FINAL

ENVIRONMENTAL CONDITION OF PROPERTY REPORT

WILLIAM HERZOG MEMORIAL
U.S. ARMY RESERVE CENTER (TX025)
4900 SOUTH LANCASTER ROAD
DALLAS, TEXAS 75216

Prepared For:

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

February 12, 2007

CERTIFICATION

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

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

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

February 12, 2007

LENARD GUNNELL, P.G. **DATE**
Project Geologist
U.S. Army Corps of Engineers

EXECUTIVE SUMMARY

The 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 William Herzog Memorial U.S. Army Reserve (USAR) Center (Facility ID TX025), hereafter referred to as the "Site" or "USAR Center." The Site is located at 4900 South Lancaster Road in Dallas, Dallas County, Texas.

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 approximately 5 acres of land with two permanent structures: the 42,767-square-foot Administration Building and the 6,363-square-foot organizational maintenance shop (OMS). The site is currently occupied by the 490th Civil Affairs Battalion and the Federal Bureau of Prisons.

Based on a review of aerial photographs and U.S. Geological Survey topographical maps dating back to 1893, the Site was an undeveloped lot prior to 1957. The Site buildings were constructed in 1957, with the addition of the north wing of the Administration Building sometime between 1958 and 1973 and the addition of the southeast wing in 1985. The Site tenants from 1957 to 1969, at which time the property was deeded to the United States of America, are not known.

An approximately 10-cubic-yard dirt pile of unknown origin and contents near the northwest corner of the military equipment parking lot had no odor and was covered with vegetation. Petroleum stains and sorbent material were observed on the concrete floor of the OMS during the Site reconnaissance, specifically where a forklift was leaking fluids.

Areas of potential environmental concern were reviewed and the TEJV found no significant concerns relating to 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
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
CR	Commercial Retail
DoD	Department of Defense
EBS	Environmental Baseline Survey
ECCI	Engineering, Compliance and Construction, Inc.
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
ERNS	Emergency Response Notification System
FEMA	Federal Emergency Management Agency
hazmat	hazardous material
IFR	indoor firing range
IHW	Industrial and Hazardous Waste
IOP	Innocent Owner/Operator Program
kg	kilogram
LBP	lead-based paint
LPST	leaking petroleum storage tank
LQG	large-quantity generator
MEP	military equipment parking
MF-2(A)	multi-family residential
mg/L	milligram per liter
µg/ft^2	micrograms per square foot

NFRAP	No Further Remedial Action Planned
NOV	Notice of Violation
NPL	National Priorities List
OMS	organizational maintenance shop
OWS	oil-water separator
Parsons	Parsons Engineering Science, Inc.
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
PMT	pole-mounted transformer
POL	petroleum, oil, and lubricants
POV	privately owned vehicle
PST	petroleum storage tank
RCRA	Resource Conservation and Recovery Act
RQ	reportable quantity
RRC	Regional Readiness Command
SQG	small-quantity generator
TBA	Targeted Brownfields Assessments
TCEQ	Texas Commission on Environmental Quality
TEJV	Terraine-EnSafe Joint Venture
TSD	treatment, storage, and disposal
TWDB	Texas Water Development Board
USACE	U.S. Army Corps of Engineers
USAR	U.S. Army Reserve
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
VA	Veterans Administration
VCP	Voluntary Cleanup Program
VWR	vehicle wash rack

1.0 INTRODUCTION

The 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 William Herzog Memorial U.S. Army Reserve (USAR) Center (Facility ID TX025), 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 4900 South Lancaster Road in Dallas, Dallas County, Texas, 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 (ASTM) 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 approximately 5-acre USAR Center at 4900 South Lancaster Road in Dallas, Texas. The property is bounded by a residential apartment complex and commercial property to the north, South Lancaster Road to the west, vacant residential property to the south, and residential property to the east. A general Site location map, Site map, historical aerial photographs and topographic maps, a U.S. Fish and Wildlife Service (USFWS) wetlands map, and a Federal Emergency Management Agency (FEMA) floodplain map are provided in Appendix A. Appendix B provides photographs taken during the August 2006 Site reconnaissance. Appendix C provides the chain-of-title information for the Site. 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 subject property. 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 property 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 similar 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 documents, a thorough review of the applicable and relevant documents, a visual 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 Site reconnaissance involved a driving tour of the Site and its perimeter, as well as a systematic survey by vehicle and on foot through each section of the property. The visual 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. The Administration Building and organizational maintenance shop (OMS) were inspected.

A visual reconnaissance of the Site perimeter was conducted to evaluate adjacent property uses that could cause environmental contamination detected on the Site. TEJV personnel drove on roads along the perimeter and in the surrounding area 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 is at 4900 South Lancaster Road in Dallas, Dallas County, Texas. As shown on Appendix A, Figure 1, the Site is located in the southeast portion of Dallas County within the city limits of Dallas. The Site is in a mixed residential and commercial area with Glendale Park to the southwest. Five Mile Creek and its surrounding park area are located approximately 2,500 feet south of the Site.

2.2 ASSET INFORMATION

Facility Name and Address:	William Herzog Memorial USAR Center (TX025) 4900 South Lancaster Road Dallas, Texas 75216
Property Owner:	United States Government
Dates of Ownership:	May 21, 1969
Current Occupant:	490th Civil Affairs Battalion and Federal Bureau of Prisons
Zoning:	Multi-Family Residential (MF-2(A))
County, State:	Dallas County, Texas
USGS Quadrangle:	Oak Cliff, Texas 7.5-Minute Quadrangle
Latitude/Longitude:	32° 41' 20.8" N; 96° 47' 23.3" W

Legal Description:	Being that parcel or tract of land, known as Lot 5, Block 4893, situated and lying in the City of Dallas, Dallas County, State of Texas.
Assessor's Parcel No:	00000345172000000

2.3 PHYSICAL DESCRIPTION

A Site layout plan of the USAR Center is provided in Figure 2 in Appendix A. Site reconnaissance photographs are presented in Appendix B. Photographs 1 through 18 show exterior views of the facility grounds and adjoining properties. Photographs 19 through 28 show interior views of various parts of the Administration Building and OMS.

The USAR Center is situated on approximately 5 acres of land with a general slope to the south. The Site has two permanent structures constructed in 1957: the 42,767-square-foot Administration Building and the 6,363-square-foot OMS. Additional structures at the Site include a vehicle wash rack (VWR) pad, which was installed in 1963, and an associated oil-water separator (OWS) reportedly installed in 1979.

Privately-owned vehicle (POV) parking areas border the Administration Building on its north, east, and south sides. A fenced military equipment parking (MEP) area is north of the OMS. The POV parking areas are asphalt-paved, whereas the MEP area is concrete paved. The Site is fenced on all sides except along South Lancaster Road. Approximately three-quarters of the approximately 5-acre tract is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.), while the remainder is covered by lawn or bare turf with a few trees surrounding the Administration Building. Vehicle access is from South Lancaster Road via entrances on the north and south sides of the Administration Building.

The Administration Building is a two-story building containing offices and an Assembly Hall. The building has a concrete foundation and concrete block exterior walls with brick veneer. Interior walls are covered with sheetrock. The first- and second-floor plans are provided in Figures 3 and 4 in Appendix A. The first floor contains offices, storage rooms, a mechanical room, a kitchen and scullery, a library, restrooms, a janitor's closet, and the Assembly Hall. The second floor contains classrooms, offices, a mechanical room, and restrooms. As shown in Photograph 19 in Appendix B, stains were observed beneath an air compressor in a mechanical room. Floor drains were observed in the mechanical rooms, kitchen, and restrooms. The kitchen drain presumably connects to a grease trap, which is shown in Photograph 16 in Appendix B.

The OMS is a one-story building with a concrete foundation and concrete block and brick exterior walls. Two single pedestrian doors are located on the west side of the building. Five overhead doors are on the north side of the building. Inside, the building has five vehicle bays and storage for materials used for vehicle maintenance. An empty

flammable materials storage cabinet was noted inside the OMS during the Site reconnaissance.

A VWR is located approximately 100 feet north of the OMS in the MEP lot. The VWR has a concrete foundation surrounded by a 6-inch containment curb. A steel grate in the center of the wash rack collects spent vehicle wash water and directs it toward a 1,436-gallon OWS. The OWS is on the west side of the VWR and drains to the sanitary sewer. The OWS was installed in 1979 and is registered as a petroleum storage tank (PST) with the Texas Commission on Environmental Quality (TCEQ) under Facility ID No. 0069232. The VWR is covered by a metal canopy supported by six steel poles. Photographs 13 and 14 in Appendix B provide views of the VWR and OWS. There was no visual evidence of surface spillage, stains, or releases at the VWR or OWS.

Electric power to the Site is provided by overhead lines from TXU Energy. Three pole-mounted transformers (PMTs), which provide power to the USAR, are on a single pole on the west side of the Administration Building, adjacent to South Lancaster Road (Photograph 31 in Appendix B). Two PMTs on a single pole on the northwest property boundary along South Lancaster Road (Photograph 30 in Appendix B) provide power to the self-service car wash on the adjacent property to the north.

Military vehicles were parked on the Site within the MEP lot and inside the OMS during the Site reconnaissance.

The USAR Center is currently occupied by the 490th Civil Affairs Battalion and the Federal Bureau of Prisons. On order, the 490th Civil Affairs Battalion mobilizes and deploys to the U.S. Pacific Command Area of Responsibility to conduct Civil Affairs and Civil Military Operations in support of the 1st Cavalry Division. The 490th Civil Affairs Battalion exercises administrative control of Civil Affairs forces to ensure proper employment and to minimize civilian interference with military operations, promote mission legitimacy, and ensure that the commander's moral and legal obligations to the civilian populace are met. The 490th unit has 10 full-time personnel and an authorized strength of 147 personnel. The Federal Bureau of Prisons uses the southeast wing of the Administration Building for administrative functions. The Federal Bureau of Prisons has approximately 120 full-time employees at the Site.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Figure 1 in Appendix A provides a portion of the 1981 Oak Cliff, Texas U.S. Geological Survey (USGS) topographic map which includes the Site. As shown, the Site is situated on the edge of a topographic high, approximately one-half to three quarters of a mile northeast of Five Mile Creek. The Site is at an elevation of approximately 490 feet above mean sea level with a gentle slope to the southwest toward Five Mile Creek, which is approximately 2,500 feet south of the Site. No surface water features are present on the Site.

Storm water flows primarily to the west-southwest across the MEP and POV parking lots toward South Lancaster Road. Once storm water reaches South Lancaster Road, it flows south and enters city of Dallas storm drains along the street.

2.4.2 Hydrogeological Characteristics

Dallas County, in the Blackland Prairie physiographic province of the West Gulf Coastal Plain, is characterized by relatively level to slightly rolling land surface consisting of low floodplains, broad flat upland terraces, and rolling hills in the Trinity River watershed. This terrain is dissected by numerous dendritic streams and creeks, and surface drainage is occasionally controlled by fractures or faults in the locally outcropping Austin Chalk (Dutton et al., 1994).

The geologic sequence in Dallas County consists of the following Cretaceous and Quaternary-age units in ascending order:

- Cretaceous-age Sedimentary Rocks: Twin Mountains/Travis Peak, Glen Rose, Paluxy, Woodbine, Eagle Ford Shale, Austin Chalk, and Ozan Formations

- Quaternary-Age Unconsolidated Sediments: Holocene alluvium, Pleistocene terrace deposits, and fluvial stream deposits

These deposits and rock units make up the following three primary hydrogeologic units in Dallas County:

- Local shallow groundwater zones in unconsolidated Pleistocene and Holocene sediments

- The Cretaceous-age regional confining sedimentary bedrock system (Eagle Ford Shale, Austin Chalk)

- The regionally confined Cretaceous-aged aquifer system

Based on a review of the Geologic Atlas of Texas, Dallas Sheet (Bureau of Economic Geology, 1988), the subject property lies on the Cretaceous, Austin Chalk Formation (Austin Chalk). The Austin Chalk is a mostly micro-granular, massive limestone with thinly inter-bedded calcareous clay zones and ranges from 300 to 500 feet thick. The limestone is gray, but weathers to a buff white color and crops out along Five Mile Creek southwest of the Site. The Austin Chalk yields only small quantities of water, and then in only small local areas (Nordstrom, 1982).

According to information acquired from the Soil Conservation Service's State Soil Geographic Database, soil at the Site is part of the Austin Soil Series. Also, the United States Department of Agriculture (USDA), Soil Conservation Service *Soil Survey of Dallas County, Texas*, depicts the Site as being in the Austin Soil Series (Austin), but

divides the Austin into a number of specific soils. The Site is developed on two soil types: the Lewisville-Urban land complex (southwest one-third of Site) and the Houston Black-Urban land complex.

Lewisville-Urban land and Houston Black-Urban land soils are generally moderately deep, well drained clayey soils that have slopes that range from 0 to 4%. The soils have high corrosion potential and are not classified as hydric. Lewisville-Urban land soils are typically brown, fine-grained silty and clayey soils. Houston Black-Urban land soils are typically dark gray to black, fine-grained clayey soils. The two soils average 70 to 75 inches thick, according to the USDA soil survey. Soil boring logs generated by the USAR prior to modifying Site buildings were reviewed and indicate that soils are 9 to 12 feet thick at the Site and rest on the Austin Chalk Formation.

No water wells were identified on the Site or within one mile of the Site in the environmental database report. Environmental Data Resources, Inc.'s (EDR) proprietary AQUIFLOW Information System did not provide groundwater flow data at the Site. However, it did report that groundwater flows southeast at one-eighth to one-quarter mile to the south. Based on the topography of the Site, groundwater at the Site is expected to flow south toward Five Mile Creek.

2.5 SITE UTILITIES

TXU Energy provides electricity to the Site. Water and sanitary sewer service are provided by the city of Dallas. Solid waste is transferred to the municipal landfill by Laidlaw. Natural gas is supplied by Atmos Energy.

2.6 WATER SUPPLY WELLS AND SEPTIC SYSTEMS

Based on a review of historical Site and agency records, interviews with USAR personnel, Site reconnaissance, and a review of the Texas Water Development Board (TWDB) groundwater information database, no water supply wells, groundwater monitoring wells, or septic systems are or have been at the Site.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Land titles for the Site were reviewed back to 1902. Appendix C contains the historical chain-of-title report for the Site. The legal description of the Site was provided in Section 2.2. The historical chain-of-title report lists the following deed transfer within the past 60 years:

- May 21, 1969 — Byrd White, Executor of the Estate of Lou White, deceased, to United States of America

No leases, environmental liens, institutional controls, or engineering controls of record were found against the USAR Center property.

3.2 PAST USES AND OPERATIONS

Table 1 summarizes the important events in the facility's development, administration, and mission.

Table 1
Historical Summary of the William Herzog Memorial USAR Center

Year	Description
1957	The main office wing and Assembly Hall section of the Administration Building and the OMS were constructed.
1963	The VWR was installed.
1969	Property deeded to United States of America.
1958-1973	North storage wing of the Administration Building was constructed.
1979	OWS was installed.
1985	Southeast wing of Administration Building was constructed.
1984-1996	The MEP lot was paved with concrete.

The current tenants of the USAR Center mobilized to the Site in 2006. The Site was most recently occupied by the 493rd Engineer Group and A Company, 980th Engineer Battalion. The 493rd Engineer Group and A Company, 980th Engineer Battalion, occupied the USAR Center for approximately 20 years and vacated it in 2005. Before that, the USAR Center tenants included the 2nd Battalion, 381st Regiment, 75th Division, and the D Company, 980th Engineer Battalion. No lease agreements or other information were available to the TEJV to indicate the Site tenants from 1957 to 1969, when the property was deeded to the United States of America.

Historical aerial photographs and topographic maps provided information about the Site and surrounding area. Figures 5 through 10 in Appendix A present aerial photographs of the Site and surrounding area dated 1942, 1958, 1973, 1984, 1996, and 2001, respectively. Figures 11 through 17 in Appendix A present topographic maps of the Site and surrounding areas dated 1893, 1958, 1968, 1973, 1978, 1981, and 1995, respectively.

Pertinent observations on the historical aerial photographs are summarized below.

- **1942 (Figure 5).** This photograph shows the Site undeveloped in 1942. The Site and adjacent properties are part of a large parcel of agricultural land. The surrounding properties to the north, east, and south are agricultural, and properties to the west are developed commercially and residentially.

- **1958 (Figure 6).** This photograph shows the Building and the OMS had been constructed at the Site. At that time, the Administration Building consisted of the main office wing and Assembly Hall. The adjacent properties to the north, east, and south were undeveloped. The Veterans Administration (VA) hospital was constructed approximately 1,500 feet north of the Site, and the land between the Site and VA hospital remained agricultural. Several roads were constructed east of the Site, and that property was no longer agricultural. The properties south and west of the Site were commercial and residential.

- **1973 (Figure 7).** This photograph shows the north storage wing of the Administration Building, indicating it was constructed some time between 1958 and 1973. The current Oak Glen Apartments, self-serve car wash, and funeral home were present to the north of the Site; the current residential subdivision was present to the east of the Site; the Regency Village Apartments were present to the south of the Site; and the commercial and residential areas west of the Site resembled current development.

- **1984 (Figure 8).** This photograph does not show any changes from Figure 7 for the Site or surrounding properties.

- **1996 (Figure 9).** This photograph shows that the southeast wing had been added to the Administration Building since 1984. The MEP lot had also been paved with concrete during that period. No changes are noted from Figure 8 for surrounding properties.

- **2001 (Figure 10).** This photograph does not show any changes from Figure 9 for the Site or surrounding properties.

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

- **1893 (Figure 11).** This topographic map is produced at a scale of 1:125,000 and shows the Site in the Trinity River watershed. This map cannot be used to determine Site development because the scale shows city blocks but not individual buildings. Five Mile Creek is visible so the general area of the USAR Center can be estimated. No development in the area has occurred.

- **1958 (Figure 12).** This topographic map shows the Administration Building and OMS. A series of four northwest-southeast trending roads are present. The southwestern-most road passes between the Administration Building and OMS. The area between the USAR Center and the VA Hospital appears to be undeveloped.

- **1968 (Figure 13).** This topographic map shows the area northeast of the USAR Center to be developed with residences. The four streets on the 1958 map are no longer present and have been reconfigured for the residential area.

- **1973 (Figure 14).** This topographic map is essentially the same as the 1968 map, except the Administration Building is shown but the OMS is not. Street and buildings depicted on the 1973 map show little changed from the 1968 map.

- **1978 (Figure 15).** This topographic map has a scale of 1:50,000. At this scale, the VA Hospital is visible, but the USAR Center is not. The driveway adjacent to the northwest side of the Site is visible. Streets, parks, and topographic features in the vicinity of the Site are essentially the same as in the 1973 map.

- **1981 (Figure 16).** This topographic map shows the Administration Building, but not the OMS. Streets and driveways between the USAR Center and Ledbetter Road to the southeast have been constructed.

- **1995 (Figure 17).** This topographic map does not show any changes from the 1981 map to the Site or the surrounding properties.

Available business directories, including *Worley's City Directory*, *Polk's City Directory*, and *Cole's City Directory*, were reviewed by EDR (EDR's research spanned roughly five-year intervals between 1921 through 2005). The "U.S. Army Reserve Center" is listed at 4900 South Lancaster in the 1971 *Polk's City Directory*, but was not identified in the 1966 or previous city directories. No properties were identified on the east side of the 4900 block of South Lancaster prior to 1971. The "Herzog Army Reserve Center" was also listed in city directories in 1977, 1981, 1986, and 1991, but not in 1996 or 2000.

No historical Sanborn fire insurance maps were available for the Site.

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

Chemicals formerly used and stored at the Site were associated with vehicle and facility maintenance activities and janitorial services. Janitorial chemicals and building maintenance-related products were stored in the designated storage area within the janitorial closet in the Administration Building.

A 1998 Historical Architectural Report (Parsons, 1998) contained a September 13, 1989, map (referred to in that report as Figure 23) of waste site locations. That map shows:

1 — VWR in the MEP lot north of the OMS

2 — Indoor Firing Range (IFR) in the Administration Building, which was unused during the Site reconnaissance

The 493rd Engineer Group and A Company, 980th Engineer Battalion stored hazardous materials (hazmat) in a hazmat building in the MEP lot. As discussed in an August 2005 Environmental Baseline Survey (EBS), discussed further in Section 3.5.1, the hazmat building was used for storing petroleum, oils, and lubricants (POLs), antifreeze, degreasers, paints, and paint thinners. The 2005 EBS reported that housekeeping was orderly in the hazmat building, and that no leaks or spills were observed. The hazmat building was removed from the Site when the former USAR tenants vacated the Site in 2005.

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 their 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 hazardous materials or hazardous wastes has not occurred at the Site.

The Site has a VWR that was installed in 1979 (Photograph 14 in Appendix B) and includes a catch basin, sediment trap, and 1,436-gallon OWS (EnSafe, 2000). The OWS receives wash water only from the VWR and discharges it to the city of Dallas sanitary sewer. During a 2000 OWS evaluation (discussed further in Section 3.5.8), EnSafe found sludge in both chambers of the OWS and was told that the OWS had not been cleaned out since 1997. The 2000 OWS evaluation indicated that the VWR was no longer used at the Site because vehicles were washed at the Seagoville USAR Center instead. Neither the VWR

nor the OWS were in use during the Site reconnaissance, and no records were identified that showed that the OWS had been inspected or cleaned since the 2000 OWS evaluation.

The OMS was used for vehicle maintenance by the 493rd Engineer Group and A Company, 980th Engineer Battalion. POL stains were observed on the concrete floor of the OMS during the Site reconnaissance. As shown in Photograph 24 in Appendix B, a forklift was leaking fluids. Sorbent material had been placed over many of the POL stains, as shown in Photograph 26 in Appendix B. Some staining was observed on the floor in the Administration Building mechanical rooms. Photograph 19 in Appendix B shows POL staining beneath an air compressor in the Administration Building.

An IFR was formerly located on the second floor of the Administration Building. The IFR was a small arms range that had associated lead dust near the bullet deflector. As described in Section 3.5.9, the Thompson Professional Group, Inc., evaluated the IFR in 1995. Samples collected in December 1995 satisfied alternative use criteria and the 90th Regional Readiness Command (RRC) notified the facility manager on May 20, 1996, that the space had passed the clearance criteria for alternate use as a storage room only. The former IFR room was vacant during the Site reconnaissance.

The Administration Building also includes an inactive dark room, which is shown in Figure 4 in Appendix A. No photographic developing equipment or chemicals were observed during the Site reconnaissance, and USAR personnel were unfamiliar with its former use or dates of operation. It is not known how the photographic developing solutions were disposed, but the rinse water was presumably discharged to the sanitary sewer. No information was provided to the TEJV to verify this assumption.

EnviroSolve, LLC has been contracted to pick up and dispose of used chemicals and wastes from the Site. The authorized transporter has USEPA ID number OKD987084068 and the authorized treatment, storage, and disposal (TSD) facility has USEPA ID number OK2924000000.

3.4 PAST BULK PETROLEUM STORAGE TANKS

Based upon a review of available Site records, a search of federal and state environmental databases, and interviews with USAR personnel, it does not appear that aboveground storage tanks (ASTs) or underground storage tanks (USTs) have been at the Site.

3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

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

3.5.1 Environmental Baseline Survey Report

An EBS of the Site was completed by Environmental, Compliance & Construction, Inc. (ECCI) in August 2005 for the USAR, 90th RRC. Titled *Environmental Baseline Survey, William Herzog Memorial USARC*, the EBS summarizes general information about the Site. "In accordance with the ASTM Standard D 5746-98 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 1 Property. An ECP Area Type 1 Property is 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.

3.5.2 Architectural Assessment Report

Parsons Engineering Science, Inc. (Parsons) performed an assessment and prepared a *Historic Architectural Resources Assessment of the 90th Regional Support Command Facilities in Texas* for the Department of the Army. The findings of the assessment were compiled in a report issued in February 1998. The report stated that the date of construction for the USAR Center buildings was 1957. The report concluded that the buildings on the Site were not eligible for placement on the National Register of Historic Places because they did not meet the 50-year age criteria and they did not appear to possess exceptional historical importance.

The architectural assessment report contained a map (referred to in that report as Figure 23) dated September 13, 1989. This figure showed an "U.S. Army Reserve Center," an "Indoor Firing Range," a "Storage Building," a "Vehicle Wash Rack," and areas for "Privately Owned Vehicle Parking," and "Military Vehicle Parking."

3.5.3 Lead-Based Paint Report

In September 1994, Thompson Professional Group, Inc. performed a LBP assessment of the Site. The results were summarized in the *Asbestos and Lead-Based Paint Survey and Asbestos Management Plan Herzog USARC Dallas, Texas* issued in August 1995. The assessment documented materials/surfaces containing LBP in the USAR Center.

Positive test results for LBP were identified at 12 locations at the USAR Center. LBP was found in the Administration Building on exterior red doors and door frames, exterior iron rain downspouts, exterior white support columns, and exterior pink supply room vents. In the OMS, LBP was found on several interior doors and door frames, the overhead doors and frames, exterior brick protectors, exterior cooling unit 36, exterior iron rain downspouts, and exterior metal doors. The LBP found at both the Administration Building and OMS was categorized as "weathered" to "extremely deteriorated." No recommendations for this LBP or information on its abatement were provided to the TEJV.

3.5.4 Radon Report

An August 29, 1994, memorandum from the Headquarters, 90th RRC, to the USAR Center published the results of radon testing that took place at the facility. Air samples were collected and tested from five rooms in the Administration Building during that sampling event. Sample results ranged from 0.9 to 3.8 picocuries per liter (pCi/L), with an average of 2.4 pCi/L.

Further radon assessment was performed by the 90th RRC during October 2000, with the results published in the *Radon Building Survey, Herzog U.S. Army Reserve Center Dallas, Texas,* October 2000. Nine samples were collected from the Administration Building and one sample from the OMS. Sample results ranged from 0.6 to 2.2 pCi/L.

3.5.5 Asbestos Report

Two asbestos inspections have been performed at the Site. In September 1994, the Thompson Professional Group, Inc. performed an asbestos assessment summarized in the *Asbestos and Lead-Based Paint Survey and Asbestos Management Plan, Herzog USARC Dallas, Texas* issued in August 1995. The assessment revealed that both the Administration Building and OMS have asbestos-containing material (ACM) in various locations, including several areas of pipe insulation (attic spaces and mechanical room) and tile mastic in the Administration Building, and an area of pipe insulation in the OMS. In both the Administration Building and OMS, the pipe insulation was classified friable. The floor tile mastic in the Administration Building was classified non-friable. The report recommended that re-inspection be performed every six months to reevaluate the condition of the ACM identified in each building.

In 1998, the 90th RRC performed a second asbestos evaluation at the Site. The results were published in the *Asbestos Building Re-inspection, William Herzog U.S. Army Reserve Center, Dallas, Texas* in May 1998. That inspection noted that some pipes in the mechanical room of the Administration Building had insulation labeled as containing asbestos. The insulation was damaged, but had a low probability of disturbance. Mudded joints not mentioned in the previous survey were assumed to contain ACM. The joint insulation in the Administration Building was damaged, with a high probability for disturbance due to contact. Pipe runs above the drop ceiling in the Administration Building appeared to be in good condition, with a high probability for ACM disturbance due to air erosion. Asbestos-containing floor tile mastic was undisturbed in most areas of the Administration Building, but was classified as damaged with a high probability for disturbance due to accessibility.

The OMS was noted to have over 200 linear feet of corrugated ACM pipe wrap with asbestos-containing mudded joints. Most of the piping in the OMS had a low probability for disturbance, with one area (location not stated) noted to have a high probability of disturbance. An assumed asbestos-containing vibration collar in the OMS was noted to have a high probability for disturbance due to air erosion. The re-inspection concluded that

any removal action performed must comply with all state, federal, and local regulations, and that the 90th RRC should be notified concerning any removal or disturbance of ACM.

3.5.6 Cultural Resources Report

Parsons prepared two reports: *Archaeological Assessment and Reconnaissance of 90th Regional Support Command Facilities in Texas* and *Management Summary, Cultural Resources Assessment of 90th Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas* in February 1998. The assessments were performed in 1998 by conducting a records search of the National Register of Historic Places — the official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture. No archaeological or historical sites were found on the Site. The current structures were built in 1957 and were not considered eligible for recommendation to the register because they did not meet the 50-year age criteria.

3.5.7 Polychlorinated Biphenyls Report

The U.S. Army Center for Health Promotion and Preventive Medicine performed a *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97* and issued the report on September 30, 1997. The assessment addressed the PMTs at the Site. Three PMTs are on a single power pole located on the west side of the facility along South Lancaster Road (Photograph 31 in Appendix B). The report identified those PMTs as owned by TXU Energy. The report stated that the manufacturer of those transformers was General Electric. Their age was unknown; however, at the time of the 1997 assessment, they were in good condition and had no leaks. The 1997 report stated the transformers were non-PCB-containing. The report also stated that none of the fluorescent light fixtures had PCB ballasts.

3.5.8 Oil-Water Separator Evaluation Report

According to the May 5, 2000, *Oil-Water Separator Evaluation* performed by EnSafe Inc., the 1,436-gallon OWS at the Site has two chambers: an influent chamber that receives wastewater from the VWR and an effluent chamber connected to the sanitary sewer. A sediment trap at the center of the wash rack reduces the amount of sediment entering the OWS. The OWS is shown in Photograph 14 in Appendix B.

According to the report, USAR personnel stated that the OWS was installed on an unknown date, but at the approximate time the facility was expanded in 1979. No references to the OWS were noted on available facility drawings dated before 1979. No OWS construction or design diagrams were available for review by EnSafe personnel at the time of the evaluation. The evaluation noted the presence of 6 inches and 3 inches of sludge in the influent and effluent chambers, respectively, of the OWS. No oil or hydrocarbons were noted in either chamber. The 2-inch effluent pipe was assumed to discharge to the sanitary sewer system, but appeared to be blocked. EnSafe was told that the OWS had not been

cleaned since 1997, and that the vehicle wash pad at the USAR Center was no longer used (vehicles were washed at the Seagoville USAR Center).

The following recommendations were proposed in EnSafe's report:

- Evaluate whether the OWS should be abandoned or removed
- Clear the obstruction from the discharge pipe
- Clean the remaining sludge from the OWS
- Establish a routine for maintenance of the OWS
- Inspect the OWS system annually
- Develop a Site-specific written program that describes procedures and management practices used to ensure compliance with the Clean Water Act.

The TEJV was provided no information as to whether those recommendations were implemented.

According to EnSafe, the city of Dallas did not require a permit or sewer use agreement for facilities that discharged less than 25,000 gallons per day, but it did limit discharge of oil and grease concentrations to 100 milligrams per liter (mg/L). No monitoring or reporting was required. According to EDR, this OWS is registered as a PST with TCEQ under Facility ID 0069232.

3.5.9 Indoor Firing Range Report

Along with its evaluation for LBP and asbestos, the Thompson Professional Group, Inc. also evaluated the IFR formerly in the Administration Building. With the LBP and asbestos information, the firing range evaluation was discussed in the *Asbestos and Lead-Based Paint Survey and Asbestos Management Plan Herzog USARC Dallas, Texas*, issued in August 1995. The report stated that two wipe tests indicated the presence of hazardous levels of lead dust on the floor of the firing range, near the bullet deflector. Two air samples from the firing range indicated that occupant exposure to lead dust in the air was insignificant.

ETC Engineers collected wipe samples from the IFR in December 1995. Eighteen wipe samples were collected, with the sample results of lead per wipe up to 0.04 micrograms per square foot (µg/ft^2). The average sample results were 0.0073 µg/ft^2 of lead per wipe. The results were attached to a Memorandum for the Facility Manager from the Headquarters, 90th RRC, dated May 20, 1996. This memorandum stated that, based on the lead sampling results, the facility was allowed to convert the IFR for alternate use as a storage room only.

4.0 ADJACENT PROPERTIES

Figure 10 in Appendix A provides a 2001 aerial view of the Site and adjacent properties. The Site is bounded by the four-lane, divided South Lancaster Road to the west. East and west bound lanes are separated by the Dallas Area Rapid Transit, which operates a public transportation train (Photograph 30 in Appendix B). Properties (from south to north) across Lancaster Road from the Site include: Sonic Restaurant, a vacant lot, an abandoned car lot, and a retail strip shopping center. The backyards of multiple single-family residences abut the Site on the east. A car wash abuts the west half of the north Site boundary (Photograph 10 in Appendix B), and an apartment complex abuts the east half. A vacant property abuts the USAR Center to the south. The vacant property was most recently an apartment complex that was destroyed by a tornado. The concrete foundations are still present, but debris from the structures has been removed (Photograph 11 in Appendix B). Table 2 provides a list of adjacent properties with their direction from the Site.

Table 2
List of Adjacent Properties

Direction From Site	Name/Type of Property	Address	Zoning
North	Commercial car wash business	4846 South Lancaster Dallas, Texas	CR, Commercial Retail
North	Oak Glen Apartments	2120 52nd Street	P(A), Parking
East	Residential single-family housing	Eastgate Circle	R-7.5(A), Single Family Residential
South	Former “Regency Village Apartments,” currently owned by the city of Dallas. Apartments were destroyed by a tornado and the property has been cleared except for the foundations and pavement.	4920 South Lancaster Dallas, Texas	CR, Commercial Retail
West	Vacant lot, abandoned car lot, strip shopping center	4900 Block South Lancaster, west side of road	CR, Commercial Retail

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 surrounding 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 was obtained from EDR on July 18, 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.

There were no environmental permits issued for the Site; therefore, there were no permit applications or associated permit documentation available for review. There were no known contamination events on the Site that required an environmental cleanup; therefore, the Site did not participate in the Installation Restoration Program, Military Munitions Response Program, or a Compliance Cleanup program.

The TEJV interviewed local authorities and reviewed reasonably accessible USAR environmental documents, TCEQ and TWDB files, city of Dallas records, and historical aerial photographs and topographic 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.

The TEJV conducted multiple interviews with relevant personnel to discuss general environmental interests and specific areas of interest identified during the records review and Site 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 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 a NPL site and there are no such sites located 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 CERCLA. 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.

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 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 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 or CERCLIS NFRAP site and there are no such sites located within one-half mile of the Site.

5.1.3 Resource Conservation and Recovery Act Corrective Action Sites within One Mile

Resource Conservation and Recovery Act (RCRA) Corrective Action Sites (CORRACTS) identifies hazardous waste handlers with RCRA corrective action activity. According to the environmental database report, the USAR Center is not a CORRACTS and there are no such sites located with one mile of the Site.

5.1.4 RCRA Transport, Treatment, Storage, and Disposal Facilities within One-Half Mile

The RCRA Information Database is USEPA's comprehensive information system that includes selective data on facilities that generate, transport, and TSD of hazardous waste, as defined by RCRA. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. According to the environmental database report, the USAR Center is not a RCRA TSD facility, and there are no such facilities located within one-half mile of the Site.

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

Conditionally exempt small-quantity generators (CESQG) 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 and 1,000 kg of hazardous waste per month, while a large-quantity generators (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 (USEPA ID TXR000034439). A March 2005 hazardous waste manifest, the only manifest found in USAR files, indicated the disposal of paint waste and a solid material which was hazardous for chromium content. No RCRA SQGs or LQGs are within one-quarter mile of the Site.

5.1.6 Federal Emergency Response Notification System List

The 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 on the ERNS List.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented below was obtained from the regulatory database search report and TCEQ. Supplemental information was provided from proprietary EDR databases.

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

Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. The Closed Landfill Inventory lists closed and abandoned landfills (permitted as well as unauthorized) across the State of Texas. The TCEQ maintains databases of Permitted Solid Waste Facilities and the Closed Landfill Inventory. According to the environmental database report, there are no permitted solid waste facilities or closed landfills located within one-half mile of the Site.

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

The TCEQ maintains the Leaking PST (LPST) Database. The environmental database report identified five LPST sites within one-half mile of the USAR Center. Table 3 summarizes information about the five LPST sites.

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 TCEQ maintains the PST Database. According to the environmental database report, the USAR Center has one oil-water separator registered as a UST. There are four registered UST sites within one-quarter mile of the USAR Center. Table 4 details the registered UST sites, including the USAR Center.

Table 3
Leaking PSTs within One-Half Mile of the USAR Center

Facility	Relative Location	Description
12EBV 5025 South Lancaster Dallas, Texas Facility ID No. 0017475	Approximately 293 feet south of Site. Lower elevation than Site.	The property is on the northwest corner of the intersection of Ledbetter and South Lancaster, and a Jack in the Box restaurant occupied the property during the Site reconnaissance. A LPST was reported on March 8, 1989, and assigned LPST ID No. 092742. The leak is reported to have impacted groundwater but there are no apparent threats or impacts to receptors. The TCEQ issued a final concurrence and the case was closed.
King Food Store 2103 East Ledbetter Dallas, Texas Facility ID No. 0009101	Approximately 651 feet south-southeast of Site. Lower elevation than Site.	The property is on the northeast corner of the intersection of Ledbetter and South Lancaster, and a Metro PCS cell phone business occupied the property during the Site reconnaissance. An LPST was reported on February 13, 1992, and assigned LPST ID No. 102223. The leak is reported to have impacted soil only. The TCEQ issued a final concurrence and the case was closed. A second LPST was reported on December 11, 1998, and assigned LPST ID No. 113872. The leak is reported to have impacted groundwater but there are no apparent threats or impacts to receptors. The TCEQ issued a final concurrence and the case was closed.
Shell Station 2104 East Ledbetter Dallas, Texas Facility ID No. 0033142	Approximately 703 feet south-southeast of Site. Lower elevation than Site.	The property is on the southeast corner of the intersection of Ledbetter and South Lancaster, and a Texaco gas station occupied the property during the Site reconnaissance. A LPST was reported on August 19, 2004, and assigned LPST ID No. 116257. The assessment is reported to be incomplete, but there are no apparent threats or impacts to receptors. The TCEQ status is "pre-assessment/release determination."
Conoco Food Mart 312 5101 South Lancaster Dallas, Texas Facility ID No. 0014923	Approximately 792 feet south-southeast of Site. Lower elevation than Site.	The property is on the southwest corner of the intersection of Ledbetter and South Lancaster, and a Walgreens drug store occupied the property during the Site reconnaissance. An LPST was reported on March 2, 1992, and assigned LPST ID No. 102022. The leak is reported to have impacted soil only. The TCEQ issued a final concurrence and the case was closed.

Table 3
Leaking PSTs within One-Half Mile of the USAR Center

Facility	Relative Location	Description
Veterans Administration Medical Center 4500 South Lancaster Dallas, Texas Facility ID No. 0014923	Approximately 1,492 feet north-northwest of Site. Higher elevation than Site.	An LPST was reported on December 4, 1989, and assigned LPST ID No. 094768. The leak is reported to not have impacted groundwater or threaten or impact receptors. The TCEQ issued a final concurrence and the case was closed. A second LPST was reported on May 20, 1992, and assigned LPST ID No. 103133. The leak is reported to have not impacted groundwater or threaten or impact receptors. The TCEQ issued a final concurrence and the case was closed.

Table 4
Underground Storage Tanks within One-Quarter Mile of the USAR Center

Facility	Relative Location	Description
William Herzog Memorial USAR Center 4900 South Lancaster Dallas, Texas Facility ID No. 0069232	Site	Site contains a 1,436-gallon OWS. The OWS is connected to the wash rack and is shown in Photographs 13 and 14 in Appendix B.
12EBV 5025 South Lancaster Dallas, Texas Facility ID No. 0017475	Approximately 293 feet south of Site. Lower elevation than Site.	The property is on the northwest corner of the intersection of Ledbetter and South Lancaster, and a Jack in the Box restaurant occupied the property during the Site reconnaissance. Three gasoline USTs were installed in 1961 (550, 4,000, and 6,000 gallon capacities) and two 6,000-gallon gasoline USTs were installed in 1971 and 1975. All five USTs were removed in December 1988.
King Food Store 2103 East. Ledbetter Dallas, Texas Facility ID No. 0009101	Approximately 651 feet south-southeast of Site. Lower elevation than Site.	The property is on the northeast corner of the intersection of Ledbetter and South Lancaster, and a “Metro PCS” cell phone business occupied the property during the Site reconnaissance. Three 12,000-gallon gasoline USTs were installed in 1984 and removed in November 1991. Two 10,000-gallon gasoline USTs were installed in 1993 and removed in September 2003.
Ledbetter Texaco 2104 East Ledbetter Dallas, Texas Facility ID No. 0033142	Approximately 703 feet south-southeast of Site. Lower elevation than Site.	The property is on the southeast corner of the intersection of Ledbetter and South Lancaster. Two 10,000-gallon gasoline USTs and one 8,000-gallon USTs were installed in 1970 and are currently in use. A 500-gallon UST was also installed in 1970, but was removed in January 1980.
Conoco Food Mart 312 5101 South Lancaster Dallas, Texas Facility ID No. 0014923	Approximately 792 feet south-southeast of Site. Lower elevation than Site.	The property is on the southwest corner of the intersection of Ledbetter and South Lancaster, and a Walgreens drug store occupied the property during the Site reconnaissance. Three 10,000-gallon gasoline USTs were installed in 1984 and removed in September 1994.
City of Dallas No. 25 Fire Station 4607 South Lancaster Dallas, Texas Facility ID No. 0031268	Approximately 1,241 feet north-northwest of Site. Higher elevation than Site.	A 560-gallon gasoline UST was installed in 1964 and removed from the ground in December 1988. A 1,000-gallon gasoline UST was installed in 1980 and removed in September 1989. A 1,000-gallon gasoline UST was installed in 1986 and removed in October 2002.

5.2.4 State-Registered AST Sites within One-Quarter Mile

The TCEQ's PST Database also contains registered ASTs. According to the environmental database search report, there are no registered AST sites located within one-quarter mile of the Site.

5.2.5 State Spills Incidents

The TCEQ maintains a Spills Database. According to the environmental database search report, the USAR Center is not listed in the TCEQ Spills Database.

5.2.6 State Voluntary Cleanup Program Sites within One-Half Mile

The Texas Voluntary Cleanup Program (VCP) was established to provide administrative, technical, and legal incentives to encourage the cleanup of contaminated sites in Texas. The TCEQ and the Texas Railroad Commission maintains databases. The Texas Railroad Commission's VCP database 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 VCP sites located within one-half mile of the Site, and the USAR Center is not listed in the state VCP list.

5.2.7 State Brownfields Program Sites within One-Half Mile

Included in the listing are brownfields properties addressed by Cooperative Agreement Recipients and brownfields properties targeted by Targeted Brownfields Assessments (TBA). 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. The TCEQ maintains a Brownfields Site Assessment database. According to the environmental database report, there are no Brownfields sites located within one-half mile of the Site, and the USAR Center is not listed on the state brownfields list.

5.2.8 State Sites with Engineering and 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 on site. Deed restrictions are generally required as part of the

institutional controls. The TCEQ maintains a database of sites with activity and use limitations. According to the environmental database report, there are no sites with engineering or institutional controls located within one-half mile of the Site.

5.2.9 State Dry-Cleaning Facilities within One-Quarter Mile

The TCEQ maintains a database of state-registered dry-cleaning facilities. According to the environmental database report, there are no dry-cleaning facilities located within one-quarter mile of the Site.

5.2.10 State Industrial and Hazardous Waste Database

The TCEQ maintains an Industrial and Hazardous Waste (IHW) Database, which is developed from summary reports reported by waste handlers, generators, and shippers in Texas. According to the environmental database report, the USAR Center is not listed on the IHW Database.

5.2.11 State Commercial Hazardous and Solid Waste Management Facilities Listing

The TCEQ maintains a Commercial Hazardous and Solid Waste Management Facilities Listing that includes commercial recycling facilities and facilities permitted or authorized (interim status) by the TCEQ. According to the environmental database report, the Site is not listed on the Commercial Hazardous and Solid Waste Management Facilities Listing.

5.2.12 Innocent Owner/Operator Program

The TCEQ maintains the Innocent Owner/Operator Program (IOP) Database, which contains information on all sites that are in the IOP. An IOP landowner is an innocent owner or operator whose property is contaminated as a result of a release or migration of contaminants from a source or sources not located on the property, and they did not cause or contribute to the source or sources of contamination. According to the environmental database report, the Site is not in the IOP Database.

5.2.13 State Superfund Sites within One Mile

The TCEQ maintains a State Superfund Registry database that includes listed and de-listed state Superfund sites. These sites may or may not already be listed on the federal CERCLIS. Priority sites planned for cleanup using status funds are identified along with sites where cleanup will be paid for by potentially responsible parties. According to the environmental database report, there are no listed or de-listed state Superfund sites located within one mile of the Site.

5.2.14 State Current Emission Inventory Database

The TCEQ maintains the Current Emission Inventory Database that lists, by company, actual emissions and TCEQ air accounts that emit USEPA criteria pollutants. According to the environmental database report, the Site is not in the Current Emission Inventory Database.

5.2.15 State Notice of Violations Listing

The TCEQ maintains a Notice of Violations (NOV) Listing for permit violations. According to the environmental database report, the USAR Center is not in the NOV Listing.

5.2.16 State Edwards Aquifer Permits

The Edward Aquifer Protection Program database provides information for counties located within the Austin Region (Hays, Travis, and Williamson counties). The Site is not within the Edwards Aquifer zone.

5.2.17 State Environmental Liens Listing

The state maintains an Environmental Liens Listing, which includes TCEQ liens placed against either State Superfund sites or Federal Superfund sites to recover costs incurred by TCEQ. According to the environmental database report, the USAR Center is not in the Environmental Liens Listing.

5.2.18 Proprietary Manufactured Gas Plant Sites within One Mile

EDR maintains a proprietary Manufactured Gas Plants database. The database includes records of coal gas plants (manufactured gas plants) compiled by EDR. Manufactured gas sites were used in the United States from the 1800s to 1950s to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludge, oils, and other compounds are potentially hazardous to human health and the environment. The by-product from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination. According to the environmental database report, there are no manufactured gas plants located within one mile of the Site.

5.2.19 Proprietary Historical Auto Stations and Dry Cleaners

EDR maintains proprietary databases of historical auto stations and dry cleaners, which were compiled from selected national collections of business directories. Historical gas stations include gas, gas station, filling station, auto, automobile repair, auto service station, and service station businesses; historical dry cleaners include dry cleaners, cleaners, laundry, Laundromat, cleaning/laundry, wash and dry businesses. According to

the environmental database report, the USAR Center is not in the either of these databases.

5.3 TRIBAL ENVIRONMENTAL RECORDS

According to the environmental database report, there are no Indian administered lands greater than 640 acres located within one mile of the Site or USTs on Indian Land located within one-quarter mile of the Site.

5.4 UNMAPPED SITES

The environmental database report identified 24 unmapped sites. Unmapped sites are those with address information sufficient only to identify as within the zip code of the target Site. Further research was conducted using the mapping utilities provided at maps.google.com and yp.yahoo.com. None of the orphaned sites were found to be within the ASTM-defined minimum search distance from the Site 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 Section 5.0, multiple databases and sites were reviewed to evaluate potential risks to the Site. As summarized in Section 5.2.2, there have been reported LPSTs at all four corners of the intersection of Ledbetter and South Lancaster, which is approximately 500 feet south of the USAR Center. At three of the sites, the TCEQ issued final concurrences and the cases are closed. All USTs have been removed from the ground at those three sites and the properties have been redeveloped as non-fueling operations businesses.

The Texaco station at 2104 East Ledbetter has two 10,000-gallon and one 8,000-gallon USTs in operation. The leaking UST has an incomplete assessment, but there are reported to be no apparent threats or impacts to receptors. TCEQ has not issued a final concurrence for this facility. The Texaco station is approximately 700 feet south-southeast of the USAR Center, and is topographically lower than the Site.

Although records were not found in federal, state, and proprietary environmental databases, several businesses have operated near the USAR Center that have operations that may have had associated environmental impacts. Available business directories including *Worley's City Directory*, *Polk's City Directory*, and *Cole's City Directory* were reviewed by EDR (EDR's research spanned roughly five-year intervals between 1921 through 2005). Table 5 lists historical businesses near the USAR Center that may potentially have had an undocumented environmental impact.

Table 5
Historical Businesses within a One Block Radius of the William Herzog Memorial USAR Center

Business	Address	Years Identified
Foamy Brush Car Wash	4811 South Lancaster	1986, 1991
Howard's Sinclair Service Station	4822 South Lancaster	1971
Ewer's Motor Co. Used Cars	4835 South Lancaster	1977, 1981, 1986
Car Wash	4838 South Lancaster	1991
Mitchell's Cleaners	4909 South Lancaster	1956
D&C Autos	4920 South Lancaster	2005
Texas Auto Sale Used	4921 South Lancaster	1977, 1981, 1986, 1991, 1996, 2000
Service Station	4969 South Lancaster	1941, 1946
Ray & Son's Garage/Auto Repair	5003 South Lancaster	1956, 1971, 1977, 1981, 1986, 1991, 1996, 2000, 2005
Ray's Tire Shop	5011 South Lancaster	1977, 1981, 1986
Mobile Service Station	5025 South Lancaster	1971, 1977, 1981, 1986
Green W R Service Station	5027 South Lancaster	1956
Service	2014 Kingsley Drive	1966

Based on an evaluation of available information and details concerning the identified sites, all potential properties of concern are considered to represent low risks to the Site, based on regulator closure of a property, distance from the Site, and/or lack of documented releases on the sites. No "High Risk" sites were identified near the USAR Center. "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site. However, the Site is in an area with a history of commercial development with operations of potential concern including bulk fuel storage, drycleaning, and automotive body shop/engine repair. These operations are expected to have used and stored bulk quantities of CERCLA hazardous substances and/or petroleum products, although no evidence of releases was identified.

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

Findings documented in the following subsections are based on TEJV's Site reconnaissance, a review of available Site records, and information obtained from USAR personnel.

6.1 USTs/ASTs

The USAR Center does not currently have any bulk petroleum ASTs. As discussed in Section 3.5.8, the Site has an OWS that was installed in 1979 (Photograph 14 in Appendix B). The OWS is registered with the TCEQ as a PST. Table 6 provides the information for this OWS from the TCEQ PST Registration Database. The 1,436-gallon OWS receives wash water from the VWR in the MEP lot and discharges to the city of Dallas sanitary sewer.

Table 6
TCEQ PST Registration Database Record Information

Facility ID	69232
Facility name	William Herzog Memorial US Army Reserve Center
Address	4900 South Lancaster, Dallas, Texas 75216
Date registered	January 21, 1997
TCEQ region	4, Arlington
County	Dallas
Facility type	Not provided
Non-attainment area	Yes
Number of USTs	1
Number of ASTs	0
Manager/Title	Mr. Willson
Phone	214-371-7177
Signature/Title	Teddy B. Baer, Col., USAR
Date signed	January 21, 1997
Owner effective begin date	July 1, 1996

The August 2005 EBS indicated that the city of Dallas does not require a discharge permit because the facility is not a significant industrial user, as defined by the Clean Water Act. The EBS states that the city of Dallas imposes a 100 mg/L oil and grease effluent limit, but there are no sampling and reporting requirements.

The VWR and OWS were not in use during the Site reconnaissance, there were no signs of POL staining in the VWR area, and a canopy was present over the VWR which was not covered during the 2000 inspection. Site personnel did not know if the OWS had been used since the 2000 OWS evaluation report. No records were identified to indicate that the OWS had been inspected or cleaned since 2000, and an OWS operations and

maintenance plan was not available at the Site. During the Site reconnaissance, USAR personnel stated that the OWS was "cleared for use," and indicated the 490th Civil Affairs Battalion intended to use the VWR and OWS.

6.2 INVENTORY OF CHEMICALS/HAZARDOUS SUBSTANCES

Hazardous substances were stored next to one of maintenance bay overhead doors in the OMS during the Site reconnaissance. These materials included POLs used for maintenance of military vehicles, as shown in Photographs 23 and 28 in Appendix B. Cleaning chemicals were also observed in the Administration Building janitor's closet.

The only chemicals observed in the OMS during the Site reconnaissance are shown in Photographs 23 and 28 in Appendix B, and consisted of new oils for the vehicles. The cleaning chemicals that were observed in the janitorial closet were maintained in good condition during the Site reconnaissance.

The former USAR tenants, the 493rd Engineer Group and A Company, 980th Engineer Battalion, stored hazardous substances in a hazmat building in the MEP lot before vacating the USAR Center in 2005. The hazmat building was removed from the Site when the former USAR tenants vacated the Site in 2005. During the Site reconnaissance, no stains were observed in the MEP area where the hazmat building was formerly located.

6.3 WASTE DISPOSAL SITES

No stained soil or stressed vegetation was observed at the Site during the Site reconnaissance. The MEP and POV parking lots did not show any signs of staining, and no noxious or foul odors were noted. An approximate 10-cubic-yard pile of dirt was observed in the northwest corner of the MEP lot, as shown in Photograph 8 in Appendix B. The origin and contents of the dirt pile were unknown to all USAR personnel interviewed.

6.4 PITS, SUMPS, DRY WELLS, AND CATCH BASINS

There are no pits, sumps, or dry wells at the Site. As discussed in Sections 3.5.8 and 6.1, the MEP lot has a VWR with a catch basin connected to an OWS, as shown in Photographs 13 and 14 in Appendix B. The floor drains in the restrooms, kitchen, and mechanical rooms discharge to the city of Dallas sanitary sewer. The kitchen drain, shown in Photograph 16 in Appendix B presumably connects to a grease trap.

6.5 ASBESTOS-CONTAINING MATERIAL

As discussed in Section 3.5.5, two asbestos inspections were performed at the Site. The asbestos inspections did not include the hazmat building. The TEJV was provided no information concerning whether any asbestos abatement has occurred since the 1998 re-inspection. As shown in Photograph 20 in Appendix B, at least some of the pipe

insulation in the Administration Building mechanical room was labeled as “asbestos-free” during the Site reconnaissance. However, unlabeled ACM may remain on the Site.

6.6 PCB-CONTAINING EQUIPMENT

As described in Section 3.5.7, three PMTs are on a single power pole (Photograph 31 in Appendix B) located on the west side of the facility along South Lancaster Road. A 1997 PCB assessment identified these transformers as non-PCB-containing units owned by TXU Energy. The transformers were manufactured by General Electric, but their age was unknown (they appeared to be in good condition/no leaks at the time of the 1997 survey). The report also identified that no fluorescent light fixtures at the facility have PCB-containing ballasts.

Two PMTs are on a single pole on the northwest property boundary on South Lancaster Road (Photograph 30 in Appendix B). These transformers provide power to the self-service car wash on the adjacent property to the north, at 4846 South Lancaster. These transformers were not included in the 1997 PCB assessment. The transformer identification numbers are 9405775 and 9512131. The age and PCB content of the transformers is unknown. TXU Energy’s policy is to classify as PCB-contaminated all untested transformers manufactured before January 1, 1980.

The five PMTs appeared in good condition during the Site reconnaissance.

6.7 LEAD AND LEAD-BASED PAINT

As described in Section 3.5.3, LBP was detected at the Site during an earlier Site assessment by the Thompson Professional Group, Inc., and recommendations were made for mitigation measures to reduce the risk of release and exposure to lead through normal activities. The TEJV was not provided any documentation regarding the implementation of these recommendations. Painted surfaces in the buildings were observed to be in good condition during the Site reconnaissance.

As described in Section 3.5.9, the Thompson Professional Group, Inc., collected wipe and air samples from the former IFR to assess its condition. The analytical results indicated the presence of hazardous levels of lead dust on the floor of the firing range near the bullet deflector. Further lead sampling was conducted in December 1995 and, based on these results, the 90th RRC allowed the facility to convert the IFR for alternative use as a storage room only.

As shown in Photograph 29 in Appendix B, a potential lead seal on a wastewater discharge pipe in the southwest corner of the Administration Building was observed to be in a deteriorated condition.

6.8 RADON

As described in Section 3.5.4, the 90th RRC conducted radon surveys in 1994 and 2000 at the Site. In both surveys, the maximum radon detections were below the USEPA-recommended action level of 4.0 pCi/L.

Dallas County is in the USEPA Radon Zone 3, which has a 1.2 pCi/L indoor radon average level. Three sites were tested in the 75216 zip code of the site, and 95 sites tested county-wide. The average result for the 75216 zip code was 0.833 pCi/L, with the maximum less than 4.0 pCi/L. The mean result county-wide was 1.2 pCi/L, with a maximum of 6.8 pCi/L. Based on actual measurements, radon is not an environmental concern at the Site.

6.9 UNEXPLODED ORDNANCE

The Administration Building contains an arms vault. USAR personnel did not have access to the arms vault during the Site reconnaissance, and did not know its contents. No indications were found during the Site reconnaissance or review of records to indicate the presence of munitions and explosives of concern at the Site.

6.10 RADIOLOGICAL MATERIALS

Based on the Site reconnaissance and interviews with USAR personnel, the USAR Center does not use or store any radiological materials.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

The area surrounding the USAR Center is a mix of single and multi-family residential, commercial retail, and parking zoned space. TEJV personnel reviewed zoning information on the city of Dallas Interactive Maps Web site. The USAR Center is zoned MF-2(A). A narrow strip of land, approximately 100 feet wide along both sides of South Lancaster Road and Ledbetter Road (nearest intersection to the south) is zoned commercial retail (CR). The apartment complex that abuts the Site to the south that was destroyed by a tornado and the car wash to the north are also zoned CR. The apartment complex to the north is zoned parking. The residential area that abuts the Site to the east as well as the area outside the narrow commercial retail zone is zoned single-family residential. Figure 20 in Appendix A provides a map of the zoning boundaries identified on the city of Dallas Web site.

7.2 COASTAL ZONE MANAGEMENT

The Texas Coastal Management Plan is administered by the Texas General Land Office. The Texas coastal zone extends southwest along the coast from the Sabine River to the Rio Grande River, seaward into the Gulf of Mexico for a distance of 10.35 miles, and inland to include 36 counties. The coastal zone includes all counties bordering the Gulf of Mexico and extends approximately 40 miles inland. It includes all estuaries and tidally influenced streams and bounding wetlands. The USAR Center is approximately 250 miles inland from the Gulf of Mexico. Dallas County is not included in the Texas Coastal Management Plan.

7.3 WETLANDS

A search for wetland information was conducted online from the USFWS National Wetlands Inventory map data Web site, with no digital data available for the Site. Additionally, EDR did not have wetlands information for the Site. No vegetation typical of wetlands was observed on the Site. Figure 18 in Appendix A is the National Wetlands Inventory map containing the Site.

7.4 100-YEAR FLOODPLAIN

According to the FEMA Flood Insurance Rate Map, Community-Panel 4801710175D, the Site is not included in the 100-year or 500-year floodplain elevations (Figure 19 in Appendix A), as defined by the FEMA Flood Hazard Area information obtained online from the FEMA Web site at http://www.msc.fema.gov and shown in the environmental database report.

7.5 NATURAL RESOURCES

According to information obtained from the USFWS Region 2 Endangered Species List, Dallas County, Texas, the vicinity of the Site includes five threatened and/or endangered birds:

- Bald Eagle *(Halioeetus leucocephalus)*
- Black-Capped Vireo *(Vireao atricappilla)*
- Golden-Cheeked Warbler *(Dendroica chrysoparia)*
- Least Tern *(Sterna antillarum)*
- Piping Plover *(Charadrius melodus)*

Based on the developed nature of the Site, and the lack of sensitive natural resources, except for potential incidental use by migrants, the threatened and endangered species are unlikely to occur at the Site.

7.6 CULTURAL RESOURCES

As described in Section 3.5.6, a cultural resource assessment was performed for the Site. The conclusion was that there were no architectural or archeological issues at the USAR Center. The Site has a "low" archeological potential and is not eligible for the National Register of Historic Places. The current structures on the Site were built in 1957 and were not considered eligible for recommendation to the register because they did not meet the 50-year age criteria.

7.7 OTHER SPECIAL RESOURCES

There are no other known resources that could affect the Site.

8.0 CONCLUSIONS

The TEJV, under contract to the USACE, Louisville District, has prepared this ECP Report for the William Herzog Memorial USAR Center (Facility ID TX025), at 4900 South Lancaster Road in Dallas, Dallas County, Texas. The Site encompasses approximately 5 acres and is currently active; the 490th Civil Affairs Battalion and the Federal Bureau of Prisons occupy the facility. The Site contains an Administration Building and an OMS.

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 been used and stored at the Site 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 evidence that the chemicals used or stored were ever improperly handled, released, or disposed at the Site.

- ***VWR.*** The VWR in the MEP lot has an associated catch basin and OWS, which discharges to the city of Dallas sanitary sewer. An October 2000 evaluation found that the 1,346-gallon OWS had not been cleaned since 1997 and that several inches of sludge were in both chambers of the OWS. Although the OWS was stated to be unused in 2000, and there were no indications that the VWR or OWS had been used since 2000, USAR personnel stated that the wash rack is “cleared for use” and that the USAR plans to use it in the future. There were no signs of POL staining in the VWR and OWS area during the Site reconnaissance.

- ***USTs/ASTs.*** No petroleum ASTs are or have been at the Site. The OWS associated with the VWR is registered with the TCEQ as a PST.

- ***Non-UST/AST Petroleum Storage.*** Petroleum storage would have occurred in designated areas in the OMS and in the former hazmat storage building. No documentation was available for review that would indicate that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on the Site. Petroleum stains and sorbent material were observed on the concrete floor of the OMS during the Site reconnaissance, specifically where a forklift was leaking fluids.

- ***PCBs.*** The Site has three non-PCB-containing PMTs on a single power pole located south of the Administration Building. The transformers are of unknown age and were manufactured by General Electric. At the time of a 1997 PCB survey, they appeared to be in good condition and had no leaks. The 1997 report stated the transformers were non-PCB-containing. Two PMTs were identified on a single pole on the northwest property boundary along South Lancaster Road, which connects to the adjacent property. The PCB-status of those transformers is unknown, and they were not included in the 1997 survey. The five PMTs appeared in good condition during the Site reconnaissance. The 1997 PCB survey indicated that the fluorescent lighting at the facility does not have PCB-containing ballasts.

- ***ACM.*** The Thompson Professional Group, Inc. performed an asbestos assessment of the Site in 1994. An asbestos re-inspection was performed by the 90th RRC Environmental Section in May 1998. The re-inspection noted the presence of asbestos-containing pipe insulation and mudded joints in both the Administration Building and OMS, asbestos-containing floor tile mastic in the Administration Building, and an asbestos-containing vibration collar in the OMS. During the Site reconnaissance, "asbestos free" labels were observed on pipe insulation in the Administration Building mechanical rooms, but no documents pertaining to abatement actions after the 1998 re-inspection were identified.

- ***LBP.*** The results of a LBP assessment of the USAR Center were published in 1994. LBP was found in the Administration Building on exterior red doors and door frames, exterior iron rain downspouts, exterior white support columns, and exterior pink supply room vents. In the OMS, LBP was found on several interior doors and door frames, the overhead doors and frames, exterior brick protectors, exterior cooling unit 36, exterior iron rain downspouts, and exterior metal doors. The LBP found at both the Administration Building and OMS was identified as being weathered to extremely deteriorated. No peeling paint, or otherwise deteriorated conditions, was observed during the Site reconnaissance.

- ***Former IFR.*** Wipe and air samples were collected from the IFR in 1995. The sample results indicated the presence of hazardous levels of lead dust on the floor of the firing range, near the bullet deflector. Two air samples indicated that occupant exposure to lead dust in the air was insignificant. Further sampling was conducted in December 1995. Based on those results, a May 20, 1996, memorandum from the 90th RRC stated that the facility was allowed to convert the IFR for alternate use as a storage room only. The former IFR was not in used during the Site reconnaissance.

- ***Former Photography Laboratory.*** The Administration Building has an inactive dark room. No photographic developing equipment or chemicals were observed during the Site reconnaissance, and USAR personnel were unfamiliar with its former use. It is not known how the photographic developing solutions were disposed, but the rinse water was presumably discharged to the sanitary sewer.

- ***Dirt Pile.*** An approximately 10-cubic-yard dirt pile was observed near the northwest corner of the MEP lot. The origin and contents of the dirt pile were unknown to all USAR personnel interviewed. No noxious or foul odors were noted, and the dirt pile was covered with vegetation.

- ***Radiological Materials*****.** No radiological materials were identified during the Site reconnaissance. There is no evidence of any release of radiological materials at the Site.

- ***Radon*****.** Radon surveys of the USAR Center were conducted in 1994 and 2000. The sample results from the two surveys ranged from 0.6 to 3.8 pCi/L, which are below the USEPA-recommended action level of 4 pCi/L. Dallas County is in USEPA Radon Zone 3, which has an indoor average of less than 1.2 pCi/L for 95 sites. The average result for the 75216 zip code was 0.833 pCi/L. Based on actual measurements; radon is not an environmental concern at the Site.

- ***Munitions and Explosives*****.** The Administration Building contains an arms vault. USAR personnel did not have access to the arms vault during the Site reconnaissance, and did not know the contents of the arms vault. No indications were found during the Site reconnaissance or during the review of records to indicate the presence of munitions and explosives of concern at the Site.

- ***Surrounding Properties.*** Potential environmental sites of concern, located within corresponding ASTM minimum search distances from the Site were evaluated. Based on an evaluation of available information and details concerning the identified sites, no "High Risk" sites were identified near the USAR Center. "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site. However, the Site is in an area with a history of commercial development with operations of potential concern including bulk fuel storage, drycleaning, and automotive body shop/engine repair. These operations are expected to have used and stored bulk quantities of CERCLA hazardous substances and/or petroleum products, although no evidence of releases was identified.

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

- Major Dexter Caston, Operations Manager, 490th Civil Affairs Battalion, 214-371-3109, dexter.caston@us.army.mil.

- Gus Faller, Operations Manager, Federal Bureau of Prisons, afaller@bop.gov.

- Kelley Hartsell, Environmental Point of Contact, 90th Army Reserve Installation Management, 310 Armed Forces Drive, Grand Prairie, Texas 75051, 972-343-4258, E-mail: Kelley.hartsell1@us.army.mil

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AGENCIES CONTACTED

- U.S. Fish and Wildlife Services

Appendix A
Figures

FIGURES

Appendix B
Site Reconnaissance Photographs

Appendix C
Chain-of-Title Report

Appendix D
Previous Environmental Reports

PREVIOUS ENVIRONMENTAL REPORTS

1. Engineering, Compliance & Construction, Inc. *Environmental Baseline Survey,* William Herzog Memorial USARC, Dallas, Texas*.* August 2005.

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Appendix E
Regulatory Database Search Reports