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

PPM CONSULTANTS

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AT

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

PREPARED FOR:

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

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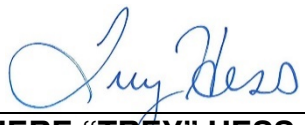

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1.0 INTRODUCTION AND BACKGROUND

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/cm^2) 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-contract 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:

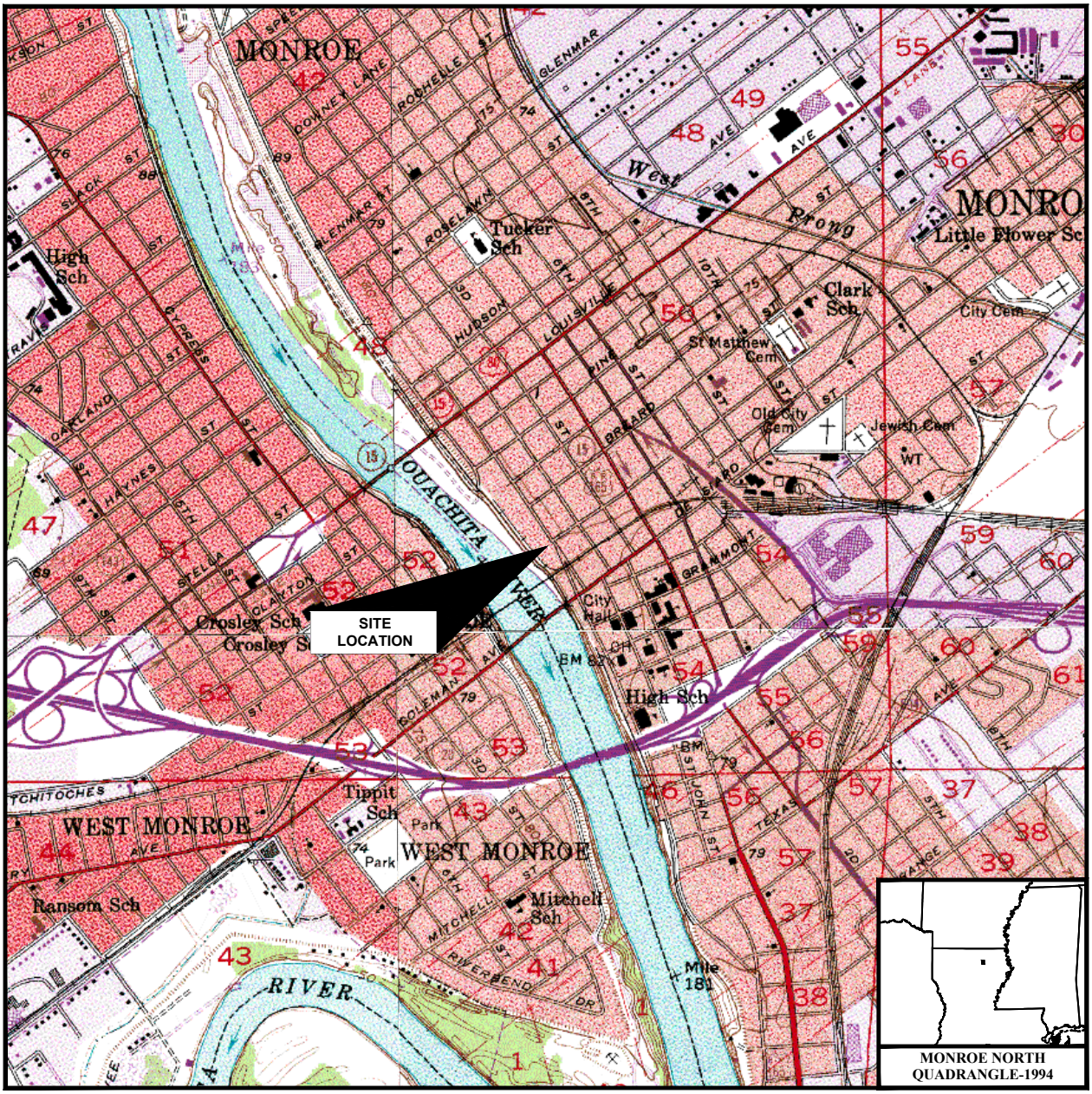
- **Alternative 1 – No Action and Building Left Intact**
  - The No-Action Alternative would not present additional costs but would also not benefit the surrounding community or provide progress for the City of Monroe's goals of redevelopment and revitalization. Alternative 1 is not recommended.
- **Alternative 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

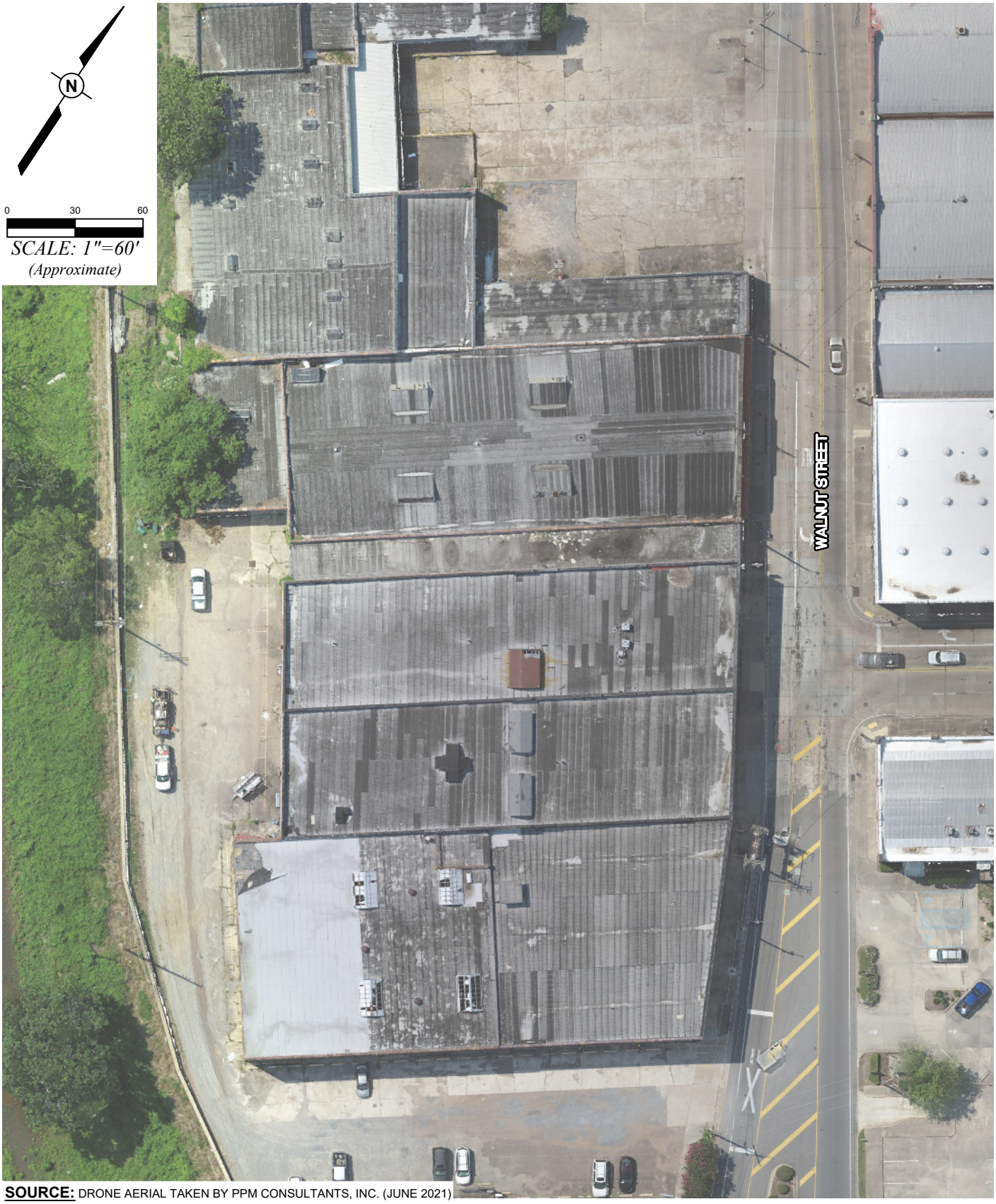
1 .5 0 1 MILES

1000 0 1000 5000 10,000 FEET

1 0 KILOMETER 1 2

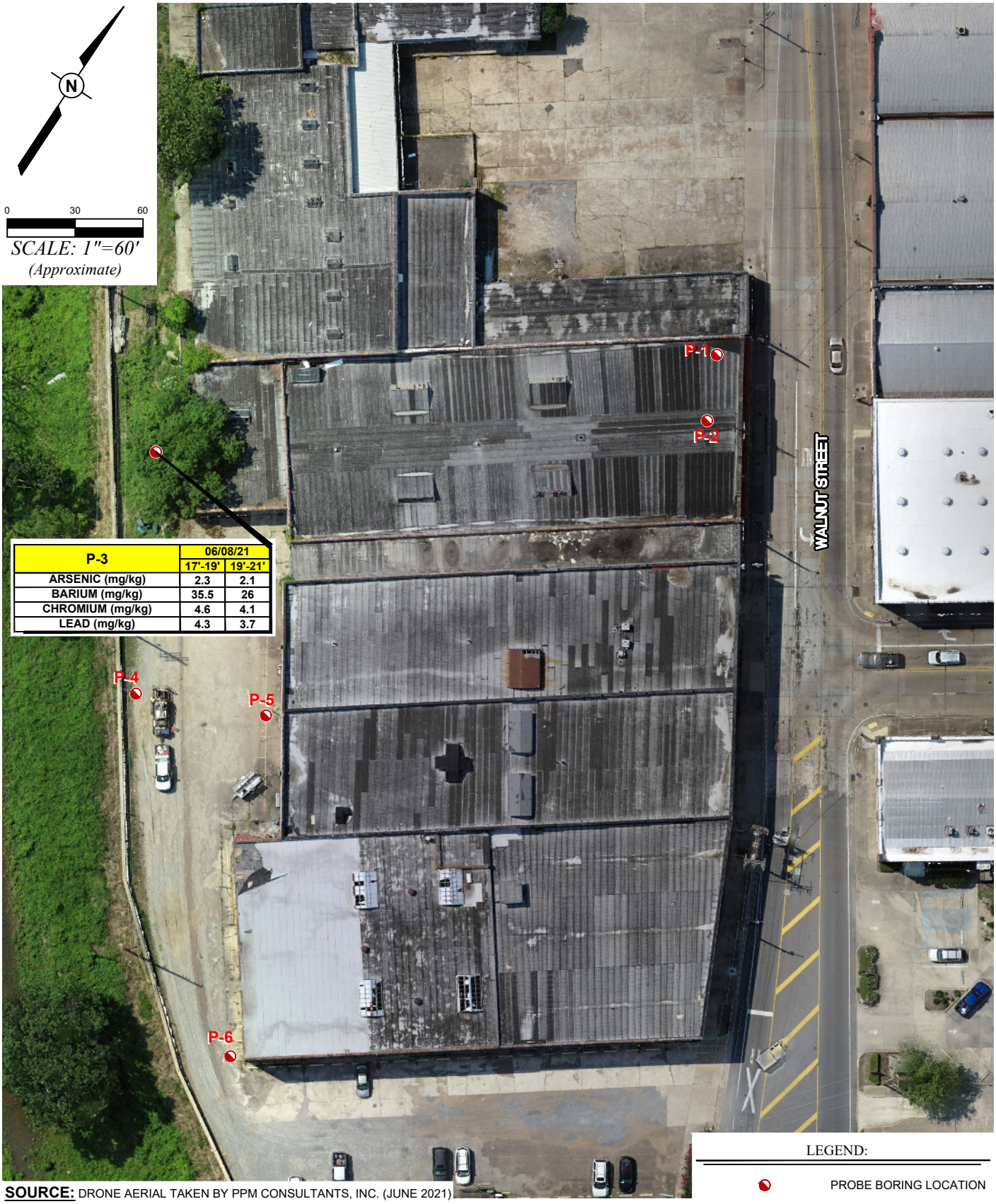
1000 0 METER 1000 2000

PPM CONSULTANTS, INC. www.ppmco.com		CITY OF MONROE **FORMER OUACHITA CANDY COMPANY** 211 - 305 WALNUT STREET MONROE, LOUISIANA	SITE LOCATION MAP	FIGURE NUMBER 1
DRAWN BY: JCP	DRAWN DATE: 07/09/21			
PROJECT NUMBER: 11472001	PHASE: ESA2			



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

PPM CONSULTANTS, INC. www.ppmco.com		CITY OF MONROE **FORMER OUACHITA CANDY COMPANY** 211 - 305 WALNUT STREET MONROE, LOUISIANA	SITE MAP
DRAWN BY: JCP	DRAWN DATE: 07/08/21		FIGURE NUMBER 2
PROJECT NUMBER: 11472001	PHASE: ESA2		



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

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

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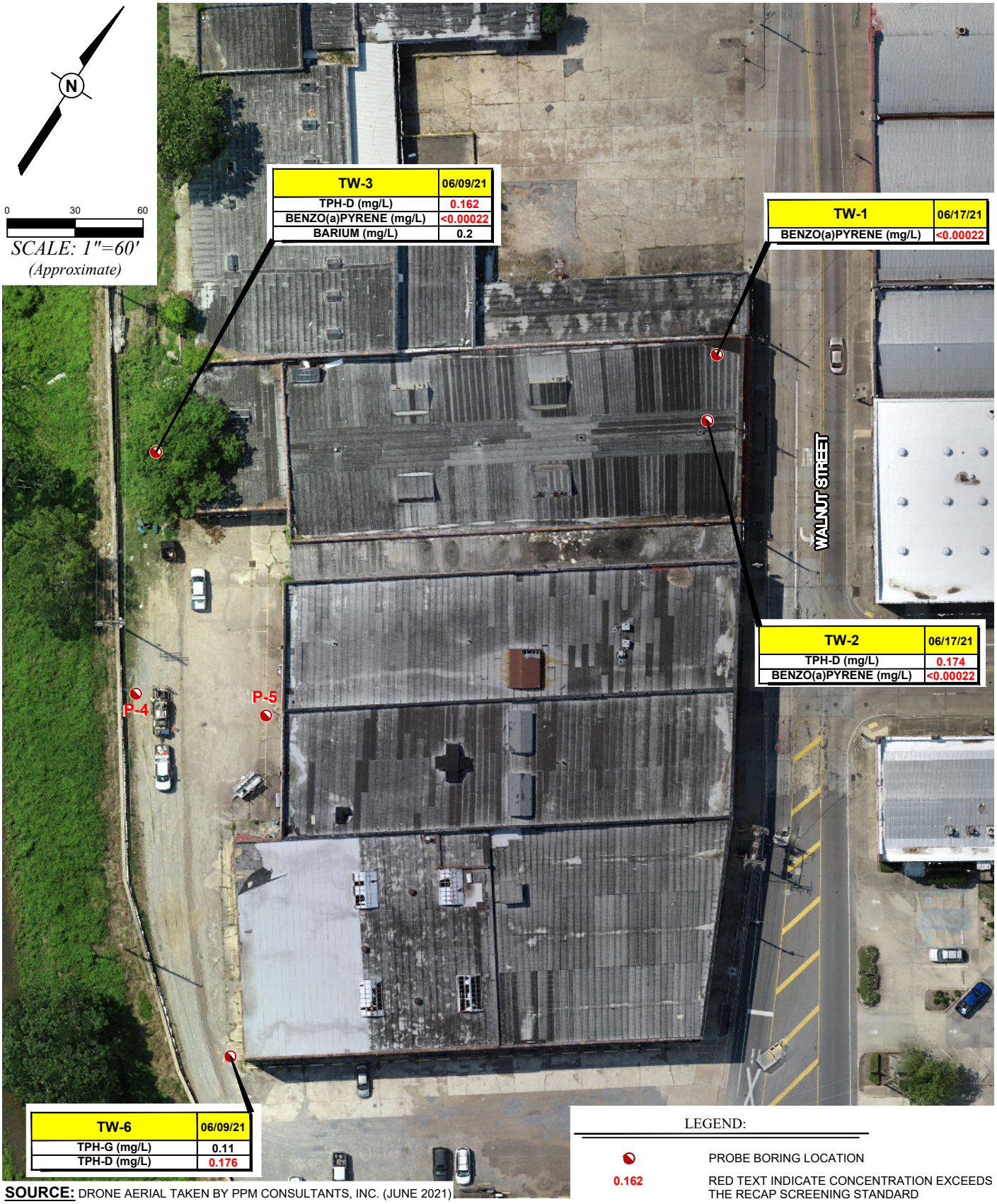
DRAWN BY:	DRAWN DATE:
JCP	07/08/21
PROJECT NUMBER:	PHASE:
11472001	ESA2

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

CONSTITUENT CONCENTRATIONS IN SOIL

FIGURE NUMBER
3



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

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DRAWN BY:	DRAWN DATE:
JCP	07/08/21
PROJECT NUMBER:	PHASE:
11472001	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.

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11472001/04.01ABCA

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.

PPM PROJECT NO.
11472001/04.01ABCA

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.

PPM PROJECT NO.
11472001/04.01ABCA

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 subject property facing north along former railway.

PPM PROJECT NO.
11472001/04.01ABCA

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 pro-eprty.

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 storage area.

PHOTO 23
Pitting in concrete in the storage 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.

PPM PROJECT NO.
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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.

PPM PROJECT NO.
11472001/04.01ABCA

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 area.

PPM PROJECT NO.
11472001/04.01ABCA

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.