DRAFT ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES
FOR
HOMER CHAPEL PROPERTY

BOSWELL, CHOCTAW COUNTY, OKLAHOMA

Prepared For

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LIST OF ACRONYMS

ACBA	Analysis of Brownfields Cleanup Alternatives
ACM	asbestos-containing material
AL	action level
AQCC	Air Quality Control Commission
AHERA	Asbestos Hazard Emergency Response Act
APCD	Air Pollution Control Division
ASTM	American Society for Testing and Materials
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CH	Chrysotile
COC	contaminant of concern
CPSC	Consumer Product Safety Commission
EC	engineering control
EPA	United States Environmental Protection Agency
ESA	environmental site assessment
f/cc	fibers per cubic centimeter
HMWMD	Hazardous Material and Waste Management Division
IC	institutional control
ID	identification
LBP	lead-based paint
LF	linear feet
N/A	Not Applicable
O&M	Operations and Maintenance
ODOL	Oklahoma Department of Labor
OSHA	Occupational Safety and Health Administration
PEL	Permissible Exposure Limit
P.G.	Professional Geologist
PLM	polarized light microscopy
RACM	regulated asbestos-containing material
sq. ft.	square feet
START	Superfund Technical Assessment and Response Team
SOO	Statement of Objectives
TDD	Technical Direction Document
TSI	thermal system insulation

SUMMARY

Crystal Creek LLC was tasked to conduct a brownfield cleanup alternatives analysis at the Homer's Chapel Property. The site is located at North 3985 Road, Boswell, Oklahoma 74727. ACM and LBP testing was previously conducted at the Homer's Chapel Property by Crystal Creek, LLC, an Oklahoma licensed engineer firm, for the Choctaw Nation and completed in July 2024. The *Phase II Environmental Site Assessment* for Homer's Chapel Property – *Homer's Chapel and former residence, Boswell, Oklahoma,* details the work performed, methods used, information and data acquired, and evaluation and interpretation of results as part of the Phase II ESA. This draft Analysis of Brownfields Cleanup Alternatives is based upon the information presented in the Brownfields Pilot Project, Phase II ESA report, is for the Homer's Chapel and former residence only.

SCOPE OF CLEANUP

Based upon the results of the Phase II ESA for Homer's Chapel Property, the specific concerns addressed in this conceptual cleanup alternatives analysis for the Site include:

A. Asbestos-containing materials (ACM) identified at the Site

EVALUATION CRITERIA

Cleanup alternatives considered as part of this analysis were evaluated against the following criteria:

- Compliance;
- Effectiveness;
- Difficulty of Implementation;
- Cost.

PREFERRED ALTERNATIVE SELECTED

Of the three cleanup alternatives evaluated for selection at the Homer's Chapel Property, SE intersection of Hwy 70 and N 3985 Road, Boswell, Oklahoma 74727, the preferred alternative recommended is:

Alternative 3: Removal of All ACM.

This alternative was selected based upon overall compliance with tribal and federal regulations, effectiveness in protecting human health and the environment in both the short-term and long-term, feasibility of implementation, and cost effectiveness. In addition, this alternative is the closest match to the detailed plans for reuse that have already been considered.

Presented below are the engineering costs to remediate the COCs at the Site. Engineering costs were determined based upon information obtained from the previous Phase I & Phase II ESA (2024), additional sampling and past experience on similar projects. Actual bids from companies to perform the work may vary from this estimate depending on local conditions and other factors outside of the assessor's knowledge. Final design specifications, features, and cost of the actual remedy may differ from the conceptual design presented.

Actual bids from companies to perform the work may vary from this estimate depending on local conditions and other factors outside of the assessor's knowledge. Final design specifications, features, and cost of the actual remedy may differ from the conceptual design presented. A detailed conceptual cost estimate breakdown for the total shown below is presented on Table 1.

Remediation Task	Remediation Cost
Removal of All ACM	$18,350.00
Total	**$18,350.00**

This summary is a general description of the cleanup alternatives analysis for the Site. This section is not intended to be used alone and does not include the basis of all conclusions presented. The report should be read and used in its entirety and in conjunction with the Brownfields Pilot Project and Phase II ESA report. Information included in this section is subject to the scope of services and limitations noted in the full ABCA, Brownfields Pilot Project and Phase II ESA reports.

1.0 INTRODUCTION

Crystal Creek LLC was tasked to conduct a Phase II Environmental Site Assessment (ESA) and Analysis of Brownfields Cleanup Alternatives at Homer's Chapel Property, North 3985 Road, Boswell, Oklahoma 74727 (Site). The Phase II ESA report, for Homer's Chapel Property, Choctaw County, Oklahoma, details the work performed, methods used, information and data acquired, and evaluation and interpretation of results. This Analysis of Brownfields Cleanup Alternatives is based upon the information presented in the Crystal Creek, LLC's, Phase II Environmental Site Assessment (ESA) dated July, 2024. This draft Analysis of Brownfields Cleanup Alternatives is based upon the information presented in the Phase II ESA report.

1.1 Background-History

Homer's Chapel, originally known as Homma Chapel, began as the center of a small Choctaw community. Early camp houses and animal pens would be arranged in a circular pattern around the chapel, reflecting the design of pre-removal stomp grounds. The chapel's entrance faces east, a meaningful orientation for the Choctaw people, as it aligns with the rising sun, a symbol of light and renewal.

Although the current structure is not the original chapel built sometime between the 1850s and 1925, with the existing building dating to 1925, still holds deep historical and cultural value of the Choctaw Nation people. In 2016, the property was donated to the Choctaw Nation by the Cumberland Presbytery.

The Homer's Chapel Property consists of approximately 10.9 acres and three (3) structures located approximately at the SE intersection of Hwy 70 and N 3985 Road, 3.5 miles west of the intersection of Hwy 70 and Hwy 109, Boswell, Oklahoma. The Homer's Chapel Property contains the requested three (3) buildings which were included in the Phase II asbestos containing material which need attention. The buildings requested are as follows:

1. Homer's Chapel
2. Former Residence
3. Outhouse (no regulated material)

ACM and LBP and lead-in-soil testing was conducted in all Homer's Chapel Property structures by Crystal Creek, LLC for a Phase II. Crystal Creek, LLC's, Phase II Environmental Site Assessment (ESA) dated July, 2024 did not find any LBP on any components on any structures, but did identify ACM drywall materials in both the Homer's Chapel and the former residence.

The current Homer's Chapel was constructed in 1925 is approximately 1,250 sq ft and is currently vacant. The interior structure is mostly in poor condition. The visual inspection determined the

interior walls and ceiling were mostly in dilapidated condition in both Homer's Chapel and former residence.

The ground surface at the site slopes to the east. Groundcover consists primarily of native grasses, berries and trees. The property is at the SE intersection of Hwy 70 and N 3985 Road, approximately 3.5 miles east of the intersection of Hwy 109 and Highway 70, Boswell, Oklahoma.

1.2 Summary of Phase II ESA Results

The Phase II ESA was conducted in accordance with *ASTM International – Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process E1903-19.* The results of the Phase II ESA confirmed the presence of contaminants of concern (COCs) at the Site. The following list is a summary of the conclusions regarding COCs and associated media identified at the Site that are addressed in this cost estimate:

ACM: Of the samples submitted for laboratory analysis, fourteen samples were reported as "positive" (>1% asbestos) for asbestos. Asbestos was identified in most buildings of the Homer's Chapel Property. ACM is considered to be a contaminant of concern (COC) in relation to the Site. The asbestos drywall material was found throughout the Homer's Chapel. The following table indicates the location and estimated extent of ACM identified at the Site.

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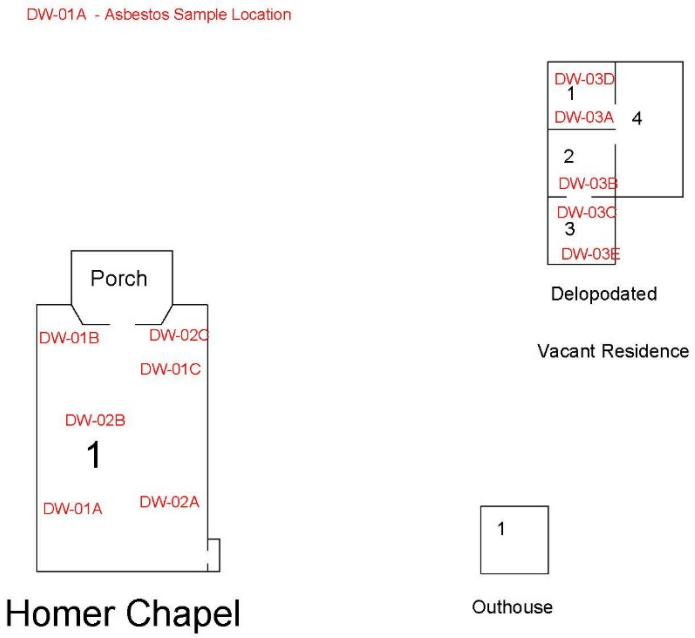
TABLE 2: SUMMARY OF HOMOGENEOUS SAMPLING AREAS HOMERS CHAPEL & VACANT RESIDENCE

HA #	HOMOGENEOUS MATERIAL DESCRIPTION	HOMOGENEOUS MATERIAL LOCATION	FRIABILITY (F/NF)	% ASBESTOS*	# OF SAMPLES COLLECTED	CONDITION	APPROXIMATE QUANTITY
DW-01	*Drywall, Texture, & Joint Compound*	*Homers Chapel-Walls*	*F*	*3%C*	*3*	*D*	*1,050 SF*
DW-02	*Drywall, Texture, & Joint Compound*	*Homers Chapel-Ceilings*	*F*	*3%C*	*3*	*SD*	*1,050 SF*
DW-03	*Drywall, Texture, & Joint Compound*	*Vacant Residence*	*F*	*3%C*	*5*	*SD*	*1,100 SF*

NA= Not Applicable ND= None Detected MAS= Mastic CT= Ceiling Tile C= Chrysotile NIS= Not in Scope of Work DW= Drywall JC= Joint Compound TXT= Texturing V= Vermiculite

Interior Materials Homer's Chapel Property

The following tested components were found to contain asbestos in a concentration greater than 1.0 %.



Exterior Materials – Homer's Chapel Property

The no exterior tested components were found to contain asbestos in a concentration greater than 1.0 %.

1.3 Project Goals / Site Reuse Plan

Based on information provided by the Choctaw Nation Brownfields Program, there is no current site reuse plan. Reuse plans to be determined through outreach, LAT process, and Tribal Council

determination. Earlier indications from 2019 were for reuse as a community ceremonial or service space.

1.4 Cleanup Scope and Goals

Based upon the results of the Phase II ESA conducted, the specific concerns addressed in this conceptual cleanup alternatives analysis for the Site include:

A. ACM identified at the Site

The overall purpose of a cleanup at the Site is to allow the property to be redeveloped while mitigating the risk that COCs currently present at the Site pose to human health and the environment. The cleanup goal(s) for the Site are listed below:

- Remove and dispose of COCs to allow for redevelopment of the property;
- Conduct cleanup operations that are compliant with applicable local, Tribal, and federal standards that will protect human health and the environment;
- Implement cleanup alternative(s) that are practical and effective in mitigating COCs to protect human health and the environment in both the short-term and long-term.

2.0 EVALUATION CRITERIA FOR ALTERNATIVES

Each of the potential cleanup alternatives is evaluated against the following set of four criteria:

2.1 Compliance

Compliance with applicable state, federal and tribal regulations.

2.1.a Cleanup Oversight Responsibility

The cleanup will be overseen by the Tribal Response Program in consultation with EPA. In addition, all documents prepared for this site are submitted to the CNO Tribal Response Program/ CNO Brownfields Department under CNO Tracking Number CHOTF0118 and to EPA under ACRES site number 249059. It is recommended that the following regulations be followed: The Small Business Relief and Brownfields Revitalization Act, Occupational Safety and Health Act, and any applicable provisions of the Clean Air Act, Resource Conservation and Recovery Act, the Toxic Substance Control Act, and Comprehensive Environmental Response, Comprehensive, and Liability Act where they pertain to remediation. Applicable sections of the CNO Environmental Codes and the CNO Asbestos Policies will be followed. Also, the following qualifications should be held by the remedial contractor(s) selected to oversee and/or implement the following remediation tasks and activities:

ACM Remediation

All aspects of ACM Cleanup Oversight must be conducted in accordance with the CNO Asbestos Policy, Occupational Safety and Health Administration (OSHA) 1926.1101, Asbestos NESHAP found in 40 CFR Part 61, Subpart M and DEQ has the delegated responsibility to regulate this NESHAP in Oklahoma. When selecting firm(s) and/or individuals to utilize, it is recommended that the following certifications be verified, at a minimum:

1) State of Oklahoma licensed Asbestos Management Planner to perform:
   - Development of asbestos project designs;
   - Air monitoring for asbestos fibers;

2) State of Oklahoma licensed Asbestos Abatement Contractor.

3) Abatement required air monitoring shall be overseen by a licensed third-party contractor. All clearance will be overseen by that same third-party contractor. So that the abatement activities and clearance activities are overseen by two different contractors.

2.1.b Cleanup Standards for Contaminants

The following standards are recommended to be met during the remediation tasks and activities:

ACM Remediation

Cleanup levels for ACM remediation must meet standards in accordance with 40 CFR Part 61, Subpart M and DEQ has the delegated responsibility to regulate this NESHAP in Oklahoma. Occupational Safety and Health Administration (OSHA) 1926.1101. Examples of applicable standards include:

Asbestos Action Levels		
Asbestos Sample	**Regulatory Action Level**	**Source of Regulation**
Regulated Asbestos-Containing Material (RACM) – Bulk Materials	>1% asbestos	Asbestos Hazard Emergency Response Act (AHERA)
Asbestos Air Monitoring - Workers	0.1 fibers/cubic centimeter (f/cc) (action level [AL])	Occupational Safety and Health Administration (OSHA) 1926.1101
	0.2 f/cc (Permissible Exposure Level [PEL])	OSHA 1926.1101
Asbestos Air Monitoring – Final Clearance	0.01 f/cc	EPA AHERA

2.1.c Laws & Regulations Applicable to Cleanup

The following laws and regulations are mandatory and/or recommended to be followed during the cleanup tasks and activities:

ACM Abatement

- Occupational Safety and Health Administration (OSHA) 1926.1101
- Asbestos NESHAP is found in 40 CFR Part 61, Subpart M and DEQ has the delegated responsibility to regulate this NESHAP in Oklahoma – Governs the disposal of asbestos waste and the management of asbestos contamination.
- Small Business Liability Relief and Brownfields Revitalization Act, enacted in 2002, which amended the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

2.2 Effectiveness

- Protection of human health and the environment, including workers during implementation;
- Feasibility for mitigation of risk in the short-term and long-term effectiveness;
- Complete removal of contaminants;
- Achievability of the cleanup goals;

2.3 Difficulty of Implementation

- Technical feasibility;
- Availability of work force, materials, and equipment;
- Administrative ability;

- Construction feasibility;
- Maintenance and monitoring requirements.

2.4 Cost (Conceptual costs for comparative analysis only)

- Time requirements, materials, equipment, labor and waste disposal locations.

The selection of "effectiveness", "feasibility", and "cost" as evaluation criteria is based upon the EPA's *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (EPA, 1988). In addition, the selection of "compliance" as an evaluation criterion is used consider variations between federal, state, and/or local regulations, if applicable, on a site-by-site basis.

3.0 CLEANUP ALTERNATIVES FOR EVALUATION

Listed below are the specific cleanup alternatives evaluated based upon the results of the Phase II ESA conducted at the Site. In addition, alternatives considered, but not evaluated due to site-specific factors which eliminated the alternative from further analysis are also listed, if applicable.

3.1 Cleanup Alternatives Evaluated

The following removal action alternatives were considered as part of this evaluation.

- Alternative 1: **No Action**
- Alternative 2: **Contain, Clean and/or Encapsulate Damage Friable ACM**
- Alternative 3: **Removal of All ACM.**

4.0 COMPARATIVE ANALYSIS OF CLEANUP ALTERNATIVES

The potential cleanup alternatives for the Site were evaluated using the evaluation criteria described in Section 2. General descriptions of the conceptual design of each alternative are described below. Discussions of the pros and cons of each alternative are presented in the following subsections. Final design specifications and features of the actual remedy may differ from the conceptual design described herein.

Alternative 1: (No Action) The No Action alternative would involve leaving the Site in its current state. There would be no removal, containment, engineering control (EC), or institutional control (IC) actions implemented. The No Action alternative provides a baseline against which other

alternatives can be compared. A consideration of risk is taken into account if no action is taken as opposed to implementing a cleanup action.

Alternative 2: Contain, Clean and/or Encapsulate Damage Friable ACM. This consists of containing, cleaning and encapsulating the deteriorated asbestos-containing material (ACM). This would include clean the asbestos drywall components off floors and items left in the structures. The development and implementation of an Operations and Maintenance (O&M) Plan for ACM to handle the damaged ACM left in place on walls in this alternative.

Alternative 3: Removal of All ACM. Alternative 3 consists of removing and disposing of all ACM. The abatement will follow the Project Design developed by a licensed Project Designer. The asbestos abatement will also follow all federal regulations and be completed by a licensed asbestos abatement contractor. Alternative 3 will allow for safe restoration and use in the future.

4.1 Compliance

Alternative 1 (No Action) would not be compliant with Tribal and/or federal regulations for the Site in its current condition due to the presence and deteriorated condition of the known COCs. The areas with asbestos and LBP damage should have very limited access. Personnel entering these areas should have awareness training at a minimum. This alternative will increase ongoing maintenance.

Alternative 2 Contain, Clean and/or Encapsulate Damage Friable ACM. Alternative 2 consists of containing, cleaning and encapsulating the deteriorated asbestos-containing material (ACM). This would include clean the asbestos drywall components off floors and items left in the structures. The development and implementation of an Operations and Maintenance (O&M) Plan for ACM to handle the damaged ACM left in place on walls in this alternative. Therefore, Alternative 2 follows Tribal and federal regulations for ACM but will not allow for safe restoration of the facility.

Alternative 3 Removal of All ACM. Alternative 3 consists of removing and disposing of all ACM according to all federal, state and local regulations. Therefore, Alternative 3 is in compliance with CNO LBP Policy, federal and local regulations for ACM and will allow for safe restoration for future use by CNO tribal members.

4.2 Effectiveness

Alternative 1 (No Action) will not reduce the potential for exposure of human health and the environment to COCs or provide a reduction in the toxicity, mobility, or volume of contaminants as site conditions will deteriorate continually with time. The estimated risk from COCs to potential receptors would not be decreased in the short-term or long-term.

Alternative 2 Contain, Clean and/or Encapsulate Damage Friable ACM. This alternative includes/consists of containing, cleaning and encapsulating the deteriorated asbestos-containing material (ACM) which will reduce the potential for exposure of human health and the environment to COCs. The estimated risk from COCs to potential receptors would be decreased in the short term. Alternative 2 would **not** achieve the cleanup goals set for the Site in the short-term or long-term. This alternative does achieve a use outcome for the property and will not be effective to allow for safe restoration of the facility.

Alternative 3 Removal of All ACM will be effective in the short-term and long-term due to the removal of all the COCs. If implemented properly, due to no asbestos contaminants left on-site there will be no risk to human health or the environment remaining at the Site. This alternative is the only one that is the safest for workers and eliminates the chance of asbestos exposure to human health and the environment. This alternative will allow for the CNO cleanup goal to be effectively achieved.

4.3 Difficulty of Implementation

Alternative 1 No Action is technically and administratively feasible. Maintenance or monitoring will be required. Although implementation is possible, the "No Action" alternative would not meet the cleanup goal may expose current occupants to COCs.

Alternative 2 Contain, Clean and/or Encapsulate Damage Friable ACM. Alternative 2 consists of containing, cleaning and encapsulating the deteriorated asbestos-containing material (ACM). An Operations and Maintenance (O&M) Plan for ACM left in place for this alternative will be developed and on-site maintenance personnel will be trained to implement the plans. This type of cleanup and stabilization is feasible and but not standard practice of asbestos. Difficulty to implement this plan is low to moderate, but does achieve the CNO use outcome for the property and will not allow for safe restoration of the facility.

Alternative 3: Removal of All ACM Alternative 3 consists of removing and disposing of all ACM. The abatement will follow the Project Design developed by a licensed Project Designer. This alternative is the only one that is the safest for workers and eliminates the chance of asbestos exposure to human health and the environment. This alternative will allow for the CNO cleanup goal and planned reuse to be achieved.

The difficulty level of implementing this plan is moderate. Coordination during cleanup activities is anticipated with short-term moderate disturbance to the site. THPO consultation would also be required and coordinated with EPA, SOI, and CNO would be required.

Access to the Site is currently available and no areas are inaccessible by passenger vehicles. No road improvements would be required to provide access for construction equipment and personnel.

4.4 Cost

Costs incurred are evaluated on a scale of low, moderate, and high in relation to each of the other alternatives and based upon past experience with similar projects. Conceptual costs (not intended for budgetary estimates) were evaluated for time, effort, labor, and materials necessary.

Alternative 1 (No Action) has low costs associated with this option. Minimal amounts of time, effort, and labor would be required board up all access points.

Alternative 2 Contain, Clean and/or Encapsulate Damage Friable ACM. This level of work will take similar time and effort as removal, except asbestos materials are left in place and will require monitoring.

Alternative 3: Removal of All ACM consists of removing and disposing of all ACM. This alternative is the only one that is the safest for workers and eliminates the chance of asbestos exposure to human health and the environment. This alternative will allow for the CNO cleanup goal and planned reuse to be achieved

A summary of the cost comparison of each of the alternatives is presented in the following table, with the most expensive alternative listed as 3rd and the least expensive alternative listed as 1st.

4.5 Summary Comparison of Potential Alternatives

Comparisons are based on the four evaluation criteria previously discussed. A summary of the comparison of each of the alternatives is presented below along with status as to whether the alternative was retained for consideration as the preferred alternative selected.

Cleanup Alternative	Compliance	Effectiveness	Implementability	Cost	Comment
Alternative 1: No Action	Non-compliant	Not effective	Implementable	$2,000 to $3,500	This alternative does not satisfy the cleanup goals for this site. Cost to secure the buildings.

Cleanup Alternative	Compliance	Effectiveness	Implementability	Cost	Comment
Alternative 2: Cleaning & Encapsulation of Friable ACM - RACM	Compliant	Effective	Implementable	$11,000	This alternative does **not** satisfy the cleanup goals for this site and allows for continued use of the property. It leaves the asbestos in the walls and ceilings that will require monitoring and needs to be removed in future restoration of the Site
Alternative 3: Abatement of All	Compliant	Effective	Implementable	Abate 2 Structures $18,350 Abate Homer's Chapel & Wet Demolition Former Residence $ 34,700	This alternative satisfies the cleanup goal for the building and is the option that permanently mitigates the asbestos However, it is the most expensive alternative but is the most compliant and effective option.

5.0 PERFERRED CLEANUP ALTERNATIVE

5.1 ACM REMOVAL AND LBP ABATEMENT

Of the three cleanup alternatives evaluated for selection at the Homer's Chapel Property, at the SE intersection of Hwy 70 and N 3985 Road, Boswell, Oklahoma 74727, the preferred alternative recommended is:

Alternative 3: Removal of All ACM.

This alternative was selected based upon overall compliance with state and/or federal regulations, effectiveness in protecting human health and the environment in both the short-term and long-term, feasibility of implementation, and cost effectiveness. In addition, this alternative is the closest match to the detailed plans for reuse that have already been considered.

Presented below are the engineering costs to remediate the COCs at the Site. Engineering costs were determined based upon information obtained from the previous Phase I & Phase II ESA (2024), and past experience on similar projects. Actual bids from companies to perform the work may vary from this estimate depending on local conditions and other factors outside of the

assessor's knowledge. Final design specifications, features, and cost of the actual remedy may differ from the conceptual design presented.

6.0 SPECIFICATIONS FOR REPORT USE AND RELIANCE

6.1 Special Terms and Conditions

This document has been prepared for the Choctaw Nation for the use and benefit of the Choctaw Nation. Any use of this document or information herein by persons or entities other than Choctaw Nation without the express written consent will be at the sole risk and liability of said person or entity. It is understood that this document may not include all information pertaining to the described site.

6.2 Disclaimers

The cost estimate in this report is based upon the Phase II Environmental Site Assessment (ESA 2024) by Crystal Creek LLC, Inc. Phase II Environmental Site Assessment (ESA) which were in general conformance with the scope and limitations of ASTM E1903-19. The cost estimate presented herein is based on costs from engineering estimate past experience on similar projects as selected alternative presented in this document. Professional opinions are based solely on data collected during the assessment and/or interpretation of information and past data provided for review. Crystal Creek LLC does not warrant or guarantee information obtained from third parties used for this assessment are correct, complete, and/or current.

7.0 REFERENCES

Oklahoma Department of Labor, Oklahoma Asbestos Control Act 40 O.S. § 450, et seq. Abatement of Friable Asbestos Materials Rules OAC 380:50

Asbestos NESHAP is found in 40 CFR Part 61, Subpart M and DEQ has the delegated responsibility to regulate this NESHAP in Oklahoma.

American Society for Testing and Materials (ASTM), 2021. E1903-19, *Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process.*

EPA, 1988. *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*. (EPA/540/G-89/004).

HUD LBP Guidelines for the Evaluation and Control of LBP hazards in Housing, Chapter 7

Phase I Environmental Site Assessment (2020), A & M Engineering and Environmental Services, Inc.

Phase II Environmental Site Assessment (2024), Crystal Creek LLC