

FINAL

**ENVIRONMENTAL CONDITION OF
PROPERTY REPORT**

**1LT RICHARD H. WALKER
U.S. ARMY RESERVE CENTER WA046
3800 NORTH SULLIVAN ROAD
SPOKANE, WASHINGTON 99216**

Prepared For:

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

MARCH 2007

CERTIFICATION

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

STEPHEN A. RIVERA
Environmental Division ARIM
Chief Environmental Division
70th Regional Readiness Command

DATE

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



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

DATE

EXECUTIVE SUMMARY

Lawhon & Associates, Inc. (Lawhon), in conjunction with Fuller, Mossbarger, Scott and May Engineers, Inc. (FMSM), under contract to the U.S. Army Corps of Engineers (USACE), Louisville District, has prepared this Environmental Condition of Property (ECP) Report for the 1LT Richard H. Walker U.S. Army Reserve Center (Facility ID WA046), hereafter referred to as the "Site" or "USAR Center." The Site is located at 3800 North Sullivan Road, Spokane, Spokane County, Washington, and encompasses approximately 10 acres.

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

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

The USAR Center facility is situated on approximately 10 acres of land, located in a predominantly commercial and industrial area, in the City of Spokane, Washington. The Site consists of three permanent buildings: a 26,173 square-foot administration building, a 5,600 square-foot organizational maintenance shop (OMS) building, a 240 square-foot three-sided cinderblock hazardous material (hazmat) structure. The USAR Center is currently occupied by the 659th Construction Company, the 164th Maintenance Company, and the 3/415TH Brigade Combat Team.

Based on a review of aerial photographs dating back to 1953 and U.S. Geological Survey (USGS) topographic maps dating back to 1951, the Site has served as a USAR Center since 1978 when the administration building was constructed. The OMS building was constructed in 1983, while the three-sided cinderblock hazmat structure was constructed in 1990. The land and buildings are owned by the U.S. Government.

Areas of potential environmental concern were reviewed and Lawhon identified petroleum impacts relating to the USAR use of this property. Records indicate a 25-gallon diesel fuel spill occurred on a paved surface in March 2004. Site personnel and the 70th Regional Readiness Command (RRC) representative knew very little about the spill, but believed that the spill was associated with a mobile fuel truck. Database records do not indicate if a clean up was performed. No reports or other documents were available. According to Site personnel, a consultant was hired to sample, remove, and dispose of soil in the area of the spill, and thought the work was done through the U.S. Army Corps of Engineers.

In accordance with Department of Defense policy defining the classifications (See Deputy Under Secretary of Defense Goodman Memorandum dated 21 October 1996), the Property 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

ACM	Asbestos Containing Material
AIRS	Aerometric Information Retrieval System
AMSA	Area Maintenance Support Activity
AR	Army Regulation
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
C-DOCKET	Criminal Docket System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CERFA	Community Environmental Response Facilitation Act
CESQGs	Conditionally Exempt Small Quantity Generators
CFR	Code of Federal Regulations
CONEX	Container Express
CORRACTS	Corrective Action Report
CSCSL	Confirmed & Suspected Contaminated Sites List
DECAM	Directorate of Environmental Compliance and Management
DOCKET	Enforcement Docket
DOD	Department of Defense
DRMO	Defense Reutilization Marketing Office
E2M	Engineering-Environmental Management, Inc.
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.

FEMA	Federal Emergency Management Agency
FFIS	Federal Facilities Information System
FINDS	Facility Index System/Facility Registry System
FMSM	Fuller, Mossbarger, Scott and May Engineers, Inc.
FURS	Federal Underground Injection Control
HSWA	Hazardous and Solid Waste Amendments
ICR	Independent Cleanup Reports
IFR	Indoor Firing Range
kg	Kilogram
KPFF	KPFF Consulting Engineers
Lawhon	Lawhon & Associates, Inc.
LBP	Lead-Based Paint
LQG	Large Quantity Generator
LUST	Leaking Underground Storage Tank
MEC	Munitions and Explosives of Concern
MEP	Military Equipment Parking
MSDS	Material Safety Data Sheet
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No Further Action
NPL	National Priority List
NFRAP	No Further Action Planned
OMS	Organizational Maintenance Shop
OWS	Oil/Water Separator
PADS	PCB Activity Data System

PCB	Polychlorinated Biphenyls
pCi/L	PicoCuries per Liter of Air
PCS	Permit Compliance System
POL	Petroleum, Oil, and Lubricant
POV	Privately-Owned Vehicle
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RQ	Reportable Quantity
RRC	Regional Readiness Command
SHPO	State Historic Preservation Office
Site	U.S. Army Reserve Center WA046
SOW	Scope of Work
SPCCP	Spill Prevention, Control, and Countermeasure Plan
STATE	State Environmental Laws and Statute
SQG	Small Quantity Generator
TSD	Treatment, Storage, or Disposal
TPH	Total Petroleum Hydrocarbons
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage, and Disposal Facility
ug/sf	Micrograms per square foot
USACE	United States Army Corps of Engineers
USAR	United States Army Reserve
USATHAMA	U.S. Army Toxic and Hazardous Materials Agency

USEPA United States Environmental Protection Agency
USFWS United States Fish and Wildlife Service
USGS United States Geological Survey
UST Underground Storage Tank
VCP Voluntary Cleanup Program
WDOE Washington Department of Ecology

1.0 INTRODUCTION

Lawhon & Associates, Inc., Columbus, Ohio was authorized to prepare an Environmental Condition of Property report for the 1LT Richard H. Walker U.S. Army Reserve Center (WA046). The facility is located at 3800 North Sullivan Road, Spokane, Spokane County, Washington, hereafter referred to as the "Site" or "USAR Center". In support of the ECP Report, a visual reconnaissance of the Site was conducted on September 7, 2006. The purpose of the visit was to visually obtain information indicating the environmental condition of property at 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 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 Base Realignment and Closure (BRAC) property;
- Assist Federal agencies during the property screening process;
- Provide information for prospective buyers;
- Assist prospective new owners in meeting the requirements under EPA's "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 or the reportable quantity, whichever is greater, of the substances specified in 40 CFR 302.4 or one kilogram of acutely hazardous waste as defined in 40 CFR 261.30. A notice is also required if hazardous substances have been disposed of or released on the property in an amount greater than or equal to the reportable quantity. Army Regulation (AR) 200-1 requires that the ECP Report address asbestos, lead-based paint, 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 report covers the 10-acre USAR Center located at 3800 North Sullivan Road, Spokane, Spokane County, Washington 99216. It is bounded by Spokane Business and Industrial Park to the north, a LaQuinta Hotel to the south, Cintas Equipment and Vehicles Storage to the east, and the Spokane Valley Recycling and Treatment Facility to the west. Site maps and aerial photographs are provided in Appendix A. Appendix B provides photographs taken during the September 2006 Site visit. Appendix C provides a historic property search report, a chain of title report, and an environmental lien report. Historical environmental documents and reports are provided in Appendix D, while Appendix E contains the Environmental Data Resources, Inc. (EDR) reports.

This ECP report classifies the property into one of seven DoD Environmental ECP categories as defined by the Deputy Under Secretary of Defense S. Goodman Memorandum, "Clarification of 'Uncontaminated' Environmental Condition of Property at BRAC Installations" (21 October 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 the 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 under way, 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.

2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

2.1 SITE LOCATION

The USAR Center is located in the southwest portion of Spokane County, Washington, within the city limits of Spokane Valley (its mailing and city listing location is Spokane), Washington. The Site is located in a primarily commercial and industrial area. Figure 1 in Appendix A provides a general site location map.

2.2 ASSET INFORMATION

Facility Name and Address: 1LT Richard H. Walker U.S. Army Reserve Center
WA046
3800 North Sullivan Road
Spokane, Washington 99216

Property Owner: The land and buildings are by the United States Government.

Date of Acquisition: September 23, 1942

Current Occupants: 659th Construction Company
164TH Maintenance
3/415th Brigade Combat Team

Zoning: I-3 Industrial

County, State: Spokane County, Washington

USGS Quadrangle(s): Greenacres, Washington

Section/Township/Range: Section 1, Township 25 North, Range 44 East

Latitude/Longitude: 47° 41' 22.6" N; 117° 11' 48.5" W

Legal Description: Being that parcel or tract of land, situated and lying in the Southwest ¼ of Section 1, Township 25 North, Range 44 East of the Willamette Meridian, in the City of Spokane Valley, Spokane County, State of Washington, Parcel No. 45013.9024.

2.3 PHYSICAL DESCRIPTION

The USAR Center is situated on approximately 10 acres of land with three permanent structures: a 26,173 square-foot main administration building built in 1978, a 5,600

square-foot OMS building built in 1983, and a 240 square-foot three-sided hazmat structure built in 1990. The USAR Center underwent a renovation in 2001. Views of the buildings are shown in Photographs 1, 2, and 4 through 9 in Appendix B.

The administration and OMS buildings consist of concrete block walls covered with a brick veneer. Both buildings rest upon concrete foundations. The three-sided hazmat structure consists of cinder block walls with a lockable chain-link fence gate covering the front. A military equipment parking (MEP) area and privately owned vehicle (POV) parking area are also present on the Site. Photographs 3, 4, 5, and 26 in Appendix B provide views of the parking areas. Chain-link security fencing topped with barbed wire encloses the Site. Approximately 30% of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by gravel, lawn, and landscape shrubs and trees. Topographically, the Site is relatively flat and contains little relief. Figure 2 in Appendix A provides a current plan view layout of the Site. Appendix B provides photographs taken during the September 2006 site visit.

The irregularly shaped administration building consists of a two-story structure. Photograph 1 in Appendix B provides a front (north) view of the exterior of the building. Photograph 2 in Appendix B provides a side (west) view of the exterior of the building. Photograph 5 in Appendix B provides a view of the building and the OMS. And Photograph 8 in Appendix B shows a view along the west side of the building. The interior of the administration building consists of office space, classrooms, kitchen area, storage, and a drill hall. A locked arms vault is located within the administration building. Site personnel stated that small quantities of small arms ammunition are stored or located at the Site. Photographs 12, 13, 20, 25, 34 provide interior views of the administration building. Figures 3 and 4 in Appendix A provide a layout of the interior of the administration building.

The OMS building is a one-story, rectangular shaped structure, comprised of three service bays, an oil distribution room (formerly called the petroleum, oil, and lubricant (POL) room), and other miscellaneous material, office, and equipment storage rooms. The northern-most bay is a drive-thru. Three overhead metal, retractable doors are located on the east wall of the building, while an additional one is on the west wall at the drive-thru bay. Slotted rectangular drains are located just inside the building at each of the bay openings. Photographs 4, 6, 7 and 9 in Appendix B show exterior views of the OMS building. Photographs 18, 19, and 21 in Appendix B show the interior of the OMS building. Figure 5 in Appendix A provides layouts of the interior of the OMS building, and the hazmat structure.

New oil and other large quantity new products are stored in two steel sheds north of the OMS. One 400-gallon, double-walled, rectangular, steel used oil aboveground storage tank (AST) along with other hazardous materials are stored in the three-sided cinder block hazmat structure north of the OMS. Photograph 17 in Appendix B shows these structures.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Figure 6 in Appendix A provides a portion of the 1986 Greenacres, Washington, USGS topographic map which includes the Site. As shown, the Site is situated at an elevation of approximately 2,018 feet above mean sea level and is relatively flat. In the vicinity of the Site, the land surface is situated on a plain that very gently slopes south towards the Spokane River. Surface water runoff at the Site is directed towards drywells situated in unpaved portions of the Site and to storm water drains in adjoining roadways. Additional information concerning the drains at the Site is discussed below in Section 3.5.3. Surface water reportedly discharges to the City of Spokane Valley sanitary sewer system.

No surface water features are located in the immediate vicinity of the site. The Spokane River is the closest surface water feature to the Site and is located just over a mile south. The Spokane River flows generally west into the Columbia River and eventually to the Pacific Ocean.

According to the EDR Report which references the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 5301740303C, the Site is not included in either the 100-year flood plain elevation or the 500-year flood plain elevation. The EDR Overview Map in the EDR report in Appendix E provides a map depicting the extent of the nearest 100-year and 500-year flood plain in relation to the Site.

2.4.2 Geology/Hydrogeological Characteristics

According to the Washington State Department of Natural Resources Geology of Washington website (<http://www.dnr.wa.gov/geology/columbia.htm>), the Spokane area is situated in the northern part of the Columbia Basin physiographic region. The Columbia Basin, also known as the Columbia Plateau, is a vast area in eastern Washington, southwestern Idaho, and northern Oregon. The physiographic province is characterized by incised rivers, extensive plateaus, and anticlinal ridges rising to 4,000 feet above sea level. The region is underlain by Miocene Columbia River Basalt Group rocks and interbedded Neogene terrestrial sediments.

According to information in the EDR Report acquired from the Soil Conservation Service's (now the Natural Resource Conservation Service) State Soil Geographic Database for Spokane County, Washington, specific types of soil at the Site consist of the Avonville Series. This soil component does not meet the requirements for hydric soils.

The surface soils are generally fine gravelly-silty loams. These soil types have moderate infiltration rates with layers impeding downward movement of water, and are characterized as soils with coarse textures. In a typical profile, the surface layer is

approximately 16 inches thick and is fine gravelly-silt. The subsoil is approximately 25 inches thick and very gravelly-silt loam.

According to the 70th Regional Readiness Command (RRC), the Site is underlain by permeable glacial outwash deposits in excess of 189 ft thick, primarily coarse sand and gravel to at least 80 ft. A gravel borrow pit across Sullivan Rd, and others nearby support the presence of shallow, coarse and permeable soils. Based on nearby boring data (some <0.25 mi away) depth to groundwater at the site is expected to be about 75 to 80 ft below land surface. No information in the EDR Report regarding direction of groundwater flow is available within a 1 mile radius of the Site. However, based on topography and the location of the Spokane River, groundwater flow most likely is to the south towards the river.

2.5 SITE UTILITIES

Water Service – The City of Spokane Valley provides potable water service to the Site.

Sanitary Sewer System – The City of Spokane Valley provides sanitary sewer service to the Site. The primary source of wastewater that is directed to the city sewer system includes non-process wastewater (bathrooms, sinks, etc.) and vehicle washing runoff.

Gas & Electric – Avista Utilities Company provides electric service to the Site. Site personnel did not know the name of the gas provider.

2.6 WATER SUPPLY WELLS & SEPTIC SYSTEMS

Based upon a review of available historical site and agency records and interviews with site personnel, neither a water supply well nor a septic system is or was located at the Site.

A search of federal and state water well databases identified 54 wells located within a 1 mile radius of the Site. None of the wells are directly adjacent to the Site. The purpose of the wells includes private, irrigation, industrial and observation. No information regarding contamination of the wells is presented in the state and federal databases presented in the EDR report in Appendix E. No public water supply wells are located within 1 mile of the Site.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Land titles for the Site were reviewed back to 1941. Appendix C contains Chain of Title and Environmental Lien reports completed for the Site. The Environmental Lien report did not identify any environmental liens against the USAR Center property. According to historical documentation, the United States of America purchased the property from Inland Empire Paper Company on September 23, 1942. No coverage of historical Sanborn fire insurance maps was available from EDR.

Available business directories including City, cross-reference, and telephone directories were reviewed, if available, at approximately five-year intervals for the years spanning 1964 through 2006. According to a City Directory provided by EDR and dated July 24, 2006, the address of the USAR Center was first listed in the research source (Polk's City Directory) in 1981 as the U.S. Army Reserve Center & School. The Site is also listed in the 1991, 1996, and 2006 Polk's City Directory as U.S. Army Reserve. A copy of the City Directory is included in Appendix E.

3.2 PAST USES AND OPERATIONS

In 1942, the U.S. Government purchased the approximately 10 acres of land from the Inland Empire Paper Company. Construction of the administration building occurred in 1978, while the OMS building and hazmat structure were constructed in 1983 and 1990, respectively. In 2001, the administration building and OMS were renovated.

Prior to the USAR Center, the Site and an adjacent industrial park were previously owned by the U.S. Navy, according to Site personnel. The development or use of the Site by the Navy was unknown by Site personnel, as was the time of property transfer from the Navy to the USAR. The Site has served as a reserve and mobilization center for the U.S. Army Reserve since 1978.

The USAR Center is currently occupied by units of the 659th Engineering Company, units of the 164th Maintenance Company, and the 3/415th Brigade Combat Team. Historically, the Site primarily functioned as an administrative, logistical, and educational facility (for engineering and medical support tasks), with limited maintenance of military vehicles occurring in the OMS building.

Currently and historically, the OMS building has been used to perform limited maintenance activities on military equipment. Activities inside the OMS building are limited to preventative maintenance checks, including checking vehicle fluids such as motor oil, water, and antifreeze, and light maintenance activities. Equipment requiring major overhaul is sent off site.

Historic documents, personnel interviews and historical aerial photographs and topographic maps were the primary sources of information on the past use and

operations at the Site. Figures 6 - 11 in Appendix A provide USGS topographical maps and aerial views of the Site and surrounding areas in 1951, 1953, 1972, 1973, 1982, and 1986.

The 1951 USGS topographical map (Figure 8 in Appendix A) shows what would appear to be buildings or objects and is labeled as Naval Supply Depot. Numerous railroad tracks are noted within the vicinity of the Site.

The 1973 USGS topographical map (Figure 7 in Appendix A) shows no significant changes to the Site, with the exception that it is labeled Spokane Industrial Park.

The 1986 USGS topographical map (Figure 6 in Appendix A) shows no significant changes from the 1953 and 1973 topographic maps.

Due to the scale of aerial photographs (1982, Figure 9 in Appendix A; 1972, Figure 10 in Appendix A; and 1953, Figure 11 in Appendix A) supplied to Lawhon, no specific Site features were discernible.

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

3.3.1 Past Use and Storage of Hazardous Substances

Information related to the past use and storage of hazardous substances at the Site was compiled through review of available site records, search of Federal and State environmental databases, and interviews with Army Reserve personnel.

Chemicals formerly used and stored at the Site were associated with vehicle and facility maintenance activities, and janitorial services. Janitorial chemicals and building maintenance-related products were stored in the designated storage area within the janitorial closets located in the administration building. According to Site personnel, vehicle maintenance products were historically stored within designated POL area in the OMS building, hazmat structure, or the hazmat sheds.

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

3.3.2 Past Disposal and Release of Hazardous Substances

Information related to past disposal and potential release of hazardous substances at the Site was compiled through review of available site records, search of Federal and State environmental databases, and interviews with Army Reserve personnel. There is no evidence that hazardous substances above reportable quantities were disposed or released at the Site.

3.3.3 Non-UST/AST Storage of Petroleum Products

Records (EDR Radius Map Report in Appendix E) indicate that a 25-gallon diesel fuel spill was on a paved surface in March, 2004. Site personnel and the 70th RRC representative knew very little about the spill, but believed that it occurred associated with a mobile fuel truck. Database records do not indicate if a clean up was performed. No reports or other documents were available. According to Site personnel, a consultant was hired to sample, remove, and dispose of soil in the area of the spill, and thought the work was done through the U.S. Army Corps of Engineers. When interviewed during the September 2006 Site visit, Site personnel were unsure when the spill occurred, but thought it was around 2004. Also, they reported that 20 cubic yards of soil were removed. They stated that it was their recollection that was the only spill that has occurred at the Site. Some discrepancy was noted in that Site personnel believed that the spill was closer to 100-gallons of diesel fuel, not the 25-gallons as reported in the state database discussed in the EDR report (Appendix E). Site personnel indicated that the spill location is near the northeast corner of the OMS which is currently part of the MEP area, and can be seen in Photograph 11 in Appendix B.

3.4 PAST PRESENCE OF BULK PETROLEUM STORAGE TANKS

According to Site personnel no underground petroleum storage tanks are present on the Site. Site records, however, show some discrepancy. A document from a 1989 Army Site report (Section 3.5.1) shows that one underground storage tank (UST) was present at that time, and contained waste oil and waste transmission fluid. It stated that the tank had a 250-gallon capacity and was installed in 1984. The report goes on to state that the tank was leak tested in 1987, and that no leaks were detected. In addition, the tank was tentatively planned for replacement by an AST in a concrete curbed waste oil building. It is presumed that the three-sided cinder block hazmat structure, which houses the 400-gallon AST currently in use, is what the report called the concrete curbed waste oil building. There was no indication of any USTs observed during the September 2006 Site visit, nor were any documents available showing removal or decommissioning of a tank. In addition, there is no information regarding the location or former location of any USTs.

3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

A review of site records produced several reports pertaining to the Site. The following subsections provide a brief summary of these reports. Copies of the reports, unless otherwise specified, are provided in Appendix D.

3.5.1 February 1989, U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) Property Report Database Printout

This facility data report identifies eight areas of hazardous materials;

- Supply trailers where maintenance supplies were stored in an old truck trailer,
- Vehicle wash rack and OWS (the report states that the OWS was installed in 1984, and that it had not been emptied at the time of this inspection),
- A 250-gallon UST installed in 1984 containing waste oil and waste transmission fluid (the report states that it was leak tested in 1987 and no leaks were found; it also states that the UST is tentatively planned for replacement by an AST in a concrete curbed waste oil building),
- A parts cleaner with waste solvent in the OMS,
- A battery room in the OMS,
- A brake changing area where a vacuum is used to contain asbestos fibers during brake work (the report states that vacuum bags and spent brake pads are returned to Fort Lewis),
- A POL storage room with antifreeze, ether, and oil, and
- An indoor firing range.

3.5.2 1991 Radon Site Results

Information provided by the 70th RCC shows that a radon survey was performed at the site in 1991. Four locations were sampled. Based on the sampling results, none of the locations sampled exhibited radon levels above the USEPA's residential action level of 4 picoCuries per liter of air (pCi/L). Radon surveys are currently being performed at facilities within the 70th RRC by Shaw Environmental Group. The radon surveys commenced in July 2006 and results are currently not available.

3.5.3 1993 Oil/Water Separators and Storm Drainage System Improvements

KPFF Consulting Engineers (KPFF) prepared this report (dated May 21, 1993) for numerous USAR Center locations throughout Oregon and Washington. The report states that existing stormwater runoff from this site is divided into two distinct drainage areas. The two areas are the main parking area and the vehicle storage/maintenance area. The main parking area drains to dry wells. One dry well is north and the other is east of the parking lot. These dry wells are in depressed grassy areas. The runoff from the vehicle storage/maintenance building flows to a grassy swale and infiltrates the soil.

Improvements proposed for the Site by this report included building grassy area infiltration ponds around the two existing dry wells near the parking lot. The drainage from the OMS area would also be treated using a grassy area infiltration pond. This pond would be in the general location of an existing grassy swale. A dry well would be

installed for overflow of a larger storm. These improvements reflect the current stormwater handling system at the site.

3.5.4 1994 Asbestos Survey Status Table for the 70th RRC Facilities

A table provided by the 70th RRC listing the status of asbestos containing material (ACM) surveys for its facilities shows that an asbestos survey had been performed at the Site with a report dated April 1994. A copy of this survey was not provided for this study. However, Site personnel indicated there was a known asbestos problem in the boiler room, and it was being addressed. No further information could be provided.

3.5.5 2002 Range Cleanup Report

An indoor firing range (IFR) was formerly present in the second floor of the USAR Center Administration Building. In March – May, 2001, a range removal and abatement was performed by IT Corporation and subcontractors. According to the Range Cleanup Report, dated September 2002, range cleaning activities included: cleaning and removing items stored in the area, removing sound deadening board and acoustical tile ceiling, removing the bullet trap and associated lead (no sand), cleaning the range, cleaning and removing the air handling system, and collecting and analyzing clearance samples.

Based on documentation provided in the Range Cleanup Report September 2002, the firing range was cleaned and dust was removed from the former range. After cleaning, nine dust wipe samples were collected on April 20, 2001. All samples were found to have lead levels above the clearance criteria. After re-cleaning, nine additional samples were collected on May 7, 2001. Two of the nine samples collected were found to have lead levels above the clearance criteria of 200 micrograms per square foot. After re-cleaning for a third time, additional wipe samples were collected on May 14, 2001, and May 16, 2001. Based on the results of the May 16, 2001, clearance sampling event, the clearance criteria had been attained. Via a letter dated May 22, 2001, to the USAR Center, the facility was notified that the clearance levels were attained and that the range could be reoccupied. The area now acts as a company and unit storage area.

3.5.6 2003 Stormwater and Assessment Guidance

This Report analyzed regulatory and facility information, and makes recommendations for facilities in the 70th RRC.

The document discusses the following features at the Walker USARC:

- The motor pool includes an OMS, vehicle wash rack, and MEP, which is covered by gravel,
- The OMS includes three work bays, each of which has a trench drain that connects through the wash rack OWS into the local sanitary sewer system,

- The vehicle wash rack is not currently used; it is equipped with partial curbing, but no covering, and is raised above grade and slopes through a drain into an OWS, which connects into the local sanitary sewer system,
- Potentially Polluting Materials are primarily stored inside flammable storage cabinets and at other locations within the shop building, or outside at a double-floored storage shed; used POL is accumulated into a double-walled AST located within a three-sided shed; although it has no curbing, the shed is equipped with a secondary containment pit,
- Diesel fuel tankers are routinely parked at the MEP; the tankers are parked within portable spill containment systems while parked on site; fueling is primarily conducted off site,
- Spent/waste products are disposed of by certified contractors,
- Spill supplies are readily available,
- According to RRC records, no environmental management plans have been prepared for the facility, and
- Stormwater from the facility generally discharges as sheet flow, away from buildings and into local swales and other low lying areas, where stormwater may eventually reach ditches and other stormwater conveyances along B Street and Highway 290.

The report concludes and recommends that the facility should conduct drainage and compliance assessment to verify drainage connections and determine permitting status; improve preventive maintenance, housekeeping, and visual inspection programs by strengthening training and preparing/enforcing Standard Operating Procedures; also improve command emphasis to enforce proper management habits. The assessment goes on to say that after improving on-site management activities, the facility should investigate eligibility for no-exposure exemption, prepare environmental management plans as required, and consider removing the vehicle wash rack.

3.5.7 September 2004, Draft Survey of Drains, Pollution Control Equipment, and Discharge Points

The Draft Survey of Drains, Pollution Control Equipment, and Discharge Points was prepared for 70th RRC by ICI, LLC. The report identified one exterior surface drain, three dry wells, and an OWS at the Site. In addition, eight interior floor drains are identified: three in the kitchen area, one in the mechanical room of the administration building, and four in the OMS. A grease trap is also located in the dishwashing area of the kitchen.

According to Site personnel, the one exterior drain was recently removed. It formerly was located adjacent to a concrete vehicle wash pad, and connected to the OWS. The interior drains in the OMS are slotted trench drains just inside each of the bays. The slotted floor drains discharge into the OWS. The administration building interior drains are tied into the city's sanitary sewer system. The report states that the grease trap also discharges to the sanitary sewer system. The three drywells are not connected to any other structures and have gravel bottoms and slotted sides for infiltration of storm water runoff.

3.5.8 March 2005, Final Polychlorinated Biphenyl (PCB)-Containing Equipment Inventory Summary Report, Spokane Area and Pasco Area Facilities

Engineering-Environmental Management, Inc. (E2M) prepared this report for the 70th RRC in order to comply with the Toxic Substances Control Act (TSCA) and AR 200-1. This report provides an inventory of equipment at the Site that contains PCBs. According to this report, electrical power is provided from a concrete pad mounted transformer located at the southeast corner of the administration building inside the fence line. The transformer is operated and maintained by the Avista Utilities Company. The transformer has a label certifying that the transformer contains less than 50 ppm PCBs in its cooling fluid.

According to the above mentioned report, the administration building and OMS were completely renovated in 2001. PCB-containing ballasts were removed during this 2001 renovation. A fluorescent light fixture in the boiler room was inspected because it was not apparent if this room was included in the 2001 renovation. The ballast was not labeled "No PCBs" but the general appearance and equipment condition would indicate that the ballast is unlikely to contain PCBs. The report concluded and recommended that due to the fact that this ballast was not labeled "No PCBs", the ballasts in the boiler room light fixtures should be replaced and removed ballasts disposed as if they contained PCBs.

3.5.9 2005 Environmental Compliance Assessment Report

The U.S. Army Reserve performed an internal survey in 2005, listing and evaluating areas on the Site where environmental concerns were apparent. Various areas were noted in the report as needing correction at the time of the assessment. None of the deficiencies observed appeared to pose an immediate risk to human health or the environmental condition at the Site. The comments generally addressed records and housekeeping issues.

3.5.10 2006 Spill Prevention, Control, and Countermeasure Plan (SPCCP)

The SPCCP for Walker USARC was prepared by Shaw Environmental, Inc., dated January 19, 2006. This document contains general facility information in the event of a spill during daily routine operations and provides pollution prevention awareness for

facility staff. Pertinent information contained in this document as it relates to preparation of this ECP report is related to the documented use and storage practices of hazardous materials. Hazardous materials stored at the Site include typical vehicle maintenance related materials similar to those observed during the September 2006 Site visit. Storage and disposal practices outlined in the plan are generally similar to those currently instituted at the Site.

4.0 ADJACENT PROPERTIES

Figure 9 in Appendix A provides a 1982 aerial view of the Site and adjacent properties. At the time of the September 2006 site visit, an industrial facility was under construction north of the USAR Center. A LaQuinta Hotel is located to the south of the Site, while a Cintas Equipment & Vehicle storage facility is located to the east, and a City of Spokane Valley Recycling/Treatment Facility is located to the west. Table 1 provides a list of adjacent properties with their directional location from the Site and zoning. Photographs 26 through 32 in Appendix B provide views of adjacent properties and surrounding land use.

TABLE 1 LIST OF ADJACENT PROPERTIES			
Direction From Site	Name/Type of Property	Address	Zoning
North	Unknown Building Under Construction/ Previously vacant	Unknown	I-3 Industrial
East and Southeast	Spokane Business & Industrial Park	3808 N. Sullivan #N15-202 Spokane Valley, WA	I-3 Industrial
South	LaQuinta Hotel	3808 N. Sullivan #N1 Spokane Valley, WA	I-3 Industrial
East	Cintas Corporation – Equipment & Vehicle Storage	3808 N. Sullivan #N1 Spokane Valley, WA	I-3 Industrial
West	City of Spokane Valley Recycling & Treatment Facility	Kaiser Works, City of Spokane Valley	I-3 Industrial

Appendix A and Appendix E provide historical aerial photographs, topographic maps, and EDR Reports, which were used to evaluate any potential environmental impacts on adjacent properties that may have also impacted the environmental condition at the Site. Land use at all adjacent properties does not appear to have changed significantly over the years and does not appear to have impacted the environmental conditions of the USAR Center.

5.0 REVIEW OF REGULATORY INFORMATION

A component of the ECP is the review of all reasonably obtainable federal, state, and local government records for the Site and surrounding properties, where there has been a release or likely release of any hazardous substance or any petroleum product, and which is likely to cause or contribute to a release or threatened release of any hazardous substance or any petroleum product on the federal real property. A regulatory database summary was acquired from EDR on July 14, 2006. The regulatory database summary consolidates standard federal, state, local, and tribal environmental record sources based on ASTM D 6008-96 (2005) recommended minimum search distances from the Site. A copy of the complete EDR report is included in Appendix E. "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

5.1 FEDERAL ENVIRONMENTAL RECORDS

The regulatory information presented in Table 2 below was obtained from the EDR Federal regulatory database search report.

Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
Delisted NPL	1.000		0	1	0	0	NR	1
NPL Recovery	TP		NR	NR	NR	NR	NR	0
CERCLIS	0.500		0	1	0	NR	NR	1
CERC-NFRAP	0.500		4	0	2	NR	NR	6
CORRACTS	1.000		1	0	2	0	NR	3
RCRA TSDF	0.500		0	0	1	NR	NR	1
RCRA LQG	0.250		2	1	NR	NR	NR	3
RCRA SQG	0.250	X	38	1	NR	NR	NR	40

**TABLE 2
 FEDERAL DATABASE SEARCH**

Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total
ERNS	TP		NR	NR	NR	NR	NR	0
HMIRS	TP		NR	NR	NR	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
DOD	1.000		0	0	0	0	NR	0
FUDS	1.000		0	0	0	0	NR	0
US Brownfields	0.500		0	0	0	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
ROD	1.000		0	1	0	0	NR	1
UMTRA	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0
ICIS	TP		NR	NR	NR	NR	NR	0
PADS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
MINES	0.250		0	0	NR	NR	NR	0
FINDS	TP	X	NR	NR	NR	NR	NR	1

TABLE 2 FEDERAL DATABASE SEARCH								
Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total
RAATS	TP		NR	NR	NR	NR	NR	0

Acronyms – are defined in detail in the attached EDR Report, Appendix E
 TP=Target Property (the Site) NR=Not Requested at this Search Distance

5.1.1 Delisted National Priorities List Deletions (NPL)

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) established the criteria that the USEPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425(e), sites may be deleted from the NPL where no further response is appropriate.

A review of the Delisted NPL list has identified one Delisted NPL site within the ASTM search radius.

- Old Inland Pit, N. Sullivan Rd & Kiernan (1/8-1/4 mi. W)

This site is topographically lower, is cross gradient, and sufficiently distant from the USAR Center to pose any significant concerns.

5.1.2 Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)

The CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act. CERCLIS contains sites which are either proposed to or on the National Priorities List and sites which are in the screening and assessment phase for possible inclusion on the NPL.

According to the EDR report, there is one CERCLIS site within the ASTM search radius:

- Old Inland Pit, N. Sullivan & Kiernan (1/8-1/4 mi. W)

This site is topographically lower, is cross gradient, and sufficiently distant from the USAR Center to pose any significant concerns.

5.1.3 Comprehensive Environmental Response, Compensation, and Liability Information System No Further Remedial Action Planned (CERCLIS-NFRAP)

The Database includes archived sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of USEPA's knowledge, assessment at the site has been completed and that USEPA has determined 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. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

According to the EDR report, there are six CERCLIS-NFRAP sites within the ASTM search radius:

Equal/Higher Elevation

- Spokane Industrial Park, Crown West, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Key Tronic Corporation, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Alumax Irrigation Products, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Steel Foundry, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

These four sites are in the Spokane Industrial Park. Although they are listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient (Section 2.4.2), and therefore should not pose a significant risk to the USAR Center.

Lower Elevation

- Honeywell Electronic Materials, 15128 E. Euclid Ave. (1/4-1/2 mi. SW)
- Kaiser Aluminum & Chemical Corp., 15000 E. Euclid Ave. (1/4-1/2 mi. WSW)

These two sites are topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.1.4 Corrective Action Report (CORRACTS)

CORRACTS identified hazardous waste handlers with RCRA correction action activity. The EDR report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

According to the EDR report, there are 3 CORRACTS sites within the ASTM search radius:

Equal/Higher Elevation

- Key Tronic Corporation, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

This site is in the Spokane Industrial Park. Although it is listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

Lower Elevation

- Honeywell Electronic Materials, 15128 E. Euclid Ave. (1/4-1/2 mi. SW)
- Kaiser Aluminum & Chemical Corp., 15000 E. Euclid Ave. (1/4-1/2 mi. WSW)

These two sites are topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.1.5 Resource Conservation and Recovery Act (RCRA) Information – Treat, Store and Dispose (RCRA-TSDF)

RCRAInfo is USEPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on generators, transporters, and treatment, storage, and/or disposal facilities (TSDF) of hazardous waste as defined by RCRA.

According to the EDR report, there is 1 RCRA-TSDF site within the ASTM search radius:

- Kaiser Aluminum & Chemical Corp., 15000 E. Euclid Ave. (1/4-1/2 mi. mi. WSW)
– Facility had 18 violations listed, has achieved compliance in all by 6/2003.

This site is topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.1.6 Resource Conservation and Recovery Act Information - Large Quantity Generator (RCRA-LQG)

LQGs generate over 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month.

According to the EDR report, there are 3 RCRA-LQG sites within the ASTM search radius:

- Columbia Lighting Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 11 violations listed, has achieved compliance in all by 12/2001.
- Huntwood Industries, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 25 violations listed, has achieved compliance in 20 of the violations by 1/2006. According to the EDR Report, 5 General requirement violations remain.
- General Electric Co., 3919 N. Sullivan Rd. (1/8-1/4 mi. N) – Facility had 6 violations listed, has achieved compliance in all by 9/1993.

Columbia Lighting and Huntwood Industries are in the Spokane Industrial Park. Although they are listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

General Electric is not located at the point that it is marked on the EDR map, and could not be found in the vicinity of the Site, therefore it should pose no significant risk to the USAR Center.

5.1.7 Resource Conservation and Recovery Act Information - Small Quantity Generator (RCRA-SQG)

SQGs generate between 100 kg and 1,000 kg of hazardous waste per month.

The USAR Center is listed as being a RCRA small quantity generator.

In addition to the USAR Center, there are 38 RCRA-SQG sites within the ASTM search radius:

Higher Elevation

- Quintex Corp., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- SNE Enterprises, Inc., 3803 N Sullivan Rd. (0-1/8 mi. E/SE)
- Precision Machine & Supply, Inc., 3807 N. Sullivan Rd., (0-1/8 mi. E/SE)
- American Sign Ind. Corp. Empco, 3808 N. Sullivan Rd., 0-1/8 mi. E/SE) – Facility had 2 violations listed, has achieved compliance in all by 1/1984.
- Inland Empire Distribution Systems, Inc., 3808 N. Sullivan Rd., (0-1/8 mi. E/SE)
- Spokane Galvanizing, 3808 N. Sullivan Rd., (0-1/8 mi. E/SE)

- Venco Products, Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Sterling International, Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Ind. Park Crown West, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Hoxie Painting Co., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Emerald Petroleum Services Bld., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 2 violations listed, has achieved compliance in all by 9/2001.
- Safety Kleen Systems, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Dynea USA Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Clakins Mfg. Co., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 8 violations listed, has achieved compliance in all by 3/1996.
- Service Parts Corp., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Syndetek Corp., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Unin Sash Door Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Melcher Manufacturing, DBA Holiday Pools, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Fiberglass Technology Industries, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 42 violations listed, has achieved compliance in all by 3/2005.
- Plum Creek Remanufacturing, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Packaging, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- CXT Incorporated Precast Plant, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Key Tronic Corporation, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 27 violations listed, has achieved compliance in all by 9/2000.
- Alumax Irrigation Products, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Apex Industries Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Multifab Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

- Alloy Trailers Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 11 violations listed, has achieved compliance in all by 6/1991.
- Tri State Metal Fabricating, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Steel Foundry, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Division 9 Finishes Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 1 violation listed, has achieved compliance in all by 5/2004.
- Hydramotive Products Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Venco Products Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Global Equipment Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Forrest Paint Co., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Metal Products Bldg. 4, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Apollo Plastics Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE) – Facility had 2 violations listed, has achieved compliance in all by 6/1987.
- Midwest Pacific Resources, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

All 37 of these sites are in the Spokane Industrial Park. Although they are listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

Lower Elevation

- NA Degerstrom Inc., 3303 N. Sullivan Rd (1/8-1/4 mi. S) – Facility had 6 violations listed, has achieved compliance in all by 2/2004.

This site is topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.1.8 Record of Decision (ROD)

ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

According to the EDR report, there is 1 ROD site within the ASTM search radius:

- Old Inland Pit, N. Sullivan & Kiernan, (1/8-1/4 mi. W)

This site is topographically lower, is cross gradient, and sufficiently distant from the USAR Center to pose any significant concerns.

5.1.9 Facility Index System/Facility Registry System (FINDS) Site

The FINDS List contains both facility information and “pointers” to other sources that contain more detail. The EDR report includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System); DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control); C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes); FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statute), and PADS (PCB Activity Data System).

According to the EDR report, the USAR Center is in the FINDS list. There is no specific additional information provided in the EDR report.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented below was obtained from the EDR State and Local regulatory database search report. Sites identified by this database search are discussed in the following subsections.

Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total
CSCSL	1.000		1	0	1	0	NR	2
HSL	1.000		0	0	0	0	NR	0
CSCSL NFA	0.500		18	1	0	NR	NR	19
State Landfill	0.500		0	0	0	NR	NR	0
SWTIRE	0.500		0	0	0	NR	NR	0
LUST	0.500		0	1	1	NR	NR	2

**TABLE 3
 STATE DATABASE SEARCH**

Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total
UST	0.250		4	3	NR	NR	NR	7
AST	0.250		0	0	NR	NR	NR	0
MANIFEST	0.250		11	1	NR	NR	NR	12
SPILLS	TP	X	NR	NR	NR	NR	NR	1
INST CONTROL	0.500		0	0	0	NR	NR	0
VCP	0.500		1	1	0	NR	NR	2
ICR	0.500		9	2	1	NR	NR	12
DRYCLEANERS	0.250		0	0	NR	NR	NR	0
CDL	TP		NR	NR	NR	NR	NR	0
WA Emissions	TP		NR	NR	NR	NR	NR	0
INACTIVE DRYCLEANERS	0.250		0	0	NR	NR	NR	0

Acronyms – are defined in detail in the attached EDR Report, Appendix E
 NR=Not Requested at this Search Distance

5.2.1 Confirmed & Suspected Contaminated Sites List (CSCSL)

This database lists properties that are confirmed and/or are suspected of contamination. These sites may or may not already be listed on the federal CERCLIS list.

According to the EDR report, there are 2 CSCSL sites within the ASTM search radius:

Equal/Higher Elevation

- Columbia Lighting Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

Columbia Lighting is in the Spokane Industrial Park. Although it is listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

Lower Elevation

- Kaiser Aluminum & Chemical Corp, 15000 E. Euclid Ave. (1/4-1/2 mi. WSW)

This site is topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.2.2 Confirmed & Suspected Contaminated Sites List (CSCSL) No Further Action (NFA)

This database includes information about sites previously on the Confirmed and Suspected Contaminated Sites list that have received a No Further Action (NFA) determination. Because it is necessary to maintain historical records of sites that have been investigated and cleaned up, sites are not deleted from the database when cleanup activities are completed. Instead a NFA code is entered based upon the type of NFA determination the site received.

According to the EDR report, there are 19 CSCSL NFA sites within the ASTM search radius:

Equal/Higher Elevation

- Spokane Industrial Park N, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park J, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park P, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park O, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park Q, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park L, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park I, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park K, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park M, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park G, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park H, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park F, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park C, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

- Spokane Industrial Park A, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park B, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park D, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park E, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Midwest Pacific Resources, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- General Electric Co. Spokane, 3919 N. Sullivan Rd. (1/8-1/4 mi. N)

Eighteen of these sites are in the Spokane Industrial Park. Although they are listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

General Electric is not located at the point that it is marked on the EDR map, and could not be found in the vicinity of the Site therefore it should pose no significant risk to the USAR Center.

5.2.3 Leaking Underground Storage Tank List (LUST)

Leaking Underground Storage Tank (LUST) Incident Reports records contain an inventory of reported leaking underground storage tank incidents. The data contained in the EDR report came from the Washington Department of Ecology's (WDOE) Leaking Underground Storage Tank Site List.

According to the EDR report, there are 2 LUST sites within the ASTM search radius:

- N.A. Degerstrom, Inc., 3303 N. Sullivan Rd. (1/8-1/4 mi. S)
- Kaiser Aluminum & Chemical, Inc., 15000 E. Euclid Ave. (1/4-1/2 mi. WSW)

These two sites are topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.2.4 Registered Underground Storage Tanks (UST)

USTs are regulated under Subtitle I of the RCRA and must be registered with the State department responsible for administering the UST program. The data contained in the EDR report came from the Department of Ecology's Underground Storage Tanks Site/Tank Report. Inclusion on this list is not indicative of a release.

According to the EDR report, there are 7 UST sites within the ASTM search radius:

Equal/Higher Elevation

- Sullivan Station, 3620 N. Sullivan Rd. (0-1/8 mi. N)
- The Coeur d'Alenes Co., Bldg. No. 7, Spokane Industrial Park (0-1/8 mi. NNE)
- Columbia Lighting, Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- SNE Corporation, Spokane Industrial Park (0-1/8 mi. NNE)
- General Electric Co., 3919 N. Sullivan Rd. (1/8-1/4 mi. N)
- Lippincott Industries, Inc., Bldg. S-3 Spokane Industrial Park (1/8-1/4 mi. E/SE)

Sullivan Station is topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

The Coeur d'Alenes Co. has had three USTs removed and no issues are identified. Therefore it should pose no significant risk to the USAR Center.

Columbia Lighting has had one tank close in place. It is in the Spokane Industrial Park. Although it is listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

SNE Corporation has had one UST removed and is in the Industrial Park located east and south of the Site. It should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

General Electric is not located at the point that it is marked on the EDR map, and could not be found in the vicinity of the Site therefore it should pose no significant risk to the USAR Center.

Lippincott Industries, Inc. has had two USTs removed and no issues are identified. Therefore it should pose no significant risk to the USAR Center.

Lower Elevation

- N.A. Degerstrom, Inc., 3303 N. Sullivan Rd. (1/8-1/4 mi. S)

This site is topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.2.5 MANIFEST Listing

This database is maintained by the WDOE and is a collection of facilities that have reported Hazardous Waste Manifest Data information. Inclusion on this list is not indicative of a release.

According to the EDR report, there are 12 MANIFEST sites within the ASTM search radius:

Equal/Higher Elevation

- Spokane Industrial Park Crown West, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Safety Kleen Systems, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Emerald Petroleum Services Tra., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Fiberglass Technology Industries, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- CXT Incorporated Precast Plant, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Key Tronic Corporation, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Apex Industries Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Multifab Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- 3M Company, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Columbia Lighting Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Huntwood Industries, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

These sites are all in the Spokane Industrial Park, and although they are listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

Lower Elevation

- N.A. Degerstrom Inc., 3303 N. Sullivan Rd. (1/8-1/4 mi. S)

This site is topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.2.6 Spills

This database is maintained by the WDOE and is a listing of spills reported to the Spill Prevention, Preparedness and Response Division.

The USAR Center is listed on the Spills database as having a 25-gallon diesel fuel spill on a paved area reported in March 2004. No other information is presented in the database.

5.2.7 Voluntary Cleanup Program Sites (VCP)

This database is maintained by the WDOE and is a listing of Sites that have entered either the Voluntary Cleanup Program or its predecessor Independent Remedial Action Program.

According to the EDR report, there are 2 VCP sites within the ASTM search radius:

- Midwest Pacific Resources, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- General Electric Co., 3919 N. Sullivan Rd. (1/8-1/4 mi. N)

Midwest Pacific Resources is in the Spokane Industrial Park. Although it is listed as being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

General Electric is not located at the point that it is marked on the EDR map, and could not be found in the vicinity of the Site therefore it should pose no significant risk to the USAR Center.

5.2.8 Independent Cleanup Reports (ICR)

These are remedial action reports the WDOE has received from either the owner or operator of the sites. These actions have been conducted without department oversight or approval and are not under an order or decree. This database is no longer updated by the WDOE.

According to the EDR report, there are 12 ICR sites within the ASTM search radius:

Equal/Higher Elevation

- Inland Empire Dist. Systems Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Navy Gravel Pit, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- USI Columbia Lighting Inc., 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

- A.P. Green Industries Dry Well, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Spokane Industrial Park, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Railroad Motive Power Services, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Kilkom Equipment Dry Well, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)
- Dana Electronics Dry Well, 3808 N. Sullivan Rd. (0-1/8 mi. E/SE)

These sites are all in the Spokane Industrial Park. Although they are listed for its association with being at equal or higher elevation, the Industrial Park is located east and south of the Site and should be down or cross gradient, and therefore should not pose a significant risk to the USAR Center.

- General Electric Co., 3919 N. Sullivan Rd. (1/8-1/4 mi. N)

General Electric is not located at the point that it is marked on the EDR map, and could not be found in the vicinity of the Site therefore it should pose no significant risk to the USAR Center.

- Kaiser – Trentwood Works, Trent Ave./Sullivan (1/4-1/2 mi. N)

This site is listed associated with petroleum product tanks. It is located ½ mile north of the USAR Center and is separated from the Site by an Interstate overpass and railroad tracks. Because of the distance, and according to the listing, cleanup has been addressed; it should pose no significant risk to the USAR Center.

Lower Elevation

- N.A. Degerstrom, Inc., 3303 N. Sullivan Rd. (1/8-1/4 mi. S)

This site is topographically lower and down gradient from the Site, and therefore should not pose a significant risk to the USAR Center.

5.3 TRIBAL ENVIRONMENTAL RECORDS

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

TABLE 4 TRIBAL DATABASE SEARCH								
Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total
Indian Reservation	1.000		0	0	0	0	NR	0
Indian LUST	0.500		0	0	0	NR	NR	0
Indian UST	0.250		0	0	NR	NR	NR	0

Acronyms – are defined in detail in the attached EDR Report, Appendix E

NR=Not Requested at this Search Distance

According to the EDR report, no sites were located within the designated radius for each of the searched Tribal Databases.

5.4 EDR PROPRIETARY RECORDS

The regulatory information presented below was obtained from EDR's Proprietary Records database search report.

TABLE 5 EDR PROPRIETARY DATABASE SEARCH								
Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total
Manufactured Gas Plants	1.000		0	0	0	0	NR	0
EDR Historical Auto Stations	TP		NR	NR	NR	NR	NR	0
EDR Historical Cleaners	TP		NR	NR	NR	NR	NR	0

Acronyms – are defined in detail in the attached EDR Report, Appendix E

TP=Target Property (the Site) NR=Not Requested at this Search Distance

According to the EDR report, no sites were located within the designated radius for each of the searched EDR Proprietary Databases.

5.5 ENVIRONMENTAL REGULATORY AGENCY INQUIRIES

Information regarding the Site was requested from the following local government agencies. A summary of information obtained from the agencies contacted is presented below. Correspondence and information obtained from agencies is provided in Appendix D.

The following divisions of the Washington Department of Ecology (WDOE) were contacted to request environmental records available for the Site:

- Air Quality Program – An environmental records review was requested August 10, 2006 from the Division of Air Quality. They have no files for the Site.
- Division of Water Quality – An environmental records review was requested August 10, 2006 from the Division of Air Quality. They have no files for the Site.
- Division of Waste Management - An environmental records review was requested August 10, 2006 from the Division of Waste Management. A reply via email was received on August 15, 2006 from Ms. Sally Perkins from the Washington Department of Ecology stating they had Hazardous Waste Compliance files only.

5.6 UNMAPPED SITES

Five unmapped properties were included in the EDR report. Unmapped sites are those with insufficient address information such that they can only be identified as within the zip code of the target property. Based on our reconnaissance of the site vicinity, the unmapped properties were not within the applicable search radii or are duplicate listings and are discussed in the appropriate subsections of Section 5.

5.7 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO THE SITE

To summarize Subsections 5.1 through 5.6, 75 separate properties, in addition to the USAR Center, were evaluated as potential risk properties to the Site. The properties evaluated were identified as a result of information obtained during area reconnaissance and regulatory database searches and are listed below in Table 6.

Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
3M Company	MANIFEST	Equal/Higher	Low	Cross or Down Gradient
A.P. Green Industries Dry Well	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient
Alloy Trailers Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Alumax Irrigation Products	CERCLIS-NFRAP RCRA-SQG	Equal/Higher	Moderate	No Violations, Cross or Down Gradient
American Sign Ind. Corp. Empco	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Apex Industries	RCRA-SQG, MANIFEST	Equal/Higher	Low	No Violations, Cross or Down Gradient
Apollo Plastics Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Clakins Mfg. Co.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Columbia Lighting Inc.	RCRA-LQG, CSCSL, UST, MANIFEST	Equal/Higher	Moderate	11 Violations, Remedial Action in Progress, Cross or Down Gradient
CXT Incorporated Precast Plant	RCRA-SQG, MANIFEST	Equal/Higher	Low	No Violations, Cross or Down Gradient
Dana Electronics Dry Well	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient
Division 9 Finishes Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Dynea USA, Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Emerald Petroleum Services Bld.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Emerald Petroleum Services Tra.	RCRA-SQG, MANIFEST	Equal/Higher	Low	No Violations, Cross or Down Gradient
Fiberglass Technology Industries	RCRA-SQG MANIFEST	Equal/Higher	Moderate	Cross or Down Gradient
Forrest Paint Co.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
General Electric	RCRA-LQG, CSCSL NFA, UST, VCP, ICR	Equal/Higher	Low	Site not found
Global Equipment Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Honeywell Electric	CERCLIS-NFRAP, CORRACTS	Lower	Low	11 Violations, not listed on database that has reported a release, Down Gradient
Hoxie Painting Co.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Huntwood Industries	RCRA-LQG, MANIFEST	Equal/Higher	Moderate	Cross or Down Gradient
Hydramotive Products Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Inland Empire Distribution Systems	RCRA-SQG, ICR	Equal/Higher	Moderate	No Violations, Cross or Down Gradient
Kaiser Aluminum & Chemical Corp.	CERCLIS-NFRAP, CORRACTS, RCRA-TSDF, CSCSL, LUST	Lower	Low	18 Violations, Remedial Action in Progress, Down Gradient
Kaiser-Trentwood Works	ICR	Equal/Higher	Moderate	No Issues, Distant from Site
Key Tronic Corporation	CERCLIS-NFRAP, CORRACTS, RCRA-SQG, MANIFEST	Equal/Higher	Moderate	No Further Action, Cross or Down Gradient
Kilkom Equipment Dry Well	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient
Lippincott Industries	UST	Equal/Higher	Low	2 Tanks removed, no issues, Down Gradient
Melcher Manufacturing DBA	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Midwest Pacific Resources	RCRA-SQG, CSCSL-NFA, VPC	Equal/Higher	Moderate	No Violations, No Further Action, Cross or Down Gradient
Multifab Inc.	RCRA-SQG MANIFEST	Equal/Higher	Low	No Violations, Cross or Down Gradient
N.A. Degerstrom	RCRA-SQG, LUST, UST, MANIFEST, ICR	Lower	Low	6 Violations, Remedial Action Completed, Down Gradient
Navy Gravel Pit	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
Old Inland Pit	Delisted NPL, CERCLIS, ROD	Lower	Low	No Issues, Down Gradient
Plum Creek Remanufacturing	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Precision Machine & Supply Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Quintex Corp.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Railroad Motive Power Services	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient
Safety Kleen Systems	RCRA-SQG, MANIFEST	Equal/Higher	Low	No Violations, Cross or Down Gradient
Service Parts Corp.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
SNE Enterprises, Inc.	RCRA-SGQ	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Galvanizing	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Ind. Park Crown West	RCRA-SQG, MANIFEST	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient
Spokane Industrial Park	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient
Spokane Industrial Park A	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park B	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park C	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park Crown West	CERCLIS-NFRAP	Equal/Higher	Moderate	No Violations, Cross or Down Gradient
Spokane Industrial Park D	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park E	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park F	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park G	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park H	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park I	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
Spokane Industrial Park J	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park K	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park L	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park M	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park N	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park O	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park P	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Industrial Park Q	CSCSL-NFA	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Metal Products Bldg. 4	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Packaging	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Spokane Steel Foundry	CERCLIS-NFRAP, RCRA-SQG	Equal/Higher	Moderate	No Violations, Cross or Down Gradient
Sterling International	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Sullivan Station	UST	Lower	Low	Not on a database that has reported a release
Syndetek Corp.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
The Coeur d'alenes Co. Bldg. 7 Spokane Industrial Park	UST	Equal/Higher	Low	3 Tanks removed, no issues
Tri State Metal Fabricating	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
Unin Sash Door Inc.	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient
USI Columbia Lighting Inc.	ICR	Equal/Higher	Moderate	No Issues, Cross or Down Gradient
Venco Products	RCRA-SQG	Equal/Higher	Low	No Violations, Cross or Down Gradient

Acronyms – are defined in detail in the attached EDR Report, Appendix E

Based on an evaluation of available site information and details concerning the properties listed in Table 6, none of the facilities evaluated are classified as “High Risk”.

“High Risk” properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

Findings documented in the following subsections are based on the September 7, 2006, Site visit and area reconnaissance, a review of available site records, and information obtained from U.S. Army Reserve personnel.

6.1 ABOVEGROUND STORAGE TANKS

One 400-gallon, double-walled, rectangular, steel used oil AST is located in the three-sided hazmat storage structure. This structure is cinderblock on three sides with a lockable chain-link gate in the front. No stains or evidence of spills were observed around the AST.

6.2 ASBESTOS CONTAINING MATERIAL

A table provided by the 70th RRC listing the status of ACM surveys for its facilities, shows that an asbestos survey has been performed at the Site with a report dated April 1994. A copy of this survey was not provided for this study. However, Site personnel indicated there was a known asbestos problem in the boiler room, and it was being addressed. It is unknown if the problem involves friable or non friable asbestos. Views of the boiler room are shown in Photographs 12 and 13 in Appendix B. During the September 2006 Site visit, at least one pipe near the ceiling of the boiler room had a slow leak which was causing deterioration of insulation.

6.3 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS

Visual inspections for hazardous substances and petroleum products were conducted during the September 2006 Site visit. The USAR Center is listed under USEPA's RCRIS as a RCRA-SQG.

Based on information supplied by the 70th RRC, the Site is listed as an RCRA-SQG due to the generation of waste from vehicle maintenance activities in the OMS area. Typical wastes noted during the Site reconnaissance included: used oily rags, used oil, paint cans, used antifreeze, diesel fuel, and other vehicle maintenance waste. Chemicals stored at the OMS included: diesel fuel, motor oil, brake fluid, gear oil, lubrication oil, multi-purpose grease, aerosol spray cans, as well as other typical vehicle maintenance fluids.

Hazardous materials stored at the Site were observed in two metal hazmat sheds (on spill pallets), in the used battery storage area and, in the three-sided hazmat storage structure. Flammable hazardous material was observed in flammable cabinets in the OMS building, and in the administration building. 55-gallon drums of various weight oils currently in use were located in an oil distribution room (formerly referred to as the POL storage room), located at the southwest corner of the OMS building (Photographs 14-18, 21-23 in Appendix B).

During the September 2006 Site visit, one of the metal hazmat sheds contained primarily new 55-gallon drums of oil. The other hazmat shed primarily housed grease, antifreeze, hydraulic fluid, and propane (Photograph 36 in Appendix B). The three-sided hazmat structure is used to keep a variety of hazardous waste products (Photograph 17 in Appendix B). The primary wastes are oil, antifreeze, and diesel fuel. The flammable cabinet in the OMS is used primarily for aerosol cans of spray paint (Photograph 18 in Appendix B). The flammable cabinets in the administration building are primarily used to keep paint (Photographs 22 and 23 in Appendix B). One solvent sink in the OMS, observed during the Site visit, is serviced by Safety-Kleen on a monthly basis according to Site personnel.

No staining was noted in or around the hazardous material structure, sheds or storage areas inside or outside the OMS or administration building.

In the administration building, cleaning supplies are kept in the janitor supply closet (Photograph 24 in Appendix B), as well as in the kitchen area.

According to Site personnel, hazardous substances are not stored at the Site for one year or more. Waste products are picked up routinely, with batteries removed as frequently as every 2 weeks.

6.4 INDOOR FIRING RANGE

Historically, the Site operated an indoor firing range. In 2001 a range removal and abatement was performed by IT Corporation and subcontractors. According to the Range Cleanup Report, dated September, 2002, range cleaning activities included: cleaning and removing items stored in the area, removing sound deadening board and acoustical tile ceiling, removing the bullet trap and associated lead (no sand), cleaning the range, cleaning and removing the air handling system, and collecting and analyzing clearance samples. A letter dated May 22, 2001, to the Walker USAR Center stated that lead clearance levels (200 micrograms per square foot) were attained and that the range could be reoccupied. The area now acts as a company and unit storage area (Photograph 20 in Appendix B).

6.5 LEAD-BASED PAINT (LBP)

According to information provided by the 70th RRC, there are no documented LBP surveys or abatement projects at the Site. Also, the USAR Center underwent a renovation in 2001. It is unknown whether any or all layers of paint were removed. Based on the date of construction of the administration building (1978), it is likely that LBP exists in the structure. The OMS, however, was constructed in 1983, and due to its more recent date of construction, may not contain LBP. During the September 2006 Site visit, painted surfaces within the administration and OMS buildings appeared to be

in fair to good condition, with the exception of silver paint flaking in the boiler room of the administration building (Photograph 25 in Appendix B).

6.6 MOLD

Mold was observed in the boiler room in an area where leaking pipes were present. There was no additional information available regarding mold at the site.

6.7 MUNITIONS AND EXPLOSIVES OF CONCERN

No indication of munitions and explosives of concern (MEC) were observed or reported by facility personnel during the Site visit in September 2006. A locked arms vault is located in the administration building. The vault is only accessible by authorized personnel. Only small quantities of small arms ammunition are stored in the arms vault. Site personnel indicated that no MEC, including unexploded ordnance, were present on the Site.

6.8 NEARBY PROPERTIES

Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site, were evaluated (Section 5.0). None of the facilities evaluated are classified as "High Risk". "High Risk" properties are those that exhibit environmental conditions that have the probability of adversely affecting the environmental conditions at this Site or another property.

The Site is located at the western edge of a fairly large industrial park (Photograph 28 in Appendix B). Companies in the industrial park range from small businesses, with no manufacturing, to larger businesses, with warehouses for shipping and/or manufacturing activities.

An industrial building (Cintas) is adjacent to the Site on the east (Photographs 26 and 29 in Appendix B). Site personnel reported that no chemicals or manufacturing is performed at the Cintas site.

At the time of the September 2006 Site visit, a new industrial building was being constructed to the north of the Site (Photograph 27 in Appendix B).

The Spokane Valley Recycling/Treatment Center is across a four lane road (N. Sullivan Road) to the west (Photograph 30 in Appendix B). It appeared to serve as a solid waste transfer facility and recyclables drop-off center. Site personnel complained about odors from the facility when the winds are from the west. A construction supply center is located next to the Recycling/Treatment Center, and southwest of the Site (Photograph 32 in Appendix B).

The La Quinta Hotel and small commercial outlets are located south of the Site (Photograph 31 in Appendix B).

6.9 OIL/WATER SEPARATOR

One OWS is situated just north of the OMS building next to the former vehicle wash rack area (Photograph 33 in Appendix B). According to Site personnel, water from the OMS building goes to the OWS. Waste water is then discharged to the City of Spokane Valley sanitary sewer system. The OWS is reportedly inspected and serviced by an outside contractor when needed, which, according to Site personnel, is approximately once every two years. The most recent cleaning was in 2006. No odors or staining were detected in or around the drainage systems during the Site reconnaissance.

6.10 MOBILE PETROLEUM PRODUCT STORAGE

According to Site personnel, mobile diesel fuel trucks are routinely parked in the MEP area. A portable secondary containment is placed around the trucks when they contain fuel. During the September 2006 Site visit, a 5,000-gallon mobile fuel truck was parked in the MEP area, along with 3 construction vehicles. Secondary containment was not in use, because Site personnel stated that the fuel truck's tank was empty.

6.11 PITS, SUMPS, DRYWELLS, AND CATCH BASINS

Three dry wells were observed at the Site during the September 2006 Site visit. In addition, eight interior floor drains were observed: three in the kitchen area and one in the mechanical room of the administration building, and four in the OMS. The interior drains in the OMS are slotted trench drains just inside each of the bays. These slotted floor drains reportedly discharge into the OWS. The administration building interior drains are reportedly tied into the city's sanitary sewer system. A grease trap was also observed located in the dishwashing area of the kitchen.

According to Site personnel, the one exterior drain adjacent to the OWS was recently removed. No information was provided as to why the drain was removed. There was no overt evidence of a recent drain removal. The area of the drain was located on a figure in the 2004 Draft Survey of Drains, Pollution Control Equipment, and Discharge Points (Section 3.5.7). It was observed as gravel at the time of the September 2006 Site visit.

6.12 POLYCHLORINATED BIPHENYL (PCB) EQUIPMENT

Based upon information provided by the 70th RRC, there is no known PCB containing equipment at this facility; however, PCBs may be contained in light ballasts in older type light fixtures. Based on the construction date of the buildings it is possible that some of these ballasts could potentially contain PCBs. However, due to the 2001 renovation of the facility, most if not all ballasts were replaced. Any light ballast not marked with "No PCBs" should be assumed to contain PCBs and management and disposal of these light ballasts must be in accordance with Local, State and Federal requirements.

6.13 PCB TRANSFORMERS

A pad mounted transformer is located at the southeast corner of the administration building. The transformer is owned by Avista Utilities Company. The transformer has a label certifying that the transformer contains less than 50 ppm PCBs. The transformer appeared to be in good condition during the September 2006 Site visit.

6.14 RADIOACTIVE MATERIALS

Facility personnel indicated that to their knowledge the Site never had a Nuclear Regulatory permit. Most military facilities will have some low level radiological materials associated with the illumination of various types of military equipment (e.g., watch dials, compasses, aiming circles, etc). There is no evidence to suggest that any radiological commodities were ever improperly managed at the Site, or that any radionuclides were ever released.

6.15 RADON

Information provided by the 70th RCC shows that a radon survey was performed at the site in 1991. Based on the sampling results, no locations sampled exhibited radon levels above the USEPA's residential action level of 4 pCi/L. Radon surveys are currently being performed at facilities within the 70th RRC by Shaw Environmental Group. The radon surveys commenced in July 2006 and results are currently not available.

6.16 UNDERGROUND STORAGE TANKS

During the September 2006 Site visit, a visual inspection was undertaken to locate any USTs on the Property. No evidence of USTs, including vent pipes, fill pipes, concrete pads, and access ways, were observed. According to site personnel no underground petroleum storage tanks are present on the Site. A document from a 1989 Army Site report shows that one UST was present at that time, and contained waste oil and waste transmission fluid. It stated that the tank had a 250-gallon capacity and was installed in 1984. The report also stated that the tank was tentatively planned for replacement by an AST. No additional information was available.

6.17 WASH RACK

A concrete vehicle wash rack was formerly located next to the OWS on the north side of the OMS building. Wash water was directed to a slotted drain by the slope of the pad. The drain flowed to the OWS, which in turn flowed south and then east where it connected to the city sanitary sewer off-site. Site personnel recalled the wash rack and drain were recently removed from the area, however no additional information or documentation was available to determine what was removed and when. Presently only a concrete pad and the OWS are in the area.

6.18 WASTE DISPOSAL SITES

Solid waste is managed on-site in two metal dumpsters. The dumpsters are picked up weekly by Waste Management of Spokane. Non-hazardous waste management, such as waste oil, is managed by DRMO. There were no signs of land-filling or illegal waste disposal activities at the Site during the September 2006 site visit.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

Figure 9 in Appendix A provides a 1982 aerial photograph of the USAR Center and surrounding properties and depicts current land use. The Site is zoned I-3 Industrial, the general nature of the area is light industrial, and commercial. Spokane Industrial Park is the dominant land use in the immediate vicinity.

7.2 COASTAL ZONE MANAGEMENT

According to the Department of Energy Environmental Policy & Guidance website for Coastal Zone Management Act and related regulations, Spokane County Washington does not lie within a coastal zone management area (www.eh.doe.gov/oepa/laws/czma.html).

7.3 WETLANDS

According to the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map, no jurisdictional wetland areas are identified on the Site or adjacent properties (Overview Map in Appendix E).

7.4 100-YEAR FLOOD PLAIN

A review of the FEMA digital Flood Hazard Area map indicates that the Site lies outside the 100-year and 500-year flood plains (Overview Map in Appendix E).

7.5 NATURAL RESOURCES

No Site specific survey addressing natural resources was available for review. Based on discussions with the Environmental Program Contracting Manger for the 70th RRC, there are no issues of environmental concern related to natural resources at the Site.

7.6 CULTURAL RESOURCES

Based on discussions with the Environmental Program Contracting Manger for the 70th RRC, there is neither sites of cultural or traditional religious significance nor historic properties identified at the Site. Furthermore, the Site is not identified in the National Register of Historic Places Information System database, though no cultural resource survey has been performed.

8.0 CONCLUSIONS

Lawhon & Associates, Inc. in conjunction with FMSM was contracted to prepare an ECP report for the 1LT Richard H. Walker U.S. Army Reserve Center WA046, located at 3800 North Sullivan Road, Spokane, Spokane County, Washington. The USAR Center is situated on approximately 10 acres of land, located in an industrial and commercial area. The Site consists of three permanent buildings: an administration building, an OMS building, and a three-sided hazmat structure.

The USAR Center is currently occupied by the 659th Construction Company, the 164th Maintenance Company, and the 3/415TH Brigade Combat Team. The Site has been a USAR Center since the administration building was constructed in 1978. The OMS building was constructed in 1983, while a three-sided hazmat structure was constructed in 1990. In 2001, the USAR Center was renovated. The United States of America owns the land and the buildings.

Findings of this ECP are based on interviews, existing environmental information, including visual observations, site records, Federal, State, and Local database and file information, related to the storage, release, treatment, or disposal of hazardous substances or petroleum products or derivatives on the property. The following paragraphs present the findings related to areas of potential environmental concern that were evaluated during the ECP process.

- **Aboveground Storage Tanks** – One 400-gallon, double-walled, rectangular, steel used oil AST is located in the three-sided hazmat storage structure. This structure is cinderblock on three sides with a lockable chain-link gate in the front. No stains or evidence of spills were observed around the AST.
- **Asbestos Containing Materials** - A table provided by the 70th RRC listing the status of ACM surveys for its facilities shows that an asbestos survey has been performed at the Site with a report dated April, 1994. A copy of this survey was not provided for this study, however, Site personnel indicated there was a known asbestos problem in the boiler room, and it was being addressed. It is unknown if the problem involves friable or non friable asbestos. No further information could be provided.
- **Hazardous Substances** - Chemicals containing CERCLA hazardous substances may have been used and stored at the Site in amounts necessary to support unit-level vehicle and building maintenance activities. However, there is no evidence that hazardous substances above reportable quantities were stored for one year or more, released, or disposed at the Site.
- **Indoor Firing Range** - Historically, the Site operated an indoor firing range. In March – May 2001, a range removal and abatement was performed including cleaning and removing items stored in the area, removing sound deadening

board and acoustical tile ceiling, removing the bullet trap and associated lead (no sand), cleaning the range, cleaning and removing the air handling system, and collecting and analyzing clearance samples. Lead clearance levels were attained. The area now acts as a company and unit storage area.

- **Lead-Based Paint** - According to information provided by the 70th RRC, there are no documented LBP surveys or abatement projects at the Site. Based on the date of construction of the administration building (1978), it is likely that LBP exists in the structure. The OMS, however, was constructed in 1983, and due to its more recent date of construction, may not contain LBP. During the September 2006 Site visit, painted surfaces within the administration and OMS buildings appeared to be in fair to good condition, with the exception of silver paint flaking in the boiler room of the administration building.
- **Mold** - Mold was observed in the boiler room in an area where leaking pipes were present. There was no additional information available regarding mold at the site.
- **Munitions and Explosives of Concern** - No indications were found during the site visit or records review process of the past presence of MEC, including unexploded ordnance. A locked small arms vault is located within the administration building.
- **Nearby Properties** - Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site were evaluated. Overall, none of the sites evaluated exhibit environmental conditions that have a significant probability to adversely affect environmental conditions at the Site.
- **Oil/Water Separator** - An OWS is located adjacent to the OMS and a former concrete vehicle wash rack. Records indicate that it was installed in 1984. Drains from both the OMS and former wash rack connected to the OWS subsequently discharging into the City of Spokane Valley sanitary sewer. Currently only the drains from the OMS connect to the OWS. Trapped material is removed and the unit is cleaned on an as-needed basis by a commercial firm. According to Site personnel, the most recent cleaning was conducted in 2006.
- **Petroleum Product Storage** – According to Site personnel, mobile diesel fuel trucks are routinely parked in the MEP area. A portable secondary containment is placed around the trucks when they contain fuel. During the September 2006 Site visit, a 5,000-gallon mobile fuel truck was parked in the MEP area. Secondary containment was not in use, because Site personnel stated that the truck's tank was empty.

Records indicate that a 25-gallon diesel fuel spill occurred on a paved surface in March 2004. Site personnel and the 70th RRC representative knew very little

about the spill, but believed that it occurred associated with a mobile fuel truck near the northeast corner of the OMS. Database records do not indicate if a clean up was performed. No reports or other documents were available. According to Site personnel, a consultant was hired to sample, remove, and dispose of soil in the area of the spill. The personnel thought the work was done through the U.S. Army Corps of Engineers.

Additional petroleum storage occurs and historically would have occurred in designated areas within the OMS building and hazmat storage sheds and structure. Oil and automotive products were kept primarily in the hazmat sheds and the oil distribution room in the OMS.

- **Pits, Ponds, Sumps, Drywells, and Catch Basins** - A 2004 Survey of Drains, Pollution Control Equipment, and Discharge Points identified one exterior surface drain, three dry wells, and an OWS at the Site. In addition, eight interior floor drains are identified, three in the kitchen area and one in the mechanical room of the administration building, and four in the OMS. A grease trap is also located in the dishwashing area of the kitchen.

According to Site personnel, the one exterior drain was recently removed. It formerly was located adjacent to a concrete vehicle wash pad, and connected to the OWS. The interior drains in the OMS are slotted trench drains just inside each of the bays. The slotted floor drains discharge into the OWS. The administration building interior drains are tied into the city's sanitary sewer system. The report states that the grease trap also discharges to the sanitary sewer system. The three drywells are not connected to any other structures and have gravel bottoms and slotted sides for infiltration of storm water runoff.

- **PCB Equipment** - Based upon information provided by the 70th RRC, there is no known PCB containing equipment at this facility; however, PCBs may be contained in light ballasts in older type light fixtures. Based on the construction date of the buildings it is possible that some of these ballasts could potentially contain PCBs. However, most if not all ballasts may have been replaced during the 2001 renovation. Any light ballast not marked with "No PCBs" should be managed as if they contain PCBs and management and disposal of these light ballasts must be in accordance with Local, State and Federal requirements.
- **PCB Transformers** - A pad mounted transformer is located at the southeast corner of the administration building. The transformer has a label certifying that the transformer contains less than 50 ppm PCBs.
- **Radiological Materials** - Facility personnel indicated that to their knowledge the Site never had a Nuclear Regulatory permit. Most military facilities will have some low level radiological materials associated with the illumination of various types of military equipment (e.g., watch dials, compasses, aiming circles, etc.).

There is no evidence to suggest that any radiological commodities were ever improperly managed at the Site, or that any radionuclides were ever released

- **Radon** - Information provided by the 70th RCC shows that a radon survey was performed at the site in 1991. Based on the sampling results, no locations sampled exhibited radon levels above USEPA's residential action level of 4pCi/L. Radon surveys are currently being performed at facilities within the 70th RRC by Shaw Environmental Group. The radon surveys commenced in July 2006 and results are currently not available.
- **Underground Storage Tanks** - According to site personnel no underground petroleum storage tanks are present on the Site. A document from a 1989 Army Site report shows that one UST was present at that time, and contained waste oil and waste transmission fluid. It stated that the tank had a 250-gallon capacity and was installed in 1984. The report goes on to state that the tank was leak tested in 1987, and that no leaks were detected. In addition, the tank was tentatively planned for replacement by "an AST in a concrete curbed waste oil building". It is presumed that the three-sided cinder block hazmat structure, that houses the 400-gallon AST currently in use, is what the report called the "concrete curbed waste oil building". There was no indication of any USTs observed during the September 2006 Site visit, nor were any documents available showing removal or decommissioning of a tank. In addition, there is no information regarding the location or former location of any USTs.
- **Wash Water Discharge** - A concrete vehicle wash pad was formerly located next to the OWS on the north side of the OMS building. Wash water was directed to a slotted drain by the slope of the pad. The drain flowed to the OWS, which in turn flowed south and then east where it connected to the city sanitary sewer off-site. Site personnel recalled the wash rack and drain were recently removed from the area, however no additional information or documentation was available to determine what was removed and when. No evidence of environmental sampling or testing was available for the area.

In accordance with Department of Defense policy defining the classifications (See Deputy Under Secretary of Defense Goodman Memorandum dated 21 October 1996), the Site has been classified as Category 2, an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred. This classification is based on the 25-gallon fuel spill in 2004.

9.0 LIMITATIONS

This ECP Report was prepared to review certain elements of the environmental condition of property related to the storage, release, treatment, or disposal of hazardous substances or petroleum products. It documents efforts to determine or discover the presence or likely presence of a release or threatened release of these materials. Project activities were performed in general conformance with the BRRM, ASTM D6008 guidance, the project prescribed scope of work, and generally accepted practices in the consulting industry. The degree of care and skill is consistent with that generally exercised in the industry under similar conditions.

Lawhon & Associates, Inc. has relied on certain information provided by the USACE, USAR, and other parties referenced in the report. This information was assumed to be accurate and complete unless information to the contrary arose during the course of the investigation. Historic documentation (e.g., information on past environmental practices, environmental records, USARC operational changes, unit and equipment changes, chemical/substance inventories and storage, current as-built drawings, etc.) and facility personnel knowledge regarding chemicals used or stored on the Site and the quantities stored, was often limited or non-existent. Therefore, statements regarding storage of chemicals or presence of hazardous substances reflect best available data and are not warranted for either completeness or accuracy over the history of the facility.

In preparing this report, Lawhon & Associates, Inc., was required to review previous documents from other sources (collectively referred to herein as the Prior Reports). The Prior Reports may present findings regarding the abatement or remediation of *known* concerns at the time of their preparation or within the limit of the project scope of work. The Prior Reports may include statements or opinions of the original authors of the Prior Reports as to the satisfactory completion of work. Lawhon & Associates, Inc., notes that environmental laws and regulations, including abatement or remedial action levels, are periodically reviewed and updated by the various regulatory agencies and may have changed since the respective dates of the Prior Reports.

Lawhon & Associates, Inc. has summarized certain of the Prior Reports in fulfilling the project prescribed scope of work. This summarization may include statements or opinions as to the satisfactory completion of work. These statements or opinions are those of the original report authors. Lawhon & Associates, Inc. neither warrants nor certifies the accuracy or completeness of these statements. The summarization of previous documents has not reviewed or updated those conclusions with regards to actions from the time of that document to date, current regulatory agency abatement, or remedial standards. Rather, this summary provides the original author's conclusions at the time the report was prepared. Evaluation of the completeness of previous documents or statements of abatement or remediation is beyond the current scope of service included in this contract.

A limited site reconnaissance was performed to visually identify materials or conditions representing recognized adverse environmental conditions. Identification of hidden conditions, observation of the effects of activities or incidents occurring after completion of the reconnaissance, buried conditions, conditions obscured by dense foliage, conditions beneath buildings, other structures, or covered by building/paving materials, or conditions otherwise obscured, is beyond the scope of this work. The conditions described in this report are valid only at the time that the observations were made. Some conditions may change with time.

The findings and conclusions contained in this report are based in part on the information available at the time of the study. The findings and conclusions should be considered not as scientific certainties, but as probabilities based on professional judgment of the significance of the limited data gathered in the course of the site evaluation, interviews and literature review. If additional or corrected information becomes available, Lawhon & Associates, Inc., requests the opportunity to review/modify conclusions, as warranted.

10.0 REFERENCES

10.1 PERSONS CONTACTED

- Sgt. Shona Keefe, Unit Administrator, 1LT Richard H. Walker USAR Center, Spokane Valley, WA, (509) 891-4341, September 7, 2006.
- CW4 Randy Hone, Facility Coordinator, 1LT Richard H. Walker USAR Center, (509) 891-4341, September 7, 2006.
- Mr. Patrick Marchman, Environmental Program Manger, ICI, LLC, U.S. Army Reserves 70th Regional Readiness Command, (206) 301-2091, September 7, 2006.

10.2 RESOURCES CONSULTED

- Environmental Data Resources, Inc. (EDR) Report for the 1LT Richard H. Walker USAR Center, July 14, 2006.
- Federal Regulatory Databases
 - National Priorities List (NPL), April 19, 2006
 - Proposed NPL Sites, April 19, 2006
 - Delisted NPL Sites, April 19, 2006
 - Federal Superfund Liens (NPL Liens), October 15, 1991
 - Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), February 1, 2006
 - CERCLIS No Further Remedial Action Planned Sites (NFRAP), February 1, 2006
 - Resource Conservation and Recovery Information System (RCRIS) Corrective Action Sites (CORRACTS), March 15, 2005
 - Resource Conservation and Recovery Act Information (RCRA), March 9, 2006
 - Emergency Response Notification System (ERNS), December 31, 2005
 - Engineering Controls Sites List (US ENG CONTROLS), March 21, 2006
 - Listing of Brownfields Sites, April 26, 2006

- Superfund Consent Decrees, December 14, 2004
- Records of Decision (ROD), March 13, 2006
- Department of Defense Sites, December 31, 2004
- Uranium Mill Tailings Sites, November 4, 2005
- Open Dump Inventory (ODI), June 30, 1985
- Toxic Chemical Release Inventory System (TRIS), December 31, 2003
- Toxic Substances Control Act (TSCA), December 31, 2002
- FIFRA/TSCA Tracking System, March 29, 2006
- FTTS INSP, March 31, 2006
- Section 7 Tracking Systems (SSTS), December 31, 2004
- Integrated Compliance Information System (ICIS), February 13, 2006
- PCB Activity Database System (PADS), December 27, 2005
- Material Licensing Tracking System (MLTS), April 12, 2006
- Mines Master Index File (MINES), February 9, 2006
- Facility Index System/Facility Registry System (FINDS), April 27, 2006
- RCRA Administrative Action Tracking System (RAATS), April 17, 1995
- Biennial Reporting System (BRS), December 31, 2003
- State and Local Regulatory Databases
 - Confirmed and Suspected Contaminated Sites List, May 11, 2006
 - Hazardous Sites List, March 27, 2006
 - Confirmed & Contaminated Sites – No Further Action, May 11, 2006
 - Solid Waste Facility Database, October 01, 2004
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- Underground Storage Tank Database, April 27, 2006
 - Aboveground Storage Tank Locations, December 12, 2005
 - Hazardous Waste Manifest Data, December 31, 2004
 - Reported Spills, March 29, 2006
 - Institutional Control Site List, June 06, 2006
 - Voluntary Cleanup Program Sites, May 11, 2006
 - Independent Cleanup Reports, December 01, 2002
 - Drycleaner List, January 12, 2006
 - Clandestine Drug Lab Contaminated Site List, May 23, 2006
 - Washington Emissions Data System, December 31, 2004
 - Inactive Drycleaners, January 01, 2006
 - Tribal Records
 - Indian Reservations, December 31, 2004
 - Leaking Underground Storage Tanks on Indian Land, April 14, 2006
 - Underground Storage Tanks on Indian Land, April 05, 2006
 - EDR Proprietary Records
 - Manufactured Gas Plants
 - Historical Auto Stations
 - Historical Cleaners
 - Historical Chain of Title Report for the 1LT Richard H. Walker USARC, September 14, 2006.
 - Environmental Lien Search Report for the 1LT Richard H. Walker USARC, September 14, 2006.
 - State of Washington Department of Ecology, Coastal Zone Management Program, September, 2006,
<http://www.ecy.wa.gov/programs/sea/czm/index.html>.

- State of Washington State Department of Natural Resources Geology of Washington, Columbia Basin Area website, September, 2006, <http://www.dnr.wa.gov/geology/columbia.htm>.
- USEPA Map of Radon Zones, <http://www.epa.gov/radon/zonemap/washington.htm>.
- U.S. Army Toxic and Hazardous Materials Agency (USATHAMA) Property Report Database Printout, February 1989.
- Radon Site Results, 70th RRC, 1991.
- Oil/Water Separators and Storm Drainage System Improvements, KPFF Consulting Engineers, 1993.
- Asbestos Survey Status Table for the 70th RRC Facilities, 70th RRC, 1994.
- Range Cleanup Report, IT Corporation, 2002.
- Stormwater and Assessment Guidance, Weston Solutions, 2003.
- Draft Survey of Drains, Pollution Control Equipment, and Discharge Points, ICI, LLC, September 2004.
- Final Polychlorinated Biphenyl (PCB)-Containing Equipment Inventory Summary Report, Spokane Area and Pasco Area Facilities, Engineering-Environmental Management, Inc., March 2005.
- Environmental Compliance Assessment Report, 70th RRC, 2005.
- Spill Prevention, Control, and Countermeasure Plan, Shaw Environmental, Inc., 2006.

10.3 AGENCIES CONTACTED

- Ms. Sally Perkins, Washington Department of Ecology, 3190 160th Avenue SE, Bellevue, WA, August 10, 2006.
- US EPA, Region 10 FOIA Officer, 1200 6th Avenue, Seattle, WA, August 10, 2006.
- Planning Department, City of Spokane Valley Planning Department, (509) 921-1000, September 28, 2006