**Correspondence between the US Army and DTSC**

Department of Toxic Substances Control

***Matthew Rodriquez***
Secretary for
Environmental Protection

Deborah O. Raphael, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

***Edmund G. Brown Jr.***
Governor

October XX, 2011

Ms. Laura Caballero
BRAC Environmental Coordinator
Headquarters, 63rd Regional Support Command
United States Army
230 R.T. Jones Road
Mountain View, California 94043

FINDING OF SUITABILITY TO TRANSFER AND ENVIRONMENTAL CONDITION OF PROPERTY, DESIDERIO HALL US ARMY RESERVE CENTER, 655 WESTMINSTER DRIVE, PASADENA, CALIFORNIA

Dear Ms. Caballero:

The California Department of Toxic Substances Control (DTSC) has reviewed the document entitled "**Finding of Suitability to Transfer, Desiderio Hall, United States Army Reserve Center (CA038), 655 Westminster Drive, Pasadena, California 91105**" dated October 2011 (FOST), and the referenced **"Environmental Condition of Property"**, dated April 2007 (ECOP), for the same property. In addition to these documents, DTSC reviewed the 2007 Phase I Environmental Site Assessment (Phase I) prepared for the City of Pasadena. DTSC has the following specific comments regarding the FOST and ECOP:

1. The FOST and ECOP provide sufficient detail and site history of the Desiderio Hall portion or southern portion of the property but lacks detail on the history or use of the northern portion of the property. The ECOP simply refers to the lack of information on the northern portion.

2. The ECOP refers to a suspected UST on the northern portion of the property and indicates knowledge of but no presentation of geophysical survey of portions of the northern portion in the area of the suspected UST. The ECOP states that the geophysical survey report recommended follow-up investigation of anomalies. No follow-up is discussed. Figure 2 of the ECOP indicates a possible location of

the UST and inferred location of the geophysical survey. The Phase I reported demolition of a gas station, grease rack, and closure-in-place of USTs in 1978 with building numbers that don't match the 1950 building numbers. Later the Phase I provides Pasadena Fire Department oversight of the removal of three tanks with no detected contamination in 1998. The Phase I included an SI Report (2000) for the closure of the Site 03 Grease Rack which included three soil borings in the northern area. Soil vapor samples showed no detected contaminants.

3. Only limited history of the northern portion of the site appeared to have been attempted in the ECOP. A web search identified a high likelihood that the northern portion of the site is part of the former Pasadena Area Support Center, or Pasadena Army Support Center Formerly Used Defense Site. In part, this was a support center for the Los Angeles Nike Missile Battery. The Sanborn Map of 1950 shows the site consists of several warehouses, cold storage, an incinerator, and a building identified as the "Ordinance Maintenance Shop". Presumably the word "Ordinance" was misspelled and was intended to state "Ordnance". This northern portion of the facility appears separate from the Desiderio Hall area and the aerial photos show activity coinciding with the active Nike Program from 1950 to about 1965. Buildings show up in the 1949 aerial photo, are occupied in the 1956 and 1965 aerial photos and are deserted with possible removal of buildings in the 1976 aerial photo. Although searches for the Pasadena Army Support Center identify 125 S. Grand Avenue as the address, discussion in each describes the Nike portion of the Support Center as behind and down the hill from the current Federal Building.

DTSC's concerns for these activities include the following:

4. Incinerator –

    a. The 1950 Sanborn Map shows an incinerator adjacent to former Building T205. It is unclear if the ECOP reference to a UST refers to this circle. Circles are used to indicate both tanks and stacks. Since this circle-rectangle combination is labeled "INCIN'R", DTSC concludes it is an incinerator.

    b. Incinerators generate a significant quantity of heavy metals contaminated ash. In DTSC's experience, facilities with incinerators have ash disposal issues. At Parks Reserve Forces Training Area, Dublin, the US Army has

proposed a removal remedy for 6000 cubic yards of soil contaminated with lead and dioxins from incinerator ash at the Building 109 Incinerator. The maximum lead concentration in soil is 10,000 mg/kg. At Beale Air Force Base, ash from the incinerator was disposed of in the adjacent landfill. Lead was identified at 2800 mg/kg in an ash layer of a landfill cell.

c. Heavy Metals and Dioxin contamination is possible in the area around the former incinerator. The aerial photo of 1956 shows the area to the west of the incinerator was earthen with trees. The area is currently paved.

5. Ordnance Maintenance Shop – The 1950 Sanborn Map lists an "Ordinance Maintenance Shop" as Building T-225. Ordnance maintenance usually involves solvent use, collection, and disposal. No information is provided concerning the ordnance maintenance activities nor has any investigation been conducted to evaluate if releases have occurred. The Phase I prepared for the City of Pasadena included the Grease Rack investigation report. The nearest soil vapor sampling location appears to have occurred south of the Colorado Street Bridge as part of the investigation of the former OMS Grease Rack, Site 03. Soil vapor analysis in this boring was non-detect for VOCs.

6. Storage Building – The building identified as the Storage Building show up on the 1970 Sanborn Map as an Auto Repair Shop. No information or investigation of this facility or potential releases is provided, however the Phase I shows that a soil boring (SB11) was installed as part of the OMS Grease Rack investigation near the Storage Building. No contaminants were detected soil vapor.

7. No Sanborn Maps were provided for the period between 1950 and 1970, the period of greatest activity in the northern portion. The 1956 and 1965 Aerial Photos show a different building layout than that shown on the two Sanborn Maps and show significant activity on the northern portion. Additionally, the Building numbers referenced in the 2007 Phase I for the Gas Station and Grease Rack removal did not coincide with building numbers on the 1950 Sanborn map. This indicates that this area saw multiple land uses between 1950 and 1970.

8. DTSC was been involved in the environmental investigation of the Grease Rack on the southern portion of the property containing Desiderio Hall and the Organizational Maintenance Shop. DTSC provided a No Further Action approval for the Grease Rack area.

9. A 1998 investigation of the washrack and associated oil water separator by Woodward Clyde showed no soil contamination.

Conclusion and Recommendation – DTSC concludes, based on available data, the northern portion of the property operated as part of the Pasadena Army Support Center which included support for the Los Angeles Nike Missile Battery. Historical activities on the northern portion of the property included at least four potential release locations which were not addressed in the ECOP or FOST. Based on a review of the Sanborn Maps and Phase I, DTSC identified the Incinerator (North of Building T-205), the Ordnance Maintenance Shop (Building T-225), the Storage Building (Former Auto Repair Shop), and Former Gas Station/Grease rack removed with USTs closed-in-place in 1978, with tanks removed in 1998, as potential release areas which should be discussed in this report.

- Incinerator (near former Building T-205): Possible source of metals contamination in soil if ash was disposed of on-site. Due to the date of the
- Ordnance Maintenance Shop(Former Building T-225): Possible source of solvent contamination from ordnance maintenance activities. The 2007 SI soil investigation provided no indication of significant soil vapor contamination within the study area. No soil samples or results have been presented for the northern area.
- Storage Building (Former Auto Repair Shop): Possible source of fuels, oils, and solvent contamination. The 2007 SI soil investigation included a soil boring and soil vapor samples collected near the southwest portion of this site. No contaminants were detected.
- Former Gas Station/Grease Rack: The Phase I report provided evidence of removal of the facility in 1978 and removal of the USTs in 1998. Soil samples did not have detected contaminants.

Historical records of the “Pasadena Area Support Center” could have been researched for possible uses of the northern portion of the property. Both the Phase I prepared for the City of Pasadena and the Environmental Condition of Property conclude that no releases have occurred on the northern portion of the property. With the exception of potential metals contamination, DTSC concurs the potential release locations have been evaluated and no releases of hazardous substances have been identified.

Activities in the southern portion of the property, the area containing Desiderio Hall and the OMS Building have been adequately investigated and no releases of hazardous substances were identified at levels which pose a threat to human health. DTSC concurs with the ECP Category 1 determination and the finding of suitability for transfer for the southern half of the property.

Thank you for your consideration in this matter. Please feel free to direct any questions or comments you may have to my attention. I can be reached at (916) 255-6442 or by email at cridenou@dtsc.ca.gov.

Sincerely,

Charles Ridenour
Branch Chief
Cleanup Program - Sacramento Office

cc: Ms. Laura Dahl
Senior Planner
Community Planning Section
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175 N Garfield Ave.
Pasadena, CA 91101

**DEPARTMENT OF THE ARMY**
**HEADQUARTERS, 63D REGIONAL SUPPORT COMMAND**
**P.O. Box 63**
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**REPLY TO ATTENTION OF:**

Environmental Office

12 December 2011

Mr. Charles Ridenour
Department of Toxics Substance Control, Cleanup Program
Branch Chief
8800 Cal Center Drive
Sacramento, California 95826-3200

Re: Finding of Suitability to Transfer and Environmental Condition of Property, Desiderio Hall U.S. Army Reserve Center, 655 Westminster Drive, Pasadena, California 91105

Dear Mr. Ridenour:

This letter is in response to your letter dated October 24, 2011, of your review of the documents entitled ***Finding of Suitability to Transfer, Desiderio Hall, United States Army Reserve Center (CA038), 655 Westminster Drive, Pasadena, California 91105*** dated October 2011 (FOST), and the referenced ***Environmental Condition of Property***, dated April 2007 (ECP, referred to as "ECOP" by DTSC), for the same property. We are responding to Department of Toxic Substances Control (DTSC) comments regarding the FOST and ECOP (DTSC comments are indented, and 63d RSC responses are not indented):

1. The FOST and ECOP provide sufficient detail and site history of the Desiderio Hall portion or southern portion of the property but lacks detail on the history or use of the northern portion of the property. The ECOP simply refers to the lack of information on the northern portion.

We conducted additional research for information regarding the history and use of the northern portion of the Desiderio Hall U.S. Army Reserve (USAR) Center. There are gaps in the available information for this portion of the property, especially specific details on types and use of support buildings. We have, however, determined certain timeline information. In 1943, the War Department acquired the Vista del Arroyo Hotel and Bungalows complex, converting its use to a hospital and offices for the U.S. Army. This included what is now the Desiderio USAR Center . Originally known as the Pasadena Area Station Hospital, it was later renamed McCormack General Hospital. In 1949, the hospital was deactivated. In 1951, the hospital was converted to use as the Pasadena Area Support Center and was the Headquarters (HQ) for the 12$^{th}$ Artillery Group and later, from 1954 to 1963, was also the HQ battalion for the 1$^{st}$ Battalion of the 56$^{th}$ Air Defense Artillery. In 1956, on the southern portion of the Desiderio USAR Center property, the USAR facilities were constructed. The northern portion of the USAR Center property and the old Pasadena Support Center were transferred to the General Services Administration from 1964 to 1973 and used for various federal offices. During this time it is surmised from the 1970 Sanborn map that many of the support buildings that supported the hospital and the Pasadena Support Center were demolished, as they were removed from the

maps. In the mid-1970's, the USAR acquired the northern portion of the Desiderio USAR Center lot. This area was paved at the time and was repaved when acquired.

2. The ECOP refers to a suspected UST on the northern portion of the property and indicates knowledge of but no presentation of geophysical survey of portions of the northern portion in the area of the suspected UST. The ECOP states that the geophysical survey report recommended follow-up investigation of anomalies. No follow-up is discussed. Figure 2 of the ECOP indicates a possible location of the UST and inferred location of the geophysical survey. The Phase I reported demolition of a gas station, grease rack, and closure-in-place of USTs in 1978 with building numbers that don't match the 1950 building numbers. Later the Phase I provides Pasadena Fire Department oversight of the removal of three tanks with no detected contamination in 1998. The Phase I included an SI Report (2000) for the closure of the Site 03 Grease Rack which included three soil borings in the northern area. Soil vapor samples showed no detected contaminants.

As noted in the Phase I report completed by the City of Pasadena, the Pasadena Fire Department conducted oversight for the removal of all three USTs and noted there was no indication of contamination during the removal in 1989. The report indicates that no further action is required. A discussion about these actions will be added to the ECOP.

3. Only limited history of the northern portion of the site appeared to have been attempted in the ECOP. A web search identified a high likelihood that the northern portion of the site is part of the former Pasadena Area Support Center, or Pasadena Army Support Center Formerly Used Defense Site. In part, this was a support center for the Los Angeles Nike Missile Battery. The Sanborn Map of 1950 shows the site consists of several warehouses, cold storage, an incinerator, and a building identified as the "Ordinance Maintenance Shop". Presumably the word "Ordinance" was misspelled and was intended to state "Ordnance". This northern portion of the facility appears separate from the Desiderio Hall area and the aerial photos show activity coinciding with the active Nike Program from 1950 to about 1965. Buildings show up in the 1949 aerial photo, are occupied in the 1956 and 1965 aerial photos and are deserted with possible removal of buildings in the 1976 aerial photo. Although searches for the Pasadena Army Support Center identify 125 S. Grand Avenue as the address, discussion in each describes the Nike portion of the Support Center as behind and down the hill from the current Federal Building.Only limited history of the northern portion of the site appeared to have been attempted in the ECOP. A web search identified a high likelihood that the northern portion of the site is part of the former Pasadena Area Support Center, or Pasadena Army Support Center Formerly Used Defense Site. In part, this was a support center for the Los Angeles Nike Missile Battery.

We have determined that there were buildings on the northern portion of the Desiderio USAR Center that could have been support structures to the Pasadena Area Support Center, as well as its previous use as the McCormack General Hospital. The McCormack Hospital and the Pasadena Area Support Center had main administrative offices/hospital located at 125 South Grand Avenue. The support structures/buildings were located below on what is now the Desiderio USAR Center at 655 Westminster Drive. This main building on 125 South Grand Avenue initially supported the McCormack Hospital from 1943 to 1949, then from 1950 to 1954 supported the HQ for the 12$^{th}$ Artillery Group. Later, from 1954 to 1963, it was the HQ for the 1$^{st}$ Battalion of the 56$^{th}$ Air Defense Artillery, supporting the Nike Missile Program as part of the Pasadena Area Support Center. The buildings located on the Desiderio USAR Center property were support buildings to support first the Hospital and later the administrative HQ elements of the Nike Missile Program. These structures included cold storage, unheated storage, and vehicle

maintenance shops. Research via archivists and museum directors from the Fort MacArthur Museum, the Pasadena History Museum, and the California State Military Museum assisted in identifying these structures, which would most likely occur at these types of facilities, but unfortunately they have not been able to provide any additional information about these support buildings and their functions. A discussion about these buildings will be added to the ECP.

4. Incinerator –

    a. The 1950 Sanborn Map shows an incinerator adjacent to former Building T205. It is unclear if the ECOP reference to a UST refers to this circle. Circles are used to indicate both tanks and stacks. Since this circle-rectangle combination is labeled "INCIN'R", DTSC concludes it is an incinerator.

We researched Sanborn map symbols and are providing as an enclosure the Sanborn map symbols and abbreviations. There is no indication that INCIN'R means incinerator within the abbreviations or map symbols, but white circles can mean iron chimneys, vertical pipes, stand pipes, or underground storage tanks (UST). Although one could speculate, it is difficult to conclude with certainty whether this is or is not a symbol for an incinerator. Steve Nelson, director of the Fort MacArthur Nike Missile Museum, confirmed that this would more likely have been a structure used by the hospital and not the Nike Missile program. This is further supported by the document *Historical Overview of the Nike Missile System*, by Environmental Science and Engineering, Inc., December 1984 (enclosed), which has detailed maps of Nike batteries and command and control centers that can be found on Pages D1-D4 [last pages] and Figures 4-2 and 4-3. There are no indications of any incinerators on these maps. We communicated with Ryan from Environmental Data Resources Inc. (EDR) and learned that no additional Sanborn maps exist for the periods of 1943-1950 and 1951-1970 during which time the Army Hospital operated, to determine if this incinerator was in use to support Hospital operations. We surmise that this is most likely the case as they were not used in the Nike missile program, based on the above information. In addition, it should be noted that backyard incinerators were an acceptable practice at homes and businesses in the Los Angeles basin until the late 1950's. In an article, *The Southland's War on Smog: Fifty Years of Progress Toward Clean Air,* (enclosed) historical information is presented, starting in 1943, that smog was a problem for the Los Angeles basin. In August of 1945, the *Pasadena Star-News* published a series of articles by county Health Officer Dr. H.O. Swartout, who asserted that smog, in fact, came from many sources including locomotives, diesel trucks, burning rubbish in backyard incinerators and city dumps, and the combustion of scrap lumber in sawmills. This activity was banned in the Los Angeles basin, which indicates that there was a possibility of widespread burning near the Desiderio USAR Center. With this in mind, soil samples collected at the Desiderio USAR Center could have potentially yielded elevated levels of heavy metals and dioxins attributed to this widespread activity throughout the Los Angeles basin. In addition, with the amount of the environmental sampling and investigations in the region, a release offsite would have been discovered long ago in surface water in the adjacent arroyo as water traverses through the watershed.

In the March 2001, a CDM Federal Site Investigation Report recorded several soil samples were collected in the northern portion of the Desiderio USAR Center. Specifically, a subsurface soil sample SB-9 was collected approximately 275 feet from the possible incinerator and was analyzed for CAM 17 metals. The sample result indicated that it did not exceed residential

Preliminary Remediation Goals (PRGs), with the exception of arsenic, which was determined to be at background levels. The low levels found for all the metals sampled are a good indication that dioxins are not present either. Finally, the geophysical survey reported in the ECP did not show any subsurface anomalies in the areas surveyed. Had ash from an incinerator, or other debris, been buried on site, the material would have shown up strikingly on the survey as the difference in densities between native soils and buried materials or objects. While the survey apparently did not cover the bulk of the site, it appears that enough of the site was surveyed to suggest that likely areas of potential burial can be ruled out. With this in mind, and because a good portion of the site was surveyed, one can conclude that it is not likely that there is buried material present. The ECP states that the 1950 Sanborn show the area that might be the incinerator as a potential underground storage tank, which is where the GPR survey was conducted, with no anomaly reported in the area of building T-205. Had ash been buried at the site, it would logically have been near the point of generation. The symbol near the characters "INCIN'R" is the same symbol used for an underground storage tank. Thus supporting the argument there is no indication that ash piles or USTs are present at the site.

b. Incinerators generate a significant quantity of heavy metals contaminated ash. In DTSC's experience, facilities with incinerators have ash disposal issues. At Parks Reserve Forces Training Area, Dublin, the US Army has proposed a removal remedy for 6000 cubic yards of soil contaminated with lead and dioxins from incinerator ash at the Building 109 Incinerator. The maximum lead concentration in soil is 10,000 mg/kg. At Beale Air Force Base, ash from the incinerator was disposed of in the adjacent landfill. Lead was identified at 2800 mg/kg in an ash layer of a landfill cell.

These examples show activities that have occurred on federal military installations of vast size and acreage (approximately 5,000-7,000 acres), Desiderio US Army Reserve Center is approximately 5 acres. Installations of this size have the space to generate ash piles, but it is highly unlikely ash piles would have been generated at this small location. According to the Sanborn maps and the aerial maps, suitable locations did not exist as this material would have had to have been placed in close proximity to non-military housing, dressing rooms, swimming pools, warehouses, and office areas. Also, as discussed above, soil sampling conducted within proximity to the possible incinerator during the site investigation did not indicate heavy metal contamination, and subsequently did not require further confirmation sampling to determine that contamination was caused from incinerator activity. Additoinally, the geophysical survey reported in the ECP did not show any subsurface anomalies in the areas surveyed. Had ash from an incinerator, or other debris, been buried on site, the material would have shown up strikingly, on the survey as the difference in densities between native soils and buried materials or objects. While the survey apparently did not cover the bulk of the site, it appears that enough of the site was surveyed to suggest that likely areas of potential burial can be ruled out. The ECP states that the 1950 Sanborn showed the area that might be the incinerator as a potential underground storage tank, which is where the GPR survey was conducted, with no anomaly reported in the area of building T-205. The symbol near the characters "INCIN'R" is the same symbol used for an underground storage tank. Thus, again, supporting the argument there is no indication that ash piles or USTs are present at the site.

c. Heavy Metals and Dioxin contamination is possible in the area around the former incinerator. The aerial photo of 1956 shows the area to the west of the incinerator was earthen with trees. The area is currently paved.

Please see above response in regards to the possibility of heavy metals and dioxin contamination. Soil sampling conducted within proximity to the possible incinerator during the site investigation does not indicate heavy metal contamination, and subsequently does not support the need for further sampling to confirm that contamination was caused from potential incinerator activity.

5. Ordnance Maintenance Shop – The 1950 Sanborn Map lists an "Ordinance Maintenance Shop" as Building T-225. Ordnance maintenance usually involves solvent use, collection, and disposal. No information is provided concerning the ordnance maintenance activities nor has any investigation been conducted to evaluate if releases have occurred. The Phase I prepared for the City of Pasadena included the Grease Rack investigation report. The nearest soil vapor sampling location appears to have occurred south of the Colorado Street Bridge as part of the investigation of the former OMS Grease Rack, Site 03. Soil vapor analysis in this boring was non-detect for VOCs.

The March 2001 CDM Federal Site Investigation Report states several soil vapor samples (SB-8, SB-9, SB-10, and SB-11) were collected south of the Colorado Street Bridge in the northern portion of the Desiderio USAR Center. SB-8 was collected within 175 feet of the shop and SB-10 was collected within 150 feet of the shop. SB-9 was collected 250 feet from the shop and SB-11 is 256 feet from the shop. The results of all samples collected were non-detect (ND) for volitile organic compounds (VOCs). We determined that based on the sandy alluvial soil type in this area, VOCs would have been present even at low levels from any solvent use in the shop. Thus based on this information, further sampling in closer proximity to the ordinance maintenance shop will not yield any further confirmation of the presence of VOCs. A discussion regarding the above will be added to the ECP.

6. Storage Building – The building identified as the Storage Building shows up on the 1970 Sanborn Map as an Auto Repair Shop. No information or investigation of this facility or potential releases is provided, however the Phase I shows that a soil boring (SB11) was installed as part of the OMS Grease Rack investigation near the Storage Building. No contaminants were detected soil vapor.

We concur that the storage building at Desiderio USAR Center was previously identified as an auto repair shop on the 1970 Sanborn map. Investigation of the grease rack under the March 2001 CDM Federal Site Investigation Report states the SB-11 VOC sample point was located about 30 feet from the storage building; SB-9 and SB-10 are located about 80 feet from the building; and SB-8 is located about 100 feet from the building. Each of these samples were ND for VOCs; additionally, SB-9 was ND TEPH-diesel and TEPH-oil and had all metals samples below PRGs, except arsenic. Arsenic was determined to be background levels. Based on this information and other information presented above, this area is not an area of concern. A discussion regarding this area will be added to the ECP.

7. No Sanborn Maps were provided for the period between 1950 and 1970, the period of greatest activity in the northern portion. The 1956 and 1965 Aerial Photos show a different building layout than that shown on the two Sanborn Maps and show significant activity on the northern portion. Additionally, the Building numbers referenced in the 2007 Phase I for the Gas Station and Grease Rack removal did not coincide with building numbers on the 1950 Sanborn map. This indicates that this area saw multiple land uses between 1950 and 1970.

We acknowledge the wide variation in the historical use of the property and the distinct gap in Sanborn Map coverage for the specified period. We contacted EDR, which purchased the Sanborn Map collection in its entirety (Sanborn Library) and maintains the digitized map collection, to inquire whether additional maps are available. The four Sanborn Maps included in the 2007 ECP Report (1910, 1931, 1950, and 1970) are the only maps available for the subject property.

8. DTSC was involved in the environmental investigation of the Grease Rack on the southern portion of the property containing Desiderio Hall and the Organizational Maintenance Shop. DTSC provided a No Further Action approval for the Grease Rack area.

We agree that DTSC was involved in the environmental investigation on the closure, and DTSC provided a No Further Action approval for the Grease Rack at Desiderio USAR Center.

9. A 1998 investigation of the washrack and associated oil water separator by Woodward Clyde showed no soil contamination.

We confirmed previous involvement with DTSC on the closure and No Further Action approval for the washrack and oil water separator at Desiderio USAR Center.

Conclusion and Recommendation – DTSC concludes, based on available data, the northern portion of the property operated as part of the Pasadena Army Support Center which included support for the Los Angeles Nike Missile Battery. Historical activities on the northern portion of the property included at least four potential release locations which were not addressed in the ECOP or FOST. Based on a review of the Sanborn Maps and Phase I, DTSC identified the Incinerator (North of Building T-205), the Ordnance Maintenance Shop (Building T-225), the Storage Building (Former Auto Repair Shop), and Former Gas Station/Grease rack removed with USTs closed-in-place in 1978, with tanks removed in 1998, as potential release areas which should be discussed in this report.

- Incinerator (near former Building T-205): Possible source of metals contamination in soil if ash was disposed of on-site. Due to the date of the…
- Ordnance Maintenance Shop (Former Building T-225): Possible source of solvent contamination from ordnance maintenance activities. The 2007 SI soil investigation provided no indication of significant soil vapor contamination within the study area. No soil samples or results have been presented for the northern area.
- Storage Building (Former Auto Repair Shop): Possible source of fuels, oils, and solvent contamination. The 2007 SI soil investigation included a soil boring and soil vapor samples collected near the southwest portion of this site. No contaminants were detected.
- Former Gas Station/Grease Rack: The Phase I report provided evidence of removal of the facility in 1978 and removal of the USTs in 1998. Soil samples did not have detected contaminants.

Historical records of the “Pasadena Area Support Center” could have been researched for possible uses of the northern portion of the property. Both the Phase I prepared for the City of Pasadena and the Environmental Condition of Property conclude that no releases have occurred on the northern portion of the property. With the exception of potential metals contamination, DTSC concurs that the potential release locations have been evaluated and no releases of hazardous substances have been identified.

> Activities in the southern portion of the property, the area containing Desiderio Hall and the OMS Building have been adequately investigated and no releases of hazardous substances were identified at levels which pose a threat to human health. DTSC concurs with the ECOP Category 1 determination and the finding of suitability for transfer for the southern half of the property.

We conducted research through the Fort MacArthur Nike Missile Museum, Pasadena History Museum, the California State Military Museum and web research for additional information on the historical use of the northern portion of the Desiderio USAR Center by the McCormack Army Hospital and the Pasadena Area Support Center for the Nike Missile Program. All information that has been obtained on the history of this area is included as an enclosure to this letter and will be incorporated as reference in the ECP update. DTSC has recommended that additional samples be collected to ensure no heavy metals contamination has resulted from possible incinerator use on the property. From the research, we cannot conclude that the symbols on the Sanborn map are indications of an incinerator. Included Sanborn map abbreviations and legends do not indicate incinerators. Circles on Sanborn maps can indicate iron chimneys, vertical pipes or stand pipes and gasoline tanks and the abbreviation INCIN'R is not included in the list of Sanborn Map Abbreviations. So, if this symbol indicates an incinerator caused heavy metal contamination, then heavy metals would have been detected in the sampling from the grease rack. The geophysical survey reported in the ECP further confirms the lack of subsurface anomolies in the areas surveyed. The bulk of the site was surveyed and suggests that the likelyhood of burial ash from an incinerator, or other debris, is unlikely to be present as it would have been identified from the differing soil densities found on-site. Based on the geophysical survey and because prior samples indicate all levels are well below PRG levels, we conclude that no additional sampling is necessary.

The 63d RSC concurs with and appreciates DTSC's conclusion that no further sampling is necessary on the ordinance maintenance building (T-225), storage building, and the former gas station/grease rack with USTs.

We look forward to your response. If you have questions or concerns about this project, please contact Ms. Laura M. Caballero, Environmental Chief, 63d RSC at (650) 279-9112.

Sincerely,

Robert D. Johnson
Colonel, US Army Reserve
Director, Department of Public Works

Enclosures

Department of Toxic Substances Control

Deborah O. Raphael, Director
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*Matthew Rodriquez*
Secretary for
Environmental Protection

*Edmund G. Brown Jr.*
Governor

January 9, 2012

Colonel Robert D. Johnson, U.S. Army Reserve
Regional Engineer
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230 R.T. Jones Road
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FINDING OF SUITABILITY TO TRANSFER AND ENVIRONMENTAL CONDITION OF PROPERTY, DESIDERIO HALL U.S. ARMY RESERVE CENTER, 655 WESTMINSTER DRIVE, PASADENA, CALIFORNIA

Dear Colonel Johnson:

The California Department of Toxic Substances Control (DTSC) has reviewed the document entitled "**Finding of Suitability to Transfer, Desiderio Hall, United States Army Reserve Center (CA038), 655 Westminster Drive, Pasadena, California 91105**" (FOST) dated October 2011, and response to comments dated 19 December 2011, and we concur with the responses and with the Suitability to Transfer the Desiderio Hall property.

Please provide the updated Environmental Condition of Property (ECP) for our files. At that time we will designate the Desiderio Hall Project as No Further Action. Thank you for responding completely to our comments. This finding is based on information provided to date and does not preclude DTSC from taking action pursuant to the Health and Safety Code should additional information become available.

Please feel free to direct any questions or comments you may have to my attention. I can be reached at (916) 255-6442 or by email at cridenou@dtsc.ca.gov.

Sincerely,

Charles Ridenour
Branch Chief
Cleanup Program - Sacramento Office

cc: See next page.

cc: Ms. Laura Caballero
BRAC Environmental Coordinator
Headquarters, 63rd Regional Support Command
United States Army
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Ms. Laura Dahl
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