

TARGETED BROWNFIELDS ASSESSMENTS

How to get
the most bang
for the buck!

MT DEQ
Workshop
May 6-7, 2015
Mark Blanchard
START

AGENDA



- Does my site qualify for Brownfields
- Roles and responsibilities
- The TBA process
- Examples and lessons learned
- What can I do with TBA results?

**DOES MY SITE QUALIFY
FOR BROWNFIELDS?**

MUST MEET THE DEFINITION

- Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties protects the environment, reduces blight, and takes development pressures off greenspaces and working lands.

Web Site Resources

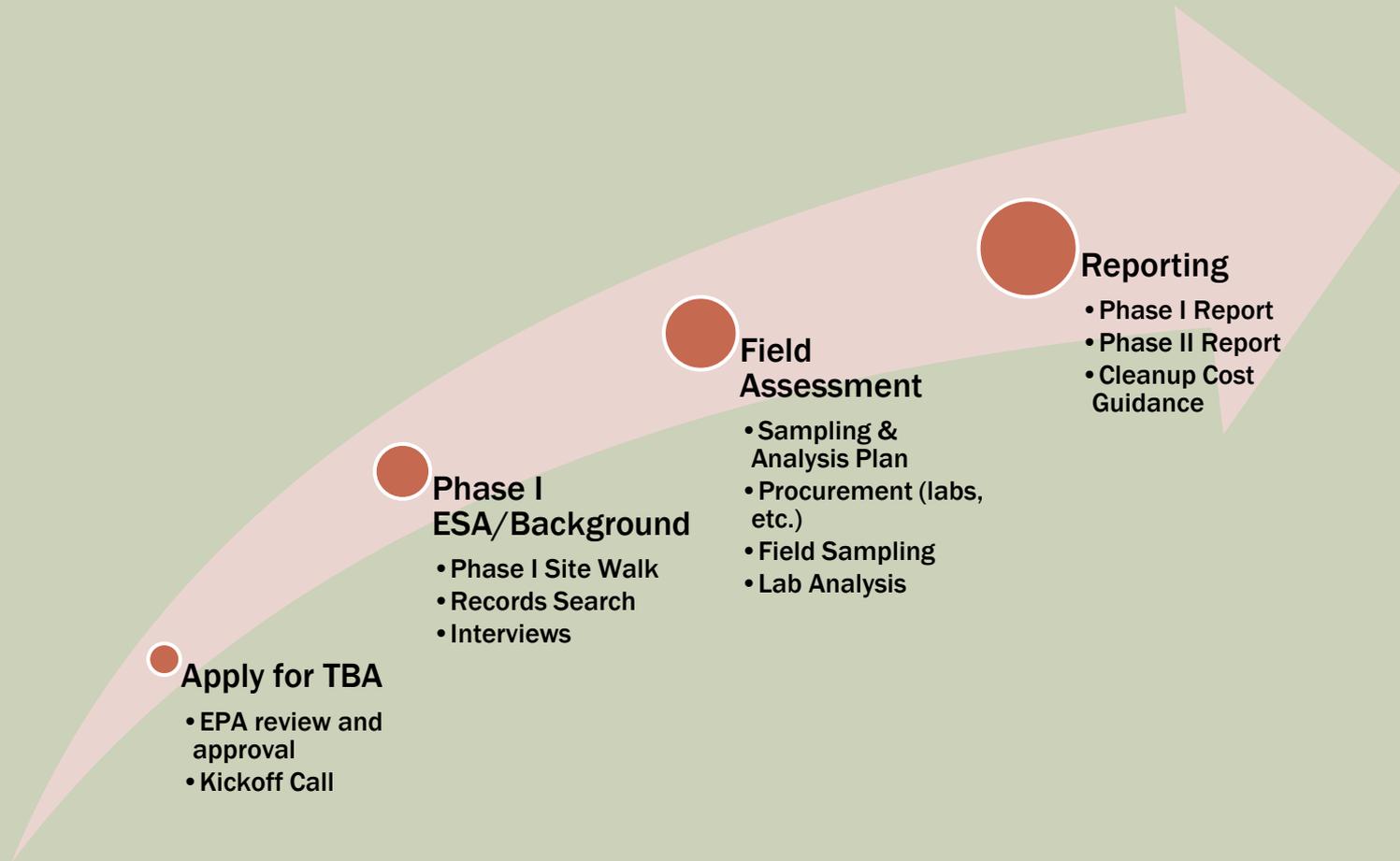
<http://www.epa.gov/brownfields/index.html>

<http://www2.epa.gov/region8/brownfields-region-8>

TBA MAY ENCOMPASS ONE OR MORE OF:

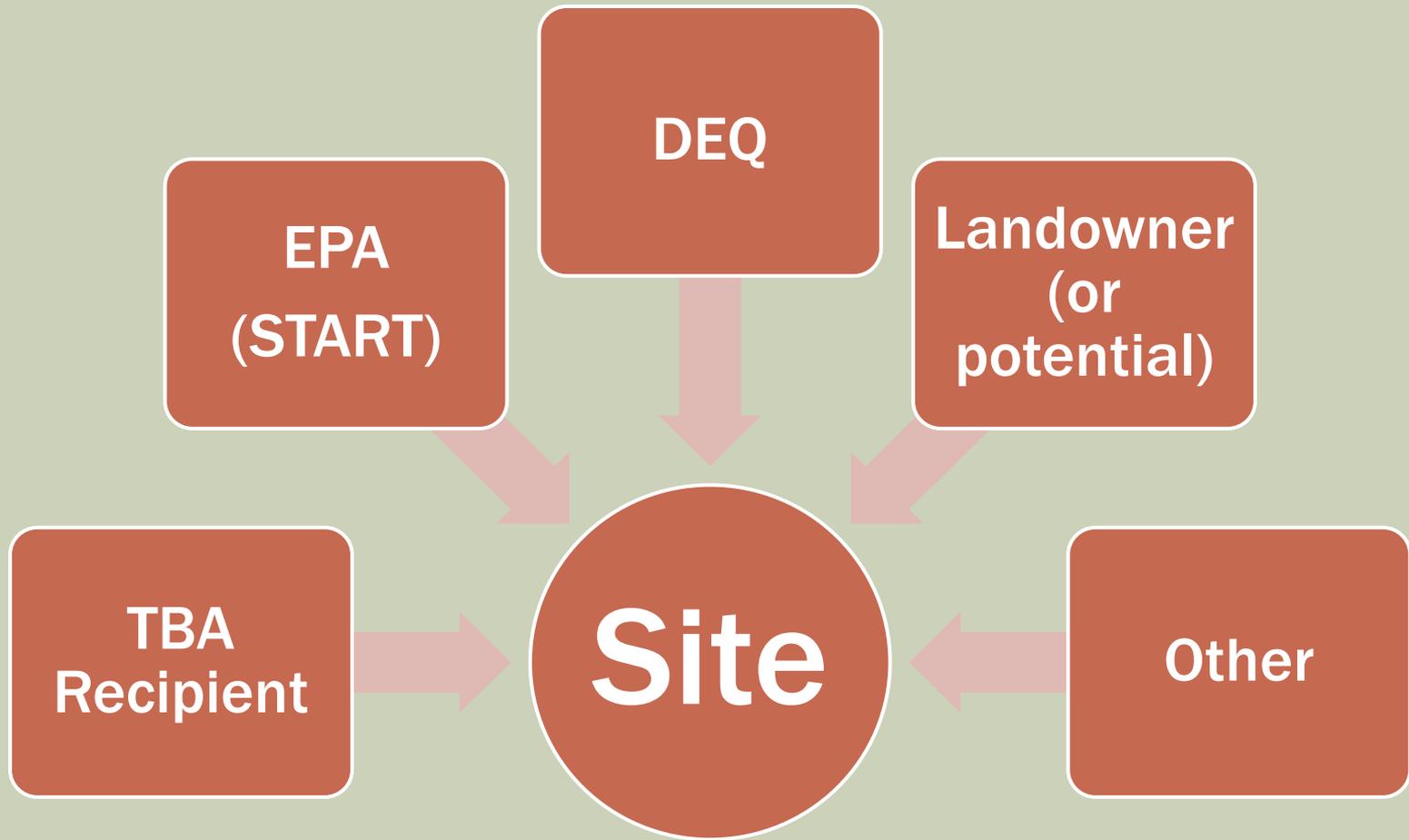
- An “all appropriate inquiry” assessment (Phase I or Transaction Screening Process), including a historical investigation and a preliminary site inspection;
- A more in-depth environmental site assessment (Phase II), including sampling activities to identify the types and concentrations of contaminants and the areas to be cleaned; and
- Evaluation of cleanup options and/or cost estimates based on future uses and redevelopment plans.

TBA PROCESS



ROLES AND RESPONSIBILITIES

SITE STAKEHOLDERS



TBA RECIPIENT

- Submits TBA application
- Provides site background, redevelopment goals, ownership/access concerns
- Provides site access
- Identifies other stakeholders
- Reviews Draft reports and provides input



EPA

- Provides technical assistance
- Works with TBA recipient on project scope, site access, etc.
- Works with DEQ to align assessment work with potential future DEQ guidance
- START contractor develops work plan based on background data
- START contractor conducts environmental site assessment (ESA)
- START contractor provides ESA report(s) and rough order magnitude remediation costing guidance



MT DEQ

- Participates on kickoff call to provide guidance regarding State requirements and objectives
- Determines Petroleum Brownfields eligibility
- Helps with site specific information that will aid project scoping
- Reviews Draft reports and provides State guidance



START CONTRACTOR

We Can

- Collect, assemble and interpret relevant site information
- Conduct on-site sampling and measurements
- Interpret and summarize environmental sampling data
- Provide rough order cost guidance for potential remedial approach(es)

We Cannot

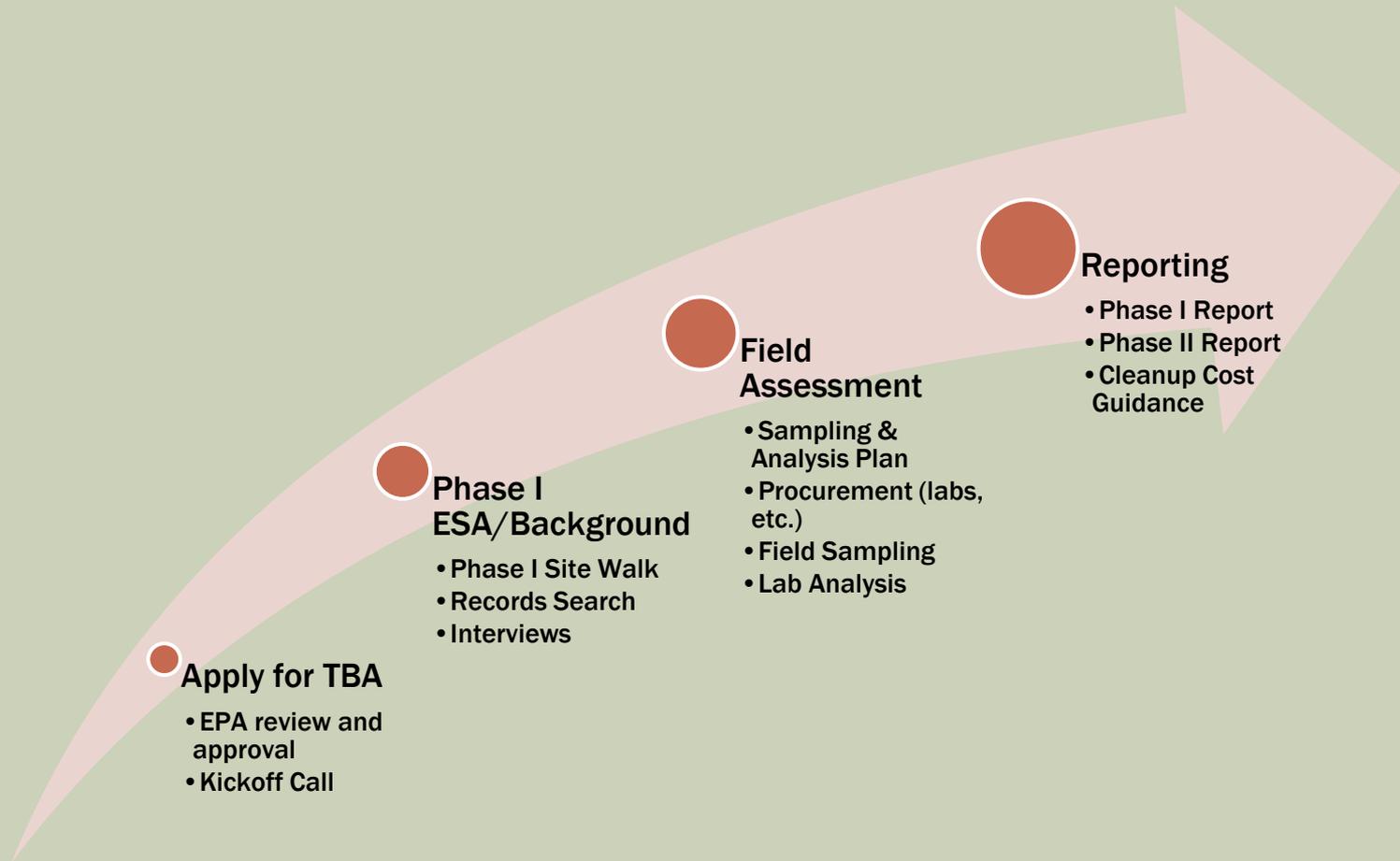
- Determine site eligibility for TBA program (EPA)
- Define the future use scenario (TBA Recipient & current/future owner)
- Determine final site remedial approach (TBA Recipient, DEQ, EPA, current/future owner)
- Change the scope of work (EPA in consultation with TBA Recipient)

HOW TO HELP US HELP YOU

- Provide background documents, history and access agreements
- Explain concerns
 - Sources of potential contamination
 - Potentially affected media (soil, building materials, etc)
 - Who might be exposed to contaminants
- Explain redevelopment goals
 - Type of use (residential, commercial)
 - Plans to refurbish or demolish buildings
 - Future building footprints
- Review draft plans and reports and provide feedback
- Be available on site
- Tell us when we get too technical!

THE TBA PROCESS

TBA PROCESS



SETTING EXPECTATIONS

- Starts with the TBA Application
- Kickoff call – may seem simple but gets us all on the same page
- Conduct interviews/talk to stakeholders
- Sampling & Analysis Plan – full of technical terms, but sets project objectives
- Walk the site!



DATA QUALITY OBJECTIVES - EXAMPLE

Goals (What we said)

- Assess and evaluate suspected contaminants that may be present at the Site.

Decision Statement (What that means)

- Is ACM material present in the building? If so, where is it located? What is the percentage concentration indicated by laboratory analysis?
- Is lead present in the surface soils surrounding the building at levels that will prevent redevelopment for residential/commercial? If so, where? What are the concentrations in soil?

SERVICES



- Environmental due diligence research
- On site sample collection
 - Hazardous building materials
 - Surface soil, subsurface soil, groundwater, surface water, air (including soil gas) sample collection for laboratory analysis
 - Field survey of metals in soil using XRF (x-ray fluorescence)
 - Drilling/soil borings
- Geographic information systems (GIS) spatial data mapping

TIMEFRAMES FOR TBA

Task	Timeframe
Project Kickoff Call	Project start
Phase I Site Visit	1 to 2 weeks from kickoff depending on site access and availability
Draft Phase I Report	2 weeks after site visit
Final Phase I Report	Either after receiving comments on Draft or submitted with Final Phase II Report
Draft Sampling & Analysis Plan	Week following Draft Phase I report
Final Sampling & Analysis Plan	2 to 4 days following receipt of comments on Draft

TIMEFRAMES FOR TBA (2)

Task	Timeframe
Conduct Field Sampling	Following approval of Final Sampling & Analysis Plan
Laboratory Analysis	2 weeks
Draft Phase II Report and Cleanup Estimate	2 weeks following receipt of laboratory data
Final Phase II Report and Cleanup Estimate	1 week following receipt of comments on Draft Estimate

DELIVERABLES

- **Common**
 - Phase I
 - Phase II
 - Cleanup cost guidance
- **Less Common**
 - Detailed analysis for use in ABCA (Analysis of Brownfields Cleanup Alternatives) also known as a Recommended Alternatives Analysis (RAA)
 - EE/CA (Engineering Evaluation/Cost Analysis)

EXAMPLES AND LESSONS LEARNED

FORMER AUTOSHOP

- **Redevelopment Goal**

- Food Bank Facility

- **Concerns**

- Soil impacts from vehicles and drums
- Hazardous building materials

- **Contaminants**

- ACM, LBP, Mercury, PCBs
- Metals, VOCs, SVOCs



FORMER AUTOSHOP LESSONS LEARNED



- Phase I site walk revealed presence of drums. Worked with TBA recipient to have current owner remove them.

FORMER SCHOOL GYMNASIUM

- **Redevelopment Goal**

- Refurbish for
Community Use

- **Concerns**

- Hazardous building materials
- Potential for soil impacts

- **Contaminants**

- ACM, LBP, Mercury, PCBs



FORMER SCHOOL GYMNASIUM – LESSONS LEARNED



- Focus soil cleanup to control costs
- Identified some soil impacts based on knowledge of building that was demolished in the past

UNUSED LOT

- **Redevelopment Goal**
 - Owner would like to sell
- **Concerns**
 - Historic data indicated past presence of underground storage tanks
- **Contaminants**
 - Potential for petroleum hydrocarbons



UNUSED LOT – LESSONS LEARNED



- Historic records revealed potential concern
- DEQ involvement reviewing Sampling & Analysis Plan and reporting key to facilitating future redevelopment

FORMER LANDFILL

- **Redevelopment Goal**
 - New residential area
- **Concerns**
 - Soil contaminants
 - Soil gas
- **Contaminants**
 - VOCs, SVOC, Metals



HISTORIC HOTEL

- **Redevelopment Goal**
 - Renovate and preserve historic building
- **Concerns**
 - Hazardous building materials
- **Contaminants**
 - ACM, LBP, Mercury, PCBs



HISTORIC HOTEL – LESSONS LEARNED



- Local redevelopment effort showed that building could be renovated in spite of building degradation and historically used hazardous building materials

Congrats on receiving 2015 Montana Historic Preservation Award!

FORMER DRY CLEANERS



- **Redevelopment Goal**
 - Fast food restaurant
- **Concerns**
 - Hazardous building materials
 - Past release of solvents to soil and groundwater
- **Contaminants**
 - ACM, LBP
 - PCE, TCE



FORMER DRY CLEANERS – LESSONS LEARNED

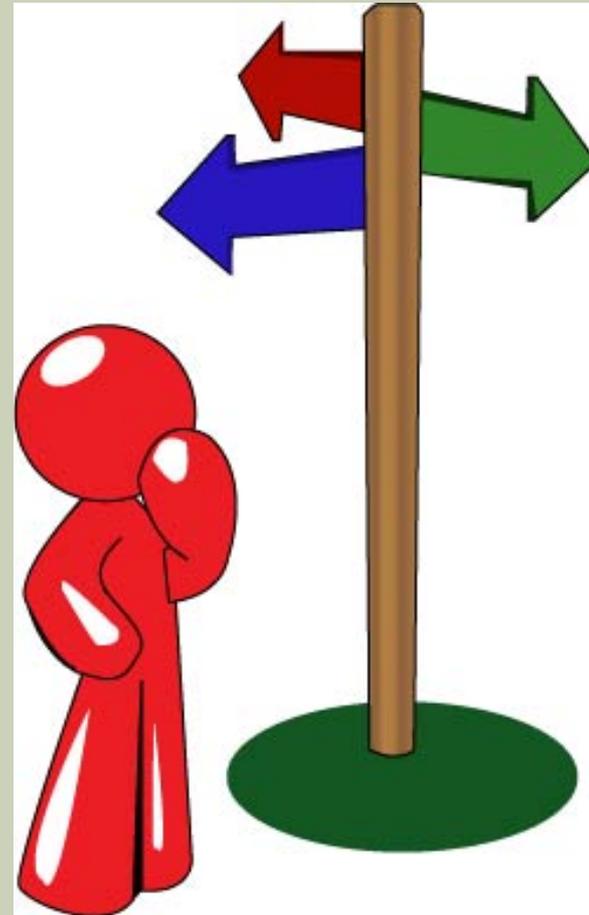


- Both City and State staff had been frustrated with lack of progress at site
- Developer wants property, but needs assurances from State
- Able to get site access via Developer
- TBA provides clear definition of problem for all parties

**WHAT CAN I DO WITH
TBA RESULTS?**

PLAN NEXT STEPS

- Plan cleanup work
- Use cost estimate as benchmark when reviewing contractor bids
- Use Phase II report to support application for cleanup grant
- Present results to community



BROWNFIELDS CLEANUP GRANT

- Site must meet definition of Brownfield
- Grant recipient must own the property
- Applicant must provide a Draft ABCA
- Must ensure compliance with public involvement requirements
- May be used to address petroleum and hazardous substances
 - Must demonstrate not liable for the contamination
 - For petroleum sites, must be of “relatively low risk,” no viable responsible party, and not be subject to a RCRA corrective action order





DISCUSSION