FINDING OF NO SIGNIFICANT IMPACT

PROPOSED ACTION

The Proposed Action is to continue implementation of the Texas Commission on Environmental Quality (TCEQ) Response Action Plan (RAP) to remediate contamination located at the southern end of the 2005 gasoline pipeline release through soil vapor extraction (SVE). The release occurred within the Santa Fe Pacific Pipeline, Limited Partnership (SFPP, LP) easement, located 1 mile southeast of 11700 Railroad Drive along the pipeline trail road (Milepost 13.7, Line Section 17), on Fort Bliss in Texas (Figure 1 and 2, Environmental Assessment [EA]). The TCEQ first approved the RAP for the remediation of the full release in 2008. In 2014 it was determined that the RAP had successfully remediated the Chemicals of Concern (COCs) in the soils located at the southern end of the release. The RAP was revised to focus upon remediation of residual COCs in soils located at the northern end of the release. TCEQ approved the RAP revision in January 2016. The Proposed Action is to implement the TCEQ-approved RAP as revised January 2016 (Appendix A).

The COCs in the soils in the area are typical of gasoline and include volatile organic compounds, polycyclic aromatic hydrocarbons (PAHs), and Total Petroleum Hydrocarbons. Soils with residual COC concentrations exceeding critical Protective Concentration Levels (PCLs) are found between 5 and 39.5 feet below ground surface. Soils are permeable and well-suited to the proposed remediation via soil vapor extraction (SVE). There is no evidence of impacts to the regional ground water.

The SVE method removes COCs from the soils and destroys them using an all-electric catalytic oxidizer (ECAT). This method was used initially at the south end remediation. The proposed SVE/ECAT system requires three SVE wells (up to 50 feet deep), above-ground and underground piping to the blower system, the ECAT, a diesel generator, and a 1000-gallon above ground storage tank for diesel. The SVE/ECAT system would be located entirely within the existing SFPP, LP easement. The ECAT/SVE, generator, and above ground tanks would be housed in a gated compound within a 600-square-foot gated compound with an inner 8-foot high masonry wall reinforced with a 7.7-foot high earthen berm.

The SVE/ECAT system would be equipped with a digital interface providing real-time diagnostic information that would be monitored and controlled remotely. The facility would also be visited every two weeks for maintenance while in operation. Construction is expected to take two weeks and the system would be operated for an estimated three years to reduce soil COC contaminant concentrations below regulatory standards. Complete details can be found in the TCEQ-approved RAP in Appendix A.

The TCEQ approved a revision to the original RAP in January 2016. The revised RAP narrows the focus of the original RAP to the residual COCs present in the soils within the southern end of the release. Proposed Action will continue implementation of the RAP approved by the Texas TCEQ to remediate contamination resulting from the 2005 gasoline pipeline release.

NO ACTION ALTERNATIVE

Under the No Action Alternative, the SVE/ECAT system would not be installed and the residual gasoline in the soil would be allowed to naturally attenuate. Natural attenuation of the residual subsurface impact would require 15 years or more to reduce contaminant concentrations in soil within the pipeline release area to below regulatory standards. The No Action Alternative would violate TCEQ
directives to complete the approved remediation response and is therefore not the selected option for this project.

SUMMARY OF ENVIRONMENTAL RESOURCES AND IMPACTS

The decision to be made is to implement the TCEQ-approved RAP, which includes setup and operation of an SVE/ECAT system for three years, to reduce the remaining gasoline in the soil to acceptable levels, or to leave the gasoline in the soil and let it attenuate naturally. Implementation of the Proposed Action, with the construction and operation of the SVE/ECAT system would result in no significant adverse environmental impacts and minimal impacts on existing land use. The potential for minor impacts from soil erosion or fugitive dust generation during construction can be effectively mitigated through implementation of standard construction control measures for erosion and dust control. The proposed SVE/ECAT would require permit by rule for air emissions. The Proposed Action would have significant beneficial impacts on soils, water quality, and safety by reducing residual soil contaminant concentrations to levels below the critical PCLs.

CONCLUSION

Based on the analysis of the Proposed Action and the mitigation measures presented in the EA, it is concluded that the impacts of the Proposed Action would not significantly affect the human or natural environment on Fort Bliss or the surrounding area. It is further concluded that the Proposed Action would impose no direct or indirect effects that cannot be mitigated or that could contribute to cumulative effects requiring preparation of an Environmental Impact Statement. Therefore a Finding of No Significant Impact (FNSI) is warranted.

Steve O. Murphy  
Colonel, U.S. Army  
Commanding  

18SEP17  
Date