



Indiana Brownfields Program
an Indiana Finance Authority Environmental Program

100 North Senate Avenue, Room 1275
Indianapolis, Indiana 46204
www.brownfields.in.gov

Cindy Shively Klem
Brownfields Program Counsel
(317) 234-6018
cklem@ifa.in.gov

October 17, 2011

Section 106 Review Section
ATTN: Kim Padgett
Department of Natural Resources
Division of Historic Preservation and Archaeology
402 West Washington Street, Room W-274
Indianapolis, Indiana 46204-2739

Re: City of Columbus, Bartholomew County
Columbus Wood Treating Plant
Columbus, Indiana
Bartholomew County
Indiana Brownfields Program Project
**Request for Updated SHPO Concurrence previously
provided for HUD Grant # B-08-SP-IN-0518;
DHPA #9448**

Dear Ms. Padgett:

This letter is to serve as the Indiana Brownfields Program's ("Program") request for confirmation of the State Historic Preservation Officer's June 10, 2010 concurrence with the City of Columbus' finding that there are no historic buildings, structures, districts, objects or archaeological resources within the area of potential effects that will be affected by the above indicated project. (A copy of the SHPO's June 10, 2010 letter is attached as "**Exhibit A**"). The June 10, 2010 letter was issued as part of the Section 106 National Historic Preservation Act ("NHPA") review process that was initiated by the City of Columbus when obtaining HUD Economic Development Initiative funds for site remediation activities to occur at the Columbus Wood Treating Plant ("Site"). However, it has now been determined that the HUD funds are insufficient to cover the full cost of remediation needed at the Site. Therefore, the Columbus Redevelopment Commission ("Commission") has applied for additional federal funding from the Program in the form of a brownfield revolving loan fund ("RLF") loan.

As background, the Program is the recipient of a federal brownfield revolving loan fund grant for environmental remediation awarded by the U.S. Environmental Protection Agency which

the Program distributes as low-interest low funding. As a condition of use of the federal funds, the Program must ensure a review is conducted to determine the potential applicability of the National Historic Preservation Act to a site at which RLF funds will be spent. The Commission wishes to enter into a loan agreement with the Program to use RLF funds to remediate environmental conditions at the Site, which will now include treatment of impacted soil and groundwater by excavation and disposal of impacted soil, and in-situ soil solidification and stabilization. As discussed above, the SHPO previously reviewed information regarding this Site's historical background and planned remediation activities in conjunction with expenditure of HUD grant funds. The area of potential effects has not changed in location; only in depth and scope of the excavation areas. Consequently, the Program believes only confirmation of SHPO's earlier concurrence is needed to complete the NHPA review process for the RLF loan. Changes to the planned remedial activities are reflected in the Revised Remediation Work Plan dated September 20, 2011, and are discussed below. Further, the Revised Remediation Work Plan has been reviewed by the Program's technical staff and approved for implementation.

Information about the Program's and the Columbus Redevelopment Commission's Plans:

Federal Funding Source: The Commission wishes to enter into a low-interest loan agreement with the Program and will use federal RLF funds to remediate environmental contamination identified on the Site. Site maps and photographs were included in the original submittal to SHPO; however, an additional map is included with this letter as "**Exhibit B**" for your reference and review. *Exhibit B depicts the change in scope of the proposed areas of excavation of contaminated soil from the original Remediation Work Plan.*

Site Background:

The letters provided to SHPO in 2010 by the City of Columbus as part of obtaining its HUD grant provide a full description of the historical background of the Site. They are not included with this letter, but the DHPA # is identified at the beginning of this letter to cross-reference the document. Alternatively, if the SHPO prefers that the Program re-submit the City of Columbus' letters and documents, it will gladly do so upon request. The newly revised Remediation Work Plan is attached to this letter as "**Exhibit C**," which discusses the results of the environmental investigation work performed in August 2011 and the subsequent determination that the area and depth of identified contamination required a modification to the proposed remedial measures to fully address the contamination. Those modifications are as follows:

1. The area requiring remediation was revised based on the additional data, and is depicted on the map attached as Exhibit B.
2. The remedial method in the affected area of the Site was modified from excavation, removal, and disposal of contaminated soils to a maximum depth of approximately 18 feet deep across the entire affected area to removal and disposal of contaminated soils to varying depths in certain designated areas within the overall affected area combined

with in-situ soil stabilization of remaining soil contaminants to approximately 25 feet below ground surface.

Historical Status of Site:

The Former Columbus Wood Treating Plant Site is not listed on any State or National Registries, and it is not listed on the *Bartholomew County Interim Report, Indiana Historic Sites and Structure Inventory*. The full history of the Site was investigated and included as part of the original historical review documentation submitted by the City of Columbus for its HUD grant and was reviewed by SHPO at that time.

Thank you for your assistance with the Section 106 review process for the RLF loan. *The Program is happy to provide copies of previously submitted remediation work plans and letters if your file for this Site is incomplete.* In order to facilitate the appropriate review process by the U.S. Environmental Protection Agency, the Program requests that all correspondence from your office to the Program also be copied to Patricia Polston, Project Manager, U.S. Environmental Protection Agency, Region 5, 77 W. Jackson Blvd., SB-7J, Chicago, IL 60604. Please feel free to contact me at (317)234-0618 should you have any questions regarding this request.

Sincerely,



Cindy Shively Klem
Program Counsel

Enclosures

cc: *(via electronic transmission)*
Patricia Polston, U.S. EPA
Ed Curtin, Executive Director, Columbus Redevelopment Commission
Michele Oertel, Indiana Brownfields Program