

**EPA Brownfield Cleanup Grant Narrative Information Sheet**

**1. Applicant Identification:**

Port of Arlington Environmental Sentry Corp  
100 Port Island Road  
Arlington, OR 97812

**2. Funding Requested:**

- (a) Grant Type: Single Site Cleanup
- (b) Federal Funds Requested:  
Requested Amount: \$780,000

**3. Location:**

- (a) City: Condon
- (b) County: Gilliam County
- (c) State: Oregon

**4. Property Information:**

Former Condon Grade School  
220 South East Street, Condon, Oregon, 97823

**5. Contacts:**

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Executive Director  
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- (b) Chief Executive/Highest Ranking Elected Official:  
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**6. Population:** Population of 763 in Condon, Oregon, according to 2021 ACS data.

**7. Other Factors:**

Other Factors	Page #
Community population is 10,000 or less.	Narrative page 3

Other Factors	Page #
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.	NA
The proposed site(s) is adjacent to a body of water (i.e., the border of the 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 proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	N/A
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

## 1. Project Area Description and Plans for Revitalization

### a. Target Area and Brownfields, i. Overview of Brownfield Challenges and Description of Target Area

The Port of Arlington Environmental Sentry Corp (Sentry Corp), an Oregon nonprofit corporation, requests \$780,000 for a U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Program grant to remediate a vacant, contaminated school building (the former Condon Grade School) located in Condon, Oregon, in Gilliam County, census tract 9601 (the Site). Condon, historically a farming and ranching community, is a small city (0.83 square miles) located in north-central Oregon approximately 150 miles east of Portland and 38 miles south of the Columbia River. The Target Area is the City of Condon which has a population of less than 1,000 people. The Target Area has high rates of poverty, disability, and unemployment. The former Condon Grade School is contaminated with hazardous building materials (HBM) that have the potential to cause long-term human health effects and environmental issues at the Site and in the community. These contaminants will need to be addressed before safe reuse or redevelopment of the Site can occur. This is important because the community is in dire need of affordable housing and additional buildable lands, which the Site could provide if cleaned up. The remoteness of Condon combined with its small population and high poverty rates, makes addressing this brownfield site almost impossible for the community without support.

### ii. Description of the Proposed Brownfield Site

The proposed brownfield site is located east of downtown at 220 South East Street, Condon, Oregon, 97823. It comprises approximately 3.16 acres in Gilliam County tax lots 04S21E10DB-01400 and 04S21E10DB-01500. According to Gilliam County, the Site is currently zoned as P (Public Facility). A two-story school building is located on the western portion of the Site and a fenced-in playground and grassy field are on the eastern portion. The school building is approximately 45,300 square feet in size and includes a covered and heated recreation area, referred to as the play shed. The central, two-story portion of the school building was constructed in the early 1920s, the play shed addition was constructed in 1955, the two single-story wings of classroom additions (on the north and south ends of the building) were constructed in 1958, a locker room extension was added to the play shed in 1964, and the library was added in 1966.

The Site has been vacant since the end of the 2021–2022 school year, when the Condon School District relocated students to a new elementary school constructed at a separate campus in 2021. In April 2023, the Site was deeded from the City to Sentry Corp for the purpose of managing its cleanup and redevelopment. Prior to Sentry Corp’s acquisition of the Site, a Phase I environmental site assessment (ESA) was completed for the Site in accordance with ASTM International Standard ASTM 1527-21 on behalf of Sentry Corp (MFA 2023). A previous Phase I ESA was also conducted at the Site in April 2021 on behalf of the City (MFA 2021). Both Phase I ESAs identified that known (e.g., materials labeled as asbestos-containing) and suspected HBM were present throughout the school building, and additional sampling and analysis of suspected HBM was recommended.

HBM surveys were conducted at the Site in January and March 2022 and October 2023 by AHERA-accredited building inspectors in general accordance with ASTM International Standard ASTM E1903-19 and summarized in a hazardous building material survey report (MFA 2022, to be updated and reissued November 2023). The surveys identified asbestos-containing materials (ACM), lead-based paint (LBP), and other HBM (e.g., fixtures containing mercury or polychlorinated biphenyls [PCBs], such as thermostats and lights) in the buildings at the Site.

Due to the age of the building and the building’s continual use as a school for just over 100 years, portions of the building are in poor condition, including finish materials that contain asbestos or lead (e.g., floor or ceiling tiles, exposed mastic, HVAC duct tape, cracked or chipping paint) and structural damages. HBM that is damaged, cracked, or becomes friable can pose a more immediate exposure risk if not properly abated, thus the HBM identified in the buildings at the Site must be addressed before productive reuse of the Site can occur. Addressing HBM is needed to prevent or limit potential exposure of current and future Site users, workers, and other ecological receptors to hazardous substances. A structural survey, completed at the Site in 2022, confirmed that structural repairs and seismic upgrades will be required in the building for safe reuse or renovation (Livermore 2022), and additional structural evaluations of the building are planned to be conducted in November 2023.

### b. Revitalization of the Target Area, i. Reuse Strategy and Alignment with Revitalization Plans

The reuse strategy will be centered around mixed income housing, workforce housing, and the creation of community spaces; this aligns with and advances two main plans—the Rural Development Initiative’s *Condon Can!* plan, and the Comprehensive Economic Development Strategy (CEDS) from the Greater Eastern Oregon Development Corporation, described in Table 1. The *Condon Can!* plan is specifically focused on creating a vision plan for Condon 2050 that includes goals for housing, economic development, and community health. This plan is being developed with consideration of the former Condon Grade School project. The goals and projected outcomes of the project are in alignment with the priorities listed in the CEDS, specifically in relation to building workforce housing and grant attainment. The reuse strategy aligns with and advances the City’s current and ongoing revitalization plans. The Site is not in a floodplain.

**Table 1. Reuse Strategy's Alignment with Revitalization Plans**

Entity	Plan	How Project Relates
Rural Development Initiatives	<i>Condon Can!</i>	This project will create a visioning plan for Condon 2050 and will focus on rural development and revitalization, and housing.
Greater Eastern Oregon Development Corporation	<a href="#"><i>Comprehensive Economic Development Strategy</i></a>	The 2014–2019 Comprehensive Economic Development Strategy (CEDS) is intended to guide economic development in the 7-county region of Gilliam, Morrow, Umatilla, Wheeler, Grant, Harney, and Malheur counties. It includes goals of workforce housing and grant attainment. Community surveys identified vacant building assessment and reuse as a priority.
City of Condon	<i>Comprehensive Plan</i>	The City's Comprehensive Plan includes goals of increasing housing stock through a variety of different needed housing types.
Condon City Council	<i>Condon Goals and Priorities*</i>	Relevant goals include working with Sentry Corp to develop the Condon Grade School and investigate funding sources to develop buildable lots for housing.

\*The Condon Goals and Priorities are not a revitalization plan, but they specifically represent and reference the current needs of the City.

## ii. Outcomes and Benefits of Reuse Strategy

The plan for the Site is to examine a variety of community-oriented alternatives, with a focus on mixed income housing. There has been extensive community engagement which has highlighted housing as the desired and most needed use for the site. Other community spaces such as a small grocery store or a daycare could also be present on the site and are under consideration. The primary goal of the cleanup is first to contain and eliminate the human health and environmental risks that are associated with the present contamination; followed by adaptive reuse. Cleanup and adaptive reuse of the Condon Grade Elementary School will help to build affordable, healthy, and adequate housing, which is sorely lacking; decrease risks of environmental contamination and human health impacts; and help to build community resources. The project will not cause any displacement or negatively impact priority populations and should help avoid displacement of sensitive populations by providing accessible housing options within the Condon community.

Cleanup of this site would decrease the number of brownfield sites in such a small community. This effort will result in the reduction of environmental risks to the community and will make the site accessible for reuse or redevelopment. Currently, the primary goal is to determine whether the school building itself could be renovated to be affordable housing, with classrooms turned into individual apartments. Alternatively, if the *school building* is deemed unusable for housing, its demolition would clear the site for construction of new housing. The size, location, and utility connections to the Site create a prime opportunity for housing, especially as Condon lacks developable land. Affordable housing is a necessary community asset that directly impacts personal and community health. Increasing the housing stock (affordable and market) in a city such as Condon is fundamental to the ongoing development of the community. It will allow those already suffering from the impacts of poverty to not be further impacted by inadequate housing; it will also provide housing opportunities for people moving to Condon.

Condon has some of the oldest housing stock in Oregon, with most houses built before 1939 ([Allen 2021](#)). 43% of all homes in Condon were built before World War II, in comparison to 11% in Oregon overall, and 13% nationally. In addition, the vacancy rate in Condon is estimated to be around 20% ([Bestneighborhood 2021](#)). This combination of old homes and high vacancies means that the community is plagued by old and dilapidated homes that are often unsafe or need renovations before they are suitable to live in. The COVID-19 pandemic changed the current economy; many who used to live in rural areas or the suburbs are indicating a desire to move back as the work-from-home movement has grown. This is an opportunity for Condon to attract workers and families interested in relocating. However, the current housing stock in Condon cannot accommodate this.

Additionally, showcasing the City as an attractive place for new—and especially younger populations—to move to is an important step for building a sustainable community and economy. This reuse strategy is especially important, as the City would not have the funding to create these opportunities otherwise, leaving gaps in housing availability and affordability. The ideas for these reuse strategies were born from discussions within the Condon Grade School Committee, Sentry Corp, the City of Condon, and other community stakeholders. Members of the community have been discussing the potential reuse outcomes for the Site since before it was deeded to the City in 2020.

In April 2022, the Condon Grade School Committee was formed with nine community members and two City councilors and, in July 2022, the committee traveled to Baker City, Oregon, to tour a site that underwent a similar

transformation (school and a hospital turned into housing) and learn how that community executed that housing project. Monthly Sentry Corp meetings held since July 2022 have focused on this project, including discussing progress updates, hosting interested community stakeholders for discussion (e.g., Condon Grade School Committee, Gilliam County Court) and providing tours of the Site.

### c. Strategy for Leveraging Resources

#### i.–iii. Resources Needed for Site Characterization/Remediation/Reuse (1.c.i through 1.c.iii)

Sentry Corp is eligible for various funding sources and has experience in obtaining and managing grant awards successfully for past projects. Sentry Corp has limited funding to support this project and this EPA grant will provide sufficient funding for the core activities of cleanup. Additional funding may be needed for secondary cleanup activities, future planning, and general reuse activities. Any additional monetary resources needed for future revitalization of the target area will be secured through the required legislative processes or grant-seeking measures. The successful completion of this project will open the door for future opportunities for federal or non-federal support.

**Table 2. Potential Resources for Reuse**

Name of Resource	Assessment, Remediation, or Reuse Activities?	Secured or Unsecured	Additional Details or Information
Business Oregon Rural Opportunity Initiative	1.c.iii. Reuse	Unsecured	\$60,000 to develop a strategy, gather partners, develop tactics, and coordinate resources to fully occupy the redeveloped Site and position Condon as a gateway to central Oregon attractions. (Two additional phases of funding, Launch and Scale, are available under this opportunity.)
Business Oregon Port Planning and Marketing Fund	1.c.iii. Reuse	Unsecured	\$18,000 to conduct a market study to assess regional needs and opportunities and strengthen local and regional partnerships, resulting in a strategic business plan for the redeveloped facility.
Business Oregon Brownfields Redevelopment Fund	1.c.iii. Assessment and/or Remediation	Applied	Up to \$60,000 of grant funding towards any additional cleanup activities or planning that is not covered by the EPA grant.
Gilliam County Redevelopment Grant	1.c.iii. Reuse	Secured	\$487,500 of funding to support redevelopment of the site into housing.
Avangrid Contribution Award	1.c.iii. Reuse	Secured	\$461,250 to support redevelopment activities.
Integrated Planning Grant from Business Oregon	1.c.iii. Reuse	Applied	Up to \$25,000 of grant funding for conceptual reuse analysis and structural evaluations.
Oregon Brownfields Cleanup Fund	1.c.ii. Remediation	Unsecured	Low-interest loan and grant financing for cleanup projects on properties impacted by the existence of hazardous substances and for which cleanup is necessary for development or redevelopment to occur.

#### iv. Use of Existing Infrastructure

An overall goal for the redevelopment is to assess how the Site can best be used for affordable housing and whether the school building can be retained for this use. Retaining the building to create housing is preferred by the community and project stakeholders and will be prioritized if possible. Assuming this is the case, most existing utility infrastructure (e.g., electrical, water, sewer) will be retained to serve the new use. Some utility updates will likely be needed, specifically transitioning the heating system from oil to electric or another form.



These needs will be assessed as part of the conceptual use evaluation and will inform a funding strategy for the Site's redevelopment.

## 2. Community Need and Community Engagement

### a. Community Need, i. The Community's Need for Funding

Condon is a small (population 763), low-income community. It is considered distressed by the State of Oregon, which is determined by assessing economic characteristics such as poverty, per capita income, and employment rate. In Condon, the economic distress is evident with a poverty rate of 18.2%, and per capita income rate of \$25,288. The community also has a low employment rate (32.4%) compared to almost 60% for the state. Much of the City's recent project funding has come from a variety of statewide and county-level grants, as the tax base alone is not enough to support municipal improvements and projects. With a tax base of only \$250,000 per year, grant money is necessary for the City to complete any planning projects or brownfield cleanups. This is already a constraint as the City has to compete for grant funding to complete even the smallest of municipal projects, such as partial sidewalk repairs. The City is struggling to leverage additional types of economic activity that could increase its tax base, such as tourism or recreation activities, business expansion, and new business entries. This is not due to lack of opportunity or assets, but rather lack of funding and healthy, affordable housing.

According to a [2019 economic opportunity analysis](#), the City has several assets and locational advantages that could provide opportunities for tourism or to expand existing businesses (Oregon Department of Land Conservation and Development 2019). These include the historic downtown, a golf course, and the fact that Condon serves as a gateway to multiple state parks, the John Day Fossil Beds, and the John Day River. A lack of affordable residential and workforce housing in the City was identified as a major hindrance to capitalizing on these opportunities.

The EPA Brownfield grant would enable the community to clean up a site that is currently posing a threat to human health and the environment. Redeveloping the former Condon Grade School has the potential to create affordable housing and commercial spaces that would prove attractive to businesses looking to expand into a location that is a gateway into the natural beauty of central Oregon. Of all the identified potential cleanup sites in Gilliam County, more than half are located in Condon and the City is financially unable to address them. It is possible that there are additional contaminants that are impacting communities and neighborhoods that are not represented in the data. The ability to address just one of these sites has the potential to provide huge benefit to the community.

**Table 3. Economic Distress Data**

Indicator	Target Area	Gilliam County	Oregon	U.S.
Population (2017–2021)	763	1,954	4,207,177	329,725,481
Population (2017–2021) Change Since 2010	81	83	376,103	20,979,943
Median Household Income (2017–2021)	\$35,000	\$51,705	\$70,084	\$69,021
Per Capita Income (2017–2021)	\$27,636	\$30,182	\$37,816	\$37,638
Below Poverty Level (2017–2021)	18.2%	11.8%	12.1%	12.6%
Unemployment Rate (2017–2021)	13.3%	5.7%	5.6%	5.5%

#### Notes

Shading indicates disparities compared to Gilliam County, Oregon, or the U.S.

Data Source: U.S. Census 2021 American Community Survey 5-year estimates (2017–2021). 2010 Decennial Census: P1 Total Population.

<sup>a</sup>Target area totals are for population; all other variables (i.e., Median Household Income) show averages unless noted.

### ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations

The City has a particularly high proportion of elderly individuals, high poverty rates, and lower median incomes (Tables 3 and 4). Vulnerable and sensitive individuals make up a significant portion of the population; almost 50% of residents are over 65 and 19.2% of those live in poverty. This small community is aging and has a high rate of disabled individuals (more than 20%), nearly twice the rate of disability in the country.

**Table 4. Identifying Sensitive Populations**

Indicator	Target Area	Gilliam County	Oregon	U.S.
Age over 65	49.9%	29.9%	17.7%	16.0%
Age over 65 below poverty	19.2%	13.1%	8.5%	9.6%
Age under 18	7.6%	17.2%	20.8%	22.5%
Disability	20.6%	16.2%	14.4%	12.6%

**Notes**

Data Source: U.S. Census 2021 American Community Survey 5-year estimates (2017–2021).

**Table 5. Environmental Justice Screening and Mapping Tool (EJScreen) Data**

Supplemental Indexes	Percentile in	
	State	U.S.
Diesel Particulate Matter	10	4
Ozone	83	12
Lead Paint	85	75
RMP Facility Proximity	84	77

**Notes**

Shading indicates percentile is above 80<sup>th</sup> percentile.  
 RMP Facility = a facility that has submitted a risk management plan to the U.S. Environmental Protection Agency.

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

Table 5 shows the pollutant and socioeconomic factors identified in EJScreen that disproportionately impact the residents of Condon, based on the Supplemental Indexes. In comparison to the state, Condon has higher exposure to ozone, lead paint, and a greater proximity to facilities that have submitted risk management plans to EPA (RMP facilities). Ozone and lead paint are associated with a variety of health impacts in humans.

According to the EPA and The Lancet Public Health, exposure to lead (paint) is associated with high blood pressure, cardiovascular diseases, nerve disorders, reproductive issues, memory problems, and muscle and joint pain (EPA 2023, Lanphear et al. 2018). Similarly, exposure to ozone can cause new health problems and exacerbate existing ones.

According to the U.S. Centers for Disease Control and Yale School of Public Health, ozone pollution can cause coughing, difficulty breathing, aggravate asthma and chronic obstructive pulmonary disease (COPD), and cause cognitive decline in older adults (CDC 2023, Gao et al. 2022). Those who are near RMP facilities are most at risk for exposure if there is an accidental chemical release.

Tables 6 and 7 show the elevated rates of negative health impacts in Condon. Table 6 provides Environmental Justice Screening and Mapping Tool (EJScreen) data that shows higher rates of cancer, heart

disease, and disability for the Target Area than elsewhere. This is significant, as exposure to lead and ozone are directly linked with heart disease and physical disability. While not all impacts from these pollutants can be specifically measured (i.e., memory problems, joint pain), they are likely to have a disproportionate impact on sensitive populations, such as those who are already disabled, ill (with diseases such as cancer), elderly, or impoverished. Additionally, some of these impacts may contribute to the high rate of disability that already exists in Condon. Experiencing chronic illnesses, pain, or worsened preexisting conditions has a more significant impact on those who are impoverished as these negative health impacts further impact the ability to work and pay bills, furthering the impacts of poverty in the community.

Table 7 shows the Centers for Disease Control’s PLACES health data, which indicate high prevalence of stroke, elevated blood pressure, COPD, and asthma in Condon. These health burdens have both direct and indirect links to the identified pollutants. For example, the prevalence of stroke is a significant factor that impacts residents; the estimated rate is 4.9, which is 36% greater than the national average of 3.4. Although stroke is not directly associated with exposure to lead or ozone, one of the major risk factors of stroke is high blood pressure, which is directly linked to lead poisoning. The data show that, in addition to a higher rate of stroke in the Target Area, there is also an elevated level of high blood pressure. The data also show that there are increased levels of COPD and asthma, which can be exacerbated by exposure to ozone. The connections between exposure, risk factors, and disease are clearly present in this community. Overall, these health burdens are both directly and indirectly associated with pollutants in the community, as well as a general lack of resources. Moreover, as noted above, it is possible that not all impacts are accurately shown as they are not as measurable, indicating that the health of the community may be worse than it appears in the data. This grant and related cleanup strategy will reduce exposure risks to the people in the Target Area, promoting more environmental and health justice.

Measure—EJScreen	Health Indicator (percentiles)	
	Oregon	U.S.
Cancer	91	90
Heart Disease	90	94
Persons with Disabilities	61	71

Source: [Environmental Justice Screening and Mapping Tool](#).

Table 7. Inequitable Health Burdens Measure—PLACES Data	Health Value	
	Target Area	U.S.
High Blood Pressure	40.4%	34.5%
COPD	10.5%	7.9%
Prevalence of Stroke	4.9%	3.4%
Asthma	11.0%	10.4%

Source: [Centers for Disease Control PLACES data set.](#)

**(3) Promoting Environmental Justice, a. Identification of Environmental Justice Issues**

The small, rural community of Condon is economically struggling, aging, and overburdened by poverty. As captured by the tables above, the community is distressed by environmental factors and exposure to pollutants. While the community ages, the number of children remains relatively low (7.6% under 18), presenting additional problems. Without young people entering the workforce, the already small tax base will shrink even further. Elderly residents experience more severe health impacts from exposure to pollutants and are less likely to find younger and healthier people available locally to provide health services. Without a growing population to increase the tax base, help provide services, and take care of the vulnerable population, the already sensitive population will continue to suffer. On top of this, Condon is considered a food desert, exacerbating the need to use cars to travel, thereby increasing air pollution and impacting vulnerable populations.

Condon is faced with the multiple challenges of a lack of affordable and adequate housing, diminishing tax base and lack of economic development, and an aging population. The former school Site can help to provide a solution through the production of affordable housing and potentially mixed-use community-focused uses. Directing grant benefits to this economically and environmentally burdened community can result in the revitalization of the identified brownfield site. This would provide direct benefits to this impoverished and sensitive community by reducing contamination and facilitating alternative development. Redevelopment of this site could provide increased affordable housing and community facilities, which may in turn encourage further economic development by providing adequate space for new business owners and employees.

**b. Community Engagement, i.–ii. Project Involvement and Project Roles (2.b.i through ii)**

This project enjoys a high degree of community support and has received attention from several organizations in and around Condon (Table 8).

Table 8. Project Involvement and Project Roles		
Name of Organization/Entity/Group	Point of Contact	Specific Project Role or Assistance Provided
Gilliam County	Judge Elizabeth Farrar Campbell	Current and possibly future funding assistance such as gap funding; potential decision-making power.
City of Condon	Kathryn Greiner, City Administrator	Working partner in planning, finances, and management of infrastructure post cleanup.
Condon School District	Superintendent Bryan Schimel	Provide feedback for housing needs and youth programming that could be possible at the Site.
Summit Springs Village	David Greiner	Supporting stakeholder; local employer potentially interested in workforce housing for staff.
Port of Arlington	Jed Crowther	Primary/Lead Entity for cleanup.

**iii. Incorporating Community Input**

Sentry Corp and the City of Condon have shared copies of this EPA grant application and the analysis of brownfields cleanup alternatives (ABCA) with the community and project partners to solicit input on the proposed cleanup project. A community meeting took place on November 2, 2023, and 13 people attended. Notice of this meeting was published in the City of Condon newspaper and sent out to identified stakeholders. Community feedback indicated that there is strong interest and investment in what happens at the Site. Because of the size of Condon, the former grade school was one of the only options for children, so, if someone had been born in Condon, they would have attended the Condon Grade School. As a result, the community has shown a



high interest in the remediation and reuse of the school building independent of this most recent meeting. Sentiments from the meeting involved questions around abatement, adaptability of school buildings, and housing.

Sentry Corp will develop a public involvement plan (PIP) upon award notification and will work with the City of Condon to connect with stakeholders. The PIP will inform outreach activities and ensure that the community receives information on the cleanup and reuse strategy. Community vision and involvement will aim to ensure that the cleanup and reuse strategy for the Site is accurately meeting the needs of the community. Activities will include community visioning sessions, stakeholder workshops, and design charettes to guide redevelopment. Sentry Corp, the Port of Arlington, and the City of Condon will hold regular monthly community meetings to inform stakeholders of progress, as well as semiannual reporting sessions. Sentry Corp will collect attendance at each meeting, record public comments, and consider them when implementing the cleanup plan. Sentry Corp will also transparently report and share the meeting feedback online or via email.

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

**a. Proposed Cleanup Plan**

Sentry Corp will use the grant funds for the abatement of HBM, including asbestos and lead-based paint, from the former Condon Grade School buildings at the Site. The procured abatement contractor's cleanup activities will include abating and disposing of the HBM (e.g., materials containing asbestos, lead, mercury-containing thermostats, and light fixtures) as well as any additional HBM that are discovered during abatement activities. The hazardous building materials survey report (MFA 2022, updated 2023) identified over 24,000 square feet of asbestos-containing flooring, 9,000 square feet of asbestos-containing stucco siding, 10,000 square feet of asbestos-containing HVAC duct insulation tape, as well as other asbestos-containing, lead-containing, and mercury-containing building materials that will require abatement and disposal.

The preferred remedial action would implement full HBM abatement to prevent exposure of human receptors to the hazardous substances contained in the HBM. The preferred remedial action includes the following:

**Removal of all existing ACM and miscellaneous hazardous substances**, including removal of all ACM, LBP, PCB-containing fixtures, and mercury-containing fixtures prior to renovation. The abatement will include the asbestos-containing flooring (i.e., tile, vinyl, linoleum, and mastic), thermal systems insulation, leveling compound, and the stucco exterior on the central portion of the school building, as well as all PCB- and mercury-containing light bulbs and fixtures. All abated HBM will be transported off-site and disposed of at the Columbia Ridge Landfill in Arlington, Oregon. LBP will be encapsulated (i.e., painted over with a lead encapsulant paint for the purpose of lead dust/chipping mitigation), which is a common remediation technique for LBP and is generally safer for site workers than LBP abatement when the building is not being demolished.

**b. Description of Tasks, Activities, and Outputs**

**i-iv. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs (3.b.i - 3.b.iv)**

Table 9. Tasks and Activities	
<b>Task 1 – Project Management</b>	
i.	Sentry Corp will be responsible for overall project execution and management. Sentry Corp will manage project tasks, monitor schedule and budget in coordination with City of Condon, report on project activities and accomplishments to stakeholders, and procure a qualified environmental professional (QEP) in compliance with state regulations and 2 Code of Federal Regulations 200.317-326, which will support reporting and develop a final closeout report to document all project activities. Sentry Corp, the City, and other team members will meet monthly during the planning and cleanup stages. One Sentry Corp staff member will attend 1 national brownfields conference and two Sentry Corp staff members will attend one state or regional conference.
ii.	Anticipated Project Schedule: QEP to be procured June–July 2024; remaining work will take place October 1, 2024, to September 30, 2026.
iii.	Lead: Sentry Corp, assist: City of Condon, QEP
iv.	Outputs: 18 project team meeting minutes, 6 quarterly reports, 2 disadvantaged business enterprise reports, 2 federal financial reports, 1 final summary report, attendance at 1 national brownfields conference, attendance at 2 state or regional brownfields conferences, 6 quarterly Assessment, Cleanup and Redevelopment Exchange System (ACRES) updates.
<b>Task 2 – Community Outreach</b>	
i.	Sentry Corp will work closely with area residents, project partners, and other stakeholders throughout the project. Sentry Corp will develop a public involvement plan and conduct 3 community meetings at key project milestones (before, during, after cleanup); conduct direct

**Table 9. Tasks and Activities**

- outreach to impacted neighbors, especially underserved communities; establish a website and online information repository; and communicate project information through newspapers, newsletters, social media, email, and website. The QEP will provide a community involvement specialist to support Sentry Corp with community meetings, articles/press, and direct outreach. Community meetings and outreach will continue beyond completion of cleanup to provide additional opportunities for engagement. Up to 20 hours of interpretation and translation will be provided for community outreach.

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- ii. Schedule: October 1, 2024, to September 30, 2026, with key public meetings in October 2024, July 2024 (during cleanup), and October 2024. Other meetings as needed.

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- iii. Lead: Sentry Corp, assist: City of Condon, QEP

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- iv. Outputs: 1 PIP, 3 community meetings and notes/attendance/recordings, website and online information repository, 6 press releases or newspaper/web articles and social media posts, and direct community outreach as needed.

**Task 3 – Cleanup Planning**

- i. Activities include finalizing the ABCA and obtaining approval from the EPA project manager; holding an ABCA 30-day public review and comment period; preparing a work plan for abatement, a quality assurance project plan (QAPP), a health and safety plan (HASP), and sampling and analysis plan (SAP); plan negotiations and receiving regulatory approvals and completing 100% design documents; preparing bid documents for soliciting cleanup contractors; and providing bidding process support.

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- ii. Schedule: October 1, 2024, to October 2025.

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- iii. Lead: Sentry Corp, assist: City of Condon, QEP

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- iv. Outputs: 1 ABCA, 1 work plan, 1 HASP, 1 QAPP, 1 SAP, 100% design documents, 1 set of bid documents.

**Task 4 – Site Cleanup**

- i. Sentry Corp will use most grant funds requested for site cleanup. It will competitively procure a remediation contractor in compliance with state regulations and 2 Code of Federal Regulations 200.317-326, which the Sentry Corp project manager will oversee with QEP assistance. Contractor cleanup activities will include abatement of HBM. The QEP will work with Sentry Corp to ensure cleanup meets state and City regulations.

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- i. Schedule: June 1, 2024, to September 30, 2026.

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- ii. Lead: Sentry Corp, assist: City of Condon, QEP

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- iii. Outputs: 1 closeout report prepared to request certificate of completion from DEQ.

**c. Cost Estimates**

Table 10. Project Budget	Project Tasks				Total
	1. Project Management	2. Community Outreach	3. Cleanup Planning	4. Site Cleanup	
<b>Direct Costs</b>					
Travel	\$6,180	--	--	--	\$6,180
Contractual	\$7,800	\$15,750	\$33,750	\$58,970	\$116,270
Construction	--	--	--	\$653,030	\$653,030
Other (DEQ Oversight)	--	--	--	\$4,520	\$4,520
<b>Total Direct Costs</b>	<b>\$13,980</b>	<b>\$15,750</b>	<b>\$33,750</b>	<b>\$716,520</b>	<b>\$780,000</b>
<b>Total Indirect Costs</b>	--	--	--	--	--
<b>Total Budget</b>	<b>\$13,980</b>	<b>\$15,750</b>	<b>\$33,750</b>	<b>\$716,520</b>	<b>\$780,000</b>

Note -- = no costs in category.

**Table 11. Development of Cost Estimates**

Task	Cost Basis and Assumptions
1. Project Management	<p><u>Travel Costs for Sentry Corp staff: \$6,180</u>                      National brownfields conference (1 conference × 1 person × \$5,220/person = \$5,220)                      State brownfields conference (1 conference × 2 people × \$480/person = \$960)  <u>Contractual Costs: \$7,800</u>                      18 project team meetings (18 × \$150/hr × 1 hr = \$2,700)                      6 quarterly reports (6 × \$150/hr × 2 hrs = \$1,800); 2 disadvantaged business enterprise reports and 2 FFR reports (2 × \$150/hr × 2 hrs = \$600)                      1 final summary report (12 hrs × \$150/hr = \$1,800); 6 quarterly ACRES updates (6 × \$150/hr × 1 hr = \$900)</p>
2. Community Outreach	<p><u>Contractual Costs: \$15,750</u>                      Public involvement plan (12 hrs × \$150/hr = \$1,800); community outreach meetings (3 × \$150/hr × 8 hrs = \$3,600); articles/media updates (6 × \$150/hr × 1.5 hrs = \$1,350); direct outreach and engagement with impacted neighboring underserved communities (22 hrs × \$150/hr = \$3,300); website updates (15 hrs × \$150/hr = \$2,250); interpretation and translation (23 hrs × \$150/hr = \$3,450).</p>
3. Cleanup Planning	<p><u>Contractual Costs: \$33,750</u>                      Develop remedial action work plan, including coordination for agency review and incorporating comments (55 hrs × \$150/hr = \$8,250); HASP (10 hrs × \$150/hr = \$1,500); QAPP (60 hrs × \$150/hr = \$9,000); complete remedial action plans and specifications (60 hrs × \$150/hr = \$9,000); develop bid documents for site cleanup activities, communicate with potential contractors, evaluate bids, call references, coordinate pre-bid onsite meeting, and select contractors (40 hrs × \$150/hr = \$6,000).</p>
4. Site Cleanup	<p><u>Contractual Costs: \$58,970</u>                      Oversight of abatement contractor by QEP (303 hrs × \$150/hr = \$45,450); prepare 1 final project closeout report (60 hrs × \$150/hr = \$9,000); state DEQ oversight of cleanup [cost provided by DEQ = \$4,520].  <u>Construction Costs: \$653,030</u>                      Abatement contractor (cost estimate of \$653,030).</p>
<b>Notes</b>	<p>HASP = health and safety plan. QEP = qualified environmental professional.                      ACRES = Assessment, Cleanup and Redevelopment Exchange System. hr = hour.                      QAPP = quality assurance project plan. Sentry Corp = Port of Arlington Environmental Sentry Corp.                      FFR = federal financial report.</p>

**d. Plan to Measure and Evaluate Environmental Progress and Results**

A remedial action work plan with a detailed schedule of milestones and actions will be prepared to describe the approach and methods that will be used to abate HBM at the Site. This work plan will give descriptions of the project, project organization and responsibilities of key project staff and contractors, remedial action objectives, remedial action activities, and recording and reporting requirements. The work plan will include a HASP and a SAP/QAPP defining sampling and quality assurance protocols, such as perimeter and clearance air monitoring, to adhere to during abatement.

Sentry Corp will track and evaluate progress monthly, in coordination with the QEP and abatement contractor. Sentry Corp will measure results quarterly with published progress reports and in the EPA ACRES database. Measurement will compare output and outcome goals to quarterly achievements, so that deviations can be identified and corrected as soon as they occur.

**Environmental Cleanup Results:** The anticipated short-term cleanup results or outcomes for the project will be documented and include (1) the quantity of HBM removed from the building and disposed of in a regulated manner, (2) compliance with state air quality guidelines during all abatement activities to minimize exposure risk, (3) the ability to evaluate reuse or demolition of the building without concern for environmental health risk associated with hazardous materials.

**Redevelopment Outcomes:** The eventual long-term redevelopment outcomes that will be tracked and measured include (1) number of housing units that are made available through the reuse of the former school facilities (2) acres of land made available for redevelopment either along with school reuse or after demolition of the structures on site as determined by a reuse evaluation, (3) dollars of public and private funding leveraged.

All outputs and outcomes completed during and after the three-year grant period will be reported and updated in ACRES.

#### **4. Programmatic Capability and Past Performance**

##### **a. Programmatic Capability, i. Organizational Structure, ii. Description of Key Staff**

The cleanup grant will be administered by Sentry Corp with implementation support from the procured QEP and the City of Condon. Both Sentry Corp and the City are experienced in grant administration and are familiar with the procedures needed to successfully expend EPA funds in a timely and accurate manner. This includes technical, administrative, financial, reporting, and management requirements. Sentry Corp will manage the daily grant activities, plan and implement cleanup activities, lead community engagement, and contract and manage the QEP and the abatement contractor. Upon receiving the grant award, Sentry Corp may opt to hire an additional outside contractor to assist with financial management and reporting to the EPA; if it does not opt to do so, it will also oversee this portion. The City of Condon will assist in day-to-day management and community engagement efforts. Key grant staff are Project Manager Jed Crowther, the executive director of Sentry Corp. Jed has almost 20 years of experience in grant management and will be in charge of grant management, including reporting and coordinating with the City and QEP, supervising the QEP and contractor, and supervising outreach. He will coordinate closely with the City and Kayla Rayburn, Sentry Corp budget officer and administrative assistant. Kayla will be responsible for budget preparation; developing reimbursement requests; hosting board meetings and other outreach events, compiling feedback; and ensuring compliance with reporting and financial requirements. She has in-depth experience with Sentry Corp activities and financials. The Sentry Corp staff will work with the QEP to ensure all required periodic reporting and ACRES updates are completed correctly and on time.

##### **Acquiring Additional Resources**

Sentry Corp has efficient and EPA-compliant procurement processes in place that can be utilized in the event that additional resources are needed. Sentry Corp policies assure ample outreach to hire qualified labor and to alert the community to potential employment opportunities.

##### **b. Past Performance and Accomplishments**

##### **ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Nonfederal Assistance Agreements**

###### **(1) Purpose and Accomplishments**

Sentry Corp has successfully managed four grants since 2022 and managed the brownfield cleanup of a former air station in 2012. Sentry Corp successfully received over \$1,000,000 in funding in the last year (Table 2) and is adept in brownfield sites and community-oriented projects. Grants received include a \$50,000 award by Business Oregon for a strategic business plan; a \$50,000 award by Business Oregon for technical assistance; a \$12,000 award by Gilliam County for building improvements; and a \$15,000 award by Gilliam County for the Marina Walkway as well as the two sources of secured funding mentioned in Table 2, the Gilliam County Redevelopment Grant and the Avangrid Contribution Award totaling more than \$948,000. Although some of these grants have been smaller in size and management requirements, Sentry Corp and Jed Crowther have been consistently successful in managing the funds and allocating them appropriately. In addition, while Sentry Corp has only just begun to manage such grants, Jed Crowther, the executive director, has over 20 years of previous experience and has managed grants of similar sizes in other positions. These include grants from EPA, the U.S. Department of Agriculture, the U.S. Department of Transportation, and the U.S. Bureau of Reclamation.

###### **(2) Compliance with Grant Requirements**

Within the past year, Sentry Corp has successfully managed, drawn down, and complied with the terms and conditions, and schedules for over \$1,000,000 of county and state funding. Sentry Corp has submitted all quarterly and other required reports in a timely manner and is on track to complete these grants on schedule, following all rules and regulations.

# ATTACHMENT 2

## THRESHOLD CRITERIA RESPONSES



## **Condon Grade School EPA Brownfields Cleanup Site**

### **III.B. Threshold Criteria for Cleanup Grants**

#### **1. Applicant Eligibility**

The Port of Arlington Environmental Sentry Corp (Sentry Corp) is eligible to apply for a U.S. Environmental Protection Agency (EPA) Brownfields cleanup grant as a 501(c)(3) nonprofit organization. Documentation demonstrating Sentry Corp's tax-exempt status under Section 501(c)(3) of the Internal Revenue Code is attached.

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

The Former Condon Grade School Site has not received funding from a previously awarded EPA Brownfields cleanup grant.

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

Sentry Corp affirms that it does not have an open EPA Brownfields multipurpose grant.

#### **4. Site Ownership**

Sentry Corp is currently the owner of the former Condon Grade School site located in Condon, Oregon (the Site). The Site has been owned by Sentry Corp since April 26, 2023. Sentry Corp affirms that, if awarded cleanup grant funds, it will retain ownership of the Site for the duration of time in which Brownfields cleanup grant funds are disbursed for the cleanup of the Site.

#### **5. Basic Site Information**

- a) Site Name: Former Condon Grade School Site
- b) Address: 220 South East Street, Condon, Oregon, 97823

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

##### **a) Whether this site is contaminated by hazardous substances or petroleum**

The buildings at the Site are contaminated with hazardous substances (including asbestos- and lead-containing materials and fixtures containing mercury or polychlorinated biphenyls [PCBs]) No known releases of these hazardous substances have occurred at the Site, as they are contained within hazardous building materials used to construct the Site buildings). There is no known petroleum contamination at the Site.

##### **b) The operational history and current use(s) of the Site:**

The Site (i.e., the Condon Grade School) was used as a school for just over one hundred years. The Condon School District recently constructed a new elementary school at a separate campus in 2021, and the Site has been vacant since the old school was closed at the end of the 2021-2022 school year. The Condon School District deeded the Property to the City of Condon in 2020. After Sentry Corp conducted all appropriate inquiries via completion of a Phase I environmental site assessment (ESA) in accordance with ASTM International Standard E1527-21 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, the Site was then deeded from the City of Condon to Sentry Corp.

c) Environmental concerns, if known, at the site: The known presence of hazardous building materials in Site buildings presents a risk to human health and the environment for all potential reuse options for the Site. The hazardous building materials will need to be abated and removed from the Site before any safe reuse of the Site can occur.

d) How the site became contaminated, and to the extent possible, describe the nature and extent of the contamination: Due to the age of construction of the former Condon Grade School (portions constructed between 1920 and 1966), the buildings were constructed with hazardous building materials commonly used during that time. Additionally, the continual use of the Site buildings for 100 years also has caused many of these hazardous materials to become damaged, cracked, or friable, which creates an even greater potential for exposure to future Site occupants or workers. In January and March 2022 and October 2023, hazardous building materials surveys conducted at the Site confirmed the presence of asbestos- and lead-containing building materials (e.g., floor tiles, pipe wrap, paint) and fixtures (e.g., lights, thermostats) containing mercury or PCBs. The hazardous building materials surveys identified over 24,000 square feet of asbestos-containing flooring; 9,000 square feet of asbestos-containing stucco exterior siding; 10,000 square feet of asbestos-containing HVAC duct insulation tape; as well as other materials containing asbestos, lead, mercury, or PCBs that will require proper abatement and disposal. The surveys were conducted by certified Asbestos Hazard Emergency Act (AHERA) building inspectors.

## **7. Brownfield Site Definition**

Sentry Corp affirms the Site meets the definition of a brownfield under CERCLA § 101(39) as described in Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k) and is not listed or proposed for listing on the National Priorities List; not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); and not subject to the jurisdiction, custody, or control of the U.S. government.

## **8. Environmental Assessment Required for Cleanup Grant Applications**

Prior to taking ownership of the Site, Sentry Corp completed all appropriate inquiries for CERCLA liability protections via the completion of a Phase I ESA in accordance with ASTM International Standard E1527-21. The Phase I ESA identified that both known and suspected hazardous substances (i.e., hazardous building materials containing asbestos, lead, mercury, or PCBs) were present in Site buildings. A Phase I ESA was also prepared for the Site in 2021, under the ownership of the City of Condon.

A Phase II ESA is an investigation that requires the collection and analysis of environmental and other media samples. The Phase II ESA (or equivalent investigations) conducted at the Site include hazardous building materials surveys (one report, to be reissued with subsequent update). These hazardous building materials surveys were conducted in general accordance with ASTM

E1903-19 *Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process* provides guidelines for conducting a Phase II ESA.

ESAs previously completed for the Site include the following:

- *Phase I Environmental Site Assessment, Condon Grade School, 220 S East Street, Condon Oregon.* Prepared for Port of Arlington Environmental Sentry Corp, by Maul Foster and Alongi, Inc. March 3, 2023.
- *Phase I Environmental Site Assessment, Condon Grade School, 220 S East Street, Condon Oregon.* Prepared for the City of Condon, by Maul Foster and Alongi, Inc. April 28, 2021.
- *Hazardous Building Materials Survey, Condon Grade School, 220 S. East Street, Condon, Oregon.* Prepared for City of Condon by Maul Foster & Alongi. February 2022. Updated for City of Condon in May 2022. Updated for Port of Arlington Environmental Sentry Corp in October 2023 (and to be issued as final in November 2023).

## **9. Site Characterization**

Sentry Corp affirms that the hazardous substances identified at the Site (i.e., the hazardous building materials) have been sufficiently characterized from the abovementioned ESAs completed to date for remediation work to begin on the Site.

The Site is not currently enrolled in the state voluntary response program, but according to the Oregon Department of Environmental Quality (DEQ), the Site is eligible for enrollment based on the ESAs previously conducted at the Site. Oregon DEQ does not require enrollment for cleanup sites that do not pose an imminent risk to human health or the environment. Due to the Site not being enrolled in the state voluntary program (and therefore not having DEQ oversight), DEQ cannot affirm that there is a sufficient level of site characterization for remediation work to begin. However, based on their review of the ESAs previously conducted at the Site, DEQ reports that sufficient site characterization has been performed for remediation work to begin. In addition, due to the nature of the hazardous building materials containing asbestos, DEQ's Asbestos Program will be notified prior to work beginning. The DEQ letter affirming this is attached.

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

Sentry Corp affirms there are no known ongoing or anticipated enforcement actions related to the Site.

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

The Sites does not require a property-specific determination in order to be eligible for funding.

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

**a) Property Ownership Eligibility – Hazardous Substance Sites**

i. Exemptions to CERCLA Liability

NA

ii. Exceptions to meeting the requirements for assertion of an affirmative defense to CERCLA liability.

NA

iii. Landowner protections from CERCLA liability

**Bona Fide Prospective Purchaser Liability Protection:**

- Sentry Corp acquired the Site after January 11, 2002. Sentry Corp acquired the Site on April 26, 2023.
- Prior to acquiring the Site, a Phase I ESA was prepared on behalf of Sentry Corp on March 3, 2023. The Phase I ESA was prepared in accordance with the requirements of the ASTM International Standard ASTM E1527-21 to support the Bona Fide Prospective Purchaser defense CERCLA § 101(4), as amended by the Superfund Amendments and Reauthorization Act of 1986 and the Small Business Liability Relief and Brownfields Revitalization Act of 2002, 42 U.S. Code §9601 et seq.).
- Previous ESAs completed prior to the Sentry Corp’s acquisition of the Site include a Phase I ESA prepared on behalf of the City on April 28, 2021, and a hazardous building materials survey report in May of 2022.
- An additional hazardous building materials survey was at the Site on behalf of Sentry Corp, after the school building became entirely vacant. Sentry Corp has received the results from this survey and the old hazardous building materials survey report will be updated and reissued in November 2023.
- Sentry Corp is not liable for any contamination at the Site. The contamination identified at the Site is a product of historical usage and building materials used to construct Site buildings. Sentry Corp acquired the Site long after the Site buildings were constructed with hazardous building materials. Sentry Corp acquired the Site after the Site became vacant and has not constructed any new structures, made any renovations, or demolished any structures at the Site since taking ownership; Sentry Corp has not disturbed or changed the condition of any hazardous building materials at the Site since taking ownership.
- Sentry Corp is seeking this grant funding to take the appropriate care and reasonable steps to address the hazardous building materials and prevent future exposure to the hazardous substances identified in those materials (i.e., proper abatement and off-Site disposal).
- Sentry Corp will comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls.

(a) Information on the Property Acquisition

**(i) how you acquired (or will acquire) ownership:**

The Site was deeded (i.e., transferred) to Sentry Corp.

**(ii) the date you acquired the property:**

April 26, 2023

**(iii) the nature of your ownership (fee simple) (note that you must have sole ownership of the site to be eligible for funding; unless EPA approves a different ownership arrangement):**

Sole ownership.

**(iv) the name and identity of the party from whom you acquired ownership (i.e., the transferor); and**

City of Condon.

**(v) all familial, contractual, corporate, or financial relationships or affiliations you have or had with all prior owners or operators (or other potentially responsible parties) of the property (including the person or entity from which you acquired the property).**

The applicant and the previous owner are both governing bodies of the community of Condon. There is an informal relationship between the two surrounding the Site; the previous owner (the City) will continue to be involved as a stakeholder.

**(b) Pre-Purchase Inquiry Describe any inquiry by you or others into the previous ownership, uses of the property, and environmental conditions conducted prior to taking ownership. Please include the items below in your description.**

**(i) The types of site assessments performed (e.g., ASTM E1527-21 Phase I), the dates of each assessment, and the entity for which they were performed (state whether the assessment was performed specifically for you, or if not, the name of the party that had the assessment performed and that party's relationship to you).**

Prepared for Sentry Corp:

- A Phase I ESA was prepared in accordance with ASTM International Standard E1527-21 for Sentry Corp on March 3, 2023.
- A hazardous building materials survey report was prepared in general accordance with ASTM International Standard ASTM E1903-19 for Sentry Corp, completed in October 2023 and to be updated and reissued in November 2023.

Prepared for previous Site owner:

- A Phase I ESA was prepared in accordance with Process (ASTM E1527-13)
- ASTM International Standard (ASTM E1527-13) for the City of Condon on April 28, 2021.
- A hazardous building materials survey report was prepared in general accordance with ASTM International Standard ASTM E1903-19 for the City of Condon on May 17, 2022.



**(ii) Who performed the AAI investigation or Phase I environmental site assessments and identify his/her qualifications to perform such work.**

Maul Foster and Alongi, Inc., performed all of the ESAs listed above; MFA staff are certified to perform these ESAs. Sarah Colee, a Project Environmental Scientist, managed each of the above-listed projects and has over eight years of experience in environmental consulting and seven years of experience in environmental due diligence for property acquisitions and has completed annual trainings for ASTM E-1527 Environmental Site Assessment for Commercial Real Estate. Sarah has experience conducting site assessments in accordance with ASTM E1903, and training in conducting Phase I ESAs in accordance with ASTM E1527-13 and ASTM E1527-21. Sarah also prepared the April 2021 Phase I ESA on behalf of the City of Condon and was an AHERA-accredited Asbestos Building Inspector at the time of that report.

The Phase I ESA investigation, prepared for Sentry Corp in March 2023, was conducted by Dana Domenighini, a Project Environmental Scientist; she has over eight years of experience in environmental consulting, is an AHERA-accredited Asbestos Building Inspector, and has completed annual trainings for ASTM E-1527 Environmental Site Assessment for Commercial Real Estate. Dana has experience conducting site assessments in accordance with ASTM E1903, and training in conducting Phase I ESAs in accordance with ASTM E1527-13 and ASTM E1527-21

The hazardous building material survey reports were completed by AHERA-accredited Asbestos Building Inspectors. The May 2022 surveys were conducted by and under supervision of Jackie McMaster (AHERA Certificate No. IR-21-8304B, no longer employed with Maul Foster and Alongi, Inc.). The October 2023 survey was conducted by and under supervision of Julie Pace (AHERA Certificate No. 187363); she is certified as both an AHERA Inspector and an AHERA Supervisor (AHERA Contractor Supervisor No. ORWA-S10504).

**(iii) If the original AAI investigation or Phase I environmental site assessment was conducted more than 180 days prior to the date you acquired the property, affirm that you conducted the appropriate updates in the original assessment within 180 days prior to your acquisition of the property to take advantage of the bona fide prospective purchaser provision.**

NA

**(c) Timing and/or Contribution Toward Hazardous Substances Disposal Identify whether all disposal of hazardous substances at the site occurred before you acquired the property and whether you caused or contributed to any release of hazardous substances at the site. Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.**

The buildings at the Site are contaminated with hazardous substances (including asbestos- and lead-containing materials and fixtures containing mercury or polychlorinated biphenyls [PCBs] No known releases of these hazardous substances have occurred at the Site, as they are contained within hazardous building materials used to construct the Site buildings). No disposal of

hazardous substances has occurred, and Sentry Corp affirms that there has been no arrangement for no arrangement or transportation of substances.

**(d) Post-Acquisition Uses Describe all uses of the property since you acquired ownership through the present, including any uses by persons or entities other than you. Please provide a timeline with the names of all current and prior users during the time of your ownership; the dates of all uses; the details of each use, including the rights or other reason pursuant to which the use was claimed or taken (e.g., lease, license, trespass); and your relationship to the current and prior users.**

The Site (i.e., the Condon Grade School) was used as a school for just over one hundred years, and the Site has been vacant since the old school was closed at the end of the 2021-2022 school year. There have been no other active uses since the closing and deeding to Sentry Corp on April 26, 2023.

**(e) Continuing Obligations Describe in detail the reasonable steps 21 you took with respect to hazardous substances found at the site to:**

**(i) stop any continuing releases;**

N/A. There is no known release of hazardous substances at the Site, as the hazardous substances identified at the Site are currently contained within the building materials used to construct the Site buildings.

**(ii) prevent any threatened future release; and**

Sentry Corp contracted Hazardous Building Materials Surveys to be conducted at the Site to determine the locations and types of hazardous substances contained within the building materials throughout Site buildings. The results of these surveys identified which hazardous building materials will require abatement to prevent any potential future release. Sentry Corp will contract the proper abatement and off-Site disposal of these hazardous building materials. Sentry Corp is pursuing this grant to be able to fund these abatement activities.

**(iii) prevent or limit exposure to any previously released hazardous substance.**

N/A. There has been no known release of hazardous substances at the Site, as the hazardous substances identified at the Site are currently contained within the building materials used to construct the Site buildings.

**Please confirm your commitment to:**

**(i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;**

Sentry Corp affirms that they will comply with any and all existing land use restrictions and regulations and will not impede on the effectiveness or integrity of institutional controls.

**(ii) assist and cooperate with those performing the cleanup and provide access to the property;**

Sentry Corp affirms that they will actively assist and cooperate with those contracted to perform the cleanup by providing access to the site and providing any information deemed necessary.

**(iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and**

Sentry Corp affirms that they will comply with all applicable information requests, administrative subpoenas, and comply with any legal requirements pursuant to the site.

**(iv) provide all legally required notices.**

Sentry Corp affirms that they will provide all legally required notices.

### **13. Cleanup Authority and Oversight Structure**

a) The Site will be remediated under the authority and direction of Sentry Corp. Sentry Corp will use its contractors to perform cleanup oversight activities and related services. The selected firm(s) will be procured in full compliance with the federal procurement provisions of 2 CFR 200.317 through 200.327. A draft analysis of brownfields cleanup alternatives (ABCA) or equivalent documents is attached as a part of this grant application. A detailed scope of work for cleanup activities will be developed based on the ABCA or equivalent results, previous ESA results, and upon notification of award of this grant. A remedial action work plan with a detailed schedule of milestones and actions will be prepared to describe the approach and methods that will be used to abate HBM at the Site. This work plan will give descriptions of the project, project organization and responsibilities of key project staff and contractors, remedial action objectives, remedial action activities, and recording and reporting requirements. The work plan will include a Health and Safety Plan, a Sampling and Analysis Plan and Quality Assurance Program Plan defining sampling and quality assurance protocols, such as perimeter and clearance air monitoring, to adhere to during abatement.

b) NA

### **14. Community Notification**

Sentry Corp provided the community an opportunity to comment on the proposed grant application and draft ABCA at a public meeting held on November 2, 2023. The meeting was held both in-person at the Veteran's Memorial Hall in Condon, Oregon, and virtually via Zoom Meeting. The meeting notice was published on October 18, 2023, through the Condon City Newspaper; the notice included the date, time, and location of the public meeting; where and when the public could access the draft grant application and draft ABCA; and how the public can provide comment. The draft grant application and draft ABCA were posted to both the Sentry Corp website and the City of Condon's website on October 27, 2023. All notifications stated that these documents were available for public review. Accommodations via zoom were included and there is a plan to include accommodations for limited English proficiency and community members with disabilities upon request. Community feedback indicated that there is general interest and investment in what happens to the property. Sentiments from the meeting involved questions around abatement, preservation of school buildings, and housing.

## **15. Named Contractors and Named Subrecipients**

Not applicable. Sentry Corp will select contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500.



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Eastern Region Bend Office  
475 NE Bellevue Drive, Suite 110  
Bend, OR 97701  
(541) 388-6146  
FAX (541) 388-8283  
TTY 711

November 8, 2023

Terri Griffith  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 155  
Mailstop: ECL-133  
Seattle, WA 98101

RE: FY2024 EPA Brownfield Cleanup Grant Application -Port of Arlington Environmental Sentry Corp

Dear Terri Griffith:

The Oregon Department of Environmental Quality is pleased to acknowledge the Cleanup Grant Application from the Port of Arlington Environmental Sentry Corp for the former Condon Grade School Property. This project is not currently enrolled in the state voluntary response program but is eligible for enrollment based on the information the applicant provided. Oregon DEQ does not require enrollment for cleanup sites that do not pose an imminent risk to human health or the environment. Due to the site not being enrolled in the state voluntary program (and therefore not having DEQ oversight), DEQ cannot affirm that there is a sufficient level of site characterization for remediation work to begin. However, the Port of Arlington Environmental Sentry Corp has provided DEQ with a November 2, 2023 email from a qualified environmental professional (as defined in 40 CFR 312.10) certifying the site has been adequately characterized, copies of 2021 and 2023 Phase I Environmental Site Assessments, a copy of the 2022 hazardous building assessment report, and a copy of the draft analysis of brownfield cleanup alternatives (ABCA). After a cursory review of the report, DEQ agrees sufficient site characterization has been performed for remediation work to begin. In addition, due the nature of the hazardous building materials containing asbestos, DEQ's Asbestos Program will be notified prior to work beginning.

The former Condon school is over 45,000-square feet and was used for over 100 years. Based on previous investigations, the school contains a variety of hazardous substances including asbestos, lead-based paint, mercury, and polychlorinated biphenyls (PCBs). Following construction of a new school, the former school closed in 2021. Future development plans include residential apartments, which will help address the significant housing shortage in rural eastern Oregon. A draft ABCA, dated October 25, 2023, was prepared to evaluate cleanup alternatives and is available for public review. The proposed cleanup consists of removal and disposal of all hazardous substances at a permitted landfill. The proposal considered effectiveness, long-term reliability, implementability, implementation risk, reasonableness of cost, climate change, and sustainability.

This cleanup grant will support the abatement and mitigation of hazardous substances in the former school to prepare the property for residential reuse.

DEQ encourages EPA to fund the \$780,000 Cleanup Grant application that will support rural residential development in eastern Oregon. Please contact Greg Svelund, DEQ Eastern Region Regional Solutions Center representative at 541-647-4194 with any questions.

Sincerely,

*Ann M. Farris*

Ann M. Farris  
Program Manager  
Cleanup, Emergency Response, and Hydrogeology Program, Eastern Region

enc

ecc Katie Daugherty, ER Brownfields Coordinator  
Greg Svelund, ER Brownfield Coordinator  
Rebecca Wells-Albers, HQ Brownfields Coordinator  
Margaret Olson, EPA R10 Project Officer  
Jed Crowther, Port of Arlington  
Seth Otto, Maul Foster & Alongi, Inc.  
Sarah Colee, Maul Foster & Alongi, Inc.