

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

**North Penn U.S. Army Reserve Center (PA139)  
1625 Berks Road  
Norristown, Pennsylvania 19403**

**September 2012**

**DRAFT**

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(FOST)  
North Penn U.S. Army Reserve Center (PA139)  
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**1. PURPOSE**

The purpose of this Finding Of Suitability To Transfer (FOST) is to document the environmental suitability of the North Penn U.S. Army Reserve (USAR) Center property for transfer to the Worcester 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 19.0 acres, improved with seven permanent structures: Administration Building, Organizational Maintenance Shop (OMS), unheated storage building, potable well pump house, and three former missile silos. Approximately 5.0 acres of the Property is undeveloped land. In 1954, the U.S. Government purchased farmland to construct and operate Philadelphia Defense Area Site 91, a Nike Ajax missile facility, from 1954 to 1968. In 1968, the Property was converted to a USAR Center, which was closed in September 2011. USAR Center activities included administrative and logistical training, as well as vehicle and equipment maintenance. The property is intended to be transferred for use as a public park and recreational purposes and is consistent with the intended reuse of the property as set forth in the North Penn USARC Local Redevelopment Authority's Redevelopment 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 the following:

- Environmental Condition of Property (ECP) Report, April 2007
- ECP Update Report, March 2012
- ECP Recertification 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: North Penn USAR Center (PA139); 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 Remediation/Investigation Sites**

There were fifteen (15) remediation/investigation sites located on the property. A summary of the environmental remediation/investigation sites on the property is as follows:

- Site 01 – Fence Line Assessment
- Site 03 – Nike Site Area
- Site 04 – Fuel Oil AST. Also referred to as “250-gallon heating oil, east side of well pump house”
- 250-gallon Waste Oil AST, West Side of OMS
- Site 05 -Fuel Oil UST (Site 05); also referred to as “1,500-gallon heating oil UST, northwest side of OMS”
- Site 07 - FTA Burn Area
- Site 08 - OMS Service Pit Closure
- Former 1,000-gallon unleaded gasoline UST
- Former 20,000-gallon heating oil UST
- Former 5,000-gallon diesel UST, between POV parking area and OMS
- Characterization of groundwater
- No. 2 heating oil spill near potable water well pump house
- Drainage Ditch - Oil-like substance or sheen, which was reportedly flowing from sewer outfall and within the drainage ditch
- Former Spoils Area - reportedly associated with the sewage treatment plant upgrade
- Wash Rack and associated OWS

All environmental soil and groundwater remediation activities on the property have been completed or are in place and operating properly and successfully. See the 2011 ECP Update Report for additional information. A summary of the environmental remediation/investigation sites is provided in Table 2 – Notification of Hazardous Substance Storage, Release, or Disposal and Table 3 – Notification of Petroleum Substance Storage, Release, or Disposal (Enclosures 4 & 5).

##### **4.2. STORAGE, RELEASE, OR DISPOSAL OF HAZARDOUS SUBSTANCES**

Hazardous substances may have been stored for one year or more on the property in excess of reportable quantities specified in 40 CFR Part 373. Nike missile operations were conducted on the Property prior to the enactment of CERCLA reporting and notification requirements. No records

regarding the storage or use of CERCLA hazardous substances on the Property exist. All Army hazardous substance storage operations have been terminated on the Property. There is no evidence that hazardous substances were released or disposed of on the Property in excess of 40 CFR Part 373 reportable quantities. See Section 4.1 Environmental Remediation Sites for additional information. A summary of the buildings or areas in which hazardous substance activities occurred is provided in Table 2 – Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 4). The CERCLA 120(h)(3) Notice, Description, and Covenant at Enclosure 6 will be included in the Deed.

### **4.3. PETROLEUM AND PETROLEUM PRODUCTS**

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

- **Current UST/AST Sites** - There are no underground and/or above-ground petroleum storage tanks (USTs/ASTs) on the property.
- **Former UST/AST Sites** - There were 4 underground and 11 above-ground petroleum storage tanks (UST/AST) on the property that have been removed or closed in place. Petroleum product releases/investigations occurred at the following sites: 5,000-gallon diesel UST between POV parking and the OMS; 1,000-gallon unleaded gasoline UST; former 20,000-gallon heating oil UST; and 250-gallon No. 2 heating oil AST on the east side of the potable well pump house. The release of these petroleum products was remediated at the time of the release or as part of UST/AST closure. There is no evidence of petroleum releases from these sites.

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 (PCBs)**

The following equipment is located on the Property and may contain PCB:

- 1 pole-mounted transformer, located between the OMS and treatment system. This equipment is operational, properly labeled in accordance with federal and state regulations, and has been determined not to be leaking.
- 3 hydraulic-oil tanks. Each of the 3 former Nike Ajax missile silos had one tank to supply oil for the hydraulic powered lift that conveyed the Nike Ajax missiles to the surface. In 2002, these tanks were drained and the access points welded shut, rendering them unusable. Water samples collected from the silos in 2001 did not contain PCBs (CH2M Hill, 2007).

#### 4.5. ASBESTOS

There is presumed asbestos-containing material (PACM) in the following buildings: Administrative Building, OMS, and potable well pump house.

The Administrative Building contains PACM in good condition in the following areas: non-friable 12" beige floor tile with brown and white marbling/mastic in the main entry E-001 and halls H-100 and H-101, non-friable black coving/mastic throughout the building, non-friable dark brown door caulking Rooms 100A, 102A, 107, entry E-001 hall H-102 and around exterior side of building entry doors, friable ceiling tiles with grooves and pinholes in rooms 100, 103, 104, 105, 108, 109, 110, 204, 205, 208, 209, 212, 213, 214, 215, 216, 217, entries E-001, E-002 halls H-101, H-102, H-200, stairways S-001, S-003 and S-004, non-friable tan carpet mastic in room 100, non-friable green coving/mastic in room 100, friable sheetrock/joint compound in rooms 100 and 103, non-friable white window caulking in room 100, non-friable red vent duct mastic in room 100B, non-friable gray door caulking in rooms 100B, 101A, 101B, 102, 102A, 104, 105, 108, 109, 110, 112, 113, 114, 200, 201, 203, 204, 205, 208, 209, 210, 212, 213, 215, 216, 217, 218, entry E-002, halls H-100, H-101, H-102, H-103, H-200, stairways S-001, S-003 and S-004, non-friable plaster in rooms 101A, 101B, 112, 113, 114, 200, 201, 203, 210 and stairways S-001, S-002, S-003 and S-004, friable ceiling tiles with few pin holes in rooms 101, 103, 104, 105, 108, 109, 121, 204, 205, 208, 209, 213, 214, 215, 216, 217, 218, E-002, halls H-102, H-200 and stairway S-002, non-friable tan wall mastic in room 102 and hall H-103, non-friable vault door in room 102, non-friable 12" light gray floor tile with gray and white marbling/mastic in rooms 103, 104, 105, 108, 109, 110, 204, 205, 208, 209, 213, 214, 215, 216, 217 and 218, non-friable transite wall panels in rooms 103, 104, 105, 108, 109, 110, 204, 205, 208, 209, 213, 214, 215, 216, 217 and 218, and non-friable 12" beige floor tile with brown marbling/mastic in room 212, entry E-002 & halls H 102 and H-200.

The OMS contains PACM in good condition in the following areas: non-friable 12" beige floor tile with brown and white marbling/mastic in room 103, non-friable black coving/mastic in room 103, non-friable dark brown door caulking on exterior side of entry doors, friable sheetrock/joint compound in room 103, non-friable red vent duct mastic in room 100, friable gray door caulking in rooms 100, 101, 102, and 103, and non-friable white window glazing in room 100, non-friable white coving/mastic in room 103.

The Pump House contains PACM in good condition in the following areas: non-friable gray door caulking around interior and exterior sides of all doors.

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the transferee assumes responsibility for abatement or management of any ACM in accordance with applicable federal, state, and local requirements] OR [the buildings are scheduled for demolition and no occupation of the buildings will be permitted prior to demolition. The deed will include an asbestos warning and covenant (Enclosure 8). See *Asbestos Visual Inspection Report, July 2012* for additional information (Enclosure 9).

#### **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; specifically the 2004 LBP Inspection Report (ALSI, 2004) for additional information. The property was not used for residential purposes. The transferee intends 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. See Lead Abatement Project Monitoring, (Industrial Hygiene Consultants, 1994), located in Appendix D of the 2007 ECP Report for additional information.

Any remaining lead-based paint or lead-contaminated dust that has not been removed or abated will not present an unacceptable risk to human health, because prior to converting the Property to residential use, as defined by 24 CFR 35, the transferee assumes responsibility for abatement and management of lead-based paint and lead dust hazards in accordance with applicable federal, state, and local requirements. The deed will include a lead-based paint warning and covenant (Enclosure 8).

#### **4.7. RADIOLOGICAL MATERIALS**

The following buildings were used for radiological activities: Administration Building. Radiological equipment included compasses, night vision goggles, and nuclear, biological, and/or chemical (NBC) detection and calibration equipment. The USAR Center previously operated as a Nike Ajax missile launch facility. Based on the 2003 document *Final Report Nike Missile Battery, Environmental Conditions Assessment Guide* (USACE, 2003), Nike Ajax missile bases did not contain nuclear warheads. There is no evidence of any release of radiological materials at this Property (Enclosure 6). All radioactive materials have been removed from the property. The Army completed a Radiological Site Assessment of the Property in compliance with the accepted federal government protocol (MARSSIM Class 3). The Radiological Site Assessment Report found no evidence to suggest that any radiological commodities were improperly managed at the site or that any residual radiological material is present at the site and concluded that no further action is required. On June 15, 2012, the Office of the Assistant Chief of Staff for Installation Management concluded the site is free of radiological concerns.

#### **4.8. RADON**

A radon survey was conducted in 2004 at the OMS building, Administration Building and Pump House building. Radon was not detected at above the EPA residential action level of 4 picocuries per liter (pCi/L) in these buildings. 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. The USAR Center previously operated as a Nike Ajax missile launch facility. All Nike Ajax missile components, including warheads, have been removed from the Property. See Section 6.9 of the 2007 ECP Report for additional information. As a USAR Center, the property was used exclusively 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**

The following other potentially hazardous conditions exist on adjacent properties: A CERCLA Superfund site (Transicoil/North Penn—Area 12) is located approximately 0.67 miles west-northwest and upgradient of the Property. The presence of these hazards on adjacent property does not present an unacceptable risk to human health and the environment, because the U.S. Environmental Protection Agency (EPA) has determined the remedy (groundwater extraction and treatment, long term monitoring, and extending the existing public water supply to the Property) is in place, operating properly, and currently protective of human health and the environment. The analytical results from the Property’s water supply well in 1997 suggest that implementation of this remedy has reduced concentrations of VOCs and metals below the action levels established by USEPA. For additional information, visit the EPA’s website for the Transicoil/North Penn—Area 12 superfund site at: <http://www.epa.gov/reg3hwmd/super/sites/PAD057152365/index.htm>.

#### **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 7).

#### **7. REGULATORY/PUBLIC COORDINATION**

The U.S. EPA Region 3, the Pennsylvania Department of Environmental Protection (PADEP), 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 will be 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 Environmental Assessment, *BRAC 05 Recommendations for Closure of the North Penn Memorial United State Army Reserve Center, Norristown, PA, April, 2011*. There were no encumbrances or condition 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.

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Tom Lederle  
Deputy, ACSIM-ODB

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DATE

### **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 - Radiological Memo
- Encl 7 - Access Provision and Other Deed Provisions
- Encl 8 - Environmental Protection Provisions
- Encl 9 - Asbestos Inspection
- Encl 10 - Regulatory/Public Comments and Army Response



## ENCLOSURE 2

### ENVIRONMENTAL DOCUMENTATION

<b>Document</b>	<b>Source</b>
Environmental Condition of Property Report, North Penn U.S. Army Reserve Center (PA139), 1625 Berks Road, Norristown, PA, CH2M Hill, April 2007	USACE
Environmental Condition of Property Update Report, North Penn U.S. Army Reserve Center (PA139), 1625 Berks Road, Norristown, PA, XCEL Engineering, March 2012	USACE
Finding of No Significant Impact for BRAC 05 Recommendations for Closure of the North Penn Memorial United State Army Reserve Center, Norristown, PA, April, 2011	99 <sup>th</sup> RSC
Trip Report Summary, August 2009	99 <sup>th</sup> RSC
Final Phase II Environmental Condition of Property in Support of Base Realignment and Closure of North Penn Memorial USAR Center (PA139), Worchester Township, Montgomery County, PA, July 2011	99 <sup>th</sup> RSC
UST Closure Report, 1,000-Gallon and 20,000-Gallon USTs, July 2011	99 <sup>th</sup> RSC
Memo, Radiological Survey, June 2012	99 <sup>th</sup> RSC
Asbestos Visual Inspection Report, July 2012	99 <sup>th</sup> RSC
Environmental Condition of Property Recertification, September 2012	99 <sup>th</sup> RSC

## ENCLOSURE 3

### TABLE 1 – DESCRIPTION OF PROPERTY

Building Number and/or Property Description	Condition Category	Remedial Actions
The entire Parcel including all buildings. A description of sites is provided below.	3	There were multiple remediation/investigation sites located on the Property. All environmental soil and groundwater remediation/investigation activities on the property have been completed or are in place and operating properly and successfully. Refer to Section 6.0 and 7.0 of the 2011 ECP Update Report for additional information.
Site 01 - Fence Line Assessment		Complete. PADEP staff collected 20 soil samples along fence line in 2000 as part of a CMSA Pilot Study. No exceedances of PADEP Act 2 standards were found. AOC resolved on February 5, 2001. Refer to CMSA Pilot Study, 2000 for additional information.
Site 03 - Nike Site Area		Complete. Former Missile Silo Area and Missile Silo Handling Area was sampled during a subsurface investigation dated June 2001. No exceedances of PADEP Act 2 standards were identified. Refer to CH2M Hill Report titled " <i>Document Review and Limited Site Investigation Report for the North Penn, Edgemont, and Bristol Veterans Facilities</i> , dated June 2001 for additional information.
Site 07 - FTA Burn Area		Complete. FTA Burn Area investigated during Phase II ECP dated July 2011. No exceedances of PADEP Act 2 standards. Refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.
Characterization of groundwater		Complete. VOCs and metals above PADEP standards were detected in the on-site potable well during sampling in 1993 and 1994. On-site potable well was re-sampled in 1996 and again in 1997 with no VOCs present. Lead and copper were detected; however, they were below the action levels established by USEPA. The VOCs and metals

Building Number and/or Property Description	Condition Category	Remedial Actions
	3	detected in 1993 and 1994 were attributed to the Transicoil/North Penn—Area 12 CERCLA Superfund site. The analytical results from the USAR Center’s water supply well in 1997 suggest that remedial measures performed at the Transicoil/North Penn—Area 12 site have effectively reduced concentrations of VOCs and metals in the offsite groundwater plume (CH2M Hill, 2007). Soil sample results from July 2011 Phase II ECP do not suggest the presence of groundwater contamination. Refer to Section 2.6 of the 2007 ECP Report. Also refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.
Drainage Ditch - Oil-like substance or sheen, which was reportedly flowing from sewer outfall and within the drainage ditch		Complete. Storm Drainage Ditch Area investigated during Phase II ECP dated July 2011. No exceedances of PADEP Act 2 standards. Refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.
Former Spoils Area - reportedly associated with the sewage treatment plant upgrade		Complete. Area of Concern was sampled during a subsurface investigation dated June 2001. No exceedances of PADEP Act 2 standards were identified. Refer to <i>Document Review and Limited Site Investigation Report for the North Penn, Edgemont, and Bristol Veterans Facilities</i> , dated June 2001 for additional information.
Site 04 – Fuel Oil AST. Also referred to as “250-gallon heating oil AST, east side of well pump house”		Complete. Tank no longer present at the Site. No staining in vicinity of former tank location. PADEP concurrence for no further action during site visit, July 2009. Refer to Trip Report Summary dated August 2009 for additional information.
250-gallon Waste Oil AST, West Side of OMS		Complete. Tank no longer present at the Site. No staining in vicinity of former tank location. PADEP concurrence for no further action during site visit,

Building Number and/or Property Description	Condition Category	Remedial Actions
	3	July 2009. Refer to Trip Report Summary dated August 2009.
Site 05 -Fuel Oil UST (Site 05); also referred to as "1,500-gallon heating oil UST, northwest side of OMS"		Complete. UST and contaminated soil removed October 30, 1990. No Further Action granted by PADEP in letter dated March 25, 1991 (Appendix D). AOC resolved per PADEP on January 30, 2002. Refer to NFA letter dated March 25, 1991.
Site 08 - OMS Service Pit Closure		Complete. Pit encased in cement within OMS. Received PADEP concurrence for no further action during site visit, July 2009. Refer to Trip Report Summary dated August 2009.
Former 1,000-gallon unleaded gasoline UST, East of OMS		Complete. The 2007 ECP reported this tank was on the PADEP Tank Incident List in "inactive" status. The UST was removed July 1996. The site was investigated during Phase II ECP. No exceedances of PADEP Act 2 standards. Refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.
Former 20,000-gallon heating oil UST, east side of administration building		Complete. UST and contaminated soil removed in 1995. Area of former 20,000-gallon heating oil UST investigated during Phase II ECP dated July 2011. No exceedances of PADEP Act 2 standards. Refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.
Former 5,000-gallon diesel UST between MEP and POV parking areas		Complete. UST removed in 1995. Area of former 5,000-gallon diesel UST investigated during the Phase II ECP dated July 2011. No exceedances of PADEP Act 2 Standards. Received PADEP concurrence for No Further Action.

<b>Building Number and/or Property Description</b>	<b>Condition Category</b>	<b>Remedial Actions</b>
Three 100-Pound Propane ASTs	3	Complete. Propane cylinders removed
Three Hydraulic oil ASTs, one inside each missile silo		Complete. Tanks decommissioned in 2002 by removing fluids, welding shut the access points, rendering tanks unusable.
500-gallon heating oil AST, West side of fire protection pump house		Complete. Tank removed. No indication of a petroleum release from this site.
Two Fuel Oil ASTs, Inside fire protection pump house		Complete. Tanks removed. No indication of a petroleum release from this site.

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.

**ENCLOSURE 4**

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

<b>Building Number and/or Area</b>	<b>Name of Hazardous Substance(s)</b>	<b>Date of Storage, Release, or Disposal</b>	<b>Investigative/Remedial Actions</b>
Characterization of groundwater	VOCs, Metals	1954 to 1968 as NIKE Missile Site; 1968 to 2011 as USAR Center	Complete. VOCs and metals above PADEP standards were detected in the on-site potable well during sampling in 1993 and 1994. On-site potable well was re-sampled in 1996 and again in 1997 with no VOCs present. Lead and copper were detected; however, they were below the action levels established by USEPA. The VOCs and metals detected in 1993 and 1994 were attributed to the Transicoil/North Penn—Area 12 CERCLA Superfund site. The analytical results from the USAR Center’s water supply well in 1997 suggest that remedial measures performed at the Transicoil/North Penn—Area 12 site have effectively reduced concentrations of VOCs and metals on the Property (CH2M Hill, 2007). Soil sample results from July 2011 Phase II ECP do not suggest the presence of groundwater contamination. Refer to Section 2.6 of the 2007 ECP Report. Also refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.

\* 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 substances CERCLA reportable quantity. See 40 CFR Part 373.

**ENCLOSURE 5**

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

<b>Building Number/Area</b>	<b>Name of Petroleum Product(s)</b>	<b>Date of Storage, Release, or Disposal</b>	<b>Investigative/Remedial Actions</b>
Site 04 – Fuel Oil AST. Also referred to as “250-gallon heating oil AST, east side of well pump house”	Fuel Oil	1954 to 1968 as NIKE Missile Site; 1968 to 2011 as USAR Center	Complete. Historical documents indicate that No. 2 heating oil was spilled around the AST, most likely from overfilling. No staining is visible in the vicinity of the former tank’s location. PADEP concurred for no further action during site visit, July 2009. Refer to Trip Report Summary dated August 2009 for additional information.
250-gallon Waste Oil AST, West Side of OMS	Waste Oil	1954 to 1968 as NIKE Missile Site; 1968 to 2011 as USAR Center	Complete. Tank no longer present at the Site. No staining in vicinity of former tank location. PADEP concurrence for no further action during site visit, July 2009. Refer to Trip Report Summary dated August 2009.
Site 05 -Fuel Oil UST (Site 05); also referred to as “1,500-gallon heating oil UST, northwest side of OMS”	Heating Oil	1954 - 1990	Complete. UST and contaminated soil removed October 30, 1990. No Further Action granted by PADEP in letter dated March 25, 1991 (Appendix D). AOC resolved per PADEP on January 30, 2002. Refer to NFA letter dated March 25, 1991.
Site 08 - OMS Service Pit Closure	None	1954 to 1968 as NIKE Missile Site; 1968 to 2011 as USAR Center.	Complete. Pit encased in cement within OMS. Received PADEP concurrence for no further action during site visit, July 2009. Refer to Trip Report Summary dated August 2009.

Building Number/Area	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Investigative/Remedial Actions
Former 1,000-gallon unleaded gasoline UST	Gasoline	1954 - 1996	Complete. The 2007 ECP reported this tank was on the PADEP Tank Incident List in "inactive" status. The UST was removed July 1996. The site was investigated during Phase II ECP. No exceedances of PADEP Act 2 standards. Refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.
Former 20,000-gallon heating oil UST	Heating Oil	1954 - 1995	Complete. UST and contaminated soil removed in 1995. Area of former 20,000-gallon heating oil UST investigated during Phase II ECP dated July 2011. No exceedances of PADEP Act 2 standards. Refer to <i>Phase II Environmental Condition of Property in Support of Base Realignment and Closure for North Penn Memorial U.S. Army Reserve Center (PA139), Worchester Township, Montgomery County, Pennsylvania</i> , dated July 2011 for additional information.
Three 100-Pound Propane ASTs	Propane	Not reported	Complete. Propane cylinders removed
Three hydraulic oil ASTs, one inside each missile silo	Hydraulic Oil	1954 - 2002	Complete. Tanks decommissioned in 2002 by removing fluids, welding shut the access points, rendering tanks unusable.
500-gallon heating oil AST, West side of fire protection pump house	Heating Oil	~1954 - Unknown	Complete. Tank removed. No indication of a petroleum release from this site.

<b>Building Number/Area</b>	<b>Name of Petroleum Product(s)</b>	<b>Date of Storage, Release, or Disposal</b>	<b>Investigative/Remedial Actions</b>
Two Fuel Oil ASTs, Inside fire protection pump house	Fuel Oil	~1954 - Unknown	Complete. Tanks removed. No indication of a petroleum release from this site.
Former 5,000-gallon diesel UST between MEP and POV parking areas	Diesel	1954 - 1995	Complete. UST removed in 1995. Area of former 5,000-gallon diesel UST investigated during the Phase II ECP dated July 2011. No exceedances of PADEP Act 2 Standards. Received PADEP concurrence for No Further Action.

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**ENCLOSURE 6**  
**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

15 June 2012

MEMORANDUM FOR RECORD

SUBJECT: Results from the Radiological Survey at the North Penn U.S. Army Reserve Center (USARC) in Norristown, Pennsylvania

1. On 15 June 2012, the final survey work for the radiological release at the North Penn 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](mailto:hans.b.honerlah@usace.army.mil).

Encl

A handwritten signature in cursive script that reads "Thomas E. Lederle".

Thomas E. Lederle  
Deputy Chief, ACSIM  
BRAC Division

## ENCLOSURE 7

### 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 North Penn USAR 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. 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.

#### **C. 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, its 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**

a. The Environmental Protection Provisions are at Enclosure 8, 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.

DRAFT

## ENCLOSURE 8

### 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 buildings on the Property have been determined to contain friable asbestos: Administration building and OMS. 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 Army's 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. 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 therefor.

**ENCLOSURE 9**  
**ASBESTOS INSPECTION**

DRAFT

# **ASBESTOS VISUAL INSPECTION REPORT**



**99<sup>TH</sup> REGIONAL SUPPORT COMMAND  
UNITED STATES ARMY RESERVE  
FORT DIX, NEW JERSEY**

## **NORTH PENN US ARMY RESERVE CENTER**

**NORRISTOWN, PENNSYLVANIA**

**(USAR FACID: PA139 - SITE CODE: 42823)**

July 2012

# ASBESTOS VISUAL INSPECTION REPORT



**NORTH PENN US ARMY RESERVE CENTER  
(PA0139) - (42823)  
1625 BERKS ROAD  
NORRISTOWN, PENNSYLVANIA,**

Prepared By



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

Submitted to



United States Army Corps of Engineers  
Savannah District

Prepared for



**99<sup>TH</sup> REGIONAL SUPPORT COMMAND  
UNITED STATES ARMY RESERVE  
FORT DIX, NEW JERSEY**

# North Penn US Army Reserve Center – Norristown, PA

## ASBESTOS INSPECTION REPORT

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### 1. SUMMARY:

Asbestos Building Inspector from the Small Business Group (SBG) of Ladson, SC conducted a visual inspection to identify suspect asbestos containing material (ACM) located at the North Penn US Army Reserve Center located at 1625 Berks Road in Norristown, PA. The inspection was conducted on July 18, 2012 utilizing modified Asbestos Hazard Emergency Response Act (AHERA) guidelines. The results of the inspections provide an inventory of assumed suspect ACM in the buildings at this site. No sampling was conducted during this visual inspection.

The Inspector is certified by an EPA accredited training center under AHERA guidelines as a Building Inspector and licensed as required by the state of Pennsylvania. A copy of the inspector's license is located in the back of this report.

### 2. FINDINGS:

Nineteen suspect materials were identified in the four structures located at this site. The structures are listed below. The assumed ACM located at this site is listed in the Summary Table as Appendix A. Appendix B contains drawings showing the floor plan of each building containing suspect materials.

### 3. STRUCTURES:

- Building 1: Main Administrative Building is an approximately 45,000 square foot concrete block structure with brick exterior and flat EDPM (rubber coated) roofing, constructed in 1974.
- Building 2: Maintenance Shop is an approximately 6,800 square foot concrete block structure with brick exterior and flat EDPM (rubber coated) roofing, constructed in 1974.
- Building 3: Pump House # is an approximately 700 square foot concrete block structure a flat EDPM (rubber coated) roofing, constructed in 1974.
- Building 4: Pump House #2 is an approximately 250 square foot wood-framed structure with vinyl siding exterior and non-suspect roofing, probably constructed in 1980s.

### 4. OBSERVATIONS:

A 1994 report by Herman Associates of a partial sampling procedure reported boiler insulation in the Boiler Room of the Main Building (Building 1) was ACM. All ACM identified in that report has been removed. Building 4 did not contain any suspect materials, therefore no drawing is included in the report.

# North Penn US Army Reserve Center – Norristown, PA

## ASBESTOS INSPECTION REPORT

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Building room numbers were either assigned by the inspector during the inspection or taken from actual rooms and are shown on the attached drawing (Appendix B). A thorough and diligent inspection was conducted of this structure but some unidentified or inaccessible materials may still be present (i.e. wall voids, pipe chases, etc.). If previously unidentified suspect materials are found during renovation/demolition activities, samples should be taken to verify asbestos content prior to disturbance. Material quantities in this report are estimated and should be verified prior to any abatement activities.

### 5. SITE BUILDING PHOTOS:



**Building 1: Main Admin Building**



**Building 2: Maintenance Shop**



**Building 3: Pump House #1**



**Building 4: Pump House #2**

## MATERIAL SUMMARY TABLE

### Building 1 - Main Administrative Building

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
1	12" beige floor tile w/brown & white marbling/mastic	NF	1,310 SF	Good	Moderate	Main entry E-001 & Halls H-100 & H-101	Assumed ACM
2	Black covering/mastic	NF	2,300 LF	Good	Moderate	Throughout the building	Assumed ACM
3	Dark brown door caulking	NF	70 LF	Good	Moderate	Rooms 100A, 102A, 107, Entry E-001 Hall H-102 and around exterior side of building entry doors	Assumed ACM
4	Ceiling tiles w/grooves & pinholes	F	9,110 SF	Good	Moderate	Rooms 100, 103, 104, 105, 108, 109, 110, 204, 205, 208, 209, 212, 213, 214, 215, 216, 217, Entries E-001, E-002 Halls H-101, H-102, H-200, Stairways S-001, S-003 & S-004	Assumed ACM
5	Tan carpet mastic	NF	200 SF	Good	Low	Room 100	Assumed ACM
6	Green covering/mastic	NF	25 LF	Good	Moderate	Room 100	Assumed ACM
7	Sheetrock/joint compound	F	575 LF	Good	High	Rooms 100 & 103	Assumed ACM
8	White window caulking	NF	16 LF	Good	Moderate	Room 100	Assumed ACM
9	Red vent duct mastic	NF	16 SF	Good	Low	Room 100B	Assumed ACM
10	Gray door caulking	NF	5,085 LF	Good	Moderate	Rooms 100B, 101A, 101B, 102, 102A, 104, 105, 108, 109, 110, 112, 113, 114, 200, 201, 203, 204, 205, 208, 209, 210, 212, 213, 215, 216, 217, 218, Entry E-002, Halls H-100, H-101, H-102, H-103, H-200, Stairways S-001, S-003 & S-004	Assumed ACM

## MATERIAL SUMMARY TABLE

### Building 1 - Main Administrative Building (Cont.)

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
11	Plaster	NF	2,040 SF	Good	Moderate	Rooms 101A, 101B, 112, 113, 114, 200, 201, 203, 210 & Stairways S-001, S-002, S-003 & S-004	Assumed ACM
12	Ceiling tiles w/few pinholes	F	9,150 LF	Good	Moderate	Rooms 101, 103, 104, 105, 108, 109, 121, 204, 205, 208, 209, 213, 214, 215, 216, 217, 218, E-002, Halls H-102, H-200 & Stairway S-002	Assumed ACM
13	Tan wall mastic	NF	5 SF	Good	Moderate	Room 102 & Hall H-103	Assumed ACM
14	Vault door	NF	1 each	Good	Low	Room 102	Assumed ACM
15	12" light gray floor tile w/gray & white marbling/mastic	NF	60 LF	Good	Moderate	Rooms 103, 104, 105, 108, 109, 110, 204, 205, 208, 209, 213, 214, 215, 216, 217 & 218	Assumed ACM
16	Transite wall panels	NF	1,050 SF	Good	High	Rooms 103, 104, 109, 110, 214 & 217	Assumed ACM
17	12" beige floor tile w/brown marbling/mastic	NF	3,045 SF	Good	Low	Room 212, Entry E-002 & Halls H-102 & H-200	Assumed ACM

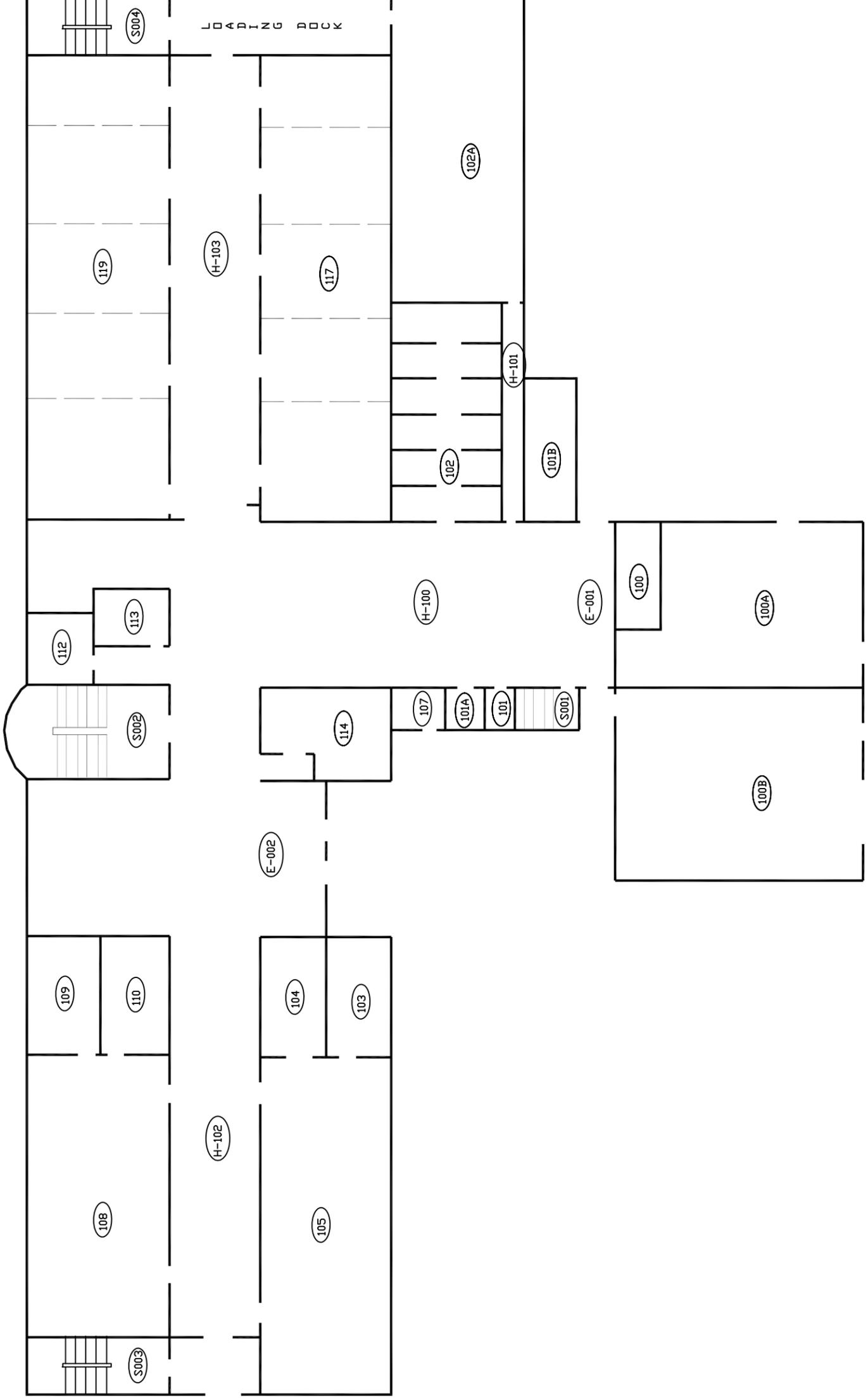
## MATERIAL SUMMARY TABLE

### Building 2 - Maintenance Shop

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
1	12" beige floor tile w/brown & white marbling/mastic	NF	175 SF	Good	High	Room 103	Assumed ACM
2	Black coving/mastic	NF	60 LF	Good	Moderate	Room 103	Assumed ACM
3	Dark brown door caulking	NF	52 LF	Good	Moderate	Exterior side of entry doors	Assumed ACM
7	Sheetrock/joint compound	F	45 LF	Good	High	Room 103	Assumed ACM
9	Red vent duct mastic	NF	11 SF	Good	Moderate	Room 100	Assumed ACM
10	Gray door caulking	NF	205 LF	Good	Moderate	Rooms 100, 101, 102, 103,	Assumed ACM
18	White window glazing	NF	820 LF	Good	Moderate	Room 100	Assumed ACM
19	White coving/mastic	NF	5 LF	Good	Moderate	Room 103	Assumed ACM

### Building 3 - Pump House #1

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
10	Gray door caulking	NF	205 LF	Good	Moderate	Around interior & exterior sides of all doors	Assumed ACM



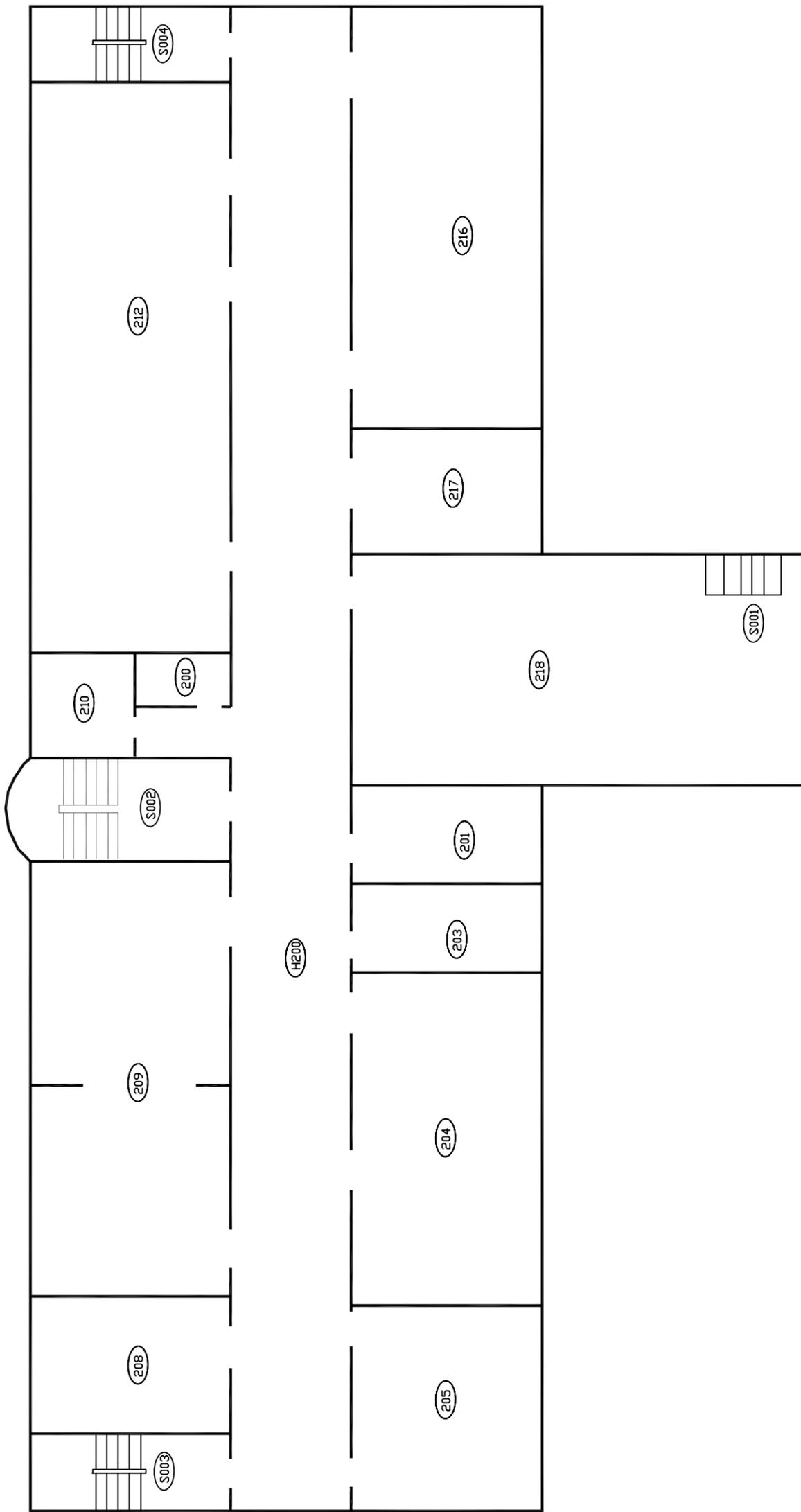
**LEGEND**

(XXX) — Indicates unique room number assigned by inspector

**SBG-EEG**  
 7301 RIVERS AVE., SUITE 245  
 N. CHARLESTON SC 29406-4643  
 (843) 573-7140

APPENDIX B  
 ASBESTOS SAMPLE LOCATIONS  
 BUILDING 1, FIRST FLOOR  
 ARC NORTH PENN  
 NORTH PENN, PENNSYLVANIA

DATE	AUG 2012	PREPARED BY	M. MOLTZEN	DRAWN BY	L. C. DIASIO	REV	-
SCALE	NONE	DWG NUMBER	SBG_NPPA-B1FL1_07-2012	SHEET	1	OF	5



LEGEND

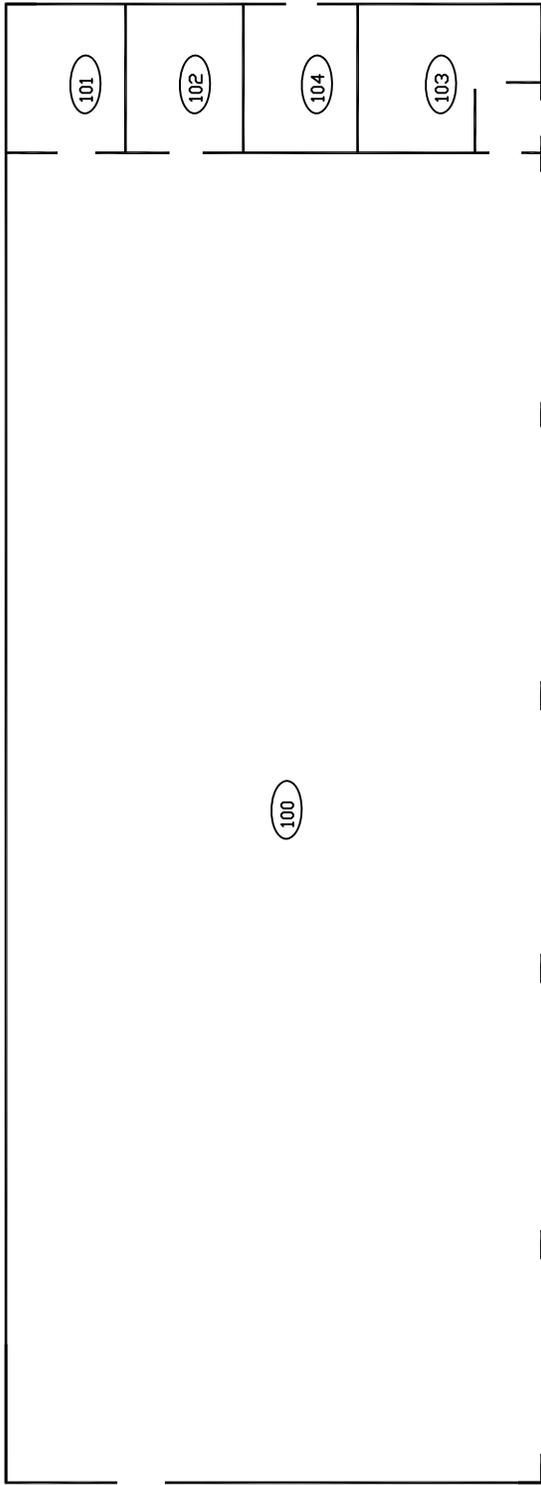
(XXX) — Indicates unique room number assigned by inspector

**SBG-EEG**

7301 RIVERS AVE., SUITE 245  
 N. CHARLESTON SC 29406-4643  
 (843) 573-7140

APPENDIX B  
 ASBESTOS SAMPLE LOCATIONS  
 BUILDING 1, SECOND FLOOR  
 ARC NORTH PENN  
 NORTH PENN, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
AUG 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	NONE	DWG NUMBER	SHEET
		SBG_NPPA-B1FL2_07-2012	2 OF 5



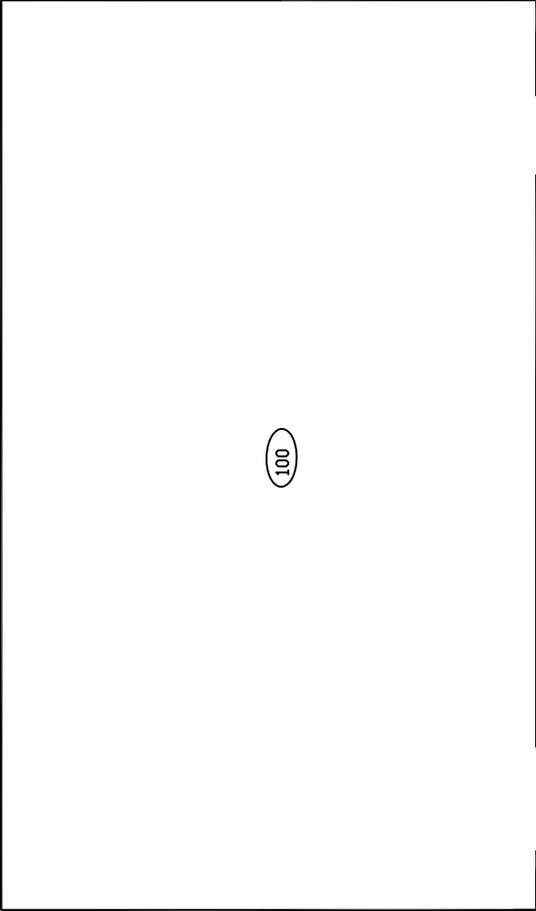
LEGEND

(XXX) — Indicates unique room number assigned by inspector

**SBG-EEG**  
 7301 RIVERS AVE., SUITE 245  
 N. CHARLESTON SC 29406-4643  
 (843) 573-7140

APPENDIX B  
 ASBESTOS SAMPLE LOCATIONS  
 BUILDING 2  
 ARC NORTH PENN  
 NORTH PENN, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
JULY 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER		SHEET
NONE	SBG_NPPA-B2_07-2012		3 OF 5



100

LEGEND

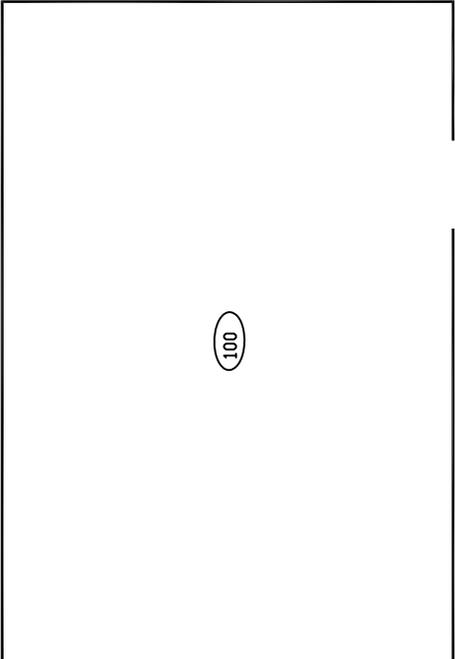
ⓧ — Indicates unique room number assigned by inspector

***SBG-EEG***

7301 RIVERS AVE., SUITE 245  
N. CHARLESTON SC 29406-4643  
(843) 573-7140

APPENDIX B  
ASBESTOS SAMPLE LOCATIONS  
BUILDING 3 - PUMP HOUSE 1  
ARC NORTH PENN  
NORTH PENN, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
JULY 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER		SHEET
NONE	SBG_NPPA-PH1_07-2012		4 OF 5



LEGEND

— Indicates unique room number assigned by inspector



**SBG-EEG**

7301 RIVERS AVE., SUITE 245  
 N. CHARLESTON SC 29406-4643  
 (843) 573-7140

APPENDIX B  
 ASBESTOS SAMPLE LOCATIONS  
 BUILDING 4 - PUMP HOUSE 2  
 ARC NORTH PENN  
 NORTH PENN, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
JULY 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER		SHEET
NONE	SBG_NPPA-PH2_07-2012		5 OF 5

**STATE ASBESTOS INSPECTOR LICENSE**

**PENNSYLVANIA ASBESTOS CERTIFICATION**

**048996**

	Sex: M	Height: 5'09"	Eyes: BLU	Birth Date: 12/18/1953
	Expires: 02/08/2013	Issue Date: 03/09/2012		
	Class: INSPECTOR			
	MARK MOLTZEN 337 MUIRFIELD PKWY CHARLESTON SC 29414			

*Mark Moltzen*

Background text: BERKSHIRE, BUTTE, CAMDEN, CHESTER, CLAY, COCOSHEUS, COLUMBIA, CRAWFORD, DELAWARE, FRANKLIN, GALLUP, GREENE, HUNTERDON, JEFFERSON, JERSEY, LANCASTER, LEHIGH, MERCER, MONTGOMERY, NORTHAMPTON, PHILADELPHIA, PITTSBURGH, SCHUYLKER, SHERBURNE, SULLY, TOWNSHIP, UNION, WASHINGTON, WILKES, WILKESBARRE, WYOMING, YORK

## ENCLOSURE 10

### REGULATORY/PUBLIC COMMENTS & ARMY RESPONSE

Will be updated after public comment.

- 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 PADEP on DATE.
- The Draft FOST was sent to US EPA on \_\_\_\_\_.
- Army Response.