

**FINDING OF SUITABILITY TO TRANSFER
(FOST)**

**SFC Nelson V. Brittin U.S. Army Reserve Center (NJ001)
3911 Federal Street
Pennsauken, New Jersey 08110**

October 2012

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1. PURPOSE

The purpose of this Finding Of Suitability To Transfer (FOST) is to document the environmental suitability of certain parcels or property at SFC Nelson V. Brittin U.S. Army Reserve (USAR) Center for transfer to the Pennsauken Township consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy. In addition, the FOST includes the CERCLA Notice, Covenant, and Access Provisions and other Deed Provisions and the Environmental Protection Provisions (EPPs) necessary to protect human health or the environment after such transfer.

2. PROPERTY DESCRIPTION

The property consists of 7.7 acres, which includes three permanent buildings: Administration Building, Organizational Maintenance Shop (OMS), and cold storage building. Approximately 0.5 acres of the Property is undeveloped land. The property was previously used as administrative, training and logistical purposes and vehicle and equipment maintenance. Five acres of the property is intended to be transferred to the Pennsauken Township's Office of Emergency Management for use as offices in the administrative building, vehicle use in the maintenance shop, and the construction of a silo for salt storage. Two acres of undeveloped property are intended to be transferred to the Volunteers of America for construction of at least 12 new housing units with support center and open space. Both reuses are consistent with the intended reuse of the property as set forth in the Pennsauken Township's reuse plan. A site map of the property is attached (Enclosure 1).

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the property was made based upon an Environmental Condition of Property (ECP) Report prepared in May 2007 and supplemented by an ECP Update Report in Feb 2012 and an ECP Recertification in September 2012. The information provided is a result of a complete search of agency files during the development of these environmental surveys.

A complete list of documents providing information on environmental conditions of the property is attached (Enclosure 2).

4. ENVIRONMENTAL CONDITION OF PROPERTY

The DOD Environmental Condition of Property (ECP) categories for the property are as follows:

ECP Category 3: SFC Nelson V. Brittin USAR Center (NJ001); entire parcel including all building structures.

A summary of the ECP categories for parcels and the ECP category definitions is provided in Table 1 – Description of Property (Enclosure 3).

4.1. Environmental Investigation Sites

The following investigation sites were located on the property: A summary of the investigation sites on the property is as follows: 1) The 2007 ECP Report recommended additional investigation in the vicinity of a former 55-gallon drywell connected to the sink inside the OMS. In August 2009, a subsurface investigation was performed in the area of the former drywell. Several metals, volatile organic compounds (VOCs), and Semi-VOCs (SVOCs) were detected, but below New Jersey Department of Environmental Protection (NJDEP) Residential Direct Contact Soil Cleanup Criteria (RDCSCC) or Non-Residential Direct Contact Soil Cleanup Criteria (NRDCSCC). All environmental soil and groundwater investigation activities on the property have been completed. Refer to Section 6.0 of the 2012 ECP Update Report; specifically *Phase II Environmental Site Assessment, SFC Nelson V. Brittin U.S. Army Reserve Center (NJ001), Pennsauken, New Jersey* (CH2M Hill, 2009) for additional information.

4.2. STORAGE, RELEASE, OR DISPOSAL OF HAZARDOUS SUBSTANCES

There is no evidence that hazardous substances were stored, released or disposed of on the Property in excess of 40 CFR Part 373 reportable quantities. Refer to Section 3.3 of the 2007 ECP Report for additional information. See Table 2 – Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 4).

4.3. PETROLEUM AND PETROLEUM PRODUCTS

4.3.1. UNDERGROUND AND ABOVE-GROUND STORAGE TANKS (UST/AST)

- **Current UST/AST Sites** - There are no current underground petroleum storage tanks (USTs) on the property. One empty, waste oil AST is located behind the Administration Building, scheduled for removal. There is no evidence of petroleum releases from this AST.
- **Former UST/AST Sites** - There were four underground petroleum storage tanks (USTs) that have been removed or closed in place: one 1,000-gallon fuel oil tank; one 6,000-gallon fuel oil tank; one 3,000-gallon gasoline tank; and one 2,000-gallon diesel tank. The tanks were removed in 1996 and a subsurface investigation conducted. Soil sample analytical results were below New Jersey Department of Environmental Protection (NJDEP) guidelines. The Property was listed in NJDEP records on the Leaking Underground Storage Tank (LUST) database; however the

incident was granted a No Further Action Status (NFA) on September 15, 1997. See *Underground Storage Tank Closure Site Assessment, Brittin USAR Center, 3911 Federal Street, Camden, New Jersey 08051* (ERD Environmental, Inc., 1997) for additional information.

A summary of the UST/AST petroleum product activities is provided in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 5).

4.3.2. Non-UST/AST Storage, Release, or Disposal of Petroleum Products

There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on the property.

4.4. POLYCHLORINATED BIPHENYLS (PCB)

There is no evidence that PCB-containing equipment is located or was previously located on the property.

4.5. ASBESTOS

There is asbestos-containing material (ACM) in the following buildings: Administration Building and OMS Building. See *Asbestos Visual Inspection Report* (Small Business Group, July 2012) for additional information (Enclosure 9).

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the Grantee will be notified of the presence of the ACM and the property will only be transferred if the Grantee agrees to undertake any and all asbestos abatement or remediation that may be required under applicable law. Further, the Grantee will covenant and agree that its use and occupancy of the property will be in compliance with all applicable laws relating to asbestos. The deed will include an asbestos warning and covenant (Enclosure 7).

4.6. LEAD-BASED PAINT (LBP)

The following buildings are known or presumed to contain lead-based paint (LBP): Administration Building and OMS. See Section 6.7 of the 2007 ECP Report for additional information. The property was not used for residential purposes and the transferee does not intend to use the property for residential purposes in the future.

The following buildings are known to contain lead contaminated dust from a former indoor firing range: Administration Building. Lead contaminated dust was remediated after the range was closed in 2000, and confirmation sampling indicates lead concentrations below 200 $\mu\text{g}/\text{ft}^2$. See *Firing Range Closure – Lead Dust Remediation, SFC Nelson V. Brittin USARC, Camden, NJ* (Impact Environmental Remediation, 2000), located in Appendix D of the 2007 ECP Report for additional information. The transferee does not intend to use the Administration Building as a child-occupied facility in the future. The deed will include a lead-contaminated dust warning and covenant (Enclosure 7).

4.7. RADIOLOGICAL MATERIALS

There is no evidence that radioactive material or sources were released on the property. All radioactive materials have been removed from the property. The Army completed a radiological survey of the Property in compliance with the accepted federal government protocol (MARSSIM Class 3). The Radiological Assessment Report found no evidence that radiological contamination or radioactive material was present and concluded that the Property can be considered non-impacted and available for unrestricted use relative to radioactive materials. On 18 June 2012, the US Army Chief of Staff for Installations BRAC Deputy concluded the site is free of radiological concerns. See *Results from the Radiological Survey completed at the SFC Nelson V. Brittin Army Reserve Center, Pennsauken, NJ*, June 18, 2012 for additional information (Enclosure 8).

4.8. RADON

Radon surveys were conducted in the Administration Building on the property. Radon was not detected at above the EPA residential action level of 4.0 picocuries per liter (pCi/L) at the USAR Center. See Section 6.8 of the 2007 ECP Report for additional information.

4.9. MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

Based on a review of existing records and available information, there is no evidence that Munitions and Explosives of Concern (MEC) are present on the property. In addition the property has historically been used as an administrative and vehicle maintenance facility. The term "MEC" means military munitions that may pose unique explosives safety risks, including: (A) unexploded ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (B) discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (C) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

4.10. OTHER PROPERTY CONDITIONS

There are no other hazardous conditions on the property that present an unacceptable risk to human health and the environment.

5. ADJACENT PROPERTY CONDITIONS

There are no conditions adjacent to the property that present an unacceptable risk to human health and the environment.

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

There are no environmental remediation orders or agreements applicable to the property being transferred. The deed will include a provision reserving the Army's right to conduct remediation activities if necessary in the future (Enclosure 6).

7. REGULATORY/PUBLIC COORDINATION

The U.S. EPA Region 2, the New Jersey Department of Environmental Protection (NJDEP), and the public were notified of the initiation of this FOST. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate. A copy of the regulatory/public comments and the Army Response are included at Enclosure 10.

8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts associated with the proposed transfer of the property have been analyzed in accordance with the National Environmental Policy Act (NEPA). The results of this analysis are documented in the *Environmental Assessment For Closure, Disposal, And Reuse of the SFC Nelson V. Brittin U.S. Army Reserve Center, Pennsauken Township, Camden County New Jersey* (December, 2011). There were no encumbrances or conditions identified in the NEPA analysis as necessary to protect human health or the environment.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the above information, I conclude that all removal or remedial actions necessary to protect human health and the environment have been taken and the property is transferable under CERCLA section 120(h)(3). In addition, all Department of Defense requirements to reach a finding of suitability to transfer have been met, subject to the terms and conditions set forth in the attached Environmental Protection Provisions that shall be included in the deed for the property. The deed will also include the CERCLA 120(h)(3) Notice, Covenant, and Access Provisions and Other Deed Provisions. Finally, the hazardous substance notification (Table 2) shall be included in the deed as required under the CERCLA Section 120(h) and DOD FOST Guidance.

TOM LEDERLE
ACISM-ODB Deputy

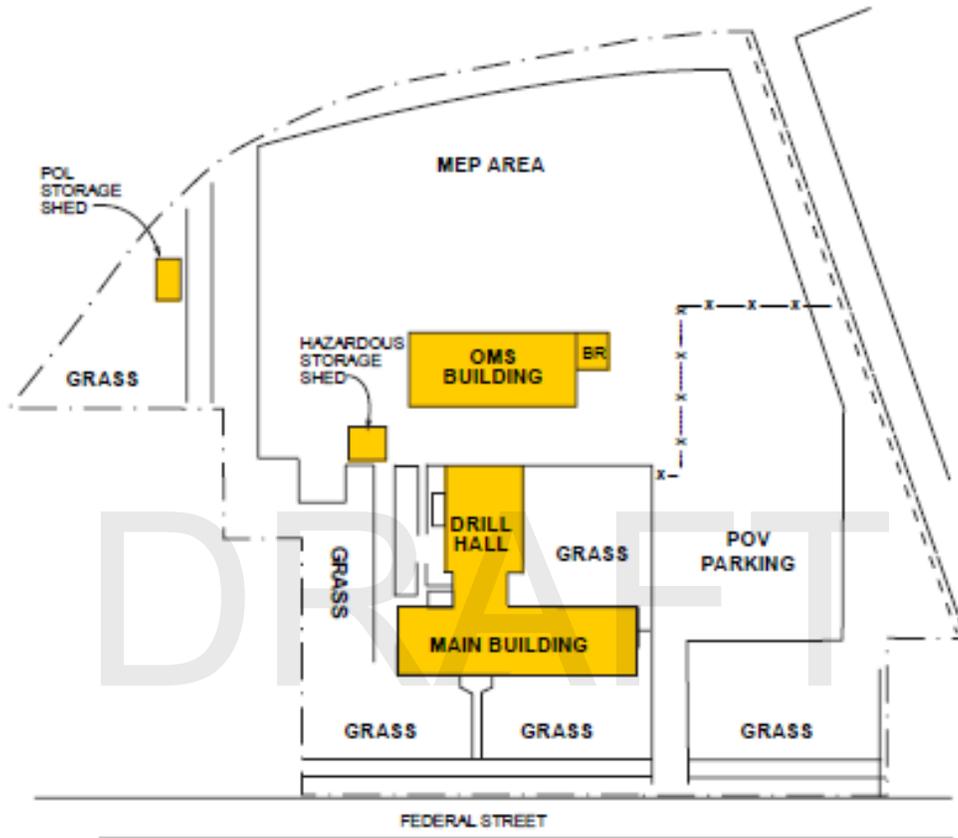
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Enclosures

- Encl 1 - Site Map of Property
- Encl 2 - Environmental Documentation
- Encl 3 - Table 1 -- Description of Property
- Encl 4 - Table 2 -- Notification of Hazardous Substance Storage, Release, or Disposal
- Encl 5 - Table 3 -- Notification of Petroleum Product Storage, Release, or Disposal
- Encl 6 - Access Provision and Other Deed Provisions
- Encl 7 - Environmental Protection Provisions
- Encl 8 - Radiological Memo
- Encl 9 - Asbestos Visual Resinspection Memo
- Encl 10 - Regulatory/Public Comments and Army Response

ENCLOSURE 1

SITE MAP OF PROPERTY



LEGEND

- MEP MILITARY EQUIPMENT PARKING
- POV PRIVATELY OWNED VEHICLE
- OMS ORGANIZATIONAL MAINTENANCE SHOP
- BR BOILER ROOM
- - - PROPERTY LINE
- x- FENCE LINE



ENCLOSURE 2

ENVIRONMENTAL DOCUMENTATION

Document	Source
Environmental Condition of Property Report, SFC Nelson V. Brittin U.S. Army Reserve Center (NJ001), 3911 Federal Street, Pennsauken, NJ, CH2M Hill, May 2007	USACE
Environmental Condition of Property Update Report, SFC Nelson V. Brittin U.S. Army Reserve Center (NJ001), 3911 Federal Street, Pennsauken, NJ, XCEL Engineering, February 2012	USACE
Finding of No Significant Impact, Environmental Assessment For Closure, Disposal, And Reuse of the SFC Nelson V. Brittin U.S. Army Reserve Center, Pennsauken Township, Camden County New Jersey (December, 2011)	99 th RSC
Results from the Radiological Survey completed at the SFC Nelson V. Brittin Army Reserve Center, Pennsauken, NJ, June 2012	99 th RSC
Underground Storage Tank Closure Site Assessment, Brittin USAR Center, 3911 Federal Street, Camden, New Jersey 08051 (ERD Environmental, Inc., 1997)	99 th RSC
Firing Range Closure – Lead Dust Remediation, SFC Nelson V. Brittin USARC, Camdin, NJ (Impact Environmental Remediation, 2000)	99 th RSC
Phase II Environmental Site Assessment, SFC Nelson V. Brittin U.S. Army Reserve Center (NJ001), Pennsauken, New Jersey (CH2M Hill, 2009)	99 th RSC
Environmental Condition of Property Update, XCEL Engineering, February 2012	99 th RSC
Environmental Condition of Property Recertification, September 2012	99 th RSC

ENCLOSURE 3

TABLE 1 – DESCRIPTION OF PROPERTY

Building Number and Property Description	Condition Category	Remedial Actions
The entire Parcel including all buildings.	3	Complete. Metals, VOCs, and SVOCs were detected in soil samples collected in the area of a former drywell, but at concentrations that do not require a removal or remedial response. Refer to Section 4.1 of this FOST for additional information.

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred. (including no migration of these substances from adjacent areas)

Category 2: Areas where only release or disposal of petroleum products has occurred.

Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.

Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

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ENCLOSURE 4

TABLE 2 – NOTIFICATION OF HAZARDOUS SUBSTANCE STORAGE, RELEASE OR DISPOSAL

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
OMS - Former 55-Gallon Drywell	None Detected above NJDEP Action Levels	1953 until closing (date not provided)	Complete. Metals, VOCs, and SVOCs were detected in soil samples collected the area of a former drywell, but at concentrations that do not require a removal or remedial response. Refer to Section 4.1 of this FOST for additional information.
<p>* The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or ‘Superfund’) 42 U.S.C. §9620(h). This table provides information on the storage of hazardous substances for one year or more in quantities greater than or equal to 1,000 kilograms or the hazardous substance’s CERCLA reportable quantity (which ever is greater). In addition, it provides information on the known release of hazardous substances in quantities greater than or equal to the substance’s CERCLA reportable quantity. See 40 CFR Part 373.</p>			

ENCLOSURE 5

TABLE 3 – NOTIFICATION OF PETROLEUM PRODUCT STORAGE, RELEASE, OR DISPOSAL

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
OMS	No. 2 Fuel Oil	1953 to 1996	Complete. A 1,000-gallon UST was removed from the ground in 1996 and a subsurface investigation conducted. Soil sample analytical results were below NJDEP guidelines. See <i>Underground Storage Tank Closure Site Assessment, Brittin USAR Center, 3911 Federal Street, Camden, New Jersey 08051</i> (ERD Environmental, Inc., 1997) for additional information.
Administration Building	No. 2 Fuel Oil	1953 to 1996	Complete. A 6,000-gallon UST was removed from the ground in 1996 and a subsurface investigation conducted. Soil sample analytical results were below NJDEP guidelines. See <i>Underground Storage Tank Closure Site Assessment, Brittin USAR Center, 3911 Federal Street, Camden, New Jersey 08051</i> (ERD Environmental, Inc., 1997) for additional information.
OMS	Gasoline	1953 to 1996	Complete. A 3,000-gallon UST was removed from the ground in 1996 and a subsurface investigation conducted. Soil sample analytical results were below NJDEP guidelines. See <i>Underground Storage Tank Closure Site Assessment, Brittin USAR Center, 3911 Federal Street, Camden, New Jersey 08051</i> (ERD Environmental, Inc., 1997) for additional information.

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
OMS	Diesel	1953 to 1996	Complete. A 2,000-gallon UST was removed from the ground in 1996 and a subsurface investigation conducted. Soil sample analytical results were below NJDEP guidelines. See <i>Underground Storage Tank Closure Site Assessment, Brittin USAR Center, 3911 Federal Street, Camden, New Jersey 08051</i> (ERD Environmental, Inc., 1997) for additional information
Documented POL Spills at USAR Center	Diesel, Fog Oil (mineral oil)	1996 - 2000	Complete. Several petroleum spills have been documented at the USAR Center: a 5-gallon diesel fuel spill associated with overfill of a saddle tank in 1996; a fog oil (mineral oil) fuel tanker leak in the northwest portion of the MEP area in 1999; and a fog oil spill around a former vehicle fuel pod in 2000. According to provided documentation and interviews with former 77th RSC and current 99th RSC personnel, the spills were remediated in accordance with USAR policy and have been closed. No further action is required. See Section 6.0 of the 2012 ECP Update for additional information.

ENCLOSURE 6

CERCLA NOTICE, COVENANT, AND ACCESS PROVISIONS AND OTHER DEED PROVISIONS

I. Property Covered by Notice, Description, Access Rights, and Covenants Made Pursuant to Section 120(h)(3)(A) of the Comprehensive Environmental Response Compensation, and Liability Act of 1980 (42 U.S.C. Section 9620(h)(3)(A)):

For the SFC Nelson V. BrittinUSAR Center, the Grantor provides the following notice, description, and covenants and retains the following access rights:

A. Notices Pursuant to Section 120(h)(3)(A)(i)(I) and (II) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. Section 9620(h)(3)(A)(i)(I) and (II)):

Pursuant to section 120(h)(3)(A)(i)(I) and (II) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(i)(I) and (II)), available information regarding the type, quantity, and location of hazardous substances and the time at which such substances were stored, released, or disposed of, as defined in section 120(h), is provided in Enclosure 4, attached hereto and made a part hereof.

B. Description of Remedial Action Taken, if Any, Pursuant to Section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(i)(III)):

Pursuant to section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(i)(III)), a description of the remedial action taken, if any, on the property is provided in Enclosure 4 , attached hereto and made a part hereof.

C. Covenant Pursuant to Section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(ii) and (B)):

Pursuant to section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(ii) and (B)), the United States warrants that -

(a) All remedial action necessary to protect human health and the environment with respect to any hazardous substance identified pursuant to section 120(h)(3)(A)(i)(I) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 remaining on the property has been taken before the date of this deed, and

(b) Any additional remedial action found to be necessary after the date of this deed shall be conducted by the United States.

This warranty shall not apply in any case in which the person or entity to whom the property is transferred is a potentially responsible party with respect to such property.

D. Access Rights Pursuant to Section 120(h)(3)(A)(iii) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(iii)):

The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the property, to enter upon the property in any case in which a remedial action or corrective action is found to be necessary on the part of the United States, without regard to whether such remedial action or corrective action is on the Property or on adjoining or nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the Grantee and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the Grantee or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the property and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the Grantee's and the Grantee's successors' and assigns' quiet enjoyment of the property. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the property at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the Grantee, nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the United States.

In exercising such easement and right of access, neither the Grantee nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer or employee of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause: Provided, however, that nothing in this paragraph shall be considered as a waiver by the grantee and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

II. OTHER DEED PROVISIONS:

A. "AS IS"

a. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property and accepts the condition and state of repair of the subject Property. The Grantee

understands and agrees that the Property and any part thereof is offered "AS IS" without any representation, warranty, or guaranty by the Grantor as to quantity, quality, title, character, condition, size, or kind, or that the same is in condition or fit to be used for the purpose(s) intended by the Grantee, and no claim for allowance or deduction upon such grounds will be considered.

b. No warranties, either express or implied, are given with regard to the condition of the Property, including, without limitation, whether the Property does or does not contain asbestos or lead-based paint. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos, lead-based paint, or other conditions on the Property. The failure of the Grantee to inspect or to exercise due diligence to be fully informed as to the condition of all or any portion of the Property offered, will not constitute grounds for any claim or demand against the United States.

c. Nothing in this "As Is" provision will be construed to modify or negate the Grantor's obligation under the CERCLA Covenant or any other statutory obligations.

B. HOLD HARMLESS

a. To the extent authorized by law, the Grantee, its successors and assigns, covenant and agree to indemnify and hold harmless the Grantor, its officers, agents, and employees from (1) any and all claims, damages, judgments, losses, and costs, including fines and penalties, arising out of the violation of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed by the Grantee, its successors and assigns, and (2) any and all any and all claims, damages, and judgments arising out of, or in any manner predicated upon, exposure to asbestos, lead-based paint, or other condition on any portion of the Property after the date of conveyance.

b. The Grantee, its successors and assigns, covenant and agree that the Grantor shall not be responsible for any costs associated with modification or termination of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed, including without limitation, any costs associated with additional investigation or remediation of asbestos, lead-based paint, or other condition on any portion of the Property.

c. Nothing in this Hold Harmless provision will be construed to modify or negate the Grantor's obligation under the CERCLA Covenant or any other statutory obligations.

C. POST-TRANSFER DISCOVERY OF CONTAMINATION

a. If an actual or threatened release of a hazardous substance or petroleum product is discovered on the Property after the date of conveyance, Grantee, its successors or assigns, shall be responsible for such release or newly discovered substance unless Grantee is able to demonstrate that such release or such newly discovered substance was due to Grantor's activities, use, or ownership of the Property. If the Grantee, it successors or assigns believe the discovered hazardous substance is due to Grantor's activities, use or ownership of the Property, Grantee will immediately

secure the site and notify the Grantor of the existence of the hazardous substances, and Grantee will not further disturb such hazardous substances without the written permission of the Grantor.

b. Grantee, its successors and assigns, as consideration for the conveyance of the Property, agree to release Grantor from any liability or responsibility for any claims arising solely out of the release of any hazardous substance or petroleum product on the Property occurring after the date of the delivery and acceptance of this Deed, where such substance or product was placed on the Property by the Grantee, or its successors, assigns, employees, invitees, agents or contractors, after the conveyance. This paragraph shall not affect the Grantor's responsibilities to conduct response actions or corrective actions that are required by applicable laws, rules and regulations.

D. ENVIRONMENTAL PROTECTION PROVISIONS

The Environmental Protection Provisions are at Enclosure 7, which is attached hereto and made a part hereof. The Grantee shall neither transfer the property, lease the property, nor grant any interest, privilege, or license whatsoever in connection with the property without the inclusion of the Environmental Protection Provisions contained herein, and shall require the inclusion of the Environmental Protection Provisions in all further deeds, easements, transfers, leases, or grant of any interest, privilege, or license.

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ENCLOSURE 7

ENVIRONMENTAL PROTECTION PROVISIONS

The following conditions, restrictions, and notifications will be attached, in a substantially similar form, as an exhibit to the deed and be incorporated therein by reference in order to ensure protection of human health and the environment.

1. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT

A. The Grantee is hereby informed and does acknowledge that friable and non-friable asbestos or asbestos containing material "ACM" has been found on the Property. The Property may also contain improvements, such as buildings, facilities, equipment, and pipelines, above and below the ground, that contain friable and non-friable asbestos or ACM. The Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency have determined that unprotected or unregulated exposure to airborne asbestos fibers increases the risk of asbestos-related diseases, including certain cancers that can result in disability or death.

B. The following building(s) on the Property has (have) been determined to contain friable asbestos: Administration Building. The Grantee agrees to undertake any and all asbestos abatement or remediation in the aforementioned buildings that may be required under applicable law or regulation at no expense to the Grantor. The Grantor has agreed to transfer said buildings to the Grantee, prior to remediation or abatement of asbestos hazards, in reliance upon the Grantee's express representation and covenant to perform the required asbestos abatement or remediation of these buildings.

C. The Grantee covenants and agrees that its use and occupancy of the Property will be in compliance with all applicable laws relating to asbestos. The Grantee agrees to be responsible for any future remediation or abatement of asbestos found to be necessary on the Property to include ACM in or on buried pipelines that may be required under applicable law or regulation.

D. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its asbestos and ACM condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos or ACM hazards or concerns.

2. NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP) AND COVENANT AGAINST THE USE OF THE PROPERTY FOR RESIDENTIAL PURPOSE

A. The Grantee is hereby informed and does acknowledge that all buildings on the Property, which were constructed or rehabilitated prior to 1978, are presumed to contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built

prior to 1978 is notified that there is a risk of exposure to lead from lead-based paint that may place young children at risk of developing lead poisoning.

B. The Grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Property, as defined under 24 Code of Federal Regulations Part 35, without complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards. Prior to permitting the occupancy of the Property where its use subsequent to sale is intended for residential habitation, the Grantee specifically agrees to perform, at its sole expense, the abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential Lead-Based Paint Hazard Reduction Act of 1992).

C. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its lead-based paint content and condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any lead-based paint hazards or concerns.

3. NOTICE AND COVENANT CONCERNING LEAD-CONTAMINATED DUST FROM FORMER USE AS AN INDOOR FIRING RANGE

A. Building 100, the Administration Building, on the Property was formerly used as an indoor firing range. Lead-contaminated dust was remediated, and confirmation sampling indicates lead concentrations below 200 $\mu\text{g}/\text{ft}^2$. The Grantee, its successors and assigns are hereby notified and acknowledge that additional lead-contaminated dust remediation may be necessary for a particular use or to comply with applicable law. All costs for any additional remediation for lead-contaminated dust shall be at the sole expense of the Grantee, its successors or assigns, and not the United States. Furthermore, the remediation of lead-contaminated dust inside buildings is not within the scope of releases that make a response action necessary under CERCLA Section 120(h)(3)(A).

4. PESTICIDE NOTIFICATION

A. The Grantee is hereby notified and acknowledges that registered pesticides have been applied to the property conveyed herein and may continue to be present thereon. The Grantee further acknowledges that where a pesticide was applied by the Grantor or at the Grantor's direction, the pesticide was applied in accordance with its intended purpose and consistently with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)(7 U.S.C. § 136, et seq.) and other applicable laws and regulations.

B. The Grantee covenants and agrees that if the Grantee takes any action with regard to the property, including demolition of structures or any disturbance or removal of soil that may expose, or cause a release of, a threatened release of, or an exposure to, any such pesticide, Grantee assumes all responsibility and liability therefore.

ENCLOSURE 8

RADIOLOGICAL MEMO



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

DAIM-ODB

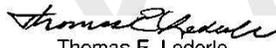
18 June 2012

MEMORANDUM FOR RECORD

SUBJECT: Results from the Radiological Survey at the SFC Nelson V. Brittin U.S. Army Reserve Center (USARC) in Pennsauken, New Jersey

1. On 15 June 2012, the final survey work for the radiological release at the SFC Nelson V. Brittin USARC was completed in compliance with the accepted federal government protocol (MARSSIM Class 3). The enclosed Radiological Survey Report provides an evaluation of radiological materials used and the summary of findings and results. The report concludes that no further action is required with respect to the radioactive devices or materials identified. The site is free of radiological concerns.
2. The point of contact for questions or comments is Mr. Hans Honerlah, Health Physicist, U.S. Army Corps of Engineers, Baltimore District, 410-962-4400, electronic mail hans.b.honerlah@usace.army.mil.

Encl


Thomas E. Lederle
Deputy Chief, ACSIM
BRAC Division

ENCLOSURE 9

ASBESTOS REINSPECTION SURVEY

DRAFT

ASBESTOS VISUAL INSPECTION REPORT



**99TH REGIONAL SUPPORT COMMAND
UNITED STATES ARMY RESERVE
FORT DIX, NEW JERSEY**

SFC NELSON BRITTIN
US ARMY RESERVE CENTER

PENNSAUKEN, NEW JERSEY

(USAR FACID: NJ001 - SITE CODE: 34905)

July 2012

ASBESTOS VISUAL INSPECTION REPORT



**SFC NELSON BRITTIN ARMY RESERVE CENTER
(NJ001) - (34905)
3911 FEDERAL STREET
PENNSAUKEN, NEW JERSEY**

Submitted By



Small Business Group, Inc.
10179 Highway 78
Ladson, South Carolina 29456

Submitted to



United States Army Corps of Engineers
Savannah District

Prepared for



**99TH REGIONAL SUPPORT COMMAND
UNITED STATES ARMY RESERVE
FORT DIX, NEW JERSEY**



3 Terri Lane
Burlington, New Jersey
609-386-8800
Fax 609-386-7951
www.atcassociates.com

Asbestos Visual Inspection



**US Army Reserve Center
3911 Federal Street
Pennsauken, NJ**

Prepared for:
**Mr. Mark Moltzen
SBG EEG
10179 Highway 78
Ladson, South Carolina 29456**

Prepared by:
**ATC Associates Inc.
3 Terri Lane
Burlington, New Jersey 08016**

ATC Project No. 063.43398.0001

July 2012



3 Terri Lane
Burlington, New Jersey 08016
www.atcassociates.com
609.386.8800
Fax 609.386.7951

July 48, 2012

Mark Moltzen
SBG EEG
10179 Highway 78
Ladson, SC 29456

RE: Asbestos Visual Inspection
US Army Reserve Center
3911 Federal Street
Pennsauken, New Jersey
ATC Project #: 63.43398.0001

Dear Mr. Moltzen:

This report details the findings of the asbestos inspection performed by ATC Associates Inc. (ATC) at the above referenced site.

Asbestos Visual Inspection (no sampling)

The visual inspection was performed by ATC on July 13, 2012. The facility consists of two (2) buildings and an associated parking lot. Building 1 is an approximately 25,100 square-foot two-story administrative building with concrete block walls coated with an exterior insulation finishing system (EIFS) and a flat rubber coated roof. Building 2 is an approximately 7,400 square-foot one-story maintenance shop with concrete block walls and flat rubber coated roof. According to a prior report dated December 2004 and prepared by Environmental Enterprises Group, Inc. of North Charleston, South Carolina, both buildings were reportedly constructed in 1953. The asbestos visual inspection included a re-inspection of previously identified asbestos containing building materials (ACM) from the interior and exterior of the facility as well as identifying any observed presumed asbestos containing materials (PACM) which was not identified in the prior report. No samples were collected as part of this scope of work. The inspection was conducted per state and federal regulations.

Please refer to the listing of known and presumed suspect asbestos containing materials (**Appendix A**) and a room by room list of asbestos containing material (**Appendix B**) for details concerning further material description, location, condition, potential for disturbance and approximate quantities of ACM and PACM identified in this inspection. Please refer to the Asbestos Location Diagram (**Appendix C**) for more details.

RECOMMENDATIONS

- Prior to any renovations/demolition to the buildings, any asbestos containing materials that may be disturbed must be removed or abated as required (per State and Federal regulations).
- Suspect ACM that was not sampled during this inspection should be tested prior to disturbance. Inaccessible areas and materials should be surveyed (via selective demo if needed) prior to the start of renovation activities to appropriately determine the extent of necessary abatement.

- Asbestos abatement activities must be performed by State certified abatement contractor following all applicable State and Federal regulations. Abatement activities should be designed by an EPA certified asbestos project designer and overseen by a New Jersey certified asbestos safety technician.

Appendix D contains the appropriate ATC certifications. Thank you for selecting ATC Associates Inc. for your environmental management needs. If you have any questions please do not hesitate to call us at (609) 386-8800.

Sincerely,

ATC ASSOCIATES INC.



Darren K. J. Townsend
Environmental Technician



Brian R. Kearney
Manager, Building Sciences Division

DRAFT

Appendix A

List of Suspect Asbestos Containing Building Materials

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LIST OF CONFIRMED AND SUSPECT ACBM

Prior Report (2004)

According to the Asbestos Inspection Report prepared by Environmental Enterprise Group, Inc., dated December 2004, the following building materials were previously identified as asbestos-containing:

Building 1:

- H-2: 12"x12" Green Marbled Vinyl Floor Tile and Associated Mastic
- H-4: Black Mastic under 12"x12" Tan Marbled Vinyl Floor Tile
- H-6: White Fibrous Cloth Wrapped Pipe Insulation
- H-7: Aircell Pipe Insulation
- H-8: Mudded Pipe Fittings

Building 2:

The report did not identify any ACM in Building 2.

ATC Re-Inspection

ATC's re-inspection confirmed the continued presence of materials H-2, H-6, H-7, and H-8 in Building 1 in the same quantities as were reported in the 2004 report. ATC noted that materials H-6, H-7, and H-8 had since been encapsulated with several layers of paint and appeared to be in good condition. However, ATC noted that the vinyl floor tile associated with material H-4 was not previously sampled. As such, ATC grouped material H-4 together with the associated tan/grey vinyl floor tile (X-6) for the purpose of this re-inspection. In addition to those materials identified in the 2004 report, ATC's re-inspection identified the following suspect ACM at the facility:

Building 1:

- X-1: Fire Doors
- X-2: Door Caulking
- X-3: Dark Brown Cove Base and Associated Mastic
- X-4: Window Caulking
- X-5: 2' x 2' "Spotted" Ceiling Tile
- X-6: 12" x 12" Tan/Grey Marbled Vinyl Floor Tile and Associated Mastic
- X-7: 2' x 2' "Worm-Trail" Ceiling Tile
- X-8: 2' x 2' "Speckled" Ceiling Tile
- X-9: Blue Cove Base and Associated Mastic
- X-10: Carpet Mastic
- Roofing Materials*

Building 2:

- X-1: Fire Doors
- X-2: Door Caulking
- X-11: Window Glazing Putty
- Roofing Materials*

* Based upon communications with the site contact; Mr. Chuck Martin, it is unknown whether original roofing materials are located underneath the rubber coated roofs at Building 1 and 2. As such, both roofs are considered suspect ACM.

DRAFT

Appendix B

Room by Room List of ACBM

DRAFT

US Army Reserve Center
3911 Federal Street, Pennsauken, New Jersey
Room by Room List of ACBM or PACM
ATC Project #63.43398.0001
Page 1 of 14

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Hallway H100						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	20 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	540 LF	Good	Low Potential
Central Stairwell 1st Floor						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	20 LF	Good	Low Potential
East Stairwell 1st Floor						
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	15 LF	Good	Low Potential
Room 100						
Ceilings & Walls	H-6	Cloth Wrapped Pipe Insulation (White Fibrous)	Thermal Systems Insulation (TSI) - Friable	240 linear feet (LF)	Good	Potential for Damage
Ceilings & Walls	H-7	Aircell Pipe Insulation	TSI - Friable	240 LF	Good	Potential for Damage

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

* Indicates materials not previously sampled and presumed to contain asbestos.

Good – No Damage

Damaged – Less than 10% evenly distributed or less than 25% localized.

Significantly Damaged – Greater than 10% evenly distributed or greater than 25% localized.

US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
 Page 2 of 14

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Ceilings & Walls	H-8	Mudded Pipe Fitting	TSI - Friable	97 SF	Good	Potential for Damage
Throughout	X-1*	Fire Door	Miscellaneous Non-Friable	6 units	Good	Low Potential
Throughout	X-2*	Door Caulking	Miscellaneous Non-Friable	102 LF	Good	Low Potential
Room 101						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	60 LF	Good	Low Potential
Room 102						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	80 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	400 SF	Good	Potential for Damage

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US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
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BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Room 103						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	50 LF	Good	Low Potential
Room 104						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	80 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	400 SF	Good	Potential for Damage
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	400 SF	Good	Potential for Damage
Room 105						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 unit	Good	Low Potential

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US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
 Page 4 of 14

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	60 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	300 SF	Good	Potential for Damage
Room 106						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	112 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	740 SF	Good	Potential for Damage
Room 107A						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

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US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
 Page 5 of 14

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Room 107						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	420 SF	Good	Potential for Damage
Room 108						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	700 SF	Good	Potential for Damage
Room 108A						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Room 109						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 units	Good	Low Potential

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US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
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BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Room 110						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	640 SF	Damaged	Potential for Further Damage
Room 111						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	490 SF	Good	Potential for Damage
Room 112A						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	95 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	550 SF	Good	Potential for Damage

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

* Indicates materials not previously sampled and presumed to contain asbestos.

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Damaged – Less than 10% evenly distributed or less than 25% localized.

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US Army Reserve Center
3911 Federal Street, Pennsauken, New Jersey
Room by Room List of ACBM or PACM
ATC Project #63.43398.0001
Page 7 of 14

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Room 112B						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	95 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	550 SF	Good	Potential for Damage
Room 112C						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	95 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	550 SF	Good	Potential for Damage
Room 112D						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	95 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	460 SF	Good	Potential for Damage

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

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US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
 Page 8 of 14

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Room 113						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Room 114						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Hallway H200						
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	510 SF	Good	Potential for Damage
Hallway H201						
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	930 SF	Good	Potential for Damage
Entranceway E001						
Floor	H-2	12" x 12" Vinyl Floor Tile (Green – Marbled) + Mastic	Miscellaneous Non-Friable	900 SF	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	32 LF	Good	Low Potential
Central Stairwell 2nd Floor						

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

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US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
 Page 9 of 14

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Floor	H-2	12" x 12" Vinyl Floor Tile (Green – Marbled) + Mastic	Miscellaneous Non-Friable	10 SF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	34 LF	Good	Low Potential
East Stairwell 2nd Floor						
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Floor	H-2	12" x 12" Vinyl Floor Tile (Green – Marbled) + Mastic	Miscellaneous Non-Friable	10 SF	Good	Low Potential
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Room 200						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	260 SF	Good	Potential for Damage
Floor	X-9	Cove Base (Blue) + Mastic	Miscellaneous Non-Friable	66 LF	Good	Low Potential
Floor	X-10	Carpet (Blue) Mastic	Miscellaneous Non-Friable	260 SF	Good	Low Potential
Room 202						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential

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US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
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BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	360 SF	Good	Potential for Damage
Room 204A						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	310 SF	Good	Potential for Damage
Room 204B						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	360 SF	Good	Potential for Damage
Room 205						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	24 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	520 SF	Good	Potential for Damage
Room 206						

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

* Indicates materials not previously sampled and presumed to contain asbestos.

Good – No Damage

Damaged – Less than 10% evenly distributed or less than 25% localized.

Significantly Damaged – Greater than 10% evenly distributed or greater than 25% localized.

US Army Reserve Center
 3911 Federal Street, Pennsauken, New Jersey
 Room by Room List of ACBM or PACM
 ATC Project #63.43398.0001
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BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	260 SF	Good	Potential for Damage
Floor	X-9	Cove Base (Blue) + Mastic	Miscellaneous Non-Friable	70 LF	Good	Low Potential
Floor	X-10	Carpet (Blue) Mastic	Miscellaneous Non-Friable	290 SF	Good	Low Potential
Room 207						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	350 SF	Good	Potential for Damage
Room 209						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey - Marbled) + Mastic	Miscellaneous Non-Friable	470 SF	Good	Potential for Damage
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	470 SF	Good	Potential for Damage
Room 210A						

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

* Indicates materials not previously sampled and presumed to contain asbestos.

Good - No Damage

Damaged - Less than 10% evenly distributed or less than 25% localized.

Significantly Damaged - Greater than 10% evenly distributed or greater than 25% localized.

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BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	1,500 SF	Good	Potential for Damage
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	470 SF	Good	Potential for Damage
Room 211						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	24 LF	Good	Low Potential
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	390 SF	Good	Potential for Damage
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	390 SF	Good	Potential for Damage
Room 212						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	16 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	500 SF	Good	Potential for Damage
Room 213A						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	32 LF	Good	Low Potential

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

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BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	200 SF	Good	Potential for Damage
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	550 SF	Good	Potential for Damage
Ceiling	X-7	2' x 2' Ceiling Tile ("Worm Trail")	Miscellaneous Non-Friable	150 SF	Good	Potential for Damage
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	200 SF	Good	Potential for Damage
Room 213A						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	40 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	250 SF	Good	Potential for Damage
Floor	X-6†*	12" x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	730 SF	Good	Potential for Damage
Ceiling	X-7	2' x 2' Ceiling Tile ("Worm Trail")	Miscellaneous Non-Friable	250 SF	Good	Potential for Damage
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	230 SF	Good	Potential for Damage
Room 214A						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	32 LF	Good	Low Potential

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

* Indicates materials not previously sampled and presumed to contain asbestos.

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Significantly Damaged – Greater than 10% evenly distributed or greater than 25% localized.

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BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Floor	X-3*	Cove Base (D. Brown) + Mastic	Miscellaneous Non-Friable	106 LF	Good	Low Potential
Ceiling	X-8*	2' x 2' Ceiling Tile ("Speckled")	Miscellaneous Non-Friable	680 SF	Good	Potential for Damage
Room 214B						
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	8 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	210 SF	Good	Potential for Damage
Room 215						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	1 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	17 LF	Good	Low Potential
Wall	X-4*	Window Caulking	Miscellaneous Non-Friable	32 LF	Good	Low Potential
Ceiling	X-5*	2' x 2' Ceiling Tile ("Spotted")	Miscellaneous Non-Friable	730 SF	Good	Potential for Damage
Floor	X-6†*	12' x 12" Vinyl Floor Tile (Tan/Grey – Marbled) + Mastic	Miscellaneous Non-Friable	730 SF	Good	Potential for Damage

† Floor tile not previously sampled. Assumed to cover asbestos-containing black mastic, identified as H-4 in prior report.

* Indicates materials not previously sampled and presumed to contain asbestos.

Good – No Damage

Damaged – Less than 10% evenly distributed or less than 25% localized.

Significantly Damaged – Greater than 10% evenly distributed or greater than 25% localized.

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 Room by Room List of ACBM or PACM
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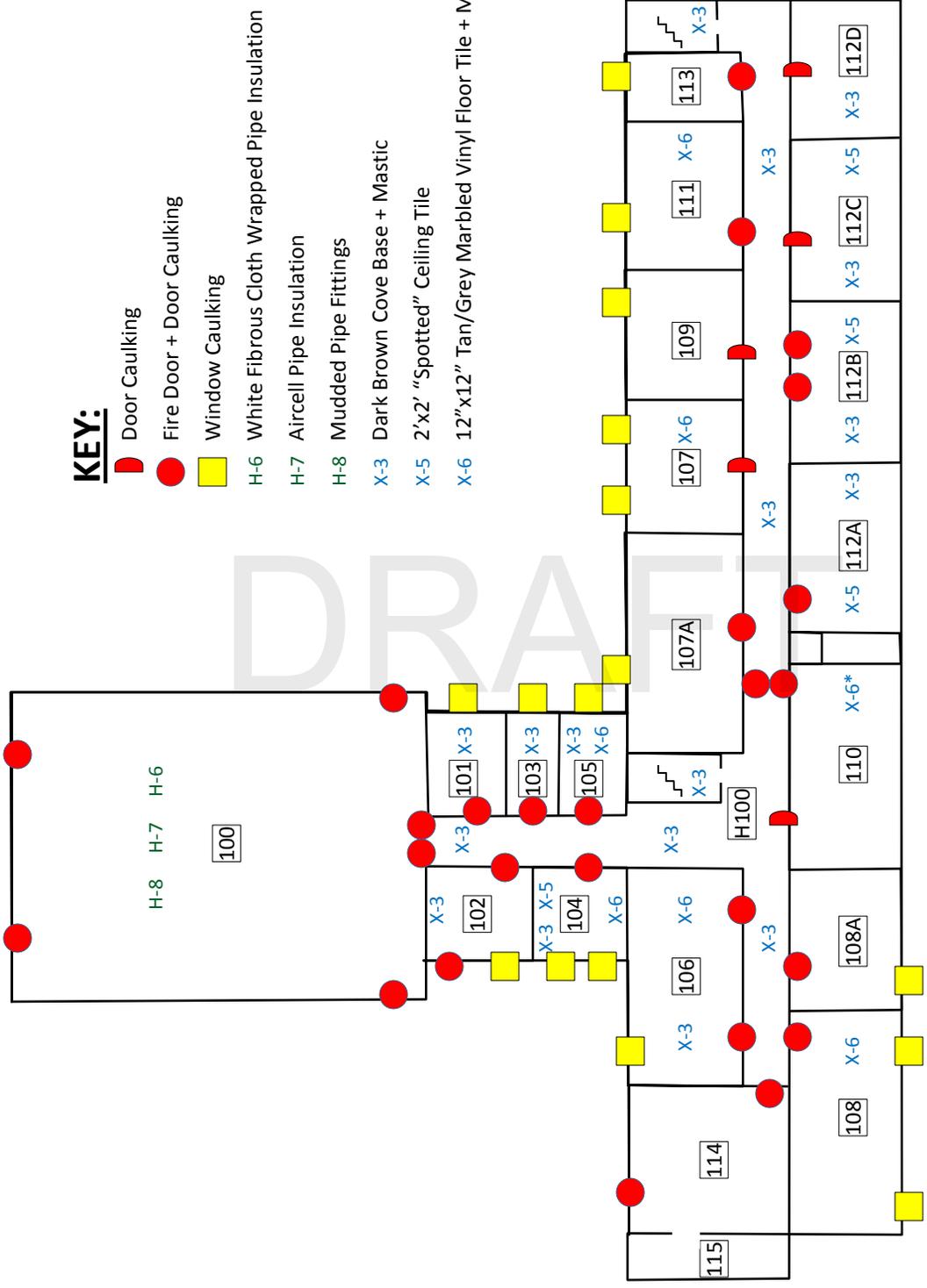
BUILDING 2

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Maintenance Shop Interior						
Wall	X-11*	Window Glazing Putty	Miscellaneous Non-Friable	350 LF	Significantly Damaged	Potential for Further Damage
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	2 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	34 LF	Good	Low Potential
Boiler Room						
Wall	X-1*	Fire Door	Miscellaneous Non-Friable	3 units	Good	Low Potential
Wall	X-2*	Door Caulking	Miscellaneous Non-Friable	37 LF	Good	Low Potential

* Indicates materials presumed to contain asbestos.
 Good – No Damage
 Damaged – Less than 10% evenly distributed or less than 25% localized.
 Significantly Damaged – Greater than 10% evenly distributed or greater than 25% localized.

Appendix C
Asbestos Location Diagram

DRAFT



KEY:

- Door Caulking
- Fire Door + Door Caulking
- Window Caulking
- H-6 White Fibrous Cloth Wrapped Pipe Insulation
- H-7 Aircell Pipe Insulation
- H-8 Mudded Pipe Fittings
- X-3 Dark Brown Cove Base + Mastic
- X-5 2'x2' "Spotted" Ceiling Tile
- X-6 12"x12" Tan/Grey Marbled Vinyl Floor Tile + Mastic

* Indicates damaged material

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 Pennsauken, New Jersey
 ATC Project #: 63.43398.0001

FIGURE 1:
FLOOR PLAN OF BUILDING 1
FIRST FLOOR

SCALE:
 NOT TO SCALE

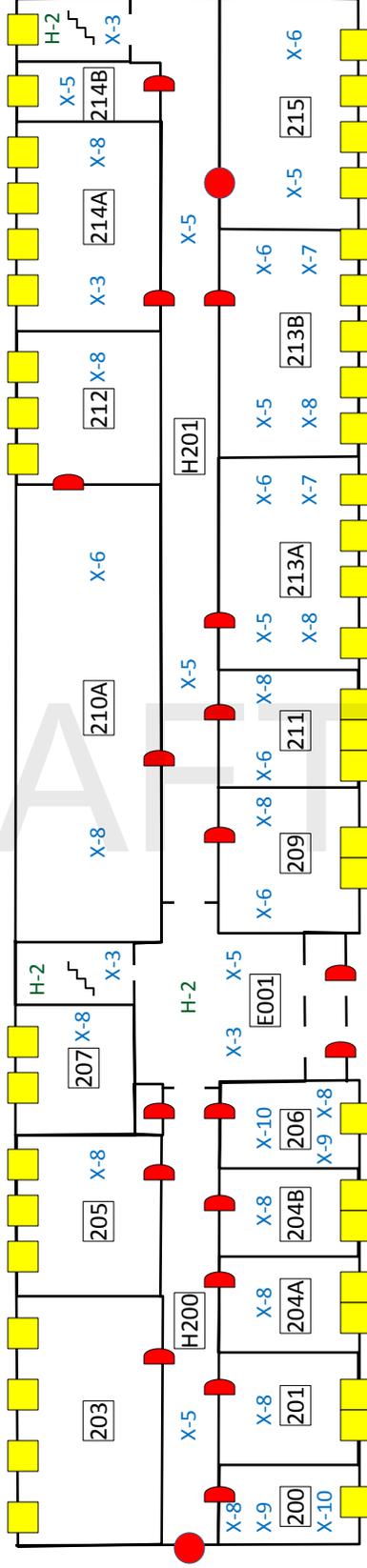


ATC Associates Inc.
 3 Terri Lane
 Burlington, NJ 08016

KEY:

-  Door Caulking
-  Fire Door + Door Caulking
-  Window Caulking
- H-2 12"x12" Green Marbled Vinyl Floor Tile + Mastic
- X-3 Dark Brown Cove Base + Mastic
- X-5 2'x2' "Spotted" Ceiling Tile
- X-6 12"x12" Tan/Grey Marbled Vinyl Floor Tile + Mastic
- X-7 2'x2' "Worm-Trail" Ceiling Tile
- X-8 2'x2' "Speckled" Ceiling Tile
- X-9 Blue Cove Base + Mastic
- X-10 Carpet Mastic

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 Pennsauken, New Jersey
 ATC Project #: 63.43398.0001

FIGURE 2:
FLOOR PLAN OF BUILDING 1
SECOND FLOOR

SCALE:
 NOT TO SCALE



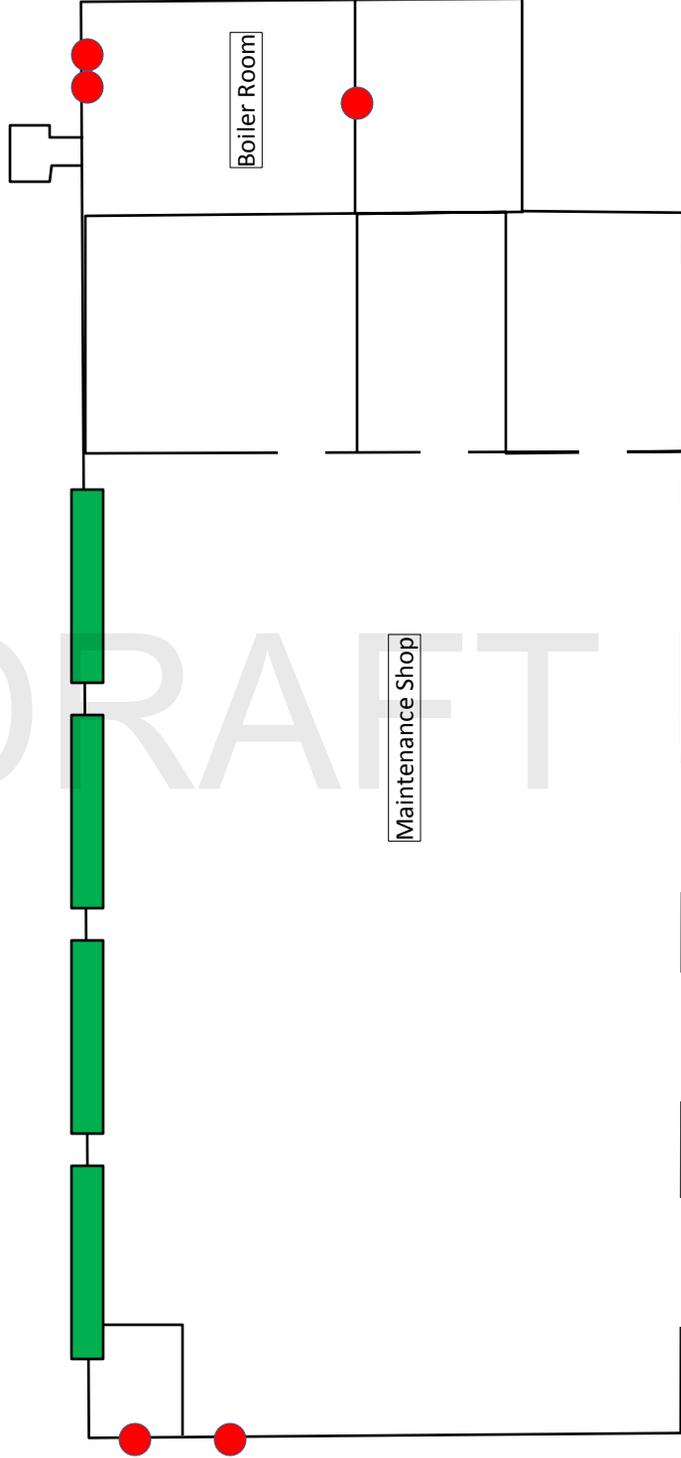
ATC Associates Inc.
 3 Terri Lane
 Burlington, NJ 08016

KEY:

● Fire Door + Door Caulking (X-1/X-2)

■ Window Glazing Putty* (X-11)

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* Indicates damaged material

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Pennsauken, New Jersey
ATC Project #: 63.43398.0001

**FIGURE 3:
FLOOR PLAN OF BUILDING 2**

**SCALE:
NOT TO SCALE**



ATC Associates Inc.
3 Terri Lane
Burlington, NJ 08016

Appendix D

Certifications

DRAFT

Certificate of Completion

Darren Townsend

for successfully completing the prescribed course of study in

**Pennsylvania Asbestos
Building Inspector Refresher Course**

under TSCA Title II

presented by

ACCESS TRAINING SERVICES, INC.

7921 River Road, Pennsauken, NJ 08109

(856) 665-3449

5/24/12

Course Date

5/24/13

Expiration Date

N/A

Exam Date

Not Provided

Social Security Number

ACC-0512-6-008

Certificate Number



Mark K. Schlager

Training Director

ENCLOSURE 10

REGULATORY/PUBLIC COMMENTS & ARMY RESPONSE

- The Notice of Availability was placed in the X and the Draft FOST was placed at the X, from _____ to _____ (see attached [attached affidavit and actual NOA from paper below). No public comments were received during the review period.
- The Draft FOST was sent to NJDEP on DATE. NJDEP commented...
- The Draft FOST was sent to US EPA Region 3 on _____. The EPA responded ...
- Army response to comments...

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