Working DRAFT

Community Relations Plan

Supplemental Vapor Intrusion Assessment

June 2017

Flint Group Pigments Facility
2401 5th Avenue
Huntington, West Virginia

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INTRODUCTION

BASF is committed to identifying and addressing site-related environmental conditions that could impact human health or the environment at the Flint Group Pigments Facility, (Facility) in Huntington, West Virginia (Community). As a part of BASF's intent to develop a Work Plan for Vapor Intrusion Assessment, BASF has prepared this Community Relations Plan (CRP) to establish trust and credibility with the Community, ensure the Community is informed regarding environmental assessment activities associated with on-going remediation at the facility, and create open and ongoing lines of communication. As a former property owner, BASF is the company overseeing the remedial program. This is a working document and therefore information within is subject to change to improve reliability, function, communication, or otherwise as various stages of site-related environmental conditions are addressed.

The specific objectives of this CRP are to:

- Provide information to the Community on environmental conditions and potential health effects associated with those conditions;
- Provide information on the ongoing environmental investigations and response actions under consideration;
- Encourage Community members and stakeholders to express any concerns about the actions being undertaken; and
- Include citizen comments and concerns in the decision-making process

This CRP includes an overview of the Facility's history, planned investigation activities and response actions, Community background information, and a description of the community relations activities.

The BASF project team (Team) will inform the Community's many stakeholders of the key findings of the Vapor Intrusion Assessment project and future activities as project milestones occur. The Team will coordinate with federal, state, and local agencies, elected officials, Community leaders, nearby residents and businesses, and the media throughout the course of the project to effectively communicate information about the project and address stakeholder concerns.

The following sections describe the Facility, provide an overview of vapor intrusion and why it is a potential concern for the Community, and what actions BASF is taking to address the concern.

FACILITY DESCRIPTION AND HISTORY

The Facility is located at 2401 5th Avenue and occupies 20 acres on both sides of 5th Avenue at 24th Street in Huntington, West Virginia. It was historically used to create colors for paints and production began in 1912. The primary pigment currently manufactured at the Facility is alkali blue. The Facility is currently owned by Flint Group Pigments; previous owners include Standard Ultramarine Company, Chemetron Corporation, and BASF Corporation.

The investigation and remedial activities at the facility are being conducted under the direction of the United States Environmental Protection Agency (USEPA) Region 3's RCRA Corrective Action Program, with assistance from the West Virginia Department of Environmental Protection. USEPA Region 3 has identified eleven Areas of Concern (AOCs) at the Facility including: a landfill, above ground storage tanks, electrical transformers and a wastewater treatment system. An Area of Concern is an area where previous activities may have resulted in a release of chemicals to the environment that requires assessment and could require remediation. AOC 9 – Site-Wide Groundwater – is the AOC that is of primary interest as the source of potential vapor intrusion impacts in the off-site areas, but all AOCs are being studied and vapor intrusion is being evaluated in both off-site and on-site areas.

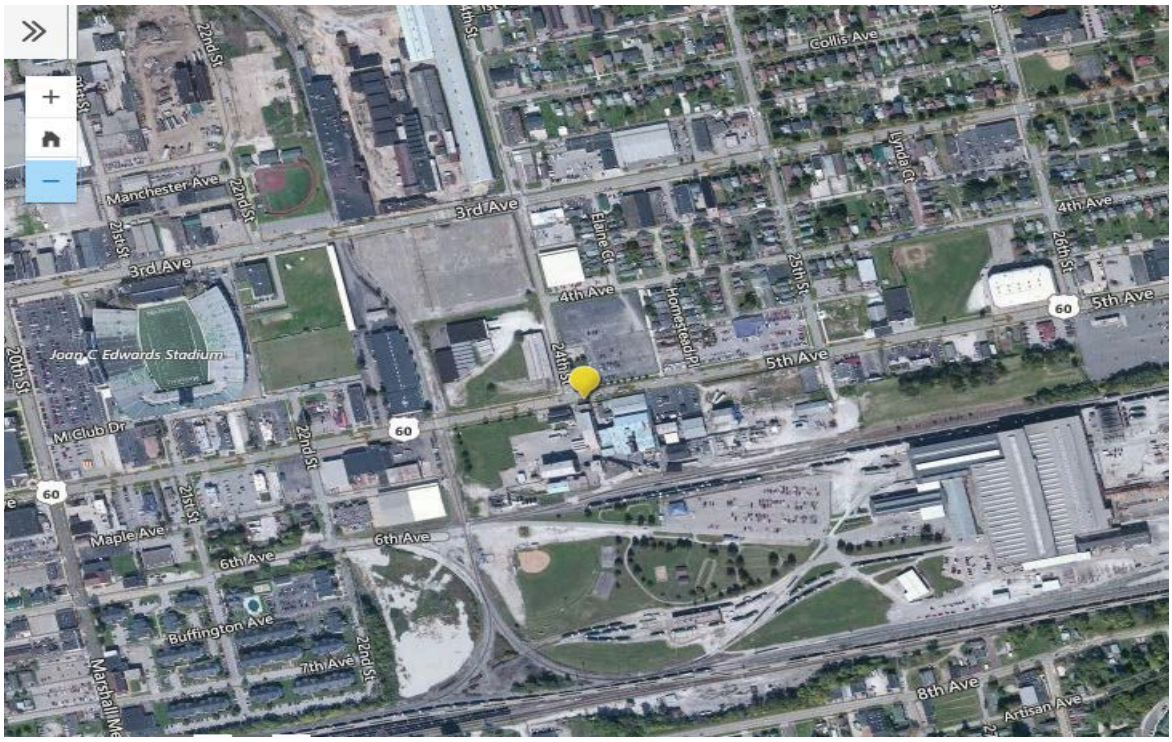

Figure 1. Location of the Flint Pigments Group Huntington, WV facility.

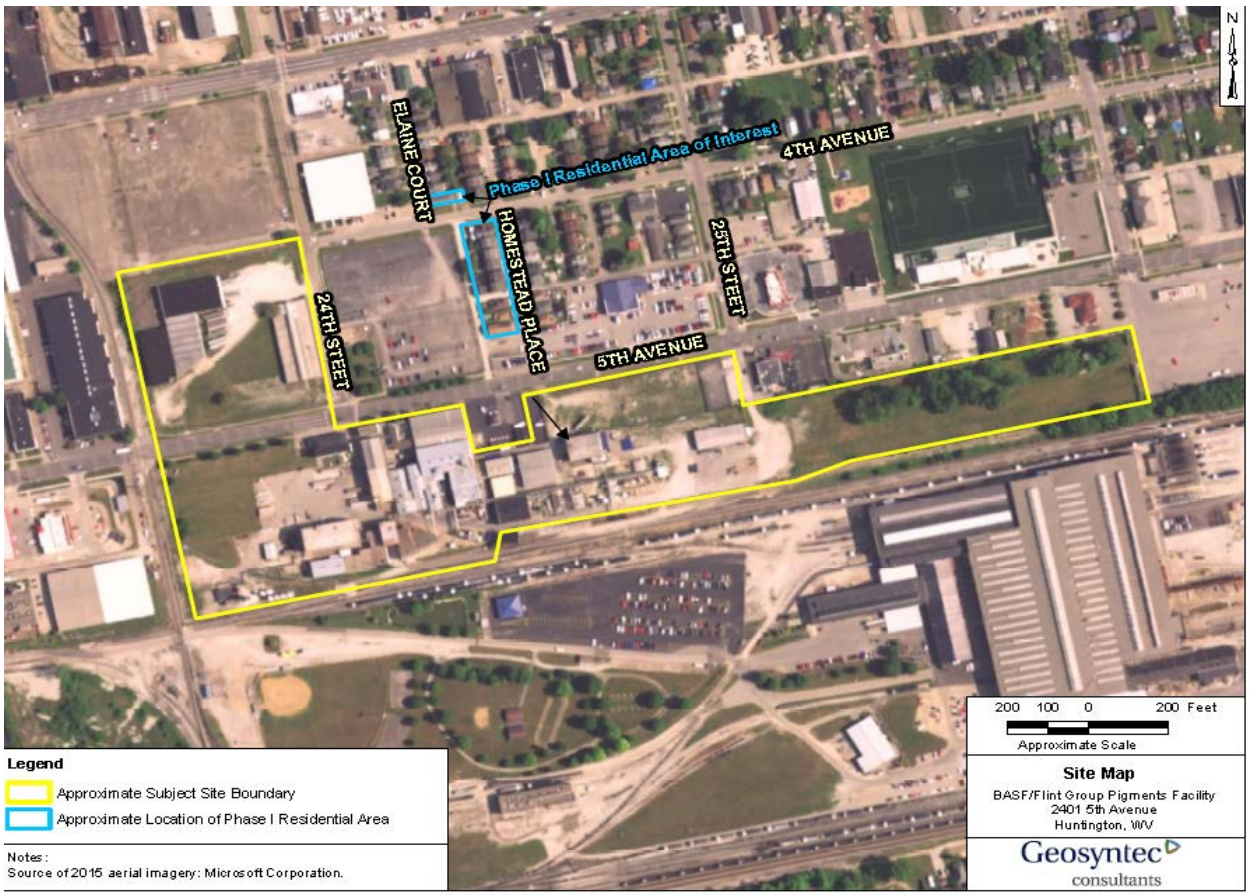

Figure 2. Phase 1 Area of Interest

PROJECT TEAM

BASF has put in place a team of staff and consultants experienced in engineering, environmental investigations, and community engagement. BASF will serve as the interface between the project team (Team) and USEPA. BASF has retained Geosyntec Consultants, Inc., to lead the technical project. Orion Strategies will support community engagement initiatives.

Key consultant personnel who will serve on BASF's Team include the following:

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VAPOR INTRUSION OVERVIEW

Vapor intrusion (VI) refers to chemical vapors that can move up through soil and seep into buildings. It can occur when chemicals are spilled on the ground, poured down drains or disposed of improperly. These chemicals, usually volatile organic compounds (VOCs), "off gas" easily from contaminated groundwater or soil and move through soil in vapor form. These vapors can enter buildings through cracks in slabs, basement floors and walls, and through openings around sump pumps or where pipes and electrical wires go through the foundation. This intrusion is similar to how radon gas seeps into buildings.

It is important to note that there are many other sources of VOCs that can impact the air inside buildings. Many common household products contain chemicals that may off gas VOCs, and it is very common to find those "background" VOCs in indoor air samples. These products include paints, glues, cleaning products, cigarette smoke, gasoline stored in garages, thinners, etc. When testing for vapor intrusion impacts, steps are taken to make sure these other sources are considered. The following EPA document, *A Citizen's Guide to Vapor Intrusion Mitigation,* https://www.epa.gov/remedytech/citizens-guide-vapor-intrusion-mitigation, provides helpful information on VI mitigation and how it works. This guide is also available on the Project's website, www.huntingtonsiteproject.com.

BASIS FOR VAPOR INTRUSION ASSESSMENT

Groundwater monitoring wells at the Facility's boundaries exhibit concentrations of VOCs that exceed USEPA's VI screening levels. This means that investigation of the VI pathway is warranted as there could be a potential for vapors off gassing from the groundwater to seep into adjacent buildings resulting in indoor air concentrations that could be a health concern. It does not mean, however, that the buildings necessarily will be affected by VI, because many factors can influence, positively or negatively, vapor flow through the soil and into buildings. The investigation is designed to determine whether vapors are seeping from the subsurface into the buildings and, if so, whether the concentrations pose an unacceptable health risk.

BASF ACTIONS TO ADDRESS VAPOR INTRUSION CONCERNS

BASF has developed a technical work plan outlining the sampling program that it will use to evaluate potential risks from vapor intrusion. The project will be conducted both on-site and off-site, and is expected to proceed in phases. The work plan describes the sampling strategy, how the sampling will be conducted, and how decisions will be made based on the sampling results. The work plan is available for review at the Cabell-Huntington Public Library located at 455 9th St., #6, Huntington, WV 25701 and on the project's website, www.huntingtonsiteproject.com.

The off-Facility investigation initially will include (with the building owner/occupant's permission) sampling of air in the crawl spaces of the 10 residences located downgradient or cross-gradient of the North Parking Lot. All 10 residences are within a 100-foot radius of an existing groundwater monitoring points where VOC concentrations exceed the screening levels that USEPA indicate warrant VI investigation.

Garages confirmed to have tenant occupied apartments and that are within 100 feet of an existing groundwater monitoring point where VOC concentrations exceed screening levels also will be evaluated in the initial phase of investigation.

Further delineation of groundwater contamination is planned for both on-site and off-site areas. The groundwater sampling may be ongoing near the residences at the same time as the initial phases of VI sampling within the structures.

The results of the initial residential sampling as well as the results of any additional groundwater sampling will be used to determine where and what additional sampling may be needed. A more detailed description of sampling, the decision process for determining follow-on sampling activities, and general information about soil gas vapors is outlined in the Work Plan for Vapor Intrusion. Again, this work plan is available for review at the Cabell-Huntington Public Library located at 455 9th St., #6, Huntington, WV 25701 and on the project's website, www.huntingtonsiteproject.com.

COMMUNITY PROFILE

Municipal Information

- Population: 48,638
- City Website: www.cityofhuntington.com
- City Square Miles: 18.46
- Businesses: 4,081
- Recreation Acres: 1,400

Huntington, West Virginia is a four-season city founded in 1871 as a C&O Railroad hub on the lands near Guyandotte. Home to Marshall University, Huntington stretches between both Cabell and Wayne counties. Both the states of Ohio and Kentucky are connected to the city via bridges that span the Guyandotte River.

As of 2010 Huntington's population was 48,138, and was estimated to have grown to 48,638 in 2015. Roughly 51.4 percent of the population is female, and 48.6 percent is male. 86.9 percent of the city's residents are white, and 8.6 percent are African American. The average age of Huntington's citizens is 35.

The United States Census found that 87.3 percent of people twenty-five and above had graduated high school, and 29.8 percent of people twenty-five and above had obtained a Bachelor's degree or higher.

The most common industries in Huntington by number of employees are Healthcare and Social Assistance (23.8%), Retail and Trade (14.7%), and Educational Services (13.3%). The median household income for in Huntington is $29,149 according to the 2010 census. This is approximately $11,000 below the state's average. Positions that pay the highest were found in the Mining, Quarrying, Oil, Gas Extraction, Transportation and Warehousing, and Utilities fields.

Currently, the city is one of the eight finalists in the America's Best Communities competition sponsored by Frontier Communications, DISH, CoBank and the Weather Channel. Huntington Mayor Steve Williams says, "Huntington, West Virginia, is a community that is poised to uplift our citizens and businesses to a new level of

excellence and growth, overcoming the challenges of manufacturing- and coal-sector decline, to create a 21st century place marked by innovation and collaboration."

In 2016, the USEPA selected the City of the Huntington as a Brownfields Area-Wide Planning Grant Recipient. The City has chosen to specifically focus on the Highlawn Neighborhood, the area where the Site happens to reside. With this grant, Huntington is expected to create a market assessment, infrastructure upgrade plan, land use design, and green infrastructure approaches, along with utilizing community input and leveraging other resources. The grant area centers on properties between the Ohio River and 3rd Avenue from 13th to 27th Street and has also become a part of the City's revitalization plan, also known as the Huntington Innovation Project (HIP). Their first community meeting for public input on the Highlawn Brownfields Redevelopment Plan was on February 28, 2017at the Big Sandy Superstore Arena Conference Center.

Lina Blough is the President of the Highlawn Neighborhood Association. The group's regular monthly meeting takes place at 7 PM on the first Tuesday of each month in the Community of Grace United Methodist Church, located at 225 28th Street in Huntington West Virginia.

The Facility and area of investigation is found in Huntington's 8th Ward, which is represented by Tom McGuffin, who has served since 2012.

ANTICIPATED PUBLIC INTEREST

BASF expects Community interest in the VI assessment activities, especially from residents and property owners in the area of investigation. The property owners/tenants of the buildings in the investigation area represent the intended audience and are considered relevant Stakeholders. We anticipate the greatest interest to be in the area of understanding what VI is, how it is mitigated, and any possible health effects from exposure to any VOCs that might be found at elevated levels. The CRP has been designed with the necessary flexibility to address these issues and accommodate expansions to the investigation should they be necessary.

COMMUNITY RELATIONS GOALS

The goals of this Community Relations Plan include:

- Establish an easy-to-use, reliable feedback loop that provides information to BASF from the Community and Stakeholders, and back out to those same parties.

- Cultivate a transparent working relationship with the Community.

- Ensure an established means for disseminating information and data on a routine and non-routine basis is created and maintained.

- After evaluation and interpretation by the project Team, provide dialogue with the public, keeping the public informed about the project progress and investigative results as they become available.

Key Messages include:

- BASF's number one priority remains the protection of the health of our community, our workers and the environment.

- BASF is committed to remediation in a way that is guided by the best available science and in accordance with state and federal regulatory processes to ensure the protection of human health and the environment.

- BASF will continue to engage expert environmental consultants to help determine the most effective means for safely managing our remediation program and will employ the most qualified and knowledgeable resources to complete the work based on the best information and science available to us.

- BASF will build on cooperative relationships at the federal, state and local level to ensure we meet or exceed all regulatory requirements.

- BASF is committed to sharing project information to relevant Stakeholders in a timely fashion.

METRICS FOR SUCCESS

The Team will continue to monitor the level of effectiveness of the CRP with the following metrics:

Percentage of Contact Between the Team and Residents: The Team will visit 100% of the identified residences to attempt initial contact with the property occupants

and property owners. The Team will make multiple visits until at least 60% initial in-person contact is received.

Percentage Received by Residents: Property owners/tenants that are unable to be reached through initial door-to-door, in-person contact efforts will be informed via certified mail, return receipt requested. Through this process, the Team ensures 100% of property owners/tenants are made aware of the project.

Percentage of Initial Access: The team has set a target of at least 60% access to conduct the initial sampling.

COMMUNITY RELATIONS PLAN IMPLEMENTATION

KEEPING THE COMMUNITY INFORMED

BASF will take several steps to keep the Community informed through active means that will include direct communication as well as making information available to Stakeholders, identified at the end of the CRP.

The CRP is adaptable. By informing local elected and appointed officials, local community members, property owners, etc. from the outset, and establishing open two-way dialogue, we set the foundation for expanding the level of direct communications in consultation with the project team.

Should GeoSytntec advise that further properties beyond the initial ten will need to be tested, then the scope of individual meetings with property owners and community dialogue will expand to include the entire city block bordered by the streets where relevant testing results are gathered.

Public Participation Activities

BASF will conduct activities and has developed tools to provide timely information to the public and encourage ongoing, two-way communication between BASF and external stakeholders about remediation efforts. BASF will distribute an initial project fact sheet to residents and property owners in the investigation area, along with information on the Facility and its history.

Initially, the Team will visit residents or property owners by going door-to-door to the identified residences. Residents and property owners, will receive written notification of upcoming investigations. The Team will have fact sheets, project business cards and the project contact information on hand for interested parties.

Residents and property owners that are unable to be reached through initial door-to-door, in-person contact will be informed via certified mail, return receipt requested. Through this process the Team ensures 100% of residents or property owners have the opportunity to be made aware of the project.

Following are general descriptions of community involvement activities. Additional activities/measures may be implemented to support specific project goals.

Meetings

BASF will provide briefings and presentations on remediation efforts and project status in a variety of forums.

- ***Briefings for Local, State, and Federal Elected/Appointed Officials***

BASF will hold briefings with elected officials on a regular basis to discuss ongoing remediation efforts. BASF will continue the ongoing communication with the City of Huntington, and the 8th Ward. The content of these communications will include Facility and investigation history, on-going work and recent findings, upcoming investigation activities, and copies of outreach materials. BASF will notify local emergency departments of planned activities in advance of the start of those activities. Cabell County Commissioner Jim Morgan will serve as key contact with the county and its representatives for this project.

Since many citizens communicate with the West Virginia Division of Environmental Protection through their local legislators, BASF will also educate those elected officials who represent the immediate area, including Robert "Bob" Plymale, and Mike Woefel, the State Senators representing Cabell County, and Sean Hornbuckle, Carol Miller, and Chuck Romie, the House of Delegates Representatives for the 16th District and this section of Huntington.

- ***Meetings with Citizens and Groups***

BASF proposes to communicate with citizens and citizen groups, including the Highlawn Neighborhood Association, address community concerns or issues, and seek feedback and input about matters that could arise because of ongoing remediation efforts.

Depending on the responses received from the initial contact with the intitial ten property owners, the project Team will host a meeting of all ten property owners and relevant community members to help answer outstanding questions about the sampling program. The goal is to increase the percentage of owners who will sign access agreements and allow sampling to proceed.

BASF will coordinate broader community meetings if the scope of the project expands.

Web site

BASF will maintain a project public web site, www.huntingtonsiteproject.com. The website will host project specific information and provide a feedback mechanism by which to answer citizen and Stakeholder questions in a timely fashion.

- *Voluntary Contact List*

BASF will also establish and maintain a contact list that will be used to keep interested parties informed about activities related to the BASF project. This voluntary list will include nearby residents, elected and appointed officials, local media, and agency contacts. Individuals may opt-out of communications by calling or submitting a request through the project webpage. This list will be used to distribute the public facts sheet. All contact information will be kept confidential and not made available to the general public.

News Releases

BASF will issue news releases and/or community advisories to announce public meetings and pertinent site related information if the project scope warrants this level of community involvement.

Fact Sheets

BASF has developed fact sheets that will be provided to residents, property owners, and other interested parties, as well as being housed in the project information repository at the Cabell-Huntington Public Library. The fact sheet includes information about the facility and its history in the community, background information, an overview of vapor intrusion, and description of the planned investigation activities

Communications materials produced by BASF will include information for the primary points of contact for USEPA. BASF will coordinate with USEPA on communications materials.

During the initial Community outreach, direct communications will be limited to one on one interaction with potentially impacted property owner/tenants to ensure a more personalized and private setting.

Based on additional investigation results and project scope, BASF will consider other means of communicating more broadly with the community, i.e, social media channels.

PUBLIC ACCESS to PROJECT INFORMATION

Information Availability

An information repository will be established at the Cabell-Huntington Public Library located at 455 9th St# 6, Huntington, WV 25701. The Library is located near the Facility. The library's phone number is (304) 528-5700. The library's website is *Cabell Huntington Public Library*

Information available for public access at the library includes final copies of work plans, community relations plan, technical reports, and project fact sheets. This information is also available on the Project's website, www.huntingtonsiteproject.com.

POINTS OF CONTACT

BASF has designated points of contact to provide information to the public on the status of the project and receive input from the Community.

The BASF contacts are:

Vern Burrows
BASF Corporation
Phone: (973) 665-4829
vernon.burrows@basf.com

Roberto "Bob" Nelson
BASF Corporation
Phone: (973) 245-5230
roberto.nelson@basf.com

THE USEPA has designated a project coordinator to disseminate information pertaining to the VI sampling The USEPA contact is:

Leonard Hotham
USEPA Region 3
Mail Code: 3LC10
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-5788
hotham.leonard@epa.gov

The USEPA facility-specific webpage will be updated as the project proceeds. This webpage can be accessed at:
https://www.epa.gov/hwcorrectiveactionsites/hazardous-waste-cleanup-flint-group-pigments-formerly-xsys-print-solutions

The State of West Virginia has designated a project manager that will serve alongside the project coordinator. The West Virginia contact is:

Jason (Jake) McDougal
West Virginia Division of Environmental
Office of Environmental Remediation
601 57th Street
Charleston, WV 25304
304-926-0499 ext. 1130
jason.s.mcdougal@wv.gov

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RCRA Corrective Action and Groundwater
WV DEP Office of Remediation
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Jason (Jake) McDougal
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STAKEHOLDERS LIST

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robert.plymale@wvsenate.gov

Delegate - Sean Hornbuckle – 16th District
Room 150R, Bldg. 1
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Charleston, WV 25305
(304) 340-3395
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Delegate – Carol Miller – 16th District
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Delegate – Chuck Romine – 16th District
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Cabell County Commissioner – Bob Bailey
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750 – 5th Ave.
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(304) 526-8637
*Bob Bailey is the closest commisioner to the Site.

Cabell Co. Commissioner – Jim Morgan
Suite 300 – Courthouse
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Huntington, WV 25701
(304) 526-8635

Cabell County Commissioner – Nancy Cartmill
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Bryan Chambers
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(304) 696-5540

Jim Insco
Public Works Director
(304) 696-5903

Lucian Kimler
General Superintendent – Sanitation and Trash for the City of Huntington
(304) 696-4431

Huntington Sanitation Board
555 7th Ave
Huntington WV, 25701
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Public Works
Inspections and Permints Division
Room 1 at City Hall
Huntington WV, 25701
(304) 696-5905

Scott Damron
City of Huntington Attorney
(304) 696-4480

Tom Bell
Executive Diretor - Huntington Municipal Development Authority
(304) 696-5509

Steve Williams
Mayor of Huntington
(304) 696-5540

Cathy Burns
City Manager of Huntington
(304) 696-5540

Lucian Kimler
Supervisor for the Streets
(304) 696-4431

Chief of Police Joe Ciccarelli
Huntington Police Department
675 10th Street,
Huntington, WV 25701
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Captain Ray Cornwell
Administrative Bureau
Huntington Police Department
675 10th Street
Huntington, WV 25701
(304) 696-4444

Communications Timeline

COMMUNITY INTERACTION STAGE

SCHEDULING OUTREACH– Begins after Approval of Technical Work Plan

Stage 1 (~14 days) – Once approvals are received Orion Strategies will begin to schedule meetings in Huntington.

Stage 2 (~1-2 days) - FACE-T0-FACE MEETINGS

- HUNTINGTON CITY OFFICIALS – Huntington Mayor's Office
  1. EPA Rep.
  2. BASF Rep.
  3. Huntington Mayor, Steve Williams
  4. Huntington City Planner, Cathy Burns
  5. Huntington 8th Ward City Councilman, Tom McGuffin

Goal: Make top City officials aware of the Huntington Project Site and provide them with points of contact for questions.

- CABELL-HUNTINGTON LIBRARY
  Drop off project information.

- LOCAL EMS
  Inform local EMS officials of planned activities.

- COUNTY COMMISSION
  - EPA Rep.
  - BASF Rep.
  - County Commissioner Jim Morgan

- HIGHLAWN HOMEOWNER'S ASSOCIATION – President
  - EPA Rep.
  - BASF Rep.
  - President of Highlawn Homeowner Association, Linda Blough

Goal: Make Association President aware of the Huntington Project Site and provide her with points of contact for questions.

Stage 3 – MEET WITH INITIAL 10 RESIDENTS OR PROPERTY OWNERS

- Members of the Team will visit residents or property owners by going door-to-door. Residents and property owners, will receive written notification of upcoming investigations. Team members will have project business cards and the project contact information on hand for interested parties.

Goals:

- Seek approval to proceed with the sampling.
- Request times in which they are available for sampling
- Collect access agreements
- Add to the contact list to receive updates

Stage 4 – CERTIFIED MAIL PACKAGE

Residents and property owners that the Team is unable to reached in person through door-to-door contact will be sent a certified return receipt mailing that will include:

- Project Letter
- Fact Sheet
- Access Agreement

Goals:

- Provide information about the Facility Project
- Seek approval to proceed with the sampling.
- Request times in which they are available for sampling
- Collect access agreements
- Add to the contact list to receive updates

Sending the mailing certified return receipt grantees all property owners and residents have the opportunity to learn about the Facility project.

Stage 5 - CONTACT OTHER ELECTED OFFICIALS

- Meet with other elected officials such as Senators Bob Plymale and Mike Woefel, Delegates Sean Hornbuckle, Carol Miller, and Chuck Romine.

Stage 6 – FOLLOW UP MEETING WITH PROPERTY OWNER(S)

- Based on initial responses from property owners, the Team will also consider further meetings with property owners and community members to answer questions and seek feedback about the sampling proposal.
  - Poster Boards

Stage 7 - SCHEDULE SAMPLING

- After approval from property owners is received, the Team will schedule sampling.

Stage 8 - CONDUCT SAMPLING

- Install sample ports
- Conduct leak test
- Sample Residence
- Remove ports
- Seal holes
- Ensure contact information for resident is correct (information will need to be updated with project team.)

Stage 9 - MEETING WITH PROPERTY OWNERS

- Mail follow-up letter to property owners whose properties were sampled and schedule time to review results in person with a member of the project team.

Stage 10 - FOLLOW UP WITH PROPERTY OWNERS WHO DID NOT RESPOND TO INITIAL LETTER OR ATTEND MEETING

- Mail follow up letter to property owner requesting they participate in the sampling program.

  Follow the same meeting, scheduling and sampling process as above.