

DRAFT

**FINDING OF SUITABILITY TO TRANSFER
(FOST)**

**James W. Reese US Army Reserve Center
(PA015)**

Chester, Pennsylvania

September 2012

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1. PURPOSE

The purpose of this Finding Of Suitability To Transfer (FOST) is to document the environmental suitability of certain parcels or property at James W. Reese US Army Reserve (USAR) Center (PA015) for transfer to the Upland Borough of Local Redevelopment Authority consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy. In addition, the FOST includes the CERCLA Covenant and Access Provisions and other Deed Provisions and the Environmental Protection Provisions (EPPs) necessary to protect human health or the environment after such transfer.

2. PROPERTY DESCRIPTION

The property consists of 5.0 acres, which includes three permanent buildings: Administration Building, Organizational Maintenance Shop (OMS), storage building and approximately 1 acre of undeveloped land. The property was previously used as administrative, training and logistical purposes and vehicle and equipment maintenance. The property is intended to be transferred as a community and youth center and is consistent with the intended reuse of the property as set forth in the Upland Borough of Local Redevelopment Authority's Reuse Plan. A site map of the property is attached (Enclosure 1).

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the property was made based upon an Environmental Condition of Property (ECP) Report prepared in February 2007 and supplemented by an ECP Update Report in March 2012 and Environmental Condition of Property Recertification in August 2012. The information provided is a result of a complete search of agency files during the development of these environmental surveys.

A complete list of documents providing information on environmental conditions of the property is attached (Enclosure 2).

4. ENVIRONMENTAL CONDITION OF PROPERTY

The DOD Environmental Condition of Property (ECP) categories for the property are as follows:

ECP Category 1: James W. Reese USAR Center (PA015); entire parcel including all building structures.

A summary of the ECP categories for parcels and the ECP category definitions is provided in Table 1 – Description of Property (Enclosure 3).

4.1. Environmental Remediation Sites

There are no environmental investigation/remediation sites and no evidence of groundwater contamination on the property.

4.2. STORAGE, RELEASE, OR DISPOSAL OF HAZARDOUS SUBSTANCES

There is no evidence that hazardous substances were stored, released, or disposed of on the property in excess of the 40 CFR Part 373 reportable quantities. See Section 3.3 of the 2007 ECP for further information. The CERCLA 120(h)(4) Covenant and Access Rights at Enclosure 6 will be included in the Deed.

4.3. PETROLEUM AND PETROLEUM PRODUCTS

4.3.1. UNDERGROUND AND ABOVE-GROUND STORAGE TANKS (UST/AST)

- **Current UST/AST Sites** - There are no current underground and/or above-ground petroleum storage tanks (UST/AST) on the property.
- **Former UST/AST Sites** – There is no evidence that petroleum products were stored in underground or above-ground storage tanks on the property in the past.

A summary of the UST/AST petroleum product activities is provided in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 4).

4.3.2. Non-UST/AST Storage, Release, or Disposal of Petroleum Products

There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on the property.

4.4. POLYCHLORINATED BIPHENYLS (PCB)

The following equipment is located on the property and may contain PCBs: pad-mounted transformer adjacent to storage building. This equipment is owned and operated by PECO Energy Company and has been determined not to be leaking.

4.5. ASBESTOS

There is asbestos-containing material (ACM) in the following buildings: Administration Building. See *Asbestos Visual Inspection Report* (Small Business Group, July 2012) for additional information (Enclosure 8).

There is ACM in the Administration Building in the following areas: non friable 12" black floor tile with white streaks and mastic in rooms 102, 104, 114, 116, E- 001, and H-100, H-101, H-102 and H-103 in good condition, non friable 12" gray floor tile with white streaks and mastic in rooms 102, 104, 114, 116, E- 001, and H-100, H-101, H-102 and H-103 in good condition, non friable gray door caulking around all interior doors in good condition, non friable vault door in room 115 in good condition, friable aircell piping insulation in rooms 105, 107 and in pipe chases in damaged condition, friable mudded fitting insulation in rooms 105, 107 and in pipe chases in good condition, non friable mastic under 12" white floor tile in room 115 in good condition, non friable 9" black floor tile & mastic under top layer of floor tile in rooms 200, 201, 202, 203, 204, 205, 206, 207, 209, 210, 214, 215, H-200 and S-002 in good condition, non friable 9" tan floor tile and mastic under top layer of floor tile in rooms 200, 201, 202, 203, 204, 206, 209, 210, 214, 215, H- 200, and S-002 in good condition, non friable 9" white floor tile with white streaks and mastic in Room 207 in good condition.

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the Grantee will be notified of the presence of the ACM and the property will only be transferred if the Grantee agrees to undertake any and all asbestos abatement or remediation that may be required under applicable law. Further, the Grantee will covenant and agree that its use and occupancy of the property will be in compliance with all applicable laws relating to asbestos. The deed will include an asbestos warning and covenant. (Enclosure 6).

4.6. LEAD-BASED PAINT (LBP)

The following buildings are known or presumed to contain lead-based paint (LBP): Administration Building and OMS. See Section 6.7 of the 2007 ECP Report for additional information. The property was not used for residential purposes and the transferee does not intend to use the property for residential purposes in the future. The deed will include a lead-based paint warning and covenant (Enclosure 7).

The following buildings are known to contain lead contaminated dust from a former indoor firing range: Administration Building. Lead contaminated dust was remediated after the range was closed. See *Field Investigation and Sampling Report for USARC Indoor Rifle Range at James Reese USARC*, dated April 27, 1992, prepared by Gillan & Hartmand, Inc. for additional information.

4.7. RADIOLOGICAL MATERIALS

There is no evidence that radioactive material or sources were released on the property. All radioactive materials have been removed from the property. The Army completed a radiological survey of the Property in compliance with the accepted federal government protocol (MARSSIM Class 3). The Radiological Assessment Report found no evidence that radiological contamination or radioactive material was present and concluded that the Property can be considered non-impacted and available for unrestricted use relative to radioactive materials. On 18 June 2012, the US Army

Chief of Staff for Installations BRAC Deputy concluded the site is free of radiological concerns. See Enclosure 7 for additional information.

4.8. RADON

A radon survey was conducted in 1992 at the Property (building locations not provided). Radon was not detected at above the EPA residential action level of 4 picocuries per liter (pCi/L) at the USAR Center. See Section 6.8 of the 2007 ECP Report for additional information.

4.9. MUNITIONS AND EXPLOSIVES OF CONCERN (MEC)

Based on a review of existing records and available information, there is no evidence that Munitions and Explosives of Concern (MEC) are present on the property. In addition the property has historically been used as an administrative and vehicle maintenance facility. The term "MEC" means military munitions that may pose unique explosives safety risks, including: (A) unexploded ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (B) discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (C) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

4.10. OTHER PROPERTY CONDITIONS

There are no other hazardous conditions on the property that present an unacceptable risk to human health and the environment.

5. ADJACENT PROPERTY CONDITIONS

There are no conditions adjacent to the property that present an unacceptable risk to human health and the environment.

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

There are no environmental remediation orders or agreements applicable to the property being transferred. The deed will include a provision reserving the Army's right to conduct remediation activities if necessary in the future (Enclosure 6).

7. REGULATORY/PUBLIC COORDINATION

The U.S. EPA Region 3, the Pennsylvania Department of Environmental Protection (PADEP), and the public were notified of the initiation of this FOST. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate. A copy of the regulatory/public comments and the Army Response will be included at Enclosure 9.

8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts associated with the proposed transfer of the property have been analyzed in accordance with the National Environmental Policy Act (NEPA). The results of this analysis are documented in the *Environmental Analysis, BRAC 05 Recommendations for Closure, Disposal and Reuse of James W. Reese United States Army Reserve Center, Upland, Pennsylvania*, December, 2012. There were no encumbrances or condition identified in the NEPA analysis as necessary to protect human health or the environmental.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the information above, I conclude that the Property qualifies as CERCLA §120(h)(4) uncontaminated property and is transferable under that section. In addition, all Department of Defense requirements to reach a finding of suitability to transfer have been met, subject to the terms and conditions in the Environmental Protection Provisions that shall be included in the deed for the property. The deed will include the CERCLA 120(h)(4) Covenant and Access Provisions and Other Deed Provisions. Whereas no hazardous substances or petroleum products were stored for one year or more, known to have been released, or disposed of on the parcel, a hazardous substance or petroleum notification is not required.

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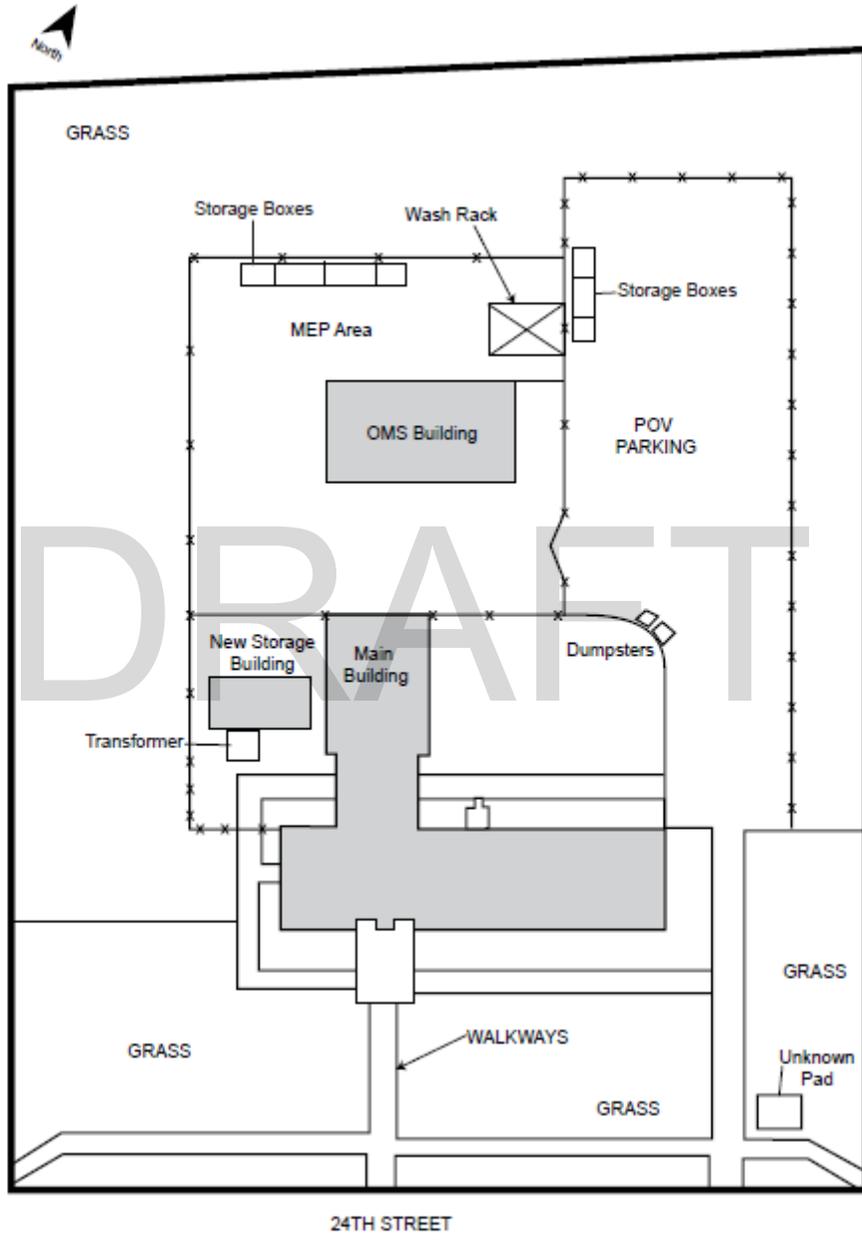
WILLIAM D. R. WAFF
Major General

Date

- Encl 1 - Site Map of Property
- Encl 2 - Environmental Documentation
- Encl 3 - Table 1 -- Description of Property
- Encl 4 - Table 2 -- Notification of Petroleum Product Storage, Release, or Disposal
- Encl 5 - Access Provision and Other Deed Provisions
- Encl 6 - Environmental Protection Provisions
- Encl 7 – Radiological Memo
- Encl 8 – Asbestos Visual Reinspection Report
- Encl 9 - Regulatory/Public Comments and Army Response

ENCLOSURE 1

SITE MAP OF PROPERTY



ENCLOSURE 2

ENVIRONMENTAL DOCUMENTATION

Document	Source
Environmental Condition of Property Report for James W. Reese U.S. Army Reserve Center (PA015), 500 West 24th Street, Chester, Pennsylvania, CH2M Hill, February 2007	USACE
Environmental Condition of Property Update Report, James W. Reese U.S. Army Reserve Center (PA015), 500 West 24th Street, Chester, Pennsylvania, XCEL Engineering, March 2012	USACE
Finding of No Significant Impact for BRAC 05 Recommendations For Closure, Disposal and Reuse of James W. Reese United States Army Reserve Center, Upland, Pennsylvania, February, 2012	99 th RSC
Radiological Memo, June 2012	99 th RSC
Field Investigation and Sampling Report for USARC Indoor Rifle Range at James Reese USARC, 500 W. 24th Street, Chester, PA, Gillan & Hartman, Inc., April 1992	99 th RSC
Environmental Condition of Property Recertification, August 2012	99 th RSC
Asbestos Visual Inspection Report, SBG Inc., July 2012	99 th RSC

ENCLOSURE 3

TABLE 1 – DESCRIPTION OF PROPERTY

Building Number and Property Description	Condition Category	Remedial Actions
The entire Parcel including all buildings.	1	None. On April 27, 2007, PADEP reviewed the 2007 ECP Report and stated “additional information or sampling data should be provided to document that no release has occurred or that no contamination associated with the vehicle wash rack and oil/water separator (OWS) is present”. The 99th RSC performed an OWS Inspection on January 23, 2012. According to the report, the unit is equipped with secondary containment and no unfastened connections or cracks were observed. In addition, the unit is connected to the municipal sewer system. No further action was recommended. Refer to Section 6.0 of the ECP Update Report for additional information.

- 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).

ENCLOSURE 4

TABLE 2 – NOTIFICATION OF PETROLEUM PRODUCT STORAGE, RELEASE, OR DISPOSAL

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
OMS	Oil-Laden Wastewater stored in oil/water separator	1958 to 2004	None Required. The 99th RSC performed an OWS Inspection on January 23, 2012. According to the report, the unit is equipped with secondary containment and no unfastened connections or cracks were observed. In addition, the unit is connected to the municipal sewer system. No further action was recommended. Refer to Section 6.0 of the ECP Update Report for additional information.

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ENCLOSURE 5

CERCLA NOTICE, COVENANT, AND ACCESS PROVISIONS AND OTHER DEED PROVISIONS

The following CERCLA Notice, Covenant, and Access Provisions, along with the Other Deed Provisions, will be placed in the deed to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities.

I. Property Covered by Covenant and Access Rights Made Pursuant to Section 120(h)(4)(D) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(4)(D)):

For the James W. Reese USAR Center, the Grantor provides the following covenants and retains the following access rights:

A. Covenant Pursuant to Section 120(h)(4)(D)(i) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(4)(D)(i)):

Pursuant to section 120(h)(4)(D)(i) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(4)(D)(i)), the United States warrants that any response action or corrective action found to be necessary after the date of this deed for contamination existing on the property prior to the date of this deed shall be conducted by the United States.

B. Access Rights Pursuant to Section 120(h)(4)(D)(ii) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(4)(D)(ii)):

The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the property, to enter upon the property in any case in which an environmental response or corrective action is found to be necessary on the part of the United States, without regard to whether such environmental response or corrective action is on the property or on adjoining or nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the grantee and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the grantee or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the property and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the grantee's and the grantee's successors' and assigns' quiet enjoyment of the property. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the property at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee,

charge, or compensation will be due the grantee, nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the United States.

In exercising such easement and right of access, neither the grantee nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer, employee, agent, contractor of any tier, or servant of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause: Provided, however, that nothing in this paragraph shall be considered as a waiver by the grantee and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

II. OTHER DEED PROVISIONS:

A. "AS IS"

a. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property and accepts the condition and state of repair of the subject Property. The Grantee understands and agrees that the Property and any part thereof is offered "AS IS" without any representation, warranty, or guaranty by the Grantor as to quantity, quality, title, character, condition, size, or kind, or that the same is in condition or fit to be used for the purpose(s) intended by the Grantee, and no claim for allowance or deduction upon such grounds will be considered.

b. No warranties, either express or implied, are given with regard to the condition of the Property, including, without limitation, whether the Property does or does not contain asbestos or lead-based paint. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos, lead-based paint, or other conditions on the Property. The failure of the Grantee to inspect or to exercise due diligence to be fully informed as to the condition of all or any portion of the Property offered, will not constitute grounds for any claim or demand against the United States.

c. Nothing in this "As Is" provision will be construed to modify or negate the Grantor's obligation under the CERCLA Covenant or any other statutory obligations.

B. HOLD HARMLESS

a. To the extent authorized by law, the Grantee, its successors and assigns, covenant and agree to indemnify and hold harmless the Grantor, its officers, agents, and employees from (1) any and all claims, damages, judgments, losses, and costs, including fines and penalties, arising out of the violation of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed by the Grantee, its successors and assigns, and (2) any and all any and all claims, damages, and judgments arising out of, or in any manner predicated upon, exposure to asbestos, lead-based paint, or other condition on any portion of the Property after the date of conveyance.

b. The Grantee, its successors and assigns, covenant and agree that the Grantor shall not be responsible for any costs associated with modification or termination of the NOTICES, USE

RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed, including without limitation, any costs associated with additional investigation or remediation of asbestos, lead-based paint, or other condition on any portion of the Property.

c. Nothing in this Hold Harmless provision will be construed to modify or negate the Grantor's obligation under the CERCLA Covenant or any other statutory obligations.

C. POST-TRANSFER DISCOVERY OF CONTAMINATION

a. If an actual or threatened release of a hazardous substance or petroleum product is discovered on the Property after the date of conveyance, Grantee, its successors or assigns, shall be responsible for such release or newly discovered substance unless Grantee is able to demonstrate that such release or such newly discovered substance was due to Grantor's activities, use, or ownership of the Property. If the Grantee, its successors or assigns believe the discovered hazardous substance is due to Grantor's activities, use or ownership of the Property, Grantee will immediately secure the site and notify the Grantor of the existence of the hazardous substances, and Grantee will not further disturb such hazardous substances without the written permission of the Grantor.

b. Grantee, its successors and assigns, as consideration for the conveyance of the Property, agree to release Grantor from any liability or responsibility for any claims arising solely out of the release of any hazardous substance or petroleum product on the Property occurring after the date of the delivery and acceptance of this Deed, where such substance or product was placed on the Property by the Grantee, or its successors, assigns, employees, invitees, agents or contractors, after the conveyance. This paragraph shall not affect the Grantor's responsibilities to conduct response actions or corrective actions that are required by applicable laws, rules and regulations.

D. ENVIRONMENTAL PROTECTION PROVISIONS

The Environmental Protection Provisions are at Enclosure 6, which is attached hereto and made a part hereof. The Grantee shall neither transfer the property, lease the property, nor grant any interest, privilege, or license whatsoever in connection with the property without the inclusion of the Environmental Protection Provisions contained herein, and shall require the inclusion of the Environmental Protection Provisions in all further deeds, easements, transfers, leases, or grant of any interest, privilege, or license.

ENCLOSURE 6

ENVIRONMENTAL PROTECTION PROVISIONS

The following conditions, restrictions, and notifications will be attached, in a substantially similar form, as an exhibit to the deed and be incorporated therein by reference in order to ensure protection of human health and the environment.

1. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT

A. The Grantee is hereby informed and does acknowledge that friable and non-friable asbestos or asbestos containing material "ACM" has been found on the Property. The Property may also contain improvements, such as buildings, facilities, equipment, and pipelines, above and below the ground, that contain friable and non-friable asbestos or ACM. The Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency have determined that unprotected or unregulated exposure to airborne asbestos fibers increases the risk of asbestos-related diseases, including certain cancers that can result in disability or death.

B. The following building(s) on the Property has (have) been determined to contain friable asbestos: Administration Building. The Grantee agrees to undertake any and all asbestos abatement or remediation in the aforementioned buildings that may be required under applicable law or regulation at no expense to the Grantor. The Grantor has agreed to transfer said buildings to the Grantee, prior to remediation or abatement of asbestos hazards, in reliance upon the Grantee's express representation and covenant to perform the required asbestos abatement or remediation of these buildings.

C. The Grantee covenants and agrees that its use and occupancy of the Property will be in compliance with all applicable laws relating to asbestos. The Grantee agrees to be responsible for any future remediation or abatement of asbestos found to be necessary on the Property to include ACM in or on buried pipelines that may be required under applicable law or regulation.

D. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its asbestos and ACM condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos or ACM hazards or concerns.

2. NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP) AND COVENANT AGAINST THE USE OF THE PROPERTY FOR RESIDENTIAL PURPOSE

A. The Grantee is hereby informed and does acknowledge that all buildings on the Property, which were constructed or rehabilitated prior to 1978, are presumed to contain lead-based paint.

Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built prior to 1978 is notified that there is a risk of exposure to lead from lead-based paint that may place young children at risk of developing lead poisoning.

B. The Grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Property, as defined under 24 Code of Federal Regulations Part 35, without complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards. Prior to permitting the occupancy of the Property where its use subsequent to sale is intended for residential habitation, the Grantee specifically agrees to perform, at its sole expense, the Army's abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential Lead-Based Paint Hazard Reduction Act of 1992).

C. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its lead-based paint content and condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any lead-based paint hazards or concerns.

3. PESTICIDE NOTIFICATION AND COVENANT

A. The Grantee is hereby notified and acknowledges that registered pesticides have been applied to the property conveyed herein and may continue to be present thereon. The Grantee further acknowledges that where a pesticide was applied by the Grantor or at the Grantor's direction, the pesticide was applied in accordance with its intended purpose and consistently with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)(7 U.S.C. § 136, et seq.) and other applicable laws and regulations.

B. The Grantee covenants and agrees that if the Grantee takes any action with regard to the property, including demolition of structures or any disturbance or removal of soil that may expose, or cause a release of, a threatened release of, or an exposure to, any such pesticide, Grantee assumes all responsibility and liability therefore.

ENCLOSURE 7

RADIOLOGICAL MEMO



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

DAIM-ODB

18 June 2012

MEMORANDUM FOR RECORD

SUBJECT: Results from the Radiological Survey at the James W. Reese 1 U.S. Army Reserve Center (USARC) in Chester, Pennsylvania

1. On 15 June 2012, the final survey work for the radiological release at the James W. Reese 1 USARC was completed in compliance with the accepted federal government protocol (MARSSIM Class 3). The enclosed Radiological Survey Report provides an evaluation of radiological materials used and the summary of findings and results. The report concludes that no further action is required with respect to the radioactive devices or materials identified. The site is free of radiological concerns.
2. The point of contact for questions or comments is Mr. Hans Honerlah, Health Physicist, U.S. Army Corps of Engineers, Baltimore District, 410-962-4400, electronic mail hans.b.honerlah@usace.army.mil.

Encl

A handwritten signature in black ink, appearing to read "Thomas E. Lederle".

Thomas E. Lederle
Deputy Chief, ACSIM
BRAC Division

ENCLOSURE 8

ASBESTOS VISUAL INSPECTION REPORT

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ASBESTOS INSPECTION REPORT



**99TH REGIONAL SUPPORT COMMAND
UNITED STATES ARMY RESERVE
FORT DIX, NEW JERSEY**

JAMES REESE
US ARMY RESERVE CENTER
CHESTER, PENNSYLVANIA

(USAR FACID: PA015 - SITE CODE: 42830)

July 2012

ASBESTOS INSPECTION REPORT



**JAMES REESE US ARMY RESERVE CENTER
(PA015) - (42830)
500 W. 24TH STREET
CHESTER, PENNSYLVANIA**

Submitted By



Small Business Group, Inc.
10179 Highway 78
Ladson, South Carolina 29456

Submitted to



United States Army Corps of Engineers
Savannah District

Prepared for



99TH REGIONAL SUPPORT COMMAND
UNITED STATES ARMY RESERVE
FORT DIX, NEW JERSEY

US ARMY RESERVE CENTER – CHESTER (PA015)
ASBESTOS INSPECTION REPORT

EXECUTIVE SUMMARY

1. **INTRODUCTION**

An asbestos Building Inspector from the Small Business Group, Inc (SBG) of Charleston, SC conducted an inspection to identify asbestos containing material (ACM) at the James Reese US Army Reserve Center located at 500 W. 24th Street in Chester, Pennsylvania. The inspections were conducted on 13 July 2012 and the results of the inspections provide an inventory of ACM in two (2) buildings.

The inspector was certified by an EPA accredited training center under the Asbestos Hazard Emergency Response Act (AHERA), as Building Inspector and is licensed in the State of Pennsylvania. A copy of the inspector's license is located in this report.

Suspect ACM was identified and sampled in accordance with AHERA-style guidelines (See Paragraph 5 for sampling strategy). Some materials suspected of being ACM may have been assumed to be ACM and not sampled. Assumed materials included 9" floor tiles with its underlying mastic and inaccessible roofing felt paper.

Bulk samples were analyzed by the Environmental Hazards Services (EHS) laboratory of Richmond, Virginia. EHS is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) and the American Industrial Hygiene Association (AIHA) for asbestos analysis. Polarized Light Microscopy (PLM) was used to analyze samples.

Materials identified as ACM and either sampled or assumed were designated a homogeneous area by similarity of color, texture and date of application. Each homogeneous area was assigned a number and assessed in accordance with AHERA guidelines.

2. **FINDINGS SUMMARY**

BUILDING 1 (Main Administrative Building): Confirmed non-friable ACM in the form of floor tiles, floor tile mastics and door caulking. Assumed ACM in the form of friable piping and fitting thermal system insulation (TSI), and non-friable floor tiles/mastics and a vault door are located in the building.

BUILDING 2 (Maintenance Shop/Storage): No confirmed or assumed ACM is located in this building.

US ARMY RESERVE CENTER – CHESTER (PA015)

ASBESTOS INSPECTION REPORT

See attached Asbestos Summary Table and Building Summary for detailed information on these materials. Buildings containing asbestos are required to be included in an Operations and Maintenance (O&M) Program. Any identified asbestos containing material not removed must be maintained following the guidelines of an O&M Plan.

3. **RENOVATION/DEMOLITION**

The National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61 requires written notification to the state and/or local environmental regulators at least ten working days prior to renovation or demolition of ACM in quantities of 260 linear feet, 160 square feet, 35 cubic feet, or greater, except in cases of emergencies.

Contractors are advised to verify most current regulations with the state and/or local environmental regulators prior to start of any work. Quantities listed in this report are approximate and should be verified prior to any abatement activities.

4. **REPORT ORGANIZATION**

Specific, detailed information on each inspected building is noted in the *BUILDING SUMMARIES* of this report and include the following:

- Narrative description of the building with findings and recommendations
- Photos of homogeneous areas and existing buildings
- CADD drawing showing asbestos and sample locations
- Chain of Custody and laboratory results forms

5. **SAMPLING STRATEGY**

The sampling and analysis of bulk samples was conducted in accordance with established AHERA guidelines. Unless otherwise stated, the following sampling scheme was utilized during the survey:

Thermal System Insulation (TSI)

- 1) A minimum of 1 sample was taken of each homogenous area <6 linear feet (LF) or <6 square feet (SF).
- 2) A minimum of 3 samples was taken of each homogenous area >6 LF or > 6 SF.

US ARMY RESERVE CENTER – CHESTER (PA015)
ASBESTOS INSPECTION REPORT

Surfacing Materials

- 1) A minimum of 3 samples were taken of each homogeneous area of material 1000 SF or less.

- 2) A minimum of 5 samples were taken of each homogenous area of material greater than 1000 SF but less than 5000 SF.

- 3) A minimum of 7 samples were taken of each homogenous area of material greater than 5000 SF.

Miscellaneous Materials (Including floor tiles, ceiling tiles, caulking and mastics)

A minimum of 2 samples

6. **DISCLAIMER**

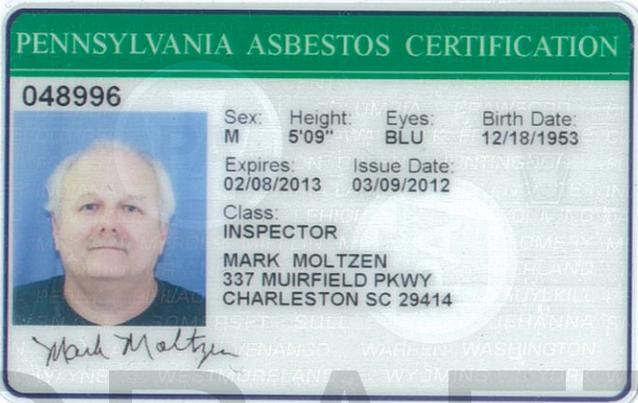
A comprehensive and thorough asbestos inspection was conducted on these facilities by a certified and experienced SBG asbestos inspector. Every effort was made to identify all ACM in the facility, but due to random sampling techniques mandated by EPA regulations and the non-destructive sampling policy for this project, the possibility always exists that some ACM remains undetected behind walls, above ceilings and in pipe chases, etc.

ASBESTOS MATERIAL SUMMARY TABLE

Building 1 - Main Reserve Center

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
1	12" black floor tile w/white streaks & mastic	NF	1,470 SF	Good	High	Rooms 102, 104, 114, 116, Entry E-001, & Halls H-100, H-101, H-102 & H-103	Confirmed ACM
2	12" gray floor tile w/white streaks & mastic	NF	1,470 SF	Good	High	Rooms 102, 104, 114, 116, Entry E-001, & Halls H-100, H-101, H-102 & H-103	Confirmed ACM
8	Gray door caulking	NF	1,150 LF	Good	Moderate	Around all interior doors	Confirmed ACM
11	Vault door	NF	1 each	Good	Low	Room 115	Assumed ACM
13	Aircell piping insulation	F	500 LF	Damaged (5%)	Low	Rooms 105, 107 and in pipe chases	Assumed ACM
17	Mudded fitting insulation	F	40 SF (40 ftgs)	Good	Low	Rooms 105, 107 and in pipe chases	Assumed ACM
19	Mastic under 12" white floor tile	NF	224 SF	Good	Low	Room 115	Confirmed ACM
21	9" black floor tile & mastic	NF	3,050	Good	Low	Under top layer of floor tile in Rooms 200, 201, 202, 203, 204, 205, 206, 207, 209, 210, 214, 215, Hall H-200 & Stairwell S-002	Assumed ACM (In checkerboard pattern w/H-22 or H-23 tile)
22	9" tan floor tile & mastic	NF	3,220 SF	Good	Low	Under top layer of floor tile in Rooms 200, 201, 202, 203, 204, 206, 209, 210, 214, 215, Halls H-200, and Stairwell S-002	Assumed ACM (In checkerboard pattern w/H-21 tile)
23	9" white floor tile wwhite streaks & mastic	NF	75 SF	Good	Low	Room 207	Assumed ACM (In checkerboard pattern w/H-21 tile)

STATE ASBESTOS INSPECTOR LICENSE



US ARMY RESERVE CENTER – CHESTER (PA015)
ASBESTOS INSPECTION REPORT

BUILDING SUMMARIES

The following pages report observations noted and suggest actions required as a result of an asbestos inspection conducted by SBG in July of 2012. Two (2) buildings at the US Army Reserve Center located in Chester, PA were inspected for possible presence of suspect/assumed asbestos. This section provides *Description, Findings, Observations, Recommended Abatement Action, and Recommendations for Operations and Maintenance* for each building inspected.

The room numbers shown on the CADD drawings and referenced in this report were taken from the posted room numbers or assigned by the inspectors at the time of inspection if no room numbers were assigned or displayed.

Some room numbers are prefixed by a letter to indicate the type of room; **E** indicates an entry to the building, **H** indicates a hallway, **R** indicates a roof, **S** indicates a stairwell, **A** is an attic area and **B** indicates basement rooms.

ASBESTOS BUILDING SUMMARY



BUILDING 1 – MAIN ADMINISTRATIVE BUILDING

DRAFT

**JAMES REESE
US ARMY RESERVE CENTER
CHESTER, PENNSYLVANIA
(USAR FACID: PA015 - SITE CODE: 42830)**

July 2012

REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT

BUILDING 1: Main Administrative Building

1. DESCRIPTION:

Building 1 is an approximately 25,700 square foot (SF) concrete block structure with a brick exterior constructed in 1958. It has metal roofing and is constructed on a concrete slab. The following information was identified during the inspection and from the analysis of samples taken:

- Twenty-four suspect homogeneous areas were identified during the inspection and sampled to confirm or assumed.
- Six homogeneous areas were assumed to contain asbestos.
- Four of the sampled suspected homogeneous areas was confirmed to contain asbestos.
- Fourteen of the suspected homogenous areas did not contain asbestos.

2. FINDINGS:

Eighteen suspect homogeneous areas were sampled. A total of thirty-nine samples were obtained from the suspect materials. All samples were analyzed by a NVLAP certified laboratory utilizing Polarized Light Microscopy (PLM) analysis. Laboratory sample analysis reports are attached to this report. See attached drawing for asbestos sample locations.

Confirmed ACM. The following homogeneous area was confirmed to contain asbestos:

- **H-1:** MISC., 12” black floor tile with white streaks & mastic is non-friable ACM in good condition with high a potential for disturbance. (In checkerboard pattern wit H-2 tile) (Approx 1,470 SF)
- **H-2:** MISC., 12” gray floor tile with white & gray streaks & mastic is non-friable ACM in good condition with a high potential for disturbance. (In checkerboard pattern wit H-1 tile) (Approx 1,470 SF)
- **H-8:** MISC., Gray door caulking is non-friable ACM in good condition with a moderate potential for disturbance. (Approx 1150 LF)
- **H-19:** MISC, Black mastic under 12” white floor tile is non-friable ACM in good condition with a low potential for disturbance. (Approx 224 SF)

REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT

Assumed ACM. The following homogeneous areas were assumed to contain asbestos:

- **H-11:** MISC., Vault door is non-friable assumed ACM in good condition with a low potential for disturbance. (1 each)
- **H-13:** TSI, Aircell piping insulation is damaged friable assumed ACM with low potential for disturbance. (Approx 500 LF)
- **H-17:** TSI, Gray mudded fitting insulation is friable assumed ACM in good condition with low potential for disturbance. (Approx 40 SF)
- **H-21:** MISC, 9" black floor tile & mastic is non-friable assumed ACM in good condition with low potential for disturbance. (Approx 3,050 SF)
- **H-22:** MISC, 9" tan floor tile & mastic is non-friable assumed ACM in good condition with low potential for disturbance. (Approx 3,220 SF)
- **H-23:** MISC, 9" white floor tile with white streaks & mastic is non-friable assumed ACM in good condition with low potential for disturbance. (Approx 75 SF)

Non-Asbestos Materials. Asbestos was not detected in the following homogeneous areas:

- H-3: MISC, Black coving & mastic
- H-4: MISC, Tan carpet mastic
- H-5: MISC, Brown window/door caulking
- H-6: MISC, Sheetrock/joint compound
- H-7: MISC, Salmon pink coving & mastic
- H-9: MISC, Blue coving & mastic
- H-10: MISC, Dark brown coving & mastic
- H-12: MISC, 12" blue marbled/mastic
- H-14: MISC, 12" beige floor tile/mastic
- H-15: MISC, Ceiling tiles w/grooves & pinholes
- H-16: MISC, Textured gypsum board ceiling tiles
- H-18: SURF, Plaster (Approx 650 SF)
- H-19: MISC, 12" White floor tile (Mastic is ACM, tile is not)
- H-20: MISC, Blue coving & mastic
- H-24: MISC, White roof caulking

REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT

3. OBSERVATIONS:

The noted quantities for TSI (H-13 & H-17) include estimated quantities that are inaccessible behind walls, ceilings and in the pipe trenches that are typical for this type of reserve center building. The floor tile mastic (H-19) in Room 115 appears to be residue from an earlier abatement. If previously unidentified suspect materials are found during renovation/demolition activities, samples must be taken to verify asbestos content prior to disturbance. Listed quantities are approximate and should be verified by contractor prior to removal/disturbance.

4. RECOMMENDED ABATEMENT ACTIONS:

Recommended actions for the following homogeneous areas:

- **H-1:** MISC, 12" black floor tile & mastic: **O&M**
- **H-2:** MISC, 12" gray floor tile & mastic: **O&M**
- **H-8:** MISC, Gray door caulking: **O&M**
- **H-11:** MISC, Vault door: **O&M**
- **H-13:** TSI, Aircell piping insulation: **O&M/Remove**
- **H-17:** TSI, Gray mudded fitting insulation: **O&M/Remove**
- **H-19:** MISC, Black mastic under 12" white floor tile: **O&M**
- **H-21:** MISC, 9" black floor tile & mastic: **O&M**
- **H-22:** MISC, 9" tan floor tile & mastic: **O&M**
- **H-23:** MISC, 9" white floor tile & mastic: **O&M**

5. RECOMMENDATIONS FOR OPERATIONS & MAINTENANCE:

Operations and Maintenance recommendations for confirmed and assumed homogeneous areas of ACM should be maintained in an Operations & Maintenance Plan. The materials listed below should be maintained following the guidelines in an O & M Plan during regular maintenance and small-scale repair activities, until removed.

See ACM Summary Table in Executive Summary for exact locations.

**REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT**

6. HOMOGENEOUS AREAS PHOTOGRAPHS:

	
<p>H-1 12" black marbled floor tile/mastic (ACM)</p>	<p>H-2 12" gray marbled floor tile/mastic (ACM)</p>
	
<p>H-3 Black coving/mastic (Non-ACM)</p>	<p>H-4 Tan carpet mastic (Non-ACM)</p>
	
<p>H-5 Brown caulking (Non-ACM)</p>	<p>H-6 Sheetrock/joint compound (Non-ACM)</p>

**REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT**

6. HOMOGENEOUS AREAS PHOTOGRAPHS (Cont.):



H-7 Salmon pink coving/mastic
(Non-ACM)



H-8 Gray door caulking (ACM)



H-9 Blue coving/mastic (Non-ACM)



H-10 Brown coving/mastic (Non-ACM)



H-11 Vault door (Assumed ACM)



H-12 12" blue marbled floor tile/mastic
(Non-ACM)

**REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT**

6. HOMOGENEOUS AREAS PHOTOGRAPHS (Cont.):



H-13 Aircell piping TSI
(Assumed ACM)



H-14 12" beige marbled floor tile/mastic
(Non-ACM)



H-15 Ceiling tiles (Non-ACM)



H-16 Texture gypsum ceiling tile
(Non-ACM)



H-17 Mudded fitting TSI
(Assumed ACM)

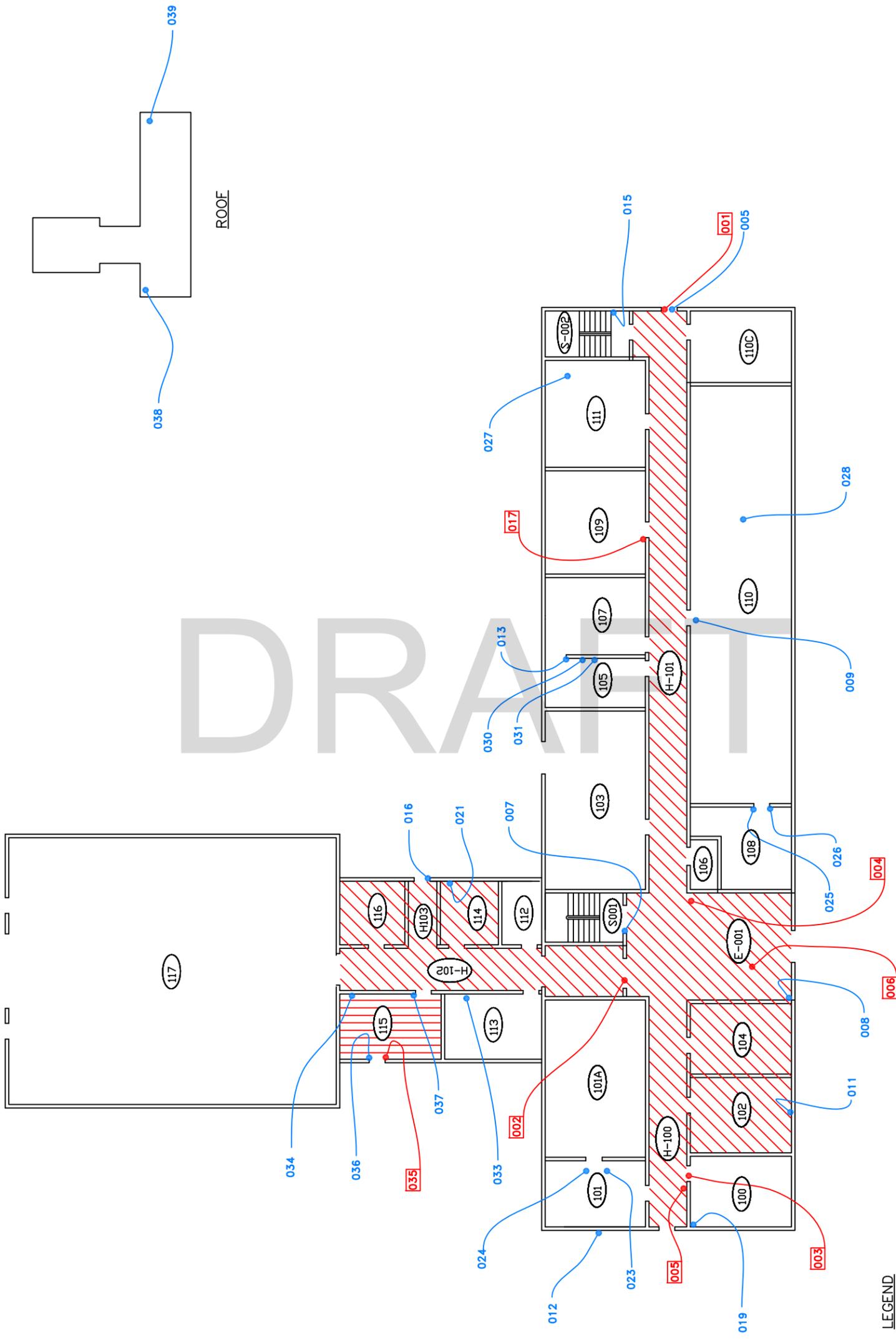


H-18 Plaster (Non-ACM)

**REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT**

6. HOMOGENEOUS AREAS PHOTOGRAPHS (Cont.):

	
<p>H-19 12" white floor tile (Non-ACM) Associated mastic (ACM)</p>	<p>H-20 Green coving/mastic (Non-ACM)</p>
	
<p>H-21 9" black floor tile/mastic H-22 9" gray floor tile/mastic (Assumed ACM)</p>	<p>H-23 9" white floor tile/mastic (ACM) (Assumed ACM)</p>
	<p>Intentionally left blank</p>
<p>H-24 White roof caulking (Non-ACM)</p>	



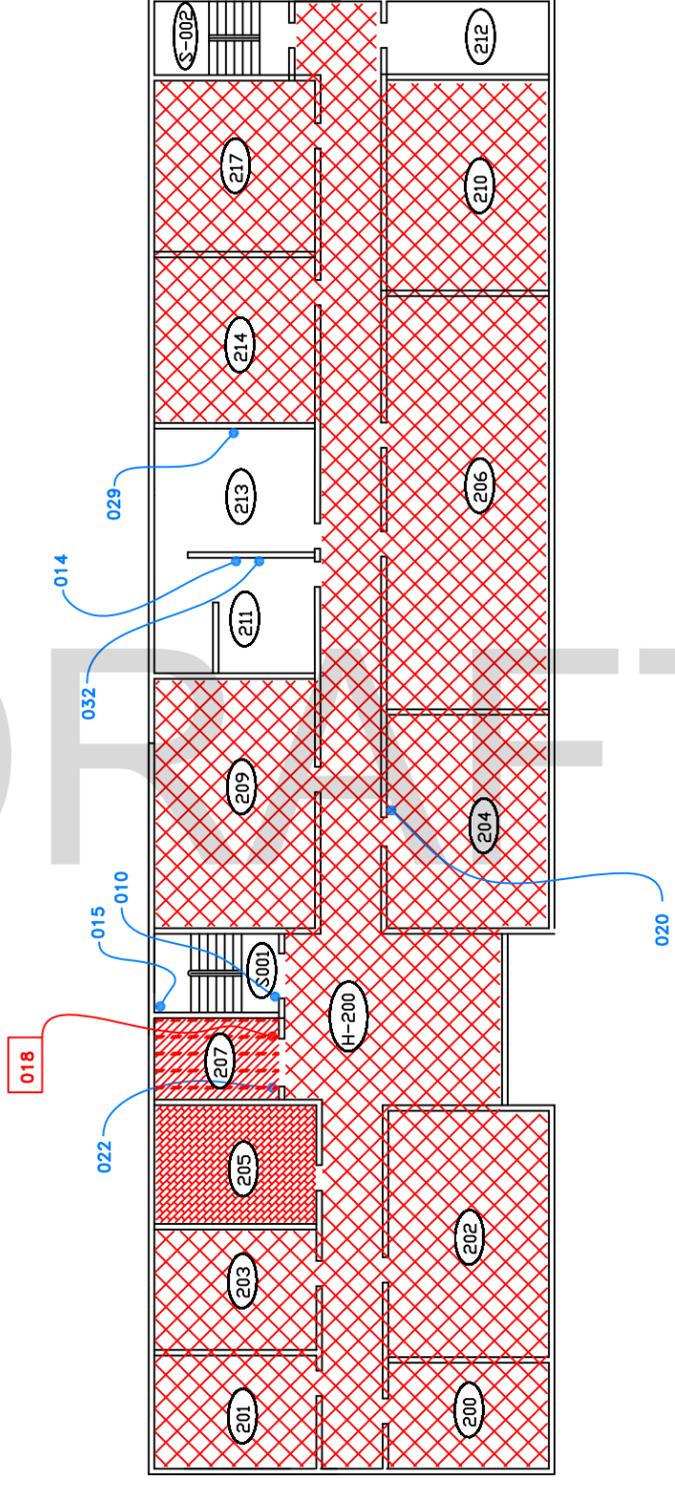
LEGEND

- (XXX) — Indicates unique room number assigned by inspector
- XXX — Indicates sample locations which tested positive for asbestos
- ▨ — ACM floor tile & mastic in checkerboard pattern (H-1 & H-2)
- ▨ — ACM floor tile mastic only (H-19)

SBG-EEG
 7301 RIVERS AVE., SUITE 245
 N. CHARLESTON SC 29406-4643
 (843) 573-7140

APPENDIX B	
ASBESTOS SAMPLE LOCATIONS	
BUILDING 1, FIRST FLOOR	
ARC REESE (PA015)	
CHESTER, PENNSYLVANIA	
DATE	PREPARED BY
AUG 2012	M. MOLTZEN
SCALE	DRAWN BY
NONE	L. C. DIASIO
DWG NUMBER	REV
SBG-PA015-B1FL1_07-2012	-
SHEET	1 OF 2

DRAFT



LEGEND

- (XXX) — Indicates unique room number assigned by inspector
- (XXX) — Indicates sample locations which tested positive for asbestos
- (Cross-hatch) — assumed ACM 9" black & tan floor tile & mastic in checkerboard pattern (H-21 & H-22)
- (Grid) — assumed ACM 9" tan floor tile & mastic (H-22)
- (Diagonal lines) — assumed ACM 9" white floor tile & mastic in checkerboard pattern (H-21 & H23)

SBG-EEG		APPENDIX B	
7301 RIVERS AVE., SUITE 245 N. CHARLESTON SC 29406-4643 (843) 573-7140		ASBESTOS SAMPLE LOCATIONS BUILDING 1, SECOND FLOOR ARC REESE (PA015) CHESTER, PENNSYLVANIA	
DATE	AUG 2012	PREPARED BY	M. MOLTZEN
SCALE	NONE	DRAWN BY	L. C. DIASIO
DWG NUMBER		SHEET	
SBG-PA015-B1FL2-07-2012		2 OF 2	



Environmental Hazards Services, L.L.C.
 7469 Whitepine Rd
 Richmond, VA 23237
 Telephone: 800.347.4010

Asbestos Bulk Analysis Report

Report Number: 12-08-00141

Client: SBG Inc.
 10179 Highway 78
 Ladson, SC 29456-370

Received Date: 08/01/2012
 Analyzed Date: 08/01/2012, 08/02/2012
 Reported Date: 08/03/2012

Project/Test Address: ARC-Chester, PA; Bldg #1

Client Number:
 42-4515

Fax Number:
 843-879-0401

Laboratory Results

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-001A	001	Mastic I	Yellow Adhesive; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous
12-08-00141-001B	001	Tile	Brown Vinyl; Homogeneous	3% Chrysotile	97% Non-Fibrous
				Total Asbestos: 3%	
12-08-00141-001C	001	Mastic II	Black Tar-Like; Homogeneous	6% Chrysotile	3% Cellulose 91% Non-Fibrous
				Total Asbestos: 6%	
12-08-00141-002A	002	Mastic I	Yellow Adhesive; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous
12-08-00141-002B	002	Tile		Did Not Analyze (Positive Stop)	
12-08-00141-002C	002	Mastic II		Did Not Analyze (Positive Stop)	

DRAFT

Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00141

Project/Test Address: ARC-Chester, PA; Bldg #1

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-003A	003	Mastic I	Yellow Adhesive; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous
12-08-00141-003B	003	Tile		Did Not Analyze (Positive Stop)	
12-08-00141-003C	003	Mastic II		Did Not Analyze (Positive Stop)	
12-08-00141-004A	004	Tile	Gray Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-004B	004	Mastic	Black Tar-Like; Homogeneous Total Asbestos: 6%	6% Chrysotile	3% Cellulose 91% Non-Fibrous
12-08-00141-005A	005	Mastic I	Yellow Adhesive; Homogeneous	NAD	4% Cellulose 96% Non-Fibrous
12-08-00141-005B	005	Tile	Gray Vinyl; Homogeneous	5% Chrysotile Total Asbestos: 5%	95% Non-Fibrous
12-08-00141-005C	005	Mastic II		Did Not Analyze (Positive Stop)	
12-08-00141-006A	006	Mastic I	Yellow Adhesive; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00141

Project/Test Address: ARC-Chester, PA; Bldg #1

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-006B	006	Tile		Did Not Analyze (Positive Stop)	
12-08-00141-006C	006	Mastic II		Did Not Analyze (Positive Stop)	
12-08-00141-007A	007	Cove Base	Black Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-007B	007	Mastic	Brown Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous
12-08-00141-008A	008	Cove Base	Black Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-008B	008	Mastic	Tan Adhesive; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-009	009		Tan Adhesive; Homogeneous	NAD	4% Cellulose 96% Non-Fibrous
12-08-00141-010	010		Tan Adhesive; Homogeneous	NAD	4% Cellulose 96% Non-Fibrous
12-08-00141-011	011		Gray Adhesive; Homogeneous	NAD	100% Non-Fibrous

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Environmental Hazards Services, L.L.C

Client Number: 42-4515
 Project/Test Address: ARC-Chester, PA; Bldg #1

Report Number: 12-08-00141

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-012	012		Gray Adhesive; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-013	013		Gray Powder; Brown Fibrous; White Granular; Inhomogeneous	NAD	20% Cellulose 80% Non-Fibrous
12-08-00141-014	014		Gray Powder; Brown Fibrous; White Granular; Inhomogeneous	NAD	20% Cellulose 80% Non-Fibrous
12-08-00141-015A	015	Cove Base	Pink Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-015B	015	Mastic	Tan Adhesive; Homogeneous	NAD	1% Cellulose 99% Non-Fibrous
12-08-00141-016A	016	Cove Base	Pink Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-016B	016	Mastic	Tan Adhesive; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-017	017		Brown Adhesive; Homogeneous	4% Chrysotile	3% Cellulose 93% Non-Fibrous
Total Asbestos:				4%	

Environmental Hazards Services, L.L.C

Client Number: 42-4515
 Project/Test Address: ARC-Chester, PA; Bldg #1

Report Number: 12-08-00141

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-018	018			Did Not Analyze (Positive Stop)	
12-08-00141-019A	019	Cove Base	Blue Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-019B	019	Mastic	Tan Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous
12-08-00141-020A	020	Cove Base	Blue Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-020B	020	Mastic	Brown Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous
12-08-00141-021A	021	Cove Base	Brown Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-021B	021	Mastic	Tan Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous
12-08-00141-022A	022	Cove Base	Brown Vinyl; Homogeneous	NAD	100% Non-Fibrous

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Environmental Hazards Services, L.L.C

Client Number: 42-4515
 Project/Test Address: ARC-Chester, PA; Bldg #1

Report Number: 12-08-00141

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-022B	022	Mastic	Tan Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous
12-08-00141-023A	023	Tile	Blue Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-023B	023	Mastic	Yellow Adhesive; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous
12-08-00141-024A	024	Tile	Blue Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-024B	024	Mastic	Yellow Adhesive; Homogeneous	NAD	1% Cellulose 99% Non-Fibrous
12-08-00141-025A	025	Tile	Beige Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-025B	025	Mastic	Black Tar-Like; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous
12-08-00141-026A	026	Tile	Beige Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-026B	026	Mastic	Black Tar-Like; Homogeneous	NAD	4% Cellulose 96% Non-Fibrous

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Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00141

Project/Test Address: ARC-Chester, PA; Bldg #1

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-027	027		Gray Fibrous; White Brittle; Inhomogeneous	NAD	60% Cellulose 10% Fibrous Glass 30% Non-Fibrous
12-08-00141-028	028		Gray Fibrous; White Brittle; Inhomogeneous	NAD	60% Cellulose 10% Fibrous Glass 30% Non-Fibrous
12-08-00141-029	029		White Powder; Brown Fibrous; Inhomogeneous	NAD	20% Cellulose 1% Fibrous Glass 79% Non-Fibrous
12-08-00141-030	030		White Powder; Brown Fibrous; Inhomogeneous	NAD	20% Cellulose 1% Fibrous Glass 79% Non-Fibrous
12-08-00141-031	031		Brown/Tan Granular; Inhomogeneous	NAD	100% Non-Fibrous
12-08-00141-032	032		Brown/Tan Granular; Inhomogeneous	NAD	100% Non-Fibrous
12-08-00141-033	033		Brown/Tan Granular; Inhomogeneous	NAD	100% Non-Fibrous
12-08-00141-034A	034	Tile	White Vinyl; Homogeneous	NAD	100% Non-Fibrous

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Environmental Hazards Services, L.L.C

Client Number: 42-4515
 Project/Test Address: ARC-Chester, PA; Bldg #1

Report Number: 12-08-00141

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-034B	034	Mastic	Yellow Adhesive; Homogeneous	NAD	4% Cellulose 96% Non-Fibrous
12-08-00141-034C	034	Leveling Comp.	Gray Granular; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-035A	035	Tile	White Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-035B	035	Mastic I	Yellow Adhesive; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous
12-08-00141-035C	035	Leveling Comp.	Gray Granular; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-035D	035	Mastic II	Black Tar-Like; Homogeneous	5% Chrysotile	3% Cellulose 92% Non-Fibrous
Total Asbestos: 5%					
12-08-00141-036A	036	Cove Base	Green Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-036B	036	Mastic	Tan/Beige Adhesive; Inhomogeneous	NAD	3% Cellulose 97% Non-Fibrous

DRAFT

Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00141

Project/Test Address: ARC-Chester, PA; Bldg #1

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00141-037A	037	Cove Base	Green Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-037B	037	Mastic	Tan/Beige Adhesive; Inhomogeneous	NAD	3% Cellulose 97% Non-Fibrous
12-08-00141-038	038		Gray Adhesive; Homogeneous	NAD	100% Non-Fibrous
12-08-00141-039	039		Gray Adhesive; Homogeneous	NAD	100% Non-Fibrous

DRAFT

Environmental Hazards Services, L.L.C

Client Number: 42-4515
Project/Test Address: ARC-Chester, PA; Bldg #1

Report Number: 12-08-00141

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
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QC Sample: 58-M22004-4, 60-NY-35-3829
QC Blank: SRM 1866 Fiberglass
Reporting Limit: 1% Asbestos
Method: EPA Method 600/R-93/116, EPA Method 600/M4-82-020
Analyst: Christian H. Schaible



Reviewed By Authorized Signatory: _____

Irma Faszewski
QA/QC Manager

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Each distinct component in an inhomogeneous sample was analyzed separately and reported as a composite. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. This report cannot be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. California Certification #2319 NY ELAP #11714. All information concerning sampling location, date, and time can be found on Chain-of-Custody. Environmental Hazards Services, L.L.C. does not perform any sample collection.

Environmental Hazards Services, L.L.C. recommends reanalysis by point count (for more accurate quantification) or Transmission Electron Microscopy (TEM), (for enhanced detection capabilities) for materials regulated by EPA NESHAP (National Emission Standards for Hazardous Air Pollutants) and found to contain less than ten percent (<10%) asbestos by polarized light microscopy (PLM). Both services are available for an additional fee.

400 Point Count Analysis, where noted, performed per EPA Method 600/R-93/116 with a Reporting Limit of 0.25%.

* All California samples analyzed by Polarized Light Microscopy, EPA Method 600/M4-82-020, Dec. 1982.

LEGEND: NAD = no asbestos detected

39 AM

AS ES OS CHAIN OF CUSTODY FORM



FACILITY: ARC - Chester, PA BLDG #: 1

INSPECTOR'S NAME(S): Mark Moltzen DATE: 7/13/12
(PRINT)

TOTAL NUMBER OF SAMPLES RELINQUISHED 39

Sample #s:	Relinquished by / Date:	Received by / Date:
<u>ARC-Chester-001 thru 039</u>	<u>MA Moltzen 7/30/12</u>	

ANALYSIS REQUIRED

DRAFT

Bulk ID by PLM

Asbestos Wipe

Fiber Count (PCM)

TEM Chatfield (Bulk)

TEM Air

Other (specify) _____

Additional Information / Comments

Positive Stop!

~~No TEMs - PA samples~~

12-08-00141



Due Date:
08/06/2012
(Monday)
AE

PHS

Notification of Results

Name: Mark Moltzen Phone: 843.879.0440 E-Mail: moltzen@sbg-eeg.com

SBG Job #: 1241

SBG, INC
10179 Hwy 78
Ladson, SC 29456
(843) 879-0400

FAX (843) 879-0401

* Sample Number From bags. (45) J Storm

8-1-12

ASBESTOS SAMPLE LOG



FACILITY: ARC – Chester, PA BLDG #: 1

INSPECTOR NAME(S): Mark A. Moltzen DATE: 7/13/12

INSPECTOR SIGNATURE(S): Mark A. Moltzen
(SIGNATURE)

SAMPLE NUMBER	HOMO #	SAMPLE LOCATION (Room #, Floor #, Etc.)	SAMPLE DESCRIPTION
ARC-CHESTER-001	1	Hall H-101	12" Black with white streaks / mastic
ARC-CHESTER-002	1	Hall H-102	12" Black with white streaks / mastic
ARC-CHESTER-003	1	Hall H-100	12" Black with white streaks / mastic
ARC-CHESTER-004	2	Entry E-001	12" gray ft with white streaks /mastic
ARC-CHESTER-005	2	H-100	12" gray ft with white streaks /mastic
ARC-CHESTER-006	2	E-001	12" gray ft with white streaks /mastic
ARC-CHESTER-007	3	Stairwell S-001	Black Coving
ARC-CHESTER-008	3	E-001	Black Coving
ARC-CHESTER-009	4	Room 110	Tan Carpet Mastic
ARC-CHESTER-010	4	S-001	Tan Carpet Mastic
ARC-CHESTER-011	5	Room 102	Brown Caulking
ARC-CHESTER-012	5	Ext window	Brown Caulking

ASBESTOS SAMPLE LOG



FACILITY: ARC – Chester, PA BLDG #: 1

INSPECTOR NAME(S): Mark A. Moltzen DATE: 7/13/12
(PRINT)

INSPECTOR SIGNATURE(S): *Mark A. Moltzen*
(SIGNATURE)

SAMPLE NUMBER	HOMO #	SAMPLE LOCATION (Room #, Floor #, Etc.)	SAMPLE DESCRIPTION
ARC-CHESTER-013	6	Room 105	Sheetrock /mud
ARC-CHESTER-014	6	Room 211	Sheetrock /mud
ARC-CHESTER-015	7	Stairwell S-002	Salmon Coving
ARC-CHESTER-016	7	Hall H-103	Salmon Coving
ARC-CHESTER-017	8	Room 109	Gray caulking
ARC-CHESTER-018	8	Room 207	Gray caulking
ARC-CHESTER-019	9	Room 100	Blue coving
ARC-CHESTER-020	9	Room 204	Blue coving
ARC-CHESTER-021	10	Room 114	DK Brown Coving/Mastic
ARC-CHESTER-022	10	Room 207	DK Brown Coving/Mastic
ARC-CHESTER-023	12	Room 101	12" Blue marbled ft/mastic
ARC-CHESTER-024	12	Room 101	12" Blue marbled ft/mastic

ASBESTOS SAMPLE LOG



FACILITY: ARC Chester, PA BLDG #: 1

INSPECTOR NAME(S): Mark A. Moltzen DATE: 7/13/12
(PRINT)

INSPECTOR SIGNATURE(S): *Mark A. Moltzen*
(SIGNATURE)

SAMPLE NUMBER	HOMO #	SAMPLE LOCATION (Room #, Floor #, Etc.)	SAMPLE DESCRIPTION
ARC-CHESTER-025	14	Room 108	12" beige with tan marbling/mastic
ARC-CHESTER-026	14	Room 108	12" beige with tan marbling/mastic
ARC-CHESTER-027	15	Room 111	Ceiling tile
ARC-CHESTER-028	15	Room 110	Ceiling tile
ARC-CHESTER-029	16	Room 213	Sheet rock panels
ARC-CHESTER-030	16	Room 105	Sheet rock panels
ARC-CHESTER-031	18	Room 105	Plaster
ARC-CHESTER-032	18	Room 211	Plaster
ARC-CHESTER-033	18	Room 113	Plaster
ARC-CHESTER-034	19	Room 115	12" white with green specks ft /mastic
ARC-CHESTER-035	19	Room 115	12" white with green specks ft /mastic
ARC-CHESTER-036	20	Room 115	Green coving /mastic

ASBESTOS BUILDING SUMMARY



BUILDING 2 – MAINTENANCE SHOP BUILDING

**JAMES REESE
US ARMY RESERVE CENTER
CHESTER, PENNSYLVANIA
(USAR FACID: PA015 - SITE CODE: 42830)**

July 2012

REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT

BUILDING 2: Maintenance Shop

1. DESCRIPTION:

Building 2 is a 5380 square-foot building constructed in 1958. It is a concrete block structure with brick exterior and a flat, metal roof. The following information was identified during the survey and from the analysis of the samples taken:

- Three homogeneous areas were identified during the initial survey.
- No homogeneous areas were assumed to contain asbestos.
- The three suspected homogeneous areas (H-5, H-6 & H-24) are the same as found and sampled in Building 1.
- These suspected homogeneous areas were confirmed to be non-asbestos containing materials.

2. FINDINGS:

Three homogeneous areas with suspected ACM were identified. Since they are the same homogeneous materials tested in Building 1, and were not sampled in this building. Asbestos was not found in any homogeneous areas.

Confirmed ACM. The following homogeneous areas sampled were confirmed to contain asbestos: **NONE**

Asbestos Free. Asbestos was not detected in the following homogeneous areas:

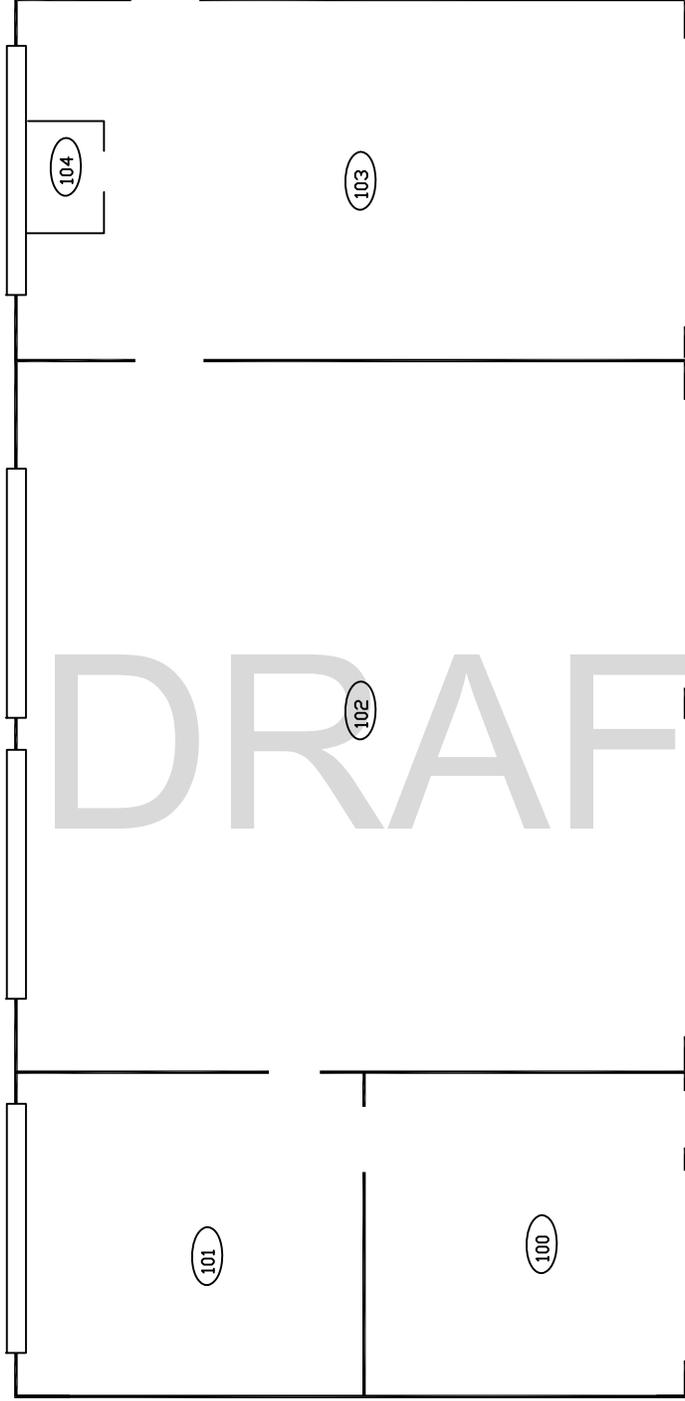
- H-5: MISC, Brown window/door caulking
- H-6: MISC, Sheetrock/joint compound
- H-24: MISC, White roofing caulk

Assumed ACM. The following homogeneous areas were assumed to contain asbestos: **NONE**

3. OBSERVATIONS: NONE

4. RECOMMENDED ABATEMENT ACTIONS: NONE

5. RECOMMENDATIONS FOR OPERATIONS AND MAINTENANCE: NONE



ROOF

LEGEND

(XXX) — Indicates unique room number assigned by inspector

SBG-EEG
 7301 RIVERS AVE., SUITE 245
 N. CHARLESTON SC 29406-4643
 (843) 573-7140

APPENDIX B
 ASBESTOS SAMPLE LOCATIONS
 BUILDING 2
 ARC REESE (PA015)
 CHESTER, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
AUG 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER	SHEET	
NONE	SBG_PA015-B2_07-2012	1 OF 1	

ASBESTOS BUILDING SUMMARY



BUILDING 3 – STORAGE BUILDING

**JAMES REESE
US ARMY RESERVE CENTER
CHESTER, PENNSYLVANIA
(USAR FACID: PA015 - SITE CODE: 42830)**

July 2012

REESE US ARMY RESERVE CENTER – CHESTER, PA
ASBESTOS INSPECTION REPORT

BUILDING 3: Storage Building

1. DESCRIPTION:

Building 3 is a 2,890 square-foot building constructed in the 2000s. It is a metal-framed structure with metal siding and roofing. **Inspection of this building revealed no suspected asbestos containing materials.** The following information was identified during the survey:

- No suspect homogeneous areas were identified during the initial survey.
- No homogeneous areas were assumed to contain asbestos.

2. FINDINGS:

No homogeneous areas with suspected ACM were identified. No samples were collected or analyzed.

3. OBSERVATIONS: NO SUSPECT MATERIALS FOUND

4. RECOMMENDED ABATEMENT ACTIONS: NONE

5. RECOMMENDATIONS FOR OPERATIONS AND MAINTENANCE: NONE

ENCLOSURE 9

REGULATORY/PUBLIC COMMENTS & ARMY RESPONSE

Will be updated after public comments are received.

- The Notice of Availability was placed in the [name of Paper] and the Draft FOST was placed at the _____ Library in City, State from _____ to _____ (see attached [attached affidavit and actual NOA from paper below). No public comments were received during the review period.
- The Draft FOST was sent to PADEP on DATE. PADEP response.
- The Draft FOST was sent to US EPA Region 3 on _____. EPA response____
- Army response_____

DRAFT