

III. NARRATIVE

1. Community Need [15 points]

a. Health, Welfare, and Environment [8 points].

There is a pressing community need for federal support for cleanup of the Auto Salvage Yard brownfield in the City of Kelso, Washington. Kelso is a small town located in an economically challenges part of southwest Washington. Historically, Kelso has been a lumber mill and fishing town, but with the long decline of the timber industry and fisheries, the local economy has struggled. In recent years, unemployment has risen to over 10%. The median household income of \$42,000 is well below the state and national averages.

The economic challenges have had broad implications for the community as can be seen in the aging housing stock and declining share of home ownership. Over 87% of the housing units in Kelso were built before 1980. Many of these houses are not being maintained and are falling into blighted condition. The weak economy has driven much of the housing stock into rental units as ownership becomes beyond the grasp of many residents. Only 47% of housing is owner occupied in the City of Kelso, compared to 65% in Cowlitz County.

The industrial history of Kelso has left a legacy of contaminated sites in the community. These sites include bulk fuel facilities, lumber and paper mills, and small sites such as former gas stations. The 14 reported sites in the Washington State Department of Ecology database of confirmed and suspected contaminated sites database have a large impact in this small city. In addition, the adjacent larger community of Longview (population 36,648) has 49 reported contaminated sites.

	Reported Contaminated Sites	Density of Sites Per Mile	People per Site
City of Kelso	14 sites	1.73 sites per square mile	852
City of Longview	49 sites	3.48 sites per square mile	748
Cowlitz County	85 sites	0.07 sites per square mile	1,204
Washington State	4,394	0.06 sites per square mile	1,530

¹ Data is from the Washington State Department of Ecology Confirmed or Suspected Cleanup Sites list located at <http://www.ecy.wa.gov/database.html>, sourced September 29, 2012.

The Auto Salvage Yard brownfield represents one property in particular that has significant impact on community health, welfare and the environment. The Auto Salvage Yard is

located along in a residential neighborhood, immediately adjacent to three single family homes and across the street from an apartment complex. The site was used as an auto salvage yard as early as the 1950s, and operations left the property in a degraded condition with towering stockpiles of approximately 8,000 old tires, scrap cars, and automotive parts. Neighbors have formally complained to the Washington State Department of Ecology and the County Health Department about contamination of adjacent properties from waste oil runoff and hazardous materials from the Auto Salvage Yard since 1990. The Department of Ecology conducted investigations of the site and sent multiple notifications to the property owner of violations. The state conducted a Site Hazard Assessment of the property in 2004. The assessments resulted in a hazard ranking of 2 (with 1 as the highest risk and 5 the lowest risk). The property was subsequently listed on the state's Confirmed and Suspected Contaminated Sites list. With the increasing threat of enforcement actions, operations at the property ceased by 2004 and the owner abandoned the property.

Acting to protect the public from an imminent health threat, the City cleared the property in 2010, removing the waste automobile parts and demolishing the former garage building. The site is currently vacant and above ground hazardous materials have been properly disposed of, but petroleum and metals contamination remains in shallow, sub-surface soils. The property's elevated hazard ranking and proximity to residential homes continues to pose a public health concern. If left unmitigated, neighboring residents will continue to be subject to the exposure of harmful contaminants, neighboring property values will suffer, and the site will remain an eyesore to the adjacent community.

b. Financial Need [7 points]

The City of Kelso was founded on the timber business in the 1920s and continues to depend largely on the lumber industry today for economic vitality and resident income. However, a decline in demand for lumber and wood products has meant the closure of several of the region's lumber mills, which are crucial to Kelso's economy. Data from the U.S. Census Bureau demonstrates the negative impacts that this decline has had on Kelso employment, median household income, and home ownership, compared to the state and national averages.

	City of Kelso	Cowlitz County	State of Washington	National
Population: ¹	11,925	102,410	6,724,540	308,745,538
Unemployment: ²	10.8% Longview Metropolitan Statistical Area		8.6%	8.1%
Poverty Rate:	23.5% ³	16.9% ³	12.1% ³	15.9% ⁴
Percent Minority:	19.0% ⁵	14.7% ⁵	27.5% ⁵	26.7% ¹
Median Household Income:	\$36,008 ⁶	\$45,877 ⁶	\$57,244 ⁶	\$50,502 ⁴
Other				
Owner-Occupied Housing: ¹	47.7%	65.8%	64.8%	66.6%

¹ Data is from the 2010 U.S. Census data and is available at <http://www.census.gov/>
² Data is from the Bureau of Labor Statistics and is available at www.bls.gov/; sourced September 24, 2012
³ Data is from the 2011 American Community Survey, “Persons below poverty level,” sourced September 24, 2012
⁴ Data is from the 2011 American Community Survey and is available at http://www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html
⁵ Data is from the 2010 U.S. Census data and is available at <http://www.census.gov/>; Figure was calculated as total population minus “white persons not Hispanic,” sourced September 24, 2012
⁶ Data is from the 2011 American Community Survey, Sourced September 24, 2012

The “Great Recession” has exacerbated the economic strains on the City of Kelso. To balance the municipal budget, the City was forced to enact nearly 20% cuts across all departments in 2011 and has had to draw down emergency reserve funds continue to cover continuing budget shortfalls in 2012. But for support from state and federal grant funds, the City would not be able to move this important brownfield project forward.

2. Project Description and Feasibility of Success [50 points]

a. Project Description [10 points]

The City of Kelso has taken a leadership role in addressing the public health and community concerns regarding the Auto Salvage Yard brownfield including securing ownership of the

property, stabilizing the site, and creating an integrated plan to cleanup and redevelop the property.

The City of Kelso is working with partners in regional government and the non-profit sector to reduce homelessness and provide affordable housing in the community. The Cowlitz-Wahkiakum Council of Governments has adopted a regional housing plan and worked with the Cities of Kelso and Longview to develop a Consolidated Housing and Community Development Plan. The City of Kelso has identified the Auto Salvage Yard brownfield as an opportunity to meet needs for affordable housing in the community. The former industrial use is not compatible with the surrounding residential neighborhood. The City has established a strong partnership with the Lower Columbia Community Action Program (CAP) to redevelop the brownfield property as a cottage-style affordable housing community. The cottage housing model creates a cluster of small, single family homes around a shared green space. This model is an attractive alternative to typical multi-family apartment complexes that provides multiple advantages including: promoting home ownership and providing a high density of housing units in a design that is compatible with adjacent single family homes. Before this redevelopment vision can be implemented, the Auto Salvage Yard property must be cleaned up.

Environmental Concerns

With support from an Integrated Planning Grant from the Washington State Department of Ecology, the City of Kelso has conducted a Phase I and Phase II Environmental Site Assessment and Analysis of Brownfield Cleanup Alternatives. The environmental site assessment was conducted in two stages to initially characterize the property and then to refine the understanding of the extent of contamination. This two stage investigation process has created a robust dataset and strong understanding of conditions on the site. In total, 70 soil samples were analyzed from 22 locations and 10 groundwater samples were analyzed from four borings and three permanent monitoring wells. The environmental investigation was coordinated with a geotechnical investigation, natural resource survey, and a cultural and historical resource study of the property.

The site assessment found that the historical operations on the site have left widespread contamination in shallow soil, but no exceedances of cleanup levels in groundwater. The areas of highest concentrations have been delineated horizontally and vertically and align with location of the most intensive historic activities on the site.

Soil impacts

- Generally limited to shallow soils (0-2 feet below ground surface) with deeper impacts (4-6 feet below ground surface) in two distinct locations.
- Chemicals of concern: Petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAH), benzene, PCB, lead and cadmium.

Groundwater Impacts

- No exceedances of state cleanup levels in groundwater were observed in either shallow or deep groundwater samples collected from monitoring wells.

Current Condition of Property

The City of Kelso has taken proactive actions to stabilize the Auto Salvage Yard and control hazardous materials releases. In 2010, the City cleared the property, demolishing the former garage building and hauling off and properly disposing of auto parts, waste and hazardous materials. This effort was supported by funds from the US Housing and Urban Development Department Neighborhood Stabilization Program. In its current condition, the site is an empty lot. The ground surface consists of dirt with little vegetation and only a few trees and shrubs, which are primarily located along the perimeter of the property.

In 2012, the City initiated the foreclosure process on the property for unpaid property taxes. The City paid X dollars at the auction for the property in March 2012 to secure a Sheriff's deed to the property.

Property Reuse Plans

In keeping with its commitment to public welfare and community development, the City of Kelso is planning to put the Former Auto Salvage Yard brownfield property back into productive use by redeveloping the site into 8-10 units of cottage, style single family affordable housing units. The vision is the result of an affording housing study conducted the City and their partner, the Lower Columbia CAP. The affordable housing study found that wait lists for rent restricted housing for both Kelso Housing Authority and the adjacent Longview Housing Authority are both because high demand has driven the waiting period to over 2 years.

The City of Kelso and Lower Columbia CAP are both interested in developing affordable housing that promotes ownership. Cottage style housing has proven to be a successful model in other areas for building attractive and affordable single family housing that puts ownership within reach of low income residents. Modeled after housing from the first half of the twentieth century, cottage projects are collections of small homes organized together on a single site. The site and landscape design are carefully laid out to provide common amenities and privacy. Each cottage has its independence but still engages the other homes in their immediate community. The essential elements of a house are conserved within the smaller structures. Cottage housing projects may achieve greater levels of affordability through lower costs. Since the density is greater than conventional single family development patterns, the land cost per unit is lower. Also, by building smaller structures the cost per square foot results in a lower total cost. On-going maintenance costs of each home are also lessened by virtue of the smaller areas to heat and repair along with shared groundskeeping of common open space.

The proposed redevelopment plan for the Auto Salvage brownfield property includes 8 – 10 single family dwellings between 800 and 1,400 square feet, oriented around shared green space. Stormwater on the site will be managed with low impact development techniques including rain gardens. The City is considering adopting a special zoning ordinance to

support this type of development by reducing required parking spaces per unit and providing flexibility in building setback.

Lower Columbia CAP will use its experience to lead the redevelopment project. The organization has successfully developed over 400 units of affordable housing. Many of their projects have used sweat equity of residents helping to construct their own home to reduce down payment requirements and make housing affordable. This financial model will likely be used for redevelopment of the brownfield property.

Cleanup Plan

The City of Kelso has developed two cleanup alternatives for the property that align with the reuse vision for affordable housing. The cleanup alternatives are summarized below and described in detail in the attached Focused Site Assessment report.

1. Full Excavation—Areas with concentrations of contaminants above state cleanup levels in soil will be excavated and disposed of in an appropriate landfill. Additionally, the entire property will be scraped to a depth of approximately one foot to remove metal and glass debris that remains on the site and address concerns of contamination beyond delineated areas.
2. Targeted Excavation and Capping—Soil with elevated concentrations of benzene, which can cause an indoor air hazard, will be excavated and disposed of off-site. Other areas with contaminants above cleanup levels will be excavated and consolidated in an existing depression on the property (where the garage building formerly stood). The entire site will be capped with clean fill or building or paving as a barrier to contact with the soil.

The preliminary cost estimates for these cleanup options are approximately \$288,000 and \$617,000 for alternative 1 and 2, respectively.

b. Budget for EPA Funding, Tracking and Measuring Progress, and Leveraging Other Resources [20 points]

i. Budget

The project budget is based on the cleanup cost estimate for alternative 1—full excavation, developed in the Focused Site Assessment Report. The budget focuses the use of EPA brownfield cleanup funds on contractual services for a project engineer and licensed environmental remediation contractor to complete the cleanup project. The funds will be applied as described in the following tasks and budget table

Task 1—Community Involvement

The objective of this task is to keep the community informed of the project and engage them in the cleanup process. The City of Kelso reach out to the community through public meetings, informational fliers, and a project website.

Task 2—Cleanup Plan

The objective of this task is to prepare detailed engineering plans and specifications for implementing the cleanup This will involve preparation of a Remedial Action Plan for review by the

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WORKING DRAFT

Washington State Department of Ecology along with detailed plans and specifications for the public bid process and construction. This task will also include permitting for the cleanup project. It is anticipated that only local land use permits for filling and grading will be required, along with associated environmental review under the Washington State Environmental Policy Act. The design, permitting, and public bid process will require involvement of both City staff and the project consultant engineer.

Task 3—Cleanup Implementation

This task involves the physical excavation, backfilling, and grading activities of the cleanup action. The excavation work will be conducted by a licensed contractor selected through public bid process. The work will be overseen by an environmental engineer to ensure the project meets design plans and specifications and to collect confirmation samples to assess the effectiveness of the cleanup action.

Task 4—Reporting

This task includes closeout reporting for both the EPA brownfield cleanup grant and for the Washington State Department of Ecology. The completion report for the cleanup action will provide the state with the basis for issuing a No Further Action letter to memorialize that the project was completed in compliance with the cleanup laws and regulations.

Budget Categories	Project Tasks				
	Task 1 Community Involvement	Task 2 Cleanup Plan	Task 3 Cleanup Implementation	Task 4	Total
(programmatic costs only)					
Personnel	\$2,500	\$2,500	\$2,500	\$2,000	\$9,500
Fringe Benefits					\$0
Travel ¹ (EPA /state conference)	\$500				\$500
Equipment ²					
Supplies					
Contractual ³	\$2,500	\$5,000	\$180,000	\$2,500	\$190,000
Other _____					
Total	\$5,500	\$7,500	\$182,500	\$4,500	\$200,000
Cost Share ⁴	\$0	\$40,500	\$372,900	\$9,200	\$422,600

¹ Travel to brownfields-related training conferences is an acceptable use of these grant funds.

² EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies.

³ Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48.

⁴ Applicants must include the cost share in the budget even if applying for a cost share waiver. If the applicant is successful and the cost share waiver is approved, it will be removed in preaward negotiations.

ii. Tracking and Measuring Progress.

The cleanup project includes district milestones to track progress. These include the following.

Task	Methods of Tracking and Measuring Progress
1 Community Involvement	Recording and reporting community outreach elements (such as fliers and updates to project website) Reporting on community meeting
2 Cleanup Plan	Deliverables—Remedial Design, Permits, Plan Set and Specifications Measures—Set dates for deliverables, document achievement of deadlines, and provide EPA with copies of deliverables
3 Cleanup Implementation	Deliverables—Completion of cleanup action Measures—Set construction schedule, weekly updates on construction progress, tracking landfill tickets to measure weight of soil removed, confirmation samples of sidewalls and bottom of excavation to evaluate achievement of cleanup standards
4 Reporting	Deliverables—Completion report Measures—Set deadline for deliverable, provide copy of deliverable to EPA

iii. Leveraging

The City of Kelso has developed a funding plan that will leverage EPA cleanup funds at up to a 2:1 match. The City will use funds that have been awarded through a state Integrated Planning Grant to prepare the Remedial Design Plan, an estimated value of \$25,000. These grant funds have already been awarded and are ‘cash in hand’ that represent a 12.5% cost share of the requested \$200,000 EPA brownfield cleanup grant.

The City will also apply to the Washington State Department of Ecology for remaining grant funds needed to complete the cleanup action. The value of the state grant will be from \$63,000 to \$392,000 depending on the cleanup alternative selected for the site. The combination of the cash in hand and this future grant represents 30-200% match of the EPA brownfield cleanup grant.

Washington State has a dedicated fund to support cleanup of contaminated properties. Revenues for the fund derive from an *ad valorem* fee of \$7 per \$1,000 of the wholesale value of hazardous materials, including petroleum, that come into the state. This revenue stream has provided over \$100 million per year to the dedicated cleanup fund in recent years so is

considered a robust and reliable funding source. With the investment the state has already made in this project, the prospects of receiving a grant to support cleanup is considered high.

c. Programmatic Capability and Past Performance [20 points]

The City of Kelso has proven its ability to effectively manage grant funds and programming through both the HUD and Washington Department of Ecology grant programs opportunities previously mentioned.

Describe the management system you will have in place to direct activities under the grant. Include a description of your project manager and staff and a discussion of their expertise, qualifications, and experience. Discuss the means you will use to retain project leadership or recruit qualified staff should employee turnover occur. Describe the system(s) you have in place to acquire additional expertise and resources required to perform the proposed project. If you intend to contract for the necessary expertise, describe the system you have in place to acquire that expertise. [12 points]

The City will solicit outside contracting support implementation this project. The environmental and planning firm of Maul Foster & Alongi, Inc. (MFA) has worked with the City to conduct the site assessment, analysis of brownfield cleanup alternatives, and the redevelopment plan for the site. MFA is one of the leading environmental consulting firms in the Pacific Northwest and has a successful track record of completing brownfield cleanup projects funded with EPA and state grants on schedule and on budget. MFA has extensive technical knowledge of site remediation under both federal and Washington State guidelines. MFA is currently preparing the design and bid documents for the remedial action. The City may choose to continue to contract with MFA to provide construction oversight. Contractor services for implementing the cleanup action will be solicited through public bid process following state and federal guidelines.

ii. Adverse Audits (2 points)

Describe any adverse audit findings associated with a state or federal grant. If you have had problems with the administration of any grants (e.g., compliance reporting, expenditure of funds, etc.), please describe how you have corrected, or are correcting, the problems. Or, please affirm that you have not had any adverse audit findings. Respond to this criterion regardless of whether or not you have had a federal or non-federal assistance agreement. [2 points]

iii. Past Performance (6 points)

The City of Kelso has never received an EPA Brownfield Cleanup Grant but has successfully been awarded other federal and state grants.

Identify current and/or prior federally and non-federally funded assistance agreements received. Please provide information on no more than five of your most recent assistance agreements. Describe your history of successfully managing these agreements and performing the agreements including meeting and complying with reporting requirements, submitting final acceptable technical reports, and reporting on whether you were

*making progress towards achieving the results under those agreements and if not whether you explained why.
[6 points]*

3. Community Engagement and Partnerships [15 points]

a. Plan for involving affected community [5 points]

Since community members have lived with the nuisance and impacts of the former Auto Salvage Yard for years, the City of Kent has actively engaged them in the process of remediating the property. Comments from neighbors elevated the property to a priority to address in the Neighborhood Stabilization Program grant effort that led to clearing of the site. Fact sheets were mailed to over 100 surrounding residents prior to beginning the on-site environmental investigation. The Community Development Department has collected and responded to phone calls and comments from the community as the project has progressed through the assessment process. A community open house meeting was held on October 18 to share findings of the environmental assessment and solicit input on cleanup alternatives and redevelopment plans for the property. *The meeting was attended by X number of people [to be completed after meeting].*

As the project progresses to cleanup, fact sheets will be sent to neighbors to keep them updated and the City will maintain a project website where community members can obtain information and contact the Community Development Department to share any comments, questions, or concerns. Another community open house meeting may be held before the cleanup begins to inform neighbors about the construction process, including measures to be taken to control dust and keep the public safe during the earth work.

b. Current efforts and/or plans to develop partnerships [5 points]

The City of Kelso is building partnerships with public agencies and community-based organizations to develop the capacity to successfully complete this project.

- Washington State Department of Commerce—Provided funding and technical support to clear the property and demolish the former garage building. City and Commerce are continuing to explore funding opportunities to support redevelopment of the Auto Salvage brownfield property.
- Washington State Department of Ecology—Supporting the City with funding to conduct site assessment, analysis of brownfield cleanup alternatives, and redevelopment plan for the property. Ecology is also providing technical review of the environmental work on the site. The City plans to enter the state Voluntary Cleanup Program by the end of the year. Ecology staff are supporting the City in obtaining state funding to match the EPA brownfield cleanup grant.
- Cowlitz County Council of Governments—The Council of Governments developed a regional housing plan that provides the basis for the affordable housing programming assessment conducted on the Auto Salvage Yard brownfield. The City

is coordinating with the Council of Governments for technical support and assistance with a funding strategy to support redevelopment of the property

- Cowlitz County Public Health Department—The Health Department has played a key role in responding to public health concerns with the brownfield property in the past and continues to provide technical assistance in developing a cleanup plan for the property.

c. Description of the key community-based organizations involve in project [5 points]

The City is prepared to take the lead in addressing the environmental concerns on the property, and has developed a strong partnership with, Lower Columbia Community Action Program (CAP), a local non-profit organization to lead the affordable housing redevelopment project. Lower Columbia CAP has provided affordable housing and social programs to southwest Washington residents since 1964. They have successfully developed over 400 units of affordable housing. Lower Columbia CAP staff have been equal partners with the City in guiding the direction of redevelopment plans and have provided technical review and analysis of planning documents for the property. They have reviewed preliminary site plans and guided development of housing funding strategies for the site. Current plans for redevelopment of the Auto Salvage Yard include the City giving Lower Columbia CAP title to the property after the site is remediated and a No Further Action letter is received from the Department of Ecology. Lower Columbia CAP will manage construction of affordable housing on the property and maintain ownership of the land while the residences are leased or sold to occupants.

Letters of support from these partner organizations are provided in Appendix III.

4. Project Benefits [20 points]

Redevelopment of the Former Auto Salvage Yard will yield numerous public benefits. First and foremost, cleanup of the property will result in benefits to the natural environment and reduce the exposure of harmful contaminants to nearby residents. Cleanup and redevelopment of the property aligns with EPA's Strategic Plan and Livability Principles. The project supports existing neighborhoods as an infill project that improves the quality of life and public health in a residential area. It also capitalizes on public investment in existing infrastructure. The project leverages federal resources with state funds to support cleanup. This project has added significance as an equitable development because it benefits low income communities by providing affordable housing.

One of the most significant benefits of the project will be its ability to promote home ownership and offer affordable housing options to local residents. The share of owner-occupied housing units is currently eighteen percentage points higher than owner-occupied housing county-wide (47.7% owner occupied housing in Kelso versus 65.8% County-wide according to the 2010 U.S. Census). Housing stock in the City of Kelso is also older than housing stock county-wide. According to the American Community Survey, 87.5% of occupied housing units in Kelso built before 1980.

Home ownership is a basic building block of financial equity and a higher quality of life. A healthy rate of home ownership is not only a positive, economic indicator, but represents neighborhood stability, personal investment in community, greater civic pride, and strong neighbor to neighbor relationships. Home ownership also allows residents to reallocate personal income into long-term assets and financial savings opportunities.

Renting can also be more expensive on a monthly basis. According to the Cowlitz Regional Housing Plan, renters spend more of their income on housing costs than homeowners. Approximately 40% of renters are considered 'rent-burdened,' meaning they spend over 30% of their income on housing. Senior citizens are among some of the most disadvantaged. As much as 50% of Cowlitz County seniors, or approximately 2,400 seniors, spend over 30% of their income on rent.

Construction of the housing development will return the vacant property to an active, productive use and bring renewed vitality to the neighborhood. This new infill will maximize efficient use of already existing infrastructure and public facilities, including water and sewer lines, recent street and sidewalk improvements on the adjacent Pacific Avenue, and the site's proximity to both Huntington Middle and Barnes Elementary School. The site is accessible by public transportation via Kelso's 20 and 21 bus routes, and is located approximately 0.2 miles from the nearest bus stop.

To integrate environmental stewardship into the design of the redevelopment project, the proposed development will employ various sustainability features and principles of Low Impact Development (LID). The compact cottage houses will be constructed with energy efficient design and materials to keep heating and cooling costs affordable and to minimize energy consumption. The site plan incorporates LID stormwater management facilities to promote infiltration of rainwater. Runoff from parking areas that can potentially generate contaminants will be treated through StormFilter catch basins or rain gardens.

The City of Kelso plans to leverage its skilled labor force for construction activities associated with the project. Program administrators will make efforts to hire local contractors and plan to advertise contracting opportunities through local venues and community groups.

The EPA Cleanup Grant represents an important opportunity for the City of Kelso to continue its mission in remediating blighted and contaminated properties to restore the natural environment, mitigate risks to public health, utilize existing infrastructure, promote home ownership, and increase affordable housing options. The acquisitions of these funds are essential to furthering site improvements and satisfying the community vision.

APPENDIX I

THRESHOLD DOCUMENTATION



APPENDIX II

LETTER FROM THE STATE



APPENDIX III

LETTERS OF SUPPORT



APPENDIX III

DOCUMENTATION OF COMMUNITY NOTIFICATION



APPENDIX V

ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES



APPENDIX VI

DOCUMENTATION OF NON-PROFIT STATUS

NOT APPLICABLE



APPENDIX VII

DOCUMENTATION OF ELIGIBILITY



APPENDIX VIII

CONCEPT PLAN IMAGES



APPENDIX IX

FIGURE OF REPORT
CONTAMINATED SITES

