



WINSTON COUNTY BOARD OF SUPERVISORS

R04-24-C-008

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THREE - MARION JORDAN
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FIVE - CHARLIE WILKES, JR.

RUSTY FOSTER
Chancery Clerk
KELLI RIVES
Bookkeeper and Purchasing Clerk
HUGH HATHORN
Board Attorney

Narrative Information Sheet

1. **Applicant Identification:** Winston County Board of Supervisors
P.O. Box 69
Louisville, Mississippi 39339
2. **Funding Requested:**
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$2,297,900
3. **Location:**
 - a. City: Louisville
 - b. County: Winston County
 - c. State: Mississippi
4. **Property Information:**
 - **Winston County Development Building**
923 South Church Avenue
Louisville, Mississippi 39339
5. **Contacts:**
 - a. Project Director:
Glen Haab
(662)773-8719
glen@winstoncounty.com
P.O. Box 551
70 West Park Street
Louisville, MS 39339
 - b. Chief Executive/Highest Ranking Elected Official:
Luke Parkes, President
(662)773-7170
lparkes@winstoncounty.org
P.O. Box 69
136 South Court Street
Louisville, MS 39339



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6. **Population:**

Louisville, Mississippi – 5,795 (2020 US Census)

7. **Other Factors Checklist:**

<u>Other Factors</u>	<u>Page #</u>
Community population is 10,000 or less.	p. 3
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).	
The proposed site(s) is in a federally designated flood plain.	
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.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	
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 Application** – Not applicable. No confidential, privileged or sensitive information is presented in the grant application

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfields Challenges and Description of Target Area: The City of Louisville (population 6,124) in Winston County, Mississippi is nestled in the rolling "Red Hills" of East Central Mississippi, in the area commonly referred to as the "Pines Region," where timber and timber products have always played a significant role in the cultural, commercial, and industrial heritage of our community. Winston County and Louisville (the target area) are both named for Louis Winston (1784-1824), who was a colonel in the militia, a prominent lawyer, and a Mississippi Supreme Court Justice. Choctaw Indian legends say the tribe originated at Nanih Waiya in the southeastern part of Winston County. A large mound at Nanih Waiya is a sacred place to the Choctaws and is preserved today as a Mississippi State Park. Winston County was formed in the 1830s from lands ceded to the United States in by Chief Greenwood LeFleur, the Chief of the Choctaws, in the Treaty of Dancing Rabbit Creek.

As the county seat of Winston County, Louisville is considered the Gateway into North Mississippi. Highways 15 and 25 merge and intersect Highway 14 (Main Street) in the center of Louisville, creating a critical point in our state for north/south/east/west travel. The Kansas City Southern Rail line and Church Avenue, running north-south, has served as a major thoroughfare for commerce. At times, the forestry and the wood products industries have brought us a better quality of life. At other times, these industries have left a legacy of lost jobs, lost opportunities, environmental stigma, and environmental contamination. The rise and fall of the American Creosote (Superfund) facility and the Georgia Pacific plywood plant are two examples to name a few. When the Great Recession forced Georgia Pacific to shutter its plywood plant in 2009, 60 workers lost their jobs. At that time, the City of Louisville stepped forward and purchased it in hopes of finding a buyer to restart the wood products engine; and on March 28, 2014, the City celebrated the sale of the shuttered Georgia Pacific brownfield to New Wood Resources LLC. However, the celebration was short lived because on April 28, 2014 (a mere 30 days later), tragedy hit our small, rural community. An F4 tornado struck, ten lives were tragically lost, and dozens more from our community were injured. Among the three industrial buildings that were destroyed, the Georgia Pacific plywood plant lay in ruin. The area's only hospital, the Winston Medical Center, was also severely damaged. Of the 23 tornadoes that raked across Mississippi on April 28th, the 185 mph monster that tore diagonally across Winston County was the most powerful, destroying 391 buildings – more than half of the buildings destroyed statewide.

However, we in Winston County and in Louisville have remained resilient and determined to drive economic development for the benefit of our citizens. In 2017, the EPA saw our citizens' determination and need and awarded the City of Louisville with their first Brownfield Assessment Grant, which was successfully closed out in 2020. The City of Louisville then was awarded a second Brownfield Assessment Grant in 2022, which is already resulting in great advances for the City and Winston County. Through funding provided by both assessment grants, the Winston County Development Building property (located in Louisville) has been assessed and cleanup planning activities have been performed. The Winston County Development Building property is an industrial facility that is owned by Winston County and is currently leased and operated by Taylor Power Systems. However, vapor intrusion impacts from a legacy chlorinated solvent plume on the site are limiting future operational expansions in the building because of worker safety concerns. The Winston County Development Building has incredible promise in creating the jobs our citizens desperately need.

The Winston County Development Building – the focus of this Brownfield Cleanup Grant application – is located in **West Louisville (Census Tract 9503) – the target area for this Cleanup Grant**. West Louisville is roughly 150 acres of land bounded to the north by Cagle Street, to the east by South Church Avenue, to the south by the Winston County Development Building property, and to the west by Eiland Middle School and Warren Chapel Church of God on Pond Avenue and a heavily wooded area adjacent to the American Creosote Superfund Site. The West Louisville target area is also a target area for the City of Louisville's current Brownfield Assessment Grant. Much of our more impoverished areas are located in West Louisville, and encouraging re-investment in this target area requires additional resources and efforts to remove environmental and financial uncertainties. Louisville's industrial history coupled with the 2014 tornado tragedy have resulted in dozens of brownfield and vacant/underutilized (V/U) sites in the West Louisville target area. Award of this cleanup grant would be a significant next step in the continuity Louisville's already-successful brownfield program, and will result in moving a site from the assessment phase to full cleanup, and the expansion of an important revenue source for the City and the expansion of job opportunities. We appreciate your consideration of our proposal.

ii. **Description of the Proposed Brownfield Site:** The former **Winston County Development Building site** (ACRES No. 237224) is located at 912 South Church Avenue in Louisville, Winston County, Mississippi. The property is irregularly-shaped and consists of approximately 26 acres. The property is occupied by an approximate 400,000-square-foot building located on the east side of South Church Avenue. Hughes Creek borders the property to the east. The property is located in Section 4, Township 14 North, Range 12 East of the Choctaw, Mississippi Meridian USGS 7.5-minute Topographic Maps. More specifically, the site is more

specifically located at 33° 06' 00.11" North latitude and 89° 03' 31.70" West longitude. The site is located south of downtown Louisville in a mixed-use area that includes industrial, commercial, and residential properties. The surrounding properties currently consist of commercial properties to the west, including an animal clinic, a storage facility, a construction material yard, and a convenience store. An industrial plywood facility is located to the northeast beyond Hughes Creek, and a multi-family residential property is located to the south. Historically, the surrounding land use consisted of residential and agricultural land until the early 1970s when commercial and industrial development in the area began.

The property was first developed in the early 1960s by the Spartus Clock Manufacturing Company, which operated at the property until 1996, when Spartus was acquired by General Time Corporation. The Spartus Company manufactured clocks at the facility, and clock manufacturing operations included painting and plating operations. The property was acquired by Winston County in 1997 and leased to the Teters Floral company, which used the building as a distribution center for silk flowers. The eastern portion of the building was destroyed by a tornado in 2014 and the Teters Floral company moved out of the property in January 2017. The property was acquired by Winston County shortly after Teters Floral operations ceased. Hewlett Manufacturing, which manufactures offshore oil filters and other products, conducted plastic molding operations in the northwestern portion of the building until March 31, 2019. Hewlett Manufacturing maintained machinery that performed molding, shaping, and cutting processes used to manufacture their products. Some flammable liquids were stored within the building but kept in secured chemical cabinets. Taylor Machine Works—Logistics Division and Hardwire, LLC (a Taylor Machine Works support company) currently leases and operates in the building. Operations performed by Taylor Machine Works are forklift assembly and completing Department of Defense contract needs.

Six environmental investigations have been performed on the site, all funded either by Winston County or the City's Brownfield Assessment Grant. These include a 2018 Phase I Environmental Site Assessment (ESA), and Phase II ESA, a 2020 Phase III ESA and Sub-Slab Soil Gas and Indoor Air Sampling event, and 2022 Vapor Intrusion Mitigation and Indoor Air Sampling and 2022 Indoor Air Sampling study.] The Groundwater sampling revealed elevated concentrations of the volatile organic compounds (VOCs) perchloroethylene (PCE) and its degradation products (TCE, cis-1,2-dichloroethene, and vinyl chloride on the western portion of the site and downgradient on the eastern portion of the site. The source of PCE, TCE, and their degradation products are commonly related to the use of solvents and degreasers. Elevated concentrations of 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene – which are typically associated with degraded petroleum fuel and hydrocarbon solvents – were also detected in the groundwater collected from a temporary well on the western portion of the site. The 2020 Phase III ESA further confirmed these findings and also confirmed that contamination was moving towards the adjoining Hughes Creek.

Results from the 2020 Sub-Slab Soil Gas and Indoor Air Sampling event revealed VOCs in all three sub-slab soil gas samples collected. VOCs detected included benzene, 2-butanone (MEK), chloroform, chloromethane, dichlorodifluoromethane, ethanol, methylene chloride, propylene, PCE, and TCE. Chloroform and TCE concentrations were above the applicable commercial EPA Vapor Intrusion Screening Level (VISL) values VOCs were also detected in five of the eight indoor samples submitted. TCE was also detected in six indoor air above the commercial VISL value. Results from subsequent indoor air sampling events in 2022 further confirmed the presence of TCE concentrations exceeding the commercial VISL value.

Winston County has owned the Winston County Development Building site since 1997. Winston County and the City of Louisville are committed to expanding real opportunities and jobs to area citizens and are committed to improving workers' health and safety, and the cleanup of the Winston County Development Building site is essential to our plans.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans:

The City of Louisville's 2016 Comprehensive Plan, envisions the Winston County Development Building site as remaining industrial and , and sparking additional industrial growth in the area once remediated. The Plan outlines two industrial goals and associated objectives for Louisville:

- Goal 1: Promote an environment that provides Louisville with an array of industrial uses.
- Goal 2: Generate additional employment opportunities within Louisville.

One of the objectives associated with Goal 1 is for the City to *work with Winston County to attract industry to industrial lands available*. Cleanup and expansion of industrial uses of the Winston County Development Building site will not only help Taylor Machine Works expand their operations, but it will also make the surrounding industrial park area more attractive to other industries by improving environmental conditions in the industrial park. Two of the Goal 2 objectives are to *strengthen and increase employment opportunities* and to *provide incentives which serve to enhance the creation of jobs and reuse of vacant buildings*. Cleaning up the site will directly support the objective of *creating jobs by allowing expansion of operations in the building*, thereby providing more employment opportunities. This cleanup grant will also directly support the objective of

providing incentives to enhance job creation by providing funding (incentive) to Taylor Machine Works to expand operations and then to purchase the site from Winston County, which has not occurred due to environmental issues with the site. The Winston County Development Building site is not located in a federally-designated flood plain.

The Comprehensive Plan also includes a general land use goal (Goal 5) to *advocate and encourage quality commercial, industrial and residential construction and development*. An objective associated with this goal specifically focuses on *protecting public health, safety, and general welfare*. The cleanup of the chlorinated solvent plume and the application of a vapor barrier to improve air quality in the industrial building will immediately support this objective by further protecting health of workers and those living nearby. Also, as shown by Taylor Machine Works’ hesitancy in purchasing the site due to environmental stigma and contamination, Taylor Machine Works is considered a “quality industrial” employer, which is the type of employer the City of Louisville and Winston County want for the community. In 2014, after the EF4 tornado, Winston County considered demolition of the building. Using the City’s 2017 EPA Brownfield Assessment grant, the public and project partners were involved in community outreach events and members of the Brownfield Advisory Committee used this input to develop the reuse strategy. It was decided that the EPA Assessment grant was to be used to assist a prospective purchaser, Taylor Machine Works, with due diligence as a bona fide prospective purchaser that then led to additional assessment and development of the reuse strategy identified by the BAC.

ii. Outcomes and Benefits of Reuse Strategy: The cleanup of the Winston County Development Building site will immediately improve air quality for workers and will clean up subsurface contamination impacting the site and surrounding sites. Cleaning up the Winston County Development Building site and removing the health, safety and environmental hazards will be an active measure to ensure environment impacts to the surrounding underserved community are addressed the right way. Additionally, the expansion of operations in the building on site is estimated to result in the creation of at least ten direct jobs. With commitments to the Army (2021) and the Marine Corps (2019) to produce commercial cranes modified for military use, the economic development impact stands at potentially \$261.7 million for the community through this Mississippi-based firm. Fulfilling these commitments is significantly impaired due to the limited expansion of operations into those areas with environmental impacts under the manufacturing operation.

c. Strategy for Leveraging Resources:

i. Resources Needed for Site Characterization: Though we are confident that the Winston County Development Building site has been fully characterized, should additional characterization be necessary, Louisville’s current City-Wide Brownfield Assessment Grant has sufficient funds to support additional environmental assessments. Additionally, MDEQ was recently awarded a nearly \$2M Statewide Brownfield Assessment Grant, and these funds are available to offset further site characterization needs if our existing grant cannot cover those.

ii. Resources Needed for Site Remediation and iii. Resources Needed for Site Reuse: It should be noted that Winston County purchased the property in 1997 out of an earnest desire to support the economic development and expansion of the site. We have funded environmental assessments out of our own coffers, and Louisville’s Brownfield grant assessment funds have also been used to perform environmental site assessments and to develop an ABCA. The requested Cleanup Grant funding for this project is believed to be adequate in cover all cleanup activities. However, should additional funding be required, the County can utilize the MDEQ Brownfield Revolving Loan Fund (RLF).

iv. Use of Existing Infrastructure: The Winston County Development Building site is connected to our network of streets and utilities including electrical, natural gas, water, and sewer, and the existing building will continue to be used. In fact, the proposed cleanup activities will result in more of the building being used.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding:

A major source of revenue for Winston County and the City of Louisville is from local sales tax collections. Between State Fiscal Years (SFY) 2019 and 2020, the City’s revenue from local sales tax dropped 3.8%.ⁱⁱⁱ The tax base

COMMUNITY NEED	WEST LOUISVILLE	MS	USA
Unemployment: ⁱ	6.8% ³	5.8%	4.9%
Poverty Rate: ¹	39.5%	22.6%	15.6%
Median Family Income: ¹	\$39,393 ⁱⁱ	\$49,125	\$65,443

has dropped over the years due to a significant population decrease, resulting in substantial strain on the city government finances. From the 2010 U.S. Census Data, Louisville’s population was at 6,631. Currently, based on the 2020 U.S. Census Data, Louisville’s population is 5,795, which is a decrease of 14.4% in the tax base. According to EJSscreen, nearly 40% of families in the City of Louisville are living below the poverty level, compared to 22.0% in the State of Mississippi and 15% in the nation. The per capita income of Louisville residents is over \$12,000 less than

the national average, and the median family income is \$26,000 less than the national average. The loss of business and jobs has negatively impacted the tax revenues available for Louisville. Basic services, such as roads, sewer, and water are the priorities for City sales tax revenue, leaving the City unable to draw on this source of funding to address environmental concerns at Brownfield sites – like the identified priority sites. The target area of West Louisville is in need of other funding sources to spark redevelopment of brownfields like the Winston County Development Building site. Cleanup of the Winston County Development Building site will spur economic expansion by the current tenant, Taylor Machine Works, and will also make the property more attractive for potential future occupants and operators.

ii. Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations:

The health and welfare issues affecting the sensitive population in West Louisville are best resolved by the creation of new job opportunities. Poverty is a catalyst for many health/welfare crises, and in West Louisville – our most impoverished citizens are often disabled and are minorities. Investment and redevelopment in our city and county will spur more employment opportunities and eventually a wider variety of stores and businesses. When meaningful redevelopment occurs in an area, it is a catalyst for change in the entire area. We know that expansion of operations by Taylor Machine Works will create jobs and opportunities for the surrounding citizens in the West Louisville target area. Increased job opportunities will provide more salary opportunities for the minority and disabled populations in the target area and will reduce the rate of unemployment, poverty, and children eligible for free/reduce priced lunches (which exceeded the national average by 77%). We are committed to doing what it takes to use grant funds for the economic benefit of our citizens.

HEALTH & WELFARE STATISTICS	WEST LOUISVILLE	MS	USA
Percent Minority: ^{ix}	<u>63.8%</u>	40.7%	26.2%
Children Eligible for Free/Reduced Price Lunch ^{iv}	<u>92.7%</u>	72.2%	52.4%
Percent Disabled ^l	<u>19.9%</u>	16.4%	12.3%

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

The United Health Foundation ranks Mississippi dead last among the 50 states with respect to overall health conditions. **Mississippi ranks 50th in all three populations - women's, infants', and children's health.** It ranks 50th in the behaviors, community & environment, and outcomes categories. **Mississippi ranks 50th in infant mortality, child mortality, low birthweight, neonatal mortality, and preterm birth.**^{viii} Health statistics demonstrate that children – particularly infants – in Louisville are being disproportionately affected by health conditions (low birth weight) and death. Also, the Mortality (Premature Death) Indicator listed in the table above reports Years of Potential Life Lost (YPLL) before age 75 per 100,000 population for all causes of death, age-adjusted. The Winston County Premature Death Indicator exceeds the national indicator by nearly 140%. **This indicator is relevant because a measure of premature death can provide a unique and comprehensive look at overall health status.**¹⁷

DISEASE / HEALTH CONDITION	WINSTON COUNTY	MS	USA
Infant Mortality ^v	<u>11.7</u>	10.1	6.5
Low Birth Weight ¹³	<u>17.8%</u>	12.1%	8.2%
Asthma ^{vi}	<u>16.1%</u>	12.0%	13.4 %
Mortality, Premature Death ^{vii}	<u>15,766</u>	10,168	6,588

Short-term side effects of exposure to chlorinated solvents like TCE include dizziness, fatigue, headaches, and/or skin rashes. Long-term side effects may include chronic skin problems, and/or damage to the nervous system, kidneys, or liver. Some chlorinated solvents are also known to cause cancer, in both humans and animals. Cleaning up the chlorinated solvent plume on site will immediately remove further potential for the aforementioned conditions to workers and residents nearby. Also, inhaling chlorinated solvent vapors significantly increases the likelihood of the aforementioned conditions, so applying a vapor barrier will prevent these vapors from entering our citizens' workspaces, thereby reducing the likelihood of short-term and long-term symptoms and side effects.

(3) Environmental Justice:

(3)(a) Identification of Environmental Justice Issues: Also, according to the Agency for Toxic Substances and Disease Registry's (ATSDR) EJ Index, the Census Tract where the site is located has an EJ Index of 0.98. Considering the EJ Index ranks census tracts from 0 to 1 based on EJ issues – with 0 being no EJ issues and 1 being the most potential EJ issues – an EJ Index of 0.98 is significant. Our Census Tract received this high EJ Index due to the the high unemployment rate; a large population of children; a large African American population; a high estimated prevalence of asthma, cancer, high blood pressure, and diabetes; proximity to Superfund sites; proximity to Risk Management Plan (RMP sites); and its high air toxics cancer risk. The ATSDR also assigned an environmental burden rank of 0.83 and a social vulnerability rank of 0.77 to the target area.

According to EJScreen, the most significant environmental risk factor for the target area is the Superfund Proximity indicator which is **two orders of magnitude higher** than for EPA Region 4. In fact, the ATSDR completed its Public Health Assessment for exposure to Groundwater, Surface Water, Soil, and Sediment on

September 30, 2016^x for residents around the Superfund site. In it, they concluded that “2 to 5 additional cases of cancer might occur due to the exposure” to PAHs and dibenzofuran from off-site Hughes Creek surface water and that “1 to 9 additional cases of cancer might occur due to the exposure” to PAHs and dibenzofuran from off-site Hughes Creek sediments by residents. These environmental concerns in the above table pose a cumulative public health impact. Since every significant exposure pathway (i.e., ingestion, inhalation, and dermal contact) can be accounted for in the table, the cumulative effect results in greater than normal incidences of disease and adverse health conditions as detailed in Section 2.a.ii.2 above.

ENVIRONMENTAL CONCERNS ^x	LOUISVILLE	MS	EPA REGION 4	USA
Superfund Proximity (sites/km distance)	<u>0.87</u>	0.06	0.08	0.13
NATA Air Toxics Cancer Risk (risk per MM)	<u>53</u>	46	42	40
NATA Respiratory Hazard Index	<u>2.0</u>	1.6	1.7	1.8
Lead Paint Indicator (% pre-1960 housing)	<u>33%</u>	16%	16%	30%

Another environmental issue that could have a cumulative impact on the residents and the environment is related to **water quality in the Hughes Creek** that runs through the City of Louisville, through the target area, and adjoins the Winston County Development Building site. On April 27, 2015, the EPA’s On-Scene Coordinator “observed significant creosote sheening on the surface waters of Hughes Creek. Dark liquid and dark

liquid ‘bubbles’, suspected to be creosote, were noted in the sediments of the creek.”^{xii} It is suspected that creosote in a former creek bed that lies outside the containment cell of the nearby Superfund site is the cause of the creosote into Hughes Creek. “Creosote is a mixture of numerous hazardous substances, primarily poly aromatic hydrocarbons (PAHs), that **pose a threat to human health and ecological receptors**. The creosote release is impacting surface water and sediments in Hughes creek. The various hazardous substances that make up creosote are being carried downstream resulting in **offsite contamination**.”^{xii} Cleanup of the Winston County Development Building site’s groundwater would eliminate the potential for further contamination of Hughes Creek, which has been proven to be a receiving water body for the groundwater on the site. Also, addressing both the plume and vapor intrusion issues will lower the cancer risk for workers and nearby residents.

(3)(b) Advancing Environmental Justice: This grant will advance environmental justice by focusing funding on one of the most disadvantaged communities in the City and County. By eliminating environmental hazards that are currently posing threats to the surrounding community, this grant and the reuse plan for the expansion of industrial activities on the site will advance environmental justice among underprivileged populations in our target community, thereby alleviating the health disparities that exist throughout the City and County. This expansion of operations will also advance environmental justice by meeting one of the communities’ most pressing needs: job creation.

This grant will not cause or contribute to the displacement of the City’s or the County’s impoverished communities. The cleanup and expansion of operations – and thereby jobs – will improve air quality for workers on the site, reduce rates of disease like cancer (chlorinated solvents are known carcinogens), and improve the quality of life for our low-income, minority community by providing more job opportunities. None of the cleanup or planned expansions and redevelopment will displace businesses or residents because Taylor Machine Workers has operated on the site for years without displacing the surrounding community.

With inflation driving prices to all-time highs in recent years, redevelopment projects can sometimes come with particular apprehension. With redevelopment often comes increases to the cost of living in urban areas. As these areas become more attractive and, in turn, more costly, it drives low-income populations away out of sheer desperation. The City of Louisville – our project partner and the City where the site is located – has made it a priority outlined in their Comprehensive Plan to bring new job opportunities to local residents. Cleanup and expansion of operations on the site will simultaneously provide additional comfortable, livable wages to locals and provide an avenue for low-income individuals. The goals of this grant are to clean up a chlorinated solvent plume, prevent further migration of the chlorinated solvent plume to the already-impacted Hughes Creek, improve air quality for workers at Taylor Machine Works, and allow Taylor Machine Works to expand operations into other areas of the building following clearance samples after the installation of a vapor barrier.

b. Community Engagement:

i. Project Involvement and ii. Project Roles: The City of Louisville’s two Brownfield Assessment Grants have only been successful because of the fervor of our residents and the active role that they and our leadership play. While we at Winston County did not manage these grants, we were heavily involved in the implementation and planning for them, and we have learned through Louisville’s Brownfield grants that success comes from actively engaging community members and involving them in the process from beginning to end. We have selected project partners who are rooted in West Louisville and have the ability to reach all cross-sections of the community in that target area, thereby encouraging community input and support throughout this project. Each of the identified entities will have meaningful involvement in the cleanup and future reuse of the site and will be effectively engaged and informed throughout this grant. The City of Louisville’s existing EPA-Approved Community Involvement Plan (CIP) will be modified and expanded to reflect the Winston County Development Building project and project partners.

Name	Point of Contact	Specific Involvement
City of Louisville	Mayor Will Hill, 662.773.9201, [REDACTED]	Additional assessment funding through their EPA Brownfield grant (if needed), community engagement coordination.
Louisville/Winston Co. Chamber & Main Street	Amy Hillyer, Director 662-773-8719 amy@winstoncounty.com	Promote MERA sales tax rebate for cleanup, and serve on BAC.
MDEQ	Thomas Wallace 601.961.5240 twallace@mdeq.ms.gov	Resource, Corrective Action Plan approval, liability protection, incentives
Golden Triangle Planning and Development District	Phylis Benson, 662.320.2007, pbenson@gtpdd.com .	BAC, USDA/MDA/TVA grant leveraging, infrastructure funding.
Taylor Machine Works	Scott Hollenhead, 662.773.3421, shollenhead@taylorbigred.com	As tenant and BFPP, Taylor will provide access to area requiring remediation and provide capital improvements to building as well as expansion of facility, jobs, and once purchased by Taylor, Taylor will be contribute to property taxes and full site reuse.
First Baptist Church	Terry Carter – 662-773-6246 info@fbclouisville.org	Current BAC Member, establish future reuse option, communicate with residents/workers, and use of facility for Community Engagement.

iii. Incorporating Community Input: In 2017, the City of Louisville formulated a plan for involving the community during their first assessment grant, and then in 2022, the City further refined this plan. Winston County and the City of Louisville regularly work closely together, so Winston County plans to use the elements already developed in the CIP associated with Louisville’s assessment grant with added focus on risk communication for worker protection and vapor intrusion. Louisville’s CIP already includes a provision for methods of communicating with the public, regularly scheduled meetings with the affected community, meetings of project partners, and a discussion of the site selection process.

A Brownfield Advisory Committee was also formed by the City of Louisville’s existing Brownfield grant. This same BAC will be utilized during this grant due to the location of the site. The BAC is comprised of representatives from the community, local realtors, bankers, city officials, consultants, members of chambers of commerce, local business and industry representatives, Winston County health and economic development corporations, and environmental representatives. Several meetings have been held that have focused on the Winston County Development Building site, the latest on November 6, 2022. Notification was given regarding the intent to submit the cleanup grant as well as an update on current activities associated with the ongoing assessment grant. An overview of how the brownfields program and potential benefits to the community were discussed, along with the environmental impacts and planned redevelopment of the Winston County Development Building site. The meeting drew local residents, partners, and City officials. Concerns regarding the groundwater impacts and vapor intrusion issues were discussed openly, and the interest level for cleanup of the site and redevelopment for job creation was high. The meeting was advertised in advance, and a draft of the Analysis of Brownfield Cleanup Alternatives (ABCA)/grant proposal was available for review. No objections to the project were raised, and we are confident that we have full community support for the cleanup of the site.

Upon award of this Cleanup Grant, an additional meeting will be held prior to scheduling of cleanup activities, which will be advertised through the previously used effective methods (website updates, social media posts, direct responses by phone, or meetings and email based on the preferences of the inquirer). Meetings will be held in person when possible, but Google Meet and Zoom Meetings will also be used to be inclusive. Periodic briefings will be posted on the brownfield section of the Winston County Board of Supervisors website and social media pages as the project progresses.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan:

Field activities will be conducted in general accordance with applicable sections of the EPA, Region 4, Quality Systems and Technical Procedures and the MDEQ Assessment and Remediation Branch regulations, requirements, and protocols. The Environmental Professional (“Consultant”) will perform oversight of contractors for the well installation, ISCR injections, PRB injection, and vapor barrier application. The Consultant will also perform subsequent, necessary groundwater sampling activities and indoor air monitoring activities in order to document and confirm cleanup technologies are effective. Finally, following completion of cleanup, the Consultant will oversee the plugging and abandonment of wells. Conditions encountered in the field that impact the cost of the project or stated project goals will be promptly relayed to the client, the MDEQ project manager, and the EPA project manager. The work plan will then be modified, if necessary, to address feedback

from the client and the MDEQ. The selected Consultant will serve as the Safety Officer for the duration of the remediation project. The Consultant and Contractors will provide documentation of current Occupational Safety and Health Administration (OSHA) 40 CFR 1910.120 training and annual medical surveillances. A site health and safety plan (HASP) will also be prepared. The HASP and documentation of training will be available for review at the site during cleanup activities.

A draft ABCA that presented several cleanup alternatives to address environmental impacts/issues at the Winston County Development Building site was developed in October 2023. Details of the selected cleanup alternatives are provided below:

Horizontal ISCR Injection Wells with PRB: This portion of the cleanup plan/project will involve injecting chemical reducing agents (both ISCR and ERD inoculum) into the groundwater via four horizontal injection wells to be installed beneath the current building structure. The goal of ISCR is to destroy contaminants exceeding restricted and unrestricted Tier 1 TRG concentrations on the site through chemical reduction. Currently, these contaminants pose a threat to those working in the overlying structure and to the down-gradient gaining stream, Hughes Creek. Under this portion of the project, the site will be enrolled in the MDEQ Brownfield Program under the Voluntary Cleanup Program (VCP). Four, 4-inch injection wells will be installed beneath the building with approximately 350 feet of screen, targeting the treatment interval. Approximately 175,000 gallons of ISCR and ERD compounds will be injected within the subsurface treatment area. A PRB will also be injected along the eastern property line, before Hughes Creek, in order to prevent migration of contaminants to the receiving stream.

Vapor Barrier Installation: This portion of the project will include preparation and sealing of all concrete surfaces within the proposed work area. A chemical resistant, vapor intrusion coating system will then be applied to the concrete surfaces within the work area. The coating system will be rated for forklift traffic, thereby allowing for continued industrial use and supporting operations.

A full description of the cleanup plan and logic used to estimate the cost is included in the ABCA. The MDEQ has also concurred that adequate sampling has been conducted.

b. Description of Tasks/Activities and Outputs: The cleanup grant guidelines for this section request that (i) Project Implementation; (ii) Anticipated Project Schedule (iii), Task Activity/Lead, and (iv) Outputs be addressed. Due to the close relation between these items and for ease of presentation, we have addressed these criteria in a single table, provided below. This table provides a detailed listing of the major tasks to be completed, the activities/subtasks associated with each task, the schedule for completion, who will lead task efforts, and the anticipated outputs. Projected costs for each of the major subtasks/outputs are included in *Section 3.C, Cost Estimates*.

i. Project Implementation / Tasks	Activities/Subtasks	Details ii. Project Schedule	iii. Task Activity/Lead	iv. Outputs
TASK 1 Project Management	Execute Cooperative Agreement	Within 30 days of award	Applicant	Executed Cooperative Agreement, grant management oversight, contract with an EP, EPA kickoff meeting, 12 quarterly reports in ACRES database, closeout documents
	Grant Management	Continuous	Applicant	
	Select/Finalize Contract with Environmental Professional (EP)	Prior to award	Applicant	
	Prepare EPA Progress Reports	Quarterly	Applicant & EP	
	Travel to Brownfield Conference	Year 1	Applicant	
	Kickoff Mtg with EPA and BAC	30 to 60 days after award	Applicant	
	Final Closeout	30 days after grant closeout	Applicant and EP	
TASK 2 Community Involvement	CIP (<i>utilize CIP prepared for Louisville assessment grant and expand upon</i>)	Within 30 days of award	Applicant & EP	CIP; 3 meetings
	Community Mtgs.	Quarters (Q) 1, 5, 11, and 16	Applicant & EP	
TASK 3 Cleanup Planning	MDEQ Brownfield/VCP Meeting and Enrollment	Q1	Applicant & EP	SSQAPP; Final ABCA; meeting with MDEQ; development of bid specifications, and bid
	Site-Specific QAPP	Q1	EP	
	Final ABCA and Cleanup Plan	Q1	EP	
	Prepare Bid Documents	Q1	EP	

i. Project Implementation / Tasks	Activities/Subtasks	ii. Project Schedule	iii. Task Activity/Lead	iv. Outputs
	Subcontractor Selection for ISCR injection, PRB injection, and/or vapor barrier installation (may be multiple contractors)	Q2	Applicant	documents; selection of contractors
TASK 4 Cleanup Activities	Installation of horizontal injection wells and injection of ISCR compounds and reporting	Q2	EP	ISCR injection, PRB injection, vapor barrier application, air monitoring report, ten groundwater sampling events and reports (one year quarterly, three years semi-annually), P&A report
	Injection of PRB and reporting	Q2	EP	
	Vapor intrusion coating system installation (vapor barrier installation) and reporting	Q2	EP	
	Confirmation air monitoring following vapor barrier installation and reporting	Q2	EP	
	Quarterly performance monitoring and reporting	Q2, Q3, Q4, and Q5	EP	
	Semi-annual performance monitoring and reporting	Q6, Q8, Q10, Q12, Q14, and Q16		
	Plugging and abandoning (P&A) of wells and reporting	Q16	EP	

c. Cost Estimates: The anticipated budget for each of the tasks described above are provided in the following table:

Cost Estimates						
Budget Categories		Project Tasks (\$)				Total
		Project Mgmt	Community Involvement	Cleanup Planning	Cleanup Activities	
Direct Costs	Personnel¹	\$10,000	\$10,000	\$3,000		\$23,000
	Fringe Benefits					
	Travel	\$2,600				\$2,600
	Equipment					
	Supplies					
	Construction				\$1,998,200	\$1,998,200
	Contractual	\$15,000	\$15,000	\$25,000	\$219,100	\$274,100
	Other					
Total Direct Costs		\$27,600	\$25,000	\$28,000	\$2,217,300	\$2,297,900
Indirect Costs						
Total Budget		\$27,600	\$25,000	\$28,000	\$2,217,300	\$2,297,900

PROJECT MANAGEMENT COST DETAILS: \$27,600.00

County Grant Manager project mgmt./reporting: \$100/hr x 100 hrs = \$10,000

County Grant Manager and Mayor travel expenses for attendance at one BF conference: \$2,600 (no labor, only conf. fee, travel/expenses)

EP to assist with project mgmt./reporting: \$150/hr x 100 hrs. = \$15,000

COMMUNITY INVOLVEMENT COST DETAILS: \$25,000

County Grant Manager community involvement: \$100/hr x 100 hrs = \$10,000

EP to assist with CIP, community meetings, outreach, etc.: \$150/hr x 100 hrs. = \$15,000

CLEANUP PLANNING COST DETAILS: \$28,000

County Grant Manager cleanup planning (bid specs, etc.): \$100/hr x 30 hrs = \$3,000

EP to assist with cleanup planning (bid specs, etc.): \$150/hr x 167 hrs. = ~\$25,000

CLEANUP ACTIVITIES COST DETAILS: \$2,217,300

Construction: \$1,998,200

Injection wells:

Installation of four injection wells beneath the site structure (supplies and subcontractor) = \$343,200

Injection of ISCR and ERD compounds at the site (supplies and subcontractor) = \$900,000

Installation and Oversight of Injectible Permeable Reactive Barrier PRB Injection (supplies and subcontractor) = \$375,000.00 Plugging and abandonment: Plugging and abandoning ten monitoring wells = \$20,000.00 Vapor Intrusion Coating System Installation: Surface Preparation, Sealing, and Application 18,000 square feet x \$20 per square foot = \$360,000.00 Contractual: \$219,100 Injection wells: 15 days of oversight (during well installation) x 12 hours per day x \$150.00 per hour = \$27,000 30 days of oversight (during injection) x 12 hours per day x \$150.00 per hour = \$54,000.00 Installation and Oversight of Injectible Permeable Reactive Barrier 15 days of oversight x 12 hours per day x \$150.00 per hour = \$27,000 Performance Monitoring and Reporting: 25 days of sampling x 10 hours per day x \$150.00 per hour = \$37,500 Ten groundwater sampling events (one year of quarterly sampling and three years of semi-annual sampling) of 10 sampling events x 10 monitoring wells, a duplicate, and a trip blank x \$80 per VOC analysis (EPA Method 8260) = \$9,600 160 hours of reporting x \$150.00 per hour = \$24,000 30 hours of QA/QC and review x \$200.00 per hour = \$6,000 Plugging and abandonment: Two days of oversight x 12 hours per day x \$150.00 per hour = \$3,600 Ten hours of reporting x \$150.00 per hour = \$1,500 One hour of review x \$200 per hour = \$200 Vapor Intrusion Coating System Installation: Installation Oversight 15 days x 10 hours per day x \$150 per hour = \$22,500 Confirmation Air Monitoring Event After Vapor Barrier Installation: Four Indoor Air Samples Analyzed for TO-15 at \$350/sample = \$1,400 12 hours of onsite sampling and travel time x \$150.00 per hour = \$1,800 16 hours of reporting x \$150.00 per hour = \$2,400 3 hours of QA/QC and review x \$200.00 per hour = \$600

d. Plan to Measure and Evaluate Environmental Progress and Results: Winston County will carefully track all outputs and outcomes (described in *Section 3.c.ii*) required in EPA Order 5700.A to ensure the grant funds are expended in a timely and efficient manner. These will be clearly identified in the project Work Plan and will be reported in the quarterly progress reports submitted to the EPA Project Officer via the EPA ACRES database. The mechanism for tracking progress will include preparation of a detailed schedule for submittal of draft and final compliance reports with assignments; submittal of project schedules by the EP for each task with each task proposal; weekly communications between project team members via email, phone, and review of technical data via online screen sharing applications to aid in the decision process. If progress is not meeting the new project schedule established for this cleanup grant, countermeasures (meetings with the EP, contractors, MDEQ, EPA to establish root cause and corrective actions) will be implemented to get the project back on track. Key tasks and outputs to ensure the desired environmental results are achieved within the four-year grant window are presented in the table in *Section 3.b* above.

Anticipated outcomes from the cleanup include liability protection via the MDEQ VCP and Brownfield Program; alignment of EPA funding objectives with redevelopment, economic expansion, removing health and safety concerns for workers, and addressing subsurface contamination; reduction or elimination of future contaminant exposure; and the return unused portions of the site to productive use that will support creating jobs for the local community and improving economic conditions. These outcomes align well with EPA strategic plan objectives.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure and ii. Description of Key Staff: **Luke Parkes**, Board President of the Winston County Board of Supervisors (BOS), will be Project Director for this grant and is the Chief Executive for Winston County. He has served on the Board for over 20+ years that includes providing leadership and vision for Winston County, setting county priorities and conducting the business of the county of over 17,000 residents. **Glen Haab** will act as Project Manager for this grant. Haab is an alumnus of the University of South Alabama, where he achieved a Bachelor of Science Degree in Marketing Management and Master of Business Administration (MBA). Prior to his arrival in Winston County, Haab served as the founding Executive Director of the Monroeville/Monroe County Economic Development Authority (MMCEDA) and the Monroeville/Monroe County Community Development Corporation (MCCDC), where he managed an EPA Brownfield Assessment Grant. **Kelli Rives** is the Comptroller for the Winston County Board of Supervisors. Rives is an experienced

financial practitioner with over ten years of service within the Winston County governmental structure. Rives possesses extensive knowledge in governmental budgeting, finance, and tax allocation and distribution as well as gainful experience in the workings of federal and state agencies and funding. Rives will act as Alternate Project Manager for this grant.

iii. Acquiring Additional Resources: The primary additional resource necessary to this project will be a qualified environmental professional (EP) (Consultant) who is experienced with the EPA Brownfields Cleanup Grant process and the MDEQ's Brownfield program and Voluntary Cleanup Program (VCP). The EP, procured by the County in accordance with state and federal guidelines, will be responsible for preparing the final ABCA/cleanup plans, QAPP, Brownfield/VCP application, bid specifications; overseeing site work; conducting soil sampling during excavation activities; executing waste manifests as an authorized agent of the County; ensuring all quality control objectives are met; and preparing all reports. The EP will also be responsible for preparing all programmatic reports and updating the ACRES database. The EP will coordinate contractors, Subtitle D landfills, hazardous waste transporters, and laboratories. The EP will be overseen and monitored by Winston County.

b. Past Performance and Accomplishments:

i. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments Glen Haab's (Project Manager for this grant) experience in grant management and administration began over 15 years ago with his participation in the United States Department of Labor WIRED Grant. Through this professional opportunity, Haab became familiar with the other federal, state, and private funding sources, which enhanced his skill set in writing, acquiring, and implementing grants. During his tenure at the MMCEDA, Haab secured and managed various United States Department of Agriculture (USDA) Rural Business Enterprise Grants (RBEG), USDA Economic Impact Initiative (EII) Grants, and Alabama Department of Transportation (ALDOT) funded projects. Haab was also instrumental in securing and managing a successful Environmental Protection Agency (EPA) Brownfield Grant for Monroe County before his departure to the Winston County. Since that time, Haab was instrumental in coordinating, managing, and implementing a successful \$400,000 EPA Brownfields Assessment Grant that was awarded to the Louisville Coalition in the Spring of 2017. This grant became a catalyst for development and recruitment, as several brownfield properties were redeveloped into tax generating businesses, which enhanced job creation and capital investment within Winston County. As a result, the Winston County and the City of Louisville pursued and secured another EPA Brownfields Assessment Grant for \$484,000 in the Spring of 2022. This grant is currently being implemented and is building off the success of the inaugural grant award.

(2) Compliance with Grant Requirements Winston County has successfully complied with all assurances, terms, and conditions of the grants/funds listed above, in addition to dozens of other state, federal and foundation projects. Through the outstanding effort of our team, no corrective measures have been taken on previous grant activities. WCEDDP and its leadership have a proven history of timely and acceptable reporting and compliance with all grant-related activities.

ⁱ US Department of Labor, [Bureau of Labor Statistics](#). 2019 - September

ⁱⁱ Data for Winston County.

ⁱⁱⁱ <http://www.dor.ms.gov/Statistics/Pages/Sales-Tax-Collections.aspx>

^{iv} Documentation to the NCES Common Core of Data Public Elementary/Secondary School Universe Survey (2013).

^v US Department of Health & Human Services, Health Resources and Services Administration, [Area Health Resource File](#). 2006-10.

^{vi} Centers for Disease Control and Prevention, Behavioral Risk Factor Surveillance System. Additional data analysis by CARES. 2011-12.

^{vii} CDC, National Vital Statistics System.

^{viii} www.americashealthrankings.org

^{ix} https://www.atsdr.cdc.gov/HAC/pha/AmericanCreosote/American_Creosote_Works_PHA_508.pdf

^x EJScreen - http://ejscreen.epa.gov/mapper/ejscreen_SOE.aspx, 2020.

^{xi} https://www.epaossc.org/site/sitreprofprofile.aspx?site_id=9889&counter=23226

^{xii} https://www.epaossc.org/site/sitreprofprofile.aspx?site_id=9889&counter=26750

THRESHOLD CRITERIA

**WINSTON COUNTY DEVELOPMENT BUILDING, LOUISVILLE, MS
THRESHOLD CRITERIA
FY24 EPA BROWNFIELDS CLEANUP GRANT**

1. Applicant Eligibility

The Winston County Board of Supervisors is eligible for an EPA Brownfields Cleanup Grant as a General Purpose Unit of Local Government.

2. Previously Awarded Cleanup Grants

The Winston County Development Building site in Louisville, MS, has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The Winston County Board of Supervisors does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Winston County Board of Supervisors is the sole deed owner of the target site, which is the subject of this EPA Brownfields Cleanup Grant application. The property was acquired through fee simple purchase by the Winston County Board of Supervisors on June 18, 1997 from Sutrap, Inc.

5. Basic Site Information

- a) The name of the site for the purposes of this grant is the Winston County Development Building Site.
- b) The site address is 923 South Church Avenue, Louisville, Mississippi 39339
- c) Winston County Board of Supervisors is the current owner of the site.

6. Status and History of Contamination at the Site

- a) The predominant contaminant at the site is hazardous substances.
- b) **Operational History:** Interviews and historical records indicate that the property was first developed in the early 1960s by the Spartus Clock Manufacturing Company, which operated at the property until 1996, when Spartus was acquired by General Time Corporation. The Spartus Company manufactured clocks at the facility, which included painting and plating operations. The property was acquired by Winston County in 1997 and leased to the Teters Floral company, which used the building as a distribution center where silk flowers were received from China and shipped to retail stores. The eastern portion of the building was destroyed by a tornado in 2014, and the Teters Floral company moved out of the property in January 2017.

Current Use: The site is primarily vacant, unused, and underutilized warehouse space. There are some limited areas of the building that are occupied by tenants. Taylor

**WINSTON COUNTY DEVELOPMENT BUILDING, LOUISVILLE, MS
THRESHOLD CRITERIA
FY24 EPA BROWNFIELDS CLEANUP GRANT**

Machine Works operates in the southern portion of the building, using a portion of the building for warehousing and distribution.

- c) Environmental concerns at the site include the following:
- Groundwater impacts - 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene, and perchloroethylene (PCE) and its degradation products, TCE, cis-1,2-dichloroethene, and vinyl chloride
 - Soil Vapor Impacts - chloroform and tetrachloroethene (TCE)
- d) How the site became contaminated. Nature and extent of contamination.

Elevated concentrations of PCE and its degradation products, TCE, cis-1,2-dichloroethene, and vinyl chloride, are present in the groundwater on the western portion of the site and downgradient on the eastern portion of the site. The source of PCE, TCE, and their degradation products are commonly related to the use of solvents and degreasers. Elevated concentrations of 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were also detected in the groundwater collected from temporary well TW-2 on the western portion of the site. The constituents are typically associated with degraded petroleum fuel and hydrocarbon solvents. These are products that would have likely been utilized at the site by the Spartus Company during their manufacturing operations, prior to Winston County Board of Supervisors' acquisition of the property. Degreasers and solvents would have been used to clean parts and heavy machinery.

7. Brownfields Site Definition

The Winston County Board of Supervisors affirms that the Winston County Development Building Site:

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

8. Environmental Assessment Required for Cleanup Grant Applications

Multiple environmental assessments have been conducted at the site to evaluate environmental conditions. These include the following:

- ASTM E1527-13 Phase I Environmental Site Assessment (ESA) prepared on July 6, 2018 (funded by City of Louisville's EPA Brownfield Assessment Grant).
- ASTM E1903-19-equivalent Phase II ESA prepared on November 16, 2018 (funded by City of Louisville's EPA Brownfield Assessment Grant).
- Phase III ESA prepared on May 15, 2020 (funded by City of Louisville's EPA Brownfield Assessment Grant).
- Sub-Slab Soil Gas and Indoor Air Sampling conducted on October 22, 2020
- Vapor Intrusion Mitigation and Indoor Air Sampling Event conducted in June 2022

**WINSTON COUNTY DEVELOPMENT BUILDING, LOUISVILLE, MS
THRESHOLD CRITERIA
FY24 EPA BROWNFIELDS CLEANUP GRANT**

- Indoor Air Sampling Even conducted on July 2, 2022.

9. Site Characterization

- a) Not Applicable
- b) The Winston County Development Building Site is eligible to be enrolled in Mississippi's voluntary response program. The MDEQ has also confirmed that there has been a sufficient level of site characterization of the Site from environmental site assessments performed to date for remediation work to begin. A letter from the MDEQ supporting this information is attached.
- c) Not Applicable

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The Site does not require a Property-Specific Determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites:

It has been determined that the predominant contaminant on the site is hazardous substances. Sections i. and iii. do not apply to this site.

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

Bona Fide Prospective Purchaser Liability Protection – Non-Publicly Owned Site Acquired Prior to January 11, 2002.

- (a) Winston County Board of Supervisors acquired sole ownership of the site from Sutrap, Inc. by fee simple purchase (see attached Quit Claim Deed).
- (b) The property was acquired on June 18, 1997.
- (c) Any disposal of hazardous substances at the site occurred during the former operations by the Spartus Company, prior to the Winston County Board of Supervisors acquiring the property.
- (d) The Winston County Board of Supervisors has not caused or contributed to any release of hazardous substances at the site. The companies who have utilized the property since Winston County Board of Supervisors acquired the property have not utilized products that contain the contaminants that have been found at the site.
- (e) The Winston County Board of Supervisors has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**WINSTON COUNTY DEVELOPMENT BUILDING, LOUISVILLE, MS
THRESHOLD CRITERIA
FY24 EPA BROWNFIELDS CLEANUP GRANT**

13. Cleanup Authority and Oversight Structure

a. The Winston County Board of Supervisors will advertise a Request for Qualifications (RFQ) in the local newspaper and other media as appropriate, in order to retain an Environmental Professional (EP) and Contractor(s) to assist with the Cooperative Agreement per the competitive requirements of 2 CFR Part 200 and 2 CFR Part 1500. The EP and Contractor(s) will assist in the project using employees experienced in the technical aspects of brownfield grant terms and conditions and in the cleanup. The procurements will follow a fair and open competitive process. Disadvantaged Business Enterprises will have a fair opportunity to compete for all contract work. The Winston County Board of Supervisors will assign a review team to use a ranking system of applicants in order to select an EP and Contractor(s), using evaluation criteria such as experience, ability, capacity, costs, and overall value. A responsive and responsible vendor(s) will then be selected. Any subawards will comply with EPA's Subaward Policy, though none are anticipated.

b. Access to adjacent or neighboring properties will not be required. An additional community meeting will be held prior to conducting cleanup activities to inform the community of the remediation process and to address any concerns that may be raised. A public meeting has already been held to announce the project.

14. Community Notification

The Winston County Board of Supervisors provided the community with notice of our intent to apply for an EPA Brownfields Cleanup Grant and allowed the community an opportunity to comment on the draft application and the Draft Analysis of Brownfield Cleanup Alternatives.

a. Draft Analysis of Brownfield Cleanup Alternatives

The Winston County Board of Supervisors allowed the community an opportunity to comment on the draft application, which included an attached ABCA. The ABCA was created as part of the City of Louisville's CWA grant. The ABCA that was made available to the community is attached.

b. Community Notification Ad

The Winston County Board of Supervisors provided public notification on October 27, 2023 advertising their intent to apply for this cleanup grant, and for the community meeting scheduled for November 6, 2023. The notification was also made in a local newspaper, the Winston County Journal. Proof of publication of the community

**WINSTON COUNTY DEVELOPMENT BUILDING, LOUISVILLE, MS
THRESHOLD CRITERIA
FY24 EPA BROWNFIELDS CLEANUP GRANT**

notification ad is attached.

c. Public Meeting

A public meeting was held on November 6, 2023 to discuss the draft application and consider public comments prior to submittal of this application. The meeting was held in person at an Americans with Disabilities Act (ADA)-compliant facility. No persons with limited English proficiency were in attendance but would have been accommodated as needed. A meeting notes summary and a sign-in sheet are provided as attachments.

d. Submission of Community Notification Documents

A copy of the ABCA, a copy of the equivalent newspaper ad that solicited application comment, a summary of comments received, applicant's responses to those public comments, meeting notes summary from the public meeting, and a meeting sign-in sheet are attached. Minutes were taken of the Community Meeting that include a summary of the public comments received; the response to those comments; and a summary of the public meeting. No additional public comments were received by the City.

15. Contractors and Named Subrecipients

• **Contractors**

Not applicable. The Winston County Board of Supervisors has not selected a contractor that will be compensated with EPA funds made available under the RFA.

• **Named Subrecipients**

Not applicable. The Winston County Board of Supervisors will not engage a subrecipient to conduct the work proposed in this application.

MDEQ SUPPORT LETTER



State of Mississippi

TATE REEVES
Governor

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

November 1, 2023

Mr. Luke Parkes, President
Winston County Board of Supervisors
P.O Box 69
136 South Court Street
Louisville, MS 39339
lparkes@winstoncounty.org

RE: FY24 EPA Brownfields Cleanup Grant Proposal Acknowledgement
Winston County Development Building (former Teter's Floral property – ACRES
#237224)
923 South Church Ave. Louisville, MS

Dear Mr. Parkes:

The Mississippi Department of Environmental Quality (MDEQ) hereby acknowledges the Winston County Board of Supervisors' plans to apply for federal funds through the United States Environmental Protection Agency's (EPA) Brownfields initiative for the cleanup of the referenced site. MDEQ hereby affirms that the site is eligible to be enrolled in the state voluntary response program, which is the Mississippi Brownfield Program. It is our understanding that the County intends to enroll the site in the Mississippi Brownfield Program; and MDEQ has determined that there is a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

Since many brownfields are abandoned, underutilized, and contaminated, MDEQ is expressly interested in seeing entities like the Winston County Board of Supervisors taking the initiative to assess, remediate, and return these sites to productive use. These efforts are consistent with our mission to safeguard the health, safety, and welfare of present and future generations of Mississippians. MDEQ looks forward to our continued role in the County's Brownfield initiative and are available to assist you at any time. Should you have any questions or comments concerning this matter, please contact me at (601) 961-5240 or TWallace@mdeq.ms.gov.

Sincerely,

A handwritten signature in blue ink that reads "Thomas L. Wallace".

Thomas L. Wallace, P.E.
Division Chief – GARD
Mississippi Brownfield Coordinator

OFFICE OF POLLUTION CONTROL

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