



October 16, 2014



Ms. Shirley Smith
Director of Environmental Compliance
City of New Orleans Office of Community Development
1340 Poydras St. 10th Floor
New Orleans, LA 70112

Re: Ready for Reuse Determination
Crescent Park
Mississippi River Levee Between Saint Phillip Street and Mazant Street
New Orleans, Louisiana (Orleans Parish)
LDEQ AI Number **167371**

Dear Ms. Smith:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Crescent Park in New Orleans, Louisiana (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgment that environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use.

The Crescent Park is located on the Mississippi River levee between Saint Phillip Street and Mazant Street in New Orleans, Louisiana (Orleans Parish). The site is located in a historical commercial/light industrial/residential district in New Orleans along the river front. It is approximately 40 acres in size and essentially comprises old wharf and/or warehouse structures with associated rail road tracks, asphalt access road, and spurs that serviced the area. Much of the site is covered in concrete or asphalt and a concrete floodwall traverses the northern portion of the site and generally outlines the northern extent of the site. The City of New Orleans is the current owner of the property.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that the City of New Orleans and the New Orleans Redevelopment Corporation have successfully conducted investigation, remediation and risk management activities, and the environmental conditions at the Property are protective of human health and the environment based on its current and anticipated future use as a community green space and commercial property. The Ready for Reuse Basis of Decision is provided as Enclosure 1 to this correspondence. Copies of relevant documents may be obtained from LDEQ at the addresses provided in Enclosure 2 to this correspondence.

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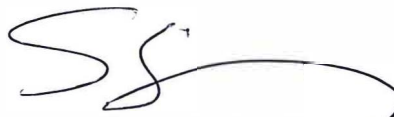
If conditions on the Property change (e.g., land use is altered or new site receptors are identified) or additional impacted media are discovered, the current owner/operator will notify LDEQ and it may become necessary to perform additional investigation and/or remediation to ensure continued protectiveness. The undersigned expressly reserve all rights and authorities to require further action by owners or operators if new or additional information is discovered that impacts this Ready for Reuse Determination, whether such information is known as of this date, or becomes available in the future.

Congratulations on this most noteworthy achievement!

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Peggy M. Hatch".

Peggy M. Hatch
Secretary
Louisiana Department of
Environmental Quality

A handwritten signature in blue ink, appearing to read "Susan G. Spalding".

Susan G. Spalding
Associate Director
RCRA Programs
U.S. EPA, Region 6

Enclosures

ENCLOSURE 1
READY FOR REUSE BASIS OF DECISION

CRESCENT PARK
NEW ORLEANS, LOUISIANA
LDEQ Area of Interest No. 167371

INTRODUCTION

The Louisiana Department of Environmental Quality (LDEQ) Underground Storage Tanks and Remediation Division (USTRD) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Crescent Park constructed by the City of New Orleans, in New Orleans, Louisiana (the Property) is Ready for Reuse. This facility meets the criteria for a Ready for Reuse Determination because its current environmental conditions are protective of human health and the environment based upon its current and/or anticipated future use as a multi-use recreational, cultural, and entertainment facility. A description of the Property, background information, a summary of investigation and risk management activities, and current conditions are provided in the following sections.

PROPERTY DESCRIPTION

The Crescent Park is located on the Mississippi River levee between Saint Phillip Street and Mazant Street in New Orleans, Louisiana (Orleans Parish). The site is located in a historical commercial/light industrial/residential district in New Orleans along the river front. It is approximately 40 acres in size and essentially comprises old wharf and/or warehouse structures with associated rail road tracks, asphalt access road, and spurs that serviced the area. It includes Mandeville and Piety wharves which were in various stages of disrepair and a vegetated batture between the Piety and Pauline Wharves. There are currently no active maritime operations on the wharves. Railroad tracks operated by the New Orleans Public Belt Railroad run parallel to the river along the northern portion of the site. Much of the site is covered in concrete or asphalt and a concrete floodwall traverses the northern portion of the site and generally outlines the northern extent of the site. The length of the park is approximately 1.3 miles. Site location map is included in Figure 1.

BACKGROUND INFORMATION

The Crescent Park is on the Mississippi River New Orleans frontage levee, a historically significant port area that dates back to the 1700s with the founding of New Orleans as a major port city for commerce along the Mississippi River. Movement of material up and down the Mississippi River depended on ever-increasing maritime and stevedoring operations along the Mississippi at New Orleans. Wharf and rail operations continued to expand during the 1800s and completion of a jetty system in 1880 enabled New Orleans to become the second largest port in the United States. Many commercial operations occurred in or around the subject property that were in support of or occurred as a by-product of shipping operations. Port activity decreased in the area of the Park with some wharves either catching on fire or falling into disuse. Wharf activity is still evident off the

western boundary of the Park and a single wall of an old wharf structure will be utilized in the operation of the park for historical impact and as a potential backdrop for showing movies.

ASSESSMENT AND REMEDIATION

Environ, Inc., on behalf of the City of New Orleans & New Orleans Redevelopment Corporation, conducted the assessment of the proposed Crescent Park in conformance with the National Environmental Policy Act (NEPA) environmental assessment requirements. These requirements are necessary when federal funds are used in connection with a proposed activity.

Samples of soil were taken in all areas of the proposed park that would be subject to public access. The proposed 1.3 mile long park was divided in to five areas and surface soil samples were collected for 69 potential constituents of concern, including metals, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), herbicides and pesticides, and total petroleum hydrocarbons. Only seven constituents exceeded the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Management Option 1 (MO-1) non-industrial soil screening standards (Soil_{ni}) at one or more locations in the park area. These constituents in the surface soil were either metals or PAHs and were all likely associated with numerous historical anthropogenic sources with non-specific commercial/industrial activity in the New Orleans area. The data did not indicate that a chemical release had occurred within the areas sampled/proposed for development.

In light of this information, the remedy selected was removal of the top six inches of soil in the proposed open, grassy, or otherwise vegetated areas followed by replacement with clean soil fill graded to final project elevations to form a soil cap. The soil cap serves a dual purpose of eliminating potential soil exposure pathways and meeting the required site elevation requirements.

Removal of soils was completed in accordance with the February 2010 Site Remedy Work Plan. In certain capped areas, a warning liner was placed underneath the soil cap to serve as a visual warning to any workers if future activities penetrate or compromise the soil cap. In addition, many areas of the park have protective coverings that were constructed as part of the park infrastructure such as concrete walkways. Existing impermeable structures such as asphalt or concrete paths were left in place. Approximately 198 tons of soil were excavated and hauled out to a permitted solid waste facility. Approximately 8,000 cubic yards of clean soil were placed in several areas of the park for soil replacement and capping as well as for adequate vegetation growth.

POST-CLOSURE MONITORING PROGRAM

The Crescent Park will be inspected on a semi-annual basis to ensure that the engineered areas of the soil remediation project remains intact. Surface coverings and vegetated areas will be assessed for erosion or otherwise uncovering of the soil cap layer. An annual monitoring report will be submitted to LDEQ that will provide a general description of the current property use, any changes since the last monitoring event, and verification that the existing soil cap is in place with no exposed areas. These tasks were incorporated into the Soil Remedy and Operations and Maintenance Plan (OMP) that will serve to guide the required maintenance activities.

CURRENT ENVIRONMENTAL CONDITIONS

As of the completion of this document, a majority of the Crescent Park structures have been completed. All work associated with surface soils had been completed and all landscaping is complete. The park is finished and in operation. Contact information for questions regarding the soil remediation of the Park is provided in Enclosure 2 to the Ready For Reuse Determination letter.

INTENDED FUTURE USE

The site was re-developed as a public park with a variety of uses. Improvements included landscaping, tree groves, pavilions and lawns, pedestrian piers and walkways, garden areas, lighting, restrooms, and associated amenities. A bridge was built for access across the railroad at the eastern end of the park. A warehouse was converted into a public venue facility for entertainment events on the western end. Parking lots and sidewalks were constructed as part of the access amenities. The Park will be owned and maintained by the City of New Orleans.

REFERENCES

Documents related to site assessment and remediation requirements are public records and are available through LDEQ's Electronic Document Management System (EDMS). EDMS can be accessed on the LDEQ Website under the EDMS icon. A list of documents supporting this Ready for Reuse Determination Basis of Decision is provided below:

- 2009 *Site Remedy Work Plan*; City of New Orleans & New Orleans Redevelopment Corporation; October 1, 2009 [EDMS Document No. 7644367]
- 2009 *Technical Comments of Site Remedy Work Plan*; LDEQ; December 11, 2009 [EDMS Document No. 6123034]
- 2010 *Site Remedy Work Plan-Amended*; City of New Orleans & New Orleans Redevelopment Corporation; February 3, 2010 [EDMS Document No. 6648310]
Site Remedy Work Plan Comments; LDEQ; February 17, 2010 [EDMS Document No. 6656208]
- 2011 *Site Remedy Work Plan Amendment*; City of New Orleans & New Orleans Redevelopment Corporation; December 12, 2011 [EDMS Document No. 8837158]
Site Remedy Work Plan Amendment – Approval; LDEQ; December 20, 2011 [EDMS Document No. 8224022]
- 2014 *Site Soil Remedy Confirmation Sampling Data, Preliminary Site Closure Documentation*; Environ International Corporation; January 22, 2014 [EDMS Documentation No. 9171181]

Response to *Preliminary Site Closure Documentation*; LDEQ; February 6, 2014 [EDMS Document No. 9177101]

Post Correction Action Report and Operations Maintenance Plan; Environ International Corporation; July 21, 2014 [EDMS Document No. 9398269]

Approval of *Post Correction Action Report and Operations Maintenance Plan*; LDEQ; August 5, 2014

ENCLOSURE 2
READY FOR REUSE AGENCY CONTACTS

CRESCENT PARK
NEW ORLEANS, LOUISIANA
LDEQ Area of Interest No. 167371

For a copy of the administrative record providing detailed information regarding environmental conditions at the Crescent Park, please contact:

Louisiana Department of Environmental Quality
Public Records Center
Galvez Building, Room 127
602 North Fifth Street
Baton Rouge, LA 70802
(225) 219-3168

For questions regarding the environmental conditions described in the Ready for Reuse Basis of Decision for the Crescent Park, please contact:

Mr. John Halk, CHMM
Senior Environmental Scientist
Underground Storage Tank and Remediation Division
Office of Environmental Compliance
Louisiana Department of Environmental Quality
Post Office Box 4312
Baton Rouge, LA 70821-4312
Telephone: (225) 219-3652
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