



PROPOSAL FOR USEPA'S BROWNFIELD CLEANUP GRANT
RFP NO. EPA-I-OLEM-OBLR-23-15 CFDA NO. 66.818
Section IV.D. – Narrative Information Sheet
November 13, 2023

1. Applicant Identification

Town of Louisburg, North Carolina
110 W. Nash Street
Louisburg, North Carolina 27549

2. Funding Requested

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

3. Location:

Town of Louisburg, Franklin County, North Carolina

4. Property Information:

32 West River Road, Louisburg, NC, 27549

Census Tract / Town / County / State

Census Tract 37069060302, Louisburg, Franklin County, North Carolina

5. Contacts

a. Project Director / AOR

Sean Medlin, Town Administrator
110 W. Nash Street, Louisburg, North Carolina 27549-2526
(919) 496-3406
SMedlin@townoflouisburg.org

b. Chief Executive/Highest Ranking Elected Official

Christopher Neal, Mayor
110 W. Nash Street, Louisburg, North Carolina 27549-2526
(919) 497-1005
mayorneal@townoflouisburg.org

6. Population

US Census Bureau, 2020 Decennial Census:
Town of Louisburg: 3,064

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The proposed site(s) is in a federally designated flood plain.	1
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

8. Releasing Copies of Applications: N/A

TOWN OF LOUISBURG, NC
PROPOSAL FOR USEPA'S BROWNFIELDS CLEANUP GRANT
Section IV.E – Narrative Proposal / Evaluation Criteria
November 13, 2023

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Unless noted, references are latest publicly available and reflect the most current information.

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The Town of Louisburg (Town), founded in 1779, is the county seat of Franklin County (FC), in a historically rural, agricultural area in north-central, North Carolina (NC). The Tar River bisects the Town and essentially creates two communities, one north of the river and one south of the river. White professionals built grand homes north of the Tar, while cotton and tobacco warehouses and their related seed companies sprung up on the south for proximity to the original freight depot. Minority residents and businesses were mostly concentrated in this half of Town, that at one time included thriving cafes, churches, grocers, and a historic Rosenwald School. Once thriving agriculture and traditional manufacturing facilities have all but disappeared as economic drivers for Louisburg. What remains are blighted empty buildings, vacant lots and deteriorating structures with a potential toxic history.

The decline in agriculture and traditional manufacturing in this region has resulted in the loss of jobs, decreased property values and declining tax revenue for the Town, placing a greater burden on citizens with limited resources to revive their community. Several major Louisburg employers have closed since the 1990's, resulting in the loss of over 1,000 jobs and an outmigration of the population seeking jobs. As noted in the following sections, the latest available Census estimates for 2021 reflect the Town of Louisburg and its neighborhoods concentrated south of the Tar River (Census Tract 603.02) have been particularly hard-hit correlating to their **White House Justice40 disadvantaged community** status.

Louisburg is a 2021 USEPA Brownfields Assessment Grant awardee whose active grant target area focus is known as The River Corridor, which includes a portion of South Main Street and a nearby flood mitigation area to its west. This area mirrors Louisburg's decline and is dotted with vestiges of Louisburg's past economies, including cotton gins, tobacco warehouses, auto dealerships, service stations and repair shops, and dry cleaners. **The cleanup grant project property (Site) detailed throughout this narrative proposal is located within this corridor (Census Tract 603.02).** Potential funding under this grant will help to remove blight along the Main Street Corridor and bring beneficial reuse to a Site whose current conditions include dilapidated, vacant warehouses and an unpermitted waste disposal area within the Tar River floodplain.

1.a.ii. Description of the Priority Brownfield Site: The Louisburg parcel proposed for a targeted cleanup is approximately 4-acres total and is owned by the Town of Louisburg. The parcel is positioned just south of downtown and adjacent to an active, yet historical, Franklin County School listed on the National Historic Register and the Town's Riverbend Park. The parcel is bordered to the north by the Tar River and to the south by West River Road. Two vacant warehouses reside on the parcel fronting West River Road with addresses of 32 and 44 West River Road. The former agricultural warehouses are estimated to be approximately 5,500 and 4,500 square feet in size and date to the 1940s. The buildings are one-story wood construction with metal siding and roofing. **An area of the parcel approximately 1.6-acres in size has been impacted by former use as an unpermitted waste disposal area. The area of impact lies between the warehouses and the adjacent Tar River, in a forested, FEMA flood zoned area and is the proposed Site of the planned cleanup activities presented under this grant application.**

A Phase I Environmental Site Assessment (ESA) was completed in July of 2022 and followed by a Phase II ESA completed in October of 2023, both funded under the Town's current USEPA Brownfields Assessment Grant. Recognized Environmental Conditions (RECs) were identified within the Phase I ESA to include the observation of a large quantity of surficial and partially buried wastes. Observed wastes contain typical construction and demolition debris (shingles, carpeting, brick, concrete, pvc-piping, tires, etc.) and irregularly cover the Site.

The area of observed wastes was the focus of the October 2023 Phase II ESA and is the focus of this brownfields cleanup grant application. Soil and groundwater samples were analyzed for the following Target Analyte List (TAL) Contaminants of Concern (COCs): Volatile Organic Compounds (VOCs), semi-volatile organic compounds/purgeable aromatic hydrocarbons (SVOCs/PAHs), PCBs (soil only), total inorganics including total mercury, Pesticides, and Herbicides.

Soil analytical results revealed several inorganic COCs in all borings sampled, including one analyte (arsenic) in all samples at concentrations above the residential soil Regional Screening Level (RSL). The observed arsenic concentrations are consistent with naturally occurring, regional arsenic concentrations (USGS, 1984). All other TAL inorganics were detected at concentrations below their respective residential and industrial/commercial soil RSLs. The lab detected eight (8) TAL VOCs in at least one sample; however, no TAL VOCs were detected at concentrations greater than their respective residential or industrial/commercial soil RSLs. Select VOCs were detected primarily in surficial soil samples. Fourteen (14) SVOCs were detected in at least one sample. However, only one (1) (benzo(e)pyrene) was detected at a concentration greater than the respective residential or industrial/commercial soil RSLs. No TAL PCBs, pesticides or herbicides were detected at concentrations greater than the residential or industrial/commercial soil RSLs. In groundwater, no TAL inorganics, VOCs, or SVOCs were detected in the samples at concentrations greater than the USEPA MCLs for drinking water. These results may indicate the Site is not an immediate danger to health, however, the wastes present at the Site are a source of blight for the surrounding disadvantaged community and a monetary roadblock for reuse/redevelopment and revitalization of the site.

1.b Revitalization of the Target Area 1.b.i. Reuse Strategy and Alignment with Revitalization Plans: A private investor has approached the Town with plans to renovate and preserve the two warehouses, transforming one of them into a large rental event space and the other a split of three retail spaces envisioned as a salon, **water recreation rentals tied to the adjacent Tar River**, and community support/food sales. In the flood zone area of waste disposal (cleanup Site) is envisioned residential short-term rental units raised above the flood elevation **complete with beautification and provision of a river access point**. This **proposed end use ties directly to the Louisburg 2030 Comprehensive Plan (CP), adopted April 2022**, which serves as the Town's guide for revitalization. The Plan establishes goals, objectives, and actionable steps. The 2030 CP was directed by a Steering Committee that was comprised of community members, including those residing within the disadvantaged target area, and leaders with various backgrounds. This Committee met at key points during the project to discuss the background information, review public survey results (269 respondents), develop a vision, and provide input on the direction of the overall plan.

The 2030 CP's overarching goals include creating a successful, vibrant Downtown/River Corridor. From the 2030 CP ***"The Tar River runs through the heart of Louisburg. However, it is difficult to appreciate the river given the steep topography and extensive vegetation along the river's banks."*** Space for private vendors to create outdoor adventure-related businesses on both sides of the river, **including kayak and canoe rental**, is specifically encouraged in the Plan. ***"This type of private enterprise can help provide improvements around the river, drawing visitors to Downtown Louisburg."*** Additional strategies from the 2030 CP linked to this potential project include expanding tourism opportunities and maintaining a business-friendly atmosphere for potential investors.

1.b.ii. Outcomes and Benefits of Reuse Strategy: Beyond the undeniable environmental benefits, outcomes of this project include improved drainage in a flood prone riverine area, increased recreation and tourism opportunities, additional tax revenue, quality of life improvements, removal of blight in a disadvantaged community, and increased community pride. This grant will provide great support remediating environmental risks and is the critical next step to move the proposed cleanup Site closer towards redevelopment into new, healthier and economically vibrant businesses and outdoor recreational facilities that will promote physical activity, improved aesthetics, address exposure to health hazards, increase property values, and strengthen community bonds, all of which help rectify environmental injustices in an underserved community. The proposed new businesses will provide much

needed jobs to a community experiencing almost 30% unemployment. By leaning into the untapped natural beauty of the Tar River for recreational tourism, as emphasized in the 2030 CP, the Town anticipates ancillary spending at existing restaurants, gas stations, and other small community owned businesses within this Justice40 disadvantaged community.

Planning efforts funded under this grant provide an opportunity for Louisburg to focus on climate resiliency by incorporating climate friendly best management practices (BMPs) into brownfield Site reuse concepts. This includes methods to reduce total energy use and increase the percentage of energy from renewable resources; reduce air pollutants and greenhouse gas emissions; reduce water use and preserve water quality; conserve material resources and reduce waste; and protect land and ecosystems such as the Tar River. The Cleanup Site will particularly benefit from climate focused redevelopment planning since it lies within a designated flood prone area. By prioritizing BMPs, Low Impact Development, and Green Infrastructure for stormwater management into site reuse plans, Louisburg will build and strengthen community flooding resiliency to the effects of climate change and provide equitable development to its disadvantaged communities.

1.c Strategy for Leveraging Resources 1.c.i. Resources Needed for Site Characterization: The Town has previously committed nearly \$30,000 for the cost of the Phase I ESA, Phase II ESA, and the Analysis of Brownfield Cleanup Activities through the use of their USEPA Brownfields Assessment Grant funds. In addition, Louisburg has previously invested on costs associated with the site's redevelopment including acquisition and maintenance. The Town's estimated Total Budget for the site cleanup is \$500,000 (see Section 3). The Town is committed to additional investment into the site's redevelopment in the future, as it becomes needed. Should additional assessment be required, the Town may again tap into any remaining funds in their assessment grant. Given the size and extent of currently identified contamination at the site, significant resources required for additional assessment are not anticipated. If the Town's USEPA Brownfields Assessment Grant funds become unavailable, additional sources of assistance will be sought which may include the Golden LEAF Foundation (tobacco indemnification) funds, which can be a transformative tool for revitalization and economic development in the region. The NC Brownfields Program also offers 5-year tax credits, which can be used to offset cleanup costs as well as liability protections, and allows for risk-based cleanup, which can be less costly for a developer. The Community Development Block Grant Program provides flexible funding to facilitate community revitalization, economic development, and improved community facilities. Louisburg will maximize EPA grant funds by seeking additional resources available for assessment, cleanup, and reuse of priority brownfield sites from any available resources.

1.c.ii. Resources Needed for Site Remediation: **The amount of USEPA funding requested in this application, \$500,000 is estimated to be sufficient to complete the remediation of the proposed brownfield site without need for additional resources.**

1.c.iii. Resources Needed for Site Reuse: As noted above, Louisburg has negotiated with a private developer to acquire the Site post-remediation for reuse/redevelopment. The planned redevelopment concept is for the entire parcel footprint, which includes the existing warehouse spaces to be saved and remodeled with future additions of short-term bed-and-breakfast rental units planned within the cleanup Site footprint to provide support for the new businesses that will occupy the warehouses. The developer will use private funds to complete the proposed reuse project and is currently seeking bids for the warehouse renovations. The developer has already expended approximately \$170,000 of private funds toward the project through completing preliminary redevelopment planning and earmarked funds for future property purchase of the Site. Once cleanup and property transfer are complete, the developer expects to invest **\$1.5 million** to bring the concept to fruition. Additionally, Louisburg has identified the need to make their Town more resilient during flooding and other natural disasters. To that end, the Town identified several large debris blockages along the Tar River contributing to increased flooding of the

cleanup Site. In 2022, the Town successfully secured over \$250,000 in funding to remove existing blockages and dead vegetation thereby minimizing future flooding.

1.c.iv. Use of Existing Infrastructure: The utilization of existing utility connections (water, sewer, gas, electricity, and telecommunications) and roadways were used as important prioritization criteria when evaluating the Site for a cleanup grant application and redevelopment potential. The cleanup Site is positioned along a primary roadway with existing utility connections or immediate access thereto. Sufficient utility capacity is currently available for the project anticipated for the Site, but the Town will facilitate upgrades if needed for a specific site reuse. Planning is complete for stormwater infrastructure improvements for flood mitigation in the River Corridor, including this site on West River Road, and will be implemented in the near future.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a Community Need

2.a.i. The Community’s Need for Funding: Under the Justice40 Initiative, Census Tract 603.02 encompassing the target area for this grant, is designated as both a Justice40 (CEJST) disadvantaged community and an EPA IRA Disadvantaged Community. The cleanup project target area is overwhelmingly disadvantaged with Median Household Income (MHI) estimated at only \$23,169, correlating to 38% of NC’s MHI and 37% of the surrounding County MHI. The Town’s **small population (<3,000)** does not have the tax base for dedicated funding for brownfield site remediation except through these USEPA brownfields cleanup grants. **Louisburg’s unemployment and poverty rates are more than 3 times that of the County.** Town resources are stretched thin in maintaining basic services, addressing current community issues, and funding future critical developments. The economic and demographic conditions in Louisburg, particularly in the target area, clearly demonstrate the need for funding.

Criteria	Census Tract 603.02	Town of Louisburg	Franklin County	North Carolina
Population:	2,253	2,952	67,598	10,367,022
Poverty Rate (All Persons):	25.3%	36.0%	11.3%	13.7%
Unemployment Rate:	15.7%	29.5%	6.5%	5.3%
Percent Minority:	66.4%	63.0%	34.1%	33.8%
Median Household Income (MHI):	\$46,364	\$23,169	\$62,332	\$60,516
Female Householder, No Spouse, w/Child:	19.5%	15.9%	6.4%	5.6%
Requiring Food Assistance:	30.9%	35.6%	15.5%	12.1%
Less than High School Education:	19.8%	17.8%	13.5%	11.0%

Data from: <https://data.census.gov>, American Community Survey, ACSDP5Y2021, Tables DP02, DP03, DP04, and DP05.

2.a.ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: For a Town the size of Louisburg, specific health information for cancer, birth defects, and asthma are not available separately from County health data. Given the compact footprint of the Town, many sensitive residents live close to brownfield sites. Residents in Louisburg, particularly in Census Tract 603.02, are likely to be at even higher risk of chronic health conditions. Louisburg has a high percentage of minority citizens (66.4%), and suffers from very high poverty rates (36%). **Census Tract 603.02 is designated as both a Justice40 (CEJST) disadvantaged community and an EPA IRA Disadvantaged Community.** EPA’s EJScreen Community Report (EECR) for Census Tract 603.02 indicates **nearly half (48%) of residents are low-income earners. More than a third of target area residents are living below the poverty line with an equal number requiring food assistance; more than double the County and State rates.** Data suggests that environmental injustice and social conditions play a role in the determination of health among these sensitive populations. The EECR confirms the target area contains high percentiles (>80) of inhalation health hazards to include particulate matter, air toxics cancer risk, and air toxics respiratory hazards. These demographic populations lack the resources to protect against exposure risks to environmental contaminants from their neighborhood brownfields such as the cleanup site proposed within this

application. The disadvantaged elderly and children living in Census Tract 603.02 south of the Tar have the fewest resources to improve their situations. Remediation and reuse of the cleanup Site present in their midst will have a direct positive impact on the reduction of elevated toxic air pollutants affecting their health and welfare.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: As noted above, **for a Town the size of Louisburg, specific health information for cancer, birth defects, and asthma are not available separately from County health data.** However, the EECR for Census Tract 603.02 reports **the cleanup project area contains high percentiles (>80) of inhalation health hazards** including particulate matter, air toxics cancer risk, and air toxics respiratory hazards. These high air quality environmental risk values directly relate to Census Tract 603.02's ranking in the **93rd percentile for asthma** when compared to NC. When compared to US health indicator percentiles, **Census Tract 603.02 scores high for persons with disabilities (82ndile), heart disease (96thile), and low life expectancy (75thile).** CDC published cancer rates for the County are on par with State occurrence rates at 455.6 occurrences per 100,000. Regarding birth defects, the CDC National Environmental Public Health Tracking Network identifies Franklin County within **the highest tier of birth defects (hypospadias) in the State** for 2015-2019. Given that many structures with associated environmental risks are concentrated in and around the target area, it can be inferred that these areas would have a higher prevalence of health issues.

The cleanup site and other brownfields in the area can directly contribute to these health problems, due to their former and some current activities producing contaminants that are proven to cause asthma, cancer, birth defects and various systemic health problems. The plans for converting the cleanup Site into a productive and clean new business with outdoor recreational areas resolves these health issues in two ways. First, in the process of site redevelopment, the source of airborne particulates that exacerbate asthma or heavy metals that contribute to cancer and birth defects will be removed or mitigated, which decreases exposure and subsequent adverse health conditions. Second, the outdoor areas will promote physical activity, promote taxbase and economic growth through jobs arising from the new businesses at the cleanup site and surrounding support businesses, replace eyesores with aesthetically pleasing landscapes, and achieve the target area communities' desires as noted in their planning documents, which will improve physical and mental health.

(3) Environmental Justice: (a) Identification of Environmental Justice Issues: As previously noted, **Census Tract 603.02 is designated as both a Justice40 (CEJST) disadvantaged community and an EPA IRA Disadvantaged Community** with a high percentage of minority citizens (66.4%). When drilled down to the block group level of the cleanup site (603.02-1), these numbers increase to **73% minority citizens and a 56% low-income population** making it one of the most environmentally disadvantaged areas in the State. The CDC EJ Dashboard ranks Census Tract 603.02 with a score of 0.88 signifying that **88% of tracts in the nation likely experience less severe cumulative impacts from environmental injustice than the target area.** The CDC created the Social Vulnerability Index, identifying how vulnerable a community may be to human suffering and financial loss, including environmental issues such as chemical spills or natural disasters, as well as disease outbreaks. Census Tract 603.02 ranks within the highest category for all four of the social vulnerability indices within Franklin County which includes housing and transportation, socioeconomic status, household characteristics, and minority status.

The greater than normal incidences of disease and adverse health conditions outlined above point to a severely underserved community with a long history of environmental injustice. Former and current brownfield facilities can contribute to these environmental risks, including the proposed cleanup Site and the surrounding former commercial/industrial sites within the Town's priority corridor. In 2017, Town staff first began seeking input from the disadvantaged community during the USEPA Brownfield Assessment Grant application process. The first step was soliciting participation through public meetings and the Downtown Economic Development Committee (DEDC), made up of community members of varying backgrounds, to provide education about brownfields and to hear the community's voices regarding their personal struggles related to environmental injustice.

(b) Advancing Environmental Justice: Louisburg is actively correcting these identified environmental injustices with the help of their current EPA Brownfields Assessment Grant and active brownfields program. The program acknowledges the need for environmental assessments and community engagement as part of the process for redeveloping targeted priority sites and improving conditions within the underserved community. This project will specifically address some of these environmental challenges by removing cancer-causing and asthma-inducing constituents from existing debris piles and exposed contaminated soils, which can easily become airborne or be carried by storm water runoff from the site. The potential reuse plan sees the vacant warehouse spaces renovated into retail/event spaces. In addition, the cleanup Site footprint will feature short-term residential rental units focusing on support of the new businesses and increasing Tar River recreational tourism. The cleanup Site has not been historically owned or operated by members of the underserved community. The event space and recreational access to the river is a community service currently missing within the target area and therefore will not be competing with current businesses or cause displacement of residents.

2.b. Community Engagement

2.b.i / 2.b.ii Project Involvement and Project Roles: The DEDC serves as Louisburg’s Brownfields Redevelopment Advisory Group. Initially, the group at its regular monthly meetings helped to identify and prioritize the principal sites within the Brownfields Target Area under the Town’s 2021 USEPA Brownfields Assessment Grant. The current group although reconstituted from its initial membership, continues in its responsibilities for providing direction to the project. They include, but not are limited to, the following representatives and affiliate roles:

Partner Name	Point of Contact	Specific Role in Project
Town of Louisburg Local Government Representative	Chris Neal Email: cneal@townoflouisburg.org Phone: 919-496-4145	Participate as a Project Leader and Grantee Representative
Micheal Liter Home Design Local Contractor	Micheal Liter, Owner [REDACTED]	Private developer who intends to purchase the cleanup Site for reuse. Will provide updates on reuse planning and schedules.
South Main Baptist Church	Fannie Perry Email: Tperry001@nc.rr.com Phone: 919-496-2464	Will assist with the Public Outreach and Community Engagement portions of the project.
Louisburg College Higher Education Representative	Dr. Gary Brown, President Email: gmbrown@louisburg.edu Phone: 919-497-3226	Provide students with an opportunity to learn about brownfields and Environmental Careers. Provide meeting space.
Franklin County Government	Colton Young, Senior Planner Email: cyoung@franklincountync.gov Phone: 919-496-2909	Technical assistance with community development needs and support for job creation.

2.b.iii. Incorporating Community Input: Since 2016, the Town has worked with citizens and community leaders to develop the vision and plans for redeveloping brownfields in Town. The DEDC has solicited input from the larger community, especially those residents on the Southside and River Corridor. This was accomplished through a planning process that resulted in the adoption of the Town’s 2030 Comprehensive Plan, the Town’s Local Economic Development Plan, and the South Main Street Revitalization Community Development Plan. Additionally, the Town created a Community Involvement Plan under its 2021 USEPA Brownfields Assessment Grant which will continue to guide public participation in these cleanup activities. The DEDC will meet bi-annually to assist Town staff with cleanup/reuse planning. Town staff will update citizens of brownfield activities through the Town’s website, newspaper feature articles, Council meetings and other special called meetings with neighborhood groups. The DEDC will use the adopted planning documents mentioned as the guiding tool for implementation and site redevelopment. Outreach efforts will be made to locally affected neighborhoods as projects are undertaken to ensure community

participation in development decisions. Partners such as the South Main Street Church will act as a liaison for the South Main Street corridor neighborhoods for communication and dissemination of information as it functions as a key gathering space for area residents. The project team will carefully consider and respond to any community concerns in a timely manner. The public will be made aware of the meetings through a combination of notices in newspapers and posts on social media and websites. Virtual meetings may be used for inclusion of groups who may not be able to attend in person or for pandemic precautions.

As required by the grant guidelines, notification was given to Town residents regarding the intent to submit the cleanup grant as well as an update on current activities associated with the ongoing assessment grant. An overview of how the brownfields program and potential benefits to the community were discussed, along with the environmental impacts and planned redevelopment of the West River Road Site.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The proposed cleanup plan will involve excavation and removal of surficial and subsurface debris, surrounding and underlying soil, transport of the material to a construction and demolition landfill, regrading of the site for drainage, and site stabilization. This selected alternative will allow the site to be construction-ready. This remedy was selected because it accomplishes the remediation of the hazardous substances in the most cost-effective manner and will reduce human exposure to onsite contamination (including potential ACMs, contaminated soil) by eliminating the exposure pathways. The cleanup project associated with this selected alternative will cost an estimated \$500,000. This estimate of project cost was derived from an engineering cost estimate based on the results of previous assessments of the site and current costs with similar remediation projects. This remedy includes the design services related to site remediation, implementation of soil and debris management practices, and relocating impacted media. This remedy meets regulatory criteria.

Site assessments identified localized, limited soil contamination amid a former debris disposal area estimating 5,200 cubic yards (CY) and an estimated 4,800 CY of construction/demolition debris in several piles on the site. Due to the nature of the identified soil contaminants and the hazards presented by the construction debris materials in their current exposed state, removal of the debris piles potentially comingled with hazardous materials (e.g., asbestos-containing materials (ACMs)) and remediation of contaminated soils are needed to ensure the site is safe for its future intended reuse.

In October 2023, a draft Analysis of Brownfields Cleanup Alternatives (ABCA) was prepared to address the cleanup/abatement of the areas of environmental concern at the proposed cleanup site. The ABCA recommended the following actions: 1) excavation and proper disposal of contaminated soils at an offsite landfill and backfill areas with clean soil; and 2) proper removal and disposal of construction/demolition debris at a permitted offsite facility. Appropriate notifications will be made prior to and during the process. If ACMs are suspected in the debris during removal, the materials will be placed in distinct, manageable stockpiles that will be sampled to confirm the presence of ACM. Materials that do not contain ACM will be disposed of at the Construction and Demolition (C&D) landfill. Materials that do contain ACM will be disposed of at Subtitle D landfill. Asbestos abatement in the state of North Carolina is overseen by the North Carolina Department of Health and Human Services (NCDHHS) Division of Public Health. Additionally, this work will be performed in accordance with OSHA asbestos regulations 29 CFR 1910 & 1926 and the National Emission Standards for Hazardous Air Pollutants (NESHAP) asbestos regulations 40 CFR 61, subpart M.

Our Qualified Environmental Professional (QEP) will complete the required plans and assist with oversight and monitoring of cleanup and (if necessary) abatement contractors. After project kickoff, the QEP will

finalize the ABCA, complete an Asbestos Abatement Plan (to be used as necessary), and draft a Quality Assurance Project Plan (QAPP), which will include the plans for the soil and debris removal, ACM management (if identified), air monitoring and confirmation sampling, and submit to NCDEQ and EPA for approval. The Town will then competitively procure excavation and abatement contractors, and our QEP will coordinate air monitoring during abatement activities, as necessary. At the conclusion of soil excavation, debris removal, and ACM abatement, our QEP will collect confirmation samples to ensure all potentially impacted soils have been properly removed. The QEP will submit all documentation to NCDEQ and EPA to certify the completion of the site cleanup activities.

3.b. Description of Tasks/Activities and Outputs (Sections 3.b.i.-iv. outlined under each task)

Task/Activity 1: Project Management/Reporting
<u>i. Project Implementation:</u> The Town will be responsible for overseeing and managing the grant activities, including completion of all quarterly and annual performance reporting; updating property-specific information in ACRES; and completing the final closeout report. The Town’s Project Director will be supported by the QEP and Town staff. Travel funds have been budgeted to attend meetings, workshops, and conferences that are sponsored by the EPA and/or NCDEQ.
<u>ii. Anticipated Project Schedule:</u> Oct. 1, 2024, to Sep. 30, 2026; negotiate QEP contract in December 2024.
<u>iii. Task/Activity Lead(s):</u> Town of Louisburg Project Director
<u>iv. Output(s):</u> 8 Quarterly Reports, 2 MBE/ WBE reports, 3 Federal Financial Reports (FFRs), 1 Final Cleanup and Grant Closeout Report
Task/Activity 2: Community Involvement
<u>i. Project Implementation:</u> Community outreach has been and will continue to be vital to the success of the Town’s efforts. A Community Involvement Plan (CIP) is in place from ongoing USEPA Assessment Grant. Steering Committee meetings will be held quarterly, and at least two public meetings will be held to update the community. Funds are budgeted to purchase supplies and for contractual support.
<u>ii. Anticipated Project Schedule:</u> October 1, 2024, to September 30, 2026 with key public meetings in March 2025 (prior to cleanup start), and Dec. 2026 (after cleanup). Steering Committee meetings will be held quarterly beginning in 1st quarter 2025.
<u>iii. Task/Activity Lead(s):</u> Town of Louisburg & QEP
<u>iv. Output(s):</u> 8 Steering Committee Meetings, 2 Community Meetings, 2 Articles
Task/Activity 3: Cleanup Planning/Observation/Remedial Action Report
<u>i. Project Implementation:</u> This task includes the outputs of finalizing the ABCA, QAPP, finalizing Land Use Restrictions (as required), Soil Management and Health & Safety Plans. This task also includes observation and documentation of remedial action and preparing the Remedial Action Report.
<u>ii. Anticipated Project Schedule:</u> October 1, 2024 to June 30, 2025; Final ABCA 1st Quarter 2025; QAPP and bid documents 2nd Quarter 2025
<u>iii. Task/Activity Lead(s):</u> QEP with Town of Louisburg Project Director Oversight
<u>iv. Output(s):</u> 1 ABCA, 1 QAPP, 1 ACM Abatement Design, 1 H&S Plan, 1-3 Sets of Bid Documents
Task/Activity 4: Cleanup Activities
<u>i. Project Implementation:</u> Consistent with the draft ABCA, this task includes anticipated contractor costs for removal and offsite relocation of contaminated materials. This task also includes a final cleanup/project report and regulatory coordination regarding technical aspects of the project with

TDEC and EPA throughout the cleanup effort. The Cleanup Activities will be overseen by the QEP, with the Town of Louisburg assisting.
ii. Anticipated Project Schedule: Subcontractor Procurement May 2025, Cleanup Activities beginning Jul 2025, Certificate of Completion by Jun 2026.
iii. Task/Activity Lead(s): QEP with Town of Louisburg Project Director Oversight
iv. Output(s): CY of material and soil removed, 1 Certificate of Completion

3.c. Cost Estimates

The *Project Budget Table* below provides direct costs of the defined tasks and cost types.

Budget Categories	Task 1. Project Management	Task 2. Community Involvement	Task 3. Cleanup Planning	Task 4. Cleanup Activities	Total
Personnel (In-Kind Excluded from Budget)	\$0	\$0	\$0	\$0	\$0
Travel ¹	\$5,000	\$0	\$0	\$0	\$5,000
Supplies	\$0	\$700 ²	\$0	\$0	\$700
Contractual	\$9,000 ³	\$4,800 ⁴	\$33,000 ⁵	\$447,500 ⁶	\$494,300
Indirect Costs	\$0	\$0	\$0	\$0	\$0
EPA Total (Direct Costs)	\$14,000	\$5,500	\$33,000	\$447,500	\$500,000
Total Project Cost	\$14,000	\$5,500	\$33,000	\$447,500	\$500,000

USEPA Federal Funding Details

¹ Town Grant Manager and Mayor travel expenses for attendance at one BF conference: \$5,000 (no labor, only conf. fee, travel/expenses)

² Supplies for public outreach: \$700

³ QEP to assist with project management/reporting: \$150/hr x 60 hrs. = \$9,000

⁴ QEP to assist with community involvement/meetings: \$150/hr x 32 hrs. = \$4,800

⁵ QEP to assist with cleanup planning, and reporting: \$150/hr x 220 hrs. = \$33,000

⁶ QEP and contractor for cleanup actions: QEP oversight (\$125/hr x 160 hrs. = \$20,000) + lab analysis/waste characterization (25 samples x \$200/sample=\$5,000) + excavate/haul/dispose of waste at landfills (\$422,500)

3.d. Plan to Measure and Evaluate Environmental Progress and Results:

To maintain steady progress throughout the grant period, the QEP will prepare **monthly reports to the Town** in compliance with the approved **EPA Cooperative Agreement Work Plan**, which will summarize activities, (e.g., milestones achieved, issues encountered, and budget/schedule updates). These will be used to gauge progress, communicate with constituents and prepare quarterly performance reports. Updates will be reported upon implementation and completion of each site-related task in **EPA’s ACRES database**, and Louisburg will provide ongoing (quarterly, at a minimum) and post-grant information describing outcomes and benefits of the funding, including additional funds leveraged, jobs created, acres made ready for redevelopment, and private investment and tax revenue generated as a result of the program. Anticipated outcomes from the cleanup include alignment of EPA funding objectives with redevelopment; reduction or elimination of future contaminant exposure; removal of blight; and the return of site to productive use that creates jobs for the local Proposed Target Site community and improves economic conditions. These outcomes align well with EPA strategic plan objectives.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

4.a.i. / 4.a.ii. Organizational Structure and Description of Key Staff: The table provides the future brownfields program’s organizational structure and describes key staff experience and qualifications. Given

their education and professional experience, including their current position with the Town and experience with the Town's USEPA Brownfields Assessment Grant, the key staff fulfill roles that provide the technical, administrative, and financial capacity to provide oversight, management, and administration the grant. If additional staff or resources are required, the Town will seek in-house staff to fulfill the need.

<p>AUTHORIZED ORGANIZATIONAL REPRESENTATIVE (AOR) / FINANCE: Sean Medlin, Town Administrator Sean was appointed Finance Director in 2008 and later elevated to Town Administrator in November 2022. A native of Louisburg, he is a graduate of Louisburg College and NC Wesleyan College and currently in enrolled in the MBA Program at UNC Pembroke. He has over 20 years work experience and has led the Town' EPA Brownfield Assessment Grant Program for the last year. Sean is also temporarily the Acting Finance Director as of September 2023 due to a vacancy in the position of Finance Director until filled.</p>
<p>ADMINISTRATIVE/ ECONOMIC DEVELOPMENT/PLANNING: Philip Slayter, Special Projects Administrator Hired in June 2020, Philip is a seasoned urban planner with over 30 years' experience in local government planning and administration. He has graduate degrees in Public and Health Administration and maintains an AICP certification.</p>
<p>Technical: Keith Callahan, Planning & Zoning Administrator Keith was hired to replace Philip Slayter in July 2023 and has served as a County Planner and Building Official for three years. He formerly was CEO of a family- owned construction company and holds an undergraduate degree in mechanical engineering from NC A&T as well as numerous NC construction and building certifications. He will assist with the selection of qualified environmental consultants.</p>

4.a.iv. Acquiring Additional Resources: Louisburg will rely on a *Qualified Environmental Professional (QEP)* contractor with appropriate expertise and resources to carry out the technical aspects of its Brownfields Redevelopment Program. For *contractor selection and procurement*, Louisburg follows competitive negotiation procedures required for all public bodies in the state to obtain professional services at reasonable cost. All procurement procedures will be conducted in compliance with 40 CFR 31.36 and the NC public procurement procedures for Qualifications Based Selection (QBS). Beginning with advertisement of a request for qualifications and proposals for professional services, followed by interviews with top candidates if needed, staff will score applicants, select, and negotiate a contract with a qualified candidate. Applicable EPA solicitation clauses will be incorporated into Louisburg's solicitation and final contract executed with the selected contractor.

4.b.i Louisburg has Previously received an EPA Brownfields Grant: Louisburg received an EPA Community-Wide Brownfields Assessment grant award of \$300,000 in 2021.

(1) Accomplishments: Under its current 2021 EPA grant, the Town has completed five (5) Phase I ESAs, one (1) Phase II ESA, one (1) geophysical survey, one (1) redevelopment planning activity, and numerous workplans, all entered into ACRES. Two (2) additional Phase I ESAs are in progress along with a Phase II ESA that includes removal of multiple USTs at a former gas station under redevelopment as a community center.

(2) Compliance with Grant Requirements: The Town has demonstrated it is fully capable of successfully completing all work phases under the cooperative agreement. The Town is familiar with and understands the necessity of developing work plans, creating and maintaining schedules, and assuring adherence to project terms and conditions. All required documentation has been submitted in a timely manner and approved by USEPA. Final site packages were submitted through ACRES and approved for all program sites assessed. Under their current USEPA Grant, in their 4th quarterly reporting for FFY22, the Town reported a 37.6% draw down of their \$300K grant and has enough additional prioritized assessment and redevelopment projects ongoing or planned to see all grant funds expended by the period of performance date.

TOWN OF LOUISBURG, NORTH CAROLINA
PROPOSAL FOR USEPA'S BROWNFIELDS CLEANUP GRANT
RFP NO. EPA-I-OLEM-OBLR-23-15 / CFDA NO. 66.818
Section III.B. – Threshold Criteria
November 13, 2023

1. Applicant Eligibility: The Town of Louisburg, North Carolina, is a unit of local government as defined in 40 CFR Part 31.3, and therefore, is an eligible entity to receive an EPA Brownfields Cleanup grant.

2. Previously awarded Cleanup Grants: The Town of Louisburg has never received an EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds: The Town of Louisburg has never received an EPA Brownfields Multipurpose Grant.

4. Site Ownership: The Town acquired ownership of the West River Road site on August 30, 2019 (deed attached).

5. Basic Site Information:

- a) Name of the site: West River Road Site
- b) Address of the site: 32, 44, and 56 West River Road, Louisburg, NC 27549
- c) Current owner of the site: Town of Louisburg, NC

6. Status and History of Contamination at the Site:

a) Type of Contamination: Hazardous substances

b) Operational History and Current Use: The Site currently lies unused and is heavily wooded but was historically used as a cotton gin and warehouse space for tobacco and cotton. There are currently two former structures currently situated on the southern portion of the subject property that were formerly used as warehouses. Approximately 80% of the site is undeveloped (vegetated with grass, brush, or trees).

The subject property's first documented, developed use, as depicted in the 1914 fire insurance map (FIM), shows a large pile of cotton stored directly on the ground on the eastern portion of the site and two dwellings along the southwest property line. Aerial images appear to show the dwellings removed in the 1970s. A 1930 FIM documents a large tobacco warehouse in the location of the former cotton pile. The tobacco warehouse extends off the subject property to South Main Street, east of the subject property.

Aerial images indicate the tobacco warehouse was removed in the early 1960s. First developed use of adjacent property to the southeast appears to be a cotton gin as shown on the 1908 through 1939 FIMs. Due to the hand drawn nature of the FIMs and apparent realignment of West River Road (formerly an unpaved road known as Cripple

Creek) it is unknown if some of the former cotton gin facilities noted on the FIM were positioned on the subject property or adjacent. A single gas tank is depicted in the 1939 FIM on the edge of the subject property boundary associated with the cotton gin. Aerial images indicate the cotton gin was removed in the 1950s.

A 1950 aerial image depicts three new warehouse buildings on the subject property, two of which remain. This third building was removed from the subject property in approximately 2015.

The Site has reportedly been vacant since approximately 2005.

c) Environmental concerns:

Draper Aden Associates, ((DAA)now TRC Engineers, Inc. (TRC)) conducted a Phase I Environmental Site Assessment of the site in July 2022, and noted the following Recognized Environmental Conditions (RECs) in the Phase I ESA report (July 2022):

- 1 Due to the low level of spatial detail provided in the 1930/1939 FIMs and the apparent shifting of Cripple Creek Road to become West River Road, it is uncertain if the engine room and gas tank associated with a historical cotton gin (~1910s to 1950s) was located on the subject property or on adjacent property. The likely impact from this source to the subject property could not be eliminated. Based on length of time in operation, there is potential for impact to the subject property primarily attributed to historical operations and potential for likely undocumented releases of hazardous substances and/or petroleum products.
- 2 A large quantity of surficial wastes was observed in the wooded area north and northwest of the warehouse buildings extending all the way to the riverbank as identified on Figure 2. Wastes observed included large concrete slabs, brick, block, asphalt, shingles, plumbing, glass, metals, and over 100 tires. Soil covered mounds in this area indicate potential for buried wastes. Additionally, similar scattered wastes were observed on the ground surface beneath the two warehouse buildings within the foundations.
- 3 From approximately 1910s to the 1960s the eastern portion of the subject property stored or processed tobacco and/or cotton commodities. This historical use lends potential for leaching and accumulation of hazardous herbicides and pesticides on the subject property.

d) How Site Became Contaminated, Nature and Extent of Contamination:

The Site became contaminated from historical use. At some point in the Site's history (est. 1970s-1980s based on aerial imagery), the area between the existing warehouses and the Tar River was used for construction and demolition waste land disposal.

In August 2023 TRC conducted Phase II site assessment activities to obtain and evaluate environmental data deemed representative of site conditions. More specifically, the

scope of this study included site soil and groundwater assessment in the context of the RECs identified in the Phase I ESA. The results were used to determine whether chemical constituent concentrations in soil and groundwater were greater than commercial/industrial risk-based screening levels, and to determine the potential for vapor intrusion at the site, and the need for additional assessment or remedial action and/or exposure controls.

Ten soil borings, two of which were converted to groundwater monitoring wells, were advanced in the observed surficial and subsurface waste materials disposal area. Soil samples were collected in depth ranges from 0-2 feet below ground surface (bgs) and 2-8 feet bgs and groundwater samples were collected from a depth range of 2-12 feet bgs and analyzed in accordance with EPA and state-approved procedures for the following Target Analyte List (TAL) Contaminants of Concern (COCs):

- Volatile Organic Compounds (VOCs);
- semi-volatile organic compounds/purgeable aromatic hydrocarbons (SVOCs/PAHs);
- PCBs (soil only);
- total inorganics/including total mercury;
- Pesticides;
- Herbicides.

Soil analytical results revealed several inorganic COCs in all borings sampled, including one analyte (arsenic) in all samples at concentrations ranging from 1.35 mg/kg to 7.1 mg/kg (depths ranging from 0 to 10 feet-bgs). Noticeably, samples collected at depth intervals between 0-2 foot-bgs had comparably higher arsenic concentrations than those collected at more than 2 foot-bgs. The arsenic concentrations detected are less than the USEPA commercial/ industrial soil regional screening level (RSL) of 3 mg/kg, but above the residential soil RSL of 0.68 mg/kg. The observed arsenic concentrations are consistent with naturally occurring, regional arsenic concentrations (USGS, 1984). All other TAL inorganics were detected at concentrations below their respective residential and industrial/commercial soil RSLs.

The lab detected eight (8) TAL VOCs in at least one sample; however, no TAL VOCs were detected at concentrations greater than their respective residential or industrial/commercial soil RSLs. Select VOCs were detected primarily in surficial soil samples. Methyl acetate was reported in all soil samples, xylenes were reported in four samples, toluene was reported in three samples, and Isopropyl benzene, methyl cyclohexane, methylene chloride, styrene and trichloromethane were reported in one sample. Some contaminant detections were reported to be considered influenced by laboratory contamination.

Fourteen (14) SVOCs were detected in at least one sample however, only one (1) (benzo(e)pyrene) was detected at a concentration greater than the respective residential or industrial/commercial soil RSLs.

No TAL PCBs, pesticides or herbicides were detected at concentrations greater than the residential or industrial/commercial RSLs.

In groundwater, no TAL inorganics, VOCs, or SVOCs were detected in the samples at concentrations greater than the USEPA MCLs for drinking water.

7. Brownfields Site Definition: The site is not listed or proposed for listing on the National Priorities List; 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 is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications: DAA/TRC conducted a Phase I Environmental Site Assessment of the site in July and an ASTM E1903-19 compliant Phase II environmental site assessment of the site in August 2023. The Phase II ESA consisted of the advancement of ten soil borings and installation of two groundwater monitoring wells within the area of surficial waste disposal in the wooded area north and northwest of the warehouse buildings and the collection of soil and groundwater samples. The objective of the Phase II ESA was to determine whether chemical constituent concentrations in soil and groundwater were greater than commercial/industrial risk-based screening levels, and to determine the potential for vapor intrusion at the site, and the need for additional assessment or remedial action and/or exposure controls. The Phase II Assessment Report was prepared and submitted to EPA in November 2023.

9. Site Characterization:

The Town of Louisburg has not entered into a Brownfields Agreement with the North Carolina Department of Environmental Quality and has made a determination of ineligibility for enrollment in the Inactive Hazardous Sites Branch (IHSB)'s Recognized Environmental Consultant (REC) Program. However, remediation of the site may be conducted pursuant to the guidance for expedited completion of mildly contaminated properties under the Inactive Hazardous Sites Response Act (IHSRA), which is primarily suited for sites with only soil contamination.

Pursuant to the assessment guidelines promulgated under IHSRA's expedited closure completion policy, which include documentation demonstrating that assessment of contamination in all media is complete, unrestricted use standards and protection of groundwater standards have been met, and verification that soil contaminants detected during previous assessments are attributed to background levels, no additional assessment is needed to sufficiently characterize the site(s) for establishment of the rationale for No Further Action.

A current letter from the NC DEQ is attached that explains why the site is eligible for closure under the REC Program or under a BFA but may be eligible for closure under the IHSRA' s Expedited Closure Completion Policy. The letter confirms that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions: There are no ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is requested. There also are no inquiries or orders for federal, state, or local government entities that we are aware of regarding the responsibility of any party (including the Town) for the hazardous substances at the site, or any liens.

11. Sites Requiring a Property-Specific Determination: This site does not require a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

a. Property Ownership Eligibility – Hazardous Substance Sites: The Town of Louisburg acquired sole ownership of the property from Ford Enterprises, Inc. on August 30, 2019 by donation (see attached warranty deed). The property is eligible for brownfield cleanup grant funding based on the following affirmations:

1. The property is not listed or proposed for listing on the National Priorities List.
2. The property 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.
3. The property is not subject to the jurisdiction, custody, or control of the US government.
4. The property is not subject to a planned or ongoing CERCLA removal action.
5. The property is not the subject of a unilateral administrative order, court order, an administrative order on consent or judicial consent decree that has been issued to or entered into by the parties, or been issued a permit by the U.S. or an authorized state under the Solid Waste Disposal Act (as amended by the Resource Conservation and Recovery Act (RCRA)), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SWDA).
6. The property is not subject to corrective action orders under RCRA (sections 3004(u) or 3008(h)).
7. The property is not a land disposal unit that has submitted a RCRA closure notification under subtitle C of RCRA and is not subject to closure requirements specified in a closure plan or permit.
8. The property has not had a release of polychlorinated biphenyls (PCBs) that is subject to remediation under TSCA.
9. The property has not received funding for remediation from North Carolina's Leaking Underground Storage Tank (LUST) Trust Fund.
10. All disposal of hazardous substances at the property occurred before the applicant acquired the property.

11. The applicant did not cause or contribute to any release of hazardous substances at the property.
12. The applicant did not arrange for the disposal of hazardous substances or transport of hazardous substances to the property.
13. The applicant is not potentially liable at the property as an Operator, Arranger, or Transporter.
14. The applicant is not affiliated with the previous property owner (familial, contractual, and financial).

The Town of Louisburg also asserts Bona Fide Prospective Purchaser (BFPP) Liability Protection and demonstrates compliance with the following requirements:

- The applicant conducted a Phase I ESA All Appropriate Inquiry investigation in compliance with ASTM E1527-13. The report was completed by TRC Engineers for the Town of Louisburg, dated July 27, 2022. The report noted that the property was acquired on August 30, 2019, from Ford Enterprises, Inc. The Town acquired the site through involuntary acquisition and did not cause or contribute to the contamination. The applicant is a unit of local government who acquired the site through abandonment. The Town's USEPA Assessment Grant Project Manager made a site eligibility determination on June 23, 2023 (attached).
- The Town is not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination.
- All disposal of hazardous substances at the site occurred before the Town acquired the site.
- The Town has and will exercise appropriate care by taking reasonable steps to address releases, including stopping releases and preventing threatened future releases and exposures to hazardous substances on the site. There are no known releases at the Site.
- The Town will comply with any land use restrictions and will not impede the effectiveness or integrity of any institutional controls associated with response actions at the site.
- The Town will provide full cooperation, assistance, and access to authorized persons.
- The Town will comply with any CERCLA information requests and administrative subpoenas, and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.
- The Town will not impede performance of a response action or natural resource restoration.
- The Town will provide all legally required notices.

13. Cleanup Authority and Oversight Structure:

a. Describe how the Town will oversee the cleanup at the site(s).

The Town plans to conduct the site remediation pursuant to the guidelines of the IHSRA's Expedited Closure Completion Policy to obtain formal regulatory approval, expedite document reviews, and obtain transferrable liability protection. A draft ABCA that presented three cleanup alternatives to address the impacted soils at the site was developed, and the final report will consist of a site assessment verification that the remedial objectives were met. The recommended alternative, based on the findings from the Phase II ESA, includes excavation and landfill disposal of shallow soils impacted by arsenic, VOCs and SVOCs followed by clean backfill placement. Cleanup will also include the removal of construction, demolition, and other debris encountered during the excavation; and segregation, confirmation sampling, and proper disposal of ACM, if detected. The Town has significant experience with retaining technical expertise to assist with complex projects and will retain a qualified Environmental Professional firm to develop a corrective action plan and cleanup the site. The Town will ensure that all procurement actions are undertaken in accordance with municipal, state and federal laws and ordinances, including the competitive procurement provisions of 2 CFR 200.317 through 200.326. The recommended cleanup will consist of the following:

Contaminant-Impacted Soils Remediation and Debris Removal:

- Verification of eligibility under IHSRA's Expedited Closure Completion Policy.
- Preparation of bid documents for the proposed excavation and solicitation of bids from qualified contractors.
- Excavation and landfill disposal of an estimated 7,200 tons of soil from the area of the identified debris disposal
- Potential on-site re-use of soil if analytical results comply with applicable re-use standards
- Waste characterization of excavated soil using the Toxicity Characteristic Leaching Procedure (TCLP). Based on these results, non-hazardous soil will be segregated from hazardous soil (if identified) to determine landfill disposal or on-site reuse options.
- Collection of confirmation samples from the base and sidewalls of the excavated areas.
- Based on characterization (hazardous or non-hazardous), transportation of the soil to the appropriate landfill for disposal.
- Excavation of an estimated 9,600 tons of construction, demolition, and other solid waste materials from the area of the identified debris disposal
- Segregation and characterization of the excavated materials for disposal determination. (e.g., potential ACMs (insulation, roofing materials)). Based on these results, non-ACM C&D materials will be transported to a C&D landfill, identified ACMs will be properly abated and disposed at an approved landfill, and other, non-regulated solid waste will be transported to a municipal solid waste landfill.
- Preparation of a final report and placement of restrictive covenants (if required).

Demolition Debris Containing ACMs: The on-site debris disposal area has not been assessed for the presence of ACMs debris. If suspected ACMs (e.g., pipe insulation, floor tiles, roofing materials) are discovered during excavation activities the materials will be placed in distinct, manageable stockpiles that will be sampled to confirm the presence of ACMs. Materials that do not contain ACM will be disposed of at the Construction and Demolition (C&D) or municipal solid waste landfill. Materials that do contain ACM will be disposed of at a Subtitle D landfill as required by North Carolina Department of Health and Human Services. This approach has been approved by NC DHHS and the EPA on several other EPA funded cleanup grants at former industrial building demolition waste sites in the state, so regulatory approval should not be an issue. For cost estimating purposes and as presented in the draft ABCA, a total of 4,800 cubic yards/9,600 tons of debris are estimated to be excavated, with 20% of the debris containing ACM and thus requiring special handling/landfill disposal procedures.

b. Cleanup response activities: The Town already owns the property and access to other properties will not be required. However, an additional community meeting will be held prior to conducting excavation activities to inform area residents of the remediation activities and to address any concerns that may be raised.

14. Community Notification:

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): A copy of the draft grant application, along with a draft ABCA was provided for review at the first community meeting on October 27, 2023. Instructions on where the documents could be reviewed and how to comment prior to submittal of the grant proposal were provided.

b. Community Notification Ad: The Town provided public notification advertising the Town's intent to apply for this cleanup grant, and for the community meeting scheduled for October 27, 2023. Several methods of community notification were employed for this grant application, including:

- Community meeting notification placed in the local newspaper, the Franklin Times.

c. Public Meeting: The latest public meeting to discuss the cleanup grant proposal was held at the Louisburg Town Hall on October 27, 2023 at 6:00 pm. A copy of the draft grant application and the draft ABCA was presented, along with instructions on where the documents can be reviewed and how to comment prior to submittal of the proposal. The meeting was open to all, with no pre-registration. No one from the public attended the meeting and no comments were received by the Town of Louisburg during the 14-day comment period in which the draft application and draft ABCA were made available for review at the Town Hall.

d. Submission of Community Notification Documents: Proof of the advertisement for the community meeting, proof of attendance (sign in sheet), and a copy of the draft ABCA are attached.

15. Contractors and Named Subrecipients:

Not Applicable. No consultants or subcontractors have been named as subrecipients of this grant.



NORTH CAROLINA
Environmental Quality

November 9, 2023

ROY COOPER

Governor

ELIZABETH S. BISER

Secretary

MICHAEL SCOTT

Director

Sent via email: smedlin@townoflouisburg.org

Sean Medlin, Administrator
Town of Louisburg
110 W. Nash Street
Louisburg, NC 27549

Re: U.S. EPA Brownfields Cleanup Grant
West River Road Site
Franklin County, North Carolina
Non-permitted

Dear Mr. Medlin,

The North Carolina Brownfields Remediation Section (NC BRS) acknowledges that the Town of Louisburg, plans to conduct the cleanup of a brownfield site and is applying for an FY24 EPA Brownfields Cleanup Grant.

The Town of Louisburg has developed an application requesting site-specific federal Brownfields Cleanup funding for the West River Road Site at 32, 44, and 56 West River Road. The commercial property in question was acquired by the Town in 2019 and is located along the Tar River. Information provided to the Solid Waste Section indicate instances of non-permitted/indiscriminate dumping of construction and demolition debris, scrap tires and other non-hazardous solid waste in an area approximately 1.6 acres in size by parties unknown. All indications are that disposal occurred prior to the Town's acquisition of the property.

The NC BRS affirms that the West River Road Site:

- i. Is eligible to be enrolled in the NC BRS voluntary response program, pending submittal and detailed review of an application in accordance with our statutory obligations;
- ii. Is not currently enrolled in the NC BRS voluntary response program but can be voluntarily managed under the Solid Waste Section oversight in addition to or separate from the NCBRS voluntary response program.
- iii. Per information provided to the NC BRS and Solid Waste Section (the current regulating entity for the removal of this waste), there is a sufficient level of site characterization from the environmental site assessments performed to date for remediation work to begin.



North Carolina Department of Environmental Quality | Division of Waste Management
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646
919.707.8200

We hope the Town is successful in this venture, and please let us know if we can provide technical assistance with determining final disposal or recycling options. Amanda Thompson, Environmental Sr. Specialist is your Solid Waste Section contact and can be reached at 910-433-3352 or amanda.thompson@deq.nc.gov. Your NC BRS contact is Joselyn Harriger, who can be reached at 980-297-4623 or joselyn.harriger@deq.nc.gov.

Sincerely,

A handwritten signature in blue ink that reads "Joselyn Harriger". The signature is written in a cursive style with a large, looping initial "J".

Joselyn Harriger, PG
Grant Coordinator
Brownfields Redevelopment Section

cc: Amanda Thompson, Solid Waste Section
Philip Slayter, Town of Louisburg
Ryan Sadler, TRC Companies