

Community Relations Plan

Brownfields Cleanup and Redevelopment of the Former Farmer's Union

101 2nd Street East, Roundup, Montana

July 31, 2020



Prepared by:



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507 West Main Street, Lewistown, MT
59457

**Former Farmer's Union
Community Relations Plan
101 2nd Street East, Roundup, Montana**

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7.31.2020
Date

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U.S. Environmental Protection Agency, Region VIII

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	Former Farmer's Union, Roundup, MT
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 the residents and visitors who may potentially be affected by the proposed environmental remediation and redevelopment activities conducted at the Former Farmer's Union property also known as the Golden Thimble and Musselshell County Food Bank located at 101 2nd Street East, Roundup, Montana (hereafter referred to as the Site). This CRP outlines how SMDC has involved, and will continue to involve the community, 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.

The cleanup project is being funded by an U.S. EPA Brownfields Revolving Loan Fund (BF 96809001) cleanup grant awarded in March of 2012 to Snowy Mountain Development Corporation of Lewistown. This grant specifically provides funds for the cleanup and redevelopment of Brownfields properties. This CRP is designed to meet the overall community involvement requirements for the cleanup of subject properties under the grant award.

Active residents, local organizations and civic leaders involved in neighborhood issues are important resources for the success of this Plan as they have an understanding of the subject property, existing challenges and opportunities. Additionally, these individuals hold key positions of responsibility within the community. SMDC recognizes these citizens as points of contact and communication. The long-term success of the proposed cleanup project and redevelopment will be enhanced by on-going citizen involvement. This on-going conversation with vested stakeholders will ensure the proposed cleanup projects are successfully executed and move the subject property closer to the community-derived redevelopment goal.

SPOKESPERSON AND ADMINISTRATIVE RECORD

The spokespersons for the project are Kathie Bailey, SMDC Executive Director, Cathy Barta, SMDC Redevelopment Director and WWC Engineering Project Manager Greg Reid, who is the acting Qualified Environmental Professional (QEP) for SMDC under contract.

Ms. Bailey may be contacted at: bailey@snowymountaindevelopment.com or (406) 535-2591.
Ms. Barta may be contacted at: barta@snowymountaindevelopment.com or (406) 535-2591.
Mr. Reid may be contacted at: greid@wwcengineering.com or (406) 894-2210.

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);
- Hazardous Materials Survey 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.

This information is available for viewing at SMDC during normal business hours and is also available on their website which is listed below:

<http://www.snowymountaindevelopment.com/>

Public Meetings will be primarily held within the local area of the City of Roundup. These meetings will be coordinated with Musselshell County to determine actual dates, times and location address. Additional public meetings may be held periodically at the Site or at another public venue. These meeting times and places will be advertised in the local newspaper as applicable.

SITE DESCRIPTION AND HISTORY

SITE LOCATION

The Site consists of one property owned by Musselshell County which is locally known as the Former Farmer's Union located at 101 2nd Street East, Roundup, Montana. The legal description: Roundup Original Townsite, Section 13, Township 08 North, Range 25 East, Block 022, Lot 005, E 84 FT of lots 5 & 6. Total acres of the property: 0.193 acres.

SITE HISTORY

The 20th century saw the heyday of settlement in the Musselshell valley, with expansion of agriculture, the homesteading boom, opening of the Republic Coal Company mines at Roundup in 1907, and construction of the new Chicago, Milwaukee & St. Paul Railroad through the valley in 1908. In 1911, Roundup became the county seat of newly-formed Musselshell County, and prospered as a business and transportation hub to a large rural population area.

The Montana Cadastral website lists a construction date of 1935 for this building at the corner of 1st Ave East and 2nd Street East, and Sanborn Maps for the town support this – in 1920 there were two small dwellings identified on this property, and by 1944 the maps clearly depict this building, labeled as an oil and gas station. This station was a neighborhood fueling station, one of the smallest in town. It was owned and operated by Farmer's Union through the mid-20th century. Farmers Union operated the retail fueling business at the site from the 1960's until 1991. Contamination was first discovered in 1990 and at that time, contaminated soil was removed. Additional contamination was discovered in 1991. Farmers Union ceased operations at the site in 1991. The underground tanks were removed from the site in 1994. Farmers Union sent Montana Department of Environmental Quality (MDEQ) a letter in 1995 stating that all Board Members had resigned and Farmers Union had insufficient finances to conduct further work. In 1997, Musselshell County acquired the property through a tax deed. Between 1995 and 2005, the MDEQ Leaking Underground Storage Tank (LUST) Trust program commissioned three phases of remedial investigation and other activity.

During this time, contaminated soils were removed and monitoring wells were installed. Through 2011, MDEQ continued to utilize LUST funds to monitor the site for petroleum hydrocarbons associated with the original release.

Following its period of operation as a service station, the building was converted into two commercial spaces. For the past decade the building has housed the Musselshell County Food Bank and The Golden Thimble clothing and thrift store, providing essential food and clothing to the community, serving over 300 families monthly. In 2014, the county determined to move these programs to a former grocery store, known as “The Panther’s Den” behind Roundup Central School, and close operations here. Since that time this property has been vacant. In August of 2019, Weston Solutions completed a Hazardous Materials Survey Report for SMDC which identified the following contaminants were present at the site: asbestos-containing construction materials (ACM), lead based paint, a mercury containing thermostat and potentially one polychlorinated biphenyl (PCB) containing ballast.

The building is in poor shape and is not currently habitable. The county plans to demolish the building and redevelop it into a commercially leased lot.

PREVIOUS ENVIRONMENTAL INVESTIGATIONS AND SUMMARY OF ENVIRONMENTAL CONDITIONS

The following environmental site assessments/investigations and cleanup plans have been completed for the Site:

1. Hazardous Materials Survey Report – Former Farmers Union, Roundup, MT; prepared by Weston Solutions, August 20, 2019 – (51 pgs.)
2. Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation, Former Farmers Union, Roundup, MT, Prepared by WWC Engineering, July 29, 2020 (5 pgs.)
3. Sampling and Analysis Plan for Confirmation Samples at Former Farmers Union, Roundup, MT, Prepared by WWC Engineering, July 29, 2020 (103 pgs.)

The results of the Hazardous Materials Survey Report, dated August 20, 2019 confirmed the presence of asbestos-containing material (ACM), lead based paint, a mercury containing thermostat and potentially one polychlorinated biphenyl (PCB) containing ballast. These contaminants of concern (COC’s) need to be properly addressed prior to the building being demolished.

The purpose of this project is to eliminate the potential exposure of the public, Musselshell County personnel, and contractors to these materials, and to facilitate the renovation of the property by lowering the cost of remediation for Farmers Union. 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.

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA) PROPOSED REMEDIATION PLAN

As part of the Snowy Mountain Development Corporation's Brownfields Program, WWC Engineering completed a Draft Analysis of Brownfields Alternatives (ABCA) dated July 29, 2020 to evaluate potential cleanup alternatives for the Site. To satisfy EPA requirements, the effectiveness, feasibility (implementability), and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

EVALUATION OF CLEANUP ALTERNATIVES

To address contamination at the Site there are three different alternatives considered:

Alternative #1: No Action,

Alternative #2: Remediation/Abatement of ACM, Mercury Containing Equipment and PCB containing equipment, removal of all LBP prior to building demolition.

Alternative #3: Remediation/Abatement of ACM, Mercury Containing Equipment and PCB containing equipment and complete demolition of the building.

To satisfy EPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

EFFECTIVENESS – INCLUDING CLIMATE CHANGE CONSIDERATIONS

Alternative #1: No Action is not effective in stopping the health risks from the identified COCs at the contaminated Site. The Site is in a commercial area and needs to be remediated.

Alternative #2: Abatement of building hazardous materials through the removal of ACM, mercury containing equipment, and demolition of LBP prior to full building demolition.

Alternative #3: Abatement of building hazardous materials through removal of ACM, mercury containing equipment and PCB containing equipment then complete demolition of the building. (No demolition of LBP in the building)

IMPLEMENTABILITY

Alternative #1: No Action is easy to implement since no actions will be conducted.

Alternative #2: Removal/Abatement of all Hazardous Materials from the Site:

- Based on the results of the Hazardous Material Survey, the following recommendations were made by Weston Solutions. These are standard abatement procedures for the COCs and are easy to implement using contractors with the appropriate training.
 - Contracting an accredited asbestos remediation company to address the ACM at the Site during the cleanup phase of demolition (e.g. abatement). ACM must be removed before any demolition activities begin to prevent ACM from becoming friable. ACMs are present only in the roofing materials, which are considered non-friable. Roof removal should be performed to maintain the non-friable status of the ACM. If materials remain non-friable then disposal can be done using a class II landfill. Care must be taken during the removal process and workers must be made aware of the ACM present. Proper protective measures must be taken.
 - Contracting an accredited lead remediation company to address the LBP at the Site during the cleanup phase of demolition. Under this alternative all the LBP would be demolished separate from standard building demolition. All work performed should be done so by an EPA

- Lead-Safe certified firm. Dust control methods should be implemented for the debris. The disposal facility should be contacted ahead of time to determine if Toxicity Characteristic Leaching Procedure (TCLP) samples will be required.
- Mercury containing equipment should be properly removed.
- PCB containing equipment should be properly removed.
- ACM clearance sampling should be completed in accordance with the Sampling and Analysis Plan (WWC Engineering 2020).
- LBP soil confirmation sampling should be completed after building demolition.

Alternative #3: Removal/Abatement of ACM only from the Site and building demolition:

- The abatement procedures would have the same level of implementability as Alternative #2, with the exception of LBP specific demolition. Building demolition would be performed without prior LBP removal.
- Contracting an accredited asbestos remediation company to address the ACM at the Site during the cleanup phase of demolition (e.g., abatement). ACM must be removed before any demolition activities begin to prevent ACM from becoming friable. ACMs are present only in the roofing materials, which are considered non-friable. Roof removal should be performed to maintain the non-friable status of the ACM. If materials remain non-friable then disposal can be done using a class II landfill and disposed of as construction waste. Care must be taken during the removal process and workers must be made aware of the ACM present. Proper protective measures must be taken.
- Mercury containing equipment should be properly removed.
- PCB containing equipment should be properly removed.
- ACM clearance sampling should be completed in accordance with the Sampling and Analysis Plan (WWC Engineering 2020).
- LBP soil confirmation sampling should be completed after building demolition.

COST

Alternative #1: No Action and no cost.

Alternative #2: The total cost estimate for this alternative is **\$25,373.85**.

Alternative #3: The total cost estimate for this alternative is **\$23,955.38**.

RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup alternative is **Alternative #3:** Remediation/abatement of ACM, mercury containing equipment, removal of PCB ballast light fixtures and building demolition. Alternative #1, No action does not provide any health protections or remove the hazardous building materials from the site. Alternative #2 requires special attention be given to the LBP hazards before building demolition. There would be added safety concerns for LBP demolition since removal of the roof section containing ACM could reduce the structural integrity of the building. The roof removal must be performed first in order to reduce the potential for creating friable ACM materials during LBP demolition. Therefore, additional safety precautions would be required with Alternative #2. This will ensure the LBP hazard is completely addressed and the hazards eliminated after the demolition is completed. For these reasons, Alternative #3 is the recommended alternative.

GREEN AND SUSTAINABLE REMEDIATION MEASURES FOR SELECTED ALTERNATIVE

To make the selected alternative greener, or 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 cleanup contractor to follow an idle-reduction policy and use heavy equipment with advanced emissions controls operated on ultra-low sulfur diesel. The number of mobilizations to the Site would be minimized and erosion control measures would be used to minimize runoff into environmentally sensitive areas.

COMMUNITY PROFILE

The former Farmers Union property is located in Roundup, Montana, the Musselshell County Seat. Roundup's population estimates from Headwaters Economics' Economic Profile System (EPS) for 2018 is 1,817 with a median age of 39.4 years and an estimated median household income of \$31,071.

Population	1,817
Households	774
Female Population	52%
Male Population	48%
Median Household Income	\$31,071
Per Capita Income	\$19,103

Data Source: Headwaters Economics' Economic Profile System (EPS)
<https://headwaterseconomics.org/eps>, accessed May 26, 2020

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. Certain asbestos-containing materials and lead paint in the building are in poor condition that could cause the release of asbestos fibers to the air, and lead paint chips to building floors and surfaces.

PROPERTY REDEVELOPMENT PLANS

The Former Farmers Union property is located in a residential area directly adjacent to downtown on the corner of 1st Avenue East and 2nd Street East in Roundup, MT.



Short-term redevelopment plans are to demolish the remaining structure located on the property to allow for open space.

Long-term redevelopment plans include the Musselshell FEMA Buyout properties, partnering with the City of Roundup and possibly Montana Fish, Wildlife and Parks to incorporate this property as part of a larger recreational corridor trail system with possibly tent camping and fishing access sites. The county has secured funding from a separate grant to solicit proposals for a concept development plan that will involve the community in the planning process to meet these goals.

BENEFITS TO THE COMMUNITY

Currently, the building sit abandoned on the property. This has led to the deterioration in the condition which is progressively becoming an eyesore as well as a location for frequent deviant activity. The deterioration has led to hazardous conditions in the interior of the buildings. Asbestos materials are becoming deteriorated leading to the possible disbursement of asbestos fibers into the air, lead paint is chipping and peeling off causing a dispersion of lead, and mold is growing on the interior of the buildings. The mold is facilitated by wet conditions in many of the buildings due to rainwater getting in and possible seepage of groundwater from groundwater.

The Roundup community will 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 property; fourth, the cleanup of the building will advance the conversion of the site from a community eyesore into a community asset.

PUBLIC COMMUNICATION

Overall, the current landowner and general 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

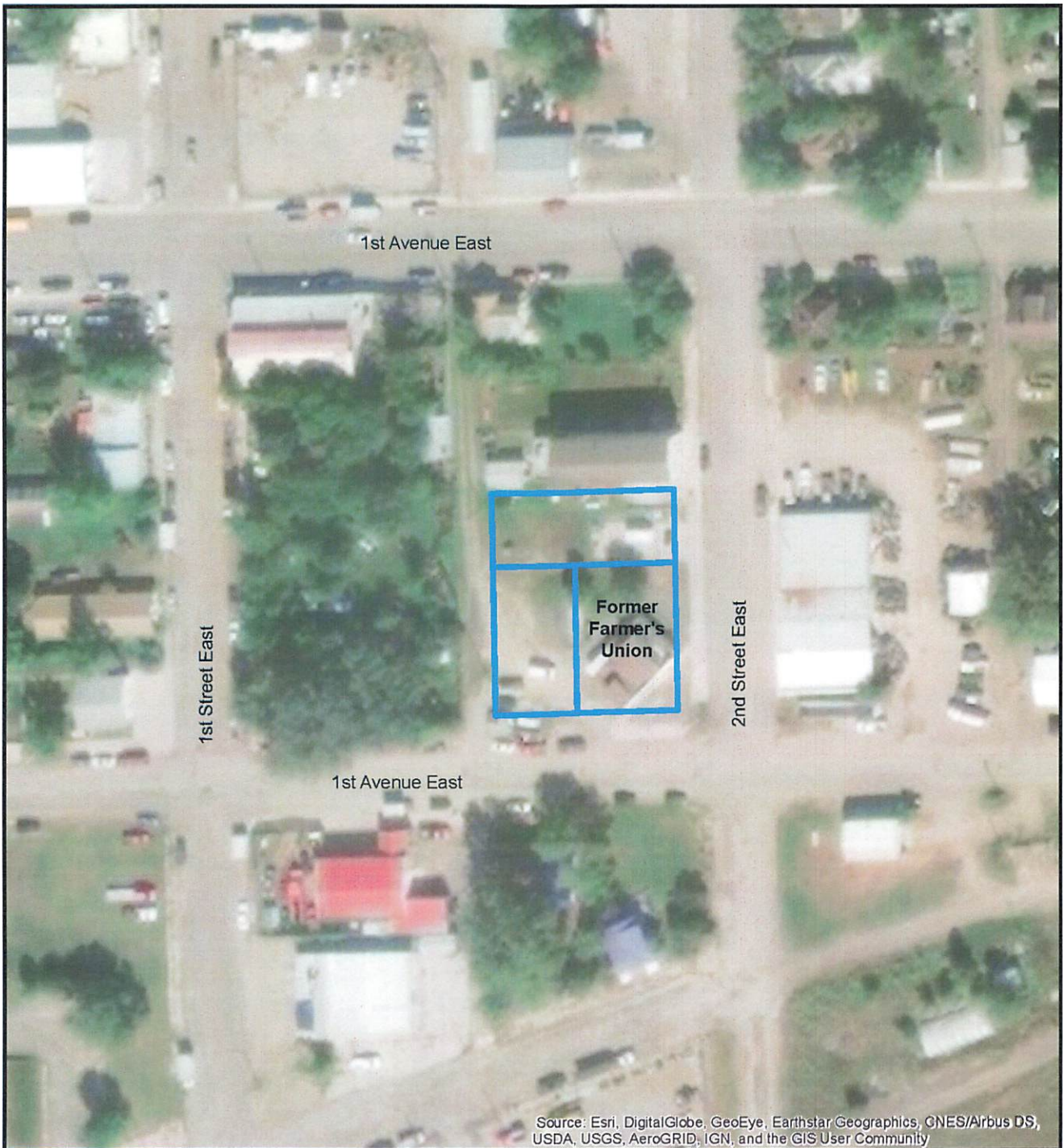
Entity	Name	Title	Address	Phone Number	Email Address
Media Contact	Roundup Record-Tribune & Winnett Times	Advertising Department	343 Main Street Roundup, MT 59072	(406) 320-0322	rtnews@midrivers.com
Musselshell County	Nicole Borner	Chair, Musselshell County Commissioners	506 Main Street Roundup, MT 59072	(406) 323-1104	nborner@co.musselshell.mt.us
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
MT DEQ	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

Hazardous Materials Survey Report – Former Farmers Union, Roundup, MT; prepared by Weston Solutions, August 20, 2019 – (51 pgs.)

Montana Property History Record – Golden Thimble – Musselshell County Food Bank, Montana State Historic Preservation Office, prepared by Montana Preservation Alliance, October 1, 2019. (8 pgs.)

MAP 1: Overview of Site Location Area



Legend

 Parcel Boundary

0 50 100 200 Feet



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Figure 1 - Site Vicinity Map
Former Farmer's Union
101 2nd Street East
Roundup, MT