

**Community Relations
Plan
Brownfields Cleanup and
Redevelopment of the
Lavina School Boiler Room
Renovation**

214 1st Street East, Lavina, Montana

February 27, 2023



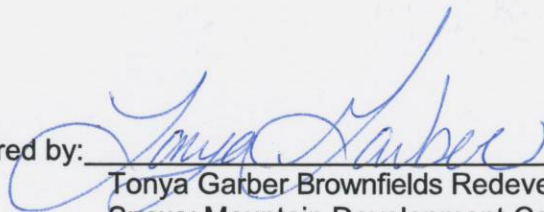
Prepared by:



**Snowy Mountain Development Corporation
507 West Main Street, Lewistown, MT
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**Lavina School Boiler
Room Renovation
Community Relations Plan**
214 1st Street East, Lavina, Montana

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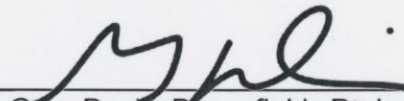


Tonya Garber Brownfields Redevelopment Manager
Snowy Mountain Development Corporation

3/1/2023

Date

Approved by:



Greg Davis, Brownfields Project Manager
U.S. Environmental Protection Agency, Region VIII

2/28/2023

Date

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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	Lavina K-12 School, Lavina, 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 Lavina School Boiler Room Renovation located at 214 1st Street East, Lavina, Montana (hereafter referred to as the Site). This CRP outlines how SMDC has involved, and will continue to involve the community, the school board, 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 WGM Group, Inc. Project Manager Tyler Etzel, 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. Etzel may be contacted at TETZEL@WGMGROUP.COM or (406) 240-7795.

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);
- Phase II Limited Scope-Environmental Site Assessment;
- 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 Town of Lavina. These meetings will be coordinated with the Lavina School Board 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 Lavina High School District No 2, which is locally known as the Lavina K-12 School located at 214 1st Street East, Lavina, Montana. The legal description: Lavina Original Townsite, S02, T06N, R22 E, Block 10, Lot 7-12. Acres of the property: 0.964 acres.

The Lavina School is a 2 ½-story public school building built in 1918. It is a 2 ½ story wood-framed structure with a flat roof and brick masonry on all sides. Each floor occupies approximately 4,500sf. A 17,000sf, 1-story, wood-framed, gabled roof addition was built in 1997 to the south and east of the historic building.

SITE HISTORY

The 1912 Sanborn map shows a “Public School” on the same lot, located immediately south of the school’s current location. This was replaced by a new school in 1915, soon destroyed by a fire on Valentine’s Day 1918. The fire was discovered around 8pm and by 10:30pm the building had been “entirely gutted, very little having been saved.” The 1915 school was built for approximately \$20,000 and insured for \$15,000. Construction of a new school was awarded for \$17,400 on May 14, 1918, to the Lavina contractor, Anton Jensen. Subcontracts for plumbing and electrical work were respectively awarded to Lavina businesses C.L. Tillman & Co. and Inman & Bailey. Work was slated to “begin at once” and property records indicate that it was completed in 1918. This building continues to operate as the core of the Lavina K-12 School and community. The school celebrated 100 years of educating students in 2015 and invited “all graduates 118 years of age and under to an all-class reunion.”

PREVIOUS ENVIRONMENTAL INVESTIGATIONS AND SUMMARY OF ENVIRONMENTAL CONDITIONS

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

1. Limited Scope Phase II Environmental Site Assessment – Lavina K-21 School, Lavina, MT; prepared by Tetra Tech Inv., April 11,2022 – (45 pgs.)
2. Sampling and Analysis Plan for Confirmation Samples at Lavina K-12 School, Lavina, MT, Prepared by WGM Group, LLC., February 7, 2023 (74 pgs.)
3. Analysis of Brownfields Cleanup Alternatives for Lavina School Boiler Room Renovation February 24, 2023 (15 pgs.)

No suspected Asbestos Containing Building Material (ACBM) was identified in the areas of the hot water system outside the boiler room observed during the Limited Scope Phase II Sampling. The boiler could not be sampled without causing damage, so it is assumed to contain ACBM. Assumed ACBM was identified in the following areas:

- Flange gaskets on piping throughout the boiler room (approximately 7 gaskets).

- Fire brick on the west side of the boiler interior (quantity unknown).

None of the parts of the boiler were dismantled or disturbed that may present a dangerous condition. Additional materials may be present in parts of the boiler that could not be observed during the inspection.

The purpose of this project is to abate potential ACBM's and eliminate the potential exposure of other harmful elements contained within boiler and the immediate vicinity.

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA) PROPOSED REMEDIATION PLAN

As part of the Snowy Mountain Development Corporation's Brownfields Program, WGM Group LLC., completed a Draft Analysis of Brownfields Alternatives (ABCA) dated February 24, 2023 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: ACBM abatement of the boiler during its removal from the boiler room.

Alternative #3: ACBM abatement of the boiler during its removal from the boiler room; then ACBM abatement of the boiler room followed by renovation. It is assumed that any waste will be characterized as non-hazardous and will not require removal and disposal at a hazardous waste facility.

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 Actions is not effective at mitigating potential hazards that would need to be addressed for any reuse of the Site.

Alternative #2: Abatement of ACBM associated with the boiler prior to renovation of the boiler room is an effective method for preventing receptors from coming into direct contact with hazardous material related to boiler removal; as long as no subsequent construction or renovation activities occur following abatement and removal of the boiler.

Alternative #3: Abatement of ACBM associated with the boiler and the boiler room prior to removal of the boiler and renovation of the boiler room is an effective method for preventing receptors from coming into direct contact with hazardous material.

IMPLEMENTABILITY

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

Alternative 2: Abatement of ACBM prior to and during boiler removal is implementable.

Alternative 3: Abatement of ACBM prior to boiler removal and boiler room renovation is implementable.

COST

Alternative #1: No Action would have no associated cost.

Alternative #2: Abatement of ACBM prior to removal of the boiler is estimated to be \$29,858.00. This alternative is not considered cost effective because abatement and removal of the boiler will not allow SMDC to meet the goal of repurposing the boiler room into storage space.

Alternative #3: Abatement of ACBM during boiler removal and of the boiler room after removal and renovation is estimated to be \$34,716.00. This alternative is considered cost effective because removal of the boiler and renovation of the boiler room will allow SMDC to repurpose the boiler room into storage space.

RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup alternative is **Alternative #3:** Alternative #3 would encapsulate and remove ACBM in the boiler and the boiler room and the entire boiler room could be renovated. Waste stream materials during renovation would be taken to the nearest local landfill that accepts ACBM. The advantages of this alternative are that ACBM is safely encapsulated/removed from the boiler and boiler room and properly disposed; and the Site can subsequently be repurposed into storage space. Some minor disadvantages of this alternative include the potential exposure of environmental hazards during construction, transport, and disposal of hazardous materials and a negative environmental impact with generation of boiler room materials disposed in the local landfill along with heavy equipment emissions during the construction.

GREEN AND SUSTAINABLE REMEDIATION MEASURES FOR SELECTED ALTERNATIVE

In accordance with EPA's Green Remediation Best Management Practices: Excavation and Surface Restoration (EPA, 2019), remedial alternatives utilizing dust suppression techniques will use tarps to cover spoils piles where possible, thereby reducing water use at the site. Disposals will be selected as close to the site as possible, to minimize transport time and distance, and expenditure of fuels in trucking. Backfill will be acquired from sources as close as practicable to the site, to minimize fossil fuel expenditure. Loads will be covered to prevent disposition of waste and/or backfill soils along the trucking route. Based on the current information available about the Site, assumed/potential ACBM requires a cleanup alternatives evaluation.

COMMUNITY PROFILE

The Lavina K-12 School is located in Lavina, Montana, in Golden Valley County. Lavina's population estimates from the US Census Bureau is 157 with a median age of 52.6 years and an estimated median household income of \$48,250.

Population	157
Households	81
Female Population	55%
Male Population	45%
Median Household Income	\$48,250
Per Capita Income	\$28,335

Data Source: U.S. Census Bureau (2020)
<https://uscensusreporter.org>, accessed November 14,2022

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 and maintaining the boiler and the boiler room. Certain asbestos-containing materials if disturbed could cause the release of asbestos fibers to the air.

PROPERTY REDEVELOPMENT PLANS

The subject property is in a predominantly rural area with limited urban development. The subject property currently operates as a school. Lavina School was awarded a Community Development Block Grant (CDBG) for a new heating, ventilation, and air conditioning (HVAC) system. The current coal fired boiler will be retired, and the new system will be constructed in a different location within the building. The boiler is approximately 7 feet by 8 feet by 10 feet. After the boiler has been removed, the school plans to renovate the current boiler room and use the room for storage.

BENEFITS TO THE COMMUNITY

Currently, the building is being utilized as the K-12 School for the town of Lavina. The community will benefit from this project in a couple of ways. First, the removal of the potential asbestos containing materials from the Boiler room will halt the potential release and spread of the asbestos within the building. This will reduce threats to human health especially that of the younger population. Secondly, the removal and cleanup/renovation of the boiler and boiler room will aid the school in updating the overall use of the building. The funding of this abatement will also help alleviate some of the burden of the new heating and cooling system and the removal and retirement of an old boiler. A need of a healthier, more efficient system is apparent for this building that was originally constructed in 1918. This new system will hopefully lower the utility costs associated with the building and enable the school to make better use of the space where the boiler currently resides.

PUBLIC COMMUNICATION

Overall, the current School Superintendent, Nicole Hanson and other school staff, through various correspondence and meetings, have stated that they would like to see the Site remediated to permit redevelopment and to safeguard human health.

COMMUNICATION OUTREACH

SMDC will host a public presentation with the School Board and citizen participation.

SMDC updates Site and project status information on its organizational website:

www.snowmountaindevelopment.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/snowmountaindevelopment>.

SMDC staff also upload photos and project information on its Facebook page:

www.facebook.com/snowmountaindevelopment 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
Lavina School District	Nicole Hanson	Super Intendent	214 1 st Street East Lavina, MT 59046	(406) 320-0777	nhanson@lavinapublicschools.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
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

Limited Phase II Environmental Site Assessment for Lavina School – of Lavina MT; prepared by Tetra Tech Inc., April 11, 2022 (45 pgs.)

Montana Property History Record – Lavina K-12 School District No. 2 – Golden Valley County, Montana State Historic Preservation Office, prepared by DKAL, PLLC, January 17, 2023. (13 pgs.)

Site-Specific Sampling and Analysis Plan for Air Clearance Sampling - WGM Project Number: 20-09-16.1 – Lavina School Boiler Room Abatement, prepared by WGM Group LLC., February 7, 2023 (74 pgs.)

Analysis of Brownfields Cleanup Alternative (ABCA) - Lavina School Boiler Room - WGM Project Number: 20-09-16.1 - Prepared by WGM Group LLC., February 24, 2023 (15 pgs.)

