

## **EXHIBIT 13a – ADDITIONAL INFORMATION ON THE “ENCLOSED STRUCTURE EVALUATION”**

*Excerpt from “Phase I – Environmental Site Assessment”  
(Section 9 - Opinions)  
(Full Report is Separately Bound)*

*Excerpt from “FINAL Construction Completion Report”  
(Section 4.0 Summary and Recommendations)  
(Full Report may be Obtained from the Owner)*

## 9 OPINION

This section includes the environmental professional’s opinion of the impact on the *property* of conditions identified in the findings section (refer to Section 8.0). The following numbered opinions correspond with the numbered findings in Section 8.0.

### Opinion 1      **This finding is not considered to be a recognized environmental condition.**

The finding is not considered to be a recognized environmental condition. Although the *property*’s use cannot be confirmed in 5 year intervals, the use of the *property* has been identified from its first developed use to its current use with no gaps in use identified.

### Opinion 2      **This finding is considered to be a recognized environmental condition.**

The finding is considered to be a recognized environmental condition. This finding is considered to be a controlled recognized environmental condition. According to the “Base Wide Corrective Measures Implementation Work Plan for Land Use Controls Former England Air Force Base, Alexandria, Louisiana” dated May 2015, SWMU No. 179 (the *property*):

- Is restricted to industrial/commercial use only (Table 1) as part of a conveyance agreement between the Air Force and England Authority.
- The on-site soils were removed in 2014. The soil left in place meets non-industrial (residential) standards, and therefore a land use restriction is not required.
- If building construction is planned at the site, an enclosed structure evaluation must be performed and submitted to LDEQ prior to the start of construction.

Since LDEQ has restricted building construction on the site by requiring an enclosed structure evaluation, this finding is considered to be a Controlled Recognized Environmental Condition (CREC); which is considered a Recognized Environmental Condition.

### Opinion 3      **This finding is not considered to be a recognized environmental condition.**

The finding is not considered to be a recognized environmental condition.

This site (Hertz Corporation) is located approximately 2,000 feet southwest of the *property*. The database findings are resolved as follows:

- LA UST – Three (3) on-site fuel storage tanks have a status of closed.

- EL SHWS – Approved completion and evaluation, and closed on May 6, 2008.
- REM – Approved Completion and evaluation, and closed on May 6, 2008.

Therefore, this finding is not considered to be a Recognized Environmental Condition with regards to the *property*.

Opinion 4    **This finding is not considered to be a recognized environmental condition.**

The finding is not considered to be a recognized environmental condition due to the lack of likely release to the site from a hazardous substance/petroleum product.

Opinion 5    **This finding is not considered to be a recognized environmental condition.**

The finding is not considered to be a recognized environmental condition because the tank does not appear to present a material threat of a future release nor is it obvious that a likely release to the site has been made from the above ground storage tank.

## **4.0 Summary and Recommendations**

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CB&I performed soil excavation activities at the POL Yard between July and November 2014 in accordance with the approved CAP (CB&I, 2014a). The corrective action objective was to remove POL Yard soil with contaminant concentrations exceeding the LDEQ RECAP MO-1 non-industrial standards, thus allowing for nonindustrial site closure.

### **4.1 Summary of Activities**

The remediation effort at the POL Yard site included the following activities:

- Permitting
- Mobilization and site preparation activities
- Excavation and direct loadout of contaminated soil
- Transportation and off-site soil disposal
- Backfilling of excavation areas with clean soil
- Post-excavation confirmation sampling in select areas
- Site restoration.

Permitting activities involved obtaining authorization to discharge storm water under an LPDES construction storm water permit and obtaining authorization from the City of Alexandria to discharge groundwater that was recovered from excavation activities and treated via granular activated carbon vessels in CB&I's mobile WWTS.

Mobilization of personnel, supplies and equipment was performed during the week of July 28, 2014. Site preparation activities also began in late July 2014 and included mowing vegetation at the site, setup of CB&I's temporary office trailer and mobile WWTS, establishing traffic control procedures, and installation of sedimentation and erosion control measures, such as silt fencing and check dams. Other site preparation activities included removal of the rail spur within the excavation footprint (the rail materials and ballasts were retained for use by the England Airpark) and demolition of the earthen berms that surrounded the former ASTs. The berm material had been previously characterized as suitable for reuse as backfill during the 2014 pre-excavation investigation (CB&I, 2014a).

Excavation of petroleum-contaminated soil began on August 13, 2014 and followed the excavation strategy presented in the LDEQ-approved CAP (CB&I, 2014a). The excavation covered approximately 182,000 ft<sup>2</sup> (4.2 acres) and excavation depths ranged from 0 to 10 feet bgs. Excavated soil was direct-loaded into dumptrucks and transported to the IESI Landfill in Oakdale, Louisiana, for disposal as nonhazardous waste. (Note: Pre-excavation waste

characterization sampling was performed during the pre-excavation investigation.) A total of 1,703 truckloads of soil were excavated during the project, which equates to approximately 47,000 tons, or 31,300 cubic yards. During the excavation activities, approximately 15,000 gallons of groundwater was recovered and treated by granular activated carbon prior to discharge to the City of Alexandria's sanitary sewer.

The excavation was backfilled using over 40,000 cubic yards of "Red Dirt" material from a nearby borrow sources. Berm material was also utilized as backfill. The fill was spread in maximum 8-inch loose lifts and was compacted to achieve 95 percent compaction based on the maximum dry density (ASTM D698). Geotechnical testing was performed to ensure that the compaction methods were successful in meeting the 95 percent compaction requirement.

Post-excavation sidewall and floor confirmation soil samples were collected to document that the material remaining on site meets RECAP MO-1 LRS. Confirmation soil samples were collected from six locations along the sidewalls in the northern part of the site in Areas I, J and Q. Eight confirmation floor samples in Area S and four confirmation floor samples in Area R were collected for analysis of TPH using the TCEQ fractionation method. Analytical results from all confirmation soil samples indicated that TPH concentrations were all below the RECAP MO-1 LRS.

Upon completion of backfilling activities, topsoil was spread across the site and final grading was performed. The site was reseeded with temporary (ryegrass) and permanent (bermudagrass) seed using hydroseeding techniques. Erosion control measures will remain in place until and adequate vegetative cover is established, which is expected to occur in June 2015.

#### **4.2 Recommendations**

The 2014 soil excavation activities were successful in removing TPH concentrations that exceeded the MO-1 LRS values in soil that were derived in the LDEQ-approved RECAP evaluation presented in the CAP (CB&I, 2014a). The LDEQ approved CAP (CB&I, 2014a) included pre-excavation soil sampling results that were used to determine the limits of soil excavation described in this report. Additional soil sampling was performed during the excavation activities, and the results confirmed that all soil with TPH concentrations exceeding the MO-1 LRS has been removed. Approximately 47,000 tons of contaminated soil was transported off site for disposal.

Therefore, the POL Yard site meets the requirements closure under RECAP non-industrial standards per Louisiana Administrative Code 33:I, Chapter 13, and is recommended for NFA-ATT. The surface soil MO-1 LRS remedial standards have been achieved; therefore, non-

industrial (residential) use is recommended. Since the non-industrial enclosed structure standards were not achieved, a notification will be provided to property owners that either a) a RECAP enclosed structured evaluation must be performed prior to any building being built or b) new buildings shall be constructed in a manner that will mitigate potential unacceptable indoor air risk posed by vapor intrusion. This notification applies to the areas at the POL Yard site where TPH concentrations exceeded the enclosed structure LRS values (Figure 2-2).

