R04-24-C-014

Narrative Information Sheet – City of Dunlap, Tennessee

1. **Applicant Identification:** The City of Dunlap, Tennessee as a local municipality, with an address of 15595 Rankin Avenue, Dunlap, Tennessee 37327 requests consideration of the following EPA Brownfield Cleanup Grant proposal.

2. **Funding Requested:**
   a. **Grant Type:** Single Site Cleanup
   b. **Federal Funds Requested:** $632,807

3. **Location:** City of Dunlap, Sequatchie County, Tennessee

4. **Property Information:** Former Victory Automotive: 320 Walnut Street and 15480 and 15522 Rankin Avenue, Dunlap, Tennessee 37327

5. **Contacts**
   a. **Project Director:** Ms. Yonna Hatfield, Office Manager, will serve as the Project Director for this proposal. Ms. Hatfield's contact information is as follows: Phone: (423) 949-2115, Email: yhatfield@cityofdunlap.com, mailing address: 15595 Rankin Avenue, Dunlap, Tennessee 37327
   b. **Highest Ranking Executive Official:** Mr. Clint Huth, the City of Dunlap's Mayor is the highest-ranking executive official. Mr. Huth's contact information is as follows: Phone: (423) 949-2115, Email: mayorhuth@cityofdunlap.com, mailing address: 15595 Rankin Avenue, Dunlap, Tennessee 37327

6. **Population:**
   a. City of Dunlap Population: 5,357 (2020 Decennial Census)

7. **Other Factors Checklist:**

Other Factors	**Page #**
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority site(s) is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The priority site(s) is adjacent to a body of water (i.e., the border of the priority 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).	NA
The priority site(s) is in a federally designated flood plain.	3

The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	NA
The reuse of the priority site(s) will incorporate energy efficiency measures.	NA
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2, 3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	NA

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

9. **Releasing Copies of Applications:**
   Not applicable; no portions of the application are confidential.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The City of Dunlap is located within the Sequatchie Valley of southeastern Tennessee, a low-lying area that is bordered to the north by the Cumberland Plateau and to the south by Walden Ridge. With an elevation reaching over 2,000 feet, the mountain ridge backdrop is one of the state's more picturesque regions. With a population of only 5,252 (American Community Census (ACS), 2021), the City is situated 30 miles north of Chattanooga and 112 miles southeast of Nashville. Founded in 1858, the City prospered during the industrial revolution as the rise of the steel industry increased the demand for coal and coke. Coal was mined nearby, converted into coke, and then transported to the nearby metropolis of Chattanooga. To support this economy, 268 beehive coke ovens were constructed in the early 1900's to meet the demand from regional iron and steel foundries. Still in existence today, the ovens have converted into the present-day Historic Dunlap Coke Ovens Park, has been placed on the National Register of Historic Places, and has become a popular cultural destination within the City.

The onset of the Great Depression devastated the local economy as the price of coal plummeted, subsequently forcing the closure of several mines. In the ensuing decades, Dunlap reinvented itself as a logistical corridor for commercial and manufacturing-based industrial businesses, capitalizing on its centralized location between Grundy, Van Buren, Marion, White, and Bledsoe Counties. Since the City's economy is so closely tied to the manufacturing sector, the City has experienced cyclical growth and decline over the past few decades.

The turbulent economy, changes in demographics, in conjunction with the fallout damage from severe flooding events over the past five years has prompted the City to devise new strategies to bolster sustained economic growth, and address critical infrastructure needs. Although the City has generally recovered from the effects of the last recession, the City's residents are still experiencing lingering hardships. The median household income in Dunlap is approximately 14% below that of Sequatchie County and over 30% below the State of Tennessee (ACS, 2021). According to EPA's Environmental Justice Screening Tool (EJSCREEN), 53% of the City's population is considered low income, which is 11% higher than Sequatchie County and 18% higher than the state. Furthermore, 28% of the population has not graduated high school (a result of reduced public funding for the local school system), which has created a reduced skilled workforce shortage that has further hindered the economic growth of the City. Lastly, the National Oceanic and Atmospheric Administration (NOAA) has reported a total of 18 significant flooding events that have occurred in Dunlap/Sequatchie County since 1998, resulting in an estimated $5,886,000 in property damage. Although the City has done an admirable job to address the challenges of climate change, the City has inadequate infrastructure funding to address areal flooding during sustained rain events, in addition to addressing the City's brownfield challenges.

Today, the City seeks to bolster its economy by rebranding itself as a scenic and cultural destination, capitalizing on annual events line the Bluegrass Festival that is held at the Dunlap Coke Ovens Park and the East Coast Hang Gliding Championships, as well as attractions including the Mount Airy Golf Course, the Savage Gulf State Natural Area and Prentice Cooper State Forest, both of which are located atop the Cumberland Plateau. The City has been proactive in applying for a variety of federal assistance opportunities, which included a Brownfield Assessment Grant of $300,000 that was awarded in FY 2021. Currently in progress, the City has assessed 13 properties of which 5 were identified to have recognized environmental conditions present. The majority of these sites are located along Rankin Avenue, Dunlap's major thoroughfare. For the purpose of this grant, the Target Area encompasses Rankin Avenue and a City block on either side. Boundaries for the Target Area include Church Street to the north, Coops Creek to the east and south, and Wagner Lane to the west. The Target Area measures approximately 0.5 miles long by 0.13 miles wide. According to the EPA's Climate and Economic Justice Screening Tool (CEJST), the Target Area is located with a disadvantaged Census Tract (47153060101). The Target Area is primarily comprised of single-story commercial businesses, which increase in density within the downtown core. Of the previously assessed properties, the Victory Automotive site has garnered redevelopment interest from the City, who plans to use the property to expand fire and rescue operations. Environmental investigations conducted on the site revealed contamination from Volatile Organic Compounds (VOCs) and Asbestos Containing Materials (ACMs). Redevelopment of the Victory Automotive site has become a major priority for the City, which has prompted this request of $500,000 from an EPA Cleanup Grant to eliminate the contamination that poses risk to the future occupants of the site, the adjacent community and the environment. The scope of work defined within this application has been thoroughly vetted and determined to be conducive to completing the project for the amount of funding being requested.

ii. Description of the Proposed Brownfield Site(s)

Constructed in 1952, Victory Automotive is situated on a three-parcel property of approximately 2.4 acres. Vacant since 2020, the red bricked building, consisting of 13,264 square feet features a partial second story and a two-bay garage area. A chain link fence, topped with barbed wire has been erected across the property to secure the site from trespassers. Coops Creek runs behind the property which places the property within the active flood zone (FEMA).

In December of 2021, the performed a Phase I Environmental Site Assessment (ESA) on the property. A Recognized Environmental Condition (REC) was identified relating to the prior operation of the service garage dating back to 1952. Contamination associated with the former service garage operations would have consisted of general hazardous substances and/or petroleum products. Operations at the site generally occurred before major environmental regulations and current waste management and disposal procedures, which may be a source of subsurface contamination.

To advance the site's redevelopment, the City purchased the property in January of 2022, following the appropriate due diligence. Additional assessments were performed through the City's FY 2022 Brownfield Assessment grant, which included an asbestos containing materials (ACM) survey and Phase II Environmental Site Assessment. The results of the ACM survey identified 7 different building materials containing friable asbestos, which included the following materials: window caulk, ceiling texture, duct tape on HVAC ducts, wall texture, spray applied ceiling glitter, gray linoleum, and joint compound. The Phase II ESA revealed contamination from VOCs that required further assessment to delineate the area of impact. The result of the assessments identified soil gas concentrations of Benzene that exceed current EPA Regional Screening Levels. Due to the associated health risk of contaminant exposure, cleanup must occur in order for the re-occupation of Victory Automotive.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

With community health and safety as a top priority for the cleanup and reuse of this brownfield, the City and project partners, including the Dunlap Volunteer Fire Department, have developed a revitalization plan. Plans and opportunity for input were reviewed within City Council meetings, allowing for the public to be informed and provide suggestions on the future use. As part of this revitalization planning process, the Fire Department plans to expand fire and rescue operations into the building to accommodate the needs resulting from steady population growth. A museum devoted to local history and firefighting will be located within the ground level of the building. The redevelopment strategy for the priority site is supported by the Southeast Tennessee Development (SETD) District's 2022-2027 Comprehensive Economic Development Strategy (CEDS). From the CEDS, the redevelopment at hand meets six goals: 1) ensure public officials and emergency personnel have proper training and equipment, 2) continue to collaborate to complete environmental assessment and clean-up of brownfields sites through the EPA's brownfields programs, 3) invest funding in infrastructure that will withstand any potential disaster risks, 4) work with local leaders on projects that promote civic engagement and community enrichment, 5) protect our buildings and structures, and 6) experiment with bold and creative ideas to rejuvenate downtowns and revitalize neighborhoods. The redeveloped Fire Department will provide additional space, better accommodating the rapid response to emergencies (Goal 1). Following cleanup efforts, the property will be appropriately graded and a bioswale will be installed to minimize the effects of flooding events, which currently threaten the site (Goals 2 and 3). The museum will provide an additional element of interest along Rankin Avenue, with which the community will be encouraged to interact with (Goal 4). Additionally, the greenspace south of the building will be converted into a pocket park, featuring seating, trash receptacles, permeable pavement, and a rain garden (Goal 4 and 3). Upon successful completion of the redevelopment, the previously abandoned historical building will be put back to use, thus activating the property and increasing local foot traffic (Goal 5 and 6). The pivotal property will encourage the redevelopment of neighboring commercial properties, which will overall improve the walkability, aiding in the rejuvenation of Rankin Avenue (Goal 6). The property is located within FEMA Flood Zone AE, or 100-year zone and the reuse as planned is permitted for this zone.

ii. Outcomes and Benefits of Reuse Strategy

Cleanup of the site will eliminate harmful contamination, place a vacant building back in productive use, facilitate the health and safety of Dunlap citizens through fire and rescue services provided, improve nearby property values, and help mitigate flooding hazards. The Volunteer Fire Department will provide lawn care maintenance, relieving the City of this expense. As mentioned in section 1bi, above, in conjunction with CEDS goal 6, Rankin Avenue's rejuvenation begins with Victory Automotive and continues with spin off renovations and redevelopments of the neighboring properties. The site is located within Census Tract's 47153060101 Opportunity Zone, which provides additional tax break incentives for redevelopment. In

conjunction with the RAISE grant funding, these improvements will work to increase pedestrian safety, job opportunities, local shopping, sales tax, overall community well-being, and will create a greenspace for community use. Additionally, grading, a rain garden, and permeable pavement will be incorporated into the development's greenspace redesign to assist in mitigating flooding events, a necessity given the property's proximity to Coop's Creek, location within a flood zone, and the City's history of flooding events. These design elements help preserve the building's integrity, improve climate resiliency, and meet CEDS goal 3.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Characterization

Site characterization has been completed for Victory Automotive, including a Phase I and II ESA, Supplemental Assessment, and ACM Survey. Leveraged EPA Assessment funds were used to conduct these assessments with the exception of the Phase I ESA.

ii. Resources Needed for Site Remediation

The City anticipates that EPA funding requested in this application will be sufficient to complete the cleanup of Victory Automotive. Cost estimates were prepared with input from an environmental professional with extensive experience in brownfields cleanup projects. These costs were presented in a draft version of an Analysis of Brownfields Cleanup Alternatives (ABCA) that was prepared just prior to the submission of this grant application.

iii. Resources Needed for Site Reuse

The following monetary funding sources are either committed or available to help guarantee successful completion of the project.

Source	Role
Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Transportation Grants Program	**Reuse:** The City of Dunlap was awarded $14.6 million in RAISE grant funds in 2022 to redevelop Rankin Avenue including the area of Victory Automotive. Funding will include improvements and additions, such as redesign right-of-way to include bicycle lanes and ADA-compliant pathways as well as vehicle lanes, stormwater runoff management, new curb and curb cuts, new network of pedestrian walks, crossing points, pedestrian bridges and amenities, and wireless broadband throughout the corridor.
U.S. Economic Development Administration (EDA): Wastewater Treatment Upgrades	**Reuse:** The EDA awarded the City $1.8 million in the fall of 2021 to provide upgrades and new equipment for the waste water treatment plant. Prior to funding, the aging infrastructure has impeded the City's growth of commercial, industrial, and residential development. The project was matched with $440,000 in local funds and is expected to create 160 jobs, retain 315 jobs, and generate $28.2 million in private investment. Furthermore, the project will alleviate wastewater discharges during heavy rain events, preventing the contamination of Coop's Creek and subsequent transfer of human waste onto the Victory Automotive site during flooding events.
National Association of Realtors: Placemaking Program	**Reuse:** This program will be utilized for grant funds up to $5,000 to create a new, outdoor public space at Victory Automotive's greenspace, which will increase community livability. Eligible activities include furniture, paint, signage, material, landscaping, site preparation, etc. The City has experience in securing these funds and will apply upon receipt of community input following remediation activities.

iv. Use of Existing Infrastructure

Existing infrastructure, including electricity, natural gas, water service, municipal sewer, and sidewalks are available at Victory Automotive. Additional site improvements will be made through leveraging mentioned in Section 1.c.iii., above. Grading, a rain garden, and permeable pavement will be utilized to mitigate flooding associated with stormwater runoff.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Beyond industry shifts which include coal's untimely collapse, closures of local mines and coke ovens, and out of business manufacturing plants, natural disasters have caused devastation for the local economy. Since 1998, there have been 18 events listed in Dunlap/Sequatchie County as flash flood, flood, or heavy rain events by the National Oceanic and Atmospheric Administration (NOAA). These events combined for an estimated $5.886 million in property damage. However, since 1978, the year FEMA started tracking payment statistics, Sequatchie County has received only $117,119 in federal disaster aid. Following these events, local utility workers and emergency personnel are forced to work overtime to restore order to the

City. In turn, the overworked City employees are constantly "fighting fires", rather than performing routine maintenance, a position that causes a delay in scheduled repairs. Deferred maintenance later results in costly repairs which thus require additional local funding to complete. In fact, for 2022, **City expenditures outpaced revenues by over $845,000**. As for citizen wealth, according to CEJST, Census Tract 47153060101 is within the 70th and 80th percentile nationwide for climate change, which includes expected agriculture loss rate (79th percentile), expected building loss rate (88th percentile), expected population loss rate (85th percentile), projected flood risk (87th percentile), projected wildfire risk (87th percentile), and low income (78th percentile). As for citizen wealth, based on 2021 demographics, the median per capita income of residents living within a half mile radius of the Target Area is **less than half the national average** ($37,522) at **only $18,318** (EPA's Environmental Justice Screening Tool (EJSCREEN); FRED Economic Data). Additionally, 54% of the population here is considered low-income, earning less than $29,160 annually (EJSCREEN). Furthermore, 7% of this population is unemployed, landing in the 71st percentile for both the state and national rankings (EJSCREEN). Therefore, expenditures toward environmental cleanups are not feasible due to these tightening budgets and limited resources.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Children, elderly, minorities, and low-income individuals have been identified as sensitive populations living near the priority site. Specifically, within a mile radius of the Target Area, 23% of the population is under the age of 18 and nearly 50% of all youth experience poverty (EJSCREEN). This poverty rate is 98.5% greater than the national average (ACS). Also living within this area is a large elderly population; 23% of residents are 65 years of age or older, falling in the nation's 78th percentile (EJSCREEN). Although Hispanic minorities make up only 8.3% of the population of Census Tract 47153060101, 100% of this group lives below the poverty line (ACS). Furthermore, the median household income is only $41,591, 50% less than the national average and 35.7% less than the state average (ACS). Due to income restrictions, 13% of the population is uninsured, a leading factor preventing healthcare access (County Health Rankings, 2023 (CHR)). Research from the Morgridge Center for Public Service at the University of Wisconsin found that factors limiting access to health information impact an individual's ability for a healthy life beginning in early childhood – indicating that social and economic factors that compromise health (as experienced by the target populations) often play a greater role in health outcomes than making decisions, such as diet and exercise, alone. Additionally, the Census Tract is above the 95th percentile for transportation barriers (average cost and time spent on transportation) (CEJST). This disparity, coupled with the fact that there are 5 times fewer primary care physicians in Sequatchie County than the national average, makes it extremely difficult for Dunlap residents to access necessary healthcare (CHR). Furthermore, the Census Tract is above the 76th percentile for a lack of indoor plumbing, causing undue difficulties in locating portable water (CEJST). Unsurprisingly, County residents experience poor or fair health 45% more often than the average U.S. citizen, dying prematurely 31% more often. Furthermore, the remote County has approximately 70% fewer social associations than the average U.S. County, a statistic which larger plays into individuals' sense of self-worth and belonging. Lacking these social bonds may contribute to the prevalent suicide rate, which is 30% greater than the national average. Redeveloping Victory Automobile into the Fire Department will bring about a greater sense of community and in conjunction with the RAISE Act funding, will provide greater access to equitable employment opportunities and improved health and wellbeing.

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

As childhood health is a good indicator for a community's general well-being, consider the March of Dimes 2022 Premature Birth Report Card graded the State of Tennessee as an "D-". The premature birth rate for the state is 11.3% and the infant mortality rate is 6.2 per 1,000 live births (March of Dimes). Compare the state's infant mortality rate to the national average of 5.4 to find a discrepancy of 13.8% (March of Dimes). Beyond infancy, Tennessee children have an asthma prevalence rate of 9.7, 30% greater than the national average (American Lung Association). Adults also experience asthma at an elevated rate of 10.9, falling within 77th U.S. percentile (EJSCREEN). Additionally, childhood asthma prevalence for minorities is 26% greater than white children (TN Department of Health, 2019). In fact, CEJST ranks Census Tract 47153060101 as within the upper quartile for all listed health factors, including asthma (75th percentile), diabetes (79th percentile), heart disease (84th percentile), and low life expectancy (76th percentile). Furthermore, Tennessee ranks nationally as the fifth leading state diagnosed with new bronchus and lung cancer, at a rate of 69.7 per 100,000 (State Cancer Profiles, 2016-2020). Between 2016 and 2020, Sequatchie County's incidence rate of lung cancer was up to 67.5/100,000 people (State Cancer Profiles). Friable asbestos located within Victory Automotive and other brownfields like it may be contributing to the high incident rates of cancer of bronchus and lung cancer as lung cancer is one of three major health effects

associated with asbestos exposure (NESHAP). Benzene, a VOC that is known to cause leukemia, a cancer of the red blood cells, is also found at dangerous levels within the building. According to the Agency for Toxic Substances and Disease Registry (ATSDR), Benzene ranks in the top 20 chemicals for production volume and is typically sourced from crude oil. Found in lubricants, detergents, and gasoline, the carcinogen affects the hematologic, immune, nervous, and female reproductive systems (EPA; ATSDR). Acute inhalation exposure of benzene may cause drowsiness, dizziness, headaches, as well as eye, skin, and respiratory tract irritation, and, at high levels, unconsciousness (EPA). Following prolonged exposure, typically in an occupational setting, Benzene may reduce numbers of red and white blood cells, which could result in leukemia (EPA).Victory Automotive is a health and safety hazard to residents, of which 653 people live within a half mile radius of the site. Furthermore, the site is **less than 50 feet from the nearest residential home**. The hazards identified at the brownfield site are a threat to human health through exposure to airborne particulates and inhalation. An environmental cleanup of Victory Automotive would reduce exposure of asbestos and benzene to sensitive populations, reducing the presence of lung cancer and asthma as well as leukemia for the target populations.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

As illustrated by the above statistics, sensitive populations within the disadvantaged Target Area are disproportionately impacted by health, welfare, and environmental outcomes across the board. The populations living within a half mile of Victory Automotive are among the most economically impoverished in Sequatchie County with large elderly (23%) and low income populations (54%), in particular, who are disproportionately affected by the brownfield property (EJSCREEN). High unemployment within this area (7%) has precipitated high poverty rates and low median incomes (EJSCREEN). Within the half mile radius of the priority site, the median per capita income is a staggering $18,318 (**more than 2 times less than the national average**) (EJSCREEN, ACS). Furthermore, **25.5% of all residents, 49.7% of children, and 100% of Hispanics/Latinos are living in poverty in Census Tract 106.03** (ACS). As a vast majority of Hispanics/Latinos only speak Spanish, the area ranks within the 54th percentile for linguistic isolation (CEJST). Furthermore, the Census Tract is designated as disadvantaged by EPA's Climate and Economic Justice Screening Tool (CEJST). As previously mentioned, a very high percentage (22%) of residents have not finished high school and the area is within the 78th percentile nationwide for low income (CEJST). These stark statistics illustrate the disproportion contamination sensitive populations are exposed to.

(b) Advancing Environmental Justice

This grant will assist the City in remediating environmental hazards located at Victory Automotive. The remediation will remove the existing health disparity the site brings in an underserved and disadvantaged community. No businesses nor residents will be displaced by the planned assessment and future reuse plans for the priority sites, as they're all currently vacant. To minimize the potential for unintended displacement, the City will work with our local governments and community-based organizations such as the TN Department of Labor & Workforce Development to incorporate strategies through planning and visioning that preserve affordable housing and small business opportunities in the Target Area. Such efforts will include providing ample notice for any necessary relocation, providing relocation costs, and assisting businesses/residents in identifying alternative locations that are of similar or better circumstances.

b. Community Engagement

i. and ii. Project Involvement and Project Roles

A table for organizations that are willing to provide commitment to this grant is provided below.

Organization and Contact	Role & Commitments
Dunlap Volunteer Fire Department Norman D. Hatfield, Fire Chief (423) 949-2115	As the future occupant of Victory Automotive, the Dunlap Fire Department is committed to redeveloping the property. To aid in redevelopment, the Fire Department will assist in community outreach, distributing informational pamphlets regarding grant activities. Additionally, the group will be involved in all public meetings to provide input on upcoming decisions for cleanup activities, schedule, and future reuse.
The Sequatchie Valley Historical Association Carson Camp (423) 949-2156	Formed in 1984, the Sequatchie Valley Historical Association is a nonprofit that is dedicated to preserving the Sequatchie Valley's history and cultural resources. The Association manages Dunlap's Coke Oven Museum, which is listed on the National Register of Historic Places and hosts the Coke Ovens Bluegrass Festival in June each year. In order to spread awareness of the cleanup grant and Fire Hall redevelopment, the Association will present relevant information at the Bluegrass Festival. Additionally, the Association

	has pledged to assist in curating the museum portion of the Fire Hall as a means of further protecting and sharing the area's history.
The Dunlap Mercantile Becky Hatfield Card, Owner (423) 949-2552	The Dunlap Mercantile, located on Rankin Avenue, is the oldest building in town, built in 1894. As a Dunlap native, Ms. Card was called to relocated back to Dunlap to help revitalize downtown. The entrepreneur purchased the Mercantile in 2019 and completed the historic renovation in 2020. Since then, the Mercantile has served as the downtown's hub. Ms. Card seeks to provide general assistance as it relates to renovating the future Fire Hall and Museum. The Mercantile will also assist with disseminating project related information on their website.
Farmer Morgan Ben Farmer, Principal (615) 761-9002 bfarmer@farmermorgan.com	Farmer Morgan is an architectural design firm that has assisted the City in creating reuse plans for both Rankin Avenue and Coops Creek Greenway. As such, they have hosted charrettes, leading the public engagement. During these events, Farmer Morgan recorded and will later publish public input. Although not yet complete, Farmer Morgan will share renderings and proformas for Rankin Avenue's redevelopment.
Dunlap Church of God Brandon Gates, Pastor (423) 595-6506	With a congregation of approximately 800 people, Dunlap Church of God is located just south of Victory Automotive. The Church will aid with various aspects and phases of the project, including community engagement, public meetings, and providing input on upcoming decisions for future reuse.

iii. Incorporating Community Input

Following this grant's award, a project kick-off meeting will be held, which will be followed by routine public meetings to update on the cleanup and redevelopment status of the project. As a large population of Hispanic people live within Dunlap, communication and information will be provided in both English and Spanish. Meetings will be held in-person at the Dunlap Town Hall, to ensure close proximity to the Target Area's residents. Meetings will be held at hours agreeable to most schedules to ensure a high level of attendance and involvement. Additionally, those that cannot be present during the live meeting, can access the recorded meeting online, at the City's website and/or can utilize a call in number for the meeting. Meetings will provide a platform for public comment to provide concerns by local residents in regard to health, safety, and community disruption posed by the project. Commentary will be collected through comment cards and via email to the project manager so that affected parties' input can be captured and documented for use in decision making when selecting and prioritizing sites. Input will be considered during public meetings in an open manner that embraces the diversity of the community and focuses on a constructive, forward-looking vision for Dunlap.

Sensitive populations have already been identified as limited English speaking populations, children, minorities, and low-income residents living close to Victory Automotive. Cleanup will be conducted in a manner to protect these populations through ongoing air monitoring during abatement and demolition activities and ensuring that the site is secure and cannot be accessed by nearby residents. The volunteer fire department and residents of the target Census Tract are key stakeholders and have been proactively involved in the planning process of this grant and redevelopment concepts for Victor Automotive. All communication will be conducted in a variety of ways to ensure all stakeholders are involved in the planning and implementation of the project. This will include; progress updates at community meetings, press releases with the Dunlap Tribune (online and in print), announcements on the local news stations and the City's website, and updates at City Council meetings. Brownfield related announcements will also be distributed with fliers via local businesses and community organizations and the following Facebook pages will be used as well: "City of Dunlap Tennessee", "Dunlap Enquirer", and "Sequatchie County - Dunlap Chamber of Commerce", reaching over 20,000 followers.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The two proposed cleanup alternatives for the site were selected from a total of five remedial options presented in the draft ABCA dated November 2, 2023. The selected cleanup plan involves two phases: ACM abatement and vapor intrusion mitigation.

ACM Abatement: The first phase of cleanup involves abating ACMs in accordance with TDEC regulations and the EPA's Asbestos Hazardous Emergency Response Act (AHERA), followed by proper disposal of the hazardous material debris in a landfill that meets minimum standards under the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines. The complete abatement and removal of ACM will eliminate or adequately mitigate the future human health risk. This phase requires all contractors exposed to the ACM to be licensed abatement firms as regulated by TDEC.

The physical removal of the ACM is very effective since it completely removes the hazards for the long term, eliminating the potential for human exposure. This cleanup will eliminate health and safety hazards associated with blighted buildings located in close proximity to inhabited homes and operating businesses. Sensitive populations in the vicinity of the site have already been identified as children, minority, and low-income residents. ACM abatement will be conducted in a manner to protect these populations through ongoing air monitoring during abatement activities and ensuring that the site is secure and cannot be accessed by nearby residents or other passers-by.

Vapor Intrusion Mitigation: The second phase of cleanup includes the installation of a passive vapor intrusion mitigation system (VIMS) with activation potential. The VIMS will be installed in accordance with the TDEC Vapor Mitigation Guidance for Sites Enrolled in the Brownfields Projects Voluntary Cleanup Oversight and Assistance Program (TDEC VI Guidance) Sections 5.0, *Vapor Intrusion Mitigation*, and 6.0, *Post Vapor Intrusion Mitigation System Installation Considerations.* Based on the calculated risk values for residential and modified commercial receptors exceeding applicable TDEC criteria, a minimum of a passive VIMS is required for the main site building.

The passive VIMS will include the installation of a chemically resistant vapor barrier composite system above the existing slab with a protective cap slab installed above the barrier. Sub-slab venting will be installed to provide an extra layer of protection by creating a preferential pathway for impacted soil gas that accumulates beneath the slab, effectively preventing volatile organic vapors from entering the breathing zone of the main site building. The passive system will not require the use of electrical components to operate, thus making continuing obligations and operation and maintenance costs negligible, and significantly reducing opportunities for system failure. Although a passive VIMS is proposed, pilot and transmissivity testing will be conducted ahead of installation to ensure that the system is designed with the potential to be activated in the future if post-installation indoor air verification sampling indicates unacceptable levels of volatile contaminants in the building, or if there are future regulatory/risk assessment developments that indicate the need for active mitigation.

A passive vapor intrusion mitigation system, installed in accordance with applicable regulations, will eliminate or adequately mitigate the human health risk associated with vapor intrusion for future occupants.

b. Description of Tasks and Outputs

Task 1: Cooperative Agreement Oversight

i. Project Implementation:

- EPA-Funded Tasks: General grant management; develop Brownfield Advisory Committee (BAC); Qualified Environmental Consultant (QEC) selection based on a competitive bid process (per 40 CFR 30); meeting facilitation with the BAC, TDEC, and EPA; required reporting; budget reconciliation.
- Non-EPA Grant Resources Required: NA

ii. Schedule: Quarters 1-16: The BAC will be developed within 1 month of funding and meetings will be held at regular intervals throughout the project. A QEC will be selected within 1-2 months of funding. Quarterly reports will be submitted on a quarterly basis and MBE/WBE reports will be submitted annually. ACRES will be updated throughout the grant period.

iii. Task Lead: The City will oversee this task, with assistance from the BAC and selected QEC.

iv. Outputs: BAC creation and meetings, 1 Work Plan, 16 Quarterly Reports, 1 Close-Out Report, regular ACRES reporting, EPA Form 5700-52A for Minority and Women Business Entity Utilization, and Federal Financial Reports SF-425.

Task 2: Community Involvement and Outreach

i. Project Implementation:

- EPA-Funded Tasks: Develop marketing materials, which will be available online and in hard copy; notify the community of public information meetings and cleanup schedules; advertise for public meetings through online and in-person methods; hold public meetings to solicit input, inform, educate, and update the community regarding cleanup and redevelopment activities; provide updates as necessary at local development council meetings. The City will also attend various brownfield training conferences.
- Non-EPA Grant Resources Required: NA

ii. Schedule: Quarters 1-16: Community outreach will be performed for the duration of the grant period. The 1st public meeting (Kick-Off Meeting) will be held within 3 months of award; the 2nd public meeting will be held after the cleanup activities have been completed; and the 3rd public meeting will be held once redevelopment of the building is complete.

iii. Task Lead: City staff will oversee this task, with assistance from the BAC, TDEC, QEC, and community partners.

iv. Outputs: 1 Community Involvement Plan, public meeting advertisements; press releases and project update reports; educational materials to support public meetings (PowerPoint presentations and handouts); Kick-Off Meeting; 2-3 additional public meetings; attendance of various brownfield conferences, including two EPA Region 4 Conferences and the National Brownfield Training Conference.

Task 3: Cleanup Planning

i. Project Implementation:

- EPA-Funded Tasks: Meetings with the selected QEC, EPA, and TDEC; finalization of the ABCA; completion of a Quality Assurance Project Plan (QAPP); and QEC assistance in scoping the work. Scoping will include an ACM Management Plan, abatement design, engineered design of the VIMS, a bid package and pre-bid meeting with a site walkover. Design of a passive VIMS with activation potential will include professional engineering services, specification writing, regulatory interface, report preparation, computer-aided design (CAD) services, task management, the performance of a pilot test and/or other testing necessary to determine sub-slab transmissivity and design the system specifications, and the completion of multiple submittals to receive TDEC VOAP approval of the proposed system.
- Non-EPA Grant Resources Required: NA

ii. Anticipated Project Schedule: Quarters 2-4

iii. Task Lead: Cleanup planning will be a joint effort between Dunlap's grant manager and the selected QEC.

iv. Outputs: Outputs will include the bid package, project scope/bid, final ABCA, a QAPP, ACM Management Plan, abatement design, a VIMS design and construction plan, plan submittals associated with the TDEC VOAP, and will ensure compliance with the terms of the cooperative agreement.

Task 4: Cleanup Activities

i. Project Implementation:

- EPA-Funded Tasks: Abatement will include the removal and disposal of ACMs in ceiling and wall texture material, sheet vinyl material, window caulking, and HVAC duct tape; third-party oversight of ACM abatement; and clearance sampling (where appropriate). Vapor intrusion mitigation will include the installation of a spray-applied composite VIMS in accordance with design specs, including retrofitting the existing building with sub-slab venting (that can be activated, if necessary) and the installation of a cap slab, or other comparable TDEC-approved VIMS; vendor-certified third-party oversight of the VIMS installation; task oversight and field coordination related to VIMS installation; collection and analysis of indoor air samples related to post-installation verification sampling; and task management and report preparation related to the completion of four quarterly post-installation indoor air verification sampling events. Work will be performed per applicable state and Federal regulations, as outlined in the finalized ABCA.
- Non-EPA Grant Resources Required: NA

ii. Anticipated Project Schedule: Quarters 3-9

iii. Task Lead: Cleanup activities will be conducted by the selected QEC and subcontractors. The QEC will also conduct third party oversight, clearance, and verification sampling, TDEC VOAP reporting, close out reporting, and project management.

iv. Outputs: Outputs will include asbestos abatement and disposal, oversight air monitoring, VIMS installation, sub-slab vent installation, cap slab installation, VIMS installation oversight, indoor air verification sampling and associated TDEC VOAP reporting, and project management.

c. Cost Estimates

All task costs were determined appropriate through input from a qualified consultant and other applicable grant management experience, applicable cost per units is included below.

Task 1: Cooperative Agreement Oversight

- **Personnel**: 120 hours at a rate of $80/hour=$9,600 for programmatic expenses such as financial and performance reporting for the duration of the grant.
- **Supplies:** Office supplies will include copies, maps, and handouts. Estimated cost: = $900.
- **Contractual:** 120 hours at a rate of $100/hour=$12,000 to assist in programmatic and reporting needs for the duration of the grant.

Task 2: Community Involvement and Outreach

- **Personnel:** 75 hours at a rate of $80/hour=$6,000 for outreach coordination and meeting attendance.
- **Contractual:** 100 hours at an average rate of $100/hour=$10,000 to assist in information gathering for public presentations, and attendance at community engagement meetings.

- **Travel**: Estimating one staff member traveling for two national training conferences averaging three days each with $400 registration, $900/round trip flight, $200/hotel room per night (assuming 3 nights each), and $60/day per diem (totaling $4,160). Additionally, one staff member traveling for two local training conferences averaging three days each with $400 registration, $100 in gas for travel, $200/hotel room per night (assuming 3 nights each), and $60/day per diem (totaling $2,560) = $6,720

Task 3: Cleanup Planning

- **Contractual**: 150 hours at an average rate of $180/hour for professional engineering services, specification writing, and regulatory interface, and 50 hours at an average rate of $120/hour for report preparation, computer-aided design (CAD) services, and task management related to the design of a passive VIMS with activation potential (totaling $33,000); $15,000 for the performance of a pilot test and/or other testing necessary to determine sub-slab transmissivity and VIMS design; 200 hours at an average rate of $120/hour for report preparation and task management related to five submittals required to take the site through the TDEC VOAP and for completion of a Quality Assurance Project Plan (totaling $24,000) = $72,000

Task 4: Cleanup Activities

- **Contractual (ACM Abatement)**: $110,400 for subcontractor labor, materials, and expenses related to the removal and disposal of ACM identified in the on-site buildings; 40 hours at an average rate of $120/hour for third-party oversight and clearance sampling related to the ACM abatement (totaling $4,800); $1,131 for mileage (200 miles at $0.655/mile) and overnight per diem ($250/day for meals and hotel for 4 days) associated with the ACM abatement oversight; and 80 hours at an average rate of $120/hour for specification writing, task management, field oversight, and reporting associated with the ACM abatement (totaling $9,600) = $125,931
- **Contractual (Vapor Intrusion Mitigation)**: $351,570 for subcontractor labor, materials, and expenses related to the installation of a spray-applied composite VIMS that includes retrofitting the existing building with sub-slab venting (with activation potential) and the installation of a cap slab or other comparable TDEC-approved VIMS; 100 hours at an average rate of $120/hour for vendor-certified third-party oversight of the VIMS installation (totaling $12,000); $2,762 for mileage (400 miles at $0.655/mile) and overnight per diem ($250/day for meals and hotel for 10 days) for field work related to vendor-certified third-party oversight of the VIMS installation; 40 hours at an average rate of $120/hour for task oversight and field coordination related to VIMS installation (totaling $4,800); $6,000 in analytical costs for the collection of indoor air samples related to post-installation verification sampling (5 samples at $300/sample for four quarterly events, totaling 20 samples); 48 hours at an average rate of $100/hour for field work and 60 hours at an average rate of $120/hour for task management and the preparation of four reports related to the completion of quarterly post-installation indoor air sampling events (totaling $12,000); and $524 for mileage (800 miles at $0.655/mile) associated with the completion of four quarterly post-installation indoor air sampling events = $389,656

Budget Categories		Project Tasks				
		Task 1: Cooperative Agreement Oversight	Task 2: Community Involvement & Outreach	Task 3: Cleanup Planning	Task 4: Cleanup Activities	TOTAL
Direct Costs	Personnel	$ 9,600	$ 6,000	$ -	$ -	$ 15,600
	Fringe Benefits	$ -	$ -	$ -	$ -	$ -
	Travel	$ -	$ 6,720	$ -	$ -	$ 6,720
	Equipment	$ -	$ -	$ -	$ -	$ -
	Supplies	$ 900	$ -	$ -	$ -	$ 900
	Contractual	$ 12,000	$ 10,000	$ 72,000	$ -	$ 94,000
	Construction				$ 515,587	$ 515,587
Total Direct Costs		$ 22,500	$ 22,720	$ 72,000	$ 515,587	$ 632,807
Indirect Costs						
Total Budget (Direct + Indirect)		$ 22,500	$ 22,720	$ 72,000	$ 515,587	$ 632,807

d. Plan to Measure and Evaluate Environmental Progress and Results

Per the requirements of the EPA Assessment Grant, the City will submit quarterly reports to the EPA Project Officer. These reports will cover work progress and current status, as well as any difficulties that were encountered, a record of financial expenditures, data results, and anticipated further action. Quarterly reports will

also document information regarding a plan to resolve progress if the City ever finds itself off track financially or schedule-wise. The City will also complete reporting in the ACRES database for the cleanup site, noting specific accomplishments, amounts of hazardous materials (ACM) abated, VIMS design and installation details, indoor air verification sampling, and other resources that have been leveraged to complete the redevelopment of the site. The ACRES database will also be utilized to track job creation and acres of land assessed as part of this grant, the amount of funds expended by project, and increased tax revenue; essentially acting as a tool for both the EPA and the City to track and measure the grant's progress in achieving the outputs and eventual outcomes. At the end of the grant period, a final report similar to quarterly reports will be produced. Additional outcomes will include the cleanup of a contaminated property and the removal of blighted property conditions.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. and ii. Organizational Structure and Description of Key Staff

Ms. Yonna Hatfield, Dunlap's Executive Assistant, will serve as the point of contact and project manager for this grant. As such, the City will enter into a cooperative agreement with EPA to disperse grant funds and address all the financial requirements of the grant. Aside from directing the environmental consultant, she will serve as the main point of contact for the community. Through her 15 years of experience in this position, her daily interactions with City residents has fostered a unique understanding of the needs of the community which will be an asset to ensure the grant's success. In addition, Ms. Hatfield currently serves in similar capacities, including managing the FY21 EPA Assessment Grant. Ms. Hatfield will be assisted by Mr. Norman David Hatfield, the City Recorder and Treasurer. Mr. Hatfield has been with the City for over 20 years and has been responsible for preparing the annual operation budget, compliance of internal controls, and review of monthly financing. His understanding of the financials for the City along with his strong knowledge of this small, rural community will provide valuable insight into the use of assessment funds. Their combined experience will ensure correct and timely reporting, compliance, and grant completion within the 4-year window.

iii. Acquiring Additional Resources

The City's grant administrators have extensive experience managing grant funds and thus will begin the contractor procurement process immediately following Work Plan and Cooperative Agreement approval with the EPA. The desired consultant will be experienced in conducting various types of brownfield cleanup activities specific to those outlined within the cleanup plan, community outreach, and working with state regulators regarding solid waste. Additionally, the consultant will be expected to prepare the Generic Quality Assurance Project Plan (GQAPP) within the first 60 days of the grant so that proposed clean-up activities are not delayed. We will secure these services in accordance with the EPA's selection protocol and Dunlap's purchasing policies, which includes the publishing of a Request for Qualifications and/or reevaluation of our existing Master Service Agreement with our QEC. Following receipt of proposals, the City will review each application to select the most qualified candidate. The City's staff expertise, experience, and partnerships with the contracted QEC will ensure the timely and successful expenditure of funds and completion of all technical administrative and financial requirements of the project and grant.

b. Past Performance and Accomplishments

i. Previously Received an EPA Brownfields Grant

(1) Accomplishments

The City was awarded a 2021 EPA Assessment grant worth $300,000 that is currently underway. To date, 11 Phase I ESAs, 1 Phase II ESA, 1 Additional Vapor Intrusion Assessment, and 1 ABCA have been completed during the length of the grant. Each assessed site is accurately reported in the ACRES system, noting the particular outputs and outcomes for each site. Additionally, a Revitalization Plan for Rankin Avenue is currently underway which will include a multi-day charrette.

(2) Compliance with Grant Requirements

Dunlap's FY2021 EPA Assessment Grant is on track with all funds expected to be allocated by the fall of 2024. Required reporting as well as terms and conditions were met and will continue to be met on time, serving as an integral part of maintaining the grant's timely implementation. Required reporting included the completion of the Work Plan, General Quality Assurance Project Plan, ACRES updates, Minority-Owned Business Enterprises/Women-Owned Business Enterprises, regularly held meetings with EPA personnel to discuss project progress, quarterly reports, and a final closeout report. Because of current successful grant management, the City of Dunlap is better positioned to continue to pursue leveraging opportunities that support the community. Overall, the City's successful experience managing grants will ensure a timely and successful Cleanup Grant.

Threshold Criteria – City of Dunlap, Tennessee

1. **Applicant Eligibility:** The City of Dunlap, Tennessee, is a General-Purpose Unit of Local Government as defined under 2 CFR 200.64 and is an eligible entity.

2. **Previously Awarded Cleanup Grants:** 320 Walnut Street and 15522 and 15480 Rankin Avenue, Dunlap, Tennessee, the proposed site, has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds:** Not applicable.

4. **Site Ownership:** The City of Dunlap is the sole owner of the property located at 320 Walnut Street and 15522 and 15480 Rankin Avenue, Dunlap, Tennessee 37327. Property Assessor Tax Records are provided as an attachment to this application. The City acquired the site on January 6, 2022.

5. **Basic Site Information:**
   - **a.** Site Name: Former Victory Automotive
   - **b.** Site Address: 320 Walnut Street and 15522 and 15480 Rankin Avenue, Dunlap, Tennessee 37327

6. **Status and History of Contamination at the Site:**
   - **a.** The site is contaminated by hazardous substances.
   - **b.** Standard and other historical sources document that the property was first developed by at least 1936 and consisted of three residences and some associated agricultural land. An automotive service and dealership structure had been constructed on the northwestern portion of the subject property by 1952, when two of the residences on the subject property were razed. A residence located on the northeastern portion of the subject property had been razed by approximately 2008. The property was previously occupied by Victory Automotive Service Center, an automotive repair facility, and by a former automotive dealership that included a vehicle service and body shop operations, showroom, and a three-bay garage structure. By 2014, the subject property address was listed as Victory Preowned of Dunlap, a used car dealership. The facility closed in 2020.
   - **c.** ACM in the building is the result of the age of the building and historic use of ACM in building materials. The type and quantity of the materials is documented in the following table.

MATERIAL (TYPE)	FUNCTIONAL SPACE	QUANTITY
Window Caulk	Front Window Treatment	150 lnft
Ceiling Texture	Throughout Showroom	2,600 sqft
Duct Tape	Attic Detached HVAC Ducts	50 lnft
Wall Texture	2nd Floor Office Area	9,000 sqft
Spray Applied Ceiling (Glitter)	2nd Floor Right Front Corner and Right Bathroom	600 sqft
Gray Linoleum	2nd Floor Right Side Bathroom	30 sqft
Joint Compound	Throughout	Not Estimated

Lnft – linear feet
Sqft – square feet

   - **d.** Soil and groundwater analytical data of samples collected around the perimeter of the main on-site building, in conjunction with sub-slab soil gas survey results,

indicate that the volatile organic contaminant source is likely localized beneath the building slab.

e. A preliminary evaluation of soil gas survey results indicated that a vapor intrusion exposure risk may be present at the site. The sub-slab soil gas samples collected at the subject property indicate that target analytes are present beneath the building at concentrations exceeding the Vapor Intrusion Screening Levels (VISLs) for Residential Receptors. Further sampling confirmed the presence of sub-slab contaminants at concentrations likely to present a vapor intrusion condition at the main on-site building. Based on Tennessee Department of Environment and Conservation (TDEC) Voluntary Oversight Assistance Program (VOAP) Guidance, the results of the vapor intrusion risk evaluation indicate that mitigation risk value thresholds for a Residential scenario are exceeded and represent an unacceptable exposure risk to future building occupants. Additionally, it is noted that the proposed future use of the subject building is as a fire hall. Although workers would be present at the fire hall overnight, the default residential exposure scenario utilized in the EPA VISL Calculator (24 hours/day, 350 days/year, 26 years) is unlikely based on the proposed future use. As such, commercial worker exposure factors in the EPA VISL Calculator were adjusted to reflect an exposure scenario between that of a resident and typical commercial worker (8 hours/day, 250 days/year, 25 years). Based on the modified commercial exposure scenario, the calculated cumulative carcinogenic risk value for the site was still more than twice the mitigation risk value threshold noted in the TDEC VOAP Guidance.

7. Brownfields Site Definition:

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.

c. The property is not subject to the jurisdiction, custody, or control of the United States government.

8. Environmental Assessment Required for Cleanup Grant Proposals:

i. Previously Conducted Environmental Assessments: The following is a list of reports that are compliant with the ASTM E1903-19 standards (or equivalent).

Name of Report	Date of Report
Phase I Environmental Site Assessment (ESA)	12/02/2021
Report for the ACM and Lead Containing Paint Survey	10/17/2022
Phase II ESA	10/31/2022
Additional Vapor Intrusion Survey	09/20/2023
Analysis of Brownfield Cleanup Alternatives (Draft)	11/02/2023

9. Site Characterization:

The site is eligible to be enrolled in a voluntary response program. Attached is a letter from TDEC indicating that the information is for the FY24 Cleanup Grant application and includes the following information:

i. Affirms that the site is eligible to be enrolled in the TDEC VOAP

ii. Indicates the site owner intends to enroll the site in the TDEC VOAP

iii. Indicates that there is a sufficient level of site characterization from the environmental site assessment performed for the remediation work to begin on the site

10. **Enforcement or Other Actions:** There are no known, ongoing, or anticipated environmental enforcement or other actions related to this site.

11. **Sites Requiring a Property-Specific Determination:** A property-specific determination is not required.

12. **Threshold Criteria Related to CERCLA/Petroleum Liability:**
    a. **Property Ownership Eligibility – Hazardous Substance Sites:**
        iii. **Landowner Protections from CERCLA Liability**
            1. **Bona Fide Prospective Purchaser Liability Protection**
                a. The City acquired the property on January 6, 2022.
                b. The current owner completed a Phase I ESA on December 2, 2021, which is compliant of the ASTM E1527-13 standard practice and prior to acquiring the property.
                c. The current owner is not liable for the contamination at this site and is not affiliated with any other person potentially liable for the contamination.
                d. Disposal of hazardous substances at the site occurred before the City acquired the site.
                e. The current owner has exercised appropriate care by taking reasonable steps to address releases and preventing threatened future releases and exposures to hazardous substances at the site.
                f. Currently, there are no land use restrictions or institutional controls associated with the site.
                g. The owner will provide full cooperation, assistance, and access to the site to authorized persons.
                h. The owner will comply with any CERCLA information requests and administrative subpoenas and will provide all legally required notices with respect to the discovery or release of any previously unidentified hazardous substances at the site.
                i. The current owner will not impede the performance of a response action or nature resource restoration.

13. **Cleanup Authority and Oversight Structure:**
    a. The cleanup activities will be overseen by a qualified environmental consultant. The City of Dunlap will comply with oversight by the Tennessee Department of Environment and Conservation and EPA, and applicable notification, disposal, permitting and manifest documentation.
    b. The City will work with neighboring property owners to notify them of the work being done and provide contact information for questions to ensure understanding and compliance should the City need access to their properties.

14. **Community Notification:**
    a. Draft Analysis of Brownfield Cleanup Alternatives: A draft of the ABCA has been made available for review at the City of Dunlap offices. The local community was able to comment on the draft proposal and ABCA during a called public meeting on November 7, 2023. A copy of the draft ABCA is included as part of the application package.

b. **Community Notification Ad:** The City of Dunlap provided notification inviting public comment though newspaper media on October 26, 2023. The notification stated that a copy of the draft proposal and ABCA was available at the City offices. Accommodations were made to adhere to COVID-19 related protocols by employing a hybrid format with virtual meeting technologies (Zoom).
c. **Public Meeting:** A Public meeting was held on November 7, 2023.
d. **Submission of Community Notification Documents:** All requested documents are attached.

15. <u>Named Contractors and Subrecipients:</u> Not applicable.

TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF REMEDIATION
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 14TH FLOOR
NASHVILLE, TENNESSEE 37243

November 6, 2023

Clint Huth, Mayor
City of Dunlap Tennessee
15595 Rankin Avenue
Dunlap, TN 37327

Re: State Letter of Acknowledgement for the EPA 104(k) Brownfield Cleanup Grant Application

Mayor Huth,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge that the City of Dunlap plans to conduct the cleanup of a brownfield site and is applying for a FY24 EPA 104(k) Brownfields Cleanup Grant.

The City of Dunlap has developed an application requesting site-specific federal Brownfields Cleanup funding in the amount of $632,807 for the Former Victory Automotive site located at 320 Walnut Street and 15480 and 15522 Rankin Avenue in Dunlap, TN 37327.

The Tennesseee Department of Environment and Conservation affirms that the Former Victory Automotive site, referenced above:

i. Is eligible to be enrolled in the Tennessee Brownfields Voluntary Cleanup Oversight and Assistance Program (VOAP);
ii. Is not currently enrolled, but the City of Dunlap intends to enroll the site in the VOAP;
iii. Has had a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site. This site was assessed under the City of Dunlap's EPA 104(k) Community Wide Assessment Grant and has had the TDEC Division of Remediation Brownfields Program oversight.

For any questions regarding this letter, please contact Paula Middlebrooks at 615-532-0926.

Sincerely,

Paula Middlebrooks

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program