

August 24, 2021

Ms. Nikki White, Program Manager
Disaster Recovery Division
Mississippi Development Authority
P. O. Box 849
Jackson, Mississippi 39205

Re: Ingalls Avenue Roadway Improvements KCDBG R109-290-06 KCR request to include a Phase II ESA proposed addition of work to project scope

Dear Ms. White:

As we discussed on the phone, I am seeking pre-approval (or assurance) from MDA for including the funding of a Phase 2 ESA (environmental site assessment on the east side of Market Street / Ingalls Avenue intersection and progressing east for 300 feet. The cost for conducting the Phase II ESA is \$9,200.00 (see attached copy of cost proposal). Due to currently projected underruns in water/sewer lines and street & road map improvements this Phase II ESA can be done with the existing funds (no funds increase request at this time).

Need for the Phase II ESA

In order to obtain MDA approval to our request to extend work 250 feet along Ingalls Avenue (refer to our letter to MDA dated August 9, 2021) we needed to ensure that the work was within the approved environmental review area. During my review of the Phase I ESA that was done for this project, I realized that the proposed additional work may be affected by a recognized environmental concern noted in the Phase I report. The Phase I report noted that any subsurface work at the eastern side of the Market Street intersection and continuing east along Ingalls until the drainage ditch may encounter detectable levels of contaminants from a former service station and a former dry cleaner. The report noted that a Phase II ESA would be advisable if subsurface work were to be performed in that area. I contacted the environmental consultant who performed the Phase I ESA and reviewed the report and the proposed work with him. The consultant had performed ESA work on one of the sites prior and was familiar with the environmental investigations and remediation work done by other consultants on these sites and was able to provide me with copies of the other investigations as well as the results of environmental remediation work performed in 2019. The reports show contaminants that vary greatly in the level of detectable quantities between each sample / monitoring location (some with only a few feet of separation) from barely detectable to high concentrations. The remediation work to address the site of the leaking underground storage tank showed a significant decrease in contaminant levels around where the tank had been located and showed an increase of levels just outside of the area of remediation. No one can state what the levels of contamination might be where work is proposed, just offsite. No one can state at what depth detectable levels of contaminants might be found offsite. Therefore, a Phase II ESA (drilling and sampling) is recommended with the samples being collected in a line adjacent to where utilities are proposed and between the areas of detected levels of contaminants and the proposed work area.

July 16, 2020

It is also possible that contaminants may have moved into the ground under the intersection which could present a hazard to the current contract work. As noted above, the remediation work may have pushed some contaminants farther away. Even if the proposed additional work were not to be allowed, we are now aware that work in the current project area, near the project limit, may be affected.

Proposed increase / alteration in project scope

At this time, it is not known if a request for funding increase may be forthcoming. Until the Phase II ESA is performed, and the sampling results are known, we don't know what level of effort will follow. We do know that a request for project time extension will be forthcoming as this situation and other unforeseen situations have delayed the Contractor in a way that is beyond his control. Once the Phase II ESA is performed then we will be able to determine what additional construction and engineering work would be required and what that may cost.

I have directed the Contractor to not perform any work in the intersection until the results of the Phase II ESA are known and any necessary remediation planning completed. This will require the Contractor to alter his schedule and perform work that is west of the intersection only.

Initial request

We (the City and Overstreet) request that a Phase II ESA be performed and that the cost be considered allowable under the existing project (R109-290-06KCR) funds.

If MDA agrees that the proposed increase in scope (without an increase in funding at this time) would be allowable, then the environmental consultant's proposal will be accepted by the City and the consultant given the go-ahead to perform the Phase II ESA.

I look forward to your response to my request.

Sincerely,

James (Jim) MacLellan, P.E.

Attachment