



May 20, 2014



Hilda Daigre Curry  
Mayor  
City of New Iberia  
457 East Main Street, Suite 300  
New Iberia, LA 70560

Re: Ready for Reuse Determination  
Timeless Treasures Site  
121 Bridge Street  
New Iberia, LA 70560 (Iberia Parish)  
LDEQ AI Number 73547

Dear Mayor Curry:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Timeless Treasures Site in New Iberia, 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. This Ready for Reuse Determination does not include off-site areas, where soil and groundwater contamination are known to exist.

The Timeless Treasures Site is located on the east side of Bayou Teche at 121 Bridge Street in New Iberia (Iberia Parish), Louisiana, and consists of approximately 0.31 acres (81 feet front on Bridge Street). The Property was a grocery store until the 1930s. Subsequently, it was used as a gas station/automotive repair shop between 1940-1978 and 1987-1989, and as an antique store between 1989-1990. After that time the building was vacant until it was demolished. In 1996, six underground storage tanks associated with the gas station (three 500-gallon tanks and three 1,000 gallon tanks) were removed. The City of New Iberia is the current owner of the property.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that the City of New Iberia has 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. Information concerning the current environmental conditions at the site and risk management activities to ensure protectiveness is summarized in Enclosure 2. Copies of

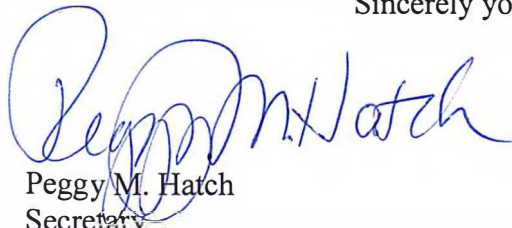
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relevant documents may be obtained from LDEQ at the addresses provided in Enclosure 3 to this correspondence.

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,



Peggy M. Hatch  
Secretary  
Louisiana Department of  
Environmental Quality



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

Enclosures

## **ENCLOSURE 1**

### **READY FOR REUSE BASIS OF DECISION TIMELESS TREASURES SITE NEW IBERIA, LOUISIANA LDEQ Agency Interest No. 73547**

#### **INTRODUCTION**

The Louisiana Department of Environmental Quality (LDEQ) Underground Storage Tank and Remediation Division (USTRD) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Timeless Treasures Site (the "Property") is Ready for Reuse. This facility meets the criteria for a Ready for Reuse Determination because the current environmental conditions on the Property are protective of human health and the environment based upon its current and anticipated future use as a community green space and commercial property. A description of the Property, background information, a summary of investigation and risk management activities, and current conditions are provided in the following sections. This Ready for Reuse Determination does not include adjacent off-site areas where soil and groundwater contamination are known to exist. These areas are still under assessment and site management by LDEQ.

#### **PROPERTY DESCRIPTION**

The Timeless Treasures Site is located at 121 Bridge Street in New Iberia, Louisiana (Iberia Parish) on the east side of Bayou Teche at Latitude 30°00'24.354" North, Longitude 91°48'56.887" West. The site consists of approximately 0.31 acres (81 feet front on Bridge Street). A detailed legal description of the area included in this determination may be found in the conveyance notification filed by the City of New Iberia with the Iberia Parish Clerk of Court on April 26, 2012. The site is surrounded by commercial and residential properties.

#### **BACKGROUND INFORMATION**

The site was a grocery store until the 1930s. Subsequently, it was a gas station between 1940-1978 and 1987-1989. It was also an automotive repair shop at times during these periods. The site was used as an antique store from 1989 to 1990. After that time, the building sat vacant until it was demolished. In 1996, the underground storage tanks (three 500-gallon tanks and three 1,000 gallon tanks) associated with the gas station were removed. The City of New Iberia is the current owner of the property.

Through the Acadiana Regional Development District (ARDD), assessments of the site were conducted using EPA Brownfields Assessment Grant funds. The clean-up was funded by an EPA Brownfields Clean-up Grant awarded directly to the City of New Iberia. LDEQ provided an oversight cost waiver under its CERCLA 128(a) Brownfields Grant.

## **SITE INVESTIGATION AND ASSESSMENT**

In January 1996, Environmental Sampling Inc. (ESI) identified six gasoline fuel tanks at the Property - three 500 gallon tanks and three 1,000 gallon tanks. Preliminary sampling of soil and groundwater at the time indicated contamination by gasoline constituents and a full scale assessment was recommended. LDEQ required an assessment of the site in a letter dated April 30, 1996. A proposed Scope of Services dated May 29, 1996 was submitted and subsequently approved by LDEQ on June 18, 1996. The tanks were disposed of on August 2, 1996 but the site remained under assessment.

On behalf of the US Army Corps of Engineers, GEC completed a Phase I Environmental Site Assessment on October 30, 2006. Leaaf Environmental LLC (Leaaf) submitted a Phase II Site Assessment Sampling Plan on behalf of the ARDD on June 14, 2007, which was approved by LDEQ on July 23, 2007. The resulting report, dated November 30, 2007, identified elevated concentrations of gasoline, benzene, ethylbenzene, toluene, and xylene in soil and groundwater that required additional investigation both on the site and in areas on the north and northwestern boundaries of the property.

On March 11, 2008, Leaaf, on behalf of ARDD, submitted a Voluntary Remediation Program (VRP) Complying Environmental Site Assessment Work Plan. Leaaf submitted an Addendum to the plan on March 31, 2008. LDEQ approved the plan and addendum on April 2, 2008. Leaaf submitted a VRP Complying RECAP Evaluation Submittal for the site on June 3, 2008. LDEQ identified deficiencies and provided them to Leaaf in a letter dated February 2, 2009. In May 2009, Leaaf, on behalf of the City of New Iberia, completed an All Appropriate Inquiry (AAI) - Phase I Environmental Site Assessment Report, and the City of New Iberia acquired the property.

Subsequent investigation included sampling and analysis of soil and groundwater for the entire site with a focus on the north and northwestern boundaries around the underground storage tanks, as well as other features that could have released contaminants. The results were submitted by Leaaf on behalf of the City of New Iberia in a revised Voluntary Remediation Action Plan, dated April 27, 2010. Conclusions based upon these results included identification of Constituents of Concern (COCs) in soil that exceeded the LDEQ Risk Evaluation/Corrective Action Program (RECAP) standards that were (1) protective of future use of the site for a commercial venture, (2) protective of human occupation of a future building on the site, and (3) protective of groundwater (classified as Groundwater 3 drinking water (GW3DW) in Bayou Teche). In addition, Leaaf identified constituents of concern in groundwater that exceeded RECAP standards protective of GW3DW in Bayou Teche.

## **REMEDIAL ACTION**

The Voluntary Remediation Action Plan (VRAP) submitted by Leaaf on behalf of the City of New Iberia on April 27, 2010 was accepted by LDEQ on May 18, 2010. Leaaf also

submitted a Quality Assurance Project Plan and a Health and Safety Plan with the VRAP. The documents were public noticed on May 28, 2010. LDEQ and the City of New Iberia executed a Partial Remediation Agreement for the Property on June 14, 2010. The agreement governed remediation, monitoring, responses to past environmental releases, and future use of the property. LDEQ approved the City's Voluntary Remediation Application on August 4, 2010.

For the remedial action, the City chose partial remediation of the site, which involved excavating the most highly contaminated soils on the property and capping the removal area. The remedy did not include remediation of groundwater. The remedy selection was driven by the proposed use of the property and the presence of a neighboring residential area.

In August 2010, the City completed concrete removal, soil excavation, backfilling, and capping. The City broke up the concrete across the entire site and transferred it to Diversified Materials LLC in St. Martinville, Louisiana for recycling. Approximately 344 tons of contaminated soil were excavated, transported, and disposed at Jeff Davis Landfill in Welsh, Louisiana. Confirmatory soil samples were collected from the side walls and bottom of the excavation (13-15 feet). The excavation was backfilled with 767 tons of clean fill to a level of one foot below ground surface.

Residual COCs were addressed by: (1) eliminating current and future exposure pathways using engineering and institutional controls, and (2) performing a risk assessment documenting that the remedy is protective of current and future uses of the property. A geomembrane was installed across the entire site to limit access to the remaining COCs and capped to grade with one foot of clean topsoil. Subsequently, certain areas of the site were also capped with five to eight inches of concrete paving to facilitate future development of the property. Further reduction of residual contamination at the site is being achieved but not monitored by phytoremediation by including tulip poplars among the trees selected for landscaping.

Because confirmatory soil concentrations exceeded the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Screening Standards, a RECAP Management Option 3 (MO-3) evaluation was performed to evaluate the risk from potential future on-site exposure. The following pathways were evaluated: (1) human exposure to soils in an industrial exposure scenario (SOILi); (2) human exposure to vapors migrating into an enclosed industrial structure (GWesi) and to ambient air from a groundwater source (GWair); and (3) human exposure to vapors migrating into non-industrial enclosed structures from both soil (SOILesni) and groundwater sources (GWesni). The COCs that exceeded the standards are listed in Enclosure 2. On December 8, 2010, the City submitted the MO-3 RECAP Evaluation Report, demonstrating that the potential risk to human receptors from residual site contaminants could be successfully managed using engineering and institutional controls. A resubmission of this report was approved by LDEQ on January 31, 2012. The City was directed to submit the Remedial Action Report for the site as the next phase in the VRP process. The City submitted the VRP Remedial Action Final Remediation Report, MO-3 RECAP Evaluation Report, on February 27, 2012. The

City submitted a supplemental report, Enclosed Space Calculations and RECAP Exceedances, on April 24, 2012, followed by a final revised version of the VRP Remedial Action Final Remediation Report, MO-3 RECAP Evaluation Report (Revision 01), dated April 26, 2012. LDEQ approved the report on May 8, 2012.

On April 26, 2010, the City filed a Conveyance Notification with the Iberia Parish Clerk of court identifying locations on the site where COCs still exceed concentrations for industrial/commercial use. The notification stated that the site was closed with contaminant levels present that are acceptable for the proposed use of the property as described in the LDEQ Voluntary Remediation regulations and provided a legal description of the property. The following use restrictions for the entire site were specified:

- (1) The site may not be used for residential purposes unless reevaluated through the LDEQ RECAP process.
- (2) Direct contact with soil underlying the concrete cap (sidewalk, walkway, and building slab) and green space cap (including underlying geomembrane) is prohibited, except as conducted pursuant to the Timeless Treasures Operations and Maintenance Plan (O&MP).
- (3) Activities that will extend below the concrete cap and green space cap will be prohibited, except as conducted pursuant to the O&MP, and institutional controls must be maintained according to the O&MP.
- (4) Enclosed structures pose a risk to occupants exists. Enclosed structures constructed in the future would require installation of a vapor mitigation system and LDEQ approval.

Institutional/engineering controls, including the concrete cap and green space cap, are illustrated in the scaled site plan provided as Exhibit B of the notification, and attached to this Enclosure as Figure 1. The maximum remaining chemical constituents in soil at concentrations that exceed industrial soil and groundwater limiting RECAP standards are included in the notification as Exhibit C and included in the Ready for Reuse determination in Enclosure 2.

LDEQ issued a Certificate of Completion for the Timeless Treasures Site to the City of New Iberia on October 17, 2012. The certificate provides an exemption from liability for prior discharges or disposal or threatened discharges or disposal of hazardous substances or hazardous wastes on the property and is subject to all the terms and conditions of the Partial Remediation Agreement including, but not limited to, compliance with all use restrictions and other institutional controls approved by LDEQ.

## CURRENT ENVIRONMENTAL CONDITIONS

A list of the maximum remaining concentrations of Constituents of Concern remaining in soil and groundwater can be found in Enclosure 2 (Environmental Conditions Table) to the Ready for Reuse Determination letter. Contact information for questions regarding the environmental conditions described in this Ready for Reuse Basis of Decision is provided in Enclosure 3 to the Ready for Reuse Determination letter.

## INTENDED FUTURE USE

The City of New Iberia intends to use the Property as a community green space with a mobile snowball stand, or similar short-term temporary use.

## REFERENCES

Documents related to the site investigations and remedial actions at the Timeless Treasures Site are public records and are available through LDEQ's Electronic Document Management System (EDMS). Contact information for obtaining access to these records is provided in Enclosure 3 to the Ready For Reuse Determination letter. A list of documents supporting this Ready for Reuse Determination Basis of Decision is provided below:

1996 *Summary Report*; Environmental Sampling Inc. (ESI); January 31, 1996 [EDMS Document No. 4584111]

*UST Removal Preparations and Preliminary Sampling Investigation*; Environmental Sampling Inc. (ESI); February 19, 1996 [EDMS Document No. 4584112]

*Site Assessment Request*; LDEQ; April 30, 1996 [EDMS Document No. 576845]

*Scope of Services for Site Assessment*; Environmental Sampling Inc. (ESI); May 29, 1996 [EDMS Document No. 576844]

*Proposed Assessment Work Plan Approval*; LDEQ; June 18, 1996 [EDMS Document No. 576843]

*Underground Storage Tank Closure/Assessment Form*; William C. Fullerton, Former Timeless Treasures; September 12, 1996 [EDMS Document No. 576842]

2006 *Phase I Environmental Site Assessment*; US Army Corps of Engineers; October 30, 2006 [Appendix J of EDMS Document No. 6464836]

2007 *Phase II Site Assessment Sampling Plan*; Leaaf Environmental LLC on behalf of Acadiana Regional Environmental Development District; June 14, 2007 [EDMS Document No. 7623589]

*Approval of Phase II Site Assessment Sampling Plan*; LDEQ; July 23, 2007 [EDMS Document No. 5833741]

*Phase II Environmental Site Assessment Report*; Leaaf Environmental LLC on behalf of Acadiana Regional Environmental Development District; November 30, 2007 [EDMS Document No. 5998191]

- 2008 *VRP Complying Environmental Site Assessment Work Plan*; Leaaf Environmental LLC on behalf of Acadiana Regional Environmental Development District; March 11, 2008 [EDMS Document No. 3417430]

*Addendum to VRP Complying Environmental Site Assessment Work Plan*; Leaaf Environmental LLC on behalf of Acadiana Regional Environmental Development District; March 31, 2008 [EDMS Document No. 3427092]

*Approval of VRP Complying Environmental Site Assessment Work Plan and Addendum*; LDEQ; April 2, 2008 [EDMS Document No. 3445061]

*VRP Complying RECAP Evaluation Submittal, Timeless Treasures*; Leaaf Environmental LLC on behalf of Acadiana Regional Development District Brownfields Program; June 3, 2008 [EDMS Document No. 3513935]

- 2009 *Notice of Deficiencies, VRP Complying RECAP Evaluation Submittal, Timeless Treasures*; LDEQ; February 2, 2009 [EDMS Document No. 6271858]

*All Appropriate Inquiry (AAI) - Phase I Environmental Site Assessment Report*; Leaaf Environmental LLC on behalf of City of New Iberia; May 1, 2009 [EDMS Document No. 6464836]

- 2010 *Former Timeless Treasures – Voluntary Remediation Action Plan*; Leaaf Environmental LLC on behalf of City of New Iberia; April 27, 2010 [EDMS Document No. 6773364]

*Acceptance of Revised Voluntary Remediation Action Plan*; LDEQ; May 18, 2010 [EDMS Document No. 2942396]

*Executed Partial Remediation Agreement, Timeless Treasures*; LDEQ; June 14, 2010 [EDMS Document No. 5487487]

*Approval of Voluntary Remediation Application*; LDEQ; August 4, 2010 [EDMS Document No. 6788948]



*MO-3 RECAP Evaluation, Timeless Treasures*; Leaaf Environmental LLC on behalf of City of New Iberia; December 8, 2010 [EDMS Document No. 7753740]

2012 *Final Approval of the MO-3 RECAP Evaluation Resubmittal Report*; LDEQ; January 31, 2012 [EDMS Document No. 8263722]

*Enclosed Space Calculations and RECAP Exceedances, Former Timeless Treasures*; LDEQ; April 24, 2012 [EDMS Document No. 8361297]

*Revised VRP Remedial Action Final Remediation Report (Revision 01)*; Leaaf Environmental LLC on behalf of City of New Iberia; April 26, 2012 [EDMS Document No. 8360919]

*Conveyance Notification, Timeless Treasures*; City of New Iberia; April 26, 2012 [EDMS Document No. 8366425]

*Approval of Voluntary Remedial Action Final Remediation Report*; LDEQ; May 8, 2012 [EDMS Document No. 8374663]

*Certificate of Completion, Timeless Treasures Site*; LDEQ; October 17, 2012 [EDMS Document No. 8579041]

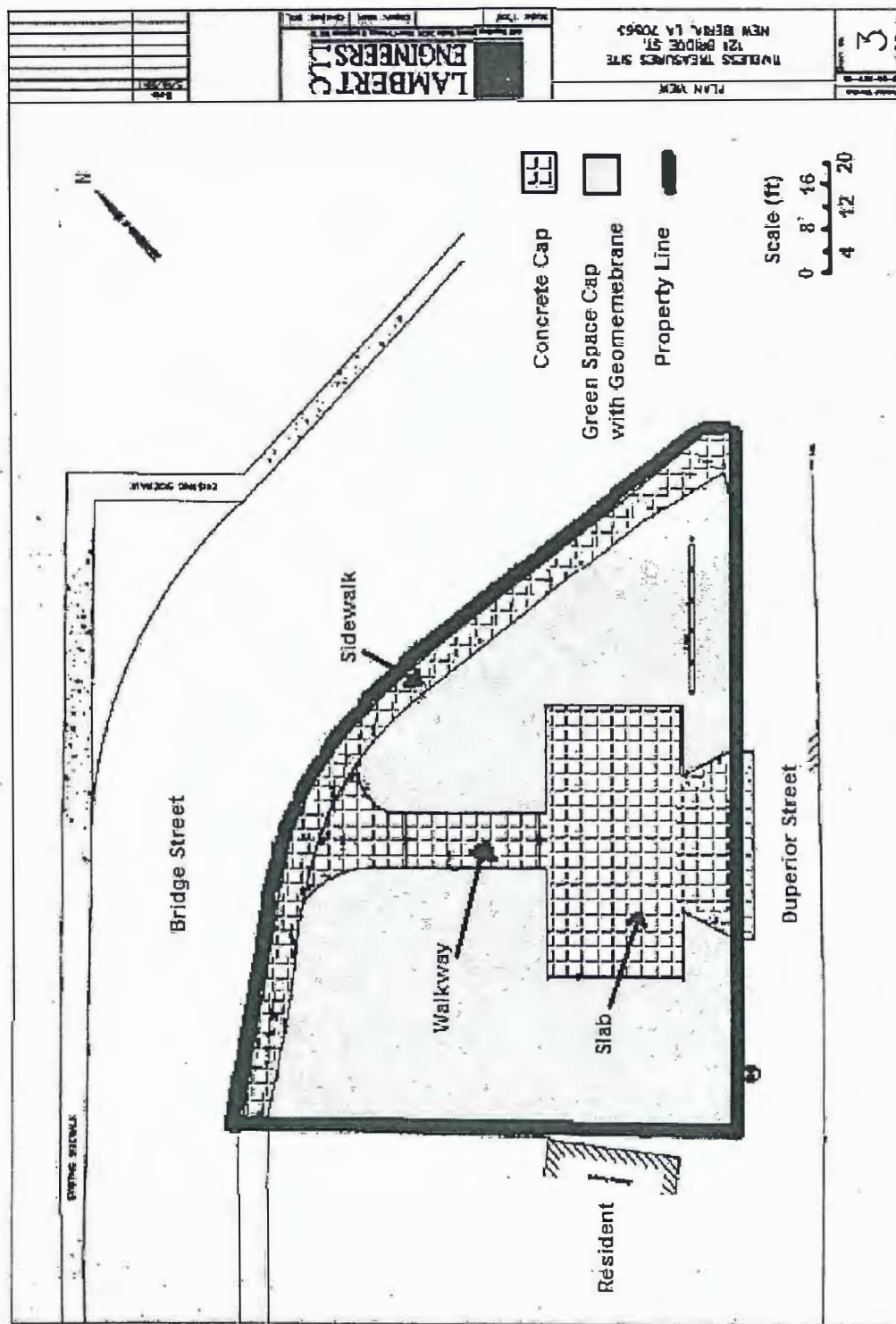


Figure 1. Concrete cap (sidewalk, walkway and building slab) and green space cap (with geomembrane) across entire site.

## ENCLOSURE 2

### ENVIRONMENTAL CONDITIONS TABLE TIMELESS TREASURES SITE, NEW IBERIA, LOUISIANA

Remedial Actions Taken	Constituents of Concern <sup>1</sup> and Maximum Levels Remaining in Soil and Groundwater		Limiting RECAP Standards	Location of Maximum Concentration	Clean-up Status	Institutional/ Engineering Controls
Removal of concrete with off-site disposal  Excavation of soil with off-site disposal  Capping of site with geomembrane, one foot thick layer of backfill, and five to eight inches of concrete paving	Soil	Benzene – 170 mg/kg (95% UCL <sup>2</sup> – 60 mg/kg)	1.25 mg/kg (SOIL <sub>esi</sub> )	C1-13-SA	LDEQ issued a Certificate of Completion for partial remediation to the City of New Iberia on 10/17/12	<u>Engineering controls:</u> capping with geomembrane, backfill and concrete  <u>Institutional controls:</u> Conveyance notification filed 04/26/12 in Iberia Parish; Operations and Maintenance Plan with use restrictions
		Ethylbenzene – 910 mg/kg (95%UCL – 459.8 mg/kg)	343 mg/kg (SOIL <sub>esi</sub> )	C1-13-S		
		Xylene (mixed/total) – 5,000 mg/kg (95%UCL – 2,260 mg/kg)	6.4 mg/kg (SOIL <sub>esi</sub> )	C1-13-S		
		Toluene – 2,100 mg/kg (95%UCL – 1,877 mg/kg)	10 mg/kg (SOIL <sub>esi</sub> )	C10-6-C		
		Vinyl chloride – 0.095 (<3.8) mg/kg	0.03 mg/kg (SOIL <sub>esi</sub> )	B6/8-12 (C1-13-SA)		
		Aliphatics C6-C8 – 7,700 mg/kg (95% UCL – 5,395 mg/kg)	64 mg/kg (SOIL <sub>esi</sub> )	C1-13-S		
		Aliphatics >C8-C10 – 2,400 mg/kg (95%UCL – 1904 mg/kg)	17.5 mg/kg (SOIL <sub>esi</sub> )	C1-13-S		
		Aromatics >C8-C10 – 4,200 mg/kg (95%UCL – 4,096 mg/kg)	45 mg/kg (SOIL <sub>esi</sub> )	C1-13-S		
		Benzo(a)pyrene – <0.45 mg/kg	0.33 mg/kg (SOIL <sub>i</sub> )	C8-15-S		
		Dibenz(a,h)anthracene – <0.36 mg/kg	0.33 mg/kg (SOIL <sub>i</sub> )	C8-15-S		
	Ground water	Aliphatics >C8-C10 – 0.96 mg/L	0.79 mg/L (GW <sub>esi</sub> )	MW2		
		Aliphatics>C10-C12 – 0.8 mg/L	0.55 mg/L (GW <sub>esi</sub> )	MW1		
Off-site Activities	Off-site soil and groundwater contamination were not fully assessed as part of this VRP action. These are still under assessment by LDEQ.					

<sup>1</sup> Constituents of Concern (COCs) are those contaminants present at a site at concentrations that exceed the RECAP Screening Standards.

<sup>2</sup> 95% Upper Confidence Limit

### **ENCLOSURE 3**

#### **READY FOR REUSE AGENCY CONTACTS TIMELESS TREASURES SITE, NEW IBERIA, LOUISIANA**

For a copy of the administrative record providing detailed information regarding environmental conditions at the Timeless Treasures Site, 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 Timeless Treasures Site, please contact:

Ms. Regina Atterberry Philson  
Underground Storage Tank and Remediation Division  
Office of Environmental Compliance  
Louisiana Department of Environmental Quality  
Post Office Box 4314  
Baton Rouge, LA 70821-4314  
(225) 219-3691  
[Regina.philson@la.gov](mailto:Regina.philson@la.gov)

or

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