

DECISION MEMORANDUM FOR ENVIRONMENTAL CLEANUP

United States Environmental Protection Agency
ECIA Brownfields Program BF-97764501
211 & 213 E Broadway St, Stanwood IA 52337

September 2022

PURPOSE

The Purpose of this Decision Memorandum is to document the proposed environmental cleanup at 211 & 213 E Broadway St, Stanwood as a requirement of the ECIA Brownfields Revolving Loan Fund. This Decision Memorandum is based on the approved RACM Demolition Cleanup Plan (RWP) and the Analysis of Brownfield Cleanup Alternatives (ABCA) and serves as notice to proceed with approved EPA Brownfields RLF funded activities.

General information about the Site's history and threats to human health and the environmental risk posed by existing contamination is included in this memorandum, but more detailed information is discussed in the Site RWP and the ABCA, which include a full description of the proposed environmental cleanup. The RWP and ABCA approved by ECIA were submitted for public comment starting March 16, 2022. Copies of the Site RWP and ABCA, as well as State Historic Preservation Office (SHPO) findings and response, were placed in the public repository located online at https://www.ecia.org/brownfields/brownfields_public_repositories/stanwood.php. Comments from the public meeting and that were received by mail prior to the meeting have been posted to the public repository. No comments regarding RWP, ABCA or SHPO were received after the public meeting.

Site Investigation activities that were conducted in March 2021 & July 2021 determined that regulated asbestos containing material was present in the structures located at 211 & 213 E Broadway St. Regulated ACM (RACM) must be removed before renovation or demolition activities will disturb the materials. Removal of RACM must be conducted by an Iowa-permitted asbestos abatement contractor. Additionally Site investigation conducted in December 2021 determined that soil contamination was present and provided limited delineation of soil contamination at the Site. The IA DNR reviewed the Phase I and II and deemed that the known concentrations of lead and arsenic at the property represent a low risk regarding potential adverse impact to the environment or public health. The IA DNR deferred the need for additional environmental assessment.

East Central Intergovernmental Association (ECIA) and the United States Environmental Protection Agency (US EPA) deemed the Site eligible for Brownfields RLF assistance. ECIA awarded city of Stanwood with a grant up to \$100,000 and a line of credit of up to \$50,000 with city match funds of 25% of eligible activity expenses. Site reuse is planned for commercial purposes.

The ECIA Brownfields RLF grant of \$100,000 and the line of credit of up to \$50,000 will be utilized for environmental remediation activities to complete a RACM demolition and properly remove any contaminated soil making the Site ready for reuse. All conditions related to US EPA Brownfields funding are in effect, including compliance with Davis-Bacon Act. Specific requirements of the Davis-Bacon Act may be made available. Additional information about other federal cross-cutting requirements can be found in the contract between the contractor and the city of Stanwood.

Regarding work on the Site under the contract, please note the following:

- Lansing Brothers Construction Co., Inc. is the designated Contractor and advises the city of Stanwood on technical matters related to the project. Contact information is Chad Lansing at 563.543.7360 or cmlansing1@gmail.com
- Any charges to any approved scope of work and and/or cleanup plan are to be pre-approved by the city and ECIA.

SITE SUMMARY

The Site is a brownfield as defined by the US EPA. The Site is located on approximately 0.12 acres situated on two parcels (Parcel #: 0460-02-24-308-008-0 & 0460-02-24-308-007-0). Exhibit 1 & 2 depicting the Site are included with this Decision Memorandum. The Site is located adjacent to the city building at 209 E Broadway St and north of the Union Pacific railroad tracks in the center of Stanwood. It appears that the Site was developed around 1900. By 1915 the property was used as a city hall/fire department and confectionary candy store. Then from 1936 to at least 2016 the Site was utilized for commercial purposes. From June 2016 to April 2020 the Site consisted of vacant space, an insurance office and apartments.

Under Iowa ch. 657(A), the city of Stanwood acquired the property in April 2020 due the deterioration of the structures. The exterior wall on the south side of the building located at 213 E Broadway had partially collapsed and both structures have significant water and structural damage. The city initially had plan to abate the asbestos and deconstruct the buildings to divert waste from the landfills.

Select Structural Engineering conducted a visual inspection of the Site on January 14, 2022 and deemed the structure unstable and unsafe for deconstruction workers. Given the building has been deemed unstable, asbestos abatement removal can't be completed on the structure without putting crews in danger. Therefore, based on the level of asbestos contamination found in the buildings the entire structures must be treated as a RACM demolition.

The city intends to cleanup the environmental contamination through RACM demolition which is the most appropriate technical approach to remediate asbestos to make the Site ready for future redevelopment. This selection is the most protective option for Site workers and future use of the Site.

The recommended remediation indicated in the ABCA was based on the proposed end use of expansion of city facilities or commercial use. The alternatives evaluated as part of the ABCA remain as listed below:

To address RACM at the Site:

- Alternative A: Pre-demolition RACM Removal
- Alternative B: RACM Disposal Post-Demolition (demolish in place)
- Alternative C: No action

To address lead in the soil:

- Alternative A: Excavation and Removal
- Alternative B: Environmental Covenant and Engineered Cap

- Alternative C: No Action

Alternative B for RACM and Alternative C for Lead were selected and will facilitate Site redevelopment. This Decision Memorandum serves as approval for the use of the ECIA Brownfields funding to implement cleanup as selected of the Site. As part of this cleanup air quality monitoring and testing will be conducted and a soil and groundwater management plan will be utilized by workers in regards to the soil. A remediation report will be submitted to the city upon completion of the remediation activities.

PROJECT SCHEDULE

The cleanup activity is to be funded in combination with city funds, IA DNR Brownfields grant funds, ECIA Brownfields grant and loan funds. The project is expected to be started in late September 2022. Implementation of remedial activities is anticipated to take two weeks.

ESTIMATED COST

The total estimated cost includes remediation activities and reporting totaling \$158,800.00

PUBLIC COMMENT:

This Decision Memorandum is to be placed in the project document repositories for public viewing. The ABCA and RWP have already been approved by the program, including the provision of appropriate public notice for comments that were to be submitted in writing to:

Stephanie VonBehren, City Clerk,
City of Stanwood
209 E Broadway St
Stanwood, IA 52337
Phone: 563-942-3340
Email: stanwood@netins.net

Submitted comments were to be evaluated by the city and addressed in the final RWP and ABCA. Comments at the public meeting and prior to the meeting were documented in the public repository. No comments were received from the public in regards to specifically the RWP and ABCA.

DECISION TO PROCEED

The city of Stanwood after consideration of all factors presented in this Decision Memorandum and relevant public comment per the 30-day public comment period, approves the contracted consultant to proceed with the federally funded eligible cleanup activities at the Site.

EXHIBIT 1 TOPOGRAPHIC SITE MAP – 211 & 213 E BROADWAY ST

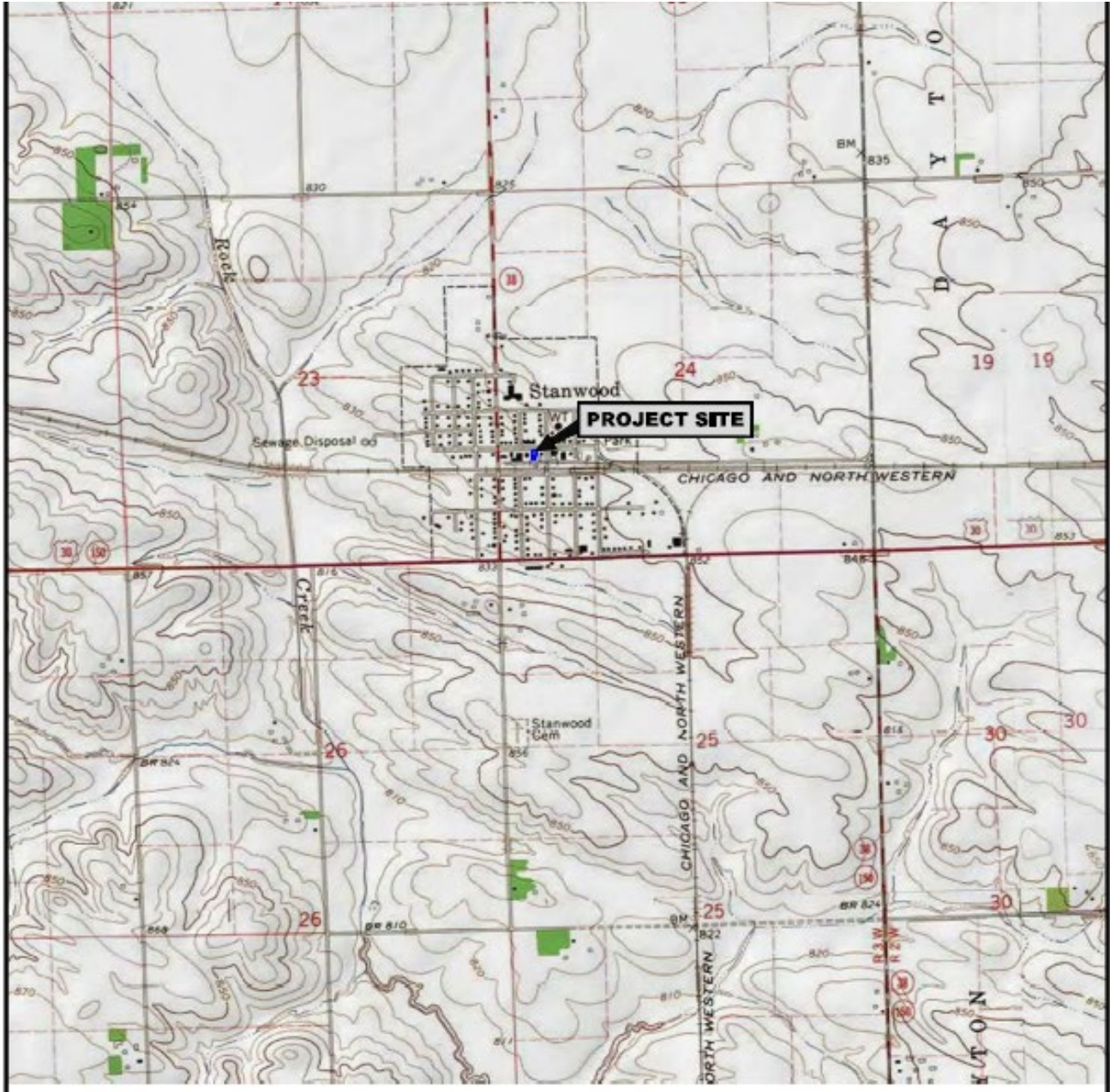


EXHIBIT 2 SITE BORING PLAN FOR PHASE II SAMPLING – 211 & 213 E BROADWAY ST

