



October 25, 2002

Mr. Howard Peak, Chairman
Board of Directors
Brooks Development Authority
8030 Challenger Drive
Brooks AFB, TX 78235-5145

Dear Mr. Peak:

The Texas Commission on Environmental Quality (TCEQ) and United States Environmental Protection Agency (EPA) Region 6 together have made a technical determination that Brooks City-Base (formerly Brooks Air Force Base, Texas) is "Ready for Reuse." A "Ready for Reuse Determination" is an acknowledgment that environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use as a technology and business park.

Brooks City-Base is located 6 miles southeast of downtown San Antonio in Bexar County, Texas and encompasses 1,308.6 acres (the "Property"). Historically, Brooks Air Force Base has served as a Department of Defense (DoD) aerospace medical research facility. Brooks was initially established in 1917 as a flight instructor training facility. By the late-1950s, the facility had transitioned to function as a modern medical research, development and educational facility. On July 22, 2002, Brooks Air Force Base was officially conveyed to the Brooks Development Authority via a deed (the "Deed") as part of the Brooks City-Base Project authorized by Public Law 106-246. The facility was formally renamed Brooks City-Base on that date.

DoD policy requires the preparation of an environmental baseline survey (EBS) to document the environmental conditions of real property resulting from the storage, release, and disposal of hazardous substances and petroleum products and their derivatives over the installation's history. The EBS also served as the basis for the Base Environmental Suitability for Transfer (BEST) Determination. The BEST Determination documents environmentally related findings and the suitability of the property for transfer from federal to non-federal ownership. Through the BEST, the U.S. Air Force certifies that it has met its obligations under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9620, and that the future use of the property does not present a current or future risk to human health and the environment if the property is used as planned. The BEST is the result of an analysis of information contained in 11 separate documents referenced therein (collectively, the "Documentation"). As stated above, detailed information concerning the current environmental conditions of the Property (*e.g.*, concentrations of contaminants present and their associated risks) is contained in the EBS. Both the BEST and the EBS were

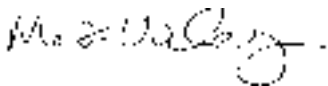
subjected to a 30-day public notice and comment period in April 2002. The risk management activities (the “Remedies”), including any engineering and/or institutional controls required to ensure protection of human health and the environment, along with associated land use restrictions or limitations, are summarized in Enclosure 1 to this letter. Specific provisions regarding reservation of rights, land use restrictions, and covenants can be found in the Deed located at the Bexar County Courthouse. The U.S. Air Force is responsible for maintaining the Remedies even upon transfer of or change in ownership or control of the Property.

With this “Ready for Reuse Determination,” TCEQ and EPA Region 6 agree that Brooks City-Base has successfully completed its investigation, and remediation activities have either been completed or demonstrated to be operating properly and successfully. We also agree that environmental conditions at the property are protective of human health and the environment based on its current uses and anticipated future uses. This evaluation is based on a review of documentation provided to TCEQ and EPA by the U.S. Air Force. The Documentation demonstrates that although releases of chemicals of concern have occurred as a result of activities on the Property, residual concentrations do not present an unacceptable risk to human health or the environment based on risk-based cleanup levels established by TCEQ, given the current and reasonably expected future uses of the Property. To fully understand the current environmental conditions on the Property, a thorough review of the Documentation is recommended. Copies of the Documentation may be obtained from TCEQ, EPA Region 6, or Brooks City-Base at the addresses provided in Enclosure 2.

If conditions at the facility change, including environmental conditions, land use, site receptors, and remedy performance, it will be necessary to revisit this evaluation of suitability for reuse to ensure its continuing protectiveness. The undersigned expressly reserve all rights and authorities to require future action by owners or operators if new or additional information comes to light that impacts this “Ready for Reuse Determination,” whether such information is known as of this date, or is discovered in the future.

Congratulations on this most noteworthy achievement!

Sincerely,



Mark R. Vickery, Deputy Director
Office of Permitting, Remediation
and Registration
Texas Commission on Environmental Quality



Carl E. Edlund, P.E., Director
Multimedia Planning and Permitting
Division
EPA Region 6

Enclosures

ENCLOSURE 1: CURRENT ENVIRONMENTAL CONDITIONS^a

Site No.	Site Name	Status	Cleanup Standard
OT001	Bldg 1020/1030 (Central Accumulation Site)	No Further Action (NFA) Decision Approved	Closed under Risk Reduction Standard No. 2 ^b (RRS #2).
FT002	Fire Training Area #2	Final Remedial action installed; system scheduled to be in operation through 2010; OPS certification issued	OU 1: soil from 0 - 2 ft in depth. Contaminant of Concern (COC) - Lead. Closed under RRS #2. Deed certification filed pursuant to 30 TAC 335.560. Land use restrictions for FPTA #2 include no construction within vicinity of OU2 which would jeopardize the integrity and function of the soil vapor extractions system, the groundwater extraction system and groundwater treatment plant; and no groundwater may be extracted or used in the vicinity of OU2 that would have an adverse hydraulic impact on the groundwater extraction system. COC - trichloroethylene, dichloroethylene
LF003	Landfill #1	NFA Decision Approved	Closed under RRS #3 ^c . Deed certification filed pursuant to 30 TAC 335.566. Garbage, trash, and construction debris burned and covered.
LF004	Landfill #2	NFA Decision Approved	Closed under RRS #3. Deed certification filed pursuant to 30 TAC 335.566. Packaging material, paper products, scrap lumber, and garbage were disposed of.
LF005	Landfill #3	NFA Decision Approved	Closed under RRS #3. Deed certification filed pursuant to 30 TAC 335.566. Paper, packing materials, scrap lumber, and possibly used oil, spent solvents, and paint thinners were disposed of.

Site No.	Site Name	Status	Cleanup Standard
LF006	Landfill #4	NFA Decision Approved	Closed under RRS #3. Deed certification filed pursuant to 30 TAC 335.566. Paper, packing materials, scrap lumber, and possibly used oil, spent solvents, and paint thinners were disposed of.
LF007	Landfill #5 (SWMU 5)	NFA Decision Approved	TCEQ concurred on closure, however required 3 years of post-closure groundwater monitoring. Required post-closure care and controls at the site include no disturbance of the landfill cover, no development of water wells, no drilling for shallow groundwater, maintenance of the landfill cover, and limited groundwater monitoring. Required groundwater monitoring has been completed, and the monitoring wells will be decommissioned in 2003. Glassware, used medical supplies, packing material, paper, paints, thinners, unrinsed pesticide containers, oils, solvents, and contaminated fuels were disposed.
LF008	Landfill #6	NFA Decision Approved	Permitted landfill closed under TCEQ Municipal Solid Waste Program closure standards. Restrictions for the site include maintenance of the landfill cover, limited groundwater well development and approval by TCEQ prior to ground-disturbing activities on the site. No residential development is to occur on this site.; any industrial development must be approved by TCEQ. Solid waste, shop and laboratory waste, contaminated fuels, and possible waste solvents and used oils.
OT009	Fire Training Area #3/Liquid Sludge Disposal Area #2	NFA Decision Approved	Site closed under RRS #2. COC - Total Petroleum Hydrocarbons. Deed certification filed pursuant to 30 TAC 335.560.

Site No.	Site Name	Status	Cleanup Standard
SS010	Bldg 100 Polychlorinated Byphenyls (PCB) Transformer Oil Spill	NFA Decision Approved	PCB contaminated soil was removed. The site was closed under RRS #2. Deed certification filed pursuant to 30 TAC 335.560.
WP011	Liquid Fuel Sludge Disposal Area #1	NFA Decision Conditionally Concurred	TCEQ conditionally concurred with decision of no further action. The condition states that if the site is positively identified during the course of future work at Brooks AFB, the base is obligated to perform remediation activities that meet one or more of the RRS (31 TAC section 335.8(a) and (b)).
AOC Bldg 698	CE/Golf Course Maintenance Areas	NFA Decision Approved	The site was closed under RRS #2. COC - Benzo(a)pyrene and Lead. Deed certification filed pursuant to 30 TAC 335.560.
AOC FFR1	Former Firing Range #1 (at golf course north of North Road	NFA Decision Approved	Lead concentrations were below levels requiring a remedial or removal action. No further action is warranted.
AOC FFR2	Former Firing Range #2 (East of AFCEE building)	NFA Decision Approved	Lead contaminated soil was excavated and removed. TRRP Remedy Standards A ^d Residential PCLs were achieved in accordance with §350.32 such that no institutional control or post-closure care is required
AOC FSR1	Former Skeet Range #1 (housing area)	NFA Decision Approved	Lead and Polynuclear Aromatic Hydrocarbons (PAH) contaminated soil was excavated and removed. TRRP Remedy Standard A Residential PCLs were achieved in accordance with §350.32 such that no institutional control or post-closure care is required

Site No.	Site Name	Status	Cleanup Standard
AOC FSR2	Former Skeet Range #2 (SW end of the aircraft apron)	NFA Decision Approved	Lead and PAH contaminated soil was excavated and removed. An area of approximately 30 ft by 5 ft was not excavated due to the presence of a buried high voltage power line crossing the area of excavation for PAHs. Site closed under Remedy Standards A in accordance with §350.32 for industrial use.
AOC FSR3	Former Skeet Range #3 (NE-SW runway & east of 9 th street)	NFA Decision Approved	Lead concentrations were below levels requiring a remedial or removal action. No further action is warranted.
AOC RCSR	Recently Closed Skeet Range (NW of the family camp)	NFA Decision Approved	PAH contaminated soil was excavated and removed. TRRP Remedy Standards A Residential PCLs were achieved in accordance with §350.32 such that no institutional control or post-closure care is required.
Data Gap 34	Bldg 112A Aqua Fuels System for AVGAS	NFA Decision Approved	Benzene, Ethylbenzene, Toluene, Xylene (BTEX), PAHs, and Lead did not exceed the TRRP Remedy Standards A Commercial/Industrial critical PCLs. Deed notice filed pursuant to 30 TAC 350.111.
Petroleum Substances	Facilities 110, 160, 706, 930, 1102 (demolished), 1150, and 1189; the former UST at Bldg 606 (demolished) and the motor gasoline (MOGAS) tank spill in the golf course area.	NFA	Minimal releases. Sites considered not to have a potential for hazards from contamination. Petroleum products commonly stored at Brooks AFB for laboratory and industrial operations include motor fuels; petroleum, oil and lubricants; solvents; calibrating fluids; and hydraulic fluids. Environmental Baseline Survey (EBS), Appendix C Table C-1, lists facilities that store petroleum products. Table C-3 provides historical data on storage of petroleum products.

Site No.	Site Name	Status	Cleanup Standard
Ordnance	Facilities 1152, 1153, and 1156. Six former ranges.	NFA	Minimal ammunition storage activities. All considered Category 1 ^e . No releases reported. Six former ranges investigated as Areas of Concern under IRP program.
Asbestos	72 buildings tested positive for Asbestos Containing Material (ACM)		Only buildings (excluding Military Family Housing (MFH)) constructed prior to 1978 were surveyed. In addition, ACM was identified in approximately 4,300 ft interconnecting utility tunnels. ACM within the utility tunnels was encapsulate. EBS, Appendix H, Table H-1, contains a summary of ACM survey.
Lead Based Paint	All MFH units and numerous other facilities were constructed prior to and during 1978 and may contain lead based paint.		Equipment at 1 playground and Facilities 414 (chapel annex), 470 (youth center), and 615 (medical clinic) and 33 MFH units sampled tested positive for lead. The playground equipment was replaced, the lead based paint was either removed or encapsulated at Facilities 414, 470, and 615. Projects are ongoing with the MFH area to install vinyl siding on all units and encapsulate lead based paint. EBS, Appendix H, Table H-1, contains a summary of the lead based paint survey.
PCBs			All PCB transformers, capacitors, and switches had been removed from the base and replaced with non PCB-containing equipment. As PCB light ballasts are replaced, they are disposed of in accordance with applicable regulations. One PCB Transformer Oil spill is discussed above (see SS010).

^a Based on documents supplied by the U.S. Air Force.

^b In order to attain RRS No. 2, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health based standards and criteria. Contaminants allowed to remain in place in media of concern (i.e. soil, ground water, surface water, air) must not exceed the health based cleanup levels as specified in 30 TAC §335.556.

^c In order to attain RRS No. 3, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to levels that will not pose a substantial present or future threat to human health and the environment, and must further demonstrate that any residue remaining in place from the treatment will not pose the threat of any future release that would increase the concentrations of contamination in the environmental media above the cleanup levels determined for that particular risk reduction standard as specified in 30 TAC §335.553(e).

^d In order to attain Texas Risk Reduction Program Remedy Standard A, all industrial solid waste and municipal hazardous waste and waste residues must be removed or decontaminated to health and ecological based standards and criteria. In order to be released from the requirement to file an institutional control in accordance with 30 TAC §350 Subchapter F, contaminants that remain in place in media of concern (i.e., soil, ground water, surface water, air) must not exceed residential protective concentration levels (PCLs).

^e 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).

ENCLOSURE 2
AGENCY CONTACTS

For copies of the documents referenced in the Ready for Reuse Determination, please contact:

Ms. Debra Tellez
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All media inquiries should be directed to the EPA Region 6 Office of External Affairs at (214) 665-2200.