



R06-24-C-003

**EPA Brownfield Cleanup Grant
Narrative Information Sheet**

1. Applicant Identification:

City of Hamilton, Texas
200 E Main Street
Hamilton, Texas 76531

2. Funding Requested:

- (a) Grant Type: Single Site Cleanup
(b) Federal Funds Requested: \$500,000

3. Location:

- (a) City: Hamilton
(b) County: Hamilton County
(c) State: Texas

4. Property Information:

Grogan Street Nursing Home, 400 West Grogan Street, Hamilton, Texas, 76531

5. Contacts:

(a) Project Director:

Ryan Polster, City Administrator, 254.386.8116, adm@ci.hamilton.tx.us, 200 E Main Street, Hamilton, Texas 76531

(b) Chief Executive /Highest Ranking Elected Official:

Rodney Craddick, Mayor, 254-386-8166, [REDACTED], 200 E Main Street, Hamilton, Texas 76531

6. Population:

Hamilton- 2,895

Other Factors	Narrative Page #
Community population is 10,000 or less.	1
The applicant is or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
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 proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	N/A
The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures.	2
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.	N/A

8. Releasing Copies of Applications

Not Applicable- This application does not have confidential, privileged, or sensitive information.

Narrative/ Ranking Criteria

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

Hamilton was incorporated in 1911 and designated as the county seat of Hamilton County when the county was founded in 1858. By 1950 the population was just over three thousand and has remained so more or less to the present day. Sitting in the heart of the Texas Hill Country, Hamilton's economy and lifestyle is agriculture-centric. From cotton farming to attracting hundreds of hunters every year, the culture of this small town is rooted in the care and preservation of Texas land and animals. Droughts and overhunting have put negative pressure on locals who also must heavily rely on tourists and travelers who are driving to and from Austin, Texas.

The proposed Project is an asbestos-filled abandoned nursing home located in a residential neighborhood within Hamilton City limits, Census Tract 9503. The facility is located on the southwest side of the City of Hamilton and is adjacent to daycares and schools. Additionally, a Public Housing apartment complex is also located within one mile of the brownfield. The dilapidated building perpetuates the distress of the surrounding neighborhood and community. Asbestos-containing chrysotile has been found throughout the property, creating a potential public health hazard. The citizens of Hamilton are concerned for the health, welfare, and environmental impacts this property has on current and future generations if the property continues to be a blight in the community.

Economic growth has left an unintended wealth gap which is signified by the visual reminder seen in the abandoned nursing home. This grant will act as a catalyst for the cleanup and beautification of Hamilton, ensuring that all members of the community live in healthy and safe neighborhoods that are not dependent on economic status. Cleanup funding would allow the City to eliminate hazardous materials in the building that are currently harmful to the surrounding neighborhood, schools, and daycare facilities while establishing a path forward for reuse projects that will improve residents' quality of life and economic growth.

ii. Description of the Proposed Brownfield Site(s)

The site presents several environmental concerns that threaten the health and safety of the community. Due to the site's lack of use and dilapidated nature, a beehive was found in the building. The City paid for the bees to be professionally relocated. Two soil conservation service site reservoirs are within a half-mile radius of the site along with several commercial properties. The site is located outside of the 500-year and 100-year floodplains. Surface drainage at the site follows the surface topography to the northwest toward a Soil Conservation Service Reservoir. With the project site within proximity, there is a concern for water contamination. The site is not in a federally designated flood plain.

The proposed brownfield site is a former nursing home that has been abandoned and is located at 400 W. Grogan Street, Hamilton, Texas. On a large lot, the facility has a pier and beam foundation with brick walls consisting of five interconnected wings for a total of approximately 16,752 square feet. This includes one main meeting area and several connecting housing wards. The original building structure was built in approximately 1960. The property operated as a full-service nursing home until it was sold in 1997. Ownership continued to be passed on from non-profits to international stakeholders and eventually, the property was abandoned in 2008. The project site was managed by an international stakeholder who later failed to pay the property taxes and allowed the property to go into disrepair. The neighboring residents were left with a large and dangerous facility filled with asbestos and prone to break-ins. On October 14, 2021, the City of Hamilton as Trustee was granted 100% ownership. The property is largely overgrown and only gravel parking areas can be observed. Exterior walls are in disrepair and several portions of the roof are

missing. A gravel alleyway is located on the backside of the property and commercial structure. INTERA, under contract to provide services to the Texas Commission on Environmental Quality, performed an Assessment of Brownfields Cleanup Alternatives (ABCA) for the property. According to a Limited Asbestos Survey Report, the property facility contains the following asbestos-containing materials:

- The texture and joint compound on sheetrock walls and ceilings throughout the building have been determined to contain chrysotile in the texturizer and chrysotile in the joint compound.
- Vinyl floor tile with black mastic throughout the building has been determined to contain chrysotile in the floor tile and the black mastic adhesive.
- The linoleum floor covering in the kitchen has been determined to contain chrysotile.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The location and large size of the property make it a very extensive, unsafe, and visible blight for the small City. The cleanup of the abandoned nursing home will spark revitalization in Hamilton's rural, tight-knit community. In 2018, Hamilton released a comprehensive Planning and Capacity Study to cast a ten-year vision. In this plan, the public requested the demolition of the abandoned nursing home. This study laid a foundation for community engagement, and residents continue to be given the opportunity to help determine projects through public hearings, and online surveys, all published in a manner that low-to-moderate residents could see and give feedback.

The residents of the City of Hamilton have also expressed their interest in increasing recreational and public land. Hamilton's Comprehensive Plan includes land reuse strategies that will maximize contiguous open space to provide habitat for wildlife, enhance community spirit, and preserve the City's rural character. The proposed reuse plan will include native landscaping with well-draining soil to prevent substantial flooding, a butterfly garden to attract pollinators, an ADA-compliant sidewalk, and picnic areas with shade.

ii. Outcomes and Benefits of Reuse Strategy

The Brownfields Cleanup Grant will allow Hamilton to better serve disadvantaged populations by providing the funds to remove the asbestos and ultimately make space for a new community park. Hamilton's City Plan includes the beautification of the community, increasing public and recreational land use, and preserving the City's rural character by preserving open space. The brownfield cleanup project will be vital to reaching these goals as the current condition of the site challenges the community's ability to reuse the land. As the structure continues to deteriorate, asbestos-containing materials (ACM) will break down into dust-filled asbestos fibers that will carry in the wind and into the surrounding environment. This can have an adverse impact on people who live in the area, and the community's children who play and go to school near the building.

The reuse strategy has the potential to expand the tax base and benefit the surrounding population which is mainly low-income and elderly residents. According to the Centers for Disease Control and Prevention (CDC), parks and trails encourage physical activity which can reduce stress and provide safe places for neighbors to meet, improving community connections. The CDC also states, "Parks can provide environmental benefits as well, by reducing air and water pollution, protecting areas from inappropriate development, and mitigating heat islands". Low-income neighbors will feel included in the revitalization and growth of the community while every citizen will benefit from improved health and safety.

The grant will help to facilitate the cleanup of an asbestos-filled nursing home that sits on land that can be used for other purposes. The City of Hamilton, to fulfill its City Plan, wants to reuse the land to build a park, which will positively impact the surrounding area. This will increase

recreational and public land in the city, which currently only has a little over 100 acres of recreational land. This falls short of the recommended 1-acre-per-100-population standard for outdoor recreational areas from the American Planning Association. In addition to increasing recreational space, the proposed project has the potential to increase property values in the surrounding area, which is mainly low-income and elderly residents.

c. Strategy for Leveraging Resources

Andrew Portalatin from the EPA Region 6 office has been communicating with Ryan Polster, the Hamilton City Administrator regarding Technical Support. Andrew stated that Hamilton is one of two Texas communities that could receive Brownfield technical support for site characterization, remediation, and reuse.

i. Resources Needed for Site Characterization

The City of Hamilton has already worked with the Texas Commission on Environmental Quality (TCEQ) to complete an Analysis of Brownfield Cleanup Alternatives (ABCA) on the project site. The ABCA was completed in April 2022. TCEQ determined that the cleanup of the ACM for this site will not be under the jurisdiction of TCEQ and is not eligible for the TCEQ voluntary cleanup program. A data gap does exist regarding the presence of Lead Paint as that was not tested during the ABCA process.

ii. Resources Needed for Site Remediation

EPA Grant funds would be used to catalyze the revitalization of this property and community engagement by providing abatement costs. Hamilton Economic Development Corporation (HEDC) has already committed to providing additional financial support that may be needed to complete the cleanup project as well as any ineligible activities. Following the Alternative No. 4 method from the ABCA, the property will go through abatement. This was found to be the most ideal method of remediation after an analysis concluded no action, encapsulation, and enclosure were insufficient to meet the needs of the community. A third-party oversight will ensure that abatement specifications include and abide by all federal, state, and local requirements. A well-planned abatement design in accordance with all appropriate regulations, implemented by a licensed contractor and waste hauler, and with proper oversight and air monitoring by a licensed third party is feasible and would achieve the project goal. The City of Hamilton has procured GrantWorks to provide Project Management Services if the grant is awarded.

iii. Resources Needed for Site Reuse

The City will then seek further funding from the HEDC, Chamber of Commerce, and corporate donors to complete the reuse plan. Hamilton will seek sponsorship opportunities from several of the unique and thriving local corporations and industries. The City of Hamilton has committed to subsidizing some of the costs of the cleanup such as waste removal when appropriate.

Resources Needed for Site Characterization, Remediation, and Reuse

Name of Resource	Is the Resource for Assessment, Remediation, or Reuse Activities	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource
TCEQ	Assessment	Secured	ABCA Completed, Support Letter attached to Application
EPA Cleanup Grant	Remediation	Unsecured	Application Underway
Public/ Private Community Partners	Reuse	Unsecured	Additional Funding and Project Management

Hamilton Economic Development Corporation	Reuse	Secured	Financial support if needed
GrantWorks	Remediation	Secured	Project Management
EPA Region 6	Assessment, Remediation, Reuse	Unsecured	Technical Support

iv. Use of Existing Infrastructure

The proposed property is within city limits and is accessible to Hamilton's infrastructure including streets, sewer, water, and stormwater systems. The site is near Highway 281 and is within walking distance of several neighborhoods and schools. Hamilton Police Department and the Hamilton Volunteer Fire Department serve the area. While there is currently a broadband gap within the community, the City will seek federal funding opportunities that will increase accessibility.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Hamilton does not have the funding sources to carry out the cleanup without the assistance of this EPA grant. In 2016, Hamilton conducted a community-wide Texas Department of Agriculture (TDA) Community Development Block Grant (CDBG) house-to-house income survey that resulted in a Low to Moderate Income (LMI) rate of 82%. Twenty-seven percent of the population in Hamilton is below the age of 18. Veterans make up 11% of the population. According to the US Census Bureau, the poverty rate is 22.9%, with a median household income of \$40, 972. The community's overall low income, paired with a small population of fewer than 3,000 people, significantly reduces Hamilton's resources. Veterans and elderly citizens make up a significant portion of the population, and the clean-up and reuse of this project will provide the needed space to provide community services to these subgroups. Due to these economic conditions, it is unlikely that any member of the community would be capable of undertaking the necessary steps to both properly remediate the site and then develop/reuse the property. The property would also be challenging to sell in its current condition. The cleanup will enable the local funds, both public and private, to accomplish reuse activities.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: Sitting in a residential neighborhood, the building exposes several sensitive populations including children, veterans, and the elderly. The brownfield site contains hazardous asbestos, which is known to cause serious lung problems and cancer. In the Texas Education Agency (TEA) 2020-2021 School Report Card, **50% of the children enrolled in Hamilton Independent School District are classified as Economically Disadvantaged as defined by TEA.** The threat of children, adolescents as well as other vulnerable populations attempting and sometimes succeeding in breaking into the site, significantly increases the safety concern. The disturbing of asbestos-containing material releases particles and fibers into the air and thus exposes vulnerable populations. Proximity to schools, daycare centers, and a Public Housing apartment complex has resulted in this project being a top priority for the community of Hamilton.

(2) Greater Than Normal Incidences of Disease and Adverse Health Conditions: Both friable and non-friable asbestos are present within the structure located on the proposed clean-up site. Asbestos is known to contribute to respiratory diseases and ailments such as asthma, lung cancer, and asbestosis. According to the Texas Cancer Registry, Hamilton County has higher cancer mortality rates than the state average. The Climate and Economic Justice Screening Tool (CEJST) identifies Hamilton as disadvantaged in several categories including heart disease (96th percentile)

which is associated with low income and the lack of higher education enrollments. According to the tool, Hamilton has all three critical service gaps, which include broadband gaps, food deserts, and medically underserved areas. The low life expectancy index is within the 90-9th percentile for the community. Lead paint exposure is also in the high index for a portion of the city along with wastewater discharge falling within the 80-90th percentile.

(3)Environmental Justice:

(a) While the site is in a residential neighborhood, highly affecting nearby families, the property is adjacent to daycare and school facilities. These vulnerable populations are at risk of asbestos spreading from the proposed site. The building was purchased for renovation but due to the hazardous material in the building, the plan was abandoned, worsening the brownfield. With above-average low-income residents, veterans, and citizens over 65, this population is highly susceptible to environmental injustices. The commercial EPA's EJSCREEN Tool was used to evaluate the city of Hamilton and identified citizens who have limited broadband access, live in a food desert and are medically underserved. **These factors compound the limited resources found in rural communities.**

(b) The environmental benefits of removing the asbestos will have far-reaching and long-lasting effects on the people of Hamilton. Due to the unsafe nature of the brownfield, the cleanup will increase the safety of neighborhood children, the elderly, and other low-income neighboring residents. The proposed cleanup will also eliminate the risk of asbestos-related disease and cancer-causing agents while paving the path for a new park.

Hamilton's Cleanup project aligns with many of the EPA's goals, strategies, and objectives outlined in the EPA's strategic plan. Strategy 2 aims to consider the health of children at all life stages and other vulnerable populations, as well as objectives outlined in goals 4 and 6, are heavily reflected in the overall vision for this project—a vision rooted in protecting citizens and increasing recreational land use.

b. Community Engagement

i. & ii. Project Involvement & Roles

Hamilton has active community groups such as Helping Hands and Keep Hamilton Beautiful which work to improve the quality of life in Hamilton. Continued volunteer and financial support will be needed to preserve and enhance key community resources such as the City's parks and downtown area.

Name of organization/entity/group	Point of contact (name, email & phone)	Specific involvement in the project or assistance provided
City of Hamilton	Ryan Polster, City Administrator, 254-386-8116 x6, adm@ci.hamilton.tx.us	Provide general project oversight
Hamilton Economic and Community Development Corporation	Jared Cook, Board President	Financial support
Hamilton Helping Hands	Jim Keay, 254-661-0787, [REDACTED]	Community Liaison, Provide collective community input and volunteers for appropriate cleanup activities
Hamilton Chamber of Commerce	254-386-3216. hamiltonchmabertx@gmail.com	Provide community outreach support and business engagement

Hamilton Independent School District	Dr. Harper Stewart, hstewart@hamiltonisd.org	Supports the cleanup and can provide meeting space for future community meetings
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iii. Incorporating Community Input

On October 5, 2023, the local newspaper, *Hamilton Herald Newspaper*, published the City’s notice of a public hearing and called for public input for the Project Site. A special public meeting was held on October 12, 2023, to specifically discuss the cleanup project. Utilizing social media, online surveys, and newspaper ads helped the community gather information and interest for the reuse of the property. The City of Hamilton maintains a Facebook group with over 1,000 followers which can be utilized to gather public input and be used to communicate the project process. Utilizing social media along with community meetings will help with engagement while maintaining possible COVID-19 restrictions.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Incorporating Hamilton’s Planning and Capacity goals, the cleanup plan includes the abatement and reuse of the project site. A well-planned abatement design in accordance with all appropriate regulations, implemented by a licensed contractor and waste hauler, and with proper oversight and air monitoring by a licensed third party is feasible and would achieve the project goal.

Based on the findings of the Phase I ESA, INTERA recommended the following:

- Asbestos abatement in accordance with all appropriate regulations prior to disturbance or demolition at the Subject Property.
- Proper removal and disposal of de minimis conditions identified at the Subject Property including the bucket of oil and oily residue on the floor inside the main entrance, and the automotive battery located on the north side exterior of the facility.
- Complete inspection of the interior of the Subject Property for evidence of potential RECs prior to demolition of the Subject Property and inspection of the ground surface of the Subject Property subsequent to any demolition activity.

The ABCA document addresses the ACM and de minimis conditions identified as part of the scope of Phase I ESA. Additional findings that may be identified prior to or subsequent to any demolition or remedial activities are outside the scope of this ABCA. If the property owner decides to conduct the recycling and or disposal of the de minimis conditions prior to implementation of the selected cleanup alternative, the assessment in Section 4.0 regarding those items is no longer applicable.

The City will stay within the required 4-year cooperative agreement, starting in Fall 2024 and ending in Fall 2028, and follow all anticipated tasks and outputs.

b. Description of Tasks/Activities and Outputs

Task 1: Cooperative Agreement Oversight
<p>i. Project Implementation:</p> <p>EPA- Funded Task/Activities: The City of Hamilton has procured GrantWorks to provide project management services. These services include the management and execution of the cooperative agreement and other compliance activities.</p> <p>Non-EPA grant resources needed to carry out task/activities: Cooperative Agreement Oversight will be conducted by the City of Hamilton and will include, but is not limited to, general grant agreement, procurement, and oversight, ensuring reporting requirements are met, budget and invoice reconciliation, reporting and overall planning and coordination of cleanup activities.</p>

ii. Anticipated Project Schedule: Fall 2024 – Fall 2028
iii. Task/ Activity Lead: Ryan Polster, City Administrator, 254-386-8116 x6, adm@ci.hamilton.tx.us
iv. Outputs: Workplan; Quarterly, Annual, and Final Document Closeout Reporting; Monthly Funding Draws; Prepared/Reconciled and Submitted to EPA; Project Scopes of Work
Task 2: Community Engagement and Outreach
<p>i. Project Implementation</p> <p>EPA- Funded Task/Activities: GrantWorks will provide support for all community outreach activities such as preparing documents and public postings.</p> <p>Non-EPA grant resources needed to carry out tasks/activities: Conduct community engagement including public meetings to inform citizens on cleanup plans and implementation while providing opportunities for the community to provide feedback. Incorporate the completed community-wide site reuse survey into the community engagement plan. In accordance with Hamilton’s City Plan, the possible plan of reuse includes the construction of public park space.</p>
ii. Anticipated Project Schedule: Three public meetings will occur during key project stages. Fall 2024: Pre-Cleanup/Reuse Planning, Fall/Winter 2026: Site Cleanup Update, Fall/Winter 2028: Post Cleanup.
iii. Task/ Activity Lead: Ryan Polster, City Administrator, 254-386-8116 x6, adm@ci.hamilton.tx.us
iv. Outputs: Community Engagement Plan; Conduct Public Meetings; Updates to City Website and Social Media
Task 3: Cleanup Planning & Environmental Service Assessment
<p>i. Project Implementation:</p> <p>EPA- Funded Task/Activities: Cleanup planning will include steps outlined in the ABCA document, preparing Quality Assurance Project Plan for confirmation sampling, and negotiating and relieving the necessary regulatory approvals. Environmental Services and Cleanup specification documents written by a qualified professional who is hired through the public procurement process will be submitted to EPA for approval prior to obtaining bids from qualified cleanup contractors. Following the acceptance of these documents, the City will initiate a competitive selection process and contract with qualified cleanup contractors to implement the response activity.</p> <p>Non-EPA grant resources needed to carry out tasks/activities: None</p>
ii. Anticipated Project Schedule: Fall 2024-Fall 2028
iii. Task/ Activity Lead: Ryan Polster, City Administrator, 254-386-8116 x6, adm@ci.hamilton.tx.us

iv. Outputs: Quality Assurance Project Plan; NHPA/ Section 106 compliance; Technical specifications for site cleanup;
Task 4: Site Cleanup
i. Project Implementation: EPA- Funded Task/Activities: Work will be completed by a qualified contractor procured per all applicable local, state, and federal requirements. Cleanup activities include proper abatement and disposal of ACM. Non-EPA grant resources needed to carry out tasks/activities: None
ii. Anticipated Project Schedule: Fall 2026-Fall 2028
iii. Task/ Activity Lead: Ryan Polster, City Administrator, 254-386-8116 x6, adm@ci.hamilton.tx.us
iv. Outputs: Site cleanup; Cleanup monitoring; Post Removal Action Cleanup Report

c. Cost Estimates

An estimated cost for abatement services, based on the information available, was provided by E-Logic, Inc. Environmental Services (E-Logic), a Texas DSHS-licensed asbestos abatement contractor. E-Logic estimates \$450,000.00 to \$550,000.00 to conduct abatement of sheetrock walls, ceilings, and flooring throughout the facility. For this estimate, it was assumed that power and water were not available at the facility and would need to be provided.

An estimated cost for third-party compliance oversight of an asbestos abatement project that includes labor, equipment, laboratory analysis, and travel to Hamilton, Texas was provided by Caliche, Ltd. (Caliche), a Texas-licensed asbestos contractor. Caliche provided a daily oversight rate of \$1,105.00 which includes personnel, daily sampling, lodging, and per diem. Caliche also provided a lump sum cost of \$1,318.00 for the abatement design specifications, final report, and miscellaneous costs. Based on the estimated project duration, the estimated total cost would range from \$100,768.00 to \$111,818.00 for the scope of services. However, provided that the project could take four to five months to complete based on a standard five-day work week, this estimate does not include round-trip travel to the site for mobilization/demobilization or periodic personnel exchanges.

An estimated cost for removal and disposal of the de minimis condition items identified at the site was provided by Sunbelt Industrial Services (Sunbelt), at a lump sum cost of approximately \$3,230.56. The estimated total for the entire scope of work proposed under this alternative could cost \$579,250 including administrative fees.

Budget Categories		Project Tasks(\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel					\$0
	Fringe Benefits					\$0
	Travel					\$0

	Equipment					\$0
	Supplies					\$0
	Contractual					\$0
	Other	\$7,312.5	\$7,312.5	\$62,312.5	\$502,312.5	\$579,250
Total Direct Costs		\$7,312.5	\$7,312.5	\$62,312.5	\$502,312.5	\$579,250
Indirect Costs						
Total Federal Funding						\$500,000
Total Budget						\$579,250

d. Plan to Measure Environmental Progress and Results

The City of Hamilton will develop a detailed schedule and work plan for implementing planned outputs and outcomes for the site cleanup. A project manager will be assigned to the project and will review and evaluate the progress and implement any necessary corrective actions to keep the project on schedule. The project manager will work with EPA project directors for technical assistance. The City will utilize the ACRES Database to report, document, and track information and be in consistent contact with TCEQ, K-State TAB, and the EPA when technical support is needed.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

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

Hamilton has successfully secured, implemented, and completed several state and federally-funded community development projects. The current City Administrator, Ryan Polster has worked for the City of Hamilton for over 10 years in various capacities. Other key staff are the Executive Director of the Economic and Community Development Corporation and the Main Street Manager. Each of these key staff will work collaboratively to plan and implement the varying pieces of this site cleanup and reuse. Hamilton is a tight-knit rural community with a record of working together to complete large projects. Ultimately, the City Administration will be responsible for the execution and management of the project by hiring qualified contractors and administrators. Hamilton's extensive grant history assures timely and successful expenditure of funds to complete the brownfield project.

iii. Acquiring Additional Resources

Hamilton will work with other local government entities to secure the necessary financial resources for the project, such as the Hamilton Economic Development Corporations. Regularly contracting with engineering and consulting services, the project will be supported by organizations familiar with the area. The City will follow EPA's best practices and comply with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 as well as Texas procurement codes to hire qualified and experienced environmental professionals and grant administrators through a competitive selection process. This project does not anticipate utilizing sub-recipients.

The City of Hamilton procured GrantWorks to facilitate Project Management and Grant Administration.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

Not Applicable

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments: Hamilton has received several grants from the Texas Department of Agriculture (TDA) Community Development Block Grants (CDBG) dating back to 1990. Each grant was successfully executed, meeting the required benchmarks and closeout dates.

Hamilton Community Development Block Grant Awards							
State Contract Number	Grant Amount	Local Match Amount	Award Year	Project	Outputs/Outcomes	Beneficiaries	LMI* Beneficiaries
7219181	\$275,000	\$41,250	2020	Water System Improvements	Procurement of professional services; Environmental review; Construction/materials agreement procurement review; Special conditions review; Labor standards review; Fair housing and equal opportunity review; Acquisition of real property; Met all financial disbursement thresholds; Administratively closed within budget and on time	2,580	2,127
7218008	\$500,000	\$2,349,026	2019	Hospital Expansion	Same as above	2,580	2,127
7217180	\$275,000	\$31,625	2017	Sewer Improvements	Same as above	3,094	1,682

**Low-to-moderate income*

(2) Compliance with Grant Requirements

The City of Hamilton has complied with all work plans, schedules, terms and conditions, and other requirements under its current and previous grant agreements. The expected results were achieved and completed on schedule without the need for corrective measures. All reporting was completed on schedule and in accordance with grant requirements.

IV.F. Leveraging

The City of Hamilton will also continue to invest and support the cleanup of the project including subsidizing appropriate waste management costs such as roll-offs during the construction. HEDC has also discussed providing continued financial support for the site reuse. The City did utilize TCEQ to complete the ABCA and K-State TAB to develop this application. As stated above, contacts from the Region 6 EPA Office have reached out to the City of Hamilton regarding providing Technical Assistance for the Site.

Eligibility and Threshold Criteria Responses

1. Application Eligibility:

The City of Hamilton is eligible to apply for an EPA Brownfields Cleanup Grant as a General Purpose Unit of Local Government.

2. Previous Awarded Cleanup Grants:

Not Applicable

3. Expenditure of Existing Multipurpose Grant Funds:

Not Applicable

4. Site Ownership:

City of Hamilton as Trustee with 100% Ownership

5. Basic Site Information:

- A. Grogan Street Nursing Home
- B. 400 West Grogan Street, Hamilton, Texas, 76531

6. Status and History of Contamination at the Site:

A. Type of Contamination: The site is contaminated by asbestos which is a hazardous substance

B. Operational History and Current Use of Site: The Site is located in a residential neighborhood. Built as a nursing home in 1960, the facility operated until 1997. The property was then sold to a non-profit and later purchased by two different international investors. Abandoned in 1997, the city of Hamilton became the primary taxing entity on October 5, 2021.

C. Environmental concerns: The Site has documented ACM throughout the building. This ACM requires abatement prior to redevelopment in order to keep harmful material from spreading to the surrounding community; the facility is adjacent to daycares and schools. Drainage at the site follows the surface topography to the northwest toward a Soil Conservation Service Reservoir, creating a potential for water contamination.

D. How the site became contaminated and the extent of the contamination:

The nursing was built in 1960 when hazardous material was a common construction practice. The site is primarily contaminated with the following asbestos-containing materials:

- The texture and joint compound on sheetrock walls and ceilings throughout the building have been determined to contain 5% chrysotile in the texturizer and 5% chrysotile in the joint compound.
- Vinyl floor tile with black mastic throughout the building has been determined to contain 5% chrysotile in the floor tile and in the black mastic adhesive.
- The linoleum floor covering in the kitchen has been determined to contain 30% chrysotile.

7. Brownfields Site Definition

- The proposed site is a real property that the reuse is complicated by the presence of hazardous substances. This site is not listed or proposed for listing on the National Priorities List and is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decreed issues to or entered into parties under

CERCLA. The site is also not subject to the U.S. government's jurisdiction, custody, or control.

8. Environmental Assessment Required for Cleanup Grant Applications

An Assessment of Brownfields Cleanup Alternative (ABCA) was completed on the proposed site in April of 2022. A limited Asbestos Survey Report was completed in 2021 and included the nature, extent, and concentration of asbestos throughout the building.

9. Site Characterization:

According to TCEQ, the site is not eligible to be enrolled in a voluntary response program or equivalent oversight program. A letter from TCEQ is attached. An Environmental Professional has certified that there is a sufficient level of characterization from the environmental site assessment performed to date for the remediation work to begin on-site.

10. Enforcement or Other Actions:

There are no known ongoing or anticipated environmental enforcement actions, orders from federal, state, local government, or other actions related to the site.

11. Sites Requiring a Property-Specific Determination:

The site does not require a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

(1) Not Applicable

(2) Not Applicable

(3) The property was acquired on October 4, 2021, by the city and parties due to tax delinquency and/or abandonment. All hazardous materials were present on the property before the parties acquired the site. The City of Hamilton has not caused or contributed to any release of hazardous substances at the site. The City also has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

13. Cleanup Authority and Oversight Structure:

A. The City does not plan on enrolling the site into any Texas response programs. And will consult with the EPA to ensure the cleanup is protective of human health and the environment. In compliance with all procurement guidelines, the City will hire a qualified environmental professional and a qualified cleanup contractor to oversee the cleanup process.

B. The City has access to all areas of the site necessary for cleanup and does not anticipate impacting neighboring properties.

14. Community Notification:

A. Draft Analysis of Brownfields Cleanup Alternatives

The Texas Commission on Environmental Quality (TCEQ) contracted with INTERA to perform an Assessment of Brownfields Cleanup Alternatives (ABCA) in January 2022. The report was presented to the City of Hamilton and TCEQ on April 28, 2022. The ABCA was available for viewing again when a community notification ad was published on October 19, 2023.

B. Communication Notification Ad

The community notification ad ran in the Hamilton Herald newspaper on October 19, 2023.

C. Public Meeting

The City of Hamilton held a public hearing to discuss the EPA application and plans for the property. The notification for the public hearing ran on October 5, 2023, with the public hearing occurring on October 12, 2023.

D. Submission of Community Notification Documents

- A copy of the ABCA
- A copy of the newspaper for 14-day notice
- Meeting notes
- Meeting sign-in sheet

15. Contractors and Named Subrecipients

Hamilton will adhere to all procurement policies and will seek technical expertise and resources through the service of qualified EPA brownfield professionals. The City of Hamilton did hire GrantWorks to provide project management and administrative services and will execute the contract upon funding.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 10, 2023

Ryan Polster, City Administrator
City of Hamilton
200 E. Main Street
Hamilton, Texas 76531

Re: City of Hamilton Proposal for a U.S. Environmental Protection Agency FY24 Brownfields
Cleanup Grant

Dear Mr. Polster:

The Texas Commission on Environmental Quality (TCEQ) is pleased to offer this letter of support for the City of Hamilton's proposal for the U.S. Environmental Protection Agency FY24 Brownfields Cleanup Grant. The TCEQ Brownfields Program completed a Phase I Environmental Site Assessment and an Analysis of Brownfields Cleanup Alternatives (ABCA) for asbestos containing materials (ACM) for this site (TCEQ BSAG207 Former Nursing Home) and believes the work completed under the grant will significantly impact the enhancement of this community and supports the grant proposal. ACM is regulated under the Texas Department of State Health Services, therefore the cleanup of ACM for this site will not be under the jurisdiction of the TCEQ and is not eligible for the TCEQ Voluntary Cleanup Program (VCP). You may contact me at 512-239-2252 or Kristian.livingston@tceq.texas.gov if you have any questions or if you would like additional information.

Sincerely,

Kristy Livingston

Kristy Mauricio Livingston
Team Leader
Remediation Division

KML/dl