Mineral County, Nevada
EPA Brownfields Clean-up Grant for the Babbitt Former Military Housing Site
Narrative Information Sheet

Applicant	Mineral County 166 E. Street P.O. Box 1210 Hawthorne, NV 89415 (include both physical address and P.O. Box)
Funding Request	$1,517,000 EPA Brownfields Clean-up Funds (one site comprised of multiple parcels)
Location	Babbitt Former Military Housing Site Hawthorne, Nevada Mineral County, Nevada
Property Information	Babbitt Housing Site located South of SR 99 immediately north of the town of Hawthorne.
Project Director Contact	Alyssa Burke, Grant Administrator Mineral County Comptroller's Office P.O. Box 2021 Hawthorne, NV 89415 (P)775-945-0706 (F)775-945-1749 aburke@mineralcountynv.org
Chief Executive Contact for the Project	T. Jaren Stanton, Esq., District Attorney Mineral County District Attorney's Office P.O. Box 2021 Hawthorne, NV 89415 (P) 775-945-3636 jstanton@mineralcountynv.org
Population	4,487 persons
Other Factors	Checklist Attached

MINERAL COUNTY NEVADA EPA CLEAN-UP GRANT OTHER FACTORS CHECKLIST	**PAGE NO.**
Community population is 10,000 or less.	1, 4, 6 and 9
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy. (Mineral County Zoning Ordinance has an expedited permit process for renewable energy projects to encourage use of solar and other renewable energy technology.)	3 and 10
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures.	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area: Mineral County, Nevada is pleased to submit this grant for clean-up funding for the former Babbitt Military Housing site located in Hawthorne, Nevada. Mineral County covers 3,813 square miles in the high desert region of Northern Nevada of which the majority of land is in Federal ownership. The total population in the County is 4,487 persons. The town of Hawthorne where the site is located is the County's population center and the County seat.

In 1930 when the Naval Ammunition Depot opened in Hawthorne, it provided jobs for residents and an important economic boost to the area during the Great Depression. During the Second World War, a military buildup throughout the nation resulted in an economic boom in the West and in Nevada. The government constructed the Babbitt subdivision in Hawthorne to house Naval Ammunition Depot workers and their families. The site included close to 600 housing units and a small-town center. Although the Hawthorne Ammunition Base is still operating under the US Army, the peace time need for military housing diminished. The older military homes were subsequently either moved or demolished between the late 1950's and 1990. In the late 1990's, the site was deeded to the Mineral County by the US Army. Prior to transfer of the site to the County, the U.S. Army cleared the site of any remaining structures and removed the fuel tanks. However, many of the building materials were simply plowed under and there remains asbestos containing building materials throughout the site.

Hawthorne Target Area. Mineral County is largely comprised of federal lands predominantly owned by the BIA, BLM, and USFS. As such, the County is sparsely populated with the unincorporated town of Hawthorne serving as the County seat. The population of the County is 4,487 and the population of Hawthorne CDP is 2,734 persons (2020 5-year ACS). The town of Hawthorne is the target area of this grant. The 318-acre Babbitt housing site is located to the immediate north of the town and is one of the largest sites adjacent to the town which has infrastructure and services available to support re-use and economic development. The site is also located near multiple transportation linkages. Hawthorne, though small, has an economic base that relies in large part on tourism, the adjacent military base, and increasingly warehousing, transport and logistics. Hawthorne serves as a gateway to many of the natural and wilderness areas nearby and to the popular Walker Lake area. The Babbitt site is located between Hawthorne and Walker Lake making it a logical site for new commercial, warehousing, and mixed uses.

This site is extremely important to the economic development of Hawthorne and Mineral County. As noted above over 90% of the County is federal land. As such, Mineral County has limited private lands with the potential to create employment and local taxes. Because of the limited economic development in the target area, 44% of the residents are low income and unemployment rates are high. Mineral County is one of the poorest Counties in Nevada because of the limited private property to support a healthy tax base. The Hawthorne target area, the largest town in the County, has transportation linkages and infrastructure, is adjacent to other economic generators (Walker Lake tourism, and Hawthorne Military Base) and therefore, was selected for reinvestment and economic growth.

ii. Description of the Proposed Brownfield Site(s). The Babbitt clean-up site consists of 20 parcels which reflect the war-time subdivision of the site for military housing and a small, town center. In total, the site comprises 318.15 acres. There are no structures remaining on site with the exception of a water well on one parcel. There are however, building materials and foundation materials that were "plowed under" as part of the military's clearance activities. Based on the Phase I and Phase II reports prepared for the site, Asbestos Containing Material (ACM) is present in the building foundation remnants throughout the site. The site was also sampled for a number of other contaminants including lead, pesticides, petroleum, and fuel projects. Some DDE (a derivative of the pesticide DDT) was found on the site. As noted above, during World War II, the site was developed with over 580 military personnel housing units served by fuel tanks, and other town structures such as a bowling alley. In the 1950's, the military offered

these homes for sale with the condition they be moved off the site. Those that did not sell were cleared over time. In the early 1990's, the military began systematically removing the fuel tanks on site and any fuel contaminated soils. The cleared site was transferred to Mineral County in 1998 (prior to CERCLA).

Since taking ownership of the site, it has remained vacant. In 2007, Mineral County was successfully awarded a Brownfields Community-wide Assessment grant to undertake site assessment of 36 Babbitt parcels as an essential step to making the site available for re-use. Phase 1, Phase II reports as well as clean-up plans were prepared for 35 of the parcels[1]. These reports confirmed asbestos debris on the sites. Additionally, recent testing confirmed that no petroleum products or fuel leakage from the former fuel tanks was discovered. Mineral County made contact with Northern Nevada Development Agency (NNDA), the regional economic development agency serving the area, for help with re-use planning for the site including preparing an application to the State of Nevada Brownfields Program. Unfortunately, the recession devasted the economy and local budget of Mineral County could not pursue NDEP funding because of the required match requirements. When the recession passed, Mineral County once again worked with NNDA as part of a Brownfields Coalition site assessment grant. In 2020/21, the EPA Brownfields Coalition grant funded updated the site assessments and clean-up plans for the site in preparation for this clean-up grant. Despite COVID-19, the Nevada economy has rebounded well and by cleaning up the site and reducing the cost and risk to a buyer, the planned sale and reuse of the site is probable.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans. The Babbitt site is immediately north Hawthorne, the County Seat. The town of Hawthorne is entirely built out. Because the Babbitt property is adjacent to the town Center and Highway 95, it is the best place for urban growth in the area. State Route 95 goes through Hawthorne and forms the northern boundary of the Babbitt site. Route 95 is a major north south corridor of the State that connects Las Vegas in southern Nevada with Fallon in Northern Nevada. From Highway 95, the site includes a grid system of roadways ready to be re-used for new uses.

SRI International prepared the *Nevada's Plan for Recovery & Resilience* (2020) which identified that the site was part of the Northern Nevada Sierra Pacific integrated economic area or megapolitan area. These megapolitan areas exhibit economic integration, common trade routes and commuter routes and other measures of economic interdependence. In the Northern Nevada/Sierra Pacific megapolitan area for instance, technology transfers from the San Francisco Bay Area to metro Reno have transformed Northern Nevada. Northern Nevada is a key logistical and warehousing connection between the interior states and major markets in the San Francisco Bay Area, Sacramento, and Stockton. These same linkages connect with major rail ports and seaports (ex: Port of Oakland). Given the demand for warehousing and light manufacturing space in Northern Nevada, the County seeks to first support these types of commercial/manufacturing uses. The parcels are zoned a mix of Commercial (C) and Manufacturing (M) on the Mineral County Zoning Map.

Immediately north of the Babbitt site along Highway 95 is the Hawthorne Industrial Airport. In addition, Hawthorne is the eastern terminus of Highway 357 which extends to the California border and connects with major routes such as Interstate 395. The site, therefore, has many transportation advantages to support the intended re-use as a warehouse and logistical hub for transport of goods from the interior of Nevada to West Coast ports. With new employment opportunities, it is expected that new neighborhood serving commercial uses and housing will also be in demand which could be accommodated either on site or through re-use of older highway commercial sites in Hawthorne. In addition to employment generating uses, a portion of the site may be used to develop workforce housing and trails and open space for the new employees.

[1] One of the 36 parcels required only a Phase 1 assessment. Note: the Clean-up Grant addresses the 20 parcel that remain in County ownership.

ii. Outcomes and Benefits of Reuse Strategy. Re-use of the Babbitt site is expected to generate the following outcomes and benefits:

1. Re-use of existing infrastructure by utilizing the roads and utilities installed on the site and along Highway 95 as part of the former Babbitt Military Housing.
2. Transfer the land from County ownership (non-taxable) to private investors thereby supporting the County's tax base which funds essential services.
3. Assuming the site (net acreage) is developed for light industrial or warehousing uses, it is estimated that the permanent direct employment would be between 1,200 and 1,300 new jobs. Construction period employment and indirect (multiplier effect) employment would further increase the job development potential of these jobs.
4. Re-use of the site will prevent sprawl in the area and reduce pressure to develop more sensitive natural areas such as Walker Lake, or agricultural areas.
5. Clean-up of the site will prevent the migration of asbestos fibers and ACM contaminants from migrating off-site. The site is in a FEMA special flood hazard zone and under current conditions sheet run-off and erosion from the site may transport contaminants into drainage pathways leading to Walker Lake.
6. The site is already served by several highway and Interstate route connections, and is adjacent to the Hawthorne Industrial Airport.
7. No displacement is planned as part of this re-use. However, depending on the nature of the industries involved in the re-use, portions of the site may be reserved for new housing for employees.
8. All new development in Nevada complies with current building standards for energy efficiency and as such the development will incorporate energy efficiency measures. Additionally, the high desert location makes the incorporation of solar energy highly feasible and desirable. The County has an expedited permit process in their Zoning Ordinance for Renewable Energy Projects to encourage the use and development of alternative energy.
9. The Mineral County Parks and Recreation District has previously been involved in the Brownfields Assessment grants for this site and it is expected that some portion of the site would be reserved by the County for parks and recreation uses.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Characterization. It is not anticipated that additional funds will be needed for site characterization since a substantial amount of assessment and clean-up planning work has been done for the site and an updated Phase II and Brownfield Clean-up Alternatives plan has been recently completed. If additional funds are needed, the County will seek the assistance of the Nevada State Department of Environmental Protection which is the authorized state Brownfields program.

ii. Resources Needed for Site Remediation. The County is fairly confident that the requested EPA funds will cover the costs of the clean-up. In preparing the budget, the County attempted to ensure that the costs included in the Clean-up Plan (2022) addressed all costs and reasonable inflation value was assigned to the costs since funds will not be available and put to work until late 2023 or early 2024.

iii. Resources Needed for Site Reuse. The site is currently vacant and no major demolition activities are required to market and re-use the site. The site is of level terrain with basic services to the site. Marketing is the main resource need to capture investor awareness and interest. The County will continue to collaborate with the Northern Nevada Development Authority (NNDA) and their Certified Site Program to help market the sites. The Certified Site Program connects turn-key sites with clean title, proper zoning, transportation linkages, services, and no environmental constraints with investors seeking property or development in Northern Nevada. Mineral County is a member of NNDA. Other resources that might be needed are workforce recruitment and training. The Nevada Governor's Office of Economic Development (GOED) offers several programs for

workforce development and rural and community development. Hawthorne is served by Great Basin College in Elko, NV (on-line learning).

iv. Use of Existing Infrastructure. The site was formerly developed for military housing and has basic infrastructure including driveways and frontage on Route 95 and a system of internal roadways. The site is immediately north of the town of Hawthorne and across 95 from the Hawthorne Industrial Airport so any additional service extensions would most likely be from these adjacent properties. Hawthorne Utilities provides trash pick-up disposal and water and sewer services in the area. NV Energy provides electric service to the area. NV Energy's Economic Development Team is available to provide interested investors with information and assistance including energy options (including renewables), site selection, labor force, training programs, tax advantages, financing, and other Nevada information or connections. The site has previously been assessed for solar array and this is a high priority re-use for portions of the site.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding. Mineral County has one of the lowest budgets of the all the Nevada Counties in large part because 90% or more of the County is in federal ownership to either protect natural resource or manage public lands. As such, the County's tax base is limited to basically the small towns of Hawthorne and Walker Lake, and payment in lieu of taxes from federal land agencies, Additionally, the County's small population (less than 5,000 persons) limits the County's access to several funding sources such as Community Development Block Grant entitlement funds and HOME funds. While this site is a catalyst site for economic development and job creation in town of Hawthorne, the costs of remediation cannot be accommodated in the annual budget without cutting back essential and mandated services such as public safety, schools, or the court. The town of Hawthorne (not incorporated) where the site is located is not a wealthy area. The 2020 median income of Hawthorne was $20,866 compared to $62,043 in the State of Nevada. Almost half (44%) of the residents are low income and unemployment rates are consistently higher than those of the state and nation. Other Demographic Indicators from the EPA Screen Tool are summarized in the Table below:

Town of Hawthorne, NV EJ Screen Tool (Version 2.1)	Value	State Avg.	USA Avg.
Socioeconomic Indicators			
Demographic Index	32%	41%	35%
People of Color	20%	52%	40%
Low Income	**44%**	32%	30%
Unemployment Rate	**9%**	7%	5%
Linguistically Isolated	0%	6%	5%
Less Than High School Education	10%	13%	12%
Under Age 5	3%	6%	6%
Over Age 64	**34%**	16%	16%

As noted in Section 1, (a), ii, above Mineral County has been developing a clean-up plan and funding for clean-up for the Babbitt site since 2007. The County's population of less than 4,500 persons and the amount of federally owned land in the County generates only a very small local budget to meet essential or mandated services such as police protection and courts. For this reason, despite efforts to seek prior clean-up funds through the State NDEP and EPA program, the County could not meet the matching funds requirements of those sources. Now that EPA does not require matching funds for clean-up, the County is applying for a Brownfield Clean-up Grant.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations. Sensitive populations in the target area of Hawthorne include a high percentage of low-income persons (44%) and a high percentage of elderly persons (34%). 28.3% of the children live in poverty compared to 17.5% in the State and 12.6% of seniors (65+) live in poverty compared to 7.4% in the State. The area is also disadvantaged because of high unemployment rates and low educational attainment. The lack of jobs in the area affects the levels of income, poverty, and educational attainment. According to the Climate and Economic Justice Screening Tool (CEJST), 97% of persons in Hawthorne age 15 years or older are not enrolled in college, university, or graduate school. Ten percent (10%) of the population has less than a high school degree. For many in the community, there are no incentives for higher education because of the lack of jobs in the area and few residents have exposure to or knowledge of the new job categories and industries Nevada is attracting.

Low incomes and poor educational attainment also affects the health of the population and limits access to information or programs that would support healthy lifestyles. The CEJST reports that the rate of persons reporting diabetes in Hawthorne places the community in the 69th percentile in the nation. According to Data USA, Mineral County has the highest rate of food insecurity in the State of Nevada and also the highest rate of diabetes risk in the State. Similar, Hawthorne is in the 86th percentile for persons reporting a heart disease diagnosis.

According to Nevada Division of Public and Behavioral Health, Mineral County has the lowest rate of mothers who receive pre-natal care. The rate of low birth weights is the highest in the State. Lack of jobs and economic growth also results in a high rate of mental illness and depression and drug use. The rated value for drug overdose deaths in Mineral County was 43.3, one of the highest rates in the State compared to 21.4 for the State overall.[2]

The goal of this grant is to clean-up for re-sale the 318-acre Babbitt site to support new jobs and services for the town of Hawthorne. In turn, it is anticipated that this will result in more incentives for education and job training, reduce the number of families and children in poverty, and increase access to health care and healthier lifestyles.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions. According to the Nevada Division of Public and Behavioral Health (networkofcare.org), Mineral County has a very high rate of cancer deaths. The age adjusted total cancer rate in Mineral County is 177.7 compared to the Nevada rate of 161.8. Similarly, the lung cancer death, prostate cancer death and incidents of female breast cancer rates in Mineral County are much higher than the state average. The hospitalization rate for COPD is the highest in the state at 520.4 (per 100,000) which may be due to the proximity of major freeways and the related pollution. The EJ Screen report found that Hawthorne is in the 90th percentile for ozone pollution in the nation. As noted above, the rates of asthma, diabetes and heart disease are also higher than the State overall. The EJ Screen tool assessed risks from exposure to contaminants in the town of Hawthorne and reported the following:

EJ Screen Tool Standard Report	Hawthorne NV	State Avg.	Percentile in State	USA Avg.	Percentile in USA
Pollution and Sources					
Particulate Matter 2.5 (µg/m3)	6.98	7.06	40	8.74	12
Ozone (ppb)	**52.7**	57.9	1	42.5	90
Traffic Proximity (daily traffic count/distance to road)	**41**	620	12	710	19
Lead Paint (% Pre-1960 Housing)	**0.28**	0.05	94	0.28	57
Superfund Proximity (site count/km distance)	0.014	0.012	78	0.13	10

[2] Nevada Division of Public and Behavioral Health, Nevada's Network Of Care For Public Health Web Site, Health Data for Mineral County. https://mineral.nv.networkofcare.org/ph/HealthIndicatorsDashboard.aspx

EJ Screen Tool Standard Report	Hawthorne NV	State Avg.	Percentile in State	USA Avg.	Percentile in USA
RMP Facility Proximity (facility count/km distance)	**0.23**	0.4	63	0.75	41
Hazardous Waste Proximity (facility count/km distance)	0.43	1.9	18	2.2	41

(3) Promoting Environmental Justice. The community of Hawthorne is a low-income community with high poverty and unemployment rates. The community, while benefiting in the past from government decisions to locate ammunitions facilities, and mining activities on federal land surrounding the area, now finds that these industries no longer provide much employment or economic base for the local community. The Ammunitions Depot for example, is run by the government, but staffed by a small crew of contractors. US Route 95 which runs through town of Hawthorne where the majority of the County's residents reside, brings with it high levels of particulate matter (PM) and ozone pollution and the attendant health effects of asthma, lung cancer and COPD. Clean-up and re-use of the Babbitt site will promote environmental justice for this very low-income town by re-using vacant military land adjacent to the town center to promote new job development and increase the tax base of the County. In turn, this can reduce unemployment in the town and reduce commute rates as new jobs are created immediately adjacent to the town. The high levels of poverty and food insecurity in Hawthorne can be alleviated by creating new jobs for local residents. An enhanced tax base will support critical public services for the community such as schools, adult education and job training for new jobs, and access to health services. The acreage available for re-use can also help support new commercial uses such as grocery stores to serve this food desert[3]and address food insecurity. If grant funds from the small Cities CDBG program, or other sources (Land and Water Conservation funds) the County may be able to develop open space and recreational facilities on the site to serve the community.

b. Community Engagement

i. Project Involvement and ii. Project Roles. As noted above, Hawthorne, is the County seat, and the largest town in the County. Although a small community (2,734 people), Hawthorne is a close-knit community. The table at the end of this section highlights the community groups that are interested in participating in the decisions affecting the site and their role.

iii. Incorporating Community Input. Mineral County has multiple ways to gather and respond to community input and the County is familiar with the community input requirements of the Brownfields program having successfully administered a Brownfields Community-wide Assessment Grant (2007) and participated as a partner in the Northern Nevada Development Authority's Coalition grant. Because it is a small town both in population and in total area, the best methods of publicizing meetings and updates about the project is through notices in public facilities (Hawthorne is the County Seat), the elementary, junior high and high school, and other gathering areas such as the grocery store. Updates at the County Board of Commissioners which meets twice a month. This is a good forum to agenda clean-up updates, and take community input about the project. Both the school district and the County also have websites that are frequently used by the community to get information regarding community events and news. The majority of persons in the community are English speakers and it is not anticipated that translation services will be required, however, if needed they are available in the community. In the event that social distancing is required, the County will have to rely on internet resources or social distance meeting criteria for meetings. The County maintains a page dedicated to Brownfields on their website which can easily be updated to report to the community on clean-up and re-use activities at the Babbitt site.

[3] A food desert is an area that has limited access to affordable food.

Organization	Contact	Role
Hawthorne Chamber of Commerce	www.chamberofcommerce.com/united-states/nevada/hawthorne/	Outreach to the local community about the clean-up and re-use process
Hawthorne Library	Courtney Oberhansli, Director coberhansli@mineralcountynv.org. 775-945-2778	Outreach to the local community about the clean-up and re-use process. Community Meeting facility.
Northern Nevada Development Authority	Amy Barnes Director of Business Development 308 N. Curry Street, Ste. 101 Carson City NV, 89703 (775) 883-4413	Re-use planning and developer/investment connections
Boys & Girls Clubs of Mason Valley	525 9th St Hawthorne, NV 89415 775-945-2428	Outreach to parents and youth about Brownfields, clean-up progress, and re-use and possible jobs and training.
Mineral County School District	751 A Street Hawthorne, NV 89415	Outreach to parents and youth about Brownfields, clean-up progress, and re-use and possible jobs and training.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan. The Clean-up Plan outlines how the asbestos containing material (ACM) identified on the site will be handled and removed. ACMs containing greater than 1% asbestos are required to be abated prior to the by a certified Nevada licensed asbestos abatement contractor. Areas identified for remediation include:

- Approximately 1,600 square feet (SF) of weathered, potentially friable 9"x9" floor tile located on the commercial pad located on Lexington Ave between 20th Street and 21st Street;
- Approximately 2,800 SF of weathered, potentially friable 12" x 12" floor tile located on the commercial pad located on Lexington Ave between 20th and 21st Street;
- Approximately 300 Acres of windblown friable and non-friable asbestos debris including asbestos cement siding (ACS), asbestos cement piping (ACP), weathered floor tile pieces, and
- Subsurface Orangeburg sewer piping was likely used uniformly during construction in the residential concrete pads and sewer laterals to the street sewer main (approximately 25,000 LF).

The NDEP will be the regulatory agency overseeing the project. The NDEP has reviewed and approved the site cleanup plan. Handling of impacted hazardous materials (DDE) removed during Site development will be overseen by a State of Nevada Certified Environmental Manager (CEM) and the NDEP, as necessary. Removal of asbestos, asbestos debris and sub-surface asbestos piping will be overseen by a Nevada Certified Asbestos Consultant and coordinated with NDEP and if necessary, EPA Region 9. EPA, Region 9 is the regulatory authority for enforcing National Emission Standards for Hazardous Air Pollutants (NESHAP) air quality regulations pertaining to asbestos emissions and enforcement for construction sites in Mineral County.

Costs for removal of the asbestos debris and abatement of the sub-surface asbestos piping including crushing of clean concrete on-site are estimated at $1,155,000.00. Costs include training, removal of the asbestos debris, demolition, and crushing of the concrete pads (after asbestos has been removed), project oversight, asbestos disposal, temporary fencing, and site stabilization. Project oversite requires an environmental technician on site during all clean-up operations. There is approximately 20,000 cubic yards of concrete material that needs to be demolished, crushed, and stockpiled. In addition to the asbestos

removal, recommended alternative includes the elimination of DDE contamination. The cost for the DDE removal has been estimated at $300,000.00. The Clean-up Plan includes an outline of health and safety protocols for the removal of the materials, disposal procedures, and the role of regulatory and oversight agencies.

b. Description of Tasks/Activities and Outputs

TASK 1: Project Startup and Selection of a CEM. Cooperative Agreement. It is anticipated that Mineral County (County) will first develop a Cooperative Agreement with EPA for the funds. *Schedule*: September 2023 to January 2024. *Lead:* County. *Outputs*: executed Cooperative Agreement.

Solicitation and Selection of a Certified Environmental Manager (CEM). The County will select a CEM and negotiate and execute a contract with the CEM. *Schedule*: October 2023 to January 2024 *Lead:* County. *Outputs*: CEM contract for the project approved.

CEM Tasks. The CEM contract shall identify the types of services the County needs to successfully complete the site clean-up including:

- Assisting with a community "kick-off" meeting to explain the project and schedule of activities to the citizens of Hawthorne (Lead County with CEM)
- Confirming the assumptions of the Clean-up Plan (CEM, NDEP and EPA)
- Coordinating with EPA and Nevada Department of Environmental Protection (NDEP) as needed to ensure the site is part of the State's Voluntary Clean-up Program. (County and CEM)
- Translating the Clean-up Plan into a clear scope of work to be incorporated into the Clean-up Bid and Contract documents. (CEM)
- Submitting and obtaining approval of a Quality Assurance Project Plan (QAPP)

Schedule: February 2024 to May 2024 *Lead:* CEM and County. *Outputs*: Acceptance into State Voluntary Program, approved QAPP; scope of work for Clean-up Contractor Bid.

TASK 2: Site Clean-up. Solicitation and Selection of a Clean-up Contractor. In association with EPA and NDEP, the County and CEM will further identify the types of qualifications and licenses needed for any contractor or subcontractors involved in the clean-up of the site. The County will bid the Clean-up work in accordance with an applicable federal contracting and labor regulations. Following receipt of bids/proposals the County and CEM will develop negotiate a contract with the most successful bidder and shall coordinate with NDEP and EPA to ensure the contract includes all applicable State and federal requirements. *Schedule*: May through July 2024. *Lead*: County and CEM with assistance from NDEP, EPA and CEM. *Outputs*: Clean-up Bid Solicitation, Clean-up Contract Approved. Secure Site (construction fencing, signage) and Start of Work*: Schedule:* Late July 2024 -August 2024. *Lead.* Clean-up Contractor. *Outputs*: Secure Site. Clean-Up and Removal of Older Asbestos Materials. *Schedule*: On-going August 2024 until complete. L*ead*: Clean-up Contractor with oversight by CEM and NDEP. *Outputs*. Clean site and documentation of proper materials disposal.

TASK 3: Sampling and Oversight by the CEM and Project Close-out. Once the clean-up contractor is selected, the County, CEM (in consultation with NDEP) and contractor shall discuss the scope of work and determine if sampling is necessary during the clean-up work, and shall arrange for post sampling of soils to ensure the clean-up meets health and safety standards. The CEM will be responsible for arranging any sampling required by NDEP or EPA. *Schedule*: As needed to meet requirements for a No Further Action letter. *Lead*: CEM and NDEP *Outputs*. No Further Action Letter or equivalent documentation of site clean-up. Clean site ready for marketing and re-use.

c. Cost Estimates.

Babbitt Site Clean-Up Budget (EPA Clean-up Grant Costs)				
BUDGET CATEGORY	**TASK 1 Start-up/Selection of CEM**	**TASK 2: Clean-Up**	**Task 3: Sampling and Closure**	**Total**
Personnel and Fringe	$12,800	$19,200		$32,000
Travel				
Equipment				
Supplies				
Contractual	$15,000	$1,450,000	$20,000	$1,485,000
Sub Total Direct Costs	$27,800	$1,469,200	$20,000	$1,517,000
Indirect Costs				
Grand Total	$27,800	$1,469,200	$20,000	$1,517,000

Personnel Costs: For Task 1: 160 Hours of County staff to negotiate the Cooperative Agreement, Solicit and Select a CEM, execute the CEM Contract and develop the scope of work to bid and select a remediation contractor (City staff rate $80/hr. which include salary and benefits). Personnel costs for Task 2 include costs for construction contract management and oversight estimated at up to 10 hours a week for approximately 5 months of remediation work.

Contractual Costs: These costs cover the CEM's contract costs to prepare the scope of work for the remediation contract, coordination as necessary with the County, NDEP and EPA during the development of the remediation scope and during remediation, and sampling and post-sampling as necessary. Costs also include preparation of the Stormwater Protection Plan, and dust control plan. In addition to the CEM costs, the remediation contract for material crushing, removal and disposal is estimated at $1,300,000 per the ABCA.

d. Measuring Environmental Results. The County and CEM will develop a schedule for site clean-up including sampling and monitoring of all health and safety protocols. Because Northern Nevada experiences unpredictable winter weather it is anticipated that Clean-up work will start in the April/May 2024 timeframe. The CEM will be responsible with NDEP and the County for ensuring proper disposal manifests are filed. Reporting to EPA and the ACRES system will occur, as necessary. The County will report to EPA and NDEP the amount and type of asbestos containing material removed, the number of acres cleaned of asbestos, and progress on re-use of the site which is the eventual project outcome.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure and ii. Description of Key Staff. Mineral County is the only general local government serving the 4,487 residents of Mineral County. The County seat is the town of Hawthorne, where the Babbitt site is located. The County is governed by a Board of Commissioners elected by the people. The County supports the public safety, judicial and court services, public works, parks and recreation and senior services among other responsibilities. Ms. Alyssa Burke, County Grants Manager will serve as the day-to-day manager for the Brownfields Clean-up grant. The Grants Manager is positioned in the County Comptroller's Office and Ms. Burke will have direct access to the required accounting systems to financially monitor the grant. The County's Public Works Department will assist the program as necessary with construction bidding and compliance with federal contracting requirements.

ii. Acquiring Additional Resources. The County previously administered an EPA Brownfields Community-wide Assessment Grant under which the County developed a Request for Proposal and other materials to selecting a qualified consultant; establish a selection committee to review responses to the RFP and select the most qualified environmental firm. Following this, the County developed a contract between Consultant and Mineral County incorporating U.S. EPA and State of Nevada protocols.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant. Mineral County received a Community-wide Brownfields Assessment Grant in 2007.

(1) Accomplishments. The Mineral County Community-wide Assessment Grant resulted in the following accomplishments:

- Completed 13 Phase I Hazardous Materials Assessments and 6 Phase I Petroleum Assessments
- Completed 6 Hazardous Materials Clean-up Plans
- Completed 2 QAPPs, one for Hazardous Materials and one for Petroleum Assessments
- Completed a Community Involvement Plan including development of the Mineral County Brownfields website. Additionally, Mineral County held two community meetings, one in Mina and one in Walker Lake. A total of four presentations were given to the County Board of Commissioners, including a technical presentation that included an overview of the Phase I ESAs completed in the high priority Babbitt redevelopment area.
- With approval from EPA, Region 9, Mineral County also used EPA Brownfields grant funding to develop and promote the Mineral County Renewable Energy Plan (MCREP) to address heightened interest in the County's vast geothermal, solar, and wind resources in Mineral County. Under the grant, a renewable energy application form and comprehensive evaluation criteria were developed, allowing Mineral County to evaluate business plans through a rigorous screening process, thereby helping to ensure the selection of financially viable projects for long-term, sustainable renewable energy development in Mineral County. The County's Zoning Ordinance now includes section 17.37A which provides for Expedited Renewable Energy Generation Project Permit Processing.
- The current concept for reuse at the Site is a multi-purpose commercial and industrial center with a workforce housing component. Reuse of the Site is currently underway with an approximate 20-acre development located on parcels APN#'s 006-640-29-45. Southern Tire Mart (STM) is scheduled to commence on these parcels by early 2023. The tire business includes a 34,335 square foot (SF) commercial building which will be divided into a 2,995-SF office, 19,630 SF service bays, 6,400-SF truck service bays and 5,310 SF of covered loading docks, 2.83-acre fenced storage area, paved parking, landscaping and other site improvements. It is anticipated that up to 10 additional direct jobs and an additional 10 indirect jobs will be created by the new facility.

(2) Compliance with Grant Requirements. Mineral County used an array of management tools to monitor progress under the Brownfields grant to ensure that work plan tasks were successfully completed consistent with the EPA-approved work plan budget. This was to be accomplished by: requiring the consultant firm to submit a monthly report summarizing progress under the grant, the status of budget expenditures followed by a meeting with Mineral County program staff and management; establishing standing quarterly meetings with the environmental consulting firm; hosting an annual meeting with EPA, Region 9 programmatic and financial management staff to review accomplishments under the grant, the progress of ongoing and planned activities and a review of the project budget to include detail on Mineral County's cost share; preparing and submitting Property Profile Forms (PPF); Quarterly reports prepared and electronically submitted to EPA, Region 9; update project and PPF data into EPA's Assessment, Cleanup and Redevelopment Exchange System (ACRES) database as needed; submitting an annual MBE/WBE report; submitting an Annual Financial Status report; and, preparing and submitting a final summary report highlighting the accomplishments, lessons learned and future tasks necessary to complete the cleanup and development of sites. Mineral County made the decision to close-out the grants and de-obligate the remaining balance of $ 121,655.53 ($30,465.76 Hazardous Materials and $91,186.77 Petroleum), and return the funds to EPA due to the recession. The depressed local economy brought about by the recession led to a loss of developer interest in redeveloping available properties and resulted in reductions in the County operating budget which impaired Mineral County's ability to manage the grant at that time.

SITE: Former Babbitt Housing Area (BHA)		
Threshold Criteria	**Response**	**Comments**
I. Applicant Eligibility	The applicant is Mineral County.	The County is a local government eligible as a "General Purpose Unit of Local Government."
2. Previously Awarded Clean-up Grants	The proposed site(s) have not received funding from a previously awarded EPA Brownfields Cleanup Grant.	
3. Multi-purpose Grant Status	N/A	
4. Site Ownership	Owned by the applicant, Mineral County.	
5. Site Information		
	Former Babbitt Housing Area Mineral County, NV 89101 Owner: Mineral County 105 South A Street, Suite 1 Hawthorne, NV 89415 APNs 006-640-06, -08, -17 through -25, -27, -29, -30, -33, -34, -38, -39, -42, -43, -46, -54, -55, -58, -59, -62, -64 & -65	The proposed sites comprise approximately 318.15 acres.
6. Status and History of Contamination	The Property is part of the former Babbitt Housing Area (BHA). The BHA was constructed during World War II to provide housing for married civilian workers for the Hawthorne Army Depot (HAD). During the period of 1940 -1945, a total of 580 duplexes were constructed. The duplexes were rectangular (27 x 55 feet), one story, wood-framed, asbestos-sided, and set on concrete foundations and topped with gabled roofs covered with asbestos shingles. In addition to the duplexes, twelve (12) community buildings were constructed in the center of the complex. The community buildings were used as a grocery store, post office, drug store, bank, bowling alley, theater, nursery/day care center, and dispensary. The community buildings were of various sizes, one story, wood-framed, asbestos-sided on concrete foundations with gabled roofs covered with asbestos shingles. The need for housing at the BHA varied over the years with periods of demolition or construction of housing units depending on the need for housing by the US Navy. In 1977, operation of the HAD was transferred to the Army. In 1984, the Army Corps of Engineers began excessing the remaining BHA units. Housing units were again sold and removed. The last occupant moved from the BHA in 1987. Some of the buildings not suitable for sale were disposed of in the HAD construction landfill	

SITE: Former Babbitt Housing Area (BHA)		
Threshold Criteria	**Response**	**Comments**
	about a mile to the north. The last duplex was removed in July 1994. Many of the concrete foundations, sidewalks, and underground utilities associated with the former buildings remain in place. One of the original community buildings in BHA, the bowling alley, was not removed and remained in operation until 2004 (the bowling alley was demolished by Mineral County in 2005, however the building pad remains). One additional building, an elementary school, was situated in the community center near the center of the BHA. The elementary school property and bowling alley property are located outside the Property boundary. Much of BHA was heated with fuel oil (diesel fuel #2 or DF #2). The heating oil USTs located on the proposed sites were removed prior to Mineral County assuming ownership of the proposed sites. No contamination associated with the previous USTs has been identified during subject investigations conducted on the proposed sites. Elm tree windbreaks were located on the proposed sites and some of a portion of the proposed sites was utilized for agricultural purposes. According to the "Environmental Assessment for the Transfer of Ownership of the Babbitt Housing Area Portion of the Hawthorne Army Depot" dichloro-diphenyl-trichloroethane (DDT) and other pesticides to include organophosphates may have been used along the tree line windbreaks and agricultural areas located in the former BHA. Based on the results of historical investigations conducted at the proposed sites, DDE was detected in the soil along a portion of the former tree line above the Preliminary Remediation Goal (PRG) residential limit but below the PRG industrial limit. Additionally, approximately 300 acres of non-friable, (weathered) asbestos debris remains scattered across the site in areas where the former residential and commercial buildings were located, and areas of weathered asbestos floor tiles remain on the existing concrete foundations. Subsurface asbestos piping associated with the residential duplex foundations has been identified and it is likely that asbestos piping is encased in all of the residential concrete pads	
7. Brownfields Site Definition	The site is not listed or proposed for listing on the National Priorities List; 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; and c) not subject to the jurisdiction, custody, or control of the U.S. government.	

SITE: Former Babbitt Housing Area (BHA)		
Threshold Criteria	**Response**	**Comments**
8. Provide the date of the Phase II or equivalent report.	The following Phase II Environmental Site Assessments (ESAs) have been conducted on the proposed sites: - US Department of the Army, 1996, Preliminary Assessment Screening No. 38-EH-5034-97, Babbitt Housing Area, Hawthorne Army Depot, Hawthorne, Nevada dated July 22-25 - US Department of Army correspondence to Division of Environmental Protection, 1995, Babbitt Heating Oil Tank Closure Documentation dated April 21 - Converse Consultants, 2009, Limited Phase II Environmental Site Assessment Report, Hazardous Materials, APN 006-64-012/013/015/016/017/018/019, Babbitt, Mineral County, Nevada dated November 10 - Converse Consultants, December 2009, Limited Phase II Environmental Site Assessment Report, Petroleum, APN 006-64-012/013/015/016/017/018/019, Babbitt, Mineral County, Nevada dated December 2009 - Converse Consultants, October 2022, Asbestos Survey and UST Investigation, Babbitt Commercial Subdivision, Hawthorne, Nevada dated October 12,2022	
9.Site Characterization and State Voluntary Compliance Program	The NDEP is not requiring any additional site characterization activities to be conducted at the proposed sites. Mineral County affirms that there is a sufficient level of site characterization from environmental site assessment performed to date for the remediation work to begin at the proposed sites.	NDEP Letter Attached
10. Enforcement or Other Actions.	Mineral County affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the proposed sites for which Brownfields Grant funding is being sought.	
11. Property Specific Determination Required?	Mineral County affirms that the proposed sites do not require a Property-Specific Determination as they do not fall under the “special class” of properties listed in CERCLA 104 (k).	

SITE: Former Babbitt Housing Area (BHA)		
Threshold Criteria	**Response**	**Comments**
12. Threshold Criteria Related to CERCLA/Petroleum Liability		
a. Property Ownership Eligibility-Hazardous Substance Sites	**Exceptions to Meeting the Requirements for Asserting and Affirmative Defense to CERCLA Liability** 1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2022 *a) Circumstances Under Which Property was Acquired.* Mineral acquired the proposed sites from the United States of America Quit Claim Deed. *b) Acquisition Date*: The proposed sites were acquired by Mineral County on October 14, 1998. *c) Identify whether all disposal of hazardous substance at the site occurred before applicant acquired the proposed sites*: Disposal of heating oil UST was conducted by the US Army before ownership of the site was transferred to Mineral County. Documentation provided by the NDEP states that 694 Heating oil tanks were removed in 1994 – 1995. Asbestos debris, asbestos containing materials (ACM) and DDT/DDE contamination however was not removed before the Army transferred ownership to the County and remains at the site to this present day. *d) Affirm the applicant have not caused or contributed to any release of hazardous substances at the proposed site*s: Mineral County affirms that they have not caused or contributed to the release of hazardous substances identified at the proposed sites. *e) Affirm that the applicant has not, at any time, arranged for the disposal of hazardous substances at the proposed sites or transported hazardous substances to the proposed sites*. Mineral County affirms that they have not, at any time, arranged for the disposal of hazardous substances at the proposed sites, or transported hazardous substances to the proposed sites.	

SITE: Former Babbitt Housing Area (BHA)		
Threshold Criteria	**Response**	**Comments**
13. Clean-up and Oversight Structure		
a. a. Describe how you will oversee the cleanup at the site(s). Indicate whether you plan to enroll in a state or tribal response program. If you do not plan to enroll in a state or tribal response program, or an appropriate state or tribal response program is not available, you will be required to consult with EPA to ensure the cleanup is protective of human health and the environment. Therefore, if you do not plan to enroll in a state or tribal response program, provide a description of the technical expertise you have to conduct, manage, and oversee the cleanup and/or whether you plan to acquire additional technical expertise.	Mineral County does plan on enrolling in a state response program run by the Nevada Division of Environmental Protection (NDEP) The entire 5,400 feet long by 10 feet wide by 1-foot-deep area of identified/suspected DDE impacted soils will be excavated and transported to the Mineral County landfill to be used as cover. All identified asbestos containing debris and subsurface asbestos piping will be removed and transported to an approved facility. All of the concrete foundations/slabs on grade located on the proposed sites will be demolished (asbestos piping is encased in the foundations/slabs). After excavation and demolition, the asbestos free concrete pads are to be sorted and crushed and stockpiled onsite for use as aggregate base material. Handling of impacted material removed from the proposed sites will be overseen by a State of Nevada Certified Environmental Manager (CEM) and the NDEP, as necessary. The CEM will have the authority to implement the site cleanup plan in areas of known DDE contamination and asbestos abatement. The CEM will be present during soil characterization, excavation, and asbestos removal activities.	
b. Cleanup response activities often impact adjacent or neighboring properties. For example, access to neighboring properties may be necessary to conduct the cleanup, perform confirmation sampling, or monitor offsite migration of contamination. If this type of access is needed, provide your plan to acquire access to the relevant property(ies).	The cleanup activities will not extend beyond the boundaries of the proposed sites.	
14. Community Notification Documents • a copy of the draft ABCA(s); • a copy of the newspaper ad (or equivalent) that demonstrates solicitation for comments on the application and that notification to the	An Analysis of Brownfield Cleanup Alternatives (ABCA) for the proposed sites is attached. Community Notification documents also attached.	

SITE: Former Babbitt Housing Area (BHA)		
Threshold Criteria	**Response**	**Comments**
public occurred at least 14 calendar days before the application was submitted to EPA • the comments or a summary of the comments received; • the applicant's response to those public comments; • meeting notes or summary from the public meeting(s); and • meeting sign-in sheet/participant list.		
15. Named Contractors or Subrecipients	None named.	

Analysis of Brownfields Cleanup Alternatives
Preliminary Evaluation – Babbitt Commercial Subdivision
Hawthorne, Nevada

Prepared by the Mineral County

SITE DESCRIPTION AND BACKGROUND

Site Location and Description

The subject site is located on a portion of the former Babbitt Housing Area in Mineral County, Nevada and is comprised of 28 irregularly shaped parcels of land identified by the Mineral County tax assessor as APNs 006-460-06, -08, -17 through -25, -27, -46, -54, -55, -58, -59, -62, -64 & -65 (referred to as the "Site" herein). The Site is bound on the north by US 95 followed by the Hawthorne Municipal Airport and commercial businesses, to the west by the Hawthorne Army Depot (HAD) main base, to the east by Armory Road followed by commercial businesses, and to the south by vacant land. The Site occupies approximately 318 Acres and is currently vacant except for a structure (well house) associated with a municipal well that is located on the property. The Site is zoned for commercial and industrial use

The address, and acreage for each parcel included in the Site, based on information provided by the Mineral County assessor, is provided in the table below.

APN	ADDRESS	ACRES
006-640-06	T8N R30E Parcel E	0.71
006-640-08	T8N R30E Parcel G	3.18
006-640-17	T8N R30E SEC 21 Parcel A1C	67.96
006-640-18	T8N R30E SEC 21 Parcel A1B	19.93
006-640-19	T8N R30E Parcel F	47.76
006-640-20	T8N R30E SEC 21 Lot 1	2.26
006-640-21	T8N R30E SEC 21 Lot 2	2.26
006-640-22	T8N R30E SEC 21 Lot 3	1.08
006-640-23	T8N R30E SEC 21 Lot 4	1.03

APN	ADDRESS	ACRES
006-640-24	T8N R30E SEC 21 Essex Court	0.68
006-640-25	T8N R30E SEC 21 Lot 5	1.11
006-640-27	T8N R30E SEC 21 21st Street	1.06
006-640-46	T8N R30E SEC 21 23rd Street	1.03
006-640-54	T8N R30E SEC 21 Parcel B1-B	10.61
006-640-55	T8N R30E SEC 21 Parcel B1-C	10.0
006-640-58	T8N R30E SEC 21 Parcel B2-B	7.83
006-640-59	T8N R30E SEC 21 Parcel B2-C	7.83
006-640-62	T8N R30E SEC 21 Parcel B1-BA	15.52
006-640-64	T8N R30E SEC 21 Parcel B2-AB	100.19
006-640-65	T8N R30E SEC 21 Parcel B2-A	16.12
	TOTAL	**318.15**

Previous Site Use and Remediation

The Site is part of the former Babbitt Housing Area (BHA). The BHA was constructed during World War II to provide housing for married civilian workers for the Hawthorne Army Depot (HAD). During the period of 1940 -1945, a total of 580 duplexes were constructed. The duplexes were rectangular (27 x 55 feet), one story, wood-framed, asbestos-sided, and set on concrete foundations and topped with gabled roofs covered with asbestos shingles. In addition to the duplexes, twelve (12) community buildings were constructed in the center of the complex. The community buildings were used as a grocery store, post office, drug store, bank, bowling alley, theater, nursery/day care center, and dispensary. The community buildings were of various sizes, one story, wood-framed, asbestos-sided on concrete foundations with gabled roofs covered with asbestos shingles. The need for housing at the BHA varied over the years with periods of demolition or construction of housing units depending on the need for housing by the US Navy.

In 1977, operation of the HAD was transferred to the Army. In 1984, the Army Corps of Engineers began excessing the remaining BHA units. Housing units were again sold and removed. The last occupant moved from the BHA in 1987. Some of the buildings not suitable for sale were disposed of in the HAD construction landfill about a mile to the

north. The last duplex was removed in July 1994. Many of the concrete foundations, sidewalks, and underground utilities associated with the former buildings remain in place. One of the original community buildings in BHA, the bowling alley, was not removed and remained in operation until 2004 (the bowling alley was demolished by Mineral County in 2005, however the building pad remains).

One additional building, an elementary school, was situated in the community center near the center of the BHA. The elementary school property and bowling alley property are located outside the Site boundary.

Much of BHA was heated with fuel oil (diesel fuel #2 or DF #2). Some of the buildings located on the southern part of the BHA were heated with propane. Most of the duplexes were heated by one UST; however, some duplexes had two USTs. The UST capacities were 220 gallons.

Elm tree windbreaks were located on several of the parcels and some of the parcels were utilized for agricultural purposes. According to the "Environmental Assessment for the Transfer of Ownership of the Babbitt Housing Area Portion of the Hawthorne Army Depot" dichloro-diphenyl-trichloroethane (DDT) and other pesticides to include organophosphates may have been used along the tree line windbreaks and agricultural areas located in the Babbitt Area. Dichlorodiphenyldicloroethylene (DDE) a break down product of DDT was detected in the soil along a portion of the tree line above the Preliminary Remediation Goal (PRG) residential limit but below the PRG industrial limit.

The BHA contained approximately 55 transformers, many of which were known to contain PCBs. The US Department of the Army stated that all of the PCB bearing transformers were removed and disposed of properly during the 1992-1994 period and the remaining transformers located on in the BHA do not contain PCBs (U.S. Department of Army, 1996).

Based on documentation provided by the Nevada Division of Environmental Protection (NDEP), 694 heating oil USTs were removed from the BHA in 1994-1995. Many of the USTs were filled with sand at the time they were removed from service.

Previous Site Assessment

Numerous assessments have been completed at the Property, dating back to 1993. During previous investigations, several features of environmental concern were identified and assessed. Previous investigations performed at the Property include:

- Babbitt Heating Oil Tank Closure Documentation, US Department of Army correspondence to NDEP, April 1995.
- Preliminary Assessment Screening prepared by US Department of the Army, July 1996.
- Phase I Environmental Site Assessments, prepared by Converse Consultants, April-May 2009.

- Phase II Environmental Site Assessment, Hazardous Materials, prepared by Converse Consultants, November 2009.
- Phase II Environmental Site Assessment, Petroleum, prepared by Converse Consultants, December 2009.
- Clean-up and Reuse Plan for Hazardous Materials, prepared by Converse Consultants, April 2010.
- Phase I Environmental Site Assessments, prepared by Converse Consultants, March 2022.
- Phase II Environmental Site Assessment, Asbestos and UST Investigation, prepared by Converse Consultants, October 2022.

Based on documentation provided by the NDEP, 694 heating oil USTs were removed from the BHA in 1994-1995. The USTs were removed by DZHC in accordance with an NDEP-approved work plan (U.S. Department of the Army, January 13, 1994). Pursuant to the approved workplan, the UST removal activities consisted of the following: 1) locating each UST and noting the location on the Babbitt Map (each UST was assigned a number), 2) removing residual product from each UST tank (product removed from USTs was containerized and transported to an approved recycling facility, 3) excavating and removing USTs and transporting tanks to designated off-site disposal location, 4) inspect soil around and beneath each UST for apparent contamination. Based on the documentation provided to NDEP, no contamination was observed at any of the UST locations (U.S. Department of the Army, April 21, 1995).

Phase I ESAs (2009)

Converse conducted previous Phase I ESAs on all of the BHA parcels in 2009. The following RECs were identified in the Phase I ESA's:

Elm tree windbreaks were located on several of the parcels and some of the parcels were utilized for agricultural purposes. According to "Environmental Assessment for the Transfer of Ownership of the Babbitt Housing Area Portion of the Hawthorne Army Depot" dichloro-diphenyl-trichloroethane (DDT) and other pesticides to include organophosphates may have been used along the tree line windbreaks and agricultural areas located in the Babbitt Area therefore, this was identified as a REC.

Some trash was observed in the borrow pit located on APN006-640-18 and -19. The volume and nature of the trash could not be determined without some subsurface exploration; therefore, this was identified as a REC.

No soil sampling was conducted for the heating oil USTs that were reportedly removed from these parcels. This was identified as a REC.

The number of heating oil USTs reportedly removed from these parcels was much less than the number of buildings formerly located on these parcels. The potential presence of abandoned heating oil USTs was identified as a REC.

According to the "Preliminary Assessment Screening No. 38-EH-5034-97, Babbitt Housing Area, Hawthorne Army Depot, Hawthorne, Nevada" dated June 1996, there were electrical transformers in the BHA area that contained PCBs. These transformers were reportedly removed between 1992 to 1994, however, no soil sampling was conducted at that time. Possible historic leakage from these transformers was identified as a REC for the Property.

A former HAD employee stated that some of the former buildings located on these parcels were demolished and buried on-site in the southeastern portion of the Property. Because the houses contained lead-based paint and were covered in asbestos containing materials, the potential presence of buried building debris was identified as a REC.

Based on the Phase I ESA findings, Converse conducted two Phase II ESAs on the parcels with identified RECs in November and December of 2009. The Phase II investigations were performed to assess the safety of the soils for human use, as well as to identify any conditions that may limit future development.

Phase II – Petroleum (December 2009)

This Phase II included subsurface soil sampling and a geophysical investigation/test pit excavation to ascertain if the historical UST's have impacted the subsurface environment.

Of the 70 soil samples analyzed, only two reported petroleum compounds (i.e. 68 samples reported no detection of any constituents over the laboratory detection limits). Sample B-9 and B-28 both reported 12 ppm TPH in the oil range. These results are well below the State Action Level (SAL) of 100 ppm and are not considered to be significant. This investigation did not sample each former UST location. However, it is known that the USTs were all installed at approximately the same time and that the USTs were exposed to the same environment (i.e. soil pH and groundwater conditions). It was also reported that there were no signs of contamination during the UST removals in 1995. Therefore, since the sampling performed during this investigation is deemed representative of other UST areas that were not sampled, and that no analyses of concern were detected over the SAL, there is a high level of probability that there is no residual contamination from the historic USTs.

Based on the above findings, no additional investigation was recommended related to the historic heating oil USTs.

Phase II – Hazardous Materials (November 2009)

The Phase II ESAs consisted of the following: conducting a geophysical survey in areas where heating oil USTs were suspected to be present, excavating exploratory test pits (suspect areas identified during the geophysical survey, areas of suspect buried building debris, and in borrow pit at locations where trash was observed), advancing seventy (70) direct-push borings throughout the Property, collecting soil samples from the test pits,

boring locations along the former tree line wind breaks, and analytical testing of collected samples. Two environmental issues were identified during the Phase II Investigation:

Asbestos in soil, including small pieces of asbestos containing building debris scattered on the surface; and

Dichlorodiphenyldicloroethylene (DDE) a break down product of DDT was detected in the soil along a portion of the tree line above the Preliminary Remediation Goal (PRG) residential limit but below the PRG industrial limit.

Based on the above findings, Converse prepared a clean-up plan for the Property which included additional sampling in order to determine the vertical and horizontal extent of these contaminants of concern.

Phase I ESA (2022)

The PH I ESA identified the following recognized environmental condition (REC) in connection with the Property:

Four (4) suspect UST fill pipes were observed on the Property. The presence of apparent UST fill pipes at the locations indicate that heating oil USTs may be present at these locations. Converse recommends additional investigation (e.g. excavation of exploratory test pits) be conducted at these locations to assess for the presence of heating oil USTs on the Property. If USTs are discovered at these locations, the USTs should be removed in accordance with regulatory requirements and soil samples should be collected from below the USTs to assess for petroleum impacts.

In addition, the following observation/Business Environmental Risk (BER) were identified:

Non-friable asbestos (transite debris) was observed at several locations on the Property. Substantial quantities of transite debris were observed on the Property during previous investigations conducted by Converse (Converse, November 10, 2009). Asbestos was also detected in soil samples collected by Converse during previous investigations. It is likely that additional buried transite debris is present on the Property. Prior to any development of the Property, asbestos debris that is scattered throughout the Property should be removed.

Illegal dumped construction debris was observed on the Property (APN 006-640-19). The construction debris should be removed and transported to an approved disposal facility.

Concrete foundations, sidewalks and abandoned underground utilities associated with the former buildings are present throughout the Property.

Phase II ESA (2022)

The Phase II ESA consisted of removal of a Heating Oil UST and soil sampling. Bulk asbestos sampling, conducting an asbestos fiber soil sampling utilizing ASTM D-7521 method and a subsurface asbestos investigation of sewer piping associated with residential concrete pads.

The following asbestos containing materials and debris were identified in the areas where the historic building structures were located.

Approximately 1,600 square feet (SF) of weathered potentially friable 9"x9" floor tile located on the commercial pad located on Lexington Ave between 204th Street and 21st Street

Approximately 2,800 SF of weathered potentially friable 12" x 12" floor tile located on the commercial pad located on Lexington Ave between 204th and 21st Street.

Approximately 300 Acres of windblown friable and non-friable asbestos debris including asbestos cement siding (ACS), asbestos cement piping (ACP) weathered floor tile pieces and sewer piping material.

Subsurface Orangeburg sewer piping was likely used uniformly during construction and encased in all residential concrete pads and sewer laterals to the street sewer main. Approximately 25,000 LF

No asbestos fibers were detected in soils. One abandoned 200-gallon capacity heating oil UST was encountered. The UST was excavated and removed from the Property. No detectable concentration of Total Petroleum Hydrocarbons (TPH)was reported in the soil sample collected after removal of the UST. The illegally dumped construction debris remains a BER, however no hazardous materials were identified in the debris piles.

Summary

Based on the results of historical investigations conducted at BHA, DDE was detected in the soil along a portion of the tree line above the Preliminary Remediation Goal (PRG) residential limit but below the PRG industrial limit. Approximately 300 acres of non-friable, (weathered) asbestos debris remains scattered across the site in areas where the former residential and commercial buildings were located. Some areas of weathered asbestos floor tiles remain on commercial concrete foundations. The buildings have long since been demolished. Subsurface asbestos piping associated with the residential duplex foundations has been identified.

Project Goal

The current concept for reuse at the Site is a multi-purpose commercial and industrial center with a workforce housing component. Reuse of the Site is currently underway with an approximate 20-acre development located on former BHA parcels APN#'s 006-640-29, -30, -31, -32, -33, -34, -35, -36, -37, -38, -39, -40, -41, -42, -43, -44, and -45.

Southern Tire Mart (STM) is scheduled to commence on these parcels by early 2023. The tire business includes a 34,335 square foot (SF) commercial building which will be divided into a 2,995-SF office, 19,630 SF service bays, 6,400-SF truck service bays and 5,310 SF of covered loading docks, 2.83-acre fenced storage area, paved parking, landscaping and other site improvements. The STM will serve as an anchor for future development at the Babbitt Commercial Subdivision. STM is an existing business currently operating in Hawthorne. The existing employees will relocate to the larger facility once construction of the facility is completed, and additional employees will be added to the payroll as needed to support the expanded operations. It is anticipated that up to 10 additional jobs will be created by the new facility. In addition, there may be indirect job creation associated with the new facility. Additionally, a commercial equipment and metal recycling business (Hawthorne Metal and Equipment) recently began operation on a former BHA parcel located to the northwest of the Property.

The major hurdles to developing BHA into a viable commercial/industrial center are the asbestos debris which is scattered across much of the site and the large number concrete pads which have associated asbestos piping. DDE above the PRG residential limit must also be removed before the site can move forward with plans for a workforce housing component. These barriers to redevelopment must be removed before development can begin.

APPLICABLE REGULATIONS AND CLEANUP STANDARDS

Cleanup Oversight and Cleanup Standards

Contaminated soil encountered during Site development will be required to be managed according to NDEP regulations. In general, handling of impacted material removed during Site development will be overseen by a State of Nevada Certified Environmental Manager (CEM) and the NDEP, as necessary. Specific roles and responsibilities are as follows:

NDEP

The NDEP will be the regulatory agency overseeing the project. The NDEP has reviewed and approved the site cleanup plan.

EPA, Region 9

EPA, Region 9 is the regulatory authority for enforcing National Emission Standards for Hazardous Air Pollutants (NESHAP) air quality regulations pertaining to asbestos emissions and enforcement for construction sites in Mineral County.

Certified Environmental Manager

The CEM will have the authority to implement the site cleanup plan in areas of known DDE contamination. The CEM must be present on-site during soil characterization, excavation, and removal activities.

Licensed Asbestos Consultant

A NV OSHA Licensed Asbestos Consultant will provide project oversight and final visual inspection for all asbestos debris cleanup and asbestos abatement activities.

Cleanup Standards

Contaminated soil will be handled pursuant to the requirements of the cleanup plan, State of Nevada regulations and NDEP policy.

DDE concentration decreased rapidly as one moves from the centerline of the tree line. The samples collected at 8 feet from the tree line centerline were well below the PRGr for DDE. Based on these results, it appears that if soil was removed 5 feet from the tree centerline on both sides, it should eliminate DDE concentrations over the PRGr. The entire 5,400 feet long by 10 feet wide by 1-foot-deep area of DDE impacted soils will be remediated, the NDEP will accept the work plan to remove the soil as outlined above. The soil removal will require one week of field work. The soil can be used at the Mineral County landfill for cover. Based on these assumptions 2,000 cubic yards of material will be generated.

In all areas, Converse recommends that the asbestos containing debris be removed because non-friable material can degrade and become friable from weathering. Subsurface asbestos piping associated with the duplex foundation pads is also to be excavated and removed. There is approximately 20,000 cubic yards of concrete foundation material on-site. After excavation and demolition, the asbestos free concrete pads are to be sorted and crushed and stockpiled onsite for use as -1" aggregate base material.

For worker safety purposes, the asbestos debris removal and asbestos cement piping excavation is considered OSHA Class II work. While it is the contractor's responsibility to assure that their employees are safe at the workplace, the following guidelines should be considered during the removal of the asbestos debris:

1. Workers should be trained as required by 40 CFR 763 as Class II Worker involved in working with these non-friable materials. This requires eight hours of training.
2. Workers will require medical surveillance if they are required to wear a negative pressure respirator if exposed to asbestos over the permissible exposure limit (PEL), or have more than 30 days exposure a year.
3. Worker should wear ½ mask air purifying respirators until an exposure assessment can be conducted. If the assessment demonstrates that the worker is not exposed to asbestos over the OSHA permissible exposure limit (PEL) of 0.1 fiber per cubic centimeter (f/cc) for a 8 hour period or 1.0 f/cc for 30 minutes, respirator use can be discontinued.

4. The contractor should set up a regulated work area and a decontamination area.
5. Collected debris should be bagged, handled as asbestos containing material, and properly disposed.
6. Debris can be picked up by hand or surface soil can be scooped up with heavy equipment and the debris screened out. In either case, soil and debris must be kept wet during the removal process.
7. All debris should be removed or secured in a locked dumpster at the end of each workday.
8. Work should not be conducted if wind speed is greater than 15 miles per hour.

Applicable Laws and Regulations

With respect to the management of contaminated soils and asbestos waste generated as a result of Site development, the cleanup plan is the primary document that must be followed. In general, all federal, state, and local laws regarding contracting must be followed. All appropriate safety measures must be followed, and all appropriate permits must be obtained. These include asbestos NESHAP notification, waste manifesting, call before you dig requirements, etc.

EVALUATION OF CLEANUP ALTERNATIVES

Cleanup Alternatives Considered

This is the section that we provide an analysis of alternatives of the possible remedial options for achieving the remedial objectives using the cleanup grant funding. Mineral County has provided input on the proposed cleanup alternatives for the Site, assuming that the site will be redeveloped for retail, commercial or residential purposes. Some aspects of the cleanup alternatives are dependent on the specifics of the redevelopment plan, which is being developed, however certain general assumptions have been made to complete this evaluation. Three alternatives have been considered for the purpose of this ABCA, including:

Alternative No. 1: No action

Alternative No. 2: Removal of the asbestos debris and abatement of the sub-surface asbestos piping

Alternative No. 3: Removal of the asbestos debris, abatement of the sub-surface asbestos piping and removal of DDE contaminated soils via excavation and off-site disposal

Evaluation criteria include effectiveness, implementation, and cost. The evaluation for effectiveness considers the appropriateness of the alternative with respect to long and short-term satisfaction of cleanup goals and comprehensiveness in terms of protection to

human and environmental health and safety. Implementation addresses the technical and administrative feasibility of the remedial alternative. Cost evaluations address the short and long-term costs associated with remedy implementation.

Evaluation of Cleanup Alternatives

To satisfy EPA requirements, the effectiveness, feasibility, and cost of each of the three alternatives has been evaluated.

Effectiveness

Alternative 1: No Action is not considered an effective alternative as the very nature of Site development will result in excavation, and impacted material is anticipated to be encountered. This alternative does not include a means for mitigating exposure to identified hazardous materials or contaminated soils and is not protective of human health or the environment. The no action alternative is not recommended as it is not compatible with regulatory requirements and will impede future redevelopment of the Property.

Alternative 2: Removal of the asbestos debris and abatement of the sub-surface asbestos piping only is not considered an effective alternative for the site. The ACM abatement alternative includes removal and disposal of all ACM from the Property but does not address DDE contaminated soils. This option is required by regulation prior to any renovation or demolition activity that will disturb ACM. This option would be effective at reducing exposure risks from asbestos building materials; however, it would not be effective at reducing risks associated with DDT contamination in soil and would limit development at the site to Industrial development excluding any workforce housing component. This is not a desired option

Alternative 3: Removal of the asbestos debris, abatement of the sub-surface asbestos piping and removal of DDE contaminated soils via excavation and off-site disposal is considered the most effective alternative. Not only will this be the quickest way to remove contaminants, but it will also allow immediate development of the Site which is the ultimate goal. Source removal is often considered the most effective form of remediation. It greatly reduces long term risk. In addition, this option will allow for residential construction to occur on-site which is a major goal for reuse.

Implementation

Alternative 1: No action is an easy alternative to implement as no activities will be conducted.

Alternative 2: Removal of the asbestos debris and abatement of the sub-surface asbestos piping only would be easily implemented, however would not address the DDE contaminated soils.

Alternative 3: Removal of asbestos debris, abatement of sub-surface asbestos piping and removal of DDE contaminated soils via excavation and offsite disposal (at the Mineral County Landfill) is an easily implemented alternative as the excavation activities will need to be planned in relation to Site development activities.

Cost

Cost estimates for implementation of each alternative are provided below.

Alternative 1: There would be no cost for implementation of Alternative 1. However, there would be negative effects as this would mean there would be no development of the Site. This would result in a loss of potential benefits to the community such as property tax revenue and added jobs.

Alternative 2: Costs for removal of the asbestos debris and abatement of the sub-surface asbestos piping including crushing of clean concrete onsite are estimated at $1,000,000.00. Costs include worker asbestos training, removal of the asbestos debris, demolition and crushing of the concrete pads, project oversight, asbestos disposal, temporary fencing, site stabilization and final reporting. There is approximately 20,000 cubic yards of concrete material that needs to be demolished, crushed, and stockpiled. Project oversight by a licensed asbestos consultant during the asbestos debris cleanup and asbestos abatement work are estimated at $120,000.000.

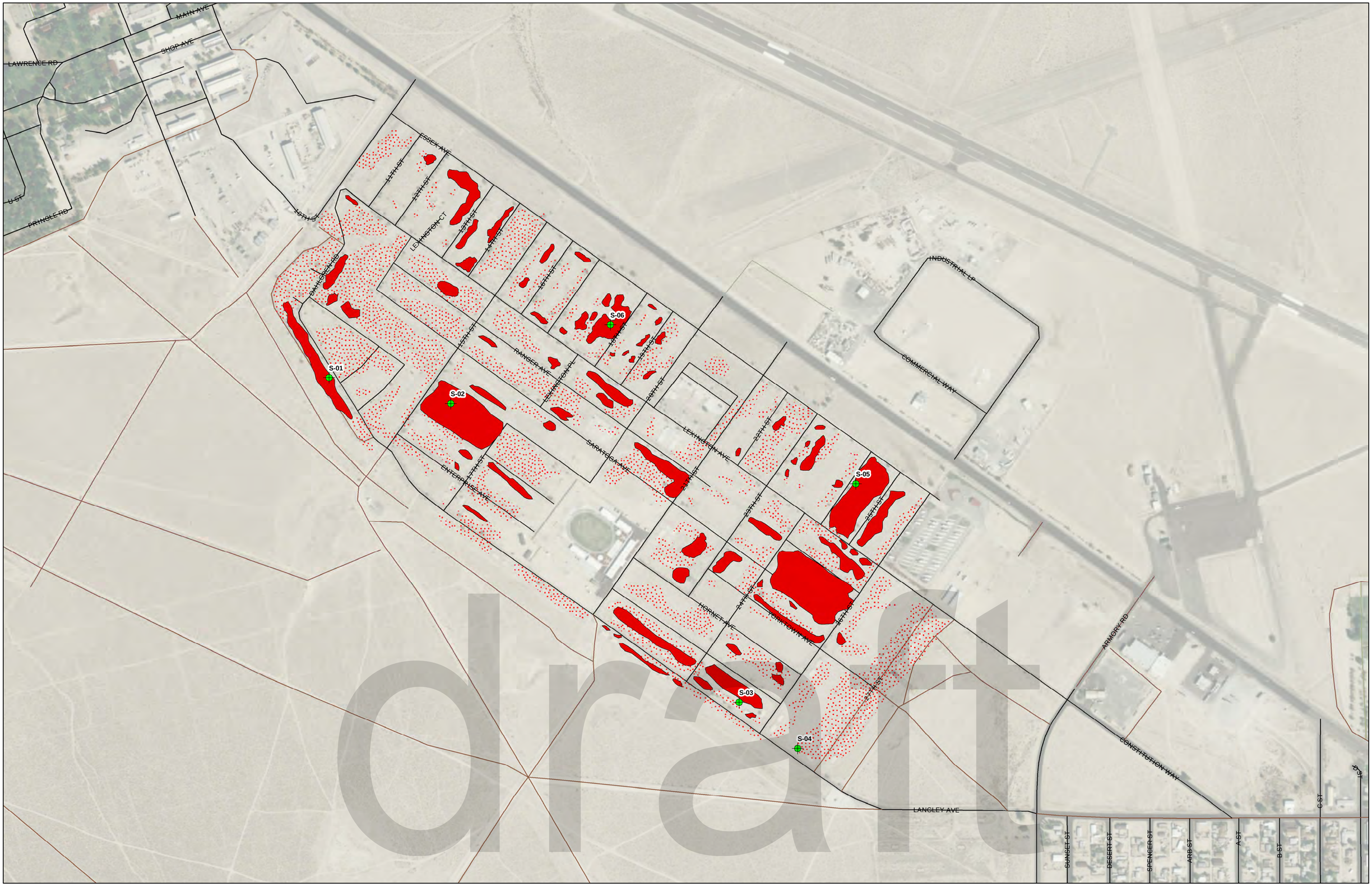
Alternative 3: For this alternative, Costs for removal of the asbestos debris and abatement of the sub-surface asbestos piping including crushing of clean concrete on-site are estimated at $1,000,000.00. Costs include worker training, removal of the asbestos debris, demolition, and crushing of the concrete pads, project oversight, asbestos disposal, temporary fencing, and site stabilization. There is approximately 20,000 cubic yards of concrete material that needs to be demolished, crushed, and stockpiled. In addition to the asbestos removal, this alternative includes the remediation of DDE concentrations over the PRGr. The entire 5,400 feet long by 10 feet wide by 1-foot-deep area of DDE impacted soils will be remediated. The soil can be used at the Mineral County landfill for cover. Based on these assumptions 2,000 cubic yards of impacted soil material will be generated. Costs for the DDE remediation are estimated at approximately $300,000.00. This estimate includes costs for soil export and disposal. CEM project oversight during the DDE soil remediation and project oversight by a licensed asbestos consultant during the asbestos debris cleanup and asbestos abatement are estimated at $150,000.000.

Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative 3: Removal of asbestos debris, abatement of sub-surface asbestos piping and removal of DDE contaminated soils via excavation and off-site disposal. This is recommended because it is the only alternative that will immediately allow for the goal of a comprehensive site cleanup which includes residential and industrial/commercial redevelopment. Site redevelopment will create jobs

and provide a boost to the economy, result in the excavated material being taken to the Mineral County landfill for use as cover material, and provide stockpiled clean -1" aggregate for use during future construction. Based on these reasons, Alternative 3: Removal of asbestos debris, abatement of sub-surface asbestos piping and removal of DDE contaminated soils via excavation and off-site disposal is the recommended alternative.

CONVERSE CONSULTANTS



SITE MAP
Asbestos Surface Debris
Hawthorne
Mineral County, NV

Date Created: 09/18/2009 Project No: 07-23151-04-05

Babbitt Parcels Phase 2 Asbestos.mxd

N W E S

1 inch = 400 feet

0 200 400 800 1,200 1,600 2,000 Feet

Legend

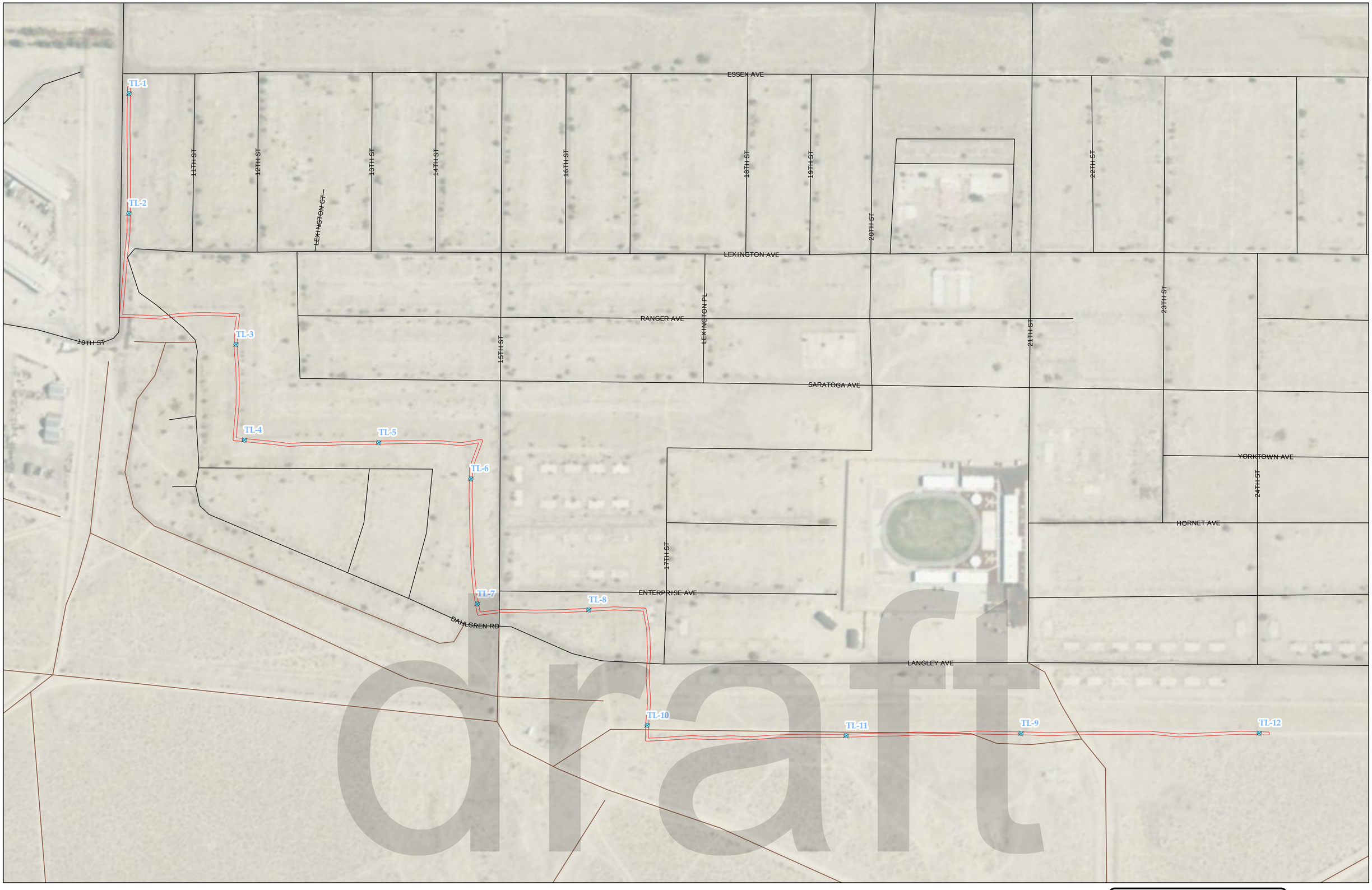
- Asbestos Sample Locations
- Heavy Concentration of Transite Siding
- Scattered Transite Siding

Mineral County Roads

- NOT SPECIFIED
- DIRT
- GRADE AND DRAIN
- NON-PAVED
- PAVED

Plate 3

CONVERSE CONSULTANTS



DDE CONTAMINATION

Hawthorne
Mineral County, NV

Date Created: 04/14/10 Project No: 07-23151-04-05

1 inch = 200 feet

0 100 200 400 600 800 1,000 Feet

Legend

- Surface Sample Locations
- Contaminated Soil

Mineral County Roads

- NOT SPECIFIED
- DIRT
- GRADE AND DRAIN
- NON-PAVED
- PAVED

Plate2

Babbitt Parcels Phase 2 DDE Contamination.mxd