

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

**Germantown Veterans Memorial U.S. Army Reserve Center (PA076)
5200 Wissahickon Avenue
Philadelphia, Pennsylvania 19144**

September 2012

**FINDING OF SUITABILITY TO TRANSFER
(FOST)
Germantown Veterans Memorial USAR Center (PA076)
Philadelphia, Pennsylvania**

September 2012

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of property at the Germantown Veterans Memorial United States Army Reserve (USAR) Center, located in Philadelphia, Pennsylvania, for transfer to the Philadelphia City Planning Commission 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 Access Provision 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 approximately 4.94 acres, which includes two permanent buildings: an Administration Building and Organizational Maintenance Shop (OMS). The property was previously used for administrative, training and logistical purposes and vehicle and equipment maintenance. The property is intended to be transferred for police covert and undercover operations and is consistent with the intended reuse of the property as set forth in the Philadelphia City Planning Commission'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 finalized in May 2012. The information provided is a result of a search of agency files during the development of these environmental surveys.

A 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 2: Germantown Veterans Memorial USAR Center (PA076); entire parcel including all building structures.

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

4.1. Environmental Investigation Sites

The following investigation sites are located on the property: 1) In 1995, light nonaqueous phase liquid (LNAPL) was identified in two monitoring wells on site. The LNAPL leaked from a 1,500-gallon No. 2 fuel oil UST and a 12,000-gallon UST that were removed in 1992. Cleanup activities included collecting groundwater and subsurface soil samples to characterize the nature and extent of contamination and removing soil contaminated with No. 2 fuel oil. LNAPL also was recovered from two of the onsite monitoring wells. A remedial action completion report was submitted to the Pennsylvania Department of Environmental Protection (PADEP) in April 2002, at the completion of remedial activities. PADEP issued a no further action (NFA) letter to the Department of the Army on August 1, 2002. Refer to Section 3.3 of the 2007 ECP Report for additional information.

All environmental soil and/or groundwater investigation activities on the property have been completed.

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 40 CFR Part 373 reportable quantities. Refer to Section 3.3 of the 2007 ECP Report for additional information. See Table 2 – Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 4).

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 UST/AST sites at the Property.
- **Former UST/AST Sites** – There were three USTs and one AST that have been removed from the Property: The AST contained No. 2 fuel oil and was removed from the property sometime after 1996. There is no evidence of a petroleum release from this AST site. Two USTs; a 1,500 gallon and 12,000 gallon tank, containing No. 2 fuel oil, were removed from the ground in 1992. Remedial activities were conducted to clean up releases from these USTs, and an NFA letter was received from PADEP in 2002. See Section 4.1 Environmental Investigation Sites for additional information. A third 2,500-gallon UST containing No. 2 fuel oil was removed on January 27, 2003. There is evidence of a petroleum release from the 2,500-gallon UST site.

See Section 3.3 of the 2007 ECP Report for additional information. A summary of the UST/AST petroleum product activities is provided in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 5).

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.

A summary of the UST/AST petroleum product activities is provided in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 5).

4.4. Polychlorinated Biphenyls (PCB)

The following electrical equipment is located on the property that was suspected to contain PCBs: Two pad-mounted transformers located next to the southwest corner of the Administration Building. This equipment was sampled for PCBs in 2003 and PCBs were not detected. This equipment is owned and operated by Philadelphia Energy Company (PECO) and have been determined not to be leaking.

4.5. Asbestos

There is presumed friable and non friable asbestos-containing material (ACM) in the following buildings: Administration Building and Operation Maintenance Shop. See Asbestos Visual Inspection Report, SBG Inc., 2012 for additional information.

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 7).

4.6. Lead-Based Paint (LBP) and Lead-Contaminated Dust (Lead Dust) Hazards

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.

4.7. Indoor Firing Ranges

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 (unknown date), and confirmation sampling performed in 2012 indicates lead concentrations are below 200 $\mu\text{g}/\text{ft}^2$. See Indoor Firing Range, Lead Sampling Report, SBG Inc., 2012, for additional information. The transferee does not intend to use the Administration Building (Bldg 100) as a child-occupied facility in the future. The deed will include a lead-contaminated dust warning and covenant. The deed will include a lead-based paint warning and covenant (Enclosure 7).

4.8. 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 15 June 2012, the US Army Chief of Staff for Installations BRAC Deputy concluded the site is free of radiological concerns. See Enclosure 8 for additional information.

4.9. Radon

A radon survey was conducted in 1993 at the Administration Building on the. Radon was not detected at above the EPA residential action level of 4.0 picocuries per liter (pCi/L) at the USAR Center. See Section 6.8 of the 2007 ECP Report for additional information.

4.10. 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.

4.11. 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, 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 8.

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 Record of Environmental Consideration dated August, 17, 2012. There were no encumbrances or conditions identified in the NEPA analysis as necessary to protect human health or the environment.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the above information, I conclude that all removal or remedial actions necessary to protect human health and the environment have been taken and the property is transferable under CERCLA Section 120(h). In addition, all Department of Defense requirements to reach a finding of suitability to transfer have been met, subject to the terms and conditions set forth in the attached Environmental Protection Provisions that shall be included in the deed for the property. The deed will also include an Access Provision, enabling access in the event of a latent discovery of contamination caused by prior Department of Defense operations, and Other Deed Provisions.

WILLIAM D. R. WAFF
Major General
Commanding General

Date

8 Enclosures

- Encl 1 -- Site Map of Property
- Encl 2 -- Environmental Documentation
- Encl 3 -- Table 1 -- Description of Property
- Encl 4 -- Table 2 -- Notification of Hazardous Substance Storage, Release, or Disposal
- Encl 5 -- Table 3 -- Notification of Petroleum Product Storage, Release, or Disposal
- Encl 6 -- Access Provision and Other Deed Provisions
- Encl 7-- Environmental Protection Provisions
- Encl 8 -- Radiological Memo
- Encl 9 -- Asbestos Survey
- Encl 10 -- Indoor Firing Range, Lead Sampling Report
- Encl 11 -- Regulatory/Public Comments and Army Response

ENCLOSURE 1 SITE MAP OF PROPERTY

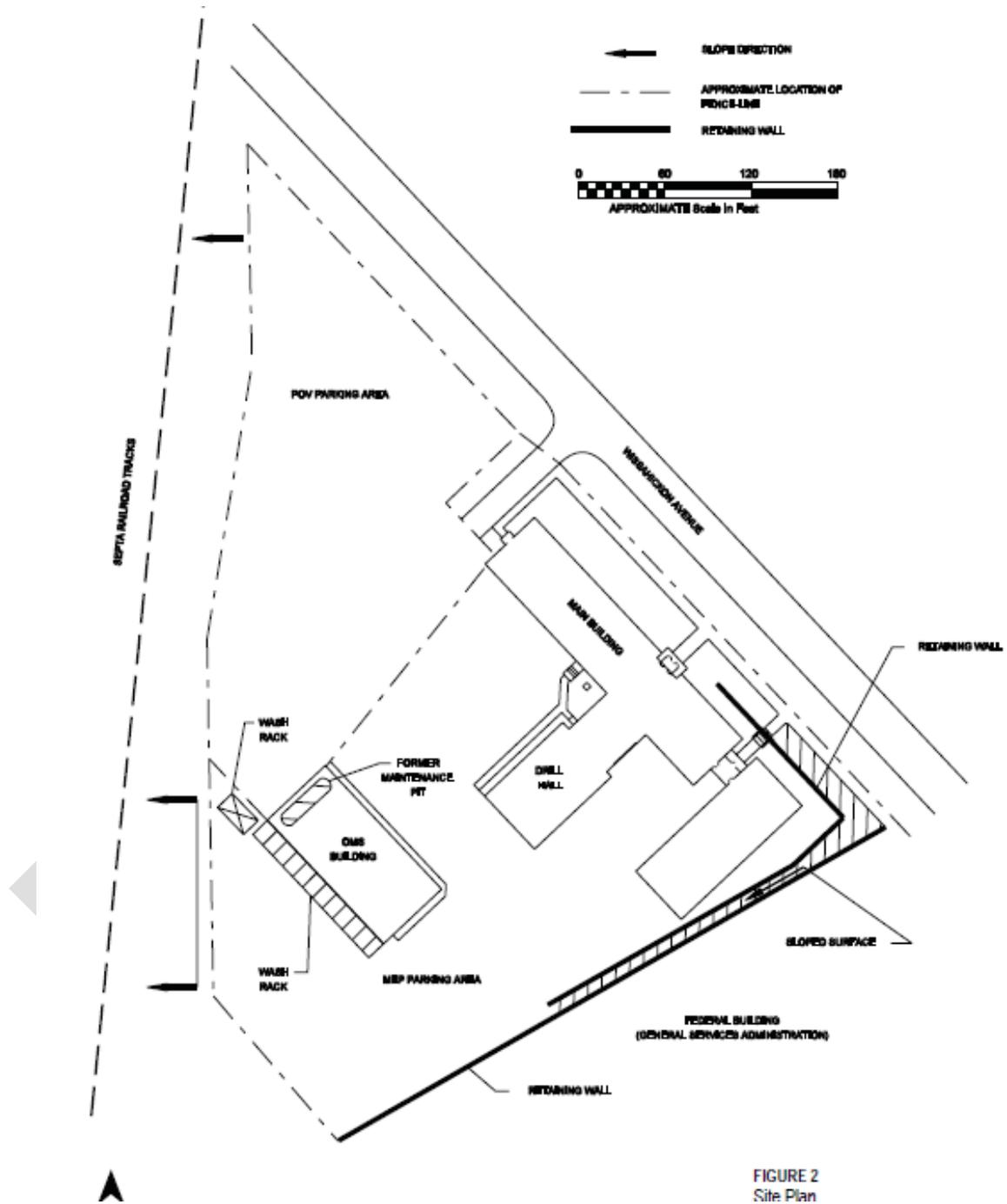


FIGURE 2
Site Plan

*Source: 2007 ECP Report

ENCLOSURE 2

ENVIRONMENTAL DOCUMENTATION

Document	Source
Environmental Condition of Property Report for Germantown Veterans Memorial U.S. Army Reserve Center (PA076), Philadelphia, Pennsylvania, prepared by CH2M Hill, February 2007	USACE
Environmental Condition of Property Update Report, Germantown Veterans Memorial U.S. Army Reserve Center (PA076), Philadelphia, Pennsylvania, prepared by XCEL Engineering, Inc., June 2012	USACE
Indoor Firing Range, Lead Sampling Report, August 2012	99th RSC
Asbestos Visual Reinspection Report, July 2012	
Record of Environmental Consideration, August 2012	99th RSC
Radiological Memo, June 2012	99th RSC

ENCLOSURE 3

TABLE 1 – DESCRIPTION OF PROPERTY

Building Number and Property Description	Condition Category	Remedial Actions
The entire Parcel, including all buildings	2	Complete. In 1995, light nonaqueous phase liquid (LNAPL) was identified in two monitoring wells on site. The LNAPL leaked from a 1,500-gallon No. 2 fuel oil UST and a 12,000-gallon UST that were removed in 1992. Cleanup activities included collecting groundwater and subsurface soil samples to characterize the nature and extent of contamination and removing soil contaminated with No. 2 fuel oil. LNAPL also was recovered from two of the onsite monitoring wells. A remedial action completion report was submitted to the Pennsylvania Department of Environmental Protection (PADEP) in April 2002, at the completion of remedial activities. PADEP issued a no further action (NFA) letter to the Department of the Army on August 1, 2002. Refer to Section 3.3 of the 2007 ECP 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 HAZARDOUS SUBSTANCE STORAGE, RELEASE, OR DISPOSAL

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
The entire Parcel including all buildings.	No hazardous substances were stored, released or disposed of on the property in excess of 40 CFR Part 373 reportable quantities.	1957 to Present.	None required. Actions required for petroleum products are described in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 5).
<p>* The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or ‘Superfund’) 42 U.S.C. §9620(h). This table provides information on the storage of hazardous substances for one year or more in quantities greater than or equal to 1,000 kilograms or the hazardous substance’s CERCLA reportable quantity (which ever is greater). In addition, it provides information on the known release of hazardous substances in quantities greater than or equal to the substances CERCLA reportable quantity. See 40 CFR Part 373.</p>			

ENCLOSURE 5

TABLE 3 – NOTIFICATION OF PETROLEUM PRODUCT STORAGE, RELEASE, OR DISPOSAL

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
USAR Center	No. 2 Fuel oil	1957 to 1995	<p>Complete. In 1995, light nonaqueous phase liquid (LNAPL) was identified in two monitoring wells on site. The LNAPL leaked from a 1,500-gallon No. 2 fuel oil UST and a 12,000-gallon UST that were removed in 1992. Cleanup activities included collecting groundwater and subsurface soil samples to characterize the nature and extent of contamination and removing soil contaminated with No. 2 fuel oil. LNAPL also was recovered from two of the onsite monitoring wells. A remedial action completion report was submitted to the Pennsylvania Department of Environmental Protection (PADEP) in April 2002, at the completion of remedial activities. PADEP issued a no further action (NFA) letter to the Department of the Army on August 1, 2002. Refer to Section 3.3 of the 2007 ECP Report for additional information.</p>

ENCLOSURE 6

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

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

I. Access Rights:

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 7, 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 7

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 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 buildings on the Property have been determined or are suspected to contain friable asbestos: Administration Building and OMS. 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 those 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 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. Notice and Covenant of Lead-Contaminated Dust from Former Use as an Indoor Firing Range

A. The Administration Building on the Property was formerly used as an indoor firing range. Lead-contaminated dust was remediated, and confirmation sampling indicates lead concentrations below 200 $\mu\text{g}/\text{ft}^2$. The Grantee, its successors and assigns are hereby notified and acknowledge that additional lead-contaminated dust remediation may be necessary for a particular use or to comply with applicable law. All costs for any additional remediation for lead-contaminated dust shall be at the sole expense of the Grantee, its successors or assigns, and not the United States. Furthermore, the remediation of lead-contaminated dust inside buildings is not within the scope of releases that make a response action necessary under CERCLA Section 120(h)(3)(A).

4. Pesticide Notification

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 8

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

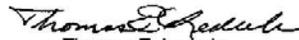
15 June 2012

MEMORANDUM FOR RECORD

SUBJECT: Results from the Radiological Survey at the Germantown Veterans Memorial U.S. Army Reserve Center (USARC) in Philadelphia, Pennsylvania

1. On 15 June 2012, the final survey work for the radiological release at the Germantown Veterans Memorial 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


Thomas E. Lederle
Deputy Chief, ACSIM
BRAC Division

ENCLOSURE 9
ASBESTOS SURVEY

DRAFT

ASBESTOS VISUAL INSPECTION REPORT



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

GERMANTOWN US ARMY RESERVE CENTER

PHILADELPHIA, PENNSYLVANIA

(USAR FACID: PA076 - SITE CODE: 42920)

July 2012

ASBESTOS VISUAL INSPECTION REPORT



GERMANTOWN US ARMY RESERVE CENTER
(PA076) - (42920)
5200 WISSAHIKEN AVENUE
PHILADELPHIA, PENNSYLVANIA,

Prepared 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

Germantown US Army Reserve Center – Philadelphia, PA

ASBESTOS INSPECTION REPORT

1. SUMMARY:

Asbestos Building Inspector from the Small Business Group (SBG) of Ladson, SC conducted a visual inspection to identify suspect asbestos containing material (ACM) located at the Germantown US Army Reserve Center located at 5200 Wissahikien Avenue in Philadelphia, PA. The inspection was conducted on July 16, 2012 utilizing modified Asbestos Hazard Emergency Response Act (AHERA) guidelines. The results of the inspections provide an inventory of assumed suspect ACM in the buildings at this site. No sampling was conducted during this visual inspection.

The Inspector is certified by an EPA accredited training center under AHERA guidelines as Building Inspector and licensed as required by the state of Pennsylvania. A copy of the inspector's license is located in the back of this report.

2. FINDINGS:

Thirty suspect materials were identified in the three structures located at this site. Information on each structure is listed below. The assumed ACM located at this site is listed in the Summary Table as Appendix A. Appendix B contains a drawing showing the floor plan of each building that contains assumed suspect materials.

3. STRUCTURES:

- Building 1: Main Administrative Building is an approximately 27,240 square foot concrete block structure with brick exterior and rolled roofing, constructed in 1957.
- Building 2: Maintenance Shop is an approximately 6,160 square foot concrete block structure with brick exterior and rolled roofing, constructed in 1957.
- Building 3: Administrative Addition is an approximately 5,360 square foot concrete block structure with brick exterior and rolled roofing, constructed in the 1980s.

4. OBSERVATIONS:

Previous sampling from 1987 indicated aircell piping & mudded fitting insulation, tank insulation, boiler insulation and 9" brown floor tiles located in the buildings. A Department of the Army memo dated 17 November 2000 notes that all previously listed ACM has been removed and our visual inspection confirms. But the quantities for piping (H-29) and fitting (H-30) insulation listed in this report include estimated quantities that may be behind ceilings and in pipe chases typical for this type of reserve center building. Building room numbers were either assigned by the inspector during the inspection or taken from actual rooms and are shown on the attached drawing (Appendix B).

**Germantown US Army Reserve Center – Philadelphia, PA
ASBESTOS INSPECTION REPORT**

A thorough and diligent inspection was conducted of this structure but some unidentified or inaccessible materials may still be present (i.e. wall voids, pipe chases, etc.). If previously unidentified suspect materials are found during renovation/demolition activities, samples should be taken to verify asbestos content prior to disturbance. Material quantities in this report are estimated and should be verified prior to any abatement activities.

5. SITE BUILDING PHOTOS:



Building 1: Main Admin Building



Building 2: Maintenance Shop



Building 3: Admin Addition Building

Intentionally

left

blank

MATERIAL SUMMARY TABLE

Building 1 - Main Administrative Building

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
1	12" white floor tile w/ green splotches/mastic	NF	8,640 SF	Good	High	Rooms 112, 114, 116, 123, 203, 207, 211, 212, 213, Entry E-001, Halls H100, H-101, H-102, H-200, and Stairways S -001 & S-002	Assumed ACM
2	6" Green coving/mastic	NA	149 LF	Good	Moderate	Entrance E-001, & Halls H-102 & H-200	Assumed ACM
3	Dark brown caulking	NF	1,050 LF	Good	High	Rooms 108, 112, 113, 119, 120, 123, 202, 207, 212, 213, 214, 215, 216, 217, Entry-001 and around exterior windows	Assumed ACM
4	Sheetrock/joint compound	NF	23,800 SF	Good	High	Throughout building	Assumed ACM
5	Ceiling tile wgrooves & pinholes	NF	13,645 SF	Good	Moderate	Throughout building	Assumed ACM
6	4" green coving/mastic	NF	2,100 SF	Good	Moderate	Rooms 108, 112, 114, 116, 123, 203, 207, 211, 212, 213 and Halls H-100, H-101, H-102 & H-200	Assumed ACM
7	Gypsum board ceiling tile	NF	660 LF	Good	Moderate	Rooms 109, 110 & 205	Assumed ACM
8	Plaster	NF	470 SF	Good	Moderate	Rooms 109, 110 & 113	Assumed ACM
9	Dark brown coving/mastic	NF	95 LF	Good	Moderate	Stairways S-001 & S-002	Assumed ACM
10	Stair tread mastic	NF	65	Good	High	Stairways S-002	Assumed ACM
11	White door caulking	NF	565 LF	Good	Moderate	Around doors in Rooms 111, 112, 114, 115, 116, 117, 118, 119, 120, 123, 202, 205, 211, 212, 214, 215, 216 & Hall H-200	Assumed ACM

MATERIAL SUMMARY TABLE

Building 1 - Main Administrative Building (Cont.)

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
12	Yellow carpet mastic	NF	4,470 SF	Good	Low	Rooms 117, 118, 119, 120, 121, 122, 202, 214, 215, 216, & 217	Assumed ACM
13	Tan ceiling mastic	NF	170 LF	Good	Low	Room 1117	Assumed ACM
14	12" tan brown/white marbled floor tile/mastic	NF	470 SF	Good	High	Room 119	Assumed ACM
15	Black floor tile/mastic	NF	315 SF	Good	Low	Under carpet in Rooms 119, 120, 121, 122, 216, & 217	Assumed ACM
16	9" tan floor tile w/brown & white streaks/mastic	NF	375 SF	Good	Low	Under carpet in Rooms 120 & 217	Assumed ACM
17	12" tan floor tile w/brown streaks/mastic	NF	626 SF	Good	Low	Under carpet in checkerboard pattern with H-18 tile in Rooms 121 & 122	Assumed ACM
18	12" brown floor tile w/tan streaks /mastic	NF	480 SF	Good	Low	Under carpet in checkerboard pattern with H-17 tile in Rooms 121 & 122 and in Room 216	Assumed ACM
19	Vault door	NF	1 each	Good	Low	Room 124	Assumed ACM
20	12" beige floor tile w/brown & white streaks/mastic	NF	285 SF	Good	Low	Under carpet in Room 214	Assumed ACM
21	12" gray marbled floor tile /mastic	NF	50 SF	Good	Low	Under carpet in Room 216	Assumed ACM
22	12" red marbled/mastic	NF	50 SF	Good	Low	Under carpet in Room 217	Assumed ACM
27	Gray vent duct mastic	NF	25 SF	Good	Low	Room 107	Assumed ACM

MATERIAL SUMMARY TABLE

Building 1 - Main Administrative Building (Cont.)

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
28	Gray rolled roofing	NF	27,240 SF	Good	Low	Roofs	Assumed ACM
29	Aircell piping insulation	F	600 LF	Good	Low	Estimated amount to be in inaccessible areas behind 1st floor ceilings & in the pipe chases	Assumed ACM
30	Mudded fitting insulation	F	50 SF	Good	Low	Estimated amount to be in inaccessible areas behind 1st floor ceilings & in the pipe chases	Assumed ACM

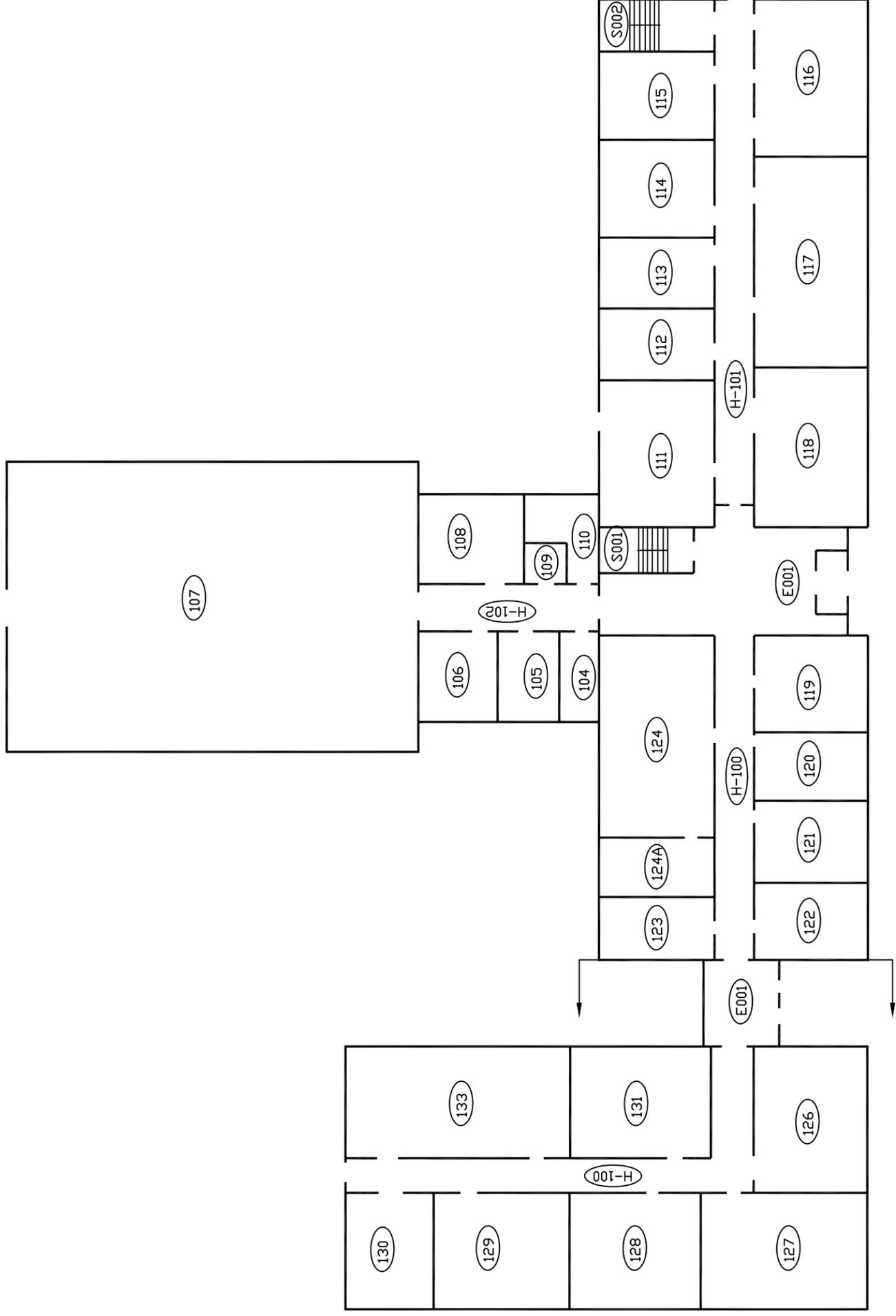
Building 2 - Maintenance Shop

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
3	Dark brown caulking	NF	480 LF	Good	Low	Around interior & exterior sides of windows and exterior vent	Assumed ACM
11	White door caulking	NF	17 LF	Good	Moderate	Around entry door in Room 100	Assumed ACM
27	Gray vent duct mastic	NF	25 SF	Good	Low	Room 100	Assumed ACM
28	Gray rolled roofing	NF	6,160 SF	Good	Low	Roof	Assumed ACM

MATERIAL SUMMARY TABLE

Building 3 - Administrative Addition Building

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
1	12" white floor tile w/ green splotches/mastic	NF	900 SF	Good	High	Rooms 129, E-001 & Hall H-100	Assumed ACM
2	6" Green coving/mastic	NF	170 LF	Good	Moderate	Entry E-001, & Hall H-100	Assumed ACM
3	Dark brown caulking	NF	40 LF	Good	Moderate	Entry E-001	Assumed ACM
5	Ceiling tile grooves & pinholes	F	2,850 SF	Good	Moderate	Rooms 126, 128, 129, 130, Entry E-001 & Hall H-100	Assumed ACM
6	4" green coving/mastic	NF	200LF	Good	Moderate	Room 126 & Hall H-100	Assumed ACM
12	Yellow carpet mastic	NF	1,910 SF	Good	Low	Rooms 127, 128, 129 & 130	Assumed ACM
15	Black floor tile/mastic	NF	100 SF	Good	Low	Under carpet in Room 129	Assumed ACM
16	9" tan floor tile w/brown & white streaks/mastic	NF	1,515 SF	Good	Low	Under carpet in Rooms 127, 128 & 129	Assumed ACM
23	Sheetrock/joint compound	F	5,190 SF	Good	High	Rooms 126, 127, 129, 130, 131 & 133	Assumed ACM
24	Soft white door caulk	NF	300 LF	Good	Moderate	Around doors in Rooms 126, 127, 128, 129, 130 131, 133	Assumed ACM
25	Black window caulking	NF	245 LF	Good	Moderate	Rooms 127, 129, 130, 131 & 133	Assumed ACM
26	12" tan w/heavy brown & white marbling/mastic	NF	950 SF	Good	Low	Under carpet in Rooms 128 & 130	Assumed ACM
28	Gray rolled roofing	NF	5,360 SF	Good	Low	Roof	Assumed ACM



BUILDING_1

BUILDING_3

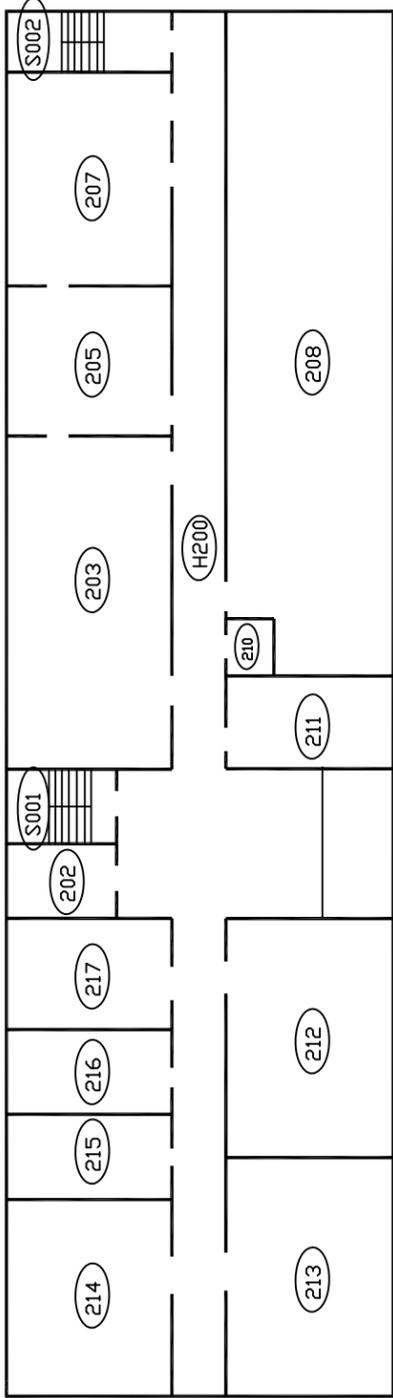
LEGEND

XXX --- Indicates unique room number assigned by inspector

SBG-EEG
 7301 RIVERS AVE., SUITE 245
 N. CHARLESTON SC 29406-9643
 (843) 573-7140

APPENDIX B
 ASBESTOS SAMPLE LOCATIONS
 BUILDING 1 & BUILDING 3
 ARC GERMANTOWN (PA076)
 PHILADELPHIA, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
JULY 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER	SHEET	
NONE	SBG_PA076-B1+B3_07-2012	1 OF 3	

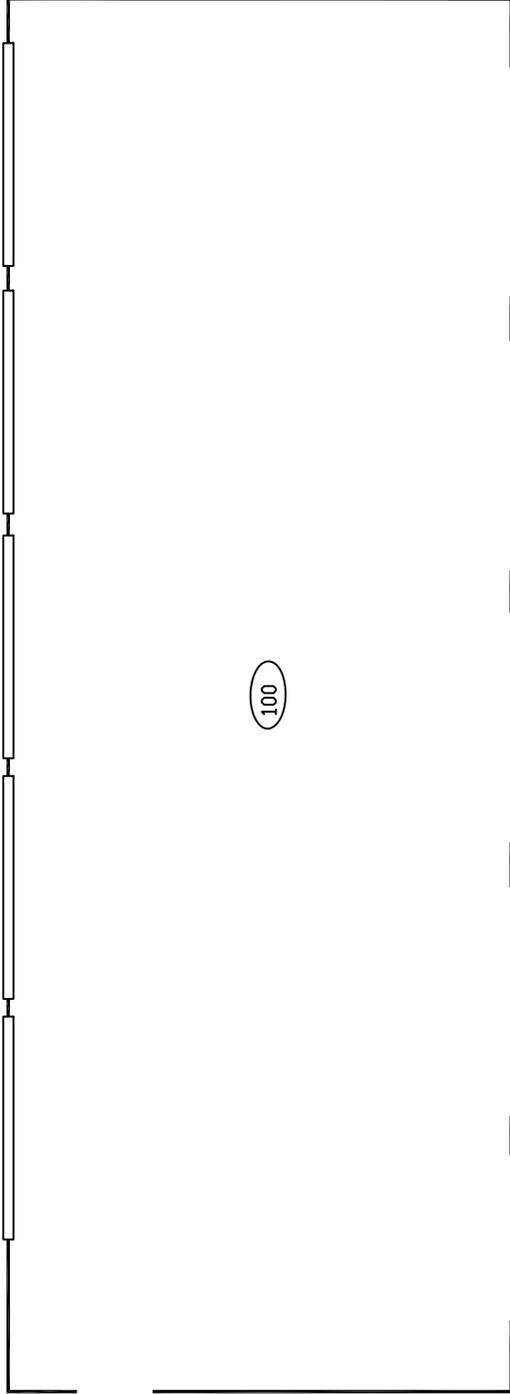


BUILDING_1_SECOND_FLOOR

LEGEND

(XXX) --- Indicates unique room number assigned by inspector

SBG-EEG 7301 RIVERS AVE., SUITE 245 N. CHARLESTON SC 29406-9643 (843) 573-7140		APPENDIX B ASBESTOS SAMPLE LOCATIONS BUILDING 1, SECOND FLOOR ARC GERMANTOWN (PA076) PHILADELPHIA, PENNSYLVANIA		
		DATE JULY 2012	PREPARED BY M. MOLTZEN	DRAWN BY L. C. DIASIO
		SCALE NONE	DWG NUMBER SBG_PA076-B1FL2_07-2012	SHEET 2 OF 3



100

LEGEND

--- Indicates unique room number assigned by inspector

XXX

SBG-EEG

7301 RIVERS AVE., SUITE 245
 N. CHARLESTON SC 29406-9643
 (843) 573-7140

APPENDIX B
 ASBESTOS SAMPLE LOCATIONS
 BUILDING 2
 ARC GERMANTOWN (PA076)
 PHILADELPHIA, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
JULY 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER		SHEET
NONE	SBG_PA076-B2_07-2012		3 OF 3

STATE ASBESTOS INSPECTOR LICENSE

PENNSYLVANIA ASBESTOS CERTIFICATION

048996

	Sex: M	Height: 5'09"	Eyes: BLU	Birth Date: 12/18/1953
	Expires: 02/08/2013	Issue Date: 03/09/2012		
	Class: INSPECTOR			
	MARK MOLTZEN 337 MUIRFIELD PKWY CHARLESTON SC 29414			

Mark Moltzen

Background text: BERKSHIRE, BUTTE, CAMDEN, CHESTER, CLAY, COCHRAN, COLUMBIA, CRAWFORD, DELAWARE, FRANKLIN, GALLUP, GREENE, HUNTERDON, JEFFERSON, JERSEY, LANCASTER, LEHIGH, MERCER, MONTGOMERY, NORTHAMPTON, PHILADELPHIA, PITTSBURGH, SCHUYLKER, SHERBURNE, SULLY, TOWNSHIP, UNION, WARREN, WASHINGTON, WYOMING, YORK

ENCLOSURE 10
Indoor Firing Range, Lead Sampling Report

DRAFT

INDOOR FIRING RANGE LEAD SAMPLE REPORT



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

**GERMANTOWN ARC
PHILADELPHIA, PENNSYLVANIA**

(USAR FACID: PA076 - SITE CODE: 42920)

August 2012

INDOOR FIRING RANGE LEAD SAMPLE REPORT



**GERMANTOWN US ARMY RESERVE CENTER
(PA076) - (42920)
5200 WISSAHIKEN AVENUE
PHILADELPHIA, PENNSYLVANIA**

Prepared 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 – PHILADELPHIA INDOOR FIRING RANGE LEAD SAMPLING REPORT

Germantown Army Reserve Center

(Philadelphia, PA)

Introduction

A Lead inspector from the Small Business Group, Inc. (SBG) conducted lead sampling at Germantown Army Reserve Center located at 5200 Wissahiken Avenue, Philadelphia, PA. Lead wipe sampling was conducted on the interior of the indoor firing range (IFR) and soil sampling on the exterior side of the firing range along the drip line. The sampling was performed 7/16/12. The IFR rooms appear to have been abated as there is no remaining firing range equipment present and the rooms appear to be retrofitted for reoccupation. The 99th RSC believes that lead abatement was performed prior to reoccupation, however such reports cannot be located. Therefore the intent of this lead sampling project was to confirm that abatement previously occurred and that present levels are within the Army clean-up standard of 200 µg/ft².

Sampling

Lead wipe and soil sampling was conducted in accordance with federal, state and local regulations. The Environmental Protection Act (EPA) and Housing and Urban Development (HUD) protocol was used. Samples were collected inside and outside (soil) of the firing range and at various locations throughout the building. Samples were sent for analysis to Environmental Hazards Services, L.L.C., an NLLAP certified Laboratory.

The following levels indicate acceptable lead levels for wipes and soil samples:

- Army wipe clean level – < 200 µg/ft² (Dept of Army & Air Force Pam 420-15, 3 November 2006, Facilities Engineering Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges)
- Soil – 1200 PPM (non-play areas) (EPA / HUD)

Twenty total wipe samples were collected, twelve in the former firing range area and the remainder from throughout the building. One field blank was submitted with the samples. Six locations along the outside drip line of the firing range were combined into two composite samples for this project. See Appendix A and attached laboratory results for the lead wipe results.

US ARMY RESERVE CENTER – PHILADELPHIA

INDOOR FIRING RANGE LEAD SAMPLING REPORT

The four sides of the building are lettered for identification purposes starting with the letter A. The A side of the structure is the main entry or front side of the building. Starting on the A side, the remaining sides are lettered consecutively (B, C, D) going clockwise around the building. (See Appendix B for building floor plan and sample locations).

Conclusions

Wipe Samples:

All of the wipe sample results were well below the Army standard of 200 $\mu\text{g}/\text{ft}^2$ for IFR cleanliness levels, therefore we suggest that no further action is required.

Soil Samples:

Two composite soil samples were collected and the results are below the EPA/HUD recommended levels for non-play levels (1200 ppm). EPA/HUD guidelines also have a bare soil play area level of 400 ppm. There are no bare soil areas outside of the IFR and the sampling area is not a play area and its location (outside fenced area along Wissahiken Avenue) would suggest the area would never be utilized as a play area. Therefore we suggest that no further action is required.

FIELD DATA RESULTS

LEAD WIPE SAMPLES

Sample No	Type	Component	Substrate	Location (Room #)	Total Pb (µg)	Concentration (µg/ft ²)
ARC Philly PB 001	Wipe	Floor	Concrete	208*	<10	<91
ARC Philly PB 002	Wipe	Floor	Concrete	208*	<10	<91
ARC Philly PB 003	Wipe	Floor	Concrete	208*	15.8	<91
ARC Philly PB 004	Wipe	Wall C	Drywall	208*	<10	<91
ARC Philly PB 005	Wipe	Wall A	Drywall	208*	<10	<91
ARC Philly PB 006	Wipe	Wall B	Drywall	208*	<10	<91
ARC Philly PB 007	Wipe	Ceiling	Concrete	208*	<10	<91
ARC Philly PB 008	Wipe	Ceiling	Concrete	208*	<10	<91
ARC Philly PB 009	Wipe	Ceiling	Concrete	208*	<10	<91
ARC Philly PB 010	Wipe	Wall B	Drywall	208*	<10	<91
ARC Philly PB 011	Wipe	Wall A	Concrete	208*	<10	<91
ARC Philly PB 012	Wipe	Floor	Concrete	208*	<10	<91
ARC Philly PB 013	Wipe	Floor	Floor tile	S002	<10	<10
ARC Philly PB 014	Wipe	Window sill	Wood	203	14.8	15
ARC Philly PB 015	Wipe	Floor	Floor tile	207	<10	<10
ARC Philly PB 016	Wipe	Wall	Block	H200	<10	<10
ARC Bristol PB 017	Wipe	Floor	Floor tile	H200	<10	<10
ARC Philly PB 018	Wipe	Floor	Floor tile	H200	<10	<10
ARC Philly PB 019	Wipe	Floor	Floor tile	S001	<10	<10
ARC Philly PB 020	Wipe	Field Blank	NA	NA	<10	<10

SOIL SAMPLES

Sample No	Type	Component	Substrate	Location	 	Concentration PPM
ARC Philly CS 001	Composite	Soil Samples	Soil	Exterior	 	250
ARC Philly CS 002	Composite	Soil Samples	Soil	Exterior	 	500

* Indicates samples inside IFR



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

Lead Dust Wipe Analysis Report

Report Number: 12-08-00114

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

Received Date: 08/01/2012
 Analyzed Date: 08/02/2012
 Reported Date: 08/16/2012

Project/Test Address: 99th RSC ABS/Lead Project; Philadelphia, PA
 Collection Date: 7/16/2012

Client Number:
 42-4515

Laboratory Results

Fax Number:
 843-879-0401

Lab Sample Number	Client Sample Number	Collection Location	Surface	Total Pb (ug)	Wipe Area (ft ²)	Concentration (ug/ft ²)	Narrative ID
12-08-00114-001	ARC Philly PB-001	ROOM 208	FL	<10.0	0.111	<91	
12-08-00114-002	ARC Philly PB-002	ROOM 208	FL	<10.0	0.111	<91	
12-08-00114-003	ARC Philly PB-003	ROOM 208	FL	15.8	0.111	140	
12-08-00114-004	ARC Philly PB-004	ROOM 208		<10.0	0.111	<91	
12-08-00114-005	ARC Philly PB-005	ROOM 208		<10.0	0.111	<91	
12-08-00114-006	ARC Philly PB-006	ROOM 208		<10.0	0.111	<91	
12-08-00114-007	ARC Philly PB-007	ROOM 208		<10.0	0.111	<91	
12-08-00114-008	ARC Philly PB-008	ROOM 208		<10.0	0.111	<91	
12-08-00114-009	ARC Philly PB-009	ROOM 208		<10.0	0.111	<91	
12-08-00114-010	ARC Philly PB-010	ROOM 208		<10.0	0.111	<91	
12-08-00114-011	ARC Philly PB-011	ROOM 208		<10.0	0.111	<91	
12-08-00114-012	ARC Philly PB-012	ROOM 208	FL	<10.0	0.111	<91	
12-08-00114-013	ARC Philly PB-013	ROOM S002	FL	<10.0	1.00	<10	
12-08-00114-014	ARC Philly PB-014	ROOM 203	SL	14.8	1.01	15	

Rev 1.0 (Revised On: 08/16/2012): Amended surface type from cabinet to floor on sample #012, per client request.

Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00114

Project/Test Address: 99th RSC ABS/Lead Project; Philadelphia, PA

Lab Sample Number	Client Sample Number	Collection Location	Surface	Total Pb (ug)	Wipe Area (ft ²)	Concentration (ug/ft ²)	Narrative ID
12-08-00114-015	ARC Philly PB-015	ROOM 207	FL	<10.0	1.00	<10	
12-08-00114-016	ARC Philly PB-016	ROOM H200		<10.0	1.00	<10	
12-08-00114-017	ARC Philly PB-017	ROOM H200	FL	<10.0	1.00	<10	
12-08-00114-018	ARC Philly PB-018	ROOM H200	FL	<10.0	1.00	<10	
12-08-00114-019	ARC Philly PB-019	ROOM S001	FL	<10.0	1.00	<10	
12-08-00114-020	ARC Philly PB-020	ROOM 136	FL	<10.0	1.00	<10	

Method: EPA SW846 7000B

Accreditation #: SC 93012001

Reviewed By Authorized Signatory: 
 Deborah Britt
 QA/QC Clerk

The Federal lead guidelines for dust clearance levels by wipe sampling: Floors (FL) - 40 ug/ft², Interior Window Sills (SL) - 250 ug/ft², Window Wells (WW) - 400 ug/ft². The Reporting Limit (RL) is 10.0 ug Total Pb. Reported results are not corrected for field blanks. Dust wipe area and results are calculated based on area measurements determined by the client. All internal quality control requirements associated with this batch were met, unless otherwise noted.

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Results represent the analysis of samples submitted by the client. Sample location, description, area, etc., was provided by the client. Results reported above in ug/ft² are calculated based on area supplied by the client. If the report does not contain the result for a field blank, it is due to the fact that the client did not include a field blank with their samples. EHS sample results do not reflect blank correction. 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.

Legend	ug = microgram	ug/ft ² = micrograms per square foot	Pb = lead
	mL = milliliter	ft ² = square foot	

12-08-00114



Environmental Hazards Services, LLC

www.leadlab.com 7469 Whitepine Rd
(800) 347-4010 Richmond, VA
(804) 275-4907 (fax) 23237

Lead Chain-of-Custody

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

~F1
[Signature]

Company Name: SBG, Inc. Address: 10179 Hwy 78 City/State/Zip: Ladson, SC 29456
Phone: (843) 412-2057 Fax: (843) 879-0401 E-mail: brown@sbg-eeg.com Acct. Number:
Project Name / Testing Address: 99th RSC ABS/Lead Project City/State (Required): Philadelphia PA
Collected by: Curtis Brown Certification Number: SC-I-18953-1 Purchase Order Number:

* Do wipe samples submitted meet ASTM E1792 requirements? Yes No

Turn Around Time (TAT)
 1-Day 3-Day
 Same Day (Must Call Ahead)
 Weekend (Must Call Ahead)
If no TAT is specified, sample(s) will be processed and charged as 3-Day TAT.

Sample Type
Single Dust Wipe = DW Soil = S
Paint Chip = PC Air = A
Composite Soil = CS

Abbreviations
FR = Family Room
LR = Living Room
DN = Den
DR = Dining Room
1 = 1st Fl
0 = Basement
KT = Kitchen
BA = Bath
BR = Bedroom
2 = 2nd Fl

Surface Type for Dust Wipe
FL = Floor
CP = Carpet
SL = Window Sill
WW = Window Well

No.	Sample Type	Date Collected	Client Sample ID	Collection Location (L.R, K.T, L.T.F.B.R, R.T.R.B.R, etc.)			Surface Type	Area Length X Width in inches (Provide paint chip area only if requesting mg/cm2)	Paint Chip		Air		Comments			
				R	O	M			%	Total Time (minutes)	Volume (Total Liters)					
1	DW	7/16/12	ARC Philly PB-001	R	O	M	2	0	8	FL	4	X	4			Concrete
2	DW	7/16/12	ARC Philly PB-002	R	O	M	2	0	8	FL	4	X	4			Concrete
3	DW	7/16/12	ARC Philly PB-003	R	O	M	2	0	8	FL	4	X	4			Concrete
4	DW	7/16/12	ARC Philly PB-004	R	O	M	2	0	8	Wall - C	4	X	4			Drywall
5	DW	7/16/12	ARC Philly PB-005	R	O	M	2	0	8	Wall - A	4	X	4			Drywall
6	DW	7/16/12	ARC Philly PB-006	R	O	M	2	0	8	Wall - B	4	X	4			Drywall
7	DW	7/16/12	ARC Philly PB-007	R	O	M	2	0	8	Ceiling	4	X	4			Concrete
8	DW	7/16/12	ARC Philly PB-008	R	O	M	2	0	8	Ceiling	4	X	4			Concrete
9	DW	7/16/12	ARC Philly PB-009	R	O	M	2	0	8	Ceiling	4	X	4			Concrete
10	DW	7/16/12	ARC Philly PB-010	R	O	M	2	0	8	Wall - B	4	X	4			Drywall-Lo flo

Released by: *[Signature]*
Received by: *[Signature]*

Date/Time: 7/30/12
Date/Time: 8-1-12

114



Lead Chain-of-Custody

~For Lab Use Only~

Environmental Hazards Services, LLC
 www.leadlab.com 7469 Whitepine Rd
 (800) 347-4010 Richmond, VA
 (804) 275-4907 (fax) 23237

Company Name: **SBG, Inc.** Address: **10179 Hwy 78** City/State/Zip: **Ladson, SC 29456**
 Phone: **843, 412-2057** Fax: **843, 879-0401** E-mail: **brown@sbg-eeg.com** Acct. Number:
 Project Name / Testing Address: **99th RSC ABS/Lead Project** City/State (Required): **Philadelphia PA**
 Collected by: **Curtis Brown** Certification Number: **SC-I-18953-1** Purchase Order Number:

* Do wipe samples submitted meet ASTM E1792 requirements? Yes No

Turn Around Time (TAT)
 1-Day 3-Day
 Same Day (Must Call Ahead)
 Weekend (Must Call Ahead)
 If no TAT is specified, sample(s) will be processed and charged as 3-Day TAT.

No.	Sample Type	Date Collected	Client Sample ID	Collection Location (LR, KT, LTFBR, RTRBR, etc.)						Surface Type	Area Length X Width in inches (Provide paint chip area only if requesting mg./sq. ft.)	Paint Chip		Air		Comments		
				R	O	O	M	2	0			8	Flow Rate (L/min)	Total Time (minutes)	Volume (Total Liters)			
11	DW	7/16/12	ARC Phily PB-011	R	O	O	M	2	0	8	Wall A	4	X	4				Concrete-lo flo
12	DW	7/16/12	ARC Phily PB-012	R	O	O	M	2	0	8	Cabinet	4	X	4				Concrete-lo flo
13	DW	7/16/12	ARC Phily PB-013	R	O	O	M	S	0	0	FL	12	X	12				1st Floor tile
14	DW	7/16/12	ARC Phily PB-014	R	O	O	M	2	0	3	SL	29	X	5				Wood
15	DW	7/16/12	ARC Phily PB-015	R	O	O	M	2	0	7	FL	12	X	12				Floor tile
16	DW	7/16/12	ARC Phily PB-016	R	O	O	M	H	2	0	Wall	12	X	12				Conc. block
17	DW	7/16/12	ARC Phily PB-017	R	O	O	M	H	2	0	FL	12	X	12				Floor tile
18	DW	7/16/12	ARC Phily PB-018	R	O	O	M	H	2	0	FL	12	X	12				Floor Tile
19	DW	7/16/12	ARC Phily PB-019	R	O	O	M	S	0	0	FL	12	X	12				2nd Floor tile
20	DW	7/16/12	ARC Phily PB-020	R	O	O	M	1	3	6	FL	12	X	12				Floor tile

No.	Sample Type	Date Collected	Client Sample ID	Collection Location (LR, KT, LTFBR, RTRBR, etc.)						Surface Type	Area Length X Width in inches (Provide paint chip area only if requesting mg./sq. ft.)	Paint Chip		Air		Comments		
				R	O	O	M	2	0			8	Flow Rate (L/min)	Total Time (minutes)	Volume (Total Liters)			
11	DW	7/16/12	ARC Phily PB-011	R	O	O	M	2	0	8	Wall A	4	X	4				Concrete-lo flo
12	DW	7/16/12	ARC Phily PB-012	R	O	O	M	2	0	8	Cabinet	4	X	4				Concrete-lo flo
13	DW	7/16/12	ARC Phily PB-013	R	O	O	M	S	0	0	FL	12	X	12				1st Floor tile
14	DW	7/16/12	ARC Phily PB-014	R	O	O	M	2	0	3	SL	29	X	5				Wood
15	DW	7/16/12	ARC Phily PB-015	R	O	O	M	2	0	7	FL	12	X	12				Floor tile
16	DW	7/16/12	ARC Phily PB-016	R	O	O	M	H	2	0	Wall	12	X	12				Conc. block
17	DW	7/16/12	ARC Phily PB-017	R	O	O	M	H	2	0	FL	12	X	12				Floor tile
18	DW	7/16/12	ARC Phily PB-018	R	O	O	M	H	2	0	FL	12	X	12				Floor Tile
19	DW	7/16/12	ARC Phily PB-019	R	O	O	M	S	0	0	FL	12	X	12				2nd Floor tile
20	DW	7/16/12	ARC Phily PB-020	R	O	O	M	1	3	6	FL	12	X	12				Floor tile

Released by: **DSB/IT** Signature: _____ Date/Time: **8-1-12**
 Received by: **DSB/IT** Signature: _____ Date/Time: _____



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

Lead in Soil Analysis Report

Report Number: 12-08-00110

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

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

Project/Test Address: 99th RSC Asb/Lead Inspection Project, Philadelphia, PA
 Collection Date:

Client Number:
 42-4515

Laboratory Results

Fax Number:
 843-879-0401

Lab Sample Number	Client Sample Number	Collection Location	Concentration ppm (ug/g)	Narrative ID
12-08-00110-001	ARC PHILLY CS-001	RANGE EXT	250	
12-08-00110-002	ARC PHILLY CS-002	RANGE EXT	500	

Method: EPA SW846 7000B
 Accreditation #: SC 93012001

Reviewed By Authorized Signatory:

Deborah Britt
 QA/QC Clerk

The Federal lead guidelines for lead in soil is 400 ug/g (ppm) in play areas, and 1200 ug/g (ppm) in bare soil in the remainder of the yard. The Reporting Limit (RL) is 10.0 ug Total Pb. All internal quality control requirements associated with this batch were met, unless otherwise noted.

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. If the report does not contain the result for a field blank, it is due to the fact that the client did not include a field blank with their samples. EHS sample results do not reflect blank correction. 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.

LEGEND ug = microgram ppm = parts per million
 ug/g = micrograms per gram

12-08-00110



Environmental Hazards Services, LLC

www.leadlab.com 7469 Whitepine Rd
(800) 347-4010 Richmond, VA
(804) 275-4907 (fax) 23237

Lead Chain-of-Custody

Due Date:

08/06/2012

(Monday)

AE

~F

Company Name: **SBG, Inc.** Address: **10179 Hwy. 78** City/State/Zip: **Ladson, SC 29456**

Phone: **(843) 412-2057** Fax: **(843) 879-0401** E-mail: **brown@sbg-eeg.com** Acct. Number:

Project Name / Testing Address: **99th RSC Asb/Lead Inspection Project** City/State (Required): **Philadelphia, PA**

Collected by: **Curtis Brown** Certification Number: **SC-I-18953-1** Purchase Order Number:

* Do wipe samples submitted meet ASTM E1792 requirements? Yes No

Turn Around Time (TAT)
 1-Day 3-Day
 Same Day (Must Call Ahead)
 Weekend (Must Call Ahead)
 If no TAT is specified, sample(s) will be processed and charged as 3-Day TAT.

Sample Type
 Single Dust Wipe = DW Soil = S
 Paint Chip = PC Air = A
 Composite Soil = CS

Sample Type for Dust Wipe
 FL = Floor
 CP = Carpet
 SL = Window Sill
 WW = Window Well

Abbreviations
 F = Front 0 = Basement
 R = Rear KT = Kitchen
 LT = Left BA = Bath
 RT = Right BR = Bedroom
 2 = 2nd Fl

FR = Family Room
 LR = Living Room
 DN = Den
 DR = Dining Room
 I = 1st Fl

No.	Sample Type	Date Collected	Client Sample ID	Collection Location (LR, KT, LTFBR, RTRBR, etc.)				Surface Type	Area Length X Width in sq feet (Prevalent paint chip area only if requesting mg/cm ²)	Paint Chip		Air		Comments			
				R	A	n	g			e	e	x	t		%	Total Time (minutes)	Volume (Total Liters)
1	CS		ARC-Philly CS-001	R	A	n	g	e	e	x	t	Soil	X				
2	CS		ARC-Philly CS-002	R	A	n	g	e	e	x	t	Soil	X				
3													X				
4													X				
5													X				
6													X				
7													X				
8													X				
9													X				
10													X				

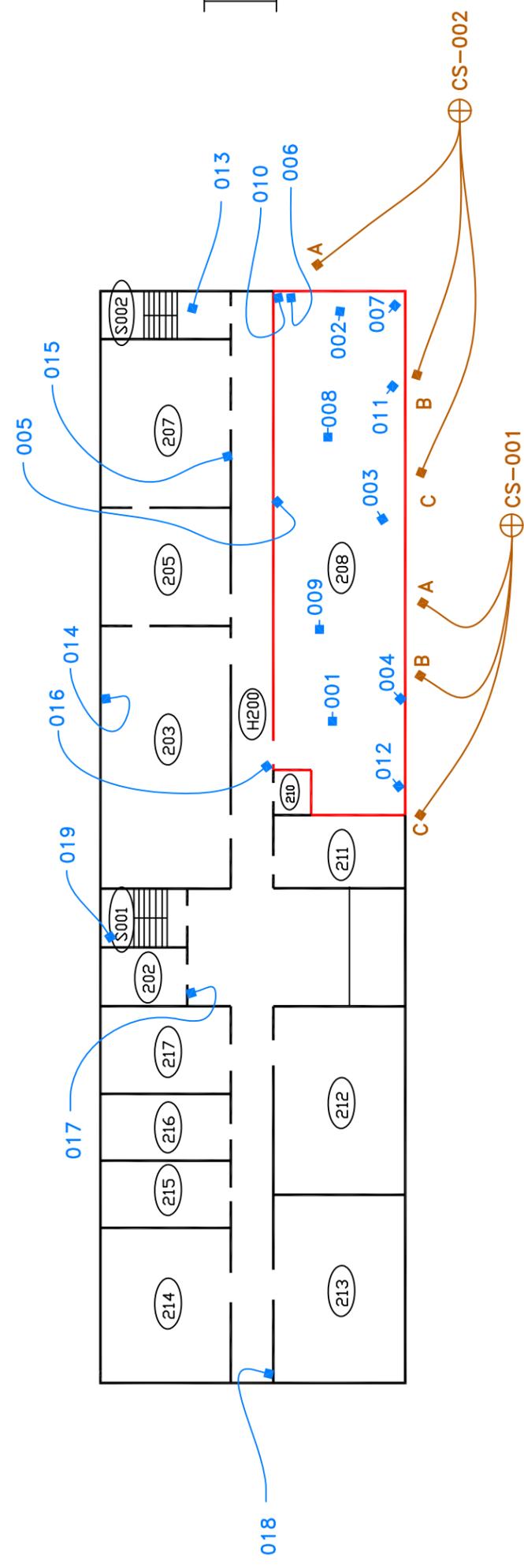
Released by: *Curtis Brown* Signature: *Curtis Brown* Date/Time: **7/30/12**

Received by: *SBG, Inc.* Signature: *SBG, Inc.* Date/Time: **8-1-12**

C

B

D



BUILDING 1 SECOND FLOOR

A

LEGEND

- (XXX) --- Indicates unique room number assigned by inspector
- Indicates lead based paint wipe sample
- ⊕ CSxxx --- Indicates composite soil sample
- --- Indicates firing range

<p>SBG-EEG 7301 RIVERS AVE., SUITE 245 N. CHARLESTON SC 29406-9643 (843) 573-7140</p>		<p>APPENDIX B LEAD SAMPLE LOCATIONS BUILDING 1, SECOND FLOOR ARC GERMANTOWN (PA076) PHILADELPHIA, PENNSYLVANIA</p>	
		<p>DATE: JULY 2012 SCALE: NONE</p>	<p>PREPARED BY: M. MOLTZEN DWG NUMBER: SBG_PA076_LBP-B1FL2_07-2012</p>

United States Environmental Protection Agency

This is to certify that

Curtis R. Brown

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226 as a:

Inspector

In the Jurisdiction of:

South Carolina

This certification is valid from the date of issuance and expires October 7, 2012

SC-I-18953-1

Certification #

OCT 23 2009

Issued On


Jeaneanne M. Gettle, Chief
Pesticides and Toxic Substances Branch



ENCLOSURE 11

REGULATORY/PUBLIC COMMENTS & ARMY RESPONSE

WILL UPDATE AFTER PUBLIC COMMENT PERIOD

- 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 concurred with the findings in the FOST in a letter dated _____.
- The Draft FOST was sent to US EPA Region 2 on _____. The EPA responded in an email dated _____ stating the Federal Facilities Branch at Region 2 does not review FOSTs for non-BRAC ECP Category 1-4 sites.
- No Army response to comments necessary, as no comments were received upon 30-day comment period completion.