

Town of Kersey Grain Elevator, Kersey, Colorado  
FY 2024 US EPA Brownfield Cleanup Grant Application



R08-24-C-002

**US EPA Brownfield Cleanup Grant – Narrative Information Sheet**

**IV.D.1. Applicant Identification**

Town of Kersey  
446 1st Street  
P.O. Box 657  
Kersey, CO 80644

**IV.D.2. Funding Requested**

**IV.D.2.a. Grant Type**

Grant Type: Single Site Cleanup

**IV.D.2.b. Federal Funds Requested**

i. Funds Requested: \$1,132,899

**Federal Funds Requested**

**IV.D.3. Location**

- a) Town: Kersey
- b) County: Weld
- c) State: Colorado

**IV.D.4. Property Information**

Site Name: Town of Kersey Grain Elevator  
Address: 501 1st Street, Kersey, CO 80644  
Owner: Town of Kersey  
Date of Ownership: 06.15.2023

**IV.D.5. Contacts**

**IV.D.5.a. Project Director**

Name: Christian Morgan  
Ph: 970.353.1681  
E: CMorgan@Kerseygov.com  
Mailing Address: P.O. Box 657, Kersey, CO 80644

**IV.D.5.b. Chief Executive/Highest Ranking Elected Official**  
Name: Mayor Gary Lagrimanta  
Ph: 970.353.1681  
E: glagrimanta@kerseygov.com  
Mailing Address: P.O. Box 657, Kersey, CO 80644

**IV.D.6. Population**

The Town of Kersey has a population of 1,495 as of the 2020 US Census.

**Town of Kersey Grain Elevator, Kersey, Colorado  
FY 2024 US EPA Brownfield Cleanup Grant Application**

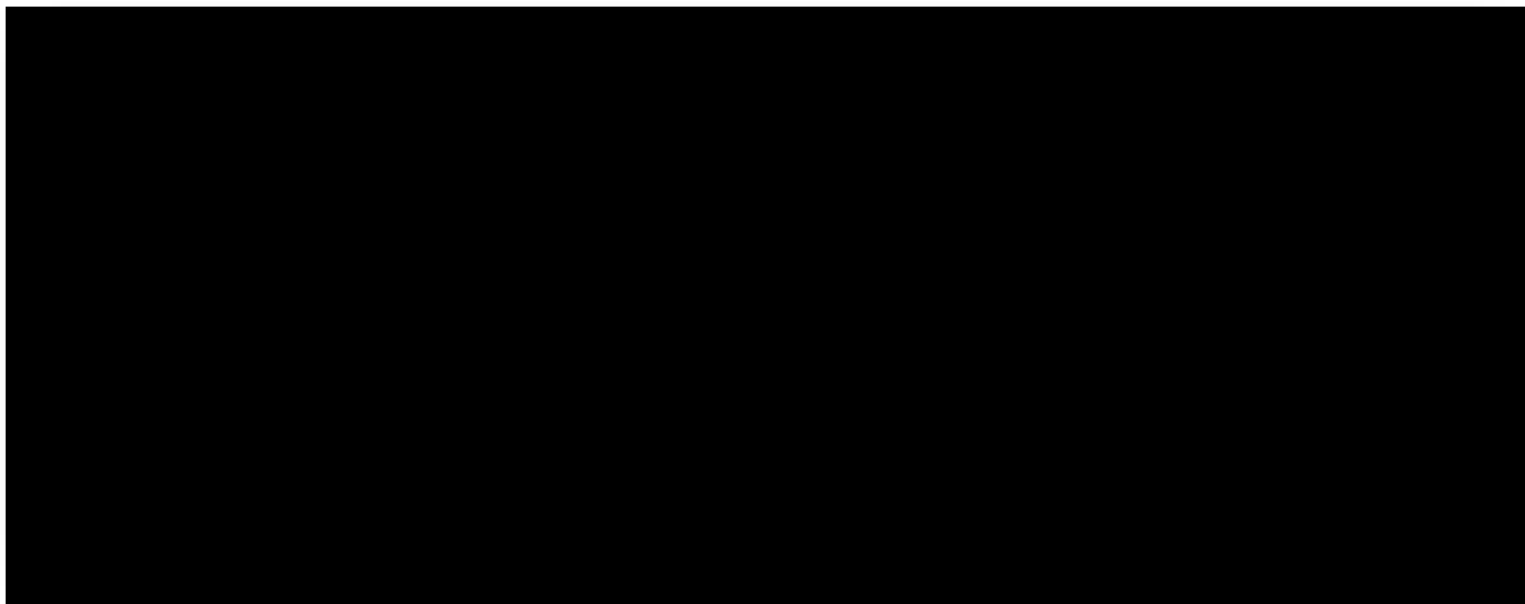


**IV.D.7. Other Factors**

Information on the 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.	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 project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	4
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 floodplain.	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.	4
The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures.	4
The target area(s) is located within a community which a coal-fired power plant has recently closed (2011 or later) or is closing.	N/A

**IV.D.8. Releasing Copies of Applications**

N/ A



## **IV.E.1 Project Area Description and Plans for Revitalization**

### **IV.E.1.a Target Area & Brownfields: IV.E.1.a.i Overview of Brownfield Challenges; Description of Target Area**

In the heart of downtown Kersey, a tight-knit agricultural community in northeastern Colorado, the deteriorating brownfield grain elevator stands as a stark reminder of the town's challenges.

In the past, the grain elevator symbolized Kersey's prosperity and vitality, reflecting the bustling days of the 1920s and 30s. Kersey flourished with a thriving array of businesses—a newspaper, butcher shop, bakery, drug store, bank, ice factory, hay mill, livery barn, harness, and shoe shop, and even a baseball park. It had two lively pool halls, one of which harbored a cigar factory in its rear, while the town buzzed with barbershops, lumber yards, dance halls, doctors, hotels, cafes, three grocery stores, and a stately two-story high school.

Unfortunately, Kersey's past vibrancy has given way to a starkly different reality. Of the 14 commercial buildings on the block adjacent to grain elevator, the only place people can spend money are at a beauty salon, a dried candy shop, a laundry mat, and an infrequently open pool hall. Essential institutions like the bank, newspaper, grocery stores, and thriving shops have faded into history. And the first thing people see entering town from the south are the remnants of the grain elevator—an unsightly and hazardous eyesore.

The Target Area and geographic boundary for this application is Kersey Town Limits. Kersey's population has dwindled from a peak of 1,508 in 2015 to 1,492 in 2021, even as Weld County's population skyrocketed by 216% during the same period. This decline highlights the urgent need for revitalization. Kersey's \$61,528 median household income falls significantly below Weld County's (\$80,843) and the State's (\$80,184). Alarmingly, 12.8% of our residents live below the poverty line, verses 9.7% in both Weld County and Colorado.

Kersey's brownfield grain elevator is a symbol of the town's struggles and the need for revitalization. The dilapidated building is blighted by pigeon guano, water damage, and asbestos contamination, posing a safety hazard, and preventing investment in the community. Kersey's designation as an Economic Opportunity Zone and this Brownfield grant offer a glimmer of hope. With the EPA's help, the town will transform the eyesore into a vibrant destination, converting a liability into a restaurant and brewery that attract new investment, creates jobs, and improves Kersey's economic, environmental, and climate resilience and quality of life.

#### **IV.E.1.a.ii Description of the Proposed Brownfield Site(s)**

The former Union Pacific Railroad Grain Elevator sits on a two-acre lot in downtown Kersey. It includes a grain elevator building with two metal grain bins, two silos, a metal garage, and a metal storage building, all now structurally unsound. Originally built in the early 1900's, it burned down twice and was most recently reconstructed in 1962. It served as a hub for grain processing and the sales of agricultural products until its closure in 2000, which caused an estimated 15-20 people to lose their jobs. The decaying, asbestos-laden eyesore sends a stark message of neglect, beckoning curious children like a magnet, harming property tax revenue, and deterring potential investors from opening new businesses in Kersey.

After three years of extensive negotiations with Union Pacific Railroad, the Town acquired the property in June 2023. Through a Colorado Department of Public Health and Environment (CDPHE) Brownfields Assessment grant, Partners Environmental completed a limited Phase 2 Environmental Assessment and Analysis of Brownfields Cleanup Alternatives. Prior to that, the Town obtained the following reports: Memorandum: Soil and Groundwater Screening Assessment, Kersey, CO – Parcel Screening (June 7, 2022, Jacobs); Asbestos Inspection and Sampling Report, 501 1st St., Kersey, CO, (May 26, 2023, Banyan Environmental); and Phase I Environmental Site Assessment, UPRR Grain Elevator, Trumbull Street & 1st Street, Kersey, Colorado (June 12, 2023, Paragon Consulting Group, Inc.).

The Phase 2 Assessment identified asbestos in about: 300 square feet (SF) of texture (on non-detect drywall), 2,000 SF of roofing tar, 120 SF of cementitious roof edge material, 13,500 SF of plaster material on the concrete silos, 768 SF plaster material on warehouse seams, and 800 SF of exterior black tar.

The Phase 2 stated that there are other areas that may include asbestos-containing materials (ACM) that were inaccessible or would require selective demolition to identify (i.e., behind covered walls or ceilings,

inside areas of ductwork or mechanical equipment) or within inaccessible areas (e.g., the flooded basement area). It also stated that the office south of the silo contains a significant amount of pigeon feces which must be removed and disinfected before the ACM can be removed in accordance with CDPHE Regulation 8.

#### **IV.E.1.b Revitalization of the Target Area: IV.E.1.b.i Reuse Strategy and Alignment with Revitalization Plans**

Kersey is steadfastly committed to revitalizing its downtown area and transforming the brownfield grain elevator site on 1st Street into a vibrant hub of activity, attracting people to eat, gather, shop, and restore lost jobs while bolstering our tax base. This vision aligns perfectly with our community's aspirations for a thriving town center along 1st Street, as articulated in *the 2018 Kersey Town Hall and Streetscape Plan*. The strategic location of the site on 1st Street makes it a crucial component of this revitalization plan.

The Town has made significant progress towards achieving our downtown revitalization goals, securing over \$3 million in grants and enterprise funding to relocate the Town Hall and Police Station to a new, centralized location directly across from the grain elevator. This transformed building now serves as a focal point and communal gathering space for downtown Kersey, fostering a sense of community and vitality. The redevelopment of the grain elevator site will further invigorate the area, spurring further reinvestment and propelling the town's revitalization efforts forward.

Kersey has developed comprehensive construction plans to make downtown 1<sup>st</sup> Street more accessible and appealing. To support these efforts, the Town obtained two Revitalizing Main Streets Small Multimodal and Economic Resiliency (RMS) grant totaling \$400,000. The RMS grant will fund the first of five phases of improvements this summer. In addition, we are actively pursuing funding from the Federal Emergency Management Agency to improve the overall drainage system, multimodal access, and streetscape throughout downtown as part of Kersey's *Hazard Mitigation Plan*. Hazards that Kersey is preparing for include tornados, fires, and high wind events, all of which could cause a release of the ACMs in these buildings, which would be a disaster for our community.

The Town is committed to implementing economic development activities to create quality employment opportunities for residents. Currently, most residents commute to Greeley for work; only seven percent work from home due to unreliable and slow internet service. To address these challenges, Kersey is collaborating with Colorado State University (CSU), NeoConnect, and Allo Communications to apply for a \$2 million Capital Projects Fund grant. This grant would provide Fiber to Premises connectivity to every residence and business in Kersey, aligning with the goal of connecting 99% of residents to high-speed internet to bolster economic opportunities and to create jobs.

Kersey residents overwhelmingly support the revitalization of downtown and repurpose of the grain elevator. The Town actively engaged the community (including students, seniors, and disabled residents) through a series of events in 2023:

- In June, we partnered with Downtown Colorado, Inc., UpState Colorado, and CSU Extension to host NoCO Regional Happy Hour. Locals and experts collaborated to generate ideas for strengthening Kersey's local economy, including repurposing the grain elevator to create jobs, attract investment, and revitalize downtown.
- In September, Farm-to-Spaceship facilitated a workshop to envision a Kersey that combats social isolation, income disparities, community disinvestment, and overall vibrancy. Citizens emphasized the importance of collaborating with property owners to invest in downtown properties, creating gathering spaces, infusing character into buildings (particularly the concrete and metal grain elevator), and improving design aesthetics to instill community pride and stimulate reinvestment.
- In October, Farm-to-Spaceship facilitated a Big Ideas Potluck where community members expressed their excitement about revitalizing and enhancing 1st Street. This included ideas for repurposing the grain elevator, such as transforming it into a brewery, restaurant, recreational space (like indoor skydiving and climbing walls), play areas, and a home for the museum.

The Kersey community is excited to move forward with our revitalization plans so that we may once again create a thriving community for all.

#### **IV.E.1.b.ii Outcomes and Benefits of Reuse Strategy**

By partnering with a developer to transform the derelict brownfield into a dynamic commercial hub with a restaurant and brewery, the Town aims to invigorate a long-neglected area; catalyze economic growth and serve as a beacon of sustainable development. The community has prioritized redeveloping this site for several important reasons:

- **Eliminate Safety Hazards and Promoting Environmental Equity and Inclusion:** Addressing the dangers of the decrepit site and creating a fully accessible commercial hub will ensure a safe and equitable environment for all residents, including those with disabilities.
- **Beautify the Downtown Entryway:** Converting the blighted property into an appealing landmark with responsible native landscaping and green space will dramatically transform our southern gateway to downtown and elevate the entire atmosphere, creating a welcoming space for residents and visitors alike.
- **Drive Economic Resilience:** Creating local jobs and amenities, increasing activity, and raising nearby property values will invigorate Kersey's economy and tax base and once again make downtown a destination.
- **Mitigate Health Risks:** Removing the pigeon feces which is known to harbor diseases such as histoplasmosis, cryptococcosis, and psittacosis, and the asbestos, a notorious carcinogen linked to lung cancer, mesothelioma, and asbestosis, will lessen environmental threats and safeguard resident health.
- **Improve climate adaptation and resilience:** Incorporating solar energy, green building practices and green spaces into the new restaurant, similar to our new Town Hall, will reduce emissions, provide a reliable source of energy, and support biodiversity.

#### **IV.E.1.c Strategy for Leveraging Resources**

##### **IV.E.1.c.i. Resources Needed for Site Characterization**

The grain elevator has been fully assessed. The Town has conducted: a Phase 1 Environmental Site Assessment, a Soil and Groundwater Screening Assessment, an Asbestos Inspection and Sampling Report, and a Limited Phase 2 Investigation which does not recommend any additional site characterization work.

##### **IV.E.1.c.ii. Resources Needed for Site Remediation**

The EPA Brownfields grant will fully fund all necessary remediation. In the event there is a cost overrun, we will seek cleanup funding through CDPHE's: Colorado Brownfields Tax Credit Program, 1306 Brownfields Cleanup Grant, and/or the brownfields revolving loan fund.

##### **IV.E.1.c.iii. Resources Needed for Site Reuse**

The Town invested substantial effort into purchasing this property from the Union Pacific Railroad and is trying to remediate the health and safety issues because we were unable to find anyone interested in redeveloping it due to the extensive remediation costs and the perceived liability associated with owning a brownfield property. Once the asbestos is removed, we will collaborate with UpState Colorado to issue a request for proposals to redevelop the property into a restaurant, consistent with the community's vision.

##### **IV.E.1.c.iv. Use of Existing Infrastructure**

The site is fully served by existing water, sewer, and electrical connections, a \$100,000+ value. The site also has excellent public access; with frontage on 1st Street and Trumbull Street. Additionally, the Town recently installed a \$150,000 trail connection and street trees in front of the property. The elevator is adjacent to the Town Hall/police station and the fire department is less than a mile away. Given this existing infrastructure, we do not anticipate the need for additional infrastructure, which will facilitate the timely and cost-effective implementation of our revitalization plans.

#### **IV.E.2 Community Need and Community Engagement (All data in narrative is from CDPHE Enviro Screen.)**

##### **IV.E.2.a Community Need & IV.E.2.a.i. The Community's Need for Funding**

This grant is essential to addressing the pressing needs of our small, low-income town. Kersey is economically disadvantaged in contrast to both Colorado and Weld County and we cannot do so without the EPA's help.

- **Higher poverty rates:** 12.2% of Kersey's population lives below the poverty level, compared to 9.9% of those living in Weld County and 9.7% of Coloradans, indicating our greater economic hardship. This is especially concerning because our poverty rate increased by 47% from 2020 to 2021. A higher percentage of our population also falls just above the poverty line (9.7% vs 6.6% Weld County and 6% CO).
- **Greater prevalence of disabilities:** 17.5% of Kersey residents have a disability, compared to 11.2% in Colorado and 11.0% in Weld County. Disabilities can make it difficult to obtain and maintain employment, which can lead to poverty. Notably, 54% of Kersey seniors (aged 65+) have a disability, compared to 29.8% of Colorado and 34.5% of Weld County seniors.
- **Higher rates of single-parent households:** 36.1% of Kersey households are headed by a female with no spouse or partner present, compared to 23.9% in Colorado and 19.4% in Weld County. Many of our single-parent households face economic challenges due to the difficulty of raising children on a single income.
- **Lower educational attainment:** Only 17.1% of individuals in Kersey have a bachelor's degree or higher, compared to 44.4% in Colorado and 31.7% in Weld County. This lower educational attainment can limit employment opportunities and earning potential for Kersey residents. Lower educational attainment can also lead to lower incomes, which can make it difficult to meet basic needs.
- **Lower property values:** Kersey's \$265,000 median property value is around half of Weld County's (\$475,000) and Colorado's (\$536,000). A key theme from the community input process is resident's strong desire to encourage landowners to care for their properties - the grain elevator is a prime example. Underutilized, poorly maintained buildings means lower property tax revenue for the Town, further limiting our financial resources for cleanup and redevelopment.

Despite these challenges, Kersey is creative and resilient. We convinced the UP Railroad to sell us this property for just \$5000. However, the cost of remediating it is prohibitive without grant funding. Without it, these issues will be deferred, burdening future generations to clean up this hazardous, blighted site.

#### **IV.E.2.a.ii. Threats to Sensitive Populations** (Note: All data from CDPHE EnviroScreen Tool.)

##### **IV.E.2.a.ii.1. Health or Welfare of Sensitive Populations**

Remediating and reusing the grain elevator site will significantly improve the health and welfare of Kersey's most vulnerable populations, our children, the disabled and seniors. The site is within a half mile of our schools (Platte Valley Elementary, Middle and High School), our library, our housing authority, and the majority of our community members. Our lowest-income residents live closest, with the Kersey mobile home park only .17 miles away.

The urgent need for remediation is underscored by the fact that the Town had to spend \$14,941 to remove the truck weighing scale on the property because it had become a hazardous attraction for children. Asbestos and pigeon guano must be eliminated before the site can be revitalized.

This redevelopment is not just about aesthetics; it is about creating job opportunities, providing income stability, revitalizing downtown, improving property values, adding green space, and stimulating investment in the area. Our community members are yearning for more places to gather, shop, connect and engage in meaningful activities. Redeveloping this site into a restaurant/brewery will be the catalyst for stronger social ties, more robust support networks, and improve the overall well-being of our town.

##### **IV.E.2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions**

Kersey has a higher-than-normal incidence of lead exposure risk (79.5% vs. 37.5 Weld County vs national rate of 51%), heart disease (71% vs 54% Weld County), and disability (61% vs 33% Weld County). This is likely due to a number of factors, including the age of our housing stock, proximity to oil and gas facilities and mining locations, and the fact that people with low incomes are more likely to have heart disease.

Kersey is in the 93% for proximity to oil and gas facilities, with 5,030 active oil and gas wells and 2,836 miles of directional pipeline within our growth management area. Weld County, where Kersey is located, produces over 88% of the state's oil production and 37% of its gas production.

Kersey is also in the 83% for proximity to mining locations, due to the number of gravel pits near town. Studies have shown that living near oil and gas facilities and mining locations can be associated with numerous health impacts, including respiratory problems, cardiovascular disease, and cancer.

Cleaning up the grain elevator, which may adversely affect our most vulnerable residents, and replacing it with commercial uses with green buildings and solar power will reduce greenhouse gas emissions, improve air quality, provide much-needed jobs, and bring life to our downtown.

**IV.E.2.a.ii.3. Environmental Justice**

The presence of an abandoned and contaminated landmark building in our small, low-income community illustrates the disproportionate environmental burden borne by low-income communities. The Target Area faces multiple challenges, including limited financial resources for remediation, outdated housing stock and infrastructure, high lead paint exposure rates, and an elevated prevalence of health issues. The asbestos and pigeon feces contamination at the grain elevator presents a significant health risk, particularly to our most vulnerable residents, such as children, the elderly, and those with respiratory ailments. The site is also a visual blight that diminishes property values and hinders investment opportunities.

- **Health risks:** Residents are exposed to asbestos and pigeon guano dust, which can cause a variety of respiratory problems, including cancer.
- **Reduced property values:** The contaminated site devalues property in the surrounding area and negatively impacts community pride.
- **Discouraged investment:** The contaminated site discourages businesses from investing in the community, which limits job opportunities and economic development.
- **Increased crime and reduced quality of life:** The abandoned and deteriorating site is a magnet for crime and vandalism and is a source of anxiety and stress for residents.

The presence of Kersey’s contaminated grain elevator site is a disproportionate environmental burden borne by our low-income community. Residents deserve to live in a safe, healthy environment and have access to economic opportunities and a high quality of life. **Remediating the grain elevator site and redeveloping it into a safe and productive use would help to address these environmental justice concerns.** It is a critical part of our vision to make downtown a destination for people to gather and shop, create jobs, improve property values, and boost the local economy.

**IV.E.2.b Community Engagement**

**IV.E.2.b.i. Project Involvement**

The organizations/groups listed below represent a broad and diverse group of entities with meaningful involvement in the success of the project.

**IV.E.2.b.ii. Project Roles**

<b>Org/Entity</b>	<b>Point of contact</b>	<b>Project involvement</b>
<b>Town of Kersey</b>	Town Manager Christian Morgan, <a href="mailto:cmorgan@kerseygov.com">cmorgan@kerseygov.com</a> 970.353.1681	Project Lead, Community Input, Redevelopment
<b>Platte Valley School District</b>	Superintendent Jeremy Burmeister, <a href="mailto:jburmeister@pvre7.org">jburmeister@pvre7.org</a> 970.336.8500	Student Involvement
<b>Kersey Chamber of Commerce</b>	President Pam Elliott, <a href="mailto:admin@fr8.solutions">admin@fr8.solutions</a> 970.381.1980	Business liaison

<b>UpState Colorado</b>	President and CEO Richard Werner, <a href="mailto:rwerner@upstatecolorado.org">rwerner@upstatecolorado.org</a> 970.356.4565	Help the Town attract development partners
<b>Weld County Department of Public Health and Environment</b>	Division Director Dan Joseph, <a href="mailto:djoseph@weldgov.com">djoseph@weldgov.com</a> 970.400.6415	Subject matter expert and advocate for community environmental health and solutions
<b>Downtown Colorado, Inc.</b>	Executive Director Katherine Correll, <a href="mailto:director@downtowncoloradoinc.org">director@downtowncoloradoinc.org</a> 303.282.0625	Helping with community input and redevelopment strategies

**IV.E.2.b.iii. Incorporating Community Input**

<b>Kersey Grain Elevator Community Engagement Plan</b>			
<b>Engaged Group</b>	<b>Activity</b>	<b>Schedule</b>	<b>Desired Outcome</b>
<b>Kersey Community</b>	Social media updates, website updates, press releases, community newsletter, project notes on monthly water bills	Ongoing	Community enthusiasm and awareness
<b>Platte Valley School District</b>	Invite youth to observe and engage in on-site learning opportunities	Ongoing	Authentic learning experience with project professionals in engineering, construction, environmental remediation
<b>Kersey Chamber of Commerce</b>	Meetings to provide project updates	Monthly	Investment in and awareness of the project
<b>Kersey Board of Trustees</b>	Meetings to provide project updates	Monthly	Investment in and awareness of the project

Community engagement is a cornerstone of this project because revitalizing downtown and reactivating the grain elevator property is such a high priority. The Town will collaborate closely with school district administration, the Chamber, and staff to communicate project progress and to ensure that citizen comments are considered and responded to in a meaningful way. We will continue to offer a variety of communication methods (Town's website, community newsletter, notes on utility bills, regular public meetings with the Kersey Board of Trustees, School District and Chamber of Commerce) to ensure that people have multiple opportunities to keep apprised of and to give input on the project.

In addition to continuous environmental and OSHA monitoring which will occur during the project, complaints related to the cleanup process can be reported daily to on-site personnel and resolved by the on-site contractor and the on-site environmental consultants as well as reported to the Town.

**IV.E.3 Task Descriptions, Cost Estimates, and Measuring Progress**

**IV.E.3.a Proposed Cleanup Plan**

The Town will issue a competitive Request for Proposals to engage a qualified environmental professional (QEP) to finalize and oversee the ABCA and cleanup plan and dispose of media in accordance with state and federal law. Contaminated media includes ACBM in concentrations greater than 1%. These materials will be abated by a General Abatement Contractor (GAC), in accordance with CDPHE Regulation 8. A qualified Project Manager will oversee the GAC to ensure regulations are followed and to conduct full visual inspections of asbestos abatement work areas. Following visual inspection, clearance testing will be conducted so that the work area can be deemed clean. Third-party oversight will be provided during the abatement activities to



conduct air sampling and clearance sampling by a State of Colorado Project Manager, per qualifications in Regulation 8, Part B. All ABCM will be properly disposed of at a licensed landfill facility approved to accept such waste. Clearance samples will be analyzed per the National Institute for Occupational Safety and Health (NIOSH) #7400 requirements and must show less than 0.01 fiber per cubic centimeter (fivers.cc) of asbestos in work area air. Prior to removal of the ACBM, the pigeon guano in the office will be cleaned and disinfected.

**IV.E.3.b Description of Tasks/Activities and Outputs**

<b>Task/Activity: Grant Administration</b>
<p><b>i. Project Implementation:</b> The Town Manger will oversee and supervise the Kersey Grain Elevator Brownfields grant. Activities include managing the Cooperative Agreement, procuring the consultant and contractor(s), conducting regular meetings with the consultant and EPA, output tracking for all tasks, tracking the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database entries, preparing the annual financial report and quarterly program reports to the EPA, and a final comprehensive report. We will enroll in the Voluntary Cleanup Program through CDPHE.</p>
<p><b>ii. Anticipated Project Schedule:</b> This activity will be initiated at project inception. Consultant selection will occur within three (3) months of securing the Cooperative Agreement. Contractor selection will occur after consultant selection and bidding is completed and within six (6) months of securing the Cooperative Agreement with work beginning immediately thereafter. Oversight and supervision of the grant and the remaining activities will occur concurrently throughout the grant period.</p>
<p><b>iii. Task/Activity Lead:</b> The Construction Administrator will be assigned as the lead for the remediation task and will be accountable to the Town for grant-related compliance. All work will follow federal procurement guidelines and an open bidding process. The Town will also hire a part-time employee to manage the grant.</p>
<p><b>iv. Outputs:</b> Document consultant and contractor selection, complete bi-monthly (every-other) meetings with EPA representatives throughout the grant period (up to 12 meetings), document outputs for all tasks under the Grant, ACRES reporting and a final report.</p>
<b>Task/Activity: Community Engagement</b>
<p><b>i. Project Implementation:</b> This task will build on the success of the visioning process already underway for the grain elevator and will engage similar stakeholders and community members in the Brownfield Grant project. Communication will include posting on the Town’s website, community newsletters and presentations at Kersey Board of Trustees meetings every other week.</p>
<p><b>ii. Anticipated Project Schedule:</b> This Task will be initiated within three (3) months of consultant selection and continue throughout the grant period.</p>
<p><b>iii. Task/Activity Lead:</b> The Town will hire a part-time Community Engagement Specialist for this work.</p>
<p><b>iv. Outputs:</b> A list of Stakeholder Group members, documentation from quarterly stakeholder meetings and public meetings, communication plan.</p>
<b>Task/Activity: Cleanup Planning</b>
<p><b>i. Project Implementation:</b> The Consultant will prepare a Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP), and a Final Analysis of Brownfield Cleanup Alternatives (ABCA) for submission and approval by the US EPA. Once approved, the consultant will prepare specifications by a State of Colorado Certified Project Designer for the cleanup plan to include the removal of ACM and pigeon feces. The consultant will obtain CDPHE Hazardous Materials and Waste Management Division approval of the cleanup plan. We will use the specifications for bidding and to select the cleanup contractor.</p>
<p><b>ii. Anticipated Project Schedule:</b> A QAPP, HASP and Final ABCA will be prepared within three (3) months of consultant selection. Specifications for cleanup and contractor bidding will occur within three (3) months of approval of the Final ABCA by the US EPA. Submittals to the CDPHE for approval of the cleanup plan will occur within 30 days of the USEPA approval of the Final ABCA.</p>

**iii. Task/Activity Lead:** Project Consultant, supported by the Construction Manager and US EPA/CDPHE.

**iv. Outputs:** Final QAPP, HASP, ABCA, Specifications and approved CDPHE cleanup plan.

**Task/Activity: Cleanup**

**i. Project Implementation:** The cleanup of Kersey Grain Elevator will include the removal of asbestos-containing materials and pigeon feces. After approval of the cleanup plan by CDPHE and US EPA, and contractor bidding and selection, the project will be scheduled. On-site oversight of the abatement contractor by a qualified Project Manager, in accordance with qualifications stated in Regulation 8, Part B will be provided by the consultant. A completion report will be prepared documenting the removal and proper disposal of all regulated materials and include surrounding air monitoring and personnel monitoring.

**ii. Anticipated Project Schedule:** The cleanup will occur after the approval of the underlying plans by US EPA and CDPHE. Contractor bidding will occur within 30 days of approval of all plans. Project startup is anticipated within 30 days of contractor selection. The project is expected to last 35 shifts, or about 7 weeks. The final report will be provided within six (6) months of cleanup completion.

**iii. Task/Activity Lead:** Project Consultant, supported by the Construction Manager, EPA & CDPHE.

**iv. Outputs:** Outputs to include bidding documents, completion report, air and personnel monitoring, documentation of the amounts of regulated materials removed, and CDPHE final approval of cleanup.

**IV.E.3.c. Cost Estimates**

Budget Category	Project Tasks				Total
	Grant Administration	Community Engagement	Cleanup Planning	Cleanup	
Personnel	\$7,000	\$1,740			\$8,740
Travel	\$4,100				\$4,100
Supplies		\$4,750			\$4,750
Contractual	\$15,000		\$20,000	\$1,080,309	\$1,115,309
Total Direct Costs & Budget	\$26,100	\$6,490	\$20,000	\$1,080,309	\$1,132,899

**Task 1 Grant Administration:** Personnel: The Town of Kersey is a small organization with limited resources. It will be necessary to hire trained staff to support this project (grant administrator 200 hours x \$35/hour = \$7000). Travel for 2 people to EPA grant training & conference flight (2x \$850 = \$1700); 4 nights lodging (2 x \$250 x 4=\$2000) per diem 4 days (2 x \$50 x 4=\$400). **Task 2 Community Engagement:** Personnel: Town will hire a Community Engagement Specialist (\$29/hour x 60 hours = \$1740). Supplies are for rendering of restaurant and a Project Sign. All contractual costs are from draft ABCA. Clean up is estimated to take 35 work shifts at \$3500/shift. Administrative expenses are 2.3% of the total requested funding.

**IV.E.3.d. Plan to Measure and Evaluate Environmental Progress and Results**

The Work Plan will include a detailed schedule of project milestones. At least monthly, the Town will track and evaluate progress in achieving outputs and milestones against the work plan schedule, in addition to communicating with the QEP and project contractors. The Town will increase monitoring and communication during the active cleanup phase to quickly address unexpected changes and monitor the project budget concurrent with tracking the schedule, on at least a monthly basis. The Town will document the project in the quarterly progress report to EPA and in EPA's ACRES database. Anticipated outcomes and results to be tracked include reduced volume of hazardous materials; funding leveraged; jobs created; community engagement.

**IV.E.4 Programmatic Capability and Past Performance**

**IV.E.4.a Programmatic Capability: i. Organizational Structure and ii. Description of Key Staff**

The Town of Kersey is a Manager – Board of Trustees (BOT) form of government with administration, recreation, and a police department. The Manager is appointed by the BOT. The Town outsources key

professional support including the Town Attorney, Town Engineer, and Town Planner. The Town has assembled a highly experienced team to ensure timely, safe, and cost-effective completion of the project. Combined, the project leadership has over 58 years of project management experience, overseeing millions in grant funds and projects totaling over \$50 million. The team also regularly contracts with highly qualified design, engineering, environmental, and legal professionals. It will continue to draw upon resources available for brownfields projects including Brownfields webinar trainings, CDPHE support, and Kansas State University's TAB program.

**Town Manager Christian Morgan** will be the brownfield program manager responsible for all legal, financial, and grant performance aspects of the project, including communicating with the EPA and contractors and ensuring execution of the work plan. Christian has managed over \$4.5 million in successful grant contracts with Colorado Department of Transportation (CDOT), Colorado Department of Local Affairs (DOLA), Colorado Energy Office, Colorado Broadband Office (CBO), Great Outdoors Colorado (GOCO), Department of Homeland Security, and the Federal Highway Transportation Administration. He successfully took the \$3.5 million Kersey Town Hall/Police Department and the \$975K Centennial Trail Project from concept to fruition.

**Town Engineer Gene MacDonald** will help oversee grant administration and remediation activities. He has written and implemented over \$40 million in grant contracts with FEMA, CDOT and the EPA, including a \$1 million EPA Brownfields grant for City of Cheyenne, WY and \$300K EPA Brownfields grant for City of Loveland.

**Town Planner Danna Ortiz** will provide community engagement and grant administration support. Danna has a master's in environmental policy and management and has written and implemented over \$8 million in grants through the Colorado Department of Natural Resources, DOLA, GOCO, and numerous foundations.

#### **IV.E.4.a.iii. Acquiring Additional Resources**

Should additional resources be needed, the Applicant will follow the competitive Procurement Standards in 2 C.F.R. 200.317-326 when hiring contractors. The project team is familiar with running large development projects and has established relationships with technical experts in the local community should they be needed. All remediation contractors will be selected through a public bidding process based on the specifications generated in the assessment process coupled with the Town's procurement policy.

#### **IV.E.4.b. Past Performance and Accomplishments; IV.E.4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements**

**IV.E.4.b.ii.1. Purpose and Accomplishments.** 1)The Town successfully implemented a \$975K Transportation Alternatives Program Grant (awarded by US Department of Transportation, Administered by CDOT) for a 4,000 linear foot multimodal trail/emergency route for First Responders.

2) Town implemented a \$1 million DOLA grant to construct Kersey Town Hall. We first collaborated with the owner of a decrepit co-op building to allow the town to appraise it. The owner subsequently donated the building to Dayspring Christian Academy (DCA), from whom the Town purchased it, raising money for DCA. The Town then negotiated a deal with High Plains Library District (HPLD) to sell the current Town Hall and use the proceeds to build a new one, which would serve as matching funds. HPLD invested \$1 million to create a new library in Kersey. The Town prepared quarterly grant progress reports, verified and submitted invoices for reimbursement, and ensured the project was per the specifications, on-time and within budget. The Town also obtained grants, donations, and technical assistance from the CO Energy Office and CSU Built Environment to integrate energy-saving features, including \$100,000 in solar energy and an EV charging station.

**IV.E.4.b.ii.2. Compliance with Grant Requirements.** 1)The Town successfully completed this 4-year (2017-2021) project, on-time and within budget and met all workplan, schedule and grant terms and conditions. 2) Town obtained the DOLA grant in 2019 and moved into the \$3.5 million Town Hall/Police Station in 2020. The EV charging station serves a broad region, and the solar panels help ensure that the building's power is more reliable.

## **Threshold Criteria for Cleanup Grants**

### **III.B.1 Applicant Eligibility**

The Town of Kersey is a local government in Weld County, Colorado and is therefore eligible to apply for this Cleanup grant.

### **III.B.2 Previously Awarded Cleanup Grants**

I affirm that the proposed site(s) has/have not received funding from a previously awarded EPA Brownfields Cleanup Grant.

### **III.B.3 Expenditure of Existing Multipurpose Grant Funds**

I affirm that my organization does not have an active EPA Brownfields Multipurpose Grant.

### **III.B.4 Site Ownership**

I affirm that the Town of Kersey owns the Grain Elevator at 501 1st Street, Kersey, CO 80644.

### **III.B.5 Basic Site Information**

Site Name: Town of Kersey Grain Elevator

Address: 501 1st Street, Kersey, CO 80644

Owner: Town of Kersey

Date of Ownership: 06/15/2023

### **III.B.6 Status and History of Contamination at the Site**

a) This site is contaminated with asbestos-containing material and pigeon guano.

b) Originally built in the early 1900s, the property burnt down twice. It was most recently reconstructed in 1962. The property was used for grain processing, storage and sales of agricultural feed and supplies until approximately 2000. It has been vacant ever since, plagued with substantial asbestos.

c) The Phase 2 Assessment identified asbestos in approximately:

- 300 square feet (SF) of texture (on non-detect drywall)
- 2,000 SF of roofing tar
- 120 SF of cementitious roof edge material
- 13,500 SF of compound/plaster material on concrete silo
- 768 SF compound/plaster material on warehouse seams
- 800 SF of exterior black tar.

The Assessment noted that there were areas that may also include asbestos-containing materials (ACM) that were inaccessible or would require selective demolition or deconstruction activities to facilitate identification (i.e., behind covered walls and/or ceilings, inside areas of ductwork and/or mechanical equipment components) or within inaccessible areas (e.g., the flooded basement area).

The Assessment also stated that the office on the south side of the silo contains a significant amount of pigeon guano which must be removed and disinfected before the ACM can be removed in accordance with CDPHE Regulation 8.

d) The ACM is in the building materials.

### **III.B.7 Brownfield Site Definition**

I affirm the site is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

### **III.B.8 Environmental Assessment Required for Cleanup Applications**

I affirm that a written ASTM E1903-19 or equivalent Phase II environmental site assessment report has been completed for: Town of Kersey Grain Elevator. Partners Environmental completed a limited Phase 2 Environmental Assessment and Analysis of Brownfields Cleanup Alternatives (October 24, 2023). Prior to that, the Town obtained the following reports: Memorandum: Soil and Groundwater Screening Assessment, Kersey,

CO – Parcel Screening (June 7, 2022, Jacobs); Asbestos Inspection and Sampling Report, 501 1st St., Kersey, CO, (May 26, 2023, Banyan Environmental); and Phase I Environmental Site Assessment, UPRR Grain Elevator, Trumbull Street & 1st Street, Kersey, Colorado (June 12, 2023, Paragon Consulting Group, Inc.).

### **III.B.9 Site Characterization**

1. According to a letter from CDPHE dated November 11, 2023, the grain elevator site has been adequately characterized, is eligible to be enrolled in the state VCUP, and will be enrolled into the VCUP once final cleanup planning has taken place. CDPHE submitted this letter directly to the EPA.
2. As part of the draft ABCA prepared on October 24, 2023, Partners Environmental, who qualify as an Environmental Professional (as defined in 40 CFR § 312.10) has certified that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site(s).

### **III.B.10 Enforcement or Other Actions**

I affirm there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

### **III.B.11 Sites Requiring a Property-Specific Determination**

I affirm that the site does not need a Property-Specific Determination from the EPA to be eligible for Brownfields Grant funding.

### **III.B.12 Threshold Criteria Related to CERCLA/Petroleum Liability**

#### **III.B.12.a Property Ownership Eligibility - Hazardous Substance Sites**

##### **III.B.12.a.i Exemptions to CERCLA Liability**

###### **III.B.12.a.i.1 Indian Tribes**

Not applicable.

###### **III.B.12.a.i.2 Alaska Native Village Corporations and Alaska Native Regional Corporations**

Not applicable.

###### **III.B.12.a.i.3 Property Acquired Under Certain Circumstances by Units of State and Local Government**

Not applicable. The Town of Kersey purchased the property from Union Pacific Railroad on June 15, 2023. The site was not acquired via seizure, bankruptcy, tax delinquency, or abandonment.

##### **III.B.12.a.ii Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability**

N/A. The Town purchased this property after January 11, 2002.

##### **III.B.12.a.iii. Landowner Protections from CERCLA Liability**

###### **III.B.12.a.iii.1 Bona Fide Prospective Purchaser Liability Protection**

- The Town of Kersey (owner) acquired title to the Kersey Grain Elevator property after January 11, 2002.
- The owner conducted all appropriate inquiries (AAI) prior to acquiring the property. Paragon Consulting Group, Inc. conducted a Phase I Environmental Site Assessment using the ASTM E1527-21 (or ASTM E2247-16) standard practice on June 12, 2023, before the property was acquired on June 15, 2023.
- The is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination. (Affiliations include familial, contractual, financial, or corporate relationships that are the result of a reorganization of a business entity with potential liability.)
- All disposal of hazardous substances at the site occurred before the Town acquired the site.
- The Town is exercising appropriate care by taking reasonable steps to address releases by applying for this cleanup grant. The Town is not aware of any continuing releases.
- The owner will comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls associated with response actions at the site.
- The owner will provide full cooperation, assistance, and access to authorized persons.

- The owner will comply with any CERCLA information requests and administrative subpoenas and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.
- The owner will not impede the performance of a response action or natural resource restoration.

**III.B.12.a.iii.1.a Information on the Property Acquisition**

The Town acquired fee simple title of the property by negotiating a purchase with the previous owner of the property, the Union Pacific Railroad on June 15, 2023. UPRR sold the property for a nominal price once the Town alerted them to the asbestos and the extensive pigeon guano on their property. The Town did not cause or contribute to any release of hazardous substances at the site. The Town has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

The Town has no familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators (or other potentially responsible parties) of the property (including the entity from which we acquired the property).

**III.B.12.a.iii.1.b Pre-Purchase Inquiry**

The Town obtained the following assessments prior to taking ownership of the property:

- Memorandum: Soil and Groundwater Screening Assessment, Kersey, CO – Parcel Screening, prepared for Scott Selken/UPRR by Jacobs, dated June 7, 2022.
- Asbestos Inspection and Sampling Report, 501 1st St., Kersey, CO, prepared for the Town of Kersey by Banyan Environmental (Banyan), dated May 26, 2023.
- Phase I Environmental Site Assessment, UPRR Grain Elevator, Trumbull Street & 1st Street, Kersey, Colorado, prepared for the Town of Kersey c/o Resource Conservation Partners, LLC by Paragon Consulting Group, Inc. (Paragon), dated June 12, 2023.

**III.B.12.a.iii.1.c Timing and/or Contribution Toward Hazardous Substances Disposal**

I affirm that any disposal of hazardous substances at the site occurred before the Town acquired the property. The Town did not cause or contribute to any release of hazardous substances at the site. I further affirm that the Town has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**III.B.12.a.iii.1.d Post-Acquisition Uses**

The Town purchased the abandoned property on June 15, 2023. There are no current or prior users of the property during the time of the Town's ownership.

**III.B.12.a.iii.1.e Continuing Obligations**

The Town purchased this property because we have been unable to get the railroad to take any steps to remediate it. We are applying for this grant to stop any continuing releases; prevent any threatened future release; and, prevent or limit exposure to any previously released hazardous substance. The Town does not have the resources to remediate this property on its own.

I confirm the Town's commitment to:

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

**III.B.12.a.iii.2 Non-Publicly Owned Sites Acquired Prior to January 11, 2002**

N/A

**III.B.13 Cleanup Authority and Oversight Structure**

**III.B.13.a Cleanup Oversight**

The cleanup of Kersey Grain Elevator will include the removal of asbestos- containing materials and pigeon feces. After approval of the cleanup plan by CDPHE and US EPA, and contractor bidding and selection, the project will be scheduled. On-site oversight of the abatement contractor by a qualified Project Manager, in accordance with qualifications stated in Regulation 8, Part B will be provided by the consultant. A completion report will be prepared documenting the removal and proper disposal of all regulated materials and include surrounding air monitoring and personnel monitoring. According to a letter from CDPHE dated November 11, 2023, the grain elevator site has been adequately characterized, is eligible to be enrolled in the state VCUP, and will be enrolled into the VCUP once final cleanup planning has taken place.

**III.B.13.b Access to Adjacent Properties**

Access to other properties for cleanup response activities is not required.

**III.B.14 Community Notification**

**III.B.14.a Draft Analysis of Brownfields Cleanup Alternatives**

I affirm that a draft ABCA has been completed for this cleanup grant application. The

**III.B.14.b Community Notification Ad**

Town of Kersey Grain Elevator: A public meeting was held on October 24, 2023, at 6:00 p.m. and a community notification ad was published in the Greeley Tribune on October 20, 2023. The ABCA and draft application were posted on the Town’s website and available at Town Hall as of October 16, 2023.

**III.B.14.c Public Meeting**

On October 24, 2023, at 6:00 p.m., the Town of Kersey Board of Trustees held a public meeting at the Kersey Town Hall, located at 446 1st Street, Kersey, Colorado. During this meeting, the Board of Trustees invited community members to provide input on the Town of Kersey’s EPA Brownfields application and review the draft Analysis of Brownfields Cleanup Alternatives (ABCA).

The Town welcomed input from all interested parties who could provide feedback in the following ways:

- **Written Comments:** Submit written comments to the Town Clerk Julie Piper at Town Hall.
- **Mail Comments:** Mail comments to Ms. Piper at P.O. Box 657, Kersey, CO 80644.
- **Email Comments:** Send electronic comments to JPiper@kerseygov.com.

No one in the audience had comments on the draft grant application or the draft ABCA. Planner Ortiz said that the Town will continue to welcome feedback and she will talk with anyone who has questions or would like to learn more.

**III.B.14.d Submission of Community Notification Documents**

The community notification documents requested by the EPA are attached to this application.

**III.B.15 Contractors and Named Subrecipients**

The Town of Kersey will not procure a contractor until we have the funding available to do so.

November 9, 2023

Jennifer Benz  
Environmental Protection Agency  
Region 8 Brownfield's Program  
1595 Wynkoop Street (EPR-B)  
Denver, Colorado 80202-1129

Via email - [Benz.Jennifer@epa.gov](mailto:Benz.Jennifer@epa.gov)

RE: Town of Kersey Grain Elevator - FY24 Cleanup Grant Proposal - Kersey, Colorado

Dear Ms. Benz:

I am writing to express CDPHE's support of the Town of Kersey FY 2024 cleanup grant proposal for the Town of Kersey Grain Elevator in Kersey, Colorado. Like many rural communities in Colorado, Kersey faces significant economic disadvantages due to its aging infrastructure, small population, high poverty rates, and low growth in wages and economic activity. The Town of Kersey Grain Elevator is an excellent candidate for brownfields cleanup funding. Cleanup and revitalization of the property will achieve a number of goals important to both the Town and local stakeholders such as removing blight and a safety hazard, creating jobs, and attracting new investment that can propel the Town's revitalization efforts forward.

CDPHE has reviewed the site characterization data associated with this proposal and determined that the site has been adequately characterized by qualified environmental professionals and the asbestos characterization was completed by a state- and AHERA-certified Qualified Environmental Professional, who followed state and federal regulations in the sampling scope and methodology. While this project is technically eligible to enroll in the Voluntary Cleanup (VCUP) Program, asbestos abatement projects would not typically enroll in Colorado's VCUP Program, but would be cleaned up pursuant to Colorado asbestos abatement regulations overseen by the department's Air Pollution Control Division. Based on the expertise and certifications required for the assessment, CDPHE is confident that the assessment is sufficient to prepare the required notification/permit application required of asbestos abatement projects. A final determination of the adequacy of site characterization will be made by the department's Air Pollution Control Division following receipt of the permit application. Should additional site characterization be required, the department's brownfields program can



assist the applicant in collecting the necessary data prior to the June 15, 2024 deadline specified in the grant solicitation guidelines.

Pending a successful proposal by the Town of Kersey, CDPHE has additional resources to assist completion of the activities outlined in the proposal. These resources range from technical and planning resources to financial resources to assist with the cleanup. CDPHE has informed the property owner of the availability of these resources and can assist with the application process if requested.

In closing, I again want to express the department's support for the Town of Kersey Grain Elevator Cleanup Grant Proposal. CDPHE hopes that successful cleanup and redevelopment of the Town of Kersey Grain Elevator can serve as a catalyst that spurs revitalization of additional properties within Kersey.

Sincerely,



Kathleen Knox  
Superfund/Brownfields Project Manager  
Hazardous Materials and Waste Management Division

cc: Danna Ortiz, Town of Kersey  
Christian Morgan, Town of Kersey

