



NARRATIVE INFORMATION SHEET

1. Applicant Identification:

City of Monroe, Louisiana
PO Box 123
Monroe, LA 71210-0123

2. Funding Requested:

Grant Type: Single Site Cleanup
Federal Funds Requested: \$872,900

3. Location:

Monroe, LA
Ouachita Parish
Louisiana

4. Property Information:

Ouachita Candy Company
211 -305 Walnut St.
Monroe, LA, 71201

5. Contacts:

Project Director
Kelsea McCrary
318-329-2250
Kelsea.Mccrary@ci.monroe.la.us
Monroe City Hall
400 Lea Joyner Expressway
P.O. Box 123
Monroe, LA 71210-0123

Chief Executive/Highest Ranking Elected Official
Friday Ellis
318.329.2280
Friday.ellis@ci.monroe.la.us
Monroe City Hall
400 Lea Joyner Expressway
P.O. Box 123

6. **Population:**
47,702

7. **Other Factors**

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Community population is 10,000 or less.	
The application is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site is adjacent to a body of water (i.e., the border of the proposed site is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1,2
The proposed site is in a federally designated flood plain.	3
The reuse of the proposed cleanup site will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site will incorporate energy efficiency measures.	
The reuse strategy or project reuse of the proposed site considers climate adaptation and/or mitigation measures.	
The target area is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	

8. **Releasing Copies of Applications:**
N/A

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. **Overview of Brownfield Challenges and Description of Target Area:** Located in northeast Louisiana between Shreveport, LA and Jackson, MS, the City of Monroe, LA (population 47,702¹) is a small, rural, riverfront community, bordered on the west by the Ouachita River. Directly across the river is the City of West Monroe, which while not part of our municipality, is indelibly connected to our economy and culture, and collectively we are called the Twin Cities. The Ouachita River is central to the history and growth of our City, and it is our greatest, yet most underutilized asset. Monroe's economy was founded on the riverfront as a steamboat-era trade route and Delta Southern Railroad connection. Timber, cotton, soy, rice, and sweet potatoes formed our early trade culture. In the early 1900s, commercial and industrial development along the downtown Monroe riverfront matured when Joseph A. Biedenharn opened his Coca-Cola bottling and candy production company on Walnut Street near the Endom Bridge, which became the epicenter of the downtown Monroe riverfront. Biedenharn was the first person to bottle Coke, which up until then was only available when individually mixed at a soda fountain. A few years later, natural gas was discovered in Monroe, which quickly multiplied the local economy and attracted the manufacturing industry. As manufacturing grew, support service businesses flocked downtown including banking, retail, health care, and government institutions. Between 1920 and 1930, the population of Monroe doubled, enabling businesses around the downtown riverfront to grow and thrive. Our downtown riverfront brownfields problems began in 1935 when the highway system shifted the major commercial structure of the City to the north. Around this same time, the University of Louisiana Monroe (ULM)² was established to the northeast, pulling development in that direction. With suburbanization and the coming of Interstate 20 south of downtown in later years, the City was further expanded and the downtown Monroe riverfront was left with gaps in the street façade and abandoned buildings with both industrial and commercial use histories. Today, many downtown storefronts are vacant, boarded up, and dilapidated, and the pedestrian/visitor experience is uninviting due to blocked views of the river, breaks in continuity, and a perception of being unsafe due to inactivity. As a result, the **local economy suffers from disinvestment, a low tax base, depressed property values, limited small business and jobs creation, sluggish tourism income, and environmental justice problems.**

The target area for this project is the *Downtown Redevelopment Core*, comprising approximately 12 City blocks along the Ouachita River centered around the former Ouachita Candy Company. It is irregularly shaped, bordered roughly by the Ouachita River to the west, Olive St. to the north, N 2nd St. to the east, and Desiard St. to the south, but it also includes the riverfront west of S. Grand Street toward I-20 and riverfront nature trails toward Louisville Ave. It is directly adjacent to some of the poorest and most underserved neighborhoods in the City, with a **68% minority population and a per capita income of only \$14,841**. Historic flooding downtown in the 1920s and 30s led to the construction of a system of floodwalls and levees along the downtown Ouachita riverfront built in 1934 by the Army Corps of Engineers. While the flood structures protect the City, they also limit public access to the river, which constrains the potential for economic growth along the riverfront. Physical and visual access to the riverfront can foster a sense of place, appreciation for nature and the City, and unify us with our Twin City across the river. While other cities have harnessed the power of their riverfront asset and created strong economies through tourism, recreation, and business creation, we have overlooked our riverfront too long. Yet, there are plenty of signs that now is the time to correct this by investing in and along this asset. Commercial and housing developers are investing in projects around the downtown riverfront, including a \$31.3 million hotel in the target area, and a \$19.1 million affordable housing project that connects the target area to nearby historically black neighborhoods. Also, through public surveys conducted in 2021, the community identified riverfront connectivity as a top priority for future projects. Redeveloping the Ouachita Candy Company into a mixed-use commercial property would be a high-profile catalyst project to **attract further investments and redevelopment projects, improve economic conditions in the underserved target area, allow affordable opportunities for new and emerging businesses to thrive in the downtown market, and reconnect our community to its greatest cultural and natural asset, our beloved Ouachita River.**

ii. **Description of the Proposed Brownfields Site:** In 2019, the City of Monroe, along with Coalition Partners, the City of West Monroe and Ouachita Parish Police Jury, were awarded a \$479,000 Community-Wide Assessment (CWA) Grant from the U.S. Environmental Protection Agency (EPA). During that project, Monroe prioritized six brownfield sites for catalytic and complementary development. The highest priority site is the former ***Ouachita Candy Company property (Ouachita Candy)***, which is the proposed brownfield site for this cleanup grant. *Ouachita Candy*, located at 211 -305 Walnut St., is 3.7 acres, and comprises three

¹ 2020: ACS 5-year Estimates, US Census Bureau. data.census.gov.

² The education industry remains one of Monroe's most important economic sectors today.

contiguous, dilapidated, vacant buildings about 112,000 sq. ft. total, and right-of-way (ROW) access for a railroad spur adjoining the Ouachita River. The buildings were constructed in the early 1920s, and have brick exteriors, broken windows destroyed by decades of hurricane/weather damage and neglect, and crumbling interiors. Building 1 is single story, and buildings 2 and 3 are two story. The second stories have no structural integrity that will allow safe entry or passage. For this project, the three contiguous buildings will be treated as one main building. The property was added to the National Register of Historic Places in 2013. Adjoining the property to the north is the Northeast Louisiana Children’s Museum, which attracts hundreds of visitors weekly, primarily families with young children. Across the street to the east is a row of historical properties that include redeveloped retail and medical spaces, and three vacant buildings. Two of the three vacant buildings are being redeveloped into apartment housing. To the south is a restaurant, and the Ouachita River is to the west. It is part of a long string of discontinuous building use/vacancies along the downtown riverfront. The result is an atmosphere of decline, crime vulnerability, environmental concern, and unattractiveness that negatively impacts the economy in this underserved community. The property is also vulnerable to trespassing, which is especially dangerous with a young children’s facility next door. After all appropriate inquiry, the City purchased the property in 2021 to begin cleanup and redevelopment. Ouachita Candy is a primary catalyst for revitalizing the target area and the areas beyond because it is located at the crossroads of three strategic City planning corridors. The first corridor connects downtown to businesses, museums, and community assets at Forsythe Park to the north. The second is the university corridor that connects the ULM campus to the downtown area. It also provides greater connectivity for disadvantaged neighborhoods sandwiched between Ouachita Candy and ULM. The third connects the RiverMarket and Marina recreational and tourism assets to downtown businesses. Connecting the three corridors will unite key economic drivers within the City.

Monroe used part of its 2019 CWA grant to complete a Phase I Environmental Site Assessment (ESA), Phase II ESA (including Asbestos-Containing Materials & Lead-Based Paint Survey), updated Phase I ESA, Analysis of Brownfields Cleanup Alternative (ABCA), Risk Evaluation/Corrective Action Report (RECAP), and a Brownfield Cleanup Plan (CAP). The ESAs identified a variety of historical uses for various portions of the property dating back to the 1880s, including as a Masonic Temple, a wood working facility, a residential site, a candy company and soft drink bottling company with a conveyor-belt system, an automotive repair facility with filling station that included vehicle washing and greasing operations, a vehicle maintenance area, a storage warehouse, and personal storage. Currently, the property is vacant and unused. Historical uses and site inspection led to soil and groundwater sampling and analysis that found minimal impact and resulted in LDEQ issuing a No Further Interest (NFI) Letter on the identified contaminants of concern (COC). The ESAs also identified asbestos-containing material (ACM) at the target site that will need to be cleaned up prior to redevelopment efforts. ACM is limited to interior building materials in the main building. The ACM is non-friable, which means it does not pose an immediate threat to the surrounding environment or public. However, asbestos abatement will be necessary before renovation can occur because demolition activities can cause non-friable ACM to become friable. Should ACM become friable, risk pathways would include ingestion, and inhalation of potentially hazardous materials and substances by site visitors and/or trespassers. However, the greatest threat would be to construction workers during renovation and abatement activities, which potentially pose an exposure risk through inhalation, ingestion and contact. ACM can cause asbestosis and/or cancer. Also identified on site during the ESAs were about 15 containers and drums labeled as a variety of hazardous materials, including refrigeration and hydraulic oil, lubricant, engine cleaner, and paints. These hazardous materials will need to be safely removed and disposed of prior to redevelopment.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: The City will reuse Ouachita Candy as a mixed-use facility. The spaces will be used for retail, food service, and/or other mixed use. As the owner of the property, Monroe will enter into a public-private partnership with the developer, who will redevelop Ouachita Candy into the mixed-use spaces. Ouachita Candy is one of the last developable properties available along the Ouachita River in downtown Monroe. Because of its location, history, and cultural value, local newspaper the *News Star* labeled Ouachita Candy “the centerpiece to the revitalization of the downtown area and the City’s master plan.”³ The reuse strategy for Ouachita Candy aligns with and advances the local government’s Master Plan, Ouachita Parish Brownfields Revitalization Plan, Comprehensive Plan, land use planning, and the community’s priorities. The table below describes how the Brownfields Program reuse strategy for Ouachita Candy aligns with revitalization plans.

REVITALIZATION PLAN GOALS	HOW THE REUSE STRATEGY ALIGNS WITH REVITALIZATION
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³ Robinson, Ian. “Historic Ouachita Candy building is key piece of downtown Monroe’s history, future,” *News Star*. June 3, 2022.

PLANS	
MONROE MASTER PLAN	
Improve pedestrian/visitor experience along the downtown riverfront	Eliminating a large vacant property through reuse and being a catalyst for additional redevelopment nearby thus helping to create a contiguous pedestrian/visitor experience.
OUACHITA PARISH BROWNFIELDS REVITALIZATION PLAN	
Address retail leakage ⁴ in health and personal care stores, miscellaneous store retailers, clothing stores, and restaurants	Redeveloping Ouachita Candy as a mixed-use property would allow any of these types of retailers to come into the space.
COMPREHENSIVE PLAN	
Discourage the proliferation of urban sprawl	Ouachita Candy is located at the epicenter of the downtown Monroe riverfront. Redevelopment will reuse a vacant urban storefront and bring businesses, visitors and tourists into the urban core.
LAND USE PLANNING	
Acceptable use as a retail goods establishment, and or restaurant/reception facility (among others)	Reuse as a mixed-use facility including retail, restaurant and/or reception space meets land use planning goals.
COMMUNITY PRIORITY	
Better/more diverse job opportunities downtown	Reuse as a mixed-use facility will bring new jobs downtown. By being a catalyst for additional redevelopment nearby, will encourage even more businesses opening downtown.
Less vacant buildings to feel safe downtown	Reuse a large vacant building at the epicenter of the downtown riverfront.
More retail, restaurants, and family-friendly things to do downtown	Reuse as a mixed-use facility brings all of these assets downtown.
Mitigate inactivity downtown to encourage the opening of new businesses	Reuse as a mixed-use facility brings affordable opportunities for new and emerging businesses to thrive in the downtown market.

The property’s ROW access is located in a federally designated flood plain, as identified in our Brownfields Program reuse strategy. We will communicate our proposed redevelopment to the Tensas Basin Levee District Tensas Basin Levee who maintains the flood control facilities along the Ouachita River, and work with them on flood control strategies for the site. The public (including underserved communities) and project partners were involved in the development of the reuse strategy through a series of activities that helped to identify and prioritize the site, and determine its reuse as a mixed-use facility. Input was gathered at public meetings with the Historic Preservation Commission at Monroe City Hall, and with the Louisiana Department of Environmental Quality (LDEQ) who supported us by presenting to the community and answering questions about site reuse, public-private partnerships, environmental considerations, and funding opportunities. We also conducted a focus group meeting with the Downtown Economic Development District Committee to communicate project plans and learn more about how they align with past and current initiatives in downtown Monroe.

ii. **Outcomes and Benefits of Reuse Strategy:** The cleanup project will stimulate economic development in the target area in various ways and directly benefit this small, rural, underserved community. The anticipated economic benefits of the project include: creating up to 12 new commercial spaces to bring new businesses to the area; creating up to 45 new jobs in a high poverty area; producing an estimated \$500,000 per year in sales tax; generating between \$100,000 to \$300,000 in land lease fees through a public-private partnership; and increasing property values in the area. The noneconomic benefits of the revitalization plans include: making 3.7 acres available for reuse; reducing the threat of environmental hazards; and improving health outcomes in an environmental justice community. Monroe will provide guidance to developers on the use of renewable energies, and energy efficient building practices and technologies. Because *Ouachita Candy* is currently unused, the City does not expect the proposed project to cause the displacement of residents and/or businesses.

c. Strategy for Leveraging Resources

i. **Resources Needed for Site Characterization:** Monroe completed extensive site characterizations at Ouachita Candy with its 2019 CWA grant funding including a Phase I ESA, a Phase II ESA, and an updated Phase I ESA. In the event characterization is needed outside the scope of the current project plans outlined in section

⁴ Money being spent outside the community because of consumer preference or lack of available local options.

3.a. in order for the cleanup to begin, Monroe will seek assistance from LDEQ’s Targeted Brownfield Assessment (TBA) Program who provides funding for assessment activities on brownfield site.

ii. **Resources Needed for Site Remediation:** We anticipate that the funding requested in this application will be sufficient to complete the remediation of the proposed brownfield site. Site remediation estimates were prepared with inputs from a local Environmental Professional (EP) with extensive brownfields cleanup experience, and presented in the draft ABCA.

iii. **Resources Needed for Site Reuse:** To complete the site reuse, Monroe is seeking a private developer to enter into a public-private partnership. The developer will take the responsibility and risk for developing the property and pay a land use or lease fee to the City. Ouachita Candy is located within three important, overlapping, historical and cultural boundaries: the Downtown Monroe Historical District (a national register historic district), a Louisiana State Historic District, and the Riverside Cultural District. These designations make the developer eligible for historic tax credits up to 40% on renovation projects. The property is also eligible for New Market Tax Credits, Tax Increment Financing, the Restoration Tax Abatement (RTA) program, and a \$17 billion federal and State Renewal Community tax credits program. We fully expect such incentives to draw significant developer interest in the site.

iv. **Use of Existing Infrastructure:** Existing roadways, communications/broadband, water, and sewer infrastructure at Ouachita Candy will be sufficient for use by new businesses occupying the site following completion of the redevelopment project. Levee wall and other flood mitigating infrastructure, currently operated and maintained by the Tensas Basin Levee District, are also projected to be sufficient. If additional infrastructure needs or upgrades are key to the revitalization plans for the PBS, the City will invest funds, and will be eligible for up to \$700,000 through a Louisiana Division of Administration, Office of Community Development Block Grant to address the needs. All infrastructure improvements will trigger compliance with Build America, Buy America (BABA) Provisions under 2 CFR 200.322.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. **The Community’s Need for Funding:** Monroe is a small, rural community with a population of 47,702. Our population size has declined 10.7% since 2000⁵ , primarily due to a lack of high-paying jobs. COVID-19

	Monroe	Shreveport	Louisiana	US
Families Below Poverty Level	30.4%	19.5%	14.2%	9.1%
Per Capita Income	\$31,926	\$27,914	\$50,800	\$64,994
Unemployment Rate	7.9%	7.1%	6.6%	5.4%

Source: 2020: ACS 5-year Estimates, US Census Bureau. data.census.gov.

amplified our problems with 428 layoffs in Ouachita Parish⁶ since 2020, and statewide employment down 144,000 jobs from pre-pandemic levels.⁷ Monroe’s unemployment rate is 7.9%, higher than the nearby City of Shreveport, LA, State, and national

rates. As a result of our job loss and population decline, our economy has also suffered. About 1 in 3 families in Monroe are below the poverty level, which is higher than Shreveport, more than double the state rate, and more than triple the US rate. Furthermore, Ouachita Parish is a **persistent poverty county** (poverty rates of 20% or greater for at least 30 years), with poverty rates of 24.7% in 1990,⁸ 20.7 % in 2000,⁹ 26.7% in 2010, and 33.7% in 2020.¹⁰ Furthermore our per capita income is about a third less than the state average, and less than half the national average. A **declining economy, job loss, persistent poverty, and the low per capita income of our community** have all translated into problems for our local economy, which suffers from a **low tax base, depressed property values, limited small business and jobs creation, and sluggish tourism income.** All of these factors are why Monroe has an inability to fund environmental cleanup at *Ouachita Candy*. However, redeveloping the site as a mixed-use facility will **create jobs, improve the tax base, increase property values, spur small business and jobs creation in surrounding properties, and improve riverfront tourism.**

ii. **Threats to Sensitive Populations**

(1) **Health or Welfare of Sensitive Populations:** It should be noted that while children are not largely residents of the target area surrounding *Ouachita Candy*, the neighboring property is a Children’s Museum that draws hundreds of visitors weekly including young children and pregnant women. It would be assumed

⁵ 2020: ACS 5-year Estimates, US Census Bureau. data.census.gov.

⁶ 2020, 2021, 2022 WARN Lists, Louisiana Workforce Commission. laworks.net.

⁷ 2021 Louisiana Economic Abstract, Center for Economic Research. business.latech.edu

⁸ 1990 Census of Population Social and Economic Characteristics Louisiana Section 1 of 2. US Department of Commerce, Economics, and Statistics Administration, Bureau of the Census. P 9.

⁹ 2000: ACS 5-year Estimates, US Census Bureau. County: Ouachita Parish. data.census.gov.

¹⁰ 2010, 2020: Small Area Income and Poverty Estimates (SAIPE), US Census Bureau. County: Ouachita Parish. census.gov.

that visitors to the museum would also be visitors of retail, food service, and other businesses brought in by reusing *Ouachita Candy* as a mixed-use facility next door, and could risk exposure. Our sensitive populations face significant health and welfare challenges such as **poverty, crime, lack of jobs, and environmental impacts**. We are a low-income, persistent poverty community. The crime rate per 100,000 residents for Monroe (813) is significantly higher than the rates for Shreveport (563) and New Orleans (552).¹¹ The *Ouachita Candy* reuse strategy will help to address many of these health and welfare challenges for our sensitive communities by creating jobs and new small business opportunities that will help to **improve poverty levels, reduce the number of derelict properties that perpetuate crime, and eliminate environmental concerns that contribute to poor health outcomes in a underserved community**.

	Target Area*	Monroe	Louisiana	US
% Children	18%	27%	24%	22%
% Women	56%	52%	51%	51%
% Minority	68%	66%	41%	40%
Per Capita Income	\$14,841	\$31,926	\$50,800	\$64,994

Source (unless otherwise indicated): 2020: ACS 5-year Estimates, US Census Bureau. data.census.gov. Priority Area comprises census tract 108.
*Source: EJSscreen ACS Summary Report. US EPA. Defined as custom polygonal shape - Downtown Redevelopment Core Priority Area.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Monroe struggles with numerous adverse diseases and health conditions that may be related to exposure to hazardous substances

	Monroe	Ouachita County	Louisiana	US
Cancer ¹	504.9	505.6	482.4	448.6
Lung Cancer ¹	72.3	71.9	64.6	57.3
Asthma Prevalence ²	11.4%	10.1%	9.5%	8.9%
Birth Defects ³	-	-	2.95%	3%
Heart Disease Hospitalizations ⁴	16.9	16.9	13.8	11.8

¹ Rates per 100,000 population. Source: 2018 State Cancer Profiles. Accessed via CARES Information Network.
² Percentages of adults 18+. Source: CDC, 2019 Behavioral Risk Factor Surveillance System. Accessed via CARES Information Network.
³ Source: Louisiana Birth Defects Monitoring Network 2021 Annual Legislative Report. LA Department of Health. Nov 2021.
⁴ Rate per 1,000 Medicare beneficiaries. Source: CDC – 2018 Atlas of Heart Disease and Stroke. Accessed via CARES Information Network.

like those identified at *Ouachita Candy*. ACM is a concern because asbestos minerals tend to separate into microscopic size particles that can remain in the air and be inhaled, leading to life-threatening diseases, including asbestosis and lung cancer. **Cancer, lung cancer, and asthma** are all breathing conditions that can be caused by or exacerbated by ACM and all can be found at higher rates in Monroe than in the State and the nation. Birth defects data was limited at the City or County level, and the state levels are comparable to national levels, but it should be noted

that coronary heart defects (CHD) are the leading cause of birth defects in Louisiana, and the hazardous materials (oils, cleaners) to be cleaned up in this project are known **contributors to CHD and heart disease**, which is also found at a higher rate in Monroe than in the State and nation. The *Ouachita Candy* reuse strategy will include cleanup of ACM and hazardous materials that are known contributors to all of these diseases and conditions, and will help to reduce their incidences in our community.

(3) Promoting Environmental Justice: Environmental justice issues disproportionately effect underserved communities in the *Downtown Development Corridor* target area. Brownfields with industrial and commercial use histories have sat abandoned for decades, with environmental contaminants that have long been forgotten or worse, avoided. It has created economic hardships that further devalue the priority area and create a loop of disinvestment, and Justice 40 issues. EJ Issues where the Downtown Development Corridor priority area exceed 90th percentile in the nation include Air Toxics Cancer Risk, Air Toxics Respiratory HI, Lead Paint, Hazardous Waste Proximity, Underground Storage Tanks, and Wastewater Discharge. This grant and

Environmental Justice Issues- Target Area		
	Percentile in State	Percentile in USA
EJ Index for Air Toxics Cancer Risk	92	97
EJ Index for Air Toxics Respiratory HI	92	97
EJ Index for Lead Paint	94	92
EJ Index for Hazardous Waste Proximity	87	90
EJ Index for Underground Storage Tank	95	95
EJ Index for Wastewater Discharge	95	97

Source: EJSscreen Report. USEPA. Source geography: custom shape, Downtown Development Corridor. ejscreen.epa.gov.

¹¹ 2019 Crime Rates, Table 6., FBI Uniform Crime Rates. ucr.fbi.gov.

reuse strategy will promote environmental justice among the underserved population in the priority area by **cleaning up long standing environmental conditions that contribute to air toxics and hazardous wastes in the community**. It will also begin a trend of investment in the community through **building reuse, tax-base increases, jobs creation, beautification, and pride** in an area that has been underserved for too long.

b. Community Engagement

i. Project Involvement, ii. Project Roles

List of Organizations/Entities/Groups & Roles

Organization/ entity/group	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
Black Creatives Circle	Evan Davenport, davenport.erin.a@gmail.com, 318-557-9976	Neighboring arts community. Connect community and sensitive populations to the project.
Louisiana Delta Community College	Dr. Wendi Tostenson, wenditostenson@ladelta.edu, 318-345-9192	Work within community to find redevelopment/workforce resources.
University of Louisiana Monroe	Jamie Hanks, hanks@ulm.edu, 318-342-1150	Work within community to find redevelopment/workforce resources.
Downtown Economic Development District Committee	Larry Bratton, Chairman Lb0223@att.com 318-329-4947	Bring resources and workforce to the project.
Downtown Monroe Main Street	Nirali Patel, Nirali.patel@ci.monroe.la.us, 318-329-2200	Facilitate public communication and community outreach.
Louisiana Brownfields Association	Maggie Trenary-Gleason, execdirectorlba@gmail.com, 223-389-3144	Brownfields education. LDEQ negotiation. Resource sharing.
Monroe Chamber of Commerce	Roy Heatherly, rheatherly@monroe.org, 318-323-3461	Neighboring property. Focus on neighborhood needs. Mobilize local businesses and community to support redevelopment.
Louisiana Trust for Historic Preservation	Brian M. Davis, bdavis@lthp.org, 318-267-5220	Guide historic/cultural preservation.
Northeast Louisiana Children’s Museum	Melissa Saye, Nelcm1@gmail.com, 318-361-9611	Neighboring property. Focus on neighborhood needs, especially among sensitive populations.

iii. Incorporating Community Input: Collecting and incorporating community input has been the driving force to the City’s Brownfields Program since its inception in 2019. For our 2019 CWA grant, we developed successful and proven methods for incorporating community input. To communicate project progress to the local community, project partners, groups involved in the project, and residents/groups impacted by the site, Monroe will hold three public community meetings (with more as needed), have regular meetings with project partners and the already-established Brownfields Action Committee (BAC), and use a Brownfields website to share detailed information about the project. The BAC comprises representatives from local real estate, social services, City Council, City inspector and planning departments, Parish Policy Jury, local business owners, and environmental professionals. Input was solicited from the community through the public meetings led by the City’s Brownfields team, City Council leaders, and the Historic Preservation Committee. Similar meetings will be held for this cleanup project. The City has already held its first public meeting on October 28, 2022 to solicit comments on this cleanup grant application. It was an in-person meeting held at City Hall. The meeting was published via the City’s website, made accessible by using an ADA-compliant facility, a Section 508-compliant website to advertise the meeting, and offering translation services as needed. Other ways we will solicit community input is through on-site art installations with QR codes to online resources, social media, word of mouth through project partners and at local events, and online surveys. All community inputs will be reviewed within three business days by the brownfields project manager, evaluated, and forwarded to appropriate partners for action as needed. In the event the community inputs need a response, the project manager will track the communications to ensure a reply is delivered within a reasonable amount of time.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: A Brownfield Cleanup Plan (CAP) was completed on September 30, 2022 under the 2019 CWA grant, and was based on an evaluation of the cleanup alternatives that were presented in the

Ouachita Candy ABCA that was completed on January 6, 2022 (also funded by the 2019 CWA grant). The goals of the project are to protect human health and the environment and to redevelop an underutilized property for mixed-use development including, but not limited to, retail, food service, and/or other mixed use. The site is not suitable for such redevelopment and reuse without the removal of asbestos containing material (ACM) and containers of hazardous materials. Therefore, the proposed cleanup plan is to remove the ACM and containers that pose exposure risk to building renovators and future users of the development. Site conditions are well known from previous studies, the ABCA/CAP, and preliminary on-site meetings with an asbestos abatement contractor. Details on the proposed cleanup plan are presented below.

- **ACM Abatement:** Documented ACM quantities were identified as 7,200 square feet (sf) of red floor tile and mastic; 9,000 sf of brown floor tile and mastic; 1,000 sf of green sheet flooring and mastic; 10,000 sf of adhesive; 800 linear feet (lf) of white HVAC insulation; 12,000 sf of cream texture; 12,000 sf green floor tile and mastic; 12,000 sf dark brown floor tile; 12,000 sf brown mastic; and 26,000 sf HVAC insulation. The abatement portion where no selective demolition is necessary is anticipated to take 30 days.

- **ACM-Selective Demolition:** The ESAs, asbestos inspections, ABCA, and CAP all noted concerns over the structural integrity of the second floor of the main building and concerns for worker safety, particularly during the asbestos abatement process, and recommended that an **Engineering Analysis** that supports a decision to conduct selective demolition be completed prior to accepting bids for asbestos abatement. In this case, the second floor of the building is structurally unsound and abatement in these areas pose an unreasonable health and safety threat to any asbestos abatement workers. Selective demolition in these areas will result in an increase in the amount of materials and debris that would require special handling and disposal as material contaminated by ACM, but will be off-set by providing a measure of safety for workers involved in the abatement and demolition process. Selective demolition with abatement is anticipated to take 60 days. NOTE: Based on information obtained from asbestos professional who performed surveys, we expect that selective demolition will be necessary; however, an Engineering Analysis will be performed to confirm this assumption.

- **Container Removal/Disposal:** The following hazardous material and petroleum containers that pose a potential threat of release to the environment were found during site assessments: refrigeration oil, chain lubricant, unlabeled 5-gallon bucket, engine clean, unlabeled 35-gallon drum, hydraulic oil, lubricating compound, paint/primer, paint, and miscellaneous products.

- **Cleanup Planning and Air Monitoring:** In addition to asbestos abatement and disposal costs, asbestos abatement plans and specifications as well as bid documents must be prepared. These tasks will include preparation of an Engineering Analysis for selective demolition for abatement, remedial Quality Assurance Project Plan (QAPP) development, plans and specifications, along with bid documents. Air monitoring must also be performed in order to ensure workers and the public are safe, and not inhaling asbestos fibers. NOTE: The asbestos air monitor will be an independent party from the ACM Abatement Contractor which will be selected through a fair, competitive bidding process, consistent with EPA and federal requirements by the City.

The LDEQ has also concurred that adequate sampling has been conducted for cleanup to begin (see attached letter).

b. Description of Tasks/Activities and Outputs: The cleanup grant guidelines for this section request that (i) Project Implementation; (ii) Anticipated Project Schedule (iii), Task Activity/Lead, and (iv) Outputs be addressed. Due to the close relation between these items and for ease of presentation, we have addressed these criteria in a single table, provided below. This table provides a detailed listing of the major tasks to be completed, the activities/subtasks associated with each task, the schedule for completion, who will lead task efforts, and the anticipated outputs. Projected costs for each of the major subtasks/outputs are included in *Section 3.C, Cost Estimates*.

I. PROJECT IMPLEMENTATION	II. PROJECT SCHEDULE	III. TASK ACTIVITY/LEAD	IV. OUTPUTS
TASK 1. PROJECT MANAGEMENT/ADMINISTRATIVE			
Accept Cooperative Agreement, submit work plan	30 days after award	Applicant	Executed Cooperative Agreement; grant management oversight; EP contract documents; EPA kickoff meeting; 12 quarterly/annual reports in ACRES database; closeout documents
Grant Management	Continuous	Applicant	
Select/Finalize Contract with EP	60 days after award	Applicant	
Prepare EPA Progress Reports	Quarterly	Applicant & EP	
Travel to Brownfield Conference	Year 1	Applicant	
Kickoff Meeting with EPA and BAC	60 days after award	Applicant	
Final Closeout	30 days after grant closeout	Applicant & EP	

I. PROJECT IMPLEMENTATION	II. PROJECT SCHEDULE	III. TASK ACTIVITY/LEAD	IV. OUTPUTS
TASK 2. COMMUNITY INVOLVEMENT			
Prepare a Community Involvement Plan (CIP)	30 days after award	Applicant & EP	CIP; 3 community meetings
Community Meetings	Quarters (Q) 1, 4, and 5	Applicant & EP	
TASK 3. CLEANUP PLANNING			
Engineering Analysis for Selective Demolition and safety evaluation	Q1	EP	Engineering Analysis; SSQAPP; Final ABCA; Final CAP; Waste Container Characterization and bid specifications; ACM abatement plans and specifications, and bid documents; RFP for asbestos air monitor; selection asbestos abatement / selective demolition Contractor(s)
Site-Specific QAPP	Q1	EP	
Final ABCA and final Cleanup Plan	Q1	EP	
Prepare Bid Documents for Drum Disposal	Q2	EP	
Container Disposal Contractor Selection	Q2	Applicant	
Prepare Bid Documents for ACM Abatement	Q2	EP	
ACM Abatement and Selective Demolition Contractor Selection(s)	Q2	Applicant	
TASK 4. CLEANUP ACTIVITIES			
Container Removal/Transport/Disposal	Q3	EP & Contractor	Removal of containers; lab reports; ACM abatement of building; selective demolition; final cleanup report
Asbestos Abatement	Q5	Applicant	
Asbestos Air Monitoring	Q5	EP	
Cleanup Report Preparation	Q6	EP	
Completion certification	Q7	EP	

c. Cost Estimates: Estimated unit and total costs for asbestos abatement activities are provided in the following table. Access to the second floor was limited during ACM survey activities due to worker safety concerns. Due to this limitation, a conservative approach of estimating the same amount of asbestos-containing materials on the second floor as present on the first floor was assumed. The following second floor abatement costs will only be incurred if, after an Engineering Analysis, the second floor is deemed to be structurally sound enough for abatement (believe to be unlikely). If the second floor is determined to be structurally unsound for abatement, then selective wet demolition costs will instead be incurred for second floor abatement.

ACM / PACM – Per Floor	AMOUNT	RATE	TOTAL
Red Floor Tile & Mastic - Building 1 Alley	3,600 sf	\$3.00/sf	\$10,800.00
Brown Floor Tile & Mastic – Building 2	4,500 sf	\$3.00/sf	\$13,500.00
Green Sheet Flooring & Mastic – Building 2	500 sf	\$3.00/sf	\$1,500.00
Adhesive – Building 2	5,000 sf	\$1.50/sf	\$7,500.00
White HVAC insulation – Building 3	400 linear ft	\$4.50/lf	\$1,800.00
Cream Texture – Building 3	6,000 sf	\$4.50/sf	\$27,000.00
Green Floor Tile & Mastic – Building 3	6,000 sf	\$3.00/sf	\$18,000.00
Dark Brown Floor Tile – Building 3	6,000 sf	\$1.50/sf	\$9,000.00
Brown Mastic – Building 3	6,000 sf	\$1.50/sf	\$9,000.00
HVAC Insulation (PACM)	13,000 lf	\$4.50/sf	\$58,500.00
		TOTAL (per floor)	\$156,600.00 per floor

Should selective demolition be necessary for the second floor, the anticipated costs (for abatement and additional material disposal) are provided in the table below. Abatement costs for the second-floor abatement (\$156,600.00) will not be incurred if an Engineering Analysis determines that the second floor is unsafe and that wet demolition must occur.

Selective Demolition – Second Floor	AMOUNT	RATE	TOTAL
Selective Demolition of Second Floor	112,000 sf	\$5.00/sf	\$560,000.00

(wet demolition instead of abatement due to worker safety considerations)			
		TOTAL	\$560,000.00

The anticipated costs for drum removal/disposal are provided in the table below.

Drum Removal/Disposal	AMOUNT	RATE	TOTAL
Refrigeration oil- ½ gallon container	½ Gallon	-	\$25.00
Chain Lubricant	55 Gallon	-	\$95.00
Unlabeled 5-gallon bucket	5 Gallon	-	\$50.00
Engine Clean – 35 Gallon drum	35 Gallons	-	\$95.00
Unlabeled – 35 Gallon drum	35 Gallons	-	\$95.00
Hydraulic Oil	1 Gallon	-	\$25.00
Lubricating compound	1 pint	-	\$25.00
Paint/Primer – 18	1 Gallon	-	\$75.00
Paint – 2	5 Gallons	-	\$75.00
Misc.	-	-	\$640.00
Waste Characterization (TCLP Analysis)	50 samples	\$200/sample	\$10,000.00
		TOTAL	\$11,200.00

The preparation of an Engineering Analysis for selective demolition for abatement, remedial Quality Assurance Project Plan (QAPP) development, plans and specifications along with bid documents must also be performed, and are anticipated to cost \$35,000.

The anticipated total budget for the tasks described in this proposal are provided in the following table.

COST ESTIMATES						
Budget Categories		Project Tasks (\$)				Total
		Project Mgmt/Administrative	Community Involvement	Cleanup Planning	Cleanup Activities	
Direct Costs	Personnel¹	\$20,000	\$5,000	\$5,000		\$30,000
	Travel	\$4,500 ²				\$4,500
	Equipment					
	Supplies					
	Contractual	\$9,000 ³	\$3,600 ⁴	\$35,000 ⁵	\$790,800 ^{6,7,8}	\$838,400
	Other					
Total Direct Costs		\$33,500	\$8,600	\$40,000	\$790,800	\$872,900
Indirect Costs						
Total Budget (Total Direct Costs+ Indirect Costs)		\$33,500	\$8,600	\$40,000	\$790,800	\$872,900

Cost Details

¹ City Project Director (\$50/hr) 400 hrs. for Project/EP oversight, grant management, reporting (\$20,000), 100 hrs. for planning and leading community involvement efforts (\$5,000), 100 hrs. for oversight of ACM/Drums competitive bid process (\$5,000) and competitive RFQ process for EP.

² City Project Director travel expenses for attendance at one National BF conference and one regional new grantee workshop: \$4,500 (airfare, conf. fee, hotel/per diem/expenses)

³ EP to assist with project mgmt/reporting: \$150/hr x 60 hrs. = \$9,000

⁴ EP to assist with community involvement and meeting attendance: \$150/hr x 24 hrs. = \$3,600

⁵ EP to assist with cleanup planning (Eng. Analysis, CAP, QAPP, bid docs): \$150/hr x ~234 hrs. = \$35,000

⁶ EP for cleanup actions: EP oversight (\$150/hr x 100 hrs. = \$15,000)

⁷ ACM Abatement/Selective Demo/Drum Disposal Contractor to remove/dispose containers (\$727,800 maximum) + air monitoring (\$800/day for 60 days = \$48,000).

⁸ Contractual costs for the demolition Contractor and asbestos abatement Contractor assume prevailing Davis-Bacon wage rates, as appropriate.

d. Measuring Environmental Results: The City will begin the cleanup project by submitting a Work Plan to the EPA that sets timelines, milestones, and project outputs and outcomes so that we can carefully track, measure, and evaluate progress. All outputs, results and eventual outcomes will be reported in the quarterly progress reports submitted to the EPA Project Officer via the EPA ACRES database, so that EPA can provide feedback on the quality of work, timeliness, and efficiency. The mechanism for tracking progress has already been established and proven with the successful execution of the 2019 CWA grant discussed in Section 4.b.i.,

which includes preparation of a detailed schedule for submittal of draft and final compliance reports with assignments; submittal of project schedules by the EP for each task with each task proposal; and project team biweekly meetings to review project status and to aid in the decision process. If progress is not meeting project timelines, the City will work with EPA, LDEQ, EP and Contractor(s), and establish root causes and corrective actions in order to get the project on track.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure, and ii. Description of Key Staff: Monroe's Economic Development Department will lead the Brownfield Project and cleanup grant, ensuring the timely and successful expenditure of funds and completion of all technical, administrative and financial requirements. The Economic Development Department has broad experience in redevelopment projects for economic growth. In addition, we can draw on knowledge and support from our Planning and Urban Development Department, including planners, zoning and code enforcement, and urban developers. The Administrative Department, including a staff of accountants and payment specialists, will conduct financial operations per the grant requirements. We also have on staff with the City clerical and information technology professionals, legal expertise, CAD draftsmen, and a GIS specialist to provide support as needed. The majority of City staff have experience working on and/or managing federal grants. Chief Economic & Cultural Development Officer, **Kelsea McCrary** will serve as **Project Director**. She has 12 years of experience in community development, public policy, and communications. She will support day-to-day project activities, as well as communications with EPA. **Meghan Risinger**, Executive Grant Writer, will serve as **backup to the Project Director**. She also assisted with Monroe's 2019 CWA Brownfields grant. **Stacey Rowell**, Director of Administration is a Certified Public Accountant with degrees in business management and accounting. She will assume **financial administration and reporting responsibilities**.

iii. Acquiring Additional Resources: Monroe will advertise a Request for Qualifications (RFQ) on the Monroe website, on the City's social media, and other media as appropriate, in order to retain an EP and Contractor(s) to assist with the Cooperative Agreement per the competitive requirements of 2 CFR Part 200 and 2 CFR Part 1500. The EP and Contractor(s) will assist in the project using employees experienced in the technical aspects of brownfield grants and in the abatement/removal/monitoring of ACM/hazardous substances cleanup and partial demolition. The procurements will follow the City's documented procurement procedures and be a fair and open competitive process. Disadvantaged Business Enterprises will have a fair opportunity to compete for all contract work. Monroe will assign a review team to use a ranking system of applicants in order to select an EP and Contractor(s), using evaluation criteria such as experience, ability, capacity, costs, and overall value. Any subawards will comply with EPA's Subaward Policy, though none are anticipated.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: In 2019, Monroe received an EPA Brownfields CWA Grant (Cooperative Agreement No. BF-01F65201-0) with Coalition Partners West Monroe, Louisiana, and Ouachita Parish Police Jury for assessment activities conducted between Nov. 1, 2019 and Sept. 30, 2022.

(1) Accomplishments: All phases of work were successfully completed under the grant. All outputs and outcomes were accurately reflected in the Assessment, Cleanup and Redevelopment Exchange System (ACRES) at the time of this application, and will continue to be updated with leveraged dollars as necessary. Monroe and its partners completed 1 Generic QAPP, 15 Phase I ESAs, 8 Property-specific Sampling & Analysis Plan (PSAPs), 7 Phase II ESAs, 6 ACM Surveys, 4 ABCAs/CAPs/RECAPs, 1 Revitalization Plan and 12 quarterly and annual reports. This included 3 more Phase I ESAs, 2 more PSAPs, and 1 more Phase II ESA than projected in the Work Plan. Community outreach was a priority through all phases of the project. We held 8 community outreach sessions, community visioning meetings, and a historic preservation commission meeting session, all to update and involve the community in the brownfields project. Stakeholders that participated in the process represented public and private sectors with a variety of interests, including downtown business owners, developers, bankers, riverfront property owners, and river recreationalists. QR code and text poll alternatives for participation were offered for those who needed virtual interaction.

(2) Compliance with Grant Requirements: Monroe complied with all workplans, schedules, and terms and conditions under the FY19 CWA grant with a history of timely and acceptable quarterly performance and grant deliverables, as well as ongoing ACRES reporting. All expected results of the Cooperative Agreement were achieved or exceeded. Monroe and its partners received a \$479,000 grant. Only 0.7% (\$3,338.54) remained at closeout, which is less than the cost of any ESA deliverable, demonstrating that every effort was made to spend the funds within the Period of Performance.

ATTACHMENTS

1. THRESHOLD CRITERIA
2. LETTER FROM LDEQ
3. DRAFT ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)
4. COMMUNITY NOTIFICATION NEWSPAPER EQUIVLENT AD (CITY OF MONROE WEBSITE)
5. COMMUNITY NOTIFICATION NEWSPAPER EQUIVLENT AD (SOCIAL MEDIA)
6. SUMMARY OF COMMENTS RECEIVED
7. APPLICANT'S RESPONSE TO PUBLIC COMMENTS
8. MEETING SUMMARY FROM PUBLIC MEETING
9. MEETING SIGN-IN SHEET

Attachment 1

THRESHOLD CRITERIA

Ouachita Candy Company, Monroe, LA
Threshold Criteria
FY23 EPA Brownfields Cleanup Grant

1. Applicant Eligibility

The City of Monroe, LA, is eligible for an EPA Brownfields Cleanup Grant as a General Purpose Unit of Local Government.

2. Previously Awarded Cleanup Grants

The Ouachita Candy Company target site in Monroe, LA, has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City of Monroe, LA, does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The City of Monroe, LA is the sole deed owner of the Ouachita Candy Company target site, which is the subject of this EPA Brownfields Cleanup Grant application. Monroe purchased the property on December 14, 2021.

5. Basic Site Information

- a) The name of the site for the purposes of this grant is Ouachita Candy Company.
- b) The site address is 211-305 Walnut St., Monroe, LA 71201.
- c) The City of Monroe, LA is the current owner of the site.

6. Status and History of Contamination at the Site

- a) The site is contaminated with hazardous substances.
- b) Historically, various portions of the property operated in a variety of functions, including as a Masonic Temple, a wood working facility, a residential site, a candy company and soft drink bottling company, an automotive repair facility with filling station that included vehicle washing and greasing operations, a vehicle maintenance area, a storage warehouse, and personal storage. Currently, the property is vacant and unused.
- c) Environmental concerns at the site include the following.
 - Interior building materials that are Asbestos Containing Material (ACM).
 - Containers and drums labeled as hazardous substances, including solvents, and refrigeration and engine oils. More drums of unknown contents possible.

d) The 112,000 square foot (sf), two-story building on the property has interior ACM building materials, and about 15 containers and drums labeled as hazardous materials onsite. The building was constructed in the 1920s. Additional renovations and buildout dates were not recorded, but they were likely conducted prior to regulations banning the use of asbestos in construction materials. The ACM is generally present in flooring materials, adhesives, coatings, and HVAC insulations. The exact source of the drums and containers of hazardous substances are unknown, but several industrial/commercial activities were found in the building's use history that might have been contributors, including:

- a bottling company that used a conveyor-belt system to move products,
- an automotive repair facility with filling station that conducted vehicle washing and vehicle greasing activities,
- a vehicle maintenance area,
- personal storage.

7. Brownfields Site Definition

The City of Monroe affirms that Ouachita Candy Company:

- a) is NOT listed or proposed for listing on the National Priorities List.
- b) is NOT subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- c) is NOT subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

Monroe was awarded an EPA Community-Wide Assessment (CWA) Grant in 2019, with coalition partners West Monroe and Ouachita Parish. Under that grant, Monroe conducted several environmental site assessments at Ouachita Candy Company to determine environmental conditions and submitted them to EPA (ACRES No. 243049).

- ASTM E1527-13 Phase I Environmental Site Assessment (ESA) prepared on June 10, 2020.
- Updated ASTM E1527-13 Phase I ESA prepared on September 21, 2021.
- ASTM E1903-19-equivalent Phase II ESA prepared on July 21, 2021.

9. Site Characterization

a. & b. are not applicable.

- c. The Ouachita Candy Company site is NOT eligible to be enrolled in a voluntary response program or State or Tribal equivalent oversight program. After reviewing the findings in the Phase II ESA concerning groundwater contaminant concentrations found onsite, LDEQ issued a "No Further Interest" Letter on October 18, 2021, stating that "based on

the limited information submitted, the Department does not intend to respond further regarding this matter” related to the groundwater contamination. The Phase II ESA also included findings on asbestos containing material (ACM) found at Ouachita Candy Company. All ACM identified at Ouachita Candy Company is limited to indoor abatement. Both LDEQ’s “No Further Interest” Letter and the ACM being limited to indoor abatement, demonstrate that Ouachita Candy Company is not eligible to be enrolled in a voluntary response program or State or Tribal equivalent oversight program.

- i. See attached letter from Louisiana Department of Environmental Quality.
- ii. A Qualified Environmental Professional (QEP), as defined in 40 CFR 312, has certified that there is a sufficient level of site characterization from the Phase II ESA performed on July 21, 2021 for the remediation work to begin on the site.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Ouachita Candy Company site for which Brownfields Grant funding is sought. There also are no known inquiries, or orders from government entities regarding the responsibility of any party (including Monroe) for the contamination, or hazardous substances at the site, including any liens.

11. Sites Requiring a Property-Specific Determination

The Ouachita Candy Company site does not require a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The site is contaminated with hazardous substances.

a. Property Ownership Eligibility – Hazardous Substance Sites

The City of Monroe meets the requirements for asserting an affirmative defense to CERCLA liability through bona fide prospective purchaser liability protection. Sections i. and ii. do not apply.

- iii. **LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**
 - (1) **Bona Fide Prospective Purchaser Liability Protection**

The City of Monroe asserts Bona Fide Prospective Purchaser (BFPP) Liability Protection and demonstrates compliance with the following requirements.

- The City of Monroe acquired title to the Ouachita Candy Company on December 14, 2021.
- The applicant conducted an all appropriate inquiry (AAI) investigation prior to acquiring the property by conducting a Phase I ESA All in compliance with ASTM E1527-13. The

report was dated September 21, 2021, and was conducted within 6 months prior to site acquisition. The Phase I ESA was conducted by an environmental professional (PPM Consultants, Inc.). The work was funded by the City's EPA Brownfields Community-wide Assessment Grant awarded in 2019.

- The City of Monroe is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination.
- The City of Monroe did not arrange for the disposal of hazardous substances before it acquired the site.
- The City of Monroe has and will exercise appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the site.
- The City of Monroe will comply with any land use restrictions and will not impede the effectiveness or integrity of any institutional controls associated with response actions at the site.
- The City of Monroe will provide full cooperation, assistance, and access to authorized persons.
- The City of Monroe will comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.
- The City will not impede performance of a response action or natural resource restoration.

(a) Information on the Property Acquisition

The following is information on the property acquisition.

- (i) The City of Monroe acquired ownership by negotiated purchases from private individuals.
- (ii) The City of Monroe acquired the property on December 14, 2021.
- (iii) The City of Monroe is the sole owner by fee simple purchase.
- (iv) The property was purchased from Bricks and Timbers, LLC (main building) and Laty McPhee, LLC (right-of-way access).
- (v) The City of Monroe does not have nor had a familial, contractual, corporate, or financial relationship or affiliation with any prior owner, operator, or other potentially responsible party of the property, including the entity from which the property was acquired.

(b) Pre-Purchase Inquiry

The City of Monroe conducted the following inquiries prior to taking ownership.

- (i) The City of Monroe performed the following assessments.

ASSESSMENT PERFORMED	REPORT DATE	FOR ENTITY
ASTM E1527-13 Phase I	June 10, 2020	City of Monroe under its 2019 CWA grant
Updated ASTM E1527-13 Phase I	September 21, 2021	City of Monroe under its 2019 CWA grant
ASTM E1903-19-equivalent Phase II ESA	July 21, 2021	City of Monroe under its 2019 CWA grant

- (ii) The ASTM E1527-13 Phase I ESAs were completed by an environmental professional, PPM Consultants, Inc., who has completed 29,000 environmental projects over nearly 30 years in 26 states.
- (iii) The Updated ASTM E1527-13 Phase I ESA was completed within 180 days prior to our acquisition of the property in order to take advantage of the bona fide prospective purchaser provision.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before the City of Monroe acquired the property. The City of Monroe did not cause or contribute to any release of hazardous substances at the site. The City of Monroe has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

Since the City of Monroe acquired ownership of the property, it has been vacant and unused. The City of Monroe has no relationship to prior users.

(e) Continuing Obligations

- (i) To stop any continuing releases, the City of Monroe has secured the building at the property and not allowed access to the building. As a vacant and unused building, there is no known activity at the building and none that would release hazardous substances.
- (ii) To prevent any threatened future release, the City of Monroe has already enforced land-use plans that limit the types of activity permitted for use at the property to those that do not require the use of hazardous materials. All construction materials used in renovations will be free of known hazardous substances.
- (iii) To prevent or limit exposure to any previously released hazardous substance, the City of Monroe has secured the site and building, and inspects the grounds on a periodic basis.

The City of Monroe affirms its commitment to:

- (i) Comply with any land use restrictions and not impede the effectiveness or integrity of

- an institutional controls;
- (ii) Assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) Provide all legally required notices.

13. Cleanup Authority and Oversight Structure

- a. Monroe will advertise a Request for Qualifications (RFQ) on the Monroe website, on the City's social media, and other media as appropriate, in order to retain an EP and Contractor(s) to assist with the Cooperative Agreement per the competitive requirements of 2 CFR Part 200 and 2 CFR Part 1500. The EP and Contractor(s) will assist in the project using employees experienced in the technical aspects of brownfield grants and in the abatement/removal/monitoring of ACM/hazardous substances cleanup and partial demolition. The procurements will follow the city's documented procurement procedures and be a fair and open competitive process. Disadvantaged Business Enterprises will have a fair opportunity to compete for all contract work. Monroe will assign a review team to use a ranking system of applicants in order to select an EP and Contractor(s), using evaluation criteria such as experience, ability, capacity, costs, and overall value. A responsive and responsible vendor(s) will then be selected. Any subawards will comply with EPA's Subaward Policy, though none are anticipated.
- b. Access to adjacent or neighboring properties will not be required. An additional community meeting will be held prior to conducting abatement activities to inform the community of the remediation activities and to address any concerns that may be raised. A public meeting has already been held to announce the project.

14. Community Notification

The City of Monroe provided the community with notice of our intent to apply for an EPA Brownfields Cleanup Grant and allowed the community an opportunity to comment on the draft application.

a. Draft Analysis of Brownfield Cleanup Alternatives

The City of Monroe allowed the community an opportunity to comment on the draft application, which included an attached draft ABCA. The draft ABCA was created as part of the 2019 CWA grant. The draft ABCA made available to the community is attached.

b. Community Notification Ad

The City of Monroe provided public notification on October 21, 2022 advertising the City's intent to apply for this cleanup grant, and for the community meeting scheduled

for October 27, 2022. Ads were placed on the City of Monroe website and on social media, both of which are Section 508-compliant web technologies to allow community members with disabilities access to the information. The social media post was also eligible for translation services through the application for community members with limited English proficiency. The ads are attached.

c. Public Meeting

A public meeting was held on October 27, 2022 to discuss the draft application and consider public comments prior to submittal of this application. The meeting was held in person at an Americans with Disabilities Act (ADA)-compliant facility. No persons with limited English proficiency were in attendance but would have been accommodated as needed. No comments were received, so no responses were required. Meeting notes and a sign-in sheet are provided as attachments.

d. Submission of Community Notification Documents

A copy of the draft ABCA, a copy of the equivalent newspaper ads that solicited application comment, a summary of comments received, applicant's responses to those public comments, meeting notes from the public meeting, and a meeting sign-in sheet are attached. No comments were received, so no responses were required.

15. Contractors and Named Subrecipients

• **Contractors**

Not applicable. The City of Monroe has not already selected a contractor that will be compensated with EPA funds made available under the RFA.

• **Named Subrecipients**

Not applicable. The City of Monroe will not engage a subrecipient to conduct the work proposed in this application.

Attachment 2

LETTER FROM LDEQ



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL ASSESSMENT

November 1, 2022

The Honorable Friday Ellis, Mayor
City of Monroe
P.O Box 123,
Monroe, LA 71210-0123

RE: Louisiana Department of Environmental Quality acknowledgement of the City of Monroe's FY23 Brownfield Cleanup Grant Application to the U.S. Environmental Protection Agency

Dear Mayor Ellis:

Thank you for your efforts to enhance Louisiana's environment, economy, and quality of life by addressing environmental concerns at vacant and underutilized sites in your community through the Brownfields Program. The Louisiana Department of Environmental Quality (LDEQ) acknowledges the City of Monroe's application for a Brownfield Cleanup Grant to address contamination at the former Ouachita Candy Company site in Monroe under the federal Small Business Liability Relief and Brownfields Revitalization Act and the Brownfields Utilization, Investment and Local Development Act.

Based on the information provided, remediation activities will be conducted under LDEQ's regular regulatory oversight programs as opposed to our Voluntary Remediation Program. LDEQ will provide regulatory oversight of the cleanup through our Surveillance and Remediation Divisions and our Brownfield Technical Liaison will continue to support your efforts with technical assistance as resources permit.

Also, as indicated in the correspondence dated Nov. 1, 2022, your Environmental Professional (as defined in 40 CFR § 312.10) has certified that there sufficient level of site characterization from the environmental site assessment activities performed to date for the remediation work to begin on the Ouachita Candy Company site in Monroe, Louisiana.

We look forward to partnering with you to facilitate the redevelopment of this Brownfield site! Please contact me at (504) 736-7069 or Rebecca.Otte@LA.gov if you have any questions or need further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca Otte".

Rebecca Otte, Brownfields Coordinator
Remediation Division, Office of Environmental Assessment

cc: Imaging Operations – IAS AI 178641

Attachment 3

DRAFT ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

**CITY OF MONROE
OUACHITA CANDY COMPANY
211-305 WALNUT STREET AND
RIGHT-OF-WAY ACCESS
MONROE, LOUISIANA**

ACRES NO. 243049

**EPA BROWNFIELDS COOPERATIVE
AGREEMENT BF-01F65201-0**

PPM PROJECT NO. 11472001/04-CP/01ABCA

JANUARY 6, 2022



ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

AT

**OUACHITA CANDY COMPANY
211-305 WALNUT STREET AND RIGHT-OF-WAY ACCESS
MONROE, LOUISIANA**

PREPARED FOR:

**CITY OF MONROE
700 WASHINGTON STREET
MONROE, LOUISIANA 71201**

PPM PROJECT NO. 11472001/04-CP/01ABCA

JANUARY 6, 2022

PREPARED BY:



**ANNIE MCILWAIN
SENIOR ENGINEER**

REVIEWED BY:



**JERE "TREY" HESS
BROWNFIELD DIRECTOR**

**PPM CONSULTANTS, INC.
SHAWN P. IVEY, P.G.
1600 LAMY LANE
MONROE, LA 71201
318/323-7270**

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1.0 INTRODUCTION AND BACKGROUND

This document presents an Analysis of Brownfield Cleanup Alternatives (ABCA) for cleanup of hazardous substances identified in the former Ouachita Candy Company facility located at 211-305 Walnut Street and Right-of-way (ROW) Access in Monroe, Louisiana. PPM Consultants (PPM) was retained by the City of Monroe to prepare this ABCA. The Ouachita Candy Company site is owned by Bricks and Timbers, LLC with the ROW access owned by Laty McPhee, LLC. The site is currently developed with a vacant commercial building. This ABCA has been prepared to provide summary information on the type and quantity of hazardous substances present at the site, alternatives for remediation of these substances, and recommendation of an alternative deemed to be most feasible to protect human health and the environment and to facilitate site redevelopment.

1.1 SITE DESCRIPTION AND HISTORY

1.1.1 Site Location and Description

The Ouachita Candy Company site [Assessment, Cleanup, and Redevelopment Exchange System (ACRES) No. 243049] is located at 211-305 Walnut Street in Monroe, Louisiana. The property includes five parcels under the ownership of two companies and encompasses approximately 3.3 acres of area and is located in Township 18 North and Range 3 East of the Monroe North Quadrangle (1994) United States Geological Survey (USGS) 7.5-minute Topographic Map. More specifically, the site is located at 32°30'10.52" North latitude and 92°07'9.92" West longitude. Site location is depicted in **Figure 1, Site Location Map** and **Figure 2, Site Map** in **Appendix A, Figures**.

The subject property includes three structures currently used for personal storage and a former railroad spur. The structures on the property are divided into several areas including:

- The northern structure (Building 1) is a vacant single-story warehouse with a service bay on the western end of the building. Building 1 is currently used for personal storage with two office areas. A covered alley is also a part of Building 1.
- The central building (Building 2) includes personal storage, an office area and a breakroom on the ground floor. A bottling area and storage area related to the previous use of the facility as a Coca-Cola producer and distributor are located on the second floor. Two chain-driven freight elevators are also located in Building 2.

- The southern building (Building 3) includes personal storage, an office area and electrical equipment on the ground floor. The second floor includes equipment related to the former operation of the building as a Coca-Cola producer and distributor. Building 3 also includes a chain-driven elevator.

1.1.2 Previous Land Use

The earliest available record for the subject property dated back to 1880 with the construction of the Western Star Masonic Temple on the southern portion of the subject property, as listed in a fire insurance map. The subject property included residences and the Masonic Temple from at least 1890 to at least 1920. The central portion of the site was also developed with a wood working facility in 1886. The northern portion of the site continued to be residential until at least 1926. During the early 1920s the southern and central portions of the subject property were developed with the Biedenharn building, including the Ouachita Candy Company and Coca Cola Bottling Company operations and warehousing space. The northern portion of the site was commercially developed between 1926 and 1932 with an automotive repair facility with filling station with vehicle washing and vehicle greasing operations. The vehicle maintenance area was incorporated into the use of the Ouachita Candy Company for truck fleet maintenance and stopped operating circa 1968 when the Coca Cola Bottling Company operations moved. The northern portion of the site was operated as a storage warehouse until at least 1986. The subject property has operated as personal storage since at least 1996 with the closure of Ouachita Candy Company.

1.1.3 Current Land Use

The subject property has been used for storage since 2010.

1.1.4 Future Land Use

Due to the historical significance of the site, the Ouachita Candy Company facility is proposed to be redeveloped into a commercial/retail space.

1.1.5 Surrounding Land Use

Adjoining properties to the ROW access include a vacant lot to the north, North Louisiana Children's Museum to the east, and a vacant lot to the west. Adjoining properties for the former Ouachita Candy Company include the North Louisiana Children's Museum to the northwest, a parking garage, Revival Design and Consign, the Monroe Chamber of

Commerce to the east, a parking lot to the southeast, Miro's restaurant to the south and the Ouachita River to the west.

1.2 SUMMARY OF PREVIOUS ENVIRONMENTAL INVESTIGATIONS

1.2.1 Phase I Environmental Site Assessment – June 10, 2020

A Phase I Environmental Site Assessment (ESA) was conducted by PPM on June 10, 2020, in order to identify environmental concerns on or affecting the Ouachita Candy Company site. The report listed the following recognized environmental conditions (REC):

- **Historical and current uses of the property.**
 - Former filling station- The 1932 Sanborn Fire Insurance Map illustrates the northeastern corner of the subject property as a filling station with two gas tanks. The 1950 Fire Insurance Map incorporates the filling station as part of the adjoining automotive repair portion of the structure and does not show fuel underground storage tanks (USTs) on the site. Louisiana did not require the registration of USTs until 1986 and would not have required UST closure sampling for USTs closed prior to 1950. No available regulatory information is available for the filling station or fuel USTs on the subject property. The condition of the USTs on the site is not known and it is possible the tanks are still present. The area illustrated as a filling station is currently incorporated as part of the storage area in the warehouse on the subject property and represent a vapor intrusion threat. The use of the subject property as a filling station in 1932 with fuel USTs is considered to represent a REC.
 - Former vehicle repair- The northern portion of the subject property is illustrated as car washing and greasing automotive repair facility in the 1932 Fire Insurance Map. The northern portion of the site was used as a garage for vehicles associated with the Coca Cola Bottling Company and Ouachita Candy Company until at least 1970. A specific activity involving petroleum products was “greasing” as notated on the northwest corner of the property by the 1932 and 1950 Sanborn Maps. A hazardous waste activity form was completed by HT Development in 2000 after locating and disposing of various drums of used oil and filters from an abandoned maintenance shop. Additionally, unknown drums were also identified in 2000 and disposed of offsite containing flammable contents. The 2000 Hazardous Waste Generator Form does not include any references to releases or subsurface investigation and notes that the facility had been unused for approximately 30 years. PPM did not observe any obvious areas of release;

however, automotive repair activities from at least 1932, to at least 1970 predate procedures for the proper handling and disposal of hazardous substance and petroleum products. Improper handling of hazardous substances by current standards may have occurred in this area, leading to the impact of site soils or groundwater from solvents, oils, or paints. PPM considers the use of the northern portion of the subject property for vehicle repair to represent a REC.

- Waterway loading- The western portion of the site in the 1926 Fire Insurance Map includes the use of an incline conveyor belt, carbide warehouse and coal bin along the eastern slope of the Ouachita River. The loading on the western portion of the subject property would have included manufactured goods along with goods stored in the warehouses of the Monroe Transfer and Warehouse Company, LA Paper Company, American Railway Express, and Ouachita Candy Company. It is not known if the goods stored in the warehouse are from the subject property in the 1926 and 1932 maps, or included the storage of hazardous substance containers. The presence of an electric motor and coal bin along the western boundary of the site does not eliminate the possibility that the engine may have been driven by a petroleum fuel system that would have required an UST or aboveground storage tank (AST). Based on the risks posed by a fuel storage system and the possibility of the transport or disposal of hazardous substance via the loading dock on the western boundary of the site, PPM considers the waterway loading, from at least 1926 to at least 1932, to represent a REC.
- Former UST- Louisiana Department of Environmental Quality (LDEQ) records include the documented removal of one 550-gallon gasoline UST from a tank pit on the western portion of the subject property in August 7, 1992, with one closure soil sample below laboratory detection limits for benzene, toluene, ethylbenzene and xylenes (BTEX). The 1992 closure sampling did not include total petroleum hydrocarbons – gasoline range organics (TPH-G) sampling or sampling for groundwater at the time of closure. Based on the lack of groundwater sampling and the lack of testing for all parameters associated with gasoline USTs, PPM considers the former UST on the western portion of the subject property to represent a REC.
- **Historical and current surrounding land uses.**
 - Former vehicle repair stations- The adjoining properties at 212 Walnut Street and 300 Walnut Street were historically utilized as automotive repair facility from at least 1926 to at least 1950. The adjoining property to the north at 225 Walnut

Street (currently 309 Walnut Street) operated as automotive repair facility from at least 1932 to at least 1950 within a structure adjoining the north side of the subject property boundary. The facility at 109 Washington Street or 300 Walnut Street included a gas tank illustrated approximately 160 feet east of the subject property along Washington Street. The assumed groundwater flow in this area is to the southeast, placing the subject property downgradient to the automotive repair facilities. Louisiana did not require the registration of the USTs until 1986 and a facility that closed prior to 1986 would not include UST closure sampling, or listed UST information. It is not known if the UST at the 109 Washington Street facility is currently present at the former repair shop property. No LDEQ records are available discussing the use of the automotive repair shops on the adjoining property. Based on the 25+ years of automotive service, the use of hazardous substances and petroleum products prior to the promulgation of Resource Conservation and Recovery Act (RCRA) standards, the proximity of the automotive repair facilities to the subject property, the unknown condition of the UST at 109 Washington Street, and the groundwater flow toward the subject property, PPM considers the repair shops on the adjoining properties at 212 and 300 Walnut Street to represent RECs.

- F. Strauss and Son Wholesale Produce USTs- The 1926, 1932 and 1950 Fire Insurance Maps illustrate three fuel USTs at the F. Strauss and Son Wholesale Produce facility at 313 Walnut Street. The USTs vary from approximately 80 feet to approximately 140 feet north of the subject property boundary. The USTs are not illustrated in the 1970 Fire Insurance Maps and no information on the USTs are available from the LDEQ database. If the USTs were closed prior to 1986, the USTs would not have been registered and UST closure would not have included soil or groundwater sampling. Groundwater in the area is assumed to flow to the southwest, toward the subject property. Due to the unknown condition of the USTs, the lack of soil sampling in the area, and the groundwater flow to the south-southeast toward the subject property, PPM considers the USTs at the F. Struss and Son facility from at least 1926 to at least 1950 to represent a REC.
- Ouachita Candy Company USTs- The parking lot on the adjoining property to the south was previously part of the Ouachita Candy Company operation, including the fuel USTs in two UST pits approximately 20 feet south of the subject property boundary and approximately 52 feet south of the subject property boundary. One 500-gallon UST was removed from the Ouachita Candy Company parking lot in 1992 with soil testing below the LDEQ Standards. The UST removed in 1989 appears to be in a similar location to the UST illustrated

in the 1950 Fire Insurance Map with the automotive parking area. A second UST was removed from the eastern portion of the parking lot approximately 20 feet south of the subject property boundary in 1996. The 1996 tank removal appears to be in a similar location to the UST illustrated near the southeastern corner of the subject property in 1932 and 1950 Fire Insurance Maps. Laboratory analysis of the soil samples collected during UST closure in 1996 suggested that the product in the UST was a type of petroleum solvent, mineral spirit, or kerosene. At the time of the release, the parking lot on the adjoining property to the south was part of the Ouachita Candy Company facility. The 1997 Site Investigation (SI) Report states that MW-1, the closest groundwater monitoring well to the subject property had no detectable levels of BTEX or TPH-G. According to the No Further Action (NFA), the area of investigation was closed in accordance with the UST Cleanup Level MATRIX using Cleanup Level 3 Standards (the MATRIX Standards predate the current Risk Evaluation/Corrective Action Program (RECAP) Standards). Subsurface investigative activities, along with all remediation and monitoring activities, were relegated to the parking lot parcel. The groundwater laboratory results were below UST MATRIX standards for four consecutive quarters by 2002, however remaining concentrations in soil restricted site use to industrial usage. Since the release occurred prior to the creation of the current RECAP Standards, the 1996 UST release was evaluated under the MATRIX Standards. The associated 2006 Conveyance Notice filed with the Ouachita Parish Courthouse identifies the Area of Investigation (AOI) as Ouachita Candy Company at 215 Walnut Street with a site map that illustrates the adjoining parking lot. During research for this facility PPM was unable to identify the extent of the Application of Use restriction and therefore unable to identify the application of the MATRIX Soil Closure Standards. The 2006 NFA document also includes a site map for groundwater plume delineation across the investigative area known as the Ouachita Candy Company. The plume illustration in the 2006 NFA indicates that the extent of hydrocarbon impact to the groundwater was not delineated toward the north, with illustrated and assumed groundwater contamination on the current subject property that may exceed RECAP Standards. Mr. Loup of LDEQ explained that the Conveyance Notice Use Restriction was required for the area of investigation and should be associated with the release area in the parking lot. He stated that the release was closed under MATRIX Standards and that if soil or groundwater samples collected on the subject property exceeded RECAP Standards, then the previous Cleanup Standards for the release and the removal of the tanks, would be taken into consideration by LDEQ when deciding if further evaluation is necessary. It

is LDEQ department policy to not reopen remediation cases that have been closed under previous standards unless new information presents a threat to the environment. Remediation guidelines under the MATRIX Standards did not evaluate sites for vapor intrusion into enclosed structures and did not include delineation or subsurface investigative activities on the subject property. Based on the risk of vapor intrusion to the structure on the subject property, the lack of delineation or subsurface investigation of the subject property, and the risk of soil or groundwater impact above RECAP Screening Standards on the subject property, the former Ouachita Candy Company USTs on the adjoining parking lot property are considered to represent a REC.

Photographs of the property taken during the Phase I ESA site visit are included in **Appendix B, Photographs**.

1.2.2 Phase II Environmental Site Assessment and Asbestos-Containing Materials Survey – June 2021 through July 2021.

A Phase II ESA was conducted by PPM, and an asbestos-containing materials (ACM) survey was conducted by PAC Environmental Specialists (PPM's subcontractor). PPM field work was conducted from June 8, 2021, through June 17, 2021, and the Phase II ESA report was completed on July 21, 2021. The ACM survey was conducted from June 15, 2021, through June 29, 2021, and the report was completed on July 8, 2021. PPM's Phase II ESA portion of this project was conducted in order to identify soil and/or groundwater contamination associated with RECs identified in the June 2020 Phase I ESA for the site. The scope of work for the Phase II ESA consisted of the following:

- Call "One Call" to locate and mark underground utility lines three days prior to start of fieldwork.
- Advancement of six probe borings to a maximum of 20.0 feet below ground surface (BGS), utilizing a Geoprobe[®] truck-mounted rig.
- Collection of soil samples at continuous 2-foot intervals from each of the probe borings for field screening and possible laboratory analysis.
- Field screening conducted using headspace analysis techniques with a Photo-Ionization Detector (PID) and visual inspection of soil samples. A sample from each interval retained at 4°C for possible laboratory analysis.
- Analysis of soil and groundwater samples collected from probe borings P-1 and P-2 for BTEX, TPH-G, total petroleum hydrocarbons as diesel (TPH-D), and total

petroleum hydrocarbons as oil (TPH-O), and polycyclic aromatic hydrocarbons (PAH).

- Analysis of soil and groundwater samples collected from probe boring P-3 for BTEX, TPH-G, TPH-D, TPH-O, PAH and the eight RCRA Metals.
- Analysis of soil and groundwater samples collected from probe borings P-4 and P-6 for BTEX, TPH-G and TPH-D.
- Analysis of soil and groundwater samples collected from probe boring P-5 for BTEX and TPH-G.
- Analysis of the highest concentration of each constituent in soil samples collected from 0 to 15 feet and greater than 15 for Synthetic Precipitation Leaching Procedure (SPLP) for BTEX, TPH-G, TPH-D, TPH-O, PAH and RCRA Metals.
- Collection of one soil sample for analysis of Toxicity Characteristic Leaching Procedure (TCLP) and Reactive Cyanide, Reactive Sulfide, Ignitability, Corrosivity (RCI) for landfill profile of soil cuttings.
- Collection of quality assurance/quality control (QA/QC) samples per the EPA-approved generic Quality Assurance Project Plan (QAPP).
- Installation of six temporary probe wells, one in each probe boring, to aid in the collection of groundwater samples from the temporary wells.
- Collection of one groundwater sample from temporary wells TW-1 and TW-2 for laboratory analysis of BTEX, TPH-G, TPH-D, TPH-O and PAH.
- Collection of one groundwater sample from temporary well TW-3 for laboratory analysis of BTEX, TPH-G, TPH-D, TPH-O, PAH and RCRA Metals.
- Collection of one groundwater sample from temporary wells TW-4 and TW-6 for laboratory analysis of for BTEX, TPH-G and TPH-D.
- Collection of one groundwater sample from temporary well TW-5 for laboratory analysis of for BTEX and TPH-G.
- Disposal of soil cuttings at a permitted landfill.
- Conduct a survey to determine if ACM are present in the on-site building.
- Preparation of a Phase II ESA Report for the site presenting the scope of work, site background, investigative methodology, findings and conclusions from the Phase II ESA field activities.

PPM retained PAC Environmental Specialists, a Louisiana-licensed asbestos inspector, to conduct an asbestos survey of the subject property, as required by EPA regulation 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAP) prior to demolition or renovation. The asbestos inspector conducted a visual assessment of the building to identify materials suspected of containing asbestos (suspect ACM) such as thermal system insulation, surfacing materials and miscellaneous materials (e.g., floor tiles). Suspect materials were physically assessed for friability and evidence of damage or degradation. Samples of suspect ACM were collected for laboratory analysis. Bulk sample collections were conducted in general accordance with the sampling protocols outlined in USEPA 40 CFR 763.86. Samples were collected from each homogenous area of the structure to identify the presence of ACM. The samples collected were analyzed for asbestos content by Polarized Light Microscopy (PLM), using the “Interim Method of the Determination of Asbestos in Bulk Insulation Samples”. Laboratory Analysis was performed by Eurofins/CEI Labs in accordance with US EPA and LDEQ accreditation requirements and methodologies.

Deviations from the original scope of work were as follows:

- Locations of P-1/TW-1 and P-2/TW-2 were shifted south 15 feet from their proposed locations due to refusal at 8 feet BGS.
- Soil borings were advanced to a maximum depth of 25 feet BGS due to insufficient groundwater recharge at a maximum depth of 20 feet BGS.
- **Due to a flea infestation in the building, unsafe conditions in portions of the building, and inaccessibility to the roof, asbestos samples were not collected in parts of the building.**

Findings and conclusions from the July 2021 Phase II ESA and ACM Survey were as follows:

- **Subsurface Investigation Findings and Conclusions.**
 - Laboratory analysis of soil samples collected revealed that constituent concentrations in all soil samples were below the LDEQ RECAP Soil Screening Standards. Concentrations that were detected in the soil are presented in **Figure 3, Constituent Concentrations in Soil in Appendix A.**
 - Laboratory analysis of groundwater samples revealed that constituent concentrations in all groundwater samples were below the LDEQ RECAP Groundwater Screening Standards with the exception of TPH-D and benzo(a)-pyrene. However, subsequent to conducting a Management Option

1 (MO-1) RECAP evaluation, all contaminants of concern (COC) in groundwater were below the RECAP Standards. Concentrations that were detected or had detection limits above the RECAP Screening Standards in groundwater are presented in **Figure 4, Constituent Concentrations in Groundwater** in **Appendix A**.

- **ACM Survey Findings and Conclusions.** According to the analytical results, 11 of the 44 samples collected were identified to contain asbestos. This conclusion is based on the EPA definition of an ACM as material composed of “...greater than 1% asbestos.” The identified ACMs are as follows:
 - **Brown Floor Tile & Black Mastic (B2-01).** This material, which is located in Building 2, was determined to contain 5 percent and 3 percent chrysotile asbestos, respectively.
 - **Green Sheet Flooring & Yellow Mastic (B2-02).** This material, which is located in Building 2, was determined to contain 25 percent and 3 percent chrysotile asbestos, respectively.
 - **Adhesive (B2-04 B).** This material, which is located in Building 2, was determined to contain 3 percent chrysotile asbestos.
 - **White HVAC Insulation (B3-03 Layer 1).** This material, which is located in Building 3, was determined to contain 65 percent chrysotile asbestos.
 - **Cream Texture (B3-08 Layer 1).** This material, which is located in Building 3, was determined to contain 2 percent chrysotile asbestos.
 - **Green Floor Tile & Black Mastic (B-3-09).** This material, which is located in Building 3, was determined to contain 5 percent and 3 percent chrysotile asbestos, respectively.
 - **Dark Brown Floor Tile (B3-10 A).** This material, which is located in Building 3, was determined to contain 3 percent chrysotile asbestos.
 - **Brown Mastic (B3-12 B).** This material, which is located in Building 3, was determined to contain 5 percent chrysotile asbestos.
 - **HVAC Insulation and Components.** Although they were not sampled, all HVA insulation and associated components are Presumed Asbestos-Containing Building Materials (PACM).

Based on results from the Phase II ESA and ACM Survey, PPM recommended that the owner/operator of the property notify the LDEQ that constituent concentrations in

groundwater exceed RECAP Screening Standards. Since all concentrations in soil and groundwater are below the applicable MO1 Standards, LDEQ will likely not require any additional actions at the site.

Additionally, PAC Environmental Specialists recommended that prior to demolition or renovation activities to the buildings, the LDEQ must be notified via LDEQ Form AAC-2.

1.2.3 Asbestos-Containing Materials & Lead-Based Paint Survey – September 13, 2021

ALTEC Environmental Consulting, LLC (ALTEC) conducted Asbestos & Lead Sampling and presented their results in a report dated September 3, 2021. Two samples of **Red 9x9 Floor Tile (CM-21-244)** were collected. Sample results revealed that the red 9x9 floor tile, which is located in the covered alley portion of Building 1, contains 8% chrysotile asbestos. For the lead-based paint (LBP) survey, there were 36 sample locations with at least six samples taken from each of the buildings surveyed. All samples collected were below the U.S. Department of Housing and Urban Development (HUD) level of 1.0 milligrams per square centimeter (mg/cm²) and are therefore not considered to be LBP.

1.2.4 Phase I Environmental Site Assessment – September 21, 2021

An updated/new Phase I ESA was conducted by PPM on September 21, 2021, in order to identify environmental concerns on or affecting the Ouachita Candy Company site – following Phase II ESA findings. The updated Phase I ESA revealed no evidence of RECs in connection with the property. RECs identified in the June 2020 Phase I ESA were ruled out based on the following reasoning and updated information:

- **Former filling station.** The 1932 Sanborn Fire Insurance Map illustrates the northeastern corner of the subject property as a filling station with two gas tanks. The 1950 Fire Insurance Map incorporates the filling station as part of the adjoining automotive repair portion of the structure and does not show the fuel USTs on the site. Louisiana did not require the registration of USTs until 1986 and would not have required UST closure sampling for UST closed prior to 1950. No available regulatory information is available for the filling station or fuel USTs on the subject property. The condition of the USTs on the site is not known and it is possible the tanks are still present. The area illustrated as a filling station is currently incorporated as part of the storage area in the warehouse on the subject property and represent a vapor intrusion threat. PPM sampled soil and groundwater in probe borings P-1 and P-2

during a 2021 Phase II ESA in order to assess possible soil and groundwater impacts from the former filling station on the subject property. The Phase II ESA found all sampled concentrations in soil to be below LDEQ screening standards in these locations. The 2021 Phase II ESA identified elevated concentrations of TPH-D in groundwater samples from probe boring PB-2 and laboratory testing minimums above LDEQ screening standards for benzo-(a)-pyrene in groundwater samples for probe borings PB-1 and PB-2. However, further evaluation of the sampling results under LDEQ RECAP confirmed all concentrations in groundwater were below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a no further interest (NFI) letter would be issued for the Phase II ESA findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the former filling station to represent a REC.

- **Former vehicle repair.** The northern portion of the subject property is illustrated as car washing and greasing automotive repair facility in the 1932 Fire Insurance Map. The northern portion of the site was used as a garage for vehicles associated with the Coca Cola Bottling Company and Ouachita Candy Company until at least 1970. A specific activity involving petroleum products was “greasing” as notated on the northwest corner of the property by the 1932 and 1950 Sanborn Maps. A Hazardous Waste Activity Form was completed by HT Development in 2000 after locating and disposing of various drums of used oil and filters from an abandoned maintenance shop. Additionally, drums containing flammable contents were identified in 2000 and disposed of offsite. The 2000 Hazardous Waste Generator Form does not include any references to releases of subsurface investigation and notes that the facility had been unused for approximately 30 years. PPM did not observe any obvious areas of release; however, automotive repair activities from at least 1932 to at least 1970 predate procedures for the proper handling and disposal of hazardous substance and petroleum products. Improper handling of hazardous substances by current standards may have occurred in this area, leading to impact of site soils or groundwater from solvents, oils, or paints. PPM sampled soil and groundwater in probe boring P-3 during a 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former automotive repair activities on the subject property. The Phase II ESA found all sampled concentrations in soil to be below LDEQ screening standards in this location. The 2021 Phase II ESA identified laboratory testing minimums above LDEQ screening standards for benzo-(a)-pyrene in the groundwater sample collected from probe boring PB-3. Further evaluation of the sampling results under LDEQ RECAP confirmed the benzo-(a)-pyrene

concentration in groundwater was below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be issued for the Phase II ESA findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter PPM does not consider the former automotive repair activities to represent a REC.

- **Waterway loading.** The western portion of the site in the 1926 Fire Insurance Map include the use of an incline conveyor belt, carbide warehouse and coal bin along the eastern slope of the Ouachita River. The loading on the western portion of the subject property would have included manufactured goods along with goods stored in the warehouses of the Monroe Transfer and Warehouse Company, LA Paper Company, American Railway Express, and Ouachita Candy Company. It is not known if the goods stored in the warehousing area of the subject property in the 1926 and 1932 Maps included the storage of hazardous substance containers. The presence of an electric motor and coal bin along the western boundary of the site does not eliminate the possibility that the engine may have been driven by a petroleum fuel system that would have required a UST or AST. PPM sampled soil and groundwater in probe boring P-4 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the water way loading area on the subject property. The Phase II ESA revealed all concentrations in soil and groundwater samples were below LDEQ screening standards in this location. Therefore, based on the findings of the Phase II ESA PPM does not consider the waterway loading area to represent a REC.
- **Former UST.** LDEQ records include the documented removal of one 550-gallon gasoline UST from a tank pit on the western portion of the subject property on August 7, 1992, with the one closure soil sample below laboratory detection limits for BTEX. The 1992 closure sampling did not include TPH-G sampling or sampling for groundwater at the time of closure. PPM sampled soil and groundwater in probe boring P-5 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former UST on the subject property. The Phase II ESA found all concentrations in soil and groundwater samples to be below LDEQ screening standards in this location. Therefore, based on the findings of the Phase II ESA PPM does not consider the former UST to represent a REC.
- **Historical and current surrounding land uses.**
 - **Former vehicle repair stations.** The adjoining properties at 212 Walnut Street and 300 Walnut Street were historically utilized as automotive repair facilities from at least 1926 to at least 1950. The adjoining property to the

north at 225 Walnut Street (currently 309 Walnut Street) operated as an automotive repair facility from at least 1932 to at least 1950 within a structure adjoining the northern side of the subject property. The facility at 109 Washington Street or 300 Walnut Street included a gas tank illustrated approximately 160 feet east of the subject property along Washington Street. The assumed groundwater flow in this area is to the southwest, placing the subject property down-gradient to the automotive repair facilities. Louisiana did not require the registration of USTs until 1986, and a facility that closed prior to 1986 would not include UST closure sampling or listed UST information. It is not known if the UST at the 109 Washington Street facility is currently present at the former repair shop property. No LDEQ records are available discussing the use of the automotive repair shops on the adjoining property. PPM sampled soil and groundwater in probe borings P-1, P-2 and P-3 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former automotive repair facilities and USTs on adjoining properties. The Phase II ESA found all concentrations in soil samples to be below LDEQ screening standards in these locations. The 2021 Phase II ESA identified elevated concentrations of TPH-D in groundwater samples from probe borings P-1 and P-3 and laboratory testing minimums above LDEQ screening standards for benzo(a)-pyrene in groundwater samples for probe borings P-1, P-2 and P-3. However, further evaluation of the sampling results under LDEQ RECAP confirmed all concentrations in groundwater were below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be issued for the Phase II ESA findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the former automotive repair and USTs on the adjoining properties to represent a REC.

- **F. Strauss and Son USTs.** The 1926, 1932 and 1950 Fire Insurance Maps illustrate three fuel USTs at the F. Strauss and Son Wholesale Produce facility at 313 Walnut Street. The USTs vary from approximately 80 feet to approximately 140 feet north of the subject property boundary. The USTs are not illustrated in the 1970 Fire Insurance Maps, and no information about the USTs is available from the LDEQ database. If the USTs were closed prior to 1986, the USTs would not have been registered and UST closure would not have included soil or groundwater sampling. Groundwater in the area is assumed to flow to the southwest, toward the subject property. PPM sampled

soil and groundwater in probe borings P-1, P-2 and P-3 during the 2021 Phase II ESA in order to address the possible soil and groundwater impacts from the F Strauss and Son USTs on the adjoining property. The Phase II ESA found all concentrations in soil samples to be below LDEQ screening standards in these locations. The 2021 Phase II ESA identified elevated concentrations of TPH-D in groundwater samples from probe borings P-1 and P-3 and laboratory testing minimums above LDEQ screening standards for benzo(a)-pyrene in groundwater samples for probe borings P-1, P-2 and P-3. However, further evaluation of the sampling results under LDEQ RECAP confirmed all concentrations in groundwater were below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be issued for the Phase II findings on the subject property. Therefore, based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the F Strauss and Son USTs on the adjoining properties to represent a REC.

- **Ouachita Candy Company USTs.** The parking lot on the southern adjoining property was previously part of the Ouachita Candy Company operation, including the fuel USTs in two UST pits approximately 20 feet south of the subject property boundary and approximately 52 feet south of the subject property boundary. One 500-gallon UST was removed from the Ouachita Candy Company parking lot in 1992 with soil sample concentrations below LDEQ Standards. This UST removed in 1989 appears to be in a similar location to the UST illustrated in the 1950 Fire Insurance Map with the automotive parking area. A second UST was removed from the eastern portion of the parking lot approximately 20 feet south of the subject property boundary in 1996. The 1996 tank removal appears to be in a similar location to the UST illustrated near the southeastern corner of the subject property in 1932 and 1950 Fire Insurance Maps. Laboratory analysis of the soil samples collected during UST closure in 1996 suggested that the product in the UST was a type of petroleum solvent, mineral spirit, or kerosene. At the time of the release, the parking lot on the adjoining property to the south was part of the Ouachita Candy Company facility. The 1997 SI report states that MW-1, the closest groundwater monitoring well to the subject property had no detectable levels of BTEX or TPH-G. According to the NFA, the area of investigation was closed in accordance with the UST Cleanup Level MATRIX using Cleanup Level 3 Standards (the MATRIX Standards predate the current RECAP Standards). Subsurface investigative activities, along

with all remediation and monitoring activities were relegated to the parking lot parcel. The groundwater laboratory results were below UST MATRIX Standards for four consecutive quarters by 2002, however remaining concentrations in soil restricted site use to industrial usage. Since the release occurred prior to the creation of the current RECAP Standards, the 1996 UST release was evaluated under the MATRIX Standards. The associated 2006 conveyance notice filed with the Ouachita Parish courthouse identifies the AOI as Ouachita Candy company at 215 Walnut street with a site map that illustrates the adjoining parking lot. During research for this facility PPM was unable to identify the extent of the application of the use restriction and therefore unable to identify the application of the MATRIX Soil Closure Standards. The 2006 NFA document also includes a site map for groundwater plume delineation across the investigative area known as the Ouachita Candy Company. The plume illustration in the 2006 NFA indicates that the extent of hydrocarbon impact to the groundwater was not delineated toward the north, with illustrated and assumed groundwater contamination on the current subject property that may exceed RECAP Standards. Mr. Loup of LDEQ explained that the Conveyance Notice use restriction was required for the AOI and should be associated with the release area in the parking lot. He stated that the release was closed under MATRIX Standards and that if soil or groundwater samples collected on the subject property exceeded RECAP Standards, then the previous cleanup standards for the release and the removal of the tanks would be taken into consideration by LDEQ when deciding if further evaluation is necessary. It is LDEQ department policy to not reopen remediation cases that had been closed under previous standards unless new information presents a threat to the environment. Remediation guidelines under the MATRIX Standards did not evaluate sites for vapor intrusion into enclosed structures and did not include delineation or subsurface investigative activities on the subject property. PPM sampled soil and groundwater in probe boring P-6 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former USTs on the adjoining property. The Phase II ESA found all concentrations in the soil sample to be below LDEQ screening standards in this location. The 2021 Phase II ESA identified an elevated concentration of TPH-D in the groundwater samples collected from probe boring P-6. However, further evaluation of the sampling results under LDEQ RECAP confirmed the concentration in groundwater was below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be

issued for the Phase II findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the former USTs on the adjoining property to represent a REC.

Following the completion of the Phase I ESA (dated September 21, 2021), LDEQ issued a NFI Letter on October 18, 2021.

1.3 EXPOSURE PATHWAYS OF CONCERN

ACM is a concern because asbestos minerals have a tendency to separate into microscopic-size particles that can remain in the air and be inhaled. Persons occupationally exposed to asbestos have developed several types of life-threatening diseases, including asbestosis and lung cancer. Although the use of asbestos and asbestos products has dramatically decreased, they are still found in many residential and commercial settings and continue to pose a health risk to workers and occupants. Identified ACM in the main building was non-friable, which means that it does not pose an immediate threat to the surrounding environment or public. However, because the City hopes to either renovate or demolish the main building on the subject property, asbestos abatement will be necessary before such activities can occur because renovation and/or demolition activities can cause non-friable ACM to become friable. Should ACM become friable, risk pathways would include: ingestion, and inhalation of potentially hazardous materials and substances by site visitors and/or trespassers. However, the greatest threat would be to construction workers during renovation and abatement activities, which potentially pose an exposure risk through inhalation, ingestion and contact unless proper personal protective equipment (PPE) is utilized.

1.4 PROPOSED SITE REDEVELOPMENT

The proposed site redevelopment has not been determined at this time. Given the current zoning of the site, a commercial use has been assumed in developing this ABCA. Should a mixed-use development, with a residential component, be considered; additional requirements may be necessary.

2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.1 ASBESTOS IN BUILDING STRUCTURES/MATERIALS

2.1.1 Regulatory Requirements

In accordance with the NESHAP, 40 CFR Part 61, Subpart M, Regulated Asbestos-Containing Material (RACM) is required to be removed prior to renovations that would disturb the asbestos containing materials. The State of Louisiana has established Chapter 27 of Louisiana Administrative Code (LAC 33:III Chapter 27) to regulate the identification, management, and abatement of ACM in schools and state buildings; and while the Ouachita Candy Company buildings are not anticipated to be reused as a school or state building, it is considered good practice to consider these requirements to ensure protection of health, safety and the environment. All asbestos-related activity must be conducted by an individual or company accredited by the State of Louisiana, through the LDEQ. An asbestos-related activity consists of the disturbance (whether intentional or unintentional) or abatement of ACM, the performance of asbestos surveys, the development of management plans and response actions, asbestos project design, the collection or analysis of asbestos samples, monitoring for airborne asbestos or any other activity required to be accredited under LDEQ Chapter 27 Appendix A.

In non-state, non-school buildings, the State of Louisiana sets forth emission standards for asbestos under Chapter 51 (LAC 33:III Chapter 51). Per Chapter 51 Section P, the following activities, when conducted, must be performed by accredited individuals: asbestos surveys, asbestos abatement, and monitoring for airborne asbestos.

Prior to renovations or demolitions, LDEQ requires a (1) NOTIFICATION OF DEMOLITION AND RENOVATION AND ASBESTOS CONTAMINATED DEBRIS ACTIVITY FORM [AAC-2(a)], or (2) ASBESTOS NOTIFICATION OF RENOVATION AND/OR DEMOLITION NEGATIVE DECLARATION FORM [AAC-2(b)].

The AAC-2(a) form is required when requesting Asbestos Disposal Verification Forms (ADVF) for Asbestos Contaminated Debris Activities (ACDA), Demolition, Renovation, and/or Response Action projects where RACM is present, or assumed to be present, above the established thresholds, when greater than 3 linear or 3 square feet of ACM is stripped, dislodged, cut, drilled, or similarly disturbed in a school or state building, or as otherwise required by LAC 33:III.5151.F.1. To track and substantiate the proper disposition of asbestos at a Recognized Asbestos Landfill (RAL), waste shipment records, referred to as ADVFs,

are required to be originated and signed by the waste generator or the owner or operator of a demolition, or renovation, response action or asbestos-contaminated debris (ACD) activity.

2.1.2 Cleanup Standards

Even though cancer risks from exposure to asbestos are most appropriately viewed as chronic concerns, short-term standards have been established by OSHA to limit exposures of workers in the workplace. There are two types of short-term limits, as follows:

- Short-term Exposure Limit (STEL): 1.0 fibers per cubic centimeters as detected using phase-contrast microscopy (PCM fcc/cc)
- Eight-hour Time-Weighted Average (TWA) Permissible Exposure Limit (PEL)]: 0.1 PCM f/cc

EPA Asbestos Hazard Emergency Response Act (AHERA) regulations, (40 CFR 763) require aggressive clearance sampling after asbestos abatement activity. Leaf blowers and fans are used to disturb interior air and air samples are collected according to the standard method set forth in Appendix A of Subpart E of 40 CFR Part 763. The clearance criteria as set forth in this regulation are:

- PCM clearance criteria (for small areas): 0.01 f/cc
- Transmission Electron Microscopy (TEM) clearance criteria: 70 structures per square millimeter on the filter, or no significant increase from exterior air sample results

Although AHERA regulations apply to abatement in schools, the same standards are generally used for commercial abatement projects and are recommended to be followed on this project.

2.2 CONTAMINANTS OF CONCERN IN SOIL AND GROUNDWATER

Soils and groundwater were sampled for analysis of COCs including BTEX, TPH-G, TPH-D, TPH-O, PAH, and the eight RCRA metals. Since these COCs were not detected at concentrations that would warrant corrective action, a discussion of regulatory and cleanup standards is not required. Furthermore, LDEQ issued a NFI Letter subsequent to review of the Phase II ESA report.

3.0 CLEANUP ALTERNATIVE EVALUATION

3.1 ASBESTOS CONTAINING MATERIALS

Alternatives for addressing the asbestos in the Ouachita Candy Company facility were evaluated based on their effectiveness, implementability, resiliency to address potential adverse impacts caused by extreme weather events, cost and reasonableness. These alternatives are presented below.

3.1.1 Alternative 1 – No Action and Building Left Intact

A “No-Action” alternative would leave the building in its present condition and all ACM in place. Implementation would not be difficult; however, the continued presence of ACM in the building would create more opportunities for the non-friable material to become friable, thereby potentially affecting the health and wellbeing of the surrounding population. The only advantages to the No-Action Alternative are those related to immediate avoidance of expenses that would be incurred by taking action. However, in the long term, expenses associated with this alternative may exceed those related to taking action at the present time due to the continued deterioration of the condition of the building and an inability to sell or lease the building for renovation or reuse. The No-Action Alternative would be highly ineffectual in achieving the goals of reduction of health risks and facilitating the redevelopment of the property. The second floors of the buildings are in poor condition and may be allowing weather impacts to the buildings, which can contribute to deterioration of ACM. The buildings are not resilient against extreme weather because of these weak portions of the second floor; therefore, extreme weather events could result in migration of asbestos offsite.

Direct costs associated with the No-Action Alternative and associated non-use of the building would be no additional cost because currently maintenance and repairs are not being done on the building. Indirect costs could include the continuing inability to obtain private-sector interest in the building for leasing and renovation/reuse of the building or redevelopment of the site.

3.1.2 Alternative 2 – Removal of All Identified and Presumed ACM for Building Renovation

This option would include removal of all identified and presumed ACM for the purpose of renovating the building. All considered friable ACM must be removed prior to building

renovation, and all ACM that may become friable during renovation must also be abated. Because existing non-friable ACM will likely become friable with the significant building renovations, it is suggested that all identified and presumed ACM (including presumed ACM on the rooftop) be abated and disposed of properly.

This activity would be considered Class II work by OSHA (29 CFR 1926.1101) and requires worker and supervisor asbestos training. An OSHA Competent Person must be on site during abatement to ensure proper engineering controls and work practices are utilized and to recognize suspect ACM. The abatement debris must be disposed of in a landfill that accepts non-friable asbestos containing materials. NESHAP also requires a 10-working-day notification to the LDEQ prior to the start date of an abatement project.

Alternative 2 would be highly effective in achieving the goal of reduction of potential exposures to asbestos for individuals entering the building as well as integral to the renovation of the building for residential and commercial mixed use. Alternative 2 would be resilient and would eliminate offsite migration concerns in the event of extreme weather. Preliminary costs for this Alternative (abatement only, not including renovation costs) are estimated to be **\$350,700.00** assuming 2 floors that are similar in nature (details provided below). **Please note that cost estimates are based only on first floor results and should not be used for bid purposes.**

- Plans & specifications and bid specifications preparation = \$15,000.00
- Asbestos abatement activities (first floor only) = \$156,600.00 (detailed below):
 - 3,600 square feet of red floor tile in Building 1 covered alley x \$3/square foot = \$10,800.00
 - 4,500 square feet of brown floor tile & black mastic in Building 2 x \$3/square foot = \$13,500.00
 - 500 square feet of green sheet flooring & yellow mastic in Building 2 x \$3/square foot = \$1,500.00
 - 5,000 square feet of adhesive in Building 2 x 1.50/square foot = \$7,500.00
 - 400 linear feet of white HVAC insulation in Building 3 x \$4.50/linear foot = \$1,800.00
 - 6,000 square feet of cream texture in Building 3 x \$4.50/square foot = \$27,000.00
 - 6,000 square feet of green floor tile & black mastic in Building 3 x \$3/square foot = \$18,000.00

- 6,000 square feet of dark brown floor tile in Building 3 x \$1.50/square foot = \$9,000.00
- 6,000 square feet of brown mastic in Building 3 x \$1.50/square foot = \$9,000.00
- 13,000 linear feet of HVAC insulation (PACM) x \$4.50/linear foot = \$58,500.00
- Air monitoring during abatement activities:
 - \$750/day x 30 days = \$22,500.00

3.1.3 Alternative 3 – Removal of All Identified and Presumed ACM for Building Demolition

This option would include removal of all identified and presumed asbestos containing materials for the purpose of demolishing the building. All ACM must be removed prior to demolition due to the fact that demolition activities will make ACM friable.

This activity would be considered Class II work by OSHA (29 CFR 1926.1101) and requires worker and supervisor asbestos training. An OSHA Competent Person must be on site during abatement to ensure proper engineering controls and work practices are utilized and to recognize suspect ACM. The abatement debris must be disposed of in a landfill that accepts non-friable asbestos containing materials. NESHAP also requires a ten working day notification to the LDEQ prior to the start date of an abatement project.

Alternative 3 would be highly effective in achieving the goal of reduction of potential exposures to asbestos for individuals operating in adjoining businesses and would be helpful in selling and redeveloping (through new construction) the subject property for uses other than industrial. Alternative 3 would be resilient and would eliminate offsite migration concerns in the event of extreme weather. Preliminary costs for this Alternative are estimated to be **\$910,700.00** assuming 2 floors that are similar in nature (details provided below). **Please note that cost estimates are based only on first floor results only and should not be used for bid purposes.**

- Plans & specifications and bid specifications preparation = \$15,000.00
- Asbestos abatement activities (first floor only) = \$156,600.00 (detailed below):
 - 3,600 square feet of red floor tile in Building 1 covered alley x \$3/square foot = \$10,800.00
 - 4,500 square feet of brown floor tile & black mastic in Building 2 x \$3/square foot = \$13,500.00

- 500 square feet of green sheet flooring & yellow mastic in Building 2 x \$3/square foot = \$1,500.00
- 5,000 square feet of adhesive in Building 2 x 1.50/square foot = \$7,500.00
- 400 linear feet of white HVAC insulation in Building 3 x \$4.50/linear foot = \$1,800.00
- 6,000 square feet of cream texture in Building 3 x \$4.50/square foot = \$27,000.00
- 6,000 square feet of green floor tile & black mastic in Building 3 x \$3/square foot = \$18,000.00
- 6,000 square feet of dark brown floor tile in Building 3 x \$1.50/square foot = \$9,000.00
- 6,000 square feet of brown mastic in Building 3 x \$1.50/square foot = \$9,000.00
- 13,000 linear feet of HVAC insulation (PACM) x \$4.50/linear foot = \$58,500.00
- Air monitoring during abatement activities:
 - \$750/day x 30 days = \$22,500.00
- Demolition and recycling of materials (building covers approximately 112,000 square feet) at \$4 - \$6/square foot:
 - \$448,000.00 to \$672,000.00 ~ \$560,000.00

4.0 RECOMMENDATIONS

Based on this preliminary analysis, PPM makes the following recommendations regarding each Alternative:

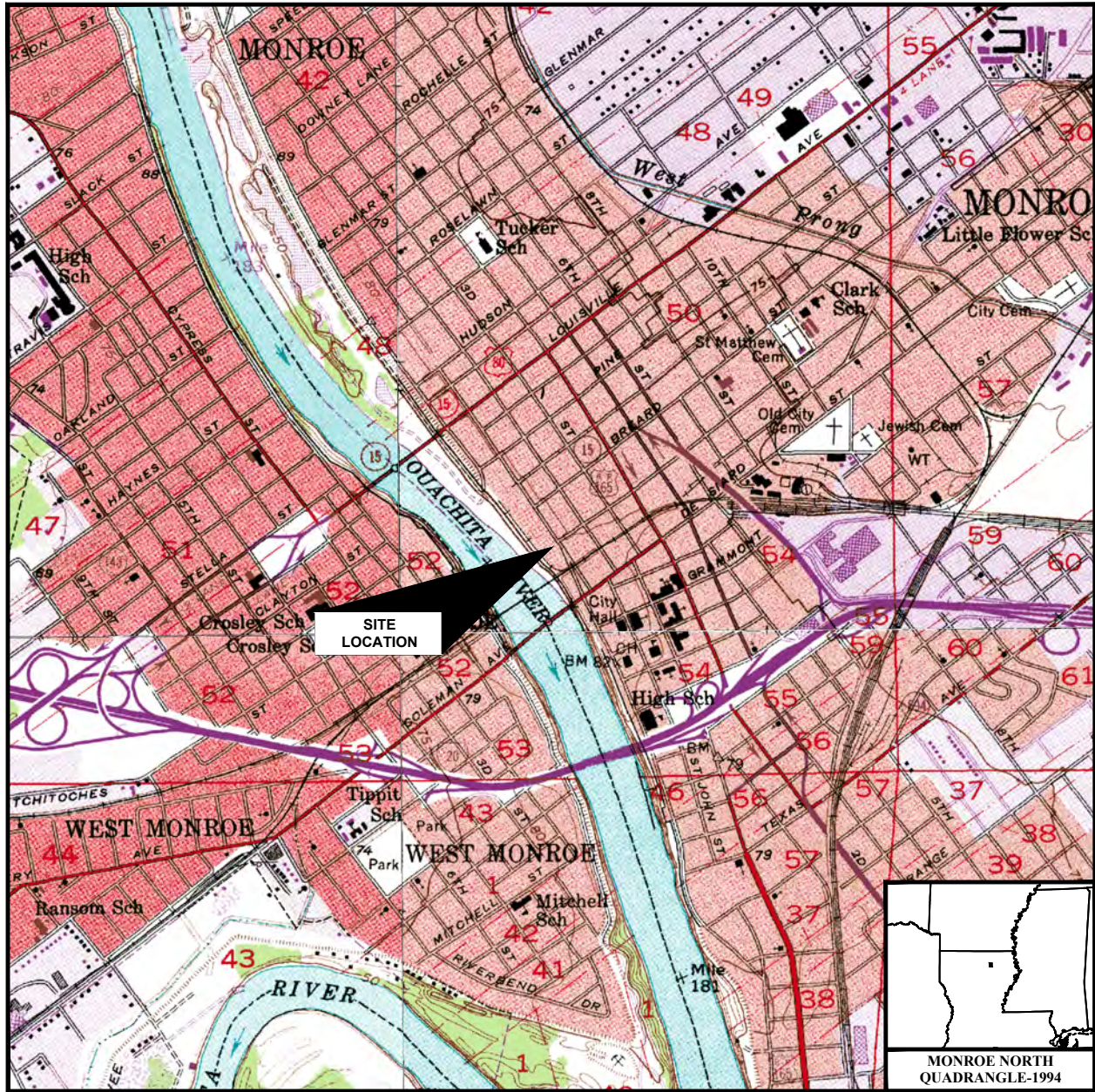
- **Alternative 1 – No Action and Building Left Intact**
 - The No-Action Alternative would not present additional costs but would also not benefit the surrounding community or provide progress for the City of Monroe’s goals of redevelopment and revitalization. Alternative 1 is not recommended.
- **Alternative 2 – Removal of All Identified ACM and Presumed ACM for Building Renovation**
 - Estimated Cost ~ \$350,700.00
 - The Ouachita Candy Company site is a unique facility due to its historical significance, which make it an ideal option for commercial development. While

asbestos abatement costs are not minimal, removing asbestos from the building will make the facility more attractive to new commercial business because the facility can be customized and renovated as needed without fear of asbestos exposure or up-front abatement costs by the buyer or operator. If it is decided that the existing buildings remain and are renovated or if the buildings cannot be demolished due to historical significance, then Alternative 2 is recommended.

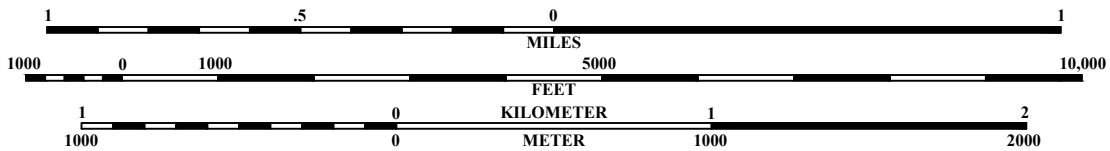
- **Alternative 3 – Removal of All Identified ACM and Presumed ACM for Building Demolition**
 - Estimated Cost ~ \$910,700.00
 - The Ouachita Candy Company site is in a prime location and would be ideal for a commercial redevelopment. With the exception of the detected ACM in the building, the relatively insignificant contamination identified in the Phase II ESA should not be a deterrent to a developer. If a structural engineer determines that there are health and safety or structural integrity concerns and if demolition is allowed given the property’s historic preservation designation, then Alternative 3 is recommended.


APPENDICES

APPENDIX A – FIGURES



SCALE: 1 : 24,000



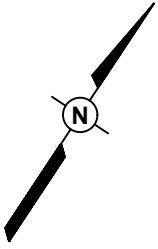
 PPM CONSULTANTS, INC. www.ppmco.com	
DRAWN BY: JCP	DRAWN DATE: 07/09/21
PROJECT NUMBER: 11472001	PHASE: ESA2

CITY OF MONROE
FORMER OUACHITA CANDY COMPANY
 211 - 305 WALNUT STREET
 MONROE, LOUISIANA

SITE LOCATION MAP

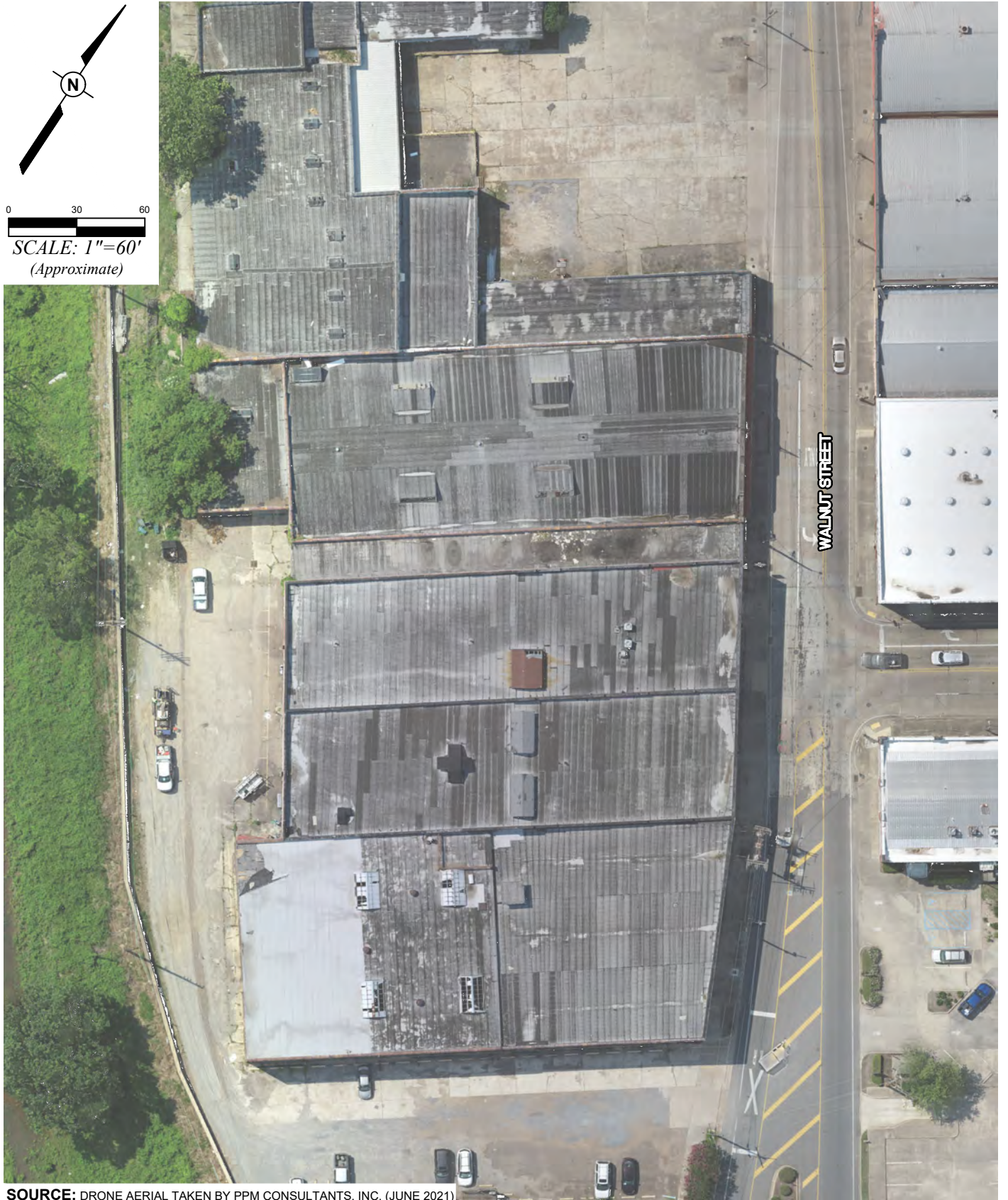
FIGURE NUMBER

1



0 30 60

SCALE: 1"=60'
(Approximate)



SOURCE: DRONE AERIAL TAKEN BY PPM CONSULTANTS, INC. (JUNE 2021)



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DRAWN BY:

JCP

DRAWN DATE:

07/08/21

PROJECT NUMBER:

11472001

PHASE:

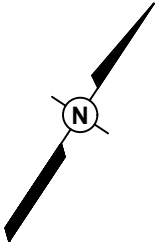
ESA2

CITY OF MONROE
FORMER
OUACHITA CANDY COMPANY
211 - 305 WALNUT STREET
MONROE, LOUISIANA

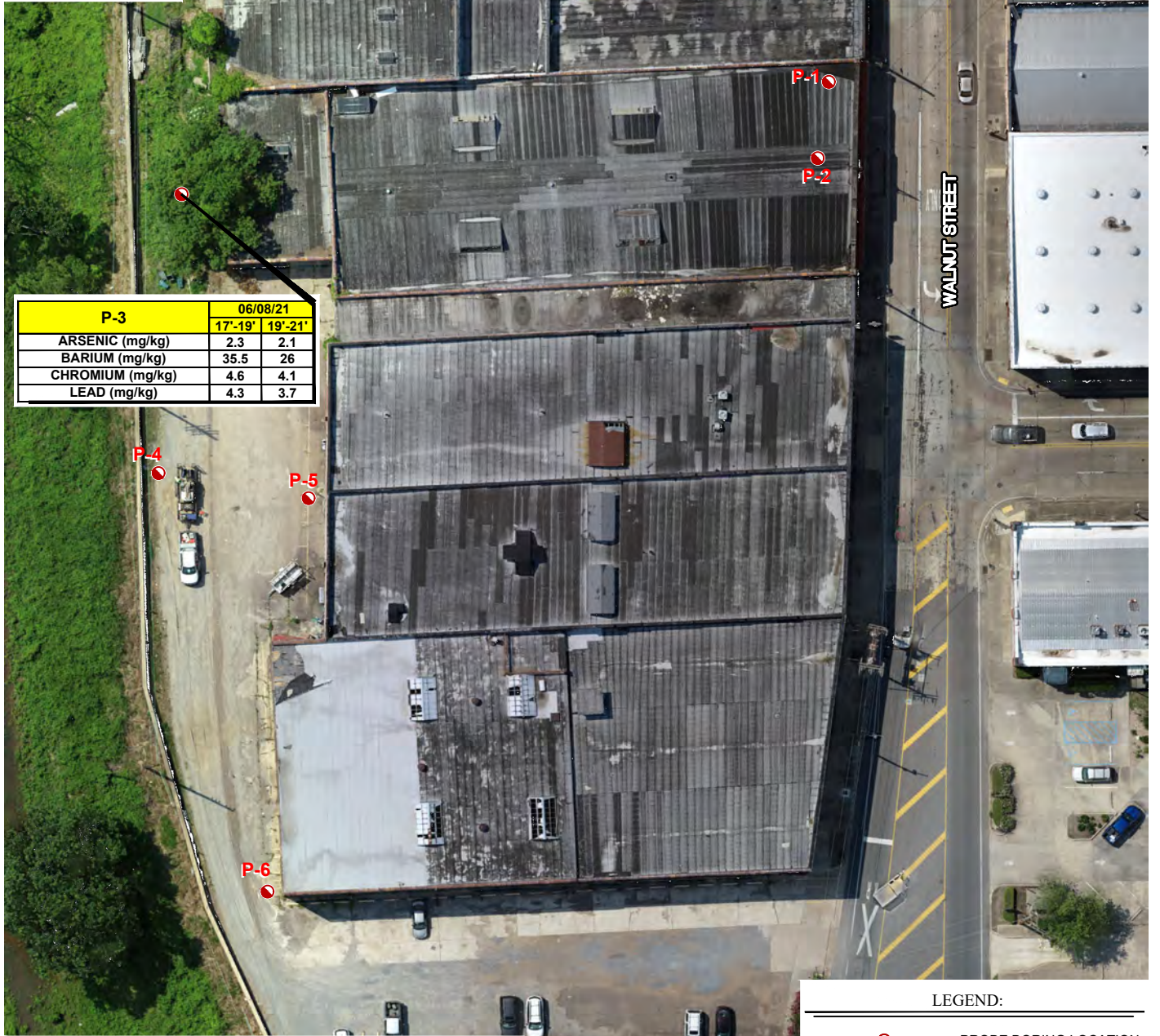
SITE MAP

FIGURE
NUMBER

2



0 30 60
SCALE: 1"=60'
 (Approximate)



P-3	06/08/21	
	17'-19'	19'-21'
ARSENIC (mg/kg)	2.3	2.1
BARIUM (mg/kg)	35.5	26
CHROMIUM (mg/kg)	4.6	4.1
LEAD (mg/kg)	4.3	3.7

LEGEND:



PROBE BORING LOCATION

SOURCE: DRONE AERIAL TAKEN BY PPM CONSULTANTS, INC. (JUNE 2021)

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 JCP

DRAWN DATE:
 07/08/21

PROJECT NUMBER:
 11472001

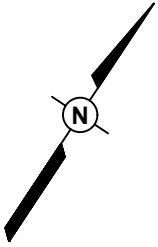
PHASE:
 ESA2

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 211 - 305 WALNUT STREET
 MONROE, LOUISIANA

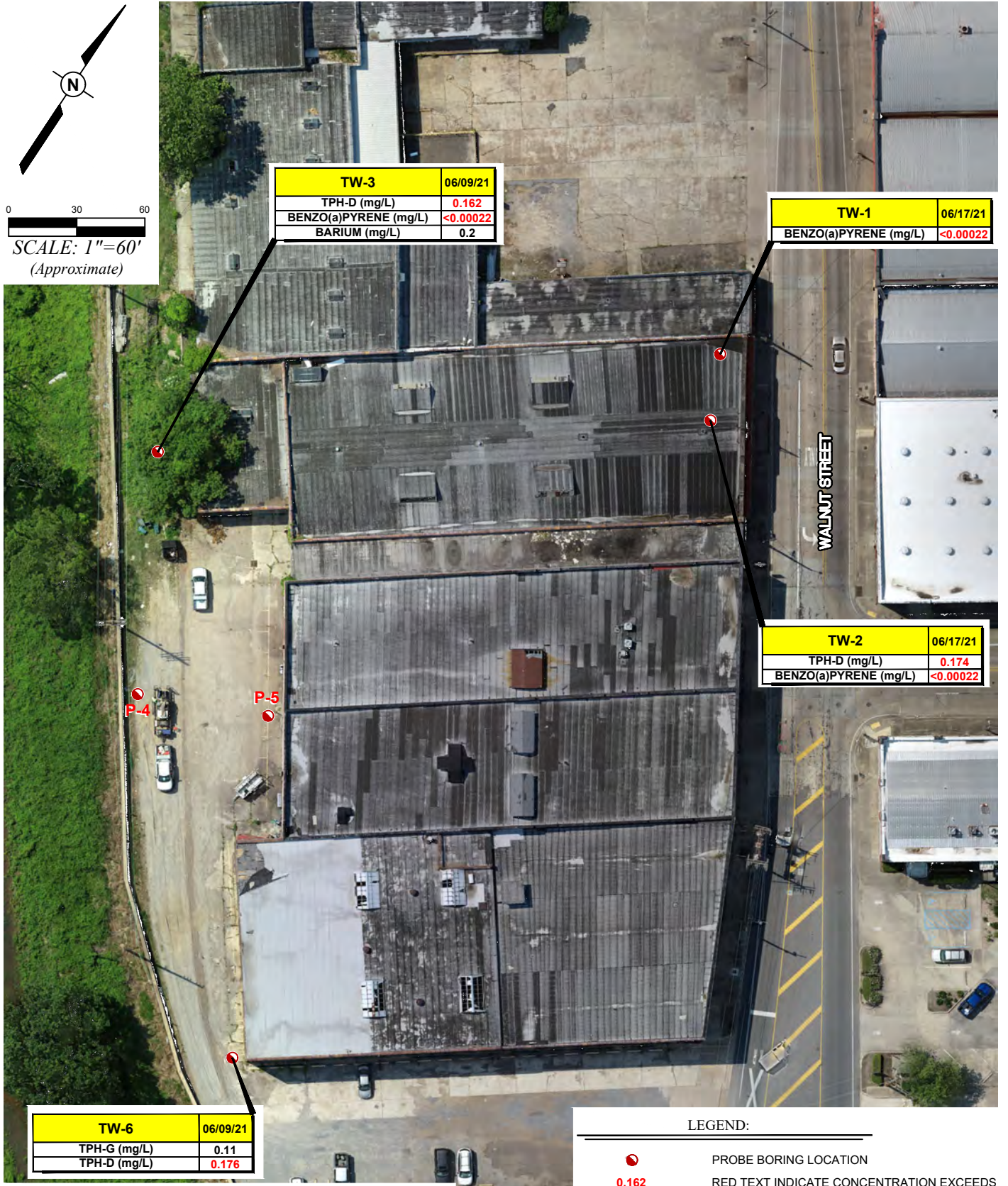
CONSTITUENT
CONCENTRATIONS IN
SOIL

FIGURE
 NUMBER

3



0 30 60
 SCALE: 1"=60'
 (Approximate)



TW-3	06/09/21
TPH-D (mg/L)	0.162
BENZO(a)PYRENE (mg/L)	<0.00022
BARIUM (mg/L)	0.2

TW-1	06/17/21
BENZO(a)PYRENE (mg/L)	<0.00022

TW-2	06/17/21
TPH-D (mg/L)	0.174
BENZO(a)PYRENE (mg/L)	<0.00022

TW-6	06/09/21
TPH-G (mg/L)	0.11
TPH-D (mg/L)	0.176

LEGEND:



PROBE BORING LOCATION

RED TEXT INDICATE CONCENTRATION EXCEEDS THE RECAP SCREENING STANDARD

SOURCE: DRONE AERIAL TAKEN BY PPM CONSULTANTS, INC. (JUNE 2021)



PPM CONSULTANTS, INC.
 www.ppmco.com

DRAWN BY:

JCP

DRAWN DATE:

07/08/21

PROJECT NUMBER:

11472001

PHASE:

ESA2

CITY OF MONROE
FORMER
OUACHITA CANDY COMPANY
 211 - 305 WALNUT STREET
 MONROE, LOUISIANA

CONSTITUENT
CONCENTRATIONS IN
GROUNDWATER

FIGURE
 NUMBER

4

APPENDIX B – SITE PHOTOGRAPHS

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 1
Children's Museum storage on adjoining property to the north.



PHOTO 2
Children's Museum to the north.



PHOTO 3
Pole-mounted transformers along west side of Children's museum property to the north.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 4
Revival Design and Cosign
on adjoining property to the east.

PHOTO 5
Monroe Chamber of Commerce and Ouachita Neurosurgery Center on adjoining property to the east.



PHOTO 6
Parking lot on adjoining property to the east.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 7
Pole-mounted electric transformers on the east side of the subject property.

PHOTO 8
Miro's Restaurant and parking lot on the adjoining property to the south.



PHOTO 9
Western boundary of the subject property and Ouachita River on the adjoining property to the west.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 10
Eastern side of the subject
property facing to the north.



PHOTO 11
Eastern side of the subject
property facing to the south.



PHOTO 12
West side of the sub-
ject property facing
north along former rail-
way.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 13
Solid waste drums on the west side of the subject property.

PHOTO 14
Approximately location of former used oil UST pit.



PHOTO 15
Drain on west side of the subject property.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 16
Solid waste dumpster on the west side of the subject property.

PHOTO 17
Northwestern portion of the subject property.



PHOTO 18
Drains in floor of storage area.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 19
Storage area interior.

PHOTO 20
Ground floor restroom.



PHOTO 21
Storage area.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 22
Scarring in concrete of stor-
age area.

PHOTO 23
Pitting in concrete in the stor-
age area.



PHOTO 24
Second story storage.



**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 25
Storage in interior of the former bottling factory.

PHOTO 26
Conveyor belt in former bottling factory.



PHOTO 27
Water filtration and floor drain in bottling factory.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 28
Cable operated freight elevator.

PHOTO 29
Cement flooring beneath elevator.



PHOTO 30
Storm drain interior to building.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 31
Duct insulation in former
bottling plant.

PHOTO 32
Ceiling tile sample.



PHOTO 33
Floor tile sample.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 34
Floor linoleum flooring and
paint in common area.

PHOTO 35
Storage in front office.

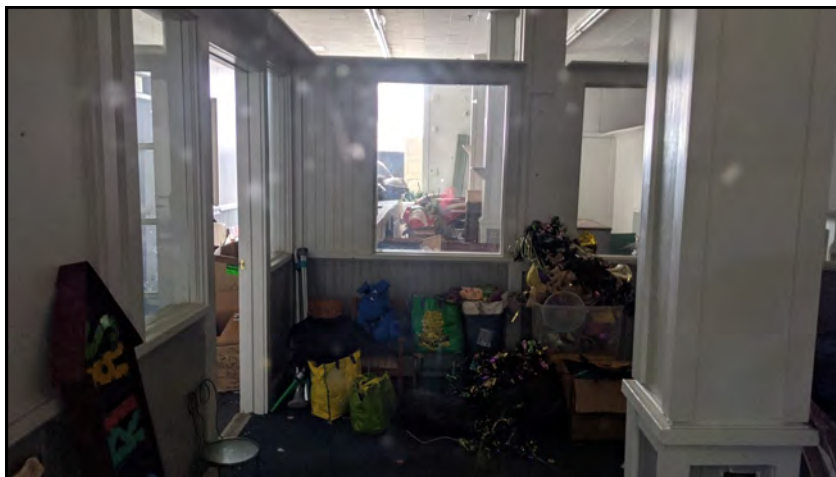


PHOTO 36
Passenger elevator.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 37
Bottling area on second floor.

PHOTO 38
Former production area on the second floor.



PHOTO 39
Chemical containers in storage.



**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 40
Chemical containers in storage.

PHOTO 41
Electrical panels.



PHOTO 42
Coca-Cola bottling ar-
ea.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 43
Heater unit in production area.



PHOTO 44
Cooling tower footings.

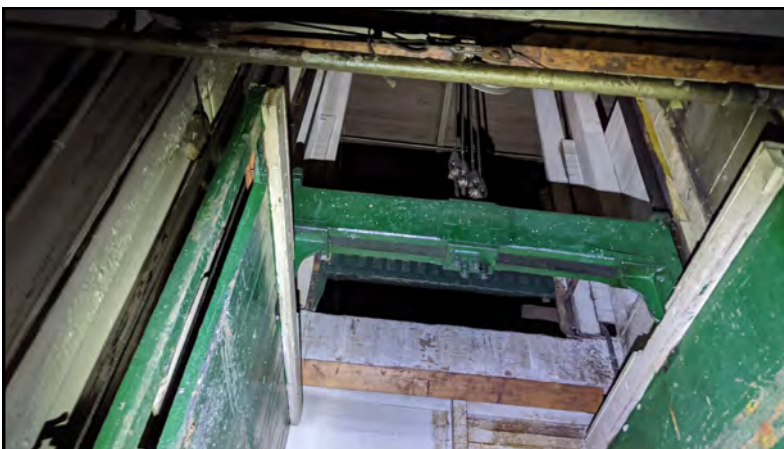


PHOTO 45
Second freight elevator.

**PHOTOGRAPHS
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA**



PHOTO 46
Flooring sample in hall.



PHOTO 47
Floor drain.



PHOTO 48
Office area.

**PPM PROJECT NO.
11472001/04.01ABCA**

Attachment 4

COMMUNITY NOTIFICATION NEWSPAPER EQUIVLENT AD (CITY OF MONROE WEBSITE)

COMMUNITY NOTIFICATION NEWSPAPER EQUIVLENT AD (CITY OF MONROE WEBSITE)

(note: Dated October 13, 2022)

The screenshot displays the City of Monroe website with a dark blue header and navigation menu. The main content area features a white background with a blue header for the announcement. The announcement is titled "City of Monroe Hosting FY 2023 EPA Brownfield Cleanup Grant Community Meeting" and is dated Thursday, October 27, 2022, from 5:30pm to 8:00pm. The text provides details about the meeting, including the location (400 Lee Joyner Memorial Expressway) and the purpose (to discuss the start-up of the grant and receive public input). It also lists the contact information for Michelle Martin, Media Relations Director, and provides a link to download a PDF of the announcement.

City Directory | Utility Payments | Electronic Billing Portal | MyGovernmentOnline
Party ready for the hour. Currenty 53°
SELECT LANGUAGE

HOME GOVERNMENT DEPARTMENTS & DIVISIONS BUSINESS & SERVICES CALENDAR

Home » City of Monroe Hosting FY 2023 EPA Brownfield Cleanup Grant Community Meeting

City of Monroe Hosting FY 2023 EPA Brownfield Cleanup Grant Community Meeting

Thursday, October 27, 2022 - 5:30pm

(Monroe, LA) The City of Monroe is submitting a FY 2023 Brownfield Cleanup Grant application to the U.S. Environmental Protection Agency (EPA) to obtain funds to abate and/or remediate hazardous waste sites within the former Calumet Candy Company, located at 251-257, 215, and 205 Walnut Street in District 4, zones of bulging ceilings, and remediate impacted jobs seeking community input on the draft cleanup grant application.

A copy of the start cleanup grant application, including the start-up Alternatives (ABCA), will be made available at the October 27th Community Meeting for public review and comment, and will also be made available for public review at the Executive Grant Writer's office in Monroe City Hall after the meeting.

Information concerning the city's ongoing FY 2021 EPA Brownfield Cleanup Assessment Grant will also be available at the Community Meeting.

Comments on the draft cleanup grant application will be accepted at the Community Meeting or by emailing Executive Grant Writer, Meghan Reinger, at meinger@citymonroe.la.us or by mail or hand delivery to Monroe City Hall, 400 Lee Joyner Memorial Expressway, Monroe, LA 71201.

Best,
Michelle Martin
Media Relations Director michellmartin@citymonroe.la.us
318.372.7640

Downloadable PDF

PDF
Security

10:41 AM
10/27/2022

Attachment 5

COMMUNITY NOTIFICATION NEWSPAPER EQUIVLENT AD (SOCIAL MEDIA)

COMMUNITY NOTIFICATION NEWSPAPER EQUIVLENT AD (SOCIAL MEDIA)

(note: Dated October 13, 2022)



Monroe City



Oct 13 · 🌐

The City of Monroe is submitting a FY 2023 Brownfields Cleanup Grant application to the U.S. Environmental Protection Agency (EPA) to obtain funds to abate asbestos-containing materials within the former Ouachita Candy Company, located... See more



The City of Monroe is submitting a FY 2023 Brownfields Cleanup Grant application to the U.S. Environmental Protection Agency (EPA) to obtain funds to abate asbestos-containing materials within the former Ouachita Candy Company, located at 205, 209, 215, and 305 Walnut Street in District 4, dispose of building debris, and remediate impacted soils. The City of Monroe will be hosting a Community Meeting in the Monroe Council Chambers, 400 Lea Joyner Memorial Expressway at 5:30 P.M. on Thursday, October 27, 2022, and is seeking community input on the draft cleanup grant application. A copy of the draft cleanup grant application, including the draft

Analysis of Brownfield Cleanup Alternatives (ABCA), will be made available at the October 27th Community Meeting for public review and comment, and will also be made available for public review at the Executive Grant Writer's office in Monroe City Hall after the meeting. Information concerning the city's ongoing FY 2021 EPA Brownfield Coalition Assessment Grant will also be available at the Community Meeting. Comments on the draft cleanup grant application will be accepted at the Community Meeting or by emailing Executive Grant Writer, Meghan Risinger, at

Meghan.risinger@ci.monroe.la.us or by mail or hand delivery to Monroe City Hall, 400 Lea Joyner Memorial Expressway, Monroe, LA 71201.



Attachment 6

SUMMARY OF COMMENTS RECIEVED

SUMMARY OF COMMENTS RECEIVED

1. An in-person public meeting was held on October 27, 2022, 5:30pm, at the Monroe City Council Chambers, located at 400 Lea Joyner Expressway, Monroe, LA 71201. The purpose of the meeting was to discuss and consider public comments prior to submittal of the City's US Environmental Protection Agency 2023 Cleanup Grant application. The subject property is the Ouachita Candy Company located at 211-305 Walnut St., Monroe, LA 71201. The draft application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) were printed and made available for public comment at the meeting. The grant application is due November 22, 2022. **No comments were received at the in-person meeting.**
2. After the meeting, the draft Cleanup Grant application and draft ABCA were also made available for review at the Executive Grant Writer's office in Monroe City Hall. Also, local media reported on the events of the October 27 public meeting, and on the City's plans to conduct cleanup work at the Ouachita Candy Company site and submit the grant application. They also reported that citizens were able to comment on the grant application until November 8, 2022 at 5:00pm. **No comments were received after the public meeting.**
3. There were no comments received on the draft Cleanup Grant Application and draft ABCA.

Attachment 7

APPLICANT'S RESPONSE TO PUBLIC COMMENTS

APPLICANT'S RESPONSE TO PUBLIC COMMENTS

1. An in-person public meeting was held on October 27, 2022, 5:30pm, at the Monroe City Council Chambers, located at 400 Lea Joyner Expressway, Monroe, LA 71201. The purpose of the meeting was to discuss and consider public comments prior to submittal of the City's US Environmental Protection Agency 2023 Cleanup Grant application. The subject property is the Ouachita Candy Company located at 211-305 Walnut St., Monroe, LA 71201. The draft application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) were printed and made available for public comment at the meeting. The grant application is due November 22, 2022. No comments were received at the in-person meeting.
2. After the meeting, the draft Cleanup Grant application and draft ABCA were also made available for review at the Executive Grant Writer's office in Monroe City Hall. Also, local media reported on the events of the October 27 public meeting, and on the City's plans to conduct cleanup work at the Ouachita Candy Company site and submit the grant application. They also reported that citizens were able to comment on the grant application until November 8, 2022 at 5:00pm. No comments were received after the public meeting.
3. There were no comments received on the draft Cleanup Grant Application and draft ABCA. **Since no comments were received, no responses were required.**

Attachment 8

MEETING SUMMARY FROM PUBLIC MEETING

MEETING SUMMARY FROM PUBLIC MEETING

1. An in-person public meeting was held on October 27, 2022, 5:30pm, at the Monroe City Council Chambers, located at 400 Lea Joyner Expressway, Monroe, LA 71201. The meeting location is an Americans with Disabilities Act (ADA)-compliant facility. No persons with limited English proficiency were in attendance.
2. The purpose of the meeting was to discuss and consider public comments prior to submittal of the City's US Environmental Protection Agency 2023 Cleanup Grant application. The subject property is the Ouachita Candy Company located at 211-305 Walnut St., Monroe, LA 71201. The draft application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) were printed and made available for public comment at the meeting. The grant application is due November 22, 2022.
3. Meeting participants included City representatives, members of local news media, and representatives of the local environmental professional company that wrote the draft ABCA. There were no comments received on the draft Cleanup Grant Application and draft ABCA.
4. No responses to comments were required since no comments were received.
5. After the meeting, the draft Cleanup Grant application and draft ABCA were also made available for review at the Executive Grant Writer's office in Monroe City Hall. Also, local media reported on the events of the October 27 public meeting, and on the City's plans to conduct cleanup work at the Ouachita Candy Company site and submit the grant application. They also reported that citizens were able to comment on the grant application until November 8, 2022 at 5:00pm. No comments were received after the public meeting. We are confident we have the full support of our community in the project.

Attachment 9

MEETING SIGN-IN SHEET

