

**Revised Draft Environmental Assessment (EA)  
For the Proposed Expansion of the Army National Guard  
Readiness Center (ARNGRC), Arlington, Virginia**

Prepared for

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## **EXECUTIVE SUMMARY**

Pursuant to the National Environmental Protection Act (NEPA) of 1969, as amended, the Army has prepared this Environmental Assessment (EA) to address the potential environmental and socioeconomic impacts of an action currently before the decisionmaker. The action involves the expansion of the existing Army National Guard Readiness Center (ARNGRC), parking facilities, and other supporting facilities to accommodate the 1200 personnel who will be vacating government-leased space in accordance with the Base Realignment Enclosure (BRAC) recommendations. The Proposed Action would enable ARNG to fulfill its military mission by providing a facility at the ARNGRC to meet antiterrorism force protection (AT/FP) standards as prescribed in Unified Facilities Criteria (UFC) 04-010-01, the Department of Defense (DoD) minimum antiterrorism standards for buildings. This EA analyzes the potential environmental effects of the Proposed Action and No-Action alternative. The potential cumulative effects of this project, in combination with the other actions outside of the ARNGRC site, are also evaluated.

## **PROPOSED ACTION**

The Proposed Action is to expand the existing ARNGRC, parking facilities, and other supporting facilities to accommodate approximately 1200 personnel who will be vacating government-leased space in accordance with BRAC recommendations. Elements of the Proposed Action are as follows:

- Construct an approximately 250,000-square-foot (SF), multi-story ARNGRC building addition adjacent to the existing building with heating, ventilation, and air conditioning. The lower levels of the addition, or plaza, would be constructed underground, reducing the footprint of the building addition while adhering to design constraints related to security setbacks on the installation. Construction would need to be completed by 2011 to meet BRAC requirements.
- Construct a multi-level employee parking garage east of the existing East Parking Garage (hereafter referred to as the NE Garage). Under the Proposed Action, access to the NE

Garage would be via the existing East Garage entrance along the Arlington Blvd. service road. Alterations in traffic flow patterns and signalization that would require approval from the County are recommended to mitigate traffic impacts under this alternative. Because of current funding restraints, the ARNG expects to complete the building expansion phase of this proposal before the implementation of the parking garage phase. The ARNG is currently working to obtain additional funding to build the garage by 2011; however, construction of the garage is scheduled to begin in 2014.

- Supporting facilities include physical security, outside lighting, and below ground stormwater retention tanks. A number of anti-terrorism force protection measures would be incorporated into the design. Sustainable principles would also be integrated into the design of all facilities. The scope of this project also includes the site demolitions needed to accommodate the new facilities.

A full range of transportation options to address traffic concerns associated with the realigned personnel and new parking structure have been evaluated in the ARNG's Traffic Management Plan (TMP) per the requirements of the National Capital Planning Commission (NCPC). The ARNG has also prepared a Traffic Impact Analysis (TIA).

## **NO-ACTION ALTERNATIVE**

Analysis of the No-Action alternative is prescribed by CEQ regulations and serves as the benchmark against which the environmental and socioeconomic effects of the Proposed Action and other reasonable alternatives can be evaluated. Under the No-Action alternative, realigned personnel would not be moved to the ARNGRC and the building addition and multi-level employee parking garage would not be built. The BRAC Commission instructed the National Guard Bureau (NGB) to move Jefferson Plaza 1 (JP-1) personnel from Crystal City, Arlington, Virginia, to the ARNGRC or Andrews Air Force Base (AFB). The BRAC Commission's mandate could be met without expansion of the ARNGRC, but would require sending the most of JP-1 personnel to Andrews AFB, but land acquisition inquiries at Andrews AFB were denied

by the Air Force. Leasing commercial space is contrary to the BRAC recommendations to increase overall efficiency and reduce operating costs through consolidation.

## **ALTERNATIVES ELIMINATED FROM DETAILED STUDY**

The ARNG evaluated alternatives to meet the purpose of and the need for the action (i.e., expanding the existing ARNGRC to fulfill the BRAC Commission's recommendation to realign JP-1 personnel, and constructing an employee parking garage and supporting facilities).

Screening criteria used to evaluate the feasibility of the alternatives include the following:

- Compliance with BRAC recommendations to realign the NGB HQ, the ANG HQ, and elements of the ARNGRC HQ to the ARNGRC, Arlington, VA, and Andrews AFB, MD.
- Availability of suitable facilities and/or land to meet the specified requirements for placement of personnel out of harm's way, as AT/FP measures at commercial facilities cannot be guaranteed.
- Ability to locate the addition and employee parking garage(s) on the same lot or adjacent lot.
- Environmental constraints of cumulative impacts associated with new homes adjacent to the ARNGRC, proposed new road construction, proposed State Department construction, and a new lease at JP-1, including the costs of potential environmental restoration and compliance.
- Economic considerations including construction and land acquisition cost.

Other relocation options to meet the BRAC recommendations to realign JP-1 personnel included land acquisition near the Pentagon, and at Andrews AFB. Land acquisition near the Pentagon was not selected because of insufficient funding and time constraints. Land acquisition inquiries at Andrews AFB were denied by the Air Force.

The available buildable site for this project is very limited as a result of the AT/FP restrictions, and the only feasible site for the expansion of the ARNGRC facility is at the south

end of the existing building. The following four alternative locations for the additional parking structure were initially considered:

- 1) A parking garage on the South side of the property adjacent to the new building addition
- 2) A parking garage on the adjacent Masonic Lodge parking lot and the existing ARNG visitor lot
- 3) A parking garage on the South side of the ARNG property and adjacent State Department property, which is the location of the George P. Schultz National Foreign Affairs Training Center (NFATC)
- 4) A parking garage on the lot across from the ARNGRC on the West side of S. George Mason Drive referred to as the “West parcel”.

## **ENVIRONMENTAL CONSEQUENCES**

Potential environmental impacts associated with implementing the Proposed Action and No-Action alternative are summarized in Table ES-1. The Proposed Action and No-Action alternative are not expected to result in significantly adverse individual or cumulative impacts to resources as a result of expanding the existing ARNGRC, parking facilities, and other supporting facilities

The No-Action alternative, as described under baseline conditions, would not meet the purpose of and need for providing adequate space for the 1200 personnel that will vacate government-leased space in Jefferson Plaza 1 (Crystal City, Arlington, VA) and relocate to the Army National Guard Readiness Center (ARNGRC) in Arlington, VA, as part of the co-location of National Guard Headquarters leased locations recommended by the 2005 Defense Base Realignment and Closure (BRAC) Commission. The Proposed Action would help meet this need.

The Proposed Action is not expected to result in significant adverse impacts to the environment with the proposed mitigation. Special consideration for minimizing impacts has been given to air quality, soils, noise, water resources, traffic, and cultural resources. Traffic and parking will be managed under a TMP to minimize impacts to the surrounding area.

Table ES-1. Comparison of Effects of the Proposed Action and No-Action alternative

Resource	Proposed Action	No-Action alternative
Land Use	<p>The Proposed Action will not have significant impacts on regional land use and zoning. The proposed construction would be compatible with regional development strategies. The County may allow a higher building height for the proposed building addition if the building incorporates a LEED Silver certified green building design.</p> <p>The most significant changes in future land use within the installation is the loss of most of the mature tree area for construction of the parking garage. It would have a long-term (permanent), minor adverse environmental affect on the land use of the site, but would not significantly affect vegetation resources in the area. A Memorandum of Understanding (MOU) exists between the State Department and Department of the Army concerning development of the north eastern corner of the site, which is the proposed location of the new parking garage (Appendix A-2). The MOU requires that coordination with the State Department be done by ARNG before construction can occur on this site. The ARNG initiated coordination with the State Department concerning the Proposed Action, but the State Department declined to meet to discuss the matter.</p>	<p>Under the No-Action alternative, conditions would remain unchanged. Neither regional land use nor installation land use would be affected.</p>
Air Quality	<p>The primary sources of air emissions from the Proposed Action are expected to be (1) construction vehicle fuel combustion, (2) earth moving activities (fugitive dust), (3) boiler fuel combustion, (4) emergency engine combustion, and (5) commuter vehicle fuel combustion. Air pollutant emissions of volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are of particular importance because they contribute to the formation of ozone and the ARNGRC is located in the Washington, DC-MD-VA moderate ozone nonattainment area. Furthermore, VOC, NO<sub>x</sub>, and sulfur dioxide (SO<sub>2</sub>) emissions also contribute to the formation of particulate matter &lt; 2.5 µm in diameter (PM<sub>2.5</sub>) emissions and the area is classified as nonattainment for PM<sub>2.5</sub>.</p> <p>Construction activities generate short-term, temporary emissions that result in generally localized impacts on air quality. Such temporary emissions include exhaust emissions from heavy-duty construction equipment/vehicles. Various types of construction equipment could be used at the ARNGRC for grading, digging, hauling, etc. Short-term, temporary emissions also include fugitive dust (particulate matter) emissions generated by construction and demolition equipment activities. The specific sources of fugitive dust emissions associated with construction are earth-moving and dirt pile/loose soil wind erosion. Dust control measures would be used where feasible. During construction, fugitive dust will be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution.</p> <p>Operation-related emissions from new boilers, new emergency generators, and additional commuter traffic will increase the pollutants, NO<sub>x</sub>, VOC, SO<sub>2</sub>, and PM<sub>2.5</sub>, which contribute to the ozone and PM<sub>2.5</sub> nonattainment status in the region; however, these emissions are low. The new addition will be a LEED certified green building design including energy conservation measures.</p> <p>Regional growth and attendant increased traffic volumes unrelated to the Proposed Action may produce additional NO<sub>x</sub> emissions and continue to aggravate the air quality situation in the area. Given that the contribution of the</p>	<p>Under the No-Action alternative, conditions would remain unchanged. The ARNGRC is located in the Washington, DC-MD-VA-WA MSA for moderate nonattainment area for ozone and PM<sub>2.5</sub>.</p>

Table ES-1. Comparison of Effects of the Proposed Action and No-Action alternative

Resource	Proposed Action	No-Action alternative
	<p>ARNGRC would be small relative to the regional problem, it is reasonable to proceed with the action while undertaking mitigation measures at the installation to reduce its contribution to the larger air quality issue. Mitigation includes the implementation of the TMP for the installation to encourage employees to utilize public transportation, thereby reducing commuter vehicle fuel combustion.</p> <p>The <i>de minimis</i> levels for a moderate ozone nonattainment area are 100 tpy for NO<sub>x</sub> and 50 tpy for VOC, and the <i>de minimis</i> levels for the PM<sub>2.5</sub> nonattainment area are 100 tpy for NO<sub>x</sub>, 50 tpy for VOC, 100 tpy for PM<sub>2.5</sub>, and 100 tpy for SO<sub>2</sub>. The total emissions associated with the Proposed Action for VOC, NO<sub>x</sub>, SO<sub>2</sub>, and PM<sub>2.5</sub> are less than the <i>de minimis</i> levels as shown in the Record of Non-Applicability (RONA) in Appendix E, which must be developed for actions exempt from the General Conformity rule (DOA 1995)</p>	
Noise	<p>Construction activities (i.e., operation of earthmoving and other construction equipment) associated with the Proposed Action would temporarily increase noise levels. Several steps can be taken to minimize the additional noise impacts contributed by the Proposed Action. Periods of construction could be limited to selected daylight hours. Noise attenuation measures could be used in building design and construction. Temporary barriers against construction noise and muffling of construction equipment could also be employed. No significant long-term noise impacts are anticipated from the Proposed Action.</p>	<p>Under the No-Action alternative, conditions would remain unchanged. No impacts from noise are associated with the No-Action alternative.</p>
Geology and Soils	<p>Based on site assessments, project construction under the Proposed Action need only follow appropriate construction procedures for the proposed design, in accordance with state and local regulations, to ensure that there would be no impacts to site geology. ARNG has coordinated with the Virginia DEQ regulators to determine the appropriate course of action for the removal of the petroleum contaminated soil at the site with consideration of the planned construction project. The building design will take advantage of the soil removal by incorporating two floors below grade. By building below grade, the need for areas to be hardened to meet force protection requirements will be reduced. No significant impacts to soils are anticipated under the Proposed Action.</p>	<p>Under the No-Action alternative, conditions would remain unchanged. Geology and soils on site would not be affected. NGB has met all appropriate actions with regards to the remediation of petroleum based contamination and levels, if any, pose no risk of human health and the environment (see Appendix A-1 for VDEQ letter dated 4 DEC 2007).</p>
Prime and Unique Farmland	<p>Soil on the ARNGRC site is not considered prime farmland. No significant impacts to prime and unique farmland are anticipated under the Proposed Action.</p>	<p>Under the No-Action alternative, conditions would remain unchanged. Prime and unique farmland would not be affected.</p>
Water Resources	<p>No significant adverse impacts to surface water are anticipated under the Proposed Action. Stormwater drainage on the site flows to drainage inlets for the Arlington County stormwater system via a stormwater retention pond located on site. The Proposed Action would require the removal of the stormwater retention pond. The County's Watershed Management Plan recommends minimizing increases in both flow rate and volume of stormwater runoff. The new building design will include underground cisterns for collecting stormwater on site.</p> <p>Erosion and sediment control measures that meet current Virginia regulations will be utilized to minimize impacts during construction under the Proposed Action. Standards and specifications under the Department of Conservation and Recreation's Virginia Erosion and Sediment Control Handbook (1992, 3rd edition), as well as the DCR's Virginia Stormwater Management Manual (1999), will be followed for any land grading. Best Management Practices</p>	<p>Under the No-Action alternative, conditions would remain unchanged. NGB has met all requirements with regards to remediation of petroleum based contamination, so that contaminant levels, if any, pose no risk of human health and the environment (see Appendix A-1 for VDEQ letter dated 4 DEC 2007).</p>

Table ES-1. Comparison of Effects of the Proposed Action and No-Action alternative

Resource	Proposed Action	No-Action alternative
	<p>(BMPs), as cited by these sources, and under Section 62.1-44.15(3A)-9VAC25-260-30, State Antidegradation Policy, will be used to avoid excessive runoff. Erosion and sediment controls during the construction period will be properly maintained. Controls will be in place prior to clearing and grading, and remain in place until the area is stabilized.</p> <p>High water table areas would be avoided. The building design will incorporate two floors below grade. A recent geotechnical assessment of the site found groundwater at depths ranging from approximately 15 to 21 feet, but no groundwater contamination was found at the site. No significant impact to groundwater is anticipated under the Proposed Action.</p>	
Wild and Scenic Rivers	<p>There are no Federal wild and scenic rivers in the state of Virginia or otherwise in the vicinity of the installation. Since no wild and scenic rivers exist in Virginia, no impacts to wild and scenic rivers are expected under the Proposed Action.</p>	<p>There are no Federal wild and scenic rivers in the state of Virginia. Under the No-Action alternative conditions would remain unchanged. Wild and scenic rivers would not be affected.</p>
Wetlands	<p>The USACE, Norfolk Division, completed a jurisdictional determination of the site in November of 2006 and confirmed that there are no wetlands located on the ARNGRC property (see Appendix A for agency correspondence). No impacts to wetlands are expected under the Proposed Action.</p>	<p>Under the No-Action alternative, conditions would remain unchanged. No wetlands are located on the ARNGRC property and none in the vicinity would be affected.</p>
Vegetation	<p>There are no unique or rare habitats in the ARNGRC site. Implementation of the Proposed Action would result in the removal of the majority of the mature tree area remaining on site. This area provides habitat for wildlife and a natural visual barrier that screens the northern boundary of the site from US 50 and the adjacent State Department property. There is also a MOU between the State Department and Department of the Army concerning development of the north eastern corner of the site. The MOU requires that coordination with the State Department be done by ARNG before construction can occur on this site. ARNG initiated coordination with the State Department concerning the Proposed Action, but the State Department declined to meet to discuss the matter.</p> <p>The loss of most of the mature tree area for construction of the parking garage would have a long-term (permanent), minor adverse environmental affect on the vegetation of the site, but would not significantly affect vegetation resources in the area.</p> <p>Compliance with the Chesapeake Bay Preservation Ordinance requires a plan of development for projects in Arlington County that propose to disturb more than 2,500 square feet of land. The components of the plan of development include a resource protection area (RPA) delineation, a Landscape Conservation Plan, a Stormwater Management Plan, and an Erosion and Sediment Control Plan. Based on the maps provided on the County's website, no RPAs appear on the ARNGRC site.</p> <p>In accordance with § 61-13.C, a Landscape Conservation Plan must be submitted and approved before any demolition or clearing and grading may occur on a lot or parcel, and must be prepared and/or certified by a landscape architect or arborist. The project will comply with all appropriate BMPs during construction, as regulated by the Virginia DEQ and Arlington County.</p>	<p>Under the No-Action alternative conditions, would remain unchanged. Existing vegetation on the ARNGRC property would not be affected.</p>

Table ES-1. Comparison of Effects of the Proposed Action and No-Action alternative

Resource	Proposed Action	No-Action alternative
Wildlife	The wildlife species found on the installation are typical of those found in most urban-suburban areas. The loss of open space, particularly the mature trees in the north east corner of the installation would disturb and displace wildlife. No significant long-term impacts to wildlife are anticipated under the Proposed Action.	Under the No-Action alternative, conditions would remain unchanged. Wildlife resources would not be affected.
Threatened and Endangered Species	There are no anticipated impacts to threatened and endangered species under the Proposed Action. Given the location of the ARNGRC in a highly developed urban area, and the limited amount of mature vegetation remaining on site, it is highly unlikely that any federally listed species are currently present on the ARNGRC site. Virginia Department of Conservation and Recreation, Division on Natural Heritage (DHR), has been contacted regarding the presence of threatened and endangered species in the vicinity of the installation. They do not anticipate that the Proposed Action would adversely affect any natural heritage resources that are in the vicinity of the project area.	Under the No-Action alternative conditions would remain unchanged. Threatened and endangered species would not be affected.
Cultural Resources	<p>No significant impacts to cultural resources on the installation are expected under the Proposed Action. Based on prior coordination with Arlington County's historical representative concerning the construction of the existing ARNGRC and the adjacent NFATC facilities, no known significant archaeological sites are located on or in the vicinity of the project area. If potential sites are uncovered in previously undeveloped areas during the construction phase of the Proposed Action, ARNGRC work would be halted pending consultation with the SHPO, and the NGB Cultural Resources Manager would be contacted for further direction. In accordance with the DoD American Indian Annotated Policy dated 27 Oct 99, the ARNG has determined there are no federally-recognized tribes may have an interest in this project. The ARNG contacted the VAARNG to determine if any federally recognized tribes had ancestral, religious, or cultural ties to the lands. It was determined no tribes had any ties to this land.</p> <p>No adverse impact to the Arlington Hall Station Historic District on the State Department NFATC property on the eastern side of the ARNGRC property are expected as a result of the Proposed Action. There is a considerable amount of modern construction currently visible from the historic district. The proposed building and parking garage would blend with the style and character of the existing facility to minimize an adverse effect on the historic district's viewshed.</p> <p>Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by ACHP. Revised regulations, "Protection of Historic Properties" (36 CFR Part 800), became effective January 11, 2001. The ARNG has concluded the Section 106 consultation with the Virginia Department of Historic Resources (VA SHPO) concerning the Proposed Action. The state agency concurred in ARNG's determination of No Adverse Effects on historic properties on December 27, 2007 (see Appendix A-1 for agency correspondence).</p>	No significant impacts to cultural resources on the installation are expected under the No-Action alternative given that no ground disturbance would occur.
Socioeconomics	There would be no change in the local population during the construction phase of the project, since no construction workers would likely relocate into the Region of Influence	Under the No-Action alternative, conditions would remain unchanged. The local economy in the vicinity of the ARNGRC would not be affected.

Table ES-1. Comparison of Effects of the Proposed Action and No-Action alternative

Resource	Proposed Action	No-Action alternative
	<p>(ROI). There are enough construction workers residing in the Washington, DC, and Baltimore metropolitan areas within easy daily commuting distance to Arlington to meet the construction labor demands of the Proposed Action. The cumulative demographic impacts of Proposed Action would be minimal, since workers being transferred within the ROI are less than five miles from their current location. The net job changes in military, civilian, and contractor personnel in the area's employment under BRAC is estimated to be less than -0.2%. The cumulative economic impacts of the Proposed Action are not expected to be significant.</p>	
<p>Environmental Justice</p>	<p>No disproportionately high and adverse impacts upon minority populations and low-income populations or children are expected from the Proposed Action. The proposed construction area is well away from concentrations of minority or low-income residents, either on or off the installation. Construction activities would not have disproportionate, adverse environmental or human health impacts on either minority or low-income populations, or safety impacts on children. While it is assumed that 1200 relocated jobs would be held by the transferred workers, a proportionate or greater number of indirect and induced jobs created in the ROI would potentially be available to minority and low-income residents. Completion of the Proposed Action would have no adverse impacts on environmental justice.</p>	<p>Under the No-Action alternative, conditions would remain unchanged, and would have no adverse impacts on environmental justice.</p>
<p>Infrastructure</p>	<p>The effect of the Proposed Action on utilities would be temporary and limited to construction activities, and are not expected to be significant. The sewer and stormwater pipes for the existing facility will have to be relocated to accommodate the new building addition under the Proposed Action. Actions will be taken to minimize any impacts on operations at the ARNGRC as a result of the relocation. Stormwater drainage on the site flows to drainage inlets for the Arlington County stormwater system via a stormwater retention pond located on site. The Proposed Action would require the removal of the stormwater retention pond. The County's Watershed Management Plan recommends minimizing increases in both flow rate and volume of stormwater runoff. The new building design will include underground cisterns for collecting stormwater on site. No significant adverse impacts on surface waters are anticipated under the Proposed Action.</p>	<p>Under the No-Action alternative, conditions would remain unchanged, and would have no adverse impacts on infrastructure.</p>
<p>Traffic</p>	<p>The relocation of approximately 1200 personnel from their current facility in JP-1 in Crystal City to the ARNGRC in Arlington will intensify traffic in the area (assuming use of the garage). In the TIA (see Appendix F), alterations in traffic flow patterns and signalization are recommended to mitigate traffic impacts. The TIA is conservative in the sense that it does not account for potential trip reductions that would be realized with the full implementation of the TMP (see Appendix G). If the ARNGRC meets all of the proposed 2010 Modal Split Goals outlined in the TMP (i.e., 47% of employees utilizing public transportation, 9% telecommuting, and another 4% using other forms of transportation), the site would have little or no impact to the surrounding area even with the garage. The construction of the NE garage combined with the implementation of the TMP would be a significant improvement to the existing parking situation. Providing additional on-site parking, increasing the public transportation use, and reducing the number of SOV trips to the site would alleviate the impact of off-site parking in neighboring residential areas.</p>	<p>Under the No-Action alternative, traffic and parking issues would remain unchanged in the vicinity of the ARNGRC site. No improvements would be made to address the existing parking situation.</p>

Table ES-1. Comparison of Effects of the Proposed Action and No-Action alternative

Resource	Proposed Action	No-Action alternative
	<p>The ARNG is committed to fully implementing the TMP and associated TDM strategies to mitigate traffic impacts by the beginning of the BRAC initiative. It is important to recognize that the TMP is a dynamic document that could change over time as employees turn over and overall travel patterns change. Therefore, on-going monitoring will be necessary to ensure the success of the program.</p> <p>The TIA and traffic pattern mitigation recommendations will require approval from Arlington County. Assuming that the County approves the recommended traffic pattern changes outlined in the TIA, and the ARNG implements its TMP, no significant impacts from traffic are expected in the vicinity of the site. In addition, no significant impacts from parking in neighboring residential areas are expected as a result of the Proposed Action.</p>	
<p>Hazardous, Toxic, and Radioactive Substances</p>	<p>The ARNG has completed its coordination with Virginia DEQ regulators to determine the appropriate course of action for the removal of the petroleum contaminated soil at the site with consideration of the consideration of the planned construction project. The building design will take advantage of the soil removal by incorporating two floors below grade. By building below grade, the need for areas to be hardened to meet force protection requirements will be reduced. The source of contamination, the former fuel oil UST, has been removed.</p> <p>No impacts to surface soil or groundwater in the area of investigation were found. Detected VOC concentrations in subsurface soil and groundwater were less than risk-based screening levels, indicating no constituents of potential concern. In addition, there is no evidence of offsite migration associated with the release. Mitigation measures include excavating and disposing of petroleum contaminated soils at a permitted treatment, storage, or disposal facility. Persons involved with cleanup of impacted soils should be OSHA trained and use appropriate procedures and personal protective equipment to reduce their exposure to acceptable levels. The soil will be disposed of in accordance with applicable Federal, State, and local laws and regulations. The use of water to minimize or abate airborne dust should be carefully considered to minimize the spread of any contamination in soil. Excessive use of water could drive soil contaminants into the upper aquifer or spread it to non-contaminated areas. Plastic sheeting should be considered during this time to prevent potential release scenarios. Using tarps on loads and keeping tires clean will also minimize the spread of contamination.</p> <p>While the risk of uncovering an Unexploded Ordnance (UXO) at the ARNGRC site is low, the ARNG will follow the guidelines outlined in the U.S. Army Corps of Engineers (COE) pamphlet labeled "Unexploded Ordnance (UXO) Support during Hazardous, Toxic, and Radioactive Waste (HRTW) and Construction Activities, EP 75-1-2 dated November 20, 2000 in the case of an inadvertent discovery.</p> <p>No additional known hazardous, toxic, or radioactive substances are located at the project site, and no impacts related to these substances are anticipated under the Proposed Action.</p>	<p>Under the No-Action alternative, conditions would remain unchanged. No new hazardous, toxic, or radioactive substances would be added. The NGB has met all appropriate actions with regards to the remediation of petroleum based contamination and levels, if any, pose no risk of human health and the environment (see Appendix A-1 for VDEQ letter dated 4 DEC 2007).</p>