

4.10 Special Waste

Various databases were examined to locate known or potential contamination from regulated substances near the build alternatives. Information used for this analysis was obtained from known federal, state and local environmental databases, which are described below. The databases represent historical records of known special waste sites, spills, or enforcement actions. A Special Waste Assessment (SWA) will be completed in Tier Two to better characterize the likelihood of involvement with special waste sites and determine whether a Preliminary Environmental Site Assessment (PESA) is required. Because right-of-way may be acquired and building demolition and utility relocation would be required, a PESA most likely would be required in Tier Two.

A broad risk assessment was applied to the types of sites encountered. Risks to human and environmental health and estimated cleanup costs were considered. Special waste sites were placed in the following categories:

- **High Risk.** Active Comprehensive Environmental Response, Compensation, Liability Act (CERCLA) sites and Toxics Release Inventory (TRI) sites using volatile organic compounds (VOCs) and engaged in enforcement action or that formerly had hazardous waste processing activity onsite.
- **Moderate Risk.** Archived CERCLIS sites (except those with a No Further Remediation Action Planned designation); RCRA large-quantity generators; leaking UST (LUST) sites not reclassified as non-LUST; Site Remediation Program (SRP) sites; TRI sites using VOCs with no known violations; UST sites; and landfills.
- **Low Risk.** CERCLIS sites with No Further Remediation Action Planned designation; RCRA small-quantity or conditionally exempt generators; LUST sites redesignated as Non-LUST sites; and other TRI sites with no enforcement action.

The database search revealed that each alternative could potentially encounter special waste sites during construction. The potential impacts each build alternative and south bypass connection option would have on such sites are described in the following subsections and shown in Exhibit 4-10.

4.10.1 Hazardous Waste Sites

One active CERCLIS site within the footprint of Alternatives 203 and 402 is considered a high risk site. Two archived CERCLIS sites are within the footprints of Alternatives 203 and 402. They have received a “No Further Remediation Action Planned” status and are characterized as low risk. An archived CERCLIS site is within the footprint of both Options A and D. The site has a “No Further Remediation Action Planned” designation and is characterized as low risk. Nine additional active CERCLIS sites are located within one mile of Alternative 203, and eight are within one mile of Alternative 402. Nineteen additional archived CERCLIS sites are within one mile of Alternatives 203 and 402. One additional Active CERCLIS site is within one mile of Options A and D. Nine more archived CERCLIS sites are within one mile of Options A and D.

4.10.2 Nonhazardous Sites

Alternatives 203 and 402 could affect nonhazardous waste sites in each of the categories listed in Table 4-27, many of which are common to both alternatives. Table 4-27 lists the number of nonhazardous waste sites within the footprints of both alternatives. Alternatives 203 and 402 would involve the same number of high risk sites. Alternative 203 would affect one more RCRA large-quantity generator and four more USTs than Alternative 402. Alternatives 203 and 402 would affect the same number of LUST, TRI, and SRP sites and landfills categorized as moderate risk. Both alternatives would affect the same number of low-risk sites. Although Alternative 203 would affect one more RCRA small quantity or conditionally exempt generator than Alternative 402, Alternative 402 would affect one more LUST site reclassified as non-LUST than Alternative 203. Another 177 LUST sites are within 1,000 feet of Alternative 203; 123 LUST sites are within 1,000 feet of Alternative 402. The preliminary review of readily available special waste information for the alternatives found that Alternative 203 would have slightly greater involvement of special waste sites than Alternative 402.

TABLE 4-27
Nonhazardous Waste Sites within the Build Alternative and South Bypass Connection Option Footprints

| | Alternative 203 | Alternative 402 | Option A | Option D |
|--|--------------------|--------------------|-------------|-------------|
| High Risk Sites | | | | |
| TRI sites using VOCs and undergoing enforcement action or formerly had hazardous waste processing activity on site | 2 | 2 | 0 | 0 |
| Moderate Risk Sites | | | | |
| RCRA large-quantity generators | 2 | 1 | 0 | 0 |
| LUST sites not reclassified as non-LUST | 19 | 19 | 12 | 9 |
| TRI sites using VOCs but not engaged in enforcement action | 5 | 5 | 0 | 2 |
| USTs | 100 | 96 | 22 | 30 |
| Landfills | 1 | 1 | 0 | 0 |
| SRP sites | 1 | 1 | 0 | 1 |
| Low Risk Sites | | | | |
| RCRA small quantity or conditionally exempt generators | 49 | 48 | 15 | 16 |
| LUST sites reclassified as non-LUST | 1 | 2 | 0 | 1 |
| Other TRI sites not engaged in enforcement action | 1 | 1 | 2 | 2 |

Options A and D would also potentially involve non-hazardous waste sites, many of which are common to both options. The number of non-hazardous waste sites within the footprints of Options A and D are identified in Table 4-27. Neither option impacts a high risk site. Option A would affect three more moderate risk LUST sites than Option D. Option D would affect eight more USTs than Option A. Option D impacts two TRI sites categorized as moderate risk and one SRP site, whereas Option A does not impact any. Option D would impact two more low risk sites than Option A, specifically one more low risk RCRA site and one more low risk LUST site. Forty-two additional LUST sites are within 1,000 feet of Option A; 42 additional LUST sites are within 1,000 feet of Option D. The preliminary review of the available special waste data for the area found that Option D potentially

impacts more special waste sites than Option A (i.e., eight more moderate risk sites, two more low risk sites). Regardless of the option selected, further evaluation will take place in Tier Two.