

THOMAS M. REYNOLDS
28TH DISTRICT, NEW YORK

COMMITTEE ON
WAYS AND MEANS
COMMITTEE ON
HOUSE ADMINISTRATION
DEPUTY MAJORITY WHIP

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ROCHESTER, NY 14615
(585) 683-5570

Congress of the United States
House of Representatives
Washington, DC 20515

August 10, 2005

General Lloyd W. "Fig" Newton (USAF, Ret), Commissioner
2005 Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste 600
Arlington, VA 22202

Dear Commissioner Newton,

I am writing to you regarding the upcoming hearing dealing with the environmental stewardship of installations recommended for closure or realignment.

In the recent General Accountability Office (GAO) report, and the GAO testimony given before the Base Realignment and Closure Commission, officials testified that the Pentagon failed to include required environmental costs associated with base closing recommendations, which adds to the federal government's cost of closing the Niagara Falls Air Reserve Station.

In light of this, I have enclosed some additional information for your review, detailing the Niagara Falls Air Reserve Station's estimated environmental cost that the Air Force failed to provide as a potential closure costs for this installation.

The Niagara Falls Air Reserve Station stores more fuel on site than the entire tanker task force off-loaded in an entire month during Operation Iraqi Freedom. Niagara can store 865,000 gallons of fuel.

As you know, the Pentagon is required to completely restore any base they close for future use. Given that fact, the question remains how restoration of the Niagara Falls Air Reserve Station is possible when no environmental clean-up has been factored into Air Force cost estimates.

Further, the clean-up costs provide further evidence that closing the Niagara Falls Air Reserve station will not provide savings to the Department of Defense.

As I testified before the BRAC Commission on 27 June 2005, "either through willful intent, or a simple miscalculation, the Air Force could only find 'savings' by contravening the GAO's guidelines on how to calculate personnel savings.

They also failed to include the cost of "enclaving" the tenants who remain if the base closes, like the Army MEPS, and the North East Air Defense system, for example.

"Finally, they used outdated data when calculating the cost of operating the base. In fact, when the corrected COBRA data was briefed to your staff last week, it showed that costs actually EXCEEDED savings."

These latest costs to federal taxpayers add to the already erroneous savings estimates provided by the Air Force.

Please let me know if there's any more information I can provide you with or any further help I can give during this important process. I appreciate your efforts on behalf of our Armed Forces and our nation; and I have no doubt you will reach a decision that benefits both the military and the American people.

Sincerely,

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THOMAS M. REYNOLDS
United States Representative

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August 19, 2005

The Honorable Philip Coyle, Commissioner
2005 Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste 600
Arlington, VA 22202

Dear Commissioner Coyle:

As the BRAC Commission begins its final deliberations, I know the incredible amount of time and effort you and Commission staff have put into this effort, and thank you for your service to the commission and to our country.

Having had the chance to speak with you at the first Commission hearing, I am taking this opportunity to again make the case for removing the Niagara Falls Air Reserve Station from the recommended closure list. Doing so would meet the criteria and legislative intent for which BRAC was intended.

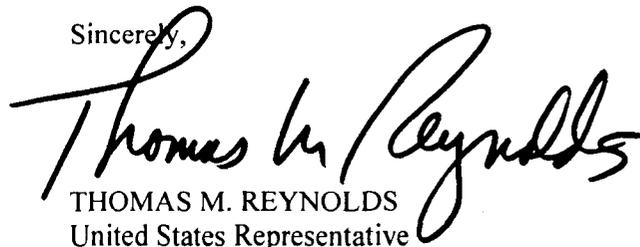
As we discussed, staff has validated our corrected COBRA data, which shows that the Air Force's recommended closure will produce no savings. Further, the commission's General Counsel noted that the recommended closure does not meet the legislative intent. General Heckman said that Niagara Falls was recommended for closure to "correct an imbalance" in the C-130 fleet, which is a programmatic move, and beyond the scope and mission of BRAC.

While community support may not count as criteria, the letters the Commission has received as well as the resolutions from local governments forwarded to BRAC yesterday show how much this base means to the area.

And, finally, since military value is what this is all about, it needs to be noted that the 914th has once again been mobilized, making them the first air reserve component to go to Iraq for a third time. Even with these deployments, we have no problem retaining our service members. The wings' have retention rates in excess of 95 percent, which exceeds Active Duty retention rates by over 50 percent.

Thank you again for your time and service and, as always, please feel free to contact me if you would like to discuss this further.

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August 10, 2005

The Honorable Samuel K. Skinner, Commissioner
2005 Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste 600
Arlington, VA 22202

Dear Commissioner Skinner,

I am writing to you regarding the upcoming hearing dealing with the environmental stewardship of installations recommended for closure or realignment.

In the recent General Accountability Office (GAO) report, and the GAO testimony given before the Base Realignment and Closure Commission, officials testified that the Pentagon failed to include required environmental costs associated with base closing recommendations, which adds to the federal government's cost of closing the Niagara Falls Air Reserve Station.

In light of this, I have enclosed some additional information for your review, detailing the Niagara Falls Air Reserve Station's estimated environmental cost that the Air Force failed to provide as a potential closure costs for this installation.

The Niagara Falls Air Reserve Station stores more fuel on site than the entire tanker task force off-loaded in an entire month during Operation Iraqi Freedom. Niagara can store 865,000 gallons of fuel.

As you know, the Pentagon is required to completely restore any base they close for future use. Given that fact, the question remains how restoration of the Niagara Falls Air Reserve Station is possible when no environmental clean-up has been factored into Air Force cost estimates.

Further, the clean-up costs provide further evidence that closing the Niagara Falls Air Reserve station will not provide savings to the Department of Defense.

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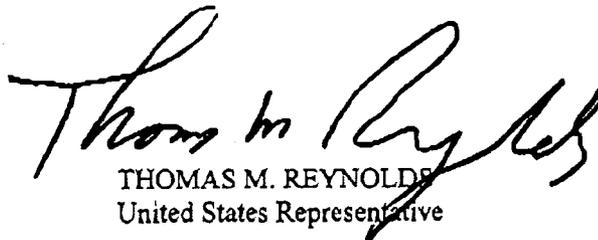
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The Honorable James V. Hansen, Commissioner
2005 Defense Base Closure and Realignment Commission
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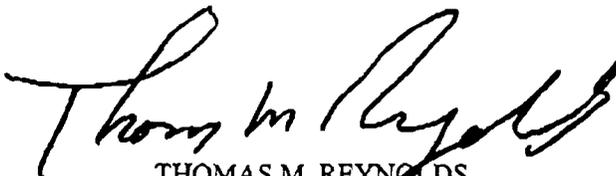
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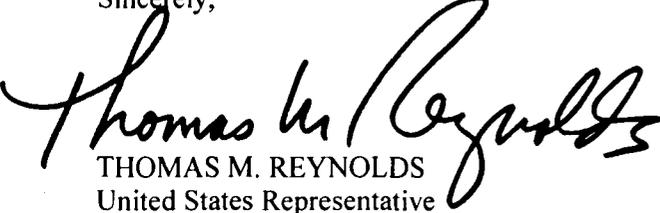
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THOMAS M. REYNOLDS
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AUG. 10. 2005 12:48PM

HFF-DCRep. Thomas_M._Reynolds

NO. 0261 P. 8

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August 10, 2005

Brigadier General Sue E. Turner (USAF, Ret), Commissioner
2005 Defense Base Closure and Realignment Commission
2521 S. Clark St., Ste 600
Arlington, VA 22202

Dear Commissioner Turner,

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Point Paper

1. **SUBJECT: Environmental Cleanup/Closure Cost for Niagara Falls ARS**
2. **DISCUSSION:** This paper gives a recapitulation of the estimated environmental cleanup and required closure costs for the past and current operations carried out during the various missions from 1950 to present day.
3. **Environmental Cost Matrix**

	2006	2007	2008	2009	2010	2011	2012	2013	2014 - 2025
Installation Restoration Program (IRP)	230	230	230	230	230	125	250	250	125/YR
Hazardous Waste Disposal/site Closure				100	60	20			
Storage Tanks Closure Analysis & Cleanup	60	50	40	120	80	60			
Total	290	280	270	450	370	205	250	250	1500

ALL COSTS ABOVE SHOWN IN 2005 Dollars (000's)

Total \$ 3,865,000

Prepared: 27 Jul 2005

914* MSG/CE

Position Paper on Environmental Closure Costs
26 Jul 05

The purpose of this paper is to address the environmental clean up costs associated with the closure of the Niagara Falls Air Reserve Station. Environmental costs are associated with the following activities: Installation restoration program, hazardous waste storage and disposal, oil/water separator cleanout and Aqueous Film Forming Foam (AFFF) trench cleanout, storage tank emptying and site investigations. These costs represent estimates of the present environmental condition.

Costs are associated with the following:

Installation Restoration Program (IRP) Costs, see detailed information, Pages 3 & 4

Hazardous Waste Disposal, see detailed information Page 5

Storage Tanks, see detailed information Pages 6 & 7

1. SUBJECT - Environmental Cleanup Costs for Niagara Falls ARS, NY
2. DISCUSSION - This paper discusses the Installation Restoration Program cleanup costs associated with closing the base.

- Installation Restoration Program (IRP)

-- The Niagara Falls ARS IRP was initiated in 1983 with 13 sites listed as potential sources of contamination requiring cleanup. One additional site was added in 1986.

-- As of July 2005 six sites remain that require further cleanup and monitoring

- Site 3: Old landfill near the Walmore Road gate
- Site 5: Former Air National Guard hazardous waste storage pad
- Site 7: JP4 tank truck spill
- Site 8: Former Air National Guard hazardous waste storage pad
- Site 10: Former fire training pit #1
- Site 13: Former underground tank pit

-- Receive approximately \$230,000 per year from HQ AFRC to operate the program

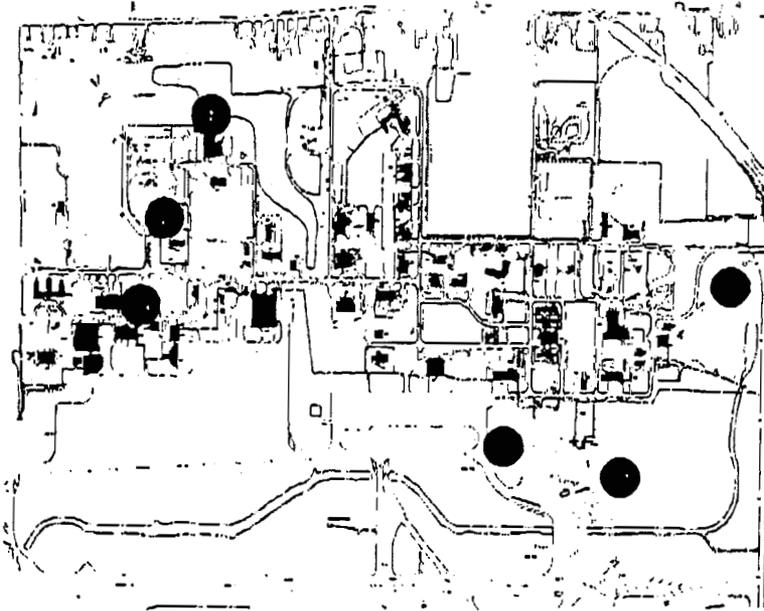
- Funds are used for sampling and analysis of ground water contamination from 120 monitoring points and to operate three pump and treat systems
- The 120 monitoring points consist of: 83 monitoring wells, 6 pumping wells, 5 recovery wells, 25 piezometers

-- Will take \$1,407,000 to monitor, operate and maintain the remaining 6 sites thru 2010

- All of the remaining sites should be closed by 2010 except for site 10, fire training pit #1. Site 10 will be in operation thru at least 2015.
- This estimate assumes all of the monitoring points will be abandoned in place. If all 120 monitoring points have to be removed, it will cost approximately \$50,000 - \$100,000 more.

Atch

Map of Niagara Falls ARS showing location of Active IRP sites



HW Program Closure Costs, NFARS from James Nagelhout

The 914th is on track to spend approximately \$25K on waste disposal (mostly DRMO) for CY 2005. Joe Candella reports the 107th will spend roughly \$4,400 for the same period. If the base were to close, disposal costs would rise an additional \$15K and \$6K, respectively. These increases would be due to collection and disposal of waste chemicals from base supply, maintenance organizations (NYS, BOS & in-house facility & acft maint, etc.). We all know how much stuff is "rat-holed" in buildings such as 626, 512, etc. Includes lab-packing costs. Add in an extra \$3K basewide for more waste containers (drums, Triwall boxes, etc).

Associated costs, such as analytical, would see a commensurate increase. I estimate the 914th would need \$15K and the 107th \$10K over and above their normal costs on an average year. Included in the costs is PCB sampling for hydraulic/pneudraulics equipment being turned into DRMO requiring a non-PCB certification and test results. Also included is sampling & analysis of OWS for cleanout and disposal of all contents. The 914th has 9 OWS, the 107th has 10. I estimate the 914th would spend \$27K for such cleanouts (about \$3K each), Joe Candella estimates \$30K.

Both aqueous and solvent tanks would need to be drained and wiped down, and contents disposed of. The 914th would spend about \$1.3K for 2 solvent tanks and 2 recycling partswashers. The 107th has 2 aqueous and 7 solvent tanks and would spend about \$2K.

If hangar AFFF systems were purged, and concentrate disposed of, an estimated \$10K would be required for each hangar (4 hangars total, 2 each for both the 914th and 107th).

Joe brought up the question of extra solid waste being disposed of (especially paper) from offices as they are closed down. Do we pay extra for more weight, or is the cost constant? I'll leave it up to Ellen to cover that, but it's something to think about.

Jim N.

Estimation of Environmental Closure Costs

Inventory as of 14 Jun
 2004

Tank	Volume (gallons)	Fuel Type	Estimated Cost
310 Emergency Generator	55	Diesel	\$1,000.00
532A	5,000	Diesel	\$1,000.00
532B	5,000	Unleaded gasoline	\$1,000.00
620A	528	Used Oil	\$1,000.00
724	275	Diesel	\$1,000.00
724A	18	Unleaded gasoline	\$1,000.00
724B Emergency Generator	107	Diesel	\$1,000.00
727A Emergency Generator	44	Diesel	\$1,000.00
732	275	Diesel	\$1,000.00
732A Emergency Generator	27	Diesel	\$1,000.00
808A Emergency Generator	81	Diesel	\$1,000.00
828A	280	Diesel	\$1,000.00
828B	280	Diesel	\$1,000.00
828C	280	Diesel	\$1,000.00
901A Emergency Generator	43	Diesel	\$1,000.00
906D	2,000	JP-8	\$1,000.00
920A	5,000	Unleaded gasoline	\$5,000.00
920B	5,000	Unleaded gasoline	\$5,000.00
920C	5,000	Diesel	\$5,000.00
937	50	Diesel	\$1,000.00
937A Emergency Generator	5	Diesel	\$1,000.00
1055A	2,500	JP-8	\$1,000.00
2513	158,345	JP-8	\$10,000.00
2514	308,096	JP-8	\$10,000.00
2515	165,358	JP-8	\$10,000.00
2520A	2,000	JP-8 and water	\$10,000.00
2523	105,000	JP-8	\$10,000.00
2524	105,000	JP-8	\$10,000.00
Total Vol of Tank Storage (gal)	875,647	Estimated Cost	\$94,000.00

POL transfer pipeline (gal)	\$5,000.00
Low Point Drain Investigation (10)	\$10,000.00
Hydrant Pits (5)	\$10,000.00
Refueling Truck Parking (2)	\$2,000.00
Propylene Glycol Tanks (3)	\$3,000.00
AFFF Tanks (3)	\$3,000.00
High Expansion Foam Tank	\$1,000.00
Open Spill with NYSDEC	\$20,000.00

Estimated Total
 Cost **\$148,000.00**

Reference: 6 NYCRR 613.9(b) Closure of tanks permanently out-of-service.

(1) Any tank or facility which is permanently out-of-service must comply with the following:

(i) Liquid and sludge must be removed from the tank and connecting lines. Any waste products removed must be disposed of in accordance with all applicable state and federal requirements.

(ii) The tank must be rendered free of petroleum vapors. Provisions must be made for natural breathing of the tank to ensure that the tank remains vapor free.

(iii) All connecting lines must be disconnected and removed or securely capped or plugged. Manways must be securely fastened in place.

(iv) Above ground tanks must be stenciled with the date of permanent closure

(v) Underground tank(s) must either be filled to capacity with a solid inert material (such as sand or concrete slurry) or removed. If an inert material is used, all voids within the tank must be filled.

(vi) Above ground tanks must be protected from floatation in accordance with good engineering practice.

(2) Storage tanks or facilities which have not been closed pursuant to paragraph 613.9(b)(1) above, are subject to all requirements of this Part and Part 612 of this Title including but not limited to periodic tightness testing, inspection, registration and reporting requirements.

Cleanup /Closure cost were estimated to be about \$260,000 over a three year work effort. This includes the cleanup of Tank B and the permanent closure or removal of the underground and aboveground tanks shown above.

BRAC Commissioner Talking Points

JOINT USE AIR RESERVE COMPONENT BASE

Niagara is the only Base on the list in which two Air Reserve Component wings are co-located on same facility, both of which would be retained by voting to disapprove.

57% of the facilities are shared use which creates a number of efficiencies. With US Army MEPS on base and an opportunity to bring Army Reserve unit across the runway onto Niagara Falls Air Reserve Station, opportunities exist for even greater joint use and efficiencies.

Commissioners who visited the base saw the ability of the Niagara Falls to permanently accommodate 17 C-130's and 13 KC-135 tankers with no military construction.

HOMELAND DEFENSE

Location makes its tanker wing the *sole unit optimized* to support Combat Air Patrol in both the Northeast and the Midwest.

Niagara Falls is within 4 miles of the Canadian border over which 61% of all US-Canadian commercial traffic crosses and 4.5 miles from the Niagara Power Project, the Northeast's greatest electricity generator.

If the base is closed and the 107th moves, the Governor will lose significant command and control capability in Western Region 6 under jurisdiction of the Commander of the 107th at Niagara. which will have no military base within 160 miles of the 2nd most populated portion of the State.

MILITARY VALUE

The Air Force's rationale to close Niagara was to "correct a documented imbalance in the C-130 mix between the Active Duty and Reserve." The number of C-130s in the Active Duty Air Force inventory vs. Air Force Reserve will shift by a total of 4 as a result of USAF's BRAC recommendations. This underscores that the stated rationale to close Niagara is *groundless*.

Our wings' military value is clearly validated by their repeated deployments to Afghanistan and Iraq and yet with these deployments, we have no problem retaining our servicemembers.

The 914th has been to both Iraq & Afghanistan and returns to Iraq for the 3rd time this summer while the Commission is in final deliberations. The 107th has deployed multiple times to support Operations Iraqi Freedom and Enduring Freedom. Even with these multiple deployments based upon their high skill level, the wings have retention rates in excess of 95% which exceeds Active Duty retention rates by over 50%.

DECLINE IN DOD PRESENCE IN NEW YORK AND THE NORTHEAST IS DRASTIC

If USAF recommendations are approved:

- New York would lost 33% of its flying wings.
- Airlift in the Northeast would be limited to one site (Quonset RI) and reduced by 80% (from 61 down to 11).
- Tanker capability in the Northeast would be reduced by 33% (from 57 down to 40).

The major military installations in New York, the 3rd most populace State in the County with the largest city (NYC), has already been reduced by over 40%. In 1988, we had 15 major military installations and today, including Niagara Falls Air Reserve Station, we have only 9 remaining.

The absence of military presence in the region will hurt homeland defense, debilitate recruitment & retention and erode support for the military from the lack of connectivity with the voting population.

BRAC Commissioner Talking Points

Page 2

RECRUITMENT & RETENTION

87% of service-members at Niagara Falls live within 50 miles of the base. There will be a significant loss of Technicians if the base were to close as the next closest base to Niagara is over 160 miles away (Hancock ANG Base in Syracuse).

The units at Niagara Falls have a 95% retention rate which exceeds the Active Duty rates of approximately 60% by more than half. The average reservist at Niagara has 14 years of experience.

The closure of Niagara will decimate the recruitment and retention in the region which is the 2nd most populace portion of the State.

DOD recognized the importance of Niagara to recruitment by the relocation of the Military Entrance Processing Site from Buffalo to its current location on the Base.

TANKER / C-130 CAPABILITIES

Niagara currently has 8 KC-135R's and 8 C-130Hs. Commissioners who visited the base saw the ability of to permanently accommodate 17 C-130's and 13 KC-135 tankers with no military construction.

Niagara's runways enable the KC-135's to take off with full combat fuel load and is the furthestmost western C-130 base which can reach European Command without re-fueling.

Niagara's C-130 Night Vision Goggle expertise for special operations mission is sustained by our sparsely populated, encroachment free training environment (to include joint training with Fort Drum) that includes a 15,000 square mile Low Altitude Training and Navigation range.

Location makes its tanker wing the *sole unit optimized* to support Combat Air Patrol in the Northeast and the Midwest. Can concurrently maintain an ability to support the Air Bridge as part of the Northeast Tanker Task Force.

The base's efficiency is underscored by the fact that Niagara flies over 24% of the Northeast Tanker Task Force missions with the fewest numbers of planes among the 5 bases in the Tanker Task Force.

CORRECTED COBRA SHOWS NO SAVINGS TO CLOSE NIAGARA

Niagara was slated to be a gainer until late in the process (4th look) when USAF was looking for savings, but as corrected COBRA shows, there are no savings from closing Niagara.

Air Force COBRA data erroneously shows a two year pay-back and a \$199M Net Present Value savings because the Department:

- Created false, recurring savings from the elimination of 1189 Drill positions. GAO has clearly indicated that these savings cannot be taken unless there is a commensurate reduction in End Strength. Yet, the Department testified before Congress in April of 2005 that End Strength would not be reduced as a result of BRAC.
- Failed to include \$65 M in one-time costs to enclave the Military Entrance Processing Site and the Ground Air Transmission Radar for the Northeast Air Defense Sector mission which will remain at the site of the base.

The Commission is in receipt of corrected COBRA which shows **no savings to the Government** to close Niagara Falls once these adjustments are included in the COBRA analysis.