

FINAL

**ENVIRONMENTAL CONDITION OF
PROPERTY REPORT**

**PVT GEORGE L. RICHEY
U.S. ARMY RESERVE CENTER (CA069)
155 WEST HEDDING STREET
SAN JOSE, CALIFORNIA 95110**

Prepared For:

**U.S. Army Corps of Engineers – Louisville District
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MARCH 2007

CERTIFICATION

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

WAYNE J. ALVES
Environmental Division ARIM
Chief Environmental Division
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DATE

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



LENARD GUNNELL, P.G.
Project Geologist
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EXECUTIVE SUMMARY

Lawhon & Associates, Inc., in conjunction with Fuller, Mossbarger, Scott and May Engineers, Inc. (FMSM), under contract to the U.S. Army Corps of Engineers (USACE), Louisville District, has prepared this Environmental Condition of Property (ECP) Report for the George L. Richey U.S. Army Reserve Center (Facility ID CA069), hereinafter referred to as the "Site" or "USAR Center". The Site is located at 155 West Hedding Street, San Jose, California and encompasses approximately 8.60 acres of land.

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

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

The USAR Center facility is situated on approximately 8.60 acres of land, located directly southeast of Norman Y. Mineta San Jose International Airport, in the central portion of the City of San Jose, California. The Site consists of three permanent buildings: a 32,653 square-foot administration building, a 6,647 square-foot storage/arms vault and a 6,648 square-foot Organizational Maintenance Shop (OMS). The USAR Center is currently occupied by the 6045th Garrison Support Unit (GSU), 341st Military Police (MP), and the 381st MP.

Based on a review of aerial photographs dating back to 1939 and U.S. Geological Survey (USGS) topographic maps dating back to 1953, the Site has served as a USAR Center since 1953. The administration building, the storage/arms vault, and the OMS were constructed in 1953-1954. The land and buildings are owned by the U.S. Government.

Areas of potential environmental concern were reviewed and Lawhon & Associates, Inc. identified petroleum impacts relating to the USAR use of this property. Petroleum contamination from a former diesel underground storage tank (UST) was remediated, by removing impacted soils. In addition, petroleum in groundwater beneath the northeast corner of the Site migrated from an adjacent Santa Clara County Maintenance Garage. Groundwater sampling results have indicated low levels of petroleum hydrocarbons beneath the northeast corner of the Site, but not in concentrations which exceed California Regional Water Quality Control Board (CRWQCB) action levels.

In accordance with Department of Defense policy defining the classifications (See Deputy Under Secretary of Defense Goodman Memorandum dated 21 October 1996), the Property has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

TABLE OF CONTENTS

SECTION & TITLE	PAGE NO.
EXECUTIVE SUMMARY.....	III
TABLE OF CONTENTS	V
LIST OF TABLES & APPENDICES.....	VIII
LIST OF ACRONYMS.....	X
1.0 INTRODUCTION.....	1
1.1 Purpose of Environmental Condition of Property Report.....	1
1.2 Scope of Services	2
2.0 SITE LOCATION AND PHYSICAL DESCRIPTION.....	4
2.1 Site Location	4
2.2 Asset Information	4
2.3 Physical Description.....	5
2.4 Site Hydrology and Geology.....	6
2.4.1 Surface Water Characteristics	6
2.4.2 Geology/Hydrogeology Characteristics.....	7
2.5 Site Utilities	8
2.6 Water Supply Wells & Septic Systems.....	8
3.0 SITE HISTORY.....	9
3.1 History of Ownership.....	9
3.2 Past Uses and Operations	9
3.3 Past Use, Storage, Disposal, and Release of Hazardous Substances	11
3.3.1 Past Use and Storage of Hazardous Substances.....	11
3.3.2 Past Disposal and Release of Hazardous Substances.....	11
3.4 Past Presence of Bulk Petroleum Storage Tanks	12
3.5 Review of Previous Environmental Reports	12
3.5.1 Radon Report for 63 rd RRC Reserve Centers, August 23, 1994.....	12
3.5.2 Indoor Firing Range Closure Documents, Navy Public Works, November 3, 1994, 63 rd RRC.....	12
3.5.3 Final Closure Letter Report for the Removal of the UST, Harding Lawson Associates, August 3, 2000	13
3.5.4 Phase I Environmental Site Assessment, George L. Richey USAR Center, URS Corporation, July 26, 2002	13
3.5.5 Renewal of License (DACA 05-3-97-600) to the Santa Clara County, CA for a Monitoring Well at the PVT George Richey Army Reserve Center, San Jose, CA; September 18, 2002	13
3.5.6 Installation Restoration Program Decision Document to Support No Further Action (Grease Rack and Vehicle Wash Rack), 63 rd RRC, March 2003.....	13
3.5.7 2005 Annual Groundwater Monitoring Report, Civic Center Garage (Santa Clara County Maintenance Garage); Lowney Associates, October 17, 2005.....	14

3.5.8	Environmental Baseline Survey (EBS), George L. Richey USAR Center (CA069); Installation Management Agency, USAR, January 30, 2006	14
4.0	ADJACENT PROPERTIES	15
5.0	REVIEW OF REGULATORY INFORMATION	16
5.1	Federal Environmental Records	16
5.1.1	RCRA Corrective Action (CORRACTS) Sites within 1.0-Mile	18
5.1.2	Federal RCRA Small and Large Quantity Generators List within ¼ - Mile	19
5.1.3	Facility Index System/Facility Registry System (FINDS) Site	20
5.2	State and Local Environmental Records	20
5.2.1	California DTSC's Annual Workplan (AWP) Sites within 1 - Mile	22
5.2.2	State-Registered California Sites (Cal-Sites) Within 1 - Mile	22
5.2.3	California Waste Discharge System (CA WDS) – Target Property	23
5.2.4	Hazardous Waste & Substances Sites List (Cortese) Within ½ - Mile	23
5.2.5	State-Registered LUST Sites within ½ - Mile	24
5.2.6	Santa Clara County Historical LUST Sites within ½ - Mile	24
5.2.7	State-Registered UST Sites within ¼ - Mile	25
5.2.8	State-Registered Historical UST Sites within ¼ - Mile	25
5.2.9	Proposition 65 Notification Sites within 1 - Mile	25
5.2.10	Facility and Manifest Data (HAZNET) – Target Property Search	26
5.3	Tribal Environmental Records	26
5.4	EDR Proprietary Records	27
5.4.1	EDR Historical Cleaner Sites within ¼-mile	27
5.5	State Agencies Contacted	27
5.6	Unmapped Sites	27
5.7	Summary of Properties Evaluated to Determine Risk to the Site	28
6.0	SITE INVESTIGATION AND REVIEW OF HAZARDS	31
6.1	Aboveground Storage Tanks	31
6.2	Asbestos Containing Material	31
6.3	Hydraulic Equipment	31
6.4	Inventory of Chemicals / Hazardous Substances	31
6.5	Indoor Firing Range	33
6.6	Lead-Based Paint	33
6.7	Munitions and Explosives of Concern (MEC)	33
6.8	Nearby Properties	33
6.9	Oil/Water Separator	34
6.10	Pits, Sumps, Drywells, and Catch Basins	34
6.11	PCB Containing Transformers	34
6.12	PCB Containing Equipment	34
6.13	Pesticides/Herbicides	35
6.14	Radioactive Materials	35
6.15	Radon	35
6.16	Underground Storage Tanks	35
6.17	Waste Disposal Activities	36
6.18	Wash Rack/ Grease Rack	36
7.0	REVIEW OF SPECIAL RESOURCES	37

7.1	Land Use.....	37
7.2	Coastal Zone Management.....	37
7.3	Wetlands.....	37
7.4	100-Year Flood Plain.....	37
7.5	Cultural Resources.....	37
8.0	CONCLUSIONS.....	38
9.0	LIMITATIONS.....	42
10.0	REFERENCES.....	44

LIST OF TABLES & APPENDICES

TABLES:

TABLE E-1 SUMMARY OF ENVIRONMENTAL CONCERNS

TABLE 1 LIST OF ADJACENT PROPERTY OWNERS

TABLE 2 FEDERAL DATABASE SEARCH

TABLE 3 STATE DATABASE SEARCH

TABLE 4 TRIBAL DATABASE SEARCH

TABLE 5 EDR PROPRIETARY DATABASE SEARCH

TABLE 6 PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS

APPENDIX A: FIGURES

Figure 1 General Site Map

Figure 2 Site Layout Plan

Figure 3 Interior Layout of Administration Building – 2nd Floor

Figure 4 Interior Layout of Administration Building – 1st Floor

Figure 5 Interior Layout of Administration Building – Basement

Figure 6 Interior Layout of Building 101

Figure 7 Interior Layout of OMS Building 102

Figure 8 Flood Plain/National Wetlands Inventory Map

Figure 9 1953 USGS 7.5-Minute Topographic Map

Figure 10 1961 USGS 7.5-Minute Topographic Map

Figure 11 1968 USGS 7.5-Minute Topographic Map

Figure 12 1973 USGS 7.5-Minute Topographic Map

Figure 13 1980 USGS 7.5-Minute Topographic Map

Figure 14 1939 Aerial Photograph

Figure 15 1956 Aerial Photograph

Figure 16 1965 Aerial Photograph

Figure 17 1974 Aerial Photograph

Figure 18 1982 Aerial Photograph

Figure 19 1993 Aerial Photograph

Figure 20 1998 Aerial Photograph

APPENDIX B: SITE RECONNAISSANCE PHOTOGRAPHS

APPENDIX C: PROPERTY ACQUISITION DOCUMENTS AND CHAIN OF TITLE
REPORT

APPENDIX D: PREVIOUS ENVIRONMENTAL SITE ASSESSMENT REPORTS

APPENDIX E: REGULATORY DATABASE SEARCH REPORTS

LIST OF ACRONYMS

ACM	Asbestos Containing Material
AMSA	Area Maintenance Support Activity
AR	Army Regulation
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
AWP	Annual Work Plan
bgs	Below Ground Surface
BRAC	Base Realignment and Closure
BRRM	Base Redevelopment and Realignment Manual
CA WDS	California Waste Discharge System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CERFA	Community Environmental Response Facilitation Act
CFR	Code of Federal Regulations
CONEX	Container Express
CORRACTS	Resource Conservation Recovery Act (RCRA) Corrective Action Activity
CRWQCB	California Regional Water Quality Control Board
DOD	Department of Defense
DRMO	Defense Reutilization and Marketing Organization
DRMO HW	Defense Reutilization and Marketing Organization Hazardous Waste Agreement
DTSC	California Department of Toxic Substances Control
ECP	Environmental Condition of Property

EDR	Environmental Data Resources, Inc.
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FINDS	Facility Index System/Facility Registry System
GSA	Santa Clara County General Service Administration
GSU	Garrison Support Unit
HAZNET	Hazardous Material Facilities
IFR	Indoor Firing Range
kg	kilogram
LBP	Lead Based Paint
LUST	Leaking Underground Storage Tank
MEC	Munitions and Explosives of Concern
MEP	Military Equipment Parking
MP	Military Police
MTBE	Methyl Tertiary-Butyl Ether
NPDES	National Pollutant Discharge Elimination System
NFA	No Further Action
NPL	National Priorities List
NRCS	Natural Resource Conservation Service
O&M	Operations and Maintenance
OMS	Organizational Maintenance Shop
OSHA	Occupational Safety Health Administration
OWS	Oil/Water Separator
PCB	Polychlorinated Biphenyl

pCi/L	picoCuries per liter of air
PG&E	Pacific Gas & Electric
POL	Petroleum, Oil, and Lubricant
POV	Privately Owned Vehicle
PRG	Preliminary Remediation Goals
RCRA	Resource Conservation and Recovery Act
RCRIS	RCRA Information System
RRC	Regional Readiness Command
Site	PVT. George L. Richey U.S. Army Reserve Center (CA069)
sf	square feet
STATSGO	State Soil Geographic Database
SQG	RCRA Small Quantity Generator
TSD	Treatment, Storage, or Disposal
TPH	Total Petroleum Hydrocarbons
µg/sf	Micrograms per Square Foot
USACE	United States Army Corps of Engineers
USAR	United States Army Reserve
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
VTA	Valley Transit Authority

1.0 INTRODUCTION

Lawhon & Associates, Inc., Columbus, Ohio was authorized to prepare an ECP report for the PVT George L. Richey U.S. Army Reserve Center (CA069). The facility is located at 155 West Hedding Street, San Jose, Santa Clara County, California hereinafter referred to as the "Site" or "USAR Center". In support of this ECP Report, a visual reconnaissance of the Site was conducted on August 11, 2006. The purpose of the visit was to visually obtain information indicating the environmental condition of property at the Site.

1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY REPORT

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

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

The ECP Report contains the information required to comply with the provisions of 40 Code of Federal Regulations (CFR) Part 373, which require that a notice accompany contracts for the sale of, and deeds entered into, for the transfer of federal property on which any hazardous substance was stored, released or disposed of. The

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 120(h) stipulates that a notice is required if certain quantities of designated hazardous substances have been stored on the property for one year or more – specifically, quantities exceeding 1,000 kilograms or the reportable quantity, whichever is greater, of the substances specified in 40 CFR 302.4 or one kilogram of acutely hazardous waste as defined in 40 CFR 261.30. A notice is also required if hazardous substances have been disposed of or released on the property in an amount greater than or equal to the reportable quantity. Army Regulation (AR) 200-1 requires that the ECP Report address asbestos, lead-based paint, radon and other substances potentially hazardous to human health.

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

1.2 SCOPE OF SERVICES

This ECP report covers the 8.60 acre USAR Center located at 155 West Hedding Street, San Jose, California. The Site is bounded by West Hedding Street and the Santa Clara County Jail/Courthouse to the south. West Younger Avenue and the Valley Transit Authority (VTA) border the Site to the north. San Pedro Street and the City of San Jose's Parking Garage, parking lot, and fueling station border the Site to the east, and a City of San Jose Parking Garage and the National Guard border the Site to the west. Site maps are provided in Appendix A. Appendix B (Plates 1-41) provides a photographic overview of the Site visit in August 2006. Appendix C provides environmental lien documentation for the Site and chain of title information. Historical environmental documents and reports are provided in Appendix D, while Appendix E contains the Environmental Data Resources, Inc. (EDR) reports.

This ECP report classifies the property into one of seven DoD Environmental ECP categories as defined by the Deputy Under Secretary of Defense S. Goodman Memorandum, "Clarification of 'Uncontaminated' Environmental Condition of Property at BRAC Installations" (21 October 1996). The property classification categories are as follows:

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

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

2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

2.1 SITE LOCATION

The USAR Center is located Santa Clara County, California, within the city limits of San Jose, California. The Site is located in a primarily commercial area. Figure 1 in Appendix A provides a general Site location map.

2.2 ASSET INFORMATION

Facility Name and Address: PVT George L. Richey U.S. Army Reserve Center
(CA069)
155 West Hedding Street
San Jose, California 95110

Property Owner: United States of America

Date of Ownership: May 24, 1950

Current Occupant: 6045th Garrison Support Unit (GSU)
341st MP Company
381st MP BN

Zoning: R-1-8, Single Family Residential

County, State: Santa Clara, California

USGS Quadrangle(s): San Jose West, California

Section/Township/Range: Section 4, Township 5 South, Range 11 East

Latitude/Longitude: 37° 21' 5.4" N; 121° 54' 26.6" W

Legal Description: Being those parcels or tracts of land, consisting of approximately 8.6 acres of land, situated and lying in the northwest corner of West Hedding Street and North San Pedro Street, in the City of San Jose, Santa Clara County, State of California. Assessor's Parcel No. 230-37-37 and 230-37-38.

2.3 PHYSICAL DESCRIPTION

The USAR Center is situated on approximately 8.60 acres of land with three permanent structures: an administration building (Building 100), a storage/arms vault (Building 101), and an OMS building (Building 102). Construction of the three structures occurred from 1953 - 1954.

Building 100, the George L. Richey USAR Center administration building, is the predominant structure on the Site located in the southern portion of the Site. It is a two story cinder block structure with a basement. The exterior of the building is finished with stucco. The interior is primarily painted cinder block walls, 12-inch floor tile and drop ceilings. The structure was built in 1953-1954 and contains a total area of 32,653 square feet (sf). The building is used primarily for administrative offices, training classrooms, former indoor firing range (IFR), former arms vault, assembly hall and storage. A sanitary lift station is located in the southwest corner of the basement (Plates 4 and 5 in Appendix B). Figures 3, 4, and 5 in Appendix A provide a layout of the interior of the administration building.

Building 101, the storage/arms vault building, is located just north of the USAR Center administration building. It is a one story cinder block structure situated on a concrete slab foundation and is finished with a stucco exterior. The structure was built in 1953-1954 and contains a total area of 6,647 sf. The building is used as an arms vault and has numerous steel cage storage areas (containing, but not limited to, chemical detectors and assorted field supplies). Photographs of this building are found on Plates 2, 6, 12, 13 and 15 in Appendix B. Figure 6 in Appendix A provides a layout of the interior of the storage/arms vault building.

Building 102, the OMS, is also a one story cinder block structure with a stucco exterior located directly north of Building 101. The OMS building was constructed on a concrete slab foundation in 1953-1954. The structure occupies 6,648 sf and has two metal overhead retractable bay doors at opposing ends. The structure contains several caged storage areas containing vehicle maintenance tools, a battery storage room, and a hazardous waste storage area. A former grease rack was located to the north of the building. There is a floor drain in the battery room of the OMS building, which reportedly discharges to the sanitary sewer. According to Site personnel, only Level 1 type maintenance activities (tire changes, fluid changes, etc.) are conducted in the OMS. Photographs of this building are found on Plates 7-11 and 16 in Appendix B. Figure 7 in Appendix A provides a layout of the interior of the OMS building.

A wash rack discharges to an oil/water separator (OWS), and is located just south of the OMS building, between the OMS and the storage/arms vault (Plate 41 in Appendix B). According to a Site representative, the OWS is equipped with a storm water diversion valve that allows rainwater to be diverted through the unit and discharge directly to the local storm drains during heavy storm events.

According to an Environmental Baseline Survey report (Section 3.5.8), a former OWS and wash rack were located in the northeast portion of the Site and were removed in August 2000.

According to a previous Phase I Environmental Site Assessment (Section 3.5.4), a former fueling station was located northwest of Building 102. The fueling structure and UST were removed in 1993.

During the 2006 Site visit, various military vehicles were observed in a military equipment parking (MEP) area. Approximately 35 non-permanent metal Container Express (CONEX) containers were also observed in the MEP area. A total of four hazardous material storage sheds and two wooden storage cabinets are located west of the OMS building, adjacent to the MEP area. The CONEX containers and hazardous material storage sheds were locked and inaccessible at the time of the Site visit (Plates 33-34 in Appendix B). Mechanical tools and additional OMS equipment are stored in the two wooden sheds.

The majority of the 8.60 acre tract is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining area, mainly around the administration building, is covered by landscaped grounds and a sparse population of deciduous trees. A portion of the privately owned vehicle (POV) parking area on Site is being utilized by the Santa Clara County General Service Administration (GSA) to park vehicles. The Site is secured by fencing within the MEP area, and the area that GSA is utilizing is independently secured by additional fencing on the interior of the Site.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Figure 13 in Appendix A provides a portion of the 1980 San Jose West, California USGS topographic map which includes the Site. The topography at the Site is generally level with a land surface elevation of approximately 67 feet above mean sea level. Based on surface topography and a visual inspection of the Site, storm water generally flows towards the northeast into storm drains located along San Pedro Street and West Younger Avenue where it is discharged to the Guadalupe River, northwest of the Site.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 0603490019E, the Site is not included in the 100-year floodplain elevation but does lie within the 500-year floodplain elevation. Figure 8 in Appendix A provides a map depicting the extent of the 100-year and 500-year floodplains in relation to the Site.

2.4.2 Geology/Hydrogeology Characteristics

According to the EDR Report (Appendix E) soil in the vicinity of the Site is generally clay loam. This type of soil has moderate infiltration rates with moderately coarse textures. In a typical profile, the surface layer is 0-9 inches thick and is a clay loam. The subsoil is approximately 9-41 inches thick and is silty clay loam.

According to information acquired from the Natural Resource Conservation Service (NRCS) State Soil Geographic Database (STATSGO) for Santa Clara County, soils at the Site are from the Botella series. According to the EDR report, this soil does not meet the requirements for a hydric soil.

According to the 2005 Annual Groundwater Monitoring Report, by Lowney Associates (Section 3.5.7), the USAR Center is located within the Santa Clara Valley groundwater basin, which is the largest and most developed of the groundwater basins within the San Francisco Bay Area. The basin is commonly divided into two areas: (1) the forebay, where groundwater occurs in a single, unconfined aquifer and (2) the confined area, which consists of two aquifer zones (upper and lower) separated by a regional aquitard. The forebay is considered the primary recharge area for the groundwater basin and is located adjacent to the hills, which form the perimeter of the basin to the west, south, and east. The confined area, as defined by the presence of the regional aquitard, makes up the largest portion of the groundwater basin, occupying the central and northern portion of the basin. The USAR Center is located in the confined portion of the basin. Depth to groundwater in the upper aquifer (unconfined) near the USAR Center is reported in the Lowney Associates report to be approximately 14-16 feet below ground surface (bgs). Three hydrostratigraphic zones comprise the confined area: (1) the upper aquifer zone, (2) the regional aquitard, and (3) the lower aquifer zone. The upper aquifer zone is composed of Holocene aged alluvial deposits including the young bay mud, older bay mud, and Quaternary alluvial sediments less than 50 feet thick. This zone is characterized by irregular bedding and interfingering fine and coarse grained materials. Individual beds show highly variable lateral distributions and vertical thicknesses. Some stream channel deposits may be continuous for hundreds of feet along their longitudinal axes, but narrow and completely contained as lenses within materials. Hydraulic conductivity in the upper aquifer is highly variable.

According to a previous Phase I Environmental Site Assessment (Section 3.5.4), groundwater in the area flows generally in a westerly direction.

2.5 SITE UTILITIES

Water Service – Santa Clara County provides potable water service to the Site.

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

Gas & Electric – Pacific Gas & Electric (PG&E) provides natural gas and electric service to the Site.

There were two solid waste dumpsters on the Site between the storage building and OMS building. According to Site personnel, the dumpsters are serviced once a week by BFI.

2.6 WATER SUPPLY WELLS & SEPTIC SYSTEMS

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

A search of Federal and State water well databases in the EDR report identified five water supply sources located within approximately 1 mile of the Site.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Land titles for the Site were reviewed back to 1948. Appendix C contains a chain of title report completed for the Site. According to the chain of title documentation, the United States of America purchased the land for the Site in May 1950 from Santa Clara County, who acquired the land from Henry Franco and Joseph Franco, (doing business as Franco Bros. Cash & Carry Market) in June 1948. The chain of title report did not identify any leases or environmental liens against the USAR Center. It was confirmed at the time of the 2006 Site visit that the USAR is allowing the GSA to utilize one of its POV areas for parking. According to the EDR Report, no Sanborn fire insurance maps were available.

Available business directories including City, cross-reference, and telephone directories were reviewed, if available, at approximately five-year intervals for the years spanning 1922 through 2001 (Appendix E). The address of the USAR Center was first listed in the research source (Polk's City Directory and Robinson's City Directory) in 1966. Prior to 1966 city directories do not list the Site. Historical documentation supports the 1953-1954 construction date of the USAR Center.

3.2 PAST USES AND OPERATIONS

In 1950, the U.S. Government purchased the 8.60 acres of land for construction of the USAR Center. Construction of the administration building, the storage/arms vault building, and the OMS building occurred in 1953-1954. Historical information sources suggest that the Site was undeveloped and used as an agricultural field prior to 1950. The Site has served as a reserve and mobilization center for the U.S. Army Reserve since the U.S. Government acquired the land.

The Site primarily functioned as an administrative, logistical, and educational facility, with limited maintenance of military vehicles occurring in the OMS building. The Site was historically used by reservists for drill activities on various weekends throughout the year.

The OMS building was used to perform limited maintenance activities on military equipment. Activities inside the OMS building were limited to preventative maintenance checks, including checking vehicle fluids such as motor oil, water, and antifreeze, and light maintenance activities. Any equipment requiring heavier maintenance activities was sent to an Area Maintenance Support Activity (AMSA) shop located in Oakland, California.

At the time of the 2006 Site visit, the OMS building contained approximately five 25-gallon drums for used absorbents, used oil, used antifreeze and a device used to crush

used oil filters (Plate 27 in Appendix B). The waste derived from the level 1 type maintenance (tire changes, fluid changes, etc.) are stored in a secondary containment unit until such time the containers were filled and moved to the appropriate hazardous waste storage cabinets; which are then picked up by a company designated through the Defense Reutilization and Marketing Organization Hazardous Waste Agreement (DRMO HW).

According to an Environmental Baseline Survey report (Section 3.5.8), a former OWS and wash rack were located in the northeast portion of the Site, and were decommissioned by Harding Lawson and Associates in August 2000.

According to a previous Phase I Environmental Site Assessment (Section 3.5.4), a former fueling station was located northwest of Building 102. The fueling structure and associated UST were removed in 1993.

A review of historical topographic maps corroborates the historical information provided for the Site. The maps show the property occupied by the USAR Center from the earliest topographic map available (1953) until the latest topographic map available (1980). Copies of the available historical topographic maps are included in Appendix A, Figures 9-13.

Aerial photographs provided by EDR from 1939, 1956, 1965, 1974, 1982, 1993 and 1998 were reviewed to evaluate past uses of the Site (Figures 14 - 20 in Appendix A).

The 1939 aerial photograph (Figure 14 in Appendix A) shows the Site and surrounding areas without any structures; and the land appears to have been used for agricultural purposes.

The 1956 aerial photograph (Figure 15 in Appendix A) shows the buildings on the Site in the same location as they exist today. Adjacent property to the east and south still appear to have an agricultural use. Undeveloped land borders the Site to the west and north.

The 1965 aerial photograph (Figure 16 in Appendix A) shows the Site in generally the same condition as the 1956 photograph. Surrounding properties to the east and south have been developed with a parking lot and several larger structures.

The 1974 and 1982 aerial photographs (Figures 17 and 18 in Appendix A) show the Site and surrounding areas generally in the same condition as the 1965 photograph. One exception is the property to the west of the Site, which is shown being used as a parking lot.

The 1993 and 1998 aerial photographs (Figures 19 and 20 in Appendix A) show the Site and surrounding area are generally in the same condition as they exist today; with the

multi-level parking garage to the west, Santa Clara County Parking lot to the east, the Santa Clara County Jail System to the south, and the Valley Transit Authority to the north.

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

3.3.1 Past Use and Storage of Hazardous Substances

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

Historically the OMS has been utilized to conduct general maintenance of military vehicles. Previous environmental investigations at the Site have focused on unauthorized releases to the environment at the former wash rack which was located northeast of the OMS building and at a grease rack that has been reportedly out of use since about 1986. Environmental investigative reports related to these structures are included in Appendix D. A final Preliminary Assessment of these structures was submitted to the California Department of Toxic Substances Control (DTSC), in December 1999. The only contaminants of potential concern were the metals thallium and arsenic, which were detected in several soil samples at concentrations exceeding the U.S. EPA's Preliminary Remediation Goals (PRGs). On February 11, 2003, the DTSC issued a No Further Action (NFA) letter for these areas stating that there is no suspected source of release for arsenic or thallium (presumed to be background levels) from the former wash rack or grease rack. The letter goes on to state that there is no evidence of a release for more likely constituents such as volatile organic compounds (Section 3.5.6).

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. There is no documentation that CERCLA hazardous substances were stored at the Site for 1 year or more in excess of corresponding reportable quantities.

3.3.2 Past Disposal and Release of Hazardous Substances

Information related to past disposal and potential release of hazardous substances at the Site was compiled through review of available Site records, search of Federal and State environmental databases, and interviews with Army Reserve personnel. According to Army Reserve personnel and Site records, there has been no on-site disposal or release of hazardous substances above reportable quantities at the Site. No stained soil or stressed vegetation was observed during the August 2006 Site visit. Additionally, the MEP area and the POV parking area did not show any signs of staining, and no noxious or foul odors were noted. The USAR Center has a contract

through the DRMO HW to transport and dispose of all hazardous waste associated with the daily operations. Additionally, the OWS is cleaned by EnviroMedial Services every six months. Waste, associated with the OWS cleaning, is drummed and stored in the appropriate hazardous waste storage cabinet until the contracting company through DRMO HW picks up for disposal.

3.4 PAST PRESENCE OF BULK PETROLEUM STORAGE TANKS

Based upon a review of available Site records, a search of Federal and State environmental databases, Site reconnaissance and interviews with Army Reserve personnel there are no USTs or aboveground storage tanks (ASTs) currently located on the Site. Historically, one 1,000-gallon diesel UST had been located on the Site. According to the EDR report and documentation provided by the 63rd RRC, a UST release was reported in January 1992. Tank removal and remediation activities were conducted in April 1993. According to UST removal documentation cited in a 2003 Environmental Baseline Survey report (Section 3.5.8), only soil was impacted by the UST release, and the impacted soil was stockpiled and removed for disposal. Leaking underground storage tank (LUST) activities were "Closed" with the State in October 1995, and the Site was placed on the historic LUST database.

3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

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

3.5.1 Radon Report for 63rd RRC Reserve Centers, August 23, 1994

A site specific radon survey was conducted for the Site between December 1993 and July 1994. Radon levels ranged from 0.10 to 3.2 picoCuries per liter of air (pCi/L), which is below the United States Environmental Protection Agency (USEPA) recommended action level of 4 pCi/L.

3.5.2 Indoor Firing Range Closure Documents, Navy Public Works, November 3, 1994, 63rd RRC

According to this report, summarized in 2006 Environmental Baseline Survey, the firing range that was located in the basement of the administration building was remediated in 1994. After remediation was completed, four confirmatory lead wipe samples were collected on September 28, 1994. Lead was detected in only one sample at 28 micrograms per square foot ($\mu\text{g}/\text{sf}$), which exceeds the current Occupational Safety and Health Administration's (OSHA's) action level of 5 $\mu\text{g}/\text{sf}$. However, the report states that the IFR was remediated to Title 29 CFR 1910.1025 standards in 1994, and was cleared for re-entry by Code 957 Environmental Section, Navy Public Works, San Francisco

Bay on November 3, 1994. The former firing range is currently used for unit storage. (Note: This report is not in Appendix D. The summary of the report can be found in the 2006 Environmental Baseline Survey Report, Section 3.5.8).

3.5.3 Final Closure Letter Report for the Removal of the UST, Harding Lawson Associates, August 3, 2000

This document is the letter report required by the State to close the LUST issue for the Site.

3.5.4 Phase I Environmental Site Assessment, George L. Richey USAR Center, URS Corporation, July 26, 2002

This report provides information on possible releases to the environment at the former wash rack site; the UST removal that occurred on the Site in 1993; hazardous material use on the Site; the contamination migration from the Santa Clara County Maintenance Garage, and the heavy metal contamination issue associated with the wash rack closure.

3.5.5 Renewal of License (DACA 05-3-97-600) to the Santa Clara County, CA for a Monitoring Well at the PVT George Richey Army Reserve Center, San Jose, CA; September 18, 2002

This is the renewal agreement between the Army and the County for two monitoring wells on the Site. The wells were installed to monitor a 1988 gasoline release from a former UST owned by Santa Clara County at the Maintenance Garage, located at 90 West Younger Avenue, adjacent to the Site. A total of 15 monitoring wells (12 on the Santa Clara County Garage property, one to the north of West Younger Avenue, and two on the Site) were installed to delineate the impacts to groundwater and plume migration.

3.5.6 Installation Restoration Program Decision Document to Support No Further Action (Grease Rack and Vehicle Wash Rack), 63rd RRC, March 2003

Previous environmental investigations at the Site have focused on potential releases to the environment at the wash rack, formerly located northeast of the OMS building, and at a grease rack, that has been reportedly out of use since about 1986. A final Preliminary Assessment of these structures was submitted to the DTSC, in December 1999. The only contaminants of potential concern were the metals thallium and arsenic, which were detected in several soil samples at concentrations exceeding the U.S. EPA's Preliminary Remediation Goals (PRGs). On February 11, 2003, the DTSC issued a NFA letter for these areas stating that there is no suspected source of release

for arsenic or thallium from the grease rack and there is no evidence of a release for more likely constituents such as volatile organic compounds.

3.5.7 2005 Annual Groundwater Monitoring Report, Civic Center Garage (Santa Clara County Maintenance Garage); Lowney Associates, October 17, 2005

This report gives information on the monitoring wells found on Site. According to the report, depth to groundwater in the monitoring wells ranged from 13 to 14.5 feet bgs. Groundwater flow has been consistently toward the west (in the direction of the Site). Groundwater sampling results indicated low levels of petroleum hydrocarbons (<50ppb) have impacted groundwater beneath the northeast corner of the Site, but not in concentrations which exceed CRWQCB action levels.

3.5.8 Environmental Baseline Survey (EBS), George L. Richey USAR Center (CA069); Installation Management Agency, USAR, January 30, 2006

This 2006 report was prepared to document environmental conditions of the Site and previous environmental studies.

The report addressed the former 1,000 gallon diesel LUST, as well as the petroleum impacts from the Santa Clara County Garage (Sections 3.5.3 and 3.5.7).

In addition to the reports listed above, the 2006 EBS also summarizes an asbestos survey and report that was performed on the Site in 2001 by ITI of South Florida, Inc. Asbestos containing materials (ACMs) were identified in all three buildings at the Site. Friable ACMs were identified in the administration and OMS buildings (paper pipe insulation, mud fittings, joint compound, and wallboard). The survey concluded that an imminent asbestos hazard was not present at the facility; however, a recommendation was made to develop and implement an Operation and Maintenance (O&M) Plan for all known and suspect ACM. According to a contract environmental manager for the 63rd RRC, an O&M Plan is currently in place for all known and suspect ACM on the Site.

Lastly, the report concluded that a lead based paint (LBP) survey for structures at the Site was needed.

4.0 ADJACENT PROPERTIES

Figure 20 in Appendix A provides a 1998 aerial view of the Site and adjacent properties. The Site is bordered by West Younger Avenue to the north, San Pedro Street to the east, and West Hedding Street to the south. The VTA lies north of West Younger Avenue, a maintenance garage and parking lot owned by Santa Clara County lies east of San Pedro Street, and the Santa Clara County Jail and Courthouse lies south of West Hedding Street. To the west lies a multi-level parking garage owned by the City of San Jose, a National Guard Building, and a parking area for the VTA. Table 1 provides a list of adjacent properties, their directional location in regards to the Site, as well as the current zoning. Plates 28 and 32 in Appendix B provide views of adjacent properties and surrounding land use.

TABLE 1 LIST OF ADJACENT PROPERTIES			
Direction From Site	Name/Type of Property	Address	Zoning
North	Valley Transit Authority	No address available	R-1-8 Single Family Residential
South	Santa Clara County Jail and Courthouse	191 North First Street San Jose, CA 95113	R-1-8 Single Family Residential
East	Santa Clara County Maintenance Garage and Parking lot	90 West Younger Avenue	R-1-8 Single Family Residential
West	City of San Jose Parking Garage National Guard Building VTA parking lot	200 East Santa Clara Street No address available St. James/First Streets	R-1-8 Single Family Residential

Appendix A and Appendix E provide historical aerial photographs, topographic maps, and EDR Reports, which were used to evaluate any potential environmental impacts on the Site by adjacent properties. Land use at adjacent properties does not appear to have changed significantly since 1982. Due to the flat lying nature of the area, and the fact that none of the adjacent properties had any noticeable outside storage of liquid chemicals (e.g., drums or uncovered hazardous waste storage areas) at the time of the 2006 Site reconnaissance, it does not appear that storm water runoff from the adjacent properties would impact the environmental conditions of the Site. However, as previously mentioned, Santa Clara County Maintenance Garage is identified on the LUST database as having a release with a migratory plume. Based on the LUST activities on the adjacent site, the USAR Center has existing monitoring wells for annual monitoring of the migratory plume.

5.0 REVIEW OF REGULATORY INFORMATION

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

Based on a review of the 7.5-minute USGS topographic map and previous environmental reports provided by the 63rd RRC, groundwater flow in the vicinity of the Site has been estimated toward the west, in the direction of the Guadalupe River.

5.1 FEDERAL ENVIRONMENTAL RECORDS

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

TABLE 2 FEDERAL DATABASE SEARCH								
Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total Plotted
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
Delisted NPL	1.000		0	0	0	0	NR	0
NPL Recovery	TP		NR	NR	NR	NR	NR	0
CERCLIS	0.500		0	0	0	NR	NR	0
CERC-NFRAP	0.500		0	0	0	NR	NR	0
CORRACTS	1.000		0	0	0	2	NR	2

**TABLE 2
 FEDERAL DATABASE SEARCH**

Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total Plotted
RCRA TSD	0.500		0	0	0	NR	NR	0
RCRA Lg. Quantity Gen	0.250		0	0	NR	NR	NR	0
RCRA Sm. Quantity Gen	0.250	X	0	4	NR	NR	NR	4
ERNS	TP		NR	NR	NR	NR	NR	0
HMIRS	TP		NR	NR	NR	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
DOD	1.000		0	0	0	0	NR	0
FUDS	1.000		0	0	0	0	NR	0
US Brownfields	0.500		0	0	0	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
ROD	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0

TABLE 2 FEDERAL DATABASE SEARCH								
Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total Plotted
ICIS	TP		NR	NR	NR	NR	NR	0
PADS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
MINES	0.250		0	0	NR	NR	NR	0
FINDS	TP	X	NR	NR	NR	NR	NR	0
RAATS	TP		NR	NR	NR	NR	NR	0

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

5.1.1 RCRA Corrective Action (CORRACTS) Sites within 1.0-Mile

RCRA corrective action (CORRACTS) sites represent facilities that have generated or managed hazardous wastes and require corrective action. According to the EDR report, the USAR Center is not a CORRACTS site. Two facilities were identified within the 1-mile ASTM search radius of the Site on the CORRACTS list. The facilities are as follows:

- Gordon Biersch Brewing Company
 357 East Taylor Street
 Approximately 4,237 feet east of the Site
 One noted violation
- Safety Kleen Corporation
 1147 North 10th Street
 Approximately 4,969 feet northeast of the Site
 Ten noted violations

Based on the distance of these facilities (approximately 1-mile) from the Site and the regulatory status of the corrective action underway, these facilities do not appear to pose an environmental risk to the Site at this time.

5.1.2 Federal RCRA Small and Large Quantity Generators List within ¼ - Mile

Conditionally exempt small quantity generators (CESQGs) are defined as facilities generating less than 100 kilograms (kg) of hazardous waste, or less than 1 kg of acutely hazardous waste per month. RCRA small quantity generators (SQGs) are defined as facilities generating between 100 kg and 1,000 kg of hazardous waste per month, while a large quantity generator is defined as a facility generating more than 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month.

According to the EDR report, the USAR Center is listed as a RCRA-SQG and does not show any violations.

Four additional facilities were identified within ¼-mile of the Site as RCRA-SQGs. No large quantity generators are situated within ¼-mile of the Site.

The RCRA-SQG facilities are as follows:

- Municipal Garage City of San Jose
825 North San Pedro Street
Approximately 991 feet southeast of the Site
No violations
- San Jose Police Department
201 West Mission Street
Approximately 1,064 feet southeast of the Site
No violations
- OMS #38
251 West Hedding Street
Approximately 820 feet southwest of the Site
No violations
- Santa Clara County Garage
90 West Younger Avenue
Adjacent to the Site to the east
No violations

None of these four facilities show any violations associated with site activities; therefore, they do not pose an environmental risk to the Site, in association with their RCRA-SQG activities.

In addition, the Police Department, and OMS #38 are either located hydraulically side-gradient or down-gradient of the Site (assuming a general northwesterly groundwater

flow direction in the vicinity of the Site) and therefore do not pose an environmental risk to the Site.

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

The FINDS List contains both facility information and “pointers” to other sources that contain more detail. The USAR Center was identified on this database in association with its RCRA-SQG activities, even though there have been no violations in association with said activity.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented in Table 3 was obtained from the EDR regulatory database search report.

TABLE 3 STATE DATABASE SEARCH								
Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total Plotted
AWP	1.000	X	1	0	0	0	NR	1
Cal-Sites	1.000	X	1	0	0	0	NR	1
CA Bond Exp. Plan	1.000		0	0	0	0	NR	0
NFA	0.250		0	0	NR	NR	NR	0
NFE	0.250		0	0	NR	NR	NR	0
REF	0.250		0	0	NR	NR	NR	0
SCH	0.250		0	0	NR	NR	NR	0
Toxic Pits	1.000		0	0	0	0	NR	0
State Landfill	0.500		0	0	0	NR	NR	0
CA WDS	TP	X	NR	NR	NR	NR	NR	0
WMUDS/SWAT	0.500		0	0	0	NR	NR	0
Cortese	0.500	X	0	4	5	NR	NR	9

**TABLE 3
 STATE DATABASE SEARCH**

Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total Plotted
SWRCY	0.500		0	0	0	NR	NR	0
LUST	0.500	X	0	4	6	NR	NR	10
CA FID UST	0.250		0	0	NR	NR	NR	0
SLIC	0.500		0	0	0	NR	NR	0
HIST LUST	0.500	X	0	4	6	NR	NR	10
UST	0.250		0	2	NR	NR	NR	2
HIST UST	0.250		1	8	NR	NR	NR	9
AST	0.250		0	0	NR	NR	NR	0
SAN JOSE HAZMAT	0.250		0	0	NR	NR	NR	0
SWEEPS UST	0.250		0	0	NR	NR	NR	0
CHMIRS	TP		NR	NR	NR	NR	NR	0
Notify 65	1.000		0	0	0	1	NR	1
DEED	0.500		0	0	0	NR	NR	0
VCP	0.500		0	0	0	NR	NR	0
DRYCLEANERS	0.250		0	0	NR	NR	NR	0
WIP	0.250		0	0	NR	NR	NR	0
CDL	TP		NR	NR	NR	NR	NR	0
HAZNET	TP	X	NR	NR	NR	NR	NR	0
EMI	TP		NR	NR	NR	NR	NR	0

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

5.2.1 California DTSC's Annual Workplan (AWP) Sites within 1 - Mile

AWP sites are known hazardous substance sites targeted for cleanup by the California Environmental Protection Agency, DTSC.

According to the EDR report, the USAR Center is listed as an AWP site because of the wash rack issue, which has since received a NFA status, certified by the DTSC.

One additional facility was identified within the 1-mile ASTM search radius of the Site. The AWP facility is as follows:

- Santa Clara County Jail
180 West Hedding Street
Adjacent to the Site to the south
polychlorinated biphenyl (PCB) impacted soils

Soils were removed in from the Santa Clara County Jail location in 1983. The status of the facility is listed as NFA.

This facility is located hydraulically side-gradient of the Site and does not appear to pose an environmental risk to the Site.

5.2.2 State-Registered California Sites (Cal-Sites) Within 1 - Mile

The Cal-Site database contains potential or confirmed hazardous substance release properties.

The USAR Center is listed as a Cal-Site because of the wash rack issue, which has since received a NFA status.

One additional facility was identified within the 1-mile ASTM search radius of the Site:

- Santa Clara County Jail
180 West Hedding Street
Adjacent to the Site to the south
PCB impacted soils

The PCB impacted soils were remediated in 1983 and is certified as NFA status by the DTSC.

This facility is located hydraulically side-gradient of the Site, and does not appear to pose an environmental risk to the Site.

5.2.3 California Waste Discharge System (CA WDS) – Target Property

The Site was identified as having California Waste Discharge requirements. The USAR Center utilizes the municipal sanitary sewer system to treat wash water associated with the vehicle wash pad and OWS. The National Pollutant Discharge Elimination System (NPDES) permit number is CAS000001. Based upon the 2006 Site reconnaissance, the current vehicle wash pad and associated OWS appeared to be in good condition with no visible staining. The system appears to have no immediate potential as an environmental risk to the Site.

5.2.4 Hazardous Waste & Substances Sites List (Cortese) Within ½ - Mile

The “Cortese” Hazardous Waste & Substances Sites database identifies public drinking water wells with detectable levels of contamination, hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program, sites with USTs having a reportable release, and all solid waste disposal facilities from which there is known migration.

The USAR Center is listed on the Cortese database because it is an active facility that discharges seasonal/continuous waste water under discharge requirements. Based on Site activities, the discharge of wash water to the sanitary sewer appears to have no immediate potential as an environmental risk to the Site.

Nine other facilities were identified within the ½-mile ASTM search radius of the Site. Only three of the nine facilities are located topographically higher or equivalent to the USAR Center:

- San Jose Police Garage
825 San Pedro Street
Approximately 962 feet southeast of the Site
No additional information
- Old Communications Building
171 West Mission Street
Approximately 1,181 feet southeast of the Site
Soil impacted with diesel fuel, case closed
- Licon Property
705 North 2nd Street
Approximately 2,477 feet southeast of the Site
Soil impacted with gasoline fuel, case closed

These facilities are located hydraulically side-gradient to the Site, and do not appear to pose an environmental risk at this time.

5.2.5 State-Registered LUST Sites within ½ - Mile

The LUST Incident Report contains an inventory of reported leaking UST incidents. The data comes from the State Water Resources Control Board LUST Information System. Ten LUST facilities were identified within the ½-mile ASTM search radius of the Site.

The USAR Center is listed on the LUST data base related to the former UST on the Site (Section 3.4). Out of the ten facilities listed, only four are located topographically higher or equivalent to the Site. Three of these facilities, the Municipal Garage, Old Communications Building, and the Licon Property have been discussed in previous sections.

The remaining facility is as follows:

- Santa Clara County Maintenance Garage
90 West Younger Avenue
Adjacent to the Site to the east

A previously discussed report (Section 3.5.7) identified 15 monitoring wells (two on the Site) installed related to a gasoline release at this facility that occurred in 1988. The release resulted in impacts to the groundwater. Based on groundwater elevation data collected during the assessment activities, groundwater flow has been moving in a westerly direction toward the Site. The two monitoring wells on the Site are sampled every six months, and 2005 laboratory results indicated that low concentrations of petroleum hydrocarbons (TPH) and the fuel additive methyl tertiary-butyl ether (MTBE) have impacted the groundwater beneath the northeast corner of the Site. Post remedial action monitoring is still in progress. This past release of petroleum contamination into the groundwater and the potential migration of the contamination plume toward the Site constitute a recognized environmental condition.

5.2.6 Santa Clara County Historical LUST Sites within ½ - Mile

The Santa Clara County Historical LUST database is a list of open and remediated or “closed” leaking underground storage tank sites. Although the county no longer updates the listings, the database is still maintained by the Department of Environmental Health. The Historical LUST listings, according to the EDR report, identifies ten facilities within the ½-mile ASTM search radius. The USAR Center is identified in Historical LUST database related to the former UST on the Site; however, the status of the LUST listing was closed in 1995. Out of the ten (10) facilities listed, only four are located topographically higher or equivalent to the Site. These facilities, the Municipal Garage, the Old Communications Building, the Licon Property, and the Santa Clara County Maintenance Garage, have all been discussed previously.

5.2.7 State-Registered UST Sites within ¼ - Mile

Two facilities were identified within the ¼-mile ASTM search radius as having a registered UST on their property.

The USAR Center no longer has a registered UST on the Site.

The Municipal Garage and the Old Communications Building were identified, both of which have been discussed previously in Sections 5.1.2, 5.2.4 and 5.2.5.

5.2.8 State-Registered Historical UST Sites within ¼ - Mile

Nine facilities were identified within the ¼-mile ASTM search radius of the Site.

The USAR Center is not identified on this database listing, although a UST did previously exist on the Site. Out of the 9 facilities listed, only four are located topographically higher or equivalent to the Site. Two of these facilities, the Municipal Garage and Old Communications Building, have been discussed previously in Sections 5.1.2, 5.2.4 and 5.2.5. The remaining facilities are as follows:

- Main Jail
180 West Hedding Street
Approximately 327 feet southwest of the Site
- Police Building Generator
201 West Mission Street
Approximately 1,160 feet southeast of the Site

Neither of the facilities is listed on the LUST or Historical LUST databases. Both of these facilities are located hydraulically side-gradient to the Site, and do not appear to pose an environmental risk at this time.

5.2.9 Proposition 65 Notification Sites within 1 - Mile

One facility was identified within the 1-mile ASTM search radius of the Site on the Proposition 65 Notification Records. This list contains facility notifications about any release which could impact drinking water, and thereby expose the public to a potential health risk. The facility is as follows:

- Aratex Services
855 McKendrie Street
Approximately 4,908 feet southwest of the Site
No additional information

This facility is located hydraulically down gradient to the Site, and does not appear to pose an environmental risk at this time.

5.2.10 Facility and Manifest Data (HAZNET) – Target Property Search

HAZNET data is extracted from copies of hazardous waste manifests received each year by the DTSC.

The USAR Center was identified on the HAZNET database. The database identifies waste manifests for “waste oil and mixed oil”, “other inorganic solid waste” and “unspecified oil containing waste”. These waste streams all seem to correspond with daily operations of the facility, and indicate that the associated waste is being transported for proper disposal.

5.3 TRIBAL ENVIRONMENTAL RECORDS

The regulatory information presented in Table 4 was obtained from the EDR regulatory database search report.

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

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

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

5.4 EDR PROPRIETARY RECORDS

The regulatory information presented in Table 5 was obtained from EDR's Proprietary Records database search report.

TABLE 5 EDR PROPRIETARY DATABASE SEARCH								
Database	Search Distance (miles)	Target Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	>1	Total Plotted
Manufactured Gas Plants	1.000		0	0	0	0	NR	0
EDR Historical Auto Stations	0.250		0	0	NR	NR	NR	0
EDR Historical Cleaners	0.250		0	1	NR	NR	NR	1

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

5.4.1 EDR Historical Cleaner Sites within 1/4-mile

One facility was identified within the 1/4 - mile ASTM search radius of the Site on the EDR Historical Dry Cleaners list. EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The facility is as follows:

- Model Cleaners
 160 West Younger Avenue
 Approximately 1,077 feet northeast of the Site

Model Cleaners is located topographically lower than the USAR Center, and does not appear to pose an environmental risk at this time.

5.5 STATE AGENCIES CONTACTED

The Santa Clara Valley Water District-Records Request, located at S750 Almaden Expressway, San Jose, CA 95118, was contacted on August 10, 2006, to obtain any Site specific information. No response was provided prior to the issuance of this report.

5.6 UNMAPPED SITES

The EDR database search yielded twenty-five (25) unmapped sites. Unmapped sites are those with insufficient address information such that they can only be identified as

within the zip code of the target property. Every effort was made to locate these sites and assess their relevance to this ECP report. Further research was conducted using the mapping utility provided at maps.google.com. The locations of all orphaned sites were identified and mapped. None of the orphaned sites are located within the corresponding ASTM search radius distance.

5.7 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO THE SITE

To summarize Subsections 5.1 through 5.6, 27 separate properties, in addition to the USAR Center, were evaluated as potential risk properties to the Site. The properties are listed below in Table 6.

TABLE 6 PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
Santa Clara County Jail	Cal-Sites AWP	Equal	Low	PCB soil remediation granted NFA & Certified by DTSC
Main Jail	HIST UST	Equal	Low	No Releases
Administration Bldg- East Wing	HIST UST	Lower	Low	No Releases
OMS #38	RCRA-SQG FINDS HAZNET HIST UST	Lower	Low	No RCRA Violations
San Jose OMS/Military	LUST HIST UST/LUST	Lower	Low	LUST Case Closed
Juvenile Detention	HIST UST	Lower	Low	No Releases
San Jose Police Garage	Cortese	Higher	Low	No Information
Municipal Garage	LUST UST HIST UST/LUST	Higher	Low	LUST Case Closed
Municipal Garage City of San Jose	RCRA-SQG FINDS HAZNET	Higher	Low	No RCRA Violations
San Jose Police Dept.	RCRA-SQG FINDS HAZNET	Higher	Low	No RCRA Violations
Model Cleaners	EDR HIST Cleaners	Lower	Low	No Information
Police Building Generator	HIST UST	Higher	Low	No Release
Old Communications Building	HAZNET HIST LUST/LUST	Higher	Low	LUST Case Closed

**TABLE 6
 PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS**

Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
	Cortese			
Communication Bldg	HIST UST/UST	Higher	Low	No Release
Santa Clara County Maintenance Garage	RCRA-SQG FINDS HAZNET HIST LUST/LUST	Lower	High	No RCRA Violations LUST post remedial activities-GW impacted NE corner of USAR Center
Santa Clara County Civic	Cortese	Lower	Low	No Information
D.G.S. Garage	HIST UST	Lower	Low	No Release
Unocal Station #5954	HIST LUST/LUST	Lower	Low	Preparing Remediation Plan
Chevron #9-2462	HIST LUST/LUST Cortese	Lower	Low	LUST Case Closed
Shell	HIST LUST/LUST	Lower	Low	Remedial Action (cleanup) underway
SJ Airport Maintenance Area	Cortese HAZNET HIST LUST/LUST San Jose HAZMAT	Lower	Low	LUST Pollution Characterization
San Jose Airport/Chevron	HAZNET HIST LUST/LUST CHMIRS, Cortese	Lower	Low	LUST Remedial Action (cleanup) Underway
Winingar, Richard & Jeane	Cortese	Lower	Low	No Information
Licon Property	HIST LUST/LUST Cortese	Equal	Low	LUST Case Closed
Gordon Biersch Brewing Company	CERCLIS RCRA-SQG FINDS Cortese CORRACTS San Jose HAZMAT HIST UST/UST HIST LUST/LUST	Higher	Low	Not on NPL List; CERCLIS site status-deferred to RCRA; Facility assigned Med. – corrective Action priority; One RCRA Violation; LUST Status listed as Pollution Characterization began in 1990 and no remediation plan reported.
ARATEX Services	NOTIFY 65	Higher	Low	No Information
Safety Kleen Corp	FINDS	Lower	Low	RCRA 10 Violations

TABLE 6 PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
	RCRA-LQG RCRA-TSDF CORRACTS			CA has prioritized the facility as a low corrective action priority

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

Based on an evaluation of available information and details concerning the properties listed in Table 6, the Santa Clara County Maintenance Garage is classified as a “High Risk” property. “High Risk” properties are those that exhibit significant environmental conditions that have the probability of adversely affecting environmental conditions at another site. The Santa Clara County Maintenance Garage has impacted groundwater under the northeast corner of the USAR Center (Section 3.5.7).

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

Findings documented in the following subsections are based on the August 11, 2006 Site inspection and area reconnaissance, a review of available Site records, and information obtained from U.S. Army Reserve personnel.

6.1 ABOVEGROUND STORAGE TANKS

A visual inspection was undertaken to locate any ASTs on the Site. Based on a visual inspection and an interview with 63rd RRC personnel, there are no ASTs currently located on the Site. Additionally, there is no historical information about past AST use at the Site.

A visual inspection was undertaken to locate ASTs on properties adjacent to the Site. No ASTs were noted on adjacent properties.

6.2 ASBESTOS CONTAINING MATERIAL

A 2001 asbestos survey prepared by ITI of South Florida, Inc. and summarized in the 2006 EBS (Section 3.5.8) indicated that ACMs were identified in all three buildings at the Site. The Site has an O&M program to deal with friable ACMs where identified in the administration building and OMS (paper pipe insulation, mud fittings, joint compound and wallboard). Additionally, during the Site visit the former firing range located in the basement of the administration building contained sound proofing material which lined the walls and ceiling. It is not known if this material was sampled in the asbestos survey. According to Site representatives, this material has not been included as part of the O&M program.

6.3 HYDRAULIC EQUIPMENT

Hydraulic equipment, such as hydraulic lifts that may incorporate oil reservoirs, were not observed during the Site visit. No historical use of this equipment was indicated by Site personnel.

6.4 INVENTORY OF CHEMICALS / HAZARDOUS SUBSTANCES

Based on the 2006 Site visit, the only materials that are being stored at the Site are those chemicals associated with vehicle and facility maintenance activities, and janitorial services. Janitorial chemicals and building maintenance-related products were noted as being stored in the designated storage area within the janitorial closet located in the administration building. Vehicle maintenance products and small amounts of petroleum, oil, and lubricant (POL) products were also stored within designated areas within the OMS building.

Four hazmat sheds were observed west of the OMS in the MEP area. The sheds, however, were locked and not inaccessible. A Site representative stated that the four sheds were designated for specific purposes and are identified as H-1, H-2, H-3 and H-4.

- H-1 contained grease, lubricants, fresh oil, antifreeze (unused products for type 1 level maintenance)
- H-2 contained 5-gallon containers of diesel fuel
- H-3 contained acetylene compressed tanks for hot works
- H-4 contained used/waste oils, antifreeze, used spill kit materials (absorbent booms)

Each of the sheds was equipped with secondary containment and appeared in good condition at the time of the Site reconnaissance. There is no indication based on the Site visit that CERCLA hazardous substances are currently being stored at the Site in excess of corresponding reportable quantities.

A storage room located in the OMS building contained a vehicle battery storage area, which also housed a decontamination shower station. This room is used to store new and used batteries and employs a "one for one" exchange program (one new battery exchanged for one old battery). At the time of the 2006 Site visit no batteries were being stored. A floor drain was noted in the battery room that was associated with the shower station. The floor drain is reportedly tied into the municipal sanitary system. Additionally, a small room in the northwest corner of the OMS building contained an air compressor unit utilized for maintenance air tools. The room was in order and no visible staining was noted on the floor of the room or near the drain.

At the time of the Site visit, the OMS building contained approximately five 25-gallon drums for used absorbents, used oil, used antifreeze, and a device used to crush used oil filters (Plate 27 in Appendix B). Wastes derived from maintenance activities (tire changes, fluid changes, etc.) are stored in secondary containment units until such time the containers are filled. The containers are then moved to the appropriate hazardous waste storage cabinets, which are picked up by a company designated through the DRMO HW.

No improper storage techniques or staining were noted at the time of the Site visit. In addition, no violations were noted in the EDR report with regards to the USAR Center's management of hazardous waste.

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. There is no documentation that CERCLA hazardous substances were stored at the Site for 1 year or more in excess of corresponding reportable quantities.

6.5 INDOOR FIRING RANGE

An IFR was formerly present in the basement of the administration building. Based on documentation provided by the 63rd RRC (Section 3.5.2), the firing range was cleaned and all sand and dust was removed from the former range. The former firing range area is currently used for storage.

6.6 LEAD-BASED PAINT

A LBP survey has not been conducted for the buildings on the Site. Based on the construction date of the buildings (prior to 1978), it is presumed that lead based paint exists in the structures. During the 2006 Site visit, all painted surfaces appeared in satisfactory condition.

6.7 MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

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

6.8 NEARBY PROPERTIES

The Santa Clara County Maintenance Garage is identified on the LUST database as having a release with a migratory plume. Based on the LUST activities on the adjacent site, the USAR Center has two existing monitoring wells for annual monitoring of the migratory plume. Based on groundwater elevation data collected during the assessment activities, groundwater flow has been moving in a westerly direction toward the Site. In 2005, laboratory results indicated that low concentrations of petroleum hydrocarbons (TPH) and the fuel additive MTBE have impacted the groundwater beneath the northeast corner of the Site (Section 3.5.7). According to the EDR report post remedial action monitoring is still in progress. This past release of petroleum contamination into the groundwater and the potential migration of the contamination plume toward the Site constitute a recognized environmental condition.

6.9 OIL/WATER SEPARATOR

An OWS is currently located adjacent to an uncovered vehicle wash rack, situated between Buildings 101 and 102 (Plate 8 in Appendix B). According to Site personnel, this OWS is equipped with a stormwater diversion valve that directs vehicle wash water to the Santa Clara County sanitary sewer system. During large rain events, stormwater flows through the OWS and is directed to local storm drains.

6.10 PITS, SUMPS, DRYWELLS, AND CATCH BASINS

No visual or physical evidence of pits, sumps or drywells were discovered on the Site.

Two notable stormwater catch basins were identified during the Site visit, one adjacent to the OWS and one north of the OMS building. The catch basin north of the OMS building is where sampling for the NPDES permit is performed.

6.11 PCB CONTAINING TRANSFORMERS

Two pad-mounted, electrical transformer units are located on Site. Both transformers were noted to be in good condition, and no leaks were evident from the units during the August 2006 Site visit. According to a Site representative, the transformer to the east of the administration building is owned by PG&E, and the transformer located in the northeast parking area (GSA use area) is owned by the California Department of Agriculture. No PCB stickers were identified on the transformers, and it is unknown if PCB's are present.

According to Site personnel, the transformer owned by the California Department of Agriculture is used to supply power to a trailer that was providing oversight for the Med Fly Project in South Bay. They provided oversight for pesticide spraying over the south bay and into the southern central valley area. Site personnel also indicated that no pesticides were stored in the trailer, and that it is strictly an administrative trailer.

6.12 PCB CONTAINING EQUIPMENT

Based upon information provided by the 63rd RRC, there is no known PCB containing equipment within the buildings at the Site. PCBs, however, may be contained in light ballasts in older type light fixtures. Based on the construction date of the buildings, it is possible that some of these ballasts could potentially contain PCBs. Any light ballast not marked with "No PCBs" should be assumed to contain PCBs, and management and disposal of these light ballasts must be in accordance with local, State and Federal requirements.

6.13 PESTICIDES/HERBICIDES

Storage of larger than consumer sized pesticide/herbicide products was not observed during the Site visit.

6.14 RADIOACTIVE MATERIALS

U.S. Army radioactive commodities are managed at the Site. According to 63rd RRC personnel, the only radiological materials currently stored at the facility are chemical agent detectors. These items were secured in the Building 101 arms vault and in the basement of Building 100. USAR personnel indicated that to their knowledge the Site never had a Nuclear Regulatory Commission permit. Most military facilities will have some low level radiological materials associated with the illumination of various types of military equipment (e.g., watch dials, compasses, aiming circles, etc.). There is no evidence to suggest that radioactive commodities were ever improperly managed at the Site, or that any radionuclides within these sealed-source items were ever released.

6.15 RADON

A site specific radon survey was conducted for the Site between December 1993 and July 1994. Radon levels ranged from 0.10 to 3.2 pCi/L, which is below the USEPA recommended action level of 4 pCi/L.

6.16 UNDERGROUND STORAGE TANKS

Based on the 2006 Site visit, and information provided by the 63rd RRC, there are no USTs currently located on the Site. There was, however, one 1,000-gallon diesel UST located on the Site in the past.

According to the EDR report and documentation provided by the 63rd RRC, a UST release was reported for the Site in January 1992. Closure and tank removal activities were conducted in April 1993. Only soil was impacted by the release, and the case was considered "closed" by the State in October 1995.

A visual inspection was undertaken to locate USTs on properties adjacent to the Site. The Santa Clara County Maintenance Garage, located at 90 West Younger Avenue, is adjacent to the Site to the east across San Pedro Street. This facility is on the LUST list and has impacted groundwater under the northeast portion of the Site. The UST system can be visually located across San Pedro Street from the monitoring wells located on the northeast corner of the USAR Center within the GSA parking lot.

6.17 WASTE DISPOSAL ACTIVITIES

Solid waste is managed on-site in metal trash bins and picked up by a contractor. Non-hazardous waste management, such as used oil, is managed by the DRMO. No signs of landfills or unauthorized waste disposal practices were observed during the 2006 Site visit.

6.18 WASH RACK/ GREASE RACK

A wash rack, formerly located northeast of the OMS building, and a grease rack have reportedly been out of use since about 1986. A final Preliminary Assessment of these structures was submitted to the DTSC in December 1999. The only contaminants of potential concern were the metals thallium and arsenic, which were detected in several soil samples at concentrations exceeding the U.S. EPA's Preliminary Remediation Goals. On February 11, 2003, the DTSC issued a NFA letter for these areas stating that there is no suspected source of release for arsenic or thallium from the grease rack and there is no evidence of a release for more likely constituents such as volatile organic compounds.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

Figure 20 in Appendix A provides a 1998 aerial photograph of the USAR Center and surrounding properties and depicts current conditions to the area. The USAR Center is located in Santa Clara County, California, within the city limits of San Jose, California. The Site is located in a largely commercial land use.

The Site primarily functioned as an administrative, logistical, and educational facility, with limited maintenance of military vehicles occurring in the OMS building. The Site was historically used by reservists for drill activities on various weekends throughout the year.

7.2 COASTAL ZONE MANAGEMENT

According to the California Coastal Commission website, the Site is not located within a Coastal Zone Management Area (<http://www.coastal.ca.gov/index.html>).

7.3 WETLANDS

According to the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map, no jurisdictional wetland areas are identified on the Site or adjacent properties. The nearest wetland is located approximately $\frac{1}{8}$ mile west of the Site, and is associated with the Guadalupe River Basin. Figure 8 in Appendix A provides a map of wetlands in the immediate vicinity of the Site.

During the August 2006 Site visit, vegetation indicative of saturated areas was not observed at the Site.

7.4 100-YEAR FLOOD PLAIN

A review of the FEMA digital Flood Hazard Area map indicates that the Site lies outside the 100-year floodplain for Santa Clara County (Flood plain panel number 0603490019E). However, the Site does lie within the 500-year flood zone. Figure 8 in Appendix A provides a map of the 100-year and 500-year flood plain elevations located in the immediate vicinity of the Site.

7.5 CULTURAL RESOURCES

No Site specific survey addressing cultural resources was available for review. The Site was not identified in the National Register Information System database. However, because buildings at the Site are in excess of 50-years old, they could be eligible for the National Register of Historic Places.

8.0 CONCLUSIONS

Lawhon & Associates, Inc. in conjunction with FMSM was contracted to prepare an ECP report for the Pvt. George L. Richey USAR Center (CA069) located at 155 West Hedding Street, San Jose, Santa Clara County, California 95110. The tract is rectangular in shape and encompasses approximately 8.60 acres. The Site consists of three (3) permanent structures: an administration building (Building 100), a storage/arms vault building (Building 101), and an OMS building (Building 102).

The USAR Center is currently occupied by the 6045th Garrison Support Unit, 341st MP, and the 381st MP. The Site has served as a USAR Center since the United States Government acquired the Site in 1950. The United States of America owns the land and the buildings.

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

- **Asbestos Containing Materials** - A 2001 asbestos survey indicated that ACMs were identified in all three buildings at the Site. The Site has an O&M program to deal with friable ACMs where identified in the administration building and OMS (paper pipe insulation, mud fittings, joint compound and wallboard). During the 2006 Site visit it was noted that the former firing range located in the basement of the administration building contained sound proofing material which lined the walls and ceiling. It is not known if this material was sampled in the asbestos survey. According to Site representatives, this material has not been included as part of the O&M program.
- **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 would not have exceeded corresponding CERCLA reportable quantities. There is no evidence that hazardous substances in excess of reportable quantities were release or disposed at the Site.
- **Indoor Firing Range** - An IFR was present in the basement of the administration building. Based on documentation provided by the 63rd RRC, the firing range was cleaned and all sand and dust was removed from the former range. The IFR was remediated to Title 29 CFR 1910.1025 standards in 1994. The firing range is currently used for storage.

- **Lead-Based Paint** - A LBP survey has not been conducted for the buildings on the Site. Based on the construction date of the buildings (1953-1954), it is presumed that lead based paint exists in the structures. During the August 2006 Site reconnaissance, painted surfaces appeared in satisfactory condition.
- **Munitions and Explosives of Concern** - No indications were found during the August 2006 Site reconnaissance or records review process of the past presence of MEC, including unexploded ordnance. Facility personnel indicated that small quantities of small arms ammunition are stored in the arms vault.
- **Nearby Properties** - The Santa Clara County Maintenance Garage, east of the Site, has 15 groundwater monitoring wells related to a gasoline release that occurred in 1988. Two of these wells are on the Site. The release resulted in impacts to the groundwater. Based on groundwater elevation data collected during the assessment activities, groundwater flow has been moving in a westerly direction toward the Site. The two monitoring wells on the USAR Site are sampled every six months. 2005 laboratory results indicated that low concentrations of TPH and the fuel additive MTBE have impacted the groundwater beneath the northeast corner of the Site. Post remedial action monitoring is still in progress. This past release of petroleum contamination into the groundwater and the migration of the contamination plume toward and onto the Site constitute a recognized environmental condition.
- **Oil/Water Separator** - An OWS is located adjacent to an uncovered vehicle wash rack, situated between Buildings 101 and 102. According to Site personnel, the OWS is equipped with a stormwater diversion valve that directs vehicle wash water to the Santa Clara County sanitary sewer system. During large rain events, stormwater flows through the OWS and is directed to local storm drains.
- **Petroleum Product Storage** - There are four metal hazardous material storage containers on the west side of the OMS building. Each shed is equipped with secondary containment and appeared in good condition at the time of the Site reconnaissance. Chemicals reported to be stored in the hazardous material storage sheds typically include; 5-gallon containers of diesel fuel, motor oil, brake fluid, gear oil, lubrication oil, flux paste, silicone compound, multipurpose grease, aerosol spray paints, as well as other typical vehicle maintenance fluids.

No violations were noted in the EDR report with regard to the Site's management of petroleum products. Based on a visual inspection, it appeared that petroleum products are being handled properly at the Site and the storage of these relatively small quantities (no quantities greater than 55-gallons) does not appear to pose an environmental risk at the Site.

- **PCB Equipment** - Based upon information provided by the 63rd RRC, there is no known PCB containing equipment at the Site. PCBs, however, may be contained in light ballasts in older type light fixtures. Based on the construction date of the buildings (1953-1954), it is possible that some of these ballasts could potentially contain PCBs. Any light ballast not marked with "No PCBs" should be managed as if they contain PCBs, and management and disposal of these light ballasts must be in accordance with local, State and Federal requirements.
- **PCB Transformers** - Two pad-mounted, electrical transformer units are located on Site. Both transformers were noted to be in good condition, and no leaks were evident from the units during an August 2006 Site reconnaissance. Per a conversation with a Site representative, a transformer located east of the administration building is owned by PG&E, while a transformer located in the northeast parking area (GSA use area) is owned by the California Department of Agriculture. No PCB stickers were identified on the transformers, and it is unknown if PCB's are present.
- **Radiological Materials** - U.S. Army radioactive commodities are managed at the Site. Per interviews with 63rd RRC personnel the only radiological materials currently stored at the facility are chemical agent detectors. These items are secured in Building 101 arms vault and steel storage cages and in the basement of the administration building. Facility personnel indicated that to their knowledge the Site never had a Nuclear Regulatory Commission permit. Most military facilities will have some low level radiological materials associated with the illumination of various types of military equipment (e.g., watch dials, compasses, aiming circles, etc.). There is no evidence to suggest that radioactive commodities were ever improperly managed at the Site, or that any radionuclides within these sealed-source items were ever released.
- **Radon** - According to the USEPA Radon Zone for Santa Clara County, areas tested were classified in Zone 2, defined as having an indoor average level greater than 2 pCi/L and less than 4 pCi/L. A site specific radon survey was conducted for the Site between December 1993 and July 1994. Radon levels ranged from 0.10 to 3.2 pCi/L, which is below the USEPA recommended action level of 4 pCi/L.
- **USTs/ASTs** - Based upon a review of available Site records, a search of Federal and State environmental databases, Site reconnaissance and interviews with Army Reserve personnel, there are no USTs or ASTs currently located on the Site. Historically one 1,000-gallon diesel UST had been located on the Site. According to the EDR report and documentation provided by the 63rd RRC, a release from this UST was reported in January 1992. Removal and remediation activities were conducted in April 1993. According to the UST removal

documentation, only soil was impacted by the release, and contaminated soils were stockpiled and removed for proper disposal. LUST Site activities were "Closed" with the State in October 1995, and the Site was placed on the historic LUST database. No further action is required in relation to this issue.

- **Wash Rack/Grease Rack** - Previous environmental investigations at the Site have focused on potential releases to the environment at the wash rack, formerly located northeast of the OMS building; and at a grease rack that has been reportedly out of use since about 1986. A final Preliminary Assessment of these structures was submitted to the DTSC, in December 1999. The only contaminants of potential concern were the metals thallium and arsenic, which were detected in several soil samples at concentrations exceeding USEPA's Preliminary Remediation Goals. On February 11, 2003, the DTSC issued a NFA letter for these areas stating that there is no suspected source of release for arsenic or thallium from the grease rack, and there is no evidence of a release for more likely constituents such as volatile organic compounds.

In accordance with Department of Defense policy defining the classifications (See Deputy Under Secretary of Defense Goodman Memorandum dated 21 October 1996), the Site has been classified as Category 2, an area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred. This classification is based on the petroleum release to the soil from a former UST located at the Site, and petroleum impacted groundwater from offsite migration beneath the northeast corner of the Site.

9.0 LIMITATIONS

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

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

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

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

documents or statements of abatement or remediation is beyond the current scope of service included in this contract.

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

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

10.0 REFERENCES

PERSONS CONTACTED

- Mr. J. Stephen Volk, Senior Environmental Manager, Contractor for 63rd RRC
- Staff Sergeant Contajoso, Maintenance Supervisor

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- Radon Survey for 63rd RRC Reserve Centers, August 23, 1994.
- Renewal of License (DACA 05-3-97-600) to the Santa Clara County, CA for a Monitoring Well at the PVT George Richey Army Reserve Center, San Jose, CA, September 18, 2002.

AGENCIES CONTACTED

- Santa Clara Valley Water District, Records Review, Letter Dated August 10, 2006

APPENDIX A FIGURES

APPENDIX B

SITE RECONNAISSANCE PHOTOGRAPHS

APPENDIX C PROPERTY ACQUISITION DOCUMENTS AND CHAIN OF TITLE REPORT

APPENDIX D

PREVIOUS ENVIRONMENTAL SITE ASSESSMENT REPORTS

- Radon Report for 63rd RRC Reserve Centers, August 23, 1994
 - Final Closure Letter Report for the Removal of the UST, Harding Lawson Associates, August 3, 2000
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 - 2005 Annual Groundwater Monitoring Report, Civic Center Garage; Lowney Associates, October 17, 2005
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APPENDIX E REGULATORY DATABASE SEARCH REPORTS