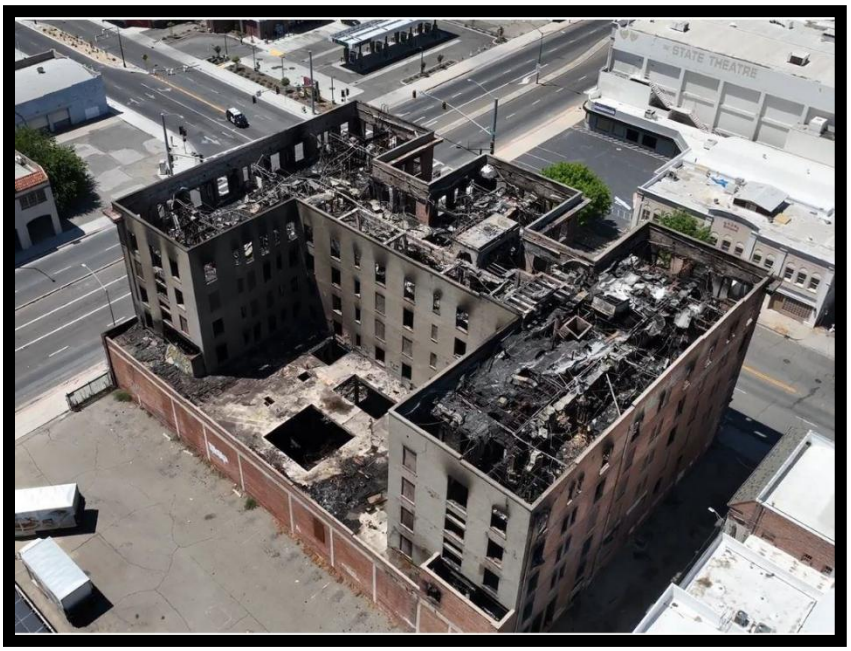
Draft Analysis of Brownfield Cleanup Alternatives for Hotel Marysville

420 5th St, Marysville, CA 95901



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EXECUTIVE SUMMARY

This report presents an Analysis of Brownfield Cleanup Alternatives (ABCA) for the abatement of hazardous building materials at 420 5th St, Marysville, California (Site), as shown on Figure 1. The status of the Site is listed as "awaiting cleanup".

This ABCA has been prepared to support an application for EPA Brownfields Cleanup funding and is structured to demonstrate strong alignment with EPA evaluation criteria, including protection of human health and the environment, community need, project readiness, leveraging of resources, and consistency with the City's planned redevelopment and sustainability goals. The recommended alternative integrates physical cleanup with confirmatory investigation to ensure the Site is suitable for reuse and to minimize uncertainty that could otherwise hinder redevelopment and community revitalization.

The City of Marysville recommends Alternative #4 – Combined Cleanup with Confirmatory Investigation as the preferred remedy. This alternative best satisfies EPA Brownfields Cleanup Grant evaluation criteria by protecting human health and the environment, addressing community need, supporting reuse and revitalization of a long-vacant downtown site, demonstrating readiness for cleanup, leveraging prior City investments, and enabling sustainable, resilient redevelopment.

I. Introduction & Background

a. Site Location (address)

The site is located at 420 5th Street in Marysville, California (herein referred to as "the Site") as shown in Figure 1 below.

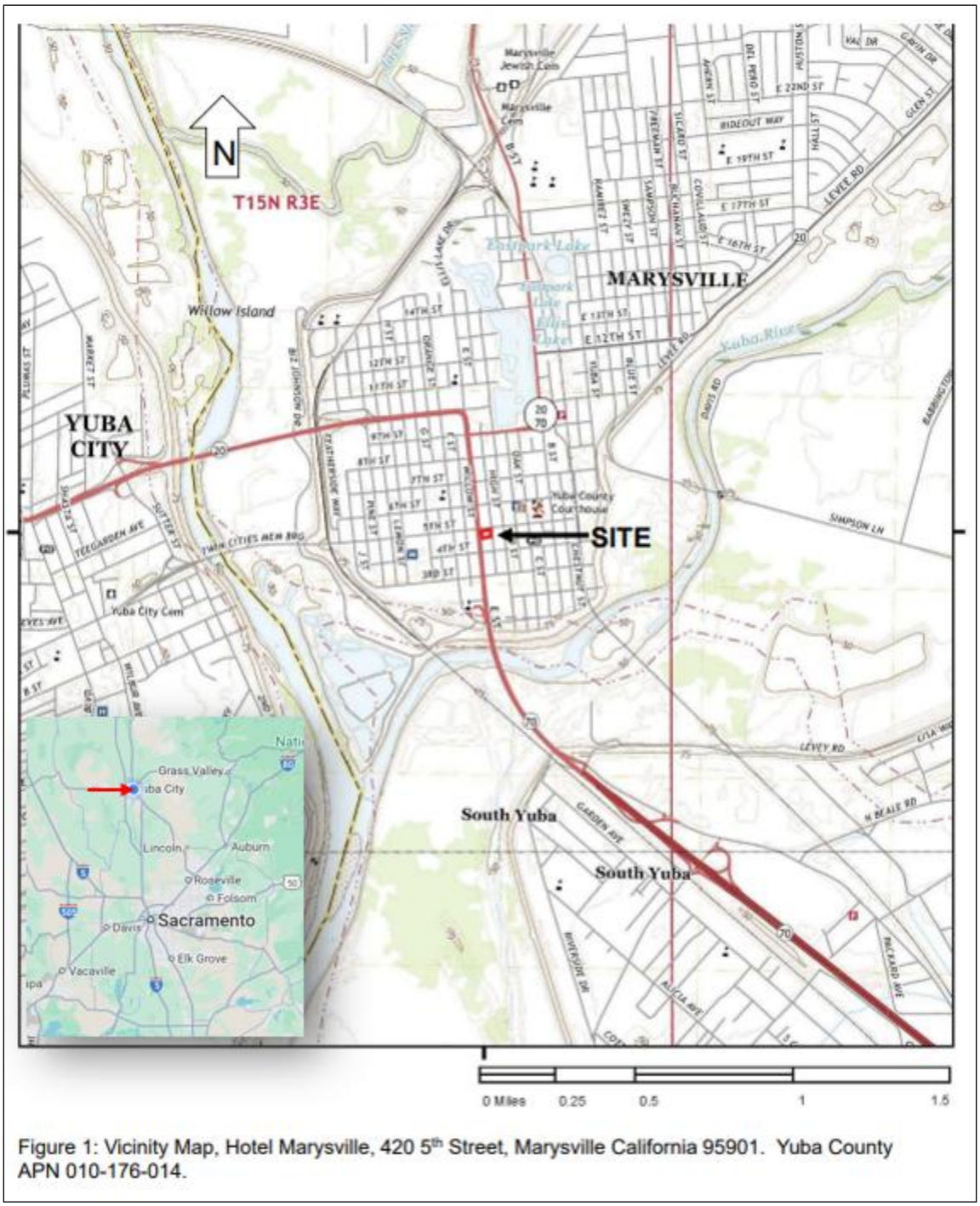

Figure 1: Vicinity Map, Hotel Marysville, 420 5th Street, Marysville California 95901. Yuba County APN 010-176-014.

b. Previous Site Use(s) and any previous cleanup/remediation

The Marysville Hotel, located at 420 5th Street, Marysville, CA, presents significant brownfield challenges due to its history of neglect, fire damage, and hazardous material contamination. Originally built in 1925, the hotel has been vacant for four decades and is now severely structurally compromised, particularly after a fire on June 15, 2024. The fire caused substantial damage to the interior, resulting in the loss of the wooden roof structure and widespread destruction across all six floors. Following demolition, remaining debris, including contaminated brick, concrete, and other hazardous material was sealed under a layer of gunite (spray applied concrete) as an interim containment measure. Permanent cleanup, as described in Alternative 1, remains necessary.

The Site was the former location of a luxury hotel. It was built in 1925 and opened business as a hotel in 1926 but closed in the late 1970s. Since then, a series of owners have tried to redevelop the Hotel Marysville with many great concepts such as a brewery and condos. However, none have been able to make the financial numbers work out and the building sits vacant and boarded up to this day – over 40 years after the Hotel Marysville closed.

Asbestos and lead were common construction materials in the early 1920s, and their negative environmental health impacts were not readily known at that time. As such, piping, paint and heating infrastructure contains these hazardous materials up to the Hotel Marysville's closing in the late 1970s. No known clean-up or remediation have been done as the building has ownership many times.

c. Site Assessment Findings (briefly summarize the environmental investigation that have occurred at the site, including what the Phase I and Phase II assessment reports revealed in terms of contamination present, if applicable)

Prior to taking ownership of the parcel, the City of Marysville hired Marcus H. Bole & Associates to perform the Phase I Environmental Site Assessment (ESA). The ESA was in general conformance with the scope and limitation of the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments E 1527-21, and the Environmental Protection Agency Standards and Practices for All Appropriate Inquires (AAI) (40 CFR Part 312) for the Marysville Hotel, Assessor Parcel Number (APN) 010-176-014.

A survey of the building conducted in May of 2022 by Adam Labs, Inc. identified over 5,000 square feet of Friable Asbestos Containing Material and Non-Friable Asbestos Containing Material within the Insulation, cloth wrap, sprayed on acoustic, putty, vinyl floor tile and black mastic (See Appendix F: Asbestos Report by Adam Labs, Inc.) The

fire resulted in a potentially significant amount of asbestos containing material being released to the environment. This release represents a Recognized Environmental Condition. According to the City Engineer, the building utilized a boiler and fuel oil tank(s) located in the basement. The fire destroyed the basement area with a potential release of petroleum hydrocarbons into the environment, a Recognized Environmental Condition.

Conceptual Site Model (CSM)

Contaminant of Concern (COC)	Status	Source / Area of Concern	Key Data / Basis	Exposure Pathways / Receptors	Cleanup / Corrective Objective
Asbestos-Containing Materials (ACM)	Confirmed	Former building materials; demolition debris stockpile capped with gunite	>5,000 sf ACM identified by Adams Labs; fire release per Phase I ESA	Inhalation of fibers/dust; workers, nearby community, site visitors	Remove and properly dispose of ACM per NESHAP and state regulations
Lead-Based Paint (LBP)	Confirmed (assumed)	Painted structural components and debris stockpile	Building age (1920s) and Phase I ESA	Dust inhalation/ingestion; workers and future occupants	Remove LBP-impacted materials; verify soils meet risk-based standards
Petroleum Hydrocarbons (TPH-d)	Confirmed	Former basement boiler and fuel tank area; underlying soils/groundwater	Phase II: soil up to 130 mg/kg; groundwater 0.27 mg/L	Soil contact, vapors, groundwater during excavation; workers/future occupants	Delineate and remediate to DTSC/EPA risk-based standards
PAHs	Confirmed (localized)	Fire-impacted debris and soils	Detected below residential screening in SB-4	Soil contact/dust; workers and future occupants	Confirm remain below screening; remove if

					exceedances found
Demolition Debris / Residuals	Confirmed	Approx. 4,700 CY debris stockpile; remaining basement	Phase II documented stockpile and data gap beneath basement	Dust, runoff, direct contact; workers/environment	Remove debris and basement; perform confirmatory sampling

Summary of Environmental Site Assessment Findings

Environmental site assessments have been completed for the former Hotel Marysville property to characterize environmental conditions and inform cleanup planning. These investigations include a Phase I Environmental Site Assessment (ESA), an asbestos survey and abatement plan, and a Phase II Environmental Site Investigation (ESI).

Phase I ESA (Marcus H. Bole & Associates, October 2024)

A Phase I ESA was conducted in general conformance with ASTM E1527-21 and EPA All Appropriate Inquiries (AAI) standards. The assessment identified the following Recognized Environmental Conditions (RECs):

- Asbestos-Containing Materials (ACM): A prior building survey documented more than 5,000 square feet of friable and non-friable ACM in insulation, pipe wrap, sprayed acoustics, flooring, and mastics. The June 2024 fire likely resulted in a significant release of asbestos fibers to the environment, representing a REC.

- Petroleum Hydrocarbons: Historical use of a boiler and fuel oil tank in the basement presents a REC for potential petroleum releases to soil and groundwater.

The Phase I ESA concluded that these RECs warranted further subsurface investigation through a Phase II ESA.

Asbestos Survey and Abatement Plan (Adams Labs, July 2024)

An asbestos survey and abatement plan prepared following the fire confirmed extensive friable asbestos-containing materials throughout the structure, including thermal system insulation, pipe wrap, sprayed-on acoustics, and other building materials. The report concluded that the building and associated debris must be treated as asbestos-contaminated and removed and disposed of in accordance with applicable federal and state regulations prior to redevelopment.

Phase II Environmental Site Investigation (A&M Environmental Services, December 2025)

A Phase II ESI was performed to evaluate potential impacts from historic hotel operations and the former fuel oil tank. The investigation included advancement of soil borings and collection of soil and groundwater samples around the perimeter of the demolition debris stockpile.

Key findings include:

- Site Conditions: The property currently consists of an approximately 4,700-cubic-yard stockpile of demolition debris, capped with gunite and surrounded by fencing. The former basement and foundation remain in place beneath the stockpile.

- Sampling Limitations: Borings proposed through the debris pile and basement could not be completed because loose debris collapsed into the boreholes. As a result, sampling was limited to the perimeter of the debris stockpile, and soils and groundwater beneath the former basement and fuel tank area could not be directly assessed.

- Soil Results:
    - Total petroleum hydrocarbons as diesel (TPH-d) were detected in soil at concentrations up to 130 mg/kg (SB-5 at 16 feet bgs).
    - Motor oil was detected up to 61 mg/kg (SB-4 at 16 feet bgs).
    - Several polycyclic aromatic hydrocarbons (PAHs) were detected in one soil sample (SB-4 at 16 feet bgs), including fluoranthene and chrysene, at concentrations below residential screening levels.
    - All other analytes were below laboratory reporting limits.

- Groundwater Results:
    - TPH-d was detected in groundwater at 0.27 mg/L (270 µg/L) in sample SB-4, which exceeds the San Francisco Bay Regional Water Quality Control Board direct-exposure human health screening value of 150 µg/L.
    - All other groundwater constituents were below reporting limits.

Consultant Conclusions: A&M Environmental Services concluded that the property has been impacted by historic operations. Although conditions do not pose an immediate threat, the site has not been fully assessed due to sampling limitations, and further investigation is warranted following removal of the debris stockpile and demolition of the basement to adequately characterize underlying soils and groundwater.

Overall Assessment Summary

Collectively, the Phase I ESA, asbestos survey, and Phase II ESI confirm that:

- ACM and lead-based materials are present within the demolition debris and represent a significant source requiring removal and proper disposal;
- Petroleum hydrocarbons have impacted soil and groundwater in the vicinity of the former basement and fuel tank area;
- Data gaps remain beneath the debris pile and basement due to physical access constraints; and
- Additional investigation following debris and basement removal is necessary to fully delineate contamination and support final cleanup decisions.

These findings directly support the need for a cleanup approach that integrates debris removal, basement demolition, and confirmatory investigation to ensure the Site is protective of human health and the environment and suitable for the planned redevelopment.

Summary of Exposure Conditions:

Under current conditions, the primary exposure risks are to cleanup and construction workers through direct contact with debris and underlying soils and inhalation of dust during disturbance. Potential secondary pathways include stormwater runoff from the adjacent parking lot and migration of contaminants during excavation activities. The Site is fenced and capped, limiting current public exposure; however, permanent removal and verification are necessary to eliminate risks and support redevelopment.

Cleanup Objective:

Eliminate exposure pathways by removing ACM- and LBP-impacted demolition debris, addressing petroleum-impacted soils and groundwater, and confirming that residual soil and groundwater conditions meet DTSC/EPA risk-based cleanup standards protective of the planned commercial mixed-use with housing reuse.

d. Project Goal (site reuse plan)

The City of Marysville has actively pursued opportunities to revitalize the former Hotel Marysville site, aiming to transform this centrally located area into a vibrant, multifaceted community hub. Recognizing the site's strategic position and potential impact, the city designated it as a high-priority area for mixed-use development in its upcoming General Plan. This plan envisions a blend of affordable and workforce housing, commercial and office spaces, entertainment facilities, and a transit-centered mobility hub to encourage public transit and pedestrian connectivity, supporting both residents and businesses.

In recent months, Marysville has engaged in collaborative discussions with several developers and organizations to bring this vision to life. These discussions have included prominent entities like Habitat for Humanity, Adventist Health, and The Yuba Water Agency. Each organization brings unique strengths and resources that align with the city's objectives for a diverse and sustainable redevelopment project.

Once the cleanup of the Hotel Marysville site is complete, the proposed revitalization project is expected to stimulate significant economic development in the downtown area. The site will be reuse-ready for commercial mixed-use with housing. It will likely attract businesses and investors, contributing to increased job creation and the development of residential units, retail spaces, and services that cater to both residents and visitors. This will directly support the goals of the Downtown Marysville Specific Plan, which seeks to transform the area into a thriving commercial and residential hub, fostering a sense of community and enhancing the local economy.

See Figure 2 below of a Mobility Hub concept at the site of the burnt Hotel Marysville.

Figure 2: Mobility Hub at SE Corner of 5th St and E St/SR-70 (former Hotel Marysville site)

Additionally, the redevelopment of the site will contribute to improving the city's climate resilience by promoting walkable, mixed-use developments that reduce reliance on vehicular transportation. This supports the city's broader goals of reducing greenhouse gas emissions and improving local climate adaptation and mitigation capacity, particularly considering the risks posed by Marysville's location in a floodplain. Through thoughtful redevelopment that incorporates green infrastructure and sustainable design, the project will also help protect community investments and ensure a more resilient future for Marysville.

e. Regional and Site Vulnerabilities

According to the California's Fourth Climate Change Assessment, Sacramento Valley Region Report, published by the State of California Department of Resources, general summary of climate risks facing the Sacramento Valley Region include:

- Warming air and water temperatures
- More extreme heatwaves
- Drier landscapes
- Less snow
- Variable precipitation and seasonal shifts
- More intense droughts and floods with less predictability

- Higher Delta water levels compounded by subsidence
- Increased risk of wildfire
- Loss of ecosystem habitat

According to FEMA Flood Zone Maps, the Site is located within area with reduced flood risks due to levee. See Notes Zone X.

The site receives stormwater discharge from the adjoining parking lot to the south. Under current Site conditions, increased precipitation and extreme weather could result in additional stormwater runoff and potential erosion to the Site from the mostly impermeable parking lot area.

Based on the nature of the Site and its proposed reuse, changing temperature, rising sea levels, and wildfires, are not likely to significantly affect the Site.

II. Applicable Regulations and Cleanup Standards

a. Cleanup Oversight Responsibilities (identify the entity, if any, that will oversee the cleanup, e.g., the state, Licensed Site Professional, other required certified professional)

The cleanup will be overseen by the California Department of Toxic Substances Control (DTSC), with coordination from the U.S. Environmental Protection Agency, Region 9, and the appropriate Regional Water Quality Control Board (RWQCB), as applicable.

b. Cleanup Standards for major contaminants (briefly summarize the standard for cleanup e.g., state standards for residential or industrial reuse)

The City of Marysville will implement cleanup standards that are protective of the planned commercial mixed-use redevelopment with housing. Cleanup will be designed to meet applicable U.S. EPA and California Department of Toxic Substances Control (DTSC) risk-based screening levels and guidance, and Regional Water Quality Control Board (RWQCB) criteria for groundwater. Given the inclusion of residential uses, cleanup will be protective of the most sensitive reasonably anticipated receptors, including future residents, through attainment of residential screening criteria or DTSC-approved site-specific risk-based cleanup goals. Engineering and/or institutional controls may be incorporated, as appropriate, to ensure long-term protectiveness.

For demolition and asbestos abatement activities, the National Emission Standards for

Hazardous Air Pollutants (NESHAP) and applicable state and local regulations will be followed.

c. Laws & Regulations Applicable to the Cleanup (briefly summarize any federal, state, and local laws and regulations that apply to the cleanup)

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, Clean Air Act, Clean Water Act, in addition to state and local environmental laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed.

In addition, all appropriate permits (e.g. notify before you dig, Caltrans encroachment permit) will be obtained prior to work commencing.

Cleanup Objectives

The overall cleanup objective for the Site is to eliminate exposure pathways and achieve soil and groundwater conditions that are protective of human health and the environment and suitable for the planned commercial mixed-use redevelopment with housing.

Cleanup activities will be implemented in accordance with applicable federal and State of California regulations and guidance, including U.S. EPA and California Department of Toxic Substances Control (DTSC) risk-based screening levels and Regional Water Quality Control Board (RWQCB) criteria for groundwater. Given the planned inclusion of residential uses, cleanup will be designed to be protective of the most sensitive reasonably anticipated receptors, including future residents, through either attainment of residential screening criteria or implementation of site-specific risk-based cleanup goals approved by the lead regulatory agency.

Where appropriate, engineering and/or institutional controls may be incorporated to ensure long-term protectiveness and consistency with the approved land use and will be documented as part of regulatory closure.

Cleanup Oversight and Regulatory Closure

Cleanup activities at the Site will be conducted under the oversight of the California Department of Toxic Substances Control (DTSC), with coordination from the appropriate Regional Water Quality Control Board (RWQCB) for groundwater-related issues, as applicable. The City will retain a qualified environmental professional to prepare and implement a Cleanup Plan, Sampling and Analysis Plan/Quality Assurance Project Plan (SAP/QAPP), and Health and Safety Plan (HASP) consistent with DTSC and EPA requirements.

Upon completion of cleanup and confirmatory sampling, a Cleanup Completion Report will be submitted to the lead regulatory agency for review. Regulatory closure is anticipated to be documented through issuance of a No Further Action (NFA) or equivalent closure letter, or other written concurrence, confirming that the Site meets applicable cleanup objectives and is suitable for the approved reuse. All approved plans and closure documentation will be included in the Site's administrative record.

III. Evaluation of Cleanup Alternatives

a. Cleanup Alternatives Considered (minimum two different alternatives)

The cleanup alternatives were developed to meet EPA Brownfields Cleanup Grant objectives by:

1) eliminating exposure pathways to contaminants of concern;
2) enabling timely and protective reuse of a prominent downtown brownfield;
3) maximizing readiness for redevelopment; and
4) ensuring that cleanup decisions are informed by site-specific data generated through the Phase II Environmental Site Investigation.

- **Alternative #1 – Remove Demolished Building Debris (Phase II Cleanup):** Removal and offsite disposal of approximately 4,700 cubic yards of stockpiled demolition debris currently capped with gunite, completing the abatement initiated under Phase I demolition activities.
- **Alternative #2 – No Action:** Leave debris stockpile and underlying conditions in place with no further investigation or remediation.
- **Alternative #3 – Conduct Additional Phase II/III Site Investigation Prior to Final Cleanup:** Following removal of debris and demolition of the remaining basement, perform additional subsurface soil and groundwater investigation to fully delineate petroleum hydrocarbon impacts identified in the Phase II ESI, and evaluate the need for targeted remediation.
- **Alternative #4 – Combined Cleanup with Confirmatory Investigation:** Remove debris stockpile and basement structure (as in Alternative #1), followed by confirmatory soil and groundwater sampling to verify whether residual contamination remains and implement limited remediation if required.

b. Cost Estimate of Cleanup Alternatives (briefly discussion of the effectiveness, implement ability and a preliminary cost estimate for each alternative)

To satisfy EPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

Effectiveness – Including Vulnerability/Resiliency Considerations

- Alternative #1: remove demolished building debris:

  This alternative is a Phase 2 – Clean Up alternative continuation of Phase 1 that demolished the entire building and covered up the debris pile with a gunite cap. Phase 2 would complete the abatement process by transporting the debris to a landfill. Alternative 1 is cost effective in that the site remediation would be complete, and the hazardous materials are carried outside the city limits along with the demolished debris.

- Alternative #2: No Action:

  No Action is not effective in controlling or preventing the exposure of receptors to contamination at the Site.

- Alternative #3 – Additional Investigation:

  Effective for defining the full extent of subsurface impacts prior to final remedy selection, reducing uncertainty and risk of unforeseen contamination during redevelopment. Does not itself remove contaminants.

- Alternative #4 – Cleanup with Confirmatory Investigation:

  Highly effective in addressing known hazards while providing post-removal verification that residual soils and groundwater meet cleanup standards, ensuring suitability for redevelopment.

Implementability

- Alternative #1: Removing the already demolished building debris (done in Phase 1) is easily implemented as the major demolition work was already done in Phase 1. This would be a transportation of hazmat and debris offsite to a landfill project.
- Alternative #2: No Action is easy to implement since no action will be conducted.
- Alternative #3: Readily implementable following debris and basement removal; requires drilling, sampling, and regulatory coordination but minimal site disturbance.
- Alternative #4: Implementable as an extension of Alternative #1, integrating investigation into cleanup sequencing with minor additional mobilization.

Cost (Order-of-Magnitude Estimates)

- Alternative #1: To remove the demolished building debris is estimated to be $3,226,000.
- Alternative #2: There will be no cost under Alternative 2.
- Alternative #3: Estimated $150,000 – $300,000 for additional borings, laboratory analysis, reporting, and regulatory coordination.
- Alternative #4 (Recommended): $3,935,720 for additional remediation, Combined Cleanup with Confirmatory Investigation, reporting, Foundation Removal, and Site Restoration.

These costs are based on the City's 12-22-25 Engineer's Estimate of Probable Cost for Phases 2 and 3 (debris removal through site restoration) and represent planning-level, order-of-magnitude estimates.

Cost Basis and Assumptions

The cost estimates presented for each cleanup alternative are planning-level, order-of-magnitude estimates developed based on available site data, recent demolition quantities, and professional judgment. Key assumptions include:

- Approximately 4,700 cubic yards of demolition debris will require off-site disposal.
- Debris will be profiled and segregated into hazardous and non-hazardous waste streams in accordance with disposal facility acceptance criteria.
- Haul distances and disposal fees are based on currently available permitted facilities within the region.
- Basement demolition will be required prior to confirmatory subsurface investigation.
- Dust control, air monitoring, and erosion/sediment controls will be implemented during debris removal and excavation.
- Confirmatory soil and groundwater sampling will be conducted following debris and basement removal to evaluate underlying site conditions.
- Costs include contractor mobilization and demobilization, traffic control, and site management.
- A contingency allowance is included to address uncertainties associated with waste characterization and subsurface conditions that may be encountered during cleanup.
- Final costs will be refined during preparation of the Cleanup Plan and contractor bidding.

c. Recommended Cleanup Alternative

The recommended cleanup approach is **Alternative #4 – Combined Cleanup with Confirmatory Investigation**.

This alternative builds upon Alternative #1 by removing the stockpiled debris and remaining basement structure while incorporating post-removal soil and groundwater sampling to confirm whether petroleum hydrocarbon impacts identified during the Phase II ESI remain in native materials. This approach:

- Completes physical removal of known hazardous materials;
- Addresses uncertainty identified by A&M Environmental Services regarding subsurface conditions;
- Reduces risk to future redevelopment partners; and
- Aligns with DTSC/EPA expectations for defensible site closure.

Alternative #2 (No Action) is not recommended, as it fails to address site risks or support redevelopment. Alternative #3 alone is not recommended because investigation without debris removal would not achieve cleanup objectives.

Green and Sustainable Remediation Measures for Selected Alternatives

To make the selected alternative greener, or more sustainable, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort. The City of Marysville will require the cleanup contractor to follow an idle-reduction policy and use heavy equipment with advanced emissions controls operated on ultra-low sulfur diesel. The excavation work would be conducted during the dry-weather months in order to minimize groundwater infiltration into the excavation area. In turn reducing dewatering needs and the amount of dewatering liquids requiring disposal/treatment. The number of mobilizations to the Site would be minimized and erosion control measures would be used to minimize runoff into environmentally sensitive areas. In addition, the City of Marysville plans to ask bidding to clean up contractors to propose additional green remediation techniques in their response to the Request for Proposal for the cleanup contract.

IV. Community Review and Administrative Record

In accordance with EPA Brownfields Cleanup Grant programmatic requirements, this ABCA will be made available for public review and comment prior to finalization and implementation of EPA-funded cleanup activities.

The draft ABCA will be posted on the City of Marysville website and made available for review at City Hall and the local public library. A public comment period of not less than 30 days will be provided. Notice of availability will be issued through the City's standard public notification channels.

All comments received will be reviewed and considered by the City, and a responsiveness summary will be prepared documenting how comments were addressed in the final ABCA. The final ABCA, along with supporting documents, public comments, and the responsiveness summary, will be maintained as part of the Site's administrative record and made available to the public.