



NATIONAL GUARD BUREAU
3500 FETCHET AVENUE
JOINT BASE ANDREWS AFB MD 20762-5157

24 May 2021

TECHNICAL MEMORANDUM

FROM: NGB/A4VR

SUBJECT: Site Inspection Phase Closeout at Martin State Air National Guard Base, Maryland

References: (a) DoDM 4715.20, 9 March 2012, *Defense Environmental Restoration Program (DERP) Management*.
(b) BB&E, Inc. (BB&E), January 2016, *Final Perfluorinated Compounds Preliminary Assessment Site Visit Report, Martin State Air National Guard, Baltimore, Maryland*.
(c) Amec Foster Wheeler, February 2019, *FY16 Phase I Regional Site Inspections for Per-Fluorinated Compounds at Martin State Air National Guard Base, Baltimore, Maryland*.

1. The Air National Guard (ANG) conducts environmental restoration activities of per- and polyfluoroalkyl substances (PFAS) in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and may also conduct activities in accordance with the Resource Conservation and Recovery Act (RCRA), and other applicable Federal, State, interstate, and local requirements, where appropriate.
2. The Department of Defense (DoD) Defense Environmental Restoration Program (DERP) Management manual (Reference a), set forth the procedures that the ANG must follow when conducting restoration activities. When concluding the Preliminary Assessment (PA)/Site Inspection (SI) phase of the CERCLA process, the ANG must formally document a determination for each site, as provided in Enclosure 3, Section 4b(2)(b) of Reference a. The potential options are as follows: 1) No need for action; 2) Need for a removal action, but not a remedial action; or, 3) Need for Remedial Investigation (RI)/Feasibility Study (FS). This Technical Memorandum documents the ANG's determination related to the PFAS PA/SI at Martin State Air National Guard Base (ANGB), Maryland.
3. The January 2016 Martin State ANGB PA (Reference b) included a review of thirteen documented fire training and other areas suspected or known to have had a release of Aqueous Film Forming Foam (AFFF), a source of PFAS, into the environment. Of the thirteen Potential Release Locations (PRLs) evaluated in the PA, sufficient evidence of a potential release warranting additional investigation was found at eleven of the PRLs: PRLs 1 through 3 and PRLs 6 through 13. The PA concluded that there was insufficient evidence of a potential release warranting additional investigation at two of the PRLs: PRL 4 and PRL 5. See Table 1 for summary.

4. The February 2019 Martin State ANGB SI evaluated the eleven PRLs that were carried forward from the PA (Reference c). Laboratory sampling results from the SI confirmed the release of PFAS in environmental media above screening levels at ten PRLs: PRLs 1 through 3, PRLs 6 through 9, and PRLs 11 through 13. Laboratory sampling results from the SI did not confirm the release of PFAS in environmental media above screening levels at PRL 10. The SI concluded that there was insufficient evidence of a potential complete exposure pathway from confirmed PFAS release areas above screening levels to human drinking water receptors.

5. Determination: The ANG is to proceed with a RI/FS at Martin State in order to define the nature and extent of PFAS impacts at the ten PRLs where PFAS was detected in environmental media above screening levels during the SI: PRLs 1 through 3, PRLs 6 through 9, and PRLs 11 through 13. No further action is required at PRLs 4 and 5 since no AFFF releases were identified during the PA. No further action is required at PRL 10 since a PFAS release in environmental media above screening levels was not confirmed during the SI. Data collected during the RI/FS may identify the need for a removal action or remedial action at a later date.

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Chief, ANG Restoration Branch

Attachments:

1. Table 1 - PFAS Summary, Martin State ANGB, Maryland

ATTACHMENT 1

Table 1. Per- And Polyfluoroalkyl Substances (PFAS) Summary, Martin State ANGB, Maryland

Potential Release Location (PRL)		Preliminary Assessment (PA)		Site Inspection (SI)	
I.D.	Description	Conclusion	Determination	Conclusion	Determination
1	IRP 9 Fire Training Area (FTA)	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with Remedial Investigation/ Feasibility Study (RI/FS)
2	IRP 10 (FTA)	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS
3	Fire Station (Building 3150)	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS
4	Base Hazardous Storage (Building 5040)	Insufficient evidence of a potential PFAS release warranting additional investigation	No further action	Not evaluated during SI	No further action
5	Motor Pool/Vehicle Maintenance (Building 2110)	Insufficient evidence of a potential PFAS release warranting additional investigation	No further action	Not evaluated during SI	No further action
6	Former Building 1040	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS

Potential Release Location (PRL)		Preliminary Assessment (PA)		Site Inspection (SI)	
I.D.	Description	Conclusion	Determination	Conclusion	Determination
7	Former Fire Station (Building 1050)	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS
8	A-10 Maintenance Hangar (Building 1070)	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS
9	Petroleum, Oil, Lubricants (POL) Storage	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS
10	Nozzle Training Area	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was not confirmed	No further action
11	Stormwater Outfall 1	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS
12	Stormwater Outfall 2	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS
13	Stormwater Outfall 3	Found sufficient evidence of a potential PFAS release warranting additional investigation	Proceed with SI	Release of PFAS in environmental media above screening levels was confirmed	Proceed with RI/FS