City of Anderson, South Carolina
FY19 Brownfields Assessment Grant

R04-19-A-067

1. Applicant Identification: City of Anderson
   401 South Main Street
   Anderson, South Carolina 29624

2. Funding Requested:
   a. Assessment Grant Type: Community-wide
   b. Federal Funds Requested:
      i. $300,000
      ii. The City of Anderson is not requesting a waiver
   c. Contamination: Hazardous ($200,000)/Petroleum ($100,000)

3. Location:
   a. City of Anderson
   b. Anderson County
   c. State of South Carolina

4. Property Information for Site-specific Proposals: N/A

5. Contacts:

Project Director:
Maurice McKenzie, AICP
Planning and Development Director
City of Anderson
401 S. Main Street
Anderson, SC 29624
(864) 231-2222
MMcKenzie@cityofandersonsc.com

Chief Executive/Highest Ranking Official:
The Honorable Terance Roberts
Mayor
City of Anderson
401 S. Main Street
Anderson, SC 29624
(864) 231-2200
troberts@cityofandersonsc.com

6. Population:
   City of Anderson: 27,011 (2017 American Community Survey 5-year estimates)

7. Other Factors Checklist:

Other Factors	**Page #**
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority site(s) is in a federally designated floodplain.	1
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	3
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	

8. Letter from the State or Tribal Environmental Authority: Attached

dhec
Healthy People. Healthy Communities.

January 4, 2019

Barbara Alfano
Region 4 Brownfields Coordinator
United States Environmental Protection Agency
Resource Conservation and Restoration Division
61 Forsyth Street SW
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Community-Wide Assessment Grant
City of Anderson, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the City of Anderson's application for a Brownfields Community-wide Assessment Grant. The grant will facilitate environmental assessmentof the Anderson Mill, the Appleton Mill, and the area sandwiched between them in the heart of Anderson, South Carolina.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the City 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,

Henry Porter, Chief
Bureau of Land and Waste Management

cc: Chris McClusky, Upstate EA Anderson
Robert Hodges, Manager, Brownfields Program

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area: On June 29, 2017, the City of Anderson's local paper, *Independent Mail*, ran an article entitled "Fate of Mill Property is Key to Neighborhood's Future." The first two lines of the article articulated the consensus of an entire community. "In its heyday, Anderson's first cotton mill employed hundreds of employees and served as an anchor for the city's downtown. Today…the site…consists of heaping piles of rubble, the skeletal remains of buildings and overgrown weeds. But the property remains critically important to the future of a neighborhood known as the alphabet streets." The former mill remains in a dilapidated state – and the future of the Alphabet Streets (ABC) neighborhood remains hanging in the balance.

Anderson, South Carolina, was founded in 1826. Situated in the northwest corner of the state, it encompasses about 15 sq. mi. and serves as both the seat and urban core for an otherwise rural Anderson County. With a deeply rooted history in the textile industry, Anderson was one of the leading textile centers in the South. The first cotton gin in the world operated by electricity was located in Anderson, and between 1920 and 1960 local mills manufactured about a quarter of the nation's output of cotton yarn and cloth. (TRC Garrow Associates, August 2002)

Over the past few decades, Anderson lost many of its mills due to an overall industry decline. According to data from Census.gov, between 1999 and 2018 Anderson County lost approximately 3,724 jobs in the textile industry – a 62% decrease in employment in that industry sector alone. (Note: the Census.gov website has no data prior to 1999, when textile mill employment reached its peak.) For each job lost at the textile mills, indirect supporting jobs were also lost in the community. No longer the economic drivers of their heydays, the abandoned sites now are a blight on the surrounding neighborhoods and commercial areas.

The targeted area for the City of Anderson's brownfields assessment project is the ABC Streets Community and immediate surrounding areas (Census Tract 7). The neighborhood is bound to the west by the former Appleton Mill, to the east by the former Anderson Mill, a rail line, and a 4-lane commercial corridor lined with vacant storefronts and brownfields. These obstacles cut the community off from a walkable connection to Anderson's emerging downtown and limits access to jobs, services, and amenities.

ii. Description of the Priority Brownfield Site:

The community compiled a preliminary inventory based on concerns and potential for redevelopment, identifying the Anderson Mill site as the highest priority. Upon award of EPA Brownfields Assessment funds, the City will work with the community to confirm site priorities:

Anderson Mill (19.8 acres; within 50 feet of residences). This priority site is located between the ABC Community's residences and downtown. **Whitner Creek flows directly through the property on the western side,** and a portion of this property is in a **federally designated floodplain.** A neighborhood baseball park abuts the property further to the west. The large spinning mill operated between 1889 and 1990 and served as the City's major employer for years. Two fires (1995, 2007) and salvage operations left most of the buildings partially or completely destroyed. Remnants remain across the property including exterior walls, a tower, and large piles of debris. The site is partially fenced, but not securely contained, and is entirely covered with thick vegetation that poses safety and pests concerns. In 1999, the City received an EPA Assessment Grant and performed some environmental assessment. At the time, there were concerns regarding drum and coal storage, previous USTs and hydraulic lifts, and asbestos and lead paint. Findings included environmental contamination of site soils, surface water, sediments, and groundwater, including high levels of PAHs, chlorinated solvents, metals, pesticides, lead on the site, as well as presence of metals and pesticides in Whitner Creek. There remained unknowns with respect to the site characterization, i.e. vertical and horizontal

extent of contamination and the source of surface water contamination in the creek. The property owner entered into a Responsible Party Voluntary Cleanup Contract (VCC) with the South Carolina Department of Health and Environmental Control (SCDHEC) but never complied with the requirements, so SCDHEC terminated the VCC. The City is interested in redeveloping a portion of the property to extend its greenway/trail system along Whitner Creek; Seacoast Communities, a private developer, is interested in transforming the property into a mixed-use redevelopment. A draft VCC prepared by SCDHEC for Seacoast requires extensive environmental assessment due to activities conducted on the site in the 17 years since the previous assessment and the speculation that asbestos containing materials were used to fill in an excavation on site. The property owner has provided the City written permission to access to the property.

Appleton Mill (34.6 acre; within 15-20 feet of residences). This elongated site (800' wide by 3000' long) spans the entire western edge of the ABC Community. This textile mill operated between 1902 and 1985. In 2001, a large fire consumed much of the mill structures; only the smokestack, building foundations and a few partially demolished structures remain on site along with a storm-water retention pond. Potential concerns include improper use, treatment, storage, generation, and/or disposal of hazardous and petroleum contaminants, (PAHs, solvents and heavy metals), and asbestos and lead based paint. Elevation of the site allows for the migration of potential contaminants to surrounding residential areas. The location of the property (surrounded by the street grid of the ABC Community) makes it ideal for reuse as multi-family housing. Scout Realty, a private developer, has expressed preliminary interest in this site for affordable multi-family housing.

The following four sites were prioritized by the community due to concerns of environmental contamination potentially impacting the community and the sites' high redevelopment potential:

Foundry and Steel Properties – Towers St (4 parcels totaling 6.4 acres; within 600 feet of residences). This site includes five medium-sized industrial buildings and is located between the Anderson Mill site and active railroad tracks. Some buildings are vacant; others underutilized for storage. Environmental concerns include potential contaminants (PAHs and heavy metals) associated with the previous steel manufacturing/storage activities and an old yarn mill, as well as contaminants such as arsenic and creosote associated with the adjacent railroad property.

Foundry and Steel Properties – Main Street (2.95 acres; within 50 feet of residences). Previous uses include light industrial and a car dealership that serviced vehicles. The property includes two abandoned metal buildings and paved parking. Potential contaminations include PAHs and metals, solvent degreasers, PCBs in hydraulic lifts, petroleum, and lead.

Additionally, an abandoned garage/service station (*Hot Shots* – 3 parcels totaling 1 acre; within 50 feet of residences) and two vacant dry cleaners (*Old Star Cleaners* – 0.16 acre; within 80 feet of residences. *Tribble Street Cleaners* – 0.51 acre; within 50 feet of residences) have been identified as problematic sites in the target area.

Additional sites throughout the City will be considered as funding allows and new community priorities are identified.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans

The ABC Community is in one of the City's five "community development focus areas." The brownfields project aligns with the City's Consolidated Plan (2015-2019) goals for affordable housing, public services, public facilities improvements, economic development activities, and blight removal. Priority needs identified by the community during development of these plans include anti-crime, health services, transportation, parks and recreational facilities, elimination of slum and blight, increased economic development and access to jobs, with a strong desire for improved pedestrian and bike connectivity. The 2009 City of Anderson Neighborhood Revitalization Plan specifically identifies

both the Anderson Mill and the Steel and Foundry-Towers Street Site as priority properties for a mix of commercial, residential, and greenspace.

The City's Bicycle and Pedestrian Connectivity Plan (2012) envisions a 23-mile interconnected network, composed of greenway and street-based trails to serve Anderson's transportation and recreational needs. The plan connects neighborhoods (such as the ABC Neighborhood) to local destinations (downtown, Anderson University, AnMed, etc.). Anderson Mill plays a key role in connecting the 5-mile Whitner Creek Trail to downtown Anderson. Included in Seacoast's redevelopment plans is a provision of right-of-way to the City for trail improvements for the greenway. Grant funding is vital to the success of this redevelopment as SCDHEC is requiring extensive assessment: 74 soil samples from 37 locations, 8 monitoring wells, surface water and sediment sampling, a ground-penetrating radar (GPR) survey, etc. in the draft VCC for Seacoast.

Scout Realty Group has expressed interest in the redevelopment of the Appleton Mill site into affordable town homes and apartments. This redevelopment will reconnect the existing street grid (currently interrupted by the massive mill site) to improve traffic flow and reconnect the neighborhood. Due to its location in the middle of the community, the only real viable reuse of the property is for multi-family housing, which is one of the needs outlined in the City's Consolidated Plan. However, the environmental concerns need to be assessed before the redevelopment can progress further. When contacted by City representatives about access, the property owner representative indicated a willingness to participate to help the sale of the property.

ii. Outcomes and Benefits of Redevelopment Strategy

Gaining a better understanding of environmental issues will assist in clean up/redevelopment of blighted properties, making the community more attractive for businesses, jobs, and diverse housing options. Improved access to greenspace/recreational amenities is a key component of the project, particularly on the Anderson Mill site as well as addressing contamination issues in Whitner Creek. The trail system also will provide stronger multi-modal connections to community services, downtown businesses and employment for the target community. Ultimately, the project will result in a healthier, walkable community, with improved air and water quality.

Seacoast's VCC application states that the intended re-use of Anderson Mill is mixed residential, commercial, and office with an estimated 100 permanent jobs and a tax base of $100 million when redevelopment is complete. Further, the application states Seacoast intends to build to **energy efficient** standards, create greenspace within the development, and recycle demolition/building debris. For the priority sites identified, potential benefits include assessment of up to six properties, over 65 acres being made ready for reuse, and creation of a greenway connecting a 5-mile trail. Also, the project will spur renewed pride and investment in the ABC Community and attract employers providing higher paying jobs. Research suggests the project could increase surrounding property values by as high as 15%.[1] With homeownership being the single largest investment for most families, this will translate into increased personal wealth for many residents. The redevelopment of sites assessed under this grant will help Anderson achieve many of its revitalization plans—providing quality affordable housing, jobs, and a more walkable city.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

As a unit of local government, the City is eligible for funding from many state and federal sources. The City has secured funding from Community Development Block Grants, Hospitality Tax, the SC National Heritage Corridor, and the Anderson Area Transportation Study to complete pedestrian trails /greenways. The Anderson County Transportation Committee has provided funding for neighborhood

[1] Frank, Nancy. Benefits of Public Investment in Brownfield Cleanup and Redevelopment, 2014

road upgrades. Private developers of the Anderson and Appleton Mills may take advantage of SC's Textile Communities Revitalization Act that provides tax credits based on rehabilitation expenses incurred when redeveloping a textile mill, ancillary buildings, or adjacent sites. Eligible activities include demolition, environmental remediation, site improvements, and new construction. The state also offers tax credits for voluntary cleanup costs up to $50,000 per year to entities signing VCCs. Organizations may also receive a tax credit for each new full-time job created, exemption from ad valorem taxes, and fee in lieu of taxes with a reduced minimum investment. All removal and remedial actions on VCC sites – public and private – are eligible for low-interest funding from the SCDHEC Brownfields Cleanup Revolving Loan Fund. More importantly, by clarifying the environmental issues, the project will facilitate the private investment of $50 – 60 million in redevelopment, as projected by Seacoast.

ii. Use of Existing Infrastructure

Existing water, sewer, cable, and electricity lines currently servicing the former Anderson and Appleton Mill sites are of the size and capacity needed to support the planned redevelopments. Funding is in place and access is provided for the City to complete the greenway in the Target Area. Additional roads will be needed to connect the street grid through Appleton Mill, and development agreements are available to private developers for reimbursement of some road installation expenses.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

The ABC Community, bracketed by two large former textile mills and adjacent to several other brownfields, is a small and economically challenged area with elevated elderly, minority and impoverished populations. According to the 2017 American Community Survey (ACS) 5-year estimates, 44.1% of individuals living in the neighborhood and **100% of families with children under the age of 5 yrs. are below the poverty threshold** as compared to 33.9% individuals and 32.1% families with children under 5 yrs. in the City. Further, 63.5% of the population in the ABC Community are considered minority as compared to 36.5% in the City, and 20.9% is over 65 vs. 18.7% in the City and 16.6% in the County. Those with the means have moved out of the neighborhood (20.6% of homes in the ABC Community are vacant) and into more affluent areas of the City (12.1% vacancy rate of single-family homes), further exacerbating declining property values. The median home value in the ABC Neighborhood is $51,700 compared to a median home value of $123,200 for the City of Anderson. The small size of the neighborhood coupled with the weak economic conditions ($13,525 per capita income) has made it difficult to attract investment to improve the brownfields.

This grant will help attract private and public investment in the area by clarifying the environmental issues associated with the priority sites and facilitating community outreach and visioning for the redevelopment of the sites. The aforementioned extension of the greenway will provide recreational opportunities and better connect the community to jobs and services in the downtown. The Seacoast and Scout Realty plans offer the possibility of new affordable housing opportunities, as well as commercial and office space with the associated jobs, in the target community.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The ABC Community is largely a low-income, elderly, minority community, and the brownfields exist as substantial blight and negatively impact the health and welfare of the community. The derelict sites attract both neighborhood children and the homeless; unsafe building structures and potential contaminants pose great risks to these sensitive populations. After a fire destroyed most of the Anderson Mill structures in 1995, fire is an ongoing community concern. A smaller fire started on a

pile of pallets at the mill in 2017, causing more damage and increasing fear of nearby residents. Abandoned brownfields also serve as havens for criminal activities. In 2018, the City's Police Department reported over 654 criminal offenses in this community: 202 assaults; 108 drug crimes; 253 home, business and vehicle related thefts; and 91 acts of vandalism (Anderson Police Records).

Access to community services, such as jobs, healthcare, healthy food, and active living amenities is lacking. As the crow flies, the neighborhood is only half a mile from the City's emerging central business district. Yet, pedestrian and bicycle connections are extremely challenging, due to the large brownfield sites and depressed commercial corridors that separate the residents from downtown. Many of the residents live more than a mile from a supermarket, and more than 100 households within the census tract have no access to a vehicle (2017 ACS 5-year Estimates). Some public transit is available in the area, but limited in routes and hours of operation (day-time, weekday only), making it an inadequate source of reliable transportation. One resident indicates that "it can take three hours to make a trip to the grocery store—one hour to get there, one hour to shop, and one hour to get back home." (Andy Gibson, ABC Community resident). Environmental assessment utilizing grant funding will provide an additional incentive for developers (such as Seacoast and Scout Realty) to acquire, cleanup, and redevelop brownfields, reducing blight and environmental contamination and bringing affordable housing, jobs, and greenspace to the targeted area.

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

Recent studies indicate exposure to polycyclic aromatic hydrocarbons (PAHs), a major component of fine particulate matter from mills that burn coal, are commonly associated with onset of asthma and increased asthmatic symptoms.[2] An estimated 8% of the population in Anderson County has asthma, with approximately 8% of both children and seniors suffering from the chronic condition. In relation to its population, the City and the ABC Community have significantly higher rates of asthma related in-patient and emergency room visits than the county or state (see following table). As Anderson Mill and the other brownfield sites continue to deteriorate, additional particulate matter will become airborne, potentially carrying asbestos, mold, and other harmful contaminants, and further exacerbating health issues. This particularly impacts the elderly population considered an at-risk population for air quality sensitivities.

HOSPITAL VISITS W/PRIMARY DIAGNOSIS OF ASTHMA

Residence	In-Patient Discharges	In-Patient Rate	ER Visits	ER Rate
Anderson ZC 29624	30	195.21	88	572.62
Anderson County	206	106.09	609	313.64
State of South Carolina	4501	91.98	24,356	497.73
Rates expressed per 1,000 population. Estimates based on 29624 ZIP Code Tabulation Areas (ZCTA) which may differ from actual ZIP code or municipal limits.				

According to SCDHEC, between the years 2011 and 2015, the most common incidences of cancer in the target area (ZIP Code 29624) were lung, colon/rectum, female breast, and prostate. Some types of cancer were observed at much higher rates than expected: 41% more Lung & Bronchus Cancers and 64% more colon/rectum. During the same period, over 210 individuals in the target area died from cancer, most commonly from cancers of the lung, colon/rectum, and female breast cancers. Deaths from lung and colon/rectum cancers were substantially higher than expected, 24% and 81% more respectively.[3] Per the American Cancer Society, factors other than smoking can increase a person's risk of developing lung cancer, including asbestos, arsenic, nickel chromates, coal products, fuels, and

[2] Karimi, P et al, Polycyclic aromatic hydrocarbons and childhood asthma. Eur Journal of Epidemiology. 2015 Feb. 30(2):91-101. https://www.ncbi.nlm.nih.gov/pubmed/25600297, January 2019.

[3] South Carolina Department of Health and Environmental Control. Community Cancer Assessment, Summary of Cancer Incidence and Mortality 2011-2015, ZIP Code 29624 (Anderson, SC), January 2019.

diesel exhaust, as well as air pollution. Many of those are contaminant concerns associated with the targeted brownfield sites. Migration also is a concern, potentially effecting neighboring properties and water quality in Whitner Creek. As the sites are assessed, appropriate remediation and mitigation strategies can be developed to reduce the exposure risks to these contaminants that may be contributing to the higher than expected adverse health effects.

Obesity, unhealthy diet, and lack of exercise also are linked to higher risks for any type of cancer, but particularly for cancers of the breast, pancreas, colon/rectum and prostate. Over a third of adults (34%) in Anderson County are estimated to be obese.[4] The rate of diabetes is higher in the county than in the state: 29% and 27%, respectively for the total population, 30% and 27%, respectively for just the elderly population. **Error! Bookmark not defined.** Additionally, 66% of the county's seniors have hypertension, higher than the 63% rate at the state level. Limited access to healthy recreational activities may be a contributor to some of these issues. Almost a third (28%) of adults in Anderson County report no leisure time activity.[5] This project will help facilitate the redevelopment of the Anderson Mill site and the proposed trail along Whitner Creek, creating additional opportunities for recreation and pedestrian access to services and retail in the downtown.

According to the Centers for Disease Control and Prevention, "Living near a hazardous waste site has been identified as a possible risk factor for birth defects including: spina bifida, cleft lip or palate, gastroschisis, hypospadias, chromosomal congenital anomalies such as Down syndrome, and some heart and blood vessel defects."[6] Data culled from SCDHEC Birth Defect Program (for the year 2016-17) indicate a marked increase in the number of babies born with birth defects in the target area ZIP code of 29624. This population has prevalence of 500 per 10,000 births compared to 275 in Anderson County and 207 in South Carolina. This project will help identify potential environmental hazards at the priority sites so appropriate measures can be taken to reduce the risk to the target area.

(3) Economically Impoverished/Disproportionately Impacted Populations

The ABC Community is an impoverished area with significant environmental justice challenges. According to the EPA's Environmental Justice Screening and Mapping Tool, the ABC Community is in the upper percentile for every variable on the Environmental Justice (EJ) Index, specifically for Respiratory Hazards (80-90), Lead Based Paint (95-100), and Cancer Risk (80-90).[7] The EPA EJMAPPER tool further indicates the economically impoverished conditions the ABC Community faces. In addition to the poor environmental indicators noted, the neighborhood also ranks in the upper percentile for every variable on the demographic indicators portion of the Environmental Justice (EJ) Index, specifically for Low Income (95-100), Less than High School Education (95-100), and Minority Population (90-95). The brownfields bracketing the neighborhood are disproportionately impacting the target area. Homes sold in the ABC Neighborhood during 2017-2018 closed at an average price of $23,800 – or $14/ft^2, while homes sold in the neighborhood just to the north of the Appleton Mill closed at an average price of $142,400 or $54/ft^2 in the same period (www.zillow.com). The depressed market along with high rental rates (58.9% in the neighborhood compared to 29.4% in Anderson County) and a high vacancy rate (20.6% unoccupied homes in the neighborhood) makes stabilizing the community challenging and severely limits opportunities for residents to increase personal wealth through home ownership. Assessment and remediation of the brownfields will only improve property values over time and alleviate the environmental justice concerns present in the community. Access to walkable jobs is currently limited due to the disconnect between the neighborhood and the growing downtown. The assessment and cleanup of the Anderson

[4] Behavioral Risk Factor Surveillance System, 2015 data as cited on http://www.countyhealthrankings.org/app/southcarolina/2017/rankings/anderson/county/outcomes/overall/snapshot, October 2017.
[5] CDC's Behavioral Risk Factors/US Census Bureau's Population Estimates 2013 data cited on countyhealthrankings.com, October 2017.
[6] Centers for Disease Control and Preventionl. https://ephtracking.cdc.gov/showBdEnv
[7] EPA EJSCREEN Tool, https://ejscreen.epa.gov/mapper, accessed January 2019.

and Appleton Mills will help connect the neighborhood with jobs, services, affordable housing, and amenities, thereby reversing these negative trends.

b. Community Engagement

i. Community Involvement

Many active community organizations will guide the City's brownfields project. The ABC Community has active community involvement via ABC (A Better Community) and the Westside Community Coalition neighborhood groups. These groups are composed of residents within the ABC Community and will be actively involved in the project. Additional partners will host meetings, assist with information sharing, solicit feedback, and provide support to the project.

Community Project Partners

Partner Name	Point of contact (name, email & phone)	Specific role in the project
A Better Community (ABC)	Rhonda Jordan Rjordan5216@gmail.com 864-640-6604	Assist with site selection and prioritization, redevelopment planning, and dissemination of information to community members; Serve on Brownfields Task Force (BFTF)
Westside Community Coalition	Rev. Mashon Nance Mashon.rose@juno.com 864-934-0106	Assist with site selection and prioritization, redevelopment planning, and dissemination of information to community members; Serve on BFTF
Capstone Church	Rev. David Barfield david@capstonechurch.com 864-222-2114	Host public meetings and assist in disseminating information and soliciting feedback
United Way of Anderson	Carol Burdette Carol.burdette@uwandersoncty.com 864-226-3438	Assist with site selection and prioritization, redevelopment planning, and dissemination of information to community members; Serve on BFTF
AnMed	Bill Manson Bill.manson@anmedhealth.org 864-512-1000	Answer questions about possible health effects of hazardous substances on sites
Anderson County Chamber of Commerce	Pamela Christopher pchristopher@andersonscchamber.com 864-226-3454	Assist with site selection and prioritization, redevelopment planning, and dissemination of information to community members; Serve on BFTF

ii. Incorporating Community Input

The City will build upon its existing neighborhood outreach already established within its redevelopment program, asking representatives from the ABC Community and community partners to serve on the Brownfields Task Force. The Task Force will meet on an approximate quarterly basis to guide site selection activities, ensure project alignment with community interests and needs, promote the project to property owners/potential investors, and communicate project updates. The City plans to host at least two public meetings to present project updates, solicit feedback, and invite community participation. In the redevelopment planning stages of specific properties, the City will conduct visioning workshops.

Public participation will be encouraged throughout the duration of the project. With a large elderly and poor population, easily accessible, low-tech communication methods will be most effective. Therefore, in addition to website updates and presentations to City Council, the City will employ church bulletins, newspaper press releases, local radio announcements, brochures/flyers, and presentations to neighborhood groups to communicate progress. In addition, Task Force members will report/gain feedback at their regular respective neighborhood meetings. With a small Hispanic population in the neighborhood, the City will produce materials in Spanish and engage a translator if needed. The City will maintain meeting sign-in sheets for follow-up communication. Public comments and input will be considered and incorporated (if applicable) into the project, and all public comments/inquiries will be responded to by the Project Team in a timely manner. The City will rely

on the Task Force to consider and make recommendations based upon the public input.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks and Activities

The City of Anderson is prepared to implement the following planned tasks:

Task 1 – Project Management and Reporting – The City's Project Manager will oversee the grant administration and compliance with EPA cooperative agreement terms and conditions. He will ensure tasks are completed efficiently and will be responsible for oversight of the Qualified Environmental Professional (QEP) and other consultants, as needed to complete the project tasks. He will hold monthly project team meetings to review the project and make corrections as needed to stay on schedule and make appropriate progress. With contractor assistance, the City will complete EPA quarterly reports, DBE forms, and ACRES database entry/updates, and an ongoing review of programmatic grant elements. City staff will also attend national and regional training workshops during project to learn and share success stories. The City will contribute in-kind staff labor for project management, oversight of consultants, and reporting.

Task 2 – Community Outreach – The City's Project Manager will lead the community outreach efforts with contractor support. Specific tasks include development of a community involvement plan, establishment (and updates) of an information repository for all project documents, development and updates of a project specific website, and preparation of brochures, fact sheets, and press releases. Brownfield Task Force meetings will occur approximately quarterly, with at least two public meetings at appropriate intervals (to introduce the project, discuss assessment results, and/or invite input for redevelopment plans) and meetings with property owners and developers.

Task 3 – Site Assessments – With oversight from the City's Project Manager, the QEP consultant will lead the site assessments tasks. The project team will confirm the brownfields inventory and prioritization with input from the Task Force at the first quarterly meeting. Phase I and II Eligibility Forms will be completed for EPA approval, and petroleum determinations will be obtained from SCDHEC. Phase I ESAs will be initiated in the second quarter and continue as funding allows until to the ninth quarter. Phase I ESAs will be performed by the QEP and in accordance with American Society of Testing and Materials Standard E1527-13 and the EPA All Appropriate Inquiry Final Rule. Phase II ESAs will be initiated in the third quarter after approval of Quality Assurance Project Plans and will continue as funding allows until the tenth quarter. Phase II ESAs will be conducted by the QEP in accordance with ASTM E1903-11. Asbestos and Lead-based Paint surveys and other assessments will be completed depending on the need at each priority site.

Task 4 - Cleanup and Redevelopment Planning – With oversight and significant participation from the City staff, the selected consultant will lead cleanup and redevelopment planning activities. Subsequent to assessment activities, remediation and cleanup plans will be developed for high priority sites, based on reuse alternatives identified through community outreach. The Analysis of Brownfields Cleanup Alternatives (ABCA) will identify potentially applicable remediation alternatives for the site. The project team will compare potential land uses with the environmental impacts associated with properties and steps required to redevelop the property. The level of remedial action can then determine how to best meet community needs. In the first quarter, we will begin the development of an overarching area-wide revitalization plan for the ABC Community. This overarching plan will build upon the City's Consolidated Plan, Bicycle and Pedestrian Connectivity Plan, and the Neighborhood Revitalization Implementation Plan. The area-wide plan will consider findings from the environmental assessments, and incorporate community input. We anticipate completing the plan by the fourth quarter. Additionally, we will create individual redevelopment concepts for the specific brownfields sites, infrastructure evaluations to investigate the roadways needed to reconnect the neighborhood street grid, and complete market studies for potential reuses as needed and appropriate.

b. Cost Estimates and Outputs

The following cost estimates and anticipated outputs are based on discussions with consulting firms specializing in brownfield projects and on our previous brownfield grant experience.

Budget Categories	Tasks (Hazardous)					Tasks (Petroleum)				
	Project Mgmt	Comm Outreach	Site Assessments	Cleanup & Redev	Total $	Project Mgmt	Comm Outreach	Site Assessments	Cleanup & Redev	Total $
Personnel										
Fringe										
Travel	4,000				4,000	2,000				2,000
Equipment										
Supplies		1,000			1,000		500			500
Contractual	6,000	11,000	147,000	31,000	195,000	3,000	4,500	72,000	18,000	97,500
Total	**10,000**	**12,000**	**160,500**	**17,500**	**200,000**	**5,000**	**5,000**	**76,500**	**3,000**	**100,000**

Task 1 – Project Management & Reporting		**Amount (Hazardous)**	**Amount (Petroleum)**
Category	**Description (Outputs)**		
Travel*	Conferences/workshops during project	$4,000	$2,000
Contractual**	Monthly Project Management Meetings (Qty 36)	$6,000	$3,000
Total		**$10,000**	**$5,000**

*Two attendees at National BF Conference ($4000), SE BF Conference ($1000), and another related conference ($1000)
**2 hrs/month x 36 months x $125/hr
In-kind services estimated to be $12,960 (12 hrs/month x 36 months x $30/hr)

Task 2 – Community Outreach		**Quantity**	**Unit Cost**	**Amount (Hazardous)**	**Amount (Petroleum)**
Category	**Description (Outputs)**				
Supplies	*Community presentation materials (design/printing)*	*6*	*$250*	*$1,000*	*$500*
Contractual	Community Involvement Plan	1	$3,000	$2,000	$1,000
	Information Repository	1	$500	$300	$200
	Project Webpage and Updates	1	$2,500	$2,000	$500
	Project Information Sheets, Brochures, Articles	5	$500	$2,000	$500
	Brownfields Task Meetings	12	$400	$3,200	$1,600
	Public Meetings	2	$600	$800	$400
	Meetings with property owners and/or developers	4	$250	$700	$300
Contractual	*Subtotal*			*$11,000*	*$4,500*
Total				**$12,000**	**$5,000**

Task 3 – Site Assessments (Outputs)	**Hazardous**			**Petroleum**		
	Quantity	**Unit Cost**	**Total Cost**	**Quantity**	**Unit Cost**	**Total Cost**
Phase I ESA	3	$3,000	$9,000	3	$3,000	$9,000
Asbestos Survey	3	$2,000	$6,000	n/a	n/a	n/a
Generic QAPP	0.5	$3,000	$1,500	0.5	$3,000	$1,500
SSQAPP	3	$4,500	$13,500	3	$2,000	$6,000
Phase II ESA (Mill sites)	2	$45,000	$90,000	2	$20,000	$40,000
Other Phase II ESA	1	$27,000	$27,000	1	$15,500	$15,500
Total Costs			**$147,000**			**$72,000**

Cost of HSP is included in Phase II cost (approximately $1,000 each).Phase II ESAs for mill sites are expected to be more than other Phase II ESAs due to size and complexity, as well as split funded due to anticipated distinct petroleum plumes.

Task 4 – Cleanup & Redevelopment Planning	**Hazardous**			**Petroleum**		
	Quantity	**Unit Cost**	**Total**	**Quantity**	**Unit Cost**	**Total**
ABCAs	2	$3,000	$6,000	1	3,000	$3,000
Area-wide Plan	.67	$30,000	$20,000	.33	$30,000	$10,000
Site-specific Plans	1	$5,000	$5,000	1	$5,000	$5,000
Total			**$31,000**			**$18,000**

c. Measuring Environmental Results

The Brownfields Task Force will meet quarterly to track progress. The City will hold monthly conference calls with the Project Team (the EPA Project Officer and SCDHEC Project Manager will be invited to join) to track progress and take corrective actions, if needed, to ensure the project remains on budget and schedule. The City will submit quarterly reports and will enter information in ACRES database. At a minimum, outputs to be tracked include the number of task force meetings, public meetings, environmental assessments, ABCAs; and, the outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure: The City has the organization and project team in place to support a successful project. Maurice McKenzie, Planning and Development Director, will serve as Project Manager. He has been with the City since 1993, holds a BA in Geography from UNC Greensboro and Master of City and Regional Planning from Clemson University, and is certified with American Institute of Certified Planners. Margot Martin, Finance Director, will serve as Project Assistant. She has been with the City since 2000, holds a BA in Accounting from Winthrop University, and is a Certified Public Account/Certified Government Financial Officer. Terance Roberts, Mayor, will serve as Project Chief Executive. He was elected Mayor in 2006 and is now serving his 4th term in that position.

ii. Acquiring Additional Resources: To assist with technical aspects of the project, the City has selected a QEP consultant experienced in brownfields assessment and redevelopment in accordance with the Code of Federal Regulations and local competitive procurement policies and will negotiate a contract after notification of grant award. Systems are in place to replace key staff and procure additional contractor services as needed. Mr. McKenzie will coordinate with the consultant to ensure all requirements are met within the three-year duration of the project.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: In 1999, the City received a $200,000 grant under the EPA Brownfields Assessment Pilot program (#BP984860-99-0). The City successfully performed all phases of work in compliance with the grant agreement and expectations of the program. In 2000, the City of Anderson received a $100,000 USTFields grant. While grant funds were managed by SCDHEC, the City played a significant role in project implementation, particularly with community outreach, site identification, and coordination with property owners.

(1) Accomplishments: Outputs included: inventory of 32 brownfield sites; assessment of 3 sites; 2 Phase I, 3 Phase II, and 2 Phase III ESAs; and execution of 1 VCC. The community outreach program was very successful, with residents taking initiative to pressure absent property owners to clean up properties and start a neighborhood watch. Six former service stations were inventoried and assessed. The City acquired one of the UST properties, removed 5 tanks, and redeveloped the site for parking to serve downtown economic growth. Five additional tanks were removed, assisting redevelopment of a privately owned property. Outputs/outcomes were accurately reported to the EPA Project Officer.

(2) Compliance with Grant Requirements: The City received the EPA Brownfield grant funds November 1999 and closed out the project in June 2004. The City was compliant with the terms and conditions of the grant. In consultation with EPA/SCDHEC, some modifications were made to the workplan and schedule. The project experienced some delays, due to issues gaining access to properties, contractor staff turnover and backlog at the state level review of ESA reports. The City maintained close communications with the EPA Project Manager and was granted schedule extensions. The City submitted all quarterly reports with performance and financial updates on a timely basis. At time of closure, $350 of funds was left unexpended, as no additional assessment task could be performed for that amount. There was no ACRES database at the time; property profile forms were provided to the EPA Project Officer.

THRESHOLD CRITERIA for ASSESSMENT GRANTS

1. Applicant Eligibility

The City of Anderson, South Carolina, is a general-purpose unit of local government as defined under 2 CFR 200.64.

2. Community Involvement

The City will build of upon its existing strong neighborhood outreach program already established within the target Redevelopment Area by asking representatives from each of the neighborhood groups (specifically the Alphabet Streets Community) to serve on the Brownfields Task Force. The Task Force will meet quarterly to: guide site selection activities, ensure project alignment with community interests and needs, promote the project to property owners/potential investors, and communicate project updates. The City will host at least two public meetings to present project updates, solicit feedback, and invite community participation, and meet with community groups as needed. In the redevelopment planning stages of specific properties, the City will conduct workshops and/or visioning sessions. Public meetings and other significant events will be advertised in the Anderson Independent Mail, Anderson Observer, and the City's website. With a large elderly and poor population, easily accessible, low-tech communication methods will be most effective. So, in addition to website updates and presentations to City Council, the City will employ church bulletins, newspaper press releases, local radio announcements, brochures/flyers, and presentations to neighborhood groups to communicate progress.

3. Expenditure of Grant Funds

The City of Anderson does not have an active EPA Brownfields Assessment Grant.

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☒ Preapplication	☒ New	
☐ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
01/30/2019	

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 Anderson, South Carolina

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
[redacted]	0737228940000

d. Address:

* Street1:	401 South Main Street
Street2:	
* City:	Anderson
County/Parish:	Anderson
* State:	SC: South Carolina
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	296240000

e. Organizational Unit:

Department Name:	Division Name:

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

Prefix:	Mr.	* First Name:	Maurice
Middle Name:			
* Last Name:	McKenzie		
Suffix:			

Title: Planning and Development Director

Organizational Affiliation:

* Telephone Number:	(864) 231-2222	Fax Number:	

* Email: mmckenzie@cityofandersonsc.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-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT 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 Anderson Community Wide Brownfield Assessment Project

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 SC-03 * b. Program/Project SC-03

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2019 * b. End Date: 09/30/2022

18. Estimated Funding ($):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 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: Mr. * First Name: Terence

Middle Name:

* Last Name: Roberts

Suffix:

* Title: Mayor

* Telephone Number: (864) 231-2200 Fax Number:

* Email: troberts@cityofandersonsc.com

* Signature of Authorized Representative: Maurice L McKenzie * Date Signed: 01/30/2019