



DECISION MEMORANDUM

Former YMCA Building – Phases 1a and 1b
480 South 3rd Street
Clinton, Iowa 52732

City of Clinton
Brownfield Revolving Loan Fund Project
EPA Cooperative Agreement No. BF97764501 & BIL96709001

Prepared for:

City of Clinton
611 South 3rd Street
Clinton, Iowa 52732

East Central Intergovernmental Association
7600 Commerce Park
Dubuque, Iowa 52002

Report date:

November 26, 2024

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1.0 PURPOSE

The purpose of this Decision Memorandum is to document the proposed environmental cleanup at the former Young Men's Christian Association (YMCA) building at 480 South 3rd Street (see Appendix A) in downtown Clinton, Iowa 52732 (hereinafter referred to as the "Site"), as a requirement of the ECIA Brownfields Revolving Loan Fund. This Decision Memorandum is based on the Analysis of Brownfield Cleanup Alternatives (ABC) and approved Asbestos Containing Materials (ACM), Mold Remediation, and Lead-Based Paint (LBP) Cleanup Plan document, and serves as notice to proceed with EPA Brownfields RLF funded activities.

The Site was deemed eligible for Brownfields Revolving Loan Fund (RLF) assistance by East Central Intergovernmental Association (ECIA) and the United States Environmental Protection Agency (US EPA). ECIA awarded the City of Clinton (City) two grant loans: a grant loan of up to \$250,000 with City match funds of up to 25% of eligible activity expenses; and a grant loan of up to \$400,000 without a match. The Site is planned to be redeveloped as a mixed use commercial and residential space.

The ECIA Brownfields RLF grants of \$650,000 will be used to fund Phase 1a and Phase 1b of environmental remediation efforts at the Site, as described in the October 2024 ABCA.

- Phase 1a will consist of regulated asbestos containing materials (RACM) demolition of Building B1 and a portion of Building C1 to isolate Building A. As Phase 1a consists only of demolition, mold and lead-based paint (LBP) are not addressed.
- Phase 1b will consist of full asbestos abatement of Building A, with the exception of roof parapet tar and any asbestos containing materials (ACM)s deemed historically significant by the Iowa State Historical Preservation Office (SHPO). All painted surfaces disturbed during asbestos abatement will be treated as LBP. Non-historic, mold-damaged materials disturbed in conjunction with asbestos abatement work will be remediated by removing the mold-damaged materials.

These remediation activities will prepare the Site for redevelopment. All conditions related to US EPA Brownfields funding are in effect, including compliance with the Davis-Bacon Act.

Eocene Environmental Group (Eocene) was retained by the City to oversee the technical aspects of the remediation in accordance with local, state, and federal regulations. The Eocene contact is Jon Reis and he can be reached at (515) 473-6256 and jreis@eocene.com. Dore and Associates is the contractor under contract to complete RACM demolition of Phase 1a. Dore and Associates can be reached at (989)-684-8411 and est@doreassoc.com. The contractor for Phase 1b will be procured at a later date.

Any changes to any approved scope of work and/or cleanup plan are to be pre-approved by the City and ECIA. This Decision Memorandum serves as approval for the use of ECIA Brownfields funding to implement Phase 1a and 1b of cleanup efforts as selected for the Site.

2.0 SITE SUMMARY

The Site is located on an approximately 0.964-acre parcel (Parcel #80-1562-0000) in downtown Clinton, Iowa (see Figure1). The Site is developed with a 27,000 basal square foot (SF) structure that was initially constructed in 1905 with multiple additions constructed from 1961 to 1980. The Site historically operated as a YMCA and the building consisted of small residential spaces and recreational facilities.

The City has owned the Site since August 2020 after the Site became a County-held tax certificate due to non-payment of property taxes. The Site was vacated by January 1, 2021, and electricity and water service have been shut off. The Site consists of six building sections as described below (see Figure 3):

- Building A – 6,504 basal SF, three-story brick and limestone structure with a basement constructed in 1905.
- Building B1 – 2,820 basal SF, two-story brick and block structure with a basement constructed in 1905.
- Building B2 – 6,764 basal SF, two-story precast concrete and brick addition with a basement/sub-level constructed in 1961.
- Building C1 – 492 basal SF, one-story precast concrete addition constructed in 1980.
- Buildings C2 & C3 – 10,283 basal SF, three-story precast concrete addition with a sub-level constructed in 1978.

The Site is eligible for listing in the National Register of Historic Places and federal funds are being used for the project. Therefore, the Iowa SHPO must review the project under Section 106 of the National Historic Preservation Act and approve proposed work.

2.1 Previous Environmental Assessment Activities

The Site has undergone numerous environmental assessment activities from 2018 to 2024. This Decision Memorandum provides an overview of previously completed assessment activities; however, a more detailed summary can be found in the ABCA and Asbestos Containing Materials, Mold Remediation, and Lead-Based Paint Cleanup Plan. Copies of these documents and all previously completed assessment reports are available in the online public repository (<https://www.cityofclintoniowa.gov/162/Former-YMCA-Brownfields-Cleanup>).

2.1.1 Phase I and Phase II Environmental Sites Assessments (ESAs)

Phase I ESAs completed in 2018 and 2021 determined a recognized environmental condition (REC) existed at the Site due to a historical gas station with tanks located 170 feet from the Property. In 2022, a Phase II ESA completed to investigate the REC discovered lead soil concentrations above the Iowa Department of Natural Resources (DNR) Statewide Standard. No other contaminants of concern were detected above Iowa DNR Statewide Standards at the Site. The Iowa DNR reviewed the Phase I and II ESAs and deferred the need for additional environmental assessment at the Site due to the low potential of known lead concentrations to adversely affect the environment or public health.

2.1.2 Mold

A Moisture and Microbial Investigation of Building A was completed in August 2022. Apparent water staining, microbial growth, and elevated indoor spore concentrations were observed throughout the building. Although outside of the scope of services of the report, significant moisture intrusion, microbial growth, and water damaged materials were noted in the 1961 and 1978 portions of the structure.

2.1.3 Asbestos Containing Materials

Asbestos Containing Materials Inspections were completed in 2021, 2022, and 2024. Asbestos was detected in 71 of the 407 analyzed samples within the referenced reports.

2.1.4 Lead-Based Paint

A Lead-Based Paint Screening, consisting of 121 readings, was completed in 2021. LBP was detected in multiple XRF readings in numerous buildings. However, all locations of LBP cannot be determined due to the limited number of XRF readings.

2.1.5 Structural Assessments

Select Structural Engineering completed a Structural Assessment of the Site in 2022 and determined Building B1 to be not salvageable. Further, September and October, 2024 letters issued by IMEG Corporation deemed Buildings B1, B2, C1, C2, and C3 to be unsafe structures. Therefore, the unsafe structures must be treated as regulated asbestos containing material (RACM) demolition due the presence of ACM in each structure.

2.2 Remediation Alternatives Analysis

In the ABCA, cleanup alternatives were considered for each of the identified contaminations of concern associated with the Site. Cleanup alternatives considered the structural condition of the buildings and redevelopment goals for the Site. As the Site is eligible for listing in the National Register of Historic Places and federal funds are being utilized for the project, alternatives for SHPO review were also considered. Alternatives evaluated as part of the ABCA are listed below:

To address ACM at the Site:

- Alternative #1: No Action
- Alternative #2: Asbestos abatement of Building A and RACM demolition of Buildings B1, B2, C1, C2, and C3.
- Alternative #3: Asbestos abatement of Buildings A, B2, C2, C3, and a portion of Building C1. RACM demolition of Building B1 and the portion of Building C1 immediately adjacent to Building A. **Note: this alternative must be used in conjunction with SHPO/Section 106 Alternative #3.**

To address mold at the Site:

- Alternative #1: No Action
- Alternative #2: Remediation of mold by removing non-historic, mold-damaged materials to be disturbed in conjunction with asbestos abatement in Building A.
- Alternative #3: Remediation of all mold in Building A, including mold on non-porous materials including, but not limited to, concrete, plaster, metal, and brick.

To address LBP at the Site:

- Alternative #1: No Action
- Alternative #2: Assume all paint disturbed during asbestos abatement of Building A is LBP and treat as such, short of full abatement.
- Alternative #3: Assume all paint in Building A is LBP and abate all painted surfaces.

To address the Section 106 review by SHPO for the Site:

- Alternative #1 – No Action
- Alternative #2 – Enter into a Memorandum of Agreement (MOA) with SHPO to mitigate adverse effects to the NRHP-eligible Site resulting from project activities using federal funds.
- Alternative #3 – Shore up and salvage structurally unsound buildings (Buildings B1, B2, C1, C2, and C3).

Phase 1a

Alternative #2 was selected to address ACM and the Section 106 review completed during Phase 1a. As this Phase consists only of demolition, mold and LBP are not addressed dur. This Decision Memorandum serves as approval for the use of ECIA Brownfields funding to facilitate Phase 1a of cleanup activities at the Site. As a part of this cleanup, air monitoring during asbestos abatement efforts will be conducted by Eocene. A Cleanup Report will be submitted to the City following successful completion of cleanup activities.

Phase 1b

Alternative #2 was selected for all contaminants of concern and the Section 106 review completed for Phase 1b. This Decision Memorandum serves as approval for the use of ECIA Brownfields funding to facilitate Phase 1b of cleanup activities at the Site. As a part of this cleanup, air monitoring during and after asbestos abatement efforts will be conducted by Eocene. The contracted Lead Safe Renovator will complete Post Renovation Cleaning Verification of residential and common areas, if renovated. A Cleanup Report will be submitted to the City following successful completion of cleanup activities.

2.3 Project Schedule

The project will be completed in two phases – each procured individually: Phase 1a and Phase 1b (see Table 1). The cleanup activity is to be funded by a combination of City funds and ECIA Brownfields grant loan funds.

Table 1 - Cleanup Funding Source, Activities & Schedule			
Phase	Funding Source	Activities	Completion Time
Phase 1a	City funds & ECIA Brownfield RLF loan	Separation of Building A from remainder of structures by RACM demolition of Building B1 and a portion of Building C1.	1-5 months, weather permitting
Phase 1b	City funds & ECIA Brownfield RLF loan	Asbestos abatement in Building A, except for roof parapet tar and ACMs considered historically relevant by Iowa SHPO. Remediation of non-historic, mold-damaged materials to be disturbed in Building A during asbestos abatement. Assume paint disturbed in Building A during asbestos abatement is LBP. Enter into a MOA with SHPO.	4-10 months pending EPA and Iowa SHPO concurrence

2.4 Estimated Cost

The total estimated cost of the remediation activities and associated reporting is \$710,000.

Table 2 - Estimated Cost of Selected Alternatives: Phases 1a and 1b	
Cleanup Items	Cost
ACM	\$841,000
Mold	\$20,000
LBP	\$60,000
SHPO/Section 106	\$104,500
Total:	\$1,025,500

2.5 Public Meeting

A public comment period regarding the ABCA and Asbestos Containing Material, Mold Remediation, and Lead-Based Paint Cleanup Plan for the Site was initiated by a September 5, 2024 public meeting. Submitted comments were to be addressed in the final ABCA and Cleanup Plan documents. This Decision Memorandum and all public comments are to be documented in the project repository for public review.

3.0 DECISION TO PROCEED

After consideration of information provided in this Decision Memorandum and relevant public comments, the City has decided to proceed with the federally funded eligible cleanup activities at the Site. Phase 1a and Phase 1b will be procured individually.

APPENDIX A

Figures

Figure 1 - Site Vicinity Map

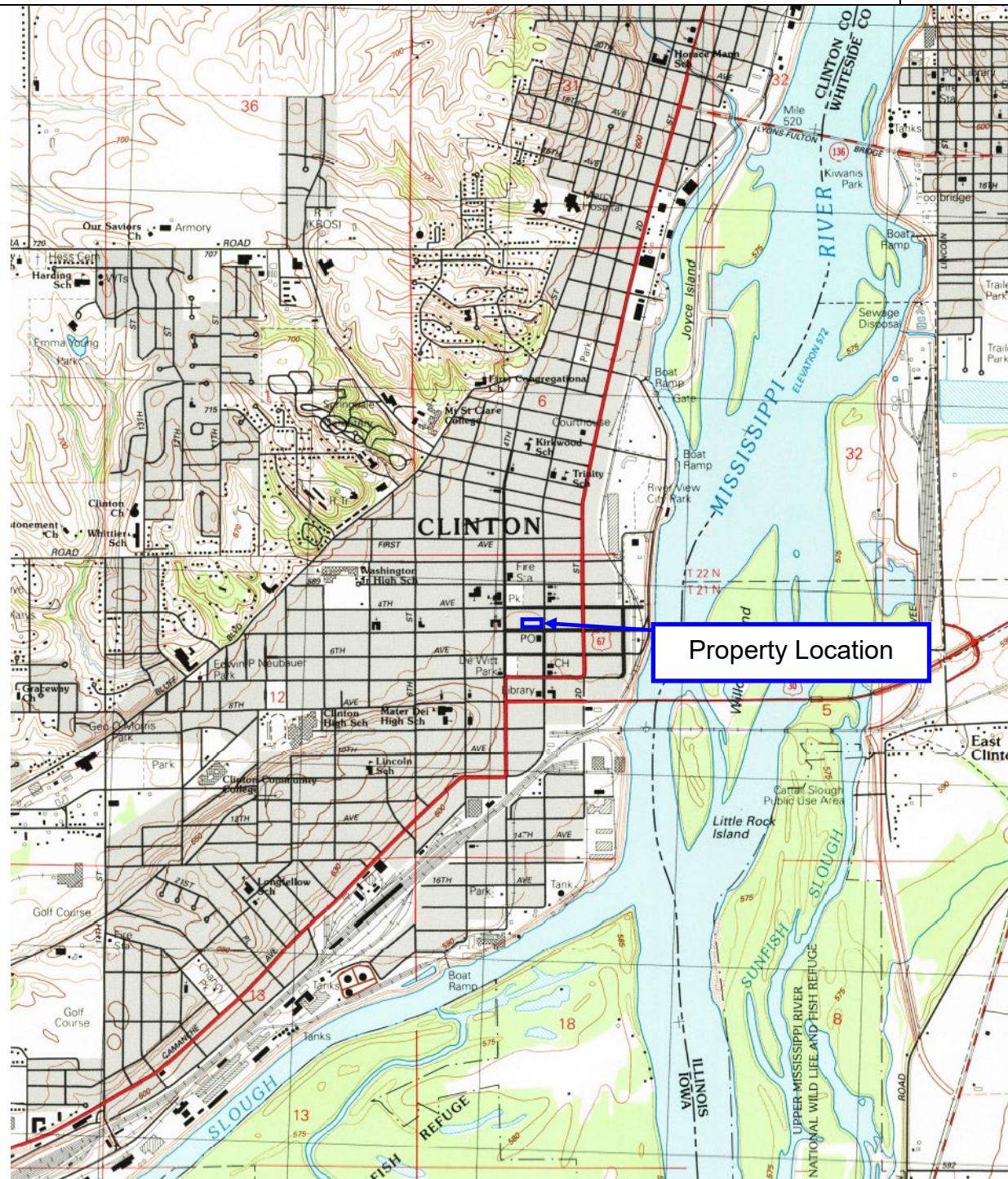
Figure 2 - Site Location Map

Figure 3 - Structure Identification Map

FIGURE 1 - SITE VICINITY MAP



North



Site Vicinity Map

City of Clinton / ECIA

Former YMCA – 480 South 3rd Street
Clinton, Iowa 52732

FIGURE 2 - SITE LOCATION MAP



Site Location Map

City of Clinton / ECIA

Former YMCA – 480 South 3rd Street
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FIGURE 3 - STRUCTURE IDENTIFICATION MAP



Structure Identification Map

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