

WYOMING DEPARTMENT OF ENVIRONMENTAL
QUALITY

VOLUNTARY REMEDIATION PROGRAM

PUBLIC PARTICIPATION PLAN

FORMER ACME POWER PLANT, WYOMING

VRP Site No. 58.220

PREPARED FOR:

WDEQ/VRP and
Sheridan County Conservation District

PREPARED BY:

WWC Engineering and
Confluence Collaborative



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1.0 INTRODUCTION

WWC Engineering and Confluence Collaborative have prepared this Public Participation Plan (PPP) for the former Acme Power Plant (the Site) located near Sheridan, Wyoming, to encourage engagement and inform the public of the Site's progress with the Voluntary Remediation Program (VRP).

The PPP has been prepared to facilitate effective communication between the current Site owner, the Sheridan County Conservation District (SCCD), and interested stakeholders regarding VRP activities. Specific objectives of this PPP include:

- Documenting and maintaining communication channels for disseminating Site information and sharing community expectations, interests, and concerns regarding the Site;
- Documenting and maintaining a framework for incorporating public feedback into VRP activities at the Site; and
- Developing and maintaining a comprehensive source of information about Site conditions, activities, and the VRP process.

The Wyoming Department of Environmental Quality, Solid and Hazardous Waste Program, Voluntary Remediation Program (WDEQ/VRP) determined that a PPP is required due to a request from an interested stakeholder to prepare a PPP and due to the significant public interest in the project.

This PPP has been prepared to satisfy applicable statutes and WDEQ/VRP fact sheets, including Wyoming Statute 35-11-1604 and WDEQ/VRP Fact Sheet #2¹.

2.0 SITE DESCRIPTION AND PROJECT HISTORY

2.1 SITE HISTORY

Located on the banks of the Tongue River north of Sheridan, Wyoming, the former Acme Power Plant (the Plant) was constructed in 1910 to provide coal-fired power to local mines, coal camps, and the City of Sheridan. The Sheridan County Electric Company operated the Plant from 1911 until 1947, when it sold the Plant to Montana-Dakota Utilities (MDU). MDU operated the Plant until 1976. After its closure in 1976, MDU sold the Site to Carl Weissman and Sons for salvage and recycling activities. Perkins Power purchased the Site in 1984 with the intention of operating the Plant and using the steam to heat a 2-acre greenhouse for growing lettuce hydroponically. This and other proposed uses did not materialize during the 1980s or 1990s. Several deed transfers occurred in the early 1990s. In 2000, salvage rights were assigned to a private individual, and in 2008, the Site was approved for auto salvage operations by the Sheridan Board of County Commissioners. In October 2015 through January 2017, the Sheridan Community Land Trust worked through property ownership issues with assistance from SCCD and The Nature Conservancy. The Sheridan County Conservation District assumed ownership of the Site in June

¹ WDEQ/VRP Fact Sheet #2, Public Participation, October 2011: <http://deq.wyoming.gov/shwd/voluntary-remediation-program/resources/fact-sheets/>.

2017 following resolution of title issues and completion of initial Phase I Environmental Site Assessments (ESAs).

The 5.8-acre Site includes the Plant and several other buildings known as the barn, maintenance shop, trailer house, and little house. The Tongue River bisects the Site. The Plant and other buildings are on the south side of the river. North of the river is a fly ash pile, most of which is on a contiguous property. Areas around the Site are frequently used for recreational activities such as hunting, fishing, and floating.

Figure 1 provides a map showing the location of the Site, including the surface ownership, contiguous properties (i.e., those that are touching the Site), and other nearby properties.

2.2 VRP HISTORY

SCCD applied to the U.S. Environmental Protection Agency (EPA) Targeted Brownfield Assessment Program in June 2016. In 2016 and 2017, contractors for the EPA conducted initial Environmental Site Assessments (Phase I and II ESAs) through the EPA Targeted Brownfields Assessment Program. A brownfield site is real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. The ESAs confirmed hazardous substance and petroleum hydrocarbon impacts at the Site including multiple areas of drums with used oil and other substances, abandoned buildings contaminated with asbestos and lead-based paint, and soil, sediment, and groundwater contamination.

In January 2018, the Site was enrolled in the WDEQ/VRP. This program provides guidance throughout the process so that a liability assurance can be issued when remediation is complete. Being enrolled in the program provides multiple options for remediation, depending on specific future uses. WDEQ/VRP posted a public notice of voluntary cleanup, providing any interested party with the opportunity to request development of a PPP. The public notice was posted on the WDEQ website and published in the Sheridan Press on January 24 and 31 and February 7 and 14, 2018.

In March 2018, WDEQ/VRP received a request to prepare a PPP from the Powder River Basin Resource Council, citing significant public interest and great recreational opportunities along the Tongue River. In response to the request and due to the significant public interest in the project, WDEQ/VRP determined that a PPP would be prepared.

In March 2018, WDEQ/VRP selected WWC Engineering to assist WDEQ/VRP and the SCCD with site stabilization/hazard mitigation activities. These are described under Section 3.2.

In September 2018, WDEQ/VRP, in collaboration with SCCD, was awarded an EPA brownfields assessment grant to conduct a site assessment and characterization of the Site. Grant funds also will be used to conduct cleanup planning and support community engagement and public involvement activities. Brownfield assessment grant activities are described under Section 3.2.

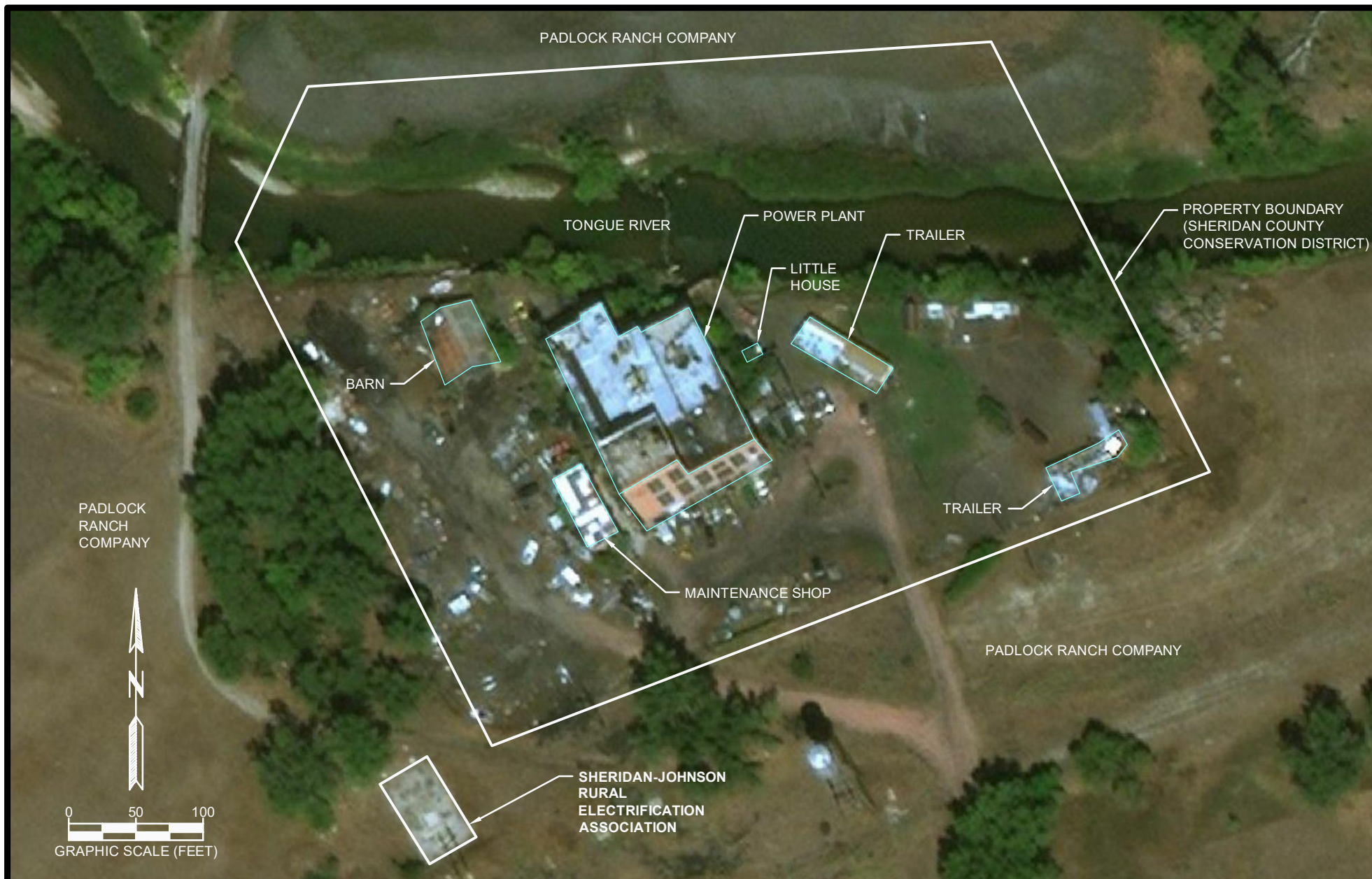


FIGURE 1. SITE LOCATION AND OWNERSHIP

DESIGNED BY:  **WWC** ENGINEERING

3.0 SITE ASSESSMENT AND REMEDIATION PROCESS

The following sections describe work completed at the Site, planned activities under the site stabilization/hazard mitigation phase of work, site assessment and cleanup planning under the EPA brownfields assessment grant, and future activities that will need to be completed before remediation is complete.

3.1 COMPLETED ACTIVITIES

After the SCCD applied to the EPA Targeted Brownfields Assessment Program, EPA tasked the Weston Solutions, Inc. (Weston) Superfund Technical Assessment and Response Team (START) to assist EPA in conducting three Environmental Site Assessments (ESAs) at the Site. The purpose of the Phase I ESA was to identify (1) recognized environmental conditions, (2) recognized physical conditions of buildings and adjacent grounds, and (3) recognized present operational practices. The Phase I ESA involved readily available records review, a site reconnaissance, and interviews with two former partial owners and one of the owners of the Padlock Ranch, which owns the land contiguous to the Site. The Phase I ESA site investigation and interviews were conducted in December 2016, and the Phase I ESA report was completed in January 2017². The report documented six recognized environmental conditions:

- Stained surface soils and stressed vegetation;
- Multiple areas of 55-gallon drum storage, including many unlabeled drums;
- Undocumented car crushing and battery recycling activities;
- Transformer spill of oil containing polychlorinated biphenyls (PCB);
- Coal ash pile; and
- Historic coal-fired power plant operations with the potential for coal and coal byproducts.

Based on recommendations from the Phase I ESA, Weston completed a Phase II ESA focusing on soil, groundwater, surface water, and sediments outside the buildings. Weston sampled surface soils, subsurface soils, groundwater, Tongue River sediments, and the coal ash pile. They also classified the contents of about half of the drums. The findings are documented in the Phase II ESA report completed in October 2017³. The report identified contaminants of concern (COCs) based on sampling results. These included:

- Petroleum hydrocarbons, PCBs, heavy metals, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs) in surface soils;
- One metal (iron), two VOCs (tetrachloroethene [PCE] and benzene), and PAHs in subsurface soils;
- One VOC (PCE), a pesticide (hexachlorobenzene), and heavy metals in groundwater;
- Petroleum hydrocarbons and heavy metals in Tongue River sediment;

² Weston Solutions, Inc., Phase I ESA for Acme Power Plant, January 4, 2017.

³ Weston Solutions, Inc., Phase II ESA for Acme Power Plant, October 2017.

- Petroleum hydrocarbons, PCBs, PAHs, and heavy metals from sediments within the Plant;
- Although heavy metals were detected in the coal ash pile, the report concluded that any leachate from the coal ash pile would not impact groundwater above regulatory standards; and
- Used oil is the primary material stored in the drums, based on sample results from 30 of 33 drums accessible to be screened.

Weston also completed a separate Phase II ESA focusing on hazardous building materials. The findings are documented in the Phase II Hazardous Building Materials ESA report completed in October 2017⁴. The report identified COCs within the various buildings based on sampling results. These included:

- Asbestos-containing material (ACM) in the Plant, barn, maintenance shop, little house, and exterior soils;
- Lead-based paint in the Plant, barn, maintenance shop, trailer, and little house;
- Potential PCB-containing light ballasts in the barn and maintenance shop;
- PCB-containing electrical equipment and PCB contamination in sediments and concrete in the Plant;
- One mercury thermostat in the trailer; and
- Mold throughout the Plant and barn.

3.2 PLANNED ACTIVITIES

Site Stabilization/Hazard Mitigation

The current phase of work at the Site includes site stabilization/hazard mitigation activities. These activities are designed to reduce or eliminate specific hazards and stabilize the Site for future site assessment and salvage of materials outside the buildings. Site stabilization/hazard mitigation activities that have been or are planned to be completed in October through December 2018 include:

- Removal of bulk and loose ACM outside and inside buildings;
- Sampling and disposal of drums, buckets, and other containers; and
- Sampling potential PCB-containing equipment and sediments.

All activities will be completed under a Work Plan that will be reviewed and approved by WDEQ/VRP. The first step will involve removal of ACM and presumed asbestos-containing materials (PACM) along the access route to the drum storage areas. These materials include a plastic tote of pipe insulation near the main access route and various gaskets and packing materials outside the buildings. This material will be wetted and collected in air-tight and puncture

⁴ Weston Solutions, Inc., Phase II ESA for Acme Power Plant, Hazardous Building Materials, October 2017.

resistant plastic bags. The bags will be placed in a plastic-lined dumpster and transported to an appropriately permitted landfill.

The second step will involve gathering drums and other containers to one readily accessible location and screening them to determine the contents. Trained technicians will perform field screening and collect samples for laboratory analysis. Field screening and sampling results will supplement those in the Phase II ESA to characterize the contents of all drums, buckets, and other containers for waste disposal purposes. The containers will be hauled and disposed offsite following full characterization.

During the third step, remaining bulk and loose ACM and PACM will be removed outside and inside of buildings. This will include all confirmed ACM (i.e., materials in original packaging/boxes/buckets as well as any obvious bulk asbestos in and around the immediate area and other materials confirmed to contain more than 1% asbestos based on laboratory analysis) in the barn, maintenance shop, and little house. Due to the large quantity of ACM in the Plant and ongoing degradation of asbestos-containing pipe insulation and other materials, waste asbestos removal within the Plant will be limited to a storage area for pipe insulation and other materials. This is consistent with the scope of the site stabilization/hazard mitigation phase of work, which does not include abatement of the buildings and equipment where asbestos is present.

The fourth step of the site stabilization/hazard mitigation process will involve sampling equipment, concrete, and soils/sediment for PCBs. Oil samples and wipe samples will be collected from transformers and other potential PCB-containing equipment, and destructive samples will be used for concrete. Soil and sediment samples may be collected inside or outside of the Plant. Sample results will supplement those contained in the Phase II Hazardous Building Materials ESA. Certain PCB-containing equipment may be disposed of during site stabilization. PCB-containing oils (if discovered) may be hauled and disposed with the drums. Potential PCB-containing ballasts discovered during the Phase II Hazardous Building Materials ESA may be disposed of during the site stabilization process with other hazardous materials. Large equipment such as transformers, conveyors, and compressors discovered to contain PCBs will be delineated but left in place pending future remediation.

Site security issues will also be addressed during this phase of work. During WWC's initial site visit on August 30, 2018, it was noted that doorways to the Plant are not secured and that there is evidence of trespassing within the Site fence. Site security and public safety will be enhanced by boarding and/or locking doorways to the Plant, closing or boarding windows, and posting signs warning of the dangers of asbestos.

Site Assessment, Ecological Risk Assessment, and Remedial Alternatives Evaluation

Following site stabilization/hazard mitigation, the next phase of planned work will involve additional site assessment activities outside the buildings, ecological risk assessment, and evaluation of remedial alternatives. Work will be conducted under the 2018 EPA brownfield assessment grant. Future assessment and remediation of building interiors will be completed using additional grants in upcoming phases. A contract with an environmental contractor to complete the site assessment outside the buildings has not been finalized at this time. Planned site assessment activities outside the buildings include:

- Activity-based sampling to determine the potential human exposure to asbestos contained in outdoor soil due to future soil disturbing activities;

- Soil boring and soil sampling to determine the horizontal and vertical extents of contamination in Site soils;
- Monitor well installation and groundwater sampling to determine the distribution and seasonal variation in groundwater contaminants;
- Surface water sampling to determine the distribution and seasonal variation in surface water contaminants; and
- Sediment sampling to map potential contaminant transport pathways from the Plant and other facilities.

All site assessment activities will be conducted under a Work Plan that will be reviewed and approved by WDEQ/VRP. They will also be coordinated with prior sampling activities to avoid duplication and maximize efficiency. For example, biased soil borings are planned in areas with previously identified contamination, whereas grid samples will be spaced farther apart in areas of the Site suspected to contain little contamination.

This phase of work will also include an ecological risk assessment. The purpose of the assessment is to determine whether plants, invertebrates (insects, spiders, etc.), fish, or wildlife (ecological receptors) are likely to be affected by chemical, physical, or biological stresses related to Site contamination. The risk assessment will be carried out in phases, beginning with a simple exclusion assessment designed to identify sites where ecological receptors are unlikely to be affected. Pending the results of the exclusion assessment, the next step is a scoping assessment, which requires more evaluation of the Site and potential ecological receptors at or near the Site. The scoping assessment will determine whether the exposure of ecological receptors to Site-related chemicals is likely and whether the Site should undergo a more complex risk assessment. Pending the results of the scoping assessment, the next step is a screening assessment. This involves a comparison of Site-related chemical concentrations to contaminant concentrations that are considered to be safe for plants, invertebrates, fish, and wildlife.

The final planned phase of work is development of a remedial alternatives evaluation report. Under this task, potential remedies and estimated costs are evaluated for the media investigated under the site assessment, including soils, groundwater, sediments, and surface water. Estimated costs for the remediation of the buildings will be prepared following future assessment and cleanup efforts of the buildings. All remedies must meet four standards under Wyoming Statute 35-11-1605(a):

- They must protect human health, safety, and the environment.
- They must remediate contaminated air, soil, and water (as necessary) to attain applicable cleanup levels established under Federal or State law or regulation or to attain site-specific, risk-based cleanup levels developed for the Site.
- They must control any sources of releases so as to reduce or eliminate, to the extent technically practicable, further releases as required to protect human health and the environment.
- They must comply with any applicable standard for management of wastes generated as a consequence of the remedy.

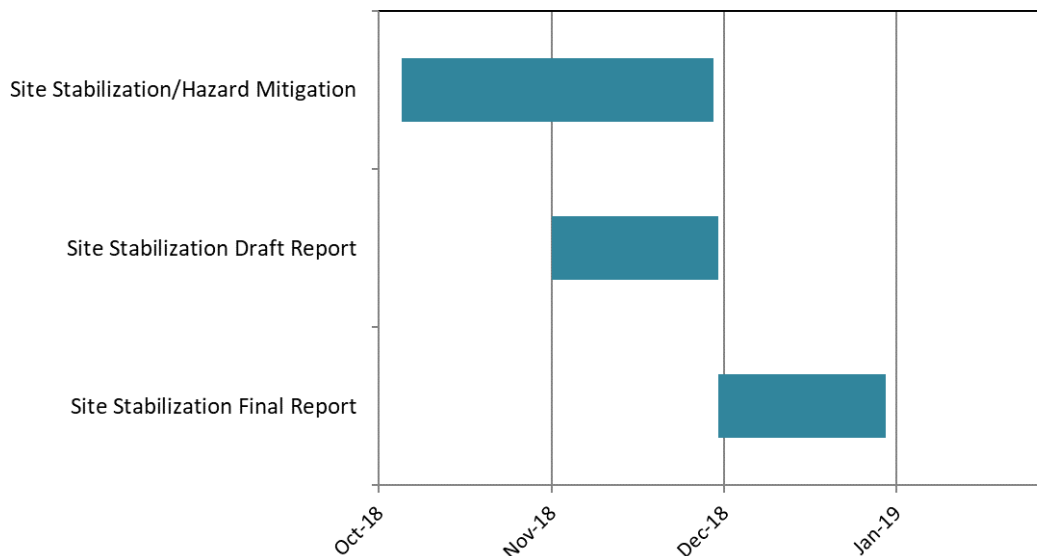
3.3 FUTURE ACTIVITIES

The scope and schedule of future activities after those described in the previous section will depend on the results of additional site assessment, ecological risk assessment, remedial alternative evaluation, and specific future uses of the site. Generally, the final steps in the VRP process include:

- Remedy selection for environmental media
- Remedy agreement
- Remedy implementation (including construction and start-up of the remedy, monitoring of remediation progress, and remedy progress reports to WDEQ)
- Sampling and analysis to confirm that cleanup levels are achieved at points of compliance
- Certificate of completion

3.4 SCHEDULE

Currently planned activities are scheduled to conclude by December 2018, as depicted in the following chart:



4.0 PUBLIC INVOLVEMENT ACTIVITIES

The specific objectives of public involvement for the Site described herein include the following:

- Informing the community of VRP plans and activities for the Site;
- Facilitating public interaction regarding Site VRP activities; and
- Responding effectively to public requests for information.

4.1 LOCAL INVOLVEMENT

The SCCD has facilitated substantial public involvement efforts around Site activities, and this PPP is not intended to duplicate or replace efforts already completed. One significant public involvement milestone was the Community Visioning Session conducted on August 24, 2017. The workshop was attended by 56 members of the community, 6 representatives of local and state stakeholders, 3 facilitators with the Kansas State University Technical Assistance to Brownfields (TAB) Program, and 1 representative of EPA Region 8.

A summary report from the Community Visioning Session is provided as Attachment 1 to this PPP. The report describes how participants were presented with a history of the Site, expectations for future use, and a description of the planning and visioning process. Participants then performed a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis, which created a basis for brainstorming redevelopment ideas. Participants heavily favored uses that included some sort of outdoor recreation and an appreciation of the area history. The Community Visioning Session provided valuable insight into potential partnerships, community priorities, and potential future uses for the property. The summary report identified three expectations that must be maintained for future uses of the Site:

- Protect Land & Water Quality
- Ensure Public Access & Use
- Capture the Historical Importance

Another public involvement milestone facilitated by SCCD is the formation of the Acme Working Group. Formed in December 2017, the Acme Working Group serves in an advisory capacity to the SCCD. The current purpose is to provide input and assistance for the technical aspects of cleanup; the group may be expanded to include other interests as the project transitions into future use planning. The Acme Working Group consists of the following members:

- SCCD
- Sheridan Community Land Trust
- The Nature Conservancy
- Sheridan County
- Wyoming Game and Fish Department
- Sheridan Travel and Tourism
- Padlock Ranch (the contiguous landowner to the Site)
- Montana Dakota Utilities
- Sheridan County Historical Society and Museum

The Acme Working Group has developed a project website (see Section 4.9) and a fact sheet describing project activities through February 2018. The fact sheet is provided in Attachment 2. It describes the current Site conditions, the project vision, investment, next steps, and description of the Acme Working Group. Fact sheets will be updated upon completion of project milestones.

4.2 PROJECT MAILING LIST

The SCCD maintains a list of approximately 1,300 persons who have expressed interest in receiving public information materials related to SCCD projects and initiatives. Notifications and updates will continue to be provided through existing SCCD publications. Additional recipients may be added to the list by contacting the SCCD directly.

4.3 PUBLIC INFORMATION REPOSITORIES

Documents associated with the Site will be available for public review at the following locations during the hours listed below:

Sheridan County Fulmer Public Library

335 W. Alger St.
Sheridan, WY 82801
Hours: Monday through Thursday 9 a.m. - 9 p.m.
Friday and Saturday 9 a.m. - 5 p.m.

Tongue River Branch Library

145 Coffeen Street
P.O. Box 909
Ranchester, WY 82839
Hours: Monday through Friday 10 a.m. - 12 p.m. and 1 p.m. - 6 p.m.

Sheridan County Conservation District

1949 Sugarland Drive, Suite 102
Sheridan, WY 82801
Hours: Monday through Thursday 8:30 a.m. - 2:30 p.m.

Documents will be made available digitally on the project website at:

<https://www.acmeprojectwyoming.org>

4.4 DESIGNATED PROJECT CONTACTS

At least one designated project contact will be listed on public information materials to provide a point of contact for public inquiries. The designated project contacts for public inquiries are:

Carrie Rogaczewski
District Manager
Sheridan County Conservation District
<https://www.sccdwy.org/>
(307) 672-5820 x 3
carrie.rogaczewski@sccdwy.org

Benjamin Luckey
Voluntary Remediation Program
Project Manager
Wyoming Dept of Environmental Quality
200 W. 17th Street, 2nd Floor
Cheyenne, WY 82002
(307) 777-6186
benjamin.luckey@wyo.gov

4.5 PUBLIC MEETINGS

The SCCD will host periodic public meetings to inform the public of the progress of remediation activities, discuss pertinent documents related to the VRP effort, and obtain input regarding redevelopment alternatives. Additional public meetings may be held during the cleanup and redevelopment of this Site if public interest warrants and at appropriate project milestones.

These meetings will serve to heighten public awareness of VRP cleanup actions completed, provide an opportunity for community members to understand the information in documents presented for public comment by interacting with SCCD, WDEQ, and WWC representatives, and to obtain input from the community regarding redevelopment.

4.6 PUBLIC COMMENT PERIOD

Documents subject to public comment will be placed at the above-mentioned repositories and made available on the project website (see Section 4.9). Public notices will be issued to specify commenting instructions and deadlines.

Based on the feedback received from the public, changes may be incorporated into the document to accommodate public concerns.

4.7 PUBLIC NOTICE OF AVAILABLE COMMENT PERIODS OR PUBLIC MEETINGS

A notice will be placed in The Sheridan Press newspaper in advance of any public meeting to notify the public of time, place, and subject of the meeting. A notice will also be placed on the project website and may be placed in The Sheridan Press to alert the public when documents ready for public review have been placed in the repositories referenced in Section 4.3 above.

4.8 PROJECT STATUS UPDATES

The SCCD distributes semiannual newsletters to the mailing list referenced in Section 4.2. Annual watershed newsletters are distributed to all postal residents within the Tongue River, Goose Creek, and Prairie Dog Creek watersheds. Additionally, SCCD publishes an annual report, which is distributed throughout the county as an insert to the Sheridan Press. SCCD will include in those newsletters and annual reports summaries of the various VRP activities undertaken at the Site, a list of proposed near-term work to be conducted at the Site, dates and times of upcoming public meetings and public comment opportunities, and a list of the documents filed in the repositories.

Project updates will be also be disseminated to local media outlets in the form of media releases. Project announcements and updated fact sheets will also be included on the project website as appropriate milestones are completed.

4.9 PROJECT WEBSITE

The SCCD maintains an existing project website: <https://www.acmeprojectwyoming.org>. The website contains comprehensive information about the history of the Site, the vision for Site restoration, project updates, a donation link, and information on the Acme Working Group. The website also features a form by which visitors may ask to be added to the project mailing list or submit stories, repurpose ideas, comments or questions. Website content will be expanded as needed to include information about planned VRP activities, opportunities for public participation, project phasing, and project schedule. Digital and printable comment forms will invite public input.

4.10 SOCIAL MEDIA

Social media messaging will be developed and posted periodically to the SCCD Facebook page to share information about planned VRP activities, encourage public participation, and drive interested persons to the project website for further information. Messaging will also be provided

to key project partners such as the members of the Acme Working Group for dissemination through partner social media channels.

4.11 SITE TOURS

Site tours may be organized to give members of the public and/or the media a chance to observe progress at the Site. The SCCD will coordinate any such site tours for outreach or planning purposes. The tours will be conducted outside the fence for the protection of the tour attendees and to prevent spreading contamination. Due to the hazards present at the Site, only trained personnel with proper protective equipment will be allowed to enter the fenced area. The public shall not visit the Site without supervision or enter the fenced area. The Site and the contiguous property are private. Those visiting the Site without permission or supervision will be trespassing.

5.0 CONCLUSIONS

This PPP is intended to accomplish the following goals:

- Keep the public informed about the progress of this VRP project and enable the community to understand the purpose, scope, and results of the remedial efforts.
- Strengthen the SCCD-public partnership to encourage meaningful community participation in the VRP process.
- Provide a broad range of communication methods and guidance for dissemination of project information to the public.

This PPP will be reviewed and revised upon request from WDEQ or as necessary to improve public participation in the VRP process.

ATTACHMENT 1

August 2017 Community Visioning Report



Acme Power Plant Reclamation Project Community Visioning Session August 24th, 2017

**Acme Power Plant Reclamation Project
Community Visioning Session Report
August 24th, 2017
Sheridan Memorial Hospital Conference Center**

TAB Partners:



Local Partners:



Site Background:

Located near the banks of the Tongue River outside of Sheridan, Wyoming, the Acme Power Plant was completed in 1910, and provided power to the local mines, coal camps, and the City of Sheridan. As the mining industry changed and the City of Sheridan grew, the power plant became obsolete and shut down in the late 1970s. Since then, it has been the site of several different industrial uses, including auto dismantling, and battery disposal. The site has been unoccupied for the past few years; it was purchased in June 2017 by the Sheridan County Conservation District. (source: The Sheridan Press)



Top: Acme Power Plant, ca. 1950s

Photo Credit: Diers Collection | The Wyoming Room

Bottom: Acme Power Plant, ca. 1913

Photo Credit: Sheridan Area Coal Camp Photos | Wyoming Tails and Trails



Environmental Issues:

A Phase II Environmental Assessment is being completed for the site. Preliminary results, as of the August 24th, 2017 meeting date, indicate that some level of cleanup will be needed to address debris, drums, asbestos, and other contaminants at the site.

Acme site, present day

Photo Credit: Chelsea Coli | The Sheridan Press

Workshop:

Held in the conference room of the Sheridan Memorial Hospital on the evening of August 24th, 2017, the visioning workshop was attended by 56 members of the community. In addition to community members, there were six representatives of local and state stakeholders, three facilitators with the Kansas State University (KSU) Technical Assistance to Brownfields (TAB) Program, and one representative of US EPA Region 8.

Workshop Presentations **Photo Credit:** Blase Leven, KSU TAB



The workshop host, Carrie Rogaczewski (Sheridan County Conservation District or SCCD) began the conference with a brief presentation about the former Acme Power Plant, the history of the site, and the expectations for future use, followed by presentations by Blase Leven and Mary Hashem (KSU TAB facilitators) on the planning and visioning process to be used. After the presentations, the participants began the re-use visioning process.

Community participants were generally seated at seven (7) tables of eight (8) participants each. Each group received a flip chart with the first two pages labeled with their group number and sections for each category for a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis. The SWOT analysis was used to evaluate the site in each of the four categories, which creates a base for brainstorming redevelopment ideas. The groups also received handouts including a color aerial photograph of the Acme Power Plant site and questions to stimulate discussion.

Following the presentations, the participants were given an hour to work through the SWOT analysis at their table and note their findings on their group's flip chart. At the end of the hour, an appointed spokesperson for the group reported out on their findings. As part of the report-out, they were directed to identify the top three re-use opportunities for later voting. When all reports were complete, the participants moved into the next room to vote on their preferred site re-use opportunities. At the end of the voting, facilitator Blase Leven summarized the results of the voting based on a visual review of the votes and informal tallying.



Left: Acme site, Present Day;
Right: Participants work in groups to analyze strengths, weaknesses, opportunities, and threats

Photo Credit (left): Blase Leven, KSU TAB Program
Photo Credit (right): Mary Hashem, Adaapta

Expectations for Future Use:

1) Ensure Public Use/Access

2) Capture Historical Importance

3) Protect Land and Water Quality

Potential Participants and Stakeholders:

Each visioning workshop participant was asked to identify themselves based on their relationship to the project site, as well as their professional affiliation, if applicable. This information was summarized by KSU TAB and provided to the SCCD to help identify those particularly suited to help achieve certain goals. Attendees were also asked to identify other stakeholders who could possibly serve on an advisory committee. The listing of stakeholders is included below.

Potential Stakeholders Identified:

- | | | |
|--------------------------|------------------------------|------------------------|
| • Padlock Ranch | • Ramaco | • Audobon Society |
| • Big Horn Coal | • Trout Unlimited | • Landowner Rep |
| • History Museum | • Tongue River Fire District | • Former Residents |
| • Montana Dakota Utility | • Tongue River Women's Club | • County Commissioners |
| • Wyoming Room | • Game and Fish | • Pheasants Forever |
-

Strengths, Weaknesses, Opportunities, and Threats (SWOT) Analysis:

For the SWOT analysis, each group was tasked with identifying the strengths and weaknesses of the community as a whole, as well as the opportunities and threats unique to the site. While each team came up with their own list of strengths and weaknesses, they generally fell under one of four broader categories: *Local Community/History, Recreation, Economic Opportunity, and Accessibility*.

Generally, participants were more likely to see the community's current and historical community aspects and recreation opportunities as a strength, while economic opportunity and accessibility issues were more likely to be viewed as weaknesses. Lists of strengths and weaknesses are shown on the next page; while these lists are not exhaustive, they are a representation of the ideas presented during the workshop.

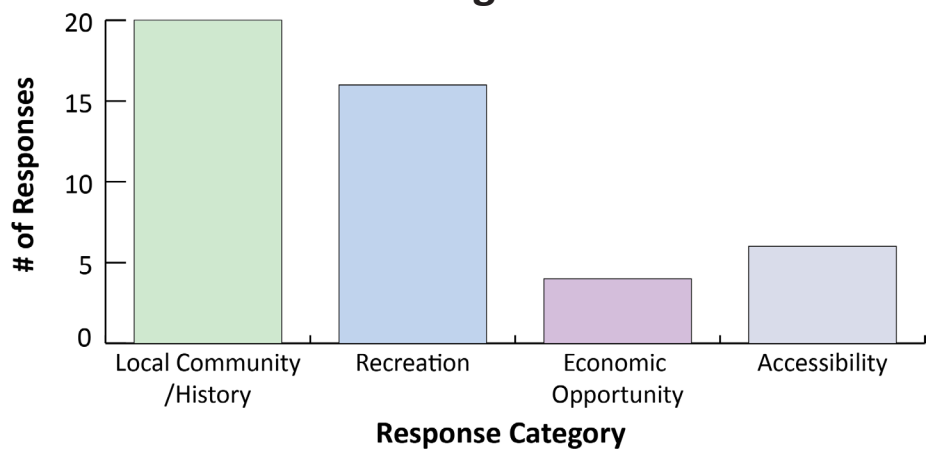


Participants use maps while brainstorming ideas for re-use.

Photo Credit: Mary Hashem, Adaapta

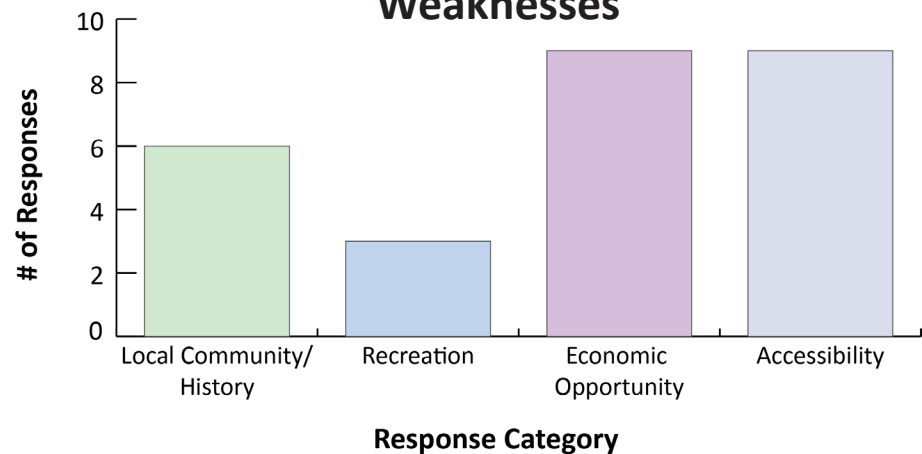
SWOT (Continued):

Strengths



Local Community/History	Recreation	Economic Opportunity	Accessibility
<ul style="list-style-type: none">Community involvementRich local historyPhilanthropy	<ul style="list-style-type: none">Trails and open spaceNatural beautyTongue River access	<ul style="list-style-type: none">StableStrong tourism	<ul style="list-style-type: none">Accessible to public

Weaknesses



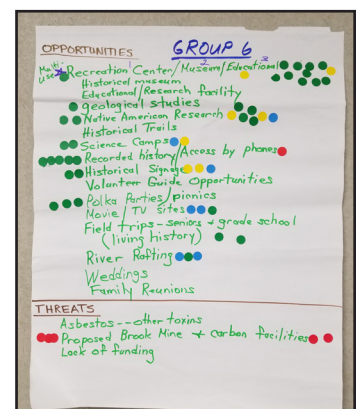
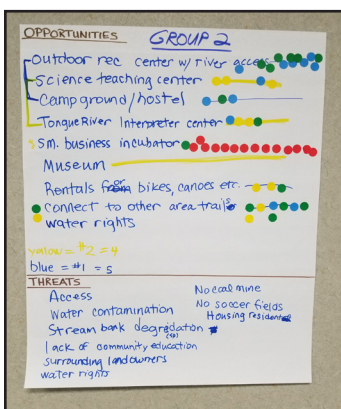
Local Community/History	Recreation	Economic Opportunity	Accessibility
<ul style="list-style-type: none">Lack of diversityLack of historical research	<ul style="list-style-type: none">General lack of recreation facilities	<ul style="list-style-type: none">Lack of fundingLow wages and few employment opportunitiesExpensive housing	<ul style="list-style-type: none">Lack of transportationSmall city/low populationIsolated from other communities

Opportunities:

After analyzing the community's overall strengths and weaknesses, each group brainstormed redevelopment options and threats unique to the site. On average, each group came up with around 3-10 different ideas for redevelopment, and 2-7 ideas for threats. After the brainstorming session ended, each group presented their ideas. Once all the ideas had been presented, each individual was given 6 "positive" sticky dots (blue, yellow, and green) and 2 "negative" sticky dots (red), which were then placed by their favorite and least favorite re-use ideas.

Redevelopment Ideas: Most Popular vs. Least Popular

- Outdoor Recreation Center (especially with river access) (76)
- Science/Teaching Center (22)
- Natural Park with Trails and Water Park (21)
- Botanic Gardens (14)
- Greenhouse/Vertical Farming (14)
- Trail Hub (10)
- Replica Mine Town (10)
- Preserve Unique Sheridan History (10)
- Native American Research (9)
- Recorded History - Accessible by Phone (6)
- Film Production Center (6)
- Indoor Recreation Center (6)
- Drone Racing (5)
- Golf Course (-24)
- Small Business Incubator (-14)
- Remove Building to Increase Access to River (-8)
- Film Production Center (-6)
- Resort (-5)

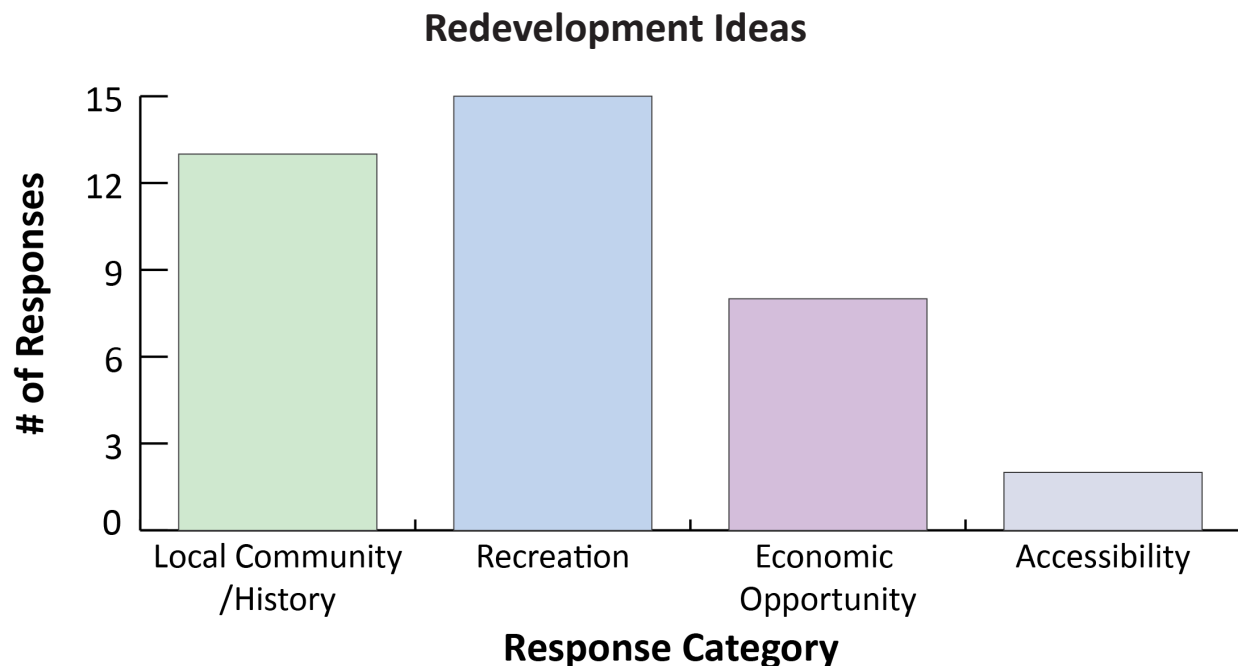


Outside: Examples of voting results for two out of seven groups

Center: Participants vote for their favorite and least favorite reuse ideas

Photo Credit: Blase Leven, KSU TAB Program

Opportunities (Continued):



Interestingly, while the participants identified economic opportunity and accessibility as major weaknesses within the area, less than half of the ideas for redevelopment were focused on economic opportunity, which included ideas like a small business incubator, resort, or a film production center, and accessibility, which included ideas like providing bike connectivity through the site. Instead, the most popular suggestions emphasized outdoor recreation, especially with river access, or educational/historic elements. In fact, the least popular ideas for redevelopment were generally the most economically productive uses. One notable exception is the Film Production Center, which received both 6 “positive” votes and 6 “negative” votes.

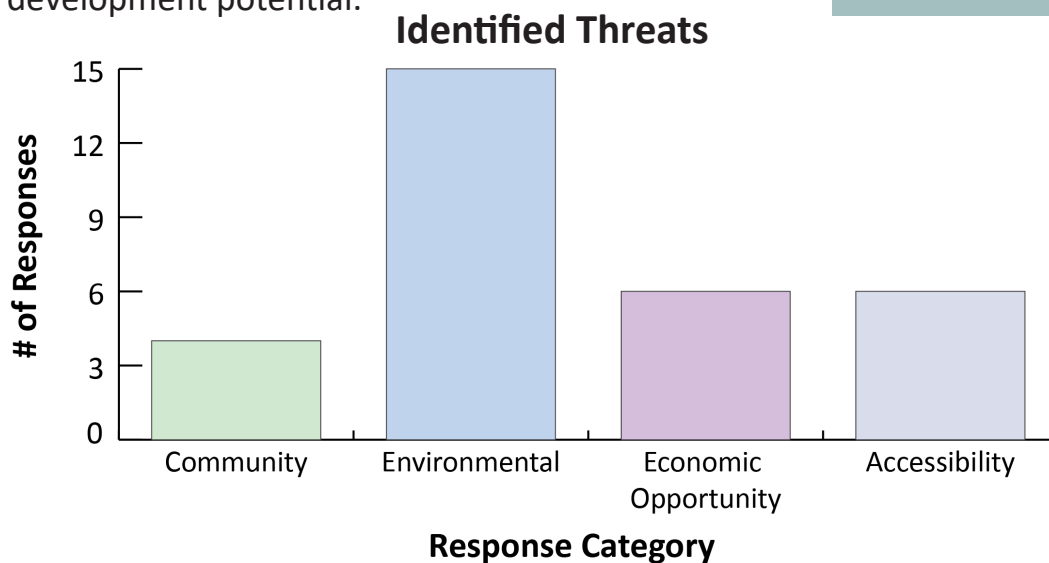
While the number of suggested recreation uses is only slightly higher than the number of local community/history uses (ie. education center, community center, history museum) shown in the bar chart above, participants overwhelmingly supported some sort of outdoor recreation center (76 “positive” votes) over a science/teaching center, the second most favorable type of use (22 “positive” votes). While it should be noted that other uses, such as Native American research and replica mine town would also fall under the Local Community/History response category, participants still heavily favored some sort of outdoor recreation use.



Participants vote on their favorite and least favorite reuse ideas **Photo Credit:** Blase Leven, KSU TAB Program

Threats:

For the Threats portion of the SWOT analysis, participants were asked to identify the most pressing obstacles facing the site. Environmental concerns, including contamination, floodplain issues, and proximity to existing and future coal mining operations were identified as threats most frequently by participants. Community members also considered the site's isolated location and accessibility issues as a point of concern, as well as the economic sustainability of the redeveloped use. While several groups brought up the issue of neighborhood opposition, this category posed the least threat to the site's re-development potential.



Threats:

- Contamination/Environmental Concerns
- Access
- Funding/Ongoing Maintenance Costs
- Opposition from Neighbors
- Water Rights
- Nearby Coal Mine

In order to more accurately describe the Threat sources, the “Local Community/History” category has been changed to “Community”, and “Recreation” has been changed to “Environmental”. However, these categories still roughly correspond to those shown in the previous charts.

Conclusion:



Acme Site, Present Day

Photo Credit: Sheridan Community Land Trust

While the former Acme Power Plant still has a long way to go on its path to re-development, the Community Visioning Session summarized in this report has provided valuable insight into potential partnerships, community priorities, and potential future uses for the property. The historic significance of the site, as well as its architectural value and proximity to the Tongue River, makes it a valuable community asset that could be enjoyed for years to come.

ATTACHMENT 2

Fact Sheets

Acme Power Plant

Project Summary



An Island of Debris ~ The site of the former Acme Power Plant is approximately 5.8 acres situated along the banks of the Tongue River, near the old Acme townsite. The plant was a coal-fired power plant that operated from approximately 1910 to 1976. Later, the site was used for other activities including automobile salvage and crushing services, and battery recycling. The area surrounding the site is a popular destination for outdoor enthusiasts and the Acme site, in particular, is an important piece of the area's mining history. The surrounding area is frequently used for hunting, fishing, floating, and other recreation. Many Sheridan residents still feel a strong attachment to the area because of a direct connection with people that used to live and/or work in the Acme community.

Current Condition~ In 2017, as part of a Targeted Brownfields Assessment by the US Environmental Protection Agency, a Phase II Environmental Assessment was conducted to characterize potential contaminants across the site. Contamination was identified in surface soils, groundwater, sediments, and building materials throughout the site. The extent of contamination has not been fully defined. Anyone accessing the site (especially illegal trespassers) has the potential to track contaminants to surrounding areas and/or injure themselves amid the debris.



Asbestos: Significant volumes of friable and non-friable asbestos, some of it damaged, were identified. Examples include pipe insulation, plaster, building insulation, roofing tar and coatings, fire brick, linoleum, boiler gaskets, and pipe joints. Trace amounts of asbestos were found in soils outside of the building.



Lead-Based Paint: Large quantities of lead-based paint were found on walls, ceilings, doors, and window components. Poor condition and deterioration has led to flaking paint scattered throughout the buildings and outside surfaces.

Unknown Drum Contents: Multiple areas of unlabeled drums are present across the site. Many of the drums are in poor condition. Drum assessments identified: oxidizers, flammables, combustibles, and non-combustibles. Multiple drums were unable to be assessed and present unknown hazards.



Other Contaminants: Various metals, PCBs, petroleum hydrocarbons and other known carcinogens were identified in soils, bank sediments, coal-ash piles and groundwater. While much of the contamination was present in low concentrations and mainly in shallow and surface soils, exposure risks via skin contact, inhalation, and ingestion are still present for anyone accessing the site.

The contamination present, in particular the friable asbestos and unlabeled drums, are the most significant known hazards to anyone accessing the site.

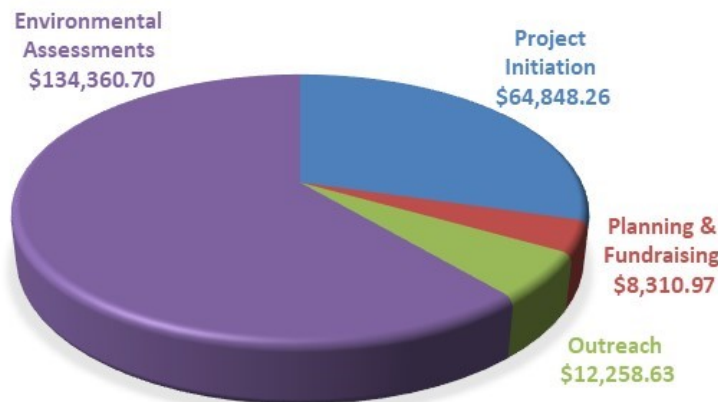
For more information~ The site is currently owned by the Sheridan County Conservation District, who is coordinating reclamation efforts with multiple other partners. A project website is being developed; in the meantime, please contact the District (www.sccdwy.org or 672-5820) for additional information or to provide input.

Project Vision~ The Tongue River watershed provides the water resource that drives the recreational, agricultural, municipal and wildlife opportunities for the region. Restoration of the Acme site will improve wildlife habitat and enhance existing recreation opportunities within the area. At an August 2017 visioning session facilitated by Kansas State University Technical Assistance to Brownfields group, participants heavily favored uses that included some sort of outdoor recreation and an appreciation of the area history. Although architecturally and technologically innovative for its time period, the building itself is one of the primary sources of contamination. No decisions have been made on whether it can be incorporated into future uses.



Photo credit: Blase Leven, KSU TAB Facilitator

Project Investment~ Over \$200,000 have already been invested in the project from a combination of state and federal programs, foundation grants, private donations, local government sources, and other partner contributions. Initial assessments and project initiation constitute approximately 90% of the project costs. As the project progresses, expenses associated with reclamation, outreach, and reuse planning will increase.



While no specific future uses have been determined, project partners identified expectations that must be maintained:

- ~Ensure Public Access/Use
- ~Protect Water and Land Quality
- ~Capture Historical Importance

Next Steps~ To realize the Project Vision, the site must be reclaimed to be safe and suitable for use. Final completion of the project is expected to be achieved within a 5 to 10 year timeframe, depending on the level of contamination and reclamation needed. Considerable cost is anticipated to coordinate and complete all of the necessary activities. Fortunately, programs exist to guide and assist with these efforts.

State Program Enrollment. The site has been enrolled in the Wyoming Department of Environmental Quality (WDEQ), Voluntary Remediation Program. This program provides guidance throughout the process so that a release of liability can be issued when reclamation is complete. Being registered in the program provides multiple options for reclamation, depending on specific future uses.

Site Stabilization. Initial and limited site stabilization work is planned to begin in the summer of 2018 with funding through the State of Wyoming. This work will include removal and disposal of the drums and their content, removal of some of the most accessible asbestos and PCB containing materials outside of the building, and identification of yet unknown significant hazards at the site. Following this initial site work, debris salvage operations are anticipated to remove the significant amount of debris and physical hazards.

Additional assessments. Comprehensive site reclamation of soil, groundwater, and the building require further assessment to determine the extent of contamination and develop a remediation plan. Funding for additional assessments is expected to come from an EPA Assessment grant (pending approval). Site reclamation will be funded by programs through the WDEQ, EPA and various public and private partners.



Acme Working Group~ Formed in December 2017, the Acme Working Group serves in an advisory capacity to the Sheridan County Conservation District, who currently owns the site and is responsible for overall project coordination. The purpose is to provide input and assistance for the technical aspects of the reclamation; the group will be expanded to include other interests as the project progresses.

- ~Sheridan County Conservation District ~Sheridan Community Land Trust ~The Nature Conservancy
- ~Sheridan County ~Wyoming Game and Fish ~Padlock Ranch ~Sheridan Travel and Tourism
- ~Montana Dakota Utilities ~Sheridan County Historical Society and Museum