



Community Development Department
Community Services Division
625 Murray Street, Alexandria, LA 71301
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cda@cityofalex.com

1. Applicant Identification

City of Alexandria
625 Murray Street
Alexandria, LA 71301

2. Funding Requested

- a. Assessment Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$TBD

3. Location

a) City of Alexandria b) Rapides Parish County c) Louisiana

4. Property Information

Former Rush's Cleaners Site – 210 Bolton Ave. Alexandria, LA 71301

5. Contacts

a. Project Director

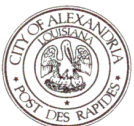
Shirley Branham, CBO, Assoc. AIA
Community Development Administrator
(318) 449-5070
Shirley.Branham@cityofalex.com
625 Murray Street, Suite 7
Alexandria, Louisiana 71301

b. Chief Executive/Highest Ranking Elected Official

Jacques Roy, Mayor
(318) 449-5002
Jacques.roy@cityofalex.com
PO Box 71
Alexandria, Louisiana 71309

6. Population

City of Alexandria, LA: 45,736(US Census: 2017-2021 American Community Survey)



Jacques M. Roy,
Mayor



7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	NA
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The proposed brownfield site(s) is impacted by mine-scarred land.	NA
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.	NA
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) 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).	NA
The proposed site(s) is in a federally designated flood plain.	NA
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	5
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	8
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Releasing Copies of Applications

Not Applicable.



Jacques M. Roy,
 Mayor

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of

Target Area: The City of Alexandria (City) founded in 1805 steadily grew through the 19th and 20th centuries. Due to its strategic geographic location, Alexandria quickly became a center of transportation, trading, and agriculture. With access to the most northward all-season navigable portion of the Red River at that time, the City was an important transportation hub and developed a riverside dock and warehouse infrastructure to accommodate the cargoes shipped upriver to be transported further by land. Alexandria, located amid massive native forest lands primarily of longleaf pine, was known locally as the “sawmill capital of the world” with over 75 sawmills located within 40 miles of the city. The City prospered immensely with this industry, and even more so when the railroads arrived at the turn of the 20th century. The rail lines connected Alexandria to various locations in Louisiana, Arkansas, and Texas, sparked further prosperous growth in the timber and agricultural industries, and later supported refineries, chemical plants, and manufacturing facilities that once thrived in the area. With an economy built on timber and agriculture, the City has struggled to meet the transformations brought about by globalization. As a result, Alexandria has experienced a decline in businesses, jobs, and residents over the past three decades, and now is struggling to meet residents’ needs.

With the success of the **community-driven 2021 Brownfields Revitalization Master (BFRM) Plan (BFRM)**, created during the FY20 assessment grant project, the **residents** identified three additional census tracts to focus the City’s brownfield efforts. The **geographic boundary** for this application is the city limits, with a focus on a **target area including Census Tract (CT) 139: Original Town and CTs 120, 121, and 122: BLA District**. The BLA District includes the brownfield areas identified through the community led **BFRM Plan** for **Bolton Ave, Lee Street, and Arial Drive**.

This target area is home to a large minority sensitive population (71% African American) who are living with economic and environmental justice difficulties such as high unemployment (15%), high poverty (34%), blighted and distressed neighborhoods, and high percent (26%) of the **households without a vehicle**. The City is working to transform the target area into a vibrant, walkable, transit-oriented community by promoting public and private investments that capitalize on existing plans to connect the underserved residents to employment, housing, and recreation. This Cleanup Grant will allow the **Former Rush’s Cleaners Site**, located along the City’s existing pedestrian trail system, to be transformed into a centrally located **Bolton Ave Mobility Hub** that will follow the redevelopment concepts found in the 2021 BFRM Plan. The Alexandria Transit (ATRANS) station has been located in downtown Alexandria since its inception and with the majority of the disadvantaged community living in areas further away from downtown, the need for the ATRANS station to be relocated to the target area is more pressing than ever.

ii. Description of the Proposed Brownfield Site(s): The cleanup site for this application is the **Former Rush’s Cleaners**, which sits on 1.0 acre of land located at 210 Bolton Avenue. The property hosted residential homes from 1914 through the 1950s when it was redeveloped as a drycleaner that utilized perchloroethylene solvents and operated until approximately 2001. The facility was housed in a 12,350-square foot building with a 2,500-square foot addition constructed some years later. The property has sat vacant since 2001 and the buildings are in a state of blight and dilapidation. The City routinely has to resecure the building due to vandalism and vagrants; as there is no fence securing the site, the windows are long since broken out and boarded up, and failed section of exterior wall has collapsed that has had a make-shift repair to prevent entry through the opening. As can be expected with a site along a commercial corridor in an urban

setting, a wide variety of schools, churches, parks, and gathering centers are within a mile of the site.

The Former Rush's Cleaners was assessed over a period of the past 10-12 years and included multiple assessments including 3 Phase I Environmental Site Assessments (ESA) and 3 Phase II ESA's. The assessments confirmed that asbestos was not present in the structures; however, very high concentrations of drycleaning chemicals including Tetrachloroethene, trichloroethene, and vinyl chloride were confirmed to be present in the groundwater and in soils up to 32 feet in depth. These carcinogens are particularly difficult to cleanup after time due to their density being greater than water; therefore the contaminants migrate deeper and deeper the longer no action is taken.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans
City leadership recognizes the critical importance to the community for relocation of the ATRANS station to the Former Rush's Cleaners site and its transformation into the Bolton Ave Mobility Hub. The **2021 Brownfields Revitalization Master (BFRM) Plan** created during the FY20 Assessment project addresses this vision and its beneficial impact to the disadvantaged community as well as surrounding brownfield sites located in the Original Town and BLA District. In addition to this brownfield-focused plan, the City has established the following plans that address this critically needed relocation of the public transit center and its benefits to further revitalize the target area: **2020-2025 Consolidated Plan** and **2020 City Revitalization Master Plan**.

The purpose of the 2020 City Revitalization Master Plan is to help preserve and protect the health, safety, and well-being of the public. This plan consists of seven key components focusing on removal of slum and blighted conditions, expropriation of vacant lots and deteriorated structures, development of affordable housing, improved community access to quality retail services, increased community-based business opportunities, neighborhood empowerment, and the rebuilding of community infrastructure. This Plan lays the foundation to develop and redevelop target-area strategic sites and buildings. The 2021 BFRM Plan was created as a series of ideas that can be deployed over time and opportunities for the private sector to cooperate with the City to create physical improvements and enhance economic viability by capturing additional sales while eliminating environmental concerns and blight.

By relocated ATRANS station to the Former Rush's Cleaners site and transforming into the Bolton Ave Mobility Hub, the transit hub will be centrally located within the City, does not require rerouting of existing transit routes, and provides opportunities for first-mile/last-mile connections via pedestrian and bicycle routes or car-sharing programs. Additionally, the new hub is within a 5-minute bicycle ride to the City's existing trail system that lead to Downtown, park amenities, healthcare, additional residential neighborhoods and other brownfields sites being assessed and planned for redevelopment. The Bolton Ave Mobility Hub is located where 26% of households do not have access to a vehicle. The relocation of the ATRANS station will also provide the City with a unique opportunity to develop the historic structure as an iconic downtown feature along the Red River. The master plan for the Bolton Ave Mobility Hub includes an extension of Madison Street from Bolton Avenue that provides uninterrupted vehicular and pedestrian access into the site and provides economic vitality to the existing brownfield sites that could be remediated and redeveloped. Additional mobility hub improvements include bicycle share, electric vehicle charging stations, and ride-share hub.

The cleanup and redevelopment of the **Former Rush's Cleaners Site into the Bolton Ave Mobility Hub** aligns with the current and active planning components that the City is using in their revitalization efforts of the Target Area. Cleanup and redevelopment of this site will serve as a critical link to connect the large, disadvantaged community to new opportunities and bring

underused properties back into productive use, thereby increasing property values and tax revenues, while creating expanded mobility throughout the target area and beyond.

ii. Outcomes and Benefits of Reuse Strategy: Cleanup and reuse of this site is a vital component of the overall approach for revitalizing the target area. Due to the vacant, blighted, and dilapidated condition of the Former Rush's Cleaners site, there is no displacement of residents and/or businesses. In fact, just the opposite, vacant parcels of land and closed businesses adjoin 3 sides of the site and residential properties one street over have decreased in value partly due to the 22 years this contaminated property has sat in decay. Repurposing the site for the Bolton Ave Mobility Hub will serve as a catalyst for redevelopment along the evolving Bolton Avenue corridor and overall Original Town and BLA District. As part of the planned redevelopment, the City has already acquired the vacant, blighted properties adjoining the Former Rush's Cleaners Site, one of which is also a brownfield due to historic use. These properties, along with the site proposed for cleanup in this application, will provide the necessary footprint to allow for smooth uninterrupted vehicle and pedestrian access into the site while also allowing space for **Climate Adaptation and Resilience** elements such as bicycle share, electric vehicle charging stations, ride share hub, and space for safe and easy access to the City's existing trail system connection the hub to all census tracts in the Target Area (noneconomic benefit). The City will encourage this site and other target-area redevelopment spurred by this site's new use to use **energy efficient sources** and **renewable energy, such as solar**, as part of their redevelopment strategy. The City will also explore opportunity to convert its existing bus fleet to cleaner energy use such as natural gas or electric motors.

This redevelopment will lead to increased employment opportunities at community-serving establishments for approximately 50 people, due to the adjacent and partially vacant and underutilized commercial shopping center area being revitalized by the construction of the Bolton Ave Mobility Hub. The City will engage residents and business owners in the target area to focus the occupancy of businesses on tenants that the community identifies as complementary to their neighborhood. One such business already identified in the **Brownfields Revitalization Master (BFRM)** would be a smaller retail grocery store, as the BFRM identified known market leakage in grocery and identified this corridor as a **food desert**. Other likely employment opportunities will be open to community members with a range of educational and work experience, from the entry-level first-time employee. The connectivity the transportation hub will bring will allow an abundance in opportunity to large portion of the Target Area residents. This will also encourage the community to live, play, shop, and work within walking or biking distance of their homes, with bicycle and affordable rideshare transportation services enhancing the availability of energy efficient and enjoyable transportation for any income level. Communities that come together to share their diversity are more likely to have youth who will be encouraged to graduate high school and go on to higher education. Property values in the area will increase (economic benefit) with improved walkability and access to existing trail system connecting major portions of the City. In turn, these types of outcomes will create a heightened sense of community and reduce crime rates, spurring further development of the trail system and leading to additional health benefits associated with more active lifestyles. Businesses will thrive in the area and people will be drawn to this active, walkable community and thus draw a greater tax base to the City (economic benefit).

c. Strategy for Leveraging Resources i. Resources Needed for Site Characterization: As part of previous site investigations under a prior Brownfields Assessment Grant and City General Funds, the overall extent and degree of contamination was sufficiently characterized to develop a Draft Analysis for Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach, from

which a Voluntary Remediation Program (VRP) Remedial Action Plan (RAP) will be formulated. At this time, the City does not anticipate needing more funding for further characterization of the Former Rush's Cleaners site and is ready to proceed directly into the cleanup phase.

ii. Resources Needed for Site Remediation: EPA Grant funding requested in this application will be sufficient to complete the remediation of the Former Rush's Cleaners Site. The City will spearhead the cleanup process and hire an environmental contractor to manage and implement remediation efforts. The cost of the cleanup required is \$TBD and does not fit into the City's limited available funding for site redevelopment. The partnership with the EPA will fulfill the City's goal of remediation and allow it to move on to the reuse phase of development.

iii. Resources Needed for Site Reuse: The City is currently using funding through the Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) for the **demolition and redevelopment of remediated brownfield sites and blighted structures** to help pave the way for future reuse. The Former Rush's Cleaners site, in its state of dilapidation, is a hazard to the community and has already been slated for demolition using these funds now that the City has obtained ownership of the property. This is important as the large footprint of the building will hinder site remediation.

Following the cleanup of the site, funds will be required to redevelop the site for the mobility hub. As reuse of the existing structures is not possible, new construction will be needed and the City estimates construction costs at approximately \$6 million. The City will be applying for federal and state Transportation grants and possible HUD CDBG entitlement grants to fund the site redevelopment. The site is also located in the BLA District, where the City is authorized to collect tax increment for the period 2012–2037. If utilized, the City will reinvest BLA District tax increment back into the area to encourage economic growth, support local businesses, and remove barriers to redeveloping environmentally contaminated properties. The funds will meet energy-efficient, electric, and climate-friendly standards to maintain high efficiency. New construction spurred by redevelopment of the Former Rush's Cleaners site that seeks City funds will also be required to meet these sustainable development standards. The City will work with the Central Louisiana Chamber of Commerce to ensure the **Opportunity Zone** and its tax incentives are being marketed to interested developers and investors to further redevelopment. The City also pursued and was awarded a second **EPA Brownfield Assessment Grant** to continue assessment activities in the target area, and LDEQ Brownfield Assessment funding for unique assessment needs. As a unit of local government, the City will continue to pursue state and federal grant funding as well as private-public partnerships.

iv. Use of Existing Infrastructure: The City intends to use existing target-area infrastructure (roads, power, water/sewer) as stated in its redevelopment plans. The City has already invested \$1.2 million in the Bolton Avenue corridor in 2013-2014 which the road was rehabilitated with brick pavers, turning lanes, bicycle lanes, sidewalks, and landscaping. As the site proposed for redevelopment as the mobility hub is located near the center of the City along a commercial corridor, existing infrastructure is sufficient for the proposed use. Should existing infrastructure needs arise, such as electrical requirements for electric vehicles or cleaner fuel source, such as natural gas, the City will look to state and federal funding sources to supplement the current budget allocation for repair, maintenance, and new installation of infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. **Community Need** i. The Community's Need for Funding: Encumbered by the current limits of its timber and agricultural economy in a global world, Alexandria is actively seeking stability, prospects, and a pathway toward growth. With only limited funding available as a result of its

reduced tax base, the City is making progress only slowly. The City is further burdened by the substantially growing need to remove severely blighted and dilapidated structures that represent a hazard to the community. The Original Town & BLA District Target Area is home to a community in need of revitalization. **The population of those residing in the target area is 9,647.**¹ Residents suffer from **low income as shown by the target area's average per capita income of \$22,749 and median household income of \$30,435**, which are significantly less than the national averages (\$37,368/\$69,021).¹ The percentage of all people below the poverty level in the target area is 34%, nearly four times the national average (9%).¹ To make matters worse, the target area has a much higher unemployment rate (15%) compared to national rates (5.5%).² As evidenced by these statistics, residents have been suffering from blight and a lack of industry for years. Currently, City funds are primarily used for basic services such as police, fire, and sanitation, with any target-area projects funded through several available bond options and grant awards. The City needs financial assistance to assess the target-area brownfields. Without the funding, sites would sit vacant and dilapidated with no hope of renewal. With the **low-income population** and a high unemployment rate, raising taxes to fund additional projects is impossible, but with the assistance of an EPA Brownfields Cleanup Grant will benefit the sensitive populations by enabling redevelopment of the site, which in turn will spur additional much-needed revitalization in the area.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: Within the target area the **sensitive population includes minorities and those living in poverty**. The target area has a high percentage of African Americans (71%), nearly **six times higher** than the national average (13%).² Other sensitive populations include **all people living below the poverty level at 34% and those under the age of 18 living below the poverty level at 47%**, significantly higher than national averages (13%, 17%).²

The redevelopment of the Former Rush's Cleaners will address **welfare issues** plaguing the city such as a lack of transportation and better access to affordable housing options. Within the target area **26% of households do not have access to a vehicle** (US 8%), making walkability and increased transportation options an extremely important part of residents' daily lives.² Exacerbating this issue is the target area being located in a **USDA Food Desert**. As part of the 2021 **BFRM Plan**, the City has an existing trail system that connects Downtown to the Red River, Bayou Rapides, park amenities, healthcare, residential neighborhoods, and potential brownfield sites. The redevelopment at the Former Rush's Cleaners Site into the Bolton Ave Mobility Hub will allow for the four miles of existing pathways to connect the majority of the target area. The Hub redevelopment is within a five-minute bicycle ride along this greenway to Downtown and the Red River, allowing residents to pursue additional job options throughout the city. **Affordable housing is greatly needed within the target area**. The target area's average monthly rent is \$700 (US \$1,096), with the average median value of a home at \$92,050 (US \$229,800).² Even with the low cost of monthly rent and low home values, the community is suffering as a significant portion of their annual income goes to cover housing. According to the Climate and Economic Justice Screening Tool, the target area is in the **92nd percentile of low-income households spending more than 30% of their income on housing**. To make matters worse, existing housing within the target area is aged and falling apart, with 73% of all homes being constructed prior to 1959, creating an environmental concern of asbestos and lead.² The Environmental Justice (EJ) Screen Report **Lead Paint indicator** shows the target area is in the **95th percentile** in the state. The redevelopment of the **Former Rush's Cleaners** site into the **Bolton Ave Mobility Hub** will not

¹ US Census: 2017–2021 American Community Survey

² US Census: 2017–2021 American Community Survey

only address mobility issues, access to fresh foods and jobs, and affordable housing options, but it will also create an environment that will promote healthier lifestyle changes for generations to come.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Sensitive populations are the most at risk when it comes to disease and health conditions that can arise from brownfield sites. Lead paint and asbestos exposure typically associated with aging structures pose increased risks to sensitive populations, especially for the target area's African American and children-living-in-poverty residents. The EJ Screen Report shows the target area ranks in the **95th percentile in the state and 96th percentile in the EPA Region for lead paint indicator** and the **80–90th percentile in the US for cancer risks**. Lead exposure can result in severe health and developmental consequences in **infants and children**, and asbestos exposure can result in many forms of **cancer** and breathing problems such as **asthma**.

The EJ Screen Report shows the target area is in the **80–90th percentile for Respiratory Hazard and Diesel Particulate Matter** in the US and **85th percentile for traffic proximity** in the EPA Region, which compounds the health issues (cancer & asthma) associated with the priority brownfield sites and their potential contaminants. The Climate and Economic Justice Screening Tool shows the **weighted percent of people told they have asthma is in the 91st percentile in the target area**. Within Rapides Parish, **cancer** is the second leading cause of death (**target-area cancer data is not available**). The Parish rate (171.6) is much higher compared to the US (155.6), with lung cancer causing the most deaths at 49 per 100K (US 39 per 100K).³ In addition, the Parish percent of **low-weight births** is 11%, higher than the national average (8%).³ This is troubling considering the contaminants at the Former Rush's Cleaners are VOCs such as tetrachloroethene, trichloroethene, and benzene, all of which can **cause several different forms of cancer and health problems**. By performing this cleanup and removing these contaminants, residents will be safe from dangerous contaminants in their drinking water, soil, and air in their own community.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The derelict properties throughout the target area, such as the Former Rush's Cleaners, generate a ripple effect of negative consequences, including **decreased taxable revenue, decreased property values, and reduced ability to market properties for redevelopment**, and EJ issues such as **low income, high unemployment, substandard housing, lack of transportation options, and distressed neighborhoods** affect the underserved residents of the target area. The EPA Environmental Justice Screening Report shows the target area in the 79th percentile for the people of color population, 86th percentile for low income, and 90th for unemployment in the nation. **All four of the census tracts** included in the target area are **fully disadvantaged Justice 40 tracts** with a combined total of 16 categories listed.

Due to the negative environmental consequences caused by the plethora of abandoned and blighted properties located within the target area, the sensitive populations have not experienced the same economic growth and vitality as the rest of the City. This is evident by the target area's extremely low median household (\$30,435) income and the high unemployment rate (15%) and high poverty rates (34%).⁴ As the years go by, the negative environmental consequences have scared away potential investors, causing the blighted, dilapidated and vacant buildings to sit idle. The negative environmental consequences and threats will be reduced and, in some cases, reversed upon the identification, assessment, and remediation made possible by the EPA Brownfield Grant Program removing the unknowns and bringing new life and business opportunities to the area. The

³ 2019 Community Health Needs Assessment: <https://rapidesregional.com/util/pdf/2019/2019-Community-Health-Needs-Assessment-Report-a.pdf>

⁴ US Census: 2017-2021 American Community Survey

proposed reuse of Former Rush’s Cleaners as a mobility hub directly **addresses the EJ issue of lack of transportation options**, which is crucial to the Biden Administration’s Justice 40 Initiative. Addressing these EJ issues will set the stage for redevelopment, enabling new businesses to occupy revamped commercial spaces in a neighborhood with an improved standard of living. The proposed remediation and reuse of the site, as well as the vision for revitalization in the target area, will improve the health and well-being of the sensitive populations and remedy many of the environmental and socioeconomic justice issues affecting this underserved community.

(b) Advancing Environmental Justice: Cleanup of the Former Rush’s Cleaners and subsequent redevelopment as the Bolton Ave Mobility Hub, made possible by an **EPA Cleanup Grant**, will address mobility issues, but also of critical importance, provide the needed spark for access to fresh foods and jobs, affordable housing options, and create an environment that will promote healthier lifestyle changes for generations to come. The site is located within CT 22079012200 which is **disadvantaged according to CJEST**. Additionally, the site is located at the intersection of two additional CT’s that are part of the Target area and are also disadvantaged according to CJEST, as described in greater detail above.

The mobility hub will transform the target area by addressing the issue of being located within a **food desert**, while also giving residents better mobility to address issues of **low income and crime**. Redevelopment of the Former Rush’s Cleaners site will spur private investment dollars in the surrounding area for needed food-related businesses, medical clinics, and amenities in the heart of the community. **The site and adjoining parcels of land needed to create the Bolton Ave Mobility Hub have been vacant and dilapidated for decades and no existing residents or businesses will be displaced by the redevelopment.** As the area begins to revitalize as a result of the transportation hub development, the City will employ redevelopment strategies designed to mitigate and minimize any potential displacement. As with any redevelopments in an urban setting, the possibility of gentrification is a concern. The City will work closely with residents and businesses who have the potential to be displaced in the future to ensure their needs are being met to maintain the overall unique culture and character of the area. With Brownfield Grant funding and careful planning, communication, and coordination with the target-area community, redevelopment will create new jobs, make basic amenities more accessible, and open up more opportunities to more diverse transportation and connectivity opportunities; directly addressing many of the environmental justice issues addressed above which plague the city hence improving the lives of target-area residents.

b. Community Engagement i. Project Involvement & ii. Project Roles: The following project partners will assist in the EPA Brownfield Cleanup project through the process of cleanup of the Former Rush’s Cleaners and transformation into the Bolton Ave Mobility Hub. They will coordinate to achieve community outreach by sharing progress with area residents and updating the masterplans for the Target Area.

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
Central Louisiana Homeless Coalition 501c3	Joseph Buzzetta (318) 443-0500 x 100 josephb@cenlahomeless.org	Responsible for management, transitional housing, and support services for homeless population and will assist with community outreach .
Hope House 501c3	Sandy Ray (318) 487-2061 ceo@cenlahopehouse.org	Responsible for management, emergency shelter, transitional housing, and support services for battered women and children and will assist with community outreach and determining community needs of this sensitive population.

SafeAlex	James Woodley (318) 229-2633	City liaison to neighborhood and community groups and will assist with community outreach to educate school-aged children within the target area.
Chamber of Commerce 501c3	Deborah Randolph (318) 442-6671 info@cenlachamber.org	Works to open new businesses and assist business leaders in the community; liaison to state legislators and will assist with future reuse planning, as well as financial and fundraising assistance.

iii. Incorporating Community Input: The City understands informing and gathering public input is essential to furthering redevelopment initiatives within a community. The City announced, in the Town Talk (print and online) and their social media outlets in October 2023 their intent to apply for this Brownfield Cleanup Grant application to remediate the Former Rush’s Cleaners site with the intent to redevelop the site into the Bolton Ave Mobility Hub. The Community Involvement Plan created during the recently awarded FY23 Assessment Grant Project (CIP) will be updated to explain planned community engagement activities, project schedule, project background and key players and will be made available for review at the City’s Community Development office. The planned community meetings and engagement activities will be held within the identified target area. During these planned community meetings and events, the City will record through meeting minutes all target-area residents’ input and suggestions given on the brownfield cleanup project and will evaluate the information during the quarterly project team meetings. The City will respond to all comments after the quarterly meeting on their social media account, and if additional follow up is needed, the City will contact the individuals to discuss their comments further. If residents provide additional input for site reuse, the City will address the input in site redevelopment plans and the overall City’s Brownfield Program goals.

The City realizes using multiple forms of media to communicate information about the Brownfield Program will ensure a wide reach throughout the community. The City will provide staff from their Media Outreach Team to reach citizens via social media such as Facebook and Instagram. The City is also prepared to use the City’s website and local news programming to ensure all residents have the opportunity to connect and engage. In addition, City staff will provide project information during the regularly scheduled City meetings and community educational meetings.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: Based on the previous investigations, site soil and groundwater is contaminated with VOCs. To address the contamination in these media, a draft ABCA was developed for the site that evaluated multiple alternatives including a no-action alternative. With consideration of effectiveness, implementation feasibility, and relative costs, the recommended cleanup alternative includes soil removal, treatment of VOCs in soil and groundwater by chemical oxidation, and installation of a vapor mitigation system (VMS) to mitigate the potential for exposure to VOCs in the new building by sub-slab vapor intrusion. Remedial activities at the site will be overseen by LDEQ for regulatory oversight purposes, with oversight costs paid from grant funds. VOC-impacted soils will be removed in the highest impacted areas to a depth of 15 below ground surface (bgs). VOCs in soils beyond 15 bgs will be treated as needed by in-situ chemical oxidation using activated persulfate or another suitable oxidant, which will be directly applied in open excavations prior to backfilling and injected in the concentrated areas of impact. A VMS will be incorporated into the design of the new buildings. Dissolved VOCs in groundwater will be treated by in-situ chemical oxidation using activated persulfate or another suitable oxidant, which will be directly applied in open excavations prior to backfilling and injected downgradient from the excavations via direct-push methods. These actions will effectively eliminate the potential for

exposure to impacted soils, remove ongoing sources of impact to groundwater, treat residually impacted groundwater downgradient from the source removal areas, and allow construction of new buildings over the residual impacted areas while addressing the potential for vapor intrusion.

b. Description of Tasks/Activities and Outputs

Task 1: Outreach	
i.	<i>Project Implementation:</i> The City’s Brownfield Program Director will update the existing Community Involvement Plan (CIP), outreach materials, brownfield project website, and social media posts with the assistance of the environmental contractor (EC). City staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created within 3 months of award (upon completion a more concrete schedule will follow). Community Meetings held 2 nd , 6 th , & 10 th quarter. Website and Outreach Materials created in the 1 st quarter and posted monthly throughout the grant project.
iii.	<i>Task/Activity Lead:</i> City: Shirley Branham, Brownfield Program Director
iv.	<i>Outputs:</i> CIP, Brownfield Website, 3 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
Task 2: Programmatic Support	
i.	<i>Project Implementation:</i> The City will procure an EC to assist with the project. City’s Brownfields Program Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule and terms and conditions. The EC will assist the City in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The City staff have travel in an existing FY23-27 grant budget; therefore this budget allows for two staff to attend one national / regional / grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 st quarter & Quarterly Reporting begins in the 2 nd quarter and continues throughout the grant project. Yearly Reporting and Forms created in 5 th , 9 th , 13 th quarter and during final close out.
iii.	<i>Task/Activity Lead:</i> City: Shirley Branham, Administrator Brownfield Program Director
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend three conferences.
Task 3: Cleanup/Reuse Planning	
i.	<i>Project Implementation:</i> The City’s Brownfields Program Manager will oversee the EC as they finalize the ABCA, prepare QAPP and Health and Safety Plans (HASP), prepare final remedial action plan, and host visioning session.
ii.	<i>Anticipated Project Schedule:</i> Initiated upon award and funding of the grant 10/2024; QAPP and Final ABCA preparation 01/2025; Cleanup Plan approved by regulator 05/2025, Visioning Session conducted in 06/2025.
iii.	<i>Task/Activity Lead:</i> The EC will complete the technical aspects of the project with oversight from City: Mr. Keith Gremillion, Brownfield Program Manager
iv.	<i>Outputs:</i> 1 Final ABCA, 1 Cleanup Plan, 1 Site Specific-QAPP & HASP, 1 Visioning Session.
Task 4: Cleanup	
i.	<i>Project Implementation:</i> The City’s Brownfields Program Manager will oversee the EC as they manage the site cleanup activities including contractor mobilization, cleanup implementation, confirmation sampling, contractor oversight, cleanup reporting, final remedial action report, and EPA Closeout report.
ii.	<i>Anticipated Project Schedule:</i> Cleanup implementation 06/2025 through 12/2026, final remedial action report 04/2027; EPA Closeout Report 07/2027.
iii.	<i>Task/Activity Lead:</i> The EC will complete the technical aspects of the project with oversight from City: Mr. Keith Gremillion, Brownfield Program Manager

iv.	<i>Outputs:</i> 1 site ready for reuse, 4 remediation jobs created (annualized), 1 cleanup reports, 1 final remedial action report, 1 EPA Closeout report.
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c. Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.* The budget for this project includes travel, supplies, contractual, and construction costs only. **Task 1 Outreach:** Contractual: Update Community Involvement Plan \$1,500 (10hrs x \$150), Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$3,000 (20hrs x \$150), 6 Community Education Meetings \$1,500 each (10hrs x \$150) (\$7500 total). Supplies: Outreach Supplies (software, printouts, etc.) \$1,000. **Task 2 Programmatic Support:** Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$18,750 (125hrs x \$150). Travel: Two staff to attend one conferences \$3500 (flights at \$450/each, 3 nights/each in hotel at \$200/night, incidentals and per diem at \$600 x 2 attendees). **Task 3 Planning:** Contractual: 1 Final ABCA \$3,000, 1 Visioning Session \$3,500, QAPP, HASP, Permitting \$7,500 (50hrs x \$150). **Task 4 Cleanup:** Contractual: Vapor Mitigation System Design **\$30,000** (200 hrs x \$150). Groundwater treatment by in-situ chemical oxidation **\$537,500** in-situ remediation, design validation study \$30,000 (4 passive flux meters at \$3,000/each, 120 hrs x \$150). groundwater treatment by chemical oxidation (design and injection field implementation) \$130,000. chemicals (including delivery and sales tax) \$220,000. consultant oversight \$53,500 (428 hrs x \$125). Post-remediation groundwater and soil gas monitoring and reporting – 8 quarterly monitoring & reporting events at \$8,000 per monitoring event for a total of \$64,000 (60 groundwater samples at \$100/sample; 464 hrs x 125). Oversight and reporting \$40,000 (320 hrs x \$150). Construction: Regulatory Oversight **\$20,000** (200 hrs x \$100). Surficial Soil Removal **\$516,000:** contractor mobilization, soil excavation, transport, and disposal of fill soil \$487,500 (7500 tons at \$65/ton); consultant oversight \$12,500 (100 hrs x \$125), soil confirmation sampling and landfill laboratory analysis \$16,000 (40 at \$400/sample).

Category	Tasks				Totals
	<i>Outreach</i>	<i>Programmatic Support</i>	<i>Planning</i>	<i>Cleanup</i>	
Travel		\$3,500			\$3,500
Supplies	\$1,000				\$1,000
Contractual	\$12,000	\$18,750	\$14,000	\$537,500	\$582,250
Construction				\$536,000	\$536,000
Total Budget	\$13,000	\$22,250	\$14,000	\$1,073,500	\$1,122,750

d. Plan to Measure and Evaluate Environmental Progress and Results: To ensure this EPA Brownfield Grant is on schedule, the City’s internal Brownfields Team, which will include the environmental contractor, will meet quarterly to track all **outputs identified in 3.b** using an Excel spreadsheet. The Brownfield Program Director will report progress to the EPA via quarterly reports, and project expenditures and activities will be compared to the project schedule to ensure the project will be completed within the four-year time frame. Site information will be entered and tracked in the ACRES database. Outputs to be tracked include QAPP, ABCA, and cleanup plan development, contractor procurement, quarterly, annual, and closeout reports, and the number of community meetings. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently, countermeasures are in place to address the problem which include making

monthly calls to their EPA Project Officer and, if needed, creating an EPA Corrective Action Plan to get back on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Structure & ii. Description of Key Staff: The City of Alexandria's Community Development Department is tasked with undertaking economic development, redevelopment, and reinvestment initiatives and oversees Alexandria's Brownfield Program. In addition, the department oversees the Department of Housing and Urban Development (HUD), through Community Development Block Grants (CDGB), the HOME Investment Partnership Program (HOME), and the City's Demolition Program. The City's Community Development Administrator and **Brownfield Program Director, Ms. Shirley Branham**, will be responsible for the timely and successful expenditure of funds and completion of administrative and financial requirements of the project. **Mr. Keith Gremillion** serves as the Brownfield and Community Development Project Manager for the City's brownfield project team and will assist Ms. Branham with the administration of the City's Brownfield Program as the **Brownfield Program Manager**. They will be assisted by Mr. **David Johnson**, the City's Assistant **Finance Manager**, who will manage the ASAP drawn down funds and financials aspects of the grant.

Ms. Branham has a Bachelor of Architecture from Louisiana Tech University and has been employed with the City of Alexandria for over 14 years. During her time as Community Development Administrator, she has overseen many grant-funded programs, such as the US HUD, through CDGB and HOME. Ms. Branham revamped the City's demolition program to remove dilapidated structures for the health and safety of the neighborhood, stabilize neighboring property values, and lower fire and police calls in the area. Mr. Gremillion has been with the city for 5 years but has over 40 years of experience in construction management and serves as the Multi-Trades Inspector for the city. Mr. Gremillion performs field inspections on all projects, which are federally funded through HUD's CDBG and HOME programs. He is responsible for defining and approving scopes of work, then ensuring field compliance with all federal, state, and local codes and regulations for various types of construction projects, including demolition. Mr. Johnson has over 20 years of experience working in local government and is proficient in the city's accounting software, online banking service, accounting, payroll, and accounts payable reporting.

iii. Acquiring Additional Resources: Utilizing local contracting requirements and procurement process, the City will procure a qualified environmental contractor to assist with technical and reporting portions of the Brownfield Cleanup project, in addition to any other contractors needed to complete the cleanup. The City will ensure compliance with the EPA's "Professional Service" procurement process.

The City commonly procures contractors within the local area for a variety of construction services and has all systems in place to appropriately acquire any additional expertise and resources required to successfully complete the project.

b. Past Performance and Accomplishments i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments The City is the current recipient of a FY 2023-2027 community-wide assessment grant in the amount of \$500,000. In addition, the City has received the following three previous assessment grants: 2008 Assessment Grant for Hazardous Substances in the amount of \$200,000; 2009 Assessment Grant for Petroleum in the amount of \$200,000; and 2020 Assessment Grant in the amount of \$300,000. City staff assigned to oversee and manage the 2008 and 2009 grants are no longer employed by the City. Ms. Shirley Branham, the Brownfield Program Director, provided information that was to the best of her knowledge regarding the City's past Brownfield Grant performance. According to City records, a total of 10 Phase I Environmental

Site Assessments (ESAs) and 5 Phase II ESAs were conducted, and 5 Quality Assurance Project Plans (QAPPs) were prepared between February 2009 and September 2014. Staff with knowledge of any information submitted for the 2008 and 2009 grants via the EPA's Assessment, Cleanup, and Redevelopment Exchange System (ACRES) are not currently employed by the City. Ms. Branham's team has successfully handled all aspects of the FY20 grant. This Assessment Grant completed 5 Phase I ESAs, 3 Phase II ESAs with Site-Specific QAPPs in the Old Town target area, a Community Involvement Plan, three community meetings, brochures and outreach materials, and a Generic QAPP. In addition, the City used their funding to create a community-led Brownfield Revitalization Plan (EPA Approved Planning Documents) that has shaped the future reuse and redevelopment of brownfields throughout the target area and beyond, including the reuse of the Former Rush's Cleaners site. All outcomes/outputs have been recorded in the ACRES database. (2) Compliance with Grant Requirements For the 2008 & 2009 Assessment Grants, based on the Assessment Grant Work Plan (August 1, 2008, through September 30, 2011), the City outlined its objectives, budget, tasks, and overall quality assurance plan. In addition, the City also prepared a Quality Management Plan that clearly identified the team, manager responsibilities, organization, and other procedures to ensure that all activities under the grant program were completed with care and excellence. The current staff managed the FY20 grant as a very successful project. This grant was facilitated in strict conformance with the Work Plan and complied with required schedules implemented by the US EPA for on-time submittal of quarterly reports, ACRES reporting, and deliverable submittals. This grant successfully drew down to a zero-dollar balance and close-out documents are being prepared in October 2023.

The current open grant recently awarded to the City was started on October 1, 2023, with a project end date of September 30, 2027. The City was allowed a pre-award cost of the Phase 1 ESA and is currently working with their EPA Project Officer to finalize contractual and administrative documents for the cooperative agreement.

Threshold Criteria

1. Applicant Eligibility

- a. The City of Alexandria, Louisiana, is eligible to apply for the EPA Brownfields Cleanup Grant as a general-purpose unit of local government as defined under 2 CFR §200.64.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

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

4. Site Ownership

The City of Alexandria is the current owner of the property; having acquired the property on _____, 2023 through an Act of Donation and will retain ownership while the Brownfields Cleanup Grant funds are disbursed for cleanup and the property is repurposed for a transportation hub.

5. Basic Site Information

- a) Former Rush's Cleaners;
- b) 210 Bolton Avenue, Alexandria, Louisiana 71301

6. Status and History of Contamination at the Site

- a) The site is contaminated with hazardous substances.
- b) The 1.0-acre site at 210 Bolton Avenue hosted residential homes from 1914 through the 1950s when it was redeveloped as a drycleaner that operated until approximately 2001. The facility was housed in a 12,350-square-foot building with a 2,500-square foot addition constructed some years later. Perchloroethene, also known as Perchloroethylene or "PERC" is the drycleaning solvent used at the Former Rush's Cleaners for roughly 50 years. The property has sat vacant since 2001 and the buildings are in a state of disrepair.
- c) The site has soil and groundwater impacts in the form of volatile organic compounds (VOCs) that are above the State of Louisiana's Risk Evaluation Corrective Action Program (RECAP) Screening Standards. The Louisiana Department of Environmental Quality (LDEQ) developed the RECAP to address risks to human health and the environment posed by the release of chemical constituents to the environment. This is LDEQ's primary statutory mandate for remediation activities. It is clear in Louisiana's Environmental Quality Act that risk to human health and the environment must be evaluated in the remedial decision-making process.
- d) The site shows evidence that historical releases from the drycleaning operations occurred, likely from leaking equipment and associated piping and improper storage and disposal, such as pouring spent solvents down drains, which commonly failed and released to the environment due to the nature of the chemicals. The overall vertical and lateral extents of contamination have been generally identified, with the VOC-impacted soils occurring

primarily beneath the main building near where the equipment was formerly located and to the south and west of the building. The VOC-impacted groundwater occurs in the same general area.

7. Brownfields Site Definition

The City affirms that the site is:

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

8. Environmental Assessment Required for Cleanup Grant Applications

The following site assessment reports have been completed for the site at 210 Bolton Avenue:

- Phase I Environmental Site Assessment dated January 2011;
- Phase I Environmental Site Assessment dated July 2022;
- Phase I Environmental Site Assessment dated August 28, 2023;
- Phase II Environmental Site Assessment dated September 2011;
- Additional Phase II Environmental Site Assessment dated October 24, 2023;
- Analysis of Brownfield Cleanup Alternatives dated October 24, 2023.

9. Site Characterization

a. Not Applicable.

b. The Former Rush's Cleaners site at 210 Bolton Avenue is eligible to be enrolled in the State voluntary remediation program. A letter from the Louisiana Department of Environmental Quality is included in this application which:

- i. Affirms that the site is eligible to be enrolled in the state voluntary remediation program.
- ii. Indicates that the site is NOT intended to be enrolled in the state voluntary remediation program, but rather, will proceed with the State's equivalent oversight program *Risk Evaluation Corrective Action Program* (RECAP) designed specifically to regulate assessment and cleanup activities addressing risks to human health and the environment posed by the release of chemical constituents to the environment.
- iii. Indicates that there is sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to be on the site.

c. Not Applicable.

10. Enforcement or Other Actions

The City is not aware of any ongoing or anticipated environmental enforcement or other actions related to the site at 210 Bolton Avenue.

11. Sites Requiring a Property-Specific Determination

The City affirms that the Former Rush's Cleaners site at 210 Bolton Avenue does not require property-specific determination to be eligible for EPA Brownfields Grant funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes

Not Applicable.

(2) Alaska Native Village Corporations and Alaska Native Regional Corporations

Not Applicable.

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

Not Applicable.

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Not Applicable.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition

- (i) The City acquired the property by an Act of Donation from a private owner.
- (ii) The City acquired the property on _____, 2023.
- (iii) The City is the sole owner of the property and has fee simple title.
- (iv) The City accepted the property from the previous owner: Dien Tran.
- (v) The City does not have familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators of the site.

(b) Pre-Purchase Inquiry: Environmental professionals interviewed Ms. Dien Tran, owner, and Mr. Rod Noles, owner representative, as part of the most recent Phase I assessment on August 25, 2023. The owner, along with her brother, purchased the property in 2006 with the intention of reopening the facility as a drycleaner. Her brother passed away shortly thereafter and Ms. Tran did not pursue renovation and reopening the site. The site has had no uses since Ms. Tran acquired in 2006. She was aware of the following assessments on the property:

- (i) All site assessments were performed for the City of Alexandria, Louisiana through either brownfield assessment grants or paid through general funds:
 - Phase I Environmental Site Assessment dated January 2011;
 - Phase I Environmental Site Assessment dated July 20, 2022;
 - Phase I Environmental Site Assessment dated August 28, 2023;
 - Phase II Environmental Site Assessment dated September 2011;

- Additional Phase II Environmental Site Assessment dated October 24, 2023;
 - Analysis of Brownfield Cleanup Alternatives dated October 24, 2023.
- (ii) Terracon Consultants performed the Phase I Environmental Site Assessments completed in July 2022 and August 2023 prior to property acquisition. The assessments were performed under the direction of Environmental Professional, Rachel Keane, who exceeds the qualifications of an Environmental Professional, as defined in Section 312.10 of 40 CFR. Both reports were completed as part of the City of Alexandria's community wide assessment grant funding.
- (iii) Not Applicable.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal: All disposal of hazardous substances at the site occurred before the City acquired the property. The City has not caused or contributed to the release of any hazardous substances on the property. The City has not, at any time, arranged for the disposal of hazardous substances at the property or transported hazardous substances to the property.

(d) Post-Acquisition Use: The City has not allowed for any post-acquisition use.

(e) Continuing Obligations:

(i) There are no known continuing releases at this time. To stop continuing releases, the City 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 property and none that would release hazardous substances.

(ii) The City has exercised appropriate care with hazardous substances found at the site by taking reasonable steps to prevent any future releases. The planned cleanup activities will further prevent future releases. The City intends to use Cleanup Grant funds to treat and/or remove impacted soils and treat impacted groundwater, effectively limiting exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical State program requirements, any residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions as will be defined in the No Further Action Finding Letter issued by the LDEQ, thus fulfilling the City's continuing obligations in regard to future releases of known hazardous substances found at the site.

(iii) The City has exercised appropriate care with hazardous substances found at the site by taking reasonable steps to prevent or limit exposure to any previously released hazardous substance. To prevent or limit exposure to any previously released hazardous substance, the City has secured the building, and inspects the ground on a periodic basis. Any planned activities at the site, such as demolition, will be done following a management plan that will prevent or limit exposure.

The City confirms its commitment to:

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

The City of Alexandria will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment.

a. The City does not intend to enroll the site in the State of Louisiana’s Voluntary Remediation Program, but rather, will proceed with the State’s Risk Evaluation Corrective Action Program (RECAP) program designed specifically to regulate assessment and cleanup activities while addressing risks to human health and the environment posed by the release of chemical constituents to the environment. The City will hire a qualified environmental contractor (EC) to aid in implementing remediation activities. The EC will provide the technical expertise required to conduct, manage, and oversee the cleanup. The City will comply with competitive procurement provisions of 2 CFR §§ 200.317 through 200.327 and ensure that this technical expertise is in place prior to beginning cleanup activities.

b. The site is bound on its east side by Bolton Avenue and on its south, west, and portion of the north side by City-owned property and as such, are accessible during cleanup activities. In the event that access becomes necessary to the remaining adjoining properties, the City can obtain an access agreement.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

The City of Alexandria announced their intent for apply for cleanup funding for the 210 Bolton Avenue Site and the proposed redevelopment on October 25, 2023. A draft ABCA for the site and this application was made available at this time for public review and comment. These documents summarized information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered; and
- the proposed cleanup.

b. Community Notification Ad

A community notification ad requesting public input was published on October 25, 2023, on the City of Alexandria’s website cityofalexandria.com, and the local newspaper *The Town Talk*. A copy of this grant application, including the draft ABCA was made available for public review and comment.

c. Public Meeting

A presentation was made during a regularly scheduled public council meeting on November 8, 2023, at 6:00 p.m. This live meeting was recorded for future use and the recording was posted to the City of Alexandria’s website cityofalexandria.com. The City documented participant attendance at the meeting. Comments were received until _____, 2023.

d. Submission of Community Notification Documents

The following community notification documents are included as an attachment to this proposal:

- a copy of the draft ABCA;
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at **14 days** before the application was submitted to the EPA;
- the comments received;
- response to those public comments;
- meeting notes from the public meeting; and
- meeting sign-in sheets/participant list.

15. Contractors and Named Subrecipients

Not Applicable.

DRAFT

Draft Analysis of Brownfield Cleanup Alternatives

Former Rush's Cleaners Site
210 Bolton Avenue
Alexandria, Louisiana
ACRES Property ID 124282

October 24, 2023

Prepared for:
City of Alexandria, Louisiana

Prepared by:
Terracon Consultants, Inc.

terracon.com

Terracon

Environmental



Facilities



Geotechnical



Materials

**Draft Analysis of Brownfield Cleanup Alternatives
Former Rush’s Cleaners Site
210 Bolton Avenue
Alexandria, Louisiana
ACRES Property ID 124282**

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1.0 INTRODUCTION AND BACKGROUND

This Draft Analysis of Brownfield Cleanup Alternatives (ABCA) is in support of an application for United States Environmental Protection Agency (EPA) Brownfield Cleanup grant funding to address hazardous substances at the Former Rush's Cleaners ("the Site") located at 210 Bolton Avenue, Alexandria, Louisiana. The City of Alexandria (City) intends to redevelop the Site into a mobility hub centered around their transit bus system, which will serve as a catalyst for revitalization of the disadvantaged community.

The EPA Brownfield Cleanup Grant application must include, as an attachment, an ABCA which briefly summarizes information about the Site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup. The ABCA should also include information on the effectiveness, the ability of the grantee to implement each alternative, the cost of each proposed cleanup alternative, an evaluation of how commonly accepted climate change conditions might impact proposed cleanup alternatives, and an analysis of the reasonableness of the various cleanup alternatives considered, including the one chosen. The ABCA submitted as part of the proposal is intended as a brief preliminary document summarizing the larger and more detailed technical and financial evaluations performed in addressing each of these areas. The ABCA may be modified technically and financially or in more depth relative to each of these areas upon award of funding and in response to community interaction.

Cleanup alternatives were evaluated in accordance with EPA Region 6 protocols and general guidance required prior to implementation of a cleanup design using EPA Brownfields Grant funding. More specifically, this ABCA summarizes viable cleanup alternatives based on site-specific conditions, technical feasibility, resiliency to climate change conditions, and preliminary cost/benefit analyses. US EPA guidance requires that a minimum of two different alternatives plus a "No Action" option be considered in this document. Specific cleanup alternatives and associated recommendations are presented in the applicable sections of this report.

1.1 Background

The 1.0 acre Site at 210 Bolton Avenue hosted residential homes from 1914 through the 1950's when it was redeveloped as a drycleaner that operated until approximately 2001. The operation was housed in a 12,350-square foot building with a 2,500-square foot addition constructed some years later. Tetrachloroethene, also known as Perchloroethylene or "PERC", was the drycleaning solvent used at the Former Rush's Cleaners for roughly 50 years. The property has sat vacant since 2001 and the buildings are in a state of disrepair.

The Site has confirmed soil and groundwater impacts in the form of volatile organic compounds (VOCs) that are above the State of Louisiana's Risk Evaluation Corrective Action Program (RECAP) Screening Standards. The Louisiana Department of Environmental Quality (LDEQ) developed the RECAP to address risks to human health and the environment posed by the release of chemical constituents to the environment. This is LDEQ's primary statutory mandate for remediation activities. It is clear in Louisiana's Environmental Quality Act that risk to human health and the environment must be evaluated in the remedial decision-making process.

The Site shows evidence that historical releases from the drycleaning operations occurred, likely from leaking equipment and associated piping and improper storage and disposal, such as pouring spent solvents down drains, which commonly failed and released to the environment due to the nature of the chemicals. The overall vertical and lateral extents of contamination have been generally identified, with the VOC-impacted soils and groundwater occurring primarily beneath the main building near where the equipment was formerly located and to the south and west of the building.

1.2 Site Assessment Findings

A Phase I Environmental Site Assessment (ESA) report dated January 2011 was performed on the Site by Providence Engineering and Environmental Group, LLC (Providence) for the City of Alexandria under its Brownfields Hazardous Assessment Grant. The Phase I ESA identified the historical operations as a drycleaning facility as a recognized environmental condition (REC). Based on the findings of the Phase I ESA, Providence performed a Phase II ESA, report dated September 2011. As part of the EPA approved scope of work eight borings were advanced at the site and converted to temporary wells for the collection of soil and groundwater samples. The borings were advanced in areas where the dry-cleaning operations occurred. Additionally, at the request of the Louisiana Department of Environmental Quality (LDEQ), a boring was advanced in the vicinity of the adjoining fueling station to the northeast. Up to four soil samples were collected per boring. The soil and groundwater samples were analyzed for volatile organic compounds (VOCs), total petroleum hydrocarbons (TPH) as gasoline range organics (GRO) and diesel range organics (DRO), extractable petroleum hydrocarbons (EPH), volatile petroleum hydrocarbons (VPH). The findings of the Phase II ESA identified perchloroethylene and its daughter compounds in soil and groundwater above LDEQ Risk Evaluation/Corrective Action Program (RECAP) screening standards.

In 2011, TEA Inc, performed a Phase I ESA on the undeveloped lots adjacent to the southeast and southwest of the Site for the City of Alexandria under the LDEQ Targeted Brownfields Assessment program. The undeveloped lots were owned by the City of Alexandria. The Phase I ESA identified the historical drycleaning operations as REC in connection to the Former Rush's Cleaners Site. Therefore, TEA performed a Phase II ESA to determine if the adjacent lots had been impacted from the historical drycleaning operations. In accordance with an LDEQ approved Sampling and Analysis Plan, 13 borings were advanced near the property boundaries of the adjacent lots and converted to temporary wells for the collection of soil and groundwater samples. Additionally, the temporary wells were surveyed to determine groundwater flow direction. Groundwater flow was determined to be in the southerly direction. All soil and groundwater samples were analyzed for VOCs, VPH, EPH, metals and semi-volatile organic compounds (SVOC). The analytical results identified concentrations of perchloroethylene and its daughter compounds in surface soil (0-15 feet), subsurface soil (>15 feet), and groundwater at concentrations above RECAP SS.

As part of the 2011 investigation and to assist in future site planning decisions, soil and groundwater constituents of concern (COC) that exceeded RECAP SS were further evaluated under LDEQ's RECAP Management Option-1, to develop site-specific risk-based standards. As

the proposed redevelopment plans consisted of a bus terminal, an industrial exposure scenario was applied to the site. Additionally, as proposed redevelopment plans included the construction of a new building, the soil protective of enclosed structures (Soiles) and groundwater protective of enclosed structures (GWes) were also evaluated. Management Option-1 Limiting RECAP Standards (LRS) were developed in accordance with RECAP Appendix H. The MO-1 Evaluation identified concentrations of COC in soil above the Soiles and concentrations of COC in groundwater above the GWes. Concentrations of COC were below the MO-1 LRS developed for surface soil, subsurface soil and groundwater.

In 2023, Terracon performed a Phase I ESA on the Site for the City of Alexandria. The previous site assessment reports were reviewed as part of the Phase I ESA. The 2011 exceedances were identified as a REC in connection to the Site. Additionally, the active fueling station adjoining to the northeast was identified as a REC. The Phase I ESA recommended additional investigation.

Subsequently, Terracon performed a site investigation in October of 2023 to confirm current site conditions, further vertically delineate known contaminants and investigate potential impacts from the off-site active fueling station. Four soil borings were advanced at the site in the vicinity of previous borings exhibiting exceedances and in the vicinity of the active fueling station. Soil and groundwater samples were analyzed for a select combination of VOCs, EPH, VPH, lead and polycyclic aromatic hydrocarbons. The analytical findings identified perchloroethylene and its daughter compounds in surface soil, subsurface soil and groundwater above RECAP SS. These COC were further evaluated under RECAP MO-1. As the proposed site use is a bus terminal, an industrial exposure scenario was applied. Additionally, as construction of new buildings is proposed, the GWes and Soiles were evaluated. The MO-1 evaluation identified COC above the MO-1 LRS in the surface soil, groundwater, and the Soil es and GWes. Therefore, corrective action is needed in order to ready the site for re-use.

2.0 PROJECT GOAL AND RE-USE PLAN

Cleanup of the Former Rush's Cleaners site will be necessary for re-use as the City's new transit station. City leadership recognizes the critical importance to the community for relocation of the City of Alexandria's transit (ATRANS) station to the Site and its redevelopment into the Bolton Ave Mobility Hub. The City has acquired the Site and surrounding property necessary to implement this redevelopment. The 2021 Brownfields Revitalization Master (BFRM) Plan created during the FY20 Assessment project addresses this specific vision and its beneficial impact to the disadvantaged community members as well as surrounding brownfield sites located in the area. In addition to this brownfield-focused plan, the City has established the following plans that address this critically needed relocation of the public transit center and its benefits to further revitalize the target area: 2020–2025 Consolidated Plan and the 2020 City Revitalization Master Plan. By relocated ATRANS station to the Former Rush's Cleaners site and transforming into the Bolton Ave Mobility Hub, the transit hub will be centrally located within the City, does not require rerouting of existing transit routes, and provides opportunities for first-mile/last-mile connections via pedestrian and bicycle routes or car-sharing programs. Overall, the City believes this redevelopment will serve as a catalyst for revitalization of the disadvantaged community.

3.0 APPLICABLE REGULATIONS FOR SITE REMEDIATION

3.1 Cleanup Responsibility

The Louisiana Department of Environmental Quality's (LDEQ's) Risk Evaluation/Corrective Action Program (RECAP) regulation has been promulgated and became final on October 20, 2003. This regulation establishes the Department's minimum remediation standards for present and past uncontrolled constituent releases. RECAP is the State of Louisiana's "normal regulatory oversight program" and is consistent with the Environmental Protection Agency's (EPA) guidance on risk assessment. However, RECAP establishes policy decisions for the State of Louisiana that are left open to interpretation in EPA guidance. These policy issues include appropriate risk level, exposure concentration, groundwater use, land use, points of exposure, and points of compliance.

LDEQ's Voluntary Remediation Program (VRP) facilitates the redevelopment of properties with environmental issues by providing applicants the ability to receive a Certificate of Completion (COC) after the successful remediation of environmental contamination at a site. The COC releases the applicant(s) and future site owners, successors and assigns of liability for all past contamination. Through the Voluntary Remediation Program, LDEQ provides administrative, technical, and legal incentives to encourage the redevelopment and reuse of vacant properties that would otherwise remain abandoned.

When a site is eligible for the VRP, such as the Former Rush's Cleaners, and contaminants are identified above the LDEQ RECAP Screening Option, the applicant can choose to enter into the VRP or evaluate/remediate the site under LDEQ's normal regulatory process, RECAP.

It has been determined the Site remediation activities will be conducted under LDEQ's RECAP. LDEQ will provide regulatory oversight of the cleanup through its Remediation Division and Brownfield Technical Liaison.

3.2 Cleanup Standards

LDEQ RECAP uses risk evaluation to: (1) determine if corrective action is necessary for the protection of human health and the environment, and (2) identify constituent levels in impacted media that do not pose unacceptable risks to human health or the environment, i.e., RECAP Standards. RECAP consists of a tiered framework composed of a Screening Option and three Management Options. This tiered approach allows site evaluation and corrective action efforts to be tailored to site conditions and risks. As the Management Option level increases, the approach becomes more site-specific and, hence, the level of effort required to meet the objectives of the Option increases. Although the level of effort required for each Option varies, each Option achieves a common goal: protection of human health and the environment.

The Former Rush's Cleaners Site has been evaluated under RECAP's Management Option-1 tier and site-specific remediation standards for industrial re-use have been developed to determine the remediation necessary for protection of human health and the environment and subsequent re-use of the Site.

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Former Rush's Cleaners
210 Bolton Avenue ■ Alexandria, LA



AOI	COC	Highest Detected Concentration (ppm)	Limiting RECAP Standard Enclosed Space (ppm)	Limiting RECAP Standard Industrial Use, No Enclosed Space (ppm)
Surface Soil (0-15' bgs)	PCE	421	29	35
	TCE	58.2	10	0.21
	DCE	13.4	3	340
	VC	0.766	0.028	0.79
Subsurface Soil (15'-depth of impact)	PCE	239	NA	360
	TCE	20	NA	132
	DCE	31	NA	1200
	VC	0.563	NA	106
Groundwater	PCE	75.9	36	1.1
	TCE	89.9	25	9.24
	DCE	748	11	748
	VC	13.6	0.49	15.8

PCE= Tetrachloroethene, TCE = Trichloroethene, VC = Vinyl Chloride, DCE = cis-1,2 Dichloroethylene, ppm = parts per million
NA = Not Applicable, per RECAP enclosed space standards are not applicable to subsurface soils

3.3 Applicable Laws and Regulation for Cleanup Activities

Laws and regulations that are applicable to this cleanup may include:

- Federal Small Business Liability Relief and Brownfields Revitalization Act
- Federal Davis-Bacon Act
- Occupational Safety and Health Act
- Department of Transportation
- Resource Conservation and Recovery Act
- RECAP, Louisiana Administrative Code (LAC) 22:I.Chapter 13, La R.S 30:2272
- Louisiana Solid Waste Beneficial Use and Soil Reuse, LAC 33:VII. Chapter 11
- Louisiana Hazardous Waste and Hazardous Waste Materials, LAC 33.V.109
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §§ 9601, et. seq.

In addition, all appropriate permits and notifications (e.g., soil disposal acceptance notification, soil transport/disposal manifests, etc.) will be obtained prior to the work commencing.

4.0 CLEANUP ALTERNATIVES

VOC contaminated soils are considered hazardous substances relative to cleanup grant funding. EPA proposal guidance requires the ABCA, at a minimum, to consider two different cleanup remedies and a "no action" alternative. RECAP defines an area of investigation (AOI) as a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting standard. Cleanup alternatives were developed based on the AOIs identified in the various investigations. The investigations identified the following AOIs:

- **Surface Soil:** RECAP defines surface soil as the soil interval present from ground surface to a depth of 15 feet bgs. COC were identified at various depths within 15 feet at concentrations within the surface soil above limiting standards.
- **Subsurface Soil:** RECAP defines subsurface soil as the soil interval present from 15 feet bgs to the depth of impact. COC were identified at depths past 15 feet to terminal depths of the boring at concentrations above RECAP screening standards but below MO-1 LRS.
- **Groundwater:** COC were identified in groundwater at concentrations greater than the limiting standard. Groundwater at the site has been classified as Groundwater 3, which is defined as groundwater within an aquifer that is sufficiently permeable to transmit water to a well at a maximum sustainable yield of less than 800 gallons per day or has a groundwater quality that has a total dissolved solids concentration greater than 10,000 mg/l. Groundwater can be further classified as Groundwater 3 Non-drinking water, as the nearest down gradient surface water body (Bayou Hynson) is not considered a drinking water source. Groundwater was typically encountered at depths varying from 5 to 9 feet bgs. The thickness of the groundwater bearing zone is less than five feet.
- **Enclosed Space:** RECAP defines an enclosed structure as an occupied or potentially occupied structure on a slab foundation that has a roof and wall on all sides which prevent the free exchange of indoor air with outdoor (ambient air). Volatile constituents present in soil and/or groundwater beneath an enclosed structure pose a risk to indoor air quality. RECAP standards have been developed to evaluate the inhalation of volatile emissions in soil and groundwater to an enclosed structure pathway. Volatile COC were detected in soil and groundwater above the enclosed space standards for soil and groundwater.

Under RECAP, typically, contaminated surface soils can be remediated by removing and properly disposing of surface soils. As the redevelopment plans included the construction of an enclosed structure there is potential for human exposure of inhalation of volatile emissions from soil and groundwater. One option would be to remove surface soils exceeding the enclosed space standards with in-situ oxidation treatment for groundwater. A second option would be to remove surface soils exceeding the limiting standard with in-situ oxidation treatment for groundwater. Under this option a Site use restriction would have to be placed to prevent the construction of an enclosed structure, unless a vapor mitigation system is designed, on the impacted area. This would eliminate the inhalation of volatile emissions to enclosed structure pathway. Under both options, as industrial use exposure is applied to the site, a conveyance notice would have to be filed indicating that the site was evaluated under industrial use and if the site use is to change to non-industrial, further evaluation and or remediation would be required by LDEQ.

In addition to effectiveness, implementability, and cost, consideration was given to the sustainability of cleanup alternatives with regard to current and future climate change concerns. According to the National Oceanic and Atmospheric Administration's (NOAA) National Climate Assessment, the primary climate change conditions identified for the South region include increased temperature, decreased water availability, and rising sea levels. Increased temperature and decreased water availability have been identified as Site-specific climate change

considerations and the resiliency of each cleanup alternative will be evaluated against these considerations.

To address hazardous substances at the Site, three different alternatives were considered (*minimum two different alternatives plus a "No Action" option*). These alternatives are outlined below. The following subsections present each alternative in greater detail, including estimated costs and potential contingency items:

Table 1: Summary of Cleanup Alternatives

Cleanup Alternative	Description
A	Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding enclosed space RECAP Standards with in-situ chemical oxidation for Groundwater.
B	Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding industrial RECAP Standards, in-situ chemical oxidation for Groundwater, and use restrictions regarding structures over the impacted area.
C	No Action

4.1 Cleanup Alternative A: Excavation and Off-Site Disposal of Impacted Surface Soils Exceeding enclosed space RECAP Standards with in-situ chemical oxidation for Groundwater

Alternative A includes excavation and removal of impacted surface soils (0-15 feet) exceeding enclosed space RECAP standards. Soil confirmation samples will be collected from the sidewalls and bottom of the excavation area to ensure impacted surface soils have been removed. As groundwater is typically encountered at depths of 5 to 9 feet bgs, groundwater will be encountered during excavations. Accumulated groundwater will be treated directly in the open excavation. Activated persulfate would be mixed above grade and added as a solution to the open excavation. Additional persulfate would be injected through direct push methods. The open excavation will then be backed filled with imported fill. Temporary monitoring wells will be installed to collect confirmation groundwater samples. Prior to the Site remediation activities, a remediation plan would be developed and approved by the LDEQ. As the limiting standards are based on an industrial/commercial exposure, a conveyance notice will be filed to limit site use to commercial/industrial use.

4.1.1 Effectiveness – Including Climate Change Considerations

The impacted soils are permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. Maintenance will not be required. With removal and off-site disposal of contaminants, the approach requires no special post-remedy institutional or land use controls for the property, with the exception of site use limited to industrial/commercial use. If Site uses were to change from industrial/commercial to non-industrial/residential, the site would have to re-evaluated and further corrective action may be warranted.

The Site-specific climate change conditions identified include increased weather activity which

could excavation activities (stormwater contact with contaminated soils). Removal of all hazardous materials reduces the potential for environmental contamination.

4.1.2 Implementability

This alternative is readily implementable. It is a mature remedy common in the remediation industry. The approach requires construction equipment readily available in the local construction and engineering markets. The materials for backfill are readily available in the local area. A labor force readily exists in the area to accomplish the remedy. The implementation period is shorter-term, on the order of 1-3 months following approval of a remediation plan.

4.1.3 Cost

Based upon Terracon's experience with similar projects, the estimated cost for excavation and off-site disposal of contaminated soil, confirmation sampling, temporary well installation, insitu-oxidation, development of a remediation plan and required reporting, and professional environmental consulting services is approximately \$TBD.

4.2 Cleanup Alternative B: Excavation and Off-Site Disposal of Impacted Surface Soils, exceeding Industrial Limiting Standards with In-situ Oxidation for Groundwater and Use Restriction of Enclosed Structures over Impacted Areas.

Alternative B includes excavation and removal of impacted surface soils (0-15 feet) exceeding Industrial Limiting RECAP standards. Soil confirmation samples will be collected from the sidewalls and bottom of the excavation area to ensure impacted surface soils have been removed. As groundwater is typically encountered at depths of 5 to 9 feet bgs, groundwater will be encountered during excavations. Accumulated groundwater will be treated directly in the open excavation. Activated persulfate would be mixed above grade and added as a solution to the open excavation. Additional persulfate would be injected through direct push methods. The open excavation will then be backed filled with imported fill. Temporary monitoring wells will be installed to collect confirmation groundwater samples. Prior to the Site remediation activities, a remediation plan would be developed and approved by the LDEQ. In addition to limiting site use to industrial use, additional site use restrictions will include restriction of enclosed structures on the impacted areas unless a vapor mitigation system is installed.

4.2.1 Effectiveness – Including Climate Change Considerations

The impacted soils are permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. Maintenance will not be required. However, as the limiting standards are based on industrial/commercial use, if Site uses were to change from industrial/commercial to non-industrial/residential, the site would have to re-evaluated and further corrective action may be warranted.

Site use restrictions such as restricting enclosed structures, unless a vapor mitigation system is installed, on the impacted area will eliminate the inhalation of volatile emissions from soil and groundwater pathway.

The Site-specific climate change conditions identified include increased weather activity which could excavation activities (stormwater contact with contaminated soils). Removal of all hazardous materials reduces the potential for environmental contamination.

4.2.2 Implementability

This alternative is readily implementable. It is a mature remedy common in the remediation industry. The approach requires construction equipment readily available in the local construction and engineering markets. The materials for backfill and cover are readily available in the local area. A labor force readily exists in the area to accomplish the remedy. The implementation period is shorter-term, on the order to 1-3 months, following approval of a remediation plan.

4.2.3 Cost

Based upon Terracon's Based upon Terracon's experience with similar projects, the estimated cost for excavation and off-site disposal of contaminated soil, confirmation sampling, temporary well installation, insitu-oxidation, development of a remediation plan and required reporting, and professional environmental consulting services is approximately \$TBD.

Costs associated with designing and implementing a vapor mitigation system are not included.

4.3 Cleanup Alternative C: No Action

The "no action" scenario is required by the EPA ABCA process. No action would be taken to cleanup contaminated soils and the contamination in these areas would be allowed to naturally degrade over time.

4.3.1 Effectiveness

This alternative is deemed ineffective for Brownfield redevelopment. Socially it does not allay stigma for future investments or disadvantaged community members. This alternative does not address potential risks to human health and environment. During Site redevelopment, workers would face an increased risk of exposure to Site contaminants.

4.3.2 Implementability

By its definition, taking no action precludes a discussion of implementation.

4.3.3 Cost

By its definition, taking no action precludes a discussion of cost to implement. This cleanup alternative would not include any specific efforts to remove or maintain contaminated soils in place. There would be no direct cleanup costs associated with this alternative. Further, this alternative may later result in redevelopment complications, delays and increased redevelopment costs due to contaminated soils and groundwater remaining onsite. There would be no additional direct costs associated with alternative. Indirect costs could include the continuing inability to utilize the property for public benefit as is currently planned.

4.4 Comparison of Alternatives

The table below presents a brief comparison of factors previously discussed for alternatives under consideration.

Table 2: Summary Comparison of Alternative

Alternative	Effectiveness	Implementability	Estimated Cost
A – Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding Enclosed Space Standards with In-situ oxidation for Groundwater	This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk.	This alternative is technically achievable and common in the remediation industry. Resources to implement this alternative are readily available and time to implement is relatively short (on the order of 1-3 months).	\$TBD
B – Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding Industrial Limiting RECAP Standards with In-situ Oxidation for Groundwater and Use Restrictions of Enclosed Structures Over Impacted Areas	This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. will eliminate the inhalation of volatile emissions from soil and groundwater pathway.	This alternative is technically achievable and common in the remediation industry. Resources to implement this alternative are readily available and time to implement is relatively short (on the order of 1-3 months).	\$TBD
C – No Action	Does not address risks	No applicable	Negligible direct cost

5.0 RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup approach is Alternative A: Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding Enclosed Space Standards with In-situ oxidation for Groundwater. Remedial activities at the site will be overseen by LDEQ for regulatory oversight purposes. VOC-impacted soils will be removed in the highest impacted areas to a depth of 15 below ground surface (bgs). VOCs in soils beyond 15 bgs will be treated as needed by in-situ chemical oxidation using activated persulfate or another suitable oxidant, which will be directly applied in open excavations prior to backfilling and injected in the concentrated areas of impact. A VMS will be incorporated into the design of the new buildings. Dissolved VOCs in groundwater will be treated by in-situ chemical oxidation using activated persulfate or another suitable oxidant, which will be directly applied in open excavations prior to backfilling and injected downgradient from the excavations via direct-push methods. These actions will effectively eliminate the potential for exposure to impacted soils, remove ongoing sources of impact to groundwater, treat residually impacted groundwater downgradient from the source removal areas, and allow

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construction of new buildings over the residual impacted areas while addressing the potential for vapor intrusion.

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