



1. Applicant Identification: City of Sanford, Florida  
PO Box 1788  
Sanford, Florida 32772
  
2. Funding Requested:
  - a. Grant Type: Single Site Cleanup
  - b. Federal Funds Requested: \$604,310
  
3. Location:
  - a. City: Sanford
  - b. County: Seminole
  - c. State: Florida
  
4. Property Information: Former Rosemond Property  
West State Road 46  
Sanford, Florida 32771
  
5. Contacts:
  - a. Project Director: Jeff Davis  
Public Works Project Manager  
407.688.5427  
Jeff.davis@sanfordfl.gov  
300 North Park Avenue  
Sanford, Florida 32771
  
  - b. Chief Executive/Highest Ranking Elected Official: Norton N. Bonaparte, Jr  
City Manager  
407.688.5009  
Norton.Bonaparte@sanfordfl.gov  
300 North Park Avenue  
Sanford, Florida 32771
  
6. Population: 63,154

7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
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.	
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).	2
The proposed site(s) is in a federally designated flood plain.	3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
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.	

8. Releasing Copies of Applications: N/A

## **EPA Brownfield Cleanup Grant - City of Sanford, Florida**

### **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 Sanford (City) is strongly committed to environmental justice, and the assessment, remediation, and subsequent reuse of properties that help disadvantaged neighbors have safe places to work, live, and play. The City, with a population of 63,154, is located in Central Florida and encompasses 19.1 square miles of land situated on the bank of Lake Monroe. One of Florida's oldest established cities, in 1870, Henry Sanford purchased the land with the belief that it would become a large transportation hub. This became reality as agriculture dominated the local economy until the 1940s earning Sanford the nickname of "Celery City". In response to the calamity of the Great Depression and as part of the New Deal to alleviate the despair besetting America, the Works Progress Administration built the National Guard Armory in Sanford in 1936. The City, as countless towns across America, benefited from the influence of Federal dollars. A US Naval Station was also established in 1942 shifting the focus away from agriculture to support the war effort. In 1971, Disney World further changed the local landscape to a tourism-related economy. The I-4 Interstate system construction diverted travelers away from the local roads within Sanford, contributing to the overall decline in population and income opportunities.

Since this time, the City has suffered from deteriorating housing, lack of adequate infrastructure, blighted commercial structures, low average income, high crime rate, poor health statistics, and proximity to brownfield sites. Over 70 potential brownfields sites were recently identified within the City. These include underground storage tank sites, chemical companies, drycleaners, transportation related facilities, and various vacant/abandoned properties.

Although the incident occurred in 2012, the stigma related to the fatal shooting of 17-year old Trayvon Martin remains. Following the shooting, the local media placed a huge focus on the City's housing crisis and the long-term neglect as the foundation for the community's unrest over this incident. The national media attention only intensified the resolve from these communities to stand up for change. In fact, the Trayvon Martin incident awoke other harrowing race-related memories of Sanford where the national media similarly took notice – including, but not limited to, when the City made national headlines in 1946, when a young Jackie Robinson was greeted by the Ku Klux Klan and booed off of the field at Sanford Stadium.

According to a 2018 article from the Orlando Weekly, Sanford ranked 97 out of 100 of the country's top 100 most dangerous cities, which looked at the number of violent crimes per 1,000 residents as well as property damage. Areavibes.com indicated that 2021 data still places Sanford 30% above the national crime average and 111% above the national violent crime average.

In addition, hurricanes and significant rain events regularly occur in Central Florida. As the "lightning capitol of the world", Sanford is also burdened with underperforming drainage systems throughout the City, which contributes to frequent flooding. During these events, City staff has limited mobility to reach hard hit areas and assist citizens.

The predominately minority communities of Goldsboro and Georgetown were the focus of the City's previous Brownfield Assessment Grant BF00D32215, in which 22 brownfield redevelopment sites were assessed and prepared for revitalization. As a continued effort to promote improvement and inclusion in this area of the City, the proposed site for this Cleanup Grant is the Former Rosemond Property (Site) which consists of 2.99 acres of historically commercial property located on West State Road 46, approximately 950 feet south of Lake Monroe, 0.5 miles west of downtown Sanford, within the Historic Goldsboro Community. The Historic Goldsboro Community generally encompasses Census Tract

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12117020500 which is the focus of the target area for this grant. A total of 2,661 people reside in this census tract.

### **ii. Description of the Proposed Brownfield Site(s)**

Historical documentation indicated the Site was developed by 1917 as a fertilizer warehouse for the Virginia-Carolina Chemical Company. Sanborn Maps showed a railroad spur bordering the building to the east, suggesting that the railroad spur was used to transport materials for the Virginia-Carolina Chemical Company. In addition, the former Sanford Gasification Plant Superfund Site (SGP) was located approximately 1,645 feet south of the Site. Contamination from the SGP bled into small creeks which traversed from the facility to Lake Monroe. The adjacent Cloud Branch Creek, which hydraulically connects the referenced SGP with Lake Monroe and the western boundary of the Site, was also impacted from these historical activities. Remediation of the former SGP included portions of Cloud Branch Creek. No recorded cleanup activities have been documented for the Site.

Prior to the City taking ownership of the property, a Phase I Environmental Site Assessment (ESA) and a Phase II ESA Report was completed. The Phase II ESA identified soil and groundwater impacts above applicable cleanup target levels. Specifically, arsenic, benzo(a)pyrene, and total recoverable hydrocarbons were identified in the soil while aluminum, ammonia, manganese, and vanadium were identified in the groundwater. An Analysis of Brownfields Cleanup Alternatives (ABCA) was prepared which selected source removal of contaminated soil with offsite disposal as the preferred method of remediation. Approximately 1,200 cubic yards of impacted soil will be excavated and disposed of offsite at an approved landfill. The area will then be backfilled with clean soil. Post active remediation groundwater monitoring will continue until applicable state clean-up criteria are achieved. Given the planned commercial/industrial use for the Site, one option is to obtain a conditional closure through the use of a restrictive covenant prohibiting the use of groundwater at the Site. Conditional closure for groundwater is an efficient and cost-effective method to reduce exposure to contaminated groundwater at the Site. Left dormant since the Virginia-Carolina Chemical Company vacated, the Site contains the partially buried former building footprint and heavy vegetation. It is unknown if any relict subsurface infrastructure remains beneath the Site. All of these features will need to be removed as part of the remediation efforts.

### **b. Revitalization of the Target Area**

#### **i. Reuse Strategy and Alignment with Revitalization Plans**

To better serve the community, the Former Rosemond Property will be redeveloped into a Public Works facility with an onsite stormwater detention pond. The new structure will include kitchen facilities and be rated to withstand a Category 4 hurricane so that emergency management staff will be able to remain onsite and be responsive to the local community needs after storms. This will ultimately result in quicker cleanup efforts and shorter interruption of services to the local community. Day to day operations will also be conducted from this location. With the new facility online, additional upgrades to City utilities are planned over the next several years. As the facility will be used to support the local municipal workforce, the planned use supports high-quality jobs, strong labor practices, and equitable workforce pathways. The Site is zoned for general commercial purposes, which aligns with the use of the surrounding properties.

The City's Community Redevelopment Agency (CRA) and the Economic Development Team are hard at work promoting vacant and underutilized brownfield sites throughout the City. New construction, redevelopment, and site improvement status was documented in the [CRA's 2022 Annual Report](#). The CRA funded a total of \$504,702 worth of projects during 2022. Progress continued as the City's [Fall 2023 Development Report](#) indicated that 28 redevelopment projects have been permitted and approved for construction while another 33 are in negotiations. Significant projects include multiple housing units,

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hotel, church, restaurants, food market, day care center, and commercial/industrial plazas. The 4,504 residential units, 931,613 square feet of industrial space, and 582,554 square feet of commercial space will substantially increase the tax base, provide availability to jobs, decrease crime, offer support services for the community, reduce food scarcity, and reduce blight and underutilized space in the City. The various housing projects have an affordable housing and market-rate housing component. These projects don't even touch upon the City's planned improvements including the significant expansion of the Public Works facility planned for the Former Rosemond Property. With the significant planned developments across the City, it is at the utmost importance to provide quicker emergency management response time and prepare for the increase demand on the public utility infrastructure to ensure continuation of services. As the Site is located within Flood Zone AE and the surrounding area is naturally prone to flooding, a large stormwater detention pond has also been designed for the Site. This climate resilient feature will benefit the surrounding area as it will assist in stormwater runoff drainage to assist in stormwater runoff drainage.

As part of this project and many others, the City partners with various community organizations to discuss priorities, deficiencies, and to further develop trust within the minority communities. Two partners include: Goldsboro Front Porch and Sanford Main Street. The groups have discussed the need for additional food options, job opportunities, and replacement of the failing infrastructure. All three of these are priorities for the City's Revitalization Plans and are addressed under the City's Fall 2023 Development Report, which redevelopment of the Site would support.

### **ii. Outcomes and Benefits of Reuse Strategy**

The new Public Works facility will provide more timely emergency management response time after storms and improvements for the overall utilities system, as the demand on the public utility infrastructure continues to increase. These planned improvements will spur additional development in the surrounding area as additional units may come online to benefit from the expansion. There is also a State-wide emphasis to end the use of septic systems and replace these systems with City sewer, as septic drain fields are the largest contributor of wastewater to the groundwater and are the most frequently reported sources of groundwater contamination. The new Public Works facility and future improvements will play a key role in addressing these planned multi-phased improvements and will continue to address needs of the community wherever, whenever, and however possible.

The proposed Site design includes a stormwater detention pond with a littoral shelf and planted wetland area (pretreatment area). In addition to improving the local climate adaptation/mitigation capacity and protecting nearby residents and investments from flooding, the benefits of the pretreatment area allow for a more natural space for fish and wading birds. Adjacent to the stormwater pond will be a preserved greenspace utilized as an outside patio/break area. The area will be large enough to host internal and external (community) special events. In the bid documents, the City has requested contractors to incorporate design options such as solar on the roof of the building along with other renewable energy sources, which could reduce the City's carbon footprint and add to the climate resiliency of the project.

### **c. Strategy for Leveraging Resources**

Since the assessment activities completed under the City's Brownfield Assessment Grant in 2018, the City has been progressing on plans for the expansion of the Public Works facility. The City hired an engineering firm to prepare the design of the proposed 12,500 square foot building with 5,000 square foot canopy, and 8,000 square foot stormwater pond with associated topographic survey, tree study, wetlands investigation, engineering feasibility, geotechnical investigation and permitting. The City has budgeted for the Site development activities detailed herein at an estimated cost of \$343,000 with an

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additional \$4 Million costs expected for the building development. Site plans were first developed for the Site in 2018. Since then, construction costs have significantly increased due to inflation and the global supply chain shortages and disruptions associated with the COVID-19 crisis. The City is seeking EPA Cleanup Grant funding to remedy the soil and groundwater contamination so the City may use budgeted funds for the Site work and building infrastructure and not have to decrease the size of the facility due to lack of funding. If EPA Cleanup Grant funding is not realized, the facility expansion may be delayed and/or decreased in size. The proposed facility layout is needed to house all Public Works personnel in one single location as planned, in opposition to the current multiple buildings.

### **i. Resources Needed for Site Characterization**

Previous Phase I ESA and Phase II ESA Reports were funded under the City's previous EPA Brownfield Assessment Grant. The City is prepared to provide additional funding if it is determined that the Site needs to be further characterized for the remediation to continue.

### **ii. Resources Needed for Site Remediation**

The remediation of the Former Rosemond Property is expected to cost \$604,310 based on current plans, bid estimates and recent discussions with remediation companies. The EPA Cleanup Grant funding requested in this application will be sufficient to complete the remediation of the Site for the City. If additional costs are identified during source removal activities, the City is prepared to cover these costs. The City has budgeted the expected cost of \$343,000 for Site development activities with an additional \$4 Million expected for building development. As previously stated, construction costs have significantly risen since initial project conception in 2018, so the City is seeking this grant award such that remediation and construction of the facility remain feasible.

### **iii. Resources Needed for Site Reuse**

As shown in the table, the requested Brownfield Cleanup grant money will contribute approximately 14% of the total project costs.

Name of Resource	The resource is for...	Secure or Unsecure	Details
EPA Brownfields Cleanup Grant	Remediation	Unsecure	\$604,310
City of Sanford	Reuse	Secured	~\$4.3 Million

### **iv. Use of Existing Infrastructure**

The Public Works facility expansion will tie into existing infrastructure and adjacent commercial utilities providing electricity, sewer, water, and telecommunication services to the Site. As previously referenced, the Site is located within Flood Zone AE and the surrounding area is prone to flooding, a large detention pond has been designed for the Site to assist in stormwater runoff drainage for the area. The proposed Site design includes a stormwater detention pond with a littoral shelf and planted wetland area (pretreatment area). The pretreatment area allows for a more natural space for fish and wading birds.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **a. Community Need**

#### **i. The Community's Need for Funding**

This grant aims to address the needs of the community by remediating impacted property and redeveloping the Site into a Public Works facility for the City. The community faces challenges securing funding for environmental remediation and subsequent reuse due to factors such as small population size, low-income levels, high housing costs, and lower education levels. By providing financial support, this EPA Brownfield grant can not only help these communities overcome financial barriers and carry out

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necessary environmental remediation, but also expand Public Works services and prepare the community for future growth, redevelopment, and opportunities.

Data Type	Census Tract*	Florida	United States
Population	<b>2,661</b>	20,901,636	324,574,097
Black/African American %	<b>49%</b>	15.17%	13.43%
Individuals below 200% federal poverty line	<b>57%</b>	27.05%	24.55%
Low Median Income (As a % of area median income)	<b>42%</b>	105.21%	100.09%
Housing Cost (<80% median income and spending >30% on housing)	<b>52%</b>	26.83%	24.85%
Higher Education (% with less than high school diploma)	<b>17%</b>	11.55%	12.16%
Asthma (18 or older)	<b>46.6%</b>	17.43%	21.15%
Diabetes (18 or older, other than during pregnancy)	<b>62.01%</b>	24.67%	23.75%
Low Life Expectancy	<b>71.59 years</b>	78.37 years	78.31 years
Proximity to Superfund sites	<b>56%</b>	12.85%	13%
Underground storage tanks and releases (# of tanks)	<b>13.4</b>	6.85	4.30

\*This census tract is considered disadvantaged because it meets more than one burden threshold and the associated socioeconomic threshold. From the Council on Environmental Quality (2022, November 22). Climate and Economic Justice Screening Tool.

### ii. Threats to Sensitive Populations

This census tract is disproportionately disadvantaged on *ALL* of the metrics stated in the above table. The target area is home to a high concentration of low-income persons and people of color, both considered sensitive populations. In addition, the Former Rosemond Property is located within 1/2 mile of a hospital, a church, a day care facility, and Lake Monroe. This community is located adjacent to a disproportioned amount of Superfund sites and underground storage tank sites potentially leading to an increased rate of asthma, diabetes and a lower life expectancy.

#### (1) Health or Welfare of Sensitive Populations

This subject area of this grant is adversely and disproportionately affected by environmental and health risks and considered disadvantaged due to its ranking in the 93<sup>rd</sup> percentile of individuals living below 200% federal poverty line, 97<sup>th</sup> percentile individuals living below 100% federal poverty line, 96<sup>th</sup> percentile in housing costs, 95<sup>th</sup> percentile in proximity to Superfund site, 92<sup>nd</sup> percentile to underground storage tanks and releases, 96<sup>th</sup> percentile to low median income, 97<sup>th</sup> percentile of poverty, and 17<sup>th</sup> percentile in higher education.

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

Due to the community being close to hazardous substances and petroleum products from Superfund sites and underground storage tanks and releases, the target area is also ranked very high in vital health issues including the 94<sup>th</sup> percentile in Asthma cases, 92<sup>nd</sup> percentile in Diabetes cases, and 94<sup>th</sup> percentile in low life expectancy. According to the Florida Department of Health, age-adjusted cancer incidence in

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Seminole County (including the City) sharply increased from 374 per 100,000 in population in 2013-2015 to 420 per 100,000 in population in 2018-2020.

### (3) Environmental Justice

#### (a) Identification of Environmental Justice Issues

With 46% of the neighborhood population experiencing poverty and 49% representing Black/African American populations, coupled with the elevated number of existing brownfields sites, equates to the core definition of Environmental Justice. Poverty rates of the neighborhood population are 225% greater than the Florida average. Therefore, the tax base for the City to address environmental issues is limited.

#### (b) Advancing Environmental Justice

To battle this, the City is actively recruiting and incentivizing development projects into the community and pledging City funds for additional projects. This Cleanup Grant and the expansion of the Public Works facility will contribute to promoting Environmental Justice in the community and further demonstrate a pledge for improvements to the community. Specifically, the continuing presence of Federal assistance to address and remediate these adverse environmental impacts while improving and strengthening the shared resources of the local community will be a tangible reminder to the community that the City has not been overlooked, and indeed matters.

### b. Community Engagement

#### i. Project Involvement/ii. Project Roles

Name of Organization	Point of Contact (email)	Specific Involvement
Goldsboro Front Porch	Kenneth Bentley <a href="mailto:Kenneth_bentley@scps.k12.fl.us">Kenneth_bentley@scps.k12.fl.us</a>	Represent neighborhood interests, provide project input, work to promote peace
Sanford Main Street	Dan Ping <a href="mailto:director@sanfordmainstreet.com">director@sanfordmainstreet.com</a>	Represent neighborhood interests, provide project input, work to promote peace
City of Sanford	Jeff Davis <a href="mailto:jeff.davis@sanfordfl.gov">jeff.davis@sanfordfl.gov</a>	Local entity, landowner, Project lead providing updates on project status, promoting equality
Florida Department of Environmental Protection	Lu Burson <a href="mailto:Lu.Burson@dep.state.fl.us">Lu.Burson@dep.state.fl.us</a>	Florida Brownfield Coordinator to provide document review and approval
CPWG Engineering	Jason Kendall <a href="mailto:Jason.Kendall@madridcpwg.com">Jason.Kendall@madridcpwg.com</a>	Engineering consultant for the project
SCS Engineers	Amy Guilfoyle <a href="mailto:aguilfoyle@scsengineers.com">aguilfoyle@scsengineers.com</a>	Environmental consultant for the project
To be determined	To be determined	Construction company for the project

#### iii. Incorporating Community Input

Community involvement is critical to the success of this and other City projects. The City has regularly scheduled meeting with various community groups including the two mentioned in the grant application: Goldsboro Front Porch and Sanford Main Street.

In addition, a public meeting was held on November 9, 2023 with notice posted on the City's website and emails to community groups. The City requested public comments and questions regarding the application and engineering plans. Due to health-related concerns and/or limited transportation means, the public is also able to contact Mr. Mike Cash, Public Works Manager, to discuss any concerns. If EPA



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Cleanup grant funds are secured, documents such as project detail sheets and the ABCA will be readily available for review at the office of Public Works. Additionally, to demonstrate project transparency and local involvement, public meetings will be scheduled quarterly at the Commission Chambers and will be noticed to the public via similar means. The Goldsboro Front Porch, Sanford Main Street, and local community leaders will be invited to the public meetings.

### 3. TASKS DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

#### a. Proposed Cleanup Plan

A Phase I ESA was completed in May 2018, which identified recognized environmental conditions (RECs) at the property. A Phase II ESA confirmed the presence of contaminants of concern (COCs) associated with the RECs. To address contamination at the Site, three cleanup alternatives were presented in the draft ABCA and are as follows:

Alternative #1: *No action* – does not address the hazards associated with contaminated soil

Alternative #2: *Engineered Control* – does not remove contamination; not cost effective due to maintenance/inspection of the control for perpetuity

Alternative #3: *Source Removal of Contaminated Soils with Offsite Disposal* – exposure to contaminated soil is eliminated.

The most effective and comprehensive solution in reducing exposure to contaminated soil at the Site is Alternative #3: Source Removal of Contaminated Soils with Offsite Disposal. Approximately 1,200 cubic yards of impacted soils will be excavated and disposed of at an approved landfill to clean up the contaminated soil. Post active remediation groundwater monitoring will continue until state clean-up criteria are achieved. Given the planned commercial/industrial use for the property, conditional closure for impacted groundwater will be obtained through the use of a restrictive covenant prohibiting the use of groundwater at the Site, once the criteria is met. Conditional closure for groundwater is an efficient and cost-effective method to reduce exposure to contaminated groundwater at the Site. We estimate that the total costs to address contamination at the property will be approximately \$604,310.

#### b. Description of Tasks/Activities and Outputs

It is expected that the following tasks and activities will be conducted and completed in up to a 36-month period, from July 2024 to August 2027.

##### **Task 1: Program Management**

###### i. Project Implementation:

This task includes all aspects of grant management. Implementation: 1) Cooperative Agreement compliance oversight; 2) community development plan; 3) create SharePoint site for document repository; 4) quarterly progress reporting; 5) annual disadvantaged business enterprise (DBE), women-owned business enterprise (WBE), minority-owned business enterprise (MBE) and federal financial report (FFR); 6) entries in the EPA Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database; 7) assist with workplan; 8) travel, accommodation, and attendance for two City of Sanford employees to three national/regional/grantee brownfield training conferences/workshops and two State Brownfields Conferences; 9) Final Technical Report summarizing accomplishments, expenditures, outcomes, outputs, lessons, learned, and resources leveraged.

###### ii. Anticipated Project Schedule:

Quarterly (1<sup>st</sup> Quarter Year 1, 2<sup>nd</sup> Quarter Year 1, 3<sup>rd</sup> Quarter Year 1, 4<sup>th</sup> Quarter Year 1, and so on, until project completion) and annual reporting (4<sup>th</sup> Quarter Year 1, 4<sup>th</sup> Quarter Year 2, and so on,

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until project completion). ACRES entries when cleanup is completed. Closeout reporting at completion of cleanup.
iii. <u>Task/Activity Lead</u> : City of Sanford will be the lead with input provided by a Qualified Environmental Provider (QEP) and development team.
iv. <u>Outputs</u> : Up to 16 quarterly reports with budget and schedule status; up to four annual reports; ACRES reporting; SharePoint site for document repository; and Final Technical Report.
<b>Task 2: Community Engagement</b>
i. <u>Project Implementation</u> : 1) Quarterly milestone community meetings during the grant term; 2) outreach materials including fact sheets, press releases, and website updates; and 3) solicitation and responses to community input. Supplies are budgeted for the printing of outreach materials and office supplies.
ii. <u>Anticipated Project Schedule</u> : Public meetings will be held beginning after grant award and continue quarterly to discuss progress at the site until completion; outreach materials will be made available before cleanup; input will be gathered at community events and when provided directly via email, social media, or other method.
iii. <u>Task/Activity Lead</u> : City of Sanford will be the lead with support provided by a QEP.
iv. <u>Outputs</u> : It is anticipated that thirteen community meetings will be held between July 2024 to August 2027, with development of notes/presentation materials; 2-3 project fact sheets; project updates on the City’s website; summary of community meetings in EPA required quarterly reports, and community involvement plan.
<b>Task 3: Cleanup</b>
i. <u>Project Implementation</u> : 1) Finalize ABCA; 2) prepare and obtain approval of a quality assurance project plan (QAPP) that details all project cleanup related sampling protocols and quality assurance/quality controls; 3) health and safety plan; 4) prepare and implement the Source Removal Report including all permitting and prework submittals, site preparation, source removal and disposal of contaminated soil, post-active remediation groundwater monitoring, developing a groundwater restrictive covenant for recordation.
ii. <u>Anticipated Project Schedule</u> : Final ABCA and QAPP completed and approved by 7/15/2024. Implementation of cleanup plan 7/15/2024 through 8/31/2026; Draft Final Technical report submitted by 8/31/2026.
iii. <u>Task/Activity Lead</u> : QEP will oversee remedial contractor under the direction of the City of Sanford.
iv. <u>Outputs</u> : Final ABCA; Final QAPP; Health and Safety Plan (HASP); Groundwater Restrictive Covenant; and Source Removal Report.

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**c. Cost Estimates**

Below are the anticipated cost estimates for this project based on past brownfield projects as determined by local market standards discussed with local environmental consultants with contractual hourly rates based on the skills needed for the specific tasks. The budget for this project includes administrative, travel, supplies, and contractual costs only. Over 90% of the budget will be spent on the Site-Specific work through the Cleanup Task (Task 3).

Task 1 – Project Management: Administrative – City Staff support of grant activities \$5,000 (\$50 x 100hrs); Travel – One City staff to attend six training events/conferences \$12,000 (flights at \$800, 3 nights in hotel at \$300, incidentals and per diem at \$75/day [4 days] x 1 attendees x 6 events). Contractual – ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$25,650 (\$135 x 190 hrs).

Task 2 – Community Engagement: All City costs related to the Community Engagement Task will be in kind and not charged to the Grant. Contractual – Brownfield website, outreach Brochure/Handouts, Social Media Posts \$2,160 (\$135 x 16 hrs); 13 Community Meetings \$4,500 (\$173 x 2hrs/meeting; \$346/meeting); Supplies – Outreach supplies \$1,500 (printed brochures \$500 [500 x \$1.00]; printed display boards \$500 [5 x \$100]; notebooks, paper, pens, other miscellaneous office supplies \$500).

Task 3 – Cleanup: All costs related to the Cleanup Task will be contractual for the effort involved with the removal of contaminated soil. Quarterly groundwater sampling events, as required to reach conditional closure for groundwater. 1) Permitting: \$7,500; 2) Mobilization/demobilization: \$12,000; 3) Site Preparation: \$12,000; 4) Remove and dispose of 10,000 square feet of concrete: \$25,000; 5) Excavate, transport, and dispose of 2,000 tons of contaminated soil: \$150,000; 6) Provide, place, and compact approximately 1,200 cubic yards of clean fill: \$47,000; 7) Pre/post surveys: \$22,000; 8) Quarterly groundwater monitoring for eight quarters: \$120,000; 9) Oversight and reporting: \$143,000

Budget Categories	Project Tasks (\$)			Total
	Task 1 – Project Management	Task 2 – Community Engagement	Task 3 - Cleanup	
Personnel	\$5,000	\$0	\$0	\$5,000
Fringe Benefits	\$0	\$0	\$0	\$0
Travel	\$12,000	\$0	\$0	\$12,000
Equipment	\$0	\$0	\$0	\$0
Supplies	\$0	\$1,500	\$0	\$1,500
Contractual	\$25,650	\$6,660	\$263,000	\$295,310
Construction	\$0	\$0	\$290,500	\$290,500
Other (inc. sub awards)	\$0	\$0	\$0	\$0
<b>Total Direct Costs</b>	<b>\$42,650</b>	<b>\$8,160</b>	<b>\$553,500</b>	<b>\$604,310</b>
Indirect Costs	\$0	\$0	\$0	\$0
<b>Total Budget</b>	<b>\$42,650</b>	<b>\$8,160</b>	<b>\$553,500</b>	<b>\$604,310</b>

**d. Measuring Environmental Results**

The City’s team will report outputs, outcomes, accomplishments, expenses, data acquired, personnel changes, and other pertinent information through the ACRES reporting system quarterly and with a final report at the end of the cooperative agreement. Anticipated outputs: various public meetings, one ABCA,

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one QAPP, removal of contaminated soil, backfill with clean fill soil, and monitoring groundwater quality for Site closure. The most obvious anticipated outcomes will include the reduced risk of public exposure to contaminated soil and a new public works facility to support the community.

### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

#### **a. Programmatic Capability**

##### **i. Organizational Structure**

The City has a successful history in managing many types of grants and has current employees that were involved with the prior EPA Brownfield Assessment Grant, as well as other entities brownfield grants (Seminole County). The City's Public Works Team will take the lead on the grant implementation as they are ultimately familiar with the Site and the engineering plans. This will ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the project. The City will be supported by engineering and environmental firms.

##### **ii. Description of Key Staff**

Mike Cash, the City's Public Works Manager, has put together a project team that will ensure a successful grant implementation. Jeff Davis will lead the redevelopment as Project Director. With 32 years with the City, Jeff has acted as the Public Works Project Manager for the last 8 years leading capital improvement and roadway projects for the City. Marlon Hooks will support Jeff as the Second in Command. Marlon is the Senior Inspector for Public Works overseeing all street maintenance and related projects and recently earned his Certified Project Manager Certification. Cynthia Lindsay, Finance Director, will act as the Financial Contact with over a decade of financial background, overseeing public works and utilities.

##### **iv. Acquiring Additional Resources**

The City has a proven procurement process and previously contracted with engineering and environmental firms to initiate Site redevelopment. The construction activities will go out to bid in a similar matter and quotes will be obtained from at least two companies for comparison. The City reserves the right to throw out these bids and rebid the project if needed. The selected construction contractor will provide all required licenses before beginning work.

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

##### **i. Currently Has or Previously Received an EPA Brownfields Grant**

The City was awarded an EPA Brownfield Assessment Grant BF00D32215 of \$400,000 for the assessment of petroleum and hazardous substances within the City boundaries. The historic neighborhoods of Goldsboro and Georgetown were the focus of the grant in which 22 brownfield redevelopment sites were assessed and prepared for revitalization between 2015 and 2019.

##### **(1) Accomplishments**

A total of 22 brownfield redevelopment sites were assessed under the former Brownfield Assessment Grant including 20 phase I ESAs, 8 phase II ESAs, one Generic Quality Assurance Project Plan (QAPP), one Community Involvement Plan, 8 Site Specific QAPPs, and 8 Site Specific Health and Safety Plans. Multiple meetings were held throughout the life of the grant to update the EPA, City and community on the progress of the grant. These outputs should be accurately reflected in the Assessment, Cleanup and Redevelopment Exchange System (ACRES) at the time of this application.

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

Work was conducted in general accordance with the workplan, schedule, and terms and conditions under the previous assessment grant. All reports and associated information were uploaded to ACRES as of the time of this application. Upon completion of the assessment activities at twenty-two brownfield redevelopment sites, all grant funds were expended.

## Threshold Criteria Response - City of Sanford, Florida

1. Applicant Eligibility:
  - a. The City of Sanford, Florida is a local government entity that is eligible for funding.
  - b. The City of Sanford is not exempt from Federal taxation under 501c(4) of the Internal Revenue Code.
2. Previously Awarded Cleanup Grants: The City of Sanford has not received funding from a previous EPA Brownfields Cleanup Grant.
3. Expenditure of Existing Multipurpose Grant Funds: The City of Sanford does not have an active EPA Brownfields Multipurpose Grant.
4. Site Ownership: The City of Sanford currently owns the two subject parcels. The Seminole County Property Appraiser records are provided in **Attachment A**.
5. Basic Site Information:
  - a. Former Rosemond Property
  - b. West State Road 46, Sanford, Florida 32771
6. Status and History of Site:
  - a. Hazardous Substance or Petroleum: The Site is contaminated by hazardous substances.
  - b. Operational history and current use of the site: Historical documentation indicated the Site was developed as of 1917 with a fertilizer warehouse for the Virginia-Carolina Chemical Company. Sanborn Maps also showed a railroad spur bordering the building to the east suggesting that the railroad spur was used to transport materials for the Virginia-Carolina Chemical Company. The Site has been left dormant since the Virginia-Carolina Chemical Company vacated.
  - c. Environmental concerns: Contaminants of concern were identified at concentrations above regulatory limits in soil and groundwater. Specifically, arsenic, benzo(a)pyrene, and total recoverable hydrocarbons are impacting soil and aluminum, ammonia, manganese, and vanadium are impacting groundwater.
  - d. How the site became contaminated, and to the extent possible, describe the nature and extent of the contamination: It is likely that the contamination came from past usage by the former Virginia-Carolina Chemical Company. Approximately 1,200 cubic yards of impacted soil has been identified from ground surface to up to 4 feet below ground surface in three areas on the Site.
7. Brownfields Site Definition: The Former Rosemond Property meets the definition of a brownfield site. The Site is not listed or proposed for listing on the National Priorities List; not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and not subject to the jurisdiction, custody, or control of the U.S. government.
8. Environmental Assessment Required for Cleanup Grant Applications: To investigate the recognized environmental conditions identified in the prior Phase I ESA Report (May 11, 2018), a Phase II ESA was completed with a report submitted to the City, dated November 9, 2018. Soil and groundwater samples were collected for laboratory analysis as part of the Phase II investigation.
9. Site Characterization: The Site is eligible to be enrolled in a voluntary response program and will enroll in said program before the grant award date. A sufficient level of site characterization has been completed to date for the remediation work to begin. Please see **Attachment B** for the FDEP Letters.

## Threshold Criteria Response - City of Sanford, Florida

10. Enforcement or Other Actions: The City of Sanford is unaware of any ongoing or anticipated environmental enforcement or other actions related to the Site for which Brownfield Grant funding is sought.

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 City of Sanford is not liable for the contamination at the Site and meets the requirements for asserting an affirmative defense to CERCLA liability through one of the landowner liability protections (e.g., the bona fide prospective purchaser liability protection per CERCLA § 101(40)). The City of Sanford conducted all appropriate inquiries prior to acquiring the property by hiring a qualified environmental consultant to prepare an ASTM International Standard Practice E 1527-13 Phase I ESA Report for the Site, dated May 11, 2018. The assessment identified recognized environmental conditions in connection with the Site, therefore a Phase II ESA Report was produced, dated November 9, 2018. Portions of the Phase I ESA were updated at the time of the Phase II ESA to be compliant. Site conditions remained similar with no new indications of any releases/spills on the subject Site or adjacent parcels. The City of Sanford 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 City of Sanford acquired the property. The City of Sanford exercises appropriate care by taking reasonable steps to address releases, including stopping continuing releases and preventing threatened future releases and exposures to hazardous substances on the Site. The City of Sanford complies with land use restrictions and does not impede the effectiveness or integrity of any institutional controls associated with response actions at the Site. The City of Sanford provides full cooperation, assistance, and access to authorized persons. The City of Sanford complies with any CERCLA information requests and administrative subpoenas, and provides all legally required notices with respect to the discovery or release of any hazardous substances found at the Site. The City of Sanford does not impede performance of a response action or natural resource restoration onsite.

13. Cleanup Authority and Oversight Structure:

- a. The City of Sanford intends to enroll in the voluntary response program. A qualified environmental consultant was hired to oversee the cleanup activities and coordinate with the FDEP on cleanup matters and reporting. The qualified environmental consultant was selected based on a competitive procurement process.
- b. No offsite access is likely to be needed for the cleanup activities.

14. Community Notification:

- a. The Draft Analysis of Brownfields Cleanup Alternative was provided for public comment. Please see **Attachment C**.
- b. Community Notification Ad: An ad was placed on the City of Sanford website and disseminated to community groups. Please see **Attachment D**.
- c. Public Meeting was held on November 9, 2023. The PowerPoint presentation and sign in sheet are summarized in **Attachment E**. There were no public comments received.
- d. Community Notification Documents – Please see **Attachments C** through **E**.

15. Contractors and Named Subrecipients:

Contractors: The City's Request for Qualifications was posted on My Vendor Link and the Orlando Sentinel on September 22, 2022 as BID NUMBER: RFQ 21/22-33. Addendum 1 was released on

## Threshold Criteria Response - City of Sanford, Florida

October 4, 2022 to extend the due date until October 27, 2022. A total of 48 entities downloaded the bid documents. Four contractors submitted Statements of Qualifications, with SCS Engineers being selected for the contract. Please see **Attachment F** for details.



# FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

November 3, 2023

Esmeralda Vargas  
Brownfields Program  
U.S. Environmental Protection Agency  
61 Forsyth Street, S.W. 10<sup>th</sup> Floor  
Atlanta, GA 30303-8960  
[Vargas.Esmeralda@epa.gov](mailto:Vargas.Esmeralda@epa.gov)

Dear Ms. Vargas:

The Florida Department of Environmental Protection (Department) acknowledges and supports the City of Sanford's Brownfields grant application for a Brownfields Cleanup Grant for the site located on Seminole County parcels 25-19-30-300-0200-0000 and 25-19-30-514-0000-0130. The Department understands that this application has been prepared in accordance with the U.S. Environmental Protection Agency's (EPA) guidance document EPA-I-OLEM-OBLR-23-15, titled "Guidelines for Brownfield Cleanup Grants." This letter of acknowledgement addresses the requirement for a "Letter from the State or Tribal Environmental Authority," described in SECTION IV.D.8. EPA Brownfields grant funding will strengthen the City's cleanup and redevelopment efforts. This federal grant effort also supports Florida's Brownfields Redevelopment Act and the Department's role in administration of site rehabilitation of contaminated sites.

The Department encourages EPA grant recipients to use the incentives and resources available through Florida's Brownfields Redevelopment Program with EPA grant funding to enhance the success of their Brownfields project. The Department recommends that the City consider including Brownfields sites or areas that could potentially receive federal funding in a state-designated Brownfield area. The City is also encouraged to contact Lu Burson, the Central District Brownfields Coordinator, at (407) 897-2912 to learn more about the Florida Brownfields Redevelopment Program.

Sincerely,

A handwritten signature in blue ink that reads "Billy Hessman".

Billy Hessman, P.G., Environmental Manager  
Brownfields and CERCLA Site Screening Section

BH/jc

cc:

Melissa Schick, SCS Engineers – [mschick@scsengineers.com](mailto:mschick@scsengineers.com)  
Lu Burson, DEP Central District – [lu.burson@floridadep.gov](mailto:lu.burson@floridadep.gov)





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61 Forsyth Street, S.W. 10<sup>th</sup> Floor  
Atlanta, GA 30303-8960  
[Vargas.Esmeralda@epa.gov](mailto:Vargas.Esmeralda@epa.gov)

Dear Ms. Vargas:

The Florida Department of Environmental Protection (Department) acknowledges that the City of Sanford plans to conduct the cleanup of a brownfield site(s) and is applying for an FY24 EPA Brownfields Cleanup Grant.

The City of Sanford has developed an application requesting site-specific federal Brownfields Cleanup funding for the Rosemond Properties located off of State Road 46. Due to a lack of registered street addresses, the properties are hereby identified as Seminole County parcels 25-19-30-300-0200-0000 and 25-19-30-514-0000-0130.

The Department affirms that the Rosemond Properties:

- i. Are eligible to be enrolled in the State voluntary response program;
- ii. Are not currently enrolled, but the City of Sanford intends to enroll the sites in the voluntary response program by executing a Brownfield Site Rehabilitation Agreement with the Department;
- iii. Previous assessment has identified contamination that would warrant remediation. There will be a sufficient level of site characterization from the environmental site assessment(s) performed by June 15, 2024, for the remediation work to begin on the site.

For any questions regarding this letter, please contact Justin Cross at (850) 245-8968.

Sincerely,

A handwritten signature in blue ink that reads "Billy Hessman".

Billy Hessman, P.G., Environmental Manager  
Brownfields and CERCLA Site Screening Section