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MEMORANDUM

TO: File

FROM: S. Franch, Environmental Chemist, NC Superfund Section
S. Franch

DATE: May 16, 2005

SUBJECT: Status of U.S. Army Reserve Centers in North Carolina

SITE: USA Reserves XVIII Airborne Corps Sites in North Carolina (see attached email, dated 5-12-05, with list of sites)

Summary from telecommunications of April 7 and May 5, 2005 with Michelle Hook (803 751-6757). She is the Environmental Manager that oversees the reserve centers in both North and South Carolina. Ms. Hook is a contractor to the US Army 81st Regional Readiness Command (RRC), Installation Management, employed by Bregman & Company and based in Fort Jackson, SC. The RRC's environmental division chief is Mr. Steven Francis (205 912-6957) who is based in Alabama.

Michelle Hook has visited all of the NC sites in the capacity of an environmental auditor. She has been in this position since 1999 and doesn't have many records prior to 1992. Prior to 1992, military bases were not required to comply with local environmental regulations or keep records of spent solvents, nor did they have an Environmental Program. They did have guidelines on handling of hazardous substances such as Army Regulations 200-1 and 200-2. The Federal Facilities Compliance act was passed in 1992 that required the military to abide by local regulations and keep records of spent chemicals. All of these reserve centers are conditionally exempt from RCRA.

As auditor she examines the sites for dead vegetation, inquires about any spills, reviews handling procedures for various solvents and reviews their recycling program. The Defense Reutilization Marketing Office (DRMO) manages recyleable and non-recycled generated products at military installations. This program selects a contractor to retrieve and redistribute for reprocessing or reuse as a fuel additive in boilers elsewhere. All spent solvents (used oil, antifreeze, lubricants, and batteries) are collected by a contractor (Safety Kleen) and transported off site. The contractor also removes such items as any leftover paint cans, oil soaked vermiculite, and greasy rags.

The original administrator of these centers --Director of Engineering and Housing-- was based under the 18th Airborne Corps at Fort Bragg. None of the reserve centers have gasoline pumps on site. Fuel is obtained at nearby civilian gas stations and nearby military installations. All of the centers had heating oil tanks, mainly above

ground. These have been removed during the conversion to natural gas. Both the Hickory (NC6 210 021 626) and the Wilmington (NC0 210 021 929) centers had underground storage tanks for heating oil. Contractors that removed the oil tanks would determine whether samples should be obtained if they saw any suspected leaks or soil discoloration. Several of the centers have only administration buildings with no facilities for vehicle maintenance. None of the centers were on well water. Because the reserve centers are mostly located within the city, all are connected to city sewers.

Two of the centers are in the process/or have been sold. These are the Greenville center (NC8 210 022 044) and the Durham Center (NC9 210 022 787) on Foster Street. The Greenville center is undergoing an EBS (Environmental Baseline Study) prior to being sold. The Durham Center on Foster Street has been sold to the City of Durham. A Durham Reserve Center still remains on Carol Street (NC4 210 021 891).

The Rocky Mount center (NC8 210 021 624) had a non-reportable quantity spill of hydraulic fluid. The Morehead City Reserve center (NC5 210 022 906) has been undergoing a site investigation. This was initiated since there had been construction plans to add more piers to accommodate additional landing boats. This project has been delayed following September 2001. This harbor area had been used for shipbuilding periodically since the 1860s.

Attachment: Email from Michelle Cook dated 5-12-05 (USA Reserve Centers in NC).

Subject: Status of NC USAR Centers listed on CERCLIS
From: "Hook, Michelle Ms 81 RRC INSTL MGMT" <michelle.hook@usar.army.mil>
Date: Thu, 12 May 2005 15:50:36 -0400
To: <serafino.franch@ncmail.net>

Mr. Franch,

Below is a brief description of NC USAR facilities you inquired about. Some of the facilities are administrative facilities only and have never had any vehicle maintenance activities conducted on site. Some of the facilities have small vehicle maintenance shops that handle minor maintenance activities and there is one that is a larger vehicle maintenance shop which handles minor and major maintenance activities. With reference to the administrative-only facilities, I cannot explain the rationale of the Environmental Manager before me obtaining EPA ID numbers for these sites since these facilities do not generate any HW. However, the paperwork was submitted to NCDENR and EPA ID numbers were generated for these facilities. Please note all USAR Centers in NC are classified as CESQG.

The 81st RRC has an Environmental Regulation in place that details how HM items should be stored and how HW items are to be properly disposed. Facility personnel are also required to inform the Environmental Division of any spills of petroleum products. You had asked for copies of Preliminary Assessments for each of these facilities yet I was only able to locate the PA for one, NC6210022905. This is the location of the larger vehicle maintenance shop and I assume the person that held my position during that time period understood the requirement to only involve that type of facility and not facilities that have the smaller vehicle maintenance shops or the administrative-only facilities.

1. NC6210022046. The Jesse F. Niven USAR Center, constructed in 1958, is situated on a 3.92-acre parcel located at 1816 East Main Street, Albemarle NC 28001. The center consists of a 11,392 ft² training and assembly building and a 2,619 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. One 500-gallon heating oil UST was removed on 28 September 1994 by Environmental Technology of North America, Inc. The Closure Report was submitted to the NCDENR 27 December 1994. Heating oil USTs are not regulated in the state of North Carolina and no additional documentation from the state is available. No Preliminary Assessment was completed for this facility.

2. NC4210020042. The Walter Hatch Lee USAR Center, constructed in 1950, is situated on a 9-acre parcel located at 224 Louisiana Avenue, Asheville NC 28806. The center consists of a 29,164 ft² training and assembly building and a 2,300 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the vehicle maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. No Preliminary Assessment was completed for this facility.

3. NC7210022045. The Miller Duckett USAR Center, constructed in 1959, is situated on a 4.06-acre parcel located at 306 East French Broad Avenue, Brevard NC 28712. The center consists of a 4,316 ft² training and assembly building, a 4,000 ft² utility building used for training and supply storage and a 1325 ft² vehicle maintenance shop. No maintenance activities are conducted in the maintenance shop, the building is used for storage. No Preliminary Assessment was completed for this facility.

4. NC6210022905. The Charlotte USAR Center and Area Maintenance Support Activity (AMSA) 122(G) is situated on a 14-acre parcel located at 1330 Westover Street, Charlotte NC 28205. The USAR Center consists of three training and assembly buildings; a 28,402 ft² two story building, a 23,287 ft² two story building, and an 8,180 ft² one story building. There is also a 7,598 ft² vehicle maintenance shop that is utilized by the AMSA 122(G). The AMSA 122(G) performs minor and major vehicle maintenance activities on military equipment. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. Attached is a copy of the 14 June 1990 Preliminary Assessment.

5. NC9210022787. The Durham #2 USAR Center, constructed in 1928, was situated on a 0.9-acre parcel located at 724 Foster Street, Durham NC 27701. The center consisted of a 29,918 ft² two story training and assembly building. No maintenance activities were performed at the facility, it was an administrative facility only. No Preliminary Assessment was completed for this facility. The facility was transferred to the City of Durham in 2002.

6. NC4210021891. The Durham #1 USAR Center, constructed in 1962, is situated on a 5.5-acre parcel located at 1228 Carroll Street, Durham NC 27707. The center consists of 15,624 ft² two story training and assembly building, a 3,500 ft² utility building and a 3,800 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. No Preliminary Assessment was completed for this facility.

7. NC4210022907. The BG James Moore USAR Center, constructed in 1974, is situated on a 5-acre parcel located at 2017 West Garner Road, Garner NC 27529. The center consists of a 21,550 ft² training and assembly building, a 3,500 ft² utility building and a 2,160 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. No Preliminary Assessment was completed for this facility.

8. NC9210021755. The E. Earle Rives AFRC, constructed in 1955, is situated on a 4.41-acre parcel located at 1120 North Church Street, Greensboro NC 27401. The center consists of a 16,500 ft² training and assembly building, two 5,000 ft² storage buildings and a 1,100 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1993 that indicate no signs of contamination. A 1000-gallon heating oil UST was removed in 1991 when the facility converted to natural gas. No Preliminary Assessment was completed for this facility.

9. NC0690308242 (NC8210022044 associated with 1391 North Memorial Drive). The Preston C. Clark USAR Center, constructed in 1958, is situated on a 3-acre parcel located at 1301 North Memorial Drive, Greenville NC 27834. The center consists of a 10,850 ft² training and assembly building, a 3,500 ft² utility building and a 3,390 ft² vehicle maintenance shop. The facility was vacated March 2004 when the units assigned to the facility transferred to another USAR Center. While the facility was still occupied, only minor maintenance activities such as oil changes were conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1994 that indicate no signs of contamination. A 1,000-gallon and a 2,000-gallon underground storage tank that housed heating oil were removed in 1990. They were replaced by a 600-gallon AST that also housed heating oil. The facility converted to natural gas in the mid 1990's and the 600-gallon AST, which is empty, remains on site. No Preliminary Assessment was completed for this facility.

10. NC6210021626. The D. W. Hudson USAR Center, constructed in 1998, is situated on a 3.21-acre parcel located at 1500 12th Street Drive NW. The old training and assembly building constructed in the 1950's was demolished in 1996 to allow for remediation activities to proceed and to eventually make way for the present day USAR Center. Remediation activities were necessary due to a leaking UST. EnviroSpec Inc. removed a 500-gallon heating oil UST and a 1500-gallon heating oil UST on 12 December 1990. Contamination resulted from leaks in the 500-gallon tank and the NCDENR issued an NOV on 15 February 1991. The final Limited Site Assessment (LSA) Report, dated 13 August 1999 was submitted to NCDENR and at that time the 81st Regional Readiness Command requested a NFA finding. The NCDENR issued a NFA letter 19 November 1999. Attached is a copy of the LSA. Presently the center consists of a 4,500 ft² training and assembly building, a utility building and a 1,825 ft² vehicle maintenance shop. No maintenance activities are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of newly identified contamination. No Preliminary Assessment was completed for this facility

11. NC3210022486. The High Point USAR Center, constructed in 1960, is situated on a 3.8-acre parcel located at 156 East Parris Avenue, High Point NC 27262. The center consists of a 3,700 ft² training and assembly building, a 5,000 ft² storage building and a 1,100 ft² vehicle maintenance shop. The facility is an administrative facility only, no maintenance activities are conducted in the maintenance shop and the building is used as a storage building. No Preliminary Assessment was completed for this facility.

12. NC9210022043. The Thomas Erwin Allen USAR Center, constructed in 1989, is situated on a 3.1-acre parcel located at 1400 Carthage Road, Lumberton NC 28358. The center consists of a 14,380 ft² training and assembly building and a 1,325 ft² vehicle maintenance shop that was constructed in 1959. The facility is an administrative facility only, no maintenance activities are conducted in the maintenance shop and the building is used as a storage building. When the previous USAR Center located at this site, a 4,316 ft² building, was demolished in 1989 to allow for the construction of a larger facility, a 1000-gallon UST that housed fuel oil was removed from the site. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. No Preliminary Assessment was completed for this facility.

13. NC9210020732. The Otis Gray Rucker USAR Center, constructed in 1962, is situated on a 4.14-acre parcel located at 3115 Western Boulevard, Raleigh NC 27606. The center consists of a 22,180 ft² training and assembly building, a 3,500 ft² storage building and a 3,854 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. No Preliminary Assessment was completed for this facility.

14. NC8210021624. The Rocky Mount USAR Center, constructed in 1956, is situated on a 5.2-acre parcel located at 804 Fairview Road, Rocky Mount NC 27801. The center consists of 16,700 ft² training and assembly building and a 3,400 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1993 that indicate no signs of contamination. Four Seasons Industrial Services, Inc. removed a 1500-gallon heating oil UST in FY90. Contamination resulted from leaks in the tanks. Remediation was completed and a Phase I Environmental Investigation Report dated March 1993 was submitted to NCDENR and the 81st Regional Readiness Command requested a finding of NFA at that time. The NCDENR issued a letter 15 July 1996 stating the site had been classified at the lowest priority level and NFA was required. No Preliminary Assessment was completed for this facility.

15. NC5210022047. The Uriah G. Lucas USAR Center, constructed in 1960, is situated on a 5.03-acre parcel located at 1835 Jake Alexander Boulevard, Salisbury NC 28144. The center consists of a 14,286 ft² training and assembly building, a 500 ft² storage building and a 2,528 ft² vehicle maintenance shop. Minor

maintenance activities such as oil changes are conducted at the maintenance shop. Numerous internal inspections have been conducted at the facility dating back to 1992 that indicate no signs of contamination. No Preliminary Assessment was completed for this facility.

16. NC0210021929. The Adrian B. Rhodes AFRC, constructed in 1959, is situated on a 4.3-acre parcel located at 2144 West Lakeshore Drive, Wilmington NC 28401. The center consists of 25,200 ft² training and assembly building, a 3,500 ft² storage building and a 3,700 ft² vehicle maintenance shop. Minor maintenance activities such as oil changes are conducted at the maintenance shop. Two 1000-gallon heating oil USTs, one 2000-gallon heating oil UST and one 5000-gallon heating oil UST were removed 1993 by Environmental Technology of North America, Inc. The Closure Report indicated contamination had resulted from leaks in the tanks. Remediation was completed and a Soil Cleanup Report dated 30 September 2000 (attached) was submitted to the NCDENR, at which time the 81st Regional Readiness Command requested a finding of NFA. The NCDENR issued a finding of NFA as documented in a letter dated 6 April 2001. Numerous internal inspections have been conducted at the facility dating back to 1994 that indicate no signs of contamination. No Preliminary Assessment was completed for this facility.

Please let me know if you need additional information on any of these sites.

Michelle Hook, CHMM
81st RRC Environmental Manager
Office: 803.751.6757
Mobile: 803.319.8900



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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HAZARDOUS WASTE SECTION

Commander
Directorate of Engineering and Housing
Attention: AFZA-DE-RJ (Mr. Robert Turner)
Fort Bragg, NC 28307

RE: Updating Preliminary Assessments for the Revised
Hazard Ranking System
U. S. Army Reserve Centers

Dear Sir:

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), requires the U.S. Environmental Protection Agency (EPA) to establish a Federal Agency Hazardous Waste Compliance Docket to provide information on the status and compliance of federal facilities that may have releases of hazardous substances. Section 120 specifically addresses federal agency compliance with requirements on response actions, site evaluations, and hazard ranking procedures for facilities on the Docket. The U. S. Army Reserve Centers on the enclosed list are on the Docket.

EPA Region IV is currently contacting each federal facility on the Docket but not on the National Priorities List (NPL) to request updated information required by the revised Hazard Ranking System (HRS2) of the National Contingency Plan (NCP), which became effective March 14, 1991. Our records indicate that a Preliminary Assessment (PA) report or its equivalent was submitted previously for the reserve centers and that it was determined that no further action was needed at that time. We are writing to request updated information on any releases of hazardous substances that may have occurred or been discovered since that time.

We are enclosing the basic guidelines for a Preliminary Assessment. If the EPA determines from the updated PA information that a release has occurred or there is a potential for release, we may require further investigation later in the form of a Site Inspection (SI). We are also enclosing guidelines on the requirements of HRS2, generally to be utilized following an SI; however, we are not requesting that level of investigation at this time. Both PA and SI are defined in the NCP (40 CFR 300).

We are requesting submittal of the updated PA information within 60 days of receipt of this letter. If that is not feasible, we request submittal of a timetable for compliance within 30 days of receipt of this letter.

If you have questions regarding the updating of PA information, please contact Mr. J. C. Meredith of this office at (404) 347-3016.

Sincerely yours,

James H. Scarbrough
James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

Enclosure

cc: Mr. William L. Meyer, Director
Division of Solid Waste Management
North Carolina Department of Environment,
Health & Natural Resources
Post Office Box 27687
Raleigh, NC 27611-7687

Commander
U. S. Army Toxic & Hazardous Materials Agency
CETHA-IR-S (Conrad Swann)
Aberdeen Proving Ground, MD 21010-5401

cc: Jack Butler
Superfund

HRS2 UPDATES FOR NORTH CAROLINA

STATE	FACILITY NAME	PRIMARY AGENCY	SECONDARY AGENCY
NC	ALBERMARLE ARMY RESERVE	DOD	DOA
NC	ASHEVILLE ARMY RESERVE	DOD	DOA
NC	BREVARD ARMY RESERVE	DOD	DOA
NC	CHARLOTTE ARMY RESERVE	DOD	DOA
NC	DURHAM ARMY RESERVE #1	DOD	DOA
NC	DURHAM ARMY RESERVE #2	DOD	DOA
NC	FORT BRAGG ARMY RESERVE	DOD	DOA
NC	GARNER ARMY RESERVE	DOD	DOA
NC	GREENSBORO ARMY RESERVE	DOD	DOA
NC	GREENVILLE ARMY RESERVE	DOD	DOA
NC	HICKORY ARMY RESERVE	DOD	DOA
NC	HIGH POINT ARMY RESERVE	DOD	DOA
NC	LUMBERTON ARMY RESERVE	DOD	DOA
NC	MOREHEAD CITY ARMY RESERVE	DOD	DOA
NC	RALEIGH ARMY RESERVE	DOD	DOA
NC	ROCKY MOUNT ARMY RESERVE	DOD	DOA
NC	SALISBURY ARMY RESERVE	DOD	DOA
NC	WILMINGTON ARMY RESERVE	DOD	DOA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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345 COURTLAND STREET
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SUPERFUND SECTION

4WD-RCRA & FF

Colonel K.W. Crissman
Director of Engineering & Housing
Headquarters, XVIII Airborne Corps & Fort Bragg
Fort Bragg, North Carolina 28307-5000

Re: Preliminary Assessments
U.S. Army Reserve Centers in North Carolina

Dear Colonel Crissman:

The Preliminary Assessment forms for potential hazardous waste sites at U.S. Army Reserve Centers in North Carolina, submitted by letter of June 21, 1990, have been reviewed by the U.S. Environmental Protection Agency. Based upon the information submitted and a telephone verification by Mr. William A. Kern of your Directorate, we have concluded that no further action is needed at this time.

If any releases of hazardous substances to the environment should occur in the future or any information on any past releases should be found, these should be reported to EPA. If you have questions concerning this review, please contact Mr. J.C. Meredith, P.E., Remedial Project Manager, at (404) 347-3016.

Sincerely yours,


James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

cc: Lee Crosby, NCDEHNR