

**Community Relations Plan  
Brownfields Cleanup and Redevelopment  
of the Petroleum County Courthouse Renovation  
302 East Main Street  
Winnett, MT**

**March 11, 2025**




**Prepared by:**



**Snowy Mountain Development Corporation  
507 West Main Street, Lewistown, MT 59457**

**Petroleum County Courthouse Renovation  
Community Relations Plan**

**302 East Main Street, Winnett, Montana**

Prepared by:   
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Snowy Mountain Development Corporation

3/12/2025  
Date

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

3/11/2025  
Date

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### MAPS

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**MAP 1**      Site Location Map

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## LIST OF ABBREVIATIONS AND ACRONYMS

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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 Petroleum County Courthouse property located at 302 East Main Street in Winnett, 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, Tonya Garber, SMDC Redevelopment Director, Tiffany Ward, 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](mailto:HUDSON@SNOWYMOUNTAINDEVELOPMENT.COM) or (406) 535-2591.

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Mr. Grabinski may be contacted at: [KGRABINSKI@WWCENGINEERING.COM](mailto: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);
- 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 Petroleum County Courthouse located at 302 East Main Street, in Winnett, Montana. The legal description is: S06, T14 N, R27 E, WIN ORIGINAL BLOCK 7 LOTS 10,11,12

### SITE HISTORY

The Site is reported to have been constructed in 1917 as a commercial structure that housed a bank, offices, a printing company, and a hardware store until 1928 when it was leased to Petroleum County and in 1942 was converted to a courthouse. This site is

recorded on the National Register of Historic Places as the Winnett Block. This building displays a sandstone block exterior with a late 19<sup>th</sup> and early 20<sup>th</sup> century American Movement with a western commercial style of architecture. The building is currently used as the county courthouse on the street level. The basement is used by the County Sheriff's office (previously located on the second story) while the second story is currently vacant.

The County has requested assistance from SMDC for the remediation of asbestos-containing materials (ACM) and lead-based paint (LBP) in order to renovate the second story of the structure to provide low-income housing for the community.

As part of the investigative process, the Petroleum County Commissioners ordered a Phase I Environmental Site Assessment in October, 2022 and a Phase II Environmental Site Assessment draft in November 2022, and a revision to the Phase II completed in January 2023 with an addendum finalized in April 2024. The findings in these assessments listed chrysotile asbestos in the roofing mastic of an exterior stairway, on the window glazing of the north side windows, and in blue and green floor tiles on the second floor. The Phase II also identified Asbestos containing vermiculite insulation in the roof insulation of the building. The purpose of the Phase II addendum was to evaluate the roof of the Petroleum County Courthouse, which was not part of the initial Phase II ESA. The findings concluded that roofing tar, paint, and roofing material contained high levels of asbestos throughout. Lead based paint was also identified on the skylight frame and on the window sills and trim on the exterior 2<sup>nd</sup> floor windows using a XRF spectrometer.

The purpose of this project is to eliminate the potential exposure of the public, future tenants, county personnel, and contractors to these materials, and to facilitate the renovation of the building by lowering the cost of remediation for the Petroleum County Courthouse. This Brownfields subgrant and loan 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 Petroleum County Courthouse property is located in Winnett, Montana, the Petroleum County Seat. Winnett's population is 173<sup>1</sup> with a median age of 51.9 <sup>2</sup>years and an estimated median household income of \$66,875<sup>3</sup>. The Site is located east of the downtown commercial area of Winnett.

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

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<sup>1</sup> <https://data.census.gov/table?t=Age+and+Sex:Populations+and+People&g=160XX00US3081100> (accessed 3/11/2025)

<sup>2</sup> <https://data.census.gov/table?t=Age+and+Sex:Populations+and+People&g=160XX00US3081100> (accessed 3/11/2025)

<sup>3</sup> <https://data.census.gov/table?t=Income+and+Poverty&g=160XX00US3081100> (accessed 3/11/2025)

# PROPERTY REDEVELOPMENT PLANS

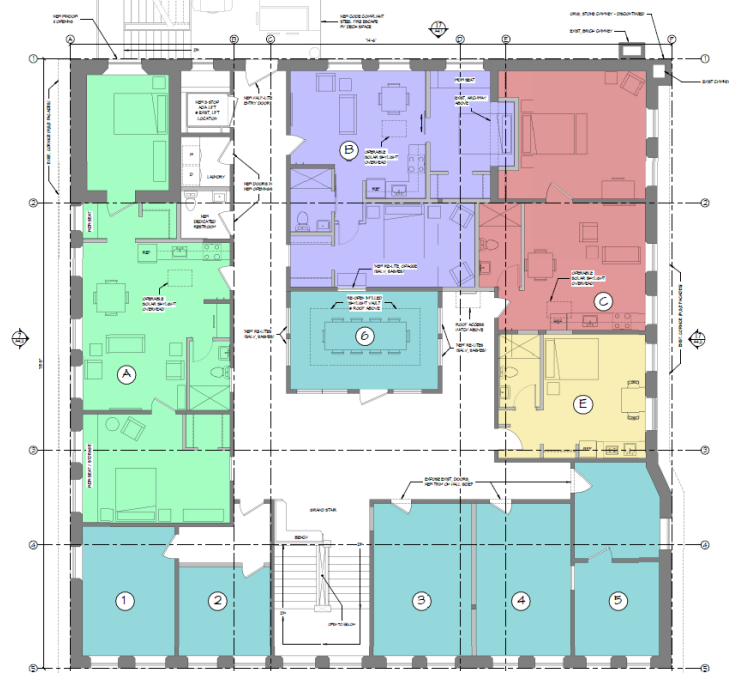
The Petroleum County Courthouse dominates a corner lot at the east end of Main Street. The courthouse stands out as the 2<sup>nd</sup> largest building in town and is located on the northeast corner of Main Street and Ashley Avenue in the northeast portion of the town. The 1917 building faces south, fronting Main Street, with the west elevation functioning as a secondary facade.

COLOR KEY - SECOND FLOOR, OPTION 'A'

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- SUITE 2 - 126 SF
- SUITE 3 - 230 SF
- SUITE 4 - 222 SF
- SUITE 5 - 240 SF
- CONFERENCE RM 6 - 220 SF
- DEDICATED OFFICES RESTROOM - 36 SF
- APARTMENT 'A' - 2 BDRM @ 635 SF PLUS BASEMENT STORAGE UNIT
- APARTMENT 'B' - 2 BDRM @ 603 SF PLUS BASEMENT STORAGE UNIT
- APARTMENT 'C' - 2 BDRM @ 500 SF PLUS BASEMENT STORAGE UNIT
- APARTMENT 'E' - STUDIO @ 272 SF PLUS BASEMENT STORAGE UNIT
- DEDICATED SHARED LAUNDRY - 30 SF
- NEW WALL
- EXISTING WALL

• FINISH FLOOR  
• FINISH CEILING



2<sup>nd</sup> Floor Remodel Plan

The Petroleum County Courthouse is a solid architectural element in the town and retains much of the original design intent, conveys its historic associations, and is in overall good condition. There are no landscape features surrounding the building. A metal shop and an open gravel lot used for parking occupy the space north of the building, while a historic hardware store sits five feet to the east. A sidewalk runs east-to-west in front of the building. To the west of the courthouse, across Ashley Street, is an empty lot and to the south, across Main Street, is a residence.

The County is working with High Plains Architects, Stahly Engineering, and TW Ridley Construction to renovate the building and build 4 low-income housing units on the 2<sup>nd</sup> floor. This renovation will help fill in the gap in the workforce housing shortage Winnett MT is experiencing. Conversations with some of the locals have identified that the school has a difficult time retaining teachers in the area because of the lack of housing. This has a negative impact on the younger generation, future workforce, and local economy of the town of Winnett.

## BENEFITS TO THE COMMUNITY

Currently, the 2<sup>nd</sup> floor of the building is vacant. The overall condition of the 2<sup>nd</sup> floor is fair/poor. There is flaking LBP and overall deterioration setting in due to the lack of use, and the water intrusion caused by the gaps around the skylight.

The Winnett community will additionally benefit from this project in four primary ways. First, the removal of the hazardous substances and asbestos-containing materials from the building will halt the release and spreading of these substances within the building; second, the removal of the hazardous substances and asbestos-containing materials from

the building 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 housing unit development; fourth, the cleanup of the building will assist in the utilization of the building to 100% of its capacity, and offering a much needed solution to Winnett's housing needs.

## **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 March 10, 2025, to evaluate potential cleanup alternatives for the Site. To satisfy USEPA requirements, the effectiveness, ability to implement, and cost analysis 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 County's intention to renovate the structure and construct the LMI housing units. ACM and LBP will have to be disturbed to facilitate the renovation.

**Effectiveness:** No action is not effective in preventing the health risks from the identified COCs at the contaminated Site. It also does not allow the County to renovate the structure and does not prevent on-going damage to the interior of the structure from water intrusion through the roof around the leaking skylight framing.

**Implementability:** There are no barriers or requirements for implementation as no action will be taken.

**Cost:** No action necessitates no direct cost for abatement. Long-term costs could include administration and management of contamination onsite and ongoing repair costs associated with the leaking roof that is damaging the interior of the building.

**Alternative #2: Removal/Abatement of ACM on Second Floor and Roof with Removal and Disposal of Windows Painted with LBP** - This alternative proposes that ACM present within the second story of the building and on the roofs would be abated and properly disposed at a permitted facility. A replacement membrane roof will be installed on the structure. Window components with hazardous concentrations of lead on the exterior would be removed, containerized, and disposed of at a hazardous waste landfill, if TCLP determines the waste is hazardous.

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

**Effectiveness:** This alternative is effective in the Removal/Abatement of ACM from the second story and roof combined with the removal and disposal of window components



containing LBP will be the most effective at removing all known health risks and environmental hazards associated with hazardous building materials impacted by the planned renovation. However, the removal and disposal of the original windows makes the Site ineligible for historic tax credits.

**Implementability:** All ACM located on the second story and roofs would be abated and removed from the structure. Based on the results of the asbestos inspection, standard protocols for removal of ACM would be implemented. Standard abatement procedures for ACM are straightforward for properly trained contractors. Contracting an accredited asbestos remediation company to address the ACM at the Site during the cleanup phase of redevelopment (e.g., abatement is a requirement for Alternative #2). ACM remediation is recommended prior to any repurpose of the Site. ACM clearance sampling would be completed in accordance with an approved SAP. The interior skylight framing containing LBP would be removed and disposed of as nonhazardous or hazardous waste, as needed based on TCLP sampling. The window components containing LBP would be removed and disposed of as nonhazardous or hazardous waste, as needed based on TCLP sampling. The Site could be accessed by standard contractors or members of the public following ACM clearance and lead wipe samples showing compliance for HUD

**Cost:** The total abatement cost estimate for this alternative is **\$172,884**.

### **Alternative #3: Removal/Abatement of ACM on Second Floor and Roof with**

**Disposal of LBP from Windows.** This alternative proposes that ACM present within the second story of the building and on the roofs would be abated and properly disposed of at a permitted facility (same as Alternative #2). A replacement membrane roof will be installed on the structure. Window components with LBP on the exterior would be scraped to remove the loose and flaking LBP for disposal at a hazardous waste landfill, if TCLP determines the waste is hazardous. The historic windows would remain in place to ensure the project is eligible for historic tax credits.

**Feasibility:** This alternative is feasible and meets the state and federal requirements and allows the County to pursue Historic Tax Credits to aid in the project completion.

**Effectiveness:** Removal/Abatement of ACM from the second story and roof combined with the removal and disposal of loose and flaking LBP from the exterior of window components is effective at removing all known health risks and environmental hazards associated with hazardous building materials impacted by the planned renovation. The removal and disposal of loose and flaking LBP from the exterior of the original windows allows the County's general contractor to renovate the existing windows and ensures the project is eligible for historic tax credits.

**Implementability:** All ACM located on the second story and roofs would be abated and removed from the structure. Based on the results of the asbestos inspection, standard protocols for removal of ACM would be implemented. Standard abatement procedures for ACM are straightforward for properly trained contractors. Contracting an accredited asbestos remediation company to address the ACM at the Site during the cleanup phase of redevelopment (e.g., abatement is a requirement for Alternative #2). ACM remediation is recommended prior to any repurpose of the Site. ACM clearance sampling would be completed in accordance with an approved SAP. The interior skylight framing containing

LBP would be removed and disposed of as nonhazardous or hazardous waste, as needed based on TCLP sampling. The window components containing LBP would be scraped to remove loose and flaking LBP for disposal as nonhazardous or hazardous waste, as needed based on TCLP sampling. The Site could be accessed by standard contractors or members of the public following ACM clearance and lead wipe samples showing compliance for HUD lead standards from the floor of the room with the skylight.

**Cost:** The total abatement cost estimate for this alternative is **\$194,389**.

The recommended cleanup alternative is **Alternative #3 Removal/Abatement of ACM on the Second Floor and Roof with Hazardous Materials Disposal of LBP from Windows**. The alternative would target ACM and LBP on the Site that will be impacted by the planned renovation. Alternative #3 would most effectively use Brownfields cleanup funding in conjunction with other funding available to the County to cost-share the renovations. Keeping the original windows facilitates the use of historic tax credits to fund future renovations.

### **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. The Owner 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 will 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.

SMDC has posted the ABCA (Analysis of Brownfield Cleanup Alternatives) on social media platforms: Facebook and LinkedIn. As of 3/11/2025 we have recorded 234 views, and reached 113 organizations. No comments or feedback has been received as of the creation of this document. An outlet for public notice and feedback will remain available for a minimum of 2 weeks, and all correspondence received will be documented and filed in SMDC's project files for the Petroleum County Courthouse. All questions will be addressed in a timely manner.

## **COMMUNICATION OUTREACH**

SMDC updates Site and project status information on its organizational website: [www.snowymountaindevelopment.com](http://www.snowymountaindevelopment.com), and SMDC's Brownfields website: [www.smdcbrownfields.com](http://www.smdcbrownfields.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](http://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 #	Email
Petroleum County	Craig Iverson	County Commissioner	302 East Main Street, Winnett, MT 59087	406-429-5571	Craig.petroleum@gmail.com
Petroleum County	Paul McKenna	County Commissioner	302 East Main Street, Winnett, MT 59087	406-429-2121	Paulmck.petroleum@gmail.com
Petroleum County	Sig Pugrud	County Commissioner	302 East Main Street, Winnett, MT 59087	406-429-7801	spugrud@petroleummt.gov
State of Montana Fire Marshal	Adam Wajer	Deputy State Fire Marshal	PO Box 991, Great Falls, MT 59403	406-438-5664	awajer@mt.gov
MT DEQ	Jason Seyler	MT DEQ Brownfields Lead	PO Box 200901, Helena, MT 59620-0901	406-444-6447	jseyler@mt.gov
US EPA	Greg Davis	Brownfields Project Manager	US EPA, Region 8, 1595 Wynkoop Street, Denver, CO 80202	303-312-6184	Davis.gregory@epa.gov

## REFERENCES

Phase I Environmental Site Assessment for the Petroleum County Courthouse, Winnett; prepared by Tetra Tech, Inc., October 2022-START V, Contract No. 68HE082D0001, Task Order No. 82, Technical Direction No. 2204-12 (575 pgs.)

Phase II Environmental Site Assessment Revision 1 for the Petroleum County Courthouse, Winnett; prepared by Tetra Tech, Inc., January 2023 – (163 pgs.)

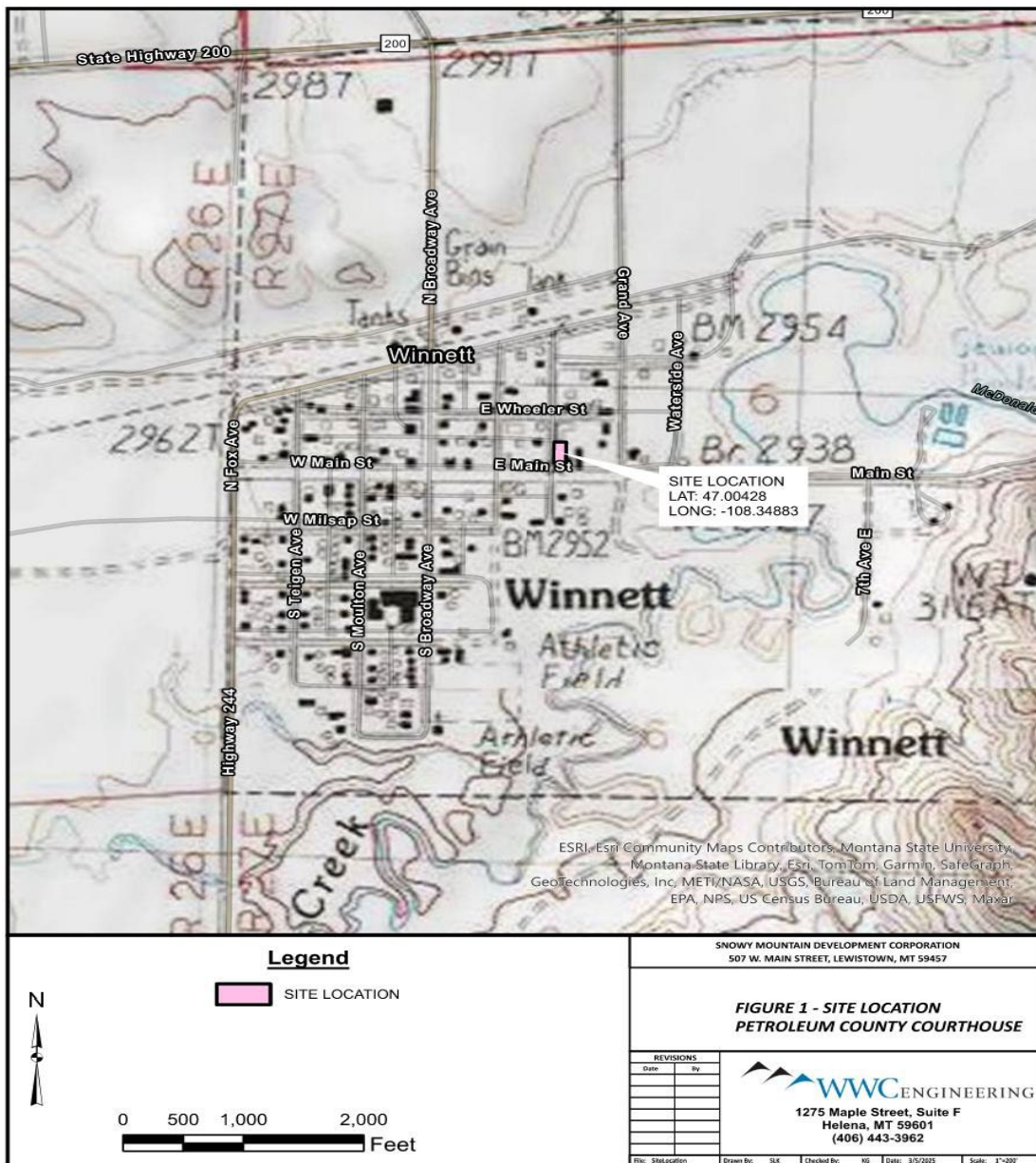
Addendum: Final Phase II Environmental Site Assessment for the Petroleum County Courthouse, Winnett; prepared by Tetra Tech, Inc., April 2024 – Montana DEQ Contract No.

421030, Task Order 1, Work Order 07 – (23 pgs.)

National Register of Historic Places, Registration Form – Winnett Block, August 2009 (63 pgs.)

Analysis of Brownfield Cleanup Alternatives for the Petroleum County Courthouse, Winnett; prepared by WWC Engineering, Inc., March 2025 – Snowy Mountain Development Corporation Work Order No. 16 (12 pgs.)

### MAP 1: Overview of location



**End of Document**

