

***FINAL***

**ENVIRONMENTAL CONDITION OF  
PROPERTY REPORT**

**MARSHALL  
U.S. ARMY RESERVE CENTER (TX053)  
1209 PINECREST DRIVE EAST  
MARSHALL, TEXAS 75670**

***Prepared For:***

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

**February 28, 2007**

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## CERTIFICATION

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

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**JAMES WHEELER II**  
**Chief, Environmental Division**  
**90<sup>th</sup> Regional Readiness Command**

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**DATE**

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

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**Project Geologist**  
**U.S. Army Corps of Engineers**

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**DATE**

## EXECUTIVE SUMMARY

The Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers, Louisville District, has prepared this Environmental Condition of Property (ECP) Report for the Marshall U.S. Army Reserve (USAR) Center (Facility ID TX053), hereafter referred to as the "Site" or "USAR Center." The Site is located at 1209 Pinecrest Drive East in Marshall, Harrison County, Texas.

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

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

The USAR Center is on 3.78 acres of land with two permanent structures: a 4,472-square-foot Training Building and a 1,328-square-foot organizational maintenance shop (OMS). The site is currently occupied by Detachment 1, 952<sup>nd</sup> Engineering Company. The OMS is no longer operational and OMS operations are in the process of being transferred to the Red River Army Depot.

Based on a review of aerial photographs and U.S. Geological Survey topographical maps dating back to 1947, the Site was an undeveloped lot prior to the U.S. government's purchase in 1958. The two buildings on the Site were constructed in 1959.

Areas of potential environmental concern were reviewed and the TEJV found one significant concern relating to the environmental condition of the Site. On December 1, 2005, approximately 15 gallons of diesel fuel and hydraulic fluid were spilled in the military equipment parking area, on the north side of the driveway connecting the OMS to the vehicle wash rack, when a crane rolled over during loading/unloading activities. In response to the spill, fluids were drained from the overturned crane to stop the leak and stained soil was manually excavated.

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

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### List of Acronyms and Abbreviations

ACM	asbestos-containing material
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
BRRM	Base Redevelopment and Realignment Manual
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CESQG	conditionally exempt small-quantity generator
CFR	Code of Federal Regulations
CONEX	container express
CORRACT	Corrective Action
DoD	Department of Defense
EBS	Environmental Baseline Survey
ECCI	Environmental, Compliance & Construction, Inc.
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
ERNS	Emergency Response Notification System
FEMA	Federal Emergency Management Agency
HVAC	heating, ventilating, and air conditioning
IHW	Industrial and Hazardous Waste
IOP	Innocent Owner/Operator Program
kg	kilogram
LBP	lead-based paint
LPST	Leaking Petroleum Storage Tank
LQG	large-quantity generator
MEP	military equipment parking
NFRAP	No Further Remedial Action Planned
NOV	Notice of Violation
NPL	National Priorities List
NRCS	Natural Resources Conservation Service

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OMS	organizational maintenance shop
OWS	oil-water separator
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
PMT	pole-mounted transformer
POL	petroleum, oil, and lubricants
POV	privately owned vehicle
PST	Petroleum Storage Tank
PWS	Public Water Supply
RCRA	Resource Conservation and Recovery Act
RCRAInfo	RCRA Information
RQ	reportable quantity
RRC	Regional Readiness Command
RSC	Regional Support Command
SQG	small-quantity generator
SWEPCO	Southwestern Electric Power Company
TBA	Targeted Brownfields Assessment
TCEQ	Texas Commission on Environmental Quality
TEJV	Terraine-EnSafe Joint Venture
TSD	treatment, storage, and disposal
TSI	thermal system insulation
USACE	U.S. Army Corps of Engineers
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USAR	U.S. Army Reserve
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
VCP	Voluntary Cleanup Program
VWR	vehicle wash rack
WWTP	Waste Water Treatment Plant

## **1.0 INTRODUCTION**

The Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers (USACE) Louisville District, was authorized to prepare an Environmental Condition of Property (ECP) Report for the Marshall U.S. Army Reserve (USAR) Center (Facility ID TX053), in response to the Base Realignment and Closure Act (BRAC) 2005 legislation. The work was performed under Contract No. W912QR-04-D-0044, Delivery Order No. 0008. The facility located at 1209 Pinecrest Drive East in Marshall, Harrison County, Texas, is hereafter referred to as the "Site" or "USAR Center." In support of the ECP, a visual reconnaissance of the Site was conducted on July 24, 2006. The purpose of the reconnaissance was to visually obtain information indicating the likelihood of recognized environmental conditions in connection with the Site.

### **1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY**

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

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

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

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

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

## **1.2 SCOPE OF SERVICES**

This ECP Report covers the 3.78-acre USAR Center at 1209 Pinecrest Drive East, in Marshall, Texas. The property is bounded by Marshall High School across Turtle Creek to the north, Progressive Chiropractic and undeveloped property to the west, Austin Bank and Marshall Mall across Pinecrest Drive East to the south, and a Marshall School District administrative office building to the east. A general Site location map, Site map, historical topographic maps and aerial photographs, and a Federal Emergency Management Agency (FEMA) flood plain map are provided in Appendix A. Appendix B provides photographs taken during the July 2006 Site reconnaissance. Appendix C provides chain-of-title information. Historical environmental documents and reports are provided in Appendix D. The environmental database report is provided in Appendix E.

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

- Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
- Category 2: Areas where only release or disposal of petroleum products has occurred.
- Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.

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

### **1.3 ASSUMPTIONS AND LIMITATIONS**

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

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

This ECP Report presents a summary of readily available information on the environmental conditions of, and concerns relative to, the land, facilities, and real property assets at the USAR Center. Its findings are based on a record search of readily available documents, a thorough review of the applicable and relevant documents, a visual reconnaissance conducted on July 24, 2006, and interviews with personnel knowledgeable about the Site and its history. Extensive environmental investigations and reports and Site historical documents were reviewed in support of this ECP. Information obtained from these other studies is reflected within this report by reference. A complete list of references is provided as Section 9.0.

All Site buildings were visually inspected during the Site reconnaissance. However, a 100% visual reconnaissance of each building (e.g., attics, crawl spaces, etc.), was not practical due to accessibility restrictions. TEJV personnel were not allowed to enter the arms storage room due to security restrictions. No sampling or analysis of any media was conducted during this survey.

## 2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

The Site reconnaissance included a driving tour of the facility and the surrounding area, and a walking assessment of the Site and buildings including the Training Building and the organizational maintenance shop (OMS). The visual reconnaissance was conducted by TEJV personnel on July 24, 2006, to field-verify information produced in the document review and to identify recognized environmental conditions of property. All roads on the Site accessible by two-wheel drive vehicle were driven or walked during the reconnaissance.

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

### 2.1 SITE LOCATION

The Site is at 1209 Pinecrest Drive East in Marshall, Harrison County, Texas. As shown on Figure 1 in Appendix A, the Site is in a commercially developed area in the south central portion of Marshall. It is bordered by Marshall High School to the north, Marshall School District to the east, and commercial properties to the west and south. Residential subdivisions are further north, west, and south.

### 2.2 ASSET INFORMATION

Facility Name and Address:	Marshall USAR Center (TX053) 1209 Pinecrest Drive East Marshall, Texas 75670
Property Owner:	U.S. Government
Date of Ownership:	August 12, 1958
Current Occupant:	Detachment 1, 952 <sup>nd</sup> Engineering Company
Zoning:	General Business (C-3)
County, State:	Harrison County, Texas
USGS Quadrangle:	Marshall East, Texas
Latitude/Longitude:	32° 31' 40.1"N; 94° 21' 15.8"W

Legal Description: All those certain pieces or parcels of land being part of "Lot 236, OL SE, BLD" Subdivision, with a Geo ID of 03010.05125.00000.000000, situated and lying in the City of Marshall, Harrison County, State of Texas. Assessor's Parcel No: R000039358.

A copy of the chain-of-title report, which includes a complete legal description, is provided in Appendix C.

### **2.3 PHYSICAL DESCRIPTION**

A Site map of the USAR Center is provided as Figure 2 in Appendix A. Photographs 1 through 8 show the Site perimeter. Photographs 9 through 16 show adjacent properties. Photographs 17 through 40 show Site improvements, the interior and exterior of the buildings, specific environmental conditions, or other Site-specific items.

The USAR Center is on 3.78 acres of land with two permanent buildings: a 4,472-square-foot Training Building and a 1,328-square-foot OMS, which is currently inactive. The Training Building and OMS walls are concrete block with brick veneer. Other improvements on the Site include a vehicle wash rack (VWR) and associated oil-water separator (OWS); and paved privately owned vehicle (POV) parking and military equipment parking (MEP) areas. Also located on the Site are two portable steel sheds used for petroleum, oil and lubricants (POL) and hazardous materials storage, and three steel mobile shipping container express (CONEX) boxes used to store field equipment.

The perimeter of the OMS and MEP area is secured by a chain-link fence along Mustang Drive, with two vehicle access gates located on the west side, and a pedestrian and vehicle access gate that both open into the POV parking lot located on the south side. Approximately one-third of the Site is considered impervious (asphalt parking areas, driveways, concrete walkways, building footprints, etc.), while the remainder is covered by lawn except for the northern portion of the MEP area that is gravel covered. The Site is bordered to the south by Pinecrest Drive East and to the west by Mustang Drive. A concrete-lined drainage feature known as Turtle Creek is along the northern border of the property.

Topographically, the Site is relatively flat with a gentle slope to the north. No signs of erosion, excavation, or fill were observed on the Site.

The Training Building includes classrooms, a kitchen/break room, restrooms, offices, an arms storage room, supply rooms, and mechanical room. The interior of the building appeared to be well maintained during the Site reconnaissance. A classroom, mechanical room, kitchen/break room, and restrooms occupy the northern part of the Training Building. A classroom, offices, and an arms room occupy the southern portion of the Training Building. No concerns were identified in the interior. The arms storage room, reportedly used to store infantry small arms and ammunition, was not accessed by

TEJV personnel due to security reasons. No evidence of chemical or petroleum releases was observed inside any room in the Training Building. West of the Training Building is a covered concrete pad used as an outdoor break area.

The OMS is a one-story, rectangular structure within chain-link security fencing, located north of the Training Building. The interior of the OMS is one room separated into sections by chain-link fencing and storage shelves. During the Site reconnaissance, the OMS was inactive and OMS operations were in the process of being transferred to the Red River Army Depot. A self-contained parts washer was located along the west wall of the OMS. Two flammable materials storage cabinets in the OMS contain paints and primers in aerosol containers (16 ounces and less).

A VWR and associated OWS are west of the OMS. When the OMS was active, POLs and hazardous materials were stored in two portable metal containers within the fenced area, east of the VWR. The metal containers currently store new and used POLs and hazardous materials that have yet to be transferred to the Red River Army Depot. According to the records review, the USAR removed a VWR and associated OWS in 1999. The removed VWR and OWS were located near the OMS.

Three CONEX boxes and the MEP area are also within the OMS security fence. Five bulldozers and one earth mover were in the MEP area during the Site reconnaissance. South of the MEP area and outside the OMS security fence is a solid waste Dumpster. No significant oil staining or any other staining was observed in the MEP area.

## **2.4 SITE HYDROLOGY AND GEOLOGY**

### **2.4.1 Surface Water Characteristics**

Appendix A provides a topographic map (Figure 1) of the Site and surrounding area. As shown on the map, the Site gently slopes to the north and is approximately 328 feet above mean sea level. The Site drains north toward Turtle Creek, a concrete-lined drainage feature, and east toward a drainage ditch that flows north to Turtle Creek. Turtle Creek is the only surface water body present on the Site or adjacent areas. The nearest surface water bodies are two small unnamed ponds, one located approximately three-quarters of a mile to the east and the other approximately three-quarters of a mile to the southwest. A review of the FEMA Flood Insurance Rate Map, Panel Number 4803190005C, indicated that the northernmost portion of the Site along Turtle Creek may lie within the 100-year flood plain.

Based on the Harrison County soils map from the U.S. Department of Agriculture Natural Resource Conservation Service (NRCS), the predominant surface soil type on the Site is the Bernaldo soil component. Bernaldo soils are composed of silts and clays and are moderately well-drained soils with moderate infiltration rates. Bernaldo soils are not listed as hydric by the NRCS.

## 2.4.2 Hydrogeological Characteristics

No wells or springs were observed on the Site. The Site and surrounding area are served with public water by the City of Marshall. A database search was conducted for federal U.S. Geological Survey (USGS) wells, federal Public Water Supply (PWS) System wells, and state-registered wells within one mile of the Site (see the Environmental Data Resources, Inc. [EDR] Report in Appendix E). Two unused PWS System wells were identified on databases for sites within one mile.

The Site is located in the North East Texas Regional Water Planning Area, within the Cypress Creek Basin. The two major aquifers in this area are the Carrizo-Wilcox and Trinity aquifers. Also, four minor aquifers exist in the region: the Blossom, Nacatoch, Queen City, and Woodbine aquifers. Groundwater is limited in quality and quantity in large portions of the North East Texas Region and, consequently, most of the region relies on surface water supply. For example, in the Sulphur Basin, 91% of the water used is surface water; 89% of water used in the Cypress Creek Basin is surface water and, in the Sabine River Basin, 81% of the need is met by surface water. In the portion of the Red River Basin in the region, 88% of the water supply used is surface water.

The Wilcox Group consists of sand units, silts, clays and lignites. Water transmissive units in the Wilcox Group are discontinuous both vertically and laterally; therefore, the water-bearing zones in the Wilcox cannot be classified as a single, homogeneous water-bearing zone. Groundwater, confined in some areas, and unconfined in others, flows south to southeast.

The City of Marshall is within the West Gulf Coastal Plain Physiographic region. Information provided in environmental databases indicated that the lithology underlying the Site consists of the Tertiary-Aged Eocene Claiborne Group.

The City of Marshall owns two registered water wells within one mile of the Site. Water well number 3530703 is located one-half to one mile north-northeast of the Site. The well is at a higher elevation than the Site and has a reported depth of 375 feet. The well was installed in 1937 and is currently unused. Water well number 3530704 is located approximately three-quarters of a mile to the north and at a higher elevation than the Site. The well has a depth of 473 feet, was installed in November 1941, and is currently unused.

Seventeen environmental soil borings are registered for Tie Investors, LLC, located approximately one-quarter mile to the northeast. The borings were completed to a depth of 5 to 15 feet in 2003. Geology was reported as red sand fill underlain by sandy clay, silty clay, clayey sand, and clay.

Based upon surface topography, shallow groundwater flow is expected to be generally north-northeast, toward Turtle Creek.

## **2.5 SITE UTILITIES**

The Site is served by public utilities. Southwestern Electric Power Company (SWEPCO) provides electricity to the Site. Entex Gas Utility Company provides natural gas to the Site. The City of Marshall provides water and sewer services for the Site. Olympic Waste Services, Inc. provides solid waste and wastewater disposal services.

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

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

### 3.0 SITE HISTORY

#### 3.1 HISTORY OF OWNERSHIP

Land titles for the Site were reviewed back to 1915. Appendix C contains a historical chain-of-title report completed for the Site. Key historical deed transfers of the Site within the last 60 years are as follows:

- October 14, 1946 — Lawrence P. and Kaye Miller to James P. and Bernadine C. Thorn
- June 6, 1950 — Bernadine Thorn (widow) to Roger and Mary Magers
- August 12, 1958 — Roger and Mary Magers to the United States of America

The chain-of-title report did not identify any environmental liens, institutional controls or engineering controls of record for the USAR Center property.

#### 3.2 PAST USES AND OPERATIONS

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

Year	Summary of Historic Events at Marshall USAR Center
1958	Site acquired by the U.S. Government
1959	Marshall USAR Center constructed
1999	Previous OWS and VWR removed and replaced by current system
2006	Facility Closure Plan prepared

Historical information sources suggest that the Site was undeveloped prior to the construction of the USAR Center in 1959.

Historic uses of the USAR Center included administrative and educational operations, and maintenance and washing of military vehicles. The Site was historically used by reservists for drill activities on varying weekends throughout the year. OMS operations are being transferred to the Red River Army Depot and several military vehicles, related maintenance equipment, POLs, and hazardous materials remain on the Site.

Historical topographic maps and aerial photographs provide information about the Site and surrounding area. Figures 3 and 4 in Appendix A present topographic maps of the Site and surrounding area dated 1962 and 1978, respectively. Figures 5 through 10 present aerial photographs of the Site and surrounding areas dated 1947, 1963, 1984, 1990, 1995, and 2004, respectively.

Pertinent observations on the historical USGS topographic maps are summarized below.

- **1962 and 1978 (Figures 3 and 4).** These topographic maps show the Site developed. Surrounding properties to the east, north, and south appear undeveloped.

Pertinent observations on the historical aerial photographs are summarized below.

- **1947 (Figure 5).** This aerial photograph shows the Site undeveloped and the surrounding area properties as residentially developed or undeveloped.
- **1963 (Figure 6).** This aerial photograph shows the Site and adjacent property to the west developed and the other adjacent properties as undeveloped.
- **1984 through 2004 (Figures 7 through 10).** These aerial photographs show the Site and surrounding properties to be developed with their existing structures. The Austin Bank, adjacent to the south, and an outparcel of the Marshall Mall do not appear in the 1984 aerial photograph, but are in the 2004 photograph.

EDR provided a review of the 1924 *Page's City Directory* for the Site and surrounding area. Pinecrest Drive East was not listed in the 1924 city directory. In addition, the TEJV reviewed Polk, Johnson, and Mullin-Kille & Demmer city directories dated 1955 through 2005 at roughly five-year intervals at the Marshall Public Library. The Site address was listed as the USAR Center in the 1959 and subsequent city directories.

The TEJV reviewed historical Texas Digital Sanborn fire insurance maps dated 1885, 1889, 1894, 1899, 1904, 1909, 1915, 1931, and 1947 available online through the Texas State Library and Archives Commission. There was no coverage for the Site.

According to a Harrison County Historical Museum Research Library librarian, the Site and surrounding areas were historically used as rice fields due to the flooding of Turtle Creek located on the north side the Site. Turtle Creek was paved with concrete to alleviate flooding. The librarian also stated that the area surrounding the Site was not commercially developed until the 1970s, when the Mall of Marshall and Marshall High School were constructed.

The earliest available information about the Site is 1947, which shows the Site as an undeveloped field. Based on the above information, historical land use at the Site property was undeveloped prior to development in 1959 as the USAR Center.

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

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

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

According to USAR personnel, the OMS is in the final stages of being transferred to nearby Red River Army Depot. Vehicle maintenance and washing activities have ceased; however, some OMS operations equipment and POLs remaining on the Site are in the process of being transferred to Red River Army Depot. Hazardous substances and POLs stored and used in vehicle maintenance activities included motor oil, lubricants, paints, antifreeze, adhesives, sealants, and degreasers. Except for 16-ounce or smaller aerosol paint cans in two flammable materials storage cabinets and a parts washer with fluid in the OMS maintenance bay, hazardous materials and wastes were stored in two portable buildings located near the OWS. Janitorial chemicals and building maintenance-related products were stored in the designated storage area within the janitorial closet in the Training Building.

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 USAR personnel. According to USAR personnel and Site records, the disposal of hazardous materials or hazardous wastes has not occurred on the Site.

According to USAR personnel, offsite disposal of hazardous waste was contracted through various qualified disposal companies that were awarded contracts through a bid system. A Spill Notification Form obtained at the Site indicated that a spill of approximately 15 gallons of diesel fuel and hydraulic fluid occurred in the MEP area on December 1, 2005. The spill occurred when a crane rolled over during loading/unloading activities. The spill occurred on the north side of the driveway connecting the OMS to the VWR. In response to the spill, fluids were drained from the overturned crane to stop the leak and stained soil was manually excavated. USAR personnel stated that the spill did not leave the Site property boundary. No other releases of hazardous substances or petroleum products were identified.

No stained soil or stressed vegetation was observed on the Site during the Site reconnaissance. The MEP area and POV parking area did not show any signs of significant staining, and no noxious or foul odors were noted.

## **3.4 PAST BULK PETROLEUM STORAGE TANKS**

Based upon a review of available Site records, a search of federal and state environmental databases, and interviews with USAR personnel, it does not appear that bulk petroleum aboveground storage tanks (ASTs) or underground storage tanks (USTs) have been on the Site. The Site previously contained a subsurface OWS that was

registered as a UST in 1997. That OWS was removed in 2000, and was replaced with the current aboveground OWS which includes a 250-gallon AST containing wastewater from the OWS.

### **3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS**

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

#### **3.5.1 Environmental Baseline Survey Report**

Engineering, Compliance & Construction, Inc. (ECCI) prepared an *Environmental Baseline Survey* (EBS) in November 2004 for the USAR, 90<sup>th</sup> Regional Readiness Command (RRC). At the time of the EBS, the OMS was operational. "In accordance with the ASTM Standard D 5746-98 for *Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities*," ECCI classified the Site as an ECP Area Type 1 Property. An ECP Area Type 1 Property is an area or parcel of real property where no release or disposal of hazardous substances or petroleum products or their derivatives has occurred (including no migration of these substances from adjacent properties).

#### **3.5.2 Asbestos Inspection Report**

An asbestos inspection of the Site was performed on July 20, 1999 (U.S. Army 90<sup>th</sup> Regional Support Command [RSC], 1999). During the inspection, samples of suspect asbestos-containing material (ACM) were collected from the Training Building, including 12-inch vinyl floor tile and mastic, replacement floor tile and mastic, drywall, duct sealant, vibration collars, mudded joints, corrugated pipe wrap, ceiling tile, and pipe sealant. Findings were as follows:

- Asbestos was detected in both the corrugated pipe insulation and mudded elbows of the domestic cold water lines in the Training Building. The friable thermal system insulation (TSI) was classified in damaged condition with a low potential for disturbance.
- Pipe sealant on the hot water supply lines (nonfriable) and duct sealant on the heating, ventilating, and air conditioning (HVAC) duct (nonfriable) in the Training Building was found to contain asbestos. Both were classified in good condition with a low probability for disturbance.
- Presumed ACM vibration collars (flexible duct connectors) were found in the men's locker room in the Training Building and in the OMS. Both sets of collars were considered friable, in damaged condition, and have a high probability of disturbance.

The scope of the 1999 inspection was confined to rooms and areas accessible on the days of the survey. Some rooms and areas were reportedly not made available for inspection, or were inaccessible for reasons of security or unavailability of keys, and were not included in the inspection. In addition, the report stated inaccessible suspect materials could also be located between walls, in voids, or in other concealed areas. Therefore, additional ACM could exist in inaccessible areas on the Site.

### **3.5.3 Radon Report**

A Site-specific radon study was performed on the USAR Center with results recorded in an August 29, 1994, memo (U.S. Army 90<sup>th</sup> RSC). Testing was performed at one location at the Site. The activity level for the sample collected in the main building was 3.0 picocuries per liter (pCi/L). The USEPA-recommended action level for radon is 4.0 pCi/L.

### **3.5.4 Lead-Based Paint Report**

A LBP survey was performed on the Site and a report issued in July 2003 (U.S. Army 90<sup>th</sup> RSC). LBP was detected on a metal outside door at the OMS. No immediate actions were recommended. The report advised following proper working and environmental protection procedures if lead-positive areas were to be disturbed. Also, the report concluded that, if untested paint was "uncovered", additional testing would be necessary.

### **3.5.5 Polychlorinated Biphenyls Report**

A polychlorinated biphenyl (PCB) assessment report for the Site was prepared by the U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) in 1997. The report states that three pole-mounted transformers (PMTs) marked #12602, #12603, and #12604 were located on the west side of the Training Building. The assessment stated that the PMTs were manufactured by Central Malone in 1958, they had not been tested for PCB content, and the transformers' condition was "fair: some rust." Also, the report stated none of the fluorescent lighting fixtures observed in the facility was operated by PCB-containing ballasts.

### **3.5.6 Cultural Resources Report**

Parsons Engineering Science, Inc. prepared two reports - *Archaeological Assessment and Reconnaissance of 90<sup>th</sup> Regional Support Command Facilities in Texas* and *Management Summary, Cultural Resources Assessment of 90<sup>th</sup> Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas* in February 1998. The assessments concluded the Site has a "low" archaeological potential due to the distance from permanent water sources and the results of nearby surveys. No archaeological survey was recommended, and the Texas State Historic Preservation Officer concurred with the report's recommendation. The assessments also concluded that, based on a construction date of 1946, the USAR Center is potentially eligible for the

National Register of Historic Places and, since neither of the buildings has been significantly altered, it was recommended that they be further surveyed and evaluated to determine whether they are eligible for listing on the National Register of Historic Places. Other sources mentioned in this ECP have indicated the actual date of building construction to be 1959, not 1946.

### **3.5.7 Oil-Water Separator Evaluation Report**

EnSafe Inc. prepared an *Oil-Water Separator Evaluation* for the 90<sup>th</sup> RRC in May 2000. At the time of the report, two OWSs were located on the Site. Recommendations in the report are as follows.

- Follow through with plans to abandon/remove OWS at the southeast of the VWR.
- Install curbing and wash rack canopy to prevent storm water infiltration to the OWS.
- Establish a schedule for routine sludge, oil, and sediment removal based on usage and material accumulation.
- Inspect OWS system annually.
- Develop site-specific written program which describes procedures and management practices used to ensure compliance with the Clean Water Act.

### **3.5.8 Architectural Assessment Report**

Parsons Engineering Science, Inc. performed a *Historical Architectural Resources Assessment of 90<sup>th</sup> Regional Support Command Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas* in February 1998. The report lists the construction of the Training Building and the OMS as dating to 1946 and further states that, since neither of the buildings have been significantly altered, it is recommended that they be further surveyed and evaluated to determine whether they are eligible for listing on the National Register of Historic Places. Other sources mentioned in this ECP have indicated the actual date of building construction to be 1959, not 1946.

#### 4.0 ADJACENT PROPERTIES

Figure 10 in Appendix A provides a 2004 aerial view of the Site and adjoining properties. The Site is bordered on the south and west by commercial properties, on the east by Marshall School District, and on the north by Marshall High School. Table 2 provides a list of adjacent properties with their directional location from the Site. The zoning of the adjacent parcels is also listed in Table 2.

<b>Table 2 List of Adjacent Properties</b>			
<b>Direction from Site</b>	<b>Name/Type of Property</b>	<b>Address</b>	<b>Zoning</b>
North	Marshall High School, then commercial	1900 Maverick Drive	General Business District, C-3
South	Marshall Mall	1300 Pinecrest Drive East	General Business District, C-3
East	Marshall School District, then residential	1305 Pinecrest Drive East	General Business District, C-3
West	Progressive Chiropractor, then residential	1203 Pinecrest Drive East	General Business District, C-3

A circular area of stressed vegetation, approximately 10 feet in diameter, was observed on the adjacent property to the north, near the northeast corner of the Site. The cause of the stressed vegetation could not be determined, but did not appear to be related to the USAR Center. No recognized environmental conditions or other potential environmental conditions associated with adjoining properties were identified during the Site reconnaissance. No environmental database-listed facilities were identified on the adjoining properties during the records review.

Appendix A provides historical aerial photographs and topographic maps and Appendix E presents an environmental database report that was used to evaluate potential environmental impacts from adjacent and surrounding properties that may have also impacted the environmental conditions at the Site. Land use at the adjacent properties does not appear to have changed significantly over the years and does not appear to have impacted the environmental conditions of the USAR Center.

## **5.0 REVIEW OF REGULATORY INFORMATION**

A component of the ECP is the review of all reasonably obtainable federal, state, and local government records for the Site and surrounding properties where there has been a release or likely release of any hazardous substance or any petroleum product and that are likely to cause or contribute to a release or threatened release of any hazardous substance or any petroleum product on the federal real property. An environmental database summary was obtained from EDR on July 18, 2006. The environmental database summary consolidates standard federal, state, local, and tribal environmental record sources based on ASTM D 6008-recommended minimum search distances from the Site. A copy of the complete EDR report is included in Appendix E.

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

A review of reasonably accessible USAR environmental documents, Harrison County and Marshall, Texas, records, and aerial photographs of the property were reviewed to investigate land uses at the Site. The Harrison County Historical Museum Research Library, Harrison County Tax Assessor, and the Marshall Public Library were contacted to learn about historic uses of buildings and lands on the Site. Available information on past land uses and their potential impacts was assessed.

The TEJV conducted multiple interviews with relevant personnel to discuss general environmental interest and specific areas of interest identified during the records review and visual reconnaissance. Section 9.0 of this report identifies the individuals interviewed with respect to conditions and operations at the Site and the information from those interviews incorporated into this report.

The interviews included topics of general environmental interest and specific areas of interest identified during the records review and visual Site reconnaissance. Pertinent information from these interviews is incorporated into this report.

### **5.1 FEDERAL ENVIRONMENTAL RECORDS**

#### **5.1.1 Federal National Priorities List Sites within One Mile**

The National Priorities List (NPL) record is a USEPA list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the U.S. and its territories. NPL sites are targeted for long-term remedial action under CERCLA. According to the environmental database report, the USAR Center is not an NPL site, and no NPL sites were identified within one mile of the Site.

### **5.1.2 Federal CERCLIS Sites within One-Half Mile**

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

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

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

### **5.1.3 Resource Conservation and Recovery Act Corrective Action Sites within One Mile**

Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACT) sites represent facilities that have generated or managed hazardous wastes and require corrective action. The Site is not a CORRACT site, and no RCRA CORRACT sites were located within one mile of the Site.

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

The RCRA Information (RCRAInfo) database includes selective information on facilities that generate, transport, and treat, store, and/or dispose (TSD) of hazardous waste as defined by RCRA. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. No RCRA transporters or TSD facilities were identified on the RCRAInfo database within one-half mile of the Site.

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

Conditionally exempt small-quantity generators (CESQG) generate less than 100 kg of hazardous waste, or less than one kg of acutely hazardous waste per month. RCRA small-quantity generators (SQGs) are defined as facilities generating between 100 kg and 1,000 kg of hazardous waste per month, while a large-quantity generator

(LQGs) is defined as a facility generating more than 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month.

The USAR Center is a CESQG of wastes generated during former vehicle maintenance activities. No violations were reported for the Site. According to the environmental database report, no federal RCRA SQGs or LQGs were located within one-quarter mile of the Site.

#### **5.1.6 Federal Emergency Response Notification System List**

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

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

The regulatory information presented below was obtained from the environmental database search report. Supplemental information was provided from database searches of the Texas Commission on Environmental Quality (TCEQ) Central Registry Query available at <http://www4.tceq.state.tx.us/crpub/>.

#### **5.2.1 State-Permitted Landfills or Solid Waste Disposal Sites within One-Half Mile**

Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. There were no permitted solid waste disposal facilities/landfills within one-half mile of the Site. There is no solid waste landfill, incinerator, or transfer station on the Site.

#### **5.2.2 State-Registered Leaking Petroleum Storage Tank Sites within One-Half Mile**

According to the environmental database report and the state of Texas' Leaking Petroleum Storage Tank (LPST) Database Query Web site, one LPST site was identified within one-half mile of the USAR Center. The City of Marshall Wastewater Treatment Plant (WWTP) at 5 Notch Road is approximately 2,625 feet north and at a higher elevation than the Site. A petroleum leak was discovered on January 28, 1993, following which a 550-gallon UST was removed. Soil contamination was determined to be "minor" by TCEQ. The LPST site has received closure from TCEQ, indicating that no further remedial action is required and that residual petroleum contamination does not pose a concern for human health or the environment.

The Site is not listed in the Texas LPST database.

### **5.2.3 State-Registered UST Sites within One-Quarter Mile**

USTs are regulated under RCRA Subtitle I and must be registered with the state department responsible for administering the UST program. According to the TCEQ Petroleum Storage Tank (PST) database, the USAR Center was identified as a UST site because of the former underground OWS. No documented releases were identified for the OWS. No closure report or sampling was available for review; however, contract information for the removal of the OWS contained photographs that showed it to be within an open subsurface concrete containment structure.

No other UST sites were identified within one-quarter mile of the USAR Center.

### **5.2.4 State Spills Incidents**

No spills incidents for the Site were listed on the TCEQ Spills Database.

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

No contaminated PWS System wells were identified during this investigation. In addition, no wells were identified on the Site or adjoining property during the Site reconnaissance. As discussed in Section 2.4.2, two unused City of Marshall wells were identified within one mile of the Site.

### **5.2.6 Voluntary Cleanup Program Sites within One-Half Mile**

The Texas Voluntary Cleanup Program (VCP) was established to provide administrative, technical, and legal incentives to encourage the cleanup of contaminated sites in Texas. The TCEQ and the Texas Railroad Commission maintains databases. The Texas Railroad Commission's VCP database includes sites for which incentives have been offered by the state for remediating oil- and gas-related pollutants by participants, as long as they did not cause or contribute to the contamination. Applicants to the program receive a release of liability to the state in exchange for a successful cleanup. According to the environmental database report, there are no VCP sites located within one-half mile of the Site.

### **5.2.7 State Brownfields Program Sites within One-Half Mile**

Included in the listing are brownfields properties addressed by Cooperative Agreement Recipients and brownfields properties targeted by Targeted Brownfields Assessments (TBA). The TBA program is designed to assist states, tribes, and municipalities in minimizing the uncertainties of contamination often associated with brownfields. Under the TBA program, USEPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. TBAs supplement and work with other efforts under USEPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields.

No State Brownfields sites were listed within one-half mile of the Site.

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

Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health. No state-registered sites with Engineering Controls were listed within one-half mile of the Site.

#### **5.2.9 State-Registered Sites with Institutional Controls within One-Half Mile**

Institutional controls include administrative procedures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls. No state-registered sites with Institutional Controls are listed within one-half mile of the Site.

#### **5.2.10 State-Registered Dry-Cleaning Facilities within One-Quarter Mile**

There are no dry-cleaning facilities within one-quarter mile of the site.

#### **5.2.11 Industrial and Hazardous Waste Database**

The TCEQ maintains an Industrial and Hazardous Waste (IHW) Database, which is developed from summary reports reported by waste handlers, generators, and shippers in Texas. According to the environmental database report, the USAR Center is not listed on the IHW Database.

#### **5.2.12 Commercial Hazardous and Solid Waste Management Facilities Listing**

The TCEQ maintains a Commercial Hazardous and Solid Waste Management Facilities Listing that includes commercial recycling facilities and facilities permitted or authorized (interim status) by the TCEQ. According to the environmental database report, the USAR Center is not listed on the Commercial Hazardous and Solid Waste Management Facilities Listing.

#### **5.2.13 Innocent Owner/Operator Program**

The TCEQ maintains the Innocent Owner/Operator Program (IOP) Database, which contains information on all sites that are in IOP. An IOP is an innocent owner or operator whose property is contaminated as a result of a release or migration of contaminants from a source or sources not located on the property, and they did not cause or contribute to the source or sources of contamination. According to the environmental database report, the USAR Center is not in the IOP Database.

#### **5.2.14 State Superfund Sites within One Mile**

The TCEQ maintains a State Superfund Registry database which includes listed and de-listed state Superfund sites. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using status funds are identified along with sites where cleanup will be paid for by potentially responsible parties. According to the environmental database report, there are no listed or de-listed state Superfund sites located within one mile of the Site.

#### **5.2.15 Current Emission Inventory Database**

The TCEQ maintains the Current Emission Inventory Database that lists, by company, actual emissions and TCEQ air accounts that emit USEPA criteria pollutants. According to the environmental database report, the USAR Center is not in the Current Emission Inventory Database.

#### **5.2.16 Notice of Violations Listing**

The TCEQ maintains a notice of violation (NOV) Listing for permit violations. According to the environmental database report, the USAR Center is not in the NOV Listing.

#### **5.2.17 Edwards Aquifer Permits**

The TCEQ maintains a listing of permits in the Edwards Aquifer Protection Program database. The Site is not within the Edwards Aquifer zone, and is not listed in the database.

#### **5.2.18 Environmental Liens Listing**

The state maintains an Environmental Liens Listing, which includes TCEQ liens placed against either State Superfund sites or Federal Superfund sites to recover costs incurred by TCEQ. According to the environmental database report, the USAR Center is not in the Environmental Liens Listing.

#### **5.2.19 Manufactured Gas Plant Sites within One Mile**

EDR maintains a proprietary Manufactured Gas Plants database. The database includes records of coal gas plants (manufactured gas plants) compiled by EDR. Manufactured gas sites were used in the United States from the 1800s to 1950s to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludge, oils, and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination. According to EDR, there are no manufactured gas plants located within one mile of the Site.

### 5.2.20 Historical Auto Stations and Dry Cleaners

EDR maintains proprietary databases of historical auto stations and dry cleaners, which were compiled from selected national collections of business directories. Historic gas stations include gas, gas station, filling station, auto, automobile repair, auto service station, and service station businesses; whereas historical dry cleaners include dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash and dry businesses. According to the environmental database report, the USAR Center site is not in the either of these databases.

### 5.3 TRIBAL ENVIRONMENTAL RECORDS

According to the environmental database report, no designated Indian Reservations or tribal environmental records are listed for the Site.

### 5.4 UNMAPPED SITES

Six unmapped sites were listed in the environmental database report. Unmapped sites are those with address information sufficient only to identify as within the zip code of the target Site. Further research was conducted using maps of the Site and surrounding area. None of the unmapped sites were found to be within the corresponding ASTM-defined minimum search distance for the databases on which the sites were listed.

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

Table 3 summarizes the two properties evaluated as potential risks to the Site. One of the two sites is the USAR Center. The Marshall WWTP is considered to represent a low risk to the Site, due to its distance from the Site and closure from TCEQ.

Table 3 Summary of Properties Evaluated				
Company/Site	Database	Elevation in Regards to Site	Potential Risk to Site?	Comment
Marshall USAR Center (Site)	PST	Equal	Low	Listed as a UST site for a former OWS. OWS was below surface grade within a concrete containment structure.
Marshall WWTP	LPST	Higher	Low	Listed a former 550-gallon UST. The tank was removed from the ground and closure was issued by TCEQ.

Based on an evaluation of available information and details concerning the identified sites, no "High Risk" sites were identified in the area of the Site. "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

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

Findings documented in the following subsections are based on the July 24, 2006, Site and area reconnaissance, review of available Site records, and information obtained from USAR personnel.

### **6.1 USTs AND ASTs**

During the Site reconnaissance, no signs of bulk petroleum USTs or ASTs were observed on the Site or adjoining properties. An inactive OWS is above surface grade, and located within a concrete secondary containment. One 250-gallon AST, containing wastewater from the OWS, is also located within the containment. A grit chamber plumbed between the VWR and the OWS is located in a concrete sump. The OWS and containment structure were in good condition, free of stains or liquids, and did not appear to have impacted the Site. The gravity operated OWS is plumbed to the VWR and discharges to the sanitary sewer system.

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

USAR personnel provided a current inventory of chemicals/hazardous substances stored on the Site. The inventory includes various glues, POLs, cleaners, and paints, and is included in Appendix D. There is no indication that CERCLA hazardous substances were stored at the Site for one year or more, disposed, or released in excess of corresponding RQs.

### **6.3 WASTE DISPOSAL SITES**

No signs of landfilling or illegal waste disposal activities were observed on the Site during the Site reconnaissance.

### **6.4 PITS, SUMPS, DRY WELLS, AND CATCH BASINS**

The OWS grit chamber located below surface grade (discussed in Section 6.1) is the only pit, sump, dry well, or catch basin observed on the Site.

### **6.5 ASBESTOS-CONTAINING MATERIAL**

As discussed in Section 3.5.2, an asbestos inspection was performed on the Training Building in 1999 (U.S. Army 90<sup>th</sup> RSC). TSI containing asbestos was identified in corrugated pipe insulation and mudded elbows of the domestic cold water lines in the Training Building. Additionally, pipe sealant on the hot water supply lines and duct sealant on the HVAC duct in the Training Building was found to contain asbestos. Presumed ACM (vibration collars) were found in the men's locker room in the Training Building and in the OMS. During the Site reconnaissance, building materials and their condition appeared similar to those noted in the 1999 asbestos inspection report.

## **6.6 PCB-CONTAINING EQUIPMENT**

A PCB assessment conducted in 1997 (USACHPPM) identified three PMTs manufactured by Central Malone in 1958 which had not been tested for PCB content. The transformers' condition was listed as "fair: some rust." At the time of the Site reconnaissance, three PMTs on the west side of the Training Building were observed to be in fair condition with surface rust and no signs of visible leaks. The transformers are owned and maintained by SWEPCO, the local electricity provider, who was contacted by the TEJV regarding its transformer management practices. SWEPCO personnel stated all transformers manufactured prior to 1979 are assumed to contain PCBs, while transformers manufactured after 1979 are assumed to be free of PCBs. Transformers are tested for PCBs by SWEPCO when they are taken out of service. Also, SWEPCO personnel confirmed the transformers at the Site are owned and maintained by SWEPCO and they were installed prior to 1979. Based on information from SWEPCO, the three PMTs located on the west side of the Training Building are assumed to contain PCBs since they were manufactured in 1958.

## **6.7 LEAD-BASED PAINT**

The buildings at the Site were constructed in 1959 and are presumed to have been painted with LBP. A LBP survey of the Site performed in 2003 (U.S. Army 90<sup>th</sup> RSC) indicated a metal exterior door to the OMS was the only area found to contain LBP. No immediate actions were recommended. The report advised following proper worker and environmental protection procedures in lead-positive areas that would be disturbed. The report also recommended additional testing if untested paint is "uncovered." During the Site reconnaissance, painted surfaces were observed to be in good condition.

## **6.8 RADON**

A review of the USEPA Map of Radon Zones for Texas classified the City of Marshall, Harrison County, Texas to be in Zone 3, which is classified as "low potential" for radon, or less than 2 pCi/L. According to Federal Area Radon information summarized in the EDR report, 22 sites have been tested for radon in Harrison County. The results averaged 0.5 pCi/L, with a maximum of 1.2 pCi/L. Radon information was obtained from the National Radon Database, which was developed by the USEPA and is a compilation of the USEPA/State Residential Radon Survey and the National Residential Radon Survey conducted from 1986 to 1992.

A Site-specific radon study was performed on the USAR Center with results published in an August 29, 1994, memo (U.S. Army 90<sup>th</sup> RSC). Testing was performed at one location in the Training Building and the test result was 3.0 pCi/L. The USEPA-recommended action level for radon is 4.0 pCi/L.

## **6.9 UNEXPLODED ORDNANCE**

No indications were found during the Site reconnaissance or during the review of records to indicate the presence of munitions and explosives of concern at the Site.

## **6.10 RADIOLOGICAL MATERIALS**

During the Site reconnaissance and records review process, no indications were found of the past storage or use of radiological materials at the USAR Center.

## **7.0 REVIEW OF SPECIAL RESOURCES**

### **7.1 LAND USE**

The Site is located within the city limits of Marshall, Texas. A City of Marshall Planning and Community Development employee stated the property is zoned General Business District (C-3). The surrounding properties are also classified as C-3 with no industrial zoning located within one-half mile of the Site. Currently there are no plans to change the zoning of the property.

### **7.2 COASTAL ZONE MANAGEMENT**

The Texas Coastal Management Plan is administered by the Texas General Land Office. The Texas coastal zone extends southwest along the coast from the Sabine River to the Rio Grande River, seaward into the Gulf of Mexico for a distance of 10.35 miles, and inland to include 36 counties. The coastal zone includes all counties bordering the Gulf of Mexico and extends approximately 40 miles inland. It includes all estuaries and tidally influenced streams and bounding wetlands. The USAR Center is approximately 200 miles inland from the Gulf of Mexico. Harrison County is not included in the Texas Coastal Management Plan.

### **7.3 WETLANDS**

A search for wetland information was conducted online from the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map data Web site, with no digital data available for the Site. Additionally, EDR did not have wetlands information for the Site. No vegetation typical of wetlands was observed on the Site.

### **7.4 100-YEAR FLOODPLAIN**

A review of FEMA Flood Insurance Rate Map, Panel Number 4803190005C, indicated that the northernmost portion of the Site along Turtle Creek may lie within the 100-year flood plain (Figure 11).

### **7.5 NATURAL RESOURCES**

A search of the USFWS Threatened and Endangered Species List indicated that the Bald Eagle and the Louisiana Black Bear are listed as threatened or endangered in the Marshall, Harrison County, Texas area. No records were found to indicate that any of these species, or any other species listed as endangered or threatened, have been identified on the Site or adjacent properties. Except for potential incidental use by migrants, the threatened and endangered species are unlikely to occur at the Site. No Site-specific natural resource reports were available for review.

## **7.6 CULTURAL RESOURCES**

Parsons Engineering Science, Inc. performed a *Historical Architectural Resources Assessment of 90<sup>th</sup> Regional Support Command Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas* in February 1998. The report lists the construction of the Training Building and the OMS as dating to 1946 and further states that, since neither of the buildings have been significantly altered, it is recommended that they be further surveyed and evaluated to determine whether they are eligible for listing on the National Register of Historic Places. A review of the historical aerial photograph dated 1947 shows the property to be undeveloped. Furthermore, according to chain-of-title information, the Site was not acquired by the U.S. Government until 1958. Therefore, the Site buildings appear to have been constructed in 1959 and not in 1946, as reported in the historical architectural resources assessment.

Parsons Engineering Science, Inc. also performed an *Archaeological Assessment and Reconnaissance of 90<sup>th</sup> Regional Support Command Facilities in Texas* in February 1998. The report lists the Site as having a “low” archaeological potential due to the distance from permanent water sources and the results of nearby surveys. No archaeological survey was recommended, and the Texas State Historic Preservation Officer concurred with the report’s recommendation.

## **7.7 OTHER SPECIAL RESOURCES**

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

## 8.0 CONCLUSIONS

The TEJV, under contract to the USACE, Louisville District, has prepared this ECP Report for the Marshall USAR Center (Facility ID TX053), located at 1209 Pinecrest Drive East in Marshall, Harrison County, Texas. The USAR Center is on 3.78 acres of land with two permanent structures: a 4,472-square-foot Training Building and a 1,328-square-foot OMS. The site is currently occupied by Detachment 1, 952<sup>nd</sup> Engineering Company. The OMS is no longer operational and OMS operations are in the process of being transferred to the Red River Army Depot.

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

- **Hazardous Substances.** Chemicals containing CERCLA hazardous substances would have historically 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 1,000 kg or the RQ of designated hazardous substances, or one kg of acutely hazardous waste. Two flammable materials storage cabinets located in the OMS contain hazardous materials such as carburetor cleaner, paints, and thinner in containers one gallon or less in size. Two portable metal sheds that contain new and used POLs and one-gallon containers of vehicle shop products. There is no evidence that the chemicals used or stored were released or disposed of at the Site.
- **USTs/AST.** No bulk petroleum USTs have historically been located on the Site or are currently located on the Site. An OWS located within a subsurface concrete secondary containment was registered as a UST with the TCEQ. That OWS was removed and replaced with the current OWS in 2000. The existing inactive OWS is above surface grade, is located within a concrete secondary containment, and discharges to the sanitary sewer. One 250-gallon AST, containing wastewater from the OWS, is also located within the containment. A grit chamber plumbed between the VWR and the OWS is located in a concrete sump. During the Site reconnaissance, the OWS and containment structure were in good condition, free of stains or liquids, and did not appear to have an impact on the Site.
- **Non-UST/AST Petroleum Storage.** Petroleum storage has occurred in designated areas within the OMS and in two portable POL storage sheds in the OMS area. POL and hazardous materials were identified in these areas during the Site reconnaissance from former operation within the OMS. No releases or staining were observed and the materials were properly stored. No documentation was available for review that would indicate that non-UST/AST petroleum products in

excess of 55 gallons were stored for one year or more on the Site, or that petroleum products were spilled or disposed of in the OMS area.

A Spill Notification Form obtained on the Site indicated that a spill of approximately 15 gallons of diesel fuel and hydraulic fluid occurred in the MEP area on December 1, 2005. The spill occurred when a crane rolled over during loading/unloading activities. The spill occurred on the north side of the driveway connecting the OMS to the VWR. In response to the spill, fluids were drained from the overturned crane to stop the leak and stained soil was manually excavated. USAR personnel stated that the spill did not leave the Site property boundary. No other releases of hazardous substances were identified.

- **Wash Water Discharge.** An inactive, but intact, covered VWR is located in the southwest corner of the fenced OMS/MEP area. The OWS associated with the VWR discharges to the city sanitary sewer system.
- **Polychlorinated Biphenyls.** A PCB assessment was performed in 1997 (USACHPPM) to address three PMTs located on the west side of the Site and fluorescent lights in the Training Building. The assessment report stated PMTs were manufactured by Central Malone in 1958, none of the transformers had been tested for PCBs and the transformers' condition was listed as "fair: some rust." Also, the PCB assessment report stated none of the fluorescent lighting fixtures observed in the facility was operated by PCB-containing ballasts. During the July 2006 Site reconnaissance, three PMTs on the west side of the Training Building appeared in fair condition with surface rust and no visible leaks. SWEPCO, the local electricity company and owner of the three PMTs, was contacted and their personnel stated all SWEPCO transformers manufactured prior to 1979 are assumed to contain PCBs, while transformers manufactured after 1979 are assumed to be free of PCBs. Based on information from SWEPCO, the three PMTs on the Site are assumed to contain PCBs since they were manufactured in 1958.
- **Asbestos-Containing Material.** An asbestos inspection of the Site performed on July 20, 1999 (U.S. Army 90<sup>th</sup> RSC) found asbestos in the Training Building in both the corrugated pipe insulation and mudded elbows of the domestic cold water lines. Also, pipe sealant on the hot water supply lines and duct sealant for the HVAC ductwork in the Training Building contained asbestos. Presumed ACM (vibration collars) were found in the men's locker room in the Training Building and in the OMS. During the July 2006 Site reconnaissance, building materials and condition appeared similar to those noted in the 1999 asbestos inspection report.
- **Lead-Based Paint.** A LBP survey performed at the Site in 2003 (U.S. Army 90<sup>th</sup> RSC) indicated LBP was found on an exterior pedestrian door to the OMS. No immediate actions were recommended. During the July 2006 Site reconnaissance, painted surfaces were observed to be in good condition.

- **Radiological Materials.** No radiological materials were identified during the Site reconnaissance. There is no evidence of a release of radiological materials at the Site.
- **Radon.** A Site-specific study performed on the USAR Center (U.S. Army 90<sup>th</sup> RSC, 1994) tested one area in the Training Building. The radon activity level for the Training Building was 3.0 pCi/L. The USEPA-recommended action level is 4.0 pCi/L.
- **Munitions and Explosives.** No evidence was found during the Site reconnaissance or records review process of the past presence of munitions and explosives of concern.
- **Surrounding Properties.** Potential environmental sites of concern, located within corresponding ASTM D 6008–defined minimum search distances from the Site, were evaluated. Land use at the adjacent properties does not appear to have changed significantly over the years and does not appear to have impacted the environmental conditions of the USAR Center.

Areas of potential environmental concern were reviewed and the TEJV found one significant concern relating to the environmental condition of the Site. On December 1, 2005, approximately 15 gallons of diesel fuel and hydraulic fluid were spilled in the MEP area, on the north side of the driveway connecting the OMS to the VWR, when a crane rolled over during loading/unloading activities. In response to the spill, fluids were drained from the overturned crane to stop the leak and stained soil was manually excavated.

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

## 9.0 REFERENCES

### PERSONS CONTACTED

- Ruth Briggs, Harrison County Research Library, Librarian and Marshall life long resident, (903) 938-2680, July 24, 2006.
- Sergeant First Class Garrett Spooner, Marshall USAR Center, Detachment 1, 952<sup>th</sup> Engineering (EN) Company (CO), (901) 938-2252, July 25, 2006.
- Winston Robinson, Planning and Community Development Director, Department of Planning and Development, Marshall, Texas, (903) 935-4459, August 29, 2006.
- Becky McJenkins, Environmental Engineer, Southwestern Electric Power Company, (888) 216-3523.

### RESOURCES CONSULTED

- ECCL. *Environmental Baseline Survey of Marshall USAR Center*. February 2006.
- EnSafe Inc. *Oil-Water Separator Evaluation*. May 5, 2000.
- Environmental Data Resources Inc. 440 Wheelers Farms Road, Milford, Connecticut 06461.
- FEMA Flood Hazard Insurance Map,  
<http://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView>
- Goodman, S.W. *Memorandum: Clarification of "Uncontaminated" Environmental Condition of Property at Base Realignment and Closure (BRAC) Installations*. October 21, 1996.
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- Parsons Engineering Science, Inc. *Historic Architectural Resources Assessment of the 90<sup>th</sup> Regional Support Command Facilities in Texas*. February 1998.
- Parsons Engineering Science, Inc. *Management Summary Cultural Resources Assessment of 90<sup>th</sup> Regional Support Command Facilities in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas*. February 1998.

- TCEQ PST Registration Database Query Results obtained at the Web site [www.tceq.state.tx.us](http://www.tceq.state.tx.us).
- TCEQ LPST Database Query Results obtained at the Web site [www.tceq.state.tx.us](http://www.tceq.state.tx.us).
- Texas State Library and Archives Commission, Sanborn Maps, 1885, 1889, 1894, 1899, 1904, 1909, 1915, 1931, and 1947.  
<http://www.texshare.edu/marshallpubliclibrary/index.php3>
- U.S. Army 90<sup>th</sup> Regional Support Command (RSC). *Asbestos Building Survey, Marshall U.S. Army Reserve Center, Marshall, Texas.* July 1999.
- U.S. Army 90<sup>th</sup> RSC. *Lead Based Paint Inspection, Marshall USAR Center, Marshall, Texas.* July 2003.
- U.S. Army 90<sup>th</sup> RSC. *Memorandum, Results of Radon Testing, Marshall U.S. Army Reserve Center, Marshall, Texas.* August 1994.
- U.S. Army Center for Health Promotion and Preventive Medicine. *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97 (for 90<sup>th</sup> Regional Support Command).* September 30, 1997.
- U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *Chemical Inventory.* July 26, 2006.
- U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *Pest Management Plan.* April, 2005.
- U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *Facility Closure Plan.* April 1, 2006.
- U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *Final Submittals Presented in Connection with Replace Floor Tile and Windows, American Asbestos, Inc.* December 1997.
- U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *Repair Vehicle Wash Facility Scope of Work.* September 9, 1999.
- U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *Spill Notification Form.* December 1, 2005.
- U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *UST Registration Form.* January 7, 1997.

- U.S. Department of Agriculture, National Resources Conservation Service, *Web Soil Survey*. <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.
- U.S. Environmental Protection Agency Map of Radon Zones, <http://www.epa.gov/radon/zonemap.html>
- U.S. Fish and Wildlife Service, Endangered Species List, Southwest Region Ecological Services, Harrison County, Texas. <http://www.fws.gov/ifw2es/endangeredspecies/lists/ListSpecies.cfm>
- U.S. Fish and Wildlife Service, National Wetlands Inventory. <http://www.fws.gov/nwi/>.

**AGENCIES CONTACTED**

- City of Marshall Department of Planning and Community Development
- City of Marshall Historical Society
- City of Marshall Public Library
- Harrison County Tax Assessor
- Harrison County Soil and Water Conservation District

**Appendix A**  
**Figures**

**FIGURES**

Figure 1	General Site Location Map
Figure 2	Site Layout Plan
Figure 3	1962 Topographic Map
Figure 4	1978 Topographic Map
Figure 5	1947 Aerial Photograph
Figure 6	1963 Aerial Photograph
Figure 7	1984 Aerial Photograph
Figure 8	1990 Aerial Photograph
Figure 9	1995 Aerial Photograph
Figure 10	2004 Aerial Photograph
Figure 11	FEMA Flood Plain Map

**Appendix B**  
**Site Reconnaissance Photographs**

**Appendix C**  
**Chain-of-Title Report**

**Appendix D**  
**Previous Environmental Reports**

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**PREVIOUS ENVIRONMENTAL REPORTS**

1. ECCL. *Environmental Baseline Survey* of Marshall USAR Center. February 2006.
2. EnSafe Inc. *Oil-Water Separator Evaluation*. May 5, 2000.
3. Parsons Engineering Science, Inc. *Archaeological Assessment and Reconnaissance of the 90<sup>th</sup> Regional Support Command Facilities in Texas*. February 1998.
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15. U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *Spill Notification Form*. December 1, 2005.

16. U.S. Army Reserve Center, Detachment 1, 952<sup>nd</sup> Engineering Company, Marshall, Texas. *UST Registration Form*. January 7, 1997.

**Appendix E**  
**Regulatory Database Search Reports**