

**United States General Services Administration**

Hebbronville Border Patrol Station – Hebbronville, Texas  
Phase I ESA Report



**EXECUTIVE SUMMARY**

**Hebbronville Border Patrol Station  
1312 W. Harald Street  
Hebbronville, TX 78361**

Tetra Tech, Inc. (Tetra Tech) has completed a Phase I Environmental Site Assessment (ESA) of the Hebbronville Border Patrol Station (HBPS) located at 1312 W. Harald Street, Hebbronville, Texas (Site), for the benefit of the United States (U.S.) General Services Administration (GSA). The project scope-of-work was designed and executed to assess the potential for recognized environmental conditions (RECs) associated with the Site.

The environmental assessment was conducted based on the methods and procedures described in the ASTM International (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E 1527-13) modified to meet GSA specific standards.

The Site consists of an approximate 0.48 acre parcel of land improved with three structures. The Site contains a 3,140-square foot structure formerly used as a Border Patrol office. This building is constructed of concrete cinder block and brick exterior and composite roof and was constructed in the late 1950s. This building contains a main room, storage room, holding cell, bathroom, and utility room. This structure is used mainly for storage. The second structure located on the Site is constructed of metal siding and a metal roof and is approximately 1,694 square feet. This building contains a kitchenette, bathrooms, closets, offices and a main room. This building is being used as office space for law enforcement personnel. The third building is an approximate 1,000-square foot garage that contains two storage rooms. Interior finishes in the garage consist of linoleum floors, wooded walls and drop ceilings. This building is currently being used for miscellaneous storage space by Jim Hogg County. In addition to these three structures, there is a storage shed located on the Site that consists of a wooden exterior and composite roof. Some water staining and damaged ceilings were observed within the original Border Patrol office and the metal building located on-site. With the exception of the damaged ceilings and water damage observed within two of the on-site buildings, the buildings appeared generally in good condition at the time of the Site reconnaissance.

The Phase I ESA identified the following findings at the Site:

- On the 1957 aerial photograph, the Site appears to be undeveloped or agricultural land. The Site may have previously been historically utilized as agricultural land and herbicides and pesticides may have been used during normal farming practices on site. The normal use and application of agricultural chemicals generally does not trigger enforcement actions, assessments by regulatory agencies, or the recommendation for further assessment of the Site unless there is evidence that indicates that misuse, dumping, or improper storage of chemicals is present or has occurred. There are no indications of the presence of on-site

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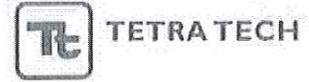


agricultural chemical mixing areas or that chemical dumping or improper storage has occurred.

- One pole-mounted transformer was observed in the southwestern portion of the Site. No labeling indicating polychlorinated biphenyl (PCB) content was observed on the transformer. No evidence of leaks or staining was observed on the transformer, and the transformer is not anticipated to represent an environmental concern at the Site.
- Evidence of water damage was observed on the drop ceiling panels of the original Border Patrol building during the Site reconnaissance. The areas of water staining are considered to be a de minimis condition, and is therefore not considered a REC to the Site. Additional evidence of mold was not observed in any of the three buildings located at the Site. The water damage in the buildings is considered a Business Environmental Risk (BER).
- Based on the construction date of the original Border Patrol building (late 1950s), it is possible that asbestos- containing material (ACM) is located on the Site. ACM is considered a concern for the Site. If renovation or demolition occurs at the Site, an asbestos Operations & Maintenance Plan should be prepared and submitted for the Site and positive ACMs should be removed or managed in accordance with federal, state and local regulations.
- Based on the date of construction of the original Border Patrol building located onsite, it is possible the building may contain lead-based paint (LBP). A LBP survey should be completed at the Site to determine LBP quantities at the Site. In addition, if renovation or demolition activities occur at the Site, LBP should be abated and disposed of in accordance with federal, state and local regulations.
- Compact Fluorescent Light (CFLs) ballasts were observed throughout the drop ceilings within the three on-site buildings. The bulbs appeared to be in good condition at the time of Site reconnaissance. The bulbs are considered a BER for the Site.
- The U.S. Environmental Protection Agency (USEPA) has classified Jim Hogg County, Texas as being located within the USEPA Radon Zone 3, with indoor average radon levels less than 2 picoCuries per Liter (pCi/L). Based on information provided by the GSA, radon testing has not been conducted at the Site. The USEPA Radon residential threshold value for radon in indoor air is 4 pCi/L. According to the EDR report, one facility was tested in the 78361 zip code with radon observed under 2 pCi/L in the first floor living area. Based on the results of this testing, the lack of a basement at the Site buildings and the non-residential usage of the Site, radon is not considered a concern for the Site.

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- Evidence of an out of use, 500-gallon gasoline underground storage tank (UST) was observed at the west side of the garage structure located on the Site. The gasoline UST is reportedly empty and not currently being used. The on-site 500-gallon UST is considered a REC.
- During the Site reconnaissance, Tetra Tech observed minimal hazardous materials within the metal building at the Site that consisted of general household cleaning supplies. No leaks or stains were observed and Tetra Tech does not consider the use or storage of these household cleaning supplies to be a REC.



## 1.0 INTRODUCTION

Tetra Tech, Inc. (Tetra Tech) was retained by the United States (U.S.) General Services Administration (GSA) to perform a Phase I Environmental Site Assessment (ESA) for the former Hebbronville Border Patrol Station (HBPS) building located at 1312 W Harald Street, Hebbronville, Texas (Site) (Figure 1). Tetra Tech was authorized to conduct this Phase I ESA under the GSA Contract Number GS-00P-14-CY-A-0002 and Award Number GS-P-07-15-UD-5007. Ms. Krista Jack, a Tetra Tech Environmental Scientist, performed the site visit on April 22, 2015. Access to the Site was granted by Judge Humberto Gonzalez with Jim Hogg County. It is Tetra Tech's understanding that the GSA has performed these environmental activities in preparation for divestiture of the property.

The purpose of the assessment was to identify potential environmental issues due to current and historical activities conducted on or near the Site and to qualify for a Landowner Liability Protection (LLP) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). During the site inspection, environmental conditions of the Site and neighboring properties were noted. Additional information used to evaluate the Site was obtained from historical and regulatory agency sources. The environmental assessment was conducted based on the methods and procedures described in the ASTM International (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E 1527-13). Information regarding the site inspection is presented below:

Date of site inspection: April 22, 2015.

Name of Tetra Tech staff that performed site inspection: Ms. Krista Jack.

Name(s) of Site representatives providing information during site inspection: Judge Humberto Gonzalez, and Mr. Javier Zambrano, Jim Hogg County Personnel.

At the time of the site inspection, the Site status was: one parcel totaling approximately 0.48 acres developed with an original 3,140-square foot Border Patrol office, an approximate 1,694-square foot metal building that is currently used as an office by Jim Hogg County law enforcement personnel, an approximate 1,000- square foot garage and a small storage shed. The Site is currently being occupied by Jim Hogg County law enforcement personnel.

### 1.1 LIMITATIONS/RELIANCE

This report was compiled based partially on information supplied to Tetra Tech from outside sources and other information in the public domain. The conclusions and opinions herein are based on the information Tetra Tech obtained in compiling the report. Tetra Tech makes no warranty as to the accuracy of statements made by others that may be contained in the report, nor are any other warranties or guarantees, expressed or implied, included or intended by the report, except that it has been prepared in accordance with the current generally accepted practices and standards consistent with the level of care and skill exercised under similar circumstances by other professional consultants or firms performing the same or similar services. Because the facts forming

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the basis for the report are subject to professional interpretation, differing conclusions could be reached. Tetra Tech does not assume responsibility for the discovery and elimination of hazards that could possibly cause accidents, injuries, or damage. Compliance with submitted recommendations or suggestions does not ensure elimination of hazards or the fulfillment of client's obligations under local, state, or federal laws or any modifications or changes to such laws. None of the work performed hereunder shall constitute or be represented as a legal opinion of any kind or nature, but shall be a representation of findings of fact from records examined.

Estimates and professional opinions of this potential are based upon information derived from the site reconnaissance and from other activities described herein. The GSA is herewith advised that the conditions observed by Tetra Tech are subject to change. Indicators of the presence of hazardous substances and petroleum products that were not indicated or observable at the time of the most recent site reconnaissance may subsequently become present or observable.

Tetra Tech has generally used the standard of care recommended by Standard E 1527-13 developed by ASTM and modified to meet client specific standards. Because these standards of care only set forth minimums, any additional services and service enhancements that the U.S. GSA has authorized are contained in the scope of services.

Representatives for the GSA are the only parties that have been involved in shaping the scope of services needed to satisfactorily manage risks from the GSA's point of view; therefore, the GSA is the only intended beneficiary of this report. Reliance on this report by parties other than the GSA may result in reliance on assumptions whose extent and nature could distort the meaning and impact of the estimates given in this report. As such, no party, except the GSA, should rely upon estimates for the potential of hazardous materials to exist at the Site. With the consent of the GSA, Tetra Tech is available to work with other parties in developing probability estimates, given other parties unique risk management concerns. The guidelines used to define hazardous substances and petroleum products were obtained from the ASTM Standard of Practice E 1527-13. For the purposes of this report, the vicinity of the Site is defined as properties located within an approximately one-eighth mile radius of the Site.

This ESA does not include a radon survey, lead paint sampling, a comprehensive asbestos survey, or wetland delineation. This ESA report is based on information obtained from a variety of usually reliable sources, which are listed in the report. Tetra Tech does not guarantee the authenticity or reliability of the information it has received from outside sources.

This report is not a comprehensive site characterization and should not be construed as such. This report presents opinions that are based on the findings of visually observable on-site and off-site conditions, a review of specific regulatory records and historical sources, and comments made by interviewees. ESAs, by their very nature, are limited. Tetra Tech has endeavored to meet the applicable standard of care and in so doing, is advising the GSA of the ESA limitations. Tetra Tech believes this information is essential to help the GSA identify and manage risks. These risks can be reduced, but cannot be completely eliminated through additional research. Tetra Tech will, upon

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request, advise the GSA of the additional research opportunities available, their impact on risk, and their cost.

**1.2 PURPOSE**

The goal of this ESA is to identify whether RECs, controlled RECs (CRECs), historical RECs (HRECs), or *de minimis* conditions are present on the Site. RECs are the presence or likely presence of any hazardous substances or petroleum products on a Site under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into structures on the Site or into the ground, groundwater, or surface water of the Site. CRECs are the result of a past release of hazardous substances or petroleum products that have been addressed to the satisfaction of the applicable regulatory authority. HRECs are a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The terms include hazardous substances or petroleum products, even under conditions in compliance with laws. The terms are not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies (Section 1.1.1 E 1527-13, ASTM 2013).



## 2.0 SITE LOCATION AND DESCRIPTION

The Hebbbronville Border Patrol Station is located at 1312 W. Harald Street, Hebbbronville, Texas (Figure 1). Figure 2 shows the layout of the Site and surrounding areas and Figure 2 shows the layout of the three on-site buildings. The owner of the Site is identified as owned by Jim Hogg County, a local government unit which acquired the property on June 2, 2005 from the United States of America.

Table 1 below summarizes information obtained regarding the Site. Copies of select Site photographs are included in Appendix A.

Table 1: Summary of the Site

Address	Year Building Built (approx.)	Building Sizes (square feet)	Lot Size (acre)	Building Description	Occupied
1312 W. Harald Street	Original building constructed late 1950s	3,140	Approximately 0.48 acres	An original Border Patrol office, metal building, garage and storage shed	Yes
	Metal building constructed late 2000s	1,694		Metal building used as office space and storage space	Yes
	Wooden building constructed late 1990s	1,000		Wooden storage shed utilized for storage space	Yes

The Site consists of a 3,140-square foot structure formerly used as a Border Patrol office. This building is constructed of concrete cinder block and brick exterior and composite roof and was constructed in the late 1950s. This building contains a main room, storage room, holding cell, bathroom, and utility room. This structure is used mainly for storage. The second structure located on the Site is constructed of metal siding and a metal roof and is approximately 1,694 square feet. This building contains a kitchenette, bathrooms, closets, offices and a main room. This building is being used as office space for law enforcement personnel. The third building is an approximate 1,000-square foot garage that contains two storage rooms. Interior finishes in the garage consist of linoleum floors, wooded walls and drop ceilings. This building is currently being used for miscellaneous storage space by Jim Hogg County. In addition to the structures, there is a storage shed located on the Site and consists of a wooden exterior and composite roof. Some water staining and damaged ceilings were observed within the original Border Patrol office and the metal building

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located on-site. With the exception of the damaged ceilings and water damage observed within two of the on-site buildings, the buildings appeared generally in good condition at the time of the Site reconnaissance.

**2.1 TOPOGRAPHY**

According to the United States Geological Survey (USGS) 7.5-minute series, 1985, Falfurrias, Texas Topographic Quadrangle Map, the Site is located at approximately 570 feet above mean sea level (msl).

**2.2 SURFACE WATER/WETLANDS**

The Site was inspected for potential wetlands and water bodies. For purposes of this report, potential wetlands include areas that are saturated with water or covered by shallow water and support hydrophytic vegetation (cattails, fern, bald cypress, etc.). Wetlands do not include constructed drainage ditches and retention ponds that are maintained for the purpose of storm water or wastewater control. A wetlands delineation study was not included in the scope-of-work for the Phase I ESA.

Potential wetlands were not observed on the Site. According to the U.S. Fish and Wildlife Service's Online Wetlands Mapper (<http://www.fws.gov/wetlands/Data/Mapper.html>) and National Wetland Inventory (NWI), the Site is not listed in a Federal or State designated wetland area. The closest wetland is identified between one-half and one mile southwest of the Site associated with Norlacitas Creek. The Site is not identified in a 100- or 500-year floodplain.

A permanent body of water and/or other standing water was not observed on the Site. The closest major water feature is Norlacitas Creek located approximately 0.60 miles southwest of the Site.

**2.3 AREA GEOLOGY AND SOILS**

Tetra Tech used Geoscheck® - Physical Setting Source Summary, provided by Environmental Data Resources, Inc. (EDR®) and the 1992 Geologic Map of Texas (USGS 1992 and Texas Geological Survey 2014), to determine the geology of the area. The Site is identified as overlying the Goliad Formation physiographic region. This physiographic region is characterized by Miocene which includes variegated sandstone, silt and clay.

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service's (NRCS) Web Soil Survey (WSS) Jim Hogg County, Texas ([websoilsurvey.nrcs.usda.gov](http://websoilsurvey.nrcs.usda.gov)), native soils in the vicinity of the Site primarily consist of Delmita complex. The Delmita complex consist of nearly level to gently sloping and gently undulating, moderately deep fine sandy loams and loamy fine sands. Most of the Delmita complex is used for range suited for wildlife range for livestock and deer, and is also suited for irrigated crops. The Delmita complex have a surface layer of yellowish-red and reddish-brown neutral fine sandy loam and deep fine sands. Depth to water is greater than 80 inches (USGS 1996).

## 2.4 AREA HYDROLOGY AND HYDROGEOLOGY

The site is underlain by the Carrizo-Wilcox Aquifer. The Carrizo-Wilcox Aquifer is a major aquifer extending from the Louisiana border to the border of Mexico in a wide band adjacent to and northwest of the Gulf Coast Aquifer. It consists of the Wilcox Group and the overlying Carrizo Formation of the Claiborne Group. The aquifer is primarily composed of sand locally interbedded with gravel, silt, clay, and lignite. Although the Carrizo-Wilcox Aquifer reaches 3,000 feet in thickness, the freshwater saturated thickness of the sands averages 670 feet (USGS Groundwater Atlas 1996).

According to the EDR Radius report, 69 state wells were identified within a mile radius of the Site. No USGS wells were identified within a mile radius of the Site. Historical groundwater elevation data obtained by the USGS, well TXMON2000004464, located in Jim Hogg County approximately 1 mile northeast of the Site, exhibited groundwater levels ranging from 8 to 265 below ground surface (bgs) (EDR 2015a).

### 3.0 SITE OWNERSHIP AND USE

Information pertaining to the historical nature of the Site was obtained through Environmental Database Resource (EDR).

#### 3.1 SITE OWNERSHIP

According to the EDR Chain of Title report, included in **Appendix G**, the Site is currently owned by Jim Hogg County, a local government unit which acquired the property on June 2, 2005 from the United States of America. According to the EDR report, no environmental liens or AULs are associated with the Site.

#### 3.2 SITE USE - HISTORICAL

General information regarding the historical use of the Site was obtained from a review of available historical documents and interviews with Judge Humberto Gonzalez, personnel of Jim Hogg County. According to historical information, the Site was developed with the original Border Patrol office building in the late 1950s. Two additional structures were constructed sometime prior to 1995. The GSA utilized the Site from the time of the construction of the original Border Patrol office in the late 1950s until the Site was purchased by Jim Hogg County in 2005. Jim Hogg County law enforcement personnel utilizes the buildings located on the Site for storage space and offices for law enforcement personnel.

Historical documents reviewed to gather information about historical site use included:

- Historical aerial photographs;
- Historical topographic maps;
- Historical City Directories; and,
- Other historical information provided by GSA.

#### Historical Aerial Photographs

Nine (9) aerial photographs of the property dated 1957, 1967, 1983, 1995, 2004, 2005, 2006, 2010 and 2012 were obtained from EDR® (EDR 2014b). Copies of the aerial photographs are included in **Appendix C**. The aerial photographs show that the Site was not developed with a structure prior to 1957. Two additional structures were observed on the Site on the aerial photographs spanning from 1995 and 2012. Prior to the 1967 aerial photograph, the Site appears to be undeveloped or agricultural land as observed on the 1957 aerial photograph. The potential historical usage of the Site as agricultural land may have included herbicides and pesticides used during normal farming practices on site. The normal use and application of agricultural chemicals generally does not trigger enforcement actions, assessments by regulatory agencies, or the recommendation for further assessment of the Site unless there is evidence that indicates that misuse, dumping, or improper

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storage of chemicals is present or has occurred. There are no indications of the presence of on-site agricultural chemical mixing areas or that chemical dumping or improper storage has occurred. Accordingly, Tetra Tech does not consider the historical use of the Site as agricultural land as an environmental condition which warrants further assessment.

The surrounding areas in the vicinity of the Site generally appear to be to be developed with agricultural land or residential properties in the 1957 aerial photograph. In the remaining aerial photographs dated 1957, 1967, 1983, 1995, 2004, 2005, 2006, 2010 and 2012 the areas in the vicinity of the Site appear to be developed with residential properties. Agricultural land is located to the far west of the Site. No RECs were observed in association with the historic use of the Site and surrounding areas during the review of the aerial photographs.

Historical Topographic Maps

Four (4) historical USGS topographic maps were obtained from EDR® (EDR 2014d). The maps, dated 1917, 1931, 1967 and 1985 are included in **Appendix D**. The maps dated 1917 and 1931 are USGS 30-minute maps depicting the Hebbronville, Texas quadrangle; the maps dated 1967 and 1985 are USGS 15-minute maps depicting the Hebbronville, Texas quadrangle. The maps indicate that the Site is located at approximately 570 feet above msl. Due to the relatively small size of the Site and the scale of the 30-minute topographic maps, conditions of the Site could not be determined for the topographic maps dated 1917 and 1931. The topographic map dated 1967 depicts the Site with three small buildings. The surrounding areas are depicted on the 1914, 1948 and 1950 topographic maps with undeveloped land in each direction with the exception of the south which includes a paved roadway. The areas in the vicinity of the Site are depicted as containing various small structures. The area to the far west of the Site is shaded indicating urban development in the area. No RECs were observed in association with the historic use of the Site and surrounding areas during the review of the topographic maps.

Historical Fire Insurance Maps

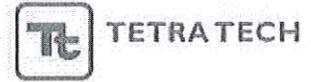
Historical Fire Insurance Maps were requested from EDR® (EDR 2014c); however, coverage was not available for the Site. The No Coverage notice is included in **Appendix E**.

Historical City Directories

Historical City Directories were obtained from EDR® (EDR 2014e). Polk's City Directory was searched for the following years; 1992, 1995, 1999, 2003, 2008 and 2013, and is included in an EDR summary report in **Appendix F**. The Site address was not identified in the city directories dated 1992, 1995, 1999, 2003 and 2013 searched by EDR®. The addresses for properties in the vicinity of the Site, along W. Harald Street are listed under various residential tenant names. The historic use of the Site and surrounding properties, in Tetra Tech's opinion, do not appear to represent RECs for the Site.

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**3.2 SITE USE - CURRENT**

The Site is currently owned by Jim Hogg County, a local government unit which acquired the property on June 2, 2005 from the United States of America. Jim Hogg County utilizes the Site for storage and offices for law enforcement personnel.

## 4.0 SITE INSPECTION

**Section 4.0** describes general site observations from the April 22, 2015 Site visit. Photographs of selected Site features were taken during the Site visit. Copies of select Site photographs are included in **Appendix A**.

### 4.1 SITE BUILDINGS AND GROUNDS

The Site is located at 1312 W. Harald Street, Hebbronville, Texas (**Figures 1, 2 and 3**). The Site consists of three stand-alone structures. The Site consists of a 3,140-square foot structure formerly occupied as a Border Patrol office. This building is constructed of concrete cinder block and brick exterior and composite roof and was constructed in the late 1950s. This building contains a main room, storage room, holding cell, bathroom and utility room. This structure is used mainly for storage by Jim Hogg County law enforcement personnel. The second structure located on the Site is constructed of metal siding and a metal roof and is approximately 1,694 square feet. This building contains a kitchenette, bathrooms, closets, offices and a main room. This building is being used as office space and storage for Jim Hogg County law enforcement personnel. The third building is an approximate 1,000-square foot garage that contain two storage rooms. Interior finishes in the garage consist of linoleum floors, wooded walls and drop ceilings. This building is currently being used for miscellaneous storage space by Jim Hogg County law enforcement personnel. In addition to these three structures there is a storage shed located on the Site and consists of a wooden exterior and composite roof. Some water staining and damaged ceilings were observed within the original Border Patrol office and metal building. With the exception of the damaged ceilings and water damage observed within one of the on-site buildings, the buildings appeared generally in good condition at the time of the Site reconnaissance. The remainder of the Site consists of grass-covered areas and asphalt-paved areas.

### 4.2 UTILITY AREAS, HEATING, VENTILATING AND AIR CONDITIONING SYSTEM

The structures located on the Site have a split system heating, ventilation, and air conditioning (HVAC) system consisting of a roof-mounted air conditioning unit and a natural gas forced air furnace. Potable water and sewer services are provided by Jim Hogg County Water District. Electricity is supplied via overhead cables and provided by American Electric Power. Natural gas is also provided to the Site by Transamerican Natural Gas Co.

### 4.3 DRYWELLS/STORM DRAINS

No drywells were identified in the vicinity of the Site. Storm drains were identified along the northern portion of the paved parking area and are reportedly connected to the Jim Hogg County municipal storm water system. Tetra Tech did not observe issues in association with the storm drains or depression area located on the Site.

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**4.4 SURFACE WATER, PITS/PONDS/LAGOONS**

No surface water bodies, pits, ponds or lagoons were observed on the Site during Site reconnaissance. The closest water body to the Site is Norlacitas Creek located approximately 0.60 mile southwest of the Site.

**4.5 SURFACE STAINING**

No staining was observed that would pose a REC to the Site during site reconnaissance.

**4.6 STRESSED VEGETATION**

No areas of stressed vegetation were observed during the site reconnaissance.

**4.7 STORAGE TANKS**

No aboveground storage tanks (ASTs) were observed during the site reconnaissance. Evidence of an underground storage tank (UST) was observed in the northwest portion of the Site during the site reconnaissance. More specifically, Tetra Tech observed a fill port that is connected to a 500-gallon UST formerly containing gasoline. In addition, Tetra Tech observed a gasoline dispenser located on a concrete island. This UST was reportedly empty and out of use. Based on a Suction Tank & Line Test Report conducted by Three 5 Seven Leak Detection Services for the U.S. Border Patrol on June 5, 2005, the suction tank and line for the UST located on the Site met the Texas Commission on Environmental Quality and the United States Environmental Protection Agency's Requirements. However, based on a letter from the Texas Commission on Environmental Quality dated February 24, 2014, and a second letter dated November 7, 2014, the Site did not report compliance with the Petroleum Storage Tank (PST) Underground Storage Tank facility Operator Training requirements. According to the letters the Site does not have at least one trained operator in each of the three defined operator classes. Documents related to the UST on the Site are included in **Appendix H**. The on-site UST is considered to be a REC.

**4.8 SITE RECORDS**

The metal building located on the Site is occupied by Jim Hogg County for law enforcement personnel and the remaining two buildings located on the Site are also occupied by Jim Hogg County for storage. Limited records were available to Tetra Tech during completion of this Phase I ESA. Records which were reviewed are discussed in pertinent sections of this report.

**4.9 WASTEWATER**

The Site building has reportedly been connected to the Jim Hogg County Public Utilities since the original building construction in the late 1950s. No wastewater was being generated at the time of Site reconnaissance, and no evidence of mishandling of wastewater was observed.

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### 4.10 Electrical Transformers and Equipment

USEPA Code of Federal Regulations (CFR) Title 40, Part 761, governs the manufacturing, processing and distribution of PCBs. The guideline defines a PCB transformer as any transformer that contains 500 parts per million (ppm) PCBs. PCB-Contaminated Electrical Equipment is defined as “any electrical equipment including, but not limited to, transformers (including those used in railway locomotives and self-propelled cars), capacitors, circuit breakers, reclosers, voltage regulators, switches (including sectionalizers and motor starters), electromagnets, and cable, that contain PCBs at concentrations of 50 ppm and < 500 ppm in the contaminating fluid.”

Electricity was supplied to the Site by overhead lines. One pole-mounted transformer was observed at the southwestern corner of the Site. No labeling indicating PCB content was observed on the transformer. No evidence of leaks or staining was observed on the transformer, and the transformer is not anticipated to represent an environmental concern at the Site.

### 4.11 PESTICIDE AND HERBICIDE USE

On the 1957 aerial photograph, the Site appears to be undeveloped or agricultural land. The Site may have previously been historically utilized as agricultural land and herbicides and pesticides may have been used during normal farming practices on site. The normal use and application of agricultural chemicals generally does not trigger enforcement actions, assessments by regulatory agencies, or the recommendation for further assessment of the Site unless there is evidence that indicates that misuse, dumping, or improper storage of chemicals is present or has occurred. There are no indications of the presence of on-site agricultural chemical mixing areas or that chemical dumping or improper storage has occurred. Accordingly, Tetra Tech does not consider the historical use of the Site as agricultural land as an environmental condition which warrants further assessment. Tetra Tech does not consider the former potential use of herbicides and pesticides to be a REC.

### 4.12 INDOOR AIR

#### Mold

Evidence of water damage was observed on the drop ceiling panels of the original Border Patrol building during the Site reconnaissance. The areas of water staining are not considered a REC to the Site. Additional evidence of mold was not observed in any of the three buildings located at the Site. The water damage observed is considered a Business Environmental Risk (BER).

#### Radon Gas

Radon gas is a colorless, odorless gas that occurs naturally from the breakdown of uranium. Radon can be found in high concentrations where there are soils and rocks containing high levels of uranium, granite, shale or phosphate. In open air or in areas with high air circulation, radon is not considered a health problem. However, in confined spaces (such as poorly ventilated basements), radon can concentrate and become a health hazard.

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The USEPA has classified Jim Hogg County, Texas as being located within the USEPA Radon Zone 3, with indoor average radon levels less than 4 picocuries per Liter (pCi/L). Based on information provided by the GSA, radon testing has not been conducted at the Site.

The USEPA Radon residential threshold value for radon in indoor air is 4 pCi/L. According to the EDR report, one facility was tested in the 78361 zip code with radon observed under 2 pCi/L on the first floor living area. Site-specific radon testing has not been conducted at the Site according to historical information. Based on the results of this testing, the lack of a basement at the Site buildings, and the non-residential usage of the Site, radon is not considered a concern for the Site.

No potential hazard dust or material that might affect the indoor air quality was observed during the site reconnaissance. Therefore, indoor air is not anticipated to be a concern at the Site.

**4.13 RADIOACTIVE MATERIALS**

GSA personnel and the Site contact were not aware of permitted radiological activities or materials at the Site. No information obtained indicated radioactive material use or storage within the neighboring properties. Therefore, radioactive materials are not a concern associated with this Site.

**4.14 ASBESTOS**

Based on the construction date of the original Border Patrol building (late 1950s), it is possible that asbestos-containing material (ACM) is located on the Site. ACM is considered a concern for the Site. If renovation or demolition occurs at the Site, an asbestos Operations & Maintenance Plan should be prepared and submitted for the Site and positive ACMs should be removed or managed in accordance with federal, state and local regulations.

**4.15 LEAD-BASED PAINT**

Based on the date of construction of the original Border Patrol building located onsite, it is possible the building may contain lead-based paint (LBP). Tetra Tech observed peeling paint at each of the buildings located on-site. A LBP survey should be completed at the Site to determine LBP quantities at the Site. In addition, if renovation or demolition activities occur at the Site, LBP should be abated and disposed of in accordance to federal, state and local regulations.

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**5.0 REGULATORY REVIEW**

**5.1 RECORDS REVIEW**

Various State and Federal lists that identify properties with confirmed or possible contamination, facilities that generate hazardous wastes, sites with USTs, and properties involved in Federal enforcement actions were reviewed to assess the environmental status of the Site. **Table 2** presents a summary of the information provided by EDR® (EDR 2014a) for the Site. The complete Environmental EDR® Report is provided in **Appendix B**.

**Table 2. Environmental EDR® Report Summary**

Database Reference	EDR® Search Radius (miles)	Site	Surrounding/ Adjoining Properties
NPL	1.00	Not Listed	0 Listed
Proposed NPL	1.00	Not Listed	0 Listed
NPL LIENS	TP	Not Listed	0 Listed
Delisted NPL	1.00	Not Listed	0 Listed
CERCLIS	0.500	Not Listed	0 Listed
FEDERAL FACILITY	0.500	Not Listed	0 Listed
CERC-NFRAP	0.500	Not Listed	0 Listed
CORRACTS	1.000	Not Listed	0 Listed
RCRA-TSDF	0.500	Not Listed	0 Listed
RCRA-LQG	0.250	Not Listed	0 Listed
RCRA-SQG	0.250	Not Listed	0 Listed
RCRA-CESQG	0.250	Not Listed	0 Listed
US ENG CONTROLS	0.500	Not Listed	0 Listed
US INST CONTROL	0.500	Not Listed	0 Listed
LUCIS	0.500	Not Listed	0 Listed
ERNS	TP	Not Listed	0 Listed
SHWS	1.000	Not Listed	0 Listed
SWF/LF	0.500	Not Listed	0 Listed
LUST	0.500	Not Listed	0 Listed
INDIAN	0.500	Not Listed	0 Listed
LUST UST	0.250	Not Listed	0 Listed
AST	0.250	Not Listed	0 Listed
INDIAN UST FEMA	0.250	Not Listed	0 Listed
UST	0.250	Not Listed	1 Listed
TANKS	0.250	Not Listed	0 Listed
AUL	0.500	Not Listed	0 Listed
INDIAN	0.500	Not Listed	0 Listed
VCP BROWNFIELDS	0.500	Not Listed	0 Listed
US BROWNFIELDS	0.500	Not Listed	0 Listed

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Table 2. Environmental EDR® Report Summary (Continued)

Database Reference	EDR® Search Radius (miles)	Site	Surrounding/ Adjoining Properties
ODI	0.500	Not Listed	0 Listed
DEBRIS REGION 9	0.500	Not Listed	0 Listed
SWRCY	0.500	Not Listed	0 Listed
INDIAN ODI	0.500	Not Listed	0 Listed
HIST LF	0.500	Not Listed	0 Listed
US CDL	TP	Not Listed	0 Listed
SRS	0.500	Not Listed	0 Listed
DEL SHWS	1.000	Not Listed	0 Listed
CDL	TP	Not Listed	0 Listed
US HIST CDL	TP	Not Listed	0 Listed
HMIRS	TP	Not Listed	0 Listed
SPILLS	TP	Not Listed	0 Listed
AGSPILLS	TP	Not Listed	0 Listed
RCRA NonGen/NLR	0.250	Not Listed	0 Listed
DOT OPS	TP	Not Listed	0 Listed
DOD	1.000	Not Listed	0 Listed
FUDS	1.000	Not Listed	0 Listed
CONSENT	1.000	Not Listed	0 Listed
ROD	1.000	Not Listed	0 Listed
UMTRA	0.500	Not Listed	0 Listed
US MINES	0.250	Not Listed	0 Listed
TRIS	TP	Not Listed	0 Listed
TSCA	TP	Not Listed	0 Listed
FTTS	TP	Not Listed	0 Listed
HIST FTTS	TP	Not Listed	0 Listed
SSTS	TP	Not Listed	0 Listed
ICIS	TP	Not Listed	0 Listed
PADS	TP	Not Listed	0 Listed
MLTS	TP	Not Listed	0 Listed
RADINFO	TP	Not Listed	0 Listed
FINDS	TP	Not Listed	0 Listed
RAATS	TP	Not Listed	0 Listed
RMP	TP	Not Listed	0 Listed
MN LS	0.500	Not Listed	0 Listed
DRYCLEANERS	0.250	Not Listed	0 Listed
ENF	TP	Not Listed	0 Listed
AIRS	TP	Not Listed	0 Listed
BEA	0.500	Not Listed	0 Listed
INDIAN RESERV	1.000	Not Listed	0 Listed

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**Table 2. Environmental EDR® Report Summary (Continued)**

Database Reference	EDR® Search Radius (miles)	Site	Surrounding/ Adjoining Properties
MDA	0.250	Not Listed	0 Listed
LIS	0.250	Not Listed	0 Listed
2020 COR ACTION	TP	Not Listed	0 Listed
PRP	TP	Not Listed	0 Listed
WIMN	0.500	Not Listed	0 Listed
AGVIC	0.500	Not Listed	0 Listed
EPA WATCH LIST	TP	Not Listed	0 Listed
US FIN ASSUR	TP	Not Listed	0 Listed
PCB TRANSFORMER	TP	Not Listed	0 Listed
COAL ASH	0.500	Not Listed	0 Listed
COAL ASH DOE	TP	Not Listed	0 Listed
COAL ASH USEPA	0.500	Not Listed	0 Listed
Financial Assurance	TP	Not Listed	1 Listed
EDR MGP	1.000	Not Listed	0 Listed
EDR US Hist Auto	0.250	Not Listed	0 Listed
Stat	0.250	Not Listed	0 Listed

**Notes:**

- 2020 COR ACTION = 2020 Corrective Action Program List
- AGSPILLS = Department of Agriculture Spills
- AGVIC = Agricultural Voluntary Investigation & Cleanup Listing
- AIRS = Permit Contact List
- AST = Aboveground Storage Tanks
- BROWNFIELDS = Petroleum Brownfields Program Sites
- BULK = Bulk Facilities Database
- CDL = Clandestine Drug Labs
- CERCLIS = Comprehensive Environmental Response, Compensation, and Liability Information System
- CERC-NFRAP = CERCLIS No Further Remedial Action Planned
- COAL ASH DOE = Steam-Electric Plant Operation Data
- COAL ASH USEPA = Coal Combustion Residues Surface Impoundments List
- COAL ASH = Coal Ash Disposal Site Listing
- CONSENT = Superfund (CERCLA) Consent Decrees
- CORRACTS = Corrective Action Report
- Delisted NPL = National Priority List Deletions
- DOD = Department of Defense Sites

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DOT OPS = Incident and Accident Data  
DRYCLEANERS = Registered Drycleaning Facilities  
EDR MGP = EDR Proprietary Manufactured Gas Plants  
EDR US Hist Auto Stat = EDR Exclusive Historic Gas Stations  
EDR US Hist Cleaners = EDR Exclusive Historic Dry Cleaners  
ENF = Generators Associated with Enforcement Log  
EPA WATCH LIST = EPA WATCH LIST  
ERNS = Emergency Response Notification System  
FEDERAL FACILITY = Federal Facility Site Information listing  
FEMA UST = Underground Storage Tank Listing  
Financial Assurance = Financial Assurance Information Listing  
FINDS = Facility Index System/Facility Registry System  
FTTS-FIFRA/TSCA Tracking System = FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)  
FUDS = Formerly Used Defense Sites  
HIST FTTS = FIFRA/TSCA Tracking System Administrative Case Listing  
HMIRS = Hazardous Materials Information Reporting System  
ICIS = Integrated Compliance Information System  
INDIAN LUST = Leaking Underground Storage Tanks on Indian Land  
INDIAN ODI = Report on the Status of Open Dumps on Indian Lands  
INDIAN RESERV = Indian Reservations  
INDIAN UST = Underground Storage Tanks on Indian Land  
INDIAN VCP = Voluntary Cleanup Priority Listing  
INST CONTROL = Site Remediation Section Database  
LAST = Leaking Aboveground Storage Tanks  
LCP Closed = Landfills Priority List  
LIENS 2 = CERCLA Lien Information  
LIENS = Environmental Liens  
LUCIS = Land Use Control Information System  
LUST = Leak Sites  
MANIFEST = Hazardous Waste Manifest Data  
MDA LIS = Licensing Information System Database Listing  
MLTS = Material Licensing Tracking System  
MN DEL PLP= Delisted Permanent List of Priorities  
MN HWS Permit = Active TSD Facilities  
MN LS = List of Sites  
MN PLP = Permanent List of Priorities  
NPL LIENS = Federal Superfund Liens  
NPL = National Priority List  
ODI = Open Dump Inventory  
PADS = PCB Activity Database System  
PCB TRANSFORMER = PCB Transformer Registration Database  
Proposed NPL = Proposed National Priority List Sites  
PRP = Potentially Responsible Parties  
RAATS = RCRA Administrative Action Tracking System  
RADINFO = Radiation Information Database  
RCRA NonGen / NLR = RCRA - Non Generators

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RCRA-CESQG = RCRA-Conditionally Exempt Small Quantity Generator  
RCRA-LQG = RCRA-Large Quantity Generators  
RCRA-SQG = RCRA-Small Quantity Generators  
RCRA-TSDF = RCRA-Treatment, Storage and Disposal  
RMP = Risk Management Plans  
ROD = Records of Decision  
SCRD DRYCLEANERS = State Coalition for Remediation of Drycleaners Listing  
SHWF= State Hazardous Waste Facility  
SHWS = Superfund Site Information Listing  
SPILLS = Spills Database  
SRS = Site Remediation Section Database  
SSTS = Section 7 Tracking Systems  
SWF/LF = Permitted Solid Waste Disposal Facilities  
SWRCY = Recycling Facilities  
TIER 2 = Tier 2 Facility Listing  
TP = Target Property  
TRIS = Toxic Chemical Release Inventory System  
TSCA = Toxic Substances Control Act  
UMTRA = Uranium Mill Tailings Sites  
UNPERM LF = Unpermitted Facilities  
US AIRS = Aerometric Information Retrieval System Facility Subsystem  
US BROWNFIELDS = A Listing of Brownfields Sites  
US CDL = Clandestine Drug Labs  
US ENG CONTROLS = Engineering Controls Sites List  
US FIN ASSUR = Financial Assurance Information  
US HIST CDL = National Clandestine Laboratory Register  
US INST CONTROL = Sites with Institutional Controls  
US MINES = Mines Master Index File  
UST = Underground Storage Tank Database  
VIC = Voluntary Investigation and Cleanup Program

### 5.1.1 SITE

The Site was not identified on any of the databases searched by EDR®.

### 5.1.2 SURROUNDING AREAS

One (1) facility was identified on State or Federal database lists searched by EDR® within their respective search radii in addition to the Site. No vapor encroachment concerns were identified in association with the surrounding properties of the Site. The facility is discussed below:

- Jim Hogg County Law located at 802 N. Singrid Avenue; located approximately 575 feet south of the Site is included on the UST and Financial Assurance databases. This property is listed in EDR's report for a registered UST beginning in 1982. This property was not included on any databases related to releases. Based on the lack of regulatory enforcement and or evidence of release, the Jim Hogg County Law facility is not considered a REC.

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**5.2 LOCAL RECORDS**

Tetra Tech submitted an electronic Freedom of Information Act (FOIA) request to the Texas Commission on Environmental Quality and the Hebbronville Fire Department. A response was not received at the time of this report. Based on a copy of the deed for the Site obtained from the EDR Chain of Title report, the Site has been owned by Jim Hogg County, a Local Government Unit since June 2, 2005, and the previous owner of the Site was the United States of America. This was documented in Book 71452, page 373.

## 6.0 ADJACENT AND NEIGHBORING PROPERTIES

**Section 6.0** provides information on the history of neighboring properties to identify potential environmental impacts to the site.

### 6.1 NEIGHBORING PROPERTIES - CURRENT

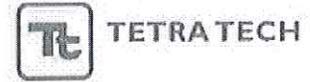
The Site's property is bound by an alleyway to the north and single-family residential properties beyond. The Site is bound to the east by single family residential properties. The Site is bound to the south by W. Harald Street and single-family residential properties beyond. The Site is bound to the west by N. Sigrid Avenue and multi-family residential apartments beyond. Beyond the residential apartments is desert/undeveloped land. No environmental concerns were observed in association with neighboring properties at the time of the site visit.

### 6.2 NEIGHBORING PROPERTIES - HISTORICAL

According to available historical documentation, the neighboring properties were generally agricultural or undeveloped land prior to the development of residential properties to the north, east and west of the Site and commercial properties to the south and southeast of the Site. Historical aerial photographs and topographic maps are included in **Appendices C and D**, respectively. No historical environmental concerns were observed for the neighboring properties.

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## **7.0 HAZARDOUS MATERIALS AND WASTE MANAGEMENT**

### **7.1 HAZARDOUS MATERIALS**

The Site consists of three buildings owned by Jim Hogg County. Compact Fluorescent Light (CFL) ballasts were observed in the drop ceilings of the three on-site buildings. The ballasts appeared to be in good condition at the time of Site reconnaissance. The CFLs at the Site are considered a BER.

With the exception of household cleaning products, Tetra Tech did not observe hazardous materials being utilized or storage at the Site during the Site reconnaissance. The household cleaning products were observed within the metal building located on the Site, and no evidence of staining or leaks were observed within the vicinity of the cleaning products.

### **7.2 HAZARDOUS AND NON-HAZARDOUS WASTE MANAGEMENT**

Hazardous waste is not currently generated or stored at the Site. In addition, evidence of former hazardous waste generation was not revealed during this assessment. Non-hazardous waste is generated on-site and placed into a rollaway container that is serviced by Jim Hogg County. Waste disposal at the Site is not considered a concern.

## **8.0 USER PROVIDED ENVIRONMENTAL INFORMATION AND INTERVIEWS**

The objective of the interviews is to obtain information concerning RECs in connection with the Property. This information was obtained verbally, as indicated below.

### **8.1 INTERVIEW WITH OWNER OR REPRESENTATIVE**

Tetra Tech interviewed Judge Humberto Gonzalez and Mr. Javier Zambrano representatives of the owner of the Site. Information obtained from Mr. Gonzalez and Mr. Zambrano is included in appropriate sections of this report.

### **8.2 INTERVIEW WITH PREVIOUS OWNER OR REPRESENTATIVE**

The Site was vacant at the time of site reconnaissance and past occupants were not readily available for interview. Based on site operations and review of regulatory data, Tetra Tech does not consider this data gap a REC for the Site.

### **8.3 INTERVIEW WITH ADJACENT PROPERTY OWNERS**

Tetra Tech attempted to speak with neighboring property owners and or operators during Site reconnaissance; however, the neighboring property owners were not readily available or were unwilling to participate in interviews during the time of the site reconnaissance. Based on site operations and review of regulatory data, Tetra Tech does not consider this data gap a REC for the Site.

### **8.4 USER PROVIDED INFORMATION**

The GSA did not provide historical reports for Tetra Tech to review.

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**9.0 DEVIATIONS**

There were no deletions or deviations from ASTM E 1527-13 with the exception of the following:

- Interviews with previous land owners were not conducted.
- Interviews with adjacent property owners were not conducted.
- Time gaps of more than 5 years were noted in available historical information and reasonably ascertainable historical information prior to 1940 was not obtained during this assessment.

Tetra Tech does not believe that the identified deviations impact our ability to render an opinion regarding potential RECs, CRECs, HRECs, or *de minimis* conditions for the Site.

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## 10.0 CONCLUSIONS AND RECOMMENDATIONS

Tetra Tech has performed this Phase I ESA in conformance with the scope and limitations of the ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E 1527-13) for the commercial structure, located at 1312 W. Harald Street, Hebbronville, Texas. This assessment has revealed the following findings that relate to potential for contamination or liability in connection to the Site.

### 10.1 CONCLUSIONS

The Phase I ESA identified the following findings at the Site:

- On the 1957 aerial photograph, the Site appears to be undeveloped or agricultural land. The Site may have previously been historically utilized as agricultural land and herbicides and pesticides may have been used during normal farming practices on site. The normal use and application of agricultural chemicals generally does not trigger enforcement actions, assessments by regulatory agencies, or the recommendation for further assessment of the Site unless there is evidence that indicates that misuse, dumping, or improper storage of chemicals is present or has occurred. There are no indications of the presence of on-site agricultural chemical mixing areas or that chemical dumping or improper storage has occurred. Tetra Tech does not consider the potential previous use of herbicides and pesticides at the Site to be a REC.
- One pole-mounted transformer was observed at the southwest corner of the Site. No labeling indicating polychlorinated biphenyl (PCB) content was observed on the transformer. No evidence of leaks or staining was observed on the transformer, and the transformer is not anticipated to represent an environmental concern at the Site.
- The U.S. Environmental Protection Agency (USEPA) has classified Jim Hogg County, Texas as being located within the USEPA Radon Zone 3, with indoor average radon levels less than 2 pCi/L. Based on information provided by the GSA, radon testing has not been conducted at the Site. The USEPA Radon residential threshold value for radon in indoor air is 4 pCi/L. According to the EDR report, one facility was tested in the 78361 zip code with radon observed under 2 pCi/L on the first floor living area. Site-specific radon testing has not been conducted at the Site according to historical information. Based on the results of this testing, the lack of a basement at the Site buildings, and the non-residential usage of the Site, radon is not considered a concern for the Site.
- A 500-gallon empty gasoline UST is located on the Site. The UST is considered to be an REC.

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- CFL ballasts were observed throughout the drop ceilings within the three on-site buildings. The bulbs appeared to be in good condition at the time of Site reconnaissance. The bulbs are considered a BER for the Site.
- Evidence of water damage was observed on the drop ceiling panels of the original Border Patrol building during the Site reconnaissance. The areas of water staining are considered to be a de minimis condition, and is therefore not considered a REC to the Site. Additional evidence of mold was not observed in any of the three buildings located at the Site. The water damage in the buildings is considered a BER.
- Based on the construction date of the original Border Patrol building (late 1950s), it is possible that ACM is located on the Site. ACM is considered a concern for the Site. If renovation or demolition occurs at the Site, an asbestos Operations & Maintenance Plan should be prepared and submitted for the Site and positive ACMs should be removed or managed in accordance with federal, state and local regulations.
- Based on the date of construction of the original Border Patrol building located onsite, it is possible the building may contain LBP. A LBP survey should be completed at the Site to determine LBP quantities at the Site. In addition, if renovation or demolition activities occur at the Site, LBP should be abated and disposed of in accordance to federal, state and local regulations.
- During the Site reconnaissance, Tetra Tech observed minimal hazardous materials within the metal building at the Site that consisted of general household cleaning supplies. No leaks or stains were observed and Tetra Tech does not consider the use or storage of these household cleaning supplied to be a REC.

### 10.2 RECOMMENDATIONS

Based on the conclusions outlined above, Tetra Tech makes the following recommendations to the GSA for consideration with respect to the Site:

- No further action is recommended in association with the potential former use of herbicides and pesticides in association with agricultural uses at the Site.
- No further action is recommended in association with the transformer located at the Site.
- No further action is recommended in association with potential radon issues located at the Site.
- No further action is recommended in associated with the CFL ballasts located within the on-site buildings.

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- A Phase II Environmental Site Assessment is recommended in association with the on-site 500-gallon gasoline UST. If future use of the on-site 500-gallon UST is unwarranted, it should be removed in accordance with applicable regulations and if any contamination (i.e. soil and/or groundwater) is encountered during the removal, it should be handled appropriately.
- Based on the construction date of the on-site buildings it is possible that the Site may contain Asbestos Containing Materials. If renovation or demolition occurs at the Site, an asbestos Operations & Maintenance Plan should be prepared and submitted for the Site and positive ACMs should be removed or managed in accordance with federal, state and local regulations.
- A LBP survey should be completed at the Site to determine LBP quantities at the Site. In addition, if renovation or demolition activities occur at the Site, LBP should be abated and disposed of in accordance to federal, state and local regulations.

**10.3 LIMITATIONS**

The conclusions of the report are professional opinions based solely upon visual site observations, and interpretations of analyses as described in this report. The opinions presented within this report apply to the site conditions existing at the time of the investigations, and interpretation of current regulations. Therefore, opinions and recommendations provided within this report might not apply to future conditions that may exist at the Site.

The resumes of the environmental assessor who conducted the site reconnaissance and prepared the report and the resume of the environmental professional who oversaw completion of this work are provided in **Appendix I**. We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 40 CFR 312.10 of this part. We have the specific qualifications based on education, training, and experience to assess a Site of the nature, history, and setting of the Site. We have developed and performed the all appropriate inquiries in general conformance with the standards and practices set forth in 40 CFR Part 312 and attest to the completeness and accuracy of the information contained in this report.

Site Assessor

Handwritten signature of Krista Jack in black ink.

Ms. Krista Jack

Report Author

Handwritten signature of Gabrielle M. Buda in black ink.

Ms. Gabrielle Buda

Technical Reviewer

Handwritten signature of Jimmy Kehs in black ink.

Mr. Jimmy Kehs

Quality Control Coordinator

Handwritten signature of Steve MacNeill in black ink.

Mr. Steve MacNeill

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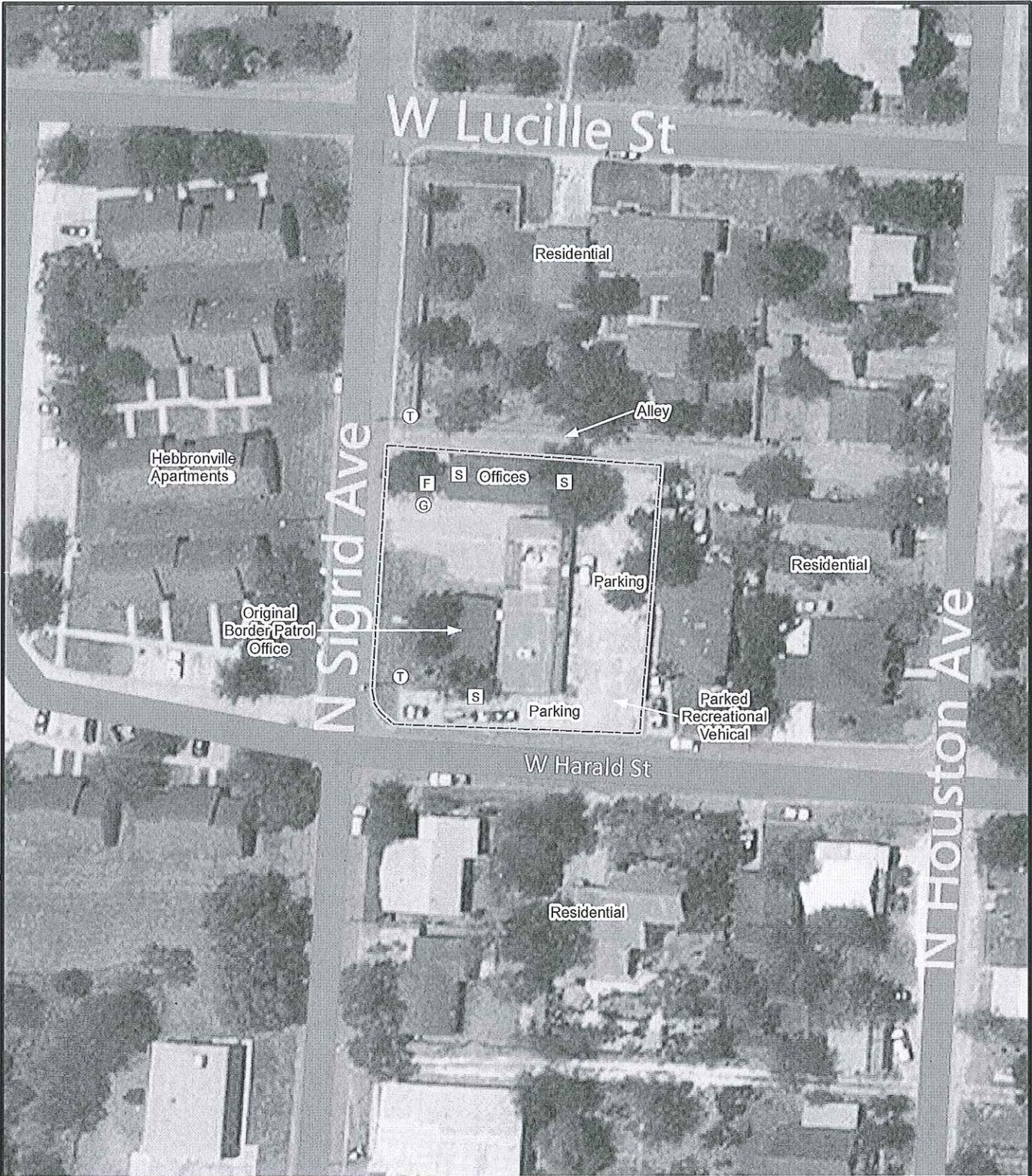


**11.0 REFERENCES**

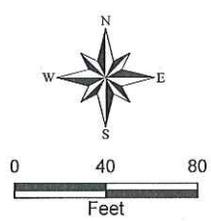
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- Approximate Site Boundary
- Pole-Mounted Transformer
- UST Fill Port
- Storage
- (1) Gas Dispenser on Concrete Island



HEBRONVILLE BORDER PATROL STATION  
 1312 WEST HARALD STREET  
 HEBRONVILLE, TEXAS

FIGURE 2  
 SITE LAYOUT MAP



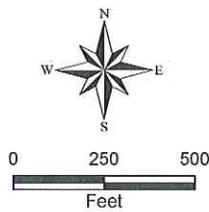
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**SITE  
LOCATION**

 Approximate Site Boundary



**HEBBRONVILLE BORDER PATROL STATION  
1312 WEST HARALD STREET  
HEBBRONVILLE, TEXAS**

**FIGURE 3  
AERIAL PHOTOGRAPH**



SOURCE: MODIFIED FROM BING MAPS AERIAL IMAGERY, 2012.