

APPENDIX I

Screening Level Ecological Risk Assessment
(Tier I Exclusion Criteria Checklist)



TIER 1: Exclusion Criteria Checklist

PART I. Affected Property Identification and Background Information

- 1) Provide a description of the specific area of the response action and the nature of the release. Include estimated acreage of the affected property and the facility property, and a description of the type of facility and/or operation associated with the affected property. Also, describe the location of the affected property with respect to the facility property boundaries and public roadways.

The SGR is part of the former LAFB in Laredo, Webb County, Texas. The site is located approximately one-half mile west of the Laredo International Airport (LIA). The site is bounded by McPherson Road on the west, Hibiscus Avenue on the north, Daugherty Road on the east, and East Hillside Road on the south.

The land was formerly owned and operated by the U.S. Air Force as a gunnery training school during from 1942 to 1947. However, based on aerial photographs, two of the World War II skeet ranges along East Hillside Road appear to have been active during the reactivation of LAFB in 1952 and into the early 1960s. The site is now inactive. The former SGR land is a 52.1-acre site currently owned by multiple residential and commercial landowners. Each property has been identified as a Decision Unit (DU) and the affected property under current conditions is contained within DU 074 and DU 049 located along Greenway Lane, DU 010-04 and DU 010-06 located along Dogwood Ave, and DU 056 and DU 054 located along Wildrose Circle.

Attach available USGS topographic maps and/or aerial or other affected property photographs to this form to depict the affected property and surrounding area. Indicate attachments:

Topo map Aerial photo Other

- 2) Identify environmental media known or suspected to contain chemicals of concern (COCs) at the present time. Check all that apply:

<u>Known/Suspected COC Location</u>	<u>Based on sampling data?</u>	
<input checked="" type="checkbox"/> Soil # 5 ft below ground surface	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<input checked="" type="checkbox"/> Soil >5 ft below ground surface	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Groundwater	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Surface Water/Sediments	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Explain (previously submitted information may be referenced):

The following COCs have been identified at concentrations above residential assessments levels in surface soils: PAHs and lead. ISM samples reported a maximum benzo(a)pyrene concentration of 11.2 mg/kg in surface soil at DU 049. The maximum concentration of benzo(a)pyrene in discrete samples (110 mg/kg) was detected at DU 074 at a depth of 8 to 10 feet bgs. The maximum concentration detected in surface soil (0-2 ft bgs) is 55 mg/kg at DU 074. A discrete surface soil sample from DU 134 reported a lead concentration above the residential assessment level (594 mg/kg).

No COCs were identified for groundwater at the former SGR.

Figure: 30 TAC '350.77(b) continued

- 3) Provide the information below for the nearest surface water body which has become or has the potential to become impacted from migrating COCs via surface water runoff, air deposition, groundwater seepage, etc. Exclude wastewater treatment facilities and stormwater conveyances/impoundments authorized by permit. Also exclude conveyances, decorative ponds, and those portions of process facilities which are:
- a. Not in contact with surface waters in the State or other surface waters which are ultimately in contact with surface waters in the State; and
 - b. Not consistently or routinely utilized as valuable habitat for natural communities including birds, mammals, reptiles, etc.

The nearest surface water body is approximately 700 feet/miles from the affected property and is named Zacata Creek. The water body is best described as a:

- freshwater stream: perennial (has water all year)
 X intermittent (dries up completely for at least 1 week a year)
 intermittent with perennial pools
- freshwater swamp/marsh/wetland
- saltwater or brackish marsh/swamp/wetland
- reservoir, lake, or pond; approximate surface acres:
- drainage ditch
- tidal stream bay estuary
- other; specify

Is the water body listed as a State classified segment in Appendix C of the current Texas Surface Water Quality Standards; "307.1 - 307.10?

Yes Segment # _____ Use Classification:

No

If the water body is not a State classified segment, identify the first downstream classified segment.

Name: Rio Grande

Segment #: 2304 Rio Grande Below Amistad Reservoir

Use Classification: Contact Recreation, Public Water Supply, and High Aquatic Life Use

As necessary, provide further description of surface waters in the vicinity of the affected property:

There are no surface water bodies within the SGR site boundaries. The nearest waterbody to the site is Zacata Creek, located northwest of the on-site property. Zacata Creek is channelized, sometimes lined with concrete, and shown on United States Geological Survey (USGS) maps as an intermittent channel. The apparent use is storm water drainage. Zacata Creek flows south and eventually discharges to the Rio Grande south of Laredo. The only permanent surface water body near the site is Casa Blanca Lake, located approximately one mile east of Laredo International Airport, approximately 2.5 miles east of the SGR.

Figure: 30 TAC '350.77(b) continued

PART II. Exclusion Criteria and Supportive Information

Subpart A. Surface Water/Sediment Exposure

- 1) Regarding the affected property where a response action is being pursued under the TRRP, have COCs migrated and resulted in a release or imminent threat of release to either surface waters or to their associated sediments via surface water runoff, air deposition, groundwater seepage, etc.? Exclude wastewater treatment facilities and stormwater conveyances/impoundments authorized by permit. Also exclude conveyances, decorative ponds, and those portions of process facilities which are:
- a. Not in contact with surface waters in the State or other surface waters which are ultimately in contact with surface waters in the State; and
 - b. Not consistently or routinely utilized as valuable habitat for natural communities including birds, mammals, reptiles, etc.

Yes No

Explain:

The site consists of flat terrain covered with grass yards and residential houses. The flat terrain and vegetative cover of the site minimizes the movements of COCs from the affected property. The only surface water is present directly after a rain event. The minimal runoff from the site will enter the drainage ditches and storm sewers associated with the streets that run throughout the neighborhood. In addition, any surface water flowing west, which was not diverted by the residential streets, will enter the channelized Zacata Creek to the west. Due to anthropogenic activities and maintenance on this flood conveyance channel, Zacata Creek is not consistently or routinely utilized as valuable habitat for natural communities including birds, mammals, reptiles, etc.

If the answer is Yes to Subpart A above, the affected property does not meet the exclusion criteria. However, complete the remainder of Part II to determine if there is a complete and/or significant soil exposure pathway, then complete PART III - Qualitative Summary and Certification . If the answer is No, go to Subpart B.

Subpart B. Affected Property Setting

In answering “Yes” to the following question, it is understood that the affected property is not attractive to wildlife or livestock, including threatened or endangered species (i.e., the affected property does not serve as valuable habitat, foraging area, or refuge for ecological communities). (May require consultation with wildlife management agencies.)

- 1) Is the affected property wholly contained within contiguous land characterized by: pavement, buildings, landscaped area, functioning cap, roadways, equipment storage area, manufacturing or process area, other surface cover or structure, or otherwise disturbed ground?

Yes No

Figure: 30 TAC '350.77(b) continued

Explain:

The SGR was completely developed as a residential neighborhood in the late 1970s. The affected property is characterized by buildings, pavement and roadways, landscaped areas, and otherwise disturbed ground (as defined in the Guidance for Conducting Ecological Risk Assessments at Remediation Sites in Texas). The area is characterized by human presence and activities and any ecological habitat that may have once existed has been altered, impacted, or reduced to a degree such that it is no longer conducive to utilization by ecological receptors.

If the answer to Subpart B above is Yes, the affected property meets the exclusion criteria, assuming the answer to Subpart A was No. Skip Subparts C and D and complete PART III - Qualitative Summary and Certification. If the answer to Subpart B above is No, go to Subpart C.

Subpart C. Soil Exposure

- 1) Are COCs which are in the soil of the affected property solely below the first 5 feet beneath ground surface **or** does the affected property have a physical barrier present to prevent exposure of receptors to COCs in surface soil?

Yes

No

Explain:

If the answer to Subpart C above is Yes, the affected property meets the exclusion criteria, assuming the answer to Subpart A was No. Skip Subpart D and complete PART III - Qualitative Summary and Certification. If the answer to Subpart C above is No, proceed to Subpart D.

Subpart D. *De Minimus* Land Area

In answering "Yes" to the question below, it is understood that all of the following conditions apply:

- The affected property is not known to serve as habitat, foraging area, or refuge to threatened/endangered or otherwise protected species. (Will likely require consultation with wildlife management agencies.)
- Similar but unimpacted habitat exists within a half-mile radius.
- The affected property is not known to be located within one-quarter mile of sensitive environmental areas (e.g., rookeries, wildlife management areas, preserves). (Will likely require consultation with wildlife management agencies.)
- There is no reason to suspect that the COCs associated with the affected property will migrate such that the affected property will become larger than one acre.

Figure: 30 TAC '350.77(b) continued

- 1) Using human health protective concentration levels as a basis to determine the extent of the COCs, does the affected property consist of one acre or less and does it meet all of the conditions above?

Yes

No

Explain how conditions are met/not met:

If the answer to Subpart D above is Yes, then no further ecological evaluation is needed at this affected property, assuming the answer to Subpart A was No. Complete PART III - Qualitative Summary and Certification. If the answer to Subpart D above is No, proceed to Tier 2 or 3 or comparable ERA.

Figure: 30 TAC '350.77(b) continued

PART III. Qualitative Summary and Certification (Complete in all cases.)

Attach a brief statement (not to exceed 1 page) summarizing the information you have provided in this form. This summary should include sufficient information to verify that the affected property meets or does not meet the exclusion criteria. The person should make the initial decision regarding the need for further ecological evaluation (i.e., Tier 2 or 3) based upon the results of this checklist. After review, TNRCC will make a final determination on the need for further assessment. **Note that the person has the continuing obligation to re-enter the ERA process if changing circumstances result in the affected property not meeting the Tier 1 exclusion criteria.**

Completed by: Rebecca Heslep (Typed/Printed Name)
Ecological Risk Assessor (Title)
March 9, 2017 (Date)

I believe that the information submitted is true, accurate, and complete, to the best of my knowledge.

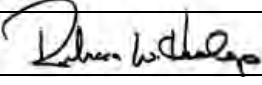
Rebecca Heslep (Typed/Printed Name of Person)
Senior Risk Assessor (Title of Person)
 (Signature of Person)
January 8, 2018 (Date Signed)

Figure: 30 TAC '350.77(b) continued

**Tier 1 Ecological Exclusion Criteria
Supporting Documentation**

The SGR is part of the former LAFB in Laredo, Texas. The land was formerly owned and operated by the U.S. Air Force as a gunnery training school during from 1942 to 1947. However, based on aerial photographs, two of the World War II skeet ranges along East Hillside Road appear to have been active during the reactivation of LAFB in 1952 and into the early 1960s. The site is now inactive. The former SGR land is a 52.1-acre site currently owned by multiple residential and commercial landowners.

The SGR was completely developed as a residential neighborhood in the late 1970s. The affected property is characterized by buildings, pavement and roadways, landscaped areas, and otherwise disturbed ground. The area is characterized by human presence and activities and any ecological habitat that may have once existed has been altered, impacted, or reduced to a degree such that it is no longer conducive to utilization by ecological receptors.

There are no surface water bodies within the SGR site boundaries. The nearest waterbody to the site is Zacata Creek, located northwest of the on-site property. Zacata Creek is intermittent, channelized, partially lined with concrete. Due to anthropogenic activities and maintenance on this flood conveyance channel, Zacata Creek is not consistently or routinely utilized as valuable habitat for natural communities including birds, mammals, reptiles, etc.

Given this information, the former SGR meets the Tier 1 Exclusion Criteria and further ecological evaluation is not warranted.