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-00E14606-0
Former Shell Bulk Oil Terminal Facility
2121 and 2219 West Michigan Street
Indianapolis, Marion County, Indiana
Brownfield Site ID: 4980013
July 2013

OVERVIEW

The Indiana Finance Authority (IFA), through the Indiana Brownfields Program (Program), in cooperation with the Westside Community Development Corporation of Indianapolis (WCDC) and Heartland Environmental Associates, Inc. (Heartland), has prepared this Community Involvement/Relations Plan (CRP) for 128(a) funding for the cleanup of the former Shell Bulk Oil Terminal facility located at 2121 and 2219 West Michigan Street in Indianapolis, Marion County, Indiana (Site). The WCDC applied to the Program for assessment and cleanup funding for the Site which will facilitate Site reuse for commercial purposes. The CRP is in accordance with the Program and U.S. Environmental Protection Agency (U.S. EPA) guidelines to help satisfy the public involvement 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;

- 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 Indianapolis, Indiana, particularly the residents directly or potentially affected by proposed environmental response actions on the Site. The CRP outlines how the WCDC has involved, should involve, and will continue to involve affected residents, City and WCDC representatives, and local organizations in the decision-making process regarding the environmental remediation efforts at the Site proposed for remediation and redevelopment.

The WCDC 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 WCDC is primarily responsible for community notification and involvement during the redevelopment project regarding response actions and federal funding for Site activities. The WCDC 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 up to approximately $150,000 in 128(a) federal funding from the IFA. The Program will use federal funds to oversee an environmental consulting firm (Heartland) to remediate environmental impacts at the Site by solidifying contaminated soil, which will help remediate groundwater impacts and mitigate potential future exposure pathways.

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 the Information Repository for this federally funded Site is Mr. Phil Votaw, who may be contacted as noted below:
INFORMATION REPOSITORY LOCATIONS

The main Information Repository, which contains the Administrative Record for Site response actions, is:

Indianapolis-Marion County Public Library (IMCPL)

One Library Square

40 East St. Clair Street

Indianapolis, Indiana 46204

**Hours:**
- Mon - Thu 9:00 AM - 9:00 PM
- Fri 9:00 AM - 6:00 PM
- Sat 9:00 AM - 5:00 PM
- Sun 1:00 PM - 5:00 PM

The Administrative Record can be accessed by personal request at the public counter of IMCPL.

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](http://12.186.81.89/Pages/Member/EnhancedSearch.aspx), searching by Brownfields Site # 4980013, or the address of the Site.

SITE LOCATION

**Former Shell Bulk Oil Terminal Facility**

Indiana Brownfields Program Site #: 4980013

Street Address: **2121 and 2219 West Michigan Street**

City: **Indianapolis, Indiana** Zip: 46222 County: **Marion**

Tax Parcel Identification #: **9021170 & 9054011**
SITE BACKGROUND

The Site, which is located on approximately 4.70 acres situated on two parcels, operated as a bulk oil storage warehouse and dispensing facility. The Site historically dispensed, sold and stored petroleum products. Petroleum storage activities occurred from at least 1937 through 1996, when the Site was demolished. Site demolition activities included the razing of all Site buildings and superstructures, the removal of all foundations and footers, and the backfilling of the Site to grade. The Site has remained vacant since this time and is currently undeveloped and covered by landscaped areas and overgrowth vegetation. The Site was obtained by the City of Indianapolis in 1996, and transferred to the WCDC in 1999. The WCDC is a not-for-profit, Community Development Corporation, serving the Haughville, Hawthorne, Stringtown & We Care neighborhoods on the near west side of Indianapolis, Indiana. Figures depicting the Site are included as Attachment A of this CRP.

REDEVELOPMENT PLANS

In late 2012, the City of Indianapolis and the WCDC began evaluating the Site for purposes of redevelopment. As part of this redevelopment evaluation, it was determined that additional investigation was needed throughout the Site to determine the long-term effectiveness of the prior remedial efforts and to assess existing subsurface conditions at the Site. The WCDC currently owns the Site and intends to remediate and redevelop it for commercial purposes to revitalize it and the surrounding area.

NATURE OF THREAT TO PUBLIC HEALTH AND ENVIRONMENT

Beginning in 1995, the Site was subject to numerous subsurface investigations and remediation indicating the Site had petroleum impacts that posed a threat to groundwater. In 1999, a limited human-health risk evaluation for groundwater was completed, and it was determined that existing groundwater impacts did not pose a threat to human health or the environment at the time, especially if the Site was not used for residential purposes. However, in 2012, upon further evaluation for redevelopment purposes, it was determined that impacts present at the Site, although encountered at depth, present a potential concern regarding groundwater usage and potential vapor intrusion in any new construction within the area of concern from Volatile Organic Compounds (VOCs) in the groundwater. Therefore, remediation of groundwater impacts is recommended prior to redevelopment to mitigate potential future vapor intrusion issues and any potential additional exposure pathways that might pose a threat to public health and the environment. The Site does not pose an imminent threat to human health or the environment.
The Site is enrolled in the Program, which will continue to provide oversight of remediation activities. Remedial actions will be focused primarily on soil that will help mitigate groundwater impacts.

Since the future redevelopment plans indicate that the Site will be developed for commercial purposes, the most applicable cleanup standards are Industrial/Commercial as outlined in IDEM’s *Remediation Closure Guide* dated March 22, 2012.

**COMMUNITY BACKGROUND**

Local leaders involved with these Site redevelopment efforts include the City of Indianapolis and the WCDC. The west side Indianapolis community is poised for redevelopment opportunities, including this commercial redevelopment project, to help stimulate its local economy.

The WCDC needs this 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 redevelopment purposes.

**CHRONOLOGY OF COMMUNITY INVOLVEMENT**

Since 1999, when the WCDC has owned the Site, this non-profit group has been working toward addressing environmental issues for redevelopment in the neighborhood. The WCDC’s mission is to stabilize and revitalize the near west side of the City of Indianapolis via housing and commercial development, property management, and community planning.

The WCDC can inform the public through flyers, news articles, local meetings and/or published meeting notes. To comply with U.S. EPA’s public notice/comment period prior to the anticipated summer field work activities at the Site, the WCDC has published a legal ad/public notice in *The Indianapolis Star* newspaper to run from June to July 2013 regarding Site cleanup documents. The legal ad references the RWP, ABCA and the SHPO responses, in the designated local public repository for review. The WCDC plans to compile/address any comments prior to 128(a)-funded remediation activities. The WCDC also utilized its Web site to post a public notice about the Site at http://wcdcindy.org/?page_id=203.

**CONTINUED COMMUNITY INVOLVEMENT**

The WCDC is committed to maintaining community involvement in Indianapolis for the duration of the Site cleanup and redevelopment process. It can utilize its Web site to inform the community about agendas, meeting minutes, requests for proposals, etc.
The WCDC has and will dedicate necessary staff time to complete such administrative requirements. The WCDC 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 as necessary 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 WCDC’s intentions for 128(a) federal funding will be provided primarily through public notices and meetings. The WCDC will engage all informational activities in the community.

In conformance with U.S. EPA guidelines and 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. While the WCDC does not anticipate issuing any newsletters, following is a list of the types of public notices, hearings, and/or sessions that may be published:

- notice announcing document information repository and response actions;
- notice announcing the availability of the Administrative Record including the RWP, the ABCA, and other relevant Site documents for a public 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 Program Web site will also link to the Site cleanup documents for public view. The document information repositories will be maintained and updated throughout the environmental response action phase of Site redevelopment.