



January 27, 2005

Mr. Gerald Cound
Director of Facilities Management
Heifer Project International
1015 Louisiana Street
Little Rock, AR 72202

Dear Mr. Cound:

The Arkansas Department of Environmental Quality (ADEQ) and United States Environmental Protection Agency (EPA) Region 6 together have determined that the Heifer Project International (HPI) site in Little Rock, Arkansas is Ready for Reuse. A Ready for Reuse Determination is an acknowledgment that environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use.

The HPI site is located approximately 800 feet south of the Arkansas River, just east of Interstate 30 at Shall Street and Industrial Drive, Little Rock, Pulaski County, Arkansas, and consists of approximately 28 acres. The site is bordered to the west by the Clinton Presidential Library Project and to the north by 2nd Street. A variety of commercial and industrial businesses are located immediately south and east of the property.

The HPI site, located in downtown Little Rock, is being developed into the Heifer International Center (HIC) and Global Village education complex. The HIC and Global Village are being built on an industrial Brownfields site. The HPI site was assembled from multiple real estate parcels. HPI identified two specific parcels in the 28-acre site that, based on historical operations, had actual or perceived hazardous substance contamination to be placed under the Brownfields program. These two Brownfields parcels consist of the former Union Pacific Railroad (UPRR) rail yard, and the former Superior Trucking Company property. The UPRR parcel is a 5.6-acre tract of land that was used as a rail yard since before 1900 until its abandonment in the mid-1990s. The former Superior Trucking Company parcel is a 3.97-acre tract of land, first developed as a motor freight station in the 1940's, that continued as a freight or trucking terminal until 2003. The remainder of the HPI site consists of the former Harbor, Best Metal, Gray, Central Transport, and Pfeifer Plumbing and Heating properties.

The entire HPI site has been used for industrial and commercial purposes for over 100 years. The site previously contained various metal and brick buildings, concrete slabs and abandoned railroad tracks; however, all of the structures have been demolished and the railroad tracks removed. The site, when fully developed, will include a four-story "green" office building serving as the World Headquarters for the Heifer Project International organization, an education complex including the Global Village with an outdoor replication of villages from the countries where Heifer Project International provides aid, and a constructed wetland ecosystem which will significantly increase downtown greenspace.

The environmental investigation of the Brownfields property included a Comprehensive Site Assessment (CSA) associated with a Targeted Brownfields Assessment completed in August 2003. The CSA was performed by ADEQ in partnership with EPA to determine the necessary actions required to protect human health and the environment. The objectives of the CSA were to define waste characteristics, contaminant sources, and to identify potential exposure pathways by collecting and analyzing soil and groundwater samples. The CSA was developed, in part, utilizing previous site investigation work conducted at the HPI site by Heifer. On March 12, 2004, the ADEQ issued a final Property Development Decision Document (PDDD) that outlined the final remedy for the UPRR and Superior Brownfields properties. The PDDD is a part of a Brownfields Implementing Agreement between HPI and the ADEQ for the Superior Trucking and the UPRR properties. Remediation of site contaminants for these areas took place in two phases. The first phase involved excavation and hauling of contaminated fill material from the UPRR property and proper disposal at the City of Little Rock Landfill. In addition, on the Superior property, all existing contaminated fill material excavated in the area of the new building foundation and the constructed wetlands, as well as excavated contaminated material from two trench locations, were disposed of properly at the City of Little Rock Landfill. The second phase involved excavation and transport of contaminated fill material from the two hot spots at the UPRR and the Superior properties and proper disposal of the material at the City of Little Rock Landfill.

In conjunction with the CSA, petroleum storage tank investigation and cleanup activities were also conducted on the Gray and Pfeifer portions of the HPI site under the auspices of the ADEQ Regulated Storage Tanks Division. In January 2004, ADEQ proposed a draft Corrective Action Plan to address the investigation and cleanup of several abandoned gasoline and diesel fuel tanks, associated piping, and contaminated soils that remained on these sites. On April 16, 2004, ADEQ issued a final Corrective Action Plan that identified all requirements necessary for closure of these areas and, on April 28, 2004, ADEQ approved the final cleanup and closure of the fuel tank areas. In addition, voluntary soil investigation and cleanup activities were conducted on the Central Transport, Gray and Pfeifer portions of the site, following the procedures for the Superior and UPRR sites. (Future excavations of soil containing site-related contaminants above ADEQ cleanup standards shall also be disposed of properly at a permitted landfill.) Lastly, groundwater was investigated site-wide and no constituents of concern found to be above ADEQ cleanup standards.

With this Ready for Reuse Determination, ADEQ and EPA Region 6 agree that Heifer has successfully completed its investigation and remediation pursuant to the Final Property Development Decision Document dated March 12, 2004, 2004 specifically related to the remedial activities necessary on the Brownfields property, and the Leaking Underground Storage Tank Corrective Action Plan dated April 16, 2004. The Ready for Reuse Determination, which affirms that environmental conditions at the Brownfields properties and underground storage tank sites are protective of human health and the environment based on their current and anticipated future use as a commercial/industrial operation, is based on a review of the following documents (the "Documentation"): Targeted Brownfields Assessment for Heifer Project International Comprehensive Site Assessment Report (August 2003); Heifer International Center Human Health and Ecological Risk Evaluation (September 8, 2003); Brownfields Property Development Plan (November 11, 2003); Final Property Development Decision Document (March 12, 2004); Leaking Underground Storage Corrective Action Plan (April 16, 2004); Central Transport/Gray Property/Pfeifer Plumbing & Heating Closure Report (April 28, 2004);

Closure Report Cistern Stockpile (February 9, 2004); Closure Report Fill Material Disposal (April 19, 2004); and Closure Report Hot Spot Areas (February 28, 2004). Copies of the Documentation may be obtained from ADEQ or Heifer International at the addresses provided in Enclosure 1.

Information concerning the current environmental conditions of the HPI site (i.e., concentrations of contaminants present and their associated risks) and risk management activities conducted to ensure protectiveness are summarized in Enclosure 2. If conditions at the site change, including environmental conditions, land use, site receptors, and remedy performance, it will be necessary to revisit this determination of suitability for reuse to ensure its continuing protectiveness.

Congratulations on this most noteworthy accomplishment!

Sincerely yours,

Marcus C. Devine
Director
Arkansas Department of Environmental Quality

Richard E. Greene
Regional Administrator
EPA Region 6

Enclosures

**ENCLOSURE 1
AGENCY CONTACTS**

For information concerning the Ready for Reuse Determination, please contact:

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Media inquiries should be directed to the ADEQ Customer Service Division at (501) 682-0923, or to the EPA.

ENCLOSURE 2
Current Environmental Conditions Table
for Heifer Project International

Name	Remedial Action Taken	Residual Contaminants of Concern (COCs)	Cleanup Status	Cleanup Standard	Institutional Control(s) (Type/Purpose /Location)
Union Pacific Rail Road Property (UPRR)	Dig and haul all contaminated fill material for offsite disposal	PAHs	Completed in 2004	Benzo(a)pyrene 12 mg/kg, Benzo(b)fluoranthene 14 mg/kg, Dibenz(a,h)anthracene 3.5 mg/kg, Benzo(a)anthracene 13 mg/kg	Brownfields Implementing Agreement to ensure proper disposal of excavated material within the property
Hot Spot	Dig and haul a lead contaminated hot spot	Lead	Completed in 2004	Lead in soil exceeding 1400 mg/kg	
Superior Property	All contaminated fill material excavated in the area of building foundations, ditches, and wetland was removed from the site.	PAHs	Completed in 2004	Benzo(a)pyrene 12 mg/kg, Benzo(b)fluoranthene 14 mg/kg, Dibenz(a,h)anthracene 3.5 mg/kg, Benzo(a)anthracene 13 mg/kg	Brownfields Implementing Agreement to ensure proper disposal of excavated material within the property
Hot Spot	Dig and haul a hot spot contaminated with elemental mercury	None	Completed in 2004	Presence of any trace of elemental mercury	
Underground Storage Tanks and Equipment	Tanks, piping, and petroleum-contaminated soil were removed and disposed of off-site	Below 1000 TPH (GRO)	Completed in 2004	TPH (GRO) exceeding 1000 mg/kg	
Asbestos Containing Material	All ACM was removed prior to demolition of buildings	None	Completed in 2003		
Groundwater (Site-wide)	Groundwater at the site was investigated by sampling several monitoring wells and boreholes	Gasoline constituents below standards	No remedial action was needed. All monitoring wells and bore holes were removed	Indoor air standards and free product recovery	N/A
Gray and Pfeifer Sites Underground Storage Tanks and Equipment	Tanks, piping, and petroleum-contaminated soil were removed and disposed of off-site	Below 1000 TPH (GRO)	Completed in 2004	TPH (GRO) exceeding 1000 mg/kg	N/A