

ENVIRONMENTAL CONDITION OF PROPERTY REPORT

**U.S. ARMY RESERVE CENTER (KY076)
Benjamin J. Butler Building
3600 Century Division Way
Louisville, Kentucky 40205**

Prepared For:

**U.S. Army Corps of Engineers – Louisville District
Engineering Division – Environmental Engineering Branch
600 Dr. Martin Luther King, Jr. Place
Louisville, Kentucky 40202-2232**

June 2007

ENVIRONMENTAL CONDITION OF PROPERTY REPORT SIGNATURE SHEET

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.

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



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EXECUTIVE SUMMARY

GEO Consultants, LLC, under contract to the U.S. Army Corps of Engineers (USACE) Louisville District, prepared this Environmental Condition of Property (ECP) report for the MG Benjamin J. Butler U.S. Army Reserve (USAR) Center (Facility ID KY076), which includes the Butler building and the organizational maintenance shop (OMS), hereafter referred to as the "Site" or "USAR Center". The Site is located at 3600 Century Division Way, Louisville, Jefferson County, Kentucky, 40205 and on a portion of an 11.641 acre tract.

This ECP Report was conducted in conformance with primary Department of Defense (DoD) and Army guidance, the DoD's Base Redevelopment and Realignment Manual (BRRM), DoD 4165.66-M, Army Regulations (ARs), and the American Society for Testing and Materials (ASTM) 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.

SITE DESCRIPTION & HISTORICAL USE

The subject USAR Center is located on a portion of an 11.641 acre tract with two permanent structures: the 56,290 square feet Butler Building and the 3,891 square feet former OMS. The USAR Center is currently occupied by the 100th Division (DIV) Headquarters. The U.S. Government originally leased the Site in 1972 for a USAR Center. In 1976, the U.S. Government filed an Amended Declaration of Taking and Amended Complaint of Condemnation on March 26, 1976. Per the Agreed Order from 1979, the U.S. Government owned this property since 1976.

Based on a review of aerial photographs, Sanborn Fire Insurance Maps, and U.S. Geological Survey (USGS) topographical maps dating back to 1960, the Site was owned by the Louisville and Jefferson County Air Board and used by the Kentucky National Guard and the U.S. Army. The Butler building was constructed in or after 1979 and the OMS building was constructed in the early 1960's.

AREAS ASSESSED FOR ENVIRONMENTAL CONCERN

Areas of potential environmental concern were reviewed and GEO Consultants, LLC found no environmental impacts relating to the USAR use of this property.

Environmental Condition of Property

In accordance with DoD policy defining the classifications (See Sherri Goodman Memorandum dated October 21, 1996), the Property has been classified as Category 1.

This classification does not include categorizing the property based on *de minimus* 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

ACBM	asbestos-containing building material
ACM	asbestos-containing materials
AR	Army Regulation
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
BRRM	Base Redevelopment and Realignment Manual
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CFR	Code of Federal Regulations
CORRACTS	RCRA Corrective Action
DIV	Division
DoD	Department of Defense
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
EEG	Environmental Enterprise Group, Inc.
ERNS	Emergency Response Notification System
FEMA	Federal Emergency Management Agency
IFR	indoor firing range
IT	Institutional Training
kg	kilogram
LBP	lead-based paint
LJCAB	Louisville and Jefferson County Air Board
MEC	munitions and explosives of concern
MEP	military equipment parking
NFA	no further action
NPL	National Priorities List
NRHP	National Register of Historic Places
O&M	Operations and Maintenance
OMS	organizational maintenance shop
PCBs	polychlorinated biphenyls
pCi/L	picoCuries per liter of air
POV	privately owned vehicle
RCRA	Resource Conservation and Recovery Act
RCRIS	RCRA Information System
RRC	Regional Readiness Command
RSC	Regional Support Command
Site	MG Benjamin J. Butler U.S. Army Reserve Center and OMS
TSD	treat, store, and/or dispose
USACE	U.S. Army Corps of Engineers

LIST OF ACRONYMS (continued)

USAR	U.S. Army Reserve
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
UST	underground storage tank
WSR	Wild and Scenic River

1.0 INTRODUCTION

GEO Consultants, LLC, under contract to the U.S. Army Corps of Engineers (USACE) Louisville District, Engineering Division, was authorized to conduct an Environmental Condition of Property (ECP) report for the MG Benjamin J. Butler U.S. Army Reserve (USAR) Center (Facility ID KY076), in response to the Base Realignment and Closure (BRAC) 2005 legislation. The facility is located at 3600 Century Division Way, Louisville, Jefferson County, Kentucky, 40205. Facility KY076 is part of what was previously known as the Major Benjamin J. Butler complex, which consists of three buildings; the Main Building (KY046), the Butler Building (KY076), and an organizational maintenance shop (OMS), which is also part of KY076. This report covers the Butler Building and the OMS, hereafter referred to as the "Site". In support of the ECP, site visits were conducted on August 10, 2006 and February 2, 2007. The purpose of the visits were to visually obtain information indicating the likelihood of recognized environmental conditions in connection with the Site.

1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY (ECP)

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) policy, set forth in the Base Redevelopment and Realignment Manual (BRRM) (DoD 4165.66-M, March 1, 2006) Section C8.3, 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 (USEPAs) "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, whichever is greater, of the substances specified in 40 CFR 302.4 or 1 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 reportable quantity. Army Regulation (AR) 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 (ASTM) Designation D 6008-96 (2005), Standard Practice for Conducting Environmental Baseline Surveys as a guideline when not inconsistent with the BRRM, CERCLA Section 120, ARs, and other applicable Army guidance.

1.2 SCOPE OF SERVICES

This ECP report covers the Butler Building and the OMS building of the USAR Center located at 3600 Century Division Way, Louisville, Jefferson County, Kentucky, 40205. The property is bounded by Cannons Lane and a golf course to the east, business and residential areas to the south, Bowman Field airport and hangars to the west and north. Site maps are provided in Appendix A. Appendix B provides photographs taken during the August 2006 and February 2007 site visits. Appendix C provides the chain of title information. Historical environmental documents and reports are provided in Appendix D. Appendix E contains the environmental database reports.

This ECP report classifies the property into one of seven DoD Environmental ECP categories as defined by ASTM Designation D5746-98 (2002), *Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities*. The property classification categories are as follows:

- ECP Area Category 1 – An area or parcel of real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).
- ECP Area Category 2 – An area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred.
- ECP Area Category 3 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.

- ECP Area Category 4 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, and all remedial action necessary to protect human health and the environment have been taken.
- ECP Area Category 5 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred and removal or remedial actions, or both, are under way, but all required actions have not yet been taken.
- ECP Area Category 6 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but required response actions have not yet been initiated.
- ECP Area Category 7 – An area or parcel of real property that is unevaluated or requires additional evaluation.

Areas classified as Area Categories 1 through 4, as defined in this classification, are suitable, with respect to CERCLA 120(h) requirements, for deed transfer to a non-federal recipient.

2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

2.1 SITE LOCATION

The USAR Center is located in the Western portion of Jefferson County, Kentucky, within the city limits of Louisville, Kentucky. The Site is located in a primarily residential area, with an airport located west and north of the property. Figure 1 in Appendix A provides a general site location map.

2.2 ASSET INFORMATION

Facility Name and Address: MG Benjamin J. Butler U. S. Army Reserve Center
(Facility ID KY076),
3600 Century Division Way,
Louisville, Kentucky, 40205

Property Owner: U.S. Government

Date of Ownership: March 26, 1976

Current Occupant: 100th DIV IT U.S. Army Reserve

Zoning: R-1, Single Family Use

County, State: Jefferson County, Kentucky

USGS Quadrangle(s): Louisville East

Latitude/longitude: 38° 13' 38.3" N; 85° 39' 11.9" W

Legal Description:

The USAR Center is referred to as "being that parcel or tract of land, known as Tract No. 100, situated and lying in the City of Louisville, Jefferson County, Commonwealth of Kentucky."

2.3 PHYSICAL DESCRIPTION

The subject USAR Center is situated on an 11.641-acre parcel of land and consists of two permanent structures: a 56,290 square-foot administration and training building, known as the Butler building, and a 3,890 square-foot OMS building. This parcel of property also includes a Main Building (Facility ID KY046), which is not subject to the BRAC05 closure action and this ECP report, is located east of the OMS and north of the Butler building.

The Butler Building is a two-story, concrete post and beam, rectangular building built in 1979 or later. The facility has brick veneer with four narrow vertical windows between the bays with a fixed pane above and awning pane below, with the exception of the leftmost two on the façade. There are two additions on the left side of the structure. The forward addition is a long and narrow, one story structure with inset blank brick walls, formerly the indoor firing range. The rear addition is one and one-half stories tall and has blank, brick veneer walls. It has a large garage door on its rear. The facility is built on a concrete slab (Photographs No. 1 and No. 2, Appendix B).

The former OMS, currently used for storage, is a small one story building, constructed in the early 1960's, adjacent to both the Main building (KY046) and the Butler building. It has concrete block walls with brick veneer that rise from a concrete slab foundation and a flat roof. It has two windows and two garage doors on the front, a row of high windows across the back and a single door. The east and west sides of the building each have a single door that enters into a portion of the main building, the east side also has a separate door that is the only entrance to a "battery storage room". Photographs No. 12 and No. 13 in Appendix B provide views of the OMS. One Conex was located on the east side of the OMS (Photograph No. 54 in Appendix B).

A military equipment parking (MEP) area and two privately owned vehicle (POV) parking areas are also contained within the Site. Photographs No. 9, No. 51 and No. 53 in Appendix B provide views of the MEP and POV areas. Approximately three-fourths of the 11.641-acre property is covered by impervious surface features (e.g. asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by lawn area and a sparse population of deciduous trees. Topographically, the Site is relatively flat with minimal relief.

Figure 2 in Appendix A provides a current plan view layout of the Site. Figures 3.1 and 3.2 depict the interior of the Butler building. Figure 4 depicts the interior layout of the OMS.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Figure 5 in Appendix A provides a portion of the 1994 Louisville, Kentucky U.S. Geological Survey (USGS) topographic map which includes the Site. As shown, the Site is situated at an elevation of approximately 524-feet above mean sea level and is relatively flat. Storm water sheet flows into drainage ditches located on or around the Site. The ditches drain into storm drains that empty into one of the Metropolitan Sewer District's system of catch basins that discharge to the Beargrass Creek watershed. A storm drain is also located in the grassy area north of the MEP area near the northern edge of the property boundary. The storm drain empties into the Metropolitan Sewer District's storm water system and is ultimately discharged to a catch basin/small stream.

No surface water features are located on or in the immediate vicinity of the Site. The Ohio River, located approximately four miles north-northwest of the Site, is the closest major surface water feature.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 3902530001C, the Site is not included in the 100-year floodplain elevation or the 500-year floodplain elevation. Figure 6 in Appendix A provides a map depicting the extent of the nearest designated 100-year and 500-year floodplains.

2.4.2 Hydrogeological Characteristics

According to information acquired from the Soil Conservation Service's State Soil Geographic Database for Jefferson County, the specific soil type at the Site is from the Crider series. The Crider series is not considered a hydric soil.

The surface soil is generally silty loam. This soil type has slow infiltration rates with layers impeding downward movement of water and is characterized as soil with fine textures. In a typical profile, the surface layer is approximately 12-in. thick and is a silty loam. The subsoil is approximately 38-in. thick and is also silty loam, with clayey soils.

2.5 SITE UTILITIES

Water Service – The Louisville Water Company provides potable water service to the Site. The OMS is connected to the Main Building (KY046) for water service. The Butler building (KY076) has a separate metered line for water service.

Sanitary Sewer System – The Metropolitan Sewer District provides sanitary sewer service to the Site. The primary source of wastewater that is directed to the city sewer system includes non-process wastewater such as bathrooms, sinks, etc.

Gas & Electric – Louisville Gas & Electric provides gas and electric service to the Site. The OMS and the Main Building (KY046) are connected on one metered line for electric service. The Butler building (KY076) has a separate metered line for electrical service. The OMS, the Main Building (KY046), and the Butler building (KY076) are joined on the same gas line. Federal codes require that each customer have their own utility service and cannot receive services through another customer.

2.6 WATER SUPPLY WELLS & SEPTIC SYSTEMS

Based upon a review of available historical site and agency records and interviews with site personnel, no water supply well nor a septic system has ever been located at the Site.

A search of Federal and State water well databases identified one water supply source located approximately 1/4 - 1/2 mile southeast and topographically up-gradient of the Site. Eighteen groundwater monitoring wells are located within one-mile of the Site.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Land titles for the Site originating from 1940 were reviewed. Appendix C contains a chain of title report completed for the Site. The chain of title report did not identify any leases or environmental liens against the USAR Center property. According to historical documentation, the United States of America filed an Amended Declaration of Taking and Amended Complaint of Condemnation for the Tract 100 on March 26, 1976, from the Louisville and Jefferson County Air Board (LJCAB). Prior to the U.S. Government's purchase of the land, the property was owned by the LJCAB for use by the Kentucky National Guard and the U.S. Army, as indicated on historical Sanborn fire insurance maps. Appendix E provides a copy of the historical Sanborn fire insurance maps obtained from Environmental Data Resources, Inc. (EDR).

Available business directories including City, cross-reference, and telephone directories were reviewed, if available, at approximately five-year intervals for the years spanning 1964 through 2004. According to a City Directory provided by EDR and dated February 5, 2007, the address of the USAR Center was first listed in the research source (Polk Directory) in 2006. Subsequent city directory searches do not list the exact address of the Site. A copy of the City Directory is included in Appendix E.

3.2 PAST USES AND OPERATIONS

The LJCAB purchased property in 1940, which included the Site. The property was used for the Kentucky National Guard based on historical information sources (Sanborn Fire Insurance Maps, topographical maps). In 1972, the U.S. Government leased the Site from the LJCAB for use as a reserve and mobilization center for the U.S. Army Reserve. In 1976, the U.S. Government purchased the land from the LJCAB through an Amended Declaration of Taking and Amended Complaint of Condemnation. Construction of the Butler building occurred in 1979. Review of historical topographical maps indicates that construction of the OMS building occurred in the early 1960's.

The Site has primarily functioned and is still utilized as an administrative, logistical, and educational facility. The OMS is currently used for storage. Historical operations in the OMS building included limited maintenance of military vehicles. The Site was historically used by reservists for drill activities on various weekends throughout the year. The 100th Division (DIV) Institutional Training (IT) is the current occupant at the Butler building, and uses the Site for administrative purposes. The mission of the 100th DIV IT is to provide quality military training and education in Combat Support, Combat Service Support and Initial Entry Training through formal classroom and hands-on training. At the time of the site visit, the Butler building was comprised of numerous offices, a military museum, a computer server room, an arms vault, distance learning

centers, classrooms, storage areas, kitchen, and break room (Photographs No. 14 through No. 41). A former indoor firing range (IFR) was located on the southern side of the building and was officially closed in 1993. The former IFR was cleaned in accordance with federally recognized standards. Upon completion of cleanup, lead levels were below clearance levels and the area was approved for reoccupancy. This area is currently used for storage.

The OMS building was formerly used to perform limited maintenance activities on military equipment. Activities inside the OMS building were limited to preventative maintenance checks, including checking vehicle fluids such as motor oil, water, and antifreeze, and light maintenance activities. Any equipment requiring heavier maintenance activities was sent to an Area Maintenance and Support Activity shop located at one of the other Reserve Centers in Kentucky. Equipment requiring major overhaul was also sent off site.

At the time of the August 2006 site visit, the OMS building contained a flammable materials cabinet with three five-gallon fuel containers (Photograph No. 42 and No. 43, Appendix B). Miscellaneous materials, such as small cans of paint and adhesive, were observed being stored in another room. Stored materials in the bay area included a box of spent fluorescent light bulbs, excess furniture, and unopened boxes of supplies, including two with flammable materials labels (Photographs No. 44 and No. 45 in Appendix B). A separate storage room located in the back of the OMS building contained a parts washer, a 55-gallon drum of paint, and a five-gallon pail of degreaser (Photographs No. 47 through No. 50 in Appendix B).

No military vehicles were observed in the MEP at the time of the Site visits.

Vehicle washing historically occurred near the OMS building on the vehicle wash rack. The OMS Plumbing, Heating, and Ventilating blueprints from 1975 depict the location of an oil-water interceptor. The wash rack and oil-water interceptor were removed in or after 1998. The concrete wash pad is still present (Photograph No. 52, Appendix B). A Conex containing field equipment such as tables, easels, and a tent is located by the wash pad (Photograph No. 54, Appendix B)

Historical aerial photographs, Sanborn Fire Insurance Maps, and topographic maps were the primary source of information on the past use and operations at the Site. Figures 7 through 12 in Appendix A provide USGS topographical maps of the Site. Aerial views of the surrounding areas and site from 1993 and 2002 are presented in Figures 13 and 14 of Appendix A. The Sanborn Fire Insurance Maps are located in Appendix E.

The 1960 USGS topographical map (Figure 7, Appendix A) shows the Main Building (KY046), residential areas, and the Bowman Field airport. The Veterans Housing Project is visible west of the Site, next to the airport. The Big Spring Country Club is east of the Site. The parachute training buildings and area is present at the location of the future Butler Building. The OMS had not been constructed at that time.

The 1965 USGS topographical map (Figure 8, Appendix A) shows the Main Building (KY046), residential areas, and the Bowman Field airport. The OMS building appears to have been constructed by this time. The Veterans Housing Project appears to have been removed. The parachute training buildings and area are still present at the location of the future Butler Building.

The 1971 USGS topographical map (Figure 9, Appendix A) shows the Main Building (KY046), the OMS building, residential areas, and the Bowman Field airport.

The 1982 USGS topographical map (Figure 10, Appendix A) shows the Main Building (KY046), the OMS building, residential areas, and the Bowman Field airport. Additional airplane hangars have been constructed west of the Site. Sidney Park Drive has been constructed north of the Site. The Butler building is present at this time.

The 1987 USGS topographical map (Figure 11, Appendix A) shows the Main Building (KY046), the OMS building, residential areas, and the Bowman Field airport. The Butler building is present. Additional airplane hangars have been constructed west of the Site.

The 1994 USGS topographical map (Figure 5, Appendix A) shows KY076 (the Butler Building and the OMS building), residential areas, and the Bowman Field airport.

The 1993 aerial photograph (Figure 12, Appendix A) shows the Main Building (KY046) and the KY076 facilities (the Butler building and the OMS). Surrounding the Site is the USAR Complex, with Bowman Field to the west and Big Springs Golf Course to the east.

The 2002 aerial photograph (Figure 13, Appendix A) shows the Site as it currently exists. The Big Springs Golf Course lies on the other side of Cannons Lane and is visible to the east of the Site. Directly to the northwest is the Jefferson County Air Pollution Control Board Vehicle Emissions Testing Facility. West of the Site is the rest of the USAR Complex. Southwest of the Site is the Kentucky State Police buildings. Directly south of the Site is a field and southeast of the Site is the Jewish Family & Vocational Service. Beyond the complex to the west of the Site are the hangars and Bowman Field. Single-family residences and the Jewish Community Center are visible further south of the Site.

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

3.3.1 Past Use and Storage 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 Army Reserve personnel.

Chemicals formerly used and stored at the Site were associated with vehicle maintenance activities, kitchen cleaning, facility maintenance, office supplies, and janitorial services. Janitorial chemicals were observed stored within the janitorial

closets. Office supplies were stored within the previous firing range area (Photographs No. 14 and No. 15, Appendix B). Various unused chemicals and products were stored in a small room by the kitchen. These chemicals included but are not limited to lighter fluid, toluene, WD-40, and other miscellaneous products (Photographs No. 28 through No. 30, Appendix B). Vehicle maintenance products and small amounts of petroleum, oil, and lubricant products were also stored within designated areas within the OMS building.

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 reportable quantities.

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 Army Reserve personnel. According to Army Reserve personnel and site records, there is no evidence that hazardous substances above reportable quantities were released or disposed at the Site. No stained soil or stressed vegetation was observed during the August 2006 site visit. Additionally, the MEP area and POV parking area did not show any signs of staining and no noxious or foul odors were noted during the August 2006 site visit. Snow prevented additional observations during the February 2, 2007 site visit.

3.4 PAST PRESENCE OF BULK PETROLEUM STORAGE TANKS

Based upon a review of available site records, a search of Federal and State environmental databases, and interviews with Army Reserve personnel, it does not appear that aboveground storage tanks (ASTs) or underground storage tanks (USTs) ever existed at the Butler Building or OMS. One UST for heating oil was located adjacent to the Main Building (KY046), which is not part of this ECP Report. It was reportedly removed in the early 1990's. A corrective action plan was submitted and implemented in 2003. Correspondence dated October 6, 2003, from the Commonwealth of Kentucky Division of Waste Management states that no further action (NFA) is required.

Based on review of historical records, an oil-water interceptor was present on Site, however there was no used oil storage tank associated with it. The oil-water interceptor discharged to the sanitary sewer system and was removed around 1998.

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 these reports. Copies of the reports, unless otherwise specified, are provided in Appendix D.

3.5.1 1991 Environmental Audit

The Fort Knox Directorate of Engineering and Housing's Environmental Management Division contracted Howard K. Bell Consulting Engineers, Inc. (1991 Environmental Audit) to perform an audit in 1991 for the Main Building (KY046) and KY076, which is the Butler Building, and the OMS. The purpose of the audit was to identify any obvious areas of environmental non-compliance and/or contamination. The audit focused on seven environmental areas. Five recommendations were proposed: closure of the UST at KY046, additional surveys of the facility to quantify the asbestos, submit a maintenance schedule/plan for the oil-water interceptor and verify that a discharge permit is not required for the interceptor, confirm the method and disposal of lead waste from the firing range, and evaluate the facility to verify that a hazardous waste permit is not required.

3.5.2 1993 Fort Knox Asbestos Inspection Report, Bowman #3

RMT, Inc. conducted an inspection to identify asbestos containing materials (ACM) for the USAR Buildings in Louisville, Kentucky. Potential types, quantities, locations, and conditions of asbestos were examined in the reports. Confirmed ACM was found to be present in the Butler building in the floor mastic and the roof HVAC units. The ACM in the Butler building was in good condition and non-friable. Asbestos containing fitting insulation was found throughout the OMS building. The insulation in the OMS was considered in good condition and was of low friability.

3.5.3 1993 Radon Testing Results

Correspondence dated June 30, 1993, presents results from radon testing for the 100th DIV and the 125th USAR. The results presented for Bowman Field were below 4.0 picoCuries per liter of air (pCi/L), which is the USEPA's recommended action level.

3.5.4 1998 Identification of Polychlorinated Biphenyls (PCBs) Containing Transformers

Green Consulting Services conducted an inspection of the transformers and light ballasts on the three USAR properties located at Bowman Field in Louisville, Kentucky. The facilities included the Site (KY076), and two other USAR Centers, the USAR Center at 3590 Century Division Way (KY046), and the USAR Center at 2901 Gast Boulevard (KY048). The report indicated that seven of the transformers located on or near the USAR Centers did not contain polychlorinated biphenyls (PCBs) and three transformers

did. The location of the three PCB containing transformers is unclear in the Green Consulting Services report. As stated in the aforementioned report, all of the light ballasts on the properties had been retrofitted since 1980.

3.5.5 1999 Asbestos and Lead Survey

The 81st Regional Support Command (RSC) Facility Area Support Team #1 contracted Science Applications International Corporation to perform asbestos and lead surveys for the identification, quantification, and assessment of asbestos and lead at the Butler Building. The analysis presented in the 1999 Asbestos and Lead Survey report indicates the presence of asbestos in the floor mastic in the Butler building. No exposed mastic was noted and the floor tiles were in good condition.

All lead levels were below the USEPA's classification for LBP.

3.5.6 2000 Lead Abatement Report

South Carolina Research Authority Environmental Enterprise Group, Inc. (EEG) was retained to perform a lead dust survey and abatement for the former indoor firing range at the Butler building. An encapsulation material was applied to the floors and accessible surfaces to reduce the levels of lead in the dust contamination to the USEPA and U.S. Department of Housing and Urban Development acceptable levels. Remaining recommendations included utilizing lead controls anytime the ventilations system is worked on or disturbed or any time the backstop deflector plates require work.

3.5.7 2002 Asbestos Inspection Report

EEG, Inc. conducted an inspection to identify asbestos containing building materials (ACBM) for the U.S. Army Reserve Center – Louisville 3, which is Site. Potential types, quantities, locations, and conditions of asbestos were examined in the report. Confirmed non-friable ACBM was found to be present in the Butler building in the floor mastic. No ACBM was identified in the OMS.

3.5.8 2004 Lead-Based Paint Survey Reports

The 81st RSC retained EEG to identify the locations of LBP at the USAR Center in Louisville. The components that contained consistently detectable amounts of lead in the OMS were the exterior and interior doors, casings and lintels as well as structural steel components. The interior door casings in the Butler building contained minimal amounts of lead.

3.5.9 2004 Intensive Architectural Survey of Selected Facilities, 81st Regional Support Command Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee

This document was prepared for the 81st RSC by the Brockington and Associates, Inc. The purpose of this document was to inventory eighteen properties controlled or leased by the 81st RSC in the states of Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. Historical information, setting and landscape, cultural resources, security, architectural information, and structure descriptions are included for each property. Each facility was also assessed for its eligibility in the National Register of Historic Places (NRHP). The pertinent information regarding the subject Site has been extracted from the report and is included in Appendix D. Neither the Butler building nor the OMS met the criteria for inclusion in the NRHP.

3.5.10 2007 Radon Testing Results

Correspondence dated January 12, 2007, presents results from radon testing for the 100th DIV Butler Building. The results presented were above 4.0 pCi/L, which is the USEPA's recommended action level. However, according to the Area 1 Environmental Manager for the 81st Regional Readiness Command (RRC), a number of the radon sample kits were defective and this facility was retested by the U.S. Army in February and March 2007 to confirm results.

The February 2007 radon test results indicate the presence of radon at 13.5 pCi/L. Additional radon tests were performed in March 2007 at two locations within the Butler Building for a period of 20 days. One location, identified as CMD, had a result of 4.1 pCi/L and the other location, identified as storage, had a result of 18.3 pCi/L.

4.0 ADJACENT PROPERTIES

Figure 13 in Appendix A provides a 2002 aerial view of the Site and adjacent properties. Table 1 provides a list of adjacent properties with their directional location in regards to the Site. The zoning of the adjacent parcels is also listed in Table 1. Photographs No. 1 through No. 6 in Appendix B provide views of adjacent properties and surrounding land use.

TABLE 1 LIST OF ADJACENT PROPERTIES			
Direction From Site	Name/Type of Property	Address	Zoning
North	Louisville Jefferson County Air Board (former VET building)	2730 Cannons Lane Louisville, KY 40205	R-4, Single Family Residential
South-South East	Jewish Family & Vocational Service	3587 Dutchmans Lane Louisville, KY 40205	OTF-Office/Residential
East	Big Spring Country Club Golf Course	5901 Dutchmans Lane Louisville, KY 40205	R-4, Single Family Residential
East	USAR Center KY046, Building P-1	3590 Century Division Way Louisville, KY 40205	R-4, Single Family Residential
West	Col. Earl E. Major Building USAR Center (KY048)	2901 Gast Blvd. Louisville, KY 40205	R-1, Single Family Residential
Southwest	Kentucky State Police	3454 Roger E. Schupp St. Louisville, KY 40205	R-1, Single Family Residential
Southwest	Louisville Jefferson County Metro Drivers Licensing Application And Renewals	3501 Roger E Schupp St. Louisville, KY 40205	R-1, Single Family Residential

Appendix A, Appendix D, and Appendix E provide historical aerial photographs, topographic maps, environmental reports, and environmental database results, which were used to evaluate any potential environmental impacts on adjacent properties that may have also impacted the environmental condition at the Site. Land use at all 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 which is likely to cause or contribute to a release or threatened release of any hazardous substance or any petroleum product on the Federal real property. A regulatory database summary was acquired from EDR on February 1, 2007. The regulatory 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.

5.1 FEDERAL ENVIRONMENTAL RECORDS

5.1.1 Federal NPL Sites within 1.0-Mile

The National Priorities List (NPL) record is a USEPA registry of the nation's worst uncontrolled or abandoned hazardous waste sites. NPL sites are targeted for long-term remedial action under CERCLA. According to the EDR report, the USAR Center is not a NPL site and there are no such sites located within one-mile of the Site.

5.1.2 Federal CERCLIS Sites within ½-Mile

The CERCLA Information System (CERCLIS) contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private 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 EDR report, the USAR Center is not a CERCLIS site and there are no CERCLIS sites located within a ½-mile of the Site.

5.1.3 RCRA Corrective Action (CORRACTS) Sites within 1.0-Mile

Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACTS) sites represent facilities that have generated or managed hazardous wastes and require corrective action. According to the EDR report, the USAR Center is not a CORRACTS site. No CORRACTS sites were identified within one-mile of the Site.

5.1.4 RCRA Transport, Treatment, Storage, and/or Disposal Sites within ½-Mile

The RCRA Information System (RCRIS) includes selective information on sites that generate, transport, treat, store, and/or dispose (TSD) of hazardous waste as defined

by RCRA. According to the EDR report, the USAR Center is not a RCRIS-TSD site and there are no such sites located within ½-mile of the USAR Center.

5.1.5 Federal RCRA Small and Large Quantity Generators List within ¼-Mile

Conditionally exempt small quantity generators are defined as facilities generating less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. RCRA small quantity generators are defined as facilities generating between 100 kg and 1,000 kg of hazardous waste per month, while a large quantity generator is defined as a facility generating more than 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Two RCRA-registered small quantity generators are located near the Site according to the information provided by EDR. The USAR Center 125th DIV (KY048), known as the Col. Earl E. Major Building USAR Center, is located within ¼-mile of the Site, approximately 960-feet north of the subject USAR Center. Twinbrook Nursing Home is located approximately ¼-mile (1126 ft.) south-southwest of the Site. No RCRA violations are associated with the Twinbrook Nursing Home. However, in 1993, the USAR Center 125th DIV (KY048) Col. Earl E. Major Building received a violation with monetary penalties. No large quantity generators are situated within ¼-mile of the Site.

5.1.6 Federal Emergency Response Notification System (ERNS) List

The ERNS List provides information on reported releases of oil and hazardous substances. According to the EDR report, the USAR Center is not on this notification list.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented below was obtained from the EDR regulatory database search report. Supplemental information was also provided from database searches via the Commonwealth of Kentucky's online utility.

5.2.1 State-Registered Landfills or Solid Waste Disposal Sites within ½-Mile

According to the EDR report, no solid waste landfills, incinerators, or transfer stations are located within ½-mile of the USAR Center. The Site does not have a solid waste landfill, incinerator, or transfer station within the property boundary.

5.2.2 State-Registered Leaking UST Sites within ½-Mile

According to the EDR report and Kentucky UST Branch, there are no leaking USTs within ½ mile of the Site.

5.2.3 State-Registered UST Sites within ¼-Mile

According to the EDR report and Kentucky UST Branch, two UST sites were identified within ¼ - mile of the USAR Center. Table 2 lists the sites along with their address and elevation relative to the Site. The Site itself is not listed in the State UST database.

Both USTs have been removed and the Sites were granted NFA under Kentucky's Corrective Action guidance document. Neither property is considered to present an environmental risk to the USAR Center.

TABLE 3 Underground Storage Tank Sites					
Company/Site	Address	Distance and Direction from Site	Tank Status	Closure Status	Elevation Relation to Site
Shalom Towers	3650 Dutchmans Lane, Louisville, KY 40205	Approximately 1305-feet east south-east	Removed	NFA	Lower
Twinbrook Nursing Home	3526 Dutchmans Lane, Louisville, KY 40205	Approximately 1038-feet south	Removed	NFA	Lower

5.2.4 State Spills Incidents (KY Spills)

According to the Kentucky Emergency Response Team, the USAR Center has not had any reportable spills or releases.

5.2.5 Records of Contaminated Public Wells

According to the EDR report, no state registered contaminated public wells are located within one-mile of the USAR Center.

5.2.6 Voluntary Action Program Sites within ½-Mile

According to the EDR report, no state registered voluntary action program sites are located within ½-mile of the USAR Center.

5.2.7 State Brownfields Program Sites within ½-Mile

According to the EDR report, no state registered Brownfield Program Sites are located within ½-mile of the USAR Center.

5.2.8 State-Registered Sites with Engineering Controls within ½-Mile

According to the EDR report, no state registered sites requiring engineering land use controls are located within ½-mile of the USAR Center.

5.2.9 State-Registered Sites with Institutional Engineering Controls within ½ - Mile

According to the EDR report, no state registered sites requiring institutional engineering land use controls are located within ½-mile of the USAR Center.

5.2.10 State-Registered Drycleaning Facilities within ¼-Mile

According to the EDR report, no dry cleaning facilities are located within ¼-mile of the USAR Center.

5.3 TRIBAL ENVIRONMENTAL RECORDS

The regulatory information presented below was obtained from the EDR regulatory database search report.

5.3.1 Registered Indian Reservations within 1 - Mile

According to the EDR report, no designated Indian Reservations are located within one-mile of the USAR Center.

5.4 UNMAPPED SITES

The EDR database search yielded fifteen unmapped sites. Unmapped sites are those with insufficient address information such that they can only be identified as within the zip code of the target property. Every effort was made to locate these sites and assess their relevance to this ECP report. Further research was conducted using the mapping utility provided at <http://www.maps.google.com>, <http://www.mapquest.com>, and <http://www.whitepages.com>. The locations of all orphaned sites were identified and mapped in relation to the Site. None of the unmapped locations were within the specified search radius from the Site that would affect the environmental conditions at the Site.

5.5 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO THE SITE

To summarize Subsections 5.1 through 5.3, three separate properties, in addition to the USAR Center, were evaluated as potential risk properties to the Site. The properties evaluated were identified as a result of information obtained during area reconnaissance and regulatory database searches and are listed below in Table 4.

TABLE 4 PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
USAR Center 125 th DIV KY048 (Col. Earl E. Major Building)	RCRA Small Quantity Generator	Lower	No	RCRA violations in 1993.
Shalom Towers	UST	Lower	No	UST received NFA.
Twinbrook Nursing Home	RCRA Small Quantity Generator, UST	Lower	No	UST received NFA. No RCRA violations.

Based on an evaluation of available site information and details concerning the properties listed in Table 4, none of the facilities evaluated are classified as "High Risk". "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

Findings documented in the following subsections are based on the August 10, 2006, and February 2, 2007, site visits and area reconnaissance, a review of available site records, and information obtained from USAR personnel.

6.1 UNDERGROUND/ABOVEGROUND STORAGE TANKS (USTs/ASTs)

It does not appear that USTs or ASTs were located or are currently present on Site. Based upon review of records, an exempt UST for heating oil was removed in the early 1990's and remediated in 2003 at the KY046 Main Building, north of the Butler building.

In addition, EEG, Inc. noted an oil/water separator in the 1991 Environmental Audit Report. Facility blueprints depict the location of an oil-water interceptor associated with the wash rack by the OMS. In 1998, the wash rack and oil-water interceptor were closed by Astrid Contract Technical Services, Inc. No UST was associated with the interceptor.

6.2 INVENTORY OF CHEMICALS / HAZARDOUS SUBSTANCES

At the time of the August 2006 site visit, the OMS building contained a flammable materials cabinet with three five-gallon fuel containers. Additional items stored within the OMS building were paint, adhesives, spent light bulbs, and unopened boxes of supplies, including two with flammable materials labels. A separate storage room located in the back of the OMS building contained an old parts washer, a 5-gallon pail of Top Gun multi-purpose alkaline cleaner, and a 55-gallon poly drum marked DeHart Paint (Photographs No. 47 through No. 50, Appendix B). The parts washer was empty. No stains were noted on the floor.

There were two janitorial closets with associated supplies in the Butler building. Janitorial services are contracted to an outside firm. There was a flammables storage cabinet in the old firing range that held a spray bottle of window cleaner (Photographs No. 16 and No. 17, Appendix B). Other items stored in this area included miscellaneous office supplies and field equipment. The storage area next to the kitchen held numerous chemicals such as toluene, dishwasher cleaners, WD-40, lighter fluid, and paint (Photographs No. 28 through No. 30, Appendix B). Site personnel stated the flammable materials would be relocated to the flammables storage cabinet until transfer to the Defense Reutilization and Marketing Operations.

There is no evidence that hazardous substances above reportable quantities were stored, released or disposed at the Site.

6.3 WASTE DISPOSAL SITES

There were no signs of landfilling or illegal waste disposal activities at the Site during the August 2006 or February 2007 site visits.

6.4 PITS, SUMPS, DRYWELLS, AND CATCH BASINS

There are no sumps in the Butler building or OMS building. There are several floor drains in the bathrooms and janitorial closets that connect to the sanitary sewer system.

The vehicle washing area located to the east of the OMS building had two slotted drains that once connected to an oil-water interceptor located in the MEP area, based on the 1991 Environmental Report. No drains were observed in this area during the site visit. The area is no longer in use and the oil-water interceptor has been removed per correspondence from Astrid Contract Technical Services, Inc. Ultimate discharge would have been to the municipal sanitary sewer.

Storm water flows into drainage ditches located around the site. The ditches drain into storm drains that empty into one of the Metropolitan Sewer District's system of catch basins that discharge to the Bear Creek watershed. A storm drain is also located in the grassy area north of the MEP near the northern property boundary. The storm drains flows empties into the metro storm water system as well and is ultimately discharged to a catch basin/small stream.

6.5 ASBESTOS-CONTAINING MATERIAL (ACM)

Three asbestos surveys were performed on the Site. An asbestos survey, conducted as part of the *Asbestos Inspection Report* prepared by EEG, Inc. in March 2002, confirmed ACM located in the floor mastic of the Butler building. The 1999 *Asbestos and Lead Surveys* by Science Applications International Corporation also documented the presence of asbestos in the floor mastic in the Butler building. Appendix D provides a copy of the surveys. During the February 2007 site visit it was noted that a few of the floor tiles were broken and the mastic had been exposed (Photographs No. 21 and No. 22, Appendix B). The mastic is non-friable unless disturbed.

The 1993 *Fort Knox Asbestos Survey Report* by RMI, Inc. confirmed that ACM was in the fitting insulation in the OMS and was of low friability. According to the USAR Facility Management Specialist, the U.S. Army performed asbestos abatements in 1993. However, no documentation regarding abatement has been provided.

The Site has an Asbestos Operations and Maintenance (O&M) plan for the mastic in the Butler building. The O&M plan states that the mastic is non-friable and it also states that no ACBM is present in the OMS building.

6.6 POLYCHLORINATED BIPHENYL CONTAINING EQUIPMENT

A total of four pole-mounted transformers are located on the Site (Photograph No. 10 and No. 11, Appendix B). A cluster of three transformers are on the west side of the Butler building and one transformer is on the northwest corner of the Butler building. The *Identification of Polychlorinated Biphenyls (PCB) Containing Transformers Report* prepared by Green Consulting Services and dated August 2, 1998, is unclear regarding the PCB content of these transformers. Louisville Gas & Electric was contacted in February 2007 and they stated these specific transformers do not contain PCBs. During the August 2006 and February 2007 site visits, the units appeared to be in good condition and no evidence of leakage was observed.

The same report also states that all of the ballasts at the facility have been retrofitted since 1980. The light ballasts currently present at the Site appear to be in good condition and no leaking dielectric fluid was observed during the site visit. As such, they are in compliance with Federal and State regulations and have not negatively impacted environmental conditions at the Site.

6.7 LEAD

EEG, Inc. completed a LBP survey in 2004 for the Site. The survey confirmed LBP was present in the OMS building in the interior and exterior door casings and lintels, and structural steel components. The interior door casings in the Butler building contained minimal amounts of lead. In general, the paint was in good condition, and no peeling paint was observed during the August 2006 or February 2007 visits.

6.8 RADON

The 1993 radon testing results indicated that the Bowman field site was below 4.0 pCi/L, which is the USEPA's recommended action level. It is unknown which USAR Center facility Bowman field corresponds to. The January 2007 results indicate a 7.5 pCi/L, which is above the USEPA's recommended action level. According to the 81st Regional Readiness Center Area 1 Environmental Manager, a number of the radon sample kits were defective and this facility was retested by the U.S. Army in February and March of 2007 to confirm initial results. The subsequent radon tests confirmed the presence of radon at 13.5, 4.1, and 18.3 pCi/L, which is above the USEPA's recommended action level.

6.9 MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

An arms vault is located in the Butler building with small arms weapons. Site personnel stated that live ammunition is present on Site for security purposes. There is no target practice conducted at this location. No indications were found during the August 2006 or February 2007 site visits or during the review of records to indicate the current or past presence of MEC at the Site, which includes unexploded ordnance.

6.10 RADIOACTIVE MATERIALS

During the August 2006 and February 2007 site visit and records review process, no indications were found of the past storage or release of radiological commodities at the USAR Center.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

Figure 13 in Appendix A provides a 2002 aerial photograph of the USAR Center and surrounding properties and depicts current land use. According to the City of Louisville's Zoning Administrator, the Site is zoned R-1, Single Family Residential. The Site is located in a mixed-use area that combines commercial, office, multi-family residential and single family residential land uses.

7.2 COASTAL ZONE MANAGEMENT

The Commonwealth of Kentucky does not have a Coastal Zone Management program.

7.3 WETLANDS

According to the U.S. Fish and Wildlife Service National Wetlands Inventory map, no jurisdictional wetland areas are identified on the Site or adjacent properties. Figure 14 in Appendix A provides a map of wetlands in the immediate vicinity of the Site. Soils in the vicinity of the Site are from the Crider Series. The Crider Series is not considered a hydric soil.

7.4 100-YEAR FLOOD PLAIN

A review of the FEMA digital Flood Hazard Area map indicates that the Site lies outside the 100-year and 500-year floodplains. Figure 6 in Appendix A provides a map of the flood plain elevations located in the immediate vicinity of the Site.

7.5 NATURAL RESOURCES

Based on the developed nature of the Site, small size, and lack of sensitive natural resources, no specific natural resources management activities are recommended for this Site.

7.6 CULTURAL RESOURCES

An Intensive Architectural Survey of Selected Facilities was prepared for the 81st RSC by Brockington and Associates, Inc. The purpose of the survey and subsequent report was to inventory eighteen properties controlled or leased by the 81st RSC in the states of Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina,

and Tennessee. Historical information, setting and landscape, cultural resources, security, architectural information, and structure descriptions are included for each property. Each site was also assessed for its eligibility to the NRHP. Overall, neither of the buildings at the Site was found to meet the criteria for inclusion in the NRHP. Appendix D provides a copy of the survey report.

7.7 OTHER SPECIAL RESOURCES

As reported in the National Wild and Scenic River (WSR) System, there is one designated WSR within the Commonwealth of Kentucky, the Red River. Portions of nine rivers of exceptional quality and aesthetic character have been designated by the Kentucky General Assembly as Kentucky Wild Rivers: Bad Branch, Cumberland River, Green River, Red River, Little South Fork Cumberland River, Big South Fork Cumberland River, Rockcastle River, Rock Creek, and Martin's Fork. The Red River is approximately 80 miles to the south. Based on the location of the WSRs and historical activities conducted at the USAR Center, no activities conducted at the Site would adversely impact the designated WSRs.

8.0 CONCLUSIONS

GEO Consultants, LLC, under contract to the Louisville District, has prepared this ECP report for the MG Benjamin J. Butler USAR Center (Facility ID KY076), located at 3600 Century Division Way, Louisville, Jefferson County, Kentucky, 40205 on an 11.641-acre tract. The USAR Center is currently occupied by the 100th DIV IT. KY076 is part of a complex that includes the Butler Building, a second building (KY046), and an OMS. This report covers the Butler Building and the OMS. The Butler building has primarily functioned as an administrative, logistic, and educational facility, with limited vehicle maintenance historically occurring in the OMS building.

Findings of this ECP are based on existing environmental information, including visual observations, site records, 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 paragraphs present the findings related to areas of potential environmental concern that were evaluated during the ECP process.

- **Use & Storage of CERCLA Hazardous Substances** - Chemicals containing CERCLA hazardous substances would have been used and stored at the Site in amounts necessary to support unit-level vehicle and building maintenance activities. There is no evidence that hazardous substances above reportable quantities were stored, released or disposed at the Site. Any materials currently stored on Site will be redistributed or properly disposed prior to vacating the Site.
- **Petroleum Product Storage** - No petroleum ASTs or USTs are currently present on Site. There is no evidence that ASTs or USTs have historically been present on the Site
- **Wash Water Discharge** - A vehicle wash facility, consisting of a wash pad, wash rack and oil-water interceptor was located by the OMS building. The wash rack and oil-water separator have been removed and all that remains is the concrete wash pad, that is not longer in use. All waters associated with the wash facility discharged to the municipal sanitary sewer system.
- **PCB Transformers** - Four pole mounted transformer units are located on Site and do not contain PCBs. During the August 2006 and February 2007 site visits, the exterior of the units appeared to be in good condition and no evidence of leakage was observed.
- **PCB Equipment** - According to a report by Green Consulting Services (dated August 2, 1998), all the ballasts on the property have been retrofitted since 1980.
- **Asbestos** - The 1999 and 2002 asbestos surveys identified non-friable ACM present in the Butler building in the floor mastic. At the time of the site visit, a few of the floor tiles were broken and the mastic was visible. No ACM was identified in the OMS by these reports. However, the 1993 asbestos survey reported ACM in the

fitting insulation throughout the OMS. No documentation is present regarding abatement of this material.

- **Lead-Based Paint (LBP)** - A LBP survey was completed in 2004 for the Site. The survey identified minimal amounts of lead in the interior door casings in the Butler building and significant detectable amounts of lead in the interior and exterior door casing and lintels and structural steel components in the OMS. Painted surfaces were in good condition and no peeling paint was observed during the site visits.
- **Radon** - The radon testing results from 2007 indicate radon levels at 7.5 pCi/L, 13.5 pCi/L, 4.1 pCi/L, and 18.3 pCi/L, which are above the USEPA's recommended action level of 4.0 pCi/L.
- **MEC** - No indications were found during the August 2006 and February 2007 site visits or records review process of the past presence of MEC, including unexploded ordnance, at the Site. The Site had previously had a firing range in southern portion of the Butler building; it was closed sometime prior to 2000 and converted to a storage area.
- **Radiological Materials** – No radiological materials were stored on Site at the time of the August 2006 and February 2007 site visits. There is no evidence to suggest that any radiological commodities were ever improperly managed at the Site, or that any radionuclides were ever released.
- **Nearby Properties** - Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site, were evaluated. None of the properties evaluated are considered high risk. "High Risk" properties are those that exhibit environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

In accordance with DoD policy as previously summarized in Section 1.1 of this ECP, the Site has been classified as Category 1, an area or parcel of real property where no release, or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).

9.0 REFERENCES

Persons Contacted

- Mr. Dave Thomas, Facility Management Specialist, U.S. Army Reserve (502) 777-7099
- Ms. Kristie Welch, Area 1 Environmental Manager, JM Waller Associates, Contractor for 81st Regional Readiness Command, (615) 231-4268
- Staff Sergeant Daniel R. Weeks, U.S. Army Recruiter, (502) 583-2771
- Mr. Lenny Gunnell, U.S. Army Corps of Engineers Louisville District (502) 315-6317

Resources Consulted

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- Metropolitan Sewer District
- Louisville Gas & Electric
- Louisville Water Company
- Metro Louisville Planning and Design
- Kentucky Division of Waste Management, UST Branch
- Kentucky Division of Waste Management, Louisville District Office
- Kentucky Department for Environmental Protection Emergency Response Team