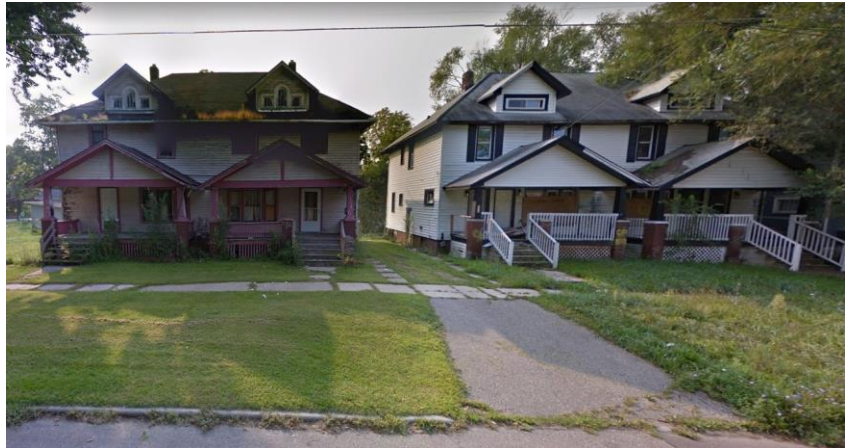


# DRAFT ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

WEST SEVENTH DUPLEXES, FLINT, GENESEE COUNTY, MI  
FEBRUARY 2022



PREPARED BY:  
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ON BEHALF OF:  
**GENESEE COUNTY LAND BANK AUTHORITY**  
452 SAGINAW STREET #200 FLINT, MI 48502

SUBMITTED TO:  
**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION V**  
77 WEST JACKSON BOULEVARD, CHICAGO, IL 60604



# **ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES**

## **Preliminary Evaluation**

**Prepared by The Mannik Smith Group on behalf of the Genesee County Land Bank Authority**

**509/511 and 513/515 W. Seventh Street, Flint, Genesee County, Michigan 48503**

### **1.0 INTRODUCTION AND BACKGROUND**

The purpose of this preliminary Analysis of Brownfield Cleanup Alternatives (ABCA) is to provide information about the property and the associated hazards and evaluate the possible remedial options. This evaluation will be revised, as needed and incorporated into a final activities report. This ABCA will be available for review by the United States Environmental Protection Agency (USEPA), local community and others as needed.

#### **1.1 Site Name and Location**

The two adjacent duplex buildings are located at 509/511 W. Seventh Street and 513/515 W. Seventh Street, Flint, Genesee County, Michigan 48503 (hereinafter, the Site). Parcel numbers for the Site are 41-15-356-024 and 41-18-356-021 respectively and total approximately 0.13 acres each. The Site as referenced to nearby roads and major topographical features is depicted on *Figure 1, Site Location Map*. The Site is located in an urban setting and is surrounded by vacant land and residential buildings.

#### **1.2 Background**

The Genesee County Land Bank Authority (GCLBA) acquired the two duplexes through involuntary transfer due to tax foreclosure in 2016 and 2014 respectively. Prior to the acquisition by GCLBA, it is presumed that each building was utilized as multi-family housing.

#### **1.3 Site Assessments**

In July 2016 and March 2017, Regulated Materials Surveys (RMS) were conducted at each building separately. Asbestos containing material and other universal wastes and hazardous materials were identified within each building. Sites were revisited in May 2021 to verify conditions has not changed significantly/ no new material was added to the site via illicit activities.

#### **1.4 Project Goal**

The planned end use of the Site is a grass parcel or green space until a definitive future use is otherwise identified with a prospective purchaser. The parcels sit within an area that is targeted for redevelopment by local CHODO's and Non-profits, as well as falling within the supportive area for the City of Flint's Choice Neighborhoods Initiative. Removing perceived barriers to acquisition and development from these parcels in the form of asbestos contaminated and blighted buildings will help to return these parcels to the tax rolls, while enhancing the safety, value, and aesthetics of the surrounding community.

#### **1.5 Public Notice**

Notice will be posted to GCLBA's Facebook and website with a link to the draft ABCA along with a request for comments. Documentation of these postings will be saved and added to the administrative file. GCLBA will allow 30 days for public comments from the date the notice is published in the local newspaper. GCLBA will also hold two virtual meetings to allow for receipt of public comment. The time of these meetings is to be determined, but they will be held via Zoom and during the 30-day public comment period. The dates and times will be determined prior to publishing public notice so that they may be included in the notice.

## **2.0 Applicable Regulations and Cleanup Standards**

### **2.1 Cleanup Oversight Responsibility**

GCLBA has extensive experience with blight management, and foreclosed properties where hazardous materials are abated, and where structures are either demolished or restored. GCLBA will procure all necessary permits licensed professionals and other required paperwork and professionals to conduct necessary remedial activities, demolition and site restoration activities, and required reporting.

### **2.2 Cleanup Standards for Major Contaminants**

Cleanup criteria requirements for response activities are established under Part 201 of the *Natural Resources and Environmental Protection Act* (NREPA), 1994 P.A. 451, as amended (Part 201) and the guidance set forth in the Michigan Department of Environmental Quality (MDEQ) Remediation and Redevelopment Division (RRD) *Guidance Document for the Vapor Intrusion Pathway*, dated May 2013 (and subsequent revisions). Part 201 asbestos criteria in soil and groundwater have been developed, however the use of these criteria is not applicable in this instance.

### **2.3 Laws and Regulations Applicable to the Cleanup**

The Clean Air Act (CAA) required the USEPA to develop and enforce regulations to protect the general public from exposure to airborne contaminants known to be hazardous to human health. The USEPA established the National Emission Standards for Hazardous Air Pollutants (NESHAP), which asbestos is one of many regulated pollutants. In Michigan, asbestos is regulated by the Michigan Department of Environment, Great Lakes and Energy (EGLE), Michigan Department of Licensing and Regulatory Affairs (LARA) and the Michigan Department of State Police (MSP). Specifically, the Air Quality Division (AQD) of EGLE has been delegated with the authority to enforce the Asbestos NESHAP in Michigan.

NESHAP regulations govern demolition and renovation activities in which asbestos is present. The NESHAP rule distinguishes between Regulated Asbestos-Containing Materials (RACM) that would readily release asbestos fibers when damaged or disturbed and those materials that are unlikely to result in significant fiber release during demolition activities. The purpose of an inspection is to determine if ACM within the Site building are RACM and thus, subject to the NESHAP, and to comply with the Michigan Occupational Safety and Health Administration (MIOSHA) and guidelines set forth in the Occupational Safety and Health Administration (OSHA) Regulations Standards 29 CFR 1910.1101.

RACM, as defined by NESHAP, is classified into four parts, (1) friable asbestos material, (2) Category I non-friable ACM (packing, gaskets, floor tile and roofing products) that has become friable, (3) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or (4) Category II non-friable ACM (all other ACM products) that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

The suspect ACM identified during this survey was grouped into homogeneous materials (i.e. similar materials which are uniform in color and texture) and:

- Described and quantified it in linear feet (LF) or square feet (SF);
- Identified and classified as friable or non-friable;
- Assessed as being in good, fair or poor condition;
- Assigned an EPA classification type (surfacing material, thermal system insulation or miscellaneous);
- Classified as RACM or non-RACM; and
- Sampled, or identified as presumed ACM (PACM).

Prior to demolition and or renovation, a notification of intent to demolish shall be made to the Environment, Great Lakes and Energy Air Quality Division (EGLE-AQD) and Licensing and Regulatory Affairs (LARA), Asbestos Program. Notification, according to the procedure described by the NESHAP, Title 40 of the Code

of Federal Regulations, Part 61, Subpart M, Notification, for renovation and demolition projects should be followed.

### **3.0 Evaluation of Cleanup Alternatives**

#### **3.1 Identification of Cleanup Alternatives**

To achieve the project goal of removing the two duplex structures creating a green space, three alternatives were considered and are as follows:

- Alternative 1 – No Action
- Alternative 2 – Asbestos Abatement and Demolition
- Alternative 3 – Asbestos Abatement, Structure Rehabilitation and Renovation

#### **3.2 Evaluation of Cleanup Alternatives**

Each alternative was individually evaluated for its effectiveness of removing hazards associated with contamination, practicality of implementation, and feasibility of implementation. Three cleanup alternatives were evaluated for the Site and are described below.

##### **3.3 Alternative 1 - No Action**

Alternative 1 – the No Action alternative would leave the two duplex structures in place. No asbestos abatement would occur and no improvements to the Site would be made. The No Action alternative would not be effective in removing any hazardous materials or preventing exposure to trespassers or potential exposure to the community due to deterioration. It would also not meet the project goal of creating an inviting green space to attract a user and return the property to the tax rolls. Alternative 1 is very inexpensive and is very easy to implement.

##### **3.4 Alternative 2 - Asbestos Abatement and Demolition**

Alternative 2 – Asbestos Abatement and Demolition would remove all asbestos containing materials from the Site and remove both duplex structures from the Site. Asbestos abatement and demolition would be followed by site restoration where clean backfill would be utilized to fill in any excavated areas. Seeding of the Site would occur last. This Alternative 2 is an effective way to create a safe green space with no buildings.

The costs to abate asbestos and remove the two duplex structures along with backfilling, final grade, seed and mulch is estimated to cost \$70,000. The ease of which abatement, demolition and Site restoration can be completed is moderately easy and can be completed in a short time frame.

##### **3.5 Alternative 3 - Asbestos Abatement, Structure Rehabilitation and Renovation**

Alternative 3 – Asbestos Abatement, Structure Rehabilitation and Renovation would leave both duplex structures in place. Alternative 3 only partially meets the goal as it would not create a green space. Rehabilitation and renovation would include the use of licensed professionals to ensure a safe building is left. These may include architects, licensed contractor and a lead-based paint professional.

The costs associated with Asbestos Abatement, Structure Rehabilitation and Renovation of both duplex structures is estimated to be \$275,000. It is possible that due to unforeseen circumstances, the costs could be greater. Asbestos Abatement, Structure Rehabilitation and Renovation are moderately difficult to implement.

#### **3.6 Comparison of Cleanup Alternatives**

The below *Table 1, Alternative Comparison* summarizes each option relative to effectiveness, cost and ease of implementation.

**Table 1: Alternative Comparison**

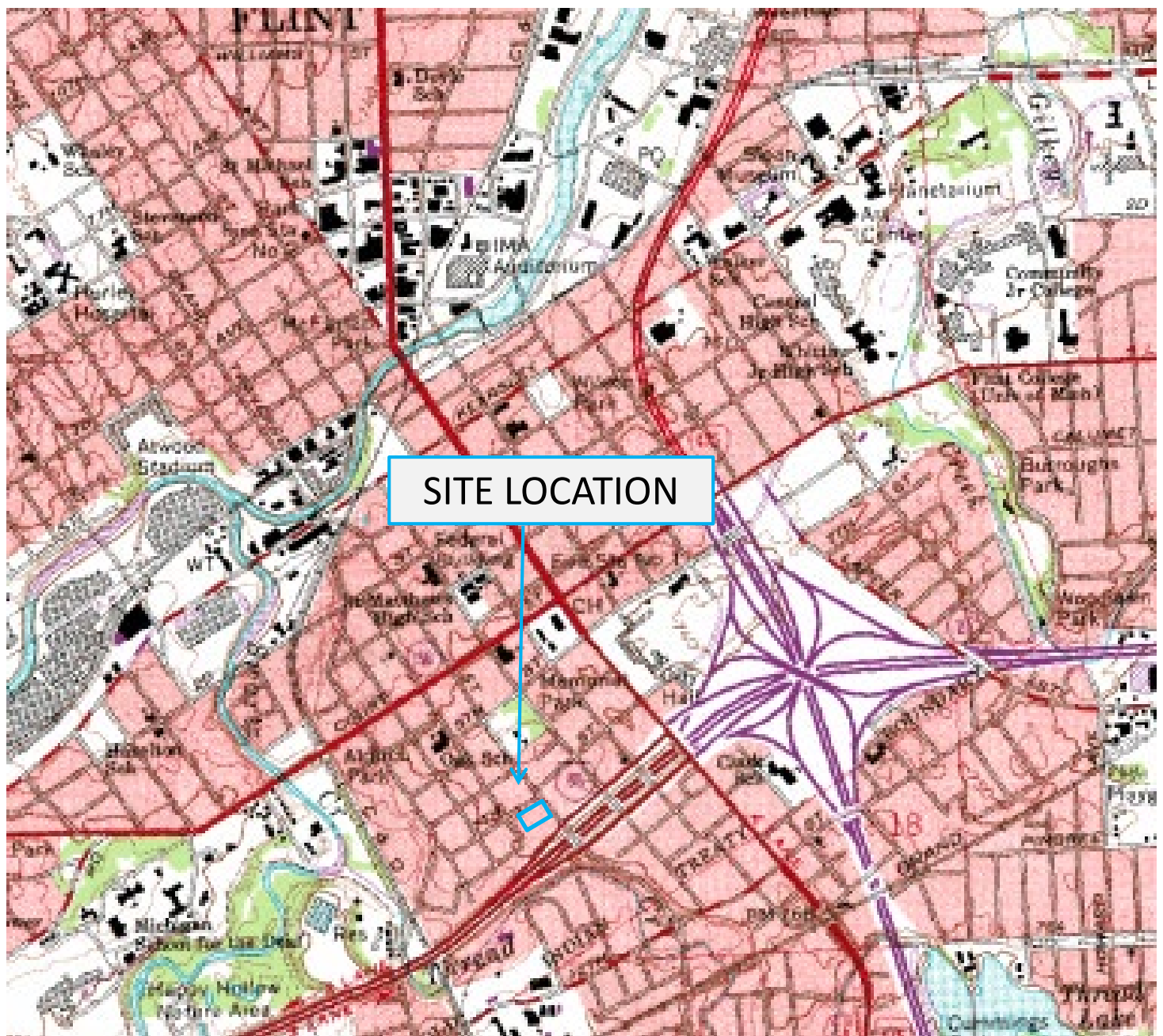
<b>Alternative</b>	<b>Effectiveness</b>	<b>Cost</b>	<b>Ease of Implementation</b>
<b>Alternative 1</b>	<b>No</b>	<b>Minimal</b>	<b>Very Easy</b>
<b>Alternative 2</b>	<b>Yes</b>	<b>70,000</b>	<b>Moderately Easy</b>
<b>Alternative 3</b>	<b>Partial</b>	<b>\$275,000</b>	<b>Moderately Difficult</b>

### **3.7 Recommended Cleanup Alternative**

The recommended cleanup alternative is Alternative 2 – Asbestos Abatement and Demolition. Alternative 1 – No Action does not meet project goals and leaves hazards in place. Alternative 3 – Asbestos Abatement, Structure Rehabilitation and Renovation does eliminate the hazards, however is more costly than Alternative 2 and does not meet the project goal of removing the structures and creating an interim green space. Alternative 2 removes the structure and creates a grass vacant lot that in the future can be used as green space.

## APPENDIX A SITE MAPS





0 0.1 0.2 Mile



NOTE: MAP ADAPTED FROM USGS TOPOGRAPHIC QUADRANGLES, NORTH FLINT, MICHIGAN. TAKEN FROM [https://www.dnr.state.mi.us/spatialdata/library/pdf\\_maps/topomaps/county\\_files/Genesee/Genesee\\_topo.htm](https://www.dnr.state.mi.us/spatialdata/library/pdf_maps/topomaps/county_files/Genesee/Genesee_topo.htm)



**FIGURE 1**  
**SITE LOCATION MAP**  
509/511 & 513/515 W. Seventh St.,  
Flint, Genesee County, Michigan

DATE  
06/24/2021

DRAWN BY  
SSR

Approximate  
Site Boundary

PROJECT #  
G2760057





## Drawing 2 SITE SCHEMATIC

509/511 & 513/515 W. Seventh St.,  
Flint, Genesee County, Michigan



NOTE: MAP ADAPTED FROM GOOGLE EARTH  
copyright 2021 GOOGLE

Not to Scale

DATE  
06/24/2021

DRAWN BY  
SSR

Approximate  
Site Boundary

PROJECT #  
G2760057