



**City of Alexandria, Louisiana
FY24 Brownfields Cleanup Grant
Narrative Information Sheet**



1. Applicant Identification

City of Alexandria
625 Murray Street
Alexandria, LA 71301

2. Funding Requested

- a. Assessment Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$1,290,550

3. Location

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

4. Property Information

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

5. Contacts

a. Project Director

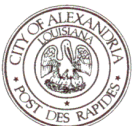
Shirley Branham, CBO, Assoc. AIA
Community Development Administrator
318-449-5070
Shirley.Branham@cityofalex.com
625 Murray Street, Suite 7
Alexandria, Louisiana 71301

b. Chief Executive/Highest Ranking Elected Official

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

6. Population

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



Jacques M. Roy,
Mayor

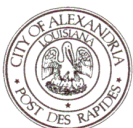


7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The proposed brownfield site(s) is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	NA
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	NA
The proposed site(s) is in a federally designated flood plain.	NA
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2-3, 8
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

8. Releasing Copies of Applications

Not Applicable.



Jacques M. Roy,
 Mayor



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL ASSESSMENT

October 23, 2023

Shirley Branham, CBO, Assoc. AIA
Community Development Administrator
City of Alexandria
625 Murray Street
Alexandria, LA 71301

RE: Louisiana Department of Environmental Quality acknowledgement of the City of Alexandria's FY24 Brownfield Cleanup Grant Application to the U.S. Environmental Protection Agency

Dear Ms. Branham:

Thank you for your efforts to enhance Louisiana's environment, economy, and quality of life by addressing environmental concerns at vacant and underutilized sites in your community through the Brownfields Program. The Louisiana Department of Environmental Quality (LDEQ) acknowledges the City of Alexandria's application for a Brownfield Cleanup Grant to address contamination at 210 Bolton Street site in Alexandria under the federal Small Business Liability Relief and Brownfields Revitalization Act and the Brownfields Utilization, Investment and Local Development Act.

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

Also, as indicated in the correspondence dated Oct. 23, 2023, your Environmental Professional (as defined in 40 CFR § 312.10) has certified that there sufficient level of site characterization from the environmental site assessment activities performed to date for the remediation work to begin on the 210 Bolton Street site in Alexandria, Louisiana.

Please contact me at (504) 736-7069 or Rebecca.Otte@LA.gov if you have any questions or need further assistance.

Sincerely,

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

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

cc: Imaging Operations – IAS AI 178641 & 1675



**City of Alexandria, Louisiana
FY24 Brownfields Cleanup Grant
Threshold Criteria**

Threshold Criteria

1. Applicant Eligibility

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

2. Previously Awarded Cleanup Grants

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

3. Expenditure of Existing Multipurpose Grant Funds

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

4. Site Ownership

The City of Alexandria is the current owner of the property, having acquired the property on November 2, 2023, through an Act of Donation.

5. Basic Site Information

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

6. Status and History of Contamination at the Site

- a) The site is contaminated with hazardous substances.
- b) The one-acre site at 210 Bolton Avenue hosted residential homes from 1914 through the 1950s when it was redeveloped as a dry cleaner that operated until approximately 2001. The facility was housed in a 12,350-square-foot building, with a 2,500-square-foot addition constructed some years later. Perchloroethene, also known as Perchlorethylene or "PERC," is the dry-cleaning solvent used at the Former Rush's Cleaners for roughly 50 years. The property has sat vacant since 2001 and the buildings are in a state of disrepair.
- c) The site has soil and groundwater impacts in the form of volatile organic compounds (VOCs) that are above the State of Louisiana's Risk Evaluation Corrective Action Program (RECAP) screening standards.
- d) The site shows evidence that historical releases from the dry-cleaning operations occurred, likely from leaking equipment and associated piping and improper storage and disposal, such as pouring spent solvents down drains, which commonly failed and released to the environment due to the nature of the chemicals. The overall vertical and lateral extents of contamination have been generally identified, with the VOC-impacted soils occurring primarily beneath the main building near where the equipment was formerly located and to the south and west of the building. The VOC-impacted groundwater occurs in the same general area.

7. Brownfields Site Definition

The City affirms that the site is:

- a) NOT a facility listed (or proposed for listing) on the National Priorities List (NPL);

- b) Not a facility subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c) Not a facility that is subject to the jurisdiction, custody, or control of the US government.

8. Environmental Assessment Required for Cleanup Grant Applications

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

- Phase I Environmental Site Assessment dated January 2011
- Phase I Environmental Site Assessment dated July 2022
- Phase I Environmental Site Assessment dated August 28, 2023
- Phase II Environmental Site Assessment dated September 2011
- Additional Phase II Environmental Site Assessment dated October 24, 2023

9. Site Characterization

- a. Not Applicable.
- b. The Former Rush’s Cleaners site at 210 Bolton Avenue is eligible to be enrolled in the state voluntary remediation program. A letter from the Louisiana Department of Environmental Quality is included in this application which:
 - i. Affirms that the site is eligible to be enrolled in the state voluntary remediation program.
 - ii. Confirms the site is NOT intended to be enrolled in the state voluntary remediation program, but rather, will proceed with the state’s equivalent oversight program, the *Risk Evaluation Corrective Action Program* (RECAP), designed specifically to regulate assessment and cleanup activities addressing risks to human health and the environment posed by the release of chemical constituents to the environment.
 - iii. Indicates that there is sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to being on the site.
- c. Not Applicable.

10. Enforcement or Other Actions

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

11. Sites Requiring a Property-Specific Determination

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

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes

Not Applicable.

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

Not Applicable.

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

Not Applicable.

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

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

Not Applicable.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition

- (i) The City acquired the property by an Act of Donation from a private owner.
- (ii) The City acquired the property on November 2, 2023.
- (iii) The City is the sole owner of the property and has fee simple title.
- (iv) The City accepted the property from the previous owner: Dien Tran.
- (v) The City does not have familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators of the site.

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

- (i) All site assessments were performed for the City of Alexandria, Louisiana, through either Brownfield Assessment Grants or paid through general funds:
 - Phase I Environmental Site Assessment dated January 2011
 - Phase I Environmental Site Assessment dated July 20, 2022
 - Phase I Environmental Site Assessment dated August 28, 2023
 - Phase II Environmental Site Assessment dated September 2011
 - Additional Phase II Environmental Site Assessment dated October 24, 2023
- (ii) Terracon Consultants performed the Phase I Environmental Site Assessments completed in July 2022 and August 2023 prior to property acquisition. The assessments were performed under the direction of Environmental Professional, Rachel Keane, who exceeds the qualifications of an Environmental Professional, as defined in Section 312.10 of 40 CFR. Both reports were completed as part of the City of Alexandria's Community-wide Assessment Grant funding.
- (iii) Not Applicable.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal: All disposal of hazardous substances at the site occurred before the City acquired the property. The City

has not caused or contributed to the release of any hazardous substances on the property. The City has not, at any time, arranged for the disposal of hazardous substances at the property or transported hazardous substances to the property.

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

(e) Continuing Obligations:

(i) There are no known continuing releases at this time. Based on the planned cleanup and reuse of the site and State of Louisiana RECAP Program requirements, any residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions as will be defined in the No Further Action Finding Letter issued by the LDEQ, thus fulfilling the City's continuing obligations in regard to current releases of known hazardous substances found at the site.

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

(iii) The City has exercised appropriate care with hazardous substances found at the site by taking reasonable steps including ensuring no soil or groundwater disturbance activities have or will occur, inspecting the site to ensure no asbestos or lead exposures exist, and verifying no hazardous chemicals are stored at the site. These measures were done to prevent or limit exposure to any previously released hazardous substance. The planned cleanup activities will further prevent and limit exposure to previously released hazardous substance. The City intends to use Cleanup Grant funds to treat and/or remove impacted soils and treat impacted groundwater, effectively limiting exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical state program requirements, any residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions as will be defined in the No Further Action Finding Letter issued by the LDEQ, thus fulfilling the City's continuing obligations in regard to preventing and limiting exposure to past releases of known hazardous substances found at the site.

The City confirms its commitment to:

- (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;
- (ii) assist and cooperate with those performing the cleanup and provide access to the property;

- (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) provide all legally required notices.

13. Cleanup Authority and Oversight Structure

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

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

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

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

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

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

b. Community Notification Ad

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

c. Public Meeting

A presentation was made during a regularly scheduled public council meeting on November 8, 2023, at 6:00 p.m. The City documented participant attendance at the meeting. Comments were received until November 9, 2023.

d. Submission of Community Notification Documents

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

- a copy of the draft ABCA;
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at **14 days** before the application was submitted to the EPA;
- the comments received – NONE RECEIVED;
- response to those public comments – NONE REQUIRED;
- meeting notes from the public meeting; and
- meeting sign-in sheets/participant list.

15. Contractors and Named Subrecipients

Not Applicable.



**City of Alexandria, Louisiana
FY24 Brownfields Cleanup Grant
Threshold Criteria
Draft ABCA**

Analysis of Brownfield Cleanup Alternatives

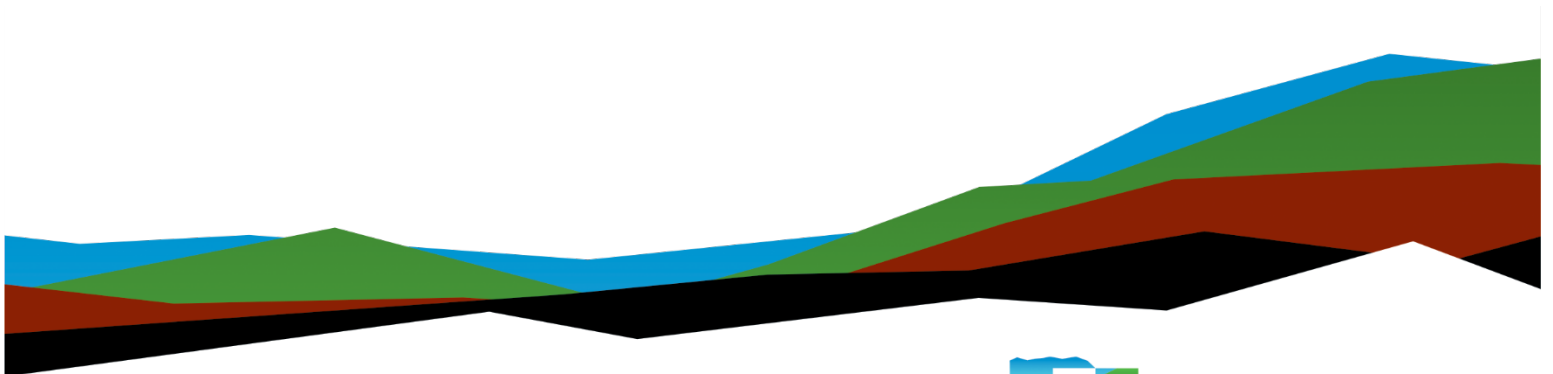
Former Rush's Cleaners Site
210 Bolton Avenue
Alexandria, Rapides Parish, Louisiana
ACRES Property ID 124282

Prepared for:

City of Alexandria

Prepared By:

Terracon Consultants



Nationwide
Terracon.com

- Facilities
- Environmental
- Geotechnical
- Materials

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1.0 INTRODUCTION AND BACKGROUND

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

The EPA Brownfield Cleanup Grant application must include, as an attachment, an ABCA which briefly summarizes information about the Site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup.

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

1.1 Background

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

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

The Site shows evidence that historical releases from the drycleaning operations occurred, likely from leaking equipment and associated piping and improper storage and disposal, such as pouring spent solvents down drains, which commonly failed and released to the

environment due to the nature of the chemicals. The overall vertical and lateral extents of contamination have been generally identified, with the VOC-impacted soils and groundwater occurring primarily beneath the main building near where the equipment was formerly located and to the south and west of the building.

1.2 Site Assessment Findings

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

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

As part of the 2011 investigation and to assist in future site planning decisions, soil and groundwater constituents of concern (COC) that exceeded RECAP SS were further evaluated under LDEQ's RECAP Management Option-1, to develop site-specific risk-based standards for both the site and surrounding parcels. As the proposed redevelopment plans consisted of a bus terminal, an industrial exposure scenario was applied to the site. Additionally, as

proposed redevelopment plans included the construction of a new building, the soil protective of enclosed structures (Soiles) and groundwater protective of enclosed structures (GWes) were also evaluated. Management Option-1 Limiting RECAP Standards (LRS) were developed in accordance with RECAP Appendix H. The MO-1 Evaluation identified concentrations of COC in soil above the Soiles and concentrations of COC in groundwater above the GWes. Concentrations of COC were below the MO-1 LRS developed for surface soil, subsurface soil and groundwater.

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

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

2.0 PROJECT GOALS AND RE-USE PLAN

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

rerouting of existing transit routes, and provides opportunities for first-mile/last-mile connections via pedestrian and bicycle routes or car-sharing programs. Overall, the City believes this redevelopment will serve as a catalyst for revitalization of the disadvantaged community.

3.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

3.1 Cleanup Responsibility

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

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

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

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

3.2 Cleanup Standards

LDEQ RECAP uses risk evaluation to: (1) determine if corrective action is necessary for the protection of human health and the environment, and (2) identify constituent levels in impacted media that do not pose unacceptable risks to human health or the environment, i.e., RECAP Standards. RECAP consists of a tiered framework composed of a Screening

Analysis of Brownfield Cleanup Alternatives

Former Rush's Cleaners

210 Bolton Avenue ■ Alexandria, Louisiana



Option and three Management Options. This tiered approach allows site evaluation and corrective action efforts to be tailored to site conditions and risks. As the Management Option level increases, the approach becomes more site-specific and, hence, the level of effort required to meet the objectives of the Option increases. Although the level of effort required for each Option varies, each Option achieves a common goal: protection of human health and the environment.

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

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

PCE= Tetrachloroethene, TCE = Trichloroethene, VC = Vinyl Chloride, DCE = cis-1,2 Dichloroethylene, ppm = parts per million

NA = Not Applicable, per RECAP enclosed space standards are not applicable to subsurface soils

3.3 Laws and Regulations Applicable to the Cleanup

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

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

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §§ 9601, et. seq.

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

4.0 EVALUATION OF CLEANUP ALTERNATIVES

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

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

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inhalation of volatile emissions in soil and groundwater to an enclosed structure pathway. Volatile COC were detected in soil and groundwater above the enclosed space standards for soil and groundwater.

Under RECAP, typically, contaminated surface soils can be remediated by removing and properly disposing of surface soils. As the redevelopment plans include the construction of an enclosed structure there is potential for human exposure of inhalation of volatile emissions from soil and groundwater. One option would be to remove surface soils exceeding the industrial and enclosed space Limiting RECAP Standards with chemical oxidation treatment for groundwater. A second option would be to remove surface soils exceeding the industrial limiting RECAP standards with chemical oxidation treatment for groundwater, and installation of a vapor mitigation system if an enclosed structure is to be constructed on the impacted area. A third option would be to remove surface soils exceeding the industrial and enclosed space Limiting RECAP Standards with dewatering activities to remove impacted groundwater and dispose off-site. Under all three options, as industrial use exposure is applied to the site, a conveyance notice would have to be filed indicating that the site was evaluated under industrial use and if the site use is to change to non-industrial, further evaluation and or remediation would be required by LDEQ.

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

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

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:

Table 1: Summary of Cleanup Alternatives

Cleanup Alternative	Description
A	Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) Exceeding Industrial and Enclosed Space RECAP Standards with chemical oxidation for Groundwater.
B	Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) Exceeding Industrial RECAP Standards, Chemical oxidation for Groundwater, and Use Restrictions Regarding Structures over the Impacted Area.
C	Excavation and Off-Site Disposal of Impacted Surface Soils (0-15) Exceeding Industrial and Enclosed Space RECAP Standards with Dewatering Activities to Remove Impacted Groundwater for Off-Site Disposal.
D	No Action

4.1 Cleanup Alternative A: Excavation and Off-Site Disposal of Impacted Surface Soils Exceeding Industrial and Enclosed Space Standards with Chemical Oxidation for Groundwater

Alternative A includes excavation and removal of impacted surface soils (0-15 feet) exceeding enclosed space Limiting standards as well as surface soils exceeding industrial limiting standards. Soil confirmation samples will be collected from the sidewalls and bottom of the excavation area to ensure impacted surface soils have been removed. As groundwater is typically encountered at depths of 5 to 9 feet bgs, groundwater will be encountered during excavations. Accumulated groundwater will be treated directly in the open excavation via chemical oxidation. The open excavation will then be backed filled with imported fill. Permanent monitoring wells will be installed to monitor groundwater at the site on a quarterly basis for a minimum of two years. Prior to the Site remediation activities, a remediation plan would be developed and approved by the LDEQ. As the limiting standards are based on an industrial/commercial exposure, a conveyance notice will be filed to limit site use to commercial/industrial use.

4.1.1 Effectiveness – Including Climate Change Considerations

The impacted soils are permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. Furthermore, risk of inhalation of volatile emissions is removed. Maintenance of a remediation system will not be required. With removal and off-site disposal of contaminants, the approach requires no special post-remedy institutional control for the property. However, if Site uses were to change from industrial/commercial to non-industrial/residential, the site would have to re-evaluated and further corrective action may be warranted.

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

which could impact excavation activities (stormwater contact with contaminated soils). Removal of impacted soils and treating groundwater reduces the potential for environmental contamination.

4.1.2 Implementability

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

4.1.3 Cost

Based upon Terracon's experience with similar projects and quotes from chemical suppliers and remediation contractors, the estimated cost for excavation and off-site disposal of contaminated soil, confirmation sampling, chemical oxidation, permanent well installation and groundwater monitoring, development of a remediation plan and required reporting, and professional environmental consulting services is approximately \$1,238,300.

4.2 Cleanup Alternative B: Excavation and Off-site Disposal of Impacted Surface Soils Exceeding Industrial Limiting Standards with Chemical Oxidation for Groundwater and Use Restrictions of Enclosed Structures over Impacted Areas

Alternative B includes excavation and removal of impacted surface soils (0-15 feet) exceeding Industrial Limiting RECAP standards. Soil confirmation samples will be collected from the sidewalls and bottom of the excavation area to ensure impacted surface soils have been removed. As groundwater is typically encountered at depths of 5 to 9 feet bgs, groundwater will be encountered during excavations. Accumulated groundwater will be treated directly in the open excavation via chemical oxidation. The open excavation will then be backed filled with imported fill. Permanent monitoring wells will be installed to monitor groundwater at the site on a quarterly basis for a minimum of two years. Prior to the Site remediation activities, a remediation plan would be developed and approved by the LDEQ. In addition to limiting site use to industrial use, additional site use restrictions will include restriction of enclosed structures on the impacted areas unless a vapor mitigation system is installed.

4.2.1 Effectiveness – Including Climate Change Considerations

The impacted soils are permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. However, as the limiting standards are based on industrial/commercial use, if

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Site uses were to change from industrial/commercial to non-industrial/residential, the site would have to re-evaluated and further corrective action may be warranted.

Site use restrictions such as restricting enclosed structures, unless a vapor mitigation system is installed, on the impacted area will eliminate the inhalation of volatile emissions from soil and groundwater pathway. A vapor mitigation system may be installed to eliminate the inhalation of volatile emissions from soil and groundwater pathway as well as further site use restrictions. Installation of a vapor mitigation system may require maintenance.

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

4.2.2 Implementability

This alternative is readily implementable. It is a mature remedy common in the remediation industry. The approach requires construction equipment readily available in the local construction and engineering markets. The materials for backfill and cover are readily available in the local area. A labor force readily exists in the area to accomplish the remedy. The implementation period is longer term. Excavation activities can be completed in 1 to 3 months, following approval of a remediation plan. A vapor mitigation system cannot be installed until construction of an enclosed structure.

4.2.3 Cost

Based upon Terracon's experience with similar projects and quotes from chemical suppliers and remediation contractors, the estimated cost for excavation and off-site disposal of contaminated soil, confirmation sampling, chemical oxidation, permanent well installation and groundwater monitoring, development of a remediation plan and required reporting, and professional environmental consulting services is approximately \$1,181,040.

Costs associated with designing a vapor mitigation system are included, however costs associated with implementing the vapor mitigations system are not.

4.3 Cleanup Alternative C: Excavation and Off-Site Disposal of Impacted Surface Soils Exceeding Industrial and Enclosed Space Limiting Standards with Dewatering Activities

Alternative C includes excavation and removal of impacted surface soils (0-15 feet) exceeding all Limiting RECAP standards. Soil confirmation samples will be collected from the sidewalls and bottom of the excavation area to ensure impacted surface soils have been removed. As groundwater is typically encountered at depths of 5 to 9 feet bgs, groundwater

will be encountered during excavations. To ensure the accumulated groundwater can be disposed of as non-hazardous waste, accumulated groundwater will be treated directly in the open excavation. The open excavation will then be dewatered for off-site disposal of impacted water. Upon completion of dewatering activities, the excavation will then be backed filled with imported fill. Permanent monitoring wells will be installed to monitor groundwater on a quarterly basis for two years. Prior to the Site remediation activities, a remediation plan would be developed and approved by the LDEQ.

4.3.1 Effectiveness – Including Climate Change Considerations

The impacted soils and groundwater are permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. Furthermore, risk of inhalation of volatile emissions is removed. Maintenance of a remediation system will not be required. With removal and off-site disposal of contaminants, the approach requires no special post-remedy institutional control for the property. However, if Site uses were to change from industrial/commercial to non-industrial/residential, the site would have to re-evaluated and further corrective action may be warranted.

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

4.3.2 Implementability

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

4.3.3 Cost

Based upon Terracon's experience with similar projects and quotes from chemical suppliers and remediation contractors, the estimated cost for excavation and off-site disposal of contaminated soil, confirmation sampling, chemical oxidation, dewatering and off-site disposal of groundwater, groundwater monitoring and reporting, development of a remediation plan and required reporting, and professional environmental consulting services is approximately \$1,790,540.

4.4 Cleanup Alternative D: No Action

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

4.4.1 Effectiveness

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

4.4.2 Implementability

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

4.4.3 Cost

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

4.5 Cost Comparison Alternatives

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

Table 2: Summary Comparison of Alternative

Alternative	Effectiveness	Implementability	Estimated Cost
A – Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding Enclosed Space Standards with Chemical Oxidation for Groundwater	<p>This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk.</p> <p>Will eliminate the inhalation of volatile emissions from soil and groundwater to an enclosed structure pathway.</p>	<p>This alternative is technically achievable and common in the remediation industry. Resources to implement this alternative are readily available. Time to implement is relatively short (on the order of 1-3 months).</p>	\$1,238,300

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Alternative	Effectiveness	Implementability	Estimated Cost
B – Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding Industrial Limiting RECAP Standards with Chemical Oxidation for Groundwater and Use Restrictions of Enclosed Structures Over Impacted Areas	<p>This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk.</p> <p>The inhalation of volatile emissions in soil and groundwater to an enclosed structure pathway is eliminated with either site use restrictions or installation of a vapor mitigation system.</p>	<p>This alternative is technically achievable and common in the remediation industry. Resources to implement this alternative are readily available and time to implement excavation activities is relatively short (on the order of 1-3 months). A vapor mitigation system cannot be designed until site plans are final and cannot be installed until construction commences.</p>	\$1,181,040
C – Excavation and Off-Site Disposal of Impacted Surface Soils (0-15 feet) exceeding all Limiting RECAP Standards with Dewatering and Off-site Disposal of Impacted Groundwater	<p>This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk.</p> <p>Will eliminate the inhalation of volatile emissions from soil and groundwater to an enclosed structure pathway.</p>	<p>This alternative is technically achievable and common in the remediation industry. Resources to implement this alternative are readily available and time to implement is relatively short (on the order of 1-3 months).</p>	1,790,540
D – No Action	Does not address risks	No applicable	Negligible direct cost

5.0 RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup approach is Alternative A: Excavation and Off-site Disposal of Impacted Surface Soils Exceeding Enclosed Space Limiting Standards with Chemical Oxidation for Groundwater. This alternative would address vapor inhalation exposure risks using a proven approach consistent with recognized industry standards while at the same time easily garnering LDEQ approval. This option would remain comparably cost-effective under most remediation scenarios and Site conditions. Limitations to future land use will remain, however, industrial use is consistent with the proposed Site Use. This alternative addresses liabilities, potential contaminant sources or potential limitations to future land use and brownfields redevelopment potential consistent with the City of Alexandria's goals and re-use planning.



**City of Alexandria, Louisiana
FY24 Brownfields Cleanup Grant
Threshold Criteria
Community Notification Documents**

Target Neighborhood Public Hearing for Comment - Sign In Sheet

Print Name	Address	Contact Phone Numbers	Target Neighborhood Area
Shelly Gotreaux	COA	449-5075	
Terry Brightwell	COA	449-5073	
Candice Saucier	COA	449-5076	
Barbara Williams	1398 Park Ave	487-1146	
Jackie Allen	3004 3rd St	318-769-8385	
McCall	351 AVOYU	31828-0818	D
T.L. Norman	808 Bennett	443-9536	D
Patricia Redman	COA	449-5072	
Vivian Fulton	2316 Nynson St Alex	442-7884	A/B
Frank Freed	2132 Levin St.	4184145	
Winnie G. Marshak	825-15 th St. Alex WA 7301	475-0120	C
Nick Mybrey	COA	318-304-1776	
Keith Gremillion	COA	318-359-3494	
Chad Reed	COA	318449-5011	
Naomi Hills	COA	449-5074	
Shirley Branham	COA	449-5070	
Mercelle James	327 13 th St	730-6123	



**City of Alexandria, Louisiana
FY24 Brownfields Cleanup Grant
Narrative**

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

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

With the success of the **community-driven 2021 Brownfields Revitalization Master (BFRM) Plan**, created during the FY20 Assessment Grant project, the **residents** identified three additional census tracts to focus the City’s brownfield efforts. The **geographic boundary** for this application is the city limits, with a focus on a **target area including Census Tract (CT) 22079013900: Original Town and CTs 22079012000, 22079012100, and 22079012200: BLA District (all Justice 40 Disadvantaged Census Tracts)**. The BLA District includes the brownfield areas identified through the community-led **BFRM Plan** for Bolton Avenue, Lee Street, and Arial Drive. The target area is home to a large minority sensitive population (71% Black) who are living with economic and **environmental justice difficulties** such as high unemployment (15%), high poverty (34%), blighted and distressed neighborhoods, and high percent (26%) of the **households without a vehicle**.¹ The City is working to transform the target area into a vibrant, walkable, transit-oriented community by promoting public and private investments that capitalize on existing plans to connect the underserved residents to employment, housing, and recreation. This grant will allow the **Former Rush’s Cleaners** site, located along the City’s existing pedestrian trail system, to be transformed into a centrally located **Bolton Ave Mobility Hub**, which follows the redevelopment concepts from the 2021 BFRM Plan. The Alexandria Transit (ATRANS) station has been located downtown since its inception, and with the majority of the disadvantaged community living in areas farther away from downtown, the need for the ATRANS station to be relocated to the target area is more pressing than ever.

ii. Description of the Proposed Brownfield Site(s): The cleanup site for this application is the **Former Rush’s Cleaners** (1.0 acre) at 210 Bolton Avenue. The property hosted residential homes from 1914 through the 1950s when it was redeveloped as a dry cleaner that used perchloroethene solvents and operated until approximately 2001. The facility was housed in a 12,350-square-foot building with a 2,500-square-foot addition constructed some years later. The property has sat vacant since 2001, and the buildings are in a state of blight and dilapidation. A wide variety of schools, churches, parks, and gathering centers are within a mile of the site. The Former Rush’s Cleaners was assessed multiple times over the past 10–12 years, including 3 Phase I Environmental Site Assessments (ESA) and 3 Phase II ESAs. The assessments confirmed that asbestos was not

¹ US Census – 2017–2021 American Community Survey

present in the structures; however, very high concentrations of dry-cleaning chemicals including tetrachloroethene, trichloroethene, and vinyl chloride were confirmed to be present in the groundwater and in soils up to 32 feet in depth.

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

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

By relocating ATRANS station to the Former Rush’s Cleaners site and transforming it into the Bolton Ave Mobility Hub, the transit hub will become centrally located within the City, will not require rerouting of existing transit routes, and will provide opportunities for first-mile/last-mile connections via pedestrian and bicycle routes or car-sharing programs. Additionally, the new hub is within a five-minute bicycle ride to the City’s existing trail system that leads to the downtown, park amenities, healthcare, additional residential neighborhoods, and other brownfields sites being assessed and planned for redevelopment. The Bolton Ave Mobility Hub is **located where 26% of households have no access to a vehicle.**² The relocation of the ATRANS station will also provide the City with a unique opportunity to develop the historic structure as an iconic downtown feature along the Red River. The master plan for the Bolton Ave Mobility Hub includes an extension of Madison Street from Bolton Avenue that will provide uninterrupted vehicular and pedestrian access into the site and economic vitality to the existing brownfield sites that could be remediated and redeveloped. Additional mobility hub improvements include bicycle share, electric vehicle charging stations, and a ride-share hub. This redevelopment will serve as a critical link to connect the disadvantaged community to new opportunities and bring underused properties back into productive use, thereby increasing property values and tax revenues while creating expanded mobility throughout the target area and beyond.

ii. Outcomes and Benefits of Reuse Strategy: The redevelopment of this site is a vital component of the overall approach for revitalizing the target area. Repurposing the site as the Bolton Ave Mobility Hub will catalyze redevelopment along the evolving Bolton Avenue corridor and overall Original Town and BLA District. As part of the planned redevelopment, the City has already acquired the vacant, blighted properties adjoining the Former Rush’s Cleaners site, one of which is also a brownfield due to historic use. These properties, along with the site proposed for cleanup in this application, will provide the necessary footprint to allow for smooth uninterrupted vehicle

² US Census 2017–2021 American Community Survey

and pedestrian access into the site while also allowing space for **Climate Adaptation and Resilience** elements such as the bicycle share, electric vehicle charging stations, ride share hub, and space for safe, easy access to the City's existing trail system connecting the hub to all census tracts in the target area (noneconomic benefit). The City will encourage this site and other target-area redevelopment spurred by this site's new use to use **energy efficient sources and renewable energy, such as solar**, as part of their redevelopment strategy. The City will also explore opportunity to convert its existing bus fleet to cleaner energy such as natural gas or electric motors.

This redevelopment will lead to increased employment opportunities at community-serving establishments for approximately 50 people (economic benefit), due to the adjacent, partially vacant and underused commercial shopping center area being revitalized by the construction of the Bolton Ave Mobility Hub. Property values in the area will increase (economic benefit) with improved walkability and access to existing trail system connecting major portions of the City. In turn, these types of outcomes will create a heightened sense of community and reduce crime rates, spurring further development of the trail system and leading to additional health benefits associated with more active lifestyles (non-economic benefit). Businesses will thrive in the area and people will be drawn to this active, walkable community and thus draw a greater tax base to the City (economic benefit).

c. Strategy for Leveraging Resources i. Resources Needed for Site Characterization: As part of previous site investigations under a prior Brownfields Assessment Grant and City General Funds, the overall extent and degree of contamination was sufficiently characterized to develop a draft Analysis for Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach, from which a Remedial Action Plan (RAP) will be formulated. At this time, the City does not anticipate needing more funding for further characterization of the site and is ready to proceed to cleanup.

ii. Resources Needed for Site Remediation: EPA Grant funding requested in this application will be sufficient to complete the remediation of the Former Rush's Cleaners Site. The City will spearhead the cleanup process and hire an environmental contractor to manage and implement remediation efforts. The cost of the cleanup required is **\$1,290,550** and does not fit into the City's limited available funding for site redevelopment. The partnership with the EPA will fulfill the City's goal of remediation and allow it to move on to the reuse phase of development.

iii. Resources Needed for Site Reuse: The Former Rush's Cleaners site, in its state of dilapidation, is a hazard to the community and has already been slated for demolition using general funds that will be allocated in January 2024 now that the City has obtained ownership of the property. Following cleanup of the site, funds are needed to create the mobility hub. As reuse of the existing structures is not possible, new construction will be needed, and the City estimates construction costs at approximately \$6 million. The City will be applying for federal and state transportation grants and possible HUD CDBG entitlement grants to fund the site redevelopment. The site is also located in the BLA District, where the City is authorized to collect tax increment for the period 2012–2037. If utilized, the City will reinvest BLA District tax increment back into the area to encourage economic growth, support local businesses, and remove barriers to redeveloping environmentally contaminated properties. The City will work with the Central Louisiana Chamber of Commerce to ensure the **Opportunity Zone** and its tax incentives are being marketed to interested developers and investors to further redevelopment. The City also pursued and was awarded a second **EPA Brownfield Assessment Grant** to continue assessment activities in the target area, and LDEQ Brownfield Assessment funding for unique assessment needs.

iv. Use of Existing Infrastructure: The City intends to use existing target-area infrastructure as stated in its redevelopment plans. Should existing infrastructure improvement needs arise, the City

will look to state and federal funding sources to supplement the current budget allocation for repair, maintenance, and new installation of infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding: Encumbered by the current limits of its timber and agricultural economy in a global world, Alexandria is actively seeking stability, prospects, and a pathway toward growth. With only limited funding available as a result of its reduced tax base, the City's progress is slow. The City is further burdened by the substantially growing need to remove severely blighted and dilapidated structures that represent a hazard to the community. The Original Town & BLA District target area is home to a community in need of revitalization. **The population of those residing in the target area is 9,647.³ Residents suffer from low income as shown by the target area's average per capita income of \$22,749 and median household income of \$30,435,** which are significantly less than the national averages (\$37,368/\$69,021).³ The percentage of all people **below the poverty level in the target area is 34%, nearly four times the national average (9%).³** To make matters worse, the target area has a much higher unemployment rate (15%) compared to national rates (5.5%).³ As evidenced by these statistics, residents have been suffering from blight and a lack of industry for years. Currently, City funds are primarily used for basic services such as police, fire, and sanitation, with any target-area projects funded through several available bond options and grant awards. The City needs financial assistance to assess and cleanup the target-area brownfields. Without the funding, sites such as this, would sit vacant and dilapidated with no hope of renewal. With the **low-income population** and a high unemployment rate, raising taxes to fund additional projects is impossible, but the assistance of an EPA Brownfields Cleanup Grant will benefit the sensitive populations by enabling redevelopment of the site, which in turn will spur additional much-needed revitalization in the area.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: Within the target area the **sensitive population includes minorities and those living in poverty.** The target area has a high percentage of Black minorities (71%), nearly **six times higher** than the national average (13%).³ Other sensitive populations include **all people living below the poverty level (34%) and those under the age of 18 living below the poverty level (47%),** significantly higher than national averages (13%, 17%).⁴

The redevelopment of the Former Rush's Cleaners will address **welfare issues** plaguing the city such as crime and a lack of transportation. Within the target area **26% of households do not have access to a vehicle** (US 8%), making walkability and increased transportation options an extremely important part of residents' daily lives.⁴ Exacerbating this issue is the target area being located in a **USDA Food Desert.** As part of the 2021 **BFRM Plan**, the City has an existing trail system that connects the downtown to the Red River, Bayou Rapides, park amenities, healthcare, residential neighborhoods, and potential brownfield sites. The redevelopment at the Former Rush's Cleaners Site into the Bolton Ave Mobility Hub will allow for the four miles of existing pathways to connect to the majority of the target area. The Hub redevelopment is within a five-minute bicycle ride along this greenway to downtown and the Red River, allowing residents to pursue additional job options throughout the city. **Crime reduction is greatly needed within the target area.** The City's violent crime rate at 18.8/1,000 residents is nearly triple the state's at 6.8/1,000 residents.⁵ The redevelopment of the **Former Rush's Cleaners** site into the **Bolton Ave Mobility Hub** will

³ US Census: 2017–2021 American Community Survey

⁴ EJ Screen Report

⁵ Neighborhood Scout – Crime Data Alexandria, LA

not only address mobility issues, access to fresh foods and jobs, but also decrease crime with safer transportation and removal of blight.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Sensitive populations are the most at risk when it comes to disease and health conditions that can arise from brownfield sites. Lead paint and asbestos exposure typically associated with aging structures pose increased risks to sensitive populations, especially for the target area's Black and children-living-in-poverty residents. The Environmental Justice (EJ) Screen Report shows the target area ranks in the **92nd percentile in the state for lead paint indicator**. Lead exposure can result in severe health and developmental consequences in **infants and children**, and asbestos exposure can result in many forms of **cancer** and breathing problems such as **asthma**. Relocating the City's transit hub to the target area is expected to be the revitalization spark for removal of these hazards in this neighborhood.

The EJ Screen Report shows the target area is in the **70th percentile for respiratory hazard** in the US and **81st percentile for traffic proximity** in the state, which compounds the health issues (cancer & asthma) associated with the priority brownfield sites and their potential contaminants. The Climate and Economic Justice Screening Tool (CEJST) shows the **weighted percent of people told they have asthma is in the 91st percentile in the target area**. Within Rapides Parish, **cancer** is the second leading cause of death (**target-area cancer data is not available**). The Parish rate (171.6) is much higher compared to the US rate (155.6), with lung cancer causing the most deaths at 49 per 100K (US 39 per 100K).⁶ In addition, the Parish percent of **low-weight births** is 11%, higher than the national average (8%).⁶ This is troubling considering the contaminants at the Former Rush's Cleaners are VOCs such as tetrachloroethene, trichloroethene, and benzene, all of which can **cause several different forms of cancer and health problems**. By performing this cleanup and removing these contaminants, residents will be safe from dangerous contaminants in their drinking water, soil, and air in their own community.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The derelict properties throughout the target area, such as the Former Rush's Cleaners, generate a ripple effect of negative consequences, including **decreased taxable revenue, decreased property values, and reduced ability to market properties for redevelopment**. They also exacerbate EJ issues such as **low income, high unemployment, substandard housing, lack of transportation options, and distressed neighborhoods** that affect the underserved residents of the target area. The EPA EJ Screen Report shows the target area in the 79th percentile in the nation for people of color, 86th percentile for low income, and 90th for unemployment. **All four of the census tracts** included in the target area are **fully disadvantaged Justice40 tracts** with a combined total of 16 categories listed.⁷

Due to the negative environmental consequences caused by the plethora of abandoned and blighted properties in the target area, the sensitive populations have not experienced the same economic growth and vitality as the rest of the City. This is evident by the target area's extremely low median household (\$30,435) income and the high unemployment rate (15%) and high poverty rates (34%).⁸ As the years have gone by, the negative environmental consequences scared away potential investors, causing the blighted, dilapidated and vacant buildings to sit idle. The negative environmental consequences and threats will be reduced and, in some cases, reversed upon the identification, assessment, and remediation made possible by the EPA Brownfield Grant Program removing the contaminants and bringing new life and business opportunities to the area. The

⁶ 2019 Community Health Needs Assessment: <https://rapidesregional.com/util/pdf/2019/2019-Community-Health-Needs-Assessment-Report-a.pdf>

⁷ CEJST

⁸ US Census: 2017–2021 American Community Survey

proposed reuse of Former Rush’s Cleaners as a mobility hub directly **addresses the EJ issue of lack of transportation options**, which is crucial to the Biden Administration’s Justice40 Initiative. Addressing these EJ issues will set the stage for redevelopment, enabling new businesses to occupy revamped commercial spaces in a neighborhood with an improved standard of living. The proposed remediation and reuse of the site, as well as the vision for revitalization in the target area, will improve the health and well-being of the sensitive populations and remedy many of the environmental and socioeconomic justice issues affecting this underserved community.

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

The mobility hub will transform the target area by addressing the issue of being located within a **food desert**, while also giving residents better mobility to address issues of **low income** and **crime**. Redevelopment of the Former Rush’s Cleaners site will spur private investment dollars in the surrounding area for needed food-related businesses, medical clinics, and amenities in the heart of the community. **The site and adjoining parcels of land needed to create the Bolton Ave Mobility Hub have been vacant and dilapidated for decades, and no existing residents or businesses will be displaced by the redevelopment.** As the area begins to revitalize as a result of the transportation hub development, the City will employ redevelopment strategies designed to mitigate and minimize any potential displacement.

b. Community Engagement i. Project Involvement & ii. Project Roles: The following project partners will assist in the EPA Brownfield Cleanup project through the process of cleanup of the Former Rush’s Cleaners and transformation into the Bolton Ave Mobility Hub.

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
Central Louisiana Homeless Coalition	Kitty Winn (318) 443-0500 x 100	501(c)(3) responsible for management, transitional housing, and support services for the homeless; will assist with outreach .
Hope House	Sandy Ray (318) 487-2061 ceo@cenlahopehouse.org	501(c)(3) responsible for management, emergency shelter, transitional housing, and support services for battered women and children and will assist with community outreach and determining community needs of this sensitive population.
SafeAlex	James Woodley (318) 229-2633	City liaison to neighborhood and community groups and will assist with outreach to educate children within the target area.
Chamber of Commerce	Deborah Randolph (318) 442-6671	501(c)(3) works to open new businesses and assist business leaders in the community; liaison to state legislators and will assist with future reuse planning and financial and fundraising assistance .

iii. Incorporating Community Input: The City understands informing and gathering public input is essential to furthering redevelopment initiatives within a community. The City announced, in the *Town Talk* (print and online) and its social media outlets in October 2023 its intent to apply for this Brownfield Cleanup Grant application to remediate the Former Rush’s Cleaners site with the intent to redevelop the site into the Bolton Ave Mobility Hub. The Community Involvement Plan created during the recently awarded FY23 Assessment Grant Project (CIP) will be updated to explain planned community engagement activities, project schedule, project background and key players and will be made available for review at the City’s Community Development office. The planned community meetings and engagement activities will be held within the identified target area. During these planned community meetings and events, the City will record through meeting minutes all target-area residents’ input and suggestions given on the Brownfield Cleanup Project

and will evaluate the information during the quarterly project team meetings. The City will respond to all comments after the quarterly meeting on its social media account, and if additional follow up is needed, the City will contact the individuals to discuss their comments further. If residents provide additional input for site reuse, the City will address the input in site redevelopment plans and the overall City’s Brownfield Program goals.

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

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: Based on the previous investigations, site soil and groundwater are contaminated with VOCs. To address the contamination in these media, a draft ABCA was developed for the site that evaluated multiple alternatives including a no-action alternative. With consideration of effectiveness, implementation feasibility, and relative costs, the recommended cleanup alternative includes soil removal, and treatment of VOCs in soil and groundwater by chemical oxidation. Remedial activities at the site will be overseen by LDEQ for regulatory oversight purposes, with oversight costs paid from grant funds. VOC-impacted soils will be removed in the highest impacted areas to a depth of 15 feet below ground surface (bgs) to remove vapor intrusion concerns. VOCs in soils beyond 15 feet bgs will be treated by in-situ chemical oxidation, which will be directly applied in open excavations prior to backfilling and injected in the concentrated areas of impact. Dissolved VOCs in groundwater will be treated by in-situ chemical oxidation, which will be directly applied in open excavations prior to backfilling and injected downgradient from the excavations via direct-push methods. These actions will effectively eliminate the potential for exposure to impacted soils, remove ongoing sources of impact to groundwater, treat residually impacted groundwater downgradient from the source removal areas, and allow construction of new buildings over the residual impacted areas while addressing the potential for vapor intrusion.

b. Description of Tasks/Activities and Outputs

Task 1: Outreach	
i.	<i>Project Implementation:</i> The City’s Brownfield (BF) Program Director will update the existing Community Involvement Plan (CIP), outreach materials, brownfield project website, and social media posts with the assistance of the environmental contractor (EC). City staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created in 1 st quarter. Community Meetings held 2 nd , 6 th , & 10 th quarters. Website and outreach materials created in the 1 st quarter and posted monthly throughout the grant project.
iii.	<i>Task/Activity Lead:</i> City: Shirley Branham, BF Program Director
iv.	<i>Outputs:</i> Updated CIP, Update BF Website, 3 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
Task 2: Programmatic Support	
i.	<i>Project Implementation:</i> The City will procure an EC to assist with the project. The EC will assist the City in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. <u>The City has travel funding in their existing FY23-27 grant budget; therefore, this budget allows for two staff to attend only one event.</u>



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ii.	<i>Anticipated Project Schedule:</i> ACRES reporting begins 1 st quarter, and quarterly reporting begins 2 nd quarter and continues throughout the grant. Yearly reporting/forms created in the 5 th , 9 th , and 13 th quarters and final closeout.
iii.	<i>Task/Activity Lead:</i> City: Shirley Branham, BF Program Director
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend one conference.
Task 3: Cleanup/Reuse Planning	
i.	<i>Project Implementation:</i> The City’s BF Program Manager will oversee the EC as they finalize the ABCA, prepare QAPP and Health and Safety Plans (HASP), prepare final remedial action plan, and host visioning session.
ii.	<i>Anticipated Project Schedule:</i> Initiated upon award and funding of the grant 10/2024; QAPP and Final ABCA preparation 01/2025; Cleanup Plan approved by regulator 05/2025, Visioning Session conducted in 06/2025.
iii.	<i>Task/Activity Lead:</i> The EC will complete the technical aspects of the project with oversight from City: Mr. Keith Gremillion, BF Program Manager
iv.	<i>Outputs:</i> 1 Final ABCA, 1 Cleanup Plan, 1 Site Specific-QAPP & HASP, 1 Visioning Session.
Task 4: Cleanup Oversight	
i.	<i>Project Implementation:</i> The City will work with the EC as they manage the site cleanup activities, perform confirmation sampling, contractor oversight, cleanup reporting, and final remedial action report.
ii.	<i>Anticipated Project Schedule:</i> Oversight will follow Cleanup schedule. Final remedial action report 03/2027.
iii.	<i>Task/Activity Lead:</i> The EC will conduct cleanup oversight of the project.
iv.	<i>Outputs:</i> 1 cleanup report, 1 final remedial action report.
Task 5: Cleanup	
i.	<i>Project Implementation:</i> The City and EC will work with a remediation contractor as they perform site cleanup activities including contractor mobilization/demobilization and cleanup implementation.
ii.	<i>Anticipated Project Schedule:</i> Cleanup implementation 06/2025–12/2026
iii.	<i>Task/Activity Lead:</i> The remediation contractor will implement cleanup activities with oversight from EC and City: Mr. Keith Gremillion, BF Program Manager
iv.	<i>Outputs:</i> 1 site ready for reuse, 1 job for oversight, and 3 jobs for cleanup activities
Task 6: Administration	
i.	<i>Project Implementation:</i> City’s BF Program Director will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions.
ii.	<i>Anticipated Project Schedule:</i> 10/2024–09/2028
iii.	<i>Task/Activity Lead:</i> City: Shirley Branham, BF Program Director
iv.	<i>Outputs:</i> Procure EC and remediation contractor, ACRES Database Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period.

c. Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.* The budget for this project includes administrative, travel, supplies, contractual, and construction costs only. **Task 1 Outreach:** Contractual: Update Community Involvement Plan \$1,500 (10hrs x \$150); Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$3,000 (20hrs x \$150); 3 Community Education Meetings \$4,500 total (10hrs x \$150; \$1,500 each). Supplies: Outreach Supplies (paper/ink, printouts at \$1 each) \$1,000. **Task 2 Programmatic Support:** Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$18,750 (125hrs x \$150). Travel: Two staff to attend one conference \$3,500 (flights at \$550/each, 3 nights/each in hotel at \$200/night, incidentals and per diem at \$600 x 2 attendees). **Task 3 Planning:** Contractual: 1 Final ABCA \$3,000; 1 Visioning Session \$3,500; QAPP, HASP, Permitting \$7,500 (50hrs x \$150). **Task 4 Cleanup Oversight:** Contractual: Remediation oversight **\$60,000** (400 hrs x \$150); Soil confirmation sampling and laboratory analysis **\$10,500** (42 samples at \$250/sample); Monitoring well installation for quarterly post



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remediation confirmation sampling **\$22,400** (320 ft at \$70/ft); Post corrective action reporting to LDEQ **\$12,000** (80 hrs x \$150); Post-remediation groundwater monitoring and reporting – 8 quarterly monitoring & reporting events at \$8,000 per monitoring event for a total of **\$64,000** (200 groundwater samples at \$75/sample; 392 hrs x 125); Plugging and abandonment of monitoring wells **\$8,000** (320 ft at \$25/ft). **Task 5 Cleanup: Construction: Regulatory Oversight \$30,000** (300 hrs x \$100). **Surficial Soil Removal \$864,000:** contractor mobilization, soil excavation, transport, and disposal of fill soil \$741,000 (11,400 tons at \$65/ton); Clean backfill placement \$123,000 (8,200 yd³ at \$15/ yd³); Groundwater treatment placement and chemicals **\$153,400** (placement at \$3/lb and 11,800 lbs at \$10/lb chemical cost). **Task 6 Administrative: Personnel:** Direct costs for grant administration of \$20,000 (125 hrs x 4 years x \$40/hour)

Category	Tasks						Totals
	Outreach	Programmatic Support	Planning	Cleanup Oversight	Cleanup	Administrative	
Personnel						\$20,000	\$20,000
Travel		\$3,500					\$3,500
Supplies	\$1,000						\$1,000
Contractual	\$9,000	\$18,750	\$14,000	\$176,900			\$218,650
Construction					\$1,047,400		\$1,047,400
Total Budget	\$10,000	\$22,250	\$14,000	\$176,900	\$1,047,400	\$20,000	\$1,290,550

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

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

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

Ms. Branham has a bachelor's degree in architecture from Louisiana Tech University and has been employed with the City of Alexandria for over 15 years. During her time as Community Development Administrator, she has overseen many grant-funded programs, such as the US HUD, through CDGB and HOME. Mr. Gremillion has been with the city for six years but has over 40 years of experience in construction management and serves as the Multi-Trades Inspector for the city. He is responsible for defining and approving scopes of work, then ensuring field compliance with all federal, state, and local codes and regulations for various types of construction projects, including demolition. Mr. Johnson has over 20 years of experience working in local government and is proficient in the city's accounting software, online banking service, accounting, and payroll.

iii. Acquiring Additional Resources: Using local contracting requirements and procurement process, the City will procure a qualified environmental contractor to assist with technical and reporting portions of the Brownfield Cleanup project, in addition to any other contractors needed to complete the cleanup. The City will ensure compliance with the EPA's "Professional Service" procurement process. The City commonly procures contractors within the local area for a variety of construction services and has all systems in place to appropriately acquire any additional expertise and resources required to successfully complete the project.

b. Past Performance and Accomplishments i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments The City has received the following three previous assessment grants: 2008 Assessment Grant for Hazardous Substances in the amount of \$200k; 2009 Assessment Grant for Petroleum in the amount of \$200k; and 2020 Assessment Grant in the amount of \$300k. In FY23, the City was awarded a \$500k Assessment Grant. City staff assigned to oversee and manage the 2008 and 2009 grants are no longer employed by the City. Ms. Shirley Branham, the Brownfield Program Director, provided information that was to the best of her knowledge regarding the City's past performance. According to City records, a total of 10 Phase I Environmental Site Assessments (ESAs) and 5 Phase II ESAs were conducted, and 5 Quality Assurance Project Plans (QAPPs) were prepared between February 2009 and September 2014. Ms. Branham's team has successfully handled all aspects of the FY20 grant. This Assessment Grant completed 5 Phase I ESAs, 3 Phase II ESAs with Site-Specific QAPPs in the Old Town target area, a Community Involvement Plan, three community meetings, brochures and outreach materials, and a Generic QAPP. In addition, the City used their funding to create a community-led Brownfield Revitalization Plan (EPA Approved Planning Documents) that has shaped the future reuse and redevelopment of brownfields throughout the target area and beyond, including the reuse of the Former Rush's Cleaners site. All outcomes/outputs have been recorded in the ACRES database.

(2) Compliance with Grant Requirements For the 2008 & 2009 Grants, based on the Work Plan, the City outlined its objectives, budget, tasks, and overall quality assurance plan. In addition, the City also prepared a Quality Management Plan that clearly identified the team, manager responsibilities, organization, and other procedures to ensure that all activities under the grant program were completed. The current staff managed the FY20 grant and was facilitated in strict conformance with the Work Plan and complied with required schedules implemented by the US EPA for on-time submittal of quarterly reports, ACRES reporting, and deliverable submittals. This grant successfully drew down to a zero-dollar balance and closeout documents are being prepared in November 2023. The current open grant recently awarded to the City was started on October 1, 2023, with a project end date of September 30, 2027. The City was allowed a pre-award cost of the Phase I ESA and is currently working with their EPA Project Officer to finalize contractual and administrative documents for the cooperative agreement.