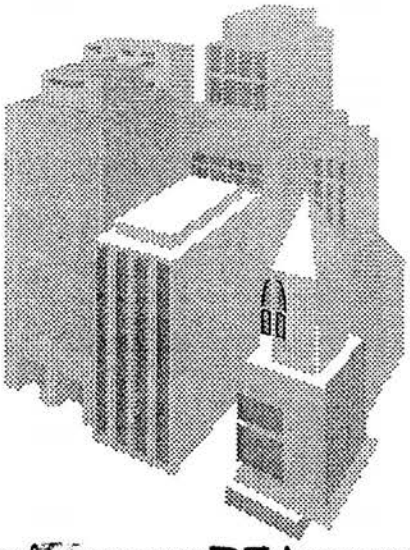
Voglezon Consulting
Federal Environmental Review
900 Sero Estates Drive
Ft Washington, Maryland 20744
Phone 301.203.5056
Fax 301.203.7420

Environmental Assessment And Finding of No Significant Impact

Receiving Home for Children Washington, DC

D. C. Department of Human Services
Youth Services Administration

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D.C. OFFICE OF ZONING
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March 12, 2001

BZA
Case No 16859
Exhibit No. 9

Board of Zoning Adjustment
District of Columbia
CASE NO.16859
EXHIBIT NO.9A1

ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

Receiving Home for Children Site
(Proposed Location for Youth Services Center)
1000 Mount Olivet Road, NE
Washington, D.C.

OJP/CPO Reference Number DC-001

Prepared for:

District Of Columbia
Department Of Human Services
Youth Services Administration
8300 Riverton Court
Laurel, Maryland 20724

Prepared by:

Diversified Engineering & Architecture
&
VOGLEZON CONSULTING
900 Sero Estates Drive
Ft Washington, Maryland 20744
301-203-5056

ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

DESCRIPTION OF ACTION

The proposed project would construct a new, 95,000 square-foot, state-of-the-art 80-bed center for detained youth at 1000 Mount Olivet Road in Northeast, Washington, DC. This site previously held the deteriorated and functionally obsolete detention center known as the Receiving Home for Children. The Youth Services Center will house three separate components designed to deal with the detained youth:

1. An 80-bed secure juvenile detention facility with related program and support functions
2. A Police Processing Center; and
3. A Community Services diagnostic/day-treatment center.

The U.S. Department of Justice, Office of Justice Programs, Corrections Program Office has determined that the construction of the Youth Services Center will not significantly affect the quality of the human environment. Less than significant impacts would occur to historic and archaeological resources, natural resources, water quality, air quality, utility services, transportation, noise, and land use. Therefore, it has been determined that the proposed project will not have a significant affect on the quality of the human environment and it is not expected that an Environmental Impact Statement will be prepared for this proposal.

PUBLIC NOTICE AND COMMENTS

The notice of availability of the draft Environmental Assessment and FONSI was published in the *Washington Post, Metro Section* on Sunday, January 28, 2001 and Monday, January 29, 2001. A period of thirty days was allowed for review and comments. No comments were received.

RECOMMENDATION

Based on this assessment and finding of no significant impact (FONSI), we recommend that no environmental impact statement be prepared.

Project Manager

Receiving Home for Children, Washington, DC
Environmental Assessment

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SUMMARY

Introduction

The District of Columbia Department of Human Services, Youth Services Administration (YSA) develops and administers a citywide system of services for delinquency prevention and control that contributes to the protection of the community and the rehabilitation of youth. YSA proposes to construct a state-of-the-art Youth Services Center that provides a safe and secure environment for detained offenders, a police juvenile processing center, and a diagnostic/day-treatment center for detained youth. The facility is to be constructed in the District of Columbia on the site of the old Receiving Home for Children, a juvenile detention facility, which was closed in 1995 due to deteriorated conditions and was subsequently demolished in June 2000.

The proposed Youth Service Center is the subject of this Environmental Assessment (EA). The report has been prepared in accordance with the Office of Justice Programs/Corrections Program Office's *Program Guidance on Environmental Protection Requirements, March 1, 2000.* The *Guidance* has been prepared under the provisions of the National Environmental Policy Act of 1969 (NEPA) as amended, and the Council on Environmental Quality (CEQ) regulations implementing the NEPA [40 CFR 1500-1580].

The environmental issues addressed in this EA were identified through early public involvement; through consultations with local, state and federal agencies; and by the project team, which includes the YSA, the District of Columbia Housing Authority (DCHA), and contractor personnel who have had experience with projects of similar scope. Existing conditions and potential environmental impacts were determined.

History and Background

The Youth Service Administration is responsible for providing security, supervision, residential and community support services for committed and detained juvenile offenders and Juvenile Persons in Need of Supervision (PINS). Clients are involved in a variety of educational, therapeutic, recreational and cultural enrichment programs. YSA has adopted a holistic, family oriented approach, which emphasizes youth/parental responsibility. From 1986 to present, the District of Columbia has endeavored to create a juvenile justice system that meets the treatment needs and goals of the District's youth, as well as, meets the industry juvenile justice standards and best practices.

The Oak Hill Youth Center in Laurel, Maryland is currently the only juvenile detention facility operated by the District of Columbia since the closure in 1993 of the Cedar Knoll Center and the Receiving Home for Children in 1995.



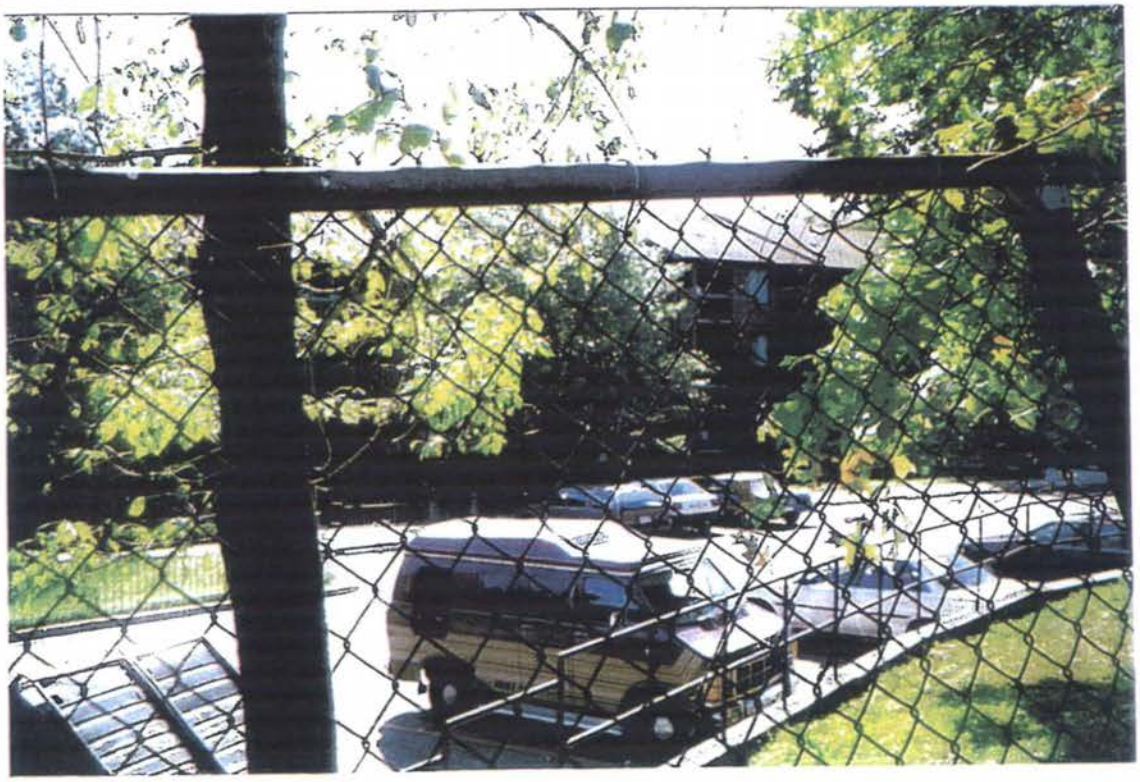
Receiving Home for Children Site: 1000 Mount Olivet Street, NE, Washington, DC



Receiving Home for Children - Demolished Site



Receiving Home for Children Site: Commercial Development Adjacent to Site



Receiving Home for Children Site – Residential Development adjacent to site

SECTION 1: PURPOSE OF AND NEED FOR THE PROJECT

1.1 Purpose of the Project

The proposed project would construct a new, 95,000 square-foot, state-of-the-art 80-bed center for detained youth at 1000 Mount Olivet Road in Northeast, Washington, DC. This site previously held the deteriorated and functionally obsolete detention center known as the Receiving Home for Children. The Youth Services Center will house three separate components designed to deal with the detained youth:

1. An 80-bed secure juvenile detention facility with related program and support functions
2. A Police Processing Center; and
3. A Community Services diagnostic/day-treatment center.

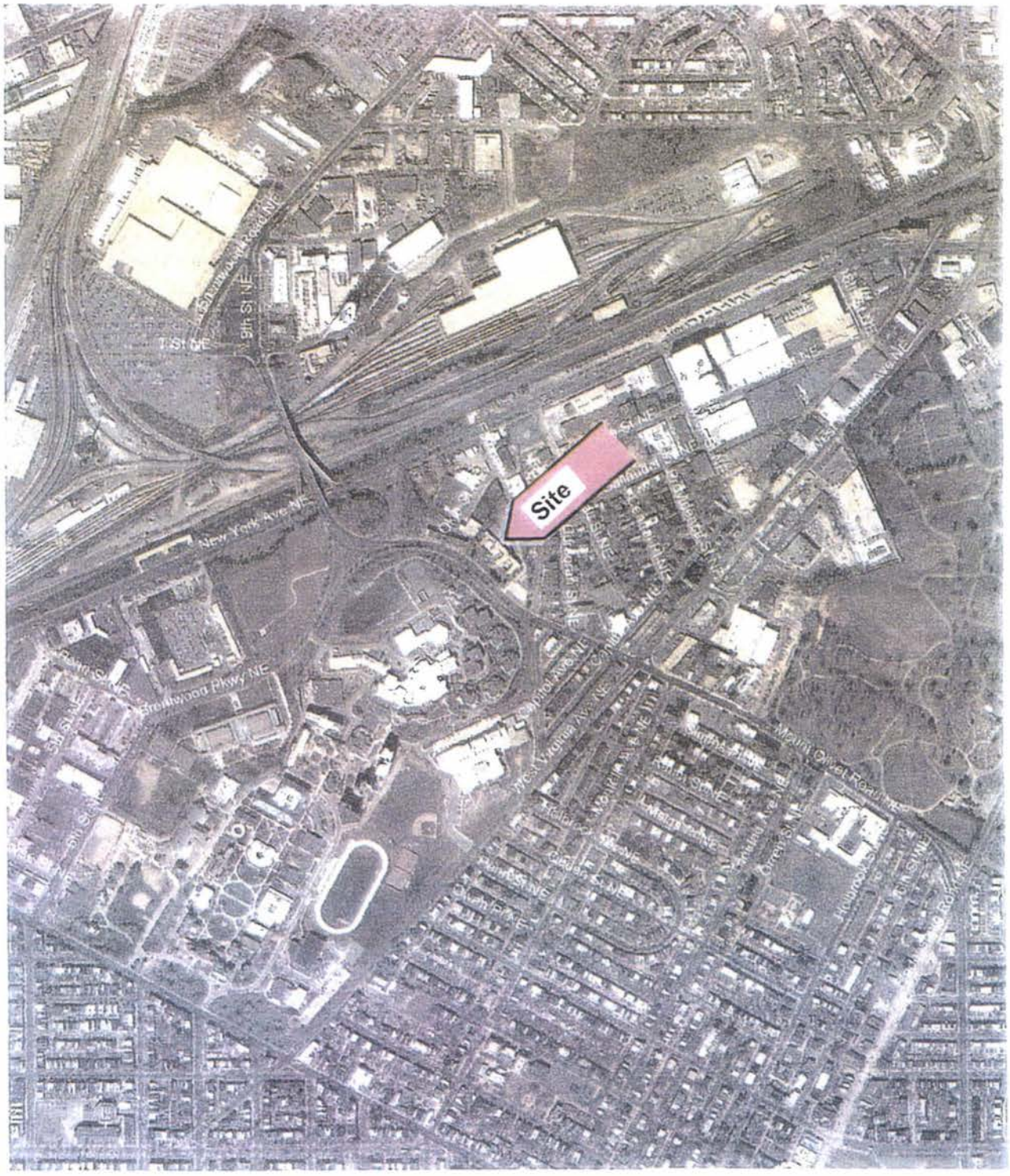
1.2 Need for the Proposed Action

The proposed project is needed to meet Jerry M Consent Decree obligations and fulfill the urgent need for additional accommodations and improved facilities for the District youth. The current and only juvenile detention facility operated by the District of Columbia is the Oak Hill Youth Center. This center presently houses and commingles detained and committed youth, which is legally prohibited.

The proposed facility would offer state-of-the-art services and accommodations for detained but uncommitted youth. The center would provide an appropriate setting for the delivery of designated services to District youth following their arrest by the D. C. Police Department and pending other referral and disposition by the Superior Court.

The proposed action would improve administrative and operational efficiency and would facilitate communication and interaction among staff. The Police Processing Center, which would be a component of the Youth Services Center, would be the new location for the operations currently conducted at the Central Processing Facility at 501 New York Avenue, NW, Washington, DC.

1000 Mt. Olivet Road, NE

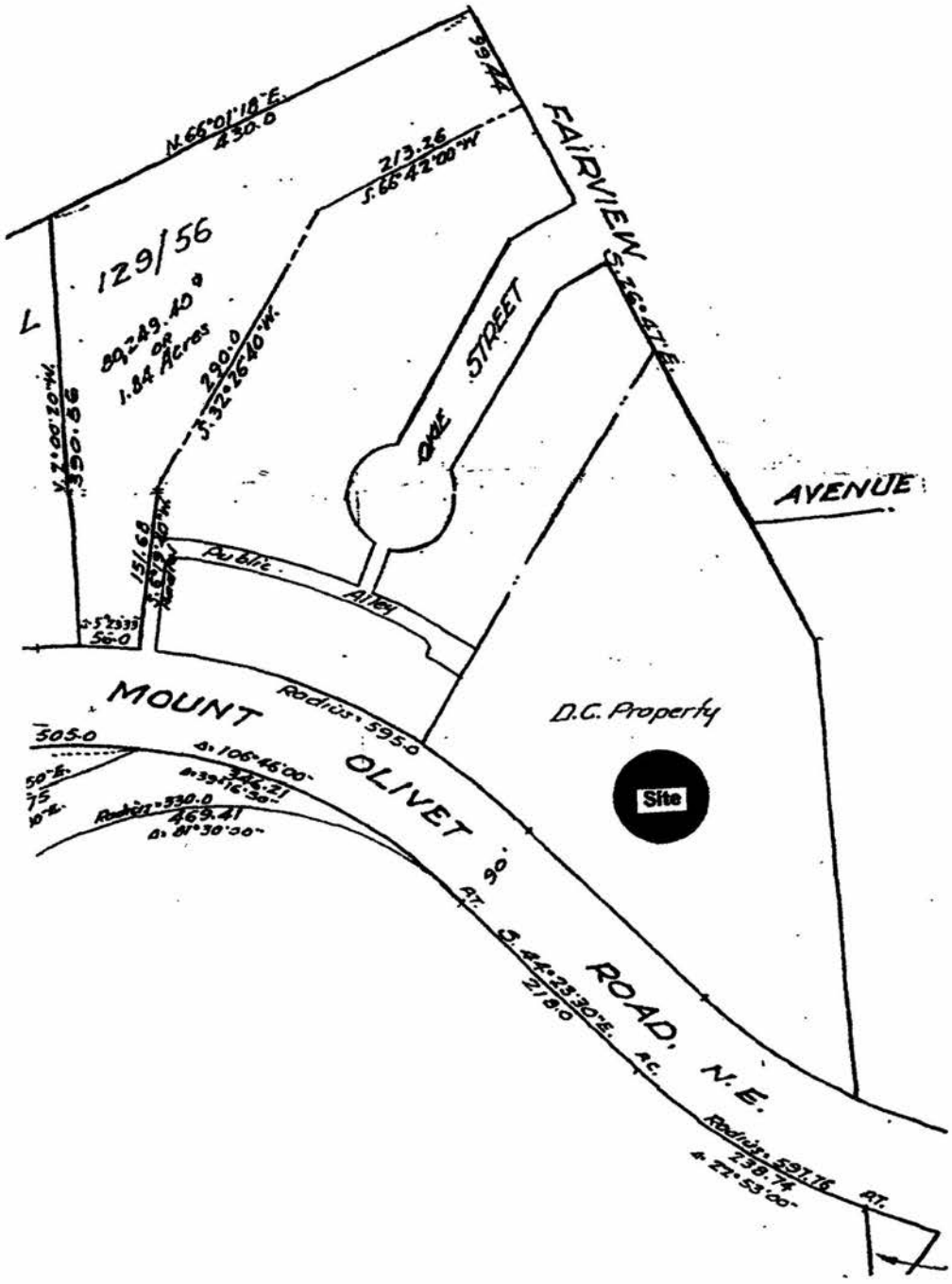


400 0 400 800 Feet

Source: DC Office of Planning, Planning and Design Information Technology

Receiving Home for Children
1000 Mount Olivet Road, NE
Washington, DC

AERIAL PHOTOGRAPH



Receiving Home for Children
1000 Mount Olivet Street, NE
Washington, DC

SECTION 2: ALTERNATIVES

2.1 Description of the Proposed Action/Preferred Alternative

The proposed action is to construct an 80-bed Youth Services Center to replace the Receiving Home for Children, which was demolished due to obsolete and deteriorated conditions. The Government of the District of Columbia owns the current site, located at 1000 Mount Olivet Road.

2.1.1 Functional Components

The proposed Youth Services Center would consist of approximately 95,000 gross square feet distributed as follows:

a. Juvenile Detention Component 78,000 square feet
b. Community Services Component 13,000 square feet
c. Police Processing Center 4,000 square feet

2.1.2 Facilities

Juvenile Detention Component
This component is designed to house detained but uncommitted youth and will provide a safe and secure environment for the juveniles. The proposed 80-bed capacity center will have a full range of support services including education, library, counseling, recreation, medical services, visiting, dining and food services. Building design will incorporate the following support areas:

- Resident Housing
- Public Areas
- Administration
- Staff Support
- Security Operations
- Intake
- Visit/Activity Center
- Education Services
- Recreation
- Medical and Dental Services
- Food Services
- Laundry
- Maintenance/Warehouse

District of Columbia Police Processing Center
Intake screening, assessment and evaluation of youth who have been apprehended or have come into contact by the District of Columbia Police Department will occur here. This function will allow for the relocation of the existing operations conducted in the basement of the Central Processing Facility within the District.

Community Services
In keeping with the Youth Services Administration goal of delinquency prevention and control, a community services component has been added which will target youth who are not physically

receiving these services will be residents in the community either living at home, in foster care, or in group/shelter homes. Services will be provided in a healthy, safe and caring environment and will include small group educational instruction, individual tutoring, group and individual counseling, active and passive recreation, and snacks. Program areas will be totally separated from the juvenile detention component and there will be no mixing of client populations.

2.1.3 Appropriateness of Preferred Alternative

Accessibility: The proposed facility is well located with respect to accessibility to community courts and residents of the District of Columbia for whom the facility will be constructed. The current and only juvenile detention facility is located outside of the District of Columbia, in Laurel, Maryland.

Building Design: The proposed facilities would consist of a compact aggregation of low-rise buildings, physically linked to encourage greater staff and resident interaction. This plan would also allow the buildings to be configured for improved economies in building services distribution and space occupancy efficiencies. This arrangement of clustered inter-connected buildings would result in a more compact site, reduced construction cost, and greater green and recreation space within the site.

Topography: The site slopes thirty feet from it's highest to lowest point, which could create a positive in building design by allowing the facility to be designed in a manner consistent with the residential development in the community. It is proposed that resident housing and program areas will be constructed at the lower elevations with public functions at the upper levels, thereby lowering the profile of the building and creating a non-institutional image.

Land Use: The site of the old Receiving Home for Children is owned by the Government of the District of Columbia. It is approximately three acres and originally served a juvenile detention function; consequently the land use would remain the same, which allows for the construction of this much needed juvenile detention center in the shortest reasonable timeframe.

Legal Issues: Construction of a new detention facility is critical so that the District of Columbia might meet Jerry M Consent Decree obligations, operate within industry standards, and seek accreditation from the American Correctional Association.

2.2 No-Action Alternative

Under the No-Action alternative, YSA would continue to use the single, existing juvenile detention facility located in Laurel, Maryland. This facility operates within a legally prohibited status since it houses and commingles detained and committed youth. Due to their different legal statuses, separate programs and approaches to disciplinary issues is mandated and cannot be achieved under the current operation.

The No-Action alternative would not allow for improved efficiencies that the new state-of-the-art complex would afford. The existing facilities would not allow the Youth Services

Administration to support the changing technology required to meet to meet its regulatory mission. As discussed in Section 1, Need for the Proposed Action, the now demolished detention facility at the Receiving Home for Children was functionally obsolete and could not be efficiently or economically renovated or upgraded.

2.3 Other Alternatives Considered and Dismissed

Two alternative sites were considered for the construction of the new Youth Services Center, which will replace the now demolished juvenile detention facility previously located at 1000 Mount Olivet Road. Those sites are briefly describes below:

D. C. Village Site. This site located at #4 D. C. Village Lane is within ½ mile of the Blue Plains water treatment facility. The buildings on this site are currently used as accommodations for seniors.

Independence and 19th Street, SE. This site is vacant and is located one block from the D. C. Armory.

The selection team determined that these sites did not meet one or more of the criteria necessary to proceed further, such as minimum developable acreage, appropriate zoning and land use, and site control.

Table 1: Comparison of Alternatives

ISSUES	NO-ACTION ALTERNATIVE	1000 MOUNT OLIVET RD SITE
Geology, Soils and Topography	No impacts to geology, soils, and topography will occur at existing YSA facility	Minimal impact to geology, soils and topography. Steep slopes will be avoided to the maximum extent possible
Water Resources	No impacts to surface or ground water will occur at existing YSA facility	Minor impact to surface water might occur during construction phase. Erosion and sedimentation measures will be implemented. Minor impact to ground water expected
Vegetation and Wildlife	No impact to vegetation and wildlife	No impact to wildlife; minor impact to vegetation during demolition
Threatened and Endangered Species	No impact to threatened and endangered species at existing YSA facility	No impact to threatened and endangered species at Mount Olivet site
Wetlands	No impact to wetlands at existing YSA facility	No impact to wetlands will occur at the Mount Olivet site
Air Quality	Air quality at existing YSA facility is expected to remain the same	Short-term impacts may result from fugitive dust during construction
Noise	Noise levels are expected to remain the same	Residences in the neighborhood may be impacted temporary construction noise; no long-term noise impacts expected
Wild and Scenic Rivers	No impact to wild and scenic rivers	No impacts to wild and scenic rivers
Floodplain Management	No impact	Site located in Zone C, outside of 100-year floodplain. Minimal impact

Table 1: Comparison of Alternatives

ISSUES	NO-ACTION ALTERNATIVE	MOUNT OLIVET ROAD SITE
Hazardous Substances	No impacts are anticipated from hazardous materials or wastes or other potential contaminants from existing YSA facility	One documented hazardous waste site is located within 1000 feet of the Mount Olivet site. Two documented operations handling conventional fuels or chemicals of an explosive or flammable nature are located within ½-mile of Mount Olivet site
Farmland Protection	No impacts to farmland	No impacts to farmland
Land Use	YSA will continue to use the existing facility in the Laurel area	No direct impacts associated with this site; development is consistent with existing land use plans
Displacement	No families have been displaced	Mount Olivet site has been vacant; no direct impact
Community Facilities ➢ Health care ➢ Education	There will be no impacts to community facilities and services	There will be no impacts to community facilities and services
Environmental Justice	No environmental justice issues identified	No environmental justice issues identified
Historic Preservation	There will be no effects to known or potential historic properties or cultural resources	No effect on historic resources. Demolished building not eligible for inclusion in the National register
Archeological Resources	No impact on archeological resources	No impact on archeological resources

Table 1: Comparison of Alternatives

ISSUES	NO-ACTION ALTERNATIVE	MOUNT OLIVET ROAD SITE
Transportation	No impact	Minimal impact to surrounding area; development expected to generate minimal additional a.m. and p.m. traffic
Waste management	Waste generation will remain unchanged	Waste handling procedures for general and medical wastes will be implemented
Legal	Current YSA commingles detained and committed youth which is legally prohibited	New facility at Mount Olivet Road would separate the detained from the committed youth, thereby meeting Jerry M Consent Decree obligations

SECTION 3: ENVIRONMENTAL IMPACT

3.1 Natural and Physical Environment

3.1.1 Soils and Topography

The site is made up of an Urban land mapping unit, which consists of areas where more than 80% of the surface is covered by asphalt, concrete, buildings, or other impervious surfaces[1]. The site lies at an elevation of approximately 110 feet above mean sea level and slopes thirty-five feet from its highest to its lowest point.

3.1.2 Water Quality

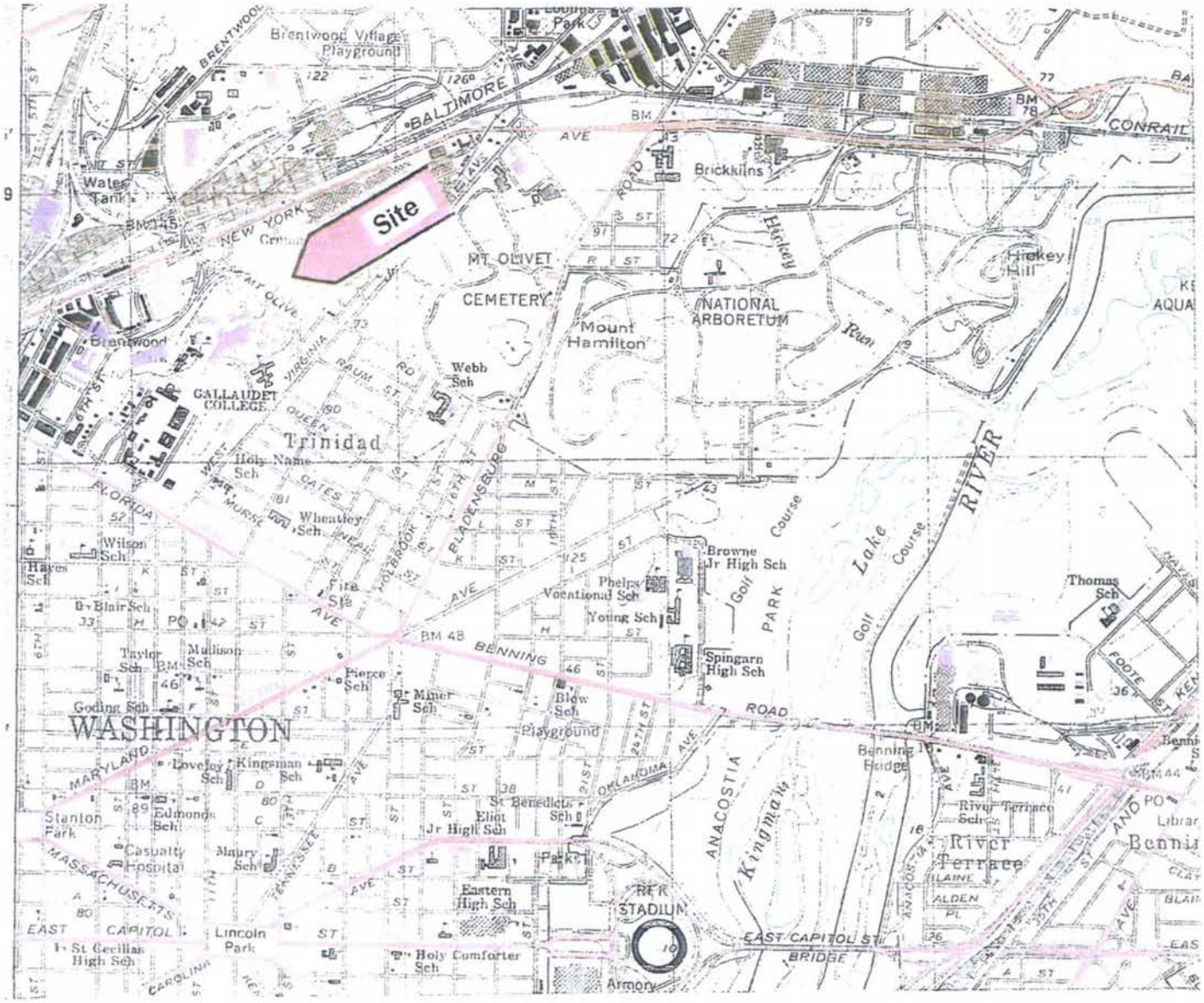
Water resources can be subdivided into ground and surface water. Ground water refers to all the water found below the ground's surface that can come directly from rainwater or from seepage from the sides and bottoms of lake and streams. There are seventy designated sole source aquifers nationwide, however, there are no sole source aquifers in the District of Columbia. Ground water will not be used as a source of drinking water at the proposed Youth Service Center.

Groundwater on the site, in the vicinity of an underground storage tank (UST), was analyzed for total petroleum hydrocarbons (TPH) calibrated for diesel range organics (DRO). Bassett Environmental, Inc of Harrisburg, Pennsylvania using Geoprobe borings, collected the groundwater samples. A perched groundwater zone was encountered at approximately 4 feet below ground surface at one of the borings. Results of the analysis for TPH-DRO indicate that the groundwater in the vicinity of the on-site UST has not been impacted by petroleum. See Appendix 1.

There is no surface water on site, but surface drainage is toward the Anacostia River, which is approximately 1½ miles away. The Anacostia River feeds into the Potomac River basin and the Chesapeake Bay estuarine system. Growth in the Chesapeake Bay watershed has resulted in a steady decline in water quality in the bay and its tributaries. Excessive nutrient enrichment (phosphorous and nitrogen) from point and non-point sources is a principal cause for the water quality's degradation.

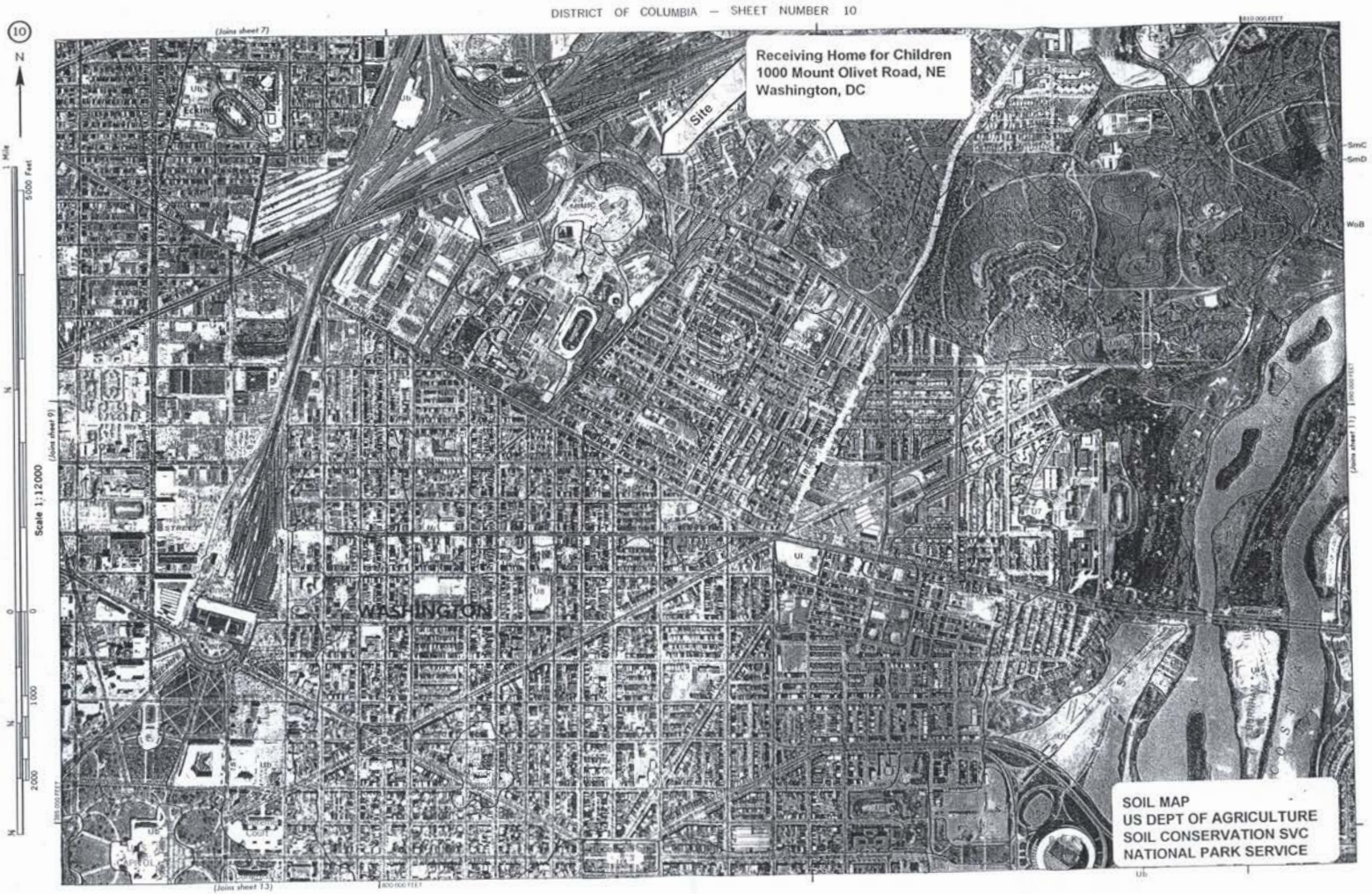
An agreement to restore the Anacostia River has been signed with the District of Columbia, the State of Maryland, Montgomery and Prince George's Counties, the Metropolitan Council of Governments and the Interstate Commission on the Potomac River Basin. The District has made improvements to its combined sewer system to reduce overflows to the Anacostia River. New storm water management regulations have been established to reduce the amount of pollutants

[1] Soil Survey of District of Columbia, United States Department of Agriculture, Soil Conservation Service, In cooperation with United States Department of the Interior, National park Service, National Capital Parks



WASHINGTON EAST QUADRANGLE
DISTRICT OF COLUMBIA – MARYLAND
7.5 MINUTE SERIES (TOPOGRAPHIC – BATHYMETRIC)

Receiving Home for Children
1000 Mount Olivet Street, NE
Washington, DC


DISTRICT OF COLUMBIA — SHEET NUMBER 10
Receiving Home for Children
1000 Mount Olivet Road, NE
Washington, DC
Site
SOIL MAP
US DEPT OF AGRICULTURE
SOIL CONSERVATION SVC
NATIONAL PARK SERVICE
Scale 1:12000
WASHINGTON
(Joins sheet 7)
(Joins sheet 9)
(Joins sheet 11)
(Joins sheet 13)
SmC
SmD
WoB
Ub
Ul

washed into both the Potomac and Anacostia Rivers. The contractor hired to design and build the proposed Youth Services Center will be required to provide erosion and pollution control facilities in accordance with the District of Columbia Health Regulations.

The District of Columbia Water and Sewer Authority (WASA) provides retail water and wastewater services to residents of the District. WASA buys its drinking water from the Washington Aqueduct, a division of the Army Corps of Engineers. The Aqueduct treats the water and WASA distributes it throughout the District. Drinking water for the entire District comes from the Potomac River.

WASA's Blue Plains Wastewater treatment plant, located in Southwest Washington, is the largest wastewater treatment facility in the world[2] and is the single largest point source of nitrogen load to the Chesapeake Bay. This treatment plant is owned and operated by the District of Columbia. The average flow through the plant is approximately 330 million gallons/day while the capacity of the plant is about 370 million gallons/day[3]. Consequently, construction of the proposed Youth Services Center will not adversely impact wastewater treatment and disposal; neither is it expected to overload the system.

3.1.3 Unique Natural Features

Unique natural features are generally rare geological features that are of special social/cultural, economic, educational, aesthetic or scientific value. A site survey showed no unique natural features within the proposed project area.

3.1.4 Vegetation and Wildlife

Following demolition, the site was cleared and there is currently no vegetation or wildlife visible. There are no unique natural features on site. Additionally, this project was coordinated with the Fish and Wildlife Service who found that there would be no impact to any potential wildlife or their habitat.

3.1.5 Threatened and Endangered Species

When federal financial assistance is sought for a project that has the potential to affect endangered species or critical habitats, compliance with the Endangered Species Act of 1973 is required. The U. S. Department of the Interior, Fish and Wildlife Services (USFWS) was asked to provide comments on the potential for any federally or state-listed endangered or threatened species or other sensitive species to occur on the site. The USFWS concurred that no such species are known to exist within the project impact area, however, the agency did express

[2] D. C. Water and Sewer Authority, Department of Waste Water Treatment
[3] Mr. Walter Bailey, Director, Department of Wastewater Treatment, Blue Plains

concerns regarding the protection of wetlands and recommended avoiding wetland impacts. See Appendix 2.

3.1.6 Protection of Wetlands

Wetlands are areas that are inundated or saturated by surface or groundwater at a frequency or duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

Executive Order 11990 requires that all federal executive agencies refrain from supporting construction in wetlands whenever there is a practicable alternative. The District of Columbia has identified 54 wetland locations. A review of the map entitled *"District of Columbia Wetlands Conservation Project, Wetland Delineation"* prepared by the District of Columbia Environmental Regulation Administration (DC-ERA) (October, 1996) shows that the site for the proposed Youth Service Center is not located within an area that could potentially affect any designated wetlands. The project area is more than ¾-mile from the nearest wetland, which is a pond along Rhododendron Valley Road at the National Arboretum.

Ms. Jerusalem Bekele with the Water Quality Division of the DC-ERA was contacted about the proposed construction project and verbally concurred that the action will not affect designated wetlands. Written response has not been received at this time. See Appendix 3 for documentation.

3.1.7 Air Quality

Air quality data is collected by the District of Columbia Department of Health, Environmental Health Administration. Data is collected using EPA Certified equipment and procedures at sites that meet EPA siting criteria.

Ambient air quality is determined by measuring ambient pollutant concentrations and comparing the concentrations with the corresponding standard. The EPA published National Ambient Air Quality Standards (NAAQS), which have been adopted by the Environmental Health Administration as District standards.

The District of Columbia operates an ambient air-monitoring network that measures the six pollutants for which criteria have been established by the federal government. Those pollutants are:

- Ground-level Ozone
- Carbon Monoxide
- Sulfur Dioxide
- Nitrogen Dioxide
- Particulate Matter
- Lead

Air quality control areas are designed as "attainment" – meeting the NAAQS – or "non-attainment"- not meeting the NAAQS – for each of the six pollutants for which NAAQS has been established.

Currently, the District of Columbia meets five of the six standards. Ground level ozone is the pollutant for which the City has not yet reached the federal health standard. Consequently, the Environmental Protection Agency (EPA) Office of Air quality Planning Standards has designated Washington DC as a "non-attainment" area for Ozone.

In the past decade the ground-level ozone levels have been decreasing. Concentration levels have gone down between 10% and 17 % in the past ten years and this is a direct result of actions taken to reduce emissions from fuels, factories, commercial establishments, and from automobiles.

Demolition activities at the site increased airborne particles in the immediate vicinity on a short-term basis. Construction activities associated with the proposed project will result in short-term impacts to air quality. Fugitive dust will be generated during construction, wind erosion, and vehicular activities. Watering of the disturbed area will minimize such impacts. Since additional project activities will not include the development of any commercial or industrial land uses, there will be no contribution to point source pollutants.

3.1.8 Coastal Zone Management

The coastal zone includes the coastal salt waters and adjacent shorelands, including inter-tidal areas, barriers or other islands, estuaries and land whose use would have a significant impact on coastal waters. There are no coastal barriers in the District of Columbia.

3.1.9 Wild and Scenic Rivers

No rivers were identified on or near the site. The National Park Service listing for Wild and Scenic Rivers was reviewed and there are no designated wild and scenic rivers in the District of Columbia.

3.1.10 Floodplain Management

Executive Order 11988 discourages Federal agencies from initiating or participating in new construction within areas having flood hazards. Therefore, it is essential that projects, for which federal support may be requested, be located outside the 100-year floodplain.

The proposed Youth Services Center is in an area identified as "Zone C" on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM)[4]. This is an area

[4] Federal Emergency Management Agency, National Flood Insurance Program, Flood Insurance Rate Map: District of Columbia, Washington, DC, Community Panel Number 110001 0020 B, Effective Date: November 15, 1985.

defined as having "minimal flood hazard." Flood hazard insurance is not required. See Appendix 4.

3.1.11 Hazardous Substances, Nuisances and Site Safety

3.1.11.1 CERCLIS

The U.S Environmental Projection Agency (USEPA) keeps information on hazardous substances in response to the Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA) which covers all environmental media: air, surface water, ground water, and soil. A list, the Comprehensive Environmental, Response, Compensation and Liability Information System (CERCLIS), has been developed which contains information on hazardous waste assessments and remediation from 1983 to the present.

Twenty-three sites in the District of Columbia are included in the US-EPA's list as of October 25, 2000 (See Appendix 5). The old Receiving Home for Children does not appear on that list. However, *Crummell School Site* at 1912 Gallaudet Street, NE, which is within 1000 feet of the proposed development, is on the CERCLIS.

3.1.11.2 National Priorities Listing (NPL)

The NPL is a subset of CERCLIS and identifies sites for priority cleanup under the Superfund program. Sites are added from the CERCLIS according to a hazard ranking system that seeks to identify high priority sites. The Receiving Home for Children is not on the NPL neither is there any NPL properties within a two-mile radius of the site. See Appendix 6.

3.1.11.3 Asbestos

Asbestos-containing materials were identified in several areas of the now demolished Receiving Home for Children. The ACM was abated in accordance with federal and local methods prior to the demolition of the buildings. See Appendix 1.

3.1.11.4 Lead-Based Paint (LBP)

On January 7, 2000 ATC Associates, Inc conducted a lead-based paint inspection at the Receiving Home for Children and found several surfaces with lead concentrations in quantities sufficient to constitute a health or environmental hazard. LBP was disposed of in accordance with EPA Resource Conservation and Recovery Act regulations. See Appendix 1.

3.1.11.5 Thermal/Explosive Hazards

This section relates to sites located near operations handling conventional fuels or chemicals of an explosive or flammable nature. Mark Hughes, Chemist, District of Columbia Bureau of

Hazardous Material and Toxic Substances, has confirmed that the Receiving Home for Children was not a hazardous waste generator. However, there are five facilities within a ½ mile radius of the site that do generate hazardous wastes, namely:

- Gallaudet University to the south
- Park Service Maintenance Yard west of the site at 500 New York Avenue
- Three auto body shops east of the site, all of which are located on Mount Olivet Road.

Mr. Hughes confirmed that there have been no reported spills in the area.

A list of businesses reporting under SARA, Title III has been reviewed and the following two notifiers are located within one half mile of the project:

1. Washington Metropolitan Area Transit Authority - Brentwood Yard at 610 T Street, NE, Washington, DC which stores Sulfuric acid in batteries and propylene glycol in an above ground storage tank
2. Bell Atlantic, Inc at 935 V Street, NE, Washington, DC which stores sulfuric acid

See Appendix 7.

3.1.11.5 Airport Clear Zones[5]

This section refers to sites located in runway Clear Zones at civil airports, and Clear Zones and Accident Potential Zones at military airfields.

The Receiving Home for Children is more than nine miles from Andrews Air Force Base (AAFB), a military airfield, and approximately six miles from Reagan National Airport. The site is outside the "Clear Zones" and "Accident Potential Zones" of AAFB and outside the "Clear Zones" of Reagan National Airport.

3.1.12 Noise[6]

The degree of acceptability of the noise environment at a site is determined by the outdoor day-night average sound level (DNL) in decibels (dB). The noise environment is determined by assessing the site's exposure to three major sources of noise: aircraft, roadways, and railways. The combined noise effect will come under one of three categories.

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5 Air Installation Compatible Use Zone Study, Andrews Air Force Base

Washington National Airport Noise Compatibility Study, August 1990, Revised December 1993

6 The Noise Guidebook, The U.S. Department of Housing and Urban Development, Office of Community Planning and Development

- **Acceptable:** the DNL does not exceed 65 decibels.
- **Normally Unacceptable:** DNL is between 65 and 75 decibels. The noise exposure requires attenuation.
- **Unacceptable:** the DNL is above 75 decibels. In this case the noise exposures at the site is so severe that the construction cost to make the indoor noise environment acceptable may be prohibitive and the outdoor environment would still be unacceptable.

Ambient noise heard at the site would be generated from Reagan National Airport, Andrews Air Force Base, Amtrak rail, CSX Transportation, Mount Olivet Road and New York Avenue. Ambient noise estimations made for 1000 Mount Olivet Road was found to be 67 decibels, which is in the "Normally Unacceptable" range. See noise assessment worksheets and noise contours at Appendix 8. To reduce the noise impact, attenuation can be provided by any or a combination of the following methods: 1.) use or barriers or berms, 2.) site design, 3.) acoustical construction.

3.1.13 Farmland Protection

The purpose of the Farmland Protection Policy Act is to minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural use, and to ensure that federal programs are administered in a manner that would be compatible with State and local government.

The site for the proposed construction lies within a developed residential community of the District of Columbia, and was the original location for the now demolished juvenile detention facility. Construction will not contribute to the irreversible commitment of prime, unique or State or local designated farmlands for non-agricultural uses.

3.1.14 Energy Impacts

The proposed YSA facility will use a combination of electricity and natural gas as energy sources. Actual electric and natural gas demand will depend on final architectural design and the resulting percentage of electricity required versus natural gas.

The site is close to transit, shopping, services and employment locations that minimize energy use. The proposed state-of-the-art facility would lessen the demand for energy by incorporating energy efficient products.

New construction replaces the now outdated buildings and installs modern heating and cooling systems, replaces antiquated features with energy efficient structures and makes general

improvements to maximize energy efficiency. Design of the proposed state-of-the-art structures would take full advantage of energy saving measures such as insulation, window design and placement, lighting, heating, and cooling.

3.2 Social Environment

3.2.1 Land Use

The site for the proposed Youth Services Center is approximately 3 acres and is located in Ivy City in Ward 5. Land use for the project site is "local public facilities" defined as "land and facilities occupied by the District of Columbia." Since the site was previously used as a juvenile detention center, there will be no change in land use.

Land uses adjacent to the site are production and technical employment, medium density residential, and institutional (Figure ----, Land Use Map). South of the site is the Gallaudet University, a coeducational institution for students who are deaf or hearing-impaired; to the west and east is low and moderate income rental and single-family residential development; to the north are several warehouses.

3.2.2 Displacement

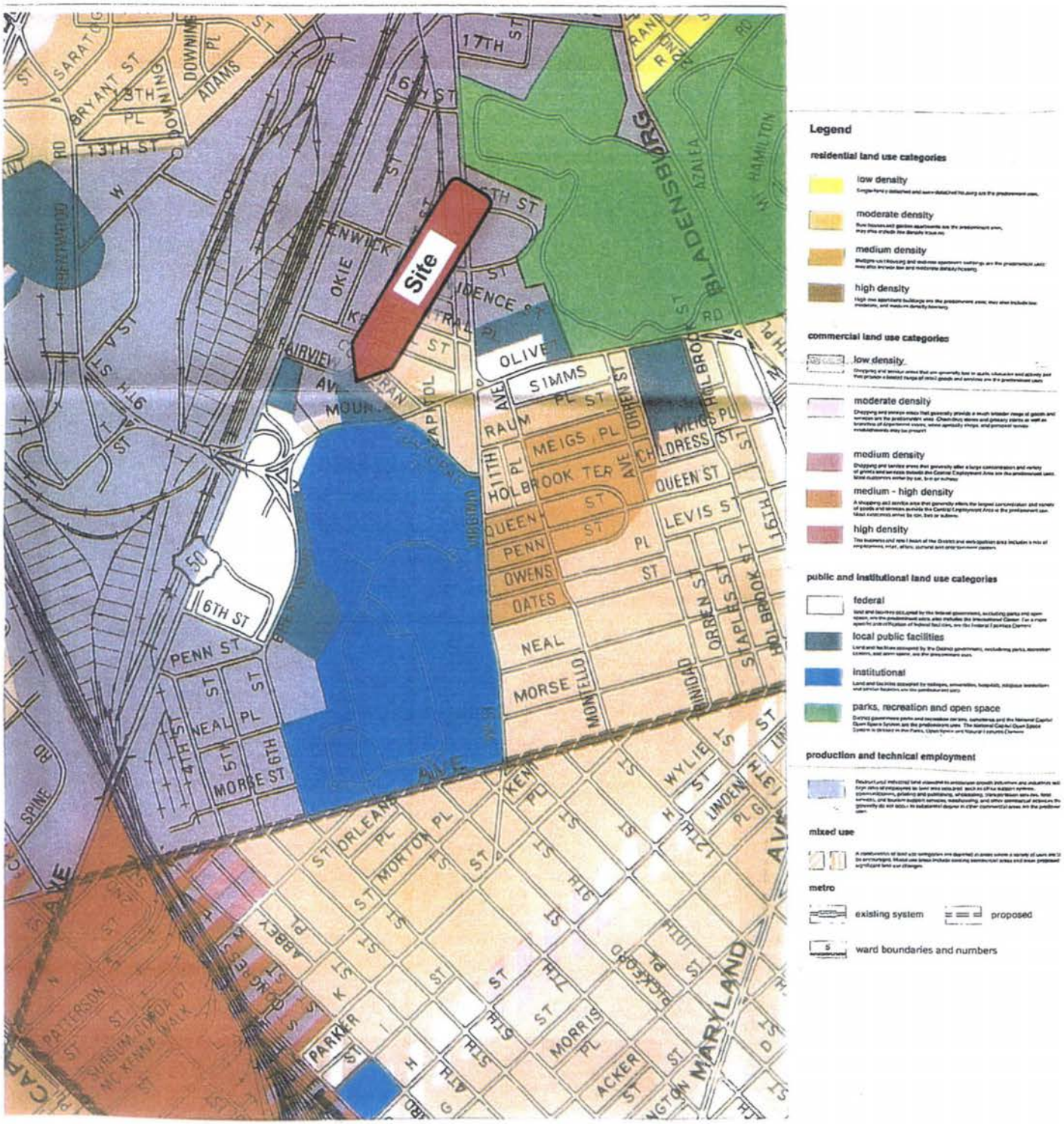
Displacement refers to the dislocation of people, businesses, institutions or community facilities as a result of a project. The old Receiving Home for Children had been vacant for five years prior to its demolition in June 2000. No families will be displaced to construct the new facility.

3.2.3 Health Care

Medical and dental services will be provided on site to the residents of the proposed Youth Service Center. Medical services will include initial medical screening of residents and treatment of minor conditions, as well as any ongoing medical needs required during the detention stay. Major medical services, including specialty and inpatient hospital care, will be provided in the community. The District of Columbia General Hospital is about two miles from the site, while Providence Hospital is just over two miles away at 1150 Varnum Street, NE.

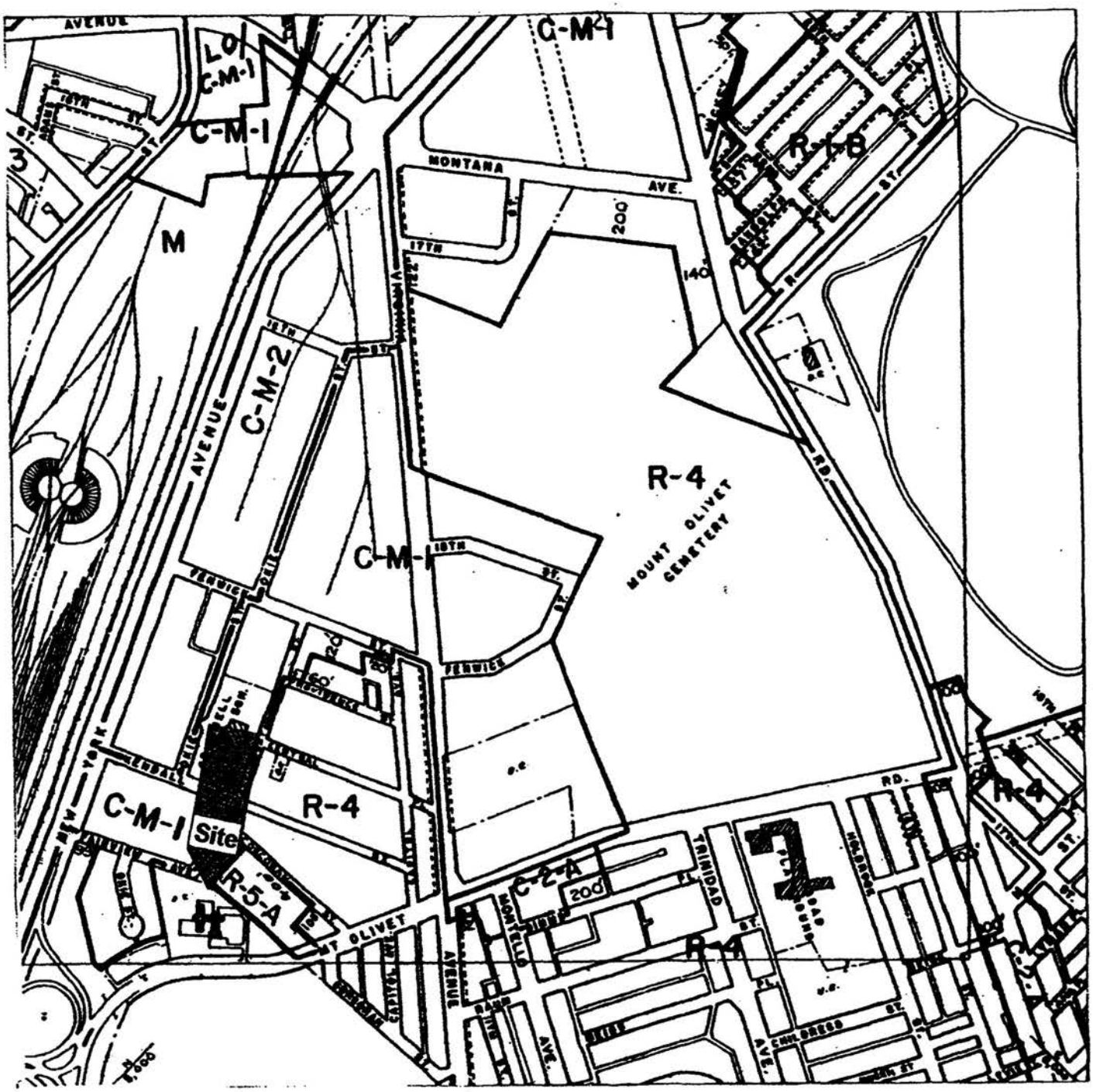
3.2.4 Education

The residents of the Youth Service Center will be educated on site. Instructional programs will be designed according to resident need and will be consistent with the educational program determined to be appropriate to the facility mission and resident needs. There will be no impact to the public schools system.



DISTRICT OF COLUMBIA
GENERALIZED LANDUSE MAP

Receiving Home for Children
1000 Mount Olivet Street, NE
Washington, DC



ZONING MAP OF THE DISTRICT OF COLUMBIA
EFFECTIVE MAY 12, 1958
CONTAINING AMENDMENTS THROUGH APRIL 1, 1996

Receiving Home for Children
1000 Mount Olivet Street, NE
Washington, DC

3.2.5 Public Safety

Police: The site for the proposed action is in Police Service Area 507, which is located in the 5th District. The Fifth District, which has jurisdiction over much of the northeast quadrant of the District of Columbia is located one block south of the intersection of New York Avenue and Bladensburg Road, NE at 1805 Bladensburg Road, less than one mile from the site. The Metropolitan Police Force at the Fifth District Police Headquarters will respond to calls-for-service at the proposed Youth Service Center. The 5th District has experienced a noticeable decrease in crime during the period 1993 to 1998. See Appendix 9.

Fire: The DC Fire Department has four fire stations within District Five and these are: Engine Company 10 and Truck 13 at 1342 Florida Avenue, NE; Engine Company 12 at 2225 5th Street, NE; Engine Company 17 at 1227 Monroe Street, NE; and Engine Company 26 and Truck 15 at 1340 Rhode Island Avenue, NE. All, but one fire station, are less than one mile from the site and could respond to emergencies at the Center. The residents have adequate access to police, fire and emergency medical services.

3.2.6 Environmental Justice in Minority and Low-Income Populations

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies and activities on minority and low-income populations."

EPA's Office of Environmental Justice defines environmental justice as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local and tribal programs and policies." The goal of fair treatment is to identify disproportionately high and adverse effects and to identify alternatives that may mitigate these impacts.

This environmental assessment analyzes demographic data for Ward 5, the location for the proposed Youth Services Center. Ward 5 is located predominantly in the northeast section of the District of Columbia. During 1950 to 1970, the ward's population changed from predominantly White to Black. Between 1960 and the mid 1970s, the Black composition increased from 40% to 80%. The racial composition of the ward remained constant from 1980 through 1990. During this period, Blacks and other races made up 90% of the ward's population, while Whites made up 10%. This compared with 68% and 30% respectively, citywide.

The number of households in the ward remained substantially the same from 1980 to 1990. The mean household size in the ward decreased from 2.7 in 1980 to 2.5 in 1990. In 1990, 48% of the households were owner-occupied, compared with 47% in 1980. The citywide figures were 39% in 1990 and 35% in 1980. In 1990, the population in Ward 5 was 75,100, a decrease of 7,500 persons (9%) from 1980 – 1990. In the same period the citywide population decreased by 4%.

The proposed project is located in census tract 88.3. The per capita income in 1998 for that census tract was $18,999 compared to a citywide figure of $29,383. The median household income in the same period was $30,508 compared to $43,011 citywide.[7]

3.3 Cultural Environment

3.3.1 Historic Preservation

"Historic properties" as defined by the National Historic Preservation Act (36 CFR 800) are any prehistoric or historic district, site, building structure or object included in, or eligible for inclusion in, the National Register of Historic Places.

The proposed construction site at 1000 Mount Olivet Road is not within any historic districts. The project was reviewed according to Federal Regulations at 36 CRF Part 800, "Protection of Historic Properties," and was found to have no effect on historic resources. See Appendix 10 for historic resource clearance from the District of Columbia Historic Preservation Officer.

3.3.2 Archeological Resources

No recognized or potential archeological sites were identified on the project site or within the area of potential effect

3.4 Infrastructure and Waste Management

3.4.1 Transportation

Vehicular movement related to construction activity could temporarily and minimally affect transportation around the project site. Once the facility is operational, the minimal number of additional a.m. and p.m. peak hour trips generated is not expected to have a significant adverse impact on the road network serving the project site.

The project site is accessible by public and private transportation. The Metro system network is generally prompt and convenient with approximately forty-five routes with three stations on two routes – the Red and the Green Lines. Three Metro rails are within the Ward. The closest metro-station is located at Rhode Island Avenue, about one mile from the site. The D3, D4 and D8 metro buses operate within walking distance of the site.

[7] D. C. Office of Planning/State Data Center. Source Data: U. S. Census Bureau and Claritas

3.4.2 Waste Management

Two different types of waste will be generated at the proposed YSA facility. These waste types are general wastes and medical wastes. General waste will typically include a varying, non-homogeneous mixture of paper goods, corrugated items, plastic, food scraps, glassware, metal waste, and other miscellaneous substances. General waste will be picked up on a regular basis by licensed waste haulers and disposed of either in local sanitary landfills or at incineration facilities.

A recycling plan will be established. Recyclables will be removed from the receptacles on a regular basis and when sufficient quantities are obtained, will be sold to appropriate vendors.

Medical wastes will be collected on a regular basis by licensed medical waste haulers and transported to approved treatment/disposal facilities for processing.

Since this new, 80-bed Juvenile Detention Facility replaces the larger, 228-bed Receiving Home for Children, the proposed development will be adequately served by the existing waste disposal system and will not exceed the design capacity of the current facility.

3.5 Potential Effects of Construction Activities

3.5.1 Particulate Matter

The construction phase of the project might increase airborne particles in the immediate vicinity on a short-term basis. Since, additional project activities will not include the development of any commercial or industrial land uses, there will be no contribution to point source pollutants. During the progress of the work, resultant dirt and debris will be removed and the site left in a condition satisfactory to the Government of the District of Columbia representative.

3.5.2 Erosion and Pollution Control

Erosion control facilities to prevent soil erosion will be installed in accordance with the Health Regulations of the District of Columbia. All operations will be handled in such a manner as to prevent and/or minimize contamination of watercourses by sedimentation or other pollutants.

3.5.3 Water and Electricity

Temporary electrical lines will be installed, and connections to existing electrical services will be made in accordance with the DC Electrical code. Approval for connections to water mains will be obtained from the DC Water and Sewer Authority.

3.5.4 Noise

A temporary disruption of the ambient environment was created during demolition because of the increased levels of noise and air pollution. Major sources of noise during the construction

phase are on-site heavy equipment operations and additional vehicular traffic. Temporary increased noise levels are expected during construction but would generally be confined to the daytime hours, which should not adversely impact the community. Due to the scope of the project, it is not anticipated that the activities will contribute significantly to the community noise levels once construction is complete.

3.6 Environmental Impacts and Mitigation Measures

Direct, indirect and cumulative impacts were assessed for the preferred alternative, the Mount Olivet site. Direct impacts are those that may occur on the site as a direct and immediate result of the proposed construction. Indirect impacts are those impacts that occur off site or on site but at a later time as a result of the proposed project. Cumulative impacts are those direct and indirect impacts that occur from other projects and actions in the vicinity in conjunction with the proposed action.

The proposed action involves the construction of a new Juvenile Services Center with associated Policy Processing Center, and Community Services Center. Possible mitigation measures that could be implemented to offset the impacts of the project are also discussed.

Soils and Topography
A direct impact of the construction is the alteration of topography and soils because of grading activities. Erosion of soils on steep slopes may lead to sedimentation in nearby streams. A detailed erosion and sedimentation plan will be developed prior to construction, following the District of Columbia' "Erosion and Sediment Control Handbook"[8]. Any indirect impacts from soil erosion are anticipated to be minimal. No cumulative impacts to soil and topographic conditions are expected from area development in addition to the proposed construction.

Wetlands
Based on the proposed development there will be no direct impact to wetlands. Any increase in erosion or sedimentation that might impact wetlands and streams will be mitigated through best management practices. Effective storm water management and erosion control will minimize indirect impacts.

Noise
Direct, short-term noise impacts would result from construction activities during development of the YSA facility. Noise from construction equipment can be reduced by the construction of temporary noise barriers, such as the stock piling of topsoil or other materials in strategic locations. Avoiding times of day or days of the week when noise exposures will be more objectionable can minimize annoyance from construction activity.

Indirect roadway traffic noise impacts would occur due to development at the site. Traffic noise impacts on roadways near the proposed site are expected to be slight and mitigation is not warranted.

[8] Department of Consumer and Regulatory Affairs, Soil Resources Branch

Air Quality

Construction of the proposed YSA facility could have temporary effects on air quality. The air pollutant of greatest concern during construction would be particulate matter that would be generated during site grading, construction, wind erosion, and vehicular activities. Implementation of fugitive dust control, and mitigation measures such as watering of the disturbed area during construction activities, will minimize impacts. Fugitive dust concentrations resulting from construction activities are not expected to exceed federal or state ambient air quality standards for particulate matter.

Land Use

The proposed land use is compatible with existing land use. The direct impact was the removal of a vacant, dilapidated building, which will be replaced by an aesthetically pleasing structure. There could be an indirect impact to the land uses in the vicinity of the proposed project. The introduction of additional employees and visitors to the Youth Services Center will result in increased patronage at nearby commercial establishments, and thereby lead to the possible redevelopment of the neighborhood. No mitigation is warranted.

3.7 State Environmental Policy Act

On October 18, 1989, the District of Columbia enacted D. C. Law 8-36, "District of Columbia Environmental Policy Act of 1989." The purpose of the law is to require environmental impact statements: "to provide for the full consideration of potential environmental impacts in the process of reviewing and approving major actions."[9]

In accordance with D. C. Law 8-36, Section 7, the proposed project would be exempt from the Act if a Finding of No Significant Impact were made in accordance with the National Environmental Policy Act.

3.8 Intergovernmental Review

This project was reviewed with several state, regional, and local agencies including:

a) United States Department of the Interior, Fish and Wildlife Service; the agency agreed that "no proposed or federally listed endangered or threatened species are known to exist within the project impact area."

b) D. C. Department of Consumer and Regulatory Affairs, Historic Preservation Division; the agency concurred that the demolition and redevelopment of the Receiving Home for Children will have no effect on historic resources.

[9] June 5, 1989 Committee Report on Bill 8-8, page 5

c) D. C. Department of Health, Environmental Health Administration, Water Quality Division, concurred that no designated wetlands would be impacted by the development.

SECTION 4: AGENCIES AND PERSONS CONSULTED

4.1 YOUTH SERVICES ADMINISTRATION

Mr. Ira Holland
Special Assistant
Youth Services Administration
8300 Riverton Court
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4.2 DISTRICT OF COLUMBIA HOUSING AUTHORITY

Ms. Angel Reynolds
Project Manager
Development and Modernization Division
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4.3 DISTRICT OF COLUMBIA DEPARTMENT OF HEALTH

Ms. Jerusalem Bekele, Program Manager
Environmental Health Administration
Bureau of Environmental Quality, Water Quality Division

Ms. Gayle England
Environmental Health Administration
Bureau of Environmental Quality, Water Quality Division

Mr. Mark Hughes, Chemist
Bureau of Hazardous Materials and Toxic Substances

4.4 UNITED STATES DEPARTMENT OF THE INTERIOR

Mr. Robert J. Pennington, Assistant Field Supervisor
Chesapeake Bay Field Office
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Annapolis, Maryland 21401

Mr. Andrew Moser, Endangered Species Biologist
Ms. Charisa Morris
U. S. Fish and Wildlife Service
Division of Endangered Species
177 Admiral Cochran Drive
Annapolis, Maryland 21401

4.5 DISTRICT OF COLUMBIA DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS

Ms. Carolyn Fuller, Acting Director
Mr. Steve Raiche, State Historic Preservation Officer
Historic Preservation Division
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4.6 OFFICE OF COUNCIL MEMBER CAROL SCHWARTZ

Mr. Adam Maier
202-724-8194

4.7 DISTRICT OF COLUMBIA EMERGENCY MANAGEMENT AGENCY

Dr. Michele Penick
2000 14th Street, NW
Washington, DC 20001

4.8 MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Mr. Tom Masog
Transportation Section
14741 Governor Oden Bowie Drive
Upper Marlboro, MD 20772

4.9 DISTRICT OF COLUMBIA DEPARTMENT OF PUBLIC WORKS

Mr. Peter Moreland
Bureau of Traffic Services
202-671-2381

4.10 DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

Mr. Walter Bailey, Director
Department of Waste Water Treatment
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4.11 CONSULTANT

Mr. Fred Moyer
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847-559-8500 ext. 23

APPENDIX 1

HAZARD REPORT

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Supplemental Environmental
& Limited Subsurface Services
Old Receiving Home for Wayward Boys
1000 Mt. Olivet Road, N.E.
Washington, D.C.
ATC Project Number: 12960.00066

Prepared for:
Mr. Kenneth Narain
District of Columbia Housing Authority
Office of Risk Management
1133 North Capital Street, N.E.
Washington, D.C. 20002

Prepared by:
ATC Associates Inc.
8989 Herrmann Drive
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January 26, 2000

ATC ASSOCIATES INC.

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January 26, 2000

Mr. Kenneth Narain
District of Columbia Housing Authority
Office of Risk Management
1133 North Capital Street, N.E.
Washington, D.C. 20002

RE: **Supplemental Environmental & Limited Subsurface Services**
Old Receiving Home for Wayward Boys
1000 Mt. Olivet Road, N.E.
Washington, D.C.
ATC Project Number: 12960-00.0066

Dear Mr. Narain:

ATC Associates Inc. (ATC) is pleased to submit the attached Supplemental Environmental Services report for the referenced site. ATC conducted a survey for asbestos-containing materials (ACMs), assumed polychlorinated biphenyls (PCBs), and lead-based paint (LBP) at the site on January 7, 2000. In addition, ATC performed a Limited Subsurface Investigation at the site on January 12, 2000. This report summarizes ATC's survey procedures and analytical findings at the site.

ATC appreciates the opportunity to be of service for this project. If you have any questions regarding information in this report or if we can be of further assistance, please contact our Columbia office at (410) 381-0232.

Sincerely,

ATC ASSOCIATES INC.

Matthew J. Eberl
Project Engineer

Dawn E. Suszynski
Environmental Specialist

Jeffrey S. Stein, P.G.
Senior Project Manager

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1	*SITE LOCATION MAP*
2	*BORING LOCATION MAP*

EXECUTIVE SUMMARY

ATC performed Supplemental Environmental Services at the Old Receiving Home for Wayward Boys, located in Washington, D.C. ATC conducted a survey for asbestos-containing materials (ACMs), assumed polychlorinated biphenyls (PCBs), and lead-based paint (LBP) at the site on January 7, 2000. In addition, on January 12, 2000, ATC performed a Limited Subsurface Investigation at the site in the vicinity of the on-site underground storage tank (UST). This report summarizes ATC's survey procedures and analytical findings at the site.

ATC collected a total of 44 bulk samples of suspect ACM, resulting in 28 analyses. The samples were analyzed by Environmental Hazards, Inc. (EHS) laboratory, located in Richmond, Virginia using polarized light microscopy (PLM) according to the Environmental Protection Agency (EPA) methods 600/M4-82-020 and 600/R-93/116. Table 1 provides a listing of ACM identified as the result of ATC's survey.

The lead-based paint (LBP) survey was performed in general accordance with the 1995 Housing and Urban Development's (HUD) "Guidelines for the Evaluation and control of Lead-based Paint Hazards in Housing" including the 1997 revised Chapter 7 sampling protocol in one unit in each type of building.

ATC tested a total of 45 surfaces and performed 6 calibrations before and after unit testing, with a portable Niton XL X-Ray Fluorescence Spectrum Analyzer. The results of the analysis are discussed in Section3.0.

No suspect PCB containing transformer was observed on the property, and fluorescent lighting fixtures that contain ballasts were observed along the corridors of the building (see drawings for locations and approximate quantities). There was no indication of other PCB containing equipment located at the site.

In order to complete the Limited Subsurface Investigation at the site, ATC chose four locations on which to install Geoprobe borings (B-1 through B-4) and collect soil and groundwater samples in the vicinity of the on-site UST. Based on local hydro-geologic conditions, ATC was unable to collect groundwater samples from three of the four boring locations. Figure 2, located in Appendix D, illustrates the Geoprobe and sample locations. Copies of the field boring logs are included as Appendix E.

Soil samples SS-1B through SS-4 were analyzed in the laboratory for total petroleum hydrocarbons (TPH) calibrated for diesel range organics (DRO) via Environmental Protection Agency (EPA) Method 8015. Copies of laboratory analytical reports are included in Appendix F. The results of the analysis indicated that all four soil samples contained concentrations of TPH-DRO below the laboratory detection limit of 1.0 ppm. Table 2 summarizes the analytical results for the TPH-DRO concentrations detected in the soil samples.

Groundwater sample GW-2 was analyzed in the laboratory for TPH-DRO using EPA Method 8015. According to the results of the analysis, the TPH-DRO concentration in the groundwater sample was 0.24 mg/l. Table 3 summarizes the analytical results for the TPH-DRO concentrations detected in the groundwater sample.

Based on the results of the field analysis, ATC has determined that the soil in the immediate vicinity of the on-site UST consists of tight, low-permeability, reddish-brown to red colored clay. This layer of low-permeability clay extends from a depth of approximately one foot below ground surface (bgs) to the boring completion depths ranging from 16 feet bgs to 20 feet bgs. The exception to this was the layer of reddish-tan, coarse sand encountered at boring B-2 extending from a depth of approximately 1 foot bgs to 4 feet bgs. The layer of coarse sand was located directly above the layer of clay and may be indicative of fill material. A perched groundwater zone was encountered at approximately 4 feet bgs at boring B-2 and groundwater sample GW-2 was collected from this location.

The District of Columbia Department of Health – Environmental Health Administration (DCDOH-EHA)-UST Division designates an action limit of 100 mg/kg TPH-DRO concentration in soil. Based on the field screening and laboratory analysis performed on the on-site subsurface soil, ATC has concluded that the soil in the vicinity of the boring locations has not been impacted by petroleum. Based on the presence of the low-permeability clay surrounding the UST, ATC has concluded that if a release from the UST has occurred, the extent of the petroleum impacted soil would be limited to the immediate vicinity of the UST.

Due to probe refusal prior to reaching the groundwater table, ATC was unable to collect groundwater samples from borings B-1, B-3, and B-4. Groundwater sample GW-2 was collected from the perched water zone encountered at boring B-2. According to the laboratory analysis, sample GW-2 exhibited a TPH-DRO concentration of 0.24 mg/l. The DCDOH-EHA-UST Division designates an action limit of 1.0 mg/L TPH-DRO concentration in groundwater. The detected concentration in sample GW-2 is below the designated action limit. Based on the results of the groundwater sample analysis, and based on the absence of petroleum impacted soil at the site, ATC has concluded that the shallow groundwater in the vicinity of the on-site UST has not been impacted by petroleum.

ATC recommends that the on-site 5,000-gallon UST be emptied of remaining product and the UST be excavated and removed from the site according to the DCDOH-EHA-UST Division regulations.

Based on ATC's conclusions regarding the on-site soil and groundwater in the vicinity of the UST, ATC recommends no further action at the site in regards to petroleum-impacted soil and/or groundwater.

1.0 PURPOSE AND SCOPE OF SERVICES

The site consists of an unoccupied three-story building including a boiler room of approximately 15,000 square feet in area, located at 1000 Mt. Olivet Road, N.E. in Washington, D.C. The unoccupied property has a brick exterior and is fenced along the perimeter of the building. The purpose of this project was to conduct Supplemental Environmental Services and a Limited Subsurface Investigation at the site in preparation for planned demolition and/or renovation activities. Specifically, ATC Associates Inc. (ATC) was contracted to provide the following services:

A. Conduct inspections of the interior and exterior of the aforementioned building, including common areas, basement, and representative roof areas;

B. Identify suspect asbestos-containing material (ACM) and lead-based paint (LBP) that may be impacted by the proposed demolition and renovations;

C. Collect samples of suspect asbestos-containing materials for laboratory analysis, and test various surfaces at the site for the presence of LBP utilizing a portable Niton XL X-Ray Fluorescence spectrum analyzer.

D. Conduct a comprehensive survey for the presence or absence of suspect polychlorinated biphenyls (PCBs).

E. Conduct a Limited Subsurface Investigation in the vicinity of the on-site UST. The Limited Subsurface Investigation is discussed in Sections 5.0 through 9.0.

The survey was conducted by an EPA accredited Asbestos Building Inspector/Lead Inspector Technician.

2.0 ASBESTOS-CONTAINING MATERIALS

The following is a list of suspect ACMs identified during ATC's inspection of the buildings:

- Floor Tile & Associated Mastics
- Wallboard & Associated Joint Compounds
- Window Caulking
- Spline Ceiling Tile & Associated Glue Dots
- Fire Door Insulation
- Pipe and Boiler Insulation
- Mudded Pipe Fittings
- Light Reflector Sheeting
- Roof Flashing
- Roof Tar Membrane

ATC collected a total of 44 bulk samples of suspect ACM, resulting in 28 analyses. The samples were analyzed by Environmental Hazards, Inc. (EHS) laboratory, located in Richmond, Virginia using polarized light microscopy (PLM) according to the Environmental Protection Agency (EPA) methods 600/M4-82-020 and 600/R-93/116. EHS's laboratory participates in the National Voluntary Laboratory Accreditation Program, a quality assurance program for polarized light microscopy (NVLAP ID #101882-0), and is accredited by the National Institute of Standards and Technology.

By EPA definition, any material containing greater than one percent asbestos is considered an asbestos-containing material and must be handled according to OSHA, EPA, and applicable local regulations.

Table 1 provides a listing of ACM identified as the result of ATC's survey.

3.0 LEAD PAINT

The lead-based paint (LBP) survey was performed in general accordance with the 1995 Housing and Urban Development's (HUD) "Guidelines for the Evaluation and control of Lead-based Paint Hazards in Housing" including the 1997 revised Chapter 7 sampling protocol in one unit in each type of building. Suspect LBP containing surfaces tested at the site included:

- Interior walls
- Ceilings
- Baseboards
- Door Components
- Window Components
- Stair Components
- Pipes
- Closet Components
- Cabinets
- Elevator Doors
- Radiators
- Sliding Gates

District of Columbia Act 11-438, which became D.C. law 11-221 on April 9, 1997, defines a LBP as "any paint or other surface coating containing lead or lead in its compounds in any quantity exceeding 0.5% of the total weight of the material or more than seven-tenths of a milligram per square centimeter (0.7 mg/cm^2), or in any quantity sufficient to constitute a health or environmental hazard."

The Occupational Health and Safety Administration (OSHA) Lead Exposure in Construction Standard (29 CFR 1926.62) applies to all construction activities where lead is present. The standard also applies where lead is present at levels less than 0.50% by weight or 0.7 mg/cm^2. The Standard requires the employer to assure that no employee is exposed to lead at concentrations greater than 50 micrograms lead per cubic meter of air averaged over an eight-hour period. The Standard further requires the employer to make a determination of its employee's potential exposure to lead. This initial determination is typically achieved by performing personal air monitoring during various "representative" construction activities. The level of personal and respiratory protection is modified based upon the results of the monitoring.

Debris resulting from LBP and lead-containing material removal must be disposed of according to EPA Resource Conservation and Recovery Act (RCRA) requirements. RCRA requires that representative material samples from the waste stream be subjected to Toxic Characteristic Leachate Procedure (TCLP) analysis. Resulting waste debris found to contain lead in concentrations greater than five parts per million (ppm) must be treated as hazardous waste.

ATC tested a total of 45 surfaces and performed 6 calibrations before and after unit testing, with a portable Niton XL X-Ray Fluorescence Spectrum Analyzer. XRF testing revealed lead concentrations equal to or greater than 0.7 mg/cm^2 for the following surfaces:

- Metal Doors - 1st Floor Corridor, and Exterior
- Wood Doors - 1st Floor Corridor
- Metal Window Sashes - 1st Floor Corridor
- Metal Window Casings - Corner Lodging Area, 1st Floor
- Concrete Wall Baseboards - 1st Floor Corridor
- Wood Partition Wall - Corner Lodging Area, 1st Floor
- Drywall Walls - 2nd Floor Corridor
- Metal Stairs Newel-posts - 1st Floor Stairwells and Auditorium
- Metal Stairs Risers - 1st Floor Corridor
- Metal Door Jambs - All Rooms throughout 1st Floor
- Metal Elevator Doors - 1st Floor Corridor
- Metal Vertical Pipes - Boiler Room
- Metal Door Casing - Boiler Room

XRF testing of the following components revealed lead concentrations of less than 0.7 mg/cm^2, but greater than the limit of detection for the instrument used:

- Metal Window Casing - 1st Floor Corner Room
- Metal Door - 1st Floor Room and Closet Area, Auditorium
- Wood Closet Shelves - 1st Floor Closet Area
- Metal Radiators - 1st Floor Corridor
- Metal Ceiling - 1st Floor Exit Corridor
- Metal Window Sash - Exterior
- Concrete Walls - 1st Floor Corridor

The results of XRF testing on the remaining surfaces at the subject buildings were below the 0.01 mg/cm^2 detection limit for the instrument utilized.

4.0 POLYCHLORINATE BYPHENYLS (PCBs)

No suspect PCB containing transformer was observed on the property, and fluorescent lighting fixtures that contain ballasts were observed along the corridors of the building (see drawings for locations and approximate quantities). There was no indication of other PCB containing equipment located at the site.

5.0 LIMITED SUBSURFACE INVESTIGATION

5.1 Project Introduction

On January 12, 2000, ATC conducted a Limited Subsurface Investigation at the Old Receiving Home for Wayward Boys, located in Washington, D.C. The Site Location Map, Figure 1 in Appendix D, illustrates the location of the subject site. The intent of this task was to provide subsurface investigation data for the site.

5.2 Project Methodology

Four Geoprobe borings were advanced at the site to determine if the soil and groundwater has been effected by the 5,000-gallon UST located behind the building on the northern portion of the site. The soil and groundwater sampling program was designed to provide data for the purpose of gaining a general understanding of the potential contaminant concentration at the site.

5.3 General Site Description

The investigation focused on the northern portion of the site in the general vicinity surrounding the on-site UST. In an attempt to determine the amount fuel and/or water contained in the UST, ATC measured the depth of fluid in the tank. Based on this measurement, ATC estimates that approximately 2,000 gallons of fuel and/or water remain in the UST.

The site is located on the southwestern portion of the United States Geological Survey (USGS) 7.5 Minute Series Washington East, D.C.-Maryland Topographic Quadrangle (produced in 1965 and photorevised in 1979). According to the map, the site lies at an elevation of approximately 110 feet above mean sea level. Surface drainage on the site is generally to the east towards the Anacostia River, located approximately 1.6 miles from the site. ATC did not identify any potable water wells at the site or in the site vicinity. In addition, ATC did not identify any surface water bodies located at the site. Reportedly, water is supplied to the site by the Washington Suburban Sanitary Commission (WSSC).

6.0 SUBSURFACE INVESTIGATION ACTIVITIES

6.1 Scope of Assessment

ATC chose four locations on which to install Geoprobe borings (B-1 through B-4) and collect soil and groundwater samples. Based on local hydro-geologic conditions, ATC was unable to collect groundwater samples from three of the four boring locations. Figure 2, located in Appendix D, illustrates the Geoprobe and sample locations.

- B-1 was placed in the grass-covered area approximately three feet southeast of the UST location. Soil sample SS-1B was collected and analyzed from boring location B-1. ATC was unable to collect a groundwater sample from this boring location.

- B-2 was placed in the grass-covered area approximately three feet northwest of the UST location. Soil sample SS-2 and groundwater sample GW-2 were collected and analyzed from boring location B-2.

- B-3 was placed in the grass-covered area approximately three feet northeast of the UST location. Soil sample SS-3 was collected and analyzed from boring location B-3. ATC was unable to collect a groundwater sample from this boring location.

- B-4 was placed in the concrete paved area approximately thirteen feet east of the UST location. Soil sample SS-4 was collected and analyzed from boring location B-4. ATC was unable to collect a groundwater sample from this boring location.

- Due to the presence of the on-site building and an underground gas utility line located southwest of the UST, ATC was unable to collect soil or groundwater samples from areas southwest of the UST.

6.2 Geoprobe Sampling Procedures

The Geoprobe system is a hydraulically powered percussion/probing machine used to advance sampling tools through unconsolidated soils. This system provides for the rapid collection of soil and groundwater samples at shallow depths while minimizing the generation of investigation-derived waste materials.

The probe-drive sampler serves as both the driving point and the sample collection device and is attached to the leading end of the probe rods. To collect a soil sample, the sampler is pushed or driven to the desired sampling depth, and the stop pin is removed, allowing the piston and drive point to retract as the sample barrel is pushed into undisturbed soil. The probe rods are then retracted, bringing the sampling device to the surface. For a groundwater sample, a recessed screened drive point is driven or pushed into the subsurface. Once at the proper depth, the drive point is pulled up a short distance to expose the screen. A HDPE tube is then inserted into the rod and a sample is collected using a peristaltic pump. The Geoprobe contractor was Bassett Environmental, Inc. of Harrisburg, Pennsylvania.

6.2 Sample Collection and Analytical Methods

The following describes the soil and groundwater sampling and analysis procedures from the Geoprobes. All soil samples were collected and analyzed according to EPA protocols. These protocols include personnel protective equipment, sampling devices and techniques, sampling containers, preservatives, chain-of-custody documentation, and laboratory techniques. The samples were analyzed by Maryland Spectral Services, Inc. located in Baltimore, Maryland.

6.3.1 Soil Sample Collection and Analysis

The soil samples were transferred from the sampling column to analyte-appropriate glassware supplied by the analytical laboratory. These soil samples were then placed in a cooler on ice pending laboratory analysis.

Each four-foot soil column was visually inspected by an ATC Field Geologist and scanned with a photoionization detector (PID). The PID relates the concentration of total volatile organic compounds (VOCs) in the soil to an isobutylene calibration standard. The PID was also used to monitor for VOCs in the worker breathing zone. PID readings are illustrated on the soil boring logs located in Appendix E.

Soil samples SS-1B through SS-4 were analyzed in the laboratory for total petroleum hydrocarbons (TPH) calibrated for diesel range organics (DRO) via Environmental Protection Agency (EPA) Method 8015. The samples were analyzed with standard turn-around time (five business days). Copies of laboratory analytical reports as included in Appendix F.

6.3.2 Groundwater Sample Collection and Analysis

Based on local hydro-geologic conditions, ATC was unable to collect groundwater samples from borings B-1, B-3, and B-4. A perched groundwater table was encountered at boring location B-2. A peristaltic pump with dedicated silicon and HDPE tubing was used to extract the groundwater sample from boring B-2. The dedicated HDPE tubing was lowered down the casing to approximately the middle of the screened interval. Purging and sampling constituted one continuous sampling event, and there was no cessation of pumping prior to sample collection. The samples were transferred directly into the appropriate sample containers. The water was carefully poured down the inner walls of each sample bottle to minimize aeration of the sample. Groundwater sample GW-2 was analyzed in the laboratory for TPH-DRO using EPA Method 8015.

6.3.3 Sample Handling

The following describes the use and type of sample containers, preservation procedures, and glassware labeling and the sample shipment procedures taken during the course of this project.

6.3.3.1 Sample Containers, Preservation, and Labels

The analytical laboratory provided pre-preserved sample containers where appropriate. The sample containers were filled according to industry standards and the container lids were tightly closed. The sample labels were firmly attached to the container side, and the following information was legibly and indelibly written on the labels:

- Facility name
- Sample identification
- Sample type (i.e., soil, groundwater)
- Sampling date
- Sampling time
- Preservatives added
- Sample collector's initials.

6.3.3.2 Sample Shipment

After the samples were sealed and labeled, they were packaged for transport to Maryland Spectral Services, Inc. The following packaging and labeling procedures were followed:

- Samples were packaged to prevent leakage or vaporization from the containers
- Samples were cushioned to avoid breakage
- Ice was added to the cooler to keep the samples cool.

The packaged samples were hand delivered by to Maryland Spectral Services, Inc. under strict chain-of-custody procedures.

7.0 LIMITED SUBSURFACE INVESTIGATION RESULTS

7.1 Local Subsurface Conditions

An ATC Field Geologist visually inspected each four-foot soil column generated during advancement of the four borings. A boring log was completed for each boring location and subsurface conditions and soil type were noted for classification purposes. The completed boring logs provide a partial profile of subsurface conditions in the general vicinity of the on-site UST. In order to avoid accidental puncturing of the UST, all of the borings were located at least three feet from the estimated location of the UST.

Based on the results of the field analysis, ATC has determined that the soil in the general vicinity of the on-site UST consists of tight, low-permeability, reddish-brown to red colored clay. This layer of low-permeability clay extends from a depth of approximately 1 foot bgs to the boring completion depths ranging from 16 feet bgs to 20 feet bgs. The exception to this was the layer of reddish-tan, coarse sand encountered at boring B-2 extending from a depth of approximately 1 foot bgs to 4 feet bgs. The layer of coarse sand was located directly above the layer of clay and may be indicative of fill material. A perched groundwater zone was encountered at approximately 4 feet bgs at boring B-2 and groundwater sample GW-2 was collected from this location. ATC encountered Geoprobe refusal at depths ranging from 16 feet bgs at boring B-4 to 20 feet bgs at boring B-1. Due to probe refusal prior to reaching the groundwater table, ATC was unable to collect groundwater samples from borings B-1, B-3, and B-4.

ATC screened each four-foot soil column with a PID for the presence of VOCs. According to the field screening, VOC concentrations ranged from 0.0 parts per million (ppm) in the majority of the soil columns (all borings) to 16.0 ppm at a depth of 11.5 feet bgs at boring B-1.

7.1.1 Soil Analytical Data

Soil samples SS-1B through SS-4 were analyzed for TPH-DRO using EPA Method 8015. The results of the analysis indicated that all four soil samples contained concentrations of TPH-DRO below the laboratory detection limit of 1.0 ppm. Table 2 summarizes the analytical results for the TPH-DRO concentrations detected in the soil samples.

Table 2 - TPH-DRO Analysis for Soil Samples
Old Receiving Home for Wayward Boys
Samples Collected on 1/12/00

Sample Location	Sample Depth (feet bgs)	Concentration (mg/kg) TPH-DRO
SS-1B	11.5	bdl
SS-2	12.5	bdl
SS-3	12.5	bdl
SS-4	12.5	bdl

Note: mg/kg - milligrams per kilogram (parts per million)
bdl - below detection limits

7.1.2 Groundwater Analytical Data

Groundwater sample GW-2 was analyzed for TPH-DRO using EPA Method 8015. According to the results of the analysis, the TPH-DRO concentration in the groundwater sample was 0.24 mg/l. Table 3 summarizes the analytical results for the TPH-DRO concentrations detected in the groundwater sample.

Table 3 - TPH-DRO Analysis for Groundwater Sample
Old Receiving Home for Wayward Boys
Samples Collected on 1/12/00

Sample Location	Sample Depth (feet bgs)	Concentration (mg/L) TPH-DRO
GW-2	4.0	0.24

Note: mg/L - milligrams per liter (parts per million)

8.0 LIMITED SUBSURFACE INVESTIGATION CONCLUSIONS

On January 12, 2000, ATC conducted a Limited Subsurface Investigation at the Old Receiving Home for Wayward Boys, located in Northeast Washington, D.C. The Site Location Map, Figure 1 in Appendix D, illustrates the location of the subject site. The intent of this project was to provide subsurface investigation data for the site.

The soil and groundwater sampling program was designed in order to determine if the soil and groundwater in the general vicinity of the on-site UST has been impacted by petroleum products contained in the UST. The four locations of the Geoprobe borings were chosen by ATC from which to collect four soil samples and one groundwater sample.

The DCDOH-EHA-UST DIVISION designates an action limit of 100 mg/kg TPH-DRO concentration in soil. Based on the field screening and laboratory analysis performed on the on-site subsurface soil, ATC has concluded that the soil in the vicinity of the boring locations has not been impacted by petroleum. Based on the presence of the low-permeability clay surrounding the UST, ATC has concluded that if a release from the UST has occurred, the extent of the petroleum impacted soil would be limited to the immediate vicinity of the UST.

Due to probe refusal prior to reaching the groundwater table, ATC was unable to collect groundwater samples from borings B-1, B-3, and B-4. Groundwater sample GW-2 was collected from the perched water table encountered at boring B-2. According to the laboratory analysis, sample GW-2 exhibited a TPH-DRO concentration of 0.24 mg/l. The DCDOH-EHA-UST DIVISION designates an action limit of 1.0 mg/L TPH-DRO concentration in groundwater. Based on the results of the groundwater sample analysis, and based on the absence of petroleum impacted soil at the site, ATC has concluded that the shallow groundwater in the vicinity of the on-site has not been impacted by petroleum.

9.0 RECOMMENDATIONS

Based upon the scope of work conducted for ATC's Supplemental Environmental Services, ATC concludes and recommends the following:

A. All materials identified as ACMs should be removed and disposed of properly prior to scheduled demolition/renovation activities, which may impact the materials. The removal should be conducted by a licensed asbestos abatement contractor in accordance with all applicable federal, state and local regulations.

B. LBP and other materials which have been found to contain lead should be handled in accordance with the requirements of the OSHA Lead Exposure in Construction Standard (29 CFR 1926.62) and any other local requirements.

C. Demolition debris resulting from LBP and lead-containing material removal must be disposed of according to EPA Resource Conservation and Recovery Act requirements. RCRA requires that representative material samples from the waste stream be subjected to TCLP analysis. Resulting waste debris found to contain lead in concentrations greater than 5.0 ppm must be treated as hazardous waste.

D. All non-PCB ballasts manufactured after 1978 are required to be labeled as non-PCB. Any ballast not specifically labeled as "No PCBs" or "Non-PCB" should be assumed to be PCB containing. Removal and disposal of all PCB-containing equipment must be in accordance with federal and local regulations.

Based on the results of the Limited Subsurface Investigation performed at the site, ATC recommends that the on-site 5,000-gallon UST be emptied of any remaining fluids and the UST be excavated and removed from the site according to DCDOH-EHA-UST Division regulations.

Based on ATC's conclusions regarding the on-site soil and groundwater in the vicinity of the UST, ATC recommends no further action at the site in regards to petroleum-impacted soil and/or groundwater.

APPENDIX 2

CORRESPONDENCE FROM DEPT. OF THE INTERIOR

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401

October 23, 2000

Ms. Karen Voglezon
President
Voglezon Consulting, Inc.
900 Sero Estates Drive
Ft. Washington, Maryland 20744

RE: Receiving Home for Children
1000 Mount Olivet Road, NE
Washington, District of Columbia

Dear Ms. Voglezon:

This responds to your October 11, 2000, request for information on the presence of species which are federally listed or proposed for listing as endangered or threatened in the above referenced project area. We have reviewed the information you enclosed and are providing comments in accordance with Section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Except for occasional transient individuals, no proposed or federally listed endangered or threatened species are known to exist within the project impact area. Therefore, no Biological Assessment or further Section 7 consultation with the U.S. Fish and Wildlife Service is required. Should project plans change, or should additional information on the distribution of listed or proposed species become available, this determination may be reconsidered.

This response relates only to federally protected threatened or endangered species under our jurisdiction. Limited information is currently available regarding the distribution of other rare species in the District of Columbia. However, the Nature Conservancy and National Park Service (NPS) have initiated an inventory of rare species within the District. For further information on such rare species, you should contact Ellen Gray of the DC Natural Heritage Program at (202) 342-1443 ext. 223.

An additional concern of the Service is wetlands protection. Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the Basin's remaining wetlands, and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. Because of this policy and the functions and values wetlands perform, the Service recommends avoiding wetland impacts. All wetlands within the project area should be

identified, and if alterations of wetlands proposed, the U.S. Army Corps of Engineers, Baltimore District, should be contacted for permit requirements. They can be reached at (410) 962-3670.

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interests in these resources. If you have any questions or need further assistance, please contact Andy Moser at (410) 573-4537.

Sincerely,

Robert J. Pennington
Assistant Field Supervisor
Chesapeake Bay Field Office