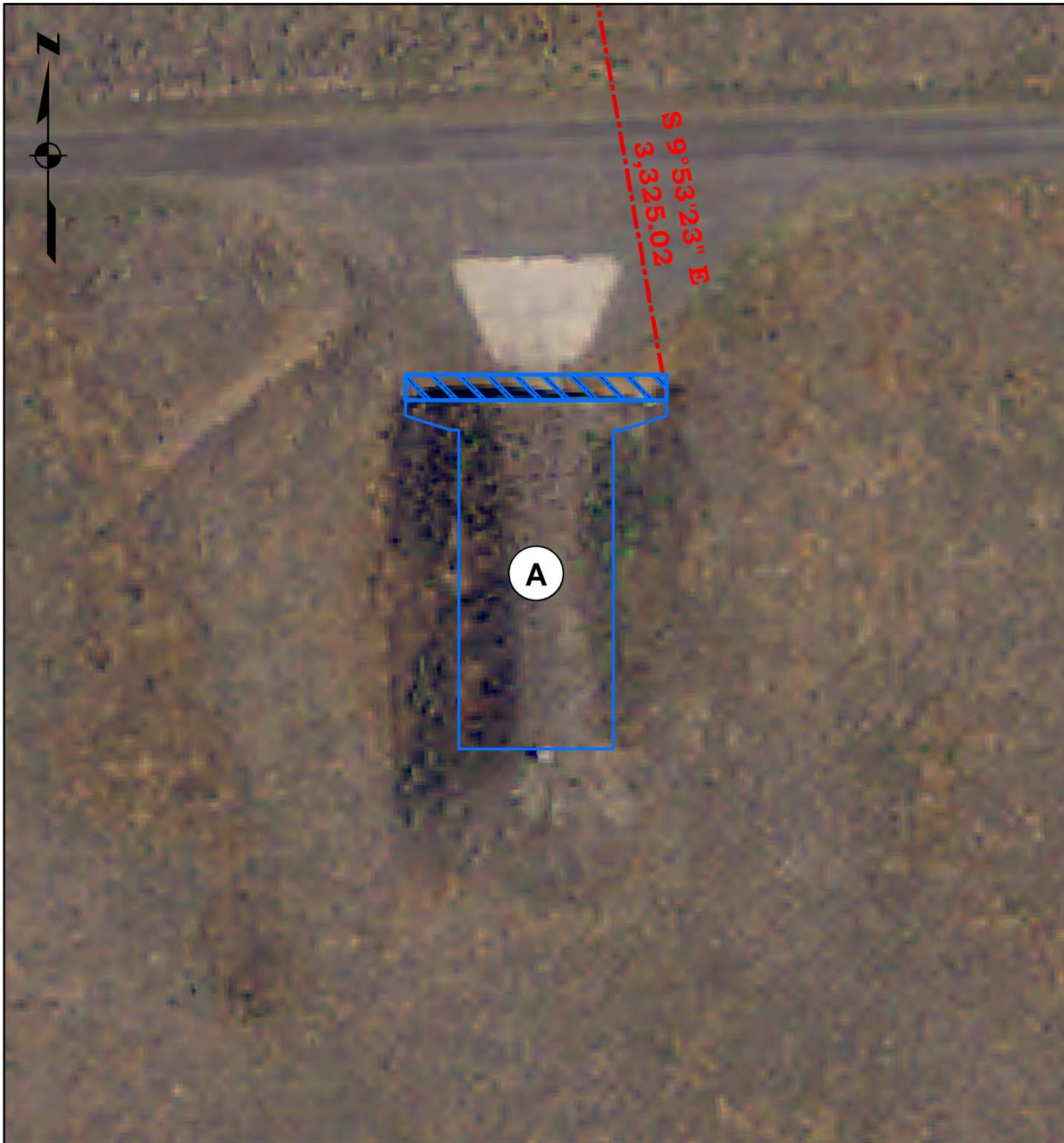
- BEGINNING** at point “A” as mentioned above;
- Thence south 00° west, a distance of 3.75 feet;
- Thence south 72°48’05” west, a distance of 10.991 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence south 00° west, a distance of 75.167 feet;
- Thence south 90° west, a distance of 36.50 feet;
- Thence north 00° east, a distance of 75.167 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence north 72°48’05” west, a distance of 10.991 feet;
- Thence north 00° east, a distance of 3.75 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1735



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1736

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 17°03' east, a distance of 3,418.64 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48'05” west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48'05” west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

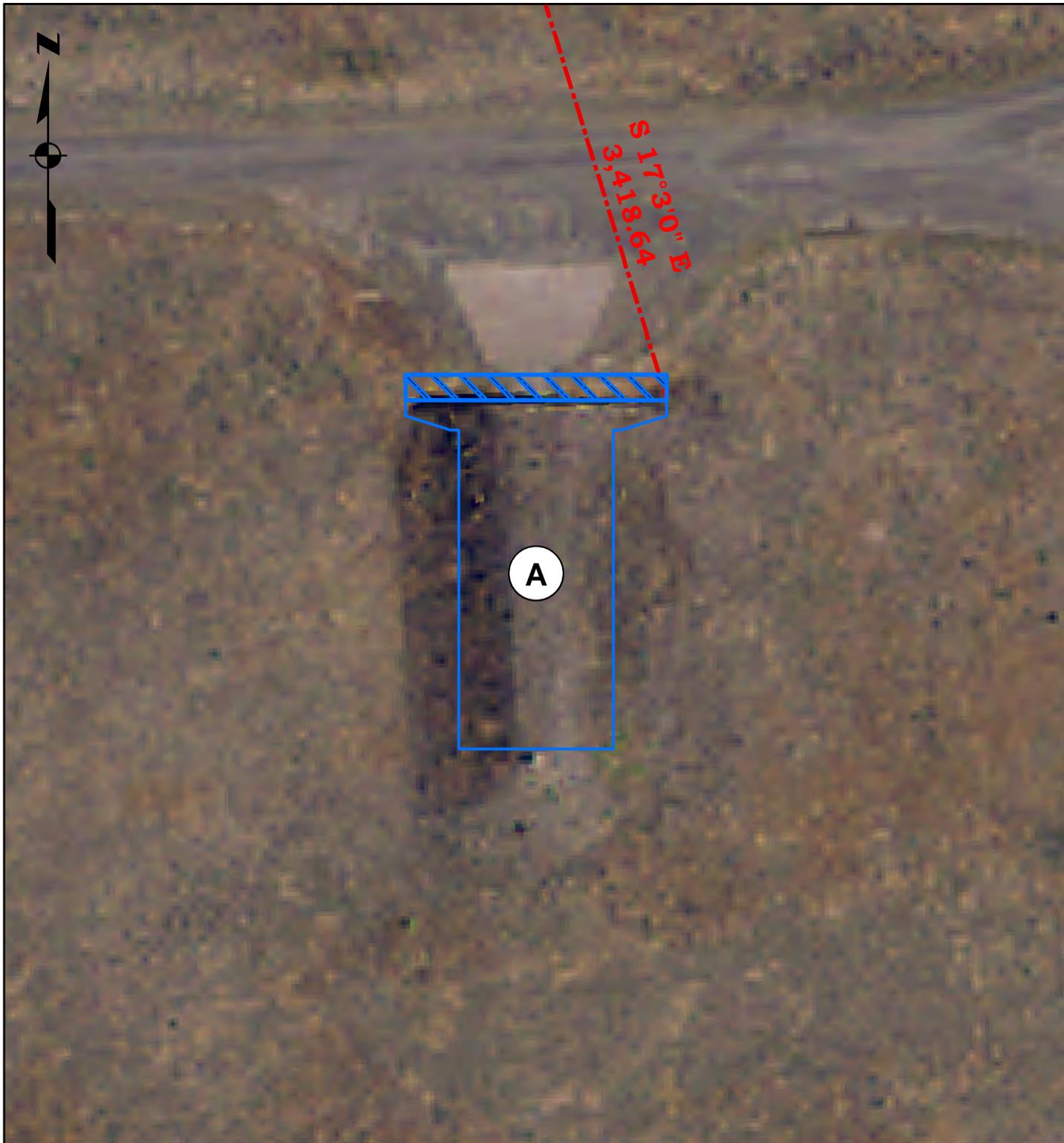
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1736



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1750

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 07°03'29" east, a distance of 2,858.47 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48'05" west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48'05" west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

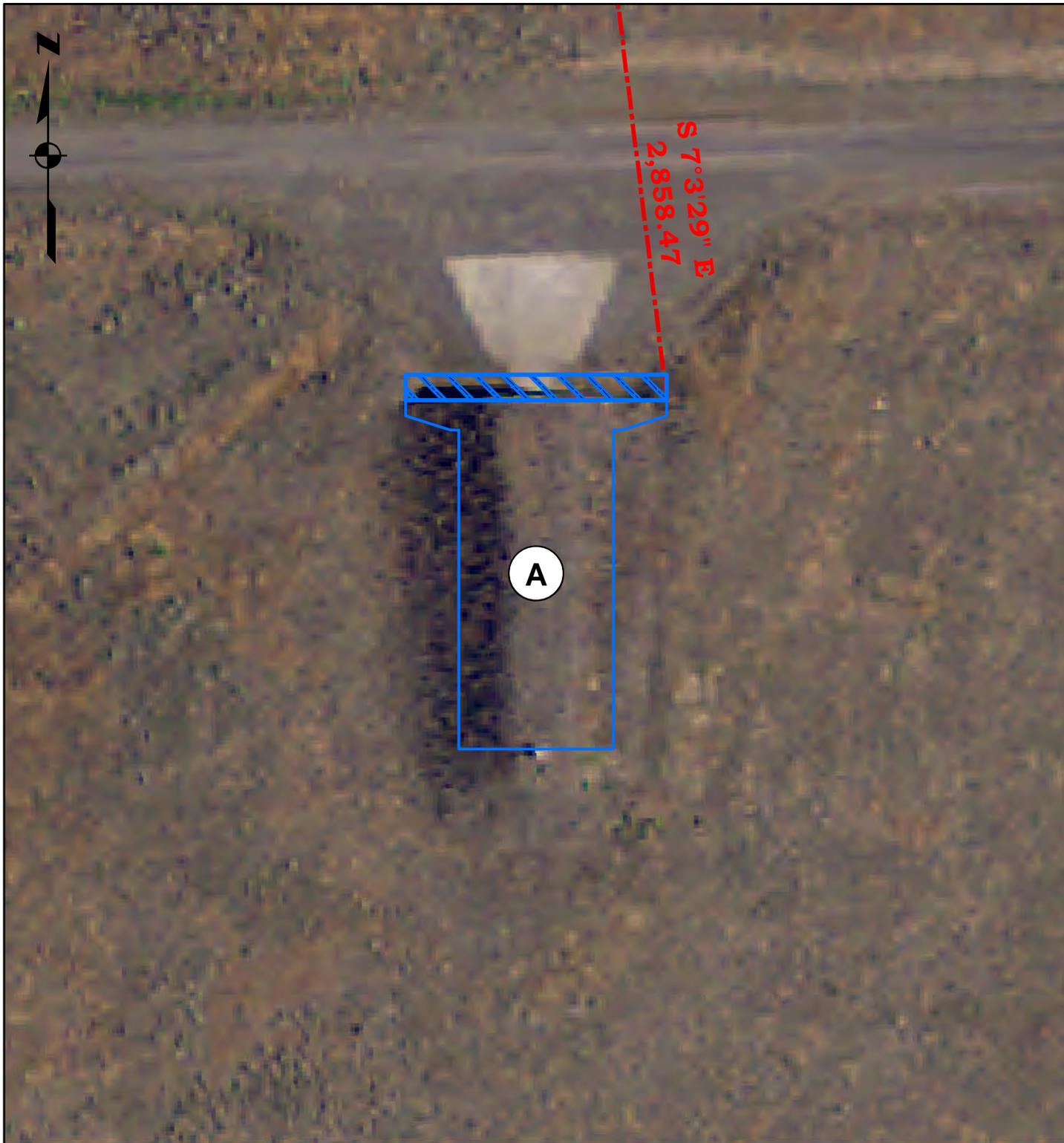
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1750



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any form whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1751

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 15°25’36” east, a distance of 2,935.56 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

- Thence north 00° east, a distance of 6.00 feet;
- Thence north 90° west, a distance of 61.50 feet;
- Thence south 00° west, a distance of 6.00 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

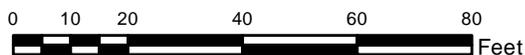
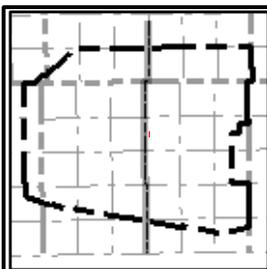
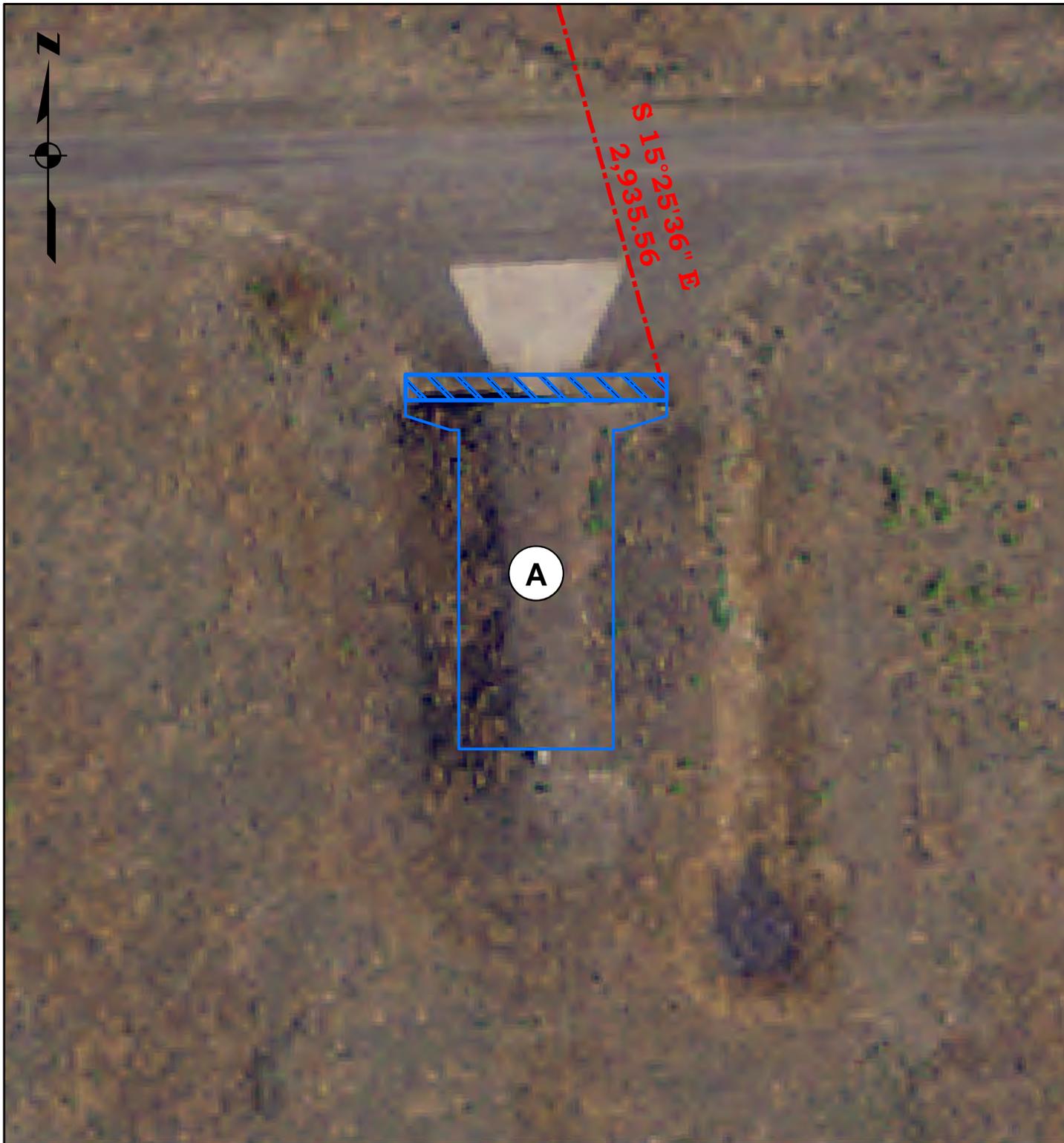
- BEGINNING** at point “A” as mentioned above;
- Thence south 00° west, a distance of 3.75 feet;
- Thence south 72°48’05” west, a distance of 10.991 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence south 00° west, a distance of 75.167 feet;
- Thence south 90° west, a distance of 36.50 feet;
- Thence north 00° east, a distance of 75.167 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence north 72°48’05” west, a distance of 10.991 feet;
- Thence north 00° east, a distance of 3.75 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1751



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1752

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 23°11'25" east, a distance of 3,072.97 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48'05" west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48'05" west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

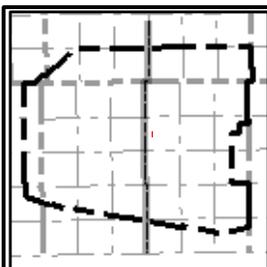
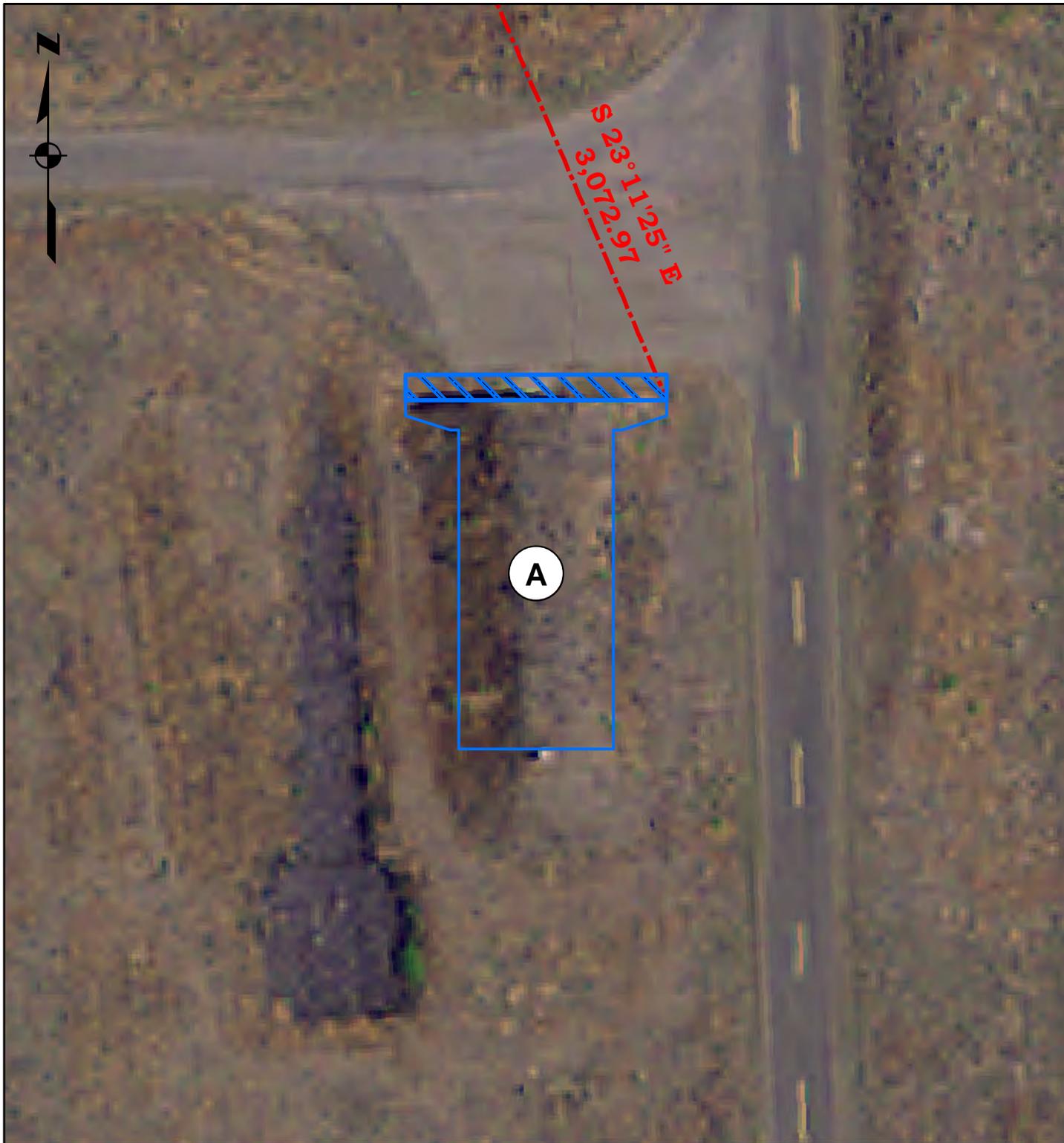
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1752



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, its should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any form whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1765

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 03°05’41” east, a distance of 2,402.45 feet, more or less, to point “A” and the **POINT OF BEGINNING;**

- Thence north 00° east, a distance of 6.00 feet;
- Thence north 90° west, a distance of 61.50 feet;
- Thence south 00° west, a distance of 6.00 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.;**

Containing 0.008 acres, more or less.

Building:

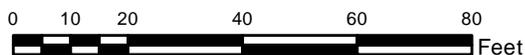
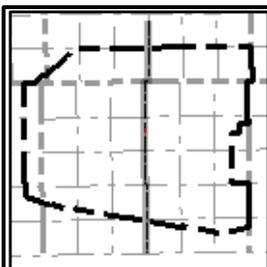
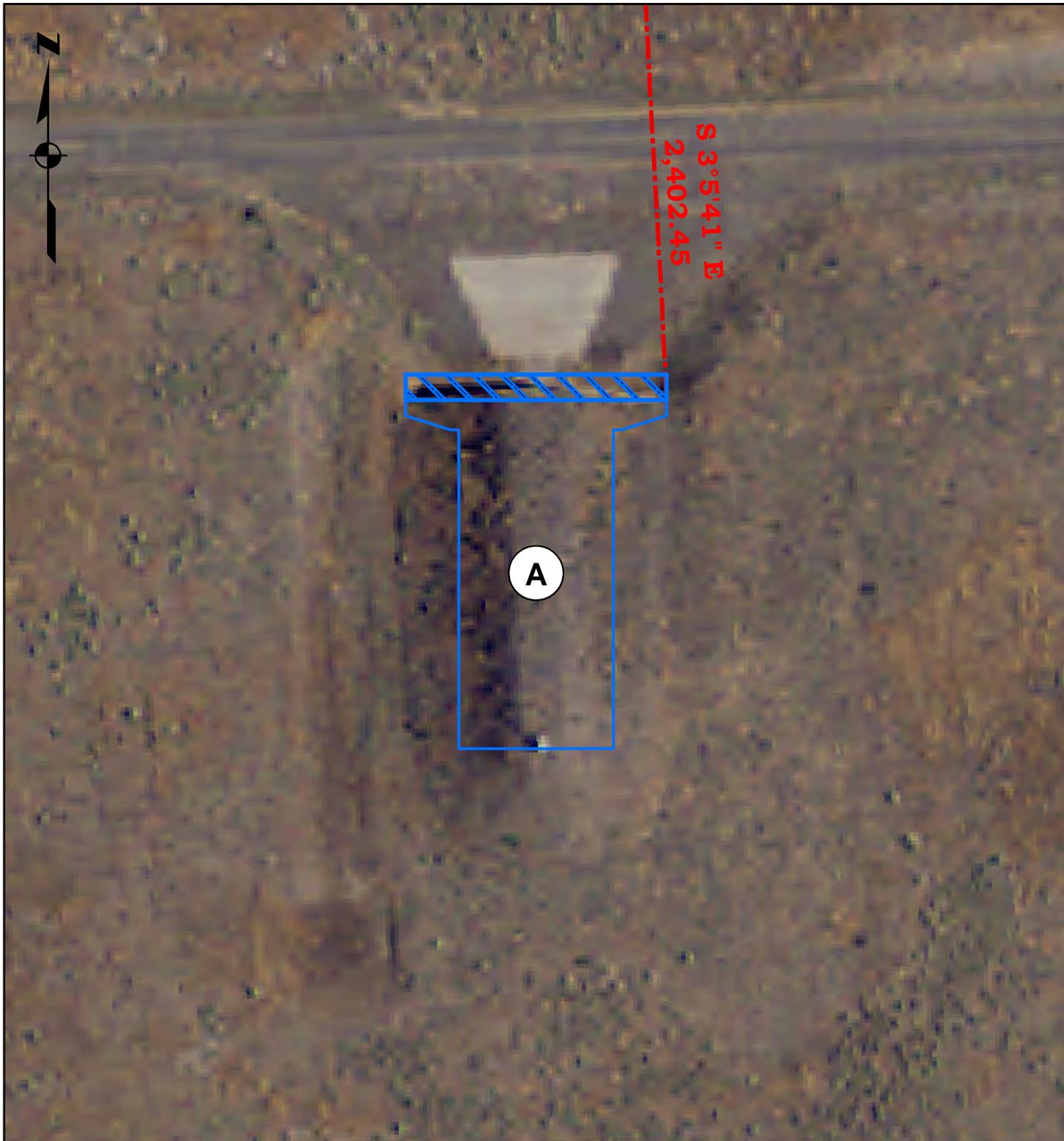
- BEGINNING** at point “A” as mentioned above;
- Thence south 00° west, a distance of 3.75 feet;
- Thence south 72°48’05” west, a distance of 10.991 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence south 00° west, a distance of 75.167 feet;
- Thence south 90° west, a distance of 36.50 feet;
- Thence north 00° east, a distance of 75.167 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence north 72°48’05” west, a distance of 10.991 feet;
- Thence north 00° east, a distance of 3.75 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1765



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1766

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 13°09’53” east, a distance of 2,458.47 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48’05” west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48’05” west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

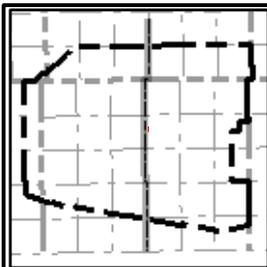
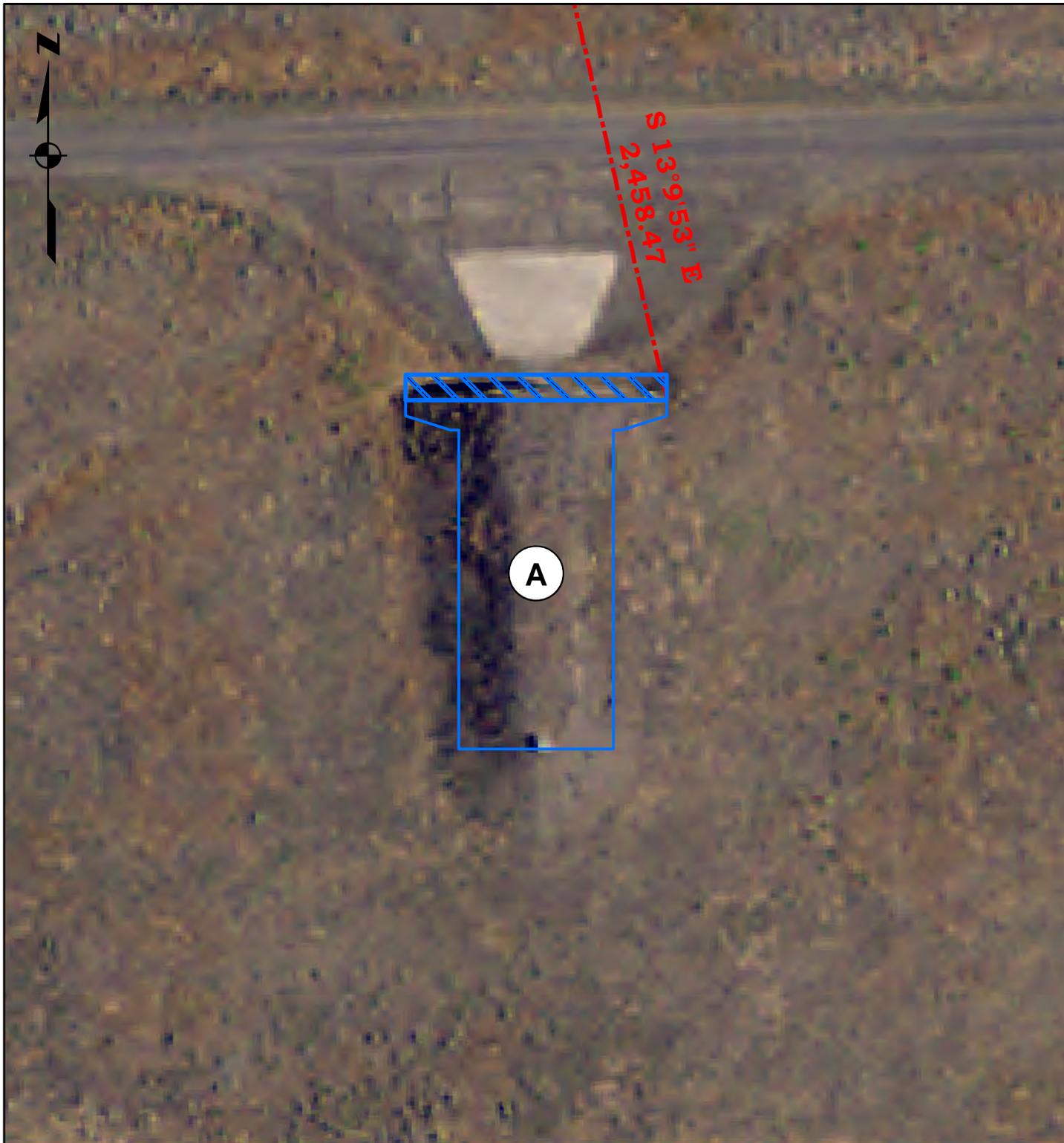
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1766



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1767

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 22°30’54” east, a distance of 2,584.88 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

- Thence north 00° east, a distance of 6.00 feet;
- Thence north 90° west, a distance of 61.50 feet;
- Thence south 00° west, a distance of 6.00 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

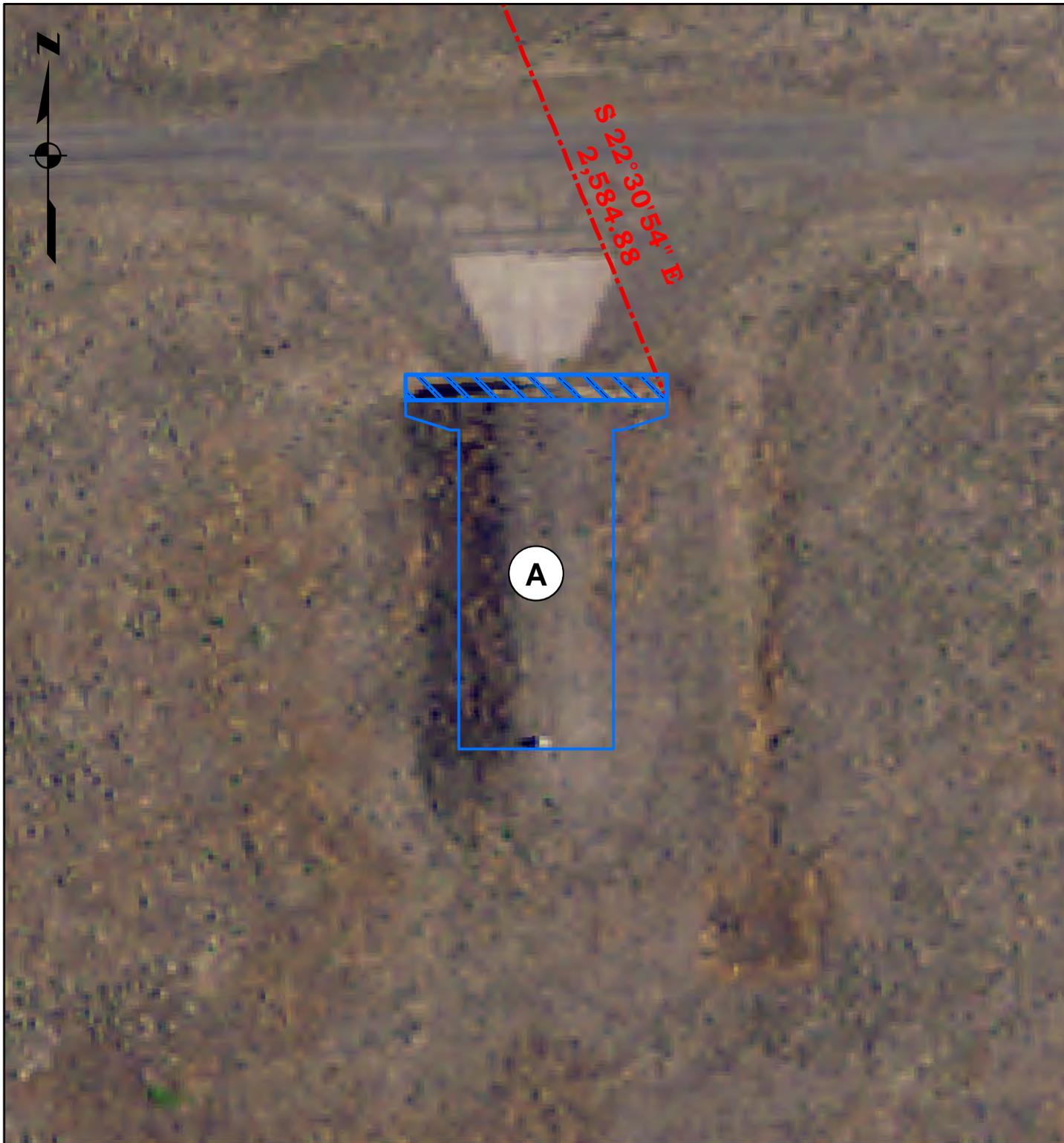
- BEGINNING** at point “A” as mentioned above;
- Thence south 00° west, a distance of 3.75 feet;
- Thence south 72°48’05” west, a distance of 10.991 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence south 00° west, a distance of 75.167 feet;
- Thence south 90° west, a distance of 36.50 feet;
- Thence north 00° east, a distance of 75.167 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence north 72°48’05” west, a distance of 10.991 feet;
- Thence north 00° east, a distance of 3.75 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1767



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1780

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 09°50’48” east, a distance of 1,984.42 feet, more or less, to point “A” and the **POINT F BEGINNING**;

- Thence north 00° east, a distance of 6.00 feet;
- Thence north 90° west, a distance of 61.50 feet;
- Thence south 00° west, a distance of 6.00 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**;

Containing 0.008 acres, more or less.

Building:

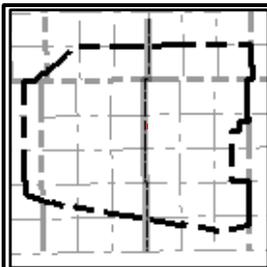
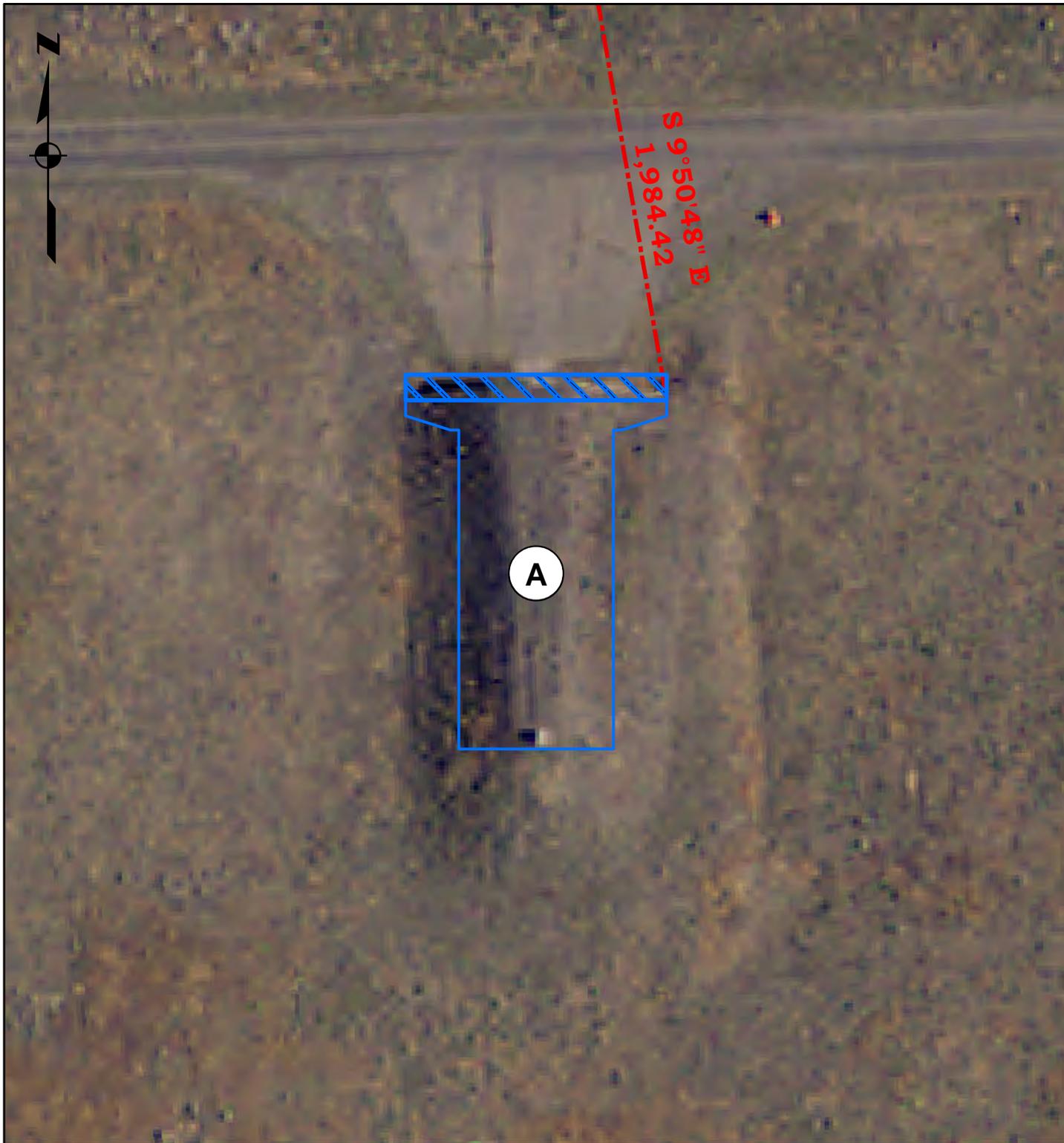
- BEGINNING** at point “A” as mentioned above;
- Thence south 00° west, a distance of 3.75 feet;
- Thence south 72°48’05” west, a distance of 10.991 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence south 00° west, a distance of 75.167 feet;
- Thence south 90° west, a distance of 36.50 feet;
- Thence north 00° east, a distance of 75.167 feet;
- Thence south 90° west, a distance of 2.00 feet;
- Thence north 72°48’05” west, a distance of 10.991 feet;
- Thence north 00° east, a distance of 3.75 feet;
- Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1780



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, its should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1781
"J" Block

Ptn. of Tr. A
0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 21°31'32" east, a distance of 2,095.23 feet, more or less, to point "A" and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;
Thence north 90° west, a distance of 61.50 feet;
Thence south 00° west, a distance of 6.00 feet;
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

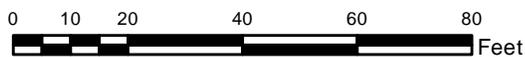
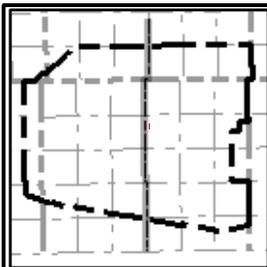
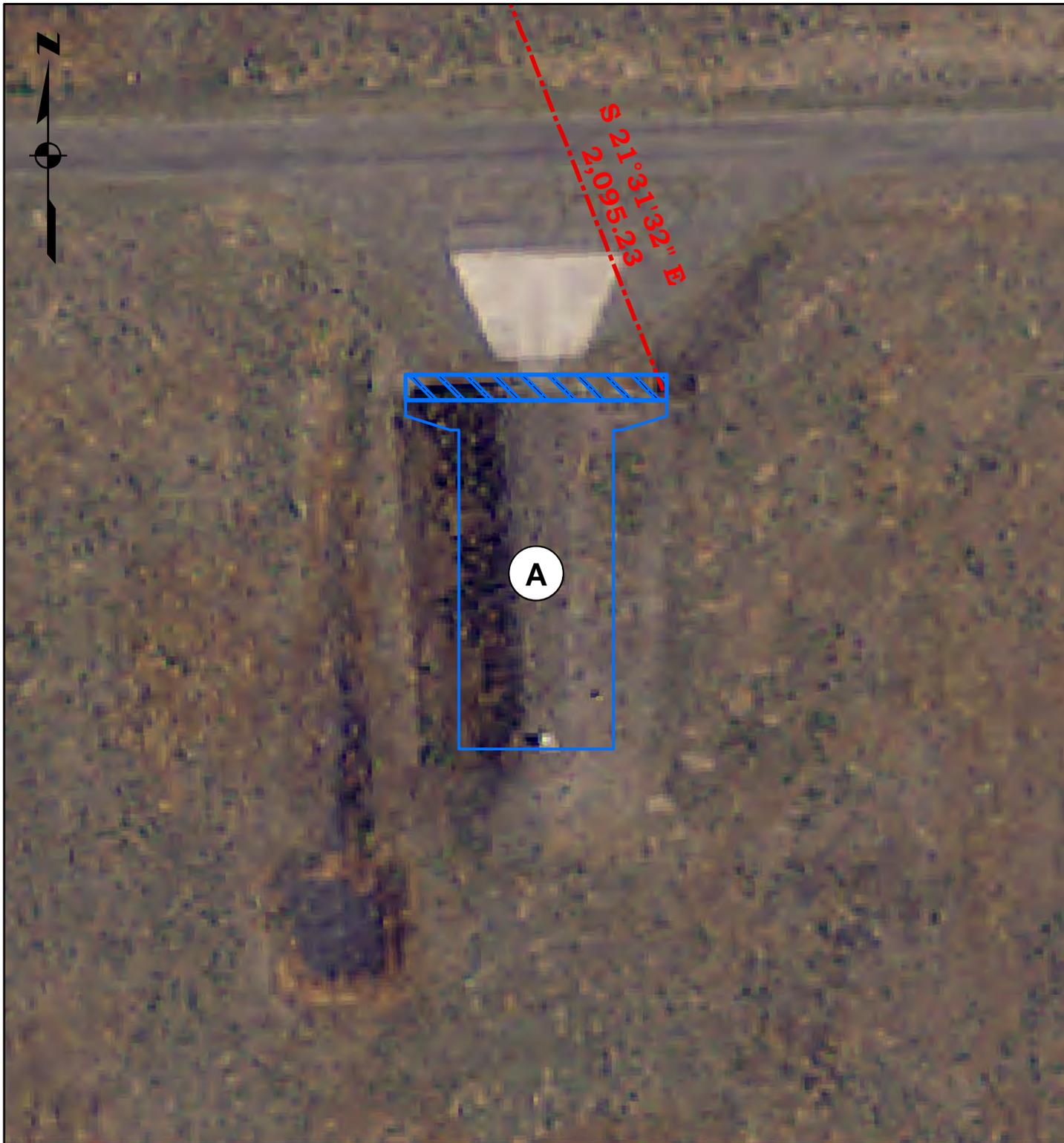
BEGINNING at point "A" as mentioned above;
Thence south 00° west, a distance of 3.75 feet;
Thence south 72°48'05" west, a distance of 10.991 feet;
Thence south 90° west, a distance of 2.00 feet;
Thence south 00° west, a distance of 75.167 feet;
Thence south 90° west, a distance of 36.50 feet;
Thence north 00° east, a distance of 75.167 feet;
Thence south 90° west, a distance of 2.00 feet;
Thence north 72°48'05" west, a distance of 10.991 feet;
Thence north 00° east, a distance of 3.75 feet;
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1781



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, its should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1782

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 31°40'44" east, a distance of 2,282.92 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48'05" west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48'05" west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

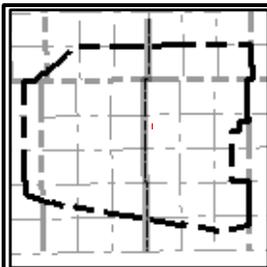
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING.**

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1782



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, its should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any form whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1808

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 16°52'26" east, a distance of 1,119.49 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48'05" west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48'05" west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

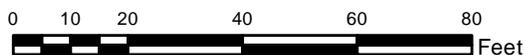
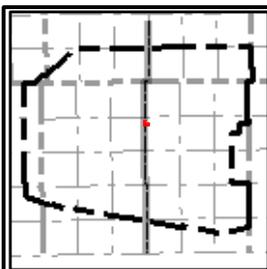
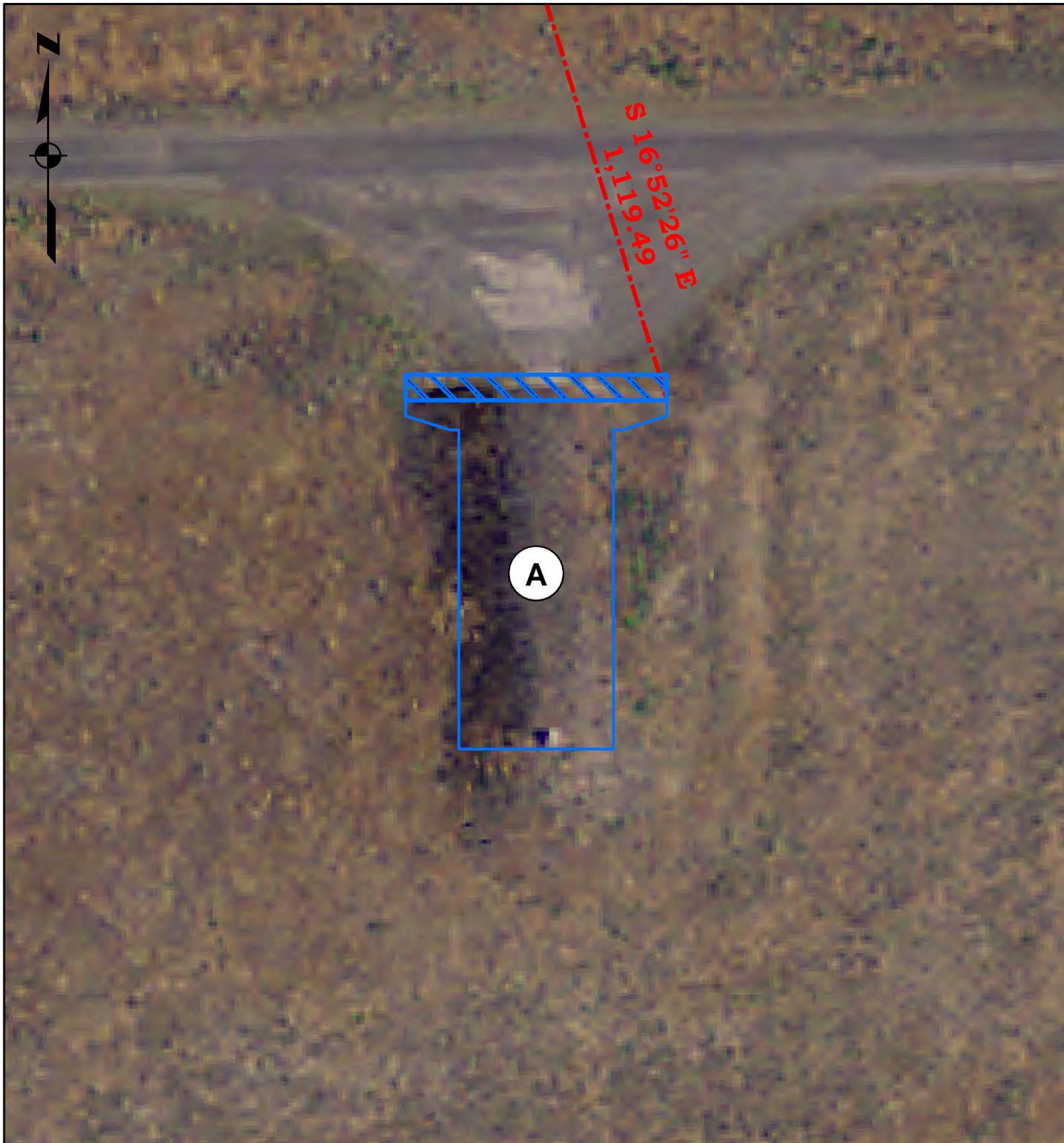
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1808



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, its should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1809

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 35°23'48" east, a distance of 1,305.47 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48'05" west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48'05" west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

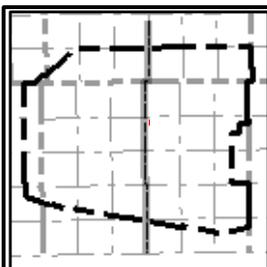
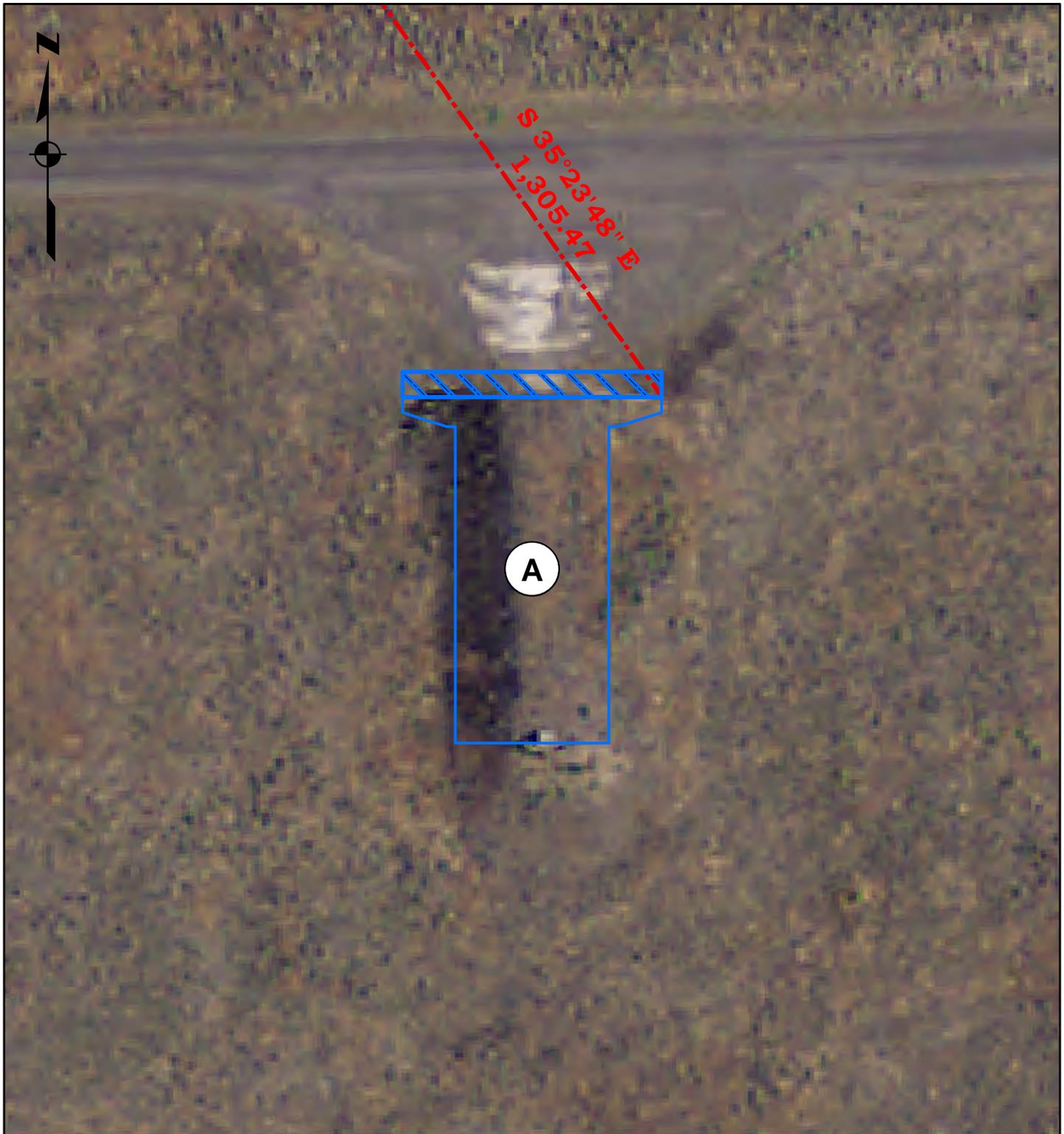
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1809



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot

Igloo Number 1810

“J” Block

Ptn. of Tr. A

0.008 Ac.

LEGAL DESCRIPTION

A parcel of land and a building situated on Tract A, in Section 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon described as follows:

Parcel:

COMMENCING at Camp Rees Monument No. 24 as delineated on Camp Rees License Boundary Survey, recorded 27 Aug 2014 in Umatilla County, thence south 48°15'13" east, a distance of 1,591.29 feet, more or less, to point “A” and the **POINT OF BEGINNING**;

Thence north 00° east, a distance of 6.00 feet;

Thence north 90° west, a distance of 61.50 feet;

Thence south 00° west, a distance of 6.00 feet;

Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**;

Containing 0.008 acres, more or less.

Building:

BEGINNING at point “A” as mentioned above;

Thence south 00° west, a distance of 3.75 feet;

Thence south 72°48'05" west, a distance of 10.991 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence south 00° west, a distance of 75.167 feet;

Thence south 90° west, a distance of 36.50 feet;

Thence north 00° east, a distance of 75.167 feet;

Thence south 90° west, a distance of 2.00 feet;

Thence north 72°48'05" west, a distance of 10.991 feet;

Thence north 00° east, a distance of 3.75 feet;

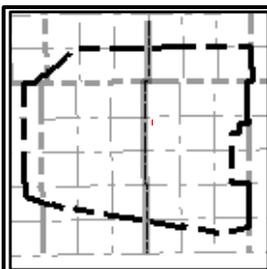
Thence north 90° east, a distance of 61.50 feet to the **POINT OF BEGINNING**.

Containing 3,139.958 square feet, more or less.

This Legal Description is not based on an actual survey and the presumption is that the northern most face of the building runs east to west.



Umatilla Chemical Depot J-Block Igloo No. 1810



Legend

- Igloos Footprint
- Igloo Front 6ft
- Bunker_COGO

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, its should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

LEGAL DESCRIPTION

A parcel of land lying in a portion Sections 2, 3 and 10, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon, more particularly described as follows:

Commencing at the northwest corner of Section 27, Township 4 North, Range 27 East, W.M., marked with a Umatilla County brass cap located at coordinate N 781948.21, E 8473748.49; thence N09°20'21"W a distance of 16,287.17 feet to "Mon. 1", and the true **Point of Beginning**;

Thence N00°01'32"E a distance of 379.97 feet to "Mon No. 20" as referenced in survey for Oregon Military Dept titled "Camp Rees License Boundary" by Ferguson Surveying;

Thence N00°42'18"W a distance of 1,496.92 feet to "Mon 2 AP";

Thence N89°23'12"E a distance of 83.84 ft. to "Mon 3 PC" and the start of a 1,593.70 ft radius curve to the right;

Thence along said 1,593.70 ft. radius curve right, 850.41 ft. (the long chord of which bears N75°19'35"W, 840.36 ft.) to "Mon 4 PT";

Thence S60°02'23"E a distance of 2,216.12 feet to "Mon 5 AP";

Thence S25°46'23"W a distance of 4,609.50 feet to "Mon 6 PC" and the start of a 637.85 ft radius curve to the left;

Thence along said 637.85 ft. radius curve left, 266.74 ft. (the long chord of which bears S16°35'25"W, 264.80 ft.) to "Mon 7 PRC" and the start of a 195.00 ft. radius curve to the right;

Thence along said 195.00 ft. radius curve right, 126.41 ft. (the long chord of which bears N23°14'58"E, 124.20 ft.) to "Mon 8 AP" and the start of a 322.50 ft. radius concave curve to the right;

Thence along said 322.50 ft. radius concave curve right, 175.81 ft. (the long chord of which bears S16°23'40"E, 173.64 ft.) to "Mon 9 PT"

Thence S89°13'23"W a distance of 60.00 feet to "Mon 10 PT" and the start of a 262.50 ft. concave curve to the left;

Thence along said 262.50 ft. radius curve left, 226.32 ft. (the long chord of which bears N25°28'37"W, 219.38 ft.) to "Mon 11 PRC" and the start of a 311.50 ft. radius curve to the right;

**UMATILLA CHEMICAL DEPOT
UMCDF BOUNDARY**

± 276.57 acs
Ptn. A & Ptn. 12

Thence along said 311.50 ft. radius curve right, 315.70 ft. (the long chord of which bears S21°08'34"E, 302.36 ft.) to "Mon 12 PC";

Thence N07°54'12"E a distance of 272.60 feet to "Mon 13 PT" and the start of a 1,076.85 ft. curve to the left;

Thence along said 1,076.85 ft. radius curve left, 871.02 ft. (the long chord of which bears S15°02'48"E, 847.47 ft.) to "Mon 14 PC";

Thence S38°13'25"E a distance of 1,010.84 feet to "Mon 15 PT" and the start of a 150.00 ft. curve to the left;

Thence along said 150.00 ft. radius curve left, 137.35 ft. (the long chord of which bears N64°27'23"W, 132.61 ft.) to "Mon 16 PC";

Thence S89°18'39"W a distance of 1,114.36 feet to "Mon 17 AP";

Thence N00°42'39"W a distance of 1,701.32 feet to "Mon 18";

Thence N89°15'56"W a distance of 1,608.23 feet to "Mon 1" and the true **Point of Beginning**.

The above described tract containing 276.57 Acres, more or less.

The above legal is based on an unrecorded survey by H & S Construction Site Surveyors dated 12 Nov 2013.

By: JEF 20 Aug 2014
Chkd: OJV 20 Aug 2014
Mod: JEF 27 Aug 2014 (Inverted Call)
Map: Industrial Area (Demil Plant).mxd
GIS: OrgProjects\Military\UMADA - UMATILLA\Tasks\H & S Survey
Doc: 002362.docx

Page 2 of 2

MAP 3 EXHIBIT C

**Legal Description and Survey
of Site UMAD-0034
Closed Active Landfill Operable Unit**

**UMATILLA CHEMICAL DEPOT
Landfill Restriction**

Ptn. of Trs. 14 & D-1
±17.49 Ac.

LEGAL DESCRIPTION

The preceding legal descriptions are based on a surveys done by Ferguson Survey & Engineering for the Oregon Military Department, titled "**Camp Rees License Boundary**". Filed in both Morrow County as Map of Survey #2014-1712C and in Umatilla County as Map of Survey #14-119-B, and a survey done for Columbia Development Authority, titled "**Umatilla Depot Survey**". Filed in both Morrow County as Map of Survey #2016-1752D and in Umatilla County as Map of Survey #16-018-C:

A tract of land situated in Sections 2 & 11 Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, Oregon, more particularly described as follows:

Commencing at the southeast corner of said section 2, as identified on said surveys, said point having a coordinate value of 797988.37 North, 8484118.85 East; thence south 88°55'37" west, a distance of 532.78 feet to the **Point of Beginning**;

Thence north 18°56'57" west, a distance of 719.89 feet;

Thence south 71°03'03" west, a distance of 1,000.00 feet;

Thence south 18°56'57" east, a distance of 642.03 feet;

Thence north 89°14'38" east, a distance of 505.97 feet;

Thence north 71°03'03" east, a distance of 519.33 feet;

Thence north 18°56'57" west, a distance of 80.11 feet to the **Point of Beginning**.

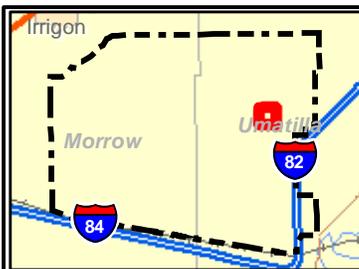
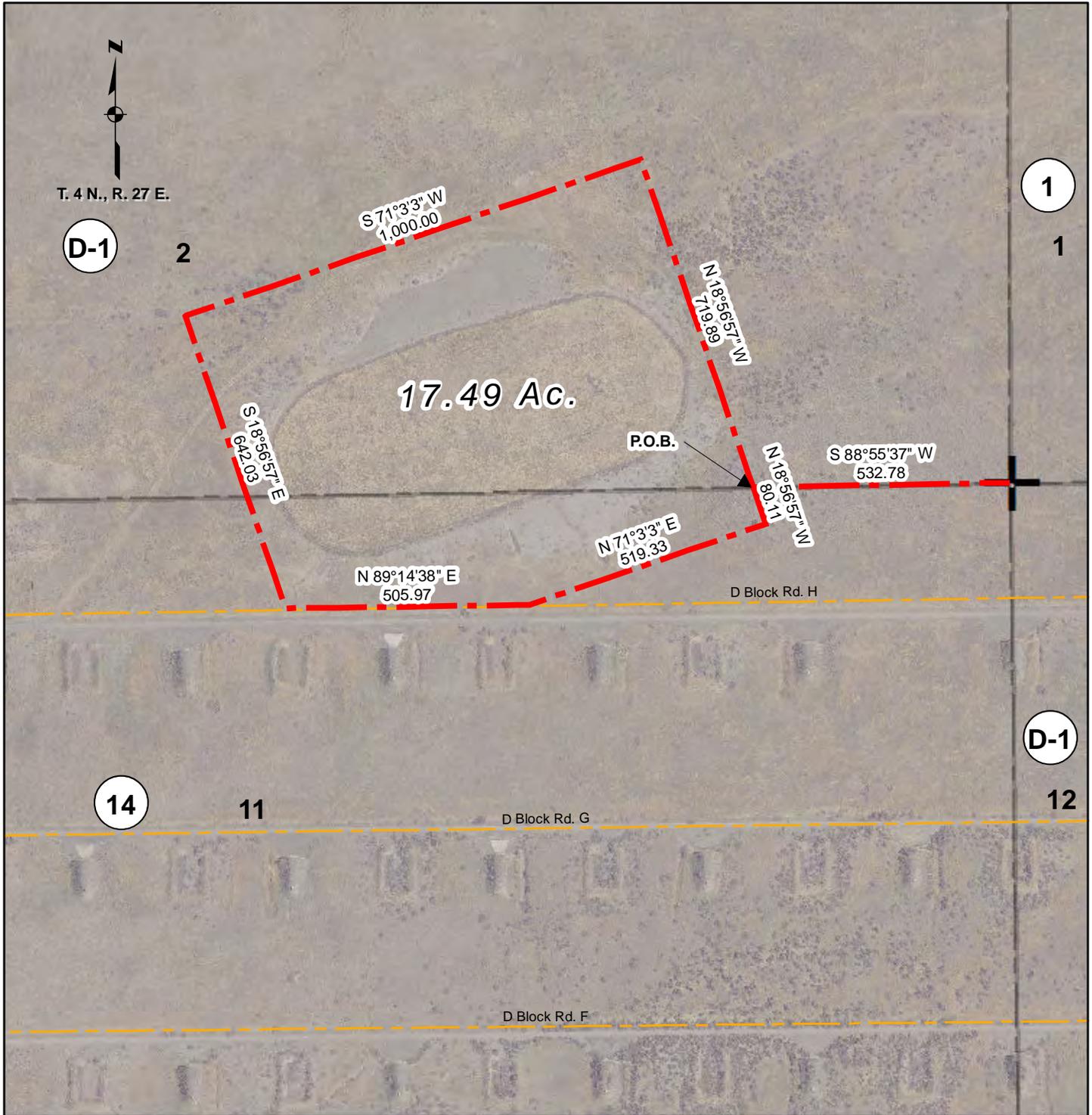
Contains 17.49 Acres, more or less.

By JEF 1 FEB 2017
Chkd: OJV 1 FEB 2017
Loc: \\UMADA - UMATILLA\\Tasks\\Site 39 & Landfill
Map: Landfill (NAD83).mxd
Doc: 002461.docx

(1)



UMATILLA CHEMICAL DEPOT LANDFILL SITE



Legend

- Section
- Qtr Section
- Township
- 16th
- Gov't Lots



DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees, or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

MAP 3 EXHIBIT D

**Legal Description and Survey
of Site UMAD-0039**

Quality Assurance Function Range Operable Unit

The preceding legal description is based on a unrecorded survey done by Tenneson Engineering Corp., titled "Grid Staking in site #39, Umatilla Army Chemical Depot".

LEGAL DESCRIPTION

A parcel of land in the southeast ¼ of section 34, the south ½ Section 35, and the southwest ¼ of section 36, Township 5 North, Range 27 East, Willamette Meridian, in Umatilla County, Oregon. Described as follows:

Beginning at the east quarter corner of said Section 34, Thence north 89°20'30" east a distance of 5,278.83 feet;
Thence north 89°17'01" east a distance of 2,626.26 feet;
Thence south 00°30'06" east a distance of 2,625.64 feet;
Thence south 89°17'51" west a distance of 2,615.53 feet;
Thence south 89°17'51" west a distance of 2,615.53 feet;
Thence south 89°21'01" west a distance of 2,648.71 feet;
Thence south 89°20'42" west a distance of 2,649.97 feet;
Thence north 01°04'00" west a distance of 2,629.24 feet;
Thence north 89°24'02" east a distance of 2,650.56 feet, to the **Point of Beginning**.

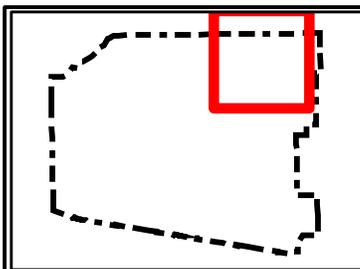
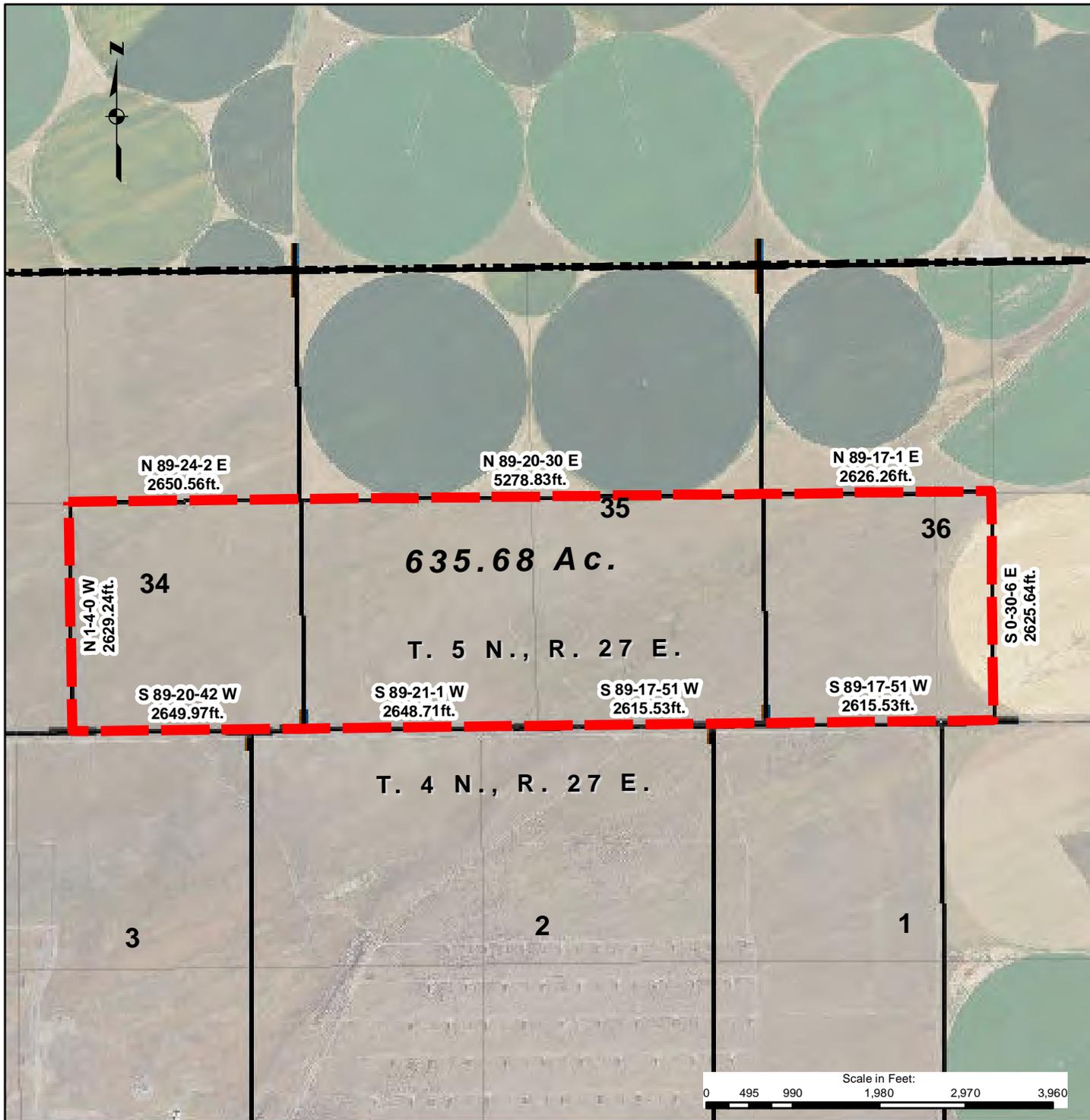
Containing a total of 635.68 acres, more or less.

Although information from Land Surveys may have been used in the creation of this document, in no way does this document represent or constitute a Land Survey.

By: OJV 20 Nov 2018
Checked: JEF 20 Nov 2018
MAP: \\UMADA - UMATILLA\Tasks\Site 39 & Landfill
DWG: Site 39-Full2.mxd
Doc: 002501.docx



UMATILLA CHEMICAL DEPOT SITE 39



Legend

- Site 39 Boundary
- Project_Boundary
- Section
- Qtr Section
- Township
- 16th
- Gov't Lots

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to as USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

Umatilla Chemical Depot
Site 39 - Land Use Controls

(±259 acres)

The preceding legal description is based on a unrecorded survey done by Tenneson Engineering Corp., titled "Grid Staking in site #39, Umatilla Army Chemical Depot":

LEGAL DESCRIPTION

A parcel of land in Township 5 North, Range 27 East, Willamette Meridian, in Umatilla County, Oregon. Described as follows:

The southeast quarter (SE¼) and the east 1,070 feet of the southwest quarter (SW¼) of Section 35.

Together with the west 600 feet of the southwest quarter (SW¼) of Section 36.

Containing a total 259 acres, more or less.

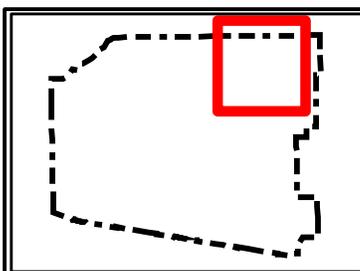
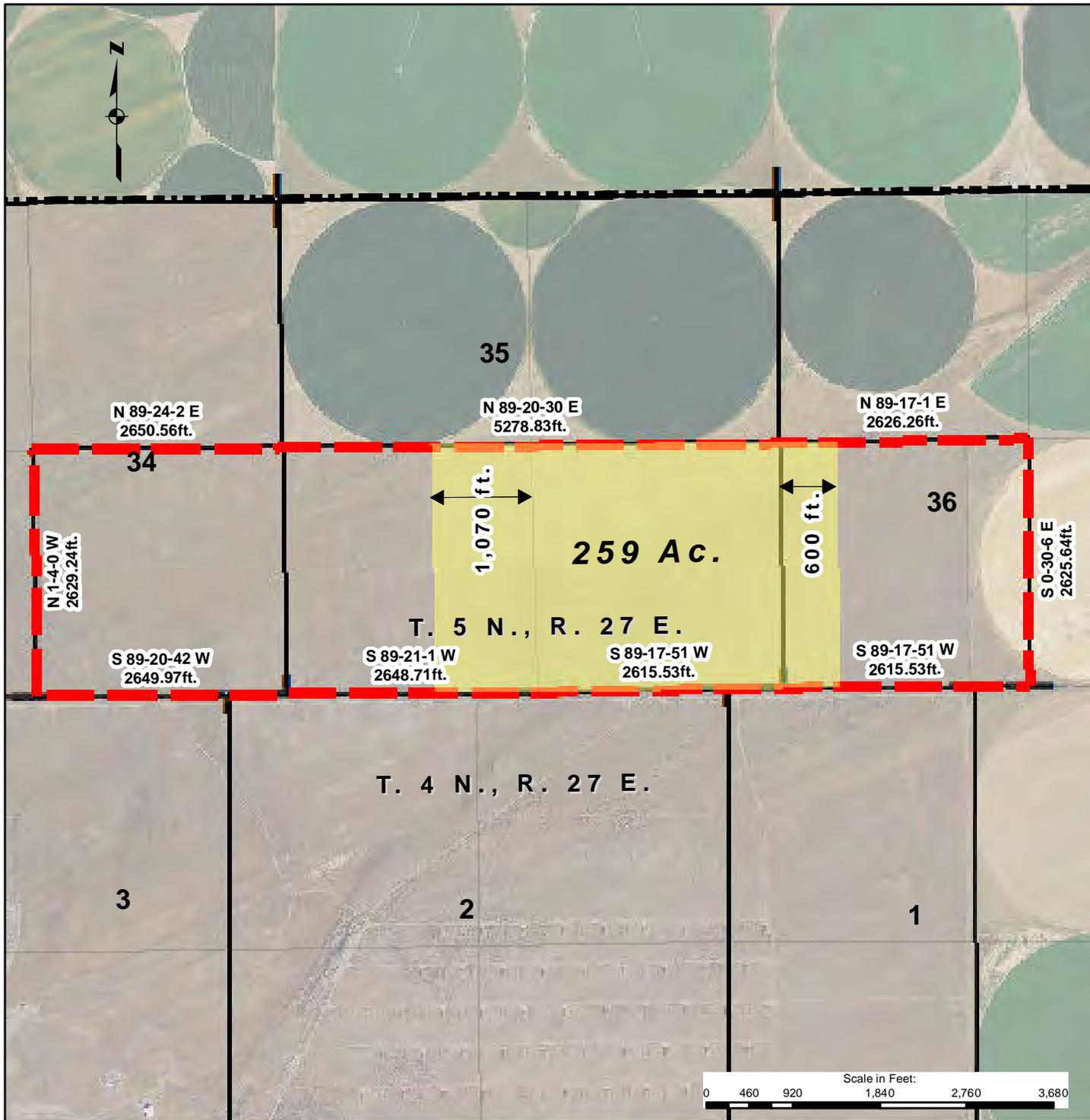
Although information from Land Surveys may have been used in the creation of this document, in no way does this document represent or constitute a Land Survey.

By: JEF 31 Jan 2017(Rev. OJV 11/20/2018)
Checked: OJV 31 Jan 2017(Rev. JEF 11/20/2018)
MAP: \\UMADA - UMATILLA\Tasks\Site 39 & Landfill
DWG: Land use controls2-Site39.mxd
Doc: 002458-rev-11-20-2018.docx

Page 1 of 1



UMATILLA CHEMICAL DEPOT SITE 39 LAND USE CONTROLS



Legend

- Site 39 LUC
- Site 39 Boundary
- Project_Boundary
- Section
- Qtr Section
- Township
- 16th
- Gov't Lots

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability of any nature for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

The preceding legal description is based on a unrecorded survey done by Tenneson Engineering Corp., titled "Grid Staking in site #39, Umatilla Army Chemical Depot":

LEGAL DESCRIPTION

A parcel of land in the southeast ¼ of Section 34, the south ½ Section 35, and the southwest ¼ of Section 36, Township 5 North, Range 27 East, Willamette Meridian, in Umatilla County, Oregon. Described as follows:

Beginning at the east quarter corner of said Section 34, Thence north 89°20'30" east a distance of 5,278.83 feet;
Thence north 89°17'01" east a distance of 2,626.26 feet;
Thence south 00°30'06" east a distance of 2,625.64 feet;
Thence south 89°17'51" west a distance of 2,615.53 feet;
Thence south 89°17'51" west a distance of 2,615.53 feet;
Thence south 89°21'01" west a distance of 2,648.71 feet;
Thence south 89°20'42" west a distance of 2,649.97 feet;
Thence north 01°04'00" west a distance of 2,629.24 feet;
Thence north 89°24'02" east a distance of 2,650.56 feet, to the **Point of Beginning**.

Excluding:

The southeast quarter (SE¼) and the east 1,070 feet of the southwest quarter (SW¼) of Section 35 and the west 600 feet of the southwest quarter (SW¼) of Section 36.

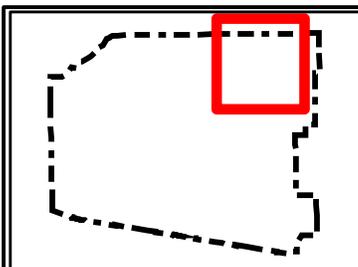
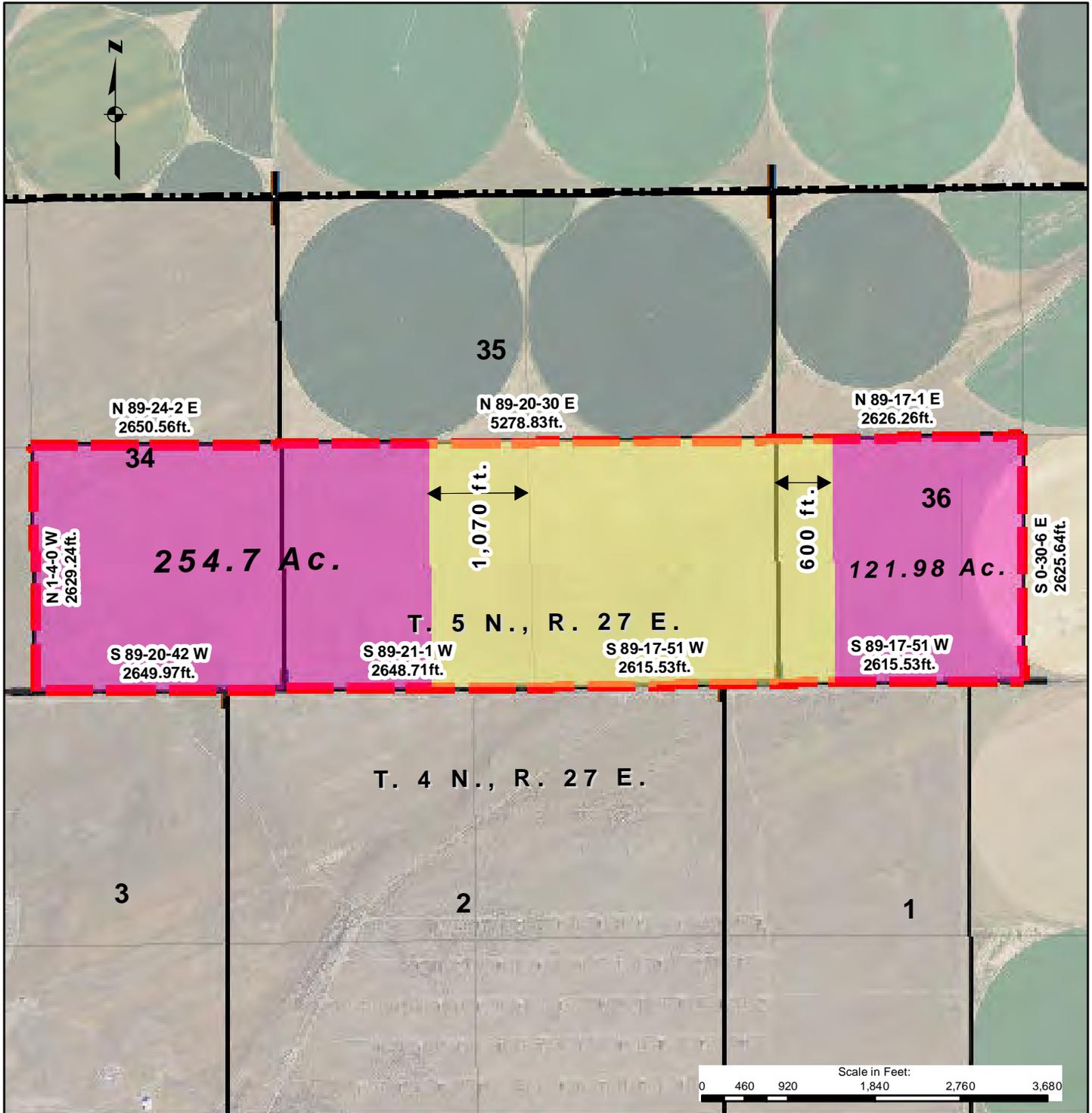
Containing a total of 376.68 acres, more or less.

Although information from Land Surveys may have been used in the creation of this document, in no way does this document represent or constitute a Land Survey.

By: OJV 20 Nov 2018
Checked: JEF 20 Nov 2018
MAP: \\UMADA - UMATILLA\Tasks\Site 39 & Landfill
DWG: Adj-LUC-Site39.mxd
Doc: 002502.docx



UMATILLA CHEMICAL DEPOT SITE 39 LAND ADJACENT TO LAND USE CONTROLS



Legend

- Site 39 Restriction: Agricultural and Limited Recreational Use
- Site 39 Notice: Area Adjacent to Former MEC Testing
- Site 39 Boundary
- Project_Boundary
- Section
- Qtr Section
- Township
- 16th
- Gov't Lots

DISCLAIMER - While the United States Army Corps of Engineers, (hereinafter referred to USACE) has made a reasonable effort to insure the accuracy of the maps and associated data, it should be explicitly noted that USACE makes no warranty, representation or guaranty, either express or implied, as to the content, sequence, accuracy, timeliness or completeness of any of the data provided herein. The USACE, its officers, agents, employees, or servants shall assume no liability for any errors, omissions, or inaccuracies in the information provided regardless of how caused. The USACE, its officers, agents, employees or servants shall assume no liability for any decisions made or actions taken or not taken by the user of the maps and associated data in reliance upon any information or data furnished here. By using these maps and associated data the user does so entirely at their own risk and explicitly acknowledges that he/she is aware of and agrees to be bound by this disclaimer and agrees not to present any claim or demand of any nature against the USACE, its officers, agents, employees or servants in any forum whatsoever for any damages of any nature whatsoever that may result from or may be caused in any way by the use of the maps and associated data.

MAP 3 EXHIBIT E

**Legal Description and Survey
of Site UMAD-0047
Deactivation Furnace Operable Unit**

LEGAL DESCRIPTION

The preceding legal description is based on a surveys done by Ferguson Survey & Engineering for the Oregon Military Department, titled **"Camp Rees License Boundary"**. Filed in both Morrow County as Map of Survey #2014-1712C and in Umatilla County as Map of Survey #14-119-B, and a survey done for Columbia Development Authority, titled **"Umatilla Depot Survey"**. Filed in both Morrow County as Map of Survey #2016-1752D and in Umatilla County as Map of Survey #16-018-C:

A tract of land situated in the NW ¼ of Section 19, Township 4 North, Range 27 East, Willamette Meridian, Morrow County, more particularly described as follows:

Commencing at the northwest section corner of said section 19, thence south 85°00'29" east, a distance of 426.74 feet to the **Point of Beginning**.

Thence north 86°50'07" east, a distance of 613.31 feet;
Thence south 03°09'53" east, a distance of 66.86 feet;
Thence north 86°50'07" east, a distance of 65.00 feet;
Thence south 03°09'53" east, a distance of 143.35 feet;
Thence south 86°50'07" west, a distance of 65.00 feet;
Thence south 03°09'53" east, a distance of 271.30 feet;
Thence south 86°50'07" west, a distance of 67.51 feet;
Thence south 03°09'53" east, a distance of 67.54 feet;
Thence south 86°50'07" west, a distance of 65.56 feet;
Thence south 03°09'53" east, a distance of 67.45 feet;
Thence south 86°50'07" west, a distance of 67.02 feet;
Thence south 03°09'53" east, a distance of 67.31 feet;
Thence south 86°50'07" west, a distance of 66.34 feet;
Thence south 03°09'53" east, a distance of 68.48 feet;
Thence south 86°50'07" west, a distance of 132.35 feet;
Thence south 03°09'53" east, a distance of 66.98 feet;
Thence south 86°50'07" west, a distance of 147.70 feet;
Thence south 03°09'53" east, a distance of 65.00 feet;
Thence south 86°50'07" west, a distance of 334.78 feet;
Thence north 03°09'53" west, a distance of 65.00 feet;
Thence south 86°50'07" west, a distance of 65.00 feet;
Thence north 03°09'53" west, a distance of 67.33 feet;
Thence south 86°50'07" west, a distance of 68.27 feet;
Thence north 03°09'53" west, a distance of 417.70 feet;
Thence north 86°50'07" east, a distance of 66.17 feet;
Thence north 03°09'53" west, a distance of 65.46 feet;
Thence north 86°50'07" east, a distance of 132.37 feet;
Thence north 03°09'53" west, a distance of 67.40 feet;

UMATILLA CHEMICAL DEPOT
Restrictive Use Area - Deactivation Furnace

Ptn. Tr. 16
15.97 Ac.

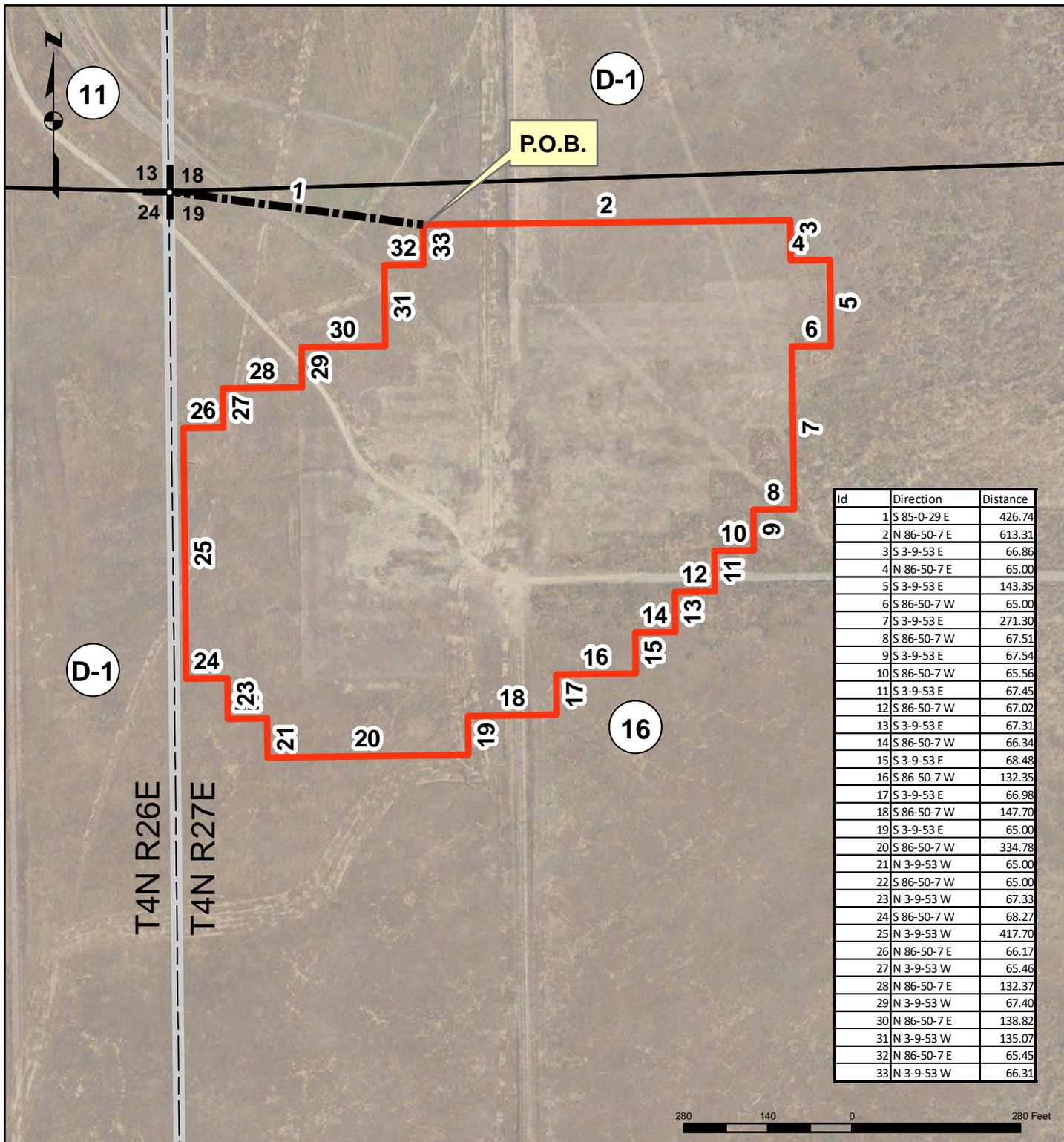
Thence north 86°50'07" east, a distance of 138.82 feet;
Thence north 03°09'53" west, a distance of 135.07 feet;
Thence north 86°50'07" east, a distance of 65.45 feet;
Thence north 03°09'53" west, a distance of 66.31 feet to the **Point of Beginning**.

Contains 15.97 Acres, more or less.

By: OJV 25 MAY 2018
Chkd: JEF 29 MAY 2018
Mod:
Loc: OrgProjects\Military\UMADA - UMATILLA\Tasks\ - Land use controls
- \Deactivation Furnace (2)
Map: LUC Deactivation Furnace.mxd
Doc: 002494.docx



UMATILLA CHEMICAL DEPOT LUC DEACTIVATION FURNACE



Id	Direction	Distance
1	S 85-0-29 E	426.74
2	N 86-50-7 E	613.31
3	S 3-9-53 E	66.86
4	N 86-50-7 E	65.00
5	S 3-9-53 E	143.35
6	S 86-50-7 W	65.00
7	S 3-9-53 E	271.30
8	S 86-50-7 W	67.51
9	S 3-9-53 E	67.54
10	S 86-50-7 W	65.56
11	S 3-9-53 E	67.45
12	S 86-50-7 W	67.02
13	S 3-9-53 E	67.31
14	S 86-50-7 W	66.34
15	S 3-9-53 E	68.48
16	S 86-50-7 W	132.35
17	S 3-9-53 E	66.98
18	S 86-50-7 W	147.70
19	S 3-9-53 E	65.00
20	S 86-50-7 W	334.78
21	N 3-9-53 W	65.00
22	S 86-50-7 W	65.00
23	N 3-9-53 W	67.33
24	S 86-50-7 W	68.27
25	N 3-9-53 W	417.70
26	N 86-50-7 E	66.17
27	N 3-9-53 W	65.46
28	N 86-50-7 E	132.37
29	N 3-9-53 W	67.40
30	N 86-50-7 E	138.82
31	N 3-9-53 W	135.07
32	N 86-50-7 E	65.45
33	N 3-9-53 W	66.31



Legend

- Section Tie
- Section
- LUC Deactivation Furnace
- Qtr Section
- Township
- 16th
- Gov't Lots

MAP 3 EXHIBIT F

**Legal Description and Survey
of Site UMAD-0024**

Explosives Washout Lagoon Groundwater Operable Unit

LEGAL DESCRIPTION

The preceding legal descriptions are based on a surveys done by Ferguson Survey & Engineering for the Oregon Military Department, titled **“Camp Rees License Boundary”**. Filed in both Morrow County as Map of Survey #2014-1712C and in Umatilla County as Map of Survey #14-119-B, and a survey done for Columbia Development Authority, titled **“Umatilla Depot Survey”**. Filed in both Morrow County as Map of Survey #2016-1752D and in Umatilla County as Map of Survey #16-018-C:

A tract of land situated in Sections 14 & 15, Township 4 North, Range 27 East, Willamette Meridian, Umatilla County, more particularly described as follows:

Beginning at “Camp Rees Monument #28”, as identified on said surveys, having a coordinate value of 790591.37 North, 8477153.19 East;

Thence S00°45’32.5”E, 3,033.303 ft. to “Camp Rees Monument #29”, and the beginning of a 600.00 ft. radius curve to the right;

Thence along said 600.00 ft. radius curve right, 471.831 ft. (the long chord of which bears S21°46’09.2”W, 459.767 ft.) to “Camp Rees Monument #30”;

Thence S44°17’50.9”W, 1,489.323 ft. to “Camp Rees Monument #31”, and the beginning of a 500.00 ft. radius curve to the left;

Thence along said 500.00 ft. radius curve left, 150.33 ft. (the long chord of which bears S35°41’04”W, 149.76 ft.);

Thence north 88°56’54” east, a distance of 435.64 feet;

Thence north 89°19’17” east, a distance of 2,657.36 feet;

Thence north 01°29’30” west, a distance of 1,331.48 feet;

Thence north 89°48’19” east, a distance of 1,341.61 feet;

Thence north 01°26’48” west, a distance of 1,339.08 feet;

Thence north 89°07’43” east, a distance of 1,325.02 feet;

Thence north 00°44’20” west, a distance of 2,646.34 feet;

Thence south 89°03’13” west, a distance of 2,648.31 feet;

Thence south 89°04’42” west, a distance of 1,819.60 feet;

Thence south 00°44’18” east, a distance of 660.18 feet to “Camp Rees Monument #27”

Thence north 89°16’47” east, a distance of 60.00 feet to “Camp Rees Monument #28” and the **Point of Beginning**.

Contains 437.34 Acres, more or less.

By JEF 18 MAR 2016

Chkd: OJV 18 MAR 2016

Mod: JEF 10 Mar 2017 (Replaced with entirely new area)

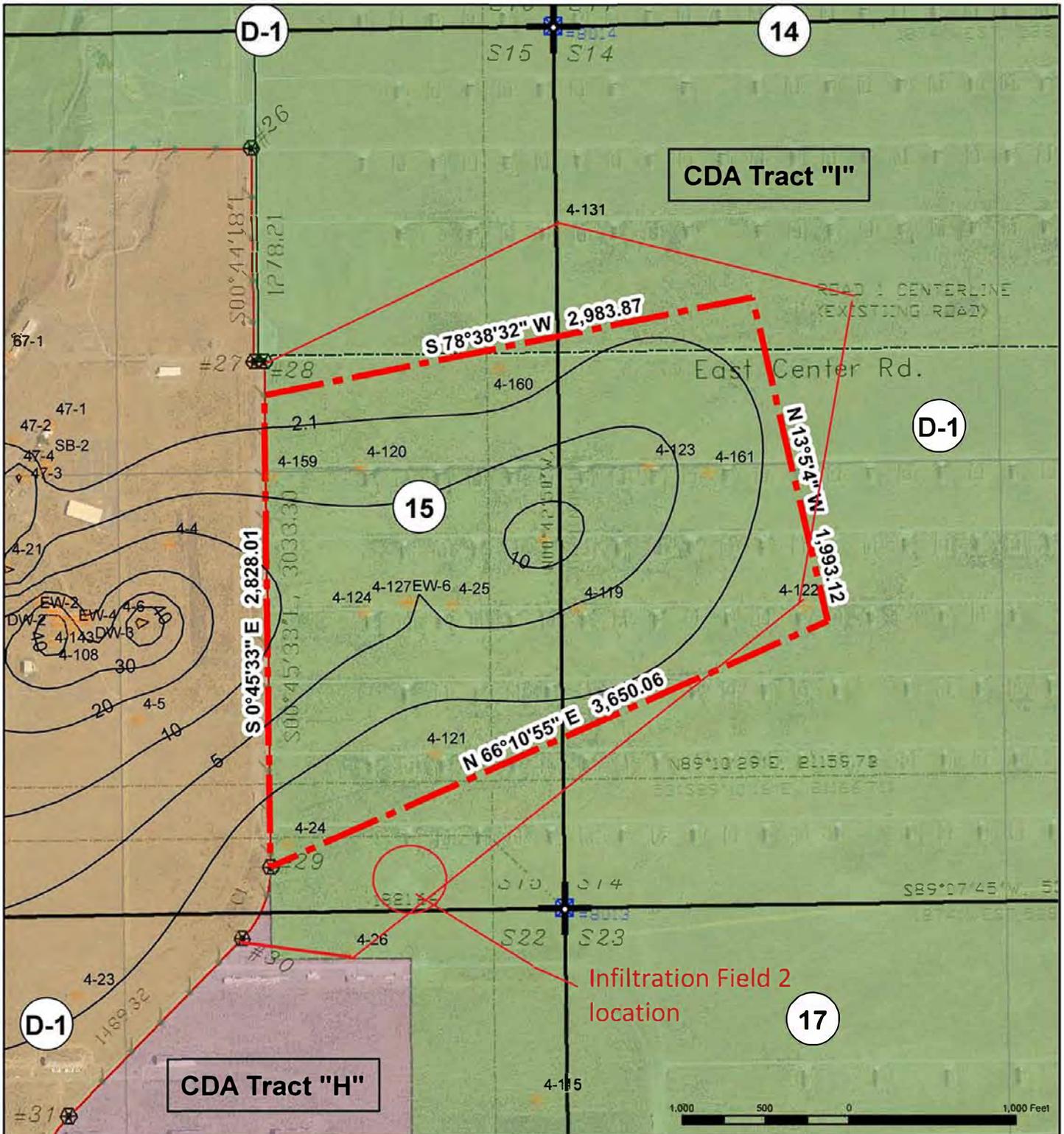
Loc: OrgProjects\Military\UMADA - UMATILLA\Tasks\Groundplume

Map: UCD - Groundwater Restriction Area CDA.mxd

Doc: 002405.docx



Groundwater Plume, Wells, and Infiltration Gallery

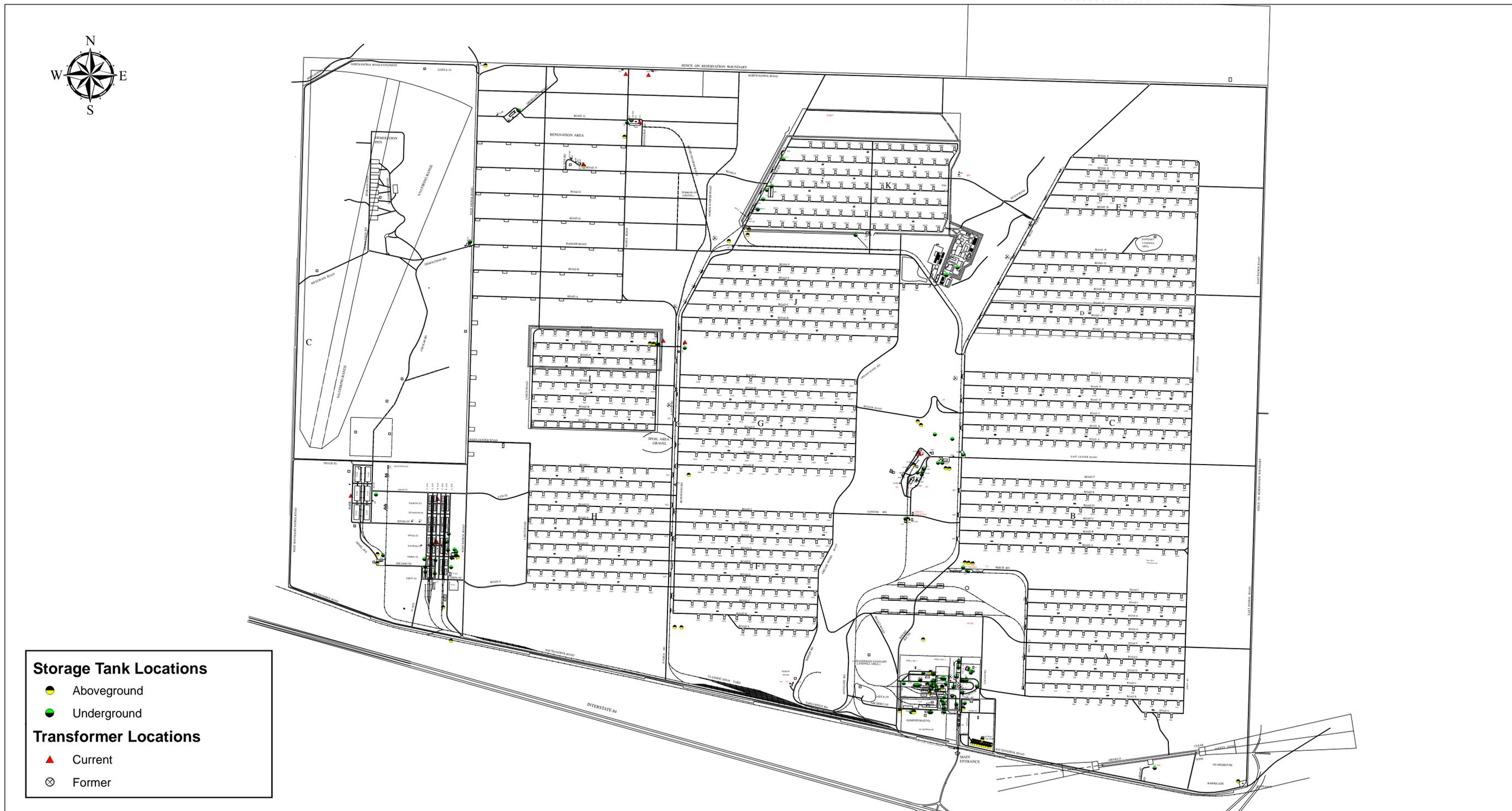


Legend

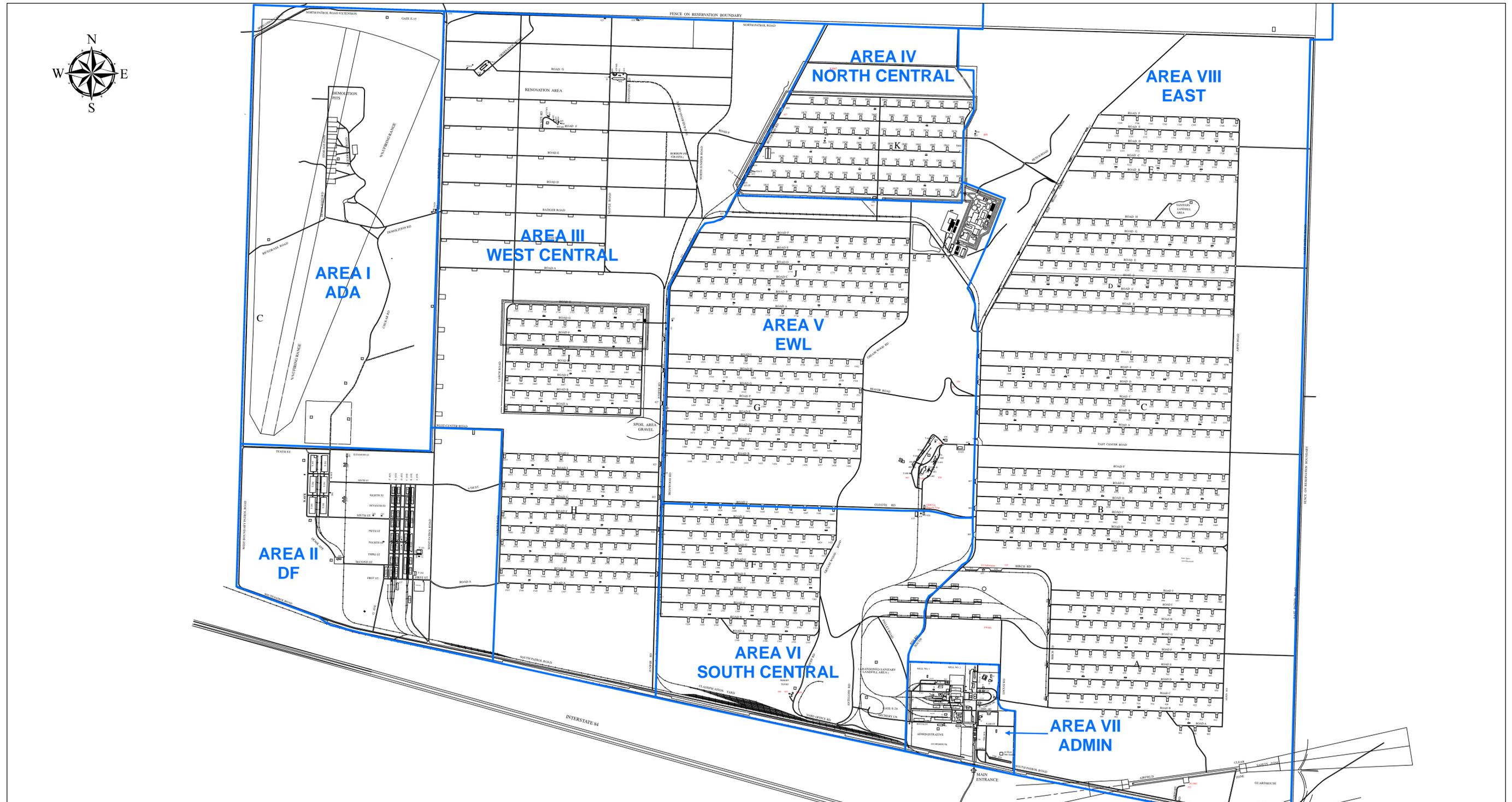
- UMCD Well Locations
- Groundwater Contours
- dod_rpi_land_parcel_area



Map 4: Historic UST and AST Locations



Map 5: Installation Building Map with Numbered Study Sections



UMATILLA CHEMICAL DEPOT Umatilla, Oregon		Installation Building Map with Numbered Study Sections (I through VIII)	
FIGURE 2	LAST REVISION: 4/30/2010	MAP AUTHOR: SCJ	DEPT: Geospatial

Enclosure 2

ENVIRONMENTAL DOCUMENTATION

AGI Technologies, 2000. *Underground Storage Tank Removal, Umatilla Army Chemical Depot, Hermiston, Oregon*. Prepared for Pacific Environmental Services. Feb. 2000.

Army Regulation (AR) 200-1, 2007. *Environmental Protection and Enhancement*. Dec. 2007.

ASTM, 2002. Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities. D5746-98. 2002.

ASTM, 2005. Standard Practice for Conducting Environmental Baseline Surveys. D6008-96. 2005.

Battelle, Pacific Northwest Laboratories, 1982. *Environmental Contamination Survey and Assessment of Umatilla Army Depot Activity (UMADA), Final Report*. Prepared for Umatilla Army Depot Activity, Hermiston, Oregon, and U.S. Army Toxic and Hazardous Materials Agency, Aberdeen Proving Ground, MD. Apr. 1982.

Bay West, Inc. and USA Environmental, Inc., 2009. After Action Report, Planned Final Remedial Action, Site 39, Quality Assurance Function Range, Umatilla Chemical Depot, Hermiston, Oregon. Prepared for the U.S. Army Corps of Engineers. Aug. 2009.

Bowling, Curtis M., 2011. "DDESB Approval of NDAI." Memorandum. Mar. 2011. Brown, W., 1991. Final Environmental Impact Statement, Base Realignment and Closure, Umatilla Depot Activity. 1991.

Dames and Moore, 1990. *Enhanced Preliminary Assessment for Umatilla Depot Activity*. Volume 1-2. Prepared for the U.S. Army Toxic and Hazardous Material Agency, Aberdeen Proving Ground, MD. Apr. 1990.

Dames and Moore, 1992a. *Final Asbestos Assessment Survey, Umatilla Depot Activity, Hermiston, Oregon*. Volumes 1-4. Prepared for the U.S. Army Toxic and Hazardous Materials Agency, Aberdeen Proving Ground, Aberdeen, MD. Aug. 1992.

Dames and Moore, 1992b. *Final Remedial Investigation Report for the Umatilla Depot Activity*. Prepared for the US Army Corps of Engineers. Aug. 1992.

Dames and Moore, 1993a. *Final Human Health Baseline Risk Assessment*. Prepared for the U.S. Army Corps of Engineers. Aug. 1993.

Dames and Moore, 1993b. *Final Report, Radon Screening of Buildings at the Umatilla Depot Activity, Hermiston, Oregon*. Prepared for U. S. Army Environmental Center Command, Aberdeen Proving Ground, Aberdeen, MD. 1993.

Dames and Moore, 1993c. *Supplementary Remedial Investigation Report for the Umatilla Depot Activity, Hermiston Oregon*. Prepared for the U.S. Army Environmental Center Command, Aberdeen Proving Ground, MD, Contract DAAA15-90-D-0015, Delivery Order No. 10. Sept. 1993.

Dames and Moore, 1995. *Underground Storage Tank Investigation Report Umatilla Depot Activity, Hermiston, Oregon*. Prepared for U.S. Army Environmental Center Command, Aberdeen Proving

Ground, MD, Contract DAAA15-90-D-0015, Delivery Order No. 10. Jun. 1995.

Dames and Moore, 2000. *Final Site Closure Report, Petroleum-contaminated Soil Investigation and Removal, Umatilla Chemical Depot, Hermiston Oregon*. Prepared for Umatilla Chemical Depot, Contract DAAA15-90-D-0015, Delivery Order No. 10. Mar. 2000.

Daugherty, Mark E., 1991. "Diesel Fuel Spill." Memorandum. Mar. 1991.

Defense Environmental Restoration Board, 2005. Final Record of Decision. Umatilla Chemical Depot, Site 39 (Quality Assurance Function Range). May 2005.

Defense Environmental Restoration Program (DERP), 1993. Final Record of Decision. Umatilla Depot Activity, Inactive Landfills Operable Unit. Revision 1. Mar. 1993.

DERP, 1994a. Decision Document: Supplementary Remedial Investigation Study Sites and Polychlorinated Biphenyl Transformer Location, Umatilla Depot Activity, Hermiston, Oregon. Jul. 1994.

DERP, 1994b. Final Record of Decision: Umatilla Depot Activity, Ammunition Demolition Activity Area Operable Unit. Jun. 1994.

DERP, 1994c. Final Record of Decision: Umatilla Depot Activity Miscellaneous Sites Operable Unit. Jun. 1994.

Department of Defense (DOD) 4165.66-M, 2006. Section C8.3. *Base Redevelopment and Realignment Manual*. 4165.66-M, 2006. Section C8.3. Mar. 2006.

Earth Technology Corporation, 1994. *Community Environmental Response Facilitation Act (CERFA) Report*. Prepared for the U.S. Army Environmental Center Command. Apr. 1994.

Earth Technology Corporation, 1995. *Base Realignment and Closure (BRAC) Cleanup Plan, Umatilla Depot Activity, Hermiston, Oregon*. Prepared for the U.S. Army Environmental Center Command, Aberdeen Proving Ground, MD. Jan. 1995.

Earth Technology Corporation, 1998. *Engineering Sampling Analysis, Umatilla Chemical Depot, Ammunition Demolition Activity Area, Hermiston, Oregon*. Prepared for the U.S. Army Corps of Engineers, US Army Engineering and Support Center, Huntsville AL and the U.S. Army Corps of Engineers, Seattle District, Contract No. DACA87-95-D-0017, Task Order No. 8. Apr. 1998.

EMR Incorporated, 2009. Evaluation of Performance Benefits of Pulse Pumping, Umatilla Chemical Depot Explosives Washout Lagoons Pump and Treat System, Hermiston, Oregon. Prepared for the U.S. Army Corps of Engineers, Seattle District. Oct. 2009.

Engineering-Environmental Management, Inc., 2003. *Final U.S. Army Closed, Transferring, and Transferred Range/Site Inventory for the Umatilla Chemical Depot*. Prepared for the U.S. Army Environmental Center Command and the U.S. Army Corps of Engineers, Omaha District. Jun. 2003.

Foss Environmental Services, 1995a. *Removal of Thirteen Underground Storage Tanks at Umatilla Army Depot, Hermiston Oregon*. Prepared for U.S. Army Corps of Engineers, Seattle District. Dec 1995.

Foss Environmental Services, 1995b. Removal of UST 20, 10,000 Gallon Underground Heating Oil Storage Tank at Building 37, Umatilla Military Depot Activity, Hermiston, Oregon. Prepared for the U.S. Army Corps of Engineers, Seattle District. Feb. 1995.

Foss Environmental Services, 1995c. Removal of UST 88, 1000 Gallon Underground Diesel Fuel Storage Tank at Deactivation Furnace Site, Umatilla Military Depot Activity, Hermiston, Oregon. Prepared for U.S. Army Corps of Engineers, Seattle District. Feb. 1995.

Foss Environmental Services, 1995d. Report on the Discovery and Remediation of Petroleum Contaminated Soils Associated with Underground Storage Tanks at Umatilla Army Depot Activity, Hermiston, Oregon. Prepared for Oregon Department of Environmental Quality, Eastern Region. Dec. 1995.

Hart Crowser, 1996. *Lead-Based Paint Survey, Umatilla Army Depot Activity, Umatilla, Oregon.* Prepared for U.S. Army Corps of Engineers, Seattle District. Dec. 1996.

Little, Arthur, D., 1993a. *Final Feasibility Study for the Explosives Washout Plant.* Prepared for the U.S. Army Environmental Center Command, Aberdeen Proving Ground, MD. 1993.

Little, Arthur, D., 1993b. *Final Feasibility Study for the Miscellaneous Sites (OU5) at the Umatilla Depot Activity (UMDA).* Prepared for the U.S. Army Environmental Center Command, Aberdeen Proving Ground, MD. Nov. 1993.

Little, Arthur, D., 1993c. "Spill Report #93-283, clean up report of Heating Oil #5." Memorandum. In *Revised Draft Final Feasibility Study for Ammunition Demolition Area (OU4).* Prepared for the U.S. Army Environmental Center Command, Aberdeen Proving Ground, Maryland, September 22, 1993. McDune, William D. Mar. 1993.

Little, Arthur, D., 1993d. *Final Feasibility Study for the Explosives Washout Lagoons Activity Area (OU3) at the Umatilla Depot Activity (UMDA).* Prepared for the U.S. Army Environmental Center Command, Aberdeen Proving Ground, MD. December 1993.

NUS Corporation, 1987. *Final Interim RCRA Facility Assessment, Umatilla Army Depot Activity, Hermiston, Oregon.* Prepared for US Environmental Protection Agency, Office of Solid Waste, Washington, DC, Contract No. 68-01-7310. Jun. 1987.

Oregon Department of Environmental Quality (ODEQ), 1997a. *National Pollutant Discharge Elimination System Waste Discharge Permit.* Permittee U.S. Army Chemical Depot, Hermiston OR 97838. 1997.

ODEQ, 1997b. *Permit for the Storage and Treatment of Hazardous Waste.* Permittee U.S. Army Chemical Depot, Hermiston OR 97838. Permit # OR 6213820917 for UMCD. 1997.

ODEQ, 1997c. *Permit for the Storage and Treatment of Hazardous Waste.* Permittee U.S. Army Chemical Depot, Hermiston OR 97838. Permit # ORQ 000 009 431 for UMCDF. 1997.

ODEQ, 2002. *Standard Air Contaminant Discharge Permit.* Permit Number: 25-0024. Permittee U.S. Army Umatilla Chemical Depot, Hermiston OR 97838. 2002.

ODEQ, 2006a. *Water Pollution Control Facilities Permit.* Oregon Department of Environmental Quality, Eastern Region-Pendleton Office, Permit no. 102031. 2006.

ODEQ, 2006b. 2003 Lower Umatilla Basin Groundwater Management Area Synoptic Sampling Event Report. 2006.

ODEQ, 2011. Letter, Termination of Solid Waste Permit No. 320. August 2011.

OHM Remediation Services Corp, 1997. Final Project Closeout Report, Contaminated Soil Remediation, Ammunition Demolition Area and Miscellaneous Sites, Umatilla Chemical Depot. Prepared for the U.S. Army Corps of Engineers. Oct. 1997.

SCS Engineers, 2009. 2008 Annual Report for Umatilla Chemical Depot Explosives Washout Lagoons Groundwater Treatment System. Prepared for U.S. Army Corps of Engineers, Seattle District. Jan. 2009.

SCS Engineers, 2009, Pulse Pumping Optimization Evaluation, August 2009 Pulse Pumping Event, Umatilla Chemical Depot Explosives Washout Lagoons Pump and Treat System, Hermiston, Oregon.

Seattle District Real Estate Division, 2008. *Umatilla Chemical Depot Morrow and Umatilla Counties Oregon*. Title Report. Aug. 2008.

UMCD Archive Document, 1994. Partial Record of Historic Above Ground Storage Tank Inventory. UM012578 UM4421-2. Aug. 1994.

UMCD Archive Document, 1999. First Five-Year Review. Umatilla Chemical Depot Hermiston, Oregon. UM003362 UM0659-1. 1999.

UMCD Archive Document, 2002. Memorandum for Commander, Tooele Army Depot. Umatilla Depot Activity (UMDA) Radon Program. UM005162 UM1482-1. Jun. 21, 1993.

UMCD Archive Document, 2005. *Umatilla Chemical Depot Hazardous Waste Management Plan*. UM019165 UM007344-3. Apr. 2005.

U.S. Army, 1992. Record of Decision for Umatilla Depot Activity Explosives Washout Lagoons Soils Operable Unit. Sept. 1992.

U.S. Army, 1993. Final Record of Decision for Umatilla Depot Activity Active Landfill Operable Unit. Mar. 1993.

U.S. Army, 1994. Final Record of Decision for Umatilla Depot Activity Explosives Washout Plant Operable Unit. Jun. 1994.

U.S. Army, 1995. Explanation of Significant Difference for Umatilla Depot Activity Explosives Washout Plant Operable Unit. Aug. 1995.

U.S. Army, 1997a. Environmental Monitoring Plan for the Umatilla Chemical Depot Closed Landfill. 1997.

U.S. Army, 1997b. Explanation of Significant Difference for Umatilla Depot Activity Explosives Washout Lagoons Soils Operable Unit. Sept. 1997.

U.S. Army, 2002. Explanation of Significant Differences, Umatilla Chemical Depot, Ammunition Demolition Activity Area, Operable Unit, Site 19E/F. June 2002.

U.S. Army 2020. Explanation of Significant Differences (ESD) Umatilla Chemical Depot Deactivation Furnace Operable Unit, Site UMAD-0047, May 2020.

U.S. Army 2020. Explanation of Significant Differences (ESD) Umatilla Chemical Depot Former Active Landfill, Site UMAD-0034, May 2020.

U.S. Army 2021. Memorandum for Administrative Record (MFR) Land Use Restrictions for Site UMAD-0039 (Quality Assurance Function Range) at the Umatilla Chemical Depot, Oregon, May 2021.

US Army BRAC 2017 Environmental Condition of Property Report Umatilla Chemical Depot – Oregon. June 2017

US Army BRAC 2019 Environmental Condition of Property Report Umatilla Chemical Depot – Oregon. July 2019

U.S. Army Chemical Materials Agency (CMA), 2004. *Spill Prevention Control and Countermeasures Plan and Installation Contingency Plan*. U.S. Army Chemical Depot, RCRA Part B Permit Application. Mar. 2004.

U.S. Army CMA, 2008. Umatilla Chemical Depot Discharge Monitoring Report 1st Quarter CY 2008. Prepared for the ODEQ. Apr. 2008.

U.S. Army Corps of Engineers (USACE) and Ecology and Environment, Inc., 1992. Feasibility Study for the Deactivation Furnace (Site 1) Soils Operable Unit, Umatilla Army Depot Activity (UMDA), Hermiston, Oregon. Prepared for the U.S. Army Depot Activity Umatilla, Hermiston, Oregon. 1992.

USACE, 1998. Remedial Action Report Contaminated Soil Remediation, Miscellaneous Sites OU; Umatilla Chemical Depot, Hermiston, Oregon. Seattle District. May 1998.

USACE, 2004. Second Five-Year Review Report for Umatilla Chemical Depot, Hermiston, Umatilla and Morrow Counties, Oregon. Oct. 2004.

USACE, 2010. Final Third Five-Year Review Report for Umatilla Chemical Depot, Hermiston, Umatilla and Morrow Counties, Oregon. Mar. 2010.

USACE 2010 US Army BRAC 2010 Environmental Condition of Property Report Umatilla Chemical Depot – Oregon. August 2010

USACE, 2011. Focused Feasibility Study for Groundwater at the Explosives Washout Lagoons (EWL) Area, Operable Unit 3 (OU3), at the Umatilla Chemical Depot, Umatilla, OR. Prepared for the U.S. Army and BRACD. December 2011.

USACE 2013 US Army BRAC 2013 Environmental Condition of Property Report Umatilla Chemical Depot – Oregon. September 2013

U.S. Army Toxic and Hazardous Materials Agency, 1979. *Installation Assessment of Umatilla Army Depot Activity*. Report No. 142. Aberdeen Proving Ground, MD. May 1979.

USEPA, 2006. *Interim Guidance for EPA's Base Realignment and Closure (BRAC) Program*. Federal Facilities Restoration and Reuse Office, Office of Solid Waste and Emergency Response. Apr. 2006.

U.S. Department of Defense (DoD), 2006. *Base Redevelopment and Realignment Manual*. Office of the Deputy Under Secretary of Defense

USACE, 2009. Site 39 Quality Assurance Function Range, Umatilla Chemical Depot After Action Report, August 2009.

Enclosure 3

Table 1 DESCRIPTION of the PROPERTY

Study Section	Study Site Name	Acres	ECP Parcel Designation	Cond Type*	Description
II	Building 202 area	2.0	18(3)HR	3	Asbestos on the ground around the building. Picked up in 2015 and the building was demolished in 2018.
II	Southwestern Warehouses (10 acres) Site 69 Skunk Works Area	10	19(3) HS, HR, PS	3	Area of a cluster of sites for warehousing, railroad unloading, and stockpiling activities. Skunk Works reportedly was used for cleaning of copper and brass cartridges
II	Site 1 Deactivation Furnace (1.2 acres) Site 25I Metal Ore Piles (3.3 acres) Site 26 Metal Ingot Stockpile (11.0 acres) Site 44 II Road Oil Application/Disposal Building 210 (0.3 acres)	15.8	20(4)HR, HS, PR,PS	4	Site 1: Located in the southwest corner of the property, it was used to deactivate small munitions. All remediation is complete and no further action required. LUCs were implemented based on the 2020 ESD. Site 25I: Metal Ore Piles consisted of three piles of chromium ore located near the southern boundary of the K-Block igloos. Site 26: The piles consisted of 6-foot-high stacks of aluminum, lead, and zinc ingots in direct contact with the soil. Recommended NFA. Site 44 II: spill of hardened road oil material, occupying approximately 100 square feet.
II	Building 100 Warehouses	12.7	21(3) HR, HS,PS	3	100 area warehouses: Most of the 100 area warehouses have been demolished, thus removing all asbestos.

Study Section	Study Site Name	Acres	ECP Parcel Designation	Cond Type*	Description
	<p>Site 35 Malathion Storage Leak Area</p> <p>Site 37 Building 131 Paint Sludge Discharge Area</p> <p>Site 46 Railcar Unloading Area</p> <p>Site 68 UDMH Operations Area (Building 129)</p>				<p>Site 35: Leaking 5-gallon insecticide (malathion) containers was stored on the gravel to the north of Building 108</p> <p>Site 37: According to a former employee, a depression to the west of the building was used to collect paint sludge and solvents. A wooden conduit and metal pipe may have transferred paint sludge and waste material from Building 131: Soil samples were collected from the discharge area and metals and wooden conduits. Results recommended NFA.</p> <p>Site 46: Near the railroad tracks in the southwest portion of UMCD. It was used for coal or ore storage from at least 1949 to the early 1960s. Former employees also report that the area was used for unloading brass bullets. Soil samples were taken and indicate NFA.</p> <p>Site 68: Building 129 was used to conduct stability tests of UDMH. Red Fuming Nitric Acid (RFNA) may also have been tested. Waste materials from the testing operations were drained through lead-lined pipes into a lime pit. Soil sample results indicate NFA.</p>
II	Building 101 and nearby UST	Acres above in	22(3) HR, PS	3	Asbestos siding that had fallen on the ground picked up in 2015 during a

Study Section	Study Site Name	Acres	ECP Parcel Designation	Cond Type*	Description
	(acreage included above)	Bldg 100 area			housekeeping action. UST removed.
II	Site 81-1 Former Raw Material Storage Locations and adjacent AST and Radionuclides (RAD) air monitoring station.	6.7	24(3)HR,PS	3	Site 81-1: These are areas in the southwestern warehouse area of UMCD where materials, such as coal and ore, were stored in direct contact with soils. Sample results recommended NFA.
III	Site 81-2 Former Raw Material Storage Locations (2.0 acres) Site 66 Brass, Copper and Steel Storage Area (1.4 acres)	3.4	36(3)HR, HS,PS	3	Site 81-2: Area in SE corner of Block H where raw materials were stored in direct contact with soils Site 66: This site is located near the railroad tracks south of Igloo H-Block. Copper, brass, and steel were stored at this site after being unloaded from the railcar NFA required.
IV	Site 10 Mustard Agent (HD) and Storage Area Site 49: Drill and Transfer Site	8.6	41(3)HR	3	Site 10: Mustard agent storage area, which was an open gravel strip of ground approximately 100ft x 2,000-3,000ft, used to store 1-ton containers of mustard blister agent. Soil sampling in the area indicated that remediation was not necessary. Site 49: Leaking chemical munitions were drilled, emptied, and decontaminated at the site. Soil sampling in the area indicated that remediation was not necessary.

Study Section	Study Site Name	Acres	ECP Parcel Designation	Cond Type*	Description
V	Umatilla Chemical Disposal Facility (UMCDF)	63.2	42(4) HS, PS	4	Chemical demilitarization facility site built, operated, and closed under RCRA
V	Site 51 Large Open Areas (vicinity of Coyote Coulee) (22.9 acres) Site 62 Paint and Solvent Disposal Area (1.3 acres)	24.2	43(3)HR	3	Site 51: Northwest of Rim Road and the C-block igloos. The area has been used as a gravel borrow and storage. Sampling results indicated no action is necessary. Site 62: This area is located along the Coyote Coulee north of Center Road. Paint and solvent waste generated from a building formerly located to the east was disposed here. Investigation indicated that no remedial action is necessary.
VIII	Site 43 Former Gas Station/ Possible UST Location (UST 59 – 62) (Central UMCD Grounds)	4	44(2)PS/PR	2	Site 43: gasoline station was once located in the central portion of UMCD, at the intersection of Rim and Center Roads.
V	Explosive Washout Lagoons Groundwater Plume (CDA portion is 177.25 acres)	177.2	45(4) HR	4	The explosive Washout Lagoon OU is located in the central portion of the Depot. The groundwater contamination plume was caused by disposal of munitions constituents. The plume extends into Parcel 1. All groundwater remediation activities within the CDA Parcel are in place and operating properly and successfully. The groundwater in this portion of the Property has not been remediated to levels suitable for unrestricted use, and will

Study Section	Study Site Name	Acres	ECP Parcel Designation	Cond Type*	Description
					transfer with LUCs to restrict groundwater extraction and use.
VII	Former USTs (94 & 97) at bldg. 433 along Birch Road	1.9	46(2) PS, PR	2	USTs 94 & 97 were both removed along with petroleum contaminated soil. Release of petroleum only. NFA.
VII	Building 421	0.03	47(3)HR	3	Was categorized for asbestos and radon. Cement asbestos shingles that had fallen to the ground were picked up in June 2017. NFA required.
VI	Site 50 Railroad Landfill Areas (CDA portion is 10 acres)	10	52(3)HR, PR	3	Site 50: two railroad landfills are located in the south-central portion of UMCD, one located north of the railroad tracks and one south of the railroad classification yard Acreage for Parcel 1.
VIII	Former Airport UST	1.5	53(2)PS/PR	2	Tank 96: 500 gal UST near the airport. Removed in 1992
VIII	Former UST Southeast of Airport	1.22	54(2)PS/PR	2	Tank 41: 1,000 gal. Removed in 1994
VIII	Site 61 Open Paint Spray Areas	21.7	55(3)HR	3	Site 61: Reportedly used in the 1950s and 1960s to conduct outdoor spray-painting. Soil sampling in the area indicated that no remediation is necessary.
VIII	Site 79 Malathion Spray Area	2.2	56(3)HR	3	Located in the northeast corner of Igloo Block C, this area is reported to have been sprayed with the insecticide malathion during a commercial over-flight operation near UMCD. Soil sampling indicated that no presence of TCL pesticides or malathion.

Study Section	Study Site Name	Acres	ECP Parcel Designation	Cond Type*	Description
VIII	Site 34 Closed Active Landfill	17.49	58(4)HR	4	The Active Landfill OU was closed in 1997. It was a permitted solid waste disposal area located on the northeast edges of the D-block igloos. The property will transfer with LUCs to restrict potential exposure to the landfill waste and protect the integrity of the cap.
VIII	Site 39 Quality Assurance (QA) Function Range	259.0	60(4)HR	4	The QA Function Range is located on the northeast corner of UMCD and occupies 670 acres. The central portion of the site served as a rifle and pistol range. The southern portion of the site, served as a QA testing area for flares, photoflash grenades, and mines. Removal actions are complete and have received DDESB approval. The property was not remediated to levels suitable for unrestricted use, and will transfer with LUCs to prevent exposure to the remaining contamination.
VII	Site 44 I Road Oil Application/ Disposal Sites (CDA portion is 4 acres)	4	79(3) HS,HR,PS, PR	3	Area for road oil disposal and possible spills (mid-1950s through the mid-1960s), road oil and tar drum storage (late 1940s), oil changing activities including draining waste oil directly into the soil (late 1940s), and possible storage of transformers containing PCBs. Soil remediation was completed in 1997 with no further action required.
V	All J-Block Igloos (11.2)	2	99(4)HS	4	J-Block igloos stored hazardous substances under a

Study Section	Study Site Name	Acres	ECP Parcel Designation	Cond Type*	Description
	acres; (CDA portion is 2 acres)				RCRA permit. Will transfer with LUCs.

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred. (including no migration of these substances from adjacent areas)

Category 2: Areas where only the release or disposal of petroleum products or their derivatives has occurred.

Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.

Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

NFA = No Further Action (required)

HS =Hazardous Substance Storage

HR = Hazardous Substance Release

PR = Petroleum Release

PS = Petroleum Storage

Enclosure 4

TABLE 2

NOTIFICATION OF HAZARDOUS SUBSTANCE STORAGE, RELEASE OR DISPOSAL

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Site 1: Deactivation Furnace	Located in the southwest corner of the property, it was used to deactivate small munitions. Closed per ROD in 1992.	Release 1950 - 1988	Contaminated soils were treated and buildings and related structures were demolished and removed from the site. The property was not remediated to levels suitable for unrestricted use, and will transfer with LUCs to protect against residential use of any type, agricultural use of any type, child care facilities and recreational uses where children may be present, including playgrounds, and nursing home or assisted living facilities, and educational facilities for children/young adults in grades K through 12.
Site 24: Explosive Washout Lagoons (EWL) OU Groundwater Plume	The lagoons were used as settling ponds for munitions operations. RDX and TNT leached into the groundwater.	Release: 1955 to 1965	Lagoon area is west of CDA parcel, with the plume extending into Parcel 1. The property has not been remediated to levels suitable for unrestricted use, and will transfer with LUCs. <ul style="list-style-type: none"> - No accessing groundwater - No installation of wells or drilling into aquifer. - No disturbance of associated wells. - No residential use of any type, - No agricultural use of any type, - No child care facilities and recreational uses where children may be present, including playgrounds;

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
			<ul style="list-style-type: none"> - No nursing home or assisted living facilities, - No educational facilities for children/young adults in grades K through 12.
Site 10: Mustard Chemical Agent Open Storage Area.	Mustard Agent was stored in this area. There were reports from employees for possible leaks.	Storage/ Possible Release: Was used for storage from 1960s – 1978.	Soil sampling indicated no contamination, so remediation was not required.
Site 34: Active Landfill, 17.49 acres in 50' depression.	Garbage, demolition debris, asbestos from brake linings, dried sludge from the sewage treatment plant, possibly ash from the Deactivation Furnace, and sludges that contained explosive residuals.	Disposal: 1968 – 1997	<p>Closed in 1997 IAW ODEQ solid waste regulations with groundwater monitoring (completed) and continuing LUCs:</p> <ul style="list-style-type: none"> - No driving on site - No digging, shoveling, auguring, - No disturbing signage - No disturbing adjacent monitoring wells - No extraction wells in adjacent area
Site 25 I & II Metal Ore Piles	The Metal Ingot Stockpiles consisted of several lead and aluminum ingots stacked in piles in open-air storage areas.	Unknown	All remediation on the site is complete and the site deemed no further action (NFA)
Site 26 Metal Ingot Stockpile	Piles consisted of 6-foot-high stacks of aluminum, lead, and zinc ingots in direct contact with the soil.	Unknown	All remediation on site is complete and deemed NFA.
Site 35 Malathion Storage Leak Area	Former UMCD employees reported that a shipment of leaking 5-gallon insecticide (malathion) containers was stored on the gravel	Release: late 1970s	Soil sampling indicated remediation was not required because no contamination was found.

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
	to the north of Building 108.		
Site 37 Building 131 Paint Sludge Discharge Area	A depression to the west of the building was used to collect paint sludge and solvents.	Unknown	None, contamination, if any, was below action levels.
Site 39: QA Function Range	Rifle and pistol munitions, flares, photoflash grenades, and mines	1945 to 1975	<p>MEC was cleared to a depth of two feet in the Rifle Range Area (107 acres) and in the Test Pad Area (68 acres), and to a depth of six feet in the Test Pit Area (1 acre). It included sifting the soil to a depth of two feet in the vicinity of three former QA function test pads, where a high density of geophysical anomalies was found.</p> <p>In a March 2011 memorandum from the DDESB, the ESS submission for NFA was accepted and concluded remedial actions at this site. The property was not remediated to levels suitable for unrestricted use, and will transfer with LUCs allowing only Agricultural use, incidental residential, which includes a farm house, and barn and utility buildings and limited recreational use (e.g. hiking and hunting).</p>
Site 44 (I &II) Road Oil Application/ Disposal Sites	Road oil disposal and possible spills	1940s – 1960s	None, contamination, if any, was below action levels.
Site 46 Railcar Unloading Area	Used for coal or ore storage from at least.	1949 to the early 1960s	None, contamination, if any, was below action levels.

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
Site 49: Drill and Transfer Site	Chemical Munitions were stored and managed here. Employees reported possible leaks.	Release: 1984	Soil sampling indicated no contamination, so remediation was not required.
Site 50 Railroad Landfill Areas	Low levels of oil and grease.	Release: 1956 - 1970	None, contamination, if any, was below action levels.
Site 51: Large Open Areas in the Vicinity of Coyote Coulee	Gravel borrow pits had paint cans.	Release: Unknown, prior to 1997	Soil sampling indicated no contamination, so remediation was not required.
Site 61: Outdoor Spray Paint Area	Spray Paint	Release: 1950s and 1960s	None, contamination, if any, was below action levels.
Site 62: Paint and Solvent Disposal Area	Paint and solvent waste	Release: Unknown, prior to 1997	None, contamination, if any, was below action levels.
Site 66: Brass, Copper and Steel Storage Area	This site is located near the railroad tracks south of H-Block. Copper, brass, and steel were stored at this site after being unloaded from the railcar.	Release: Unknown	None, contamination, if any, was below action levels.
Site 68: UDMH Operations Area (Building 129)	Used to conduct stability test of UDMH and, potentially, red fuming nitric acid. Waste materials from the testing operations were drained through lead-lined pipes into a lime pit.	Release: Unknown	Soil sampling indicated no contamination, so remediation was not required.
Site 69: Skunk works Area	Located within the Deactivation Furnace and Southwestern Warehouse Area, this area was reported to be used for cleaning of copper and brass cartridges in hydrochloric acid baths and WEDAC	Release: Unknown	None, contamination, if any, was below action levels.

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
	(commercial cleaner) solutions, which were then either dumped at this site or burned at the ADA grounds.		
Site 79, northeast corner of C-Block	Area is reported to have been sprayed with the insecticide malathion during a commercial over-flight operation near UMCD.	Release: from off-post. Prior to 1992.	Soil sampling indicated no contamination, so remediation was not required.
Site 81: I & II Former Raw Material Storage Locations and adjacent aboveground storage tank (AST) and RAD air monitoring station	This site is located on the south edge of the ADA and consists of two locations, I and II, where raw materials, possibly coal or ore, were stored.	Release: 1940s and 1950s.	None, contamination, if any, was below action levels.
J-Block Igloos, 1735, 1736, 1750, 1751, 1752, 1765, 1766, 1767, 1780, 1781, 1782, 1783, 1794, 1795, 1796, 1808, 1809, and 1810 RCRA permitted CSF	Hydrochloric Acid Muriatic Acid, Isopropyl Alcohol, Paint Thinner, batteries, Sodium Hypochlorite Solution 3.23%, Sodium Hydroxide, Sulfuric Acid, Acetic Acid, Calcium Hypochlorite (HTH).	Storage: 1962 - 2013	None Required. This was a RCRA storage area with no known releases. Property will transfer with LUCs to protect against residential use of any type, agricultural use of any type, child care facilities and recreational uses where children may be present, including playgrounds; and nursing home or assisted living facilities, and educational facilities for children/young adults in grades K through 12.
Building 115 Satellite Accumulation Area	Stored petroleum, oils, lubricants, flammables, and corrosives on spill pallets. It also housed an aerosol can puncturing unit.	Storage: 1962 - 2013	None Required. This was a RCRA storage area with no known releases. Property will transfer with LUCs to protect against residential use of any type, agricultural use of any type, child care facilities and

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
			recreational uses where children may be present, including playgrounds; and nursing home or assisted living facilities, and educational facilities for children/young adults in grades K through 12.
Building 203 RCRA permitted CSF	For the Building 203 CSF, COCs are RCRA metals (including mercury), pesticides, organics, and PCBs.	Storage: 1962 - 2013	None Required. This was a RCRA storage area with no known releases. Property will transfer with LUCs to protect against residential use of any type, agricultural use of any type, child care facilities and recreational uses where children may be present, including playgrounds; and nursing home or assisted living facilities, and educational facilities for children/young adults in grades K through 12.
UMCDF	This facility was built for the disposal of chemical agents, Mustard (HD), Serin (GB), and VX; The UMCDF facility was demolished per RCRA closure requirements. Other parts of the facility may have contained hazardous materials required for maintenance activities. There were satellite accumulation sites and a hazardous material and hazardous waste storage facility.	1997 -2015	None required. This is a RCRA permitted Treatment, Storage and Disposal Facility (TSDF) being closed under RCRA; No release of a hazardous substance or petroleum product. Property will transfer with LUCs to protect against residential use of any type, agricultural use of any type, child care facilities and recreational uses where children may be present, including playgrounds; and nursing home or assisted living facilities, and educational facilities for children/young adults in grades K through 12.

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
<p>* The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or 'Superfund') 42 U.S.C. §9620(h). This table provides information on the storage of hazardous substances for one year or more in quantities greater than or equal to 1,000 kilograms or the hazardous substances' CERCLA reportable quantity (whichever is greater). In addition, it provides information on the known release of hazardous substances in quantities greater than or equal to the substances CERCLA reportable quantity. See 40 CFR Part 373.</p>			

Enclosure 5
TABLE 3
NOTIFICATION OF PETROLEUM PRODUCT STORAGE, RELEASE, OR DISPOSAL

Building Number	Storage Tank (UST/AST) Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Site 43 Rim Road and Center Road	59-62	Gasoline	Approximately: 1949 to prior to 1958	Twenty-five soil gas samples indicated trace concentrations of benzene, toluene, xylene, and TVHCs. The report determined that these concentrations do not represent a significant point source like a leaking UST, but suggest minor surface spillage or the introduction of asphalt constituents. Low concentrations indicated remediation was not required.
Site 44 (I & II) Road Oil Application/ Disposal Sites	None	Road Oil	1940s – 1960s	Site 44 includes areas I and II. The first area reportedly experienced road oil disposal and possible spills (mid-1950s through the mid-1960s), road oil and tar drum storage (late 1940s), oil changing activities including draining waste oil directly into the soil (late 1940s), and storage of 50 to 60 transformers containing Polychlorinated Biphenyls (PCB) contaminated oil. The second area experienced a spill of hardened road oil material, occupying approximately 100 square feet. No PCBs were present and remediation of other contaminants was not required because contamination, if any, was below action levels. No further action required (NFA).

Building Number	Under-ground Storage Tank (UST) Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
104	52	Diesel	Unknown; Removed 1993	NE corner of Building 104 (foundation); Confirmation soil samples analyzed for HCID. ND in all three samples.
105	35	Diesel	Unknown; Removed 1993	North of northeast corner of building; ND in all three samples.
106	36	Diesel	Unknown; Removed 1993	South of southwest corner of building. Confirmation soil samples were analyzed for TPH, EPA 8010 for halogenated solvents, Benzene, Toluene, Ethyl-benzene, Xylenes (BTEX) and total lead. Results show ND in all samples collected.
113	99	Unknown	Unknown	Geophysical and soil gas survey was conducted during the UST investigation. Results for the geophysical survey indicate UST unlikely present. Trace volatiles detected at 2 of the 20 soil gas samples collected. Concentrations are not indicative of widespread contamination from a UST point source.
115	37	Heating oil	Unknown; Removed 1993	East of 115. ND in both samples collected.
116	32	Unknown	Unknown; Removed 1995	Petroleum Contaminated Soil (PCS) excavated during UST removal. ND in all confirmation samples.
117	38	Heating oil	Unknown; Removed 1993	Northwest of Building 117. Confirmation soil samples were analyzed for TPH, EPA 8010 for halogenated solvents, BTEX and total lead. Results show ND in all samples collected.
129	33	Unknown	Unknown; Removed 1995	PCS excavated during UST removal. ND in all confirmation samples.

Building Number	Under-ground Storage Tank (UST) Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
130	40	Diesel	Unknown; Removed 1993	West of Building 130; In one sample there was an initial HCID detection, but ND upon fractionation; ND in remaining two samples.
131	24	Heating oil	Unknown; Removed 1993	East of building 131; ND in all three samples.
133	49	Gasoline	Unknown; Removed 1993	South of Building 133; ND in all eight samples.
133	50	Gasoline	Unknown; Removed 1993	SW of Building 133; Confirmation soil samples collected and analyzed for HCID were ND.
135	48	Gasoline	Unknown; Removed 1993	At SE corner of Building 135; ND in all three samples.
154	26	Diesel	Unknown; Inactive, Not Present or Removed	Passed a tank leak test conducted during the 1995. According to UMCD officials, these tanks are either inactive or removed.
158	27	Diesel	Unknown; removed	Passed a tank leak test conducted during the 1995. According to UMCD officials, these tanks are either inactive or removed.
164	28	Diesel	Unknown; Inactive, Not Present or Removed	Passed a tank leak test conducted during the 1995. According to UMCD officials, these tanks are either inactive or removed.
168	29	Diesel	Unknown; Inactive, Not Present or Removed	Passed a tank leak test conducted during the 1995. According to UMCD officials, these tanks are either inactive or removed.

Building Number	Under-ground Storage Tank (UST) Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
160	47	Gasoline	Unknown; Removed 1993	At SW corner of Building 160; initial HCID detection of diesel range - ND upon fractionation DRO analyses; ND in remaining samples.
201	1	Diesel	Unknown; Inactive, Not Present or Removed	Passed a tank leak test conducted during the 1995. No information on its current status was found. According to UMCD officials, this tank is either inactive or removed.
206	87	Unknown	Unknown; Removed	(Deactivation Furnace) Four of seven samples detected TPH below regulatory limits. No Further Action required.
208	13	Heating oil	Unknown; Removed 1995	PCS excavated during UST removal. ND in all confirmation samples.
433	25	Heating oil	Unknown; Removed 1995	PCS excavated during UST removal. ND in all confirmation samples.
433	94	Heating oil	Unknown; Removed 1995	Blow-down vessel associated with a boiler system. The vessel and associated PCS was removed. ND in all confirmation samples.
433	97	Heating Oil	Unknown; Removed 1995	A former condensate "blow- down" tank, it was exposed at surface and installed vertically in the ground with no bottom. Visible oily soil and sludge were revealed in the excavation. 250 cubic yards of soil were removed. Results for excavation confirmation soil samples ORTPH-HCID were ND. Excavation was backfilled with clean material.

Building Number	Under-ground Storage Tank (UST) Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
486	92	Unknown	Unknown; Inactive, Not Present or Removed	NFA
Airport Runway Tank	N/A	Diesel	Unknown;	Former diesel tank; no field evidence of leak. Confirmation samples analyzed for TPH-g, EPA 8010 for halogenated solvents, BTEX, and EPA 7421 total lead. Low levels of lead detected in one sample, ND in remaining samples.
Former ASTs 5 and 6 along Juniper Road, SE of F-Block	5 & 6	Unknown	Unknown	Petroleum storage only. There was no release of a hazardous substance or petroleum product and the property can be identified as uncontaminated.
Airport	41	Heating oil or gasoline	Unknown; Removed 1992	South of airstrip; conflicting accounts on whether this was a gasoline or a diesel tank. In 1992 during the tank removal, six samples collected and analyzed for TPH-g, BTEX and Lead. Three samples detected~50 ppm TPH-g. Additional PCS was removed and the site was closed via Nov. 4, 1992 Oregon Department of Environmental Quality (ODEQ) letter. During the 2000 investigation Dames & Moore identified the tank as former diesel tank, collected three samples and analyzed them for NW TPH-HCID. Results were ND.

Building Number	Under-ground Storage Tank (UST) Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
Airport	96	Unknown	Removed 1994	Adjacent to the former airfield. No previous information was found in the records. It appeared to be associated with a water pressure tank. Odorless, colorless liquid was found in the tank, and was sampled for VOAs, Base-neutral and Acid Extractable Organics (BNA), metals, Pesticides, PCBs, TPH, and nitrate/nitrite. Results found elevated concentrations of iron, lead, and manganese. The tank was removed.
UMCDF (MDB; Bldg 383)-Regulated	OIL-TANK-101	Diesel	Storage: 1999 to 2012	Regulated (UST-BECCC) 4,000 gallon tank; removed.
UMCDF (ECF; Bldg 380)-Regulated	ECF-TANK-101		Storage: 1999 to 2012	Regulated (UST-BECCB) 600 gallon tank; removed.

Enclosure 6

TABLE 4

NOTIFICATION OF MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)*

Site	Type of MEC	Date of MEC Activity	Munitions Response Actions
Site 39: Quality Assurance (QA) Function Range	Rifle and pistol munitions, flares, photoflash grenades, and mines	1945 to 1975	Clearance of MEC to a depth of two feet in the Rifle Range Area (107 acres) and in the Test Pad Area (68 acres), and to a depth of six feet in the Test Pit Area (1 acre). It included sifting the soil to a depth of two feet in the vicinity of three former QA function test pads, where a high density of geophysical anomalies was found. On 30 November 2010 U.S. Army Corps of Engineer (USACE) Seattle, on behalf of USACE Huntsville, submitted an explosive safety submission for no further action and at this operable unit to the DDESB. On 16 March 2011, as stated in a memorandum received from the DDESB, the ESS was accepted and concluded remedial actions at Study Site 39.
<p>*<u>Munitions and Explosives of Concern (MEC)</u>. This term, which distinguishes specific categories of military munitions that may pose unique explosives safety risks, means: (A) Unexploded Ordnance (UXO), as defined in 10 USC §101(e)(5); (B) Discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (C) Munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.</p>			

Enclosure 7

CERCLA NOTICE, COVENANT, and ACCESS PROVISIONS and OTHER DEED PROVISIONS

The following CERCLA Notice, Covenant, and Access Provisions, along with the Other Deed Provisions, will be placed in the deed to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities.

I. Property Covered by Notice, Description, Access Rights, and Covenants Made Pursuant to Section 120(h)(3)(A) of the Comprehensive Environmental Response Compensation, and Liability Act of 1980 (42 U.S.C. Section 9620(h)(3)(A)):

For the Property, the Grantor provides the following notice, description, and covenants and retains the following access rights:

A. Notices Pursuant to Section 120(h)(3)(A)(i)(I) and (II) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. Section 9620(h)(3)(A)(i)(I) and (II)):

Pursuant to section 120(h)(3)(A)(i)(I) and (II) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(i)(I) and (II)), available information regarding the type, quantity, and location of hazardous substances and the time at which such substances were stored, released, or disposed of, as defined in section 120(h), is provided in Exhibit _____ (Notification of Hazardous Substance Storage, Release or Disposal), attached hereto and made a part hereof.

B. Description of Remedial Action Taken, if Any, Pursuant to Section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(i)(III)):

Pursuant to section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(i)(III)), a description of the remedial action taken, if any, on the Property is provided in Exhibit ____ (Notification of Hazardous Substance Storage, Release or Disposal), attached hereto and made a part hereof.

C. Covenant Pursuant to Section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(ii) and (B)):

Pursuant to section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(ii) and (B)), the United States warrants that -

(a) All remedial action necessary to protect human health and the environment with respect to any hazardous substance identified pursuant to section 120(h)(3)(A)(i)(I) of the Comprehensive

Environmental Response, Compensation, and Liability Act of 1980 remaining on the property has been taken before the date of this deed, and

(b) Any additional remedial action found to be necessary after the date of this deed shall be conducted by the United States.

D. Access Rights Pursuant to Section 120(h)(3)(A)(iii) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(iii)):

The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the Property, to enter upon the property in any case in which a remedial action or corrective action is found to be necessary on the part of the United States, without regard to whether such remedial action or corrective action is on the Property or on adjoining or nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, test pitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the Grantee and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the Grantee or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the Property and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the Grantee's and the Grantee's successors' and assigns' quiet enjoyment of the Property. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the property at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the Grantee, nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the United States.

In exercising such easement and right of access, neither the Grantee nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer or employee of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause: Provided, however, that nothing in this paragraph shall be considered as a waiver by the grantee and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

II. OTHER DEED PROVISIONS:

A. “AS IS”

a. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property and accepts the condition and state of repair of the Property. The Grantee understands and agrees that the Property is conveyed “AS IS” without any representation, warranty, or guaranty by the Grantor as to quantity, quality, title, character, condition, size, or kind, or that the same is in a suitable condition or fit to be used for the purposes intended by the Grantee, and no claim for allowance or deduction upon such grounds will be considered.

b. No warranties, either express or implied, are given with regard to the condition of the Property including, without limitation, whether the Property does or does not contain asbestos or lead-based paint. The Grantee shall be deemed to have relied solely on its own judgment in assessing the condition of the Property including, without limitation, any asbestos, lead-based paint, or other conditions on the Property. The failure of the Grantee to inspect or to exercise due diligence to be fully informed as to the condition of the Property will not constitute grounds for any claim or demand against the Grantor.

c. Nothing in this “As Is” provision will be construed to modify or negate the Grantor’s obligation under the “Covenant Pursuant to Section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(ii) and (B))” or any other statutory obligations.

B. HOLD HARMLESS

a. To the extent authorized by law, the Grantee, its successors and assigns, covenant and agree to indemnify and hold harmless the Grantor, its officers, agents, and employees from (1) any and all claims, damages, judgments, losses, and costs, including fines and penalties, arising out of the violation of the notices, use restrictions, and restrictive covenants in this Deed by the Grantee, its successors and assigns, and (2) any and all any and all claims, damages, judgments, losses, and costs arising out of, or in any manner predicated upon, exposure to asbestos, lead-based paint, or other condition on any portion of the Property after the date of the conveyance herein.

b. The Grantee, for itself, its successors and assigns, covenants and agrees that the Grantor shall not be responsible for any costs associated with modification or termination of the notices, use restrictions, and restrictive covenants in this Deed including, without limitation, any costs associated with additional investigation or remediation of asbestos, lead-based paint, or other condition on the Property.

c. Nothing in this Hold Harmless provision will be construed to modify or negate the Grantor’s obligation under the “Covenant Pursuant to Section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(ii) and (B))” or any other statutory obligations.

C. POST-TRANSFER DISCOVERY OF CONTAMINATION

If an actual or threatened release of a hazardous substance is discovered on the Property after the date of the conveyance herein, the Grantee, its successors or assigns shall be responsible for such release or threatened release of such newly discovered hazardous substance unless the Grantee, or its successors or assigns is able to demonstrate that such release or threatened release of a hazardous substance was due to the Grantor's activities, use, or ownership of the Property. If the Grantee or its successors or assigns believe the newly discovered hazardous substance is due to the Grantor's activities, use, or ownership of the Property, the Grantee or its successors or assigns shall immediately secure the site and notify the Grantor of the existence of the hazardous substance and the Grantee or its successors or assigns shall not further disturb or allow the disturbance of such hazardous substance without the prior written permission of the Grantor.

The Grantee, for itself, its successors and assigns, as part of the consideration for the conveyance of the Property, hereby releases the Grantor from any liability or responsibility for any claims arising solely out of the release or threatened release of any hazardous substance on the Property occurring after the date of the conveyance herein where such hazardous substance was placed on the Property by the Grantee, or its successors, assigns, employees, invitees, agents, contractors, or any person other than the Grantor after the date of the conveyance herein. This "Post-Transfer Discovery of Contamination and Release" provision shall not affect the Grantor's responsibilities to conduct response actions or corrective actions that are required by applicable laws, rules and regulations, or the Grantor's obligation under the "Covenant Pursuant to Sections 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §§ 9620(h)(3)(A)(ii) and (B))."

D. ENVIRONMENTAL PROTECTION PROVISIONS

The Grantee shall neither transfer the Property, lease the Property, nor grant any interest, privilege, or license whatsoever in connection with the Property without including the "Environmental Protection Provisions" set forth in Exhibit ____, attached hereto and made a part hereof, and shall require the said provisions be included in all subsequent deeds, easements, transfers, leases, or grant of any interest, privilege, or license in, of, on, or to the Property or any portion thereof.

Enclosure 8

ENVIRONMENTAL PROTECTION PROVISIONS

The following conditions, restrictions, and notifications will be attached, in a substantially similar form, as an exhibit to the deed and be incorporated therein by reference in order to ensure protection of human health and the environment.

1. FEDERAL FACILITY AGREEMENT

The Grantor acknowledges that the Umatilla Chemical Depot has been identified as a National Priorities List site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended. The Grantee acknowledges that the Grantor has provided it with a copy of the Umatilla Chemical Depot Federal Facility Agreement (FFA) dated September 19, 1989. For so long as the Property remains subject to the FFA, the Grantee, its successors and assigns, agree that they will not interfere with United States Department of the Army activities required by the FFA. In addition, should any conflict arise between the FFA and any amendment thereto and the deed provisions, the FFA provisions will take precedence. The Grantor assumes no liability to the Grantee, its successors and assigns, should implementation of the FFA interfere with their use of the Property.

2. LAND USE RESTRICTIONS

A. The United States Department of the Army has undertaken careful environmental study of the Property and concluded that the land use restrictions set forth below are required to ensure protection of human health and the environment. The Grantee, its successors or assigns, shall not undertake nor allow any activity on or use of the property that would violate the land use restrictions contained herein.

(1) Residential and Agricultural Use Restriction. The Grantee, for itself, its successors and assigns agrees that it shall not use the areas known as the J-Block Igloos, the Building 115 Area, the Building 203 Area, and the UMCDF, as shown and described in Enclosure 1 Map 3 Exhibit B, the Closed Active Landfill OU, as shown and described in Enclosure 1 Map 3 Exhibit C (see also Paragraph 2(4) of this Section 2), the EWL-GW OU, as shown and described in Enclosure 1 Map 3 Exhibit F, and the Deactivation Furnace OU, as shown and described in Enclosure 1 Map 3 Exhibit E for the following purposes:

1. Residential use of any type;
2. Agricultural use of any type;
3. Child care facilities and recreational uses where children may be present, including playgrounds; and nursing home or assisted living facilities; and
4. Educational facilities for children/young adults in grades kindergarten through 12.

(2) Groundwater Restriction. Grantee is hereby informed and acknowledges that:

a. The groundwater underlying the EWL Groundwater Pump and Treat Area, as shown in Enclosure 1 Map 3 Exhibit F, contains the contaminant Hexahydro-1,3,5-trinitro-1,3,5,-triazine (RDX), which is actively undergoing a pump and treat groundwater remedy; and

b. The groundwater underlying the Closed Active Landfill OU, as shown and described in Enclosure 1 Map 3 Exhibit C, contains nitrates and selenium.

Accordingly, neither withdrawal of groundwater nor any activity that may interfere with the groundwater remedy, is allowed within the EWL Ground Water Pump and Treat Area or the closed Active Landfill OU, shown and described in Enclosure 1 Map 3 Exhibit F and Enclosure 1 Map 3 Exhibit C, respectively, without prior written approval of the Army, EPA, and ODEQ. For the purpose of this restriction, "groundwater" shall have the same meaning as in section 101(12) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

(3) QA Function Range (aka Site 39) Land Use Restrictions. The Grantee is hereby informed and acknowledges that a Munitions And Explosives Of Concern (MEC) removal action appropriate for future agricultural use has been completed on this site, as shown and described in Enclosure 1 Map 3 Exhibit D. The Grantee, its successors and assigns, shall not use or permit others to use the 259-acre portion of Site 39 for any use other than agricultural and incidental residential, which includes a farm house, and barn and utility buildings, or limited recreational use (e.g., hiking and hunting).

(4) Closed Active Landfill OU Restrictions. The Grantee is hereby informed and acknowledges that the Property has a closed non-hazardous waste landfill ("Closed Active Landfill"). The Grantee, its successors and assigns, shall not conduct or permit others to conduct any excavation activities of any kind (i.e. digging, drilling, or any other excavation or disturbance of the land surface or subsurface) or other activities, which may damage the Closed Active Landfill OU Parcel cap, as shown and described in Enclosure 1 Map 3 Exhibit C.

B. Modifying Restrictions. Nothing contained herein shall preclude the Grantee, its successors or assigns, from undertaking, in accordance with applicable laws and regulations and without any cost to the Grantor, such additional action necessary to allow for other less restrictive use of the Property. Prior to such use of the Property, Grantee shall consult with and obtain the approval of the Department of the Army, the U.S. EPA Region 10, and the Oregon Department of Environmental Quality (ODEQ). Upon the Grantee's obtaining the approval of the Department of the Army, U.S. EPA Region 10 and ODEQ, the Grantor agrees to prepare and execute an instrument modifying or terminating, as appropriate, the land use restrictions set forth herein. This recordation of any such instrument in the county land records shall be the responsibility of the Grantee and accomplished at no additional cost to the Grantor.

C. Submissions. The Grantee, its successors and assigns, shall submit any requests to modifications to the above restrictions to the Department of the Army, U.S. EPA Region 10, and ODEQ by first class mail, postage prepaid, addressed as follows:

- a) Department of the Army
BRAC Field Branch Chief
G-9 DAIN-ISE
600 Army Pentagon, Washington DC 20310-0600 (Reg Mail)
NC3/Taylor Bldg/RM 1416
2530 Crystal Drive, Arlington VA 22202 (FedEx)

- b) U.S. Army Corps of Engineers Seattle District
4735 East Marginal Way South, BLDG 1202
Seattle, WA 98134-2388

- c) U.S. EPA Region 10
Harry Craig
EPA Region 10
805 SW Broadway Suite 500
Portland, OR 97205

- d) ODEQ
Pendleton Administrative Office
800 SE Emigrant Ave, Suite 330
Pendleton, OR 97801

NOTICE OF STATE LAND USE RESTRICTION

This Property is subject to an Easement and Equitable Servitude held by the Oregon Department of Environmental Quality pursuant to Oregon Revised Statutes, Volume 13, Title 36A, Chapters 465 and 466 Hazardous Waste and Hazardous Materials, to be recorded in the Office of the Umatilla County Clerk and in Office of the Morrow County Clerk.

3. NOTICE OF THE POTENTIAL PRESENCE OF MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

A. The Grantee is hereby notified that due to the former use of the Property as a military installation, the Property may contain munitions and explosives of concern (MEC). The term MEC means specific categories of military munitions that may pose unique explosives safety risks and includes: (1) Unexploded Ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (2) Discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (3) Munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.)

B. Site 39 in the northeastern corner of the Property was previously used as a rifle and pistol range and as a Quality Assurance (QA) testing area for flares, photoflash grenades, and mines. In October, 2008, a munitions response was conducted. Munition response activities included: clearance of MEC to a depth of two feet in the Rifle Range Area (107 acres) and in the Test Pad Area (68 acres), and to a depth of six feet in the Test Pit Area (1 acre). It included sifting the soil to a depth of two feet in the vicinity of three former QA function test pads, where a high density of

geophysical anomalies was found. Munitions response actions were completed in November 2008. Following the removal response actions, the Department of Defense Explosives Safety Board approved the response for no further action. Cleanup of Site 39 was based on future potential agricultural use and, therefore, only limited agricultural and recreational uses of the 259 acre site are allowed in accordance with paragraph 2.A.(3), above. The map depicting the location of munitions response site is provided and described in Enclosure 1 Map 3 Exhibit D.

C. The Grantor represents that, to the best of its knowledge, no MEC is currently present on Parcel 1. Notwithstanding the Grantor's determination, the parties acknowledge that there is a possibility that MEC may exist on the Property. If the Grantee, any subsequent owner, or any other person should find any MEC on the Property, they shall immediately stop any intrusive or ground-disturbing work in the area or in any adjacent areas and shall not attempt to disturb, remove or destroy it, but shall immediately notify the Umatilla County Sheriff at telephone number (541) 966-3600 so that appropriate explosive ordnance disposal personnel can be dispatched to address such MEC as required under applicable law and regulations.

D. Easement and Access Rights.

(1) The Grantor reserves a perpetual and assignable right of access on, over, and through the Property, to access and enter upon the Property in any case in which a munitions response action is found to be necessary, or such access and entrance is necessary to carry out a munitions response action on adjoining Property. Such easement and right of access includes, without limitation, the right to perform any additional investigation, sampling, testing, test-pitting, surface and subsurface clearance operations, or any other munitions response action necessary for the Grantor to meet its responsibilities under applicable laws and as provided for in this deed. This right of access shall be binding on the Grantee, its successors and assigns, and shall run with the land.

(2) In exercising this easement and right of access, the Grantor shall give the Grantee or the then record owner, reasonable notice of the intent to enter on the Property, except in emergency situations. Grantor shall use reasonable means, without significant additional cost to the Grantor, to avoid and/or minimize interference with the Grantee's and the Grantee's successors' and assigns' quiet enjoyment of the Property. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the property at a reasonable charge to the Grantor. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the grantee nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the Grantor.

(3) In exercising this easement and right of access, neither the Grantee nor its successors and assigns, as the case maybe, shall have any claim at law or equity against the Grantor or any officer, employee, agent, contractor of any tier, or servant of the Grantor based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this easement and right of access. In addition, the Grantee, its successors and assigns, shall not interfere with any munitions response action conducted by the Grantor on the Property.

E. The Grantee acknowledges receipt of the After Action Report (August 2009).

4. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT

A. The GRANTEE is warned that the Property contains friable and non-friable asbestos or asbestos-containing material (hereinafter referred to as "ACM"). Unprotected or unregulated exposures to asbestos in product manufacturing, shipyard, and building construction workplaces have been associated with asbestos-related diseases. Both the U.S. Occupational Safety and Health Administration (OSHA) and the U.S. Environmental Protection Agency (EPA) regulate asbestos because of the potential hazards associated with exposure to airborne asbestos fibers. Both OSHA and EPA have determined that such exposure increases the risk of asbestos-related diseases, which include certain cancers and which can result in disability or death.\

B. The GRANTEE acknowledges that it has been invited, urged, and cautioned to inspect the Property prior to accepting the conveyance herein. More particularly, the GRANTEE acknowledges that it has been invited, urged, and cautioned to inspect the Property as to its asbestos and ACM content and condition and any hazardous or environmental conditions relating thereto. Enclosure 9, attached hereto and made a part hereof, provides an asbestos assessment summary. Notwithstanding the foregoing notice, the GRANTEE shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property including, without limitation, any asbestos and ACM hazards or concerns.

C. Any description of the Property or other information relating to the condition of the Property provided by the GRANTOR to the GRANTEE is based on the best information available to the Department of the Army and is believed to be correct, but an error or omission, including, but not limited to, the omission of any information available to the agency having custody over the Property and/or any other Federal agency, shall not constitute grounds or reason for any claim by the GRANTEE against the GRANTOR, including, without limitation, any claim for allowance, refund, or deduction from the purchase price.

D. The GRANTOR assumes no liability for damages for personal injury, illness, disability, or death, to the GRANTEE, or to the GRANTEE's successors, assigns, employees, invitees, or any other person subject to GRANTEE's control or direction, or to any other person, including members of the general public, arising from or incident to the purchase, transportation, removal, handling, use, disposition, or other activity causing or leading to contact of any kind whatsoever with asbestos on the Property that is the subject of the conveyance herein, whether the GRANTEE, its successors or assigns has or have properly warned or failed properly to warn the individual(s) injured.

E. Buildings on the Property has been determined to contain friable and non-friable asbestos. The Grantee has covenants that these buildings are planned for demolition subsequent to the transfer. The GRANTEE covenants and agrees to undertake any and all asbestos removal in all buildings and structures on the Property that may be required under applicable law or regulation at no expense to the GRANTOR. The GRANTOR has agreed to convey the said buildings and structures to the GRANTEE prior to removal, remediation or abatement of asbestos and/or ACM

hazards in reliance upon the GRANTEE's express representation and covenant to perform the required asbestos removal in said buildings and structures and not allow occupancy of said buildings and structures on the Property prior to demolition or abatement. The GRANTEE further covenants and agrees that, in its use and occupancy of the Property, it will comply with all Federal, State, and local laws and regulations relating to asbestos and ACM and to be responsible for any future removal, remediation or abatement of asbestos and/or ACM, including asbestos and/or ACM in or on buried pipelines, found to be necessary under applicable laws or regulations.

5. NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP) AND COVENANT AGAINST THE USE OF THE PROPERTY FOR RESIDENTIAL PURPOSE

A. The Grantee is hereby informed and does acknowledge that all buildings on the Property, which were constructed or rehabilitated prior to 1978, are presumed to contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built prior to 1978 is notified that there is a risk of exposure to lead from lead-based paint that may place young children at risk of developing lead poisoning.

B. The Grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Property, as defined under 24 Code of Federal Regulations Part 35, without complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards. Prior to permitting the occupancy of the Property, and specifically those structures presumed to contain lead-based paint as Grantee acknowledges in paragraph A above, where its use subsequent to sale is intended for residential habitation, the Grantee specifically agrees to perform, at its sole expense, the Army's abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential Lead-Based Paint Hazard Reduction Act of 1992).

C. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its lead-based paint content and condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any lead-based paint hazards or concerns.

6. PESTICIDE NOTICE AND COVENANT

The Grantee is hereby notified and acknowledges that registered pesticides have been applied to the property conveyed herein and may continue to be present thereon. The Grantor and Grantee know of no use of any registered pesticide in a manner (1) inconsistent with its labeling or with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) (7 U.S.C. § 136, et seq.) and other applicable laws and regulations, or (2) not in accordance with its intended purpose.

The Grantee covenants and agrees that if the Grantee takes any action with regard to the property, including demolition of structures or any disturbance or removal of soil that may expose, or cause a release of, a threatened release of, or an exposure to, any such pesticide, Grantee assumes all responsibility and liability therefor.

Enclosure 9

ASBESTOS SURVEY RESULTS

Building Assessed	ACM Identified	Quantity	Condition/Friability	Accessibility
101	Roof Flashing	144 Linear feet (LF)	Good, minimal damage/non-friable.	Low – partial barrier, not within easy reach.
116	TSI – Boiler Insulation was sampled; non-detect for ACM	N/A	N/A	N/A
122, 123, 125, 126, 129	None	N/A	N/A	N/A
133	Duct vent insulation	4 LF	Good, minimal damage/non-friable.	Low - partial barrier, not within easy reach
135	None – Cement Asbestos Board (CAB) roof shingles removed and replaced with asphalt shingles.	N/A	N/A	N/A
139	CAB building siding (tiles)	640 SF	Good, /non-friable.	Moderate – area fenced off. Once in fenced area within reach.
Building Assessed	ACM Identified	Quantity	Condition/Friability	Accessibility
200	Caulking	300 LF	Good, no known damage/non-friable.	High – within easy reach.
201, 203, 204, 205	None identified. Caulking may exist under siding or within roof system.	N/A	N/A	N/A
202	Chrysotile was identified in transite board	300 SF	Non-friable	Behind fire suppression equipment

Building Assessed	ACM Identified	Quantity	Condition/Friability	Accessibility
	behind the fire suppression equipment during demolition in 2018.			
208	Fire door suspect to contain ACM	2	Good, no known damage/non-friable.	High – within easy reach.
403, 404, 405, 406, 409, 410, 411, and 414	Ceiling tar, tar paper and caulking over expansion joints.	Tar and tar paper 12,000 SF, caulking 250 LF per building	Good, no known damage/ non-friable.	Moderate – requires a ladder to reach ceiling. High for caulking.
431, 434	Flashing, CAB building siding, and CAB siding debris.	4,000 SF	CAB shingles are in good condition, but some have fallen onto the ground. Non-friable	High – within reach.
433	CAB siding, CAB siding debris. TSI on boiler and associated piping has been removed.	2,000 SF	CAB siding is in good condition. Non-friable	High – within reach.
421, 423, 424, and 425	CAB roof shingles	927 SF per building	CAB shingles are in good condition. Non-friable	Moderate – requires a lift to access shingles on roof.

ENCLOSURE 10

LEAD-BASED PAINT SAMPLE RESULTS

Building/ Unit/ Room	Component	Number of samples exceeding 1.0 (mg/cm ²)	Highest recorded lead value	Comment
101/Exterior, Loading Dock – 1, Storage – 1	Various	16	>5.09 mg/cm ²	
116/Exterior, Loading Dock – 1, Stairway – 2, Stairway – 3	Various	23	>5.09 mg/cm ²	
122/Exterior	Various	56	>5.09 mg/cm ²	
123/Exterior, Loading Dock – 2	Various	73	>5.09 mg/cm ²	
125/Exterior, Loading Dock – 2	Various	73	>5.09 mg/cm ²	
126/Exterior, Loading Dock – 1	Various	31	>5.09 mg/cm ²	
129/Exterior, Loading Dock – 1	Various	8	>5.09 mg/cm ²	
133/Exterior	Various	14	>5.09 mg/cm ²	
135/Exterior	Various	8	4.63 mg/cm ²	
139/Exterior	Various	9	>5.09 mg/cm ²	QC sample taken.
160/Exterior	Various	5	3.49 mg/cm ²	
161/Exterior	Various	4	2.97 mg/cm ²	
200/Exterior	Various	2	>5.09 mg/cm ²	
201/Exterior	Trim	1	>5.09 mg/cm ²	QC sample taken. Gutter board.
202/Exterior	Various	2	3.51 mg/cm ²	

Building/ Unit/ Room	Component	Number of samples exceeding 1.0 (mg/cm²)	Highest recorded lead value	Comment
204/Exterior	Various	2	>5.09 mg/cm ²	
205/Exterior, Storage – 1	Various	4	>5.09 mg/cm ²	
208/Exterior	Various	4	3.56 mg/cm ²	
421/Exterior	Various	4	>5.09 mg/cm ²	
423/Exterior	Various	2	>5.09 mg/cm ²	
424/Exterior	Various	3	>5.09 mg/cm ²	
425/Exterior	Various	7	>5.09 mg/cm ²	
431/Exterior	Various	4	>5.09 mg/cm ²	
433/Dressing Room – 2, Exterior	Various	4	>5.09 mg/cm ²	
434/Exterior	Various	3	>5.09 mg/cm ²	
442/Storage – 1	Door Molding	1	3.93 mg/cm ²	
803/Loading Dock – 1, Ramp – 1	Various	2	>5.09 mg/cm ²	Concrete edge & 6- inch striping paint; All ramp components same yellow.
808/ Exterior, Loading Dock – 1, Ramp – 2	Various	4	>5.09 mg/cm ²	
809/Exterior	Siding	1	3.57 mg/cm ²	
810/Exterior, Loading Dock-1, Ramp – 1	Various	4	>5.09 mg/cm ²	

Building/ Unit/ Room	Component	Number of samples exceeding 1.0 (mg/cm²)	Highest recorded lead value	Comment
811/Exterior	Siding	1	2.77 mg/cm ²	
812/Exterior, Ramp - 1	Various	2	4.04 mg/cm ²	
813/Loading Dock - 1, Stairway - 1	Various	2	>5.09 mg/cm ²	
814/Loading Dock - 1, Stairway - 1	Various	2	>5.09 mg/cm ²	
817/Loading Dock - 1, Ramp - 2	Loading Dock Bumper	3	1.72 mg/cm ²	
818/Exterior, Loading Dock-1, Ramp - 1, Stairway - 1	Various	15	3.79 mg/cm ²	
819/Exterior, Loading Dock - 1, Ramp - 1, Stairway - 1	Various	9	>5.09 mg/cm ²	QC sample taken.
820/Exterior, Ramp - 1	Various	5	>5.09 mg/cm ²	
823/Exterior, Stairway - 1	Various	2	>5.09 mg/cm ²	

*Source: *Hart Crowser, 1996.*

**ENCLOSURE 11
REGULATORY/PUBLIC COMMENTS**

2/8/2022

EPA COMMENTS ON THE UMATILLA DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER (FOST), UMATILLA CHEMICAL DEPOT, OREGON, COLUMBIA DEVELOPMENT AUTHORITY, PARCEL 1, DATED XXXX 2022

I. GENERAL COMMENTS

1. EPA has completed review of the Umatilla draft final Finding of Suitability to Transfer (FOST) dated XXXX 2022. This review was conducted to assess the technical and legal adequacy of the document for land transfer under the provisions of CERCLA Section 120.
2. One of the major omissions of the draft final FOST was the Army's failure to address emerging contaminants such as Per-and-Polyfluorinated Alkylated Substances (PFAS). EPA has identified PFAS as a high priority for site investigation where background information suggests potential sources were used or disposed of on DOD military installations, including BRAC sites. PFAS compounds are used in a number of products and identified sources are: 1) fire training areas utilizing Aqueous Film Forming Foams (AFFF), 2) landfill leachates, 3) metal plating operations, 4) sewage sludges, and 5) munitions OB/OD disposal sites.
3. Several of these potential sources exist on the Umatilla Army Depot, and to date the Army has not investigated environmental releases of PFAS into soil and groundwater from potential source areas. These potential source areas include: 1) the closed Active Landfill OU, 2) sewage sludge drying beds, 3) Ammunition Demolition Area (ADA) munitions OB/OD unit OU, and 4) fire training areas and burn pits identified by the Army National Guard Bureau PFAS Preliminary Assessment. Several of these source areas are on the Columbia Development Authority (CDA) transfer property such as the closed Active Landfill OU, or in very close proximity to the CDA property such as the ANGB fire training areas/burn pits, which are within 200 to 400 feet of the boundary between the ANGB and CDA property boundary (ANGB 2020, Fig 2-1).
4. Given these existing data gaps, the Army must acknowledge to the transferee that the Army remains responsible under CERCLA Section 120 for contamination after the transfer (unless the grantee caused the contamination); the Army must inform the transferee about the potential PFAS areas. EPA recommends that the Army conduct PFAS sampling as expeditiously as possible to address these remaining data gaps. EPA identified the outstanding PFAS data gaps to the Army in our comments on the Fifth Five Year Review in 2020 and follow up letter in 2021.

II. SPECIFIC COMMENTS

1. EPA's specific comments on the sections of the draft final FOST are including in the attached Word version of the draft final FOST, EPA technical and legal comments are included in the margins.

III. REFERENCES

1. EPA PFAS Guidance, https://www.epa.gov/sites/default/files/2019-12/documents/epas_interim_recomendations_for_addressing_groundwater_contaminated_with_pfoa_and_pfos_dec_2019.pdf
2. Army PFAS Guidance 2018, <https://denix.osd.mil/dod-pfas/army-policies/text/guidance-for-pfas/>
3. Army PFAS Policy 2021, <https://denix.osd.mil/dod-pfas/army-policies/text/army-pfas-policy/>
4. EPA CERCLA Fifth Five Year Review, Umatilla Army Depot, Hermiston, Oregon, letter dated 9/25/2020 signed by Calvin Terada.
5. EPA Umatilla Army Depot Federal Facility, Hermiston, Oregon, letter dated 2/16/2021 signed by Calvin Terada.
6. FINAL Preliminary Assessment Report, Camp Umatilla, Hermiston, Oregon, Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites, Prepared for: Army NGB and USACE, Baltimore District, prepared by: AECOM, Germantown, MD, dated May 2020.

ENCLOSURE 12
ARMY RESPONSE TO COMMENTS

Comment Number/Location	Comment	Response
EPA letter, para 2, 3, 4	Inform the transferee of the potential PFAS areas.	The Army is currently conducting a PFAS Preliminary Assessment (PA) to determine if there are likely areas that could have resulted in a PFAS release. We will continue to follow the CERCLA investigative and cleanup process as necessary. We have protections of human health and the environment at potential PFAS AOC's as there are existing GW restrictions for the use of GW at the washout lagoon GW and the GW in the vicinity of the landfill, in prior monitoring of the landfill no GW issues were identified. We have specifically been sampling for PFAS to ensure our drinking water is safe, to date drinking water samples have not identified any PFAS in drinking water.
EPA cmt 1, pg 1, para 1	Inserted "determination by the United States Department of the Army (Army) of the " in the first line.	Not accepted. This is model language provided by DoD, clarification on an Army signature document only is unnecessary.
EPA cmt 2, pg 1, para 1	6th line changed " the to this"	Accept the change
EPA cmt 3, pg 1, para 4	5th line, changed "the to this', inserted the property after parcel 1, inserted "or address" after evaluate. The change of parcel 1 to the "Property" was a change they made throughout the FOST, we have accepted all of those changes.	Accept the change
EPA cmt, 4, pg 1, para 4	5th line inserted "or address" after evaluate.	Accept the change
EPA cmt 5, pg 1, para 4	added "The" before Army.	Accept the change
EPA cmt 6, pg 2, para 1	4th line spelled out ODOT, changed FOST to property.	Accept the change

Comment Number/Location	Comment	Response
EPA cmt 7, pg 2, para 2	3rd line, spelled out CWM	Accept the change
EPA cmt 8, pg 2, 4th para	4th line spelled out DOD	Accept the change
EPA cmt 9, pg 2, 4th para	5th line changed "FOST to property"	Accept the change
EPA cmt 10, pg 2 4th para	Changed Parcel 1 to the property	Accept the change
EPA cmt 11, pg 3, 1st para	25th line changed agency to Army	Not accepted, more than Army files were searched.
EPA cmt 12, pg 3, 2nd para	1st line spelled out ECP	Accept the change
EPA cmt 13, pg 4, 1st para	1st line deleted "Department of Defense", left the acronym DOD	Accept the change
EPA cmt 14, pg 4 2nd para	1st line inserted "storage"	Not accepted, changes the definition of ECP category 1 property. The Army provides this certification by providing a notice in the FOST as well as the deed. Section 331 of the 1997 NDAA amended 120(h)(4) to remove "stored for one year or more, known to have been released" and the definition of property categories is found in ASTM D5746-98(2016).
EPA cmt 15, pg 4, 2nd para	2nd line, inserted "pollutants and contaminates"	Not accepted, changes the definition of ECP category 1 property. The Army provides any known information on pollutants and contaminates in paragraph 4. The statutory requirement/language in Section 120(h)(4) for uncontaminated property - Category 1 - does not include pollutants and/or contaminants.
EPA cmt 16, pg 4, 2nd para	3rd line, "deleted CDA and inserted 1 after parcel".	Accept the change.
EPA cmt 17, pg 4 4th para	1st line inserted "storage"	Not accepted, changes the definition of ECP category 3 property. The Army provides this certification by providing

Comment Number/Location	Comment	Response
		a notice in the FOST as well as the deed. "Storage" and "pollutants or contaminants" are not included in the definition of a Category 3 site.
EPA cmt 18, pg 4 4th para	2nd line, inserted "pollutants and contaminates"	Not accepted, changes the definition of ECP category 3 property. The Army provides any known information on pollutants and contaminates in paragraph 4.
EPA cmt 19, pg 5, 1st para	1st line inserted "storage"	Not accepted, changes the definition of ECP category 4 property. The Army provides this certification by providing a notice in the FOST as well as the deed.
EPA cmt 20, pg 5, 1st para	2nd line, inserted "pollutants and contaminates"	Not accepted, changes the definition of ECP category 4 property. The Army provides any known information on pollutants and contaminates in paragraph 4.
EPA cmt 21, pg 5, 3rd para	5th line inserted "allowances" after use, changed "was to are".	Accept the changes.
EPA cmt 22, pg 5 4th para	2nd line changed "response to remedial".	Accept the change.
EPA cmt 23, pg 5 4th para	5th line deleted "were defined" and inserted "required in accordance with the applicable"	Accept the change.
EPA cmt 24, pg 5 4th para	6th line, inserted "are or after LUCs"	Accept the change.
EPA cmt 25, pg 5 4th para	9th line, inserted "of the Property to CDA"	Accept the change.
EPA cmt 26, pg 6, table 4 2nd row	Deleted "further removal and NFA". Added this comment "Under the NCP, cite "no-further action" when prior response action has occurred in the reference area and "no-action" when no previous response action was taken in the area". EPA made this comment throughout the table.	Made this change throughout the table.
EPA cmt 27, pg 7 2nd row	EPA comment, "LUCs are necessary consistent with the 2020 ESD".	Insert language, LUCs were implement as required in the 2020 ESD.

Comment Number/Location	Comment	Response
EPA cmt 28, pg 7 3rd row	EPA wants OPS spelled out	Spelled out OPS, operating properly and successfully.
EPA cmt 29, pg 7 row 5	EPA comment, "EPA recommended that the Army evaluate this site for PFAS since this pollutant or contaminant is often associated with landfills. The Army should explain why it does not associate PFAS with the landfill."	The Army is currently conducting a PFAS Preliminary Assessment (PA) to determine if there are likely areas that could have resulted in a PFAS release. We will continue to follow the CERCLA investigative and cleanup process as necessary. We have protections of human health and the environment at potential PFAS AOCs as there are existing GW restrictions for the use of GW in the vicinity of the landfill, in prior monitoring of the landfill no GW issues were identified. We have specifically been sampling for PFAS to ensure our drinking water is safe, to date drinking water samples have not identified any PFAS in drinking water.
EPA cmt 30, pg 7 row 5	EPA comment, "what is the status of the work for this site?"	The landfill has been closed IAW the Oregon permit, LUCs were implemented IAW the closure plan.
EPA cmt 31, pg 7 row 5	EPA comment "LUCs are necessary consistent with the 2020 ESD"	Insert the following language, the landfill has been closed IAW the Oregon permit, LUCs were implemented IAW 2020 ESD.
EPA cmt 32, pg 11 3rd para	2nd line, EPA comment, "what is the basis for the 10 ppm cut-off and were any transformers found to contain PCBs at detection levels up to 9 ppm? If so, what was done about these PCBs"?	Although transformers with less than 50 ppm PCBs are considered non-PCB transformers, the report notes that maintaining transformers with less than 10 ppm PCBs is advantageous (e.g. spills of dielectric fluid with PCB concentrations <10 ppm are not likely to contaminate soil above the 10 ppm PCB cleanup level for soil) (Dames and Moore 1993c). The 1989 transformer inventory and inspection used the 10ppm cut-off based on the soil cleanup standard under TSCA. Although transformers with less than 50ppm PCBs are considered non-PCB transformers, the inspection noted that maintaining transformers with less than 10ppm PCBs was a better best management practice."
EPA cmt 33, pg 11 3rd para	4th line EPA Comment, "Did the Army do an inspection for transformers, capacitors,	Yes, this was documented in the 1993c Dames and Moore Supplementary Remedial Investigation and summarized in

Comment Number/Location	Comment	Response
	ballasts and other potential PCB-containing equipment? Especially older equipment (pre-1976) from before PCBs were no longer allowed in electrical equipment? Also, did the Army do an evaluation of PCBs in paint or caulk from the pre-1976 era"?	the 2013 ECP. The report provides information on the transformers, such as sampling, locations, maps, PCB concentrations, in use, etc. In accordance with DoD 4165.66-M, the Army must review all appropriate electrical equipment on the installation to ensure that they are appropriately classified as PCB, PCB-contaminated, or non-PCB (40 CFR 761.30).
EPA cmt 34, pg 11 4th para	6th line EPA comment, "explain how this is an acceptable standard for ruling out potential releases of asbestos."	Delete " fair ". A re-inspection was conducted as part of updating the Umatilla Asbestos Assessment in 2021. No regulated asbestos-containing material was identified (RACM). However, it is possible that asbestos is present in inaccessible areas (such as, inside igloo doors or around pipes inside walls). Asbestos is also present in accessible areas, but in binders such as cement or caulking. ACM will not present an unacceptable risk to human health, as the asbestos is either contained within a binding agent or is inaccessible."
EPA cmt 35, pg 12, 1st para	5th line EPA Comment on ACM "How does this approach comport with the CERCLA 120(h)(3)(ii)(II) requirement holding the Army responsible for any additional remedial action found to be necessary after the date of transfer"?	In accordance with DoD policy as set forth in an Office of USD (AT&L) memorandum dated October 31, 1994. Prior to property disposal, all available information on the existence, extent, and condition of ACM shall be incorporated into the Environmental Condition Property report. OSD policy directs that ACM not in compliance with applicable laws, regulations, and standards or that poses a threat to human health at the time of transfer shall be remediated by the Military Department, or by the transferee under a negotiated requirement of the contract for sale or lease. However, remediation of ACM that poses a threat to human health will not be required when the buildings are scheduled for demolition by the transferee; the transfer document prohibits occupation of the buildings prior to demolition; and the transferee assumes responsibility for the

Comment Number/Location	Comment	Response
		<p>management of any ACM in accordance with applicable laws. The Army is not attempting to transfer CERCLA liability for ACM through the deed. Instead, the Army is using a transparent, recorded mechanism to up the transferee and others on notice of existing environmental conditions with a commitment from them to manage ACM in accordance with applicable laws and regulations. ACM and LBP are common building conditions and their presence within or on a building does not constitute a hazardous substance release to the environment; nor is the simple presence of ACM in or on a building a threat of a hazardous substance release to the environment.</p>
EPA cmt 36, pg 12, 3rd para	1st line EPA comment, Will this be a prohibition that is captured in an Easement and Equitable Servitude?	yes
EPA cmt 37, pg 12, 3rd para	3rd line EPA comment, How will the Army maintain its responsibility under CERCLA 120(h)(3)(ii)(II) to address any additional remedial action which may be necessary for lead from this source?	<p>In response to the Lead-Based Paint Poisoning Prevention Act (reference (q)) and Residential Lead-Based Paint Hazard Reduction Act (Title X) (reference (bn)), DoD policy is set forth in the Office of the USD (AT&L) memorandum of January 7, 2000 (reference (bo)), and Lead-Based Paint Guidelines for Disposal of DoD Residential Real Property: A Field Guide (Interim Final-December 1999) (reference (bp)). That policy calls for DoD Components to manage lead-based paint (LBP) in a manner protective of human health and the environment, and to comply with all applicable Federal, State, and local laws and regulations governing LBP hazards. The Federal requirements for residential structures and dwellings with LBP on BRAC properties differ depending on the date of construction of the residential housing being transferred. These requirements may include inspection, notice, and abatement. However, inspection and abatement are not</p>

Comment Number/Location	Comment	Response
		required when the building is scheduled for demolition, non-residential use, or non-child-occupied facilities, or when the transferee conducts renovation consistent with regulatory requirements for abatement of LBP hazards. See response above, too.
EPA cmt 38, pg 12, 6th para	EPA comment "Need to address potential sources of PFAS for 1) AFFF fire training areas, 2) landfills, 3) sewage sludge lagoons, and 4) MEC OB/OD disposal areas".	The Army is currently conducting a PFAS PA to determine if there are likely areas that could have resulted in a PFAS release. We will continue to follow the CERCLA investigative and cleanup process as necessary. The FOST EPPs articulate the Army's responsibilities under CERCLA if PFAS is determined to be present. We have protections of human health and the environment as there are existing GW restrictions for the washout lagoon GW and the GW in the vicinity of the landfill. There is no confirmed PFAS release on the property, there is no requirement to include a notice for the potential release of a pollutant or contaminant.
EPA cmt 39, pg 13, 3rd para	3rd line, "spelled out MFR"	Accept the change.
EPA cmt 40, pg 13, 5th para	First line inserted "to Parcel 1" at the end of the line.	Accept the change
EPA cmt 41, pg 13 5th para	2nd line EPA comment, Other metals contaminants besides lead were also detected in the ADA OU soils.	re wrote the first part of the sentence, In addition to MEC, the ADA, (Enclosure 1, Map 2) was investigated for contaminates of concern (COC) in soils that may pose a threat to human health or the environment.
EPA cmt 42, pg 13 5th para	last line added "at the ADA" at the end of the line.	Accept the change.
EPA cmt 43, pg 14, 2nd para	4th deleted "FFA" and inserted "CERCLA".	Not accepted, this section is specific to environmental remediation agreements.
EPA cmt 44, pg 14, 2nd para	3rd line, added "additional" and "if those should prove necessary".	Accept the change.

Comment Number/Location	Comment	Response
EPA cmt 45, pg 14, 3rd paragraph	1st and second line, spelled out EPA and ODEQ.	Accept the change.
EPA cmt 46, pg 14 3rd para	4th line, inserted "to those comments"	Accept the change.
EPA cmt 47, E3-1	Enclosure 3, EPA comment, "whenever there is an indication of remedial action complete or no-father action or no-action, there should be a brief explanation describing the condition of the property (i.e. all hazardous substances have been removed, some hazardous substances remain in ____ but at acceptable exposure levels, or some hazardous substances remain in _____ such that abiding by ICs/LUCs will protect against exposures. and when no-action is the determination, there should also be a brief supporting explanation (i.e. no hazardous substances discovered in this area, or hazardous substances present in ____ but at acceptable exposure levels, or hazardous substance present in _____ such that abiding by ICs/LUCs will provide acceptable protection)".	Not accepted, this is a notification table for property transfer purposes and does not need to duplicate the information that is found elsewhere.
EPA cmt 48, E3-1, 3rd row	EPA comment "LUCs need to continue based on the 2020 ESD".	add, "LUCs were implemented per the 2020 ESD".
EPA cmt 49, E3-4 4th row	Last line added the "groundwater in this portion of " and "to restrict groundwater extraction and use" at the end of the line.	Accept the addition
EPA cmt 50, E3-6 1st row	Added "to restrict potential exposure to landfill waste".	Accept the addition
EPA cmt 51, E3-6 2nd row	Added "to prevent exposure to remaining contamination" add the end of the last line.	Accept the addition.

Comment Number/Location	Comment	Response
EPA cmt 52, E3-6, 3rd row	EPA comment, what cleanup was done here and what remains	added the following additional information. Soil remediation was completed in 1997 with NFA required.
EPA cmt 53, E3-7	This page has the definitions for the ECP categories. EPA has again insert words such as storage and pollutants and contaminates that is not consistent with the standard definitions.	Not accepted, the insertions "Storage" and "pollutants or contaminants" are not included in the definition for ECP categories.
EPA cmt 54, E4-1, 1st row	Encl 4 table 2 ,EPA wants a description of the LUCs and the reasons why they were put in place. EPA wants this explained throughout the table.	Provided a description of the LUCs and the reason why they were put in place throughout the table.
EPA cmt 55, E5-1 2nd row	added a comment" because (explain what has become of the PCB's	added the following text, PCBs were not present and remediation of other contaminates was not required because contamination was at acceptable exposure levels.
EPA cmt 56, E5-5 3rd row	EPA comment, "what about pollutants or contaminants".	Not accepted, this follows the definitions in use which is only for hazardous substances or petroleum products.
EPA cmt 57, E5-6 1st row	EPA added a comment about the word inactive, "is the tank gone or still there? if it is still there, what are the current contents"?	Added the tank was removed.
EPA cmt 58, E7-2 last paragraph	EPA comment, "what about claims under CERCLA for costs or damages or injunctive relief in the Army fails to take proper remedial action"?	Reject deletion of "remaining" on page E7-2 in first line. The provision about a claim pertains only to the Army's access rights to respond to a post-transfer discovery of contamination or requirement for additional remediation. The deed does not discuss liability for non-action against the Army and does not preclude CERCLA claims for such non-action.
EPA cmt 59, E7-3 1st para	3rd line, EPA comment, "what about the CERCLA requirements for providing a warranty and covenants in 120(h)(3)(A) and (B)"?	This is standard language found in all DoD/US Government deeds.
EPA cmt 60, E7-3 2nd para	EPA comment on the 1st line, see comment above	See above

Comment Number/Location	Comment	Response
EPA cmt 61, E7 3, 3rd para	EPA comment on the entire paragraph, "but is seems contradictory"	See above
EPA cmt 62, E7 3 4th para	EPA comment on the 6th line, "see comment above about ongoing obligation of the Army to remediate the Property if necessary".	The property is being transferred in a transparent manner, alerting Grantee and all future owners of potential building material concerns that will require compliance with regulations and standards, these are not threatened releases to the environment of hazardous substances.
EPA cmt 63, E7 -3 5th para	EPA comment on the last three lines, "how is the U.S. not responsible for the costs associated with addressing hazardous substances at the Property which were there when the transfer occurred"?	Costs associated with a known environmental condition which have not been released into the environment at the time of transfer does not trigger a CERCLA liability.
EPA cmt 64, E7-3, last para	1st line, inserted "pollutant or contaminant"	Not accepted, while the Army is making a policy decision to respond to pollutants and contaminants, such as PFAS, found after transfer, the statutory language is only for hazardous substances.
EPA cmt 65, E7-4 1st and 2nd paras	inserted "pollutant and contaminate" after hazardous substance throughout the paragraphs.	See above.
EPA cmt 66, E8-1	2nd line added "and will prohibit others from using" after use.	Not accepted.
EPA cmt, 67, E8-2 2nd para	added 42 USC 9601 (12) at the end of the last line.	Accept the change.
EPA cmt 68, E8-2, 4th para	EPA comment, What liners are being referred to?	Changed liner to Cap. Cap consists of soil, liner, then top soil.
EPA cmt 69, E8-2 5th para	4th line, inserted "prohibitions on" before use of the property and inserted "modifications on" before use of the property.	Accept the change
EPA cmt 70, E8-4 2nd para	EPA comment on the last line on the word regulations, "and what about adding contact the Army for a possible response?"	The Army provides the local contact information to make it easier to reach a government official. The local Sheriff's office knows how to contact the appropriate EOD personnel.

Comment Number/Location	Comment	Response
EPA cmt 71, E8-4 3rd para	EPA comment on 2nd line concerning munitions response, "shouldn't this also include a response to other hazardous substances, pollutants or contaminants?"	Response to comments on E8-4. This notice is specific to MEC. The access provision in Enclosure 7.D. covers all other substances.
EPA cmt 72, E8-5 2nd para	EPA comment, 3rd line on the words or remediation, "isn't this the responsibility of the Army under CERCLA 120(h)(3)(A)(ii)(II)"?	Response to comments on E8-5. No, the Army may transfer ACM material in a building without triggering a CERCLA liability issue because it is not a hazardous substance that has been released into the environment. Note - this ACM Notice has been modified to use the standard GSA notice found in the CFR.
EPA cmt 73, E8-6 1st para	EPA comment on the 2nd line, on the words "the grantee specifically agrees to perform at its sole expense the Army's abatement requirements, "what about the Army's responsibility under CERCLA 120(h)(3)(A)(ii)(II)?"	Comment on LBP. See above.
EPA cmt 74, E8-6 4th para	EPA comment on the last line on the words, Grantee assumes all responsibility and liability therefor, "the grantee may take action which results in a release - but the Army put that potential hazardous substance on the property - so how is it not partly the Army's responsibility and what about LUCs?"	Comment on Pesticide Notice. The Army is not attempting to transfer CERCLA liability for pesticides. The pesticide notice and covenant is a transparent, recorded mechanism to put the transferee and others on notice of an existing environmental condition with a commitment from them to manage the applied pesticides in accordance with applicable laws and regulations. CERCLA Sec. 107(i) exempts liability where application of registered pesticides occurs in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 2011 et. seq.) and label instructions. At the time of transfer, Army is not liable under CERCLA Sec. 107(a) for its proper application of pesticides during its ownership of the property and, therefore, the pesticide notice and covenant is not an attempt to transfer liability. Instead, the Army is providing a transparent notice that registered pesticides were applied properly on the

Comment Number/Location	Comment	Response
		property and receiving the transferee's covenant to handle soils in a responsible manner to avoid or address any potential future CERCLA liability during redevelopment.