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1.0 EXECUTIVE SUMMARY

BlueRidge Environmental, Inc. (BlueRidge), has completed a Phase I Environmental Site Assessment (ESA) of the property known as the Fort Stanton Property located on the south side of Good Hope Road, S.E., Washington, D.C. (the site). The ESA was performed in accordance with a proposal submitted to KSI Services, Inc., dated December 6, 1998. The site inspection was performed by Kent Campbell of BlueRidge on December 7, 1998. Mr. Campbell was not accompanied by any other persons during the site inspection.

The site consists of a rectangular-shaped, 8.5-acre parcel of land located in a residential area of southeast Washington, D.C. The property is located south of Good Hope Road near the intersection with 24th Street. The site is undeveloped, unimproved, and covered with grasses and small trees.

Based on the findings of this ESA, no on-site environmental concerns were identified. However, the following off-site environmental concern was identified: a leaking registered underground storage tank (LRST) was reported to be located at the Skyland apartments, Area #1, located approximately 0.15 miles southeast and upgradient of the site. This LRST case has been closed by the District of Columbia, and no further action has been required. Based on these facts, BlueRidge does not believe that this LRST site poses a risk to the subject property.

It should be noted that the site has been covered with a large quantity of construction-related fill materials emplaced by the Washington Metropolitan Area Transit Authority (WMATA), reportedly in the early to mid 1990s. Observations made during the site inspection and reported in previous studies do not indicate that these fill materials present an environmental concern. However, any suspect materials or containers that may be exposed as a result of development of the site should be assessed by an environmental professional to determine the extent of possible environmental impact and proper disposal procedures for the material. Information on the specific source and composition of the fill materials has been requested from WMATA and will be forwarded to KSI Services, Inc., upon receipt by BlueRidge.

2.0 OBJECTIVES AND LIMITATIONS

The purpose of the Phase I ESA is to identify evidence of oil or hazardous materials that are, have been, or potentially could be released onto the site or in the vicinity of the site. The scope of the ESA may include some or all of the following: a site and site vicinity inspection; interviews with site personnel; interviews with state and local officials; and a review of federal, state and local records. The work was performed in accordance with generally accepted environmental consulting practices and the ASTM Minimum Standards for the Performance of Phase I ESAs and is subject to the following limitations.

- The opinions rendered herein are based on professional expertise and experience. No other warranty, either expressed or implied, is made.

BZA
Case No. 16457
Exhibit No. 124

Board of Zoning Adjustment
District of Columbia
CASE NO.16457
EXHIBIT NO.124

- The findings set forth in this report are strictly limited to the date of the evaluation. The conclusions presented in the report are based solely on the services described herein and not on scientific tasks or procedures beyond the scope of agreed upon services.

- The purpose of this report was to assess the physical characteristics of the subject site with respect to the presence in the environment of oil or hazardous material. No specific recommendation was made to check on the compliance of present or past owners or operators of the site with federal, state, or local laws and regulations, environmental or otherwise.

- Partial findings of this investigation are based on data provided by others. No warranty is expressed or implied with the usage of such data. A portion of the information provided in this report is based upon personal interviews and research of all available documents, records, and maps held by the appropriate government and private agencies. These items are subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollection of those persons contacted by BlueRidge.

- The initial site investigation took into account the natural and man-made features of the site, including any unusual or suspect phenomenon. These factors, along with the site's geology, hydrology, topography, and past and present land uses, served as a combined basis for determining areas of environmental concern. The presence of asbestos-containing materials, lead-based paint, radioactive materials, and biological hazards was not investigated.

3.0 SITE OVERVIEW

The site, known as the Fort Stanton Property, is located on the south side of Good Hope Road in southeast Washington, D.C. The subject property, zoned R5-A, "Residential-Apartments," exists within a mostly residential area of southeast Washington, D.C. The general vicinity of the site is shown on Figure 1.

The site consists of 8.5 acres of undeveloped land identified as Tax Map Parcel 219, Lot 96 and Parcel 220, Lot 31. The site is currently undeveloped and is covered with grasses and small trees. The site is bounded to the north by Good Hope Road, across which apartment buildings are located. The site is bounded to the east by the Skyland Apartments. The site is bounded to the south by a townhouse development where both existing and partially-constructed homes are located. The site is bounded to the west by Fort Stanton Park, which is owned by the National Park Service. A general site plan is provided as Figure 2.

4.0 SITE BACKGROUND/OPERATING HISTORY

This section provides the general history of the site including previous owners, past usage, and details of previous investigations conducted at the site.

4.1 Property Ownership

The current owner of the subject property is Kass Realty Company, Inc. According to a chain-of-title document prepared by Merit Title Company, dated November 30, 1998, the site has been previously owned by individuals or realty and building corporations. No past ownership of the property indicated the potential for environmental concerns at the site such as industrial, manufacturing, or retail gasoline sales use.

4.2 Historical Property Usage

The history of the site was reconstructed based on the physical inspection, previous reports, and a review of a Sanborn Fire Insurance Map and an aerial photograph for the year 1960. In the 1960 aerial photograph, the site exists as an undeveloped, partially wooded lot. The surrounding areas to the north and east are developed with multi-family residences. The areas to the west and south of the subject property are undeveloped.

BlueRidge reviewed a Sanborn Fire Insurance map for 1960. This map indicated that the site was barren of any structures, notations of storage tanks, or use of environmental concern.

4.3 Environmental Background

No current site activities require environmental permitting. In addition, based on the historical review, no past site activities required environmental permits.

The site is currently undeveloped and research into the past use of the site indicates that it has been vacant since at least 1960. Reports prepared by others indicate that WMATA used the site for the placement of fill materials, reportedly in the early to mid 1990s. The fill was placed across the entirety of the site and ranged from 4 to 40 feet in thickness. This fill was reported to be construction debris consisting of predominantly asphalt and concrete. During the site inspection, BlueRidge observed concrete, asphalt, gravel, dimensioned stone, dimensioned lumber, cast iron pipes, and reinforced concrete pipes in the fill materials. These materials were observed at the surface in areas where a test pit investigation had been conducted by others and in gullies that occur along the western and southern sides of the site. BlueRidge has submitted a request to Mr. John Magarelli, Engineer for WMATA, to obtain any information available on the exact date of placement and origin of the fill materials.

A *Geotechnical Feasibility Investigation* performed by Whitlock, Dalrymple, Poston & Associates (WDP) in November 1998 included the completion of 13 test pits along the upper areas of the fill materials. These test pits yielded large quantities of general construction

debris including asphalt, concrete, bricks, and steel. During completion of the test pits, refusal was encountered due to large pieces of concrete or asphalt. Based on the information obtained to date, and the lack of any visual evidence of environmental hazards at the site, the fill material does not appear to be of environmental concern.

5.0 ENVIRONMENTAL SETTING

This section of the report describes the surface water, subsurface geology, and groundwater characteristics of the site based on the physical inspection and published sources.

5.1 Surface Water Characteristics

The site is situated on gently to steeply sloping terrain that grades down to the south and west. The elevation of the site has been altered by the placement of the fill materials by WMATA. Prior to the placement of these materials, the site elevation ranged from 150 feet above mean sea level (MSL) along the western boundary to 200 feet MSL along the eastern boundary of the site. The fill materials have changed the topography of the site so that the elevation of the site now ranges from 150 to 210 feet above MSL. However, whereas the topography had previously been typified by a gentle 50-foot grade from east to west across the site, current topography is generally level across the majority of the site with steep slopes, approximately 40-feet high, along the western and southern property boundaries. The bottom of these steep slopes are at the elevations existing prior to placement of the fill materials.

No surface water bodies are located on the site. The nearest surface body of water is an intermittent stream located near the southwestern corner of the site. This intermittent water body appears to emanate from an off-site 24-inch diameter reinforced concrete pipe storm sewer. This intermittent stream then flows to the west-northwest following the regional topography towards the Anacostia River.

Surface water runoff from the site flows uncontrolled as sheet flow to the west and south following topography. Several gullies and smaller rivulets were noted along the edges of the fill materials during the site inspection. No areas of standing or running water were observed on the site during the inspection. No stressed vegetation or other unusual conditions associated with the drainage were noted.

Based on information obtained from the National Wetland Inventory Map for the area, no identified wetland areas are present on or adjacent to the site.

5.2 Subsurface Geology

The site is located within the Atlantic Coastal Plain Physiographic Province of Washington, D.C. The geology of the site is typified by fluvial sediments comprised of silty gravels deposited by the Potomac River. This in-situ geologic material has been covered by 4 to 40 feet of construction fill materials placed over the site by WMATA.

5.3 Groundwater Characteristics

No site specific groundwater data was available for review. In general, groundwater is expected to occur within the pore spaces of the sedimentary units that underlie the fill materials. In addition, it is possible that some perched water conditions will occur within the fill materials themselves during times of moderate to heavy precipitation. Groundwater flow in the area is anticipated to follow the local topography and flow to the west-northwest towards the Anacostia River.

No drinking water wells are located on the subject property. The site is not serviced by municipal water. Drinking water for residents in the area is provided by the District of Columbia Department of Public Works. This water is obtained from intakes along the Potomac River and from the Decarlia and Georgetown Reservoirs located in the northwestern portion of Washington, D.C.

6.0 SITE INSPECTION

BlueRidge inspected the site on December 7, 1998. BlueRidge was not accompanied on the site inspection by a representative of the property. During the site visit, the inspector walked all areas of the site and accessible areas of abutting properties. This section describes the condition of the site at the time of the inspection. Photographs taken during the site inspection are attached as Appendix A.

6.1 Site Observations and Inquiries

The site is currently undeveloped and has no improvements. The site is relatively flat along the central and eastern portions of the site while steep slopes predominate along the western and southern portions of the site. These steep slopes were created by the placement of the fill materials. The entire site is covered with grasses and there is a small area on the east-southeastern portion of the site where immature trees have begun to proliferate. BlueRidge observed that the surface of the site is covered with a thin veneer of soil which has, in places, been eroded. In areas where erosion has occurred, BlueRidge observed concrete, asphalt, gravel, dimensioned stone, dimensioned lumber, cast iron pipes, and reinforced concrete pipes at the surface. All of these materials appeared to have been placed at the site as fill material and are typical of a construction fill area. BlueRidge observed several areas on the central portions of the site that had been disturbed in the recent past. These disturbed areas appeared to be resultant from a test pit investigation that was conducted at the site by WDP as detailed in a report prepared in November of 1998.

BlueRidge observed several rivulets and small gullies along the western and southern slopes of the fill materials resultant from erosion caused by surface water runoff. The fill materials exposed within the walls and floors of these gullies were similar to those observed scattered on the surface of the site. No items or materials of environmental concern were noted in any of the eroded areas, on the surface of the fill materials, or in areas of the site that had been disturbed as a part of the previous investigation by WDP.

6.2 AST/UST Systems

During the site investigation, BlueRidge did not observe any ASTs, USTs, or appurtenances associated with AST/UST systems at the site. Additionally, no records were noted that ASTs or USTs had been located at the site previously. Finally, the presence of ASTs or USTs is unlikely based on the historic use of the site as vacant land.

6.3 Transformers and PCB Equipment

No transformers or suspect PCB-containing equipment were noted on-site during the site inspection. Several pole-mounted transformers were noted along the northern property boundary on Good Hope Road. None of the transformers were labeled as to PCB content. There were no indications of leaks, or releases, from these transformers. However, any leaks or releases from these transformers would be the responsibility and liability of the Potomac Electric Power Company (PEPCO) which provides electrical service to the area and owns the transformers.

6.4 On-Site Regulated Substance Identification/Inventory

The site is undeveloped. Therefore, there are no on-site regulated substances or activities.

6.5 Area Reconnaissance

BlueRidge conducted a visual inspection of areas abutting and adjacent to the site in order to determine the potential for surrounding properties to impact the environmental integrity of the site.

The site is bounded to the north by Good Hope Road, across which are apartment buildings. The site is bounded to the east by the Skyland Apartments and to the south by a townhouse development where both existing and partially-constructed homes are located. The site is bounded to the east by Fort Stanton Park, which is owned by the National Park Service. The areas of the abutting properties inspected by BlueRidge did not indicate the presence of environmental concerns other than the USTs that are noted in Section 7.1 of this report.

7.0 ENVIRONMENTAL REGULATORY AGENCY INQUIRIES

7.1 Summary of the Regulatory Database Search

BlueRidge obtained an environmental database report from Environmental Risk Information & Imaging Service (ERIIS). This report, attached as Appendix B, is a compilation of several federal and local environmental databases. The regulated facilities identified in the ERIIS report were verified in the field by BlueRidge and adjustments made to the reported distances and directions, as required. These regulated facilities are summarized below.

National Priority Listing (NPL) - The site was not listed. No listings were reported within one mile of the site.

Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS), includes No Further Remedial Action Planned Sites (NFRAP) - The site was not listed. No listings were reported within one-half mile of the site.

Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) facilities - The site was not listed. No TSD facilities were identified within one-half mile of the site.

RCRA Large and Small Quantity Generators (LQG and SQG) - The site was not listed. No LQGs or SQGs were identified within one-quarter mile of the site.

Emergency Response Notification System (ERNS) - The site was not listed. No listings were reported for properties adjacent to the site.

Hazardous Waste Sites (HWS) - The site was not listed. No listings were reported within one mile of the site.

District of Columbia Registered Underground Storage Tank Report (RST) – The site is not listed as an RST facility. Nine off-site RST facilities were identified within one-quarter mile of the subject site. Of these RST facilities, four are identified as having leaking tanks; a discussion of these LRSTs is presented below.

District of Columbia Leaking Underground Storage Tank Report (LRST) - The database identified ten off-site LRST facilities within one-half mile of the subject site. These LRST facilities are listed on Table 1. Of the ten off-site LRST facilities, the closest upgradient LRST is located at the Skyland Apartments, approximately 0.15 miles southeast and upgradient of the subject site. The status of this case is closed and is not of significant concern or likely to negatively impact the site. The closest active LRST case is located over 1/3 mile from the site at 2834 Alabama Avenue, S.E. and, based on distance, is not likely to have any environmental impact on the site.

No Further Remedial Action Planned Sites (NFRAP) - The site is not listed on the NFRAP. There are no NFRAP sites located within one-half mile of the site.

Resource Conservation and Recovery Information System - TSD's subject to Corrective Action (RCRIS-CA) - The site is not listed on the RCRIS-CA. There are no RCRIS-CA sites located within one mile of the site.

7.2 Local Government Agencies

According to information obtained from the District of Columbia Department of Public Works (DPW), no drinking water wells are present on the site. According to DPW representatives, the residences that abut the site are serviced by municipal water provided by the DPW.

BlueRidge has submitted a Freedom of Information Act (FOIA) request to the District of Columbia, Department of Health, Underground Storage Tank Branch concerning the current status of each of the LRST cases indicated on Table 1. At the time of this writing, no response has been received. Any information received after the issuance of this report will be reviewed by BlueRidge and forwarded to KSI.

8.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the findings of this ESA, no on-site environmental concerns were identified. However, a leaking registered underground storage tank was reported to be located at the Skyland apartments, Area #1, located approximately 0.15 miles southeast of the site. This LRST case has been closed by the District of Columbia, and no further action has been required. Based on these facts, BlueRidge does not believe that this LRST site poses a risk to the subject property.

It should be noted that the site has been covered with a large quantity of construction-related fill materials. Observations made during the site inspection and reported in previous studies do not indicate that these fill materials present an environmental concern. However, any suspect materials or containers that may be exposed as a result of development of the site should be assessed by an environmental professional to determine the extent of possible environmental impact and proper disposal procedures for the material. Information on the specific source and composition of the fill materials has been requested from WMATA and will be forwarded to KSI Services, Inc., upon receipt by BlueRidge.

9.0 REFERENCES

ERIIS Environmental Database Search Report, dated December 9, 1998.

United States Geologic Survey/Department of the Interior: 7.5-minute Topographic Quadrangle, Anacostia Quadrangle, photo-revised 1979.

Aerial Photograph obtained from Martin Luther King Jr. Public Library.

Geotechnical Feasibility Study, letter report prepared by Whitlock, Dalrymple, Poson, & Associates, Inc. to Greenhorne & O'Mara, Inc., dated November 20, 1998.

Fort Stanton Feasibility Report, letter report prepared by Greenhorne & O'Mara, Inc. to Dick Knapp, KSI, Inc., dated November 22, 1998.

Merit Title Company correspondence to Fort Stanton, L.P., dated November 30, 1998.

Fort Stanton Database Search, letter report prepared by Greenhorne & O'Mara, Inc., to Richard Knapp, KSI, Inc., dated November 25, 1998.