

Community Relations Plan City of Girard Girard Leatherworks Site

Overview

The purpose of the Community Relations Plan (CRP) is to describe the City of Girard' strategy to address the concerns of residents potentially affected by activities conducted at Girard Leatherworks Site. Redevelopment plans have two components including construction of a trailhead for the planned Mahoning River Bikeway, a proposed spur of the Great Ohio Lake-to-River Greenway and the majority of the Site for corporate offices of an interested party.

Spokesperson and Administrative Record

The spokesperson for this project is James Melfi, Mayor of the City of Girard, who may be contacted at:
Girard City Administration Building
100 West Main Street SE
Girard, Ohio 44420
330-545-3879
GMartuccio@cityofgirardoh.gov

The Administrative Record is located at the City of Girard during office hours. During the 30-day comment period, a set of documents will also be available at Girard City Hall.

The administrative record is an evolving record and does not end with the end of the public comment period. The Administrative Record will periodically be updated, as appropriate, during the public participation and cleanup phases of the project. It will include:

- An Analysis of Brownfield Cleanup Alternatives (ABCA) and Remedial Action Plan with options that describes alternatives for environmental remedial action and the recommended alternative, if one has been identified.
- A summary of the site investigation report and the remedial action options that is written in plain English for use by the general population.
- Responses to public comments on the cleanup alternatives and the preferred alternative(s).
- A decision memo from the loan or grant recipient stating the cleanup alternative(s) that has been selected.

- A copy of the grant or loan.
- A letter from the state regulatory authority (OEPA) stating that the cleanup proposal has been approved.
- Progress reports, verification sampling, closeout reports, etc., all of which will document the progression and completion of the cleanup and any significant changes or problems that arise.
- A letter from the state regulatory authority stating that the cleanup has been satisfactorily completed and approved by the state.
- Information regarding options for redevelopment of the property after the environmental cleanup, if available

Site Description and History

Site Location

The Property is comprised of approximately 11-acre portion of the former Leatherworks site located at 1052 North State Street in the City of Girard, Trumbull County, Ohio. The site straddles Squaw Creek and is adjacent to the Mahoning River (separated only by a transportation corridor consisting of the Youngstown Beltway Co. Railroad - formerly Conrail R.R.).

Site History

According to historical records and facility maps, the subject Property was owned by the Ohio Leather Company from approximately 1902 through 1972. The Ohio Leather Company produced finished leather from animal hides with processes including washing, fleshing, depilation, bating, tanning, dying, and tempering. Many chemicals were used during the tanning process including sodium sulfide and chloride, lime, ammonia salts, sulfuric acid, chromium sulfate, and mercury. From approximately 1974 through 1994, the site was owned by D.L. & S.G. Realty (aka Berk Realty) and was used for material storage, including titanium metal shavings, used grinding wheels, 55-gallon drums, and totes of high pH solids. Various companies owned by Berk Realty operated on and/or utilized the Property during this time period. The property has been vacant and unused since 1994. A large fire destroyed the remaining large building on the site in 1995.

History of Public Health and Environment Assessments

The former Leatherworks industrial facility has been the subject of the multiple environmental assessments and some removal actions. The following summaries of assessment work conducted by regulatory agencies (i.e., Ohio EPA and USEPA) are copied from a 2007 draft of Findings and Orders prepared for the site by the Ohio EPA. In addition, summaries of previous Phase I and Phase II assessment work completed by environmental consultants/contractors on the property are provided in the following:

USEPA Removal Response Program Site Assessment (Tetra Tech EM Inc. June 5, 2001) – Shallow soil samples were collected, and the results showed elevated levels of chromium and lead, particularly in the waste water treatment area. Other contaminants included carbon disulfide, cadmium, and mercury.

Former Ohio Leather Company Property VAP Phase I ESA (McCabe Engineering & Contracting – October 2003) - This Phase I assessment designated 13 Identified Areas (IAs) in accordance with the Voluntary Action Program. Several of the IAs were rather broad in scope (e.g., IA-2 – Adjacent Tributaries; IA-7 Below Grade Concerns; and IA-13 Groundwater). Further Phase II assessment under the VAP was indicated to refine the scope of the IAs and to evaluate the nature and extent of contamination within the designated areas.

Preliminary Assessment/Site Inspection (Ohio EPA – 2004) - The sediment samples from the clarifier contained high levels of chromium at 218 mg/kg and lead a 5,110 mg/kg. Chromium and lead in analyzed soil samples reached 24,900 mg/kg and 83,500 mg/kg, respectively. Ground water samples collected also showed elevated metals, including lead (791 µg/L), nickel (603 µg/L), chromium (264 µg/L), and arsenic (815 µg/L). A number of soil and sediment samples (collected from the catch basins) contained high concentrations of polycyclic aromatic hydrocarbons (PAHs). Sample results for benzo(a)pyrene from the catch basin sediments ranged from 880 to 7,100 µg/kg.

USEPA (2004) - Conducted sampling in an area of the Site where Ohio EPA had previously found approximately 300 abandoned drums.

USEPA (2005) - Conducted additional sampling of the clarifier and lagoon areas of the Site and directed Site owner, Navy Friends, to remove drums and associated contaminated soil.

Expanded Site Inspection (USEPA - 2005) - Additional soil samples were collected, and the results indicated benzo(a)pyrene concentrations up to 37,000 ppb, aroclor-1245 up to 8,900 ppb, and various metals, including chromium, lead, and zinc.

Navy Friends (Site owner) retained McCabe Engineering & Contracting (2006) - Drums and some contaminated soil removed from the site.

Phase I Environmental Site Assessment (Turn-Key Environmental, Inc. – September 23, 2013) - This Phase I assessment designated eight Identified Areas under the VAP. Like the previous Phase I, the IAs were rather broadly defined, but covered the same general areas of suspected and/or known areas of contamination resulting from prior site operations. The Phase I report recommended Phase II assessment to further investigate the nature and extent of potential environmental impact within the Identified Areas.

State of Ohio v. Navy Friend, Inc. (Consent Decree – March 25, 2014) – Signed Consent Decree satisfying

civil liability to the State for all claims in the State's Complaint related to costs incurred under CERCLA.

Biological Water Quality Assessment of the Mahoning River and Squaw Creek (Ohio Leatherworks Property) - (Midwest Biodiversity Institute - December 31, 2015) - Previous biological surveys by Ohio EPA in 1980, 1994, and 2006 revealed severely degraded conditions that reflected toxic impacts from both industrial and municipal point sources. While substantial improvements in the quality of the biological assemblages following reductions in pollutant loadings from these sources was documented in 1994 and 2006, impairment of the Warmwater Habitat (WWH) aquatic life use remained in 2015. As such, the Mahoning River is a recovering aquatic ecosystem that has demonstrated the capacity to respond positively to remedial efforts. Squaw Creek was impaired at the upstream site in 2015, due in part to a sewer line failure, but fully attained WWH at the mouth and on the Ohio Leatherworks property. Both heavy metal and organic compounds in sediments exceeded one or more screening levels in the Mahoning River and Squaw Creek in 2015.

The results of the 2015 study revealed yet further improvements in the overall condition of the biological assemblages which validates past efforts to abate the serious pollution and severe impairment that was evident in the 1980 and 1994 Ohio EPA assessments. However, impairment of the WWH use remained at 3 of the 5 sites assessed in 2015. Partial attainment of the WWH aquatic life use was documented at the upstream-most 2015 site (River Mile [RM] 26.2), which is impacted by past and present-day industrial and municipal sources between Warren and Girard.

Pre-Remedial VAP Phase II Property Assessment - Former Ohio Leatherworks Property (Brownfield Restoration Group, LLC – April 12, 2016) - Brownfield Restoration Group, LLC (BRG) performed a Phase II Property Assessment (Phase II) pursuant to the Ohio EPA Voluntary Action Program (VAP) rule at the site beginning in February 2015 and prepared a Phase II Property Assessment report dated April 12, 2016. Funding for this assessment work was received by the Western Reserve Port Authority through a Brownfield Coalition Assessment Grant administered by the U.S. Environmental Protection Agency (USEPA). Phase II activities were conducted in accordance with the USEPA-approved Property-specific Sampling and Analysis Plan (SAP) and Quality Assurance Protection Plan (QAPP) for work completed under the Brownfield assessment grant.

Community Profile

Target Area Profile

The City of Girard (City) is a small, old industrial town located directly north of Youngstown and approximately halfway between Cleveland and Pittsburgh in the heart of the traditional steel industry of the Mahoning River Valley. Historically, the City's fortunes and challenges have been closely linked to the plight of steel manufacturing and other industries which sprang up along the banks of the Mahoning River. As such, the City and the target area Census Tract 9339 (Target Area) have been struggling economically since the decline of steel-making in the region beginning in the 1970's. At one time, the Mahoning Valley region produced the second-highest amount of steel in the U.S., after Pittsburgh, and

the entire region suffered significant decline following the closure of Youngstown Sheet and Tube in 1977, which resulted in the loss of roughly 50,000 jobs. More recently, the community has suffered due to the 2019 deallocation and subsequent closure of the General Motors Lordstown Assembly Plant, located just west of Girard, which employed roughly 5,400 and supported numerous related supplier companies. Even prior to COVID-19 impacts, the county unemployment rate consistently ranks as one of the highest in the State of Ohio. In the month of August, the unemployment rate was 11.4%, the third highest in the state according to ohiolmi.com.

The Target Area is sandwiched between US 422, which is the City's main transportation thoroughfare, and the Mahoning River. The area encompasses the City's primary industrial area as well as the Parkwood neighborhood that grew immediately surrounding and interspersed within the industrial facilities to house the workers once employed there. Much of the industry, including the target site, is now shuttered and long ago abandoned, leaving the neighborhood badly deteriorated and economically impoverished. The Target Area is a Qualified Opportunity Zone, specifically designated for the purpose of trying to attract and promote economic activity to stabilize and reverse the steep decline.

Chronology of Community Involvement

Community Outreach	Dates
Comprehensive Plan Completed	November 2015 - February 2017
Neighborhood Meetings	11/26/2019
Public Notice in Publication	9/15/2020
Public Notice Flyers	9/18/2020
Public Meeting	9/29/2020
Cleanup Grant Agreement fully executed	6/9/2021
Cleanup Grant announced at City Council Meeting	6/14/2021
Girard Library Showcase of Leatherworks site history announced	4/24/2022
Final ABCA posted on City website	5/27/2022

Key Community Concerns

The previously conducted VAP Phase II Property Assessment (BRG -2016) of environmental conditions at the site demonstrate that the predominant contaminant of concern is lead, although there are also areas impacted with TPH, PCBs, arsenic, mercury, and antimony found to exceed applicable soil standards. Potential exposure pathways are direct contact with soil, ground water ingestion, and impact to the ecological receptors in the adjacent Squaw Creek and Mahoning River. As a part of the cleanup, an update to the RAP was submitted to the OEPA by BRG. BRG will submit an Analysis of Brownfields Cleanup Alternatives (ABCA) to the USEPA. The City of Girard will seek public comment and will address any concerns in a timely manner.

Key Community Benefits

The proposed public notice process includes project updates at regularly scheduled Girard City Council meetings that local residents can easily attend. The proposed meeting site in the City Hall building is handicap accessible, and meets Americans with Disabilities Act (ADA) requirements. As the meeting site is accessible for neighborhood residents, it will encourage continued community involvement in the redevelopment of their City. The Girard Free Library will continue the historical display of the Leatherworks Site and the history of the factory and its workers. The Girard Free Library is located centrally in the city and is also handicap accessible, and meets Americans with Disabilities Act (ADA) requirements.

The City's reuse strategy has two components: first, redevelopment of the majority of the Site for the corporate offices of an interested party; and second, an approximately 1-acre strip along the southern edge of the Site will be used as a greenspace buffer for the adjacent residential neighborhood and for access to recreational areas. This reuse strategy for the Site aligns with three of the six priorities identified in the City of Girard's 2017 Comprehensive Plan, which was created with extensive stakeholder input: first, to prepare underutilized former industrial and commercial sites for future redevelopment; second, restore the integrity of the Mahoning River; and third, to connect park and recreational amenities into a cohesive network.

With regard to alignment with the stated goal of enhancing connectivity to park and recreational opportunities in the target area, the redevelopment plans include construction of a trailhead for the planned Mahoning River Bikeway, a proposed spur of the Great Ohio Lake-to-River Greenway. This trailhead connector will provide parking for vehicle access to the trailhead and will also provide a public connection to an existing walking trail in Todd Community Park located immediately adjacent to the east of the targeted Site. In the long term, the community will no longer be exposed to the potential risk of contact with the affected soils. The investment by EPA is making it possible to clean up the site.

Continued Community Involvement

Publication Notice Via website and Facebook Groups for Girard Residents – 05/31/22

Public Comment Period – 5/31/22-06/30/22

Council Meeting Updates – ongoing

Girard Free Library Historical Display – ongoing

Plaque at Proposed Trailhead – indefinitely