

FINAL

**ENVIRONMENTAL CONDITION OF
PROPERTY REPORT**

**HOT SPRINGS
U.S. ARMY RESERVE CENTER (AR020)
200 RESERVE STREET
HOT SPRINGS, ARKANSAS 71901**

Prepared for:

**U.S. Army Corps of Engineers — Louisville District
Engineering Division — Environmental Branch
600 Dr. Martin Luther King, Jr. Place
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February 7, 2007

CERTIFICATION

All information/documentation provided accurately reflects the environmental condition of the property. This ECP Report is in general accordance with the U.S. Department of Defense (DoD) requirements for completion of an Environmental Condition of Property (ECP) Report.

JAMES WHEELER II
Chief, Environmental Division
90th Regional Readiness Command

DATE

The undersigned certifies the contents of this report are in general accordance with DoD policies for the completion of an ECP Report.



LENARD GUNNELL, P.G.
Project Geologist
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February 7, 2007

DATE

EXECUTIVE SUMMARY

Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers, Louisville District, has prepared this Environmental Condition of Property (ECP) Report for the Hot Springs U.S. Army Reserve (USAR) Center (Facility ID AR020), hereafter referred to as the "Site" or "USAR Center." The Site is located at 200 Reserve Street in Hot Springs, Garland County, Arkansas.

This ECP Report was conducted in conformance with primary Department of Defense (DoD) and Army guidance, the DoD's Base Redevelopment and Realignment Manual, DoD 4165.77-M, Army regulations and the American Society for Testing and Materials Designation D 6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys*, as secondary guidance when it was not inconsistent with the primary guidance.

This ECP Report details the history of the property, including the USAR and any prior tenant uses of the Site and the resulting environmental condition of the property.

The USAR Center is on 1.43 acres of land with three permanent structures: a 34,632-square-foot Administration Building, a 36-square-foot flammable materials storage structure, and a 108-square-foot hazardous materials storage building. The Site is currently occupied by the 489th Engineering Battalion Company, Combat Mechanized Engineers.

Based on a review of aerial photographs, U.S. Geological Survey topographical maps, and Sanborn fire insurance maps dating back to 1890, the Site was divided into six parcels and portions were developed. The developments on the Site in 1890, from west to east, included: a boarding house (McCrary Boarding House and subsequently McCrary Hotel) in the northwest parcel, Hotel Eastman and a house in the southwest parcel, a dwelling and portion of a wood pile on the south-central parcel, and a wood pile on the remaining three parcels. The Hotel Eastman building is documented as containing a carpenter shop, bath house, workshop, and two engines (Dynamo Room). From 1925 to 1942, various ancillary hotel operations including a laundry, garage (Eastman Garage Company), and the Laverne Apartments were present on the Site. The military took over the Hotel Eastman as an annex of the Army-Navy Hospital from October 1943 until June 1954, when the Army was ordered to evacuate the building. The McCrary Hotel was replaced with a building for U.S. Government occupancy in 1944; that building covered the northwestern and north central parcels. The Eastman Hotel was demolished in November 1958. Site occupants in the early 1960s include the City Police Department and U.S. Navy Electronics Facility and, in late 1960s, the U.S. Navy Training Facility and USAR Center. Polk city directories list the USAR at the Site from 1971 to 2005.

The Administration Building was constructed in 1944 and other building tenants, beyond those discussed above, include: the Hot Springs Rehabilitation Thrift Store, which leases an approximately 1,900-square-foot area in the northeast portion of the main floor, and has sold used clothing and household items since 1994; and the Hot Springs Rehabilitation Center, which has leased office space at the facility since at least 1987.

Areas of potential environmental concern were reviewed and the TEJV found no significant concerns relating to the environmental condition of the Site. In accordance with DoD policy defining the classifications (see S.W. Goodman Memorandum dated October 21, 1996), the Site has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

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List of Acronyms and Abbreviations

ACM	asbestos-containing material
ADEQ	Arkansas Department of Environmental Quality
ADPC&E	Arkansas Department of Pollution Control & Ecology
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure Act
BRRM	Base Redevelopment and Realignment Manual
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CESQG	conditionally exempt small-quantity generator
CFR	Code of Federal Regulations
CORRACTS	Corrective Action Sites
DoD	Department of Defense
EBS	Environmental Baseline Survey
ECCI	Environmental, Compliance & Construction, Inc.
ECP	Environmental Condition of Property
ERNS	Emergency Response Notification System
FEMA	Federal Emergency Management Agency
gpm	gallons per minute
hazmat	hazardous material
kg	kilogram
LBP	lead-based paint
LQG	large-quantity generator
LUST	leaking underground storage tank
MEP	military equipment parking
mg/kg	milligram per kilogram
NBC	Nuclear, Biological, and Chemical
NETR	Nationwide Environmental Title Research, LLC
NFRAP	No Further Remedial Action Planned
NPL	National Priorities List

OWS	oil-water separator
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
POL	petroleum, oil, and lubricants
RCRA	Resource Conservation and Recovery Act
RCRAInfo	RCRA Information
RQ	reportable quantity
RRC	Regional Readiness Command
SQG	small-quantity generator
TBA	Targeted Brownfields Assessment
TEJV	Terraine-EnSafe Joint Venture
TSD	treatment, storage and disposal
USACE	U.S. Army Corps of Engineers
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USAR	U.S. Army Reserve
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
UST	underground storage tank
VWR	vehicle wash rack

1.0 INTRODUCTION

Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers (USACE) Louisville District, was authorized to prepare an Environmental Condition of Property (ECP) Report for the Hot Springs U.S. Army Reserve (USAR) Center (Facility ID AR020), in response to the Base Realignment and Closure Act (BRAC) 2005 legislation. The work was performed under Contract No. W912QR-04-D-0044, Delivery Order No. 0008. The facility located at 200 Reserve Street in Hot Springs, Garland County, Arkansas, is hereafter referred to as the "Site" or "USAR Center." In support of the ECP, a visual reconnaissance of the Site was conducted on August 2, 2006. The purpose of the reconnaissance was to visually obtain information indicating the likelihood of recognized environmental conditions in connection with the Site.

1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY

The Military Department with real property accountability shall assess, determine, and document the environmental condition of all transferable property in an ECP Report. This ECP Report is based on readily available information. Pursuant to the Department of Defense's (DoD's) policy, set forth in the Base Redevelopment and Realignment Manual (DoD 4165.66-M, March 1, 2006) Section C8.3 (BRRM), the primary purposes of the ECP Report include the following:

- Provide the Army with information it may use to make disposal decisions.
- Provide the public with information relative to the environmental condition of the property.
- Assist in community planning for the reuse of BRAC property.
- Assist Federal agencies during the property screening process.
- Provide information for prospective buyers.
- Assist prospective new owners in meeting the requirements under U.S. Environmental Protection Agency's (USEPA) "All Appropriate Inquiry" regulations.
- Provide information about completed remedial and corrective actions at the property.
- Assist in determining appropriate responsibilities, asset valuation, and liabilities with other parties to a transaction.

The ECP Report contains the information required to comply with the provisions of 40 Code of Federal Regulations (CFR) Part 373, which require that a notice accompany contracts for the sale of, and deeds entered into, for the transfer of federal property on which any

hazardous substance was stored, released or disposed of. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 120(h) stipulates that a notice is required if certain quantities of designated hazardous substances have been stored on the property for one year or more — specifically, quantities exceeding 1,000 kilograms (kg) or the reportable quantity (RQ), whichever is greater, of the substances specified in 40 CFR 302.4 or one kg of acutely hazardous waste as defined in 40 CFR 261.30. A notice is also required if hazardous substances have been disposed of or released on the property in an amount greater than or equal to the RQ. Army Regulation 200-1 requires that the ECP Report address asbestos, lead-based paint (LBP), radon and other substances potentially hazardous to human health.

This ECP Report used the American Society for Testing and Materials Designation D 6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys* as a guideline when not inconsistent with the BRRM, CERCLA § 120, Army regulations and other applicable Army guidance.

1.2 SCOPE OF SERVICES

This ECP covers the 1.43-acre Hot Springs USAR Center at 200 Reserve Street in Hot Springs, Garland County, Arkansas. The property is bounded by the Hot Springs Rehabilitation Center to the north, a federal building and parking lot to the west, a vacant lot and Sentinel Record to the south, and a vacant lot and a residence to the east. A general Site location map, a site layout map, historical topographic maps and aerial photographs, a wetland map, and a Federal Emergency Management Agency (FEMA) flood plain map are provided as figures in Appendix A. Appendix B provides photographs taken during the August 2006 Site visit. Appendix C provides chain-of-title information. Historical environmental documents and reports are provided in Appendix D. The environmental database report is provided in Appendix E.

This ECP Report classifies the property into one of seven DoD Environmental ECP categories as defined by the S.W. Goodman Memorandum dated October 21, 1996. The property classification categories are as follows:

- 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 release or disposal of petroleum products 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.
- Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.
- Category 6: Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
- Category 7: Areas that are not evaluated or require additional evaluation.

1.3 ASSUMPTIONS AND LIMITATIONS

This report was prepared to permit formulation of an opinion of the environmental condition of the Site. Opinions on the environmental conditions at the Site are based on information from the Site reconnaissance, interviews, and collection and review of readily available information. New information or changes in Site use could require a review and possible modification of the findings and conclusions contained in this report.

The information obtained from the USAR, the USAR's representatives, individuals interviewed and prior environmental reports was considered to be accurate unless reasonable inquiries indicated otherwise. Conditions observed were considered representative of areas that were not accessible unless otherwise indicated.

This ECP Report presents a summary of readily available information on the environmental conditions of, and concerns relative to, the land, facilities, and real property assets at the USAR Center. Its findings are based on a record search of readily available historical documents, a thorough review of the applicable and relevant documents, a visual Site reconnaissance conducted on August 2, 2006, and interviews with personnel knowledgeable about the Site and its history. Extensive environmental investigations and reports and Site historical documents were reviewed in support of this ECP. Information obtained from these other studies is reflected within this report by reference. A complete list of references is provided as Section 9.0.

All Site buildings were visually inspected during the Site reconnaissance. However, a 100% visual reconnaissance of each building (e.g., attics, crawl spaces, etc.) was not practical due to accessibility restrictions. No sampling or analysis of any media was conducted during this survey.

2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

The visual Site reconnaissance included a driving and walking tour of the facility and surrounding area, and a walking assessment of the developed area of the Site and all buildings. The visual Site reconnaissance was conducted by TEJV personnel on August 2, 2006, to field-verify information produced in the document review and to identify recognized environmental conditions of property.

A reconnaissance of the Site perimeter was conducted to evaluate adjacent property uses that could contribute to any environmental contamination detected on the Site. TEJV personnel walked and drove on roads along the perimeter to visually identify any contiguous properties that appear, in TEJV's professional judgment, to have contamination that could migrate to the Site. The findings of the perimeter survey are presented in Section 4.0.

2.1 SITE LOCATION

The Site address is 200 Reserve Street in downtown Hot Springs, Garland County, Arkansas. As shown in Figure 1 in Appendix A, the property is bounded by the Hot Springs Rehabilitation Center to the north, a federal building and parking lot to the west, a vacant lot and Sentinel Record building to the south, and a vacant lot and a residence to the east.

2.2 ASSET INFORMATION

Facility Name and Address:	Hot Springs USAR Center (AR020) 200 Reserve Street Hot Springs, Arkansas 71901
Property Owner:	U.S. Government
Date of Ownership:	Parcels obtained under five chains from 1943 to 1947
Current Occupant:	489 th Engineering Battalion Company, Combat Mechanized Engineers
Zoning:	Commercial
County, State:	Garland County, Arkansas
USGS Quadrangle:	Hot Springs North
Section/Township/Range:	Section 33, Township 2 South, Range 19 West

Latitude/Longitude: 34° 30' 41.8" North/93° 3' 13.0" West

Legal Description: All those certain pieces or parcels of land being Lots 1, 2, 3, 4, 5, and 6, Block 85, Hot Springs Reservation, situated and lying in Section 33, Township 2 South, Range 19 West in the City of Hot Springs, Garland County, State of Arkansas.

2.3 PHYSICAL DESCRIPTION

A Site layout map of the USAR Center is provided as Figure 2 in Appendix A. Photographs 1 through 9 in Appendix B show the adjacent properties. Photographs 10 through 20 show the interior and exterior of the USAR Center building and specific environmental conditions or other Site-specific features.

The property covers a city block and is bounded by Reserve Avenue to the north, Opera Street to the west, Spring Street to the south, and Civic Avenue to the east. The property is terraced, and slopes from north to south. Approximately 95% of the Site is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.), while the remainder is covered by grass. There is no evidence of erosion or excavation on Site. A Mimosa tree and daylilies were noted in the northeastern portion of the Site in a flower bed near the Thrift Shop. Vehicle access is via entrances from Spring Street.

The USAR, 90th Regional Readiness Command (RRC), 489th Engineering Battalion Company, Combat Mechanized Engineers uses the Site for offices, physical and academic training, storage of equipment and military vehicles, and for conducting drill-training activities. The Site has three buildings: a 34,632-square-foot Administration Building, a 36-square-foot flammable materials storage structure, and a 108-square-foot hazardous materials (hazmat) storage building. The Site layout plan is shown in Figure 2.

The Administration Building has a main floor consisting of a classroom area, offices, storage areas, and a basement with a kitchen, assembly hall, secure arms vault, a platoon storage area, several other storage areas, and a few offices. A grease trap is present in the kitchen. The Hot Springs Rehabilitation Thrift Store, which sells used clothing and household items, leases approximately 1,900 square feet in the northeast portion of the main floor of the Administration Building. The Thrift Store has operated since 1994. The Hot Springs Rehabilitation Center has leased office space at the facility since before 1987.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Surface water flows generally from north to south across the Site. A drainage swale diverts storm water from west to east near the center of the property. On the eastern side of the property are three storm water drains, two are on the northern side of the retaining walls and one storm drain is in the southeastern-most corner of the property. The storm drains discharge to the storm water sewer. From that point, the water flows southerly. The ground surface slopes toward the northern side of the building where surface water pools. During heavy rainfall events, the water seeps into the building basement. The water then drains into the floor drains in the basement which discharges to the sanitary sewer. The nearest surface water body is Hot Springs Creek, which is located approximately 500 feet west of the Site, behind Bathhouse Row on the east side of Central Avenue (U.S. Geological Survey [USGS], 2006).

2.4.2 Hydrogeological Characteristics

The Site is underlain by the Stanley Shale. The shale in the area generally limits groundwater movement. Groundwater in the Stanley Shale yields only a few gallons per minute. The groundwater system consists of hot water and cold water components. The hot water is thought to be regionally derived recharge from rainfall where the water flows to 4,500 to 7,500 feet depth and is heated. The heated water then rises to the surface along shallow northeast trending faults, joints, and fractures. The cold water is produced as locally derived recharge from rainfall and flows along northeast trending faults, joints and fractures. The lower member of the Arkansas Novaculite is the primary aquifer of shallow groundwater flow. Shallow groundwater generally indicates flow is toward Hot Springs Creek (USGS, 2006). Hot Springs Creek is located approximately 500 feet west of the Site, behind Bathhouse Row on the east side of Central Avenue.

The Site is near the Hot Springs National Park in the physiographic area of the Ouachita Mountains. According to the U.S. Department of Agriculture (USDA) Soil Conservation Service survey, the Yanush soil component is the only soil association on the Site. The Yanush soil is deep, well drained, moderately permeable soil that forms in loamy colluviums from chert and novaculite. The Yanush soil is not considered a hydric soil. This soil is found on side slopes and foot slopes of the Ouachita Mountains. Mean annual temperature is 62° Fahrenheit and the mean annual precipitation is 48 inches.

The rocks cropping out in the area are sedimentary rocks, although intruded igneous rocks are exposed in the region (USGS, 2006). The beds of sedimentary rocks generally are steeply inclined because of mountain building forces in late Paleozoic time.

2.5 SITE UTILITIES

Entergy provides electricity to the Site. According to USAR personnel, the facility was rewired by Gingrich Electric in 1998. The City of Hot Springs provides potable water, sanitary, and storm water service to the facility. Natural gas is provided by Arkla. The water, sewer, and gas lines were installed when the Administration Building was constructed.

2.6 WATER SUPPLY WELLS AND SEPTIC SYSTEMS

Neither water supply wells nor septic systems were identified on the Site.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Nationwide Environmental Title Research, LLC (NETR) Real Estate Research and Information prepared a historical chain-of-title report for the Site, which is provided in Appendix C. The property has been conveyed under five chains. Key historical deed transfers of the Site are as follows:

Chain 1

- New York Hotel Company purchased lot from L.G. Blasdel (January 8, 1903)
- Mary I. McLain purchased lot from New York Hotel Company (March 16, 1908)
- Grace Maroney purchased lot from Mary I. McLain (May 4, 1938)
- Mac and Mary T. Shreffler purchased lot from Grace Maroney (May 16, 1942)
- United States of America purchased lot from Mary T. Shreffler (March 19, 1947)

Chain 2

- New York Hotel Company purchased lot from W.H. and Maria Gaines (September 6, 1889) and L.G. Blasdel (January 8, 1903)
- The Eastman Company purchased the lot from the New York Hotel Company (January 18, 1938)
- H. Grady Manning, et al., purchased the lot from The Eastman Company (October 9, 1942)
- A judgment against the Eastman Company to the United States of America (recorded May 1, 1943)

Chain 3

- New York Hotel Company purchased lot from A.B. Gaines (May 22, 1889)
- The Eastman Company purchased the lot from the New York Hotel Company (January 18, 1938)
- H. Grady Manning, et al., purchased the lot from The Eastman Company (October 9, 1942)
- A judgment against the Eastman Company to the United States of America (recorded May 1, 1943)

Chain 4

- A.B. Gaines purchased the lot from M.A. McCrary (May 10, 1893)
- A Commissioner's deed transferred ownership from Defendants George W. Gates and George W. Gates, Executor of the Estate of Mattie A. McCrary to the Arkansas National Bank of Hot Springs (January 27, 1936)
- Charles W. and Monica Hoblick purchased the lot from the Arkansas National Bank of Hot Springs (January 28, 1937)
- The United States of America obtained the lot from the Hobliks (February 14, 1944)

Chain 5

- George R. King purchased the property from James R. Pierce (March 30, 1898)
- George R and Eugenie L. King purchased the lot from James R. Pierce (April 5, 1933)
- Lewis H. Palmer purchased the lot from Eugenie L. King (April 10, 1933)
- Lee Cazort obtained the lot from Alfred R. King (February 25, 1941)
- Elmer H. Gourley obtained the lot from Alfred F. King, Executor under the will of George R. King, deceased (June 3, 1941)
- Kenneth and Elizabeth Schweer purchased the lot from Elmer H. Gourley (June 3, 1941)
- The United States of America obtained the lot from the Schweers (November 13, 1943)

3.2 PAST USES AND OPERATIONS

The earliest historical source for the Site obtained for the ECP, a 1890 Sanborn fire insurance map, shows the Site divided into six parcels, occupied by: a boarding house in the northwest parcel, a Hotel Eastman and house in the southwest parcel, a dwelling and a portion of a wood pile on the south-central parcel, and a wood pile on the remaining three parcels. The Hotel Eastman building was documented as containing a carpenter shop, a bath house, a workshop, and two engines. The 1892 Sanborn map shows similar Site conditions except for the dwelling noted in the 1890 Sanborn map which was attached to the boarding house now identified as McCrary's Boarding House.

The 1896 Sanborn map identifies the Hotel Eastman building as containing a carpenter shop, a bath house, a repair shop, a boiler house, and the Engine and Dynamo room. Map symbols in the Hotel Eastman Building were similar to the 1890 and

1892 maps indicating that the boiler house and Engine and Dynamo rooms were part of the original construction. The Eastman Hotel featured steam heat and electric lighting when it opened on January 1, 1890.

The 1901 and 1908 Sanborn maps show the McCrary Hotel and Hotel Eastman Bathhouse on the western-most portion of the Site. The other four parcels were vacant. The 1915 Sanborn map also shows the Hotel Eastman Bathhouse and the McCrary Hotel. A small structure is noted in approximately the center of the other four parcels. The 1925 Sanborn map shows the McCrary Hotel and Hotel Eastman Bathhouse on the western portion of the property. In the northern portion of the south-central parcel, the laundry for the Hotel Eastman is shown. USAR personnel indicated that when the former gymnasium was demolished, concrete supports for the former washing machines were uncovered and subsequently removed. A small structure was south of the laundry.

As described in *A Chronology of Hot Springs Events*, the military took over the Eastman Hotel as an annex of the Army-Navy Hospital from October 1943 to June 1954, when the Army was ordered to evacuate the building. In the 1950 Sanborn map, the Former Eastman Hotel is noted as U.S. Government property and the McCrary Hotel has been replaced with a building that covers the northwestern and north central parcels for U.S. Government occupancy (Administration Building constructed in 1944). A dwelling is noted in the northeastern-most parcel. USAR personnel stated Military Police may have lived in the dwelling. The bathhouse remained in the southwestern parcel, and although the structure housing the former Hotel Eastman laundry is shown, the laundry is not depicted. A tank is shown in the south-central parcel. There is no listing for the Site in the 1946, 1951, 1958, 1960, 1961, or 1966 city directories.

The Eastman Hotel (the hotel name was listed on different documents as either the Hotel Eastman or the Eastman Hotel) was demolished in November 1958, according to *A Chronology of Hot Springs Events*. A 1962 city directory lists the Site used by the City Police Department and U.S. Navy Electronics Facility. The 1964 city directory lists the Site use as City Offices — Police Department, Government Offices — Defense Department, and Navy Elects Facility. USAR personnel confirmed that the facility had been used as a police station previously.

The 1968 city directory lists the Site use as a U.S. Navy Training Facility. The 1968 Sanborn map shows the building in the northwestern and north-central portions of the property. A dwelling with garage is noted in the northeastern-most parcel. The former bathhouse is no longer shown in the southwestern most portion of the parcel, and an area of miscellaneous storage is noted in the northernmost half of the south-central parcel. The 1969 and 1970 *Polk's City Directories* list the Site use as U.S. Navy Training Facility and USAR Center. The 1974 and 1984 aerial photographs depict a similar layout of buildings on the property, although it is not clear if the dwelling remains on Site.

The *Polk's City Directories* list the USAR as occupying the Site from 1971 to 2005. Important events in the USAR Center's development, administration, and mission are summarized in Table 1.

Year	Description
1943	U.S. Government obtains three lots (Eastman Hotel) to expand facilities at the Army-Navy Hospital
1944	U.S. Government obtains the fourth lot
1947	U.S. Government obtains the last lot of the parcel
1959	Hospital operations ceased. Army ordered to evacuate the building
1962	Police Station and U.S. Navy Electronic Facility
1964	City Offices including Police Department and Government Offices, and Navy Elects Facility
1971 to present	U.S. Army Reserve Center

The USAR (90th RRC) 489th Engineering Battalion Company, Combat Mechanized Engineers uses the Site for training Reserve personnel in escape, evasion, land navigation, and other common soldier skills. Training is also provided on the use of cargo vehicles, installation and removal of objects, and practice hauling missions.

Historical topographic maps and aerial photographs provide information about the Site and surrounding area. Figures 3, 4, 5, and 6 in Appendix A present topographical maps of the Site and surrounding area dated 1894, 1912, 1966, and 1976, respectively. Figures 7 through 11 present aerial photographs of the Site and surrounding areas dated 1940, 1974, 1984, 1994, and 2001, respectively.

Pertinent observations on the historical USGS topographic maps are summarized below.

- **1894 and 1912 (Figures 3 and 4).** These figures were produced at a scale that does not allow for any site-specific observations. The Site property is shown within the Hot Springs city limits.
- **1966 and 1976 (Figures 5 and 6).** This figure shows the USAR Center building, the Hot Springs Rehabilitation Center, the federal building, and St. Luke's Episcopal Church.

Pertinent observations on the historical aerial photographs are summarized below.

- **1940 (Figure 7).** This figure shows the Site with individual buildings on it. Based on information obtained from the Sanborn maps, the buildings are the former McCrary Hotel (northwest corner), Hotel Eastman Bathhouse (southwest corner), and Hotel Eastman laundry (south-central parcel). The photograph shows a small structure in the northeast portion of the Site. The Army-Navy Hospital is visible to

the north and the Eastman Hotel is visible to the west. St. Luke's Episcopal Church is southwest of the Site. The properties to the east appear to contain individual buildings. The western portion of the property to the south appears vacant and a structure is present on the eastern portion.

- **1974 and 1984 (Figures 8 and 9).** These aerial photographs show the Site, adjacent properties, and the surrounding area in the same configuration as observed during the August 2, 2006 Site reconnaissance, except for a small structure noted on the eastern portion of the southern adjoining property. That area was vacant during the Site reconnaissance.
- **1994 and 2001 (Figures 10 and 11).** These aerial photographs show the Site, adjacent properties, and the surrounding area in the same configuration as observed during the August 2, 2006 Site reconnaissance.

3.3 PAST USE, STORAGE, DISPOSAL, AND RELEASE OF HAZARDOUS SUBSTANCES

Information related to the past use and storage of hazardous substances at the Site was compiled through review of available Site records, search of federal and state environmental databases, and interviews with USAR personnel.

3.3.1 Past Use and Storage of Hazardous Substances

No information is available on whether the Eastman Hotel laundry performed dry cleaning services. In addition, the Dynamo engine used to provide electricity to the hotel may have used oils and a fuel source for operation. The storage or disposal of these substances is not known.

Chemicals formerly used and stored at the Site were associated with vehicle and facility maintenance activities and janitorial services. A 1998 Historical Architectural Report contained a map dated June 7, 1989 (Figure 17 of Parsons Engineering Science's 1998 report in Appendix D). That map shows areas where hazardous substances may have been used and/or stored (TEJV location description provided in parentheses):

- 1 — Grease Rack (adjacent to the vehicle wash rack [VWR] and south of the maintenance shop)
- 2 — VWR (adjacent to the grease rack and south of the maintenance shop)
- 3 — Underground Storage Tank [UST] (southeast of the maintenance shop)
- 4 — Drum Storage Shed (southeast of the maintenance shop near the UST)
- 5 — Petroleum, Oil, and Lubricants (POL) Room (southeast of the maintenance shop)

- 6 — Parts Cleaner (northeast corner of the maintenance shop)
- 7 — Brake Changing Area (location varies)
- 8 — Battery Room (southwest portion of the maintenance shop)

Certain types of chemical products used and stored at the Site would have contained CERCLA hazardous substances and would have been stored on a rotational basis in amounts necessary to support the unit through direct-support-level maintenance. However, there is no indication that CERCLA hazardous substances were stored at the Site for one year or more in excess of corresponding RQs.

3.3.2 Past Disposal and Release of Hazardous Substances

Information related to past disposal and potential release of hazardous substances at the Site was compiled through review of available Site records, search of federal and state environmental databases, and interviews with USAR personnel. According to USAR personnel and Site records, the disposal of hazmat or hazardous wastes has not occurred at the Site.

As indicated in Section 3.3.1, a 1989 figure contained in a 1998 Historical Architectural Report reflected the presence of a VWR south of the maintenance shop. A grease rack was adjacent to the VWR to the west. The location of the VWR was evident during the August 2, 2006 Site visit, and an oil-water separator (OWS) is associated with the VWR. According to USAR personnel, the original VWR had no OWS and it discharged directly to the sanitary sewer. In 1998, the connection to the sanitary sewer was permanently plugged and vents were added to the OWS. The ground surface surrounding the OWS is concrete, and no staining was observed during the Site visit. As needed, the OWS is reportedly pumped out by Safety-Kleen.

Also noted on the 1989 map is the existing POL storage room attached to the east side of the maintenance shop. In addition, the 1989 map shows a parts cleaner in the northeast corner of the maintenance shop and a battery storage area in the southwestern corner of the maintenance shop. The parts cleaner was observed during the Site reconnaissance, but the battery storage area was not evident. The floor of the maintenance shop was observed to be in good condition with no stains. USAR personnel stated the previous parts washer was a Safety-Kleen unit with solvents removed by Safety-Kleen, while the current unit is an Inland Technologies double-filtered unit with long-life Breakthrough solution. The filters, sludge, and solution in the current parts washer unit are currently disposed through the Army Defense Reutilization and Marketing Outlet.

Gravel fill from the City of Hot Springs gravel pit was used at the Site when the former gymnasium/Hotel Eastman building was removed in 1990. No stained soil or stressed vegetation on the Site was observed during the August 2, 2006 Site visit. The military equipment parking (MEP) area and privately owned vehicle parking area had signs

of minor staining and/or discoloration which were all considered *de minimis*, and no noxious or foul odors were noted.

3.4 PAST BULK PETROLEUM STORAGE TANKS

Evidence of previous bulk petroleum aboveground storage tanks (ASTs) was not identified during the ECP. According to USAR personnel, a former fuel UST is located beneath the flammable materials storage building. The tank has a 5,000-gallon capacity and was closed in place because of its proximity to the building, which prohibited removal. Soil samples were collected to confirm that soil was not impacted above state actions levels, and a 1998 letter from the Arkansas Department of Pollution Control and Ecology (ADPC&E), now the Arkansas Department of Environmental Quality (ADEQ), required no further action.

3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

A review of Site records produced several reports pertaining to the Site. The following subsections provide a brief summary of those reports. Copies of the reports, unless otherwise specified, are in Appendix D. Only pertinent sections of reports that addressed multiple sites are presented in Appendix D.

3.5.1 Environmental Baseline Survey Report

In February 2005, Environmental, Compliance & Construction, Inc. (ECCI) prepared for the USAR, 90th RRC, an *Environmental Baseline Survey* (EBS) of the USAR Center. The EBS provides summary and general information about the Site. "In accordance with the ASTM Standard D5746-98 for *Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities*", ECCI classified the Site as an ECP Area Type 7 Property. An ECP Area Type 7 Property is an area or parcel of real property that is unevaluated or requires additional evaluation.

3.5.2 Architectural Assessment Report

Parsons Engineering Science, Inc., performed a *Historic Architectural Resources Assessment of the 90th Regional Support Command Facilities in Arkansas* for the Department of the Army, 90th RRC, Office of the Engineer. The findings of the assessment were compiled in a report issued February 1998. The report concluded that the Administrative Building on the Site was not eligible for placement on the National Register of Historic Places because it could not be restored to its original appearance due to a brown stucco-like material applied to its exterior that could not be removed. No further architectural surveys were recommended for this Site. The Arkansas State Historic Preservation Officer concurred with the report recommendation that the Site was not eligible in a letter dated August 25, 1997. The Architectural Assessment Report contained a map dated June 7, 1989, which is discussed in Section 3.3.1 (Figure 17 of the 1998 Parsons Engineering Science report is provided in Appendix D).

3.5.3 Lead-Based Paint

ETC Engineers, Inc. performed an assessment of LBP at the USAR Center with the results reported in the *Report of Findings, Lead-Based Paint and Ozone Depleting Chemicals Assessment and Management* (1994). The assessment noted that the general condition of the paint in public or general use areas was good. Visible signs of paint cracking and chipping were not observed. Laboratory analysis identified 17 areas containing LBP:

1. Door #1 in Room 122
2. Door Jamb #1 in Room 122
3. Door #1 in Room 123
4. Door Jamb #1 in Room 103
5. Door #2 in Room 103
6. Door Jamb #2 in Room 103
7. Door #3 in Room 103
8. Door #1 in Room 105
9. Door #1 in Room 132
10. The column in Room 201
11. The partition in Room 202
12. The toilet door in Room 202
13. Wall #3 in Room 202
14. Door #1 in Room 206
15. The column in Room 205
16. Exterior door #1
17. Exterior stair handrail

3.5.4 Radon Reports

An October 4, 1993, memorandum entitled Asbestos/Radon Test Results, states the facility was tested for radon from March 20 to November 14, 1989. The results ranged from 0.20 to 2.9 picocuries per liter (pCi/L). The February 2005 EBS reported that "Survey kits were placed at approximately 2,000-square-foot intervals. No levels above 4 pCi/L were found."

3.5.5 Asbestos Reports

An October 4, 1993, memorandum from the Department of the Army, Headquarters 122D USAR Command issued copies of asbestos testing for the Site. The memorandum, which is not legible, included the results of 46 asbestos samples. The document noted that the identified asbestos-containing material (ACM) was abated after the sampling.

An asbestos building inspection was performed on December 3, 1996, by the Environmental Section of the 90th Regional Support Command. The results were summarized in an *Asbestos Building Inspection, Hot Springs U.S. Army Reserve Center, Hot Springs, Arkansas* dated January 1997. No friable asbestos was identified. Floor tile mastic in the maintenance shop bathroom of the USAR Center tested positive for

asbestos. The material was non-friable and was in good condition at the time of the inspection.

3.5.6 Threatened and Endangered Species Report

Parsons Engineering Science, Inc. performed an investigation and issued a *Final Phase 2 Threatened and Endangered Species Habitat Analysis of the 90th Regional Readiness Command (RRC) Facilities* for the Department of the Army, 90th RRC in August 2005. The Phase 2 analysis indicated that there was no suitable habitat for listed species on the Site because of prior and existing land use. The facility was selected for a Phase 2 analysis during Phase 1 because of its proximity to the Hot Springs National Park.

3.5.7 Cultural Resources Report

Parsons Engineering Science, Inc. performed an assessment and prepared a *Management Summary, Cultural Resources Assessment of 90th Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas* for the Department of the Army, 90th RRC. The assessment was compiled and issued February 1998. The assessment concluded that there were no architectural or archeological issues at the Site. The Site has a "low" archeological potential and is not eligible for the National Register of Historic Places.

3.5.8 Polychlorinated Biphenyls Report

The U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) performed a *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97* for the 90th RRC. The assessment was compiled and issued on September 30, 1997. The report noted that the electrical service transformer is located off government property. However, fluorescent lighting fixtures inside the building were identified as containing PCB-contaminated ballasts.

3.5.9 UST Closure Reports

A 5,000-gallon UST containing fuel was formerly located beneath the flammable materials storage building. The USAR contracted RMI Inc. to close the tank, as detailed in a 1998 permit, associated analytical results, and a letter from the ADPC&E (RMI, 1998). The tank was filled in place with a sand slurry on July 13, 1990. Two soil samples collected to confirm that soil was not impacted above state actions levels indicated: total petroleum hydrocarbons concentrations of 245 milligrams per kilogram (mg/kg) and 142 mg/kg; and total benzene, toluene, ethyl benzene, and xylenes concentrations of 0.5 mg/kg and 0.3 mg/kg. The ADPC&E issued a letter on November 20, 1998, requiring no further action.

4.0 ADJACENT PROPERTIES

Figure 11 in Appendix A provides a 2001 aerial view of the Site and adjacent properties. The property is bounded by Reserve Avenue and the Hot Springs Rehabilitation Center to the north; a federal building and parking lot to the west; a vacant lot and Sentinel Record building to the south; and a residential area to the east. Table 2 provides a list of adjacent properties with their directional location from the Site. The zoning of the adjacent parcels is also listed in Table 2. The Hot Springs Rehabilitation Center is not zoned because it is a State-owned property.

Direction From Site	Name/Type of Property	Address	Zoning
West	Federal Building	3201 Federal Building	C1
North	Hot Springs Rehabilitation Center	105 Reserve Street	Not Zoned
East	Vacant Lot	Reserve Street	R4
East	Residence	401 Spring Street	R4
South	Vacant Lot	316/318 Spring Street	C1
South	Sentinel Record	300 Spring Street	C1

Appendix A provides historical aerial photographs and topographic maps, and Appendix E presents an environmental database report that was used to evaluate potential environmental impacts from adjacent and nearby properties that may have also impacted the environmental conditions at the Site. Land use at the adjacent properties does not appear to have changed significantly over the years and does not appear to have impacted the environmental conditions of the USAR Center.

5.0 REVIEW OF REGULATORY INFORMATION

A component of the ECP is the review of all reasonably obtainable federal, state, and local government records for the Site and surrounding properties where there has been a release or likely release of any hazardous substance or any petroleum product and that are likely to cause or contribute to a release or threatened release of any hazardous substance or any petroleum product on the federal real property. An environmental database summary report was obtained from EDR on July 19, 2006. The environmental database summary consolidates standard federal, state, local, and tribal environmental record sources based on ASTM-recommended minimum search distances from the Site. A copy of the complete EDR report is included in Appendix E.

The facility is a conditionally exempt small-quantity generator (CESQG) under the Resource Conservation and Recovery Act (RCRA). No environmental permits have been issued for the Site; therefore, permit applications or associated permit documentation were not available for review. The Site has not participated in the Installation Restoration Program, Military Munitions Response Program, or a Compliance Cleanup program.

TEJV interviewed local authorities and reviewed reasonably accessible USAR environmental documents, ADEQ files, city of Hot Springs records, and historical aerial photographs and maps to investigate environmental conditions at the Site and surrounding area. Available information on and the potential impact of environmental conditions on the Site were each assessed.

TEJV conducted multiple interviews with relevant personnel to discuss general environmental interest and specific areas of interest identified during the records review and visual reconnaissance. Section 9.0 of this report identifies the individuals interviewed with respect to conditions and operations at the Site and the information from those interviews has been incorporated into this report.

The interviews included topics of general environmental interest and specific areas of interest identified during the records review and visual Site reconnaissance. Pertinent information from these interviews is incorporated into this report.

5.1 FEDERAL ENVIRONMENTAL RECORDS

5.1.1 Federal National Priorities List Sites within One Mile

The National Priorities List (NPL) is a subset of the CERCLA Information System (CERCLIS) and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites are targeted for long-term remedial action under CERCLA. According to the environmental database report, the USAR Center is not an NPL site and there are no such sites within one mile of the Site.

5.1.2 Federal CERCLIS Sites within One-Half Mile

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies, and persons, pursuant to Section 103 of the Act. CERCLIS contains sites that are either proposed to be or are on the NPL, and sites that are in the screening and assessment phase for possible inclusion on the NPL. According to the environmental database report, the USAR Center is not a CERCLIS site and there are no CERCLIS sites within one-half mile of the Site.

CERCLIS No Further Remedial Action Planned (NFRAP) sites have been removed and archived from CERCLIS sites. NFRAP status indicates that, to the best of USEPA's knowledge, assessment at a site has been completed and that no further steps will be taken to list this site on the NPL, unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with the site; it means that, based on upon available information, the location is not judged to be a potential NPL site. According to the environmental database report, the USAR Center is not a CERCLIS NFRAP site and there are no CERCLIS NFRAP sites within one-half mile of the Site.

5.1.3 RCRA Corrective Action Sites within One Mile

RCRA Corrective Action (CORRACTS) represent facilities that have generated or managed hazardous wastes and require corrective action. According to the environmental database report, the USAR Center is not a CORRACTS site and there are no CORRACTS sites within one mile of the Site.

5.1.4 RCRA Transport, Treatment, Store, and/or Disposal Facilities within One-Half Mile

The RCRA Information (RCRAInfo) Database includes selective information on sites that generate, transport, and treat, store, and dispose (TSD) of hazardous waste, as defined by RCRA. According to the environmental database report, the USAR Center is not a RCRA TSD site and there are no RCRA TSD sites within one-half mile of the Site.

5.1.5 Federal RCRA Small- and Large-Quantity Generators List within One-Quarter Mile

CESQGs generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. RCRA small-quantity generators (SQGs) are defined as facilities generating between 100 kg and 1,000 kg of hazardous waste per month, while a large-quantity generator (LQG) is defined as a facility generating more than 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month. According to the environmental database report, the USAR Center is a RCRA CESQG.

As summarized in Table 3, six RCRA SQGs are within one-quarter mile of the Site. The RCRAInfo database did not list violations for the six sites. The RCRA SQG sites are considered to represent a low risk to the Site due to the geology and topography of the area. No RCRA LQGs were identified within one-quarter mile of the Site.

Table 3 RCRA Small Quantity Generator Sites within One-Quarter Mile				
Company/Site	Address	Distance and Direction from Site	Violation Status	Elevation Relative to Site
Southwestern Bell	220 Prospect Avenue	1,107 feet, West-southwest	No violations found	Higher
Hot Springs Rehabilitation Center	105 Reserve Avenue	541 feet, West	No violations found	Lower
Craighead Laundry-Cleaners, Inc.	225 Malvern Avenue	739 feet, Southwest	No violations found	Lower
Pathology Services, Inc.	100 Bridge Street, Suite 35	744 feet, Southwest	No violations found	Lower
Hale Bathhouse	341 Central Avenue	1,167 feet, North-northwest	No violations found	Lower
Superior Bathhouse	329 Central Avenue	1,234 feet, North-northwest	No violations found	Lower

5.1.6 Federal Emergency Response Notification System List

The federal Emergency Response Notification System (ERNS) provides information on reported releases of oil and hazardous substances. According to the environmental database report, the USAR Center is not listed on the ERNS List.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented below was obtained from the environmental database report. Supplemental information was also provided from research at ADEQ.

5.2.1 State-Registered Landfills or Solid Waste Disposal Sites within One-Half Mile

According to the environmental database report, no solid waste landfills, incinerators, or transfer stations are within one-half mile of the USAR Center, nor are they present on the Site.

5.2.2 State-Registered Leaking UST Sites within One-Half Mile

According to the environmental database report, two leaking UST (LUST) sites are located within one-half mile of the USAR Center. One of the listed facilities is a Ryder Truck Rental facility at 212 Spring Street. This LUST site is approximately 303 feet west-southwest of

the Site and at a lower topographic elevation. According to the environmental database report, a dispenser froze in January 1996 and approximately 50 gallons of product were released to the ground surface. Impacted soil was removed and contained in approximately 20 55-gallon drums. An investigation was completed in June 1996 and a no further action letter generated based on the analytical results. This LUST site is considered to represent a low risk to the Site due to its distance and lower elevation.

The second listed LUST facility is All Care Pharmacy at 922 Central Avenue. This LUST site is approximately 1,729 feet south-southwest of the Site and at a lower topographic elevation. According to the environmental database report, contaminated soil and groundwater were encountered during closure of abandoned tanks at this former service station. A site assessment was conducted in June 2000, and no additional work was requested. The monitoring wells were abandoned and a no further action letter was generated on July 20, 2000. This LUST site is considered a low risk to the Site due to its distance and lower elevation.

5.2.3 State-Registered UST Sites within One-Quarter Mile

USTs are regulated under RCRA Subtitle I and must be registered with the state department responsible for administering the UST program. The environmental database report identified four state-registered UST sites within one-quarter mile. The listed facilities are summarized in Table 4.

5.2.4 State Hazardous Waste Sites within One Mile

According to the environmental database report, no hazardous waste sites are within one mile of the USAR Center. The Site is not classified as a hazardous waste site.

5.2.5 State Solid Waste Illegal Dumps within One-Half Mile

According to the environmental database report, no illegal dumps have been identified within one-half mile of the USAR Center. There is no illegal dump on the Site.

5.2.6 State AST Sites within One-Quarter Mile

According to the environmental database report, there are no state-registered ASTs on or within one-quarter mile of the USAR Center.

5.2.7 State Emergency Response Incidents Sites

According to the environmental database report, the USAR Center is not listed on the Arkansas emergency response incidents list.

Table 4
Registered UST Sites within One-Quarter Mile

Company/Site	Address	Distance and Direction from Site	Status	Elevation Relative to Site
Ryder Truck Rental	212 Spring Street	303 feet, West-southwest	A 1,000-gallon gasoline UST was taken out of service on November 26, 1991, an 8,000-gallon diesel UST was taken out of service on May 11, 1997, and an 8,000-gallon diesel UST was taken out of service on May 10, 1997.	Lower
Hot Springs Rehabilitation Center	105 Reserve Avenue	541 feet, West	Two 1,504-gallon gasoline USTs were taken out of service on 12/27/98, and one 1,200-gallon gasoline UST was taken out of service on June 14, 1993.	Lower
Lee Beasley LLL	300 Exchange	820 feet, West	Two 1,000-gallon gasoline USTs were taken out of service on July 15, 1996.	Lower
Hot Springs Traffic Department	328 Gulpha	1,252 feet, East-southeast	One 10,000-gallon gasoline UST was taken out of service on January 3, 1996. Two 1,000-gallon USTs containing unknown material were taken out of service on September 14, 2001.	Lower

5.2.8 State-Registered Sites with Engineering or Institutional Controls within One-Half Mile

Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health. Institutional controls include administrative procedures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post-remediation care requirements intended to prevent exposure to contaminants remaining onsite. According to the environmental database report, there are no state-registered sites with engineering or institutional controls within one-half mile of the Site.

5.2.9 State Voluntary Cleanup Program Sites within One-Half Mile

Brownfields sites are included on the Superfund Voluntary Cleanup, Oversight, and Assistance Program listing. Also includes sites for which incentives have been offered by the state for remediating oil- and gas-related pollutants by participants, as long as they did not cause or contribute to the contamination. Applicants to the program receive a release of liability to the state in exchange for a successful cleanup. According to the environmental database report, there are no voluntary action program sites within one-half mile of the Site.

5.2.10 State Brownfields Program Sites within One-Half Mile

Included in the state Brownfields listing are brownfields properties addressed by Cooperative Agreement Recipients and brownfields properties targeted by Targeted Brownfields Assessments (TBAs). The TBA program is designed to assist states, tribes, and municipalities in minimizing the uncertainties of contamination often associated with brownfields. Under the TBA program, USEPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. TBAs supplement and work with other efforts under USEPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. According to the environmental database report, there are no State brownfield sites within one-half mile of the Site.

5.2.11 State Enforcement Sites

According to the environmental database report, the USAR Center is not listed on the enforcement list.

5.2.12 State Poultry Sludge Permit Sites within One-Half Mile

According to the environmental database report, there are no poultry sludge permit (Sludge) sites within one-half mile of the Site. According to the environmental database report, the USAR Center is not listed on the Sludge list.

5.2.13 State Permit Data System

According to the environmental database report, the USAR Center is not listed on the state permit data system.

5.2.14 State Facility Emission and Stack Data Sites

According to the environmental database report, the USAR Center is not listed on the facility emission and stack list.

5.2.15 State Asbestos Notification of Intent Database Sites

According to the environmental database report, the USAR Center is not listed on the asbestos database.

5.2.16 State-Registered Historical Towngas Sites within One Mile

The Garland Gas and Light Company, also called the Hot Springs Water Co., is located approximately 1,092 feet south of the Site on Valley Street, according to the environmental database report.

5.3 TRIBAL ENVIRONMENTAL RECORDS

There are no identified Indian Reservations identified within one mile of the Site, according to the environmental database search.

5.4 UNMAPPED SITES

The environmental database search yielded 27 unmapped sites. Unmapped sites are those with address information sufficient only to identify the location within the zip code of the target Site. Every effort was made to locate these sites and assess their relevance to this ECP report. Further research was conducted using maps of the Site and surrounding areas. None of the unmapped sites were estimated to be within the corresponding ASTM minimum search distance for the databases on which they are listed.

5.5 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO SITE

During review of environmental information summarized in this section, multiple databases and sites were reviewed to evaluate potential risks to the Site. Two LUST sites were identified as potential risks to the Site, as detailed in Section 5.2.2. Based on an evaluation of available information and details concerning the identified sites, both sites are considered low risks to the Site. No "High Risk" sites were identified. "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at the Site.

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

Findings documented in the following subsections are based on the August 2, 2006 Site visit and area reconnaissance, a review of available Site records, and information obtained from USAR personnel.

6.1 UNDERGROUND STORAGE TANKS/ABOVEGROUND STORAGE TANKS

A closed-in-place fuel UST remains on the Site. The 5,000-gallon UST is located beneath the flammable materials storage building. The tank was filled in place with a sand slurry on July 13, 1990 (RMI, 1998). The ADPC&E issued a letter on November 20, 1998, stating no further action was required.

No ASTs were observed on the Site.

6.2 INVENTORY OF CHEMICALS/HAZARDOUS SUBSTANCES

Janitorial chemicals are generally stored in the janitorial closet, but cleaning supplies were observed in other rooms of the facility, including the Rehabilitation Center Thrift Store. Antifreeze and Breakthrough (Naphthol Spirits) are stored in 55-gallon drums in the POL room. Also stored in the POL room are spray paints, degreasers, and cases of motor oil. Paint in 5-gallon buckets were observed in rooms on the first floor. Engine oil and antifreeze in 55-gallon drums were observed in the hazmat storage shed. Used oil is stored in a 55-gallon drum in the hazmat storage shed. There is no evidence that hazardous substances above RQs were stored for one year or more, released, or disposed at the Site.

No pesticides were observed on the Site. USAR personnel indicated that pesticide control is provided by a contracted service.

6.3 WASTE DISPOSAL SITES

Solid waste is picked up by the City of Hot Springs Sanitation Department and disposed of at the City of Benton Landfill, Permit Number S0195.

6.4 PITS, SUMPS, DRY WELLS, AND CATCH BASINS

The USAR Center operates one OWS on the south side of the maintenance shop. The OWS receives wash/rinse water from the VWR, which is used to military vehicles and equipment. The VWR has a canopy and curbing/speed reducers to reduce the inflow of storm water. EnSafe performed an evaluation of the OWS system in October 1999. The OWS, installed in 1995, consists of a 575-gallon, in-ground, double-walled cylindrical vessel rated for a maximum flow of 35 gallons per minute (gpm). The gravity flow system is designed to produce 15 gpm or less of free oil in the effluent. EnSafe documented numerous upgrades to the OWS which had been completed in an effort to prevent overflow of the system during washing events. The discharge was covered under the city's sewer

use ordinance, which limited the concentration of oil and grease in the effluent to 150 milligrams per liter. No monitoring or reporting is required.

Despite the upgrades, the OWS continued to overflow during washing events. According to USAR personnel, the original VWR had no OWS and it discharged directly to the sanitary sewer. In 1998, the connection to the sanitary sewer was permanently plugged and vents were added to the OWS. The ground surface surrounding the OWS is concrete, and no staining was observed during TEJV's Site visit. As needed, the OWS is pumped by Safety-Kleen; it was last pumped out on May 8, 2006.

There is a grease trap outside the kitchen; however, the kitchen was not in use during TEJV's Site visit.

On the eastern side of the property are three storm water drains: two are on the northern side of the retaining walls and one storm drain is in the southeastern-most corner of the property. The storm drains discharge to the storm water sewer.

Floor drains in the restrooms and kitchen collect condensate from the chillers/refrigerators and facilitate floor cleaning. Drains are also located in the current platoon storage area, where refrigerators and freezers were historically located. The floor drains discharge into the public sanitary sewer that serves the Site.

6.5 ASBESTOS-CONTAINING MATERIAL

The *Asbestos Building Inspection* report prepared by U.S. Army 90th RRC (1997) identified nonfriable asbestos in the floor tile mastic in the maintenance shop bathroom. USAR personnel stated that the tile in the restroom was redone and that all of the asbestos in the building had been abated. Documentation of the removal of the floor tile mastic was not available.

6.6 PCB-CONTAINING EQUIPMENT

A PCB assessment was conducted in 1997 by the USACHPPM and fluorescent light ballasts were noted as containing PCBs. According to USAR personnel, all of the light ballasts have been replaced. There are no transformers on the Site. According to USAR personnel, all used fluorescent tubes are sent offsite for recycling.

6.7 LEAD-BASED PAINT

Buildings constructed before the DoD ban on the use of LBP in 1978 are presumed to contain LBP. The Administration Building at the USAR Center was completed in 1944 and it is presumed to contain LBP.

As described in the *Report of Findings, Lead-Based Paint and Ozone-Depleting Chemicals Assessment and Management* (ETC Engineers, Inc., 1994), a LBP survey was conducted and 17 areas of LBP were identified. Section 3.5.3 presents the LBP results of this report. During the August 2, 2006 Site reconnaissance, peeling paint was observed in the kitchen area, but LBP was not detected at that location in 1994.

In addition, old existing water supply lines may be constructed of lead. Drinking water outlets at the Site were sampled by USAR personnel for lead and copper on October 14, 1992. The samples were submitted to Environmental Enterprise Group, Inc., for laboratory analysis. The results were below their respective federal treatment technique action levels.

6.8 RADON

Garland County is in the USEPA Radon Zone 2, which has an indoor average level of between 2 pCi/L and 4 pCi/L. Seventeen sites were tested in the 71901 zip code of the Site. The results averaged 1.624 pCi/L, with a maximum of 4.550 pCi/L.

As described in an October 4, 1993, memorandum entitled *Asbestos/Radon Test Results*, the Site was tested for radon from March 20 to November 14, 1989. The results ranged from 0.20 pCi/L to 2.9 pCi/L. The USEPA-recommended residential action level for radon is 4.0 pCi/L.

6.9 UNEXPLODED ORDNANCE

Explosive hazards were not identified at the Site. ADEQ files for the USAR Center contain documentation of an emergency permit for the detonation of military ordnance issued January 12, 1994. However, the ordnance was applicable to the former Southwestern Proving Ground near Hope, Arkansas, and not for the Hot Springs USAR Center. No evidence was found during the Site reconnaissance or records review process of the presence of munitions and explosives of concern. Firearms are stored in a secure arms storage vault.

6.10 RADIOACTIVE MATERIALS

Radiological materials are used in M-8 chemical alarms that are stored on the Site in the north-central portion of the basement in the Nuclear, Biological, and Chemical (NBC) agent cage. Although the radiation sources were not present in the chemical alarms during the Site visit, USAR personnel indicated the radiation sources are stored on Site. The area storage room is identified with a placard. There is no evidence of any release of radiological materials at the Site.

6.11 OTHER IDENTIFIED CONCERNS

USAR personnel stated that, during heavy rainfall events, water seeps into the northeastern corner of the maintenance shop. The water then drains to the storm sewer system from that area by the easternmost drain in the maintenance shop. The road and sidewalk on the north side of the building are sloped toward the building, which causes the water to accumulate against the building.

The retaining walls for the terraces in the MEP area are deteriorating. A photograph provided in Appendix B shows cracks in the walls.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

The Site is zoned commercial. Surrounding properties are used for commercial or residential purposes.

7.2 COASTAL ZONE MANAGEMENT

No coastal zone management plan exists for Arkansas.

7.3 WETLANDS

According to the U.S. Fish and Wildlife Service Branch of Habitat Assessment, Wetlands Information Web site, <http://wetlandsfws.er.usgs.gov>, there are no jurisdictional wetland areas on the Site or adjacent properties, as shown on Figure 12. In addition, an unpublished map titled *Potential Wetlands and Farmed Wetlands Inventory*, dated February 11, 1991, was reviewed at the USDA Garland County office. No wetlands were observed on the Site. Except for a few grassy areas and landscaping limited to a flower bed near the Thrift Store, the Site is covered by concrete, asphalt, or building.

7.4 100-YEAR FLOODPLAIN

FEMA Flood Hazard Area map information included in the environmental database report indicates that the Site lies outside the 100-year floodplain. Review of the FEMA Flood Insurance Map (Figure 13) confirms that the Site is outside the 100-year floodplain.

7.5 NATURAL RESOURCES

A threatened and endangered species habitat analysis was performed by Parsons Engineering Science, Inc., in 2005. The survey determined that there was no suitable habitat for listed species because of prior and existing Site land use.

7.6 CULTURAL RESOURCES

An historical and architectural assessment was performed at the Site by Parsons Engineering Science, Inc. in 1998. The Administrative Building dates to the 1940s and was originally clad in red brick. In 1990, the brick was sandblasted and brown stucco material was applied changing the exterior appearance of the building. The stucco material is permanently affixed. Because of the loss of integrity, the building was not recommended for listing in the National Register of Historic Places. Concurrence from the Arkansas State Historic Preservation Office on the lack of eligibility was provided in the Parsons report (Parsons, 1998). Parsons also performed a cultural resources survey and no cultural resource issues were identified at the USAR Center.

8.0 CONCLUSIONS

TEJV, under contract to the USACE, Louisville District, has prepared this ECP Report for the Hot Springs USAR Center (Facility ID AR020), at 200 Reserve Street in Hot Springs, Garland County, Arkansas. The USAR Center is on 1.43 acres of land with three permanent structures: a 34,632-square-foot Administration Building, a 36-square-foot flammable materials storage structure, and a 108-square-foot hazmat storage building. The Site is currently occupied by the 489th Engineering Battalion Company, Combat Mechanized Engineers.

Findings of this ECP are based on existing environmental information, including visual observations, Site records, and federal, state, and local database and file information, related to the storage, release, treatment, or disposal of hazardous substances or petroleum products or derivatives on the property. The following present the findings related to areas evaluated during the ECP process.

- **Hazardous Substances.** Chemicals containing CERCLA hazardous substances would have historically been used and stored at the Site by the Army in amounts necessary to support unit-level vehicle and building maintenance activities. However, the quantities stored for one year or more would not have exceeded 1,000 kg or the RQ of designated hazardous substances, or one kg of acutely hazardous waste. There is no documentation as to whether the Hotel Eastman laundry performed dry cleaning services. Solvents, including Stoddard solvent and tetrachloroethylene, which were not observed during the Site visit, are commonly used to perform dry cleaning and have unique physical and chemical properties that allow them to migrate readily through media such as concrete, soil, and groundwater. In addition, use of oils and fuel for the Dynamo Room and the Kingsway Garage and Eastman Garages are not known.
- **USTs/ASTs.** A closed-in-place 5,000-gallon UST remains on the Site. The tank could not be removed because of its proximity to the Administrative Building. The ADPC&E issued a letter on November 20, 1998, stating no further action was required concerning closure of the UST.
- **Non-UST/AST Petroleum Storage.** Petroleum storage would have occurred in designated areas within the POL storage shed or hazardous materials storage.
- **PCBs.** There are no electrical service transformers on the Site. Fluorescent lighting fixtures were identified in the USACHPPM report (1997) as having PCB-containing ballasts. USAR personnel stated all fluorescent lighting fixtures had been replaced and used fluorescent tubes were sent offsite for recycling.
- **ACM.** The *Asbestos Building Inspection* report prepared by U.S. Army 90th RRC (1997) identified nonfriable asbestos in the floor tile mastic in the maintenance shop bathroom. USAR personnel stated that the tile in the restroom was redone and that

all of the asbestos in the building had been abated. Documentation of the removal of the floor tile mastic was not available.

- **LBP.** ETC Engineers, Inc., performed a LBP assessment at the USAR Center. Laboratory analysis of samples identified 17 areas of concern. The report recommended stripping of the paint in those areas followed by repainting. However, documentation of LBP stripping was not provided. Except for one area of peeling paint in the kitchen, painted surfaces at the Site were observed to be in good condition during the Site reconnaissance.
- **Radiological Materials.** Radiological materials are used in M-8 chemical alarms that are stored on the Site. The NBC agent cage located in the north central corner of the basement is identified with a placard. The radiation sources were not present in the chemical alarms during the Site visit. There is no evidence of any release of radiological materials at the Site.
- **Radon.** Site-specific radon testing in 1989 detected no levels above the USEPA-recommended residential action level of 4.0 pCi/L.
- **Munitions and Explosives.** No evidence was found during the Site reconnaissance or records review process of the past presence of munitions and explosives of concern. Firearms are stored in a secure arms storage vault. ADEQ files for the USAR Center contain documentation of an emergency permit for the detonation of military ordnance issued January 12, 1994. However, the ordnance was applicable to the former Southwestern Proving Ground near Hope, Arkansas, and not for the Hot Springs USAR Center.
- **Surrounding Properties.** Potential environmental sites of concern, located within corresponding ASTM minimum search distances from the Site, were evaluated. Land use at the adjacent properties does not appear to have changed significantly over the years and does not appear to have impacted the environmental conditions of the USAR Center.

Areas of potential environmental concern were reviewed and the TEJV found no significant concerns relating to the environmental condition of the Site. In accordance with DoD policy defining the classifications (see S.W. Goodman Memorandum dated October 21, 1996), the Site has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

9.0 REFERENCES

PERSONS CONTACTED

- Jennifer Ryals, City of Hot Springs Tax Assessor, (501) 622-3730.
- Cathy Sellman, Planning Director, City of Hot Springs (501) 321-6855.
- Bill Sexton, Facility Coordinator, Hot Springs USAR Center, (501) 623, 8931.
- Linda Carver, USDA, Garland County Farm Service Agency (501) 624-2574, extension 100.

RESOURCES CONSULTED

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- U.S. Environmental Protection Agency, Map of Radon Zones, <http://www.epa.gov/radon/zonemap.html>.
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Agencies Contacted

- City of Hot Springs Tax Assessor's Office
- Garland County Public Library
- U.S. Department of Agriculture, Garland County Farm Service Agency
- Arkansas Department of Environmental Quality

Appendix A
Figures

FIGURES

Figure 1	General Site Location Map
Figure 2	Site Layout Plan
Figure 3	1894 Topographic Map
Figure 4	1912 Topographic Map
Figure 5	1966 Topographic Map
Figure 6	1976 Topographic Map
Figure 7	1940 Aerial Photograph
Figure 8	1974 Aerial Photograph
Figure 9	1984 Aerial Photograph
Figure 10	1994 Aerial Photograph
Figure 11	2001 Aerial Photograph
Figure 12	Wetland Map
Figure 13	FEMA Flood Insurance Rate Map

Appendix B
Site Reconnaissance Photographs

Appendix C
Chain-of-Title Report

Appendix D
Previous Environmental Reports

PREVIOUS ENVIRONMENTAL REPORTS

1. Arkansas Department of Pollution Control and Ecology. Letter concerning: *In Place Closure of 1 Tank*. November 20, 1998.
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Appendix E
Environmental Database Report

**FINAL ENVIRONMENTAL CONDITION OF PROPERTY REPORT
HOT SPRINGS — U.S. ARMY RESERVE CENTER (AR020)
200 RESERVE STREET — HOT SPRINGS, ARKANSAS 71901
February 7, 2007**

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