

**The City of the Village of Douglas
86 West Center Street, P.O. Box 757
Douglas, Michigan 49406-0757**

**U. S. Environmental Protection Agency
Brownfield Cleanup Grant Program
Work Plan**

**Former Haworth Manufacturing Site
200 Blue Star Highway, Douglas
Allegan County, Michigan 49406**

June 9th, 2022

Table of Contents

I.	Proposed Outputs and Outcomes	1
II.	Introduction and Environmental Results	1
III.	Project Overview	2
IV.	Management and Coordination	2
V.	Work to be Performed	2
	Task 1A: Procuring Environmental Consulting Services	2
	Task 1B: Community Involvement.....	Error! Bookmark not defined.
	Task 2: Cleanup Planning	Error! Bookmark not defined.
	Task 3: Cleanup Activities	Error! Bookmark not defined.
	Task 4: Grant Management.....	Error! Bookmark not defined.
VI.	Remediation Goals for the Project.....	1
VII.	Cost Estimates	Error! Bookmark not defined.
	A. Budget	Error! Bookmark not defined.
	B. Description of Activities/Tasks and Outputs	Error! Bookmark not defined.
	Task 1: Community Involvement	1
	Task 2: Cleanup Planning	2
	Task 3: Cleanup Activities	2
	Task 4: Grant Management.....	2

**Former Haworth Manufacturing Site
USEPA Brownfield Cleanup Grant Work Plan
200 Blue Star Highway, Douglas, Michigan**

Cleanup Grants

This project supports Goal 1 in EPA's FY 2018-2022 Strategic Plan, which is to deliver "a healthier, cleaner environment by delivering a cleaner, safer, and healthier environment for all Americans and future generations by carrying out the agency's core mission", by revitalizing land and preventing contamination (Objective 1.3). Specifically, the recipient will carry out cleanup activities to encourage revitalization and reuse of brownfields sites. The Project Period is 3 years.

Catalog of Federal Domestic Assistance Number (CFDA): 66.818
RFP Number: EPA-OLEM-OBLR-21-06

**The City of the Village of Douglas
Project Contact:**

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Project Period: 10/01/2022 - 09/30/2025

I. Proposed Outputs and Outcomes

Grant funds will be used to complete environmental remediation of hazardous substances contamination at the former Haworth Manufacturing Site, a 7.18-acre site located at 200 Blue Star Highway in the City of Douglas (“the City”).

The primary expected outcome is the eventual cleanup and redevelopment of this property. Preliminary conceptual plans include an estimated 80,000 square feet of commercial retail and restaurant space over 7 two-story buildings, and 52,000 square feet of live-work space over 2 buildings. Several elements of the initial site design concept address the City’s placemaking goals, including the preservation of the City’s character as a quaint destination community. These features involve incorporating larger building setback distances, the relocation of parking areas behind the proposed buildings, and implementing streetscape improvements that are in accordance with the City’s greenspace and tree ordinances. The preliminary conceptual plan also incorporates placemaking features that includes approximately 800 feet of bike lane along the Blue Star Highway, and 700 feet of sidewalk improvements along Ferry Street.

II. Introduction and Environmental Results

The United States Environmental Protection Agency (U.S. EPA) has awarded the City of the Village of Douglas, Michigan, a Brownfield Cleanup Grant to conduct remediation activities associated with the 7.18-acre former Haworth Manufacturing Site located at 200 Blue Star Highway in the Village of Douglas. The \$500,000 grant will be dedicated to removing hazardous substances contamination from the site.

The target property consists of a single parcel that was initially developed as a fallow orchard with two small structures as early as 1938. By the 1940s, the property was redeveloped into its current configuration, which consists of two utility buildings and a 150,300 square foot, single-story industrial building with approximately 15 truck bays facing Blue Star Highway. From the 1940’s through the mid-1970’s the property’s extensive history included plating, buffing, zinc die casting, metal forming, stamping, phosphatizing, and painting metal parts. Between the years of 1976 and 2014, the property was owned and occupied by Haworth Inc. (formerly Haworth Manufacturing) who used the facility to manufacture furniture. Since 2014, the site has been vacant.

To assist in leveraging funding opportunities for cleanup and redevelopment, the City acquired the target property in 2019. In 2015, Phase I and II Environmental Site Assessments (ESAs) were conducted to review previous assessments and investigate contamination from polychlorinated biphenyls (PCBs) and volatile organic compounds (VOCs) beneath the building, as well as evaluate pathways related to vapor intrusion. Sampling conducted in the former die cast pit area (eastern portion of the building) identified concentrations of PCBs above one part per million (ppm). Analytical data also suggests that trichloroethene (TCE) contamination exceeding Michigan’s Residential and Nonresidential Drinking Water, Groundwater Surface Water Interface, and Groundwater Volatilization to Indoor Air cleanup criteria, has migrated approximately 1,600 feet north-northwest of the target property, offsite.

In May 2018, a Remedial Alternatives Evaluation (RAE) was conducted to determine options to address the risks associated with the known VOC contaminated groundwater and PCB contaminated soil. The RAE also summarized the results of previous site investigations that were conducted between 2015 and 2017 to define the horizontal and vertical extent of PCB contaminated soil impact. These investigations identified soils impacted by PCBs at concentrations ranging from 3.4 ppm to 5,600 ppm, which are above the Toxic Substances Control Act (TSCA) Subpart D Cleanup Standard for high occupancy areas. The horizontal and vertical extent of the PCB impact were determined to be in the north central and eastern portions of the east room of the building, at depths ranging from 1’ to 15.5’ below ground surface (bgs). A cleanup strategy was prepared that involves addressing the contamination from the source areas on the target property by first addressing the PCB contamination. This approach will assist in eliminating one of the concerns identified and as a result, in conjunction with other leveraged sources, better position the property to be marketed for redevelopment.

In 2022, the City demolished the building to prepare for PCB cleanup activities. The floor and paved areas were left in place to serve as a cap to the contamination below.

III. Project Overview

U.S. EPA has awarded the City of Douglas \$500,000 for the cleanup of hazardous substances at the former Haworth Manufacturing Site.

The project involves the utilization of a risk-based cleanup approach for the PCB contamination using the TSCA Subpart D Cleanup Standards for high occupancy uses. Prior to the commencement of cleanup activities, a risk based TSCA PCB Cleanup work plan will be prepared for EPA review and approval. Since the state of Michigan does not have its own TSCA program, the City has already engaged EPA TSCA staff and has started the process of outlining a preliminary approach to preparing the risk based TSCA PCB Cleanup work plan for high occupancy uses based on the available existing data. Cleanup activities are expected to include the disposal of approximately 1,670 tons of contaminated soil, approximately 460 tons of contaminated concrete, the import and placement of approximately 1,000 cubic yards of clean fill material, and the installation and maintenance of an appropriate surface cover consisting of a 10" compacted clay cap over an estimated 8,275 square foot area. Contaminated materials will be transported to a licensed facility capable of meeting applicable disposal requirements.

The following tasks comprise the City of Douglas Cleanup Grant project:

1. Community Involvement and Outreach
2. Cleanup Planning
3. Cleanup Activities
4. Grant Management

IV. Management and Coordination

Project management and grant administration responsibilities will be handled by the City Manager of the City of Douglas, Mr. Rich LaBombard. As the City Manager, Mr. LaBombard oversees the day-to-day operations of the City which includes, public works, asset management, and overseeing special projects such as road reconstruction, utility improvements, facility improvements and construction of new assets. Prior to his employment with the City, he has successfully procured and managed over \$5 million in grants over the past five years, and has demonstrated experience with project management, grant writing, technical writing, energy efficiency, energy conservation and renewable energy. Mr. Matt Smith, the City's Treasurer will assist Mr. LaBombard with the financial management of the grant.

V. Work to be Performed

The schedule presented in the task tables below assumes that the cooperative agreement with U.S. EPA will be executed in the Fall of 2022. After the execution of the cooperative agreement, the City will issue an RFP to identify and procure the services of a qualified environmental consultant. It is anticipated that the City will engage in a professional service contract with the selected consultant by the end of 2022.

Task 1: Community Involvement and Outreach

Implementation activities include the development of a Community Involvement Plan which outlines community participation activities, resident notification of cleanup schedules and progress, and a minimum of three public meetings (pre, interim, and post) to solicit input, educate, and update the community of cleanup progress. This task also includes the attendance of one staff member at the next EPA National Brownfield Conference 2024.

Deliverables: Community Involvement Plan, meeting minutes documenting each Community outreach/involvement/meetings, copies of handout materials, or other materials developed.

Task 2: Cleanup Planning

Implementation activities includes the finalization of the Analysis of Brownfield Cleanup Alternatives (ABCA), development and approval of a risk based TSCA PCB Cleanup work plan/model, preparation of bids and specifications, and solicitation of competitive pricing.

The TSCA PCB Cleanup work plan/model will include updated cleanup volume calculations that incorporates the additional site assessment data from the EPA TBA investigation that is currently in progress. It is anticipated that the approval process of the risk based TSCA PCB Cleanup work plan will take approximately one year and require the submittal of several drafts and ongoing correspondence with EPA TSCA staff before final approval is issued. The attendance of a pre-bid meeting and site walkover will be mandatory for qualified contractors to submit competitive pricing. The retaining of a qualified contractor will abide by EPA Guidelines and the City's established procurement process.

Deliverables: Final ABCA, Risk Based TSCA PCB Cleanup Work Plan, Bid Package/Solicitation, Prebid Meeting/Site Walkover Attendance List, and Bid Tabulation and recommendation to award.

Task 3: Cleanup Activities

Activities include the implementation the risk based TSCA PCB Cleanup work plan that involves the removal and disposal of contaminated soil and concrete surface material at an approved disposal facility, the import and placement of clean fill material, environmental sampling and oversight, and the installation and maintenance of appropriate surface cover. Cleanup of the PCB contaminated areas will be compliant with the cleanup standards outlined in TSCA Subpart D. Environmental sampling will be conducted by the consultant under an approved Quality Assurance Project Plan (QAPP).

Deliverables: QAPP, daily observation reports, project photos, volume of contaminated materials removed. A summary of cleanup activities will also be provided in the quarterly progress reports.

Task 4: Grant Management

Activities includes the preparation and submittal of required progress reports, input of project data into ACRES, preparation and submittal of a final project report, and ongoing correspondence with EPA and EGLE as appropriate. The quarterly reports will describe progress on each defined task in this Work Plan. The Annual Financial Report and the Annual Disadvantaged Business Enterprise (DBE) Report will be prepared in October of each year.

Deliverables: Quarterly progress reports (11), ACRES entries, final project report.

Project Timeline

	2022												2023												2024												2025												
	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D				
Notice of Award (5/12/22)		12th																																															
EPA Brownfield Conference (est. Summer 2024)																																																	
Preparation/Submittal of Work plan																																																	
EPA Cooperative Agreement						30th (est.)																																											
City Procurment of Qualified Consultant									31st (est.)																																								
Task 1 - Community Involvement and Outreach																																																	
Community Meeting 1 (project start)																																																	
Community Meeting 2 (pre-cleanup activities)																																																	
Community Meeting 3 (post-cleanup activities)																																																	
Task 2 - Cleanup Planning																																																	
Revise and Complete ABCA																																																	
Prepare, Submit TSCA Plan																																																	
Bid Specifications, Contractor Selection																																																	
Task 3 - Cleanup Activities																																																	
Cleanup/Implementation of TSCA Cleanup Plan																																																	
Task 4 - Grant Management																																																	
Quarterly Reporting																																																	
Final Project Report																																																	

VI. Remediation Goals for the Project

Cleanup of PCB contamination to the Risk-Based High-Occupancy TSCA standard will eliminate a significant cleanup cost, which would enable state brownfield tax increment financing feasible to implement the necessary due care response activities available for redeveloping property. Neither program would provide enough funding to fully address the cleanup of the PCB contamination and address due care response activities on their own. Surface barriers, vapor intrusion controls, or institutional controls are anticipated to address non-PCB related contamination which can be funded using state brownfield tax increment financing or state brownfield grants and loans.

Preliminary estimates include the removal and disposal of approximately 1,670 tons of contaminated soil, 460 tons of contaminated concrete, the import and placement of approximately 1,000 cubic yards of clean fill material, and the installation and maintenance of an appropriate surface cover consisting of a 10” compacted clay cap over an estimated 8,275 square foot area. Contaminated materials will be transported to a licensed facility capable of meeting applicable disposal requirements.

VII. Project Budget

Budget Categories		Project Tasks (\$642,000)				
		Task 1 Community Involvement	Task 2 Cleanup Planning	Task 3 Cleanup Activities	Task 4 Grant Management	Total
Direct Costs	Personnel	\$0	\$0	\$0	\$0	\$0
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$0	\$0	\$0	\$0	\$0
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$0	\$25,000	\$475,000	\$0	\$500,000
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$0	\$25,000	\$475,000	\$0	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Federal Funding		\$0	\$25,000	\$475,000	\$0	\$500,000
Cost Share		\$11,500	\$0	\$120,500	\$10,000	\$142,000
Total Budget		\$11,500	\$25,000	\$595,500	\$10,000	\$642,000*

**The City is aware that the Total Budget will require a financial commitment that exceeds the 20% match requirement required by the grant guidelines.*

Task 1: Community Involvement and Outreach

Contractual Costs: The cost of preparing presentations for three meetings, which includes the preparation of handout materials and flyers and consultant time to assist the community outreach, and travel to the 2024 EPA Brownfield Conference. This cost of this task is estimated to be \$11,500 which will be paid for with a combination of grant funds and the City’s match.

- \$7,500 (City match) is budgeted for meetings at \$2,500/meeting, 20 hrs./meeting at an average rate of \$125/hr.
- \$4,000 (EPA Funds) is budgeted for attendance to the 2024 EPA Brownfield Training Conference. This includes registration fees (\$350), a day per-diem (\$2,600 over four days), lodging (\$350 over 3 nights) and air travel (\$700).

Task 2: Cleanup Planning

Contractual Costs: The total estimated cost to complete cleanup planning activities, which includes finalizing the ABCA, preparing the Risk Based TSCA PCB Cleanup Work Plan, and scoping and bidding the project is \$25,000.

- The cost of preparing and submitting a TSCA PCB Cleanup Work Plan for EPA TSCA approval is estimated to require 150 hours, at an average rate of \$125/hr. for an estimated cost of \$18,750.
- The cost of finalizing the ABCA is estimated to require 10 hours, at an average rate of \$125/hr. for an estimated cost of \$1,250.
- The cost of scoping, bidding, and selecting a qualified contractor to complete the cleanup activities is estimated to require 40 hours, at an average rate of \$125/hr. for an estimated cost of \$5,000.

Task 3: Cleanup Activities

Contractual Costs: The total estimated cost of cleanup activities (to be overseen by the environmental consultant) is \$595,500, which will be paid for with a combination of grant funds and the City's match.

- The cost of excavation, transportation and disposal of PCB contaminated concrete and soil is estimated to be \$532,500 based on a unit cost of \$250/ton and a preliminary estimate of 1,670 tons of soil, and 460 tons of concrete.
- The import and placement of clean fill is estimated to be \$20,000 based on a cost of \$20/cubic yard and a preliminary estimate of 1,000 cubic yards.
- The installation and maintenance of appropriate surface cover consisting of a 10" compacted clay cap is estimated to be \$3,000 based on a unit cost of \$10.00/cubic yard and a preliminary estimate of 300 cubic yards.

Task 4: Grant Management

This task will be paid as part of the City's match and is estimated to be \$10,000 (80 hours at \$125/hr.).