



FINAL
Environmental Compliance Due Diligence Activities Report

U.S. Coast Guard Palermo Housing Units
2, 4, 6, 8, 10, 12, 14, 16 and 18 Harriett Lane
Palermo, NJ 08230

Contract No. GS-00P-08-CY-A-0045/Award No. GS-P-00-13-CY-5054

April 2014



United States Coast Guard
U.S. Department of Homeland Security



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Prepared For:

**United States General Services Administration
Office of Real Property Utilization and Disposal
1800 F Street, NW
Washington, DC 20405**

Prepared By:

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April 2014

AMEC Project No: GSA1570023.0000

Date of Site Visit: August 29, 2013

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6.0 CONCLUSIONS AND RECOMMENDATIONS

AMEC has performed Environmental Compliance Due Diligence Activities which includes a limited ACM survey, Lead-Based Paint Inspection and Risk Assessment, Lead in Soil Sampling activities, and sensitive environmental area review including NEPA data gathering in conformance with the scope and limitations of the Guidance for the nine USCG housing units, located at 2, 4, 6, 8, 10, 12, 14, 16 and 18 Harriett Lane in Palermo, Cape May County, New Jersey. This Environmental Compliance Due Diligence Activities has revealed the following findings that relate to potential for contamination or liability in connection to the Site.

6.1 CONCLUSIONS

- Limited sampling of select building materials for asbestos analysis was completed at the Site. Asbestos was detected in some materials including brown floor tile/mastic under carpeting, green floor tiles/mastic under carpeting.
- The LBP inspection indicated that lead is present at or above the USEPA Housing and Urban Development (HUD) definition of LBP (at or above 1.0 mg/cm²) on tested coatings at the Site. LBP was identified on various doors components and exterior fascia.
- The soil sampling results around the exterior of the structures indicated that lead was not present in surface soils at concentrations in excess of the USEPA or the New Jersey Department of Environmental Protection (NJDEP) residential direct contact criteria.
- The sensitive areas review indicated that the site lies within a one mile radius of three archaeological sites and one architectural site.
- The sensitive areas review indicated that the site is situated approximately 2.5 miles west of the Atlantic Ocean shoreline. No wetlands or surface waters are known to occur within the site or immediately adjacent to the site. However, a significant number of wetlands are mapped within 900 feet east of the southernmost portion of the site.
- The sensitive areas review indicated that the site is located outside the regulated FEMA mapped 100-year floodplain¹ as well as the 100-year coastal floodplain². Based on estimates from current aerial coverage and the FIRM map (FEMA 1984), it appears that the project area falls entirely within Zone C (areas of minimal flooding), but immediately adjacent to Zone B (0.2% chance flood event). Given this floodplain mapping is rather old and digital data is not available, there is a potential for the southernmost housing unit to fall partially within the 500-year floodplain.
- No Recognized Environmental Conditions (RECs), as defined by ASTM Standard Practice E 1527-05, was identified in connection with the site. "Recognized Environmental Conditions" are "The presence or likely presence of any Hazardous Substances or Petroleum Products on a Property under conditions that indicate an

¹ Special flood hazard area subject to the 1% annual chance flood.

² Special high hazard area within coastal areas at risk for flooding during a 1% change storm surge.



existing release, a past release, or a material threat of a release of any Hazardous Substances or Petroleum Products into structures on the Property or into the ground, groundwater, or surface water of the Property. The term includes Hazardous Substances or Petroleum Products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.”

6.2 RECOMMENDATIONS

Based on the conclusions outlined above, AMEC has provided the following recommendations to the USCG for consideration with respect to the Site.

- Based on the intended use of the property, an Asbestos Management Plan should be developed to manage the suspect/presumed ACMs in-place. If the intended use of the property is changed in the future, abatement of the ACM by a certified asbestos abatement company may be warranted. In addition, if maintenance activities are performed that affect the potential ACM, the material should be handled accordingly by qualified individuals.

6.3 LIMITATIONS

The conclusions of the report are professional opinions based solely upon visual site observations, and interpretations of analyses as described in this report. The opinions presented within this report apply to the site conditions existing at the time of the investigations, and interpretation of current regulations. Therefore, opinions and recommendations provided within this report might not apply to future conditions that may exist at the Site.

The current regulations should always be verified prior to any work involving asbestos or other regulated materials. This survey is not intended to be used as an abatement design document. All existing conditions, quantities, and locations should be verified prior to abatement. ACM may be found within wall cavities, above ceilings, in pipe chases, within attics, or other inaccessible areas. The survey did not include an investigation of potentially buried piping within or in the vicinity of the structures.