NARRATIVE INFORMATION SHEET: HARLOWTON ROUNthouse AND RAILYARD CLEANUP

1. Applicant Identification:
   City of Harlowton
   17 Central Ave S
   Harlowton, MT 59036

2. Funding Requested:
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested:
      i. $500,000
      ii. The City is not requesting a cost share waiver.

3. Location:
   City of Harlowton, Wheatland County, Montana

4. Property Information:
   Site Name: Harlowton Roundhouse and Railyard
   Address: 308 A Ave S, Harlowton, MT 59036
   Legal Description: S27, T08 N, R15 E, TRACT IN THE N2N2 - RAILROAD DEPOT

5. Contacts:
   a. Project Director: Bob Schuchard, Public Works Director,
      (406) 632-5523, harlopw@itstriangle.com, 17 Central Ave S, Harlowton, MT 59036
   b. Chief Executive/Highest Ranking Elected Official: Paul Otten, Mayor,
      (406) 632-5523, ctyharlo@itstriangle.com, 17 Central Ave S, Harlowton, MT 59036

6. Population:
   987 (U.S. Census Bureau Population Estimate 2019)
7. Other Factors Checklist

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>Page 1 &amp; 4</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or</td>
<td>NA</td>
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<td>United States territory.</td>
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<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td>NA</td>
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<tr>
<td>Secured firm leveraging commitment ties directly to the project and</td>
<td>Page 3; Narrative</td>
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<td>will facilitate completion of the project/reuse; secured resource is</td>
<td>Attachment 1</td>
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<td>identified in the Narrative and substantiated in the attached documentation.</td>
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<td>The proposed site(s) is adjacent to a body of water (i.e., the border of</td>
<td>Page 1, 2, 3 &amp; 5</td>
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<td>the proposed site(s) is contiguous or partially contiguous to the body of</td>
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<td>water, or would be contiguous or partially contiguous with a body of water</td>
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<td>but for a street, road, or other public thoroughfare separating them).</td>
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<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>Page 1 &amp; 2</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy</td>
<td>Page 3</td>
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<td>from wind, solar, or geothermal energy.</td>
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<td>The reuse of the proposed cleanup site(s) will incorporate energy</td>
<td>Page 3</td>
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<td>efficiency measures.</td>
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<tr>
<td>The target area(s) is located within a community in which a coal-fired</td>
<td>NA</td>
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<td>power plant has recently closed (2011 or later) or is closing.</td>
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</tbody>
</table>

NA = Not Applicable

8. Letter from the State Environmental Authority

Attached

9. Releasing Copies of Applications

Not applicable
November 18, 2021

Paul Otten, Mayor
City of Harlowton
17 Central Ave S
Harlowton, MT 59036

RE: Letter of Support: City of Harlowton’s Brownfields Cleanup Grant
Application for the Harlowton Roundhouse and Railyard

Dear Mr. Otten:

I am writing to express the Montana Department of Environmental Quality’s (DEQ’s) support of the City of Harlowton’s efforts to obtain a U.S. Environmental Protection Agency Brownfields Cleanup Grant.

I understand that the cleanup grant funds will be used to address hazardous substance and petroleum contamination at the historic Harlowton Roundhouse and Railyard in Harlowton, MT. DEQ understands that this funding is an essential component to the City’s effort to cleanup and redevelop the historic railyard.

DEQ supports Brownfields efforts in Montana, and wishes to promote assessment and cleanup activities that allow contaminated properties to be put into productive and beneficial use.

If you have any questions or comments about petroleum brownfield sites, please feel free to call Brandon Kingsbury at 406-444-6547 or email him at bkingsbury@mt.gov. If you have any questions or comments about hazardous substance brownfields sites, please contact Jason Seyler at (406) 444-6447 or jseyler@mt.gov.

Sincerely,

Jenny Chambers, Administrator
DEQ Waste Management & Remediation Division

cc: Jason Seyler, Brownfields Coordinator, Federal Facilities/Brownfields Section, jseyler@mt.gov
Brandon Kingsbury, Petroleum Brownfields Coordinator, Federal Facilities/Brownfields Section, bkingsbury@mt.gov
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a.i. Target Area and Brownfields:
Harlowton is a town of under 1,000 people in the center of Montana. Surrounded by farm and ranch lands, nestled among the Little Belt Mountains, the Crazy Mountains, and the Big Snowies, Harlowton, the target area for this grant, is an hour and a half drive to the nearest town of more than 10,000 people. For much of the 20th century Harlowton was a critical station on the Chicago, Milwaukee, St. Paul, and Pacific Railroad, where eastbound trains switched from electric power to diesel, and “the Milwaukee Road” was the town’s largest employer.

In 1979 the Milwaukee Road went bankrupt and the line was shuttered, with aftershocks that Harlowton is still feeling today. The town’s population has decreased by over 40% from its peak, and Brownfields, including the former Bob’s Chevron, the abandoned historic Graves Hotel, and the burned out Beigel’s Bar next to City Hall, litter Harlowton’s Main Street. A decrepit housing inventory and a failing downtown discourage the establishment of new businesses, the attraction of younger families, and the retention of Harlowton’s youth. The median household income in Harlowton is $42,961 (2019), which is 36% lower than the national median household income. Harlowton residents struggle with a greater than 12% poverty level due to the lack of economic opportunities and financial barriers of starting new businesses in a disadvantaged rural community that desperately needs a service-based expansion to tap into Montana’s largest growing industry: tourism, leisure, and hospitality. Most importantly, the lack of clean public greenspaces a) affects the mental and physical welfare of Harlowton’s most vulnerable (the young and old) age groups, and b) eliminates Harlowton’s greatest amenity and economic advantage of recreational tourism and vacation industry; direct access to the beautiful open space and the Musselshell River, one of the last undammed, trout-filled, snowmelt-fed rivers in the nation.

When the Milwaukee Road went bankrupt, the town of Harlowton involuntarily received both an untapped asset and a liability; a 180-acre brownfield along the Musselshell River. The Milwaukee Road Historic District and Railyard (Railyard) includes the historic station, the historic roundhouse, and a 1.3-mile by 1/3-mile strip of land that separates the south edge of town and the banks of the Musselshell River. Hazardous materials and historic diesel contamination at this State Superfund site directly threaten community health, restrict community access to the Musselshell, and bar development opportunities both within and adjacent to the Railyard. The cleanup, redevelopment, and restoration of public access to this City-owned 180-acre open space would allow for the restoration and reuse of the historic Roundhouse and historic wetlands; provide miles of trails along the Musselshell River; allow the city to sell off 9 lots for the development of critical new workforce housing; and bring back tourism, investment, and families to our community.

1.a.ii. Description of the Brownfields Site(s) – The Railyard, listed on the National Register of Historic Places, separates the town of Harlowton from the Musselshell River. Milwaukee Road operated the site as a 180-acre active Railyard from 1900 to 1979 and included a depot, the 17,000 square foot historic Roundhouse, the 1,200 square foot Forman’s Office, switching yards, track, and repair/refueling operations. The site has remained underutilized and inaccessible /vacant/restricted access since the railroad shut down operations. A medium-priority State Superfund site, the Railyard has been extensively characterized and partially remediated. Since 2015, the Montana Department of Environmental Quality (DEQ) and Harlowton have collaborated in more than $2 million of cleanup of petroleum spills and soil contaminated with asbestos and heavy metals (e.g., lead, mercury). However, two principal issues remain: 1) approximately 5,000 cubic yards of petroleum-

1 https://datausa.io/profile/geo/harlowton-mt/demographics
contaminated soil and sediments sit in the Musselshell floodplain and astride planned greenspace, and 2) the need to remediate 23,700 ft² of asbestos and 8,000 ft² of lead-based paint (totaling $400,000) prevents adaptive reuse of the Roundhouse and ancillary structures. These issues of surficial contamination, deteriorating building materials, and fugitive dust require the City to restrict access to the entire railyard, thus eliminating the community’s access to the Musselshell River. Harlowton now seeks to unlock the door to full use and redevelopment of this 180-acre recreational asset by remediating impacted soils; abating hazardous building materials in redevelopable structures; and obtaining a no further action determination and delisting for the State Superfund site from DEQ.

1.b. Revitalization of the Target Area: 1.b.i. Reuse Strategy and Alignment with Revitalization Plans – Cleanup of the Harlowton Railyard will:

1. enable development and community access to a 180-acre riverside greenspace that has been off limits for a century,
2. enable the construction of 9 units of workforce housing,
3. enable reuse of historic structures as a new community and event center, and,
4. catalyze redevelopment of adjacent properties, including a proposed RV park, recreational river access, and amphitheater for live music.

Redevelopment of the Railyard is Harlowton’s greatest economic development priority, and the City has facilitated multiple ground-up planning efforts to ensure that the redevelopment of the former railyard aligns with community’s revitalization goals and land use plans. In 2017, the City completed a grant-funded, community-led revisioning for the most heavily-contaminated area within the railyard. The resulting U.S. Army Corps of Engineers and Department of Natural Resources and Conservation (DNRC) approved plan restores previously filled-in wetlands and helps protect the adjacent, federally-designated Musselshell River floodplain. The wetland restoration plan also creates a nature trail, which will provide public access to miles of once restricted Musselshell River shoreline.

Building on the success of the 2017 wetland/nature park plan, Harlowton completed the community-led 2021 Redevelopment Concept Plan, through an EPA $20,000 Small Technical Assistance Grant, for its entire 180-acre rail property. Over the course of three public meetings, the 2021 Concept Plan incorporated the community’s desire to expand upon the 2017 wetland/nature park restoration plan by increasing public access to miles of green space within the floodplain, attracting investment and tourism to their community through a historic railroad interpretive trail, a City owned amphitheater and RV park, and enabling the City to sell off 9 city lots, outside of the floodplain, for much needed workforce housing.

Finally, EPA Region 8 is currently leading two Land Revitalization Technical Assistance planning efforts to determine the financial viability and provide architectural renderings of the community’s redevelopment plans for the 17,000 square foot Roundhouse and adjacent Foreman’s Office into an event and learning center respectively. The Harlowton community, having been actively involved in the development of these plans, sees the conversion of the railyard from brownfield to premier greenspace and the cleanup of the Roundhouse as the community’s most important step in attracting new businesses, families, and investment into their struggling town.

1.b.ii. Outcomes and Benefits of Reuse Strategy – At heart, cleanup of the Railyard is about restoring the link between Harlowton and its river, which will have enormous environmental health and economic benefits for the community. The Harlowton Railyard cleanup will result in:

An increase in greenspace and recreational opportunities:
- Cleanup of the Railyard will allow public access to 180 acres of formerly-closed public lands and miles of once restricted Musselshell River shoreline. The redevelopment plans also include
historical railroad signage and interpretive trails within the proposed wetland/nature trail and will enable new access to about 30 acres of greenspace for every acre remediated.

• Reduce risk and aggravated health conditions in Harlown’t’s most sensitive populations and protect the Musselshell River and its ecosystems by removing the Railyard’s lead, mercury, petroleum, and asbestos contaminated soils and sediments.

• Strengthen the climate resiliency of Harlown’t’s disadvantaged community by protecting the lower income population living adjacent to the railyard by restoring natural flood mitigation efforts through wetland development.

New workforce housing:

• The City has identified 9 public lots of clean former rail property, abutting existing city infrastructure (sewer, water, electricity) and the proposed wetland/nature trail, that will be available for development of safe, modern, work-force housing.

Stimulation of economic development:

• Remediation of the historic Roundhouse and foreman’s office will enable redevelopment of these structures into an event and learning center; significantly increasing tourism and providing an additional revenue source for the community. The City anticipates incorporation of modern energy efficiency measures (e.g., LED lighting and ground source heat pumps) into redevelopment of these outdated structures.

• Walking-distance access to extensive trails along the Musselshell River would immediately become Harloft’n’s single most important amenity for residents and attractant for potential investors.

• Harlown’t anticipates development of an RV and camping facility adjacent to the new event center and river access which will bring in tourists and generate revenue.

• The excavation of a new oxbow, as part of the wetland restoration efforts, will result in an excess of clean overburden within the Railyard. The City will use this excess soil, and the Railyard’s Opportunity Zone status, to build community amphitheater for its annual Harlow Music Project concert series. This amphitheater will be within walking distance of the town and adjacent to the proposed RV facility.

• Restoration of the 180-acre Railyard is expected to result in increased property values of blighted structures and adjacent properties by as much as 12.8%.

1.c. Strategy for Leveraging Resources:

1.c.i. Resources Needed for Site Reuse –The City of Harlown’t and DEQ have partnered to secure $165,000 in outside planning assistance and $1.7 million in assessment and cleanup funding for the Harlown’t Railyard. Moving forward, Harlown’t anticipates additional leveraged funding including:

• The City has been awarded $125,000 in state funding to implement the 2017 wetland/nature park restoration plan, contingent on cleanup.

• The City will apply for a 2022 Montana Historic Preservation Grant ($500,000) to assist in the preservation of the last remaining Milwaukee Road Roundhouse in Montana. If awarded, this grant will repair the exterior walls, windows, doors, and provide a weather tight enclosure so the Roundhouse could be open to the public.

• The City and Harlown’t Railroad Depot Museum have had conversations with both the local Bair Family Foundation and Callant Family Foundation regarding the restoration of the historic Roundhouse and the adjacent wetland/trail system. Both foundations have a long history of providing grants to numerous Harlown’t Railroad Depot Museum projects. Upon completion of the Railyard cleanup, the City and Harlown’t Railroad Depot Museum are eligible for up to $70,000

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from these foundations to assist with the restoration of the Roundhouse and development of the wetland/trail system.

- The City will also attract private investors, looking to reinvest unrealized capital gains, through the combination of historic preservation tax credits and the site’s Opportunity Zone status.

1.c.ii. Use of Existing Infrastructure – The redevelopment of the 9 publicly owned lots into workforce housing will use existing infrastructure including adjacent power, sewer, water, storm drainage, road, and dry utilities. Specifically, 40-inch diameter concrete gravity sewer mains are located to the south of the proposed housing. These sewer mains were constructed between 1990 and 2000 and have ample capacity to support planned reuse. Within the last 6 years, a six-inch diameter PVC water main was installed and runs adjacent to the site, including 1 fire hydrant to provide fire protection. The proposed RV park and amphitheater will use existing power service. No utility or storm water infrastructure is needed for the wetland/nature park. 3rd Street SE and A Avenue SE provide adjacent road access, with additional pedestrian and bicycle access to the target area provided by the existing Smoking Boomer rails-to-trail. Should unanticipated reuse-related infrastructure improvements be necessary, funding through American Rescue Plan Act (ARPA) and USDA Rural Development could be used.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2. a. Community Need: 2.a.i. The Community’s Need for Funding – Harlowton is an impoverished town of less than 1,000 citizens embedded in a county (Wheatland) larger than Rhode Island but with fewer than 2,000 inhabitants. The residents of the City of Harlowton recognize their community is on the brink of dying (its population of 987 has experienced a 43% decrease since the 1960s). Harlowton meets the Justice40 definition as a disadvantaged community that has historically been marginalized and overburdened by pollution, underinvestment in housing, transportation, water and wastewater infrastructure, and health care. Median household income for Wheatland County, for which the target area, Harlowton, resides, is $40,164 (compared to US $61,845) and 19% of the total population is living below poverty. Within the target area, 26.7% of those under 18 are living below poverty and total unemployment was as high as 9.9% in 2021. Please keep in mind that social and economic data for the town of Harlowton is limited and often underrepresented because it is lumped together with multiple wealthy ranches within its 654-square-mile census tract.

The liability the multi-million dollar 180-acre contaminated Railyard represents to the community of Harlowton undermines social cohesion, economic stability, and property values, which in turn, reduces local tax revenues even further. With little to no income generated through sales tax and diminishing property values, the City has no room in its dwindling budgets for anything other than basic services. Asking each Harlowton resident to contribute $6,000 to fund the remaining cleanup for the site is infeasible and inequitable. This Brownfields Cleanup grant will provide critical funding and allow this disadvantaged community to address the final phase of cleanup at the historic Railyard.

2.a.ii. Threats to Sensitive Populations

2.a.ii. (1) Health or Welfare of Sensitive Populations: 26.7% of residents under 18 years living in the target area live below the national poverty level. This target area also has a higher percentage of single mother households living below poverty (6.4%) and residents without health insurance (14.4%) compared to the U.S. at 4.5% and 9.4%, respectively. Due to its central location within the target area, river access and proximity (less than 4 blocks) to Harlowton’s elementary and high schools, and

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3 2019 data from the National Environmental Public Health Tracking Network
4 2019 ACS 5-Year Estimates Data Profiles
5 U.S. Bureau of Labor Statistics
the impracticability of fencing off such a large property, the open spaces of the Railyard are a frequently-trespassed attractive nuisance for the children of Harlowton’s uninsured and low-income residents. The threat of exposure to these already at-risk populations are evident by the signs of continuous trespassing/recreating over the Railyard’s metals and asbestos impacted soils, and the frequently break-ins into the cavernous, yet highly contaminated, 17,000 square foot Roundhouse. In addition, 24.4% of target area residents are 65 or older living on reduced incomes; of those 15.1% live in poverty and 7% live by themselves (U.S. averages 1.4% and 3.6% respectively). This declining and aging community (EJScreen score of 80th percentile for populations over the age of 64) struggles to provide its low-income families and seniors with safe and adequate recreational amenities that would allow them to practice critical preventative exercise. Restoration of the Railyard will 1) remove contaminants; reduce children’s exposure to contamination and 2) allow safe access to over a mile of the Musselshell River shoreline. The redevelopment of the railyard will provide miles of free and safe walking and bike paths and much needed health/recreational outlets for the most disadvantaged of Harlowton’s residents.

2.a.ii. (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions - The contamination at the Harlowton Railyard is exacerbating the multiple sedentary-related health conditions plaguing the City. The following shows the percentage and most prevalent health conditions in the City’s adult population: high cholesterol (45.8%), high blood pressure (43.5%), obesity (26.4%), diabetes (12.3%), Chronic Lower Respiratory Disease (COPD) (12%), and asthma (9.3%). The City’s lack of public parks and deteriorating sidewalks in the target area is limiting mobility and making physical activity more dangerous. The contamination at the Railyard restricts access to 180 acres of prime City-owned open-space/riverfront property and discourages critical preventative exercise and lifestyle modifications. The cleanup of the Railyard will assist the City in providing cost-effective and proactive solutions to alleviate the City’s prevalent health conditions by (1) addressing the asbestos, petroleum, and heavy metals impacted soil, sediment, groundwater and surface water at the Railyard; (2) providing its residents with a new 180-acre open-space/health-fields; (3) encouraging physical activity by establishing miles of safe walking/biking trails and access to the Musselshell River; (4) providing 9 lower income households new and safe housing. The cleanup of the contaminated Railyard will be transformative for the environment, the physical and mental health of neighboring residents, and the future of this community.

2.a.ii. (3) Disproportionately Impacted Populations – The low-income youth and elderly within the target area (EPA EJScreen values of 69th percentile for low-income population and 78th percentile for population over 64) are disproportionally exposed to health impacts from the historic Railyard and substandard housing conditions prevalent in Harlowton. EPA’s EJScreen Environmental Justice Index illustrates that these sensitive populations in the target area are more at risk of exposure to lead paint, which exists in the depot, roundhouse, and other ancillary structures, than of 83% of US residents. Compounding these impacts is the lack of historic local governmental policies or planning efforts, which allowed these hazardous operations to be located adjacent to valuable community natural resources and residential areas. The absence of community planning efforts in the early 1900s, which permitted the siting of the Railyard between Harlowton’s southern neighborhood and the shoreline of a centrally-located recreational waterway, has dis-proportionally impacted underprivileged residents of Harlowton. These contaminated shorelines are an attractive nuisance and are frequently trespassed due to their central location, proximity to schools, and natural splendor. However, it is the underprivileged residents (especially children) who are more often exposed to the petroleum, asbestos, and heavy metal contamination in the soils, groundwater, and surface water as

6 Central Montana Health Assessment, 2017
they do not have the means to recreate away from the city center. This Cleanup grant will allow Harlowton a mechanism to promote environmental justice in the target area by providing these sensitive and at-risk populations with access to free and safe recreational open space.

2.b. Community Engagement

2.b.i. & 2.b.ii. Harlowton Railyard Cleanup Brownfields Partners and Roles – The City and DEQ’s Brownfields Program have been working with the community closely on the cleanup of the Railyard since 2015. Our efforts have included a wetland and Railyard concept plan stakeholder group; Snowy Mountain Economic Development Corporation (a regional Brownfields grantee); the historical rail museum; and state natural resource and funding expertise.

List of Key Montana Brownfields Project Partners:

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of contact</th>
<th>Specific role in the project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harlowton Depot Museum</td>
<td>Ken Major, Museum President, 406-632-4443 <a href="mailto:info@harlomilwdepot.org">info@harlomilwdepot.org</a></td>
<td>Providing input on historic Railroad building reuse and interpretive trails.</td>
</tr>
<tr>
<td>Harlowton Wetland Citizens Group</td>
<td>Lauri Teig, Community Organizer, 406-749-3899, <a href="mailto:lteig@live.com">lteig@live.com</a></td>
<td>Providing local input into wetland redevelopment plan</td>
</tr>
<tr>
<td>DEQ’s Brownfields Program</td>
<td>Jason Seyler, Brownfields Coordinator, 406-444-6447, <a href="mailto:jseyler@mt.gov">jseyler@mt.gov</a></td>
<td>DEQ Project manager with grant and environmental expertise</td>
</tr>
<tr>
<td>Snowy Mountain Development Corporation</td>
<td>Sara Hudson, Executive Director, 406-535-2591, <a href="mailto:info@snowymountaindevelopment.com">info@snowymountaindevelopment.com</a></td>
<td>Economic development organization and Harlowton Railyard Concept Plan funding partner.</td>
</tr>
<tr>
<td>Montana Dept. of Natural Resources &amp; Conservation</td>
<td>Heidi Anderson-Folnagy, Grant Manager, 406-444-6691, <a href="mailto:handersonfolnagy@mt.gov">handersonfolnagy@mt.gov</a></td>
<td>Provides grant funding and technical expertise</td>
</tr>
</tbody>
</table>

2.b.iii. Incorporating Community Input: The local community, business owners, project partners, and interested citizen groups have been heavily involved in cleanup and reuse planning of the historic Roundhouse and Railyard. On November 17, 2021, the City hosted an in-person and on-line public meeting to share and solicit feedback on the draft Cleanup Grant application to EPA and the draft Analysis of Brownfields Cleanup Alternatives (ABCA). This public meeting was one of many in a series of public meetings that started in March of 2019 for the development of the Railyard Concept Plan and will continue through February 2022 with EPA’s Land Revitalization Technical Assistance to provide redevelopment alternatives/visioning and a market study for the historic Roundhouse. To increase public accessibility, a Harlowton Railyard Transformation Project’s ArcGIS HUB community engagement webpage (https://harlowton-railyard-mtdeq.hub.arcgis.com/) was created to house the draft Cleanup Application, draft (ABCA, the Railyard Concept Plan, and EPA’s Roundhouse Market Study and redevelopment renderings.

Since cleanup started at the Railyard in 2015, DEQ and the City have hosted numerous open houses, city council updates, walking tours, and stakeholder visioning sessions, providing updates on environmental investigations and cleanup progress. Input received from the community was used to further refine reuse and restoration plans for the site. Moving forward with cleanup planning and implementation, the City will continue to solicit, incorporate, and respond to public feedback through robust community engagement, including (1) stakeholder and small group outreach (e.g., to the Harlowton Wetland Citizens Group); (2) at least two public meetings/open houses that can accommodate both social distancing and virtual/zoom meetings during the cleanup process; (3) posting preliminary design documents, recordings of public meetings, and public comment surveys on the Harlowton Railyard Transformation Project’s ArcGIS Hub web page; and (4) outreach to the local media and posting on the City’s social media accounts.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan
The Harlowton Railyard is currently enrolled in DEQ’s Voluntary Cleanup Program; contamination includes hazardous building materials in structures and petroleum impacted sediments and soils. The Brownfields grant will allow the City to hire licensed contractors to remediate/abate asbestos containing material and lead-based paint from the 17,000 square foot Roundhouse and excavate and dispose of 5,150 cubic yards of petroleum contaminated soils and sediments at the Railyard’s existing permitted landfarm (of which 2680 cubic yards will be addressed through a $104,486 DNRC grant that will serve as the project’s match). All tasks will be directed and overseen by DEQ’s Brownfields Program ensuring that the cleanup meets DEQ and EPA standards and are designed to result in a no further action letter from the DEQ’s Voluntary Cleanup Program. We anticipate completion of a Cooperative Agreement with EPA in September of 2022; DEQ will approve the abatement workplan in March 2023; bid specifications will be finalized and a contractor selected in May of 2023; asbestos and lead-based paint abatement will commence in June 2023 while soil excavation will occur in the fall, when the water table is at its lowest, followed by multiple groundwater monitoring events. Final reporting to DEQ’s Voluntary Cleanup program will occur in the spring of 2025 and a no further action letter expected by September 2025 (see Table 3).

Table 1. Harlowton Railyard and Roundhouse Implementation Schedule

<table>
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<tr>
<th>Task/Activity</th>
<th>2022 Q3</th>
<th>2022 Q4</th>
<th>2023 Q1</th>
<th>2023 Q2</th>
<th>2023 Q3</th>
<th>2023 Q4 – 2025 Q3</th>
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<tr>
<td>Community Engagement Milestones (Note: Project website updated routinely)</td>
<td>Grant Kick off meeting</td>
<td>Pre-abatement/cleanup meeting</td>
<td>Post-abatement/cleanup meeting</td>
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<td>EPA cooperative agreement, work plan, and ABCA finalized, Community Engagement</td>
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<td>Procure Qualified Environmental Professional (QEP); QEP prepares Roundhouse cleanup SOW and Bid Specs; DEQ review and approval of SOW; Procurement of cleanup/abatement contractor</td>
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<td>Building Materials Abatement</td>
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<td>Soil Cleanup &amp; Confirmation sampling</td>
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<td>Grant Closeout</td>
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3.b. Description of Tasks/Activities and Outputs:

Task/Activity: Community Engagement

i. Implementation
   - Conduct community meetings to inform and obtain public feedback on cleanup plans and implementation. Meetings will take place upon grant kickoff, prior to cleanup commencing, and post cleanup activities.
   - Update existing project web site and provide outreach via the City’s social media outlets.
   - Develop a Community Relation Plan and Administrative Record for the cleanup activity.

ii. Anticipated Project Schedule: Community meetings for planning and cleanup are ongoing (most recently November 17th) and the project’s web page is already live (https://harlowton-railyard-mtdeq.hub.arcgis.com/). Future meetings or webpage updates will occur throughout the project.

iii. Task/Activity Lead(s): The City will oversee this task with assistance/input from DEQ and QEP.

iv. Output(s): Three public meetings, small group outreach, the project website, on-site outreach, Community Relation Plan and Administrative Record.
Task/Activity: Cleanup Planning

i. Implementation
   • Based upon the numerous investigations at the Railyard and Roundhouse, the project’s QEP will finalize the ABCA and draft a cleanup plan for the abatement of the Roundhouse and the excavation of petroleum contaminated soils for DEQ’s review and approval.

ii. Anticipated Project Schedule: A DEQ approved cleanup plan and ABCA completed by March 2023.

iii. Task/Activity Lead(s): QEP and DEQ will cooperatively produce an approved ABCA and cleanup plan

iv. Output(s): A DEQ approved cleanup plan and a final ABCA.

Task/Activity: Building Materials Abatement and Contaminated Soils Cleanup

i. Implementation:
   • Supervised or completed by the QEP, a licensed abatement contractor will remove and properly dispose of over 23,700 ft² of asbestos and 8,000 ft² of lead-based paint from the Roundhouse.
   • Excavation of approximately 5,150 yd³ of petroleum contaminated soils and disposal at a Railyard’s existing permitted landfarm. (3,500 yd³ will be paid for by a DNRC as match)
   • Remedial activities will be documented in a DEQ approved Construction Completion Report.

ii. Anticipated Project Schedule:
   • Hazardous building materials will be abated by June 2023
   • Soil excavations completed by December 2023
   • Final DEQ approval of the Construction Completion Report in March 2024.

iii. Task/Activity Lead(s): The QEP, with input from DEQ, will ensure the hazardous building materials abatement and contaminated soils excavation will be completed to DEQ and EPA standards.

iv. Output(s):
   • QAPP and a Roundhouse asbestos and LBP clearance sampling and abatement report.
   • A DEQ approved Construction Completion Report summarizing cleanup activities.

Task/Activity: Project Management/Oversight

i. Implementation
   • The City will be responsible for oversight of the project and compliance with all state and federal requirements. Subtasks include procurement of a QEP and cleanup/abatement contractors consistent with federal regulations, quarterly reports, ACRES reporting, support for EPA Endangered Species Act and SHPO consultation, etc.

ii. Anticipated Project Schedule: September 2022 to September 2025

iii. Task/Activity Lead(s): The City will manage the grant and with assistance from QEP/DEQ will be responsible for all oversight and compliance of the cleanup activities.

iv. Output(s): Clear procurement records, quarterly reporting, ACRES reporting, and documentation of compliance with all Cooperative Agreement provisions.

3.c. Cost Estimates:

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### Contractual Costs

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<td><strong>Total Budget</strong></td>
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<td>$583,782</td>
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</tbody>
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*Includes QEP and Cleanup Contractor; There will be no Travel nor Indirect costs

### 3.c.i Cost Per Unit Breakdown:

#### Task 1: Community Engagement
Personnel costs – Community engagement activities for Mayor, City Clerk, and Public Works Director = 80 hours at $26.93/hr = $2,154; **Contractual** – Public meeting support from QEP = 36 hours at $122.09/hr = $4395.24 (all QEP wages derived from previous phases of excavation); **Supplies** - $100 printed materials such as posters and handouts

#### Task 2: Cleanup Planning
Contractual – Cleanup plan and final ABCA preparation by QEP = 90 hours at $96.32/hr = $8,668.80

#### Task 3: Building Materials Abatement and Soil Cleanup
Contractual – Finalize ABCA, Cleanup plan, QAPP, Asbestos/LBP abatement and soil excavation oversight, confirmation sampling, and construction completion reporting QEP = 164 hours at $96.32/hr = $15,796; Abatement subcontractor and direct expense costs for asbestos abatement are 335 linear ft at $48/ft = $16,080 and 34,562 ft² at $5.09/ft² = $176,073 and 8,000 ft² of lead-based paint abatement at $21.87/ft² = $174,983. Excavation subcontractor and direct expense costs for excavation/removal/disposal of 5,150 yds³ of petroleum contaminated soil at $39/ yds³ = $200,850 (of which $104,486 is match via a DNRC grant).

#### Task 4: Project Oversight
Personnel costs – Compliance with all federal and Cooperative Agreement Requirements for procurement of contractors, quarterly reports, ACRES reporting and annual grant reports by Mayor, City Clerk, and Public Works Director = 200 hours at $26.93/hr = $5,386.

### 3.d. Measuring Environmental Results
Upon notice of award, the Harlowton Railyard Cleanup project schedule will be updated with tasks, subtasks, milestones, and reporting requirements specific to the EPA grant terms and conditions, including the outputs associated with each task as detailed in Section 3.b. The tasks, schedule, and outputs will be reviewed by the City throughout the project upon receipt of the QEPs biweekly updates. The QEP and the City will identify project deviations promptly so that corrective measures can be developed and implemented to ensure the project stays on schedule, on budget, and outcomes are achieved in a timely manner. These project updates will be included with each quarterly progress report submitted to EPA as well as posted to the project website. By tracking the number of public meetings/community engagement opportunities, the quantity of contaminated soil and hazardous building material removed, the acres returned to public access, and the dollars of public and private funding leveraged, the City will ensure the project’s outcomes (reducing the environmental and public health risks in this disadvantaged community while opening up over 180-acres to redevelopment and restoring the historic Roundhouse and wetlands) are met. All outputs and outcomes completed during and after the three-year grant period will be reported and updated in ACRES.

### 4. Programmatic Capability & Past Performance

#### 4.a. Programmatic Capability: 4.a.i & 4.a.ii. Organizational Structure and Description of Key Staff
The City has the technical, administrative, financial systems, processes, and procedures in place to effectively manage this grant project as is demonstrated by their successful administration of other similar environmental grants. The City’s Public Works Director, Bob Schuchard, will oversee site cleanup activities and implementation of the Cleanup Grant. Mr. Schuchard will work closely with the Railyard team, which also includes Paul Otten (Mayor), Kathie Newland (City Clerk), and DEQ’s Brownfields coordinator Jason Seyler. The City has been collaborating with DEQ’s Brownfields Program at the Railyard since 2015 and has successfully managed $1.7 million in state assessment and cleanup grants during that time.

Bob Schuchard: Public Works Director, has served in the City’s Public Works Department for 15 years (1 of them as Director). He will be responsible for project management, community outreach, QEP oversight, and coordinating the City and DEQ’s remedial actions at the Railyard.

Paul Otten: City Mayor since 2017. During his time as Mayor, Mr. Otten has been responsible for ensuring the City is in compliance with numerous grant (both state and federal) Cooperative Agreement requirements. As Mayor, Mr. Otten will also focus on community outreach and ensure the public is kept informed of the cleanup project’s status.

Lara Brisco: Financial Grant Management. Ms. Brisco has been the City’s Clerk for 2 years and has over 7 years of administrative experience. She will manage all financial and reporting requirements.

Jason Seyler: DEQ’s Brownfields Coordinator since 2009, has assisted the City with numerous grant applications and management, as well as, overseeing the remedial and planning efforts at the Railyard. DEQ’s close involvement and oversight will ensure that the site is appropriately cleaned up in order to achieve a no further action determination from the DEQ.

4.a.iii Acquiring Additional Resources

The City will contract for any additionally-needed services or expertise utilizing its own procurement policy. The City’s policy is compliant with federal requirements. The City keeps a meticulous procurement record for all grants; documenting outreach, MBE/WBE good faith efforts, cost/price analysis, rationale for decision, etc. The City intends to procure and contract with a QEP to oversee technical aspects of the cleanup and to procure the remediation/abatement contractor.

4.b. Past Performance and Accomplishments

4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Assistance

4.b.ii.1. Purpose and Accomplishments – Since 2015, The City and the DEQ Brownfields Program have partnered to receive over $1.7 million in Montana DNRC reclamation and development and DEQ Orphan Share grants for assessment, cleanup, and restoration of the Railyard. The first DEQ Orphan Share Grant ($480,000) paid for the preparation of a work plan, bid specifications, and contracting for the excavation/disposal/treatment of over 8,500 cubic yards of petroleum contaminated soils from within the railyard. Two DNRC grants ($800,000 total) allowed the City to contract the preparation of a work plan, bid specifications, and contracting for the excavation/disposal/treatment of over 13,000 cubic yards of petroleum contaminated soils.

Outside of environmental cleanup, between 2016 and 2018, The City has received multiple U.S. Army Corps of Engineers Water Resource Development Act (EWRDA) grants (totaling $870,000), which successfully replace 17,500 linear feet of Harlowton’s aging water distribution system.

4.b.ii.2. Compliance with Grant Requirements – The City has consistently maintained compliance with all state and federal funding award terms and grant agreements, including following all appropriate procurement requirements, quarterly invoicing and progress reporting requirements, work plans approvals, meeting timelines, tracking budgets, reporting final project outcomes, and providing final reports with grant closeout documentation. All three of the above State and Federally funded projects have been completed on time and within budget.
Application for FY2022 EPA Brownfields Cleanup Grant:
Harlowton Roundhouse and Railyard Project
City of Harlowton

Threshold Criteria for Brownfields Cleanup Grants

1. **Applicant Eligibility:**
The City of Harlowton is an incorporated municipality in the state of Montana and is eligible for funding.

2. **Previously Awarded Cleanup Grants:**
No previously-awarded EPA Brownfields Cleanup Grant funding has been utilized at this Site.

3. **Site Ownership:**
The City purchased the property, acquiring fee simple ownership on May 21, 1985. The City will retain ownership throughout the period of the grant.

4. **Basic Site Information:**
   a) Site Name: Harlowton Roundhouse and Railyard
   b) Address: 308 A Ave S, Harlowton, MT 59036
      Legal Description: S27, T08 N, R15 E, TRACT IN THE N2N2 - RAILROAD DEPOT
   c) Current owner: City of Harlowton

5. **Status and History of Contamination at the Site Identify:**
   a) **Hazardous Substances or Petroleum**
      A wide variety of contaminants has been found at the Harlowton Roundhouse and Railyard site. The predominant contaminants found in the Roundhouse are hazardous building materials such as asbestos and lead based paint. The predominant contaminant in the Railyard is petroleum contamination in surface and subsurface soils, sediments, and free-product contamination floating on groundwater.
   
   b) **Operational History and Current Uses**
      The Chicago, Milwaukee, St. Paul, and Pacific Railroad Company’s Harlowton Milwaukee Roundhouse Facility operated as a railroad engine repair and fueling facility from 1900 to 1979. Site activities included maintenance, servicing, and classification of railroad equipment. During railroad operations, wastewater from the engine terminal was discharged into a retention/settling pond. This wastewater consisted predominantly of water used in the engine repair process, but also included cooling water, diesel overflows, boiler feed water, and water from the sanitary system that served 75 employees. The settling pond was located in the southeast portion of the Site adjacent to a slough that enters the Musselshell River.

      The petroleum contamination at the Site, according to the former railroad employees, likely resulted from diesel fuel spills and leakage from underground diesel piping. A 500,000-gallon, aboveground diesel storage tank was used at the roundhouse to supply fuel for the diesel-powered locomotives. Diesel was typically brought to the facility in railcars and
pumped into the tank via underground piping. The former employees explained that refueling diesel locomotives sometimes resulted in overfills when the refueling crew was distracted. Based on their description, a fair amount of diesel was spilled on the ground in the refueling area because the automatic shutoff dispensers did not always work. Additionally, a reported 6-inch diameter, underground diesel line leading from the pump house to the 500,000-gallon storage tank was found to be faulty and leaked diesel fuel into the subsurface each time a tanker car was offloaded through the pump house into the aboveground storage tank.

The diesel from these overfills and leaking fuel lines ultimately accumulated in the east settling pond water and reached thicknesses of 3 to 6 inches. When that occurred, railroad employees recalled lighting the hydrocarbons on fire to reduce the contaminant load. In 1970, an oil separator unit (System) was installed at the Site that collected the wastewater from the settling pond and removed any free product. Free product flowing into the System was collected by a belt skimmer and pumped into an aboveground storage tank. The System has a Montana Pollutant Discharge Elimination System (MPDES) permit from 1971 to the present. In 2012, the City of Harlowton received a notice that the effluent values exceeded the MPDES permit for total petroleum hydrocarbons (TPH). Since then, all effluent values have been below permitted levels. According to the Harlowton City engineer, the belt skimmer broke down in the fall of 2014 and has not operated since.

To the detriment of small communities across Montana, the Chicago, Milwaukee, St. Paul, and Pacific Railroad Company went bankrupt in 1980 and reorganized as CMC Heartland Partners. CMC Heartland Partners transferred the ownership of the site to the City of Harlowton in 1985. Shortly after, a group of Harlowton residents successfully petitioned for the Milwaukee Road Historic District to be listed in the National Register of Historic Places. Unfortunately, for Harlowton’s 987 residents, the thought of addressing the multimillion-dollar cleanup was beyond daunting. Due to the contamination found at the Railyard, the City has restricted public access to the Roundhouse and Railyard since 1985.

Since 2015, DEQ’s Brownfields program has partnered with the City to apply for and receive over $1,948,338 in Montana assessment and cleanup grants to investigate and remediate the 5-acre free-product petroleum plume which is bound by a residential neighborhood to the north and a wetland/tributary of the Musselshell River to the south. The historic roundhouse (last remaining Milwaukee Road roundhouse in Montana) has also been assessed through a Snowy Mountain Development Corporation EPA Brownfields Assessment Grant. This assessment uncovered approximately $366,000 worth of lead paint and asbestos within the historic rail structures (Roundhouse, Forman’s Shop, and Storage Shed). This resulted in all three rail structures being locked, with no further access, and all contents being deemed contaminated. With current cleanup cost for the Railyard’s petroleum, asbestos, and heavy metals contamination approaching $2.5 million, the Brownfields Cleanup grant is essential for the City to completely remediate/abate the 15,000 ft² Roundhouse and cleanup the remaining 6,500 cubic yards of petroleum contaminated Railyard soils.

c) Environmental Concerns
• Approximately $367,136 worth of lead paint and asbestos has been identified within the historic Roundhouse.
• Approximately 5,150 cubic yards of surface and subsurface/vadose-zone soils are contaminated with petroleum hydrocarbons within the Railyard.

d) Source and Nature/Extent of Contamination

As stated above, the Chicago, Milwaukee, St. Paul, and Pacific Railroad Company operated the Harlowton Roundhouse and Railyard as a railroad engine repair and fueling facility from 1900 to 1979. During its operation, overfills and spills within the refueling area and a leaking underground diesel supply line were identified as the primary sources of petroleum contamination at the Railyard.

The 2019 hazardous building materials inspection provided by Snowy Mountain Development Corporation EPA Brownfields Assessment Grant uncovered approximately 23,700 ft² of asbestos containing materials and 8,000 ft² of lead-based paint within the historic Roundhouse. These two contaminants were commonly-used building materials when the historic Roundhouse was constructed and operated.

Through a series of grant-funded assessments, the City, DEQ and its consultant have been able to quantify the nature and extent of the petroleum contamination within the historic Railyard. Approximately 5,150 cubic yards of surface and subsurface/vadose-zone soils are contaminated with petroleum hydrocarbons exceeding DEQ action levels within the Railyard.

6. Brownfields Site Definition:

• The site is (a) not listed or proposed for listing on the National Priorities List;
• The site is (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
• The site is (c) not subject to the jurisdiction, custody, or control of the U.S. government.

7. Environmental Assessment Required for Cleanup Grant Applications:

DEQ has reviewed and approved the workplans and reports for the following investigations/inspections that have occurred at the Railyard and Roundhouse:

• Program Site Investigation; Performed for the Montana Department of Health and Environmental Services (became DEQ) and EPA CERCLA in June 1993
• Program Preliminary Assessment; Performed for the Montana Department of Health and Environmental Services (became DEQ) and EPA Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in March 1994
• DNRC RDG Planning Grant funded Laser Induced Fluorescence (LIF) Investigation, Performed in collaboration with the DEQ, December 2015
• DEQ Orphan Share Account Funded Soils Characterization, Excavation, and Delineation Interim Action, October 2016 – April 2017
• DNRC RDG Planning Grant funded additional source area investigation, Performed in collaboration with the DEQ, March 2018
• DNRC RRGL Planning Grant funded wetland vision and design, Performed in collaboration with the DEQ, April 2018
• DNRC RRGL Planning Grant funded the proposal to the DNRC Regional office to consider this project as restoration of a historic wetland and therefore any surface water created from open excavations would be exempt from requiring a water right if it exceeded 10 acre-feet. Based upon this determination, the wetland visioning and design have been modified in collaboration with the City, DEQ, and a local wetland citizens group, June 2019 – May 2020
• Snowy Mountain Development Corporation EPA Brownfields Assessment Grant funded a hazardous building materials inspection at the historic Railyard Structures. This inspection uncovered approximately 23,700 ft2 of asbestos containing materials and 8,000 ft2 of lead-based paint within the historic Roundhouse, July 2019.
• DNRC RDG Planning Grant funded an Asbestos Inspection of debris in Overburden Soils, Performed in collaboration with DEQ, August 2019 – December 2019
• DNRC RDG Project Grant funded the excavation and landfarming of 5,600 cubic yards of petroleum contaminated soils and the removal of 2 USTs, Performed in collaboration with DEQ, October – December 2019.

8. Enforcement or Other Actions:
The City is unaware of any ongoing or anticipated environmental enforcement or other actions related to the site. The City has been in close coordination with DEQ, the agency which would lead and be aware of such enforcement actions.

9. Sites Requiring a Property-Specific Determination:
Not applicable.

10. Threshold Criteria Related to CERCLA/Petroleum Liability:
As described in the response to Criterion No. 5, the Site has both hazardous substances (lead based paint, asbestos) found within the Roundhouse and petroleum contamination found in the railyard soils. As the areas of hazardous substances and petroleum contamination are distinguishable, the City is providing information for both a. and b. criteria.

a. Property Ownership Eligibility – Hazardous Substance Sites

   ii. The City asserts that it meets the exemption requirements for asserting an affirmative defense to CERCLA Liability 104(k)(3)(E).

   a) The City acquired the property through a quitclaim deed from a trustee of the property of bankrupt Chicago Milwaukee St Paul and Pacific Railroad Company
   b) May 21, 1985
   c) All disposal of hazardous substances at the site occurred before the City acquired the property.
   d) The City affirms that it has not caused or contributed to any release of hazardous substances at the site.
e) The City affirms that it has not arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

b. Property Ownership Eligibility – Petroleum Sites

A copy of MT DEQ Petroleum Eligibility Determination for the Harlowton Railyard can be found in Appendix A1

11. Cleanup Authority and Oversight Structure:

- **Cleanup Oversight**
  The Harlowton Roundhouse and Railyard is a Montana State Superfund site. The City is currently conducting environmental assessments and remedial actions in coordination with the Montana Department of Environmental Quality’s (DEQ) Brownfields Program under the Voluntary Cleanup and Redevelopment Act (VCRA). DEQ will oversee all aspects of this project. VCRA formalizes the voluntary cleanup process in the state of Montana. It specifies application requirements, Voluntary Cleanup Plan (VCP) requirements, agency review criteria and time frames, and conditions for and contents of no further action letters.

  The City will procure a Qualified Environmental Professional (QEP) to provide oversight and technical expertise necessary for performing the proposed cleanup activities. The City will procure the QEP in accordance with procurement provisions of 2 CFR §§ 200.317 through 200.326. The City keeps a meticulous procurement record for all brownfields-related acquisitions documenting outreach, MBE/WBE good faith efforts, cost/price analysis, rationale for decision, etc.

- **Access to Neighboring Properties**
  Not applicable. No cleanup (or associated confirmation sampling or monitoring activities) to be performed using U.S. EPA funds will require access to neighboring properties.

12. Community Notification:

- **Draft Analysis of Brownfields Cleanup Alternatives**
  Printed copies of the draft ABCA were made available to the public at both the City Hall and the Harlowton Library on November 9, 2021. In addition, a copy of the draft ABCA was posted on the project website on November 9, 2021. The draft ABCA was also made available and discussed during a public meeting held from 6:00-8:00 pm on November 17, 2021 at the Harlowton Kiwanis Youth Center, Hwy 12, Harlowton, MT. The public meeting, at which the grant application materials were made available for review, was part of EPA Land Revitalization Grant’s Community Outreach Roundhouse design sessions. The public comment period for the draft Cleanup Grant and ABCA was open from November 9, 2021 to November 19, 2021. No comments were received during this period; therefore, the draft ABCA was merely retitled and the Final ABCA is provided as Attachment A2.
- **Community Notification Ad**
  The City and DEQ published a community notification on both the DEQ’s and the Project’s website on November 9, 2021. A community notification ad was also run in the local Newspaper (Times-Clarion) on November 11, 2021. The community notice was also sent through an eblast on November 9, 2021 to interested parties on the project’s mailing list. The Cleanup Grant Application and the Draft ABCA were posted on the projects website on November 9, 2021. Also included on the project webpage was a survey tool where the community could provide comment/input on the application and draft ABCA. A copy of the community notification documentation is provided as Attachment A3.

- **Public Meeting**
  The draft ABCA was made available and discussed during a public meeting held from 6:00-8:00 pm on November 17, 2021 at the Harlowton Kiwanis Youth Center, Hwy 12, Harlowton, MT. The public meeting, at which the grant application materials were made available for review, was part of EPA Land Revitalization Grant’s Community Outreach Roundhouse design sessions. Images used to illustrate the draft ABCA are provided as Attachment A4 and the meeting sign-in sheet as attachment A5. No comments on the draft Cleanup Grant or the ABCA were received by the City.

- **Submission of the Community Notification Documents**
  The following required community notification documents are provided as attachments:

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<th>Attachment</th>
<th>Description</th>
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<tbody>
<tr>
<td>A2</td>
<td>A copy of the Final ABCA</td>
</tr>
<tr>
<td>A3</td>
<td>Documentation of community notification and solicitation for comments on the proposal, includes a copy of the legal ad run in the local newspaper and screenshots of the notification posted on DEQ’s website (<a href="http://deq.mt.gov/Public/publiccomment">http://deq.mt.gov/Public/publiccomment</a>) and the notices on Project’s webpages (<a href="https://harlowton-railyard-mtdeq.hub.arcgis.com/">https://harlowton-railyard-mtdeq.hub.arcgis.com/</a> &amp; <a href="https://harlowton-railyard-mtdeq.hub.arcgis.com/pages/epa-cleanup-grant">https://harlowton-railyard-mtdeq.hub.arcgis.com/pages/epa-cleanup-grant</a>). These public notifications were posted on November 9, 2021.</td>
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<tr>
<td>A4</td>
<td>The Agenda of the November 17, 2021 Public Meeting and images that were used during the Cleanup Grant Application and draft ABCA discussion.</td>
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<tr>
<td>A5</td>
<td>Sign-in sheet for City Council Meeting</td>
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13. **Discussion on how the cost share will be met:**
   a) The City of Harlowton was awarded a 2021 Department of Natural Resources and Conservation Reclamation and Development Grant for Contaminated Soils and Free Product Removal at the Harlowton Roundhouse in Harlowton, MT, Phase 4. The city was awarded $500,000 by the MT legislature. See appendix a6.
14. An affirmative statement that a contractor/subrecipient has not been procured/named:
   a) No Consultant services have been obtained to perform this work. Any consultant selected to
      perform work funded by this application will be selected in compliance with the fair and open
      competition requirements in 2 CFR Part 200 and 2 CFR Part 1500. E