

Appendix E – HTRW

General Investigations Feasibility Study
Integrated Draft Feasibility Report and Environmental Impact Assessment

January 2020



**US Army Corps
of Engineers[®]**
Fort Worth District

(NOTE: This page intentionally left blank.)

Table of Contents

List of Figures	4
List of Tables	5
List of Acronyms	6
1 Background	1
1.1 Introduction.....	1
1.2 Records Review.....	1
1.3 Site Visit	4
1.4 Interviews	4
1.5 Conclusion of Background Records Review	5
2 Existing Conditions	2
2.1 General Description	2
3 Expected Future Without-Project Conditions	2
4 Future With-Project Conditions	3
5 *References	3
6 Attachment A – EDR Report	8

List of Figures

Figure 1: Map of River Road HTRW Sites

Figure 2: Map of River Road Well Sites

List of Tables

Table 1: Standard ASTM Search Distances and Records Review Results

List of Acronyms

AE	Architectural and Engineering
AFB	Alternative Formulation Briefing
ATR	Agency Technical Review
ATRT	Agency Technical Review Team
CAR	Corrective Action Request
CCIR	Commander's Critical Information Requirement
CE/ICA	Cost Effectiveness/Incremental Cost Analysis
Corps	U.S. Army Corps of Engineers
CMI	Corporate Management Information
CMP	Cost Management Plan
DQC	District Quality Control
DX	Directorate of Expertise
EC	Engineer Circular
EIS	Environmental Impact Statement
EM	Engineer Manual
ER	Engineer Regulation
ERDC	Engineer Research and Development Center
EVM	Earned Value Management
FCSA	Feasibility Cost Share Agreement
FGDC	Federal Geographic Data Committee
FRA	Flood Risk Assessment
FRM	Flood Risk Management
FWOP	Future without Project
FWS	Fish and Wildlife Service
FY	Fiscal Year
GDM	General Design Memorandum
GIS	Geographic Information Systems
HEC	Hydrologic Engineering Center
HEC-FDA	Hydrologic Engineering Center Flood Damage Assessment Model
HEC-FRM	Hydrologic Engineering Center Flood Risk Management Model
HEMP	Hydrologic Engineering Management Plan
H&H	Hydrology and Hydraulics
HQUSACE	Headquarters, U.S. Army Corps of Engineers
HTRW	Hazardous, Toxic and Radioactive Waste Program
IRC	Issue Resolution Conference
IEPR	Independent External Peer Review
IPR	In-Progress Review
IWR	Institute of Water Resources
LAERF	Lewisville Aquatic Ecosystem Research Facility
LERRD	Lands, Easement, Right-of-Way, Relocations, and borrow and dredged or Excavated materials Disposal areas
MIPR	Military Interdepartmental Purchase Request
MSC	Major Subordinate Command

MFR	Memorandum for Record
NED	National Economic Development
NEPA	Nation Environmental Protection Act
NER	National Ecosystem Restoration
NOA	Notice of Availability
NWP	Nationwide Permit
O&M	Operations and Maintenance
OMB	Office of Management and Budget
P2	Scheduling software database
PCX	Planning Center of Expertise
PDT	Project Delivery Team
PED	Pre Engineering and Design
PES	Project Executive Summary
PL	Lead Planner
PM	Project Manager
PMBP	Project Management Business Process
PMP	Project Management Plan
PROC	Process
QMS	Quality Management System
RIT	Regional Integration Team
RMO	Resource Management Office
SAWS	San Antonio Water System
SDSFIE	Set of data standards that define the content of the database
SMART	Specific, Measurable, Attainable, Risk Informed and Timely
SMT	Study Management Team
SWD	Southwest Division
SWF	Fort Worth District
TCEQ	Texas Commission on Environmental Quality
TPWD	Texas Parks and Wildlife Department
TSP	Tentative Selected Plan
TX SHPO	Texas State Historical Preservation Officer
USFWS	US Fish and Wildlife Services
VT	Vertical Team
WBS	Work Breakdown Structure
WIK	Work-In-Kind
WRDA	Water Resources Development Act

1 Background

1.1 Introduction

In order to complete a feasibility level HTRW evaluation for River Road, a report was completed following the rules and guidance of ER 1165-2-132: *HTRW Guidance for Civil Works Projects*, and ASTM E1527-13: *Standard Practice for Environmental Site Assessment: Phase 1 Environmental Site Assessment Process*. These two documents outline a process which has three main components (excluding the report itself): the records review, site reconnaissance, and interviews.

1.2 Records Review

Perhaps the most critical part of the feasibility level HTRW evaluation is the records review. In this, records, maps and other documents that provide environmental information about the project area are obtained and reviewed. To complete the records review, USACE used a commercially available vendor of environmental database searches called Environmental Data Resources, of Shelton, CT. This records review was completed using the proposed footprint of the project, and the standard ASTM environmental record sources, along with an approximate 1 mile search distance for each of the sources shown in the below Table 1. Due to the size of the record search results, the Environmental Data Resources report will not be included here. Once the database searches were complete, USACE analyzed the results for recognized environmental conditions (RECs) that could affect the proposed project or need further investigation, given the proposed project measures. Due to the conservative search distances and specifics of the proposed project, many of the record search results can be dismissed from further consideration in this study. The results of that analysis, specifics of the REC (where applicable), and justification for dismissal from further evaluation (where applicable) are discussed below.

Table 2: Standard ASTM Search Distances and Records Review Results

ASTM Source	ASTM Distance (miles)	Searched Distance (miles)	Number of Results
Federal National Priorities List (NPL) site list	1.0	1.0	0
Federal Delisted NPL site list	0.5	1.0	0
Federal CERCLIS (SEMS) list	0.5	1.0	0
Federal NFRAP (SEMS archive) site list	0.5	1.0	1
Federal RCRA Corrective Action facilities list	1.0	1.0	0
Federal RCRA TSDF facilities list	0.5	1.0	0
Federal RCRA generators list	Property and adjacent properties only	1.0	0
Federal ICs/Engineering Control registry	Property only	1.0	0
Federal ERNS list	Property only	1.0	0
State and tribal equivalent NPL list	1.0	1.0	0
State and tribal equivalent CERCLIS	0.5	1.0	0
State and tribal landfill and/or solid waste disposal sites	0.5	1.0	0
State and tribal leaking AST/UST sites	0.5	1.0	18
State and tribal registered storage tank list	Property and adjacent properties only	1.0	7
State and tribal ICs/Engineering Control registry	Property only	1.0	0
State and tribal voluntary cleanup sites	0.5	1.0	3
Federal, State and tribal Brownfields site list	0.5	1.0	1

Federal NFRAP (SEMS archive) List – The Federal NFRAP list (now known as the SEMS archive list) tracks sites where no further remedial action is planned, based on available assessments and information. The list also represent sites that were not chosen for the NPL. Further EPA assessment could possibly be ongoing, and hazardous environmental conditions may still exist; however, in the absence of remedial action and assessment data, no determination about environmental hazards can be made. The records search identified 1 site on the CERCLIS NFRAP (SEMS archive) database. This case was closed in 1995, so not expected to impact the proposed project.

Federal RCRA TSDF List – The Federal RCRA TSDF list contains sites that are designated as Treatment, Storage, and Disposal facilities. These sites typically handle large amounts of hazardous waste, and are permitted under RCRA to do so. As such, no RCRA TSDFs are located on the subject property. Additionally, the presence of a TSDF is not sufficient to believe that contamination is likely to be generated, as long as the facility is permitted. As a result, no TSDF sites will be carried forward as REC's.

Federal RCRA Generators List – Similar to the TSDF list, the RCRA generators list identifies sites that generate quantities of waste classified as hazardous under RCRA. No sites were identified at the target property or adjacent properties.

State and Tribal Leaking AST/UST Sites – This database is a list of leaking petroleum storage tank incidents, maintained by the State of Texas. A search of this database identified 18 sites within a one mile radius of the target property. Despite the large number of sites nearby, none of the sites are expected to impact the proposed project due to the fact that all of the cases have been closed and cleared out. Only one of the sites, Gillespie Ford, impacted the project area in the past (case closed in 1999), since the contamination was listed within 500 ft. of the surface water source, the potential for discharge into river was likely. However, because this is an incident that was closed out over 10 years ago it is not expected to impact the River Road project.

State and Tribal Registered Storage Tanks – This list is a combination of the State of Texas registered UST and AST databases, representing sites with storage tanks registered with the State of Texas. 7 sites were identified. However, the existence of a registered storage tank (UST or AST) is not sufficient to believe that contamination is likely to be generated, and therefore none of these sites will be carried forward as REC's.

Federal Institutional Controls (IC)/Engineering Controls Registry – Engineering controls and ICs are both methods of preventing exposure to contaminants on a particular site. This database is a listing of sites where one or both of those controls are in place. There weren't any sites with these measures in place that were identified within a one mile radius of River Road. However, the ASTM standard only requires that the proposed project property be searched for ICs or engineering controls.

State and Tribal Solid Waste Facilities/Landfill Sites – This search is designed to check any state or tribal databases for solid waste handling facilities or landfills in the project vicinity. No sites were found within the search area.

State and Tribal Registered Storage Tanks – This list is a combination of the State of Texas registered UST and AST databases, representing sites with storage tanks registered with the State of Texas. Within a mile radius there were 3 tanks identified. However, the existence of a registered storage tank (UST or AST) is not sufficient to believe that contamination is likely to be generated, and therefore none of these sites will be carried forward as REC's.

State and Tribal Voluntary Cleanup Sites – This database identifies sites where the responsible party chooses to clean up the site themselves with TCEQ oversight. 3 sites were identified from this database, although the majority of these sites had already completed their respective remedial actions. The sites of concern from this list are sites where active remediation or investigation is occurring, sites where the VCP application was withdrawn but the site shows up on other databases, or sites where the VCP application was denied. Only one of the sites is listed as still under investigation for groundwater contamination by heavy metals, VOC's, SVOC's, Chlorinated Solvents, and/or TPH, although it is not an adjacent property. Given the distance from the target property and that the listing is over 10 years old, no VCP sites will be carried forward as REC's.

Brownfields List – The Brownfields database is a list of sites where information has been reported back to EPA Brownfields Assessment office. This does not mean these sites were selected as Brownfields for redevelopment. One site, Pearl Brewery, was found in the search area, but doesn't pose any hazard to the proposed project.

1.3 Site Visit

The site visit in environmental investigations is designed to identify environmental conditions that would otherwise not be identified in the records search. The site visit also is used to look at indoor areas and area usages on the subject property. Due to the proposed action occurring mostly in-and directly adjacent to a water body, surrounded by land used primarily for recreation, a site visit will not be conducted for this phase of the investigation.

1.4 Interviews

The objective of the interviews is to discover environmental conditions that could not be obtained in the records search, as well as to determine past uses of the subject property. Due to the nature of the proposed project and its ownership, it is expected that the subjects and scope of the interviews for this project will be limited. The subjects and necessity of the interviews will be determined at a later time, once the records search is completed and time allowed for the narrowing of potential interviewees.

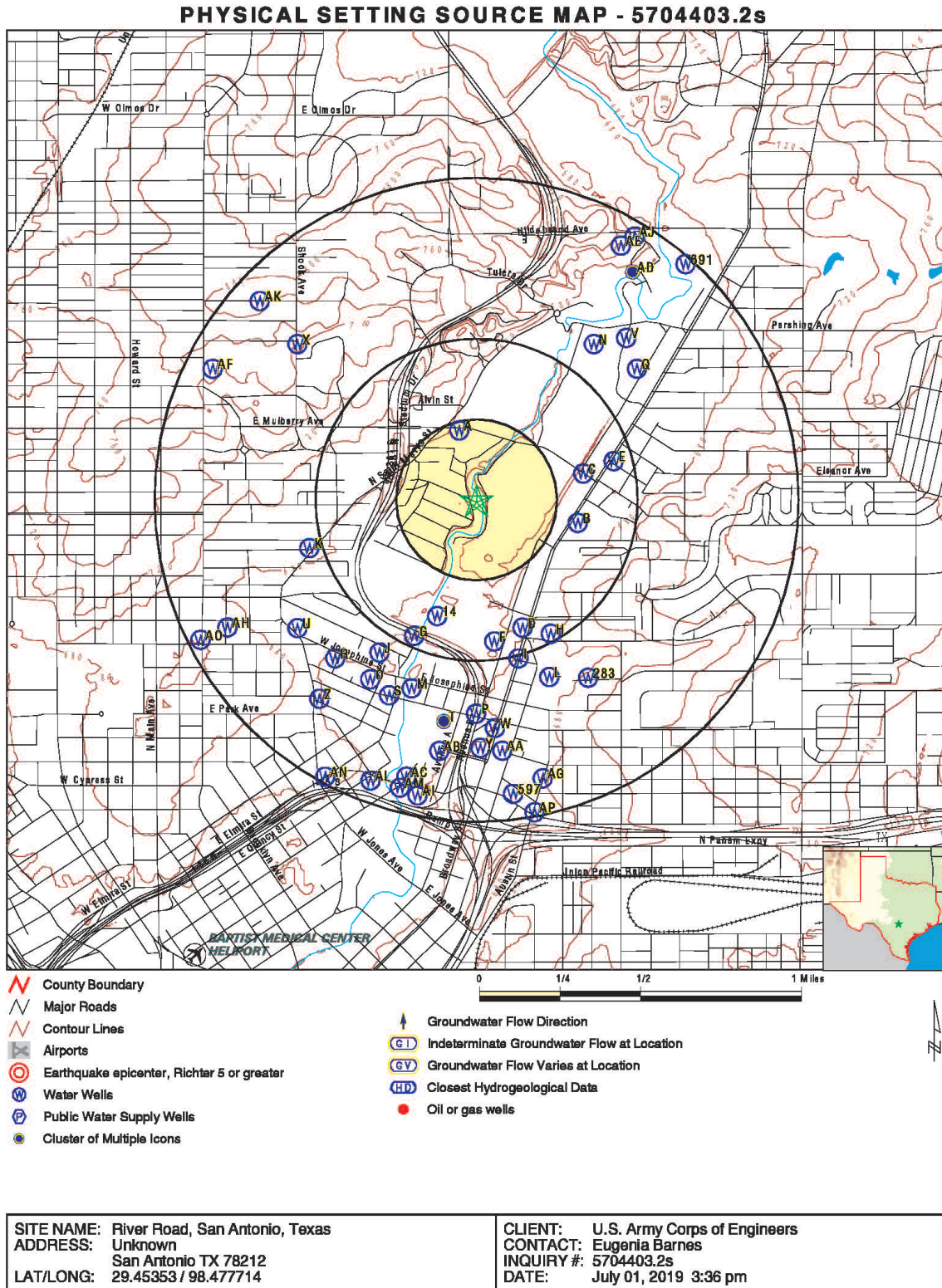
1.5 Conclusion of Background Records Review

In order to complete a feasibility level HTRW evaluation for River Road, this report was completed following the rules and guidance of ER 1165-2-132: *HTRW Guidance for Civil Works Projects*, and ASTM E1527-13: *Standard Practice for Environmental Site Assessment: Phase 1 Environmental Site Assessment Process*. No sites were found that had recognized environmental conditions.

Figure 2: Map of River Road HTRW Sites



Figure 2: Map of River Road Wells



2 Existing Conditions

2.1 General Description

In order to complete a feasibility level HTRW evaluation for the River Road, San Antonio Stream Restoration Project, a records search was conducted following the rules and guidance of ER 1165-2-132: HTRW Guidance for Civil Works Projects, and ASTM E1527-13: Standard Practice for Environmental Site Assessment: Phase 1 Environmental Site Assessment Process. In the records review, files, maps and other documents that provide environmental information about the project area are obtained and reviewed. To complete the records review, USACE reviewed publicly available databases and sources, using the proposed footprint of the project, along with an approximate 1 mile search distance for each of the sources. The records search revealed several potential HTRW sites in Bexar County, although none of these sites have the potential to affect the proposed project. See the HTRW appendix for more information about risks from these sites.

The San Antonio River at River Road is heavily eroded with lots of sedimentation. The river has the potential to disturb adjacent soils and receive discharges from surrounding sites. There are several potential HTRW sites in relative proximity (one mile) to the proposed project footprint, including, 1 archived Superfund site, 7 UST sites, 3 past Voluntary Cleanup Sites, and 1 leaking storage tank which impacted groundwater in the past, as well as 17 other leaking storage tank listings. In most cases, the records indicate that final concurrence for closure was issued, meaning that either the tank was removed and cleaned up to the satisfaction of the State, or that the leak was fixed and it was determined that no exposure to the contents had occurred. Which means the identified sites within one mile of the proposed project are unlikely to impact the proposed project.

Although not classified as HTRW, wells and other infrastructure within the immediate area are contributing factors to existing conditions. Within 1 mile of the study area there are over 700 wells listed on the state database. With such a large number of wells in the area, excavations may come into contact with one or more of these wells. Awareness of such locations may prevent unintentional releases, such as brine or other groundwater contaminants, if these features are disrupted. Figure 2 displays these underground features along with additional related information. Going forward, it is important to note that disruptions to the water table (and its depth) will affect overall groundwater flow, which is a key mechanism in spreading HTRW contaminants.

3 Expected Future Without-Project Conditions

The HTRW situation in and around River Road will most likely stay the same in the future without project condition. The land directly adjacent to the subject property is primarily used for recreation. The study area has historically been surrounded by a golf course, City Park, residential neighborhood and major roads. Development of the area can reasonably be expected to grow in conjunction with the developing metropolis, San Antonio. More development would increase the likelihood of future HTRW issues. The use of petroleum,

chemicals, and other hazardous materials will continue in the project vicinity with or without the implementation of the proposed project. The extent to which HTRW sites continue to be created and discovered is impossible to predict, although currently existing HTRW concerns can be expected to be remediated over time.

4 Future With-Project Conditions

In order to complete a feasibility level HTRW evaluation for the River Road Project, a records search was conducted following the rules and guidance of ER 1165-2-132: *HTRW Guidance for Civil Works Projects*, and ASTM E1527-13: Standard Practice for Environmental Site Assessment: Phase 1 Environmental Site Assessment Process. The purpose of this search was to identify any sites where hazardous substances or petroleum products have been released or are likely to have been released to soil, groundwater, or surface water in the proposed project area. In order to conduct the records search, an Environmental Data Resources, Inc. (EDR) report was purchased in July 2019.

As discussed in the HTRW appendix, the governmental records search yielded multiple results within 1.0 mile of the River Road study area, although none of these sites has the potential to affect the proposed project. This is due to the extended period of time since most of the cases were closed, as well as their relative distance from the proposed project area. If a site is discovered during construction, activities would be stopped until the hazardous and toxic waste material is properly contained and disposed of in compliance with applicable Federal, state and local regulations.

Although not classified as HTRW, underground wells play an important role in the overall existing conditions in and around the River Road study area. Numerous wells are located within 1.0 mile of the River Road study area and most of the project alternatives have the potential to interact in some way with this underground infrastructure. Refer to the HTRW Appendix for a map of known water wells in the study area vicinity. The project alternatives involving excavations and displacement of sediment or soil materials, may need to consider these wells prior to project implementation.

5 *References

2019. EDR Report. Environmental Data Resources - Shelton, CT. www.edrnet.com

2019. Environmental Protection Agency. Envirofacts Web-Mapper. <https://enviro.epa.gov/facts/multisystem.html>

2019. Environmental Protection Agency. Cleanups in my Community Web-Mapper. https://19january2017snapshot.epa.gov/cleanups/cleanups-my-community_.html

*Sections that fulfill NEPA requirements for an EA