1. **Applicant Identification**  
   Rock Hill Economic Development Corporation  
   155 Johnston Street, Suite 220  
   Rock Hill, SC 29730

2. **Funding Requested**  
   a. **Grant Type** Single Site Cleanup  
   b. **Federal Funds Requested**  
      i. $423,300  
      ii. Not Applicable  
      iii. Not Applicable

3. **Location**  
   a) City of Rock Hill  
   b) York County  
   c) South Carolina

4. **Property Information**  
   National Fence Manufacturing Site (Rock Hill Annex Property)  
   167 North Lee Street  
   Rock Hill, York County, South Carolina 29730

5. **Contacts**  
   a. **Project Manager**  
      Corinne Sferrazza, Community Development Coordinator  
      803-326-2463  
      Corinne.Sferrazza@cityofrockhill.com  
      PO Box 11706  
      150 Johnston Street  
      Rock Hill, SC 29730
   
   b. **Chief Executive**  
      Jennifer Wilford, Executive Director  
      803-325-2551  
      jennifer.wilford@cityofrockhill.com  
      PO Box 11706  
      155 Johnston Street  
      Rock Hill, SC 29730

6. **Population**  
7. **Other Factors**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>N/A</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
</tr>
<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td>N/A</td>
</tr>
<tr>
<td>Secure 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>Pg 2-4</td>
</tr>
<tr>
<td>The proposed site(s) 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>N/A</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>N/A</td>
</tr>
<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>
<td>N/A</td>
</tr>
</tbody>
</table>

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

9. **Releasing Copies of Applications**
   Not Applicable
November 12, 2021

Brian Gross
Region 4 Brownfields Coordinator
United States Environmental Protection Agency
Resource Conservation and Restoration Division
61 Forsyth Street SW
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Site-specific Cleanup Grant
   Rock Hill Economic Development Corporation, South Carolina

Dear Mr. Gross:

The South Carolina Department of Health and Environmental Control, the State’s environmental authority, acknowledges and fully supports the Rock Hill Economic Development Corporation’s (RHEDC) application for a Brownfields Cleanup Grant. The grant will facilitate environmental cleanup of the former National Fence Manufacturing Company Inc. site in Rock Hill, South Carolina.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the RHEDC in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

[Signature]

Henry Porter, Chief
Bureau of Land and Waste Management

cc: Liz Basil, EA BHES
    Robert Hodges, Manager, Brownfields Program
FY22 Brownfield Cleanup Grant
Narrative
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields
i. Background and Description of Target Area: The City of Rock Hill (population 73,334), the largest municipality within York County and fifth largest within the state of South Carolina, is located in the northern Piedmont area of the state. Charter in 1870, the City has a long and vibrant history, from the indigenous Catawba Indians and the European settlers of the late 1700s, to the textile and manufacturing boom brought on by the Industrial Revolution. The combination of easy access to raw materials, labor and the Charlotte South Carolina Railroad is what helped Rock Hill to thrive throughout several wars and the Great Depression. As with a majority of the textile industry in the South, during the 1960s and 1970s the industry began to crumble as textiles were being outsourced overseas leaving many residents unemployed and destitute consequently effecting future generations. The textile industry, which built this strong community, is now non-existent leaving in its wake blight and vacant buildings throughout the community which has hindered redevelopment for decades. Luckily, there has been a renewed interest in the city, due to the proximity to the Charlotte metro area leading to an increase in sports tourism and new job opportunities related to the services industry. Although Rock Hill has become a major suburb of Charlotte, one of the leading banking and financial hubs in the country, there are still segments of town where the redevelopment need is crucial not only to address potential environmental concerns but because of the sensitive populations residing there. One segment of town still in need of redevelopment is home to several abandoned textile and manufacturing sites located within the city’s designated Textile Corridor, the historic downtown, and the neighborhoods surrounding Winthrop University. The City coined the phrase “Old Town” in 2001 to describe the area but years later the City expanded the project area and rebranded it as “Knowledge Park at Old Town” (Knowledge Park).

The target area for this application is Knowledge Park which is located in Census Tract 605.01. This area is home to a large sensitive population (58% African American and 63% women) living with a number of economic disadvantages, such as high unemployment, low income and high use of food stamps. In addition, the target area is full of blighted industrial sites, such as the National Fence Manufacturing site, inhibiting redevelopment and posing potential environmental risk to residents. This property, located in the target area, is in need of cleanup in order to move forward with the planned redevelopment. Fortunately, Census Tract 605.01 is designated as an Opportunity Zone, which the Rock Hill Economic Development Corporation (RHEDC) intends to market to developers to spur the revitalization needed within Knowledge Park.

ii. Description of Proposed Brownfield Site(s): The former National Fence Manufacturing (NFM) site occupies 2.9-acres within Knowledge Park. The site is currently vacant with only concrete slabs remaining as evidence of the site’s industrial past. The site was acquired by the City of Rock Hill in the 1980s who utilized the site as a materials storage area (gravel, sand, mulch). The last commercial use of the site was fence manufacturing from the 1960s to 1980s. The site has been developed since at least 1910 and has been used as a planning mill, lumberyard, yarn mill, textile mill, and a chain-link fence manufacturing facility. A 2003 Phase I Environmental Site Assessment (ESA) identified the previous property usage as chain-link fence manufacturing which was determined to be a recognized environmental condition (REC). In 2004, a Phase II ESA was conducted at the property to assess the REC. Soil samples contained polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and arsenic above EPA Region 9 Preliminary Remediation Goals (PRGs) for residential soil. Sediment and surface water samples

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1 2015-2019 American Community Survey – US Census
2 City of Rock Hill – Historic Resources Survey Update
from the unnamed creek located approximately 20 feet from the northern property boundary were collected as part of the 2004 Phase II ESA. Sediment samples contained PCBs above PRGs. Surface water samples did not contain any hazardous substances. Groundwater samples contained volatile organic compounds (VOCs) at concentrations exceeding the EPA Maximum Contaminant Levels (MCLs). In 2013, another Phase I ESA conducted at the NFM site identified a former creosote tank on site and a former coal gas manufacturing plant off-site as RECs. Another Phase II ESA was subsequently completed at the site which revealed that SVOCs, PCBs, 1,2-diabromo-3-chloropropane, benzo(a)anthracene, benzo(b) fluoranthene, 1,1'-biphenyl, naphthalene, dieldrin and manganese were detected in samples collected from the parcel at levels exceeding regulatory threshold values for residential sites. Following this assessment, the RHEDC entered into a Non-responsible Party Voluntary Cleanup Contract (VCC) with the South Carolina Department of Health and Environmental Control (SCDHEC) through its Brownfields/Voluntary Cleanup Program (VCP) to limit its liability for existing contamination while planning for clean-up action. Sharing the community’s concern about the hazards at the site, the RHEDC took title in December 2016, several days after an updated Phase I ESA was completed. In 2020, eight soil samples were collected from beneath the former on-site building pads from depths ranging from two feet to nine feet. All eight of the samples were submitted for laboratory analysis of Resource Conservation and Recovery Act (RCRA) Metals, VOCs, and SVOCs. Two of the samples were also analyzed for PCBs and Dowtherm™ constituents. Based on the laboratory analytical results, no VOCs, SVOCs, PCBs, or Dowtherm™ constituents were detected in the samples above the Residential or Industrial RSLs. The metals iron, cobalt, arsenic, and lead were detected above their respective Residential RSLs in several of the soil samples. Additionally, arsenic was detected above its Industrial RSL in two of the samples. It was recommended that a soil management plan be established to direct the management of impacted soils during redevelopment of the property.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans:

As a local non-profit with the primary objective to “benefit the City economically by fostering increased employment opportunities by expansion of business and industry, thereby lessening the burdens of government and combating community deterioration, as well as improving quality of life for our citizens” the RHEDC recognizes the importance of redeveloping sites within Knowledge Park especially the NFM brownfield site. With this understanding, the RHEDC was the driving force for the creation of the 2018 Knowledge Park Action Plan. The purpose of Knowledge Park is to attract new jobs, businesses and visitors to the historic center of Rock Hill; create opportunity, wealth and prosperity for the citizens of Rock Hill; and to create a place in the heart of the city with a distinctive urban lifestyle. This citizen driven plan is made up of eight key focus areas: job and business growth, talent development and attraction, marketing and communication, connectivity, inclusiveness, development, placemaking, and tourism.

By effectively focusing on marketing and communication, RHEDC has been able to foster a sense of community pride and ownership in the Knowledge Park redevelopment efforts. These efforts have attracted the attention and support of numerous investors, including a local development partnership, Southern Street Development (Southern Street). Southern Street has created plans for the target site which includes the development of 94 multi-family housing units which includes affordable housing. Southern Street’s more than $20 million investment in the property aligns directly with the following RHEDC Knowledge Park Action Plan focus areas:

- **Development** – Redevelopment of underused sites and buildings in a way that knits together the entire Knowledge Park area as a unified, coherent urban district;
- **Job and Business Growth** – Rock Hill will make investments, enter into partnerships, provide
incentives, and support activities designed to grow jobs and businesses in Knowledge Park;

- **Placemaking** – Knowledge Park will feature retail and restaurant offerings, arts and culture, diverse housing types, public spaces, and other amenities to make Knowledge Park a destination that is special and memorable for everyone whom experiences it; and,

- **Inclusiveness** – Rock Hill will encourage and support new housing development in Knowledge Park with special focus on housing that meets the needs of populations that struggle to find decent and affordable housing.

In addition to directly supporting the above focus areas, the redevelopment strategy indirectly supports the other Knowledge Park Action Plan focus areas such as:

- **Job and Business Growth** and **Talent Development and Attraction** – by providing a variety of housing options to accommodate the talented workers of various experience levels that are required in order to grow jobs and local business;

- **Marketing and Communications** – by attracting new residents to Knowledge Park and making Knowledge Park part of their “story”, word will spread, informing others;

- **Connectivity** – by providing housing options closer to the city center, this development will bring the residents and workers to the amenities and jobs, reducing the need for long commutes, and easing the burden on both the public and private transportation systems that are readily available to those who will soon reside at the proposed redevelopment; and,

- **Tourism** – by removing blight and creating a safer environment through redevelopment of the target site, Knowledge Park will be a more desirable destination for both locals and visitors.

As Rock Hill continues to grow at an exponential rate due to the growth of nearby Charlotte, the need has been established to make better use of all brownfield properties within the target area. With the help of the EPA funding, residents will not only have an improved quality of life and sense of wellbeing by the remediation of a blighted property, but it will also help the residents feel safe thereby encouraging the use of sidewalks and trails within the target area. Redevelopment at the site not only aligns with the City’s established strategic plan but this redevelopment will bring new job opportunities and create a stronger economy as well as supporting affordable housing developments for the sensitive populations in the target area. By addressing contamination issues, the City and RHEDC are paving the way for future economic growth and job opportunities.

**ii. Outcomes and Benefits of Reuse Strategy:** The remediation of the NFM site will further the Knowledge Park Action Plan goal of **Development** by taking a site that is currently a burden and eyesore to the local community and giving it a beneficial use that continues to fuel the pride and unification that the redevelopment of the Knowledge Park area has instilled in the community. The development will directly create **Job and Business Growth** (economic benefit) in the form of temporary construction and remediation jobs and permanent jobs managing and maintaining the multi-family development. The reuse of the site will embrace the goal of **Inclusiveness**, supporting the high percentage of disadvantaged community members such as those that are faced with the **Environmental Justice** issues of **Low Income, High Poverty, High Unemployment, Racial Residential Segregation, High Housing Cost Burden and Substandard Housing, Distressed Neighborhoods, and Low Transportation Access** by removing blight and replacing it with a quality, affordable housing option with easily accessible job and public transportation options.

A significant benefit of providing increased housing opportunities is the increase in discretionary spending (economic benefit). For many people, including those in the target area, rent is their biggest and most important monthly expense. In the target area, **61% of rented housing units cost the occupants more than 35% of their household income**. Only 43% of renters in the City, 40% in the state, and 41% nationally spend more than 35% of their household income on rent.
severity of this statistic is even more significant when you consider that 72% of the housing options in the target area are renter-occupied compared to 48% in the City, 31% in the state, and 36% nationally. The residents are paying less on their rent, they’re able to spend more on local purchases, keeping the money in the community (economic benefit), beyond the bare necessities, including healthier food (non-economic benefit), better healthcare (non-economic benefit), and other consumer goods. A study by the Center for Housing Policy found that stable and affordable housing may help individuals with chronic diseases such as diabetes and hypertension increase their rates of medical care, maintain their treatment regimens, and achieve better health outcomes.

### c. Strategy for Leveraging Resources

#### i. Resources Needed for Site Reuse:
Southern Street has committed to redeveloping the site in conjunction with RHEDC’s site cleanup activities. The planned redevelopment will include the development of multi-family housing (94 units) that will include affordable housing options. Southern Street’s investment in the project is estimated to exceed $20 million. Structural components (building slabs, asphalt parking, sidewalks, etc.), funded by Southern Street as part of their redevelopment, will be incorporated into site remediation plans, serving as impervious soil caps. Southern Street’s investment in the remediation of the site will be eligible for various tax credits available through the state’s Voluntary Cleanup Program.

Should additional funding be needed to support redevelopment of the site, RHEDC is a 501c3 nonprofit, and is eligible to apply for state and federal grant funding and the State Brownfields Revolving Loan Fund. Although RHEDC has limited financial resources, they work closely with the City of Rock Hill (City) on redevelopment efforts and are currently focusing on Knowledge Park. This partnership is flourishing due to the staff assistance and the ability to leverage funds that the City provides. The RHEDC, with the assistance of the City, will continue to pursue state and federal grant options to further redevelopment efforts within Knowledge Park.

#### ii. Use of Existing Infrastructure:
RHEDC intends to leverage all sources available to create an atmosphere where new residents want to establish a home within Knowledge Park, with one of the first steps being the effective reuse of existing infrastructure and buildings. The City recognized infrastructure in the target area had to be upgraded to ensure successful redevelopment. The City has utilized Tax Increment Financial funding, Bonds, General and Utility Funds, Hospitality Tax, and state and federal grants to fund needed infrastructure projects and advance the target site and others toward reuse. Recent improvements include upgraded water and sewer lines, utility and electrical lines, streetscaping, pedestrian improvements, traffic and parking improvements, road widening, and the replacement of an elevated water tank. The City will continue to support redevelopment efforts by working to acquire additional funding sources.

### 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

#### a. Community Need

##### i. The Community’s Need for Funding:
Knowledge Park is home to a community in need of revitalization. The population of Census Tract 605.01 is 3,171, which is over 4% of the City’s total population concentrated in a relatively small footprint of 1.37 square miles (City: 38.6 square miles). Residents suffer from low income as shown by the per capita income of $15,394 and median family income of $35,041, which is significantly less than the city ($27,959/$61,051), county ($34,010/$82,022), state ($29,426/$66,357), and national ($34,103/$77,263) averages. The percent of all people below the poverty level in the target area is 27%, nearly double the state (15%) and city (16%), and national (13%) averages. To make matters worse, Knowledge Park has a much higher unemployment rate (11%) than the City (6%), state (6%), and nation (5%). As evidenced by these statistics, residents have been

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2. “The Impacts of Affordable Housing on Health: A Research Summary”, Center for Housing Policy
suffering from blight and a lack of industry for years. Most of RHEDC’s funding is tied up in recruiting and growing new businesses, workforce development, and marketing of Rock Hill, leaving very little funding to support this project. With a low-income population and a high unemployment rate, community donations and additional revenue streams to fund additional projects is impossible but funding assistance from an EPA Brownfield Cleanup Grant can pave the way for prosperity, improving the quality of life for those who reside in Knowledge Park.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations:

Within CT 605.01 the sensitive population includes a large number of minorities and women. African Americans make up 58% of the population in the target area, which is nearly five times higher the national average (13%), 63% are women with a median age for all residents of 29 years old, nearly ten years younger than the national average (38 years old).6

The impacts of a non-existent industry and unemployment can be seen throughout the neediest parts of the city. Poverty can create an atmosphere of hopelessness turning individuals to criminal activity. Rock Hill has one of the highest crime rates in America compared to communities of all sizes.6

The City has a rate of 85 crimes per square mile which is 88% higher than the state rate (33/sq. mile) and is triple the national rate (28.3/sq. mile) and the property crime rate in Rock Hill is 47% higher than the national property crime rate.7

In 2019, burglaries and thefts (including automotive) made up 83.2% of all crimes in the city.7 Due to the ominous, vacant, and blighted properties throughout Knowledge Park most locals know better than to walk around that area at night as the veil of darkness creates an opportunity for illegal activity. Residents of this community cannot afford a tax increase to pay for additional police services to patrol these structures, but crime could be lessened if the sites were cleaned up and ready for redevelopment.

By addressing blight and crime, residents will be encouraged to make healthy lifestyle changes by getting out in the community and walking to places such as the park, grocery store or their place of employment. Within Knowledge Park 21% of households have no access to a vehicle, which is 2.5 times the national average, making walkability an extremely important part of their lives.6

Increased transportation options and increased walkability is extremely important since those living within this Census Tract are living in a USDA Food Desert.8 Fortunately, in direct line with the Knowledge Park Action Plan Transportation goal, the reuse plan will bring residents closer to jobs and amenities such as the adjoining public park and public transportation options. In the target area, 61% of rented households spend more than 35% of their income on rent, leaving very little money to spend on quality foods, healthcare, and other quality of life items beyond the bare necessities.6

The proposed site reuse will address the above mentioned issues and will facilitate the identification and reduction of threats to the health and welfare of the sensitive populations identified in the target area. Furthermore, this redevelopment effort will reduce housing costs, giving residents the ability to invest in healthy lifestyle changes for generations to come.

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

Hazardous substances such as heavy metals and PAHs on the NMF site are a cause for concern especially when considering potential effects on sensitive populations in the area. Cancer is the leading cause of death in South Carolina. The cancer death rates in York County for whites is 173.4 and for African Americans that number increases by nearly 22% to 221.2.9 The target area ranks in the 95th percentile in the state, 91th in the EPA region, and 93rd in US for Air Toxics Cancer Risk, quite concerning considering several contaminants identified at the site are known carcinogens.10

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8 Community Development Financial Institutions Fund Opportunity Zone Invision Map System
10 EJSCREEN Report (Version 2020)
There is a serious health concern in regard to asthma in South Carolina (Census Tract asthma health data is not available). In adults, 9% currently have asthma with more females (12%) than males (6%) suffering from asthma.\textsuperscript{11} It is also quite concerning that in South Carolina, 8% of children currently have asthma including 13% of African American children.\textsuperscript{12} \textbf{Asthma was the second leading cause of children’s hospitalizations} in South Carolina in 2019, accounting for more than $16 million in emergency department charges and $12 million in hospitalization charges.\textsuperscript{13} In 2019 for adults in South Carolina suffering from asthma, the rate of emergency department visits and hospitalizations were higher for females than males and \textbf{five times higher for African Americans} than whites, accounting for \textbf{$67 million in emergency department charges and $60 million in hospitalization charges}.\textsuperscript{14} This is even more alarming when considering that the target area ranks in the 95th percentile in the State, 90th in the EPA Region, and 91st nationally on the EJ Index for Particulate Matter and the 95th percentile in the State, 90th in the EPA Region, and 92nd nationally on the EJ Screen Respiratory Hazard Index.\textsuperscript{11} Substandard housing has been linked to increased indoor allergen exposure and sensitization and greater asthma morbidity and mortality for low-income minority children living, such as the disadvantaged community members living in the target area.\textsuperscript{15} This health concern can be alleviated by providing quality, affordable housing options such as those included in the site redevelopment plans.

(3) \textbf{Promoting Environmental Justice}: The sensitive populations residing within Knowledge Park are not experiencing the economic growth and vitality of the rest of the City due to the plethora of abandoned textile and manufacturing buildings in the target area which deters potential investors. Blighted and dilapidated buildings cannot only be seen with the large manufacturing and textile sites located at the heart of the community, but also throughout the mill village residential areas of the target area. Currently within CT 605.01, 35% of all homes were built prior to 1979.\textsuperscript{8} This large percent of aging structures, full of potential environmental concerns such as asbestos and lead, is a cause for concern. Those moving to Rock Hill are not interested in purchasing older, dilapidated properties and property values continue to decline with \textbf{median home value in the target area currently at $105,500}, significantly less than that of the \textbf{city ($155,800), state ($162,300), and nation ($217,500)}.\textsuperscript{16} CT 605.01 is also considered by the Department of Housing and Urban Development to be a Low to Moderate Income (LMI) community, with LMI equaling 80% or below of an area’s median income.\textsuperscript{17} The target area is in the 94th percentile in the State, 93rd in the EPA Region, and 94th nationally on the EJ Screen Low Income Population Demographic Indicator.\textsuperscript{10} To make matters worse, \textbf{25% of households in this area receive food stamps}, which is more than the city, state and national (12%) averages.\textsuperscript{17} With low incomes and individuals utilizing government assistance, it is probable these households do not have the funds available to make basic home improvements to address the aging and vacant home issue plaguing the area let alone afford tax increases to fund redevelopment projects to address brownfield issues. The negative economic effects of brownfields and lack of industry can be seen throughout the community and will continue to grow if assessment and remediation do not take place. The planned site reuse will particularly benefit those bearing the \textbf{burden of high housing costs and those residing in substandard housing}; however, it will also benefit many other disadvantaged populations such as those with low income, high poverty, and high unemployment.

\textbf{b. Community Engagement i. Project Involvement & ii. Project Roles:} Several organizations

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{11} SCDHEC BRFSS, 2019
\item \textsuperscript{12} SCDHEC, CHAS, 2016
\item \textsuperscript{13} SC RFA, 2019
\item \textsuperscript{14} SC RFA Inpatient Discharges and Emergency Department Visits
\item \textsuperscript{15} National Center for Biotechnology Information, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4210655/
\item \textsuperscript{16} 2015-2019 American Community Survey – US Census
\item \textsuperscript{17} Department of Housing and Urban Development FY18 LMISD Local Governments by State based on the 2011-2015 ACS
\end{itemize}
\end{footnotesize}
throughout the community have expressed a desire in being a project partners. Below is a sampling of partners who will assist and be involved in making decisions in the process of cleanup and future redevelopment of the priority brownfield site for this project.

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact (name, email)</th>
<th>Specific role in project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rock Hill Council of Neighborhoods</td>
<td>Aubrey Smith,</td>
<td>Community group supporting the economically disadvantaged, will disseminate information.</td>
</tr>
<tr>
<td>Knowledge Park Leadership Group</td>
<td>David Vehaun, <a href="mailto:David.Vehaun@cityofrockhill.com">David.Vehaun@cityofrockhill.com</a></td>
<td>Community outreach group, will contribute facilities, equipment or materials to assist with grant outreach.</td>
</tr>
<tr>
<td>Old Town Association</td>
<td>Cathy Murphy, <a href="mailto:Cathy.Murphy@cityofrockhill.com">Cathy.Murphy@cityofrockhill.com</a></td>
<td>Town preservation association, will assist with community outreach and dissemination of information.</td>
</tr>
<tr>
<td>Southern Street Development</td>
<td>Heath Sessions, <a href="mailto:heath@southstreetdevelopment.com">heath@southstreetdevelopment.com</a></td>
<td>Site Development Team: Will work with RHEDC to complete cleanup and redevelopment of the site.</td>
</tr>
</tbody>
</table>

iii. Incorporating Community Input: RHEDC will continue to work with the public and gather input to assist in making suggestions to the City regarding economic development. A Community Involvement Plan (CIP) will be created with the purpose to outline planned community engagement activities, schedule, project background and key players. During planned monthly meetings, the City and RHEDC has continued to solicit assistance in site reuse and redevelopment ideas. RHEDC has utilized and will continue to utilize the input and information gathered from the neighborhood, community partner meetings and charrettes to advance the brownfield project.

RHEDC intends to use multiple forms of media to ensure the public is aware of the brownfield project progress and to provide alternatives to in-person community engagement when needed. RHEDC’s social media accounts have had a growing audience due to the increase in usage creating a solid platform for disseminating Brownfield project information. In addition, a project brochure explaining the project will be shared throughout the community, and strategically placed at businesses throughout Knowledge Park. Press releases to the local media will keep the community up to date on project milestones and events. RHEDC’s webpage will have a dedicated Brownfield Project section with up to date information on the project and community meetings. In addition, RHEDC board members will provide information during the regularly scheduled meetings (including virtually if needed for social distancing purposes). Activities associated with this project are anticipated to take approximately 24 months to complete and four community meetings are planned to occur at critical project junctures and milestones. Public comment will be accepted at these meetings and through social media leading up to each meeting. Responses to public comments will be made at a minimum during public meetings, but may also be made through social media, as appropriate. The My Ride Rock Hill, all electric bus system is available (free of charge) for those requiring transportation to and from community meetings and outreach events.

RHEDC announced their intent to apply for cleanup funding for the NFM site through the City’s Webpage. On November 17, 2021, a draft Analysis of Brownfields Cleanup Alternatives (ABCA) and a draft of this proposal were made available for public review and comment on this webpage and hardcopies were made available at the Housing and Neighborhood Services office. A virtual public meeting to solicit public input was held via Microsoft Teams on November 24 and comments were accepted until November 30. Input was incorporated into both documents.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: A Draft ABCA was prepared for the subject property. Based upon effectiveness, implementability, and cost considerations, it was determined that excavation and removal of impacted surface soils (0-2 feet in building footprints; 0-1 foot in other areas) and capping with an impermeable barrier (structural components) or a soil cap as dictated by redevelopment activities. Prior to the site remediation activities, a Media Management Plan.
would be developed and approved by the SCDHEC as part of the Voluntary Cleanup Program. Land disturbance permits would be acquired, as necessary, prior to the cap installation activities. The cap area and areas with subsurface soil contamination would be identified and placed under a deed restriction against future soil disturbance activities without prior notice to and approval from the SCDHEC and a Stewardship Plan would be developed to direct long-term obligations and maintenance of the soil cap. It is anticipated that a restrictive covenant against groundwater use would be placed on the site to manage groundwater exposure. This option would address exposure risks using a proven approach consistent with recognized industry standards and would remain comparably cost-effective under most remediation scenarios and site conditions. **Potential contaminant sources and limitations to future land use will remain, but based on the proposed site reuse, the proposed approach will facilitate site development and reuse without unnecessarily putting site workers and public health at risk of exposure of site contaminants.**

The goal of this project is to facilitate redevelopment of the site while protecting human health and the environment from exposure risks associated with site contaminants of concern (CoCs). RHEDC currently anticipates the EPA’s most current Regional Screening Levels for residential properties will be used as the cleanup standards for soil cleanup activities; however, it is possible risk-based cleanup standards may be applied in accordance with state and federal regulations.

**b. Description of Tasks and Activities:** RHEDC is requesting a US EPA Brownfields Cleanup Grant for $423,300 (plus $84,700 cost share; total $508,000) for cleanup of the NFM Site.

<table>
<thead>
<tr>
<th>Task 1: Outreach</th>
</tr>
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<tbody>
<tr>
<td><strong>i. Project Implementation:</strong> RHEDC’s Brownfield Project Manager will develop a Community Involvement Plan (CIP), outreach materials, brownfield project website, and social media posts with the assistance of the environmental consultant (consultant). RHEDC/City staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts) and office supplies to manage the grant.</td>
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<td><strong>ii. Anticipated Project Schedule:</strong> CIP created within 3 months of award (upon completion a more concrete schedule will follow). Community Meetings held 1st, 3rd, 5th, and 7th quarters. Website and Outreach Materials created in the 1st quarter and posted monthly throughout the grant project.</td>
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<td><strong>iii. Task/Activity Lead:</strong> Corinne Sferrazza - Community Development/Brownfield Project Manager</td>
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<tr>
<td><strong>iv. Outputs:</strong> CIP, Brownfield Website, 4 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.</td>
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<tr>
<th>Task 2: Programmatic Support</th>
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<tr>
<td><strong>i. Project Implementation:</strong> RHEDC will procure an environmental consultant to assist with the technical portions of the grant. RHEDC’s Brownfields Project Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule and terms and conditions. The consultant will assist the RHEDC in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the three-year term of the grant. RHEDC staff travel budget allows for two staff to attend two national/regional/grantee brownfield training conferences/workshops.</td>
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<td><strong>ii. Anticipated Project Schedule:</strong> Consultant procurement complete in 1st quarter. ACRES Reporting begins in the 1st quarter &amp; Quarterly Reporting begins in the 2nd quarter and continues throughout the grant project. Yearly Reporting and Forms created in 5th quarter and during final close out.</td>
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<td><strong>iii. Task/Activity Lead:</strong> Corinne Sferrazza - Community Development/Brownfield Project Manager</td>
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<tr>
<td><strong>iv. Outputs:</strong> Procured consultant. ACRES Reporting, 2 Yearly Financial Reports and MBE/WBE Forms, 8 Quarterly Reports, Programmatic Support for 2 year grant period. Two staff to attend 2 conferences.</td>
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<tr>
<th>Task 3: Remediation and Site Management Planning</th>
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<tr>
<td><strong>i. Project Implementation:</strong> RHEDC’s Brownfields Project Manager will oversee the consultant as they finalize the ABCA and prepare QAPPs and Health and Safety Plans and prepare a Media Management Plan.</td>
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</table>

December 1, 2021
Plan and Stewardship Plan.

- **Anticipated Project Schedule:** Initiated 4-6 months of award & updated throughout

- **Task/Activity Lead:** The consultant will handle the technical aspects of the project with oversight from Corinne Sferrazza - Community Development/Brownfield Project Manager.

- **Outputs:** 1 ABCA, 1 Media Management Plan, 1 Site Specific-QAPPs & HASPs, 1 Stewardship Plan

### Task 4: Site Cleanup

#### i. Project Implementation

RHEDC’s Brownfields Project Manager will oversee the consultant as they manage the proposed site cleanup activities including contractor selection, contractor mobilization, contractor oversight, waste characterization sampling, and cleanup reporting.

#### ii. Anticipated Project Schedule

Initiated 6-8 months of award and expected to last up to 12 months (dependent on construction schedule)

#### iii. Task/Activity Lead

The consultant will handle the technical aspects of the project with oversight from Corinne Sferrazza - Community Development/Brownfield Project Manager.

#### iv. Outputs

1 site ready for reuse, 4 remediation jobs created (annualized), 1 cleanup report

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### c. Cost Estimates

Below are the cost estimates and outputs for this project based on past brownfield projects as determined by market standards with contractual hourly rates based on the skills needed for the specific tasks. The budget for this project includes travel, supplies, contractual costs, and a portion of the personnel costs. Indirect costs are not anticipated for this project. **Task 1 – Outreach:** Contractual – Community Involvement Plan $5,000 (40hrs x $125), 4 Community Education Meetings $4,000 ($1,000/meeting), Supplies – Brochures, presentation displays, pens, paper, printer ink $1,500. **Task 2 – Programmatic Support:** ACRES Database Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the two-year grant period $15,500 (124hrs x $125 - $8,000 Personnel/$7,500 Contractual). Travel staff budget for two staff to attend two conferences $5,000 (per person per conference = flights at $750, 3 nights in hotel at $350, incidentals and per diem at $150). Development of bid documents for site cleanup activities, pre-bid meeting, evaluation of bids, and selection of contractors $5,000 (40hrs x $125 - $3,000 Personnel/$2,000 Contractual). **Task 3 – Remediation and Site Management Planning:** Contractual – Finalization of ABCA document, including incorporation of comments from public notice and regulatory review $3,500 (28hrs x $125). Site Specific Quality Assurance Project Plan and Health & Safety Plan $8,000 (64hrs x $125). Media Management Plan $4,500 (36hrs x $125). Stewardship Plan $4,500 (36hrs x $125). **Task 4 – Site Cleanup:** Contractual – Contractor mobilization $6,000. Soil excavation, transport, and disposal $300,000 (2,400 tons at $76 per ton). TCLP Sampling for landfill disposal $45,000 (30 samples at $1,500 each). Soil import, placement, and compaction for soil cap $58,500 (2,250 tons at $26 per ton). Consultant oversight $36,000 (360 hours at $100 per hour). Final state and federal reporting $6,000 (48 hours at $125 per hour).

**RHEDC will satisfy cost share requirements by paying for Task 2 Personnel ($11,000) and Travel ($5,000) Costs in the form of cash payments to contractors and/or for materials required for cleanup (soil for the soil cap, etc.) for Task 4 ($68,700)**

<table>
<thead>
<tr>
<th>Category</th>
<th>Budget Totals</th>
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<tbody>
<tr>
<td></td>
<td>Outreach</td>
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<tr>
<td>Personnel</td>
<td>$11,000</td>
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<tr>
<td>Travel</td>
<td>$5,000</td>
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<tr>
<td>Supplies</td>
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<tr>
<td>Contractual</td>
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<tr>
<td>Total Federal Funding</td>
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<tr>
<td>Total Cost Share</td>
<td>$0</td>
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<tr>
<td>Total Budget</td>
<td>$10,500</td>
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</table>
d. Measuring Environmental Results: RHEDC has processes in place to ensure projects are properly tracked and reported. RHEDC and City staff assisting the project will meet quarterly to track the outputs identified in 3.b. and will report all progress in fulfilling the scope of work, goals, and objectives to the EPA via quarterly reports. In addition, project expenditures and activities will be compared to the projects schedule. Site specific information will be entered and tracked in the ACRES database. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently, countermeasures are in place to address the problem which include monthly calls to their EPA Project Officer and, if needed, create a Corrective Action Plan to get back on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
a. Programmatic Capability
i. Organizational Structure & ii. Description of Key Staff: RHEDC has a small core staff supported by several members of the City of Rock Hill’s staff. The City’s Grants Division and Economic & Urban Development Department will assist in managing this project. **Ms. Jennifer Wilford**, RHEDC Executive Director, will oversee the City’s Brownfield Team Community Development Manager, **Ms. Corinne Sferrazza**, will be responsible for the day to day activities, timely and successful expenditure of funds and completion of technical, administrative, and financial requirements of the project as the Brownfield Project Director. Ms. Sferrazza has managed EPA Brownfield Grant projects for the City for the past 8 years and has 10 years of experience managing federal grants. She will be assisted by **Mr. Jordan Hamrick**, Community Development Assistant, who will serve as Assistant Brownfield Project Manager for this project. Mr. Hamrick has 2 years of experience supporting the City’s Brownfields Assessment grant. They will be assisted by **Ms. Elizabeth Morgan**, the City's Grant Administrator, who will manage grant finances. Ms. Morgan has 10 years of experience managing grant finances and programmatic reporting including the City’s current Brownfields Assessment grant.

iii. Acquiring Additional Resources: Since the RHEDC relies in part on the City for the administration of grant awards, they will follow the procurement rules set forth by the City in the event any additional resources are needed for this project. RHEDC will procure additional resources by using the City’s approved procurement policy. The process is administered by the Procurement and Purchasing Division and led by an experienced Purchasing Manager. Remediation contractors will be procured through a competitive bid process which will include a request for bid, a mandatory pre-bid meeting and bid opening. An environmental consultant will be procured through a competitive selection process based on qualifications and prior experience compliant with the EPA’s "Professional Service" procurement process (2 CFR 200.317-200.326).

b. Past Performance and Accomplishments
ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Accomplishments: In 2018, RHEDC received a $100k Innovation Challenge Grant to continue growing the Knowledge Park Innovation Center, and in 2020, RHEDC received a $75k SCDOC Relentless Challenge Grant. These grants have allowed for several programs such as the technology incubator, Knowledge Park Entrepreneurial Competition, and the Talent Pipeline Apprenticeship Program, just to name a few. The projects met the goals of the award, and RHEDC complied with the agreed upon work plans, schedule, timely reporting and terms and conditions and have expended all funds. (2) Compliance with Grant Requirements RHEDC, with support from the City’s Grants Division, has a history of compliance with grant work plans, schedules and terms and conditions and has a good history of timely reporting with all award agencies. RHEDC is on schedule on active grants. The City’s staff is skilled in project management and is personally monitoring RHEDC’s grant activities to ensure compliance with grant requirements.
FY22 Brownfield Cleanup Grant
Threshold Criteria
Threshold Criteria

1. **Applicant Eligibility**
The Rock Hill Economic Development Corporation (RHEDC) is a 501(c)(3) non-profit entity as described in section 501(c)(3) of the Internal Revenue Code operating in the City of Rock Hill. Documentation from the IRS showing non-profit status has been attached.

2. **Previously Awarded Cleanup Grants**
The RHEDC affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**
The RHEDC affirms it does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership**
The RHEDC acquired title to the site on December 21, 2016. Ownership documentation is available upon request.

5. **Basic Site Information**
   a) Site Name: National Fence Manufacturing Site
   b) Address: 167 North Lee Street
                Rock Hill, SC 29730
   c) Site Owner: Rock Hill Economic Development Corporation (RHEDC)

6. **Status and History of Contamination at the Site**
   a) Hazardous Substances
   b) The former National Fence Manufacturing (NFM) site occupies 2.90 acres within Knowledge Park. The site is currently vacant with only concrete slabs remaining. The site was acquired by the City of Rock Hill in the 1980s who utilized the site as a materials storage area (gravel, sand, mulch, etc). The last commercial use of the site was fence manufacturing from the 1960s to 1980s. The site has been developed since at least 1910 and has been used as a planing mill, lumberyard, yarn mill, textile mill, and a chain-link fence manufacturing facility.
   c) In 2003, Fletcher Group, Inc. conducted a Phase I Environmental Site Assessment (ESA) on the property on behalf of the Catawba Regional Council of Government. Fletcher identified the previous property usage as chain-link fence manufacturing that was determined to be a recognized environmental condition (REC). In 2004, Fletcher conducted a Phase II ESA at the property to assess the REC. Soil samples contained polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and arsenic above EPA Region 9 Preliminary Remediation Goals (PRGs) for residential soil. Sediment and surface water samples from the unnamed creek located approximately 20 feet from the northern property boundary were collected as part of the 2004 Phase II ESA. Sediment samples contained PCBs above PRGs. Surface water samples did not contain any hazardous substances. Groundwater samples contained volatile organic compounds (VOCs) at concentrations that exceed the EPA Maximum Contaminant Levels (MCLs). In 2013, Tetra Tech conducted another Phase I ESA at the NFM site which identified a former creosote tank on site and a former coal gas manufacturing plant off-site as RECs. Following this assessment, the RHEDC entered into a Non-Responsible Party Voluntary Cleanup Contract.
VCC) with the South Carolina Department of Health and Environmental Control (SCDHEC) through its Brownfields/Voluntary Cleanup Program (BF/VCP) to limit its liability for existing contamination while planning for clean-up action. Sharing the community’s concern about the hazards at the site, the RHEDC took title in December 2016, several days after an updated Phase I ESA was completed. Another Phase II ESA was subsequently completed at the site by Tetra Tech which revealed that SVOCs, PCBs, 1,2-diabromo-3-chloropropane, benzo(a)anthracene, benzo(b) fluoranthene, 1,1’-biphenyl, naphthalene, dieldrin and manganese were detected in samples collected from the parcel at levels exceeding regulatory threshold values for residential sites.

d) The site became contaminated as a result of the long history of industrial operations which have occurred at the site dating back to 1910. Most recently, the chain-link fence manufacturing operations which took place on the site are believed to have contributed to the high metals concentrations identified in site soils and is likely to have contributed to other identified concerns.

7. **Brownfields Site Definition**

The RHEDC affirms that:

a) The site is NOT listed or proposed for listing on the National Priorities List;
b) The site 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,
c) The site is NOT subject to the jurisdiction, custody, or control of the United States government.

8. **Environmental Assessment Required for Cleanup Grant Applications**

The following site assessment reports have been completed for the site:

- Site Inspection – National Fence Site: Haliburton NUS Environmental Corporation, 1991
- Phase IESA – National Fence Site: Fletcher Group, Inc., 2003
- Phase II ESA – National Fence Site: Fletcher Group, Inc., 2004
- Limited Soil and Sediment Assessment – National Fence Site: SynTerra, 2008
- Phase I ESA – National Fence Site: Tetra Tech, 2013
- Phase II ESA – National Fence Site: Tetra Tech, 2014

9. **Enforcement or Other Actions**

The RHEDC is not aware of any ongoing or anticipated environmental enforcement actions related to the site for which funding is sought. The RHEDC is not aware of any inquiries or orders from federal, state, or local government entities regarding the responsibility of any party (including the applicant) for the contamination of hazardous substances at the site, including any liens.

10. **Sites Requiring a Property-Specific Determination**

This property does NOT require a property-specific determination.
11. **Threshold Criteria Related to CERCLA/Petroleum Liability**

a. **Property Ownership Eligibility – Hazardous Substance Sites**

i. **Exemptions to CERCLA Liability**

   (1) **Indian Tribes**
   Not Applicable

   (2) **Alaska Native Village Corporations and Alaska Native Regional Corporations**
   Not Applicable

   (3) **Property Acquired Under Certain Circumstances by Units of State and Local Government**
   Not Applicable

ii. **Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability**

   (1) **Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002**
   Not Applicable

iii. **Landowner Protections from CERCLA Liability**

   (1) **Bona Fide Prospective Purchaser Liability Protection**

      (a) **Information on Property Acquisition**

         (i) The RHEDC acquired the site by purchase from a governmental unit.
         (ii) The RHEDC purchased the site on December 21, 2016.
         (iii) The RHEDC is the sole owner of the property and has a fee simple title.
         (iv) The RHEDC purchased the property from the City of Rock Hill.
         (v) The RHEDC does not have familial, contractual, corporate, or financial relationships or affiliations with any person or entity potentially liable for contamination at the site.

      (b) **Pre-Purchase Inquiry**

         The City of Rock Hill, who acquired the property in the early 1980s, utilized the site for materials storage (gravel, sand, mulch, etc.) until 2000, when they ceased all activities on site. The City of Rock Hill did not contribute to any release of hazardous substances at the site during their ownership. During their ownership, the following site assessment activities occurred:

         - **Site Inspection – National Fence Site**: Haliburton NUS Environmental Corporation, 1991
         - **Phase I ESA – National Fence Site**: Fletcher Group, Inc., 2003
         - **Phase II ESA – National Fence Site**: Fletcher Group, Inc., 2004
         - **Limited Soil and Sediment Assessment – National Fence Site**: SynTerra, 2008
         - **Phase I ESA – National Fence Site**: Tetra Tech, 2013
         - **Phase II ESA – National Fence Site**: Tetra Tech, 2014
         - **Phase I ESA – Rock Hill Annex Property (National Fence Site)**: SCS Engineers, 2016

The SCS Engineers ASTM/AAI Compliant Phase I ESA dated December 19, 2016 was completed as part of RHEDC’s pre-acquisition due diligence. Mr. Donald M. Cobb, P.G. of SCS Engineers completed the Phase I ESA. Mr. Cobb, a licensed Professional Geologist, declared that, to the best of his
professional knowledge and belief, that, at the time of the report, he met the definition of Environmental Professional as defined in 312.10 of 40 CFR 312. RHEDC acquired title to the site on December 21, 2016.

(c) Timing and/or Contribution Toward Hazardous Substance Disposal
All disposal of hazardous substances at the property occurred before the RHEDC acquired the property. The RHEDC has not and did not cause or contribute to the release of any hazardous substances on the property. The RHEDC has not arranged for the disposal of hazardous substances at the property or transported hazardous substances to the property.

(d) Post-Acquisition Uses
The site is vacant and has been vacant since the RHEDC acquired the site on December 21, 2016.

(e) Continuing Obligations
Reasonable Steps Taken with Respect to Hazardous Substances Found at the Site:
(i) RHEDC has exercised specific appropriate care with hazardous substances found at the site by taking reasonable steps to stop any continuing releases. The summary of the prior Site Assessments, as described in the “Pre-Purchase Inquiry” section above, indicated that there are no known continuing releases. Based on the planned reuse of the site and typical SCDHEC VCP requirements, impacts to soil and groundwater will be managed through deed restrictions, a Media Management Plan, and a Stewardship Plan, thus fulfilling RHEDC’s continuing obligations in regard to current releases of known hazardous substances found at the site.
(ii) RHEDC will exercise specific appropriate care with hazardous substances found at the site by taking reasonable steps to prevent any future releases. RHEDC has taken steps to prevent any threatened future releases by securing and limiting access to the site and monitoring site conditions. The planned cleanup activities will further prevent threatened future releases. RHEDC intends to utilize cleanup grant funds to place impacted soils beneath a soil cap and/or impermeable barriers, effectively limiting exposure potential and the potential for future releases associated with impacted site soils. Based on the planned reuse of the site and typical SCDHEC VCP requirements, impacts to soil and groundwater will be managed through deed restrictions, a Media Management Plan, and a Stewardship Plan, thus fulfilling RHEDC’s continuing obligations in regard to future releases of known hazardous substances found at the site.
(iii) RHEDC will exercise specific appropriate care with hazardous substances found at the site by taking reasonable steps to prevent or limit exposure to any previously released hazardous substance. RHEDC has taken steps to prevent or limit exposure to any previously released hazardous substances by securing and limiting access to the site and monitoring site conditions. The planned cleanup activities will further prevent threatened future releases. RHEDC intends to utilize cleanup grant funds to place impacted soils beneath a soil cap and/or
impermeable barriers, effectively limiting exposure potential and the potential for future releases associated with impacted site soils. Based on the planned reuse of the site and typical SCDHEC VCP requirements, impacts to soil and groundwater will be managed through deed restrictions, a Media Management Plan, and a Stewardship Plan, thus fulfilling RHEDC’s continuing obligations in regard to past releases of known hazardous substances found at the site.

The RHEDC confirms its commitment:
(i) That it will comply with all land-use restrictions and institutional controls as required by SCDHEC, the VCC, and any future restrictive covenant if required;
(ii) That it will assist and cooperate with those performing the cleanup and provide access to the property. The VCC requires that access be provided to SCDHEC, SCDHEC’s authorized representatives, and all other persons performing response actions on the Property under the SCDHEC’s oversight. This access shall be maintained until remediation is accomplished for unrestricted use and monitoring is no longer required;
(iii) That it will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property though to the best of the RHEDC’s knowledge, there are no information requests or administrative subpoenas that have been issued; and
(iv) That it will provide all legally required notices for this property.

12. Cleanup Authority and Oversight Structure

a. The RHEDC has entered into VCC 13-4832-NRP with SCDHEC, and a Phase II ESA has been conducted by Tetra Tech, TBA contractors for Region 4 EPA, and in accordance with a work plan approved by SCDHEC under the VCC. The VCC requires that all work and reports be performed in accordance with accepted industry standards and signed and sealed by a Professional Engineer or Professional Geologist licensed in South Carolina (SC). Further, all activities must be performed in accordance with applicable SC Statutes and permitting requirements. Sample collection methodologies must be consistent with the US EPA Region 4 Field Branches Quality System and Technical Procedures. All analytical work must be performed by a laboratory that is certified per SC R. 61-81 for the test methods to be used during the analyses. SCDHEC’s review of the Phase II ESA requires some cleanup activity as well as a possible covenant to be placed on the property. The proposed cleanup activities include the following: removal and proper disposal of contaminated surface soils. The RHEDC will work closely with the assigned EPA Region 4 project manager and SCDHEC to ensure the cleanup is completed in a manner which is protective of human health and the environment.

The RHEDC will seek the technical expertise of a brownfield/environmental consultant to manage, oversee, and complete the cleanup activities at the National Fence Manufacturing Site. The RHEDC will select the qualified consultant with brownfields experience through a competitive process in accordance with the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326 and its own procurement requirements that are the same as those of South Carolina.
b. The site is bound on all sides by public roads, with the exception of the northern property boundary. The property to the north of the site is currently owned by the City of Rock Hill who, for the purposes of site cleanup activities has granted RHEDC access to this property. If neighboring property access is necessary for proposed cleanup activities, the RHEDC has a good working relationship with neighboring property owners and can secure access to neighboring properties if needed.

13. Community Notification
a. Draft Analysis of Brownfield Cleanup Alternatives
A Draft ABCA and draft proposal were made available on the City of Rock Hill’s Community Development website on November 17, 2021 in order to allow for the community to provide input and comment. The Draft ABCA is included as an attachment to this proposal.

b. Community Notification Ad
A community notification ad was placed on the City of Rock Hill’s Community Development website on November 17, 2021. The ad indicated that:
- The grant proposal and draft ABCA were made available through the website and the documents were also available for review at the Housing and Neighborhood Services office located at 150 Johnston Street;
- Project staff (contact information was provided) could be contacted should someone wish to provide input or comment;
- The public meeting was held on Wednesday, November 24, 2021 at 11:00 am through Microsoft Teams; and,
- Public comments on the draft proposals were accepted until November 30, 2021 at 4:00 pm.

c. Public Meeting
A public meeting to discuss the draft proposal and ABCA was held on Wednesday, November 24, 2021 at 11:00 am through Microsoft Teams. Comments were accepted until November 30, 2021 at 4:00 pm.

No comments were received, therefore comments and RHEDC’s response to those comments are not included as an attachment; however, the following items from the meeting are included as an attachment:
- Meeting notes; and,
- Meeting sign-in sheets.
d. **Submission of Community Notification Documents**
   No comments were received, therefore comments and RHEDC’s response to those comments are not included as an attachment; however, the following community notification documents are included as an attachment to this proposal:
   - A copy of the draft ABCA;
   - A copy of the ad that demonstrates notification to the public and solicitation from comments on the proposal;
   - Meeting notes; and,
   - Meeting sign-in sheets.

14. **Statutory Cost Share**
   a. The RHEDC will meet the required 20% cost share of $84,700 through a combination of RHEDC funds and the provision of labor for eligible and allowable expenses required to complete the cleanup at the site. This funding for grant support will be budgeted in the RHEDC’s budget annually for each year of the award period.

   **RHEDC will satisfy cost share requirements by paying for Task 2 Personnel ($11,000) and Travel ($5,000) Costs and in the form of cash payments to contractors and/or for clean soil for the soil cap for Task 4 ($68,700).**

   The in-kind salary breakdown for the cost share is explained as follows:

   **Task 2 – Programmatic Support:** ACRES Database Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the two-year grant period $8,000 (124hrs x $125 - $8,000 Personnel). Travel staff budget for two staff to attend two conferences $5,000 (per person per conference = flights at $750, 3 nights in hotel at $350, incidentals and per diem at $150). Development of bid documents for site cleanup activities, pre-bid meeting, evaluation of bids, and selection of contractors $3,000 (40hrs x $125 - $3,000 Personnel).

   **Task 4 – Site Cleanup:** Contractual costs for site cleanup in the amount of $68,700.

   b. The RHEDC will not be requesting a hardship waiver of the cost share.

15. **Waiver of the $500,000 Limit**
   Not applicable.

16. **Named Contractors and Subrecipients**
   Not applicable.