



# Agriculture Street Landfill Site Reuse Assessment

## New Orleans, LA

*Prepared for EPA Region 6,  
and the City of New Orleans*

*July 29, 2014*



# *Reuse Assessment Purpose*

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Identify future use goals and a set of prioritized reuse options suitable for Agriculture Street Landfill Operable Unit 1 (OU 1).

# Overview

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- Background and Site Conditions
- Site Planning Context
- Reuse Considerations
- Tools for Superfund Redevelopment
- Examples of Successful Redevelopment on Landfill Sites



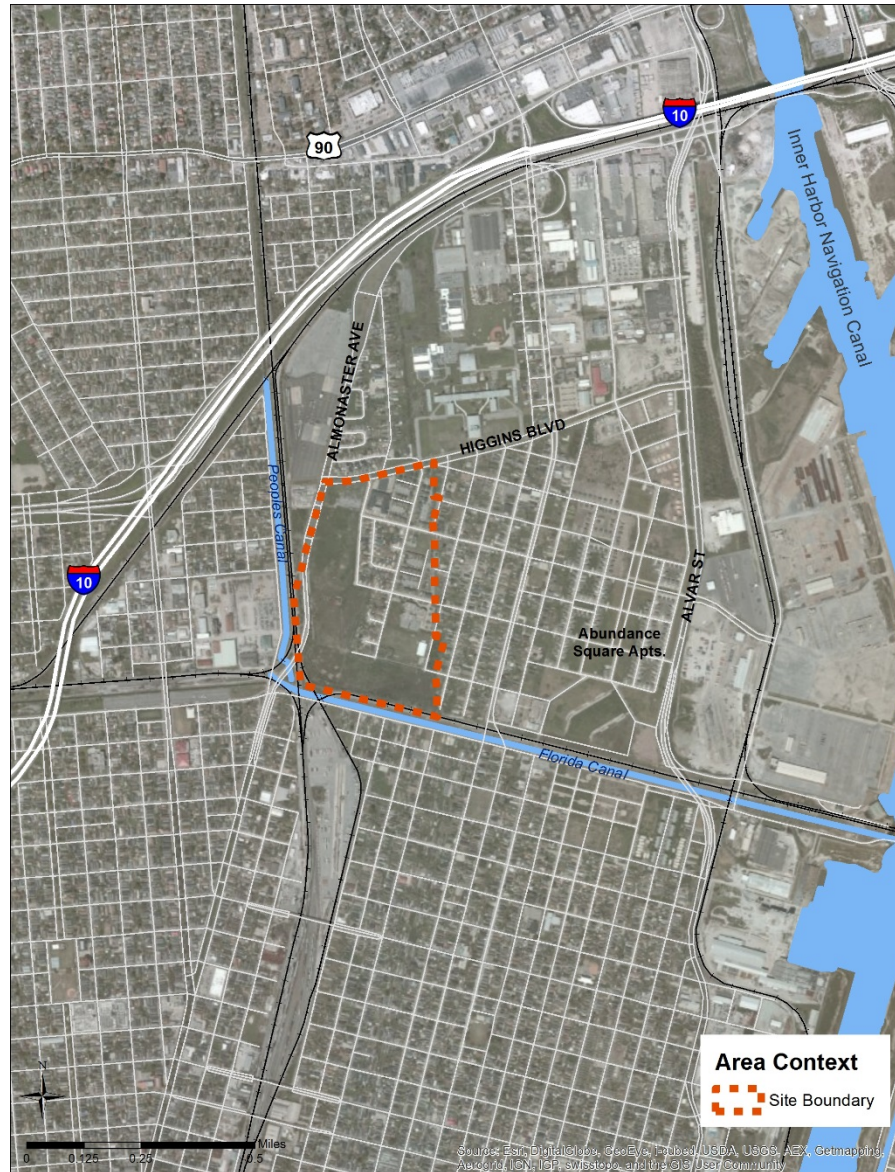
# *Background and Site Context*

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# Site Location



- The 95-acre site is located in eastern New Orleans.
- The site is bounded on the north by Higgins Boulevard, on the northwest by Almonaster Blvd., and on the south and west by the Southern Railroad rights-of-way.



# History of Site Land Use

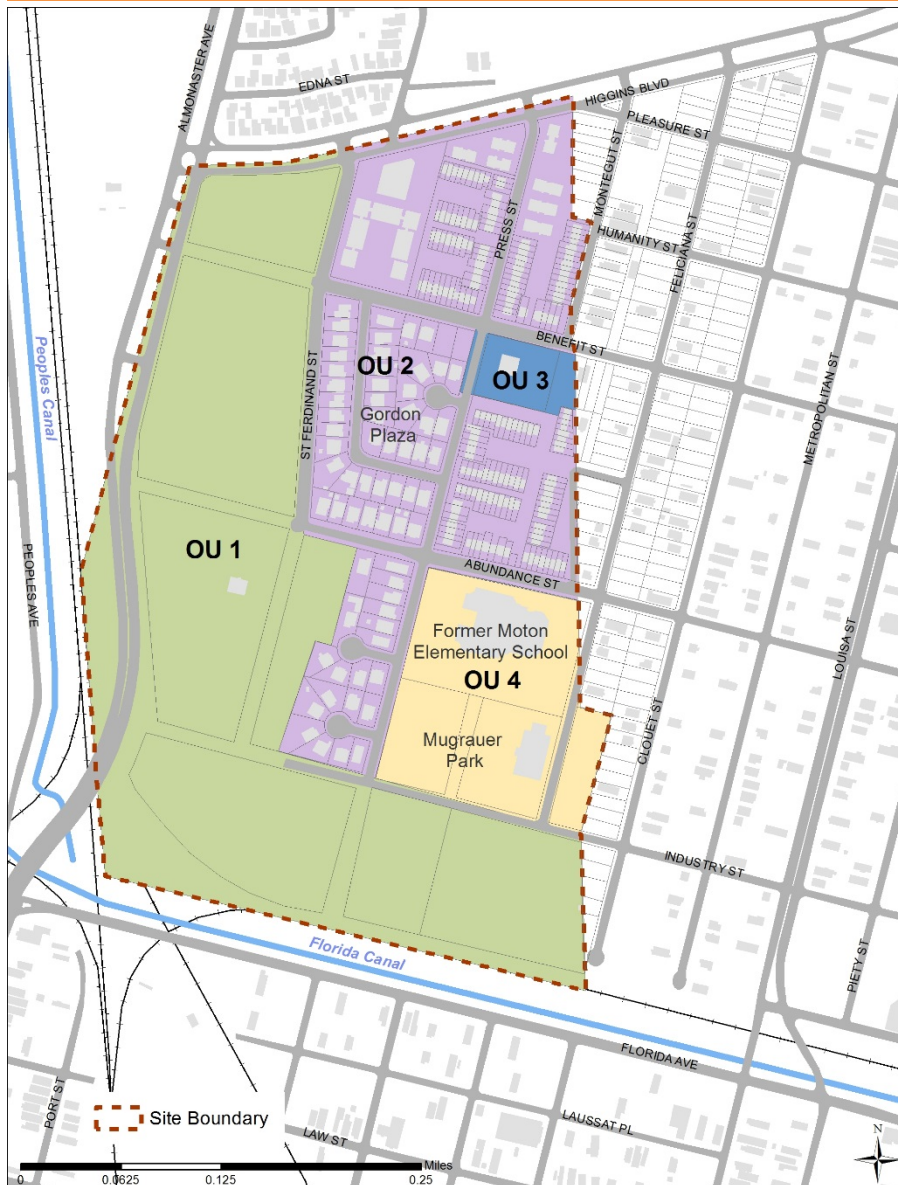
Date	Activity
1909 to 1950s	Site used as a municipal landfill for the City of New Orleans.
1965	Landfill reopened as burning and disposal area for Hurricane Betsy debris.
1970s to 1980s	47 acres developed as single-family and multi-family residences, retail businesses, an elementary school, a community center and a recreation center.
1993	Lawsuit filed by private property owners regarding lack of landfill and settlement disclosure. Litigation still pending. EPA is not a party to the lawsuit.
1994	Moton School closes due to structural concerns.

# Site Remedial History

Date	Activity
1986	EPA completed a site investigation.
1993	EPA initiated an Expanded Site Investigation.
1994	Site listed on National Priorities List.
1997	Removal/Remedial Action - Removal and/or capping of contaminated soil for Operable Units 1, 2 and 3.
1997	Record of Decision Signed for OU4 and OU5. No action required due to lack of risk to human health.
2000	OUs 4 and 5 Deleted From the National Priorities List
2002	Record of Decision Signed for OU1, OU2 and OU3 EPA anticipates deleting OU1, 2 and 3 from the NPL in 2014-2015.
2008	Consent Decree lodged with the court to protect the site remedy and specify site use and activity restrictions.



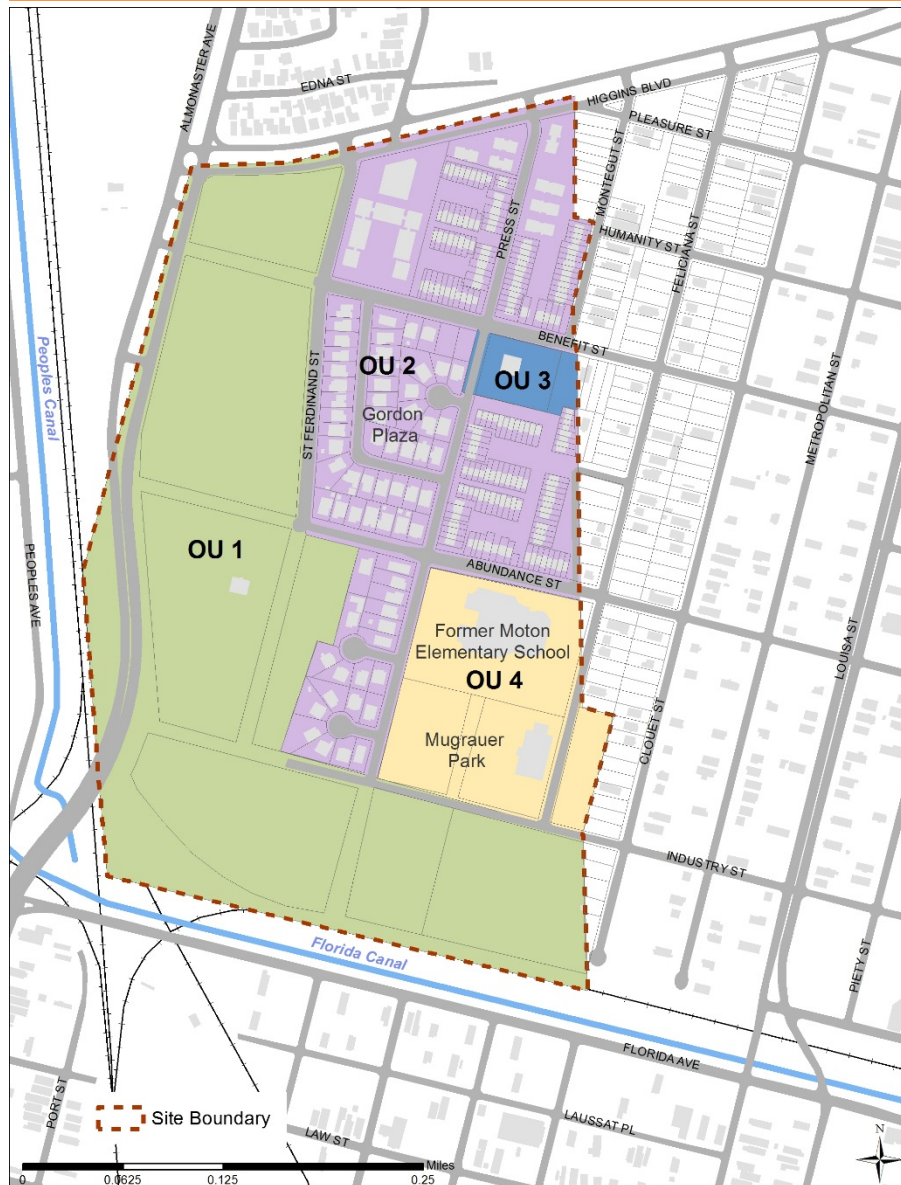
# Remedy Components



- **OU1:** Removal, grading and placement of 12 inches of soil.
- **OU 2 and OU 3:** Removal of top 24 inches of existing soil and waste material on the residential properties and community center, and backfilling the excavated areas with 24 inches of clean fill and vegetation.
- **OU3:** Playground equipment was removed to address contaminated area and new equipment was installed.
- **OU4 and OU5:** No action required because there was no risk to human health or the environment.



# Remedy Considerations



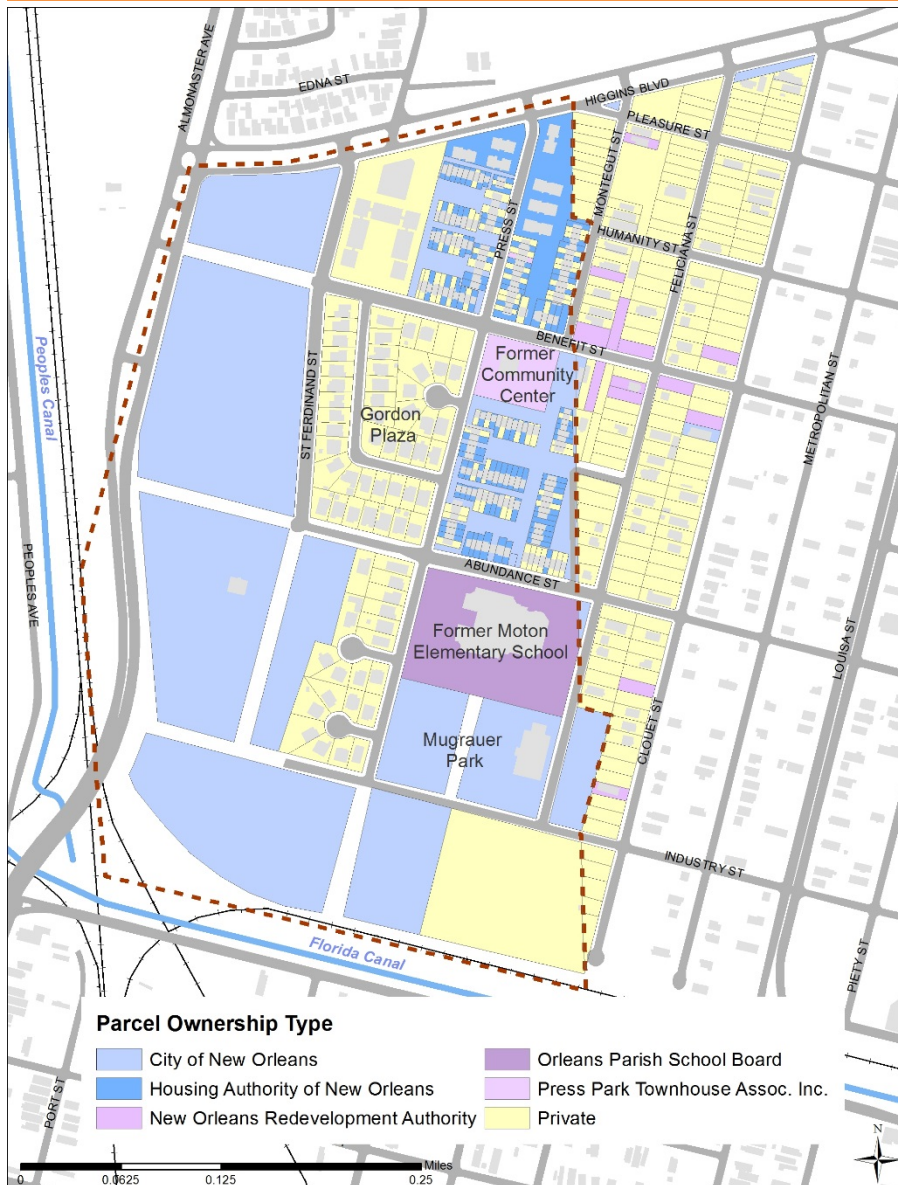
- Any excavation below 2 feet or filter fabric marker will require coordination with the City to follow proper protocol.
- Future use plans should be coordinated closely with EPA Region 6 to ensure consistency with any use restrictions.

# Depth of Waste



- Depth of waste ranges from 5 to 15 feet.
- Settlement may occur over time.

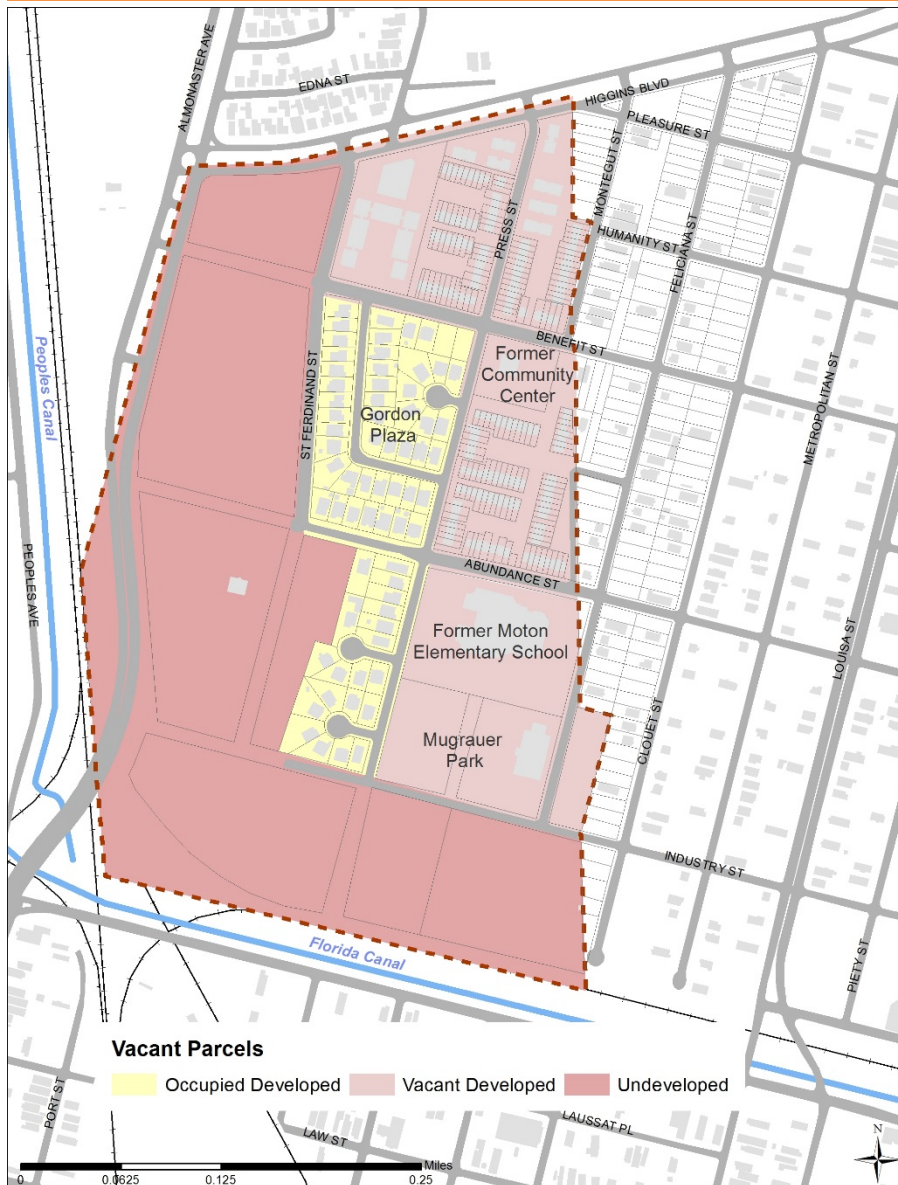
# Property Ownership



- Much of the site is City owned and is shown in light blue, located mostly on the west side of the site boundary (dashed line).
- Demolition on parcels owned by HANO is underway.
- School Board has listed property as surplus land and is interested in selling.
- Private development consists of a shopping center, apartments and 67 single family dwellings.



# Vacant Properties



- Much of the site is also vacant except for the private residential properties in the center.

# City-Owned Vacant Property (OU 1)

- Approximately 48 acres of undeveloped land
- Owned by City of New Orleans
- The U.S. Army Corps of Engineers plans to use southwest corner as a staging area during canal drainage project.





# Gordon Plaza (OU 2)

## Gordon Plaza Subdivision

- active residential community
- 67 single-family homes
- several vacant homes (damaged by Katrina)



## Gordon Plaza Shopping Center and Apartments

- Privately owned
- Vacant (damaged by Katrina)

These areas are not currently available for redevelopment due to ownership and lawsuit.





# Press Park (OU 2 – OU 3)

## Press Park and Press Court Apartments

- Owned by Housing Authority of New Orleans and private owners (HANO)
- vacant (damaged by Katrina)

## Shirley Jefferson Community Center

- Owned by Press Park Townhouse Association
- vacant (damaged by Katrina)

These areas are not currently available for redevelopment due to ownership and lawsuit.



# Moton Elementary & Park (OU 4)

## Moton Elementary School

- Owned by Orleans Parish School Board
- Closed in 1994
- School Board has declared property as surplus land and may be available for purchase and redevelopment

## Mugrauer Park

- Playground and maintained open space
- The Center is closed





# *Site Planning Context*

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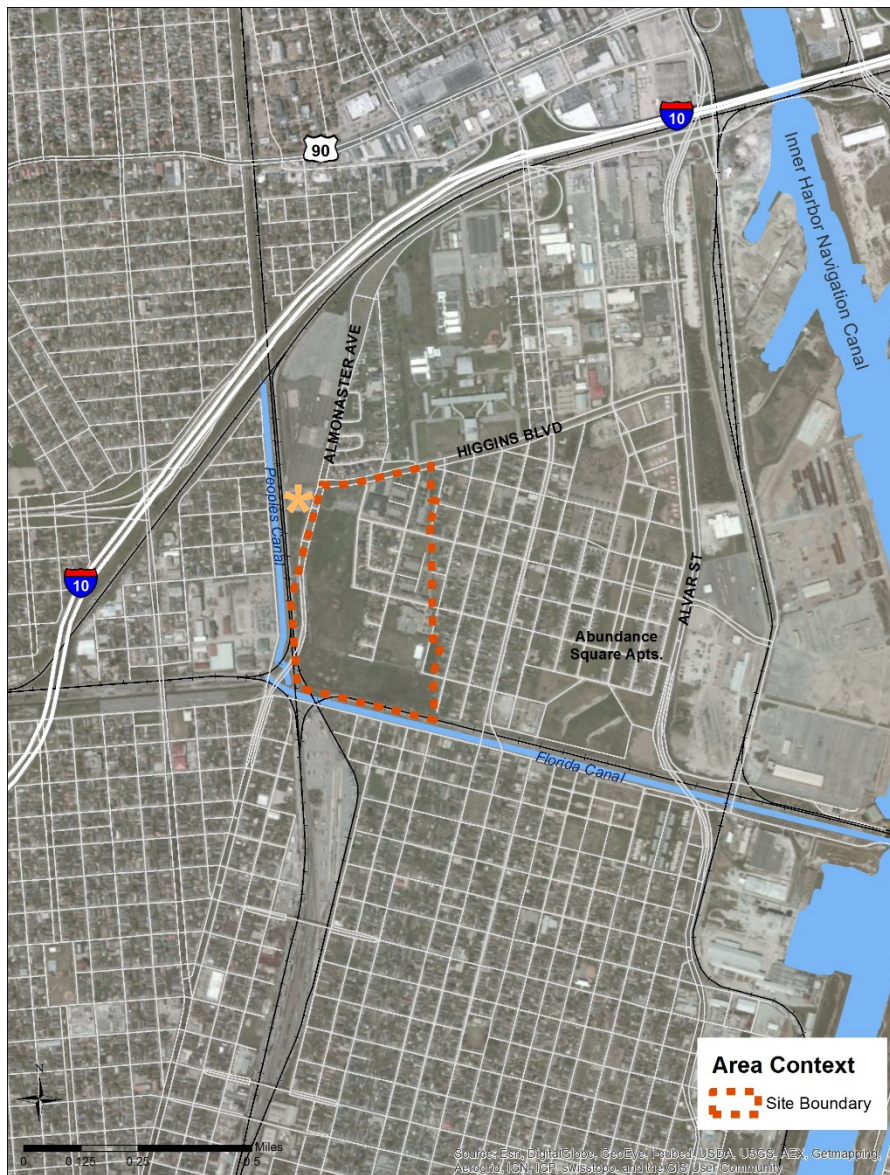
# Site Access



- Improved access with good visibility could be created off of Almonaster Blvd.

- Existing access points (Yellow solid circle)
- Potential access points (Yellow dashed circle)

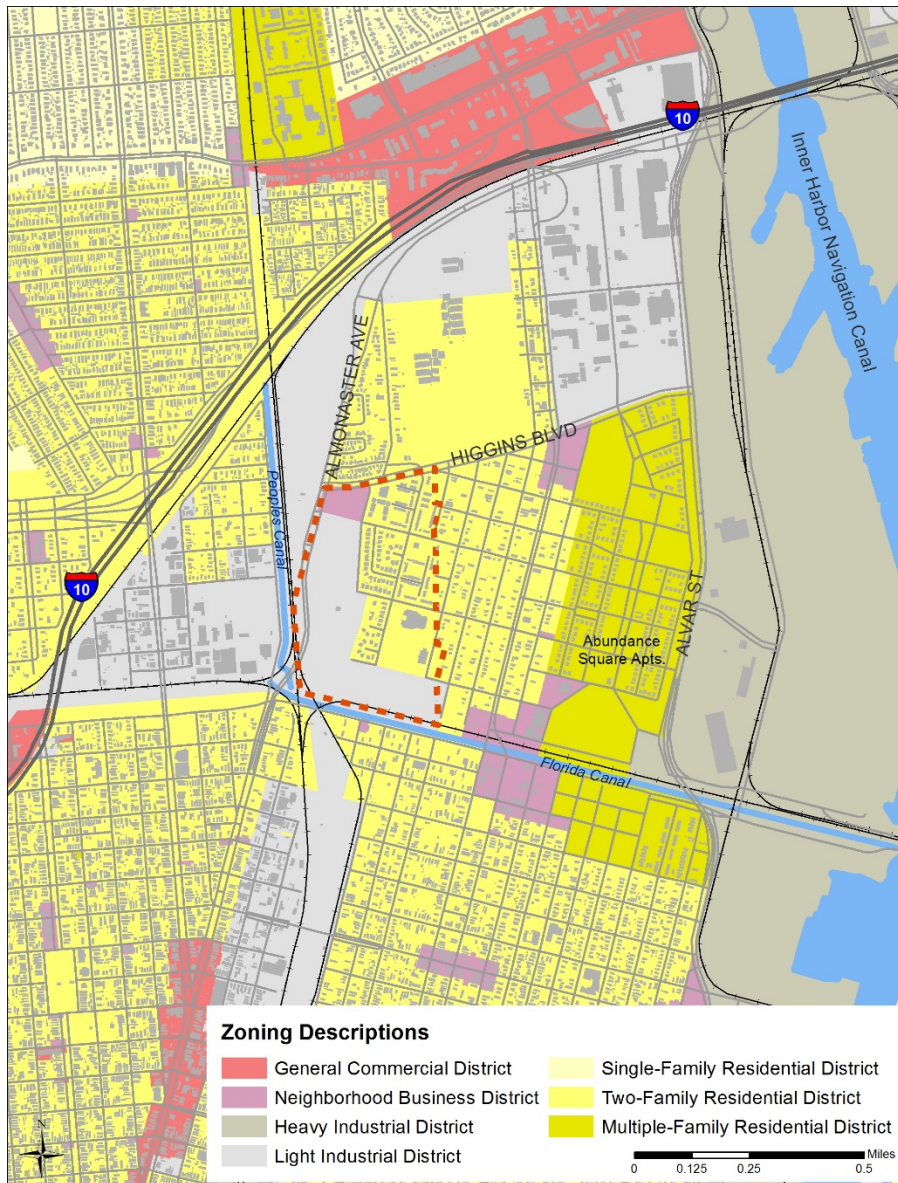
# Site Infrastructure



- Convenient highway access (I-10)
- Adjacent rail line
- Planned flood improvements via Florida Canal project
- Adjacent electrical substation \*



# Area Zoning



- The majority of the site and surrounding area is zoned two-family and multi-family residential.
- Includes several neighborhood business districts.
- Commercial north of US-10 contains restaurants, retail stores and grocery stores.
- Surrounded on east and west by light industrial.
- Heavy industry blocks resident access to the Inner Harbor Navigation Canal.





# *Reuse Considerations*

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# *Reuse Opportunities*

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- Nearby residential areas could benefit from additional neighborhood amenities, services or open space that complement on-going revitalization efforts.
- Potential for light industrial uses with enhanced access and good visibility from Almonaster Blvd.
- Opportunity to integrate larger scale open space and flood control.
- Potential to coordinate larger future use vision across publicly owned property.

# *Reuse Opportunities*

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New Orleans Business Alliance sees potential for light industrial / manufacturing based on site's assets:

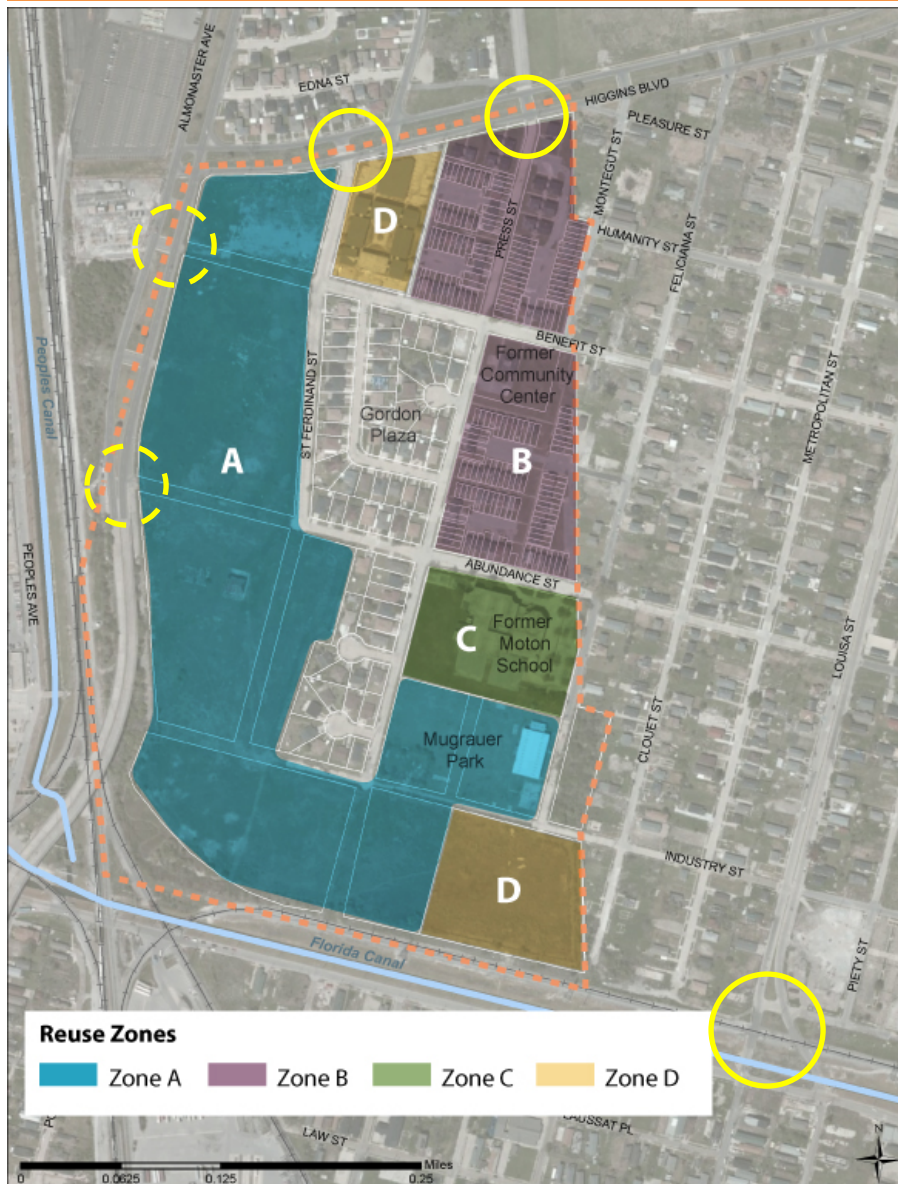
- Good access and visibility from major roads
- Adjacent electrical substation
- Large amount of contiguous land for urban infill development
- Proximity to rail and highway
- Canal infrastructure improvements
- Proximity to community college and skilled work force

# *Reuse Considerations*

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- City is interested in selling the property for private light industrial development or other suitable use.
- Future uses must be compatible with the remedy and consent decree which specifies that the cover must be maintained.
- Reuse may need to mitigate for differential settlement over time.
- Engaging nearby residents and property owners will help build support for future use.
- Development, planning and permitting may gain more support once litigation is resolved.

# Reuse Suitability Zones



## Zone A: City Owned Undeveloped

- Currently available for purchase and redevelopment

## Zone B: HANO / Privately Owned Vacant

- Currently not available at this time

## Zone C: School Board Owned Vacant

- Surplus land and might be available for purchase

## Zone D: Privately Owned Vacant

- Future use plans unknown

Existing access points

Potential access points



# *Tools for Superfund Redevelopment*

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# *Tools for Superfund Redevelopment*

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EPA can provide prospective purchasers a range of tools to support reuse and redevelopment at the Agriculture Street Landfill Superfund site, such as:

- Ready for Reuse Determination
- Delisting from National Priorities List
- Comfort Letter
- Return to Use Demonstration Projects

# Tools for Superfund Redevelopment

## Ready for Reuse Determinations

EPA can provide potential users of the Agriculture Street Landfill Superfund site with an environmental status report that documents a technical determination by EPA that all or a portion of a site can support specified types of uses and remain protective of human health and the environment.



# Tools for Superfund Redevelopment

## Comfort Letter

- EPA can issue a site status letter (or comfort letter) for the Agriculture Street Landfill Superfund site which conveys a brief site history, any site constraints or continuing obligations, information on CERCLA liability, and appropriate reuse and redevelopment.
- A comfort letter can provide reassurance to a potential lender, developer or lessee interested in purchasing or redeveloping the site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8  
1445 ROSS AVENUE, SUITE 1200 (8SF-RA)  
DALLAS, TEXAS 75202 ~ 2733

March 24, 2014

RCAK Properties, LLC  
13115 Bach Elm Street  
Houston, TX 77070  
Attn: Robert J. Hubregsen

Re: South Cavalcade Street Superfund Site  
RCAK Properties, LLC purchase of 2000 Cavalcade, Houston

Dear Mr. Hubregsen:

I am writing in response to information you provided to the U.S. Environmental Protection Agency ("EPA") concerning the South Cavalcade Street Superfund Site ("Site") via email on November 21, 2013, including your letter to EPA dated March 18, 2014, and submissions to EPA on March 17 and 18, 2014, and during our numerous conference calls, including those on November 13, December 10, December 16, December 18, 2013 and February 24, March 4, March 7, March 17, and March 19, 2014. During our conference calls you described your intentions to purchase property commonly known as 2000 Cavalcade, Houston, Texas 77009, which is approximately 22.49 acres of the northern portion of the Site, for the purpose of operating an auto auction facility, and requested a comfort/status letter from the EPA. The purpose of this comfort/status letter is to provide you with information the EPA has about the Site and applicable Agency policies, as of the date of this letter. We hope the information in this letter enables you to make informed decisions as you move forward with plans to purchase the Property for purposes of operating an auto auction facility.

Under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA", commonly referred to as Superfund), the EPA's mission is to protect human health and the environment from the risks posed by contaminated or potentially contaminated lands. In doing so, it is an Agency priority to return contaminated lands to productive reuse.

### Property Status

Information on hazardous waste sites is contained in the Comprehensive Environmental response, Compensation, and Liability Information System ("CERCLIS"). Site-specific documents and fact sheet can be accessed through CERCLIS at <http://www.epa.gov/superfund/sites/cursites/index.htm>.

The Site occupies approximately 66 acres of land located about three miles north of downtown Houston, Texas, and about one mile southwest of the intersection of Interstate Loop 610 and U.S.

*Excerpt of Comfort Letter issued for a  
Superfund site in Texas*

# Tools for Superfund Redevelopment

## Return to Use Demonstration Project Factsheets

Demonstration project factsheets provide valuable lessons about the barriers to reuse that might arise at Superfund sites and the tools and resources available to address them.

<http://www.epa.gov/superfund/programs/recycle/activities/rtudemos.html>

### RETURN TO USE INITIATIVE

2014 Demonstration Project

#### BAYOU BONFOUCA SITE:

Slidell, Louisiana

**THE SITE:** The 54-acre Bayou Bonfouca Superfund site (the Site) is located on the western edge of Slidell, Louisiana. Between 1872 and 1970, American Creosote Works, Inc. operated a wood treatment plant on the Bayou Bonfouca, a low land marsh channel that drains into Lake Ponchartrain. A fire at the Site released creosote into the bayou, contaminating land, sediments, surface water and ground water. Contamination made the bayou and adjacent land areas uninhabitable for aquatic life and water birds.

In 1983, after investigations revealed the extent of the contamination, EPA added the Site to the Superfund program's National Priorities List (NPL). Local authorities restricted access to the Site and in 1987, the Louisiana Departments of Health and Hospitals and of Environmental Quality issued a written advisory and posted signs warning citizens not to swim in or eat fish or shellfish taken from the bayou. In 1993, the cleanup effort began, including excavation of the plant area, dredging of the bayou and Eastern Drainage Channel, and incineration and disposal of affected materials in an on-site landfill. Though EPA completed the cleanup in 1995, a pump-and-treat system remains in operation to address contaminated ground water and regular remedial component operation and maintenance continues.

**THE OPPORTUNITY:** EPA constructed buildings during cleanup to store remedial components, but the Agency no longer needed the structures after completing remedial efforts. The City of Slidell recognized opportunities to reuse the buildings remaining on site in its public works program.

In addition, the Site occupies prime waterfront at the northernmost section of the navigable portion of the bayou. Lake Ponchartrain, located seven miles south of the Site, is popular for fishing, boating and other recreational uses. The site property could provide a



**PICTURED:** The entrance to the City of Slidell's public works and maintenance yard. (Source: LDEQ)

**POTENTIAL BARRIERS:** Contamination of land and surface water along the bayou created a negative public image and restricted use of the Site and waterway.

**SOLUTION:** Early and continued collaboration between site stakeholders has already brought about recreational, ecological and public works reuses at the Site. The City of Slidell continues to work with EPA and the state to explore opportunities for expanded community amenities that will be protective of the remedy.



**PICTURED:** The City of Slidell's Heritage Park. (Source: EPA)

**BEFORE:** Contaminated waterway with no aquatic life, water birds or opportunities for recreational activities.

**AFTER:** Public recreation facilities at Heritage Park and a boat launch on Bayou Bonfouca, which gives access to greater Lake Ponchartrain. Following cleanup, the waterway once again supports a thriving aquatic ecosystem. The City of Slidell's public works department stages heavy vehicles and equipment at a portion of the Site and the state continues to operate a ground water treatment facility on the Site as well.

 United States Environmental Protection Agency

Superfund Redevelopment Initiative

February 2014 1

*Excerpt of factsheet for a Superfund site in Louisiana*



# *Successful Landfill Redevelopment*

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# Successful Landfill Redevelopment

Here's an example of a 38 acre landfill developed as a parking facility for municipal vehicles.

To view this and other Superfund reuse examples, visit:

<http://www.epa.gov/superfund/programs/recycle/pdf/sri brochure 2013.pdf>



**Before:** Former landfill, including a former leaf compost area (above).

This former landfill occupies about 38 acres; people disposed of waste there from 1933 until 1975. A site inspection in 1982 found that former landfill practices had contaminated site soil and ground water and had created the potential for exposure to landfill gas. The EPA added the site to the NPL in 1983. The cleanup included putting in a ventilation trench to prevent potential gas vapor migration from the landfill as well as a cap to contain buried wastes. Following the cleanup, the EPA deleted the site from the NPL in 2005 and the Town of Oyster Bay returned the site to productive use. Parking areas for the town's highway division sanitation vehicles as well as storage facilities for salt and equipment are now located on the site. In 2009, the town received American Recovery and Reinvestment Act funds through the U.S. Department of Energy Clean Cities Alternative Fuel and Advanced Technology Vehicles Pilot Program to build a compressed natural gas fueling facility station at the site and to convert 44 sanitation trucks from diesel fuel to compressed natural gas. The town completed the facility in 2011. The EPA estimates that the converted, clean-burning trucks will reduce the town's petroleum use by 264,000 gallons a year, saving money and lowering the fleet's greenhouse gas emissions.

**After:** Local government service facilities for the community of Oyster Bay. The Department of Public Works uses a portion of the site to park sanitation vehicles (top) and the Town's Separate Oyster Bay's Recyclables Today (SORT) recycling trucks fuel up at compressed natural gas slow fill terminals (bottom).

## Region 2

*Syosset Landfill  
Oyster Bay, New York*





# Successful Landfill Redevelopment

A portion of this landfill in SC was redeveloped as a golf practice facility.

To view this and other Superfund reuse examples, visit:

<http://www.epa.gov/superfund/programs/recycle/pdf/sri brochure 2013.pdf>



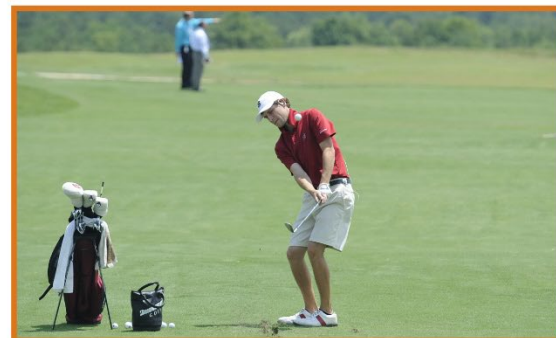
**Before:** Former landfill. Dumping of municipal wastes also occurred at three areas of the site (above).

This former municipal landfill accepted waste from the 1940s until 1988. Site dumping practices resulted in ground water contamination and the EPA placed the site on the NPL in 1989. With future reuse opportunities in mind, Lexington County decided to lead and fund site cleanup activities. More than 30,000 cubic yards of recycled tires are part of the site's landfill cap. The site's irrigation system uses treated ground water to help maintain grasses and golf facilities on site. The local government also located a recycling center on site and collaborated with site agencies and the University of South Carolina (USC) to redevelop the northern part of the site into "the Coop," a top-of-the-line, 9-acre golf practice facility for the university's golf teams. EPA Region 4 awarded Lexington County the Region 4 "Excellence in Site Reuse" award in recognition of the County's extraordinary efforts to build partnerships with local businesses, explore green remediation options and conduct cleanup in a way that would facilitate the safe and appropriate reuse of this site.

**After:** During the cleanup, Lexington County explored innovative and green remedial techniques; the County used 30,000 cubic yards of recycled tires to help construct the site cover (top). The EPA, State of South Carolina, Lexington County, Richardson Smith Gardner and Associates, Inc. and USC worked together to redevelop the northern area of the site into a golf practice facility (bottom).

## Region 4

*Lexington County  
Landfill Area,  
Cayce, South Carolina*



# Successful Landfill Redevelopment

24,414 PV solar panels installed on a 42-acre landfill in Brick Township, NJ. Estimated annual production is 7,400 MWh.



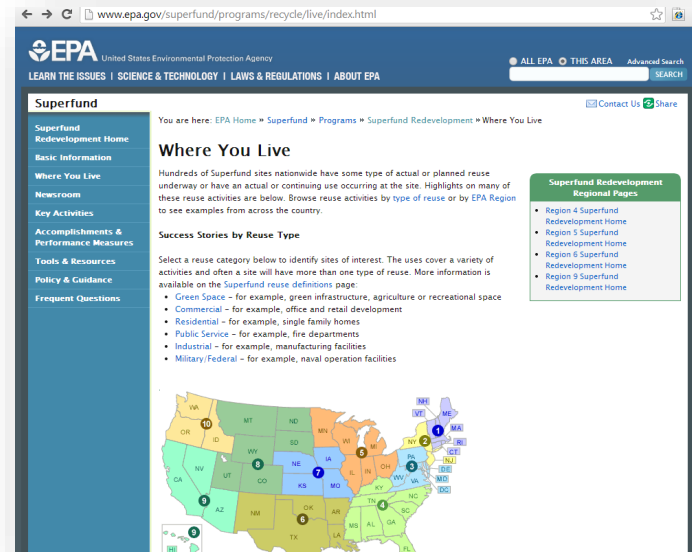
View the archived webinar to learn more about this site at: [http://www.cluin.org/conf/tio/sri\\_071614/](http://www.cluin.org/conf/tio/sri_071614/)



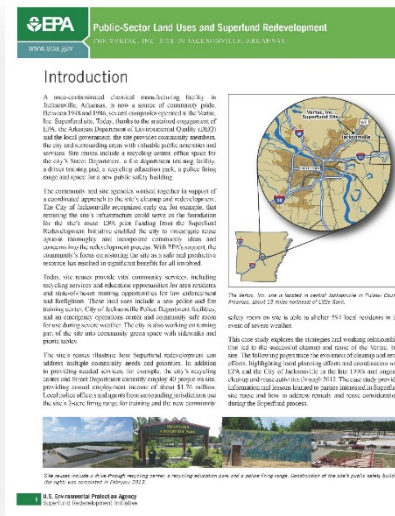
# Superfund Redevelopment Initiative

EPA's Superfund Redevelopment Initiative (SRI) provides a range of information on successful Superfund redevelopment from around the country, including:

- Browse successful reuse examples by type of reuse or geographic location at:  
<http://www.epa.gov/superfund/programs/recycle/live/index.html>
- Browse in-depth case studies to see what strategies worked and how communities created new reuse outcomes at:  
<http://www.epa.gov/superfund/programs/recycle/tools/casestudies.html>



SRI website example



Excerpt of a case study



# Contact Information

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For additional information regarding the Agriculture Street Landfill Site, please contact:

Ursula Lennox

Remedial Project Manager, EPA Region 6

[Lennox.Ursula@epa.gov](mailto:Lennox.Ursula@epa.gov) / 214-665-6743

For additional information regarding the EPA Region 6 Superfund Redevelopment Initiative, please contact:

Casey Luckett-Snyder

Reuse Coordinator, EPA Region 6

[Luckett.Casey@epa.gov](mailto:Luckett.Casey@epa.gov) / 214-665-7393

Or visit: [www.epa.gov/superfund/programs/recycle/index.html](http://www.epa.gov/superfund/programs/recycle/index.html)