

COMMUNITY INVOLVEMENT PLAN

US EPA REGION 7 BROWNFIELDS ASSESSMENT GRANT & RLF GRANT
BF#:97782001, BF97764501, BIL 4B96709001

**YMCA SITE
480 S 3RD ST, CLINTON, IOWA 52732**

Prepared for:

**CITY OF CLINTON
611 S 3RD ST
CLINTON, IA 52732**

Prepared by:



**East Central Intergovernmental Association
7600 Commerce Park
Dubuque, IA 52002**

March 2022/Updated June 2024

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1.0 INTRODUCTION

The City of Clinton applied for two loans with East Central Intergovernmental Association (ECIA) to cleanup identified environmental contaminants of the YMCA site located at 480 S 3rd St in Clinton, Iowa (site). ECIA will utilize the U.S. Environmental Protection Agency Brownfields RLF Grant program to evaluate, design and implement a permanent cleanup remedy for the contaminated site. Cleanup of the site will enable the City to make a sound decision regarding the future use of the site and help protect the environment and mitigate the risk of potential human exposure. The City plans to seek a developer to remodel and redevelop the subject property. Redevelopment of the site would eliminate the blight and nuisance, add occupancy of residents to the downtown and add additional commercial business(es) to the downtown.

The purpose of the Community Involvement Plan (CIP) is to describe the approach proposed by the City for informing and engaging citizens of the community on the objectives, approach and proposed cleanup and reuse of the former YMCA site. Outreach is critical for assuring the local investment of public funds considerate of community priorities, neighborhood livability and environmental justice and equality.

The CIP has been designed to reach active citizens in the Clinton community who will provide meaningful input and active involvement on the proposed cleanup and reuse project. The long-term success of the project will be enhanced through a community that has a say during the development phase, and ultimately supports the project mission.

2.0 CONTACTS AND INFORMATION REPOSITORY

The City contact for this project is Tammy Johnson, Community Development Director who may be contacted at:

City of Clinton
611 S 3rd St
Clinton, IA 52732
tammyjohnson@cityofclintoniowa.us
(563) 242-2144

The information repository for this project including the environmental assessments and Analysis of Brownfields Cleanup Alternatives is located electronically at:

<https://www.cityofclintoniowa.gov/162/Former-YMCA-Brownfields-Cleanup>

Individuals may view the public repository online 24/7 or for individuals who do not have a computer access to the public repository can be made with public computers at the Clinton Public Library, 306 8th Avenue South, Clinton, Iowa during normal business hours of Monday – Thursday, 9:00AM - 8:00PM; Friday, 10:00AM - 5:00PM; and Saturday, 10:00AM - 2:00PM.

The U.S. EPA Region 7 project officer is Jennifer Morris, who may be contacted at:

Brownfields and Land Revitalization
Region 7 EPA
11201 Renner Blvd
Lenexa, KS 66219
Morris.jennifer@epa.gov
(913) 551-7341
<http://www.epa.gov/region07/>

The environmental consultant assisting the City with this project is Jon Reis, of Impact7G, Inc. who may be contacted at:

Impact 7G, Inc.
8951 Windsor Parkway
Johnston IA 50131
jreis@impact7G.com
(515)473-6256

The project manager for the ECIA Brownfields RLF program is Dawn Danielson, who may be contacted at:

ECIA
7600 Commerce Park
Dubuque, IA 52002
ddanielson@ecia.org
(563)580-1976

3.0 SITE LOCATION AND DESCRIPTION

The Site is developed with an approximately 63,106 square foot former YMCA facility and is located at 480 South 3rd St, Clinton, Iowa (refer to Appendix A & B). The property consists of approximately 0.964 acres on parcel # is 80-15620000. The original YMCA structure was built in 1905 and several additions were added to the building over the years. The building has been primarily abandoned and vacant for over four years.

The Site is located on corner of South 3rd Street and 5th Avenue South in downtown Clinton. The Site is in an area of mainly commercial and residential use. Surrounding properties historically consisted of residential dwellings and commercial business, the former Clinton Post Office, and a gas station. Commercial businesses included a paint shop, self-serve laundry, photo shop, bicycle shop, funeral home, carpet store, grocery store, drug store, hardware store, etc. The gas station was gone by the 1980s when the Iowa DNR began regulating underground

storage tanks (USTs). Adjacent properties include:

- To the north: Church, Dental office, bookstore and city parking lot and park
- To the east: Deli, Bank and Furniture Store
- To the south: Former US Posit Office (vacant) & commercial property including a bookstore
- To the west: Law firm and retail store

Fifth Avenue is the primary east/west thoroughfare in Downtown Clinton covering three blocks and connects the downtown to the Mississippi River and Discovery Trail. The street further connects the area to US Highway 67 and 30. Site has good visibility to traffic. It has been deemed a potential catalyst site for redevelopment in the downtown area.

4.0 SITE HISTORY

Downtown Clinton has served the central business district for this waterfront community. Buildings such as the original YMCA serve as a reminder of the rich history and unique character of the downtown area.

Based on a Phase I Environmental Site Assessment conducted by Terracon, Consultants, Inc. (Terracon) in September 2021 the site was first developed circa 1897 with the YMCA building on eastern portion and two residential dwellings with outbuildings on the western portion of the property. Additions to the building were constructed around the years 1906, 1960, 1978, and 1980. One of the two residential dwellings was razed in 1960 and the second residential dwelling was razed in 1980.

Historical city directories and Sanborn maps along with aerial photographs reflect the following timetable for Property use:

Year(s)	Description
1885-1890:	Site undeveloped
1897-1902:	YMCA and two residential dwellings
1909:	YMCA is now depicted with swimming pool and two asbestos-covered boilers.
1917-1950:	YMCA pool and boilers are no longer depicted.
1967:	An addition has been constructed on west side of YMCA and one residential dwelling remains.
1970:	Significant changes from the 1967 Sanborn Map were not observed.
1980s:	House on western portion of site appears to have been razed to make room for YMCA expansion.
1990-2019:	No significant changes observed.

YMCA occupied the property from 1897 through May 2010. In 2010 the YMCA combined with the YWCA and vacated the buildings at 480 S 3rd St. The YMCA provided space to Victory Center,

a local nonprofit organization that offered transitional housing to men in the community from 2010 to 2020.

Unfortunately, the building has not been updated or properly cared for more than a decade. It has become a detriment to the downtown and contributes to the blight in the city. Due to being underutilized and vacant in recent years, the building was vandalized and attracted squatters. The City of Clinton acquired the property via Tax Sale Deed (Document #2020-06408) on August 3, 2020.

5.0 ENVIRONMENTAL CONDITION

The buildings are currently unoccupied. Trash and debris including furniture, appliances, and miscellaneous building material are scattered throughout the buildings. There is significant water and structural damage throughout the buildings.

A Phase I was conducted by Terracon on 9/10/21 in general accordance with ASTM E1527-13 to identify recognized environmental conditions (REC) associated with the property. The following RECs were identified during the Phase I ESA:

- Adjacent site to the northeast was identified as a historical gas station with three gasoline tanks. This station operated prior to regulatory oversight.

The Phase I ESA also indicated that the buildings may contain asbestos-containing materials and lead-based paint.

A Phase II Environmental Site Assessment (Phase II) was completed by Terracon on March 3, 2022. In February the Phase II was performed to address the REC identified in the Phase I ESA. Field activities included the advancement of three soil borings for the collection of soil. Bedrock was encountered between 4.5 and 7 feet at the site. Therefore, groundwater samples could not be collected as part of the investigation. The analytical results of soil samples indicated the soil had slightly elevated levels of lead (454 mg/kg) which exceeds the SWS of 400 mg/kg.

The City of Clinton sent the Phase I and Phase II findings to the IA DNR for review and recommendations. The IA DNR replied with a letter to the city indicating that while the levels exceeded state screening standards the IA DNR did not find evidence suggesting the existence of a hazardous condition and therefore will not require further assessment.

An Asbestos and Lead Based Paint Inspection was completed on March 5, 2021 by Environmental Management Services of Iowa, Inc. A supplemental updated Asbestos and Lead Based Paint Inspection was completed on October 21, 2021 and January 14, 2022 by Terracon Consultants, Inc and a supplemental updated Asbestos Inspection was completed by Impact 7G, Inc between April 29 and May 17, 2024 . Asbestos-containing materials (ACMs) were identified in the samples collected from various areas of the buildings. Impact 7G Inc is in the process of

preparing an Asbestos Abatement Cleanup Plan for the abatement contractor to abate regulated asbestos containing materials that exceed statewide standards in the building prior to deconstruction or demolition and an Analysis of Brownfields Cleanup Alternatives Report to determine cost associated with potential cleanup of the site.

Asbestos was detected in 71 of the 407 samples collected from various building components within the Property's interior and exterior. The following table provides a summary of the identified ACM, its location, and estimated quantities:

Material Substance	Location	Asbestos Content	Est. Quantity
Heat Exchanger Mag Insulation / Mag Pipe Insulation	1961 Building – Basement Pool Filter/Mechanical Room 1905 Building – Basement Stair Landing; Basement Room B-5 and B-9 Boiler Room	2% Chrysotile / 5% Amosite 2-12.75% Chrysotile	1961 Building: 10 SF 1905 Building: 30 LF
Muddled Fitting / Muddled Joint Fitting	1961 Building – Basement Pool Filter/Mechanical Room; Sub-Level Shower Chase; Women's and Girl's Locker Rooms; 2 nd and 3 rd Floor Between Floors and Walls to Restrooms 1905 Building – Basement Boiler Room; Basement Near South Storage; 1 st Floor Restroom Chase; Basement Boiler Room T6; Basement SE Chase T6; 1 st Floor Restroom T6; Basement Rooms B-1 through B-11; 1 st Floor Rooms 3, 6, and Boy's Restroom Pipe Chase	2-12.50% Chrysotile 2-10% Chrysotile / <1-5% Amosite	1905 Building Basement: 233 1 st Floor: 24 2 nd Floor: 11 1961 Building Basement: 219 1 st Floor: 46 2 nd Floor: 12
Muddled Joint Fitting Canvas Wrap	1961 Building – Women's and Girl's Locker Rooms; 2 nd and 3 rd Floor Between Floors and Walls to Restrooms 1905 Building – Basement Rooms B-1 through B-11; 1 st Floor Rooms 3, 6, and Boy's Restroom Pipe Chase	1.5% Chrysotile	Included in the above Muddled Fitting / Muddled Joint Fitting
Woolsfelt Pipe Insulation / Layered Pipe Insulation	1961 Building – Basement Pool Filter/Mechanical Room; Women's and Girl's Locker Rooms; 2 nd and 3 rd Floor Between Floors and Walls to Restrooms 1905 Building – Basement Boiler Room; Basement Stair Landing; 1 st Floor Restroom Chase; Basement Rooms B-1 through B-11; 1 st Floor Rooms 3, 6, and Boy's Restroom Pipe Chase	2-8% Chrysotile	1905 Building: 1,800 LF 1961 Building: 700 LF
Mud on Breeching	1905 Building – Basement Boiler Room	10% Amosite	200 SF
Various Colors of 9" x 9" Floor Tile and Black Mastic	1905 Building – Basement Southeast Room; Basement Southeast Corner of Room B-1; 1 st Floor Room 4; 2 nd Floor Kitchen; 2 nd Floor North, South, and East Hallways; 2 nd Floor Restroom; 2 nd Floor Rooms 7-9; 3 rd Floor Common Room; Basement Room B-2	Floor Tile: 2.8-12.2% Chrysotile Mastic: 1.1-3.5% Chrysotile	1905 Building Basement: 650 SF 2 nd Floor: 320 SF
Various Colors of 9" x 9" Floor Tile	1905 Building – Basement Southwest Main Area; 2 nd Floor South Restroom Southeast Corner (under sheet flooring); 1 st Floor West Side of Lobby (beneath carpet); Basement Room B-1; Basement Stair Landing; 1 st Floor Room 3; 1 st Floor West Side Storage; Basement Room B-2 1961 Building – Sub-Level Women's and Girl's Locker Rooms; 1 st Hallways; Stairwells to 2 nd Floor	1.2-5.8% Chrysotile	1905 Building Basement: 2,328 SF 1961 Building Basement: 2,240 SF 1 st Floor: 770 SF 2 nd Floor: 1,363 SF 3 rd Floor: 150 SF

Material Substance	Location	Asbestos Content	Est. Quantity
Cement Board Ceiling / 2' x 2' Cement Board	1905 Building – Basement Southwest Side Main Area; Basement Room B-4 and Room B-1 1961 Building – Large Pool Room Ceiling 1978 Building – Small Pool Room	18-25% Chrysotile	<u>1905 Building</u> Basement: 1,376 SF <u>1961 Building</u> Basement: 8 SF <u>1st Floor</u> : 3,700 SF <u>1978 Building</u> <u>1st Floor</u> : 132 SF
Ceiling Tiles	1905 Building – Basement Near South Storage	<1% Chrysotile	2,300 SF
Air Handler Vibration Cloth	1905 Building – Basement North Air Handler; Basement Mechanical Room 1961 Building – Basement Pool Mechanical Room; Mezzanine Mechanical Room	20-50% Chrysotile	<u>1905 Building</u> Basement: 2 <u>1961 Building</u> <u>1st Floor</u> : 9
Various Colors of Floor Tiles	1905 Building – 1 st Floor Southeast Room; 1 st Floor Storeroom Behind Counter; 2 nd Floor Kitchen; 2 nd Floor North Room	2-5% Chrysotile	<u>1905 Building</u> <u>1st Floor</u> : 1,610 SF 2 nd Floor: 3,620 SF 3 rd Floor: 1,390 SF
Various Colors of Floor Tiles and Black Mastic	1978 Building – 1 st Floor Locker Room Lobby	Floor Tile: 2% Chrysotile Mastic: 2% Chrysotile	<u>1978 Building</u> <u>1st Floor</u> : 2,362 SF 2 nd Floor: 740 SF 3 rd Floor: 185 SF
Exterior Caulk	1905 Building – Exterior Northeast Entry 1961 Building – Exterior Vents and Wall Penetrations	1.9-2% Chrysotile	1905 Building: 40 LF 1961 Building: 100 LF
Built-Up Roof Layers	1961 Building – Roof Flashings 1978 Building – Roof Flashings	2-10% Chrysotile	1961 Building: 520 LF 1978 Building: 585 LF
Door Gasket	1905 Building – Basement Boiler Room Boiler 1	40% Chrysotile	2 Gaskets
2' x 2' Ceiling Tile – Pinholes and Slight Texture	1905 Building – 1 st Floor Room 5 Southeast Corner	1.75% Amosite	2,800 SF
Various Colors of 12" x 12" Floor Tile and Black Mastic	1961 Building – East Gym Offices 1978 Building – West Locker Rooms; Hallways; Stairwells; 2 nd Floor Hallways; West Gym Offices; 3 rd Floor Hallways and Stairwell; Custodial Closet 1980 Building	Floor Tile: 2.8-12.2% Chrysotile Mastic: 1.1-3.5% Chrysotile	3,600 SF
Wall Paneling Caulk	1905 Building – 2 nd Floor North Room; 2 nd Floor Rooms 12 and 13	3.8-4.6% Chrysotile	1,800 SF
Roof Tar	1961 Building – Roof Parapet	2% Chrysotile	280 LF
Flashing Tar	1905 Building – Stairwell Roof	3% Chrysotile	75 LF
Parapet Tar	1905 Building – Roof Parapet	3.1% Chrysotile	320 LF

6.0 SITE REMEDIATION PROCESS

The remediation plan for the Former YMCA will include abatement of asbestos materials and best practices for construction workers exposed to lead-based paint waste that may be disturbed during the asbestos abatement to obtain a certification from a qualified environmental professional that the identified asbestos-containing material has been safely removed in accordance to Iowa DNR state requirements and the requirements of the EPA Brownfields Revolving Loan Fund Grant program and the Loan Agreement between ECIA and the City. Mold will be remediated once the asbestos has been abated.

Data generated from the Asbestos Inspection and included in the remediation Plan will evaluate health risks and potential cleanup remedies. Potential corrective remedies are evaluated to determine the most efficient and effective method to manage the asbestos that is above statewide standards and mold contamination identified on the property with respect to proposed future redevelopment of the property. This information is part of the Analysis of Brownfields Cleanup Alternatives (ABC) and is being prepared by Impact 7G. The ABC will be part of the city's public repository webpage. A public notification and comment period intended to inform the community of the findings and recommendation will be conducted prior to abatement. Upon addressing public comments, the ABC will be finalized, and the public repository will be updated.

At this point in the process, bid documents are prepared for implementation of the abatement. The City will solicit costs and qualifications to implement the abatement of the site. Impact 7G has prepared a SSQAPP draft being reviewed by the City, ECIA and EPA. The City will also coordinate with EPA and SHPO to ensure any state or federal requirements are included in the SSQAP.

The contractor will notify IA DNR ten days prior to commencing the abatement project. Once approval from EPA, ECIA, city and IA DNR is obtained, contractor will implement abatement in compliance with all state, federal and program requirements. During the abatement compliance samples are collected and analyzed to monitor air quality in compliance with the SSQAP. Upon completing the abatement, a qualified environmental professional will prepare a certificate of completion and final documentation for review by Impact 7G, ECIA and EPA.

7.0 COMMUNITY PROFILE

Clinton is the county seat of Clinton County in east-central Iowa, situated along the Mississippi River. First known as New York, it was renamed in 1855 in honor of DeWitt Clinton, then the governor of New York State. During the same time period, this small hamlet was regarded as the sawmill capital of the nation. With the city's location on the Mississippi River and major roads and railroad lines the city became a transportation hub. Numerous sawmills were established supplied by raw timber floating down the river from the forests of Minnesota and Wisconsin.

In the late 1970's the manufacturing industry became fiercely prosperous in Clinton as the sawmill industry diminished. The river and railroad lines provided affordable and comparatively rapid transportation of raw goods and finished products.

The community is served by U.S. Highways #30 and #67 and Iowa Highway #136. Highway #30 provides four-lane freeway access to Interstate #80 (via U.S. #61), about 45 miles to the southwest, and two-lane access to Interstate #88, about 30 miles east. Clinton is served by a publicly operated intra-city bus system.

Barge traffic is available on the Mississippi River. Rail service is provided by the Union Pacific and Iowa, Chicago, and Eastern Railroads. There are 13 motor freight carriers in the community.

The municipally owned airport is five miles west, just outside Clinton city limits on U.S. Highway #30. The airport has paved and lighted runways of 4,200 and 5,200 feet. All airport service is by private carrier. The Quad Cities International Airport, in Moline, IL, (45 miles south) is the nearest airport that provides commercial flights.

Major cities within a 300-mile radius include Chicago, IL, (150 miles east), St. Louis, MO, (225 miles south), Des Moines, IA, (195 miles west), and Minneapolis, MN, (300 miles north).

Below is a list of major employers within the region. Manufacturing employment remains the largest overall source for private jobs in the Clinton area, but, as is typical in smaller counties, employment at non-profits and governments is a growing percentage of the workforce.

Company	Industry	# of Employees
MercyOne	Healthcare	950
Archer Daniels Midland ADM	Manufacturing	750
Custom-Pak, Inc	Manufacturing	725
Clinton Community School District	Education	552
3M	Manufacturing	450
MacLean-Fogg (Metform)	Manufacturing	400
Timken Drives	Manufacturing	430
WestRock	Manufacturing	246
Clystar	Manufacturing	300
LyondellBasell	Manufacturing	317
Wild Rose Casino	Service/Entertainment	346
Elkay Manufacturing	Manufacturing	310
Data Dimensions	Digital Imaging	300
City of Clinton	Municipality	296
Collis, Inc	Manufacturing	265
Nestle Purina PetCare	Manufacturing	434
Clinton County	County Government	200
Wendling Quarries, Inc.	Building Materials	225
Skyline Center Inc	Assembly/Packaging	150
Focus Services	Call Center	140
TMK IPSCO	Manufacturing	138
Colony Brands	Retail	131
J.T. Cullen	Manufacturing	125
Clausen Supply Co.	Trucking & Warehousing	98
Agri-King	Value-Added Agriculture	120
The Egging Company	Manufacturing	80
Sethness	Manufacturing	75
Economy Coating	Rail Car Repair	75

Source: Clinton Regional Development Corp. (June 2021)

With a 2020 population of 24,469, Clinton is the 19th largest city in Iowa. Clinton reached its highest population of 34,719 in 1970. Population for both the City of Clinton and Clinton County has decreased every census year.

Between 2010 and 2018, the Iowa Population Report published in April 2019 found that 69 of Iowa's 99 counties have experienced a population loss. Among these, Clinton County suffered the greatest loss, with 2,600 residents moving to other counties or states. However, Iowa's population continues to increase. A summary of the population is below.

Year	Population	Growth	Annual Growth Rate
2021	25,037	-28	-0.11%
2020	24,469	-624	-2.55%
2019	25,093	-28	-0.11%
2018	25,121	-287	-1.13%
2017	25,408	-244	-0.95%
2016	25,652	-200	-0.77%
2015	25,852	-251	-0.96%
2014	26,103	-244	-0.93%
2013	26,347	-251	-0.94%
2010	26,855	-508	-0.18%
2000	27,772	-1,429	-0.50%
1990	29,201	-3,627	-1.16%
1980	32,828	-1,891	-0.56%
1970	34,719	1,130	0.33%

The average household income in Clinton is \$61,422 with a poverty rate of 1.34%. The median rental costs in recent years come to \$687/month, and the median house value is \$99,500. The median age in Clinton is 40.9 years according to the US Census 2019 ACS 5-Year Survey.

Below is a table that reflects the city and county workforce data available through June 2021.

	Clinton Area Workforce								
	2013	2014	2015	2016	2017	2018	2019	2020	Jun-21
Clinton Workforce	12,888	12,893	12,605	12,077	11,719	11,545	11,983	11,010	11,235
Clinton Unemployed	694	674	618	605	446	393	508	619	718
County Workforce	24,960	24,850	24,450	23,910	22,860	22,710	23,216	21,256	21,714
County Unemployed	1,438	1,320	1,240	1,200	850	650	946	1,056	1,268

Source: Bureau of Labor Statistics / Iowa Workforce Development (through June 2021)

As the labor force decreased, organizations such as Clinton Regional Development Corporation, Clinton County Community Student Loan Assistance Program, and Home Base Iowa have established initiatives to draw new employees into the region, offer student assistance for graduates, and connect veterans with job opportunities throughout the local region and state.

8.0 COMMUNITY INVOLVEMENT

With the assistance of MSA, the City created a Master Plan in 2020 that included feedback from a variety of stakeholders and individuals from throughout the community. The YMCA Site was

specifically identified in the plan as a property that was important to the downtown area. The citizens of Clinton recommended in the plan that the non-historic portion of the building be torn down and the remaining historic structure on the corner of 3rd St and 5th Avenue be renovated. Potential redevelopment for the site to be office and/or residential.

The City seeks to engage the community with the YMCA cleanup project. Many methods of communication will be utilized to keep the community familiar with the status of the project. These methods will offer citizens the chance to ask questions, offer suggestions, and provide comments.

The following table summarizes the community involvement activities completed to date:

Date	Description
January 2019 – August 2019	City of Clinton worked with MSA to create Downtown Master Plan in 2019. Public engagement/meetings held.
July 2021 to May 2024	Environmental assessments conducted on site to determine contaminants. Asbestos, lead-based paint and mold were found in building materials.
August 10, 2021	City approved submission of ECIA Brownfields Revolving Loan Fund Application
December 2021	City created an electronic public repository on its website devoted to the brownfield's revitalization efforts for the YMCA site.
February 9, 2022	Site revisioning flyer circulated via city email alert, Facebook, and website
February 17, 24, March 3, 2022, March 15, 2022	Downtown Clinton Alliance focus meetings conducted to update downtown neighbors of YMCA site revisioning and to gather feedback from public.
February 22, 2022	Clinton Herald published article about focus meetings and upcoming public meetings regarding the YMCA site revisioning plan and site cleanup.
January 24, 2023	Site Revisioning plan submitted to public and city council for approval. Council approved plan.
February 13, 2024	City selected Impact 7G Inc to be its environmental consultant on the YMCA project
April 9, 2024	City approved submission of application for additional funds from ECIA Brownfields Revolving Loan Fund

The following is a list of the current or planned outreach initiatives.

Online Presence: A webpage titled Former YMCA Redevelopment/Brownfields Cleanup created under Economic Development on city of Clinton website located at http://www.cityofclintoniowa.us/departments/Administration/former_ymca_brownfields_cleanup.php. This webpage includes a repository of project information. When appropriate, project updates and other information will be shared on the City's Choose Clinton Facebook page. This online presence will serve as a source of news and information regarding the site and its status.

Clinton Historic Preservation Commission and SSMID II – Downtown Clinton Alliance: Downtown Clinton Alliance will be invited to participate in public meetings and be asked to

provide feedback on the proposed cleanup plan for the site.

Public Notice: The City will post a Public Notice with comment period and public meeting on the draft Site ABCA. The notice will be published on the city website, the local newspaper and at public buildings (e.g., city office, library).

30-Day Comment Period: The City will hold a 30-day comment period to allow the community an opportunity to review and provide feedback on the draft Site ABCA. The draft cleanup plan and related background documents will be available at City office and on the City's website. The City will accept written comments on the ABCA and Cleanup plan and will prepare a written response to significant concerns.

Additional Public Meetings: Following the comment period the City plans to host one or more public information meetings regarding the cleanup program. City representatives and/or consultants will be present to fully answer the community's questions. When applicable, public meeting announcements, including date, time, place and purpose of the public meetings will be submitted by press release to appropriate media outlets including the local newspaper.

Project Signage: Signage will be posted at city hall located at 611 S 3rd St to direct residents to sources of project information including City representatives and city of Clinton website.

Meeting Notices and Email Updates: When applicable, public meeting announcements, including date, time, place, and purpose of the public meetings will be submitted by press release to appropriate media outlets, including *The Clinton Herald*, the local newspaper.

Updates on the project will be posted on the city website and documents will be added to the information repository, such as public meeting minutes, draft remediation work plan and closure documents.

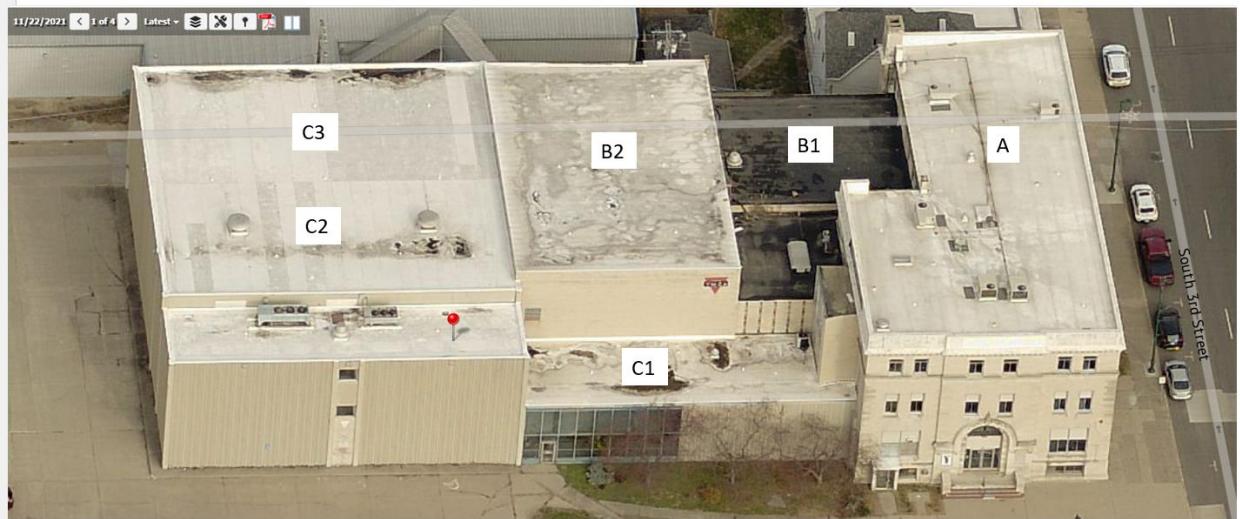
Site signage: Signage regarding the cleanup project will be posted at the site.

9.0 PROJECT SCHEDULE

The city of Clinton seeks to abate asbestos of the former YMCA buildings by the close of 2025. In accordance with the city's goals, the following milestones and associated schedule have been developed. The schedule is preliminary and may change based on subcontractor availability, weather conditions, and turnaround time for review of documents by the city, regulators, and other stakeholders, among other factors.

Task	Description	Start Date	End Date
1	Community Involvement Plan (CIP) draft, comment period, final; Plan updated/revised 06/03/2024	11/2/21	06/2024
2	Draft of Asbestos & Lead Abatement Plan 3/10/22; New Asbestos Remediation Plan (in process)	02/8/22	
3	Draft of ABCA (initial draft 03/31/22; revision in process)	06/2024	
4	Draft Site-Specific Assurance Quality Plan (initial plan 3/31/22; revision in process)	05/2024	
5	Bid package preparation, bid request, contractor selection	06/2024	
6	Public Notice of draft Cleanup Plan, ABCA for review and available for public comment	06/2024	
7	Public Outreach/Meeting	06/2024	
8	Submit Cleanup Plan, ABCA, CIP, QAPP to EPA for review/approval	06/2024	
9	Prepare/Submit SHPO to Iowa Historic Preservation Office (initial Site inventory form prepared 06/2022; EPA working on MOA)	04/2022	
10	Cleanup Implementation – Phase 1a [Separate Building B1 and C1 from Building A, secure entrance points to Building A and abatement of ACM in Building A]	10/2024	
11	Public Outreach meeting/event – project update	12/2024	
12	Phase 1b: Mold Remediation following Phase 1a	12/2024	
13	Phase 2: Abatement and/or RACM demolition of Buildings B2, C2 & C3	03/2025	
14	Closeout Report Completed	07/2025	
15	Presentation of Cleanup Completion Report to Council & Public	07/2025	

Appendix A: Site Aerial Map



City of Clinton procure via Tax Cert on August 3, 2020

A: Original 1905

C1: Walk Way

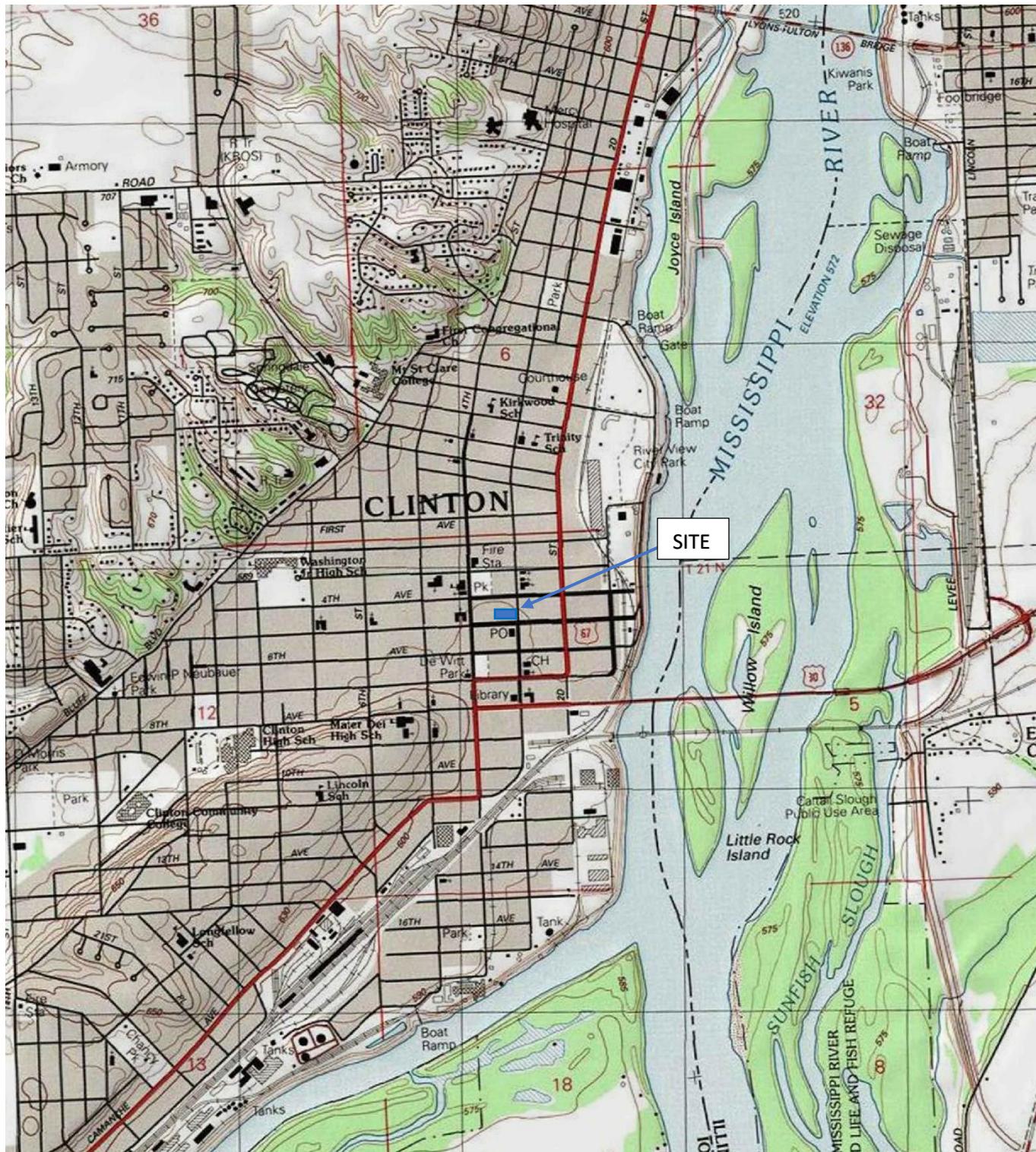
B1: Racquetball

C2: New Gym and running track

B2: Cool Pool 1st, Gym 2nd

C3: Hot Pool

Appendix B: Site Vicinity Map



Topographic Site Map from ARCGIS Map Server
<http://services.arcgisonline.com/ArcGIS/services>

Appendix C: Acronyms

AAI	All Appropriate Inquiries
ACM	Asbestos containing materials
ABCAs	Analysis of Brownfields Cleanup Alternatives
BFPP	Bona Fide Prospective Purchaser
BRF	Brownfields Revolving Fund
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CPO	Contiguous Property Owner
CIP	Community Involvement Plan (aka Community Relations Plan)
DBE	Disadvantaged Business Enterprise
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
IA DNR	Iowa Department of Natural Resources
ILO	Innocent Landowner
LBP	Lead-based Paint
LUST	Leaking Underground Storage Tank
NPL	National Priorities List
SHPO	State Historic Preservation Office
SSQAPP	Site Specific Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
USEPA	United States Environmental Protection Agency

Appendix D: Glossary

This glossary defines some terms associated with Iowa's Brownfields Cleanup Program.

All Appropriate Inquiries (AAI)

Steps a prospective owner must take to qualify for Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner liability protections. A property owner must perform “all appropriate inquiry” into the previous ownership and uses of property before acquisition of the property. EPA published the Final Rule for All Appropriate Inquiries (AAI) on November 1, 2005. This rule became effective on November 1, 2006. The ASTM E1527-13 Phase I Environmental Site Assessment standard is consistent and compliant with the EPA final rule and may be used to comply with the requirements for AAI.

Administrative Record

A record of all documents (hard copies, electronic files, briefing charts, files, photographs, or other documents and records) relied upon in preparing an EPA document. The administrative record documents the proponent's consideration of all relevant and reasonable factors and should include evidence of diverging opinions and criticisms of the proposed action or its reasonable alternatives.

Analysis of Brownfields Cleanup Alternatives (ABCa)

An analysis of various alternative environmental cleanups for the site that meet the targeted cleanup levels.

ASTM International Phase I Environmental Site Assessment

Provides standards for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and petroleum products. Use of this practice permits a user to satisfy one of the requirements to qualify for the innocent landowner, bona fide prospective purchaser, and contiguous property owner, defenses to CERCLA liability: that is, the practices that constitute “all appropriate inquiry into the previous ownership and uses of the facility in accordance with generally accepted good commercial or customary standards and practices” as defined in 42 USC § 9601(35)(B).

Beneficial reuse

A use for the property that benefits the community and is the highest, best use of the property.

Bona Fide Prospective Purchaser (BFPP)

A CERCLA liability protection for property owners that have acquired property after January 11, 2002. The specific requirements that a landowner must meet to qualify for this liability protection is described in CERCLA § 101(40) and § 107(r).

Brownfield

Real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. (CERCLA § 101(39)(A).)

Community Involvement Plan

Specifies the community involvement activities that the borrower plans to undertake during the cleanup.

Compliance

Refers to systems to comply with relevant laws and regulations.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

Commonly known as Superfund, this law was enacted by Congress on December 11, 1980. CERCLA provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment.

Contamination

Introduction into water, air, and soil of microorganisms, chemicals, toxic substances, wastes, or wastewater in a concentration that makes the medium unfit for its next intended use. Also applies to surfaces of objects, buildings, and various household and agricultural use products.

Contiguous Property Owner (CPO)

A CERCLA liability protection that “protects parties that are essentially victims of pollution incidents caused by their neighbor’s actions.” Contiguous property owners must perform all appropriate inquiry prior to acquiring property to qualify for this protection. Persons who know, or have reason to know, prior to purchase, that the property is or could be contaminated, cannot qualify for the CPO liability protection. A landowner must meet the criteria set forth in CERCLA § 107(q) to qualify. Note that a purchaser who does not qualify as a CPO may still qualify as a bona fide prospective purchaser (BFPP).

Data Quality Objectives/Quality Assurance Project Plan (DQO/QAPP)

Data Quality Objectives, or DQOs are qualitative and quantitative statements that specify the quality of data required from a particular activity to support specific decisions. A Quality Assurance Project Plan, or QAPP, is a written document outlining the procedures a monitoring project will use to ensure the data it collects and analyzes meets project requirements and/or DQOs.

Greenfields

Greenfields (aka greenspace) are generally parkland, undeveloped open space and agricultural lands located near the outskirts of towns, cities, and larger metropolitan

areas. These areas help delineate one village, city, or town from another, or where development is occurring and where it is not. When they are protected, greenfields can serve to promote growth in already-developed areas and curb urban sprawl. As parks and greenways, they also provide the green infrastructure essential to livable communities.

Exposure

The amount of pollutant present in a given environment represents a potential health threat to living organisms.

Hazardous waste

By-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special EPA lists.

Information Repository

A location where all documents related to site activities are stored and made available to the public.

Innocent Landowner (ILO)

A CERCLA liability protection for property owners who have performed all appropriate inquiry prior to purchase and who did not know, or have reason to know, of contamination. A person must meet the criteria set forth in CERCLA § 107(b)(3) and CERCLA § 101(35) to qualify as an innocent landowner.

Institutional control

A legal or administrative action or requirement imposed on a property to limit or prevent property owners or other people from coming into contact with contamination on the property. Institutional controls may be used to supplement a cleanup (by limiting contact with residual contamination), or may be used instead of conducting a cleanup.

Land Recycling Program (LRP)

The Land Recycling Program (LRP) allows owners or other stakeholders of a property to voluntarily assess and implement remedial actions at a site that is contaminated or is perceived to be contaminated. The assessment of the property must address the severity of the contamination problems and the risks associated with the contamination. The Department will provide a No Further Action Certificate for the site following assessment and implementation of appropriate cleanup activities and/or other remedies to assure the protection of public health and the environment. This certificate shall provide limited liability protection from further regulatory action relative to the problem(s) addressed.

Licensed Remediation Specialist (LRS)

An individual certified by the WVDEP to perform professional environmental services and to supervise the remediation of contaminated sites through the West Virginia Voluntary Remediation Program.

Resource Conservation and Recovery Act (RCRA)

This law was enacted by Congress on October 21, 1976 to address the increasing problems the nation faced from the growing volume of municipal and industrial waste. RCRA gives the U.S. EPA authority to control hazardous waste from “cradle-to-grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

Resource Conservation and Recovery Act Corrective Action (RCRA CA)

Corrective action is a provision under the Resource Conservation and Recovery Act that requires facilities which treat, store, or dispose of hazardous wastes to investigate and clean up releases into soil, groundwater, surface water, and air. Corrective action is principally implemented through RCRA permits and orders.

Revolving Loan Fund (RLF)

RLF is a self-replenishing pool of money, utilizing interest and principal payments on old loans to issue new ones. RLFs are a gap-financing measure primarily used for development and expansion of small businesses.

Risk Evaluation and Response Action (RE/RA) plan

Qualitative and quantitative evaluation of the risk posed to human health and/or the environment by the actual or potential presence and/or use of specific pollutants and how that risk can be resolved.

Standards

Values, which represent concentrations of contaminants in groundwater and soil for which normal, unrestricted exposure is considered unlikely to pose a threat to human health.

Appendix E: Resources

The following is a list of website links to the agencies, laws, codes, and rules mentioned throughout the document:

U.S. EPA Brownfields Program: <https://www.epa.gov/brownfields>

IA Department of Natural Resources: Land Recycling Program:

<https://www.iowadnr.gov/environmental-protection/land-quality/contaminated-sites/land-recycling-program-lrp>

Comprehensive Environmental Response, Compensation, and Liability Act (Superfund):

<https://www.epa.gov/superfund/superfund-cercla-overview>

Brownfields All Appropriate Inquiries: <https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries>

CERCLA Liability and Local Government Acquisitions:

<https://www.epa.gov/enforcement/guidance-superfund-liability-protections-local-government-acquisitions>

Resource Conservation and Recovery Act (RCRA): <https://www.epa.gov/rcra>