



Northern Rocky Mountain
Resource Conservation & Development Area, Inc.

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Dear Ted Lanzano,

I write today to apprise you of the analysis of brownfields cleanup alternatives (ABCA) for the City of Lewistown's Paris Laundry property. The Central Montana Brownfields Coalition (CMBC) is working to deliver, from CMBC's Brownfields Revolving Loan Fund, a subgrant for asbestos abatement at the Paris Laundry buildings.

No one has been willing to buy, develop, or re-use the property because of the perception and presence of contamination on the property. The property has been vacant and unused for many years. The property faces a main entrance to the city of Lewistown and is an eyesore having negative impacts on the entire city.

The Preliminary Assessment and All Appropriate Inquiry conducted through the assistance of the Montana Department of Environmental Quality (MDEQ) have identified the asbestos containing materials that include the floor and siding tiles of these buildings. The recommendations included that the non-friable transite siding should be removed in accordance with Montana State DEQ standards prior to the demolition of these structures.

This property is located across the street from a city park and children's softball field. This property is the "gateway" to Lewistown from travelers to the north. The public has been involved in the project through news paper articles, monthly radio programs by Snowy Mountain Development Corporation (SMDC, a partner within CMBC) staff, SMDC's semi-monthly board meetings, discussion of the acquisition and assessments at city commission meetings since the summer of 2007. After weighing its options of improving the site or taking no action, the community has decided this project will be improved as a park, potential parking area for park activities, and an aesthetic "gateway" to Lewistown.

The MDEQ administers the state's Asbestos Control Program, including implementation of the U.S. Environmental Protection Agency's National Emission Standards for Hazardous Air Pollutants (EPA NESHAP). According to DEQ regulations, asbestos containing material (ACM) that will be impacted by renovation or demolition activities must be removed before demolition or renovation activities begin. DEQ prescribes the praxis of abatement, as well as the certification necessary to conduct abatement. For

these reasons, if asbestos will be impacted by a renovation or demolition, there are no real choices about methods of cleanup: a certified contractor will remove the asbestos as required by DEQ.

Accordingly, given DEQ regulations requiring removal of impacted asbestos, the City of Lewistown was faced with a dichotomous decision: proceed as planned, removing the asbestos containing material per DEQ regulations, or drop this project (i.e., “no action”). Given the level of investment that the community already has in improving the Paris Laundry property, the presumed efficacy of DEQ regulations for asbestos abatement, and the relatively straightforward steps necessary to remove the asbestos, the City of Lewistown elected to proceed, removing the asbestos containing material. The CMBC concurs that this was an appropriate decision.

According to Part IV(A)(1) of our Cooperative Agreement with EPA:

“The CAR shall prepare an analysis of brownfields cleanup alternatives which will include information about the site and contamination issues (i.e., exposure pathways, identification of contaminant sources, etc.); cleanup standards; applicable law; alternatives considered; and the proposed cleanup. The evaluation of alternatives must include effectiveness, implementability, and the cost of the response proposed. The evaluation will include an analysis of reasonable alternatives including no action. The clean up method chosen must be based on this analysis.”

Although no formal ABCA has been prepared by CMBC and/or the City of Lewistown, I believe that the intent of the ABCA provision has been met. NMCDC’s potential courses of action are limited by DEQ regulation of asbestos abatement to “go” or “no go.” I believe the City of Lewistown has adequately considered that choice utilizing the criteria established for ABCAs. If you disagree, please let us know. Barring any concerns on your part, we will include this letter in the administrative record for this project, and deem it to satisfy the ABCA requirement.

Thanks and best regards,

Travis Wright
Acting NRMRC&D Chairman