

# A-8: Hazardous, Toxic and Radioactive Waste Analysis

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Environmental Site Assessment:  
Phase I

## **JCER HTRW Appendix**

### 1.0 Introduction

In order to complete a feasibility level HTRW evaluation for the Jefferson County Ecosystem Restoration Project (JCER), 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 I Environmental Site Assessment Process*.

### 2.0 Records Review

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 shown in the below Table 1. 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. Note that only databases with results found are discussed in detail below.

Table 1: Standard ASTM Search Distances and Records Review Results

ASTM Source	ASTM Distance (miles)	Distance Searched (miles)	Number of Results	Source Name
Federal National Priorities List (NPL) site list	1.0	1.0	0	EPA Cleanups In My Community
Federal Delisted NPL site list	0.5	1.0	0	EPA Cleanups In My Community
Federal CERCLIS (SEMS) list	0.5	1.0	0	EPA EnviroFacts
Federal NFRAP (SEMS archive) site list	0.5	1.0	0	EPA EnviroFacts
Federal RCRA Corrective Action facilities list	1.0	1.0	0	EPA Cleanups In My Community
Federal RCRA TSD facilities list	0.5	1.0	0	EPA EnviroFacts
Federal RCRA generators list	Property and adjacent properties only	1.0	8, including unknown RCRA	EPA EnviroFacts
Federal ICs/Engineering Control registry	Property only	N/A	N/A	Source not found*
Federal ERNS list	Property only	N/A	See below*	National Response Center
State and tribal equivalent NPL list	1.0	1.0	0	Texas Superfund Registry
State and tribal equivalent CERCLIS	0.5	1.0	1	TCEQ Central Registry
State and tribal landfill and/or solid waste disposal sites	0.5	1.0	0	TCEQ Central Registry
State and tribal leaking AST/UST sites	0.5	1.0	1	TCEQ Central Registry
State and tribal registered storage tank list	Property and adjacent properties only	1.0	4	TCEQ Central Registry
State and tribal ICs/Engineering Control registry	Property only	N/A	N/A	Source not found*
State and tribal voluntary cleanup sites	0.5	1.0	0	TCEQ Central Registry
Federal, State and tribal Brownfields site list	0.5	1.0	0	EPA Cleanups In My Community

\* Denotes a data failure

Federal RCRA Generators List – The RCRA generators list identifies sites that generate quantities of waste classified as hazardous under the Resource Conservation and Recovery Act, or RCRA. 8 sites were identified within a one mile radius of the proposed project area, sorted by the quantity of waste they generate (Table 2). Two sites were classified as small quantity generators (SQG), 4 sites as conditionally exempt small quantity generators (CESQG), and 2 sites were listed as having an unknown classification. All but one of these sites were located in the southern end of Sabine Pass, which is a neighborhood of Port Arthur, and can only be reasonably seen as a risk to the marsh elevation planned for the eastern

portion of Texas Point. The one exception is the Golden Pass LNG Terminal, which is located approximately a half mile east of Keith Lake, and is in relative proximity to the marsh restoration features planned for the area south of the lake. However, the simple fact of generator status is not sufficient to expect an impact from any of the 8 facilities found. As a result, none of these sites will be carried forward as RECs.

Table 2: RCRA Results

Site Name	Location	RCRA Status
Sabine Pass Shore Base (Chevron)	Exact Location Unknown, 1 <sup>st</sup> Ave., Sabine Pass	SQG
Tetra Technologies	8640 S. 1 <sup>st</sup> Ave., Sabine Pass	CESQG
U.S. Coast Guard Station	7034 S. 1 <sup>st</sup> Ave., Sabine Pass	CESQG
Rowan Co.	8010 S. 1 <sup>st</sup> Ave., Sabine Pass	SQG
Martin Operating Partnership, LLC.	7680 S. 1 <sup>st</sup> Ave., Sabine Pass	CESQG
El Paso Field Services/Genesis Energy	7912 S. 1 <sup>st</sup> Ave., Sabine Pass	Unknown
Golden Pass LNG Terminal	3752 S. Gulfway, Sabine Pass	CESQG
Vastar Resources	8415 S. 1 <sup>st</sup> Ave., Sabine Pass	Unknown

Federal Institutional Controls (IC)/Engineering Controls Registry – Engineering controls and ICs are both methods of preventing exposure to contaminants on a particular site, typically sites where contaminants are confined or controlled on site as part of a cleanup remedy. This database is a listing of sites where one or both of those controls are in place. USACE was unable to locate this EPA database, and this can be considered a data failure as defined by the ASTM standard. However, the ASTM standard only requires that the proposed project property be searched for ICs or engineering controls. Since these controls are typically only used at cleanup sites where contaminants are confined onsite, and the other record searches identified no existing cleanup sites within the proposed project footprint, it can be assumed that no ICs or engineering controls are present within the proposed project footprint.

Federal ERNS List – The Federal Emergency Response Notification System (ERNS) records and stores information on reported releases of oil and hazardous substances which are reported to the United States Coast Guard’s National Response Center (NRC). However, much of the information in the database was incomplete, or did not give a specific location. Even if location information was recorded, it was often impossible to discern exactly what material or substance the release or spill consisted of. As a result of these limitations, it was impossible to resolve the data closer than the County level. There were 12,768 incidents reported to the NRC in Jefferson County between 1982 and 2016. Out of these incidents, 487 were listed as occurring in Sabine Pass and 32 incidents were reported in Sabine Pass in 2016. Several incidents between 1982 and 2016 were located in Sea Rim State Park, including 2 emergency responses involving abandoned drums on the park’s beach. Still, without specific data about each response or spill, it’s impossible to determine whether any RECs are present in the proposed project.

State and Tribal Equivalent CERCLIS – The State a Tribal Equivalent CERCLIS ASTM source refers to any State or Tribal list that shows cleanup sites (other than State Superfund sites) under the jurisdiction of State or Tribal government. In this case, the TCEQ Central Registry lists sites being cleaned up under a variety of State cleanup programs. Only one site was found from this database, listed as the Enterprise Products Operating Pipeline, Jefferson County Segment. This site was listed as an active State industrial hazardous waste corrective action, which essentially denotes a violation of State hazardous waste handling laws. However, no specific location or additional information is provided. Without specific location information, it’s impossible to determine whether any RECs are present in the proposed project.

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 1 site with a leaking petroleum storage tank within a one mile radius of the proposed project footprint. The site, known as the Martin Operating Partnership LLC site, is located at 7680 S. 1<sup>st</sup> Avenue in Sabine Pass, and is also one of the 4 Conditionally Exempt Small Quantity Generators referenced above from the RCRA Generators list. This site can only be reasonably seen as a risk to the marsh elevation planned for the eastern portion of Texas Point. However, due to the relatively large distance (over 0.5 miles) from the proposed project site, no affect can be expected from this leaking petroleum tank site.

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. Four sites were identified within a mile of the proposed project footprint (Table 3). However, the existence of a registered storage tank (UST or AST) is not sufficient to believe that significant contamination is likely to be generated, and none of the listed sites are within the proposed project footprint. Therefore none of these sites will be carried forward as RECs.

Table 3: State Registered Storage Tanks Results

Site Name	Location
Rowan Co.	8010 S. 1 <sup>st</sup> Ave., Sabine Pass
Horizon Offshore/CalDive/Craft Oil Co.	7366 S. 1 <sup>st</sup> Ave., Sabine Pass
BP High Island 24L Production Facility	Location Unknown
Sabine Pilot Service	7904 S. 1 <sup>st</sup> Ave., Sabine Pass

State and Tribal ICs/Engineering Control registry – This ASTM source refers to any listing of sites where one or both of those controls are in place, and are within the State of Tribal jurisdiction. USACE was unable to locate this Texas State database, and this can be considered a data failure as defined by the ASTM standard. However, the ASTM standard only requires that the proposed project property be searched for ICs or engineering controls. Since these controls are typically only used at cleanup sites where contaminants are confined onsite, and the other record searches identified no existing cleanup sites within the proposed project footprint, it can be assumed that no ICs or engineering controls are present within the proposed project footprint.

### 3.0 Pipeline and Oil Wells

Although not classified as HTRW, pipelines and oil wells play an important role in determining the acceptability of project alternatives. Project measures often must be designed around oil and gas infrastructure, especially if the pipelines or wells cannot be relocated. In order to search for pipelines and oil wells in the proposed project footprint, USACE reviewed the public GIS system maintained by the Railroad Commission of Texas (RRC), the State agency tasked with regulating this type of infrastructure.

Due to its location in Southeast Texas and adjacent to Louisiana, Jefferson County has a great deal of oil wells and pipelines within its boundaries, as well as immediately offshore. Some of these wells and pipelines have the potential to affect proposed project alternatives. Numerous plugged oil and gas wells are located offshore within 1.5 miles of the shoreline, and within the Texas Point marsh restoration area. The RRC database also shows numerous operating oil, gas, and injection wells north of Johnson and Keith Lake. Several pipelines are shown immediately offshore, and several make landfall east of High Island and within Sea Rim State Park. Several pipelines can also be found in the Texas Point restoration area. Refer to Figures 1 and 2 for maps of known pipelines in Jefferson County. The project alternatives involving offshore breakwaters and marsh restoration may need to consider these oil and gas wells and pipelines.

#### 4.0 Conclusion

In order to complete a feasibility level HTRW evaluation for the JCER, 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*. No sites were found that had recognized environmental conditions (RECs). However, several pipelines and oil and gas wells located in and near the proposed project footprint have the potential to affect the proposed project.

Figure 1: Western Jefferson County Pipelines

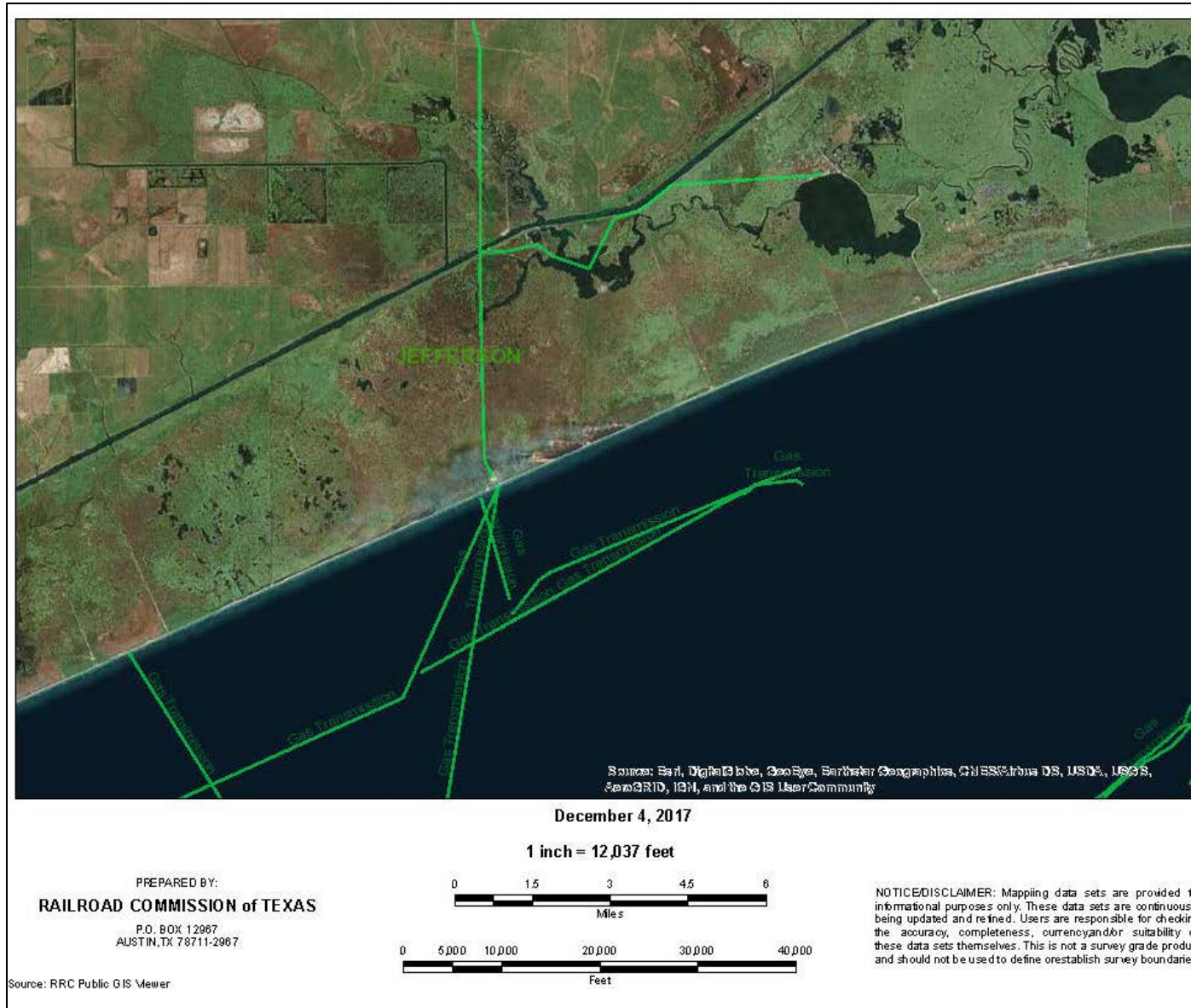


Figure 2: Eastern Jefferson County Pipelines

