

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

**Wilkes-Barre U.S. Army Reserve Center (PA099)
1001 Highway 315 South
Wilkes-Barre, Pennsylvania 18701**

September 2012

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

**Wilkes-Barre USAR Center (PA099)
Wilkes-Barre, 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 Wilkes-Barre United States Army Reserve (USAR) Center, located in Wilkes-Barre, Pennsylvania, for transfer to Plains Township consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy. In addition, the FOST includes an Access Provision, 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 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 as an Emergency Services Center for Plains Township, PA Police and Fire Departments per the Plains Township Local Redevelopment Authority's Reuse Plan dated January 2009. 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: Wilkes-Barre USAR Center (PA099); 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 June 1993, a 1,000-gallon No. 2 heating oil UST was removed from the eastern side of the OMS building. Confirmation samples were collected and analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons – diesel range organics (TPH-DRO). No BTEX was detected in soil samples, but TPH-DRO ranged from 19 milligrams per kilogram (mg/kg) to 360 mg/kg. The UST Closure report was submitted to the Pennsylvania Department of Environmental Protection (PADEP) and attributed elevated TPH-DRO concentrations to coal residue in the sample. See Section 3.4 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.

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 no ASTs. There was one UST on the Property that has been removed. The UST contained No. 2 heating oil and was removed from the ground in 1993. TPH-DRO concentrations ranged from 19 mg/kg to 360 mg/kg, but were attributed to coal residue in the soil sample. See Section 4.1 Environmental Investigation Sites for additional information.

See Section 3.4 of the 2007 ECP Report for additional information. A summary of the UST/AST petroleum product activities is provided in Table 2 – 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)

There is no evidence that PCB-containing equipment is located or was previously located on the property. The three pole-mounted transformers located adjacent to the Administration Building were sampled for PCBs in 1990 and PCBs were not detected. This equipment is owned and operated by UGE Corporation and has been determined not to be leaking.

4.5. Asbestos

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

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) 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. The deed will include a lead-based paint warning and covenant (Enclosure 6).

4.7. Indoor Firing Ranges

The following building is known to contain lead-contaminated dust from a former indoor firing range, Administration Building. Lead-contaminated dust was remediated to concentrations below 200 $\mu\text{g}/\text{ft}^2$. See 2007 ECP Report, § 6.9 and 1994 Final Lead Abatement Report for additional information. The deed will include a lead-contaminated dust notice and covenant. (Enclosure 6).

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 12 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.

4.9. Radon

Radon surveys were conducted in 1995 in the Administration Building on the property. Radon was detected at above the EPA residential action level of 4 picocuries per liter (pCi/L) in the following buildings: Administration Building. A radon mitigation system was installed in 1995 and radon levels dropped below the EPA residential action level of 4.0 picocuries per liter (pCi/L). 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 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 Record of Environmental Consideration, September, 2012. There were no encumbrances or conditions identified in the NEPA analysis as necessary to protect human health or the environment.

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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 and Other Deed Provisions.

WILLIAM D. R. WAFF
Major General

Date

Enclosures

- 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

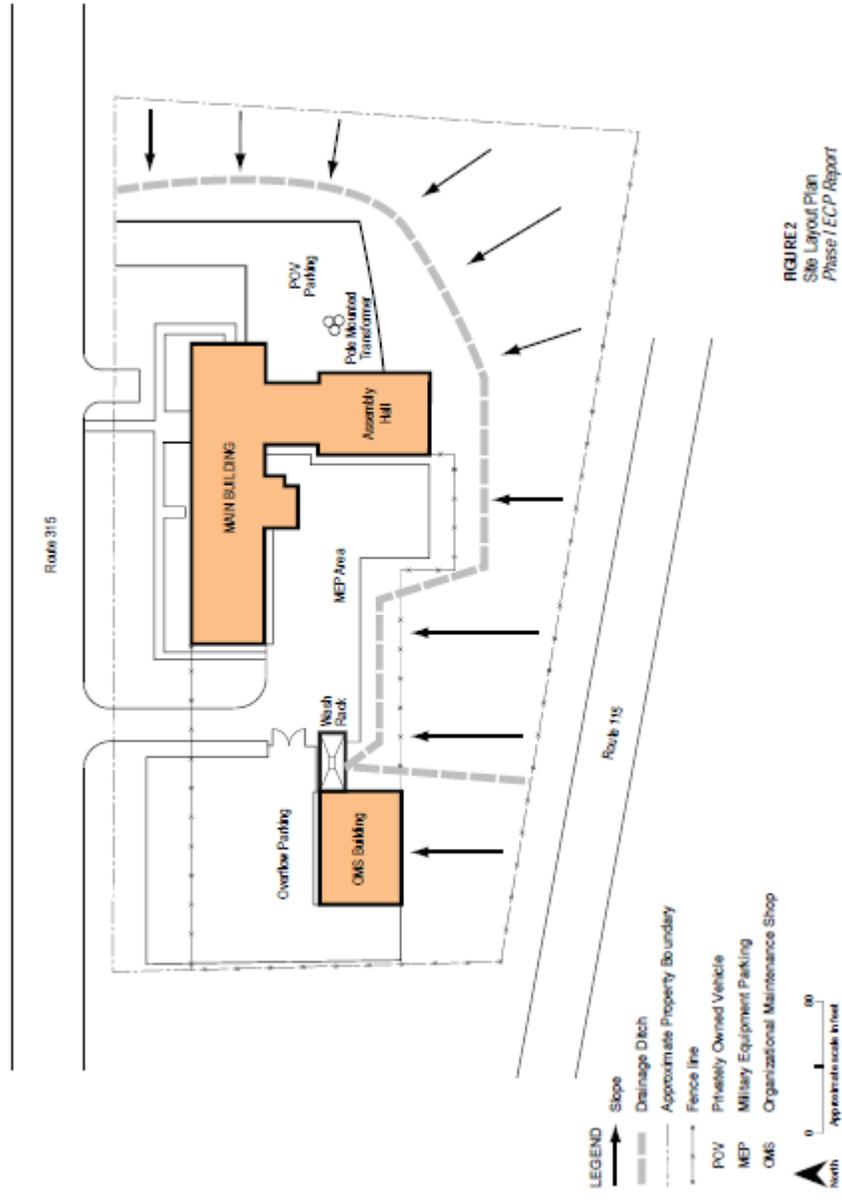


FIGURE 2
Site Layout Plan
Phase I/ECP Report

CH2M

ENCLOSURE 1: WHE_Demington_2_Site_Layout/Plan_01_100106.mxd

*Source: 2007 ECP Report

ENCLOSURE 2

ENVIRONMENTAL DOCUMENTATION

Document	Source
Environmental Condition of Property Report for Wilkes-Barre U.S. Army Reserve Center (PA099), Bethlehem, Pennsylvania, prepared by CH2M Hill, February 2007	USACE
Environmental Condition of Property Update Report, Wilkes-Barre U.S. Army Reserve Center (PA099), Bethlehem, Pennsylvania, prepared by XCEL Engineering, Inc., May 2012	USACE
Final Report, Lead Abatement, US Army Reserve Center, Wilkes-Barre, PA, January 1994	99 th RSC
United States Army Reserve Center, Wilkes-Barre Facility, Luzerne County, PA, Underground Storage Tank Closure Report, July 1993	99 th RSC
Asbestos Visual Reinspection Report, July 2012	99 th RSC
Record of Environmental Consideration, September 2012	99 th RSC
Radiological Memo, June 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	2	Complete. In June 1993, a 1,000-gallon No. 2 heating oil UST was removed from the eastern side of the OMS building. Confirmation samples were collected and analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons – diesel range organics (TPH-DRO). No BTEX was detected in soil samples, but TPH-DRO ranged from 19 milligrams per kilogram (mg/kg) to 360 mg/kg. The UST Closure report was submitted to the Pennsylvania Department of Environmental Protection (PADEP) and attributed elevated TPH-DRO concentrations to coal residue in the sample. See Section 3.4 of the 2007 ECP Report for additional information. All environmental soil and/or groundwater investigation activities on the property have been completed.

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)

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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
USAR Center	No. 2 Fuel oil	1955 to 1993	<p>Complete. In June 1993, a 1,000-gallon No. 2 heating oil UST was removed from the eastern side of the OMS building. Confirmation samples were collected and analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX), and total petroleum hydrocarbons – diesel range organics (TPH-DRO). No BTEX was detected in soil samples, but TPH-DRO ranged from 19 milligrams per kilogram (mg/kg) to 360 mg/kg. The UST Closure report was submitted to the Pennsylvania Department of Environmental Protection (PADEP) and attributed elevated TPH-DRO concentrations to coal residue in the sample. See Section 3.4 of the 2007 ECP Report for additional information. All environmental soil and/or groundwater investigation activities on the property have been completed.</p>

ENCLOSURE 5

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:

A. 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.

B. 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.

C. 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"

1. 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.

2. 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.

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

B. HOLD HARMLESS

1. 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.

2. 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.

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

C. POST-TRANSFER DISCOVERY OF CONTAMINATION

1. 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.

2. 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, or the Grantor's indemnification obligations under applicable laws.

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 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 Grantee, its successor 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 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

22 June 2012

MEMORANDUM FOR RECORD

SUBJECT: Results from the Radiological Survey at the Wilkes-Barre U.S. Army Reserve Center (USARC) in Wilkes-Barre, Pennsylvania

1. On 22 June 2012, the final survey work for the radiological release at the Wilkes-Barre 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 8
ASBESTOS VISUAL REINSPECTION REPORT

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ASBESTOS INSPECTION REPORT



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

WILKES-BARRE
US ARMY RESERVE CENTER
WILKES-BARRE, PENNSYLVANIA

(USAR FACID: PA099 - SITE CODE: 42970)

July 2012

ASBESTOS INSPECTION REPORT



**WILKES-BARRE US ARMY RESERVE CENTER
(PA099) - (42970)
1001 HIGHWAY 315 SOUTH
WILKES-BARRE, 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 – WILKES -BARRE (PA099)
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 Wilkes-Barre US Army Reserve Center located at 1001 Highway 315 South in Wilkes-Barre, Pennsylvania. The inspections were conducted on 20 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 at this site included aircell piping thermal system insulation (TSI), mudded fitting TSI, 9" floor tiles and associated underlying mastic and a vault door.

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): Assumed friable and non-friable ACM in the form of piping & fitting TSI, floor tiles, floor tile mastics and vault door are located in this building. Confirmed ACM in the form of door caulking is also located in the building.

BUILDING 2 (Maintenance Shop): Assumed friable ACM in the form of piping & fitting TSI are located in this building.

US ARMY RESERVE CENTER – WILKES -BARRE (PA099)

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 – WILKES -BARRE (PA099)
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
6	9" brown floor tile/mastic	NF	2,950 SF	Good	Low	Under H-1 floor tile in Rooms 101, 102, 105, 106, 107, 109, 110A, 113, 117, 118, 120, 121, 203, 204, 205, 213, Entry E-001, Halls H-100, H-101, H-102 & H-200 & Stairway S-001	Assumed ACM (in checkerboard pattern w/H-7 tile)
7	9" tan floor tile/mastic	NF	2,760 SF	Good	Low	In checkerboard w/H-6 in Rooms 101, 102, 105, 106, 107, 109, 110A, 117, 118, 120, 121, 203, 204, 205, 213, Entry E-001, Halls H-100, H-101, H-102 & H-200 & Stairway S-001	Assumed ACM (In checkerboard pattern w/H-6)
8	White door caulking	NF	990 LF	Good	Moderate	Around all interior doors	Confirmed ACM
9	Vault door	NF	1 each	Good	Low	Room 104	Assumed ACM
10	Aircell piping insulation	F	600 LF	Damaged (10%)	Moderate	Rooms 110, 112, 119 and in pipe chases. (Quantity includes assumed amount of inaccessible material behind walls, ceilings & in pipe chases)	Assumed ACM
13	9" white floor tile/mastic	NF	190 SF	Good	Low	Room 113	Assumed ACM (In checkerboard pattern w/H-6)
15	Clothe covered mudded fitting insulation	F	50 SF (50 ftgs)	Damaged (10%)	Low	Rooms 110, 112, 119 and in pipe chases. (Quantity includes assumed amount of inaccessible material behind walls, ceilings & in pipe chases)	Assumed ACM

ASBESTOS MATERIAL SUMMARY TABLE

Building 2 - Maintenance Shop

HA#	Material Description	Friability	Total Quantity	Condition	Potential for Contact	Locations	Status
10	Aircell piping insulation	F	150 LF	Significantly Damaged (30 %)	High	Room 100	Assumed ACM
15	Clothe covered mudded fitting insulation	F	9SF (9 ftgs)	Significantly Damaged (25 %)	High	Room 100	Assumed ACM

STATE ASBESTOS INSPECTOR LICENSE

PENNSYLVANIA ASBESTOS CERTIFICATION

048996

Sex	Height	Eyes	Birth Date
M	5'09"	BLU	12/18/1953
Expires	Issue Date		
02/08/2013	03/09/2012		

Class
INSPECTOR

MARK MOLTZEN
337 MUIRFIELD PKWY
CHARLESTON SC 29414



Mark Moltzen

US ARMY RESERVE CENTER – WILKES -BARRE (PA099)
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 Wilkes-Barre, 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

**WILKES-BARRE
US ARMY RESERVE CENTER
WILKES-BARRE, PENNSYLVANIA
(USAR FACID: PA099 - SITE CODE: 42970)**

July 2012

WILKES-BARRE US ARMY RESERVE CENTER – WILKES-BARRE, PA
ASBESTOS INSPECTION REPORT

BUILDING 1: Main Administrative Building

1. DESCRIPTION:

Building 1 is an approximately 21,500 square foot (SF) concrete block structure with a brick and synthetic stucco-type exterior constructed in the 1960s. It has EPDM (rubber coated) roofing and is constructed on a concrete slab. The following information was identified during the inspection and from the analysis of samples taken:

- Seventeen suspect homogeneous areas were identified during the inspection and sampled to confirm or assumed.
- Six of the seventeen homogeneous areas were assumed to contain asbestos.
- One of the sampled suspected homogeneous areas was confirmed to contain asbestos.
- Ten of the suspected homogenous areas did not contain asbestos.

2. FINDINGS:

Eleven suspect homogeneous areas were sampled. A total of twenty-seven 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-8:** MISC., White door caulking is non-friable ACM in good condition with a moderate potential for disturbance. (Approx 990 LF)

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

- **H-6:** MISC, 9” brown floor tile & mastic is non-friable assumed ACM in good condition with low potential for disturbance. (Approx 2,950 SF)
- **H-7:** MISC, 9” tan floor tile & mastic is non-friable assumed ACM in good condition with low potential for disturbance. (Approx 2,760 SF)
- **H-9:** MISC., Vault door is non-friable assumed ACM in good condition with a low potential for disturbance. (1 each)

WILKES-BARRE US ARMY RESERVE CENTER – WILKES-BARRE, PA ASBESTOS INSPECTION REPORT

- **H-10:** TSI, Aircell piping insulation is damaged friable assumed ACM with moderate potential for disturbance. (Approx 600 LF)
- **H-13:** MISC, 9" white floor tile/mastic is non-friable assumed ACM in good condition with low potential for disturbance. (Approx 190 SF)
- **H-15:** TSI, Gray cloth-covered mudded fitting insulation is damaged friable assumed ACM with low potential for disturbance. (Approx 50 SF)(Approx 50 fittings)

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

- H-1: MISC, 12" white floor tile w/gray specks/mastic
- H-2: MISC, Black coving & mastic
- H-3: MISC, Dark brown window caulking
- H-4: MISC, Sheetrock/joint compound
- H-5: MISC, Ceiling tiles w/grooves & pinholes
- H-11: SURF, Plaster (Approx 2,300 SF)
- H-12: MISC, Tan carpet mastic
- H-14: MISC, Stair tread/mastic

3. OBSERVATIONS:

The noted quantities for TSI (H-10 & H-15) include estimated quantities that are inaccessible behind walls, ceilings and in the pipe trenches that are typical for this type of reserve center building. 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 abatement activities.

4. RECOMMENDED ABATEMENT ACTIONS:

Recommended actions for the following homogeneous areas:

- **H-6:** MISC, 9" brown floor tile/mastic: **O&M**
- **H-7:** MISC, 9" tan floor tile & mastic: **O&M**
- **H-8:** MISC., White door caulking: **O&M**
- **H-9:** MISC., Vault door: **O&M**
- **H-10:** TSI, Aircell piping insulation: **O&M/ Remove**
- **H-13:** MISC, 9" white floor tile/mastic: **O&M**
- **H-15:** TSI, Gray cloth-covered fitting insulation: **O&M/ Remove**

**WILKES-BARRE US ARMY RESERVE CENTER – WILKES-BARRE, PA
ASBESTOS INSPECTION REPORT**

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 in the ACM Summary Table 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 ACM locations.

**WILKES-BARRE US ARMY RESERVE CENTER – WILKES-BARRE, PA
ASBESTOS INSPECTION REPORT**

6. HOMOGENEOUS AREAS PHOTOGRAPHS:

	
<p>H-1 12" white floor tile/mastic (Non-ACM)</p>	<p>H-2 Black coving/mastic (Non-ACM)</p>
	
<p>H-3 Brown caulking (Non-ACM)</p>	<p>H-4 Sheetrock/joint compound (Non-ACM)</p>
	
<p>H-5 Ceiling tiles (Non-ACM)</p>	<p>H-6 9" brown floor tile/mastic (Assumed ACM)</p>

**WILKES-BARRE US ARMY RESERVE CENTER – WILKES-BARRE, PA
ASBESTOS INSPECTION REPORT**

6. HOMOGENEOUS AREAS PHOTOGRAPHS (Cont.):



**H-7 9" tan floor tile/mastic
(Assumed ACM)**



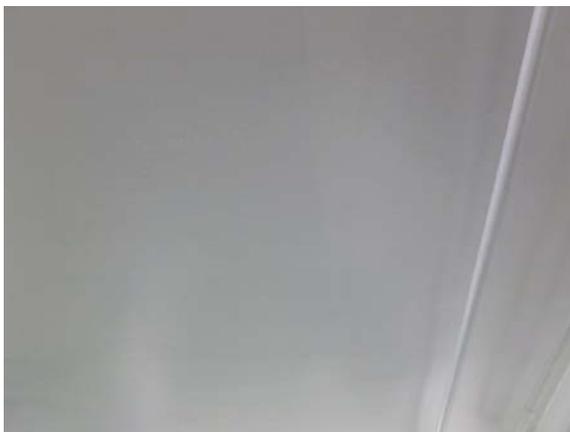
H-8 White door caulking (ACM)



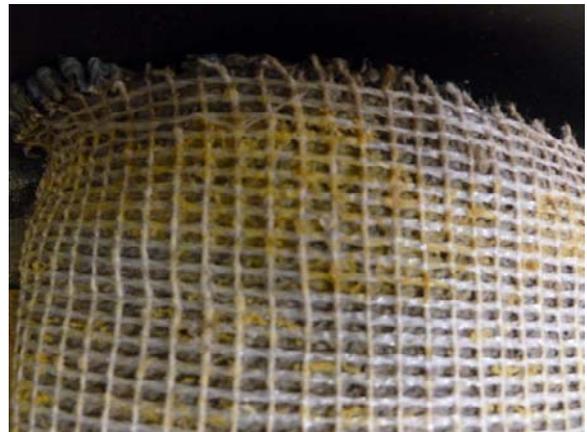
**H-9 Vault door (Assumed ACM)
(Typical)**



**H-10 Aircell piping TSI
(Assumed ACM)**



H-11 Plaster (Non-ACM)



H-12 Tan carpet mastic (non-ACM)

**WILKES-BARRE US ARMY RESERVE CENTER – WILKES-BARRE, PA
ASBESTOS INSPECTION REPORT**

6. HOMOGENEOUS AREAS PHOTOGRAPHS (Cont.):



**H-13 9" white floor tile/mastic
(Assumed ACM)**



H-14 Stair tread/mastic (Non-ACM)

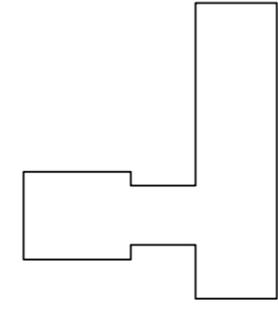


**H-15 Mudded fitting TSI
(Assumed ACM)**

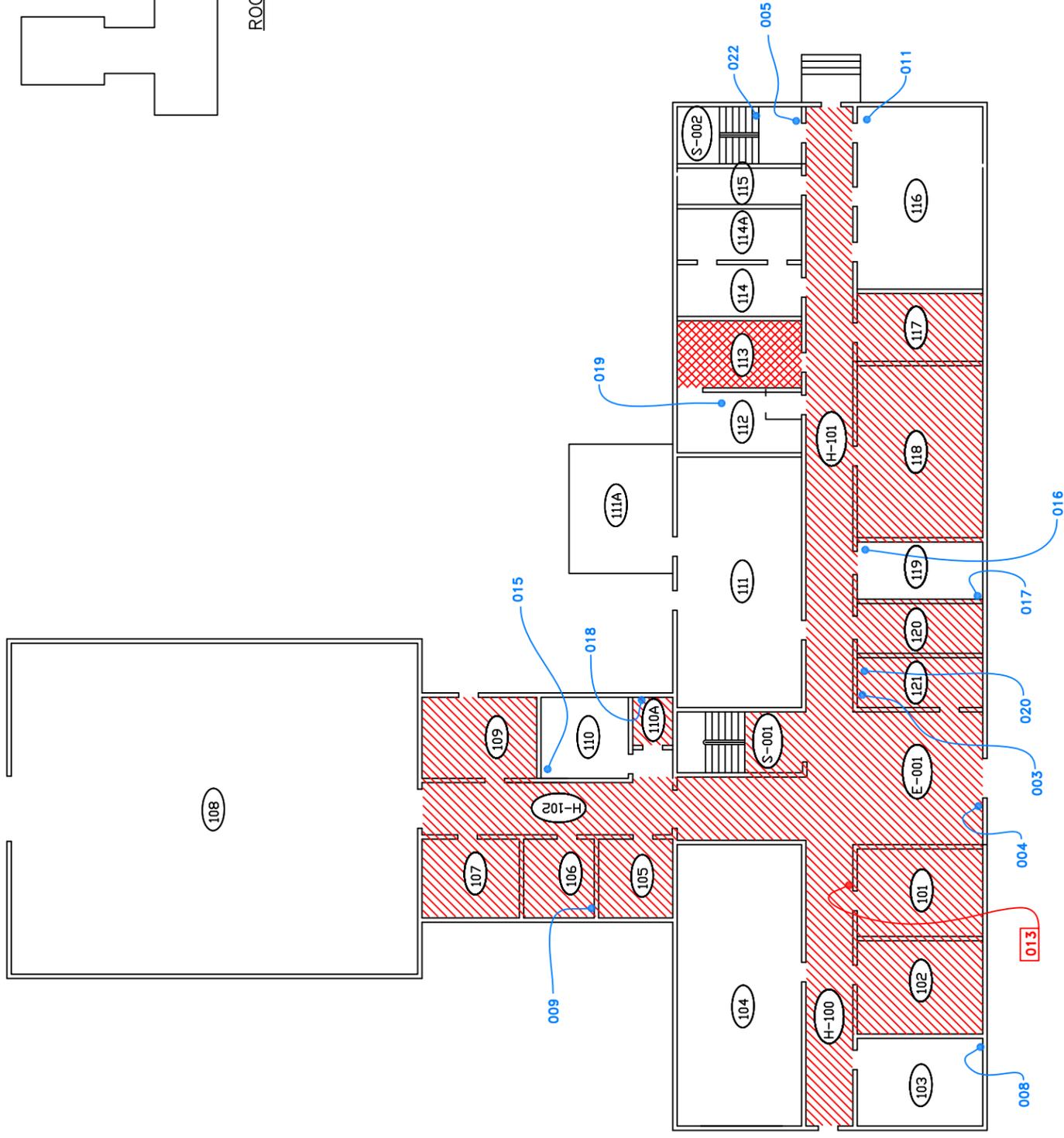
Intentionally

Left

Blank



ROOF



LEGEND

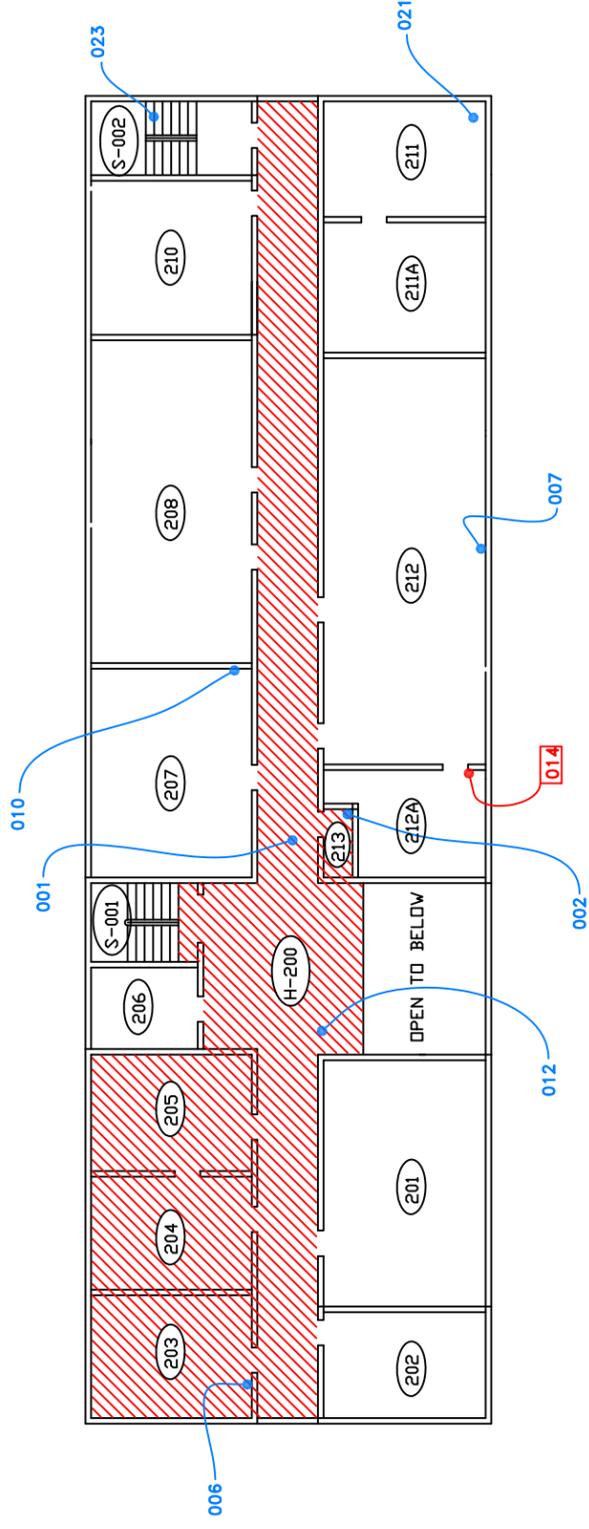
- (XXX) — Indicates unique room number assigned by inspector
- (XXX) — Indicates sample locations which tested positive for asbestos
- (Diagonal lines) — Indicates assumed 9" brown & 9" tan floor tiles/mastics in checkerboard pattern (H-6 & H-7)
- (Cross-hatch) — Indicates assumed 9" brown & 9" white floor tiles/mastics in checkerboard pattern (H-6 & H-13)

SBG-EEG

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

ASBESTOS SAMPLE LOCATIONS
 BUILDING 1, FIRST FLOOR
 ARC WILKES-BARRE (PA099)
 WILKES-BARRE, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
AUG 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER	SHEET	1 OF 3
NONE	SBG_PA099-B1FL1_07-2012		



LEGEND

- (XXX) — Indicates unique room number assigned by inspector
- XXX — Indicates sample locations which tested positive for asbestos
- ▨ — Indicates assumed 9" brown & 9" tan floor tiles/mastics in checkerboard pattern (H-6 & H-7)

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

ASBESTOS SAMPLE LOCATIONS
 BUILDING 1, SECOND FLOOR
 ARC WILKES-BARRE (PA099)
 WILKES-BARRE, PENNSYLVANIA

DATE	PREPARED BY	DRAWN BY	REV
AUG 2012	M. MOLTZEN	L. C. DIASIO	-
SCALE	DWG NUMBER	SHEET	2 OF 3
NONE	SBG_PA099-B1FL1_07-2012		



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

Asbestos Bulk Analysis Report

Report Number: 12-08-00142

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

Received Date: 08/01/2012
 Analyzed Date: 08/01/2012
 Reported Date: 08/06/2012

Project/Test Address: Army Reserve Center-Wilks-Barre; 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
12-08-00142-001A	ARC-W/B-001	Tile	White Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00142-001B	ARC-W/B-001	Mastic	Tan/Brown Adhesive; Inhomogeneous	NAD	1% Cellulose 99% Non-Fibrous
12-08-00142-002A	ARC-W/B-002	Tile	White Vinyl; Homogeneous	NAD	100% Non-Fibrous
12-08-00142-002B	ARC-W/B-002	Mastic	Brown Adhesive; Homogeneous	NAD	1% Cellulose 99% Non-Fibrous
12-08-00142-003A	ARC-W/B-003	Tile	White Vinyl; Homogeneous	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00142

Project/Test Address: Army Reserve Center-Wilks-Barre; BLDG #1

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00142-003B	ARC-W/B-003	Mastic	Tan/Brown Adhesive; Inhomogeneous	NAD	1% Cellulose 99% Non-Fibrous
12-08-00142-004A	ARC-W/B-004	Cove Base	Black Rubbery; Homogeneous	NAD	100% Non-Fibrous
12-08-00142-004B	ARC-W/B-004	Mastic	Tan Adhesive; Homogeneous	NAD	1% Cellulose 1% Synthetic 98% Non-Fibrous
12-08-00142-005A	ARC-W/B-005	Cove Base	Black Rubbery; Homogeneous	NAD	100% Non-Fibrous
12-08-00142-005B	ARC-W/B-005	Mastic	Tan Adhesive; Homogeneous	NAD	2% Cellulose 1% Synthetic 97% Non-Fibrous
12-08-00142-006A	ARC-W/B-006	Cove Base	Black Rubbery; Homogeneous	NAD	100% Non-Fibrous
12-08-00142-006B	ARC-W/B-006	Mastic	Tan/Brown Adhesive; Inhomogeneous	NAD	1% Cellulose 99% Non-Fibrous
12-08-00142-007	ARC-W/B-007		Brown Rubbery; Homogeneous	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00142

Project/Test Address: Army Reserve Center-Wilks-Barre; BLDG #1

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00142-008	ARC-W/B-008		Brown Rubbery; Homogeneous	NAD	100% Non-Fibrous
12-08-00142-009	ARC-W/B-009		Off-White Granular; White Powder; Tan Fibrous; Inhomogeneous	NAD	24% Cellulose 76% Non-Fibrous
12-08-00142-010	ARC-W/B-010		Off-White Granular; White Powder; Tan Fibrous; Inhomogeneous	NAD	23% Cellulose 77% Non-Fibrous
12-08-00142-011	ARC-W/B-011		Beige Fibrous; White Powder; Inhomogeneous	NAD	40% Cellulose 30% Fibrous Glass 30% Non-Fibrous
12-08-00142-012	ARC-W/B-012		Beige Fibrous; White Powder; Inhomogeneous	NAD	40% Cellulose 30% Fibrous Glass 30% Non-Fibrous
12-08-00142-013	ARC-W/B-013		Green/Off-White/White Chalky; Inhomogenous	Trace <1% Chrysotile	100% Non-Fibrous
				Total Asbestos: Trace <1%	
2% chrysotile present in green joint compound-like material.					
12-08-00142-014	ARC-W/B-014		Green/Off-White/White Chalky; Inhomogenous	Trace <1% Chrysotile	100% Non-Fibrous
				Total Asbestos: Trace <1%	
2% chrysotile present in green joint compound-like material.					

Environmental Hazards Services, L.L.C

Client Number: 42-4515

Report Number: 12-08-00142

Project/Test Address: Army Reserve Center-Wilks-Barre; BLDG
#1

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00142-015	ARC-W/B-015		White Chalky; Brown Granular; Inhomogenous	NAD	100% Non-Fibrous
12-08-00142-016	ARC-W/B-016		White Chalky; Gray Granular; Inhomogenous	NAD	100% Non-Fibrous
12-08-00142-017	ARC-W/B-017		White Chalky; Brown Granular; Inhomogenous	NAD	100% Non-Fibrous
12-08-00142-018	ARC-W/B-018		White Chalky; Brown Granular; Inhomogenous	NAD	100% Non-Fibrous
12-08-00142-019	ARC-W/B-019		White Chalky; Brown Granular; Inhomogenous	NAD	100% Non-Fibrous
12-08-00142-020	ARC-W/B-020		Brown Adhesive; Homogenous	NAD	100% Non-Fibrous
12-08-00142-021	ARC-W/B-021		Brown Adhesive; Homogenous	NAD	100% Non-Fibrous
12-08-00142-022	ARC-W/B-022		Brown Adhesive; Homogenous	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 42-4515
Project/Test Address: Army Reserve Center-Wilks-Barre; BLDG #1

Report Number: 12-08-00142

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
12-08-00142-023	ARC-W/B-023		Brown Adhesive; Homogenous	NAD	100% Non-Fibrous

QC Sample: 58-M22004-4, 10-M1-1993-3

QC Blank: SRM 1866 Fiberglass

Reporting Limit: 1% Asbestos

Method: EPA Method 600/R-93/116, EPA Method 600/M4-82-020

Analyst: Vickie Holmes, Laura Holder

Reviewed By Authorized Signatory:



Tasha Eaddy
QA/QC Clerk

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

23 PLM

SBES OS CHAIN OF CUSTODY FORM



FACILITY: Army Reserve Center – Wilks-Barre **BLDG #:** 1

INSPECTOR'S NAME(S): Mark Moltzen **DATE:** 7/20/12
(PRINT)

TOTAL NUMBER OF SAMPLES RELINQUISHED: 23

Sample Numbers: **Relinquished by / Date:** **Received by / Date:**

ARC-W/B-001 thru 023

Mark Moltzen 7/20/12

12-08-00142



ANALYSIS REQUIRED

- Bulk ID by PLM
- Asbestos Wipe
- Fiber Count (PCM)
- TEM Chatfield (B)
- TEM Air
- Other (specify) _____

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

Additional Information / Comments

Stop analysis on first positive reading per homogeneous material

PA samples
* NO TEM *

Notification of Results

Name: Mark Moltzen **Phone:** (843) 412-2086 **E-Mail:** moltzen@sbg-eeg.com

SBG Job #: 1241

SBG, INC
10179 Hwy 78
Ladson, SC 29456
(843) 879-0400
FAX (843) 879-0401

CXK7E0Inc-2010

J. Starn 8-1-12

ASBESTOS SAMPLE LOG



FACILITY: Army Reserve Center-Wilks-Barre BLDG #: 1

INSPECTOR NAME(S): Mark Moltzen (SC-23353) DATE: 7/10/12
(PRINT)

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

SAMPLE NUMBER	HOMO #	SAMPLE LOCATION (Room #, Floor #, Etc.)	SAMPLE DESCRIPTION
ARC-W/B-001	1	Hall H-200	12" white floor tile/mastic
ARC-W/B-002	1	Room 213	12" white floor tile/mastic
ARC-W/B-003	1	Room 121	12" white floor tile/mastic
ARC-W/B-004	2	Entry E-001	Black coving/mastic
ARC-W/B-005	2	Stairwell S-002	Black coving/mastic
ARC-W/B-006	2	Room 203	Black coving/mastic
ARC-W/B-007	3	Room 212	Brown caulking
ARC-W/B-008	3	Room 103	Brown caulking
ARC-W/B-009	4	Room 106	Sheetrock/joint compound
ARC-W/B-010	4	Room 207	Sheetrock/joint compound
ARC-W/B-011	5	Room 116	Ceiling tiles w/grooves & pinholes
ARC-W/B-012	5	Hall H-200	Ceiling tiles w/grooves & pinholes

ASBESTOS SAMPLE LOG



FACILITY: Army Reserve Center-Wilks-Barre BLDG #: 1

INSPECTOR NAME(S): Mark Moltzen (SC-23353) DATE: 7/10/12
(PRINT)

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

SAMPLE NUMBER	HOMO #	SAMPLE LOCATION (Room #, Floor #, Etc.)	SAMPLE DESCRIPTION
ARC-W/B-013	8	Room 101	White door caulk
ARC-W/B-014	8	Room 212A	White door caulk
ARC-W/B-015	11	Room 110	Plaster
ARC-W/B-016	11	Room 119	Plaster
ARC-W/B-017	11	Room 119	Plaster
ARC-W/B-018	11	Room 110A	Plaster
ARC-W/B-019	11	Room 112	Plaster
ARC-W/B-020	12	Room 121	Tan carpet mastic
ARC-W/B-021	12	Room 211	Tan carpet mastic
ARC-W/B-022	14	Stairwell S-002	Stair tread mastic
ARC-W/B-023	14	Stairwell S-002	Stair tread mastic

ASBESTOS BUILDING SUMMARY



BUILDING 2 – MAINTENANCE SHOP

**WILKES-BARRE
US ARMY RESERVE CENTER
WILKES-BARRE, PENNSYLVANIA
(USAR FACID: PA099 - SITE CODE: 42970)**

July 2012

BUILDING 2: Maintenance Shop

1. DESCRIPTION:

Building 2 is a 3,715 square-foot building constructed in the 1960S. It is a concrete block structure with a flat, tar & gravel roof. The following information was identified during the survey and from the analysis of the samples taken:

- Five homogeneous areas were identified during the inspection.
- Two assumed homogeneous areas found in Building 1 (H-10 & H-15) are also located in this building.
- One homogeneous area (H-3) is the same as found and sampled in Building 1 and is non-ACM, therefore was not sampled here.
- Two new suspect homogeneous areas (H-16 & H-17) were identified and sampled.
- Both newly-identified homogeneous areas do not contain asbestos

2. FINDINGS:

Two newly-identified homogeneous areas with suspected ACM were sampled and did not contain asbestos. 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 and sample locations.

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-3: MISC, Dark brown window caulking

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

- **H-10:** TSI, Aircell piping insulation is significantly damaged friable assumed ACM with high potential for disturbance. (Approx 150 LF)
- **H-15:** TSI, Gray cloth-covered fitting insulation is significantly damaged friable assumed ACM with high potential for disturbance. (Approx 9 SF)(Approx 9 fittings)

**WILKES-BARRE US ARMY RESERVE CENTER – WILKES-BARRE, PA
ASBESTOS INSPECTION REPORT**

3. OBSERVATIONS:

The piping & fitting TSI located in this building is significantly damaged and should be removed as soon as possible. The inspector sprayed an encapsulant on the accessible TSI as a temporary measure during the inspection. 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 abatement activities.

4. RECOMMENDED ABATEMENT ACTIONS:

Recommended actions for the following homogeneous areas:

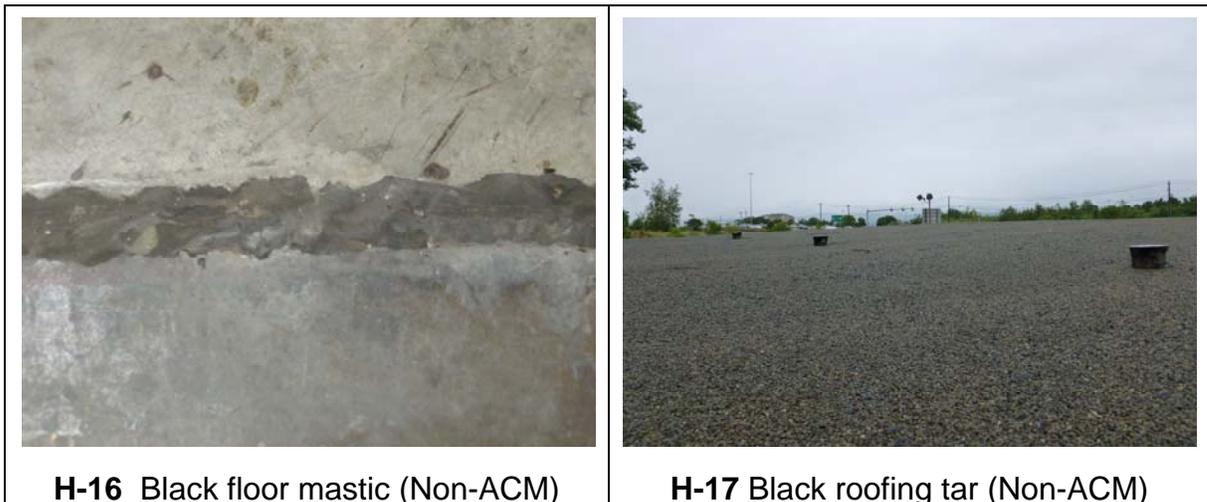
- **H-10:** TSI, Aircell piping insulation: **Remove**
- **H-15:** TSI, Gray cloth-covered fitting insulation: **Remove**

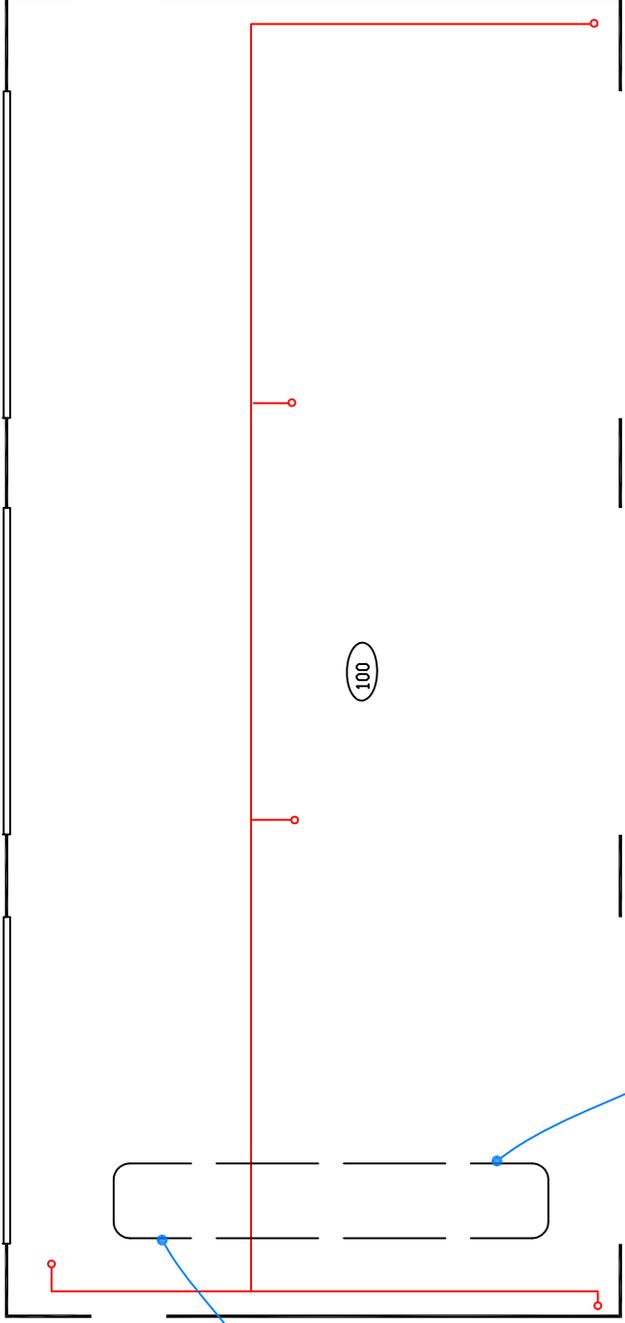
5. RECOMMENDATIONS FOR OPERATIONS & MAINTENANCE:

Operations and Maintenance recommendations for confirmed and assumed homogeneous areas of ACM should be maintained in an Operations & Maintenance Plan. The materials listed in the ACM Summary Table 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 ACM locations.

6. HOMOGENEOUS AREAS PHOTOGRAPHS:





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

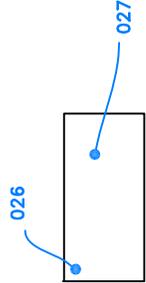
ASBESTOS SAMPLE LOCATIONS
 BUILDING 2
 ARC WILKES-BARRE (PA099)
 WILKES-BARRE, PENNSYLVANIA

DATE	AUG 2012	PREPARED BY	M. MOLTZEN	DRAWN BY	L. C. DIASIO	REV	-
SCALE	NONE	DWG NUMBER	SBG_PA099-B2_07-2012	SHEET		3 OF 3	

LEGEND

- (XXX) — Indicates unique room number assigned by inspector
- XXX — Indicates sample locations which tested positive for asbestos
- — Indicates assumed piping & fitting insulation (H-10 & H-15)

ROOF





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

Asbestos Bulk Analysis Report

Report Number: 12-08-00139

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

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

Project/Test Address: Army Reserve Center-Wilks-Barre; Bldg #2

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
12-08-00139-001	ARC-W/B-024		Black/Gray Rubbery; Inhomogeneous	NAD	100% Non-Fibrous
12-08-00139-002	ARC-W/B-025		Black/Gray Rubbery; Inhomogeneous	NAD	100% Non-Fibrous
12-08-00139-003	ARC-W/B-026		Black Tar-Like; Homogeneous	NAD	100% Non-Fibrous
12-08-00139-004	ARC-W/B-027		Black Tar-Like; Homogeneous	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 42-4515
Project/Test Address: Army Reserve Center-Wilks-Barre; Bldg #2

Report Number: 12-08-00139

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
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QC Sample: 58-M22004-4
QC Blank: SRM 1866 Fiberglass
Reporting Limit: 1% Asbestos
Method: EPA Method 600/R-93/116, EPA Method 600/M4-82-020
Analyst: Vickie Holmes



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

4 PLM

ASBESTOS CHAIN OF CUSTODY FORM



FACILITY: Army Reserve Center - Wilks-Barre BLDG #: 2

INSPECTOR'S NAME(S): Mark Moltzen DATE: 7/20/12
(PRINT)

TOTAL NUMBER OF SAMPLES RELINQUISHED: 4

Sample Numbers;	Relinquished by / Date;	Received by / Date;
<u>ARC-W/B-024 thru 027</u>	<u>MA Moltzen 7/30/12</u>	

ANALYSIS REQUIRED

- Bulk ID by PLM
- Asbestos Wipe
- Fiber Count (PCM)
- TEM Chatfield (Bu)
- TEM Air
- Other (specify)



12-08-00139

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

✓

Additional Information / Comments

PA Samples
Stop analysis on first positive reading per homogeneous material *NO TEM*

Notification of Results

Name: Mark Moltzen Phone: (843) 412-2086 E-Mail: moltzen@sbg-eeeg.com

SBG Job #: 1241

SBG, INC
10179 Hwy 78
Ladson, SC 29456
(843) 879-0400
FAX (843) 879-0401

COCEEGLnc-2010

J. Sloan

8-1-12

ENCLOSURE 9

REGULATORY/PUBLIC COMMENTS & ARMY RESPONSE

Will be updated after Public Comment.

- 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 commented _____
- The Draft FOST was sent to US EPA Region 2 on _____. EPA commented _____
- Army response to comments _____