1. **Applicant Identification:** City of Greenville, Alabama  
   P.O. Box 158  
   Greenville, AL 36037

2. **Funding Requested:**  
   a. **Grant Type:** Single Site Cleanup  
   b. **Federal Funds Requested:**  
      i. $500,000  
      ii. NOT requesting a cost share waiver  
      iii. NOT requesting a waiver of the $500,000 limit

3. **Location:**  
   a. City: Greenville  
   b. County: Butler County  
   c. State: Alabama

4. **Property Information:**  
   Old Boss Building  
   1301 East Commerce Street  
   Greenville, AL 36037

5. **Contacts:**  
   a. **Project Director:**  
      Dee Blackmon, City Clerk - Treasurer  
      334.382.2647, ext. 255  
      dee@cityofgville.com  
      P.O. Box 158  
      Greenville, AL 36037

   b. **Chief Executive/Highest Ranking Elected Official:**  
      Mayor Dexter McLendon  
      334.382.2647  
      mayor@cityofgville.com  
      P.O. Box 158  
      Greenville, AL 36037
6. **Population:**


7. **Other Factors Checklist:**

   **Other Factors Checklist**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>X</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>p.3</td>
</tr>
<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td></td>
</tr>
<tr>
<td>Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
<td></td>
</tr>
<tr>
<td>The proposed site is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially 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></td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td></td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td></td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>X</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2002 or later) or is closing.</td>
<td>p.3</td>
</tr>
</tbody>
</table>

8. **Letter from the State or Tribal Environmental Authority** - See attached letter from ADEM.

9. **Releasing copies of Application** – Not applicable. No confidential, privileged or sensitive information is presented in the grant application
November 23, 2021

Dee Blackmon, City Clerk - Treasurer
City of Greenville
119 East Commerce Street
Greenville, Alabama 36037

RE: EPA Brownfields Cleanup Grant
Old Boss Building, 1301 Commerce Street
Greenville, Alabama

Dear Ms. Blackmon:

The Alabama Department of Environmental Management (ADEM) is pleased to continue to support the City of Greenville in its pursuit of a brownfields Cleanup grant from the U.S. Environmental Protection Agency for the referenced facility. Greenville is a beautiful City, situated in the lower central portion of the State in the Black Belt Region. Part of Greenville’s charm is its rich history, beautiful Victorian homes, and abundance of camellias (known as the “Camellia City”).

For all that the Camellia City has to offer, Greenville is not without its issues and challenges. Today, portions of the City that were once thriving are in need of new life. The City has already received and implemented a brownfields assessment grant to evaluate environmental conditions at priority sites, and now desires to pursue a cleanup grant for remediating one of the key priority sites—the Old Boss Building. The Boss property consists of a 13.8-acre parcel of land with dilapidated industrial structures that were built in 1950 and previously used for a variety of manufacturing purposes. Previous environmental studies have indicated the presence of soils impacted by hazardous substances, drums with unknown contents, and building materials that likely contain asbestos and lead based paint. Located at the intersection of Commerce Street and the northern bypass (the east gateway to the City), this former industrial facility is not only an eyesore, but an environmental, health and safety hazard to community residents. Its proximity to adjacent ball parks and residential areas further demonstrates the need for the property to be cleaned up and redeveloped.

We understand that Greenville hopes to create a greenspace area that offers citizens and travelers a place to enjoy while creating a beautiful space at the entrance to the City. ADEM has already provided assistance to the City with a redevelopment visioning session at the local school, and looks forward to continuing to support the City as needed, which could include additional community engagement, entry into the Voluntary Cleanup Program, and technical assistance such as conducting waste characterization at the site as previously requested. We also have some limited funding remaining in our Land Recycling Revolving Loan Fund if you are interested in applying for that.

We wish you and the residents of the Greenville Community success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,

M. Gavin Adams, Chief
Redevelopment Section-Land Division
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
   a. Target Area and Brownfields
      i. Background and Description of Target Area: The picturesque City of Greenville, Alabama is situated in the lower central portion of the State within the East Gulf Coastal Plain of the South, known as the Black Belt Region. When locals think of the quintessential southern home town, Greenville comes to the top of their list. Portions of the popular film Sweet Home Alabama were filmed in Greenville for its quaint southern charm associated with its rich history, beautiful Victorian homes, and abundance of camellias. Greenville has become known as the “Camellia City” and played a major role in the Camellia becoming named as Alabama’s state flower. Because of its location within the fertile “Black Belt”, Greenville was founded as an agricultural trade center, complete with major rail lines to support the cotton industry, the south’s “King Crop”. Found along historic downtown Greenville are several historic districts that have been listed in the National Register of Historic Places.

      Greenville, like most small towns full of southern charm, has a courthouse square at its heart, which is the county seat of Butler County. Over one-third of Butler County’s current population calls Greenville Home. We have a lot of promise to draw upon for future residences and businesses. In 2001, we were ranked #1 in a national survey as the Best Small Town in America, and we are also home to one of the seven stops of the famous Robert Trent Jones Golf Trail that are located throughout the State.

      For all that the Camellia City has going for it, we are not without our issues and challenges. Today, too many people from outside our area have come to know Greenville only as a convenient stopping point along Interstate I-65 on their way southward to the beaches of the Gulf Coast. Our city likely has the greatest selection of fast food restaurants of any rural exit in Alabama. Unfortunately, other portions of our City that were once thriving have begun to decay. With so much of today’s traffic completely by-passing Greenville’s center via I-65, local residents and businesses have been left to struggle and some have been losing the fight. The neighborhoods around Commerce Street, the main artery flowing east-west through the center of town circling the town square, are struggling. In particular, the target area of this grant has been the hardest hit. Higher vacancy rates of houses and businesses and high poverty levels characterize the area. With that in mind, the Commerce Street Corridor is the target area of this grant application, continuing the revitalization of the target area that was the focus of our 2018 EPA Brownfields Assessment Grant.

      Our target corridor encompasses a city block on either side of Commerce Street and extends from US Highway 31 on the east side of town to the south exit of I-65 to the west. EPA Brownfield Assessment grant funds have been used to assess numerous brownfield sites in this target area and to prioritize sites for cleanup and redevelopment. One of the sites already assessed with EPA assessment grant funds that is the focus of this grant proposal is the Old Boss Manufacturing Site, a 1950s-era abandoned manufacturing plant with documented soil impact, drums with unknown contents, and the presence of asbestos and lead-based paint. The Old Boss site is located at the east entrance to the City near existing ball fields and residential areas, and the City plans on clearing the environmental issues, demolishing the dilapidated buildings, and redeveloping the site as greenspace. The Commerce Street Corridor is the target community for the proposed grant funding with the Old Boss Manufacturing site as the proposed site targeted for cleanup activities.

      ii. Description of the Proposed Brownfield Site(s): The Old Boss site consists of a former manufacturing plant located on a 13.8-acre parcel at 1301 East Commerce Street, in an area that serves as the gateway to the City. Residential and commercial properties border the site, in addition to City baseball fields. Constructed in 1950, the property has been used for the manufacturing of textiles (Rigel Textiles), gloves (Boss Manufacturing), metals processing (Integrated Metal Products), and plastic products (Greenville Plastics, Integrated Handling, and Greenville Products Group). The last of these companies closed in 2001, taking 100 jobs with it and leaving an eyesore, safety hazard, and a plethora of environmental issues. The property is partially secured by fencing, but the property was not maintained or monitored by the former absentee owner. Most of the structures of the roughly 50,000 square foot building footprint have collapsed, and are an extreme safety hazard. The site is vulnerable to trespassing issues, which is a serious concern since children are playing sports at the ballpark directly adjacent to the site and are often unsupervised. The remaining structures are now overgrown with kudzu, which is detrimental to the ecosystems that it invades because it smothers other plants and trees. After all appropriate inquiry, the City purchased the property in 2019 to begin cleanup and redevelopment of the site to remove this safety hazard, mitigate the environmental issues, improve the entrance to the City, and create greenspace for our area residents to enjoy.
Prior to purchase, we used our 2018 EPA Brownfield Community-wide Assessment Grant funding to conduct Phase I, II and III Environmental Site Assessments (ESAs) on the property to evaluate site conditions and delineate the extent of impact. These assessments identified several areas of environmental concern, including former electrical transformer areas; containers/drumms of potentially hazardous substances; industrial equipment areas; asbestos-containing materials (ACM) and lead-based paint (LBP) in the dilapidated structures. Soil samples collected during the Phase II and III ESAs revealed the presence of arsenic, benzene, and polynuclear aromatic hydrocarbons (PAH) in soils. Only minor groundwater impact was found. Based on the findings from the Phase II ESA and discussions with the Alabama Department of Environmental Management (ADEM), the recommended cleanup alternative to address these identified soil contaminants includes entry of the site into the Voluntary Cleanup Program (VCP), excavation and Subtitle D landfill disposal of shallow contaminated soils, and institutional controls (environmental covenant) for groundwater. There were six distinct areas of soil contamination identified requiring remediation, estimated at 160 tons (see Section 3.3, Cleanup Plan for a detailed description of each area). Cleanup goals will be based on EPA Residential Regional Screening Levels (RSLs). Numerous 55-gallon drums with unknown contents are also present at the site that must be characterized for proper disposal. Three drums were identified on the exterior, and additional drums were observed within the building, but the total number of drums, their condition, and their contents is unknown. Complete ACM and LBP surveys could not be conducted within the dilapidated buildings due to unsafe conditions, which also means that abatement of these building materials cannot be safely accomplished prior to demolition. Once the demolition is safely completed, the demolition debris piles will be sampled for the presence of ACM and LBP to determine disposal options. Based on the sampling results, the materials will be disposed of at a Construction and Demolition (C&D) landfill or Subtitle D landfill.

The proposed cleanup will result in removal of this unsafe eyesore at the entrance to our City, improve public safety, clean up environmental contaminants documented to be present at the site, and create greenspace for the surrounding impoverished target area community to enjoy.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: Greenville has evaluated numerous alternatives for redeveloping the site after cleanup. The site is located adjacent to a residential community and ballparks, and represents an excellent candidate for use as greenspace, which will fit nicely within the surrounding community. The City had previously considered redeveloping the site for continued new manufacturing, but abandoned that option based on the needs for the community and from meaningful input from the community. The City’s efforts to obtain EPA cleanup funding for the target area and to redevelop the Old Boss site is perfectly aligned with Greenville’s Comprehensive Plan of Action. This Plan was developed with considerable community involvement by our citizens via public meetings and workshops and a 45-member steering committee. The discussions in the meetings led to a basic development framework that was adopted in the final Plan, which included many that relate to the Boss cleanup and redevelopment as greenspace, maintaining Greenville’s hometown character and charm; retaining the existing population and attract new population growth; providing community facilities, and protecting and promoting existing residential areas. Development concepts were then established based on this framework, such as “establish "entrances" to Greenville with gateways to maximize Greenville’s regional location”. While not a revenue generator, Gateway development is a means of welcoming residents and visitors to Greenville and establishing a sense of “place” or arrival to a desirable destination. The eastern side of the City was specifically identified in the Plan as a “Gateway” area, and cleanup of the Old Boss site and redevelopment of it as greenspace will satisfy this concept.

The community and many of the project partners described in Section 2.3.b have been a part of the planning of this reuse and are fully on board with the redevelopment. The majority of residents in the community either worked at the former plant, had a family member that worked there, or was close to someone that did. The remaining dilapidated Old Boss structures are a stark reminder of better times gone by, and the redevelopment will certainly remove the blight thatingers in this neighborhood. It will also be a visual beacon of positive change for the community, as well as promotion of the many benefits associated with greenspace development as described in the following section.

ii. Outcomes and Benefits of Reuse Strategy: Cleanup of the Old Boss site and development as greenspace will create numerous outcomes and benefits. Greenspaces are a great benefit to the environment, as they filter pollutants and dust from the air, provide shade and lower temperatures in urban areas, and reduce erosion of soil into waterways. Other greenspace advantages include helping regulate air quality and climate by reducing energy consumption by counteracting the warming effects of paved surfaces, recharging groundwater supplies and protecting lakes and streams from polluted runoff. The health benefits of greenspace creation are equally impressive, and parks are emerging as important public health solutions in urban communities. A growing body of evidence shows that access to greenspace in urban areas can bring considerable benefits to the health and well-being of city residents.
These benefits may include improved cognitive development and functioning, reduced severity of attention deficit disorders, reduction in obesity, and positive impacts on mental health. Developing the site into greenspace will encourage active living where people can enjoy walking and bike paths, and playing fields, as well as creating opportunities to reduce the occurrence of chronic diseases such as diabetes, heart disease and respiratory problems. Greenspaces improve moods and attitude, reduce stress, improve mental health and creativity, and build social capital. Redeveloping a contaminated former industrial site into a large greenspace is an excellent use of EPA brownfields cleanup funding and will represent a tremendous outcome from a brownfields cleanup action. In addition, the proposed redevelopment will result in a reduction in carbon emissions by providing a large park-like destination within walking distance of many local residents, thus reducing dependence on driving vehicles to enjoy such places. Greenspace development will make the Boss site and surrounding area more attractive, likely leading to increased property values, and job creation in the area as other developments follow. While the dilapidated structures are in such a state of disrepair that they cannot be rebuilt, the substantial volume of bricks on the exterior of the buildings can be reclaimed and marketed for sale, an effective recycling strategy. In fact, the City has already received a letter of interest from a reclamation company who is interested in the bricks. The redevelopment will also remove the blight currently associated with the site, as well as the safety hazards that pose risks to area children and youth who continue to play at the site.

c. Strategy for Leveraging Resources:
   i. Resources Needed for Site Reuse: It should be noted that the City purchased the property in November 2019 out of an earnest desire to see the site redeveloped, and has already utilized leveraged resources to help make it happen. Brownfield grant assessment funds have already been used to evaluate environmental conditions at the site. The ADEM Redevelopment Section has assisted with community outreach efforts in support of this grant application and has indicated that they can provide assistance for additional waste segregation sampling to further determine landfill disposal options (see support letter). These funds are provided on a first come/first served basis, and if awarded this cleanup grant, we will make a formal request for this assistance in the amount of $12,500. Greenville also plans to explore leveraging a loan from the ADEM Alabama Land Recycling Revolving Fund Program that offers low interest loans to government entities on a competitive basis for the remediation of contaminated sites. ADEM has indicated that there is approximately $500,000 left in the loan program as of November 22, 2021, and indicated potential fund availability in their support letter. In addition, local residents and others involved with project planning are offering all levels of assistance, including providing facilities for public meetings; disseminating project information and updates; providing meeting assistance, providing health and GIS data, and serving on the already established Brownfield Advisory Committee (BAC). Additional details on these resources is provided in Section 2.b.

   Other organizations that the City plans to contact for greenspace development assistance include: Alabama Department of Economic and Community Affairs (ADECA); Land and Water Conservation Fund; Department of Agriculture Community Facilities Grant Program; HUD Community Development Block Grant (CDBG) program and the National Park Service Rivers, Trails, and Assistance program.

   ii. Use of Existing Infrastructure: Utilities (electricity, natural gas, sanitary sewer, storm sewer, and water) are already present at the site, and can be easily rerouted to accommodate needs associated with new greenspace development. A large electrical substation is located on the east side of the property, which will provide ample power as needed. The site is located at the corner of two well-developed roads in excellent condition. No other infrastructure is anticipated to be needed for the new development, and development as greenspace constitutes a low-impact project that does not require the installation of significant infrastructure.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
   a. Community Need
      i. The Community’s Need for Funding: Greenville has a population less than 10,000 and is therefore considered a small population city. Over 53% of the population in the target area (combined Census Tracts 9528, 9531, 9532, which surround the Boss site) is primarily minority and low income. The City does not have all of the funds to remediate the Old Boss site due to budgetary constraints, and needs this grant to make it happen. The loss of 100 jobs when the Boss facility closed, along with other businesses that catered to the Boss employee base certainly exacerbated the area poverty. The median home value in the area is 41% lower than the national average, and 32% of housing units in this area are vacant. Community deterioration is not only evident, but possibly connected to the proliferation of blighted brownfield sites located within the target area, including the Old Boss site. Environmental assessments have proven that the Old Boss site is not only an eyesore, but a current environmental and safety hazard located adjacent to residents who are struggling. The roofs and floors are collapsing in most sections of the Old Boss structures and the site is also overgrown with vegetation. The facility

Proposed Target Site: Old Boss Manufacturing Site
used oils and solvents and other hazardous chemicals, with some constituents related to this usage have already been detected at the site. The property is adjacent to a residential neighborhood and children’s sports park, and some homes are within 60 feet of the property. HUD data\(^1\) reveals that foreclosures in the area are up to 6.5%, which is more than five times higher than the national average of 1.2%. The foreclosure rate is even higher at 8.5% in the target area. The following statistics for the target area where Old Boss is located clearly show a community facing significant challenges and who are in need of funding from this cleanup grant:

<table>
<thead>
<tr>
<th>Demographic Information and Sensitive Populations</th>
<th>Target Area</th>
<th>Greenville</th>
<th>Butler County</th>
<th>Alabama</th>
<th>United States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>7,827</td>
<td>7,589</td>
<td>19,828</td>
<td>4,876,250</td>
<td>324,697,795</td>
</tr>
<tr>
<td>Families Below Poverty</td>
<td>20.5%</td>
<td>16.8%</td>
<td>15.6%</td>
<td>12.3%</td>
<td>9.5%</td>
</tr>
<tr>
<td>Female Head of Household with Children</td>
<td>28.4%</td>
<td>17.8%</td>
<td>12.2%</td>
<td>11%</td>
<td>9.9%</td>
</tr>
<tr>
<td>Percent Minority</td>
<td>56.1%</td>
<td>56.8%</td>
<td>49.4%</td>
<td>35.5%</td>
<td>40.3%</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>$30,230</td>
<td>$38,004</td>
<td>$40,688</td>
<td>$50,536</td>
<td>$62,843</td>
</tr>
<tr>
<td>Vacant Housing Units</td>
<td>32.7%</td>
<td>30.1%</td>
<td>35.5%</td>
<td>17.1%</td>
<td>12.1%</td>
</tr>
<tr>
<td>Persons under 5</td>
<td>7.1%</td>
<td>8.2%</td>
<td>5.8%</td>
<td>6.0%</td>
<td>6.1%</td>
</tr>
<tr>
<td>Persons 65 or over</td>
<td>19.01%</td>
<td>18.5%</td>
<td>19.7%</td>
<td>16.5%</td>
<td>15.6%</td>
</tr>
</tbody>
</table>

Source: data.census.gov 2019: ACS 5-Year Estimates. Target Area includes combined Census Tracts 9528, 9531, 9532

\(^{ii.} \) **Threats to Sensitive Populations:**

(1) **Health or Welfare of Sensitive Populations:** As shown in the table above, sensitive populations including minorities, people with disabilities, young children, and persons over 65 abound in the target area. These groups, in addition to others such as pregnant women and young single mothers all face significant health and welfare challenges associated with poverty, crime, lack of access to food and health resources, and environmental impacts. In addition, the Old Boss site presents safety concerns to children and youth who have obviously entered the site based on the presence of graffiti, empty bottles, and candy wrappers. Criminal activity at the site has also been high, as the deteriorated buildings covered by vegetation provide the perfect cover for drug users. Although attempts have been made by the City to restrict site access by installing fencing, trespassing on the property continues to be of concern, putting children at risk. Recent FBI Uniform Violent Crime Reports was reported at 796 per 100,000 for Greenville, versus 532/100,000 for the State of Alabama. An overall crime rate of 5,342/100,000 for Greenville and 3,480/100,000 for the State of Alabama shows an obvious elevation in comparison with Alabama crime rates. The City confirmed the correlation between Greenville’s vacant properties and targeted crime activities, and the police department has indicated that theft of copper wiring from area brownfield sites and vacant houses is commonplace.

Greenville is suffering from other impacts to welfare besides just the rise in property crimes that correspond with the brownfield sites. For example, there is a shortage of community services in the target area including food access, recreation and fitness facility access, access to primary care, and access to dentists. The rate of food access/grocery stores is 14.3 per 100,000 compared to the national rate of 21.1 according to the 2018 US Census Bureau, County Business Patterns data. Further, 39% of the target area is considered to be living in a food desert, which is defined as a low-income census tract where a substantial number of residents have low access to a supermarket or large grocery store.\(^2\) This same source show the rate of recreation and fitness access per 100,000 to be 4.77 compared to the state rate of 7.66 and less than half of the national rate of 10.9. The primary care rate was reported to be 31/100,000 compared to the county rate of 44/100,000 and the national rate of 87.8/100,000. The rate of access to dentists was reported to be 24.8/100,000 compared to the national rate of 65.6.\(^3\) These findings certainly demonstrate conditions that adversely impact the health and welfare of sensitive populations living in the target area.

(2) **Greater Than Normal Incidence of Disease and Adverse Health Conditions:** Overall, Butler County is ranked 57th out of 67 counties in Alabama for “Overall Health Outcomes,”\(^4\) a poor

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3. US Census Bureau, County Business Patterns, Additional Analysis by CARES 2018
4. U.S. Department of Health and Human Services, Health Resources and Services Administration, Area Health Resource File, 2018
The asthma rates in the county are at a shocking 22.1%, nearly twice that for Alabama (12.7%) and the U.S. (13.4%).

Cancer rates are high as well, at 428/100,000. The COVID-19 death rate in Butler County is twice that of the state rate. Low birth weight rates are also higher with Butler County’s rate being 12.4 compared to 10.1, which is 23 percent higher than the state rate. Infant deaths in Butler County are also higher at 16.5 compared to 8.7 (rate per 1,000). Neither the Alabama Department of Public Health (ADPH), nor the City of Greenville has the resources necessary to provide this data on a smaller scale. However, considering the higher percentage of sensitive populations living in the target area, it is not hard to deduce that the statistics would be worse in that community. For example, there is certainly a higher population of minorities living in the target area and the ADPH shows that the rate of infant death rate for Black residents living in Butler County is 25 (per 1,000) compared to 8.7 for white residents (approximately 3 times higher), and infant death from birth defects are higher in Butler County than the rest of the state. In addition, the contaminants associated with the brownfield properties certainly have certainly been linked to health issues such as those found in the target area. The Old Boss site has potential contaminants that include metals, solvents, asbestos, and LBP concerns. Given the dilapidated condition of the site buildings, it is likely that contaminants such as asbestos blow into adjacent neighborhoods during windstorms. Health effects from these contaminants include pharynx, larynx, lung, and ovarian cancers, and COPD.

(3) Promoting Environmental Justice: It has been proven that people belonging to low social classes, as well as children, women, older people and those with established cardiovascular diseases have a greater susceptibility to the effects of environmental stressors, indicative of environmental justice concepts. Greenville has numerous cumulative environmental issues that add concern to the overall public health including environmental justice. As shown in the following table, the sensitive populations within a ½ mile radius of the site appear to experience environmental justice challenges, demonstrated by the community’s overall poor health and the possible associations with the community’s brownfield sites:

<table>
<thead>
<tr>
<th>Environmental Justice Issues- ½ Mile Radius of Boss Site</th>
<th>Percentile - Site Area</th>
<th>Percentile - EPA Region 4</th>
<th>Percentile - USA</th>
</tr>
</thead>
<tbody>
<tr>
<td>EJ Index for PM2.5</td>
<td>83</td>
<td>77</td>
<td>79</td>
</tr>
<tr>
<td>EJ Index for Ozone</td>
<td>83</td>
<td>75</td>
<td>75</td>
</tr>
<tr>
<td>EJ Index for NATA* Air Toxics Cancer Risk</td>
<td>73</td>
<td>65</td>
<td>67</td>
</tr>
<tr>
<td>EJ Index Respiratory Hazard</td>
<td>84</td>
<td>81</td>
<td>84</td>
</tr>
<tr>
<td>EJ Index for HWP*</td>
<td>76</td>
<td>72</td>
<td>69</td>
</tr>
</tbody>
</table>

Source: EPA’s EJ Screen, Radius Report, Printable Standard Report, percentile in the State; bold type indicates an EJ Index worse than the EPA Region 4 and USA. *Hazardous Waste Proximity

Environmental conditions are believed to play an important role in producing and maintaining health disparities, and minority neighborhoods tend to have higher rates of mortality, morbidity, and health risk factors compared to white neighborhoods, even after accounting for economic and other characteristics. In addition, disadvantaged communities encounter greater exposure to environmental toxicants such as air pollution, pesticides, and lead. Cleanup of the Boss site will remove environmental contaminants, and redevelopment of the site as greenspace will lead to improved health by creating a local and accessible area for physical activity. Insufficient physical activity is a modifiable risk factor for many adverse health conditions faced by sensitive populations. While the nearby ball fields provide a place for children to engage in physical activity, they are not accessible to adults who may be most at risk from lack of access to safe areas to exercise. Construction of recreational greenspace using equitable development approaches and intentional strategies to ensure that the low income and minority community near the Boss site will help alleviate this problem.

b. Community Engagement:

i. Project Involvement and b.ii. Project Roles: The site selection, cleanup method, and redevelopment has already been decided with community input from two public meetings held in October 2020 and November 2021, further promoted by a Greenville Elementary School Visioning Contest. Alabama and the Greenville region also have many successful organizations that focus on

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6 Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System. Additional data analysis by CARES. 2011-12. Source geography: County


Proposed Target Site: Old Boss Manufacturing Site
community development and are excited about the cleanup effort and the proposed redevelopment, and will bring their resources to help further develop the greenspace after the cleanup is complete. Current partners include:

<table>
<thead>
<tr>
<th>Name</th>
<th>Point of Contact</th>
<th>Specific Involvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Central Alabama Development Corporation</td>
<td>Ashton Estes, 334.244.6903 <a href="mailto:aestes@scadc.net">aestes@scadc.net</a></td>
<td>Technical assistance with community development needs related to recreational facilities (planning, GIS, revolving loan fund).</td>
</tr>
<tr>
<td>Delta Regional Authority</td>
<td>Kemp Morgan, 662.624.8600, <a href="mailto:kmorgan@dra.gov">kmorgan@dra.gov</a></td>
<td>Work with Governor’s office to find redevelopment resources.</td>
</tr>
<tr>
<td>Greenville Area Chamber of Commerce</td>
<td>Tracy Salter, 334.382.3251 <a href="mailto:tracy@greenville-alabama.com">tracy@greenville-alabama.com</a>;</td>
<td>Mobilize local businesses/community to support the redevelopment; provide meeting space.</td>
</tr>
<tr>
<td>Greenville Elementary School</td>
<td>Belinda Cook, Principal; 334-437-0474; <a href="mailto:belinda.cook@butlerco.k12.al.us">belinda.cook@butlerco.k12.al.us</a></td>
<td>Provide site redevelopment visioning sessions and contest for students, provide location for community meetings.</td>
</tr>
<tr>
<td>Alabama Brownfields Association</td>
<td>Will Burke, President, 205.858.0120 <a href="mailto:WBurke@Geosyntec.com">WBurke@Geosyntec.com</a></td>
<td>Brownfields education; ADEM negotiations; resource sharing.</td>
</tr>
<tr>
<td>Economic Development Partnership of Alabama</td>
<td>Greg Barker, 205.943.4700, <a href="mailto:gbarker@edpa.org">gbarker@edpa.org</a>;</td>
<td>Coordinate with state, regional, local and corporate organizations to bring resources to the project.</td>
</tr>
</tbody>
</table>

**iii. Incorporating Community Input:** We have taken strong steps to ensure meaningful community engagement for the project with a unique eye towards the future, our school-aged children. Our Chamber of Commerce, with the ADEM Redevelopment Section, recently led a redevelopment visioning session with the nearby Greenville Elementary School 4th grade students. Instructions were provided to each of the seven classes to see which class could come up with the best greenspace redevelopment idea. Each student produced drawings depicting that idea, and the best drawing of that idea from each class was selected for entry into the contest. The Chamber Board then selected the top idea, and the winning class received a cookie party for their efforts. Ideas submitted include a water park, sports park, golf course, splash pad/playground, and go cart park.

Dating back to early 2016, we formulated a plan for involving the community in our revitalization efforts which was then incorporated into our 2018 EPA Brownfield Assessment Grant. Using the elements already developed in the Community Involvement Plan (CIP) associated with the assessment grant, we expanded on these initiatives to include the Old Boss Cleanup as the next natural step in our brownfields program. Our CIP already includes a provision for methods of communicating with the public, regularly scheduled meetings with the affected community, meetings of the BAC, and a discussion of the site selection process. The BAC was formed in 2018 and is comprised of representatives from the community, local realtors, bankers, city officials, consultants, members of chambers of commerce, local business and industry representatives, county health and economic development corporations, and environmental representatives. We have held two recent meetings that focused on the Old Boss cleanup. The first was held virtually in last fall due to COVID-19 concerns. An in-person community meeting was held in November at the Boss site, which allowed community members to see the condition of the property up close and get a better feel for how well it is positioned for greenspace development. The meeting was advertised through several methods, promoted by the City and Chamber of Commerce, and interest driven by placement of a large Community Meeting sign on the property at the corner of the intersection. As required by the grant guidelines, notification was given regarding the intent to submit the cleanup grant as well as an update on current activities associated with the ongoing assessment grant. An overview of how the brownfields program and potential benefits to the community were discussed, along with the environmental impacts and planned redevelopment of the Old Boss site. The meeting drew local residents, partners, and City officials. Concerns regarding the impacted site and safety hazards at the site were discussed openly, and the interest level for cleanup of the site and redevelopment for greenspace was high. The meeting was advertised in advance, and a draft of the Analysis of Brownfield Cleanup Alternatives (ABCA)/grant proposal was available for review. No objections to the project were raised, and we are confident that we have full community support for the cleanup and redevelopment of the site.

Once the grant is awarded, an additional meeting will be held prior to scheduling of construction activities, which will be advertised through the previously used effective methods (website updates, social media posts, direct responses by phone, or meetings and email based on the preferences of the

**Proposed Target Site: Old Boss Manufacturing Site**
inquirer). Meetings will be held in person following CDC COVID-19 guidelines when possible, but Google Meet and Zoom Meetings will also be used to be inclusive. Monthly briefings will be posted on the brownfield section of the City website and social media pages as the project progresses. Once cleanup is complete, a ribbon cutting ceremony will be held to celebrate the achievement. ADEM and the EPA will be invited to attend the ribbon cutting along with the local community.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: A draft ABCA that presented several cleanup alternatives to address impacted soils, an estimated 12 drums with unidentified contents, and demolition materials present at the site was developed. Originally prepared in 2020 after the Phase II ESA, the ABCA was updated based on the findings of a Phase III ESA, discussions with ADEM, and a letter of interest was received by the City from a brick reclaiming company. We have a solid plan to clean up the site, summarized as follows:

- **Arsenic, benzene, and PAH-Impacted Soils Remediation and Drum Removal:** Based on the findings from the Phase II and II ESAs and discussions with ADEM, the recommended cleanup alternative to address identified soil impacts includes excavation and landfill disposal of shallow soils followed by institutional controls, and removal of drums. Cleanup goals will be based on EPA Residential Regional Screening Levels (RSLs). There is sufficient data now to develop fairly accurate estimates of the total area of impact and volume of soils requiring cleanup. Soil cleanup will consist of the following:
  o Entry of the site into the ADEM Voluntary Cleanup Program (VCP).
  o Preparation of bid documents for the proposed excavation and solicitation of bids from qualified contractors.
  o Excavation and landfill disposal of an estimated 160 tons of soil from six areas of impact.
  o Segregation of materials into distinct units, and waste characterization of excavated materials using the Toxicity Characteristic Leaching Procedure (TCLP). Based on these results, non-hazardous materials will be segregated from hazardous soils in order to determine landfill disposal options.
  o Collection of confirmation samples from the base and sidewalls of the excavated areas.
  o Based on characterization (hazardous or non-hazardous), transportation of the soils to the appropriate landfill for disposal.
  o Installation of institutional controls (environmental covenant) to restrict groundwater usage (only minimal groundwater impact present).
  o Backfilling of the excavations with clean, imported fill.
  o Waste characterization of accessible drum contents (for disposal determination), and removal/disposal of three drums from the exterior of the structures and those that can be safely accessed on the interior of the structures.
  o Preparation of a final report and ADEM VCP letter of concurrence.

To reduce disposal costs, steps will be taken to segregate hazardous soils from non-hazardous soils. Cost estimates were presented in the attached draft ABCA based on an estimated 30 cubic yards/46 tons of excavated soil being hazardous, and an assumed 75 cubic yards/114 tons of soil being non-hazardous. Total costs for these tasks were estimated at $198,600, which includes soil cleanup, drum removal/disposal, testing, professional oversight and associated VCP fees (Alternative 2 in the ABCA). The actual cost of the soil remediation is dependent on the total actual volume of excavated material and the percentage of material that is deemed hazardous. A full description of the cleanup plan and logic used to estimate the cost is included in the attached draft ABCA. Excavation and landfill disposal of shallow-impacted soils is a common method of cleanup in Alabama, is accepted by ADEM, and ADEM has already conceptually approved the approach.

- **Demolition Debris Containing ACM and LBP:** Due to the dilapidated condition of the onsite buildings it is not practical nor safe to abate ACM or LBP from the buildings prior to demolition. In many places, the exterior walls are essentially free-standing. These walls are constructed of brick and range from one to three stories tall. If possible, the bricks will be removed by a brick recycler prior to demolition using selected through a fair and open competitive process. The remaining structures will then be razed and the materials placed in distinct, manageable stockpiles that will be sampled to confirm the presence of ACM/LBP. Materials that do not contain ACM/LBP will be disposed of at the Construction and Demolition (C&D) landfill owned by the City (portion of costs applied toward the required Cost Share). Materials that do contain ACM will be disposed of at Subtitle D landfill as required by ADEM. This approach has been approved by ADEM and the EPA on several other EPA-funded cleanup grants at former industrial building demolition waste sites in the State, so regulatory approval should not be an issue. For cost estimating purposes and as presented
in the draft ABCA, a total of 9,000 cubic yards/18,000 tons of material are estimated to be generated from the demolition work, with 50% of the demolition piles containing ACM/LBP and requiring special handling/landfill disposal procedures. The total cost for this task was estimated at $380,000 in the draft ABCA.

- **Summary:** Based on the scope and estimates in the draft ABCA, soil remediation/drum disposal costs are estimated at $198,600, and the ACM demolition waste disposal at $380,000, for a total cleanup cost of $578,600. The estimate for soil excavation and disposal is considered to be reasonable since adequate sampling has been conducted during Phase II and III assessments using EPA brownfield assessment funds. Variables associated with the disposal of the ACM/LBP wastes are described in detail in the draft ABCA. To meet the required 20% cost share, the City will pay the VCP and restrictive covenant fees to ADEM; use our own in-kind resources (heavy equipment such as trackhoes, bulldozers, and dump trucks, qualified operators) for portions of the work, and subsidize a portion of the waste disposal costs for materials that are transported to the City landfill.

**b. Description of Tasks/Activities and Outputs:** The cleanup grant guidelines for this section requests that (i) Project Implementation; (ii) Anticipated Project Schedule (iii) Task Activity/Lead, and (iv) Outputs be addressed. Due to the close relation between these items and for ease of presentation, we have addressed these criteria in a single table, provided below. This table provides a detailed listing of the major tasks to be completed, the activities/subtasks associated with each task, the schedule for completion, who will lead task efforts, and the anticipated outputs. Projected costs for each of the major subtasks/outputs are included in Section 3.C, Cost Estimates.

<table>
<thead>
<tr>
<th>i. Project Implementation / Tasks</th>
<th>ii. Activities/Subtasks</th>
<th>iii. Details</th>
<th>iv. Outputs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TASK 1</strong> Project Management/ Reporting</td>
<td>Execute Cooperative Agreement</td>
<td>30 days after award</td>
<td>Applicant</td>
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<tr>
<td></td>
<td>Grant Management</td>
<td>Continuous</td>
<td>Applicant</td>
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<td></td>
<td>Select/Finalize Contract with Environmental Professional (EP)</td>
<td>60 days after award</td>
<td>Applicant</td>
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<td></td>
<td>Prepare EPA Progress Reports</td>
<td>Quarterly</td>
<td>Applicant &amp; EP</td>
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<td></td>
<td>Travel to Brownfield Conference</td>
<td>Year 1</td>
<td>Applicant</td>
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<td></td>
<td>Kickoff Mtg with EPA and BAC</td>
<td>60 days after award</td>
<td>Applicant</td>
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<td>Final Closeout</td>
<td>30 days after grant closeout</td>
<td>Applicant and EP</td>
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<tr>
<td><strong>TASK 2</strong> Community Involvement</td>
<td>Update CIP (prepared for assessment grant)</td>
<td>30 days after award</td>
<td>Applicant and EP</td>
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<tr>
<td></td>
<td>Community Mtgs.</td>
<td>Quarters (Q) 1, 4, and 5</td>
<td>Applicant and EP</td>
</tr>
<tr>
<td><strong>TASK 3</strong> Cleanup Planning</td>
<td>Engage brick recycler to remove bricks from buildings</td>
<td>Q2</td>
<td>Applicant</td>
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<td></td>
<td>ADEM VCP Mtg. and VCP Enrollment, and evaluate need for health monitoring</td>
<td>Q2</td>
<td>Applicant and EP</td>
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<tr>
<td></td>
<td>Site-Specific QAPP</td>
<td>Q1</td>
<td>EP</td>
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<tr>
<td></td>
<td>Final ABCA</td>
<td>Q2</td>
<td>EP</td>
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<tr>
<td></td>
<td>Prepare Bid Documents for Soil Excavation</td>
<td>Q2</td>
<td>EP</td>
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<tr>
<td></td>
<td>Soil Excavation Subcontractor Selection</td>
<td>Q2</td>
<td>EP</td>
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<tr>
<td></td>
<td>Begin Planning for Building Demo</td>
<td>Q2</td>
<td>Applicant and EP</td>
</tr>
<tr>
<td><strong>TASK 4</strong> Cleanup Activities</td>
<td>Soil Excavation/ Transport / Disposal</td>
<td>Q4</td>
<td>EP and Applicant</td>
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<td></td>
<td>Confirmation Sampling/Backfilling</td>
<td>Q4</td>
<td>EP</td>
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<td></td>
<td>Demolish buildings and prepare for ACM/LBP removal</td>
<td>Q5</td>
<td>Applicant</td>
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<td></td>
<td>Confirmation sampling of demo waste piles for ACM/LBP</td>
<td>Q6</td>
<td>EP</td>
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</tbody>
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Proposed Target Site: Old Boss Manufacturing Site
c. Cost Estimates: The anticipated budget for each of the tasks described above, and details on the 20% cost share, are provided in the following table:

<table>
<thead>
<tr>
<th>Cost Estimates</th>
<th>Project Tasks ($)</th>
<th>Budget Categories</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Direct Costs</td>
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<td></td>
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<td>Personnel¹</td>
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<td>Travel</td>
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<td>Equipment</td>
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<td>Supplies</td>
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<td>Contractual</td>
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<td></td>
<td>Other</td>
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<tr>
<td>Direct Costs</td>
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<td>Total Direct Costs</td>
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<td>Indirect Costs</td>
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<td>Total Federal Funding</td>
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<tr>
<td>(not to exceed $500,000)</td>
<td>$11,600</td>
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<tr>
<td>Cost share (20% of requested federal funds)</td>
<td>$43,500⁷</td>
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<tr>
<td>Total Budget (Total Direct Costs + Indirect Costs + Cost Share)</td>
<td>$11,600</td>
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<td>Federal Funding Details</td>
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<td>Cost Share Details:</td>
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<tr>
<td>Note: The total estimated project cost is $578,000. The $500,000 grant from the EPA, along with the committed 20% cost share from the City should be adequate to cover all anticipated project costs. We will also request funds/technical assistance from ADEM using their technical assistance funds to offset a portion of the costs.</td>
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d. Measuring Environmental Results: We will carefully track all outputs and outcomes (described in Section 3.c.ii) required in EPA Order 5700.A to ensure the grant funds are expended in a timely and efficient manner. These will be clearly identified in the project Work Plan and will be reported in the quarterly progress reports submitted to the EPA Project Officer via the EPA ACRES database. The mechanism for tracking progress has already been established with the assessment grant, which includes preparation of a detailed schedule for submittal of draft and final compliance reports with assignments; submittal of project schedules by the EP for each task with each task proposal; weekly communications between project team members via email, phone, and review of technical data via online screen sharing applications to aid in the decision process. If progress is not meeting the new project schedule established for this cleanup grant, countermeasures (meetings with the EP, contractors, ADEM, EPA to establish root cause and corrective actions) will be implemented to get the project back on track. Key tasks and outputs to ensure the desired environmental results are achieved within the 3 year grant window are presented in the table in Section 3.b above.

Anticipated outcomes from the cleanup include liability protection via the ADEM VCP; alignment of EPA funding objectives with redevelopement; removal of blight; reduction or elimination of future contaminant exposure; and the return of site to productive use that creates jobs for the local
community and improves economic conditions. These outcomes align well with EPA strategic plan objectives.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
   a. Programmatic Capability
      i. Organizational Structure: Our City staff are highly skilled in preparation, coordination, oversight, and monitoring of state and federal grants, including the current brownfield assessment grant. (see Section 4.b.). While specific grant duties will be delegated across several departments, the City Clerk’s Office will administer the grant with assistance from the Building and Planning Department. These groups interact frequently and attend regularly scheduled meetings. The Building and Planning Department will oversee all environmental project related work, while an environmental consultant will be retained to also assist with grant management and reporting. Dee Blackmon, City Clerk-Treasurer, successfully managed the 2018 $300,000 brownfields assessment grant and will serve as the grant administrator for the Cleanup Grant. A Certified Revenue Municipal Officer, Ms. Blackmon has been with the City since 1999. She has overseen multiple federal, state and local grants from multiple agencies in excess of $12 million. Others assisting Ms. Blackmon include Christy Bozeman (11 year City administrative employee who has worked on many grants within the Department of Community Development & Planning), and Mayor Dexter McLendon (5th term Mayor who has played an instrumental role in making sure the City applies for grants to improve infrastructure, housing, health and safety, economic opportunity, and overall quality of life for the citizens). This long-serving team already has experience with brownfield grants, and has the track record to successfully manage the cleanup grant.

      iii. Acquiring Additional Resources: The primary additional resource necessary to this project will be a qualified environmental professional (EP) who is experienced with the EPA brownfields cleanup grant process, ADEM’s VCP, and ADEM’s Environmental Investigation and Remediation Guidelines. The EP, contracted by the City in accordance with state and federal guidelines, will be responsible for preparing the final ABCA/cleanup plans; QAPP, VCP application and bid specifications; overseeing site work; environmental sampling; executing waste manifests as an authorized agent of the City; ensuring all quality control objectives are met, and preparing all reports. The EP will also be responsible for preparing all programmatic reports and updating the ACRES database. The EP will coordinate excavation contractors, drillers, Subtitle D landfills, hazardous waste transporters, and laboratories. City construction personnel will work in coordination with the EP, providing in-kind services on tasks not requiring full hazardous waste worker training. The EP will be overseen and monitored by the City’s Brownfields Grant Administrator.

   b. Past Performance and Accomplishments: We successfully managed our 2018 EPA Brownfields Assessment Grant, and have significant experience managing other federal and state grants. The City Clerk’s Office upholds high standards and a top of the line reputation where grant administration is concerned. We continue to receive high marks from EPA, ADECA, FAA and ALDOT for grant management.

         (1) 2018 Brownfields Assessment Grant Accomplishments: We were awarded an EPA Brownfields Assessment Grant on October 1, 2018 (No. 00D70918, ending on September 30, 2021). Accomplishments/outputs include three community meetings (November 15, 2018, November 25, 2019, and October 12, 2020); completion of the Generic QAPP; completion of six Phase I ESAs (Old Boss site, Former Butler County Road Maintenance Facility, Former Camellia Service Center, CBC Lounge, Dino’s BBQ, and Xtreme Audio); one Phase I ESA update for the Old Boss site; three site-specific QAPP addendums; a Phase II at the Old Boss site and Xtreme Audio and one Phase III ESA at the Old Boss site; and completion of a draft ABCA and ABCA-revision for the Old Boss site. Other outputs include timely submission of all quarterly and annual reports, and entry of all data entered in the ACRES database. The major outcome has been our decision to purchase the Old Boss site for cleanup and redevelopment based on the findings of the environmental assessments and commitment to the brownfield program.

         (2) Compliance with Grant Requirements: We have submitted twelve quarterly reports, four semi-annual reports, and two annual reports as required by EPA on schedule. Our staff has managed and submitted all project information in ACRES on a timely basis and all information is currently up to date; and we have expended $300,000.00 (100%) of the grant budget at the end of the grant period. All project milestones, work plan tasks, schedules, and Cooperative Agreement terms and conditions have been met.

         Award of this cleanup grant represents a significant next step in the continuity of our already-successful brownfield program, and will result in moving a site from the assessment phase to full redevelopment and the creation of needed greenspace in the target community. We appreciate your consideration of our proposal.

Proposed Target Site: Old Boss Manufacturing Site
THRESHOLD CRITERIA FOR CLEANUP GRANT - CITY OF GREENVILLE, ALABAMA
THRESHOLD CRITERIA FOR OLD BOSS SITE CLEANUP GRANT, CITY OF GREENVILLE, ALABAMA

1. ** Applicant Eligibility:** The City of Greenville, Alabama, is a unit of local government as defined in 40 CFR Part 31.3, and therefore, is an eligible entity to receive an EPA Brownfields Cleanup grant.

2. **Previously awarded Cleanup Grants:** The City of Greenville has never received an EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds:** The City of Greenville has never received an EPA Brownfields Multipurpose Grant.

4. **Site Ownership:** The City acquired ownership of the former Boss Building site on November 26, 2019 (deed attached).

5. **Basic Site Information:**
   a) **Name of the site:** Old Boss Building Site
   b) **Address of the site:** 1301 East Commerce Street, Greenville, AL 36037
   c) **Current owner of the site:** City of Greenville

6. **Status and History of Contamination at the Site:**
   a) **Type of Contamination:** Hazardous substances
   c) **Environmental concerns:**
      - **Soil Impact:** Polynuclear aromatic hydrocarbons (PAH), arsenic, benzene.
      - **Demolition Debris:** Asbestos and lead-based paint.
      - **Other:** Drums of unknown contents possible.
   d) **How Site Became Contaminated, Nature and Extent of Contamination:** The site consists of a 13.8-acre vacant parcel of land located in an area of mixed commercial and residential use. Structures present include the remains of a boiler house, guard shack, and two large industrial buildings that were built in 1950. The largest structure was three stories. The property also included an electrical substation that served the onsite industries. All of the structures are dilapidated and have no structural integrity that will allow safe entry. The roofs and floors are partially to completely collapsed to the ground floor. Asphalt/gravel parking/drive areas are located along the west portion of the property. The remainder of the property consists of grassy areas, wooded areas, and areas of thick vegetation. The entire site is covered in kudzu. Historical research conducted during a Phase I Environmental Site Assessments (ESAs) conducted prior to purchase by the City (using EPA Community-wide Assessment Grant funds) indicate the site was occupied by textile, gloves, metal products, and plastic products manufacturers from 1950 to 2001.
The property has been vacant since 2001. A Phase II and Phase III ESA revealed the presence of arsenic, PAHs, and benzene in six locations in soil at concentrations exceeding Residential Regional Screening Levels (RSLs). No polychlorinated biphenyls (PCBs) were found above RSLs. The anthropogenic arsenic found at the former electric substation was likely used as a pesticide or herbicide. PAHs also slightly exceeded RSLs in groundwater at several locations. The primary contaminants of concern (COC) are arsenic, PAHs, and benzene in soil, likely released during previous manufacturing operations. The impacts to soil are generally between 0-1 feet below ground surface (BGS), which presents a potential for dermal, inhalation and ingestion of contaminants to future occupants and visitors to the property. It is estimated that 160 tons of soil are impacted and will required cleanup. Some of this soil may be hazardous waste. Several 55 gallon drums are also located on the exterior and interior of the buildings with unknown contents. Asbestos-containing materials (ACM) and lead-based paint (LBP) were also observed to be likely in a large percentage of the remaining structures, which cannot be safely sampled or abated without razing the structures. An estimated volume of 9,000 cubic yards/18,000 tons of demolition wastes will be generated, with an estimated 50% of the material containing ACM and/or LBP. Such materials will require special handling and disposal. Refer to the draft Analysis of Brownfields Cleanup Alternatives (ABCA) attached to this application for a more detailed description of the site history, contamination, and proposed method of cleanup.

7. Brownfields Site Definition: The site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications: Greenville has conducted numerous environmental studies at the site to determine environmental conditions using funding from our EPA Community Wide Assessment Grant awarded in 2018. These include a Phase ESA in conducted in accordance with ASTM E1527-13 (dated March 19, 2019); a Phase I ESA Update (dated November 25, 2019); an ASTM E1903-19-equivalent Phase II ESA (dated September 18, 2019); and a Phase III ESA (dated May 2020). The Phase II and III ESAs revealed the presence of arsenic, PAHs, and benzene in soils at the site and suspect ACM and LBP within the dilapidated buildings.

9. Enforcement or Other Actions: There are no ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is requested. There also are no inquiries or orders for federal, state, or local government entities that we are aware of regarding the responsibility of any party (including the City) for the hazardous substances at the site, or any liens.

10. Sites Requiring a Property-Specific Determination: This site does not require a Property-Specific Determination.

11. Threshold Criteria Related to CERCLA/Petroleum Liability
a. Property Ownership Eligibility – Hazardous Substance Sites: The City of Greenville acquired sole ownership of the property from Samana Properties, LLC on November 26, 2019 by fee simple purchase (see attached warranty deed).

The property is eligible for brownfield cleanup grant funding based on the following affirmations:

1. The property is not listed or proposed for listing on the National Priorities List.
2. The property is not subject to unilateral administrative orders, court orders, administrative
orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.

3. The property is not subject to the jurisdiction, custody, or control of the US government.
4. The property is not subject to a planned or ongoing CERCLA removal action.
5. The property is not the subject of a unilateral administrative order, court order, an administrative order on consent or judicial consent decree that has been issued to or entered into by the parties, or been issued a permit by the U.S. or an authorized state under the Solid Waste Disposal Act (as amended by the Resource Conservation and Recovery Act (RCRA)), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SWDA).
6. The property is not subject to corrective action orders under RCRA (sections 3004(u) or 3008(h)).
7. The property is not a land disposal unit that has submitted a RCRA closure notification under subtitle C of RCRA and is not subject to closure requirements specified in a closure plan or permit.
8. The property has not had a release of polychlorinated biphenyls (PCBs) that is subject to remediation under TSCA.
9. The property has not received funding for remediation from Alabama’s Leaking Underground Storage Tank (LUST) Trust Fund.
10. All disposal of hazardous substances at the property occurred before the applicant acquired the property. The City did construct a fence after acquisition to prevent site entry.
11. The applicant did not cause or contribute to any release of hazardous substances at the property.
12. The applicant did not arrange for the disposal of hazardous substances or transport of hazardous substances to the property.
13. The applicant is not potentially liable at the property as an Operator, Arranger, or Transporter.
14. The applicant is not affiliated with the previous property owner (familial, contractual, and financial).
15. The applicant conducted a Phase I ESA All Appropriate Inquiry investigation in compliance with ASTM E1527013. The report was dated March 19, 2019, and was conducted within 180 days prior to site acquisition. The Phase I ESA was conducted by an environmental professional (PPM Consultants, Inc., a 100+ employee environmental firm with 27 years’ experience). The work was conducted for the City pre-acquisition, and was funded by the City’s EPA Brownfields Community-wide Assessment Grant awarded in 2018.

The City of Greenville also asserts Bona Fide Prospective Purchaser (BFPP) Liability Protection and demonstrates compliance with the following requirements:

- The City acquired title to the property after January 11, 2002.
- The City conducted all appropriate inquiries prior to acquiring the property, including a Phase ESA conducted in accordance with ASTM E1527-13; a Phase I ESA Update; an ASTM E1903-19-equivalent Phase II ESA, and a Phase III ESA.
- The City is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination.
- All disposal of hazardous substances at the site occurred before the City acquired the site.
- The City has and will exercise appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the site. The City has installed a chain link security fence with a locking gate to prevent entry.
- The City will comply with any land use restrictions and will not impede the effectiveness or
integrity of any institutional controls associated with response actions at the site.

- The City will provide full cooperation, assistance, and access to authorized persons.
- The City will comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.
- The City will not impede performance of a response action or natural resource restoration.

12. Cleanup Authority and Oversight Structure:

a. Describe how the City will oversee the cleanup at the site(s). The City plans to enter the Alabama Department of Environmental Management (ADEM) Voluntary Cleanup Program (VCP) to secure formal regulatory approvals, expedite document reviews, and obtain transferrable liability protections. A draft ABCA that presented several cleanup alternatives to address the impacted soils at the site was developed, and the final report will consist of a full Voluntary Cleanup Plan for ADEM approval. The recommended alternative, based on the findings from the Phase II and III ESAs and discussions with ADEM, includes excavation and landfill disposal of shallow soils impacted by arsenic, PAHs, and benzene followed by engineering and institutional controls. Cleanup will also include the removal of several 55 gallon drums; and segregation, confirmation sampling, and proper disposal of ACM and LBP after demolition. The City has significant experience with retaining technical expertise to assist with complex projects and will retain a qualified Environmental Professional firm to develop a corrective action plan and cleanup the site. The City will ensure that all procurement actions are undertaken in accordance with City, state and federal procedures, including the competitive procurement provisions of 2 CFR 200.317 through 200.326. The recommended cleanup will consist of the following:

Arsenic, benzene, and PAH-Impacted Soils Remediation and Drum Removal:

- Entry of the site into the ADEM VCP.
- Preparation of bid documents for the proposed excavation and solicitation of bids from qualified contractors.
- Excavation and landfill disposal of an estimated 160 tons of soil from the following six areas:
  - Area 1, Former Electrical Substation: Excavation of 48 cubic yards/67 tons of arsenic-impacted soils from a 1,300 square foot area
  - Area 2, Former Boiler House Area: Excavation of 6 cubic yards/8 tons of benzene-impacted soils from a 525 square foot area.
  - Area 3, NW Corner of North Ancillary Building: Excavation of 19 cubic yards/30 tons of PAH-impacted soils from a 525 square foot area.
  - Area 4, N Side of Main Building: Excavation of 5 cubic yards/8 tons of PAH-impacted soils from a 150 square foot area.
  - Area 5, Between Main Building and North Ancillary Building: Excavation of 7 cubic yards/10 tons of PAH-impacted soils from a 200 square foot area.
  - Area 6, East Side of Main Building: Excavation of 20 cubic yards/29 tons of PAH-impacted soils from a 550 square foot area.
- Segregation of materials into distinct units, and waste characterization of excavated materials using the Toxicity Characteristic Leaching Procedure (TCLP). Based on these results, non-hazardous materials will be segregated from hazardous soils in order to determine landfill disposal options.
- Collection of confirmation samples from the base and sidewalls of the excavated areas.
- Based on characterization (hazardous or non-hazardous), transportation of the soils to the appropriate landfill for disposal.
- Installation of institutional controls (environmental covenant) to restrict groundwater usage.
- Waste characterization of accessible drum contents (for disposal determination), and removal/disposal of three drums from the exterior of the structures and those that can be safely accessed on the interior of the structures.
- Preparation of a final report and ADEM VCP letter.
- Preparation of a final report and placement of restrictive covenants (if required).

**Demolition Debris Containing ACM and LBP:** Due to the dilapidated condition of the onsite buildings it is not practical or safe to abate ACM or LBP from the buildings before the buildings are demolished. In many places, the exterior walls are essentially free standing. These walls are constructed of brick and range from one to three stories tall. If possible, the bricks will be removed by a brick recycler prior to demolition. The remaining structures will then be razed and the materials placed in distinct, manageable stockpiles that will be sampled to confirm the presence of ACM. Materials that do not contain ACM will be disposed of at the Construction and Demolition (C&D) landfill owned by the City (and applied toward the required Cost Share). Materials that do contain ACM will be disposed of at Subtitle D landfill as required by ADEM. This approach has been approved by ADEM and the EPA on several other EPA-funded cleanup grants at former industrial building demolition waste sites in the state, so regulatory approval should not be an issue. For cost estimating purposes and as presented in the draft ABCA, a total of 9,000 cubic yards/18,000 tons of material are estimated to be generated from the demolition work, with 50% of the demolition piles containing ACM and of LBP and thus requiring special handling/landfill disposal procedures.

b. Cleanup response activities: The City already owns the property and the adjacent property to the northwest, and access to other properties will not be required. However, an additional community meeting will be held prior to conducting excavation activities to inform area residents of the remediation activities and to address any concerns that may be raised. Three public meetings have already been held to announce the project.

13. **Community Notification:**

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): A copy of the draft grant application, along with a draft ABCA was provided for review at the first community meeting on November 25, 2019, the second community meeting on October 12, 2020; and an updated ABCA at the November 13, 2021 community meeting. Instructions on where the documents could be reviewed prior to submittal of the grant proposal were provided.

b. Community Notification Ad: The City provided public notification on October 28, 2021 advertising the City’s intent to apply for this cleanup grant, and for the onsite community meeting scheduled for November 13, 2021. This follows other meetings announced and completed in prior years. Several methods of community notification were employed for this grant application, including:

- Community meeting notification placed in the Greenville City Hall lobby.
- Community meeting notification placed on the City of Greenville website.
- Large sign installed on the Boss site advertising the community meeting.
- Site redevelopment visioning contest with Greenville Elementary School 4th grade students, with ADEM assisting.

c. Public Meeting: The latest public meeting to discuss the cleanup grant proposal was held on the Boss site on November 13, 2021 at 10:00 am. A copy of the draft grant application and the draft ABCA was presented, along with instructions on where the documents can be reviewed prior to submittal of the proposal.
d. Submission of Community Notification Documents: Proof of the advertisement for the community meeting, meeting notes, proof of attendance, sign in sheet, meeting minutes, information associated with the Greenville Elementary Visioning Contest, and a copy of the draft ABCA are attached. The meeting was open to all, with no pre-registration. One comment was received by email after the meeting, also attached.

14. Statutory Cost Share:
   a. Demonstration of Meeting Required Cost Share: Greenville understands that we are required to provide a 20% cost share for the total federal cleanup funds awarded in the form of a contribution of direct funds, labor, materials, or services from a non-federal source. Total clean-up costs are estimated at $578,600, but could vary from this amount based on the volume of wastes that needs cleanup once the project is underway. Greenville is requesting $500,000 from the EPA for the cleanup grant and the Greenville City Council has already passed a resolution committing $100,000 to meet the required 20% cost share. This cost share will be met by providing a combination of the following payments and eligible in-kind services:

   - Anticipated payment of $43,500 to ADEM for entry into the Voluntary Cleanup Program
   - In-kind services (City equipment and operators) for portions of the demolition work
   - In-kind services (subsidy/reduced fees for costs associated with disposal of non-hazardous soils and non-ACM/LBP containing wastes at the City landfill)
   - Direct payment to contractors as needed to satisfy required cost share

   b. Hardship Waiver: Not being requested.

15. Waiver of the $500,000 Limit:
Since project costs are estimated to be less than $600,000, and the City has already committed to meet the required 20% cost share of any funds sought for reimbursement, no waiver of the $500,000 limit is being requested.

16. Named Contractors and Subrecipients:
The City will not engage a subrecipient to conduct the work proposed in this application, and will follow all EPA and federal requirements associated with contractor procurements as provided in 2 CFR § 200.319(b).