NARRATIVE INFORMATION SHEET

1. Applicant Identification:
   David Halloran
   GESD Superintendent
   Gloversville Enlarged School District (GESD)
   234 Lincoln Street
   Gloversville, NY 12078

2. Funding Requested:
   a. Single Site Cleanup
   b. Federal Funds Requested
      i. $500,000
      ii. GESD is not requesting a waiver of the 20% cost share requirement.
      iii. GESD is not requesting a waiver of the $500,000 limit

3. Location
   a. City: Gloversville
   b. County: Fulton County
   c. State: New York

4. Target Area and Priority Site/Property Information
   Kingsborough Elementary School
   24 W. 11th Avenue
   Gloversville, NY 12078
   Census Tract Number: 36035971100

5. Contacts:
   a. Project Director:
      David Halloran
      GESD Superintendent
      Gloversville Enlarged School District (GESD)
      234 Lincoln Street
      Gloversville, NY 12078

   b. Chief Executive/Highest Ranking Official
      David Halloran
      GESD Superintendent
      Gloversville Enlarged School District (GESD)
      234 Lincoln Street
      Gloversville, NY 12078
6. Population = 2,760 (Target Area)

7. Other Factors

<table>
<thead>
<tr>
<th>Other Factors Checklist</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community Population is 10,000 or less</td>
<td>1</td>
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<tr>
<td>The applicant is, or will assist a federally recognized Indian tribe or United States territory</td>
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<td>The proposed site is impacted by mine-scarred land</td>
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<td>Secured firm leveraging commitment ties directly to the project and will facilitate completion of the projects/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
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<td>The proposed site is adjacent to a body of water (i.e. the border of the priority site(s) is contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td>2</td>
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<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>2</td>
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<tr>
<td>The reuse of the proposed cleanup site will facilitate renewable energy from wind, solar or geothermal energy.</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
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<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
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</tbody>
</table>

8. Letter from State (Separate Attachment from the NYS Dept. of Environmental Conservation)

9. Releasing Copies of Applications: N/A This information is not confidential, privileged, or sensitive and may be made public.
November 19, 2021

David Halloran, Superintendent
Gloversville Enlarged School District (GESD)
234 Lincoln Street
Gloversville, NY 12078

Dear Superintendent Halloran:

This is to acknowledge that the New York State Department of Environmental Conservation (DEC) received a request from HRP Associates on behalf of the Gloversville Enlarged School District (GESD), dated November 2, 2021, for a state acknowledgement letter for a Federal Year 2022 United States Environmental Protection Agency (USEPA) Brownfields grant.

I understand that GESD plans to submit a Brownfield Cleanup grant application for $500,000. Focus of the funding will to complete the cleanup of tannery wastes, including VOCs and metals, at the Kingsborough Elementary School, which is a priority site for the school district. The site is located at 24 W. 11th Avenue, Gloversville, NY 12078. Funding will also be allocated for remediation and reuse planning and community involvement activities.

DEC encourages initiatives to redevelop brownfields with the goal of mitigating any environmental and health impacts that they might pose.

Sincerely,

Karen Diligent
Director, Bureau of Program Management

ec: T. Wesley, USEPA Region 2
A. Devine, USEPA Region 2
G. Burke, DEC Albany
C. O’Neill, DEC Region 4
C. Meher, GESD
D. Graham, GESD
D. Lisa, HRP Associates
1.0 PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i Background and Description of Target Area

The Gloversville Enlarged School District (GESD), located in central NY is seeking a $500,000 Brownfield Cleanup Grant to mitigate tannery waste containing hazardous substances discovered at the Kingsborough Elementary School. GESD is a school district that serves 2,760 students and covers an area of 82 square miles including the entire City of Gloversville and portions of surrounding towns. The cleanup grant funds would be a great assistance to eliminate environmental hazards for the children of this impoverished school district that is financially stressed.

Gloversville, NY, a small, rural City within Fulton County situated in the foothills of the Adirondack Mountains along the Cayadutta Creek, was the birthplace of glove making and tanning in the United States. For over 150 years the industry was the main economic driver for the community with over 200 tanneries littered through the town, adjacent to schools and surrounded by neighborhoods. Gloversville once supplied 90% of all gloves sold in the United States. Production peaked in the 1950s with tanneries and glove shops employing 80% of Gloversville residents. Economic and policy changes in the 1940s signaled a decline of the industry. By the 1980s, outsourcing forced 86 tanneries to close and eliminated hundreds of jobs. The industry struggled to adjust to regulatory pressure, after decades of dumping toxic tanning agents into local landfills, onto the ground and into the excessively polluted Cayadutta Creek. The Creek changed colors day to day based on the dyes dumped into the water. Suds 10 feet high would float on top of the water. For decades, the creek was devoid of any life. Leathermakers paid millions for a sewage treatment plant in 1971 and millions more to upgrade the plant in the 1980s. Competitive and regulatory pressure continued to mount on the tanning industry. By the mid-1990s, only a few manufacturers remained. The overseas migration and collapse of the glove industry left Gloversville financially depressed, littered with brownfields, high unemployment, extreme poverty rates, health issues, and a higher-than-expected number of cancers per capita.

Due to historical industrial development along the creek, numerous contaminated sites are located within a federally designated floodplain. The tanneries now sit decaying with broken windows, collapsed roofs, exposed asbestos-containing material, and graffiti, inviting vagrants. Many of the tanneries have totally collapsed leaving behind piles of asbestos containing rubble, and according to the City Fire Marshall, two tanneries have been set on fire by an arsonist within the past year. The declining trend has been set, and the sites will only deteriorate and pose a greater threat to nearby residents. Since many of the tanneries closed prior to the advent of environmental regulations, and the City has not experienced any economic growth in decades, not only are the sites decaying, but they have not been investigated nor are they secured to prevent children from entering.

Due to the closure of the tanneries, the City suffered a massive decline of its industrial base resulting in a 44% loss of its population since its peak of 23,634 in 1950, leaving behind numerous former tanneries that expose impoverished and sensitive populations to severe environmental consequences. In fact, the NYS Department of Environmental Conservation (NYSDEC) mapped most of the City as potential environmental justice areas due to extreme poverty (25.7% vs 13% NYS) with half the City’s census tracts exceeding 40% poverty. Further, the EPA EJSCREEN noted that the target area is within the 94 percentiles for lead paint, 88 percentiles for Superfund Proximity, and numerous other indicators (Wastewater Discharge, PM2.5, Ozone, NATA Cancer Risk, NATA Respiratory, Superfund and RMP proximity) exceed the 50% percentile for the state and region.

The Kingsborough School, the Target Area, is located within census tract 36035971100 which is occupied by an impoverished population of 2,760 people (26% families vs. 13% NYS, US Census 2019) with a mean family income 1/2 of NYS ($38,896 vs $68,486 US Census 2019). The area is characterized by modest homes (mean value $80,800 vs $283,700 NYS, US Census 2019) constructed on small lots beginning in the early 1900s that surround vacant tanneries (including a vacant dilapidated fire damaged former tannery across the street) and vacant homes (20% vs 11% for NYS). The EPA grant will be used to remediate tannery waste detected within the Kingsborough school yard that potentially expose children to cancerous by-products and wastes.
1.a. ii. Description of the Priority Brownfield Site(s)
The Kingsborough Elementary School, located on a 7.5-acre parcel within a federally designated flood plain at 24 W. Eleventh Avenue in the City of Gloversville (serves 260 students in pre-kindergarten through grade 2), is targeted for cleanup. The GESD purchased the land in 1970 for the construction of the Kingsborough School. The eastern half of the site was developed as the school building and parking area while the western portion of the site consisted of a softball field, playground, and undeveloped area. Reportedly prior to development as a school the site was a vacant field. Currently, the school is surrounded by modest early 1900s housing on less than ¼ acre lots except for the area across the street to the north which is occupied by the former Traditional Leather (in bankruptcy) site. The Traditional Leather site contains an abandoned former tannery with numerous piles of asbestos containing building materials due to the collapse of the on-site building. Environmental investigation has determined that Traditional Leather exhibits tannery waste, petroleum, VOCs, SVOCs and metals within the sites soils and groundwater.

In 1988 the GESD initiated a construction project to the west of the school building and discovered tannery waste, which was reported to the NYSDEC. Following the tannery waste discovery, GESD retained EDER Associates Consulting Engineers, P.C. (EDER) to complete a Phase II site investigation. In summary, EDER determined that tannery waste was historically deposited on the Site, but disposal history is not documented, however it is suspected that tannery waste from the adjacent Tradition Leather were deposited at the school. The EDER report states that, “remedial actions such as excavating a large volume of soil from the playing field and/or groundwater remediation do not appear warranted except as a risk aversion measure.” In response to this finding, the area was covered with soil.

In 1998, ground settling, and a sulfur odor was noted in the playground to the west of the school building. In response to this concern, GESD closed the school to students and retained Ambient Environmental (Ambient) to investigate the areas. Ambient installed 17 test pits at depths ranging from 4 to 9 ft below grade. Based on a review of the collected information, it was determined that the ten out of seventeen test pits encountered 0.5 feet of topsoil followed by approximately 2 to 4 feet of tannery fill material. The tannery fill material was observed to be black/gray ash-like fill material with degraded leather fibers, straps of leather and/or ‘hide,’ clay-like caustic material, and wood pieces. Once the underlying soils were exposed, strong petroleum and sulfur odors were noted. Sampling of the material indicated that VOCs (toluene, ethylbenzene, acetone, and isopropyl benzene), SVOCs (benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo (a, h) anthracene, and indeno(1,2,3-cd) pyrene) and chromium were present on the school property at levels above applicable NYSDEC standards. Further it was noted that material was of poor structural quality and would not be suitable for construction projects from a geotechnical perspective; paving the area may result in vapor build-up under the pavement.

In the interim, a soil cover was placed over the area to reduce exposure from odors and tannery waste near the surface, as well as stabilize “soft” areas. The site was also fenced off to access to the area by children and community members.

1.b. Revitalization of the Target Area
1.b.i. Reuse Strategy and Alignment with Revitalization Plans
Since the construction of Kingsborough Elementary School in 1972, its surrounding population and use have changed. Originally developed as a neighborhood school to which children walked, it changed to a school where parents wish to drop their children off. The school board and Facility Committee met numerous times to discuss options (modify existing school or abandon school and build a new one) to address the current educational needs and the presence of tannery waste on the school property. Following several public meetings to obtain public input, it was decided the best option was to upgrade the existing school, since it was the cultural center of a neighborhood; abandoning the school would continue to contribute to the neighborhood decline and building a new school was cost prohibitive. Following the public input, a school upgrade was designed that included the construction of a bus loop, parking and parent drop off area over the existing field (west of school) to improve safety during arrivals and
departures by reducing congestion on the street and moving student outdoor recreational activities to the east side of the school.

Once the construction projects conceptual designs and cost estimates were finalized, the GESD held a vote in December 2020 to approve or deny the project. By a majority of 75.5% to 24.5% GESD voters approved the project. The proposed cleanup aligns well with the community’s vision to prevent further decline of neighborhoods, invest in keeping and upgrading the school, (improving traffic patterns and moving student outdoor recreational areas to the east of the school), to meet changing community needs.

1.b.ii. Outcomes and Benefits of Reuse Strategy
The remediation of the tannery waste will eliminate a potential exposure pathway for children as well as allow development of school property for the children’s’ outdoor recreation and improved safety. The cleanup will result in the removal of legacy pollution and development of an environmentally safe place for all members of the community to gather. Further investment in the Kingsborough School will prevent further decay within an already blighted area (located adjacent to a former tannery that consist of piles of rubble) and demonstrate to the area residents that the community is willing to invest in their neighborhood to improve their quality of life.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse
Due to environmental hazards associated with tannery’s waste materials environmental hazards, poor geotechnical quality, potential hydrogen sulfide off-gassing and the presence of school children, the community made the decision that the waste materials need to be removed. Current estimates determined it will cost $3M (est.) to remove soil contaminated with leather tannery waste from the playing fields at Kingsborough Elementary School, making it the largest single expense for the school system. The NYS Department of Education will provide funding for the school construction project but not for the contaminated soil removal. Further, although NYS provides cleanup grants, NYS requires that the cleanup be associated with projects that attract or expand businesses to create new jobs or retain jobs. Since NYS does not currently have funding to remediate the soil, the cost of the contaminated soil removal and backfill falls entirely on the citizens of the GESD. Therefore, any additional funding will help alleviate and reduce the tax burden on an already overburden impoverished population.

1.c.ii. Use of Existing Infrastructure
The remediation of the site will allow the reuse of an existing school building, rather than constructing a new school. All existing infrastructure, water, sewer, electricity, roads, and sidewalks are adequate to meet the school’s needs. Adding a dedicated drop off area will reduce traffic congestion and increase public safety in the neighborhood. A City redevelopment strategy review in 2018, determined the City’s infrastructure as follows:
- Water System - no capacity issues or immediate needs. However, due to age of existing water storage tank, the City is replacing it at a cost of $5M ($3M from NYS Environmental Facilities Corporation grant).
- Wastewater - treatment plant has adequate capacity and remains in good condition

Where necessary, funding is available via state grants and Fulton County IDA (local agency with ability to provide financial assistance via bonding) to upgrade existing infrastructure. Existing infrastructure at priority sites is available and adequate to support the proposed revitalization.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
2.a. Community Need
2.a.i. The Community’s Need for Funding
According to the Gloversville School District’s Financial Transparency Report, the district is considered a high need school district. The district’s ability to raise funding is significantly less than the average school district in NYS and student needs are significantly more than the state average, in part due to the small population of the district. The
report also indicates that 69% of the students are economically disadvantaged and 18% of the students have disabilities (learning and physical). For the 20-21 school budget the district was required to reduce spending by $2 million in reaction to the passage of the state budget signed by Gov. Andrew Cuomo on April 3 that keeps state aid to school districts flat at the 2019-20 level while allowing the state to adjust or reduce aid over the course of the year based on actual revenues received by the state. In general, Gloversville has limited discretionary funding; it has experienced financial difficulties stemming from long term population loss (down 34% from its peak in 1950) and inability to raise property taxes as it has nearly exhausted its constitutional taxing limit (NYS constitutionally restricts property tax increases of more than 2%). The constitutional limit is only exacerbated by Gloversville’s mean home values ($80,800 vs $125,000 for Fulton County and $283,700 NYS – 2019 est.); substantial number of tax foreclosure sites; poor population (27.7% live in poverty compared 14.1% for NYS and 12.3% nationally) of 14,878; and flat retail tax revenue due to loss of retail. The inability to raise revenue severely limits the City’s flexibility to address unforeseen expenses and to make ongoing infrastructure investments. Without outside financial support, GESD has limited funding to clean up the school yard since it has a limited ability to raise additional funds.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Population

EPA’s EJSCREEN tool indicated that sensitive populations include:
- Low income in the 84th percentile of NYS/Region 2/USA
- Less than high school education is in the 69th percentile of NYS/Region 2/USA
- Population less then age 5 is in the 77th percentile for NYS/Region 2/USA

The noted sensitive populations are exposed to:
- Lead paint is in the 95th percentile for NYS/Region 2/USA
- Superfund proximity is in the 88th percentile for NYS/Region 2/USA

Children under five years of age are exposed to various sources of lead due the City’s early 1900’s housing stock and numerous brownfields. Testing has indicated that the children exhibit high blood lead levels (Gloversville 47.8/1000 vs 20.6/1000 Fulton County as reported by NYSDOH). According to the U.S. CDC, lead interferes with the development of the body’s organs, especially in young children, where it impedes learning. In addition, due to the numerous tanneries, residents are exposed to soils and groundwater containing elevated concentrations of VOCs, metals, and PAHs. NYSDOH health statistics indicate that the area exhibits higher than average rates of cancer, and infant mortality, which may be due to the presence of the noted contaminants. The brownfield grant will result in the identification and mitigation of hazardous substances in the soil and groundwater. It will remove the environmental barrier to site development and improve living conditions for sensitive populations.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Based on a review of NYS Department of Health information, Fulton County citizens (no Gloversville-specific information was available) suffer greater rates of the following Chronic Disease when compared to NYS:
- Lung Cancer incidence rate - 67.70/100,000 vs 57/100,000 for NYS
- Heart Disease - 259.9/100,000 vs 214.9/100,000 for NYS
- Stroke Incidence rate - 39.2/100,000 vs 34.8/100,000 NYS
- Post Neonatal Deaths - 3.8/100,000 vs 1.5/100,000 NYS
- Incidence rate of elevated blood lead levels (10+ug/dl) in children < 6 yrs. - 12.2/1,000 vs 6.0/1,000 NYS
- Asthma hospital discharge rates - 19.9/10,000 residents Fulton County vs. 15.8/10,000 NYS

Lung cancer and Post Neonatal Deaths can be partially attributed to the area’s residents’ chronic exposure to PAHs and VOCs present at Brownfields. The elevated blood lead levels of children due to children living in housing that was built in the early 19th century and the presence of lead within the TAs soils. Metals such as lead, cadmium,
and arsenic can contribute to heart disease. It is not clear what causes asthma; however, there is evidence that exposure to chemicals including VOCs can cause or exacerbate this condition.

(3) Promoting Environmental Justice
EJScreen listed the following populations that disproportionately share the negative consensuses from industrial, governmental and/or commercial operation or policies: low income; less than high school education; and children less than the age of 5. To ensure that these individuals have an appropriate opportunity to participate and can influence rulemaking decisions that impact them, GESD will ensure that groups and group’s representing their issues and concerns are included on all information distribution, meetings, and events. Throughout the process GESD will encourage the site cleanup to advance Environmental Justice objectives including increasing surrounding property values, improving soil issues, eliminating disinvestment, and increasing access to open space and recreational opportunities to ensure the populations benefit from cleanup activities that shape their neighborhoods. As needed, GESD will recommend program, policy and ordinance revisions to address concerns and ensure proposed revitalization is responsive to underserved populations and vulnerable groups. This grant will assist in obtaining community input regarding site remediation and reuse planning. Completing these items will assist in cleaning up contaminated sites that will provide a safe recreational space, improve transportation and eliminate of exposure to hazardous chemicals.

2.b. Community Engagement
2.b.i. Project Involvement and 2.b.ii Project Roles
The GESD will develop a written Community Involvement Plan to document and formalize the process to share information and seek public input to decision-making. Input will be sought on clean-up design and implementation. The public will be given ample opportunity to submit comments through community meeting participation via the GESD Board of Education monthly meetings that are advertised and open to the public to discuss issues impacting schools. In addition, members of the school staff attend the meeting. Partners that will assist in obtaining and providing community input are provided below.

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Specific Role in the project</th>
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<tbody>
<tr>
<td>GESD Parent Teacher Association</td>
<td>President - Jeremy Krajewski</td>
<td>Provide input from parents with regards to impacts to children</td>
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<tr>
<td>Gloversville Board of Education</td>
<td>Robert Curtis - President</td>
<td>Provide monthly project updates to public, obtain and respond to public comments</td>
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<td></td>
<td>518-775-5791</td>
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<tr>
<td>Kingsborough Principal</td>
<td>Bernadette Callender</td>
<td>Serve as communication conduit between project and Gloversville Board of Education and provide insight on input of project on school operations</td>
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<td></td>
<td>24 W. Eleventh Ave</td>
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<td></td>
<td>Gloversville, NY 12078</td>
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<td></td>
<td>518-775-5730</td>
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<tr>
<td>Gloversville Housing and Neighborhood Improvement</td>
<td>Gregory Young - Exe Director</td>
<td>Assist with public outreach to adjacent neighborhood</td>
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<tr>
<td>Corporation</td>
<td>518 -620-6276</td>
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<tr>
<td>Hamilton-Fulton-Montgomery BOCES (HFM BOCES)</td>
<td>Craig Clark - HFM Communications Specialist Phone: (518) 736-4315</td>
<td>Assist with public outreach, create strategic communication plans, if required</td>
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2.b.iii Incorporating Community Input
GESD will utilize three primary efforts to communicate project progress to the community: 1) GESD will announce the award in a press release to the local newspaper and in ads placed on local radio stations and the local Public Access Television station to community members. The announcement will also be posted on GESD websites and social media (Facebook and Twitter) pages. Community partners listed in (Section 2.b.i) will be given information
to distribute and place on their websites. 2) The GESD will host an initial outreach and “kick-off” meeting to acquaint the community with the cleanup activities at a school board meeting. The kick-off meeting will be posted in local newspapers and the GESD website. Meeting outcome, community input and comments and responses will be posted on the GESD’s websites and community partner’s websites. 3) GESD will continue communication with stakeholders. The GESD will conduct quarterly public meetings and presentations to provide project progress updates and obtain input and comments from the community. Following the presentation, the meeting will be opened for public comments which may be submitted in writing prior to the meeting or orally presented at the meeting. The GESD will respond to the comments at the meeting or provide written responses following the meeting. At the close of the project, the GESD will hold a public meeting to share project outcomes. Presentation materials and minutes will be archived and placed on the GESD’s websites and social media pages. Social media and other innovative methods will be used to reach out to and gather input from the public. If requested, news releases, web postings, written materials, etc. will be available in other languages for residents whose first language is not English. If community participation meetings are not possible due to COVID-19 the following will be completed at the frequencies noted above:

- **Appropriate COVID-19 procedures** will be implemented (i.e., masks, social distancing, etc.).
- **Video stream meetings, and link agendas and documents** - To create an effective online meeting, video segments will be timestamped and linked to agendas, minutes, and supporting documentation; and
- **Optimize for accessibility** - Meeting web pages and content will be checked to ensure documents are screen-reader friendly for accessibility, and closed captioning will be used when streaming video. Public meeting online participation tools, including conference calls for those without digital access, will be used to solicit public comment at each event. Comments submitted during meetings will be responded to immediately. Written or online comments will be responded to individuality and presented at the next meeting.

### 3.0 TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

#### 3.a Proposed Clean-Up Plan

Sampling has indicated that hazardous materials, in the form of tannery waste, were disposed in an approximately 5,600 square yard area directly west of the Kingsborough Elementary School building (area of existing playground, softball field and recreational area). The tannery waste is present in a four-foot-thick layer above the natural clay soils at the Site. Hazardous compounds identified in this material include VOCs (ethylbenzene, isopropyl benzene, toluene and acetone), SVOCs (benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(a, h) anthracene, and indeno(1,2,3-cd) pyrene) and metals (chromium and lead) which were all detected at concentrations exceeding NYSDEC soil clean-up objectives. Although the area was capped and secured by a fence in 2019, the existence of the tannery waste material near the school poses a health threat to the students and limits the ability of the GESD to utilize the west yard area for any productive purpose.

The following alternatives were evaluated in the Alternative Brownfield Cleanup Analysis (ABCA); No Action, Cover Placement, and Removal and Off-Site Disposal of Waste Material, Backfill. Based on an evaluation of effectiveness, implementibility, and cost, the selected remedy is Off-Site Disposal of Waste Material, Backfill. In general, the current cover would be removed and stockpiled on-site for use as back-fill, and the underlying waste material would be excavated and transported to an appropriate facility for off-site disposal. The excavation would be backfilled with ‘engineered’ clean fill to allow for future use as parking, bus access, playground, ball fields, etc.; this alternative would remove the assumed source of VOCs to groundwater and would remove any real or perceived threat to students, staff, visitors, and residents. Costs to remediate the area are $2M which exceed the grant amount. Therefore, the grant funding would be used to prepare remediation contractor bid specifications, project documents including Stormwater Pollution, Prevention Plan, Community Air Monitoring Program, Odor Control Plan, Remedial Action Work Plan, Health and Safety Plan, Selection of Remedial contractor, Oversight of Remedial Contract, and a remediation report as well as project oversight. The school will utilize the school budget to fund the remainder of the project.
Contractors utilized for cleanup will comply with Davis Bacon wage compliance and be required to document wages with interviews and financial reporting/back-up.

### 3.b. Description of Tasks/Activities and Outputs (i. – iv)

<table>
<thead>
<tr>
<th>Task 1 - Cooperative Agreement Oversight</th>
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<tbody>
<tr>
<td>i. Project Implementation</td>
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<tr>
<td>Discussion of EPA-funded activities: GESD will serve as the main conduit for disseminating information, encouraging public participation, and retaining a QEP (Qualified Environmental Professional) to develop bid documents and oversee the project, assist the GESD with solicitations in selecting a qualified contractor to complete the remedial excavation project. GESD will submit quarterly reports and final reports. A GESD member will also travel to up to two brownfields conferences during the project timeframe. Non-EPA grant resources needed to conduct task/activity: None</td>
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<td>ii. Anticipated Project Schedule: Month 1 to Month 36 reporting quarterly; selection month #; etc.</td>
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<td>iii. Task/Activity Lead: GESD</td>
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<td>iv. Outputs: 12 quarterly reports, 12 quarterly financial status reports, participation in two brownfield conference events, Selection of QEP</td>
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<th>Task 2: Project Management</th>
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<tr>
<td>i. Discussion of EPA-funded activities: QEP will prepare project documents including bid specifications and project plans including Stormwater Pollution, Prevention Plan (SWPPP), a Community Air Monitoring Program (CAMP), Odor Control Plan, Health and Safety Plan and a Remedial Action Work Plan (RAWP). QEP will assist GESD in selection of remedial contractor. Once contractor is selected and project plans developed the project plans will be submitted to the GESD, NYSDEC and EPA for approval. Once all plans have been reviewed and approved by the appropriate regulatory agencies, the remedial excavation will start. QEP will oversee field activities. Once remedial activities are completed QEP will prepare a remediation report. In addition, QEP will prepare ACRES and assist GESD with preparation of reports.</td>
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<tr>
<td>ii. Anticipated Project Schedule: Month 1 to Month 36 reporting quarterly; selection month #; etc.</td>
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<tr>
<td>iii. Task/Activity Lead: GESD</td>
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<thead>
<tr>
<th>Task 3: Community Involvement</th>
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<tbody>
<tr>
<td>i. Project Implementation</td>
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<td>Discussion of EPA-funded activities: GESD and the QEP will lead public involvement efforts, assisted by remediation contractors as needed. Quarterly public meetings will be held, with information provided in easy-to-understand fact sheets and project summaries that can then be distributed among local community groups that may be interested in project progress. Social media outlets (Internet, Facebook™, Twitter™, Instagram™) and the “Local News Section” of the local newspaper will be utilized to provide a wide assortment of local community coverage. If a community participation meeting is not possible due to COVID-19, the following will be completed:</td>
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<tr>
<td>• Video stream meetings, and link agendas and documents. To create an effective online meeting, video segments will be timestamped and linked to agendas, minutes, and supporting documentation; and</td>
</tr>
<tr>
<td>• Optimize for accessibility - meeting web pages and content will be checked to ensure documents are screen-reader friendly for accessibility and closed captioning will be used when streaming videos. Public meeting online participation tools will be used to obtain public comment. Comments will be responded to during the meeting, and meeting or project revisions will be forwarded to the Steering Committee for consideration.</td>
</tr>
<tr>
<td>Non-EPA grant resources needed to conduct task/activity: Community Partners will help advertise public meetings and disseminate the project brochure.</td>
</tr>
</tbody>
</table>
Narrative: Gloversville EPA Cleanup Grant – Kingsborough Elementary School

| ii. Anticipated Project Schedule: Month 1 through Month 36; quarterly GESD meetings |
| iii. Task/Activity Lead: GESD |
| iv. Outputs: 12 GESD quarterly meetings, 1 project brochure, 2 articles for media updates |

Task 4: Remediation Activities

i. Project Implementation: Discussion of EPA-funded activities: Selected remediation Contractor will complete following tasks:
   1) Soil cover material (estimated 3,700 cubic yards) will be removed and stockpiled for future use as backfill.
   2) All tannery waste (estimated 3,000 cubic yards) will be removed using an excavator and loaded onto tri-axle dump trucks, for transport to an approved, permitted off-site disposal facility.
   3) Rainwater that collects in the excavation will be visually inspected and screened with a PID, if no evidence of contamination is visible, water will be pumped to the ground surface and allowed to infiltrate. If evidence of contamination is observed, the water will be containerized and characterization for off-site disposal.
   4) Following the removal of the waste material the excavation will be backfilled.
   5) A final report will be prepared summarizing the remedial activities, EPA and NYSDEC filings, project monitoring, contractor licenses and permits, waste manifests, and landfill receipts for the waste and Davis Bacon reporting.

Non-EPA grant resources needed to conduct task/activity: Community Partners will advertise/conduct public meetings and disseminate project brochures.

| ii. Anticipated Project Schedule: Month 8 through Month 16 |
| iii. Task/Activity Lead: GESD |
| iv. Outputs: Contaminated Soil Excavation, backfill and Remediation Report |

Budget Details:

Task 1 – Cooperative Agreement Oversight
   Personnel Costs: Travel: $4,000 (one committee person attending 2 brownfield conferences $2,000/event)  
   QEP RFP and Selection – 20 at $50/hr. = $1,000  
   Reporting – 100 hrs. at $50/hr. = $5,000  
   Contract Oversight – 100 hrs. at $50/hr. = $5,000

Task 2 – Project Management
   Remediation Contractor Bid document (QEP) - $5,000  
   Plan preparation (QEP)- $15,000  
   Remediation oversight/odor/CAMP (QEP)- $30,000  
   Closure Report (QEP)- $15,000

Task 3 – Community Involvement
   Personnel Costs: Supplies = $500 (copy paper/folders/printing costs for public handouts)  
   Contract QEP Project Manager, 4 hrs./quarterly meeting, 12 quarterly meetings; $100/hr. = $4,800

Task 4 – Remediation Activities
   Contaminated soil removal and backfill - $504,700  
   Contracted QEP – Oversight/MGT, including Davis Bacon Reporting = $15,000 Cost Share: The GESD will contribute 20% cost share of $100,000.

3.d. Measuring Environmental Results
GESD will include an agenda item once per quarter at GESD Board of Education (BOE) meetings, which are open to the public, to review project progress and take corrective actions, when necessary, address any community concerns, guide the project and ensure EPA brownfield funds are expended in an efficient and timely manner. Should there be schedule delays or budget issues, these will be discussed with the EPA Project Officer. The GESD will coordinate activities with the NYSDEC and EPA. Required Quarterly Reports will be submitted in a timely manner to the EPA, detailing outputs, and outcomes of the project, and updating site information into the ACRES database. Outputs to be tracked will include the number of GESD BOE meetings, The actual outputs will be
compared to the estimated number of outputs listed in Section 3.b. Gloversville will document outcomes/outputs that cannot be easily entered into ACRES (i.e., website updates, staff training, and community outreach/meetings) in quarterly reports. Gloversville will evaluate the project progress semi-annually, and, if goals are not being met, will meet with EPA Project Officer, local stakeholders and the QEP(s) to discuss the shortcomings and adjust the project approach.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

4.a. i and 4 a.ii Organizational Capacity and Description of Key Staff

GESD is a school district within New York State that is operated by an elected 9-member BOE. The BOE hires the Superintendent to run the day-to-day operation of the school district and enforce policies and procedures enacted by the BOE. The BOE conducts public board meetings once per month to address issues, pass resolutions and retain services. The BOE also hires heads of departments to run various GEDC Departments including Treasurer, Facilities, etc.

The GESD has the internal capacity to manage the grant. The primary and final decision maker for the grant will be Mr. David Halloran, GESD Superintendent. Mr. Halloran has over seven years of experience as Superintendent. He graduated from the State University of New York at Albany with a bachelor’s degree in history and holds a master’s degree in education from Concordia University in Portland, Oregon, and earned his School District Administrator certification from Massachusetts College of Liberal Arts. Mr. Holleran has been extensively involved in the Kingsborough School cleanup project. The Superintendent will oversee the project and financial matters with the assistance of:

- Ms. Cathy Meher, Treasurer at Gloversville School District, who will serve as interim manager for the grant in the event of the Superintendent’s departure from that position and until such time as the new Superintendent is appointed. Ms. Meher has over 15 years of experience in managing school projects. Ms. Meher has experience overseeing all aspects of GESD finances and projects.
- Mr. Christopher Wojeski, Assistant Superintendent of Schools – will assist with on-site coordination and ensuring student safety
- Mr. Osama Mustafa, Director of Public Relations & Communications – will assist with advertising and conducting public meeting, recording events and responding to comments.

GESD does not have the internal capability to perform several aspects of the cooperative agreement including reporting and environmental clean-up. Therefore, Gloversville intends to select qualified individuals and firms such as a QEP, through a competitive process to assist with reporting and completion of environmental clean-up. The Superintendent, in coordination with the GESD BOE will collaborate with the selected consultant on an on-going basis, approve requests for payments and oversee the general direction of the grant. Additional expertise and resources, such as contractors will be contracted through the appropriate RFP processes. All such processes will strictly adhere to the EPA’s solicitation clauses. Municipal services, such as the City’s town lawyer and Commissioner of Finance can be made available, as necessary. Gloversville also benefits from the extensive and enthusiastic support of the community.

4.a.iii. Acquiring Additional Resources

Additional expertise and resources, such as contractors will be obtained through a competitive qualifications-based procurement process in compliance with the EPA’s “Professional Service” procurement process (2 CFR 200.317-326).

4.b Past Performance and Accomplishments

4.b. ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements
(1) **Purpose and Accomplishments:** GESD has not received an EPA Brownfield Grant but has received other Federal/Non-Federal Assistance agreements. Previous grants have been successfully completed, on time, on budget, and in compliance with all regulations.

### CLIENT GRANTS

<table>
<thead>
<tr>
<th>Granting Agency</th>
<th>Awarded Grant $</th>
<th>Status</th>
<th>Purpose</th>
<th>Outputs</th>
<th>Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>NYS Education Department</td>
<td>$499,334</td>
<td>Rec’d annually</td>
<td>To provide services to preschool children to prepare them for kindergarten.</td>
<td>Children are better prepared to enter kindergarten. Teachers provide early interventions and can evaluate student needs and address them.</td>
<td>The district sees an increase in overall preparedness for kindergarten.</td>
</tr>
<tr>
<td>NYS Education Department</td>
<td>$1,640,181</td>
<td>Rec’d annually</td>
<td>To provide academic intervention services (AIS) to at risk students.</td>
<td>The funds are used for tutoring at risk students and providing AIS supports as needed. Additional reading and math support is also provided.</td>
<td>The district’s graduation rate has steadily increased because of the services provided by this grant funding.</td>
</tr>
<tr>
<td>NYS Education Department</td>
<td>$733,450</td>
<td>Rec’d annually</td>
<td>To provide services for student with disabilities (SWD).</td>
<td>This grant provides funding for teaching and non-instructional staff to provide additional supports to our SWD population.</td>
<td>The district has seen an increase in the graduation rate for SWD.</td>
</tr>
</tbody>
</table>

(2) **Compliance with Grant Requirements:** GESD will generate a work plan with tasks, milestones, and timeframes for completing the work within grant guidelines. During the administration of the grants, meetings will be held at milestones by GESD officials and interested/invested parties to determine progress and make needed changes. At the conclusion of the grants, a review was completed to determine the overall success and/or areas for improvement. These reports were submitted to the awarding agency per grant requirements. Reporting requirements within each grant (monthly or quarterly), were completed on time and submitted in the required report formats. No corrective actions were required during the administration of the grants.
Threshold Criteria Response
Threshold Criteria Response - Cleanup Grant

1. **Statement of applicant eligibility as a School District:**

Gloversville Enlarged School District (GESD) is eligible to apply for a Grant as a general-purpose unit of local government. Proof of this is provided.

2. **Previously Awarded Cleanup Grants:** the site has not received funding from a previously awarded EPA Brownfields Cleanup Grant

3. **Expenditure of Existing Multipurpose Grant funds:** Does not apply

4. **Site Ownership:** See attached from GESD

5. **Basic Site Information:**
   - Kingsborough Elementary School
   - 24 W. 11th Avenue
   - Gloversville, NY 12078
   - Owner of Site: Gloversville Enlarged School District

6. **Status and History of Contamination at the Site:**
   a. Site is contaminated by hazardous substances
   b. The operational history and current uses of the site: Elementary School
   c. Environmental concerns if known at the site: exposure to hazardous substances and odor associated with Tannery Waste
   d. How the site became contaminated, and to the extent possible, describe the nature and extent of contamination:

Prior to the 1970’s an adjacent, now bankrupt tannery disposed of waste at the site. Sampling has indicated that hazardous materials, in the form of tannery waste, were disposed in an approximately 5,600 square yard area directly west of the Kingsborough Elementary School building (area of existing playground, softball field and recreational area). The tannery waste is present in a four-foot-thick layer above the natural clay soils at the Site. Hazardous compounds identified in this material include VOCs (ethylbenzene, isopropyl benzene, toluene and acetone), SVOCs (benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo (a, h) anthracene, and indeno(1,2,3-cd) pyrene) and metals (chromium and lead) which were all detected at concentrations exceeding NYSDEC soil clean-up objectives. Although the area was capped and secured by a fence
in 2019, the existence of the tannery waste material near the school poses a health threat to the students and limits the ability of the GESD to utilize the west yard area for any productive purpose.

7. **Brownfields Site Definition:** To be eligible for Brownfields Grant Funding, sites must meet the definition of a brownfield under CERCLA 101 (39) as described in the Information on Eligibility for Brownfields Funding under CERCLA 104(k)

   a. Site is not listed or proposed for listing on the National Priorities List – N/A
   b. Or judicial consent decrees issued to or entered into by parties under CERCLA – N/A
   c. Not subject to jurisdiction, custody, or control of the US government- N/A

8. **Environmental Assessment Required for Cleanup Grant Applications:**
   a. Describe the type of environmental assessment conducted: Phase II ESAs
   And provide the date it was conducted in: 1988 and 2019

9. **Enforcement or Other Actions:** N/A

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

10. **Sites Requiring a Property Specific Determination:** N/A

11. **Threshold Criteria Related to CERCLA/Petroleum Liability**
   a. Property Ownership Eligibility – Hazardous Substance Sites
      i. **EXEMPTIONS TO CERCLA LIABILITY**
         (1) Indian Tribes – N/A
         (2) Alaska Native Village Corp. and Alaska Native Regional Corps. N/A
         (3) Property Acquired Under Certain Circumstances by Units of State and Local Government – N/A
      ii. **EXEMPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY**
         (1) Publicly Owned Brownfield Sites Acquired Prior to Jan. 11, 2002
            a. Describe the circumstances under which the property was acquired.
            The property was purchased for $1 in 1970 see attached deeds.
            b. Provide the date on which the property was acquired:
               May 16, 17, 20, 21, July 25, Sept 11, November 12, 1970 (see attached titles).
            c. Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.
               It is not known when the wastes were disposed at the site, however a Phase II report completed by EDER Associates in January 1990 indicated that waste was disposed on-site prior to GESD acquisition of the site.
d. Affirm that you have not caused or contributed to any release of hazardous substances at the site.

The GESD did not cause or contribute to the release of hazardous materials at the site.

e. Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

The GESD is not at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY – N/A

(1) Bona Fide Prospective Purchaser Liability Protection – N/A
Applicants that acquired property after January 11, 2002 and are asserting the BFPP liability protection (the most common liability protection) must demonstrate that they complied or are complying with all of the requirements listed below.

12. Cleanup Authority and Oversight Structure:

a. Describe how you will oversee the cleanup at the site.

GESD does not plan to enroll in a State program. However, the site cleanup will be completed in accordance with a Remedial Action Work Plan (RAWP), that was submitted to the NYSDEC for review and approval. The Plan describes the remedial actions planned for the Kingsborough Elementary School and states that within 30 days of project completion and receipt of data, a remediation report will be prepared and submitted to NYSDEC. The plan was approved by Kevin J. Wood, P.E. of the NYSDEC Materials Management Division on October 7, 2020.

b. Cleanup response activities often impact adjacent or neighboring properties.

As determined by prior site investigation and noted in the approved site remediation the contamination does not impact neighboring sites.

13. Community Notification:

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA) to summarize:
A draft ABCA is attached to the submission

b. Community Notification Ad (read this) 14 days before application is submitted.
A community notification was published on the GESD Website on November 4, 2021

c. Public Meeting (read this)- applicant must hold a public meeting
A summary of attendees, comments, meeting notes and sign -in sheet is attached to this application.
14. **Statutory Cost Share**

   a. Demonstrate how you will meet the required cost share, including the sources of the funding or services, as required for this cleanup grant.

      The Gloversville Enlarged School District will meet the required $100,000 (20%) cost share by utilizing the district’s capital reserve fund for this Brownfield Cleanup Grant.

   b. Hardship Waiver Request is not being requested.

15. **Waiver of the $500,000 Limit:**

   A waiver for the $500,000 limit is not being requested.

16. **Named Contractors and subrecipients:**

   Gloversville Enlarged School District has not procured a contractor or subrecipient.
Proof of Eligibility