

***FINAL***

**ENVIRONMENTAL CONDITION OF  
PROPERTY REPORT**

**LT JACOB PARROTT MEMORIAL  
U.S. ARMY RESERVE CENTER (OH030)  
1025 SOUTH MAIN STREET  
KENTON, OH 43326**

***Prepared By:***

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

**JULY 2006**

## ENVIRONMENTAL CONDITION OF PROPERTY REPORT SIGNATURE SHEET

The undersigned testify the contents of this report meet the Department of Defense's (DoD) policy for the completion of an Environmental Condition of Property review.



DAVID L. MOORE  
Environmental Division ARIM  
Acting Chief, Environmental Division  
88<sup>th</sup> Regional Readiness Command

8/8/06

DATE



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

8/7/06

DATE

## EXECUTIVE SUMMARY

The U.S. Army Corps of Engineers (USACE) Louisville District has prepared this Environmental Condition of Property (ECP) report for the LT Jacob Parrott Memorial U.S. Army Reserve Center (Facility ID OH030), hereafter referred to as the "Site" or "USAR Center". The Site is located at 1025 South Main Street, Kenton, Hardin County, Ohio 43326. The tract of land is rectangular shaped and encompasses approximately 4.12 acres.

This report was developed in conformance with the limitations of the American Society for Testing and Materials (ASTM) Designation D6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys*. In support of the ECP report, the USACE inspected the Site and performed a reconnaissance of the surrounding area on July 6, 2006.

This Executive Summary provides a brief description of the current and former uses of the Site and areas of potential environmental concern that were evaluated during the ECP process. Detailed information associated with the summary presented below is provided in the remaining portion of this document.

### SITE DESCRIPTION & HISTORICAL USE

The USAR Center includes two permanent buildings situated on approximately 4.12 acres of land. Both buildings are concrete block structures with brick veneer. The USAR Center is currently unoccupied, with the 706<sup>th</sup> Transportation Company being the most recent unit stationed at the facility. The Site has always served as a USAR Center since the United States Government acquired the property in 1958. The original buildings on the Site were constructed in 1959.

The Site is also improved with a privately owned vehicle (POV) parking lot, a military equipment parking (MEP) area, and landscaped grounds. Approximately one-third of the 4.12 acre tract is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.) while the remainder is covered by lawn and a sparse population of deciduous trees. The northwestern portion of the Site, including the MEP area and OMS building, is completely secured by fencing. The remainder of the property, including the administration building and POV parking area, is open to South Main Street.

Based on a review of aerial photographs and United States Geological Survey (USGS) topographical maps dating back to 1915, the Site appears to have been part of the South Kenton Poultry Farm and Hatchery, Inc. prior to the 1958 land acquisition by the U.S. Government. In 1990, extensive modifications were made to the exterior of the administration building which significantly altered and expanded the original design of the facility.

The USAR has historically conducted administrative, logistical, and training activities at the Site, with limited vehicle maintenance occurring in the OMS building.

#### **AREAS ASSESSED FOR ENVIRONMENTAL CONCERN**

The following information was obtained through review of general property information, observation of neighboring properties, research of available historical information, interviews with knowledgeable parties, an environmental record search, and a site reconnaissance.

- Hazardous Substances. Chemicals containing Comprehensive Environmental Response, Compensation, and Liability Act (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 threshold planning quantities. There is no evidence that the chemicals used or stored were ever improperly handled, released, or disposed at the Site.
- USTs/ASTs. No underground petroleum storage tanks (USTs) or aboveground storage tank (ASTs) have historically been located on Site or are currently located on Site.
- Non-UST/AST Petroleum Storage. Petroleum storage would have occurred in designated areas within the OMS building and hazardous material storage closets/sheds located in the MEP area. There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on Site.
- PCBs. One pad-mounted, electrical transformer unit is located on Site. Labeling located on the unit indicates that the oil within the unit contains less than 2 parts per million (ppm) PCB fluid. The unit is owned and maintained by the electric provider, Ohio Power. The unit was in good condition during the July 2006 site visit and no evidence of leakage was observed.

PCBs may be contained in light ballasts in older type light fixtures. A survey of potential PCB-containing light ballasts was conducted in 2005 as part of an Environmental Survey Report. The survey states that all light ballasts inspected in 2005 contained labels stating "No PCB's", with the exception of one ballast located in the administration building. Based on the construction date of the buildings it is possible that some 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.

- Asbestos Containing Materials. A 2005 asbestos survey prepared by ITI of South Florida, Inc. indicated that no confirmed asbestos-containing materials (ACM) are present at the facility.
- Lead-Based Paint (LBP). In 2005, ITI of South Florida, Inc. performed a LBP Survey of the administration and OMS buildings as part of an Environmental

Survey Report. The survey concluded that neither the administration building nor the OMS building contains LBP.

During the July 6, 2006 site visit, painted surfaces in both buildings were observed to be in good condition.

- Radiological Materials. No radiological materials were identified during the site reconnaissance. There is no evidence of any release of radiological materials at the Site.
- Radon. In 2005, ITI of South Florida, Inc. performed a Radon Survey at the Site as part of an Environmental Survey Report. Based on the sampling results, no locations sampled exhibited radon levels above U.S. Environmental Protection Agency's (USEPA's) recommended maximum allowable exposure level of 4 picoCuries per liter of air (pCi/l).
- Munitions and Explosives. No evidence was found during the site reconnaissance or records review process of the past presence of Munitions and Explosives of Concern (MEC).
- Surrounding Properties. Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site were evaluated. Overall, none of the properties evaluated exhibited environmental conditions that had or have the potential to adversely affect environmental conditions at the Site.

## **ENVIRONMENTAL CONDITION OF PROPERTY**

Findings of this ECP report were based on readily available, environmental information, interviews with site personnel, previous environmental studies, and federal and state database and file information related to the storage, release, treatment or disposal of hazardous substances or petroleum products. Findings were also based on visual observations from the time of the site visit and telephone interviews with local and state personnel. In accordance with ASTM Designation D5746-98 (2002), Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities, the Site has been classified as Type 1, an area or parcel of real property where no release, or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).

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## LIST OF ACRONYMS

ACM	asbestos-containing material
AMSA	Area Maintenance and Support Activity
AR	army regulation
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
BUSTR	Bureau of Underground Storage Tank Regulations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CONEX	Container Express
DoD	Department of Defense
ECP	environmental condition of property
EDR	Environmental Data Resources, Inc.
FEMA	Federal Emergency Management Agency
kg	kilogram
LBP	lead based paint
LUST	leaking underground storage tank
MEC	munitions and explosives of concern
MEP	military equipment parking
NFA	no further action
NPL	National Priorities List
NRHP	National Register of Historic Places
OCMP	Ohio Coastal Management Program
ODNR	Ohio Department of Natural Resources
OMS	organizational maintenance shop
OVS	oil/water separator
PCBs	polychlorinated biphenyls
pCi/l	picoCuries per liter of air
POL	petroleum, oil, and lubricant
POV	privately owned vehicle
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
RCRIS	RCRA Information System
RQ	reportable quantity
RRC	Regional Readiness Command
Site	LT Jacob Parrott Memorial U.S. Army Reserve Center (OH030)
STATSGO	State Soil Geographic Database
TSD	treatment, storage, or disposal
USACE	United States Army Corps of Engineers
USAR	United States Army Reserve
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
VAP	voluntary action program
WSR	wild and scenic river

## 1.0 INTRODUCTION

The Environmental Branch of the U.S. Army Corps of Engineers (USACE) Louisville District Engineering Division was authorized to conduct an Environmental Condition of Property (ECP) report for the LT Jacob Parrott Memorial U.S. Army Reserve Center (OH030), in response to the Base Realignment and Closure (BRAC) 2005 legislation. The facility is located at 1025 South Main Street, Kenton, Hardin County, Ohio hereafter referred to as the "Site" or "USAR Center". In support of the ECP, a visual inspection of the Site was conducted on July 6, 2006. The purpose of the inspection was to visually obtain information indicating the likelihood of recognized environmental conditions in connection with the site.

### 1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY (ECP)

This report meets the Department of Defense's (DoD) requirement to prepare an ECP Report under the provisions of the Base Redevelopment and Realignment Manual (DOD 4165.66-M, March 1, 2006) Section C8.3. The ECP was performed to collect reliable information regarding the environmental condition of the property to determine the property's suitability for outgrant or transfer, and to meet the requirements under Title 40, Code of Federal Regulations, Part 373, § 373.1 (40 CFR 373.1), and U.S. Army Regulation (AR) 200-1, Environmental Protection and Enhancement. The information gathered during this assessment will also be used with the objective of assisting the U.S. Army (Army), the General Services Administration, and the purchaser in making informed business decisions about the transfer of the property by reducing uncertainty regarding its environmental condition.

The Army prepared this ECP for the following purposes:

- Identify, characterize and document the presence or likely presence of a release or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property associated with the historical and current use of the facility.
- Identify, characterize and document the release or suspected release of any hazardous substances or petroleum products from an adjacent property that would likely cause or contribute to contamination on the property.
- Provide a basis for determining if the property is suitable for transfer, lease, or assignment.
- Provide information to satisfy legal requirements including:
  - Notification requirements under §120(h)(1) and (3)(A)(i) of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and state or local real property transfer requirements;

- Uncontaminated parcel identification requirements of Section 120(h)(4) of CERCLA; and
- State or local real property transfer requirements that are applicable to the federal government and the transaction.
- Provide a commercially acceptable level of environmental information necessary to facilitate the divestiture of the property.

The purpose as stated above does not include de minimis conditions that generally do not present a 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. Conditions determined to be de minimis are not addressed.

The ECP report contains the information required to comply with the provisions of 40 CFR, Part 373 that require a notice accompany contracts for the sale of, and deeds entered into for the transfer of federal property on which hazardous substances may have been stored, released or disposed of. CERCLA §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) 1,000 kilograms or the reportable quantity (RQ), whichever is greater, of the substances specified in 40 CFR 302.4, or (2) 1 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 RQ. AR 200-1 requires that the ECP report address asbestos, lead-based paint, radon and other substances potentially hazardous to health.

This ECP report was performed in substantial compliance with American Society for Testing and Materials (ASTM) Standard Practice D6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys*. Although many of the ECP development activities may be considered “due diligence” functions, the ECP report is not prepared to satisfy a real property purchaser's duty to conduct an “appropriate inquiry” to establish an “innocent purchaser defense” to CERCLA 107 liability. Any such use of the ECP by any party is outside the control of the United States Army and beyond the scope of the ECP. The United States Army, its officers, employees or contractors make no warranties or representations that any ECP report satisfies any such requirements for any party. Although this report was designed to eliminate the uncertainty regarding the potential for recognized environmental conditions to the minimum practicable level, it does not eliminate the uncertainty altogether.

## **1.2 SCOPE OF SERVICES**

This ECP report covers the 4.12-acre USAR Center located at 1025 South Main Street, Kenton, Ohio. The property is bounded by South Main Street to the south, residential areas to the north and east, and commercial development to the west. Site maps are provided in Appendix A. Appendix B provides photographs taken during the July 2006

site visit. Appendix C provides warranty deeds for the property 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 ASTM Designation D5746-98 (2002), Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities. The property classification categories are as follows:

- ECP Area Type 1 – An area or parcel of real property where no release, or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).
- ECP Area Type 2 – An area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred.
- ECP Area Type 3 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- ECP Area Type 4 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, and all remedial action necessary to protect human health and the environment have been taken.
- ECP Area Type 5 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred and removal or remedial actions, or both, are under way, but all required actions have not yet been taken.
- ECP Area Type 6 – An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but required response actions have not yet been initiated.
- ECP Area Type 7 – An area or parcel of real property that is unevaluated or requires additional evaluation.

Areas classified as Area Types 1 through 4, as defined in this classification, are suitable, with respect to CERCLA 120(h) requirements, for deed transfer to a non-federal recipient.

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## 2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

### 2.1 SITE LOCATION

The USAR Center is located in the central portion of Hardin County, Ohio, within the city limits of Kenton, Ohio. The site is located in a primarily residential area, with some commercial and industrial properties located east and west of the property. Figure 1 in Appendix A provides a general site location map.

### 2.2 ASSET INFORMATION

Facility Name and Address: LT Jacob Parrott Memorial U.S. Army Reserve Center (OH030)  
1025 South Main Street  
Kenton, OH 43326

Property Owner: United State Government

Date of Ownership: December 23, 1958

Current Occupant: Unoccupied (706<sup>th</sup> Transportation Company Detachment was last unit to occupy Site. Vacated facility in April 2006)

Zoning: M-1, Light Manufacturing District

County, State: Hardin County, Ohio

USGS Quadrangle(s): Kenton, Ohio

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

Latitude/longitude: 40° 38' 11.0" N; 83° 36' 11.5" W

Legal Description:

The USAR Center includes two parcels of land, described in the warranty deeds as Tract 100 and Tract 101. Copies of the deeds, which include accurate legal descriptions, are provided in Appendix C.

### 2.3 PHYSICAL DESCRIPTION

The USAR Center is situated on approximately 4.12 acres of land with two permanent structures: a 17,950 square-foot administration building and a 3,390 square-foot

organizational maintenance shop (OMS) building. Construction of the administration building and OMS building occurred in 1959. Significant modifications to the administration building occurred in 1990 changing the original design of the structure. Subsequently, the construction date was reassigned to 1990.

Both structures consist of concrete block walls covered with a brick veneer. Both buildings rest upon concrete foundations. A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area are also contained within the Site. Photographs 1 and 2 in Appendix B provide views of the MEP and POV areas, respectively. Chain-link security fencing topped with barbed wire encloses the MEP area and OMS building, and the northwest section of the property. Approximately one-third of the Site is covered by impervious surface features (e.g. asphalt parking areas, driveways, concrete walkways, building footprints, etc.). The remaining ground surface is covered by lawn area and a sparse population of deciduous trees. Topographically, the Site is relatively flat and contains little relief. Figure 2 in Appendix A provides a current plan view layout of the Site. Appendix B provides photographs taken during the July 2006 site visit.

The original portion of the administration building consisted of a one-story, rectangular shaped structure. In 1990, several sections were added to the north and east walls of the original structure and a new exterior facade was installed around the perimeter of the building. It is currently an irregular-shaped multiple-level structure with two, one-story administration sections, and a two-story drill hall connected by a one-story enclosed corridor. Photograph 3 in Appendix B provides a front (south) view of the exterior of the building. Photograph 4 in Appendix B provides a side (east) view of the exterior of the building. The interior of the administration building consists of office space, classrooms, kitchen area, storage, former indoor firing range (IFR), and a drill hall. Photographs 5 through 13 provide interior views of the administration building. Figure 3 in Appendix A provides a layout of the interior of the administration building.

The OMS building is a one-story, rectangular shaped structure. During the 1990 addition to the administration building, the OMS building received a new brick facade. The OMS building contains a work bay area, storage room, storage cages, and an office. Overhead metal, retractable doors are located on both the north wall and south wall of the building. Photographs 14 and 15 in Appendix B shows the rear (north) and side (east) views of the OMS building. Photographs 16 - 19 in Appendix B show the interior of the OMS building. Figure 4 in Appendix A provides a layout of the interior of the OMS building.

Vehicle washing historically occurred in the OMS building. Two slotted floor drains (see Photograph 20 in Appendix B) located in the work bay area carried rinse water to an oil water separator (OWS) located in the MEP area, near the southeast corner of the OMS building. During the historical record review, no evidence was found to support the removal of the OWS; therefore, it is still presumed to be present on Site. The Site also contains a can wash area and a grease trap associated with the kitchen located within the administration building. A storm water lift station is located on the USAR Center property, near the southeast property corner (see Photograph 21 in Appendix B). The lift station, installed in 1995, routes storm water collected in storm drains within the

Site's parking areas to a ditch/small stream located approximately 100 yards down South Main Street. The lift station is equipped with an alarm connected to the USAR Center. According to personnel familiar to the Site, the alarm has never gone off.

No military vehicles were located within the MEP area during the site visit. Three non-permanent metal communication type Container Express (CONEX) structures (see Photograph 22 in Appendix B) and one hazardous material storage shed were located north of the OMS building (see Photograph 23 in Appendix B). The CONEX structures and hazardous material storage shed were both locked and inaccessible at the time of the site visit.

## **2.4 SITE HYDROLOGY AND GEOLOGY**

### **2.4.1 Surface Water Characteristics**

Figure 5 in Appendix A provides a portion of the 1980 Kenton, Ohio United States Geological Survey (USGS) topographic map which includes the Site. As shown, the Site is situated at an elevation of approximately 964 feet above mean sea level and is relatively flat. In the immediate vicinity of the Site, the land surface is situated on a plateau like plain that gently slopes towards the Scioto River located north of the Site. Storm water sheet flows to storm drains located in the MEP area and POV parking area. A storm drain is also located in the grassy area north of the MEP area near the northern property boundary. The storm drains flow to a storm water lift station located near the southeast property corner. Storm water is pumped approximately 100 yards down South Main Street until it ultimately discharges to a ditch/small stream.

No surface water features are located in the immediate vicinity of the Site. Scioto River, located approximately 750 feet north of the Site, is the closest major surface water feature. The Scioto River ultimately discharges to the Ohio River.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 3902530001C, the Site is not included in the 100-year floodplain elevation or the 500-year floodplain elevation. Figure 6 in Appendix A provides a map depicting the extents of the nearest 100-year and 500-year floodplain in relation to the Site.

### **2.4.2 Hydrogeological Characteristics**

According to information acquired from the Soil Conservation Service's State Soil Geographic Database (STATSGO) for Hardin County, specific types of soil at the Site are from the Pewamo and Blount Series. The Pewamo and Blount Series are both listed as partially hydric soils.

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

approximately 13 inches thick and is a silty clay loam. The subsoil is approximately 47 inches thick and is clay loam.

## **2.5 SITE UTILITIES**

**Water Service** – The City of Kenton provides potable water service to the Site.

**Sanitary Sewer System** – The City of Kenton 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** – Columbia Gas of Ohio provides natural gas service to the Site, while Ohio Power provides electric service to the Site.

## **2.6 WATER SUPPLY WELLS & SEPTIC SYSTEMS**

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

A search of Federal and State water well databases identified one water supply source located approximately ½ - mile northwest of the Site. The well is one of the City of Kenton's three water supply wells and is located topographically down-gradient of the Site.

### **3.0 SITE HISTORY**

#### **3.1 HISTORY OF OWNERSHIP**

Land titles for the Site were reviewed back to 1926. Appendix C contains a chain of title report completed for the Site. The chain of title report did not identify any leases or environmental liens against the USAR Center property. According to historical documentation, the United States of America purchased the Site in December 1958 from the Shick family and Ira C Shick Incorporated, formerly known as The South Kenton Poultry Farm and Hatchery, Inc. Prior to the U.S. Government's purchase of the land, the property was part of the South Kenton Poultry Farm, as indicated on historical Sanborn fire insurance maps. Appendix E provides a copy of the historical Sanborn fire insurance maps obtained from EDR.

Available business directories including City, cross-reference, and telephone directories were reviewed, if available, at approximately five-year intervals for the years spanning 1971 through 2003. According to a City Directory provided by EDR and dated June 30, 2006, the address of the USAR Center was first listed in the research source (Polk's City Directory and Robinson's City Directory) in 1974. Subsequent city directory searches do not list the Site. Historical documentation supports the 1959 construction date of the USAR Center. A copy of the City Directory is included in Appendix E.

#### **3.2 PAST USES AND OPERATIONS**

In 1958, the U.S. Government purchased the 4.12 acres of land for construction of the USAR Center. Construction of the administration building and OMS building occurred in 1959. Historical information sources suggest that the Site was formerly part of the South Kenton Poultry Farm. The Site has always served as a reserve and mobilization center for the U.S. Army Reserve since the U.S. Government acquired the land in 1958.

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 706<sup>th</sup> Transportation Company was the last occupying unit at the USAR Center. The mission of this unit is to provide transportation support and haul bulk fuel in the Forward Theater of Operations. At the time of the site visit, the administration building contained various items, including desks, office furniture, and folding tables.

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 at one of the other Reserve Centers in Ohio. Equipment requiring major overhaul was also sent off site. A real estate utilization report prepared by USACE, Louisville District in 1969

states that various military equipment was assigned to the unit occupying the Kenton USAR Center including jeeps, 2-1/2 ton cargo trucks, 5 ton cargo trucks, 5 ton tractor trailer trucks, 5,000 gallon fuel storage trailers, cargo trailers, and a water storage trailer.

At the time of the Site visit, the OMS building contained a wheeled military vehicle, a 50-gallon drum for used absorbents, a 50-gallon drum for clean absorbents, two metal trash cans for clean and used rags, an empty five gallon fuel container, and a drip pan containing a dark liquid substance (see Photographs 24 and 25 in Appendix B). A storage room located in the OMS building contained a vehicle battery and other supplies. With the exception of the one military vehicle located in the OMS building, no military vehicles were observed at the time of the Site visit. According to SFC Glenn Fleming of the 706<sup>th</sup> Transportation Company, the 175<sup>th</sup> Quartermaster Company located in Delaware, Ohio will take ownership of the military equipment vehicle located in the OMS building prior to transfer of the Kenton USAR Center.

Vehicle washing would have historically occurred in the OMS building. Two slotted trench drains located in the floor of the work bay area carried rinse water to an OWS located in the MEP area, which ultimately discharged to the municipal sanitary sewer. No storage tanks are associated with the OWS.

Historical aerial photographs and topographic maps were the primary source of information on the past use and operations at the Site. Figure 5 and Figures 7 - 13 in Appendix A provide USGS topographical maps and aerial views of the Site and surrounding areas in 1915, 1961, 1967, 1974, 1979, 1988, and 2005.

The 1915 USGS topographical map (Figure 7, Appendix A) shows the Site and areas to the east and north as undeveloped. Residential development is visible west of the Site and to a lesser extent, to the south. The City of Kenton is established to the northwest.

The 1961 USGS topographical map (Figure 8, Appendix A) shows both the administration building and OMS building. The apartment complex presently located east and north of the Site has not yet been constructed. Development along South Main Street is also visible.

The 1967 aerial photograph (Figure 9, Appendix A) shows what appear to be military vehicles or CONEX structures in the MEP area. A portion of the Scioto Village Apartments have been constructed east of the Site, while the area north of the Site is vacant and appears undisturbed. A building structure is located west of the Site, in the present location of APS Technology. The Scioto River is visible to the northeast.

The 1974 aerial photograph (Figure 10, Appendix A) shows the Site and adjacent properties relatively unchanged from the 1967 aerial photograph.

The 1979 aerial photograph (Figure 11, Appendix A) shows the construction of additional apartments north and east of the Site.

The 1988 aerial photograph (Figure 12, Appendix A) shows additional apartments associated with Scioto Village Apartments constructed north of the Site. The area located north of the MEP area appears dark in color, possibly indicating a saturated ground surface. This is consistent with observations made during the site visit of standing water and aquatic type vegetation.

The 2005 aerial photograph (Figure 13, Appendix A) shows the Site as it currently exists. The Scioto Village Apartments are visible to the east and north of the Site. Single-family residences are visible south of the site and the APS Technology building is visible west of the Site. No stained or distressed areas are visible on the Site.

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

#### **3.3.1 Past Use and Storage of Hazardous Substances**

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

Chemicals formerly used and stored at the Site were associated with vehicle and facility maintenance activities, and janitorial services. Janitorial chemicals and building maintenance-related products were stored in the designated storage area within the janitorial 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. Other potentially hazardous materials and POL products would have been stored in the outdoor hazardous material storage shed located north of the OMS building within the MEP area.

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

#### **3.3.2 Past Disposal and Release of Hazardous Substances**

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

### **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, and interviews with Army Reserve personnel, it does not appear that aboveground storage tanks (ASTs) and/or underground storage tanks (USTs) ever existed on Site.

An OWS is present on Site, however there is no used oil storage tank associated with it. The OWS discharges the sanitary sewer system.

### **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 1997 Cross Connection Backflow Prevention Program Report**

The report's objective was to locate and identify the occurrences of cross-connection protection code violations and make the appropriate backflow prevention device recommendations to correct any deficiencies. Code requirements, facility inspection checklists, and recommendations were included in the report. Deficiencies were noted within the buildings and corrective actions were recommended.

#### **3.5.2 1998 Oil Water Separator (OWS) Evaluation Report**

Jones Technology, Inc. prepared an OWS evaluation report for numerous USAR sites within the state of Ohio, including the Kenton USAR Center. As part of the reporting process, Jones Technology, Inc. was responsible for documenting and locating each OWS located at USAR facilities throughout Ohio. The report states that an OWS is located on Site within the MEP area, near the southeast corner of the OMS building. Two trench drains located inside the OMS building are connected to the OWS. No oil storage tank is associated with the OWS system. The system was observed to be in good condition and was noted as bring in compliance with regulatory requirements.

#### **3.5.3 1998 Environmental Compliance Assessment Report**

The Reserves performed an internal survey in 1998, listing and evaluating areas on the Site where environmental concerns were apparent. Five areas were noted as needing correction at the time of the assessment. None of the deficiencies observed posed an immediate risk to the environmental condition at the Site.

#### **3.5.4 1998/1999 Ohio Section 110 Inventory**

This document was prepared for the 88<sup>th</sup> Regional Readiness Command (RRC) by the Fort McCoy Archaeological Laboratory, in December 1998 – December 1999. The

purpose of this document was to inventory all properties controlled or leased by the 88<sup>th</sup> RRC in the State of Ohio. Historical information, setting and landscape, cultural resources, security, architectural information, and structure descriptions are included for each property. Each site was also assessed for its eligibility to the National Register of Historic Places (NRHP). Neither building at the Site met the criteria for inclusion in the NRHP.

### **3.5.5 2001 Range Cleanup Report**

In September 2001, a *Range Cleanup Project Report* that documented the clean up of the indoor firing range was completed by IT Corporation. Cleanup included removing sound deadening materials from walls and ceiling, removing bullet traps and associated lead shot, cleaning the range, cleaning and removing the air handling system, and collecting clearance samples. Initial clearance sampling completed after the range cleanup, indicated lead levels above the clearance criteria of 200 micrograms/square foot ( $\mu\text{g}/\text{sf}$ ). Recleaning of the range floor occurred and subsequent clearance samples revealed that clearance levels were attained and the range was safe for reoccupation.

### **3.5.6 2005 Natural Resources Survey and Mapping**

The objective of this report was to document and map the natural resources found at 88th RRC facilities located in Ohio. The Site did not contain or exhibit the potential for wetlands, surface waters, flood plains, and/or rare species.

### **3.5.7 2005 Environmental Survey Report: Asbestos, PCB, Lead Based Paint and Radon Survey**

ITI of South Florida, Inc. prepared an Environmental Survey Report in April 2005 for the Kenton USAR Center. Potential types, quantities, locations, and conditions of asbestos, PCBs, lead based paint, and radon were examined in the report. Confirmed asbestos and lead based paint were not found to be present in either building structure on Site. Light ballasts containing labels stating "No PCB's" were observed during the PCB survey in both buildings. Some ballasts did not contain labeling indicating the absence or presence of PCBs. A pad mounted transformer was also observed at the Site. All measured radon levels were below USEPA's recommended action level of 4 pCi/l.

#### 4.0 ADJACENT PROPERTIES

Figure 13 in Appendix A provides a 2005 aerial view of the Site and adjacent properties. APS Technology Center is located west of the Site, while residential areas are located east, south, and north of the Site. South Main Street bounds the Site to the south, with single family residences located beyond. Table 1 provides a list of adjacent properties with their directional location in regards to the Site. The zoning of the adjacent parcels is also listed in Table 1. Photographs 26 through 29 in Appendix B provide views of adjacent properties and surrounding land use.

<b>TABLE 1 LIST OF ADJACENT PROPERTIES</b>			
<b>Direction From Site</b>	<b>Name/Type of Property</b>	<b>Address</b>	<b>Zoning</b>
North	Scioto Village Apartments	1037 South Main Street	R-2, Multi-Family Residential District
South	Single Family Residential	1004 – 1018 South Main Street	R-1, Single-Family Residential District
East	Scioto Village Apartments	1037 South Main Street	R-2, Multi-Family Residential District
West	APS Technology Center	911 South Main Street	M-1, Light Manufacturing District

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

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## **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 June 28, 2006. The regulatory database summary consolidates standard federal, state, local, and tribal environmental record sources based on ASTM recommended minimum search distances from the Site. A copy of the complete EDR report is included in Appendix E.

### **5.1 FEDERAL ENVIRONMENTAL RECORDS**

#### **5.1.1 Federal NPL Sites within 1.0-Mile**

The National Priorities List (NPL) record is a USEPA registry of the nation's worst uncontrolled or abandoned hazardous waste sites. NPL sites are targeted for long-term remedial action under CERCLA. According to the EDR report, the USAR Center is not a NPL site and there are no such sites located within one-mile of the Site.

#### **5.1.2 Federal CERCLIS Sites within ½-Mile**

The CERCLA Information System (CERCLIS) contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Act. CERCLIS contains sites that are either proposed to be or are on the NPL and sites that are in the screening and assessment phase for possible inclusion on the NPL. According to the EDR report, the USAR Center is not a CERCLIS site and there are no CERCLIS sites located within a ½-mile of the Site.

#### **5.1.3 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. No CORRACTS sites were identified within one-mile of the Site.

#### **5.1.4 RCRA Transport, Treatment, and/or Disposal Sites within ½-Mile**

The RCRA Information System (RCRIS) includes selective information on sites that generate, transport, store, treat and/or dispose (TSD) of hazardous waste as defined by

RCRA. According to the EDR report, the USAR Center is not a RCRIS-TSD site and there are no such sites located within ½-mile of the USAR Center.

#### **5.1.5 Federal RCRA Small and Large Quantity Generators List within ¼ - Mile**

Conditionally exempt small quantity generators 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 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.

The USAR Center is listed as a RCRA-registered small quantity generator according to the EDR report. One additional RCRA-registered small quantity generator, International Paper Food Service Business, is located within 1/8<sup>th</sup> – mile of the Site, approximately 156 feet southwest of the USAR Center. International Paper Food Service Business is located at approximately the same topographic elevation as the USAR Center. No RCRA violations are associated with the USAR Center or the International Paper Food Service Business site. No large quantity generators are situated within ¼-mile of the Site.

#### **5.1.6 Federal Emergency Response Notification System (ERNS) List**

The ERNS List provides information on reported releases of oil and hazardous substances. According to the EDR report, the USAR Center is not on this notification list.

### **5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS**

The regulatory information presented below was obtained from the EDR regulatory database search report. Supplemental information was also provided from database searches via the State of Ohio's online utility.

#### **5.2.1 State-Registered Landfills or Solid Waste Disposal Sites within ½ - Mile**

According to the EDR report, no solid waste landfills, incinerators, or transfer stations are located within ½-mile of the USAR Center. The Site does not have a solid waste landfill, incinerator, or transfer station within the property boundary.

### 5.2.2 State-Registered Leaking UST (LUST) Sites within ½ - Mile

According to the EDR report and the state of Ohio's Bureau of Underground Storage Tanks (BUSTR) database, eight LUST sites were identified within ½-mile of the USAR Center. Table 2 lists the sites along with their addresses and elevations relative to the Site. The Site itself is not listed in the State LUST database. As shown in Table 2, six of the eight LUST sites have received closure, indicating that no further remedial action is required and that residual petroleum contamination does not pose a concern for human health or the environment. None of the LUST sites are located in a well head protection area.

<b>TABLE 2 LEAKING UNDERGROUND STORAGE TANK SITES</b>				
<b>Company/Site</b>	<b>Address</b>	<b>Distance and Direction from Site</b>	<b>Status</b>	<b>Elevation Relation to Site</b>
Ohio Department of Transportation, Hardin County Garage	13052 Letson Avenue, Kenton, OH 43326	Approximately 866 feet south-southwest	No Further Action	Lower
King-Ohio Forge	820 Steiner Avenue, Kenton, OH 43326	Approximately 1,420 feet west	Active	Higher
Universal Cooperatives, Inc.	728 Steiner Avenue, Kenton, OH 43326	Approximately 1,432 feet west	No Further Action	Higher
Essex Group, Inc.	350 West Espy Street, Kenton, OH 43326	Approximately 2,377 feet northwest	No Further Action	Lower
Imperial Transportation Corporation	809 Fontaine Street, Kenton, OH 43326	Approximately 2,381 feet west-northwest	2 Incidents – No Further Action	Higher
Aband Station	201 West Espy Street, Kenton, OH 43326	Approximately 2,414 feet northwest	No Further Action	Lower
Kenton Distributing	14191 Harris, Kenton, OH 43326	Approximately 2,431 feet west-southwest	Active	Higher
Hideaway Pets	504 Fontaine, Kenton, OH 43326	Approximately 2,460 feet northwest	No Further Action	Lower

Two active LUST sites, King-Ohio and Kenton Distributing were identified within ½ mile of the USAR Center. Site specific groundwater flow direction was not available at the time of this writing. However, based on the topography in the site vicinity and the location of the Scioto River (north) in relation to the site; groundwater flow direction is interpreted to be to the north. Based on the interpreted groundwater flow direction, the two active LUST sites are located cross-to-up-gradient from the site.

The two active LUST sites are not considered to be a potential environmental risk to the site due to their location with regards to the site; and the receptors (i.e..sewer, rail line, etc.) located between the active sites and the USAR Center.

### 5.2.3 State-Registered UST Sites within ¼ - Mile

According to the EDR report and state of Ohio's BUSTR database, two UST sites were identified within ¼ - mile of the USAR Center. Table 3 lists the sites along with their address and elevation relative to the Site. The Site itself is not listed in the State UST database.

Six USTs are located at the Jumpin' Jims gas station and convenience store. Three of the USTs contain gasoline while the remaining three USTs contain diesel fuel. The tanks range in size from 8,000 gallons to 20,000 gallons and are constructed of double walled fiberglass or fiberglass reinforced plastic. No documented releases have occurred at this site. BUSTR performed an inspection of the tanks on April 5, 2006 and no violations were observed.

Four USTs are present at the Ohio Department of Transportation's Hardin County Garage. Two of the tanks contain diesel fuel, one tank contains gasoline, and one tank contains used oil. The tanks range in size from 1,000 gallons to 10,000 gallons and are constructed of fiberglass reinforced plastic. A documented release occurred on the property as defined by BUSTR's LUST database and the site was granted no further action under BUSTR's 1992 Corrective Action guidance document. According to BUSTR, groundwater was not impacted from the release.

<b>TABLE 3 Underground Storage Tank Sites</b>					
<b>Company/Site</b>	<b>Address</b>	<b>Distance and Direction from Site</b>	<b>Tank Status</b>	<b>Closure Status</b>	<b>Elevation Relation to Site</b>
Jumpin' Jims	1255 South Main Street, Kenton, OH 43326	Approximately 206 feet west-northwest	6 Tanks - Currently in Use	NA	Equal
Ohio Department of Transportation, Hardin County Garage	13052 Letson Avenue, Kenton, OH 43326	Approximately 866 feet south-southwest	4 Tanks - Currently in Use	NA	Lower

Based upon the condition of the USTs present at both properties and the nature of the one release associated with the Ohio Department of Transportation's Hardin County Garage, neither property is considered to present an environmental risk to the USAR Center. Additionally, both properties are located topographically down gradient from the USAR Center.

#### **5.2.4 State Spills Incidents (OH Spills)**

According to the EDR report, the USAR Center is not listed on the Ohio state petroleum spill list.

#### **5.2.5 Records of Contaminated Public Wells**

The EDR report identified one water supply source located approximately ½ - mile northwest of the Site. The supply is listed on the Federal Reporting Data System, which includes sites where violations and enforcement for public water systems has occurred. The supply source is associate with the City of Kenton Water Utility and is located topographically down-gradient of the Site. Violations associated with this water supply well included inadequate reporting and issues related to heavy metal concentrations. Violations associated with the water supply would have occurred prior to August 1995, based on the fact that the Federal Reporting Data System was replaced with the Safe Drinking Water Information System in August 1995.

#### **5.2.6 Voluntary Action Program Sites within ½ - Mile**

One site listed in the State's Voluntary Action Program (VAP), Universal Cooperatives, Inc., is located within ½ - mile of the USAR Center. Discussions with Mr. Archie Lunsey of the Ohio Voluntary Action Program, Northwest Office revealed that the property was issued a no further action ruling and a subsequent covenant not to sue on August 27, 1999 after the property owners demonstrated that all environmental concerns had been resolved to a level that was protective of human health and the environment.

#### **5.2.7 State Brownfields Program Sites within ½ - Mile**

According to the EDR report, no state registered Brownfield Program Sites are located within ½ - mile of the USAR Center.

#### **5.2.8 State-Registered Sites with Engineering Controls within ½ - Mile**

According to the EDR report, no state registered sites requiring engineering land use controls are located within ½ - mile of the USAR Center.

### **5.2.9 State-Registered Sites with Institutional Engineering Controls within ½ - Mile**

According to the EDR report, one state registered site, Universal Cooperative, Inc., has institutional engineering controls in place within ½ - mile of the USAR Center. Land use at this property is commercial.

### **5.2.10 State-Registered Dryclean Facilities within ¼ - Mile**

According to the EDR report's list of orphaned sites, one dry cleaning facility, Community Cleaners, is located within ¼ - mile of the USAR Center. The facility is not listed on any other federal, state, or local environmental databases searched during the data gathering process.

### **5.2.11 State-Registered Historical Towngas Sites within 1 - Mile**

The Towngas database contains a listing of 82 historical sites (circa 1895) which produced gas from coal for street lighting. Towngas sites have the potential for buried coal tar remains. According to the EDR report's list of orphaned sites, one historical Towngas site, Scioto National & Oil Company, is located within 1 - mile of the USAR Center. This property is located topographically downgradient of the USAR Center, near the intersection of West Walnut Street and Main Street.

## **5.3 TRIBAL ENVIRONMENTAL RECORDS**

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

### **5.3.1 Registered Indian Reservations within 1 - Mile**

According to the EDR report, no designated Indian Reservations are located within 1 - mile of the USAR Center.

## **5.4 UNMAPPED SITES**

The EDR database search yielded eighteen 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](http://maps.google.com). The locations of all orphaned sites were identified and mapped. Two of the sites, Community Drycleaners and Scioto National & Oil Company, are located within corresponding ASTM search radius distance.

## 5.5 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO THE SITE

To summarize Subsections 5.1 through 5.3, 12 separate properties, in addition to the USAR Center, were evaluated as potential risk properties to the Site. The properties evaluated were identified as a result of information obtained during area reconnaissance and regulatory database searches and are listed below in Table 4.

<b>TABLE 4 PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS</b>				
<b>Company/Site</b>	<b>Database</b>	<b>Elevation in Regards to Site</b>	<b>Potential Risk to Site?</b>	<b>Comment</b>
International Paper Food Service Business	RCRA Small Quantity Generator	Equal	No	No RCRA violations.
Ohio Department of Transportation, Hardin County Garage	LUST, UST	Lower	No	LUST received NFA. No violations associated with USTs.
King-Ohio Forge	LUST	Higher	Active	Higher
Universal Cooperatives, Inc.	Voluntary Action Program, Institutional Engineering Control, LUST	Higher	No	LUST received NFA. VAP issued NFA and covenant not to sue was issued.
Essex Group, Inc.	LUST	Lower	No	NFA
Imperial Transportation Corporation	LUST	Higher	No	NFA
Aband Station	LUST	Lower	No	NFA
Kenton Distributing	LUST	Higher	Active	Higher
Hideaway Pets	LUST	Lower	No	NFA
Jumpin' Jims	UST	Equal	No	No violations associated with USTs.
Community Cleaners	Registered Drycleaner	Equal	No	Not listed in any other environmental database.
Scioto National & Oil Company	Towngas List	Lower	No	Not listed in any other environmental database.

Based on an evaluation of available site information and details concerning the properties listed in Table 4, none of the facilities evaluated are classified as "High Risk".

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

## **6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS**

Findings documented in the following subsections are based on the July 6, 2006 site inspection and area reconnaissance, a review of available site records, and information obtained from U.S. Army Reserve personnel.

### **6.1 UNDERGROUND/ABOVEGROUND STORAGE TANKS (USTs/ASTs)**

It does not appear that USTs or ASTs have historically existed on Site or are currently present on Site.

An access shaft to an OWS system was observed during the July 2006 site visit. Based on historical documents and interviews with reserve personnel, the OWS does not have a used oil storage tank associated with it.

### **6.2 INVENTORY OF CHEMICALS / HAZARDOUS SUBSTANCES**

At the time of the Site visit, the OMS building contained a wheeled military vehicle, a 50-gallon drum for used absorbents, a 50-gallon drum for clean absorbent, two metal trash cans for clean and used rags, an empty five gallon fuel container, and a drip pan containing a dark liquid substance. A storage room located in the OMS building contained a vehicle battery and other supplies. No hazardous substances were observed in the administration building at the time of the July 2006 site visit.

A hazardous material storage shed located in the MEP area was also observed during the Site visit, however the shed was locked and the interior of the shed was inaccessible. A former occupant of the USAR Center, SFC Glenn Fleming of the 706<sup>th</sup> Transportation Company, stated that he believed that paint and other types of materials to support unit level maintenance activities were housed in the hazardous material storage shed.

### **6.3 WASTE DISPOSAL SITES**

There were no signs of landfilling or illegal waste disposal activities at the Site during the July 2006 site inspection.

### **6.4 PITS, SUMPS, DRYWELLS, AND CATCH BASINS**

One sump was observed in the storage room of the OMS building during the July 2006 site visit. According to real property transfer records, a sump and associated sump-pump were included in the initial construction of the building.

The kitchen area of the administration building contains a grease trap. Floor drains are located within the kitchen area, mechanical room, and restrooms. It was not apparent

where these three drains ultimately discharge. The OMS building contains floor drains in the work bay area and storage room.

The vehicle washing area located in the OMS building has two trench drains connected to an OWS located in the MEP area. Ultimate discharge is to the municipal sanitary sewer.

The sanitary wastewater collection and conveyance structures merge so that all sources of sanitary wastewater exit the Site at one location south of the USAR Center beneath South Main Street.

Storm water sheet flows towards storm drains located throughout the MEP and POV parking areas. An additional storm drain located in the grassy area north of the MEP area directs flow from the northern portion of the property off Site. A storm water lift station is also located on Site, near the southeastern property corner and is part of the Site's storm water drainage system. The lift station contains a pump that is responsible for pumping storm water collected in storm drains within the parking areas to an outlet located approximately 100 yards down South Main Street.

## **6.5 ASBESTOS CONTAINING MATERIAL (ACM)**

An asbestos survey, conducted as part of the *Environmental Survey Report – Asbestos, PCB, Lead Based Paint, and Radon Survey* prepared by ITI of South Florida, Inc. in April 2005, revealed that no confirmed asbestos containing materials (ACM) are located in the administration building or OMS building. The survey did note the occurrence of presumed ACM in the following materials: black vibration dampening cloth located on air handlers in Mechanical Rooms of the administration building, roofing material on both the administration building and OMS building, fire doors located in both buildings, and electrical wiring located in both buildings. Appendix D provides a copy of the survey.

Two fire blankets were observed at the facility during the July 2006 site visit, which historically have been known to contain asbestos materials. It is unclear whether the fire blankets located at the USAR Center contain asbestos.

## **6.6 POLYCHLORINATED BIPHENYL CONTAINING EQUIPMENT**

One pad-mounted transformer is located on Site, just west of the exterior west wall of the administration building (see Photographs 30 and 31 in Appendix B). A label on the transformer indicated that the unit contained less than 2 ppm of PCB fluid. The label also indicated the unit was manufactured in March 1992. During the July 2006 site inspection, the unit appeared to be in good condition and no evidence of leakage was observed.

During the July 2006 site visit, older-style fluorescent light fixtures were observed in the administration and OMS buildings. Older fixtures, especially those that are original to the Site, could potentially contain PCBs. The *Environmental Survey Report – Asbestos,*

*PCB, Lead Based Paint, and Radon Survey* states that all light ballasts inspected in 2005 contained labels stating “No PCB’s”, with the exception of one ballast (Goldstar GB-4X32/FL/120/L) located in the administration building. The ballasts currently present at the Site appear to be in good condition and no leaking dielectric fluid was observed during the site inspection. As such, they are in compliance with Federal and State regulations and have not negatively impacted environmental conditions at the Site. However, if any ballasts that are not marked “No PCBs” are encountered and begin to leak or are removed from service, then they should be assumed to fall under the USEPA definition of PCB equipment and must be managed in accordance with applicable local, State, and Federal regulations.

## **6.7 LEAD**

A lead-based paint (LBP) survey was completed in 2005 as part of the *Environmental Survey Report – Asbestos, PCB, Lead Based Paint, and Radon Survey*. The survey concluded that neither building on Site contains LBP.

## **6.8 RADON**

A site-specific radon survey was conducted at the USAR Center as part of the *2005 Environmental Survey Report – Asbestos, PCB, Lead Based Paint, and Radon Survey*. Passive detection equipment was installed throughout the administration building and OMS building to determine levels of radon gas. Based on the sampling results, no sample locations exhibited radon levels above USEPA’s recommended maximum allowable exposure level of 4 pCi/l; however, many of the radon sample canisters were missing in both buildings at the time of sample collection. Additional sampling canisters were placed in various locations throughout the building to confirm the initial findings. During the July 2006 site visit, sample canisters were observed at the USAR Center. Appendix D provides a copy of the *Environmental Survey Report – Asbestos, PCB, Lead Based Paint, and Radon Survey*.

In addition, the USEPA Map of Radon Zones for Hardin County, Ohio confirms that the county lies within the high priority zone, Zone 1, which has a predicted average indoor screening level greater than USEPA’s recommended maximum allowable exposure level of 4.0 pCi/l. The EDR report provides radon test results for the 43326 zip code area. The results concluded that the basements in the area had an average radon activity level of 5.817 pCi/l, while first floor living areas had an average level of 2.350 pCi/l.

## **6.9 UNEXPLODED ORDNANCE**

No indications were found during the July 2006 site inspection or during the review of records to indicate the presence of unexploded ordnance at the Site.

## **6.10 RADIOACTIVE MATERIALS**

During the July 2006 site inspection and records review process, no indications were found of the past storage or use of radiological commodities at the USAR Center.

## **7.0 REVIEW OF SPECIAL RESOURCES**

### **7.1 LAND USE**

Figure 13 in Appendix A provides a 2005 aerial photograph of the USAR Center and surrounding properties and depicts current land use. According to the City of Kenton's Zoning Administrator, the Site is zoned M-1, Light Manufacturing. The site is located in a mixed-use area that combines commercial, industrial, and residential land uses.

### **7.2 COASTAL ZONE MANAGEMENT**

The Ohio Department of Natural Resources (ODNR) is the lead agency for the Ohio Coastal Management Program (OCMP). The program area includes eight counties that border Lake Erie, with one additional county, Wood County, which does not border Lake Erie. According to the OCMP webpage, the boundary of the coastal management program does not extend into Hardin County.

### **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 less than 1/8<sup>th</sup> - mile northeast of the Site and is associated with the Scioto River basin. Figure 14 in Appendix A provides a map of wetlands in the immediate vicinity of the Site.

During the July 2006 site visit, cattails and other vegetation indicative of saturated areas were observed in the northwestern portion of the Site (see Photograph 32 in Appendix B). The area appeared to have been filled with gravel at some point in time; however, standing water was present. Soils in the vicinity of the Site are from the Pewamo and Blount Series, which are both classified as partially hydric soils (i.e., wetland indicator soils). Although no jurisdictional wetlands are identified at the Site, certain wetland indicators are present at the Site. The Natural Resources Survey report prepared in 2005 did not identify any wetlands 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. Figure 6 in Appendix A provides a map of the 100-year flood plain elevations located in the immediate vicinity of the Site.

### **7.5 NATURAL RESOURCES**

A report entitled *Natural Resources Surveys and Mapping at Selected 88<sup>th</sup> Regional Readiness Command U.S. Army Reserve Facilities in Ohio* was prepared for the 88<sup>th</sup>

RRC by Parsons Corporation in an effort to inventory and manage natural resources found at 88<sup>th</sup> RRC facilities in Ohio and to provide a foundation for future natural resource management. According to the report, the USAR Center did not contain any key natural resources, including wetlands, surface water, floodplains, rare species, and/or the potential for rare species. Based on the developed nature of the site, small size, and lack of sensitive natural resources, no specific natural resources management activities are recommended for this Site. Appendix D contains copies of the Natural Resource Survey Report.

## **7.6 CULTURAL RESOURCES**

A Section 110 cultural resources survey report for the Site was prepared for the 88<sup>th</sup> RRC by the Fort McCoy Archaeological Laboratory in December 1998 – December 1999. The purpose of the survey and subsequent report was to inventory all properties controlled or leased by the 88<sup>th</sup> RRC in the State of Ohio. Historical information, setting and landscape, cultural resources, security, architectural information, and structure descriptions are included for each property. Each site was also assessed for its eligibility to the NRHP. Overall, neither of the buildings at the Site was found to meet the criteria for inclusion in the NRHP. Appendix D provides a copy of the Section 110 survey report.

## **7.7 OTHER SPECIAL RESOURCES**

As reported in the National Wild and Scenic Rivers (WSR) System, there are four designated Wild and Scenic Rivers within the state of Ohio. These rivers include Big Darby Creek, Little Darby Creek, Little Beaver Creek, and Little Miami. In addition to the nationally designated wild and scenic rivers, there are nine state designated scenic rivers within Ohio, including Conneaut Creek, Sandusky River, Olentangy River, Grand River, Upper Cuyahoga River, Maumee River, Stillwater River System, Chagrin River, and Kokosing River. The closest WSRs, Big Darby Creek and the Sandusky River, are located approximately 20 miles south and northeast, respectively from the Site. Based on the location of the WSRs and historical activities conducted at the USAR Center, no activities conducted at the Site would adversely impact any of the designated WSRs.

## 8.0 CONCLUSIONS

The USACE, Louisville District Engineering Division was authorized to conduct an ECP report for the LT Jacob Parrott Memorial USAR Center, located at 1025 South Main Street, Kenton, Hardin County, Ohio 43326 on approximately 4.12 acres of land. The Site is currently vacant, while the last unit to occupy the facility was the 706<sup>th</sup> Transportation Company Detachment. The Site has primarily functioned as an administrative, logistic, and educational facility, with limited vehicle maintenance occurring in the OMS building.

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

- **Use & Storage of CERCLA 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 threshold planning quantities. There is no evidence that the chemicals used or stored were ever improperly handled, released, or disposed at the Site. Therefore, it is not believed that the past use and storage of hazardous substances have negatively impacted environmental conditions at the Site.
- **Petroleum Product Storage** - No petroleum ASTs or USTs are currently present on site, nor have ASTs or USTs ever been located on the Site since the U.S. Government's purchase of the property in 1958.
- **Wash Water Discharge** - A vehicle wash facility located in the OMS building and a kitchen can wash are currently located on Site. The OWS associated with the vehicle wash facility discharges to the municipal sanitary sewer system. It is unclear where the kitchen can wash discharges.
- **PCB Transformers** - One pad-mounted transformer unit is located on Site. A label located on the unit indicates that the fluid contains less than 2 ppm of PCBs. During the July 2006 site inspection, the exterior of the unit appeared to be in good condition and no evidence of leakage was observed.
- **PCB Equipment** - A survey of potential PCB-containing light ballasts was conducted in 2005 as part of an Environmental Survey Report. The survey states that all light ballasts inspected in 2005 contained labels stating "No PCB's", with the exception of one ballast located in the administration building. Based on the construction date of the buildings (1959) it is possible that some of these ballasts could potentially contain PCBs. Since the light ballasts are in service and are not leaking, they are in compliance with Federal and State regulations and have not negatively impacted environmental conditions at the Site. However, if ballasts that

are not marked "No PCBs" begin to leak or are removed from service, then they must be managed in accordance with applicable local, State, and Federal regulations.

- **Asbestos** – A 2005 asbestos survey revealed that no ACM is located in the administration building or the OMS building. The survey did note the occurrence of presumed ACM in the following materials: black vibration dampening cloth located on air handlers in Mechanical Rooms of the administration building, roofing material on both the administration building and OMS building, fire doors located in both buildings, and electrical wiring located in both buildings.
- **Lead-Based Paint (LBP)** – A LBP survey performed in 2005 revealed that no suspect materials sampled contained LBP.
- **Radon** – A radon survey conducted at the Site revealed that all areas tested exhibited radon levels below USEPA's recommended action level of 4 pCi/l.
- **Unexploded Ordnance** - No indications were found during the July 2006 Site inspection or records review process of the past presence of unexploded ordnance at the Site.
- **Radiological Materials** – No radiological materials were stored on Site at the time of the July 2006 Site visit. There is no evidence to suggest that any radiological commodities were ever improperly managed at the Site, or that any radionuclides were ever released.
- **Nearby Properties** - Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site, were evaluated. None of the properties evaluated are considered high risk. "High Risk" properties are those that exhibit environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

In accordance with ASTM Designation D5746-98 (2002), Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities, the Site has been classified as Type 1, an area or parcel of real property where no release, or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).

## 9.0 REFERENCES

### Persons Contacted

- Ms. Lisa Gulbranson, JM Waller Associates, Contractor for 88<sup>th</sup> Regional Readiness Command, Environmental Planner, (612) 713-3752, June 27, 2005
- Mr. Dave Ayers, JM Waller Associates, Contractor for 88<sup>th</sup> Regional Readiness Command, State of Ohio Environmental Manager, July 6, 2006
- SFC Glenn Fleming, 706<sup>th</sup> Transportation Company, Former Occupant and Acting Facility Manager, (419) 525-1893, Ext 3, July 10, 2006
- Ms. Brenda Keckler, City of Kenton, Ohio, email correspondence, July 10-11, 2006
- Mr. Doug Thompson, BUSTR Coordinator for Hardin County, (614) 752-7938, July 14, 2006
- Mr. Archie Lunsey, OEPA, Northwest Voluntary Action Program Coordinator, (419) 373-3035, July 13, 2006

### Resources Consulted

- Aerial Photographs provided by Ohio Department of Transportation dated 1967, 1973, 1974, 1979, 1980, 1988, and 2005.
- Ohio BUSTR UST search engine and Release search engine, <http://www.com.state.oh.us/SFM/bust/>
- National Wild and Scenic Rivers, <http://www.nps.gov/rivers/wildriverslist.html#oh>
- Ohio Coastal Zone Management, <http://www.dnr.state.oh.us/coastal/>
- USEPA Map of Radon Zones, <http://www.epa.gov/radon/zonemap.html>
- FEMA Flood Hazard Insurance Map, <http://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView>
- 88<sup>th</sup> Regional Readiness Command (RRC) Unit Locator Website, <http://www.usarc.army.mil/88thrrsc/units/oh/ohio.asp>
- Federal Regulatory Databases
  - National Priorities List (NPL), April 19, 2006
  - Proposed NPL Sites, April 19, 2006
  - Delisted NPL Sites, April 19, 2006
  - Federal Superfund Liens (NPL Liens), October 15, 1991
  - Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), February 1, 2006
  - CERCLIS No Further Remedial Action Planned Sites (NFRAP), February 1, 2006
  - Resource Conservation and Recovery Information System (RCRIS) Corrective Action Sites (CORRACTS), March 15, 2005
  - Resource Conservation and Recovery Act Information (RCRA), March 9, 2006

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- Emergency Response Notification System (ERNS), December 31, 2005
  - Engineering Controls Sites List (US ENG CONTROLS), March 21, 2006
  - Listing of Brownfields Sites, April 26, 2006
  - Superfund Consent Decrees, December 14, 2004
  - Records of Decision (ROD), March 13, 2006
  - Department of Defense Sites, December 31, 2004
  - Uranium Mill Tailings Sites, November 4, 2005
  - Open Dump Inventory (ODI), June 30, 1985
  - Toxic Chemical Release Inventory System (TRIS), December 31, 2003
  - Toxic Substances Control Act (TSCA), December 31, 2002
  - FIFRA/TSCA Tracking System, March 29, 2006
  - FTTS INSP, March 31, 2006
  - Section 7 Tracking Systems (SSTS), December 31, 2004
  - Integrated Compliance Information System (ICIS), February 13, 2006
  - PCB Activity Database System (PADS), December 27, 2005
  - Material Licensing Tracking System (MLTS), April 12, 2006
  - Mines Master Index File (MINES), February 9, 2006
  - Facility Index System/Facility Registry System (FINDS), April 27, 2006
  - RCRA Administrative Action Tracking System (RAATS), April 17, 1995
  - Biennial Reporting System (BRS), December 31, 2003
  - State and Local Regulatory Databases
    - Division of Emergency Response Database, March 14, 2006
    - DERR Towngas Database, July 28, 1992
    - Master Sites List, March 1, 1999
    - Licensed Solid Waste Facilities, March 28, 2006
    - Historic Landfill, January 1, 1980
    - Leaking Underground Storage Tank File, March 15, 2006
    - Unregulated Tanks with Suspect or Confirmed Releases, August 25, 1999
    - Underground Storage Tank File, March 15, 2006
    - Archived Underground Storage Tank File, March 15, 2006
    - SPILLS – Emergency Response Database, March 22, 2006
    - Engineering Control Sites, March 20, 2006
    - Sites with Institutional Engineering Controls, March 20, 2006
    - Voluntary Action Program Sites, March 6, 2006
    - Drycleaner Facility Listing, April 20, 2006
    - Ohio Brownfields Inventory, January 12, 2006
    - Clandestine Drug Lab Locations, March 22, 2006
    - Urban Setting Designation Sites, March 15, 2006
    - Historic Institutional Controls, May 10, 2005
    - Historic Engineering Controls, May 10, 2005

- Urban Setting Designations Database, May 10, 2005
- Tribal Records
  - Indian Reservations, December 31, 2004

#### Agencies Contacted

- Ohio Department of Transportation, Office of Aerial Engineering
- City of Kenton, Ohio
- Ohio Bureau of Underground Storage Tanks