



COMMUNITY INVOLVEMENT PLAN

FOR THE

TREX PROPERTY SITE

**GRAND RAPIDS, MICHIGAN
MAY 2022**

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INTRODUCTION

In 1980, the United States Congress enacted the **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, also called **Superfund**. CERCLA authorizes the U.S. Environmental Protection Agency to investigate and respond to **hazardous substance** releases that may endanger public health and the environment. Congress amended and reauthorized the Superfund law in October 1986 as the **Superfund Amendments and Reauthorization Act**. If the site poses an immediate threat to public health or the environment, EPA can intervene with an **emergency response action**.

EPA prepared this **community involvement plan** to inform, engage and support the **community** affected by the Trex Property site located in Grand Rapids, Michigan. Our **community involvement** effort is committed to promoting effective and meaningful communication between the **public** and the Agency. We want to make sure the community's current concerns and information needs are considered as activities at the site progress.

This **CIP** describes EPA's plan for addressing concerns and keeping residents informed and involved in investigation and **cleanup** activities at the site. We will use this document as a guide to involve and communicate with residents, businesses and community organizations. We used several information sources to develop this plan, including research and discussions with the public.

EPA's community outreach objectives:

- Assist the public in understanding EPA's decision-making process and the community's role during the investigation and cleanup.
- Give the public accessible, accurate, timely and understandable information about the project as it moves forward.
- Reflect, respect and fully consider community concerns, questions, public input and information needs.

If you are interested in submitting comments or have questions or suggestions concerning this CIP, please contact:

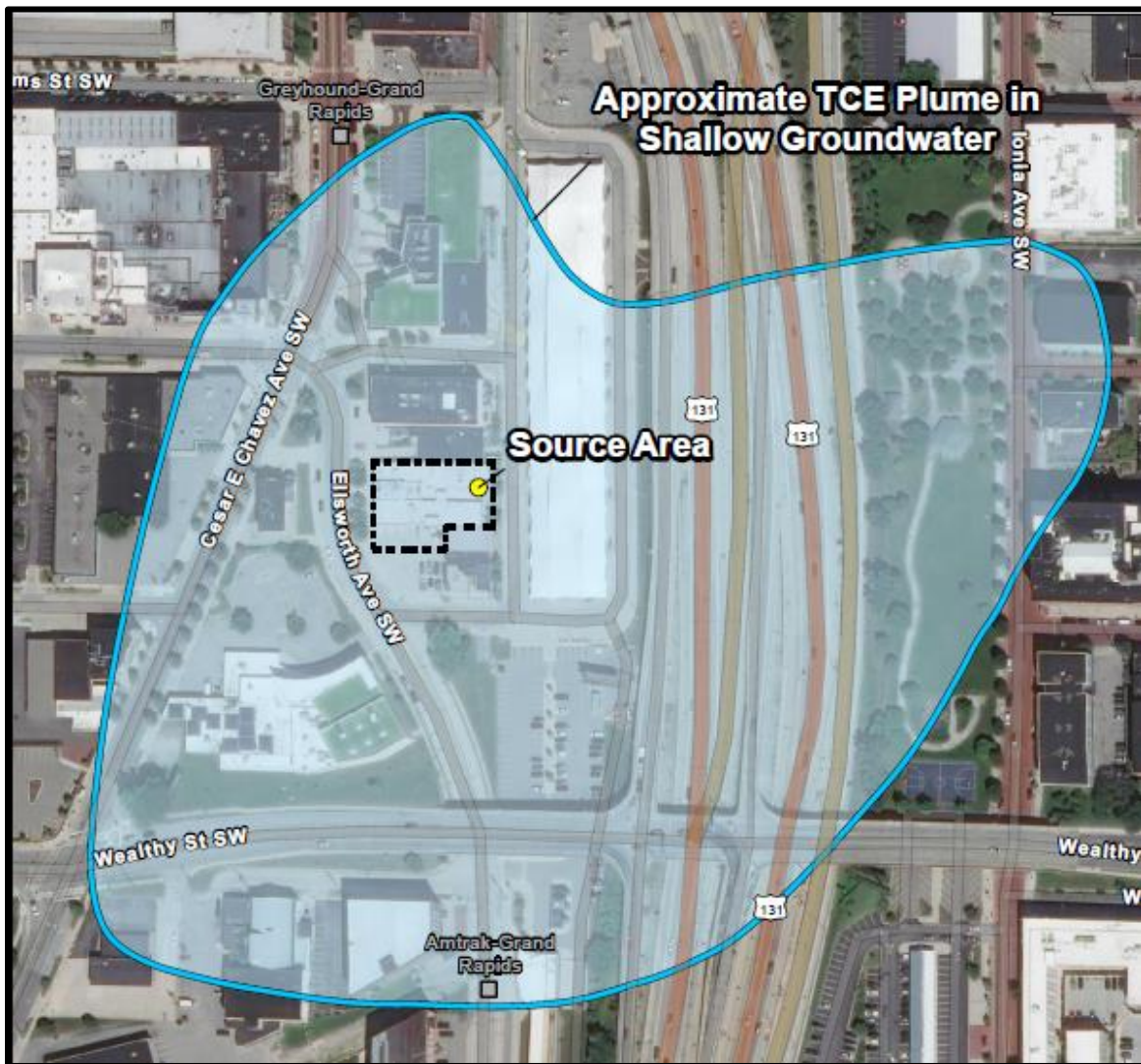
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*(Words in **bold** are defined in Appendix A.)*

SITE LOCATION

The Trex Properties site consists of a contamination plume originating from historical solvent processing operations conducted within the commercial building located at 312 Ellsworth Ave. SW. The site is located in a mixed residential and commercial neighborhood in downtown Grand Rapids, Kent County, Michigan. Based on current data, EPA has established the site boundaries to the south as Wealthy Street and commercial buildings beyond, to the west as Grandville Avenue SW and commercial properties beyond, Williams Street to the North, and to the east as Ionia Street and commercial and residential properties beyond.

Since the site area is serviced by Grand Rapids city water and there are no known drinking water wells in the area, EPA is confident that the contamination is not affecting drinking water.



SITE BACKGROUND

The property located at 312 Ellsworth Ave. SW was used as a solvent sale, equipment cleaning and solvent waste collection facility from the 1960's to the 1990's by Detrex Company. In 2013 Detrex transferred all its environmental liabilities and some of its properties to Trex Properties, LLC. Trex Properties is a potentially responsible party, or PRP, for the site and has accepted legal responsibility for cleanup and monitoring of the site.

In 2016, EPA was contacted by the Michigan Department of Health and Human Services after receiving a report that elevated levels of **trichloroethylene**, commonly known as **TCE**, were detected in the indoor air at the former facility. Michigan Department of Health and Human Services requested assistance from EPA to address the public health hazard related to vapor intrusion at the Trex Properties site. TCE is also known as a **volatile organic compound** or **VOC**. Because of their chemical makeup, VOCs can evaporate into the air even in low temperatures and are prone to cause an environmental problem called **vapor intrusion**. The unsafe gases can come from the polluted soil and contaminated groundwater below the surface. These vapors seep, or intrude, into homes and other buildings through structural cracks. TCE can cause health issues such as headaches and dizziness. Long-term exposure to these chemicals may cause cancer.

The PRP, Michigan Department of Environment, Great Lakes, and Energy, or EGLE, and EPA collected numerous indoor air samples at the source building, located at 312 Ellsworth Ave. SW, and other nearby buildings to ensure that indoor air was not being impacted by the contamination from the facility at levels that might affect human health. Results from the samples at 312 Ellsworth Ave. SW showed contamination levels well above EPA's human health benchmark. Results from other buildings were below this action level.

On June 14, 2016, an evacuation order was issued by the Kent County Health Department for 312 Ellsworth Ave. SW. To minimize the duration of the evacuation order at the source property, EPA directed the PRP to immediately install a sub-slab vapor mitigation system. The PRP installed a sub-slab depressurization system comprised of eight extraction wells installed below the basement slab, 2 installed within the crawl space and 5 installed through the basement walls. The PRP also installed numerous air purification units in the building to help filter the air. After this mitigation and follow up testing, the Kent County Health Department lifted their no-occupancy order on August 11, 2016.

On June 30, 2017, EPA and Trex Properties entered into a legal agreement known as an Administrative Order of Consent requiring Trex to investigate and cleanup the contamination at the site under EPA oversight. Trex is continuing mitigation and regular indoor air sampling at 312 Ellsworth Ave. SW and other buildings above the plume to ensure that indoor air levels of TCE do not become too high. Trex is also continuing to sample soil, soil gas, groundwater and conduits to determine the location of the plume and monitor for any changes over time. Trex has also implemented a groundwater cleanup pilot test and is the planning process for cleanup of soil contamination.

COMMUNITY INVOLVEMENT GOALS AND ACTIVITIES

When establishing the objectives for a site-specific community involvement program, EPA considers several factors, including federal requirements and EPA policies that assess the nature and extent of known or perceived site **contaminants**, as well as known community concerns and requests.

To be effective, our community involvement program is designed to meet the community's need to be informed, give information in a timely manner, and accommodate the community's interests and its willingness to participate in the decision-making processes. We must also share information in the language(s) the public can understand.

To meet the needs of the community, respond to information obtained and meet federal requirements, we have established the following objectives for our community involvement efforts:

- Enlist the support, coordination and involvement of local officials and community leaders.
- Enlist the support, coordination and involvement of the Michigan Department of Environment, Great Lakes and Energy, the Michigan Department of Health and Human Services, the city of Grand Rapids, and Kent County.
- Monitor citizen interest in the site and respond accordingly.
- Keep the community well-informed of ongoing and planned site activities.
- Explain technical site activities and findings in an understandable format for residents.
- Get public input on key decisions.
- Change planned activities, where warranted, based on community input.
- Update EPA's website regularly and provide useful information on it for the community.
- Update city and state officials on a periodic basis even if no activities are occurring at the site.
- Hold **public meetings**, when necessary, within the community to give all residents an opportunity to attend.

EPA has or will put in place the activities described on the following pages to engage the community meaningfully and actively in decisions regarding the investigation and cleanup of the Trex Properties site. The following plan is intended as opportunities for communication between the community and EPA and to address key concerns and questions raised during public outreach.

Specific Community Involvement Activities

To meet federal requirements and to address community concerns and questions described in the Community Concerns section, EPA has conducted (or will conduct) the activities described below. Through these activities, it is our goal to inform, involve and engage the community during site cleanup decisions and efforts. As the needs of the community change, we will modify the community involvement strategies to answer them.

- Maintain point of contact: Ruth Muhtsun is the EPA Community Involvement Coordinator and fields general questions for the site. EPA's **On-Scene Coordinator**, or **OSC**, for the site is Betsy Nightingale who serves as the project manager and another point of contact for community members about the site
- We will include current contact information for the project staff on all written and electronic information and will notify the community of any contact information changes.

COMMUNITY PROFILE

According to the City's webpage, Grand Rapids is the second largest city in the state. Grand Rapids is approximately 30 miles east of Lake Michigan, and the Grand River runs through the city's center. As of the 2010 census, Grand Rapids has a population of over 180,000 residents.

Grand Rapids is the childhood home of President Gerald Ford. The Gerald R. Ford Presidential Museum in the downtown area chronicles his presidency. After the President's death in 2006, he was buried on the grounds of his presidential museum in Grand Rapids. His wife, Elizabeth Ford, was interred next to her husband after she passed away in 2011.

Also located in downtown Grand Rapids is the Van Andel Arena and the DeVos Place. The Arena hosts concerts, sporting events, and community events, and is home to minor league hockey team. The DeVos Place includes a performing arts theater that is home to the Grand Rapids Symphony, The Grand Rapids Ballet, Opera Grand Rapids, and Broadway Grand Rapids. (<https://www.grandrapidsmi.gov/Government/About/City-of-Grand-Rapids-Facts-and-History#section-1>)

EPA's screening of area surrounding the site using EPA Region 5's EJ Screen Tool indicated that there is not a high potential for EJ concerns at this location.

CHRONOLOGY OF COMMUNITY INVOLVEMENT

To minimize the duration of the evacuation order at 312 Ellsworth Ave. SW, EPA directed the PRPs to immediately install a sub-slab vapor mitigation system at the source building. Since 2016, EPA has continued to oversee sampling at additional nearby buildings to determine whether TCE vapors are entering into the buildings at levels that may cause health concerns, and sampling of soil, soil gas and groundwater to ensure that the plume is delineated. EPA is also overseeing the PRPs work to clean up the contamination source area.

Since the cleanup was initiated, much of the work at this site involved frequent communication with area building owners and tenants to arrange sampling of the buildings, share sampling results and install mitigation systems in buildings where needed.

The current information does not indicate any impacts to residential properties. However, if additional TCE-related indoor air threats are identified at nearby properties through indoor air sampling, those properties may require mitigation. The mitigation systems will be installed and maintained by the PRP.

In December 2021, EPA distributed a factsheet detailing the expansion of the site investigation. The goal of expanding the study is to identify additional contamination in soil gas, indoor air, and groundwater beyond the current site boundaries. The team distributed this factsheet to properties within the site area.

As the removal action continues, EPA issues regular project updates to stakeholder agencies at the state, county, and city levels.

COMMUNITY CONCERNS

EPA has not conducted formal community interviews to date. However, several concerns and issues were presented during canvassing and meetings with community organizations. Below are some of the most frequently raised topics.

Human Health

The biggest concern shared by the community is the risk that site contaminants pose to human health. There were numerous questions regarding the effects of exposure, symptoms and treatment if exposed to pollution. Also, while explaining the process of vapor intrusion, many residents were concerned their drinking water may be polluted as well. It has been clarified among the community that the underground water that has been contaminated is not the same as the drinking water supplied by their municipality. EPA confirmed that no buildings in the study area were using water not serviced by the city.

APPENDIX A GLOSSARY – INITIALS – ACRONYMS

CERCLA. See Comprehensive Environmental Response, Compensation and Liability Act.

CIC. See Community Involvement Coordinator.

CIP. See Community Involvement Plan.

Cleanup. Actions taken to deal with a release or threat of release of a hazardous substance that could affect humans and/or the environment. The term “cleanup” is sometimes used interchangeably with the terms “remedial action,” “remediation,” “removal action,” “response action,” or “corrective action.”

Community. An interacting population of various types of individuals in a common location; a neighborhood or specific area where people live.

Community Engagement. The process of involving communities in all phases of the cleanup process. Communities are asked to provide input on how the cleanup will be conducted and how it may affect community plans and goals. See also Community Involvement.

Community Involvement. The term used by EPA to identify its process for engaging in dialogue and collaboration with communities affected by Superfund site. EPA’s community involvement approach is founded in the belief that people have a right to know what the Agency is doing in their community and to have a say in it. Its purpose is to give people the opportunity to become involved in the Agency’s activities and to help shape the decisions that are made.

Community Involvement Coordinator. The EPA official whose lead responsibility is to involve and inform the public about the Superfund process and response actions in accordance with the interactive community involvement requirements set forth in the National Oil and Hazardous Substances Pollution Contingency Plan.

Community Involvement Plan. A plan that outlines specific community involvement activities that occur during the investigation and cleanup at the site. The CIP outlines how EPA will keep the public informed of work at the site and the ways in which residents can review and comment on decisions that may affect the final actions at the site. The document is available in the site’s information repository maintained by EPA. The CIP may be modified as necessary to respond to changes in community concerns, information needs and activities.

Comprehensive Environmental Response, Compensation, and Liability Act. A federal law passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act. Commonly known as Superfund, CERCLA is intended to protect people’s health and the environment by investigating and cleaning up abandoned or uncontrolled hazardous waste sites. Under the program, EPA can either:

- Pay for site cleanup when parties responsible for the contamination cannot be located or are unwilling or unable to do the work; or
- Take legal action to force parties responsible for site contamination to clean up the site or pay back the federal government for the cost of the cleanup.

Contaminant(s). Any physical, chemical, biological, or radiological substance or matter that has an adverse effect on air, water, or soil.

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

Emergency Response Action. Refers to a short-term cleanup conducted by EPA to prevent, minimize, or mitigate immediate threats to human health and the environment.

Environmental Justice. An Executive Order issued by President Clinton that requires federal agencies to ensure the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies. Fair treatment means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

Groundwater. Underground supplies of fresh water.

Hazardous Substance(s). Any material that poses a threat to human health and the environment. Typical hazardous substances are toxic, corrosive, ignitable, explosive, or chemically reactive. Any substance designated by EPA to be reported if a designated quantity of the substance is spilled in the waters of the United States or is otherwise released into the environment.

Hazardous Waste. Byproducts that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes usually possess at least one of four characteristics (ignitability, corrosivity, reactivity or toxicity) or appear on special EPA lists.

Plume. A plume is a visible or measurable discharge of a contaminant from a given point of origin. It can be visible or thermal in water, or visible in the air as, for example, a plume of smoke.

OSC. See On-Scene Coordinator

On-Scene Coordinator. Federal officials responsible for monitoring or directing responses to all oil spills and hazardous substance releases reported to the federal government. OSCs coordinate all federal efforts and provide support and information to local, state, and regional responders.

Public Meeting. Formal public sessions that are characterized by a presentation to the public followed by a question-and-answer session. Formal public meetings may involve the use of a

court reporter and the issuance of transcripts. Formal public meetings are required only for the proposed plan and Record of Decision amendments.

Public. The community or people in general or a part or section of the community grouped because of a common interest or activity.

Superfund Amendments and Reauthorization Act. Modifications to the Comprehensive Environmental Response, Compensation and Liability Act, enacted on Oct. 17, 1986.

Superfund. The program operated under the legislative authority of CERCLA that funds and carries out EPA solid waste emergency and long-term removal and remedial activities. These activities include establishing the National Priorities List, investigating sites for inclusion on the list, determining their priority and conducting and supervising cleanup and other remedial actions.

TCE. See Trichloroethylene.

Trichloroethylene. A chemical that is used as a solvent to remove oils and grease from metal products and is found in adhesives, paint removers, typewriter correction fluids and spot removers. TCE is colorless liquid with an odor similar to ether and is a manufactured substance that does not occur naturally in the environment. It minimally dissolves in water and can remain in groundwater for a long time. TCE evaporates from surface water and soil, although it evaporates less easily from soil. Exposure from TCE is most commonly through breathing air that has TCE vapors, drinking or showering in contaminated water, or direct contact with contaminated soil. Long-term exposure to this family of chemicals is suspected of causing cancer, as well as problems of the liver and weakening of the immune system. More information can be found in the fact sheet in Appendix F on the following website:
www.atsdr.cdc.gov/toxfaqs/tfacts19.pdf.

Tetrachloroethylene. A chemical that is widely used for dry cleaning of fabrics and for metal-degreasing. It is also used to make other chemicals and is used in some consumer products. Other names for this chemical include perchloroethylene, or PERC, PCE, and tetrachloroethene. Much of the tetrachloroethylene that gets into water or soil evaporates into the air. High concentrations of tetrachloroethylene particularly in closed, poorly ventilated areas can cause dizziness, headache, sleepiness, confusion, nausea, difficulty in speaking and walking, unconsciousness, and death. Irritation may result from repeated or extended skin contact with it. These symptoms occur almost entirely in work or hobby environments when people have been accidentally exposed to high concentrations or have intentionally used tetrachloroethylene to get a “high.” More information can be found in the fact sheet in Appendix F on the following website:
www.atsdr.cdc.gov/toxfaqs/tfacts18.pdf

Vapor Intrusion. This occurs when underground pollutants release chemical vapors that travel up through the soil and accumulate beneath building foundations. Air in the building becomes polluted when vapors enter through cracks or holes in foundations and crawl spaces.

VOCs. See Volatile Organic Compounds.

Volatile Organic Compounds. A type of organic compound that tends to change from a liquid to a gas at low temperatures when exposed to air. As a result of this tendency, VOCs disappear more rapidly from surface water than from groundwater. Since groundwater does not come into contact with air, VOCs are not easily released and can remain in groundwater that is being used for drinking water, posing a threat to human health. Some VOCs are believed to cause cancer in humans.