



COMMUNITY INVOLVEMENT/RELATIONS PLAN

Indiana Brownfields Program / Revolving Loan Fund IFA Cooperative Agreement with U.S. EPA (RLF #4B-00E3232-0)

**Former Exide Battery Factory
303 Water Street
Logansport, Indiana
May 2024**

OVERVIEW

The Indiana Finance Authority (IFA), through the Indiana Brownfields Program (Program), in cooperation with the City of Logansport (City) has prepared this Community Involvement/Relations Plan (CRP) for the City's pending RLF Loan for the cleanup of the Former Exide Battery Factory located at 303 Water Street in Logansport, Indiana (Site). The City has applied to the Program for a total of \$2.9 million for the Site which will be funded by RLF funds and will facilitate Site reuse for municipal and commercial / light industrial purposes. This Community Relations Plan (CRP) was prepared by BCA Environmental Consultants, LLC (BCA) on behalf of the City of Logansport (City). The CRP has been prepared in accordance with the Indiana Brownfield Program's (IBP's) RLF Incentive Guidelines to help satisfy the public notice requirements of the Indiana Finance Authority's (IFA's) cooperative agreement (RLF #4B-00E03232-0) with the U.S. Environmental Protection Agency (U.S. EPA).

The community utilizing 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;
- Opportunity for involvement and allowance of adequate public comment period;
- 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 did/will address communication of information to and involvement of the citizens of Logansport, Indiana, particularly the residents directly or potentially affected by proposed environmental response actions on the Site. The CRP outlines how Logansport has involved, should involve, and will continue to involve affected residents, City officials, and local organizations in the decision-making process regarding the environmental remediation efforts at the Site proposed for remediation and redevelopment.

The City 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 City is primarily responsible for community notification and involvement during the redevelopment project regarding response actions and loan funding for Site activities. Logansport 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 \$3.9 million in RLF 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 Information Repository for this federally funded Site is Mr. Ross Anderson, who may be contacted as noted below:

Mr. Ross Anderson
Grant Administrator
601 E. Broadway Street, Suite 203
Logansport, Indiana 46947
Phone number: (574) 753-4745
Email: randerson@cityoflogansport.org

INFORMATION REPOSITORY LOCATIONS

The main Information Repository, which contains the Administrative Record for site response actions, is located at the City of Logansport's Clerk Treasurers Office open Monday through Friday, between 8:00 am and 4:00 pm at the below address. To accommodate viewing after 4:00 pm, the Logansport-Cass County Public Library will serve as a backup viewing location. The Administrative Record can be accessed by personal request at the public counter of either location.

Clerk Treasurer's Office – City Hall Building
601 E. Broadway Street, Suite 203
Logansport, IN 46947

Logansport-Cass County Public Library
616 E. Broadway Street
Logansport, IN 46947

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: <https://ecm.idem.in.gov/> by entering 4221108 (Brownfields Site #) or 0000971 (State Cleanup Site #) in the search bar.

SITE LOCATION

Former Exide Corporation

Indiana Brownfields Program Site #: **4221108**
IDEM State Cleanup Site #: **0000971**
Street Address: **303 Water Street**
City: **Logansport, Indiana** Zip: **46947** County: **Cass**
Tax Parcel Identification #: **09-17-56-100-001.000-010**

SITE BACKGROUND

The Former Exide Corporation site is located at 303 Water Street, in Logansport, Indiana and is composed of a 17.41-acre parcel identified as: #09-17-56-100-001.000-010. The Subject Site is owned by the City of Logansport and is currently a vacant lot. The surrounding area is mixed use industrial and residential properties. The foundation and slab remaining from the former Exide manufacturing facility covers most of the northern half of the Site. The Site is located on the south side of Water Street, between Aster Street and residential properties to the west and commercial properties to the east. The former Logansport & Eel

River Short Line railroad (abandoned) adjoins along the south side of the Site with the former Trelleborg Automotive property beyond. Residential and commercial properties are located to the north across Water Street.

The Subject Site operated as a rail yard and was part of the Terre Haute & Indianapolis Railroad – Vandalia Line from at least 1885 – 1930s. Former railroad operations associated with the Subject Site included rail sidings and maintenance facilities (roundhouse). The Site operated as the National Steel Construction Company – Logansport Plant, manufacturers of steel products from at least 1949 to the late 1950's. General Tire reportedly operated the plant until it was purchased by Exide in 1959. Exide operated the Site as a lead-acid storage battery manufacturing facility for the automotive industry from about 1960 to approximately 1989, before fully shutting down in 2009. The former building was demolished in 2016 and has since been vacant.

Documents found in the IDEM VFC indicate that this facility had releases of lead dust and sulfuric acid. A 1982 EPA Inspection report indicates that on-site soils had “extremely high levels of lead”, and Exide was ordered by the EPA to remediate the contaminated soil. A Remedial Action Proposal was prepared in January 1984 and submitted to the EPA on Exide's behalf. The areas targeted for remedial activities were located on the south side of the facility and at least 2800 tons of soil was removed and disposed at a landfill.

A study done by IDEM in 2014 to determine the extent of lead impacted soils around the perimeter of the property and in the northern adjoining residential neighborhood. The study found impacted soils at multiple sample points around the southern, eastern, and northern perimeter of the Subject Site, as well as elevated lead concentrations in the surface soils down-wind of the Site.

During Phase II and Supplemental Phase II ESAs, Trichloroethene (TCE) impacts were found in the soil and groundwater on the eastern portion of the property. A soil gas survey indicated elevated soil gas concentrations of TCE in the same area. The investigations also revealed that lead was still present in the surface and shallow subsurface soils, in many places exceeding the IDEM Human Health Levels for excavation direct contact on-site and along the northeastern edge of the public right-of-way.

REDEVELOPMENT PLANS

The planned reuse for the Site is for municipal and commercial/light industrial purposes. About half of the Subject Site will be converted into a new facility for the City of Logansport Streets Department, while the other half will be sold or leased as commercial / light industrial land.

NATURE OF THREAT TO PUBLIC HEALTH AND ENVIRONMENT

Based on the findings of Phase II and Supplemental Phase II ESAs, the soil and groundwater of the former industrial Site has been shown to contain hazardous substances (lead and TCE) exceeding regulatory screening levels. Human health impacts to site occupants, construction workers and potential groundwater users 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.

There is a significant risk of direct contact exposure to contaminated soils due to the presence of lead in the shallow soils (surface to 18 inches bgs) which exceeds IDEM's EDC PL at several locations. Direct contact with TCE contaminated soils are less likely as TCE hotspots are generally 2-3 feet bgs. The direct exposure pathway will be reduced or eliminated by the removal of TCE hotspots, along with treatment and removal of all lead contaminated soils exceeding the EDC.

There is a potential for dermal exposure for construction workers at the Site from subsurface soils. Migration to groundwater exposure will be reduced by removing soil hotspots and/or treatment of contaminated soil designed to greatly reduce potential for leaching to groundwater.

Other than those present for environmental monitoring, no water wells are present on the Site, and the Site and all surrounding neighborhoods are supplied by City Water. While TCE is present above regulatory screening levels in the on-site groundwater, environmental investigations had indicated that this contamination does not extend to the property boundaries and no offsite neighbors are affected. An environmental restrictive covenant (ERC) will be attached to the property deed for the Site prohibiting groundwater usage for anything other than environmental sampling.

There is a potential for inhalation exposure to migrating VOC vapor for building occupants over the TCE impacted soil and groundwater plume on the eastern side of the property, however, there are no buildings within this area. An ERC will be attached to the property deed requiring some form of vapor mitigation for any newly constructed, occupied buildings near the soil TCE hotspots or groundwater plume.

The planned redevelopment of this Site will be for Municipal and commercial / light industrial purposes. The most applicable cleanup standards are Industrial/Commercial Direct Contact Published Levels for Soil Exposure, as outlined in Table A-1, Human Health Levels 2023, of IDEM's Risk-Based Closure Guide.

COMMUNITY BACKGROUND

The Site is located in a mixed residential, commercial, and industrial area on the northwest side of Logansport. The community is poised for redevelopment opportunities, including this industrial/commercial redevelopment project, to help stimulate its local economy. In addition to providing light industrial / commercial employment opportunities to the City, the redevelopment will also allow the City's Streets department garages to be moved from their current location on Race Street, directly adjacent to riverfront property along the Eel River. This riverfront property will be redeveloped to include commercial businesses and multi-residential housing.

The City needs RLF funding from the IFA to facilitate the remediation and reuse of this former industrial Site. With this loan funding, the Site will be usable for its intended redevelopment for municipal and commercial / light industrial purposes.

Local leaders involved with these redevelopment efforts include the Mayor's Office, Logansport Storm Water District, the City Council members, and the City Parks Department, among others.

CHRONOLOGY OF COMMUNITY INVOLVEMENT

Discussions for redevelopment and planned reuse of this site have occurred during several City Council meetings (open to the public) and during a joint EPA/City hosted Town Hall event regarding cleanup of the nearby residential neighborhood. The overall response has been positive due to the anticipated economic impact and the reduction of blight in the community.

Community involvement has been an ongoing element of the City's redevelopment efforts and will continue to be a priority. Prior to applying to the IFA for loan funding for Site remediation, the City has involved its community members in part because of other state and federal funding it has sought/received. The City has/will inform the public through flyers, news articles, meetings and published meeting notes. The City 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 City prepared a legal ad for the RWP to run throughout the month of June 2024. Subsequent City legal ads will reference the ABCA and the SHPO response, as well as this CRP, in the designated local public repositories for review. The City plans to compile/address any comments prior the start of remediation activities.

CONTINUED COMMUNITY INVOLVEMENT

The City is committed to maintaining community involvement for the Site cleanup and redevelopment process. The City has and will dedicate necessary staff time to complete such administrative requirements. The City 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.

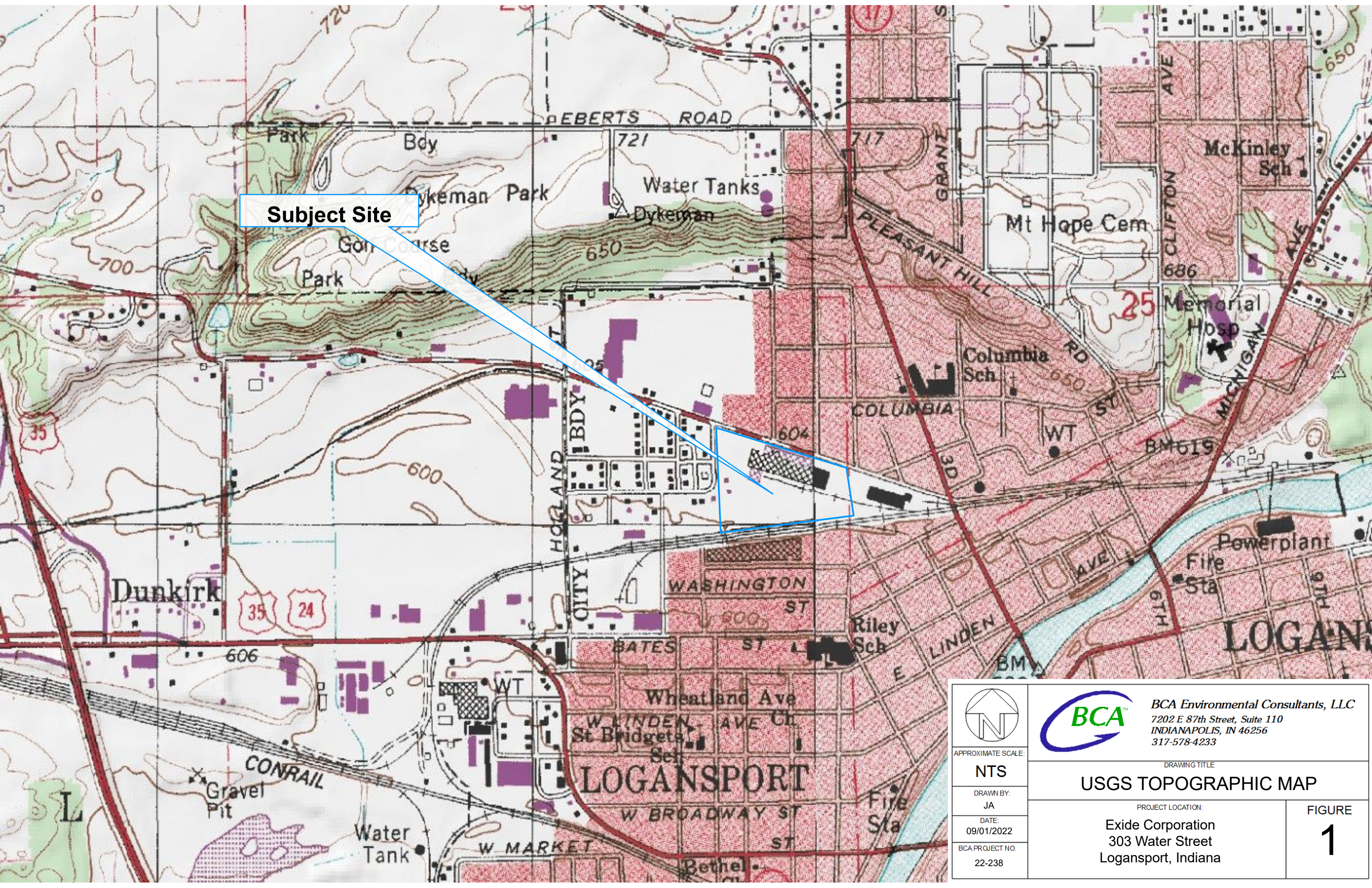
Key local officials and community members will be updated on a regular basis at the public meetings. Opportunities for continued public participation in decisions concerning environmental response actions at the Site and the City's intentions for loan funding will be provided primarily through public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

In conformance with U.S. EPA guidelines 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 City will utilize its web site <http://www.cityoflogansport.org/> and published notices in the local newspaper to inform the community about agendas, meeting minutes, requests for proposals, etc. While the City does not anticipate issuing any newsletters, following is a list of the types of public notices, hearings, and sessions to be published:

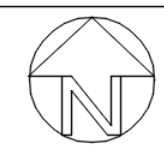
- notice announcing document information repository and response actions;
- notice announcing the availability of the Administrative Record including the CRP, the RWP, the ABCA, and other relevant Site documents for a 30-day comment period;

- 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 repository will be maintained and updated throughout the environmental response action phase of Site redevelopment.



Subject Site



APPROXIMATE SCALE:

NTS

DRAWN BY:

JA

DATE:

09/01/2022

BCA PROJECT NO.

22-238



BCA Environmental Consultants, LLC
 7202 E 87th Street, Suite 110
 INDIANAPOLIS, IN 46256
 317-578-4233

DRAWING TITLE

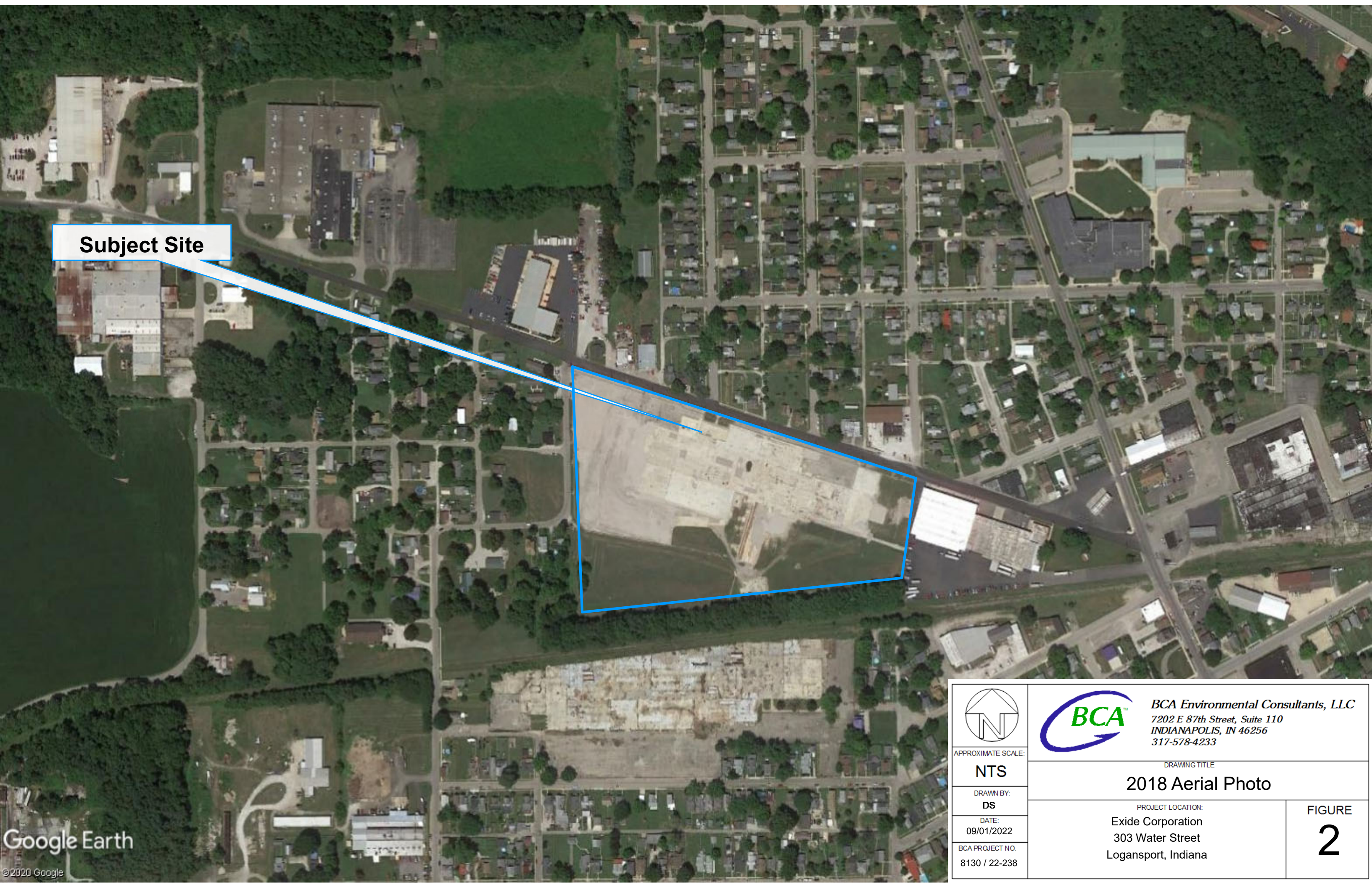
USGS TOPOGRAPHIC MAP

PROJECT LOCATION:

Exide Corporation
 303 Water Street
 Logansport, Indiana

FIGURE

1



Subject Site

	 BCA Environmental Consultants, LLC 7202 E 87th Street, Suite 110 INDIANAPOLIS, IN 46256 317-578-4233	
	APPROXIMATE SCALE: NTS	DRAWING TITLE 2018 Aerial Photo
DRAWN BY: DS	PROJECT LOCATION: Exide Corporation 303 Water Street Logansport, Indiana	FIGURE 2
DATE: 09/01/2022		
BCA PROJECT NO. 8130 / 22-238		