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Site Name (Subject):

USA RESERVE XVIII AIRBORNE CORPS

Site ID (Document ID):

NC0210021929

Document Name (DocType):

Correspondence (C)

Report Segment:

Description:

General Correspondence, 1990 - 2005

Date of Document:

8/12/2005

Date Received:

Box: *Enter SF and # with no spaces*

SF10,639

Access Level:

PUBLIC

Division:

WASTE MANAGEMENT

Section:

SUPERFUND

Program (Document Group):

SERB (SERB)

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North Carolina Department of Environment and Natural Resources

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Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

August 12, 2005

Ms. Jennifer Wendel
Superfund Site Evaluation Section
US EPA Region IV Waste Division
61 Forsyth Street SW, 11th Floor
Atlanta, GA 30303

Subject: Preliminary Assessment II (PA II)
USA Reserve XVIII Airborne Corps.
Wilmington, New Hanover County, NC
US EPA ID: NC0 210 021 929

Dear Ms. Wendel:

Enclosed is the Preliminary Assessment II (PA II), completed by the North Carolina Department of Environment and Natural Resources (NCDENR), Superfund Section for the USA Reserve XVIII Airborne Corps Site located just south of downtown Wilmington alongside Greenfield Lake, New Hanover County, NC. The NC Superfund Section recommends that this site be assigned a No Further Remedial Action Planned status under CERCLIS.

Under the authority of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), and the Superfund Amendments and Reauthorization Act of 1986 (SARA), the North Carolina Superfund Section conducted this PA II to evaluate updated data regarding environmental conditions at the site in order to determine the need for any further CERCLA action. Information about the site was obtained through the review of available file documents and interviews with US Army personnel and contractors who manage the site.

The USA Reserve XVIII Airborne Corps Site (AKA Adrian B. Rhodes Reserve Center) in Wilmington, NC is located on 2144 West Lake Shore Drive, Wilmington, NC 28401. This location is directly south of the old historic district of downtown Wilmington, at the southwest corner of the intersection with Stadium Drive (Ref. 1).

Corresponding geographic coordinates for the facility are 34.204946 north latitude and 77.935464 west longitude (Ref. 2). This site consists of a 4.3-acre parcel with an approximate 25,000 square foot training and assembly building, a 3,500 square

foot storage building and a 3,700 square foot vehicle maintenance shop (Ref. 3). The surrounding area to the north and south is predominantly residential property (Ref. 1). A baseball stadium is located adjacent to the site's western perimeter. The site's eastern perimeter parallels Lake Shore Drive that is on the banks of Greenfield Lake (Ref. 1).

This center has been active since its construction in 1959. Vehicle maintenance procedures such as oil changes, antifreeze changes, axle lubrication, and battery replacements were reportedly performed at this site. No major spills were reported for this center. This center uses city water and city sewers (Ref. 3). A Preliminary Assessment was completed in August of 1990 (Ref. 4). A request for updated information was submitted by EPA in order to complete the revised Hazard Ranking System in August of 1991 (Ref. 5). This PA II is intended to serve as the response to that request.

Documents regarding the site's regulatory history were found dating back to about 1985. This center is classified as a conditionally exempt small quantity generator by the NC Hazardous Waste Section. All spent petroleum products are temporarily stored on the premises and are removed by a commercial contractor and transported off-site for reclamation. This center is periodically inspected by a contractor of the Department of the Army to insure compliance with the military's Environmental Regulation regarding the storage and proper disposal of hazardous waste (Ref. 3).

Four heating oil underground storage tanks ranging in volume from 1000 to 5000 gallons were removed in 1993. A 2,000-gallon tank had leaked and contaminated soil and groundwater with volatile and semi-volatile organic compounds under the lawn at the north wall of the training building (Ref. 6, Figure 2). A site assessment that delineated the contamination was completed by the U.S. Army Corps of Engineers (USACE) in 1994. A maximum concentration of 133 ppm of Total Petroleum Hydrocarbons was detected in soil borings. Further assessments were completed by this group through 1996 that included a Corrective Action Plan to remediate the site. A seven foot depth excavation was completed with the removal of over 500 cubic yards of contaminated soil by December of 1997. This soil was transported to a disposal facility.

Post remediation confirmation sampling was conducted by the USACE in August of 2000 to insure that the soil was free of petroleum contamination (Ref. 6). Analytical samples indicated that there was no detectable petroleum-related organic compounds in the soil. Volatile organic compounds were still present in five of the seven monitoring wells. Well depths ranged from 9 to 16 feet below grade (Ref. 6).

However, it was evident that contaminant levels followed a declining trend when comparing to the previous sampling events. Naphthalene levels (30-40 ppb) in MWs 1, 3, and 8 remained nearly twice above the NC groundwater standards (Ref. 6). 2-Methylnaphthalene in four of the wells also remained above NC groundwater standards (Ref. 6). None of the declining residual volatiles were above federal health benchmarks. Table 1 below illustrates the declining results.

Table 1. Comparison of Groundwater Contaminant Levels from 1996-2000.
Units = ug/liter (ppb)

Sample ID	Analyte	Results			Benchmarks	
		August 2000	April 1996	Jan. 1996	Federal SCDM+	NC 2L standards++
MW-1	Naphthalene	43	67	Free product	1,500	21
	Ethylbenzene	4.4	8.9	Free product	700	29
	Toluene	1.3	8.6	Free product	1,000	1,000
	Xylenes, total	26.2	58	Free product	10,000	530
MW-3	Naphthalene	32	89	120		
	Ethylbenzene	1.2	7.3	17		
	Xylenes, total	14	49	100		
MW-8	Naphthalene	34	18	59		
	Ethylbenzene	5.3	7.9	7.5		
	Xylenes, total	15.9	39	31		
MW-9	Naphthalene	14	47	180		
	Ethylbenzene	2.2	29	32		
	Xylenes, total	ND	22	79		
MW-10	Naphthalene	17	ND	24		
	Ethylbenzene	8.6	5.3	5.8		
	Xylenes, total	63.4	43	33		

Bold values indicate most recent data above health benchmark. ++ = NC Aquifer Protection Section 2L Standards. + = The Superfund Chemical Data Matrix Screening Concentration

A No Further Action letter was granted by the NC UST Section in April 2001 with the provision that the area of contaminated groundwater cannot be used as a water

Ms. Wendel
June 16, 2005
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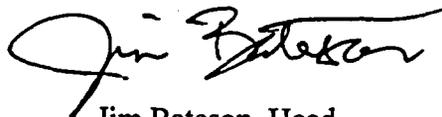
supply unless levels fall below NC health benchmark 2L standards (Ref. 7). No other incidents or regulatory actions are currently known regarding this site.

Current information indicates that the site's operations have been limited to the generation of small quantities of spent petroleum products. The volatiles due to the heating oil tank leak that contaminated the groundwater appear to be attenuating. Only naphthalene and 2-methylnaphthalene remained above NC 2L health benchmark standards based on the analytical data from the August 2000 sampling event. There are no detectable residual petroleum compounds in the soils. There are no known groundwater users in the surrounding area. A review of the Wilmington Water Distribution System indicates that the entire one-mile radius area around the site is served by city water. This water originates from the Cape Fear River at a location 20 miles north of the city. Based on these known facts, the NC Superfund Section recommends that this site be assigned a No Further Remedial Action Planned status under CERCLIS. If you have any questions about this PA II, please call Serafino Franch at (919) 508-8455, or by email at serafino.franch@ncmail.net.

Sincerely,



Serafino Franch
Environmental Chemist
NC Superfund Section



Jim Bateson, Head
Site Evaluation and Removal Branch
NC Superfund Section

cc: File
Charlotte Jesneck (letter only)

Attachments: APA Checklist
New Hanover County GIS Property Aerial Image (taken 2002) (Reference 1)
NCDENR GIS Topo Map Viewer: Address Locator (1998 aerial) (Reference 2)
Memorandum dated May 16, 2005 with Email Attachment (Reference 3)
Letter dated August 11, 1990 (Reference 4)
Letter dated August 27, 1991 (Reference 5)
Excerpts from UST Soil Cleanup Report (Reference 6)
Letter dated April 6, 2001 from UST (NFA letter) (Reference 7)



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,

for *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

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

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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