

FINAL

**ENVIRONMENTAL CONDITION OF
PROPERTY REPORT**

**LEROY R. POND
U.S. ARMY RESERVE CENTER (AR010)
1616 NORTH WOOLSEY AVENUE
FAYETTEVILLE, ARKANSAS 72703**

Prepared For:

**U.S. Army Corps of Engineers — Louisville District
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600 Dr. Martin Luther King, Jr. Place
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February 2, 2007

CERTIFICATION

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

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

DATE

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



LENARD GUNNELL, P.G.
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February 2, 2007
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EXECUTIVE SUMMARY

The Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers, Louisville District, has prepared this Environmental Condition of Property (ECP) Report for the Leroy R. Pond U.S. Army Reserve (USAR) Center (Facility ID AR010), hereafter referred to as the "Site" or "USAR Center." The Site is located at 1616 North Woolsey Avenue in Fayetteville, Washington County, Arkansas.

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

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

The USAR Center encompasses approximately 3.5 acres of land with three permanent structures, a 14,921-square-foot Building 1, a 5,200-square-foot Building 2, and a 4,137-square-foot organizational maintenance shop (OMS). Building 1 includes administration areas, an assembly area, and a warehouse. Building 2 includes offices and an ammunition storage vault. The site is currently occupied by the 362nd Psychological Operations Company, 332nd Chemical Company Biodetection Unit, and 489th Combat Engineers Support.

Based on a review of historical street maps, aerial photographs, and U.S. Geological Survey topographical maps dating back to 1936, the Site was undeveloped until the USAR began constructing buildings in 1958. The U.S. government purchased the Site in 1932. Building 1 and the OMS were constructed in 1958, and Building 2 was constructed in 2003.

Areas of potential environmental concern were reviewed and the TEJV found no significant concerns relating to environmental condition of the Site. In accordance with DoD policy defining the classifications (see S.W. Goodman Memorandum dated October 21, 1996), the Site has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

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List of Acronyms and Abbreviations

ACM	asbestos-containing material
ADEQ	Arkansas Department of Environmental Quality
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
BRRM	Base Redevelopment and Realignment Manual
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	CERCLA Information System
CESQG	conditionally exempt small-quantity generator
CFR	Code of Federal Regulations
CORRACTS	Corrective Action Sites
DoD	Department of Defense
EBS	Environmental Baseline Survey
ECCI	Environmental, Compliance & Construction, Inc.
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
ERNS	Emergency Response Notification System
FEMA	Federal Emergency Management Agency
hazmat	hazardous materials
kg	kilogram
LBP	lead-based paint
LQG	large-quantity generator
LUST	leaking underground storage tank
MEP	military equipment parking
NFRAP	No Further Remedial Action Planned
NPL	National Priorities List
NRCS	Natural Resources Conservation Service
OMS	organizational maintenance shop
OWS	oil-water separator

PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
PMT	pole-mounted transformer
POL	petroleum, oil, and lubricants
POTW	Publicly Owned Treatment Works
POV	privately owned vehicle
ppm	parts per million
PWS	Public Water Supply
RCRA	Resource Conservation and Recovery Act
RQ	reportable quantity
RRC	Regional Readiness Command
SPCC	Spill Prevention, Control and Countermeasure
SQG	small-quantity generator
TCA	1,1,1-trichloroethane
TEJV	Terraine-EnSafe Joint Venture
TSD	treatment, storage, and disposal
USACE	U.S. Army Corps of Engineers
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USAR	U.S. Army Reserve
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
UST	underground storage tank
VA	Veterans Administration
VCP	Voluntary Cleanup Program
VWR	vehicle wash rack

1.0 INTRODUCTION

The Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers (USACE) Louisville District, was authorized to prepare an Environmental Condition of Property (ECP) Report for the Leroy R. Pond U.S. Army Reserve (USAR) Center (Facility ID AR010), in response to the Base Realignment and Closure Act (BRAC) 2005 legislation. The work was performed under Contract No. W912QR-04-D-0044, Delivery Order No. 0008. The facility located at 1616 North Woolsey Avenue, in Fayetteville, Washington County, Arkansas, is hereafter referred to as the "Site" or "USAR Center." In support of the ECP, a visual reconnaissance of the Site was conducted on August 14, 2006. The purpose of the reconnaissance was to visually obtain information indicating the likelihood of recognized environmental conditions in connection with the Site.

1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY

The Military Department with real property accountability shall assess, determine and document the environmental condition of all transferable property in an ECP Report. This ECP Report is based on readily available information. Pursuant to the Department of Defense's (DoD's) policy, set forth in the Base Redevelopment and Realignment Manual (DoD 4165.66-M, March 1, 2006) Section C8.3 (BRRM), the primary purposes of the ECP Report include the following:

- Provide the Army with information it may use to make disposal decisions.
- Provide the public with information relative to the environmental condition of the property.
- Assist in community planning for the reuse of BRAC property.
- Assist Federal agencies during the property screening process.
- Provide information for prospective buyers.
- Assist prospective new owners in meeting the requirements under U.S. Environmental Protection Agency's (USEPA) "All Appropriate Inquiry" regulations.
- Provide information about completed remedial and corrective actions at the property.
- Assist in determining appropriate responsibilities, asset valuation, and liabilities with other parties to a transaction.

The ECP Report contains the information required to comply with the provisions of 40 Code of Federal Regulations (CFR) Part 373, which require that a notice accompany contracts for the sale of, and deeds entered into, for the transfer of federal property on which any hazardous substance was stored, released or disposed of. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 120(h) stipulates that a notice is required if certain quantities of designated hazardous substances have been stored on the property for one year or more — specifically, quantities exceeding 1,000 kilograms (kg) or the reportable quantity (RQ), whichever is greater, of the substances specified in 40 CFR 302.4 or one kg of acutely hazardous waste as defined in 40 CFR 261.30. A notice is also required if hazardous substances have been disposed of or released on the property in an amount greater than or equal to the RQ. Army Regulation 200-1 requires that the ECP Report address asbestos, lead-based paint (LBP), radon and other substances potentially hazardous to human health.

This ECP Report used the American Society for Testing and Materials (ASTM) Designation D 6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys* as a guideline when not inconsistent with the BRRM, CERCLA § 120, Army regulations and other applicable Army guidance.

1.2 SCOPE OF SERVICES

This ECP covers the approximately 3.5-acre USAR Center at 1616 North Woolsey Avenue in Fayetteville, Arkansas. The property is bounded by the wooded grounds of a city park to the north and east; North Woolsey Avenue and residential properties to the west; and a Veterans Administration (VA) Hospital complex to the south. A general Site location map, Site maps, historical street maps, historical topographic maps and aerial photographs, a zoning map, a wetlands map, and a Federal Emergency Management Agency (FEMA) floodplain map are provided in Appendix A. Appendix B provides photographs taken during the August 2006 Site reconnaissance. Appendix C provides chain-of-title information for the Site. Historical environmental documents and reports are provided in Appendix D. The environmental database report is provided in Appendix E.

This ECP Report classifies the property into one of seven DoD Environmental ECP categories as defined by the S.W. Goodman Memorandum dated October 21, 1996. The property classification categories are as follows:

- Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
- Category 2: Areas where only release or disposal of petroleum products has occurred.

- Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.
- Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.
- Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.
- Category 6: Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
- Category 7: Areas that are not evaluated or require additional evaluation.

1.3 ASSUMPTIONS AND LIMITATIONS

This report was prepared to permit formulation of an opinion of the environmental condition of the Site. Opinions on the environmental conditions at the Site are based on information from the visual reconnaissance, interviews, and collection and review of readily available information. New information or changes in Site use could require a review and possible modification of the findings and conclusions contained in this report.

The information obtained from the USAR, the USAR's representatives, individuals interviewed, and prior environmental reports was considered to be accurate unless reasonable inquiries indicated otherwise. Conditions observed were considered representative of areas that were not accessible unless otherwise indicated.

This ECP Report presents a summary of readily available information on the environmental conditions of, and concerns relative to, the land, facilities, and real property assets at the USAR Center. Its findings are based on a record search of readily available documents, a thorough review of the applicable and relevant documents, a visual Site reconnaissance conducted on August 14, 2006, and interviews with personnel knowledgeable about the Site and its history. Extensive environmental investigations and reports and Site historical documents were reviewed in support of this ECP. Information obtained from these other studies is reflected within this report by reference. A complete list of references is provided as Section 9.0.

All Site buildings were visually inspected during the Site reconnaissance. However, a 100% visual reconnaissance of each building (e.g., attics, crawl spaces, etc.) was not practical due to accessibility limitations. Some offices and the interiors of some portable storage containers were locked and inaccessible during the Site reconnaissance.

Inaccessible office areas are assumed to be similar to those that were open and visually observed by TEJV. No sampling or analysis of any media was conducted during this survey.

2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

The visual Site reconnaissance included a driving tour of the facility and the surrounding area, and a walking assessment of the developed area of the Site and buildings. The visual reconnaissance was conducted by TEJV personnel on August 14, 2006 to field-verify information produced in the document review and to identify recognized environmental conditions of property. All roads on the Site accessible by two-wheel drive vehicle were driven during the reconnaissance.

A reconnaissance of the Site perimeter was conducted to evaluate adjacent property uses that could contribute to any environmental contamination detected on the Site. TEJV personnel walked the Site perimeter and drove on roads in the surrounding area to visually identify any contiguous properties that appear, in TEJV's professional judgment, to have contamination that could migrate to the Site. The findings of the perimeter survey are presented in Section 4.0.

2.1 SITE LOCATION

The Site address is 1616 North Woolsey Avenue in Fayetteville, Washington County, Arkansas. As shown on Figure 1 in Appendix A, the Site is in a developed area approximately 1,200 feet west of U.S. Highway 71 Business, which is also known as North College Avenue. The Arkansas and Missouri Railroad is approximately 1,500 feet to the west, and the University of Arkansas, Fayetteville Campus, is approximately 1 mile southwest. The Site is north of a VA Hospital complex and east of a residential area. Gregory Park, a wooded city park, is north and east of the Site.

2.2 ASSET INFORMATION

Facility Name and Address:	Leroy R. Pond USAR Center 1616 North Woolsey Avenue Fayetteville, Arkansas, 72703
Property Owner:	U. S. Government.
Buildings Owner:	90 th Regional Readiness Command (RRC)
Date of Ownership:	June 20, 1932
Current Occupants:	362 nd Psychological Operations Company, 332 nd Chemical Company Biodetection Unit, and 489 th Combat Engineers Support.
Zoning:	P-1, Institutional District. The P-1, Institutional Zoning District is designed to protect and facilitate use of property owned by larger public institutions and church-related organizations.

County, State: Washington County, Arkansas

USGS Quadrangle: 36094-A2 Fayetteville, Arkansas

Section/Township/Range: Section 9, Township 16 North, Range 30 West

Latitude/Longitude: 36° 5' 0.6" N; 94° 9' 39.6"

Legal Description: Being that parcel or tract of land, situated and lying in the Northeast ¼ of Section 9, Township 16 North, Range 30 West in the City of Fayetteville, Washington County, State of Arkansas.

2.3 PHYSICAL DESCRIPTION

A Site map of the USAR Center is provided as Figure 2 in Appendix A. The USAR Center is on approximately 3.5 acres of land with three permanent structures: Building 1, which includes administration and assembly/warehouse areas; Building 2, which is used by the 332nd Chemical Company Biodetection Unit; and the organizational maintenance shop (OMS). Floor plans for each of the buildings are provided as Figures 3 through 5 in Appendix A. Photographs of the Site and adjacent properties and specific environmental conditions or other Site-specific features are in Appendix B.

Building 1, constructed in 1958, has two connected wings or sections. The west wing, the Administration portion of the building, is one story and rectangular, with offices on either side of a central hallway, classroom space, a mechanical room and a computer supply room. The mechanical room houses a boiler, a chiller, and has four floor drains. The east wing encloses the Assembly area (Drill Hall) on the south and a two-story warehouse on the north. The 40-foot by 80-foot warehouse, added to Building 1 in 2001, is used to store clothing and equipment that are issued to soldiers. The connection between the east and west portions of Building 1 contains a hallway, a kitchen, and a tool storage room. Building 1 was constructed with concrete slab flooring, cinder block walls with a brick veneer, and a rubber membrane roof for all portions of the building except the warehouse, which has a metal roof. Building 1 houses the 362nd Psychological Operations Company and 489th Combat Engineers.

Building 2 was constructed in 2003 with a concrete slab floor, cinder block walls, and a metal roof. Inside the one story building are offices and an ammunition storage vault. This building is occupied by 332nd Chemical Company Biodetection Unit.

The OMS building was constructed in 1958 and has undergone several modifications, most recently in 2003 with additions on the east and west sides for office and storage space. This one story building has two garage bays with offices and storage spaces on the east and west sides of the bays. It is used for vehicle maintenance and for calibration and servicing of the chemical and biological detection unit's electronic instrumentation. The

calibration and servicing of the biological detection equipment is performed by an outside contractor, AAI Services. The OMS has two flammable material cabinets for storing lubricants and a parts washer. The parts washer contains a small amount of water and soap, and is serviced by USAR personnel that work in the OMS.

In addition to the three buildings, the Site also contains a privately owned vehicle (POV) parking lot south of Buildings 1 and 2, and a fenced military equipment parking (MEP) area north of the OMS. Military vehicles and portable storage units are in the MEP area. A vehicle wash rack (VWR) with an oil-water separator (OWS) is northwest of the OMS. A gazebo is north of Building 2. South of the OMS is a paved area with two hazardous materials (hazmat) storage cabinets, portable storage units, a caged storage shed for pressurized gas cylinders, and a Dumpster. One of the hazmat storage units contained a 55-gallon drum of oil, a 55-gallon drum of antifreeze, and smaller containers of lubricants, oils, and cleaners. The other hazmat storage unit contained tools and equipment and one 5-gallon container of gasoline. USAR personnel opened most of the portable storage units for viewing of the contents. The units contained tools, equipment, and other items of a non-chemical nature. One unit had an empty flammable materials storage cabinet, some unused spill kits, and oil-dry on the floor from a bag which had broken open.

Approximately 85% of the Site is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.). A strip of lawn and trees lines North Woolsey Avenue on the west side of the Site. A strip of lawn and then wooded land are on the north side of the Site. The wooded land on the north side is immediately adjacent to and contiguous with wooded parkland to the north, so that the boundary between the two parcels is not readily identifiable. Vehicle access is from an entrance on North Woolsey Avenue. No signs of erosion, excavation, or fill were observed on the Site.

The 362nd Psychological Operations Company, the 332nd Chemical Company Biodetection Unit, and the 489th Combat Engineers Support use the facility for offices, physical and academic training, storage of equipment, maintenance/repair of military vehicles, and conducting drill training activities.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Appendix A provides a topographic map (Figure 1) of the Site and surrounding area. As shown on the map, the Site is approximately 1,445 feet above mean sea level and slopes downward to the north. Storm water runoff on the south side of the Site flows into grated storm drains and curb inlets, and then northward toward Gregory Park. Storm water runoff in the southeast corner of the Site flows into a grated drain that is connected to the sanitary sewer, according to USAR personnel. Storm water runoff on the north side of the Site flows overland to the north, toward Gregory Park. The storm water draining from the park eventually flows into Scull Creek, approximately one-half mile northwest of the Site. No surface water bodies are on the Site or adjacent areas. Review of the topographic map

of the Site area indicates that the nearest surface water bodies are Scull Creek approximately one-half mile to the northwest of the Site, and Lake Lucille, approximately one-half mile to the southeast of the Site.

According to the FEMA Flood Insurance Rate Map for the City of Fayetteville, Arkansas (Community Panel Number 050216 0084 C, September 18, 1991), the Site is in "Zone X." Zone X is defined by FEMA as "Areas of moderate to minimal hazard subject to flooding from severe storm activity or local drainage problems." The Site is outside the 100-year and 500-year flood zones.

2.4.2 Hydrogeological Characteristics

The Site is on the northern edge of the Boston Mountains in an area that prior to development was steep, stony mountainside covered with hardwoods, underlain by acidic sandstone, siltstone, and shale or by alluvium derived from these rocks. Based on the soil survey obtained from the U. S. Department of Agriculture Natural Resources Conservation Service (NRCS), the predominant soil types on the Site are:

- Fayetteville fine sandy loam, 3 to 8% slopes, eroded. This is a deep, well-drained moderately permeable red soil derived from the residuum of massive soft calcareous sandstone that occurs on hilltops. Depth to bedrock is typically 4 to 8 feet.
- Enders-Allegheny complex, 8 to 20% slopes, is a soil that formed on mountainsides primarily from acid shale interbedded with a small amount of siltstone. The subsurface contains more clay than the Fayetteville fine sandy loam.

Neither of the soils identified on the Site is listed as hydric by the NRCS.

The Site is in the Boston Mountains Section of the Ozark Plateaus Province. Sedimentary rocks that underlie the Boston Mountains Section are sandstones and shale of Pennsylvanian age deposited in deltaic, marine, coastal and swampy environments.

The Site is underlain by the Ozark Plateaus aquifer system, a thick sequence of flat-lying to southward dipping limestone, dolomite, and sandstone with some shale and chert. Three regional aquifers are separated by two confining units. The most superficial aquifer is the Springfield Plateau aquifer, comprised of limestone and chert. This aquifer yields only small volumes of water primarily used for watering livestock. The Ozark aquifer, which is separated from the Springfield Plateau aquifer by the Chattanooga shale of the Ozark confining unit, is the thickest, most extensive, and most productive aquifer in the region. It is 2,000 to 4,000 feet thick in the Fayetteville area, and is comprised of limestone, dolomite, and sandstone. Below the Ozark aquifer is the St. Francois confining unit, comprised of shale and dolomite, and then the St. Francois aquifer, which is not used for groundwater production.

No wells or springs were observed on the Site. The Site and surrounding area are served with public water by the City of Fayetteville, which uses surface water from Beaver Lake as its water supply source. A database search was conducted for federal U. S. Geological Survey (USGS) wells, federal Public Water Supply (PWS) System wells, and state-registered wells within 1 mile of the Site (see page A-6 in the Environmental Data Resources, Inc. [EDR] Report in Appendix E). No wells were identified on databases for properties within 1 mile of the Site.

2.5 SITE UTILITIES

The facility's water, sanitary sewer service, and solid waste disposal service are provided by the City of Fayetteville. The facility has no storm water permits or industrial sewer use agreement with the City. Solid waste is placed in a Dumpster on the southern property boundary at the southeastern edge of the parking area, and picked up by the City. The Site recycles fluorescent tubes and paper, which are collected by the City of Fayetteville as well.

This Site does not have a separate sewer system for industrial wastewater. The only process water generated is from the OWS at the VWR, which discharges into the sanitary sewer. One grated storm drain on the southeastern side of the Site reportedly discharges into the sanitary sewer, not the storm water system. During the Site reconnaissance, layouts of the Site's piping system were reviewed to evaluate the discharge point and piping connections for this drain. The diagrams did not show the piping from the grated inlet but suggest that the sanitary sewer connection is a strong possibility, based on the proximity of sewer lines to the grated inlet. USAR personnel indicated that the grated inlet was previously used to collect runoff from a grease rack formerly in the southeast corner of the Site and/or from a former VWR that may have been in that location. Storm water from other portions of the Site flows into grated or curbed storm drains in the parking lot on the south side of the property, or overland toward Gregory Park from areas on the north side of the property.

Electricity is provided by Southwestern Electric Power Company, a division of American Electric Power. Natural gas for comfort heating purposes is supplied to the facility by Arkansas Western Gas Company. The facility has two heating systems: a hot water circulation system with a natural gas boiler to heat the water, and natural gas-fired strip heaters in the warehouse portion of Buildings 1 and 2.

2.6 WATER SUPPLY WELLS AND SEPTIC SYSTEMS

As described in Section 2.4.2, there are no PWS System wells within 1 mile of the Site. Because the Site is served by a public sanitary sewer system, there are no septic systems on the Site, and no known systems were identified in the area.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

The *Historical Chain-of-Title Report* for the Site, in Appendix C, was reviewed. Property ownership information for the Site was researched at the Washington County Tax Assessor's Office. A copy of the property record card provided by that office is in Appendix D.

The property record indicates that the approximately 3.5-acre Site is part of an 18.6-acre parcel that includes a portion of the VA Hospital complex. According to the Washington County Tax Assessor's Office record and USAR personnel, the 18.6-acre parcel containing the Site property originally was a 38-acre tract of land that included the area which is now Gregory Park. Key historical deed transfers within the last 60 years are as follows:

- January 2, 1964 — A quitclaim deed was signed by the Administrator of Veterans Affairs giving 19.4 acres of the parcel to the City of Fayetteville for use as a park.
- January 1, 1985 — The 19.4 acres was deeded by warranty deed to the City of Fayetteville by U.S. Hospital

The parcel now used by the City of Fayetteville as a park is listed in the Washington County records as parcel 765-13902-001, and the 18.6 acres occupied by the VA Hospital and the Leroy R. Pond USAR Center is parcel 765-13902-000.

The chain-of-title report did not identify any leases or environmental liens against the USAR Center property.

3.2 PAST USES AND OPERATIONS

According to USAR personnel, the VA provided the property to the USAR to construct the Leroy R. Pond USAR Center. According to the historical topographic maps reviewed, the approximately 3.5-acre Site was undeveloped prior to development of the USAR Center. In 1958, the main building and attached assembly hall were constructed; those buildings were dedicated in 1959, according to USAR personnel.

Important events in the facility's development, administration, and mission are summarized in Table 1.

Table 1 Historical Summary of Leroy R. Pond USAR Center	
Year	Description
1958	Construction of Building 1 and the OMS building.
1959	Dedication of the buildings. Site occupied by a USAR truck ordnance unit for a few years.
Early 1960s	Site occupied by 306 th Civil Affairs.
1960 — 1974	Sometime during these years, a VWR and an OWS were installed at the Site.
1978	306 th Civil Affairs deactivated. 362 nd Psychological Operations Company occupied the Site.
Late 1970s	Vehicle inspection pit for oil changes in the OMS was filled.
1979	Western wall of the OMS was extended to create space for offices and a battery room.
1984	489 th Combat Engineers Support occupied the Site.
1987	Building 1 windows were replaced.
1988 — 1989	Current VWR was installed and OWS modified.
1993	Waste oil storage structure and oxygen/acetylene storage cage constructed.
1995 — 1996	Boiler was re-piped and boiler insulation replaced.
1997	Horizontal heat exchanger installed.
1998 — 1999	Grease rack by maintenance shop removed.
2001	Construction of the warehouse portion of Building 1.
2003	Construction of Building 2.
2003	Modifications to OMS building.
2004	332 nd Chemical Company Biodetection Unit occupied Building 2.

According to USAR personnel, the Building 1 Drill Hall originally had a kitchen in its southeast corner. A printing press was once in the northwest corner; the press was later moved into a van that was kept parked on the grounds. The van also contained a dark room for developing photographs. The tool storage room in the connection between the east and west wings was once an arms vault. Some of the Building 1 mechanical equipment was replaced in the 1990s, and re-piping occurred in conjunction with installation of the new equipment. Replacement of a chiller unit required construction of a concrete pad outside the mechanical room; the old pad remains as broken concrete.

The OMS building has undergone several modifications since its original construction in 1958. The most recent modification was in 2003, when office space was added to the east and west sides of the building. According to USAR personnel, the USAR truck ordnance unit that occupied the Site initially used the OMS for vehicle repair activities. The building continues to be used for vehicle repair and maintenance operations through the present day. Currently, vehicle repair activities are conducted in the OMS building by six to seven full-time personnel and, since 2004, calibration and maintenance of instruments used by the 332nd Chemical and Biological Detection Unit is also performed in the OMS building.

When first constructed, the OMS had a pit to facilitate vehicle inspection and oil changes. The pit was filled with concrete in the late 1970s and a grease rack constructed outside, south of the OMS. The grease rack was not used often and was removed. Currently,

used oil generated from vehicle maintenance at the OMS is drummed and shipped offsite. A VWR was constructed after 1960 but before 1974; USAR personnel were not sure of the original VWR's location, but said it could have been south of the OMS or where the current VWR is located. The current VWR was constructed in 1988 or 1989.

USAR personnel stated the Site has not had an operational indoor firing range.

Historical street maps, topographic maps, and aerial photographs provide information about the Site and surrounding area. Figures 6, 7, 8, and 9 in Appendix A present Fayetteville street maps for the Site and surrounding area dated 1936, 1958, 1960, and 1967, respectively. Figures 10, 11, and 12 present historical topographic maps dated 1958, 1976, and 1982, respectively. Figures 13 through 16 present aerial photographs of the Site and surrounding areas dated 1972, 1980, 1986, and 1994, respectively.

Pertinent observations on the historical street maps are summarized below.

- **1936 through 1960 (Figures 6 through 8).** These maps show the VA Hospital on a parcel of land that extends between North Woolsey Avenue on the west and North College Avenue on the east, to Sycamore Street on the north. The Site is within the Fayetteville city limits. No buildings are shown that would correspond to the Site structures.
- **1967 (Figure 9).** In this figure, the VA Hospital parcel does not extend to Sycamore Street. A park is shown to the north of the hospital property.

Pertinent observations on the USGS topographic maps are summarized below.

- **1958 (Figure 10).** This figure depicts the Site as undeveloped land adjacent to the VA Hospital roads and buildings. Buildings and roads are present in the Site area. No features are shown on the Site.
- **1976 and 1982 (Figures 11 and 12).** In these figures, two structures are depicted on the Site: a rectangular building that corresponds to the shape and location of the west wing of Building 1, and a square building that may represent the east wing of Building 1. The OMS building may be on the maps but obscured by lettering (the labeling for the VA Hospital). On the 1976 map, "Sycamore Park" is labeled just south of Sycamore Street, north of the Site.

Pertinent observations on the historical aerial photographs are summarized below.

- **1972, 1980, 1986, and 1994 (Figures 13 through 16).** Both wings of Building 1, the OMS, and associated parking areas are visible on these figures. Building 1 does not include the warehouse portion on the north of the east wing. The wooded land of Gregory Park is north and east of the Site, and the VA Hospital circular drive and

buildings are clearly visible to the south of the Site. Residential property is to the west of the Site and also further north, across Sycamore Street. The photographs document the consistency of the Site structures and surrounding property features throughout the years from 1972 through 1994.

Available business directories including *Polk's City Directory* and *Cole Criss-Cross Directory* were reviewed by EDR. EDR's research spanned five-year intervals between 1965 through 2005. In addition, TEJV reviewed available Polk's city directories dated 1904 through 1965 at the Fayetteville Public Library. The Site address was not listed for any years prior to 1961. For 1961 and later years, the Site address is listed as occupied by either "USA Reserve Center" or "US Department of Army."

City directories for 1904, 1920-1921, and 1927-1928 do not list North Woolsey Avenue. The 1929-1930 city directory contains the first North Woolsey listing, with nine residences on the street. The North Woolsey addresses for subsequent years continue to be residential listings.

Gregory Park is not listed in the city directories for any years reviewed. Other Sycamore Street listings are not in the directories until 1951; the Sycamore Street listings for this year and subsequent years are residential.

The VA Hospital is first listed in the 1932-1933 city directory at 1141 North College Avenue. In subsequent years, the VA Hospital is listed randomly at 1141, 1121, 1201, and 1100 North College Avenue (1100 is its current address). Other North College Avenue listings from the 900 through 1200 block are primarily commercial for all years since the 1930s.

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

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

Information related to the past use and storage of hazardous substances at the Site was compiled through review of available Site records, search of federal and state environmental databases, and interviews with USAR personnel.

3.3.1 Past Use and Storage of Hazardous Substances

Chemicals formerly used and stored at the Site were associated primarily with vehicle and facility maintenance activities and janitorial services. Janitorial chemicals and building maintenance-related products were stored in the designated storage area within the janitorial closet in Building 1. Petroleum, oil, and lubricant (POL) storage and use are associated with the OMS. The OMS had oil stains on the floors of the garage bays, some of which had been freshly treated with an oil-dry absorbent. The stains were *de minimis*, based on their size and because they were on concrete with no apparent conduit to the subsurface.

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

USAR personnel stated that they had once operated a printing press and a dark room at the Site. The printing press was initially in the northwest corner of the Drill Hall in the east wing of Building 1. Later, the press was moved to a van which also contained the darkroom. The van was typically parked in the parking lot on the Site. The press was operated by Standard Register, a local company, and was moved offsite in 1987. Small quantities of ink, printing solvents, and photographic developing solutions would have been stored on the Site or in the van for operation of the printing press and dark room. No staining was observed on the concrete floor of the Drill Hall where the printing press previously operated. The van was mobile and no specific location in the parking lot was identified by the Site contact as the van parking space.

A questionnaire, completed in 1993 for an environmental review of the Site, identified the following hazmat and hazardous substances used or stored at the Site at that time:

- photographic solvents
- fluorescent bulbs
- automotive batteries
- compressed gases (oxygen and acetylene)
- chemical agent resistant paint
- antifreeze
- batteries
- oil and grease absorbent
- fuel (diesel, heating oil, gasoline)
- hydraulic fluid
- lubricant
- motor oil
- paint thinner
- latex-based paint
- paint primer
- camouflage stick face paint
- pesticides
- equipment cleaner and degreaser solvent
- 1,1,1-trichloroethane (TCA) solvent
- toner
- WD-40
- printing inks and solvents

A waste oil storage building and a caged shed for oxygen and acetylene cylinder storage were on the Site, south of the OMS, in 1993, according to USAR personnel. The waste oil storage building was removed from the Site in 1994. Two hazmat cabinets placed in the southeast corner of the Site in 2004 are still in use. The cylinder storage shed also remains on the Site.

Hazmat observed during the Site reconnaissance included: two cylinders of chlorodifluoromethane, one cylinder of Genetron 22, one gallon of Brite Aluminum Fin/Coil Cleaner and Brightener, and oil and paint in containers of 1 gallon or less in the Building 1 mechanical room; cleaners in containers of 1 gallon or less in the Building 1 janitor's closet; oil and lubricants in containers of 1 gallon or less in a flammable materials cabinet in the OMS; and oil and antifreeze in drums in the hazmat storage units near the OMS. Stains were noted on the concrete floor of the Building 1 mechanical room and on the concrete/asphalt area around the hazmat storage units near the OMS.

3.3.2 Past Disposal and Release of Hazardous Substances

Information related to past disposal and potential release of hazardous substances at the Site was compiled through review of available Site records, search of federal and state environmental databases, and interviews with USAR personnel. According to USAR personnel and Site records, the disposal of hazardous materials or hazardous wastes has not occurred at the Site. No spills have been reported at the Site.

An architectural assessment report, discussed in Section 3.5.2, contained a map of the Site dated June 6, 1989, entitled Waste Site Locations. The waste site locations shown on the map include the Building 1 maintenance room; the VWR north of the OMS building; a POL storage room in the northeast corner of the OMS building; and a drum storage shed and grease rack in the southeast corner of the Site. During the Site reconnaissance, multiple stains were noted on the Building 1 maintenance room floor and on the floor in the OMS building, including near the POL storage room. No stains were observed at the VWR or by the drum storage shed and grease rack in the southeast corner of the Site.

The 1993 questionnaire listed the following hazardous wastes generated at the Site in 1992:

- photographic solvents
- liquid paint
- paint stripper/thinner
- pesticides
- Nuclear, Biological, and Chemical filters and test kits
- de-icing solution
- printing ink and solvents
- absorbent materials and soil contaminated with hazardous waste
- batteries

USAR personnel did not know the method of disposal for chemical wastes that would have been generated by the printing press and dark room operations, but said they were small operations and the wastes generated would have been correspondingly small. The wastes from the former operations would have included paper, solvent rags, and containers of solvent waste. USAR personnel additionally stated that Standard Register, the local company that operated the press, may have disposed of the wastes offsite as part of the company's wastes.

According to USAR personnel and records, the Site is currently a Resource Conservation and Recovery Act (RCRA) conditionally exempt small quantity generator (CESQG) of hazardous waste, that is, one that generates less than 100 kg of hazardous waste or 1 kg of acutely hazardous waste in a calendar month. Site records indicate that hazardous waste was generated through 1995. USAR personnel stated that there was an extensive cleanup of stored chemicals and hazardous materials at the Site in 1994 which included hazardous wastes; the cleanup was associated with removal of the waste storage shed near the OMS. In a letter dated June 13, 1996, the USAR requested that the state of Arkansas change the status of the Site from small quantity generator (SQG) to non-generating. The state of Arkansas replied in a letter dated June 28, 1996, that the status was changed to "non-handler."

USAR personnel stated that current waste streams include used oil and antifreeze, and that approximately three 55-gallon drums are generated per year.

No stained soil or stressed vegetation was observed during the Site reconnaissance. The POV parking area had a few small stains that appeared to be from leaking vehicles. The MEP parking area had multiple small stains from vehicle oil leaks. During the Site reconnaissance, many of the vehicles parked in the MEP lot had containers under them to catch drips. The mechanical room had marks and staining on the floor that appeared to be from equipment and water. The OMS had oil stains on the floors of the garage bays, some of which had been freshly treated with an oil-dry absorbent. The stains on the mechanical room and OMS floor were considered *de minimis*, based on their size and because they were on concrete with no conduits to the subsurface. No noxious or foul odors were noted.

Current waste generation at the Site primarily consists of office trash and used oil from the OMS. Management of the wastes appeared good. Documentation of past disposal of waste generated from site activities was not available.

3.4 PAST BULK PETROLEUM STORAGE TANKS

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

3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

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

3.5.1 Environmental Baseline Survey Report

Environmental, Compliance & Construction, Inc. (ECCI) issued an *Environmental Baseline Survey* (EBS) for the USAR Center in May 2005. The EBS provides summary and general information about the Site. "In accordance with the ASTM Standard D 5746-98 for *Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities*," ECCI classified the Site as an ECP Area Type 1 Property. An ECP Area Type 1 Property is an area or parcel of real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred, including no migration of these substances from adjacent properties.

3.5.2 Architectural Assessment Report

Parsons Engineering Science, Inc. performed a *Historic Architectural Resources Assessment of the 90th Regional Support Command Facilities in Arkansas* for the Department of the Army. The findings of the assessment were compiled in a report issued February 1998. The report concluded that the buildings on the Site were not eligible for placement on the National Register of Historic Places because they did not meet the 50-year age criteria and they did not appear to possess exceptional historical importance. No further architectural surveys were recommended for this Site until 2009. The Arkansas State Historic Preservation Officer concurred with the report recommendations in a letter dated August 25, 1997. The Architectural Assessment Report contained a map dated June 6, 1989, that showed the layout of the facility and waste storage locations. The map is included in Appendix D.

3.5.3 Cultural Resources Management Summary

Parsons Engineering Science, Inc. prepared a *Management Summary, Cultural Resources Assessment of 90th Regional Support Command Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas* for the Department of the Army. The February 1998 report summarized the findings of the architectural and archaeological assessments that had been performed by Parsons. The summary confirmed the information provided in the Architectural Assessment Report for the USAR Center and provided information from an archaeological assessment of the Site (the archaeological assessment was not provided for TEJV review). The cultural resources summary listed the USAR Center as "low" in archaeological potential.

3.5.4 Asbestos Reports

An *Asbestos Building Survey* report dated January 1997 was prepared for the USAR Center by the U.S. Army 90th Regional Support Command (now the 90th RRC). The report detailed the findings of an asbestos-containing materials (ACM) inspection and sampling event. None of the 11 samples collected were ACM (defined as materials containing more than 1% asbestos by weight).

A memo dated March 26, 1993, for the Directorate of Environmental Quality, concerning the status of asbestos at USAR Centers in Oklahoma and Arkansas stated: "Fayetteville — this facility is not asbestos free. Some insulation remains in the crawl space between two ceilings that was inaccessible at the time of abatement. There is also a small amount of floor tile which contains asbestos under the partitions in the men's and women's restrooms." The 1997 asbestos survey conducted after the 1993 memo was prepared did not indicate that those locations were sampled.

3.5.5 Polychlorinated Biphenyls Report

The U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) performed a *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97*. The assessment, compiled and issued on September 30, 1997, addressed three pole-mounted transformers (PMTs) on the west side of the Site and one PMT at the northwest corner of the Site. The PMTs were listed as owned by Southwestern Electric Power Company. The three PMTs on the west side of the Site were manufactured by Allis-Chalmers in 1966, and the PMT on the northwest corner was manufactured by Central Malone in 1978. Within the USACHPPM assessment report, the PCB status of each of the four transformers is listed as "Non-PCB," followed by a concentration. The concentration listed for one of the Allis-Chalmers PMTs is 6 parts per million (ppm) PCBs and, for each of the others, 5 ppm PCBs. The Central Malone PMT is listed as containing less than 1 ppm PCBs. The condition of each of the PMTs in 1997 was described as good, with no leaks.

A letter dated April 22, 1993, from the Southwestern Electric Power Company to the environmental compliance coordinator at the USAR Center lists the PMTs and their PCB content, as detailed in the PCB assessment.

3.5.6 Oil-Water Separator Evaluation

EnSafe Inc. performed an evaluation and issued an *Oil-Water Separator Evaluation* for the 90th RRC on May 5, 2000. The report stated that an OWS on the USAR Center was installed to service an adjacent VWR that has a canopy and curbing/speed reducers along the perimeter to reduce storm water infiltration. The report stated that the VWR had been used only occasionally during the year (1999) before the inspection.

EnSafe described the OWS as a concrete, three-chamber, rectangular vessel with a capacity of approximately 450 gallons. Two wooden baffles divided the OWS into an inlet chamber, a separation chamber, and an outlet chamber. The OWS received

wash and rinse water from the VWR and discharged effluent to the city of Fayetteville sanitary sewer system. The report stated that the city of Fayetteville Pretreatment Ordinance prohibits the following discharges:

- Pollutants that create a fire or explosive hazard in the publicly owned treatment works (POTW) including, but not limited to, waste streams with a closed-cup flashpoint below 140 degrees Fahrenheit.
- Wastewater with a pH less than 5.0 or more than 12.5.
- Solid or viscous substances including, but not limited to, animal or vegetable fats, oil, or grease in amounts that would obstruct the flow of the POTW.
- Wastewater having a temperature greater than 150 degrees Fahrenheit.
- Petroleum oil, non-biodegradable cutting oil, or mineral oil products in amounts that would interfere with or cause pass through.
- Storm water, surface water, groundwater, artesian well water, roof runoff, subsurface drainage, condensate, deionized water, etc., unless specifically authorized by the Control Authority.
- Sludges, screening, or other residues from the pretreatment of industrial wastes.
- Concentrations of selected metals in excess of specific limits.

No permit, monitoring, or reporting to the POTW was required.

At the time of EnSafe's 2000 inspection, the OWS chambers each contained approximately 6 inches of sludge and 2.5 feet of liquid. EnSafe's report recommended removing sediment from the wash rack discharge sump; establishing a schedule for routine sludge, oil, and sediment removal; inspecting the OWS annually; and developing a site-specific written program that describes procedures and management practices to ensure compliance with the Clean Water Act.

USAR personnel stated that the OWS was cleaned out in 2002. The sludge and liquid content of the chambers were not gauged during the Site reconnaissance. USAR personnel stated that the VWR and OWS are no longer used.

3.5.7 Environmental Compliance Assessment PreSite Visit Checklists, 1993 and 1999

Site records included questionnaires apparently completed in 1993 and in 1999 in preparation for environmental compliance assessments by the 90th RRC. The 1993 questionnaire contained checklists for hazardous substances stored and

hazardous wastes generated at the Site, as discussed in Sections 3.3.1 and 3.3.2. The 1999 checklist indicated that no hazardous wastes were generated at the Site at that time.

3.5.8 Lead-Based Paint and Ozone Depleting Chemicals Inspection Report

Site records included a report of a LBP and ozone-depleting chemical survey conducted at the Site by ETC Engineers, Inc. (excerpt provided in Appendix D). LBP was identified in four locations: two exterior doors at the main entrance to Building 1, a third exterior door on Building 1, and a garage door. Report documents included diagrams of sampled areas but no diagram specifically identifying the locations of the positive LBP samples.

3.5.9 Spill Prevention, Control and Countermeasures Plan

A Spill Prevention, Control and Countermeasures (SPCC) plan was developed for the Site and was reviewed by TEJV along with other Site records. USAR personnel stated that the SPCC plan is no longer a required document because this Site does not meet the storage threshold for oil. The SPCC was written in 1996 as a plan for action in the event of a release of oil. Typically a SPCC plan is prepared because more than 1,320 gallons of petroleum product is stored on a property, but the SPCC did not state the quantity of material stored on the Site. The plan described the storm water flow direction as toward Gregory Park, but stated that the drain by the hazmat storage area discharges to the sanitary sewer.

3.5.10 Radioactive Materials

A memo dated November 1, 1999, identified the location and types of radiation detecting and emitting devices stored at the Site before the Building 1 warehouse addition was constructed. The storage locations were the unit supply room in the northwest corner of the administration section of Building 1, and the caged area on the northwest side of the Building 1 assembly area. The types of equipment stored were compasses, chemical alarms, radiac chargers and detectors, and dosimeters.

3.5.11 Radon

The May 2005 EBS stated that a radon survey was performed at the Site in November 1998 by the USAR. The report stated that levels greater than 4.0 picocuries per liter (pCi/L) were not measured during the survey. A copy of the Site radon survey was not available for review during preparation of this report.

4.0 ADJACENT PROPERTIES

Figure 17 in Appendix A provides an aerial view of the Site and adjacent properties. The Site is bounded by North Woolsey Avenue and residential properties to the west; the VA hospital complex to the south; and the wooded grounds of Gregory Park to the east and north. Further north, beyond Gregory Park, is West Sycamore Street, then residential properties. Further east are commercial properties along U. S. Highway 71 Business. To the south, beyond the VA Hospital complex, is North Street, which is lined with commercial properties.

Table 2 provides a list of adjacent properties with their directional location from the Site. The zoning of the adjacent parcels is also listed in Table 2. The Site and adjacent properties to the north, east, and south are zoned P-1, Institutional Zoning District. This zoning designation is “designed to protect and facilitate use of property owned by larger public institutions and church related organizations,” according to the Fayetteville Web site (www.accessFayetteville.org).

Direction From Site	Name/Type of Property	Address	Zoning
West	Single-family residential property	1600 block of North Woolsey Avenue	RSF-4, Residential Single Family
South	Veterans Administration Hospital complex	1100 North College Avenue	P-1, Institutional Zoning District
East and North	Gregory Park, wooded land	69 East Sycamore Street	P-1, Institutional Zoning District

Appendix A provides historical aerial photographs and topographic maps and Appendix E presents an environmental data report that was used to evaluate potential environmental impacts from adjacent and nearby properties that may have also impacted the environmental conditions at the Site. The VA Hospital facility was listed in the environmental database search report as a leaking UST (LUST) facility, as discussed in Section 5.2.2.

Land use at properties adjacent to the Site does not appear to have changed significantly over the years. None of the adjacent properties appears to have impacted the environmental conditions of the USAR Center.

5.0 REVIEW OF REGULATORY INFORMATION

A component of the ECP is the review of all reasonably obtainable federal, state, and local government records for the Site and surrounding properties where there has been a release or likely release of any hazardous substance or any petroleum product and that are likely to cause or contribute to a release or threatened release of any hazardous substance or any petroleum product on the federal real property. An environmental database summary was obtained from EDR on July 20, 2006. The environmental database summary consolidates standard federal, state, local, and tribal environmental record sources based on ASTM-recommended minimum search distances from the Site. A copy of the complete EDR report is included in Appendix E.

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

TEJV interviewed local authorities and reviewed reasonably accessible USAR environmental documents, Arkansas Department of Environmental Quality (ADEQ) files, and historical aerial photographs and maps to investigate environmental conditions at the Site and surrounding Area. Available information on potential impacts to the Site was assessed.

TEJV conducted an interview with USAR personnel to discuss general environmental interest and specific areas of interest identified during the records review and visual reconnaissance. A copy of the interview report is included in Appendix D. Section 9.0 of this report identifies the individuals interviewed with respect to conditions and operations at the Site. The interviews included topics of general environmental interest and specific areas of interest identified during the records review and visual Site reconnaissance. Pertinent information from these interviews is incorporated into this report.

5.1 FEDERAL ENVIRONMENTAL RECORDS

5.1.1 Federal National Priorities List Sites within One Mile

The National Priorities List (NPL) is a subset of the CERCLA Information System (CERCLIS) and identifies more than 1,200 sites for priority cleanup under the Superfund Program. NPL sites are targeted for long-term remedial action under CERCLA. According to the environmental database report, the USAR Center is not an NPL site and there are no such sites within one mile of the Site.

5.1.2 Federal CERCLA Information System Sites within One-Half Mile

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies, and persons, pursuant to Section 103 of the Act. CERCLIS contains sites that are either proposed to be or are on the NPL and sites that are in the screening and assessment phase for possible inclusion on the NPL.

CERCLIS No Further Remedial Action Planned (NFRAP) sites have been removed and archived from CERCLIS. NFRAP status indicates that, to the best of USEPA's knowledge, assessment at a site has been completed and that no further steps will be taken to list this site on the NPL, unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with the site; it means that, based on available information, the location is not judged to be a potential NPL site.

According to the environmental database report, the USAR Center is not a CERCLIS or CERCLIS NFRAP site and there are no CERCLIS or CERCLIS NFRAP sites within one-half mile of the Site.

5.1.3 RCRA Corrective Action Sites within One Mile

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

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

The RCRA Information Database includes selective information on sites that generate, transport, and treat, store, and/or dispose (TSD) of hazardous waste as defined by RCRA. According to the environmental database report, the USAR Center is not a RCRA TSD site and there are no such sites within one-half mile of the USAR Center.

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

RCRA SQGs are defined as facilities generating between 100 kg and 1,000 kg of hazardous waste per month, while a large-quantity generator (LQG) is defined as a facility generating more than 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month.

As discussed in Section 3.3.2, the USAR Center is a CESQG that was once a SQG. The environmental database search report indicated that no violations were reported for the Site.

One RCRA SQG is listed within one-quarter mile of the Site. One Hour Fabric Care at 1410 North College is 1,163 feet east-southeast from the Site and at a lower relative elevation. No violations are reported for the facility. The EDR report lists this facility as a CESQG. ADEQ file documentation indicates that the facility generates perchloroethene filters and residue which is removed by Safety-Kleen Corporation for disposal. Based on the distance and relative elevation to the Site, the lack of reported violations, and the low rate of waste generation, this property is not considered a potential environmental risk to the Site.

No RCRA LQGs are within one-quarter mile of the Site.

5.1.6 Federal Emergency Response Notification System List

The federal Emergency Response Notification System (ERNS) provides information on reported releases of oil and hazardous substances. According to the environmental database report, the USAR Center is not listed on the ERNS List.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented below was obtained from the environmental database report. Supplemental information was also provided from research at the ADEQ.

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

According to the environmental database report, no solid waste landfills, incinerators, or transfer stations are within one-half mile of the USAR Center. There is no solid waste landfill, incinerator, or transfer station on the Site.

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

The Site itself is not listed in the state LUST database. According to the environmental database report, five LUSTs facilities are within one-half mile of the USAR Center. Three of the listings are for the VA Hospital. Information on the facilities was reviewed at ADEQ. Pertinent information on the LUST sites is summarized below.

- VA Hospital at 1100 North College Avenue, Facility ID 72000053, at an elevation equal than the Site. Several releases have been reported from this facility, as follows.
 - Contaminated soil was discovered during a tank removal in January 1991. The contamination was addressed by excavation and use of a petroleum-degrading product, and the state of Arkansas issued the decision that no further action would be required.

- A diesel fuel release occurred in a generator room in March 1998. Some of the fuel entered a floor drain connected to the sanitary sewer system, some entered a storm water drain, and some migrated to subsurface soil outside a basement wall. The storm water drain with diesel fuel flowed west and then south (away from the Site), and absorbents and an earthen dike were used to recover the fuel in the storm water. Sampling was conducted to define the extent of subsurface contamination on the Site, and bioremediation was used to address the soil contamination. The file information indicated that the soil contamination was confined to a small area near the release point, and would not have impact the USAR Center. In June 1998, the state of Arkansas issued no further action was required for this release.
- ADEQ file information indicated that the VA Hospital complex had four diesel fuel USTs installed in 1960 and removed in February 1999: one 280-gallon, one 2,000-gallon, and two 20,000-gallon capacity. Soil sampling in conjunction with the tank removal indicated that petroleum contamination was present. However, ADEQ conducted a risk assessment and issued a no further action required ruling for the facility.
- The environmental database search report also indicated the presence of four USTs at the VA Hospital complex, but instead of two 20,000-gallon diesel tanks, listed one as a 560-gallon gasoline tank and one as a 500-gallon diesel tank. All tanks were listed as permanently out of service. No information was reviewed that indicated the VA Hospital has active USTs or has any current releases that would have impacted the Site.

Based on the remedial actions performed and the no further action status as determined by ADEQ, this facility is not considered a potential environmental risk to the Site.

- E-Z Mart #384, 1616 North College, Facility ID 72000299, 1,360 feet east at a lower elevation than the Site. This facility has had multiple reported gasoline releases.
 - April 1992 and September 1992: Gasoline vapors were noted in the area. An investigation revealed that a release had occurred. Subsequent work was performed at the site.
 - January 1993: The 1992 release was confirmed by tank tightness test failure. The subsequent investigation included soil and groundwater monitoring. A soil-vapor extraction system was installed and remedial activities continued for approximately four years. A leak was found at a pump in January 1996, which was addressed with the ongoing remediation. Groundwater monitoring continued until 1997. ADEQ issued no further action was required for the release in July 1997.

- October 1996 and February 1997: A faulty tank tightness test indicated a release.
- September 1998: A line leak detector indicated a possible release. Soil samples were collected and the file closed based on the results of the soil sample analysis.
- January 2001: A release was discovered based on facility release detection records. Soil sampling indicated that the released volume was minimal. A no further action ruling was issued by ADEQ in November 2001.

Based on the distance of this facility from the Site, the lower elevation of this facility, the presumed groundwater flow direction toward the east and away from the Site, the remedial actions performed, and the no further action status as determined by ADEQ, this facility is not considered a potential environmental risk to the Site.

- The Fina Station at 2000 North College Street is 2,469 feet northeast at a lower elevation than the Site. A gasoline release from a product line was discovered at this facility in 1989. No additional information or report of closure was provided in the environmental database search report. No documentation for this facility was available for review from ADEQ. Based on the distance and lower elevation of this facility compared to the Site, this facility is not considered a potential environmental risk to the Site.

5.2.3 State-Registered UST Sites within One-Quarter Mile

The environmental database report identified three state-registered UST sites within one-quarter mile. Information about the listed facilities is summarized in Table 3.

Based on the distances and relative elevation of these facilities to the Site, and the use of leak detection equipment on tanks that are in service, these facilities do not appear to pose a potential environmental risk to the Site.

5.2.4 State Hazardous Waste Sites within One Mile

According to the environmental database report, no hazardous waste sites are within one mile of the USAR Center. The Site is not classified as a hazardous waste site.

5.2.5 State Closed Landfills within One-Half Mile

According to the environmental database report, no closed or abandoned landfills have been identified within one-half mile of the USAR Center. There is no closed landfill on the Site.

Table 3				
Registered UST Sites within one-quarter mile				
Facility Name and Address	Facility ID	Distance, Direction, and Topographic Setting in relation to the Site	Number, Size, and Contents of Tanks	Status
Evelyn Hills Texaco 1501 North College	72000221	1,167 feet east; lower elevation	(1) 6,000-gallon gasoline tank — out of service; (1) 500-gallon used oil tank — out of service; (4) 6,000-gallon gasoline tanks — in use	In-use tanks have leak detection equipment. Out of service tanks have been removed.
Catron #5 1599 North College	72000234	1,258 feet east; lower elevation	(2) 8,000-gallon gasoline tanks — out of service; (1) 550-gallon used oil tank — out of service; (1) 2,000-gallon unspecified contents tank — out of service	Removed
E-Z Mart #384 1616 North College	72000299	1,360 feet east; lower elevation	(2) 10,000-gallon gasoline tanks — in use; (1) 6,000-gallon gasoline tank — in use	Tanks have leak detection equipment.

5.2.6 State AST Sites within One-Quarter Mile

According to the environmental database report, no AST sites are within one-quarter mile of the USAR Center. There are no ASTs at the Site.

5.2.7 State Spills Incidents

According to the environmental database report, the USAR Center is not listed on the Arkansas spills database.

5.2.8 State Sites with Institutional and Engineering Controls within One-Half Mile

Institutional controls include administrative procedures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post-remediation care requirements intended to prevent exposure to contaminants remaining onsite. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health. According to the environmental database report, no state-registered sites with Institutional or Engineering Controls are within one-half mile of the USAR Center.

5.2.9 State Voluntary Cleanup Program Sites within One-Half Mile

There are no State Voluntary Cleanup Program (VCP) sites within one-half mile of the USAR Center. According to the environmental database report, the USAR Center is not listed on the VCP list.

5.2.10 State Brownfields Program Sites within One-Half Mile

Included in the listing are brownfields properties addressed by Cooperative Agreement Recipients and brownfields properties targeted by Targeted Brownfields Assessments. According to the environmental database report, no state-registered Brownfield Program Sites are within one-half mile of the USAR Center. According to the environmental database report, the USAR Center is not listed on the brownfields list.

5.2.11 State Enforcement Sites

According to the environmental database report, the USAR Center is not listed on the enforcement list of permit violations.

5.2.12 State Poultry Sludge Permit Sites within One-Half Mile

According to the environmental database report, there are no poultry sludge permit (Sludge) sites within one-half mile of the Site. According to the environmental database report, the USAR Center is not listed on the Sludge list.

5.2.13 State Permit Data System

According to the environmental database report, the USAR Center is not listed on the state permit data system.

5.2.14 State Facility Emission and Stack Data Sites

According to the environmental database report, the USAR Center is not listed on the facility emission and stack list.

5.2.15 State Asbestos Notification of Intent Database Sites

According to the environmental database report, the USAR Center is not listed on the asbestos database.

5.3 TRIBAL ENVIRONMENTAL RECORDS

According to the environmental database report, no designated Indian Reservations are within one mile of the USAR Center.

5.4 UNMAPPED SITES

The environmental database search yielded seven unmapped sites. Unmapped sites are those with address information sufficient only to identify as within the zip code of the target Site. Every effort was made to locate these sites while in the field, and to assess their relevance to this ECP Report. Further research was conducted using maps of the Site and surrounding area. None of the sites were estimated to be within the corresponding ASTM-recommended minimum search distance for the databases on which the sites are listed (ASTM Designation D 6008-96 [2005]).

5.5 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO SITE

During review of environmental information summarized in this section, multiple databases and sites were reviewed to evaluate potential risks to the Site. Facilities identified as potential risks to the Site are detailed in Sections 5.2.2 and 5.2.3. Based on an evaluation of available information and details concerning these facilities, they are considered "Low Risk" sites. No "High Risk" sites were identified. "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at the Site.

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

Findings documented in the following subsections are based on the August 14, 2006, Site and area reconnaissance, review of available Site records, and information obtained from USAR personnel.

6.1 UNDERGROUND AND ABOVEGROUND STORAGE TANKS

No ASTs or USTs were noted on the Site.

6.2 INVENTORY OF CHEMICALS/HAZARDOUS SUBSTANCES

During TEJV's Site reconnaissance, the only chemicals and hazardous substances noted on the Site included: two cylinders of chlorodifluoromethane, one cylinder of Genetron 22, one gallon of Brite Aluminum Fin/Coil Cleaner and Brightener, and oil and paint in containers of 1 gallon or less in the Building 1 mechanical room; consumer-sized quantities of cleaning supplies in the Building 1 janitor's closet; oil and lubricants in flammable materials cabinets inside the OMS; oil and antifreeze in drums in the hazmat storage units near the OMS; and the radioactive items in the caged warehouse areas. The hazmat on the Site consisted primarily of oils and paints. Stains were noted on the concrete floor of the Building 1 mechanical room and on the concrete/asphalt area around the hazmat storage units near the OMS.

USAR personnel stated that the USAR Center has contracted a local pest control company, as needed, for pest control services since at least 1974. Formerly, the USAR Center had a contract with a pest control company to supply pest control services on a regular basis. According to USAR personnel, the Site was treated for termites some time between 1959 and 1986 as a preventative measure. The termite treatment included drilling through the slab and applying termiticide.

No evidence of the storage or mixing of pesticides was noted during the Site reconnaissance.

6.3 WASTE DISPOSAL SITES

Wastes have been removed to offsite locations for disposal throughout the history of this facility. No evidence of landfilling or illegal waste disposal activities was discovered during this ECP survey.

6.4 PITS, SUMPS, DRY WELLS, AND CATCH BASINS

One sump is on the Site — the sump under the wash rack which directs wash water to the OWS. A pit in the OMS, formerly used for vehicle undercarriage inspection and oil changes, was filled in with concrete in the late 1970s.

The Site is served by the City of Fayetteville sanitary sewer system. Wastewater from within the buildings discharges to the sanitary sewer system. Floor drains are in the Building 1 kitchen, the mechanical room, and the restrooms. The janitor's closet does not have a floor drain.

Storm water flows into grated inlets in the parking lot or sheet flows toward the north, then toward Gregory Park. One grated inlet south of the OMS, which may have been associated with a former VWR in that area, reportedly discharges to the sanitary sewer system.

No evidence of a hazardous or petroleum release associated with the Site's sump or drains was identified during the Site reconnaissance.

6.5 ASBESTOS-CONTAINING MATERIAL

According to USAR personnel and documentation reviewed during this investigation, asbestos surveys of the existing buildings were performed in 1986 and in 1997, and abatement of some ACM was conducted in the 1980s. According to USAR personnel, abatement actions included removing flooring and mastic, insulation on boiler piping and ductwork, and black strips on two ceiling-mounted air conditioner units in the drill hall that contained asbestos. A 1997 inspection did not identify ACM through sampling, but did note insulation in a crawl space and floor tile in the latrines as suspect ACM which was inaccessible. During the Site reconnaissance, the locations of suspect ACM which were not sampled in 1997 were not viewed.

6.6 PCB-CONTAINING EQUIPMENT

As described in Section 3, there are four PMTs on the perimeter of the property, three on a pole on the west side and one on a pole at the northwest corner of the Site. The PMTs have been tested for PCB content, as documented in a letter dated April 22, 1993, from the Southwestern Electric Power Company. The PMTs on the west side of the Site contain 5 ppm, 5 ppm, and 6 ppm PCBs, concentrations considered to be non-PBC-containing. The PMT at the northwest corner of the Site contained 1 ppm PCBs, which is considered non-detect. The transformers were observed to be in good condition during the Site reconnaissance.

6.7 LEAD-BASED PAINT

A LBP survey was conducted by an outside consultant in November 1993. The report stated that the interior of the facility was painted every five years, with the last painting event in 1988. Areas of concern identified by the survey include: two exterior doors at the main entrance to Building 1, another exterior door, and a rollup door on the "garage." The survey did not provide a map of locations sampled. USAR personnel stated that the doors at the main entrance had been replaced with glass doors and the other doors that tested positive for LBP were an exit door and a rollup door in the Drill Hall of Building 1

(not a garage door on the OMS). During the Site reconnaissance, the paint on the rollup door in the Drill Hall was flaking and not in good condition, and the main entrance doors were noted to be constructed of glass, not steel, as had been reported in the survey.

6.8 RADON

The May 2005 EBS stated that a radon survey was performed at the Site in November 1998 by the USAR. The report stated that levels greater than 4.0 pCi/L were not measured during the survey.

According to the USEPA, Washington County is in an area with low propensity for radon. The USEPA classifies the 72703 zip code area as Radon Zone 3, which has average radon levels less than 2 pCi/L. The USEPA tested 10 sites in this zip code. The sites averaged 1.750 pCi/L in first floor living areas and 1.950 pCi/L in basement areas. The USEPA-recommended residential action level is 4.0 pCi/L; therefore, radon is not an environmental concern at the Site.

6.9 UNEXPLODED ORDNANCE

The arms vault in Building 2 contains ammunition. The tool room in Building 1 was once an ammunition storage room, but no ordnance remains in that room. No firing ranges have been on the Site and no ordnance is stored in other locations. No indications were found during the Site reconnaissance or during the review of records to indicate the presence of unexploded ordnance at the Site.

6.10 RADIOACTIVE MATERIALS

The USAR Center stores equipment with radioactive sources in locked cages on the second floor of the warehouse portion of Building 1. The equipment includes items such as dosimeters, radiac chargers, radiac detection meters, compasses, and chemical detection meters. Signs and placards are posted on the equipment storage areas. The radioactive materials contained in the meters are shielded and low-level sources. Some of the equipment is calibrated, maintained, and repaired by an outside contractor (AAI Services) that operates in the OMS.

No radioactive waste is generated at this facility.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

According to the City of Fayetteville zoning district map, the Site is zoned P-1, Institutional District. The P-1 Institutional Zoning District is designed to protect and facilitate use of property owned by larger public institutions and church related organizations. In the P-1, Institutional District, any structures to be erected or land to be used shall be for: City-wide Uses by Right as listed in Chapter 162, Use Unit 1 of the Unified Development Ordinance and/or Cultural and Recreational Facilities included in Chapter 162, Use Unit 4 of the Unified Development Ordinance. Several other uses are permissible on appeal to the planning commission including use for specific public and private facilities, public protection and utility facilities, and high density multi-family dwelling.

Land to the north, east, and south of the USAR Center is also zoned P-1. Land to the east is zoned RSF-4, a residential zoning designation.

7.2 COASTAL ZONE MANAGEMENT

There is no coastal zone management plan for the state of Arkansas. This state has no coastal areas.

7.3 WETLANDS

The Site is upland and well drained. According to the U.S. Fish and Wildlife Service National Wetlands Inventory map, no jurisdictional wetland areas are on the Site or adjacent properties. The nearest wetlands are two areas located approximately 2,000 feet to the west-southwest of the Site, east of Scull Creek. The wetlands code associated with the designated areas is POWHx, which indicates the areas are Palustrine, open water/unknown bottom, permanently flooded, and excavated.

7.4 100-YEAR FLOODPLAIN

The FEMA Flood Insurance Rate Map for the Site area provided by the NRCS field office in Fayetteville, dated September 18, 1991, indicates that the Site lies outside the 500-year and 100-year flood plains.

7.5 NATURAL RESOURCES

No survey for threatened and endangered species at this Site was reviewed during the course of this investigation. Information obtained from the Arkansas Heritage Program lists these species in Washington County as endangered: the American burying beetle; the Ozark big-eared, the gray myotis, and the Indiana bats; and the Missouri bladderpod plant. Due to its development, threatened and endangered species are not expected to be present on the Site. The strip of wooded area on the northern portion of the Site is contiguous with the wooded and undeveloped areas of Gregory Park to the north and east.

7.6 CULTURAL RESOURCES

As described in Section 3.5.3, a cultural resource assessment was performed for the Site. The conclusion was that there were no architectural or archaeological issues at the Site. The Site has a “low” archaeological potential and is not eligible for the National Register of Historic Places.

7.7 OTHER SPECIAL RESOURCES

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

8.0 CONCLUSIONS

The TEJV, under contract to the USACE, Louisville District, has prepared this ECP Report for the Leroy R. Pond USAR Center (Facility ID AR010), at 1616 North Woolsey Avenue in Fayetteville, Washington County, Arkansas. The USAR Center encompasses approximately 3.5 acres of land with three permanent structures: a 14,921-square-foot Building 1, a 5,220-square-foot Building 2, and a 4,137-square-foot OMS. The site is currently occupied by the 362nd Psychological Operations Company, 332nd Chemical Company Biodetection Unit, and 489th Combat Engineers Support.

Findings of this ECP are based on existing environmental information, including visual observations, Site records, and federal, state, and local database and file information related to the storage, release, treatment, or disposal of hazardous substances or petroleum products or derivatives on the Site. The following present the findings related to areas evaluated during the ECP process.

- **Hazardous Substances.** Chemicals containing CERCLA hazardous substances would have been used and stored at the Site in amounts necessary to support unit-level vehicle and building maintenance activities. However, the quantities stored for one year or more would not have exceeded 1,000 kg or the RQ of designated hazardous substances, or one kg of acutely hazardous waste. There is no evidence that the chemicals used or stored were ever improperly handled, released, or disposed at the Site. Documentation listed TCA as a hazardous substance present on the Site. No information was provided as to the use or location of the TCA, which is a common degreaser/solvent used in parts washers, in conjunction with vehicle and equipment maintenance.
- **USTs/ASTs.** No evidence was found indicating USTs or ASTs have been on the Site.
- **Non-UST/AST Petroleum Storage.** Petroleum storage areas have included designated areas within the OMS, in the POL storage shed formerly south of the OMS, and in the two hazmat storage cabinets currently south of the OMS. No stained soil or stressed vegetation was observed during the Site reconnaissance.
- **PCBs.** There are four PMTs on the west and northwest sides of the Site whose status has been documented as non-PCB-containing.
- **ACM.** An *Asbestos Building Survey*, dated January 1997, conducted by the Environmental Section of the U.S. Army 90th RSC, USAR did not identify ACM at the Site. However, two areas of suspect ACM were not sampled due to access limitations: insulation in the crawl space between two ceilings and floor tile under the partitions in the men's and women's restrooms.

- **Lead and LBP.** A LBP survey has been conducted at this facility. The survey indicated that four locations have LBP. USAR personnel stated that some of the locations have been abated, but that two exterior doors on the Building 1 Drill Hall still have LBP. The paint on one of these, the rollup door, is flaking and not in good condition.
- **Radiological Materials.** Radiological materials identified during the Site reconnaissance were limited to items stored in the warehouse caged areas, with placards and signs. There is no evidence of any release of radiological materials at the Site.
- **Radon.** A radon survey performed at the Site in 1998 indicated all levels detected were less than 4 pCi/L. The USEPA-recommended residential action level is 4.0 pCi/L; therefore, radon is not an environmental concern at the Site.
- **Munitions and Explosives.** No evidence was found during the Site reconnaissance or records review process of the past presence of munitions and explosives of concern.
- **Surrounding Properties.** Potential environmental sites of concern, located within corresponding ASTM-recommended minimum search distances from the Site were evaluated. Land use at the adjacent properties does not appear to have changed significantly over the years and does not appear to have impacted the environmental conditions of the USAR Center.

Areas of potential environmental concern were reviewed and the TEJV found no significant concerns relating to the environmental condition of the Site. In accordance with DoD policy defining the classifications (see S.W. Goodman Memorandum dated October 21, 1996), the Site has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

9.0 REFERENCES

PERSONS CONTACTED

- Gerald Benjamin, Facilities Manager, (479) 442-8141. Meeting on August 14, 2006.

RESOURCES CONSULTED

- accessFayetteville Web page <http://www.accessfayetteville.org> for information about Fayetteville, Arkansas, and zoning map.
- Arkansas Department of Environmental Quality, Little Rock, Arkansas, file review records.
- Arkansas Department of Environmental Quality Web page for regulated storage tank records at <http://www.adeq.state.ar.us/>
- Arkansas Heritage Program Web page for rare species in Washington County, Arkansas at <http://www.naturalheritage.com/program/element-search/default.asp>
- Department of the Army, BRAC 05 Installation NEPA Information Needs Questionnaire completed by Jim Wheeler, USAR 90th RRC.
- Department of the Army, Memo from Gerald Benjamin, dated March 15, 1993, listing ozone depleting chemicals-containing equipment present at the Site.
- Department of the Army, Letter from Gerald Benjamin dated June 13, 1996, to the state of Arkansas Hazardous Waste Division requesting change in generator status.
- EnSafe Inc. *Oil-Water Separator Evaluation*. May 5, 2000.
- Engineering, Compliance & Construction, Inc. *Environmental Baseline Survey* for the Leroy R. Pond U.S. Army Reserve Center, Fayetteville, Arkansas. May 2005.
- Environmental Data Resources Inc. *The EDR Radius Map with GeoCheck*. Inquiry No. 1720032.2s. (July 20, 2006). 440 Wheeler Farms Road, Milford, Connecticut (800) 352-0050.
 - *The EDR City Directory Abstract*. Inquiry No. 1720032.6 (July 26, 2006).
 - *The EDR Historical Topographic Map Report*. Inquiry No. 1720032.6 (July 26, 2006), maps dated 1918, 1957, and 1972.
- ETC Engineers, Inc. Lead-based Paint and Ozone Depleting Chemical Assessment and Management. January 1994.

- Fayetteville Public Library. Historical street maps dated 1936, 1958, 1960, and 1967; historical topographic map dated 1976; and Polk City Directory information 1904-1965. 401 West Mountain Street, Fayetteville, Arkansas.
- Federal Emergency Management Agency. *Flood Insurance Rate Map, Washington County, Arkansas and Incorporated Areas, Map Number 05143C0084 C*, obtained at the Natural Resources Conservation Service, Fayetteville Service Center. September 18, 1991.
- Goodman, S.W. *Memorandum: Clarification of "Uncontaminated" Environmental Condition of Property at Base Realignment and Closure (BRAC) Installations*. October 21, 1996.
- Leroy R. Pond USAR Center environmental and facility records, including Environmental Compliance Assessment PreSite Visit Checklists, 1993 and 1999; facility construction diagrams; LBP and ozone depleting chemical inspection report; report on water fountain testing for lead; and the Spill Prevention Control and Countermeasures Plan for the Site.
- Memorandum for Directorate of Environmental Quality, dated March 26, 1993, concerning the status of asbestos at Reserve Centers in Oklahoma and Arkansas.
- NETR-Real Estate Research & Information, 2055 East Rio Salado Parkway, Tempe, Arizona, 85281. *Historical Chain-of-Title Report*. Project No. N06-4896. August 1, 2006.
- Parsons Engineering Science, Inc. *Historic Architectural Resources Assessment of 90th Regional Support Command Facilities in Arkansas* (for Department of the Army, 90th Regional Support Command). February 1998.
- Parsons Engineering Science, Inc. *Management Summary, Cultural Resources Assessment of 90th Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas* (for Department of the Army, 90th Regional Support Command). February 1998.
- Southwestern Electric Power Company. Letter dated April 22, 1993, regarding the PCB content of the pole-mounted transformers at the Site.
- U.S. Army Center for Health Promotion and Preventive Medicine. *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97* (for 90th Regional Support Command). September 30, 1997.
- U.S. Army 90th Regional Support Command. *Asbestos Building Inspection, Leroy R. Pond U.S. Army Reserve Center, Fayetteville, Arkansas*. January 1997.

- U.S. Department of Agriculture, Fayetteville Service Center. Washington County, 2898 North Point Circle #2, Fayetteville, Arkansas. Aerial photographs dated 1972, 1980, 1986, and 1994.
- U.S. Department of Agriculture, Soil Conservation Service, *Soil Survey, Washington County, Arkansas*. March 1969.
- U.S. Fish & Wildlife Services *National Wetlands Inventory Map* provided by the Natural Resources Conservation Service, Fayetteville Service Center, 2898 North Point Circle #2, Fayetteville, Arkansas.
- U.S. Geological Survey TerraServer-USA. (January 30, 1995 aerial photograph). Retrieved from <http://www.terraserver-usa.com/>
- Washington County Tax Assessor, Urban Property Record Card — 2006 for the Site.

Agencies Contacted

- Arkansas Department of Environmental Quality, Little Rock, Arkansas
- Washington County Tax Appraiser's Office, Fayetteville, Arkansas
- Fayetteville Public Library, Fayetteville, Arkansas
- U.S. Department of Agriculture, National Resources Conservation Service
- U.S. Department of Agriculture, Farm Services Agency

Appendix A
Figures

FIGURES

- Figure 1 General Site Location Map
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- Figure 19 FEMA Flood Plain Map
- Figure 20 Wetland Map

Appendix B
Site Reconnaissance Photographs

Appendix C
Chain-of-Title Report

Appendix D
Previous Environmental Reports

PREVIOUS ENVIRONMENTAL REPORTS

1. Arkansas Department of Environmental Quality, file review records.
2. Arkansas Department of Environmental Quality, regulated storage tank information.
3. Arkansas Heritage Program, information on rare species in Washington County.
4. Department of the Army, BRAC 05 Installation NEPA Information NEEDS Questionnaire for Leroy R. Pond USAR Center.
5. Department of the Army, Memo from Gerald Benjamin, dated March 15, 1993, listing ozone depleting chemical-containing equipment present at the Site.
6. Department of the Army, letter from Gerald Benjamin dated June 13, 1996, to the state of Arkansas regarding generator status.
7. Environmental, Compliance & Construction, Inc. *Environmental Baseline Survey of the Leroy R. Pond U.S. Army Reserve Center, Fayetteville, Arkansas.* May 2005.
8. EnSafe Inc. *Oil-Water Separator Evaluation.* May 5, 2000.
9. ETC Engineers, Inc. Lead-based Paint and Ozone Depleting Chemical Assessment and Management. January 1994.
10. Interview records.
11. Leroy R. Pond USAR Center Environmental Compliance Assessment PreSite Visit Checklists, 1993 and 1999.
12. Memorandum for Directorate of Environmental Quality, dated March 26, 1993, concerning the status of asbestos at Reserve Centers in Oklahoma and Arkansas
13. Parsons Engineering Science, Inc. *Management Summary, Cultural Resources Assessment of 90th Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas.* February 1998.

14. Parsons Engineering Science, Inc. *Historic Architectural Resources Assessment of the 90th Regional Support Command Facilities in Texas*. February 1998. (pertinent pages only)
15. Southwestern Electric Power Company. Letter dated April 22, 1993, regarding the PCB content of transformers at the Site.
16. U.S. Army Center for Health Promotion and Preventive Medicine. *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97*. September 30, 1997. (pertinent pages only)
17. U.S. Army 90th Regional Support Command. *Asbestos Building Survey, Leroy R. Pond USAR Center, Wichita Falls, Texas*. January 1997.
18. U.S. Department of Agriculture, Soil Conservation Service. *Soil Survey of Washington County, Arkansas*. March 1969. (pertinent pages only.)
19. Washington County Tax Assessor, Urban Property Record Card — 2006.

Appendix E
Regulatory Database Search Report and Site Report