Analysis of Brownfields Cleanup Alternatives

Former Texarkana National Bank/
Capital One Building
100 W. Broad Street
and Parking Garage
217 – 223 Pine Street
Texarkana, Texas 77501

City of Texarkana, TX

Stanley Consultants INC.
A Stanley Group Company
Engineering, Environmental and Construction Services - Worldwide

FINAL
September2020
Brownfields Agreement: BF-00F62501

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APPENDICES

Section 1

Introduction & Background

1.1 Introduction

The City of Texarkana, Texas (City) developed this Analysis of Brownfields Cleanup Alternatives (ABCA) to evaluate options for the cleanup of asbestos and lead-based paint (LBP) contamination within the Former Texarkana National Bank/Capital One Building and Parking Garage (Project) located on 0.22 acres at 100 West Broad Street on 0.32 acres at 217-223 Pine Street, respectively (Site), in the city of Texarkana, Bowie County, Texas. The City plans to provide funding assistance for the cleanup through the U.S. Environmental Protection Agency (EPA) Revolving Loan Fund (RLF) agreement BF-00F62501 and associated modifications. Due to the historical significance of the building, Texarkana Renewal Properties, LLC (Developer) is seeking historic designation for the Project, and then will apply for historic tax credits, New Market Tax Credits, and Property Assessed Clean Energy (PACE) funding.

1.2 Background

The Site formerly operated as the Texarkana National Bank/Capital One Building and Parking Garage. Both buildings are currently vacant and have been vacant since approximately 2014. The Former Texarkana National Bank/Capitol One Building is located on the southeastern corner of West Broad and Pine Street, and the Parking Garage is located on the Northeastern corner of Pine Street and East 3rd Street. The Site locations are shown on Figure 1 and Figure 2 in Appendix A.

Developed prior to 1885, the Texarkana National Bank/Capital One Building includes eight-stories and approximately 56,250 square feet of building space. In 1905, the property was recorded as being used for a warehouse, and in 1915 it is listed as the Texarkana National Bank, a clothing store and jewelry store. Offices and retail space were located in other areas of the building. Multiple additions and renovations have occurred since the original construction, and historic occupants of the building include a jeweler, drug store, retail shopping, and professional offices.

The five-story, 44,000 square foot Parking Garage and retail space were constructed in 1960 and 1948, respectively. The garage and retail space were historically a grocery store, repository, bank, cotton sampling rooms, offices, buggy repository, harness shop, seed company, gas and electric light company, bookstore, tin shop, tailor, and theatre.

1.3 Site Assessment Findings

The following previous environmental site assessments (ESAs), investigation and cleanup plans have been completed for the Site:

Phase I Environmental Site Assessment Report for Capital One Building - Eximius
Weston Solutions, Inc, December 2019

A Phase I ESA was completed for the City of Texarkana through the EPA Targeted Brownfields Assessment (TBA) Program. The Phase I ESA states that based on a previous soil and groundwater investigation performed at the subject property and two surrounding properties (Eximius Parking Garage and Eximius Parking Lot), concentrations of mercury, lead, and cadmium were reported at concentrations exceeding the Texas Commission on Environmental Quality (TCEQ) Action Levels. Based on information reported in the 2013 Phase II ESA conducted by Terracon, groundwater flow direction was reported to be toward the southwest direction. (Terracon, 2013). During the Phase II activities, depth to groundwater was identified between 17 and 23 feet bgs. Surveys for asbestos-containing materials (ACM) and LBP were conducted in 2013. ACM was detected throughout the building, and LBP was detected the elevator doors and on the 3rd floor walls. Water staining and evidence of mold were observed throughout the building. The report conclusions include the following:

This assessment has revealed no evidence of RECs in connection with the subject property except the following:

- *Presence of impacted soil has been identified on the subject property.*
- *Five Brownfields properties within 1/8-mile of the subject property.*
- *One TX Industrial Hazardous Waste site within 1/8-mile of the subject property.*
- *One AR Voluntary Cleanup Program site within 1/8-mile of the subject property.*
- *Surrounding properties associated with various chemical use identified on historical Sanborn Maps.*
- *One dry cleaner facility (Royal Cleaners – 1089 W. Broad St.) identified in 1922 and 1937 city directory listings and shown on the 1924 Sanborn Map.*

The following HREC was identified during this investigation:

- *Texarkana Gazette Property with a case closed status on a LPST case.*

Business Environmental Risk:

- *The presence of ACM and LBP, and the visible presence of mold, are not considered a REC; however, these would be considered a Business Environmental Risk.*

Phase I Environmental Site Assessment Report for Eximius Parking Garage
Weston Solutions, Inc, December 2019

A Phase I ESA was completed for the City of Texarkana through the EPA Targeted Brownfields Assessment (TBA) Program. The Phase I ESA states that based on a previous soil and groundwater

investigation performed at the subject property and two surrounding properties (Eximius Parking Garage and Eximius Parking Lot), concentrations of mercury, lead, and cadmium were reported at concentrations exceeding the Texas Commission on Environmental Quality (TCEQ) Action Levels. Surveys for asbestos-containing materials (ACM) and LBP were conducted in 2013. ACM was detected throughout the building, and LBP was detected on the basement railings, concrete curbs, beams, and a door frame. Water staining and evidence of mold were observed throughout the building. The report conclusions include the following:

This assessment has revealed no evidence of RECs in connection with the subject property except the following:

- *Presence of impacted soil has been identified on the subject property.*
- *Texarkana Gazette Property with the reported use of solvents, and the number of years in operation at this site.*
- *Multiple surrounding properties typically associated with chemical use within close proximity to the subject property including drycleaners facility, photography shop, printing operations, and service stations.*

The following HREC was identified during this investigation:

- *Texarkana Gazette Property with a case closed status on a LPST case.*

Business Environmental Risk:

- *The presence of ACM and LBP, and the visible presence of mold, are not considered a REC; however, these would be considered a Business Environmental Risk.*

Weston Solutions, Inc. documented the following previously prepared environmental reports in the Capital One Building and Eximius Parking Garage Phase I ESAs:

Phase I Environmental Site Assessment, Capitol One Building
Terracon Consultants, Inc., August 31, 2011

A Phase I ESA was completed in 2011 as part of a community-wide inventory of sites through an EPA brownfields assessment grant. The report identified a REC - historic adjacent property operations associated with commercial and industrial facilities (dry cleaners, machine shop, auto parts store, service station). As a result of the assessment, Terracon recommended further investigation regarding the potential environmental contamination associated with the REC. In addition, Terracon recommended evaluation of potential asbestos, mold, and lead-based paint.

Phase II Environmental Site Assessment Report, Capital One Building and Eximius Properties
Terracon, April 26, 2013

A Phase II ESA was completed on the Capital One Building and the adjacent Eximius Parking Garage and Eximius Parking Lot properties. The three properties were separately assessed under the Phase I ESA stage; However, since the properties are located adjacent on the same city block, Terracon conducted one Phase II ESA for the three areas.

A soil and groundwater investigation was conducted in July 2012. Three soil borings were advanced in the alley and the parking lot to depths ranging from 25 to 30 feet bgs and converted

into groundwater monitoring wells. Soil and groundwater samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), and Resource Conservation and Recovery Act (RCRA) metals. Concentrations of cadmium, lead, and mercury were detected in soils above the Texas Commission on Environmental Quality (TCEQ) Action Levels. Other soil parameters analyzed were below TCEQ Action Levels. All groundwater parameters analyzed for were below the TCEQ Action Levels. Groundwater flow direction was reported to be in a southwesterly direction. Terracon concluded that additional soil investigation may be required to obtain regulatory closure by TCEQ.

An asbestos survey was conducted in December 2012. There were 506 bulk building material samples collected from the Capital One Building and 193 bulk samples collected from the Parking Garage for analysis for asbestos containing materials (ACM). Presence of asbestos was confirmed in samples collected throughout both the Capital One Building and the Parking Garage. The report states the potential exists for suspect asbestos containing materials to be located in the areas above the hard ceiling. Suspect materials may also be located behind the wood wall panel, and recommends the suspect asbestos containing materials should be sampled prior to renovation activities if the activities will disturb the materials. In addition, the report states that debris was observed in various areas of the Capital One Building Complex. The potential exists for the debris to be asbestos containing or contaminated; therefore, Terracon recommended that individuals entering the building be properly trained to recognize asbestos hazards and be equipped with appropriate personal protective equipment.

A Lead Containing Paint Survey was conducted in April 2014. There were 49 paint samples collected from the Capital One Building and Parking Garage combined. Six of the samples contained lead concentrations above the 0.5 percent by weight standard for LBP. An additional 28 samples contained lead at concentrations below the standard but should be considered lead-containing paint for health and safety reasons if disturbed during renovations.

1.4 Project Goal

The goal of the Project is to address environmental concerns so that the Site can be redeveloped into affordable housing, a boutique hotel, convention space, retail shops, office space, storage, and parking for the City's residents. The developer plans to seek historic building designation at the former Texarkana National Bank building once the exterior facade is abated and the original structure is restored as preservation of the historic element of the building is important to the community, and at the parking garage as this structure contains the first motor bank in Texarkana, and the only underground motor bank. Cleanup of the Site is scheduled to begin in the Fall of 2020.

The *Phase II Environmental Site Assessment Report* identified metals impacts to soil above the TCEQ Action Levels; however, the soil samples were not collected on the Texarkana National Bank/Capital One Building or Parking Garage parcels (they were collected in the adjacent alley and the parking lot). The structures on the Texarkana National Bank/Capital One Building and Parking Garage parcels cover the entire properties. There has been no soil or groundwater sampling conducted on these properties. If required, the ABCA for soil and/or groundwater will be a separate document.

Section 2

Applicable Regulations and Cleanup Standards

2.1 Cleanup Oversight

Cleanup and redevelopment of the Site will be conducted in accordance with applicable EPA and State regulations. The Developer, Texarkana Renewal Properties, LLC, will have primary responsibility for implementation of the cleanup. The asbestos and LBP abatement activities will be conducted under the oversight of the Texas Department of State Health Services (TDSHS). A notification will be filed with the TDSHS at least ten working days prior to commencement of the asbestos abatement.

Texarkana Renewal Properties, LLC, will hire qualified contractors to complete the selected cleanup activities. A qualified consultant will be hired to evaluate remedial alternatives and develop specifications for the cleanup of lead-based paint, asbestos, and other potential hazards within the building. The consultant will oversee and monitor all cleanup activities conducted on-site. Cleanup will be carried out by a qualified contractor with appropriate certifications/licenses in the handling of materials containing lead and asbestos.

2.2 Cleanup Standards

Asbestos – Final clearance air monitoring will be performed after the asbestos and asbestos contaminated debris is removed. Clearance air monitoring must be completed for all abatement projects except where demolition will commence immediately following completion of abatement and successfully passing final visual clearance. The final air clearance will be conducted using aggressive air sampling techniques as defined in the EPA Asbestos Hazard Emergency Response Act (AHERA) regulation 40 Code of Federal Registry (CFR) 763, Subpart E, Appendix A. The final clearance requirements will be one of the following:

- National Institute for Occupational Safety and Health (NIOSH) Phase Contrast Microscopy (PCM) Method for PCM sampling and analysis using NIOSH Manual of Analytical Methods (NMAM) Method 7400: The fiber concentration inside the abated regulated area,

for each airborne sample, shall be less than 0.01 feet per cubic centimeter (f/cc). The abatement inside the regulated area is considered complete when every PCM final clearance sample is below the clearance limit. If any confirmation sample result is greater than 0.01 f/cc, abatement is incomplete, and cleaning shall be repeated. Upon completion of any required recleaning, re-sampling with results to meet the above clearance criteria shall be done.

- EPA Transmission Electronic Microscopy (TEM) Method - EPA Method specified in 40 CFR 763 Appendix A. The abatement inside the regulated area is considered complete when the arithmetic mean asbestos concentration of the five inside samples is less than or equal to 70 structures per square millimeter (S/mm). When the arithmetic mean is greater than 70 S/mm, the three blank samples shall be analyzed. If the three blank samples are greater than 70 S/mm, resampling shall be done. If less than 70 S/mm, the five outside samples shall be analyzed and a Z-test analysis performed. When the Z-test results are less than 1.65, the decontamination shall be considered complete. If the Z-test results are more than 1.65, the abatement is incomplete, and cleaning shall be repeated. Upon completion of any required recleaning, resampling with results to meet the above clearance criteria shall be done.

Lead-based paint- LBP is defined by the EPA as any paint that contains more than 5,000 milligrams per kilogram (mg/kg or parts per million (ppm)) or 0.5 percent lead by weight. Department of Housing and Urban Development (HUD) *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* were used as a guideline for the development of the following clearance criteria.

Building Interior:
Floors - 40 micrograms/square foot (µg/sq ft).
Interior Window Sills - 250 µg/sq ft.
Window Troughs - 400 µg/sq ft.

During abatement or demolition, air monitoring and respiratory protection must be provided in accordance with 29 CFR 1926.62 if to prevent workers exposed to lead concentrations above the permissible exposure limit (PEL) of 50 micrograms/cubic meter (µg/m^3).

Waste that contains lead may be considered a hazardous waste, depending on the leachability of the lead. Lead that is leachable above a concentration of 5 milligrams/liter (mg/L) as determined using the Toxicity Characteristic Leach Procedure (TCLP) analysis is subject to Resource Conservation and Recovery Act (RCRA) hazardous waste handling and disposal requirements (40 CFR 261, Subpart C).

2.3 Laws & Regulations

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, HUD, EPA, Occupational Safety and Health Administration (OSHA), Texas laws, and the City of Texarkana laws and regulations. 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, ACM transport/disposal permits) will be obtained prior to the work commencing.

Asbestos – The TDSHS regulates asbestos abatement performed in Texas. Asbestos is a regulated substance and the following laws and regulations apply:

- AHERA - Although AHERA regulations apply to abatement in schools, the same standards are generally used for all abatement projects.
- Toxic Substances Control Act (TSCA) Section 6 – Regulates certain hazardous chemical substances including asbestos and authorizes EPA to take regulatory action to protect against the unreasonable risk of injury to human health or the environment.
- National Emission Standards for Hazardous Air Pollutants (NESHAP) Regulation 40 CFR Part 61, Subpart M - specify work practices for asbestos during demolitions and renovations of buildings. The regulations require the owner of the building or the operator to notify the appropriate state agency before any demolition, or before any renovations of buildings that could contain a certain threshold amount of asbestos or asbestos-containing material.
- Clean Air Act (CAA) (42 U.S. Code § 7401 et seq.) - EPA's responsibilities for protecting and improving the Nation's air quality and the stratospheric ozone layer and includes provisions for the EPA to set national emission standards for hazardous air pollutants, including asbestos.
- Texas Asbestos Health Protection Rules (TAHPR) -Texas Administrative Code, Title 25, Part 1 Chapter 295 Subchapter C – Texas Asbestos Health Protection – Regulations to control and minimization of public exposure to airborne asbestos fibers.
- Texas Occupational Code - Asbestos Health Protection Act – Title 12 Subtitle B Chapter 1954 – Provides health protection from asbestos.
- OSHA 29 CFR 1910.1001 - Asbestos General Standard—Specifies permissible exposure limits, engineering controls, worker training, labeling, respiratory protection, and disposal of asbestos waste.
- OSHA 29 CFR 1926.1101 - Asbestos Construction Standard—Covers construction work involving asbestos, including work practices during demolition and renovation, worker training, disposal of asbestos waste, and specification of permissible exposure limits.

Lead-based paint – The TDSHS regulates LBP abatement in Texas and is a regulated substance governed by the following laws and regulations: Texas Environmental Lead Reduction Rules (TELRR) – TDSHS.

- *EPA Guidance on Residential Lead-Based Paint, Lead-Contaminated Soil* (60 Federal Register 47248 (1995).
- OSHA Lead Construction Standard 29 CFR 1926.62 -Renovation/demolition regulations and permissible exposure limit for lead construction workers, including workers performing demolition, salvage, or renovation of a building.

Section 3

Evaluation of Cleanup Alternatives

The objective of the Project is to reduce exposure of asbestos and lead-based paint contamination at the Site. Prior to recommending the corrective action defined in Section 3.5, three cleanup alternatives were considered for the interior building cleanup of asbestos and LBP.

3.1 Asbestos and Lead-Based Paint Cleanup Alternatives

Asbestos and lead-based paint are the environmental concerns within the structures. Both were widely used when the parking garage was constructed, and when retail space was remodeled in the Former Texarkana National Bank building and the parking garage during the 60s and 70s. At the Former Texarkana National Bank building, asbestos is present on all floors and includes floor tile, mastic, fiber floor backing, floor coating, leveling compound, window glace, window caulk, ceiling tiles, ceiling/wall texture, acoustical wall tile, mastic of brick wall, thermal insulation, wrap insulation, tar wrap, cloth wrap, and sealant for wrap on fiberglass thermal system, as well as other materials. The property has been remodeled multiple times over the years and was all performed prior to borrower taking ownership.

At the parking garage asbestos is present in the exterior and interior aggregate cement panels, exterior plaster soffit, exterior building caulk, interior window caulk and building caulk, fiber backing of resilient sheet flooring, mastic of ceiling tile, wall texture/drywall/joint compound, thermal fitting insulation of foam pipe insulation, thermal pipe wrap, and in retail area, floor tile and mastic, button mastic interior building caulk grout on ceramic wall tile, thermal pipe insulation and thermal fitting insulation. Use of these materials took place prior to borrower taking ownership of the property. Lead-based paint is present on basement railing, on concrete and poles at lower garage entrance, concrete and metal beams, and on door a door frame on second floor of garage.

3.1.1 Alternative 1: No Action

Alternate 1 is to take no action. In this option, no cleanup would occur and the Former Texarkana National Bank/Capital One Building and Parking Garage would remain in the current state and continue to deteriorate.

The advantages of this alternative are:

- Low to moderate immediate cost

The disadvantages of this alternative are:

- Maintenance and security at the building is still required as the risk to human health remains for people entering the building, and as the building deteriorates the threat could migrate outside of the building. Exterior wall panels are falling from the building and could cause harm to people on the sidewalk and street
- Contamination including asbestos and LBP remains in place
- The building remains aesthetically unpleasant, a blight to the community
- The abandoned building would require security or a locked gate surrounding the property to deter trespassing
- The building cannot be redeveloped, resulting in a loss of tax base to the City

3.1.2 Alternative 2: Removal of Hazardous Materials and Demolition

Alternate 2 is to remove asbestos and LBP contaminated material to a level acceptable for demolition. Contaminated materials would be taken to a landfill that accepts ACM and LBP waste. The building would then be demolished.

The advantages of this alternative are:

- Asbestos and LBP paint will be safely removed from the Site and properly disposed. This prevents a future potential threat to human health and the environment.
- The Site can be redeveloped into any structure
- Boost in local economy with an increase in food and lodging for contracted work.

The disadvantages of this alternative are:

- The City would lose a historic landmark
- There is a high cost of demolition and disposal of building material
- There is the potential for exposure of environmental hazards during demolition, transport, and disposal of hazardous materials
- There would be a negative environmental impact with generation of a large amount of building material to be disposed in local landfills and heavy equipment noise and air emissions during the demolition

3.1.3 Alternative 3: Abatement of Hazardous Material and Renovation

Alternate 3 is to abate asbestos and LBP and then renovate the buildings into affordable housing, a boutique hotel, convention space, retail shops, office space, storage, and parking for the City's residents. This option includes abatement (a mixture removal/disposal, encapsulation, enclosure, encasement, and operations and maintenance) of asbestos-containing material, debris, and

furniture; decontamination of interior surfaces; and the removal of lead contaminated debris, building components, and flaking lead-based paint. To meet historic preservation goals, some surfaces may be partially stripped of LBP and sealed. Asbestos and lead abatement contractors would perform the abatement in accordance with applicable regulations.

The advantages of this alternative are:

- The Site can be redeveloped as downtown housing and commercial space
- The Former Texarkana National Bank/Capital One Building and Parking Garage remains as a historical landmark and a local attraction for the City
- The health hazards of asbestos and LBP are removed
- The ornate architectural details including marble, granite, and plaster moldings would be preserved; these details would be expensive to reproduce in a new structure
- This is in line with smart growth initiatives that encourage redevelopment of brownfields to revitalize neighborhoods, keep housing affordable, limit urban sprawl, and boost/tourist attraction as a registered landmark and unique shopping experience

The disadvantages of this alternative are:

- There is a moderate to high cost for the abatement and renovation activities
- There is a potential for exposure during abatement, transport and disposal of ACM and LBP waste.

3.2 Comparison of Asbestos and Lead-based Paint Alternatives

3.2.1 Effectiveness

Alternate 1: No Action

No Action is not effective in preventing the exposure to asbestos and lead-based paint. As the building continues to deteriorate, the potential for human and environmental exposure to Site contaminants will increase.

Alternative 2: Removal of Hazardous Materials and Demolition

This alternative is effective; however, it would destroy a historic building. Demolition of the building and off-site disposal of contaminated material would eliminate the threat to human health and the environment.

Alternative 3: Abatement of Hazardous Materials and Renovation

This alternative is effective and meets the Project goal. Abatement and proper off-site disposal of contaminated material will eliminate threat to human health and the environment.

3.2.2 Implementability

Alternate 1: No Action

No Action is moderately easy to implement since limited proactive activities will be conducted. Site controls would be necessary to limit people from entering the building and limit access near the building as the outside building panels may fall off and cause harm and/or property damage. As problems arise, such as falling panels, they may require emergency measures to cleanup and address the public concerns.

Alternative 2: Removal of Hazardous Materials and Demolition

This alternative is the most difficult to implement. The building is a historic eight-story structure in the center of a downtown area. Demolition would create a massive amount of building materials that would have to be disposed and may create environmental and human health risks during demolition. The asbestos would have to be abated prior to demolition so that it is not released to the environment during demolition activities.

Alternative 3: Abatement of Hazardous Materials and Renovation

This alternative is moderately difficult to implement but is a feasible option. Asbestos and lead abatement contractors often work in similar conditions and can adequately abate the contaminated material to provide a safe living environment.

3.2.3 Cost

Alternate 1: No Action

There would be low to moderate immediate cost for the no action alternative; but the long-term cost could be high. The structures in their current condition are hazardous due to panels falling off the buildings and potentially causing harm to people. Immediate cost includes securing the property from trespassers and limiting access near the building. Also, if the owner wants to maintain CERCLA liability protection under the Brownfields Act, he/she must exercise appropriate care in stopping the release of hazardous substances, prevent future releases, and prevent exposure to humans and the environment. Cost estimate $15,000 for security fencing and maintenance.

Alternative 2: Removal of Hazardous Materials and Demolition

The overall project cost for abatement and demolition is estimated at $1.5 million.

Alternative 3: Abatement of Hazardous Materials and Renovation

The overall project cost for abatement and renovation is estimated at $10 million.

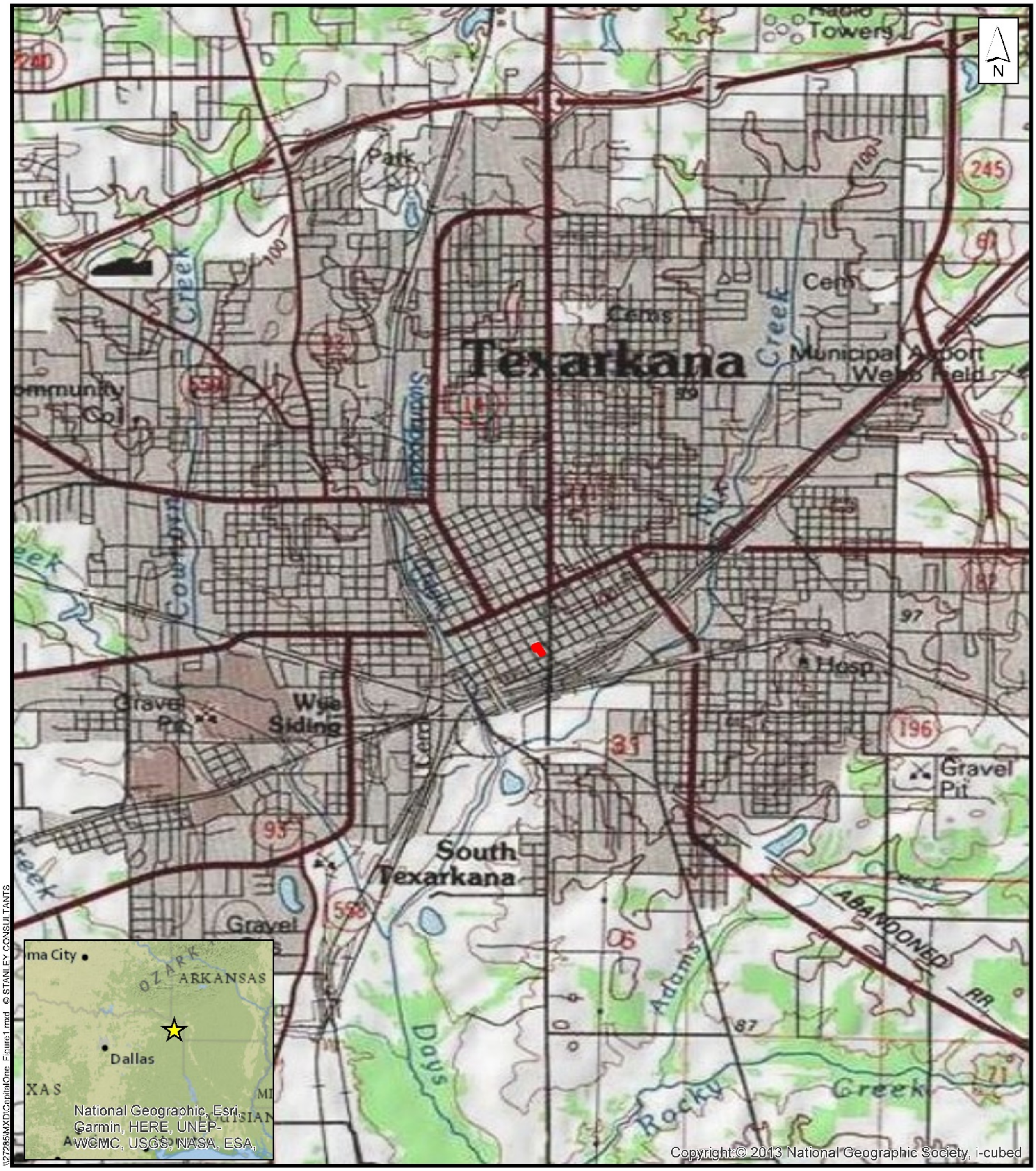
3.3 Recommended Alternatives

3.3.1 Asbestos and Lead-based Paint

The recommended cleanup alternative is Alternative #3: Abatement of Hazardous Materials and Renovation. Alternative #1: No Action cannot be recommended since it does not address Site risks to human health and the environment. Alternative #2: Removal of Hazardous Materials and Demolition, addresses the Site asbestos and LBP contamination; however, would result in the loss of a historical landmark and community housing and attractions. Alternate #3 meets the City's goals of removing environmental hazards to redevelop the Site into affordable housing and preserving a historical building. Additionally, Alternative #3 is aligned with smart growth initiatives that reuse brownfields Sites to revitalize neighborhoods and provide affordable housing while reducing urban sprawl. Alternative #3: Abatement of Hazardous Materials and Renovation is the recommended alternative.

Appendix A

Figures



0 0.25 0.5 1 1.5 Miles

Project 27285.01

Stanley Consultants INC.

Legend

Approximate Property Boundary

FIGURE 1
SITE LOCATION MAP
Former Capital One Building and
Eximus Parking Garage
100 Broad Street
Texarkana, TX 75501
August 2020

FIGURE 2
SITE DETAIL MAP
Former Capital One Building and
Eximus Parking Garage
100 Broad Street
Texarkana, TX 75501
August 2020