

FINAL

**ENVIRONMENTAL CONDITION OF
PROPERTY REPORT**

**BOSWELL STREET
U.S. ARMY RESERVE CENTER (TX062)
423 BOSWELL STREET
SAN ANTONIO, TEXAS 78214**

Prepared For:

**U.S. Army Corps of Engineers — Louisville District
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600 Dr. Martin Luther King, Jr. Place
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February 14, 2007

CERTIFICATION

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

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

DATE

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



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Project Geologist
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February 14, 2007

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 Boswell Street U.S. Army Reserve (USAR) Center (Facility ID TX062), hereafter referred to as the "Site" or "USAR Center." The Site is located at 423 Boswell Street in San Antonio, Bexar 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 approximately 8 acres of land with two permanent structures: a 25,303-square-foot Training Building and a 14,623-square-foot organizational maintenance shop. The site is currently occupied by three units: the 694th Maintenance Battalion, the 238th Maintenance Company, and the 340th Quartermaster Company.

Based on a review of aerial photographs and U.S. Geological Survey topographical maps dating back to 1904, the Site was an undeveloped lot prior to 1962. The two buildings on the Site were constructed in 1962 and the USAR has been the only occupant of the Site buildings.

Areas of potential environmental concern were reviewed and the TEJV found no significant concerns relating to the environmental condition of the Site. One surrounding property was considered a "High Risk" to the Site based on Texas Commission on Environmental Quality information. 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
BN	Battalion
BRAC	Base Realignment and Closure
BRRM	Base Redevelopment and Realignment Manual
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CFR	Code of Federal Regulations
CO	Company
CORRACTS	Corrective Action Sites
DoD	Department of Defense
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
IHW	Industrial and Hazardous Waste
IOP	Innocent Owner/Operator Program
kg	kilogram
LBP	lead-based paint
LEL	lower explosive limit
LPST	leaking petroleum storage tank
LQG	large-quantity generator
MEP	military equipment parking
NBC	Nuclear, Biological, and Chemical
NFRAP	No Further Remedial Action Planned
NOV	Notice of Violation
NPL	National Priorities List

OMS	organizational maintenance shop
OWS	oil-water separator
Parsons	Parsons Engineering Science, Inc.
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
PMT	pole-mounted transformer
POL	petroleum, oil, and lubricants
PST	petroleum storage tank
QM	Quartermaster
RCRA	Resource Conservation and Recovery Act
RCRAInfo	RCRA Information
RQ	reportable quantity
RRC	Regional Readiness Command
SQG	small-quantity generator
TBA	Targeted Brownfields Assessments
TCEQ	Texas Commission on Environmental Quality
TEJV	Terraine-EnSafe Joint Venture
TSD	treatment, storage, and disposal
USACE	U.S. Army Corps of Engineers
USACHPPM	U.S. Army Center for Health Promotion and Preventive Medicine
USAR	U.S. Army Reserve
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
UST	underground storage tank
VCP	Voluntary Cleanup Program
VWR	vehicle wash rack

1.0 INTRODUCTION

The Terraine-EnSafe Joint Venture (TEJV), under contract to the U.S. Army Corps of Engineers (USACE) Louisville District, was authorized to prepare an Environmental Condition of Property (ECP) Report for the Boswell Street U.S. Army Reserve (USAR) Center (Facility ID TX062), 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 423 Boswell Street in San Antonio, Bexar 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 August 14 through 16, 2006. The purpose of the reconnaissance was to visually obtain information indicating the likelihood of recognized environmental conditions in connection with the Site.

1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY

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

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

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

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

1.2 SCOPE OF SERVICES

This ECP covers the approximately 8-acre USAR Center at 432 Boswell Street in San Antonio, Texas. The property is bounded by a church and residences to the north, City Public Services to the west, and retail and commercial operations to the south and east. A general Site location map, a Site map, building floor plans, 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 August 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 subject property. Opinions on the environmental conditions at the Site are based on information from the Site reconnaissance, interviews, and collection and review of readily available information. New information or changes in property use could require a review and possible modification of the findings and conclusions contained in this report.

The information obtained from the USAR, the USAR's representatives, individuals interviewed and prior environmental reports was considered to be accurate unless reasonable inquiries indicated otherwise. Conditions observed were considered representative of similar 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 relevant and applicable documents, and a Site reconnaissance conducted August 14 through 16, 2006. 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 and grounds 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. Additionally, the container boxes in the parking area and a storage room in the Training Building were not accessible. No sampling or analysis of any media was conducted during this survey.

2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

A visual Site reconnaissance included a driving tour of the facility and its perimeter, as well as a systematic survey by vehicle and on foot through each section of the property. The visual reconnaissance was conducted by TEJV personnel on August 14 through 16, 2006, to field-verify information produced in the document review and to identify recognized environmental conditions of property.

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 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 USAR Center address is 423 Boswell Street in San Antonio, Bexar County, Texas. As shown on Figure 1 in Appendix A, the Site is approximately 4.5 miles south of downtown San Antonio in an area of commercial and residential use. The Site is bordered by a church and residential property to the north, City Public Services to the west, and retail and commercial operations to the south and east.

2.2 ASSET INFORMATION

Facility Name and Address:	Boswell Street USAR Center 423 Boswell Street San Antonio, Texas
Property Owner:	United States Government
Date of Ownership:	August 26, 1993
Current Occupant:	694th Maintenance Battalion (BN), the 238th Maintenance Company (CO), and the 340th Quartermaster (QM) CO
Zoning:	C-1; Commercial
County, State:	Bexar County, Texas
USGS Quadrangle:	Southton

Latitude/Longitude: 29° 21' 28.8"/98° 29' 50.6"

Legal Description: Being that parcel or tract of land, being P-100 out of New City Block 8250, Jerome Frank Subdivision as recorded in Book 4900, Page 188, also known as Geographic ID 08205-000-1000, situated and lying in the city of San Antonio, Bexar County, State of Texas.

2.3 PHYSICAL DESCRIPTION

A Site layout of the USAR Center is provided as Figure 2 in Appendix A, and the layout of each of the buildings is provided in Figures 3 through 5 in Appendix A. Photographs are provided in Appendix B. Photographs 1 through 3 depict the USAR Center and photographs 4 through 8 depict the conditions at adjoining properties observed during the August 2006 Site reconnaissance. Photographs 9 through 36 illustrate specific environmental conditions or other Site-specific features.

The USAR Center is on approximately 8 acres of land with two permanent structures: a 25,303-square-foot Training Building and a 14,623-square-foot organizational maintenance shop (OMS). The Training Building is used for administrative activities and training. The OMS provides light maintenance support for vehicles, including tire/wheel maintenance, fluid changes, and minor mechanical repairs. Major vehicle overhauls take place at nearby Fort Sam Houston. A vehicle wash rack (VWR) and an oil-water separator (OWS) are east of the OMS. Two slotted trench drains located in the floor of the OMS work bay area currently receive incidental rain water which is routed to the OWS.

A military equipment parking (MEP) area, used to stage vehicles and equipment, surrounds and is south of the OMS. During the Site reconnaissance, approximately 100 vehicles were parked in the MEP area. The northeast portion of the Site was being used to stage container boxes recently returned from Iraq. According to Site personnel, the containers store equipment and supplies, but not petroleum, oil and lubricants (POL) or hazardous materials. The container boxes were sealed so the contents were not inspected, but no spills or releases were observed around the containers.

A vault in the northeast portion of the Training Building is a secure area containing various small arms. According to USAR personnel, limited amounts (less than 100 rounds) of ammunition and small (less than 6 ounces) containers of weapon cleaning fluid are stored in the vault. A weapon cleaning area also associated with the small arms vault consists of a wooden counter. No containers of hazardous materials or staining were observed in the area of the small arms vault. The USAR Center did not have an indoor firing range.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Figure 1 in Appendix A provides a topographic map of the Site and surrounding area. As shown on the map, the Site is relatively flat and is approximately 615 feet above mean sea level. Storm water drainage from the parking areas sheet flows generally west to the unnamed perimeter ditches that discharge to the San Antonio River via Harlandale Creek, which is located south of the Site.

According to the FEMA Flood Insurance Rate Map for Bexar County, Texas (Figure 25 in Appendix A) and Incorporated Areas (Map Number 48029C0626 E, February 16, 1996), the Site is in "Zone X." Zone X is defined by FEMA as "other flood areas." The Site is outside the 100-year flood zone. The average annual precipitation in the area is approximately 29 inches.

2.4.2 Hydrogeological Characteristics

The rock stratigraphic unit of this area is of the Mesozoic Era, Cretaceous System, and Navarro Group in the Stratified Sequence. The Edwards Aquifer, which underlies Bexar County, is composed of Lower Cretaceous age carbonate rock, and has a freshwater zone extending through Bell, Williamson, Travis, Hays, Comal, Bexar, Medina, Uvalde, and Kinney counties.

Based on information from the U.S. Department of Agriculture (USDA) National Cooperative Soil Survey, the predominant soil component is the Houston black gravelly clay which has a 1 to 3% slope. Also located at this Site is the Branyon, which also has a clay texture and a 0 to 1% slope. These soils are both considered moderately well drained. The soils are clayey with a high water table. According to the USDA Natural Resource Conservation Service Web site, hydric soils in this area exist only in surface depressions. No depressions in the land surface were observed at the Site indicating hydric soils are not present.

Based on information provided by the USDA Soil Conservation Service, the predominant soil type at the Site is Branyon. The Branyon soil has a clayey texture with very slow (Class D) infiltration rates. The soil has a high water table. The soil is moderately well drained with a layer of low hydraulic conductivity. Depth to the water table is three to six feet.

No wells or springs were observed on the Site, nor were any wells identified on the Site during the search of the U.S. Geological Survey (USGS), Federal Reporting Data System — Public Water Supply System, and state databases. The Site and surrounding area are served with public water by City Public Services.

2.5 SITE UTILITIES

The San Antonio Water System provides potable water to the Site. Electric power, natural gas, and sanitary sewer services are provided by City Public Service, San Antonio's municipally owned natural gas and electric company.

2.6 WATER SUPPLY WELLS AND SEPTIC SYSTEMS

The Site is served by public utility systems; therefore, there are no wells or septic systems on the Site.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Land titles for the Site were reviewed back to 1918. 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:

- November 20, 1951 — Larry E. Lambert to A.C. Barley
- September 5, 1960 — A.C. Barley to Scott P. Morgan
- October 6, 1971 — Scott P. Morgan to Byron Routh
- September 14, 1979 — Byron Routh to Moudhafer I. Shathir
- January 26, 1984 — Moudhafer I. Shathir to Byron Routh, Inc.
- November 23, 1988 — Byron Routh, Inc. to John B. Routh
- August 26, 1993 — John B. Routh to United States of America

Sanborn maps, provided by Environmental Data Resources, Inc. (EDR), dated 1965 and 1967 depict the Site as it is today.

3.2 PAST USES AND OPERATIONS

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

Table 1 Historical Summary of Boswell Street USAR Center	
Year	Description
1962	Boswell Street USAR Center constructed on land owned by Scott P. Morgan
Pre-1982	OWS installed
1982	Third chamber added to existing OWS
1993	Property purchased by the U.S. government from John B. Routh
1995	OWS and oil-water recycling system installed west of OWS
2003	VWR canopy installed

Historical information suggests that the Site was undeveloped until the U.S. government constructed the Training Building and OWS in 1962. The property is currently occupied by the 694th Maintenance BN, the 238th Maintenance CO, and the 340th QM CO. The mission of the 694th Maintenance BN is command and control. The 238th Maintenance CO performs maintenance support at the unit Level. The 340th QM CO is a maintenance company that provides laundry and bath support.

Historical topographic maps and aerial photographs provide information about the Site and surrounding area. Figures 6 through 12 in Appendix A present topographical maps of the Site and surrounding area dated 1904, 1918, 1943, 1953, 1967, 1973, and 1992,

respectively. Figures 13 through 19 present aerial photographs of the Site and surrounding areas dated 1938, 1959, 1964, 1977, 1986, 1992, and 2004, respectively.

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

- **1904 (Figure 6).** This figure was produced at a scale of 1 inch = 5,200 feet and does not show sufficient detail to make any site-specific observations. The area appears undeveloped and Boswell Street does not exist in this figure.
- **1918 (Figure 7).** This figure was produced at a scale of 1 inch = 10,400 feet and does not show sufficient detail to make any site-specific observations. The area appears undeveloped and Boswell Street does not exist in this figure.
- **1943 (Figure 8).** This figure was produced at a scale of 1 inch = 5,200 feet and does not show sufficient detail to make any site-specific observations. The area appears undeveloped and Boswell Street does not exist in this figure.
- **1953 (Figure 9).** This figure was produced at a scale of 1 inch = 5,200 feet and does not show sufficient detail to make any site-specific observations. Although Boswell Street appears on this figure, the Site appears undeveloped.
- **1967 (Figure 10).** The USAR Center first appears on this figure, and the adjacent property to the south appears developed as well. However, the City Public Services building to the west and the church to the north are not present.
- **1967 – 1973 (Figure 11).** The USAR Center is visible on this figure, as well as structures to the north, south, and west of the Site.
- **1992 (Figure 12).** The USAR Center is visible on this figure, with structures visible to the north, south, east, and west of the Site.

Pertinent observations on the historical aerial photographs are summarized below.

- **1938 (Figure 13).** This figure shows the Site and adjacent properties as undeveloped and most likely in agricultural use. Residential properties are visible to the north and west.
- **1959 (Figure 14).** This figure shows the Site as undeveloped, with nearly all surrounding properties as developed. To the north and east of the Site are residential properties, and to the south and west are commercial properties.
- **1964 (Figure 15).** This figure shows the Site developed with the Training Building and OMS. The surrounding properties all appear to be developed.

- **1977, 1986, and 1992 (Figure 16 through 18).** These figures indicate the Site similar to conditions observed in Figure 15 with vehicles and equipment parked in various areas of the property.
- **2004 (Figure 19).** This figure depicts the addition of the canopy over the VWR, which was installed in 1995, and conditions similar to what was observed during the Site reconnaissance.

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

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

3.3.1 Past Use and Storage of Hazardous Substances

Chemicals formerly used and stored at OMS were associated with vehicle and facility maintenance activities and janitorial services. Janitorial chemicals in consumer-sized containers and building maintenance-related products were stored in the designated storage areas within the janitorial closets in both the Training Building and the OMS.

A 1998 Historical Architectural Report, included in Appendix D, contained a map dated June 2, 1989. The map shows:

- 1 — Drum Storage Area south of the OMS
- 2 — VWR with OWS west of the OMS (same as current location)
- 3 — Transformer northeast of the Training Building (same as current location)
- 4 — Transformer southeast of the Training Building (same as current location)
- 5 — Transformer southwest of the OMS (same as current location)

The VWR location noted in the 1989 figure is the same as that observed during the Site reconnaissance; however, according to Site personnel, the rack was reconfigured and a storage building and overhead cover was constructed in 2003. The Historical Architectural Report contained no information pertaining to the specific types of chemicals or hazardous materials stored in the Drum Storage area or the polychlorinated biphenyl (PCB) content of the transformers at the time of the 1998 survey.

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 the corresponding RQs.

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, disposal of hazardous materials or hazardous wastes has not occurred on the Site. No evidence to the contrary was observed during the Site reconnaissance.

During the Site reconnaissance, a drum storage area was observed south of the OMS in approximately the same location discussed in the 1998 Historical Architectural Report (see Section 3.3.1). All of the containers were unlabeled and empty at the time of the Site reconnaissance. Stains were observed on the concrete pad, indicating a possible release of residual materials from the empty drums. However, the amount of staining is considered *de minimis*.

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 used on the Site. The OWS has been registered as a UST with the Texas Commission on Environmental Quality (TCEQ), as detailed in Sections 3.5.2, 5.2.3, and 6.1.

3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

3.5.1 Environmental Baseline Survey Report

Environmental, Compliance & Construction, Inc. (ECCI), issued an *Environmental Baseline Survey for the Boswell Street USAR Center* in August 2005. The Environmental Baseline Survey provides summary and general information about the Site. "In accordance with the ASTM Designation 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 Oil-Water Separator Assessment

EnSafe Inc. performed an *Oil-Water Separator Evaluation* in May 2000. The assessment indicated that the OWS at the Site was originally a combination of two pre-cast concrete vessels with capacities of 100 and 300 gallons. The installation date of those two vessels was unknown. A third 1,100-gallon capacity chamber was added in 1982. Wash water from the VWR flows to the 100-gallon sediment trap, then to the 300-gallon

collection sump. The collection sump also receives water from the OMS collection drain. At the time of 2000 assessment, the water from the collection sump was pumped to an aboveground recycling system installed in 1995. Once the second chamber reached capacity, water flowed to the third chamber, where excess oil and grease were skimmed off to a separate terminal tank with two concrete baffles prior to discharging to the publicly owned treatment works. Used oil was collected by an outside vendor for recycling. No information was available about the configuration or operation of the OWS prior to 1982.

3.5.3 Architectural Assessment Report

Parsons Engineering Science, Inc. (Parsons), performed a *Historic Architectural Resources Assessment of the 90th Regional Support Command Facilities in Texas* for the Department of the Army. The findings of the assessment were compiled in a report issued February 1998. The report concluded that the buildings on the Site were not eligible for placement on the National Register of Historic Places because they did not meet the 50-year age criteria and they did not appear to possess exceptional historical importance, with Texas State Historic Preservation Office concurrence. An architectural survey was recommended for this Site when it reached 50 years of age, which will be in 2012.

3.5.4 Lead-Based Paint Report

The 90th Regional Readiness Command (RRC) conducted a LBP survey of the USAR Center on November 27, 2001. LBP was found on the interior black stair rail, exterior brown metal door and frames, an exterior brown stair rail, and the exterior overhead door frame. In the maintenance area, LBP was found on the brown overhead door frame, yellow safety paint and bumper guard, brown doorframes, the roof drain, and the beige metal support beam. The 2001 report recommended no immediate action, but advised proper worker and environmental protection procedures if lead-positive areas were disturbed. The report also stated that additional testing may be required if untested paint was discovered.

3.5.5 Radon Report

The USAR conducted a *Radon Building Survey* at the Site on August 5, 1998. According to the radon survey report, no radon levels above the USEPA-recommended action level of 4.0 picocuries per liter (pCi/L) were detected.

3.5.6 Asbestos Report

The USAR conducted an *Asbestos Building Re-inspection* of the USAR Center in August 1998. The date of the original asbestos survey is unknown; however, relevant sections were referenced in the 1998 re-inspection. According to the re-inspection report, an attempt was made to relocate the asbestos-containing material (ACM) identified in the original survey. The results of the re-inspection are shown in Table 2.

Table 2 1998 Asbestos Re-inspection Survey Results		
Material	Description	Status
SAN.BOSWEL.0501	Floor Tile	Removed
SAN.BOSWEL.0701	Tank/Vessel	Low Probability for Disturbance, Damaged
SAN.BOSWEL.1101	Insulation, Tank Bracket	Low Probability for Disturbance, Good Condition
SAN.BOSWEL.1501	Heat/Chill Water Lines	Low Probability for Disturbance, Damaged
SAN.BOSWEL.1701	Vibration Gasket	High Probability for Disturbance, Damaged
SAN.BOSWEL.1801	Gasket/Boiler Door	Low Probability for Disturbance, Damaged
SAN.BOSWEL.2101	Mastic/Roof Flashing	Low Probability for Disturbance, Damaged

No recommendations were made as a result of the 1998 re-inspection.

3.5.7 Cultural Resources Report

Parsons issued two reports in February 1998: *Archaeological Assessment and Reconnaissance of 90th Regional Support Command Facilities in Texas* and *Management Summary, Cultural Resources Assessment of 90th Regional Support Command, Facilities in Arkansas, Louisiana, New Mexico, Oklahoma and Texas*. The assessments concluded that there were no architectural or archaeological issues at the Site. The Site has a "low" archaeological potential and is not eligible for the National Register of Historic Places.

3.5.8 Polychlorinated Biphenyls Report

The U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) performed a *Polychlorinated Biphenyls (PCB) Assessment, No. 37-08-5615-97*. The assessment was compiled and issued on September 30, 1997, and addressed three pole-mounted transformers (PMTs) on the east side of the Training Building and three PMTs south of the OMS. The PMTs, owned by City Public Service, were manufactured by Central Malone on an unknown date. The USACHPPM assessment report listed all six of the transformers as non-PCB-containing and in good condition. The report also indicated that some of the fluorescent lights at the Site had PCB-containing ballasts.

4.0 ADJACENT PROPERTIES

Figure 19 in Appendix A provides a 2004 aerial view of the Site and adjacent properties. The property is bounded by the Southside Church of God and a single-family residential neighborhood to the north, Boswell Street and a City Public Services (administrative) building to the west, a shopping center and SW Military Drive to the south, and a shopping center to the east. Table 3 provides a list of adjacent properties with their directional location from the Site and zoning.

Table 3 List of Adjacent Properties			
Direction From Site	Name/Type of Property	Address	Zoning
North	Southside Church of God	406 Boswell Street	R6 — Residential
South	SW Military Drive — Guarantee Bank, Little Caesars Pizza; Direct Auto Insurance	438 SW Military Drive	C3 — Commercial
East	Mixed Commercial — Warehouse Furniture; International Fabric Outlet; Collectors Authority	431 SW Military Drive	C2/C3 — Commercial
West	City Public Services	509 SW Military Drive	C3 — Commercial

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 nearby 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 environmental database report is included in Appendix E.

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

The TEJV interviewed local authorities and reviewed reasonably accessible USAR environmental documents, TCEQ files, and historical aerial photographs and maps to investigate environmental conditions at the Site and surrounding area. Available information on potential impacts to the Site was assessed.

The TEJV conducted 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 is incorporated into this report.

5.1 FEDERAL ENVIRONMENTAL RECORDS

5.1.1 Federal NPL Sites within One Mile

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

5.1.2 Federal CERCLIS Sites within One-Half Mile

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies, and persons, pursuant to Section 103 of CERCLA. 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 upon 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 facility, and no CERCLIS or CERCLIS NFRAP facilities are located 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 Sites (CORRACTS) identifies hazardous waste handlers with RCRA corrective action activity. According to the environmental database report, the USAR Center is not a CORRACTS, and no CORRACTS were identified within one mile of the Site.

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

The RCRA Information (RCRAInfo) Database is USEPA's comprehensive information system that includes selective data 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. According to the environmental database, the USAR Center is not a RCRA TSD facility, and no RCRA TSD facilities are located 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 generate less than 100 kg of hazardous waste, or 1 kg of acutely hazardous waste, per month. RCRA small-quantity generators (SQGs) are defined as generating between 100 kg and 1,000 kg of hazardous waste per month, while a large-quantity generator (LQG) generates more than 1,000 kg of hazardous waste, or more than 1 kg of acutely hazardous waste, per month. No LQGs were identified on the RCRAInfo database within one-quarter mile.

The USAR Center is listed as a RCRA SQG (USEPA ID TX7210022599) with no reported RCRA violations, and a notation in the RCRAInfo database indicating the facility is “not a HW generator” currently. According to the Texas Industrial and Hazardous Waste (IHW) database, the Site’s most recent registration was in 2004. Information in TCEQ’s files for the Site reflects the same information provided by the environmental database search report.

One other RCRA SQG facility is located within one-quarter mile of the Site. The Sherwin-Williams Company (USEPA ID TXD000812412) is at 431 Military Drive, approximately 171 feet west of the Site. According to the environmental database search report, no RCRA violations have been reported. A 1982 letter, obtained from the TCEQ and addressed to Mr. Michael Spillman, Manager of the Sherwin-Williams facility, states that “the subject facility does not, at this time, generate hazardous waste....” No other information pertaining to this site was available for review at the TCEQ office. This property is considered to represent a low risk to the Site due to the lack of documented releases.

5.1.6 Federal Emergency Response Notification System List

The Emergency Response Notification System (ERNS) is used to record and store information on reported releases of oil and hazardous substances. According to the environmental database report, no sites were identified on the ERNS.

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 TCEQ Web site.

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 are no solid waste facilities/landfill sites on Site or located within one-half mile.

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

According to the environmental database report, eight leaking petroleum storage tank (LPST) sites were identified within one-half mile of the Site. Table 4 lists the sites along with their addresses and elevations relative to the Site. The Site itself is not listed in the state LPST database.

The TEJV researched and reviewed files in the TCEQ offices in San Antonio and Austin, and visually observed each LPST site in the field. As shown in Table 4, all eight LPST sites have received closure approval from TCEQ, indicating no further remedial action is required and, with the exception of the K-Mart site, that residual petroleum contamination does not pose a concern for human health or the environment. Therefore, those seven LPST sites are considered to represent low risks to the Site.

A July 2004 internal TCEQ e-mail indicated that gasoline vapors were encountered during excavation activities in the vicinity of the former K-Mart site, 238 SW Military Drive, which is approximately 628 feet east of the Site and approximately three feet topographically lower in elevation. Information in the e-mail stated vapors measured 10% of the lower explosive limit (LEL) at a distance of 200 feet from the excavation (direction was not provided). No further information pertaining to the gasoline vapor incident was available for review. The potential for residual soil and/or groundwater contamination at the K-Mart facility is considered to represent a "High Risk" to the USAR Center, since elevated gasoline vapors were identified as close as 430 feet (depending on the direction from the Site). TCEQ documentation for these sites is in Appendix D.

5.2.3 State-Registered Petroleum Storage Tank Sites within One-Quarter Mile

Petroleum storage tanks (PSTs) are regulated under RCRA Subtitle I and must be registered with the state department responsible for administering the UST program. The environmental database report identified eight UST sites from the state PST database within one-quarter mile of the Site. The Site itself is also a UST Site. Table 5 lists the sites along with their addresses and elevation relative to the Site. Except for the K-Mart site, which was already discussed as a "High Risk" to the Site in Section 5.2.2, the remaining UST sites are considered to represent low risks to the USAR Center due their distance from the Site and/or their lower elevation relative to the Site.

5.2.4 State Spills Incidents

The Texas State Spills database did not identify the Site as having a spill incident.

5.2.5 Voluntary Action 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, the USAR Center is not in the VCP and there are no VCP sites located within one-half mile of the Site.

**Table 4
 Leaking Petroleum Storage Tank Sites**

Site Name/ Facility No.	Address	Distance and Direction from Site	Status	Elevation Relation to Site
Thornton Oil Corp 131 #0032632	310 SW Military Drive San Antonio, Texas	Approximately 183 feet east of the Site	A release was reported in March 1998. According to the environmental database report, the case has been closed with final concurrence issued.	Lower
K-Mart 3493 #0015716	238 SW Military Drive San Antonio, Texas	Approximately 628 feet east of the Site	A release was reported in April 1991 with minor soil contamination. According to TCEQ documents, the case was closed with final concurrence issued September 26, 1996. A July 2004 TCEQ e-mail indicated gasoline vapors were encountered during excavation activities in the vicinity of the former K-Mart site. The e-mail stated vapors measured 10% of the LEL at a distance of 200 feet from the excavation (direction not provided). No further information was available for review.	Lower
Sears & Roebuck 1047 #0056924	735 SW Military Drive San Antonio, Texas	Approximately 1,218 feet west/southwest of the Site	A release, impacting groundwater, was reported in February 1997. According to the environmental database report, final concurrence will be issued after documentation regarding a well plugging is received.	Higher
Jack-in-the-Box 806 Former SS Facility ID Not reported	742 SW Military Drive San Antonio, Texas	Approximately 1,259 feet west/southwest of the Site	A release that impacted groundwater was reported in April 1997. According to the environmental database report, the case has been closed with final concurrence issued.	Higher
Don Bierschwale Property #0047652	6650 South Flores Street San Antonio, Texas	Approximately 1,390 feet east of the Site	A release was reported in September 1995. Groundwater was not impacted. According to the environmental database report, the case has been closed with final concurrence issued.	Lower

**Table 4
 Leaking Petroleum Storage Tank Sites**

Site Name/ Facility No.	Address	Distance and Direction from Site	Status	Elevation Relation to Site
Skyway Food Mart #0001163	6226 South Flores Street San Antonio, Texas	Approximately 1,632 feet north/northeast of the Site	A release that impacted groundwater was reported in December 1998. According to the database query, the case has been closed with final concurrence issued; however, no documentation confirming closure was available for review.	Lower
Firestone Service Center #0044277	2415 Pleasanton Road San Antonio, Texas	Approximately 1,676 feet west/southwest of the Site	A release was reported in August 1992 with minor soil contamination. According to the environmental database report, the case has been closed with final concurrence issued; however, no documentation confirming closure was available for review.	Higher
TETCO 261 #0028609	903 SW Military San Antonio, Texas	Approximately 2,123 feet west of the Site	A release, impacting groundwater, was reported in November 1989. The case has been closed with final concurrence issued; however, no documentation confirming closure was available for review.	Higher

Table 5
Underground Storage Tank Sites

Company/Site	Address	Distance and Direction from Site	Status	Elevation Relation to Site
San Antonio US Army Reserve Center #2 #0069243	432 Boswell Street San Antonio, Texas	Site	One 1,436-gallon OWS is currently in use.	Site
Thornton Oil Corp 131 #0032632	310 SW Military Drive San Antonio, Texas	Approximately 183 feet east of the Site	One 12,000-gallon, two 10,000-gallon, and one 2,000-gallon gasoline USTs have been removed.	Lower
K-Mart 3493 #0015716	238 SW Military Drive San Antonio, Texas	Approximately 628 feet east of the Site	One 1,000-gallon used oil UST has been removed. A 2004 TCEQ e-mail indicates residual contamination may still exist	Lower
HEB #0071947	735 SW Military Drive San Antonio, Texas	Approximately 1,218 feet west/southwest of the Site	One 23,000-gallon gasoline UST is currently in use.	Higher
Sears & Roebuck 1047 #0056924	735 SW Military Drive San Antonio, Texas	Approximately 1,218 feet west/southwest of the Site	One 1,000-gallon used oil UST has been removed.	Higher
Don Bierschwale Property #0047652	6650 South Flores Street San Antonio, Texas	Approximately 1,390 feet east of the Site	Three gasoline USTs have been removed. The capacities of the USTs were not provided.	Lower
Skyway Food Mart #0001163	6226 South Flores Street San Antonio, Texas	Approximately 1,632 feet north/northeast of the Site	Two 3,000-gallon, one 6,000-gallon, and one 4,000-gallon gasoline USTs have been removed. One 15,000-gallon gasoline UST is currently in use.	Lower
Firestone Service Center #0044277	2415 Pleasanton Road San Antonio, Texas	Approximately 1,676 feet west/southwest of the Site	One 290-gallon used oil UST has been removed.	Higher
TETCO 261 #0028609	903 SW Military San Antonio, Texas	Approximately 615 feet west of the Site	Four 10,000-gallon gasoline USTs have been removed.	Higher

5.2.6 State Brownfields Program Sites within One-Half Mile

Included in this 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, the USEPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. TBA supplement and work with other efforts under the USEPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. The TCEQ maintains a Brownfields Site Assessment database. According to the environmental database report, the USAR Center is not in the Brownfield program and there are no Brownfields sites located within one-half mile of the Site.

5.2.7 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. According to the environmental database report, the USAR Center is not subject to engineering controls and there are no state-registered sites requiring engineering land use controls within one-half mile of the Site.

5.2.8 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. According to the environmental database report, the USAR Center is not subject to institutional controls and there are no state-registered sites with Institutional Controls within one-half mile of the Site.

5.2.9 State-Registered Dry-Cleaning Facilities within One-Quarter Mile

According to the environmental database report, the USAR Center is not a dry cleaner and there are no state-registered Dry-Cleaning Facilities within one-quarter mile of the Site.

5.2.10 State-Registered Oil/Gas Well Sites within One Mile

One state oil/gas well is located approximately one-half mile east/southeast of the Site. Due to the distance from the Site and no reported environmental concerns, this site poses a low risk to the USAR Center.

5.2.11 Industrial and Hazardous Waste Database

The TCEQ maintains an 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 listed on the IHW Database with a notation of "Not a HW Generator."

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 the IOP. The IOP is for 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. 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 Edwards Aquifer Authority regulates the withdrawal of water from the Edwards Aquifer, the primary drinking water source for the San Antonio area. The Site is not within the Edwards Aquifer zone.

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, no manufactured gas plants are 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 either of these databases.

5.3 TRIBAL ENVIRONMENTAL RECORDS

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

5.4 UNMAPPED SITES

The environmental database search yielded 43 unmapped sites. Unmapped sites are those with address information sufficient only to identify as within the zip code of the target Site. Every effort was made by the TEJV to locate these sites and assess their relevance or impact to the Site. Further research was conducted using maps of the Site and surrounding area. None of the sites were estimated to be within the corresponding ASTM D 6008-minimum search distance for the databases on which they appeared.

5.5 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO SITE

During review of environmental information summarized in this section, multiple databases and sites were reviewed to evaluate potential risks to the Site. Based on an evaluation of available site information and details concerning the properties discussed in Section 5, only one adjacent or surrounding facility evaluated is 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 the Site.

The former K-Mart facility at 238 SW Military Drive had a release reported in 1991. The K-Mart facility is approximately 628 feet east of the Site and is at a lower elevation. TCEQ issued final concurrence on the 1991 release and the case was closed in 1996. A July 2004 internal TCEQ e-mail indicated gasoline vapors were encountered during excavation activities in the vicinity of the former K-Mart facility USTs. Information in the e-mail stated vapors measured 10% of the LEL at a distance of 200 feet from the excavation. The potential for residual soil and/or groundwater contamination to impact the Site is considered to represent a "High Risk" to the USAR Center because of the proximity to detected vapors. No further information pertaining to this incident was available for review at the TCEQ.

6.0 SITE INVESTIGATION AND REVIEW OF HAZARDS

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

6.1 USTs/ASTs

No ASTs were observed on the Site.

The OWS located at the Site consists of three concrete vessels which are registered as one UST. According to the *Oil-Water Separator Evaluation* report conducted in 2000, these concrete vessels have a capacity of 100 gallons, 300 gallons, and 1,100 gallons and receive wash water from the VWR and the drains in the OMS. Wastewater from the OWS system discharges to the sanitary sewer system. The tanks were registered with the TCEQ in 1997 as one 1,436-gallon tank system. During the Site reconnaissance, no surface stains were observed around the VWR or OWS.

6.2 INVENTORY OF CHEMICALS/HAZARDOUS SUBSTANCES

Three pre-fabricated steel hazardous material storage sheds (with containment flooring) located south of the OMS in the MEP area are primarily used for the storage of POL and solvents. Additional flammable materials storage lockers for hazardous substances and petroleum products, including paint, brake fluid, antifreeze, solvent (skysol), paint thinner, and miscellaneous POL, were observed inside the OMS along the south wall of the shop and on the south wall of the office. No spills or stains were observed in the area surrounding the hazardous material storage sheds or the flammable materials storage lockers.

A drum storage area is located on a concrete pad south of the OMS (Photographs 22 and 23 in Appendix B). During the Site reconnaissance, empty 5-, 30-, and 55-gallon were stored in that area. *De minimis* staining was observed on the concrete pad which may be indicative of a release of residual material from the drums.

6.3 WASTE DISPOSAL SITES

There were no waste disposal activities observed during the Site reconnaissance and no available records indicating past waste disposal activities at this facility. All solid waste generated at the USAR Center is collected in a Dumpster located on the south side of the OMS for offsite disposal by Waste Management, Inc.

Scrap fencing, discarded packing crates, and other debris were observed in the southwest portion of the MEP (Photographs 26 and 27 in Appendix B). No hazardous materials were observed in this area.

6.4 PITS, SUMPS, DRY WELLS, AND CATCH BASINS

Floor drains in the OMS restrooms and janitorial closets facilitate cleaning, as well as receive water from a utility sink. Trench drains in the OMS maintenance bay area receive rain water from the open bay doors. According to the *Oil-Water Separator Evaluation* report (EnSafe, 2000), the floor drains in the OMS discharge directly to the OWS located west of the OMS; however, this could not be confirmed during the Site reconnaissance.

Floor drains in the Training Building kitchen and restrooms reportedly discharge to the sanitary sewer. Floor drains in the Training Building mechanical room appear to receive condensate from the heating, ventilating, and air conditioning system.

Evidence of an underground grease pit was observed on the northwest corner of the Training Building. No records concerning the grease pit were available for review.

6.5 ASBESTOS-CONTAINING MATERIAL

Table 2 in Section 3.5.6 shows the condition of ACM noted during the 1998 USAR asbestos re-inspection. As noted in Table 2, damaged ACM was observed during the 1998 re-inspection. During the Site reconnaissance, the ACM identified in 1998 could not be located by TEJV personnel.

6.6 PCB-CONTAINING EQUIPMENT

As discussed in Section 3.5.8, a 1997 PCB assessment indicated there are no known PCB-containing transformers on the Site. The 1997 report indicated some of the fluorescent lights at the Site have PCB-containing ballasts. USAR personnel indicated some of the lights at the Site have been replaced, but fluorescent light fixtures with PCB-containing ballasts may still remain at the Site.

6.7 LEAD-BASED PAINT

A 2001 LBP survey identified LBP throughout the Training Building and OMS. During the Site reconnaissance, paint in the areas where LBP was found in 2001 appeared to be in good condition and not peeling or chipping.

6.8 RADON

As discussed in Section 3.5.5, radon tests were performed at the Site in 1998 and all sample results were less than 4.0 pCi/L, which is the USEPA-recommended action level. Additionally, Bexar County is in USEPA Radon Zone 3, which indicates an average indoor radon level of less than 2 pCi/L.

6.9 UNEXPLODED ORDNANCE

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

6.10 RADIOACTIVE MATERIALS

No indications during the records review indicated the past storage or use of radiological commodities at the Site; however, signage in the Training Building storage area indicated the storage of radiation source(s). According to Site personnel, the signage is from when radiation survey equipment was stored in the area as part of the 90th RRC's Nuclear, Biological, and Chemical (NBC) program. The equipment is no longer at the facility. The storage area could not be accessed during the Site reconnaissance because the storage area is under the control of the NBC officer who was not present. However, Site personnel indicated that the material stored consisted of Geiger Counters (e.g., pancake meters) that have an associated sealed source that is used for calibration of the instrument. Due to the nature of the source, this material is considered to pose a low risk to the USAR Center.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

Figure 19 in Appendix A provides a 2004 aerial photograph of the USAR Center and surrounding properties. According to the City of San Antonio's Office of Planning and Development Web site, the Site is in Zone C1 - Commercial, and is surrounded by commercially and residentially zoned areas.

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 130 miles inland from the Gulf of Mexico. Bexar County is not included in the Texas Coastal Management Plan.

7.3 WETLANDS

The Site is upland and well drained. A search for wetland information was conducted online on the U.S. Fish and Wildlife Service Web site, with no digital data available for the Site. Wetland information was also requested at the USDA office, but none was available. Additionally, the EDR report stated no digital wetlands information was available.

7.4 100-YEAR FLOODPLAIN

FEMA Flood Hazard Area map (Figure 25 in Appendix A) information obtained online from the FEMA Web site and the environmental database report indicates that the Site lies outside the 100-year flood plain. According to the FEMA Flood Insurance Rate Map for Bexar County, Texas (Map Number 48029C0626 E, February 16, 1996), the Site is in "Zone X." Zone X is defined by FEMA as "other flood areas."

7.5 NATURAL RESOURCES

No survey has been conducted at the Site for threatened and endangered species. Due to the mixed commercial/residential zoning of the area, other than incidental use by migrants, threatened and/or endangered species are unlikely to occur at the Site.

7.6 CULTURAL RESOURCES

As described in Sections 3.5.3 and 3.5.7, architectural and cultural resource assessments were performed for the Site. The conclusion was that there were no architectural or archaeological issues at the Site. The Site has a “low” archaeological potential and is not eligible for the National Register of Historic Places.

7.7 OTHER SPECIAL RESOURCES

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

8.0 CONCLUSIONS

The TEJV, under contract to the USACE, Louisville District, has prepared this ECP Report for the Boswell Street USAR Center (Facility ID TX062), at 423 Boswell Street in San Antonio, Bexar County, Texas. The Site encompasses approximately 8 acres of land and has two permanent structures: a Training Building and an OMS. The Site is currently occupied by three units: the 694th Maintenance BN, the 238th Maintenance CO, and the 340th QM CO.

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 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 1 kg of acutely hazardous waste. Three pre-fabricated steel hazardous material storage sheds (with containment flooring) located south of the OMS in the MEP area are primarily used for the storage of POL and solvents. Additional flammable materials storage lockers for hazardous substances, including paint, brake fluid, antifreeze, solvent (skysol), paint thinner, and miscellaneous POL, were observed in the OMS along the south wall of the shop and on the south wall of the office. No spills or stains were observed in the area surrounding the hazardous material storage sheds or flammable materials storage lockers.

Empty drums were stored on a concrete pad south of the OMS. Although staining was observed on the concrete pad which may be indicative of a release of residual material from the drums, the amount of staining is considered *de minimis*.

- **USTs/ASTs.** The Site has one registered UST (1,436 gallons) associated with the OWS. The UST actually consists of three pre-cast concrete sumps which discharge, via a pump, to an aboveground recycling system and eventually to the sanitary sewer system. The OWS was installed before 1982 and the recycling system added in 1995. No information relating to the configuration or operation of the OWS prior to 1982 was available for review. No ASTs have been in use at the Site.
- **Waste Disposal Sites.** Scrap fencing, discarded packing crates, and other debris were observed in the southwest portion of the MEP. No hazardous materials were observed in this area.

- **PCBs.** There are no known PCB-containing transformers on the Site. USAR personnel indicated that although some of the lights at the Site have been replaced since the 1997 PCB survey was conducted, fluorescent light fixtures with PCB-containing ballasts may still remain at the Site.
- **Asbestos.** The USAR conducted an asbestos building re-inspection of the USAR Center in August 1998. According to the re-inspection report, an attempt was made to relocate the ACM identified in the original survey (date unknown). Based on information contained in the re-inspection report, ACM currently remains on the Site.
- **Lead-Based Paint.** The USAR conducted a LBP survey of the Site in 2001. During the survey of the Training Building, LBP was found on the interior black stair rail, exterior brown metal door and frames, an exterior brown stair rail, and the exterior overhead door frame. In the maintenance area, LBP was found on the brown overhead door frame, yellow safety paint and bumper guard, brown doorframes, the roof drain, and the beige metal support beam. The 2001 report recommended no immediate action, but advised proper worker and environmental protection procedures if lead-positive areas were disturbed. The report also stated that, if untested paint was discovered, additional testing may be required. During the Site reconnaissance, paint in the areas where LBP was found in 2001 appeared to be in good condition.
- **Radiological Materials.** Radiological materials were reportedly stored in small quantities at this Site as part of the 90th RRC NBC program. The presence or absence of these materials could not be verified during the Site reconnaissance because the storage area is under the control of the NBC officer who was not present. However, Site personnel indicated that the material stored consisted of Geiger Counters (i.e., pancake meters) that have an associated sealed source which is used for calibration of the instrument. Due to the nature of the source, this material poses a low risk to the USAR Center.
- **Radon.** A radon survey performed at the Site in 1998 indicated all levels detected were less than 4.0 pCi/L. The USEPA-recommended action level is 4.0 pCi/L; therefore, radon is not an environmental concern at the Site.
- **Munitions and Explosives.** No evidence was found during the Site reconnaissance or records review process of the past presence of munitions and explosives of concern.
- **Surrounding Properties.** Based on an evaluation of available information, all but one adjacent or surrounding facility evaluated is classified as a "low risk" to the Site. The K-Mart facility at 238 SW Military Drive, approximately 628 feet east and approximately three feet topographically lower in elevation than the Site, is

considered a "High Risk." A UST was removed from the former K-Mart facility in April 1991, a release was confirmed, and TCEQ issued final closure approval in 1996. However, a July 2004 TCEQ e-mail indicated gasoline vapors were encountered during excavation activities in the vicinity of the former USTs. Information in the e-mail stated vapors measured 10% of the LEL at a distance of 200 feet from the excavation (direction not provided). The potential for residual soil and/or groundwater contamination at the K-Mart facility is considered to represent a "High Risk" to the USAR Center, since elevated gasoline vapors were identified as close as 430 feet (depending on the direction from the Site).

Areas of potential environmental concern were reviewed and the TEJV found no significant concerns relating to the environmental condition of the Site. One surrounding property was considered a "High Risk" to the Site based on TCEQ information. 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

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- Albelardo Flores, Unit Administrator, Boswell Street USAR Center, (210) 922-6327. Meeting on August 16, 2006.
- Edward Salinas, Mechanic, Boswell Street USAR Center, (210) 922-2796. Meeting on August 16, 2006.

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- Department of the Army, 90th Regional Support Command, Environmental Section. *Asbestos Building Re-inspection, Boswell Street USAR Center, San Antonio, Texas.* August 1998.
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- U.S. Army Center for Health Promotion and Preventive Medicine. *Polychlorinated Biphenyls (PCB) Assessment No. 37-08-5615-97* (for 90th Regional Support Command). September 30, 1997.
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- U.S. Department of Agriculture, National Resources Conservation Service, *Web Soil Survey*. <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>
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AGENCIES CONTACTED

- Texas Commission on Environmental Quality

Appendix A
Figures

FIGURES

Figure 1	General Site Location Map
Figure 2	Site Layout Plan
Figure 3	Existing Maintenance Shop Floor Plan
Figure 4	Existing Training Building First Floor Plan
Figure 5	Existing Training Building Second Floor Plan
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Figure 16	1977 Aerial Photograph
Figure 17	1986 Aerial Photograph
Figure 18	1992 Aerial Photograph
Figure 19	2004 Aerial Photograph
Figure 20	FEMA Flood Plain Map

Appendix B
Site Reconnaissance Photographs

Appendix C
Chain-of-Title Report

Appendix D
Previous Environmental Reports

PREVIOUS ENVIRONMENTAL REPORTS

1. Department of the Army, 90th Regional Support Command, Environmental Section. *Asbestos Building Re-inspection, Boswell Street USAR Center, San Antonio, Texas.* August 1998.
2. Department of the Army, 90th Regional Support Command, Environmental Section. *Lead-Based Paint Survey, Boswell Street USAR Center, San Antonio, Texas.* November 2001.
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Appendix E
Regulatory Database Search Reports

**FINAL ENVIRONMENTAL CONDITION OF PROPERTY REPORT
BOSWELL STREET — U.S. ARMY RESERVE CENTER (TX062)
423 BOSWELL STREET — SAN ANTONIO, TEXAS 78214
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