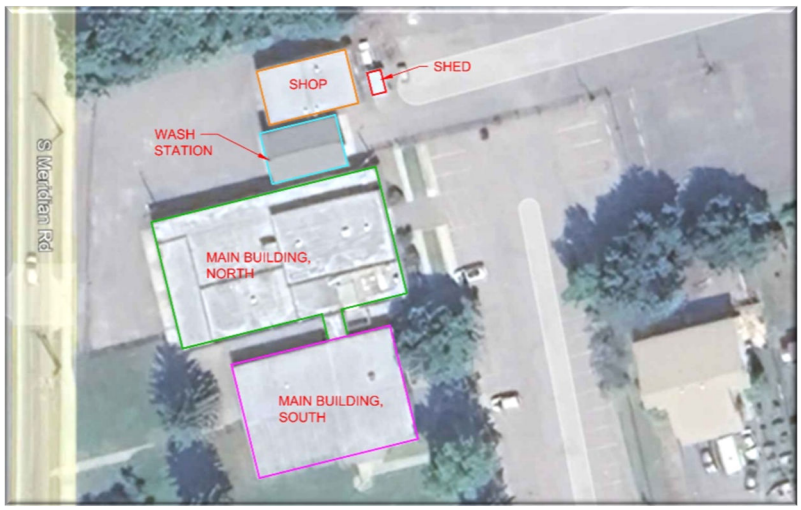
ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES – *FINAL*



SAMARITAN HOUSE – ABATEMENT
1110 2ND STREET WEST
KALISPELL, MONTANA 59901

Prepared For:

Montana Department of Environmental Quality

Waste Management & Remediation Division
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DEQ Contract 421011-TO2

AWS Project 20014.02

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TABLE OF CONTENTS

1.0 INTRODUCTION AND BACKGROUND

This Analysis of Brownfields Cleanup Alternatives (ABCA) has been prepared by Air Water Soil, LLC (AWS) for the Montana Department of Environmental Quality Waste Management and Remediation Division (DEQ), relating to their *Samaritan House – Abatement* project at the site (see Section 1.1 below). Preparation of the ABCA is included as a portion of AWS's scope of work as set forth in *Task Order 02* of AWS's term contract with DEQ (DEQ Contract 421011-TO2). The ABCA has been prepared as an appendix to AWS's *Post-Remediation Clearance Sampling and Analysis Plan* (Clearance SAP) for the site.

1.1 Site Location

The project site is located at 1110 2nd Street West in Kalispell, Montana 59901, as illustrated in Figure 1 (Appendix B). The site property is owned by:

Samaritan House Inc.
P.O. Box 592
Kalispell, Montana 59903-0592
406.257.5801

Primary structures at the site include the following:

- *Main Building, North and South*
- *Wash Station*
- *Shop*
- *Shed*

1.2 Previous Site Uses and Previous Cleanup/Remediation

The 2.4-acre Samaritan House property is currently used as administrative offices and storage for the Samaritan House, which is an organization providing homeless shelter and transitional living program services. The property was historically used as an armory by the United States Army Reserve. During this time, a portion of the *Main Building, North* was used as an interior rifle range.

A Phase II Environmental Site Assessment (ESA) was completed by WGM Group in December 2022, including limited evaluation of asbestos, lead-based paint within the *Main Building, North and South* and *Shop* buildings. The WGM Phase II ESA also included evaluation of lead in settled dust relating to the former rifle range in the *Main Building, North*. AWS completed a supplemental Phase II ESA at the site on behalf of DEQ, including identification of building materials containing asbestos, lead-based paint, mercury, and polychlorinated biphenyl (PCB). The collective WGM and AWS assessment findings were presented in AWS's *Phase II Environmental Site Assessment Report – Final*, dated September 23, 2024.

Contaminants of Potential Concern (COPC) identified for the site had not been remediated at the time of preparation of this ABCA document.

1.3 Site Assessment Findings

COPCs identified at the site include asbestos-containing materials (ACM), lead-based paint (LBP), lead-contaminated dust, presumed mercury-containing fluorescent light tubes and liquid metal thermostat ampoules, presumed PCB-containing fluorescent light ballasts, and Freon-containing appliances.

1.4 Project Goal

Samaritan House Inc. intends to redevelop the site as part of their *Samaritan House Administrative Center (SHAC)* project. The project is expected to include renovation of the existing *Main Building, North and South* and complete demolition of the *Wash Station*, *Shop*, and *Shed* structures. The redevelopment project will consider the aspect of *Trauma Informed Design* to address issues that emergency shelter clientele may have had to face in their past housing situations.

Based on information provided by Samaritan House, Inc., the long-term benefit to their clientele will be on-site administrative support service offices in the *Main Building, South*, separated by a larger foyer and long hallway, leading to an overnight emergency shelter area in the *Main Building, North*. The existing kitchen and gathering space will remain intact and will be used for the service of daily meals. Restrooms, laundry facilities, storage, lockers, and a lounge will be available for clientele in the shelter area, along with 3 oversight offices. The shelter is expected to operate only during severe weather events. The redevelopment project will also include a new, attached maintenance facility along the west side of the existing *Main Building*. Outdoor seating areas will be provided for clientele and administrative staff.

The intent of the planned remediation project is to address COPCs which are expected to be impacted by the project (the “target materials”) in order to limit the potential for public, worker, and/or environmental exposure to COPCs, where feasible. Note that Freon-containing appliances are expected to be reused or recycled and are therefore not included as COPC target materials for the purpose of the remediation project.

2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.1 Cleanup Oversight Responsibility

Remediation of COPCs at the site will be completed by AWS and overseen by the Montana DEQ Brownfields Program.

2.2 Regulations and Cleanup Standards

Remediation, transport, and disposal of COPCs will be completed in accordance with current, applicable federal and state regulations relating to asbestos, lead-based paint, mercy, and PCBs, as follows:

- Asbestos
    - Asbestos Hazard Emergency Response Act (AHERA). Title 40, Part 763 of the Code of Federal Regulations (40 CFR 763).

  - National Emission Standards for Hazardous Air Pollutants (NESHAP). 40 CFR 61, Subpart M.
  - Occupational Safety and Health Administration (OSHA) Asbestos Construction Standard. 29 CFR 1926.1101.
  - Montana Code Annotated, Title 75 – Environmental Protection, Chapter 2 – Air Quality, Part 5 – Asbestos Control (MCA 75.2.5).
  - Administrative Rules of Montana, Subchapter 17.74.3 – Asbestos Control (ARM 17.74.3).
- Lead-Based Paint
  - Requirements for Lead-Based Paint Activities in Target Housing and Child-Occupied Facilities. 40 CFR 745, Subpart L.
  - OSHA Lead Construction Standard. 29 CFR 1926.62.
- Mercury
  - OSHA Occupational Health and Environmental Controls – Gases, Vapors, Fumes, Dusts, and Mists. 29 CFR 1926.55.
  - Standards for Universal Waste Management. 40 CFR 273.4.
- PCBs
  - OSHA Instruction – Classification of PCB Standards. STD 01-04-002.
  - Disposal of PCB Bulk Product Waste. 40 CFR 761.62.

3.0 CLEANUP ALTERNATIVES

AWS evaluated cleanup alternatives as discussed below, following the general guidelines established by the Environmental Protection Agency (EPA) for Brownfields projects.

3.1 **Alternatives Considered**

To address contamination at the site, 3 different cleanup alternatives were considered, including:

- Alternative #1 – No Action
- Alternative #2 – Remediation of Select COPCs
- Alternative #3 – Remediation of All Identified COPCs

3.2 **Evaluation of Cleanup Alternatives**

The anticipated *Effectiveness* (including climate change considerations), *Implementability,* and *Cost* of each alternative were considered as part of this ABCA. Each of these parameters is discussed in the section below for the respective cleanup alternatives evaluated for this ABCA. Note that climate change considerations are not discussed below; the anticipated effects on climate change are generally equal for the 3 alternatives considered.

3.2.1 Alternative #1 – No Action

Alternative #1 is the “no action” alternative, meaning no remediation of COPCs would be completed.

Effectiveness: Samaritan House would not be able to proceed with planned renovation under the No Action alternative, due to regulatory limitations and likely COPC exposures to the public, workers, and the environment.

Implementability: The No Action alternative requires no effort or planning.

Cost: There is no direct cost for the No Action alternative.

3.2.2 Alternative #2 – Remediation of Select Accessible COPCs

Alternative #2 includes remediation of select accessible COPC target materials at the site, as needed to comply with regulatory requirements to facilitate planned site redevelopment activities. Although this alternative addresses exposures to COPCs which may result in an elevated health risk, it does not address all COPCs at the site. For example, LBP on structural steel within the *Main Building, South* is in good condition, is not accessible, and is not expected to be impacted by the planned renovation work, so this LBP coating would be left in place with no action.

Effectiveness: Alternative #2 would facilitate regulatory compliance and protection from COPC exposure for the public, workers, and the environment. Note that not all COPCs would be remediated under Alternative #2. Future construction activities may require additional remediation.

Implementability: Implementation of Alternative #2 would require additional time to implement, and the site buildings would be inaccessible to Samaritan House personnel during remediation activities. Functionality of the remediated areas may be limited following remediation, prior to renovation. Coordination with Samaritan House and their project architect and contractor would be required.

Cost: Estimated remediation costs for Alternative #2 are approximately $134,000 (excluding costs of oversight and post-remediation monitoring), as detailed in the September 2024 AWS Phase II ESA report.

3.2.3 Alternative #3 – Remediation of All Identified COPCs

Alternative #3 includes remediation of all COPCs identified at the site, as documented in the September 2024 AWS Phase II ESA report.

Effectiveness: Alternative #3 is generally impractical, since it would require substantial additional construction effort. For example, interior building materials and nearly all finishes within the *Main Building, South* would need to be removed to expose LBP coatings on structural steel to facilitate removal or encapsulation of these materials.

Implementability: Implementation of Alternative #3 is infeasible, since it would require additional time, effort, and remediation costs (as well as additional build-back cost).

Cost: The cost to implement Alternative #3 was not estimated, although it would be substantially higher than the cost for Alternatives #1 or #2. Additional effort and cost would

be incurred to expose all COPCs for remediation, complete the additional remediation, and then replace the remediated materials (and the building finishes removed to access them).

3.3 **Recommended Cleanup Alternative**

Following review of the alternatives listed above, and considering Samaritan House's *SHAC* site redevelopment project objectives, AWS recommends Alternative #2 – Remediation of Select COPCs. Implementation of Alternative #2 will facilitate regulatory compliance and protection of the public, workers, and the environment from exposure to COPCs.

Alternative #1 is much cheaper, but it will not facilitate regulatory compliance or provide COPC exposure protection. Alternative #3 would provide regulatory compliance and COPC exposure protection, but it would be prohibitively expensive.