



**US EPA FY24 Brownfield Cleanup Grant
Rome Floyd County Development Authority—Rome, GA
Narrative Information Sheet**

1. Applicant Identification

Rome Floyd County Development Authority
800 Broad Street, Suite 102
Rome, GA 30161

2. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$2,000,000

3. Location

- a. City of Rome
- b. Floyd County
- c. Georgia

4. Property Information

Former Battey State Hospital
705 North Division Street
Rome, GA 30165

5. Contacts

- a. Project Director
Missy Kendrick, President/CEO
Rome Floyd County Development Authority
800 Broad Street, Suite 102
Rome, GA 30161
Office: 706-413-4213
missykendrick@developromefloyd.com
- b. Chief Executive/Highest Ranking Elected Official
Missy Kendrick, President/CEO
Rome Floyd County Development Authority
800 Broad Street, Suite 102
Rome, GA 30161
Office: 706-413-4213
missykendrick@developromefloyd.com

6. Population

City of Rome 37,913 (US Census V2022)

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7. Other Factors

Other Factors Information	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed 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.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	2
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2
The target area(s) is located within a community in which a coal-fired powerplant has recently closed (2013 or later) or is closing.	5

8. Releasing Copies of Applications

No portions of the application are considered confidential, privileged, or sensitive. It is understood that the application may be made available to the public by EPA.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The City of Rome, GA (population 37,913) is the largest city in Floyd County and located 70 miles northwest of Atlanta and 75 miles due south of Chattanooga, TN. Like its namesake, Rome is situated on seven hills at the confluence of three rivers: the Oostanaula, the Etowah, and the Coosa. These waterways made the city a significant transportation and market hub from the time of its founding in 1835. Rail connection to the Western and Atlantic Railroad in 1851 opened the Tennessee and Ohio valleys to Rome and other rail lines followed, connecting Rome to critical transportation centers in Alabama, Tennessee, and Atlanta. This expansive rail network supported a diverse industrial economy bolstered by local iron works, the timber industry, the cotton trade and textiles. Local iron production led to at least five firms producing stoves in Rome, making it the stove center of the South. The Civil War, major flooding events, the Boll Weevil, the Great Depression, WWII, and more recently the COVID 19 pandemic all negatively impacted Rome's economy. Today, despite its diminished agricultural and manufacturing base, Rome serves as a center for education, healthcare and technology for its rural region.

The historic manufacturing area of North Rome and its surrounding community is the Target Area of this proposed project. North Rome is home to four federally-designated Justice40 disadvantaged communities with a population of 17,751 (47% of city residents) and includes the historic African American Five Points business district and Blossom Hill neighborhood. Like many cities after WWII, legacy industries in North Rome experienced a sharp decline leaving area residents with a lack of jobs, blight, and environmental concerns on former industrial sites. The Rome Floyd County Development Authority (RFCDA) serves as the lead economic development organization for the City of Rome and Floyd County and works to revitalize these former industrial areas to reignite the local economy and replace lost jobs. However, these efforts have been impeded by the COVID 19 pandemic, which hit Floyd County's manufacturing sector hard with a 24% loss of jobs, primarily in textile mills and rubber products manufacturing.¹

ii. Description of the Proposed Brownfield Site

Within this larger area targeted for revitalization is the brownfield site that is the focus of this application; key to the redevelopment strategy for RFCDA to create new economic activity and jobs for the North Rome community impacted by a large brownfield in its midst. The subject property is 110 acres of the original 132.5-acre former hospital campus located in North Rome that had been in decline for several decades and vacant since 2011. The Former Battey State Hospital property was initially developed in the early 1940s as a temporary hospital primarily serving tuberculosis patients. The site was transferred to the state of Georgia in 1946, with a continued focus on tuberculosis treatment, and subsequently expanded. Areas of the property were redeveloped in the early 1970s to facilitate treatment of both tuberculosis and mental health patients. Records reported that in 1977, the hospital was averaging 281 patients a day with a staff of 605 professionals, with 260 beds reserved for mental health patients and approximately 50 beds for tuberculosis patients. Reportedly, the inpatient tuberculosis unit was phased out in the 1990s and the facility began solely treating patients with mental health and disability conditions. The hospital closed due to a lack of funding and rising maintenance costs associated with the aging facility. With its closing, the community lost 700 jobs, as well as housing and services for a vulnerable population.²

¹ NW GA Regional Commission Econ. Impact Report, 8/2021

² Northwest Georgia News, 2013

During the more than 70 years of operation as a large hospital campus, a variety of hazardous materials were used and managed for various operational activities including the campus motor pool, maintenance shops, a former incinerator, heating tanks and bio-hazard storage. Shuttered for over 13 years, the campus includes a total of 57 vacant structures in various stages of deterioration - several found to be associated with high levels of lead in soil exceeding soil cleanup criteria as well as substantial amounts of lead-based paint (LBP) and asbestos containing materials (ACM), creating a blighting influence on the surrounding community and a potential threat for community exposure.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

In 2015, the City of Rome and the RFCDA commissioned a redevelopment plan for the hospital site that included a site assessment, stakeholder input, community visioning sessions and a concept plan. The identified priorities in the *Northwest Georgia Regional Hospital Redevelopment Plan* were job creation, increase in tax base, opportunities for businesses, and civic amenities. The planning team considered multiple development options and concluded that the best reuse was conversion of the abandoned medical campus into a business park. The 2015 redevelopment plan was subsequently incorporated into the County/City 2018 *Comprehensive Plan 2040*. Reuse plans align with the Northwest Georgia Regional Commission's 2017-2022 Regional Comprehensive Economic Development Strategy, and its Essential Infrastructure goal of the need to, "Ensure northwest Georgia has sufficient, ready to develop industrial properties available to meet the region's current and future needs."

Consistent with the inclusive community vision, the city rezoned the site for industrial use. The current plan is to demolish most of the buildings on the remaining 110 acres to make way for new construction and transform the site to a Class A Business Park: the Battey Business Complex. Buildings that will not be demolished and separated from the industrial use by buffers are Building 405 (slated for redevelopment as a daycare center), 319 (a former chapel to be redeveloped as space for community groups, recreation and social services needed by the local residents and future workers), and 102 (a pavilion).

ii. Outcomes and Benefits of Reuse Strategy

The 2015 redevelopment plan for the site included an analysis of regional data to quantify the outcomes/benefits of redeveloping the Battey complex for commercial/industrial reuse, which include:

- Alleviating the hazards of a large, abandoned brownfield within a disadvantaged community, including exposure to contaminants and unsafe buildings;
- Over \$15 million in public investment is expected to leverage \$85 to \$100 million in new investment on the site;
- Increased tax base as an expected \$1.2 to \$1.4 million in annual property taxes would be generated for the City of Rome, the County, and Rome schools;
- Replacing jobs lost over the past decades and accelerated by the pandemic. From 2,100 to 2,900 permanent jobs with a potential payroll of \$88 to \$121 million are projected for the redevelopment;
- Incentivize use of green energy and climate resilience adaptations by prioritizing developers with plans to use green building standards and minimization of impervious surfaces; and

- Providing opportunities for open space that will improve the quality of life for the surrounding community by including a trail extension at the complex to tie into the Redmond and Berry Hill Trails.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Characterization; ii. Resources Needed for Site Remediation; and iii. Resources Needed for Site Reuse

The RFCDA has previously received an EPA Assessment grant in the amount of \$500,000, \$400,000 of which was used to conduct an ACM /LBP survey for the complex; a Phase II assessment that has fully delineated the lead contamination in soil; and the preparation of the targeted site’s two ABCAs. The State regulatory agency providing oversight, the GA Environmental Protection Division (GAEPD), requires additional assessment activities for groundwater which can be performed with the balance of the EPA Assessment grant funds. The remediation costs for the site total an estimated \$5.5 million. In addition to the EPA grant of \$2 million, a portion of a \$5.16 million HUD Congressionally Directed Spending grant will provide the balance of the cleanup funding. Transformation of the former medical complex into a state-of-the-art business park requires a substantial amount of front-loaded, public-sector investment, to include the completed acquisition (\$2.25M), demolition (\$2.76M) and common area improvements (\$5M). If awarded the EPA cleanup grant, RFCDA is able to successfully complete the project with no additional funding sources needed as summarized below. Leveraged funding documentation is Attached.

Name of Resource	Resource Reference	Secured or Unsecured	Additional Details or Information about the Resource
US EPA Assessment Grant	i	Secured	\$500,000: assessment/ remediation planning (2022)
County share of SPLOST (Special-purpose local-option sales tax)	iii	Secured	\$1.55M: \$1.125M site acquisition (expended) and \$430,000 towards demolition
City share of SPLOST (Special-purpose local-option sales tax)	iii	Secured	\$1.55M: \$1.125M site acquisition (expended) and \$426,170 towards demolition
2023 Congressionally directed funding via HUD CDBG	ii, iii	Secured	\$5.16M: partial remediation (\$3.5M) and demolition (\$1.66M)
Multiyear RFCDA annual operating budget contribution	iii	Unsecured	\$3,597,200: partial demolition (\$400,000) and Site development \$3,197,200)
2024 proceeds of sale of two properties (VT Industries and Lewis Chemical)	iii	Unsecured	\$1,802,800: Agreement of Sales executed for \$40,000/acre amounts to \$1,802,800. Sales slated for 2024.

iv. Use of Existing Infrastructure

Once remediation is completed, the site will be ready for redevelopment. The 2015 redevelopment plan concluded that the regional water, power, and sewer supplies already present were sufficient to serve the 110-acre site but would need retrofitting for industrial reuse. As described above, funding for such common area improvements is in place and will include construction of a new entrance; deactivation of a central boiler and chiller plant; realignment of roadways; and sewer enhancements supportive of the new use. Rail lines exist along the west/south boundary and could be retrofitted with rail spurs to provide a benefit for manufacturing or industrial uses. The site is

within 1000 FT from Route 1 and 1 mile from US Route 27, two major arteries providing easy transportation access in all four directions.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

A. Community Need

I. The Community Need for Funding

As a small rural city, Rome has a poverty rate of 24.7%, over double the rate in Georgia and the nation.³ Nearly half of the population in the target area is low income, placing it in the 97th percentile per the Climate Environmental Justice Screening Tool (CEJST). Underlying this economic reality are high rates of minority populations, households with limited English, and low education attainment. While the unemployment rate is lower than the national average, this only highlights that many are no longer counted or stuck in low paying jobs that result in families and individuals that are housing burdened, have a lack of health insurance and unable to afford a car.

Table 1: Demographics for Project Site and Target Area with Comparisons ⁴

	Bathey Site Census Tract 5	North Rome Disadvantaged Tracts 5,11,12 &13	Floyd County	GA	US
Population	3,749	17,751	98,210	10,625,615	329,725,481
Low Income	64%	49%	40%	34%	31%
People of Color	62%	59%	29.8%	48.6%	39%
Linguistic Isolation	16%	13%	4.1%	3%	5%
Families Below Poverty	28.9	21.8%	14.6%	10.3%	8.9%
Individuals with Disabilities	12%	16%	15.7%	12.3%	13%
Lack of health insurance	35.7%	23%	15.1%	13.1%	11%
Households without access to a car	19%	21.8%	8.8%	6.3%	8.3%
Less than HS Education	34%	29%	14.6%	16%	12%
Unemployment Rate	1%	3%	5%	6%	6%

The high degree of poverty in Rome creates a large demand for services that is not commensurate with the community’s available financial resources. Given the fiscal limitations of the local tax base and competing needs for basic services, the city is unable to address its brownfields without outside assistance and relies on federal and state funding sources for assessment and remediation. The RFCDA’s financial tools to facilitate economic development are limited to acquisitions and supporting private industry. Following acquisition and assessment of the site, additional funding is needed for the extensive remediation required for the safe demolition of the site’s 57 buildings. Thus, the ability to leverage HUD and other funding cobbled together with the EPA cleanup grant is the only avenue the community has to rehabilitate the old hospital site.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Floyd County is facing the double-edged sword of an aging population with a large cohort of minors, and not as many working-age adults to support these two vulnerable groups. According to CDC figures, three out of five residents are either under 18 or over 65. Pregnant women are also

³ US Census Quickfacts v2022

⁴ U.S. Department of Commerce. 2022. 5-Year Estimates: 2021 Census Bureau, American Community Survey Office, Washington, D.C., and Headwaters Economics’ Neighborhoods at Risk, headwaterseconomics.org/apps/neighborhoods-at-risk.

at risk. According to the 2022 Floyd County Community Health Indicator Report, the infant mortality rate is almost double at 12.1 per 1000 births versus 7.6 for the State and 6.5 nationally. For African American women, the rate triples with 21.3 deaths per 1000.⁵ Poverty among all groups in the target area is the biggest determinant of the health and welfare of the community. The health assessment documents that suicide is the 2nd leading cause of premature death in Floyd County and fatal drug overdoses are 48% higher than the state average. In fiscal year 2021, Floyd Medical Center provided \$50.4M in unreimbursed indigent and charity care to individuals who could not afford to pay.⁶

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

Adults living in Floyd County on average live 4 years less than their peers across the nation, the county has a 38% obesity rate, and higher rates of diabetes and kidney disease than average. The EPA EJScreen tool puts the Target Site community in the 94th percentile for lead paint risk in Georgia (87th in US). Lead is a highly toxic substance, identified in soils surrounding several buildings at the Battey Site as well as the presence of lead-based paint requiring abatement prior to demolition. Exposure causes health problems such as damage to the brain, kidneys, nerves, and blood. Data shows the community has higher rates of heart disease, asthma, lung cancer, and COPD which are exacerbated by poor air quality, including several generations impacted by a coal-fired power plant decommissioned in 2019. EJScreen indicates Census Tract 5 ranks in the 90-96th percentile for Particulate Matter, Diesel Particulate Matter, Air Toxic Cancer Risk, Air Toxic Respiratory Hazards and Toxic Releases to Air. These risks are higher for African Americans whose rates jump from 54 to 95 cases of lung cancer per 100,000. The County also experienced significantly higher COVID deaths with 584 per 100,000 versus 338 in the US and 388 in Georgia.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

EJScreen identifies several issues that further impact the population of North Rome beyond the demographics discussed above, including air-nonattainment, impaired waters, housing burdened, food dessert and a lack of transportation access. Over a dozen EPA regulated facilities for air pollution and chemical manufacturing are in the target area. Census tract 5 which includes the former hospital campus is located in a disadvantaged census tract per CEJST and illustrates the socio-economic challenges of the community, compared to others in the nation:⁷

- 97th percentile for low income
- 91st percentile for Linguistic Isolation (92% Spanish)
- 91st percentile for poverty
- 39% of adults with less than HS education (10% is benchmark)

(b) Advancing Environmental Justice

The remediation of the former hospital site would return the largest parcel of vacant land in North Rome to productive use and remove a growing blight and safety concern for the surrounding population. More significantly, for a community with high poverty and barriers of transportation access, language, and low education attainment, the Battey Business Complex will provide the opportunity for training and access to higher paying, good local jobs that can support a family.

⁵ <https://www.georgiaruralhealth.org/rural-health-information/health-indicators-report/>

⁶ CHNA Implementation Plan 2021, Atrium Health Floyd

⁷ <https://screeningtool.geoplatform.gov/en/#12.62/34.27623/-85.20412>

Furthermore, the vision to integrate public amenities in the complex will enliven an office park to offer civic space, social services and green spaces to the benefit of the community.

b. Community Engagement

i. Project Involvement and ii. Project Roles

Since the 2015 redevelopment planning process for the former hospital campus, the community has been engaged in the visioning and conceptual planning for the site. Over the past year, the RFCDA formed a brownfields project advisory team and launched a community relations plan to support the efforts of the current EPA assessment grant. The advisory group meets on a monthly basis and continues to provide feedback and input on the Battey Business Complex (BBC) remediation needs and assists in prioritizing options for its redevelopment. The diverse group includes key representatives of the community including:

Name of Organization	Point of contact Info	Specific involvement in the project or assistance provided
Georgia Power Community Development	Tamara Brock 706-477-7009 twbrock@southernco.com	Redevelopment Planning – economic impacts, business marketing needs and trends.
South Rome Alliance	Gary Waters 706-591-8339 gwaters@berry.edu	Provide insight and lessons learned from its community development efforts
North Rome Community Action Committee	Charles Love 706-290-3437 [REDACTED]	Neighborhood group based in the target area focused on improving quality of life for the community
Northwest Georgia Housing Authority	Sandra Hudson 706-378-3949 shudson@nwgha.com	Provide network to low income housing residents adjacent to the BBC site
Greater Rome Existing Industries Association	Nat Massey 706-291-7550 nat.massey@fandpgeorgia.com	Participate in public meetings and offer ongoing input from a manufacturer’s perspective
Rome Floyd County Library	Allison Robinson 706-236-4600 arobinson@shrls.org	Provide insight into youth and family needs in the target area
Greater Rome Board of Realtors	Susan Jones; 770-547-0197 susnjones@ttwrome.com	Assist in generating economic development demand for BBC; advising on property needs
Community Foundation of Greater Rome	Ashley Garner 706-728-3453 agarner@cffgr.org	Participate in public meetings; offer input regarding community needs
Rome Rotary	Chris Kerr [REDACTED]	Represent small/local businesses and community support
Georgia Northwestern Technical College	Heidi Popham 706-295-6927 hpopham@gntc.edu	Provide ongoing input on potential workforce development and training
Boys and Girls Club of Northwest Georgia	JR Davis 706-234-8591 jrdavis@bgcnwga.org	Provide insight into youth and family needs in the target area
Rome Floyd Chamber	Pam Powers-Smith 706-291-7663 psmith@romea.com	Represent local employers and engage their support
Rome Floyd County Community Kitchen	Lisa Stuenkel 706-622-7454 [REDACTED]	Represent needs of low income constituents in the target area and potential services to be expanded
Rome Floyd Recreation Authority	Todd Wofford 706-291-0766 Todd.wofford@floydcounty.org	Assist with planning park and recreation amenities and needs for youth and family services

iii. Incorporating Community Input

RFCDA also solicits community input at its public meetings, forums and community events. Project information is made available on the RFCDA website and social media platforms. Virtual meeting options developed during COVID-19 have been continued with RFCDA successfully garnering participation with an average attendance ranging from 10-12 attendees. Building on this success, the RFCDA plans a minimum of two public meetings per year in addition to the advisory team meetings to communicate information and to solicit additional input specific to the Battey Business Complex cleanup and reuse as the project unfolds. Meeting sites are selected with the transportation access challenges of many in North Rome in mind. Due to the high percentage (38%) of Hispanic residents of the target area, meetings, press releases, public notices and other media are provided in Spanish.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Of the initial 132.5 acres of the Battey Business Complex, two parcels are to be subdivided and sold. The remaining approximately 110-acre balance is the focus of this cleanup grant application. Based on the findings of the September 2023 Phase II ESA and the September 2023 Asbestos Containing Materials (ACM) and Lead Based Paint (LBP) Assessment Report, the environmental concerns that require remediation prior to redevelopment are: 1) the presence of ACM and LBP that must be abated prior to rehabilitation or demolition of the 24 vacant homes and 33 non-residential buildings (57 total) on-site; and 2) up to 10 inches of surface soil impacted by lead concentrations exhibited above the applicable state standard of 400 mg/kg surrounding the perimeters of only six of the buildings.

During the abatement process, anticipated to take 10 months, the ACM is to be abated via wet removal according to state regulations. For the LBP abatement, a registered Georgia Lead abatement contractor will perform the lead abatement activities. Appropriate work practices of ACM and lead dust, to include perimeter air monitoring, will be deployed to avoid contamination during abatement activities. Once the ACM and LBP abatement work has been completed, demolition activities will be conducted over the course of a year. After demolition activities have been completed, the soil remediation work will be conducted. Approximately 200 cubic yards of lead contaminated soil will be removed and properly disposed of off-site and the area regraded with existing clean soils. The remediation contractor(s) shall be responsible for the proper handling, transportation, and disposal of all waste in accordance with the state, federal and disposal facility requirements. A QEP will be procured to provide contractor oversight as well as to fulfill all GAEPD reporting requirements for the state Voluntary Remediation Program.

b. Description of Tasks/Activities and Outputs

Task 1: Program Management and Outreach
i. Project Implementation: EPA funded activities include a procured grant manager to perform grant budget tracking, reporting activities and a procured qualified environmental professional's (QEP) support for three community outreach meetings. Travel is for an RFCDA staff member to attend EPA brownfield conferences. Non-EPA funded activities include in-kind contributions in the form of procurement of contractors/consultants, programmatic oversight of the grant; regulatory liaison; and community outreach at an est. \$6,000.
ii. Anticipated Project Schedule: Duration of the Cooperative Agreement Performance Period
iii. Task/Activity Lead: RFCDA Project Director with support from QEP and project staff. Travel is for the RFCDA Project Director

iv. Outputs: Conferences attended; ACRES reporting; Quarterly, MBE/WBE, and Financial Reports; Community Meetings; Request for proposals issued; and grant closeout documentation.
Task 2: ACM/LBP Abatement
i. Project Implementation: EPA funded activities include a procured QEP providing oversight and management of the ACM/LBP remediation contractor, and QEP development of the Remedial Action Report. The QEP will develop an invitation to bid package, conduct third party monitoring and sampling, and coordinate with appropriate regulatory agencies to ensure proper reporting and fulfillment of regulatory program reporting requirements. Once an abatement contractor is procured, the contractor will perform the waste classification, secure permits, conduct the ACM/LBP abatement, and properly dispose of the waste material. Non-EPA funded activities include a portion of the ACM/LBP abatement activities using some of the HUD award.
ii. Anticipated Project Schedule: Year 1 to 2
iii. Task/Activity Lead: QEP and ACM/LBP Remediation Contractor who possess the requisite qualifications not contained in-house at RFCDA.
iv. Outputs: Invitations for Bid issued; QAPPs Prepared; Amount of ACM/LBP Abated and Disposed Off Site; Regulatory Reports submitted; and Temporary jobs created.
Task 3: Lead Soil Remediation
i. Project Implementation: EPA funded activities include a procured QEP providing oversight and management of the soil remediation contractor, and QEP development of the Remedial Action Workplan, the Soil Management Plan, and the Remedial Action Report. The QEP will develop an invitation to bid package, conduct third party monitoring and post ex-sampling, and coordinate with appropriate regulatory agencies to ensure fulfillment of regulatory program reporting requirements. Once a remediation contractor is procured after the completion of the demolition activities, the contractor will perform the waste classification, secure permits, conduct the soil excavation, transportation & disposal, and site regrading.
ii. Anticipated Project Schedule: Year 3 to 4
iii. Task/Activity Lead: QEP and Soil Remediation Contractor who possess the requisite qualifications not contained in-house at RFCDA.
iv. Outputs: QAPPs Prepared; Amount of contaminated soil material removed and disposed; Acres remediated; Regulatory Reports submitted; and Temporary jobs created

c. Cost Estimates

Budget Categories	Project Tasks			
	Task 1 Program Management & Outreach	Task 2 ACM/ LBP Abatement	Task 3 Soil Lead Remediation	Total
Personnel				\$0
Fringe Benefits				\$0
Travel	\$3,000			\$3,000
Supplies				\$0
Contractual	\$23,000	\$520,000	\$64,900	\$607,900
Construction		\$1,285,000	\$84,100	\$1,369,100
Other		\$15,000	\$5,000	\$20,000
Total Direct	\$26,000	\$1,820,000	\$154,000	\$2,000,000
Total Indirect	\$0	\$0	\$0	\$0
BUDGET TOTAL	\$26,000	\$1,820,000	\$154,000	\$2,000,000

**Rome Floyd County Development Authority (GA)
US EPA FY24 Brownfield Cleanup Grant Application**

The following provides a detailed breakdown of the cleanup costs:

Task ID	Task	Number	Units	Unit Costs	Units	Est Cost
1 Program Management and Outreach						
a	Contractual: Grant Management	4	Years	\$5,000	/year	\$ 20,000
b	Travel: EPA conferences	2	Conferences	\$1,500	/person/conf	\$ 3,000
c	Contractual: QEP for community outreach	3	meetings	\$1,000	/meeting	\$ 3,000
					Task sub-total	\$ 26,000
2 ACM / LBP Abatement						
a	Contractual: Develop Bid Specification for ACM/LBP	1	Lump Sum	\$20,000	Lump Sum	\$ 20,000
b	Contractual: Development of QAPP	1	Lump Sum	\$5,000	Lump Sum	\$ 5,000
c	Construction: Waste Classification	50	samples	\$300	Sample	\$ 15,000
d	Contractual: Development of HASP	1	Lump Sum	\$3,000	Lump Sum	\$ 3,000
e	Other: Permit fees	1	Lump Sum	\$15,000	Lump Sum	\$ 15,000
f	Contractual: QEP Contractor Oversight and Management	300	Days	\$1,500	Day	\$ 450,000
g	Construction: Mobilization / Demobilization	1	Lump Sum	\$35,000	Lump Sum	\$ 35,000
h	Construction: ACM/LBP Abatement: Residential Structures	1	Lump Sum	\$215,000	Lump Sum	\$ 215,000
i	Construction: ACM/LBP Abatement: Non-Residential Structures	1	Lump Sum	\$3,725,000	Lump Sum	\$ 3,725,000
j	Construction: Contingency (abatement contractor costs)	20	% of Items g, h, and i			\$ 795,000
k	Contractual: Perimeter Air Monitoring Equipment/Testing	300	Days	\$100	Day	\$ 30,000
l	Contractual: Reporting	1	Lump Sum	\$12,000	Lump Sum	\$ 12,000
					Task sub-total	\$ 5,320,000
3 Soil Lead Remediation						
a	Contractual: Site Survey	1	Lump Sum	\$12,000	Lump Sum	\$ 12,000
b	Contractual: Develop Soils Remedial Action Workplan	1	Lump Sum	\$2,500	Lump Sum	\$ 2,500
c	Contractual: Develop Bid Specification for Soil Remediation	1	Lump Sum	\$14,400	Lump Sum	\$ 14,400
d	Contractual: Development of Soil Management Plan	1	Lump Sum	\$6,000	Lump Sum	\$ 6,000
e	Other: Permit fees	1	Lump Sum	\$5,000	Lump Sum	\$ 5,000
f	Contractual: Development of HASP	1	Lump Sum	\$3,000	Lump Sum	\$ 3,000
g	Contractual: Amendment of QAPP	1	Lump Sum	\$3,000	Lump Sum	\$ 3,000
h	Construction: Waste Classification	10	samples	\$130	Sample	\$ 1,300
i	Construction: Mobilization / Demobilization	1	Lump Sum	\$20,000	Lump Sum	\$ 20,000
j	Construction: Excavation	3	days	\$8,250	day	\$ 24,750
k	Construction: Transportation and disposal	200	cu yards	\$80	cu yard	\$ 16,000
l	Construction: Regrading/site restoration	1	days	\$8,250	Lump Sum	\$ 8,250
m	Construction: Contingency (remediation contractor costs)	20	% of Items i, j, k, and l			\$ 13,800
n	Contractual: QEP Contractor Oversight and Management	3	Days	\$1,500	Day	\$ 4,500
o	Contractual: Post excavation Confirmatory Sampling	25	samples	\$300	Sample	\$ 7,500
p	Contractual: Remedial Action Reporting	1	Lump Sum	\$12,000	Lump Sum	\$ 12,000
					Task sub-total	\$ 154,000
					TOTAL	\$ 5,500,000
					EPA FUNDING	\$ 2,000,000
					HUD Funding	\$ 3,500,000

d. Plan to Measure and Evaluate Environmental Progress and Results

The RFCDA will maintain close coordination with all work to be funded under this project, tracking important EPA output metrics as well as funding leveraged, acres/number of buildings addressed, and jobs created. The RFCDA will track, measure and evaluate progress toward achieving the project outputs listed in section 3.b above primarily by utilizing EPA's ACRES system. In addition, the RFCDA will monitor project progress through documentation provided by all contractors/consultants and will provide this information to the EPA through regularly scheduled quarterly meetings with the EPA Project Officer, quarterly reports, annual reports, and regular correspondence.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. and ii. Organizational Structure and Description of Key Staff

As the lead economic development organization for Rome and Floyd County, RFCDA markets the community to new and existing industry prospects, representing public and privately-owned industrial property and buildings. RFCDA works closely with local and statewide stakeholders such as the City of Rome and Floyd County, the Georgia Department of Economic Development, Georgia Power Company, Norfolk Southern, and others. The RFCDA team has over 75 years of experience in economic development, and possesses the technical, administrative, and financial requirements to successfully lead this project. For example, RFCDA has successfully managed contractors, consultants and QEPs on numerous redevelopment efforts.

Missy Kendrick will serve as Project Director, overseeing the day-to-day implementation of the grant. Ms. Kendrick is the President and CEO and a full-time employee of RFCDA with 26 years of economic redevelopment experience. Missy has obtained and managed over \$1.5 million in Edge funds for local industries and \$1.2 million in US EDA grant funds. Board Member Doc Kibler will serve as Fiscal Manager of the EPA funds. He has served on the Development Authority board since 2013 and as Treasurer since 2019. Both are currently responsible for the oversight and management of the 2022 EPA Assessment grant.

iii. Acquiring Additional Resources

RFCDA will procure all contractors and consultants through a fair and open bid process consistent with federal procurement requirements, 2 C.F.R. 200 and EPA rule 2C.F.R. 1500. RFCDA will procure the QEP and remediation contractor(s) to implement the required grant funded activities. RFCDA will give extra consideration for professional service awards for firms that employ local residents.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: In 2022, RFCDA received an EPA Assessment grant (BF02D29722) for \$500,000.

(1) Accomplishments: ACRES accurately reflects our metrics, summarized below, at the time of application submission.

- Completed Community Relations plan, programmatic QAPP, and HASP; launched advisory team; conducted a brownfield inventory.
- Battley Business Complex mega-site: Completed Site-specific QAPP, Phase II, ACM / LBP surveys; and two ABCAs.

(2) Compliance with Grant Requirements

RFCDA is in full compliance with all associated work plans, schedules, terms and conditions. A procurement problem arose with the initial contractor however, as soon as the issue was identified, RFCDA worked collaboratively with EPA to quickly resolve and rectify the situation. The project performance period is 7/1/22 to 9/30/26. The project is now ahead of schedule with grant funds 57% expended and 100% encumbered. We anticipate early close out of the grant.

**US EPA FY24 Brownfield Cleanup Grant
Rome Floyd County Development Authority—Rome, GA
Threshold Criteria**

THRESHOLD CRITERIA

1. Applicant Eligibility:

- a. The Rome Floyd County Development Authority (RFCDA) is a unit of local government as defined under 2 CFR § 200.64. In 1962, the Georgia General Assembly amended to the Georgia Constitution to create the RFCDA as an official local public authority of Floyd County, Georgia.

Documentation is attached of Georgia Constitution Resolution (HR 491-965) creating RFDA as a local public authority.

- b. RFCDA is exempt from Federal taxation. RFCDA does not lobby the federal government. Legal opinion letter is included as part of **Attachment 1**.

2. Previously Awarded Cleanup Grants:

No EPA Brownfields Cleanup Grant funds have previously been expended on the Former Battey State Hospital site.

3. Expenditure of Existing Multipurpose Grant Funds

RFCDA does not have any open Multipurpose Grants.

4. Site Ownership Information:

RFCDA is the current owner of the Former Battey State Hospital site.

5. Basic site information:

- a) Former Battey State Hospital site (aka Northwest Georgia Regional Hospital)
- b) 705 North Division Street, Rome, GA 30165

6. Status and History of Contamination at the Site:

- a) Type of Contamination: The site is contaminated by hazardous substances.
- b) Operational History/Current Uses: The Former Battey State Hospital is a 132.5-acre former hospital campus located in North Rome that has been in decline for several decades and vacant since 2011. The Battey General Hospital property was initially developed in the early 1940s as a temporary hospital primarily serving tuberculosis patients. The site was transferred to the state of Georgia in 1946, and it was renamed Battey State Hospital with a continued focus on tuberculosis treatment and subsequently expanded. Areas of the property were redeveloped in the early 1970s to facilitate treatment of both tuberculosis and mental health patients. Renamed as the Northwest Georgia Regional Hospital, records reported that in 1977, the hospital was averaging 281 patients a day with a staff of 605 professionals, with 260 beds reserved for mental health patients and approximately 50 beds for tuberculosis patients. Reportedly, the inpatient tuberculosis unit was phased out in the 1990s and the facility began solely treating patients with mental health and disability conditions. The hospital closed due to a lack of funding and rising maintenance costs associated with the aging facility.

**US EPA FY24 Brownfield Cleanup Grant
Rome Floyd County Development Authority—Rome, GA
Threshold Criteria**

- c) Environmental Concerns. Remediation required prior to redevelopment at that site involves addressing the following environmental concerns: 1) the presence of Asbestos Containing Material (ACM) and Lead-Based Paint (LBP) that must be abated prior to rehabilitation or demolition of the 24 vacant homes and 33 non-residential buildings (57 total) on-site; and 2) up to 10 inches of surface soil impacted by lead concentrations exhibited above the applicable state standard of 400 mg/kg surrounding the perimeters of Buildings 803, 805, 807, 906, 908, and 912
- d) Causation, Nature, and Extent of Contamination. During the more than 70 years of operation as a large hospital campus, a variety of hazardous materials were used and managed for various operational activities including the campus motor pool, maintenance shops, a former incinerator, heating tanks and bio-hazard storage. Shuttered for over 13 years, the campus includes a total of 57 vacant structures in various stages of deterioration - several found to be associated with high levels of lead in soil exceeding soil cleanup criteria as well as substantial amounts of lead-based paint (LBP) and asbestos containing materials (ACM) in the buildings.

7. Brownfields Site Definition:

The Former Battey State Hospital site is:

- a) Not listed or proposed for listing on the NPL;
- b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
- c) Not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

The Former Battey State Hospital site has undergone significant site characterization. Significant environmental assessments have been completed on the site that qualify as an ASTM E1903-19 or equivalent Phase II environmental site assessment. Prior assessment efforts completed at the site include:

- UST Closure Reports, September 9, 1998
- Asbestos Assessments and Targeted Cleanup, 2004
- Phase I ESA, February 2012
- UST Closure Report, August 24, 2020
- Phase II ESA, May 18, 2021
- Phase I ESA, October 19, 2021
- Phase II ESA, September 2023
- ACM and LBP Survey Report, September 2023

**US EPA FY24 Brownfield Cleanup Grant
Rome Floyd County Development Authority—Rome, GA
Threshold Criteria**

9. Site Characterization

- a) Not applicable, RFCDA is not a State or Tribal Environmental Authority
- b) Please see **Attachment 2** for the letter from the Georgia Environmental Protection Division regarding the site's enrollment in the State Voluntary Remediation Program.
- c) Not applicable

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Former Battey State Hospital site.

11. Sites Requiring a Property-Specific Determination

A property-specific determination is not believed to be required for the Former Battey State Hospital site.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substances Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government:

- a) Circumstances of Acquisition: RFCDA acquired the property from the State of Georgia, another governmental entity, for the sole purpose of exercising RFCDA's charge to effectuate its redevelopment.
- b) Date of Acquisition: 2/8/2022
- c) Timing of Disposal of Hazardous Substances: Disposal of all hazardous substances at the site occurred prior to RFCDA's acquisition of the property.
- d) RFCDA has not caused or contributed to any release of hazardous substances at the site.
- e) RFCDA has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

Not applicable

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

- a) Information on the Property Acquisition: RFCDA acquired the property from the State of Georgia, another governmental entity, via direct purchase on 2/8/2022. RFCDA has sole ownership of the site. The RFCDA is not affiliated with prior owners/operators of the site.
- b) Pre-Purchase Inquiry: A Phase I ESA was completed October 2021 prior to the RFCDA acquisition.

**US EPA FY24 Brownfield Cleanup Grant
Rome Floyd County Development Authority—Rome, GA
Threshold Criteria**

- c) Timing of Disposal of Hazardous Substances: Disposal of all hazardous substances at the site occurred prior to RFCDA's acquisition of the property.
- d) Post-Acquisition Uses: Since the RFCDA's acquisition of the site, there have been no long term permitted uses and/or users of the site. The site remains vacant.
- e) Continuing Obligations: RFCDA conducted a Phase II and ACM/LBP survey at the site in order to effectuate the remediation of the property. There were no known continuing releases detected at the site. To prevent future releases and prevent/limit exposure, RFCDA does not have on-site uses until after remediation has been completed.

RFCDA is committed to:

- i. Complying with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;
 - ii. Assisting and cooperating with those performing the cleanup and provide access to the property;
 - iii. Complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
 - iv. Providing all legally required notices.
- b. Property Ownership Eligibility – Petroleum Sites:** Not applicable, the site is contaminated by Hazardous Substances.

13. Cleanup Authority and Oversight Structure:

- a. On 11/6/2023, RFCDA submitted an application to the Georgia Environmental Protection Division to enroll the site into the state Voluntary Remediation Program. This will allow the state to provide oversight of the cleanup activities.
- b. It is not anticipated that access to neighboring properties will be required. However, if it is, RFCDA will work with our community partners to describe the issue to surrounding property owners and will schedule the work in a way to minimize disruptions.

14. Community Notification documents:

- a. Analysis of Brownfield Cleanup Alternatives (ABCA). Two ABCAs were prepared for the cleanup activities. Draft ABCAs were provided for public review and comment. The ABCA information was presented to a public meeting as well.
- b. Community Notification: Prior to holding a public meeting, an ad was run in The Rome News Tribune (aka The Rome Times Journal) on 10/25/23. The local radio station, WRGA, advertised the public meeting on air as well as posted an article on their website on 10/25/2023.
- c. Public Meeting: A public meeting was held on October 27th via zoom and in person. Public comments and responses to the comments are included in the meeting minutes.

**US EPA FY24 Brownfield Cleanup Grant
Rome Floyd County Development Authority—Rome, GA
Threshold Criteria**

- d. Community Notification Documents: The ABCAs can be found in **Attachment 3**. See **Attachment 4**, proof of Community Notification Ad. See **Attachment 5** for the sign in sheet and meeting notes from the public meeting held on October 27th via zoom and in person.

15. Contractors and Named Subrecipients

- a. **Contractors:** RFCDA has not procured any contractors at this time which would be compensated with EPA funds made available under this RFA. Upon notification of award, procurement for EPA funded efforts will be conducted.
- b. **Subrecipients:** RFCDA does not intend to utilize subrecipients for implementation of the proposed EPA funded project.



Jeffrey W. Cown, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

November 9, 2023

Michael S. Regan, Administrator
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Battey Business Complex Site
Rome, GA
USEPA Brownfields Cleanup Grant Application FY2024

Dear Administrator Regan:

On behalf of the Georgia Environmental Protection Division, it is my pleasure to endorse the Rome Floyd County Development Authority's (RFCDA) Battey Business Complex's (Site) application to the United States Environmental Protection Agency (USEPA) for a Brownfields Cleanup Grant to remediate environmental contaminants associated with discharges of hazardous substances.

As per the FY24 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS, please note that the Site is eligible to be enrolled in our Georgia Voluntary Remediation Program (VRP). While not currently enrolled, the property has submitted an application for the property which was received on November 6, 2023. It is anticipated that the application will be processed and that the Site will be enrolled by January 30, 2024 to facilitate state oversight of the cleanup activities to be conducted with USEPA funding.

The Site has undergone significant site characterization. Prior assessment efforts completed at the site reportedly include:

- UST Closure Reports, September 9, 1998
- Phase I ESA, February 2012
- UST Closure Report, August 24, 2020
- Phase II ESA, May 18, 2021
- Phase I ESA, October 19, 2021
- Phase II ESA, September 2023
- ACM and LBP Survey Report, September 2023

There are no additional soil assessment activities anticipated to be performed at this time as sufficient data has been collected to develop the remedial action plan for the site's soils. There is a need for a groundwater investigation. It is my understanding that this work can be completed such that the site is expected to be ready to proceed to remediation by June 15, 2024.

Batthey Business Complex Site, Rome, GA
USEPA Brownfields Cleanup Grant Application FY2024
GA EPD Regulatory Letter
November 9, 2023

Please accept this letter of support and site characterization for the Batthey Business Complex Cleanup Grant application. Please do not hesitate to contact me if I may be of further assistance. I may be telephoned at (470) 524-4676, or, e-mailed at kevin.seaway@dnr.ga.gov.

Sincerely,



Kevin Seaway
VRP Unit Manager

- c: Missy Kendrick, Rome Floyd County Development Authority
(missykendrick@developromefloyd.com)
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