R04-16-C-009

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Recreation Director
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Grounds Superintendent
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December 17, 2015

Barbara Alfano, Brownfield Director
EPA Region 4
Atlanta Federal Center
61 Forsyth Street, S.W. 10th FL
Atlanta, GA 30303-8960

Dear Ms. Alfano,

Enclosed please find the Brownfield grant proposal for the hazardous material cleanup of the former rail yard which will assist in the redevelopment of the property for use as the Doodle Trail Head for our recently completed multi-use paved path for cyclists and pedestrians (Doodle Trail).

Below is the applicant identification information for our proposal.

If you have any questions, please feel free to contact me.

Sincerely,

Bruce Evilsizor
City Administrator

EPA Brownfield Cleanup Grant—Applicant Identification Information
December 17, 2015

A. Applicant Identification: City of Pickens
219 Pendleton Street
PO Box 217
Pickens, SC 29671

B. Applicant DUNS number: 051392801

C. Funding Requested:
i) Grant Type: Cleanup
ii) Federal Funds Requested: $127,000. The City of Pickens is not requesting a cost-share waiver.
iii) Contamination: Hazardous Substances

D. Location: City of Pickens, Pickens County, South Carolina

E. Property Information: City of Pickens Doodle Trail Head (former Pickens Rail Depot)
124 Railroad Street (aka 409 East Cedar Rock Street)
Pickens, SC 29671

F. Contacts:

i) Project Director:
Mr. Bruce Evilsizor
Administrator, City of Pickens
219 Pendleton Street
Pickens, SC 29671
864-898-8160
bevilsizor@pickenscity.com

ii) Highest Ranking Elected Official:
Mayor David Owens
City of Pickens
219 Pendleton Street
Pickens, SC 29671
864-878-6421
dowens@pickenscity.com

G. Date Submitted: December 17, 2015

H. Project Period: Approximately 1 year

I. Population
i) General Population: City of Pickens - 3,149
ii) Population of Target Area: NA

J. Other Factors Checklist: Attached

Appendix 3

Other Factors Checklist

Appendix 3
Cleanup Other Factors Checklist

Name of Applicant: City of Pickens, South Carolina

Please identify (with an ***x***) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	**Page #**
	None of the Other Factors are applicable.	
X	Community population is 10,000 or less.	Page 1
	Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
	Targeted brownfield sites are impacted by mine-scarred land.	
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	Page 8
	Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, **applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation** which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties.	
	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, **applicant must attach documentation.**	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

Narrative Proposal

City of Pickens, South Carolina

City of Pickens, South Carolina
Application to US EPA for Brownfields Hazardous Cleanup Grant
Doodle Trail Head Project (Former Rail Depot)
124 Railroad Street
Pickens, South Carolina

1. Community Need

1.a. Targeted Community and Brownfields

Targeted Community Description

The City of Pickens is situated at the foot of the Blue Ridge Mountains and is the county seat of Pickens County. The City is approximately 20 miles west of Greenville, South Carolina, 70 miles south of Asheville, North Carolina, and 143 miles northeast of Atlanta, Georgia. The 2013 population of Pickens was 3,149 according to the 2009-2013 American Community Survey 5-Year Estimates. The project area is in census tract 105.02 which is classified as a distressed census tract. Aging homes, commercial structures, and industrial facilities create blighted conditions, drastically reduce property values, and discourage property owners from maintaining and renovating their properties. According to the 2009-2013 American Community Survey 5-Year Estimates, 68.4% of homes in the City were constructed prior to 1980 and the median value of owner-occupied housing is significantly lower in the City ($86,400) compared to the County ($123,900), State ($137,400), and United States ($176,700).

Historically the City's economy was based upon manufacturing wood and textile products; however, their role today is minimal. This decline resulted in the abandonment of two rail lines, one of which has been repurposed into the Doodle Trail, a bright spot for the City. Today, the economy is based upon retail trade, governmental services and other service industries. Revitalization efforts are focused on recreational tourism, specialty retail, entrepreneurial businesses and light manufacturing and assembly.

Demographic Information

	Pickens, SC	Pickens County	South Carolina	National
Population	3,149[1]	119,483[1]	4,679,602[1]	311,536,594[1]
Unemployment (2013)	18.0%[1]	11.8%[1]	11.4%[1]	9.7%[1]
Unemployment (August 2015)	Not Available	6.1%[2]	6.0%[2]	5.3%[2]
% Women of Child Bearing Age (15-44 years old)	33.9%[1]	43.2%[1]	38.7%[1]	39.6%[1]
% Elderly (65 years and older)	16.3%[1]	15.5%[1]	14.2%[1]	13.4%[1]
% Children (0-17 years old)	25.0%[1]	20.1%[1]	23.1%[1]	23.7%[1]
Poverty Rate	28.4%[1]	18.9%[1]	18.1%[1]	11.3% [1]
Percent Minority	12.5%[1]	9.7%[1]	31.3%[1]	36.7%[1]
Median Household Income	$32,800[1]	$41,788[1]	$44,779[1]	$53,046[1]
Median Value of Owner-Occupied Housing	$86,400[1]	$123,900[1]	$137,400[1]	$176,700[1]

[1]Data are from the 2009 – 2013 American Community Survey and are available on American FactFinder at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_13_5YR_DP03&src=pt
[2]Data are from the Bureau of Labor Statistics and are available at www.bls.gov

Description of Brownfields

The 1.86 acre site was developed as a passenger train depot with railway yard and shipping warehouses as early as 1889. The warehouse operation expanded in 1930. A majority of the warehouse buildings reportedly burned down in the 1950s. The existing building and open shed were built in the 1960s and operated as a box car assembly operation until approximately 1982 under various entities including Golden Tye, National Railway Utilization Corporation (NRUC) and Emergent Group. After 1982, the facility provided repair services for the box cars until 1995, at which point, the operations were changed to railroad locomotive repair and refurbishing (Pickens Railroad Company). The latest railroad operation involved locomotive dismantling and diesel engine removal, undercarriage renovation, new diesel engine installation and repainting.

The City of Pickens purchased the facility in 2013 along with the 7.5 mile rail line. In 2015, the Doodle Trail, a multi-use asphalt trail, was constructed on the 7.5 mile rail line between the Cities of Pickens and Easley. The 1.86 acre rail depot site currently sits idle waiting for cleanup and redevelopment into a trail head for the Doodle Trail. The site is situated along State Route 8, a main route into the City of Pickens, located at the southeast corner of the historic downtown. The site buildings, which are a considered a blight in the community, are contaminated with asbestos containing materials (ACM) and is perceived as unsafe due to the appearance of the dilapidated buildings and the perceived environmental stigma associated with the site. The appearance and structural integrity of the building has only declined due to vacancy and will continue to decline if left in its current state. The roof and interior of the structure have declined to a point where they are becoming unstable and pose a safety and health risk to local residents and visitors to the Doodle Trail. While the City is taking precautions at the site to prevent asbestos exposure to the community, the declining structural integrity of the site building creates the potential for a release of asbestos into the nearby environment, therefore placing the targeted community at risk.

A preliminary Brownfields inventory consisting of an environmental database review, historical records review, and visual assessment, has identified more than ten other potential Brownfields sites in the community. The identified sites consist of approximately nine vacant or underutilized automotive service stations/filling stations, three vacant or underutilized commercial facilities, and two vacant industrial facilities, one being a former textile mill. These sites, all located in the downtown area and along the Doodle Trail, pose risks to community health and the environment and contribute to increased blight in the downtown area.

Cumulative Environmental Issues

Unfortunately, Pickens is home to the Sangamo-Weston Superfund Site. According to Scorecard (www.scorecard.org), an environmental pollution information site, the Sangamo-Weston Superfund Site is a 224-acre PCB-contaminated site where Sangamo manufactured PCB-containing electrical capacitors from 1955 to 1976. Sangamo notified EPA that during this time approximately 38,700 cubic yards of PCB waste were disposed of on the plant site and an undetermined amount was disposed of in seven satellite dump sites. Approximately 17,000 cubic yards of waste have been removed and are contained in an EPA-approved landfill on the plant property. EPA and SCDHEC detected PCBs in run-off leaving the site which has impacted tributaries of Twelve-Mile Creek and Lake Hartwell. Further studies have identified impacts to local water supplies and fish taken from Lake Hartwell, with fish-consumption advisories still in

effect. The site is still undergoing remedial actions and assessments and continues to be a concern of local residents.

1.b. Impacts on Targeted Community

Industrial facilities and chemical pollutants associated with the target community have disproportionately burdened disadvantaged segments of the population including low-income communities. The target community has a significantly higher percentage of families living in poverty (28.4%) than that of the County (18.9%), State (18.1%), and United States (11.3%). In our target area, families living in poverty are 120% more likely to be exposed to toxic chemical releases, and the target community ranked in the 80-90th percentile for dirtiest/worst counties in the United States for volatile organic compound emissions, carbon monoxide emissions, and added cancer risks from hazardous air pollutants (SCORECARD The Environmental Pollution Website, 2015).

According to the EPA's EJSCREEN: Environmental Justice Screening and Mapping Tool, (http://ejscreen.epa.gov), the target area ranks in the 67th percentile in the US for potential lead paint exposure and in the 95th percentile in the US for proximity to NPL sites. Lead paint exposure, typically associated with aging structures, poses increased risks to sensitive populations including children, especially those living in poverty. The target community has a higher percentage (25.0%) of children (0-17 years) than the County (20.1%), State (23.1%), and United States (23.7%). Of those children living in the target community, 45.5% are living in poverty (2009-2013 American Community Survey 5-Year Estimates). According to the most recent national blood lead data, children living in low-income families are eight times as likely to be lead poisoned as children in high-income families.

Being in a rural Appalachian area, the community has many substandard houses and buildings in similar condition to the site structures for which cleanup funds are being requested. Part of the City's revitalization effort involves setting a new standard for property upkeep and pride knowing that other property owners are more likely to improve their properties if the City sets a positive example. It also makes property code enforcement more effective if the City sets an example of how to maintain properties.

The dilapidated structures throughout the City only perpetuate the hopelessness some people have and this hopelessness results in poorer health conditions. Additionally, the lack of adequate recreational opportunities has had significant health impacts on local residents. A 2015 Pickens County Community Health Survey by SCDHEC shows the death rate in Pickens County is higher than South Carolina's death rate in chronic diseases such as heart disease, stroke, lung cancer, colorectal cancer and all cancers. The survey also shows that 36.96% of residents are overweight, 28.34% are obese and 22.49% are physically inactive.

1.c. Financial Need

Economic Conditions

Pickens is able to fund tourism-related activities via our Hospitality Tax (e.g. Doodle Trail) however for general operations and projects, Pickens does not have the ability to generate enough revenue to cleanup the railroad depot property utilizing local funds due to our small size, low property tax base, lack of high paying jobs, high poverty rate and high

unemployment. With the City's general obligation bond capacity being used to purchase police, fire, street, grounds, yard waste equipment/vehicles, there is simply not enough bonding capacity to assist with this project. Funds collected from the City sales tax is credited to all the property owners against their property tax bill, generating no revenue for the City. Because of the sales tax credit against the property tax, many residential properties do not pay a City property tax and the City is very limited by state law in how much the property tax millage can be raised. Along with the loss of textile mill jobs in the past, Techtronics Industries (Ryobi Products) announced that they will be closing their Pickens' facility in 2016 which will result in the loss of approximately 200 local jobs. Also, Pickens still feels the effect of the 2003 Carolina Investor/HomeGold financial scandal where 12,000 people lost $275 million including many local Pickens residents (it was based in the City of Pickens and has been described as the Enron of SC).

Economic Effects of Brownfields

As seen in the Demographic table, Pickens' economic data is substantially distressed more than the County, State and National levels resulting in lower tax revenues which barely cover basic services. The key indicator of our need may be that 1 in 4 people in Pickens live in poverty. The railroad line and rail depot property are no longer in service due to the closing of many textile mills and the closing of a factory that manufactured Singer sewing machine cabinets. One of the efforts of the Pickens Revitalization Association (PRA), a non-profit organization dedicated to the enhancement and preservation of sustainable growth in Pickens' historic downtown area, is to find useful and planned uses for the vacant buildings downtown and throughout the City. The PRA has made some progress in this effort but still has a long ways to go. The use of Brownfields cleanup funds to assist with redevelopment of the Doodle Trail Head will greatly advance the PRA's efforts.

2. Project Description and Feasibility of Success

2.a. Project Description

Existing Conditions

The former Pickens Rail Depot site is located in downtown Pickens at 124 Railroad Street. The property occupies a 1.86 acre parcel which was formerly developed as a passenger train depot with rail yard and shipping warehouses as early as 1889. Warehousing facilities on site were expanded in the 1930s. The existing building and former open shed were constructed in the 1960s and operated as a box car assembly operation until approximately 1982. After 1982, the facility provided repair services for box cars until 1995, at which point, the operations were changed to railroad locomotive repair and refurbishing until 2013, when the city of Pickens acquired the site. The facility has been vacant since.

In May of 2014, the Pickens Doodle-Line Rail-to-Trail Feasibility Study was completed for the partnership between the City of Easley and the City of Pickens. This study included the development of trail heads in each City with the Rail Depot property serving as the trail head for the City of Pickens. In 2015, the two Cities completed construction of the 7.5 mile Doodle Trail. In 2015, the City of Pickens completed a Trail Head design plan which included the eventual cleanup and demolition of the rail depot through the use of both public and private funding sources. In 2016, the City plans to extend the Doodle Trail to the southeast edge of the historic downtown area, construct restrooms, and develop greenspace, a plaza, educational

garden, and community space utilizing the subject property. The development of the Doodle Trail and Trail Head were also addressed in the City's Master Plan developed in 2012.

The mission of the Doodle Trail project is to:

1. *Offer a **safe route** for pedestrians and bicycle travel as a **transportation alternative**.*
2. *Provide **outdoor recreation** to residents and visitors.*
3. *Attract tourism and **stimulate the regional economy**, especially in the historic downtown.*
4. ***Attract and retain employers** and **new businesses** as well as their employees.*

Proposed Cleanup Plan

A Draft Analysis of Brownfields Cleanup Alternatives (Appendix F) was prepared for the subject property. Based upon effectiveness, implementability, and cost considerations, it was determined that pre-demolition removal/abatement of ACM is the best remediation procedure to address asbestos concerns on the subject property. This method addresses ACM liabilities, potential contaminant sources and potential limitations to future land use and brownfields redevelopment potential consistent with the City's goals and re-use planning.

Utilizing standard industry practices, abatement areas would be contained prior to the removal using polyethylene sheeting, controlled negative pressure conditions and/or other applicable measures to prevent asbestos fiber migration beyond the work zone. Some abatement procedures may require wet removals to further control potential spreading of damaged or friable asbestos and airborne particulates. During and following the abatement, ACM dust, particulates and other residual materials would be vacuumed and filtered out using a high efficiency particulate air (HEPA) filtration system.

ACM would be removed under an SCDHEC-approved permit and containerized for off-site landfill disposal as a special or regulated waste. The most common removal method is a "bag out" approach that uses labeling bags designed to contain ACM in manageable quantities. Leak-tight containers would be required if wet removals are performed. Landfill disposal authorizations would be secured prior to initiating abatement work. These authorizations are specific to the disposal facility.

ACM removal must be performed by a South Carolina-licensed abatement contractor. In addition, this work requires a 10 business day notification to the SCDHEC Asbestos Section and appropriate coordination with SCDHEC representatives, as needed, throughout the abatement project. An air monitoring program will be required for removal of friable or highly damaged ACM. Final clearance would be granted following a visual examination of the work area followed by receipt of acceptable air quality testing results for regulated ACM (RACM).

Lead-based paint waste, materials such as wood, brick and metal that are painted with lead-based paint, have been identified on site with concentrations of lead less than 5 mg/l. In the state of South Carolina, lead-based paint waste in commercial facilities may be disposed of in a Class III (Construction and Demolition Debris) Landfill if the lead concentration is less than 5 mg/l which is determined to be non-hazardous by using the Toxicity Characteristic Leaching Procedure (TCLP). Since the redevelopment plan for the site includes complete demolition of the onsite

structure, abatement or encapsulation of lead-based paint coated materials is not required provided that the paint is left intact on the substrate; therefore, it is not anticipated that additional funding(including brownfields grant funding) beyond planned demolition costs, will be required to address lead paint concerns. Lead paint concerns will, therefore, be addressed during demolition phases of the project which will utilize other leveraged funds. (Please see section V.B.2.c. Ability to Leverage)

2.b. Task Description and Budget Table

The following is a description of each task that will be conducted under this cleanup program:

Task 1 - Project Management

Project management will include participation in Brownfields Task Force meetings and conference calls, EPA quarterly reporting, MBE/WBE reporting, ACRES reporting, development of EPA workplans, final reporting, and other activities required to maintain compliance with EPA cooperative agreement terms and conditions. Project management costs are anticipated to be $10,000 and will be fully covered by a portion of the City's cost share.

Task 2 - Community Outreach & Education

We are budgeting $17,000 for expense related to community outreach and education. Community outreach and education activities will include community meetings with various community organizations and groups, including but not limited to the Pickens Revitalization Association, Senior Citizens of Pickens, Grow Pickens County, Pickens County Historical Society, Pickens High School, Pickens County Career and Technical Center, Pickens Rotary Club, and Pickens Women's Association. The City will select a qualified consultant to present at community meetings and events in order to provide updates on site cleanup activities. The consultant will assist the City with issuing public notices and newspaper articles to provide the community with updates on project progress. Community outreach efforts will also include the development of a Brownfields Task Force which will meet on a regular basis throughout the life of the project. The Brownfields Task Force will represent a wide array of community members and stakeholders. Additional members of the Brownfields Task Force will include the selected consultant and representatives from the South Carolina Department of Health and Environmental Control (SCDHEC) and EPA. Community Outreach and Education Activities will include the following:

- Public Involvement Plan outlining outreach and education activities ($2,500)
- Kick-off meeting and at least two presentations at community meetings (includes preparation of presentations) ($5,000) – These activities will be fully covered by a portion of the City's cost share
- Presentation at neighborhood school to educate the students on environmental aspects of the project ($2,000)
- Preparation, printing, and distribution of project brochure ($2,000)
- Public notices ($500)
- Travel for attendance at regional and national brownfields related training conferences/workshops ($5,000)

Task 3 - Cleanup Planning

Cleanup planning will include finalizing the ABCA, preparing a Quality Assurance Project Plan, preparing the Health & Safety Plan, and development of bid documents for site cleanup activities, evaluation of bids, and selection of contractors. Cleanup planning costs are anticipated to be $11,000 and will be fully covered by a portion of the City's cost share. Cleanup planning tasks include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review ($2,000)
- Preparation of Generic Quality Assurance Project Plan, Site Specific Quality Assurance Project Plan, and Health & Safety Plan ($4,000)
- Development of bid documents for site cleanup activities, evaluation of bids, and selection of contractors ($5,000)

Task 4 - Abatement Design & Site Cleanup

$115,000 is budgeted for actual site cleanup activities. This task includes contractor costs for the abatement design and permitting, asbestos removal/abatement, asbestos air monitoring, and clearance sampling, and closure reporting. Anticipated sub-tasks include:

- Abatement design and management ($8,500)
- Removal of asbestos containing material, mobilization, and site security ($72,000)
- Asbestos air monitoring, clearance sampling, and closure reporting ($34,500)

Plan for Tracking and Measuring Progress:

The City will track and document project outputs in quarterly progress reports, ACRES updates, and monthly Brownfields Task Force meetings/conference calls. Anticipated outcomes from this project include: a reduction in threats to safety, human health, and the environment through the removal of contamination and eventual demolition of the site structure; the development of the Doodle Trail Head, including a plaza, greenspace, restroom facilities, an educational garden, and other support structures; an increase in local property values; the creation of temporary remediation and construction jobs; increased tax revenue; and increases in public health and welfare through the creation of greenspace and outdoor recreation opportunities.

Budget Categories	**Project Tasks for Cleanup Grant**				
(programmatic costs only)	**Task1** Project Management	**Task 2** Community Outreach & Education	**Task 3** Cleanup Planning	**Task 4** Abatement Design & Site Cleanup	Total
Personnel	-	-	-	-	-
Fringe Benefits	-	-	-	-	-
Travel[1]	-	$5,000	-	-	$5,000
Equipment[2]	-	-	-	-	-
Supplies	-	$2,000	-	-	$2,000
Contractual	$10,000	$10,000	$11,000	$115,000	$146,000
Total Federal Funding (not to exceed $200,000)	-	$12,000	-	$115,000	$127,000
Cost Share[3]	$10,000	$5,000	$11,000	-	$26,000
Total Budget	$10,000	$17,000	$11,000	$115,000	**$153,000**

[1]Travel to brownfields-related training conferences is an acceptable use of these grant funds.
[2]EPA defines equipment as items that cost $5,000 or more with a useful like of more than one year. Items costing less than $5,000 are considered supplies.
[3]Applicant must include the cost share in the budget even if applying for a cost share waiver. If the applicant is successful and the cost share waiver is approved, it will be removed in pre-reward negotiation.

2.c. Ability to Leverage

The Pickens City Council passed a Resolution on December 7, 2015 to commit the 20% local match to the Brownfield project. The City will also provide in-kind services as much as practical. To assist with the redevelopment of the Rail Depot property into the Doodle Trail Head, Pickens has submitted letters of interest to apply for a South Carolina Recreational Trails Program grant and an Appalachian Regional Commission grant. Along with these grant funds for redevelopment, Pickens will utilize local funds generated from the Water/Sewer Utility Fund, Stormwater Fund, Hospitality Fund, General Fund and private fundraising.

In 2014, the City of Pickens completed the Town Creek Bike Park (TCBP for BMX biking) at the City's recreational facility utilizing a $400,000 Appalachian Regional Commission (ARC) grant, a $100,000 SC Recreational Trails Program (RTP) grant, and over $300,000 from a local Hospitality Tax Bond. Attached is (1) ARC Project Summary which describes the project scope, funding and outcomes, (2) Town Creek Bike Park Press Release, (3) Audited Financial Statement pages showing the expenditure of the ARC & RTP grant funds, and a ledger statement. For photos of the TCBP, see www.cityofpickens.com/tcbp. (Documentation of funding included in Appendix D)

3. Community Engagement and Partnerships

3.a. Plan for Involving Targeted Community and Other Stakeholders and Communicating Project Progress

The City of Pickens understands that active community participation is vital to the success of this project and future projects. The City has actively and successfully engaged the community and stakeholders throughout the Doodle Trail Project. Methods utilized by the City thus far include community meetings, visioning sessions/design charrettes, press releases, a Doodle Trail website, social media, informational brochures, a Doodle Trail Grand Opening ceremony, and the Annual Doodle Trail 5K Run (currently in its 3rd year). Documentation of community notification, comments received, responses to comments, and meeting notes are included in Appendix E. In addition to these methods, the City plans to utilize the following methods and tools to actively engage the community throughout project completion:

Development of a Public Involvement Plan

The City intends to develop a Public Involvement Plan to establish the groundwork and schedule for various community engagement activities to be utilized throughout the life of the project. This plan will take into consideration the effectiveness of community engagement activities in communicating with the community and project stakeholders.

Development of a Brownfields Task Force

The City will establish a Brownfields Task Force consisting of City staff and elected officials, members of the Pickens Revitalization Association, members of various community based organizations, private parties, community members, an environmental consultant, and members of the EPA and SCDHEC. The Task Force will be chaired by the City Administrator. The Task Force will be vital in communicating with the community and implementing community outreach activities as well as paving the way for potential future Brownfields Assessment and Cleanup projects. Meetings/conference calls will be held, at minimum, on a monthly basis with more if needed.

Public Meetings and Presentations

The City will host an initial "Kick-off Meeting" to inform the community of project initiation and anticipated project schedule. A minimum of two additional public meetings/presentations will be held throughout the life of the cleanup project to inform the community of project achievements and milestones. These meetings will also provide an opportunity for the community to voice their concerns regarding health, safety, and impacts on the targeted community. Technical staff will be on hand to provide insight into project progress and answer questions and concerns from local residents.

Educational Session for Students

The City intends to work with Pickens High School to host an educational session for local high school students. This educational session is intended to educate students on the various phases and requirements required to successfully assess and remediate sites similar to the project site. The goal of this activity is to promote environmental awareness and serve as an informational session for students who may be interested in pursuing a career in the various environmental disciplines.

Spreading the Word

In addition to the above mentioned methods, the City intends to spread the word to the community through various forms of media including, but not limited to, project brochures, website updates, social media, and press releases. The City understands that utilizing various multiple forms of media to engage the community is more effective in communicating with the community than relying on one method alone.

3.b. Partnerships with Government Agencies

The South Carolina Department of Health and Environmental Control, the State's environmental authority, fully supports the City of Pickens' application for a Brownfields Site Specific Cleanup Grant. The SCDHEC fully supports Pickens' efforts toward the cleanup and redevelopment of the site to benefit the community. If the grant is awarded, the SCDHEC has pledged to provide technical assistance to Pickens as it works to cleanup and redevelop Brownfields sites in their community. In addition to SCDHEC, the City's Brownfields Task Force will work with the City to provide guidance and oversight throughout the life of the cleanup and beyond. Representatives of the EPA and SCDHEC will be invited to serve on the City's Brownfields Task Force and will be consulted to provide technical input and review of all technical documents and cleanup activities associated with this project. (Support letter from the SCDHEC included in Appendix B)

In addition to support from SCDHEC, South Carolina Representative David R. Hiott, Chairman of the Agricultural, Natural Resources, and Environmental Affairs Committee, and State Senator Larry A. Martin have indicated their full support for the City’s efforts to cleanup and redevelop the Former Rail Depot property by incorporating Brownfields funding into the effort. (Support letters included in Appendix C)

3.c. Partnerships with Community Organizations

The City through its community outreach efforts and relationships established during prior phases of the Doodle Trail’s development has identified partners for our Brownfields redevelopment efforts of the Former Rail Depot site. Past community-wide project efforts have taught the City that community-based organizations are vital to a successful project. Letters of support including contact information for the following organizations are attached. (Appendix C)

Organization	Description	Support Role
Pickens Revitalization Association (PRA)	Focuses on business and community development.	Will assist with redevelopment plans of Trail Head, collection & distribution of information, fundraising and serve on the Brownfield Task Force
Pickens County Historical Society	Preservation & education of Pickens County history	Will help preservation and educational activities
Historic Old Pickens Foundation	Preservation of Old Pickens Court House	Will help with preservation and educational activities
Greater Pickens Chamber of Commerce	Improving the business climate and quality of life in the Pickens area	Will assist with the distribution of information and serve on the Brownfield Task Force
Pickens Innovation Center	Develop new entrepreneurs/promote a diversified economy	Will assist with distribution of information and redevelopment plans
Senior Citizens of Pickens	Manages the Hagood Community Center	Will help with educational activities
Visit Clemson	Promote Clemson area	Will help distribute cleanup and project information and assist with any fundraising efforts
Pendleton District Commission	Promote historic preservation and tourism in region	Will help with preservation and educational activities
Pickens Rotary	Community service organization	Has committed $20,000 for amenities along the Doodle Trail, will provide local support and distribute project information
Duke Energy Foundation	Provides community project grants	Will assist with environmental education efforts and distribution of project information
Preserving Our Southern Appalachian Music	Preserves & teaches Appalachian music skills	Will provide volunteers to support cleanup activities, help distribute cleanup and project information and assist with any fundraising efforts
Blue Ridge Electric Cooperative	Provides community project grants	Willing to help as needed

4. Project Benefits

4.a. Health and/or Welfare and Environment

Health and/or Welfare Benefits

The City of Pickens is committed to improving the health of local residents by promoting active lifestyles and encouraging outdoor recreation. The use of Brownfields cleanup funding will allow the City to further develop the Doodle Trail and create a much needed "gateway" to the trail. According to the 2014 Greenville Health System Swamp Rabbit Trail 3-Year Impact Study completed by Furman University, efforts to create trails such as the Swamp Rabbit Trail, located in nearby Greenville, South Carolina, have been successful in promoting and encouraging physical activity. The CDC's Task Force on Community Preventive Services (www.thecommunityguide.org) recommended that efforts aimed at promoting walking and bicycling should include access to trails to encourage physical activity, and identified trails as integral infrastructure for physical activity. The Doodle Trail is an integral component in the City's efforts to encourage healthy, active lifestyles and thus alleviate poor health conditions and weight concerns identified in the aforementioned 2015 Pickens County Community Health Survey.

In addition to improving the health of the community through this project, the City of Pickens wishes to use the redevelopment of the subject property to set a positive example of property upkeep. The subject property is an example of one of many blighted properties in the City of Pickens. The City hopes to utilize the redevelopment of the subject property to educate property owners and local business owners on the appropriate methods and procedures for assessing and remediating potentially contaminated properties in order to reduce the blight and environmental stigma plaguing redevelopment efforts in the City. Educating the community and encouraging proper environmental assessment and remediation will also reduce the chances of uninformed persons creating new environmental problems or exacerbating current problems.

Environmental Benefits

Along with the health benefits of the asbestos abatement and the removal of safety hazards associated with the dilapidated building, the City and community partners will help set an example in the community for cleaning up properties, promoting greenspace, implementing best practices on water usage and storm water management, and involvement in healthy activities. The City hopes to utilize solar electric panels to power the planned restroom facilities; however, more planning is required to determine if this is a feasible option. The project will give the City experience in environmental cleanup and redevelopment using energy and environmental best practices which will assist with future Brownfields and non-Brownfields projects in the community.

4.b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

Policies, Planning, or Other Tools

Three examples of sustainable development practices to be utilized in the Trail Head project include:

1. Per the recently completed Trail Head Conceptual Plan by Alta Planning & Design, approximately 50% of the railroad building area will be converted into greenspace and approximately 50% of the Trail Head will be new greenspace.

2. As a member of the Anderson & Pickens Stormwater Partners (public service organization of Clemson University), the City is committed to providing best management practices for storm water management on the Trail Head (e.g. use of rain garden, greenspace, pavers, etc.).
3. The City is partnering with the SC Department of Transportation District 3 (SC DOT) to install pedestrian signals and crosswalks to allow a safe connection between the Trail Head and the downtown area. SC DOT will install the pedestrian signals/crosswalks in the first half of 2016 and the City will share in the cost of materials.

Integrating Equitable Development or Livability Principles

The Brownfield cleanup and redevelopment of the Trail Head and the connectivity to the downtown will help achieve the Sustainability Communities partnership by making improvements in the areas of public health, environmental quality, walkability, access & equity, sense of place and economic competitiveness. This year a new affordable housing project supported by the City did not receive federal tax credits in part because they did not have a recreational park within the neighborhood. The Doodle Trail Head will provide the required recreational space needed to receive these tax credits in the future.

4.c. Economic and Community Benefits (long-term benefits)

Economic or Other Benefits

According to the 2014 Greenville Health System Swamp Rabbit Trail 3-Year Impact Study completed by Furman University, approximately 10 jobs are created for every $1 million in investment bicycling infrastructure. The City has already invested $1 million in the Doodle Trail which equates to 10 new jobs and we anticipate spending $750,000 in the cleanup and redevelopment in Phase I of the Trail Head which equates to 7.5 new jobs. Also in the study, it was reported that consumers will pay a premium to reside in walkable communities with open space and that most open space will increase property values in the community which will increase the City's tax revenue. The study also reported that 25% of the trail users are tourists which should generate an average of $50 in business revenue per tourist.

Job Creation Potential: Partnerships with Workforce Development Programs

The City of Pickens takes pride in hiring and buying local whenever practical and this project will be no exception. As part of the City's procurement process, the City will encourage the selected contractor and subcontractors to hire local people and companies when possible (e.g. hauling companies, laborers). The City will also encourage the contractor & subcontractors to utilize the service of South Carolina Works to try and hire local people in the cleanup and redevelopment effort.

5. Programmatic Capability and Past Performance

5.a. Programmatic Capability

The Pickens City Administrator and Brownfields Project Director, **Mr. Bruce Evilsizor**, will be responsible for the timely and successful expenditure of funds and completion of all technical, administrative and financial requirements of the project. He will be assisted by **Ms. Sharon Hager**, the City's Finance Director. The City will procure and utilize a qualified environmental consultant to assist with the technical and reporting portions of the project. To select a qualified environmental consultant, the City will use our "Professional Service" procurement process.

Mr. Evilsizor has been involved in federal grants off and on since the early 1990's when he applied and administered a federal Community Oriented Policing (COP) grant for a School Resource Officer and COP More grant for in-car police computers. Since then, he has been responsible for Ohio EPA Brownfield grants, Federal Highway grants, Community Development Block Grants, Ohio Public Commission grants and Appalachian Regional Commission grants as an administrator in two cities. Mr. Evilsizor has a Masters Degree in Public Administration from the University of Dayton (Ohio) and over 30 years of local government experience. As the Director of Administration in Urbana, Ohio (2006-2011), Mr. Evilsizor worked with an environmental contractor (Hull & Associates in Dublin, Ohio) on two Brownfield projects through the Ohio EPA Brownfield Division. He attended at least two Ohio Brownfield Conferences which, in addition to his previous grant experience and MPA, were very helpful in preparing him to manage these two projects. In the first project, the City receive a $3 million Clean Ohio Revitalization Fund grant to help purchase, cleanup and redevelop a former paper mill (700 W Court St. Urbana, Ohio) to prepare for an end-user, Weidmann Electrical. The project subsequently received a No Further Action letter from the EPA and the property has been turned over to the Weidmann Electrical, the end user (it was in the City's name during cleanup). In the second project, Mr. Evilsizor again worked with Hull & Associates to complete a Phase I and Phase II on the former Q3 property (605 Miami St. Urbana, Ohio) using Clean Ohio funds. The Q3 property was a semi-abandoned manufacturing property. The City obtained a $265K Ohio Brownfield grant to conduct a Phase II with the hopes the City or other responsible user would redevelop it. Besides being semi-abandoned, the site was under enforcement action by the EPA for contaminating the aquifer and Brownfield personnel worked with others in the EPA to pursue the Brownfield option and get the property on the road to redevelopment. The property ended up being fully abandoned and the City of Urbana has taken ownership and recently received another grant for cleanup. In both projects, Mr. Evilsizor, the City and Hull & Associates worked very well with the Ohio EPA Brownfield personnel and had a good track record of being timely on their reporting and fiscally prudent with the funding.

Ms. Hager is very proficient in our Harris Local Government accounting software and our Wells Fargo Online Banking service--both are very useful in grant accountability. Ms. Hager has 10 years of local government experience and is very proficient in accounting, payroll, accounts payable, reporting and learning new processes.

5.b. Audit Findings

For at least the last three fiscal years, the City has received an "unmodified opinion" from the required state financial audits which is the best opinion the City can receive. For FY 14-15, the auditors noted a Finding for the City receiving a $73,000 overpayment from the County on a road tax (was found by the auditor). The overpayment resulted from the County's conversion to new computer software which inadvertently allocated and paid the County's road fees to the local municipalities. In response to this, the City has added additional general ledger revenue line items to breakdown the current 10-4150-4060 Property Tax account into the various components that make up the property tax line item in the financial statements. This will help in monitoring the revenue during monthly and quarterly reviews. For a single audit of **federal funds** for FY 14-15, the City received an "unmodified opinion" with no Federal Award Findings or Questioned Costs. This is the best opinion that the City can receive.

5.c. Past Performance and Accomplishments
Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

The City of Pickens has never received an EPA Brownfields Grant; however, the City has successfully acquired and managed other federal and non-federal assistance agreements. Current grants received by the City of Pickens include (1) $242,000 Community Development Block Grant for Ann Street Water Line Improvement project which is scheduled for construction in the Spring of 2016 and (2) $165,000 Appalachian Regional Commission Grant for the Auditorium Renovation project at the Pickens Hagood Community/Senior Center which is also scheduled for construction in the Spring of 2016. Grants completed by the City of Pickens in 2014/2015 include (1) $500,000 Community Development Block Grant for the Village Renaissance Sewer Improvement project which constructed and replaced 2,900 linear feet of sewer main with 35 residential connections (2) $400,000 Appalachian Regional Commission Grant for the Town Creek Bike Park and (3) $100,000 SC Recreational Trails Program Grant for the Town Creek Bike Park. The Town Creek Bike Park included the construction of 4,000 linear feet of a paved multi-use trail (named the Appalachian Lumber Greenway) and a 4,000 linear foot wooden/earthen BMX track for intermediate to advanced mountain bikers. The Town Creek Bike Park is improving the health of residents/visitors, increasing economic development, and improving the quality of life.

The City has an unblemished history of grant management and compliance. The City has met all reporting requirements, submitting acceptable reports to granting agencies through its financial office and the Appalachian Council of Governments.

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H NOT APPLICABLE

I NOT APPLICABLE

J NOT APPLICABLE

K NOT APPLICABLE

Attachment A.

Threshold Documentation

Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

a. Eligible Entity

The City of Pickens, South Carolina is eligible to apply for the EPA Brownfields Cleanup Grant as a local government as defined under 2 CFR 200.64.

b. Site Ownership

The City of Pickens affirms that it is the sole owner of the subject property.

2. Letter from the State or Tribal Environmental Authority

See attached letter (Appendix B) from the South Carolina Department of Health and Environmental Control (SCDHEC).

3. Site Eligibility and Property Ownership Eligibility

Site Eligibility

a. Basic Site Information

(a) Name: Former Rail Depot Property
(b) Address: 124 Railroad Street, Pickens, South Carolina
(c) Current Owner: City of Pickens
(d) Date of Acquisition: August 2, 2013

b. Status and History of Contamination at the Site

(a) The subject site is primarily contaminated with hazardous substances.
(b) The subject property was developed as a passenger train depot with rail yard and shipping warehouses as early as 1889. Warehousing facilities on site were expanded in the 1930s. The existing building and former open shed were constructed in the 1960s and operated as a box car assembly operation until approximately 1982 under various entities including Golden Tye, National Railway Utilization Corporation (NRUC), and Emergent Group. After 1982, the facility provided repair services for box cars until 1995, at which point, the Pickens Railway Company utilized the facility for railroad and locomotive repair and refurbishing until 2012 when the City of Pickens acquired the subject property. The site has been vacant since it was acquired by the City.
(c) Environmental concerns at the site include asbestos containing building materials and surfaces impacted by lead-containing paint as identified in an Asbestos and Lead-Containing Paint Survey dated November 2015.
(d) Current on-site facilities were constructed as early as the 1930s with various additions constructed as recently as 1982. During this period of time it was common

practice to utilize building materials and paints containing asbestos and lead. The November 2015 Asbestos and Lead-Containing Paint Survey identified asbestos and lead-containing paints throughout the structure. The identified contamination appears to be limited to structural materials and with no currently identifiable impacts to soil and groundwater.

c. Sites Ineligible for Funding

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

d. Sites Requiring a Property-Specific Determination

The site does not require a property-specific determination in order to be eligible for funding. The site a) is not subject to CERCLA planned or ongoing removal action; b) is not subject to any legal action, or regulated by a permit, under the Solid Waste Disposal Act (SWDA), Federal Water Pollution Control Act (WPCA), Toxic Substance Control Act (TSCA), or the Safe Drinking Water Act; c) is not subject to corrective action under the SWDA; d) does not contain a land disposal unit under subtitle C of SWDA; and e) has had no release of PCBs subject to TSCA and no release from USTs.

e. Environmental Assessment Required for Cleanup Proposals

A written ASTM 1903-11 equivalent Phase II site assessment report in the form of an Asbestos and Lead-Containing Paint Survey was completed in November 2015, prior to proposal submission.

Property Ownership Eligibility - Hazardous Substance Sites

f. CERCLA §107 Liability

The City is NOT potentially liable for contamination at the subject property under CERCLA §107. The City acquired the property on August 2, 2013 after performing a Phase I ESA in December 2012 and subsequent soil investigations in March, 2013 and May, 2013.

g. Enforcement or Other Actions

The City of Pickens is not aware of any ongoing or anticipated environmental enforcement actions related to the site for which funding is sought. The City is not aware of any inquiries or orders from federal, state, or local government entities regarding the

responsibility of any party (including the applicant) for the contamination or hazardous substances at the site, including any liens.

h. <u>Information on Liability and Defenses/Protections</u>

i) Information on the Property Acquisition

The City of Pickens and City of Easley jointly acquired the subject property via negotiated purchase from a private entity, Pickens Railway Company on August 2, 2013. The City of Easley transferred its stake of the property to the City of Pickens on June 26, 2014. The City of Pickens is currently the sole owner of the property and has fee simple title. The City of Pickens does not and never has had familial, contractual, corporate, or financial relationships or affiliations with prior owners, operators, and/or potentially responsible parties of the property, including Pickens Railway Company from whom the City acquired the property.

ii) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before the City acquired the site. The City did not cause or contribute to any release of hazardous substances at the site. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii) Pre-Purchase Inquiry

The City of Pickens and City of Easley jointly acquired the subject property from the Pickens Railway Company in 2013. Prior to the sale of the subject property, the Pickens Railway Company completed numerous assessment activities on behalf of the cities of Pickens and Easley. These assessment activities include a Phase I Environmental Site Assessment dated December 17, 2012, a subsequent Soil Investigation Report dated March 1, 2013, and a Soil Excavation Report, dated May 31, 2013, documenting the removal of an on-site AST, the excavation of stained surface soils.

The December 2012 Phase I ESA completed by Mr. Craig Eady of Terracon Consultants, Inc. (Terracon). Mr. Eady, a licensed Professional Geologist with over 25 years' experience, meets the definition of Environmental Professional as defined by AAI and has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. The Phase I ESA identified several recognized environmental concerns including the historical use of the site for repairs and maintenance of locomotives and a release associated with a diesel AST. Based on the findings, Terracon recommended soil assessment be conducted in the identified areas of concerns.

In response to the recommendations of the December 2012 Phase I ESA, Mr. Eady of Terracon was contracted to complete soil investigation activities at the site. These activities were summarized in a Soil Investigation Report dated March 1, 2013. The soil investigation included the collection and laboratory analysis of soil samples from four soil borings located in the identified areas of concern. Analytical results indicated that no volatile organic compounds (VOCs) or polycyclic aromatic hydrocarbons (PAHs) were detected above their method detection limits and several metal constituents were detected at concentrations well below their respective industrial and residential Regional Screening Levels (RSLs). Terracon recommended no further assessment was required at the time; however, the removal of the diesel AST and the excavation of 3 feet of the underlying soils were recommended.

Based on the recommendations of the March 2013 Soil Investigation Report, Mr. Eady of Terracon was contracted to oversee the removal of the on-site diesel AST and the excavation of approximately 3 feet of underlying soils. Soil excavation activities were summarized in a Soil Excavation Letter report dated May 31, 2013. In this report, Terracon concluded that the diesel impacted soil was removed and properly disposed, and the residual soil from the excavation did not exhibit indications of diesel impacts. As a result, Terracon stated that no additional actions were warranted.

Upon completion of site assessment activities, the City of Pickens and the City of Easley jointly purchased the subject property from the Pickens Railway Company on August 2, 2013 as part of a Rails-to-Trails partnership. In June 2014, the City of Easley transferred its stake in the property to the City of Pickens for $1.

Post-acquisition assessment activities have identified on-site asbestos and lead paint concerns to which the City of Pickens has not contributed.

iv) Post-Acquisition Uses

The site is currently vacant and not in use. There are no applicable current or prior users during the time of ownership by the City.

v) Continuing Obligations

The City will exercise specific appropriate care with hazardous substances found at the site by taking reasonable steps to stop any continuing releases, prevent any threatened future release, and prevent or limit exposure to any previously released hazardous substance. In addition to the pre-purchase inquiry completed prior to acquiring the subject property, the City completed an updated Phase I Environmental Site Assessment and Asbestos and Lead-Containing Paint Survey that indicated that there are, with two exceptions, no known continuing releases, threatened future releases, or previously released hazardous substances on the subject property. The exceptions are the release of asbestos or lead from on-site

structural materials which could be released to the environment by weather, building degradation, fire, vandalism, or various other means. The City intends to utilize Cleanup grant funds to abate asbestos containing materials from the subject property, thus fulfilling their continuing obligations in regards to current, past, and future releases of known hazardous substances found at the site. The SCDHEC regulations require that painted demolition debris with a lead concentration greater than 0.06% by weight or 0.7 milligrams per square centimeter (mg/cm2) be disposed in a permitted Class II or Class III landfill. Paint systems were observed to be in good condition during the Asbestos and Lead-Containing Paint Survey performed by Terracon. Since the redevelopment plan for the site includes complete demolition of the onsite structure it is not a requirement to abate or encapsulate the LBP-coated materials provided that the paint is left intact on the substrate. Additional costs beyond anticipated demolition costs are not anticipated to address lead-containing paint at the site. Therefore, although lead containing paint is present on the site, it is not considered to be a contaminant of concern and Brownfields funding will not be utilized to address these concerns.

The City confirms its commitment to comply with all land use restrictions, assist and cooperate with those performing the cleanup and provide access to the property, comply with all information requests and administrative subpoenas that have or may be issued in connection with the property, and provide legally required notices.

4. Cleanup Authority and Oversight Structure

a. <u>Cleanup Oversight</u>

The South Carolina Department of Health and Environmental Control (SCDHEC) Voluntary Cleanup Program (VCP) does not typically address asbestos and lead paint concerns; therefore, the site will not be enrolling in the SCDHEC VCP. The SCDHEC Bureau of Air - Asbestos Section typically does not require a technical review of plans, reports, and activities associated with asbestos abatement projects; however, the department has agreed to provide review and comment as necessary to ensure the cleanup is protective of human health and the environment. If necessary, US EPA will also be consulted in order to ensure that the cleanup is protective of human health and the environment.

The City of Pickens will also hire a qualified environmental consultant prior to implementing remediation activities at the subject property. The City will comply with competitive procurement provisions of 2 CFR 200.317 through 200.326 for contracting the qualified environmental consultant. The consultant will provide the technical expertise required to conduct, manage, and oversee the cleanup, ensuring the adherence to applicable state and federal regulations and requirements.

b. Access to Adjacent Properties

The subject property is accessible on all sides from public roads, with the exception of the eastern property boundary. Based on the nature and location of the identified contamination on the subject property, it is not anticipated that neighboring property access will be necessary to conduct cleanup activities, perform confirmation sampling, or monitor offsite migration of contamination; however, if neighboring property access is necessary for proposed cleanup activities, the City has a good working relationship with neighboring property owners and can secure access to neighboring properties if needed.

5. Statutory Cost Share

i) Meet Required Cost Share

The City passed a resolution on December 7, 2015 committing $26,000 in funding from the City's General Fund in order to meet the required 20% cost share. A copy of this resolution is included in Appendix D.

ii) Hardship Waiver

The City of Pickens is not requesting a hardship waiver.

6. Community Notification

The City of Pickens understands that community engagement is vital to the success of any Brownfields program. The City understands that Brownfields assessment and cleanup projects cannot reach their full potential without active community support and involvement. The City intends to redevelop the property for use as a trailhead for the on-going Doodle Trail project by incorporating greenspace, a plaza, an outdoor center, educational garden, and support facilities including an information center and restrooms. Throughout the life of the Doodle Trail project, the City has effectively demonstrated their ability to engage the community and encourage community involvement.

The City published an ad in the *Pickens County Courier* on November 25, 2015 (the *Courie*r also published a detailed article on the grant application) and provided electronic notification through their website on November 30, 2015. These advertisements were intended to notify the community and stakeholders that the draft Analysis of Brownfields Cleanup Alternatives (ABCA) and the draft grant proposal were made available for review and public comment on the City's website (www.cityofpickens.com) and at the Pickens City Hall on Thursday, December 3, 2015 through December 17, 2015. Additionally, this advertisement was intended to notify the community of a public meeting held on December 14, 2015 at 3:00 p.m. in the City Hall Council Chambers to discuss and solicit public comments on the grant proposal and draft ABCA, to educate the community on the US EPA Brownfields Program, and to discuss the proposed used of funds.

A copy of the draft ABCA, newspaper ad and website posting that demonstrate notification to the public and solicitation of public comments, the comments received and corresponding responses, public meeting attendance sheets, and a summary from the public meeting held on December 14, 2015 are included as attachments. Documentation of Community Notification is included in Appendix E and the Draft ABCA is included in Appendix F.

Attachment B.

Letter From State Environmental Authority

D H E C
PROMOTE PROTECT PROSPER
Catherine E. Heigel, Director
Promoting and protecting the health of the public and the environment

December 2, 2015

Bruce Evilsizor, City Administrator
City of Pickens
219 Pendleton Street
Pickens, SC 29671

RE: EPA Brownfields Grant Site Specific Cleanup Grant Application
City of Pickens - Pickens Rail Depot Site

Dear Mr. Evilsizor:

The South Carolina Department of Health and Environmental control, the State's environmental authority, fully supports the City of Pickens' (Pickens) application for a Brownfields Site Specific Cleanup Grant.

Pickens plan is to redevelop the former railroad depot into the trailhead for the Doodle Trail, a recently opened rails-to-trail partnership with the City of Easley. The proposed reuse as greenspace/trails provides much needed outdoor recreation facilities. We support Pickens' efforts toward the cleanup and redevelopment to benefit the community. If the grant is awarded, the Department will provide technical assistance to Pickens as it works to cleanup and redevelop Brownfields sites in their community.

The Department appreciates EPA's consideration of the application and hopes for a favorable outcome that will assist Pickens in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

Daphne Neel

Daphne Neel, Chief
Bureau of Land and Waste Management
Environmental Quality Control

cc: EPA Region 4
Susan Turner, Director, EQC Upstate Region
Robert Hodges, Manager, Brownfields Program

Attachment C.

Letters of Commitment

Community Based Organizations

1. Pickens Revitalization Association
2. Pickens County Historical Society
3. Historic Old Pickens Foundation
4. Greater Pickens Chamber of Commerce
5. Pickens Innovation Center
6. Senior Citizens of Pickens, Inc.
7. Visit Clemson
8. Pendleton District Commission
9. Pickens Rotary club
10. Duke Energy Foundation
11. Preserving Our Southern Appalachian Music
12. Blue Ridge Electric Cooperative

State Representatives

1. State Representative David Hiott
2. State Senator Larry A. Martin

December 2, 2015

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
PO Box 217
Pickens, SC 29671

To whom it may concern:

Pickens Revitalization Association (PRA) fully supports the cleanup of the contaminated area that will be the future trailhead of the Doodle Trail, a 7.5 mile Rails-to-Trails multi-use trail developed in partnership with the City of Easley.

A non-profit organization, Pickens Revitalization Association was formed as a unique preservation-based economic development tool that enables the community to focus on business and community development. PRA is dedicated to the enhancement, preservation and sustainable growth of Pickens' historic downtown area. PRA firmly believes that Pickens is uniquely positioned to strengthen its existing assets, while also diversifying its economic base and community offerings.

PRA is committed to partnering with the City of Pickens to make the trailhead property a safe, clean and healthy connector between the Doodle Trail and downtown Pickens. We plan to be involved in the final design of the trail head to help ensure it helps the economic revitalization of the historic downtown and community, in addition to assisting with fundraising ideas for the project. PRA will provide periodic updates in our monthly newsletter, Around Town, to keep the community updated and informed on the environmental cleanup and redevelopment of the trailhead.

We appreciate the opportunity to beautify our community and make it a better place for residents and visitors alike.

Sincerely,

Allison Fowler
Executive Director

PICKENS REVITALIZATION ASSOCIATION
A South Carolina Main Street Community
222 West Main Street • Suite A • Pickens, SC 29671 • 864.878.0105
pra.historicpickens@gmail.com
www.historicpickens.com

Mr. Bruce Evilsizor 30 November 2015

Brownfield Coordinator

City of Pickens, SC

Dear Mr. Evilsizor:

The conversion of the Pickens Railroad right-of-way between Pickens and Easley to a popular walking and cycling path known as the Doodle Trail is already an obvious asset to both cities. We are pleasantly surprised by the number of people of all ages enjoying the trail so far. When the trailheads are completed, we are sure the numbers will increase and both cities will benefit in many predictable ways and many yet unforeseen. The PCHS is working now on educational and historic signage for the entire trail and the surrounding area.

Because of our limited tax base and resources, the Pickens County Historical Society is eager to partner with other community organizations to help raise funds to accomplish this important project. We are hopeful that grants will be available to remove asbestos and lead-based paint from the trailhead area and for general cleanup to revitalize this significant part of uptown Pickens. We are appreciative of all the hard work that so many have put into the trail to date.

We predict this project will prove overwhelmingly successful in creating a vibrant, healthy community for decades to come. Thank you for your leadership.

Best regards,

Ken Nabors

President

The Pickens County Historical Society.

Jackson A. Parris
Martha Parris
1158 E Preston McDaniel Road
Pickens SC 29671

December 1, 2015

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
PO Box 217
Pickens, SC 29671

Dear Mr. Evilsizor,

We are concerned citizens of Pickens County who have lived here for over 40 years. We are so proud of the improvements being made to the City of Pickens in the uptown area and the addition of the Doodle Trail. In spite of the limited funds available to the city, we have made so much progress in revitalization and we are looking forward to further improvements. One of the next and most important projects is the hub at the end of the Doodle Trail which connects Pickens with a bike trail going to Easley. Currently this area is blighted by dilapidated unused structures. This area is in great need of cleanup and refurbishing in order to provide a safe, clean, healthy, and attractive area which will connect to downtown Pickens which is only blocks away. The bike trail is an opportunity to encourage healthy life style practices for Pickens residents. The removal of some of the buildings containing asbestos and lead paint is essential to this commitment.

The end result will provide a venue for telling the story of the railroad and its historical importance to Pickens, and as local persons highly interested in the history of our region, we would be supporters as volunteers to help with this effort.

We hope you will be able to help us develop this asset to our community.

Sincerely,

Jackson A. Parris
Martha Parris
Historic Old Pickens Foundation

GREATER PICKENS
CHAMBER OF COMMERCE
where the mountains begin

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
P.O. Box 217
Pickens, SC 29671

Dear Mr. Evilsizor

The Greater Pickens Chamber of Commerce would like to offer its support to the City of Pickens EPA grant application The area of the grant application is located at the trail head of the newly constructed Rail to Trail (Doodle Trail) that connects Pickens and Easley. The grant would allow for the removal of lead and asbestos from the site and would repurpose the site for economic development.

Over the past 4 years the city has partner with several organizations both public and private to improve the down town area. From the façade improvement grant program to the Innovation Center the city is working to improve the community.

The business community see this area as a key part of the down town revitalization.

Mike Parrott
Director
Greater Pickens Chamber of Commerce
P.O. Box 153
Pickens, SC 29671
864-878-3258
info@pickenschamber.net

Protecting our People.

December 3, 2015

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
219 Pendleton Street
Pickens, SC 29671

Dear Bruce:

I host entrepreneurs who are coming into our town to take part of our favorable business environment and the gateway that we provide to the Blue Ridge Mountains. We are looking at ways to make our town consistently more hospitable, safe and beneficial to young entrepreneurs.

Asbestos is a combination of a group minerals made up of thin microscopic fibers. These fibers are resistant to heat, fire and chemicals, which was a major part of their appeal. Generally the presence of asbestos is not harmful until the possibility of it becoming damaged arises. When asbestos is disturbed, be it within lead paint or other industrial construction products or other innovations, the tiny fibers are released into the surrounding area.

Some of the buildings and residential areas around downtown Pickens and the Doodle Trail began using asbestos in construction materials, heavily in 1970, Pickens population had boomed because of the increase in textile factories in the industrial age, therefore causing for more residential areas to be built that we are now revitalizing as new homes and places of business.

Protecting our People.

If anything is disturbed in these buildings, such as paint, titles, lead piping, the area automatically becomes hazardous to those in and around. If these fibers are inhaled they can become trapped in the lungs. These trapped fibers can cause several serious health problems.

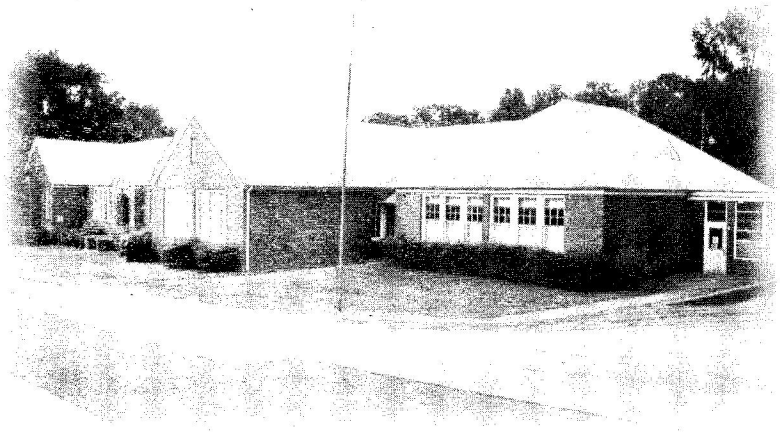
Inhaling these fibers can cause many issues with the membrane surrounding lungs, as well as abnormal buildup of fluid between the lungs and inside wall of the chest. Asbestos exposure has also causes, Asbestosis, an inflammation of the lungs, which results in shortness of breath and scarring of the lungs, making it difficult to breathe. It can cause an array of cancers including lung and Mesothelioma, which affects areas included lining of lungs, chest cavity and abdomen. Many of these symptoms do not show up for 20 or 30 years after exposure.

We are creating an urbanization plan for our municipality that revitalizes our town and spearhead innovation. We need this asbestos removed so that people will live and work here and if this takes place, I will send out the positive message to the 97 entrepreneurs who have visited our center in the last 120 days. Thank you for your consideration and support.

Regards,
Mark Reid Davis
Director, Pickens Innovation Center

107 Court Street, Pickens, SC
Pickens Innovation Center
864.202.1915

Senior Citizens of Pickens, Inc.



December 8, 2015

Bruce Evilsizor
Brownfield Coordinator
City of Pickens
PO Box 217
Pickens, SC 29671

Dear Bruce,

Senior Citizens of Pickens (SCOP) is the organization that manages the Hagood Community Center which is home to the Pickens Senior Center with over 300 members, Young Appalachian Musicians, the Granger Fiber Arts Center, Cannon Hospital Fitness Programs, Weight Watchers and other community groups. The Center is located approximately one block from the Doodle Trail and only a few blocks from the Doodle Trail Head. Over the last five years, the Center has raised over $700,000 and renovated the old Pickens Mill School into a Community Center providing an anchor redevelopment project along with the Doodle Trail in this old mill residential housing area. If the Trail Head is redeveloped many of the participants at the Center will utilize it.

Currently, the Trail Head Building is not only dilapidated and in disrepair, it is also, we understand, dangerous with asbestos, lead based paint, and oil residue. It is an ideal location for gathering for trail activities and a gateway into the City of Pickens. We would be more than happy to educate the many participants in the Center on the importance and progress of the cleanup project. The Center also hosts events like the "Gathering on Appalachian Life" which focuses on the history of Pickens and the part the railroad and the mill played in that. The productive re-use of those facilities will make it a successful story.

The City of Pickens demographically is older, less well educated, and lower income than most of the surrounding areas, especially Greenville. It also does not have a significant retail base or any manufacturing base, so raising funds for this type of project is extremely difficult. Conversely, it is exactly the kind of project that the City needs to revitalize. Your assistance will be greatly appreciated.

Sincerely,

John T. Howard
Treasurer

129 School House Street
P. O. Box 1574 • Pickens, South Carolina 29671

To whom it may concern,

I would like to address the need to receive the EPA Grant. Although we are not an organization located in the City of Pickens we are part of Pickens County and many of the residents of Clemson, SC and students of Clemson University use the Doodle Trail. Also as we try to encourage tourism throughout the entire county we do benefit from the success of the Doodle Trail.

It is important to remove any potentially harmful materials from the area, as most tourists who come to Pickens County who wish to use the Doodle Trail do so as part of maintaining a healthy lifestyle. Being able to promote the fact that asbestos and lead paint have been removed from a nearby facility makes it better suited for healthy living.

The Pickens community is a small town that is working to improve their financial outlook. With that being said there is not a whole lot of money available to take on a project of this magnitude. The community supports the trail and is used frequently but that does not change the fact that funds are limited in a community such as Pickens. Receiving an EPA Grant would make removing the harmful materials possible and would help to ensure the safe usage of the area for years to come.

The City of Pickens is working diligently to improve the area and the downtown district. Being able to remove this building and the harmful contaminants would be extremely beneficial as it would help to create a connector from the trail to the downtown area. Businesses would have increased sales from users of the trail as well as it would help cut down on pollution and traffic in the area if users were able to connect easily between the two.

The building is old and unrepairable. It has been an eyesore on Pickens for years. The removal of the building would allow for a park like setting or other things to be created in its space. It would make the trail and the area more visible as well which should encourage more usage of the trail. To my knowledge the building has set empty for years, I moved to SC in 1998 and cannot say I remember that building ever being used. It would be very beneficial to remove the building to help the continued revitalization of the Pickens community and Pickens County.

Being a representative of Visit Clemson the tourism headquarters for Clemson, SC we fully support the revitalization of the area. Pickens has many wonderful things to offer tourists to the area and removing an eyesore will help with overall tourism to Pickens County. We would be able to help distribute any materials about the project and also able to promote via our social media sites. In promoting tourism to our area we regularly tell people about the Doodle Trail and the benefits of a strong healthy community like Pickens. Removing the building and the hazards are part of this as well and need to be taken care of. We would be willing to help on any fundraisers or events that would help to raise financial support for the removal of the building and contaminants.

I currently serve as the Tourism Director in Clemson, SC and we actively promote Pickens County in its entirety. Any chance we can get to remove eyesores from the area and make the area a more friendly inviting space is fully supported by Visit Clemson a division of the Clemson Area Chamber of Commerce. The removal is good for the City of Pickens but also for the County as a whole. Tourism is promoted county wide and the Doodle Trail is another benefit to visiting our area. Visitors who come to the area want many things while they are visiting. They want nice restaurants and bars, shopping, safety, and most importantly most travelers now are looking for an active lifestyle. What they don’t want when they

visit is an eyesore in the area. The removal of the building will help to increase travel which in turn will increase business in the area. The need for this is significant in Pickens County and should be of high priority to make this area as safe and healthy as possible. Removing a vacant building will make the area safer as you would remove a possible area that would allow for crime and other things. The less obstructive the area is the better it is for the safety of our families, the community, and travelers to the area.

Kade Herrick
Tourism Director for Visit Clemson
1105 Tiger Blvd
Clemson, SC 29631

PENDLETON DISTRICT COMMISSION
HISTORICAL, RECREATIONAL, & TOURISM
ANDERSON, OCONEE, & PICKENS COUNTIES
SOUTH CAROLINA

December 5, 2015

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
PO Box 217
Pickens, SC 29671

Dear Mr. Evilsizor:

The City of Pickens is to be commended for the partnerships formed to build the Doodle Trail, which is a great addition to the healthy lifestyle options available for in our region. Removing asbestos and lead-based paint from a building near downtown Pickens, the Doodle Trail Head and some residential neighborhoods is crucial to the overall success of this project.

The City's will to revitalize the area surrounding the trailhead is strong, but we recognize that a scarcity of sufficient funding for cleanup of this vital property will stall progress. The requested EPA Grant funds will allow the City of Pickens to mitigate blight and remove hazardous materials while creating a healthy, safe, clean and inviting connector between the Doodle Trail and the heart of downtown Pickens. We sincerely believe this project will become the anchor for the revitalization of this key section of the city, located near its southern entryway.

Upon completion of the Doodle Trail Head Project, Pendleton District Commission, the region's destination marketing organization, will assist by promoting the Doodle Trail as one of the attractions to bring visitors into the region, thereby increasing the economic impact of the Doodle Trail for the City of Pickens.

We would appreciate EPA's favorable consideration of the City of Pickens' request for funds for the Doodle Trail Head Project and urge full funding of this important work.

Sincerely,

Vicki B. Fletcher

Vicki B. Fletcher
Executive Director

Pendleton District Commission – PO Box 565 – Pendleton SC 29670 – 864-646-3782

December 5, 2015

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
PO Box 217
Pickens, SC 29671

Dear Mr. Evilsizor,

Thank you for asking The Pickens Rotary Club to become a community partner for the Brownfield Cleanup Project. The Pickens Rotary Club has been a supporter of the Doodle Trail since the discussions first started for the trail. We have seen Pickens go from being a town with many textile mills and several large manufacturing plants to a town with no major employers. With the loss of so many jobs, the city realizes we must work in all ways possible to help the city proper. The Doodle Trail is a great start to make Pickens a destination for people interested in an active lifestyle. Now that the trail itself is open and ready to use, we need to build a trailhead that will encourage riders to spend time and money in Pickens. However, the dilapidated railroad buildings at the trailhead must be removed before we can begin to revitalize the area.

The buildings remaining from the railroad maintenance business that previously occupied the location have been found to have asbestos and lead based paint. Since we want to promote the Doodle Trail as a healthy access point to Pickens, this issue must be addressed. We hope to use the Doodle Trail to help revitalize the economy in Pickens, but can't develop the trailhead until the old buildings can be removed. However, the cost for removal of these environmental issues is an expensive project for a small town like Pickens. This grant would allow the city to remove the old buildings and start the trailhead.

In 2015, one of The Pickens Rotary Club's major projects was to raise money to build a rest stop on the Doodle Trail. I am sure the Pickens Rotary Club and its members will continue to be strong supporters in the development of the Doodle Trail. Our club has about 50 members and we will be willing to actively help distribute information concerning the Trail Head cleanup and redevelopment.

As an active rail-trail user myself, I have traveled to several other cities and states to ride their rail-trails. Rail-trails have been proven over and over to be an economic boost to the cities connected to the trails. If we can remove the asbestos and lead paint so we can demolish the old buildings and replace them with an inviting trailhead, we hope that trend will continue and new businesses will follow the trail to Pickens.

Sincerely,

Linda S Cassell
Doodle Project Chairperson
Pickens Rotary Club

Nath Briley
President
Pickens Rotary Club

DUKE ENERGY.
CAROLINAS

1636 Pearman Dairy Rd
Anderson, SC 29625

o: 864.260.5378
c: 864.934.8988

November 13, 2015

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
PO Box 217
Pickens, SC 29671

To Whom It May Concern,

Duke Energy is excited about the opportunity to partner with the City of Pickens to leverage the resources of local partners and the EPA Brownfield Cleanup Grant program in order to remove the hazardous conditions at the area known as the Doodle Trailhead. This rails-to-trails project has brought excitement and pride back to the citizens, and the connection between the trailhead and the downtown area of Pickens is causing a flurry of activity and a resurgence of business vitality in a previously deserted and vacant section of Pickens. The safety, health, and well-being of our communities depends on efforts like this to make improvements, however, funding to mitigate environmental issues such as lead paint and asbestos is costly. The City of Pickens has demonstrated the ability to manage funds prudently in order to maximize the impact on the community, and will continue to do so while enhancing the quality of life for all who live, work, and play near or on the Doodle Trail.

As we join together to support the efforts of the City of Pickens, we encourage you to strongly consider supporting them as well.

Sincerely,

Emily DeRoberts

Emily DeRoberts
SC Government and Community Relations Manager
Duke Energy Carolinas

POSAM Preserving Our Southern Appalachian Music • Supporting Young Appalachian Musicians (YAM)

December 1, 2015

Bruce Evilsizor, Brownfield Coordinator
City of Pickens
219 Pendleton Street
Pickens, SC 29671

Dear Bruce,

As an involved citizen of Pickens County, I would highly recommend the City of Pickens to receive the EPA Brownfield Clean-up Grant. There are several reasons I believe Pickens should be the recipient of this funding:

- Per capita income is quite low in the City so in order to fund this clean up, the City will need help.
- As an educator and on the Board of Directors of Senior Citizens of Pickens, the goal of helping our community encourage an active, healthy lifestyle for all ages is very important to me.
- The community is trying hard to revitalize the area. I'm currently facilitator for the Grow Pickens County Forum and each of our members (50+) sees this cleanup as moving in a very positive direction for our town.

We, at Hagood Community Center, would welcome the chance to be a community partner with the City of Pickens to support and help with clean-up of the area at the head of the Doodle Trail. Hagood Community Center (aka the Pickens Senior Center) is owned by the City of Pickens. For several years now we, at the Center, have been undergoing renovation and are currently in the last phase. If it hadn't been for grants from National Endowment for the Arts (Our Town), Appalachian Regional Commission, and other grantors choosing to fund renovation projects at the Center for over $600,000, the renovation would not have been possible. The City also has helped fund over the years a substantial part of these renovations. Similarly, we hope, with the help of grants, to continue to revitalize our community/our town.

I work with young people in two different ways—director of the non-profit, Young Appalachian Musicians (YAM-300, 3rd-8th graders), and as a media specialist at an elementary school in Pickens. The YAMs and students/parents could actively help with clean-up projects as well as fundraising projects where the YAMs could help entertain. Many of these seniors would be supportive by helping with cleaning up and fundraising opportunities. Grow Pickens County Forum (GPCF) would help distribute the publicity materials and other information to educate the community. I believe this project would be one the entire town will get behind.

792 Holly Springs School Road, Pickens, South Carolina 29671 (864)878-4257 or (864)878-9690

Please consider the City of Pickens as the recipient of this EPA Brownfield Clean-up Grant. It will be greatly appreciated and used by our community, town, and surrounding area.

Sincerely,
Betty McDaniel, PhD
(mcdanibw@bellsouth.net; 864-878-4257)

BLUE RIDGE
Electric Co-op

TO WHOM IT MAY CONCERN

I am writing today on behalf of the City of Pickens and its leadership in their effort to secure an EPA Brownfield Grant. The city is in the midst of an undertaking to upgrade the trail head of the "Doodle Trail". This several-miles-long trail serves as an avenue for residents of Pickens to run, walk, bike, and otherwise enjoy the great outdoors. Moving forward, the trail also offers the potential to serve as an economic engine for the town.

To maximize that potential, the trail head needs to go through an extensive upgrade. Part of this enhancement would include cleanup of asbestos and lead-based paint from the old railroad building situated near downtown Pickens.

Small and tightknit, Pickens is a community where the citizens rely heavily on one another. As is the case with many small municipalities, funding for projects such as this can be difficult to come by. The Brownfield Grant would enable the town to begin a great revitalization project that could provide for a safe, clean, and healthy place that would contribute to the enjoyment of Pickens residents.

Blue Ridge Electric Cooperative has been a community partner with Pickens for seventy-five years. We hope maintain that partnership for at least another seventy-five and look forward to supporting this cleanup effort in any way possible. I would, therefore, request that the City of Pickens Brownfield Grant Application be given all due consideration.

Thank you for your attention to this information. If I can be of any further assistance, please let me know.

Sincerely,

Charles E. Dalton

Charles E. Dalton *President CEO*
Blue Ridge Electric Cooperative, Inc. • ***Blue Ridge Security Solutions***
PO Box 277, Pickens, SC 29671 • 864/898-2016 • *email* charles.dalton@blueridge.coop

CELEBRATING 75 YEARS BLUE RIDGE Electric Co-op 1940-2015

David R. "Davey" Hiott
District No. 4 - Pickens County
P.O. Box 997
Pickens, SC 29671

Committee:
Agriculture, Natural Resources and
Environmental Affairs, Chairman

House of Representatives

State of South Carolina

411 Blatt Building
Columbia, SC 29201

Tel. (803) 734-3022

December 2, 2015

Mr. Bruce Evilsizor
Brownfield Coordinator
City of Pickens
Post Office Box 217
Pickens, SC 29671

Dear Mr. Evilsizor:

It is my pleasure to support the grant application by the City of Pickens as they work to cleanup, beautify and enhance the community they cherish, live in and to present a positive image to those who travel through Pickens.

By awarding this grant, it will enable them to remove asbestos and lead-based paint from a building near the downtown, Doodle Trail and some residential neighborhoods. The Pickens community, not having a lot of money and financial help, is in need of assistance to cleanup this property. The community is trying hard to revitalize this area and make this property a safe, clean and healthy connector between the bike trail and downtown. The cleanup will have the result of removing blight from a key part of the city to let everyone know this community takes pride in their surroundings to ensure the best possible impression.

Please give their grant application your careful review and award this grant to help these dedicated residents of Pickens work hard to uplift and enhance the quality of life for the entire community.

Sincerely,

Davey Hiott

David Hiott

DH/ss/dec2-15-1

LARRY A. MARTIN
SENATOR, PICKENS COUNTY
SENATORIAL DISTRICT NO. 2

HOME ADDRESS:
P. O. BOX 247
PICKENS, SC 29671
OFFICE: (864) 859-6323
HOME: (864) 878-6105
DEL. OFFICE: (864) 850-7070

SENATE ADDRESS:
P. O. BOX 142
GRESSETTE SENATE OFFICE BUILDING
COLUMBIA, SC 29202
(803) 212-6610
EMAIL: LARRYMARTIN@SCSENATE.GOV

THE SENATE OF SOUTH CAROLINA

COMMITTEES:
JUDICIARY, CHAIRMAN
BANKING AND INSURANCE
EDUCATION
RULES

December 2, 2015

Mr. Bruce Evilsizor, Brownfield Coordinator
City of Pickens
P.O. Box 217
Pickens, SC 29671

Ref: Brownfield Cleanup Grant/City of Pickens

Dear Mr. Evilsizor:

It is my pleasure to offer my strong support for the Brownfield Cleanup Project at the Doodle Trail Head in Pickens. It is my understanding that the funding for this grant will be utilized in removing asbestos and lead-based paint from a building that is in the immediate area of the Doodle Trail that presently ends in the City of Pickens. I appreciate the fact that the city and our community are working hard to revitalize this area and make the property a safe and healthy place between the bike trail and downtown. This important work will have the effect of removing a significant blight in this part of our community.

Again, it is a pleasure for me offer my support for this important grant request. You certainly have my very best wishes for much success.

With kindest regards, I remain

Sincerely,

Larry A. Martin

Larry A. Martin

Attachment D.

Documentation of Leveraged Funding

1. City of Pickens Resolution for Local Match
2. Town Creek Park – ARC Grant Project Summary
3. Town Creek Park – Project Press Release
4. Town Creek Park – Compliance Documentation and Audit for RTP and ARC Grants

State of South Carolina }
County of Pickens }
City of Pickens }

Resolution 2015-07

RESOLUTION

A RESOLUTION SUPPORTING THE LOCAL MATCH FOR THE EPA BROWNFIELD CLEANUP GRANT APPLICATION

WHEREAS, the City of Pickens owns the 1.89 acre site at 124 Railroad Street, Pickens, SC which is the former Pickens Railway Company facility (site is also known at 409 East Cedar Rock Street); and

WHEREAS, the property has been a railroad facility since the late 1800's and, most recently, the Pickens Railway Company utilized the facility for railroad and locomotive repair and refurbishing until 2012; and

WHEREAS, the November 2015 Asbestos and Lead-Containing Paint Survey conducted by Terracon Consultants Inc. identified asbestos and lead-containing paints throughout the structures; and

WHEREAS, an opportunity exists for the City of Pickens to aid the community by applying for an EPA Brownfield Cleanup Grant to remove the hazardous materials and prepare the site for redevelopment for the Doodle Trail; and

WHEREAS, the estimated project cleanup cost is $153,000 and the City of Pickens must commit to $26,000 as a local match to receive an EPA Brownfield Cleanup Grant for $127,000:

NOW THEREFORE BE IT RESOLVED THAT the City of Pickens commits a $26,000 local match from the General Fund to the EPA Brownfield Cleanup Grant Project to remove the hazardous materials from the railroad buildings owned by the City of Pickens at 124 Railroad Street, Pickens, SC.

SIGNED, SEALED AND ADOPTED BY City Council this 7th day of December, 2015.

Mayor

Council Member

Council Member

Council Member

Council Member

Council Member

Council Member

Council Member

ATTEST:

Brittany Chapman, Clerk to Council

ARC PROJECT SUMMARY

Project Title: Town Creek Park (towncreekpark.com)

Project Grantee: City of Pickens, SC

County(ies) Served: Pickens County - Transitional

Basic Agency: SC Department of Commerce

Goal/Strategy: ARC Goal 3 – Infrastructure: Develop and improve Appalachia's infrastructure to make the Region economically competitive.

State Objective 3.5: To make long term investments that will preserve and enhance natural resources, promote sustainability and improve the quality of life.

Purpose: The purpose of this project is to transform nearly 100 acres of City owned land into one of the premier off-road recreational bicycling facilities in Upstate South Carolina. Town Creek Park will be the first park developed within the PELCOR (Pickens Easley Liberty Corridor) initiative and one of the first parks in the state with unique bicycling features designed to enhance the riders experience though challenge, wellness, education, and environmental awareness.

Funding:

City used $100k RTP Grant for part of it's local share

	Amount	%	Source
ARC	$400,000	49 %	Area Development
Local	$400,000	49 %	(Hospitality Bond issued by City)
Local	10,000	2 %	City of Pickens
Total	**$810,000**	**100 %**	

Description:

The proposed project will implement Phase 2 and Phase 3 of the Town Creek Park Trail Master Plan and includes several project elements:

The Appalachian Lumber Greenway (ALG) will connect the Pickens Recreation Center to the Playground of Promise as a first phase of a longer community greenway. The total length of the first phase ALG is estimated at 4,000 LF and will be a 10'-12' foot wide multi-use greenway trail. Funding will assist with the construction for a bridge across a tributary of Town Creek along the ALG including the feasibility study of utilizing a local, historic steel bridge once in use on the property. Additional bridges are necessary over Town Creek allowing access to the full 100 acres and will require additional funding.

New Ride Gardens include a 4,000' wooden/earthen pump coaster track for intermediate to advanced mountain bikers, two enhanced trailheads including the hardscaped Ledges Rock Garden, rideable Bio-Swales for storm water treatment and environmental education, Pump Track, and Balance Beams. Nearly two miles of new singletrack, kiosks and signage, site furnishings, bike racks and wash stations, and a picnic shelter are also included in these first two phases.

Rationale: (1 short paragraph max)

- Problems and/or issues that project will alleviate.
- Local, regional and/or state need for project.
- Critical circumstances that compel project to be funded by ARC.

PELCOR is an initiative passed by Council resolution in Pickens, Easley and Liberty in 2011. This agreement represents a good faith agreement for all three towns to work together to increase recreational activities at a bicycling facility within their own cities with long term goals of connecting the three facilities with additional bicycling infrastructure. The Town Creek Park Trail Master plan was created by a committee of residents and City Council in 2011 to establish the first PELCOR destination. The idea behind a mountain bike park came from citizens and has been identified as successful revenue generator both locally and in other regions of the country. The overall goals of building this biking facility is to increase the enjoyment of active recreation options in the City of Pickens, thereby improving health and community, and to also provide substantial opportunities for the City to benefit from increased marketing exposure and economic development brought forth from the use and support of these facilities by residents and outside tourists.

Benefits: (1 short paragraph max)

- Results and accomplishments to be derived from project.
- Other non-quantifiable benefits (e.g. partnerships, improved standard of living, etc.)

Nearby communities in Greenville County have demonstrated that bicycling facilities can draw tourists from a large regional area. We believe this project contributes to a regional goal of making Pickens a destination, increasing recreational tourism spending, and increasing the quality of life for current residents. This project also addresses goals of the Pickens County Vision 2025 Strategic Plan and larger statewide goals of the 2008 South Carolina Outdoor Recreation Plan.

Performance Measurement:

Outputs: Construction of Phase 2 and Phase 3 of the Town Creek Park Master Plan to include off road bicycling facilities and other amenities.

Goal Demonstration:

ARC Goal 3 - Numerous planning organizations have recommended the establishment of a multi-modal transportation network for our region to help address one aspect of transportation issues affecting many nearby communities. Improving Appalachia's infrastructure with the addition of facilities focused on trail-based tourism provides economically competitive options to stretch available funding while enhancing basic infrastructure and promoting local environmental assets such as Town Creek Park.

State Objective 3.5 - To make long term investments that will preserve and enhance natural resources, promote sustainability and improve the quality of life.

Outcomes: Improved health of the residents, and increase in economic development and quality of life in the City of Pickens.

DAVID OWENS
Mayor

Council
DONNIE MCKINNEY
CARLTON HOLLEY
PATRICK LARK
FLETCHER PERRY
ISAIAH SCIPIO
PATTI WELBORN

BRUCE EVILSIZOR
City Administrator

historic Pickens
Where the Mountains Begin.

PO BOX 217
PICKENS, SOUTH CAROLINA 29671
P | 864.878.6421
F | 864.878.0450
www.cityofpickens.com

RODNEY GREGORY
Police Chief

CHRIS ELROD
Fire Chief

CORY COX
Public Works Director

BRIAN GRAVELY
Water/Wastewater
Superintendent

CHERI ANTHONY
Recreation Director

November 10, 2014
FOR IMMEDIATE RELEASE

Contact: Bruce Evilsizor
864.878.6421

FIRST LOOK AT TOWN CREEK BIKE PARK

Pickens, SC. The City of Pickens invites you to a First Look at Town Creek Bike Park this weekend. On Saturday, November 15th the City is hosting a Volunteer Day from 10am – 3pm at the Park to prepare for the opening. On Sunday, November 16th at 2pm, the City is hosting a Ribbon Cutting celebration. Please join the City either or both days this weekend at 545 Sangamo Road to participate in the fun. A Grand Opening Celebration for the Park will be held in early Spring 2015.

Town Creek Bike Park hosts a number of exciting features, including:

- 8' wide paved trail called the "Appalachian Lumber Greenway" that follows most of the existing trail along the historic Appalachian Lumber Company railroad route and provides a multi-use and ADA compliant path between the Pickens Recreation Center and the Playground of Promise
- 4,000' FlowCoaster
- Berm turn wall rides
- Dirt Jumps
- Earthen Rollers
- Wooden Rollers
- Apex Over-Under Bridges
- Raised Half Log Trails
- Wooden Banked Turns
- Pump Track and Earthen Bowl
- Single Track

The total construction budget for the project was $765,000. The City received a $400,000 grant from the Appalachian Regional Commission and $100,000 grant from the SC Recreational Trails Program. The City put in cash match from the hospitality tax account, which is restricted by state law to only be used on tourism related activities. The vision of this park is to be a state of the art riding facility which draws riders of all levels from across the Southeast. Construction was completed on the Appalachian Lumber Greenway in July and the rest of the construction was completed in early November.

For more information on Town Creek Bike Park or the First Look celebration, please visit: www.cityofpickens.net/departments/recreation/recreational-locations/town-creek-bike-park.

Inclusions:
Town Creek Bike Park Logo
Town Creek Bike Park First Look Poster

COMPLIANCE SECTION

CITY OF PICKENS, SOUTH CAROLINA

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

YEAR ENDED APRIL 30, 2015

Federal Grantor/ Pass-through Grantor/Program or Cluster Title:	Federal CFDA Number	Grant/Contract Number	Federal Expenditures
US DEPARTMENT OF HOUSING / URBAN DEVELOPMENT			
Pass-through from the State Department of Commerce:			
CDBG	14.228	4-V-11-013	$ 89,869
TOTAL US DEPARTMENT OF HOUSING / URBAN DEVELOPMENT			89,869
US DEPARTMENT OF TRANSPORTATION			
Pass-through from the State Department of Parks, Recreation & Tourism:			
RTP Grant - Town Creek Park Phase II Trails	20.219	2012006	100,000
TOTAL US DEPARTMENT OF TRANSPORTATION			100,000
US DEPARTMENT OF JUSTICE			
Pass-through from the State Department of Public Safety:			
JAG Grant 2014 - Grant	16.738	1G13044	27,508
TOTAL US DEPARTMENT OF JUSTICE			27,508
APPALACHIAN REGIONAL COMMISSION			
Pass-through from the State Department of Commerce:			
Appalachian Regional Commission - Town Creek Park	23.002	4-G-12-002	400,000
TOTAL APPALACHIAN REGIONAL COMMISSION			400,000
GRAND TOTALS			**$ 617,377**

See accompanying notes to the schedule of expenditures of federal awards.

CITY OF PICKENS, SOUTH CAROLINA

NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

YEAR ENDED APRIL 30, 2015

A. GENERAL

The accompanying Schedule of Expenditures of Federal Awards (the "Schedule") presents the activity of all federal award programs of the City of Pickens, South Carolina (the "City") for the year ended April 30, 2015. Expenditures for federal financial assistance awarded directly from the federal agencies, as well as those passed through other government agencies, are included on the Schedule.

B. BASIS OF ACCOUNTING

The accompanying Schedule is presented using the modified accrual basis of accounting, which is described in the notes to the City's financial statements.

C. RELATIONSHIP TO THE FINANCIAL STATEMENTS

Federal award expenditures are reported in the City's financial statements as expenditures in the Grants Fund.

D. MATCHING COSTS

Matching costs, i.e., the non-federal share of certain program costs, are not included in the accompanying Schedule.

REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM AND REPORT ON INTERNAL CONTROL OVER COMPLIANCE AS REQUIRED BY OMB CIRCULAR A-133

INDEPENDENT AUDITOR'S REPORT

The Honorable Mayor and Members of City Council
City of Pickens
Pickens, South Carolina

Report on Compliance for Each Major Federal Program

We have audited the City of Pickens, South Carolina's (the "City") compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of the City's major federal programs for the year ended April 30, 2015. The City's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the City's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the City's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the City's compliance.

Opinion on Each Major Federal Program

In our opinion, the City complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended April 30, 2015.

Report on Internal Control Over Compliance

Management of the City is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the City's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the City's internal control over compliance.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.

Greene, Finney & Horton LLP

Greene, Finney & Horton, LLP
Mauldin, South Carolina
August 18, 2015

Attachment E.

Documentation of Community Notification

1. Public Notice – Pickens County Courier
2. Public Notice – Displayed in Pickens City Hall
3. Public Notice – Official Website of City of Pickens, SC (www.cityofpickens.com)
4. Pickens County Courier Article discussing Pickens' intent to seek Brownfields Funding
5. December 14, 2015 Community Meeting Sign-In Sheets
6. December 14, 2015 Community Meeting Minutes
7. December 14, 2015 Community Meeting Comment Sheet
8. December 14, 2015 Community Meeting Responses to Comments

Pickens County
Courier

Pickens County's only locally owned and operated newspaper

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PROOF OF PUBLICATION

I, Rocky Nimmons, Publisher of
The Pickens County Courier
A newspaper in the
Area of Pickens, South Carolina,
Located in the Pickens County
Area, and entered in a newspaper of
Record, according to the Laws and Regulations
Of the United States of America for 1
Consecutive weeks.

I hereby certify that the notice
Public Meeting Notice

Attached hereto has been published on
11-25

Rocky Nimmons, Publisher

Sworn to and subscribed before me this
25 day of November 2015

Anne Stratton

My Commission expires 6/15/2020

Public Meeting Notice
Intent to Apply for an EPA Brownfield Cleanup Grant

The City of Pickens intends to apply for an EPA Brownfield Cleanup Grant for the City's property at 124 Railroad Street in Pickens, SC (former rail yard of the Pickens Railway Co). A public meeting will be held **Monday, December 14, 2015 at 3pm** in the City Hall Council Chambers 219 Pendleton St. Pickens, SC

A draft copy of the City's grant proposal which includes a draft copy of an Analysis of Brownfield Cleanup Alternatives (ABCA) document will be available on the City's website at **www.cityof-pickens.com** or at the Pickens City Hall on Thursday, December 3, 2015 through December 18, 2015. Interested persons are encouraged to review and comment on the draft grant proposal and ABCA by either attending the Public Meeting on December 14, 2015 or by emailing the City's Brownfield Coordinator Bruce Evilsizor at **bevilsizor@pickenscity.com**.

City of Pickens
Where the Mountains Begin.
219 PENDLETON STREET
P. O. BOX 217
PICKENS, SC 29671
www.cityofpickens.com

Public Meeting Notice
Intent to Apply for an EPA Brownfield Cleanup Grant

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11-30-15 POSTED in City Hall Lobby

Official Website of the City of Pickens, SC

Where the Mountains Begin

Draft Proposal for EPA Brownfield Grant--Doodle Trail Head

Thursday, December 03, 2015

Intent to Apply for an EPA Brownfield Cleanup Grant

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Draft Proposal for EPA Brownfield Grant
Analysis of Brownfield Cleanup Alternatives

FOOTBALL FRENZY

INSIDE:
TIGERS STILL UNBEATEN
SEASON WRAP-UP STORIES FOR PICKENS, DANIEL

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Pickens seeking EPA cleanup grant

PICKENS — The City of Pickens is asking for community leaders' help in applying for an EPA Brownfield Cleanup Grant to improve the Doodle Trail trailhead property at the corner of S.C. Highway 8 and Railroad Street.

The EPA recently permitted cleanup applications for the removal of asbestos and lead-based paint, which made Pickens eligible to apply for a grant to remove some or all of the old railroad buildings at the trailhead.

An email sent to leaders of area businesses and organizations by city administrator Bruce Evilsizor this week asked for help from "community partners" for the project.

As part of the brownfield application process, the city of Pickens must submit letters of support from community partners before Dec. 4.

A letter of support should try and address some or all of the following points, Evilsizor wrote in his email.

• The importance of removing asbestos and lead-based paint from a building that is near the downtown, Doodle Trail and some residential neighborhoods.

• Mention of the Pickens community not having a lot of money and financial help needed to cleanup this property.

• The community trying hard to revitalize the area and make the property a safe, clean and healthy connector between the bike trail and downtown.

• The cleanup removing blight in a key part of the city.

"When scoring the grant applications, the EPA places a high priority on the level of community partners for the project, and this is often the deciding factor on whether the application is funded or not," Evilsizor wrote.

See GRANT on page 3A

Report card shows graduation rate continues to climb

COUNTY — The South Carolina Department of Education has released its annual report cards on schools and districts, showing the School District of Pickens County's on-time graduation rate hitting a new high of 82 percent in 2015. This is the seventh straight year of improvement for the district's graduation rate.

"The graduation rate is a tremendous story of ongoing

superintendent Dr. Danny Merck said. "In 2010, the board of trustees set a goal of reaching an 80 percent graduation rate by 2015. We met that goal a year early, and last year we just kept building on that success."

Assistant superintendent of instructional services Sharon Huff pointed to several initiatives that contributed to the increase including graduation

Country Santa.

A limited number of exclu-

p.m., and the card is subject to change.

Parades

From page 1A

parade for 10 a.m. Dec. 5. The parade will be on Main Street, and the theme is "Christmas: Past, Present, and Future." The application fee is $25 for each entry, with a deadline of Nov. 27. There is no charge for school-related entries. Application forms are available at easleyevents.com/christmas. For more information, call Dunburks Premier Events at (864) 423-4344. Pre-parade activities are planned as well.

Six Mile is next in the lineup, as it has also scheduled its parade for Dec. 5, with a 10:30 a.m. start time. All entries must have a Christmas theme, and there is no entry fee. The parade route will be on Main Street. Parade organizer Dora Jane Duncan announced this week that Wallace Merck, a Six Mile native and actor who appeared in films such as "Fried Green Tomatoes, "Super Mario Bros." and "RoboCop 2," will be the grand marshal for the parade. For more information, contact Duncan at (864) 868-2349.

The annual Central parade is also planned for Dec. 5 and will start at 1:30 p.m. The parade will travel down S.C. Highway 93. There is free registration on the day of the event, beginning at 12:30 p.m. at Mt. Zion Cemetery. Call the Central Fire Department for more information at (864) 639-5608.

Liberty will hold an evening parade, also on Dec. 5, starting at 6 p.m. The parade will be downtown, with the theme "Light my Liberty." Registration is free, with forms available at libertysc.com. Contact Jamie Burns for more information by calling (864) 843-3177 ext. 6, or by email at jburns@libertysc.com. A tree-lighting ceremony is set to follow the parade.

Pickens will hold its Christmas parade on Dec. 11 at 7 p.m. downtown. Applications are available online at historicpickens.com or cityofpickens.com under the community event calendar, at the PRA/Chamber office and at City Hall. Entry is $10 for nonprofit organizations, $20 for individuals or business and commercial entries and free for bands or dignitaries. Deadline for entry is Tuesday, Dec. 8, at 5 p.m.

Norris will have its parade on Dec. 12, starting at 11 a.m. The parade route will be on S.C. 93. This year's theme is "Old-Fashioned Christmas." Registration is free. If you want your entry to be judged, the deadline to register is Dec. 9. Contact (864) 639-2033 for more information.

Dacusville will round out the Pickens County parade season on Dec. 12 as well. The event will start at 2 p.m., with a rain make-up date of Dec. 13 at 2 p.m. This year's theme is "Christmas in the Country." There is a $15 entry donation for registering in advance and a $20 entry donation on the day of the parade. For more information, contact Randy at (864) 270-1599, David at (864) 855-2920, Betty at (864) 201-5678 or Teresa at (864) 419-6621. The Dacusville tree-lighting ceremony is set for Dec. 11 at 7 p.m. at the Dacusville Community Center.

Grant

From page 1A

"The EPA's goal is to have community partners that have some active role in the local cleanup project. Since the cleanup effort is a part of the Doodle trailhead project, the partnership commitment can be related to both the cleanup and the end result of a trailhead that promotes active living, is environmentally safe, adds value to the community, etc."

The email gave some ideas on how leaders could help show they are a "community partner" in their letters of support.

• Agree to help educate the community by distributing information about the project from the application phase to the finished product (we'll keep you informed along the way).

• Offer in-kind support specific to your field of interest or expertise to the cleanup and end use of the project (e.g. healthy living, active living, environmental-friendly designing of the trailhead, historic education of rail yard).

• Financial support (sorry this was in the EPA document but you know we'll always take it). This does not have to be anything large but could be a fundraiser that raises money but also educates the community.

• If the blight and safety concerns of the old buildings are a problem in your eyes, your letter can talk about this issue and how you support the effort to redevelop this property into something healthy, safe and good for the community.

• The EPA realizes there will be community organizations that cannot be an active partner and in these cases, they do appreciate a letter of support.

Along with a community partner support letter, Evilsizor asked member of the community to attend a public meeting for the brownfield project on Dec. 14 at 3 p.m. at City Hall and show support, because he said as part of the application, the city will need to show how many people attended the public meeting, along with the comments given.

Along with the Brownfield grant, the city is also applying for two other grants to extend the trail to Highway 8 downtown, construct restrooms, make green space and dress up the entrance at Highway 8. Letters are not needed for these two grants, but Evilsizor said officials appreciate community support.

He said the conceptual design of the trailhead will be coming soon.

"This design will get us started and as the grant funding develops, the final design will be configured," Evilsizor wrote.

Award

From page 1A

most about his job, James replied "the thrill of the chase."

Seven detectives work with James, who said he is blessed to have such a great team that works hard at solving crimes.

"We really do have great camaraderie in the sheriff's office right now, especially in the detective division," James said. "I have full faith of putting anything in their hands."

James said he doesn't let the scrutiny law enforcement is under these days, locally as well as nationally, impact his work because to focus on it "makes it hard to do your job."

He came to Pickens County

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Saturday, D

City of Pickens, SC - US EPA Brownfields Hazardous Substance Cleanup Grant Application
Former Rail Depot Property - Doodle Trail Head Redevelopment
December 14, 2015

Sign-In

1 Vicki Fletcher
2 Cole McDaniel
3 Betty McDaniel
4 Emily DeRoberts
5 Dave Owen
6 Gous Porter
7 Patti Weller
8 Dale Harwood
9 Lucy Harwood
10 David E. Owen
11 Kate [illegible]
12 Mike Garrett
13 Jim [illegible]
14 [illegible]
15 [illegible]
16 Brittany Chapman
17 Chris J. [illegible]
18 [illegible]
19 Ellen Forchanson

City of Pickens, SC - US EPA Brownfields Hazardous Substance Cleanup Grant Application
Former Rail Depot Property - Doodle Trail Head Redevelopment
December 14, 2015

Sign-In

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City of Pickens
Minutes of EPA Brownfield
Clean-Up Grant Public Hearing
City Hall Council Chambers
December 14, 2015 -- 3:00 P.M.

Bruce Evilsizor opened the Public Meeting at 3:01 p.m.

Tice Welborn with Terracon Consultants spoke on the EPA Brownfield Clean-Up Grant and funding availability. Mr. Welborn also provided a detailed sideshow presentation. An approximate timeline for the clean-up was discussed. Grant winners are expected to be announced in May of 2016.

Mr. Welborn briefly went over how the EPA Brownfield Clean-Up Grant can benefit the community by removing hazards, increasing property value, healthy green-space, etc. Tice mentioned that EPA Brownfield takes pride in community engagement and suggested community meetings as well as a task force assembly.

If the Grant is awarded the project would likely begin around October to November of 2016.

During the property evaluation, asbestos and lead paint based systems were identified at the site. These two issues can be addressed by the EPA Brownfield Clean-Up Grant. The current planned Grant amount that the City is requesting is approximately $150,000. That amount is not firm at this time.

Mr. Welborn invited the attendees to complete and submit any comments they had on the forms at the table.

Mayor David Owens asked if more funds could be requested if needed. Mr. Welborn noted that if more issues are found it is possible to request more funding. There were a few questions about the timing and scope of the project. There were no negative comments or concerns placed. It was pointed out that some buildings will still be standing after the EPA Brownfield Clean-Up Grant monies have been utilized. Mayor Owens added that the City would like to see public restrooms on site and a Railroad Depot replica with a nice mountain view.

Bruce Evilsizor closed the Public Meeting at 3:48 p.m.

Approved as written:

Bruce Evilsizor, City Administrator

City of Pickens, SC - US EPA Brownfields Hazardous Substance Cleanup Grant Application
Former Rail Depot Property - Doodle Trail Head Redevelopment
December 14, 2015

Comments

1	Name: Dale Harrison Comment: Tremendous project for the improvement of Pickens
2	Name: Comment:
3	Name: Comment:
4	Name: Comment:
5	Name: Comment:
6	Name: Comment:

City of Pickens, SC – Brownfields Cleanup Grant Application
Former Rail Depot Property – Doodle Trail Head Development
Response to Comments from December 14, 2015 Community Meeting

Comment 1

"Tremendous project for the improvement of Pickens"

- Dale Howard

Response 1

We appreciate the community's continued support for this project and hope that the successful completion of this project benefits the community and serves as a catalyst for further improvements in Pickens.

Attachment F.

Draft Analysis of Brownfields Cleanup Alternatives (ABCA)

Draft Analysis of Brownfield Cleanup Alternatives

FORMERRAILDEPOT
124RAILROADSTREET
PICKENS,PICKENSCOUNTY,SC

December 2, 2015

Terracon Project No. 86157105

Prepared for:
City of Pickens
Pickens, South Carolina

Prepared by:
Terracon Consultants, Inc.
Taylors, South Carolina

terracon.com

Terracon

Environmental ■ Facilities ■ Geotechnical ■ Materials

Draft Analysis of Brownfield Cleanup Alternatives
In Support of EPA Brownfield Cleanup Funding Proposal
(Hazardous Substances)
Former Rail Depot

124 Railroad Street
Pickens, South Carolina

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1.0 INTRODUCTION AND BACKGROUND

This Draft Analysis of Brownfield Cleanup Alternatives (ABCA) is in support of a proposal application for United States Environmental Protection Agency (EPA) Brownfield Cleanup grant funding to address hazardous substances as asbestos-containing material (ACM) and lead based paint (LBP) at the Former Rail Depot (Site) located at 124 Railroad Street in Pickens, Pickens County, South Carolina. The City of Pickens (City) intends to remove the hazardous building materials from the site in support of their goal to demolish the current site structure and redevelop the site for reuse as a plaza, greenspace, and trailhead for the Doodle Trail and to serve as a catalyst for redevelopment in a blighted neighborhood.

The EPA Brownfield Cleanup funding proposal must include, as an attachment, a draft ABCA which briefly summarizes information about the site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup. The draft ABCA should also include information on the effectiveness, the ability of the grantee to implement each alternative, the cost of each proposed cleanup alternative, an evaluation of how commonly accepted climate change conditions might impact proposed cleanup alternatives, and an analysis of the reasonableness of the various cleanup alternatives considered, including the one chosen. The draft ABCA submitted as part of the proposal is intended as a brief preliminary document summarizing the larger and more detailed technical and financial evaluations performed in addressing each of these areas. The ABCA may be modified technically and financially or in more depth relative to each of these areas upon award of funding and in response to community interaction.

Cleanup alternatives were evaluated in accordance with EPA Region 4 protocols and general guidance required prior to implementation of a cleanup design using EPA Brownfields Grant funding. More specifically, this ABCA summarizes viable cleanup alternatives based on site-specific conditions, technical feasibility, resiliency to climate change conditions, and preliminary cost/benefit analyses. Specific cleanup alternatives and associated recommendations are presented in the applicable sections of this report.

1.1 Background

The site is located at 124 Railroad Street in Pickens, Pickens County, South Carolina. The site is an approximate 1.86 acre parcel currently owned by the City of Pickens under Pickens County Tax Map # 4181-16-94-6078. The site was developed as a passenger train depot with rail yard and shipping warehouses as early as 1889. Warehousing facilities on site were expanded in the 1930s. The existing building and former open shed were constructed in the 1960s and operated as a box car assembly operation until approximately 1982 under various entities including Golden Tye, National Railway Utilization Corporation (NRUC) and Emergent Group. After 1982, the facility provided repair services for the box cars until 1995, at which point, the operations were changed to railroad locomotive repair and refurbishing (Pickens Railroad Company) until 2012 when the City of Pickens acquired the site. The building has been vacant since.

1.2 Site Assessment Findings

Terracon conducted a Phase I ESA, dated December 17, 2012 for Pickens Railway Company. The report stated that during the site reconnaissance, field personnel identified two air compressors, interior floor drains, oily stained concrete and soil, a diesel above ground storage tank (AST) and diesel stained soil, and multiple 55-gallon drums, totes and 5-gallon containers for various substances. A records review revealed that the site was incorrectly mislabeled as a FINDS site. Terracon identified the historical use of the site for repairs and maintenance of locomotives, and the release associated with a diesel AST as RECs associated with the site. Terracon recommended soil sampling in the areas of historic repair and maintenance operations and in the area of the diesel AST.

Additionally, the Terracon 2012 Phase I ESA report summarized several prior environmental reports by RUST Environmental & Infrastructure (RUST). In an October 1993 Phase I Site Assessment report, RUST identified several concerns related to the maintenance operations of rail cars and trains on site. RECs were identified with areas of petroleum stained concrete floor/soil in the shop/storage area and exterior areas of the property from various pieces of machinery, a leaking air compressor, a drill press, a former in-ground pit, a former Exxon fuel depot line, a former on-site UST system and various housekeeping related issues. RUST recommended a subsurface soil investigation at several locations throughout the site to determine impacts from the identified concerns. In a December 1993 Phase II report, RUST sampled soils for total petroleum hydrocarbons (TPH) in the location of the former leaking compressor, former Exxon fuel depot line, former UST system, and the transfer wheel pit. The report indicated relatively low concentrations of TPH in the area of the leaking air compressor, the former Exxon fuel depot line and the former UST system. No TPH concentrations were detected from the transfer wheel pit. A sludge sample taken from the interior of the transfer wheel pit revealed elevated TPH concentrations and minor metal concentrations. RUST recommended that the sludge be removed. A March 1996 Phase I Update by RUST indicated that no RECs were identified with the site since the August 1993 assessment as a result of operations at the site or from off-site impacts.

Terracon completed a Soil Investigation Report, dated March 1, 2013, which reported soil investigation activities at the site, recommended from the previous December 2012 Phase I ESA by Terracon. Soil samples collected from four soil borings installed in the identified areas of concern indicated no volatile organic compounds (VOCs) or polycyclic aromatic hydrocarbons (PAHs) above the method detection limit, and several metal constituents detected were well below their respective industrial/commercial and residential Regional Screening Levels (RSLs). Terracon recommended no further assessment be performed at the time; however, the removal of the diesel AST and the excavation of 3 feet of the underlying soils was recommended.

In response to the recommendations from the March 2013 Soil Investigation Report, Terracon oversaw the removal of the diesel AST and soil excavation activities. Terracon completed a Soil Excavation Letter, dated May 31, 2013, which reported soil excavation activities associated with the diesel AST. During these activities, approximately 32 tons of soil were removed from the base of the former diesel AST. Terracon concluded that the diesel impacted soil was removed and properly disposed, and further stated that no additional actions were warranted.

In November 2015, Terracon completed a Phase I ESA and an Asbestos and Lead-Containing Paint Survey on the site. The Phase I ESA identified no RECs associated with the site; however, the Asbestos and Lead-Containing Paint Survey identified regulated quantities of asbestos in silver paint and tar on a metal roof system, base flashing on the office roof, brown/ black window/ door caulk, window glazing compound, felt/mastic on an exterior wall, 9-inch beige and brown floor tile within the office, brown sheet vinyl within the office, 12-inch brown floor tile, drywall joint compound, flashing on a former awning, flashing on a metal compressed gas storage shed roof, and black sink undercoating. Additionally, mastic at roof drain elbows in the warehouse building and apparent thermal system insulation (TSI) debris located in the crawlspace were unable to be sampled due to safety concerns; however, based on visual observations, these materials were assumed to contain asbestos. Lead containing paint was identified in samples of several paint systems present throughout the structure. Samples of black paint on interior block walls and white paint on interior wooden walls contained lead at concentrations in excess of 0.06% (by weight) which is the criterion for classification as “lead based paint” in South Carolina.

The Asbestos and Lead-Containing Paint Survey recommended that that identified asbestos containing materials (ACM) be removed by a South Carolina licensed asbestos abatement contractor prior to demolition of the structure and that third-party asbestos air monitoring be performed during the abatement of the friable materials. Preparation of an asbestos removal work plan was also recommended. Additionally, Terracon recommended that all paint systems be managed as “lead containing” and that the proposed waste disposal facility be notified for pre-approval prior to the material being shipped offsite.

The following table provides a summary of the ACM that were identified in the structure.

Description	Analytical Result	Location	Condition	Estimated Quantity
Roof Coating	2.4%-5% Chrysotile	Northwestern Metal Roof System	Good	1500 s.f.
Black Mastic on Roof Drain Assemblies	Assumed Positive	Warehouse Area	Good	20 s.f.
Base Flashing	5% Chrysotile	Western Office Roof Section	Good	150 s.f.
Brown/Black Window/Door Caulking	8% Chrysotile	Break Room Area	Good	10 s.f.
Glazing Compound	3% Chrysotile	Northern Side of Structure	Damaged	30 s.f.
Felt/Mastic	4% Chrysotile	Eastern Exterior Wall	Good	500 s.f.
9-Inch Beige Floor Tile	5% Chrysotile	Office Area	Good	1,200 s.f.
9-Inch Brown Floor Tile	4% Chrysotile	Office Area	Good	1,200 s.f.
Sheet Flooring	10% Chrysotile	Office Area	Good	600 s.f.
12-Inch Brown Floor Tile	2% Chrysotile	Office Area	Good	50 s.f.
Drywall Joint Compound (ceilings and walls)	2% Chrysotile	Office and Break Room Areas	Good	2,500 s.f.
Flashing on Metal Roof	5% Chrysotile	Compressed Gas Storage Area	Good	20 s.f.
Black Sink Undercoating	2% Chrysotile	Break Room	Good	5 s.f.
Apparent TSI Remnants	Assumed Positive	Crawlspace	Damaged	5 c.f.

2.0 PROJECT GOAL AND RE-USE PLAN

In May of 2014, the Pickens Doodle-Line Rail-to-Trail Feasibility Study was completed for the partnership between the City of Easley and the City of Pickens. This study included developing trail heads in each City (for Pickens, the former rail depot property will serve as the trail head). In 2015, the two Cities constructed the 7.5 mile Doodle Trail in between their Trail Head properties. In 2015, the City of Pickens completed a Trail Head design plan which included the eventual demolition and cleanup of the railroad buildings when funding becomes available. In 2016, the City is planning to extend the Doodle Trail to the southeast edge of the historic downtown, construct restrooms, and develop greenspace, a plaza, educational garden, and community space utilizing the Former Rail Depot site. The development of the Doodle Trail and Trail Head were also addressed in the City's Master Plan developed in 2012.

EPA brownfield cleanup funding will be used to abate ACM from the site structure prior to demolition using other funding sources. This allows immediate and definitive resolution of the public health issue, while final demolitions can then proceed on a schedule that time and resources allows without worry or expense of maintaining and isolating damaged materials from public exposure. Throughout demolition, all paint systems will be managed and disposed of as “lead-containing.”

3.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

The regulated contaminant of concern for remedy is asbestos. Asbestos is the name given to a group of six different fibrous minerals that occur naturally in the environment. Asbestos minerals have separable long fibers that are strong and flexible enough to be spun and woven and are heat resistant. Because of these characteristics, asbestos has been used for a wide range of manufactured goods, mostly in building, friction products, heat-resistant fabrics, packaging, gaskets, and coatings. Asbestos fibers can enter the air or water from the breakdown of natural deposits and manufactured asbestos products. Asbestos fibers do not evaporate into air or dissolve in water. Small diameter fibers and particles may remain suspended in air for a long time and be carried long distances by wind or water before settling down. Larger diameter fibers and particles tend to settle more quickly. Asbestos fibers are not able to move through soil. Asbestos fibers are generally not broken down to other compounds and will remain virtually unchanged over long periods. Exposure to asbestos usually occurs by breathing contaminated air in workplaces that make or use asbestos. Asbestos is also found in the air of buildings containing asbestos that are being torn down or renovated. Asbestos exposure can cause serious lung problems and cancer. More detailed information on asbestos is attached as the Agency for Toxic Substance and Disease Registry’s ToxFAQ™ for Asbestos.

Lead-based paint (LBP) is regulated by the EPA and SCDHEC for removal and disposal purposes. The EPA defines LBP as paint, varnish, stain, or other applied coating that contains lead equal to or greater than 1.0 mg/cm^2, 5,000 mg/kg, or 0.5% by dry weight as determined by laboratory analysis. The SCDHEC regulations require that painted demolition debris with a lead concentration greater than 0.06% by weight or 0.7 milligrams per square centimeter (mg/cm^2) be disposed in a permitted Class II or Class III landfill. Paint systems were observed to be in good condition during a November 2014 survey performed by Terracon. Since the redevelopment plan for the Site includes complete demolition of the onsite structure it is not required to abate or encapsulate the LBP-coated materials provided that the paint is left intact on the

substrate. Therefore, although lead containing paint is present on the Site, it is not considered to be a contaminant of concern.

3.1 Cleanup Responsibility

The City of Pickens will be the cooperative agreement recipient responsible for hiring contractors. The City will use a qualified Environmental Professional to assist with contracting documents, cleanup contractor oversight and final documentation. The cleanup will be conducted by an asbestos abatement contractor licensed in the State of South Carolina. A demolition permit will be obtained from the South Carolina Department of Environmental Control (SCDHEC) and local agencies. Applicable documentation will be submitted as required to the SCDHEC.

3.2 Cleanup Standards

Standards have been established by the Occupational Safety and Health Administration (OSHA) to limit exposure of workers in the workplace. There are two types of short-term limits, as follows:

- STEL (short-term exposure limit): 1.0 PCM f/cc (fibers per cubic centimeter as detected using phase contrast microscopy).

- TWA PEL (8-hour time-weighted average permissible exposure level): 0.1 PCM f/cc (Source: USEPA, 2003 – Libby Asbestos Site Residential/Commercial Cleanup Action Level and Clearance Criteria Technical Memorandum, Draft Final – December 15, 2003).

The asbestos NESHAP (40 CFR Part 61, Subpart M) regulates asbestos fiber emissions and asbestos waste disposal practices. It also requires the identification and classification of existing building materials prior to demolition or renovation activity. Under NESHAP, asbestos-containing building materials are classified as either friable, Category I non-friable or Category II non-friable ACM. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure. Category I non-friable ACM includes packing materials, gaskets, resilient floor coverings and asphalt roofing products containing more than 1 percent (%) asbestos. Category II non-friable ACM are non-friable materials other than Category I materials that contain more than 1% asbestos.

Friable ACM, Category I and Category II non-friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting or abrading and which could be crushed or pulverized during anticipated demolition activities are considered regulated ACM (RACM). RACM must be removed prior to renovation or demolition activities.

In the state of South Carolina, asbestos activities are regulated by the Department of Health and Environmental Control (SCDHEC) under the SCDHEC Regulation 61-86.1 Standards of Performance for Asbestos Projects. The SCDHEC requires that any asbestos-related activity conducted in a public building be performed by personnel licensed by the SCDHEC. The owner or operator must provide the SCDHEC with written notification of planned abatement and removal activities prior to the commencement of those activities. The SCDHEC requires four day notification for non-friable projects and 10 day notification for

RACM projects. Asbestos abatement must be performed by SCDHEC-licensed asbestos abatement contractors. A SCDHEC-licensed Project Designer shall prepare a written abatement design for each abatement project involving the removal of greater than 3,000 square, 1,500 linear, or 656 cubic feet of RACM. Third-party air monitoring must be conducted during the abatement of friable (regulated) ACM. The SCDHEC asbestos regulations can be found at http://www.scdhec.gov.

3.3 Laws & Regulations Applicable to the Cleanup

Asbestos is regulated by the AHERA, the Toxic Substance Control Act (TSCA), the Clean Air Act (CAA), and the SCDHEC R.61-86.1. Further, to protect asbestos abatement workers, abatement work must be performed in accordance with OSHA asbestos regulations as promulgated in Title 29 of the CFR, Section 1926.1101. The following work practices should be followed prior to the initiation of demolition activities on the project site:

- Prepare abatement specifications by an SCDHEC licensed Project Designer;
- Notify the SCDHEC of intention to demolish by the required notification form and receive approval for abatement activities;
- Remove all ACM from facility being demolished before disruptive activity begins;
- Handle and dispose of ACM in an approved manner (USEPA, 2006a: Asbestos/NESHAP Regulated Asbestos-Containing Materials Abatement and SC R.61-86.1);
- Perform third-party asbestos air monitoring prior to, during, and at the conclusion of the abatement activities by an SCDHEC licensed asbestos Air Sampler; and,
- Prepare an asbestos abatement and air monitoring report at the conclusion of the project.

4.0 EVALUATION OF CLEANUP ALTERNATIVES

Asbestos is considered a hazardous substance relative to cleanup grant funding. EPA proposal guidance requires the ABCA, at a minimum, to consider two different cleanup remedies and a “no action” alternative. Asbestos mitigation in the environmental industry is an established practice. Due to its chemical and physical nature, asbestos can, generally speaking, only be managed. Unlike chemical contamination, it cannot be readily altered or broken down. The industry has historically evolved two basic approaches: removal with off-site management and in-place isolation and on-site management.

In addition to effectiveness, implementability, and cost considerations, consideration was given to the sustainability of cleanup alternatives in regard to current and future climate change concerns. According to the National Oceanic and Atmospheric Administration’s (NOAA) National Climate Assessment, the primary climate change conditions identified for the southeast region include increased temperature, decreased water availability, and rising sea levels. Increased temperature and decreased water availability have been identified as site-specific climate change considerations and the resiliency of each cleanup alternative will be evaluated against these considerations.

4.1 Cleanup Alternatives Considered

To address hazardous substances at the Site, three different alternatives were considered. These alternatives are outlined below. The following subsections present each alternative in greater detail, including estimated costs and potential contingency items:

- Cleanup Alternative A: ACM Removal Pre-Demolition
- Cleanup Alternative B: ACM Disposal Post-Demolition
- Cleanup Alternative C: No Action

Cleanup Alternative A: Pre-Demolition ACM Removal

Alternative A includes conventional removal/abatement of ACMs using standard industry practices. Abatement areas would be contained prior to the removal using polyethylene sheeting, controlled negative pressure conditions and/or other applicable measures to prevent asbestos fiber migration beyond the work zone. Some abatement procedures may require wet removals to further control potential spreading of damaged or friable asbestos and airborne particulates. During and following the abatement, ACM dust, particulates and other residual materials would be vacuumed and filtered out using a high efficiency particulate air (HEPA) filtration system.

ACM would be removed under an SCDHEC-approved permit and containerized for off-site landfill disposal as a special or regulated waste. The most common removal method is a “bag out” approach that uses labeling bags designed to contain ACM in manageable quantities. Leak-tight containers would be required if wet removals are performed. Landfill disposal authorizations would be secured prior to initiating the work. These authorizations are specific to the disposal facility.

ACM removal must be performed by a South Carolina-licensed abatement contractor. In addition, this work requires a 10 business day notification to the SCDHEC Asbestos Section and appropriate coordination with SCDHEC representatives, as needed, throughout the abatement project. An air monitoring program will be required for removal of friable or highly damaged ACM. Final clearance would be granted following a visual examination of the work area followed by receipt of acceptable air quality testing results (for RACM).

4.1.1 Effectiveness – Including Climate Change Considerations

The ACM is permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants that produce unacceptable public risk. The remedy usually does not significantly alter structural conditions due to typical ACM uses. Demolition restrictions would not remain following demonstration of clearance criteria. Excluding clearance sampling, follow-up inspections and maintenance will not be required. With removal and off-site disposal of contaminants, the approach requires no special post-remedy institutional or land use controls for the property.

Potential disadvantages; Non-friable ACM in good condition presents limited exposure risks prior to removal. Removals are likely to damage non-friable ACM and trigger additional containment and air monitoring regardless of previous conditions. Abatement costs can increase if previous estimates do not quantify all ACM, particularly in hard to access locations. Complete removal may be tedious and time consuming, with diminishing cost/benefit returns as the project continues. This option creates a waste generation stream and associated liabilities for the generator.

The site-specific climate change conditions identified include increased temperature and decreased water availability. Removing all ACM from the site ensures that the cleanup effectively addresses these climate change considerations.

4.1.2 Implementability

This alternative is technically achievable. It is a mature remedy common in the remediation industry. The approach requires specialized equipment readily available in the local demolition and engineering markets. A specialized labor force exists in South Carolina to accomplish the remedy. The implementation period is shorter-term and can be conducted during periods of freezing weather.

4.1.3 Cost

Based upon Terracon's experience with similar projects, the estimated cost to remove ACM from the structure is approximately $115,000, including interim security, professional environmental consulting services, and waste removal and disposal.

4.2 Cleanup Alternative B: ACM Disposal Post-Demolition

Alternative B involves demolition of structures intact with ACM. Structure debris would be disposed of in a regulated landfill similar to Alternative A. Demolition, handling, loading and transportation will require wetting procedures and air monitoring procedures. In this process it becomes necessary to assume that all structure debris is ACM and must be handled and disposed accordingly.

This approach hinges on structures being unsafe to the extent that the abatement contractor could not safely implement Cleanup Alternative A. This approach will require special approval by SCDHEC. ACM demolition must be performed by a South Carolina licensed abatement contractor. This approach, if approved by SCDHEC, has the positive aspect of accelerating the period of abatement to that of the demolition and disposal.

Adversely, this approach requires special approval by SCDHEC that will be made on a project-specific basis, lengthening the process of abating community risk. The potential for public airborne exposure increases as demolition occurs as the ability to control airborne asbestos becomes limited to the adequacy of wetting procedures. This approach greatly increases the volume of material that must be handled as ACM, thereby taking greater volume from existing capacity of regional landfills. This option also creates a waste generation stream and associated liabilities for the generator.

4.2.1 Effectiveness – Including Climate Change Considerations

The ACM is permanently removed. This approach is technically effective as a definitive and direct physical elimination of the contaminants available to public exposures. Follow-up inspections and maintenance will not be required. With removal and off-site disposal of contaminants, the approach requires no special post-remedy institutional or land use controls for the property.

The site-specific climate change conditions identified include increased temperature and decreased water availability. Removing all ACM from the site ensures that the cleanup effectively addresses these climate change considerations.

4.2.2 Implementability

This alternative is technically achievable although it does require a work practice variance from SCDHEC. It is a mature remedy common in the remediation industry. The approach requires specialized equipment readily available in the local demolition and engineering markets. A specialized labor force exists in South Carolina to accomplish the remedy. The implementation period is medium-term because it requires all demolition waste to be managed as asbestos-containing or asbestos-contaminated. This option can be conducted during all periods of weather.

4.2.3 Cost

The onsite structure is approximately 20,000 s.f. which would produce approximately 5,700 cubic yards of total debris[1]. This material would have to be considered ACM for disposal. Using $60/cubic yard disposal cost of ACM material (based on Terracon's experience) increases the disposal cost by approximately $280,000. There would also be additional costs for professional environmental consulting services in order to obtain and maintain approval of a work practice variance from SCDHEC for this option. Comparatively, this alternative is cost-prohibitive.

4.3 Cleanup Alternative C: No Action

The "no action" scenario is required by the EPA ABCA process. This alternative is to not address contaminants and trust that exposures as airborne particulate/fibers or dust through further weathering and degradation of the structure does not make contaminants available for human exposure by inhalation.

4.3.1 Effectiveness

This alternative is deemed ineffective and unacceptable for continued Brownfield redevelopment for this Site because:

- It is likely to be considered unacceptable to the community because citizens, nearby workers and construction workers could unknowingly be placed at risk in the future. No-action provides neither remedy nor preventive value to site conditions or in support of improved public health.

[1] Debris Estimating Field Guide - FEMA 329, September 2010. Federal Emergency Management Agency, Department of Homeland Security.

- This approach is unacceptable technically in that the microscopic asbestos fibers are known human carcinogens and provide no readily discernable exposure warning mechanism such as odor or other sensory identification. Without an expensive and long-term outdoor air/dust sampling program, there is no ability to identify if and when residual contaminants may be available for exposure.

- The continued presence of ACM in the building would continue to pose a long-term health risk to the public and also to workers entering the building. The No Action Alternative would make no progress toward achieving the goals of reduction of health risks to the surrounding public and facilitating the demolition of the building for redevelopment.

4.3.2 Implementability

By its definition, taking no action precludes a discussion of implementation. The structure would be left in the unused state in which it currently exists. The identified ACM would still pose a hazard to those entering the building and asbestos fibers would continue to be released to ambient air. The value of the building would continue to decrease due to deterioration. Regardless, the presence of ACM will require the City to have to continue to use portions of its maintenance budgets to stabilize ACM damage through covering open breaches into the structure and isolation of building from unauthorized entry.

4.3.3 Cost

By its definition, taking no action precludes a discussion of cost to implement. This cleanup alternative would not include any specific efforts to remove or maintain ACM in place. There would be no direct cleanup costs associated with this alterative. Further, this alternative may later result in demolition complications, delays and increased demolition costs due to ACM remaining within the structures. Direct costs associated with the No Action Alternative and associated non-use of the building would consist of providing site security. Indirect costs could include the continuing inability to utilize the property for public benefit as is currently planned.

Expanded costs could occur if fugitive asbestos is released during future storms or weathering of damaged structures that might result in secondary deposition and contamination of soils. This would impair re-use and value of surrounding property adjacent to the structure.

4.4 Cost Comparison of Alternatives

The table below presents a summary of the estimated costs for all alternatives under consideration. There would be no capital cost if the site were to remain as an unused, vacant building.

ALTERNATIVE	CAPITAL COST	ANNUAL COST
A – Pre-Demolition ACM Removal	$115,000*	N/A
B – ACM Disposal Post-Demolition	$485,000†	N/A
C – No Action	$0	$4,000‡

* - Estimate does not include costs associated with demolition, only the tasks identified for each alternative.
† - Estimate includes costs for demolition due to the nature of the alternative (total removal).
‡ - Includes costs for annual re-inspection of ACMs to document current condition.

5.0 RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup approach is Alternative A: Asbestos Removal Pre-Demolition. This alternative would address exposure risks using a proven approach consistent with recognized industry standards while at the same time easily garnering SCDHEC approval. This option would remain comparably cost-effective under almost all abatement scenarios and building conditions. ACM removal would not require the need for subsequent inspections, maintenance and/or regulatory oversight. This alternative addresses ACM liabilities, potential contaminant sources or potential limitations to future land use and brownfields redevelopment potential consistent with the City's goals and re-use planning.

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 12/17/2015

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Pickens

* b. Employer/Taxpayer Identification Number (EIN/TIN): 57-6001095

* c. Organizational DUNS: 0513928010000

d. Address:

* Street1: 219 Pendleton Street
Street2:
* City: Pickens
County/Parish:
* State: SC: South Carolina
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 29671-2458

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Bruce
Middle Name:
* Last Name: Evilsizor
Suffix:

Title: City Administrator

Organizational Affiliation:

* Telephone Number: 864-898-8160
Fax Number: 864-878-0450

* Email: bevilsizor@pickenscity.com

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OSWER-OBLR-15-06

* Title:

FY16 Guidelines for Brownfields Cleanup Grants

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

City of Pickens Brownfields Cleanup Grant -- Doodle Trail Head

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 3

* b. Program/Project: 3

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/03/2016

* b. End Date: 09/29/2017

18. Estimated Funding ($):

* a. Federal	127,000.00
* b. Applicant	26,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	153,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ____.

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name: Bruce

Middle Name:

* Last Name: Evilsizor

Suffix:

* Title: City Administrator

* Telephone Number: 864-898-8160

Fax Number: 864-878-0450

* Email: bevilsizor@pickenscity.com

* Signature of Authorized Representative: Bruce Evilsizor

* Date Signed: 12/17/2015