

1. Applicant Information:
Volunteers of America Mid-States
570 S Fourth St Ste 100
Louisville, KY 40202

R04-24-C-007

2. Funding Requested:
a. Single Site Cleanup
b. Federal Funds Requested:
\$274,521

3. Location:
Stanford, Lincoln County, Kentucky

4. Property Information:
124 & 126 Portman Ave
Stanford, KY 40484

5. Contacts:

<p>Project Director: Nathan Fisher 606-404-5450 nathanf@voamid.org 48 Owens Rd Manchester, KY 40962</p>	<p>Chief Executive Officer: Jennifer Hancock 502-663-0771 jenniferh@voamid.org 570 S Fourth St Ste 100 Louisville, KY 40202</p>
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6. Population
3,640 (Source: <https://data.census.gov/all?q=Stanford+city,+Kentucky>)

7. Other Factors

Providing Information on Other Factors	Page #
Community Population is 10,000 or less.	1
The reuse of the proposed cleanup site will incorporate energy efficiency measures	3

8. Releasing Copies of Applications:
Not Applicable

1a. Target Area and Brownfields

I.a.i.: Volunteers of America Mid-States (VOAMid), a human service non-profit based in Kentucky, proposes a Brownfield Cleanup project in Stanford, Kentucky, the county seat of Lincoln County. VOAMid began exploring the recovery ecosystem in Lincoln in 2022, and quickly discovered that despite the region experiencing high rates of substance use disorder (SUD), including both maternal SUD and opioid use disorder, the existing treatment options were not comprehensive and existed in disjointed silos. The region has limited aftercare support, and any of the local resources available does not have the capacity to meet the current demand. The Appalachian Regional Commission designated Lincoln as “at-risk” in its most recent economic assessment of all 423 counties¹.

Demographic Statistics of Target Area:

	Lincoln²
Total Population	24,243 (3,640 in Stanford, Ky)
% of Population is White	95.5
% with Bachelor's Degree	13.7
Unemployment Rate³	4.8
Poverty Rate (2021)	19.3
Medium Income	\$45,856
Total Sq. Miles	332.84

The opioid epidemic continues to have a devastating impact on Kentuckians, despite concerted efforts and funding to address opioid use/substance use disorder. In 2022, Kentucky experienced a five percent decrease in overdose fatalities from 2021⁴, but the number is still a 62 percent increase over 2019. According to recent Center for Disease Control and Prevention data, fentanyl overdoses are one of the leading cause of death for American adults ages 18-45⁵.

¹¹ Appalachian Regional Commission. (2023). Classifying Economic Distress in Appalachian Counties. <https://www.arc.gov/distressed-designation-and-county-economic-status-classification-system/>

² U.S. Census Bureau *QuickFacts: Lincoln County, Kentucky*. (2021). U.S. Census Bureau. <https://www.census.gov/quickfacts/lincolncountykentucky>

³ Burnett, J. (2023, February 14). *County Unemployment Rates: Dec. 2022*. - The Kentucky Association of Counties. <https://www.kaco.org/articles/county-unemployment-rates-dec-2022/>

⁴ Kentucky Office of Drug Control Policy. 2022 Overdose Fatality Report. | 2023

⁵ AP News. (2022). Posts exaggerate adult fentanyl deaths in the U.S. <https://apnews.com/article/fact-check-leading-cause-deaths-fentanyl-154394187670>

Substance Use Disorder Impact in Lincoln

	Lincoln⁶
Age Adjusted Overdose Mortality Rate⁷	58.5
Fatal Overdoses in 2021	13
ED Visits Resulting in SUD Diagnosis (2021)	245

The grant funding requested will abate the hazardous materials identified in a brownfield in Stanford, providing the opportunity for VOAMid to construct a new family-focused treatment facility for clients with substance use disorder. Revitalizing the abandoned property within Stanford city limits will lead to economic development, increase the number of jobs in the community, and improve the overall health and wellness in the region.

I.a.ii.: The proposed brownfield site is two buildings located on 6.8 acres of land in Lincoln County; a 1960s single-story hospital with partial basement and a 1970s/1980s single story medical office with basement. Both structures are vacant and in poor condition. Until the 1960s, the site was farmland. The Fort Logan Hospital was built in 1960s and expanded in the 1980s. The Medical Office building was built in the late 1970s or early 1980s. The hospital remained active until approximately ten years ago and both structures have been vacant since. The buildings appear structurally sound from the outside, but the insides smell heavily of mold, have water damage, and are torn apart. Renovation of the existing structure is not feasible and the buildings must be demolished for the land to be reused.

The Phase 1 Environmental Survey Assessment identified two areas of concern. Three gasoline underground storage tanks (USTs) were installed on the property in 1968, 1977, and 1983. The Kentucky Energy and Environmental Cabinet’s USTs Branch issued letters signaling the clean closure of the 1977 and 1983 USTs, but there was potential that the 1968 75-gallon tank was never removed. As part of the sale of property agreement, the previous owner agreed to have the UST investigated and removed. The second finding was excessive mold, asbestos-containing materials (ACMs), polychlorinated biphenyls (PCBs) and Mercury items throughout both buildings. The subsequent asbestos report identified ACMs in the ceiling, floor, pipe joint compound, boiler exhaust insulation, vertical tank insulation, and horizontal tank insulation.

1b. Revitalization of the Target Area

I.b.i.: VOAMid’s revitalization plan for the remediated site is to build an SUD treatment facility with space for additional programs within our recovery ecosystem programming. VOAMid plans to expand its nationally recognized Freedom House program into Lincoln, transforming the way the community responds to and treats maternal substance use. Freedom House’s evidence-based

⁶ *Drug Overdose and Related Comorbidity County Profiles* | KIPRC. (2022). KIPRC. <https://kiprc.uky.edu/programs/overdose-data-action/county-profiles>

⁷ Steel, M., Mirzaian, M. (2022). Kentucky Resident Drug Overdose Deaths, 2017–2021. Kentucky Injury Prevention and Research Center.

programming breaks down the generational cycle of addiction, reunites families separated due to parental substance use, prevents and addresses Neonatal Abstinence Syndrome, addresses the trauma stemming from maternal substance use, and supports the mother's long-term sobriety. Since opening the first Freedom House in Louisville, Kentucky in 1993, VOAMid has welcomed 319 babies born free from illicit substances and annually cares for more than 300 women and all of their dependent children.

Freedom House is a national model for treating pregnant and parenting women and it is the only program in Kentucky that allows all dependent children to remain with mom while she receives treatment. The program's three phase approach keeps clients engaged for up to two years and addresses both substance use and its root causes. The current plan is to build a facility with 12 residential clinical treatment beds, 24 intensive outpatient beds, and five transitional housing apartments.

Local and state leaders requested VOAMid bring their award-winning program for pregnant and parenting women to Lincoln County after seeing the success of its rural iteration that opened in Clay County in 2020. The community lacked a specialized family-focused treatment option while simultaneously experiencing high rates of maternal substance use. As part of the proposal to bring VOAMid to Lincoln County, local leaders provided the old Fort Logan Hospital as a location that was sprawling, abandoned, and in need of revitalization. VOAMid created a steering committee in the community to help guide program development, and the public was able to comment on these proposed services through a town hall.

Alongside Freedom House, the proposed site will also host a Recovery Community Center, a Family Recovery Court program for CPS-involved cases due to parental substance use, and Recovery Reintegration Program for workforce development. The proposed site is not in a federally designated flood plain.

1.b.ii.: The cleanup and proposed reuse of the site will have measurable impact for the Stanford community, Lincoln County and surrounding counties, including creating 20+ new jobs, leveraging investment in the community, and generating state and federal funding. Freedom House graduates and Recovery Community Center participants, of which both programs will be housed at the revitalized site, are provided supportive services to help them gain employment or educational goals; safe, permanent housing; and long-term self-sufficiency, leading to an overall healthier community.

VOAMid has a proven track record of this type of revitalization in a rural community through recovery programming. Since opening the Recovery Community Center in Clay County, Ky in 2019, VOAMid has opened seven programs, created 43 new jobs, and invested \$25.8 million local, state, and federal dollars into the community. We anticipate a similar success story for Lincoln County through the new reuse of the site.

The proposed revitalization will improve local climate mitigation and resilience by including energy efficient systems that meet all state regulations, creating a gathering space for individuals in the community in recovery, and addressing the social and emotional well-being of some of the community's most vulnerable populations.

1c. Strategy for Leveraging Resources

1.c.i.: VOAMid began the due diligence process on the property in late 2022. Using organizational dollars, a Phase 1 Environmental Site Assessment was completed in January 2023, which identified a potential underground storage tank (UST) and other hazardous materials. An ASTM Document E2356-14 survey was completed on the hazardous material and attached to this application. The previous owner agreed as part of the sale of the property to handle the removal and mitigation of the UST. While not anticipated, there is a potential that hazardous materials were not identified in the E2356-14 in inaccessible interior building cavities, crawl spaces, etc. that may be found during demolition. VOAMid is prepared to seek additional grant funding or donor support if more abatement funding is needed.

1.c.ii.: The EPA funding requested in this application will be sufficient to complete the remediation of the proposed brownfield site.

1.c.iii.: The estimated cost to build a new Freedom House on proposed brownfield site is approximately \$6 million. This Freedom House construction is part of a larger expansion of the program model across Kentucky, with new programs in Lincoln County, Owensboro, Clay County, and Northern Kentucky. In September 2023, VOAMid launched a capital campaign for the expansions. To date for Lincoln County, \$1.6 million has been secured from the Kentucky General Assembly. Documentation of this is secured funding is attached. VOAMid anticipates applying to other state and federal funding, as well as local foundations, corporate gifts, and private donations to secure the remaining funding needed.

1.c.iv.: While not currently supplied to the property, the site does have access to electricity, natural gas, water, and sewer. Once mitigated, the building will be demolished and a new building will be built on the land. The rest of the property is asphalt parking and grass that will be reutilized. No infrastructure needs are key to the revitalization plans for the site.

2a. Community Need

2.a.i.: The proposed brownfield site has been vacant and deteriorating since the Ft. Logan Hospital relocated more than a decade ago. Prior to VOAMid's purchase of the buildings, the site was privately owned. The site is located within Stanford city limits, with easy access for Lincoln County residents, but due to the county's high poverty rate of 19.7 percent and high unemployment rate of five percent, the small county of less than 25,000 residents does not generate the tax and revenue dollars to purchase the property and address the environmental concerns. The city is even smaller, 3,640 residents, with a median household income of \$45,856. VOAMid, the lead applicant, is a 501c3 organization with limited access to unrestricted capital dollars that can be used to remediate the contaminated site.

2.a.ii.: The Climate and Economic Justice Screening Tool⁸ identifies Stanford and the specific census tract for the proposed site (census tract: 21137920102) as disadvantaged in two categories: Heart disease and Low income. Stanford is in the 90th percentile for people ages 18

⁸ Climate and Economic Justice Screening Tool. 2023. <https://screeningtool.geoplatform.gov/en/#10.39/37.5589/-84.6914>

and older who have been told they have heart disease, and in the 75th percentile for people in households where income is less than or equal to twice the federal poverty level.

(1) Health or Welfare of Sensitive Populations Sensitive populations in the target area include low-income individuals and pregnant women. Abatement of the hazardous materials in the proposed site will reduce any potential exposure for these vulnerable populations and create a new space for mothers with substance use to receive family-focused treatment, improving the overall health and welfare of the clients and their children.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions Within the target area, the community is in the 90th percentile⁹ in the nation for adults who have been told they have heart disease. Exposure to asbestos and other hazardous materials significantly increases the risk for adverse cardiovascular diseases. Substance use disorder as secondary disease for individuals with diseases often linked to hazardous materials (i.e. cancer or asthma) can have devastating impacts on an individual’s overall health and leave them at a higher risk of potentially life-threatening symptoms. The revitalization of the proposed site will create a recovery facility for clients with SUD. Graduates of the Freedom House program have improved mental and physical health.

(3.a.) Identification of Environmental Justice Issues Stanford is a low-income community with higher unemployment, lower medium income, and lower educational attainment when compared to the state. The vacant property is filled with hazardous material, including asbestos and lead paint and any abatement would remove a potential exposure source for an already vulnerable and disadvantaged community. According to CEJST, the proposed site is located within a disadvantaged census tract.

(3.b.) Advancing Environmental Justice The proposed site’s revitalization plans will transform it into a recovery ecosystem hub, providing family-focused recovery treatment, specialized recovery programming, recovery-focused workforce development, and a safe, sober environment for the community. The reuse will create and improve access to high quality jobs, transitional housing, and the social-emotional wellbeing of some of the community’s most vulnerable residents.

2b. Community Engagement

Name of organization/entity/group	Point of Contact (name + email)	Specific involvement in the project or assistance provided
Lincoln/Pulaski/Rockcastle Steering Committee	Natalie Pasquenza nataliep@voamid.org	VOAMid meets quarterly with this committee, comprised of local leaders, community-based organizations, faith-based organizations, philanthropists to share information and gather community feedback on VOAMid’s service expansion into the area.

⁹ EPA’s Environmental Justice Screening and Mapping Tool. 2023. <https://ejscreen.epa.gov/mapper/>

Department of Community-Based Services	Amy Spriggs Amy.Spriggs@ky.gov	DCBS assists VOAMid with service delivery in its family-focused recovery treatment programs.
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2.b.iii.: VOAMid publicly posted the draft Brownfield Cleanup Grant application, including draft Analysis of Brownfield Cleanup Alternatives on its website on October 30, 2023. On the same day, VOAMid placed a geofenced ad on Facebook targeting individuals located in Lincoln County. The ad, included as an attachment in this application, included information on how to access the application for review and comment, information on how to comment, and the date, time and location of the public meeting. The public meeting was held on November 6, 2023 via zoom. Members of the public were encouraged to drop in the link at any time to provide feedback on the proposed plan and ask any questions related to the cleanup. The public had no comments on the proposed plan or application.

3a. Proposed Cleanup Plan

The proposed cleanup plan for the targeted site is the removal and safe disposal of hazardous materials.

Contaminated material to be addressed: Asbestos was identified in both the hospital and the medical office building, including in the floor and ceiling, pipe joint compound, and throughout the boiler room. Asbestos content included both Amosite and Chrysotile. Additionally, lead, PCBs and mercury were all identified in the ASTM E2356-14.

Cleanup Methods: Prior to demolition, all ACM materials will be removed from the site, including 12,000 sq feet of ceiling tile, 100 pipe joints, 31,000 sq feet of floor tile, insulation, and boilers from the boiler room. Additionally, fluorescent lights with PCBs and mercury will be removed. During demolition, exposure assessments for Lead will be conducted to assure that all controls planned for the work are appropriate and will work properly, in line with OSHA standards.

Disposal Requirements: Asbestos products will be disposed of in a landfill does accept Category 1 nonfriable ACMs. PCB-containing light ballasts that are intact and not leaking will be placed in properly packed and sealed 55-gallon drums and disposed of at a solid waste landfill. Mercury lights will be recycled at location in Louisville or Cincinnati.

3b. Description of Tasks/Activities and Outputs

	Hospital Asbestos Removal	Medical Office Asbestos Removal	Lead Paint Removal during Demolition	Mercury/PCBs Removal
(3.b.i) Project Implementation, all will be EPA-funded activities	VOAMid will contract for asbestos removal. Regulated materials will be removed from the facilities prior to		Following OSHA regulations, during demolition, the contractor will conduct an exposure	PCB-containing light ballasts that are intact and are not leaking can be disposed in a

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	demolition. The contractor will confirm the landfill will accept Category 1 waste.	assessment to determine if any worker may have been exposed at or above the action level of 30 ug/m3 measured as an 8-hour TWA. The assessment will be completed in a timely manner to assure that all controls in place are appropriate for the project and will work properly.	municipal solid waste landfill in properly packed and sealed 55-gallon drums. PCB-containing ballasts that have been damaged and are leaking must be incinerated in an EPA-approved high temperature incinerator. Items with mercury will be recycled at an approved recycling location (closest being Louisville or Cincinnati)
(3.b.ii.) Anticipated Project Schedule	VOAMid will begin the contractor procurement process as soon as the grant award notification is received, and abatement is anticipated within the first year of the four-year EPA Brownfield Cleanup project period. Start Date: September 2024 End Date: September 2028		
(3.b.iii.) Task/Activity Lead	VOAMid's Director of Facilities and Planning will oversee all project activities, including supervising the contractor selected to abate the hazardous materials.		
(3.b.iv.) Outputs	Asbestos is removed and disposed of safely prior to building demolition. A cleanup report will be provided for the Ky Division for Air Quality.	The project will comply with OSHA Lead in Construction requirements and produce exposure assessments for any worker in demolition.	Fluorescent lights and mercury will be disposed of safely in the appropriate solid waste landfill, recycling, or EPA-approved high temperature incinerator.

Project oversight and grant administration will be supported via the 5% indirect costs.

3c. Cost Estimates

Budget Categories		Project Tasks (\$)				
		Hospital Asbestos Removal	Medical Office Asbestos Removal	Lead Paint Demolition	Disposal of PCBs and Mercury	Total
Direct Costs	Personnel					
	Fringe Benefits					
	Travel					
	Equipment					
	Supplies					
	Contractual					
	Construction	\$223,000	\$18,000	\$3,000	\$5,000	\$249,000
	Other (5% construction contingency)	\$11,150	\$900	\$150	\$5,000	\$12,450
Total Direct Costs		\$234,150	\$18,900	\$3,150	\$5,250	\$261,450
Indirect Costs (5%)		\$11,707	\$945	\$157	\$262	\$13,071
Total Budget		\$245,857	\$19,845	\$3,307	\$5,512	\$274,521

Summary of Asbestos-Containing Materials Costs:

ACM/Location	Estimated Quantity	Estimated Removal Cost
Hospital		
12" Ceiling Tile	12,000 Sq Ft	\$120,000
Pipe Joint Compound/Basement & Sterilizing Equipment Closets	100 joints	\$7,500
Floor tile & mastic / Throughout 1 st Floor	25,000 Sq Ft	\$75,000
Boiler Exhaust Insulation / Boiler Room	200 Sq Ft	\$2,000
Boiler Section Compound / Boiler Room	2 boilers (6' x 5' x 5' each)	\$15,000
Vertical Tank Insulation / Boiler Room	150 sq ft	\$2,000
Horizontal Tank Insulation / Boiler Room	150 Sq Ft	\$2,000
Medical Office Building		

12” Beige Floor Tile / Thought be under newer flooring throughout	6,000 Sq Ft	\$18,000
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3d. Plan to Measure and Evaluate Environmental Progress and Results

VOAMid maintains a rigorous agency-wide Performance and Quality Improvement (PQI) process as part of maintaining our accreditation through the Council on Accreditation. Outcomes are evaluated and service delivery is enhanced through this process. Through PQI, the project director will track outputs through an approved data collection plan to ensure the project is on track to meet the expected outcomes. PQI data is reported to VOAMid’s senior leadership and board of directors for quarterly review and recommendations for improvement.

The expected long-term outcomes for the project include a clean space for reuse; minimal exposure to hazardous materials in the demolition process; successful build of a Freedom House substance use treatment facility and space for programs in VOAMid’s recovery ecosystem; potentially 20+ new jobs created in the community; and millions of dollars generated for the community.

4a. Programmatic Capacity

4.a.i-4.a.ii: VOAMid operates under a hierarchical organizational structure with key personnel responsible for specific aspects of the project, including financial reporting, administrative supervision, and project management. The chart below outlines the specific staff involved, their roles, qualifications, and experience.

Key Staff	Role	Expertise	Qualifications	Experience
Nathan Fisher	Project Director: responsible for grant activities, overseeing the cleanup process	Nathan serves VOAMid as the Director of Facilities and Planning	Level III Certified Building Inspector/Plan Reviewer	Nathan has been with VOAMid since 2022. Prior to, he worked as an inspector for the State of Kentucky.
Becky Morris	Grant Administrator: overseeing compliance with reporting and grant expectations	Becky serves VOAMid as the Director of Grants	Becky has been a grant writer/administrator for five years.	Becky has worked with VOAMid since June 2021 and oversees the administration of \$22m in grants annually.
Nick Clifton	Financial: responsible for all financial	Nick serves VOAMid as the Controller	Nick is a CPA.	Nick has worked with VOAMid since August

	reporting and requirements		2022 and oversees the administration of the organization's \$52m annual budget.
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4.a.iii.: VOAMid will follow the approved agency policy and procedure for procurement, including a competitive bid process from three independent vendors where the anticipated cost of goods and services will exceed \$10,000 unless an existing vendor relationship is in place. Awards will be made to the vendor whose offer is most advantageous to the organization with price and other factors considered, allowing the agency to accept the lowest and best proposal. All federal funds received by the agency are administered in accordance with federal requirements, including but not limited to 2 CFR 200. VOAMid staff will verify via SAM.gov that any contractor has not been debarred or suspended.

VOAMid's staff is developing strong working relationships with local contractors in the Lincoln County community, as following the brownfield cleanup, the organization will be building a new facility from the ground up. All contractors for the cleanup will follow the Davis-Bacon Act for prevailing wages.

4b. Past Performance and Accomplishments

4.b.ii.: VOAMid has never received an EPA Brownfield grant but has received other federal and non-federal assistance agreements. Organization-wide, VOAMid manages approximately \$22 million in federal, state, and local grants annually. Similar in scope to this project are the two federally funded rehabilitation projects at VOAMid's family emergency shelter, Unity House, funded through American Rescue Plan (ARPA) and federal Earmark awards.

In the 2021 federal budget, VOAMid received a federal earmark for \$225,000 to provide much needed renovations to the Unity House kitchen. At a similar time, VOAMid received \$1,750,000 from Louisville Metro Government's ARPA allocation to renovate shelter rooms, offices, the exterior entrance ramp, install new windows and upgrade appliances. The ARPA project has completed the design phase with the architect and staff is working with the contractor to get budgetary numbers to determine the phased plan, with a priority on fire safety and replacing windows. Renovations are expected to begin in January and completed in time to celebrate Unity House's 40th anniversary in fall 2024. VOAMid staff meet with city leaders to discuss the renovations and ensure activity aligns with the terms and conditions outlined in the agreement. The project is on-track, on-budget and in compliance with all programmatic and financial reporting.

The federal earmark project in the Unity House kitchen is currently awaiting final signatures from HUD, but the budget has been approved and the same contractor will be retained. No reports have been made at this time.

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Threshold Criteria for Lincoln County Freedom House Cleanup

1. Applicant Eligibility

- a. Volunteers of America Mid-States (VOAMid), the applicant, is a 501c3 non-profit organization (EIN: 61-0480950). The IRS Tax Letter is attached.
- b. VOAMid is not a 501c4.

2. Previously Awarded Cleanup Grants

The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

VOAMid does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

VOAMid is the sole owner of the site and purchased the property on November 1, 2023.

5. Basic Site Information

The Lincoln County Freedom House Cleanup Site is located at 124 & 126 Portman Ave, Stanford, Kentucky 40484. The 6.8 acre site is congruent and outlined in the narrative as one Brownfield site.

6. Status and History of Contamination at the Site

- The proposed site is contaminated by hazardous materials that will need to be removed prior to demolition or renovation.
- Until the 1960s, the site was farmland. The Fort Logan Hospital was built in the late 1960s and expanded in the 1980s. The Medical Office building was built in the late 1970s or early 1980s. The hospital remained active until approximately ten years ago and both structures have been vacant since.
- The environmental concerns of the site include identified asbestos, lead, mercury, and PCBs that will need to be removed prior to demolition.
- All of the hazardous materials, including asbestos and lead paint, were common materials used in construction during the time the buildings were constructed. Multiple materials including floors, ceiling tiles, and insulation have identified hazardous materials.

7. Brownfield Site Definition

The proposed site is not listed or proposed for listing on the National Priorities List; 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 not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

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An ASTM E2356-14 Standard Practice for Comprehensive Building Asbestos Surveys was completed by Air Source Technology, Inc (ASTI). On January 4, 2023, Michael McGonigle and Matt Biven of ASTI conducted a site visit and sampling. The report identified hazardous materials that require special handling and disposal methods prior to demolition activities.

9. Site Characterization

Please see the attached letter for section c.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the site.

11. Sites Requiring a Property-Specific Determination

The proposed site does not need a Property-Specific Determination

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a.iii.1.a. VOAMid is a bona fide prospective purchaser. The property was a negotiated purchase from private individuals, purchased on November 1, 2023. VOAMid is the sole owner of the property. The parties that VOAMid acquired ownership from include: Owens Chevrolet, Inc.; Wade Hampton Owens III aka “Tre” Owens, the Administrator of the Estate of Tommy H. Owens aka Tom H. Owens; and Wade Hampton Owens and Victoria Brooke Owens. VOAMid has no prior familial, contractual, corporate, or financial relationships or affiliations with all prior owners or operators of the property.

a.iii.1.b. The Phase I Environmental Site Assessment (ASTM E 1527-21) was performed specifically for VOAMid as part of the due diligence before purchasing the property. It was conducted on January 4, 2023 by Steve Jones at Environmental Assessments, LLC, and updated on October 30, 2023. Jones has a Master of Science in Civil Engineering with over 30 years of experience working with civil and environmental engineering, geologists, and environmental scientists. He has performed over 1,500 environment site assessments. Jones served on the ASTM committee (E50.02) that wrote the Phase I ESA standard. He provided assistance in conjunction with the EPA on the new standard practice to comply with EPA’s “All Appropriate Inquiry” regulation mandated by Congress.

An Asbestos survey (ASTM E2356-14) was completed on January 4, 2023 by Air Source Technology, Inc. (ASTI). ASTI was contacted by Steve Jones to complete the survey.

a.iii.1.c. All disposal of hazardous substances at the site occurred before VOAMid acquired the property. VOAMid has not caused or contributed to any release of hazardous substances at the site. VOAMid has not arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

a.iii.1.d. Since purchasing the building in early November, the property has remained vacant. It is not currently used for anything.

a.iii.1.e. VOAMid has limited access to the site and the public is discouraged from trespassing on the property, though it is not known that there have been trespassers. The sheriff regularly visits the property to ensure this.

VOAMid is committed to comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; assist and cooperate with those performing cleanup and provide access to the property; comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

13. Cleanup Authority and Oversight Structure

- a. The cleanup will be overseen by VOAMid's Director of Facilities and Planning. VOAMid is not eligible to apply for the Kentucky Energy and Environmental Cleanup's voluntary response program.
- b. Access to neighboring properties is not required.

14. Community Notification

- a. A draft Analysis of Brownfield Cleanup Alternatives is included as an attachment.
- b. A community notification ad was published on October 30th across VOAMid's social media sites and boosted on Facebook to target individuals in Lincoln County. The notification was also shared on the City of Stanford Kentucky's pages. Photos of both the ad and the website with draft application and ABCA are included as an attachment.
- c. The public meeting was held on November 6, 2023 at 12:00 pm virtually. No comments or questions were received either prior to the meeting via email to info@voamid.org or by the public during the meeting. Meeting notes, including a list of attendees and a summary of the meeting, are included as an attachment.
- d. The comments or summary of comments received and VOAMid's response to those public comments are not attached as we did not receive any comments.

15. Contractors and Named Subrecipients

Not applicable



Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 406 01
Phone: (502) 564 -2150
Fax: 502-564 -4245

Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

November 8, 2023

Jennifer Hancock
President and CEO
Volunteers of America Mid-States
570 South Fourth Street, Suite 100
Louisville, Kentucky 40202

Re: FY24 EPA Brownfield Cleanup Grant Application

Dear Ms. Hancock:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of Volunteers of America Mid-States to address brownfield sites in your community. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to systematically address brownfields redevelopment.

Supporting documentation for your project, located at 124 & 126 Portman Avenue, Stanford, KY, indicates that the cleanup involves asbestos, lead based paint (LBP), and mercury & polychlorinated biphenyl (PCB) containing light ballasts. Based on a review of the hazardous materials survey, it appears that your site is fully characterized and ready for remediation.

Asbestos, LBP and PCB ballasts removed during remediation do not fall under the Division of Waste Management regulations. As such, your program does not qualify to enter Kentucky's Voluntary Environmental Cleanup Program.

Sincerely,

A handwritten signature in black ink that reads "Lynn True".

Lynn True
Brownfield Coordinator

Cc: Cliff Hall, Division of Waste Management
John Rogers, Division of Waste Management, Columbia Regional Office
Becky Morris, Volunteers of America Mid-States