IV.D. Narrative Information Sheet

1. **Applicant Identification**
   Effingham County Board of Commissioners,
   601 North Laurel St
   Springfield, GA 31329-6816

2. **Funding Requested**
   a) **Grant Type**
      Single Site Cleanup
   b) **Federal Funds Requested**
      i. $500,000
      ii. We are **NOT** requesting a waiver of the 20% cost share requirement.
      iii. We are **NOT** requesting a waiver of the $500,000 limit.

3. **Location**
   a) Eden, b) Effingham County, c) Georgia

4. **Property Information**
   Former Atlas Sand & Gravel, Inc.
   3 acre parcel,
   216 Shady Oaks Drive, Eden, GA 31307

5. **Contacts:**
   a. **Project Director**
      Eric Larson
      Assistant County Manager
      Effingham County Board of Commissioners
      601 N. Laurel St
      Springfield, GA 31329-6816
      Phone: 912-754-8061
      Email: elarson@effinghamcounty.org
b. **Chief Executive/Highest Ranking Elected Official**
   Wesley Corbitt
   Chairman At Large
   Effingham County Board of Commissioners
   601 N. Laurel St
   Springfield, GA 31329-6816
   Phone: 912-754-2123
   Email: wcorbitt@effinghamcounty.org

6. **Population:**

<table>
<thead>
<tr>
<th>Area</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effingham County</td>
<td>64,769</td>
</tr>
<tr>
<td>Major Cities:</td>
<td></td>
</tr>
<tr>
<td>Guyton</td>
<td>2,289</td>
</tr>
<tr>
<td>Rincon</td>
<td>10,934</td>
</tr>
<tr>
<td>Springfield</td>
<td>2,703</td>
</tr>
<tr>
<td><strong>Site Area:</strong> Eden</td>
<td><strong>947</strong></td>
</tr>
</tbody>
</table>

7. **Other Factors Checklist:**

<table>
<thead>
<tr>
<th>Sample Format for Providing Information on the Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less</td>
<td>Page 2, IV.D. Narrative Information Sheet &amp; Page 4, Narrative Ranking Criteria</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td></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>Page 3, Narrative Ranking Criteria &amp; Attachment I</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>Page 1, Narrative Ranking Criteria</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></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></td>
</tr>
</tbody>
</table>
8. Letter from the State or Tribal Environmental Authority:
   A letter of acknowledgement from the GA EPD can be found in Attachment F.

9. Releasing Copies of Applications:

   N/A
IV.E. Narrative/Ranking Criteria
1. Project Area Description and Plans for Revitalization
1.a. Target Area and Brownfields
   1.a.i. Background and Description of Target Area
   Effingham County was created in 1777 from the Colonial parishes of St. Matthew and St. Phillip. It is
   the state’s fourth oldest county and is named after Lord Effingham, an English champion of Colonial
   rights. Lord Effingham served as a colonel in the British Army, but resigned his commission rather
   than fight against the rebel colonists during the American Revolution.
   In the early 1900s agriculture was the mainstay of the county economy. The chief agricultural
   products were Irish potatoes and sweet potatoes. The county farmers raised so many Irish
   potatoes in the early 1920s that they were shipped out on railroad boxcars during the summer
   months of those years.
   The target area for this application is located in the Eden Community. Eden was established as a
   stagecoach stop in the early 1800s that ran from Savannah to Darien. The Central of Georgia
   Railroad had a station there as well during that time and was destroyed by General Sherman in
   1864. In its prime, the target area supported businesses such as sawmills, a sand plant, a brick
   factory, a one-room courthouse and some stores.
   During the 1970s, the Atlas Sand & Gravel, Inc. (Atlas Sand), a sand and gravel mine, was
   established. Prior to that, the surrounding target area consisted of undeveloped wooded land. In
   1993, the property was used in connection with the former sand mining operations. Atlas Sand
   owned and operated the sand and gravel mine until 2002, when the majority of the overall sand
   mine property (excluding the subject property), was sold to Effingham County Board of
   Commissioners (ECBOC). A large portion of that property sold to ECBOC consists of a 135-acre
   water body created from the former mining pit. The subject property was separately sold to
   Savannah Abrasives & Filer Sand Corp. on March 1, 1994.
   1.a.ii. Description of the Proposed Brownfield Site(s)
   The specific target area where the proposed cleanup activities will take place is located at 216 Shady
   Oaks Drive in Eden. It is one tax parcel and is approximately 3.0 acres. The parcel is currently vacant
   with a metal pole barn. The site is bordered by wooded land and water to the north, wooded and
   vacant buildings to the south, wooded land and a water body to the east, and wooded land to the
   west, Shady Oaks Road, and Wright Lane.
   The environmental conditions resulting from the use and mixing of sand blast material on the
   subject property were first discovered during an environmental investigation performed by
   Terracon Consultants, Inc. (Terracon) on the surrounding ECBOC property. Terracon performed a
   Phase I Environmental Site Assessment (ESA) on the surrounding ECBOC property in August 2014.
   As part of that Phase I on the surrounding ECBOC property, Terracon visually observed the subject
   property, noticed spent sand blast media and black stained soils.
   In November 2017, Terracon performed a Limited Site Investigation (LSI) or Phase II ESA on
   the ECBOC property. The purpose of the LSI was to assess potential impacts to soil and shallow
   groundwater resulting from the former operations on the subject property. The LSI included the
   installation of eight (8) soil borings throughout the ECBOC property. Following completion of soil
   sampling activities, the eight (8) soil borings were converted into temporary monitoring wells to
   facilitate the collection of groundwater. Results from soil sampling identified concentrations of
   Arsenic and Lead in exceedance of the applicable Georgia Environmental Protection Division (EPD)
Hazardous Site Response Act (HSRA) Appendix I Notification Concentrations (NCs). In addition, arsenic and lead were detected above applicable HSRA Appendix III Groundwater Criteria. The LSI concluded that the sand blast media migrated from the subject property and underlying soils contained arsenic and lead at levels exceeding EPD HSRA standards. However, the sand blast media did not exhibit characteristics of hazardous waste as determined by Toxicity Characteristic Leaching Procedure (TCLP) analysis. In addition, the shallow groundwater beneath the sand blast media deposition area indicated arsenic and lead at levels exceeding EPD HSRA standards.

1.b. Revitalization of the Target Area
1.b.i. Reuse Strategy and Alignment with Revitalization Plans
The property was identified in the Effingham County Comprehensive Plan as property that is ideal for redevelopment. The proposed revitalization of the former Atlas Sand site on Shady Oaks Drive could include numerous recreational activities. Utilizing the existing infrastructure, it is intended to provide public access to the area. The features anticipated for the park are walking trails, passive and active recreational areas, open space lawns and playgrounds. Signage and markers will be indicated throughout the park to provide identifiers and visual aids so that the public will be aware of the amenities. Parking spaces will be designated for patrons. Staging areas for visitors will be provided as well as benches for seating, permanent shade structures, water fountains and designated pet use areas. Educational signage will also be posted for any existing habitat of threatened and endangered plants and animals species living in the area. Through the use of brownfields cleanup funds, Effingham County intends to begin excavation of the contamination in the summer of 2022. A detailed plan has been prepared by Integrated Science & Engineering (ISE) along with detailed specifications developed with the guidance from Geotechnical and Environmental Consultants, Inc. (GEC) for the complete removal of the contaminated soils located within the target area including the removal of sediments in the lake adjacent to the target area. These plans can be reviewed on the ECBOC website www.effinghamcounty.org as well as the website of ISE at www.intse.com click bid document to sign in and review the plans.

1.b.ii. Outcomes and Benefits of Reuse Strategy
The redevelopment of this property will help in the stimulation of economic growth in this area. With state-of-the-art playground equipment, walking/hiking/biking trails and other recreational activities, the Atlas property has the potential to be a great contribution to the community. With vast open spaces, the County plans to host festivals and other community-oriented events that will generate revenue for local businesses and increase the property values of the adjacent area. The County desires to create a safe space that will provide a gathering spot for the young and old, that results in increased opportunities for physical activity with nature education and preservation for all citizens.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse
Effingham County has been successful in leveraging funding for infrastructure improvement projects. Below is a list of significant projects that are underway or completed.

<table>
<thead>
<tr>
<th>Funding Source</th>
<th>Purpose</th>
<th>Funding Amount</th>
<th>Status</th>
</tr>
</thead>
</table>

2
<table>
<thead>
<tr>
<th>Project</th>
<th>Description</th>
<th>Cost</th>
<th>County Match</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>LMIG</td>
<td>6 Roadway Improvements Projects (2021)</td>
<td>$893,913.92 (30% county match)</td>
<td>In process</td>
<td></td>
</tr>
<tr>
<td>LMIG</td>
<td>6 Roadway Improvements Projects (2021)</td>
<td>$1,016,265.13 (30% county match)</td>
<td>Completed</td>
<td></td>
</tr>
<tr>
<td>LMIG OSS</td>
<td>Roundabout</td>
<td>$425,000.00 (30% county match)</td>
<td>Completed</td>
<td></td>
</tr>
<tr>
<td>LMIG SAP</td>
<td>3 Roadway Improvements Projects</td>
<td>$154,20.00</td>
<td>In process</td>
<td></td>
</tr>
<tr>
<td>GA DNR CIG</td>
<td>Stormwater Master Plan (2 year project)</td>
<td>$160,000.00 (50% county match)</td>
<td>In process</td>
<td></td>
</tr>
</tbody>
</table>

These projects listed in the above table show the ability of Effingham County to leverage funding for countywide projects from local, regional, state and federal agencies. ECBOC has budgeted FY2022 SPLOST funds that will be used to leverage funds for project completion and documentation can be found in Attachment I.

1.c.ii. Use of Existing Infrastructure

Existing infrastructure, where possible, will be utilized to accommodate future development of the proposed project cleanup area. With the vast open spaces of existing land and, an existing lake, ECBOC wants to create a safe space that will provide a sought after recreation spot for the young and old, and is committed to providing the financial support for the sites proposed site improvements.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community’s Need for Funding

The Atlas Sand property is located within the Eden Community which was an up and coming vibrant area when it was established. Even with the devastation of General Sherman’s march through the area in the late 1800s, it seemed to be gaining strides in the late 1970s when the Atlas Sand & Gravel, Inc. was established. For close to 40 years Atlas Sand & Gravel, Inc. was a vibrant part of the community, providing jobs and contributing to the economic growth of Effingham County.

The proposed 3.0 acre cleanup site, and surrounding, is a vacant property creating a source of grievance for the community and an opportunity for vandals and unwanted illegal activity. The middle class rural community surrounding the Atlas Sand property would greatly benefit from the rejuvenation of the area. Utilizing the existing infrastructure of the property, the County desires to redevelop the former sand and gravel facility into a new park and nature preservation area that will also be used for local festivals, fairs and farmers markets, thereby providing an economic resource for both the County and surrounding community.

Effingham County plans to use the funding to remove and properly dispose of the contaminated soils and sediments and return the target area into a safe greenspace that will encompass a new community park with environmental preservation and education as a primary goal. The County also plans to develop and implement a Community Involvement Plan (CIP). This plan will be the driving factor in encouraging local community involvement. The plan will include strategies that
will be aimed at improving the level of community awareness regarding this project and any other environmental projects in the county.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The following table provides current demographic information about the target community in comparison to County, State and Nation.

<table>
<thead>
<tr>
<th>Demographics Table</th>
<th>Zip Code 31307 Eden, GA</th>
<th>Effingham County</th>
<th>State of Georgia</th>
<th>United States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>947</td>
<td>64,769</td>
<td>10,711,908</td>
<td>331,449,281</td>
</tr>
<tr>
<td>Unemployment Rate</td>
<td>2.9%</td>
<td>1.9%</td>
<td>3.5%</td>
<td>4.8%</td>
</tr>
<tr>
<td>Poverty Rate</td>
<td>6.92%</td>
<td>9.1%</td>
<td>13.3%</td>
<td>114%</td>
</tr>
<tr>
<td>Percent Minority</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>African American</td>
<td>5.6%</td>
<td>14.3%</td>
<td>32.6%</td>
<td>13.4%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>6.5%</td>
<td>4.9%</td>
<td>9.9%</td>
<td>18.5%</td>
</tr>
<tr>
<td>Median Household</td>
<td>$82,177</td>
<td>$66,822</td>
<td>$58,700</td>
<td>$62,843</td>
</tr>
<tr>
<td>Income</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


The former Atlas Sand & Gravel, Inc. was a source of income for many in the Effingham County area. The closing of the industrial facility resulted in a continuous economic decline. The vacant property provides the opportunity for individuals to trespass and conduct illegal activities. This area also has the potential to attract children and teens, where the exploration of the site, presents health and safety concerns due to possible exposure to contaminants and poor condition of the target property.

In April of 2018, GEC was retained to perform an updated soil and groundwater assessment on the property. The analytical results for the site identified concentrations of arsenic, barium, cadmium, chromium and lead exceeding laboratory detection. The property immediately adjacent to the target property had the same results. This discovery of contamination is shown per the EJSCREEN data on the following report.

The removal of this contamination, as well as safety concerns and redevelopment of the area, will assist in revitalizing the community. The site would provide much needed greenspace that would allow residents to peacefully enjoy the outdoors.
(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions
The EJSCREEN report below shows the populations in the target area that suffer from a greater than normal incidence of diseases or conditions that may be associated with exposure to the contaminants identified in this application.

The property was identified in the Effingham County Comprehensive Plan as property that is ideal for redevelopment. With brownfields cleanup funds, Effingham County intends to begin excavation of the contamination in the summer of 2022. A detailed plan has been prepared by Integrated Science & Engineering (ISE) along with detailed specifications developed with the guidance from Geotechnical and Environmental Consultants, Inc. (GEC) for the complete removal
of the contaminated soils located within the target area including the removal of sediments in the lake adjacent to the target area. This information can be found in the attached ABCA. The EPA funds will contribute to the removal of the identified contaminants from the Shady Oaks site that are needed for remediation.

(3) Promoting Environmental Justice

Redevelopment of this property is a means to attract people to a previously underutilized community asset. Addressing environment justice is a natural fit for preparing this space for public use. It speaks to the fair treatment and meaningful involvement of all people. The vacant property provides the opportunity for individuals to trespass and conduct illegal activities. This area also has the potential to attract children and teens, where the exploration of the site, presents health and safety concerns due to possible exposure to contaminants and poor condition of the target property. The removal of the hazardous waste, is key, to ensuring that no Effingham County citizen is disproportionately affected as it pertains to this site. As previously stated, the Community Involvement Plan will assist the County in taking positive steps to enhance the livability of our citizens and address some critical issues for overall health and well-being.

2.b. Community Engagement

2.b.i. Project Involvement
2.b.ii. Project Roles

Below are partners who will assist ECBOC and be involved in making decisions in the process of cleanup and future redevelopment of the priority brownfields site for this project.

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Specific Role in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Morris, Manning &amp; Martin</td>
<td>Gerald Pouncey</td>
<td>Legal Counsel</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:glp@mmmlaw.com">glp@mmmlaw.com</a>,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>404-504-7738</td>
<td></td>
</tr>
<tr>
<td>Integrated Science and Engineering</td>
<td>Dan Davis</td>
<td>Prepared Engineered Design Plans for removal of the contaminated soils and sediments from the site.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:ddavis@intse.com">ddavis@intse.com</a>, Dana S. Johnson, P.E., CFM <a href="mailto:djohnson@intse.com">djohnson@intse.com</a></td>
<td></td>
</tr>
<tr>
<td>Geotechnical and Environmental Consultants, Inc.</td>
<td>Paige S. Davis, E.I.T.,</td>
<td>Prepared the Prospective Purchaser Corrective Action Plan (PPCAP) on behalf of ECBOC to enter the site into the Brownfields Program</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:pDavis@geconsultants.com">pDavis@geconsultants.com</a>,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Thomas E. Driver, P.E.,</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:tdriver@geconsultants.com">tdriver@geconsultants.com</a></td>
<td></td>
</tr>
<tr>
<td>Terracon Consultants, Inc</td>
<td></td>
<td>Performed Phase I ESA, Limited Site Investigation (LSI) or Phase II ESA on behalf of ECBOC.</td>
</tr>
</tbody>
</table>

2.b.iii. Incorporating Community Input

A public meeting was held on November 12, 2021 to discuss Effingham County’s grant application. An ad alerting the public about the meeting was posted in the local paper, the Effingham Herald. A copy of the draft grant application and the draft Analysis of Brownfield Cleanup Alternatives were available for public viewing at the meeting and will be available for view throughout this process at our Administrative Complex, located at 601 N. Laurel St., Springfield, GA 31329.
ECBOC will solicit involvement in the development of the Community Involvement Plan and will be updated as needed throughout the project. The results of this involvement will be summarized in quarterly progress report.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan
The ECBOC has retained a team of professionals that have conducted site assessments and testing and developed a plan to have the contaminated soils and sediments on and adjacent the target site excavated and properly disposed of thereby returning the site to a stabilized landscaped area that will be redeveloped in to a community park and nature preserve.

Based on the assessments performed at the subject property, additional testing and evaluation at the subject property will be performed, as necessary, in coordination with and input from EPD. ECBOC will work with EPD to formulate an appropriate corrective action approach to address such conditions.

Based on the anticipated nonresidential use of the subject property, ECBOC anticipates certifying soil at the subject property to nonresidential (Type 3 and 4) RRSs. Corrective action for soil, if required, may include excavation and off-site disposal of soils with impacts above applicable RRSs, or another appropriate corrective action method to address such soils. If excavated for corrective action purposes, any excavated soils will be removed, to appropriate depths, based on the additional analytical data. Any excavated material will be stockpiled onsite pending confirmatory and characterization sample results. The stockpiled material will be placed on and covered by polyethylene sheeting while onsite. Additionally, appropriate best management practices will be implemented around the stockpile(s) and excavation(s) to prevent erosion or runoff from the stockpile(s) or excavation(s). Following receipt of confirmatory sample results indicating that all media impacted above the applicable RRSs has been removed, the stockpiled material will be transported, in a polyethylene lined dump truck (or other appropriate container) to an approved disposal facility. The onsite excavation(s) would then be backfilled with clean material obtained from offsite.

Any remediation/excavation activities will be performed in compliance with applicable OSHA regulations, and in accordance with a project specific Health, Safety, and Emergency Plan. Any soil and/or source material generated during corrective action will be managed in such a way to (i) prevent contamination of the surrounding environment (soil, water, and air); (ii) comply with federal, state, and local laws; and (iii) protect personnel.

If soil is imported to the subject property after excavation activities to fill the excavation pit, any imported soil will be tested at a rate of one sample per approximately 1,000 cubic yards.

The plans for the excavation and stabilization of the site are on file with ECBOC and available for review at the County’s website www.effinghamcounty.org and at www.intse.com.

3.b. Description of Tasks/Activities and Outputs

3.b.i. Project Implementation

3.b.ii. Anticipated Project Schedule

3.b.iii. Task/Activity Lead

Task 1 – Cleanup and Reuse Planning: Under this Task, a consultant develops plans and specifications for site remediation of the contaminants that have previously been identified in the
LSI or Level II ESA. Removal and proper disposal of the material is the 1st phase of task 1. The specifications developed in this phase will require compliance with applicable OSHA regulations, and transportation/disposal in compliance with appropriate regulations. Plans and specifications will require stabilization of the site in compliance with applicable regulations.

The County has completed a Level II ESA for the site. The plan for cleanup has already begun by the County retaining a professional team who had evaluated the site and developed a set of construction plans to remove the contaminants and restore the area to a stabilized greenspace for to be used for education, recreation and nature preservation. This will require compliance with applicable OSHA regulations, and transportation/disposal in compliance with appropriate regulations. Plans and specifications will also require stabilization of the site in compliance with applicable regulations.

**Task 2 – Site Cleanup, Recycling, Disposal, and Confirmation Sampling:** The next step is to advertise the project and choose the contactor and begin the remediation. There will be an engineer on site during excavation to take test samples and to ensure that all the contaminated material is removed and disposed of properly.

The plans and specifications will have a bid alternate to allow for bidders to propose a beneficial reuse of the excavated materials. The County has consulted with an engineering firm and materials contractor to explore use of blended sands in concrete. In concept, both the GA-EPD and the SC-DHEC (potential materials manufacturer location) have agreed to this re-use.

**Task 3 – Community Engagement & Involvement:** Under this Task, with the assistance of consultants, Effingham County will development a Community Involvement Plan. The funds will be used to expand on County community and stakeholder involvement specifically related to the Atlas site redevelopment plans. Community groups will be involved in planning activities such as adding educational data to the park such as rain gardens information, native species planting, litter clean ups, community recycling events, installing and maintaining education plaques or species markers/tags for plants. The County Project Manager will dedicate 80 hours to this effort.

Material costs include flyers, mailers, media, newspaper legal announcements, and supplies for meetings. Engagement will focus on the beneficial re-use of the property as a park and how uses such as how the former uses harm the environment, so as not to repeat the same uses elsewhere.

**Task 4 – Reporting:** Staff will submit progress reports and financial status reports to EPA in a timely manner. The consultant will provide a draft and final remediating cleanup report that will include information on all tasks completed.

### Preliminary - Atlas Sand Phase 1 Timeline

<table>
<thead>
<tr>
<th>Task</th>
<th>Status</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complete Construction Plans and Specs</td>
<td>Complete</td>
<td>Jan 2021</td>
</tr>
<tr>
<td>Bid the project for cleanup and stabilization</td>
<td>Pending</td>
<td>Jan 2022</td>
</tr>
<tr>
<td>Open bids evaluate the proposals</td>
<td>Pending</td>
<td>Feb 2022</td>
</tr>
<tr>
<td>Award the Project</td>
<td>Pending</td>
<td>March 2022</td>
</tr>
<tr>
<td>Complete cleanup and stabilization</td>
<td>Pending</td>
<td>Dec 2022</td>
</tr>
<tr>
<td>Officially open the site as a community nature preserve (future park amenities)</td>
<td>In planning</td>
<td>Dec 2022</td>
</tr>
<tr>
<td>Monitor site and report to the EPD</td>
<td>In planning</td>
<td>Dec 2022-2025</td>
</tr>
</tbody>
</table>
3.b.iv. Outputs

Task 1 – Cleanup and Reuse Planning: Plans and specifications will require stabilization of the site in compliance with applicable regulations.

Task 2 – Site Cleanup, Recycling, Disposal, and Confirmation Sampling: remediation/excavation activities will be performed in compliance with applicable OSHA regulations, and in accordance with a project specific Health, Safety, and Emergency Plan.

Task 3 – Community Engagement & Involvement: With the assistance of consultants, Effingham County will develop a Community Involvement Plan.

Task 4 – Reporting: Staff will submit final progress reports, including remediating cleanup and financial status reports to EPA.

3.c. Cost Estimates

3.c.i. Development of Cost Estimates

3.c.ii. Application of Cost Estimates

3.c.iii. Eligibility of the Cost Share

<table>
<thead>
<tr>
<th>Categories</th>
<th>Task 1 – Cleanup and Reuse Planning</th>
<th>Task 2 – Site Cleanup, Recycling, Disposal, and Confirmation Sampling</th>
<th>Task 3 – Community Engagement &amp; Involvement</th>
<th>Task 4 – Reporting</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fringe Benefits</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Travel</td>
<td></td>
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<td></td>
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3.d. Measuring Environmental Results

ECB OC has processes in place to ensure projects are properly tracked and reported. The project team under 4.a.ii will meet quarterly to track the outputs identified in 3.c and will report all progress in fulfilling the scope of work, goals and objectives to EPA via quarterly reports. We will
increase monitoring and communication during the active cleanup phase to act quickly in addressing any unanticipated changes during this critical period. The project budget will be monitored on a monthly basis.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability
4.a.i. Organizational Structure
4.a.ii. Description of Key Staff
Effingham County Board of Commissioners has a team in place to manage this project both strategically and operationally, and have every confidence that they will be able to accomplish the grant-supported work in this proposed project.

Project Manager - The project will be managed by Assistant County Manager Eric Larson, who is a licensed professional engineer, a certified professional in Storm Water Quality, a certified planner by the American Institute of Certified Planners, a certified flood plain manager, and Class III wastewater operator. Financial Management - Mark Barnes is the Interim Finance Director, and along with the Assistant County Manager, will ensure project and fiscal accountability. Mark Barnes is a degreed accountant with eight years of governmental accounting experience. He will work to identify project funding, manage cash flow throughout the project, and record and monitor all program revenues and expenses. He will also provide direction to the Grants Coordinator in monitoring budget expenditures, handling grant reporting, and drafting reimbursement requests. Purchasing Agent – The Purchasing Agent will handle the bidding process for hire of the Project Consultant. Will collaborate with the Project Manager and Project Consultant in the bidding process for construction management. In addition to the existing county staff and project consultant, the County has committed funding for a Capital Projects Manager in the FY 2022 budget. The Capital Projects Manager will have a leading role in daily administration and inspection of the project. Project Partners – Please refer to 2.b.ii. Project Roles, List of Partners.

4.a.iii. Acquiring Additional Resources
If an assessment results in the need for additional expertise and resources to successfully complete the Atlas Sand Mine Remediation Project, Effingham County has a system in place to utilized current resources and/or to go out for bid to seek a qualified firm to serve as a Project Consultant. The successful firm will collect, collate, and submit timely performance data reporting.

4.b. Past Performance and Accomplishments
4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements
(1) Purpose and Accomplishments
(2) Compliance with Grant Requirements
ECBOC has not received an EPA Brownfields Grant but has received other federal or non-federal assistance agreements. Effingham County has a team in place to manage this project both strategically and operationally, and have every confidence that they will be able to accomplish the grant-supported work in this proposed Brownfields project. Below is a list of significant projects that are underway or completed. Please reference project list under 1.c.i. Resources Needed for Site Reuse.
Attachment H – Threshold Criteria Responses
III.B. Threshold Criteria for Cleanup Grants

1. **Applicant Eligibility**
   Effingham County Board of Commissioners (ECBOC) is a general purpose unit of local government and qualifies as an eligible applicant for funding from the EPA Brownfields Cleanup Grant as a local government as defined under 2 CFR 200.64.

2. **Previously Awarded Cleanup Grants**
   ECBOC affirms that the 216 Shady Oak Drive site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**
   ECBOC affirms that we do not have any existing multipurpose grant funds.

4. **Site Ownership**
   ECBOC acquired ownership of the 3.00 acre parcel located at 216 Shady Oak Drive site, through a limited warranty deed from the State of Georgia on October 23, 2020.
   ECBOC has attached a letter from GA EPD’s acknowledging that we plan to apply for FY22 federal brownfields grant funds to conduct cleanup activities.

5. **Basic Site Information**
   a) **Name of the Site:** Atlas Sand Mine
   b) **Address of the Site:** 216 Shady Oak Dr, Eden GA
   c) **Current Owner of the Site:** Effingham County Board of Commissioners

6. **Status and History of Contamination at the Site**
   Identify:
   a) **whether this site is contaminated by hazardous substances or petroleum:**
      Yes, the site has hazardous substances; sand blast material contaminated with lead, arsenic and barium.
   b) **the operational history and current uses(s) of the site:**
      The target area is located in the Eden Community. Eden was established as a stagecoach stop in the early 1800s that ran from Savannah to Darien. The surrounding target area consisted of undeveloped wooded land until the Atlas Sand & Gravel, Inc. (Atlas Sand), a sand and gravel mine, was established in the late 1970s. The site is currently vacant with a metal pole barn and the site surrounding Atlas Sand property is not in use.
   c) **environmental concerns, if known, at the site:**
      As stated in the draft Analysis of Brownfield Cleanup Alternatives, in April 2018, GEC was retained to perform an updated soil and groundwater assessment on the Atlas Sand property immediately adjacent to 216 Shady Oak parcel where sand blasting material was handled and mixed. As part of the assessment, GEC collected ten (10) soil samples and installed five (5) groundwater monitoring wells immediately adjacent to the Shady Oaks property.
      The analytical results for the soil site identified concentrations of arsenic, barium, cadmium, chromium and lead, exceeding the laboratory detections. The detections were compared to the HSRA NCs and arsenic, barium and lead, and were detected above their respective NCs in 11 of the 15 sample locations at depths ranging from surface to 5-feet bgs. The detections were compared to the Groundwater Criteria and
arsenic and lead were detected above their respective limits in 3 of the 5 sample locations. Exceedances were detected in both the filtered and unfiltered samples. Based on the results of its investigation of the areas of the Atlas Sand property immediately adjacent to the subject property, GEC recommended testing on the 3-acre Shady Oaks site (i.e. source property) and the immediately adjacent ECBOC property to determine the full extent of the impact originating from the subject property.

d) how the site became contaminated, and to the extent possible, describe the nature and extent of the contamination:

Based on review of available historical information, the area surrounding the subject property consisted of undeveloped wooded land until the development of a sand and gravel mine by Atlas Sand & Gravel, Inc. (Atlas Sand) in the late 1970s. Starting in 1993, the subject property was used in connection with the former sand mining operations. Atlas Sand owned and operated the sand and gravel mine until 2002, when the majority of the overall sand mine property (but the subject property) was sold to ECBOC. A large portion of that property sold to ECBOC consists of a 135-acre water body created from the former mining pit. The subject property was sold to Savannah Abrasives & Filer Sand Corp. on March 1, 1994.

Visual observations and environmental testing of the subject property and the immediate surrounding property identified sand blast material in shallow soil. This material reportedly was mixed on the subject property with natural mined sand to create greater connectivity in the sand. It appears to have been used on the subject property and then over time spread unintentionally by the owner of the subject property across the subject property and over the subject property’s boundary to immediately adjacent areas.

7. Brownfields Site Definition

The Shady Oaks property site is an industrial “real property, expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.”

ECBOC affirms that the targeted Shady Oaks Drive property is NOT any of the following:

a) not listed or proposed for listing on the National Priorities List;

b) 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) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

In November 2017, Terracon performed a Limited Site Investigation (LSI) or Phase II ESA on the ECBOC property. The purpose of the LSI was to assess potential impacts to soil and shallow groundwater resulting from the former operations on the subject property. The LSI included the installation of eight (8) soil borings throughout the ECBOC property. Following completion of soil sampling activities, the eight (8) soil borings were converted into temporary monitoring wells to facilitate the collection of groundwater. Results from soil sampling identified concentrations of arsenic and lead in exceedance of the applicable Georgia Environmental Protection Division (EPD) Hazardous Site Response Act (HSRA) Appendix I Notification Concentrations (NCs) in our ABCA. In addition, arsenic and lead were detected above applicable HSRA Appendix III Groundwater Criteria in the ABCA as well.
The LSI concluded that the sand blast media migrated from the subject property and underlying soils contained arsenic and lead at levels exceeding EPD HSRA standards. However, the sand blast media did not exhibit characteristics of hazardous waste as determined by Toxicity Characteristic Leaching Procedure (TCLP) analysis. In addition, the shallow groundwater beneath the sand blast media deposition area indicated arsenic and lead at levels exceeding EPD HSRA standards.

9. Enforcement or Other Actions
ECBOC affirms there are no enforcement actions known or anticipated for the Shady Oaks property and no inquiries, or orders from federal, state or local government entities that the ECBOC is aware of regarding the responsibility of any party for the hazardous substances at the property. There are no environmental liens on the property.

10. Sites Requiring a Property-Specific Determination
ECBOC affirms that the targeted Shady Oaks property is NOT any of the following:

- properties subject to planned or ongoing removal actions under CERCLA;
- properties with facilities that have been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under 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 (SDWA);
- properties with facilities subject to RCRA corrective action (§ 3004(u) or § 3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation;
- properties that are land disposal units that have submitted a RCRA closure notification or that are;
- properties where there has been a release of polychlorinated biphenyls (PCBs) and all, or part, of the property is subject to TSCA remediation; and
- properties that include facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund (see the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k) for a definition of LUST Trust Fund sites).

11. Threshold Criteria Related to CERCLA/Petroleum Liability
   a. Property Ownership Eligibility – Hazardous Substance Sites
      Effingham County is eligible for a Brownfields Grant to address hazardous substances at the subject property located at 216 Shady Oaks Drive, in the Eden Community. We are exempt from CERCLA liability, the property is publicly owned and was acquired prior to January 11, 2002, and, meets the requirements for asserting an affirmative defense to CERCLA liability through one of the landowner liability protections (e.g., the bona fide prospective purchaser liability protection per CERCLA 101 (40)).

   iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY
      (1) Bona Fide Prospective Purchaser Liability Protection
      ECBOC acquired the property after January 11, 2002 and is asserting the BFPP liability protection and demonstrates that we comply with all the requirements listed below:
      - Acquired the property October 23, 2020;
      - Conducted all appropriate inquiries (AAI) prior to acquiring the property. A Phase I Environmental Site Assessment using the ASTM E1527-13 was completed with one
year prior to the date the property was acquired, and an updated report was completed within six months of property acquisition;

- ECBOC is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination;
- No known disposal of hazardous substance has occurred at the site;
- ECBOC has exercised appropriate care by taking reasonable steps to address release restricting access to the site;
- There are no land use restrictions or institutional controls associated with the site at this time;
- ECBOC has and will provide full cooperation, assistance, and access to authorized persons;
- ECBOC will comply with any CERCLA information request and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site; and
- ECBOC will not impede performance of a response action or natural resource restoration.

Demonstrate that the applicant meets the requirements for the BFPP CERCLA liability protection.

(a) **Information on the Property Acquisition**
ECBOC purchased the subject property on October 23, 2020;

(b) **Pre-Purchase Inquiry**
Conducted all appropriate inquiries (AAI) prior to acquiring the property. A Phase I Environmental Site Assessment using the ASTM E1527-13 was completed with one year prior to the date the property was acquired, and an updated report was completed within six months of property acquisition;

(c) **Timing and/or Contribution Toward Hazardous Substances Disposal**
ECBOC conducted all appropriate inquiries (AAI) prior to acquiring the property. A Phase I Environmental Site Assessment using the ASTM E1527-13 was completed with one year prior to the date the property was acquired, and an updated report was completed within six months of property acquisition;

ECBOC affirms that it has not at any time arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) **Post-Acquisition Uses**
As of October 23, 2020, purchase date, and to the present time, the site remains vacant.

No one is currently using the site.

(e) **Continuing Obligations**
In order to control access and prevent potential exposure to hazardous and petroleum substances onsite, the site remain fenced and locked.

12. **Cleanup Authority and Oversight Structure**
   
   a. **Describe how you will oversee the cleanup at the site(s).**

   Based on the assessments performed at the subject property, additional testing and evaluation at the subject property will be performed, as necessary, in coordination with and input from EPD. ECBOC will work with EPD to formulate an appropriate corrective action approach to address such conditions.
ECBOC will work with its associates on the “List of Partners” spreadsheet in the Narrative Ranking Criteria. If additional expertise is needed we will procure an environmental consultant and will comply with the competitive procurement provisions of 2 CFR 200.317 through 200.326 to oversee the completion of the cleanup plan approved by EPA and remediation plan approved by GAEPD.

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

Cleanup activities will be completed on site and no off-site, adjacent or neighboring properties access will be required.

13. **Community Notification**

a. **Draft Analysis of Brownfield Cleanup Alternatives**

ECBOC provided the community with notice of its intent to apply for an EPA Brownfields Cleanup Grant and allowed the community an opportunity to comment on the draft grant application package, including the draft ABCA. Both documents were available for review at the public meeting held on November 12, 2021 and they both are available 8:30am – 5:00pm, Monday thru Friday at the ECBOC Administrative Complex located at 601 N. Laurel Street, Springfield GA, 31329.

b. **Community Notification Ad**

A public meeting notification was submitted for publication in the local newspaper, The Effingham Herald and it was published on November 10, 2021. The ad indicated the following:

- ECBOC’s intent of applying for Brownfields Cleanup grant funding for the site at the former Atlas San Mine
- date of a public meeting being held on November 12, 2021
- the availability of the draft application for public review at the ECBOC Administrative Complex located at 601 N. Laurel St, Springfield, GA, 31329

c. **Public Meeting**

A public meeting was held on November 12, 2021 at the ECBOC Administrative Complex in the community room located at 601 N. Laurel St, Springfield, GA 31329 to discuss the draft EPA Brownfields Cleanup application and draft ABCA for the former Atlas Sand Mine site.

d. **Submission of Community Notification Documents**

The following documents are provided as attachments as indicated below:

- Draft ABCA – Attachment B
- Public Meeting Notification Ad – Attachment C
- Public Meeting Sign In Sheet – Attachment D

14. **Statutory Cost Share**

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

ECBOC is requesting $500,000 of cleanup funding with a required 20% cost share which amounts to $100,000, with a total project cost of $600,000. The cost share will be from a non-federal source.

b. **Hardship waiver**

ECBOC is **NOT** requesting a hardship waiver.

15. **Waiver of the $500,00 Limit**

ECBOC is **NOT** requesting a hardship cost share waiver.
16. **Names Contractors and Subrecipients**

**Contractors** - ECBOC will advertise the project and go out for bid to seek qualified firms to assist in the management and remediation.

**Subrecipients** – No subrecipients are a part of this grant application.