

Community Relations Plan Brownfields Cleanup and Redevelopment of the Central Montana Medical Center - Cancer Center Renovation

408 Wendell Avenue,
Lewistown, Montana

April 14, 2023



Prepared by:



**Snowy Mountain
Development
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Main Street, Lewistown,
MT 59457**

**Central Montana Medical Center –
Cancer Center Renovation
Community Relations Plan**

408 Wendell Avenue, Lewistown, Montana

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4/15/2023
Date

Approved by: 
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U.S. Environmental Protection Agency, Region VIII

4/25/2023
Date

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MAPS

MAP 1 Site Location Map

LIST OF ABBREVIATIONS AND ACRONYMS

ABCA	Analysis of Brownfields Cleanup Alternatives
ACM	Asbestos Containing Materials
COC	Contaminants of Concern
BGS	Below Ground Surface
CRP	Community Relations Plan
MT-DEQ	Montana Department of Environmental Quality
QEP	Qualified Environmental Professional
Site	Cancer Center 408 Wendell Avenue, Lewistown, Montana
SMDC	Snowy Mountain Development Corporation
U.S.	United States

OVERVIEW

The purpose of this Community Relations Plan (CRP) is to describe Snowy Mountain Development Corporation's (SMDC) strategy to address the needs and concerns of its residents and visitors who may potentially be affected by the proposed environmental remediation and redevelopment activities conducted at the Central Montana Medical Center property located at 408 Wendell Avenue in Lewistown, Montana (hereafter referred to as the Site). This CRP outlines how SMDC has involved, and will continue to involve its residents and visitors, the Montana Department of Environmental Quality (MT-DEQ), the United States Department of Environmental Protection Agency (US EPA), and local organizations in the process of remediation for activities at the Site.

SPOKESPERSON AND ADMINISTRATIVE RECORD

The spokespersons for the project are Sara Hudson, SMDC Executive Director, Cathy Barta, SMDC Redevelopment Director, Tonya Garber, SMDC Redevelopment Manager, and WWC Engineering Project Manager Kevin Grabinski who is the acting Qualified Environmental Professional (QEP) for SMDC under contract.

Ms. Hudson may be contacted at: HUDSON@SNOWYMOUNTAINDEVELOPMENT.COM or (406) 535-2591.

Ms. Barta may be contacted at: BARTA@SNOWYMOUNTAINDEVELOPMENT.COM or (406) 535-2591.

Ms. Garber may be contacted at: GARBER@SNOWYMOUNTAINDEVELOPMENT.COM or (406) 535-2591.

Mr. Grabinski may be contacted at: KGRABINSKI@WWCENGINEERING.COM or (406) 443-3962 x109.

The administrative record files are located at SMDC at 507 West Main Street, Lewistown, Montana and includes the following documents related to environmental assessment and remediation of the project site:

- Community Relations Plan (CRP);
- CMMC-Cancer Center Project Pre-Renovation Asbestos Inspection Report;
- Analysis of Brownfield Cleanup Alternatives (ABCA);
- Any public comments received along with SMDC's response to those comments; and
- Any assessment documents, MT-DEQ work plans and cleanup completion documentation outlining the cleanup standards post-cleanup.

SITE DESCRIPTION AND HISTORY

SITE LOCATION

The Site consists of one property locally known as the Central Montana Medical Center located at 408 Wendell Avenue, in Lewistown, Montana. The legal description for 311 W. Main St. is: Central Montana Hospital, S16, T15 N, R18 E, Tracts 1, 2, 3, 4 Less Relocated lot 1 Of Amended PLT West Lewistown & CMMC Add.

SITE HISTORY

In early 2021, CMMC was approached by the Helmsley Charitable Trust for

consideration of adding a cancer center to their campus to ensure residents would not have to travel greater than 100 miles to seek cancer treatment and care. The Trust offered 6M\$ to assist with construction of the new center.

The Helmsley Cancer Center at CMMC will provide comprehensive, high-quality cancer care closer to home for residents of nine-counties in central Montana with a population of over 33,000. This “care at home” will reduce or eliminate the estimated 164,000 highway miles and over 6,000 hours travel time to urban centers for cancer patients living in the region. Plans for the new Helmsley Cancer Center include expanded areas for Medical Oncology and support services in addition to new Radiation Oncology capability. Construction of the Cancer Center is expected to begin in Spring of 2023, with a completion date in early 2024. This sustainable program is anticipated to alleviate the significant current travel burden experienced by over 250 patients each year as they seek life-sustaining care in distant urban centers.

As part of the renovation process, the Chief Executive Officer (CEO) of CMMC ordered a Pre-Renovation Asbestos Inspection from Tetra Tech. On November 30 and December 1, 2021, Tetra Tech, Inc. (Tetra Tech) conducted a pre-renovation asbestos inspection at the above referenced site. Based on correspondence prior to commencement of the project, Tetra Tech was instructed to conduct an inspection for suspect asbestos-containing materials (ACM) in select portions of the building for future renovation purposes. The results of the sampling confirmed the presence of asbestos containing materials at the Site.

The purpose of this project is to eliminate the potential exposure of the public, clinic personnel, and contractors to these materials, and to facilitate the renovation of the building by lowering the cost of remediation for the Cancer Center. This Brownfields grant will be used to provide project coordination; provide community outreach services; secure an environmental engineering consultant to oversee and monitor the removals; and to pay for the removal and disposal of the materials.

COMMUNITY PROFILE

The CMMC property is located in Lewistown, Montana, the Fergus County Seat. Lewistown’s population is 5,952¹ with a median age of 46.5² years and an estimated median household income of \$49,425³. The Site is located west of the downtown commercial area of Lewistown.

NATURE AND THREAT TO PUBLIC HEALTH AND ENVIRONMENT

The current threat to public health is the exposure to hazardous substances and asbestos by individuals entering the building during construction. Certain asbestos-containing materials in the building are in poor condition that could cause the release of asbestos

¹ <https://data.census.gov/table?q=Lewistown+city,+Montana&tid=DECENNIALPL2020.P1> (accessed 2/27/2023)

² <https://data.census.gov/table?q=Lewistown+city,+Montana&tid=ACSST5Y2021.S0101> (accessed 2/27/2023)

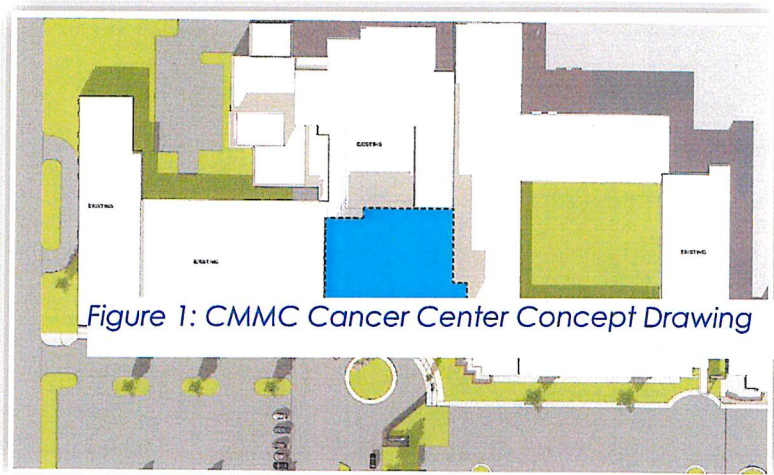
³ <https://data.census.gov/table?q=Lewistown+city,+Montana&t=Income+and+Poverty&tid=ACSST5Y2021.S1902> (accessed 2/27/2023)

fibers to the air, and to building floors and surfaces.

PROPERTY REDEVELOPMENT PLANS

The Central Montana Medical Center is located on the west side of town as you enter the city limits and sits at the top of the hill overlooking five island mountain ranges.

The hospital is working with Cushing Terrell Architects to renovate the building and build the cancer center. This expansion will allow them to provide comprehensive, high-quality cancer care closer to home for residents of a nine-county area in central Montana with a population of over 33,000. This “care at home” will reduce or eliminate the estimated 164,000 highway



miles and over 6,000 hours travel time to urban centers for cancer care that patients living in this region currently endure. On-site Medical Oncology will begin immediately through outreach services in partnership with Billings Clinic Cancer Center. The timeframe for construction on the Helmsley Cancer Center, including expanded areas for Medical Oncology and support services in addition to new Radiation Oncology capability, is expected to begin in Spring of 2023, with a completion date in late spring to early summer 2024. This sustainable program is anticipated to alleviate the significant current travel burden experienced by over 250 patients each year as they seek life-sustaining care in distant urban centers.

BENEFITS TO THE COMMUNITY

A Comprehensive Cancer Center, located at CMMC, will provide residents of this region high-quality cancer treatment closer to home, reducing the tremendous burden of travel for care. It will also bring the opportunity to participate in clinical trials and other treatment innovations, helping to address the medical disparity that currently exists in this rural region.

Not only will the addition of the Cancer Center provide a higher level of medical care, patients and their families have the additional benefits that include:

- **Reduced cost:** there are both financial and emotional costs inherent in cancer care patient transport either within the state or to other states for care. Cancer patients need family support, and in addition to the basic cost of patient transport, families must absorb travel, lodging, and per diem costs to accompany their family member to a distant healthcare facility. Added to those costs are lost time and wages if a caretaker or family member must leave his/her job, and the stress placed on the

cancer patient who is taken away from home to unfamiliar surroundings while receiving life sustaining care.

- **Increased access:** all communities served by this project are classified as “frontier,” which means they are at least an hour away from the nearest 75-bed hospital. Local access to cancer care and appointments will represent a significant increase the quality and quantity of healthcare available to patients who reside in the communities served by the Cancer Center.
- **Increased patient/family access to information:** providing access to information and education for patient families who are far removed from a Cancer Center will enable families to take greater control of their own health care and increase their confidence levels in managing their health and the health of their family members.

Additionally, this project will bolster economic development in the community by providing an opportunity for healthcare workforce development, which is a much-needed resource, as indicated by the fact that the whole region is medically underserved.

The Lewistown community will additionally benefit from this project in four primary ways. First, the removal of the hazardous substances and asbestos-containing materials from the buildings will halt the release and spreading of these substances within the buildings; second, the removal of the hazardous substances and asbestos-containing materials from the buildings will reduce threats to human health in that the threat of exposure to individuals entering the building by authorized or illegal means will be eliminated; third, the cleanup will facilitate the redevelopment as it will lower the cost threshold for the renovation planned for the clinic; fourth, the cleanup of the building will advance the conversion of the site from a community asset into a regional asset.

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA) PROPOSED REMEDIATION PLAN

As part of the Snowy Mountain Development Corporation’s Brownfields Program, WWC Engineering completed an Analysis of Brownfields Alternatives (ABCA) dated April 11, 2023 to evaluate potential cleanup alternatives for the Site. To satisfy USEPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative. To address contamination at the Site there are three different alternatives considered:

Alternative #1: No Action - In this alternative, no cleanup, abatement, or renovation would occur, and the existing structure would remain as-is. While the No Action alternative would have minimal direct costs, it would also leave the hazards in place and renovation could not occur.

Feasibility: This alternative is deemed infeasible due to the CMMCs intention to renovate the structure and construct the CMMC Cancer Center. ACM will have to be disturbed to facilitate the construction of the Cancer Center.

Effectiveness: This alternative effectively controls potential exposure of commercial workers to the ACM in the short term but does not address long term exposure or provide

a desirable renovation to the CMMC facility.

Cost: Direct costs are minimal. Additional costs may be incurred to perform periodic monitoring of the building conditions and to maintain management plans.

Alternative #2: Abatement and Disposal of Selected ACM - In this alternative, a selected portion of the ACM identified in the building would be abated and disposed, based upon the areas anticipated to be disturbed during the renovation.

Assumptions made when creating the cost estimate for this alternative includes:

1. Selected ACM located in the basement and associated black mastic that is located within the main hallway will be removed from the building and disposed off-site (approximately 2,577 sq. ft). The remaining ACM located in basement rooms will not be disturbed by the renovation and will remain in place;
2. The transite panels (approximately 348 sq. ft.) will be removed and disposed of off-site. The ACM flooring identified on the main level will not be disturbed by the planned construction and will remain in place.
3. A selected portion of the buildup roof system and sealant on the roof (approximately 20 sq. ft.) will be removed from the building and disposed off-site to facilitate the construction of a new overflow roof drain and new air exhaust. The rest of the ACM roofing will not be disturbed and will remain in place.

Feasibility: This alternative is technologically feasible and meets the state and federal requirements.

Effectiveness: This alternative is effective in removing the selected portion of the ACM identified at the Site in order to facilitate renovation efforts; however, ACM will remain in place that will have to be mitigated and maintained with a management plan by the hospital. Any future renovations that would disturb remaining ACM will require additional abatement at that point in time.

Cost: The abatement capital cost for this alternative is estimated to be approximately \$22,876. This estimate includes a 20% contingency for costs associated with additional ACM that may not have previously been identified. The contingency may not cover all potential costs of unforeseen conditions, including the management of additional unidentified hazardous building materials (i.e. PCB ballast, mercury switches, etc.).

Alternative #3: Abatement and Disposal of All ACM - In this alternative, all the ACM identified in the building would be abated and disposed of off-site.

Feasibility: This alternative is technologically feasible and meets the state and federal requirements. However, this alternative would require the hospital staff to remove furnishings from all of the rooms with ACM and cause logistical challenges for the hospital operations by displacing staff from their normal offices and workspaces.

Effectiveness: This alternative is effective in mitigating all the identified ACM.

Cost: The abatement capital cost for this alternative is estimated to be approximately \$243,148. This estimate includes a 20% contingency for costs associated with additional

ACM that may not have previously been identified. The contingency may not cover all potential costs of unforeseen conditions, including the management of additional unidentified hazardous building materials (i.e. PCB ballast, mercury switches, etc.). This cost estimate does not include costs incurred by the hospital to remove furnishings from all the rooms that would have abatement activities going on.

Consideration of Climate Change Impacts

Regional trends show increased extreme weather such as increased frequency of heavy precipitation events and increased frequency of flooding affect the site. The site will maintain similar amounts of impervious surfacing with all three alternatives and will not increase the volume or peak flowrate of runoff from the site during a precipitation event. The site is also located outside of a mapped floodway, greatly reducing the chances of flooding affecting the hospital.

Exposure Pathways

The Contaminants of Concern (COC's) identified at the Site include Category I and Category II, Non-Friable Asbestos Containing Materials (ACM). These materials do not have an exposure pathway, unless they are made friable by sanding, grinding, cutting, or abrading.

Alternative #1 would not have an exposure pathway.

Alternatives #2 and #3 will have an exposure pathway for materials that are made friable during the abatement process. Appropriate containment areas will be required for the abatement to ensure that asbestos made friable during the abatement is removed from the hospital. The ACM will be kept sufficiently wetted during abatement. Additionally, the abatement contractor will coordinate with the hospital facilities manager to close air vents and returns for the HVAC system within the areas where abatement work is occurring.

Recommended Cleanup Alternative

The recommended cleanup alternative is **Alternative #2: Abatement and Disposal of Selected ACM**.

Alternative #1, No Action does not remove the ACM from the Site to facilitate renovations. **Alternative #2** removes a selected portion of the ACM from the Site and will facilitate planned renovations; however remaining ACM will need to be documented and maintained utilizing a management plan by the hospital.

Alternative #3 effectively mitigates all the identified ACM and facilitates more than the planned renovation; however, the costs for this alternative are significantly higher and would require displacing staff from their offices and workspaces.

For these reasons, **Alternative #2 is the recommended alternative.**

Green and Sustainable Remediation Measures for Selected Alternative

To make the selected alternative more sustainable, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort. SMDC will require the abatement contractor to follow an idle-reduction policy and use heavy equipment with advanced emissions controls operating on ultra-low sulfur diesel. The number of mobilizations to the Site will also be minimized.

PUBLIC COMMUNICATION

Overall, the current landowner and public, through various landowner correspondence and meetings, have stated that they would like to see the Site remediated to permit redevelopment to safeguard human health.

COMMUNICATION OUTREACH

SMDC updates Site and project status information on its organizational website: www.snowymountaindevelopment.com. In addition, Brownfields projects are summarized in SMDC's Executive Director's Reports, which are discussed at SMDC's Board Meetings, and uploaded to its electronic publishing platform on ISSUU: <https://issuu.com/snowymountaindevelopment>.

SMDC staff also upload photos and project information on its Facebook page: www.facebook.com/snowymountaindevelopment and LinkedIn page: <https://www.linkedin.com/company/snowy-mountain-development-corporation>.

SMDC staff provide Media Releases to local newspapers and radio stations informing them of newsworthy project updates.

CONTACTS

Entity	Name	Title	Address	Phone Number	Email Address
Media Contact	Lewistown News-Argus	Advertising Department	521 W. Main P.O. Box 900 Lewistown, MT 59457	(406) 535-3401 1-800-879-5627	editor@lewistownnews.com
Central Montana Medical Center	Cody Langbehn	Chief Executive Officer	408 Wendell Ave Lewistown, MT 59457	(406) 535-6200	clangbehn@cmmccares.com
State of Montana Fire Marshal	Sally McKenna	Deputy State Fire Marshal, Area 4	P.O. Box 31094 Billings, MT 59107	(406) 896-1094	smkenna@mt.gov
MDEQ	Jason Seyler	MT DEQ Brownfields Lead	P.O. Box 200901 Helena, MT 59620-0901	(406) 444-6447	jseyler@mt.gov
U.S. EPA	Greg Davis	Brownfields Project Manager	US EPA, Region 8 1595 Wynkoop Street Denver, CO 80202	(303) 312-6184	gregory.davis@epa.gov

REFERENCES

Pre-Renovation Asbestos Inspection Report for the Cancer Center Project for Central Montana Medical Center, 408 Wendell Avenue, Lewistown; prepared by Tetra Tech, Inc. Roger W. Herman, Dec. 15, 2021 (83 pgs.)

MAP 1: Overview of location

