

Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation
Naval Support Activity Site, 4400 Dauphine Street,
New Orleans, LA 70117
State Tracking Number: TBD

Prepared by the City of New Orleans, City Planning Commission Brownfield Program

I. Introduction & Background

a. Site Location

The site is located at 4400 Dauphine Street, New Orleans, LA 70117 (herein referred to as “the Site”).

b. Previous Site Use(s) and any previous cleanup/remediation

The former Naval Support Activity building (NSA) complex was completed in 1919 by the United States Navy and was used as a logistic station to protect the Port of New Orleans from attack, a shelter and training center for the unemployed and homeless during the Great Depression and later as a recruiting and training station for multiple military branches. It was deactivated by and sold to the City of New Orleans in 2011 to facilitate its redevelopment. The complex is currently vacant and primarily consists of a three, 84,000sq. ft., 6-story buildings (#601, 602, and 603, respectively) on an approx. 1.5 million square foot site.

The former Naval Support Activity (NSA) East Bank complex contains three, identically designed, six-story reinforced concrete former military buildings. Each of the three buildings measure 600ft. long and 140ft. wide. All three buildings are listed under criteria A on the local, state and National Register of Historic Places, due to military importance. The 1.5 million square foot site also includes vacant lots, non-contributing secondary structures, interior drives, and a former Citgo/NEX gas station, all of which are located on the east bank of New Orleans, LA. The neighborhoods that boarder the site and are impacted by known contaminants identified in the assessment reports include the Bywater, Lower 9th Ward, St. Claude and Holy Cross.

The main challenges this brownfield site faces include removal of toxins, contaminants, drainage and removal of above ground storage tanks.

c. Site Assessment Findings

December 2021 the Qualified Environmental Professional group Terracon conducted a Phase 1 hazardous materials survey of site including an asbestos survey and lead-based

paint survey. Asbestos materials, universal waste and lead based paint were all identified. Utilizing X-Ray fluorescence (XRF) to concur findings of lead-based paint inside structures, floor and ceiling tiles and pipe wrap were all found to contain asbestos fibers. A total of 243 bulk samples from 73 homogeneous area were collected showing contaminants of asbestos containing fibers. Non-friable ACM are exclusively asbestos-containing packings, gaskets, resilient floor coverings, asphalt roofing products contain more than 1% asbestos. Category II non-friable ACM includes non-friable ACM in cement pipes, cement siding, cement panels glazing, mortar and grouts. Laboratory analysis confirmed asbestos-containing materials in black and white window caulk, black TSI mastic, white pinhole wall panels, black waterproofing beneath bathroom floors, back stud adhesive.

d. Project Goal

This development will create 295 affordable residential units, assisting with stimulating the economy and increasing the tax base by adding population to the area and bringing more commerce to local businesses. A local grocery store will be the primary first floor retailer included in the development plan, which will also create needed jobs. Property management, retail and security jobs will all be created through this development. The vacant lots included in the development will be transformed into a recreational area for residents, in addition to hosting public events. The recreational areas will include walking trails with native and pollinator plants to support the bee and butterfly populations, and a stage for local music and events, to further promote the music culture of New Orleans. The flat roof tops of the buildings are slated to become a site for solar panel installation, to assist with powering the property and storing energy for power outages, common in New Orleans, especially during hurricane season. Energy efficient appliances are included in the build out as well. There will be no displacement of residents included in this project, alternately affordable housing will create placement and housing for residents.

The property is currently zoned for medium-intensity mixed-use developments which encourage walkable neighborhood centers and corridors, with a mix of residential and commercial uses. The zoning promotes buildings containing vertical mixed-use as well as single purpose uses designed to provide transitions to adjacent lower density residential areas.

II. Applicable Regulations and Cleanup Standards

- a. Cleanup Oversight Responsibility** The City of New Orleans (owner) in partnership with EMDRC (lessee) and with support from LDEQ and RPC will oversee and manage accountability, contracts and manage all QEP activities and reporting. The QEP(s) will lead all site assessment and cleanup planning activities and the local health agency will be involved in the air monitoring.

b. Cleanup Standards for major contaminants

The City of New Orleans City Planning Commission currently anticipates that the state standards for recreational use will be used as the cleanup standards. However, it is

possible that risk-based cleanup standards will be generated for compounds of concern, in accordance with State and EPA regulations.

c. Laws & Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, state environmental law, and City laws, policies and procedures. Federal, State, and local laws regarding procurement of contractors to conduct the cleanup will be followed.

In addition, all appropriate permits (*e.g.*, notify before you dig, soil transport/disposal manifests) will be obtained prior to the work commencing.

III. Evaluation of Cleanup Alternatives

a. Cleanup Alternatives Considered To address contamination at the Site, three different alternatives were considered, including Alternative #1: No Action, Alternative #2: Demolition #3: Environmental Clean Up of the Site

b. Cost Estimate of Cleanup Alternatives

Effectiveness

- Alternative #1: No Action is not effective in controlling or preventing the exposure of receptors to contamination at the Site.
- Alternative #2: Full demolition of the existing structures at the Site would eliminate such hazardous materials as asbestos and lead based paint from the buildings and would include the removal and remediation of other contaminants present from the above ground storage tanks and former gas station.
- Alternative #3: Environmental Clean Up of the Site would remove toxins, contaminants, drainage and removal of above ground storage tanks, as well as abatement and clean-up of the former gas station and preserve the existing structures for reuse.

Implementation

- Alternative #1: No Action on the site could be implemented by leaving the site in its current blighted state and maintaining on-site security 24 hours per day in perpetuity.
- Alternative #2: Demolition of the site would be a simple task in concept but would also require the proper and safe removal of contaminants within the existing structures and on the site.
- Alternative #3: Environmental Clean Up of the Site is moderately difficult to implement. Coordination (*e.g.*, dust suppression and monitoring) during cleanup activities and short-term disturbance to the community (*e.g.*, trucks transporting contaminated materials) are anticipated. However, ongoing monitoring and

maintenance will not be required following the full remediation of environmental contaminants.

Cost

- Alternative #1: No Action will require the cost of providing on-site security 24 hours per day every day in perpetuity.
- It is estimated that Alternative #2: Full Site Demolition will cost \$4.5 million based on the size and type of construction of the existing buildings.
- Alternative #3: Site Cleanup will cost \$3.1 million.

c. Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative #3: Environmental Clean Up of the Site. Alternative #1: No Action cannot be recommended since it does not address site risks and will require recurring expenses to secure the site. Alternative #2: Demolition of the structures on the site is estimated to cost more than remediating the site as proposed in Alternative #3 and eliminates the potential reuse of these historic, well-built structures. Alternative #3: Environmental Clean Up of the Site would require abatement of contamination found on site, asbestos, mold and lead, following EPA and State guidelines. In addition, this alternative would preserve these large historic structures for reuse as much needed housing units and provide opportunities for businesses serving the target area neighborhoods, including a potential full-service grocery store. For these reasons, Alternative #3: Environmental Clean Up of the Site is the recommended alternative.