

FINAL

**ENVIRONMENTAL CONDITION OF
PROPERTY REPORT**

**2LT ALFRED SHARFF
U.S. ARMY RESERVE CENTER OR009
8801 NORTH CHAUTAUQUA BOULEVARD
PORTLAND, OREGON 97217**

Prepared For:

**U.S. Army Corps of Engineers – Louisville District
Engineering Division – Environmental Engineering Branch
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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.

STEPHEN A. RIVERA
Environmental Division ARIM
Chief Environmental Division
70th Regional Readiness Command

DATE

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



LENARD GUNNELL, P.G.
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EXECUTIVE SUMMARY

Lawhon & Associates, Inc. (Lawhon), 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 2LT Alfred Sharff U.S. Army Reserve Center (Facility ID OR009), hereafter referred to as the "Site" or "USAR Center." The Site is located at 8801 North Chautauqua Boulevard, Portland, Oregon, and encompasses approximately 5 acres.

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 5 acres of land, located in a predominantly residential area, in the northeastern portion of the City of Portland, Oregon. The Site consists of two permanent buildings: a 23,269 square-foot administrative building and a 3,670 square-foot outlying organizational maintenance shop (OMS) building. The 671st Engineering Company, the 379th Postal Company, and the 126th Chaplin Detachment currently occupy the USAR Center.

Based on a review of aerial photographs dating back to 1955 and U.S. Geological Survey (USGS) topographic maps dating back to 1954, the Site has served as a USAR Center since 1960. The administration and OMS buildings were constructed in 1960. The U.S. Government owns the land and buildings.

Areas of potential environmental concern were reviewed and Lawhon identified petroleum impacts relating to the USAR use of this property. Petroleum contamination from former heating oil underground storage tanks (USTs) was remediated and the Oregon Department of Environmental Quality (DEQ) issued a No Further Action (NFA) letter in 2001. Tests after cleanup indicated that diesel levels were well below the most stringent cleanup level.

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	iv
List of Appendices	vii
LIST OF ACRONYMS	ix
1.0 Introduction.....	1
1.1 Purpose of Environmental Condition of Property (ECP).....	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.....	7
2.4.1 Surface Water Characteristics	7
2.4.2 Geology/Hydrogeological 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 1989 United States Army Toxic and Hazardous Materials Agency Property Report Database Printout.....	12
3.5.2 2000 Decommissioning of USTs and December 2001 Oregon Department of Environmental Quality Review of UST Decommissioning and Cleanup (No Further Action Required).....	13
3.5.3 2004 Draft Survey of Drains, Pollution Control Equipment, and Discharge Points.....	13
3.5.4 1998 Centennial Contractors Daily Construction Quality Control Report, Wash Rack Removal	14
3.5.5 May 1993 Oil/Water Separators and Storm Drainage System Improvements	14
3.5.6 Asbestos Survey Status Table for the 70 th RRC Facilities	14
3.5.7 1994 Field Report for Lead Abatement at the Portland South Range.....	14
3.5.8 1995 Sharff Hall Spill Prevention Control and Countermeasure Plan	15
3.5.9 2006 Sharff Hall Spill Prevention Control and Countermeasure Plan	15
3.5.10 1996 Facility Environmental Inspection Memo, and 1997 Environmental Compliance Assessment Report.....	16

3.5.11	2001 Oregon Department of Environmental Services Compliance Evaluation Inspection.....	16
3.5.12	2002 Internal Spill Response Incident Report Form	16
3.5.13	1991 Radon Results Printout	16
3.5.14	2003 Record of Environmental Consideration	17
3.5.15	January 2003, Integrated Cultural Resources Management Plan (ICRMP) Historic Properties Component	17
4.0	ADJACENT PROPERTIES.....	18
5.0	REVIEW OF REGULATORY INFORMATION.....	20
5.1	Federal Environmental Records.....	20
5.1.1	Comprehensive Environmental Response, Compensation, and Liability Information System-No Further Remedial Action Planned (CERCLIS-NFRAP)	21
5.1.2	Resource Conservation and Recovery Action Information-Small Quantity Generator (RCRA-SQG)	22
5.1.3	US Brownfields	23
5.1.4	Facility Index System/Facility Registry System (FINDS) Site.....	23
5.2	State and Local Environmental Records	23
5.2.1	Environmental Cleanup Site Information System (ECSI)	24
5.2.2	Oregon Confirmed Release List and Inventory (OR CRL)	25
5.2.3	Solid Waste Facilities/Landfill (SWF/LF)	26
5.2.4	LUST - Leaking Underground Storage Tank List	26
5.2.5	Oregon Areas of Concern (AOC COL).....	27
5.2.6	Registered Underground Storage Tank Database	28
5.2.7	Oregon Manifest	28
5.2.8	Oregon Voluntary Cleanup Sites (OR VCS)	28
5.3	Tribal Environmental Records	28
5.4	EDR Proprietary Records.....	29
5.5	Environmental Regulatory Agency Inquiries.....	29
5.6	Unmapped Sites.....	30
5.7	Summary of Properties Evaluated to Determine Risk to the Site	30
6.0	Site Investigation and Review of Hazards	35
6.1	Aboveground Storage Tanks.....	35
6.2	Asbestos Containing Material.....	35
6.3	Indoor Firing Range	35
6.4	Inventory of Chemicals / Hazardous Substances.....	36
6.5	Lead-Based Paint (LBP).....	36
6.6	Munitions and Explosives of Concern (MEC)	36
6.7	Nearby Properties	36
6.8	Oil/Water Separator	36
6.9	PCB Equipment.....	37
6.10	PCB Transformers	37
6.11	Pits, Sumps, Drywells, and Catch Basins.....	37
6.12	Radioactive Materials	37
6.13	Radon	37

6.14	Underground Storage Tanks	38
6.15	Waste Disposal Sites and Activities	38
7.0	Review of special resources	39
7.1	Land Use.....	39
7.2	Coastal Zone Management.....	39
7.3	Wetlands	39
7.4	100-Year Flood Plain	39
7.5	Natural Resources	39
7.6	Cultural Resources.....	39
8.0	Conclusions.....	40
9.0	Limitations	44
10.0	References	46
10.1	Persons Contacted.....	46
10.2	Resources Consulted.....	46
10.3	Agencies Contacted	49

LIST OF APPENDICES

APPENDIX A: FIGURES

- Figure 1 General Site Location Map
- Figure 2 Site Layout Plan
- Figure 3 Interior Layout of Administration Building First Floor
- Figure 4 Interior Layout of Administration Building Second Floor
- Figure 5 Interior Layout of OMS Building
- Figure 6 1977 USGS 7.5-Minute Topographic Map, Portland, Oregon
- Figure 7 EDR Area Overview Map with Flood Zones, and National Wetland Inventory Information
- Figure 8 1954 USGS 30-Minute Topographic Map, Portland, Oregon
- Figure 9 1961 USGS 7.5-Minute Topographic Map, Portland, Oregon
- Figure 10 1970 USGS 7.5-Minute Topographic Map, Portland, Oregon
- Figure 11 1955 Aerial Photograph
- Figure 12 1970 Aerial Photograph
- Figure 13 1984 Aerial Photograph
- Figure 14 1994 Aerial Photograph
- Figure 15 2000 Aerial Photograph
- Figure 16 2005 Aerial Photograph
- Figure 17 1924 Sanborn Map
- Figure 18 1950 Sanborn Map
- Figure 19 1969 Sanborn Map

APPENDIX B: SITE RECONNAISSANCE PHOTOGRAPHS

APPENDIX C: HISTORIC PROPERTY SEARCH, CHAIN OF TITLE REPORT, AND ENVIRONMENTAL LIEN REPORT

APPENDIX D: PREVIOUS ENVIRONMENTAL SITE ASSESSMENT REPORTS

APPENDIX E: REGULATORY DATABASE SEARCH REPORTS

LIST OF ACRONYMS

ACM	Asbestos Containing Material
AR	Army Regulation
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
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 Structure
DEQ	Oregon Department of Environmental Quality
DOD	Department of Defense
DRMO	Defense Reutilization Marketing Office
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
FEMA	Federal Emergency Management Agency
FMSM	Fuller, Mossbarger, Scott and May Engineers, Inc.
HSWA	Hazardous and Solid Waste Amendments
ICRMP	Integrated Cultural Resources Management Plan
kg	Kilogram
Lawhon	Lawhon & Associates, Inc.
LBP	Lead Based Paint

LQG	Large Quantity Generator
LUST	Leaking Underground Storage Tank
MEC	Munitions and Explosives of Concern
MEP	Military Equipment Parking
NFA	No Further Action
OMS	Organizational Maintenance Shop
OWS	Oil/Water Separator
PCBs	Polychlorinated Biphenyls
pCi/l	PicoCuries per Liter of Air
POV	Privately-Owned Vehicle
RCRA	Resource Conservation and Recovery Act
RQ	Reportable Quantity
RRC	Regional Readiness Command
Site	U.S. Army Reserve Center OR009
SOW	Scope of Work
SPCCP	Spill Prevention, Control and Countermeasure Plan
SQG	Small Quantity Generator
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

1.0 INTRODUCTION

Lawhon & Associates, Inc., Columbus, Ohio was authorized to prepare an Environmental Condition of Property report for the 2LT Alfred Sharff U.S. Army Reserve Center (OR009). The facility is located at 8801 North Chautauqua Boulevard, Portland, Oregon 97217, hereafter referred to as the "Site" or "USAR Center". In support of the ECP Report, a visual reconnaissance of the Site was conducted on September 7, 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 (ECP)

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 approximately 5-acre 2LT Alfred Sharff USAR Center located at 8801 North Chautauqua Boulevard, Portland, Oregon 97217. The property is located in the northeast part of the City of Portland, Oregon approximately 0.5 mile southwest of the Columbia Slough drainage, 1.5 miles northeast of the Willamette River and 2 miles southwest of the Columbia River. The Site is bordered by North Chautauqua Boulevard on the southeast, residential homes on the north, a community center and park on the west, and the Mt. Olivet Baptist Church and administration facility on the southwest.

Site maps and aerial photographs are provided in Appendix A. Appendix B provides photographs taken during the September 2006 Site visit. Appendix C provides an historic property search report, a chain of title report, and an environmental lien report. 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 in the west-central portion of Multnomah County, Oregon, within the city limits of Portland, Oregon. The Site is located in a primarily residential area, which includes homes, a park and a church in the immediate vicinity. Figure 1 in Appendix A provides a general site location map.

2.2 ASSET INFORMATION

Facility Name and Address: 2LT Alfred Sharff U.S. Army Reserve Center OR009
8801 N. Chautauqua Boulevard
Portland, Oregon 97217

Property Owner: United States Government

Date of Ownership: March 11, 1958

Current Occupants: 671st Engineering Company, the 379th Postal
Company, and the 126th Chaplin Detachment

Zoning: Residential

County, State: Multnomah County, Oregon

USGS Quadrangle(s): Portland, Oregon

Section/Township/Range: Section 8, Township 1 North, Range 1 East

Latitude/Longitude: 45° 35' 9.6" N; 122° 42' 24.8" W

Legal Description: Being that parcel or tract of land, consisting of 4.93 acres, more or less, known as Tract A-100, situated and lying in the Northeast $\frac{1}{4}$ of Section 8, Township 1 North, Range 1 East of the Willamette Meridian in the City of Portland, Multnomah County, State of Oregon, Parcel No. 01N01E08AD and Property ID R314794.

2.3 PHYSICAL DESCRIPTION

The USAR Center is situated on approximately 5 acres of land with two permanent structures: a 23,269 square-foot main administration building and a 3,670 square-foot OMS building. Construction of the administration and OMS buildings occurred in 1960. In 2000, renovations were performed in the administration building. In 2005, renovations of the OMS building included an addition to enlarge the structure to its current size and configuration.

The administration building and the OMS building consists of concrete block walls covered with a brick veneer. Both buildings rest upon concrete foundations. The OMS is surrounded on three sides by an asphalt military equipment parking (MEP) areas. Two privately owned vehicle (POV) parking areas are also present at the Site. Photographs 1, and 2 in Appendix B provide views of the POV area. Photographs 3, 4, and 5 in Appendix B provide views of the asphalt MEP area. Chain-link security fencing topped with barbed wire encloses the Site (except the POV area, which is unsecured), including an equipment entrance in the northeast corner of the Site (Photograph 6 in Appendix B). Approximately 90% of the Site is covered by impervious surface features (e.g., asphalt parking areas, driveways, concrete walkways, building footprints, etc.). According to site personnel, the entire MEP area was repaved in 2004. The remaining ground surface is covered by lawn with landscape shrubs and trees (Photograph 7 in Appendix B). Topographically, the Site is relatively flat. Figure 2 in Appendix A provides a current plan view layout of the Site. Appendix B provides photographs taken during the September 2006 site visit.

The USAR Center administration building is a rectangular two-story structure that houses an administration section, connected to a two-story drill hall section by a one story hallway which also houses the kitchen area and offices (Figures 3 and 4 in Appendix A). Photographs 8 and 9 in Appendix B provide front views (southeast side) of the exterior of the building. Photograph 10 in Appendix B provides a view of the southwest corner exterior of the building, and Photograph 11 provides a northeast side view of the exterior of the building. Photograph 12 in Appendix B provides a view of the northwest exterior of the building. Photograph 13 in Appendix B shows the exterior of the drill hall. The interior of the administration building consists of office space, classrooms, kitchen area, storage, and a drill hall. A locked weapons vault is located within the administration building. Site personnel stated that no ammunition is stored or located at the Site. Photographs 14 and 15 in Appendix B provide interior views of the front entry and hall in the administration building. Photograph 16 in Appendix B shows a typical classroom area, while Photograph 17 in Appendix B shows a typical office area. Photograph 18 in Appendix B shows the former indoor firing range area that now acts as a weight and physical fitness training and classroom area. Photographs 19 - 21 in Appendix B show the drill hall and storage cages with company equipment which are located around the outside of the drill hall and in a mezzanine area. Photograph 22 in

Appendix B shows a portion of the kitchen area. Photograph 23 in Appendix B shows the boiler in the mechanical room, while Photograph 24 in Appendix B shows a sump and pump in the south corner of the mechanical room. Photograph 25 in Appendix B shows air conditioner units outside the mechanical room door.

Six interior floor drains are located within the mechanical room and the kitchen area. A grease trap is located in the kitchen under a sink. All interior drains are reported to connect to the city sanitary sewer system.

The original OMS building was a one-story, rectangular structure, with three bays. In 2005 a one-and-a-half story drive through was added at the rear of the original building. At the same time, one of the original bays was remodeled into an entrance and office area. Overhead metal retractable doors are present at opposite ends of the new part of the building which are tall enough to accommodate larger vehicles, and on the two remaining original bays. Photographs 26 - 28 in Appendix B show exterior views of the OMS building.

A 360-gallon double-walled, used oil above ground storage tank (AST) is located within the OMS in the northeast corner. An oil filter crusher is situated adjacent to the AST and is connected so that used oil from the filters goes directly into the AST. On the opposite side of the AST is a Safety Kleen solvent wash station. On the opposite wall in the OMS are an electric air compressor and a 55-gallon drum of grease, which is distributed via the air compressor. The air compressor is relatively new and was installed as part of the oil and lubricant distribution system when the OMS was expanded in 2005. In the rear of the OMS is a drum room that contained three 55-gallon drums of different weight oils, which are distributed via a hose system run by the compressor. The interior of the OMS is large enough to accommodate four bay work stations, two in the older part and two in the new part of the building. Photographs 29 – 34 in Appendix B show interior views of the OMS. Figure 5 in Appendix A provides a layout of the interior of the OMS building.

Two portable hazmat storage sheds (Photograph 35 in Appendix B) are located north of the OMS building along with six non-permanent metal Container Express (CONEX) structures (Photograph 36 in Appendix B). During the site visit, personnel stated that the CONEX structures contained engineering support equipment which is used off-site. One of the hazmat sheds contained approximately 16 empty 5-gallon fuel cans, a portable generator and a fire proof cabinet with aerosol cans and various less than 5-gallon containers of a variety of routinely used materials (Photographs 37 and 38 in Appendix B). The other hazmat shed contained empty 5- and 55-gallon drums, oxygen and acetylene gas tanks, and numerous discharged fire extinguishers (Photograph 39 in Appendix B).

Ten exterior surface storm drains are distributed around the site, as are five dry wells, all built to handle storm water runoff. It is reported that nine of the exterior drains

ultimately go to an oil/water separator (OWS), which is located on the northeast portion of the Site adjacent to Chautauqua Boulevard (Photograph 40 in Appendix B). The OWS reportedly joins the city sanitary sewer. One of the exterior drains discharges to a drywell. All five drywells have gravel bottoms and slotted sides for infiltration (See Section 3.5.3 and accompanying report in Appendix D).

At the time of the September 2006 Site visit, a variety of military trucks, trailers and equipment were located in the MEP. Much of the equipment was for temporary bridge building, and included a number of boats on trailers. Two mobile fuel trucks were present and, according to site personnel, were empty at the time of the Site visit.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Figure 6 in Appendix A provides a portion of the 1977 Portland, Oregon, USGS topographic map which includes the Site. As shown, the Site is situated at an elevation of approximately 98 feet above mean sea level and slopes gently northeast towards the Columbia Slough and the Columbia River. Surface water runoff at the Site is directed towards storm drains and drywells situated in paved and unpaved portions of the Site and to storm water drains in adjoining roadways. Additional information concerning the drains at the Site is discussed in Section 3.5.3.

No surface water features are located in the immediate vicinity of the Site. The Columbia Slough drainage is the closest surface water feature to the site and is located approximately 0.5 mile northeast of the Site. In addition, the Willamette River is located approximately 1.5 miles southwest of the Site, and the main part of the Columbia River lies approximately 2 miles northeast of the Site. The Columbia Slough and the Willamette River meet the Columbia River northwest of the Site, which ultimately discharges to the Pacific Ocean.

According to the EDR Report which references the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Panel 4101830020D, the Site is not included in either the 100-year flood plain elevation or the 500-year flood plain elevation. Figure 7 in Appendix A provides a map depicting the extent of the nearest 100-year flood plain in relation to the Site.

2.4.2 Geology/Hydrogeological Characteristics

Geology information was obtained from the Oregon Department of Geology and Mineral Industries (personal communication, Niewendorp, 2007). The Portland Oregon area lies within the Willamette Valley or basin physiographic province between the Western Cascades and Oregon Coastal Range (Orr, 1999). According to information in the EDR Report acquired from the Soil Conservation Service's (Natural Resource Conservation

Service) State Soil Geographic Database for Multnomah County, Oregon, the specific type of soil at the Site is categorized as Urban Land. According to information provided in the EDR Geocheck Report, this soil does not meet the requirements for a hydric soil. Urban Land soils are variable and highly disturbed by development. Much of the area is paved and soils are not exposed. Past urban development also has produced numerous areas of cut and fill, which also adds to the variable nature of the soils.

According to information in Appendix E, EDR Report, groundwater depth in the nearest wells is in excess of 70 feet. Groundwater flow direction from the Site is most likely towards the northeast and the Columbia Sough, which drains into the Columbia River.

2.5 SITE UTILITIES

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

Sanitary Sewer System – The City of Portland 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 stormwater.

Gas & Electric – Portland General Electric provides electric service to the Site, while gas service is provided by Northwest Natural Gas Company.

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 eighteen wells located within a 1 mile radius of the Site. None of the wells are directly adjacent to the Site, and only one of the wells is within ½ mile of the Site. That well appears to be located down gradient or cross gradient to the site. It is listed as a groundwater well within an unconfined aquifer in Quaternary alluvium. The most recent groundwater level in this well reported in 1995 is in excess of 73 feet. The majority of the other wells are located along an industrial area adjacent to the Columbia Slough. The purpose of these wells is not specified, other than “groundwater other than spring” and, “single well, other than collector or Ranney type”. This area is industrial, and most likely the wells are associated with industrial development in this area. No information regarding contamination of the wells is presented in the state and federal databases presented in the EDR report in Appendix E. Groundwater flow direction from the Site is most likely towards the northeast and the Columbia Sough, which runs parallel with the Columbia River.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Land titles for the Site were reviewed back to 1952. Appendix C contains Chain of Title and Environmental Lien reports completed for the Site. The Environmental Lien report did not identify any environmental liens against the USAR Center property. According to the Chain of Title report, a Quit Claim Deed granted the property from the United States of America through the Public Housing Administration to the Housing Authority of Portland. Then in 1958, a Deed shows the property returning to the United States of America from the Housing Authority of Portland.

Available business directories including City, cross-reference, and telephone directories were reviewed, if available, at approximately five-year intervals for the years spanning 1964 through 2005. According to a City Directory provided by EDR and dated July 18, 2006, the address of the USAR Center was first listed in the research source (Polk's City Directory) in 1964 as US Department of Defense (US Army Reserve Center). The listing continues until 1986 when it changes to Sharff Hall Training Center and then in 1996 as just US Army Reserve. The only other property of note is at 8725 Chautauqua Boulevard which is first listed in 1964 as a bowling lane, then in 1969 as the Portland Sports Arena, then along with a flea market in 1979 and finally as Song of Hope Church in 1996. This address and building, which is situated immediately southwest of the Site, is currently the administration building for the Mt. Olivet Baptist Church, which sits further south. A copy of the City Directory report is included in Appendix E.

3.2 PAST USES AND OPERATIONS

In 1958, the U.S. Government acquired approximately 5 acres of land from the Housing Authority of Portland. Construction of the administration building and OMS occurred in 1960. A historic map review suggests that the Site was formerly part of a residential apartment complex prior to the construction of the USAR Center. The Site has served as a reserve and mobilization center for the U.S. Army Reserve since the administration building was constructed in 1960.

The USAR Center is currently occupied by the 671st Engineering Company, the 379th Postal Company, and the 126th Chaplin Detachment. Historically, the Site primarily functioned as an administrative, logistical, and educational facility. The Site was historically used by reservists for drill activities on various weekends. The 671st is an engineering company specializing in portable bridges.

Currently and historically, the OMS building has been used to perform limited maintenance activities on military vehicles and equipment. Activities inside the OMS building include general vehicle servicing such as performing oil changes and preventative maintenance checks. Based on review of a historic Site plan contained in

the Spill Prevention Control and Countermeasure Plan (SPCCP) (Section 3.5.8) prepared in 1995, an AST shed with a sandbag berm was formerly situated on the northwestern portion of the Site on a gravel surface. A Facility Environmental Inspection Memo from 1996 states that the AST would soon be removed. At the time of the September 2006 Site reconnaissance, this area contained six CONEX portable containers and has been paved with asphalt.

Another feature depicted on the SPCCP Site plan is a wash rack and associated OWS located south of the OMS Building. Based on documented information provided by the 70th RRC, the wash rack and OWS were removed and the drain capped by an outside contractor in 1998. The current OWS system was reportedly installed in approximately 1993 to treat runoff from various parts of the Site.

Historic documents, personnel interviews, historical aerial photographs, Sanborn Insurance maps, and topographic maps were the primary sources of information on the past use and operations at the Site and adjacent properties. Figure 6 and Figures 8 - 19 in Appendix A provide USGS topographical maps, aerial views, and Sanborn maps of the Site and surrounding area in 1924, 1950, 1954, 1955, 1961, 1969, 1970, 1977, 1984, 1994, 2000, and 2005.

The overall development of the area is best shown on the historical Sanborn Fire Insurance maps from 1924, 1950, and 1969 (Figures 17, 18, and 19 in Appendix A). The map from 1924 shows no structures in the area of the Site. As best can be determined by using the maps from subsequent years, the Site lies between Washburne and Fowler Avenues, from Houghton Road south. This block shows no structures. The 1950 Sanborn map shows much change from the 1924 map. The area is dominated by residential apartments. Fowler Avenue has been truncated south of the Site and the addition of Bataan creates the triangular area between Bataan, Houghton and N. Chautauqua which is to become the USAR Center parcel. The Sanborn map from 1969 again shows much change in the character and layout of the area. The USAR Center is present on the map, showing both the administration and OMS buildings. The general character of the area has turned from residential apartments to single family homes. In addition, a park, west of the Site, has been formed in part by eliminating a portion of Houghton Road. The former Fowler Avenue and Bataan Road have merged with Chautauqua Boulevard south of Hunt to create North Chautauqua Boulevard in its present day layout. Also observed west of the Site and south of the park is the Portland Sports Arena, which today is the administration center for Mt. Olivet Church.

The 1954 USGS topographical map (Figure 8 in Appendix A) shows no structures as are seen in the Sanborn maps in the vicinity of the Site. The aerial photograph from 1955 (Figure 11 in Appendix A), however, shows numerous apartment complexes in the vicinity of the Site, and the creation of the park to the west of the site.

USGS topographical maps from 1961, 1970, and 1977 (Figures 9, 10, and 6, in Appendix A) and the aerial photographs from 1970, 1984, and 1994 (Figures 12, 13, and 14 in Appendix A) show the Site generally as it is today and the predominantly residential nature of the area. The building immediately southwest of the site is seen on all these maps and aeriels. This structure has a history of being a bowling lane, a sports arena, a flea market, a church and currently as the administration building for the Mt. Olivet Baptist Church.

Figures 15 and 16 in Appendix A are aerial photographs of the Site from the City of Portland GIS Map website (<http://www.portlandmaps.com>). The construction of the OMS addition which took place in 2005 and the 2004 asphalt re-pavement of the Site are clearly visible on the 2005 aerial and not on the 2000 aerial.

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 closets located in the administration building. Small amounts of vehicle maintenance products were stored within the designated flammable materials cabinet in the OMS building, and currently are stored in one of the hazmat sheds.

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 (other than that reflecting very dry weather conditions) was observed during the September 2006 site visit.

3.4 PAST PRESENCE OF BULK PETROLEUM STORAGE TANKS

Based on review of a historic Site plan contained in the SPCCP prepared in 1995, an AST shed with a sandbag berm was formerly situated on the northwestern portion of the Site on a gravel surface. A Facility Environmental Inspection Memo from 1996 states that the AST would soon be removed, along with the wooden shed it was contained in. At the time of the September 2006 Site reconnaissance, this area contained six CONEX portable containers and has been paved with asphalt. Currently, one 360-gallon used oil AST is present at the Site, located within the OMS building. The AST is a double-walled tank with a built-in secondary containment.

According to site personnel no underground petroleum storage tanks are currently present on the Site. In addition, no evidence of current USTs was observed on the Site during the Site reconnaissance. Site records, however, show some discrepancy. One document from a 1989 Army Site report shows that three heating oil tanks were present at that time; one 680-gallon, one 5,000-gallon, and one 10,000-gallon. A different record from the DEQ from 2001, indicates that two 675 and a 10,000-gallon diesel USTs were decommissioned and removed from the Site. It appears that the 1989 report may have been incorrect, or otherwise there may be additional tanks at the Site. There is no information regarding the location or former location of any of the tanks.

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 are provided in Appendix D.

3.5.1 1989 United States Army Toxic and Hazardous Materials Agency Property Report Database Printout

This facility data report identifies nine areas of hazardous materials;

- A POL storage shed, containing a 400-gallon AST,
- A drum storage area with four 55-gallon drums of waste oil, waste solvent, and waste antifreeze,
- A paint storage room with 50-gallons of paint and spray paint located inside the OMS,
- A portable parts cleaner with 2-gallons of waste solvent,
- A brake changing area with no special procedures to contain asbestos during brake work,

- A vehicle wash rack and OWS with oil and grease from vehicle wash water (the report states that the OWS is emptied as needed by arrangement with the Vancouver Barracks),
- A 680-gallon heating oil UST, “installed in 1971 (approx.) was taken out of service in 1988...no evidence of leaks, tentatively planned for removal”,
- A 5000-gallon heating oil UST, “installed in 1956 (approx.), provides backup heating fuel for natural gas. Not leak tested, no evidence of leaks”,
- A 10,000-gallon heating oil UST, “installed in 1956 (approx.), provides backup heating fuel for natural gas. Not leak tested, no evidence of leaks”. The report notes that this tank is registered with the state.

3.5.2 2000 Decommissioning of USTs and December 2001 Oregon Department of Environmental Quality Review of UST Decommissioning and Cleanup (No Further Action Required)

These documents show that the DEQ indicates two 675 and one 10,000-gallon diesel USTs were decommissioned and removed from the Site. Diesel contamination was discovered during the decommissioning and approximately 275 tons of contaminated soil was excavated and taken to the appropriate landfill. Tests after cleanup indicated that diesel levels were well below the most stringent cleanup level for diesel. Accordingly, no further action was required by the DEQ. There is no information regarding the location or former location of any of the tanks.

3.5.3 2004 Draft Survey of Drains, Pollution Control Equipment, and Discharge Points

A 2004 Survey of Drains, Pollution Control Equipment, and Discharge Points identified ten exterior surface storm drains, five dry wells, and an OWS at the Site. In addition, six interior floor drains are located within the mechanical room and the kitchen area. A grease trap is located in the kitchen under a sink. All of these structures were observed during the 2006 Site visit and appeared to be in functioning condition.

According to the report, the interior drains are tied into the City’s sanitary sewer system. The report states that the grease trap also discharges to the sanitary sewer system. In addition, the report states that nine of the exterior drains ultimately go to the OWS and joins the city sanitary sewer. One of the exterior drains discharges to a drywell. All five drywells have gravel bottoms and slotted sides for infiltration. A sump is located in the mechanical room which also discharges to the city sanitary sewer.

3.5.4 1998 Centennial Contractors Daily Construction Quality Control Report, Wash Rack Removal

Centennial Contractors Daily Construction Quality Control Report between September 16 and September 21, 1998 states that they did demolition work of the wash rack and a catch basin, believed to be the old OWS. No information related to whether or not surrounding soils were sampled during excavation and demolition and no figures were associated with the removal documentation. Based on historic Site plans contained in other pertinent records reviewed for the Site, however, the former wash rack was situated south of the OMS building.

3.5.5 May 1993 Oil/Water Separators and Storm Drainage System Improvements

KPFF Consulting Engineers prepared this report (dated May 21, 1993) for numerous USAR Center locations throughout Oregon and Washington. The existing Site drainage is collected through a series of catch basins, pipes and manholes to the north then east out to Chautauqua Boulevard. The proposed improvements included a single coalescing plate-type OWS installed in-line along the existing storm pipe running out to Chautauqua Boulevard. The report also states that existing pipe grades do not allow for a high flow bypass system.

3.5.6 Asbestos Survey Status Table for the 70th RRC Facilities

A table provided by the 70th RRC listing the status of ACM surveys for its facilities, shows that an asbestos survey has been performed at the Site in May 1994. It also states that the report was combined with the Webb and Sears facilities. No results or other information was available.

3.5.7 1994 Field Report for Lead Abatement at the Portland South Range

Performance Abatement Services prepared this report (dated June 27, 1994) which documents lead abatement activities associated with an indoor firing range at Sharff Hall. Field work conducted included removing all office equipment from the area, which was wet wiped. Then all steel plating and one deflector shield were removed. The sand from the trap was screened, tested, and bagged. Finally, the entire facility was push broom cleaned, HEPA vacuumed, and pressure washed. After cleaning, five random locations were sampled and qualitative results did not indicate the presence of lead. The report concluded that the Site "is free of lead contamination due to past use as a firing range." During the September 2006 Site visit, this room was observed to be occupied by a physical training weight room and a classroom.

3.5.8 1995 Sharff Hall Spill Prevention Control and Countermeasure Plan

The SPCCP was prepared by Woodward-Clyde, Inc. to outline the routine steps to be taken in the event of a spill in daily operations to reduce the amount of waste generated and likelihood of a spill. The report describes the facility as being equipped with the following operations and storage areas:

- Three-bay maintenance shop and parts storage room,
- Conex storage trailers,
- Empty and out of service AST located in a shed surrounded by a sand bag berm,
- 2 Flammable material storage buildings,
- Wash rack and adjacent OWS (discharge point unknown), and
- Administration offices.

Hazardous materials reported for the Site include lubricants, adhesives, sealants, cleaners, solvents and welding gases. A figure contained in this report shows a wash rack and associated OWS situated west of the OMS Building. The Site layout plan also depicts the surface water flow pattern to flow toward storm drains located in the asphalt paved areas. The interior of the OMS Building depicts three service bays, 2 offices, and a parts room. Tables which contain information related to the use, storage and management practices (including frequency of disposal) are provided in this report.

3.5.9 2006 Sharff Hall Spill Prevention Control and Countermeasure Plan

The SPCCP was prepared by Shaw Environmental, Inc. to outline the routine steps to be taken in the event of a spill in daily operations to reduce the amount of waste generated and likelihood of a spill. The report describes the facility as having the following inventory:

- One 360-gallon double walled AST,
- One 2,500-gallon mobile diesel fuel truck,
- Three 55-gallon drums of new oil.
- Eight 55-gallon drums of various lubricants, grease, transmission fluid, brake fluid, antifreeze, etc., and
- Two 55-gallon drums of used oil.

A Site layout plan depicts the surface water flow pattern to flow toward storm drains located in the asphalt paved areas. Also shown is a concrete pad where vehicles are currently washed and the lines that drain it to the OWS prior to discharging to the city sanitary sewer.

3.5.10 1996 Facility Environmental Inspection Memo, and 1997 Environmental Compliance Assessment Report

The U.S. Army Reserve performed internal surveys in 1996 and 1997 listing and evaluating areas on the Site where environmental concerns were apparent. Various areas were noted in each of the reports as needing correction at the time of the assessment. None of the deficiencies observed appeared to pose an immediate risk to human health or the environmental condition at the Site. The comments generally addressed records and housekeeping issues. Specific items to note include comments related to the emptying of the old AST in the 1996 report and that the shed that it was in it to be removed "in the next two weeks", and the 1997 report states "An asbestos survey was conducted on 18 NOV 1993. Significant amounts of asbestos have been removed in accordance with this survey". There is no indication in the report where or when asbestos had been removed from the facility.

3.5.11 2001 Oregon Department of Environmental Services Compliance Evaluation Inspection

This letter document summarizes an environmental inspection of the USAR Center on October 3, 2001. The report states "that Sharff Hall was in compliance with all hazardous waste generator regulations".

3.5.12 2002 Internal Spill Response Incident Report Form

This form identifies a spill of approximately 10-gallons of 10W hydraulic oil from a ruptured hose on October 5, 2002. The reports also states that the spill was contained with a sorbent dam, and that absorbent pads and Lite-dri absorbent were used to clean up the spill. All materials were then bagged, put in a drum and placed in the hazmat storage shed. No information regarding the disposal of the drum is provided.

3.5.13 1991 Radon Results Printout

Results of a 1991 radon survey conducted in eight locations at the Sharff USAR Center show that all eight samples resulted in levels well below the USEPA's recommended maximum allowable exposure level of 4 pCi/l.

3.5.14 2003 Record of Environmental Consideration

This document describes the proposed addition to the OMS which was completed in 2005. It identifies the project as qualified for a Categorical Exclusion because the construction would not significantly alter land use. The report states that ACM is present in the OMS building, and that prior to construction, samples should be taken and analyzed to protect human health and the environment.

3.5.15 January 2003, Integrated Cultural Resources Management Plan (ICRMP) Historic Properties Component

This report was compiled by Parsons, Inc., in conjunction with the USARC. The Historic Properties Component was documented in order to comply with Section 106 of the National Historic Preservation Act. The INCRMP states that “to date, there are no properties of traditional religious and cultural importance identified on the 70th RRC facilities within the state of Oregon.” Other pertinent information contained in the ICRMP included soils and geology for the region of the Site which is provided in Section 2.4.2.

4.0 ADJACENT PROPERTIES

Figure 16 in Appendix A provides a 2005 aerial view of the Site and adjacent properties. The majority of property surrounding the Site is residential, and the land immediately west of the Site is park open space. Refer to Table 1, Figure 16 in Appendix A, photographs in Appendix B where noted, for the following discussion of adjacent properties.

Land immediately north of the Site are single family residential properties on N. Alaska Street (Photograph 41 in Appendix B).

N. Chautauqua Boulevard borders the Site on the east and southeast. Properties across Chautauqua Boulevard are all single family residences (Photograph 42 in Appendix B).

Land immediately southwest of the Site is zoned commercial neighborhood business, and is the location of the Mt. Olivet Baptist Church and its administration building. The church administration building has a history of being a bowling alley, a sports arena, a flea market, and a church (Photograph 43 in Appendix B).

Immediately west of the site is University Park and community center. The land directly adjacent the site is open space, and is zoned as such (Photograph 44 in Appendix B).

TABLE 1 LIST OF ADJACENT PROPERTIES			
Direction From Site	Name/Type of Property	Address	Zoning
North	Single Family Residences/ N. Alaska St.	Various N. Alaska St.	Residential
East/South east	N. Chautauqua Boulevard/ Single Family Residences	Various N. Chautauqua Blvd.	Residential
Southwest	Mt. Olivet Baptist Church and Administration Building	8501 and 8725 N. Chautauqua Blvd.	Commercial Neighborhood Business
West	University Park	None	Open Space

Appendix A 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 immediately 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.

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. Acronyms used in Tables and text throughout this section are defined in the EDR report 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.

5.1 FEDERAL ENVIRONMENTAL RECORDS

The regulatory information presented in Table 2 below 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
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
CERCLIS-NFRAP	0.500		0	0	1	NR	NR	1
CORRACTS	1.000		0	0	0	0	NR	0
RCRA TSD	0.500		0	0	0	NR	NR	0
RCRA LQG	0.250		0	0	NR	NR	NR	0
RCRA SQG	0.250	X	1	0	NR	NR	NR	2
ERNS	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
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	1	NR	NR	1
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
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		NR	NR	NR	NR	NR	0
FINDS	TP	X	NR	NR	NR	NR	NR	1
RAATS	TP		NR	NR	NR	NR	NR	0

Acronyms – are defined in detail in the attached EDR Report, Appendix E
 TP=Target Property (the Site) NR=Not Requested at this Search Distance

5.1.1 Comprehensive Environmental Response, Compensation, and Liability Information System-No Further Remedial Action Planned (CERCLIS-NFRAP)

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA’s knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information

indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

According to the EDR report, there is 1 CERCL-NFRAP site within approximately 0.5 miles of the target property:

- Northwest Cast Metal Products, 9200 N. Endicott (1/4-1/2 NE)

This parcel is topographically lower, down gradient, and sufficiently distant from the USAR Center, and therefore is not a concern.

5.1.2 Resource Conservation and Recovery Action Information-Small Quantity Generator (RCRA-SQG)

RCRAInfo is USEPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by RCRA. Conditionally exempt small quantity generators generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste.

The Sharff USAR Center is listed as being a RCRA small quantity generator. In addition, according to the EDR report, there is 1 RCRA-SQG site within 0.25 miles of the target property:

- Mt. Olivet Baptist Church, 8501 N. Chautauqua Blvd. (0-1/8 SW)

Although this property is at a higher or equal elevation, the Church is on this database as a Small Quantity Generator with no violations. It is not a concern for the USAR Center.

5.1.3 US Brownfields

The EPA's listing of Brownfields properties addressed by Cooperative Agreement Recipients and Brownfields properties addressed by Targeted Brownfields Assessments.

According to the EDR report, there is 1 US Brownfields site within approximately 0.5 miles of the target property:

- Columbia Villa Property, 8910 Woolsey Ave. North (1/4-1/2 W)

This site is a housing redevelopment project, in which lead paint and lead contaminated soil around demolished structures was an issue. It is sufficiently distant to the USAR Center and therefore is not a concern.

5.1.4 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 EDR report includes the following FINDS databases in this report: Permit Compliance System, Aerometric Information Retrieval System; Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes, Federal Underground Injection Control; Criminal Docket System used to track criminal enforcement actions for all environmental statutes; Federal Facilities Information System, State Environmental Laws and Statute, and Polychlorinated Biphenyl PCB Activity Data System.

According to the EDR report, the USAR Center is in the FINDS list. There is no specific additional information provided in the EDR report.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented below was obtained from the EDR State and Local regulatory database search report. Sites identified by this database search are discussed in the following subsections.

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
State Haz. Waset – ECSI	1.000		0	0	4	11	NR	15
OR CRL	1.000		0	0	0	4	NR	4

**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
State Landfill	0.500		0	0	1	NR	NR	1
UIC	0.250		0	0	0	NR	NR	0
HIST LF	0.500		0	0	0	NR	NR	0
LUST	0.500	X	0	16	82	NR	NR	99
AOC COL	1.000		0	0	NR	1	NR	1
UST	0.250	X	0	0	NR	NR	NR	1
AST	0.250		NR	NR	NR	NR	NR	0
MANIFEST	0.250	X	0	0	0	NR	NR	1
OR SPILLS	TP		NR	NR	NR	NR	NR	0
OR HAZMAT	TP		NR	NR	NR	NR	NR	0
ENG CONTROLS	0.500		0	0	NR	NR	NR	0
INST CONTROL	0.500		NR	NR	NR	NR	NR	0
VCS	0.500		NR	NR	2	NR	NR	2
DRYCLEANERS	0.250		0	0	NR	NR	NR	0
BROWNFIELDS	0.500		0	0	0	NR	NR	0
CDL	TP		NR	NR	NR	NR	NR	0
AIRS	TP		NR	NR	NR	NR	NR	0
HSIS	TP		NR	NR	NR	NR	NR	0

Acronyms – are defined in detail in the attached EDR Report, Appendix E
 NR=Not Requested at this Search Distance

5.2.1 Environmental Cleanup Site Information System (ECSI)

The Environmental Cleanup Site Information System records information about sites in Oregon that may be of environmental interest. The data obtained in the EDR report came from the Department of Environmental Quality.

According to the EDR report, there are 15 sites within 1 mile of the target property.

- Columbia Villa Maintenance Facility, 8910 N. Woolsey Ct. (1/4-1/2 W)
- Airgas Nor Pac, 3591 N. Columbia Blvd. (1/4-1/2 NNE)

- Mitchell Brothers Truck Lines, 3841 N. Columbia Blvd. (1/4-1/2 N)
- Name of Site Not Reported, 3131 N. Columbia Blvd. (1/4-1/2 ENE)
- Pacific Carbide & Alloys Co., 9901 N. Hurst Ave. (1/2-1 N)
- NW Cast/Universal Silver, 9233 N. Calvert Ave. (1/2-1 ENE)
- Pacific Meat Co., 2701 Newark St. (1/2-1 ENE)
- Gallus, Inc., 9425 N. Burrage Ave. (1/2-1 ENE)
- General Electric Industrial Co., 2410 N. Columbia Blvd. (1/2-1 E)
- Goodyear Distribution Center, 2344 N. Columbia Blvd. (1/2-1 E)
- Name of Site Not Reported, 5001 N. Columbia Blvd. (1/2-1 NW)
- Name of Site Not Reported, 2301 N. Columbia Blvd. (1/2-1 E)
- Blasen & Blasen Lumber Co., 2155 N. Columbia Blvd. (1/2-1 E)
- Ferguson Enterprises, Inc., 2121 N. Columbia Blvd. (1/2-1 E)
- Familian NW, 1945 N. Columbia Blvd. (1/2-1 E)

All of these sites are sufficiently distant, down gradient, or have environmental concerns with very little or no probability of impacting the USAR Center. Only one site is at a higher or equal elevation, and that site is the Columbia Villa Maintenance, which is a housing redevelopment project, in which lead paint and lead contaminated soil around demolished structures was an issue. It is sufficiently distant to the USAR Center and therefore is not a concern.

5.2.2 Oregon Confirmed Release List and Inventory (OR CRL)

Sites that are or may be contaminated and may require cleanup.

According to the EDR report, there are 4 OR CRL sites within 1 mile of the target property:

- Pacific Carbide & Alloys Co., 9901 N. Hurst Ave. (1/2-1 N)
- NW Cast/Universal Silver, 9233 N. Calvert Ave. (1/2-1 ENE)

- Pacific Meat Co., 2701 N. Newark St. (1/2-1 ENE)
- Name of Site Not Reported, 2301 N. Columbia Blvd. (1/2-1 E)

All of these sites are topographically lower, down gradient and sufficiently distant to the USAR Center and therefore are not a concern.

5.2.3 Solid Waste Facilities/Landfill (SWF/LF)

The Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data come from the Department of Environmental Quality's Closure & Regular Solid Waste Active Disposal Permits Database.

According to the EDR report, there is 1 SWF/LF site within 0.5 miles of the target property:

- Malarkey Landfill, 3131 N. Columbia Blvd. (1/4-1/2 ENE)

This site is topographically lower, down gradient and sufficiently distant to the USAR Center and therefore is not a concern.

5.2.4 LUST - Leaking Underground Storage Tank List

Leaking Underground Storage Tank (LUST) Incident Reports records contain an inventory of reported leaking underground storage tank incidents. The data obtained in the EDR report was from the Department of Environmental Quality's LUST Database List.

Sharff USAR Center is listed on the LUST database, but is labeled as cleanup completed. This leaking is associated with USTs that were decommissioned and removed.

According to the EDR report, there are 98 LUST sites within 0.5 miles of the target property. Of the 98 LUST cases listed on this database, 82 are listed as closed. There are 16 sites that do not have a reported cleanup date. The 16 properties without clean up dates are as follows:

- Eric Holen, 8831 N. Wayland (1/8-1/4 W)
- D Fleskes, 3430 N Willis Blvd. (1/4-1/2 ESE)
- R Martinelli, 81801 N Washburne (1/4-1/2 SSE)

- Wecker Construction, 4414 N Willis (1/4-1/2 WSW)
- Vince Caillovette, 8000 N Fowler (1/4-1/2 S)
- James Glass, 8323 N. Emerald (1/4-1/2 ESE)
- D Adam, 3155 N. Arlington Place (1/4-1/2 ESE)
- Wayne & Roxanne Henry, 8000 N. Woolsey Ave. (1/4-1/2 SW)
- Sharon Mullins, 8825 N Fiske (1/4-1/2 W)
- Devin Stross, 3837 N Baldwin (1/4-1/2 S)
- M Luttrell, 3154 N Watts (1/4-1/2 SE)
- Don & Leatha Tyra, 8520 N Hamlin Ave. (1/8-1/4 ESE)
- Florence Shields, 8502 N Hamlin Ave. (1/8-1/4 ESE)
- Gerda Cox, 8415 N Drummond Ave. (1/4-1/2 ESE)
- Redbird Estate, 8947 N Curtis (1/4-1/2 ENE)
- Doug Thayer, 3054 N Willis (1/4-1/2 ESE)

Five of these sites are topographically lower and down gradient from the USAR Center. Ten of the remaining eleven sites are all heating oil spills at single family residences where the volume of spills would normally be small and would have little potential of impacting the USAR Center. The remaining property, Wecker Construction, is also a heating oil spill, and is sufficiently distant, and therefore is not a concern.

5.2.5 Oregon Areas of Concern (AOC COL)

Oregon Areas of Concern List.

According to the EDR report, there is 1 AOC COL site within 1 mile of the target property:

- Columbia Slough, Portland Rd. (1/2-1 N)

This site is a drainage slough and is topographically lower, down gradient, and sufficiently distant to the USAR Center and therefore is not a concern.

5.2.6 Registered Underground Storage Tank Database

USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Sharff USAR Center is listed on the UST database most likely because of the presence former UST's.

5.2.7 Oregon Manifest

Sites on this database have manifest information with the State of Oregon. Sharff USAR Center is listed on the manifest database. No additional information is provided, however, presence on this list only means that hazardous waste has been removed from the Site and disposed of at some time in the past that required a manifest be filed with the State of Oregon.

5.2.8 Oregon Voluntary Cleanup Sites (OR VCS)

Responsible parties have entered into an agreement with DEQ to voluntarily address contamination associated with their property.

According to the EDR report, there are 2 VCS sites within 0.5 miles of the target property:

- Columbia Villa Maintenance Facility, 8910 N. Woolsey Ct. (1/4-1/2 W)
- Airgas Nor Pac, 3591 N Columbia Blvd. (1/4-1/2 NNE)

Columbia Villa Maintenance is a housing redevelopment project, in which lead paint and lead contaminated soil around demolished structures was an issue. It is sufficiently distant to the USAR Center and therefore is not a concern. Airgas Nor Pac is topographically lower, down gradient, and sufficiently distant to the USAR Center and therefore is not a concern.

5.3 TRIBAL ENVIRONMENTAL RECORDS

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

TABLE 4 TRIBAL DATABASE SEARCH								
Database	Search	Target	<1/8	1/8 –	1/4 –	1/2 – 1	>1	Total

	Distance (miles)	Site		1/4	1/2			
Indian Reservation	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
 NR=Not Requested at this Search Distance

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 below 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	TP		NR	NR	NR	NR	NR	0
EDR Historical Cleaners	TP		NR	NR	NR	NR	NR	0

Acronyms – are defined in detail in the attached EDR Report, Appendix E
 TP=Target Property (the Site) NR=Not Requested at this Search Distance

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

5.5 ENVIRONMENTAL REGULATORY AGENCY INQUIRIES

Information regarding the Site was requested from the following local government agencies. A summary of information obtained from the agencies contacted is presented below. Correspondence and information obtained from agencies is provided in Appendix D.

The following divisions of the DEQ were contacted to request environmental records available for the Site:

- Air Quality Program - An environmental records review was requested August 10, 2006 from the Division of Air Quality. The reply dated August 15, 2006, states that they had no environmental records for the Site.
- Division of Land/UST - An environmental records review was requested August 10, 2006 from the Division of Water Quality. The reply dated August 15, 2006, included a decommissioning of unregistered USTs document for the Site.
- A public records request form was submitted to the ODEQ on August 17, 2006. Documents were sent back regarding RCRA-SQG disposal records and a No Further Action letter regarding the decommissioning and cleanup of the former UST on Site.

5.6 UNMAPPED SITES

Thirty-seven unmapped properties were included in the EDR report. Unmapped sites are those with insufficient address information such that they can only be identified as within the zip code of the target property. Based on reconnaissance of the site vicinity, the unmapped properties were not within the applicable search radii or are duplicate listings and are discussed in the appropriate subsections of Section 5.

5.7 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO THE SITE

To summarize Subsections 5.1 through 5.6, thirty-five 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 6.

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
Northwest Cast Metal Products	CERCL-NFRAP	Lower	Low	No Violations, down gradient
Mt. Olivet Baptist Church	RCRA-SQG	Equal/Higher	Low	No Violations, Church
Columbia Villa Property	US Brownfields, ECSI, LUST, UST, OR-VCS	Equal/Higher	Moderate	Housing Redevelopment Project; No Further Action, LUST Cleanup

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
				4/10/96, 4 USTs Decommissioned; in excess of ¼ mile from Site
Airgas Nor Pac	ECSI, OR-VCS	Lower	Low	No Cleanup Dates Reported, Topographically Lower and Down Gradient
Mitchell Brothers Truck Lines	ECSI	Lower	Low	No Cleanup Dates Reported, Topographically Lower and Down Gradient
Name of Site Not Reported	ECSI	Lower	Low	Some Remedial Action Completed, No Other Cleanup Dates Reported, Topographically Lower and Down Gradient
Pacific Carbide & Alloys Co.	ECSI, OR CRL	Lower	Low	Some Remedial Action Completed, No Other Cleanup Dates Reported, Topographically Lower and Down Gradient
NW Cast/Universal Silver	ECSI, OR CRL	Lower	Low	Some Remedial Action Completed, No Other Cleanup Dates Reported, Topographically Lower and Down Gradient
Pacific Meat Co.	ECSI, OR CRL	Lower	Low	Remedial Action Being Conducted at Site, Topographically Lower and Down Gradient
Gallus, Inc.	ECSI, LUST	Lower	Low	No Cleanup Dates or Remedial Action Dates Reported, LUST Cleanup Date 5/29/97, Topographically Lower and Down Gradient
General Electric Industrial Co.	ECSI	Lower	Low	No Further Action Status, Topographically

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
				Lower and Down Gradient
Goodyear Distribution Center	ECSI	Lower	Low	No Violations, Topographically Lower and Down Gradient
Name of Site Not Reported	ECSI, OR CRL	Lower	Low	No Cleanup Dates Reported, Topographically Lower and Down Gradient
Name of Site Not Reported	ECSI	Lower	Low	Preliminary Assessment Report Submitted to DEQ on 8/14/04, Topographically Lower and Down Gradient
Blasen & Blasen Lumber Co.	ECSI	Lower	Low	No Cleanup Dates Reported, Topographically Lower and Down Gradient
Ferguson Enterprises, Inc.	ECSI	Lower	Low	No Cleanup Dates Reported, Topographically Lower and Down Gradient
Familian NW	ECSI	Lower	Low	No Cleanup Dates Reported, Topographically Lower and Down Gradient
Malarkey Landfill	SWF/LF	Lower	Low	No Violations, Topographically Lower and Down Gradient
Eric Holen	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
D Fleskes	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
R Martinelli	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
Wecker Construction	LUST	Equal/Higher	Moderate	No Cleanup Date Reported, Heating Oil Tank
Vince Caillovette	LUST	Equal/Higher	Low-	No Cleanup Date

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
			Moderate	Reported, Residential Heating Oil Tank
James Glass	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
D Adam	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
Wayne & Roxanne Henry	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
Sharon Mullins	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
Devin Stross	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
M Luttrell	LUST	Equal/Higher	Low-Moderate	No Cleanup Date Reported, Residential Heating Oil Tank
Don & Leatha Tyra	LUST	Lower	Low	No Cleanup Date Reported, Residential Heating Oil Tank, Topographically Lower and Down Gradient
Florence Shields	LUST	Lower	Low	No Cleanup Date Reported, Residential Heating Oil Tank, Topographically Lower and Down Gradient
Gerda Cox	LUST	Lower	Low	No Cleanup Date Reported, Residential Heating Oil Tank, Topographically Lower and Down Gradient
Redbird Estate	LUST	Lower	Low	No Cleanup Date Reported, Residential Heating Oil Tank, Topographically Lower and Down Gradient
Doug Thayer	LUST	Lower	Low	No Cleanup Date Reported, Residential

TABLE 6				
PROPERTIES EVALUATED FOR POTENTIAL ENVIRONMENTAL RISKS				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
				Heating Oil Tank, Topographically Lower and Down Gradient
Columbia Slough	AOC-COL	Lower	Low	No Violations Reported, Topographically Lower and Down Gradient

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

Based on an evaluation of available site information and details concerning the properties listed in Table 6, 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 September 7, 2006, Site visit and area reconnaissance, a review of available Site records, and information obtained from U.S. Army Reserve personnel.

6.1 ABOVEGROUND STORAGE TANKS

One 360-gallon used oil AST is currently present at the Site, located within the OMS building. The AST is a double-walled tank with a built-in secondary containment. No stains or evidence of spills were observed around the AST. Records indicate the presence of a former 400-gallon AST in a wood shed with a sand bag berm in the northwest corner of the Site. A 1996 Facility Environmental Inspection Memo states that the tank was to be emptied and the wood shed removed. At the time of the September 2006 Site visit the northwest corner of the site was paved with asphalt and no indications of staining could be observed. No documentation was available on the decommissioning and removal of a former 400-gallon AST located in the northwest corner of the Site.

6.2 ASBESTOS CONTAINING MATERIAL

A table provided by the 70th RRC listing the status of ACM surveys for its facilities shows that an asbestos survey has been performed at the Site with a report dated May, 1994. A copy of this survey was not provided for this study, however, a document discussing a proposed addition to the OMS from 1993 states that ACM is present in the OMS building. Considering that the administration building was built at the same time as the OMS, similar materials were most likely used. No additional information was provided.

During the Site visit, floor tiles and pipe wrap, materials that typically contain ACM, were observed in fair condition.

6.3 INDOOR FIRING RANGE

Historically, the Site operated an indoor firing range. In June 1994 a range removal and abatement was performed by Performance Abatement Services. A 1994 report following testing after the removal and abatement concluded that the Site was now free of any accessible lead contamination due to past use as a firing range. The area now acts as a physical training weight room and a classroom.

6.4 INVENTORY OF CHEMICALS / HAZARDOUS SUBSTANCES

At the time of the Site visit, the OMS building contained one 55-gallon drum of grease, and three 55-gallon drums of different weight oils. All of these products are connected to an electric air compressor and distributed through hoses in the maintenance bays.

Two portable hazmat storage sheds are located north of the OMS building. One of the hazmat sheds contained approximately 16 empty 5-gallon fuel cans, a portable generator and a fire proof cabinet with aerosol cans and various less than 5-gallon containers of a variety of routinely used materials. The other hazmat shed contained empty 5- and 55-gallon drums, oxygen and acetylene gas tanks, and numerous discharged fire extinguishers.

Miscellaneous training supplies and routine janitorial supplies were observed in the administration building at the time of the September 2006 site visit.

6.5 LEAD-BASED PAINT (LBP)

According to information provided by the 70th RCC, there are no documented lead-based paint surveys or abatement projects at the Site. Based on the date of construction (1960), it is likely that LBP exists in the structures. During the 2006 site visit, painted surfaces within the administration building and OMS appeared to be in good to fair condition.

6.6 MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

No indications were found during the September 2006 site visit or during the review of records to indicate the presence of MEC at the Site, including unexploded ordnance. A locked small arms vault is located within the administration building. According to site personnel, however, no ammunition for the arms are located or stored at the Site.

6.7 NEARBY PROPERTIES

Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site were evaluated. Overall, none of the sites evaluated exhibit environmental conditions that have a probability to adversely affect environmental conditions at the Site. Nearby properties include residential homes, a park and a church.

6.8 OIL/WATER SEPARATOR

Historically, an OWS was located adjacent to a wash rack just south of the OMS, and collected wash water from the wash rack drain before going into the city sanitary sewer system. According to site records, both the wash rack and adjacent OWS were removed in 1998. Existing Site drainage is collected through a series of catch basins,

pipes and manholes throughout the site and goes to a newer OWS installed around 1993 in the northeast portion of the Site adjacent to Chautauqua Boulevard. This OWS then discharges to the city sanitary sewer.

6.9 PCB EQUIPMENT

Based upon information provided by the 70th RRC, there is no known PCB containing equipment at this facility; however, PCBs 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 treated as if they contain PCBs, and management and disposal of these light ballasts must be in accordance with Local, State and Federal requirements.

6.10 PCB TRANSFORMERS

A concrete pad mounted transformer is situated near the northeast corner of the administration building. The transformer is not labeled and according to personnel interviews, is owned, operated and maintained by Portland General Electric.

6.11 PITS, SUMPS, DRYWELLS, AND CATCH BASINS

A 2004 Survey of Drains, Pollution Control Equipment, and Discharge Points identified ten exterior surface storm drains, five dry wells, and an OWS at the Site. In addition, six interior floor drains are located within the mechanical room and the kitchen area. A grease trap is located in the kitchen under a sink. All of these structures were observed during the 2006 Site visit and appeared to be in functioning condition.

According to the report, the interior drains are tied into the City's sanitary sewer system. The report states that the grease trap also discharges to the sanitary sewer system. In addition, the report states that nine of the exterior drains ultimately go to the OWS and joins the city sanitary sewer. One of the exterior drains discharges to a drywell. All five drywells have gravel bottoms and slotted sides for infiltration. A sump is located in the mechanical room which also discharges to the city sanitary sewer.

6.12 RADIOACTIVE MATERIALS

During the September 2006 Site visit and records review process, no indications were found of the past storage or use of radiological commodities at the USAR Center.

6.13 RADON

Information provided by the 70th RRC shows that a site-specific radon survey was performed in 1991. Based on the sampling results, no locations sampled exhibited radon levels above the U.S. Environmental Protection Agency's recommended

maximum allowable exposure level of 4 picoCuries per liter of air (pCi/L). Radon surveys are currently being performed at facilities within the 70th RRC by Shaw Environmental Group. The radon surveys commenced in July 2006 and results are currently not available. It is not known if this Site is one of the 2006 survey sites.

6.14 UNDERGROUND STORAGE TANKS

According to site personnel no underground petroleum storage tanks are currently present on the Site. Site records, however, show some discrepancy. One document from a 1989 Army Site report shows that three heating oil tanks are present, one 680-gallon, one 5,000-gallon, and one 10,000-gallon. Other records from the DEQ from 2001 indicate that two 675 and a 10,000-gallon diesel USTs were decommissioned and removed from the Site. Diesel contamination was discovered during the decommissioning and approximately 275 tons of contaminated soil was excavated and taken to the appropriate landfill. Tests after cleanup indicated that diesel levels were well below the most stringent cleanup level. Accordingly, a No Further Action letter was written by the DEQ dated December 26, 2001. It appears that the 1989 report may have been incorrect. There is no information regarding the location or former location of any of the tanks.

6.15 WASTE DISPOSAL SITES AND ACTIVITIES

Solid waste is managed on-site in two metal dumpsters, one for cardboard and one for other solid waste. The dumpsters are picked up weekly by Arrow Sanitary Services, Inc. Non-hazardous waste management, such as waste oil, is managed by DRMO. There were no signs of land-filling or illegal waste disposal activities at the Site during the September 2006 site visit.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

Figure 16 in Appendix A provides a 2005 aerial photograph of the USAR Center and surrounding properties and depicts current land use. The Site is zoned residential, as is most of the land surrounding the USAR Center. Two exceptions are the Mt. Olivet Baptist Church southwest of the Site which is zoned commercial neighborhood business and University Park to the west of the Site which is zoned open space.

7.2 COASTAL ZONE MANAGEMENT

According to information reviewed on-line at the Oregon Coastal Management Program's website (http://egov.oregon.gov/LCD/OCMP/CstZone_Intro.shtml), the Site does not lie within a coastal zone management area.

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. During the September 2006 Site visit, no cattails and other vegetation indicative of saturated areas were 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 and 500-year flood plains. Figure 7 in Appendix A provides a map depicting the extent of the nearest 100-year flood plain in relation to the Site.

7.5 NATURAL RESOURCES

No Site specific survey addressing natural resources was available for review. Based on discussions with Mr. Patrick Marchman, Environmental Program Manager with ICI, LLC, there are no issues of environmental concern related to natural resources at the Site. No threatened and endangered species lists were available.

7.6 CULTURAL RESOURCES

Based on discussions with Mr. Marchman and review of the U.S. Army Reserve Integrated Cultural Resources Management Plan, Historic Properties Component (Section 3.5.15), there is neither cultural or traditional religious significance nor historic properties identified at the Site. Furthermore, the Site is not identified in the National Register Information System database.

8.0 CONCLUSIONS

Lawhon & Associates, Inc. in conjunction with FMSM was contracted to prepare an ECP report for the 2LT Alfred Sharff U.S. Army Reserve Center OR009 located at 8801 North Chautauqua Boulevard, Portland, Oregon 97207. The tract of land is triangular shaped and encompasses approximately 5 acres. The Site consists of two permanent buildings: a main administrative building and an outlying OMS building.

The USAR Center is currently occupied by the 671st Engineering Company, the 379th Postal Company, and the 126th Chaplin Detachment. The Site has been a USAR Center since the administration building and OMS were constructed in 1960. The OMS was expanded in 2005. The land and buildings are owned by the U.S. Government.

The Site has primarily functioned as an administrative, logistical, and educational facility, with limited basic vehicle maintenance occurring in the OMS building.

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 property. The following paragraphs present the findings related to areas of potential environmental concern that were evaluated during the ECP process.

- **Aboveground Storage Tanks** - One 360-gallon used oil AST is currently present at the Site, located within the OMS building. The AST is a double-walled tank with a built-in secondary containment. No stains or evidence of spills were observed around the AST. Records indicate the presence of a former 400-gallon AST in a wood shed with a sand bag berm in the northwest corner of the Site. A 1996 Facility Environmental Inspection Memo states that the tank was to be emptied and the wood shed removed. At the time of the September 2006 Site visit the northwest corner of the site was paved with asphalt and no indications of staining could be observed.
- **Asbestos Containing Materials** - A table provided by the 70th RRC listing the status of ACM surveys for its facilities, shows that an asbestos survey has been performed at the Site with a report dated May, 1994. A copy of this survey was not provided for this study, however, a document discussing a proposed addition to the OMS from 1993 states that ACM is present in the OMS building. Considering that the administration building was built at the same time as the OMS, similar materials were most likely used. No additional information was provided.
- **Hazardous Substances** - Chemicals containing CERCLA hazardous substances may 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.

- **Indoor Firing Range** - Historically, the Site operated an indoor firing range. In June 1994 a range removal and abatement was performed by Performance Abatement Services. A 1994 report following testing after the removal and abatement concluded that the Site was now free of any accessible lead contamination due to past use as a firing range. The area now acts as a physical training weight room and a classroom.
- **Lead-Based Paint** - There are no documented LBP surveys or abatement projects at the Site. Based on the date of construction of the administration and OMS buildings (1960), it is likely that LBP exists in the structures. A document discussing a proposed addition to the OMS from 1993 states that LBP is suspected to be present in the OMS building. It also states that most of the areas that are suspected to contain LBP will be encapsulated prior to the OMS expansion project. No additional information is provided.
- **Munitions and Explosives of Concern** - No indications were found during the site visit or records review process of the past presence of MEC, including unexploded ordnance. A locked small arms vault is located within the administration building. According to site personnel no ammunition for the arms are located or stored at the Site.
- **Nearby Properties** - Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site were evaluated. Overall, none of the sites evaluated exhibit environmental conditions that have a significant probability to adversely affect environmental conditions at the Site.
- **Oil/Water Separator** - Historically, an OWS was located adjacent to a wash rack just south of the OMS, and collected wash water from the wash rack drain before going into the city sanitary sewer system. According to site records, both the wash rack and adjacent OWS were removed in 1998. Existing Site drainage is collected through a series of catch basins, pipes and manholes throughout the site and go to a newer OWS installed around 1993 in the northeast portion of the Site adjacent to Chautauqua Boulevard. This OWS then discharges to the city sanitary sewer.
- **PCB Equipment** - Based upon information provided by the 70th RRC, there is no known PCB containing equipment at this facility; however, PCBs 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.

- **PCB Transformers** - A concrete pad mounted transformer is situated near the northeast corner of the administration building. The power box is not labeled and according to personnel interviews, is operated and maintained by Portland General Electric.
- **Petroleum Product Storage** – Two mobile diesel fuel trucks are parked at the Site. Personnel interviews during the 2006 Site visit stated that they do occasionally fuel vehicles from the mobile fuel trucks. A portable, collapsible secondary containment liner with side walls is placed under the vehicles when fueling is performed. Additional petroleum storage may historically have occurred within the OMS building or hazmat sheds. There is no evidence that petroleum products in excess of 55-gallons were stored for one year or more on-site.
- **Pits, Ponds, Sumps, Drywells, and Catch Basins** - A 2004 Survey of Drains, Pollution Control Equipment, and Discharge Points identified ten exterior surface storm drains, five dry wells, and an OWS at the Site. In addition, six interior floor drains are located within the mechanical room and the kitchen area. A grease trap is located in the kitchen under a sink. All of these structures were observed during the 2006 Site visit and appeared to be in functioning condition.

According to the report, the interior drains are tied into the City's sanitary sewer system. The report states that the grease trap also discharges to the sanitary sewer system. In addition, the report states that nine of the exterior drains ultimately go to the OWS and joins the city sanitary sewer. One of the exterior drains discharges to a drywell. All five drywells have gravel bottoms and slotted sides for infiltration. A sump is located in the mechanical room which also discharges to the city sanitary sewer.

- **Radiological Materials** - Facility personnel indicated that to their knowledge the Site never had a Nuclear Regulatory 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 any radiological commodities were ever improperly managed at the Site, or that any radionuclides were ever released.
- **Radon** - Information provided by the 70th RCC shows that a radon survey was performed at the site in 1991. Based on the sampling results, no locations

sampled exhibited radon levels above the USEPA's recommended maximum allowable exposure level of 4 pCi/l. Radon surveys are currently being performed at facilities within the 70th RRC by Shaw Environmental Group. The radon surveys commenced in July 2006 and results are currently not available. It is not known if this Site is one of the 2006 survey sites.

- **Underground Storage Tanks** – According to site personnel no underground petroleum storage tanks are currently present on the Site. Site records show some discrepancy with respect to previous USTs. One document from a 1989 Army Site report shows that three heating oil tanks are present, one 680-gallon, one 5,000-gallon, and one 10,000-gallon. Other records from the Oregon Department of Environmental Quality from 2001 indicate that two 675 and a 10,000-gallon diesel USTs were decommissioned and removed from the Site. Diesel contamination was discovered during the decommissioning and approximately 275 tons of contaminated soil was excavated and taken to the appropriate landfill. Tests after cleanup indicated that diesel levels were well below the most stringent cleanup level. Accordingly, a No Further Action letter was written by the DEQ dated December 26, 2001. It appears that the 1989 report may have been incorrect, or otherwise there may be additional tanks at the Site. There is no information regarding the location or former location of any of the tanks.
- **Wash Water Discharge.** A former vehicle wash rack and an accompanying OWS was situated south of the OMS building. Historically, wastewater collected through the wash rack drains discharged to the OWS situated by the wash rack and ultimately to the city sanitary sewer. According to personnel interviews and review of documented information provided by the 70th RRC, use of the wash rack and OWS was discontinued and later both were removed by an outside contractor in 1998. No other information indicating whether soil samples were collected in the area of the former wash rack was available for inclusion of this ECP Report. Currently, vehicles are washed on a concrete pad outside the south bay door of the new OMS. Wash water discharges to the adjacent storm drains which carry it to the OWS by Chautauqua Boulevard and into the city sanitary sewer.

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 remediation of contaminated soil associated with former heating oil USTs.

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, USAR Center 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

10.1 PERSONS CONTACTED

- Mr. Bob Baernkopf, Supply Technician, Sharff USAR Center, Portland, Oregon, (206) 391-4278, September 7, 2006.
- Ms. Wilson, Staff Administrator, Sharff USAR Center, Portland, Oregon, September 7, 2006.
- Mr. Edward D. Williams, Pastor of Administration, Mt. Olivet Baptist Church, Portland, Oregon, (503) 240-7729, September 7, 2006.
- Mr. Bill J. Schell, Facility Operation Specialist, Sharff USAR Center, Portland, Oregon, (206) 391-4279, September 8, 2006.
- Mr. Patrick Marchman, Environmental Program Manger, ICI, LLC, U.S. Army Reserves 70th Regional Readiness Command, (206) 301-2091, September 11, 2006.
- Mr. Clark Niewendorp, Minerals Resource Geologist, Oregon Department of Geology and Mineral Industries, March, 2007.

10.2 RESOURCES CONSULTED

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- Resource Conservation and Recovery Information System (RCRIS) Corrective Action Sites (CORRACTS), March 15, 2005
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- Superfund Consent Decrees, December 14, 2004
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