

DRAFT ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES – PRELIMINARY EVALUATION
2525 OSAGE ROAD
GATESVILLE, TX 76528

I. INTRODUCTION AND BACKGROUND

a. Site Location

The site is located at 2525 Osage Road in Gatesville, TX (herein referred to as “the Site”).

b. Previous Site Use and any Previous Cleanup/Remediation

The Site was the former location of the Rotunda Nursing Home. The structure was constructed incrementally on 2.5 acres with the main building (the Rotunda) built in 1968 and subsequently three connecting wings were added in 1970, 1971, and 1973, extending outward from the center rotunda. All buildings were single-story, wood-framed, brick-veneered structures originally totaling approximately 47,500 square feet. The facility operated under different owners between 1968 and 2000. In 2000, the property owner (Jewel Enterprises) went into foreclosure, and in 2004 the property was conveyed to Grace Assembly Church. A tax foreclosure sale was conducted by the Coryell County (TX) Sheriff’s Office and on December 8, 2008 the property was conveyed to the City of Gatesville in lieu of unpaid taxes.

The facility was condemned by the Gatesville City Council in May 2008 as a result of previous roof/ceiling collapses. In 2014 and 2015, the City funded asbestos abatement and demolition of two wings, but lacked the funding to complete the remaining main structure and remaining one wing. Only the main building and one wing remain, totaling 25,150 square feet. Over time, the building continued to significantly physically deteriorate as parts are open to the elements, resulting in an eyesore and health hazard to the neighborhood. The City of Gatesville applied unsuccessfully for EPA Brownfields Cleanup Grants in 2010, 2012, 2013 and 2019.

c. Site Assessment Findings

Upon request by the City, EPA Region 6 and the Army Corps of Engineers conducted an ASTM 1527-05 Phase I and a Phase II environmental site assessments for asbestos-containing materials and lead based paint in April 2010. The Phase II targeted brownfields assessment identified 172,700 square feet of textured walls/ceilings; 30,505 square feet of flooring; and 24,000 square feet of roof mastic containing non-friable asbestos (Note: these numbers pertain to the entire structure prior to the demolition of the two wings. Total square footage of ACMs remaining in place after demolition of the two wings amounts to 93,386 ft²). No lead-based paint or any other contaminants were identified.

d. Project Goal (Site Reuse Plan)

The planned reuse for the Site is to abate the remaining asbestos-containing materials, and demolish the remaining structures in order to construct a multipurpose municipal building to house the City of Gatesville’s Police Department and City Hall on the property. The current

Police Station facility is sixty years old; it was constructed as the business office of the local Lone Star Gas Company and was acquired by the City in 1996 to meet the growing space needs of the Police Department. Today, given additional growth of the Police Department, there is a significant shortage of evidence storage space, interview rooms, and dedicated space for department functions such as Patrol, Code Enforcement, and Animal Control. The current City Hall was constructed in 1938 (82 years old) and fails to meet most health/safety Code standards. In August of 2020, an engineering firm determined that the structural integrity of the Rotunda building is compromised to the point where it is in imminent danger of collapse. Rehabilitation/remodeling of the building will not be possible. The Site is currently zoned Community Facility which meets all requirements for the proposed reuse.

II. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

a. Cleanup Oversight Responsibility

Cleanup oversight will be through the Texas Department of State Health Services and cleanup activities will be conducted by a qualified asbestos contractor licensed by the Texas Department of State Health Services. As the Texas Commission on Environmental Quality's (TCEQs) does not regulate ACMs, enrollment in TCEQs Voluntary Cleanup Program is neither required, nor possible.

b. Cleanup Standards for Major Contaminants

All asbestos containing materials (ACMs) will be removed.

c. Laws and Regulations Applicable to the Cleanup

Laws and regulations that are applicable to the cleanup include: Texas Occupations Code, Chapter 1954 – Asbestos Health Protection; Texas Administrative Code, Chapter 295, Subchapter C – Texas Asbestos Health Protection; Texas Department of State Health Services, TCS 4477-3A and amendments; 40CFR, Part 61 – National Environmental Standards for Hazardous Air Pollutants (NESHAP); worker safety is addressed under OSHA 29 CFR 1910.1200 and OSHA 29 CFR 1926.1101; and proper notification to the Texas Department of State Health Services prior to start of activities.

III. EVALUATION OF CLEANUP ALTERNATIVES

a. Cleanup Alternatives Considered

To address asbestos contamination at the Site, three different alternatives were considered:

- Alternative #1: No Action
- Alternative #2: Abatement with Offsite Disposal
- Alternative #3: Abatement by Wet Demolition with Offsite Disposal

b. Effectiveness

Alternative #1: No Action is ineffective in controlling or preventing the exposure of receptors to asbestos contamination at the Site. The building will decay further and continue to be a hazard to the neighborhood.

Alternative #2: Abatement with Offsite Disposal would be an effective way to eliminate risk at the Site as ACMs will be removed and exposure will no longer exist. The structure was, however, declared in danger of imminent collapse and it is not be safe for cleanup personnel to enter the structure and perform abatement procedures inside this structure.

Alternative #3: Abatement by Wet Demolition with Offsite Disposal. The facility was condemned by the Gatesville City Council in May 2008 as a result of previous roof/ceiling collapses. On August 12, 2020, ABACUS Engineering conducted an on-site inspection to assess the structural integrity and general condition of the structure. The engineer noted that the structure “is a significant hazard to those who enter as the structural integrity of the entire building is severely compromised” and that “this building is in imminent danger of collapse and it needs to be demolished and removed”. Based on this assessment, ACM abatement by wet demolition is the only viable and effective cleanup option.

c. Implementability

Alternative #1: No Action is the easiest alternative to implement since no actions to abate or demolish will be conducted.

Alternative #2: Abatement with Offsite Disposal cannot be implemented as the remaining building is not structurally sound enough to safely conduct abatement activities.

Alternative #3: Abatement by Wet Demolition with Offsite Disposal is the only safe option as significant structural integrity issues were identified during the inspection on August 12, 2020. The ACMs will be kept adequately wet and disposed of in a landfill operated in accordance with 40CFR61.154. The city will procure an ACM abatement contractor licensed by the Texas Department of State Health Services. Procurement will follow EPA guidelines.

d. Cost

There will be no costs associated with Alternative #1: No Action

Alternative #2: Abatement with Offsite Disposal. It is estimated that abatement costs will be \$320,000 based upon estimates received in September 2020 from qualified firms.

Alternative #3: Abatement by Wet Demolition with Offsite Disposal, is estimated to cost \$210,000 based upon estimates from qualified contractors received in October 2020.

e. Extreme Weather Resilience

As a city located at a significant distance from the Texas Gulf Coast, Gatesville will not be directly impacted by hurricanes, although subsequent rainfall rates have increased when those hurricanes have made landfall in Texas. Alternative #1 will be impacted by increased rainfall rates associated with hurricanes as the deteriorated building is particularly vulnerable to rainfall and wind because of gaping holes in the roofs and structure. The building could potentially collapse and the ACMs become more friable, presenting an even more pronounced hazard to the neighborhood. Hypothetically, Alternative #2 would be impacted the same way as the building would be left standing, however, this alternative is not feasible because of the structural defects of the building. Alternative #3 will not be impacted by extreme weather events.

The site is outside any federally-designated floodplain, requiring no additional provisions to mitigate flood risk for the intended site reuse.

III. Proposed Cleanup Alternative

The proposed cleanup alternative is Alternative #3: Abatement by Wet Demolition with Offsite Disposal. Alternative #1: No Action cannot be recommended since it does not address site risks and will continue to be a visual blight to the community. Alternative #2: Abatement with Offsite Disposal is not feasible in light of the lack of structural integrity of the building; Alternative #3: Abatement by Wet Demolition with Offsite Disposal is the only safe cleanup alternative for this site.