

2019

Lake Pontchartrain and Vicinity GRR HTRW – Appendix H



U.S. Army Corps of Engineers,
New Orleans District

Non-Federal Sponsor: Coastal Protection
and Restoration Authority Board

11/22/2019

1 BACKGROUND

The USACE regulations (ER 1165-2-132 and ER 200-2-3), and District policy requires procedures be established to facilitate early identification and appropriate consideration of potential HTRW in reconnaissance, feasibility, preconstruction engineering and design, land acquisition, construction, operations and maintenance, repairs, replacement, and rehabilitation phases of water resources studies or projects by conducting HTRW Phase I Environmental Site Assessments (ESAs). USACE specifies that these assessments follow the process/standard practices for conducting Phase I ESAs published by the American Society for Testing and Materials (ASTM). This assessment was prepared using the following ASTM Standards:

- E1527-13: Standard Practice for Environmental Site Assessments – Phase I Environmental Site Assessment process
- E1528-06: Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (interview questionnaires)
- E2247-08 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property

The purpose of a Phase I ESA is to identify, to the extent feasible in the absence of sampling and analysis, the range of contaminants within the scope of the U.S. Environmental Protection Agency's (EPA) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products.

After the devastation of the 2005 hurricane season, the U.S. embarked on one of the largest civil works projects ever undertaken, at an estimated cost of \$14.6 billion, with restoration, accelerated construction, improvements, and enhancements of various risk reduction projects within southeastern Louisiana, including the Greater New Orleans Hurricane and Storm Damage Risk Reduction System (HSDRRS). When used herein the term HSDRRS is used to refer the LPV/WBV projects and other projects which contribute, as an incidental benefit, to providing the 1% LORR. The scope of this study will focus on the LPV project, and components of adjacent projects if applicable, necessary for LPV to provide coastal storm risk management. With the completion of the levees, floodwalls, gates, and pumps that together form the HSDRRS, 100-year level of hurricane and storm damage risk reduction was brought to the areas within LPV and WBV. At this time, Phase I ESAs were performed for the selected project features and Recognized Environmental Conditions (RECs) were identified and remediated or avoided prior to construction. Some RECs were identified in the Phase I ESAs within the Rights-of-Way (ROW) for the HSDRRS, on adjacent or adjoining properties, and outside, but near, the project areas. All of these RECs were easily remediated or avoided and were unlikely to affect the HSDRRS, personnel working on the project, or the public.

The authorization for the HSDRRS required it to provide the 1% level of risk reduction required for participation in the National Flood Insurance Program under the base flood elevations current at the time of construction. It did not authorize future levee lifts that will be required to sustain the 1% level of risk reduction over the long term. This Future Levee Lifts study was first authorized in the Water Resources Reform and Development Act 2014 Section 3017. As with HSDRRS, the LPV Future Levee Lifts Study will also require Phase I ESAs to be conducted on the selected project features. During the feasibility phase, an abridged Phase I ESA was performed to determine the potential for HTRW problems which could impact or be impacted by potential project features.

The abridged Phase I ESA included the following tasks: 1) the review of previous HTRW Phase I ESAs to identify previously recorded RECs that may have been found prior to the construction of the HSDRRS features, and 2) a

field survey to determine if new RECs are within the HSDRRS levee and floodwall ROW. A full Phase I ESA will be performed on the TSP during feasibility level design and the results will be included in the final report.

2 HAZARDOUS, TOXIC, AND RADIOACTIVE WASTE

An abridged Phase I ESA was conducted during the feasibility phase of this Future Levee Lifts study. This abridged Phase I ESA was conducted in the current HSDRRS levee and floodwall ROW and the results are presented directly below. The abridged Phase I ESA included the following tasks: 1) the review of previous HSDRSS HTRW Phase I ESAs to identify previously recorded RECs that may have been found prior to the construction of the HSDRRS features, and 2) a field survey to determine if new RECs are within the HSDRRS levee and floodwall ROW. A full Phase I ESA will be performed on the TSP during feasibility level design and the results will be included in the final report. The abridged Phase I ESA tasks and results are:

Task 1 Results:

According to the 2013 HSDRRS Comprehensive Environmental Document Phase I Volume I, RECs were avoided and the probability of encountering HTRW in the project area was low, no impacts from HTRW were anticipated. If a REC was not avoided, then the non-Federal sponsor was responsible for all costs of investigation, studies and investigations necessary to determine an appropriate response, and response of remediation determined to be necessary by the environmental regulator with jurisdiction. If construction revealed the existence of previously unknown HTRW, then work in that area stopped until the risk from HTRW was evaluated and an appropriate response was determined. After a thorough review of previous Phase I ESAs related to the original HSDRRS construction, only one REC was found within the LPV floodwall ROW. This was an abandoned drum filled with unknown material located on the canal side of the West Return Levee Floodwall (drum coordinates: 30°00'29.8" N, 90°16'45.9" W). The contractor MMC recommended the removal and disposal of all wastes and vehicles, and soil sampling near drums and vehicles to confirm no impact from spills/leaks. These actions would have been completed prior to any construction activities. Other than this one abandoned drum, the previous Phase I ESAs indicated that no RECS fell within the LPV levee or floodwall ROWs.

Task 2 Results:

CEMVN-PDC-CC personnel made a site visit to the LPV levee and floodwall ROWs on 03 April 2019, 04 April 2019, and 10 April 2019. The LPV levee and floodwall ROWs were inspected for the presence of pipes, containers, tanks or drums, ponds or lagoons, car bodies, tires, refrigerators, trash dumps, electrical equipment, oil drilling equipment, gas or oil wells, discoloration of vegetation or water sheens, discoloration of soils, out-of-place dirt mounds or depressions in the landscape, evidence of fire, stressed soils with lack of vegetation, discoloration of vegetation, animal remains, unusual animal behavior, biota indicative of a disturbed environment, and odors indicative of poor water quality or chemical presence. None of the aforementioned indicators were found during the site visits. Specifically, the REC location discovered under Task 1 above was visited on 03 April 2019, and the abandoned drum filled with unknown material was no longer present at the said location. As mentioned above, REC removal and/or remediation would have occurred prior to HSDRRS construction activities.

2.1 HAZARDOUS, TOXIC, AND RADIOACTIVE WASTE FUTURE CONDITIONS

The future without action condition describes what the future will look like if no future levee lifts are performed; this condition is used as the basis for comparison for every planned solution. Phase I ESAs were performed for the existing HSDRSS project features and RECs were identified and remediated or avoided prior to construction. Some RECs were identified in the Phase I ESAs within the ROW for the HSDRRS, on adjacent or adjoining properties, and outside, but near, the project areas. All of these RECs were easily remediated or avoided and were unlikely to affect the HSDRRS, personnel working on the project, or the public. The low probability of encountering RECs on

the existing HSDRSS project features will likely continue, and if RECS are found in the future, they will likely be easily remediated or avoided and will be unlikely to affect the existing HSDRRS features or the public.