



COMMUNITY INVOLVEMENT/RELATIONS PLAN

**Small Business Liability Relief and Brownfields Revitalization Act
U.S. EPA CERCLA Section 128(a)
State Response Program Cooperative Agreement # RP-00E14605-0**
Former Muncie Paper Processing Property
701 West 23rd Street
Muncie, Delaware County, Indiana
Brownfield Site ID: 4010016
May 2012

OVERVIEW

The Indiana Finance Authority (IFA), through the Indiana Brownfields Program (Program), in cooperation with the City of Muncie (City), the Delaware County Commissioners, the Delaware County Redevelopment Commission, and the Muncie-Delaware County Economic Development Alliance (County), has prepared this Community Involvement/Relations Plan (CRP) for 128(a) funding for the cleanup of the Former Muncie Paper Processing Property located at 701 West 23rd Street in Muncie, Delaware County, Indiana (Site). The County applied to the Program for assessment and cleanup funding for the Site which will facilitate Site reuse for commercial/industrial purposes. The CRP is in accordance with the Program and U.S. Environmental Protection Agency (U.S. EPA) guidelines to help satisfy the public notice requirements of the IFA's cooperative agreement with the U.S. EPA.

The community utilizing 128(a) federal funding for cleanup activities must provide the public with an opportunity to provide input on site cleanup and plans for redevelopment. The public must also have the opportunity to comment on the various required documents drafted in preparation for the environmental cleanup, and any comments must be considered as part of final cleanup decisions. The community must adhere to the following public notice requirements:

- Establishment of a local Information Repository at or near the site(s) that includes public information supplied by both the IFA and the community related to the proposed response action;
- Administrative Record (collection of documents explaining the actions taking place at a site) that is available to the public;
- A remediation work plan (RWP) is part of the Administrative Record/Information Repository for public view;
- An Analysis of Brownfields Cleanup Alternatives (ABCA) document that identifies the remedial alternatives that were considered is part of the Administrative Record/Information Repository for public view;
- A response document from the State Historic Preservation Officer (SHPO) regarding results of a National Historic Preservation Act (NHPA) review for the

subject site is part of the Administrative Record/Information Repository for public view;

- A site-specific CRP, including reasonable notice in a major local newspaper of general circulation, on the internet, or similar measure to target the general community and targeted area of the availability of documents for public view;
- Opportunity for involvement and allowance of adequate public comment periods, at least a 30-day notice;
- Response to public comments (summarized and documented in a decision memo or equivalent document) for the Program to decide on the proposed response action; and,
- Arrangement for information on the remediation findings and the proposed response action to be disseminated to the community in the surrounding affected area.

The purpose of this CRP is to explain strategies which will address communication of information to and involvement of the citizens of Delaware County, Indiana, particularly the residents directly or potentially affected by proposed environmental response actions on the Site. The CRP outlines how Delaware County has involved, should involve, and will continue to involve affected residents, City and County officials, and local organizations in the decision-making process regarding the environmental remediation efforts at the Site proposed for remediation and redevelopment.

The County is responsible for implementing the CRP with respect to Site environmental response activities. Active residents and institutions in the community are essential resources for the success of the CRP because they hold positions of responsibility within the community, and these citizens and organizations should be key points of contact and communication. The success of the environmental remediation and subsequent redevelopment of the Site hinges on informed citizen involvement in each step of the remediation and redevelopment process.

The County is primarily responsible for community notification and involvement during the redevelopment project regarding response actions and federal funding for Site activities. The County must notify residents or community groups in close proximity to the Site if impacts or activities at a Site are likely to affect them. Environmental response actions on-Site are anticipated to be funded, in part, by approximately \$56,000 in 128(a) federal funding from the IFA. The Program will use federal funds to oversee an environmental consultant to remediate environmental impacts at the Site by removing contaminated soil.

Effective community involvement improves the chances for a long-term, sustainable brownfield project. Early community involvement is equal to cost-effective planning. Implementation of the CRP should be transparent and flexible.

SPOKESPERSON FOR INFORMATION REPOSITORY

The spokesperson for this federal funding is Mr. Brad Bookout, who may be contacted as noted below:

Brad Bookout
Delaware County Redevelopment Commission
401 S. High Street
Muncie, Indiana, 47305
Phone: 765-751-9133
Email: bbookout@muncie.com

INFORMATION REPOSITORY LOCATIONS

The main Information Repository, which contains the Administrative Record for site response actions, is located at:

Delaware County Redevelopment Commission
401 S. High Street, 2nd Floor
Muncie, Indiana, 47305
Hours: Monday through Friday, between 8:00 am and 5:00 pm

Alternate Information Repository to accommodate viewing after 5:00 pm:

Maring-Hunt Library
2005 S. High Street
Muncie, Indiana, 47302

The Administrative Record can be accessed by personal request at the public counter of the Delaware County Redevelopment Commission and local library.

The Administrative Record for the Site is also available through the Indiana Department of Environmental Management's (IDEM's) Virtual File Cabinet (VFC) on the Internet at: <http://12.186.81.89/Pages/Member/EnhancedSearch.aspx>, searching by Brownfields Site # 4010016, or the address of the Site.

SITE LOCATION

Former Muncie Paper Processing Property
Indiana Brownfields Program Site #: **4010016**
Street Address: **701 West 23rd Street**
City: **Muncie, Indiana** Zip: **47305** County: **Delaware**
Tax Parcel Identification #: **11-21-451-003-000**

SITE BACKGROUND

The 13.32-acre Site is located at the corner of 23rd Street and Garkhey Street in a mixed residential, commercial, and industrial area of the south side of Muncie, Indiana. The Site is currently vacant and heavily vegetated. Remaining on-Site are the concrete foundations that supported the on-Site structures that were demolished by the County in 2000. Several vaults are also present on-Site, along with areas where shredded paper has been dumped. See Attachment A.

Historic Site uses include: Muncie Paper & Pulp and Dauch Paper Company from 1892 to the 1940s; Goodyear Tire and Rubber Metal Parts facility in 1950s through 1960s; Jordan Paper Products in 1987; and Muncie Paper Processing in 1992. The Site was most recently used as a paper recycling center. Operations ceased in 1999. The Site is currently owned by the Delaware County Board of Commissioners which acquired the Site by Tax Title Deed on January 25, 2000.

A Phase I Environmental Site Assessment was completed in August 2009, followed by a Phase II Site Assessment in September 2009. A Phase II Limited Subsurface Investigation was completed in August 2011, with a subsequent Phase II Further Site Investigation in September 2011. Environmental assessment activities to date have identified hazardous substances in soil at the Site, specifically arsenic in soil at concentrations exceeding the Indiana Department of Environmental Management (IDEM) former Risk Integrated System of Closure (RISC) Industrial Default Closure Levels (IDCLs). In addition, lead has been detected in soils at concentrations exceeding former RISC Residential Default Closure Levels (RDCLs). The known contaminants of concern on-Site which include chlorinated volatiles, semi-volatiles, and metals, in soil, are consistent with the historical paper and pulp processing and rubber tire production conducted at the Site.

Generally, compared to three potential remediation alternatives considered, the most feasible and appropriate technical approach to remediating the soil and redevelopment of the Site is through soil excavation activities and institutional controls, which is the most protective option for construction workers and future site occupants under IDEM's *Remediation Closure Guide (former IDEM RISC Technical Resource Guidance Document)* dated March 22, 2012. Soils will be transported and disposed at a special waste landfill in Jay County, and on-Site confirmatory samples will be collected. A remediation report will be submitted to the Program upon completion of the remedial activities.

REDEVELOPMENT PLANS

The Delaware County Redevelopment Commission currently owns the Site and intends to redevelop it for commercial/industrial use at this time.

NATURE OF THREAT TO PUBLIC HEALTH AND ENVIRONMENT

Based on the findings of the Site Environmental Site Assessments, the former industrial Site has detected hazardous substances in soil from the Site's previous paper processing operations. The Site is not located within the City of Muncie wellhead protection area. Human health impacts to future site occupants and construction workers are possible from current Site conditions. Impact to wildlife and ecology, though remote, are also possible from current Site conditions. However, the Site does not pose an imminent threat to human health or the environment.

The on-Site arsenic and lead that will be addressed are not volatile and thus do not pose a threat for vapor intrusion. Vapor intrusion in new on-Site buildings in the future may still be a concern from Volatile Organic Compounds (VOCs) in the groundwater. Consequently, this exposure pathway has not been completely eliminated, but will be addressed separately as necessary.

Since the majority of the Site does not have engineered barriers (i.e., asphalt or concrete) and the on-Site metals have predominantly been detected in soil samples obtained from the surface (0-0.5 feet BLS) or shallow subsurface (0.5 – ~9.0 feet BLS), soil exposure through direct contact, inhalation (vapors or soil particles), or ingestion of impacted soil by future Site occupants or construction workers are the primary potential exposure pathways which may be viable.

The Site is enrolled in the Program. The Program will continue to provide oversight of remediation activities. Remedial actions will be focused primarily on soil removal/disposal at an approved landfill; Site monitoring activities necessary during the cleanup process; and cleanup verification and confirmation sampling.

Since the future redevelopment plans indicate that the Site will be developed for commercial/industrial purposes, the most applicable cleanup standards are Industrial/Commercial Direct Contact Screening Levels for Soil Exposure, as outlined in Table A-6, Appendix A, of IDEM's *Remediation Closure Guide* dated March 22, 2012.

COMMUNITY BACKGROUND

The Site is located in a mixed residential, commercial, and industrial corridor on the south side of Muncie. The community is poised for redevelopment opportunities, including this industrial/commercial redevelopment project, to help stimulate its local economy.

The County has benefited from 128(a) federal funding for Site assessment activities and has applied to U.S. EPA for cleanup funding to supplement Site remediation costs. The County needs additional funding from the IFA to facilitate the remediation and reuse of this former industrial Site. With this federal funding, the Site will be usable for its intended commercial/industrial redevelopment purposes.

Local leaders involved with these redevelopment efforts include the City of Muncie, the Delaware County Commissioners, the Delaware County Redevelopment Commission, and the Muncie-Delaware County Economic Development Alliance.

CHRONOLOGY OF COMMUNITY INVOLVEMENT

The Site has been a topic at County meetings. All County board meetings are open to the public. City and County officials and public bodies (Mayor and City Council) will be kept apprised of the status of the project by means of internal progress reports. All reports are public documents and will be provided as requested.

Community involvement has been an ongoing element of the City's/County's redevelopment efforts and will continue to be a priority. Prior to applying to the IFA for 128(a) federal funding for Site remediation, the County has involved its community members in part because of other state and federal funding it has sought/received. The County has/will inform the public through flyers, news articles, meetings and published meeting notes. The County has/will solicit input through advisory committees/groups, Site visits, and meetings with key community representatives.

To comply with U.S. EPA's 30-day public notice/comment period prior to the anticipated summer field work activities, the County will prepare a legal ad for the RWP to run from mid May 2012 to mid June 2012 (exact dates to be determined). The City legal ad(s) will reference the ABCA and the SHPO response, as well as this CRP, in the designated local public repositories for review. The County plans to compile/address any comments prior to 128(a)-funded remediation activities.

CONTINUED COMMUNITY INVOLVEMENT

The County is committed to maintaining community involvement for the Site cleanup and redevelopment process. The County has and will dedicate necessary staff time to complete such administrative requirements. The County may also dedicate in-kind services as dictated by the ultimate redevelopment plans for the Site. Community involvement activities will continue to include: public meetings/hearings on cleanup financing initiatives, local approvals of key brownfield financing and cleanup milestones in public meetings, public input throughout the Site plan review and approval process, and maintenance of the public repository of key documents.

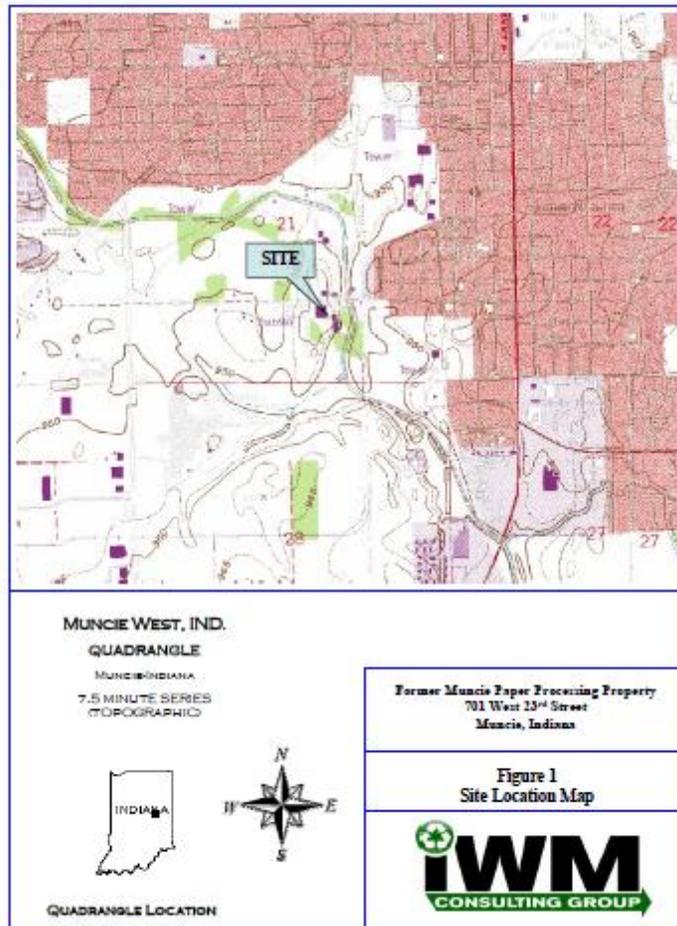
Key local officials and community members will be updated on a regular basis at the public meetings. Opportunities for continued public participation in decisions concerning environmental response actions at the Site and the City's/County's intentions for 128(a) federal funding will be provided primarily through public notices and meetings. The County will engage all informational activities in the community.

In conformance with U.S. EPA guidelines and Act 381 requirements, public notices will be published and disseminated, public comments will be received and evaluated, public hearings may be conducted, and documents and plans will be approved by public bodies in public session prior to initiation of response actions at the Site. The County will utilize the following web site <http://muncie.com/> and published notices in the local newspaper to inform the community about agendas, meeting minutes, requests for proposals, etc., but cannot accommodate large documents. While the County does not anticipate issuing any newsletters, following is a list of the types of public notices, hearings, and sessions to be published:

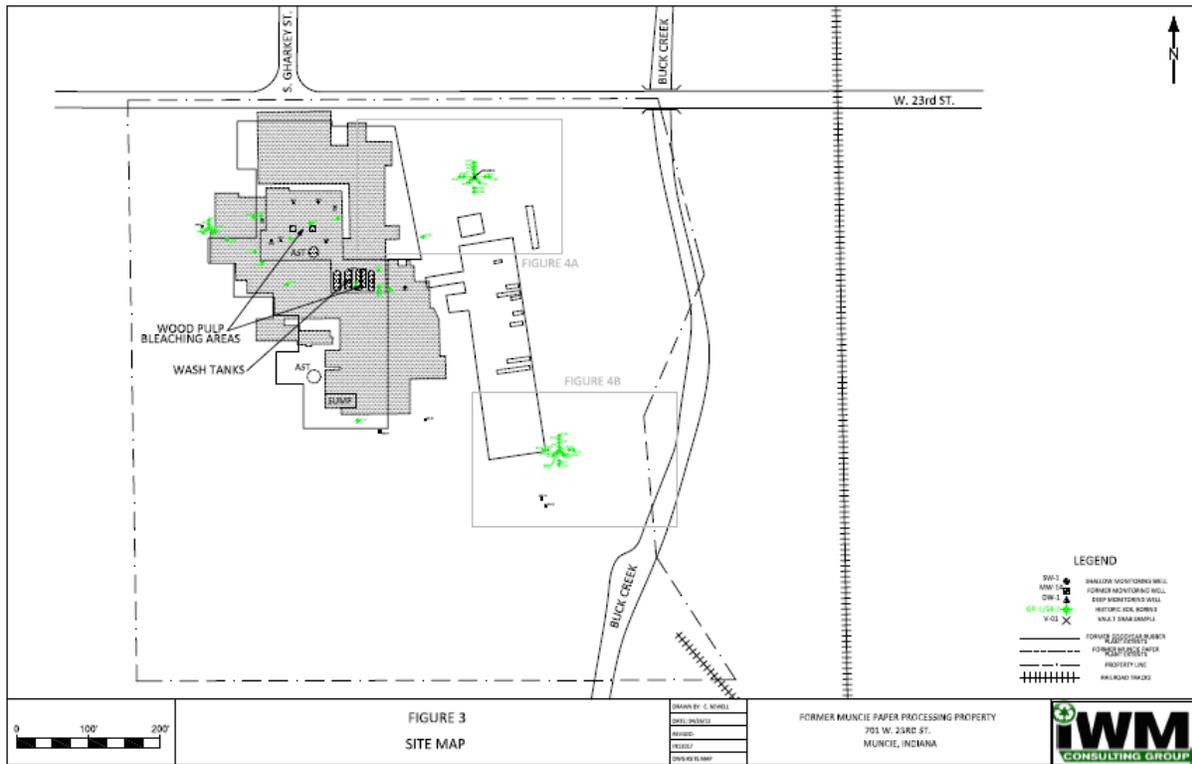
- notice announcing document information repository and response actions;
- notice announcing the availability of the Administrative Record including the CRP, the RWP, the ABCA, and other relevant Site documents for a 30-day comment period;
- notice announcing public hearing(s) and/or meeting(s);
- public meeting(s) and/or public hearings (s) for comments/approval on Site plans.

The document information repositories will be maintained and updated throughout the environmental response action phase of Site redevelopment.

ATTACHMENT A MAPS/DIAGRAMS/PHOTOS



ATTACHMENT A (cont.) MAPS/DIAGRAMS/PHOTOS



**ATTACHMENT A (cont.)
MAPS/DIAGRAMS/PHOTOS**



Entrance Looking North—Hartley Truck Parts

**ATTACHMENT A (cont.)
MAPS/DIAGRAMS/PHOTOS**



Entrance of Property — Looking South

**ATTACHMENT A (cont.)
MAPS/DIAGRAMS/PHOTOS**



West Foundation — Looking North