FINAL

Community Environmental Response Facilitation Act (CERFA) Report

New Orleans Military Ocean Terminal (NOMOT), New Orleans, LA

Prepared for

U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND 21010

Prepared by

ENVIRONMENTAL RESOURCES MANAGEMENT, INC.
855 Springdale Drive
Exton, PA 19341

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11 APRIL 1994

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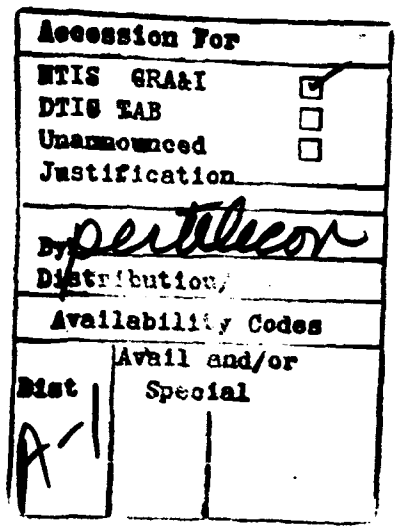

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13. ABSTRACT (Maximum 200 words)

This report presents the results of the Community Environmental Response Facilitation Act (CERFA) investigation conducted by Environmental Resources Management (ERM) at New Orleans Military Ocean Terminal (NOMOT), a U.S. Government property selected for closure by the Base Realignment and Closure (BRAC) Commission under Public Laws 100-526 and 101-510. Under CERFA (Public Law 102-426), Federal agencies are required to identify expeditiously real property that can be immediately reused and redeveloped. Satisfying this objective requires the identification of real property where no hazardous substances or petroleum products, regulated by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), were stored for one year or more, known to have been released, or disposed.

NOMOT is a 17.6-acre site located in New Orleans, Louisiana. NOMOT has been used for warehousing and shipping of equipment since 1919. Environmentally significant operations include routine maintenance and hazardous material handling.

ERM reviewed existing investigation documents; U.S. Environmental Protection Agency (EPA), State, and county regulatory records; environmental data bases; and title documents pertaining to NOMOT during this investigation. In addition, ERM conducted interviews and visual inspections of NOMOT as well as visual inspections of and data base searches for the surrounding properties.

Information in this CERFA report was current as of the site visit by ERM in October 1993. This information was used to divide the installation into two categories of parcels: CERFA Disqualified Parcels and CERFA Parcels, as defined by the Army.

The total BRAC property acreage at NOMOT is 17.6 acres. Areas of the facility that have no history of CERCLA-regulated hazardous substance or petroleum product release, disposal, or storage for one year or more; and no history of other environmental hazards (such as asbestos, radon gas, lead-based paint, unexploded ordnance, radionuclides, or not in-use equipment containing polychlorinated biphenyls), are categorized as CERFA Parcels. One (1) CERFA Parcel, comprising 2.4 acres, was identified. The CERFA Parcel is located at the westernmost end of the property.

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ACRONYMS AND ABBREVIATIONS

ACM	Asbestos Containing Material
AEHA	Army Environmental Hygiene Agency
AREE	Area Requiring Environmental Evaluation
AST	Aboveground Storage Tank
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERFA	Community Environmental Response Facilitation Act
EI	Environmental Investigation
EPA	Environmental Protection Agency
ERM	Environmental Resources Management
ERNS	Emergency Response Notification System
FS	Feasibility Study
FY	Fiscal Year
IRP	Installation Restoration Program
ISSA	Inter-Service Support Agreement
LBP	Lead-based Paint
LDEQ	Louisiana Department of Environmental Quality
MARAD	U.S. Maritime Administration
NEPA	National Environmental Policy Act
NOMOT	New Orleans Military Ocean Terminal
NPDES	National Pollutant Discharge Elimination System

NRC	Nuclear Regulatory Commission
^{o}F	Degrees Fahrenheit
PA	Preliminary Assessment
PCB	Polychlorinated Biphenyl
POL	Petroleum, Oil, and Lubricant
POL	Petroleum, Oil, and Lubricant
POV	Privately-Owned Vehicle
ppb	Parts Per Billion
ppm	Parts Per Million
PX	Post Exchange
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
SI	Site Inspection
USAEC	U.S. Army Environmental Center
USATHAMA	U.S. Army Toxic and Hazardous Materials Agency
USDA	U.S. Department of Agriculture
UST	Underground Storage Tank
UXO	Unexploded Ordnance

This report presents the results of the Community Environmental Response Facilitation Act (CERFA) investigation conducted by Environmental Resources Management (ERM) at New Orleans Military Ocean Terminal (NOMOT), a U.S. Government property selected for closure by the Base Realignment and Closure (BRAC) Commission under Public Laws 100-526 and 101-510. Under CERFA (Public Law 102-426), Federal agencies are required to identify expeditiously real property that can be immediately reused and redeveloped. Satisfying this objective requires the identification of real property where no hazardous substances or petroleum products, regulated by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), were stored for one year or more, known to have been released, or disposed.

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Areas of the facility that had no evidence of CERCLA-regulated hazardous substance or petroleum product release, disposal, or storage for one year or more, but contained other environmental hazards (such as

asbestos, radon gas, lead-based paint, unexploded ordnance, radionuclides, or not in-use equipment containing polychlorinated biphenyls) were categorized as CERFA Parcels with Qualifiers. No CERFA Qualified Parcels were identified.

Areas of the facility, for which there is a history of release, disposal, or storage for one year or more of CERCLA-regulated hazardous substances or petroleum products or had a release of the other environmental hazards identified above were categorized as CERFA Disqualified Parcels. One (1) CERFA Disqualified Parcel, comprising 15.2 acres, was identified.

Areas of the facility that will be retained by the Federal Government or that have already been transferred by deed are categorized as CERFA Excluded Parcels. None of the property was identified as CERFA Excluded.

The primary objective of CERFA is satisfied by the identification of CERFA Parcels and CERFA Qualified Parcels. As a result, concurrence has been sought from the regulatory agencies on these two categories of parcels. This CERFA Report has been reviewed by the U.S. Army Environmental Center (USAEC), EPA Region VI, and the Louisiana Department of Environmental Quality (LDEQ). Comments received from regulatory agencies and USAEC's responses to those comments are located in the Appendix. Concurrence on this report was received from LDEQ.

This report contains maps that summarize the categorization of NOMOT on the basis of the above definitions. This Executive Summary should be read only in conjunction with the complete CERFA Report for this installation. The CERFA Report provides the relevant environmental history to substantiate the parcel categorization. This report does not address other property transfer requirements that may be applicable under the National Environmental Policy Act (NEPA), nor does it address natural resource considerations such as the threat to plant or animal life.

1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

Public Laws 100-526 and 101-510 designated more than 100 Department of Army facilities for closure and realignment. As a result, it became necessary to expedite the environmental investigation and cleanup process, as necessary, prior to the release and reuse of Army Base Realignment and Closure (BRAC) property. The BRAC environmental restoration program was established in 1989 with the first round (BRAC 88) of base closures and continued with subsequent rounds (BRAC 91, BRAC 93, etc.). The BRAC program is patterned after the Army's Installation Restoration Program (IRP), except that it has been expanded to include such categories of contamination as asbestos, radon, polychlorinated biphenyls (PCBs), and others that are not normally addressed under the Army IRP.

The BRAC environmental restoration program begins by conducting enhanced Preliminary Assessments (PAs). The term "enhanced" is used to distinguish these assessments from previous IRP preliminary assessments since the BRAC PAs are conducted from a property transfer perspective and evaluate areas which are not included in the IRP (e.g., asbestos, radon, PCBs). The enhanced PAs include reviews of existing installation documents, regulatory records, and aerial photographs; a site visit and visual inspection; and employee interviews. Enhanced PAs were conducted for BRAC 88 and BRAC 91 installations, and are currently underway at BRAC 93 installations. An Enhanced PA was prepared for the New Orleans Military Ocean Terminal in December 1989 by Roy F. Weston, Inc., under the direction of USAEC (formerly the U.S. Army Toxic and Hazardous Materials Agency [USATHAMA]).

In October 1992, Public Law 102-426, the Community Environmental Response Facilitation Act (CERFA) amended Section 120 (h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and established new requirements with respect to contamination assessment, cleanup, and regulatory agency notification/concurrence for federal facility closures. CERFA requires the federal government, before termination of federal activities on real property owned, to identify property where no hazardous substances were stored, released, or disposed of. Also, the designation must be concurred with by the appropriate regulatory agency (U.S. Environmental Protection Agency for National Priority List (NPL) bases and state for non-NPL bases). These requirements retroactively affect the Army BRAC 88

and BRAC 91 environmental restoration activities, and are being implemented at BRAC 93 sites concurrently with their enhanced PAs. The primary CERFA objective is for federal agencies to expeditiously identify real property offering the greatest opportunity for immediate reuse and redevelopment. Although CERFA does not mandate the Army transfer real property so identified, the first step in satisfying the objective is the requirement to identify real property where no CERCLA-regulated hazardous substances or petroleum products were stored, released, or disposed. A Parcel may be transferred by deed during the remedial action if the approved remedy has been constructed and its "proper and successful" operation is demonstrated to EPA. Such transfers by deed must reserve a right of access to allow the United States to perform any additional remedial of corrective action.

Environmental Resources Management, Inc. (ERM) was awarded the task to identify real property where no CERCLA-regulated hazardous substances or petroleum products were stored, released, or disposed at twelve BRAC 88 sites. Under this task, an Execution Plan was developed to describe the process in satisfying the CERFA task objective. The purpose of this report is to present the findings for the New Orleans Military Ocean Terminal (NOMOT), Louisiana.

1.2 *DEFINITION OF TERMS*

The following definitions are used to categorize and label parcels identified on the installation:

- CERFA Parcel - A portion of the installation real property for which investigation reveals no evidence of storage for one year or more, release, or disposal of CERCLA hazardous substances, petroleum, or petroleum derivatives and no evidence of being threatened by migration of such substances. CERFA Parcels include areas where PCB containing equipment is in operation, but there is no evidence of release. CERFA Parcels also include any portion of the installation which once contained related environmental, hazard, or safety issues including unexploded ordnance (UXO) located on firing ranges or impact areas, radon, stored (not in-use) PCB containing equipment, asbestos contained within building materials, radionuclides contained within products being used for their intended purposes, and lead-based paint applied to building material surfaces, but which have since been fully remediated or removed.
- CERFA Qualified Parcel- A portion of the installation real property for which investigation reveals no evidence of storage for one year or more, release, or disposal of CERCLA hazardous substances, petroleum, or petroleum derivatives and no evidence of being

threatened by migration of such substances. Parcel does, however, contain related environmental, hazard, or safety issues including unexploded ordnance (UXO) located on firing ranges or impact areas, radon, radionuclides contained within products being used for their intended purposes, asbestos contained within building materials, lead-based paint applied to building material surfaces, or stored (not in use) PCB-containing equipment.

- CERFA Disqualified Parcel - A portion of the installation real property for which investigation reveals evidence of a release, disposal, or storage for more than one year of a CERCLA hazardous substance, petroleum, or petroleum derivative; or a portion of the installation threatened by such a release or disposal. CERFA Disqualified Parcels also include any portion of the installation where PCB, asbestos containing material, lead-based paint residue, radionuclides, or any ordnance has been disposed of, and any locations where chemical ordnance has been stored. Additionally, CERFA Disqualified Parcels include any areas in which CERCLA hazardous substances or petroleum products have been released or disposed of and subsequently fully remediated.
- CERFA Excluded Parcel - A portion of the installation real property retained by the Department of Defense, and therefore not explicitly investigated for CERFA. CERFA Excluded Parcels also include any portions of the installation which have already been transferred by deed to a party outside the federal government, or by transfer assembly to another federal agency.

The following labels are used in conjunction with the identified parcels. Each parcel is given a unique number to which the appropriate labels are attached.

- P = CERFA Parcel
- Q = CERFA Qualified Parcel
- D = CERFA Disqualified Parcel
- E = CERFA Excluded Parcel

EXAMPLE: 4P indicates that the fourth parcel is in the CERFA Parcel category.

The presence of related environmental, hazard, and safety issues, responsible for placing a parcel in the CERFA Qualified Parcel category, is indicated by the following labels:

- A = Asbestos
- L = Lead-Based Paint

- P = PCB
- R = Radon
- X = Unexploded Ordnance (UXO)
- RD = Radionuclides

EXAMPLE: 5Q-L indicated that the fifth parcel is in the CERFA Qualified Parcel category because of the presence of lead-based paint.

The following designations are used to indicate the type of contamination or storage present in a parcel. Conditions responsible for placing a parcel in the CERFA Disqualified category are indicated by the following:

- PR = Petroleum Release
- PS = Petroleum Storage
- HR = Hazardous Release
- HS = Hazardous Storage

EXAMPLE: 12D-HR indicates that the twelfth parcel is in the CERFA Disqualified category because of evidence of hazardous release.

For all parcels, (P) [i.e., P with parentheses around it] is used to indicate that the presence of the contamination is possible, but that data is unavailable for verification.

EXAMPLE: 9Q-A(P) indicates that the ninth parcel is in the CERFA Qualified Parcel category because of the possible presence (unverified) of ACM.

OTHER EXAMPLES:

Parcel label 15D-HR/PS/A(P) indicates that the 15th parcel is in the CERFA Disqualified category based on evidence of a hazardous substance release and petroleum storage. It also contains possible ACM.

Parcel label 8Q-X/R indicates that the eighth parcel is in the CERFA Qualified Parcel category because of the presence of unexploded ordnance and radon.

1.3 GEOGRAPHICAL/ENVIRONMENTAL SETTING

NOMOT is located on the northwest intersection of the Mississippi River and the Inner Harbor Navigational Canal (Mississippi River-Gulf Outlet

Canal), within the corporate limits of New Orleans, Louisiana. The installation's address is 4400 Dauphine Street, New Orleans, Louisiana. Figure 1.3-1 is a Site Location Map. NOMOT is currently known as the 13th and 14th Medium Port Command; however, for historical consistency, NOMOT will be used to describe the facility throughout this report.

NOMOT is approximately 17.6 acres in size. NOMOT is bordered by Navy property to the north and east, the Mississippi River to the south, and private property to the west. The surrounding land is mainly residential with some commercial activity. Other shipping and warehousing operations are located to the west along the river. A site plan of the BRAC real property is provided in Figure 1.3-2.

The climate of New Orleans is humid and semi-tropical during a large portion of the year. New Orleans is virtually surrounded by water. The water bodies include the Gulf of Mexico, Lake Pontchartrain, Lake Borgne, and numerous bayous, lakes, and marshy delta land. These water bodies have a significant influence on the climate. New Orleans is south of the usual track of winter storms, but occasionally a storm center will form in the Gulf of Mexico.

The wind direction at New Orleans is fairly evenly distributed. North winds occur most frequently with a secondary maximum of south winds. Summer winds have a prevailing southerly direction providing moisture favorable for the formation of afternoon thunderstorms. West to northerly winds cause periods of hot dry weather during the summer.

Precipitation is fairly evenly distributed throughout the year. Summer precipitation occurs mainly from frequently heavy showers and thundershowers. July [normal precipitation of 6.73 inches (in.)], August (6.02 in.) and September (5.87 in.) are the wettest months. October is the driest month with normal precipitation of 2.66 inches. Snowfall is rare with an annual average of 0.1 inches.

Temperatures are moderated by the surrounding water bodies. July is the hottest month with a normal monthly temperature of 82.1 degrees Fahrenheit (°F), a daily maximum of 90.7°F, and a daily minimum of 73.5°F. The daily maximum temperatures during June (89.5°F), July (90.7°F), and August (90.2°F) show little variation. January is the coldest month with a normal monthly temperature of 52.4°F, a daily maximum of 61.8°F, and daily minimum of 43.0°F.

Severe thunderstorms with damaging winds and hail are infrequent, although thunderstorms with heavy rains are common. Thunderstorms occur on an average of 68 days per year. Tornados are rare, but water

spouts occur quite often on nearby lakes. Hurricanes and tropical storms move close enough to New Orleans to affect the general area. Tropical storms can produce high winds, heavy rain, flooding, and tornadoes. Severe damage can occur during these storms, but they occur infrequently.

NOMOT lies below the mean highwater of the Mississippi River and the northern border is defined by a flood wall which protects adjacent properties. The levee has a crest elevation of 24 ft above the Mean Gulf Level.

New Orleans is underlain by thick sequences of unconsolidated deposits of sand, silt, clay, and gravel. Subsurface materials in the New Orleans area consist of recent flood plain and deltaic alluvial deposits associated with river deposits and marshlands. Zones of organic clay characteristic of backswamp material are mixed with these sediments. Loess, a wind-derived sediment composed predominantly of silt-sized grains, may also be present in some areas. Soil material generally consists of silty clays interrupted by dense clay lenses that impede the downward migration of surface water. These materials are deposited in a structural trough known as the Mississippi embayment that plunges gulfward. The resulting wedge of sediments thickens seaward with a prevailing dip to the south.

The soil consists of lean to fat clays, silts, and fine sands, and contain beds of organic materials and peat bogs up to 10 feet thick. All soils are saturated. Soils vary in makeup from almost nonplastic silts to highly plastic clays, and contain varying amounts of sand and organic debris.

Southern Louisiana lies directly over the Gulf Coast geosyncline where alternating transgressive-regressive units consist almost entirely of sands, silts, and clays with abundant organic debris. Quaternary-age deposits comprise the upper 2,100 feet of the sequence, with all but the uppermost tens of feet being Pleistocene age. Inundation of the uppermost Pleistocene surface and deposition of Holocene sediments in a near-shore Gulf environment began about 12,000 years ago. The Holocene deposits completely blanketed the Pleistocene sediments and accumulated to a depth of 10 to over 50 feet. The actual Gulf shoreline was well to the north of New Orleans at this time, but water depths did not exceed 35 to 40 feet. This shallow marine environment changed about 4,600 to 5,000 years ago when a 34-mile long barrier island formed, that now lies directly beneath the northern part of the city between Lake Pontchartrain and the Metarie-Gentilly ridge. About 4,600 years ago the Mississippi River abandoned a course in central Louisiana and rapidly introduced fine-grained alluvium eastward into the New Orleans area as part of the St. Bernard delta complex (Kolb and Saucier 1982). The natural levees deposited by the Mississippi River continued to develop until the early 18th century, at

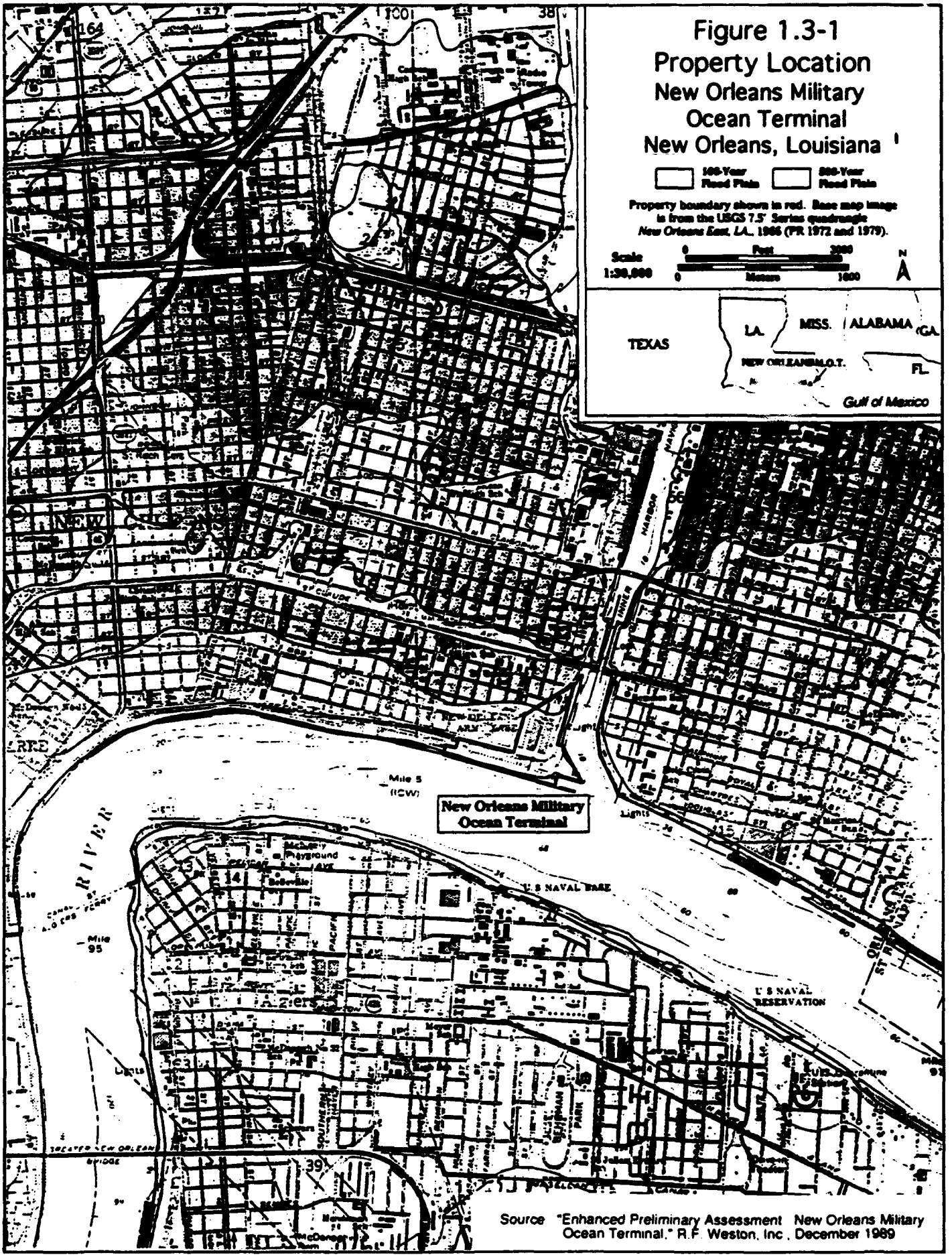


Figure 1.3-1
Property Location
New Orleans Military
Ocean Terminal
New Orleans, Louisiana
100-Year Flood Plain
500-Year Flood Plain
Property boundary shown in red. Base map image is from the USGS 7.5' Series quadrangle New Orleans East, LA, 1986 (PR 1972 and 1979).
Scale 1:30,000
Feet
Meters
N
TEXAS
LA.
MISS.
ALABAMA
GA.
FL
NEW ORLEANS M.O.T.
Gulf of Mexico
New Orleans Military Ocean Terminal
Mile 5 (ICW)
Mile 95
U.S. NAVAL BASE
U.S. NAVAL RESERVATION
RIVER
Source "Enhanced Preliminary Assessment New Orleans Military Ocean Terminal," R.F. Weston, Inc., December 1989

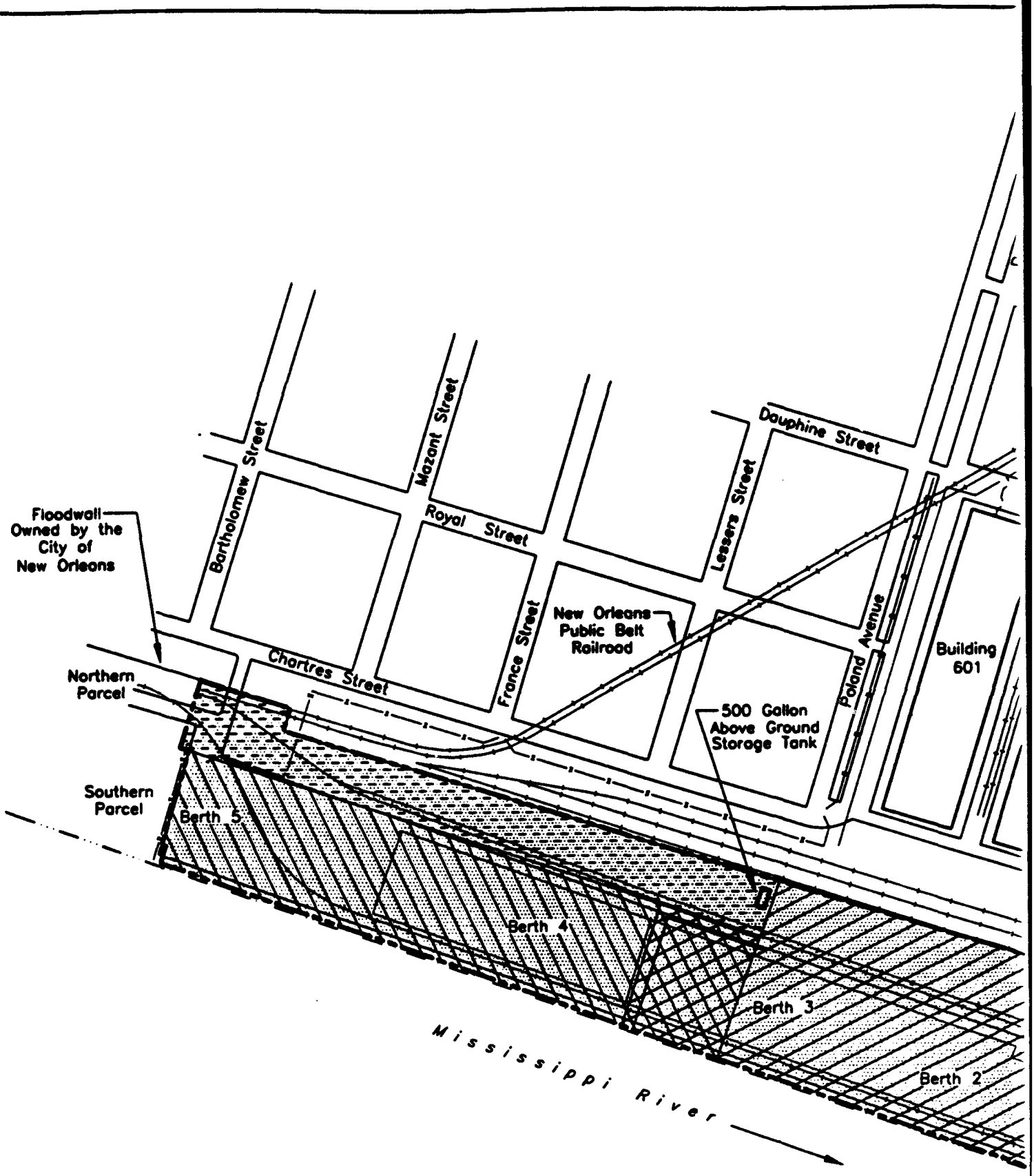
which time artificial flood control levees stopped overbank flooding and incremental alluvial deposition (Kolb and Saucier 1982).

The aquifers supplying ground water to most of Louisiana are contained within Quaternary and Tertiary sediments deposited in the Gulf Coast geosyncline and the Mississippi embayment. The aquifers of southeast Louisiana consist of Pleistocene alluvial and terrace deposits and Pliocene and Miocene sediments that outcrop in southwestern Mississippi. The deposits that constitute the individual aquifers are not readily differentiated at the surface and act as one hydraulic system that can be subdivided into several hydrologic zones in the subsurface.

The Mississippi River serves as a public drinking water source. Two water treatment plants pump water from the Mississippi River to serve the New Orleans metropolitan area. Both water intakes are located upriver of NOMOT.

In the New Orleans area, potable quantities of fresh ground water are difficult to encounter at any depth below the ground surface. The ground water at NOMOT was reported as brackish and is believed to be generally 8 to 10 feet below ground. This shallow aquifer is expected to flow toward the river when the river is in low stage and away when the river is high. Any shallow aquifer(s) that exist in the depth interval 0 to 150 feet below land surface have low yields. These water-bearing deposits include point bar and distributary channel deposits associated with the Mississippi River.

There is no evidence of sensitive wildlife within 3 miles of the facility. The pallid sturgeon, a species proposed for listing, and the salt marsh top minnow, a rare fish, have been detected in the Mississippi River, south of New Orleans. There are wetlands within one mile of the facility. There are at least seven waterbird nesting colonies in this portion of the river and also in the deltaic marshes.



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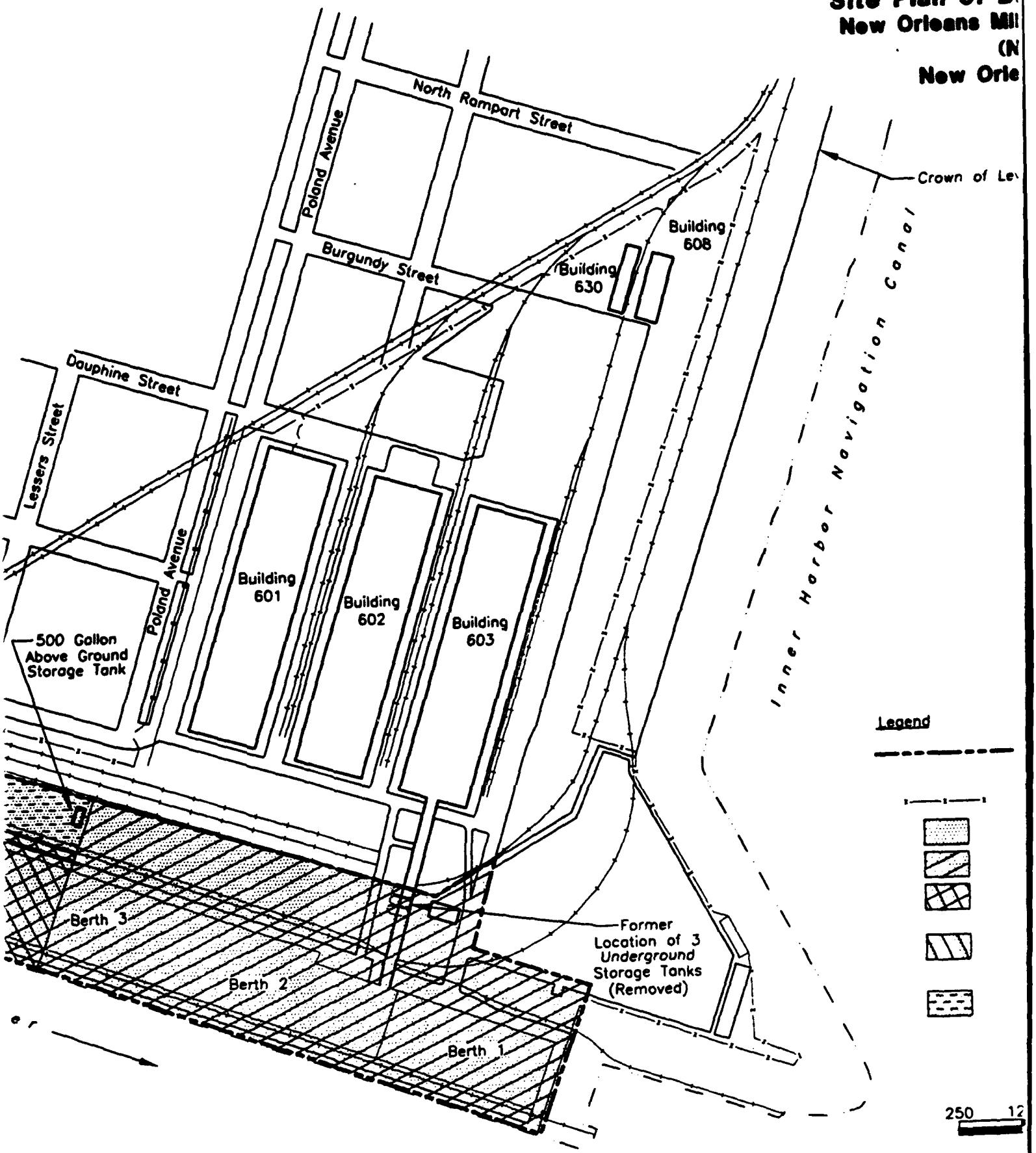

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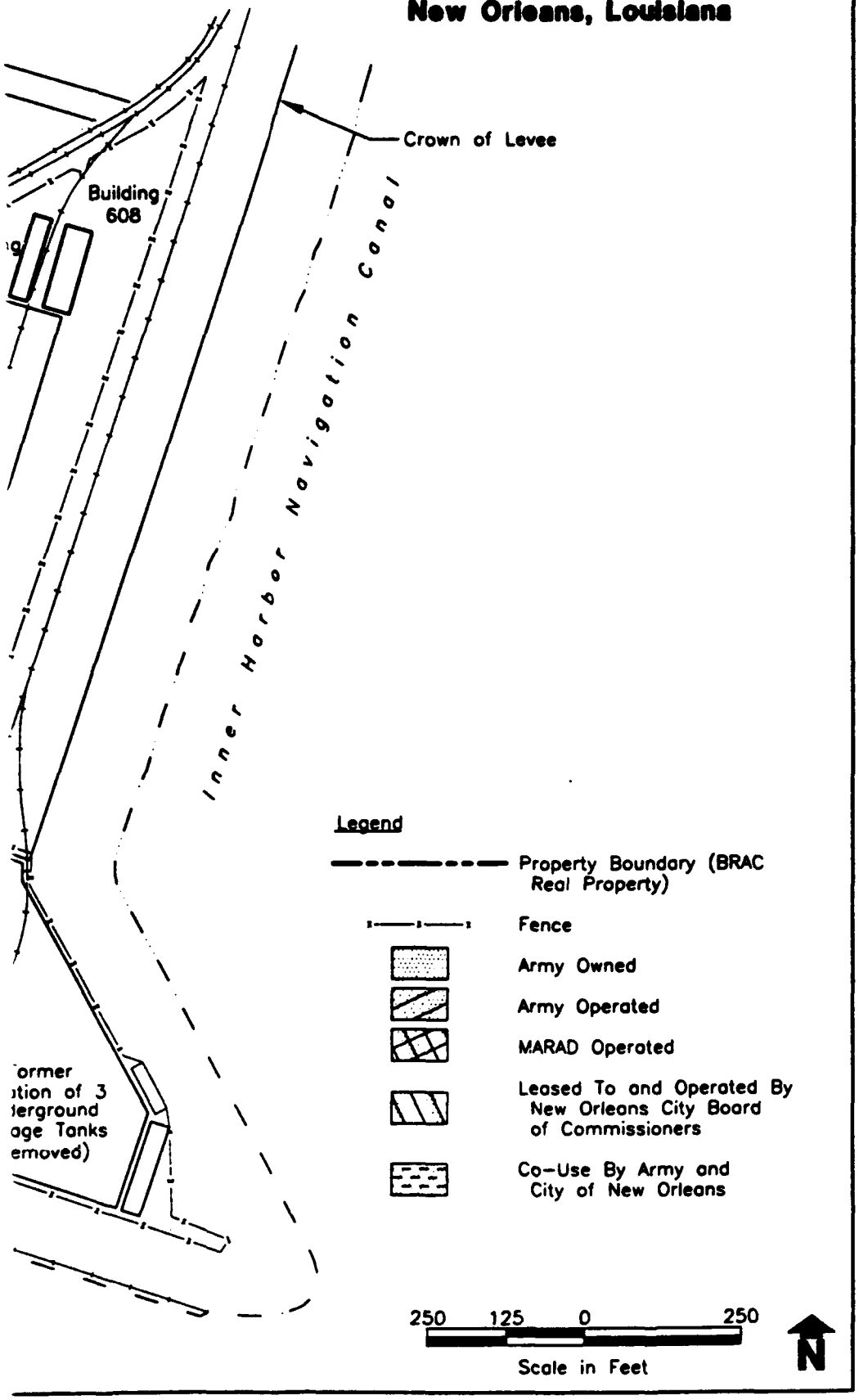
Figure 1.3-2
Site Plan of BRAC Real Property
New Orleans Military Ocean Terminal (NOMOT)
New Orleans, Louisiana



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2.0 SCOPE OF INVESTIGATION

The scope of the CERFA investigation includes:

- Review of previous environmental investigations, assessments, reports, etc.
- Review of applicable government regulatory records: federal, state, and local (where applicable and available).
- Interviews with representatives from the installation (or command responsible for the installation), other federal agencies, regulatory officials, and others.
- Review of maps and aerial photographs (where available).
- Inspection of adjacent property that potentially could contaminate the BRAC property.
- Detailed site inspection (the scope of these site inspections was determined principally by the review of previous investigations and assessments).
- Review of recorded chain of title documents.

These seven activities are specifically included within the statutory scope of CERFA. All seven activities were conducted during the CERFA investigation at NOMOT.

2.1 EXISTING INVESTIGATION DOCUMENTS

The duration and scope of activities at NOMOT has led to the preparation of a number rof environmental studies. The following documents were reviewed and used as primary sources in preparation of this report:

1. *Enhanced Preliminary Assessment, New Orleans Military Ocean Terminal, New Orleans, Louisiana, U.S. Army Toxic and Hazardous Materials Agency (USATHAMA), CETHA-BC-CR-89 354* , Roy F. Weston, Inc., December 1989.
2. *Draft Final Environmental Investigation and Alternatives Assessment, New Orleans Military Ocean Terminal, New Orleans, Louisiana, USATHAMA,* Engineering-Science, Inc., April 1992.
3. *Draft Final Environmental Investigation Report, New Orleans Military Ocean Terminal, New Orleans, Louisiana,* Engineering-Science, Inc., April 1992.

4. *Draft Final Environmental Investigation Report, New Orleans Military Ocean Terminal, New Orleans, Louisiana* (1991 Draft Final EI), prepared by Engineering-Science, Inc., dated November 1991.

5. *Underground Storage Tank Soil Investigation, Navy Support Activity, New Orleans, Louisiana*, W. D. Scott Group, Inc., 27 June 1990.

6. *Tier Two Emergency and Hazardous Chemical Inventory Form*, NOMOT, 26 February 1992.

7. *Spill Prevention, Control, and Contingency Plan*, prepared by Robert Swaine, Facility Engineer/Environmental Coordinator, NOMOT.

8. *Aerial Photographs*, obtained from Captain Gary Pease, U.S. Army Environmental Center (USAEC), on 10 October 1991.

9. *Finding of No Significant Impact for the Closure of New Orleans Military Ocean Terminal, New Orleans, Louisiana, under the Base Realignment and Closure Act*, signed by: Colonel John R. Moran, GS Chief of Staff MTMC, 23 August 1991.

2.2 *GOVERNMENT RECORDS REVIEW*

Federal Records

A review of federal records was conducted with Mr. James A. Harris, Jr., U.S. Environmental Protection Agency Region VI (EPA) in Dallas, Texas. Mr. Harris reviewed all regional files regarding NOMOT. The review identified no information on sites of contamination or areas requiring environmental evaluation not already covered by the documents listed in Section 2.1. Records provided by Mr. Harris indicate that a Site Inspection for NOMOT was completed in June 1993 with a determination that "no further remedial action is planned".

Neither NOMOT nor any immediately adjacent sites are listed on the EPA Region VI RCRA Violators List.

A search of the EPA's Emergency Response Notification System (ERNS) database over the period 30 January-2 February 1994 identified no reports of releases of oil or hazardous substances at NOMOT since the inception of the database in 1986. ERNS collects information on releases reported to Federal authorities.

State Records

A review of the Louisiana Department of Environmental Quality (LDEQ) records for NOMOT and adjacent properties was conducted on 21 September 1993.

There was no information in the file regarding hazardous waste manifests, permits, permit applications, inspection reports, enforcement actions, records of spills or remediation actions for NOMOT. The review did not identify any new areas of environmental concern on NOMOT or adjacent property.

Local Records

There are no local (city or parish) environmental regulatory agencies that govern NOMOT.

NRC Records

There is no evidence of any activities at NOMOT that required the issuance of a Nuclear Regulatory Commission (NRC) license.

AEHA Records

A records search conducted by the U.S. Army Environmental Hygiene Agency (AEHA) revealed no reports regarding the use of radioactive materials at NOMOT.

2.3 *INTERVIEWS*

Table 2.3-1 provides a summary for those individuals interviewed during the CERFA investigation.

2.4 *VISUAL INSPECTIONS*

Two ERM representatives were accompanied by Captain Gary Pease, USAEC CERFA Project Officer, and Mr. Robert Swaine of the NOMOT Environmental Engineering Department. All buildings on the site were entered and inspected. The walkover included inspection of the facility's perimeter. Areas of environmental concern described in previous investigations were specifically targeted for inspection. Observations indicating new concerns, such as areas of ground staining, were also noted.

An automobile and foot inspection of the surrounding property within one half mile was also conducted. When possible, observations of the neighboring property were made from the NOMOT property.

The facility was accessible through open gates in the surrounding levee wall. The berths appeared to be generally poorly maintained, although the structures appeared to be sound. The area under the berths was inaccessible because of the river conditions.

2.5 *TITLE DOCUMENTS*

ERM conducted a review of tract maps and transfer documents to identify the prior property owners of the NOMOT property at the time of its transfer to the Army. The purpose of this review was to collect additional information concerning the property's prior use and environmental condition at the time of its transfer to the Army. Based on this review, no additional information was collected. Previous ownership and the dates of transfer to the Army are indicated on Figure 5.2-1.

Table 2.3-1
List of Interviewees for NOMOT CERFA Assessment

Interview No.	Date	Name	Telephone	Organization/Position	Length of Service
I-1	9/21/94 to 9/24/94	Captain Gary Pease	(410) 671-1606	U.S. Army Environmental Center, CERFA Project Officer for NOMOT	3.5 Years
I-2	9/21/94 to 9/24/94	Robert Swaine	(504) 942-6195	NOMOT-Facility Engineering Division Chief of Division	4.5 Years
I-3	9/21/94 to 9/24/94	William Landweh	(504) 948-1124	NOMOT-Cargo Operations, Chief of Operations	2 Years
I-4	9/21/94 to 9/24/94	George Strunk	(504) 948-5228	NOMOT-Public Safety Division Project Officer	6 Years
I-5	9/21/94 to 9/24/94	Leslie Odom	(504) 361-2783	New Orleans Naval Support Activity, Public Works Department, Environmental Engineer	6 Years
I-6	9/21/94 to 9/24/94	Lisa Griffin	(504) 765-0223 (504) 765-0243	Louisiana Department of Environmental Quality (LDEQ) Office Coordinator	5 Years
I-7	9/21/94 to 9/24/94	Bob Lewis	(504) 589-2183	United States Maritime Administration (MARAD) at NOMOT, Manager	5 Years
I-8	9/21/94 to 9/24/94	Roy Burst	(504) 891-2912	New Orleans City Board of Commissioners at NOMOT, Manager	2 Years
I-9	9/21/94 to 9/24/94	James Harris	(214) 655-8302	EPA Region VI, Hazardous Waste Management Division, Superfund Site Strategy	4 Years

3.0 *PROPERTY BACKGROUND INFORMATION*

This section provides a description of the BRAC property and a discussion of its operational history (Section 3.1), and a description of any changes to environmental conditions since the last environmental assessment or investigation (Section 3.2).

3.1 *PROPERTY DESCRIPTION AND OPERATIONAL HISTORY*

NOMOT is located on the northwest intersection of the Mississippi River and the Inner Harbor Navigational Canal (Mississippi River-Gulf Outlet Canal), within the corporate limits of New Orleans, Louisiana.

The NOMOT site covers approximately 17.6 acres. NOMOT is essentially a long rectangle divided into southern and northern portions.

The southern portion of the site consists of 5 berths and is bordered by the Mississippi River. Berths 1, 2, 3, and 4 contain large transit sheds set atop a concrete slab. The slab rests on marine piles. Berth 5 is an exposed concrete dock slab. All berths include concrete loading docks on the northern and southern sides. The berths are built on timber and concrete pile foundations consisting of reinforced concrete and structural steel above the water level. The berths cover a total of approximately 499,711 square feet (11.47 acres). The transit sheds that cover Berths 1 through 4 have a total enclosed area of approximately 281,848 square feet.

The U.S. Army owns all of the berths; however, it operates only Berths 1, 2 and the eastern half of Berth 3. The western half of Berth 3 is leased to and operated by MARAD per an inter-service support agreement (ISSA). Berths 4 and 5 are leased to and operated by the City of New Orleans Board of Commissioners.

The northern portion of NOMOT has improved infrastructure but no buildings. A floodwall defines the northern border. The northeastern portion of the property is primarily maintained grass areas and concrete slabs on grade. An overhead ramp which extends to Berth 2 from Navy Building 603 is not part of the property. The northwestern portion of the property is primarily maintained grassy areas, dirt road and dirt parking areas. Two railroad tracks are located adjacent to the north side of the Berths. The tracks enter NOMOT from the west and terminate between Berths 2 and 3.

Berths 1, 2, and the eastern portion of 3 are used by the Army for warehousing and shipping. Although all operations have slowed in recent years, NOMOT has had the assignment of shipping materials through New Orleans since 1919. This activity was briefly interrupted to an uncertain extent from 1922 to 1942. Currently, a wide range of equipment and material is warehoused at and shipped through NOMOT, including:

- Military equipment,
- Privately-owned vehicles (POVs),
- Supplies for post exchanges (PXs),
- Ordnance, and
- Chemicals and compressed gases.

The equipment and type of materials handled have not changed significantly since WWII. With the exception of recent history, all five berths were used by the Army during most of the facility's life.

POVs are processed (gasoline and other fluids are removed) on property leased by NOMOT from the City of New Orleans, and subsequently stored and shipped through NOMOT.

At the time of the site visit, the northeastern portion of NOMOT was used primarily for truck parking, while loading and unloading materials at Berth 1 and 2. This area was also used for POV storage.

The western half of Berth 3 is used for storage of materials by MARAD. Ship maintenance parts were located throughout the MARAD portion of Berth 3. MARAD has operated out of Berth 3 for the last 2 years.

Berth 4 was the most active berth at the time of the site visit. It is extensively used for the loading and unloading of bulk rubber products. The Board of Commissioners has actively operated at NOMOT since 1919.

During the site visit Berth 5 was utilized for parking and occasional material staging. Diesel forklifts operated by workers in Berth 4 are fueled on Berth 5.

According to Mr. Swaine, no hazardous waste is currently generated, stored on or disposed of by the Army at NOMOT. He stated that the Army does use Berths 1, 2, and 3 to store hazardous chemicals/materials for future transport. The hazardous chemicals/materials included:

- Cleaners,

- Ethylene Glycol,
- Petroleum, Oils, and Lubricants (POL),
- Compressed gases,
- Solvents,
- Flammables, and
- Explosives

A specific area on the southwestern side of Berth 2 was posted as the hazardous chemical/material storage area.

Two temporary vertical storage tanks on the south side of Berth 2 are used by the ship maintenance contractors for temporary storage of ships' bilges. The waste bilge is disposed of off-site by a contractor.

Lubricants and surfactants are stored in the MARAD portion of Berth 3 for use on ships receiving emergency services away from NOMOT. MARAD does not generate hazardous waste as part of its operations. Greasy spots were observed on the floor in MARAD's portion of Berth 3.

Berths 4 and 5 are exclusively used by the Board of Commissioners to store materials being shipped through NOMOT. Fifty-five gallon drums of diesel fuel and lubricants were observed on the northeast side of Berth 4. These materials are used to service forklifts used on site. The Board of Commissioners does not generate any hazardous waste from its operations at Berths 4 and 5.

3.2 *CHANGES TO REAL PROPERTY ENVIRONMENTAL CONDITIONS SINCE ENHANCED PA INVESTIGATION*

Several changes to the conditions of the property at NOMOT since the Enhanced PA were documented during the CERFA site visit.

1. Three USTs located on the northeastern portion of the site were removed in 1992. According to Mr. Swaine, all contaminated soil was removed at that time.
2. A new 500-gallon AST is located on the north side of MARAD's portion of Berth 3. The AST, which has secondary containment, is owned and operated by MARAD and used to store diesel fuel.
3. Much of southern loading dock at Berth 4 was covered with spilled lubricants and hydraulic oils. It appeared that releases from the forklift vehicles were the cause. Similar staining was observed inside Berth 4 and on the dock on the north side of Berth 4. Numerous

stacks of rubber materials were observed on the concrete floor of Berth 4.

4. An area of staining, indicative of a petroleum-based material, was observed on the ground north of Berth 4.

4.0 *INVESTIGATION RESULTS*

This section describes the results of the CERFA investigation by identifying areas of environmental concern, both those previously identified in prior investigations and those uncovered as a result of the CERFA site visit. In addition, Section 4 identifies parcels in accordance with the parcel definitions contained in Section 1.2.

4.1 *PREVIOUSLY IDENTIFIED AREAS REQUIRING ENVIRONMENTAL EVALUATION (AREES)*

The size, operating history, general uniformity of development, and consistent use of hazardous or petroleum materials at NOMOT resulted in the designation of one CERFA Disqualified Parcel and one CERFA Parcel. This section describes the environmental conditions of Disqualified Parcel 1. The appropriate CERFA identifiers, which provide the basis for classification, are listed below beside the Parcel number. The numbering of this Parcel corresponds to the site map (Figure 5.1-1) and the accompanying map table.

1. Berths 1-4 [Parcel 1D-HS/PS/PR/A/L(P)]

Berths 1-4 have been used since Word War II for warehousing and shipping operations. The Enhanced PA reported that a variety of hazardous chemicals/materials were stored in the Berths including: munitions, compressed gases, corrosives, flammables, and oxidizers.

During the site visit, storage of hazardous materials or petroleum products was observed in Berths 1, 2, 3, and 4. Materials in Berth 1 included: multiple 55-gallon drums of lubricants, transmission oils, and ethylene glycol; and 5-gallon containers of sulfuric acid. The southwest corner of Berth 2 was actually designated as the hazardous and chemical storage area. Materials in this area included multiple 5-gallon containers of solvents, lubricating oils, cleaning compounds, and smaller quantities of various other materials. This area was also used to store compressed gases. Materials in Berth 3 included 5-gallon containers of petroleum lubricants and cleaning solutions. Materials observed in Berth 4 included two 55-gallon containers of diesel fuel, one 55-gallon container of lubricating oil, and several 5-gallon containers of transmission oils. No hazardous chemicals/materials were stored on Berth 5. According to Mr. Swaine, no hazardous waste is currently generated, stored on, or disposed of by the Army at NOMOT. All hazardous materials storage is for unused products.

ERM observed several stained areas in Berth 4, one stained area in Berth 3, and one stained area on Berth 5. The staining appeared to be related to petroleum products.

The Enhanced PA reported three USTs north of Berth 2. The USTs provided storage for diesel fuel and gasoline, which were used to refuel in-bound POVs. One of the USTs was leaking at the time of the Enhanced PA survey.

During the site visit, Mr. Swaine stated that the three USTs and the surrounding petroleum contaminated soil had been removed and properly disposed. He stated that the LDEQ had approved the UST closure operation.

The Enhanced PA reported stained soil adjacent to the railroad tracks north of the loading dock. During the site visit, two stained area along the railroad tracks on the north side of Berth 4 were observed. The staining appeared to be petroleum-based.

The Draft EI reported that testing for asbestos had been conducted at NOMOT. A total of 17 samples of suspect asbestos containing materials (ACM) were collected from Berths 2, 3, and 4. The suspect ACM tested included a common thermal insulation, ceiling tile, floor tile, firewall, and roof material. The common thermal insulation was determined to be non-ACM. Samples of ceiling tile and floor tile collected in Berth 2, 3, and 4 were determined to be ACM. Samples of the firewall and roof materials collected were determined to be non-ACM. Mr. Swaine stated that abatement of the confirmed ACM has not occurred. The floor tile appeared to be non-friable, while the ceiling tile appeared to be friable.

The Draft EI did not report that any samples were collected from Berth 1. However, the building was constructed prior to 1985 and is therefore presumed to contain ACM. Floor tile and ceiling tile in the office of Berth 1 appeared similar to the ACM ceiling tile and floor tile in the other Berths.

All transformers observed during the site visit were operating. Under CERFA guidelines, in-use transformers are not a concern.

Testing for the presence of lead-based paint (LBP) has not been conducted at NOMOT. All buildings at NOMOT were constructed prior to 1978, indicating the possible presence of LBP.

4.2 *ADDITIONAL AREAS IDENTIFIED*

During the site visit, a 500-gallon AST between the flood wall and the north loading dock of Berth 3 was observed. The AST was secured inside a concrete secondary containment structure. Slight staining was observed inside the secondary containment system; however, no staining was observed on the ground outside of the containment system. Mr. Swaine stated that the tank is used to store diesel fuel for MARAD operations and that it has been in place for one year.

4.3 *ADJACENT/SURROUNDING PROPERTIES*

The Enhanced PA and the Draft EI reported a UST located adjacent to the western side of Building 623, on the adjacent Navy property to the east. The Draft EI concluded that the UST had leaked and that an area of volatile organic contamination extended from the UST to the east, away from NOMOT. The potential to impact NOMOT is considered low.

During the CERFA site visit, two ASTs on the Navy Property adjacent to Building 602, just north of NOMOT were observed. Ms. Leslie Odom stated that the two ASTs had replaced two USTs, also located in this area. She stated that the USTs and any contaminated soil from the USTs were removed a number of years ago. No staining or leaking around the ASTs was visible during the site visit. The potential to impact NOMOT is considered low.

4.4 *RELATED ENVIRONMENTAL, HAZARD, AND SAFETY ISSUES*

Military installations frequently contain issues which the U.S. Army Environmental Center (USAEC) believes fall outside of the provisions of CERFA. For example, while a release of lead-based paint onto the ground may be a CERCLA concern, the application of lead-based paint to a building surface is generally not. However, lead-based paint applied to buildings may represent a safety hazard to young children. Similarly, other substances or materials commonsly applied to or found in buildings (for example, radon and asbestos) may not be explicitly regulated under CERCLA, but may require a notice to potential transferees and lessees that they exist.

USAEC has sought to balance the statutory requirements of CERFA with the law's intent to identify uncontaminated property to the public which can be expeditiously reused. Notice has been provided for those parcels which appear to be uncontaminated under the definition provided in CERFA, but which may contain environmental, hazard, or safety issues.

Buildings which contain asbestos-containing materials, lead-based paint, or naturally occurring radon fall into this category and are identified as "CERFA Qualified Parcels" in this CERFA report. Parcels which contain stored (not in use) equipment containing 50 parts per million (ppm) or more of polychlorinated biphenyl (PCB) oil, low level radionuclide-containing equipment such as dials and weapon site posts, and unexploded ordnance are also designated "CERFA Qualified Parcels".

In those cases, however, where for example, asbestos or PCBs have been disposed in the environment, the parcel has been identified as "CERFA Disqualified". In this example, the designation indicates that a CERCLA hazard may exist at this location.

Related environmental, hazard, and safety issues (CERFA Qualifiers), specifically ACM and LBP, are present or suspected to be present at NOMOT. ACM testing has been conducted at NOMOT. LBP is presumed to be present based on the age of the facility. These concerns are addressed in Section 4.1 because the areas in which they are present fall within the larger CERFA Disqualified Parcel. A listing of structures at NOMOT that contain CERFA Qualifiers may be found in Table 4.4-1.

4.5 *CERFA EXCLUDED PROPERTY*

None of the NOMOT property is considered Excluded from the CERFA process.

Table 4.4-1
Buildings with CERFA Qualifiers
New Orleans Military Ocean Terminal (NOMOT)
New Orleans, Louisiana

Buildings	
Berth 1	A(P)/L(P)
Berth 2	A/L(P)
Berth 3	A/L(P)
Berth 4	A/L(P)

A	Asbestos-containing material
A(P)	Asbestos-containing material (possible)
L	Lead-based Paint
L(P)	Lead-based paint (possible)
R	Radon

5.0 SITE PARCELIZATION

After concluding the review of investigation documents, regulatory records, personnel interviews and visual inspections, ERM identified parcels on the installation as CERFA Parcel, CERFA Qualified Parcels, CERFA Disqualified Parcels, or CERFA Excluded Parcels in accordance with the definitions in Section 1.2. The parcels are delineated on a map of the BRAC portion of the installation using a one-acre square grid for boundary definition.

The Army chose a one-acre grid system to aid in the presentation of data gathered during the CERFA report investigation, and to facilitate use of the document by reuse groups and others. The one-acre grid provided a consistent method to report and locate environmental or other concerns. In the many cases where the concerns are much smaller than one acre, the grid system simplifies the depiction of the concern. Accordingly, the areal extent of many small areas of concern, such as UST sites, are liberally depicted in the CERFA report.

Additionally, the one-acre grid size was chosen as a generally redevelopable parcel size for either industrial or residential uses. However, the grid does not drive reuse nor restrict it. Reuse decisions should be made irrespective of the grid.

The entire one-acre grid square is colored or shaded to indicate the applicable parcel category based on the history of storage or release for any portion of that square. Parcels are labeled according to a system outlined in Section 1.2 of this report to indicate the applicable parcel category and the contaminating circumstances. Parcel labels are connected to the respective parcel boundaries by a line or are located within the parcel boundaries.

Where CERFA Disqualified Parcels and CERFA Qualified Parcels have coincided, the overlapped area has been designated CERFA Disqualified. Labels for any such overlapped parcels also indicate the presence of the qualifying hazards. CERFA Excluded Parcels have been excluded from this investigation of contaminant locations and therefore have no overlapping CERFA Disqualified Parcels or CERFA Qualified Parcels. Structures within CERFA Disqualified Parcels that contain qualifying safety hazards are designated with the applicable qualifying label, where map scale permits this level of detail.

ERM's investigation and subsequent parcelization of the BRAC property at NOMOT determined that 2.4 acres of the facility falls within the CERFA

Parcel category. None of the facility is categorized as CERFA Qualified Parcels. 15.2 acres constitute the CERFA Disqualified portion of the installation. None of the property is designated CERFA Excluded.

In determining the applicable parcel categories for the installation property, ERM observed the following guidance provided by the USAEC for specific circumstances:

- Buildings constructed prior to 1978 are assumed to contain lead-based paint. A similar assumption is made for asbestos in buildings constructed prior to 1985.
- Storage of petroleum products, petroleum derivatives and CERCLA regulated hazardous substances will prevent an area from becoming a CERFA Parcel as long as that storage is for one year or greater. The quantity of substances stored is not relevant to determining the applicable parcel category. However, if the operation requiring such substances is in the immediate area, and the storage is in limited quantities for immediate use, the area is not precluded from being a CERFA Parcel.
- Non-leaking equipment containing less than 50 ppm PCBs does not preclude an area from becoming a CERFA Parcel. Non-leaking, out-of-service equipment with greater than 50 ppm PCBs will place an area in the CERFA Qualified Parcel category. An area is designated CERFA Disqualified if there is a known release containing greater than 50 ppm PCBs.
- Areas where there are transport systems or process equipment which handle hazardous material or petroleum products and upon which there have been no release, storage, or disposal are categorized as CERFA Parcels.
- Ordnance disposal locations are designated CERFA Disqualified. This does not include ordnance impact areas which are designated CERFA Qualified Parcels.
- Routine pesticide and herbicide application in accordance with manufacturer's directions and chlorofluorocarbons and halon in operational systems do not preclude an area from becoming a CERFA Parcel.
- Coal storage piles and railroad tracks do not be themselves preclude an area from becoming a CERFA Parcel.

5.1 *CERFA CATEGORY AND DESIGNATION MAP*

Table 5-1 and Figure 5.1-1 identify the breakdown of the NOMOT property according to the criteria for parcel identification under CERFA.

5.2 *CERFA TRACT MAP*

The property boundaries and all property transfers including prior ownership information is shown in Figure 5.2-1.

5.3 *CERFA PARCEL DESIGNATORS*

Figure 5.3-1 summarizes the breakdown of the NOMOT property according to the criteria for parcel identification under CERFA.

Table 5.1-1
13th and 14th Medium Port Command
(NOMOT)
New Orleans, Louisiana

PARCEL NUMBER/ SIZE	LOCATION	CATEGORY	BASIS	SOURCE OF EVIDENCE	REMEDIATION
1D - HS/PS/PR/A/ L(P) (15.2 acres)	Area north of Berth 2 Coordinates: 11, 4	Disqualified	3 USTs and petroleum contaminated soil	Enhanced PA (1989)	USTs and contaminated soil removed 1992.
	Area north of Berth 4 Coordinates: 6, 5	Disqualified	Stained soil, petroleum release (P)	9/93 Site visit	
	Berths 1, 2, 3 and 4 Coordinates: 8, 4	Disqualified	Storage of hazardous materials	Enhanced PA (1989) 9/93 Site visit	
		Qualified	Asbestos	Draft EI (1992) 9/93 Site visit	
			Lead paint (P)	Draft EI (1992) 9/93 Site visit	
	Berths 3, 4 and 5 Coordinates: 6, 4	Disqualified	Stained soil, petroleum release (P)	9/93 Site visit	
	500 gallon AST Coordinates: 8, 5	Disqualified	500 gallon AST containing diesel fuel	9/93 Site visit	
2P (2.4 acres)	Area north of Berth 5 and a section of Berth 5 Coordinates: 4, 5	CERFA Parcel	No issues		

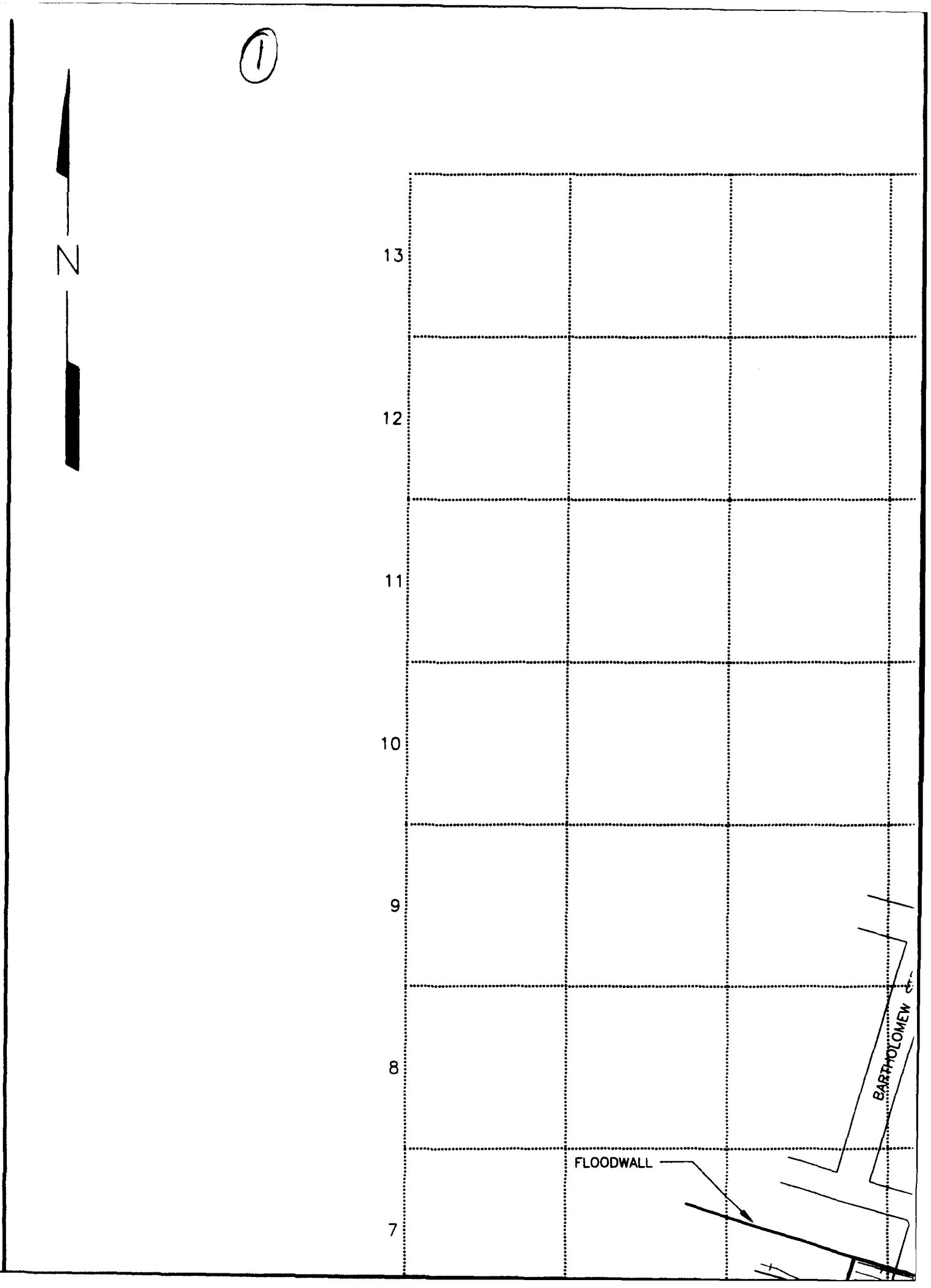
Parcel Category
D = CERFA Disqualified Parcel
Q = CERFA Qualified Parcel
E = CERFA Excluded Parcel
P = CERFA Parcel

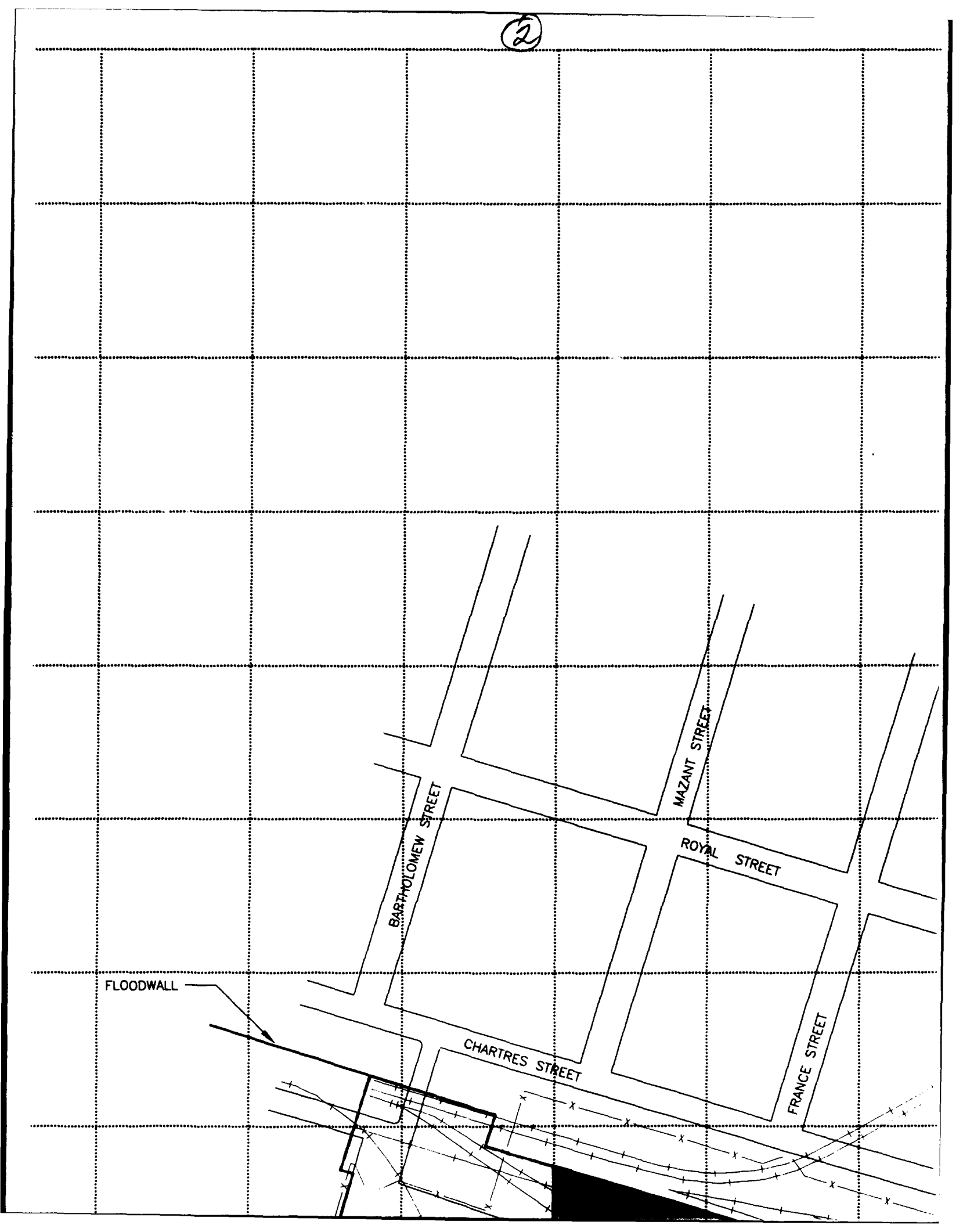
(P) = Possible

Disqualified Designations
PS = Petroleum Storage
PR = Petroleum Release/Disposal
HS = Hazardous Materials Storage
HR = Hazardous Materials Release/Disposal

Qualified Designations
A = Asbestos
L = Lead-Based Paint
P = PCBs (Polychlorinated biphenyls)
R = Radon
X = UXO (unexploded ordnance)
RD = Radionuclides

(1)

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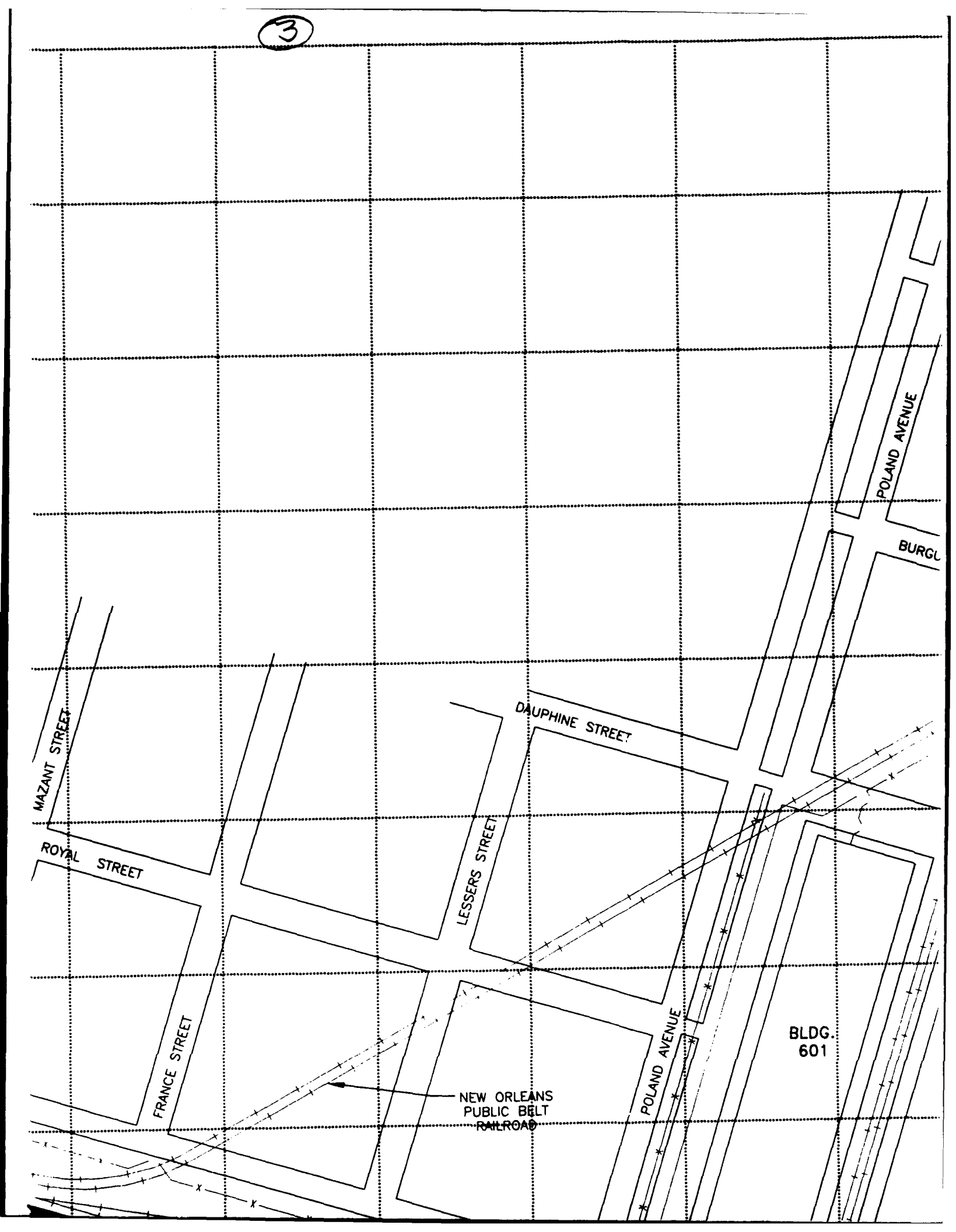
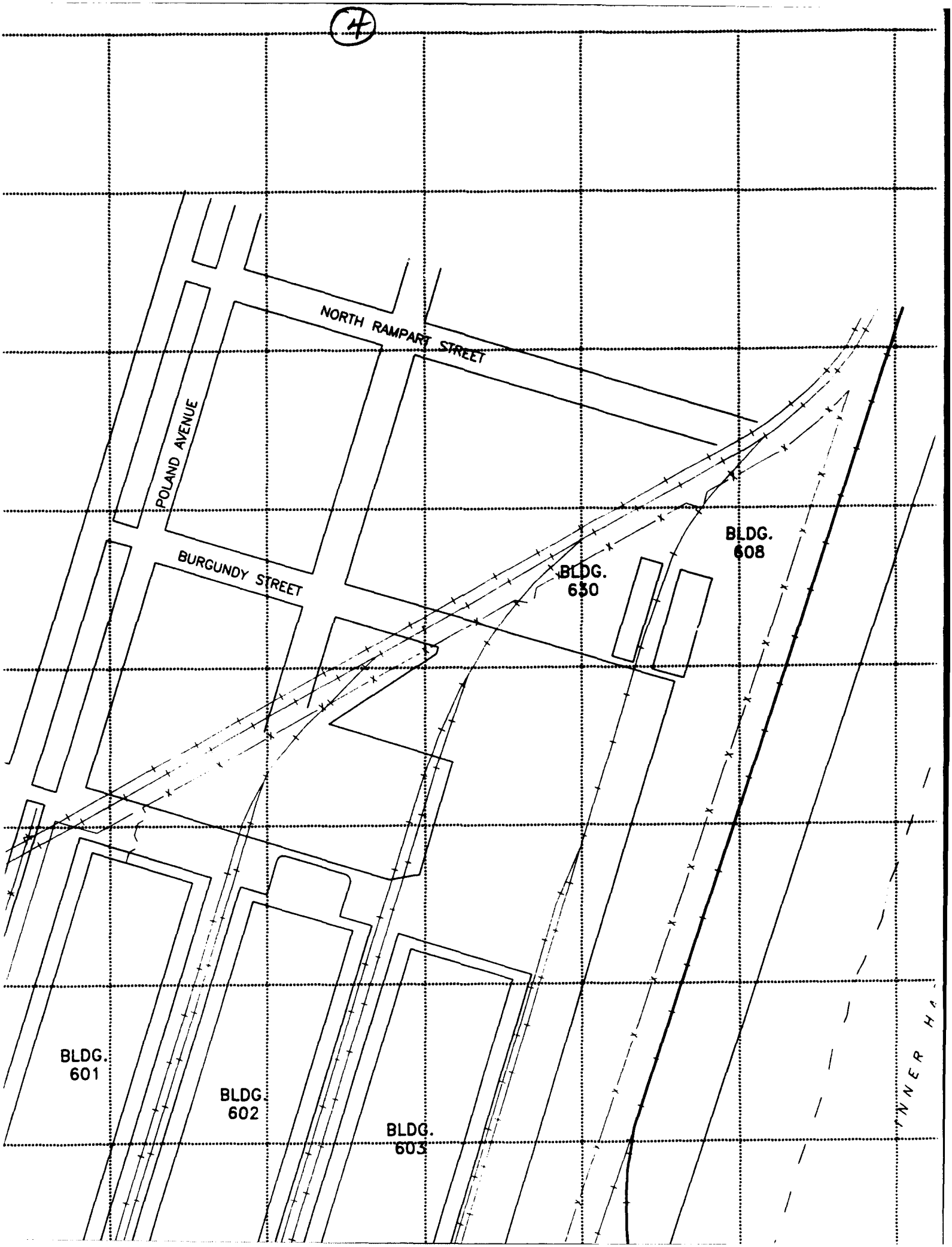
BARTHOLOMEW STREET
ROYAL STREET
FLOODWALL
CHARTRES STREET
FRANCE STREET


3
POLAND AVENUE
BURGU
DAUPHINE STREET
MAZANT STREET
ROYAL STREET
LESSERS STREET
FRANCE STREET
POLAND AVENUE
BLDG.
601
NEW ORLEANS
PUBLIC BELT
RAILROAD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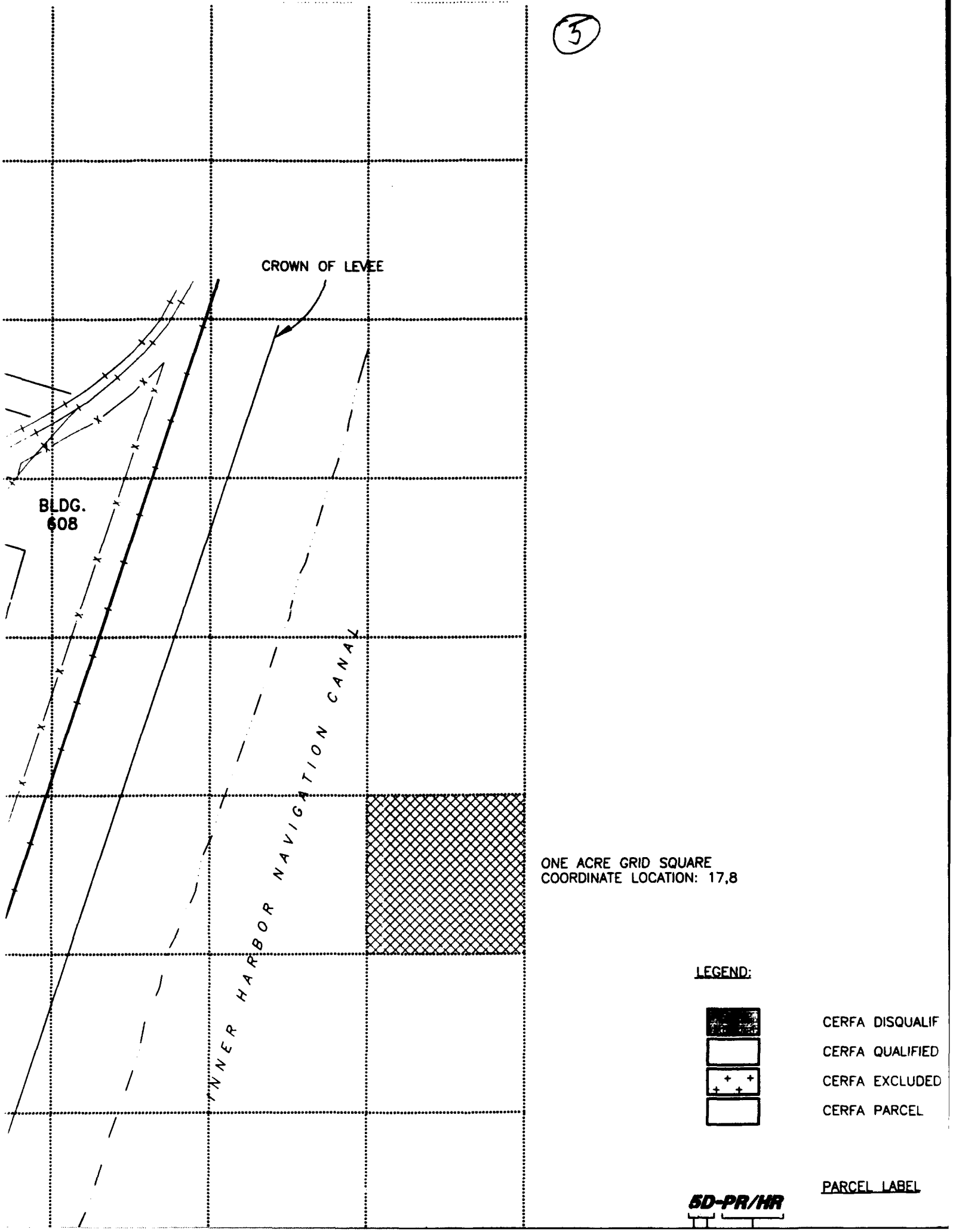
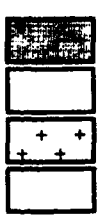
POLAND AVENUE
BURGUNDY STREET
BLDG. 608
BLDG. 630
BLDG. 601
BLDG. 602
BLDG. 603


3
CROWN OF LEVEE
BLDG.
608
INNER HARBOR NAVIGATION CANAL
ONE ACRE GRID SQUARE
COORDINATE LOCATION: 17,8
LEGEND:
CERFA DISQUALIF
CERFA QUALIFIED
CERFA EXCLUDED
CERFA PARCEL
PARCEL LABEL
5D-PR/HR

ONE ACRE GRID SQUARE
COORDINATE LOCATION: 17,8

LEGEND:



CERFA DISQUALIFIED

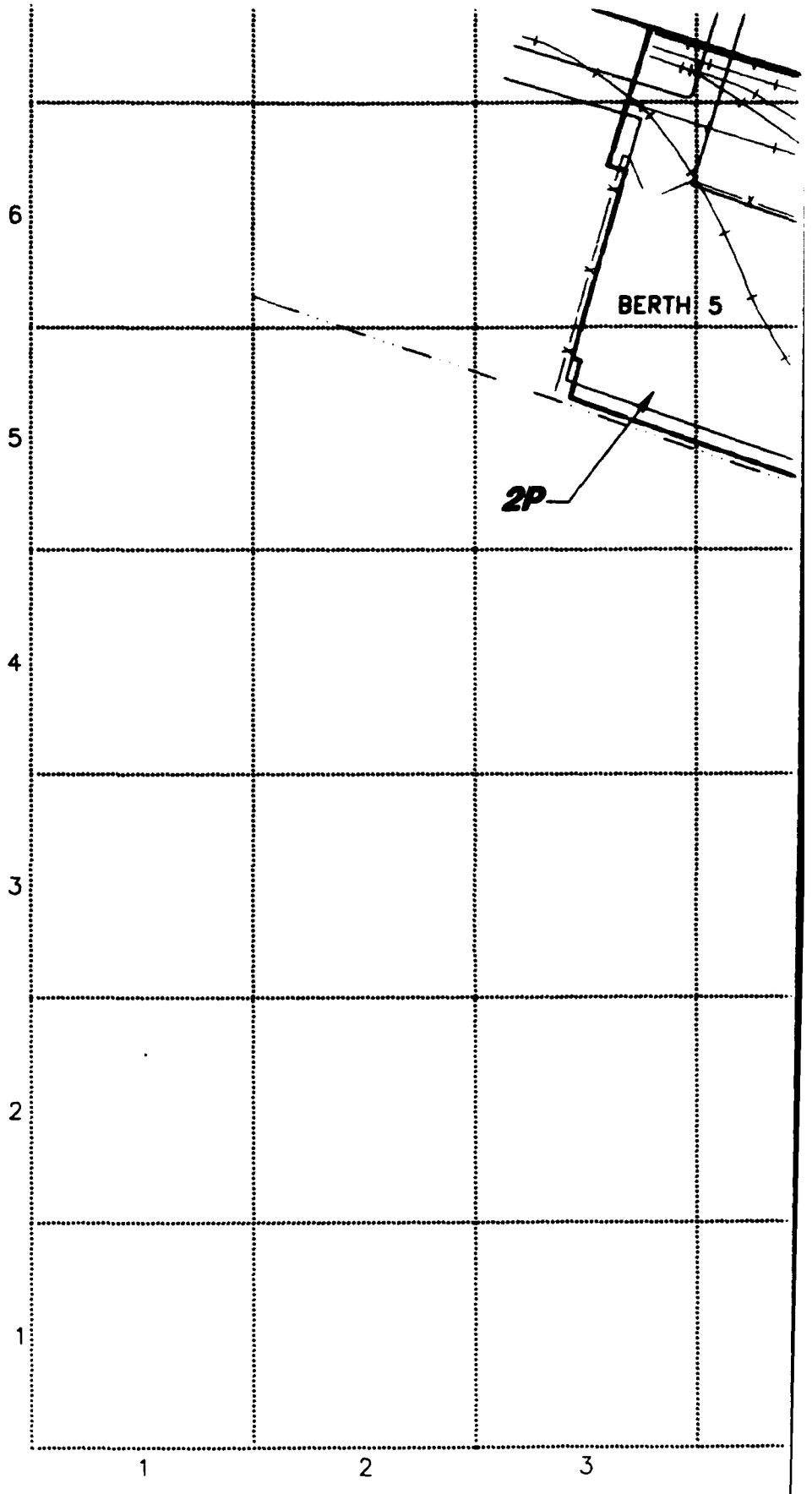
CERFA QUALIFIED

CERFA EXCLUDED

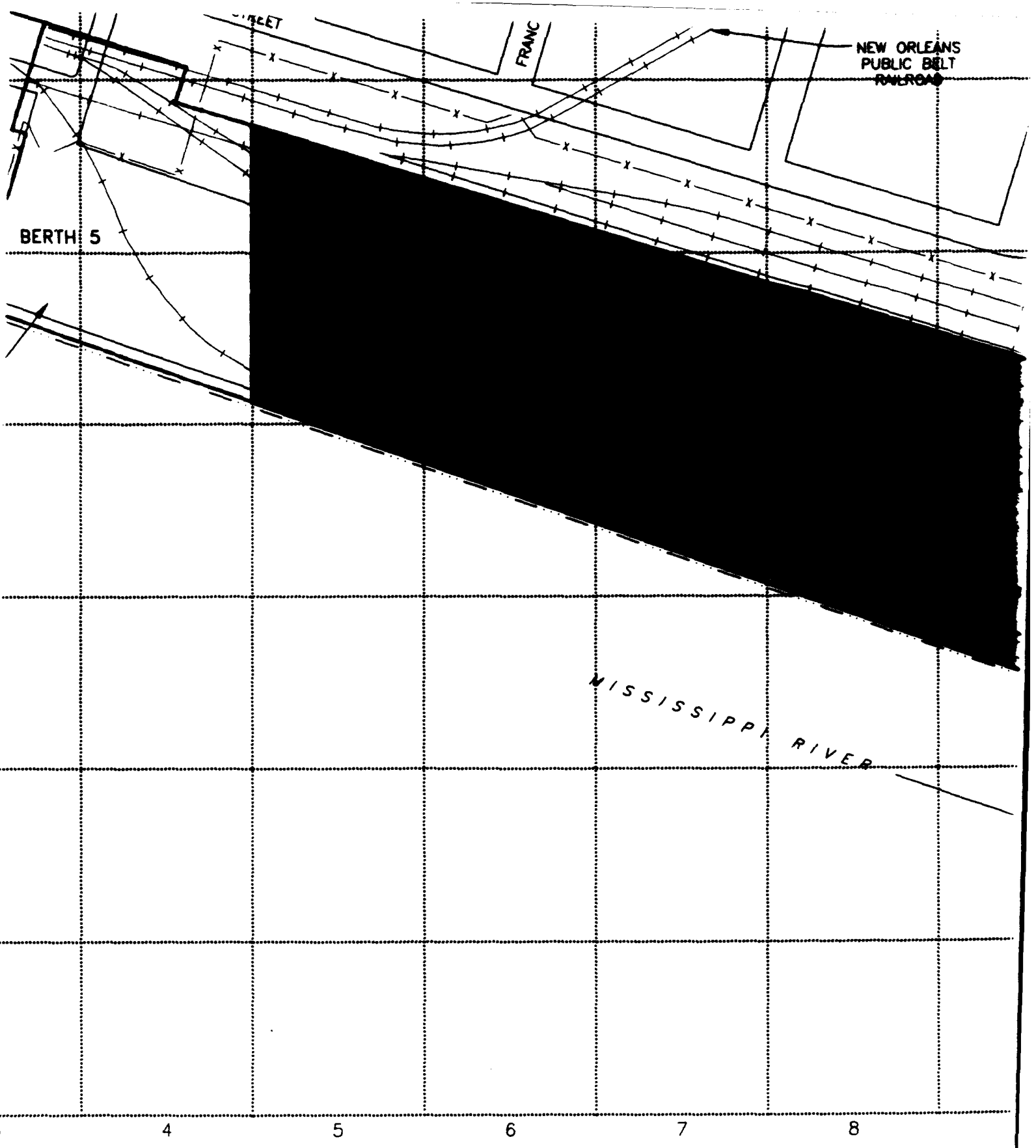
CERFA PARCEL

PARCEL LABEL

5D-PR/HR



NO.	DATE	APPR.	REVISION	NO.	DATE



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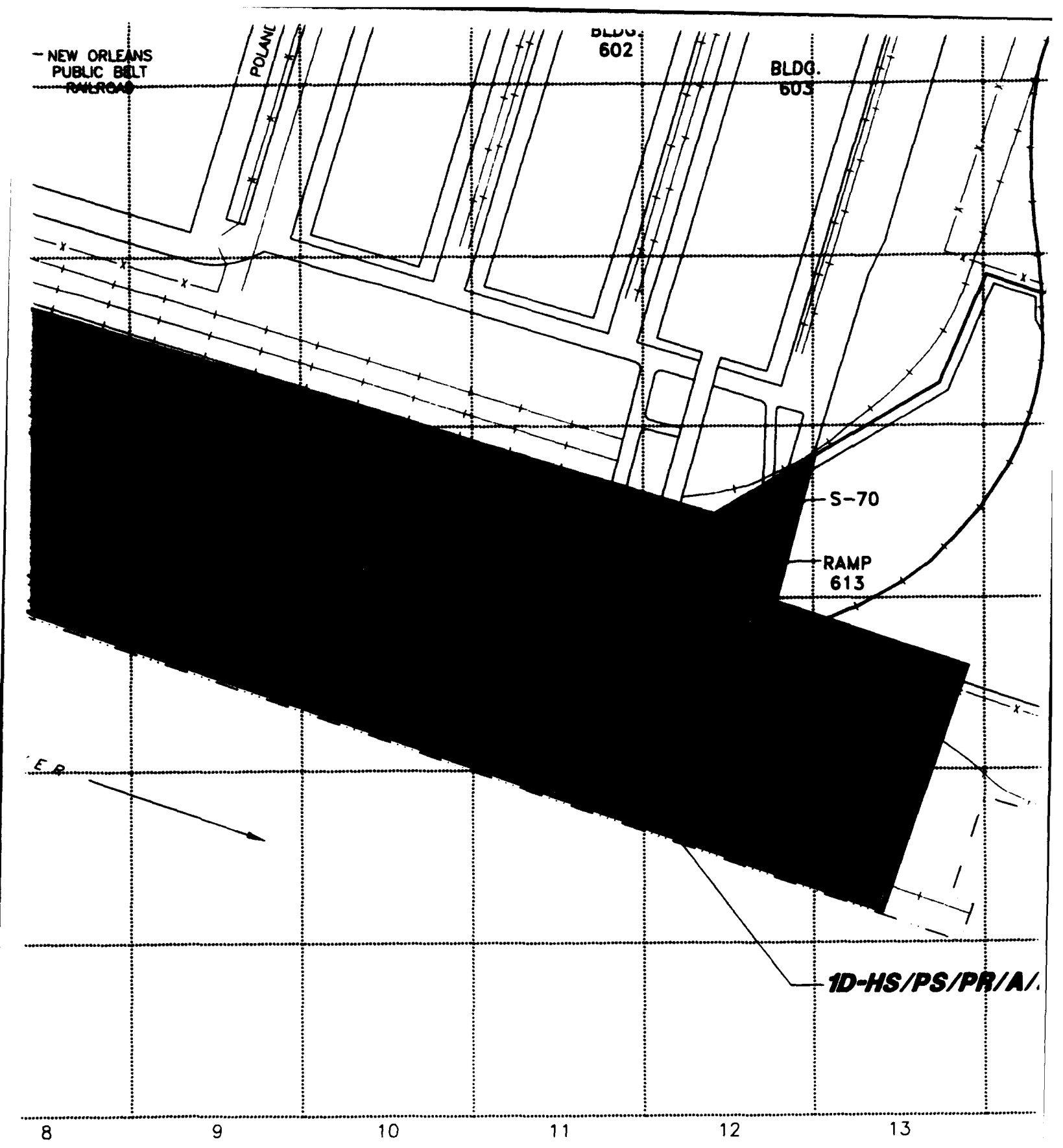
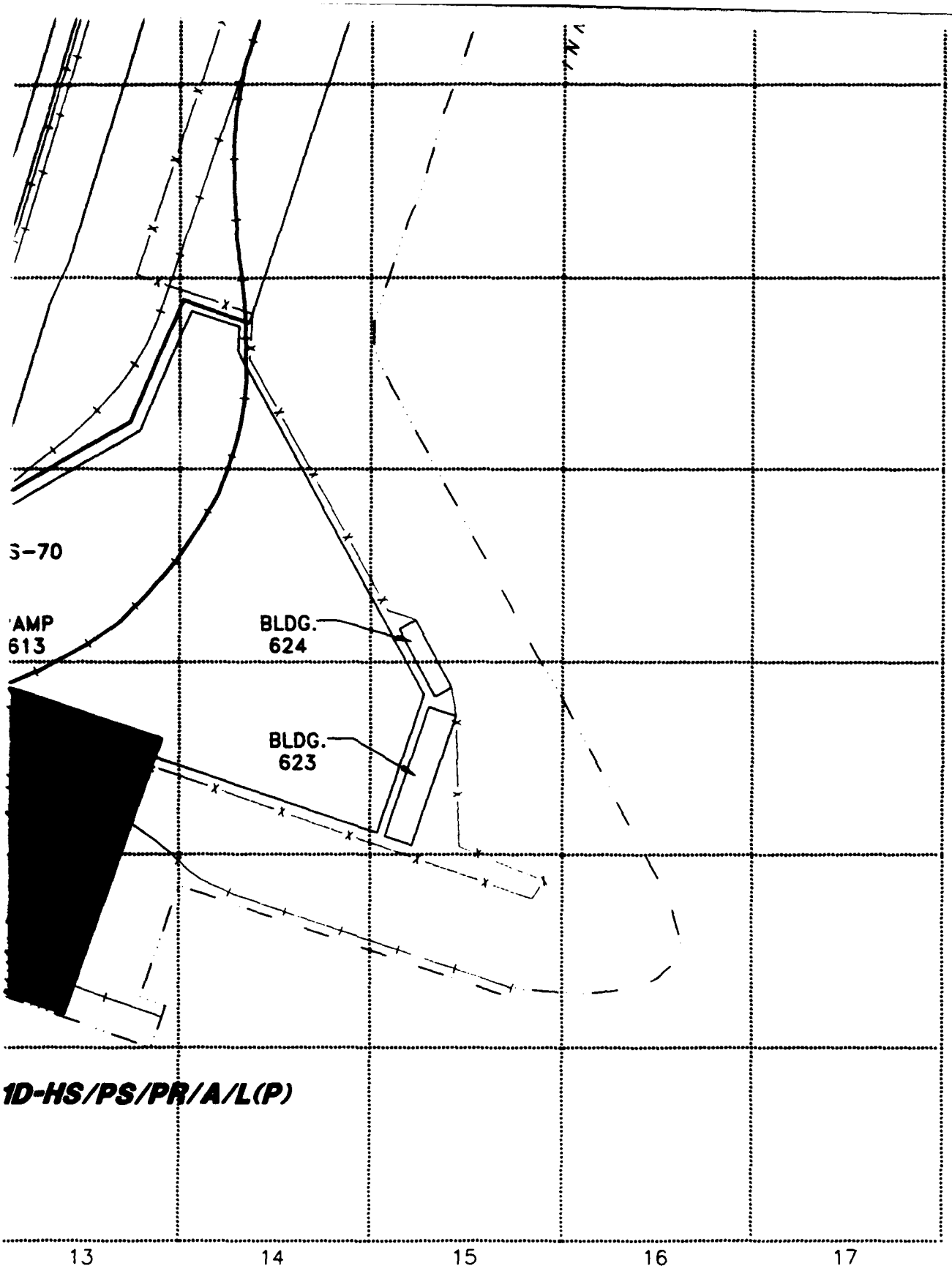


9

New Orleans Military Ocean Terminal (NOMOT)



10

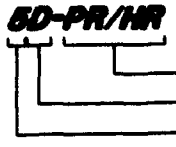
	CHECKED	DATE
	DESIGN ENGINEER	

CEQA Category

CERFA EXCLUDED

CERFA PARCEL

PARCEL LABEL



PARCEL DESIGNATION
PARCEL CATEGORY
PARCEL NUMBER AS NOTED ON DRAWING AND TABLE

PARCEL CATEGORY

D = CERFA DISQUALIFIED PARCEL
Q = CERFA QUALIFIED PARCEL
E = CERFA EXCLUDED PARCEL
P = CERFA PARCEL

DISQUALIFIED DESIGNATIONS

PS = PETROLEUM STORAGE
PR = PETROLEUM RELEASE/DISPOSAL
HS = HAZARDOUS MATERIALS STORAGE
HR = HAZARDOUS MATERIALS RELEASE/DISPOSAL

QUALIFIED DESIGNATIONS

A = ASBESTOS
L = LEAD-BASED PAINT
P = PCBS (POLYCHLORINATED BIPHENYLS)
R = RADON
X = UXO (UNEXPLODED ORDNANCE)
RD = RADIONUCLIDE

(P) POSSIBLE DISQUALIFIER/QUALIFIER

NON-LEAKING UST OR AST (FORMER OR ACTIVE)

LEAKING UST OR AST (FORMER OR ACTIVE)

RELEASE OR DISPOSAL OF PETROLEUM OR HAZARDOUS MATERIALS

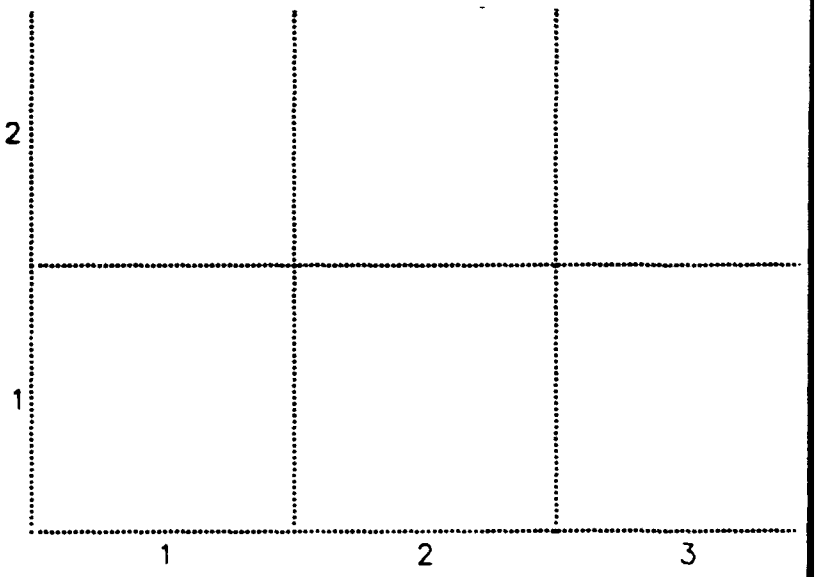
BUILDING WITH CERFA QUALIFIER(S) IN A DISQUALIFIED PARCEL

Scale in Feet

DRAWING NO.

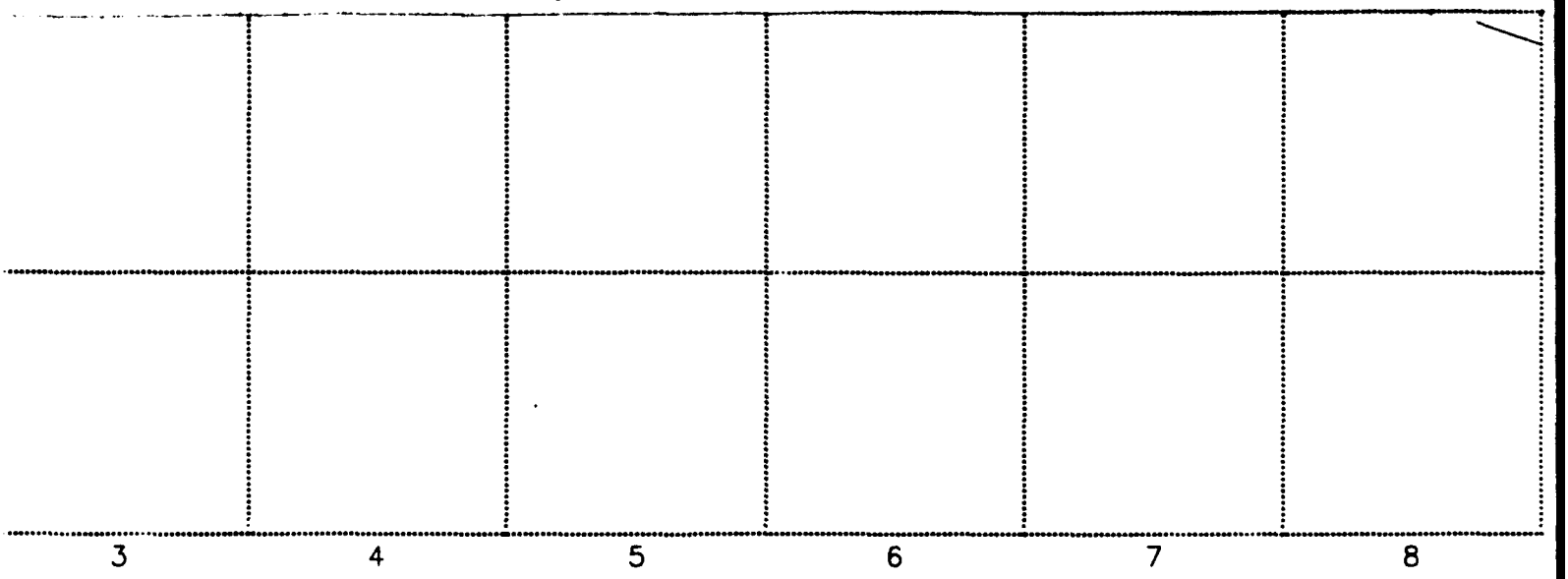
Figure 5.1-1

CERFA Category and Designation Map



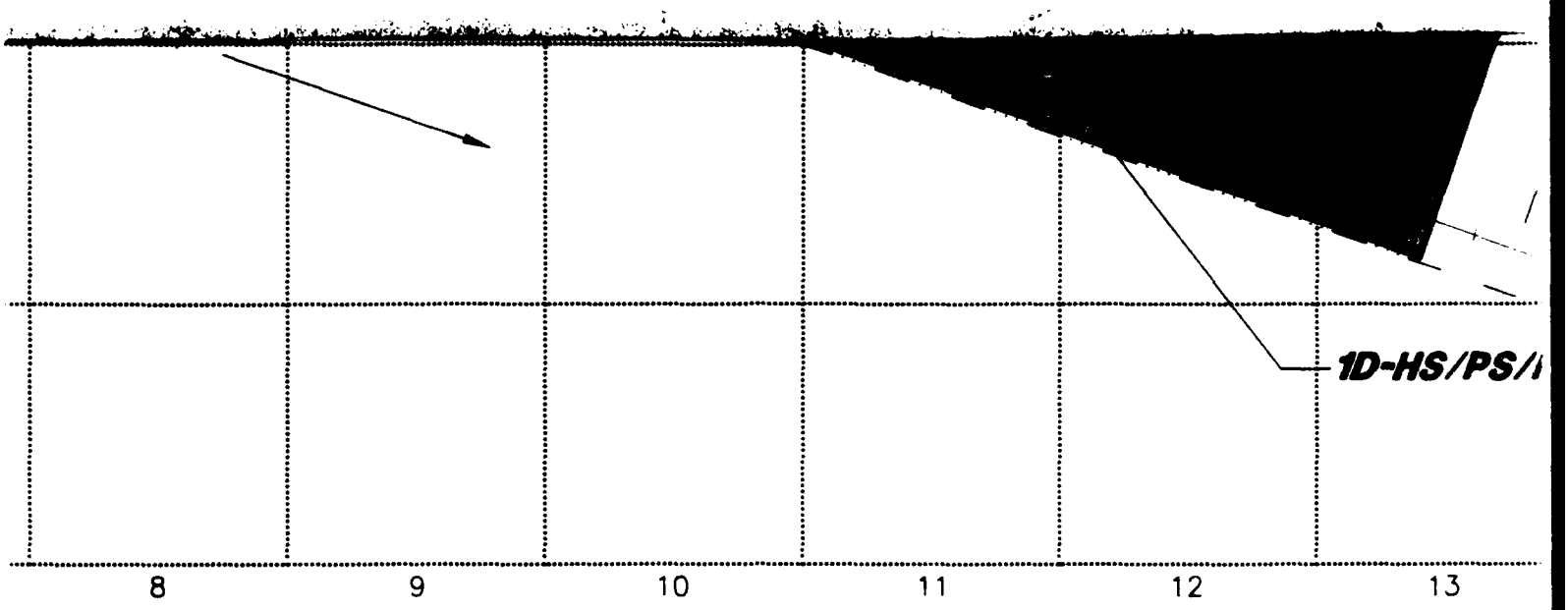
NO.	DATE	APPR.	REVISION	NO.

12



	NO.	DATE	APPR.	REVISION	
					N

13



New Orleans Military Ocean Terminal (NOMOT)

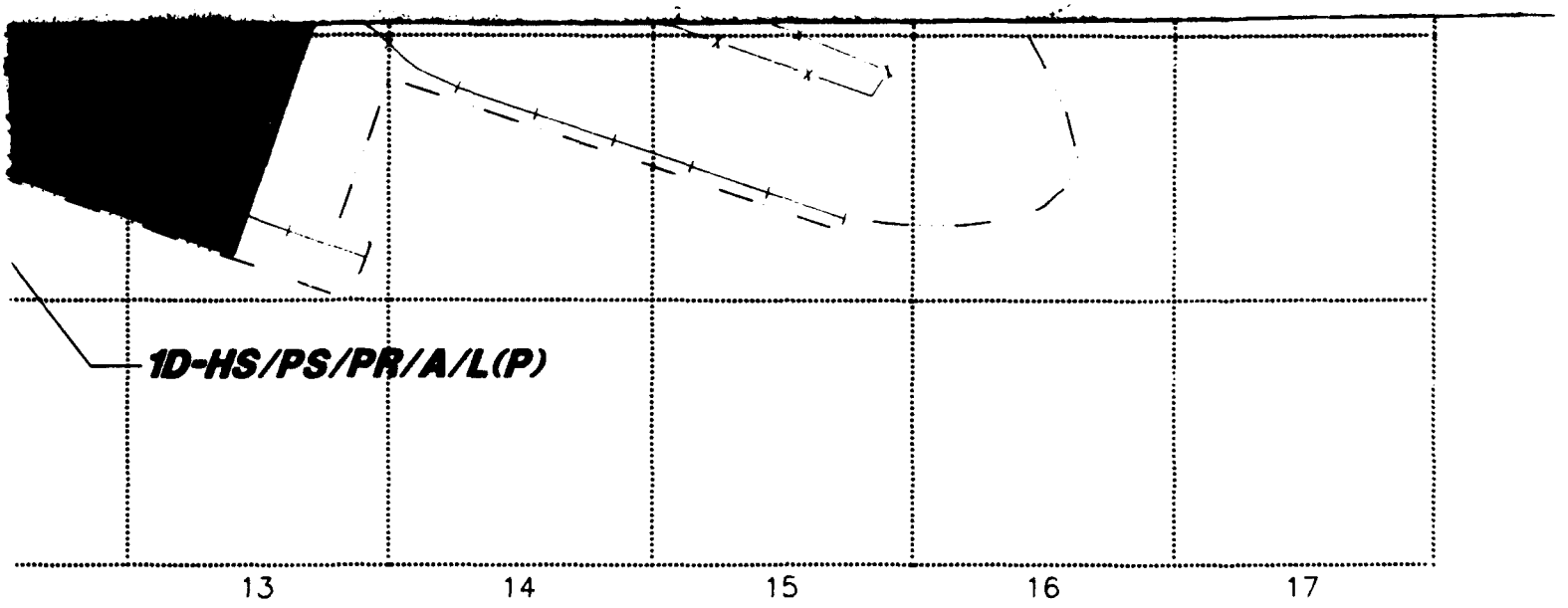
New Orleans **Louisiana**

Environmental Resources Management, inc.

Exton, Pennsylvania 19341 (215) 524-3500

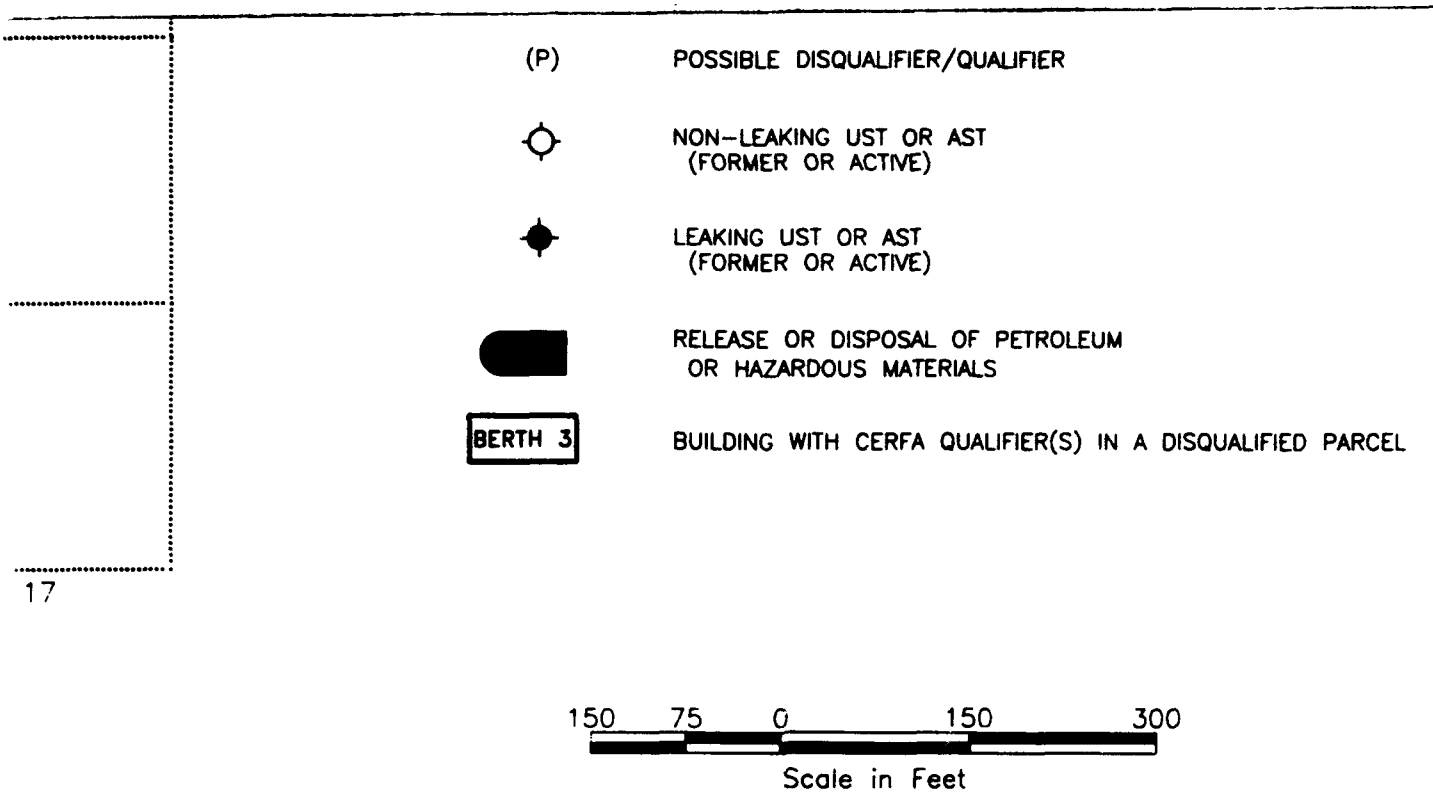
ERM

14



)MOT)		CHECKED	DATE	CERFA Cat	
Louisiana		DESIGN ENGINEER			
		PROJECT ENGINEER			
		PROJECT MANAGER			
ERM		APPROVED		DRAWN: M.K. Bond/CMP	DATE
		APPROVED		SCALE: 1" = 150'	W O

15



CERFA Category and Designation Map

DRAWING NO.

Figure 5.1-1

REV. NO.

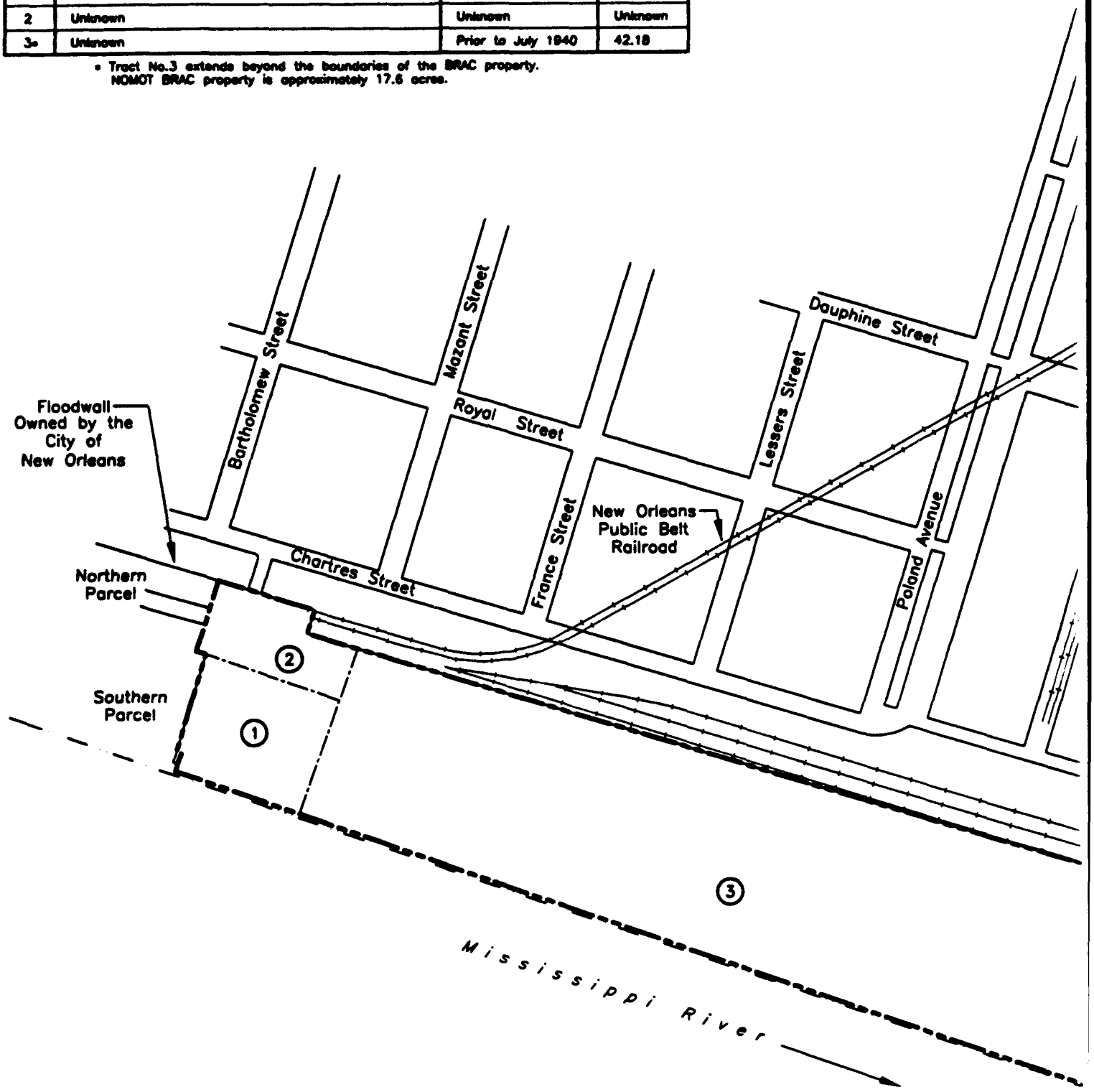
nd/CMP	DATE 10.25.93/04.06.94	CLIENT APPROVAL	
50'	W.O. NO. PM307.70.01/A301-1	ISSUED FOR DATE	SHEET 1 OF 1

16

New Orleans Military Ocean Terminal (NOMOT) Previous Owners

Tract No.	Name of Previous Owner (Transferrers)	Date of Transfer	Acreage Fee
1	Board of Commissioners of the Port of New Orleans	Unknown	0.97
2	Unknown	Unknown	Unknown
3*	Unknown	Prior to July 1940	42.18

* Tract No.3 extends beyond the boundaries of the BRAC property. NOMOT BRAC property is approximately 17.6 acres.



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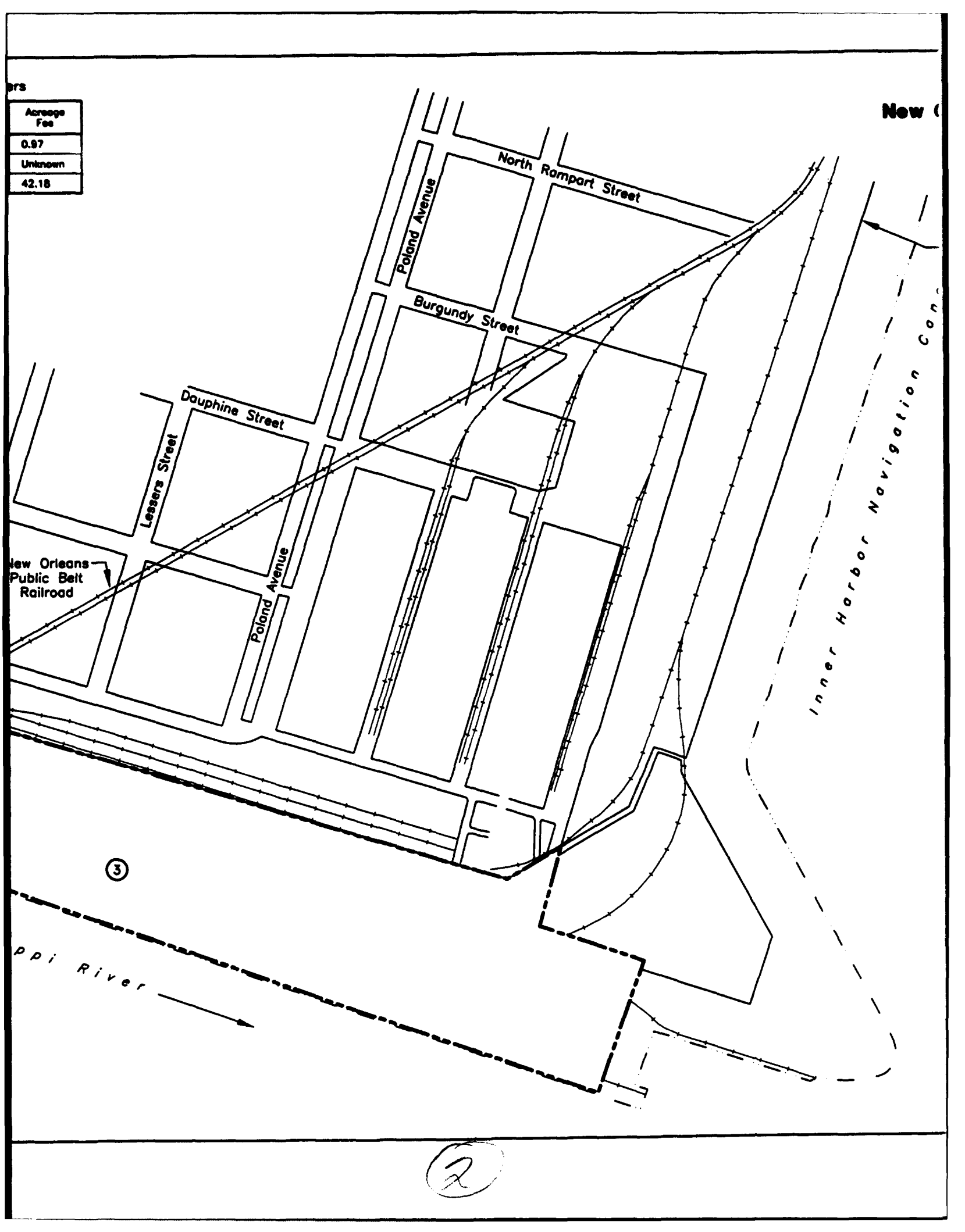
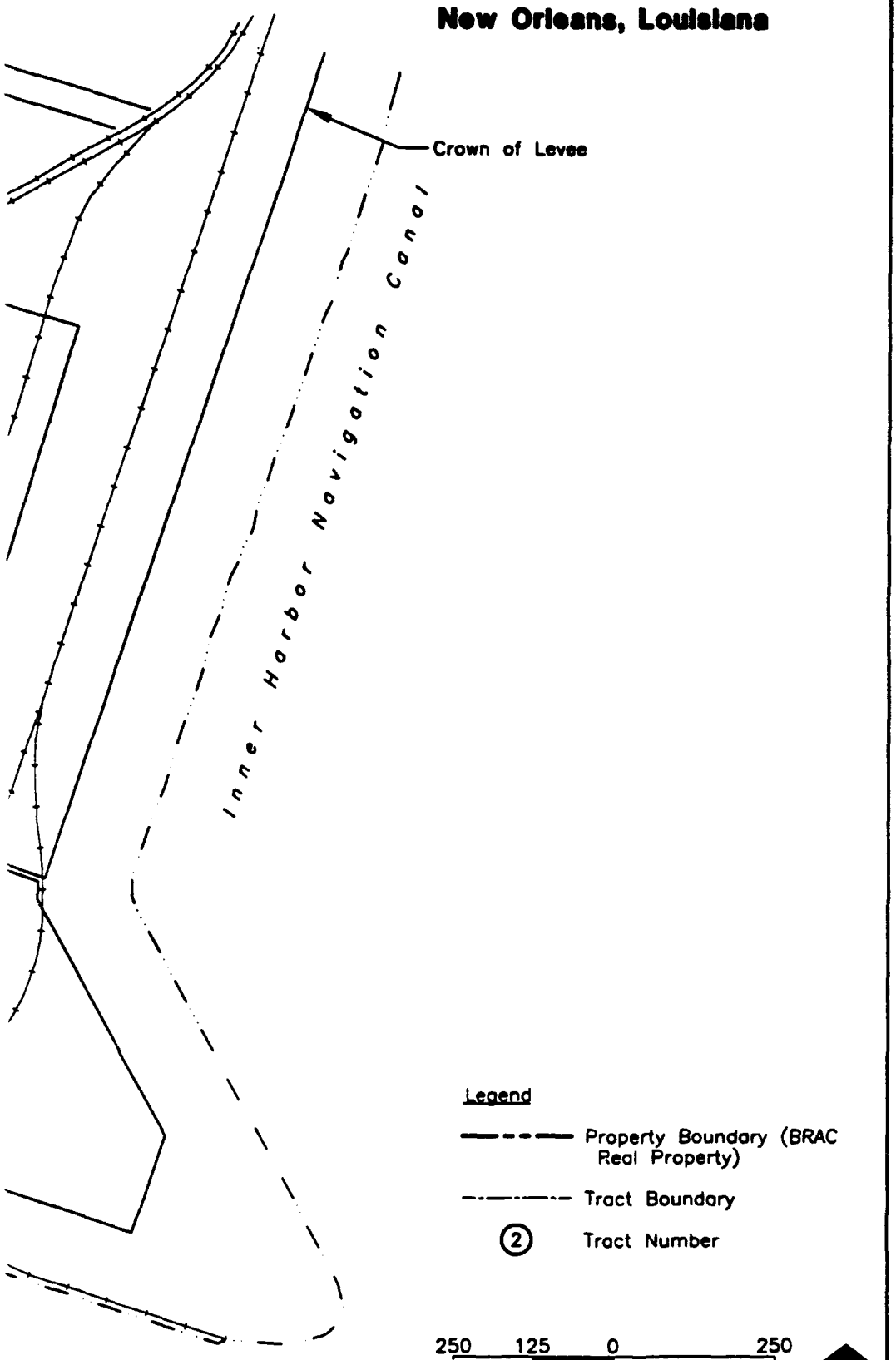
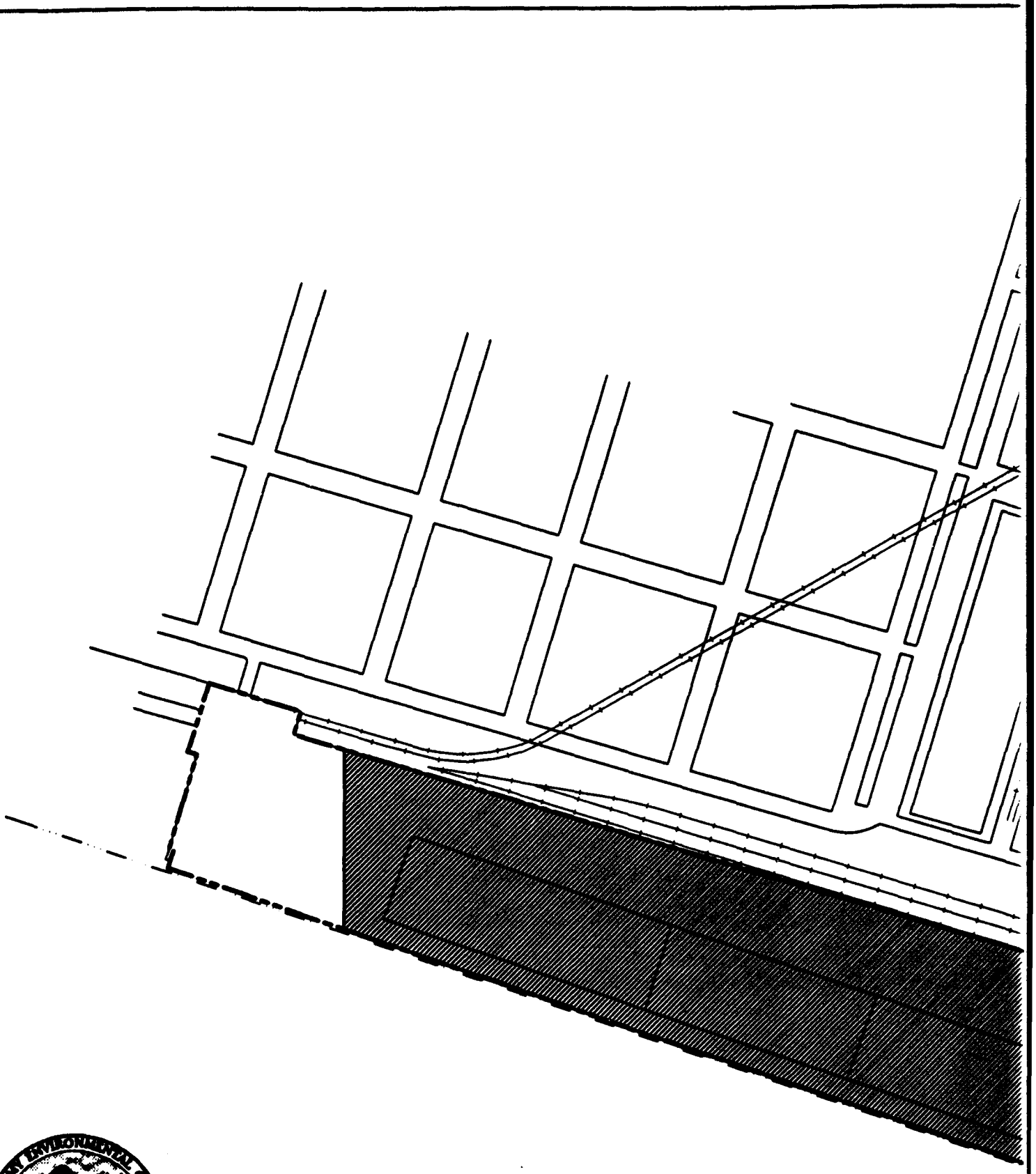

ers
Acreage Fee
0.97
Unknown
42.18
New
North Rampart Street
Poland Avenue
Burgundy Street
Dauphine Street
Lesseps Street
Poland Avenue
New Orleans Public Belt Railroad
Inner Harbor Navigation Con
3
ppi River

Figure 5.2-1
Tract Map
New Orleans Military Ocean Terminal (NOMOT)
New Orleans, Louisiana



PM307.70.01/10.22.93-MKB/04.01.94-CMP/NOA202-1

3



THE ERM GROUP

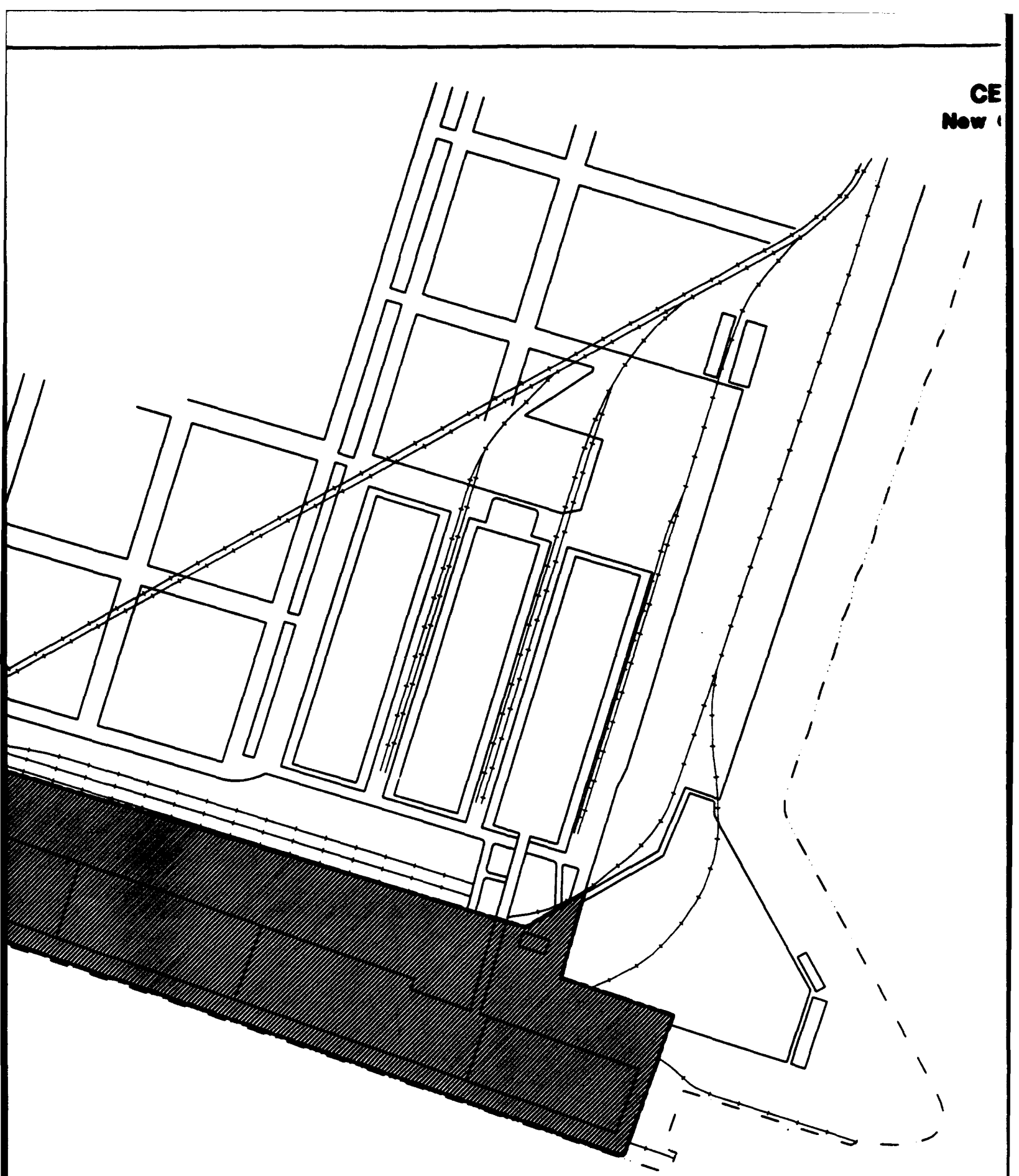
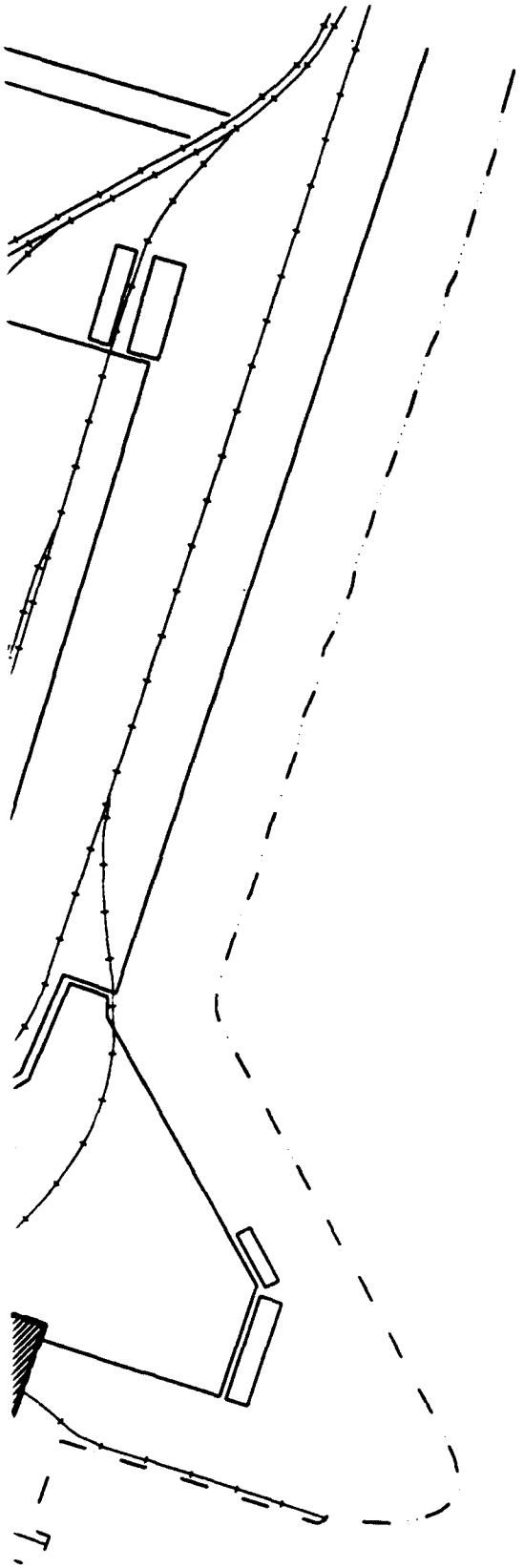

CE
New

Figure 5.3-1
CERFA Parcel Designations
New Orleans Military Ocean Terminal (NOMOT)
New Orleans, Louisiana



LEGEND:

CERFA DISQUALIFIED

CERFA QUALIFIED

CERFA EXCLUDED

CERFA PARCEL

250 125 0 250

Scale in Feet

N

PM307.70.01/10.22.93-MKB/04.10.94-CMP/NOA202-2

(3)

State of Louisiana

Department of Environmental Quality

Edwin W. Edwards
Governor

February 21, 1994

William A. Kucharski
Secretary

Paul E. Wojciechowski
Lt. Colonel, U.S. Army
Acting Chief
Base Closure Division
Department of the Army
U.S. Army Environmental Center
Aberdeen Proving Ground, Maryland 21010-5401

RE: NEW ORLEANS MILITARY OCEAN TERMINAL (NOMOT)
CERFA REPORT REVIEW

Dear Lt. Colonel Wojciechowski:

The staff of the Louisiana Department of Environmental Quality - Inactive and Abandoned Sites Division (LDEQ-IASD) reviewed the referenced report and has one comment under Section 2.3, Interviews. Ms. Lisa Griffin's title is Office Coordinator and not Environmental Engineer.

Please change your files to reflect that Mr. William N. Perry is the current contact from the LDEQ/IASD for NOMOT varying replaced Mr. Don McMillan. The address and telephone number remains the same.

Also, we have reviewed the other responses to the NOMOT Community Environmental Response Facilitation Act (CERFA) forwarded under cover of a letter dated January 28, 1994, and offer no additional comments.

Should you have any questions regarding this matter, please contact Mr. William N. Perry at (504)765-0487.

Sincerely,

Tim B. Knight
Administrator
Inactive and Abandoned Sites Division

TBK:WNP:jl

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN 2 8 1995

Captain Gary Pease
U.S. Army Environmental Center
ATTN: CETHA-BC-A
Building E4480
Aberdeen Proving Ground, MD 21010-5401

Dear Captain Pease:

On December 27, 1994 the Environmental Protection Agency (EPA) received the Draft New Orleans Military Ocean Terminal (NOMOT) Community Environmental Response Facilitation Act (CERFA) Report. Enclosed for your review and incorporation into the NOMOT CERFA Report are EPA's comments.

If you have any questions concerning EPA's comments on the CERFA Report please contact me at (214) 655-6785 or James Harris of my staff at (214) 655-8302.

Sincerely,

David Neleigh, Section Chief
New Mexico - Federal Facilities
RCRA Permits Branch (6H-PN)

cc: Robert Swaine, MTEA-GUL-EN
Don Brandin, SE Regional Coordinator, LDEQ

Comments on the Draft MOMOT CERFA Report

Section 1.1, Purpose and Scope, Page 1-1, third paragraph; and Section 1.2, Definition of Terms, Page 1-2, "CERFA Parcel":

Reference should be made to CERFA amending section 120(h)(3) of CERCLA:

> A parcel may be transferred by deed during the remedial action if the approved remedy has been constructed and its "proper and successful" operation is demonstrated to EPA. Such transfers by deed must reserve a right of access to allow the United States to perform any additional remedial or corrective action.

Section 3.2, Changes to Real Property Environmental Conditions Since Enhanced PA Investigation, Page 3-3, Bullet 3:

In addition to the pools of oily material observed throughout Berth 4, numerous stacks of rubber materials were observed laying on the concrete floor of the berth 4.

> The oily substances should be tested and removed from the floor. The floor should be cleaned and tested for any residual materials prior to reuse.
>
> The stacks of rubber appeared to have been in place for an extended period of time. They should be inspected for any signs of degradation and managed accordingly.

The structural damage outside Berths 4 & 5 should be repaired prior to reuse planning.

Section 4.1.1, Berths 1-4, Page 4-1:

Please document whether the hazardous materials stored are product or hazardous waste.

U.S. Army Environmental Center
Response to Regulatory Comments
New Orleans Military Ocean Terminal CERFA Report (draft)

Comment from State of Louisiana, Department of Environmental Quality letter dated 21 February 1994

1. Section 2.3 (Interviews) Ms. Lisa Griffins title is Office Coordinator and not Environmental Engineer.

ARMY RESPONSE: Concur. The text will incorporate the recommended change.

Comments from U. S. Environmental Protection Agency, Region 6 letter dated 28 January 1994

2. Section 1.1, Purpose and Scope: Make reference to CERFA amending section 120(h) (3) of CERCLA: A parcel may be transferred by deed during the remedial action if the approved remedy has been constructed and its "proper and successful" operation is demonstrated to EPA. Such transfers by deed must reserve a right of access to allow the United States to perform any additional remedial or corrective action.

ARMY RESPONSE: Concur. The text will incorporate the above additional information.

3. Section 3.2, Changes to Real Property Environmental Conditions since Enhanced PA Investigation, Page 3-3, Bullet 3: In addition to the pools of oily material observed throughout Berth 4, numerous stacks of rubber materials were observed laying on the concrete floor of the berth 4.

The oily substances should be tested and removed from the floor. The floor should be cleaned and tested for any residual materials prior to reuse.

The stacks of rubber appeared to have been in place for an extended period of time. They should be inspected for any signs of degradation and managed accordingly.

The structural damage outside Berths 4 & 5 should be repaired prior to reuse painting.

ARMY RESPONSE: The final CERFA report will include the additional details regarding stacks of rubber materials in Berth 4. CERFA does not require any remediation or removal actions for discoveries made during the course of the CERFA investigation. The recommendations regarding testing, cleaning, and repair are being

relayed to the NOMOT engineering office for clean up by the property lessee, City of New Orleans Dock Board.

4. Section 4.1.1, Berths 1-4, Page 4-1: Please document whether hazardous materials stored are product or hazardous waste.

ARMY RESPONSE: Concur. Nature of the stored hazardous materials will be clarified in the final CERFA report.