

Community Relations Plan

U.S. Environmental Protection Agency – Brownfields Cleanup Grants for Former Howes Leather Site Curwensville, PA.

Overview.

The purpose of the Community Relations Plan (CRP) is to describe the Clearfield County Economic Development Corporation's strategy to address the concerns of residents potentially affected by activities conducted at the former Howes Leather Site ("Site"). The CRP also outlines how citizens have been involved throughout the planning process for this cleanup and redevelopment project ("Project").

Spokesperson and Administrative Record.

The spokesperson for this Project is Rob Swales, who may be contacted at:
Clearfield County Economic Development Corporation ("CCEDC")
511 Spruce St.
Clearfield, PA. 16830
814-768-7838
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The Administrative Record is located at the CCEDC's office at the above address. During the 30-day comment period, a set of documents will also be available at the:

Curwensville Borough
900 Susquehanna Ave.
Curwensville, PA. 16833
814-236-1840

A copy will also be available at the local library located at:
Joseph & Elizabeth Shaw Public Library
1 S. Front St.
Clearfield, PA. 16830

A copy will also be available at the CCEDC website - www.clearlyahead.com

Site Description. – *Former Howes Leather Site, Curwensville, PA.*

The Site is 26.5+/- acres located off 50 Cooper Road in Curwensville, PA., and consists of 5 total parcels. The site was acquired on March 11, 2014 by the CCEDC from HL Tannery Co.

Site History.

The Site had been used as a tannery/leather treatment facility from at least 1900 through 2004. In August 1993, Underground Storage Tank (USTs) activities were performed on four USTs at the Site: (1) 500 gallon gasoline UST; (1) 500 gallon Varsol UST; (1) 295 gallon kerosene UST and (1) 295 gallon gasoline UST. The USTs were closed by removal with hydrocarbon odors and stained soils noted in soils surrounding the Varsol UST. Approximately 10 tons of material

beneath the Varsol UST were considered impacted and were excavated. The Tank Closure Report concluded that the soils beneath the Varsol tank were adversely impacted by petroleum products. In 1994 following additional assessment in this tank area, Mountain Research, Inc. recommended that additional soils be excavated. There is no evidence in PADEP files or elsewhere that the additional soil excavation occurred. A test pit investigation in 2005 noted gasoline type odors in the pit and VOCs were identified in soil samples.

As part of the 1993 UST closure activities, approximately 10 tons of material was also removed from each of the other UST excavations. It is not known where the removed material was disposed. In addition, the analytical parameters for confirmation soil sampling did not include all of the current short list constituents required by pertinent PADEP regulations (Title 25PA Code Chapter 245, Administration of the Storage Tank and Spill Prevention Program regulations}. There was also reportedly a release from a UST in a “truck traffic and truck parking” area which was successfully remediated in 1995. Records indicate the release contained diesel-range organics.

In 2014, the building foundations were removed from the site, and with PADEP approval, placed in the former Howes Leather sludge lagoon located on the eastern portion of the Site. The former sludge lagoon has been closed and is currently in the final phases of confirmatory groundwater sampling.

Cleanup of transformer oil spills was completed in 2014 following the vandalism and theft of scrap metal from non-polychlorinated biphenyl (PCB) certified transformers remaining at the Site. A total of six spill areas were excavated, disposed, and confirmatory samples collected which confirmed pertinent PADEP remediation standards were met. The spill response and remedial activities resulted in the excavation and disposal of approximately 21 tons of soil and transformer insulating materials/debris, approximately 140 gallons of transformer oil/water mixture, and the removal and recycling of all the transformers. Tanning vat sludge was encountered during the removal of concrete flooring and footers at the facility in October 2014. The sludge was found to be contained within multiple wooden vats across a continuous area of approximately 1,500 sq-ft. Characterization and excavation of the sludge was completed, resulting in the excavation and disposal of approximately 960 tons of soil/sludge and associated debris. All post-excavation soil sample analytical results were reported below applicable PADEP remediation standards.

As indicated above, site characterization work was done as part of UST closure activities conducted at the Site in the mid-1990s. The following summarizes results of the more recent environmental assessments performed at the Site. Malcolm Pirnie, an environmental consulting firm, conducted Phase I and Phase II ESAs at the Site in 2005 on behalf of a potential buyer. The Phase II involved collecting 23 soil samples from the following locations: 10 test pits, 12 soil borings and surface soil locations. Elevated levels of arsenic were identified in soils and groundwater in the north central portion of the Site. Certain VOCs (including toluene) were present in groundwater in the northeastern portion of the site downgradient of the Former Wastewater Treatment Area.

In 2012, DMS Environmental Services, LLC (DMS) conducted a Phase I ESA at the Site which incorporated review of previous ESA activities. The Phase I identified the following Recognized Environmental Conditions (RECs):

- The Former Varsol Tank Area for potential VOC impacts to soil and groundwater due to evidence of the release in the Closure Report and inadequate characterization of impacted soils.
- The former two gasoline and one kerosene UST areas for potential VOC impacts to soil and groundwater due to evidence of the release in the Closure Report and inadequate characterization of impacted soils. In addition, a groundwater characterization in 1995 detected diesel range organic compounds in groundwater following the closure activities.
- The Former Floor Drain System due to the likelihood of residual process water and sediments trapped in the piping.
- The current stormwater collection system outfall location due to the likelihood of historic industrial discharges potentially impacting river sediments.
- The presence of arsenic in soil and groundwater downgradient of the former Beam House (north central Site area) based on historic soil and groundwater sampling.
- The presence of VOCs in groundwater downgradient of the Former Wastewater Treatment Plant (northeastern Site area) based on historic groundwater sampling.
- An Independent Electric Plant identified in a 1943 Sanborn Map due to potential for PCB contamination.
- The historic presence of large coal pile and layers of coal ash for potential impacts to soil and groundwater from certain heavy metals and sulfate.

In 2013 DMS implemented a Phase II ESA to evaluate the above-referenced RECs. The following summarizes findings of the Phase II ESA which included collecting soil, groundwater and surface water and sediment samples with analysis for constituents of concern.

- Confirmation that a release occurred at the former location of the 500-gallon unleaded gasoline UST and saturated subsurface soils exhibited concentrations of several unleaded gasoline constituents which exceeded their respective Act 2 non-residential standards.
- Sediment sampling at the historic stormwater outfalls confirmed the presence of arsenic above the arsenic residential standard.
- Sediment sampling of the Fire Pond identified several metals exceeding the EPA Region III BTQAG (Biological Technical Assistance Group) pertinent benchmark screening values.
- Soil sampling in the northcentral Site area near the river confirmed the presence of arsenic concentration in soils exceeding the arsenic nonresidential soil to groundwater MSC.
- The Former Varsol Tank area was eliminated as a REC based on the soil sampling results.
- Two additional Areas of Interest (AOI's) were retained due to the investigative results not satisfying data requirements to confirm or eliminate the RECs, specifically the Former 295-gallon Kerosene Above Ground Storage Tank and the sitewide groundwater evaluation for impacts from various potential sources.

Nature of Threat to Public Health and Environment.

In 2013 and 2014 DMS implemented a follow-on Phase II ESA to further investigate two of the four Areas of Interest which required further investigation based upon results of the original DMS Phase II ESA, specifically the Former 500 Gallon Unleaded Gasoline UST and the Site-Wide Groundwater Evaluation. The scope included installing one new groundwater monitoring well downgradient of the Former Unleaded Gasoline UST area and conducting site-wide groundwater monitoring with analysis for priority pollutant metals and VOCs. The following summarizes the findings:

- 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were detected at concentrations above the PADEP nonresidential used aquifer MSCs in the new groundwater monitoring well downgradient of the Former Unleaded Gasoline UST.
- The site-wide groundwater monitoring found that dissolved arsenic and dissolved thallium were widespread in site groundwater at concentrations exceeding their respective PADEP nonresidential used aquifer MSCs.

In 2019, Tetra Tech, Inc. (Tetra Tech) implemented on behalf of CCEDC a Phase II ESA at the Site under the FY2018 EPA Brownfields Assessment Grant awarded to CCEDC. The purpose of the Phase II ESA was to further delineate previously identified contaminated areas that were not subsequently remediated. The Tetra Tech Phase II ESA included conducting the following activities: soil sampling (via 45 borings and test pits), historic outfall sediment sampling, installing four additional monitoring wells, groundwater sampling of the entire 19 well network, Fire Pond surface water sampling, and analysis of all collected samples for strategically selected parameters based on historic operations / identified releases. To help delineate areas requiring remediation, analytical results were compared to PADEP Act 2 non-residential standards as well as criteria for evaluating potential for vapor intrusion. Fire Pond sediment results referenced above were evaluated according to new PADEP guidance for ecological evaluation for sediments.

As a result of the Phase II ESA, the following areas having constituent concentrations above the Act 2 SHS were identified:

Soil:

- Arsenic exceedances in the vicinity of the “High Arsenic Concentration Area” in the northern portion of the Site along the West Branch of the Susquehanna River.
- Lead exceedance in the western area of the Site identified as part of a general site wide sampling location at one soil boring.
- 1,2,4-Trimethylbenzene exceedances within the Former Unleaded Gasoline UST Area.

Groundwater:

- Arsenic exceedances within the “High Arsenic Concentration Area” in one monitoring well.
- Benzene and 1,2,4-trimethylbenzene exceedances in Former Unleaded Gasoline UST Area in one monitoring well.
- 1,2,4-Trimethylbenzene exceedance above the PADEP Default Nonresidential Vapor Intrusion Screening Criteria was identified for the sample collected from the monitoring well in the central portion of the Former Unleaded Gasoline UST area.

In summary, the following soil areas were identified for Cleanup as a result of the historic and Tetra Tech 2019 environmental assessment:

Soil:

- High Arsenic Concentration Area in the north-central portion of the site along the West Branch of the Susquehanna River
- Elevated Lead Area in the western site area, and
- 1,2,4-Trimethylbenzene impacted soil in the vicinity of the Former Unleaded UST.

Groundwater:

- Benzene and 1,2,4-trimethylbenzene contaminated groundwater in the vicinity of the Former Unleaded UST Area.

In follow-up to the above findings, a supplemental “Pre-Design” Phase II ESA was implemented by Tetra Tech in December 2020 and January 2021 to further delineate the above areas targeted for remediation and facilitate revision of the ABCA and development of a Cleanup Plan for the site. The following summarizes the scope of work of this assessment:

- Twelve borings in the High Arsenic Area to further delineate extent of arsenic exceedances.
- Eight borings to further delineate extent of lead exceedance found in the western area of the Site.
- Three monitoring wells installed downgradient of the Unleaded UST Area to delineate the Volatile Organic Compound (VOC) contamination in this area.

Tetra Tech will evaluate the field and laboratory analytical results from the above activities relative to PADEP standards to refine the delineation of the vertical and lateral extent of contaminated areas and to facilitate evaluating Cleanup alternatives including estimating Cleanup costs. The results of the evaluation will be integrated into the ABCA.

Community Profile.

Populated by small towns and rural communities, Clearfield County lies in the center of Pennsylvania, 30 miles west of Penn State University. Clearfield County covers more than 735,000 picturesque acres or 1,150 square miles, and is home to 81,642 people, 30 townships, 20 boroughs and one city. Clearfield Borough is the County seat. Interstate 80 is just minutes away, and Clearfield County is an ideal location for targeting major markets in the Eastern United States, the Midwest, and Canada. It is also adjacent to Centre County, home of Penn State University.

While rural, Clearfield County has rich industrial history. The availability of coal, lumber, railroads, and access to major markets, led to the location of brick works, tanneries, wood processors, coal mines, and small manufacturers. The subject Site was in fact a tannery that operated for approximately 100 years at this location. This Site is in the small town of Curwensville, approximately 7 miles south of Clearfield and Interstate 80, and accessible via State Route 879 which runs throughout the valley. Today, Curwensville struggles with higher unemployment and poverty compared to Clearfield County, the State, and Country. However,

the Borough has a strong identity and this Site is one of the largest development sites in the County and is the largest in Curwensville.

Key Community Concerns.

The development of the former Howes Leather site is consistent with Clearfield County's Comprehensive Plan. Among other things, the Comprehensive Plan calls for conservation of green space, use of existing infrastructure, reuse of brownfields, development of walking and biking trails, protection and use of the rivers, and directing public resources into older communities.

Our Reuse Strategy is to capitalize on the advantages of this Site, including:

- Existing infrastructure located at the curb
- Access to Interstate 80 – approximately 7 miles away via State Route 879
- Access to Penn State University, it is 30 miles away in adjacent Centre County

The Site will be marketed locally, nationally, and internationally to industrial manufacturing companies in various industries where our County has competitive advantages. These industries include plastics, hardwoods, powdered metal, oil and gas, and food and beverage. There are already several local companies, including a lumber and truss manufacturer located adjacent to the Site, that have expressed an interest in expanding on the subject Site. In addition to this local interest, CCEDC works with the Pennsylvania Department of Community and Economic Development (“PADCED”) and the Office of International Business Development to attract foreign direct investment to the region. CCEDC has hosted recent business delegations from China, Japan, Australia, United Kingdom, India.

In FY 2008, CCEDC received an EPA Assessment Grant that led to the redevelopment of downtown Clearfield featuring new amenities including an expanded YMCA, a new Riverwalk along the West Branch, and private investment. CCEDC wants to build on that success by providing ready sites available for larger industry, local entrepreneurial ventures, and amenities to attract a younger workforce.

CCEDC anticipates subdividing this flat 26.5-acre Site into smaller 5-acre parcels that can accommodate buildings of approximately 20,000 to 30,000 square feet. We project 100,000 to 120,000 square feet of new construction and a total private investment of \$12 million. Based on our industry experience of one job created for every 500 square feet of industrial development, we project over 240 jobs on this Site. According to the American Community Survey, in 2017 Curwensville had a labor force of 1,237, with 171 unemployed (or 13.8% of the labor force). The redevelopment of the subject Site, together with local workforce development efforts, would have a sizable impact on local unemployment. In fact, Curwensville could not supply workers to satisfy all employment demand generated by redevelopment of the subject Site. The site would also draw employees from nearby Clearfield, which is also a Federally designated Opportunity Zone. In addition to this employment impact, we project real estate tax revenues of approximately \$125,000 annually.

Chronology of Community Involvement.

Community Notification Ad. An ad was placed in The Clearfield Progress on November 19, 2019 that notified the public of a meeting on November 22, 2019 to discuss an application to the U.S. Environmental Protection Agency for a Cleanup Grant. The meeting was held as advertised at 3:00 p.m. at the offices of CCEDC, 511 Spruce St., Clearfield.

The draft proposal and the draft Analysis of Brownfields Cleanup Alternatives (ABCA) were provided for public review and discussed at this community meeting. Members of the local press attended the meeting, and all comments received were in support of the Project and the importance of job creation at that Site.

As part of the Cleanup Grant Proposal submission, CCEDC identified four key stakeholders for continued community involvement. These stakeholders are identified below:

Partner Name	Point of Contact	Specific Role in the Project
Curwensville School District	Ronald Matchock, Superintendent 814-236-1100	Public School sits across Cooper Rd. for subject Site. School District will provide input on cleanup plan and also monitor progress, including providing “teaching moment” for students.
Curwensville Borough	Sarah Curulla, Chair 814-236-1840	Provide input on cleanup and schedule and monitor progress.
Curwensville Regional Dev. Corp.	Eric Johnson, Chair 814-236-2550	Partner in attracting new industry to site and involved in Quarterly Progress Meetings.
PA. Career Link	Terry Vanderburg 814-765-8118	Provide workforce training to prospective employers at the Site.

CCEDC will hold progress meetings in conjunction with the Clearfield County Industrial Development Authority’s regularly scheduled 2021 public meetings on March 25th, May 27th, September 23rd, and November 19th, 2021. These meetings will be held in the CCEDC Conference Room located at 511 Spruce Street, Suite 5, Clearfield, PA. Meeting times for 2022 and 2023 will be determined at the beginning of the respective years. The public will also be invited. In addition, when progress is made on cleanup and/or business recruitment, we will hold public media events and invite local media including GANT News, the Daily Media, The Clearfield Progress, and the Courier Express. From our prior experience, these events work very well and spark additional public interest. It is an effective way to involve the community at large and gain greater acceptance for this and future projects. We also publish an annual report that will provide details on the cleanup and redevelopment of this Site.

Website. www.clearlyahead.org. We will also continue to update our website with progress reports, as well as link our website to our Partner’s websites. Notice of the Quarterly public meetings will be posted on our website along with minutes of that meeting. Interested parties will be invited to submit any questions or comments to Rob Swales at: rswales@clearlyahead.com or at the mailing address listed above. All comments or questions received will receive a written response. A record of all comments and questions and responses will also be posted on the website.

Our website has an “Available Properties” section which can be used to assist businesses in site selection. We will use this feature to showcase the subject Site to attract developers/investors. CCEDC will also keep key public officials updated on the cleanup and redevelopment of the Site including the Regional PADEP office – located in Williamsport, PA, which has regulatory

authority under PA Act 2.; Clearfield County Commissioners, and State Senator Joseph Scarnati, President Pro Tempore of the Senate, and a great partner and friend to Clearfield County.

Continued Community Involvement.

In conformance with USEPA guidelines, a legal notice will be placed in the local newspaper, The Clearfield Progress, announcing the availability of the administrative record for review and comment, including the environmental assessments. The administrative record will be available for review at the offices of the CCEDC during normal business hours of operation. During the comment period the information will also be available at the offices of Curwensville Borough during normal business hours of operation. Written comments provided during the 30-day comment period will become part of the administrative record. The administrative record will be updated with the inclusion of reports and other communications.