CITY OF COFFEYVILLE **BOARD OF COMMISSIONERS AGENDA ITEM**		
MEETING DATE	January 14, 2014	
RESOLUTION OR ORDINANCE NUMBER	n/a	
AGENDA TITLE	**"Rails to Trails" Bike Trail EPA Grant Applications**	
REQUESTING DEPARTMENT	N/A	
PRESENTER	Michael Shook, Deputy Director of Electric Utilities	
FISCAL INFORMATION	Cost as recommended:	N/A
	Budget Line Item:	N/A
	Balance Available	N/A
	New Appropriation Required:	[ ] Yes [X] No
PURPOSE	To apply for financial assistance through available federal Environmental Protection Agency grants to develop a Bike Trail, connecting Sherwin Williams Park to LeClere Park.	

BACKGROUND	The Leadership Coffeyville Class of 2012 selected as its class project to assist in developing a series of bike trails to connect the community parks and provide an alternate, safe route to each. The Class viewed its role as a way to get community groups together, develop a plan, and to apply for any available funding sources that may be available. Through the collaborative efforts of the Leadership Class of 2012, the City of Coffeyville, Sherwin Williams Company, Terracon, Coffeyville Area Community Foundation, Coffeyville Recreation Commission, and the Coffeyville Community Enhancement Foundation, a bike trial route was determined. The project would be completed in phases. Determined as Phase 1, the bike trail route was established. The route would begin at 4th Street, east of the Sherwin Williams Plant, along an abandoned rail line, traveling north until the rail line splits, and travels east. Currently the City of Coffeyville has ownership of a portion of the property, and is seeking to gain ownership of additional rail line through Union Pacific. This area has been determined to have contaminated soil, and therefore would require remediation to be completed. Remediation could include “capping” the area with an all-weather surface, such as concrete or asphalt. Two sources of possible grant funding have been determined through the Environmental Protection Agency which include an EPA Brownfields Assessment Grant and an EPA Brownfield Cleanup Grant. Additional State, Federal, and private grants are being sought. As part of the grant application process, a Public Hearing must be held and comments accepted.
SPECIAL NOTES	N/A
ANALYSIS	N/A

PUBLIC INFORMATION PROCESS	Public Notices have been published in: Coffeyville Journal City of Coffeyville Website Coffeyville Public Library
BOARD OR COMMISSION RECOMMENDATION	
STAFF RECOMMENDATION	
REFERENCE DOCUMENTS ATTACHED	Public Notices Draft Analysis of Brownfield Cleanup Alternatives Draft EPA Brownfields Assessment Grant Application Draft EPA Brownfields Cleanup Grant Application Aerial Photography of Proposed Project Phase 1

NOTICE OF APPLICATION FOR U.S. EPA BROWNFIELDS ASSESSMENT GRANT

PROPOSED BIKE/WALKING TRAIL
COFFEYVILLE, KANSAS

The City of Coffeyville is applying of a U.S. Environmental Protection Agency (EPA) Assessment Grant for funding environmental assessment activities at properties around the proposed biking/walking trail and within the City of Coffeyville. The proposed trail runs along the former Missouri Pacific Railroad from west of the intersection of 4th Street and Poplar Place north to an area north of the intersection of 1st Street and Poplar Place.

Draft copies of the grant application will be available for public review and comment beginning January 8, 2014 at the Coffeyville Public Library located at 311 W. 10th Street in Coffeyville, Kansas. A public meeting is scheduled to coincide with the City Commission meeting held at 6:30pm on January 14, 2014. The meeting is held on the 2nd Floor Commission Room, 102 W. Seventh Street, Coffeyville, Kansas. Written public comments will be accepted at any time prior to and during the public meeting. Please send comments to: Scott Massman, P.O. Box 1629, Coffeyville, KS 67337.

NOTICE OF APPLICATION FOR U.S. EPA BROWNFIELDS CLEANUP GRANT

PROPOSED BIKE/WALKING TRAIL
COFFEYVILLE, KANSAS

The Coffeyville Community Enhancement Foundation (CCEF) is applying of a U.S. Environmental Protection Agency (EPA) Cleanup Grant for funding proposed remediation activities for the proposed biking/walking trail. The proposed trail runs along the former Missouri Pacific Railroad from west of the intersection of 4th Street and Poplar Place north to an area north of the intersection of 1st Street and Poplar Place. The proposed remediation will likely include limited excavation of lead impacted soil and construction of a concrete cap.

Draft copies of the grant application and the Draft Analysis of Brownfield Cleanup Alternatives (ABCA) document will be available for public review and comment beginning January 8, 2014 at the Coffeyville Public Library located at 311 W. 10th Street in Coffeyville, Kansas. A public meeting is scheduled to coincide with the City Commission meeting held at 6:30pm on January 14, 2014. The meeting is held on the 2nd Floor Commission Room, 102 W. Seventh Street, Coffeyville, Kansas. Written public comments will be accepted at any time prior to and during the public meeting. Please send comments to: Scott Massman, P.O. Box 1629, Coffeyville, KS 67337.

III.C Threshold Criteria for Assessment Grants

III.C.1 Applicant Eligibility

The City of Coffeyville is a General Purpose Unit of Local Government.

III.C.2 Letter from the State or Tribal Environmental Authority

Please reference Exhibit A.

III.C.3 Community Involvement

A copy of this draft proposal was made available to the Coffeyville Library on 1/8/2014. A public notice announcing this availability was posted on 1/8/2014. The document was also made available on the City's webpage. This grant application was placed on the agenda of the City of Coffeyville's council meeting on 1/14/2014 for discussion.

III.C.4 Site Eligibility and Property Ownership Eligibility

Does not apply – Community-wide grant application

Ranking Criteria for Assessment Grants

V.B.1 Community Need (45 Total Points)

V.B.1.a Targeted Community and Brownfields (20 Points)

V.B.1.a.i Targeted Community Description (5 Points)

Coffeyville was originally established as a trading and commercial city and through the years it has never lost that character. The city was incorporated in March, 1872, but the corporation was found to be illegal and it was again incorporated in March, 1873. During the last thirty years of the 19th Century, it steadily grew and flourished as a trading center of a rich and prosperous farming region. Moreover, it came to be known as one of the most important grain and flour milling points to the Central West.

Around 1900, the progressive businessmen of Coffeyville recognized the possibilities of the proximity of deposits of clay, sand and shale, together with natural gas as a fuel. Within the next few years their efforts brought to Coffeyville eight glass factories and five brick and tile plants as well as the former Ozark Zinc Smelter. The result was rapid expansion into an industrial city. In 1901, as a trading city, Coffeyville had a population of 5,000. By 1910, as an industrial city as well as a trading city, its population had increased and continued to increase for the next five years to 18,500. By 1916, the glass factories had closed their doors. At that time Coffeyville did, however, have a number of industries that are still active today: Rea Patterson Flour Mill (Bartlett Flour Mill), and the National refinery (Coffeyville Resources Refining and Marketing, LLC)[1]. Brick plants operating in the late 1890's and early 1900's included the Standard Brick

[1] "Early Coffeyville History", City of Coffeyville website, 2013.

Company, Vitrified Brick Company, Yoke Brick Company. When the plants were running at full speed, some 765,500 bricks were manufactured every day and shipped all over the world. Of the glass plants operating in the early 1900's, names that would be recognizable today include Ball Brothers Glass Factory and Mason Fruit Jar Company. These were just some of the factories that employed over 1,000 people. The factories closed in 1916, leaving over 1,000 people unemployed.

The community has experienced a slow and steady population decrease since 1960 when the population of the community was at the peak of 17,382 residents in the community.

The City of Coffeyville's Brownfields project focuses on two specific areas of our community: The proposed bike/walking trail on the western portion of the city and the downtown area.

The target community for the proposed bike/walking trail are the neighborhoods within Census Tract 9511 and 9508. These neighborhoods feed the area of the proposed rails to trails project. It should be noted that Census tract 9508 covers the entire west side of Coffeyville and only approximately 1/10th of the tract is within the target area. The target community for the downtown area is identified as Census Tract 9510.

The primary industries for the proposed bike/walking trail area are the former Sherwin Williams facility and the former Sinclair Refinery. The former Sherwin Williams facility provided jobs for 250 plus people (many from these census tracts) prior to the facility closing in 2013. The former Sinclair Refinery operated to the northeast of the proposed bike path between 1913 and 1948.

The Community Elementary School is located at the southern end of the proposed bike/walking trail. However, the school serves the city as a whole. According to the Kansas State Department of Education Report Card[2] 2013-2013 for the Community Elementary School, 77.24% of the children attending this school are considered to be economically disadvantaged. Of the total 1081 students in this school, 48.1% are white, 15.45% are Hispanic, 11.9% are black, and 24.5% are considered "other". The dropout rate for the school district was 2.5% in 2012, above the state average of 1.4%.

In the early 1990's the former Sherwin Williams facility conducted sampling at many residential yards within the target area. Based upon criteria developed as part of the facility's RCRA permit, soil removals were conducted at many residential yards based on site specific cleanup levels demonstrating a long history of health exposures to the residents within this target area. Previous investigations associated with the former Sinclair Refinery have indicated the presence of petroleum contaminated soil associated with the facility. Although corrective action activities

[2] http://svapp15586.ksde.org/rcard/district.aspx?org_no=D0445
[2]

have been completed at the site, historical releases to the environmental have occurred within the target area.

V.B.1.a.ii Demographic Information (5 Points)

	Census Tract 9508[1]	**Census Tract 9511**	**Census Tract 9510**	**Coffeyville**	**Kansas**	**National**
Population[2]	4,871	2,762	2,234	10,295	2,853,118	308,745,538
Unemployment[3 & 2]	6.8%	4.3%	16.8%	14.5%	5.6%	7.3%
Poverty Rate[2 & 4]	9.04%	11.7%	37.88%	17.4%	12.43%	13.82%
Percent Minority[2]	16.3% (non-white)	16.4% (non-white)	33.71 % (non-white)	25.8% (non-white)	14.8% (non-white)	26.7% (non-white)
Median Household Income[2]	$46,907	$34,552	$22,933	$33,964	$50,594	$52,762
Per Capita Income[2 & 4]	$23,161	$19,518	$12,640	$18,575	$26,545	$27,915
House Value[2]	$83,200	$49,700	$53,300	$54,900	$126,500	$186,200

1 – This tract covers approximately ½ of the greater Coffeyville area and only about 10% of the tract is in the target area.
2 - Data is from the 2010 US Census data available at www.census.gov, viewed December 2013
3 – Data from Bureau of Labor Statistics available at www.bls.gov, viewed December 2013
4 – Data from 2010 US Census provided by www.usa.com, viewed December 2013.

The above table illustrates the tough economic situation of Coffeyville and both of the target areas. Although the percentage of minorities within the target areas (with the exception of Census Tract 9510 which is above the national average) is below the national average, they are above the average for the State of Kansas. Of particular note is the disparity of the median household income and per capita income for the three Census Tracts that make up the target areas. In both cases the census tracts are below both the state and national average. Although the average house value for census tract 9508 is significantly higher than census tracts 9510 and 9511, this is likely due to the large geographic area the census tract encompasses, only 10% of which is in the target area. Lastly, the unemployment rate for Coffeyville as a whole is higher than both the state and national average. This is likely due to the recent closures of many facilities in Coffeyville which includes the adjacent former Sherwin Williams facility.

V.B.1.a.iii Brownfields (5 Points)

The properties that feed the proposed bike/walking trail area are one of the target areas to be evaluated as part of this assessment grant. The City has tentatively identified approximately 10 underutilized and/or vacant properties within this area. The former Sherwin Williams facility is located immediately west of the proposed bike/walking trail. The former industrial facility has been under a RCRA order but the target area is not included within that order. Like many brownfields properties, simply being located adjacent to this industrial facility has caused an impact.

As part of the investigation conducted in 1993/1994 by the former Sherwin Williams[3] facility, surface and subsurface soil samples were collected and analyzed for arsenic, barium, cadmium, lead, and zinc over many residential properties in the proposed bike/walking trail. Based on this data, many residential properties were identified as having elevated lead levels. Sherwin Williams conducted soil removal activities at several properties based on this sampling event. Lead affects adults and children in different ways. High lead levels in children may result in nervous system and kidney damage; learning disabilities, attention deficit disorder, and decreased intelligence; speech, language and behavior problems; poor muscle coordination; decreased muscle and bone growth; hearing damage; and seizures, unconsciousness, and death. High levels of lead in adults may cause increase change of illness during pregnancy; harm to a fetus; high blood pressure; digestive problems; nerve disorders; memory and concentration problems; and muscle and joint pain.

The downtown area was inventoried as part of the City's previous Brownfield Assessment grant. During this inventory approximately 43 potential brownfields properties were identified within the downtown area. Approximately 5 of these properties were assessed as part of the Brownfields Assessment grant, leaving several remaining. Many properties in the downtown area were constructed in the early to mid1900's at a time when asbestos and lead based paint were commonplace in construction. In addition to the potential lead exposures identified above, asbestos poses a threat to human health as well. Prolonged exposure to asbestos can cause asbestosis – an inflammatory condition of lungs that causes shortness of breath and lung scarring. In extreme cases it can cause mesothelioma (a rare lung cancer), and lung cancer.

V.B.1.a.iv Cumulative Environmental Issues (5 Points)

In addition to the Sherwin Williams facility, one of the City's electrical substations lies within the target area. The former Sinclair Refinery lies in the northern part of the target area. Previous investigations[4] associated with the former Sinclair Refinery have indicated the presence of petroleum contaminated soil associated with the facility. Although corrective action activities have been completed at the site, historical releases to the environmental have occurred within the target area. According to the Scorecard website (a pollution information website), there are ten industrial facilities on the toxic release inventory and five point sources of air pollution in the City of Coffeyville. The Kansas Department of Health and Environment's (KDHE) Identified Site

[3] Sherwin Williams RCRA site, RFI report, completed 1994.

[4] 2010 Performance Evaluation Report, Former Sinclair Refinery Site, Coffeyville, Kansas, AECOM, December 2010.

List, there are 28 state hazardous waste sites within the City of Coffeyville. There are 66 identified leaking underground storage tank sites in Coffeyville.

Additionally, the distribution of environmental burdens for Montgomery County (which includes Coffeyville) does not illustrate equitable distribution of these environmental burdens by race/ethnicity, income, or poverty. The ratio of people of color versus whites for releases of toxic chemicals is 1.36 and for facilities emitting criteria air pollutants is 1.38. The distribution of burdens by income is 1.1 (low/high income) for releases of toxic chemicals and 1.59 (low/high) for facilities emitting criteria air pollutants.

V.B.1.b Impacts on Targeted Community (15 Points)

As previously discussed, many families in the target areas have incomes below both the per capita and median household incomes for both the State of Kansas as well as the national average. According to the www.scorecard.com website, 6% of the houses in Montgomery County have a high risk of lead hazards. Although this study focuses on lead-paint, the would be impossible to separate blood levels that are elevated due to air-born dust from blood lead levels due to lead paint inhalation. The website also indicates that Montgomery County ranks 3rd in the state of the counties with the greatest reported releases of lead to air (with 210 pounds). For Census tract 9508, the website indicates 2.4% of the housing units have a high risk of lead hazards. The percentage for Census tract 9510 is 12% and for Census tract 9511 it is 8.7%. By the websites calculations, 40% of the children under the age of 5 were living below poverty in tract 9511, 29% in tract 9508, and 36% for tract 9510.

Although statistics for the target areas are not provided, Montgomery County ranks in the 70th percentile as the dirtiest/worst counties in the US for total environmental releases. The cancer risk for air and water release ranted in the 80th percentile of dirtiest/worst counties in the US. Air releases of recognized carcinogens and reproductive toxicants both ranked in the 90th percentile according to this criteria. According to www.city-data.com, the adult diabetes rate in Coffeyville is 10.1% while the State of Kansas's rate is 8.1%l. Additionally, the website indicates the adult obesity rate is 29.6% for the City while the state is at 27.9%. The biking/walking trail will provide a much needed healthy benefit to the community.

V.B.1.c Financial Need (10 total points)

V.B.1.c.i Economic Conditions (5 Points)

V.B.1.c.ii Economic Effects on Brownfields (5 Points)

V.B.2 Project Description and Feasibility of Success (50 Total Points)

V.B.2.a Project Description (25 points)

V.B.2.a.i Project Description (10 Points)

The Brownfields Assessment grant focuses on two targeted areas – the proposed bike/walking trail and surrounding properties, and the downtown area.

Not only will the proposed project prevent potential environmental exposures associated with potential contaminants in the proposed bike/walking trail area, it will encourage connectivity between two major parks for the city as well as promote health for our citizens through physical activity.

In addition to the exciting plans for the bike/walking path, Coffeyville has several initiatives underway that focus on revitalizing our downtown area.

V.B.2.a.ii Project Management Approach (5 Points)

If awarded, the City plans to spend the majority of grant funds ($175,000-each grant type) on Phase I and Phase II assessments. Approximately 90% of the grant funds from the City's previous assessment grant were expended on assessments and the City anticipates managing the new assessment grant similarly.

The City will hire environmental professionals to conduct assessments and adhere to the federal All Appropriate Inquiries Rule (AAI). Phase I ESAs conducted in accordance with AAI are designed to give property owners the information necessary to determine potential environmental issues associated with the project. The assessments will be focused on the two target areas (bike/walking trail and the downtown area) but assessments will be conducted within the community as requested.

Since many potential brownfields properties were identified during the City's previous brownfields inventory, this list will be updated to reflect current property conditions and properties bordering the proposed bike/walking trail will be added. Project area properties identified by the City will be screened to determine the potential for the property to meet the definition of a brownfield site based on historical property uses and eligibility criteria as well as public health and safety concerns and potential for reuse. Once screened, Phase I assessments that comply with the All Appropriate Inquiry Standard will be conducted for these projects. Results from the Phase I will determine which properties require Phase II assessments. In addition, for petroleum grant sites, the City will conduct 'liable & viable' petroleum screenings for property eligibility as required by Kansas statute. This means that Phase I assessments will include a determination of the corporate status of owners and previous owners. Throughout the assessment process the City will actively solicit input from project partners, stakeholders and citizens, particularly in the affected neighborhoods, during the site selection task. The City will utilize the evaluation matrix established during the previous assessment grant with weighting of the various evaluation criteria for potential brownfield sites.

Documented soil and/or groundwater contamination will provide the City, landowners, and future developers with information necessary to plan the next steps toward environmental site closure on a site-specific level, as well as potential cleanup costs. By addressing potentially

contaminated material, the potentially serious environmental risks that may be affecting community residents, and disproportionately affecting residents of adjacent neighborhoods will be identified.

V.B.2.a.iii Site Selection (10 Points)

As stated previously, the City has already identified potential brownfields properties located adjacent to the proposed bike/walking trail. Additionally, as part of the City's previous assessment grant, 43 potential brownfields sites in the downtown area were identified during the Brownfields inventory and only 5 of these properties were assessed. The City's inventory of potential brownfields sites will be updated and will include both the downtown area as well as the proposed bike/walking trail area. The update to the inventory may involve a "windshield survey" by the City's Consultant in the target areas. As was done during the last assessment grant, after the initial list of potential brownfields sites has been developed, each property will be evaluated to determine its eligibility as a brownfields site. For petroleum sites, the City will coordinate the screening of sites for eligibility relative to "liable and viable" in coordination with the KDHE Underground Storage Tank Section.

Once this inventory is updated, the City will invite key community stakeholders to assist with the site selection process. It is the City's experience that inviting key stakeholders to assist with this part of the site selection process greatly aids in getting landowners to cooperate with providing access to potential brownfields properties. The City will also connect with the community through informational meetings, neighborhood association gathering, church groups, local economic benefit organizations, web sites, social media, and most importantly, through personal discussions with individual property owners.

Since the City's Brownfields program has been established and members of the community know of past successes, members of the community approach the City for assessment assistance on brownfields properties unsolicited. These properties will also be reviewed as part of the site selection process since property owner interest is key to successful redevelopment.

It is important to remember that brownfields are really "real estate deals with an environmental twist". As such, the City will approach local real estate professionals to compare the inventory with properties that may be in key development areas.

V.B.2.b Task Description and Budget Table (20 Points)

V.B.2.b.i Task Description (15 Points)

<u>Explanation of Tasks for both Hazardous Substances and Petroleum Grant Budgets</u>

Task 1: Inventory of Sites/Project Management. As stated previously, the City will update the current brownfields inventory previously conducted on the downtown target area. The inventory will include properties adjacent to the bike/walking trail since the have not been inventoried.

The inventory may involve a “windshield survey” by the City’s Consultant of the areas that may require the most assistance initially. After the initial list of potential brownfields sites has been developed, each property will be evaluated to determine it’s eligibility as a brownfields site. For petroleum sites, the City will coordinate the screening of sites for eligibility relative to “liable and viable” in coordination with the KDHE Underground Storage Tank Section.

Activities associated with general project management of the grant (quarterly reporting, coordinating with EPA and KDHE, consultant oversight) will be conducted as part of Task 1. Funding for City staff to attend at least 1 to 2 national brownfields conferences and 2 regional conferences during the lifetime of the grant has been provided for in this Task.

Task 2: Community Outreach. During the City’s previous assessment grant, some existing community outreach processes have already been established. Within this task, the City will utilize established methods to inform the public of the importance for petroleum and hazardous substance assessments and increase awareness of brownfield prevention.

Between the historical oil spill associated with the 2007 Flood in the community and the education provided during the City’s previous brownfields grant, the community has a unique baseline awareness of environmental issues. The City seeks to expand upon this awareness and further educate the community about environmental issues. It is anticipated that 2 to 3 additional fact sheets will be developed and distributed to the public through a variety of mechanisms. Initial distribution may involve providing the fact sheets in City offices and the public library, making them available on the City’s website, and having fact sheets available during investigative activities to address potential questions that arise from citizens. In an effort to engage the “social media” community, the City will develop a Facebook page to inform citizens of project updates through social media.

It is anticipated that at least two to three public outreach events will occur during the course of grant activities. These activities may be in conjunction with City council meetings or may be “stand-alone” meetings for members of the public to provide comments to the City regarding potential redevelopment strategies. During the previous assessment grant the City had an informational booth at the “Downtown Coffeyville Days” and the “Dalton Defender Days”. The city has many redevelopment meetings are already occurring related to development efforts on the east side of Coffeyville, the brownfields projects might be added as line item discussion topics for the target audience. Community outreach during the meetings will be focused primarily on discussing the findings of the Environmental Site Assessments and seeking input from landowners, general public, neighborhood organizations and community development corporations.

Task 3: Phase I Assessments Funds in this task will be used to conduct Phase I ESAs. Activities associated with obtaining access from property owners are included in this task. It is estimated that each Phase I ESA will cost approximately $2,800 (including title searches) and it is estimated that 15 Phase I assessments for each grant type can be

conducted under their respective grant types. All Phase I assessments conducted with grant funds will be in compliance with the All Appropriate Inquiry Final Rule.

Task 4: Phase II Assessments. Based on the results of the Phase I ESAs, this task will involve detailed Phase II assessment of approximately six to eight sites to resolve recognized environmental conditions identified in the Phase I ESAs. The City's previous generic quality assurance project plan, site specific sampling and analysis plans, and site-specific health and safety plans will be updated as part of this task.

Task 5: Cleanup Planning. Upon completion of Phase II activities, sites with identified contamination above appropriate KDHE cleanup levels will be evaluated for potential cleanup strategies. If funds allow, Analysis of Brownfields Cleanup Alternatives (ABCAs) will be developed for sites, as appropriate. Assistance on application to the KDHE Voluntary Cleanup and Property Redevelopment Program (VCPRP) may also be provided as part of this task, if applicable.

V.B.2.b.ii Budget Table (5 Points)

Coffeyville is requesting $200,000 to conduct assessments at hazardous substance sites and $200,000 to conduct assessments at petroleum sites. The proposed budgets are detailed on the two respective tables on the following page.

Budget for Hazardous Substances Grant

Budget Categories	**Project Tasks**					
(programmatic costs only)	**Task 1 Inventory of Sites/Project Management**	**Task 2 Community Outreach**	**Task 3 Phase I Assessments**	**Task 4 Phase II Assessments**	**Task 5 Cleanup Planning**	**Total**
Personnel	$3,000	$4,000	$6,000	$6,000	$3,000	$22,000
Fringe Benefits	$0	$0	$0	$0	$0	$0
Travel	$5,000(1)	$0	$0	$0	$0	$5,000
Equipment	$0	$0	$0	$0	$0	$0
Supplies	$0	$500(2)	$0	$0	$0	$500
Contractual	$15,000	$8,000	$45,000	$94,500	$10,000	$172,500

Total	$23,000	$12,500	$51,000	$100,500	$13,000	$200,000
In-Kind Estimate(3)	*$500*	*$1,000*	*$1,000*	*$1,000*	*$1,000*	*N/A*

(1) For City staff to attend regional and national brownfields training events and/or conferences.
(2) For printed material and other supplies associated with public meetings and outreach events.
(3) The City of Coffeyville assumes a pro rata share of project management across all activities.

Budget for Petroleum Grant

Budget Categories	**Project Tasks**					
(programmatic costs only)	**Task 1 Inventory of Sites/Project Management**	**Task 2 Community Outreach**	**Task 3 Phase I Assessments**	**Task 4 Phase II Assessments**	**Task 5 Cleanup Planning**	**Total**
Personnel	$3,000	$4,000	$6,000	$6,000	$3,000	$22,000
Fringe Benefits	$0	$0	$0	$0	$0	$0
Travel	$5,000(1)	$0	$0	$0	$0	$5,000
Equipment	$0	$0	$0	$0	$0	$0
Supplies	$0	$500(2)	$0	$0	$0	$500
Contractual	$15,000	$4,000	$45,000	$94,500	$10,000	$172,500
Other	$0	$0	$0	$0	$0	$0
Total	$18,000	$8,500	$56,000	$104,500	$13,000	$200,000
In-Kind Estimate(3)	*$1,000*	*$1,000*	*$1,000*	*$1,000*	*$1,000*	*N/A*

(1) For City staff to attend regional and national brownfields training events and/or conferences.
(2) For printed material and other supplies associated with public meetings and outreach events.
(3) The City of Coffeyville assumes a pro rata share of project management across all activities.

V.B.2.c Ability to Leverage (5 Points)

V.B.3 Community Engagement and Partnerships (35 Total Points)

V.B.3.a Plan for Involving Targeted Community and Other Stakeholders and Communicating Project Progress (15 Points)

The City learned during the previous Brownfields Assessment Grant that the success of any project depends upon community and stakeholder backing. When people are involved in visioning activities for the future of the community, they become invested in the outcome. The City plans make efforts to get as many stakeholders invested in the outcome of the project as possible. As was found after the 2007 flood, disaster brings the community together and Coffeyville plans to build upon the existing "spirit of community" that was derived after the flood.

The City presented information contained in this grant application at a City Commission Meeting on January 14, 2014 to allow the community an opportunity to discuss this grant application. A public notice regarding the public hearing was published in the local newspaper on January 8, 2014. A copy of the notice is attached as Exhibit B. The grant application will also be available to the public for review at the Coffeyville Public Library and on the City's website. Any comments received will be considered for incorporation into the project, if awarded.

We will regularly communicate the progress of brownfields redevelopment projects in the City through a number of different mechanisms. The City created a Brownfields webpage that was used to post fact sheets created for the project. This website will continue to communicate progress related to brownfields redevelopment. As a way to educate the public about the brownfields project and provide information on the process, informational fact sheets—designed to be quickly and easily read by the public—will be produced and will be available on our webpage, at the public library, and at City Hall. The City plans to prepare 2 to 3 additional fact sheets. As stated previously, the City has created a Facebook page that will also be used to communicate redevelopment efforts. Coffeyville does not have a large population of non-English speaking residents (5.04%[5]). If requested, the City will have all informational material translated and provide translators at all public meetings if requested.

Another means of communication that will be used during this process are "town hall" style meetings. These meetings may take place in conjunction with City Council meetings or may be held alone. During the previous brownfields grant three of these meetings were held during the grant period. We believe it is important to communicate our progress through a variety of means—online, in the newspaper, in handouts, and in person—to reach the broadest audience of community members possible. During the previous assessment grant, flyers were sent to each resident in the City to advertise the first public meeting. The meetings may also be used as a "visioning" exercise and may include planning charettes, redevelopment strategies workshops, and youth involvement.

The City also plans to communicate progress of the grant during local community events like "Downtown Coffeyville" and the annual "Dalton Defender Days". This provides the public the opportunity to speak with project leaders in a more informal setting.

[5] www.usa.com website.

V.B.3.b Partnerships with Government Agencies (10 Points)

V.B.3.b.i Partnerships with Local/State/Tribal Environmental and Health Agencies (5 Points)

The City intends to take the lessons learned during the previous assessment grant and capitalize on these relationships. In addition to the partnerships the City has on the local level, Coffeyville has had the opportunity to form vital partnerships with the Kansas Department of Health and Environment's (KDHE) Brownfields program through previous utilization of the program. One of the first Brownfields Targeted Assessments (BTA) conducted through KDHE's Brownfields program was conducted in Coffeyville at the Tal's Drive-In site in 2001. Since that time the City has worked closely with their Brownfields program by communicating progress of the grant, providing copies of grant reports, and requesting additional BTAs when grant funds were not longer available. Since the first BTA conducted through KDHE's program, the City has had five additional BTAs conducted the community. One property has been titled "Coffeyville Animal Shelter" and was conducted prior to construction of the Coffeyville Friends of Animals Shelter. Another more notable BTA was the "Coffeyville Rails to Trails" project that was conducted along the proposed bike/walking path.

The City intends to continue to utilize KDHE's Brownfields program staff as a valuable resource throughout the duration of the project. KDHE will be provided copies of all Phase I and Phase II reports, as well as copied on all Quarterly Reports. If Phase II activities determine that cleanup activities are warranted, the City will encourage enrollment in KDHE's Voluntary Cleanup and Property Redevelopment Program (VCPRP) to eventually receive site clearance through the program.

The City has also developed a partnership with the Montgomery County Health Department for the project. They have agreed to participate in public meetings to address the public's health concerns with the project, if any.

V.B.3.b.ii Partnerships with Other Relevant Federal, State and Local Governmental Agencies (5 Points)

V.B.3.c Partnerships with Community-Based Organizations (10 Points)

In Process

V.B.4 Project Benefits (30 Total Points)

V.B.4.a Health and/or Welfare and Environment (10 Points)

The primary environmental benefits from redevelopment and addressing potential environmental issues in Coffeyville are the reductions of threat to human health and the environment by addressing contamination. The proposed budget expends a majority of the

funds to conduct Phase I and II assessments and will be used to evaluate the existence and potential extent of environmental impacts. Once these impacts are identified, measures to mitigate and remove soil and/or groundwater contamination can be taken. Land owners can use information collected during these investigations to take steps necessary to enter appropriate sites into KDHE cleanup programs.

The EPA Quality Assurance process not only ensures the quality of the data, but also outlines some of the measures to be employed to make sure that workers and nearby residents are protected during field activities. A site-specific health and safety plan will be developed for each property that carefully describes measures taken at each specific site.

As stated previously, the proposed bike/walking trail is located in an area with known lead in soil issues. By identifying properties with elevated lead levels in soil, the threat of elevated blood lead levels to nearby residents will be greatly reduced. By identifying properties that may have been impacted by the former Sinclair refinery due to their adjacent location, potential concerns associated with petroleum impacts will be reduced. Additionally, by identifying and subsequently abating properties in the downtown area identified as containing asbestos and/or lead paint health concerns to worker and/or retail customers will also be reduced.

Sites that are enrolled in KDHE's VCPRP program subsequent to grant activities will ultimately receive a No Further Action Determination document that environmental cleanup activities are complete. Since all reports and work plans submitted under KDHE's VCPRP program require review and oversight, will ensure that activities are through and well documented.

If information derived from Phase II investigations indicates that health monitoring is warranted, the City will work with the Montgomery County Health Department to ensure these activities are completed safely.

V.B.4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse (10 Points)

V.B.4.b.i Planning, Policies, Ordinances or Other Tools (5 Points)

Simply by redeveloping a former rail line into a bike/walking trail is an excellent example of how the community promotes infrastructure reuse. By allowing citizens the opportunity to bike or walk along the trail within our community, we will be reducing automobile emissions that would have been used to drive to these locations. The City will explore potential options to use recycled materials (such as recycled concrete or asphalt) during the construction phase of the proposed trail project.

V.B.4.b.ii Example of Efforts to Integrate Equitable Development or Livability Principles (5 Points)

V.B.4.c Economic or Non-Economic Benefits (long term benefits) (10 Points)

V.B.4.c.i Economic Benefits or Other non-Economic Benefits (5 Points)

As stated previously, the CCEF is a not-for-profit organization designed to facilitate community enhancement within the City of Coffeyville. Several entities have determined the best reuse for the site would be for recreational purposes. The proposed corridor for the bike/walking path is also considered to be a greenspace and includes natural features such as a creek and a wooded area.

V.B.4.c.ii Planned Efforts to Promote Local Hiring and Procurement (5 Points)

Whenever possible, the City will utilize local contractors to the extent that they are available. An example of a brownfields project where this occurred would be the 601 Lewark site that was assessed under the previous brownfields grant. The City utilized a local landfill for disposal, a local excavation contractor to transport roll-off containers, and obtained gravel and fill material from a local source. They City may also contact the Coffeyville Community College and provide temporary employment to college students to pass out informational flyers in target areas.

V.B.5 Programmatic Capability and Past Performance (40 Total Points)

V.B.5.a Programmatic Capability (24 Points)

The City has a strong history of success in managing non-federally and federally funded assistance agreements. We have received several grant awards over the years, including two EPA Brownfields Assessment grants, based in part on our ability to efficiently and effectively administer grant resources.

City staff has extensive experience in aiding contracted professionals in administering grant programs. Mr. Scott Massman was the Brownfield grant administrator for the previous brownfield assessment grants. It is anticipated Mr. Massman will remain in this role for future grant activity.

The City also intends to hire a qualified consulting company (through federal procurement requirements) to assist with Phase I and Phase II environmental site assessments. The environmental consultant will meet the definition of “environmental professional” as defined by EPA’s All Appropriate Inquiry Rule. The City has already been through the federal procurement process to hire a qualified consulting company and the Request for Qualification documents have already been developed. With the framework in place, the hiring process should go smoothly.

V.B.5.b Audit Findings (2 Points)

The City has had no adverse audit findings associated with the previous Brownfields grants or other funds managed by the city.

V.B.5.c Past Performance and Accomplishments (14 Points)

V.B.5.c.i Currently or Has Ever Received an EPA Brownfields Assessment, Revolving Loan Fund, or Cleanup Grant (14 Points)

1. Compliance with grant requirements [7 Points]:

The City previously was awarded two Brownfields Assessment grants. These grants are discussed below.

EPA Cooperative Agreement No. BF97712501 (Hazardous Substances)

The City just completed an EPA Brownfields hazardous substances assessment grant for $200,000. Performance has been as follows:

- Funds Expenditure: Of the $200,000 awarded approximately $175,613 were expended. This is largely due to the popularity of the program late in the grant period. Assessments were requested at the end of the grant period that had to be denied due to time constraints. With smaller communities it is important to take time building trust on the front end of the project.
- Compliance with grant requirements: The City's work plan stressed the requirement for both public involvement in the process as well as the completion of several assessments. The Work Plan stated that two to three public outreach events would be conducted. The City conducted a total of four outreach events during the grant. The City's Brownfield manager personally talked to several property owners about the brownfields project and obtained access to several properties. It was estimated a total of 20 Phase I assessments would be conducted. Although the City did not meet this goal due to time constraints, it is believed these funds would have been expended had the City not had to turn potential assessment properties away due to the ending of the grant. The City estimated a total of six to eight Phase II assessments would be conducted. The City met this goal with eight Phase II sites.
- The schedule followed during the execution of the grant was very similar to or accelerated relative to the Work Plan. MBE/WBE firms conducted approximately 16% of the grant total. All other terms and conditions were complied with.
- Reporting: Quarterly reports were completed on time. Copies of all assessments conducted were provided to EPA in a timely manner.

EPA Cooperative Agreement No. BF97712401 (Petroleum)

The City just completed an EPA Brownfields petroleum assessment grant for $200,000. Performance has been as follows:

- Funds Expenditure: Of the $200,000 awarded approximately $177,809 were expended. As stated previously, momentum was gained late in the grant cycle. It is believed that if there would have been more time these remaining funds would have been expended.
- Compliance with grant requirements: As stated in the discussion above, several public outreach events were held to report progress. These events were designed to promote both grant types. It was estimated that a total of 20 Phase I assessments would be conducted. Although the City did not meet this goal due to time constraints, it is believed these funds would have been expended had the City not had to turn potential assessment properties away due to the ending of the grant. The City estimated a total of six to eight Phase II assessments would be conducted. The City met this goal with six Phase II sites.

- The schedule followed during the execution of the grant was very similar to or accelerated relative to the Work Plan. MBE/WBE firms conducted approximately 18% of the grant total. All other terms and conditions were complied with.
- Reporting: Quarterly reports were completed on time. Copies of all assessments conducted were provided to EPA in a timely manner.

2. Accomplishments [7 Points]:

EPA Cooperative Agreement No. BF97712501 (Hazardous Substances)

- Accomplishments: A site inventory was completed that included the downtown area. A total of eleven Phase I ESAs were completed. Nine Phase II assessments were conducted. One Phase III assessment was completed. The sites assessed have been added to ACRES.

Site	Work Completed	Results/Plans
Coffeyville Garden Apartments	ESA, ESA Update	Property owner has renovated the entire complex for housing.
601 Lewark (comingled HS and Petroleum site)	ESA, Phase II, and Phase III	Site clear for non-residential use. Redevelopment planned as a school bus barn location.
607 W 11th	ESA, Phase II	Site is former dry cleaner and has been referred to KDHE's Dry Cleaning Trust Fund.
1108 E 8th	ESA, Phase II	No cleanup needed. Ready for redevelopment.
Plute Property	ESA	No Phase II needed. Ready for redevelopment.
Merriman Property	ESA	No Phase II needed. Ready for redevelopment.
Reardon Property	ESA, Phase II	No cleanup needed. Site had been sold to another owner for reuse.
900 E 8th	ESA, Phase II	No cleanup needed. Ready for redevelopment.
Haffener Property	ESA, Phase II	Portions of the site above residential lead levels. Submit data to Sherwin Williams for evaluation.
904 Keith	ESA, Phase II	Portion of site above residential lead levels. Referred the project to KDHE's Site Assessment program.
701 Northeast	ESA, Phase II	Gasoline impacts found. Referred to KDHE's Storage Tank Program

EPA Cooperative Agreement No. BF97712401 (Petroleum)

- Accomplishments: A site inventory was completed that included the downtown area. A total of nine Phase I ESAs were completed. Six Phase II assessments were conducted. One Phase III assessment was completed. The sites assessed have been added to ACRES.

Site	Work Completed	Results/Plans
601 Lewark (comingled HS and Petroleum site)	ESA, Phase II, and Phase III	Site clear for non-residential use. Redevelopment planned as a school bus barn location.
607 S Union	ESA, Phase II	Site suitable for non-residential use. Ready for redevelopment.
613 S Union	ESA, Phase II	Site suitable for non-residential use. Ready for redevelopment.
1012 E 10th	ESA, Phase II	No cleanup needed. Ready for redevelopment.
2602 S Walnut	ESA, Phase II	Gasoline impacts found. Referred to KDHE's Storage Tank Program
2622 N 2nd Industrial Drive	ESA	No Phase II needed. Ready for redevelopment.
3303 W 8th	ESA, Phase II	Gasoline impacts found. Referred to KDHE's Storage Tank Program
Meyer Property	ESA	No Phase II needed. Ready for redevelopment.
Whited Property	ESA	No Phase II needed. Ready for redevelopment.

For both grant types the city has met the majority of the outputs discussed in the Work Plan including sending city staff to the national and regional brownfields conferences, completing a site inventory, obtaining a qualified environmental professional, submission of quarterly and annually required reports, and development of fact sheets. Additionally the City submitted copies of the Generic Quality Assurance Project Plan and assessment reports to EPA in a timely manner.

V.B.5.c.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (14 Points): Not Applicable

V.B.5.c.iii Has Never Received Any Type of Federal or Non-Federal Assistance Agreements (7 points) Not Applicable

Assessment Grant Transmittal Letter

IV.C.2.a Applicant Identification
City of Coffeyville
7th & Walnut, P.O. Box 1629
Coffeyville, Kansas 67337
Phone: 620.252.6127 Fax: 620.252.6175

IV.C.2.b Applicant DUNS number

IV.C.2.c Funding Requested

IV.C.2.c.i Grant Type
Assessment

IV.C.2.c.ii Federal Funds Requested
$400,000

IV.C.2.c.iii Contamination
$200,000 Hazardous Substances & $200,000 Petroleum

IV.C.2.c.iv Community-wide, Site-specific, or Coalition Community-wide, Site-specific, or Coalition
Community-wide

IV.C.2.d Location
City of Coffeyville, Montgomery County, Kansas

IV.C.2.e For site-specific proposals site address Not applicable

IV.C.2.f Contacts

IV.C.2.f.i Project Director
Scott Massman, 7th & Walnut, P.O. Box1629, Coffeyville, Kansas 67337
Phone: 620.252.6127 Fax: 620.252.6175
Email:smassman@coffeyville.com

IV.C.2.f.ii Chief Executive/Highest Ranking Elected Official
David George, Mayor, 7th & Walnut, P.O. Box 1629, Coffeyville, Kansas 67337

IV.C.2.g Date Submitted
January 22, 2014

IV.C.2.h Project Period
3 Years from the date of grant award

IV.C.2.i Population

IV.C.2.i.i General Population
10,295 (According to US 2010 Census)

IV.C.2.i.ii Population of Target Area
Not Appcliable – community wide grant application

IV.C.2.j Other Factors Checklist

January 22, 2014

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, Maryland 20910
Phone 301-589-5318

United States Environmental Protection Agency
Attn: Ms. Susan Klein
901 North 5th Street
Kansas City, Kansas 66101
Phone 913-551-7786

Dear Mr. West and Ms. Klein:

The Coffeyville Community Enhancement Foundation is pleased to submit this application seeking $200,000 in cleanup funding for a hazardous substance site in Coffeyville, Kansas. The project is a "rails to trails" project designed to connect two city parks to promote walkability within our community. Currently there are no walking/biking trails within our community that allow community residents, particularly children, to access these parks safely without traveling city streets that are in high traffic areas.

The proposed trail is adjacent to a former smelter/paint manufacturing facility (Sherwin Williams). For over 100 years this facility operated in our community and provided much needed jobs. However, the facility ceased operations in 2013 leaving a legacy of unemployment and environmental issues.

Since the 2007 flood and subsequent oil spill, the City has come a long way in our redevelopment efforts. Many of the properties within the flood area have returned to productive use. Pride in the community is at an all-time high. But there is still a long way to go. Funding of this grant application will do several things for future generations. By both promoting physical activity through use of the biking/walking trail, as well as addressing soil contamination along the former rail bed, the health of the citizens of Coffeyville will be improved.

REQUIRED INFORMATION

a.	Applicant Identification:	Coffeyville Community Enhancement Foundation P.O. Box 1629 Coffeyville, Kansas 67337 Phone: 620.336.2776 Fax: 620.336.2104
b.	Applicant DUNS Number:	04-525-3143
c.	Funding Requested:	i. Cleanup ii. $200,000 iii. Hazardous Substances

d. Location: Coffeyville Community Enhancement Foundation
P.O. Box 1629, Coffeyville, Kansas 67337
Phone: 620.252-6127

e. Property Name/Address: No address available for the site – it is a former rail bed that generally runs north/south from a location west of 4th & Poplar to a location north and west of the intersection of 1st & Poplar in Coffeyville, Kansas 67337

f. Contacts:

i. Project Director

David George, Director Coffeyville Community Enhancement Foundation
P.O. Box
Coffeyville, Kansas 67337
Phone: 620.252.6127 Fax: 620.252.6175
Email: DavidGeorge@coffeyville.com

ii. Chief Executive/Highest Ranking Elected Official:

David George, Mayor of Coffeyville
P.O. Box 1629
Coffeyville, KS 67337
Phone: 620-252-6127
Email: DavidGeorge@coffeyville.com

g. Date Submitted: January 22, 2014

h. Project Period: 3 Years from the date of grant award

i. Population: 9.993 (According an estimate shown in the 2013-2014 Directory of Kansas Public Officials prepared by the League of Kansas Municipalities.)

j. Other Factors Checklist: Attached to Application – Factors identified include: recent natural disaster; community experiencing manufacturing plant closure tied to the project area; mine-scarred land, etc.

Sincerely,

THRESHOLD CRITERIA

1. Applicant Eligibility
   i. Eligible Entity: The Coffeyville Community Enhancement Foundation Inc. (CCEF) has been recognized as a non-profit organization under IRS Code 501(c)(3). A copy of the IRS approval of this status is attached to this application.
   ii. Site Ownership: The CCEF obtained the property on: In Process

2. Letter from the State or Tribal Environmental Authority

3. Site Eligibility and Property Ownership Eligibility

Site Eligibility

a. Basic Site Information: (a) Proposed Bike Path; (b) No address available for the site – it is a former rail bed that generally runs north/south from a location west of 4th & Poplar to a location north and west of the intersection of 1st & Poplar in Coffeyville, Kansas 67337; (c) City of Coffeyville; (d) will obtain ownership by January 2014.
b. Status and History of Contamination at the Site: (a) contaminated by hazardous substances; (b) the site was historically used as a rail line from the 1800's until use of the line was discontinued by the railroad in 1982; (c) lead, cadmium, arsenic, and zinc contamination in shallow soils; the site is adjacent to a former smelter/manufacturing facility. It is assumed site became contaminated due to wind-blown particles and through rail line activity. Sampling has been conducted along the rail line indicating metals contamination in both shallow and subsurface soil.
c. Sites Ineligible for Funding: (a) the site is not on the NPL; (b) the site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; (c) the site is not subject to the jurisdiction, custody, or control of the US government.
d. Sites Requiring a Property-Specific Determination: The site does not require a Property-Specific Determination.
e. Environmental Assessment Required for Cleanup Proposals: During an investigation that was conducted in 1993 for the adjacent Sherwin-Williams facility, 81 surface soil samples and fifteen (15) subsurface soil samples were collected along the site. Soil samples collected during this effort indicate soil along the site to be contaminated with arsenic, cadmium, lead, and zinc above Kansas residential and non-residential standards.

Property Eligibility

a. CERCLA §107 Liability: CCEF is eligible for bona fide prospective purchaser protection (BFPP) because the following BFPP requirements have been met:
   i. Disposal of hazardous substances at the site occurred before CCEF took ownership of the site on "in process".
   ii. CCEF is not liable for the contamination at the site and is not affiliated with a responsible party.
   iii. A Phase I ESA compliant with the ASTM 1527-05 standard was completed on November 27, 2013, prior to ownership of the site by CCEF.

iv. CCEF will take appropriate care regarding any hazardous substance that have been found at the site and to prevent future releases.
v. CCEF will cooperate with authorized response persons in the event of discovery or release of hazardous substances to the site.
vi. CCEF will comply with any land-use restrictions associated with response actions at the site.
b. Enforcement or Other Actions: None
c. Information on Liability and Defenses/Protections: In Process
i. Information on the Property Acquisition: In Process
ii. Timing and/or Contribution Towards Hazardous Substances Disposal: Contamination identified at the site occurred prior to X, when CCEF acquired the property. CCEF has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
iii. Pre-Purchase Inquiry: A Phase I ESA compliant with the ASTM 1527-05 standard was completed on November 27, 2013, for KDHE through their brownfields program for CCEF. The ESA was conducted by Terracon under the direction of Bridget Broderick who meets the definition of an environmental professional under AAI. The ESA was conducted prior to CCEF obtaining the property.
iv. Post-Acquisition Uses: The site has remained vacant since CCEF acquired the property.
v. Continuing Obligations: The site is currently vacant and covered with a vegetative cover. This assisted in preventing exposure to hazardous substances and preventing future releases. Access to the site is restricted by a locked fence preventing trespassers from accessing the property. CCEF will: comply with land-use restrictions and institutional controls; assist and cooperate with those performing the cleanup and provide access to the property; comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

4. Cleanup Authority and Oversight Structure: It is CCEF's intent to enroll the site in the KDHE Voluntary Cleanup and Property Redevelopment Program (VCPRP). CCEF will also obtain the services of an environmental consultant through a competitive process compliant with 40 CFR Part 30.
5. Cost Share: In process
6. Community Notification: A copy of this draft proposal as well as a copy of the draft Analysis of Brownfields Cleanup Alternatives (ABCA) were made available to the Coffeyville Library on 1/8/2014. A public notice announcing this availability was posted on 1/8/2014. CCEF also requested and was granted approval to place the documents on the City of Coffeyville's webpage. CCEF requested to be on the agenda of the City of Coffeyville's council meeting on 1/14/2014 to discuss this grant application and the proposed ABCA. A public meeting will be held to discuss these.

RANKING CRITERIA

1) COMMUNITY NEED

Coffeyville was originally established as a trading and commercial city and through the years it has never lost that character. The city was incorporated in March, 1872, but the corporation was found to be illegal and it was again incorporated in March, 1873. During the last thirty years of the 19th Century, it steadily grew and flourished as a trading center of a rich and prosperous farming region. Moreover, it came to be known as one of the most important grain and flour milling points to the Central West.

Around 1900, the progressive businessmen of Coffeyville recognized the possibilities of the proximity of deposits of clay, sand and shale, together with natural gas as a fuel. Within the next few years their efforts brought to Coffeyville eight glass factories and five brick and tile plants as well as the former Ozark Zinc Smelter (located adjacent to the west of the site). The result was rapid expansion into an

industrial city. In 1901, as a trading city, Coffeyville had a population of 5,000. By 1910, as an industrial city as well as a trading city, its population had increased and continued to increase for the next five years to 18,500. By 1916, the glass factories had closed their doors. At that time Coffeyville did, however, have a number of industries that are still active today: Rea Patterson Flour Mill (Bartlett Flour Mill), and the National refinery (Coffeyville Resources Refining and Marketing, LLC)[1]. Brick plants operating in the late 1890's and early 1900's included the Standard Brick Company, Vitrified Brick Company, Yoke Brick Company. When the plants were running at full speed, some 765,500 bricks were manufactured every day and shipped all over the world. Of the glass plants operating in the early 1900's, names that would be recognizable today include Ball Brothers Glass Factory and Mason Fruit Jar Company. These were just some of the factories that employed over 1,000 people. The factories closed in 1916, leaving over 1,000 people unemployed. In 1913 the Sinclair Refinery was opened in a portion of a section that was served by the railroad spur as shown for our proposed trail map. The Sinclair Refinery operated on approximately 210 acres. The property was acquired then by Atlantic Richfield Company (ARCO) in 1969, and was later determined the subject property was in need of an environmental cleanup. KDHE issued its final corrective action decision in August of 2000.

The community has experienced a slow and steady population decrease since 1960 when the population of the community was at the peak of 17,382 residents in the community.

a. Targeted Community and Brownfields proposed railroad spur cleanup. The area targeted is a railroad spur used to service the Sinclair Refinery and Sherwin Williams Paint Manufacturing Plant. Housing in the area was built for the employees of these facilities which could be considered blue collar. It is already known that there are high levels of lead, cadmium, and other substances have been determined. This neighborhood could benefit by having a trail that links two of the City of Coffeyville's parks. The proposed trail is located in the Northwest Quarter of the Southeast Quarter and a portion of the Northeast Quarter of Section 34, Township 34 South, Range 16 East of the 6th Principal Meridian, Montgomery County, Kansas. This corridor will provide connectivity and improve the health of our citizens as well as providing a safer means of travel for our youth.

i) Targeted Community

The target community for the purposes of this project are the neighborhoods within Census Tract 9511 and 9508. These neighborhoods feed the area of the proposed rails to trails project. It should be noted that Census tract 9508 covers the entire west side of Coffeyville and only approximately 1/10th of the tract is within the target area. The primary industry in these census tracts is the former Sherwin Williams facility. It is estimated this facility provided jobs for 370 people (many from these census tracts) prior to the facility closing in 2013. However it should also be noted that the southern end of the proposed path originates from the Community Elementary School which serves the city as a whole. According to the Kansas State Department of Education Report Card 2013-2013 for the Community Elementary School, 77.24% of the children attending this school are considered to be economically disadvantaged. Of the total 1081 students in this school, 48.1% are white, 15.45% are Hispanic, 11.9% are black, and 24.5% are considered "other". The dropout rate for the school district was 2.5% in 2012, above the state average of 1.4%.

The neighborhoods surrounding the proposed bike trail consists of many low income housing units. As stated previously, the Community Elementary School is located at the southwest portion of the project. Approximately 12.6% of the population in Census tract 9511 and 12.3% of the population in Census tract 9508 are between the ages of 5 and 14[2]. Furthermore, the City of Coffeyville does not have a public transportation system so citizens in this area have no way of travel to parks, and the business area located to the south of the project except to travel along busy streets.

---

[1] *"Early Coffeyville History", City of Coffeyville website, 2013.*

[2] *Population information provided by www.usa.com website, 2013.*

In the early 1990's the former Sherwin Williams facility conducted sampling at many residential yards within the target area. Based upon criteria developed as part of the facilities RCRA permit, soil removals were conducted at many residential yards based on site specific cleanup levels demonstrating a long history of health exposures to the residents within this target area.

ii) Demographic Information

	Census Tract 9508[1]	**Census Tract 9511**	**Coffeyville**	**Kansas**	**National**
Population[2]	4,871	2,762	9,993	2,853,118	308,745,538
Unemployment[3]	N/A	N/A	14.5%	5.6%	7.3%
Poverty Rate	8.2%	11.7%	17.4%	12.6%	14.3%
Percent Minority[2]	16.3% (non-white)	16.4% (non-white)	25.8% (non-white)	14.8% (non-white)	26.7% (non-white)
Median Household Income[2]	$46,907	$34,552	$33,964	$50,594	$52,762
Per Capita Income[2]	$23,161	$19,518	$18,575	$26,545	$27,915
House Value[2]	$83,200	$49,700	$54,900	$126,500	$186,200

1 – This tract covers approximately ½ of the greater Coffeyville area and only about 10% of the tract is in the target area.
2 - Data is from the 2010 US Census data available at www.census.gov, viewed December 2013, except the population of Coffeyville which was taken from an estimate shown in the 2013-2014 Directory of Kansas Public Officials prepared by the League of Kansas Municipalities.
3 – Data from Bureau of Labor Statistics available at www.bls.gov, viewed December 2013

The above table illustrates the tough economic situation of Coffeyville and the target area. Although the percentage of minorities within the target area is below the national average, they are above the average for the State of Kansas. Of particular note is the disparity of the median household income and per capita income for the two census tracts that make up the target area. In both cases the census tracts are below both the state and national average. Although the average house value for census tract 9508 is significantly higher than census tract 9511, this is likely due to the large geographic area the census tract encompasses, only 10% of which is in the target area. Lastly, the unemployment rate for Coffeyville as a whole is higher than both the state and national average. This is likely due to the recent closures of many facilities in Coffeyville which includes the adjacent former Sherwin Williams facility.

iii) Brownfields

The brownfield property to be cleaned up under this grant is a former railroad property that is immediately east of the former Sherwin Williams industrial facility. The former industrial facility has been

under a RCRA order but the site is not included within that order. Like many brownfields properties, simply being located adjacent to this industrial facility has caused an impact.

The rail line the site is situated on was originally constructed in the late 1800's as the Atchison Topeka and Santa Fe Railroad. This particular portion of the rail line serviced what was once the former Ozark Smelter and later became the former Sherwin Williams industrial facility. Once the rail line became inactive, the Missouri Pacific Railroad Company (the owner at the time) deeded to property to the City of Coffeyville on December14th 1992 as recorded in Book 391, Page 651 in the Montgomery County Register of Deeds office.

As part of the investigation conducted in 1993/1994 by the former Sherwin Williams facility, surface and subsurface soil samples were collected and analyzed for arsenic, barium, cadmium, lead, and zinc. Samples were also collected from the drainage ditches that cross the site. Based on this data, the entire length of the site along the former rail line exceeds the site specific standards associated with the Sherwin Williams site – primarily with lead. Lead affects adults and children in different ways. High lead levels in children may result in nervous system and kidney damage; learning disabilities, attention deficit disorder, and decreased intelligence; speech, language and behavior problems; poor muscle coordination; decreased muscle and bone growth; hearing damage; and seizures, unconsciousness, and death. High levels of lead in adults may cause increase change of illness during pregnancy; harm to a fetus; high blood pressure; digestive problems; nerve disorders; memory and concentration problems; and muscle and joint pain. As a preventative measure designed to keep people away from the site, two fences were installed that enclose the site. These fences are approximately 6 feet high and locked at all times. Although this is an effective measure to keep people away from the site, it has essentially allowed this property to lay dormant. The proposed cleanup will encapsulate contaminated materials (which prevents human exposure better than simply fencing the property) and allows the site area to be used for recreational purposes.

iv. Cumulative Environmental Issues

In addition to the former Sherwin Williams facility, it should be noted that immediately northeast of the site lies one of the City's electrical substations. According to the Scorecard website (a pollution information website), there are ten industrial facilities on the toxic release inventory and five point sources of air pollution in the City of Coffeyville. During the Phase I Environmental Site Assessment conducted prior to CCEF's ownership of the property, one RCRA generator, two brownfields, two leaking underground storage tank (LUST), four state hazardous waste sites, and one solid waste facility were identified to be in the vicinity of the site.

Additionally, the distribution of environmental burdens for Montgomery County (which includes both Coffeyville, and the target site) does not illustrate equitable distribution of these environmental burdens by race/ethnicity, income, or poverty. The ratio of people of color versus whites for releases of toxic chemicals is 1.36 and for facilities emitting criteria air pollutants is 1.38. The distribution of burdens by income is 1.1 (low/high income) for releases of toxic chemicals and 1.59 (low/high) for facilities emitting criteria air pollutants.

b. Impacts on Targeted Community

As previously discussed, many families in the target area have incomes below both the per capita and median household incomes for both the State of Kansas as well as the national average. According to the www.scorecard.com website, 6% of the houses in Montgomery County have a high risk of lead hazards. Although this study focuses on lead-paint, the would be impossible to separate blood levels that are elevated due to air-born dust from blood lead levels due to lead paint inhalation. The website also indicates that Montgomery County ranks 3rd in the state of the counties with the greatest reported releases of lead to air (with 210 pounds). For Census tract 9508, the website indicates 2.4% of the

housing units have a high risk of lead hazards. This percentage is higher for Census tract 9511 at 8.7%. By the websites calculations, 40% of the children under the age of 5 were living below poverty in tract 9511 and 29% in tract 9508.

Although the site is fenced and not accessible, it is possible trespassers or city workers currently mowing the site would be exposed since the soil material itself is not encapsulated.

c. Financial Need

i) Economic Conditions: In Process

ii) Economic Effects of Brownfields: In Process

2) PROJECT DESCRIPTION and FEASIBILITY OF SUCCESS

Project Description

i) Existing Conditions

The site is the location of a former rail line. The site is currently fenced of and much of the former rail line has been covered with either fill dirt or vegetation. The proposed project will include removal of the rail line and associated railroad ties. No buildings will need to be demolished to complete the project. As stated previously, environmental sampling efforts indicate that surface and subsurface soil at the site has been impacted with metals (specifically lead) above cleanup levels across the entire length of the rail line associated with the site.

Not only will the proposed project prevent potential environmental exposures associated with the site, it will encourage connectivity between two major parks for the city as well as promote health for our citizens through physical activity.

Proposed Cleanup Plan

As part of the Draft Analysis of Brownfields Cleanup Alternatives (ABCA) three alternatives were evaluated. A copy of the draft ABCA is attached to this proposal. The alternatives included 1) no action; 2) soil removal; and 3) soil encapsulation.

As part of the “no action” alternative, the overall environmental condition of the site as well as costs and feasibility were evaluated. This option allows for leaving the site as is and is an economical option because the only costs associated with this option involve mowing and maintaining the existing fence. However, this option was decided not to be feasible because although access to the site is restricted, there is still the possibility for trespassing as well as human exposure through wind born dust. Additionally, this option does not provide a productive reuse of the property.

The “soil removal” option provides a very effective cleanup since no remaining contaminated soil material would be left in place. It would allow for “unrestricted use” of the property. However, disposal of this contaminated soil material was extremely expensive and this alternative was determined not to be a feasible option based on cost.

The final option evaluated allows for “soil encapsulation” as part of the construction for the proposed bike/walking path connecting the Community Elementary School to the southwest with the Pfister Park to the north. Although this option does not allow for removal of lead impacted soil, it essentially “caps” the material with an asphalt or concrete cap preventing human exposure to this material. The CCEF plans to coordinate these activities with the construction of the proposed bike/walking trail to reduce

expenditures. Although more costly than the “no action” alternative, this option allows for recreational reuse of the property. This option was also determined to be much less costly than the “soil removal” option. Based on proposed redevelopment plans, costs, and site feasibility, this option was selected as the preferred cleanup option.

To implement this option, CCEF plans to enroll the site into the Kansas Voluntary Cleanup and Property Redevelopment Program (VCPRP) to ensure the cleanup implemented at the site meets state guidelines. For the preferred cleanup option it is anticipated that an Environmental Use Control (EUC) will be placed on the property preventing future excavations in the “capped” area.

b) Tasks and Budget Table

Task Descriptions

Task 1 – Outreach

A Voluntary Cleanup Plan will be prepared and submitted for KDHE approval. Part of the VCPRP process allows for public review and comment of the plan. At a minimum the document will be made available through the Coffeyville Public Library. If public comment warrants, the VCPRP allows for comments to also be addressed through a public meeting. The public meeting would be intended to discuss community concerns regarding exposure, noise, and/or dust. CCEF’s qualified environmental consultants will assist with the preparation of this document as well as public outreach.

Task 2 – Cleanup Planning

This task allows for costs associated with potential additional sampling for the purposes of cleanup planning. CCEF’s environmental consultant will prepare a Sampling and Analysis Plan (and Quality Assurance Project Plan) detailing the protocol for these additional sampling activities.

This task will also include the development of a Voluntary Cleanup Plan for KDHE’s VCPRP review and approval. It is anticipated that the KDHE VCPRP fee will be included in this task.

Task 3 – Remedial Activities

Costs associated with this task will include costs for necessary soil movement as well as asphalt and/or concrete needed to encapsulate contaminated soil at the site. Encapsulation will be need to make the site ready for redevelopment.

Task 4 – Voluntary Cleanup Report & Environmental Use Controls

Once the Voluntary Cleanup has been completed, CCEF’s environmental consultant will prepare the Voluntary Cleanup Report for KDHE review and approval. It is likely that an Environmental Use Control will be required subsequent to the cleanup activities. The submittal of the application and associated fee are included in this task.

Budget Detail					
Budget Categories	**Project Tasks**				
	Task 1	**Task 2**	**Task 3**	**Task 4**	**Totals**
Personnel					
Fringe Benefits					

Travel	$3,000.00				
Supplies	$500.00				
Contractual	$4,000.00	$15,000.00	$15,000.00	$7,000.00	
Total Federal Funding (not to exceed $200,000)	$7,500.00	$15,000.00		$7,000.00	
Cost Share					
Total Budget					

ii) Ability to Leverage

3) COMMUNITY ENGAGEMENT & PARTNERSHIPS

a. Plan for Involving Targeted Community & Other Stakeholders; and, Communicating Project Progress

Borrowing from the success the City of Coffeyville recently had associated with community involvement with their Brownfields assessment grants, CCEF plans to follow a similar model. We will regularly communicate the progress of the brownfield redevelopment projects in the community and target area through a number of different mechanisms. First, as stated previously, the public will be able to review and comment on the Voluntary Cleanup Plan. In order to residents of the target area know this is available, a post card announcing the availability of the document for their review will be sent to individuals located in the target area. The City of Coffeyville has also agreed to post the document on their website for review.

In an effort to engage the community through social media, a Facebook page will be created to discuss progress of the project as well as post any fact sheets that will be created. At this time it is anticipated that two facet sheets will be created for the project.

Partnerships with Government Agencies

CCEF plans to leverage many existing relationships the City of Coffeyville developed during their Brownfields Assessment grant. CCEF contacted the Kansas Department of Health and Environment (KDHE) prior to obtaining the property and a Phase I Brownfields Targeted Assessment (BTA) was conducted through their Brownfields program as part of CCEF's due diligence. CCEF intends to continue to utilize KDHE's Brownfields program staff as a valuable resource throughout the duration of the project. As stated previously, the site will be enrolled in KDHE's VCPRP to eventually receive site clearance through the program.

In addition to the relationship developed with KDHE, CCEF also intends to leverage our relationship with the City of Coffeyville. The City has agreed to host community notification announcements on their website. Since CCEF has not managed a brownfields grant previously, CCEF intends to set up a contractual relationship with the City to manage the fiscal aspects of the grant.

CCEF has also developed a partnership with the Montgomery County Health Department for the project. They have agreed to participate in public meetings to address the public's health concerns with the project, if any.

c. Community-Based Organizations

4) PROJECT BENEFITS

Welfare and/or Public Health

The primary benefit of addressing contamination at the site is greatly reducing the risks to human health in the target community. As stated previously, the site is known to be contaminated with heavy metals – specifically lead. Contaminated surface soil is currently exposed with access to the site restricted by a locked fence. The proposed environmental cleanup will encapsulate the contaminated soil material that will be encapsulated with an asphalt or concrete cap. The residents in Census tracts 9508 and 9511 will no longer be exposed to potential wind blown dust emanating from the site.

The KDHE VCPRP process not only ensures the quality of the data, but also outlines some of the measures to be employed to make sure that workers and nearby residents are protected during field activities. A site-specific health and safety plan will be developed that carefully describes measures to be taken.

The site will ultimately receive a No Further Action Determination document that environmental cleanup activities are complete. Since all reports and work plans submitted under KDHE's VCPRP program require review and oversight, will ensure that activities are through and well documented.

In addition to the environmental health benefits, it is important to note that the future reuse of the site is as a bike/walking path that connects two parks and an elementary school. This reuse will also promote walkability and livability in our community and encourage heart healthy behavior.

b. Infrastructure Reuse/Sustainable Reuse

i.) Planning, Policies, or Other Tools

Simply by redeveloping a former rail line into a bike/walking trail is an excellent example of how the community promotes infrastructure reuse. No buildings will require demolition for construction of the trail and the path has already been fenced off and established. By allowing citizens the opportunity to bike or walk along the trail within our community, we will be reducing automobile emissions that would have been used to drive to these locations. CCEF will explore potential options to use recycled materials (such as recycled concrete or asphalt) during the construction phase of the project.

ii) Example of Efforts

c. Economic and Community Benefits

i) Economic or Other Benefits

As stated previously, the CCEF is a not-for-profit organization designed to facilitate community enhancement within the City of Coffeyville. Several entities have determined the best reuse for the site would be for recreational purposes. The proposed corridor for the bike/walking path is also considered to be a greenspace and includes natural features such as a creek and a wooded area.

ii) Job Creation Potential: Partnerships with Workforce Development Programs

For construction and environmental cleanup activities for the site, CCEF will utilize local contractors to the extent that they are available.

5) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

Additionally, CCEF will obtain a qualified environmental professional (as defined by All Appropriate Inquiry) to oversee the site through the KDHE VCPRP process. The environmental professional will be obtained through federal procurement procedures.

b. Audit Findings

c. Past Performance and Accomplishments

Draft Analysis of Brownfield Cleanup Alternatives
In Support of EPA Brownfield Cleanup Funding Proposal
(Hazardous Substances)
Coffeyville Bike/Walking Trail
Coffeyville, Kansas
January 8, 2014

APPROVALS:

Cleanup Grant Applicant Representative / Coffeyville Community Enhancement Foundation	Date

CONTENTS

1.0 Introduction and Background 2
1.1 Site Location, Description and History 3
1.2 Site Assessment Findings 3
2.0 Project Goal and Re-use Plan 4
3.0 Applicable Regulations and Cleanup Standards 4
4.0 Evaluation of Cleanup Alternatives 4
4.1 Cleanup Alternatives Considered 4
4.2 Alternative 1: Excavation with Asphalt/Concrete Trail and Landscaped Soil Cover 5
4.2.1 Effectiveness 5
4.2.2 Implementability 5
4.2.3 Cost 5
4.3 Alternative 2: 24-inch Excavation, Partial Asphalt Cover, Partial Seeding 5
4.3.1 Effectiveness 6
4.3.2 Implementability 6
4.3.3 Cost 6
4.4 Alternative 3: 12-inch Excavation, Partial Asphalt or Concrete Cover, Partial Seeding 6
4.4.1 Effectiveness 6
4.4.2 Implementability 7
4.4.3 Cost 7
4.5 Alternative 4: In-Place Chemical Stabilization 7
4.5.1 Effectiveness 7
4.5.2 Implementability 7
4.5.3 Cost 8
4.6 Alternative 5: No Action 8
4.6.1 Effectiveness 8
4.6.2 Implementability 8
4.6.3 Cost 8
5.0 Recommended Cleanup Alternative 8
6.0 Methods of Estimating Cost 9

1.0 INTRODUCTION AND BACKGROUND

This Draft Analysis of Brownfield Cleanup Alternatives (ABCA) is in support of a proposal application for United States Environmental Protection Agency (EPA) Brownfield Cleanup grant funding to address hazardous substances in the form of heavy metals (specifically arsenic, barium, cadmium, and lead) in response to community concerns. The Coffeyville Community Enhancement Foundation (CCEF) is evaluating use of EPA Brownfield Cleanup grant funds to address public citizen concerns relative to construction of the Coffeyville Bike/Walking Trail as a walking and biking trail to connect two City parks. The proposed walking/biking amenity generally follows the former Missouri Pacific Railroad. This trail is adjacent to a site previously cleaned up under corrective actions by the EPA and was known as the Sherwin Williams site (EPA ID # KSD007163355).

A comprehensive investigation of the soil along the rail line was conducted as part of the activities for the Sherwin Williams site. The results of the investigation indicated the entire length of the rail line currently owned by CCEF to be above regulatory cleanup levels. As a preventative measure to reduce human exposure to surface soils at the site, Sherwin Williams enclosed the site area with a fence. The data of that report provided the basis for this Draft ABCA.

In evaluating the re-use of the area for community betterment and as part of a conceptual biking/walking trail plan, CCEF desires to utilize the property for recreational purposes which will require a more effective preventative measure to reduce human health exposures to the site.

Funding guidance requires the applicant to provide the community with notice of its intent to apply for an EPA brownfields cleanup grant and allow the community an opportunity to comment on the draft proposal. This public notice was made and a public meeting is to be held in conjunction with the City Commission meeting on January 14, 2013.

The EPA Brownfield Cleanup funding proposal must include, as an attachment, a draft ABCA which briefly summarizes information about the site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup. The draft ABCA should also include information on the effectiveness, the ability of the grantee to implement each alternative, the cost of each proposed cleanup alternative and an analysis of the reasonableness of the various cleanup alternatives considered, including the one chosen. The draft 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 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 and preliminary cost/benefit analyses. Specific cleanup alternatives and associated recommendations are presented in the applicable sections of this report.

1.1 Site Location, Description and History

In recent years, the City of Coffeyville has experience a rebuilding period after the flood in 2007 and subsequent oil spill. Many areas on the east side of our community have been revitalized leaving the center and western portions of our community behind. CCEF feels the time for the proposed bike/walking trail has come.

The site is the location of the former Missouri Pacific Railroad that provided service originally to the Ozark Smelting and Mining facility (and later the Sherwin Williams facility) located immediately adjacent to the site to the west. The rail line was discontinued from use in 1982. As part of a RCRA Corrective Action project for Sherwin Williams, the former rail line (which the site is a part of) was sampled during an RCRA Facility Investigation/Remedial Investigation (RFI). A total of 17 surface soil samples and five (5) subsurface soil samples were collected along the portion of the rail line associated with the site. These data illustrate surface soil to be contaminated with lead, cadmium, barium, and arsenic above Action levels.

1.2 Site Assessment Findings

Two separate assessments were conducted for the site.

<u>RFI Sherwin Williams Facility</u>
As discussed previously, surface and subsurface soils were analyzed as part of the RFI for the adjacent Sherwin Williams site. As part of this investigation, seventeen (17) surface soils, five (5) subsurface soil samples, and four (4) drainage ditch samples were collected and analyzed for arsenic, barium, cadmium, lead, and zinc.

Lead detections in the surface soil samples collected on the site ranged between 1,560 and 17,800 milligrams per kilogram (mg/kg), above the action level of 400. Arsenic detections in surface soil exceeded the action level of 80 mg/kg at eleven locations. Arsenic concentrations ranged between 25.4 and 192 mg/kg. The action level for barium of 4,000 mg/kg was exceeded at one location (with a detection of 5,580 mg/kg). Cadmium action levels were exceeded at fifteen locations with concentrations ranging between 17.9 and 348 mg/kg (action level is 40 mg/kg). There was no action level establish for zinc during the RFI.

The subsurface samples were collected to a depth of 12 to 18 inches below ground surface. Arsenic, barium, cadmium, and zinc were not detected in these samples at concentrations that exceed their action levels). Concentrations of lead at these five subsurface locations ranged between 16.3 and 890 mg/kg. The sample collected from RR-SB-05 was above the site specific action level for lead. The remaining subsurface samples were below this action level.

Samples were also collected from four drainage ditches along the site. Lead was detected at levels exceeding the action level in all for soil samples collected from the drainage ditches at concentrations ranging between 5,350 and 12,400 mg/kg. Arsenic was detected in the four samples at concentrations ranging between 175 and 391 mg/kg, exceeding the action level of 80 mg/kg. The action level for barium

(4,000 mg/kg) was exceeded in three of the samples and for cadmium (40 mg/kg) were exceeded in all four of the ditch samples.

In order to restrict access to the site and protect nearby residents, Sherwin Williams "double fenced" the area, both on the west side of the site to prevent access to the Sherwin Williams property and on the east side to prevent access to the former railroad.

Environmental Site Assessment

Prior to acquiring the property in January 2014, CCEF requested that a Phase I Environmental Site Assessment (ESA) be conducted through the Kansas Department of Health and Environment's (KDHE) Brownfields Targeted Assessment (BTA) program. As part of this assessment the following Recognized Environmental Conditions (RECs) were identified:

- Potential releases associated with the railroad tracks located on site.
- Potential releases associated with historical activities with the west adjoining property (Sherwin Williams Co.).
- Documented soil contamination of lead and arsenic located on site.

2.0 PROJECT GOAL AND RE-USE PLAN

The CCEF in conjunction with the City of Coffeyville has developed a plan to convert the existing site into a portion of a biking/walking trail that will connect the Community Elementary School with Pfister Park to the north.

The site currently fenced of and much of the former rail line has been covered with either fill dirt or vegetation. The proposed project will include removal of the rail line and associated railroad ties. Environmental sampling efforts indicate surface and subsurface soil at the site has been impacted with metals (specifically lead) above cleanup levels across the entire length of the rail line associated with the site. The proposed project will mitigate potential exposure of these chemicals to the community. Not only will the proposed project prevent potential environmental exposures associated with the site, it will encourage connectivity between two major parks for the city as well as promote health for our citizens through physical activity.

3.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

Funding would be to provide an engineered barrier and vegetative cover consistent with remedial design and implementation within the State of Kansas voluntary cleanup program.

4.0 EVALUATION OF CLEANUP ALTERNATIVES

4.1 Cleanup Alternatives Considered

To address hazardous substances at the Site, three different alternatives were considered. These alternatives are outlined below. The following subsections present each alternative in greater detail,

including estimated costs and potential contingency items.

- **Alternative 1: 24-inch Excavation, Off-site Disposal, Backfill & Reseeding**
- **Alternative 2: 24-inch Excavation, Partial Asphalt Cover**
- **Alternative 3: 12-inch Excavation, Partial Asphalt Cover**
- **Alternative 4: 24-inch Chemical Stabilization**
- **Alternative 5: No Action**

4.2 Alternative 1: Excavation with Asphalt/Concrete Trail and Landscaped Soil Cover

This alternative provides removal of identified contaminated soils and provides a clean separation barrier of public users of resulting greenspace from potentially unknown residuals deeper than identified. Alternative provides for the excavation of a 24-inch deep, 25-feet wide buffer zone approximately 1,640 feet in length along the general alignment tested and reported previously. Removed materials are assumed, on the basis of available testing data, to be suitable for disposal off-site at a subtitle D Landfill facility located in Cherryvale, Kansas. The 25-foot wide buffer zone will be backfilled with imported 'clean' soil and seeded.

4.2.1 Effectiveness

Heavy metal contaminants as arsenic, barium and cadmium are permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that could produce unacceptable public risk. With removal and off-site disposal of contaminants, the approach requires no special post-remedy institutional or land use controls for the property as the buffer zone. This alternative does create waste generation stream and associated secondary environmental liabilities for generator.

4.2.2 Implementability

This alternative is technically achievable. 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 stone/gravel materials for cover are readily available in the local area. A labor force readily exists in Kansas to accomplish the remedy. The implementation period is shorter-term.

4.2.3 Cost

RACER costs modeled in a range of $270,000 direct cost to $275,000 as marked up sub-contracted costs to implement.

4.3 Alternative 2: 24-inch Excavation, Partial Asphalt Cover, Partial Seeding

This alternative provides removal of identified soils to a depth of 24-inches and provides a clean separation barrier of public users as asphalt pathway and soil backfill. Alternative provides for the excavation of a 24-inch deep, 25-feet wide buffer zone. From planning maps this was scaled for as approximately 1,640 lineal feet, plus or minus. Removed materials are assumed on the basis of previous

Phase II assessment testing to be suitable for disposal off-site at a subtitle D Landfill facility in Cherryvale, Kansas. Center portion of the treatment area will consist of a 10-feet wide area backfilled with engineered sub-base materials supporting a 2-inch asphaltic concrete cover that has beneficial reuse as a walking or bike path connector. Except for the 10-feet wide cover, balance of backfill will be imported 'clean' soil fill. Non-asphalt areas of backfill will be seeded but does not include actual landscaping.

4.3.1 Effectiveness

Heavy metal contaminants are permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. With removal and off-site disposal of contaminants, the approach requires no special post-remedy institutional or land use controls for the property as the buffer zone. This alternative creates a waste generation stream and associated secondary environmental liabilities for generator.

4.3.2 Implementability

This alternative is technically achievable. It is a mature remedy common in the remediation industry. The approach requires construction equipment readily available in the local demolition and engineering markets. A specialized labor force exists in Kansas to accomplish the remedy. The implementation period is shorter-term.

4.3.3 Cost

RACER costs modeled in a range of $270,000 direct cost to $ 376,000 as marked up sub-contracted costs to implement.

4.4 Alternative 3: 12-inch Excavation, Partial Asphalt or Concrete Cover, Partial Seeding

This alternative provides removal of identified soils to a depth of 12-inches and provides a clean separation barrier of public users as asphalt pathway and soil backfill. Alternative provides for the excavation of a 12-inch deep, 25-feet wide buffer zone. From planning maps this was scaled for as approximately 1,640 lineal feet, plus or minus. Removed materials are assumed on the basis of previous Phase II assessment testing to be suitable for disposal off-site at a subtitle D Landfill facility located in Cherryvale, Kansas. Center portion of the treatment area will consist of a 10-feet wide area backfilled with engineered sub-base materials supporting a 2-inch asphaltic concrete cover or a 4-inch concrete with wire mesh reinforced cover that has beneficial reuse as a walking or bike path connector. Except for the 10-feet wide asphalt/concrete cover, balance of backfill will be imported 'clean' soil fill. Non-asphalt/concrete areas of backfill will be seeded but does not include actual landscaping.

4.4.1 Effectiveness

A considerable portion of heavy metal contaminants are permanently removed, some remain but are

managed in-place. This approach is technically effective as a definitive and direct physical elimination of near-surface contaminants that produce unacceptable public risk. With removal and off-site disposal of contaminants and separation from public exposure to residuals using clean fill separation, the approach may require post-remedy institutional or land use controls for the area. This alternative creates a waste generation stream and associated secondary environmental liabilities for generator.

4.4.2 Implementability

This alternative is technically achievable. It is a mature remedy common in the remediation industry. The approach requires construction equipment readily available in the local demolition and engineering markets. A specialized labor force exists in Kansas to accomplish the remedy. The implementation period is shorter-term.

4.4.3 Cost

RACER costs modeled in a range of $181,000 direct cost to $ 243,000 (asphalt) or $213,000 to $316,000 (concrete) as marked up sub-contracted costs to implement.

4.5 Alternative 4: In-Place Chemical Stabilization

Alternative 4 is an in-place technology that uses both natural and man-made stabilizing agents to 'lock up' chemicals in the surface soils. The chemicals analytically do not leach or volatilize. The approach is less suitable to a long linear project of shallow depth that requires either constant movement of the stabilizing plant/augers or trucking material to and from a single stationary plant location, thereby adding additional cost. This alternative may require compatibility testing with landscaping in the non-pathway buffer zone if used as a greenway or greenspace. This approach does not provide for an engineered barrier that could have secondary reuse as a walking/biking path.

4.5.1 Effectiveness

The contaminants are not permanently removed. This approach is marginally technically effective as future weathering and regeneration of bound materials, although making contaminants not available for exposure, will still leave contamination on site within the public buffer zone. Without removal and off-site disposal of contaminants, the approach may require special inspections and post-remedy institutional or land use controls for the property not included in draft remedy cost models.

4.5.2 Implementability

This alternative is technically achievable. It is a marginal remedy although common in the remediation industry. The approach requires specialized equipment not readily available in the local construction equipment markets. A specialized labor force exists in Kansas to accomplish the remedy, although the contractor with the requisite equipment and experience may necessarily be from out-of-state. The implementation period is longer-term and has a higher potential for interference from inement or winter weather.

4.5.3 Cost

RACER costs modeled in a range of $442,000 direct cost to $570,000 as marked up sub-contracted costs to implement.

4.6 Alternative 5: No Action

The “no action” scenario is required by the EPA ABCA process. This alternative is to not address contaminants and trust that exposures are not realized from heavy metal contaminants to become available for human exposure.

4.6.1 Effectiveness

This alternative is deemed ineffective and unacceptable for continued Brownfield and community redevelopment. CCEF has stated that unaddressed residual contaminants, although not an imminent acute threat to health, are unacceptable to the community in constructing a greenway or bike path. It is unacceptable socially to the community because citizens, workers and construction workers could be unknowingly be placed at risk in the future in exposure to heavy metal contaminants. No-action provides neither remedy nor preventive value to site conditions or in support of improved public health.

4.6.2 Implementability

By its definition, taking no action precludes a discussion of implementation. The residual heavy metal contaminants would be left in the state in which they currently exist. The identified heavy metal contaminants would still pose a hazard to those using the area.

4.6.3 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 heavy metal contaminants. There would be no direct cleanup costs associated with this alterative. Direct costs associated with the No Action alternative and associated non-use of the buildings could consist of providing site security to prevent unrestricted community use.

5.0 RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup alternative is Alternative 3: 12-inch Excavation, Partial Asphalt Cover, Partial Seeding. This alternative would address exposure risks using a proven approach consistent with recognized industry standards. This option would remain comparably cost-competitive. It technically is readily implementable. Heavy metal removal in near-surface soils is definitive within the buffer zone and would address public exposures expressed as CCEF concerns. This alternative provides an added-value of using the 10-foot asphalt or concrete cover as a valuable community amenity for use as walking trail,

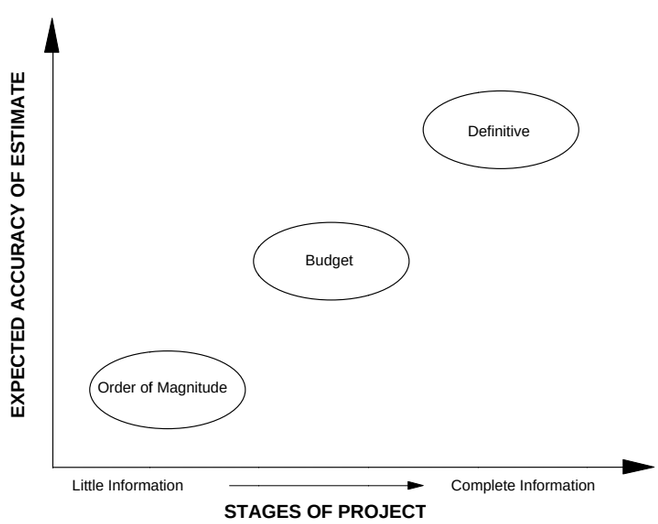
thereby promoting reclamation of Coffeyville urban greenspace and the healthy benefits the use of that area would entail.

6.0 METHODS OF ESTIMATING COST

The three types of cost estimating for remediation are order of magnitude estimate, budget estimate, and definitive estimate. The type of estimate developed generally depends on the amount of information available to the evaluator.

An order of magnitude estimate typically has the largest margin of error because it is performed in the initial stages of a project when relatively little information is known. Conversely, a definitive estimate typically has a smaller margin of error because it is performed at a later stage of a project when presumably most of the needed information is known. The following figure plots the three types of estimates against the expected accuracy of the estimate, based on the amount of information available.

For an order of magnitude estimate, historical costs for similar types of projects are often used to calculate a “ballpark” figure for the project. An order of magnitude estimate is completed at the initial stages of a cleanup, when minimal information is available. The cost of a project at this stage is frequently estimated by multiplying the number of “units” of a particular type of contamination (e.g., the number of cubic feet of contaminated sludge) by a pre-established cost for cleanup per unit (e.g., dollars per cubic foot) using a particular technology. USEPA guidance indicates an order of magnitude estimate might be expected to be between 70% and 150% of the future cost of remedy for the project. These ranges are not definitive and final costs can vary greatly depending on the complexity of project and regulatory requirements which may be required as the project moves forward during redevelopment. These types of estimates are used when considering the potential magnitude of restoration as it might relate to a potential project’s value or feasibility of acquisition.



Inset 1. Remedial Estimation for Draft ABCA

The budget estimate is prepared during the intermediate stages of the remedial design process. A higher level of accuracy is expected than that achieved with the order of magnitude estimate because more project-specific information is known. A budget estimate assesses the cost of each project component to compute an estimated total project cost. Several activities and cost items are grouped into a “system” that relates to the phase of cleanup. These systems are generally listed in the order in which they are employed in the cleanup. Budget estimates are sometimes referred to as assemblies or systems estimates. USEPA guidance indicates a budget estimate might be expected to be between 85% and 130% of the actual cost of the project. These ranges too are not definitive and final costs may vary significantly depending on the complexity of project and regulatory requirements which may be required as the project moves forward or land use changes during redevelopment. These types of estimates may be used to support requests for funding, preliminary budgeting, or planning as part of overall redevelopment.

A detailed cleanup plan design is required to produce a definitive estimate. This type of estimate is typically conducted once site characterization and/or a substantial portion of the remedial and redevelopment reconstruction design are completed. A definitive estimate is normally prepared by multiplying the quantity of each item needed by its unit price, and summing the line item totals. A competitive bid process is typically used to determine definitive estimates for reconstruction. Developing a definitive estimate is time consuming, but it is generally more accurate than other estimates because more is known about the site. Definitive estimates are sometimes referred to as unit price, quantity take-off, or bottom-up estimates. USEPA guidance indicates a definitive estimate might be expected to be between 95% and 115% of the actual cost of the project. Typically developed through engineering estimates from the remedial design plans and specifications, final costs may still vary.

The scope and budget strictures of the pre-grant Draft ABCA limit the remedial cost estimation effort. Regardless of format or level of detail, discussions of cost and remedy must be considered similar to order of magnitude cost estimates for making comparative evaluations, subject to changes required by regulatory agencies.

North

Scale: 1" = 150'

Legend

MH	Manhole
	Power Pole
LP	Light Pole
FP	Flag Pole
	Pole (Helper)
SGN	Traffic Sign
SIGN	Sign (Inform.)
	Misc. Object
	Large Tree
	Medium Tree
	Small Tree
	Bush/Shrub
	Building
	Railroad
	Water/Drainage
	Earth Berm
	Tree/Brush Line
	Fence
	Gravel Road
	Paved Road
	Depression
767.26	Spot Elevation
	City Limits
	Proposed Bike Trail Phase 1, 1,426 Lin. Feet

Coffeyville Engineering Department

	DESIGNED BY:	CHECKED BY:
	DRAWN BY:	APPROVED BY:
	SCALE: 1" = 150'	CONTRACT NO.
TITLE: Proposed Bike Trail Location Phase 1		DATE: 1/6/14
		REF #:
		SHEET #: 3 of 5

DWG. CODE: X:\ESCOTT\BIKE TRAIL\BIKE TRAIL 3-2012 B.DWG