

**COMMUNITY RELATIONS PLAN
FOR
28 DAVIDSON AVENUE
ELRAMA, UNION TOWNSHIP,
WASHINGTON COUNTY, PENNSYLVANIA**

Prepared for:
**UNION TOWNSHIP
3904 FINLEYVILLE-ELRAMA ROAD
FINLEYVILLE, PENNSYLVANIA 15332**

AND

**REDEVLELOPMENT AUTHORITY OF THE COUNTY OF WASHINGTON
100 WEST BEAU STREET, SUITE 603
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1.0 Overview

The purpose of the Community Relations Plan (CRP) is to describe the Project Site's Geographic location and the strategy of Union Township, Washington County, Pennsylvania to address the needs and concerns of the residents potentially affected by the environmental cleanup of contamination present at the former Classic Auto Restoration Services of Pittsburgh Site, aka the Former Elrama Chrome Shop Site (Site). The CRP outlines how Union Township will involve affected residents, Union Township officials and local organizations in the decision-making process regarding the environmental cleanup at the Site.

It is the intention of the CRP to involve residents that have been active in the history of the Site as well as other relevant stakeholders and government officials who have a comprehensive understanding of the community, its interests, and priorities. The success of the environmental cleanup and subsequent redevelopment of the former Site relies on informed citizen involvement in each step of the clean-up process.

The cleanup activities of this site will be undertaken utilizing funds obtained through the Washington County Brownfield Revolving Loan Fund Program, which is federally funded by the United States Environmental Protection Agency (U.S. EPA).

The BRLF Loan Borrower, Union Township, has entered into a loan agreement with the Redevelopment Authority of the County of Washington (RACW). In addition to the terms of the loan, the agreement provides for Union Township and the RACW to monitor the environmental cleanup of the site.

2.0 Spokesperson and Information Repository

The contact information for the spokesperson for this project is as follows:

Susan Morgan
Brownfields and Municipal Planning Manager
Redevelopment Authority of the County of Washington
100 West Beau Street, Suite 603
Washington, PA 15301
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An Information Repository is located at the RACW Office at the above address.

3.0 Site Description and History

3.1 Site Description

The Site is located at 28 Davidson Avenue in Elrama, Washington County, Pennsylvania and encompasses approximately 0.5 acre (21,000 square feet) of vacant, former commercial land. The Property is recorded in the Washington County Tax Assessment as Parcel Number 640-007-04-03-0014-00. There are currently no structures on this Site. The Site is situated on the southwest side of

Davidson Avenue in a primarily residential area. The parcel is covered with vegetation the exception of an area of crushed stone along Davidson Avenue, and generally slopes from northwest to southeast towards the Pennsylvania American Water facility and the Monongahela River.

3.2 Site History

Prior to 1947, the Site was vacant, undeveloped land. From 1947 to 1981, the Site was owned by John Drechsler and operated as the Drechsler Cabinet Company. In 1981, the Site was sold to David and Aimee Kogut, under whose ownership it was leased to several businesses. Following closure of the cabinet shop in 1981, the Site was vacant for a number of years until the mid-1990s. In 1995, the Site was leased and operated as Seebacher's Plating Mill. This Site was used in this manner until 2000. Beginning in September 2000, the Site was owned and operated Boyle's Metal Polishing and Finishing. In May 2003, the Site was sold to Classic Auto Restoration Services (CARS), a specialty electroplating facility, primarily for car parts. CARS operated on the Site until November 2004, after which the facility was abandoned. The Site thereafter was neglected and became tax delinquent. In 2009, Mr. Marion Vincent Eggleston purchased the Property at a tax sale as vacant land. In June 2013, the Property was sold to Improper Properties, LLC, again by the Washington County Tax Claim Bureau for the non-payment of taxes. Union Township subsequently acquired the Site from Improper Properties, LLC, and is the current owner.

4.0 Past Environmental Investigations, Cleanup and Remediation

The Pennsylvania Department of Environmental Protection (PADEP) conducted two interim responses pursuant to the Hazardous Sites Cleanup Act (HSCA), one beginning in 2005 and the second in 2010. The two responses removed hazardous waste, contaminated soils, and the structure from the Site.

4.1 2005 Interim Response

The 2005 investigation conducted by the PADEP included the following:

- Advancement of 18 soil borings (SB-1 through SB-18). Collection of soil samples from shallow (1-3 feet), intermediate (5-7 feet), and deep (9-16 feet) intervals at each respective soil boring location. The total metals that exceeded the Pennsylvania Land Recycling and Environmental Remediation Standards Act's (Act 2) medium-specific concentrations (MSCs) for soil included arsenic, cobalt, and iron. Arsenic exceeded the MSC at 10 sample locations, cobalt exceeded the MSC at 47 sample locations, and iron exceeded the MSC at two sample locations.
- Installation of piezometers in five of the soil borings (SB-1, SB-4, SB-5, SB-12, and SB-13). Resulting groundwater flow direction was determined to be east. Groundwater MSCs were exceeded for nitrates at PZ-2 and PZ-4 and for nickel at PZ-2.
- Installation of four monitoring wells (MW-1 through MW-4). Samples were analyzed for total and dissolved metals, volatile organic compounds, cyanide, hexavalent chromium, and semi-volatile organic compounds. Groundwater MSCs were only exceeded for antimony in MW-3 and arsenic in MW-1 and MW-3.
- Shipment of 42.76 tons of non-hazardous bulk solid waste and 342 containers off the Property.

- A septic investigation in November 2005 to locate the on-site sewage system. The septic tank and its contents were removed. The cavity remaining was filled with gravel to meet existing grade.
- Collection of cistern water samples which exceeded Surface Water Quality Criteria and groundwater MSCs for sulfates, dissolved cadmium, chromium, and nickel, and for total barium and nickel. As a result, 4,000 gallons of water were pumped out of the cistern and it was backfilled with gravel as a safety measure.
- Collection of pit well water samples which exceeded the MSCs for hexavalent chromium, nitrates, aluminum, antimony, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, silver, and zinc. As a result, liquid in the pit well was removed and it was filled with cement to ground surface.

4.2 2010 Interim Response

The 2010, Interim Response included the demolition of the building (including the floor slab and footers), excavation of contaminated soil, and site restoration. A total of 72 loads of demolition debris, 96 tri-axle loads of non-hazardous material, and 11 tri-axle loads of chromium contaminated soil were shipped for disposal. Fifteen confirmation samples were subsequently collected from locations where the suspected waste was removed in order to confirm attainment criteria were achieved. An Environmental Covenant was recorded on the deed on August 5, 2011 by the PADEP, that includes Activity and Use Limitations (AULs) as follows:

- The use or consumption of groundwater located on or beneath the Property is prohibited;
- The Property may be used for commercial purposes. In no event shall any portion of the Property be used for residential purposes, nor shall the Property be used as the location for a nursing home, school, or other residential-style facilities;
- Excavation and removal of soils and/or waste materials from the Property is prohibited;
- The construction of a commercial building on the Property is permitted, provided that the following conditions are met: 1) the building must be built on a slab, 2) if excavation of soils and/or waste is required for construction, the affected soils and/or waste shall be sampled and properly handled according to sample results, 3) the PADEP is provided with notice of the construction at least 6 months before construction of a building commences, and 4) the PADEP is provided with sample results of any excavated soil and/or waste;
- Removal of the vegetative cover from the Property is prohibited unless a cap or cover is installed to prevent soil erosion; and
- Use of the Property that is inconsistent with or will negatively impact the investigative or remedial measures undertaken by the Department is prohibited.

4.3 2015 Phase I Environmental Site Assessment

In November of 2015, a Phase I ESA was conducted in conformance with the scope and limitations of ASTM Standard E 1527-13 of 28 Davidson Avenue in Elrama prior to the acquisition of the Site by Union Township. This assessment revealed Recognized environmental conditions (REC) related to the

historical usage of the Property as a chrome plating facility, contaminated soils and potentially groundwater at the site. Additionally, an Environmental Covenant and AULs exist for the Property limiting potential future exposure to hazardous materials at the site. This represents a CREC for the Property.

5.0 Nature of Threat to Public Health and Environment

The present condition of the Site poses an ongoing threat from potential direct contact or ingestion of site soils. According to the PADEP's 2007 End of Project Report, numerous chemicals remained on the Site including corrosives, oxidizers, poison including arsenic and cyanide, and metals such as nickel, chromium, lead, cadmium, and copper. Hexavalent chromium is a recognized carcinogen. Because of its adverse effects on human health and the environment, use and exposure to hexavalent chromium represents potential occupational safety risks as well as risks to residents and sensitive populations in the area of the Site. Subsequent to the second Interim response in May 2011, the PADEP issued an Administrative Order which notes that contaminated soil and other hazardous substances may still remain on the Site beneath the vegetative cover, including the area where the building was formerly located. The Order suggests that the possible contamination could pose a threat of release which could impact public health and the environment.

6.0 U.S. EPA Relationship to the Site

A Phase I Environmental Site Assessment of the Site was conducted in 2015 using U.S. EPA Brownfields Assessment funds from the RACW Brownfields program. U.S. EPA's relationship to the current project will be to assist in funding the remediation of the property in accordance with Federal, State and Local Laws. The PADEP and the U.S. EPA operate under a "One Cleanup Program" agreement, which established a framework for coordinating voluntary cleanups under the Land Recycling Act and other federal statutes, including the Resource Conservation and Recovery Act (RCRA). This agreement is designed to promote the cleanup and redevelopment of sites subject to RCRA corrective action by resolving both federal and state liability for cleanup at the same time. The cleanup of the Site will be conducted under the terms and spirit of this agreement.

Also, the U.S. EPA conducts ongoing monitoring of the Elrama Power Station, a closed coal power plant owned by GenOn Power Midwest, LP, a subsidiary of NRG Energy, Inc. located approximately 1,000 feet to the northeast of the Site in Elrama. The Elrama Power Station was permanently shut down in October of 2012. Most recently in 2013, the U.S. EPA conducted an assessment of the coal combustion waste impoundment units, including a containment dam safety assessment. The U.S. EPA assessment found some of the containment structures to be deficient and recommended maintenance and corrective actions be implemented to protect public safety and the environment from possible contamination due to failure of containment structures. U.S. EPA will continue to conduct periodic monitoring at the idled facility.

7.0 Relevant Community Priorities

The reuse of this brownfield Site as a new recreational asset is entirely consistent with the Union Township Joint Comprehensive Plan which was adopted by the Township in November of 2012. Union Township acquired the Site specifically to address limited recreational opportunities the Township, and specifically in the Elrama Neighborhood. The Township is pursuing the reuse of the Site as a playground

for the neighborhood. The Site has been an unproductive nuisance for the neighborhood since it closed in 2004. Union Township has two municipal parks – the Union Township Recreation Center on Brownsville Road and a small park on Jason Drive. The Union Township Joint Comprehensive Plan has a specified goal for Union Township to “Improve the quality of life for planning region residents by increasing or expanding recreational resources and opportunities.” A relevant objective to achieve this goal as stated in the Comprehensive Plan is to “Investigate the feasibility of redeveloping brownfields for recreational uses.”

8.0 Environmentally Sensitive Populations

Elrama, Pennsylvania is a Census-Designated Place, and according to the 2015 American Community Survey (ACS) had a localized population of 290 people. Also, according to the 2015 ACS, approximately 24% of the population in the area impacted by the brownfield live below the poverty level.

Environmentally sensitive populations include the elderly, women of child-bearing years, and the very young. Nearly 60% of the residents in Elrama are over 60 or younger than 14. Specifically, 35.2% of the population is over the age of 60, and 22.8% of the population are children below the age of 14. Fifteen percent of the local population is comprised of women of child-bearing years. These segments of the local population are considered to be most vulnerable to the effects of environmental contamination in the area impacted by the site and collectively comprise approximately 75% of the local population in the Elrama neighborhood impacted by the Site.

9.0 Site Cleanup and Reuse Goals

The goal of the Former Elrama Chrome Plating Site cleanup project is to finalize the remediation of the site by confirming the effectiveness of active remediation measures previously conducted under the supervision of the PADEP, augmenting it if necessary and then attaining an Act 2 release from liability from the PADEP under a residential standard to permit the reuse of the site as a neighborhood playground. The existing Environmental Covenant will not allow the Site to be used as proposed, so the goal is to demonstrate to the PADEP the attainment of a Site-Specific Standard that will permit that use, and remove or amend the Covenant, as necessary. As previously described, the planned cleanup activities are intended to enable Union Township to reuse the Site for the construction of a neighborhood playground.

10.0 Community Involvement and Key Community Concerns

Community involvement in site remediation has been conducted in the context of the two Interim Response actions taken by the PA DEP in the 2005 and 2010 timeframes. A public hearing was conducted with respect to the first Interim Response on January 17, 2005, and the PA DEP Administrative Record was open for public comment from December 17, 2004 until February 17, 2005. A public hearing was conducted with respect to the second Interim Response on June 23, 2009, and the PA DEP Administrative Record was open for public comment from May 9, 2009 until June 23, 2009. The project has been discussed and actions taken with respect to the acquisition and remediation of the Site at regularly scheduled public Township Supervisors’ meetings. The receipt of a PA Industrial Sites Reuse Grant for the assessment and Act 2 closure of the Site was publicly posted on the Union Township website on January 12, 2017. There have been no public concerns expressed related to the proposed cleanup and reuse of the site.

11.0 Continued Community Involvement

A notice will be posted on the Union Township <http://uniontwp.psatstwp.org/> and the RACW <http://www.racw.net/> websites announcing the intended clean-up of the Site. In conformance with the Brownfield's Revolving Loan Fund requirements as related to site clean-up, the posted notice will also announce that the information repository on this project including the environmental assessments, risk assessments and other environmental information is located at the RACW offices and is available for viewing during normal business hours. The notice will also announce the start of a 30-day comment period on the engineering analysis for the remediation and clean-up of environmental hazards on the Site. Union Township and the RACW will accept comments on the plan during the comment period and will provide written responses which will become part of the official record for the project. Regular updates of activities will be posted on both websites. Notices will also be posted to notify interested individuals of opportunities to provide input during the remediation process. Union Township will also use its regularly-published community newsletter to provide the public with project update and notify them of any opportunities for input during the environmental cleanup of the Site. The project information repository located at the Union Township's Office, will be updated to include all information shared via the means described, and will also include any feedback from the community, and Union Township's response to any feedback or inquiries.