

2021

West Bank & Vicinity GRR Appendix H – HTRW



**US Army Corps
of Engineers**
New Orleans District

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

Non-Federal Sponsor: Coastal Protection and
Restoration Authority Board of Louisiana

March 2021

THIS PAGE IS INTENTIONALLY BLANK

WEST BANK & VICINITY GRR APPENDIX H – HTRW

USACE regulations (ER 1165-2-132 and ER 200-2-3) require procedures be established to facilitate early identification and appropriate consideration of potential HTRW in 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 USEPA 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 and ecosystem restoration projects within southeastern Louisiana, including the WBV. With the completion of the levees, floodwalls, gates, and pumps that together form the LPV and WBV, 1% AEP 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 WBV, 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.

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. 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 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.

The abridged Phase I ESA tasks and results are:

Task 1 Results – According to the 2013 HSDRRS CED 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

remediation. 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, a dry and plugged oil well, was found within the WBV ROW at coordinates 29°48'31.7" N, -90°3'6.03" W. A 300-foot radius for a No-Excavation Zone around the dry and plugged well was proposed. Several potential RECs (petroleum product pipelines) were noted to be crossing the project footprint, and care was taken to prevent damaging the pipelines. Other than one dry and plugged oil well, the previous Phase I ESAs indicated that no RECS fell within the WBV levee or floodwall ROWs.

Task 2 Results – Study team personnel made a site visit to the WBV levee and floodwall ROWs on 09 April 2019. The MRL co-located portion of the study area was inspected on 17 October 2019. The WBV 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 09 April 2019, and the dry and plugged oil well was not located at the said coordinates. As mentioned above, the No-Excavation Zone was likely to have been enforced and care was taken near the pipelines during HSDRRS construction activities.

Historic Phase I ESAs have indicated that no RECs were found within the footprint of the WBV levee and floodwall systems as well as the portions of the MRL co-located levee and floodwall systems that were incorporated into the study.