



COMMUNITY INVOLVEMENT/RELATIONS PLAN

U.S. EPA Brownfield
American Recovery and Reinvestment Act of 2009 (ARRA) Revolving Loan Fund (RLF)
Assistance Amendment (AA) # 2B-00E96801-1 and RLF AA# #BL-00E48101-4

Former Columbus Wood Treating Plant Site
705 2nd Street (a.k.a. 53 Lafayette Avenue)
Columbus, Indiana
October 2011

OVERVIEW

The Indiana Finance Authority (IFA), through the Indiana Brownfields Program (Program), in cooperation with the City of Columbus (City) and in particular the Columbus Redevelopment Commission, has prepared this Community Involvement/Relations Plan (CRP) for the City's pending RLF Loan for the cleanup of the Former Columbus Wood Treating Plant Site located at 705 2nd Street (a.k.a. 53 Lafayette Avenue) in Columbus, Indiana (Site). The City has applied to the Program for a total of \$1.2 million for the Site which will be funded by a combination of the Program's ARRA RLF and Regular RLF funds and will facilitate Site reuse as a parking lot for a future recreational center. The CRP is in accordance with the Program's RLF Incentive Guidelines to help satisfy the public notice requirements of the IFA's cooperative agreement with the U.S. Environmental Protection Agency (U.S. EPA).

Borrowers funding cleanups with RLF Funds must provide the community with an opportunity to provide input on site cleanup and plans for redevelopment. The public must also have the opportunity to comment on the various required documents drafted in preparation for the environmental cleanup, and any comments must be considered as part of final cleanup decisions. A borrower of RLF Funds must adhere to the following public notice requirements:

- Establishment of a local Information Repository at or near the site(s) that includes public information supplied by both the IFA and the borrower related to the proposed response action;
- Administrative Record (collection of documents explaining the actions taking place at a site) that is available to the public;
- A remediation work plan (RWP) is part of the Administrative Record/Information Repository for public view;
- An Analysis of Brownfields Cleanup Alternatives (ABCA) document that identifies the remedial alternatives that were considered is part of the Administrative Record/Information Repository for public view;
- A response document from the State Historic Preservation Officer (SHPO) regarding results of a National Historic Preservation Act (NHPA) review for the subject site is part of the Administrative Record/Information Repository for public view;

- A site-specific CRP, including reasonable notice in a major local newspaper of general circulation, on the internet, or similar measure to target the general community and targeted area of the availability of documents for public view;
- Opportunity for involvement and allowance of adequate public comment periods, at least a 30-day notice;
- Response to public comments (summarized and documented in a decision memo or equivalent document) for the Program to decide on the proposed response action; and,
- Arrangement for information on the remediation findings and the proposed response action to be disseminated to the community in the surrounding affected area.

The purpose of this CRP is to explain strategies which will address communication of information to and involvement of the citizens of Columbus, Indiana, particularly the residents directly or potentially affected by proposed environmental response actions on the Site. The CRP outlines how Columbus has involved, should involve, and will continue to involve affected residents, City officials, and local organizations in the decision-making process regarding the environmental remediation efforts at the Site proposed for remediation and redevelopment.

The City is responsible for implementing the CRP with respect to Site environmental response activities. Active residents and institutions in the community are essential resources for the success of the CRP because they hold positions of responsibility within the community, and these citizens and organizations should be key points of contact and communication. The success of the environmental remediation and subsequent redevelopment of the Site hinges on informed citizen involvement in each step of the remediation and redevelopment process.

The City is primarily responsible for community notification and involvement during the redevelopment project regarding response actions and loan funding for Site activities. Columbus must notify residents or community groups in close proximity to the Site if impacts or activities at a Site are likely to affect them. Environmental response actions on-Site are anticipated to be funded, in part, by \$1.2 million in ARRA/RLF funding from the IFA. The City will repay loan funding with Tax Increment Financing (TIF).

Effective community involvement improves the chances for a long-term, sustainable brownfield project. Early community involvement is equal to cost-effective planning. Implementation of the CRP should be transparent and flexible.

SPOKESPERSON FOR INFORMATION REPOSITORY

The spokesperson for this federal loan funding is Mr. Ed Curtin, who may be contacted as noted below:

Ed Curtin
Executive Director, Redevelopment Commission
123 Washington Street
Columbus, Indiana 47201
Phone number: (812) 376-2547
Fax number: (812) 376-2579
Email address: ecurtin@columbus.in.gov

The main Information Repository, which contains the Administrative Record for site response actions, is located at the Columbus Clerk Treasurers Office (address indicated above) open Monday through Friday, between 8:00 am and 5:00 pm; to accommodate viewing after 5:00 pm, the Bartholomew County Library located at 536 5th Street, Columbus, IN 47201 will also serve as an Information Repository. The Administrative Record can be accessed by personal request at the public counter of the Columbus Redevelopment Commission and local library.

The Administrative Record for the Site is also available through the Indiana Department of Environmental Management's (IDEM's) Virtual File Cabinet (VFC) on the Internet at: <http://12.186.81.89/Pages/Member/EnhancedSearch.aspx>, searching by Brownfields Site # 4100901, IDEM State Cleanup Site # 000000310, IDEM VRP Site # 6060703, or the address of the Site.

SITE LOCATION

Former Columbus Wood Treating Plant Site

Indiana Brownfields Program Site #: **4100901**
IDEM State Cleanup Site #: **000000310**; IDEM VRP Site #: **6060703**
Street Address: **705 2nd Street** (a.k.a. 53 Lafayette Avenue)
City: **Columbus, Indiana** Zip: **47201** County: **Bartholomew**
Tax Parcel Identification #: **03-95-25-120-004.901-005**

SITE BACKGROUND

The Site consists of one parcel of land (Lot 3) with an area of approximately 1.24 acres located east of Lafayette Avenue and north of the railroad tracks. No existing buildings exist on the Site. The Site is currently vacant with trees and grass growing on-Site. See Attachment A.

Operations on the Site included the use of creosote for preservation of wood products. According to previous environmental reports, it appears that coal and coke processing took place at the Site from 1885 to 1903. The wood treating plant began operations at the Site in the 1920's, with the Hoosier Creosoting Co., Interstate Public Service Stock

Pens (livestock yard) listed as the first occupants of the Site in 1927 according to the Sanborn Map. The Site remained as a wood treating/creosote plant until it was completely destroyed in a fire in 1971. The Site was subsequently covered with fill material at an unknown later date. The Site is believed to have been undeveloped/vacant since 1971. The Site is currently owned by Columbus Downtown Inc.

Summary of Contamination Issues per three Phase I (1999 & 2008 & 2009) and four Phase II (1999, 2002, 2008, & 2010) Environmental Site Assessments:

- Contaminated soil throughout the southwest portion of the Site. Detected Hazardous Constituents: volatile organic compounds (VOCs) (primarily naphthalene), semi-volatile organic compounds (SVOCs), some polynuclear aromatic hydrocarbons (PAHs), total petroleum hydrocarbons-extended range organics (TPH-ERO), and arsenic.
- Contaminated groundwater on-and off-Site to the south and west. Detected Petroleum Constituents: PAHs, TPH-ERO, VOCs, and arsenic.
- Specifically, relatively high levels of pentachlorophenol (PCP), naphthalene, benzo(a)pyrene and other SVOCs are present in the soil and groundwater. There is no documentation regarding history of spills or hazardous materials incidents at the Site.
- Remedial Approach: Soil treatment/excavation/capping and groundwater remediation/monitoring. Enhanced in-situ soil solidification/stabilization will be used to treat metals, VOCs, and SVOCs in soils; its function is to physically bind and chemically treat the contaminants resulting in a homogeneous, cement-like structure in the subsurface to immobilize and degrade contaminants and thereby reduce associated groundwater contamination.

Generally, the technical approach to remediating the soil and redevelopment of the Site includes the excavation and stockpiling of clean soil overburden to an average depth of 8 feet, the excavation and disposal of contaminated soil, and enhanced in-situ soil stabilization / solidification of some of the contaminated soils. The clean overburden soil will be replaced in the excavation, re-graded, and compacted. Finally, an asphalt parking lot will be constructed over the excavated/treated soil, reducing infiltration and leaching of contaminants to the groundwater. The parking lot will also prevent direct exposure of residual soil impacts. Destroyed monitoring wells will be replaced with new monitoring wells after the remediation construction, and all the monitoring wells will be sampled for 4 quarters. A remediation report will be submitted to the Program upon completion of the remedial activities.

REDEVELOPMENT PLANS

The City Redevelopment Commission intends to acquire the Site and redevelop it for use as a parking lot to service a new indoor sports complex. Maintenance and management of the redeveloped Site will be provided by the City of Columbus Parks

Department. A sustainable landscape will be considered in applicable areas for the Site, with a focus on the use of native plants in a low-maintenance design. This project is a part of the overall plan by the City to become a leader and host in amateur sports competitions.

NATURE OF THREAT TO PUBLIC HEALTH AND ENVIRONMENT

Based on the findings of the Phase II ESAs, the former industrial Site has detected hazardous substances and/or petroleum contamination in soil and/or groundwater from the Site's previous wood treating operations. Human health impacts to site occupants, construction workers and potential groundwater users are possible from current Site conditions. Impact to wildlife and ecology, though remote, are also possible from current Site conditions. However, the Site does not pose an imminent threat to human health or the environment.

There is little risk of direct contact exposure to contaminated surface soil since the contaminant levels detected in the surface soil (surface to 6 inches below surface) are nearly all below the IDEM Risk Integrated System of Closure (RISC) closure levels. Regardless, the direct contact exposure pathway will be eliminated by covering all soil on the Site with at least 1 foot of clean soil plus a paved parking lot. The direct exposure pathway will be further reduced or eliminated by the removal or treatment of all soil exceeding the IDEM RISC industrial/commercial/direct contact closure levels.

There is a potential for dermal exposure for construction workers at the Site from subsurface soils. Migration to groundwater exposure will be reduced by removal and/or treatment/solidification of contaminated soil designed to greatly reduce potential for leaching to groundwater by reducing the permeability of the contaminated soil.

Groundwater beneath the Site is a drinking water source aquifer; however, the active drinking water source wells are located in Lincoln Park approximately 1.75 miles northeast of the Site and in Bartholomew County 4-H Fairgrounds located approximately 2 miles southwest of the Site. It is unlikely that ingestion is a risk to humans at the Site because of the locations of the drinking water supply well fields. All adjoining and down-gradient properties are non-residential and have access to City water. An environmental restrictive covenant (ERC) will be attached to the property deeds for the Site and nearby sites prohibiting groundwater usage as drinking water.

There is a potential for inhalation exposure to migrating VOC vapor (i.e., naphthalene) for building occupants over the impacted soil and groundwater plume. However, there are no occupied buildings within the area of the known contaminant plume.

The future use of the Site is a parking lot. The parking lot surface will act as a cap to greatly reduce water infiltration and thus potential further leaching of residual

constituents to groundwater. The upper layer of backfill and parking lot will also prevent direct exposure to contaminated soils.

The Site is enrolled in the Program and has a history in the IDEM State Cleanup program and Voluntary Remediation Program (VRP). The Program will provide oversight of remediation activities. Remedial actions will be focused primarily on soil removal/disposal at an approved landfill, remaining soil treatment/solidification, capping, and associated groundwater treatment to IDEM RISC non-default industrial/commercial closure levels and direct contact construction worker levels. Additional activities include removal of bulk containers of hazardous substances, pollutants and contaminants; disposal of hazardous materials and petroleum contamination; Site monitoring activities necessary during the cleanup process; and cleanup verification and confirmation sampling.

COMMUNITY BACKGROUND

The Site is located within a commercial district. The City is poised for redevelopment opportunities, including this industrial/commercial-to-recreational redevelopment project, to help stimulate its local economy.

The City has an IFA State Revolving Fund (SRF) funding award and U.S. Housing and Urban Development (HUD) funding award to supplement Site remediation costs, and TIF is available to assist in the implementation of cleanup and redevelopment project for this area. The City also needs the RLF funding from the IFA to facilitate the remediation and reuse of this former industrial Site. With this loan funding, the Site will be usable for its intended redevelopment as a recreational facility parking lot.

Local leaders involved with these redevelopment efforts include the City Redevelopment Commission, the City Council members, and the City Parks Department, among others.

CHRONOLOGY OF COMMUNITY INVOLVEMENT

Several Redevelopment Commission meetings have discussed and received comments on the funding. Both the Redevelopment Commission and the City Council have discussed the reuse plan for the Site in public council meetings. The overall response has been positive because the area of the anticipated economic impact and community benefit of the new indoor sports complex.

The main components of community involvement include the release of the Revised RWP and public meetings associated with the release and approval of bids for the remediation of the Site. The meetings will be held prior to approval of the contract for

the soil remediation by the Columbus Redevelopment Commission. All Columbus Redevelopment Commission board meetings are open to the public. City officials and public bodies (Mayor and City Council) will be kept apprised of the status of the project by means of internal progress reports. All reports are public documents and will be provided as requested.

Community involvement has been an ongoing element of the City's redevelopment efforts and will continue to be a priority. Prior to applying to the IFA for loan funding for Site remediation, the City has involved its community members in part because of other state and federal funding it has sought/received. The City has/will inform the public through flyers, news articles, meetings and published meeting notes. The City has/will solicit input through advisory committees/groups, Site visits, and meetings with key community representatives.

To comply with U.S. EPA's 30-day public notice/comment period prior to the anticipated loan closing in December 2011, the City prepared a legal ad for the RWP to run from October 18, 2011 to November 18, 2011. Subsequent City legal ads will reference the ABCA and the SHPO response, as well as this CRP, in the designated local public repositories for review. The City plans to compile/address any comments prior to the loan closing.

CONTINUED COMMUNITY INVOLVEMENT

The City is committed to maintaining community involvement for the Site cleanup and redevelopment process. The City has and will dedicate necessary staff time to complete such administrative requirements. The City may also dedicate in-kind services as dictated by the ultimate redevelopment plans for the Site. Community involvement activities will continue to include: public meetings/hearings on cleanup financing initiatives, local approvals of key brownfield financing and cleanup milestones in public meetings, public input throughout the Site plan review and approval process, and maintenance of the public repository of key documents.

Key local officials and community members will be updated on a regular basis at the public meetings. Opportunities for continued public participation in decisions concerning environmental response actions at the Site and the City's intentions for loan funding will be provided primarily through public notices and meetings. The City will engage all informational activities in the community.

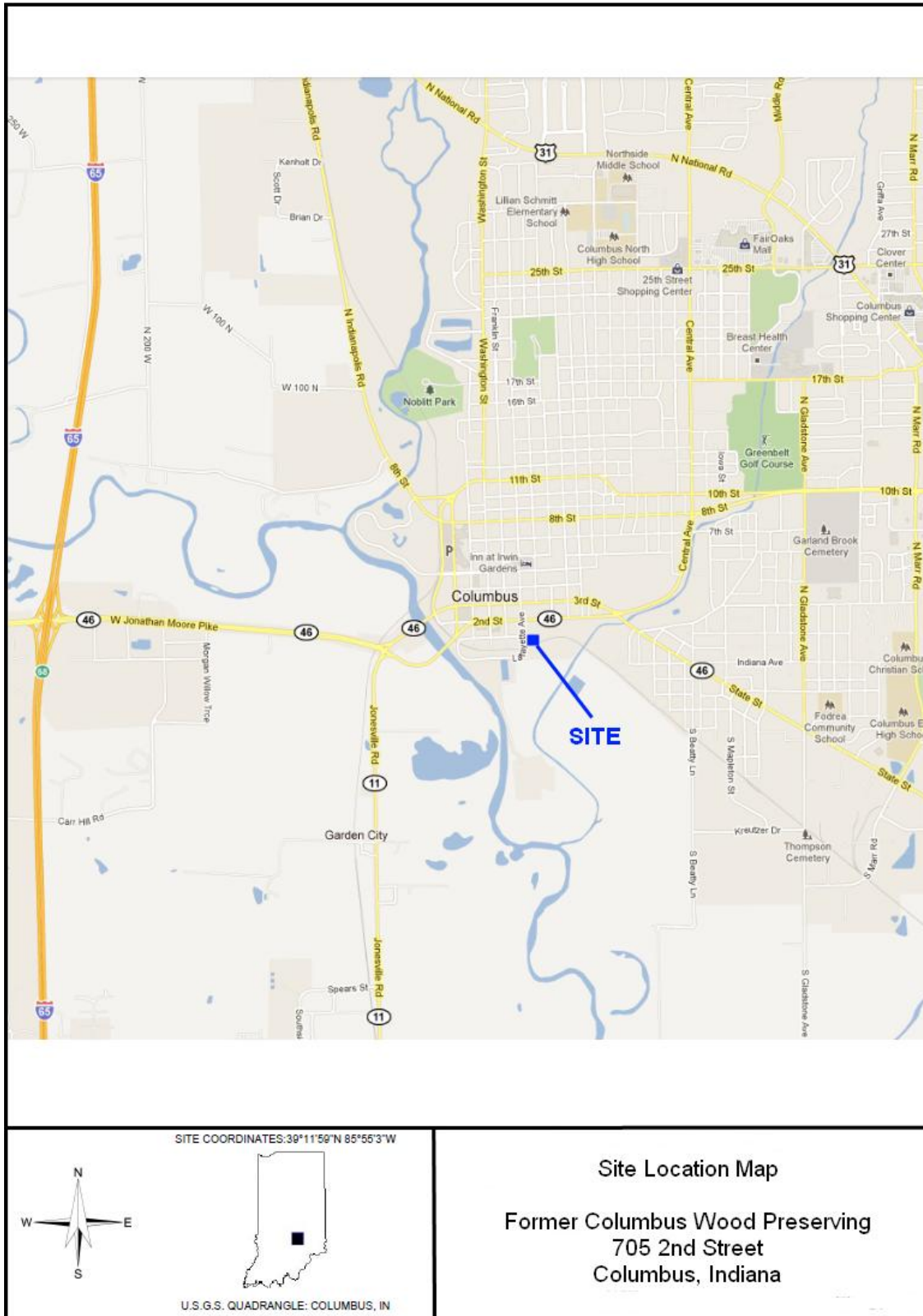
In conformance with U.S. EPA guidelines and Act 381 requirements, public notices will be published and disseminated, public comments will be received and evaluated, public hearings may be conducted, and documents and plans will be approved by public bodies in public session prior to initiation of response actions at the Site. The City will utilize its web site <http://www.columbus.in.gov/> and published notices in the local newspaper to inform the community about agendas, meeting minutes, requests for

proposals, etc., but cannot accommodate large documents. While the City does not anticipate issuing any newsletters, following is a list of the types of public notices, hearings, and sessions to be published:

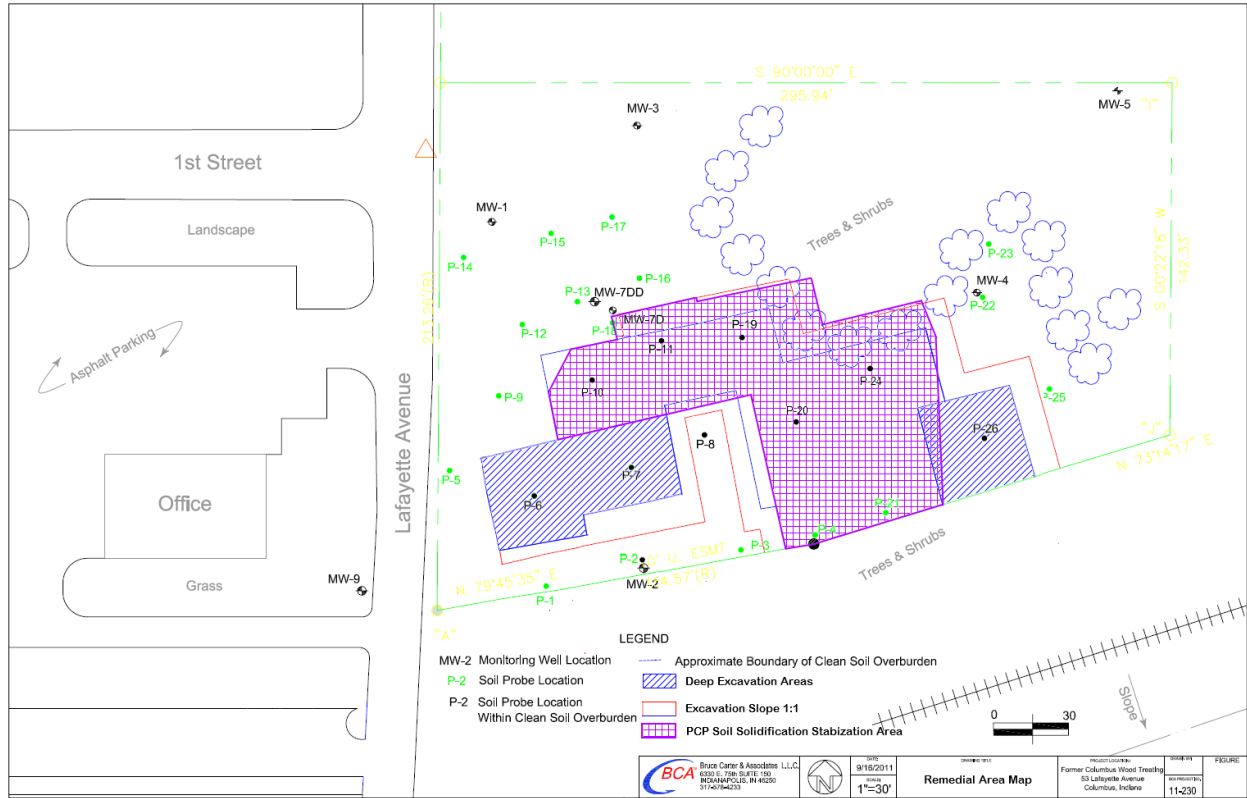
- notice announcing document information repository and response actions;
- notice announcing the availability of the Administrative Record including the CRP, the RWP, the ABCA, and other relevant Site documents for a 30-day comment period;
- notice announcing public hearing(s) and/or meeting(s);
- public meeting(s) and/or public hearings (s) for comments/approval on Site plans.

The document information repository will be maintained and updated throughout the environmental response action phase of Site redevelopment.

ATTACHMENT A MAPS/DIAGRAMS/PHOTOS



ATTACHMENT A (cont.) MAPS/DIAGRAMS/PHOTOS



**ATTACHMENT A (cont.)
MAPS/DIAGRAMS/PHOTOS**

